

BY EMAIL/DoT WEBSITE

Government of India
Ministry of Communications
Department of Telecommunications
Sanchar Bhawan, 20, Ashoka Road, New Delhi - 110 001
(Data Services Cell)

No. 813-07/LM-18/2022-DS-II

Dated:04-01-2023

To,
All Internet Service Licensees'

Subject: CS (Comm) No. 265 of 2022; Universal City Studios LLC & Ors. V/s Vegamovies.run & Ors Before Hon'ble Delhi High Court.

In continuation to Department of Telecommunications even no. letter dated 09.05.2022; kindly find the enclosed Hon'ble Delhi High Court orders dated 06th December 2022 & 27th April, 2022 along with an application for impleadment of defendant no. 25 to 77, as provided by the advocate for the plaintiff, in the subject matter court case C.S. (Comm) No. 265 of 2022 for compliance. DoT is defendant No. 22 in the case.

2. Hon'ble Court vide order dated 27th April, 2022 has, inter alia, directed that:

23. Defendants No. 13 to 21 shall ensure compliance of this order by blocking Defendants No. 1 to 12 websites, their URLs and the respective IP addresses.

24. Defendants No. 22 and 23 are further directed to take immediate steps and issue requisite Notifications, calling upon various internet and telecom service providers registered under them to block the aforementioned websites identified by the Plaintiffs.

3. Further, Hon'ble Court vide order dated 06th December, 2022 has, inter alia, state that:

I.A. No.20579/2022 filed on behalf of plaintiff under Order 1 Rule 10 CPC seeking impleadment of Additional Mirrors, Redirects or Alphanumeric Variations as defendants in the Memo of Parties as defendants No. 25 to 77 in the memo of parties

*The plaintiff has filed affidavit of investigator along with sufficient material to prove that proposed defendants/websites are mirror/redirect/alphanumeric websites of defendants which are also involved in violation of copyrights of plaintiff and have been permanently restrained to do so. In view of the submissions and judgment relied upon by learned counsel for applicant, the websites mentioned in the prayer clause of the application especially **Schedule-A are impleaded as defendants no. 25 to 77.***

Since the newly added defendants are also stated to be involved in violation of copyrights of plaintiff, accordingly ex-parte Permanent Injunction

*dated 27.04.2022 is also extended against newly added defendants no. 25 to 77. **The DoT, ISPs and MEITY are directed to do the needful in terms of the abovesaid Decree of Permanent Injunction dated 27.04.2022.***

4. Accordingly, in view of the above, all the Internet Service licensees are hereby notified to take immediate necessary blocking action for compliance of the court order dated 06th December 2022 read with order 27th April, 2022 for blocking of **53 websites** of defendant no. 25 to 77, as mentioned in **Column '2' of the Schedule-A** of the application (copy enclosed).

ADET (DS-II)
Tel: 011-2303 6860
Email: adetds2-dot@gov.in

Encl: A/A

Copy to:

- i. Sh. V.Chinnasamy, Scientist E (chinnasamy.v@meity.gov.in), Electronics Niketan, Ministry of Electronics and Information Technology (MeitY) New Delhi (Respondent no. 23) for kind information and necessary action.
- ii. Counsel for DoT & MEITY for kind information.
- iii. Lawyer/Advocate for the plaintiff for kind information.
- iv. DoT Website.

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*

IN THE HIGH COURT OF DELHI AT NEW DELHI

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CS(COMM) 265/2022

UNIVERSAL CITY STUDIOS LLC & ORS.

..... Plaintiff

Through: Ms. Suhasini Raina alongwith Anjali
Agarwal and Mr. Sanidhya Roa, Advs.

versus

VEGAMOVIES.RUN & ORS.

..... Defendant

Through: Ms. Shefali, Advocate for D-22&23 (VC)

CORAM:

**JOINT REGISTRAR (JUDICIAL) SH. PURSHOTAM PATHAK
(DHJS)**

ORDER

06.12.2022

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Regular steno is on leave today and no substitute steno has been provided.

**I.A. No.20579/2022 filed on behalf of plaintiff under Order 1 Rule 10
CPC seeking impleadment of Additional Mirrors, Redirects or
Alphanumeric Variations as defendants in the Memo of Parties as
defendants No. 25 to 77 in the memo of parties**

Arguments heard.

Vide this order, I shall dispose of the present application filed by plaintiff under Order 1 Rule 10 CPC for impleadment. The learned counsel for plaintiff has submitted that the Hon'ble Court was pleased to grant ex-parte permanent injunction in this suit against the defendants vide order dated 27.04.2022 for infringement of copyrights with further directions that as and when plaintiff files an application under Order 1 Rule 10 CPC for impleadment of such websites, plaintiff shall file an affidavit confirming that the newly impleaded websites are mirror/redirect/alphanumeric websites,

with sufficient supporting evidence and that the application shall be listed before Joint Registrar, who on being satisfied with the material placed on record, shall issue directions to the ISPs to disable access in India in such mirror/redirect/alphanumeric websites.

It is stated that after passing of the abovesaid judgment, other websites, as disclosed in application, have also started violation and these are mirrors, redirects or alphanumeric variations of the website blocked pursuant to the order dated 27.04.2022 and are also necessary party to this suit. It is further stated that details of proposed defendants have been disclosed in Schedule-A annexed with application and they are also liable to be impleaded as defendants no. 25 to 77. It is further argued that even ex-parte Permanent injunction dated 27.04.2022 is also liable to be extended against them and application may be allowed.

