813-7/25/2024-DS 1/3235563/2024

**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-18/2022-DS-II

Dated:23-12-2024

To.

**All Internet Service Licensees** 

Subject: CS (Comm) No. 265 of 2022; Universal City Studios LLC & Ors. Vs. Vegamovies.run & Ors Before Hon'ble Delhi High Court.

Kindly find enclosed the Hon'ble Delhi High Court order dated 03.12.2024 on the subject matter.

- Please refer to para 22 & 24 of the Court Order dated 27.04.2022 in respect of blocking of websites enumerated in the memo of parties from Defendant 206 to 266.
- 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 with the said court order.

Digitally signed by Shashi Kumar

Date: 23-12-2024 09:49:43

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. Smt. Mehr Sidhu, (mehr@saikrishnaassociates.com) Lawyer/Advocate for the plaintiff for kind information. [Requested to take action as per Annexure]
- iii. IT wing, DoT for uploading on DoT Website please.





\$~19

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

+ CS(COMM) 265/2022

UNIVERSAL CITY STUDIOS LLC & ORS. .....Plaintiff

Through: Ms. Priyanka Jaiswal, Ms. Mehr

Sidhu, Mr. Raghav Goyal,

Advocates

versus

VEGAMOVIES.RUN & ORS.

....Defendant

Through: None

CORAM: JOINT REGISTRAR (JUDICIAL) Dr. AJAY GULATI

> ORDER 03 12 2024

**%** 

IA. No. 47035/2024 on behalf of plaintiff's under Order I Rule 10 CPC seeking impleadment of additional mirrors, redirects, or alphanumeric variations as defendant nos. 206 to 266.

- 1. The plaintiff is seeking to implead additional rogue-websites as defendant nos. 206 to 266 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 of the Investigator. Keeping in view the contents of the suit and the application, the same is allowed. The proposed defendants are impleaded as defendant nos. 206 to 266.
- 2. The amended memo filed alongwith this IA is taken on record. Steps be taken on filing of PF to serve through the electronic mode only, the newly impleaded defendants within a week.
- 3. The order blocking the rogue-websites passed by the Hon'ble Court on 27.04.2022 shall operate qua the freshly





impleaded defendants as well, in terms of directions contained in **para 21 to 24** of the said order. Accordingly, defendant ISP's shall give effect to the injunction by blocking defendant nos. 206 to 266. Further concerned defendants i.e. Department of Telecommunications and Ministry of Electronics and Information Technology shall issue blocking orders against defendant nos. 206 to 266 within a period of one week. IA is allowed and disposed off accordingly.

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

**DECEMBER 3, 2024**/sk

Click here to check corrigendum, if any

File The Order 7 is 200 warded the monet DHO Serve Pah) 06/12/2024 at 15:27:51

\$~38

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

+ CS(COMM) 265/2022

UNIVERSAL CITY STUDIOS LLC & ORS. ..... Plaintiffs

Through: Mr. Saikrishna Rajagopal, Mr. Sidharth Chopra, Ms. Suhasini Raina, Ms. Disha Sharma, Ms. Surabhi Pande and Mr. Sanidhya Rao, Advocates.

versus

VEGAMOVIES.RUN & ORS.

..... Defendants

Through:

**CORAM:** 

HON'BLE MS. JUSTICE JYOTI SINGH

ORDER 27.04.2022

%

#### I.A. 6388/2022(exemption)

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

#### **I.A. 6390/2022**(exemption from pre-suit mediation)

- 3. For the reasons stated in the application, the requirement of preinstitution mediation is dispensed with.
- 4. Application is allowed and disposed of.

#### I.A. 6389/2022(exemption from serving advance notice)

- 5. Since there is an urgency in the matter and the matter is being heard today, Plaintiffs are exempted from serving advance notice on Defendant No.22/Department of Telecommunications (DoT) and Defendant No.23/Ministry of Electronics and Information Technology (MEITY).
- 6. For the reasons stated in the application, the same is allowed and disposed of.



