

**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-46/2024-DS-II****Dated: 08-11-2024****To,**

All Internet Service Licensee

**Subject: CS(COMM) 886 of 2024 Billionbrains Garage Ventures Private Limited & Anr. Vs. Shivansh Singh Impersonating As Chief Strategy Analyst/ Principal Chief Strategy Analyst Groww Securities & ORS before the Hon'ble High Court of Delhi.\_**

Kindly refer to the following:

- i. Hon'ble Calcutta High Court order dated **08.10.2024** on the subject.
- ii. MeitY letter dated **24.10.2023** to DOT to block the infringing website enumerated in MeitY Letter.

2. In view of the above, all the Internet Service licensees are hereby instructed to take immediate necessary action for blocking, above websites for compliance of the said Court order.

Digitally signed by  
Ram Prasad Meena  
Email: [dirds2-dot@nic.in](mailto:dirds2-dot@nic.in)  
Date: 08-11-2024 17:26:21

Encl:A/A

**Copy to:**

- i. Sh. V.Chinnasamy, Scientist E ([chinnasamy.v@meity.gov.in](mailto: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. Shilpi Sinha ([shilpi@fiduslawchambers.com](mailto:shilpi@fiduslawchambers.com)) Plaintiff Advocate for kind  
information and necessary action

- a. Take action as per Annexure.
- iii. IT wing of DoT for uploading on DoT websites please.

**File. No.4(1)/2024-CL**  
**Government of India**  
**Ministry of Electronics and Information Technology**

Electronic Niketan, 6, CGO Complex  
Lodhi Road, New Delhi – 110 003

Dated: 24<sup>th</sup> Oct, 2024

**Office Memorandum**

**Subject:** Order dated 08.10.2024 of the Hon'ble High Court of Delhi in CS (COMM) 886 of 2024 - Request for blocking of the website links

1. In this matter, the Plaintiff, BILLIONBRAINS GARAGE VENTURES PRIVATE LIMITED & ANR. filed the suit against the Defendants for permanent injunction restraining infringement of trademark and copyright (registered trademarks 'GROWW'), passing off, dilution, tarnishment, unfair competition, trade practice; misappropriation, rendition of accounts, delivery up and damages etc.,
2. In the said matter, the Hon'ble High Court vide order dated 08.10.2024 had grant an ex-parte ad-interim injunction in favour of the Plaintiffs and against the Defendants. The Court also directed Defendant No. 13, Ministry of Information and Electronics Technology ('MeitY') to block infringing websites. Reproducing the relevant extract from the said order:

*"53. Accordingly, till the next date of hearing, the following directions are issued:*

*IV. The defendant No. 13 is directed to suspend the following websites*

*www.egroww.com, www.egroww.com/h5,*

*www.egroww.com/h5/#/login, www.quickgroww.com,*

*www.growwebs.com/h5, www.igroww.com/h5,*

*www.fastgroww.com/h5, www.igroww.com/h5/#/home,*

*https://www.gazgipo.com/h5"*



3. In this connection, it is pertinent that Internet Service Providers enter into a license agreement and register themselves with the Department of Telecommunications.

4. In view of the above, the undersigned has been directed to request the Department of Telecommunications to take necessary action to give effect to the direction contained in the Hon'ble High Court's said order by blocking the said websites for the infringement as represented by the plaintiff.

