813-7/25/2024-DS-Part(1) 1/3237873/2025

### 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-08/2024-DS-II

Dated:02-01-2025

To,

All the Internet Service Licensees

Subject: CS(COMM) 163 of 2024: STAR INDIA PRIVATE LIMITED & ANR. Vs. TERIIMERIDOORIYAN.COM & ORS. Before Hon'ble Delhi High Court

Kindly find enclosed the Hon'ble Delhi High Court order dated **23.02.2024**, **17**<sup>th</sup> **and 18**<sup>th</sup> additional affidavits dated on the subject matter.

- 2. Please refer to the **para 16 (e) & 16(f)** of the said court order in respect of blocking of **websites** enumerated in Annexure A of affidavit.
- 3. In view of the above, all the Internet Service licensees are hereby instructed to take immediate necessary action for blocking of the said websites, as above, for compliance of the said court order.

Digitally signed by Shashi Kumar

Date: 02-01-2025 10:37:06 **Director (DS-II)** 

Email: dirds2-dot@nic.in

Encl:A/A

#### Copy to:

- 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 B.**
- ii. S. Dhoundiyal (s.dhoundiyal@saikrishnaassociates.com) Plaintiff Advocate for kind information. [Requested to take action as per Annexure B].
- iii. IT wing of DoT for uploading on DoT websites please.





\$~15

- \* IN THE HIGH COURT OF DELHI AT NEW DELHI
- + CS(COMM) 163/2024, I.A. 4270/2024, I.A. 4271/2024, I.A. 4272/2024 & I.A. 4273/2024

STAR INDIA PRIVATE LIMITED & ANR.

..... Plaintiffs

Through:

Mr. Siddharth Chopra, Mr. Yatinder Garg and Ms. Astha Sehgal and Ms. Srishti Dhoundiyal, Advocates for

plaintiff.

versus

TERIIMERIDOORIYAN.COM & ORS.

..... Defendants

Through:

Ms. Mrinal Ojha, Mr. D. Datta and Ms.

Tanya Choudhary, Advocates for D-24.

**CORAM:** 

HON'BLE MR. JUSTICE ANISH DAYAL

ORDER

%

### **I.A.** 4273/2024 (seeking leave to file additional documents)

- 1. The present application has been filed on behalf of plaintiffs under Order XI Rule 1(4) of the Code of Civil Procedure, 1908 as applicable to commercial suits under the Commercial Courts Act, 2015 seeking to place on record additional documents.
- 2. Plaintiffs, if they wish to file additional documents at a later stage, shall do so strictly as per the provisions of the Commercial Courts Act, 2015 and the Delhi High Court (Original Side) Rules, 2018.
- 3. Accordingly, the present application is disposed of.





# I.A. 4271/2024 (exemption from filing clear copies)

- 1. Exemption is granted, subject to all just exceptions.
- 2. Applicants shall file legible, clear, and original copies of the documents on which the applicants may seek to place reliance within four weeks from today or before the next date of hearing, whichever is earlier.
- 3. Accordingly, the present application is disposed of.

### **I.A.** 4272/2024 (exemption from issuing notice)

- 1. This is an application seeking exemption from serving notice under Section 80 CPC to defendant nos. 33, 36, 41, and 42.
- 2. Exemption is granted.
- 3. Application stands disposed of.

### **CS(COMM)** 163/2024

- 1. Let the plaint be registered as a suit.
- 2. Upon filing of process fee, issue summons to defendants through all permissible modes. Summons shall state that written statement(s) be filed by the defendants within 30 days from the date of receipt of summons. Along with the written statement(s), defendants shall also file affidavit(s) of admission/denial of plaintiffs' documents, without which the written statement shall not be taken on record. Liberty is given to plaintiffs to file a replication within 30 days of the receipt of the written statement(s). Along with the replication, if any, filed by the plaintiffs, affidavit(s) of admission/denial of documents filed by the defendants, be filed by the plaintiffs, without which the replication(s) shall not be taken on record. If any of the parties wish to seek





inspection of any documents, the same shall be sought and given within the timelines.

- 3. List before the Joint Registrar for marking of exhibits on 30<sup>th</sup> April, 2024.
- 4. It is made clear that any party unjustifiably denying documents would be liable to be burdened with costs.

# **I.A. 4270/2024** (application under Order XXXIX Rule 1 & 2 of the CPC)

- 1. This application has been filed as part of the suit filed by plaintiffs seeking permanent injunction restraining infringement of its copyright and broadcast reproduction rights, under the Copyright Act, 1957 ("the Act") on account of unlawful activities by defendant nos. 1 to 21 in facilitating/enabling/authorizing access to the public of the plaintiffs' exclusive copyright in content, *inter alia*, films, general entertainment, content, original web-series etc. ("plaintiffs' content").
- 2. It is alleged that defendant nos.1 to 21 are *rogue websites* that communicate, make available to, and provide access to plaintiffs' content without any authorization from various right owners, including the plaintiffs.
- 3. Plaintiff's counsel submits that the content on 'Disney+ Hotstar' and the STAR Channels is produced by plaintiffs and forms the subject matter of the instant suit. As described in paragraph no. 8 of the plaint and documents at serial nos. 2 and 4, plaintiffs are the producers of various TV Shows, films and/or web-series which are disseminated on STAR Channels and/or 'Disney+ Hotstar' and have the exclusive distribution rights to publicly exhibit and communicate the said content through any medium or mode including on the





STAR Channels or 'Disney+ Hotstar'. They are protected as 'cinematograph films' under Section 2(f) read with Section 13 of the Act.