CS(COMM) 265/2022

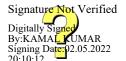
Page 1 of 8

#### **CS(COMM) 265/2022**

- 7. Let plaint be registered as a suit.
- 8. Upon filing of process fee, issue summons to the Defendants, through all permissible modes, returnable on 03.08.2022. Summons shall state that the written statement shall be filed by the Defendants within 30 days from the receipt of summons. Along with the written statement, Defendants shall also file an affidavit of admission/denial of the documents of the Plaintiffs.
- 9. Replication be filed by the Plaintiffs within 15 days of the receipt of the written statement. Along with the replication, an affidavit of admission/denial of documents filed by the Defendants, shall be filed by the Plaintiffs.
- 10. If any of the parties wish to seek inspection of any documents, the same shall be sought and given within the timelines.
- 11. List before the Joint Registrar on 03.08.2022.
- 12. List before the Court on 31.08.2022.

#### I.A. 6387/2022(under Order 39 Rules 1 and 2 CPC, by Plaintiffs)

- 13. Issue notice to the Defendants through all prescribed modes, returnable on 31.08.2022.
- 14. Present application has been preferred by the Plaintiffs under Order 39 Rules 1 and 2 read with Section 151 of the Code of Civil Procedure 1908 for grant of *ex-parte ad-interim* injunction.
- 15. It is averred that Plaintiffs No. 1 to 6 are amongst the leading global entertainment companies engaged in the business of creation, production and distribution of motion pictures/cinematograph films, having exclusive rights to communicate their content. Plaintiffs' films being works of visual recording, which include sound recordings accompanying such visual



CS(COMM) 265/2022 Page 2 of 8

recordings, qualify as a "cinematograph film" under Section 2(f) of The Copyright Act, 1957 (hereinafter referred to as 'the Act'). Any hosting, streaming, reproducing, distributing, making available to the public, and/or communicating to the public of the Original Content, or facilitating the same, without authorisation of the Plaintiffs, by any means on any platform including internet and mobile and/or any other medium would be illegal and amount to violation of the Plaintiffs' copyright, protected under the Act.

16. Defendants No. 1 to 12 include vegamovies.run, with the additional domains vegamovies.app, vegamovies.bar, vegamovies.cx, vegamovies.info, vegamovies.ink, vegamovies.nl and vegamovies.onl (Defendant No. 1); 0123movie.stream with the additional domains 0123movies.ltd. 123movie.lc, 123movies.college, 123movies.futbol, 123movies.click, 123-movies.win, 123movies.gl, 123-movies.sx, 123movies44.com, 123movies0.gr, 123moviesgo.io, 123moviesme.online, 123moviess.se and 123movies.net (Defendant No. 2); allmovieshub.de with the additional domains allmovieshub.pro, allmovieshub.mobi, allmovieshub.org.in and allmovieshub.pw (Defendant No. 3); hdhub4u.mom with the additional domains hdhub4u.top, hdhub4u.li, hdhub4u.mx, and hdhub4u.one (Defendant No. 4); mkvcinemas.bz with the additional domain mkvcinemas.nz (Defendant No. 5); movierulzhd.bar with the additional 7movierulz.do, domains moviesrulz.net, 4movierulz1.com, 7moviesrulz.com, movierulz2free.com, movierulz4k.com and 4movierulz.live (Defendant No. 6); moviesverse.club with the additional domains, moviesverse.biz, moviesverse.mobi, moviesverse.me, moviesverse.com and 9moviesverse.in (Defendant No. 7); putlocker99.me (Defendant No. 8); themoviesflix.com.mx with the additional domains

