813-7/25/2024-DS I/3235560/2024

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-07/2024-DS-II

23-12-2024

To,

All Internet Service Licensee

Subject: C.S. (COMM) No. 117 of 2024 [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 **04.12.2024** along with the **court order dated 07.02.2024** on the subject matter.

- 2. Please refer to para 13.3 of the Court Order dated 07.02.2024 in respect of blocking of websites enumerated in the memo of parties from Defendant 66 to 83.
- 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 with the said court order.

Digitally signed by Shashi Kumar

Date: 23-12-2024 09:46:06

Dir (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. 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.





\$~16

* IN THE HIGH COURT OF DELHI AT NEW DELHI

+ CS(COMM) 117/2024

UNIVERSAL CITY STUDIOS LLC & ORSPlaintiff

Through: Ms. Priyanka Jaiswal, Ms. Mehr

Sidhu, Advocates

Versus

FZKIDD.NET & ORS.

....Defendant

Through: None

CORAM: JOINT REGISTRAR (JUDICIAL) Dr. AJAY GULATI

> <u>O R D E R</u> 04.12.2024

%

I.A. No. 47127/2024 seeking impleadment of additional mirrors, redirects, or alphanumeric variations as defendant nos. 66 to 83.

- 1. 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.
- 2. The amended memo filed alongwith this IA is taken on record. Steps be taken to serve the newly impleaded defendants with summons within a week through the electronic mode only.
- 3. 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. IA is allowed and disposed off accordingly.

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

DECEMBER 4, 2024/sk

Click here to check corrigendum, if any





\$~43

* IN THE HIGH COURT OF DELHI AT NEW DELHI

+ CS(COMM) 117/2024

UNIVERSAL CITY STUDIOS LLC & ORS

..... Plaintiffs

Through: Mr. Saikrishna Rajagopal, Ms.

Suhasini Raina, Ms. Ramya Ramkumar and Mr. Mehr Sidhur,

Advocates.

versus

FZKIDD.NET & ORS.

..... Defendants

Through: None.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER 07 02 2024

%

I.A. 2908/2024 (seeking exemption from filing certified/ clearer/ proper/ translated copies of documents with proper margins)

- 1. Exemption is granted, subject to all just exceptions.
- 2. The Plaintiffs shall file legible and clearer copies of exempted documents, compliant with practice rules, before the next date of hearing.
- 3. Accordingly, the application stands disposed of.

I.A. 2909/2024 (u/Section 80 r/w Section 151 of the Code of Civil Procedure, 1908, seeking exemption from issuing notice to Defendant Nos. 38 and 39)

- 4. Issue notice to Defendants No. 38 and 39, by all permissible modes, upon filing of process fee, returnable on 10th July, 2024.
- 5. Reply, if any, be filed before the next date of hearing.

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- 6. Let the plaint be registered as a suit.
- 7. Upon filing of process fee, issue summons to the Defendants by all permissible modes. Summons shall state that the written statement(s) shall be filed by the Defendants within 30 days from the date of receipt of summons. Along with the written statement(s), the Defendants shall also file affidavit(s) of admission/denial of the documents of the Plaintiff, without which the written statement(s) shall not be taken on record.
- 8. Liberty is given to the Plaintiffs to file replication(s) within 15 days of the receipt of the written statement(s). Along with the replication(s), if any, filed by the Plaintiffs, affidavit(s) of admission/denial of documents of the Defendants, be filed by the Plaintiffs, without which the replication(s) shall not be taken on record. If any of the parties wish to seek inspection of any documents, the same shall be sought and given within the timelines.
- 9. List before the Joint Registrar for marking of exhibits on 16th April, 2024. It is made clear that any party unjustifiably denying documents would be liable to be burdened with costs.
- 10. List before Court for framing of issues thereafter.