- 4. It is asserted that defendant nos. 1 to 21 are liable for infringement of copyright under Section 51 of the Act and the various 'exclusive rights' that, *inter alia*, would be deemed to have been infringed/ violated by the defendant nos. 1 to 21 are:
  - a. the right of making a copy of plaintiffs' cinematograph films including the storing of it in any medium by electronic or other means;
  - b. the right of communicating plaintiffs' cinematograph films to the public.
- 5. Counsel for plaintiffs draws attention to the decision of this Court in *UTV*Software Communication v. 1337X.TO & Ors., 2019 SCC OnLine Del 8002, where a Coordinate Bench of this Court has deliberated in detail on the issues involved around infringing websites, in that, such infringing websites could contain infringing content, as well as content which was not showed. The Court has formulated certain illustrative guidelines for the Courts to assess while determining whether an infringing website would be considered as promoting or offering pirated content. For ease of reference, an extract from the decision is as under:
  - **"59**. In the opinion of this Court, some of the factors to be considered for determining whether the website complained of is a FIOL/Rogue Website are:
  - a. whether the primary purpose of the website is to commit or facilitate copyright infringement;





- b. the flagrancy of the infringement, or the flagrancy of the facilitation of the infringement;
- c. whether the detail of the registrant is masked and no personal or traceable detail is available either of the Registrant or of the user.
- d. whether there is silence or inaction by such website after receipt of take down notices pertaining to copyright infringement.
- e. whether the online location makes available or contains directories, indexes or categories of the means to infringe, or facilitate an infringement of, copyright;
- f. whether the owner or operator of the online location demonstrates a disregard for copyright generally;
- g. whether access to the online location has been disabled by orders from any court of another country or territory on the ground of or related to copyright infringement;
- h. whether the website contains guides or instructions to circumvent measures, or any order of any court, that disables access to the website on the ground of or related to copyright infringement; and
- i. the volume of traffic at or frequency of access to the website;
- j. Any other relevant matter.
- **60**. This Court clarifies that the aforementioned factors are illustrative and not exhaustive and do not apply to intermediaries as they are governed by IT Act, having statutory immunity and function in a wholly different manner."
- 6. Counsel for plaintiffs has made this Court traverse through the above aspects, each supported by documentation filed by them.
- 7. It is evident from these documents which have been perused by the Court that *prima facie* the plaintiffs' content on its various channels *inter alia* Star





Plus, Star World, Star Movies, Star Bharat, Movies OK, Star Gold, Jalsha Movies (in all about 77 channels across 8 languages) and OTT platform – Disney + Hotstar has been hosted/carried on these infringing websites. The illustrative list of content to which the plaintiffs claim its copyright and which is being made available through the infringing websites is tabulated as under:

S. NO.	WEB- SERIES/ SERIAL	S. NO.	WEB- SERIES/ SERIAL	S. NO.	WEB- SERIES/ SERIAL
1.		2.		3.	
	Criminal Justice		Aashiqana		Saas, Bahu Aur Flamingo
4.		5.		6.	
	City of Dreams		Masoom		Aakhri Sach
7.		8.		9.	
	Hostages		Shoorveer		The Freelancer
10.		11.		12.	
	Out of Love		Ghar Waapsi		Karmma Calling
13.		14.		15.	
	Special Ops		Dahan: Raakan Ka		Unheard
			Rahasya		
16.		17.		18.	
	Aarya		Aakhri Shikaar		Parampara
19.		20.		21.	
	Live Telecast		Jhansi		Human
22.		23.		24.	
	1962: The War in the Hills		Fall		Save the tigers
25.		26.		27.	
	November Story		Teerandaz		Sultan of Delhi
28.	Grahan	29.	Anger Tales	30.	Mansion 24
31.		32.		33.	
	The Empire		School Of Lies		Label
34.	•	35.		36.	
	The Great Indian Murder		Shaitan		Vadhuvu
37.		38.		39.	
	Rudra: The Edge of		Trial		Kerala Crime Files
	Darkness				
40.		41.		42.	
	Kana Kaanum Kaalangal		Dayaa		Taaza Khabar
43.		44.		45.	
	Anupama: Namaste		Commando		Loki
	America				
46.		47.		48.	
	Escaype Live		Mathagam		The Night Manager
49.		50.		51.	
	9 Hours		Kaala		Athidhi
52.		53.		54.	
	Keh Doon Tumhein		Kaahin Kissii Roz		Des Mein Niklla Hoga
					Chand
55.		56.		57.	
	Teri Meri Dooriyan		K. Street Pali Hill		Karma





