

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-32/2019-DS-II

Dated:06-01-2023

To,

All Internet Service Licensee's

Subject: C.S.(COMM) No. 418 of 2019; Warner Bros. Entertainment Inc. vs. <https://yo-movies.com> & Ors., before Hon'ble Delhi High Court.

In continuation to Department of Telecommunications (DoT) even no. letters dated 23.08.2019, 15.01.2020, 22.10.2020 & 09.11.2021, kindly find the enclosed Hon'ble Delhi High court orders dated 15.12.2022 & 08.09.2022 in the subject matter case C.S.(Comm) No. 418 of 2019 for compliance in respect of websites of defendant no. 25 to 28.

2. Hon'ble Court vide order dated 08th September, 2022 has, inter alia, directed that:

1. The Plaintiff has filed the present suit inter-alia praying for the following reliefs:

"51. In light of the foregoing, it is most respectfully prayed that this Hon'ble Court may be pleased to

iii. Issue an order directing the Defendant Nos. 11 and 12, to issue a notification calling upon the various internet and telecom service providers registered under it to block access to the Defendant No. 1 websites identified by the Plaintiff in the instant suit (and such other mirror/redirect/alphanumeric websites discovered to provide additional means of accessing the Defendant Website, and other domains/domain owners/website operators/entities which are discovered to have been engaging in infringing the Plaintiff's exclusive rights);

26. The suit is, therefore, decreed in terms of prayers (i), (ii) and (iii) of the Plaint. The Plaintiff is also permitted to implead any mirror/redirect/alphanumeric websites which provide access to the Defendants Nos. 1, 14 to 24 websites by filing an appropriate application under Order I Rule 10 of the CPC, supported by affidavits and evidence as directed in UTV Software (supra). Any website impleaded as a result of such application will be subject to the same decree.

3. Further, Hon'ble Court vide order dated 15th December, 2022 has, inter alia, directed that:

I.A. 21402/2022 filed by plaintiff Under Order 1 Rule 10 CPC seeking impleadment of additional mirrors, redirects or alpha numeric variations as defendants 25-28 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 of Ld. Counsel for the applicant and the directions passed in para no. 26 of the said judgment, the websites mentioned in the prayer clause of the application especially **Schedule-A** are impleaded as defendant no. 25-28.*

*Since the newly added defendants are also stated to be involved in violation of copyrights of plaintiff, accordingly the decree of permanent injunction dated 08.09.2022 is also extended against newly added defendant no. 25-28. **The DoT, ISP and MEITY are directed to do the needful in terms of the abovesaid decree of permanent injunction dated 08.09.2022.***

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 15th December 2022 read with order dated 08th September 2022 in respect of websites of Defendant no. 25 to 28 as mentioned in column '2' of **Schedule-A** of the Impleadment Application. (Copy enclosed).

ADET (DS-II)
Tel: 011-2303 6760
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. 12) for kind information and necessary action.
- ii. Lawyer/Advocate for the Plaintiffs for kind information.
- iii. DoT Website.

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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**
+ CS(COMM) 418/2019
WARNER BROS. ENTERTAINMENT INC.
..... Plaintiff

Through: Ms.R.Ramya, Ms.Mehr
Sidhu, Advocates

versus

HTTPS://YO-MOVIES.COM & ORS.
..... Defendant

Through: Mr.Azhar Qayum Khan,
Advocate (VC) for Tata
Teleservices Ltd.

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

% **ORDER**
15.12.2022

**I.A. 21402/2022 filed by plaintiff Under Order 1 Rule 10 CPC
seeking impleadment of additional mirrors, redirects or
alpha numeric variations as defendants 25-28 in the memo of
parties.**

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 *ad-interim* injunction in this suit against the defendants vide order dated 09.08.2019 and decree of permanent injunction vide order dated 08.09.2022 for infringement of copyrights with further directions that as and when plaintiff files an application under Order 1 Rule 10 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 09.08.2019 and 08.09.2022 which are also necessary party to this suit. It is further stated that details of proposed defendants has been disclosed in Schedule-A annexed with application and they are also liable to be impleaded as defendant no. 25-28. It is further argued that even decree of permanent injunction dated 08.09.2022 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 defendant 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 injuncted. 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 of Ld. Counsel for the applicant and the directions passed in para no. 26 of the said judgment, the websites mentioned in the prayer clause of the application especially Schedule-A are impleaded as defendant no. 25-28.

Since the newly added defendants are also stated to be involved in violation of copyrights of plaintiff, accordingly the decree of permanent injunction dated 08.09.2022 is also extended

against newly added defendant no. 25-28. The DoT, ISP and MEITY are directed to do the needful in terms of the abovesaid decree of permanent injunction dated 08.09.2022.

