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-07/2022-DS-II

Dated: 19-12-2022

To,

All Internet Service Licensee's

Subject: CS (COMM) No. 116 of 2022; Universal City Studios LLC. & Ors. v/s 123movieshub.tc & ors. before Hon'ble Delhi High Court.

In continuation to Department of Telecommunications (DoT) even no. letter dated 25.02.2022, kindly find the attached Hon'ble Delhi High Court order dated 06th December, 2022 & 21st February, 2022 in the subject matter court case C.S. (Comm) No. 116 of 2022 along with amended memo of parties for compliance in respect of blocking of website of defendant no. 47. Wherein DoT is defendant No. 44 in the case.

- 2. Hon'ble Court in order dated21st February, 2022 has, inter alia, directed that:
 - 26. They shall do so within 24 hours of the receipt of the order. The defendants No.44 and 45 are directed to issue notifications calling upon the telecom service providers registered under them to disable access into India of the websites of defendants No.1 to 34 within 36 hours of the receipt of the order.
- 3. Now, Hon'ble Court vide order dated06th December, 2022 has, inter alia, directed that:
 - I.A. No.20388/2022 filed on behalf of plaintiff's under Order 1 Rule 10 CPC seeking impleadment of Additional Mirrors, Redirects or Alphanumeric Variations as defendant no. 47 in the Memo of Parties.
 - In view of the submissions and judgment relied upon by learned counsel for applicant, the website mentioned in the prayer clause of the application is **impleaded as defendant no. 47.**

Since the newly added defendant is also stated to be involved in violation of copyrights of plaintiff, accordingly ex-parte Permanent Injunction dated 12.03.2020 is also extended against newly added defendant no. 47. The DoT, ISPs and MEITY are directed to do the needful in terms of the abvoesaid decree of permanent injunction dated 21.02.2022.

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 in respect of blocking of website of defendant no. 47, as mentioned in amended memo of parties/Schedule-A (Copy attached) of the impleadment application.

Director (DS-II) Tel: 011-2303 6860 Email: dirds2-dot@nic.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 for kind information and necessary action (Respondent no. 45 in the case)
- ii. Sh. Rakesh Kumar, CGSC, for kind information.
- iii. Lawyer/advocate for the plaintiff for kind information.
- iv. DoT website.

\$~13

IN THE HIGH COURT OF DELHI AT NEW DELHI

+ CS(COMM) 116/2022

UNIVERSAL CITY STUDIOS LLC. & ORS.

..... Plaintiff

Through: Ms. Prakriti, Ms. Aastha & Ms. Nida,

Advocates

versus

123MOVIESHUB.TC & ORS.

..... Defendant

Through: Mr. Rakesh Kumar, CGSC

with Mr. Sunil Adv. for D-34&35

CORAM:

JOINT REGISTRAR (JUDICIAL) SH. PURSHOTAM PATHAK

(DHJS)

ORDER 06.12.2022

%

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

I.A. No.20388/2022 filed on behalf of plaintiff's under Order 1 Rule 10 CPC seeking impleadment of Additional Mirrors, Redirects or Alphanumeric Variations as defendant no. 47 in the Memo of Parties.

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 21.02.2022 for infringement of copyrights.

It is stated that after passing of the abovesaid judgment, other website, as disclosed in application, has also started violation and it is mirrors, redirects or alphanumeric variations of the website blocked pursuant to the order dated

21.02.2022 and is also necessary party to this suit. It is further stated that details of proposed defendant has been disclosed in application and it is also liable to be impleaded as defendant no. 47. It is further argued that even decree of permanent injunction dated 21.02.2022 is also liable to be extended against it 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. 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 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

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 Courtfees. 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 defendant/website is 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 website mentioned in the prayer clause of the application is impleaded as defendant no. 47.

Since the newly added defendant is also stated to be involved in violation of copyrights of plaintiff, accordingly *ex-parte* Permanent Injunction dated 12.03.2020 is also extended against newly added defendant no. 47. The DoT, ISPs and MEITY are directed to do the needful in terms of the abvoesaid decree of permanent injunction dated 21.02.2022.

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.

I.A. No.20389/ 2022 filed on behalf plaintiffs under Section 151 CPC allowing an exemption to the plaintiffs from filing the certified/clearer/proper/translated/original copies of documents with proper margins

Heard.

Allowed, subject to just exceptions to be filed within four weeks.

I.A. stands disposed of.

CS(COMM) 116/2022

The right of defendant no. 1 to 34, 38, 39, 40, 44 & 45 to file written statement is already closed.

Defendant no. 35 to 37, 41 to 43 have not filed the written statement. Let the same be filed as per rules with advance copy to opposite party.

Replication thereto be filed thereafter.

