813-7/25/2024-DS-Part(1) I/3244401/2025

BY EMAIL & DoT website

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

No. 813-07/LM-07/2024-DS-II

Dated:23-01-2025

To,

All the Internet Service Licensees

Subject: Unblocking in C.S. (COMM) No. 117 of 2025 [Universal City Studios LLC & Ors. v. fzkidd.net & Ors. Before Hon'ble Delhi High Court

Kindly find enclosed the Hon'ble Delhi High Court order dated **17.01.2024** on the subject matter.

- 2. Please refer to **para 11** of the application in respect of unblocking of websites enumerated in the memo of parties of Def 75.
- 3. In view of the above, all the Internet Service licensees are hereby instructed to take immediate necessary action for unblocking of the said websites, as above, for compliance with the said court order.

Digitally signed by Shashi Kumar

Date: 23-01-2025 18:40:33

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. Ms. Mehr Sidhu (mehr@saikrishnaassociates.com) Plaintiff Advocate for kind information. [Requested to take action as per Annexure]
- iii. IT wing of DoT for uploading on DoT websites please.





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* IN THE HIGH COURT OF DELHI AT NEW DELHI

+ CS(COMM) 117/2024 UNIVERSAL CITY STUDIOS LLC & ORSPlaintiff

Through: Ms. Suhasini Raina, Ms. Mehr

Sidhu, Ms. Priyanka Jaiswal,

Advocates

versus

FZKIDD.NET & ORS.

....Defendant

Through: None

CORAM: JOINT REGISTRAR (JUDICIAL) Dr. AJAY GULATI

> ORDER 17.01.2025

%

I.A. No. 1281/2025 on behalf of the plaintiffs seeking deletion of defendant no. 75 from the array of parties.

- **1.** For the reasons mentioned in the application and the averments made in *para* 10 of the application, the application is allowed in terms of the prayer clause i.e. *para* 11.
- **2.** IA stands disposed off accordingly.

Dr. AJAY GULATI (DHJS), JOINT REGISTRAR (JUDICIAL)

JANUARY 17, 2025/sk

Click here to check corrigendum, if any

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

I.A. ____ OF 2025 IN

CS(COMM) NO. 117 OF 2024

IN THE MATTER OF

Universal City Studios LLC and Ors. ...Plaintiffs

Versus

fzkidd.net & Ors. ...Defendants

JURISDICTION VALUE: Rs.12,00,01,200/-INDEX

S. NO.	PARTICULARS	PAGE NO.
1.	Notice of Motion	1
2.	Urgent Application along with court fees	2-3
3.	3. Application on behalf of the Plaintiffs	
	under Order I Rule 10 of the Code of	
	Civil Procedure, 1908 seeking deletion	
	of Defendant No.75 from the array of	
	parties.	
4.	Amended memo of parties	13 – 22
5.	Copy of the Order dated 07.02.2024 in	23 - 35
	CS (COMM) 117/2024.	
6.	Copy of the Order dated 04.12.2024 in	36 - 37
	CS (COMM) 117/2024.	
7.	Service Affidavit along with Proof of	38 –
	Service	

Place: New Delhi

Date: 16th January 2025

PH/ 2695/2021
Mehr Sidhu (PH/2695

Mehr Sidhu (PH/2695/2021) Advocates for the Plaintiffs 57, Jor Bagh, Delhi – 110003 +91 8879106222

mehr@saikrishnaassociates.com

NOTE:

The present application is being filed in a website blocking suit.

All the 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 a supporting affidavit of Plaintiff's counsel is filed herewith.

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

The application is to be listed before the Ld. Joint Registrar as per Para 13 of the ex-parte ad interim order dated 07.02.2024.

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

I.A. OF 2025

IN

CS(COMM) NO. 117 OF 2024

IN THE MATTER OF

Universal City Studios LLC and Ors.

...Plaintiffs

Versus

fzkidd.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 17th January, 2025 or any date thereafter. Please take note accordingly.

