813-7/25/2024-DS-Part(1) 1/3233765/2024

**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- 55/2022-DS-II

Dated:16-12-2024

To.

All Internet Service Licensees

Subject: C.S. (COMM) No. 851 of 2022, Universal City Studios LLC & Ors. v. Dembed2.com & Ors. Before Hon'ble Delhi High Court.

Kindly refer to the following:

- i. Hon'ble Delhi High Court order dated **03.12.2024** on the subject.
- ii. Para 27 & 28 of Hon'ble Delhi High Court order dated12.12.2022 regarding blocking of websites identified by plaintiff.
- iii. Memo of Parties in CS (Comm) No. 851 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 defendants no. **55-66.** 

Digitally signed by Shashi Kumar

Date: 16-12-2024 10:06:35

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. Sh. Asheesh Jain, CGSC (asheeshjain.cgsc@outlook.com) for kind information.
- iii. Mehr Sidhu (mehr@saikrishnaassociates.com), Plaintiff Advocate for kind information. [Requested to take action as per Annexure].
- iv. IT wing, DoT for uploading on DoT Website please.





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

+ CS(COMM) 851/2022

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

Through: Ms. Priyanka Jaiswal, Ms. Mehr

Sidhu, Mr. Raghav Goyal,

Advocates

versus

DEMBED2.COM & ORS.

....Defendant

Through: None

CORAM: JOINT REGISTRAR (JUDICIAL) Dr. AJAY GULATI

% ORDER 03.12.2024

IA. No. 46969/2024 on behalf of plaintiffs under Order I Rule 10 CPC seeking impleadment of additional mirrors, redirects, or alphanumeric variations as defendants no. 55 to 66 in the memo of parties.

- 1. The plaintiff is seeking to implead additional rogue-websites as defendant nos. 55 to 66 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. 55 to 66.
- 2. The amended memo filed alongwith this IA is taken on record. Steps be taken to serve the newly impleaded defendants within a week through the electronic mode only.
- 3. The order blocking the rogue-websites passed by the





Hon'ble Court on **12.12.2022** shall operate qua the freshly impleaded defendants as well in terms of directions contained in para 25 to 28 of the order dated 12.12.2022. 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





\$~29

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

+ CS(COMM) 851/2022 & I.A. 20682/2022(O-XXXIX R-1& 2 of CPC), I.A. 20683/2022(u/s 151 CPC), I.A. 20684/2022(u/S 80 r/w u/s 151 CPC)

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

Through: Mr.Saikrishna Rajagopal,

Mr.Siddharth Chopra, Ms.Suhasini Raina, Ms.R.Ramya, Mr.Samidhya Rao and Ms.Meher Sidhu, Advocates.

versus

DEMBED2.COM & ORS. ..... Defendants

Through: None

**CORAM:** 

HON'BLE MR. JUSTICE AMIT BANSAL

ORDER 12.12.2022

**%** 

# I.A. No. 20683/2022 (for exemption from filing certified copies, etc.)

- 1. Subject to plaintiffs filing the original/certified copies and legible copies of any document on which the plaintiff may seek to place reliance, within four weeks from today, exemption is granted for the present.
- 2. The application stands disposed of.

# I.A. No. 20684 of 2022 (for exemption from serving advance notice)

- 3. The present application has been filed on behalf of the plaintiffs seeking exemption from advance service to the defendants.
- 4. In view of the urgent *ex parte* relief sought by the plaintiffs, the application is allowed.