I have heard the arguments and perused the record. The law to deal with such applications and extension of *ex-parte ad-interim* injunction to newly added defendants has already been laid down in *UTV Software Communication Ltd. & Ors. vs. 1337X.TO & Ors.*, wherein it has been observed vide paragraph 107 to the effect:-

“107. Keeping in view the aforesaid findings, a decree of permanent injunction is passed restraining the defendant-websites (as mentioned in the chart in paragraph no. 4(i) of this judgment) their owners, partners, proprietors, officers, servants, employees, and all others in capacity of principal or agent acting for and on their behalf, or anyone claiming through, by or under it, from, in any manner hosting, streaming, reproducing, distributing, making available to the public and/or communicating to the public, or facilitating the same, on their websites, through the internet in any manner

whatsoever, any cinematograph work/content/ programme/show in relation to which plaintiffs have copyright. A decree is also passed directing the ISPs to block access to the said defendant-websites. DoT and MEITY are directed to issue a notification calling upon the various internet and telecom service providers registered under it to block access to the said defendant-websites. The plaintiffs are permitted to implead the mirror/redirect/alphanumeric websites under Order I Rule 10 CPC in the event they merely provide new means of accessing the same primary infringing websites that have been enjoined. The plaintiffs are also held entitled to actual costs of litigation. The costs shall amongst others include the lawyer's fees as well as the amount spent on Court-fees. The plaintiffs are given liberty to file on record the exact cost incurred by them in adjudication of the present suits. Registry is directed to prepare decree sheets accordingly.”

The plaintiff has filed affidavit of investigator along with sufficient material to prove that proposed defendants/websites are mirror/redirect/ alphanumeric websites of defendants which are also involved in violation of copyrights of plaintiff and have been permanently restrained to do so. In view of the submissions and judgment relied upon by learned counsel for applicant, the websites mentioned in the prayer clause of the application especially Schedule-A are impleaded as defendants no. 25 to 77.

Since the newly added defendants are also stated to be involved in violation of copyrights of plaintiff, accordingly *ex-parte* Permanent Injunction dated 27.04.2022 is also extended against newly added defendants no. 25 to 77. The DoT, ISPs and MEITY are directed to do the needful in terms of the abovesaid Decree of Permanent Injunction dated 27.04.2022.

Amended memo of parties is taken on record.

I.A. stands disposed of.

Registry is directed to do the needful.

Copy of order be given *dasti*.

CS(COMM) 265/2022

Written statement not filed by defendant no. 1 to 23.

Let written statement be filed as per rules with advance copy to opposite party.

Replication there to be filed thereafter.

Issue summons to newly impleaded defendants 25 to 77 on filing of PF, through all permissible modes

Put up for completion of service/pleadings on 23.01.2023.

DECEMBER 6, 2022

SH. PURSHOTAM PATHAK (DHJS), J

Click here to check corrigendum, if any

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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

+ CS(COMM) 265/2022

UNIVERSAL CITY STUDIOS LLC & ORS. Plaintiffs

Through: Mr. Saikrishna Rajagopal,
Mr. Sidharth Chopra, Ms. Suhasini Raina,
Ms. Disha Sharma, Ms. Surabhi Pande and
Mr. Sanidhya Rao, Advocates.

versus

VEGAMOVIES.RUN & ORS. Defendants

Through:

CORAM:

HON'BLE MS. JUSTICE JYOTI SINGH

ORDER

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27.04.2022

I.A. 6388/2022(exemption)

1. Allowed, subject to all just exceptions.
2. Application stands disposed of.

I.A. 6390/2022(exemption from pre-suit mediation)

3. For the reasons stated in the application, the requirement of pre-institution mediation is dispensed with.
4. Application is allowed and disposed of.

I.A. 6389/2022(exemption from serving advance notice)

5. Since there is an urgency in the matter and the matter is being heard today, Plaintiffs are exempted from serving advance notice on Defendant No.22/Department of Telecommunications (DoT) and Defendant No.23/Ministry of Electronics and Information Technology (MEITY).
6. For the reasons stated in the application, the same is allowed and disposed of.

CS(COMM) 265/2022

7. Let plaint be registered as a suit.
8. Upon filing of process fee, issue summons to the Defendants, through all permissible modes, returnable on 03.08.2022. Summons shall state that the written statement shall be filed by the Defendants within 30 days from the receipt of summons. Along with the written statement, Defendants shall also file an affidavit of admission/denial of the documents of the Plaintiffs.
9. Replication be filed by the Plaintiffs within 15 days of the receipt of the written statement. Along with the replication, an affidavit of admission/denial of documents filed by the Defendants, shall be filed by the Plaintiffs.
10. If any of the parties wish to seek inspection of any documents, the same shall be sought and given within the timelines.
11. List before the Joint Registrar on 03.08.2022.
12. List before the Court on 31.08.2022.

I.A. 6387/2022(under Order 39 Rules 1 and 2 CPC, by Plaintiffs)

13. Issue notice to the Defendants through all prescribed modes, returnable on 31.08.2022.
14. Present application has been preferred by the Plaintiffs under Order 39 Rules 1 and 2 read with Section 151 of the Code of Civil Procedure 1908 for grant of *ex-parte ad-interim* injunction.
15. It is averred that Plaintiffs No. 1 to 6 are amongst the leading global entertainment companies engaged in the business of creation, production and distribution of motion pictures/cinematograph films, having exclusive rights to communicate their content. Plaintiffs' films being works of visual recording, which include sound recordings accompanying such visual

recordings, qualify as a “cinematograph film” under Section 2(f) of The Copyright Act, 1957 (hereinafter referred to as ‘the Act’). Any hosting, streaming, reproducing, distributing, making available to the public, and/or communicating to the public of the Original Content, or facilitating the same, without authorisation of the Plaintiffs, by any means on any platform including internet and mobile and/or any other medium would be illegal and amount to violation of the Plaintiffs’ copyright, protected under the Act.