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*.

**PURSHOTAM PATHAK (DHJS),
JOINT REGISTRAR (JUDICIAL)**

DECEMBER 15, 2022/sk

Click here to check corrigendum, if any



* IN THE HIGH COURT OF DELHI AT NEW DELHI

Reserved on: 26.08.2022

Date of decision: 08.09.2022

+ CS (COMM) 418/2019 & I.A 10880/2019, I.A. 10882/2019 & I.A. 11014/2022

WARNER BROS. ENTERTAINMENT INCPlaintiff

Through: Ms.Suhasini Raina, Ms.R.Ramya
and Ms.Mehr Sidhu, Advs.

Versus

HTTPS://YO-MOVIES.COM& ORS. Defendants

Through: None.

CORAM:

HON'BLE MR. JUSTICE NAVIN CHAWLA

1. The Plaintiff has filed the present suit *inter-alia* praying for the following reliefs:

“51. In light of the foregoing, it is most respectfully prayed that this Hon’ble Court may be pleased to:

i. Issue an order and decree of permanent injunction restraining the Defendant No. 1 (and such other mirror/redirect/alphanumeric websites discovered to provide additional means of accessing the Defendant Website, and other domains/domain owners/website operators/entities which are discovered to have been engaging in infringing the Plaintiff's exclusive rights), its 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 Plaintiff has copyright,

ii. Issue an order and decree directing the Defendant Nos. 2-10, 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 Defendant No. 1 website identified by the Plaintiff in the instant suit (and such other mirror/redirect/alphanumeric websites discovered to provide additional means of accessing the Defendant Website, and other domains/domain owners/website operators/entities which are discovered to have been engaging in infringing the Plaintiff's exclusive rights)

iii. Issue an order directing the Defendant Nos. 11 and 12, to issue a notification calling upon the various internet and telecom service providers registered under it to block access to the Defendant No. 1 websites identified by the Plaintiff in the instant suit (and such other mirror/redirect/alphanumeric websites discovered to provide additional means of accessing the Defendant Website, and other domains/domain owners/website operators/entities which are discovered to have been engaging in infringing the Plaintiff's exclusive rights);

iv. Issue an order directing the Domain Name Registrars of the Defendant Website identified by the Plaintiff in the Plaintiff to disclose the contact details and other details about the owner of the said websites, and other such relief as this Hon'ble Court may deem fit and proper;”

2. The Plaintiff claims itself to be a global entertainment company under the laws of the State of Delaware, the United States of America, and as being engaged in the business of creation, production, and distribution of motion pictures. The Plaintiff has also received certain



reputed awards, such as the Academy Award for “Best Picture” for “Argo” in 2012.

3. It is the contention of the Plaintiff that the motion pictures produced by the Plaintiff, being works of visual recording and which include sound recordings accompanying such visual recordings, qualify to be a ‘*cinematograph film*’ under Section 2(f) of the Copyright Act, 1957 (in short “the Act”). The Plaintiff claims this Court has jurisdiction by virtue of Section 13(1) read with Sections 13(2) and 5 of the Act, since the Plaintiff’s cinematograph films are released in India, the cinematograph films of the Plaintiff would be entitled to all the rights and protections granted under the provisions of the Act.

4. The claim of the Plaintiff is premised on the allegation of illegal and unauthorized distribution, broadcasting, re-broadcasting, transmission and streaming of the Plaintiff’s original content by the Defendant Nos. 1 and 14 to 24 (hereinafter referred to as the “rogue websites”). It is the case of the Plaintiff that as a result of the unauthorized transmission of their content, the rogue websites infringe the copyright of the Plaintiff in the original works produced by it, which have been granted protection under the provisions of the Act.

5. The Plaintiff has impleaded various Internet Service Providers (in short, “ISPs”) as the Defendant Nos. 2-10 and the concerned departments of the Government of India as the defendant nos. 11 and 12. The ISPs and the concerned departments have been impleaded for the limited relief of compliance with any directions of this Court granted in favor of the Plaintiff.



6. The Plaintiff has alleged that the Defendant Nos.1 & 14 to 24 are the rogue websites. The Plaintiff, vide an investigation conducted by an independent investigator, learnt of the extent of the infringing activity of the rogue websites, in as much as the rogue websites have infringed the Plaintiff's copyright under the provisions of the Act in the original content by unauthorized distribution, broadcasting, re-broadcasting, transmission and streaming and/or by facilitating the use of the rogue websites, *inter alia* by downloading and streaming the Plaintiff's original cinematograph films in which copyright vests.

