

**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-65/2024-DS-II**

**Dated:10-01-2025**

**To,**

All the Internet Service Licensee

**Subject: CS (Comm) No. 1215 of 2024 M/S RKS SV SECURITIES INDIA PVT. LTD. (UPSTOX) v. JOHN DOE/S & Ors. before the High Court of Delhi**

Kindly find enclosed the Hon'ble Delhi High Court order dated **24.12.2024** on the subject matter.

2. Please refer to the **para 41(viii)** of the said court order in respect of blocking of **websites** enumerated in Document E attached with 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 website, as above, for compliance of the said court order.

Digitally signed by

Shashi Kumar

Date: 10-01-2025 14:16:08

**Director (DS-II)**

**Email: dirds2-dot@nic.in**

Encl:A/A

**Copy to:**

- i. DGT, DoT for necessary action w.r.t blocking of Mobile Nos.
- ii. DDG(AS) for kind information pl.
- iii. 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**.
- iv. Sh. Rahul Kumar <rahul@sarvada.co.in> Plaintiff Advocate for kind information. [Requested to take action as per Annexure B]
- v. IT wing of DoT for uploading on DoT websites please.

\$~15

\* **IN THE HIGH COURT OF DELHI AT NEW DELHI**  
+ CS(COMM) 1215/2024, I.A. 49976/2024, I.A. 49977/2024, I.A. 49978/2024, I.A. 49979/2024, I.A. 49980/2024, I.A. 49981/2024 & I.A. 49982/2024

MS RKS SV SECURITIES INDIA PVT. LTD. UPSTOX .....Plaintiff  
Through: Mr. Balbir Singh, Sr. Adv. with Mr. M. P. Devnath, Mr. Abhishek Anand, Mr. Rahul Kumar, Mr. Karan Sachdev and Ms. Monica Benjamin, Advs.  
M: 7903435470

versus

JOHN DOES AND ORS. ....Defendants

Through: Mr. Sarfaraz Khan, Mr. Mriza Amir Baig and Mr. Abdul Wahid, Advs. for D-6 (Through VC)  
Mr. Sumit Nagpal, SPC with Ms. Laavanya Kaushik, GP and Ms. Aahana Sood, Advs. for D-20 and 21.  
M: 9911995000  
Mr. Madhav Khosla, Adv. for D-26.  
M: 9811039074  
Mr. Neel Mason, Ms. Ekta Sharma, Ms. Pragya Jain and Ms. Surabhi Katare, Advs. for D-28.  
M: 9425172896

**CORAM:**  
**HON'BLE MS. JUSTICE MINI PUSHKARNA**

**ORDER**  
**24.12.2024**

%

**I.A. 49980/2024 (Exemption from filing original and clear copies of documents with proper margins)**

1. The present is an application under Section 151 of the Code of Civil

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Procedure, 1908 ("CPC"), on behalf of the plaintiff, seeking exemption from filing original and clear copies of documents with proper margins.

2. Exemption is granted, subject to all just exceptions.
3. Plaintiff shall file original and clear copies of documents with proper margins, 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. 49979/2024 (Exemption from instituting 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 judgment of Supreme Court in the case of *Yamini Manohar Versus T.K.D. Keerthi, 2023 SCC OnLine SC 1382*, and Division Bench of this Court in *Chandra Kishore Chaurasia Versus RA Perfumery Works Private Ltd., 2022 SCC OnLine Del 3529*, exemption from attempting Pre-Institution Mediation, is granted.

7. Accordingly, the application stands disposed of.

**I.A. 49978/2024 (Exemption from advance service to the defendant no.1)**

8. The present is an application under Rule 22 of Delhi High Court Intellectual Property Rights Division Rules, 2022 read with Section 151 CPC seeking exemption from advance service to the defendant no.1.

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

**I.A. 49977/2024 (Application seeking leave to file additional documents)**

10. This is an application under Order XI Rule 1(4) read with Section 151

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CPC as amended by the Commercial Courts Act, 2015, seeking leave to file additional documents.

11. 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.