16. Defendants No. 1 to 12 include vegamovies.run, with the additional domains vegamovies.app, vegamovies.bar, vegamovies.cx, vegamovies.info, vegamovies.ink, vegamovies.nl and vegamovies.onl (Defendant No. 1); 0123movie.stream with the additional domains 0123movies.ltd, 123movie.lc, 123movies.college, 123movies.futbol, 123movies.click, 123movies.gl, 123-movies.win, 123-movies.sx, 123movies44.com, 123movies0.gr, 123moviesgo.io, 123moviesme.online, 123moviess.se and 123movies.net (Defendant No. 2); allmovieshub.de with the additional domains allmovieshub.pro, allmovieshub.mobi, allmovieshub.org.in and allmovieshub.pw (Defendant No. 3); hdhub4u.mom with the additional domains hdhub4u.top, hdhub4u.li, hdhub4u.mx, and hdhub4u.one (Defendant No. 4); mkvcinemas.bz with the additional domain mkvcinemas.nz (Defendant No. 5); movierulzhd.bar with the additional domains 7movierulz.do, moviesrulz.net, 4movierulz1.com, 7moviesrulz.com, movierulz2free.com, movierulz4k.com and 4movierulz.live (Defendant No. 6); moviesverse.club with the additional domains, moviesverse.biz, moviesverse.mobi, moviesverse.me, moviesverse.com and 9moviesverse.in (Defendant No. 7); putlocker99.me (Defendant No. 8); themoviesflix.com.mx with the additional domains

themoviesflix.us.com and themoviesflix.com.ph (Defendant No. 9); unblockit.day with the additional domains unblockit.cam and unblockit.how (Defendant No. 10); uwatchfree.so with the additional domains uwatchfree.fo, uwatchfree.do and uwatchfree.vg (Defendant No. 11); tamilblasters.buzz with additional domains tamilblasters.bid, tamilblasters.club, tamilblasters.com, tamilblasters.net, tamilblasters.re and tamilblasters.vin (Defendant No.12), hereinafter referred to as “Defendant Websites” collectively. It is contended that Defendant Websites are online locations which enable use of Defendant Websites’ services, without any authorisation or license from the Plaintiffs, to: (a) view (by a process known as streaming/ downloading) cinematograph films, motion pictures, television programs or other audio-visual content, on devices connected to the Internet; (b) cause copies of those cinematograph films to be downloaded onto the memory of their devices for watching later or enabling others to watch or further copy those cinematograph film, and/or (c) identify other online locations including (by a process known as "linking") which enable those users to engage in the activities set out in (a) or (b). An illustrative list of illegal content made available by Defendants No.1 to 12 has been provided in para 30 of the plaint.

17. Learned Counsel for the Plaintiffs contends that Defendant Websites provide illegal content for free and such availability of content is supported by the advertisements featuring on these websites. The primary purpose of the Defendant Websites is to commit or facilitate copyright infringement. Thus, Defendants No. 1 to 12 are liable for infringement under Section 51(a)(ii), Section 51(b) and Section 51(a)(i) of the Act, for making a copy of the original content, including storing of it in any medium by electronic or

other means and communicating the original content to the public. Further, the hosting, streaming reproducing, distributing, making available to the public, and/or communicating to the public of the original content, or facilitating the same, without authorization of the Plaintiffs, amounts to violation of the Plaintiffs' copyright work, protected under the Act. In support of the contention, reliance is placed on the decision of this court in CS(COMM) 724 of 2017 dated 10.04.2019, *UTV Software Communication Ltd. & Anr. v. 1337x.to and Ors.*

18. Learned Counsel further submits that several of the domains/websites sought to be blocked by the present proceedings are really new iterations of domains/websites that were earlier blocked. Evidence collected by the investigator shows that the operators of the Defendant Websites are using known "pirate branding" to signal to users that the Defendant Websites are merely new iterations of sites that have been blocked earlier. Learned Counsel further submits that the Defendant Websites are in the form of new iterations and that the new iterations almost invariably have the same functionality and purpose as the earlier blocked sites and thus directions be issued to block the new iterations of the Defendant Websites as directed by the Court in *UTV Software Communication Ltd. (supra)*.

19. It is submitted that despite the legal notice calling upon the concerned Defendants to cease from engaging in their infringing activities, they continue to infringe the rights in Plaintiffs' original content. Defendant No.2, despite replying to the legal notice, stating that their websites do not contain Plaintiffs' content, continues to host the same. Defendant No.7, in response to the legal notice, removed access to Plaintiffs' content on their website <https://4moviesverse.cc>. After investigating the accessibility of the said

website, Plaintiffs removed the same from the array of parties. However, should the same be made accessible again and continue its infringing activities by making available the Plaintiffs' copyrighted content, Plaintiffs seek liberty to implead Website <https://4moviesverse.cc>. Other than these two instances, it is contended that the Defendant Websites are wilfully infringing Copyright material and ignoring or failing to respond to notice to cease all infringement. Access to many of Defendant Websites has been previously disabled in other jurisdictions, as elaborated in para 37 of the Plaintiff.

20. Having heard learned counsel for the Plaintiffs, this Court is of the view that Plaintiffs have made out a *prima facie* case for grant of *ex parte ad-interim* injunction. Balance of convenience lies in favour of the Plaintiffs and they are likely to suffer irreparable harm in case the injunction, as prayed for, is not granted.

