

BY EMAIL/DOT WEBSITE

**Government of India
Ministry of Communications
Department of Telecommunications
Sanchar Bhawan, 20, Ashoka Road, New Delhi - 110001
(Data Services Cell)**

No. 813-07/LM-37/2019-DS-II**Dated: 29-12-2022****To**

All Internet Service Licensee's

Subject: C.S.(COMM) No. 457 of 2019; Warner Bros. Entertainment Inc. vs. Moviesflix.net & Ors., before Hon'ble Delhi High Court

In continuation to Department of Telecommunications even no. letters dated 16.09.2019, 13.01.2020, 09.10.2020, 18.01.2021, 02.08.2021, 09.11.2021, 23.02.2022 & 22.03.2022; kindly find the enclosed Hon'ble Delhi High court orders dated 15th December 2022 & 10th October 2022 with respect to newly impleaded **Defendant no. 225 to 231** in the subject matter case C.S. (Comm) No. 457 of 2019 for compliance.

2. Hon'ble Court in order dated 15th December 2022 has, inter alia, stated that:

I.A. 21401/2022 filed by plaintiff Under Order 1 Rule 10 CPC seeking impleadment of additional mirrors, redirects or alpha numeric variations as defendants 225-231 in the memo of parties.

.....In view of the submissions of Ld. Counsel for the applicant and the directions passed in para no. 29 of the said judgment, the websites mentioned in the prayer clause of the application especially Schedule-A are impleaded as defendant no. 225-231 .

*Since the newly added defendants are also stated to be involved in violation of copyrights of plaintiff, accordingly the decree of permanent injunction dated 10.10.2022 is also extended against newly added defendant no. 225-231. The **DoT, ISP and MEITY** are directed to do the needful in terms of the abovesaid decree of permanent injunction dated 10.10.2022.*

3. In view of the above, all the Internet Service licensees are requested to take immediate necessary blocking action for compliance of the Hon'ble court order dated 15th December 2022 read with order dated 10th October 2022 in respect of websites of **Defendant no. 225 to 231** as mentioned in memo of parties/Schedule-A column -2 (copy enclosed).

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 (Respondent no. 25) 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) 457/2019
WARNER BROS. ENTERTAINMENT INC.

..... Plaintiff

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

versus

MOVIESFLIX.NET_& ORS.

..... Defendant

Through: Mr.Azhar Qayum Khan,
Advocate (VC) for Tata
Teleservices Ltd.
Mr.Bhagvan Swarup
Shukla (CGSC) with
Mr.,Vikrant, Advocate for
UOI.

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

ORDER

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15.12.2022

**I.A. 21401/2022 filed by plaintiff Under Order 1 Rule 10 CPC
seeking impleadment of additional mirrors, redirects or
alpha numeric variations as defendants 225-231 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 26.08.2019 and decree of permanent injunction vide order dated 10.10.2022 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 26.08.2019 and 10.10.2022 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. 225-231. It is further argued that even decree of permanent injunction dated 10.10.2022 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. 29 of the said judgment, the websites mentioned in the prayer clause of the application especially Schedule-A are impleaded as defendant no. 225-231.

Since the newly added defendants are also stated to be involved in violation of copyrights of plaintiff, accordingly the decree of permanent injunction dated 10.10.2022 is also extended

against newly added defendant no. 225-231. The DoT, ISP and MEITY are directed to do the needful in terms of the abovesaid decree of permanent injunction dated 10.10.2022.

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: 19.09.2022

Date of decision: 10.10.2022

+ **CS(COMM) 457/2019 & I.A. 11595/2019, 11597/2019, 17180/2021, 17181/2021 & 13799/2022**

WARNER BROS. ENTERTAINMENT INC. Plaintiff
Through: Ms.Suhasini Raina, Ms.R.Ramya,
Ms.Mehr Sidhu, Advs.

versus

MOVIESFLIX.NET_& ORS. Defendants
Through: Mr.Bhagvan Swarup Shukla,
CGSC with Mr.Kamaldeep, Adv.
for UOI.
Mr.Kirtiman Singh, CGSC with
Ms.Vidhi Jain, Advs. for D-26 &
D-27.

**CORAM:
HON'BLE MR. JUSTICE NAVIN CHAWLA**

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

“54. 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 Nos. 1-14 (and such other mirror/redirect/alphanumeric websites discovered to provide additional



means of accessing the Defendant Websites, 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. 15-23, 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 Nos. 1-14 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 Websites, 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. 24 and 25, to issue a



notification calling upon the various internet and telecom service providers registered under it to block access to the Defendant Nos. 1-14 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 Plaint 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 that 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, transmission and streaming of the plaintiff's original content by the Defendant Nos. 1-14, 27-78, 79-118, 119-130, 131-157, 158-174, 175-212, 213-224 (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. 15-23 and concerned departments of the Government of India as the defendant Nos. 24 and 25. 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, 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 streaming or hosting 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 dated 10.04.2019 passed by this Court in a batch of suits, including *UTV Software Communication Ltd. &Ors. v. 1337X.to &Ors.*, 2019 SCC OnLine Del 8002, which dealt with the determination of rogue websites.

10. The plaintiff has filed I.A. 13799 of 2022 under Order XIII-A of the Code of Civil Procedure, 1908 (in short, 'CPC'), as applicable to commercial disputes, seeking a Summary Judgment.

11. The grounds for filing the above 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. 15, 20, 22, 24 and 25 have entered appearance before this Court.

b. That the defendant Nos. 1-14 and 27-224 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 rogue websites impleaded as defendant Nos. 1-14 and 27-224 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 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. 1-14 and 27-224 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 affidavits filed by Mr. Manish Vaishampayan, who conducted the investigation with regard to the aforesaid websites at 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 No.
1.	Print of Contact Details of various websites as available on WHOIS (primary domains):	
	1)MoviesFlixHub.com (Defendant 1)	Pg. 812-814 Folder IV
	2)MoviesFlixHub.net (Defendant No.1)	Pg.913-915 Folder IV
	3)HdMoviearea.com (Defendant No.1)	Pg. 981-983 Folder IV
	4)Dailydrivelink.me (Defendant No.1)	Pg.1097-1099 Folder IV
	5)DailyDriveLink.in (Defendant No.1)	Pg.1102-1105 Folder IV
	6)Psarips.org (Defendant No.2)	Pg.1368-1371 Folder IV
	7)PsaRips.org (Defendant No.2)	Pg.1372-1374 Folder IV
	8)PsaRips.com (Defendant No.2)	Pg.1375-1377 Folder IV
	9)PsaRips.in (Defendant No.2)	Pg.1382-1386 Folder IV
	10)PsaRips.net (Defendant No.2)	Pg.1389-1391 Folder IV



11)World4uFree.store (Defendant No.3)	Pg.1433-1435 Folder IV
12)World4uFree.best (Defendant No.3)	Pg.1436-1438 Folder IV
13)World4uFree.com.co (Defendant No.3)	Pg.1441-1444 Folder IV
14)World4uFree.cool (Defendant No.3)	Pg.1447-1450 Folder IV
15)World4uFree.fun (Defendant No.3)	Pg.1453-1455 Folder IV
16)Moviebaba.in (Defendant No.4)	Pg.1496-1500 Folder IV
17)123movies.domains (Defendant No.5)	Pg.1602-1605 Folder IV
18)123moviesback.org (Defendant No.5)	Pg.1632-1635 Folder IV
19)123MoviesBack.org (Defendant No.5)	Pg.1636-1638 Folder IV
20)123MoviesBack.com (Defendant No.5)	Pg.1639-1641 Folder IV
21)123Movies.gdn (Defendant No.5)	Pg.1679-1682 Folder IV
22)123MoviesLa.com (Defendant No.5)	Pg.1704-1707



		Folder IV
23)123moviesz.pro (Defendant No.5)	Pg.1745-1746	Folder IV
24)123movies.site (Defendant No.5)	Pg.1771-1773	Folder IV
25)123Movies2019.com (Defendant No.5)	Pg.1774-1776	Folder IV
26)123Movies2019.com (Defendant No.5)	Pg.1777-1779	Folder IV
27)123moviesHq.org (Defendant No.5)	Pg.1810-1812	Folder IV
28)123movies.st (Defendant No.5)	Pg.1861-1863	Folder IV
29)123movies.la (Defendant No.5)	Pg.1900-1903	Folder IV
30)123movie.uk (Defendant No.5)	Pg.1977-1979	Folder IV
31)Go123Movies.io (Defendant No.5)	Pg.2193-2195	Folder IV
32)GoStream.site (Defendant No.5)	Pg.2251-2254	Folder IV
33)Gostream.nu (Defendant No.5)	Pg.2275-2277	Folder IV



34)MkVciNemas.eu (Defendant No.6)	Pg.2374-2376 Folder IV
35)MkVciNemas.pro (Defendant No.6)	Pg.2377-2378 Folder IV
36)MkVciNemas.live (Defendant No.6)	Pg.2381-2383 Folder IV
37)MkVciNemas.pro (Defendant No.6)	Pg.2386-2388 Folder IV
38)MkVciNemas.com (Defendant No.6)	Pg.2391-2394 Folder IV
39)MkVciNemas.cz (Defendant No.6)	Pg.2397-2399 Folder IV
40)MkvCage.fun (Defendant No.6)	Pg.2433-2435 Folder IV
41)MkvCage.com (Defendant No.6)	Pg.2476-2480 Folder IV
42)MkvHub.com (Defendant No.6)	Pg.2517-252 Folder IV
43)MkvRips.com (Defendant No.6)	Pg.2571-2573 Folder IV
44)480Mkv.net (Defendant No.6)	Pg.2651-2653 Folder IV
45)480Mkv.com (Defendant No.6)	Pg.2690-2692



	Folder IV
46)MkvCinemas.be (Defendant No.6)	Pg.2775-2776 Folder IV
47)Pahe.in (Defendant No.7)	Pg.2804-2808 Folder IV
48)Ettv.to (Defendant No.8)	Pg.2845-2846 Folder IV
49)Katr.co (Defendant No.8)	Pg.2862-2866 Folder IV
50)KickAss1.to (Defendant No.8)	Pg.2926-2927 Folder IV
51)Kat.ag (Defendant No.8)	Pg.2928-2930 Folder IV
52)KickAss.sx (Defendant No.8)	Pg.2953-2955 Folder IV
53)Kickass.to (Defendant No.8)	Pg.2991-2994 Folder IV
54)Kat.sx (Defendant No.8)	Pg.3014-3017 Folder IV
55)Fullmaza.ch (Defendant No.9)	Pg.3059-3060 Folder IV
56)Fullmaza.vip (Defendant No.9)	Pg.3061-3064 Folder IV



57)FullMaza.Org (Defendant No.9)	Pg.3067-3070 Folder IV
58)Watch-Series.cc (Defendant No.10)	Pg.3139-3142 Folder IV
59)WatchSeriesNet.net (Defendant No.10)	Pg.3155-3157 Folder IV
60)MyWatchseries.stream (Defendant No.10)	Pg.3185-3189 Folder IV
61)MyWatchSeries.stream (Defendant No.10)	Pg.3190-3194 Folder IV
62)MyWatchSeries.stream (Defendant No.10)	Pg.3197-3201 Folder IV
63)Swatchseries.to (Defendant No.10)	Pg.3292-3293 Folder IV
64)dWatchSeries.to (Defendant No.10)	Pg.3294-3296 Folder IV
65)GoWatchSeries.tv (Defendant No.10)	Pg.3352-3354 Folder IV
66)GoWatchSeries.co (Defendant No.10)	Pg.3355-3357 Folder IV
67)WatchSeries.to (Defendant No.10)	Pg.3427-3428 Folder IV
68)Watch-Series.ac (Defendant No.10)	Pg.3429-3431



		Folder IV
69)HdPopcorns.me (Defendant No.11)	Pg.3537-3539	Folder IV
70)HdPopcorns.online (Defendant No.11)	Pg.3621-3623	Folder IV
71)LordHd.com (Defendant No.12)	Pg.3651-3654	Folder IV
72)MovieSak47.pro (Defendant No.13)	Pg.3711-3713	Folder IV
73)MovieSak47.in (Defendant No.13)	Pg.3714-3716	Folder IV
74)Subzmovies.nz (Defendant No.14)	Pg.3740-3743	Folder IV
75)123movies.actor (Defendant No. 27)	I.A. No. 17639/2019 Pg 378-380(Vol. III)	
76)123movies.best (Defendant No. 28)	I.A. No. 17639/2019 Pg 381-384 (Vol. III)	
77)123Movies.cat (Defendant No. 29)	I.A. No. 17639/2019 Pg 385-388(Vol. III)	
78)123Movies01.to (Defendant No. 30)	I.A. No. 17639/2019 Pg 389-390(Vol. III)	
79)123Movies009.com (Defendant No.31)	I.A. No. 17639/2019 Pg.391-393(Vol. III)	