themoviesflix.us.com and themoviesflix.com.ph (Defendant No. 9); unblockit.day with the additional domains unblockit.cam and unblockit.how 10); uwatchfree.so with the additional (Defendant No. domains uwatchfree.fo, uwatchfree.do and uwatchfree.vg (Defendant No. 11); tamilblasters.buzz with additional domains tamilblasters.bid, tamilblasters.club, tamilblasters.com, tamilblasters.net, tamilblasters.re and tamilblasters.vin (Defendant No.12), hereinafter referred to as "Defendant Websites" collectively. It is contended that Defendant Websites are online locations which enable use of Defendant Websites' services, without any authorisation or license from the Plaintiffs, to: (a) view (by a process known as streaming/downloading) cinematograph films, motion pictures, television programs or other audio-visual content, on devices connected to the Internet; (b) cause copies of those cinematograph films to be downloaded onto the memory of their devices for watching later or enabling others to watch or further copy those cinematograph film, and/or (c) identify other online locations including (by a process known as "linking") which enable those users to engage in the activities set out in (a) or (b). An illustrative list of illegal content made available by Defendants No.1 to 12 has been provided in para 30 of the plaint.

17. Learned Counsel for the Plaintiffs contends that Defendant Websites provide illegal content for free and such availability of content is supported by the advertisements featuring on these websites. The primary purpose of the Defendant Websites is to commit or facilitate copyright infringement. Thus, Defendants No. 1 to 12 are liable for infringement under Section 51(a)(ii), Section 51(b) and Section 51(a)(i) of the Act, for making a copy of the original content, including storing of it in any medium by electronic or

other means and communicating the original content to the public. Further, the hosting, streaming reproducing, distributing, making available to the public, and/or communicating to the public of the original content, or facilitating the same, without authorization of the Plaintiffs, amounts to violation of the Plaintiffs' copyright work, protected under the Act. In support of the contention, reliance is placed on the decision of this court in CS(COMM) 724 of 2017 dated 10.04.2019, *UTV Software Communication Ltd. & Anr. v. 1337x.to and Ors.* 

- 18. Learned Counsel further submits that several of the domains/websites sought to be blocked by the present proceedings are really new iterations of domains/websites that were earlier blocked. Evidence collected by the investigator shows that the operators of the Defendant Websites are using known "pirate branding" to signal to users that the Defendant Websites are merely new iterations of sites that have been blocked earlier. Learned Counsel further submits that the Defendant Websites are in the form of new iterations and that the new iterations almost invariably have the same functionality and purpose as the earlier blocked sites and thus directions be issued to block the new iterations of the Defendant Websites as directed by the Court in *UTV Software Communication Ltd.* (supra).
- 19. It is submitted that despite the legal notice calling upon the concerned Defendants to cease from engaging in their infringing activities, they continue to infringe the rights in Plaintiffs' original content. Defendant No.2, despite replying to the legal notice, stating that their websites do not contain Plaintiffs' content, continues to host the same. Defendant No.7, in response to the legal notice, removed access to Plaintiffs' content on their website https://4moviesverse.cc. After investigating the accessibility of the said



CS(COMM) 265/2022 Page 5 of 8

website, Plaintiffs removed the same from the array of parties. However, should the same be made accessible again and continue its infringing activities by making available the Plaintiffs' copyrighted content, Plaintiffs seek liberty to implead Website https://4moviesverse.cc. Other than these two instances, it is contended that the Defendant Websites are wilfully infringing Copyright material and ignoring or failing to respond to notice to cease all infringement. Access to many of Defendant Websites has been previously disabled in other jurisdictions, as elaborated in para 37 of the Plaint.