21. Accordingly, Defendants No. 1 to 12 (and any such other mirror/redirect/alphanumeric website which appears to be associated with any of the Defendant Websites based on its name, branding or the identity of its operator, or discovered to provide additional means of accessing, the Defendant Websites, and other domains/domain along with their subdomains and subdirectories, owners/website operators/entities which are discovered to have been engaging in infringing the Plaintiffs' exclusive rights), their owners, partners, proprietors, officers, servants, employees, and all others in capacity of principals or agents, acting for and on their behalf, or anyone claiming through, by or under them are hereby restrained, from, in any manner hosting, streaming, reproducing, distributing, making available to the public and/or communicating to the public, or facilitating the same, on

their websites, through the internet in any manner whatsoever, any cinematograph work/content/programme/show in relation to which Plaintiffs have a Copyright.

22. Further, as held by this Court in *UTV Software Communication Ltd. (supra)*, in order for this Court to be freed from constant monitoring and adjudicating the issues of mirror/redirect/alphanumeric websites, it is directed that as and when the Plaintiffs file an application under Order 1 Rule 10 CPC for impleadment of such websites, Plaintiffs shall file an affidavit confirming that the newly impleaded website is a mirror/redirect/alphanumeric website which appears to be associated with any of the Defendant Websites based on its name, branding or the identity of its operator, or has been discovered to provide additional means of accessing the Defendant Websites and other domains/domain along with their subdomains and subdirectories, owners/website operators/entities which are discovered to have been engaging in infringing the Plaintiffs' exclusive rights, with sufficient supporting evidence. Such application shall be listed before the Joint Registrar, who on being satisfied with the material placed on record, shall issue appropriate directions to the ISPs.

23. Defendants No. 13 to 21 shall ensure compliance of this order by blocking Defendants No. 1 to 12 websites, their URLs and the respective IP addresses.

24. Defendants No. 22 and 23 are further directed to take immediate steps and issue requisite Notifications, calling upon various internet and telecom service providers registered under them to block the aforementioned websites identified by the Plaintiffs.

25. Plaintiffs shall comply with the provisions of Order 39 Rule 3 CPC within 10 days from today.

JYOTI SINGH, J

APRIL 27, 2022/st

IN THE HIGH COURT OF DELHI AT NEW DELHI
(ORDINARY ORIGINAL COMMERCIAL JURISDICTION)

I.A. NO. _____ OF 2022

IN

CS(COMM) NO. 265 OF 2022

IN THE MATTER OF

Universal City Studios LLC and Ors. ...Plaintiffs

Versus

Vegamovies.run & Ors. ...Defendants

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Place: New Delhi

Date: 30 November 2022



Anjali Agrawal | Sanidhya Rao
(D/2045/2020) | (D/8146/2021)

Saikrishna & Associates
Advocates for the Plaintiffs

57, Jor Bagh,

Delhi – 110003

+91 8871414503

sanidhya@saikrishnaassociates.com

NOTE: The present application is being filed in a Website blocking suit. The Email ID of newly impleaded websites, i.e., Defendant No.25-77, are the only publicly available contact details and have been served with a copy of the present application on the said Email IDs. All defendants have been served a copy of the present application on their publicly available contact details, i.e. Email IDs, in advance and proof of service along with supporting affidavit of Plaintiff's counsel is filed herewith. Application under Section 151, CPC seeking exemption from filing documents with proper margins, translated, original, certified copies etc. has been filed herewith for consideration by the Hon'ble Court.

IN THE HIGH COURT OF DELHI AT NEW DELHI
(ORDINARY ORIGINAL COMMERCIAL JURISDICTION)

I.A. NO. _____ OF 2022

IN

CS(COMM) NO. 265 OF 2022

IN THE MATTER OF

Universal City Studios LLC and Ors. ...Plaintiffs

Versus

Vegamovies.run & Ors. ...Defendants

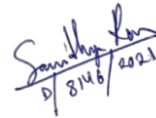
NOTICE OF MOTION

Sir,

The enclosed Application in the aforesaid matter is being filed on behalf of the Plaintiff and is likely to be listed on 05 December 2022 or any date thereafter. Please take note accordingly.

Place: New Delhi

Date: 30 November 2022



Anjali Agrawal | Sanidhya Rao
(D/2045/2020) | (D/8146/2021)

Saikrishna & Associates
Advocates for the Plaintiffs

57, Jor Bagh,

Delhi – 110003

+91 8871414503

sanidhya@saikrishnaassociates.com

IN THE HIGH COURT OF DELHI AT NEW DELHI

To,
The Deputy Registrar,
High Court of Delhi,
New Delhi

I.A. NO. _____ OF 2022

IN

CS(COMM) NO 265 OF 2022

IN THE MATTER OF:

Universal City Studios LLC and Ors. ...Plaintiffs

Versus

Vegamovies.run & Ors. ...Defendants

Sir,

Will you kindly treat the accompanying application as an urgent one in accordance with the High Court Rules and Orders and list the present application before the Ld. Joint Registrar as per judgement dated 10.04.2019 passed by this Hon'ble Court in CS(COMM) 724/ 2017, *UTV Software Communications Ltd. & Ors. v. 1337x.to & Ors.* The relevant portion of the said judgement has been extracted herein below:

“101. Consequently, along with the Order I Rule 10 application for impleadment, the plaintiffs shall file an affidavit confirming that the newly impleaded website is a mirror/redirect/alphanumeric website with sufficient supporting evidence. On being satisfied that the impugned website is indeed a

mirror/redirect/alphanumeric website of injuncted Rogue Website(s) and merely provides new means of accessing the same primary infringing website, the Joint Registrar shall issue directions to ISPs to disable access in India to such mirror/redirect/alphanumeric websites in terms of the orders passed.”.