I.A. 2907/2024 (u/Order XXXIX Rule 1 & 2 r/w Section 151 of the Code of Civil Procedure, 1908, restraining infringement of copyright)

- 11. Mr. Saikrishna Rajagopal, counsel for Plaintiffs, seeks an *ex-parte* adinterim injunction against streaming of Plaintiffs' original content/ work on rogue websites impleaded as Defendants No. 1 to 28, which is protected under the Copyright Act, 1957. He presents the Plaintiffs' case as follows:
- 11.1. The Plaintiffs namely, Universal City Studios LLC, Warner Bros.

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Entertainment Inc., Columbia Pictures Industries, Inc., Netflix Studios, LLC, Paramount Pictures Corporation, and Disney Enterprises, Inc., are amongst the world's leading entertainment companies, engaged in the production and distribution of motion pictures/ cinematograph films. They are the first author/ owner of these works and assert copyright protection therein.

11.2. There is a proliferation of a large number of online platforms enabling circulation of unauthorized, unlicensed and pirated content of the Plaintiffs to viewers. Defendants No. 1 to 28 are few of such rogue websites that are facilitating the streaming/viewing of cinematograph films and audio-visual content such as, motion pictures and television programs, inter alia generated by the Plaintiffs, on devices connected to the internet. They permit the viewers to store the content on their personal devices, leading to largescale copying and dissemination of such content to other unauthorized and unlicensed users. The said websites act as directories/ indexes of hyperlinks that redirect the end-user to the host site, where the content can be streamed or downloaded from a cloud storage site. Defendants No. 1, 2, 5, 6, 8, 9, 19, 11, 13, 17 and 25 even provide a refined search option to the user, where they can select the content on basis of the type, quality, genre, year of release etc. The operators of these websites employ techniques to mask their identities or provide incorrect details for the purpose of domain name registrations. For a ready reference, a list of impugned websites is attached to the present order as Annexure A.

11.3. Plaintiffs' legal notices to takedown the infringing content from the websites have been futile. Defendants No. 1 to 28 are thus knowingly engaging in the impugned activities, in utter disregard of the Plaintiffs' rights. In addition to enabling the hosting, uploading, steaming, reproducing,

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Generated from eOffice by Shashank Kumar, STENO(SK) - ADMIN II, STENO GR- D, Department of Telecommunication on 21/01/2025 02:49 pm





downloading etc. of Plaintiffs' works, Defendants No. 1 to 28 also offer hacks to users to circumvent detection or blocking orders. For instance, they recommend users to use VPN to stream the pirated content. Access to several of the Defendant-websites has been blocked across jurisdictions, including, Australia, England and Wales.

11.4. The above-noted assertions are further supported by the findings of a Private Investigator employed by the Plaintiffs. The Investigator has, through an extensive investigation, identified the major 'brands' of websites that provide pirated content and the various guises/ names under which the sites operate. Per the Investigator's report, if the websites are blocked/ taken down under a court order, the operators of such websites create mirroring websites, under the same name so as to draw traffic. For instance, one "ofilmyzilla.agency" which was ordered to be blocked by this Court *vide* judgment dated 31st August, 2021 in CS(COMM) 401/2022,¹ resembles Defendant No. 2 herein ["ofillyzilla.com.ms"]. A similar pattern has been noted in Defendants No. 1, 3 and 9.

11.5. The Plaintiffs have devoted enormous resources in the creation, production, distribution, marketing and advertising of their content. The act of copying Plaintiffs' original content and storing it on any media, and communicating the same to the public without Plaintiffs' assent amounts to infringement of the Plaintiffs' copyright by Defendants No. 1 to 28 in terms of Section 51(a)(i) and (ii) and Section 51(b) of the Copyright Act. In support of the above, reliance is placed on the judgments of this Court in *UTV Software Communication Ltd. and Ors v. 1337x.to and Ors*,² and

¹ Titled Universal City Studios LLC v. Myflixer.to and Ors.