58.		59.		60.	
56.	Anupama	37.	Jeet	00.	Hatim
61.	7 Hiupunia	62.	3001	63.	Tiutiiii
01.	Kahaani Ghar Ghar Kii	02.	Kasautii Zindagii Kay	05.	Saans
64.		65.		66.	
	Shagun		Koi Laut Ke Aaya Hai		
67.		68.		69.	
	Kundali		Saath Nibhana Saathiya		Kehta Hai Dil
70.		71.		72.	
	Son Pari		Yeh Rishta Kya Kehlata Hai		Rishton Ka Chakravyuh
73.		74.		75.	
	Yeh Hai Mohabbatein		Sapna Babul Ka Bidaai		Saara Akaash
76.		77.		78.	
	Kuch Toh Hai Tere Mere		Baa Bahoo Aur Baby		Shaurya Aur Suhani
	Darmiyaan				
79.		80.		81.	
	Pardes Mein Hai Mera Dil		Kesar		Raja Ki Aayegi Baraat
82.		83.			
	Sanjivani: A Medical Boon		Kabhi Aaye Naa Judaai		

- 8. Claim of the plaintiffs to this content is of an exclusive right under Section 14(d) of the Act and a concomitant right of broadcast reproduction under Section 37 of the Act. The right to sue for infringement arises under Section 51 of the Act.
- 9. Counsel for plaintiffs further points out that copyright infringement notices under the Digital Millennium Copyright Act, 1998 ("DMCA") have been duly addressed and issued to each of the rogue websites, and are placed on record. None of the defendants have responded to the same. It is also alleged in the plaint that pursuant to receipt of the DMCA notice, some of the defendant websites despite restraining from illegal activities, have deliberately created redirected websites. An infringement report made available pursuant to an internal investigation has also been placed on record.





- 10. In light of these facts and circumstances, the plaintiffs in relation to the guidelines of *UTV Software Communication (supra)* claims as under:
  - (i) It is evident from the overall content available on the infringing websites, of which screenshots have been place on record, that the primary purpose is to commit or facilitate copyright infringement.
  - (ii) The flagrancy of the infringement and the facilitation thereof, is evident from the messages on the some of these rogue websites.
  - (iii) As noted above, there has been silence and inaction by infringing websites after legal notices were sent.
  - (iv) The infringing websites clearly make available indexes to the content to which the plaintiffs claim copyright.
  - (v) The access to the owners/operators of infringing websites which are used in the infringing websites have been masked as evident from the WHOIS registrant details.
  - (vi) It is pointed out that some of the defendants *inter alia* defendant no.1 and 8 have adopted the domain name in the name of plaintiffs' content itself.
  - (vii) These websites are updating on a day-to-day basis and providing latest content of the plaintiffs.
- 11. Defendant nos. 22 to 31 have been arrayed, who are Domain Name Registrars ("**DNR**s") for the infringing websites.





- 12. Defendant nos. 32 to 40 are various Internet Service Providers ("ISPs") available domestically in India who provide access to internet in India. They control access to internet and are in a position to ensure that access to these infringing websites is not available.
- 13. Defendant no. 41 is the Department of Telecommunication ("**DOT**"), while defendant no. 42 is Ministry of Electronics and Information Technology ("**MEITY**"), which represents the Government and are the overall regulators of the internet environment in the country. They have been called upon for the purpose of ensuring that the ISPs are in compliance with any directions which may be passed by this Court.
- 14. Defendant no. 43 has been arrayed as "Ashok Kumar" which is a generic name (as John Doe) to include all those who in the future may be discovered as using the plaintiffs' content.
- 15. In light of these circumstances, the Court is of the view that plaintiffs have made out a *prima facie* case for grant of an *ex-parte ad interim* injunction as also a dynamic injunction. Balance of convenience lies in favour of plaintiffs as irreparable loss would be caused if the same is not granted.
- 16. Accordingly, till the next date of hearing the following directions are issued:
  - a) Defendant nos.1 to 21 including their owners, partners, proprietors, officers, servants, affiliates, employees, and all others in capacity of principal or agent acting for and on its behalf, or anyone claiming through, by or under it, are restrained from in any manner communicating to the public, hosting, storing, reproducing, streaming,





broadcasting, re-broadcasting, causing to be seen or heard by public on payment of charge and/or making available for viewing plaintiffs' content through their websites including those listed as under:

S.No.	Websites Name	S.No.	Websites Name
1.	Teriimeridooriyan.com	2.	ziddidilserial.pk
3.	Playkaro.net	4.	Ww1.6hiidude.me
5.	Desi-serial.mom	6.	6hiidude.vip
7.	Castlehdapk.com	8.	Hdmoviehub.bio
9.	Barsatien.com	10.	hdmoviehub.blog
11.	barsaateinmausampyarka.com	12.	One.vegamovieshub.pro
13.	Hdmovie2.ren	14.	One.vegamovieshub.boutique
15.	hdmovie2.so	16.	Filmyzilla.pro.in
17.	Ww4.5movierulz.team	18.	filmyzilla.org.bz
19.	5movierulz.cool	20.	Filmyfly.zip
21.	7starhd1.live	22.	Filmyfly.dad
23.	Wvw.kehdoontumhein.com	24.	Mkvhub.skin
25.	Tvshowhub.online	26.	Bid.ibomma.link
27.	Movieswatchonline0.com.pk	28.	Ltd.ibomma.rsvp
29.	watch-online-movies.com.pk	30.	10starhd.de
31.	7starhd.auction	32.	10starhd.host