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

**I.A. 49981/2024 (Application seeking extension of time for filing Court Fees)**

13. The present application has been filed under Section 149 of the CPC, read with Section 151 CPC, seeking extension of time to file the Court Fees.

14. Learned counsel appearing for the plaintiff submits that the Court Fees shall be deposited within a period of two weeks, from today.

15. Liberty is so granted.

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

**I.A. 49982/2024 (Application seeking exemption from advance notice to defendant nos. 20 and 21)**

17. The present is an application under Section 80 of CPC filed by the plaintiff to seek exemption from advance notice to defendant nos. 20 and 21.

18. However, since defendant nos. 20 and 21 have appeared, the same has become infructuous, in that regard.

19. Accordingly, the present application is disposed of.

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20. Let the plaint be registered as suit.

21. Issue summons. Summons is accepted by learned counsels appearing for defendant nos. 6, 20, 21, 26 and 28. Written statement be filed by the said defendants within thirty days, from today.

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

23. 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.

24. List before the Joint Registrar (Judicial) for marking of exhibits, on 20<sup>th</sup> February, 2025.

25. List before the Court on 20<sup>th</sup> May, 2025.

**I.A. 49976/2024 (Application under Order XXXIX Rules 1 and 2 read with Section 151 CPC)**

26. The present suit has been filed for permanent injunction restraining infringement of trademarks, word mark and copyright, passing off, rendition of accounts, damages, dilution, etc.

27. It is submitted that the present action concerns the infringement of plaintiff's registered trademarks & word marks and action of passing off by defendant no. 1. It also concerns several actions of infringement of plaintiff's copyright by defendant no. 1. The plaintiff has not granted any license and authorization to the defendant no.1.

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28. It is submitted that the defendant no. 1 (whose identity is currently unknown to the plaintiff) is an individual/ entity who has registered various infringing domain names and is operating fake and fraudulent websites, WhatsApp and telegram groups, and using numerous phone numbers with the dishonest intention to defraud unsuspecting customers by luring them for various incentives regarding the stocks, IPOs, etc., in the name of the plaintiff across various locations in India. The plaintiff apprehends that there may be a group of connected individuals who are involved in these fraudulent and infringing activities, whose details cannot be ascertained by the plaintiff at this stage, and therefore, they are impleaded as John Doe/s'. The plaintiff seeks the liberty of this Court to implead all those individuals/entities whose details are disclosed by the other defendants impleaded in the suit under the directions of this Court.

29. It is submitted that on the basis of the information available with plaintiff, defendant no.1 has been using various domain names, applications, WhatsApp & Telegram Channels viz, for engaging in fraudulent activities. These infringing domains are registered with the Domain Name Registrars, Gname, BIZCN & JUMING, which are impleaded herein as defendant nos. 2, 3 and 4 respectively, to seek necessary disclosure of the registrant details, for locking/ suspension orders against the infringing domains.

30. It is submitted that the plaintiff along with its group companies owns and operates online portals (app as well as a website) which is being used by various retail investors in India for carrying out trading activity in the Stock Market and other allied investment / financial activities. These activities are duly regulated by SEBI, PFRDA and IRDAI. The plaintiff has a wide reach and has more than 1 crore customers.

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31. It is further submitted that Upstox was established as a unique and distinctive brand, tailored for the financial services industry. Since its launch, the plaintiff has consistently invested in marketing, branding, and strategic initiatives to build recognition and trust. The brand has gained a strong market reputation, reflected in growing customer base and positive media coverage.

32. It is submitted that Upstox is a unique and original brand name that clearly stands out from competitors in the financial services industry. Its distinctiveness makes it easy for customers to recognise and remember. By using such an innovative name, Upstox creates a strong identity, making its products and services different from others in the market.

33. Learned Senior Counsel appearing for the plaintiff has drawn the attention of this Court to the table as given in the plaint showing the various registrations in favour of the plaintiff.

