

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-07/2022-DS-II

Dated:23-12-2024

To,

All Internet Service Licensees

**Subject: CS (COMM) No. 116 of 2022; Universal City Studios LLC. & Ors. v/s 123movieshub.tc & ors. before Hon'ble Delhi High Court.**

Kindly refer to the following:

- i. Hon'ble Delhi High Court order dated **06.12.2024** on the subject.
- ii. **Para 26** of Hon'ble Delhi High Court order dated 21.02.2022 regarding blocking of website identified by plaintiff.
- iii. Memo of Parties in CS (Comm) No. 116 of 2022.

(Copies enclosed for ready reference)

2. In view of the above all the Internet Service licensees are hereby instructed to take immediate necessary action for blocking access to websites of defendant no. **65 and 72**.

Digitally signed by

Shashi Kumar

Date: 23-12-2024 09:57:36

**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. Mr. Rakesh kumar (rakeshkumarcgsc@gmail.com), learned Central Government Standing Counsel for kind information.
- iii. Sanidhya Rao (sanidhya@saikrishnaassociates.com), plaintiff advocate counsel for the kind information [ Pl. take action as per Annexure]
- iv. IT wing, DoT for uploading on DoT Website please.



\$~11

\* **IN THE HIGH COURT OF DELHI AT NEW DELHI**  
 + CS(COMM) 116/2022  
 UNIVERSAL CITY STUDIOS LLC. & ORS. ....Plaintiff

Through: Ms. Priyanka Jaiswal,  
 Mr. Raghav Goyal, Ms. Mehr  
 Sidhu, Advocates

versus

123MOVIESHUB.TC & ORS. ....Defendant

Through: Mr. Rakesh Kumar, CGSC with  
 Mr. Sunil, Advocate for D-44, 45

**CORAM:**  
**JOINT REGISTRAR (JUDICIAL) Dr. AJAY GULATI**

**ORDER**

% **06.12.2024**

**I.A. No. 47416/2024 seeking impleadment of additional mirrors, redirects, or alphanumeric variations as defendants 65 to 72.**

1. The plaintiff is seeking to implead additional rogue-websites as defendant nos. 65 to 72 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. Plaintiffs rely on the judgment delivered by Hon'ble High Court of Delhi in *UTV Software Communication Ltd. & Anr. vs. 1337x.to and Ors.* in support of their prayer for impleadment of rogue websites and also for seeking extension of the injunction order dated **21.02.2022** passed by the Hon'ble Court in this suit, to the proposed defendants. Keeping in view the contents of the suit and the application, the same is allowed. The proposed defendants are impleaded as defendant nos. 65 to 72.



2. The amended memo filed alongwith this IA is taken on record. Steps be taken to serve the newly impleaded defendants with summons within two weeks, through the electronic mode only.
3. The order blocking the rogue-websites passed by the Hon'ble Court on **21.02.2022** shall operate qua the freshly impleaded defendants as well, in terms of directions contained in **para 25 & 26** of the order dated **21.02.2022**.
4. IA is allowed and disposed off accordingly.

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

**DECEMBER 6, 2024/sk**

[Click here to check corrigendum, if any](#)



\$~15

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

+ CS(COMM) 116/2022

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

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

Versus

123MOVIESHUB.TC & ORS. .... Defendants

Through: None.

**CORAM:**  
**HON'BLE MS. JUSTICE ASHA MENON**

**ORDER**  
**21.02.2022**

%

**I.A. 2718/2022 (exemption)**

1. Allowed, subject to all just exceptions.
2. The application stands disposed of.

**I.A. 2719/2022 (of the plaintiffs seeking exemption from issuing notice to the defendant No. 44, Department of Telecommunications (DoT) and defendant No. 45, the Ministry of Electronics and Information Technology (MEITY) under Section 80 CPC)**

3. For the reasons stated in the application, the same is allowed and the plaintiffs are exempted from serving advance notice to defendants No.44 and 45 under Section 80 CPC.
4. The application stands disposed of.

CS(COMM) 116/2022

Page 1 of 17



**I.A. 2720/2022 (of the plaintiffs under Section 12A of the Commercial Courts Act, 2015 read with Section 151 CPC seeking exemption from instituting pre-suit mediation)**

5. For the reasons stated in the application, the same is allowed and the plaintiffs are exempted from instituting pre-institution mediation.

