

**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-39/2024-DS-II**

**Dated:06-11-2024**

**To,**

All Internet Service Licensee

**Subject: CS (COMM) 855 of 2024: Gameskraft Technologies Private Limited & Anr. v. John Doe & Ors. before the High Court of Delhi**

Kindly find the enclosed Hon'ble Delhi High Court order dated **01.10.2024** on the subject matter.

2. Please refer to the **para 41.8** of the said court order in respect of blocking of **websites** enumerated in the **para 41.5**.
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

Ram Kailash Meena

Date: 06-11-2024 15:32:01

**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. Apoorv Upmanyu < aupmanyu@mlo.co.in> Plaintiff Advocate for kind information.
  - a. Take action as per Annexure.
- iii. IT wing of DoT for uploading on DoT websites please.





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

+ **CS(COMM) 855/2024 & I.A. Nos. 41000-41002/2024**

**GAMESKRAFT TECHNOLOGIES PRIVATE LIMITED &  
ANR.**

.....Plaintiffs

Through: Mr. Sandeep Sethi, Senior Advocate  
with Mr. Arun Sri Kumar and  
Mr. Abhyudaya Shishodia,  
Advocates.

(M): 9829524580

Email: abhyudaya.shishodia@keystone.law

versus

**JOHN DOE & ORS.**

.....Defendants

Through: Mr. Neel Mason with Ms. Ekta  
Sharma and Ms. Pragya Jain,  
Advocates for defendant no. 29.

(M): 9461588999

Mr. Arjun Mahajan, Senior Panel  
counsel with Mr. Apoorv Upamanyu  
and Ms. Jahnvi Singh, Advocates for  
defendant nos. 30 and 31.

(M): 9899215738

Mr. Rishav Dubey, Govt. Pleader for  
respondent no. 30/Department of  
Telecommunication.

**CORAM:**

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

**ORDER**

**01.10.2024**

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**I.A. No. 41001/2024 (Exemption from filing original copies of documents)**

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



Procedure, 1908 (“CPC”), on behalf of the plaintiffs, seeking exemption from filing originals of documents and true typed copies of dim/unclear/illegible documents or documents with small font size.

2. Exemption is granted, subject to all just exceptions.
3. Applicant shall file legible, clear, and translated copies of the documents, on which the plaintiffs may seek to place reliance, before the next date of hearing.
4. Accordingly, the present application is disposed of.

**I.A. No. 41002/2024 (Exemption from filing legal proceedings certificate)**

5. The present is an application under Section 151 CPC seeking exemption from filing legal proceedings certificate (“LPCs”) in respect of the registered marks relied upon by the plaintiffs in the present petition.

6. It is submitted that the plaintiffs have initiated the process of obtaining the LPCs, therefore, the plaintiffs undertake to file the same within a period as indicated by this Court.

7. In view of the undertaking the plaintiffs shall file the relevant LPCs, within a period of six weeks from today.

8. Accordingly, the application is allowed in the aforesaid terms.

**CS(COMM) 855/2024**

9. Learned Senior Counsel appearing for the plaintiffs submits that the known defendants have already been served. He further submits that since the present case pertains to the various unknown persons, who are indulging in trademark and copyright infringement and passing off of the plaintiffs’ marks, therefore, no purpose would be served by sending the parties for Pre-



Litigation Mediation. Thus, he submits that exemption from Pre-Litigation Mediation be granted. Considering the submissions made before this Court, exemption is so granted.

10. Accordingly, let the plaint be registered as suit.

11. Issue summons.

12. Summons is accepted by learned counsels appearing for defendant nos. 29, 30 and 31.

13. 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 plaintiffs' documents, without which, the written statement shall not be taken on record.

14. Liberty is given to the plaintiffs 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 plaintiffs, an affidavit of admission/denial of documents of the defendants, be filed by the plaintiffs, 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.

15. List before the Joint Registrar (Judicial) for marking of exhibits, on 20<sup>th</sup> November, 2024.

16. List before the Court on 27<sup>th</sup> January, 2025.

**I.A. No. 41000/2024 (Application under Order XXXIX Rules 1 and 2 CPC)**

17. The present suit has been filed for permanent injunction restraining



trademark infringement, copyright infringement, passing off, acts of unfair competition, seeking takedown of infringing websites, damages/rendition of accounts and other reliefs.

18. Learned counsel appearing for the plaintiffs submits that the plaintiff no. 1 (including its group of companies), is one of India's first gaming companies to build an ISO 9001:2015 certified platform. Since its inception in 2017, the plaintiff no.1 and its affiliates have catered to a growing group of skill-based players within the online gaming community and resultantly the companies within the group are now amongst the country's most recognized online skill-based gaming companies, home to immensely popular, widely known and recognized platforms, i.e., *Rummyculture*, *Playship Rummy*, *Pocket52*, *RummyPrime*, *Ludo Culture* and *RummyTime*.

19. It is submitted that the plaintiffs use numerous trademarks on and in connection with their online gaming platforms. These include the marks "Rummyculture", "Gameskraft", "Culture of Champions", "Rummytime",



and marks that incorporate one or more of plaintiffs' marks.