7. It is also the case of the Plaintiff that a cease-and-desist notice was served on the rogue websites calling upon them to cease from engaging in their infringing activities. Despite the legal notice, the rogue websites continue to infringe the rights of the Plaintiff in its original content.

8. The learned counsel for the Plaintiff presses only for prayers (i), (ii) and (iii), as noted hereinabove, of the plaint. The other reliefs as made in the plaint are not pressed.

9. The learned counsel for the Plaintiff relies upon the judgment passed by a Coordinate Bench of this Court in a batch of petitions dated 10.04.2019, including *UTV Software Communication Ltd. & Ors. v. 1337X.to & Ors.*, 2019 SCC OnLine Del 8002, which deal with the determination of rogue websites.

10. The Plaintiff thereafter filed I.A. 11014 of 2022 under Order XIII A read with Section 151 of the Code of Civil Procedure, 1908 (in short, 'CPC'), as applicable to commercial disputes, seeking a summary judgment. The said application was listed before this Court on 19.07.2022, wherein this Court recorded that the service and pleadings



are complete in regard to all the Defendants and that the rogue websites have neither appeared nor have filed written statements in the present suit proceedings till date. Further, the Hon'ble Court directed the suit to proceed *ex-parte* qua Defendant Nos. 1, 3, 4, 5, 6, 8, 10, 13 to 24 (which includes the rogue websites).

11. The grounds for filing the present application, as enumerated by the Plaintiff in the same, are as follows:

a. That all the Defendants have been duly served by the Plaintiff, however, only the Defendant Nos. 7, 9, 11 and 12 have entered appearance before this Hon'ble Court.

b. That the Defendant Nos. 1 and 14 to 24, being the rogue websites, against whom the Plaintiff is seeking primary relief, are illegally streaming the Plaintiff's content on their websites and even after being duly served by the Plaintiff, have decided not to contest the present suit.

c. That the Defendants have no real prospect of successfully defending the claim of copyright infringement under Section 51 of the Act and have further not chosen to contest the said claim.

d. Additionally, there is no other compelling reason as to why the present suit should not be disposed of before recording of oral evidence particularly in view of the fact that there is no dispute regarding the illegal activities of the Defendant Nos. 1 and 14 to 24 and in any event, in the absence of any challenge or opposition to the factual allegations made in the plaint, in view of provisions of Order VIII Rule 5 of the CPC, there is no occasion for recording of oral evidence in the present matter.



12. The learned counsel for the Plaintiff has relied upon Clause 3 of Chapter XA of the Delhi High Court (Original Side) Rules, 2018 which states the grounds under which a Court can pass a summary judgment.

13. The learned counsel for the Plaintiff has drawn my attention to two affidavits filed by Mr. Manish Vaishampayan, who conducted the investigation with regard to the aforesaid websites on the instance of the Plaintiff, to contend that the said websites need to be treated as rogue websites. With respect to this contention, reliance is placed on the following documentary evidence in support of each of the aforesaid websites:

S.No.	Particulars	Court File Pagination along with Volume Number
1.	Print of Contact Details of various websites as available on WHOIS (primary domains):	
	1)yo-movies.com (Defendant No. 1)	Pg. 314-316 Folder IV (Vol. 2)
	2)Yomovies.it (Defendant No. 14)	I.A. No. 18420/2019 Pg. No. 232-234
	3) Todayprizes1.life (Defendant No.15)	I.A. No. 18420/2019 Pg. No. 238-241
	4) Yomovies.co.in (Defendant No. 16)	I.A. No. 18420/2019 Pg No. 235-237
	5) Yomovies.xyz (Defendant 17)	I.A. No. 8892/2020 Pg. No. 109-111(Vol.1)
	6) Yomovies.pro	I.A No. 8892/2020



	(Defendant 18)	Pg. No. 126-128(Vol.1)
	7) Yomovies.club (Defendant 19)	I.A No. 8892/2020 Pg. No. 218- 221(Vol.1)
	8) Yomovies.to (Defendant 20)	I.A No. 8892/2020 Pg. No. 311-312
	9) Yomovies.site (Defendant 21)	I.A No. 8892/2020 Pg. No. 306-308(Vol.2)
	10) Yomovies.pe (Defendant 22)	I.A No. 12641/2021 Pg. No. 94-95
	11) Yomovies.is (Defendant 23)	I.A No. 12641/2021 Pg. No. 98-100
	12) Yomovies.so (Defendant 24)	I.A No. 12641/2021 Pg. No. 103-105
2.	Copies of proof of ownership of movie titles	
	a) Aquaman (Warner)	Pg.27-28 Folder IV (Vol.1)
3.	Screenshots of Homepage of various websites (primary domains):	
	1)yo-movies.com (Defendant No. 1)	Pg.292-295 Folder IV (Vol. 2)
	2)Yomovies.it (Defendant No.14)	I.A. No. 18420/2019 Pg.38-52
	3) Todayprizes1.life (Defendant No.15)	I.A. No. 1842/2019 Pg.64-68
	4)Yomovies.co.in (Defendant No. 16)	I.A. No. 18420/2019 Pg 159-163