Issue summons to newly impleaded defendant no. 47 on filing of PF, through all permissible modes, returnable on next date of hearing.

Put up for completion of service/pleadings on 23.01.2023.

SH. PURSHOTAM PATHAK (DHJS), J

DECEMBER 6, 2022

Click here to check corrigendum, if any

\$~15

* IN THE HIGH COURT OF DELHI AT NEW DELHI

+ CS(COMM) 116/2022

UNIVERSAL CITY STUDIOS LLC. & ORS. Plaintiffs

Through: Mr. Saikrishna Rajagopal, Mr

Sidharth Chopra, Ms. Suhasini Raina, Ms. Disha Sharma & Ms. Sanidhya

Rao, Advocates.

Versus

123MOVIESHUB.TC & ORS.

..... Defendants

Through: None.

CORAM:

HON'BLE MS. JUSTICE ASHA MENON

ORDER 21.02.2022

%

I.A. 2718/2022 (exemption)

- 1. Allowed, subject to all just exceptions.
- 2. The application stands disposed of.

I.A. 2719/2022 (of the plaintiffs seeking exemption from issuing notice to the defendant No. 44, Department of Telecommunications (DoT) and defendant No. 45, the Ministry of Electronics and Information Technology (MEITY) under Section 80 CPC)

- 3. For the reasons stated in the application, the same is allowed and the plaintiffs are exempted from serving advance notice to defendants No.44 and 45 under Section 80 CPC.
- 4. The application stands disposed of.

I.A. 2720/2022 (of the plaintiffs under Section 12A of the Commercial Courts Act, 2015 read with Section 151 CPC seeking exemption from instituting pre-suit mediation)

- 5. For the reasons stated in the application, the same is allowed and the plaintiffs are exempted from instituting pre-institution mediation.
- 6. The application stands disposed of.

CS(COMM) 116/2022, I.A. 2717/2022 (of the plaintiffs under Order XXXIX Rules 1 and 2 read with Section 151 CPC restraining infringement of copyright)

- 7. This is a suit for permanent injunction, rendition of accounts, damages IPR, copyright etc. filed by six plaintiffs, namely, (i) Universal City Studios LLC., (ii) Warner Bros. Entertainment Inc., (iii) Columbia Pictures Industries, Inc., (iv) Netflix Studios, LLC, (v) Paramount Pictures Corporation and (vi) Disney Enterprises, Inc.
- 8. The defendants No.1 to 34 are described as rogue websites indulging in online piracy by permitting access to illegal downloads of the movies of the plaintiffs. Defendants No.35 to 43 are Internet Service Providers ('ISPs'), defendant No. 44 is the Department of Telecommunications ('DoT') and defendant No.45 is the Ministry of Electronics and Information Technology ('MEITY').
- 9. The suit has been filed with the prayer for permanent injunction restraining defendants No.1 to 34 or any such other mirror/redirect/alphanumeric website which appears to be associated with any of these websites 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

CS(COMM) 116/2022 Page 2 of 17

any manner whatsoever, any cinematograph work/content/program/show in relation to which the plaintiffs have copyright.

10. Mr. Saikrishna Rajagopal, learned counsel for the plaintiffs submits that the suit is maintainable in the present form, as the plaintiffs have been affected by these rogue websites on account of the unlawful streaming of their creative and original work and thus, there were common facts and questions of law involved. Reliance has been placed on the decision of a Division Bench of this Court in Microsoft Corporation and Anr. vs. Sujan Kumar and Ors. [order dated 04th February, 2016 in RFA(OS)(COMM) 1/2016], to submit that if separate Court fee was paid as has been done in the present matter, the suit in the present form was maintainable. It is also submitted that in similar suits filed, interim protection has also been granted (reference is made to the orders in Disney Enterprises Inc. & Ors. vs. Kimcartoon.to & Ors. [order dated 27th July, 2020 in CS 275/2020], Universal City Studios LLC and Ors. vs. Myflixer.to and Ors. [order dated 31st August, 2021 in CS (COMM) 401/2021], Universal City Studios LLC and Ors. vs. Dramacool.news and Ors. [order dated 26th November, 2021 in CS (COMM) 605/2021], and Disney Enterprises Inc. & Ors. **Rlsbb.unblocked.ltda & Ors.** [judgement dated 12th March, 2020 in CS(COMM) 594/2019]