20. It is further submitted that plaintiff no. 1's combined usage of the terms "Rummy" and "Culture" is entirely unique and distinctive, and quite



unlike any other product names in the online gaming industry. In fact, plaintiff no.1 has employed this naming convention/terminology in its others marks and platforms as well, such as “Ludo Culture” and “Culture of Champions”. Thus, the combination of words “Rummy” and “Culture” lends plaintiff no.1’s Website a high degree of distinctiveness, such that any combination of the two words in a domain name or App name would be directly associated with the plaintiff no. 1.

21. It is further submitted that the home page and other pages of the plaintiffs’ above websites each feature a distinctive layout that is unique and original to the two plaintiffs. The plaintiffs enjoy a copyright in the look and feel of these websites, as well as the literary, pictorial and video content accessible on these websites in the form of terms of service and other written content. The plaintiffs’ websites expressly stipulate that the copyright in these websites belongs to the plaintiffs. The plaintiffs are the authors of all the material appearing on their respective websites, and all the material are their original works of authorship.

22. It is submitted that the plaintiffs’ marks are inherently distinctive and entitled to the highest degree of protection under the Trade Marks Act, 1999. The plaintiffs have already received registration certificates in respect about 50 marks within just a few years of their operation.

23. It is further submitted that one or more of the plaintiffs’ marks are used as the plaintiffs’ corporate logos and as trade marks on their various online gaming websites including, [www.rummyculture.com](http://www.rummyculture.com) and [www.rummytime.com](http://www.rummytime.com), on their advertising and marketing materials, on their social media pages, on their mobile applications/computer software, and in many other ways. The plaintiffs’ marks are well renowned as



identifying their offerings and services, and are associated exclusively with the plaintiffs in the mind of the public.

24. It is submitted that plaintiff no. 1 registered the domain names “rummyculture.com” and “gameskraft.com”, in the years 2017 and 2018, respectively. Since its inception, these domain names have been used as active websites on which one or more of the plaintiffs’ marks are prominently displayed along with access to plaintiff no. 1’s “Rummyculture” application (App)-which is a platform for online games of rummy. Further, plaintiff no.2 also operates its website “rummytime.com” to provide information about, and to provide access to download its “Rummytime” App.

25. It is submitted that in April 2024, the plaintiffs became aware of defendant no. 1’s website (<https://culture.rummyonline24.com>), which was found to be replicating plaintiff no.1’s website ([www.rummyculture.com](http://www.rummyculture.com)). A closer inspection of the infringing website, specifically the “About Us” page (available at <https://culture.mummyonline24.com/about-us/>), suggested that one “TopRummy” is its owner. Upon further-enquiries, it was found that the name “TopRummy” is nearly identical to the trading name of another entity, i.e., “TopRummyApp”.

26. It is further submitted that thereafter, in August 2024, the plaintiffs were further able to identify various websites (owned and/or published by defendant nos. 2-12) which were hosting infringing content and falsely purporting to associate with the plaintiffs. At the same time, the plaintiffs also found that a Google search for key components of the plaintiffs’ word marks would produce unwanted results, including, spam and government websites using the “gov.in” domain name that do not host any content





related to the said search terms, such as [“https://rule3.cept.gov.in/casino%20what%20is%20rummy%20acount%20in%20hindi.phtml”](https://rule3.cept.gov.in/casino%20what%20is%20rummy%20acount%20in%20hindi.phtml), [“https://dlrs.bihar.gov.in/hots-old-rummy-culture-v-9-34.aspx”](https://dlrs.bihar.gov.in/hots-old-rummy-culture-v-9-34.aspx), <https://dlrs.bihar.gov.in/hots-top-gambling-websites-sports-v-0-0-0/CitizenContactUs.html> and [“https://prodauatsts.telangana.gov.in/rummy-rummy-cultureaddress-856.html”](https://prodauatsts.telangana.gov.in/rummy-rummy-cultureaddress-856.html).

27. It is submitted that defendant no. 1 owns and/or operates the website [“https://culture.rummyonline24.com”](https://culture.rummyonline24.com) which blatantly copies the website [“www.rummyculture.com”](http://www.rummyculture.com) and falsely seeks to pass itself off as the website and services of plaintiff no. 1. Through its website, defendant no. 1 appears to provide a link to the Rummyculture App which is deliberately and misleadingly called “TopRummy” app – however, no such “TopRummy” app is available on the Google Play Store or the Apple App Store. Further, the link available on the said website downloads a file which in turn installs a third party app called “RummyCulture” bearing striking resemblance to plaintiff no. 1’s platform.