80)123Moviesfull.me (Defendant No. 32)	I.A. No. 17639/2019 Pg 394-396 (Vol. III)
81)123MovieSs.cc (Defendant No.33)	I.A. No. 17639/2019 Pg 397-400(Vol. III)
82)Go123Movies.to (Defendant No. 34)	I.A. No. 17639/2019 Pg 401-402 (Vol. III)
83)PortalenEws.me (Defendant No.35)	I.A. No. 17639/2019 Pg. 403-405(Vol. III)
84)Video123Movies.com (Defendant No. 36)	I.A. No. 17639/2019 Pg 406-408 (Vol. III)
85)480PtVsEries.info (Defendant No. 37)	I.A. No. 17639/2019 Pg 465-467 (Vol. III)
86)World4uFree.surf (Defendant No.38)	I.A. No. 17639/2019 Pg 520-523 (Vol. III)
87)World4ufree.casa (Defendant No. 39)	I.A. No. 17639/2019 Pg 524-528(Vol. III)
88)World4ufree.com (Defendant No. 40)	I.A. No. 17639/2019 Pg 529-533 (Vol. III)
89)World4ufree.host (Defendant No. 41)	I.A. No. 17639/2019 Pg 534-536 (Vol. III)
90)World4ufree.press (Defendant No. 42)	I.A. No. 17639/2019 Pg 537-539 (Vol. III)
91)Fullmaza.site (Defendant No. 43)	I.A. No. 17639/2019



		Pg 573-576(Vol. III)
92)Fullmaza.de (Defendant No. 44)	I.A. No. 17639/2019 Pg 577-578(Vol. III)	
93)Altdownload.com (Defendant No.45)	I.A. No. 17639/2019 Pg 684-688 (Vol. IV)	
94)Gowatchseries.fm (Defendant No. 46)	I.A. No. 17639/2019 Pg 689-692 (Vol. IV)	
95)Gowatchseries.me (Defendant No. 47)	I.A. No. 17639/2019 Pg.693-695 (Vol. IV)	
96)Gowatchseries.video (Defendant No. 48)	(I.A. No. 17639/2019 Pg 696 – 698 (Vol. IV)	
97)Hdpopcorns.ws (Defendant No. 49)	I.A. No. 17639/2019 Pg 850-851 (Vol. V)	
98)Hdpopcorns.eu (Defendant No. 50)	I.A. No. 17639/2019 Pg 852-854 (Vol. V)	
99)Hdpopcorns.blue (Defendant No. 51)	I.A. No. 17639/2019 Pg 855-857 (Vol. V)	
100)Hdpopcorns.club (Defendant No. 52)	I.A. No. 17639/2019 Pg 858-861(Vol. V)	
101)Hdpopcorns.cc (Defendant No. 53)	I.A. No. 17639/2019 Pg 862-864 (Vol. V)	
102)Isubsmovies.com (Defendant No. 54)	I.A. No. 17639/2019 Pg 923-925 (Vol. V)	



103)Kickass-kat.com (Defendant No. 55)	I.A. No. 17639/2019 Pg 944-946 (Vol. V)
104)Kkat.net (Defendant No. 56)	I.A. No. 17639/2019 Pg 947-950 (Vol. V)
105)Thekat.cc (Defendant No.57)	I.A. No. 17639/2019 Pg 951-953 (Vol. V)
106)Moviezflix.net (Defendant No. 58)	I.A. No. 17639/2019 Pg.994-995 (Vol. V)
107)Moviesflix.epizy.com (Defendant No.59)	I.A. No. 17639/2019 Pg.996-1000 (Vol. V)
108)Moviezflix.in (Defendant No. 60)	I.A. No. 17639/2019 Pg 1001-1004 (Vol. V)
109)Moviezflix.cc (Defendant No.61)	I.A. No. 17639/2019 Pg 1005-1008 (Vol. V)
110)Movieshunk.net (Defendant No.62)	I.A. No. 17639/2019 Pg 1039-1041 (Vol. V)
111)My480mkv.org (Defendant No. 63)	I.A. No. 17639/2019 Pg 1117- 1119 (Vol. V)
112)My480mkv.org (Defendant No. 64)	I.A. No. 17639/2019 Pg.1120-1122 (Vol. V)
113)480mkv.net (Defendant No. 65)	I.A. No. 17639/2019 Pg 1123-1125 (Vol. V)
114)Psarips.eu (Defendant No. 66)	I.A. No. 17639/2019



		Pg 1141-1142 (Vol. VI)
115)Unblockninja.icu (Defendant No.67)		I.A. No. 17639/2019 Pg 1229 - 1231 (Vol. VI)
116)Mkvcinemas.win (Defendant No. 68)		I.A. No. 17639/2019 Pg 1232-1236 (Vol. VI)
117)Mkvc.org (Defendant No. 69)		I.A. No. 17639/2019 Pg 1237-1239 (Vol. VI)
118)Lordhd.net (Defendant No. 70)		I.A. No. 17639/2019 Pg 1266-1268 (Vol. VII)
119)Watchseries.si (Defendant No. 71)		I.A. No. 17639/2019 Pg 1395-1398 (Vol. VII)
120)Watchseries.movie (Defendant No. 72)		I.A. No. 17639/2019 Pg 1399-1401 (Vol. VII)
121)Watchseries.fyi (Defendant No. 73)		I.A. No. 17639/2019 Pg 1402-1405(Vol. VII)
122)Watchseries.cx (Defendant No. 74)		I.A. No. 17639/2019 Pg 1406-1408 (Vol. VII)
123)Watchseries.ws (Defendant No. 75)		I.A. No. 17639/2019 Pg 1409-1412 (Vol. VII)
124)Watchseries.rocks (Defendant No. 76)		I.A. No. 17639/2019 Pg 1413-1417 (Vol. VII)
125)Watchseries.fi (Defendant No.77)		I.A. No. 17639/2019 Pg 1418-1420 (Vol. VII)



126)CinemaMkv.net (Defendant No. 78)	I.A. No. 17639/2019 Pg1451-1454 (Vol. VIII)
127)KatMovieHd.nu (Defendant No.79)	I.A. No. 8547/2020 Pg. 100-102 (Vol.1)
128)KatMovieHd.mobi (Defendant No.80)	I.A. No. 8547/2020 Pg. 130-132(Vol.1)
129)Kat.rip (Defendant No.81)	I.A. No. 8547/2020 Pg. 138-141(Vol.1)
130)KickAssTorrents.to (Defendant No.82)	I.A. No. 8547/2020 Pg. 194-196(Vol.1)
131)KickAssTorrent.cr (Defendant No.83)	I.A. No. 8547/2020 Pg. 249-252(Vol.2)
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86)Watch-series.cx (Defendant No. 74)	I.A. No. 17639/2019 Pg 1366-1368 (Vol. VII)
87)CinemaMkv.net (Defendant No. 78)	I.A. No. 17639/2019 Pg 1421-1424 (Vol. VII)



88)KatMovieHd.nu (Defendant No.79)	I.A. No. 8547/2020 Pg. 68-73(Vol.1)
89)Katmoviehd.mobi (Defendant No.80)	I.A. No. 8547/2020 Pg. 103-117(Vol.1)
90)Kat.rip (Defendant No.81)	I.A. No. 8547/2020 Pg. 133-134(Vol.1)
91)KatMovieHd.nu (Defendant No.79)	I.A. No. 8547/2020 Pg. 68-73(Vol.1)
92)Katmoviehd.mobi (Defendant No.80)	I.A. No. 8547/2020 Pg. 103-117(Vol.1)
93)Kat.rip (Defendant No.81)	I.A. No. 8547/2020 Pg. 133-134(Vol.1)
94)kickasstorrents.to (Defendant No.82)	I.A. No. 8547/2020 Pg.142-153(Vol.1)
95)Kickasstorrent.cr (Defendant No.83)	I.A. No. 8547/2020 Pg.197-206(Vol.2)
96)Thekat.app (Defendant No.84)	I.A. No. 8547/2020 Pg.253-254(Vol.2)



97)123movie.ag (Defendant No.85)	I.A. No. 8547/2020 Pg. 264-274(Vol.2)
98) online0123movies.com (Defendant No.86)	I.A. No. 8547/2020 Pg. 303- 307(Vol.2)
99)123movies2020.org (Defendant No.87)	I.A. No. 8547/2020 Pg. 344-348(Vol.2)
100)0123movie.net (Defendant No.88)	I.A. No. 8547/2020 Pg. 366-367(Vol.2)
101)0123movies.su (Defendant No.89)	I.A. No. 8547/2020 Pg. 376-379(Vol.2)
102)123moviesfree.sc (Defendant No.90)	I.A. No. 8547/2020 Pg. 389-393(Vol.2)
103)Go123Movies.co (Defendant No.91)	I.A. No. 8547/2020 Pg. 411-412(Vol.3)
104)video123movies.co (Defendant No.92)	I.A. No. 8547/2020 Pg. 420-427(Vol.3)
105)watchseries.cn (Defendant No.93)	I.A. No. 8547/2020 Pg. 550-552(Vol.3)



106)Fullmaza.nl (Defendant No.94)	I.A. No. 8547/2020 Pg. 557-560(Vol.3)
107)Lordhd.in (Defendant No.95)	I.A. No. 8547/2020 Pg. 602-605(Vol.3)
108)Mkvhub.net (Defendant No.99)	I.A. No. 8547/2020 Pg. 636-641(Vol.4)
109)MkvHero.com (Defendant No.100)	I.A. No. 8547/2020 Pg. 659-663(Vol.4)
110)Mkvking.com (Defendant No.102)	I.A. No. 8547/2020 Pg. 684-690(Vol.4)
111)Mlvflix.fun (Defendant No.103)	I.A. No. 8547/2020 Pg. 745-748(Vol.4)
112)Mkvmad.cc (Defendant No.105)	I.A. No. 8547/2020 Pg 786- 790(Vol.4)
113)Mkv4u.co (Defendant No.107)	I.A. No. 8547/2020 Pg. 819-825(Vol.4)
114)Mkvmoviespoint.net (Defendant No.108)	I.A No. 8547/2020 Pg. 839-844(Vol.4)



115)Mkvfullmovies.com (Defendant No.111)	I.A No. 8547/2020 Pg. 865-866(Vol.5)
116)film.mkvmoviesking.com (Defendant No.112)	I.A No. 8547/2020 Pg. 874-877(Vol.5)
117)moviesflix.buzz (Defendant No.113)	I.A No. 8547/2020 Pg. 887-890(Vol.5)
118)moviesflixpro.org (Defendant No.114)	I.A No. 8547/2020 Pg. 909-914(Vol.5)
119)psarips.xyz (Defendant No.115)	I.A No. 8547/2020 Pg. 946-954(Vol.5)
120)Series.movie (Defendant No.117)	I.A No. 8547/2020 Pg. 1025-1033(Vol.5)
121)Kickasstorrents.cr (Defendant No.119)	I.A. 12343/ 2020 Pg. 66-76(Vol.1)
122)Thekickasstorrents.to (Defendant No.120)	I.A. 12343/ 2020 Pg. 114-115(Vol.1)
123)Watchserieshd.tv (Defendant No.121)	I.A. 12343/ 2020 Pg. 120-122(Vol.1)



124)WatchSeriesHd.co (Defendant No.122)	I.A. 12343/ 2020 Pg. 154- 156(Vol.1)
125)Watchseries.video (Defendant No.123)	I.A. 12343/ 2020 Pg. 168-172(Vol.1)
126)123moviesfreego.com (Defendant No.124)	I.A. 12343/ 2020 Pg. 185-188(Vol.1)
127)moviesfree.ws (Defendant No.125)	I.A. 12343/ 2020 Pg. 201-203(Vol.1)
128)Movies123.click (Defendant No.126)	I.A. 12343/ 2020 Pg. 213-219(Vol.2)
129)Psarips.uk (Defendant No.129)	I.A. 12343/ 2020 Pg. 252-260(Vol.2)
130)123moviesfun.is (Defendant No.131)	I.A. No.7068/2021 Pg. 85-95(Vol.1)
131)123-movies.club (Defendant No.132)	I.A. No.7068/2021 Pg. 105-106(Vol.1)
132)123moviesfree.net (Defendant No.133)	I.A. No.7068/2021 Pg. 112-116(Vol.1)