#### **CS(COMM) 851 of 2022**

- 5. Let the plaint be registered as a suit.
- 6. Summons be issued to the defendants through all permissible modes. The summons shall state that the written statements shall be filed by the defendants within thirty days from the date of the receipt of summons. Along with the written statement, the defendants shall also file an affidavit of admission/denial of the documents of the plaintiffs, without which the written statements shall not be taken on record
- 7. Liberty is given to the plaintiffs to file replications, if any, within thirty days from the receipt of the written statements. Along with the replication filed by the plaintiffs, an affidavit of admission/denial of the documents of the defendants, be filed by the plaintiffs.
- 8. The parties shall file all original documents in support of their respective claims along with their respective pleadings. In case parties are placing reliance on a document, which is not in their power and possession, its detail and source shall be mentioned in the list of reliance, which shall be also filed with the pleadings.
- 9. If any of the parties wish to seek inspection of any documents, the same shall be sought and given within the timelines.
- 10. List before the Joint Registrar on 6<sup>th</sup> February, 2023.
- 11. List before the Court on 16<sup>th</sup> March, 2023.

# IA No. 20682/2022 (O.XXXIX R.1 & 2 of CPC)

12. The present suit has been filed for permanent injunction, rendition of accounts and damages for the infringement of exclusive rights in the plaintiffs' original content/work, which is protected under the Copyright Act, 1957, against the defendants no. 1 to 12 with additional domains, that are





rogue websites and substantially indulge in online piracy by making original content available for download and otherwise providing access to infringing and illegal content.

- 13. The plaintiffs no. 1-6, i.e., Universal City Studios LLC, Warner Bros. Entertainment Inc., Columbia Picture Industries Inc., Netflix Studios LLC., Paramount Pictures Corporation and Disney Enterprises Inc. are leading entertainment companies globally known for producing films such as Mulan, Lego Batman, Finding Nemo, Finding Dory etc. The plaintiffs have exclusive rights to communicate their content to the public.
- 14. It is contended that the defendants no. 1 to 12's websites ("defendant website") are online locations, which enable the 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 the defendants' websites has been provided in paragraph 30 of the plaint.
- 15. In order to protect and enforce their exclusive rights, the plaintiffs investigated and monitored the defendants' websites and gathered evidence of their infringing activities, which has been filed along with the suit. Evidence collected by the investigator also shows that the operators of the defendant's websites are using known "pirate branding" to signal users that the





defendants' websites are merely new iterations of the sites that have been blocked earlier. Therefore, the defendants' websites being in the form of new iterations and that the new iterations almost invariably have the same functionality and purpose as the earlier blocked sites.

- 16. It is further contended 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 the plaintiffs' original content. It is also contended that the access to many of the defendants' websites has been previously disabled in other jurisdictions, as elaborated in paragraph 37 of the plaint.
- 17. In light of the above, it is contended that the defendants no. 1 to 12 are liable for infringement of the plaintiffs' copyright works 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, the hosting, streaming, reproducing, distributing, making available to the public, and/or communicating to the public of the original content for streaming and downloading, or facilitating the same without authorization of the plaintiffs. In support of the aforesaid contention, the 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. It is further contended by the plaintiffs' counsel that the websites of the defendants no. 1-12 are anonymous in nature and the information provided in the public domain regarding the owners of the website is either incomplete, incorrect and/or protected behind a veil of secrecy. These websites of the defendants no.1-12 hide behind domain privacy services





offered by various domain name Registrars, which enable a website owner to hide behind a veil and not disclose any contact details publicly, to protect his privacy.

- 19. In order to overcome this, the plaintiffs have arrayed various internet and telecom services providers (ISPs) as defendants no. 13-21 (hereinafter referred as "the said ISPs"), DoT as defendant no. 22 and MEITY as defendant no. 23 in the present suit to ensure effective implementation of orders passed by this Court.
- 20. Issue notice.
- 21. Notice be issued to the defendants through all modes.
- 22. Reply(ies) be filed within four weeks.
- 23. Rejoinder(s) thereto, if any, be filed within two weeks thereafter.
- 24. In view of the averments noted hereinabove and in view of the judgment passed in *UTV Software Communication Ltd.* (*supra*), this Court is of the opinion that a *prima facie* case is made out in favour of the plaintiffs and balance of convenience is also in their favour. Further, irreparable harm or injury would be caused to the plaintiffs if an interim injunction order is not passed.
- 25. Accordingly, the defendants no. 1 to 12 (and any such other mirror/redirect/alphanumeric website, which appears to be associated with any of the defendants' websites based on its name, branding or the identity of its operator, or discovered to provide additional means of accessing the defendants' 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

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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.

