BY EMAIL & DoT website

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

No. 813-07/LM-59/2024-DS-II **Dated:02-01-2025**

To,
All the Internet Service Licensees

Subject: CS(COMM) 1118 of 2024: Play Games24x7 Pvt Ltd v https://rummytu.in/ and Ors .before the High Court of Delhi

Kindly find enclosed the Hon'ble Delhi High Court order dated **13.12.2024** on the subject matter.

2. Please refer to the **para 36(vi)** of the said court order in respect of blocking of **websites** enumerated in the Memo of parties from Defendents **1 to 14**.

3. In view of the above, all the Internet Service Licensees are hereby instructed to take immediate necessary action for blocking of the said website, as above, for compliance of the said court order.

Digitally signed by
Shashi Kumar
Date: 02-01-2025 10:35:00
Director (DS-II)
Email: dirds2-dot@nic.in

Encl: A/A
Copy to:

i. Sh. V. Chinnasamy, Scientist E (chinnasamy.v@meity.gov.in), Electronics Niketan, Ministry of Electronics and Information Technology (MeitY) New Delhi for kind information and with request to take action as per **Annexure.**
ii. Sh. Deepak <dpk_goel@nic.in> Plaintiff Advocate for kind information.[Requested to take action as per Annexure]
iii. IT wing of DoT for uploading on DoT websites please.

$~40

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

\+ CS(COMM) 1118/2024, I.A. 48203/2024, I.A. 48204/2024, I.A. 48205/2024, I.A. 48206/2024, I.A. 48207/2024 & I.A. 48208/2024

PLAY GAMES24X7 PRIVATE LIMITED .....Plaintiff

Through: Ms. Mamta Rani Jha, Mr. Rohan Ahuja, Ms. Shruttima Ehersa and Ms. Diya Viswanath, Advs.
M: 9599510197
Email: diya@inttladvocare.com

versus

HTTPS RUMMYTU IN & ORS. .....Defendants

Through: Mr. Mrinal Ojha, Mr. Debarshi Dutta, Ms. Nikita Rathi, Mr. Rishabh Agarwal and Mr. Arjun Mookerjee, Advs.
M: 6302105061

CORAM:
HON'BLE MS. JUSTICE MINI PUSHKARNA

O R D E R

% **13.12.2024**

I.A. 48204/2024 (Application seeking leave to file additional documents)

1. This is an application under Order XI Rule 1(4) read with Section 151 CPC as amended by the Commercial Courts Act, 2015, seeking leave to file additional documents.

2. The plaintiff, if it wishes to file additional documents at a later stage, shall do so strictly as per the provisions of Commercial Courts Act, 2015 and the Delhi High Court (Original Side) Rules, 2018.

3. The application is disposed of, with the aforesaid directions.

I.A. 48205/2024 (Exemption from instituting Pre-Institution Mediation)

4. The present is an application under Section 12A of the Commercial Courts Act, 2015, read with Section 151 of CPC, seeking exemption from undergoing Pre-Institution Mediation.

5. Having regard to the facts of the present case and in the light of the judgment of Supreme Court in the case of ***Yamini Manohar Versus T.K.D. Keerthi, 2023 SCC OnLine SC 1382***, and Division Bench of this Court in ***Chandra Kishore Chaurasia Versus RA Perfumery Works Private Ltd., 2022 SCC OnLine Del 3529***, exemption from attempting Pre-Institution Mediation, is granted.

6. Accordingly, the application stands disposed of.

I.A. 48206/2024 (Exemption from advance service to the defendant nos. 1 to 14)

7. The present is an application under Rule 22 of Delhi High Court Intellectual Property Rights Division Rules, 2022 read with Section 151 CPC seeking exemption from advance service to the defendant nos. 1 to 14.

8. In view of the averments made in the application, the same is allowed and disposed of.

I.A. 48207/2024 (Exemption from advance service to the defendant nos. 21 & 22)

9. The present is an application under Section 80 (2) of CPC seeking exemption from serving notice under Section 80 (1) to the defendant nos. 21 to 22.

