

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-08/2024-DS-II

Dated: 21-02-2025

To,
All the Internet Service Licensees

S u b j e c t : CS(COMM) 125 of 2025: RELIANCE RETAIL LTD Vs. YOUSAFRANCHISE.NET & ORS. before the High Court of Delhi.

Kindly find enclosed the Hon'ble Delhi High Court order dated 14.02.2025 on the subject matter.

2. Please refer to **Para 59 X(III) and X(XIV) of the said Court order** in respect of blocking of websites [10 nos] enumerated in **Document A of the Court order**.

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

Encl: AA

Digitally signed by

SHASHI KUMAR

Date: 21-02-2025

15:43:18

Director (DS-II)

Email: dirds2-dot@nic.in

Copy to:

- i. DG(Telecom), DoT, New Delhi: Requested to arrange for blocking of the Mobile number [4 nos] detailed in Document B of said Court order.
- ii. 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 requested for taking action as per Annexure.
- iii. Mr. Manas Raghuvanshi< manas@saikrishnaassociates.com> Plaintiff Advocate for kind information.[Requested to take action as per Annexure].
- iv. IT wing of DoT for uploading this order on DoT websites please.



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

+ **CS(COMM) 125/2025 & I.A. Nos. 3880-3886/2025**

RELIANCE RETAIL LTD

.....Plaintiff

Through: Mr. Sidharth Chopra, Mr. Yatinder Garg, Ms. Disha Sharma, Mr. Akshay Maloo, Mr. Manas Raghuvanshi, Ms. Reeva Gujral Sinha, Ms. Taarika Pillai, Ms. Shagun Sehrawat, Advocates (M:)

versus

YOUSTAFRANCHISE.NET & ORS.

.....Defendants

Through: Mr. Neel Mason, Ms. Ekta Sharma, Ms. Pragya Jain, Ms. Surabhi Katare, Advocates for D-4 (M:9425172896) Ms. Nidhi Raman, CGSC with Mr. Akash Mishra, Advocates for D-16 & 17 (M:9910113783)

CORAM:

HON'BLE MS. JUSTICE MINI PUSHKARNA

ORDER

% **14.02.2025**

I.A. 3882/2025 (Exemption from filing original and certified copies of documents)

1. The present is an application under Section 151 of the Code of Civil Procedure, 1908 ("CPC"), on behalf of the plaintiff, seeking exemption from filing original/translated documents/certified copies/clearer copies/documents with proper margins/legal proceeding certificates and to file certain dim documents.
2. Exemption is granted, subject to all just exceptions.

CS(COMM) 125/2025

Page 1 of 25



3. Plaintiff shall file legible, clear, and translated copies of the documents, on which the plaintiff may seek to place reliance, before the next date of hearing.

4. Accordingly, the present application is disposed of.

I.A. 3886/2025 (Exemption from undergoing Pre-Institution Mediation)

5. 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.

6. Having regard to the facts of the present case and in the light of the judgments 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.

7. Accordingly, the application stands disposed of.

I.A. 3883/2025 (Exemption from advance service to the defendant nos. 11, 16 and 17)

8. The present is an application under Section 80 CPC, read with Section 151 CPC, seeking exemption from advance service to the defendant nos. 11, i.e., National Internet Exchange of India ('NIXI'), defendant no. 16, i.e., Department of Telecommunications ('DOT') and defendant no. 17, i.e., Ministry of Electronics and Information Technology ('MEITY').

9. Learned counsel puts in appearance on behalf of defendant nos. 16 and 17.

10. Noting the aforesaid, the present application is disposed of.



I.A. 3885/2025 (Exemption from advance service to the defendant nos. 1 and 18)

11. The present is an application under Section 151 CPC, seeking exemption from advance service to the defendant nos. 1 and 18.

12. The plaintiff seeks urgent interim relief. Therefore, in the peculiar facts and circumstances of this case, exemption from effecting advance service upon the said defendants is granted.

13. Accordingly, for the reasons stated in the application, the same is allowed and disposed of in terms, thereof.

I.A. 3884/2025 (Application seeking leave to file additional documents)

14. 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.

15. 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.