28. It is further submitted that the defendant no. 2 whose name/identity is not known to the plaintiffs is the operator of the domain name [“rummyculture.xyz”](http://www.rummyculture.xyz), and/or the owner of the website located at [www.rummyculture.xyz](http://www.rummyculture.xyz), which is evidently a deceptive iteration of plaintiff no.1’s website and its domain name. Furthermore, defendant no. 3 has been impleaded as the owner/operator of the website [“www.indorummy.com”](http://www.indorummy.com) which falsely represents itself to be the operator of several platforms owned by the plaintiffs (and other group companies), i.e., *Rummy Culture*, *Rummy Time*, *Playship Rummy* and *Rummy Prime*. Similarly, defendant no. 4 has



been impleaded as the owner/operator of the website “<https://rummyculture-apk.com/>” which falsely represents itself to be the operator of the *Rummy Culture* platform. Defendant no. 5 on the other hand hosts unauthorized and unverified information about the Rummyculture App on its webpage “<https://apkfull.com/rummy-culture-rummy-cash-game/com.gameskraft.rummycultureplay>”, and appears to provide a link to download the said App. Defendant no. 6 is yet another such unidentified entity which purports to offer an app called Rummy Game through its webpage “<https://apkpure.com/rummy-game-play-rummy-online/com.gameskraft.rummyculturelite>” while dishonestly displaying the plaintiffs’ marks as its logo and plaintiff no. 1’s name as the owner.

29. It is further submitted that due to the unique and peculiar nature of rogue websites, privacy and/or anonymity of their registrants, the unstructured nature of the Internet, and the ease with which detection can be avoided on the Internet by shadowy operators who are indulging in impersonation/infringement/ cyber-crimes, the plaintiffs are compelled to initiate the present suit proceedings against the defendants’ rogue websites using their URL/domain names only, as the owners’ identities are not known at the time of the institution of the suit. It is submitted that it is impossible to locate the owners of such websites and their full particulars.

30. It is submitted that in the present case, the defendants’ rogue websites mislead the members of public into falsely believing that these websites are associated with the plaintiffs and/or their products. Defendant no. 1’s website expressly refers to plaintiff no. 1’s corporate entity and address, even though plaintiff no. 1 has nothing to do with this website. Defendant no. 2 does not have any particulars to indicate who owns the website, but it



purports to provide a download link for plaintiff no. 1's Rummyculture App, which actually downloads an app called "Rummy Good" which is not the plaintiffs' product. Defendant nos. 3 and 4 only refer to themselves by their domain names, with no reference to any legal entity having ownership of the said domain names, and they misleadingly name various rummy apps including "Rummy Culture" and "Rummy Time" of the plaintiffs as a sign of their provenance, credibility and reliability. In similar fashion, defendant no. 5 hosts information about the Rummyculture App and provides a link to download the App without any prior authorization from plaintiff no. 1. Defendant no. 6 uses the Rummy Culture logo and plaintiff no.1's name to market an entirely distinct app having no connection whatsoever with the plaintiffs.

31. It is further submitted that the registrant(s) of the defendant websites are clearly attempting to pass off their infringing websites as the plaintiffs' genuine websites or as having some connection with the plaintiffs and their products. Thus, the defendant websites are misleading and defrauding the plaintiffs' present and prospective customers. For instance, defendant no. 1's infringing website has shockingly copied the entire content, design and layout of plaintiff no. 1's website ([www.rummyculture.com](http://www.rummyculture.com)) and is using the plaintiffs' marks (both registered and unregistered) without any authorization from plaintiff no. 1.

32. It is submitted that it is evident that the defendant nos. 1-12 are misleading many unsuspecting users on a daily basis into downloading various unknown apps, through suspicious links on their websites, and entrapping users wanting to use the plaintiffs' products into downloading dubious apps which have no connection whatsoever with the plaintiffs.



Usage of the aforementioned infringing apps is not reflected on the plaintiffs' systems and any money used in these apps is not deposited with the plaintiffs. Thus, the said apps pose a major financial risk to the public at large whilst using the plaintiffs' name for the defendants' unjust enrichment. A brief summary delineating the fraudulent conduct and infringement being carried out by the defendant websites, as given in the plaint, is reproduced as under:

PARTY	WEBSITE LINK	REMARKS
Defendant No. 1	<a href="https://culture.rummyonline24.com/">https://culture.rummyonline24.com/</a>	Rogue website which has duplicated Plaintiff No.1's website and app.
Defendant No. 2	<a href="https://rummyculture.xyz/">https://rummyculture.xyz/</a>	Rogue website registered on a deceptive domain name and offers a fake app purporting to be the Plaintiff No.1's app.
Defendant No. 3	<a href="https://indorummy.com/about.html">https://indorummy.com/about.html</a>	Rogue website which purports to be the owner of several of the Plaintiffs' platforms including Rummy Culture and Rummy Time.
Defendant No. 4	<a href="https://rummyculture-apk.com/">https://rummyculture-apk.com/</a>	Rogue website registered on a deceptive domain name which purports to be the owner of Plaintiff No.1's Rummy Culture platform.
Defendant No. 5	<a href="https://apksfull.com/rummy-culture-rummy-cash-">https://apksfull.com/rummy-culture-rummy-cash-</a>	Rogue website which hosts unverified information about the Rummy Culture