- 20. Having heard learned counsel for the Plaintiffs, this Court is of the view that Plaintiffs have made out a *prima facie* case for grant of *ex parte ad-interim* injunction. Balance of convenience lies in favour of the Plaintiffs and they are likely to suffer irreparable harm in case the injunction, as prayed for, is not granted.
- 21. Accordingly, Defendants No. 1 to 12 (and any such other mirror/redirect/alphanumeric website which appears to be associated with any of the Defendant Websites based on its name, branding or the identity of its operator, or discovered to provide additional means of accessing, the Defendant Websites, and other domains/domain along with their subdomains and subdirectories, owners/website operators/entities which are discovered to have been engaging in infringing the Plaintiffs' exclusive rights), their owners, partners, proprietors, officers, servants, employees, and all others in capacity of principals or agents, acting for and on their behalf, or anyone claiming through, by or under them are hereby restrained, from, in any manner hosting, streaming, reproducing, distributing, making available to the public and/or communicating to the public, or facilitating the same, on

their websites, through the internet in any manner whatsoever, any cinematograph work/content/programme/show in relation to which Plaintiffs have a Copyright.

- 22. Further, as held by this Court in *UTV Software Communication Ltd*. (supra), in order for this Court to be freed from constant monitoring and adjudicating the issues of mirror/redirect/alphanumeric websites, it is directed that as and when the Plaintiffs file an application under Order 1 Rule 10 CPC for impleadment of such websites, Plaintiffs shall file an confirming that the newly impleaded affidavit website mirror/redirect/alphanumeric website which appears to be associated with any of the Defendant Websites based on its name, branding or the identity of its operator, or has been discovered to provide additional means of accessing the Defendant Websites and other domains/domain along with their subdomains and subdirectories, owners/website operators/entities which are discovered to have been engaging in infringing the Plaintiffs' exclusive rights, with sufficient supporting evidence. Such application shall be listed before the Joint Registrar, who on being satisfied with the material placed on record, shall issue appropriate directions to the ISPs.
- 23. Defendants No. 13 to 21 shall ensure compliance of this order by blocking Defendants No. 1 to 12 websites, their URLs and the respective IP addresses.
- 24. Defendants No. 22 and 23 are further directed to take immediate steps and issue requisite Notifications, calling upon various internet and telecom service providers registered under them to block the aforementioned websites identified by the Plaintiffs.



25. Plaintiffs shall comply with the provisions of Order 39 Rule 3 CPC within 10 days from today.

JYOTI SINGH, J

**APRIL 27, 2022/st** 



### Fwd: Compliance with Order of the Hon'ble Delhi High Court dated 3rd December 2024 in Universal City Studios LLC and Ors. v. Vegamovies.run & Ors. C.S. (COMM) 265 OF 2022

CL Cyber Law Legal <cyberlaw-legal@meity.gov.in>
Tue, 10 Dec 2024 11:16:14 AM +0530 •

- To "jto2ds2-dot" < jto2ds2-dot@gov.in>
- Cc "Deepak Goel" < gccyberlaw@meity.gov.in > , "Chinnasamy Vembadian" < chinnasamy.v@meity.gov.in > , "Avneet Toor Gupta" < avneett.g@nic.in > , "Nagarajan N" < nagarajan.n@meity.gov.in >

Dear Sir,

Request your attention to the trailing email as under. Would appreciate, if you could review it and take necessary action, as required.

Copy of the order of the Hon'ble Court has been attached for your convenience. Kindly, inform us once the needful has been done.

Thanks and Regards
Nagarajan. N
Scientist C
Cyberlaw Division
Ministry of Electronics and Information Technology (MeitY)
Tel: 9310759547

======= Forwarded message ========

From: Raghav Goyal < raghav@saikrishnaassociates.com >

To: "Cyber Law Legal"<<u>cyberlaw-legal@meity.gov.in</u>>, <<u>secy-dot@nic.in</u>>, "Subodh DS"<<u>dirds2-</u>

dot@nic.in>

Cc: "Priyanka Jaiswal" < priyanka@saikrishnaassociates.com >

Date: Mon, 09 Dec 2024 19:36:10 +0530

Subject: Compliance with Order of the Hon'ble Delhi High Court dated 3rd December 2024 in Universal City Studios LLC and Ors. v. Vegamovies.run & Ors. C.S. (COMM) 265 OF 2022

======== Forwarded message =========

#### WITHOUT PREJUDICE BY-EMAIL

Date: 09th December 2024

Dear Sir,

We act for the Plaintiffs in the above-captioned matter i.e. Universal City Studios LLC, Warner Bros. Entertainment Inc., Columbia Picture Industries Inc., Netflix Studios LLC., Paramount Pictures Corporation and Disney Enterprises, Inc. ("Our Clients") in the above-captioned matter.