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

I.A. No. 3881/2025 (Application seeking directions to the Intelligence Fusion and Strategic Operations/Cyber Cell, Special Cell, Delhi Police)

17. The present application has been filed under Section 151 CPC seeking directions to the Intelligence Fusion & Strategic Operations/Cyber Cell, Special Cell, Delhi Police.

18. The instant suit has been filed for permanent injunction restraining the illegal and unauthorized adoption and use of the plaintiff's trademarks, i.e.,

‘RELIANCE’, , ‘YOUSTA’, , by defendant nos.



1 and 18, for the purpose of deceiving and/or duping members of the public and trade/by representing themselves to be associated/ affiliated with the plaintiff as an agent, dealer, distributor, etc.

19. It is the case of the plaintiff that the rogue defendants, defendant nos. 1 and 18 together with other unknown perpetrators are indulged in illegal and fraudulent activities and the defendant no.1 along with other unknown defendants i.e., Ashok Kumar(s) / defendant no. 18 herein are misusing the plaintiff's registered marks and operating online through websites and social media platforms ("Fraudulent Pages") in order to deceive unsuspecting members of the public by dishonestly portraying themselves to be agents of the plaintiff and misrepresenting themselves to be affiliated with the plaintiff's brand 'YOUSTA'.

20. It is further submitted that the rogue defendants have perpetrated a calculated fraud on the members of the public by luring such members into applying to become franchisees of the plaintiff, whereas, no such franchises are actually extended by the plaintiff through the rogue defendants, and in the entire process, the rogue defendants infringe upon the plaintiff's

registered trademarks "YOUSTA" and "yousta". Thus, it is submitted that the rogue defendants are operating fake enterprises through the fraudulent pages, in order to falsely induce and gain trust of such unsuspecting customers, by way of using the information of the plaintiff, i.e., the brand

'YOUSTA' and registered trademarks "YOUSTA" and "yousta".

21. It is submitted that the rogue defendants have been seeking personal information from innocent consumers, including, but not limited to, mobile numbers, email addresses, current business and minimum amount of



investment that the consumers intend to invest, and once such information is furnished by the unsuspecting member of the public, the rogue defendants contact them to extort monies through misrepresentations and dishonest inducements.

22. It is submitted that from the evidence collected and based on the information displayed on the fraudulent pages of the rogue defendants, i.e. plaintiff's registered mark, 'YOUSTA' and the actual email and corporate address of the plaintiff, it can be reasonably culled out that the *modus operandi* of the rogue defendants is to, *inter alia*, deceive the innocent members of the public into believing that the rogue defendants are representatives of the plaintiff.

23. It is submitted that the plaintiff has an apprehension that the details of the mobile numbers used by the rogue defendants, as available with the defendant nos. 14 and 15, may be incorrect. Further, the correct identity of the rogue defendants can be ascertained by investigating the IP addresses, mobile numbers, websites, domain names, etc., being used by the perpetrators to dupe the general members of the public.

24. Thus, it is imperative that this Court directs the Intelligence Fusion and Strategic Operations/Cyber Cell, Special Cell, Delhi Police to investigate, and obtain relevant information about the rogue defendants and place the same, before this Court.

25. Attention of this Court has been drawn to the order dated 23rd December, 2024, in *CS (COMM) 475/2022*, passed by this Court, where, in similar circumstances, directions were issued by this Court for investigation and filing Status Report.

26. Considering the submission made before this Court, the Intelligence



Fusion and Strategic Operations/Special Cell, New Delhi, Delhi Police (Cyber Cell), is directed to investigate and identify the exact details of defendant nos. 1 and 18, operating through mobile numbers, websites, social media platforms and the websites, details of which are given in *Documents A to G* attached to the present order.

27. Let a thorough investigation be carried out and a Status Report be filed by the Delhi Police (Cyber Cell), in this regard.

28. The plaintiff is at liberty to give any other documents or information to the Cyber Cell of the Delhi Police, as and when any new documents or information comes to the notice of the plaintiff.

29. The present order is directed to be delivered to the Standing Counsel, Delhi Police, Criminal, for compliance and necessary action.

30. With the aforesaid directions, the present application is disposed of.

CS(COMM) 125/2025

31. Let the plaint be registered as suit.

32. Issue summons. Summons is accepted by learned counsel for defendant nos. 4, 16 and 17.

33. This court notes the statement of learned counsel for defendant no. 4 that no written statement is required to be filed on behalf of defendant nos. 4, 16 and 17, as there are no reliefs against them, except compliance to be done in terms of directions issued by this Court.