	<a href="https://game/com.gameskraft.rummycultureplay">game/com.gameskraft.rummycultureplay</a>	platform and provides a download link which leads to the Rummy Culture app's Google PlayStore listing.
Defendant No. 6	<a href="https://apkpure.com/rummy-game-play-rummy-online/com.gameskraft.rummyculturelite">https://apkpure.com/rummy-game-play-rummy-online/com.gameskraft.rummyculturelite</a>	Rogue website which offers a fake app called Rummy Game while misleading customers by using the Rummy Culture logo and listing Plaintiff No.1 as its owner.
Defendant No. 7	<a href="https://rummyculture-practice.in.aptoide.com/app">https://rummyculture-practice.in.aptoide.com/app</a>	Unauthorised third-party mobile app hosting platform which provides a download link for the practice Rummy Culture app developed by Plaintiff No.1 without any prior agreement.
Defendant No. 8	<a href="https://webcatalog.io/en/games/rummyculture/">https://webcatalog.io/en/games/rummyculture/</a>	Unauthorised third-party mobile app hosting platform which provides a download link for a cloned app purporting to be the Rummy Culture app offered by Plaintiff No.1.
Defendant No. 9	<a href="https://rummyculture.en.uptodown.com/android">https://rummyculture.en.uptodown.com/android</a>	Unauthorised third-party mobile app hosting platform which purports to provide a download link for the Rummy Culture app but no app is downloaded.
Defendant No. 10	<a href="https://www.malavida.com/en/soft/rummyculture/android/">https://www.malavida.com/en/soft/rummyculture/android/</a>	Unauthorised ".apk" files repository which provides a download link for the cash Rummy Culture app developed by Plaintiff No.1 without any prior agreement.
Defendant No. 11	<a href="https://www.ldplayer.net/games/rummyculture-game-play-rummy-online-on-pc.html">https://www.ldplayer.net/games/rummyculture-game-play-rummy-online-on-pc.html</a>	Unauthorised third-party mobile app hosting platform which provides a download link for a practice Rummy Culture app developed by Plaintiff No.1 without any prior agreement.
Defendant No. 12	<a href="https://www.getmega.com/rummy/rmg/how-to-hack-rummy-culture/">https://www.getmega.com/rummy/rmg/how-to-hack-rummy-culture/</a>	Webpage titled "How To Hack Rummy Culture: Best Tips For You To Make You Win" published along with a download link for the Rummy Culture app, which in turn redirects users to their own Mega Rummy app.

33. Learned Senior Counsel appearing for the plaintiffs has drawn the attention of this Court to the various documents, which show the infringement and unauthorized use by defendant nos. 1 to 13. The details of



the same are reproduced as under:

S. NO.	DEFENDANT NAME	INFRINGEMENT DEFENDANT WEBSITE	PROOF OF INFRINGEMENT
1.	John Doe	<a href="https://culture.commyonline24.com/">https://culture.commyonline24.com/</a>	Document – 17 (pg. 154-163)
2.	John Doe	<a href="https://rammyculture.com/">https://rammyculture.com/</a>	Document – 18 (pg. 164-167)



3.	John Doe	<a href="https://indorummy.com/about.html">https://indorummy.com/about.html</a>	Document – 19 (pg. 168-172)
4.	John Doe	<a href="https://rummycultureapk.com/">https://rummycultureapk.com/</a>	Document – 20 (pg. 173)
5.	John Doe	<a href="https://apksfull.com/rummy-culture-rummy-cash-game/com.gameskrift.rummycultureplay">https://apksfull.com/rummy-culture-rummy-cash-game/com.gameskrift.rummycultureplay</a>	Document – 21 (pg. 174-175)



6.	John Doe	<a href="https://apkpure.com/rummy-game-play-rummy-online/com.gameskraft.rummyculturellite">https://apkpure.com/rummy-game-play-rummy-online/com.gameskraft.rummyculturellite</a>	Document – 22 (pg. 176)
7.	Aptoide S.A.	<a href="https://rummyculture-practice.in.aptoide.com/app">https://rummyculture-practice.in.aptoide.com/app</a>	Document – 23 (pg. 177)
8.	WebCatalog, Inc.	<a href="https://webcatalog.io/en/games/rummy-culture/">https://webcatalog.io/en/games/rummy-culture/</a>	Document – 24 (pg. 178)





9.	Uptodown Technologies S.L.	<a href="https://rummymyculture.en.uptodown.com/android">https://rummymyculture.en.uptodown.com/android</a>	Document – 25 (pg. 179)
10.	Ontecnia Media Networks S.L.	<a href="https://www.malavida.com/en/soft/rummymyculture/android/">https://www.malavida.com/en/soft/rummymyculture/android/</a>	Document – 26 (pg. 180)
11.	Just Okay Limited	<a href="https://www.idplaye.com.net/games/rummymyculture-game-play-rummy-online-on-pc.html">https://www.idplaye.com.net/games/rummymyculture-game-play-rummy-online-on-pc.html</a>	Document – 27 (pg. 181)