	5)yomovies.xyz (Defendant No. 17)	I.A. No. 8892/2020 Pg.37-43 (Vol.1)
	6) yomovies.pro (Defendant No. 18)	I.A No. 8892/2020 Pg. 112-115 (Vol.1)
	7) yomovies.club (Defendant No. 19)	I.A No. 8892/2020 Pg. 129-133(Vol.1)
	8) yomovies.site (Defendant No. 21)	I.A No. 8892/2020 Pg. 222-231(Vol.2)
	9) Yomovies.pe (Defendant 22)	I.A No. 12641/2021 Pg. No. 42-48
4.	Printout of proof of infringement by websites (primary domains):	
	1)yo-movies.com (Defendant No. 1)	Pg.302-313 Folder IV (Vol. 2)
5.	Printouts of the DMCA, FAQ, etc. pages, evidencing infringing nature of the Defendant Websites:	
	1)yo-movies.com (Defendant No. 1) DMCA	Pg. 298-299 Folder IV(Vol.2)
	2)yo-movies.com (Defendant No. 1) Contact Us	Pg.300-301 Folder IV(Vol.2)

14. I have heard the learned counsel for the Plaintiff.



15. In *UTV Software (supra)*, a Coordinate Bench of this Court, as far as rogue websites are concerned, identified the following illustrative factors to be considered in determining whether a particular website falls within that class:

“59. In the opinion of this Court, some of the factors to be considered for determining whether the website complained of is a FIO/L/Rogue Website are:-

a. whether the primary purpose of the website is to commit or facilitate copyright infringement;

b. the flagrancy of the infringement, or the flagrancy of the facilitation of the infringement;

c. Whether the detail of the registrant is masked and no personal or traceable detail is available either of the Registrant or of the user.

d. Whether there is silence or inaction by such website after receipt of take down notices pertaining to copyright infringement.

e. Whether the online location makes available or contains directories, indexes or categories of the means to infringe, or facilitate an infringement of, copyright;

f. Whether the owner or operator of the online location demonstrates a disregard for copyright generally;

g. Whether access to the online location has been disabled by orders from any court of another country or territory on the ground of or related to copyright infringement;

h. whether the website contains guides or instructions to circumvent measures, or any order of any court, that disables access to the website on the ground of or related to copyright infringement; and i. the volume of traffic at or frequency of access to the website;

j. Any other relevant matter.

60. This Court clarifies that the aforementioned factors are illustrative and not exhaustive and do not apply to intermediaries as they are governed by IT Act, having statutory immunity and function in a wholly different manner.

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69. Consequently, the real test for examining whether a website is a Rogue Website is a qualitative approach and not a quantitative one.”

16. This Court, in *UTV Software* (*supra*) further held as under:

“29. It is important to realise that piracy reduces jobs, exports and overall competitiveness in addition to standards of living for a nation and its citizens. More directly, online piracy harms the artists and creators, both the struggling as well as the rich and famous, who create content, as well as the technicians-sound engineers, editors, set designers, software and game designers-who produce it and those who support its marketing, distribution and end sales. Consequently, online piracy has had a very real and tangible impact on the film industry and rights of the owners.

30. The Indian Copyright Act, 1957 (“the Copyright Act”) confers a bundle of exclusive rights on the owner of a “work” and provides for remedies in case the copyright is infringed.

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34. The above definitions make it clear that making any work available for being seen or heard by the public whether simultaneously or at places chosen individually, regardless of whether the public actually sees the film, will constitute communication of the film to the public. The intent was to include digital copies of works, which would include within its scope digital copies of works being made available online (as opposed to the physical world). Communication can be by various means such as directly or by display or diffusion. In this context, definition of “broadcast” is also relevant which identifies communication to public by wireless diffusion or by wire. Thus, making available of a film for streaming or downloads in the form of digital copies on the internet is within the scope of “communication to the public”.

35. It is pertinent to note that the definition of “communication to the public” was first added in the Copyright Act by the 1983 Amendment and was as follows:-



“Communication to the public” means communication to the public in whatever manner, including communication through satellite”.