6. The application stands disposed of.

**CS(COMM) 116/2022, I.A. 2717/2022 (of the plaintiffs under Order XXXIX Rules 1 and 2 read with Section 151 CPC restraining infringement of copyright)**

7. This is a suit for permanent injunction, rendition of accounts, damages IPR, copyright etc. filed by six plaintiffs, namely, (i) Universal City Studios LLC., (ii) Warner Bros. Entertainment Inc., (iii) Columbia Pictures Industries, Inc., (iv) Netflix Studios, LLC, (v) Paramount Pictures Corporation and (vi) Disney Enterprises, Inc.

8. The defendants No.1 to 34 are described as rogue websites indulging in online piracy by permitting access to illegal downloads of the movies of the plaintiffs. Defendants No.35 to 43 are Internet Service Providers ('ISPs'), defendant No. 44 is the Department of Telecommunications ('DoT') and defendant No.45 is the Ministry of Electronics and Information Technology ('MEITY').

9. The suit has been filed with the prayer for permanent injunction restraining defendants No.1 to 34 or any such other mirror/redirect/alphanumeric website which appears to be associated with any of these websites 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/program/show in relation to which the plaintiffs have copyright.

10. Mr. Saikrishna Rajagopal, learned counsel for the plaintiffs submits that the suit is maintainable in the present form, as the plaintiffs have been affected by these rogue websites on account of the unlawful streaming of their creative and original work and thus, there were common facts and questions of law involved. Reliance has been placed on the decision of a Division Bench of this Court in ***Microsoft Corporation and Anr. vs. Sujan Kumar and Ors.*** [order dated 04<sup>th</sup> February, 2016 in RFA(OS)(COMM) 1/2016], to submit that if separate Court fee was paid as has been done in the present matter, the suit in the present form was maintainable. It is also submitted that in similar suits filed, interim protection has also been granted (reference is made to the orders in ***Disney Enterprises Inc. & Ors. vs. Kimcartoon.to & Ors.*** [order dated 27<sup>th</sup> July, 2020 in CS 275/2020], ***Universal City Studios LLC and Ors. vs. Myflixer.to and Ors.*** [order dated 31<sup>st</sup> August, 2021 in CS (COMM) 401/2021], ***Universal City Studios LLC and Ors. vs. Dramacool.news and Ors.*** [order dated 26<sup>th</sup> November, 2021 in CS (COMM) 605/2021], and ***Disney Enterprises Inc. & Ors. vs Rlsbb.unblocked.ltada & Ors.*** [judgement dated 12<sup>th</sup> March, 2020 in CS(COMM) 594/2019]

11. Order I Rule 1 CPC reads as under :

“ORDER I

*Parties to Suits*

*1. Who may be joined as plaintiffs.—All persons may be joined in one suit as plaintiffs where—*





plaintiff is not identical to that of the other. What is identical is the allegation that copyright has been infringed. There is no identity of copyright, the work, the infringement of each work of the plaintiffs by each one of the defendants. Thus, the requirements of Order I Rule 1(a) & (b) CPC are not met in the present suit and all of the plaintiffs could not join in one suit, even against a similar set of defendants.

14. The decision in *Microsoft Corporation and Anr (supra)* related to the mis-joinder of the defendants, as also the mis-joinder of the causes of action. However, in that case, the rejection of the plaint on the ground of misjoinder of defendants and the causes, was found not to be proper. However, subsequently, the parties settled the matter in the RFA (OS) (COMM) 1/2016. In the judgment of the learned Single Judge from which *Microsoft Corporation and Anr (supra)* had arisen and which is reported as *Microsoft Corporation v. Sujan Kumar*, 2015 SCC OnLine Del 14356, it was observed that when various subject matters were joined in one suit which essentially formed different causes of action, then under Section 17 of the Court Fee Act, 1860, separate court fee was required to be paid. Furthermore, it was observed that when the plaintiffs claimed common questions of law and facts to file a single suit qua separate defendants who were separate legal entities, the facts and causes were to be pleaded separately qua different defendants. In the present case, learned counsel for the plaintiffs has submitted that separate court fees in respect of each of the plaintiffs had been paid and that therefore, the requirements of law were met in the present case. But paying requisite court fees cannot validate what is not within the procedure prescribed.