33.	7starhd.dad	34.	ww9.5movierulz.top
35.	www.ziddidili.com	36.	Ww7.5movierulz.vet

- b) Defendant nos. 22 to 31 are directed to lock and suspend/deactivate the abovementioned domains/sub-domains of the infringing websites. In the event, the said defendants have any reservation, they shall address a written/email communication to the plaintiffs stating the reasons for the same. Plaintiffs are at liberty to approach this Court for any relief they may seek pursuant to the same.
- c) Defendant nos. 22 to 31 are directed to disclose complete details (*inter alia* name, address, email, phone number and IP address) of defendant nos.1 21, and mode of payment along with payment details used for registrations of the said domain names. The said disclosure shall be made by an affidavit and be filed before this Court within a period of four weeks.
- d) Defendant nos.32 to 40 (ISPs) are directed to block access to these infringing websites tabulated above, within 48 hours of receipt of this order.
- e) Defendant nos. 41 and 42 (DoT and MEITY) shall take steps to ensure that ISPs comply with the directions issued above, through appropriate communications and notices sent to the said ISPs, including other ISPs which are registered with them.





f) It is further directed that if any other mirror websites/ alphanumeric websites/similar websites are found to be directly or indirectly infringing the plaintiffs' rights, the plaintiffs will be at liberty to communicate in writing/email to the DNRs, ISPs, DoT, MEITY. The said defendants shall ensure that the directions given above shall be extended to those websites as well. If any of these defendants have a reservation, they will be at liberty to address a written communication/email to the plaintiffs stating the reasons for the same. The plaintiffs are at liberty to approach this Court for any relief they may seek pursuant to the same. Plaintiffs shall also file within 24 hours of sending any such communication, an affidavit before this Court giving the list of the websites they have communicated to the said defendants, as well as supporting documentation in relation to the same. The plaintiffs shall be held to their affidavit and in the event any assertion by the plaintiff, of a website being a rogue website, is found to be incorrect or false, it may necessitate strictures/directions from this Court.

- 20. Compliance with Order XXXIX Rule 3 of the CPC be done within a week.
- 21. List before this Court on 03<sup>rd</sup> May, 2024.
- 22. Order be uploaded on the website of this Court.

ANISH DAYAL, J

FEBRUARY 23, 2024/RK/rj

# IN THE HIGH COURT OF DELHI AT NEW DELHI (ORDINARY ORIGINAL COMMERCIAL JURISDICTION) CS(COMM) NO. 163 OF 2024

### IN THE MATTER OF:

Star India Pvt. Ltd. & Anr

...Plaintiffs

Versus

Teriimeridooriyan.com & Ors.

...Defendants

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H2812/19

Place: New Delhi Date: 23.12.2024

Astha Sehgal | Srishti Dhoundiyal (D/3817/2019) | (D/2488/2020) Saikrishna and Associates Advocates for the Plaintiff 57 Jor Bagh, New Delhi, 110003 +91 9910634753

s.dhoundiyal@saikrishnaassociates.com

# IN THE HIGH COURT OF DELHI AT NEW DELHI (ORDINARY ORIGINAL COMMERCIAL JURISDICTION) CS(COMM) NO. 163 OF 2024

IN THE MATTER OF:

2.

Debajyoti Behuria

Star India Pvt. Ltd. & Anr

...Plaintiffs

Versus

Teriimeridooriyan.com & Ors.

...Defendants

AFFIDAVIT OF MR. HITENDER ADLAKHA, S/O MR. SH. LATE R.L. ADLAKHA, AGED ABOUT 53 YEARS, AUTHORISED SIGNATORY OF PLAINTIFFS, STAR INDIA PVT. LTD. AND NOVI DIGITAL ENTERTAINMENT PVT. LTD. HAVING REGISTERED OFFICE AT STAR HOUSE, URMI ESTATE, 95 GANPATRAO KADAM MARG, LOWER PAREL (W), MUMBAI 400013, PRESENTLY AT NEW DELHI, INDIA, ON BEHALF OF THE PLAINTIFFS.

I, the above-named deponent, do hereby solemnly affirm and declare as under:

- That, I am the Authorized Representative of the Plaintiffs in the present suit and as such I am conversant with the facts and circumstances of the present suit and competent to depose in respect thereof.
  - That the Plaintiffs have filed the instant suit for permanent injunction restraining infringement of their Broadcasting Reproduction Rights arising on account of illegal communication of their popular contents including but not limited to, 'Anupamaa', 'Aarya', 'Yeh Rishta Kya Kehlata Hai', 'Athidhi', 'Sultan of Delhi', 'Masterpeace', 'The Trial', etc. (collectively referred as "Plaintiffs' Work"), being

broadcasted on STAR Channels and Disney + Hotstar. It is pertinent to mention that Defendant Nos. 1-21 ("Rogue Websites") are indulged in unauthorizedly broadcasting and making available the Plaintiffs' work without their permission.

3. I state that I am aware of the present suit and the order dated 23.02.2024 whereby the Hon'ble Court was pleased to pass an *ex-parte ad-interim* order in terms of the following:

"15. In light of these circumstances, the Court is of the view that plaintiffs have made out a prima facie case for grant of an ex-parte ad interim injunction as also a dynamic injunction. Balance of convenience lies in favour of plaintiffs as an irreparable loss would be caused if the same is not granted.