133)123movie.cc (Defendant No.134)	I.A. No.7068/2021 Pg. 121-123(Vol.1)
134)123movies.email (Defendant No.135)	I.A. No.7068/2021 Pg. 132-135(Vol.1)
135)123Movies.Market (Defendant No.136)	I.A. No.7068/2021 Pg. 141-146(Vol.1)
136)123movie.show (Defendant No.137)	I.A. No.7068/2021 Pg. 157-160(Vol.1)
137)123movie.movie (Defendant No.138)	I.A. No.7068/2021 Pg. 186-188(Vol.1)
138)123moviesgo.tv (Defendant No.139)	I.A. No.7068/2021 Pg. 198-201(Vol.1)
139)Real-123movies.best (Defendant No.140)	I.A. No.7068/2021 Pg. 208-213(Vol.1)
140)123moviesca.com (Defendant No.141)	I.A. No.7068/2021 Pg. 217-220(Vol.1)
141)123movies.codes (Defendant No.142)	I.A. No.7068/2021 Pg. 225-227(Vol.1)



142)1-2-3movies.com (Defendant No.145)	I.A. No.7068/2021 Pg. 248-250(Vol.2)
143)123movies.coffee (Defendant No.146)	I.A. No.7068/2021 Pg. 257-259(Vol.2)
144)123Movies.online (Defendant No.150)	I.A. No.7068/2021 Pg. 292-294(Vol.2)
145)123movies-official.site (Defendant No.151)	I.A. No.7068/2021 Pg. 300-303 (Vol.2)
146)Gowatchseries.bz (Defendant No.153)	I.A. No.7068/2021 Pg. 338-343 (Vol.2)
147)Watchseries.co (Defendant No.155)	I.A. No.7068/2021 Pg. 347-349(Vol.2)
148)WatchSeriesFree.co (Defendant No.157)	I.A. No.7068/2021 Pg. 360-364(Vol.3)
149)katmoviehd.sk (Defendant No.158)	I.A. No.12726/2021 Pg.86-89(Vol.1)
150)katmoviehd.sx (Defendant No.159)	I.A. No.12726/2021 Pg.90-93(Vol.1)



151)ettvcentral.com (Defendant No.163)	I.A. No.12726/2021 Pg.149-152(Vol.1)
152)mkvking.net (Defendant No.164)	I.A. No.12726/2021 Pg.170-179(Vol.1)
153)pahe.ph (Defendant No.165)	I.A. No.12726/2021 Pg.215-220(Vol.2)
154)unblockninja.com (Defendant No.166)	I.A. No.12726/2021 Pg.252-255(Vol.2)
155)123movies.vu (Defendant No.167)	I.A. No.12726/2021 Pg.262-268(Vol.2)
156)swatchseries.ru (Defendant No.169)	I.A. No.12726/2021 Pg.280-286(Vol.2)
157)themoviesflix.co.com (Defendant No.170)	I.A. No.12726/2021 Pg.304-311(Vol.2)
158)Mkvcinemas.pl (Defendant No.175)	I.A. 17180 of 2021 Pg 103-107(Vol.1)
159)Hdmoviesflix.com.co (Defendant No.180)	I.A. 17180 of 2021 Pg 206-211(Vol.1)



160)123moviesgo.ws (Defendant No.177)	I.A. 17180 of 2021 Pg 94 (Vol.1)
161)La123movies.com (Defendant No.178)	I.A. 17180 of 2021 Pg 94 (Vol.1)
162)La123movies.com (Defendant No.179)	I.A. 17180 of 2021 Pg 95 (Vol.1)
163)123series9.online (Defendant No.180)	I.A. 17180 of 2021 Pg 95 (Vol.1)
164)123movies.as (Defendant No.181)	I.A. 17180 of 2021 Pg 249 - 252 (Vol.2)
165)123-movies.as (Defendant No.182)	I.A. 17180 of 2021 Pg 102 (Vol.2)
166)123movies-one.com (Defendant No.189)	I.A. 17180 of 2021 Pg 100 (Vol.2)
167)123moviess.sc (Defendant No.188)	I.A. 17180 of 2021 Pg 377-380 (Vol.2)
168)123movies.eu (Defendant No.187)	I.A. 17180 of 2021 Pg 355 – 359(Vol.2)



169)123movies.com (Defendant No.186)	I.A. 17180 of 2021 Pg 342-346(Vol.2)
170)123movie-one.com (Defendant No.189)	I.A. 17180 of 2021 Pg 468 – 470(Vol.3)
171)123moviesday.com (Defendant No.190)	I.A. 17180 of 2021 Pg 507-508 (Vol.3)
172)123movies-officI.A.. site (Defendant No.192)	I.A. 17180 of 2021 Pg 557 – 562(Vol.3)
173)123moviesfree.love (Defendant No.194)	I.A. 17180 of 2021 Pg 586 – 593(Vol.3)
174)123ssgm.cc (Defendant No.195)	I.A. 17180 of 2021 Pg 615-624(Vol.3)
175)123kmmg.click (Defendant No.196)	I.A. 17180 of 2021 Pg 683 – 692(Vol.4)
176)123moviesonline.online (Defendant No.197)	I.A. 17180 of 2021 Pg 753 – 762(Vol.3)
177)123db.xyz (Defendant No.198)	I.A. 17180 of 2021 Pg 820 – 828(Vol.4)



178)123paidvideos.me (Defendant No.199)	I.A. 17180 of 2021 Pg 886 – 894(Vol.5)
179)123moviesclub.cc (Defendant No.200)	I.A. 17180 of 2021 Pg 954 – 960(Vol.5)
180)123series9.online (Defendant No.201)	I.A. 17180 of 2021 Pg 1019 – 1027(Vol.5)
181)La123movies.live (Defendant No.202)	I.A. 17180 of 2021 Pg 1087 – 1089(Vol.5)
182)La123movies.com (Defendant No.203)	I.A. 17180 of 2021 Pg 1098 – 1101(Vol.5)
183)d123movies.to (Defendant No.204)	I.A. 17180 of 2021 Pg 1111 – 1113(Vol.5)
184)Mkvking.me (Defendant No.205)	I.A. 17180 of 2021 Pg 1133 – 1142(Vol.5)
185)Hdmoviearea.live (Defendant No.206)	I.A. 17180 of 2021 Pg 1202 – 1229(Vol.5)
186)Hdmoviearea.club (Defendant No.207)	I.A. 17180 of 2021 Pg 1229 – 1229(Vol.5)



187)123moviesgo.ws (Defendant No.209)	I.A. 17180 of 2021 Pg 1308 – 1312(Vol.5)
188)Mkvking.com (Defendant no. 213)	IA 3659/2022 Pg 102 – 110(Vol.1)
189)Gowatchseries.online (Defendant no. 214)	IA 3659/2022 Pg 151 – 154(Vol.1)
190)123movies.tips (Defendant no. 215)	IA 3659/2022 Pg 182 – 185(Vol.1)
191)123moviesfree.vc (Defendant no. 216)	IA 3659/2022 Pg 193 – 197(Vol.1)
192)Movies123.studio (Defendant no. 218)	IA 3659/2022 Pg 223 – 227(Vol.2)
193)123moviesd.com (Defendant no. 219)	IA 3659/2022 Pg 237 - 240(Vol.2)
194)123moviesgo.club (Defendant no. 220)	IA 3659/2022 Pg 251 – 253(Vol.2)
195)Hdpopcorns.wiki (Defendant no. 221)	IA 3659/2022 Pg 262 – 268(Vol.2)



	196)Watchmovie.cc (Defendant no. 222)	IA 3659/2022 Pg 289-291(Vol.2)
	197)Watchmovie.net (Defendant no. 223)	IA 3659/2022 Pg 318 -320(Vol.2)
	198)Watchseries.pub (Defendant no. 224)	IA 3659/2022 Pg 345 – 350(Vol.2)
4.	Printout of proof of infringement by websites (primary domains):	
	1)MoviesFlixHub.com (Defendant No. 1)	Pg.783-790 Folder IV
	2) MoviesFlixHub.net (Defendant No.1)	Pg.868-885 Folder IV
	3) HdMoviearea.com (Defendant No.1)	Pg.954-959 Folder IV
	4) Dailydrivelink.me (Defendant No.1)	Pg.1039-1049 Folder IV
	5) Psarips.org (Defendant No.2)	Pg.1295-1349 Folder IV



6) World4uFree.store (Defendant No.3)	Pg.1400-1415 Folder IV
7) Moviebaba.in (Defendant No.4)	Pg.1471-1485 Folder IV
8) 123movies (Defendant No.5)	Pg.1504-1570 Folder IV
9) 123moviesback.org (Defendant No.5)	Pg.1609-1620 Folder IV
10) 123movies.gdn (Defendant No.5)	Pg.1646-1655 Folder IV
11) 123MoviesLa.com (Defendant No.5)	Pg.1685-1692 Folder IV
12) 123moviesz.pro (Defendant No.5)	Pg.1711-1715 Folder IV
13)123movies.site (Defendant No.5)	Pg.1749-1760 Folder IV
14) 123moviesHq.org (Defendant No.5)	Pg.1791-1801 Folder IV



15) 123movies.st (Defendant No.5)	Pg.1819-1828 Folder IV
16) 123movies.la (Defendant No.5)	Pg.1871-1892 Folder IV
17) 123movie.uk (Defendant No.5)	Pg.1933-1944 Folder IV
18)Go123Movies.io (Defendant No.5)	Pg.1990-2007 Folder IV
19) Gostream.site (Defendant No.5)	Pg.2202-2208 Folder IV
20) Gostream.site (Defendant No.5)	Pg.2202-2208 Folder IV
21) Gostream.nu (Defendant No.5)	Pg.2265-2270 Folder IV
22) mkcinemas.eu (Defendant No.6)	Pg.2286-2309 Folder IV
23)MkvCage.fun (Defendant No.6)	Pg.2410-2422 Folder IV



24)MkvCage.com (Defendant No.6)	Pg.2456-2465 Folder IV
25) MkvHub.com (Defendant No.6)	Pg.2493-2504 Folder IV
26) MkvRips.com (Defendant No.6)	Pg.2541-2551 Folder IV
27)480Mkv.net (Defendant No.6)	Pg.2598-2615 Folder IV
28) 480Mkv.com (Defendant No.6)	Pg.2672-2689 Folder IV
29) MkvCinemas.be (Defendant No.6)	Pg.2699-2706 Folder IV
30)Pahe.in (Defendant No.7)	Pg.2795-2802 Folder IV
31) Ettv.to (Defendant No.8)	Pg.2828-2839 Folder IV
32) Katcr.co (Defendant No.8)	Pg.2853-2860 Folder IV



33) Kickass1.to (Defendant No.8)	Pg.2880-2889 Folder IV
34) Kickass.sx (Defendant No.8)	Pg.2938-2949 Folder IV
35) Kickass.to (Defendant No.8)	Pg.2970-2981 Folder IV
36) Kat.sx (Defendant No.8)	Pg.3002-3008 Folder IV
37) Fullmaza.ch (Defendant No.9)	Pg.3026-3036 Folder IV
38) Watchseries.fm (Defendant No.10)	Pg.3080-3099 Folder IV
39) WatchSeriesNet.net (Defendant No.10)	Pg.3149-3152 Folder IV
40) MyWatchseries.stream (Defendant No.10)	Pg.3162-3174 Folder IV
41) Swatchseries.to (Defendant No.10)	Pg.3223-3227 Folder IV



	42) GoWatchSeries.tv (Defendant No.10)	Pg.3308-3314 Folder IV
	43) Watchseries.to (Defendant No.10)	Pg.3379-3382 Folder IV
	44)hdPopcorns.me (Defendant No.11)	Pg.3441-3444 Folder IV
	45) Hdpopcorns.online (Defendant No.11)	Pg.3545-3548 Folder IV
	46) Lordhd.com (Defendant No.12)	Pg.3629-3636 Folder IV
	47) Moviesak47.pro (Defendant No.13)	Pg.3665-3671 Folder IV
	48) Subzmovies.nz (Defendant No.14)	Pg.3729-3733 Folder IV
	49)Mkvking.com (Defendant no. 6)	IA 3659/2022 Pg 114 - 116
5.	Printouts of the DMCA, FAQ, etc. pages, evidencing infringing nature of the Defendant Websites:	