10. For the reasons stated in the application, the same is allowed and disposed of.

I.A. 48208/2024 (Application under Section 151 of CPC seeking exemption from physical service)

11. The present is an application under Section 151 of CPC seeking exemption from physical service to all defendants.

12. In view of the averments made in the present application, the same is allowed and disposed of.

CS(COMM) 1118/2024

13. Let the plaint be registered as suit.

14. Issue Summons. Summons is accepted by learned counsel appearing for defendant no.16.

15. Upon filing of the process fee, issue summons to the other defendants by all permissible modes. Summons shall state that the written statement be filed by the defendants within thirty days from the date of receipt of summons. Along with the written statement, the defendants shall also file affidavit of admission/denial of the plaintiff's documents, without which, the written statement shall not be taken on record.

16. Liberty is given to the plaintiff to file replication within thirty days from the date of receipt of the written statement. Further, 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 the documents, the same shall be sought and given within the timelines.

17. List before the Joint Registrar (Judicial) for marking of exhibits, on 06th February, 2025.

18. List before the Court on 06th May, 2025.

I.A. 48203/2024 (Application under Order XXXIX Rules 1 and 2 read with Section 151 CPC)

19. The present suit has been filed for permanent and mandatory injunction restraining infringement of copyright, infringement of trademark, passing off, fraud and misrepresentation, unfair competition, rendition of accounts and damages, etc.

20. It is submitted that the plaintiff, Play Games 24x7 Private Limited has approached this Court against the defendants, on account of blatant, deliberate infringement of its well-known registered trade mark RUMMYCIRCLE/ RummyCircle.com, copyright in the websites, literature, content, logo, promotional materials, passing off the plaintiff's goodwill and reputation and image rights of its brand ambassadors and celebrity endorsers.

21. Around November 2024, the plaintiff was shocked to find the impugned Infringing Rogue Domains/Websites/Webpages, wherein, the flagrant infringement is that some of the defendants are unlawfully using the names of the plaintiff Company's founders to lend a false air of legitimacy to their illegal conduct. These defendants are employing the *"Bait & Switch"* method to redirect unsuspecting users to their websites which offer betting/ gambling/ speculative games, which are unlawful in India. These websites provide a variety of gambling and betting games such as 777, Teen Patti, Fortune Gems, Jackpot Land, Slots, amongst many others. All these games are illegal and in complete contravention of the applicable laws.

Further, some of the defendants are exactly replicating the plaintiff's trademark RUMMYCIRCLE as part of their domain names. The others are exactly replicating the plaintiff's website, its look and feel, copyrighted information, and artworks therein, to promote their competing products on their domains. Unsuspecting users may use the defendants' platforms under the mistaken impression that the same is endorsed / affiliated with the plaintiff, which is not the case. In addition to the blatant infringement of the plaintiff's, its founders', and celebrity endorser's rights, the defendants' actions present a substantial risk of public harm and injury. The defendants' identities are deliberately unknown and no verifiable information Was found on the defendants.

22. It is submitted that the users upon entering the infringing websites are then automatically or on clicking "Download/ Register/ Sign Up" redirected to targeted websites (defendant nos. 2, 4 and 6). Upon clicking the link of defendant no. 1 website, the same redirects users to defendant no. 2's platform, which offers different versions of rummy games in addition to casino games. The defendant no. 3's website redirects to defendant no. 4's website that offers several illegal gambling and casino games like 777, slots, jackpot land, etc. Similarly, defendant no. 5's website redirects users to defendant no. 6's website that offers unlawful betting and casino games. The impugned websites promote gambling that is banned in the territory of India and creates an unlawful association amongst the public to the plaintiff, such that the average user may assume that such a website is an extension/ latest offering of the plaintiff's brand and that the plaintiff is indulging in illegal activities. This can cause serious damage to the plaintiff's hard-earned reputation and goodwill, not to mention the potential financial harm to the

general public at large.

23. It is submitted that the defendant nos. 7-11 are websites of third-party platforms which have used the plaintiff's registered trademarks by incorporating the same in the domain names and/or within the webpages hosted on such domain names, to mislead users into believing that the infringing websites are the plaintiff's or are linked /associated to the plaintiff. These impugned websites lure users by creating a false air of legitimacy by use and show an injurious association to the plaintiff's well-established brand and product and redirect them to their own websites offering unlawful betting and gambling games.