Encl.: As above

नागराजन एन / NAGARAJAN N  
वैज्ञानिक 'सी' / Scientist 'C'  
भारत सरकार / Government of India  
इलेक्ट्रॉनिकी और सूचना प्रौद्योगिकी मंत्रालय  
Ministry of Electronics and Information Technology  
इलेक्ट्रॉनिक्स निकेतन, 6, सीजीओ कॉम्प्लेक्स, लोधी रोड,  
Electronics Niketan, 6, CGO Complex, Lodhi Road,  
नई दिल्ली-110003 / New Delhi-110003

N-6  
24/10/2024

(Nagarajan.N)

Scientist 'C'

Email: nagarajan.n@meity.gov.in

To:

Secretary  
Department of Telecommunications  
Sanchar Bhawan, 20, Ashoka Road  
New Delhi – 110 001



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

+ CS(COMM) 886/2024 & I.A. 41748/2024, I.A. 41749/2024, I.A. 41750/2024, I.A. 41751/2024, I.A. 41752/2024, I.A. 41753/2024, I.A. 41754/2024, I.A. 41755/2024

**BILLIONBRAINS GARAGE VENTURES PRIVATE LIMITED & ANR.** .....Plaintiffs

Through: Mr. Pravin Anand, Ms. Tusha Malhotra, Ms. Tanvi Bhatnagar, Advocates (M:9999748836)

versus

**SHIVANSH SINGH IMPERSONATING AS CHIEF STRATEGY ANALYST/ PRINCIPAL CHIEF STRATEGY ANALYST GROWW SECURITIES & ORS.** .....Defendants

Through: None.

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

**ORDER**  
**08.10.2024**

%

**I.A. 41750/2024 (Exemption from filing original, clearer copies, translated 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 original, clearer and translated copies of the documents.
2. Exemption is granted, subject to all just exceptions.
3. Plaintiffs shall file original, clearer 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.

CS(COMM) 886/2024



**I.A. 41749/2024 (Application seeking leave to file additional documents)**

5. This is an application under Order XI Rule 1(4) read with Section 151 CPC as amended by the Commercial Courts Act, 2015, seeking leave to file additional documents.

6. The plaintiffs, if they wish to file additional documents at a later stage, shall do so strictly as per the provisions of Commercial Courts Act, 2015, and the Delhi High Court (Original Side) Rules, 2018.

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

**I.A. 41753/2024 (Application under Section 149 read with Section 151 of CPC for extension from filing court fees)**

8. The present is an application under Section 149 read with Section 151 of CPC seeking extension of time from filing the court fees.

9. Learned counsel for the plaintiffs submits that the requisite court fees shall be filed within a period of one week. Liberty is so granted.

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

**I.A. 41751/2024 (Exemption from instituting Pre-Institution Mediation)**

11. The present is an application under Section 12A of the Commercial Courts Act, 2015, read with Section 151 of CPC, seeking exemption from undergoing Pre-Institution Mediation.

12. Having regard to the facts of the present case and in the light of the judgment of Supreme Court in the case of *Yamini Manohar Versus T.K.D. Keerthi*, 2023 SCC OnLine SC 1382, and Division Bench of this Court in *Chandra Kishore Chaurasia Versus RA Perfumery Works Private Ltd.*, 2022 SCC OnLine Del 3529, exemption from attempting Pre-Institution Mediation, is granted.

13. Accordingly, the application stands disposed of.



**I.A. 41752/2024 (Application under Section 151 of CPC for exemption from service through Email to defendant nos. 1 and 2)**

14. The present is an application under Section 151 CPC, seeking exemption from advance service to the defendants.

15. The plaintiff seeks urgent interim relief, and therefore, in the peculiar facts and circumstances of this case, exemption from effecting advance service upon the defendants, is granted.

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

**I.A. 41755/2024 (Application under Section 151 of CPC for issuance of directions)**

17. The present is an application under Section 151 of the Code of Civil Procedure, 1908 (“CPC”), for issuance of directions to Bangur Nagar Police Station, Mumbai and the Cyber Cell Department, Goregaon Police Station, Brihan Mumbai City, Maharashtra to file status reports in the complaints filed by the plaintiffs.

18. It is submitted that the plaintiffs through its officials have filed two Cyber Cell complaints against the defendant nos. 1 and 2 before the National Cyber Cell Crime Reporting Portal registered vide Acknowledgement Nos. 21906240057412 and 21907240066304.