34. It is submitted that for the past several months, the plaintiff has been receiving complaints about several domain names, WhatsApp groups, and Telegram groups/ channels that have been constantly portraying themselves as the plaintiff Company and its subsidiary and have committed fraud by duping money from several clients and users of the plaintiff Company by misusing the brand, logo, word mark and the copyright of the plaintiff.

35. It is submitted that it is further pertinent to mention that the plaintiff Company became cognizant of the abuse of its trademark and the trade name when it started to receive multiple complaints on its email from various stakeholders, who raised alarming concerns regarding various WhatsApp groups, Telegram groups and Facebook groups in the name of the plaintiff Company, that were engaged in soliciting money and

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defrauding the plaintiff's customers. These email correspondences also addressed the manner and instances in which they were duped with money, causing loss to the plaintiff's customers as well as impinging the reputation of the plaintiff Company.

36. It is submitted that the plaintiff submits that the above detailed facts, showing several instances of infringement of the plaintiff's trademark and copyright, unambiguously makes it clear that the defendant no. 1 has been constantly infringing the brand name, logo and copyright of the plaintiff with a sole motive to defraud it and causing a great damage to its goodwill as well as the clientele.

37. It is submitted that the plaintiff further submits that the infringement is not only causing damage to the plaintiff, but is also concerning the security and privacy of its domain name, trade name and logo.

38. It is submitted that the cause of action first arose in favour of the plaintiff and against the defendant no. 1 in the month of June when the plaintiff learnt about the several instances of fraud committed by defendant no. 1 through its infringing websites, applications and concerned phone numbers. The cause of action again arose on 05<sup>th</sup> June, 2024, when the plaintiff lodged the complaint for the cyber and online frauds committed by the defendant no. 1. The cause of action is a continuing one, till the said defendant is enjoined by an order of this Court.

39. Learned Senior Counsel appearing for the plaintiff has drawn the attention of this Court to the various documents, wherein, the mark of the plaintiff has been used by the defendants in an unauthorized manner, in order to dupe and fraud the people.

40. In view of the above circumstances, the plaintiff has demonstrated a

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

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

- i. Defendant no.1, its employees, servants, agents, representatives and/or others acting for and, on their behalf are restrained from infringing the plaintiff's registered UPSTOX trademarks, word marks, and/or any other deceptively similar variant/s thereof, in any manner, including, domain names, websites, social media handles names, hashtags, email addresses, bank accounts or any business papers, etc. or in any other manner which amounts to infringement of the plaintiff's UPSTOX trademarks/ passing off of the services and business of the defendant no.1 as that of the plaintiff.
- ii. Defendant no. 1, its employees, servants, agents, representatives and/or others acting for and, on their behalf, are restrained from using the plaintiff's original copyrighted photographs of the UPSTOX Brand, by reproducing or publishing the same in any manner, which constitutes infringement of the plaintiff's copyright vesting in the said photographs.
- iii. Defendant nos. 2 to 4 are directed to suspend the domain names detailed in Table-A, as attached with the present order.
- iv. Defendant nos. 2 to 4 are further directed to disclose complete details and file the complete KYC documents including payment details of the registrant of the domain names detailed in *Table-A*, attached with the present order.
- v. Defendant nos. 5 to 18, are directed to freeze the bank accounts, details of

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which are given as *Table-C* of the present order.

vi. The defendant nos. 5 to 18 are further directed to disclose and file the complete KYC documents as well as up to date bank statements of the owners/ beneficiaries of the bank accounts, detailed in *Table-C* of the present order.

vii. Defendant no.19 is directed to suspend and block all UPI IDs associated with the bank accounts, detailed in *Table-C*, attached with the present order.

viii. Defendant no. 20 and 21 are directed to issue notification, calling up all internet and telecom service providers registered under it to suspend access to the infringing domain, as details of which are given in *Table-A* of the present order.

ix. Defendant nos. 22, 23 and 24 are directed to block the phone numbers of defendant no.1, details of which are given *Table-B* with the present order.

x. Defendant no. 25 is directed to suspend all the WhatsApp profiles/ groups associated with the phone numbers, as detailed in *Table-B* attached with the present order.