Our Clients are the author and/ or first owner and / or owner of Pictures ("Original Content") for which they own exclusive copyrights. Our Clients instituted a Suit against various infringing websites before the Hon'ble High Court of Delhi, *inter alia*, for interim injunction restraining violation of its exclusive statutory rights in relation to the Original Content as well as for other reliefs. Our Clients also impleaded various internet and telecom service providers, as well as

the concerned Government Departments (Department of Telecommunication and the Ministry of Electronics and Information Technology), as Defendants, to ensure effective compliance of any orders that the Hon'ble Delhi High Court was inclined to pass.

The above-mentioned matter came up before Hon'ble Justice Jyoti, Delhi High Court on 27<sup>th</sup> April 2022. The Hon'ble Court was pleased to pass an interim injunction against the defendant websites and allowed the Plaintiffs to implead any mirror/redirect/alphanumeric websites providing access to the injuncted websites by way of filing Order I Rule 10, CPC application. The relevant extract of the Judgement is reproduced herewith:

"22. Further, as held by this Court in UTV Software Communication Ltd. (supra), in order for this Court to be freed from constant monitoring and adjudicating the issues of mirror/redirect/alphanumeric websites, it is directed that as and when the Plaintiffs file an application under Order 1 Rule 10 CPC for impleadment of such websites, Plaintiffs shall file an affidavit confirming that the newly impleaded website is a mirror/redirect/alphanumeric website which appears to be associated with any of the Defendant Websites based on its name, branding or the identity of its operator, or has been discovered to provide additional means of accessing the Defendant Websites and other domains/domain along with their subdomains and subdirectories, owners/website operators/entities which are discovered to have been engaging in infringing the Plaintiffs' rights, with sufficient supporting evidence. Such application shall be listed before the Joint Registrar, who on being satisfied with the material placed on record, shall issue appropriate directions to the ISPs."

A copy of the Judgment dated 27<sup>th</sup> April 2022 is attached herewith.

In view of the interim injunction order dated 27<sup>th</sup> April 2022 Our Clients had filed an Impleadment Application against the below mentioned websites, for impleading it as Defendants No.206-266, in the said suit:

Defendant Nos.	Defendant Domains
206.	vegamovies.am
207.	vegamovies.ps
208.	<u>vegamovies.si</u>
209.	<u>vegamovies.cv</u>
210.	vegamovies.now
211.	vegamovies.prof
212.	vegamovies.fm
213.	vegamovies.vu
214.	vegamovies.bi
215.	123moviewatch.com
216.	123moviesgo.xyz
217.	123movies.team
218.	123movie.biz
219.	123moviefreeze.com

220.	123moviesfreehd.org
221.	123movies-tv.com
222.	123moviespoint.com
223.	123moviesnewsite.com
224.	123xmovies8.com
225.	123moviestvshows.com
226.	123boxmovies.com
227.	hdhub4u.capetown
228.	hdhub4u.durban
229.	hdhub4u.wales
230.	hdhub4u.rsvp
231.	watchmovierulz.wf
232.	5movierulz.io
233.	5movierulz.boo
234.	watchmovierulz.re
235.	watchmovierulz.sh
236.	watchmovierulz.blog
237.	watchmovierulz.vet
238.	watchmovierulz.pm
239.	watchmovierulz.bar
240.	watchmovierulz.ph
241.	5movierulz.pro
242.	5movierulz.skin
243.	5movierulz.bid
244.	5movierulz.beer
245.	5movierulz.mom
	12