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

a) Defendant nos.1 to 21 including their owners, partners, proprietors, officers, servants, affiliates, employees, and all others in capacity of principal or agent acting for and on its behalf, or anyone claiming through, by or under it, are restrained from in any manner communicating to the public, hosting, storing, reproducing, streaming, broadcasting, rebroadcasting, causing to be seen or heard by public on payment of charge and/or making available for viewing plaintiffs' content through their websites including those listed as under:

-		
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COL	Cautal De © Salari gas los	3
The state of the s	r. or	

K.Na.	Websites Name	S.Na.	Websites Name
1.	Terimeridocetym.com	2.	ziddidilserist pk
3,	Playbaro aut	4.	Ww Libbidade.me
\$.	Dovi-serial more	6,	6břidude, vip
7.	Castlebdspk_com	8.	Hdmovishub bio
9.	Baratios.com	10.	Indonesialanh Johny
tı.	harautiimmusunpyetka.com	12.	One.vegamovicalmb.pro
13.	Hdesovie2.res	14.	One. vegameviednih boutique
15.	hdmovic2.m	16.	Filmyrilla.pro.in
17.	Ww4.Suovierdz.tem	110.	filmyzilla.org.bx
19.	Swoviends.cool	20.	Filosythy.zip
21.	7starfed Lilive	22.	FilmyBy.dad
23.	Wee Libbarahin	34.	helico book ak in
25.	Trabestationing	26.	Bid ibones liek
27.	Meyeswatchoolise0.com.pk	28.	Ladibommarryp
29.	watch-outsie-movies.com.pk	30,	J Ostarbel, do
31.	7stachul maçticm	32.	I Ostarlid Junit

11	Twarted dad	34.	ww.9 5 men serule top
35.	mon abbabba www	36	Ww7.5movierale.vet

b) Defendant nos. 22 to 31 are directed to lock and suspend/deactivate the abovementioned domains/subdomains of the infringing websites. In the event, the said defendants have any reservation, they shall address a written/email communication to the plaintiffs stating the reasons for the same. Plaintiffs are at liberty to approach this Court for any relief they may seek pursuant to the same.

c) Defendant nos. 22 to 31 are directed to disclose complete details (inter alia name, address, email, phone number and IP address) of defendant nos. I - 21, and mode of payment along with payment details used for registrations of the said domain names. The said disclosure shall be made by an affidavit and be filed before this Court within a period of four weeks.

d) Defendant nos.32 to 40 (ISPs) are directed to block access to these infringing websites tabulated above, within 48 hours of receipt of this order.

e) Defendant nos. 41 and 42 (DoT and MEITY) shall take steps to ensure that ISPs comply with the directions issued above, through appropriate communications and notices sent to the said ISPs, including other ISPs which are registered with them

4. I state that in order to protect and enforce Plaintiffs' Exclusive Rights in its work, the Plaintiffs engaged the services of an investigation agency to monitor Rogue Websites. I state that the Plaintiffs with the help of the investigator have identified the additional websites as mentioned in Annexure A, which are illegally streaming Plaintiffs' work, and are infringing the Plaintiff's Exclusive Rights.

I state that from the evidence filed along with the present Affidavit, it is evident that the identified websites as mentioned at Annexure A are communicating and/or streaming and/or providing access and/or making available for viewing the broadcast of the Plaintiffs' work. I state that the Plaintiffs are the exclusive right holders for the Plaintiffs' work and the Plaintiffs have not authorized any of the above-

mentioned websites to communicate and or make available for viewing their content.

- 6. I state that the Plaintiffs are not aware of the owners of these additional websites as either they are anonymous or have incorrect or incomplete address.
- 7. I state that in terms of the following directions passed by this Hon'ble Court, *vide* order dated 23.02.2024 (reproduced herein above) is also applicable on the newly identified websites at **Annexure A**.

f) It is further directed that if any other mirror websites/ alphanumeric websites/similar websites are found to be directly or indirectly infringing the plaintiffs' rights, the plaintiffs will be at liberty to communicate in writing/email to the DNRs, ISPs, DoT, MEITY. The said defendants shall ensure that the directions given above shall be extended to those websites as well. If any of these defendants have a reservation, they will be at liberty to address a written communication/email to the plaintiffs stating the reasons for the same. The plaintiffs are at liberty to approach this Court for any relief they may seek pursuant to the same. Plaintiffs shall also file within 24 hours of sending any such communication, an affidavit before this Court giving the list of the websites they have communicated to the said defendants, as well as supporting documentation in relation to the same. The plaintiffs shall be held to their affidavit and in the event any assertion by the plaintiff, of a website being a rogue website, is found to be incorrect or false, it may necessitate strictures/directions from this Court."

8. I state that the evidence filed along with the present affidavit was shared by the investigating agency in google drive link. I downloaded the same onto the computer bearing model no. E53DC292-51B8-464-90Dl- 7F0096A43466 (HP), GHz, which is regularly used by me in the ordinary course of business and thereafter, shared the same with the Plaintiffs' Counsel.