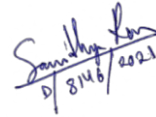
The grounds of urgency:

As prayed.

Yours faithfully,

Place: New Delhi

Date: 30 November 2022



Anjali Agrawal | Sanidhya Rao
(D/2045/2020) | (D/8146/2021)

Saikrishna & Associates
Advocates for the Plaintiffs

57, Jor Bagh,

Delhi – 110003

+91 8871414503

sanidhya@saikrishnaassociates.com

IN THE HIGH COURT OF DELHI AT NEW DELHI
(ORDINARY ORIGINAL COMMERCIAL JURISDICTION)

I.A. NO. _____ OF 2022

IN

CS(COMM) NO 265 OF 2022

IN THE MATTER OF:

Universal City Studios LLC and Ors. ...Plaintiffs

Versus

Vegamovies.run & Ors. ...Defendants

APPLICATION ON BEHALF OF THE PLAINTIFFS UNDER
ORDER I RULE 10 OF THE CODE OF CIVIL PROCEDURE,
1908 SEEKING IMPLEADMENT OF ADDITIONAL
MIRRORS, REDIRECTS, OR ALPHANUMERIC
VARIATIONS AS DEFENDANTS IN THE MEMO OF
PARTIES

MOST RESPECTFULLY SHEWETH:

1. Plaintiffs had filed the instant suit seeking permanent injunction against infringement of its copyright in its films being works of visual recording and which include sound recordings accompanying such visual recordings, unfair competition and commercial misappropriation of its exclusive rights enumerated under Section 14(d) of the Copyright Act, 1957. The Plaintiffs crave leave to refer to and rely upon the plaint which may be read as a part and parcel of this application, the contents of which are not being repeated for the sake of brevity.

2. The present application has been filed seeking impleadment of additional mirror/redirect/alphanumeric variations under Order I Rule 10 CPC as these variations merely provide access to the same websites which are the subject of the main injunction, namely, the following domains, which are also listed in Schedule A with their URLs and IP addresses:

- 25) Vegamovies.de
- 26) Vegamovies.buzz
- 27) 0123movie.onl
- 28) 123movies.ba
- 29) 123moviesfree.net
- 30) 123movies-official.net
- 31) Allmovieshub.one
- 32) Allmovieshub.website
- 33) Allmovieshub.info
- 34) hdhub4u.boats
- 35) hdhub4u.run
- 36) hdhub4u.app
- 37) hdhub4u.onl
- 38) hdhub4u.la
- 39) hdhub4u.im
- 40) hdhub4you.art
- 41) hdhub4u.skin
- 42) hdhub4u.vip
- 43) 5movierulz.am
- 44) 5movierulz.im
- 45) 5movierulz.tc
- 46) 5movierulz.com
- 47) moviesrulz.live
- 48) movierulzhd.guru

- 49) movierulzhd.ink
- 50) movierulzhd.vin
- 51) moviesrulz.me
- 52) 7movierulz.rip
- 53) moviesmod.com
- 54) moviezverse.net
- 55) moviezverse.in
- 56) moviesverse.asia
- 57) moviesversee.co
- 58) themoviesverse.net
- 59) themoviesverse.co
- 60) themoviezflix.co.in
- 61) themoviezflix.io
- 62) themoviezflix.net
- 63) themoviezflix.org
- 64) themoviezflix.art
- 65) themoviesflix.life
- 66) unblockit.page
- 67) unblockit.nz
- 68) unblockit.bet
- 69) unblockit.blue
- 70) uwatchfree.stream
- 71) uwatchfree.ca
- 72) uwatchfree.click
- 73) tamilblasters.autos
- 74) tamilblasters.hair
- 75) tamilblasters.wiki
- 76) tamilblasters.casa
- 77) tamilblasters.icu

(hereinafter referred to as ‘Proposed Defendant Websites’) as Defendants No. 25 – 77. The additional mirrors/redirects/alphanumeric variation, who the Plaintiffs are proposing to implead in the present suit is engaged in the business of hosting, streaming, retransmitting, making available for viewing and download, providing access to, and communicating to the public, third party content and information through the medium of internet and mobile transmission, the Plaintiffs’ films without authorization leading to a direction/redirection of viewers from the Plaintiffs’ legal/subscription based channels to internet based viewing through such illegal means.

3. It is submitted that “Ashok Kumar” (Defendant No. 24) or “John Doe” was also impleaded as party to the suit and leave of this Hon’ble Court was duly sought by the Plaintiffs to amend the memo of parties and substitute all such Ashok Kumar with specific websites which were found violating the Plaintiffs’ exclusive rights. In this regard, reliance is placed upon paragraph 60 of the Plaint.
4. It is submitted that *vide* Order dated 27.04.2022, this Hon’ble Court was pleased to pass an *ex-parte* ad interim Order against the said Defendant Websites and directed the ISPs to block access to the Defendant Websites. For the sake of convenience, the relevant portion of the Order is extracted herein below:

21. Accordingly, Defendants No. 1 to 12 (and any such other mirror/redirect/alphanumeric website which appears to be associated with any of the Defendant Websites based on its name, branding or the identity of its operator, or discovered to provide additional means of accessing, the Defendant Websites, and other domains/domain along with their

subdomains and subdirectories, owners/website operators/entities which are discovered to have been engaging in infringing the Plaintiffs' exclusive rights), their owners, partners, proprietors, officers, servants, employees, and all others in capacity of principals or agents, acting for and on their behalf, or anyone claiming through, by or under them are hereby restrained, from, in any manner hosting, streaming, reproducing, distributing, making available to the public and/or communicating to the public, or facilitating the same, on their websites, through the internet in any manner whatsoever, any cinematograph work/content/programme/show in relation to which Plaintiffs have a Copyright.

xxx xxx xxx

23. Defendants No. 13 to 21 shall ensure compliance of this order by blocking Defendants No. 1 to 12 websites, their URLs and the respective IP addresses.