1) MoviesFlixHub.com (Defendant No. 1) DMCA	Pg. 772-773 Folder IV
2) MoviesFlixHub.com (Defendant No. 1) Contact us	Pg.774-775 Folder IV
3) MoviesFlixHub.net (Defendant No. 1) DMCA	Pg.827-828 Folder IV
4) MoviesFlixHub.net (Defendant No. 1) Contact us	Pg.829-831 Folder IV
5) HdMoviearea.com (Defendant No.1) DMCA	Pg.926-927 Folder IV
6) HdMoviearea.com (Defendant No.1) Contact Us	Pg.928-930 Folder IV
7) Dailydrivelink.me (Defendant No.1) DMCA	Pg.992-995 Folder IV
8) Dailydrivelink.me (Defendant No.1)	Pg.996-997 Folder IV



Contact Us	
9) Psarips.org (Defendant No.2) Contact Us	Pg.1115-1117 Folder IV
10) Moviebaba.in (Defendant No.4) DMCA	Pg.1462-1463 Folder IV
11) Moviebaba.in (Defendant No.4)	Pg.1464-1465 Folder IV
12) 123movies (Defendant No.5) DMCA	Pg.1502-1503 Folder IV
13) 123moviesz.pro (Defendant No.5) DMCA	Pg.1710 Folder IV
14) 123moviesHq.org (Defendant No.5) Contact Us	Pg.1786-1788 Folder IV
15) 123movies.la (Defendant No.5) DMCA	Pg.1867-1868 Folder IV
16) 123movie.uk (Defendant No.5)	Pg.1911-1914 Folder IV



DMCA	
17) Gostream.nu (Defendant No.5) DMCA	Pg.2260-2262 Folder IV
18) MkvCage.fun (Defendant No.6) DMCA	Pg.2406-2407 Folder IV
19) MkvCage.fun (Defendant No.6)Contact Us	Pg.2408-2409 Folder IV
20) MkvCage.com (Defendant No.6) DMCA	Pg.2440-2441 Folder IV
21) MkvHub.com (Defendant No.6) DMCA	Pg.2485-2487 Folder IV
22) MkvHub.com (Defendant No.6) Contact Us	Pg.2488-2490 Folder IV
23) Mkvrips.com (Defendant No.6) DMCA	Pg.2527-2528 Folder IV
24) MkvRips.com (Defendant No.6)	Pg.2529-2530 Folder IV



Contact Us	
25) Ettv.to (Defendant No.8) DMCA	Pg.2810-2811 Folder IV
26) Katcr.co (Defendant No.8) Contact Us	Pg.2848-2849 Folder IV
27) WatchSeriesNet.net (Defendant No.10) DMCA	Pg.3146 Folder IV
28) WatchSeriesNet.net (Defendant No.10) Contact Us	Pg.3147 Folder IV
29) Swatchseries.to (Defendant No.10) DMCA	Pg.3210-3211 Folder IV
30) Swatchseries.to (Defendant No.10) Contact Us	Pg.3212-3213 Folder IV
31) GoWatchSeries.tv (Defendant No.10) DMCA	Pg.3302-3303 Folder IV
32) GoWatchSeries.tv	Pg.3304-3305



(Defendant No.10) Contact Us	Folder IV
33) Watchseries.to (Defendant No.10) DMCA	Pg.3366-3367 Folder IV
34) Watchseries.to (Defendant No.10) Contact Us	Pg.3368-3369 Folder IV
35) Moviesak47.pro (Defendant No.13) DMCA	Pg.3657-3658 Folder IV
36) Moviesak47.pro (Defendant No.13) Contact Us	Pg.3659-3660 Folder IV
37)KatMovieHd.nu (Defendant No.79) Contact Us	I.A. No. 8547/2020 Pg.74-76(Vol.1)
38)KatMovieHd.nu (Defendant No.79) DMCA	I.A. No. 8547/2020 Pg. 77-79 (Vol.1)
39)katmoviehd.sx (Defendant No.159) DMCA	I.A. No.12726/2021 Pg.94-96(Vol.1)



40)ettvcentral.com (Defendant No.163) DMCA	I.A. No.12726/2021 Pg.153-155(Vol.1)
41)mkvking.net (Defendant No.164) DMCA	I.A. No.12726/2021 Pg.181-183(Vol.1)
42)123movies.eu (Defendant No.187) DMCA	I.A. No. 17180 of 2021 Pg 361 – 362(Vol.2)
43)123movies.eu (Defendant No.187) Contact Us	I.A. No. 17180 of 2021 Pg 359 – 360(Vol.2)
44)123moviesfree.love (Defendant No.194) DMCA	I.A. No. 17180 of 2021 Pg 590 – 591(Vol.3)
45)Mkvking.me (Defendant No.205) DMCA	I.A. No. 17180 of 2021 Pg 1143 – 1145(Vol.5)
46)Hdmoviearea.live (Defendant No.206) Contact Us	I.A. No. 17180 of 2021 Pg 1230 – 1231(Vol.5)
47)Hdmoviearea.live (Defendant No.206)	I.A. No. 17180 of 2021 Pg 1232 – 1234(Vol.5)



	DMCA	
	48)123moviesgo.ws (Defendant No.209) Contact Us	I.A. No. 17180 of 2021 Pg 1313 (Vol.5)
	49)123moviesgo.ws (Defendant No.209) DMCA	I.A. No. 17180 of 2021 Pg 1316 – 1317(Vol.5)
	50)Mkvking.com (Defendant no. 213) DMCA	I.A. No. 3659/2022 Pg 111 – 113 (Vol.1)
	51)Gowatchseries.online (Defendant no. 214) DMCA	I.A. No.3659/2022 Pg 157 – 158 (Vol.1)
	52)Gowatchseries.online (Defendant no. 214) Contact Us	I.A. No. 3659/2022 Pg 155 – 156 (Vol.1)
	53)Watchmovie.net (Defendant no. 223) Contact Us	IA 3659/2022 Pg 323 -324 (Vol.2)

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

15. In *UTV Software (supra)*, this Court, as far as the 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 FIOI/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."*

17. It is notable that the plaintiff, in a similar batch of suits, including ***Warner Bros. Entertainment Inc. v. Otorrents.Com &Ors.***, 2022 SCC OnLine Del 1738, wherein judgement was pronounced on 08.09.2022, had filed an application under Order XIII-A of the CPC, as applicable to commercial disputes, wherein this Court, relying on the judgement in



UTV Software (supra), has passed a Summary Judgment and decreed the suits in favour of the plaintiff.

18. In the present Suit as well, vide order dated 26.08.2019, this Court had granted an *ex-parte ad-interim* injunction against the Defendant Nos. 1-14 (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, restraining them 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.

19. This Court had further directed the defendant Nos. 15 to 23 to block the domain names and its URLs as mentioned in the table below:-

S.No	Domains	URLs	IP Addresses	
1.	moviesflix.net	https://moviesflix.net/	104.27.15 8.101	104.27.15 9.101
	moviesflixhub.net	https://moviesflixhub.net/	104.31.82. 218	104.31.83. 218
	moviesflixhub.com	www.moviesflixhub.com	104.18.34. 197	104.18.35. 197
	hdmoviearea.com	https://hdmoviearea.com/	104.31.66. 64	104.31.67. 64



	dailydrivelink.net	http://dailydrivelink.net	104.27.14 0.106	104.27.14 1.106
	dailydrivelink.in	http://dailydrivelink.in	104.28.6.2 22	104.28.7.2 22
	dailydrivelink.me	https://dailydrivelink.me/	104.24.12 0.188	104.24.12 1.188
2.	psarips.org	https://psarips.org/	93.174.89.4	
	psarips.com	https://psarips.com		
	psarips.in	https://psarips.in		
	psarips.net	https://psarips.net		
3.	world4ufree.best	https://world4ufree.best/	104.27.18 4.87	104.27.18 5.87
	world4ufree.com.co	https://world4ufree.com.co	104.18.32. 222	104.18.33. 222
	world4ufree.store	https://world4ufree.store	192.124.2 49.159	
	world4ufree.fun	https://world4ufree.fun	104.27.14 4.38	104.27.14 5.38
	world4ufree.cool	https://world4ufree.cool	104.28.28. 199	104.28.29. 199
4.	moviebaba.in	http://moviebaba.in/	104.27.18 6.85	104.27.18 7.85
5.	123movies.domains	https://ww1.123movies.domains/	104.31.68. 37	104.31.69. 37
	123movies.la	https://www3.123movies.la/	104.25.10 7.102	104.25.10 8.102
	123moviesback.org	https://www.123moviesback.org/	104.27.16 6.24	104.27.16 7.24



	123moviesback.com	https://www.123moviesback.com	104.31.84.11	104.31.85.11
	123movies.gdn	https://www.123movies.gdn/	104.25.88.28	104.25.89.28
	123moviesla.com	https://www.123moviesla.com	104.24.104.218	104.24.105.218
	123movie.uk	https://w3.123movie.uk/	199.188.201.159	
	gostream.nu	https://gostream.nu	104.31.94.223	104.31.95.223
	123moviesz.pro	https://www.123moviesz.pro/	104.24.124.223	104.24.125.223
	is123movies.site	https://is123movies.site/	104.28.22.9	104.28.23.9
	123movies2019.com	https://www.123movies2019.com	104.27.146.147	104.27.147.147
	gostream.site	https://gostream.site	104.18.60.72	104.18.61.72
	go123movies.io	https://www2.go123movies.io/	104.27.142.213	104.27.143.213
	123movieshq.org	https://123movieshq.org/	104.18.42.58	104.18.43.58
	123movies.st	https://www6.123movies.st/	104.31.114.13	104.31.115.13
6.	mkvcinemas.pro	https://www.mkvcinemas.pro/	104.27.188.121	104.27.189.121
	mkvcinemas.cz	https://www.mkvcinemas.cz	104.28.24.84	104.28.25.84
	mkvcinemas.eu	https://www.mkvcinemas.eu	104.27.18	104.27.18



		mas.eu/	8.153	9.153
	mkvcinemas.pw	https://mkvcinemas.pw	104.28.8.69	104.28.9.69
	mkvcinemas.com	https://mkvcinemas.com	104.31.78.10	104.31.79.10
	mkvcinemas.live	https://mkvcinemas.live/	104.27.148.32	104.27.149.32
	mkvcinemas.be	https://www.mkvcinemas.be/	104.18.58.198	104.18.59.198
	mkvhub.com	https://www.mkvhub.com/	104.31.64.69	104.31.65.69
	mkvcage.com	https://www.mkvcage.com/	104.24.98.153	104.24.99.153
	mkvcage.fun	https://www.mkvcage.fun/	104.27.172.131	104.27.173.131
	480mkv.net	https://480mkv.net/	104.27.172.131	104.24.117.158
	480mkv.com	https://480mkv.com	104.31.80.82	104.31.81.82
	mkvrips.com	https://mkvrips.com/	104.18.62.90	104.18.63.90
7.	pahe.in	https://pahe.in/	104.27.132.141	104.27.133.141
8.	etv.to	https://www.etv.to/	104.25.158.33	104.25.159.33
	katcr.co	https://katcr.co/	192.64.119.34	91.212.150.157



	kickass1.to	https://kickass1.to/	104.31.18.30	104.31.19.30
	kikass.to	https://kikass.to/	104.27.150.245	104.27.151.245
	kat.sx	https://kat.sx/	104.31.16.3	104.31.17.3
	kickass.sx	https://kickass.sx/	104.31.18.30	104.31.19.30
	kat.ag	https://kat.ag	104.31.18.30	104.31.19.30
9.	fullmaza.vip	https://fullmaza.vip/	104.27.176.218	104.27.177.218
	fullmaza.ch	https://fullmaza.ch/	104.27.174.146	104.27.175.146
	fullmaza.org	https://fullmaza.org	104.27.190.251	104.27.191.251
10.	swatchseries.to	https://www1.swatchseries.to/	104.31.18.30	104.31.19.30
	dwatchseries.to	https://dwatchseries.to/	104.31.18.30	104.31.19.30
	watch-series.ac	https://watch-series.ac	104.18.58.170	104.18.59.170
	watch-series.co	https://ww6.watch-series.co/	104.25.206.11	104.25.207.11
	watchseries.fm	https://watchseries.fm/	172.64.104.16	172.64.105.16
	watch-series.live	https://www4.watch-series.live/	104.26.4.194	104.26.5.194
	Watch-series.cc	Watch-series.cc	185.38.15.	