11. Order I Rule 1 CPC reads as under:

"ORDER I

Parties to Suits

1. Who may be joined as plaintiffs.—All persons may be joined in one suit as plaintiffs where—

- (a) any right to relief in respect of, or arising out of, the same act or transaction or series of acts or transactions is alleged to exist in such persons, whether jointly, severally or in the alternative; and
- (b) if such persons brought separate suits, any common question of law or fact would arise."
- 12. Learned counsel for the plaintiffs has laid emphasis on the fact that since the plaintiffs were aggrieved by the same act or series of acts, on the basis of which the copyrights in their works were being infringed by the rogue websites, the suit was maintainable also in terms of Order I Rule 1(a) CPC and that in any case, bringing separate suits would only add to the burden of the court and which could be avoided as common questions of law as well as facts would arise. Reference was made to para Nos. 57 and 58 of the plaint to explain that all the defendants have been joined in the present suit on this ground and the cause of action has arisen from making available "identical contents" on these websites.
- 13. This Court is unable to accept the submissions made. The plaintiffs are different corporate entities. They may have a common grievance against the defendants for uploading and streaming their copyrighted work without authority or license, but the similarity in reliefs claimed against the defendants would not suffice for the plaintiffs to join hands in a single action. Though in para 58 it is claimed by all the plaintiffs that the "cause of action has arisen from making available identical content on the defendant Websites and thus, the Plaintiffs have joined all the defendant Websites in the present suit", this is *ex-facie* incorrect, as the creative content of each

CS(COMM) 116/2022 Page 4 of 17

plaintiff is not identical to that of the other. What is identical is the allegation that copyright has been infringed. There is no identity of copyright, the work, the infringement of each work of the plaintiffs by each one of the defendants. Thus, the requirements of Order I Rule 1(a) & (b) CPC are not met in the present suit and all of the plaintiffs could not join in one suit, even against a similar set of defendants.

14. The decision in *Microsoft Corporation and Anr* (supra) related to the mis-joinder of the defendants, as also the mis-joinder of the causes of action. However, in that case, the rejection of the plaint on the ground of misjoinder of defendants and the causes, was found not to be proper. However, subsequently, the parties settled the matter in the RFA (OS) (COMM) 1/2016. In the judgment of the learned Single Judge from which *Microsoft* Corporation and Anr (supra) had arisen and which is reported as Microsoft Corporation v. Sujan Kumar, 2015 SCC OnLine Del 14356, it was observed that when various subject matters were joined in one suit which essentially formed different causes of action, then under Section 17 of the Court Fee Act, 1860, separate court fee was required to be paid. Furthermore, it was observed that when the plaintiffs claimed common questions of law and facts to file a single suit qua separate defendants who were separate legal entities, the facts and causes were to be pleaded separately qua different defendants. In the present case, learned counsel for the plaintiffs has submitted that separate court fees in respect of each of the plaintiffs had been paid and that therefore, the requirements of law were met in the present case. But paying requisite court fees cannot validate what is not within the procedure prescribed.

CS(COMM) 116/2022 Page 5 of 17

- 15. Even though it is clear that the suit does not fall within the prescription of Order Rule 1(a) or/and (b) CPC, there is no doubt that the court cannot reject the suit on the ground of this "procedural objection". It is also evident from Order I Rule 2 that where it appears to the court that any joinder of plaintiffs may embarrass or delay the trial of the suit, the court may put the plaintiffs to their election to or order separate trials or "make such other order as may be expedient". This clarifies the position that where several plaintiffs are joined in a suit, even improperly, the suit cannot be rejected. The Supreme Court in *Prem Lala Nahata and Anr. vs. Chandi Prasad Sikaria* 2007 (2) SCC 551) has observed
 - "16.....there is no such prohibition or a prevention at the entry of a suit defective for misjoinder of parties or of causes of action. The court is still competent to try and decide the suit, though the court may also be competent to tell the plaintiffs either to elect to proceed at the instance of one of the plaintiffs or to proceed with one of the causes of action..."
- 16. The court will have to use its discretion to allow the plaintiffs to elect and thereafter to order separate trials. It is an option available with this Court therefore to direct the splitting of the suits specifically for each of the plaintiffs and direct separate trial in each suit.
- 17. But the court also has power to consolidate suits in appropriate cases. The purpose of such consolidation is not just for deciding common questions of law or fact but also for "other reasons" including convenience in decision making (see: *Prem Lala Nahata (supra)* relying on Halsbury's Laws of England, Vol. 37, para 69). Ultimately, in the present set of matters, if the

CS(COMM) 116/2022 Page 6 of 17

court were to direct the plaintiffs to file separate plaints in view of the observations hereinabove, since the reliefs claimed are against the same set of defendants, namely, of injunction against them, restraining them from violating the copyrights of each of the plaintiffs, in their various creative works and if some commonality of evidence is disclosed, this Court would not be powerless to direct consolidation of the suits for trial and disposal at a subsequent stage.