9. I am advised to state that the conditions of Order XI Rule 6(3) of the Commercial Courts, Commercial Division and Commercial Appellate Division of High Courts Act, 2015 are complied with in respect of these documents.

# 10. In particular, I confirm: -

- That the said computer system is regularly used to produce computer outputs like emails and information from the World Wide Web (Internet) and store other electronic records. The relevant information from the websites and electronic records as mentioned above was downloaded by me in the course of activity of the Plaintiffs. I have a lawful control over the use of the said computer system by virtue of my capacity in the organization.
- b) That the electronic records mentioned above are downloaded from the computer system as part of the ordinary course of activities of the Plaintiffs.
- c) That the computer system as used by me has been operating properly and the electronic records and their accuracy and contents have not been altered and tampered with in any manner whatsoever.

That the information contained on the computer outputs is an exact replica and has been produced from the original electronic record and therefore, reproduces the information contained on the electronic records therein

DEPONENT

### **VERIFICATION**

1 6 DEC 2024

Verified at New Delhi on this 16 day of December 2024 that the contents of the above said Affidavit are true to the best of knowledge, information and belief and nothing material has been

concealed therefrom.

DEPONENT

CERTIFIED THAT THE BEPONEN Add Line Add



# ANNEXURE - A

S.No.	Websites
1.	3filmyhit.com
2.	720pflix.bar
3.	7starhd.nagoya
4.	8xfilms.my
5.	9xmovies.builders
6.	afilmyhit.dr.in
7.	all.hdmovies4u.my
8.	apnetv.com.co
9.	apnetv.uk
10.	bdmusic23.date
11.	bolly4you.my
12.	bollyflix.meme
13.	bollymod.best
14.	ddrmovies.living
15.	desiremovies.diy
16.	desiremoviess.top
17.	downloadhub.ceo
18.	downloadhub.direct
19.	downloadhub1.my
20.	dudefilms.ing
21.	filmyfly.durban
22.	filmygod.my
23.	filmywapi.cc
24.	filmyworlds.work
25.	hdhub.guru
26.	hdhub4u.com.im
27.	hdhub4u.now
28.	hdmovie2.dance
29.	hdmoviearea.click
30.	hdmoviehub.si
31.	hdmovies23.shop
32.	hdmoviesshub.life
33.	kaisemujhetummilgye.com

34.	kuttymoviess.my
35.	luxmovies.hair
36.	mkvmoviespoint.my
37.	movies4u.cool
38.	movieshunt.org
39.	moviesmod.fashion
40.	moviesmod.my
41.	moviesverse.yachts
42.	moviezguru.website
43.	mp4moviez.fund
44.	mytamildhool.cam
45.	onlinedesiserial.net
46.	thekhatrimaza.app
47.	udnekiaasha.su
48.	vegamovies3.club
49.	vegamoviess.top
50.	ww2.4movierulz.cv

# ANNEXURE - A

1.         3filmyhit.com           2.         720pflix.bar           3.         7starhd.nagoya           4.         8xfilms.my           5.         9xmovies.builders           6.         afilmyhit.dr.in           7.         all.hdmovies4u.my           8.         apnetv.com.co           9.         apnetv.uk           10.         bdmusic23.date           11.         bolly4you.my           12.         bollyflix.meme           13.         bollymod.best           14.         ddrmovies.living           15.         desiremovies.diy           16.         desiremovies.top           17.         downloadhub.ceo           18.         downloadhub.direct           19.         downloadhub.imy           20.         dudefilms.ing           21.         filmyfly.durban           22.         filmygod.my           23.         filmyworlds.work           24.         filmyworlds.work           25.         hdhub.guru           26.         hdhub.du.now           27.         hdhub.du.now           28.         hdmoviearea.click           30.	S.No.	Websites
3.         7starhd.nagoya           4.         8xfilms.my           5.         9xmovies.builders           6.         afilmyhit.dr.in           7.         all.hdmovies4u.my           8.         apnetv.com.co           9.         apnetv.uk           10.         bdmusic23.date           11.         bolly4you.my           12.         bollyflix.meme           13.         bollymod.best           14.         ddrmovies.living           15.         desiremovies.diy           16.         desiremoviess.top           17.         downloadhub.ceo           18.         downloadhub.direct           19.         downloadhub.imy           20.         dudefilms.ing           21.         filmyfly.durban           22.         filmygod.my           23.         filmygod.my           23.         filmyworlds.work           25.         hdhub.guru           26.         hdhub4u.com.im           27.         hdhub4u.now           28.         hdmovie2.dance           29.         hdmoviearea.click           30.         hdmoviearea.click	1.	3filmyhit.com
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5. 9xmovies.builders 6. afilmyhit.dr.in 7. all.hdmovies4u.my 8. apnetv.com.co 9. apnetv.uk 10. bdmusic23.date 11. bolly4you.my 12. bollyflix.meme 13. bollymod.best 14. ddrmovies.living 15. desiremovies.diy 16. desiremoviess.top 17. downloadhub.ceo 18. downloadhub.direct 19. downloadhub.limy 20. dudefilms.ing 11. filmyfly.durban 12. filmygod.my 13. dilmywapi.ce 14. dilmyworlds.work 15. downloadhub.direct 19. do	3.	7starhd.nagoya
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	29.	hdmoviearea.click
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32. hdmoviesshub.life	32.	hdmoviesshub.life
33. kaisemujhetummilgye.com	33.	kaisemujhetummilgye.com