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	Watch-series.ru	Watch-series.ru	104.31.92.31	104.31.93.31
	mywatchseries.stream	https://on.mywatchseries.stream	104.28.28.173	104.28.29.173
	mywatchseries.stream	https://get.mywatchseries.stream/	104.28.28.173	104.28.29.173
	watchseries.to	https://ww1.watchseries.to/	104.31.64.104	104.31.65.104
	watchseriesnet.net	http://www5.watchseriesnet.net	104.31.72.66	104.31.73.66
	mywatchseries.stream	https://mywatchseries.stream	104.28.28.173	104.28.29.173
	gowatchseries.tv	https://www2.gowatchseries.tv/	104.26.6.88	104.26.7.88
	gowatchseries.co	https://ww5.gowatchseries.co	104.26.14.159	104.26.15.159
11.	hdpopcorns.online	https://hdpopcorns.online/	104.24.102.92	104.24.103.92
	hdpopcorns.me	https://www.hdpopcorns.me	104.24.106.249	104.24.107.249
12.	lordhd.com	https://lordhd.com/	104.28.30.228	104.28.31.228
13.	moviesak47.pro	https://moviesak47.pro	104.27.184.104	104.27.185.104
	moviesak47.in	https://www.moviesak47.in	104.28.16.163	104.28.17.163



14.	subsmovies.nz	http://www1.subsmovies.nz	104.27.15 2.183	104.27.15 3.183

20. This Court further directed the defendant Nos. 24 and 25 to suspend the above-mentioned domain name registration of the Defendant Nos. 1-14 and issue requisite notifications calling upon various ISPs and telecom service providers registered under them to block the aforementioned website identified by the plaintiff.

21. The learned counsel for the plaintiff submits that pursuant to the *ex-parte ad interim* order dated 26.08.2019, the defendant No. 24 has issued the requisite notification. The learned counsel for the plaintiff further states that the defendant Nos. 15 to 23 have blocked the rogue websites i.e., defendant No. 1-14's websites.

22. This Court had also passed the following direction in its order dated 26.08.2019:

18. 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”.

23. In light of the aforesaid direction, the plaintiff filed subsequent applications under Order 1 Rule 10 of CPC for impleadment of such mirror/redirect/alphanumeric website with sufficient supporting evidence, which were allowed by this Court and the *ex-parte ad interim* order dated 26.08.2019 was thereby extended to the Impleaded Defendants:

Sr. No.	Impleaded Defendant Nos.	Details of filing the impleadment application	Date of the order by which impleadment was allowed and disposed of
1.	27-78	I.A. No. 17639 of 2019 Filed on 11.12.2019	17.12.2019
2.	79-118	I.A. No.8547 of 2020 Filed on 21.09.2020	30.09.2020
3.	119-130	I.A. No. 12343 of 2020 Filed on 16.12.2020	23.12.2020
4.	131-157	I.A. No. 7068 of 2021 Filed on 31.05.2021	12.07.2021
5.	158-174	I.A. No.12726 of 2021 Filed on 27.09.2021	04.10.2021
6.	175-212	I.A. No.17180 of 2021	07.02.2022



		Filed on 17.12.2021	
7.	213-224	I.A. No. 3659 of 2022 Filed on 04.03.2022	11.03.2022

24. Thereafter, on 01.08.2022, the learned Joint Registrar (Judicial), passed the following order in regard to rogue websites i.e., Defendant Nos. 1-14, 27-224:-

“...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 plaintiff 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.

At request, let the matter be placed before the Hon’ble Court for further directions.”

25. Since the defendant Nos. 1-14 and 27 to 224 are not appearing, despite notice, in my opinion, the suit can be heard and decided summarily. The defendant Nos. 1-14 and 27 to 224 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 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, read with Rule 27 of the Delhi High Court Intellectual Property Rights Division Rules, 2022.

26. In the present case, applying the test as laid down in *UTV Software* (supra), and considering the documents filed and the averments made in the plaint, which remained uncontroverted, it has to be held that the defendant no. 1-14 and 27-224 are ‘Rogue Websites’, with their primary purpose being to commit and facilitate infringement of the copyright of the plaintiff. The plaintiff is therefore, held entitled to a decree in terms of the prayers made in paragraph 54(i), (ii) and (iii) of the plaint.

27. 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) along with 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.



28. Accordingly, I.A. No. 13799 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.

29. The suit is decreed in terms of prayers given in paragraph no.54 (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 and 27 to 224 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.

30. Let a decree sheet be drawn up accordingly.

NAVIN CHAWLA, J.

OCTOBER 10, 2022

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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**
+ **CS(COMM) 457/2019, I.As. 11595-11597/2019**
WARNER BROS. ENTERTAINMENT INC.

..... Plaintiff

Through: Mr. Sai Krishna Rajagopal, Ms. Disha
Sharma, Ms. Snehima, Ms. Surabhi
Pande and Mr. Vivek Ayyagari,
Advs.

versus

MOVIESFLIX.NET_ & ORS.

..... Defendants

Through:

CORAM:
HON'BLE MR. JUSTICE V. KAMESWAR RAO

ORDER
% 26.08.2019

I.A. 11596/2019 (for exemption)

Exemption allowed subject to all just exceptions.

The application stands disposed of.

I.A. 11597/2019 (under Section 80 CPC)

Issue notice to the non-applicants / Defendant Nos. 24 and 25 by all modes including email, returnable on 24th October 2019.

CS(COMM) 457/2019

1. Let the plaint be registered as a suit.
2. Issue summons to the Defendant Nos. 1 to 14 through email and to Defendant Nos. 15 to 25 through all modes upon filing of Process Fee.
3. The summons to the Defendants shall indicate that a written statement to the plaint shall be filed positively within 30 days from date of receipt of

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summons. Along with the written statement, the Defendants shall also file an affidavit of admission/denial of the documents of the Plaintiff, without which the written statement shall not be taken on record.

4. Liberty is given to the Plaintiff to file a replication within 15 days of the receipt of the written statement. Along with the replication, if any, filed by the Plaintiff, an affidavit of admission/denial of documents of the Defendants, be filed by the Plaintiff, without which the replication shall not be taken on record. If any of the parties wish to seek inspection of any documents, the same shall be sought and given within the timelines.

5. List before the Joint Registrar for marking of exhibits on 27th September 2019. It is made clear that any party unjustifiably denying documents would be liable to be burdened with costs.

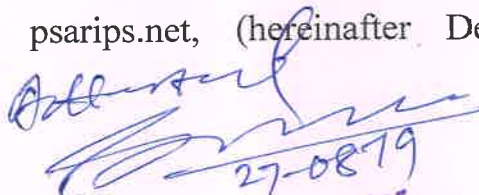
6. List before Court on 24th October 2019.

I.A. 11595/2019 (U/O 39 Rule 1 & 2 CPC)

7. Issue notice to the Defendants by all modes including email, returnable on 24th October 2019.

8. The present suit has been filed for permanent injunction, rendition of accounts and damages etc. Plaintiff-Warner Bros. Entertainment Inc., is a Company incorporated at the state of Delaware, having its office at 4000 Warner Boulevard, Burbank, California 91522, United States of America.

9. Defendants Nos. 1-14, which include moviesflix.net, with the additional domains moviesflixhub.com, moviesflixhub.net, hdmoviearea.com, dailydrivelink.me, dailydrivelink.net, dailydrivelink.in (hereinafter Defendant No. 1); psarips.org, with the additional domain psarips.com, psarips.in, psarips.net, (hereinafter Defendant No. 2);


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world4ufree.store with the additional domains world4ufree.best, world4ufree.com.CO, world4ufree.cool, world4ufree.fun (hereinafter Defendant No. 3); moviebaba.in (hereinafter Defendant No. 4); 123movies.domains, with the additional domains 123moviesback.org, 123moviesback.com, 123movies.gdn, 123moviesla.com, 123moviesz.pro, is123movies.site, www.123movies.site, 123movies2019.com, 123movieshq.org, 123movies.st, 123movies.la, 123movie.uk, go123movies.io, gostream.site, gostream.nu (hereinafter Defendant No. 5); mkvcinemas.eu, with the additional domains mkvcinemas.pro, mkvcinemas.live, mkvcinemas.pw, mkvcinemas.com, mkvcinemas.cz, mkvcage.fun, mkvcage.com, mkvhub.com, mkvrips.com, 480mkv.net, 480mkv.com, mkvcinemas.be (hereinafter Defendant No. 6); pahe.in (hereinafter Defendant No. 7); ettv.to, with the additional domains katcr.co, kickassl.to, kat.ag, kickass.sx, kikass.to, kat.sx(hereinafter Defendant No. 8); fullmaza.ch with the additional domains fullmaza.vip, fullmaza.org (hereinafter Defendant No. 9); watchseries.fm, with the additional domains watch-series.co, watch-series.live, watch-series.ru, watch-series.cc, watchseriesnet.net, on.mywatchseries.stream, get.mywatchseries.stream, swatchseries.to, dwatchseries.to, gowatchseries.tv, gowatchseries.co, watchseries.to, watch-series.ac (hereinafter Defendant No. 10); hdpopcorns.me with the additional domain hdpopcorns.online (hereinafter Defendant No. 11); lordhd.com(hereinafter Defendant No. 12); moviesak47.pro with the additional domain moviesak47.in(hereinafter Defendant No. 13); subsmovies.nz (hereinafter Defendant No. 14) [hereinafter collectively referred to as "**Defendant Websites**"], are online locations which enables users of the Defendant Websites' services to: (a)

view (by a process known as "streaming / downloading") cinematograph films, being motion pictures, television programs or other audio-visual content, on devices connected to the Internet; (b) cause copies of those cinematograph films to be downloaded onto the memory of their devices for watching later or enabling others to watch or further copy those cinematograph films; and/or (c) identify other online locations including (by a process known as "linking") which enables those users to engage in the activities set out in (a) or (b).

10. It is stated in the plaint that Defendant Websites are primarily and substantially engaged in communicating to the public, hosting, streaming and/or making available to the public Plaintiff's original content without authorization, and/or facilitating the same. Defendant Nos. 1 to 14 are making available, illegally and unauthorizedly, content of various third parties like UTV Software Communications Ltd., STAR India Pvt. Ltd., Disney Enterprises, Inc., Paramount Pictures Corporation, Columbia Pictures Industries, Inc., Universal City Studios LLC., and Netflix Entertainment Services India LLP, etc. (hereinafter referred to as 'studios').

11. It is further submitted that Plaintiff's films are works of visual recording and include sound recordings accompanying such visual recordings, which qualify as a "cinematograph film" under Section 2(f) of the Copyright Act, 1957 (hereinafter 'the Act'). Further, by virtue of Section 13(1) read with Section 13(2), Section 5 and Section 40 of the Act, the Plaintiff's cinematograph films whether released or not released in India would be entitled to all rights and protections granted under the Act for cinematograph films. The cinematograph films produced by the Plaintiff are "works" as defined under Section 2(y) of the Act. Plaintiff has all the rights

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New Delhi

in such cinematograph films granted under Section 14(d) of the Act, and Plaintiff is author and/or first owner and/or owners (under Section 17 of the Act) of the following illustrative list of cinematograph films that are entitled to protection under the Act:

S.No.	Film	Year
1.	Aquaman	2018
2.	A Star Is Born	2018
3.	Wonder Woman	2017
4.	Arrow, Season 7, Episode 22	2019

12. In order to protect and enforce their exclusive rights, the Plaintiff investigated and monitored the Defendant Websites and gathered evidence of their infringing activity. During the period of investigation the Defendant Websites infringed the Plaintiff's Original Content or facilitated the same, using or facilitating the use of the Defendant Websites, inter alia, by downloading and streaming the Plaintiff's Original Content. The illustrative list of illegal content made available by Defendant Nos. 1 to 14, that are entitled to protection under the Act are mentioned hereinbelow:

Studio	Film	Year
Columbia	Miracles from Heaven	2016
Columbia	This is the End	2013
DEI	Finding Dory	2016
DEI	The Jungle Book	2016

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Paramount	Transformers: The Last Knight	2017
Paramount	Transformers: Age of Extinction	2014
Paramount	xXx: Return of Xander Cage	2017
Universal	Straight Outta Compton	2015
Universal	The Purge: Election Year	2016
Universal	The Secret Life of Pets	2016
Netflix	Stranger Things	2017- 2019
Netflix	Santa Clarita Diet	2018- 2019

13. Learned counsel for the Plaintiff submits that legal notice was served upon the Defendant Websites calling upon them to cease from engaging in their infringing activities. Despite such legal notices, the Defendant Websites continue to infringe the rights in Plaintiff's Original Content. The Defendant Websites are therefore willfully infringing Copyright material and ignoring or failing to respond to notice to cease all infringement. He further submits that, access of the Defendant Websites has been disabled in other jurisdictions such as 123movies.st (Defendant No. 5) has been blocked in Australia; gostream.site (Defendant No. 5) has been blocked in Australia and Italy; katcr.co (Defendant No. 8) has been blocked in Belgium, Denmark, Indonesia, Italy, Malaysia and Portugal; smatchseries.to (Defendant No. 10) has been blocked in Belgium, Denmark and Norway; watch-series.co (Defendant No. 10) has been blocked in Australia, Denmark and Malaysia; gowatchseries.co (Defendant No. 10) has been blocked in Denmark; gowatchseries.tv (Defendant No. 10) has been blocked in United Kingdom; hdpopcorns.com an additional domain of Defendant No. 11 has

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beem blocked in Australia, Indonesia and Malaysia; submovies.nz (Defendant No. 14) has been blocked in Australia, Denmark and Italy.