xi. Defendant no. 26 is directed to suspend all the Telegram profiles/ groups and channels, which are as follows:

([https://t.me/sure\\_shot\\_upstock\\_omtrader](https://t.me/sure_shot_upstock_omtrader)),

([https://t.me/sure\\_shot\\_upstock\\_omtrader/20180](https://t.me/sure_shot_upstock_omtrader/20180)),

([https://t.me/sure\\_shot\\_upstock\\_omtrader/20179](https://t.me/sure_shot_upstock_omtrader/20179)),

([https://t.me/sure\\_shot\\_upstock\\_omtrader/20178?single](https://t.me/sure_shot_upstock_omtrader/20178?single))

xii. Defendant no.27 is directed to block the profile of Ms. Chitra Sharma, i.e.,:

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[https://www.linkedin.com/posts/chitra-sharma-37b97b28a\\_dni-for-code-i-had-earlier-recorded-it-activity-7205517180631678976-UDZH](https://www.linkedin.com/posts/chitra-sharma-37b97b28a_dni-for-code-i-had-earlier-recorded-it-activity-7205517180631678976-UDZH)).

xiii. Defendant no.27 is also directed to provide the relevant details associated with the aforesaid profile viz. the E-mail Id and Phone Number.

42. In case the plaintiff identifies any other domain/ website or any other social media account/ telephone number during the course of the proceedings in the present matter, the plaintiff is at liberty to file an affidavit with respect thereto, before the learned Joint Registrar (Judicial). Upon satisfaction, the learned Joint Registrar (Judicial) shall extend today's order to such new domains/ website/ telephone numbers.

43. In case of any doubt, the matter may be listed before this Court.

44. Issue notice. Notice is accepted by learned counsels appearing for defendant nos. 6, 20, 21, 26 and 28.

45. Issue notice to the other defendants by all permissible modes, upon filing of process fee, returnable on the next date of hearing.

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

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

48. Compliance of Order XXXIX Rule 3 CPC be done within a period of two weeks, from today.

49. Re-notify on 20<sup>th</sup> May, 2025.

**MINI PUSHKARNA, J**

**DECEMBER 24, 2024/kr**

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**IN THE HIGH COURT OF DELHI AT NEW-DELHI****(Ordinary Original Commercial Jurisdiction)**

C.S. (COMM) NO. 1215 of 2024

**IN THE MATTER OF:**

M/s RKSV Securities India Pvt Ltd ("Upstox") .... Plaintiff

VERSUS

John Doe /s and Ors. ....Defendants

**NOTICE OF MOTION**

To,

M/s RKSV Securities India Pvt Ltd ("Upstox")

Registered office at:

807, NEW DELHI HOUSE BARAKHAMBHA ROAD,

CONNAUGHT PLACE, NEW DELHI,

Delhi, India - 110001

Corporate Office at:

30TH FLOOR,

SUNSHINE TOWER

SENAPATI BAPAT MARG,

DADAR (W) MUMBAI - 400013

Email: rahul@sarvada.co.in

...Plaintiff

VERSUS

John Doe/s

(Owner and operator of)

Email: ...Defendant no.1

Gname.com Pte. Ltd.

8 Temasek Boulevard SUNTEC TOWER

Three S 038988, SINGAPORE

Email : [Service@gname.com](mailto:Service@gname.com) ...Defendant no.2

BIZCN .com, Inc

Shangzhong Online Technology Co., Ltd

5th Floor, Tongda International Center, No. 18,

Kaohsiung Road, Guanyinshan Business District,

Siming District, Xiamen Postal Code: 361008

Email: [abuse@bizcn.com](mailto:abuse@bizcn.com) .... Defendant No. 3

JUMING

Hefei Xunyun Network Technology Co., Ltd.