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² DHC Neutral Citation: 2019:DHC:2047.





Universal City Studios LLC. & Ors. v. Dotmovies.baby & Ors.³

- 12. The Court has considered the afore-noted and perused the screenshots of impugned websites [Defendants No. 1 to 28] which reveal that the said Defendants are, on a real-time basis, offering for viewing and download the content originally produced by the Plaintiffs, without their consent or a valid license, resulting in financial losses to them. In these circumstances, given the need to adopt stringent measures to curb online piracy, as acknowledged by this Court on several occasions, the Plaintiffs have been able to demonstrate a *prima facie* case in their favour, and in case an *ex-parte* adinterim injunction is not granted, they will suffer an irreparable loss. Balance of convenience also lies in favour of the Plaintiffs, and against Defendants No. 1 to 28.
- 13. Referring to the judgment in *Universal City Studios LLC* (*Supra*), Mr. Saikrishna seeks a dynamic+ injunction in the present case. He emphasizes that the directions issued by this Court in the aforesaid judgment have facilitated identification and blocking of several rogue websites hosting pirated content on just a domestic level, but also internationally. In the opinion of the Court, present is a fit case for the grant of protection to future works that may be created by the Plaintiffs. Accordingly, the following directions are issued:
- 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

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³ DHC Neutral Citation: 2023:DHC:5842.





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

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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.

- 14. Compliance of Order XXXIX Rule 3 CPC be effected within five days. Compliance and service is permitted through e-mail owing to the fact that the exact contact details or addresses of these parties are not known.
- 15. Issue notice to the Defendants, by all permissible modes, upon filing of process fee, returnable on 10th July, 2024. Reply to the application be filed within four weeks from the service of the present order along with the paper book.
- 16. List before the Court on 10th July, 2024.

SANJEEV NARULA, J

FEBRUARY 7, 2024/as

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ANNEXURE – A

Particulars of Defendants No. 1 to 28

S. No.	Domain Name	URL	IP Address	
Defend	ant No. 1			
1.	fzkidd.net	https://fzkidd.net	104.21.55.121	
			172.67.148.24	
Defend	ant No. 2			
2.	ofilmyzilla.com.	https://www.ofilmyzilla. com.ms	104.21.38.99	
			172.67.221.129	
3.	ofilmyzilla.com.	https://ofilmyzilla.com.v e	104.21.69.149	
			172.67.209.93	
4.	ofilmyzilla.it	http://ofilmyzilla.it	104.21.33.68	
			172.67.159.135	
Defend	ant No. 3			
5.	tamilyogi.plus	https://tamilyogi.plus	176.119.25.26	
6.	tamilyogi.love	http://tamilyogi.love	176.119.25.26	
7.	tamilyogi.band	http://tamilyogi.band	176.119.25.26	
Defend	Defendant No. 4			
8.	soap2day.tel	https://soap2day.tel	104.21.94.221	

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			172.67.140.139
Defenda	ant No. 5		
9.	myflixer.la	https://myflixer.la	111.90.141.93
10.	flixer.ph	https://flixer.ph	104.21.81.48
			172.67.188.46
11.	myflixer.ph	http://myflixer.ph	159.89.195.240
Defenda	ant No. 6		
12.	sflix.watch	https://www1.sflix.watch	104.21.5.63
13.	sflixz.to	https://sflixz.to	172.67.183.133
Defenda	ant No. 7	<u> </u>	
14.	moviesmod.dev	https://moviesmod.dev	104.26.0.59
			104.26.1.59
			172.67.73.149
15.	moviesmod.wiki	https://moviesmod.wiki	104.21.53.236
			172.67.219.237
16.	moviesmod.one	https://moviesmod.one	104.21.79.159
			172.67.146.121
Defendant No. 8			