34. Issue summons to other defendants, upon filing of Process Fees, 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.

35. 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.



36. List before the Joint Registrar (Judicial) for marking of exhibits, on 16th April, 2025.

37. List before the Court on 19th May, 2025.

I.A. 3880/2025 (Application under Order XXXIX Rules 1 and 2 CPC)

38. The present suit has been filed for permanent injunction restraining infringement of trademark rights, passing off, unfair trade practices, dilution, delivery up, etc.

39. It is submitted that the plaintiff has filed the present suit against the illegal and unauthorised adoption and illegal use of the plaintiff's registered


trademarks "RELIANCE", "", "YOUSTA", "" by the defendant nos. 1 and 18 for the purpose of deceiving the members of the public by representing themselves to be associated / affiliated with the plaintiff as agencies to offer franchise opportunities of the plaintiff's brand 'YOUSTA'.


40. It is submitted that the plaintiff is engaged in the retail sales of, *inter alia*, groceries, bakery and dairy products, home and personal care products, general merchandise items, beauty and cosmetic products, fashion and



lifestyle products, consumer electronics and home appliances for the past two and a half decades. In order to perpetuate its business, the plaintiff, *inter alia*, owns, operates and manages a nationwide network of retail outlets, convenience stores, supermarkets, specialty and online stores under various brands / trademarks.

41. It is submitted that the plaintiff launched its indigenous and dynamic youth-centric fashion brand 'YOUSTA' in August 2023. The plaintiff sought to carve its niche with the brand "YOUSTA" that would resonate with the youth, offering them the latest trends of clothing at affordable prices. The plaintiff's brand 'YOUSTA' offers a diverse portfolio of consumer products including, but not limited to, apparel, footwear and accessories. The plaintiff is also expanding its product portfolio to include cosmetics and accessories in the future.


42. It is submitted that the plaintiff applied for the registration of the trademarks "YOUSTA" and "" under various classes, including Classes 3, 14, 18, 21, 24, 25 and 35, during the months of March and April

2023. The trademarks "YOUSTA" and "" under the aforementioned classes stand registered in the name of the plaintiff.


43. It is submitted that the brand 'YOUSTA', enjoys substantial goodwill and reputation in the market. Introduced in August 2023 as a youth-centric brand, 'YOUSTA' quickly gained recognition for providing high quality, affordable products, tailored specifically for Indian consumers' needs. Apart from housing unisex merchandise, character merchandise and a weekly refresh capsule, 'YOUSTA' drops brand new looks in its 'Starring Now'




collection every week, where the latest fashion is offered as a complete outfit with matching accessories. The extensive promotional campaigns across various media, including print, radio, and television, along with on-ground activations, have further solidified the brand's market presence.

Thus, the use of the marks "YOUSTA" and "" has become intrinsically associated with Reliance's promise of quality and indigenous excellence, making any unauthorized use or infringement detrimental to its established reputation and goodwill.

44. It is submitted that the goodwill and reputation of the mark 'YOUSTA' is further demonstrated by its impressive inaugural sales of approximately INR 114,33,00,000/- in its debut year i.e., August 2023 to August 2024. It is submitted that the trademarks "YOUSTA" and

 "are inherently distinctive. Thus, the plaintiff has established valuable common law rights in the trademarks "YOUSTA" and

 "concerning its apparel, footwear, cosmetics and accessories and the said trademarks have become synonymous with the plaintiff.

45. It is submitted that the defendant no. 1, in collusion with other unknown perpetrators, is engaged in illegal and fraudulent activities by misusing the plaintiff's well-known trademarks and trade name – 'YOUSTA' and 'Reliance Retail Limited'. Defendant no. 1 is operating its fraudulent business through the creation of deceptive websites, fake offer letters, fabricated agreements, social media accounts/posts, YouTube videos, and WhatsApp accounts, all unlawfully bearing the plaintiff's trademarks,



trade name, company details, and employee information. While the plaintiff is yet to ascertain the exact identities of these rogue defendants, it has reason to believe that all websites, social media accounts identified in the suit are operated under defendant no. 1, are interconnected and follow a common modus operandi to defraud the general public.