24. It is submitted that Websites, i.e., defendant nos.12 to 14 are exact replicas and have infringed on each element and aspect of the plaintiff's website from the homepage to the Terms and Conditions. The plaintiff has designed and developed their original website painstakingly and for valid consideration. The visual presentation and textual recitals as on the plaintiff's website, amount to original artistic and literary works under Section 2(c) and Section 2(o) of the Copyright Act, 1957. The rouge websites further falsely claim to be a rebranding of the plaintiff Company in their "About us" section and mislead the public. This not only infringes upon the plaintiff's rights but also constitutes the offences of cheating, fraud and impersonation under the Bhartiya Nyaya Sanhita, 2023.

25. It is submitted that the aforesaid Rogue infringing websites are not only illegal and constitute a blatant violation of the plaintiff's rights but are also causing widespread public harm and misrepresentation and propagation of illegal activities. The *mala fide* and illegal nature of the defendant nos. 1 to 14 is evident from the lack of any identifiable/ accurate physical

addresses, or even a legitimate entity operating them. The defendants operate only in the virtual world without leaving any evidence to trace the actual owner/ operator. Without clear verifiable details of the defendant' 5 operating entity or operations, the plaintiff suspects, that the alleged game being offered by the defendants is not legitimate and a clandestine means to cheat and dupe unsuspecting consumers of their hard-earned monies by unlawfully riding on the plaintiff's goodwill and reputation. Given the similarity of the modus operandi, it is evident that the Rogue Websites are working in collusion with each other to infringe the plaintiff's rights. The plaintiff also apprehends that there are many other such infringing websites operated by the defendants and others, which are hitherto unknown.

26. It is submitted that the plaintiff offers numerous variants to the traditional Rummy game, such as Points Rummy, Deals Rummy, Spin Rummy, and Pool Rummy which offer a platform for players to showcase and hone their Rummy skills. In addition to competitive gameplay, the plaintiff's RUMMYCIRCLE game /product also provides free tutorials, refreshers, and practice sessions for players to improve their skills. Users may download the plaintiff's mobile application under the trade mark RUMMYCIRCLE through the dedicated website, namely, www.rummycircle.com [registered on 03rd September, 2009] as well as mobile application marketplaces such as the Google Play and Apple App Store.

27. It is submitted that the plaintiff in order to strengthen its intellectual property rights over the brand RUMMYCIRCLE, has applied for and obtained several registrations for the said trade mark as well as the device

mark in India, under the Trade Marks Act, 1999.

28. It is submitted that apart from the trade mark registrations, the device mark/ logo also constitutes an original artistic work within the meaning of Section 2(c) of The Copyright Act, 1957 (hereinafter "the Act"). The plaintiff is the owner of copyright in the aforesaid device and any unauthorized use/ reproduction/ adaptation/ mutilation thereof, constitutes infringement of the plaintiff's exclusive rights under Section 51 of the Act.

29. It is submitted that the plaintiff's creatives / promotional material are uploaded on its social media accounts and YouTube pages and each of such posts has several million followers and visitors, leading to widespread and pervasive promotion of the same. The popularity of the plaintiff and its service/ game/ product under the trade mark RUMMYCIRCLE/ can also be gauged from the fact that it has a huge social media following across platforms, with millions of views and followers:

Social Media Platform	Followers/Likes/ Subscribers/Views
Facebook (https://www.facebook.com/RummyCircle/)	1.6 million followers 1.6 million likes
YouTube (www.youtube.com/@playgames24x7-RummyCircle)	597,000 Subscribers 238 videos 39,680,786 Views
Instagram (https://www.instagram.com/rummycircle/)	106,000 (106 k) followers 1258 posts
Telegram https://t.me/RummyCircleChannel	43 376 Subscribers

30. It is evident from the above, the defendants have unethically and unlawfully copied the Intellectual Property of the plaintiff. Such use and reproduction by the defendants is *mala fide*, without any due cause, and has been done with the sole intention to bait the users and mislead them into believing the impugned websites belong to the plaintiff and redirect them either onto an illegitimate competing Rummy Platform or onto an unlawful betting website banned by the Indian Government. The defendants have no plausible justification for such acts, apart from deriving undue benefits by giving a false impression of an association with the business of the plaintiff. The dishonesty and clandestine manner in which the defendants are operating is solely to divert the plaintiff's users to their own website, promoting unlawful betting and gambling. The acts of the defendants are solely motivated to deceive the public in believing that there is a nexus/approval between the impugned websites of defendants and the plaintiff in order to exploit the goodwill and reputation painstakingly earned by the plaintiff and reroute users to engage in illegal activities and expose them to potential fraud.