246.	5movierulz.land
247.	5movierulz.gift
248.	5movierulz.loan
249.	5movierulz.loans
250.	5movierulz.wine
251.	5movierulz.place
252.	5movierulz.ink
253.	5movierulz.show
254.	5movierulz.deals
255.	5movierulz.solar
256.	5movierulz.town
257.	5movierulz.store
258.	5movierulz.dad
259.	5movierulz.black
260.	themoviesflix.ae.org
261.	themoviesflix.mex.com
262.	1Tamilblasters.foo
263.	1Tamilblasters.mov
264.	1tamilblasters.pm
265.	1tamilblasters.link
266.	1tamilblasters.eu

That the Hon'ble High Court of Delhi vide Order dated 3<sup>rd</sup> December 2024, was pleased to implead the above-mentioned Defendants and has extended the interim injunction dated 27<sup>th</sup> April 2022 against the said Defendants. The relevant portion of the Order dated 3<sup>rd</sup> December 2024 is extracted hereinbelow:

<sup>&</sup>quot;1. The plaintiff is seeking to implead additional roguewebsites as defendant nos. 206 to 266 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 of the Investigator. Keeping in view the contents of the suit and the application, the same is allowed. The proposed defendants are impleaded as defendant nos. 206 to 266.

<sup>2.</sup> The amended memo filed alongwith this IA is taken on record. Steps be taken on filing of PF to serve through the electronic mode only, the newly impleaded defendants within a week.

3. The order blocking the rogue-websites passed by the Hon"ble Court on 27.04.2022 shall operate qua the freshly impleaded defendants as well, in terms of directions contained in para 21 to 24 of the said order. Accordingly, defendant ISP"s shall give effect to the injunction by blocking defendant nos. 206 to 266. Further concerned defendants i.e. Department of Telecommunications and Ministry of Electronics and Information Technology shall issue blocking orders against defendant nos. 206 to 266 within a period of one week. IA is allowed and disposed off accordingly."

Accordingly, we request you, DOT and MEITY (i.e. Defendant Nos. 22 & 23 respectively) comply with the order of the Hon'ble High Court of Delhi dated 3<sup>rd</sup> December 2024 by issuing appropriate blocking orders against the said websites as identified in Annexure-A (Attached).

A copy of the interim injunction dated 27<sup>th</sup> April 2022 and Order dated 3<sup>rd</sup> December 2024 along with a copy of the Impleadment Application and Documents as filed before the Hon'ble High Court of Delhi are being made available through the following link:

 $\underline{https://drive.google.com/drive/folders/1NzrY1rg5TKT0O4fIdiQFNV8OK0mbmCTM?usp=drive\_link}$ 

In view of the above facts and circumstances, we request you to comply with the Order of the Hon'ble High Court of Delhi dated 3<sup>rd</sup> December 2024 by blocking the Defendant Websites as mentioned above in this letter.

If you have any queries, please feel free to contact us.

Raghav Goyal,

Saikrishna & Associates,

Counsel for Plaintiffs

--

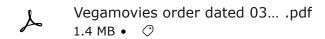
Raghav Goyal| Associate| Saikrishna & Associates, 57, Jor Bagh, First Floor, Delhi - 110003, India|Tel:+91-11-40244360 (100Lines) |Handphone: +91-9205464387 [EnrolmentNo. D/9590/2022]

- MANAGING IP Asia-Pacific 2020- Firm of the Year- India- Copyright
- WTR 1000 Gold Ranked Firm- Enforcement & Litigation 2016 2020
- CHAMBERS Asia Pacific 2015-2020 Leading Firm- IP & TM 2016-2020
- INDIAN BUSINESS LAW JOURNAL- Indian Law Firm Awards-Intellectual Property- 2019 & 2020
- INDIAN BUSINESS LAW JOURNAL Law Firm Awards- Media, Entertainment & Sport -2020
- MANAGING IP Global Awards 2014 Firm of the Year India Patent Contentious