24. Defendants No. 22 and 23 are further directed to take immediate steps and issue requisite Notifications, calling upon various internet and telecom service providers registered under them to block the aforementioned websites identified by the Plaintiffs.

Copy of the Order dated 27.04.2022 is attached herewith.

5. Plaintiffs had instituted 8 suits for Copyright Infringement against 30 infringing domains that were communicating to the public, Plaintiffs' copyright works without their authorization. The said suits were filed before the Hon'ble High Court of Delhi, being CS(COMM) 724 of 2017 *UTV Software Communication Ltd. & Anr. v. 1337x.to and Ors.*, etc. Plaintiffs obtained a permanent injunction against the Defendant Websites therein, vide Judgement dated 10.04.2019. It is submitted that, this Hon'ble Court was pleased to record that the Defendant Websites are Hydra Headed Rogue websites who on being blocked, actually multiply and resurface as redirect or mirror or alphanumeric websites. Further, this Hon'ble Court held that such hydra-headed websites can be blocked by filing an impleadment

application under Order I Rule 10 along with the evidence against them. The relevant portion of the Judgement is reiterated herein below:

94. *Now, the question that arises for consideration is how should courts deal with 'hydra headed' websites who on being blocked, actually multiply and resurface as alphanumeric or mirror websites. In the present batch of matters though this Court had injuncted the main website by way of the initial injunction order, yet the mirror/alphanumeric/redirect websites had been created subsequently to circumvent the injunction orders.*
95. *It is pertinent to mention that in Greek mythology the Hydra also called Lernaean Hydra is a serpent-like monster. The Hydra is a nine-headed serpent like snake. It was said that if you cut off one hydra head, two more would grow back.*
96. *Critics claim that website blocking is an exercise in futility as website operators shift sites—the so-called "whack-a-mole" effect.*
97. *Internationally, there has been some recent development to deal with the aforesaid menace in the form of a "Dynamic Injunction" though limited to mirror websites.*
98. *The High Court of Singapore in the case of Disney Enterprise v. M1 Ltd., (2018) SGHC 206 has after discussing the cases of 20th Century Fox v. British Telecommunications PLC, (2012) 1 All ER 869 and Cartier International AG v. British Sky Broadcasting (supra), held that the applicant was not obligated to return to court for an order with respect to every single IP address of the infringing URLs already determined by the Court. The Court held as under:-*
- "38 I found that the court has the jurisdiction to issue a dynamic injunction given that such an injunction constitutes "reasonable steps to disable access to the flagrantly infringing online location". This is because the dynamic injunction does not require the defendants to block additional FIOs which have not been included in the main injunction. It only requires the defendants to block additional domain names, URLs and/or IP addresses that provide access to the same websites which are the subject of the main injunction and which I have found constitute FIOs (see [19] - [29] above). Therefore, the dynamic*

injunction merely blocks new means of accessing the same infringing websites, rather than blocking new infringing websites that have not been included in the main injunction.

39. In fact, under the dynamic injunction applied for in the present case, the plaintiffs would be required to show in its affidavit that the new FQDNs provide access to the same FIOs which are the subject of the main injunction before the defendants would be required to block the new FQDNs (see [6] above) ...

xxx xxx xxx

42. In relation to S 193DB(3)(d) of the Copyright Act, i.e, the effectiveness of the proposed order, the dynamic injunction was necessary to ensure that the main injunction operated effectively to reduce further harm to the plaintiffs. This is due to the ease and speed at which circumventive measures may be taken by owners and operators of FIOs to evade the main injunction, through for instance changing the primary domain name of the FIO. Without a continuing obligation to block additional domain names, URLs and/or IP addresses upon being informed of such sites, it is unlikely that there would be effective disabling of access to the 53 FIOs."

(emphasis supplied)

- 99. Though the dynamic injunction was issued by the Singapore High Court under the provisions of Section 193 DDA of the Singapore Copyright Act, and no similar procedure exists in India, yet in order to meet the ends of justice and to address the menace of piracy, this Court in exercise of its inherent power under Section 151 CPC permits the plaintiffs to implead the mirror/redirect/alphanumeric websites under Order I Rule 10 CPC as these websites merely provide access to the same websites which are the subject of the main injunction.*
- 100. It is desirable that the Court is freed from constantly monitoring and adjudicating the issue of mirror/redirect/alphanumeric websites and also that the plaintiffs are not burdened with filing fresh suits. However, it is not disputed that given the wide ramifications of site-wide blocking orders, there has to be judicial scrutiny of such directions and that*

ISPs ought not to be tasked with the role of arbiters, contrary to their strictly passive and neutral role as intermediaries.

101. *Consequently, along with the Order I Rule 10 application for impleadment, the plaintiffs shall file an affidavit confirming that the newly impleaded website is a mirror/redirect/alphanumeric website with sufficient supporting evidence. On being satisfied that the impugned website is indeed a mirror/redirect/alphanumeric website of injuncted Rogue Website(s) and merely provides new means of accessing the same primary infringing website, the Joint Registrar shall issue directions to ISPs to disable access in India to such mirror/redirect/alphanumeric websites in terms of the orders passed.*

Copy of the judgement dated 10.04.2019 is attached herewith.