16. Learned Counsel for the Plaintiff submits that Defendant Websites provides illegal content directly for free without any requirement of registration by users, and such availability of content is supported by the advertisements featured on the website. The primary purpose of the Defendant Websites is to commit or facilitate copyright infringement. Thus, Defendant Nos. 1 to 14 is liable for infringement under Section 51(a)(ii), Section 51(b), and Section 51(a)(i) for making a copy of the Original Content including the storing of it in any medium by electronic or other means and communicating the Original Content to the public. Further the hosting, streaming, reproducing, distributing, making available to the public, and/or communicating to the public of the Original Content, or facilitating the same, without authorization of the Plaintiff amounts to violation of the Plaintiff's copyright work, protected under the Act. In support of his contentions reliance has also been placed on the decision of this court in ***CS(COMM) 724/2017*** dated 10th April, 2019, ***UTV Software Communication Ltd. vs. 1337X.TO and Ors.***

14. Plaintiff has arrayed various internet and telecom services providers (ISPs) as Defendant Nos. 15-23 (hereinafter "the said ISPs") in the present suit to ensure the effective implementation of any relief that this Hon'ble Court may grant in favour of the Plaintiff. The limited relief being claimed against the said ISPs is to ensure the effective implementation of any order that this Hon'ble Court may be pleased to grant in favour of the Plaintiff by disabling access of the Defendant Websites in India.

15. Plaintiff has also arrayed Defendant No. 24, the Department of

Telecommunications (DoT), and Defendant No. 25, the Ministry of Electronics and Information Technology (MEITY), for a similar reason. The limited relief being claimed against the DoT and the MEITY is the issuance of a notification to the internet and telecom service providers registered with it to disable access into India of the Defendant Websites.

16. In view of the averments noted hereinabove and in view of the judgment passed in *UTV Software Communication Ltd.* (supra), this Court is of the opinion that a prima facie case is made out in favour of the Plaintiff and balance of convenience is also in its favour. Further, irreparable harm or injury would be caused to the Plaintiff if an interim injunction order is not passed.

17. Consequently, Defendant Nos. 1-16 (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. 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

Attested
27/08/19

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.

19. Defendant Nos. 15-23, shall ensure compliance of this order by blocking, the websites, their URL's and the respective IP address as under:

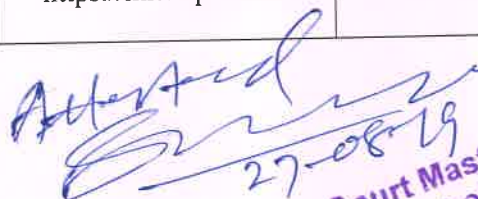
S.No	Domains	URLs	IP Addresses	
1.	moviesflix.net	https://moviesflix.net/	104.27.158.101	104.27.159.101
	moviesflixhub.net	https://moviesflixhub.net/	104.31.82.218	104.31.83.218
	moviesflixhub.com	www.moviesflixhub.com	104.18.34.197	104.18.35.197
	hdmoviearea.com	https://hdmoviearea.com/	104.31.66.64	104.31.67.64
	dailydrivelink.net	http://dailydrivelink.net	104.27.140.106	104.27.141.106
	dailydrivelink.in	http://dailydrivelink.in	104.28.6.222	104.28.7.222
	dailydrivelink.me	https://dailydrivelink.me/	104.24.120.188	104.24.121.188
2.	psarips.org	https://psarips.org/	93.174.89.4	
	psarips.com	https://psarips.com		
	psarips.in	https://psarips.in		
	psarips.net	https://psarips.net		
3.	world4ufree.best	https://world4ufree.best/	104.27.184.87	104.27.185.87
	world4ufree.com.c	https://world4ufree.com.c	104.18.32.222	104.18.33.222
	o	o		
	world4ufree.store	https://world4ufree.store	192.124.249.159	

Attorney General
[Signature]
 27-08-19

	world4ufree.fun	https://world4ufree.fun	104.27.144.38	104.27.145.38
	world4ufree.cool	https://world4ufree.cool	104.28.28.199	104.28.29.199
4.	moviebaba.in	http://moviebaba.in/	104.27.186.85	104.27.187.85
5.	123movies.domains	https://ww1.123movies.do mains/	104.31.68.37	104.31.69.37
	123movies.la	https://www3.123movies.l a/	104.25.107.102	104.25.108.102
	123moviesback.org	https://www.123moviesba ck.org/	104.27.166.24	104.27.167.24
	123moviesback.co m	https://www.123moviesba ck.com	104.31.84.11	104.31.85.11
	123movies.gdn	https://www.123movies.g dn/	104.25.88.28	104.25.89.28
	123moviesla.com	https://www.123moviesla. com	104.24.104.218	104.24.105.218
	123movie.uk	https://w3.123movie.uk/	199.188.201.159	
	gostream.nu	https://gostream.nu	104.31.94.223	104.31.95.223
	123moviesz.pro	https://www.123moviesz. pro/	104.24.124.223	104.24.125.223
	is123movies.site	https://is123movies.site/	104.28.22.9	104.28.23.9
	123movies2019.co m	https://www.123movies20 19.com	104.27.146.147	104.27.147.147
	gostream.site	<u>https://gostream.site</u>	104.18.60.72	104.18.61.72
	go123movies.io	https://www2.go123movi	104.27.142.213	104.27.143.213

Attended
[Signature]
27/08/19

		es.io/		
	123movieshq.org	https://123movieshq.org/	104.18.42.58	104.18.43.58
	123movies.st	https://www6.123movies. st/	104.31.114.13	104.31.115.13
6.	mkvcinemas.pro	https://www.mkvcinemas. pro/	104.27.188.121	104.27.189.121
	mkvcinemas.cz	https://www.mkvcinemas. cz	104.28.24.84	104.28.25.84
	mkvcinemas.eu	https://www.mkvcinemas. eu/	104.27.188.153	104.27.189.153
	mkvcinemas.pw	https://mkvcinemas.pw	104.28.8.69	104.28.9.69
	mkvcinemas.com	https://mkvcinemas.com	104.31.78.10	104.31.79.10
	mkvcinemas.live	https://mkvcinemas.live/	104.27.148.32	104.27.149.32
	mkvcinemas.be	https://www.mkvcinemas. be/	104.18.58.198	104.18.59.198
	mkvhub.com	https://www.mkvhub.com /	104.31.64.69	104.31.65.69
	mkvcage.com	https://www.mkvcage.co m/	104.24.98.153	104.24.99.153
	mkvcage.fun	https://www.mkvcage.fun /	104.27.172.131	104.27.173.131
	480mkv.net	https://480mkv.net/	104.27.172.131	104.24.117.158
	480mkv.com	https://480mkv.com	104.31.80.82	104.31.81.82
	mkvrips.com	https://mkvrips.com/	104.18.62.90	104.18.63.90


 Court Master
 High Court of Delhi
 New Delhi

7.	pahe.in	https://pahe.in/	104.27.132.141	104.27.133.141
8.	etv.to	https://www.etv.to/	104.25.158.33	104.25.159.33
	kater.co	https://kater.co/	192.64.119.34	91.212.150.157
	kickass1.to	https://kickass1.to/	104.31.18.30	104.31.19.30
	kikass.to	https://kikass.to/	104.27.150.245	104.27.151.245
	kat.sx	https://kat.sx/	104.31.16.3	104.31.17.3
	kickass.sx	https://kickass.sx/	104.31.18.30	104.31.19.30
	kat.ag	https://kat.ag	104.31.18.30	104.31.19.30
9.	fullmaza.vip	https://fullmaza.vip/	104.27.176.218	104.27.177.218
	fullmaza.ch	https://fullmaza.ch/	104.27.174.146	104.27.175.146
	fullmaza.org	https://fullmaza.org	104.27.190.251	104.27.191.251
10.	swatchseries.to	https://www1.swatchseries.to/	104.31.18.30	104.31.19.30
	dwatchseries.to	https://dwatchseries.to	104.31.18.30	104.31.19.30
	watch-series.ac	https://watch-series.ac	104.18.58.170	104.18.59.170
	watch-series.co	https://ww6.watch-series.co/	104.25.206.11	104.25.207.11
	watchseries.fm	https://watchseries.fm/	172.64.104.16	172.64.105.16
	watch-series.live	https://www4.watch-series.live/	104.26.4.194	104.26.5.194
	Watch-series.cc	Watch-series.cc	185.38.15.148	
	Watch-series.ru	Watch-series.ru	104.31.92.31	104.31.93.31
	mywatchseries.stream	https://on.mywatchseries.stream	104.28.28.173	104.28.29.173
	mywatchseries.stream	https://get.mywatchseries.stream/	104.28.28.173	104.28.29.173
	watchseries.to	https://ww1.watchseries.to/	104.31.64.104	104.31.65.104
watchseriesnet.net	http://www5.watchseriesnet.net	104.31.72.66	104.31.73.66	

Attorney General
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	mywatchseries.stream	https://mywatchseries.stream	104.28.28.173	104.28.29.173
	gowatchseries.tv	https://www2.gowatchseries.tv/	104.26.6.88	104.26.7.88
	gowatchseries.co	https://ww5.gowatchseries.co	104.26.14.159	104.26.15.159
11.	hdpopcorns.online	https://hdpopcorns.online/	104.24.102.92	104.24.103.92
	hdpopcorns.me	https://www.hdpopcorns.me	104.24.106.249	104.24.107.249
12.	lordhd.com	https://lordhd.com/	104.28.30.228	104.28.31.228
13.	moviesak47.pro	https://moviesak47.pro	104.27.184.104	104.27.185.104
	moviesak47.in	https://www.moviesak47.in	104.28.16.163	104.28.17.163
14.	subsmovies.nz	http://www1.subsmovies.nz	104.27.152.183	104.27.153.183

Further, Defendant Nos. 24 and 25 are directed to suspend the aforementioned domain name registration of Defendant Nos. 1 to 14 and issue requisite notifications calling upon various internet and telecom service providers registered under them to block the aforementioned websites identified by Plaintiff.

20. Let provisions of Order XXXIX Rule 3 CPC be complied by way of email within a period of one week.

21. A copy of this order be given *dasti* under the signature of the Court Master.

AUGUST 26, 2019/aky

V. KAMESWAR RAO, J

Attorney
[Signature]
 27/08/19

Court Master
 High Court of Delhi
 New Delhi

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

I.A. NO. _____ OF 2022

IN

CS(COMM) NO. 457 OF 2019

IN THE MATTER OF:

Warner Bros. Entertainment Inc. ...Plaintiff

Versus

MOVIESFLIX.NET & Ors. ..Defendants

JURISDICTION VALUE – INR 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.225 to 231 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. 457 OF 2019

IN THE MATTER OF:

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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

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

IN
CS(COMM) NO 457 OF 2019

IN THE MATTER OF:

Warner Bros. Entertainment Inc. ...Plaintiff

Versus

MOVIESFLIXN.NET & 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
(ORDINARY ORIGINAL COMMERCIAL JURISDICTION)

IN

CS(COMM) NO 457 OF 2019

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

In the matter of :

Warner Bros. Entertainment Inc. ...Plaintiff

Versus

MOVIESFLIX.NET & Ors.Defendants

Sir,

Will you kindly treat the accompanying application as an urgent one in accordance with the High Court Rules and Orders and list the present application before the Ld. Joint Registrar as per judgement dated 10.10.2022 passed by this Hon'ble Court in the instant suit. The relevant portion of the said judgement has been extracted herein below:

29.The suit is decreed in terms of prayers given in paragraph no.54 (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 and 27 to 224's 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.

The grounds of urgency:

As prayed.