- 26. The defendants no. 13 to 21 shall ensure compliance with this order by blocking websites of the defendants no. 1 to 12, their URLs and the respective IP addresses as filed along with the suit (Page 21-24 Vol 1 of the plaintiffs' documents and also Annexed herewith as Annexure -A).
- 27. The defendants no. 22 and 23 are further directed to take immediate steps and issue requisite notifications within five working days, calling upon various internet and telecom service providers registered under them to block the aforementioned websites identified by the plaintiffs.
- 28. 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 I Rule 10 of the Code of Civil Procedure, 1908 (CPC) for impleadment of such websites, the plaintiffs shall file an affidavit confirming that the newly impleaded website is mirror/redirect/alphanumeric website, which appears to be associated with any of the defendants' websites based on its name, branding or the identity of its operator, or has been discovered to provide additional means of accessing the defendants' websites and other domains/domain along with their subdomains and subdirectories, owners/website operators/entities, which are

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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 appropriate directions to the ISPs.

- 29. Compliance under Order XXXIX Rule 3 of the CPC be done within five days from today.
- 30. List before Joint Registrar on 6<sup>th</sup> February, 2023.
- 31. List before Court on 16<sup>th</sup> March, 2023.

AMIT BANSAL, J

**DECEMBER 12, 2022** 

sr





# Annexure-A

# **LIST OF WEBSITES**

S.No.	Domain Name	URL	IP Address			
Defendant No. 1						
1.	dembed2.com	https://dembed2.com	104.26.14.20 104.26.15.20 172.67.72.130			
Defendant No. 2						
2.	bollyflix.day	https://bollyflix.day	104.21.28.33 172.67.170.58			
3.	bollyflix.cyou	https://bollyflix.cyou	172.64.192.33 172.64.193.33			
4.	bollyflix.vip	https://bollyflix.vip	172.67.219.153 104.21.24.162			
Defendant No. 3						
5.	divicast.com	https://divicast.com	172.67.134.91 104.21.25.157			
Defendant No. 4						
6.	Gogohd.net	https://gogohd.net	172.67.68.129 172.67.68.129 104.26.13.233			
7.	Goload.io	http://goload.io	104.26.0.4 104.26.1.4 172.67.68.229			
Defendant No. 5						
8.	kuttymovies.mon ster	https://kuttymovies.monster	172.67.208.93			
			104.21.45.34			





9.	kuttymovies24.co m	http://kuttymovies24.com	104.21.17.116			
			172.67.175.200			
10.	kuttymovies24.or	https://kuttymovies24.org	172.67.177.74			
	g		172.67.177.74			
Defendant No. 6						
11.	movie4me.store	https://movie4me.store	104.21.29.75			
			172.67.148.150			
12.	movie4me.bond	https://movie4me.store	104.21.80.118			
			172.67.180.132			
13.	movies4me.one	http://movies4me.one	104.21.25.66			
			172.67.223.109			
Defend	Defendant No. 7					
14.	moviesmint.in	http://moviesmint.in	104.21.30.39			
			172.67.150.134			
Defendant No. 8						
15.	moviezwap.vin	https://moviezwap.vin	104.21.52.130			
			172.67.199.137			
16.	moviezwap.run	https://moviezwap.run	104.21.74.119			
17.	moviezwap.pics	https://moviezwap.pics	172.67.157.244 172.67.174.17			
1/.			104.21.80.42			
Defendant No. 9						