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53. Also should an infringer of the copyright on the Internet be treated differently from an infringer in the physical world? If the view of the aforesaid Internet exceptionalists school of thought is accepted, then all infringers would shift to the e-world and claim immunity!

54. A world without law is a lawless world. In fact, this Court is of the view that there is no logical reason why a crime in the physical world is not a crime in the digital world especially when the Copyright Act does not make any such distinction.

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80. In the opinion of this Court, while blocking is antithetical to efforts to preserve a “free and open” Internet, it does not mean that every website should be freely accessible. Even the most vocal supporters of Internet freedom recognize that it is legitimate to remove or limit access to some materials online, such as sites that facilitate child pornography and terrorism. Undoubtedly, there is a serious concern associated with blocking orders that it may prevent access to legitimate content. There is need for a balance in approach and policies to avoid unnecessary cost or impact on other interests and rights. Consequently, the onus is on the right holders to prove to the satisfaction of the Court that each website they want to block is primarily facilitating wide spread copyright infringement.

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82. One can easily see the appeal in passing a URL blocking order, which adequately addresses over-blocking. A URL specific order need not affect the remainder of the website. However, right-holders claim that approaching the Court or the ISPs again and again is cumbersome, particularly in the case of websites promoting rampant piracy.

83. This Court is of the view that to ask the plaintiffs to identify individual infringing URLs



would not be proportionate or practicable as it would require the plaintiffs to expend considerable effort and cost in notifying long lists of URLs to ISPs on a daily basis. The position might have been different if defendants' websites had a substantial proportion of non-infringing content, but that is not the case.

84. This Court is of the view that while passing a website blocking injunction order, it would have to also consider whether disabling access to the online location is in the public interest and a proportionate response in the circumstances and the impact on any person or class of persons likely to be affected by the grant of injunction. The Court order must be effective, proportionate and dissuasive, but must not create barriers to legitimate trade. The measures must also be fair and not excessively costly (See: *Loreal v. Ebay*, [Case C 324/09]).

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86. Consequently, website blocking in the case of rogue websites, like the defendant-websites, strikes a balance between preserving the benefits of a free and open Internet and efforts to stop crimes such as digital piracy.

87. This Court is also of the opinion that it has the power to order ISPs and the DoT as well as MEITY to take measures to stop current infringements as well as if justified by the circumstances prevent future ones.”

16. It is notable that the Plaintiff had filed similar application under Order XIII A of the CPC (as applicable to commercial disputes) in similar suit, being ***Warner Bros. Entertainment Inc. Vs. <https://Otorrents.Com> & Ors.*** (CS (COMM) 367 of 2019), ***Warner Bros. Entertainment Inc. Vs. <https://www2.Filmlinks4u> & Ors.*** (CS (COMM) 368 of 2019), ***Warner Bros. Entertainment Inc. Vs. <http://Mp4moviez.Io> & Ors.*** (CS (COMM) 399 of 2019) and ***Warner Bros. Entertainment Inc. vs. <https://TAMILROCKERMovies.COM> & Ors.*** (CS (COMM) 419 of



2019), wherein the Hon'ble Court relying on the *UTV Software Communication Ltd. (supra)* has decreed the suit in favour of the Plaintiff.

17. Vide order dated 09.08.2019, this Court had granted an *ex-parte ad-interim* injunction against the Defendant No. 1 (and such other domains/domain owners/website operators/entities which are discovered during the course of the proceedings to have been engaging in infringing the Plaintiff's exclusive rights), 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, are restrained from, hosting, streaming, reproducing, distributing, making available to the public and/or communicating to the public, or facilitating the same, in any manner, on their websites, through the internet any cinematograph work/content/programme/ show in relation to which Plaintiff has copyright.

18. Vide the same order, this Court had directed the Defendant Nos. 2 to 10 to block the domain name 'yo-movies.com' and its URL <https://yo-movies.com> with the IP address 104.27.132.165 and 104.27.133.165. This Court further directed the Defendant Nos. 11 and 12 to suspend the above-mentioned domain name registration of the Defendant No. 1 and issue requisite notifications calling upon various internet and telecom service providers registered under them to block the aforementioned website identified by the Plaintiff.

19. The learned counsel for the Plaintiff submits that pursuant to the *ex-parte ad interim* order dated 09.08.2019, the Defendant No. 11 has issued a notification. The learned counsel for the Plaintiff further states



that the Defendant Nos. 2 to 10 have blocked the rogue websites, that is, Defendant No. 1's websites.