Place: New Delhi

Date: 16th January 2025

PH/ 2695/2021 Mehr Sidhu (PH/2695/2021) Advocates for the Plaintiffs 57, Jor Bagh, Delhi – 110003

+91 8879106222

mehr@saikrishnaassociates.com

IN THE HIGH COURT OF DELHI AT NEW DELHI

((ORDINARY	ORIGINAL	COMMERCIAI	L JURISDI	(CTION
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I.A. NO._____ OF 2025

IN

CS (COMM) NO. 117 OF 2024

To,

The Deputy Registrar,

High Court of Delhi,

New Delhi

IN THE MATTER OF:

Universal City Studios LLC and Ors.

...Plaintiffs

Versus

fzkidd.net & Ors.

...Defendants

Sir,

Kindly treat the accompanying application as urgent in accordance with the Delhi High Court Rules, 2018.

The grounds of urgency are:

That the present application has been filed under Order I Rule 10 of the Code of Civil Procedure, 1908, for deletion of Defendant No. 75 from the array of parties. The present application requires urgent orders of this Hon'ble Court and it may be listed before the Ld. Joint Registrar tentatively on 17th January 2025.

As prayed

Yours faithfully,

Place: New Delhi

Date: 16th January 2025

Weidher PH/2695/2021

Mehr Sidhu (PH/2695/2021) Advocates for the Plaintiffs 57, Jor Bagh, Delhi – 110003 +91 8879106222

mehr@saikrishnaassociates.com





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

I.A. ____ OF 2025

IN

CS(COMM) NO. 117 OF 2024

IN THE MATTER OF

Universal City Studios LLC and Ors.

...Plaintiffs

Versus

fzkidd.net& Ors.

...Defendants

APPLICATION ON BEHALF OF THE PLAINTIFFS UNDER ORDER I RULE 10 OF THE CODE OF CIVIL PROCEDURE, 1908 SEEKING DELETION OF DEFENDANT NO.75 FROM THE ARRAY OF PARTIES

MOST RESPECTFULLY SHEWETH:

1. Plaintiffs have filed the instant suit seeking a permanent injunction against infringement of its copyright in its cinematograph films being works of visual recording which include sound recordings accompanying such visual recordings of its exclusive rights enumerated under Section 14(d) of the Copyright Act, 1957. Plaintiffs crave leave to refer to and rely upon the plaint and impleadment application being I.A. No. 47127/2024, 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 deletion of Defendant No. 75, "tamilyogi.wiki" which was impleaded *vide* order dated 04.12.2024 ("Impleadment Order") in I.A. No. 47127/2024.
- 3. It is submitted that in the present suit, this Hon'ble Court was pleased to pass an *Ex-Parte* Injunction Order on 07.02.2024 ("Exparte Injunction") against the Defendant Nos. 1-28 ("Defendant Websites"). Further, the Internet Service Providers ("ISPs") (Defendant Nos. 29-37), Department of Telecommunications-("DOT") (Defendant No. 38) and Ministry of Electronics and Information Technology- ("MEITY") (Defendant No. 39), were directed to take appropriate actions for blocking access to Defendant Websites. Furthermore the respective Domain Name Registrars ("DNRs") of the Defendant Websites were directed to lock and suspend the domain names. For the sake of convenience, the relevant portion of the Ex-parte Injunction is extracted herein below:
 - 13.1. The rogue websites Defendants No. 1 to 28 (as enlisted in Annexure A to this order) are restrained from, in any manner, streaming, reproducing, distributing, making available to the public and/or communicating to the public any copyrighted content of the Plaintiffs including future works of the Plaintiffs, in which ownership of copyright is undisputed, through their websites identified in the present suit or any mirror/ redirect websites or alphanumeric websites, or any variations thereof including those websites which are associated with the Defendants' websites, either based on the name, branding, identity of its operator, or discovered to provide additional means of accessing the Defendants' websites, and other domains/domain along with their sub-domains and sub-directories, owners, website operators/entities or even sources of content.
 - 13.2. The Plaintiffs are directed to file an application under Order I Rule 10 of the Code of Civil Procedure,1908 ["CPC"] for impleadment of domains that are found to be mirror/redirect websites or alphanumeric websites, or any variations thereof

including those websites which are associated with the Defendants' websites either based on the name, branding, identity of its operator, or discovered to provide additional means of accessing the Defendant's website and are discovered to have been engaging in infringing the Plaintiffs' exclusive rights, with sufficient supporting evidence. Such applications shall be listed before the Joint Registrar, who, on being satisfied with the material placed on record, shall issue the appropriate directions to the ISPs and the Defendants No. 38 and 39 — Department of Telecommunications and Ministry of Electronics and Information Technology.