31. It is submitted that the plaintiff is the registered proprietor of the trade mark RUMMYCIRCLE/ much prior in point in time than the defendants. Along with the infringement of copyright, the defendants have also unlawfully used and reproduced the plaintiff's trade marks in the infringing websites as well as the domain names, and such unauthorized reproduction is being used for illicit purposes like promoting gambling /betting. The defendants could not have been ignorant of the plaintiff's

rights in the well-known trade mark RUMMYCIRCLE/  . Any person of average intelligence and imperfect recollection will not be able to differentiate between the services of the plaintiff and the services of the defendants on account of use of the plaintiff's trade mark in the webpage and as part of the domain and assume that the defendants" services/ game originates from or is endorsed by the plaintiff or are of the same quality as that of the plaintiff, which is not the case. Such unlawful use constitutes infringement of the plaintiff's well-known trade mark under Section 29 of the Trade Marks Act, 1999 and is in violation of the plaintiff's statutory right of exclusive use under Section 28 of the Trade Marks Act, 1999.

32. Considering that the plaintiff's trade mark RUMMYCIRCLE/  are "well known" trademarks, the use of identical mark by the defendants is without any due cause and justification and is solely motivated to misappropriate the reputation and goodwill of the plaintiff's trademarks and misuse the same to perpetrate illegal activities. There is no plausible justification or due cause whatsoever, behind the adoption of the impugned mark by the defendants. The adoption of the impugned mark by the defendants would be detrimental to the distinctive character and would cause irreparable loss and injury to the plaintiff on account of dilution and erosion of the distinctive character of the plaintiff's trademark.

33. On the other hand, Ms. Nikita Rathi, learned counsel appearing for defendant no.16/ GoDaddy LLC submits that the defendant no.16 can take

action for only locking and suspending of the domain names. She further points out that defendant no.13 is a sub-domain against which, the defendant no.16 cannot take any action. She however, submits that action can be taken by the defendant no.16, if direction is granted for taking action against the entire domain name.

34. Learned counsel appearing for defendant no.16 further submits that the effect of locking a website is that the party concerned is prevented from transfer of the said website/ domain name to any third party.

35. In view of the above circumstances, the plaintiff has demonstrated a *prima facie* case for grant of injunction and in case no *ex-parte ad-interim* injunction is granted, the plaintiff will suffer an irreparable loss. Further, the balance of convenience also lies in favour of the plaintiff and against the defendants.

36. Accordingly, till the next date of hearing, the following directions are issued:

i. Defendant nos. 1 to 14, their directors, assignees in business, licensees, franchisees and any persons claiming right through/for them, are restrained from using RUMMYCIRCLE/ or any other identical/ similar trademark / domain name/ logo, either as trademark/ trade name/ logo or as part of domain name, social media posts, creatives, in electronic or physical media or in any manner whatsoever, amounting to infringement of plaintiff's registered trademark; amounting to passing off the plaintiff's goodwill and reputation in its trade mark and/or the trade name/service and amounting to infringement of the plaintiff's copyright

therein.

ii. Defendant nos. 1 to 14, their directors, assignees in business, licensees, franchisees and any persons claiming right through/for them, are restrained from using the names of the plaintiff's founders on their websites, social media platforms, posts, in electronic or physical media or in any manner whatsoever.

iii. Defendant nos. 15 to 20, their directors, assignees in business, licensees, franchisees and any persons claiming right through/ for them, are directed to lock or suspend the infringing websites/ domain name/ webpage being defendant nos. 1 to 14, as available on their respective platforms.

iv. Defendant no.16 is directed to lock and suspend the entire domain of defendant no.13, i.e., **//fylingeagal.online/**.

v. Defendant nos. 15 to 20 are directed to disclose the Basic Subscriber Information and account registration details of defendant nos. 1 to 14, as may be available which may contain the trademark RUMMYCIRCLE/ RummyCircle.com or any mark deceptively similar thereto.

vi. Defendant nos. 21 and 22 are directed to block the infringing website/ domain name/ webpage of defendant nos. 1 to 14, as given in the Memo of Parties, which is attached as *Annexure-A*, to the present order.