20. Also, vide the same order, this Court observed as follows:

"21. 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 Plaintiff file an application under Order I Rule 10 for impleadment of such websites, Plaintiff shall file an affidavit confirming that the newly impleaded website is mirror/redirect/alphanumeric website 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 directions to the ISPs to disable access in India to such mirror/redirect/alphanumeric websites".

21. In light of the aforesaid direction, the Plaintiff filed applications under Order I Rule 10 of CPC for the impleadment of the Defendant Nos.14-16 (I.A. 18420 of 2019), Defendant Nos. 17-21 (I.A. 8892 of 2020) and Defendant Nos. 22-24 (I.A. 12641 of 2021) in the present suit proceedings, which were allowed by this Court and the *ex-parte ad-interim* order dated 09.08.2019 was thereby extended to the Defendant Nos.14 to 16,17 to 21 and 22 to 24 vide orders dated 24.12.2019, 08.10.2020 and 04.10.2021 respectively.

22. Thereafter, on 09.05.2022, the learned Joint Registrar (Judicial), passed the following order in regard to the rogue websites, that is, Defendant Nos. 14 to 24: -

"....All of the contesting defendants against whom substantial relief has been sought by the plaintiff have been served, however they have not



preferred to appear to contest this case or to file written statement and affidavit of admission/denial of documents. In this regard law shall take its own course.

Learned counsel for plaintiffs submits that there is no document for admission/denial of documents. Hence, pleadings stand complete.

Other defendants who were supposed to comply with interim directions have already complied with.

Let the matter be placed before the Hon'ble Court for further direction on 19.07.2022..”

23. Since the Defendant Nos. 1, 14 to 24 are not appearing, despite notice, in my opinion, the suit can be heard and decided summarily. The Defendant Nos. 1, 14 to 24 have no real prospect of successfully defending the claim of copyright infringement and have further not chosen to contest the said claim. The present matter is mainly concerned with the enforcement of the injunction orders which are passed against the rogue websites who do not have any defense to the claim of copyright infringement but use the anonymity offered by the internet to engage in illegal activities, such as copyright infringement in the present case. This is a fit case for passing a summary judgment invoking the provisions of Order XIII A of CPC, as applicable to the commercial disputes.

24. In *UTV Software (supra)*, the Court also examined the issue of grant of dynamic injunctions and permitted subsequent impleadment of mirror/redirect/alphanumeric websites which provide access to the rogue websites, by filing an application under Order I Rule 10 of the CPC before the learned Joint Registrar (Judicial) alongwith an affidavit with supporting evidence, confirming that the proposed website is mirror/redirect/alphanumeric website of the injuncted defendant websites.

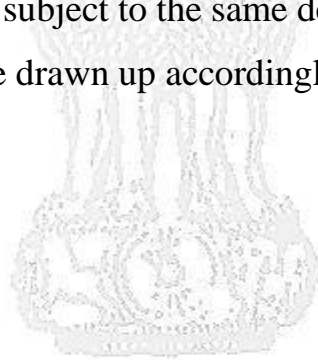


At the request of the counsel for the Plaintiff, the same directions are liable to be made in this case also.

25. Accordingly, I.A. No. 11014 of 2022 under Order XIII A, as applicable to commercial disputes, seeking a Summary Judgment is allowed. All the pending applications are also disposed of.

26. The suit is, therefore, decreed in terms of prayers (i), (ii) and (iii) of the Plaint. The Plaintiff is also permitted to implead any mirror/redirect/alphanumeric websites which provide access to the Defendants Nos. 1, 14 to 24 websites by filing an appropriate application under Order I Rule 10 of the CPC, supported by affidavits and evidence as directed in *UTV Software (supra)*. Any website impleaded as a result of such application will be subject to the same decree.

27. Let a decree sheet be drawn up accordingly.



NAVIN CHAWLA, J.

SEPTEMBER 8, 2022/ai

सत्यमेव जयते

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

IA NO. OF 2022

IN

CS(COMM) NO. 418 OF 2019

IN THE MATTER OF

Warner Bros. Entertainment Inc. ...Plaintiff

Versus

HTTPS://YO-MOVIES.COM & Ors. ...Defendants

JURISDICTION VALUE – 2,00,01,600/-

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Place: New Delhi

Date: 12th December, 2022



Suhasini Raina (D/2982/2011)
Saikrishna & Associates
Advocates for the Plaintiff
57, Jor Bagh,
Delhi – 110003

Note: The present application is being filed in a Website blocking suit. The Email ID of newly impleaded websites i.e. Defendant Nos.25 to 28 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 the supporting affidavit of Plaintiff's counsel is filed herewith. The copy of the Emails has been attached herewith as proof of service along with the affidavit of service at Pg__.