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# IN THE HIGH COURT OF DELHI AT NEW DELHI (ORDINARY ORIGINAL COMMERCIAL JURISDICTION) CS(COMM) NO. 265 OF 2022

#### AMENDED MEMO OF PARTIES

(1) Universal City Studios LLC.

having its office at

100 Universal City Plaza, Universal City,

CA 91608, United States of America,

Email: antipiracy@nbcuni.com

(2) Warner Bros. Entertainment Inc.

having its office at

4000 Warner Boulevard, Burbank,

California 91522, United States of America

Email: antipiracy@warnerbros.com

(3) Columbia Pictures Industries, Inc.

having its office at

10202 W. Washington Blvd., Culver City,

CA 90232-3195 United States of America,

Email: copyright agent@spe.sony.com

(4) Netflix Studios, LLC

having its office at

100 Winchester Cir Los Gatos

CA, 95032-1815, United States of America,

Email: legal@netflix.com

(5) Paramount Pictures Corporation

having its office at

5555 Melrose Avenue, Hollywood,

CA, 90038, United States of America,

Email: Content Protection@paramount.com

(6) Disney Enterprises, Inc.

having its office at

500 S. Buena Vista, Burbank,

CA, 91521, United States of America,

Email: tips@disneyantipiracy.com ... Plaintiffs

#### Versus

(1) vegamovies.run

vegamovies.app

vegamovies.bar

vegamovies.cx

vegamovies.info

vegamovies.ink

vegamovies.nl

vegamovies.onl

Contact information: vegamovies@protonmail.com, admin@Vegamovies.nl, abuse@namecheap.com, support@centralnic.com

#### (2) 0123movie.stream

0123movies.ltd

123movie.lc

123movies.college

123movies.futbol

123movies.click

123movies.gl

123-movies.win

123-movies.sx

123movies44.com

123movies0.gr

123moviesgo.io

123moviesme.online

123moviess.se

123movies.net

Contact information: dmca@0123movie.net, abuse@namecheap.com, support@123movie.lc, abuse@dynadot.com, abuse@namesilo.com, hello@thedomain.io, abuse@netim.com, b9a0489ee1e84a17b80f6c59b11f42a9.protect@withheldforprivacy.com, 123moviesgoto.com@whoisprotectservice.net,

26145691a1b94a0d93ebec9483b132e0.protect@withheldforprivacy.com; abuse@danesconames.com

## (3) allmovieshub.de allmovieshub.pro allmovieshub.mobi

allmovieshub.org.in

allmovieshub.pw

Contact Information: admin@allmovieshub.de, abuse@godaddy.com

#### (4) hdhub4u.mom

hdhub4u.top

hdhub4u.li

hdhub4u.mx

hdhub4u.one

Contact Information: abuse@namecheap.com

#### (5) mkvcinemas.bz

mkvcinemas.nz

Contact Information: abuse@sarek.fi

#### (6) movierulzhd.bar

7movierulz.do

moviesrulz.net

4movierulz1.com

7moviesrulz.com

movierulz2free.com

movierulz4k.com

4movierulz.live

Contact Information: abuse@namecheap.com, info@nic.do,

a76798616a7f4093a4b02debb154349c.protect@withheldforprivacy.com,

5d863d655e514b438287bf8c99829b02. protect@withheldforprivacy.com,

movierulzfree@protonmail.com,

9b1a0453c0bd48ca9800d8d65cdc1.protect@withheldforprivacy.com,

dmca@openload.co, dmca@streamango.com,

83e43517ed394bbcb2087accab05dedd.protect@withheldforprivacy.com,

#### 2e32b5132c7b4cc9bfd4babe6478260d.protect@withheldforprivacy.com

(7) moviesverse.club

moviesverse.biz

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Date: 19th July, 2024

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#### **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.