13.3. Defendants No. 29-37/ ISPs shall give effect to this injunction by blocking Defendants No. 1 to 28, as noted in Annexure A. Defendants No. 38 and 39 shall issue blocking orders against the websites within a period of one week from the release of the order. 13.4. The respective Domain Name Registrars of Defendants No. 1 to 28, upon being intimated by the Plaintiffs, shall lock and suspend the said domain names. In addition, any details relating to the registrants of the said domain names including KYC, credit card, mobile number, etc. be also provided to the Plaintiffs.

A copy of the Ex-parte Injunction is filed along with this Application.

- 4. Additionally, *vide* paragraph 13.2 of the Ex-parte Injunction, the Hon'ble Court has allowed Plaintiffs to implead additional hydraheaded / pirate brand websites which are mirror / redirect / alphanumeric websites of the already injuncted Defendant Websites.
- 5. In light of the above the Plaintiffs filed an application under Order I Rule 10 of Code of Civil Procedure,1908 along with evidence, i.e. I.A.47127/2024, for impleading additional mirror/redirect/alphanumeric variations of the Defendant Websites as Defendant Nos. 66 to 83 on 30.11.2024. As evidenced, Defendant Nos. 66 to 83 were engaged in the business of hosting, streaming, retransmitting, making available for viewing and downloading, providing access to, and communicating to the public, Plaintiffs'

films through the medium of internet without authorization from the Plaintiffs.

6. The I.A. 47127/2024 was listed before the Ld. Joint Registrar on 04.12.2024. The Ld. Joint Registrar allowed the said application and extended the directions passed in paragraph no. 13 the Ex-parte Injunction *qua* the newly impleaded Defendants including Defendant No. 75, thereby blocking access to Defendant No.75. The relevant portion of the impleadment order is extracted below:

"..... The plaintiff is seeking to implead additional rogue websites as defendant nos. 66 to 83 because they have been found to be indulging in illegally disseminating the copyrighted material belonging to the plaintiff. The application is supported by the required affidavit. Keeping in view the contents of the suit and the application, the same is allowed. The proposed defendants are impleaded as defendant nos. 66 to 83. Issue summons to the newly impleaded defendants.

--XX-XX-XX--

The order blocking the rogue-websites passed by the Hon'ble Court on 07.02.2024 shall operate qua the freshly impleaded defendants as well, in terms of directions contained in para 13 of the order dated 07.02.2024."

- 7. The Plaintiffs upon receiving the copy of the Impleadment Order shared the Impleadment Order with the defendants, including ISPs, DOT, MEITY and the respective DNRs of Defendant Nos.66 to 83 requesting them to comply with the directions of this Hon'ble Court *vide* email dated 16.12.2024.
- 8. Subsequently, Defendant No.75 contacted the Plaintiffs via email about their inclusion in this action. Plaintiffs through their counsel, issued a holding response on 14.01.2025. Defendant No. 75 then issued another response to the Plaintiffs holding response on

14.01.2025, requesting to be deleted from the array of parties. In response to Defendants response dated 15.01.2025, Plaintiffs in good faith and bonafide are praying for deletion of Defendant No. 75 from the array of parties. A copy of the email correspondences between Plaintiffs and Defendants is attached herewith.

- 9. Thus, in light of the above, Defendant No.75 may be deleted from the array of parties on basis of Defendant No.75's email.
- 10. The present application has been filed without prejudice to the rights of the Plaintiffs. Plaintiffs reserves its rights to implead Defendant No.75 or initiate contempt proceedings against Defendant No. 75 and/or take any other legal rights, if it is found to be engaging in the business of hosting, streaming, retransmitting, making available for viewing and downloading, providing access to, and communicating to the public, Plaintiffs' films through the medium of internet and mobile transmission without authorization from the Plaintiffs.