21st Floor, Block A, Landmark Plaza,

Hefei Municipal Affairs District

(directly opposite Anhui TV Station), China

Email: [fw@juming.com](mailto:fw@juming.com) .... Defendant No. 4

State Bank of India

State Bank of India

State Bank Bhavan, 16th Floor

Madam Cama Road,

Mumbai 400 021

Email: [customercare@sbi.co.in](mailto:customercare@sbi.co.in)

Email: [contactcentre@sbi.co.in](mailto:contactcentre@sbi.co.in)

Email: [gm.customer@sbi.co.in](mailto:gm.customer@sbi.co.in)

.... Defendant No. 5

UCO Bank

7th Floor Head Office,

10 BTM Sarani, Kolkata-700001

Email: [holaw.calcutta@ucobank.co.in](mailto:holaw.calcutta@ucobank.co.in)

(Acc. No. 04860210004418 IFSC UCBA0000486), (Acc. No.

19250210002780 IFSC UCBA0001925) .... Defendant No. 6

RBL Bank

RBL Bank Ltd. One world Centre,

Tower 2B, 6<sup>th</sup> Floor, 841

Senapati Bapat Marg, Lower Parel (W)

Mumbai 400 013. India

Email: [vigilance@rblbank.com](mailto:vigilance@rblbank.com)

(Acc. No. 409001206488 IFSC RATN0000152 ...Defendant No.7

SARASWAT Bank

Saraswat Co-operative Bank Limited

Ekanath Thakur Bhavan 953,

Appasaheb Marathe Marg, Prabhadevi.

Mumbai- 400 025

Email: [corporatecentel@saraswatbank.com](mailto:corporatecentel@saraswatbank.com)

Defendant No. 7

(Acc. No. 610000000032076 IFSC SRCB0000339) ...Defendant No.8

Bandhan Bank

Floors 12-14, Adventz Infinity@5

BN 5, Sector V, Salt Lake City,

Kolkata, West Bengal, India, 700091

Email: [customercare@bandhanbank.com](mailto:customercare@bandhanbank.com)

(Acc. No. 20100029590869 IFSC BDBL0002429), (Acc. No.

10230008506384 IFSC BDBL0001 179), (Acc. No.

20100029270997 IFSC BDBL0001559) ...Defendant No.9

Bank of Maharashtra

Bank of Maharashtra Head Office

Lokmangal, 1501, Shivajinagar

Pune-411005

Email: [hocomplaints@mahabank.co.in](mailto:hocomplaints@mahabank.co.in)

[cmcustomerservice@mahabank.co.in](mailto:cmcustomerservice@mahabank.co.in)

(Acc. No. 60496369054 IFSC MAHB0001461), (Acc. No.

20100026382785 IFSC BDBL0002530) ... Defendant No. 10

DBS

D.No. 76-8/8-18,

Swathi Theater Center Vijayawada, Crombay Road,

Bhavanipuram 520012

Email: [customercareindia@dbs.com](mailto:customercareindia@dbs.com)

(Acc. No. 8148210000008938 IFSC DBSSOIN0148)

...Defendant No.11

Jana Small Finance Bank

The Fairway Business Park, First Floor,

Survey No.10/ 1, 11/2 & 12/2B,

Off Domlur, Koramangala Inner Ring Road,

Next to EGL Business Park Challaghatta,

Bengaluru – 560071

Email: [customercare@ianabank.com](mailto:customercare@ianabank.com)

(Acc. No. 4761020000722577 IFSC JSFB0004761), (Acc. No.

4552020001091503 IFSC JFSB0004552) ...Defendant No.12

Ratankar Bank Limited

One Indiabulls Centre, Tower 2B,

6th Floor, 841, Senapati Bapat Marg,

Lower Parel (W), Mumbai 400013, India

Email: [cu stomercare@2rblbank.com](mailto:cu stomercare@2rblbank.com)

(Acc. No. 409002254877 IFSC RATN0000193), (Acc. No.

409002075731 IFSC RATN0000240) ... Defendant No. 13

IndusInd Bank Ltd.

IndusInd Bank Limited, 2401

Gen. Thimmayya Road (Cantonment),

Pune-411 001, India.