37. It is further directed that the order passed today shall also be applicable to John Doe defendant no. 23.

38. As and when any other website/ domain name/ webpage is discovered by the plaintiff, liberty is granted to the plaintiff to file an affidavit to that effect, before the Joint Registrar (Judicial), who shall pass an appropriate

order extending the injunction order passed today, to the John Doe defendant no. 23.

39. Plaintiff is granted liberty to communicate to any intermediary platform, copy of the order passed today along with the URLs of any infringing domain/ website/ web pages of the defendants, which infringe the plaintiff's trademark, copyright. In case the intermediary platforms have any doubt regarding any domain/ website/ web page, the same shall be communicated to the plaintiff, who shall be at liberty to file an affidavit with respect thereto before the Joint Registrar (Judicial), for extending this order to the said domain/website/webpage.

40. Issue notice to the defendants. Notice is accepted by learned counsel appearing for defendant no.16.

41. Issue notice to the other defendants by all modes.

42. Let reply be filed within a period of four weeks.

43. Rejoinder thereto, if any, be filed within two weeks, thereafter.

44. Compliance of Order XXXIX Rule 3 CPC, be done, within a period of ten days, from today.

45. Re-notify on 06th May, 2025.

MINI PUSHKARNA, J

DECEMBER 13, 2024/kr

Annexure-A

IN THE HON'BLE HIGH COURT OF DELHI AT NEW DELHI
(ORDINARY ORIGINAL COMMERCIAL JURISDICTION)
CS (COMM) NO. 1118 OF 2024
CODE NO. 50000.01 & 50000

IN THE MATTER OF:

PLAY GAMES 24X7 PRIVATE LIMITED **...PLAINTIFF**

VERSUS

HTTPS://RUMMYTU.IN & ORS. **... DEFENDANTS**

MEMO OF PARTIES

Play Games24x7 Private Limited
Registered Office:
5th Floor, Central Wing (B)
Tower 4, Nesco IT Park,
Nesco Centre, Western Express Highway
Goregaon (East), Mumbai – 400 063 **... Plaintiff**

Versus

https://rummytu.in/
No details available **...Defendant No. 1**

https://rummybo.com/
Hari Niwas Building,
A-60 Basement, Defence Colony
South Delhi, Delhi- 110024
Email: rummybosvip@gmail.com **...Defendant No. 2**

https://rummy-circle-24x7-win-top-play.updates-info.com/
No details available **...Defendant No. 3**

https://www.teenpattionline.game/
No details available **...Defendant No. 4**

https://rummycircleapk.icu/
No details available **...Defendant No. 5**

https://usdtbet9.net/#/
No details available ...Defendant No. 6

https://rummy-circlerummy.com/
No details available ...Defendant No. 7

www.444rummycircle.com
No details available ...Defendant No. 8

https://www.rummycircletop.com/
P.O.Box 17640, Malad (W), Mumbai
Telephone: +916900600710
Email: contact@rummyCirclecash.com ...Defendant No. 9

https://www.rummycircleapp.com.in/
No details available ...Defendant No. 10

https://rummy-circle.in/
Plot No .120, Survey No. 41 Kavuri Hills,
G Begum Pet, Jubilee Hills Hyderabad TG- 500036 ...Defendant No. 11

https://ambarellabrandstech.com/
67, 68 Haiderpur Viran Centrum Plaza,
Golf Course Road, Gurgaon Sector 53, Basai Road
Gurugram- Haryana- 122001
Email: Pa71827@gmail.com ...Defendant No. 12

https://api.fylingeagal.online/
C/O Vedprakash, Nahla, Bhuna
Fatehbad, Haryana -125111
Email: Kitret12032@gmail.com _ ...Defendant No. 13

https://www.webtopiaservicestech.com/
Office No. 401, 4th Floor, Plot No-13,
Veer Sarvakar Block,
Agarawal Chamber, Shakarpur,
East Delhi, Delhi- 110092
Email: durgakumal221998@gmail.com _...Defendant No. 14