The Judgements and Orders filed herewith are integral to the application and are therefore filed along with the application.

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

I.A. NO. _____ OF 2022

IN

CS(COMM) NO 418 OF 2019

IN THE MATTER OF:

Warner Bros. Entertainment Inc. ...Plaintiff

Versus

HTTPS://YO-MOVIES.COM & 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 14th December 2022 or any date thereafter. Please take note accordingly.

Place: New Delhi

Date: 12th December, 2022



Suhasini Raina (D/2982/2011)
Saikrishna & Associates
Advocates for the Plaintiff
57, Jor Bagh,
Delhi – 110003

IN THE HIGH COURT OF DELHI AT NEW DELHI

I.A. NO. _____ OF 2022
IN
CS(COMM) NO 418 OF 2019

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

IN THE MATTER OF:

Warner Bros. Entertainment Inc. ...Plaintiff

Versus

HTTPS://YO-MOVIES.COM & 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 08.09.2022 passed by this Hon'ble Court in the instant suit. The relevant portion of the said Judgment has been extracted herein below:

26.The suit is, therefore, decreed in terms of prayers (i), (ii) and (iii) of the Plaint. The Plaintiff is also permitted to implead any mirror/redirect/alphanumeric websites which provide access to the Defendants Nos. 1, 14 to 24 websites by filing an appropriate application under Order I Rule 10 of the CPC, supported by affidavits and evidence as directed in UTV Software (supra). Any

website impleaded as a result of such application will be subject to the same decree.

As prayed.

Yours faithfully,

Place: New Delhi
Date: 12th December, 2022



Suhasini Raina (D/2982/2011)
Saikrishna & Associates
Advocates for the Plaintiff
57, Jor Bagh,
Delhi – 110003

GOVERNMENT OF NCT OF DELHI
e-Court Fee



DATE & TIME :	09-DEC-2022 14:51:26
NAMES OF THE ACC/ REGISTERED USER :	SHCIL
LOCATION :	DELHI HIGH COURT
e-COURT RECEIPT NO :	DLCT0940L2250O674
e-COURT FEE AMOUNT :	₹ 20 (Rupees Twenty Only)



DLCT0940L2250O674

Statutory Alert : The authenticity of this e-Court fee receipt should be verified at www.shcilestamp.com . Any discrepancy in the details on this receipt and as available on the website renders it invalid. In case of any discrepancy please inform the Competent Authority. This receipt is valid only after verification & locking by the Court Official.

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

I.A. NO. _____ OF 2022

IN

CS(COMM) NO 418 OF 2019

IN THE MATTER OF:

Warner Bros. Entertainment Inc. ...Plaintiff

Versus

HTTPS://YO-MOVIES.COM & Ors. ...Defendants

APPLICATION ON BEHALF OF THE PLAINTIFF 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. Plaintiff has 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. Yomovies.tel
26. Yomovies.cloud
27. Yomovies.fyi
28. Yomovies.ink

(hereinafter referred to as ‘Proposed Defendant Websites’) as Defendant Nos. 25-28. The additional mirrors/redirects/alphanumeric variations, who the Plaintiffs are proposing to implead in the present suit are engaged in the business of hosting, streaming, broadcasting, 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. 13) 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 34 of the Plaint.

4. It is submitted that vide Order dated 24.12.2019, 08.10.2020 and 04.10.2021 the Learned Joint Registrar was pleased to pass an order impleading Defendant Nos. 14 to 16, 17 to 21 and 22 to 24 respectively. In accordance with the Judgment dated 08.09.2022, Plaintiff is seeking to implead the present Defendants as Defendant Nos 25-28.

5. It is submitted that *vide* Order dated 09.08.2019, 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:

“20. Consequently, Defendants Nos. 1 (and such other domains/domain owners/website operators/entities which are discovered during the course of the proceedings to have been engaging in infringing the Plaintiff’s exclusive rights), 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, are restrained from, hosting, streaming, reproducing, distributing, making available to the public and/or communicating to the public, or facilitating the same, in any manner, on their websites, through the internet any cinematograph work/content/programme/show in relation to which Plaintiff has copyright;

21. 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 Plaintiff files an application under Order I Rule 10 for impleadment of such websites, Plaintiff shall file an affidavit confirming that the newly impleaded website is mirror/redirect/alphanumeric website 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 directions to the ISPs to

disable access in India to such mirror/redirect/alphanumeric websites.