12.	Megashots Internet Private Limited	<a href="https://www.getmegashots.com/rummy/rmg/how-to-hack-rummy-culture/">https://www.getmegashots.com/rummy/rmg/how-to-hack-rummy-culture/</a>	Document – 28 (pg. 182-183)
13.	Firestone Infotech LLP	<a href="https://www.rummywood.com/">https://www.rummywood.com/</a> Rummywood App	<b>App:</b> Document – 29 (pg. 184-186) <b>Website:</b> Document 30 (pg. 187-193)

34. It is further submitted that the use of plaintiff no. 1's "Rummy Culture" mark as part of the domain names and in the content of the websites, by all the defendants, the prominent display of one or more of the plaintiffs, marks on their infringing websites, as well as the near identity of the infringing websites with the plaintiffs website (in the case of defendant nos. 1, 2 and 4), and the reference to the plaintiffs various gaming platforms as an assurance of credibility by various defendants, makes it wholly apparent that the sole intention of the people/entities/registrants operating the defendant websites is to defraud Indian consumers into mistakenly



believing that these are the plaintiffs genuine sites or are somehow associated with/ related to the plaintiff.

35. It is submitted that the defendant websites dishonestly seek to mislead users and seek to capitalize on the brand name, reputation and marks of the plaintiffs. Given the fact that defendant nos. 1-13's actions are fraudulent, the plaintiff is suffering immense losses to its goodwill and injury to its well-earned reputation on account of the unlawful activities of the defendant websites and associated mobile applications.

36. It is further submitted that the defendant websites' as well as defendant no. 13's *modus operandi* is bound to cause incalculable harm and injury to the business, goodwill and reputation of the plaintiffs, especially, on account of the significant injury which the common citizens shall suffer. All profits earned by the said websites in pursuance of their illegal activities amount to unjust enrichment. The damage that has already been inflicted on the plaintiffs' business goodwill and reputation is incapable of being calculated.

37. It is further submitted that the illegal, fraudulent, malafide, unethical, unfair and dishonest acts of the defendant websites and associated mobile applications, amount to (i) infringement of the plaintiffs' trademark rights in the plaintiffs' Marks; (ii) infringement of the plaintiffs' copyright in the plaintiffs' websites and apps; (iii) passing-off; and (iv) unfair competition.

38. It is submitted that defendant nos. 1 to 6 have sought to mask their true identities and take advantage of the plaintiffs' goodwill by outrightly copying its website and/or content and deliberately infringing on the plaintiffs' marks. Thus, it is plainly evident that the said defendants are well aware of the plaintiffs and their rights in the plaintiffs' marks. Defendant



nos. 7 to 12 have published information about the plaintiffs' platforms using the plaintiffs' marks, and are hence also well aware of the plaintiffs and their rights in the plaintiffs' marks. Defendant no.13 has evidently replicated plaintiff no.2's entire UI/UX design on its app and website, and is therefore also well aware of the plaintiffs as well as their rights in the plaintiffs' marks.

39. Learned Senior Counsel for the plaintiffs also prays that interim directions be issued in terms of the application filed on behalf of the plaintiffs. He further relies upon the earlier orders passed by this Court, wherein, similar relief has been granted to other parties with respect to the infringing websites.

40. Accordingly, in the above circumstances, the plaintiffs have demonstrated a *prima facie* case for grant of injunction and, in case, no *ex parte ad interim* injunction is granted, the plaintiffs will suffer an irreparable loss. Further, balance of convenience also lies in favour of the plaintiffs, and against the defendants.

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

41.1 Defendant nos. 1 to 13 (and other rogue websites/domains/entities/mobile applications which are discovered during the proceedings to have been engaging in, or carrying out fraudulent activities by infringement of one or more of the plaintiffs' Marks, "Rummyculture", "Gameskraft", "Culture of Champions",



and all others acting through them and on their behalf, are restrained from infringing any one or more of the registered plaintiff's marks bearing numbers 3983310, 3983309, 4908262, 4908261, 3983311, 6221367, 4524799 and 4524800.

41.2 Defendant nos. 1 to 13 (and other rogue websites/ domains/ entities/ mobile applications which are discovered during the proceedings to have been engaging in or carrying out fraudulent activities by copying the original content of the plaintiffs' websites and/or apps), and all others acting through them and on their behalf, are restrained from infringing on the copyright vested with the plaintiffs in the unique content (textual, visual, pictorial and video) of their websites located at [www.rummyculture.com](http://www.rummyculture.com) and [www.rummytime.com](http://www.rummytime.com) or the apps hosted by the plaintiffs under the names "Rummyculture" and "Rummytime".

41.3 Defendant nos. 1 to 13 (and other rogue websites/ domains/ entities/ mobile applications which are discovered during the proceedings to have been engaging in or carrying out fraudulent activities by using the plaintiffs' Marks or any deceptively similar variants thereof), and all others acting through them and on their behalf, are restrained from passing themselves off as the plaintiffs and/or as being affiliated in any way to either of the



plaintiffs and/or being associated in any way to any of the plaintiffs' Marks, namely "RUMMYCULTURE", "RUMMYTIME", "GAMESKRAFT", "CULTURE OF CHAMPIONS", "NATION'S TRUSTED RUMMY APP", whether by use of part or whole of the plaintiffs' word marks, corporate names, app names, trading styles, unique colour schemes employed in the UI/UX of the plaintiffs' respective apps/websites, distinctive fonts/styles used in the above or in any other manner;

41.4 Defendant nos. 1 to 28 (and other rogue websites/ domains/ entities/ mobile applications which are discovered during the proceedings to have been engaging in or carrying out fraudulent activities by replicating or copying the plaintiffs' websites), and all others acting through them and on their behalf, are restrained from registering any domain name or SEO keywords/metatags containing plaintiffs' marks and anything deceptively similar to plaintiffs' marks including any combination of the words "Rummy" and "Culture" or the words "Rummy" and "Time".