1 API GmbH
Kaiserstraße 172-174
66386 St. Ingbert, Germany
Phone: +49.6894.9396-760

Email: abuse@1api.net
legal@1api.net ...**Defendant No. 15**

GoDaddy.com, LLC
Address: 2155 E GoDaddy Way, Tempe, AZ 85284, USA
Email: abuse@godaddy.com, grievanceofficer@godaddy.com,
CourtDisputes@godaddy.com ...**Defendant No. 16**

Gname.com Pte. Ltd.
6 Battery Road, #29-02/03, Six Battery Road,
Singapore 049909.
Email: complaint@gname.com ...**Defendant No. 17**

Dynadot LLC
210 S Ellsworth Ave #345
San Mateo, CA 94401 US
Email: info@dynadot.com ...**Defendant No. 18**

TLD Registrar Solutions Ltd.
Saddlers House, 44 Gutter Ln,
London, EC2V 6BR
United Kingdom
Email: support@tldregistrarsolutions.com,
abuse@tldregistrarsolutions.com ...**Defendant No. 19**

W Domain.com
Flat/RM 1318-19 13F
Hollywood Plaza 610 Nathan Road
Mongkok KL Kwai Chung- 999077
Email: service@wdomain.com ...**Defendant No. 20**

Union of India
Through Ministry of Electronics and
Information Technology
Electronics Niketan, 6, CGO Complex,
Lodhi Road, New Delhi: 110003
Email: secretary@meity.gov.in
uoidhc@gmail.com ...**Defendant No. 21**

Department of Telecommunications
Ministry of Communications
Sanchar Bhawan 20, Ashoka Road,
New Delhi 110001
Email: secy-dot@nic.in

uoidhc@gmail.com ...Defendant No. 22

John Doe Rogue Websites ...Defendant No. 23

IN THE HON'BLE HIGH COURT OF DELHI AT NEW DELHI
(ORDINARY ORIGINAL COMMERCIAL JURISDICTION)
CS (COMM) NO. OF 2024
CODE NO. 50000.01 & 50000

IN THE MATTER OF:

PLAY GAMES 24X7 PRIVATE LIMITED ...PLAINTIFF

VERSUS

HTTPS://RUMMYTU.IN & ORS. ... DEFENDANTS

MEMO OF PARTIES

Play Games24x7 Private Limited
Registered Office:
5th Floor, Central Wing (B)
Tower 4, Nesco IT Park,
Nesco Centre, Western Express Highway
Goregaon (East), Mumbai – 400 063 **... Plaintiff**

Versus

https://rummytu.in/
No details available **...Defendant No. 1**

https://rummybo.com/
Hari Niwas Building,
A-60 Basement, Defence Colony
South Delhi, Delhi- 110024
Email: rummybosvip@gmail.com **...Defendant No. 2**

https://rummy-circle-24x7-win-top-play.updates-info.com/
No details available **...Defendant No. 3**

https://www.teenpattionline.game/
No details available **...Defendant No. 4**

https://rummycircleapk.icu/
No details available **...Defendant No. 5**

https://usdtbet9.net/#/
No details available **...Defendant No. 6**

https://rummy-circlerummy.com/
No details available **...Defendant No. 7**

www.444rummycircle.com
No details available **...Defendant No. 8**

https://www.rummycircletop.com/
P.O.Box 17640, Malad (W), Mumbai
Telephone: +916900600710
Email: contact@rummyCirclecash.com **...Defendant No. 9**

https://www.rummycircleapp.com.in/
No details available **...Defendant No. 10**

https://rummy-circle.in/
Plot No .120, Survey No. 41 Kavuri Hills,
G Begum Pet, Jubilee Hills Hyderabad TG- 500036 **...Defendant No. 11**

https://ambarellabrandstech.com/
67, 68 Haiderpur Viran Centrum Plaza,
Golf Course Road, Gurgaon Sector 53, Basai Road
Gurugram- Haryana- 122001
Email: Pa71827@gmail.com **...Defendant No. 12**

https://api.fylingeagal.online/
C/O Vedprakash, Nahla, Bhuna
Fatehbad, Haryana -125111
Email: Kitret12032@gmail.com **...Defendant No. 13**

https://www.webtopiaservicestech.com/
Office No. 401, 4th Floor, Plot No-13,
Veer Sarvakar Block,
Agarawal Chamber, Shakarpur,
East Delhi, Delhi- 110092
Email: durgakumal221998@gmail.com **...Defendant No. 14**