PRAYER:

- 11. In view of the above, Plaintiffs humbly pray that this Hon'ble Court may be pleased to:
 - a. Delete Defendant No.75 from the array of parties;
 - b. Pass an order directing the Defendant Nos. 29 to 37 to provide access and unblock Defendant No.75 as listed in Schedule A;

- c. Pass an order directing the Defendants Nos. 38 to 39, to issue a notification calling upon the various internet and telecom service providers registered under it to provide access and unblock Defendant No.75 as listed in Schedule A;
- d. Pass an order directing the DNR of Defendant No.75, Namecheap Inc. to lift the lock and suspension of Defendant No.75;
- e. Take the amended Memo of Parties on record; and
- f. 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.

Mr Vishal Ahuja

Authorised Signatory of the Plaintiffs

Place: New Delhi

Date: 16th Jan uary, 2025

PH/2695/2021

Mehr Sidhu (PH/2695/2021) Advocates for the Plaintiffs 57, Jor Bagh, Delhi – 110003 +91 8879106222

mehr@saikrishnaassociates.com

SCHEDULE-A

URL of Defendant No.75	Domain Name of Defendant	IP Address of	
	No.75	Defendant No.75	
https://tamilyogi.wiki	tamilyogi.wiki	172.67.133.253	
		104.21.25.100	
		No.75	

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

I.A NO._____ OF 2024

IN

CS(COMM) NO. 117 OF 2024

IN THE MATTER OF

Universal City Studio LLC. & Ors.

...Plaintiffs

Versus

fzkidd.net & Ors

...Defendants

AMENDED MEMO OF PARTIES

- 1. Universal City Studios LLC.
 Having its Office at
 100 Universal City Plaza, Universal City,
 CA 91608, United States of America,
 Email: antipiracy@nbcuni.com
- 2. Warner Bros. Entertainment Inc. having its office at 4000 Warner Boulevard, Burbank, California 91522, United States of America Email: antipiracy@warnerbros.com
- 3. Columbia Pictures Industries, Inc. having its office at 10202 W. Washington Blvd., Culver City, CA 90232-3195 United States of America, Email: copyrightagent@sp.sony.com
- 4. Netflix Studios, LLC having its office at 100 Winchester Cir Los Gatos

CA, 95032-I8I5, United States of America, Email: <u>legal@netflix.com</u>

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

6. Disney Enterprises, Inc.
having its office at 500 S. Buena Vista,
Burbank, CA, 9I521, United States of
America,

Email: tips@disneyantipiracy.com

....Plaintiffs

Versus

1. Fzkidd.net

Email: <u>abuse@internet.bs</u>
3ad790bfE5350496fi219ac36fa087d823b2e
5886704be944
00e996a3b57dcc@fzkidd.net.whoisproxy.or
g

- 2. ofilmyzilla.com.ms
 ofilmyzilla.com.ve
 ofilmyzilla.it
 Email:ofilmyzilla.com@gmail.com;
 abuse@Iapi.net
 itregistry@instra.com
 dasroy260@gamil.com
 support@cloudflare.com
- 3. tamilyogi.plus tamilyogi.love tamilyogi.band Email : domainabuse@tucows.com
- 4. soap2day.tel