34.	kuttymoviess.my
35.	luxmovies.hair
36.	mkvmoviespoint.my
37.	movies4u.cool
38.	movieshunt.org
39.	moviesmod.fashion
40.	moviesmod.my
41.	moviesverse.yachts
42.	moviezguru.website
43.	mp4moviez.fund
44.	mytamildhool.cam
45.	onlinedesiserial.net
46.	thekhatrimaza.app
47.	udnekiaasha.su
48.	vegamovies3.club
49.	vegamoviess.top
50.	ww2.4movierulz.cv

#	Domain Name			
1	zididiltv.com			
2	ziddidilasia.com			
3	yodesiserialss.net			
4	wwv.yodesiserials.in			
5	ww4.yodesitv.org			
6	ww1.fmovies.do			
7	worldfree4u.now			
8	watchofree.online			
9	vegamovies4u.tattoo			
10	vegamovies4u.my			
11	vanshaj.sbs			
12	v.yodesiserials.net			
13	udnekiaashaserial.net			
14	thevegamovies.at			
15	tamilarasan.com			
16	serialmaza.com			
17	redmovies.store			
18	ofilmyzilla.tw			
19	ofilmywap.org.je			
20	neeplay.com			
21	moviezwap.gold			
22	moviesrush.my			
23	moviesnation.monster			
24	movierulzhub.ws			
25	mkvmad.bet			
26	mkvin.pics			
27	mishriserial.net			
28	mishri.su			
29	luxmovies.makeup			
30	livemovie.pro			
31	kmmovies.top			
32	kkk14tv.com			
33	khatrimazafull.yachts			
34	hindilinks4u.digital			
35	hdmovies23.love			
36	hdmovie2.jetzt			
37	hdking.im			
38	full4movies.express			
39	filmyzilla.com.fj			
40	filmyworlds.lat			
41	filmyfly.im			
42	filmycity.cloud			
43	filmycab.icu			

44	filmy4web.sbs				
45	extramovies.stream				
46	extramovies.meme				
47	downloadhub4u.world				
48	dotmovies.run				
49	desiserials.sbs				
50	desiremovies.chat				
51	deewaniyatserial.net				
52	bdmusic25.com				
53	barsatein.sbs				
54	apnetv.show				
55	anupamastarplus.cam				
56	9xmovies.voto				
57	9xmovies.florist				
58	9xmovies.deal				
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63	5movierulz.shop				
64	1xbetmovie.biz				
65	1moviesfd.click				
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67	1flix.ing				
68	11xmovies.bar				

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Code 50000.01

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

CS (COMM) NO.

OF 2024

IN THE MATTER OF:

Star India Pvt. Ltd. & Anr

...Plaintiffs

Versus

Teriimeridooriyan.com & Ors.

...Defendants

### MEMO OF PARTIES

Star India Private Limited 1.

Star House, Urmi Estate,

95, Ganpatrao Kadam Marg,

Lower Parel (W),

Mumbai- 400013

Also, at:

Vatika Business Centre, Thapar House,

Gate No. 1, Eastern & Central Wing

3rd Floor, 124 Janpath

New Delhi -110001

Email: abhishek.praharaj@disney.com

Mobile No. +91 98181788790

Novi Digital Entertainment Pvt. Ltd. 2. -

Star House, Urmi Estate,

95, Ganpatrao Kadam Marg, Lower Parel (W),

Mumbai- 400013

Email: abhishek.praharaj@disney.com

Mobile No. +91 981817-88790

... Plaintiffs

### Versus

 Teriimeridooriyan.com playkaro.net

Email: abuse@dynadot.com

2. Desi-serial.mom

Email: abuse@netim.net

3. Castlehdapk.com

Email: castle0808@outlook.com

4. Barsatien.com

barsaateinmausampyarka.com

Email: abuse@dynadot.com

5. Hdmovie2.ren

hdmovie2.so

Email: abuse@dynadot.com

6. Ww4.5movierulz.team

5movierulz.cool

Email: abuse@namesilo.com

7. 7starhd1.live

Email: lol@gmail.com

8. Wyw.kehdoontumhein.com

Email: abuse@dynadot.com

9. Tvshowhub.online

Email: domain@atakdomain.com



Movieswatchonline0.com.pk
 watch-online-movies.com.pk

Email: moviesmanha@protonmail.com

11. 7starhd.auction

7starhd.dad

Email: bollyflix@protonmail.com

12. www.ziddidili.com

ziddidilserial.pk

Email: staff@pknic.net.pk

13. Ww1.6hiidude.me

6hiidude.vip

Email: abuse@dynadot.com

14. Hdmoviehub.bio

hdmoviehub.blog

Email: hdmoviehubforall@gmail.com

15. One.vegamovieshub.pro

one.vegamovieshub.boutique

Email: dmcavegamovieshub@gmail.com

16. Filmyzilla.pro.in

filmyzilla.org.bz

Email:filmyzilla.2050@gmail.com

17. Filmyfly.zip

filmyfly.dad

Email: admin@Filmyfly.net



### 18. Mkvhub.skin

Email: mkvadmin@protonmail.com

### 19. Bid.ibomma.link

ltd.ibomma.rsvp

Email:ibomma@protonmail.com; support@ibomma.one

### 20. 10starhd.de

10starhd.host

Email:bdmusic23life@gmail.com

# 21. ww9.5movierulz.top

ww7.5movierulz.vet

Email: movierulz.se@protonmail.com

# 22. NameSilo, LLC

1300 E. Missouri Avenue Suite A-110

Email: abuse@namesilo.com

### 23. Pknic SRS Inc.

435 Tariq Block, Garden Town,

Lahore, Pakistan

Email: staff@pknic.net.pk

# 24. Godaddy.com, LLC

Email: grievanceofficer@godaddy.com

14455 North Hayden Road, Suite 219

Scottsdale, AZ 85260, United States

# 25. Dynadot LLC

210 S Ellsworth Ave, #345 San Mateo,



CA, 94401 US

Email: nixi.grievance.officer@dynadot.com

26. Atak Domain Hosting

İstasyon Mahallesi Efe Sadık Caddesi No: 4

İç Kapı No: 2 Kartepe - Kocaeli

Email: domain@apiname.com; domain@atakdomain.com

27. Porkbun LLC

21370 SW Langer Farms Parkway, Suite-142-429

Sherwood, OR 97140, US

Email: support@porkbun.com;

abusegrievance-officer-in@porkbun.com

28. Spaceship, Inc.

4600 East Washington Street, Suite 305,

Phoenix, AZ 85034, USA

Email: support@spaceship.com

29. Tucows Domains Inc.

96 Mowat Avenue, Toronto,

Ontario, M6K 3M1, Canada

Email: compliance@tucows.com

30. Netim

264 Avenue Arthur Notebart,

Lille, Haut de France 59160, FR

Email: grievance-officier@netim.net; abuse@netim.net

31. Nicenic International Group Co. Limited

Room 1704 Hang Lung Center Paterson Street



Causeway Bay, Hong Kong

Email: support@nicenic.net; abuse@nicenic.net

32. Atria Convergence Technologies Private Limited

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

Email: nodal.term@actcorp.in; nodalofficer.ncr@actcorp.in,

jitesh.chathambil@actcorp.in

33. Bharat Sanchar Nigam Ltd

Bharat Sanchar Bhawan, Regulation Cell

5th floor, Harish Chandra Mathur Lane

Janpath, New Delhi -110001

E-mail: ddg reg@bsnl.co.in; sbkhare@bsnl.co.in;

averma@bsnl.co.in; sushmamishra71@gmail.com

34. Bharti Airtel Ltd.

Airtel Centre, Tower-A, 6th Floor

'A'Wing, Plot No.16, Udyog Vihar

Ph - IV, Gurgaon - 122016

E-mail: amit.bhatia@airtel.com

35. Hathway Cable & Datacom Pvt. Ltd.

'Rahejas',4 floor, Main Avenue

Santacruz (W), Mumbai-40054

E-mail: ajay.singh@hathway.net; dulal@hathway.net;

# sudhir.shetye@hathway.net

36. Mahanagar Telephone Nigam Ltd.

5<sup>th</sup> Floor, Mahanagar Doorsanchar Sadan

9, CGO Complex, Lodhi Road

New Delhi - 110003

E-mail: raco.mtnl@gmail.com; mtnlcsco@gmail.com;

gmracomtnl@gmail.com

37. Reliance Jio Infocomm Limited

RCP 14 (TC 23), Phase 4,

B-Block, 3rd Floor,

C 4 130 Twane- belapur Road,

Gansoli, Navi Mumbai- 400701

E-mail: 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;

neelakantan.an@ril.com

38. 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

E-mail: info@spectra.co; compliance@spectra.co

39. Tata Teleservices Ltd.



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Chinchpokli, Mumbai – 400033
E-mail: pravin.jogani@tatatel.co.in; anand.dalal@tatatel.co.in; satya.yadav@tatatel.co.in

Vodafone Idea 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
E-mail: smitha.menon@vodafoneidea.com;
pankaj.kapdeo@vodafoneidea.com;
Radhika.gokhale@vodafoneidea.com;
sheena.thukral@vodafoneidea.com;
lavati.sairam@vodafoneidea.com

41. Department of Telecommunications
Through Secretary,
Ministry of Communications and IT,
20, Sanchar Bhawan, Ashoka Road,
New Delhi – 110001
E-mail: secy-dot@nic.in, dirds2-dot@nic.in

42. 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

E-mail: cyberlaw-legal@meity.gov.in; gccyberlaw@meity.gov.in; pkumar@meity.gov.in, sathya.s@meity.gov.in

43. Ashok Kumar

... Defendants

Yatinder Garg | Astha Sehgal | Srishti Dhoundiyal (D/1330/2015) | (D/3817/2019) | (D/2488/2020)

Saikrishna and Associates Advocates for the Plaintiffs +91 9999064036

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Place: New Delhi

Date: 20 February 2024

Note: Defendant No. 1 along with Defendant Nos. 2 - 21 are the main contesting parties

### **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.