19. Thus, the present application has been filed to ensure that the Status Reports in the complaints filed by the plaintiffs are brought before this Court.

20. Accordingly, the Bangur Nagar Police Station, Mumbai is directed to file status report in the complaints submitted by the plaintiffs, in a sealed cover before this Court.



21. The Cyber Cell Department, Goregaon Police Station, Brihan Mumbai City, Maharashtra is directed to file status reports in the complaints submitted by the plaintiffs registered vide Acknowledgement Nos. 21906240057412 and 21907240066304, in a sealed cover before this Court.

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

**I.A. 41754/2024 (Application under section 80 of the CPC for exemption from 2 months notice to the Government of India)**

23. Learned counsel appearing for the plaintiff submits that the two government entities, i.e., DOT & Meity have been impleaded as proforma parties, on account of the violations being committed and the relief sought.

24. In view of the averments made in the application, the same is allowed.

25. Accordingly, the application is disposed of in the aforesaid terms.

**CS(COMM) 886/2024**

26. Let the plaint be registered as suit.

27. Upon filing of the process fee, issue summons to the 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.

28. 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.

29. List before the Joint Registrar (Judicial) for marking of exhibits, on 21<sup>st</sup> November, 2024.


30. List before the Court on 05<sup>th</sup> February, 2025.

**I.A. No. 41748/2024 (Application under Order XXXIX Rules 1 and 2 CPC)**


31. The present suit has been filed for permanent injunction restraining infringement of trademark and copyright, passing off, dilution, tarnishment, unfair competition, trade practice, misappropriation, rendition of accounts, damages, delivery up, etc.

32. It is submitted that the present suit has been preferred by the plaintiffs against the defendants, as defendant nos. 1 and 2, without any authorization and prior permission are using, advertising, offering services and seeking money from the public at large, under the trademarks of the plaintiffs, i.e.



**GROWW** and  and further leading to infringement, passing off, misappropriation, dilution and tarnishment of the reputation and goodwill earned by the plaintiffs on account of its well known trademarks, tradename and business. Further, the defendant nos. 1 and 2 are impersonating as employees of the plaintiffs with an intention to defraud the general public and gain illegal profits. Aggrieved by the infringing acts of defendant Nos. 1 and 2, in the trademarks and copyright in the plaintiff's artistic logo, i.e.,



 the plaintiffs have preferred the present suit before this Court. The rest of the defendants have been arrayed in the present suit to ensure the




compliance of the orders passed by this Court and to ascertain the exact details and whereabouts of the defendant nos. 1 & 2.

33. It is submitted that the plaintiff no. 1, Billionbrains Garage Ventures Pvt. Ltd., is primarily engaged in the business of: (a) software designing, development, customization, testing, and benchmarking, designing, developing computer software and solutions and the business of providing, building, and organizing of software tools; (b) marketing of licensed software; and (c) providing ancillary services to group companies.

34. It is submitted that Groww Inc, which was engaged in the business of investing in and holding the securities of various companies forming part of the 'Groww' group, was the prior registered proprietor of the marks



GROWW and  of which, the plaintiff no.1 became the subsequent registered proprietor.


35. It is submitted that the plaintiff no. 2 is popularly recognized as India's no.1 stock broker as per data available with stock exchange and trading platform with more than 1 crore active customers, where users can find do-it-yourself investment solutions regarding Stocks, Mutual Funds, Futures, Options, etc. and invest their money without any hassle. The plaintiff no.2 provides a platform to transact in stocks and mutual funds and does not advise or recommend any stocks, mutual funds and helps the investors by doing the following:


- a) Providing 100% paperless online free Demat and trading account opening;
- b) Being transparent about fees and charges involved while investing in a product;



c) By providing technical information with advanced charts, well-designed line and candlestick charts that indicate share price movements, and market indices, along with more details about all registered and listed companies.