- 18. It is for that reason alone that the court is inclined not to direct the splitting up of this particular suit as separate suits to be numbered as such, also in the light of the fact that separate court fees has been paid. But it is not a practice that can be encouraged.
- 19. Thus, the present plaint be registered as a suit.
- 20. Issue summons in the suit and notice in the application to the defendants by all permissible modes, returnable before the Joint Registrar.
- 21. The summons shall indicate that the written statement(s) to the suit and reply(ies) to the application be filed by the defendants within thirty days from the date of receipt of the summons. The defendants shall also file the affidavit of admission/denial of the document(s) filed by the plaintiffs, failing which the written statement(s) shall not be taken on record.
- 22. The plaintiffs are at liberty to file replication(s) to the written statement(s) and rejoinder(s) to the reply(ies) filed by the defendants within thirty days from the filing of the written statement(s)/reply(ies). The replication(s) shall be accompanied by the affidavit of admission/denial in respect of the documents filed by the defendant(s), failing which the replication(s) shall not be taken on record

- 23. If any of the parties wish to seek inspection of any documents, the same shall be sought and given within the time lines.
- 24. Learned counsel for the plaintiffs seeks interim direction to the defendants No.44 & 45 to block access to the rogue websites as identified in the present suit as per the list at page 88 as by the continuous infringement of the copyright of their creative work in the shape of various movies as listed in the plaint including Mulan, Lego Batman, Finding Nemo, Finding Dory, Aquaman, Wonder Woman, San Andreas and Joker and TV Series such as Mob Psycho, Friends, Stranger Things, Sacred Games, Jojo's Bizarre Adventures and Arrow etc., immense loss is being caused to the plaintiffs. It is further submitted that the identities of these rogue websites were veiled and were anonymous and they satisfied the characteristics that have been laid down by this Court for identifying a rogue website in *UTV Software Communication Ltd. v. 1337X.to*, 2019 SCC OnLine Del 8002 which are reproduced herein below for ready reference-
 - "59. In the opinion of this Court, some of the factors to be considered for determining whether the website complained of is a FIOL/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."
- 25. The defendants No.1 to 34 have been created to upload pirated movies, TV programmes etc. These websites are anonymous in nature. The information provided in the public domain regarding the owners of the websites is inherently incorrect or protected behind the veil of secrecy and hidden behind private domain services offered by various domain name Registrars. Therefore, there is force in the contention of the learned counsel for the plaintiffs that it is virtually impossible to bring the owners of these websites before the court and to ensure that the orders are complied with. Yet there is no gainsaying that these websites are actively streaming motion pictures and television content of the plaintiffs through illegal means. The

CS(COMM) 116/2022 Page 9 of 17

legal notices issued to them have evoked no response. Such illegal websites made with the primary and sole objective to pirate copyrighted works for their own commercial benefits cannot be permitted to continue doing so, to await the disposal of the suit. Therefore, the defendants No.35 to 43 are directed to block access to these websites as mentioned below:

LIST OF WEBSITES

S. No.	Domain Name	URL	IP Address
	Defendant No. 1	I	
1.	123movieshub.tc	https://ww5.123movieshub.tc	172.64.206.23
			172.64.207.23
2.	123moviesfree4u.com	https://www4.123moviesfree4u.co	172.67.166.56
		m	104.21.82.249
3.	0123movie.ru	https://0123movie.ru	162.159.137.85
			162.159.138.85
4.	123movieshindi.net	https://123movieshindi.net	104.21.48.56
			172.67.178.208
5.	123movieshindi.com	http://123movieshindi.com	172.67.168.166
			104.21.94.199
6.	1-23movies.cc	https://w1.1-23movies.cc	104.21.13.82
			172.67.198.212
7.	123tv.movie	https://123tv.movie	172.67.214.2
			104.21.93.188
8.	123moviesh.to	https://123moviesh.to	104.21.70.96
			172.67.222.123
9.	123movie.sh	https://ww33.123movie.sh	172.67.154.37

			104.21.4.147
10.	w-123movies.club	http://w-123movies.club	104.21.69.100
			172.67.207.102
	Defendant No. 2		
11.	putlocker-website.com	http://putlocker-website.com	162.159.137.85
			162.159.138.85
12.	putlockernew.site	https://ww2.putlockernew.sit e	104.31.16.8
			104.31.16.121
13.	putlocker.ps	https://putlocker.ps	162.159.137.85
			162.159.138.85
14.	putlockers.llc	https://putlockers.llc	104.21.90.142
			172.67.157.191
15.	putlocker.gg	https://putlocker.gg	172.67.189.149
			104.21.89.155
	Defendant No. 3		(
16.	0gomovies.ws	https://0gomovies.ws	172.67.210.93
			104.21.69.164
17.	poppygreens.com	https://poppygreens.com	172.67.167.169
			104.21.42.228
	Defendant No. 4		
18.	1movieshd.com	https://1movieshd.com	104.21.54.127
			172.67.138.179
	Defendant No. 5		