46. It is submitted that on 11th December, 2024, the plaintiff was informed by a victim, Mr. Ratheesh R from Cochin, Kerala, that an individual named Mr. Varun Singh Rathore had impersonated an employee of the plaintiff, falsely claiming to be the Director, Sales & Marketing. By doing so, the perpetrator dishonestly induced the victim to part with INR 2,65,000/-.

47. It is submitted that the perpetrator(s)/rogue defendants, operating under the plaintiff's infringing domain name - info@youstaco.com, induced the victim to transfer the funds. A fraudulent payment receipt was subsequently issued in confirmation of the transaction. However, after receiving the funds, Mr. Varun Singh Rathore became unreachable, prompting the victim to approach the plaintiff for redressal. Screenshots of the forged approval letter, letter of intent, both dated 10th December, 2024, and the fraudulent payment receipt have been filed in the plaint.

48. It is submitted that a similar fraudulent incident was reported by another victim, Mr. Rachit Agarwal from Surat, Gujarat. Under identical circumstances, the perpetrators/rogue defendants, led by Mr. Varun Singh Rathore, issued fake, forged, and fabricated documents, including a letter of intent and confirmation and payment letter, both dated 03rd January, 2025. These documents bore plaintiff's trademark and falsely stated that the victim's franchise application had been accepted and instructed him to



complete the registration process for the plaintiff's brand "YOUSTA" by making a payment of INR 1,73,400/- to a bank account under the name 'Reliance Retail Limited'. In this case, the perpetrators/rogue defendants used the email address franchise@reliance-yousta.in to communicate with the victim and induce the payment.

49. It is submitted that as the plaintiff continued its investigations into the fraudulent schemes, another victim reached out on 1^{4th} January, 2025, regarding an email received from info@relianceyousta.in about the franchise process for "YOUSTA". The six-page email outlined fake franchise acquisition procedures, including process steps, associated costs, required documentation, and other specifications. It was fraudulently sent under the name of Mr. Pankaj Dubey, a legitimate employee of the plaintiff, who has never issued such an email to the victim. This incident highlights how the perpetrators/rogue defendants have been impersonating the plaintiff's employees to further their fraudulent scheme. The complete email dated 14th January, 2025, as forwarded by the victim, has also been submitted along with this plaint.

50. It is submitted that on 30th January, 2025, the plaintiff received an alarming complaint from its authorized franchise partner, Franchise India. The complaint revealed that a fraudulent alternative Yousta Business Model brochure was being circulated. This brochure misrepresented the franchise model, including investment requirements, rental property guidelines, and overall business modalities, thereby misleading potential investors. Furthermore, the plaintiff has received multiple complaints from customers and well-wishers about fraudulent franchise offers being promoted on various online platforms.



51. It is submitted that the perpetrators have also established fake social media profiles on Facebook, LinkedIn, YouTube, and other platforms, as well as WhatsApp accounts and fake email domains, all of which fraudulently use the plaintiff's trademarks, branding, corporate identity, and employee details to gain the trust of unsuspecting individuals.

52. It is submitted that from an analysis of the websites and the Facebook accounts operated and managed by the rogue defendants, it is apparent that these rogue defendants have dishonestly and unauthorizedly used the plaintiff's YOUSTA family of marks on their respective websites and/or Facebook account to imply and suggest an association with the plaintiff in order to mislead the members of the public into believing that the plaintiff is providing franchises of the brand 'YOUSTA' through them and, thereby, defraud such unsuspecting members of the public for the purpose of deriving wrongful gains.


53. It is submitted that it is also apprehended by the plaintiff that the defendant nos. 1 and 18 are also interlinked with each other and share a common motive to defraud the general members of the society. This is further evident as the Whatsapp Account of one of the infringing unknown entities, under defendant no.18, has shown fake and fraudulent association with more than one brand belonging to the plaintiff. While the plaintiff found it to be a fraudulent entity promoting a YOUSTA franchise through its Whatsapp Account, at a later stage this same entity's Whatsapp page was fraudulently promoting the plaintiff's famous "CAMPA COLA" franchise. Pertinently, the plaintiff had recently filed the case *CS(COMM) 1185 of 2024, Reliance Retail Limited v. Rilbusiness.in & Ors.*, against fake and fraudulent entities that were illegally offering and promoting franchises/





distributorship of its “CAMPA COLA” brand. This Court had granted an *ex-parte ad-interim* injunction restraining such entities from promoting these fake franchises and further directed the proforma defendants impleaded therein to assist the plaintiff with compliance of the order. The plaintiff therefore apprehends that the defendant nos. 1 and 18 as well as the defendants in the plaintiff’s “CAMPA COLA” suit are all interconnected and are conducting the same infringing/fraudulent/unlawful/deceitful activities in relation to different brands of the plaintiff.