36. It is submitted that the trademarks GROWW and , were first adopted by Groww Inc. when the said company was incorporated in December, 2017. The marks are coined and arbitrary, and are associated with the services of the plaintiffs alone by the public. Since its adoption, the marks have been used continuously and extensively in relation to the services provided by the company and were also an integral part of the company's trade name. The details of the trademark registrations in India are as under:

SN	Applicati o n No.	Mark	Clas s	Dated	User Claim
1	3814844	GROW W	36	24.04.20 18	04.12.20 17
2	4291788		36	12.09.20 19	04.12.20 17

37. It is submitted that the above registered trademarks, are valid and subsisting on the register of the Registrar of Trade Marks. The adoption, use and advertising of identical or similar trademarks by any third party for the above-mentioned services without the consent or license of the plaintiffs, would amount to an infringement of the plaintiffs' trademarks.



38. It is submitted that the plaintiffs are the owners of artistic work in the



brand logo, which is capable of protection under the Copyright Act, 1957. The logo was created on work for hire contract by virtue of which the plaintiffs are the owners of the said artistic work in the logo. Further, the plaintiffs have the exclusive right to use or reproduce or license the said works as per the provisions of the Copyright Act, 1957. The plaintiff, consequently, also, possesses the right to commercialize services under the said artistic work and to stop any third party from misusing/ using its artistic work.



39. It is submitted that the plaintiffs marks GROWW/ have been used continuously and uninterruptedly since its adoption. Further, the plaintiffs' platform **GROWW** has become massively popular among members of the public to meet their investment needs and gained immense trust of the public. By virtue of the reliability, effectiveness and excellent efficacy of the services offered by the plaintiffs, the plaintiffs, and the subject trademarks, brand logo and tradename have gained trust among the members of the trade and public at large. The services offered by the plaintiffs under the subject trademarks, copyright, and tradename have acquired tremendous reputation and goodwill across the venture capital financing industry.

40. It is submitted that the plaintiffs also manage and operate the website <https://groww.in/>, which was registered on April 1, 2016. The plaintiffs are