Email: [investor@indusind.com](mailto:investor@indusind.com)

...Defendant No.14

Indian Overseas Bank

3rd Floor, Rachna Building 2,

Rajendra Place, Pusa Road,

New Delhi - 110008

Email: [cybercell@iob.in](mailto:cybercell@iob.in)

(Acc. No. 377202000000345 IFSC IOBA0003772), (Acc. No.

192502000000535 IFSC HDFC000 1925) ... Defendant No. 15

The COSMOS CO-OP, Bank Ltd.

The Cosmos Co-operative Bank Ltd.

Cosmos Tower, Plot No-6, S.No-132/B,



ICS Colony, Ganeshkhind Road,  
Pune - 411 007 Maharashtra, India.

Email: [customercarMcosmosbank.in](mailto:customercarMcosmosbank.in)

(Acc. No. 126100103896 IFSC COSB0000126) ... Defendant No. 16

HDFC Bank Ltd.

Ramon House, 169, Backbay reclamation,

HT Parekh Marg, Churchgate,

Mumbai – 400020

Also at:

HDFC House, H T Parekh Marg,

165-166, Backbay Reclamation,

Churchgate, Mumbai - 400 020.

Email: [ripal.sheth@hdfcbank.com](mailto:ripal.sheth@hdfcbank.com)

Defendant No. 16

(Acc. No. 50200086562130 IFSC HDFC0001631) ...Defendant No.17

Axis Bank Limited,

Trishul, 3rd Floor,

Opposite Samartheswar Temple,

Near Law Garden, Ellis Bridge,

Ahmedabad - 3 80006

Also at:

Axis Bank Branch,

Plot No. 88/91, Haware Centurion Mall,

Nerul East, Sector 19A,

Navi Mumbai, Maharashtra - 400706

Email- [PNO@axisbank.com](mailto:PNO@axisbank.com)

(Acc. No. 924020011014877 IFSC UTIB0002564) .. Defendant No. 18

National Payment Corporation of India  
Level 8, The Executive Centre,  
DLF Centre, Sansad Marg,  
Connaught Place,  
New Delhi - 110001  
Through its Managing Director & CEO  
Email: [contact@npci.org.in](mailto:contact@npci.org.in);  
[priyanka.agrawal@npci.org.in](mailto:priyanka.agrawal@npci.org.in)

...Defendant No.19

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

...Defendant No.20

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

...Defendant No.21

Reliance Jio Infocomm Limited

Regional office at:

RK Four Square,

Building Number - 4,

DLF Cyber City, Phase -2,

Gurgaon - 122002

E-mail: [care@jio.com](mailto:care@jio.com),

[Hitesh.marthak@relianceada.com](mailto:Hitesh.marthak@relianceada.com)

[Kapoor.guliani@ril.com](mailto:Kapoor.guliani@ril.com)

[sunil.kr.gupta@ril.com](mailto:sunil.kr.gupta@ril.com)

[mahipal.singh@ril.com](mailto:mahipal.singh@ril.com)

[sunil.kr.gupta@ril.com](mailto:sunil.kr.gupta@ril.com)

[shilpi.kant@ril.com](mailto:shilpi.kant@ril.com)

[jyoti.jain@ril.com](mailto:jyoti.jain@ril.com)

... Defendant No. 22

Bharti Airtel Limited.

Airtel Centre, Tower-A, 6th Floor,

A-wing, Plot No. L6, Udyog Vihar,

Ph-IV, Gurgaon-122016

Email: amit.[bhatia@airtel.com](mailto:bhatia@airtel.com)

...Defendant No.23

Vodafone Idea Limited

Vodafone House

Peninsula Corporate Park

Ganpatrao Kadam Marg,

Lower Parel, Mumbai- 400 013 India

E-mail: [amit.jain7@vodafoneidea.com](mailto:amit.jain7@vodafoneidea.com);

[abhishek.jhal@vodafoneidea.com](mailto:abhishek.jhal@vodafoneidea.com)

...Defendant No.24

Meta Platform Inc.

Unit 28 and 29

The Executive Centre

Level 18, DLF Cyber City.