6. It is submitted that the Proposed Defendant Websites are hydra headed/pirate brand websites and are making available and communicating Plaintiffs' Copyrighted material in which Plaintiffs have an exclusive right without permission and authorization. It is submitted that since these websites are showing Plaintiffs' content without authorization, this Proposed Defendant Websites fall squarely within the scope of the Judgement dated 10.04.2019 passed and the Plaintiffs is entitled to seek their impleadment and extension of the injunction Order.
7. In the light of the above, it is imperative to implead the Proposed Defendant Websites. This Hon'ble Court ought to extend the *ex-parte ad-interim* injunction against the Proposed Defendant Websites. Further, the evidence produced by the Plaintiffs establishes that the Proposed Defendant Websites are merely providing a new means of

accessing the same primary infringing websites that have been enjoined. Therefore, the Proposed Defendant Websites ought to be blocked, and that this Hon'ble Court ought to issue directions to the ISPs to disable access to the Proposed Defendant Websites. Further, this Hon'ble Court in its Judgment dated 09.08.2019 has settled the law on impleadment of such mirror/redirect/alphanumeric websites. The relevant portions of the judgement are extracted hereinbelow:

107. Keeping in view the aforesaid finding ... the plaintiffs are permitted to implead the mirror/redirect/alphanumeric websites under Order I Rule 10 CPC in the event they merely provide new means of accessing the same primary infringing websites that have been enjoined...

8. It is submitted that the Plaintiffs have, through its counsels, served Legal Notice to the Proposed Defendant Websites, calling upon them to cease and desist from indulging in such infringing activities. However, till date, the Websites have failed to stop their infringing activities.
9. Thus, in light of the above, it is imperative that the Proposed Defendant Websites are impleaded in the instant suit as Defendants to safeguard the interest of the Plaintiffs.

PRAYER:


10. In view of the above, Plaintiffs humbly pray that this Hon'ble Court may be pleased to:
 - a. Implead the Proposed Defendant Websites whose domains, subdomains and subdirectories are listed above and whose domains, URLs and IP addresses

are listed in the attached Schedule A, as *Defendants No.25 – 77*, to the instant suit and extend the *ex-parte ad-interim* injunction dated 27.04.2022;

- b. Pass an order directing the Defendants No. 13 to 21, their directors, partners, proprietors, officers, affiliates, servants, employees, and all others in capacity of principal or agent acting for and, on their behalf, or anyone claiming through, by or under it, to block access to the Proposed Defendant Websites listed in Schedule A;
- c. Pass an Order directing the Defendants No. 22 and 23, to issue a notification calling upon the various internet and telecom service providers registered under it to block access to the Proposed Defendant Websites listed in Schedule A;
- d. Take the amended Memo of Parties on record; and
- e. Pass any further orders as this Hon'ble Court may deem fit and proper in the facts and circumstances of the present case be passed.

Place: New Delhi

Date: 30 November 2022



Anjali Agrawal | Sanidhya Rao
(D/2045/2020) | (D/8146/2021)

Saikrishna & Associates

Advocates for the Plaintiffs

57, Jor Bagh, Delhi – 110003

+91 8871414503

sanidhya@saikrishnaassociates.com

SCHEDULE A

Injuncted Website Location (at the time of suit as well as additionally impleaded websites)	URL of New Mirror/Redirect/Alphanumeric Variation of Injuncted Website	Domain Name of Mirror/Redirect/Alphanumeric Variation of Injuncted Website	IP Addresses of New Mirror/Redirect/Alphanumeric Variation of Injuncted Website
vegamovies.run vegamovies.app vegamovies.bar	https://vegamovies.de	vegamovies.de	172.67.149.73 104.21.79.226
vegamovies.cx vegamovies.info	http://vegamovies.buzz	vegamovies.buzz	172.67.150.13 104.21.63.201
vegamovies.ink vegamovies.nl	https://0123movie.onl	0123movie.onl	172.67.138.57 104.21.46.109
vegamovies.onl 0123movie.stream	https://123movies.ba	123movies.ba	172.67.198.70 104.21.21.108
am 0123movies.icu 0123movies.ltd	https://ww1.123moviesfree.net	123moviesfree.net	104.31.16.11 104.31.16.118
123movie.lc 123movie.ms 123moviefree.s	https://ww4.123movies-official.net	123movies-official.net	172.67.176.67 104.21.96.89
c	https://allmovieshub.one	allmovieshub.one	198.54.117.21 0

123movies.college	https://allmovieshub.website	allmovieshub.website	172.67.160.209
123movies.futbol	https://allmovieshub.info	allmovieshub.info	104.21.14.247
123movies.click	http://allmovieshub.info	allmovieshub.info	104.21.47.85
123movies.globe	https://hdhub4u.boats	hdhub4u.boats	172.67.145.250
123-movies.net	https://hdhub4u.boats	hdhub4u.boats	104.21.58.39
123-movies.win	https://hdhub4u.boats	hdhub4u.boats	172.67.155.246
123-movies.sx	https://hdhub4u.run	hdhub4u.run	172.67.169.6
123movies44.com	https://hdhub4u.run	hdhub4u.run	104.21.27.59
123movies0.gr	https://hdhub4u.app	hdhub4u.app	172.67.144.80
123moviesfree.so	https://hdhub4u.app	hdhub4u.app	104.21.87.157
123moviesgo.io	http://hdhub4u.onl	hdhub4u.onl	172.67.192.224
123moviesgotocom	http://hdhub4u.onl	hdhub4u.onl	104.21.11.229
123moviesmeonline	https://www.hdhub4u.la	hdhub4u.la	104.21.48.67
123moviess.se	https://hdhub4u.im	hdhub4u.im	104.21.89.204
123movies.net	https://hdhub4u.im	hdhub4u.im	172.67.164.225
allmovieshub.de	https://hdhub4u.you.art	hdhub4u.you.art	104.21.29.84
allmovieshub.pro	https://hdhub4u.you.art	hdhub4u.you.art	172.67.148.162
allmovieshub.mobi	https://hdhub4u.skin	hdhub4u.skin	104.21.50.66
	https://hdhub4u.skin	hdhub4u.skin	172.67.202.86
	http://hdhub4u.vip	hdhub4u.vip	172.67.197.108
	http://hdhub4u.vip	hdhub4u.vip	104.21.92.199