54. It is submitted that through the fraudulent pages that bear the plaintiff’s registered marks, images of the plaintiff’s store of the brand ‘YOUSTA’ and the email addresses and corporate addresses actually used by the plaintiff, the rogue defendants induce the members of the public to provide information through the false/fake application forms for the franchise of the ‘YOUSTA’ upon the payment of monies in the garb of investments.

55. It is submitted that the Rogue Defendants have not been authorised to use the plaintiff’s registered marks, including, *inter alia*, “RELIANCE”,

“YOUSTA” and “”. Thus, any such use by the rogue defendants amounts to infringement of the exclusive rights owned by the plaintiff within the purview of the provisions of the Trademarks Act, 1999.

56. It is submitted that rogue defendants, by virtue of using identical trademarks / logos, including, *inter alia*, “RELIANCE”, “RELIANCE

RETAIL”, “”, “YOUSTA”, “” and the variants thereof





have passed off and infringed the plaintiff's rights in terms of Section 29 of the Trademarks Act 1999.

57. It is submitted that the rogue defendants' use of the said trademarks / logos is bound to cause confusion in the minds of a person with average intelligence and imperfect recollection. It is submitted that an average consumer is bound to be misled into believing that the rogue defendants are in some manner associated / connected / affiliated with the plaintiff herein.

58. In 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, balance of convenience also lies in favour of the plaintiff, and against the defendants.

59. Accordingly, till the next date of hearing, the following directions are passed:

I. Defendant nos. 1 and 18 by themselves, their owners, proprietors, partners, servants, employees, directors and all others in capacity of principal or agent acting for and on behalf of, or anyone claiming through, by or under it, are restrained from using the plaintiff's registered trademarks

"RELIANCE", , "YOUSTA",  and/or any deceptive variants thereof which is identical and/or similar to the plaintiff's aforesaid trademarks, in any manner, thereby, amounting to infringement of the plaintiff's registered trademarks/ amounting to passing off the plaintiff's trademarks/ or in any manner amounting to misappropriation, dilution and tarnishment, of the plaintiff's trademarks.

II. Defendant No. 2 is directed to block / suspend the Facebook accounts



identified at *Document C* attached with the present order, and to further disclose the contact and other details of the account holder such as name, e-mail address, phone number, etc.

III. Defendant No. 3 is directed to block/suspend LinkedIn accounts identified at *Document D* attached with the present order, and to further disclose the contact and other details of the account holder such as name, e-mail address, phone number, etc.

IV. Defendant no. 1 is directed to remove the URL as per *Document E* of the present order within 24 hours. In case, the said defendant does not take appropriate action, defendant no. 4 is directed to suspend the URL as identified in *Document E* attached with the present order, in accordance with law.

V. Defendant no. 4 is further directed to disclose the contact and other details of the account holder, such as name, e-mail address, phone number, etc., to the extent available.

VI. Defendant No. 5 is directed to block/suspend the WhatsApp accounts of the mobile numbers identified at *Document F* attached with the present order, and to further disclose their Basic Subscriber Information (BSI) reports.

VII. Defendant Nos. 6 to 10, are directed to suspend and block the access to the rogue websites/domain names associated with defendant no. 1, as identified in *Document A*, attached with the present order.

VIII. Defendant No. 11 is directed to issue a notification calling upon the various Domain Name Registrars holding '.in' domains to suspend and block the access to the rogue websites/ domain names associated with defendant no. 1 as identified in *Document A*, attached with the present order.



IX. Defendant Nos. 12 and 13 are directed to suspend bank accounts associated with defendant nos. 1 and 18, as identified at *Document G*, attached with the present order, and to disclose the identity of the aforementioned bank account holder, KYC documents, identity related documents and bank statements from the date of opening of the account till date, on affidavit.