Place: New Delhi

Date: 12th December, 2022

Yours faithfully,



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 14:50:50
NAMES OF THE ACC/ REGISTERED USER :	SHCIL
LOCATION :	DELHI HIGH COURT
e-COURT RECEIPT NO :	DLCT0940L22500669
e-COURT FEE AMOUNT :	₹ 20 (Rupees Twenty Only)



DLCT0940L22500669

Statutory Alert : The authenticity of this e-Court fee receipt should be verified at www.shcilstamp.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 457 OF 2019

IN THE MATTER OF:

Warner Bros. Entertainment Inc. ...Plaintiff

Versus

MOVIESFLIX.NET & 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 a 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 Plaintiff 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:

225. katmoviehd.fr
226. katmoviehd.bz
227. katmoviehd.rs
228. mkvmoviespoint.icu
229. mkvmoviespoint.art
230. pahe.li
231. swatchseries.is

(hereinafter referred to as ‘Proposed Defendant Websites’) as Defendant Nos. 225 to 231. The additional mirrors/redirects/alphanumeric variations, who the Plaintiff 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. 26) or “John Doe ” was also impleaded as party to the suit and leave

of this Hon'ble Court was duly sought by the Plaintiff to amend the memo of parties and substitute all such Ashok Kumar with specific websites which were found violating the Plaintiff's exclusive rights. In this regard, reliance is placed upon paragraph 38 of the Plaint.

4. It is submitted that *vide* Orders dated 17.12.2019, 30.09.2020, 23.12.2020, 12.07.2021, 04.10.2021, 07.02.2022 and 11.03.2022 this Hon'ble Court was pleased to pass an order impleading Defendant Nos. 27 to 78, 79 to 118, 119 to 130, 131 to 157, 158 to 174 , 175 to 212 and 213 to 224 respectively. In accordance with the judgment dated 10.10.2022, Plaintiff is seeking to implead the present Proposed Defendant as Defendant Nos. 225 to 231.
5. It is submitted that *vide* Order dated 26.08.2019, 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:

“17. Consequently, Defendants Nos. 1-16 (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. 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.

19. Defendant Nos. 15-23, shall ensure compliance of this order by blocking, the websites, their URL's and the respective IP address as under:

<i>S.No.</i>	<i>Domains</i>	<i>URLs</i>	<i>IP Addresses</i>	
<i>1.</i>	<i>moviesflix.net</i>	<i>https://moviesflix.net/</i>	<i>104.27.158.101</i>	<i>104.27.159.101</i>
	<i>moviesflixhub.net</i>	<i>https://moviesflixhub.net/</i>	<i>104.31.82.218</i>	<i>104.31.83.218</i>
	<i>moviesflixhub.com</i>	<i>www.moviesflixhub.com</i>	<i>104.18.34.197</i>	<i>104.18.35.197</i>

	<i>hdmoviearea.com</i>	<i>https://hdmoviearea.com/</i>	<i>104.31.66.64</i>	<i>104.31.67.64</i>
	<i>dailydrivelink.net</i>	<i>http://dailydrivelink.net</i>	<i>104.27.140.106</i>	<i>104.27.141.106</i>
	<i>dailydrivelink.in</i>	<i>http://dailydrivelink.in</i>	<i>104.28.6.222</i>	<i>104.28.7.222</i>
	<i>dailydrivelink.me</i>	<i>https://dailydrivelink.me/</i>	<i>104.24.120.188</i>	<i>104.24.121.188</i>
2.	<i>psarips.org</i>	<i>https://psarips.org/</i>	<i>93.174.89.4</i>	
	<i>psarips.com</i>	<i>https://psarips.com</i>		
	<i>psarips.in</i>	<i>https://psarips.in</i>		
	<i>psarips.net</i>	<i>https://psarips.net</i>		
3.	<i>world4ufree.best</i>	<i>https://world4ufree.best/</i>	<i>104.27.184.87</i>	<i>104.27.185.87</i>
	<i>world4ufree.com</i>	<i>https://world4ufree.com</i>	<i>104.18.32.222</i>	<i>104.18.33.222</i>
	<i>world4ufree.store</i>	<i>https://world4ufree.store</i>	<i>192.124.249.159</i>	
	<i>world4ufree.fun</i>	<i>https://world4ufree.fun</i>	<i>104.27.144.38</i>	<i>104.27.145.38</i>
	<i>world4ufree.cool</i>	<i>https://world4ufree.cool</i>	<i>104.28.28.199</i>	<i>104.28.29.199</i>
4.	<i>moviebaba.in</i>	<i>http://moviebaba.in/</i>	<i>104.27.186.85</i>	<i>104.27.187.85</i>

5.	<i>123movies.dom ains</i>	<i>https://ww1.123 movies.domains /</i>	<i>104.31.68.37</i>	<i>104.31.69.37</i>
	<i>123movies.la</i>	<i>https://www3.1 23movies.la/</i>	<i>104.25.107.1 02</i>	<i>104.25.108.1 02</i>
	<i>123moviesback. org</i>	<i>https://www.12 3moviesback.or g/</i>	<i>104.27.166.2 4</i>	<i>104.27.167.2 4</i>
	<i>123moviesback. com</i>	<i>https://www.12 3moviesback.co m</i>	<i>104.31.84.11</i>	<i>104.31.85.11</i>
	<i>123movies.gdn</i>	<i>https://www.12 3movies.gdn/</i>	<i>104.25.88.28</i>	<i>104.25.89.28</i>
	<i>123moviesla.co m</i>	<i>https://www.12 3moviesla.com</i>	<i>104.24.104.2 18</i>	<i>104.24.105.2 18</i>
	<i>123movie.uk</i>	<i>https://w3.123m ovie.uk/</i>	<i>199.188.201. 159</i>	
	<i>gostream.nu</i>	<i>https://gostrea m.nu</i>	<i>104.31.94.22 3</i>	<i>104.31.95.22 3</i>
	<i>123moviesz.pro</i>	<i>https://www.12 3moviesz.pro/</i>	<i>104.24.124.2 23</i>	<i>104.24.125.2 23</i>
	<i>is123movies.sit e</i>	<i>https://is123mo vies.site/</i>	<i>104.28.22.9</i>	<i>104.28.23.9</i>
	<i>123movies2019. com</i>	<i>https://www.12 3movies2019.co m</i>	<i>104.27.146.1 47</i>	<i>104.27.147.1 47</i>
	<i>gostream.site</i>	<i>https://gostrea m.site</i>	<i>104.18.60.72</i>	<i>104.18.61.72</i>

	<i>go123movies.io</i>	<i>https://www2.go123movies.io/</i>	<i>104.27.142.213</i>	<i>104.27.143.213</i>
	<i>123movieshq.org</i>	<i>https://123movieshq.org/</i>	<i>104.18.42.58</i>	<i>104.18.43.58</i>
	<i>123movies.st</i>	<i>https://www6.123movies.st/</i>	<i>104.31.114.13</i>	<i>104.31.115.13</i>
6.	<i>mkvcinemas.pro</i>	<i>https://www.mkvcinemas.pro/</i>	<i>104.27.188.21</i>	<i>104.27.189.21</i>
	<i>mkvcinemas.cz</i>	<i>https://www.mkvcinemas.cz</i>	<i>104.28.24.84</i>	<i>104.28.25.84</i>
	<i>mkvcinemas.eu</i>	<i>https://www.mkvcinemas.eu/</i>	<i>104.27.188.53</i>	<i>104.27.189.53</i>
	<i>mkvcinemas.pw</i>	<i>https://mkvcinemas.pw</i>	<i>104.28.8.69</i>	<i>104.28.9.69</i>
	<i>mkvcinemas.com</i>	<i>https://mkvcinemas.com</i>	<i>104.31.78.10</i>	<i>104.31.79.10</i>
	<i>mkvcinemas.live</i>	<i>https://mkvcinemas.live/</i>	<i>104.27.148.2</i>	<i>104.27.149.2</i>
	<i>mkvcinemas.be</i>	<i>https://www.mkvcinemas.be/</i>	<i>104.18.58.8</i>	<i>104.18.59.8</i>
	<i>mkvhub.com</i>	<i>https://www.mkvhub.com/</i>	<i>104.31.64.69</i>	<i>104.31.65.69</i>
	<i>mkvcage.com</i>	<i>https://www.mkvcage.com/</i>	<i>104.24.98.3</i>	<i>104.24.99.3</i>
	<i>mkvcage.fun</i>	<i>https://www.mkvcage.fun/</i>	<i>104.27.172.31</i>	<i>104.27.173.31</i>
	<i>480mkv.net</i>	<i>https://480mkv.net/</i>	<i>104.27.172.31</i>	<i>104.24.117.58</i>

	<i>480mkv.com</i>	<i>https://480mkv.com</i>	<i>104.31.80.82</i>	<i>104.31.81.82</i>
	<i>mkvrips.com</i>	<i>https://mkvrips.com/</i>	<i>104.18.62.90</i>	<i>104.18.63.90</i>
7.	<i>pahe.in</i>	<i>https://pahe.in/</i>	<i>104.27.132.141</i>	<i>104.27.133.141</i>
8.	<i>ettv.to</i>	<i>https://www.ettv.to/</i>	<i>104.25.158.33</i>	<i>104.25.159.33</i>
	<i>katcr.co</i>	<i>https://katcr.co/4</i>	<i>192.64.119.34</i>	<i>91.212.150.157</i>
	<i>kickass1.to</i>	<i>https://kickass1.to/</i>	<i>104.31.18.30</i>	<i>104.31.19.30</i>
	<i>kikass.to</i>	<i>https://kikass.to/</i>	<i>104.27.150.245</i>	<i>104.27.151.245</i>
	<i>kat.sx</i>	<i>https://kat.sx/</i>	<i>104.31.16.3</i>	<i>104.31.17.3</i>
	<i>kickass.sx</i>	<i>https://kickass.sx/</i>	<i>104.31.18.30</i>	<i>104.31.19.30</i>
	<i>kat.ag</i>	<i>https://kat.ag</i>	<i>104.31.18.30</i>	<i>104.31.19.30</i>
9.	<i>fullmaza.vip</i>	<i>https://fullmaza.vip/</i>	<i>104.27.176.218</i>	<i>104.27.177.218</i>
	<i>fullmaza.ch</i>	<i>https://fullmaza.ch/</i>	<i>104.27.174.146</i>	<i>104.27.175.146</i>
	<i>fullmaza.org</i>	<i>https://fullmaza.org</i>	<i>104.27.190.251</i>	<i>104.27.191.251</i>
10.	<i>swatchseries.to</i>	<i>https://www1.swatchseries.to/</i>	<i>104.31.18.30</i>	<i>104.31.19.30</i>
	<i>dwatchseries.to</i>	<i>https://dwatchseries.to</i>	<i>104.31.18.30</i>	<i>104.31.19.30</i>

	watch-series.ac	https://watch-series.ac	104.18.58.17 0	104.18.59.17 0
	watch-series.co	https://ww6.wat-ch-series.co/	104.25.206.1 1	104.25.207.1 1
	watchseries.fm	https://watchseries.fm/	172.64.104.1 6	172.64.105.1 6
	watch-series.live	https://www4.watch-series.live/	104.26.4.194	104.26.5.194
	Watch-series.cc	Watch-series.cc	185.38.15.14 8	
	Watch-series.ru	Watch-series.ru	104.31.92.31	104.31.93.31
	mywatchseries.stream	https://on.mywatchseries.stream	104.28.28.17 3	104.28.29.17 3
	mywatchseries.stream	https://get.mywatchseries.stream/	104.28.28.17 3	104.28.29.17 3
	watchseries.to	https://ww1.watchseries.to/	104.31.64.10 4	104.31.65.10 4
	watchseriesnet.net	http://www5.watchseriesnet.net	104.31.72.66	104.31.73.66
	mywatchseries.stream	https://mywatchseries.stream	104.28.28.17 3	104.28.29.17 3
	gowatchseries.tv	https://www2.gowatchseries.tv/	104.26.6.88	104.26.7.88
	gowatchseries.co	https://ww5.gowatchseries.co	104.26.14.15 9	104.26.15.15 9
11.	hdpopcorns.online	https://hdpopcorns.online/	104.24.102.9 2	104.24.103.9 2

	<i>hdpopcorns.me</i>	<i>https://www.hdpopcorns.me</i>	104.24.106.2 49	104.24.107.2 49
12.	<i>lordhd.com</i>	<i>https://lordhd.com/</i>	104.28.30.22 8	104.28.31.22 8
13.	<i>moviesak47.pro</i>	<i>https://moviesak47.pro</i>	104.27.184.1 04	104.27.185.1 04
	<i>moviesak47.in</i>	<i>https://www.moviesak47.in</i>	104.28.16.16 3	104.28.17.16 3
14.	<i>subsmovies.nz</i>	<i>http://www1.subsmovies.nz</i>	104.27.152.1 83	104.27.153.1 83

Further, Defendant Nos. 24 and 25 are directed to suspend the aforementioned domain name registration of Defendant Nos. 1 to 14 and issue requisite notifications calling upon various internet and telecom service providers registered under them to block the aforementioned websites identified by Plaintiff.”

Copy of the Order dated 26.08.2019 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 FIOs."