Email: compliance@tucows.com

5. myflixer.la flixer.ph

myflixer.ph

Email: abuse@centralriic.com

6. sflix.watch sflixz.to

Email: abuse@namecheap.com

bflixwatch@gmail.com

7. moviesmod.dev moviesmod.wiki moviesmod.one

Email: <u>abuse@namecheap.com</u>

abuse@godaddy.com

8. freemovies 360.cc

Email: abuse@sarek.fi

9. streamm4u.com streamm4u.to

Email: abuse@namesilo.com

10. desicinemas.ink

Email: abuse@dynadot.com

11. epxmovies.net

Email: <u>info@example.com</u> <u>abuse@namecheap.com</u>

12. movi.pk

Email: support@cloudflare.com

13. 123moviesfree.mx

Email: support@cloudflare.com

14. filmygallery.baby

filmygallery.app

filmygallery.cab

filmygallery.club

filmygallery.foo

filmygallery.lol

filmygallery.pro

Email: Abuseporkbun.com

15. zorox.to

zoro.vc

Email: abuse@namecheap.com

16. flixwave.to

Email: suppmi@cloudflare.com

17. upmovies.to

Email: support@cloudflare.com

18. mydownloadhubtube.net

Email: services@innovahosting.net

19. movie-web.app

Email: dmca@movieweb.app

20. moviekhhd.biz

Email: abuse@godaddy.com

21. movieshd.watch

Email: domainabuse@tucows.com

22. goflixtor.com

Email: abuse@namecheap.com

23. cinehub.wtf

Email: abuse@porkbun.com

24. arc018.to

Email: support@cloudflare.com

25. flixerplus.com

Email: abuse@dynadot.com

26. netmovies.to

Email: support@cloudflare.com

27. aniwatch.to

Email: support@cloudflare.com

28. toonstream.in

Email: <u>toonstream786@gmail.com</u> abuse@hostinger.com

29. Atria Convergence Technologies Pvt. Ltd.99A/113A, Manorayana PalyaR.T. Nagar Bangalore- 560032

Also At:

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

30. Bharat Sanchar Nigam Ltd.
Bharat Sanchar Bhawan, Regulation Cell
5th floor, Harish Chandra Mathur Lane
Janpath, New Delhi -110001
Email: sbkhare@.bsnl.co.in;
sushmamishra71@gmail.com

31. Bharti Airtel Ltd.
Airtel Centre, Tower-A, 6th floor
'A' Wing, Plot No.16, Udyog Vihar
Ph- IV, Gurgaon- 122016
Email: 121@in.airtel.com;
compliance.officer@bharti.in
amit.bhatia@airtel.com

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

33. Mahanagar Telephone Nigam Ltd.
5th Floor, Mahanagar Doorsanchar Sadan
9, CGO Complex, Lodhi Road
New Delhi - 110003
Email: raco.mtnl@gmail.com;
mtnlcsco@gmail.com

34. Reliance Jio Infocomm Limited RCP 14 (TC 23), Phase 4,
B-Block, 3rd Floor,
C4 130 Twane-belapur Road,
Gansoli,
Navi Mumbai - 400701
Email: care@jio.com;
Hitesh.marthak@relianceada.com;
Kapoor.guliani@ril.com;
mahipal.singh@ril.com;
sunil.kr.gupta@ril.com;
shilpi.kant@ril.com; jyoti.jain@ril.com;
rudraksha.sinha@ril.com

35. Shyam Spectra Pvt. Ltd.Plot No. 258,Okhla Industrial Estate, Phase III,New Delhi- 110020

Also at:

Plot No. 21-22, 3rd Floor Udyog Vihar, Phase IV, Gurugram -122015 Email: <u>info@spectra.co</u>; <u>compliance@spectra.co</u>

36. Tata Teleservices Ltd.19 Floor, Berger Tower,Delhi One Complex, Sector 16 (B)Noida UP -201301

Also at:

A E & F Blocks, Voltas Premises, T B Kadam Marg, Kala Chowki, Mumbai – 400033 (Chinchpokli)

Email:

satya.yadav@tatatel.co.in; gaganjit.sidhu@tatatel.co.in rishabh.aditya@tatatel.co.in

37. Vodafone India Limited Vodafone House,

Penninsula Corporate Park,
Ganpatrao Kadam Marg,
Lower Parel, Mumbai – 400013
Vodafone House,
Peninsula Corporate Park,
Ganpatrao Kadam Marg,
Lower Parel, Mumbai – 400 013 India,

Also At:

Birla Centurion, 10th Floor, Plot No. 794, B Wing, Pandurang Budhkar Marg, Worli, Mumbai – 400 030 India

Eamil

<u>arun.madhav@vodafoneidea.com</u> <u>sanjeet.sarkar@vodafoneidea.com</u> <u>lavati.sairam@vodafoneidea.com</u>

Depa11ment of Telecommunications
 Through Secretary,
 Ministry of Communications and IT,
 20, Sanchar Bhawan, Ashoka Road,
 New Delhi- 110001