X. Defendant Nos. 14 and 15 are directed to block access to the various mobile numbers identified by the plaintiff at *Document B*, attached with the present order.

XI. Defendant Nos. 14 and 15 are directed to disclose the relevant KYC details of the numbers identified at *Document B*, attached with the present order.

XII. Defendant Nos. 14 and 15 are directed to block access to the Rogue defendants' websites identified at *Document A*, attached with the present order.

XIII. Defendant Nos. 16 and 17 are directed to issue a notification calling upon the various internet and telecom service providers registered under it to block access to the various websites of the rogue defendants identified at *Document A*, attached with the present order.

XIV. Defendant Nos. 16 and 17 are directed to block access to the various mobile numbers identified by the plaintiff in the instant suit, identified at *Document B*, attached with the present order.

60. The aforesaid actions shall be taken by the defendants within a period of ten days from today.

61. Liberty is granted to the plaintiff to file an affidavit with respect to such individual/entities, which are discovered during the course of



proceedings, who have been engaging in infringement of plaintiff's intellectual property rights, or anyone claiming under them.

62. It is directed that today's order shall be extended to such persons, websites, telephone numbers, as and when an affidavit in this regard is filed by the plaintiff, which shall be listed before the Joint Registrar (Judicial).

63. Upon satisfaction of learned Joint Registrar (Judicial), today's order shall be extended to such persons, domains, websites, telephone numbers, who are engaged in similar infringing activities.

64. Issue notice to the defendants. Notice is accepted by learned counsels appearing for defendant nos. 4, 16 and 17.

65. Issue notice to the other defendants by all permissible modes upon filing of the Process Fee, returnable on the next date of hearing.

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

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

68. Compliance of Order XXXIX Rule 3 CPC, be done, within a period of one week.

69. List before the Court on 19th May, 2025.

MINI PUSHKARNA, J

FEBRUARY 14, 2025

au



DOCUMENT A

(List of infringing Domain Names and Rogue Websites of the Defendant No. 1)

S. N.	Domain Names / Websites	Domain Name Registrar	Page no. (Screenshots)
1.	https://youstaco.com	HOSTINGER Operations, UAB / National Internet Exchange of India	21
2.	www.reliance-yousta.in	Name SRS AB	40
3.	https://youstafranchise.net	GoDaddy.com, LLC	64-75
4.	https://youstafranchiseltd.co.in	Endurance Digital Domain Technology Private Limited / National Internet Exchange of India	79-85
5.	https://relianceyousta.store/index.html	HOSTINGER Operations, UAB	90-113
6.	https://relianceyostafranchise.com/	GoDaddy.com, LLC	116-127
7.	https://in.franchisegoal.com/yousta-franchise-	Realtime Register B.V.	131-148



	alternatives-cost-profit/#how-to-get-yousta-franchise		
8.	https://youstafranchise.co.in/	GoDaddy.com, LLC / National Internet Exchange of India	153-166
9.	https://youstafranchise.online/	HOSTINGER Operations, UAB	171-191
10.	https://garments-shop-mp4ng82njbvfgb1e.builder-preview.com/	HOSTINGER Operations, UAB	194-199



DOCUMENT B

(List of mobile numbers corresponding to and/or associated with and/or used by the Defendant No. 1)

S. N.	Mobile Numbers / Mobile Numbers associated with WhatsApp accounts	ISP / TSP	Page No. (Screenshot)
1.	+91 – 9934379601	Airtel	238-239
2.	+91 – 9526500086	Vodafone-Idea	240
3.	+91 – 9038985850	Airtel	10,24
4.	+91 – 9748999671	Airtel	30, 52-53



DOCUMENT C

(List of infringing pages / handles / profiles corresponding to the Defendant
Nos. 1 and 18 on Facebook)

S. N.	Domain Name	Social Media Platform	Page No. (Screenshot)
1.	https://www.facebook.com/profile.php?id=61569761879969	Facebook	204-211
2.	https://www.facebook.com/profile.php?id=61571304676284	Facebook	212-219
3.	https://www.facebook.com/share/p/1Gwb0NswWR/	Facebook	220
4.	https://www.facebook.com/share/p/166NjHLtjR/	Facebook	221
5.	https://www.facebook.com/share/p/15UuYjSy2w/	Facebook	222
6.	https://www.facebook.com/profile.php?id=61571583632510	Facebook	223-229