19.	2gomovies.ws	https://2gomovies.ws	194.145.208.168
	Defendant No. 6		
20.	2kmovie.cc	https://2kmovie.cc	162.159.137.85
			162.159.138.85
	Defendant No. 7		
21.	4filmyzilla.bar	https://ww2.4filmyzilla.bar	104.21.49.197
			172.67.166.204
	Defendant No. 8		
22.	bolly2tolly.eu	https://www.bolly2tolly.eu	172.67.223.114
			104.21.91.151
23.	oyomovies.com	http://oyomovies.com	104.21.21.10
			172.67.195.168
24.	bolly2tolly.net	https://www.bolly2tolly.net	104.21.29.70
			172.67.148.145
	Defendant No. 9		
25.	fboxtv.com	https://fboxtv.com	162.159.137.85
			162.159.138.85
	Defendant No. 10		
26.	filmyhit.pink	https://filmyhit.pink	104.21.51.33

			172.67.220.10
27.	filmyhit.media	https://filmyhit.media	104.21.63.32
			172.67.142.173
28.	filmy.link	http://filmy.link	172.67.214.20
			104.21.42.249
	Defendant No. 11		
29.	flixhq.tv	https://flixhq.tv	172.67.164.103
			104.21.50.169
	Defendant No. 12		
30.	fmovies.style	https://fmovies.style	172.67.193.95
			104.21.76.110
	Defendant No. 13		
31.	freemoviesfull.com	https://www1.freemoviesfull.com	162.159.137.85
			162.159.138.
	Defendant No. 14		
32.	gomoviefree.sc	https://gomoviefree.sc	172.67.178.94
			104.21.91.192
	Defendant No. 15		
33.	goojara.to	https://www.goojara.to	172.67.143.39
			104.21.46.235

CS(COMM) 116/2022

	Defendant No. 16		
34.	hdtoday.tv	https://hdtoday.tv	172.67.151.107
			104.21.88.167
	Defendant No. 17		
35.	jexmovie.com	https://jexmovie.com	172.67.191.63
			104.21.33.184
	Defendant No. 18		
36.	kdramahood.com	https://kdramahood.com	162.159.137.85
			162.159.138.85
	Defendant No. 19		
37.	moviecrumbs.net	https://www.moviecrumbs.n et	104.21.23.223
			172.67.213.248
	Defendant No. 20		
38.	moviesyify.online	https://moviesyify.online	104.21.41.62
			172.67.189.122
	Defendant No. 21		
39.	openloadflix.com	http://openloadflix.com	172.67.154.80
			104.21.64.186
	Defendant No. 22		
40.	openloadmov.net	https://openloadmov.net	104.21.72.7

CS(COMM) 116/2022 Page 14 of 17

			172.67.218.89
			104.21.24.111
	Defendant No. 23		
41.	pagalmovies.digital	https://www.pagalmovies.digital	172.67.190.54
			104.21.10.138
42.	pagalmovies.today	https://www.pagalmovies.to day	172.67.196.29
			104.21.76.144
43.	pagalmovies.art	http://pagalmovies.art	104.21.37.94
			172.67.206.218
	Defendant No. 24		
44.	playdesi.net	https://playdesi.net	104.21.96.100
			172.67.176.147
45.	playdesi.tv	https://playdesi.tv	104.21.28.9
			172.67.170.34
	Defendant No. 25		
46.	seriestv.watch	https://seriestv.watch	162.159.137.85
			162.159.138.85
	Defendant No. 26		
47.	spacemov.site	https://spacemov.site	104.21.10.30
			172.67.189.223
48.	spacemov.ws	http://spacemov.ws	104.31.16.6

CS(COMM) 116/2022 Page 15 of 17

		104.31.16.123
Defendant No. 27		
tvshows88.com	https://tvshows88.com	162.159.137.85
		162.159.138.85
Defendant No. 28		
watchfilm.net	https://ww11.watchfilm.net	162.159.137.85
		162.159.138.85
Defendant No. 29		
watchmovieshd.ru	https://watchmovieshd.ru	162.159.137.85
		162.159.138.85
Defendant No. 30		
watchseries.ma	https://watchseries.ma	104.21.5.100
		172.67.154.116
Defendant No. 31		
watchserieshd.stream	https://watchserieshd.stream	172.67.162.131
		104.21.42.144
Defendant No. 32		
Watchseriesstream	https://watchseriesstream.com	104.21.65.175
.com		104.21.64.186
Defendant No. 33		
	tvshows88.com Defendant No. 28 watchfilm.net Defendant No. 29 watchmovieshd.ru Defendant No. 30 watchseries.ma Defendant No. 31 watchserieshd.stream Defendant No. 32 Watchseriesstream .com	tvshows88.com Defendant No. 28 watchfilm.net https://ww11.watchfilm.net Defendant No. 29 watchmovieshd.ru https://watchmovieshd.ru Defendant No. 30 watchseries.ma https://watchseries.ma Defendant No. 31 watchserieshd.stream https://watchserieshd.stream Defendant No. 32 Watchseriesstream .com