Building No. 5, Tower A, Phase III

Gurugram, Haryana, India-122002

Email: [fbgoindia@support.facebook.com](mailto:fbgoindia@support.facebook.com)

...Defendant No.25

Telegram Messaging Inc. Through

Mr. Abhimanyu Yadav,

Designated Grievance Officer,

H.O. 71-75, Shelton Street,

Covent Garden, London, UK

Email: [abhimanyu@telegram.org](mailto:abhimanyu@telegram.org)

[Grievance-in@telegram.org](mailto:Grievance-in@telegram.org)

...Defendant No.26

LinkedIn Corporation

Grievance Officer for LinkedIn -

Legal Content Policy Manager,

LinkedIn Technology Information Pvt. Ltd.,

Tower A, Global Technology Park,

Bangalore 560103.

Email: [linkedin\\_support@cs.linkedin.com](mailto:linkedin_support@cs.linkedin.com)

[linkedin@e.linkedin.com](mailto:linkedin@e.linkedin.com)

...Defendant No.27

Google LLC  
Attn: Jim Pinter  
1600 Amphitheatre Parkway  
Mount View, CA 94043  
United States of America  
Email: [support-in@google.com](mailto:support-in@google.com)

...Defendant No.28

Sir / Madam,

The enclosed petition is being filed on behalf of the M/s RKS SV Securities India Pvt. Ltd. , i.e., the Plaintiff and has been accepted to be listed on \_\_\_\_\_, or soon thereafter as may be convenient to the Hon'ble Court. Please take notice accordingly.

**FILED THROUGH**



MP Devnath|Abhishek Anand|  
Rahul Kumar|

**ADVOCATES FOR THE PETITIONER**  
C-564, DEFENCE COLONY  
NEW-DELHI-110024  
Mobile: +91-7903435470  
Email: [rahul@sarvada.co.in](mailto:rahul@sarvada.co.in)

**PLACE: NEW DELHI**

**DATE: 13.12.2024**

**Table-A**

<b>Infringing Domain Names</b>	<b>Registrars of Domain Names</b>
<a href="https://www.upsxotho.xvz/">https://www.upsxotho.xvz/</a>	Gname.com Pte. Ltd. <a href="mailto:Service@gname.com">Service@gname.com</a>
<a href="https://www.investoxen.com/h5/#/login">https://www.investoxen.com/h5/#/login</a>	Gname.com Pte. Ltd. <a href="mailto:Service@gname.com">Service@gname.com</a>
<a href="https://www.hurryupstore.com/app/android">https://www.hurryupstore.com/app/android</a>	Gname.com Pte. Ltd. <a href="mailto:Service@gname.com">Service@gname.com</a>

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<a href="http://www.investoxen.com">www.investoxen.com</a>	<u>iii</u> Gname.com Pte. Ltd. <a href="mailto:Service@gname.com">Service@gname.com</a>
<a href="http://www.coinvestox.com">www.coinvestox.com</a>	Gname.com Pte. Ltd. <a href="mailto:Service@gname.com">Service@gname.com</a>
<a href="https://www.supstoree.com/h5/#/login">https://www.supstoree.com/h5/#/login</a>	Gname.com Pte. Ltd. <a href="mailto:Service@gname.com">Service@gname.com</a>
<a href="https://www.getuipo.com/h5">https://www.getuipo.com/h5</a>	Gname.com Pte. Ltd. <a href="mailto:Service@gname.com">Service@gname.com</a>
<a href="https://www.uipotruc.com/h5/#/mine">https://www.uipotruc.com/h5/#/mine</a>	Gname.com Pte. Ltd. <a href="mailto:Service@gname.com">Service@gname.com</a>