22. *Defendant Nos. 2-10, shall ensure compliance of this order by blocking, the websites, their URL's and the respective IP address as under:*

LIST OF WEBSITES

<i>Domain Name</i>	<i>URL</i>	<i>IP Address</i>
<i>Yo-movies.com</i>	https://yo-movies.com	104.27.132.165 104.27.133.165

Further, Defendant Nos. 11 and 12 are directed to suspend the aforementioned domain name registration of Defendant No. 1 and issue requisite notifications within 5 working days calling upon various internet and telecom service providers registered under them to block the aforementioned websites identified by Plaintiff.”

Copy of the Order dated 09.08.2019 is attached herewith.

6. Plaintiff in collaboration with 6 other studios had instituted 8 suits for Copyright Infringement against 30 infringing domains that were communicating to the public, Plaintiff's 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. Plaintiff 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 enjoined 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
FIOLs."*

(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.

7. It is submitted that the Proposed Defendant Websites are hydra headed websites and are making available and communicating Plaintiff's Copyrighted material in which Plaintiff has an exclusive right without permission and authorization. It is submitted that since these websites are showing Plaintiff's content without authorization, these Proposed Defendant Websites fall squarely within the scope of the Judgement dated 10.04.2019 passed and the Plaintiff is entitled to seek their impleadment and extension of the injunction Order.
8. Plaintiff obtained a permanent injunction against the Defendant Websites, vide judgment dated 08.09.2022. It is submitted that this Hon'ble Court was pleased to record that

the Defendant Websites are Rogue Websites and further held that such impleadment application under Order 1 Rule 10 along with evidence against them following the Judgment dated 08.09.2022. The relevant portion of the Judgment is reiterated hereinbelow:

26. The suit is, therefore, decreed in terms of prayers (i), (ii) and (iii) of the Plaint. The Plaintiff is also permitted to implead any mirror/redirect/alphanumeric websites which provide access to the Defendants Nos. 1, 14 to 24 websites by filing an appropriate application under Order I Rule 10 of the CPC, supported by affidavits and evidence as directed in UTV Software (supra). Any website impleaded as a result of such application will be subject to the same decree.

9. In the light of the above and in accordance with the judgment dated 08.09.2022, it is imperative to implead the Proposed Defendant Websites. This Hon'ble Court ought to extend the permanent injunction against the Proposed Defendant Websites. Further, the evidence produced by the Plaintiff, establishes that the Defendant websites are merely providing a new means of accessing the same primary infringing websites that have been enjoined. Therefore, the said Defendants websites ought to be blocked, and that this Hon'ble Court ought to issue directions to the ISPs to disable access to the Defendant Websites. Further, this Hon'ble Court in its

Judgment dated 10.04.2019 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 injuncted... ”

10. It is submitted that the Plaintiff has, 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.
11. 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 Plaintiff.

PRAYER:

12. In view of the above, Plaintiff humbly prays 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 *Defendant Nos.25-28*, to the instant suit and extend the permanent injunction dated 08.09.2022 ;

- b. Pass an order directing the Defendants No. 2 to 10, 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 Defendant Nos. 11 and 12, 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 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.

It is prayed accordingly.



Place: New Delhi
Date: 12th December, 2022

Suhasini Raina (D/2982/2011)
Saikrishna & Associates
Advocates for the Plaintiff
57, Jor Bagh, Delhi – 110003

SCHEDULE A

Injuncted Website Location (at Time of Suit)	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
<u>yo-movies.com</u> yomovies.it Todayprizes1.life	https://yomovies.tel	yomovies.tel	104.21.68.3
yomovies.co.in yomovies.xyz yomovies.pro	http://yomovies.cloud	yomovies.cloud	104.21.5.210
yomovies.club yomovies.to yomovies.site	https://yomovies.fyi	yomovies.fyi	172.67.133.217
https://yomovies.p e/ https://yomovies.i s https://yomovies.s o/	http://yomovies.ink	yomovies.ink	104.21.75.54
			172.67.214.210
			172.67.178.221
			104.21.17.239

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

I.A. NO. _____ OF 2022

IN

CS(COMM) NO 418 OF 2019

IN THE MATTER OF:

Warner Bros. Entertainment Inc. ...Plaintiff

Versus

HTTPS://YO-MOVIES.COM & Ors. ...Defendants

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

I, the above-named deponent, do hereby solemnly affirm and declare as under:

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



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.

[Signature]
DEPONENT

[Signature]
I identified the deponent who has signed in my presence.

VERIFICATION:
Verified at New Delhi on this day of 08th December 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.

CERTIFIED THAT I have read the contents of the affidavit which have been read & explained to him/her and are true & correct to his/her knowledge.

Identified by Smt./Sri. Mehar Sidhu Adv.
Has solemnly affirmed before me at Delhi on 08 DEC 2022 at Sl. No. 246

[Signature]
DEPONENT