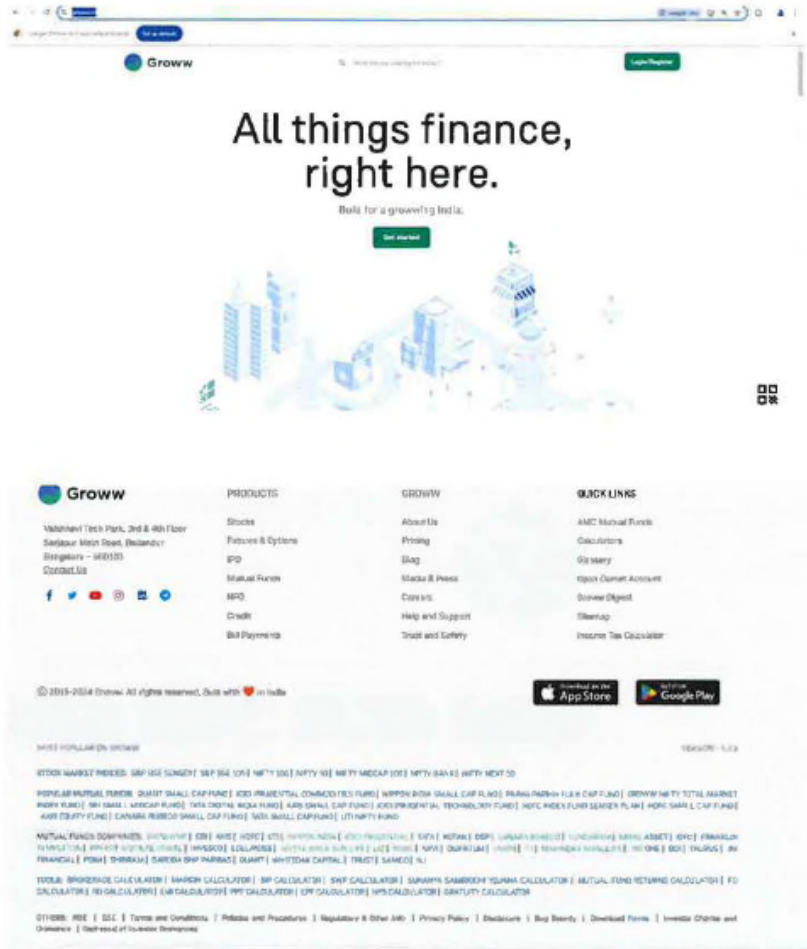


using its marks/ brand logo **GROWW/** on its website continuously

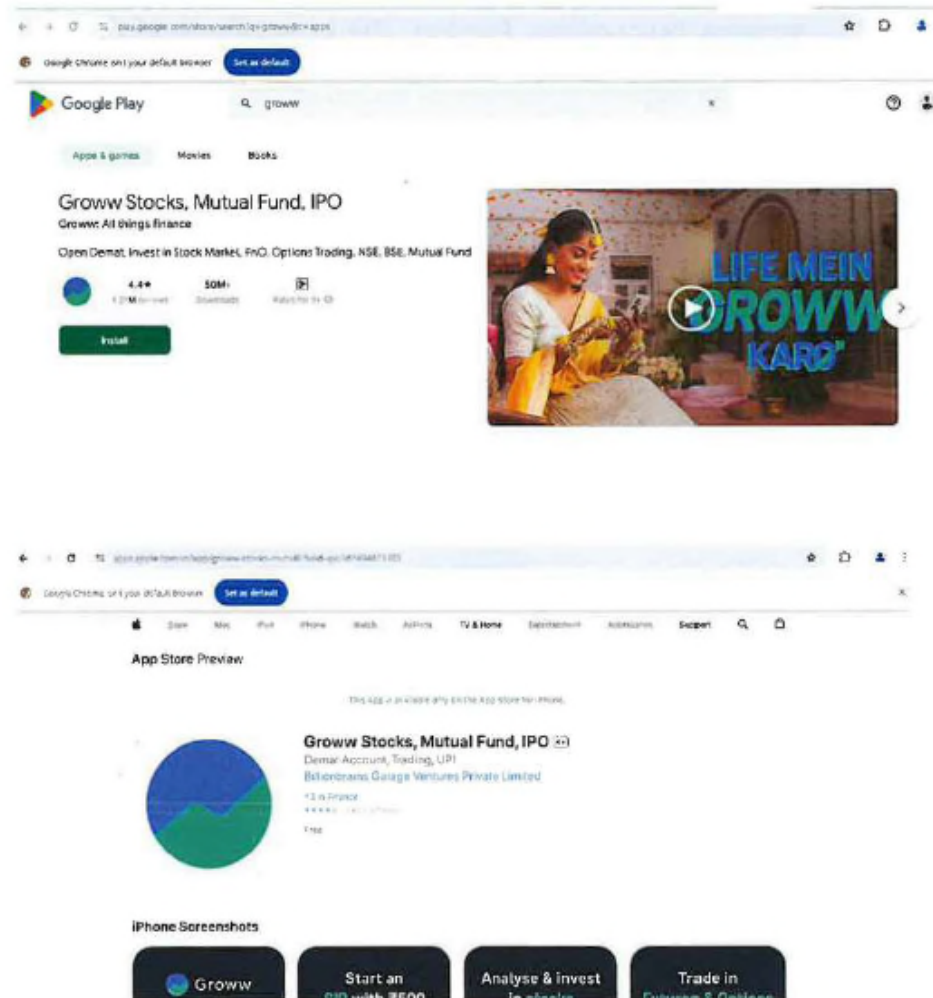




and uninterrupted. Screenshots of the plaintiffs' website depicting the use of its trademark/ logo is reproduced herein below:



41. It is submitted that the plaintiffs also operate and manage a mobile application under the name 'GROWW' which can be downloaded by the users and it is available for download on Google Play Store and Apple App Store. Screenshot of the mobile application as available on Google Play Store and Apple Play Store, are reproduced below:



42. It is submitted that in June-September, 2024, the plaintiffs' officials started receiving emails/ complaints, wherein, various people were enquiring about the authenticity of one Mr. Shivansh Singh i.e. defendant no. 1, who was claiming to be the Chief Strategy Analyst/ Principal Chief Strategy Analyst for the plaintiffs and advising them and other people on WhatsApp Groups regarding investing in Upper Circuit Stocks. Further, the defendant no. 1 along with defendant no.2 were also providing people links of various GROWW related apps and websites, wherein, the people could login, make their account, and make required payments for investing in stocks.



43. Therefore, from the above instances it is verily believed that the defendant nos. 1 and 2 are working clandestinely and are doing various activities to defraud the general public by using the plaintiffs' trademarks, brand logo and tradename. It is submitted that the following are details with regard to the numbers, websites, WhatsApp groups, bank account numbers that are operated by the defendant nos. 1 and 2 for their infringing activities:

Numbers	
	9216365829
	7972460291
	7048308591
	7028546237
	8905514660
	9685091961
	6232155039
	9989319668
	8197857815
	8421580972
	7357149759
	7249413328
	7678081731
	7400179083
	9157416739
	6232134717



	<p>9972304554  7721056487  9660585264  9052263357  9157516194  9500679022  9116789403  8769576526</p>
<b>Infringing Websites</b>	<p><a href="http://www.egroww.com">www.egroww.com</a>  <a href="http://www.egroww.com/h5">www.egroww.com/h5</a>  <a href="http://www.egroww.com/h5/#/login">www.egroww.com/h5/#/login</a>  <a href="http://www.quickgroww.com">www.quickgroww.com</a>  <a href="http://www.growwebs.com/h5">www.growwebs.com/h5</a>  <a href="http://www.igroww.com/h5">www.igroww.com/h5</a>  <a href="http://www.fastgroww.com/h5">www.fastgroww.com/h5</a>  <a href="http://www.igroww.com/h5/#/home">www.igroww.com/h5/#/home</a>  <a href="https://www.qazgipo.com/h5">https://www.qazgipo.com/h5</a></p>
<b>WhatsApp Groups</b>	<p>VIP 114 Groww Capital Group  A53-Groww Capital Group  C4_Groww Capital Group  H1-Groww Capital Group  A15Groww Capital Group  C2 Groww Capital Group  Groww Capital Group-B3  VIP55-Groww Capital Group  VIP85- Groww Capital Group  A-3 Groww Capital Group  VIP62 Groww Capital Group</p>





<b>Bank Accounts</b>	Name: Marino Impex Bank Account Nos. 259016862728 Name: IndusInd Bank IFSC: INDB0001031
	Bank Account Name: Corporate Bank Account Nos. 016761900001341 Name: Yes Bank Address: Jind, Haryana IFSC: YEB0000167
	Bank Account Name: Arya Power Techa Enterprise Bank Account Nos. 9444259626020424 Name: Jana Bank Address: Kodambakkam IFSC: JSFB0004599
	Bank Account Name: Sri Jagannath Janakalyan Foundation Trust Bank Account Nos. 10127219708 Name: IDFC Bank Current Address: Bhubaneshwar IFSC: IDFB00602421
	Bank Account Name – Bytebridges It Solutions (OPC) Private Limited Bank Account Number – 071263200000860 Bank Name: Yes Bank Bank Address – Vidhyadhar Nagar Jaipur IFSC- YESB0000712
	Bank Account Name – Freshiris Garments Pvt. Ltd. Bank Account Number – 60491139058 Bank Name: Bank of Maharashtra Bank Name – 01252-Barasat IFSC- MAHB0001252