18.	prmovies.run	prmovies.run	104.21.4.96		
19.	prmovies.team	https://prmovies.team	172.67.159.85		
			104.21.89.125		
20.	prmovies.tel	https://prmovies.tel	172.67.191.119		
			104.21.65.184		
Defendant No. 10					
21.	serieshd.watch	https://serieshd.watch	172.67.209.29		
			104.21.69.141		
Defendant No. 11					
22.	tamilprint.art	http://tamilprint.art	172.67.144.12		
			104.21.28.35		
23.	tamilprint22.xyz	https://tamilprint22.xyz	104.21.32.75		
			172.67.184.102		
Defendant No. 12					
24.	uhdmovies.site	https://uhdmovies.site/movi	172.67128.24		
25.	uhdmovies.co	https://uhdmovies.co	172.67.167.37		
			104.21.42.226		
26.	uhdmovies.app	http://uhdmovies.app	104.21.44.147 172.67.200.226		
			1/2.0/.200.220		

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

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

IN

CS(COMM) NO. 851 OF 2022

IN THE MATTER OF

Universal City Studios LLC. & Ors.

...Plaintiffs

Versus

dembed2.com & Ors.

...Defendants

#### **MEMO OF PARTIES**

(1) Universal City Studios LLC.

having its office at

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. dembed2.com

Contact information: abuse@namecheap.com, c1958a482f66492ba5666f69a9db0d40.protect@withh eldforprivacy.com

### 2. bollyflix.day

bollyflix.cyou

bollyflix.vip

Contact information: bollyflix@protonmail.com, abuse@namecheap.com

#### 3. divicast.com

Contact Information: abuse@namecheap.com,

#### 4. gogohd.net

goload.io

Contact Information: abuse@namecheap.com, ebfec9e6db64483dbc5f0d4302a9e9fe.protect@withhel dforprivacy.com

#### 5. kuttymovies.monster

kuttymovies24.com

kuttymovies24.org

Contact Information: abuse@namecheap.com, 868d5108e6ec45a8b3fd4581b20bf326.protect@withh eldforprivacy.com

#### 6. movie4me.store

Movie4me.bond

movies4me.one

Contact Information: movie4me2@protonmail.com, abuse@namecheap.com

#### 7. moviesmint.in

Contact Information: - Bone111@protonmail.com

8. moviezwap.vin moviezwap.run moviezwap.pics

Contact Information: moviezwaphd@protonmail.com, abuse@nameheap.com

9. prmovies.run prmovies.team

Prmovies.tel

Contact Information: abuse@namecheap.com, compliance@tucows.com

10. serieshd.watchContact Information: domainabuse@tucows.com

11. tamilprint.art tamilprint22.xyz

Contact Information: abuse@namecheap.com

12. uhdmovies.site uhdmovies.co uhdmovies.app

Contact information: abuse@godaddy.com

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

14. 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

15. Bharti Airtel Ltd.

Airtel Centre, Tower-A, 6th 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

- 16. Hathway Cable & Datacom Pvt. Ltd.
  'Rahejas',4 floor, Main Avenue
  Santacruz (W), Mumbai-400054
  ajay.singh@hathway.net;
  Sudhir.shetye@hathway.net
- 17. 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
- 18. 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; rudraksha.sinha@ril.com

19. 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

info@spectra.co; compliance@spectra.co

20. Tata Teleservices Ltd.

A, E & F Blocks

Voltas Premises - T. B. Kadam Marg

Chinchpokli, Mumbai – 400033

Also at:

Jeevan Bharati Tower I.

10<sup>th</sup> Floor, 124,

Connaught Circus,

New Delhi - 110001

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

satya.yadav@tatatel.co.in; gaganjit.sidhu@tatatel.co.in

21. 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
lavati.sairam@vodafoneidea.com

- Department of Telecommunications
  Through Secretary,
  Ministry of Communications and IT,
  20, Sanchar Bhawan, Ashoka Road,
  New Delhi 110001
  secy-dot@nic.in, dirds2-dot@nic.in,
- 23. Ministry of Electronics and Information Technology Through the Director General (DIT) Cyber Laws & esecurity), Electronics Niketan, 6, CGO Complex, Lodi Road, New Delhi – 110003 cyberlaw-legal@meity.gov.in
- 24. Ashok Kumars
- 25. Moviesmod.net