41.5 Defendant nos. 7 to 12, their directors, partners, proprietors, officers, affiliates, servants, employees, and all others in capacity of principal or agent acting for and, on their behalf, or anyone claiming through, by or under them, are directed to take down their respective webpages found at



[“https://rummyculture-practice.in.aptoide.com/app”](https://rummyculture-practice.in.aptoide.com/app),  
[“https://webcatalog.io/en/games/rummyculture/”](https://webcatalog.io/en/games/rummyculture/),  
[“https://rummyculture.en.uptodown.com/android”](https://rummyculture.en.uptodown.com/android),  
[“https://www.malavida.com/en/soft/rummyculture/android/”](https://www.malavida.com/en/soft/rummyculture/android/)  
 , [“https://www.ldplayer.net/games/rummyculture-game-play-rummy-online-on-pc.html”](https://www.ldplayer.net/games/rummyculture-game-play-rummy-online-on-pc.html), and  
[“https://www.getmega.com/rummy/rmg/how-to-hack-rummy-culture/”](https://www.getmega.com/rummy/rmg/how-to-hack-rummy-culture/).

41.6 Defendant nos. 14 to 28, their directors, partners, proprietors, officers, affiliates, servants, employees, and all others in capacity of principal or agent acting for and, on their behalf, or anyone claiming through, by or under them, are directed to provide contact details/addresses of defendant nos. 1-6 (as applicable) and lock/ deactivate/ cancel/ block/ disable/ suspend access to the domain names “culture.rummyonline24.com”, “rummyculture.xyz”, “indorummy.com”, “rummyculture-apk.com”, “apkfull.com”, “apkpure.com” and any other domain names discovered during the proceedings to have been engaging in or carrying out fraudulent activities by infringement of one or more of the plaintiffs’ marks and/or copyrights.

41.7 Defendant nos. 1 to 28 are directed to, from time to time, take down the infringing websites and/or webpages and/or content and /or URLs as may be flagged to them by either of the plaintiffs;

41.8 Defendant nos. 30 and 31 are directed to issue necessary notification and directions to all the concerned telecom and internet service providers



and E-mail service providers to block/delete/remove access during the pendency of the suit, all the E-mail Ids, telephone numbers associated with the subject matter of the present suit.

42. Issue notice to the defendants.

43. Notice is accepted by learned counsels appearing for the defendant nos. 29, 30 and 31.

44. Let notice be issued to the other defendants by all permissible modes, upon filing of process fees, returnable on the next date of hearing.

45. Reply be filed within a period of four weeks, from the date of service.

46. Rejoinder thereto, if any, be filed within a period of two weeks, thereafter.

47. Compliance of Order XXXIX Rule 3 CPC, be done, within a period of one week, from today.

48. List before the Court on 27<sup>th</sup> January, 2025.

**MINI PUSHKARNA, J**

**OCTOBER 1, 2024**

c



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

**CS(COMM) No. \_\_\_\_\_ of 2024**

**IN THE MATTER OF:**

**Gameskraft Technologies Private Limited & Anr.**

**...Plaintiffs**

**-- VERSUS --**

**John Doe trading as <https://culture.rummyonline24.com> & Ors.**

**... Defendants**

**MEMO OF PARTIES**

**IN THE MATTER OF:**

**1. Gameskraft Technologies Private Limited**

A company incorporated under the Companies Act, 2013

*Having its registered office at:*

2<sup>nd</sup> Floor, B-Wing, Elnath Building,

Exora Business Park, Prestige Tech Park,

Kadubesanhalli, Bangalore, Karnataka – 560 103

Email: [secretarial@gameskraft.com](mailto:secretarial@gameskraft.com)

**...Plaintiff No. 1**

**2. Rummytime Technologies Private Limited**

A company incorporated under the Companies Act, 2013

*Having its registered office at:*

2<sup>nd</sup> Floor, B-Wing, Elnath Building,

Exora Business Park, Prestige Tech Park,

Kadubesanhalli, Bangalore, Karnataka – 560 103

Email: [secretarial@rummytime.com](mailto:secretarial@rummytime.com)

**...Plaintiff No. 2**

**VERSUS**

**1. John Doe**

*Trading as <https://culture.rummyonline24.com>*

...Defendant No.1

**2. John Doe**

Trading as [www.rummyculture.xyz](http://www.rummyculture.xyz)

...Defendant No.2

**3. John Doe**

Trading as [www.indorummy.com](http://www.indorummy.com)