1 API GmbH
Kaiserstraße 172-174
66386 St. Ingbert, Germany
Phone: +49.6894.9396-760

Email: abuse@1api.net
legal@1api.net **...Defendant No. 15**

GoDaddy.com, LLC
Address: 2155 E GoDaddy Way, Tempe, AZ 85284, USA
Email: abuse@godaddy.com, grievanceofficer@godaddy.com,
CourtDisputes@godaddy.com **...Defendant No. 16**

Gname.com Pte. Ltd.
6 Battery Road, #29-02/03, Six Battery Road,
Singapore 049909.
Email: complaint@gname.com …**Defendant No. 17**

Dynadot LLC
210 S Ellsworth Ave #345
San Mateo, CA 94401 US
Email: info@dynadot.com **...Defendant No. 18**

TLD Registrar Solutions Ltd.
Saddlers House, 44 Gutter Ln,
London, EC2V 6BR
United Kingdom
Email: support@tldregistrarsolutions.com,
abuse@tldregistrarsolutions.com **...Defendant No. 19**

W Domain.com
Flat/RM 1318-19 13F
Hollywood Plaza 610 Nathan Road
Mongkok KL Kwai Chung- 999077
Email: service@wdomain.com **...Defendant No. 20**

Union of India
Through Ministry of Electronics and
Information Technology
Electronics Niketan, 6, CGO Complex,
Lodhi Road, New Delhi: 110003
Email: secretary@meity.gov.in
uoidhc@gmail.com **...Defendant No. 21**

Department of Telecommunications
Ministry of Communications
Sanchar Bhawan 20, Ashoka Road,
New Delhi 110001
Email: secy-dot@nic.in

uoidhc@gmail.com **...Defendant No. 22**

John Doe Rogue Websites **...Defendant No. 23**

Place: New Delhi
Date: 11.12.2024

Mamta Rani Jha
D/3007/1999
INTTL ADVOCARE
Counsel for the Plaintiff
B-36, Express Trade Tower
1st Floor, Tower-1,
Sector 132, Noida – 201 303
Mob. 95552 22902, 97179 35918
Email: mamta@inttladvocare.com

Defendant No. 1 to 22 are main contesting defendants

Annexure

Subject: Action requested to be taken by MEITY and Plantiff for effective removal of content for viewing by public at large within India as per the said orders of Hon'ble Court.

It is observed that a number of orders of Hon'ble Court are issued for blocking of websites every month. There are around more than 2700 ISPs in India and these ISPs are connected among themselves in a mesh network. DOT is instructing each of the ISPs through emails/through its website for blocking of the websites as ordered by the Hon'ble Courts. Ensuring compliance of the orders by each of the ISPs is a time-consuming and complex task especially in view of multiplicity of orders of Hon'ble Courts, multiplicity of websites to be blocked and multiplicity of ISPs.

2. Allocation of Business Rules inter-alia sates thus:-

'Policy matters relating to information technology; Electronics; and Internet (all matters other than licensing of Internet Service Provider)'.

3. In view of above and in order to ensure effective removal by content for viewing by public at large, the plantiff is requested to do a trace route of the web server hosting the said website. In case the web server happens to be in India, the plantiff may inform the same to Meity who may direct the owner of such web server to stop transmission of content as per IT Act and as directed by the Hon'ble Court so that the content would be blocked from the source itself and the exercise of blocking by 2700 ISPs would not be required.

4. In case such server is located abroad i.e. outside India then access to such URL/website can be blocked through the international internet gateways which are much less in number. This would result in timely and effectively removal of undesirable content for viewing by public at large as is the requirement as per the orders of Hon'ble Court.