(emphasis supplied)

99. *Though the dynamic injunction was issued by the Singapore High Court under the provisions of Section 193 DDA of the Singapore Copyright Act, and no similar procedure exists in India, yet in order to meet the ends of justice and to address the menace of piracy, this Court in exercise of its inherent power under Section 151 CPC permits the plaintiffs to implead the mirror/redirect/alphanumeric websites under Order I Rule 10 CPC as these websites merely provide access to the same websites which are the subject of the main injunction.*
100. *It is desirable that the Court is freed from constantly monitoring and adjudicating the issue of mirror/redirect/alphanumeric websites and also that the plaintiffs are not burdened with filing fresh suits. However, it is not disputed that given the wide ramifications of site-wide blocking orders, there has to be judicial scrutiny of such directions and that ISPs ought not to be tasked with the role of arbiters, contrary to their strictly passive and neutral role as intermediaries.*
101. *Consequently, along with the Order I Rule 10 application for impleadment, the plaintiffs shall file an affidavit confirming that the newly impleaded website is a mirror/redirect/alphanumeric website with sufficient supporting evidence. On being satisfied that the impugned website is indeed a*

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

Copy of the judgement dated 10.04.2019 is attached herewith.

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 the 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 judgement dated 10.10.2022. It is submitted that, this Hon'ble Court was pleased to record that the Defendant Websites are Rogue Websites and further held that such rogue websites can be blocked by filing an impleadment application under Order 1 Rule 10 along with the evidence against them following the Judgment dated 10.10.2022. The relevant portion of the judgement is reiterated hereinbelow:

*29. The suit is, therefore, decreed in terms of prayers given in paragraph no.54 (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, and 27 to 224's 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 Judgement dated 10.10.2022, 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 merely providing a new means of accessing the same primary infringing websites that have been enjoined. Therefore, the said Defendant 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 No.225 to 231*, to the instant suit and extend the permanent injunction dated 10.10.2022;

- b. Pass an order directing the Defendants No. 15 to 23, 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. 24 and 25, 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 the time of suit as well as additionally implored websites)	URL of New Mirror/Redirect/Alphanumeric Variation of Injuncted Website	Domain Name of Mirror/Redirect/Alphanumeric Variation of Injuncted Website	IP Addresses of New Mirror/Redirect/Alphanumeric Variation of Injuncted Website
moviesflix.net moviesflixhub.com moviesflixhub.net	https://katmoviehd.fr	katmoviehd.fr	104.21.1.122
			172.67.129.54
hdmoviearea.com dailydrivelink.me dailydrivelink.net dailydrivelink.in	https://katmoviehd.bz	katmoviehd.bz	104.21.64.72
			172.67.178.115
psarips.org psarips.com	http://katmoviehd.rs	katmoviehd.rs	172.67.210.104
			104.21.42.218
psarips.in psarips.net	https://swatchseries.is	swatchseries.is	172.67.148.125
			104.21.39.207
world4ufree.store world4ufree.best world4ufree.com.co world4ufree.cool world4ufree.fun	https://pahe.li	pahe.li	192.124.249.26
			104.21.90.183
moviebaba.in	https://mkvmoviespoint.icu	mkvmoviespoint.icu	172.67.203.209
			172.67.196.116
123movies.domains	https://mkvmoviespoint.art	mkvmoviespoint.art	104.21.36.152
123moviesback.org			
123moviesback.com			
123movies.gdn			

123moviesla.com			
123moviesz.pro			
is123movies.site			
123movies2019.com			
123movieshq.org			
123movies.st			
123movies.la			
123movie.uk			
go123movies.io			
gostream.site			
gostream.nu			
mkvcinemas.eu			
mkvcinemas.pro			
mkvcinemas.live			
mkvcinemas.pw			
mkvcinemas.com			
mkvcinemas.cz			
mkvcage.fun			
mkvcage.com			
mkvhub.com			
mkvrips.com			
480mkv.net			
480mkv.com			
mkvcinemas.be			
pahe.in			
etv.to			
katcr.co			
kickass1.to			
kat.ag			
kickass.sx			

kikass.to			
kat.sx			
fullmaza.ch			
fullmaza.vip			
fullmaza.org			
watchseries.fm			
watch-series.co			
watch-series.live			
watch-series.ru			
watch-series.cc			
watchseriesnet.net			
on.mywatchseries.str			
eam			
mywatchseries.strea			
m			
get.mywatchseries.st			
ream			
swatchseries.to			
dwatchseries.to			
gowatchseries.tv			
gowatchseries.co			
watchseries.to			
watch-series.ac			
Hdpopcorns.me			
Hdpopcorns.online			
Lordhd.com			
Moviesak47.pro			
Moviesak47.in			
Subzmovies.nz			
123movies.actor			

123movies.best			
123movies.cat			
123movies01.to			
123movies009.com			
123moviesfull.me			
123movies.cc			
Go123movies.to			
Portalnews.me			
Video123movies.co m			
480ptvseries.info			
World4ufree.surf			
World4ufree.casa			
World4ufree.com			
World4ufree.host			
World4ufree.press			
Fullmaza.site			
Fullmaza.de			
Altdownload.com			
Gowatchseries.fm			
Gowatchseries.me			
Gowatchseries.video			
Hdpopcorns.ws			
Hdpopcorns.eu			
Hdpopcorns.blue			
Hdpopcorns.club			
Hdpopcorns.cc			
Isubsmovies.com			
Kickass-kat.com			
Kkat.net			

Thekat.cc			
Moviezflix.net			
Moviesflix.epizy.com			
Moviezflix.in			
Moviesflix.cc			
Movieshunk.net			
480mkv.org			
My480mkv.com			
480mkv.net			
Psarips.eu			
Mkvhub.unblockninja.icu			
Mkvcinemas.win			
Mkvc.org			
Lordhd.net			
Watchseries.si			
Watchseries.movie			
Watchseries.fyi			
Watch-series.cx			
Watchseries.ws			
Watchseries.rocks			
Watchseries.fi			
Cinemamkv.net			
katmoviehd.nu			
katmoviehd.mobi			
kat.rip			
kickasstorrents.to			
kickasstorrent.cr			
thekat.app			

123movie.ag online0123movies.c om 123movies2020.org 0123movie.net 0123movies.su 123moviesfree.sc go123movies.co video123movies.co watchseries.cn fullmaza.nl fullmaza.blog fullmaza.bz fullmaza.info lordhd.in mkvhub.net mkvhero.com mkvhub.org mkvking.com mkvflix.fun mkvflix.live mkvmad.cc mkvmad.net mkv4u.co mkvmoviespoint.net mkvmoviespoint.asia mkvmoviespoint.in.n et mkvfullmovies.com mkvmoviesking.com			
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moviesflix.buzz			
moviesflixpro.org			
moviesflix.in			
psarips.xyz			
series.movie			
gowatchseries.io			
kickasstorrents.cr			
thekickasstorrents.to			
watchserieshd.tv			
watchserieshd.co			
watchseries.video			
123moviesfreego.co			
m			
123moviesfree.ws			
123movie.uk			
movies123.click			
123moviesfree.ltd			
psarips.uk			
psarips.one			
123moviesfun.is			
123-movies.club			
123moviesfree.net			
123movie.cc			
123movies.email			
123movies.market			
123movie.show			
123movie.movie			
123moviesgo.tv			
real-123movies.best			
123moviesca.com			

123movies.codes			
123movies.study			
123movies.movie			
1-2-3movies.com			
123movies.coffee			
123movies.review			
123movies.productions			
top123movies.com			
123movies.online			
123movies-official.site			
axxo.me			
gowatchseries.bz			
watchseries.ninja			
watchseries.co			
watchseries.so			
watchseriesfree.co			
katmoviehd.sk			
katmoviehd.sx			
katmoviehd.se			
katmoviehd.si			
katmoviehd.nl			
ettvcentral.com			
mkvking.net pahe.ph			
unblockninja.com11			
23movies.vu			
123movies.page			
swatchseries.ru			

themoviesflix.co.com			
themoviesflix.io			
themoviesflix.cc			
themoviesflix.in.net			
themoviesflix.co			
mkvcinemas.pl			
mkvcinemas.top			
mkvcinemas.club			
mkvcinemas.tel			
mkvcinemas.in			
hdmoviesflix.com.co			
hdmoviesflix.in.net			
123-movies.as			
123movies.gy			
123-movies.gy			
123movies.vu			
w-123movies.com			
the123movies.eu			
123moviess.sc			
123movies-one.com			
123moviesday.com			
123movies.tools			
123movies-			
official.site			
la123movies.org			
123moviesfree.love			
123ssgm.cc			
123kmmg.click			

123moviesonline.onl ine 123-db.xyz 123paidvideos.me 123moviesclub.cc 123-series9.online la123movies.live la123movies.com d123movies.to mkvking.me hdmoviearea.live hdmoviearea.club hdmoviearea.co.in 123moviesgo.ws 123moviesgo.cz 123moviesgo.vg 123moviesgo.la xxizone.com gowatchseries.online 123movies.tips 123moviesfree.vc 123moviesfree.app movies123.studio 123moviesd.com 123moviesgo.club hdpopcorns.wiki watchmovie.cc watchseries.net watchseries.pub			
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IN THE HIGH COURT OF DELHI AT NEW DELHI
(ORDINARY ORIGINAL COMMERCIAL JURISDICTION)

I.A. NO. _____ OF 2022

IN

CS(COMM) NO. 457 OF 2019

IN THE MATTER OF:

Warner Bros. Entertainment Inc. ...Plaintiff

Versus

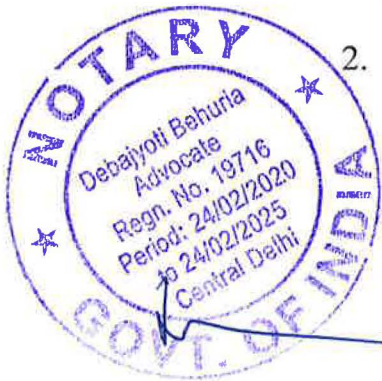
MOVIESFLIX .NET & Ors.Defendants

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

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

1. That I am the authorized signatory of the Plaintiffs and am duly authorized and competent to swear the present Affidavit.
2. That I have read the contents of the Application and the contents of the same, as well as the documents filed may be read as the part and parcel of the present affidavit, the same are not being reproduced herein for the sake of brevity.

DEPONENT



VERIFICATION:

08 DEC 2022

Verified at New Delhi on this _____ day of 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 THE DEPONENT
Sd./Smt./Kin... Vishal Ahuja
S/o, W/o R/o... Harish Ahuja
Identified by Sd./Smt. Meher Sidhu
Has solemnly affirmed before me at
Delhi on... as St. No. 252
That the contents of the affidavit which
have been read & explained to him/her
are true & correct to his/her knowledge

DEPONENT

08 DEC 2022

NOTARY

Meher Sidhu
I identified the deponent who
has signed in my presence.

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

I.A. NO. _____ OF 2022

IN

CS(COMM) NO. 457 OF 2019

IN THE MATTER OF:

Warner Bros. Entertainment Inc.	...Plaintiff
Versus	
MOVIESFLIX.NET & Ors.	..Defendants

AMENDED MEMO OF PARTIES

IN THE MATTER OF

Warner Bros. Entertainment Inc. 4000 Warner Boulevard, Burbank, California 91522, United States of America Email: antipiracy@warnerbros.com	...Plaintiff
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Versus

- 1)
 - moviesflix.net
 - moviesflixhub.com
 - moviesflixhub.net
 - hdmoviearea.com
 - dailydrivelink.me
 - dailydrivelink.net
 - dailydrivelink.in

Email: abuse@godaddy.com;
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psarips.org
psarips.com
psarips.in
psarips.net
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3)

world4ufree.store
world4ufree.best
world4ufree.com.co
world4ufree.cool
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4)

moviebaba.in
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5)

123movies.domains
123moviesback.org
123moviesback.com
123movies.gdn
123moviesla.com
123moviesz.pro
is123movies.site
123movies2019.com

123movieshq.org

123movies.st

123movies.la

123movie.uk

go123movies.io

gostream.site

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123movies.gdn@superprivacyservice.com;

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mkvcinemas.eu

mkvcinemas.pro

mkvcinemas.live

mkvcinemas.pw

mkvcinemas.com

mkvcinemas.cz

mkvcage.fun

mkvcage.com

mkvhub.com

mkvrips.com

480mkv.net

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- 10) watchseries.fm
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watch-series.live
watch-series.ru
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on.mywatchseries.stream
mywatchseries.stream
get.mywatchseries.stream
swatchseries.to
dwatchseries.to
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