CS(COMM) 116/2022 Page 16 of 17

55.	watchtheoffice.cc	https://watchtheoffice.cc	172.67.194.20
			104.21.20.189
	Defendant No. 34		
56.	xemovie.com	https://xemovie.com	172.64.130.9
			172.64.131.9

- 26. They shall do so within 24 hours of the receipt of the order. The defendants No.44 and 45 are directed to issue notifications calling upon the telecom service providers registered under them to disable access into India of the websites of defendants No.1 to 34 within 36 hours of the receipt of the order.
- 27. Provisions of Order XXXIX Rule 3 CPC be complied with.
- 28. List before the Joint Registrar on 10th May, 2022, for completion of service and pleadings.
- 29. The order be uploaded on the website forthwith.

ASHA MENON, J.

FEBRUARY 21, 2022 ck

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

I.A. NO. _____ OF 2022

IN

CS(COMM) NO. 116 OF 2022

AMENDED MEMO OF PARTIES

- (1) Universal City Studios LLC.
 having its office at
 100 Universal City Plaza, Universal City,
 CA 91608, United States of America,
 Email: antipiracy@nbcuni.com
- (2) Warner Bros. Entertainment Inc.
 having its office at
 4000 Warner Boulevard, Burbank,
 California 91522, United States of America
 Email: antipiracy@warnerbros.com
- (3) Columbia Pictures Industries, Inc.
 having its office at
 10202 W. Washington Blvd., Culver City,
 CA 90232-3195 United States of America,
 Email: copyright agent@spe.sony.com
- (4) Netflix Studios, LLChaving its office at100 Winchester Cir Los GatosCA, 95032-1815, United States of America,

Email: legal@netflix.com

(5) Paramount Pictures Corporation
having its office at
5555 Melrose Avenue, Hollywood,
CA, 90038, United States of America,
Email: CopyrightAgent@Paramount.com

(6) Disney Enterprises, Inc.

having its office at

500 S. Buena Vista, Burbank,

CA, 91521, United States of America,

Email: tips@disneyantipiracy.com

... Plaintiffs

Versus

(1) 123movieshub.tc

123moviesfree4u.com

0123movie.ru

123movieshindi.net

123movieshindi.com

1-23movies.cc

123tv.movie

123moviesh.to

123movie.sh

w-123movies.club

Contact information: <u>domreg@101domain.com</u>,

dmca@123moviesfree4u.com,

abuse@namecheap.com,

ee072bc7ce44ea8b09b24d4cd9b1f11.protect@withhe

<u>Idforprivacy.com</u>, <u>123movie.ru@gmail.com</u>,

<u>abuse@instra.com</u>, <u>info@domain-contact.org</u>, <u>abuse@godaddy.com</u>, <u>abuse@porkbun.com</u>

putlocker-website.com
putlocker.ps
putlockers.llc
putlocker.gg
Contact information: abuse@namecheap.com,
ee83f64524ce46039683905f6f8adabc.protect@withh
eldforprivacy.com, info@todaynic.com,
abuse@sarek.fi

(3) 0gomovies.ws

poppygreens.com

Contact Information: info@dynadot.com,
abuse@namecheap.com,
abuse@namecheap.com,
dynadot.com,
abuse@tucows.com,
abuse@tucows.com<

(4) 1movieshd.com

Contact Information: https://lmovieshd.com/contact

(5) 2gomovies.ws

Contact Information: support@directnic.com

(6) 2kmovie.cc

Contact Information: <u>abuse@namecheap.com</u>, <u>eb04b777e3fc4156b1603f6082c3f9ee.protect@withh</u> <u>eldforprivacy.com</u>

(7) 4filmyzilla.bar

Contact Information: <u>abuse@namecheap.com</u>

(8) bolly2tolly.eu

oyomovies.com

bolly2tolly.net

Contact Information: support@porkbun.com,

abuse@name.com

(9) fboxtv.com

Contact Information: <u>abuse@namecheap.com</u>, <u>3b4da2c35f644b6db178d71ed9f444d5.protect@with</u> <u>heldforprivacy.com</u>