...Defendant No.3

**4. John Doe**

Trading as <https://rummyculture-apk.com/>

...Defendant No.4

**5. John Doe**

Trading as <https://apksfull.com/rummy-culture-rummy-cash-game/com.gameskraft.rummycultureplay>

...Defendant No.5

**6. John Doe**

Trading as <https://apkpure.com/rummy-game-play-rummy-online/com.gameskraft.rummyculturelite>

...Defendant No.6

**7. Aptoide S.A.**

Trading as <https://rummyculture-practice.in.aptoide.com/app>

Rua Soeiro Pereira Gomes, Lote 1

3D, 1649-031 Lisboa, Portugal

Email: [support@aptoide.com](mailto:support@aptoide.com)

...Defendant No.7

**8. WebCatalog, Inc.**

Trading as <https://webcatalog.io/en/games/rummyculture/>

2261 Market Street

Suite 10869, San Francisco, CA – 94114

United States of America

Email: [support@webcatalog.io](mailto:support@webcatalog.io)

...Defendant No.8

**9. Uptodown Technologies S.L.**

Trading as <https://rummyculture.en.uptodown.com/android>

Avda. Andalucía, 31

Plant ent. Puerta Of 4, 29006

Málaga, Spain

Email: [contacto@uptodown.com](mailto:contacto@uptodown.com)

**...Defendant No.9**

**10. Ontecnia Media Networks S.L.**

Trading as

<https://www.malavida.com/en/soft/rummyculture/android/>

C/ San Vicente Mártir, 220

Oficina 1, Valencia, Spain

Email: [webcontacto@malavida.com](mailto:webcontacto@malavida.com)

**...Defendant No.10**

**11. Just Okay Limited**

Trading as <https://www.ldplayer.net/games/rummyculture-game-play-rummy-online-on-pc.html>

6/F Manulife Place

348 Kwun Tong Road K1

Hong Kong

Email: [support@ldplayer.net](mailto:support@ldplayer.net)

**...Defendant No.11**

**12. Megashots Internet Private Limited**

Trading as <https://www.getmega.com/rummy/rmg/how-to-hack-rummy-culture/>

25, 8th Main Rd, Vasanth Nagar

Bengaluru, Karnataka – 560 052

Email: [help@getmega.com](mailto:help@getmega.com)

**...Defendant No.12**

**13. Firestone Infotech LLP**

A company registered under the Companies Act, 2013

Having its registered office at:

1095, Sector 10A, Shivaji Nagar,  
Gurgaon, Haryana – 122 001  
*Represented herein by its Designated Partner,*  
*Rohit Kumar Singh*  
Email: [rohit84.ks@gmail.com](mailto:rohit84.ks@gmail.com)

**...Defendant No.13**

**14.GoDaddy.com, LLC**

215 E. GoDaddy Way  
Tempe, Arizona – 85284  
United States of America  
Email: [abuse@godaddy.com](mailto:abuse@godaddy.com) ; [trademarkclaims@godaddy.com](mailto:trademarkclaims@godaddy.com)

**...Defendant No.14**

**15.Gname.com Ptd. Ltd.**

6, Battery Road  
#29-02/03, Singapore  
Email: [complaint@gname.com](mailto:complaint@gname.com) ; [service@gname.com](mailto:service@gname.com) ;  
[business@gname.com](mailto:business@gname.com)

**...Defendant No.15**

**16.NameSilo, LLC**

1300 E Missouri Ave  
Phoenix, Arizona – 85014  
United States of America  
Email: [abuse@namesilo.com](mailto:abuse@namesilo.com)

**...Defendant No.16**

**17.Namecheap, Inc.**

4600 East Washington Street  
Suite 300, Phoenix, AZ 85034  
United States of America  
Email: [abuse@namecheap.com](mailto:abuse@namecheap.com)

**...Defendant No.17**

**18.MarkMonitor, Inc.**

1120 S. Rackham Way, Suite 300  
Meridian, Idaho – 83642  
United States of America  
Email: [abusecomplaints@markmonitor.com](mailto:abusecomplaints@markmonitor.com)

...Defendant No.18

**19.Enom, Inc.**

10400 NE 4<sup>th</sup> Street, Floor 5, Suite 121  
Bellevue, Washington – 98004  
United States of America  
Email: [abuse@enom.com](mailto:abuse@enom.com) ; [legal@enom.com](mailto:legal@enom.com)

...Defendant No.19

**20.Interdominios, Inc.**

Calle Ana Mariscal, No. 5, 28223  
Pozuelo de Alarcón, Madrid,  
CIF No. A-86332913, Spain  
Email: [info@interdominios.com](mailto:info@interdominios.com) ; [admin@interdominios.com](mailto:admin@interdominios.com)

...Defendant No.20

**21.Soluciones Corporativas IP, SL**

C/ Menestrals, 14  
07500 Manacor, Illes Balears  
Spain  
Email: [abuse@scip.es](mailto:abuse@scip.es)