15. Even though it is clear that the suit does not fall within the prescription of Order Rule 1(a) or/and (b) CPC, there is no doubt that the court cannot reject the suit on the ground of this “procedural objection”. It is also evident from Order I Rule 2 that where it appears to the court that any joinder of plaintiffs may embarrass or delay the trial of the suit, the court may put the plaintiffs to their election to or order separate trials or “make such other order as may be expedient”. This clarifies the position that where several plaintiffs are joined in a suit, even improperly, the suit cannot be rejected. The Supreme Court in ***Prem Lala Nahata and Anr. vs. Chandī Prasad Sikaria*** 2007 (2) SCC 551) has observed –

*“16.....there is no such prohibition or a prevention at the entry of a suit defective for misjoinder of parties or of causes of action. The court is still competent to try and decide the suit, though the court may also be competent to tell the plaintiffs either to elect to proceed at the instance of one of the plaintiffs or to proceed with one of the causes of action....”*

16. The court will have to use its discretion to allow the plaintiffs to elect and thereafter to order separate trials. It is an option available with this Court therefore to direct the splitting of the suits specifically for each of the plaintiffs and direct separate trial in each suit.

17. But the court also has power to consolidate suits in appropriate cases. The purpose of such consolidation is not just for deciding common questions of law or fact but also for “other reasons” including convenience in decision making (see : ***Prem Lala Nahata (supra)*** relying on Halsbury’s Laws of England, Vol. 37, para 69). Ultimately, in the present set of matters, if the









legal notices issued to them have evoked no response. Such illegal websites made with the primary and sole objective to pirate copyrighted works for their own commercial benefits cannot be permitted to continue doing so, to await the disposal of the suit. Therefore, the defendants No.35 to 43 are directed to block access to these websites as mentioned below :

LIST OF WEBSITES

S. No.	Domain Name	URL	IP Address
Defendant No. 1			
1.	123movieshub.tc	https://ww5.123movieshub.tc	172.64.206.23 172.64.207.23
2.	123moviesfree4u.com	https://www4.123moviesfree4u.com	172.67.166.56 104.21.82.249
3.	0123movie.ru	https://0123movie.ru	162.159.137.85 162.159.138.85
4.	123movieshindi.net	https://123movieshindi.net	104.21.48.56 172.67.178.208
5.	123movieshindi.com	http://123movieshindi.com	172.67.168.166 104.21.94.199
6.	1-23movies.cc	https://w1.1-23movies.cc	104.21.13.82 172.67.198.212
7.	123tv.movie	https://123tv.movie	172.67.214.2 104.21.93.188
8.	123moviesh.to	https://123moviesh.to	104.21.70.96 172.67.222.123
9.	123movie.sh	https://ww33.123movie.sh	172.67.154.37





19.	2gomovies.ws	https://2gomovies.ws	194.145.208.168
	Defendant No. 6		
20.	2kmovie.cc	https://2kmovie.cc	162.159.137.85
			162.159.138.85
	Defendant No. 7		
21.	4filmyzilla.bar	https://ww2.4filmyzilla.bar	104.21.49.197
			172.67.166.204
	Defendant No. 8		
22.	bolly2tolly.eu	https://www.bolly2tolly.eu	172.67.223.114
			104.21.91.151
23.	oyomovies.com	http://oyomovies.com	104.21.21.10
			172.67.195.168
24.	bolly2tolly.net	https://www.bolly2tolly.net	104.21.29.70
			172.67.148.145
	Defendant No. 9		
25.	fboxtv.com	https://fboxtv.com	162.159.137.85
			162.159.138.85
	Defendant No. 10		
26.	filmyhit.pink	https://filmyhit.pink	104.21.51.33













55.	watchtheoffice.cc	https://watchtheoffice.cc	172.67.194.20
			104.21.20.189
	Defendant No. 34		
56.	xemovie.com	https://xemovie.com	172.64.130.9
			172.64.131.9

26. They shall do so within 24 hours of the receipt of the order. The defendants No.44 and 45 are directed to issue notifications calling upon the telecom service providers registered under them to disable access into India of the websites of defendants No.1 to 34 within 36 hours of the receipt of the order.