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ulz.tc">http://5movier ulz.tc	5movierulz.tc	172.67.188.20 6
hdhub4u.top			104.21.8.230
hdhub4u.li			
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hdhub4u.one	<a href="http://5movier
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mkvcinemas.bz	<a href="https://ww8.m
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bi		et	104.21.16.224
moviesverse.me	http://moviezverse.in	moviezverse.in	104.21.36.43
moviesverse.co		n	172.67.185.48
m	http://moviesverse.asia	moviesverse.asia	104.21.37.23
4moviesverse.c		sia	172.67.203.71
c	https://moviesverse.co	moviesversee.co	104.21.24.68
moviesverse.sh		co	172.67.217.89
op	https://themoviesverse.net	themoviesverse.net	
9moviesverse.in		e.net	
putlocker99.me	https://themoviesverse.co	themoviesverse.co	172.67.215.13
themoviesflix.c		e.co	7
om.mx			104.21.16.185
themoviesflix.u	https://themoviezflix.co.in	themoviezflix.co.in	104.21.71.197
s.com		co.in	172.67.148.44
themoviesflix.c	https://themoviezflix.io	themoviezflix.io	172.67.164.14
om.ph		io	6
unblockit.day			104.21.89.197
unblockit.cam	https://themoviezflix.net	themoviezflix.net	104.21.44.79
unblockit.how		net	172.67.197.14
uwatchfree.so			7
uwatchfree.fo	http://themoviezflix.org	themoviezflix.org	172.67.131.92
uwatchfree.do		org	104.21.3.243
uwatchfree.vg	https://themoviezflix.art	themoviezflix.art	104.21.56.136
tamilblasters.bu		art	
zz	https://themoviesflix.life	themoviesflix.life	172.67.164.10
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d			104.21.49.149

tamilblasters.cl ub	https://unblockit.page	unblockit.page	104.26.12.134
tamilblasters.com	https://unblockit.nz	unblockit.nz	104.26.4.131 104.26.5.131
tamilblasters.net			172.67.72.232
tamilblasters.re	https://unblockit.bet	unblockit.bet	172.67.198.40 104.21.68.198
tamilblasters.vi n	https://unblockit.blue	unblockit.blue	172.67.151.10 1 104.21.72.150
	https://www.uwatchfree.stream	uwatchfree.stream	104.21.74.154 172.67.159.21 5
	https://www.uwatchfree.ca	uwatchfree.ca	104.21.67.39 172.67.211.24 6
	https://www.uwatchfree.click	uwatchfree.click	172.67.188.15 5 104.21.19.201
	https://tamilblasters.autos	tamilblasters.autos	104.21.39.23 172.67.142.57
	https://tamilblasters.hair	tamilblasters.hair	172.67.134.11 5 104.21.25.181
	http://tamilblasters.wiki	tamilblasters.wiki	104.21.69.86 172.67.206.13 6
	http://tamilblasters.casa	tamilblasters.casa	172.67.215.73 104.21.16.183

	http://tamilblasters.icu	tamilblasters.icu	172.67.212.14 0 104.21.85.243
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IN THE HIGH COURT OF DELHI AT NEW DELHI
(ORDINARY ORIGINAL COMMERCIAL JURISDICTION)

I.A. NO. _____ OF 2022

IN

CS(COMM) NO. 265 OF 2022

IN THE MATTER OF

Universal City Studios LLC and Ors. ...Plaintiffs

Versus

Vegamovies.run & Ors. ...Defendants

AFFIDAVIT OF MR. VISHAL AHUJA, AUTHORISED SIGNATORY OF PLAINTIFFS, SON OF HARISH AHUJA, AGED AROUND 39 YEARS, HAVING OFFICE AT 57, JOR BAGH, NEW DELHI 110003, INDIA.

I, the abovenamed deponent, do hereby solemnly affirm and declare as under:



1. That I am the authorized signatory of the Plaintiffs and am duly authorized and competent to swear the present Affidavit.

2. That I have read the contents of the Application and the contents of the same, as well as the documents filed may be read as the part and parcel of the present affidavit, the same are not being reproduced herein for the sake of brevity.

Arjita Singh
I identified the deponent who has signed in my presence.

[Signature]
DEPONENT

30 NOV 2022

VERIFICATION
CERTIFIED THAT
Shri/Smt./Km...
S/o, W/o, P/o...
Identified by...
Has...
Delhi on...
That the contents of the affidavit which have been read & explained to him/her are true & correct to his/her knowledge

Verified at New Delhi on this 30 November 2022 that the contents of the above Affidavit are true to the best of my knowledge, information and belief and nothing material has been concealed therefrom.

30 NOV 2022

[Signature]
DEPONENT

[Signature]
NOTARY