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17.	freemovies360.	https://freemovies360.cc	104.21.47.25		
	Cc				
			172.67.170.17		
Defenda	ant No. 9				
18.	streamm4u.com	https://ww1.streamm4u.c om	104.21.37.174		
			172.67.210.200		
19.	streamm4u.to	https://streamm4u.to	104.21.63.90		
			172.67.145.21		
Defenda	ant No. 10				
20.	desicinemas.ink	https://desicinemas.ink	104.21.25.222		
			172.67.134.204		
Defenda	ant No. 11	L			
21.	epxmovies.net	https://epxmovies.net	104.21.24.171		
			172.67.219.195		
Defenda	ant No. 12				
22.	movi.pk	https://movi.pk	104.21.49.206		
			172.67.192.136		
Defenda	Defendant No. 13				
23.	123moviesfree.m	https://123moviesfree.m	104.21.54.239		
			172.67.169.131		

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Defenda	ant No. 14				
24.	filmygallery.bab y	https://filmygallery.baby	104.21.47.44		
25.	filmygallery.app	http://filmygallery.app	104.21.79.78		
26.	filmygallery.cab	https://filmygallery.cab	104.21.74.121		
			172.67.158.91		
27.	filmygallery.club	http://filmygallery.club	104.21.24.94		
			172.67.218.37		
28.	filmygallery.foo	http://filmygallery.foo	104.21.94.154		
			172.67.137.201		
29.	filmygallery.lol	http://filmygallery.lol	104.21.92.53		
			172.67.186.207		
30.	filmygallery.pro	http://filmygallery.pro	104.21.87.115		
			172.67.143.6		
Defenda	Defendant No. 15				
31.	zorox.to	https://zorox.to	172.67.165.179		

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32.	zoro.vc	http://zoro.vc	104.21.66.209		
- a					
Defend	ant No. 16				
33.	flixwave.to	https://flixwave.to	104.21.44.190		
			172.67.203.60		
Defend	ant No. 17	<u> </u>			
34.	upmovies.to	https://upmovies.to	172.64.104.12		
			172.64.105.12		
Defend	ant No. 18	I			
35.	mydownloadhubt ube.net	https://mydownloadtube. net	104.21.36.51		
			172.67.185.163		
Defend	lant No. 19	<u> </u>			
36.	movie-web.app	https://movie-web.app	104.21.32.108		
			172.67.185.164		
Defend	ant No. 20				
37.	moviekhhd.biz	https://moviekhhd.biz	104.21.1.9		
			172.67.151.185		
Defend	Defendant No. 21				
38.	movieshd.watch	https://movieshd.watch	104.21.42.172		
			172.67.206.207		
-					

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Defend	ant No. 22		
39.	goflixtor.com	https://goflixtor.com	104.21.28.235
			172.67.147.201
Defend	ant No. 23		l
40.	cinehub.wtf	https://cinehub.wtf	107.189.2.163
Defend	ant No. 24		
41.	arc018.to	https://arc018.to	104.21.53.54
			172.67.209.35
Defend	ant No. 25		
42.	flixerplus.com	https://flixerplus.com	109.70.148.47
Defend	ant No. 26		<u> </u>
43.	netmovies.to	https://netmovies.to	104.21.31.158
			172.67.178.61
Defend	ant No. 27		L
44.	aniwatch.to	https://aniwatch.to	104.26.10.10
			104.26.11.10
			172.67.69.17
Defend	ant No. 28		
45.	toonstream.in	https://toonstream.in	104.21.45.222

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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

- 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: abuse@namecheap.com

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: toonstream786@gmail.com 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: support@cloudflare.com

42. zoroxtv.to

Email: support@cloudflare.com

43. filmyzilla.com.ng

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

44. filmyzilla.com.ve

Email: suppm1@cloudflare.com

tamilyogi.red 45.

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,

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ofilmyzilla.com.ht 54.

Email:staff@eurodns.com,

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- 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,

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

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77. zorotv.link

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- 79. tv.zoro.se
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 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

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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.