27. Provisions of Order XXXIX Rule 3 CPC be complied with.

28. List before the Joint Registrar on 10<sup>th</sup> May, 2022, for completion of service and pleadings.

29. The order be uploaded on the website forthwith.

**ASHA MENON, J.**

**FEBRUARY 21, 2022**

ck

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

I.A. NO. \_\_\_\_\_ OF 2024

IN

CS(COMM) NO. 116 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](mailto: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](mailto: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](mailto: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](mailto:legal@netflix.com)

- (5) Paramount Pictures Corporation  
 having its office at  
 5555 Melrose Avenue, Hollywood,  
 CA, 90038, United States of America,  
 Email: [CopyrightAgent@Paramount.com](mailto:CopyrightAgent@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](mailto:tips@disneyantipiracy.com)

... Plaintiffs

Versus

- (1) 123movieshub.tc  
 123moviesfree4u.com  
 0123movie.ru  
 123movieshindi.net  
 123movieshindi.com  
 1-23movies.cc  
 123tv.movie  
 123moviesh.to  
 123movie.sh  
 w-123movies.club  
 Contact information: [domreg@101domain.com](mailto:domreg@101domain.com),  
[dmca@123moviesfree4u.com](mailto:dmca@123moviesfree4u.com),  
[abuse@namecheap.com](mailto:abuse@namecheap.com),  
[ee072bc7ce44ea8b09b24d4cd9b1f11.protect@withheldforprivacy.com](mailto:ee072bc7ce44ea8b09b24d4cd9b1f11.protect@withheldforprivacy.com),  
[123movie.ru@gmail.com](mailto:123movie.ru@gmail.com),

abuse@instra.com, info@domain-contact.org,  
abuse@godaddy.com, abuse@porkbun.com

(2) putlocker-website.com

putlockernew.site

putlocker.ps

putlockers.llc

putlocker.gg

Contact information: abuse@namecheap.com,  
ee83f64524ce46039683905f6f8adabc.protect@withh  
eldforprivacy.com, info@todaynic.com,  
abuse@sarek.fi

(3) 0gomovies.ws

poppygreens.com

Contact Information: info@dynadot.com,

abuse@namecheap.com,

4898f281f033452e818e09e36cbacc4f.protect@withh  
eldforprivacy.com, domainabuse@tucows.com,  
support@paragonnames.com

(4) 1movieshd.com

Contact Information: <https://1movieshd.com/contact>

(5) 2gomovies.ws

Contact Information: support@directnic.com

(6) 2kmovie.cc

Contact Information: abuse@namecheap.com,  
eb04b777e3fc4156b1603f6082c3f9ee.protect@withh

eldforprivacy.com

(7) 4filmyzilla.bar

Contact Information: abuse@namecheap.com

(8) bolly2tolly.eu

oyomovies.com

bolly2tolly.net

Contact Information: support@porkbun.com,

abuse@name.com

(9) fboxtv.com

Contact Information: abuse@namecheap.com,

3b4da2c35f644b6db178d71ed9f444d5.protect@with

heldforprivacy.com

(10) filmyhit.pink

filmyhit.media

filmy.link

Contact Information: abuse@name.com

(11) flixhq.tv

Contact Information: abuse@namecheap.com,

f7e066fdbb2d4d53923b4a46c9329fa2.protect@withh

eldforprivacy.com

(12) fmovies.style

Contact Information: support@fmovies.style,

abuse@namecheap.com



- (13) freemoviesfull.com  
Contact Information: abuse@namecheap.com,  
59f94e8ab1d74899be52871812115f3d.protect@with  
heldforprivacy.com
- (14) gomoviefree.sc  
Contact Information: abuse@instra.com
- (15) goojara.to  
Contact Information: <https://supernova.to/sn/sitetalk>
- (16) hdtoday.tv  
Contact Information: <https://hdtoday.tv/contact>
- (17) jexmovie.com  
Contact Information: domainabuse@tucows.com
- (18) kdramahood.com  
Contact Information: abuse@godaddy.com
- (19) moviecrumbs.net  
Contact Information: abuse@regtons.com,  
moviecrumbs.net@whoisprotection.domains
- (20) moviesyify.online  
Contact Information:  
abuse@publicdomainregistry.com
- (21) openloadflix.com  
Contact Information: abuse@ionos.com,