(10) filmyhit.pink

filmyhit.media

filmy.link

Contact Information: abuse@name.com

(11) flixhq.tv

Contact Information: <u>abuse@namecheap.com</u>, <u>f7e066fdbb2d4d53923b4a46c9329fa2.protect@withh</u> <u>eldforprivacy.com</u>

(12) fmovies.style

Information: support@fmovies.style, Contact abuse@namecheap.com (13) freemoviesfull.com Contact Information: abuse@namecheap.com, 59f94e8ab1d74899be52871812115f3d.protect@with heldforprivacy.com (14) gomoviefree.sc Contact Information: abuse@instra.com (15) goojara.to Contact Information: https://supernova.to/sn/sitetalk (16) hdtoday.tv Contact Information: https://hdtoday.tv/contact (17) jexmovie.com Contact Information: domainabuse@tucows.com (18) kdramahood.com Contact Information: abuse@godaddy.com (19) moviecrumbs.net Information: Contact abuse@regtons.com, moviecrumbs.net@whoisprotection.domains (20) moviesyify.online Information: Contact

abuse@publicdomainregistry.com

(21) openloadflix.com

Contact Information: <u>abuse@ionos.com</u>, <u>dataprivacyprotected@ionos.de</u>

(22) openloadmov.net

Contact Information: domainabuse@tucows.com

(23) pagalmovies.digital

pagalmovies.today

pagalmovies.art

Contact Information: pagalmovies123@gmail.com,

abuse@namecheap.com

(24) playdesi.net

playdesi.tv

Contact Information: abuse@name.com

(25) seriestv.watch

Contact Information: abuse@namecheap.com

(26) spacemov.site

spacemov.ws

Contact Information: abuse@namesilo.com

(27) tvshows88.com

Contact Information: <u>tvshows88@gmail.com</u>, <u>tld-</u>

abuse@nic.ru, darksolar.team@gmail.com

(28) watchfilm.net

Contact Information: abuse@porkbun.com

(29) watchmovieshd.ru

Contact Information: watchmovieshd@gmail.com

(30) watchseries.ma

Contact Information: whois@njal.la, h.aboulfeth@genious.net

(31) watchserieshd.stream

Contact Information:

watchserieshdstream@gmail.com,

abuse@namecheap.com

(32) watchseriesstream.com

Contact Information: <u>abuse@namecheap.com</u>, <u>70c8fe8878af44ed9aaae5ae30f6ce21.protect@withheldforprivacy.com</u>

(33) watchtheoffice.cc

Contact Information: <u>abuse@namecheap.com</u>, <u>85d1fa6d1e804e76864d9c5a8c65b449.protect@with heldforprivacy.com</u>

(34) xemovie.com

Contact Information: <u>abuse@namecheap.com</u>, <u>00c697b90a0145f6ad24c5424d9af234.protect@withh</u> <u>eldforprivacy.com</u>

(35) Atria Convergence Technologies Pvt. Ltd.

99A/113A, Manorayana Palya

R.T. Nagar Bangalore -560032

Also At:

2nd and 3rd Floor, No. 1, Indian Express Building, Queen's Road, Bangalore 560001 Karnataka nodal.term@actcorp.in; Jitesh.chathambil@actcorp.in

(36) Bharat Sanchar Nigam Ltd.

Bharat Sanchar Bhawan, Regulation Cell

5th floor, Harish Chandra Mathur Lane

Janpath, New Delhi -110001

ddg_reg@bsnl.co.in; sbkhare@bsnl.co.in

averma@bsnl.co.in; sushmamishra71@gmail.com

(37) Bharti Airtel Ltd.

Airtel Centre, Tower-A, 6th floor

'A'Wing, Plot No.16, Udyog Vihar

Ph - IV, Gurgaon – 122016

121@in.airtel.com; compliance.officer@bharti.in;

jyoti.pawar@in.airtel.com; Ravi.gandhi@airtel.com;
amit.bhatia@airtel.com

(38) Hathway Cable & Datacom Pvt. Ltd.
'Rahejas',4 floor, Main Avenue
Santacruz (W), Mumbai-400054
ajay.singh@hathway.net;
Sudhir.shetye@hathway.net

(39) Mahanagar Telephone Nigam Ltd.