Contact	Information	:	abuse@namecheap.com
db7402c5	503aa4770b4a	8d1	c7b093c000.protect@withh
eldforpri	vacy.com		

- 26. Plexmovies.xyz
  - Contact Information : abuse@namecheap.com
- 27. Moviezverse.org
  - Contact Information: abuse@namecheap.com
- 28. uhdmovies.one
  Contact Information: abuse@namecheap.com
- 29. uhdmovies.vip
  - Contact Information: abuse@cloudflare.com
- 30. uhdmovies.world
  - Contact Information:abuse@namecheap.com
- 31. uhdmovies.org.in
  - Contact Information: abuse@godaddy.com
- 32. prmovies.city
  - Contact Information: abuse@namecheap.com
- 33. prmovies.bio
  - Contact Information: abuse@namecheap.com
- 34. prmovies.help
  - Contact Information: abuse@namecheap.com
- 35. prmovies.vin
  - Contact Information: abuse@namecheap.com
- 36. moviesmint.net
  - Contact Information: abuse@dynadot.com, bone111@protonmail.com
- 37. Uhdmovies.bio

Contact Information: abuse@namecheap.com

# 38. bollyflix.tax

Contact Information: bollyflix@protonmail.com, abuse@namecheap.com

39. bollyflix.kim

Contact Information: abuse@namecheap.com

40. bollyflix.cool

Contact Information: abuse@namecheap.com

- 41. kuttymovies.it.com
  Contact Information: marketing@netim.com
- 42. kuttymovies1.com

Contact Information: abuse@namecheap.com, 0947cce9617d484e9b469cefad0d0792.protect@withh eldforprivacy.com

- 43. uhdmovies.run
  Contact Information: abuse@namecheap.com
- 44. uhdmovies.asia
  Contact Information: abuse@namecheap.com
- 45. uhdmovies.zip
  Contact Information: abuse@namecheap.com
- 46. prmovies.rent
  Contact Information: abuse@namecheap.com
- 47. prnmovies.loan
  Contact Information: abuse@namecheap.com
- 48. prnmovies.fan
  Contact Information: abuse@namecheap.com
- 49. kuttymovies.com.bz
  Contact Information: abuse@cloudflare.com
- 50. kuttymovies.mex.com
  Contact Information: abuse-contact@sav.com

- 51. kuttymovies.gr.com
  Contact Information: abuse@namecheap.com
- 52. moviezwap.bid
  Contact Information: abuse@namesilo.com
- 53. moviezwap.hair
  Contact Information: abuse@namesilo.com
- 54. moviezwap.cyou
  Contact Information: abuse@namesilo.com
- 55. bollyflix.fi
  Contact Information: bollyflix@protonmail.com,
  abuse@cloudflare.com, legal@cloudlfare.com
- 56. bollyflix.ninja
  Contact Information: domainabuse@tucows.com
- 57. bollyflix.how
  Contact Information: domainabuse@tucows.com
- 58. bollyflix.to
  Contact Information: abuse@cloudflare.com,
  legal@cloudlfare.com
- 59. bollyflix.review
  Contact Information: abuse@namecheap.com
- 60. bollyflix.band Contact Information: domainabuse@tucows.com
- 61. bollyflix.city
  Contact Information: domainabuse@tucows.com
- 62. bollyflix.cash
  Contact Information: domainabuse@tucows.com

- 63. prmovies.pw
  Contact Information: abuse@namecheap.com
- 64. prnmovies.agency
  Contact Information: abuse@namecheap.com
- 65. uhdmovies.icu
  Contact Information: domainabuse@tucows.com
- 66. uhdmovies.dad Contact Information: domainabuse@tucows.com

Place: New Delhi

Date: 29th November, 2024

Mehr Sidhu
(PH/2695/2021)
Saikrishna & Associates
Advocates for the Plaintiffs
57, Jor Bagh, Delhi – 110003
+91 8879106222
mehr@saikrishnaassociates.com

#### **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.