Email:

secy-dot@nic.in, dird2-dot@nic.in

39. Ministry of Electronics and Information Technology Through the Director General (DIT) Cyber Laws & e-security), Electronics Niketan, 6, CGO Complex, Lodi Road, New Delhi- 110003

Email:

cyberlaw-legal@meity.gov.in

- 40. Ashok Kumars
- 41. aniwatchtv.to

Email: <u>support@cloudflare.com</u>

42. zoroxtv.to

Email: support@cloudflare.com

43. filmyzilla.com.ng

Email: <u>filmyzilla.com@mail.ru</u>, <u>filmyzilla.com@proton.me</u>

44. filmyzilla.com.ve

Email: suppm1@cloudflare.com

45. tamilyogi.red

Email: domainabuse@tucows.com

46. tamilvip.live

Email: domainabuse@tucows.com

47. sflix.se

Email: support@cloudflare.com

48. streamm4u.ws

Email: abuse@namesilo.com

49. zoro.se

Email: support@cloudflare.com

50. zoroto.tv

Email: abuse@namecheap.com

51. toonstream.net

Email: domainabuse@tucows.com

52. ofilmyzilla.org.bz

Email:ofilmyzilla.com@gmail.com

53. ofilmyzilla.com.hn

Email:registry_admin@instra.com, dasroy260@gmail.com

54. ofilmyzilla.com.ht

Email:staff@eurodns.com,

guptasonam0254@gmail.com

- 55. sflixtv.to
 Email:legal@cloudflare.com,
 abuse@cloudflare.com
- 56. moviesmod.space Email:abuse@godaddy.com
- 57. moviesmod.fun
 Email: abuse@godaddy.com
- 58. moviesmod.lol Email:abuse@namecheap.com
- 59. stream4u.net Email:abuse@dynadot.com
- 60. streamm4u.tv Email:compliance@tucows.com
- 61. zoroxtv.to
 Email: legal@cloudflare.com,
 abuse@cloudflare.com
- 62. zorotv.co.in
 Email: legal@cloudflare.com,
 abuse@cloudflare.com
- 63. zoroto.live Email:abuse@dynadot.com
- 64. upmovies.net Email:abuse@name.com
- 65. aniwatchtv.to
 Email: legal@cloudflare.com,
 abuse@cloudflare.com,
 domains@marcaria.com
- 66. filmyzilla.com.nl Email: filmyzilla.my@proton.me,

staff@eurodns.com, domains@marcaria.com

67. filmyzilla.com.ni Email: legal@cloudflare.com, abuse@cloudflare.com, filmyzilla2024@proton.me

68. filmyzilla.com.nf Email: legal@cloudflare.com, abuse@cloudflare.com

69. filmyzilla.vg
Email: abuse@tldregistrarsolutions.com

70. filmyzilla.com.cy Email: legal@cloudflare.com, abuse@cloudflare.com

71. filmyzilla.com.br Email: legal@cloudflare.com, abuse@cloudflare.com

72. filmyzilla.com.vu Email:abuse@pacificnetworks.net, vudomains@instrac.com

73. tamilyogi.sc Email: abuse@netim.net

74. tamilyogi.blog Email:domainabuse@tucows.com

75. tamilyogi.wiki Email:abuse@namecheap.com

76. tamilyogi.se Email: legal@cloudflare.com, abuse@cloudflare.com

77. zorotv.link

Email: abuse@namecheap.com

78. zorox.se

Email: legal@cloudflare.com, abuse@cloudflare.com

- 79. tv.zoro.se Email:legal@cloudflare.com, abuse@cloudflare.com
- 80. zoroxx.to
 Email::legal@cloudflare.com,
 abuse@cloudflare.com
- 81. zorotv.info
 Email: abuse@godaddy.com
- 82. flixwave.watch Email: abuse@namecheap.com
- 83. flix-wave.lol Email: abuse@namecheap.com

...Defendants

Place: New Delhi

Date:29th November, 2024

Mehr Sidhu (PH/2695/2021)

Advocates for the Plaintiffs 57,

Jor Bagh, Delhi – 110003

+91 8879106222

Msidhu

mehr@saikrishnaassociates.com

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.