dataprivacyprotected@ionos.de

(22) openloadmov.net

Contact Information: domainabuse@tucows.com

(23) pagalmovies.digital

pagalmovies.today

pagalmovies.art

Contact Information: pagalmovies123@gmail.com,  
abuse@namecheap.com

(24) playdesi.net

playdesi.tv

Contact Information: abuse@name.com

(25) seriestv.watch

Contact Information: abuse@namecheap.com

(26) spacemov.site

spacemov.ws

Contact Information: abuse@namesilo.com

(27) tvshows88.com

Contact Information: tvshows88@gmail.com, tld-  
abuse@nic.ru, darksolar.team@gmail.com

(28) watchfilm.net

Contact Information: abuse@porkbun.com

(29) watchmovieshd.ru

Contact Information: watchmovieshd@gmail.com

(30) watchseries.ma

Contact Information: whois@njal.la,  
h.aboulfeth@genious.net

(31) watchserieshd.stream

Contact Information:  
watchserieshdstream@gmail.com,  
abuse@namecheap.com

(32) watchseriesstream.com

Contact Information: abuse@namecheap.com,  
70c8fe8878af44ed9aaae5ae30f6ce21.protect@withheldforprivacy.com

(33) watchtheoffice.cc

Contact Information: abuse@namecheap.com,  
85d1fa6d1e804e76864d9c5a8c65b449.protect@withheldforprivacy.com

(34) xemovie.com

Contact Information: abuse@namecheap.com,  
00c697b90a0145f6ad24c5424d9af234.protect@withheldforprivacy.com

(35) Atria Convergence Technologies Pvt. Ltd.

99A/113A, Manorayana Palya  
R.T. Nagar Bangalore – 560032

Also At:

2<sup>nd</sup> and 3<sup>rd</sup> Floor, No. 1,  
Indian Express Building, Queen's Road,  
Bangalore 560001 Karnataka  
nodal.term@actcorp.in;  
Jitesh.chathambil@actcorp.in

- (36) Bharat Sanchar Nigam Ltd.  
Bharat Sanchar Bhawan, Regulation Cell  
5th floor, Harish Chandra Mathur Lane  
Janpath, New Delhi -110001  
ddg\_reg@bsnl.co.in; sbkhare@bsnl.co.in  
averma@bsnl.co.in; sushmamishra71@gmail.com
- (37) Bharti Airtel Ltd.  
Airtel Centre, Tower-A, 6<sup>th</sup> floor  
'A' Wing, Plot No.16, Udyog Vihar  
Ph - IV, Gurgaon – 122016  
121@in.airtel.com; compliance.officer@bharti.in;  
jyoti.pawar@in.airtel.com ; Ravi.gandhi@airtel.com;  
amit.bhatia@airtel.com
- (38) Hathway Cable & Datacom Pvt. Ltd.  
'Rahejas',4 floor, Main Avenue  
Santacruz (W), Mumbai-400054  
ajay.singh@hathway.net;  
Sudhir.shetye@hathway.net
- (39) Mahanagar Telephone Nigam Ltd.  
5th Floor, Mahanagar Doorsanchar Sadan

9, CGO Complex, Lodhi Road  
New Delhi – 110003  
raco.mtnl@gmail.com; mtnlcsco@gmail.com  
gmracomtnl@gmail.com

- (40) Reliance Jio Infocomm Limited  
RCP 14 (TC 23), Phase 4,  
B-Block , 3rd Floor,  
C 4 130 Twane- belapur Road,  
Gansoli,  
Navi Mumbai- 400701  
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

- (41) Shyam Spectra Pvt. Ltd.  
Plot No. 258,  
Okhla Industrial Estate, Phase III,  
New Delhi – 110020

Also at:

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

- (42) Tata Teleservices Ltd.  
A, E & F Blocks  
Voltas Premises - T. B. Kadam Marg  
Chinchpokli, Mumbai – 400033

pravin.jogani@tatatel.co.in;  
anand.dalal@tatatel.co.in; satya.yadav@tatatel.co.in

- (43) Vodafone India Limited  
Vodafone House,  
Peninsula Corporate Park,  
Ganpatrao Kadam Marg,  
Lower Parel, Mumbai - 400 013 India