...Defendant No.21

**22.Alibaba Cloud Computing (Beijing) Co., Ltd.**

Alibaba, Building No.9  
Wangjing East Garden  
4th Area, Chaoyang District  
Beijing, China – 100102  
Email: [domainabuse@service.aliyun.com](mailto:domainabuse@service.aliyun.com)

...Defendant No.22

**23.Amazon.com, Inc.**

410, Terry Avenue

North Seattle, Washington – 98109  
United States of America  
Email: [ec2-abuse@amazon.com](mailto:ec2-abuse@amazon.com) ; [abuse@amazonaws.com](mailto:abuse@amazonaws.com) ;  
[trademarks@amazon.com](mailto:trademarks@amazon.com) ; [criminal@amazon.com](mailto:criminal@amazon.com)

...Defendant No.23

**24.Cloudflare, Inc.**

101 Townsend Street  
San Francisco, California – 94107  
United States of America  
Email: [abuse+law@cloudflare.com](mailto:abuse+law@cloudflare.com) ;  
[grievanceofficer@cloudflare.com](mailto:grievanceofficer@cloudflare.com)

...Defendant No.24

**25.Hostinger International Limited**

61 Lordou Vironos str.  
6023 Larnaca, Cyprus  
*also at:*  
Hostinger, UAB  
Švitrigailos str. 34, 03230  
Vilnius, Lithuania  
Email: [abuse@hostinger.com](mailto:abuse@hostinger.com)

...Defendant No.25

**26.Fastly, Inc.**

475 Brannan St. #300  
PO Box 78266  
San Francisco, California – 94107  
United States of America  
Email: [abuse@fastly.com](mailto:abuse@fastly.com)

...Defendant No.26

**27.Akamai International, B.V.**

Grote Bickersstraat 74  
1013 KS Amsterdam  
Netherlands  
Email: [corporate-emea@akamai.com](mailto:corporate-emea@akamai.com) ; [abuse@akamai.com](mailto:abuse@akamai.com)

...Defendant No. 27

**28.Zhejiang Taobao Network Co., Ltd**

969 West Wen Yi Road  
Yu Hang District, Hangzhou – 311121  
Zhejiang Province, China  
Email: [lianzheng@alibaba-inc.com](mailto:lianzheng@alibaba-inc.com)

...Defendant No. 28

**29.Google, LLC**

1600 Amphitheatre Parkway  
Mountain View, California – 94043  
United States of America  
Email: [support-in@google.com](mailto:support-in@google.com) ; [uslawenforcement@google.com](mailto:uslawenforcement@google.com)

...Defendant No. 29

**30.Department of Telecommunications**

Through Secretary  
Ministry of Communications  
20, Sanchar Bhawan, Ashoka Road  
New Delhi – 110 001  
Email: [secy-dot@nic.in](mailto:secy-dot@nic.in) ; [dirds2-dot@nic.in](mailto:dirds2-dot@nic.in) ;  
[uoidhc@gmail.com](mailto:uoidhc@gmail.com)

...Defendant No.30

**31.Ministry of Electronics and Information Technology**

Through the Director General (DIT Cyber Laws & E-security)  
Electronics Niketan, 6, CGO Complex  
Lodhi Road, New Delhi – 110 009  
Email: [cyberlaw@meity.gov.in](mailto:cyberlaw@meity.gov.in) ; [gccyberlaws@meity.gov.in](mailto:gccyberlaws@meity.gov.in) ;  
[uoidhc@gmail.com](mailto:uoidhc@gmail.com)

...Defendant No.31

**32.National Internet Exchange of India**

6C, 6D, 6E  
Hansalaya Building 15  
Barakhamba Road, New Delhi – 110 001  
Email: [info@nixi.in](mailto:info@nixi.in)

...Defendant No.32

**33. Deputy Commissioner of Police**

Cyber Cell (New Delhi)

Cyber Police Station

PS Mandir Marg, New Delhi – 110 001

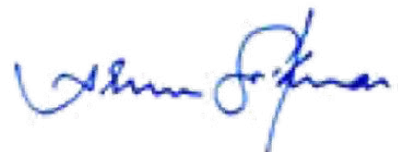
Email: [shocyber.nd@delhipolice.gov.in](mailto:shocyber.nd@delhipolice.gov.in)**...Defendant No.33**

*\* Defendants Nos. 1 - 13 are the main contesting defendants.*

*\*\* The identify of Defendant Nos. 1-6 are not known. Hence, the said Defendants are being impleaded as 'John Doe' without any particulars.*

*\*\*\* Plaintiff No. 1 and 2 are group companies. Ad-valorem court fees has been paid by Plaintiff No.1 on behalf of both the Plaintiffs since common reliefs are sought by both of them as well.*

FILED THROUGH:

**MR. ARUN SRI KUMAR****M/S KEYSTONE PARTNERS  
ADVOCATES AND SOLICITORS****Counsel for the Plaintiffs**

E-10, Defence Colony,

New Delhi – 110 024

Ph.No.: +91 98867 20984

E: [arun.srikumar@keystone.law](mailto:arun.srikumar@keystone.law)

Place: New Delhi

Date: 19.09.2024



**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.