5th Floor, Mahanagar Doorsanchar Sadan

9, CGO Complex, Lodhi Road

New Delhi – 110003

raco.mtnl@gmail.com; mtnlcsco@gmail.com

gmracomtnl@gmail.com

(40) Reliance Jio Infocomm Limited
RCP 14 (TC 23), Phase 4,
B-Block, 3rd Floor,
C 4 130 Twane- belapur Road,
Gansoli,
Navi Mumbai- 400701
care@jio.com; Hitesh.marthak@relianceada.com;
Kapoor.guliani@ril.com; mahipal.singh@ril.com;
sunil.kr.gupta@ril.com; shilpi.kant@ril.com;
jyoti.jain@ril.com

(41) Shyam Spectra Pvt. Ltd.Plot No. 258,Okhla Industrial Estate, Phase III,New Delhi – 110020

Also at:

Plot No. 21-22, 3rd Floor Udyog Vihar, Phase IV, Gurugram -122015 info@spectra.co; compliance@spectra.co

(42) Tata Teleservices Ltd.

A, E & F Blocks

Voltas Premises - T. B. Kadam Marg

Chinchpokli, Mumbai – 400033

pravin.jogani@tatatel.co.in;

anand.dalal@tatatel.co.in; satya.yadav@tatatel.co.in

(43) Vodafone India Limited

Vodafone House,

Peninsula Corporate Park,

Ganpatrao Kadam Marg,

Lower Parel, Mumbai - 400 013 India

Also At:

Birla Centurion,

10th Floor, Plot no.794,

B Wing, Pandurang Budhkar Marg,

Worli, Mumbai - 400 030 India

smitha.menon@vodafoneidea.com;

pankaj.kapdeo@vodafoneidea.com

Radhika.gokhale@vodafoneidea.com;

sheena.thukral@vodafoneidea.com

(44) Department of Telecommunications

Through Secretary,

Ministry of Communications and IT,

20, Sanchar Bhawan, Ashoka Road,

New Delhi – 110001

secy-dot@nic.in, dirds2-dot@nic.in, adetds2-

dot@gov.in

(45) Ministry of Electronics and Information Technology
Through the Director General (DIT) Cyber Laws &
e-security),
Electronics Niketan, 6, CGO Complex,
Lodi Road, New Delhi – 110003
cyberlaw-legal@meity.gov.in

- (46) Ashok Kumars
- (47) hdtoday.cc

Contact information: abuse@sarek.fi

...Defendants

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

CS Comm 116 of 2022

SCHEDULE A

Injuncted	URL of New	Domain	IP Addresses
Website	Mirror/Redire	Name of	of New
Location (at the	ct/	Mirror/Redire	Mirror/Redire
time of suit as	Alphanumeric	ct/	ct/Alphanume
well as	Variation of	Alphanumeric	ric Variation
additionally	Injuncted	Variation of	of Injuncted
impleaded	Website	Injuncted	Website
websites)		Website	
123movieshub.t	https://hdtoda	hdtoday.cc	104.21.50.63,
c;	y.cc		172.67.157.14
123moviesfree4			0
u.com;			
0123movie.ru;			
123movieshindi			
.net;			
123movieshindi			
.com; 1-			
23movies.cc;			
123tv.movie;			
123moviesh.to;			
123movie.sh;			
W-			
123movies.club			
putlocker-			
website.com;			
putlockermew.s			
ite;			
putlocker.ps;			

putlockers.llc;		
putlocker.gg		
0gomvoies.ws;		
poppygreens.co		
m		
1movieshd.com		
2gomovies.ws		
2kmovie.cc		
4filmysilla.bar		
bolly2tolly.eu;		
oyomovies.com		
; bolly2tolly.net		
fboxtv.com		
filmyhit.pink;		
filmyhit.media;		
filmy.link		
flixhq.tv		
fmovies.style		
freemoviesfull.c		
om		
gomoviefree.sc		
goojara.to		
hdtoday.tv		
jexmovie.com		
kdramahood.co		
m		
moviecrumbs.n		
et		
moviesyify.onli		
ne		
	<u>l</u>	

openloadflix.co		
m		
openloadmov.n		
et		
pagalmovies.di		
gital;		
pagalmovies.to		
day;		
pagalmovies.art		
playdesi.net,		
playdesi.tv		
seriestv.watch		
spacemov.site;		
spacemov.ws		
tvshows88.com		
watchfilm.net		
watchmovieshd.		
ru		
watchseries.ma		
watchserieshd.s		
tream		
watchseriesstrea		
m.com		
watchtheoffice.		
cc		
xemovie.com		
	<u> </u>	<u> </u>

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

I.A. NO. _____ OF 2022

IN

CS(COMM) NO. 116 OF 2022

IN THE MATTER OF

Universal City Studios LLC and Ors.

...Plaintiffs

Versus

123movieshub.tc & 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.

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.

I identified the deponent who has signed in my presence.

Period 27/06/2019

to 27/06/2024

DEPONENT

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

delbi on therefrom

That the contents of the affidavit witch have been read & explained to him/her are true & correct to his aer knowledge

3 0 NOV 2022

DEPONENT