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	<u>m</u>
<a href="https://www.iusoho.xyz">https://www.iusoho.xyz</a>	Gname.com Pte. Ltd. <a href="mailto:Service@gname.com">Service@gname.com</a> <u>m</u>
<a href="https://www.uipogold.com/h5/#/mine">https://www.uipogold.com/h5/#/mine</a>	Gname.com Pte. Ltd. <a href="mailto:Service@gname.com">Service@gname.com</a> <u>m</u>
<a href="https://www.uipobest.com/h5">https://www.uipobest.com/h5</a>	Gname.com Pte. Ltd. <a href="mailto:Service@gname.com">Service@gname.com</a> <u>m</u>
<a href="https://www.tcastox.com/">https://www.tcastox.com/</a>	Gname.com Pte. Ltd. <a href="mailto:Service@gname.com">Service@gname.com</a> <u>m</u>
<a href="https://www.uipovip.com/app/android">https://www.uipovip.com/app/android</a>	Gname.com Pte. Ltd. <a href="mailto:Service@gname.com">Service@gname.com</a> <u>m</u>



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<a href="https://www.uipotrue.com/l5/">https://www.uipotrue.com/l5/</a>	Gname.com Pte. Ltd. <a href="mailto:Service@gname.com">Service@gname.com</a>
<a href="https://www.uipoing.com/h5/#/min">https://www.uipoing.com/h5/#/min</a> e	Gname.com Pte. Ltd. <a href="mailto:Service@gname.com">Service@gname.com</a>
<a href="http://www.mixitupstore.com">www.mixitupstore.com</a>	Gname.com Pte. Ltd. <a href="mailto:Service@gname.com">Service@gname.com</a>
<a href="http://www.theupstoe.com">www.theupstoe.com</a>	Bizcn.com, Inc. <a href="mailto:abuse@bizcn.com">abuse@bizcn.com</a>
<a href="https://www.theupstoe.com/h5">https://www.theupstoe.com/h5</a>	Bizcn.com, Inc. <a href="mailto:abuse@bizcn.com">abuse@bizcn.com</a>
<a href="https://www.yupstocks.com/h5">https://www.yupstocks.com/h5</a>	Bizcn.com, Inc. <a href="mailto:abuse@bizcn.com">abuse@bizcn.com</a>
<a href="https://www.theupstoe.com/app/an">https://www.theupstoe.com/app/an</a>	Bizcn.com, Inc.

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droid, ( <a href="https://apps.apple.com/cn/app/u%CF%81s%CF%84a%CF%87ib/id6505010114">https://apps.apple.com/cn/app/u%CF%81s%CF%84a%CF%87ib/id6505010114</a> )	<a href="mailto:abuse@bizcn.com">abuse@bizcn.com</a>
<a href="https://www.bristox.com/app/andro">https://www.bristox.com/app/andro</a> id	Bizcn.com, Inc. <a href="mailto:abuse@bizcn.com">abuse@bizcn.com</a>
<a href="https://www.theupstoe.com/h5/">https://www.theupstoe.com/h5/</a>	Bizcn.com, Inc. <a href="mailto:abuse@bizcn.com">abuse@bizcn.com</a>
<a href="https://www.ifups.com/app/ios">https://www.ifups.com/app/ios</a>	JUMING <a href="mailto:fw@juming.com">fw@juming.com</a>

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**Table-B**

Phone Numbers	Service Providers
1. 9571855265	Bharti Airtel Ltd.
2. 8905434219	
3. 7425909478	
4. 9256186096	
5. 9257566947	
6. 9216643219	
7. 7425953864	



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8. 7568951867
9. 9257996203
10. 9725541279
11. 9163263244
12. 8790431232
13. 9581361653
14. 7362903991
15. 9793659657
16. 8401340847
17. 9163337565
18. 8923070852
19. 7368063899
20. 8401493498
21. 9216352652
22. 95193 10574
23. 76529 25646
24. 84296 06644
25. 7388166262
26. 7276213835
27. 8293034690
28. 8438630435
29. 7397035782
30. 8790982734
31. 9601313772
32. 7548843835
33. 7041280599
34. 9558840383
35. 9558288271
36. 7302862413
37. 9056242661
38. 7305930831
39. 9748920795



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1. 8307572908 2. 8708859153 3. 8401664169	Reliance Jio Infocomm Limited
1. 8446373436 2. 7610253342 3. 7845765378 4. 7450049397 5. 9640580310 6. 7509861964 7. 8291881855	Vodafone Idea Limited



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**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.