DOCUMENT D

(List of infringing pages / handles / profiles corresponding to the Defendant
Nos. 1 and 18 on LinkedIn)

S. N.	Domain Name	Social Media Platform	Page No. (Screenshot)
1.	https://www.linkedin.com/company/yousta-fashion/posts/	LinkedIn	230-237



DOCUMENT E

(List of infringing channels / pages / videos available and accessible on YouTube and corresponding to the Defendant Nos. 1 and 18)

S. N.	DOMAIN NAME	Page No. (Screenshot)
1.	https://www.youtube.com/watch?v=BbPqgoFtGEO	240-241



DOCUMENT F

(List of mobile numbers corresponding to the WhatsApp accounts of the Defendant Nos. 1 and 18)

S. N.	Mobile Numbers / Mobile Numbers associated with WhatsApp accounts	ISP / TSP	Page No. (Screenshot)
1.	+91 – 9934379601	Airtel	238-239
2.	+91 – 9748999671	Airtel	53



DOCUMENT G

(List of Bank Accounts associated with and/or operated by the Defendant No. 1)

S. N.	Name of the Bank Account Holder	Account Number	IFSC Code	Bank Name	Branch Name	Page No. (Screen-shot)
1.	Reliance Retail Venture Limited	60511398707	MAHB0002470	Bank of Maharashtra	Tilak Nagar, Mumbai	19
2.	Reliance Retail Ventures Limited	286501000008887	IOBA0000625	Indian Overseas Bank	Nariman Point, Mumbai	51

Code 50000

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

C.S. (COMM.) _____ OF 2025

IN THE MATTER OF:

Reliance Retail Limited

...Plaintiff

Versus<https://youstafranchise.net> & Ors.

...Defendants

MEMO OF PARTIES

Reliance Retail Limited

3rd Floor, Court House,

Lokmanya Tilak Marg, Dhobi Talao,ss

Mumbai, Maharashtra – 400002

E-mail: retail.ip@zmail.ril.com

Mobile No.: 7827227168

Also, at: 601, Prakashdeep RWA,

Tolstoy Marg, New Delhi – 110001

E-mail: retail.ip@zmail.ril.com

Mobile No.: 7827227168

...Plaintiff

Versus

1. <https://youstafranchise.net>
<https://youstafranchiseltd.co.in>
<https://relianceyousta.store/index.html>



<https://relianceyostafranchise.com/>

<https://in.franchisegoal.com/yousta-franchise-alternatives-cost-profit/#how-to-get-yousta-franchise>

<https://youstafranchise.co.in/>

<https://youstafranchise.online/>

<https://garments-shop-mp4ng82njbfgbl.e.builder-preview.com/>

<https://www.reliance-yousta.in>

<https://www.youstaco.com/>

Email Addresses: info@reliance-yousta.in;
Info@youstafranchiseltd.co.in; info@relianceyousta.store;
care@relianceyostafranchise.com;
admin@franchisegoal.com; info@youstafranchise.co.in;
info@youstafranchise.online;
fashionhub@yousthashop.online

Mobile Nos.: +91 – 9934379601; 9526500086;
 9038985850; 9748999671; 9846391818; 8238602654

2. Meta Platforms Inc.
 Unit 28 and 29
 The Executive Centre,
 Level 18, DLF Cyber City, Building No. 5,
 Tower A, Phase III, Gurgaon – 122002
 Through Its Grievance Officer for India
 Email Address(es): fbgoindia@support.facebook.com

3. LinkedIn Corporation
 Legal Department

1000 West Maude Avenue
Sunnyvale, CA 94085
USA

Also, at:

LinkedIn Technology Information Pvt. Ltd.
Tower A, Global Technology Park
Bangalore, Karnataka – 560103

Email Address(es): sks2@linkedin.com,

4. Google LLC

India Liason Office

Unit No. 26, The Executive Centre

Level 8, DLF Centre

Sansad Marg, Connaught Place

Delhi – 110001

Email Address(es): support-in@google.com;

legal+1amgvze4getxn2g@support.youtube.com

5. WhatsApp LLC

1 Meta Way, Menlo Park,

California 94025, USA

Email Address(es):

grievance_officer_wa@support.whatsapp.com

Also, at:

Whatsapp LLC,

Unit B8 and B10,

The Executive City Center,



Level 18, DLF Cyber City, Building No.5,
Tower A, Phase- 3, Gurugram, Haryana – 122002

6. GoDaddy.com, LLC
4th Floor, Statesman House, Barakhamba Road
Connaught Place, New Delhi,
Central Delhi, Delhi – 110001
Email Address(es): grievanceofficer@godaddy.com,
abuse@godaddy.com

7. Endurance Digital Domain Technology Private Limited
HD 016, Wework Building, 4 NESC,
Western Exp Highway, Goregaon East,
Mumbai, Maharashtra – 400063
Email Address(es): [abuse-
contact@publicdomainregistry.com](mailto:abuse-contact@publicdomainregistry.com),
abuse@publicdomainregistry.com

8. Hostinger operations, UAB
Hostinger, UAB. Jonavos str. 60C, 44192
Email Address(es): support@hostinger.com

9. Realtime Registrar B.V.
Burgemeester Drijbersingel 51
8021 JB Zwolle, Netherlands
Phone: +31 38 453 0759
Email Address(es): abuse@realtimeregister.com

10. Name SRS AB
Email Address: abuse@namesrs.com



11. National Internet Exchange of India
B-901, 9th Floor, Tower B,
World Trade Centre, Nauroji Nagar,
New Delhi – 110029
Email Address(es): info@nixi.in

12. Bank of Maharashtra
Guru Milan Co-Op Hsg Society Building, Dombivli,
Beside Regency Family Restaurant, Tilak Nagar, Thane,
Maharashtra – 421201
E-mail: hocomplaints@mahabank.co.in;
cmcustomerservice@mahabank.co.in

13. Indian Overseas Bank
762/763, IOB, Anna Salai,
Chennai, Tamil Nadu-600002
E-mail: cybercell@iob.in

14. Bharti Airtel Ltd.
Airtel Centre, Tower-A, 6th floor
'A' Wing, Plot No.16, Udyog Vihar
Ph- IV, Gurgaon -122016
Email ID: amit.bhatia@airtel.com

15. Vodafone Idea Limited
Vodafone House,
Peninsula Corporate Park,
Ganpatrao Kadam Marg,
Lower Parel, Mumbai - 400 013 India



Also, at:

Birla Centurion,

10th Floor, Plot no.794,

B Wing, Pandurang Budhkar Marg,

Worli, Mumbai - 400 030 India

E-mail: smitha.menon@vodafoneidea.com;

pankaj.kapdeo@vodafoneidea.com

radhika.gokhale@vodafoneidea.com

sheena.thukral@vodafoneidea.com;

lavati.sairam@vodafoneidea.com

16. Department of Telecommunications
Ministry of Communications and IT,
20, Sanchar Bhawan, Ashoka Road, New Delhi-110001
Through its Secretary,
E-mail: secy-dot@nic.in, dirids2-dot@nic.in,
uoidhc@gmail.com, abhinesh.meena@gov.in

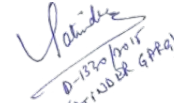
17. Ministry of Electronics and Information Technology
Electronics Niketan, 6 - CGO Complex,
Lodhi Road, New Delhi-110003
Through the Director General (DIT) Cyber Laws
E-mail: cyberlaw@meity.gov.in;
gccyberlaws@meity.gov.in; pkumar@meity.gov.in;
uoidhc@gmail.com

18. Ashok Kumar (s)
(All those individuals, websites and platforms imitating
Plaintiff's marks, logos, and corporate name (*inter alia*,

identified in Document C, D, E and F hereto)

...Defendants

Place: New Delhi
Date: 11th February 2025



Yatinder Garg
(D/1330/2015)
Saikrishna and Associates
Counsels for the Plaintiff
57, Jor Bagh, New Delhi – 110003
+91-9999064036
yatinder@saikrishnaassociates.com

Note: Defendant No.1 and 18 are the main contesting parties.



Annexure

Subject: Action requested to be taken by MEITY and Plaintiff 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 states 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 plaintiff 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 plaintiff 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.