Also At:

Birla Centurion,  
10th Floor, Plot no.794,  
B Wing, Pandurang Budhkar Marg,  
Worli, Mumbai - 400 030 India  
smitha.menon@vodafoneidea.com;  
pankaj.kapdeo@vodafoneidea.com  
Radhika.gokhale@vodafoneidea.com;  
sheena.thukral@vodafoneidea.com;  
sanjeet.sarkar@vodafoneidea.com;  
lavati.sairam@vodafoneindia.com

- (44) Department of Telecommunications  
Through Secretary,  
Ministry of Communications and IT,  
20, Sanchar Bhawan, Ashoka Road,  
New Delhi – 110001  
secy-dot@nic.in, dirids2-dot@nic.in, adetds2-  
dot@gov.in

- (45) 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  
cyberlaw-legal@meity.gov.in

(46) Ashok Kumars

(47) hdtoday.cc

Contact information: abuse@sarek.fi

(48) freemoviesfull.cc

Contact information: abuse@namecheap.com;  
67ecd4490a834b75b001731c21c5fbd6.protect@with  
heldforprivacy.com

(49) filmyhit.makeup

Contact information: jrupp@name.com

(50) filmy.gives

Contact information: abuse@namecheap.com

(51) filmy-hit.network

Contact information: abuse@name.com

(52) filmyhit.hair

Contact information: admin@filmyhit.com,  
abuse@namecheap.com

(53) filmyhit.press

Contact information: admin@filmyhit.com,  
abuse@namecheap.com

(54) filmyhit.com

Contact information: abuse@name.com

(55) watchserieshd.pro

Contact Information: abuse@namecheap.com

(56) watchserieshd.live

Contact Information: [abuse@namecheap.com](mailto:abuse@namecheap.com)

(57) bolly2tolly.love

Contact Information: [tech@porkbun.com](mailto:tech@porkbun.com)

(58) hdtoday.se

Contact Information: noc@cloudflare.com

(59) watchseries.mx

Contact Information: abuse@namecheap.com

(60) watchseries.im

Contact Information: info@nic.in

(61) watchmovieshd.bz

Contact Information: noc@cloudflare.com,  
abuse+law@cloudflare.com

(62) watchseries.cyou

Contact Information: [abuse@namecheap.com](mailto:abuse@namecheap.com)



- (63) hdtodaytv.nl  
Contact Information: [abuse@namecheap.com](mailto:abuse@namecheap.com)
- (64) hdtoday.to  
Contact Information: [noc@cloudflare.com](mailto:noc@cloudflare.com),  
[abuse+law@cloudflare.com](mailto:abuse+law@cloudflare.com)
- (65) flixhq.ws  
Contact Information: [noc@cloudflare.com](mailto:noc@cloudflare.com),  
[abuse+law@cloudflare.com](mailto:abuse+law@cloudflare.com)
- (66) flixhq.click  
Contact Information: [domainabuse@tucows.com](mailto:domainabuse@tucows.com)
- (67) hdtodaytv.click  
Contact Information: [abuse@namecheap.com](mailto:abuse@namecheap.com)
- (68) hdtodaytv.fun  
Contact Information: [abuse@namecheap.com](mailto:abuse@namecheap.com)
- (69) hdtoday.city  
Contact Information: [abuse@namecheap.com](mailto:abuse@namecheap.com)
- (70) Movieswatch.xyz  
Contact Information: [abuse@namesilo.com](mailto:abuse@namesilo.com)
- (71) watchseries.lol  
Contact Information: [abuse@namecheap.com](mailto:abuse@namecheap.com)

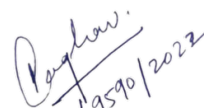
(72) watchseries.llc

Contact Information: [abuse@namecheap.com](mailto:abuse@namecheap.com)

...Defendants

Place: New Delhi

Date: 04<sup>th</sup> December 2024



Raghav Goyal  
(D/9590/2022)

Saikrishna & Associates  
Advocates for Plaintiffs

57, Jor Bagh, Delhi – 110003

+91 9205464387

[raghav@saikrishnaassociates.com](mailto:raghav@saikrishnaassociates.com)

**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.