<p>Account Name –Shree Charbhuj Associates Bank Account Nos.- 00000043087449025 Bank Name: SBI Branch – Bhilwara Main IFSC- SBIM0006335</p> <p>Bank Account Name: Happy Tour and Travellers Bank Account Number: 10179853075 Bank name: IDFC Bank Branch: Surat IFSC: IDFB0042261</p> <p>Bank Account Name: Abhay Photo studio Bank Account Nos.: 301002000000573 Bank Name :IOB Address: Near Janta BichayarKendra chhota Bazar Ward IFSC – IOBA0003010</p> <p>Bank Account Name: Melin Movies Bank Account Number: 258994173606 IFSC: INDB0001656 Name: IndusInd Bank Address- Textile Market ring Road</p> <p>Bank Account Name- Furniture House Bank Account Number- 60101199399 Bank Name- IDFC Bank Address- Bijnor Branch IFSC: IDFB0022162</p> <p>Bank Account Name: Adil Pasha Bank Account Number: 53230004401225 Name: ESAF Bank Address- Bengaluru IFSC: ESMF0001336</p>
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	<p>Bank Account Name: Tousif Pasha  Bank Account Number:  53230004401235  Name: ESAF Bank  Address- Bengaluru  IFSC: ESMF0001336</p>
	<p>Bank Account Name: Style Fashion  Bank Account Number:  00000042913723602  Name: State Bank of India, New  Market  Address- Kolkatta  IFSC: SBIN0004662</p>
	<p>Bank Account Name: Shiv shakti  Trading  Bank Account Number:  20100026387942  Name: Bandhan  Address- Ganesh Tower  IFSC: BDBL0001534</p>
	<p>Bank Account Name: SRI Jagannath  Janakalyan Foundation Trust  Bank Card Number: 10127219708  Name: IDFC Bank  Address- Bhubaneswar Branch  IFSC: IDFB0060241</p>
	<p>Bank Account Name: Vijayshree  Enterprises  Bank Account Number: 89057746177  Name: IDFC BANK  Address- Nashik Deolali Road Branch  IFSC: IDFB00489</p>
	<p>Bank Account Name: Mahadev  Enterprise  Bank Account Number: 259825880116  Name: Indusind Bank</p>



	<p>Address- Ankleshwar Branch IFSC: INDB0000415</p> <p>Account Name: Shiv Shakti Trading Bank Account Number: 20100026387942 Name: Bandhan Address- Ganesh Tower IFSC: BDBL0001534</p> <p>Account Name: M Z Enterprise (Muhmud Zamil Hague) Bank Account Number: 20100028359700 Name: Bandhan Address- Hatigaon branch IFSC: BDBL0001768</p> <p>Bank Account Name: S.S. Enterprise Bank Account Number: 10178511021 Name: IDFC Limited Address- Bhulabhai Desai Road branch IFSC: IDFB0040105</p> <p>Bank Account Name: GS Traders Bank Account Number: 250000012300 Name: IndusInd Bank Address- Karol Bagh IFSC: INDB000069</p> <p>Bank Account Name: Mark World Enterprises Bank Account Number: 1003229757 Name: IDFC Bank Address- Somajiguda IFSC: IDFB008020</p> <p>Bank Account Name: RS TRADERS Bank Account Number: 43071906013 Name: State Bank of India Address- Ojhar</p>
	IFSC: SBIN0001196





44. It is submitted that the defendant no. 15 operates a platform under the name 'Softonic', wherein, users can login and download multiple mobile applications. It is submitted that some unknown defendants have created fake mobile applications on the platform of defendant no. 15 and are using the plaintiffs' registered trademarks, brand logo and tradename. It is submitted that none of these apps, as provided in the below table, are authorized or official apps created by the plaintiffs. Further, it is believed that these apps are used by unknown defendants to defraud the members of general public, while using plaintiffs' goodwill and reputation. The infringing links of the mobile applications, are as below:

S.NO	LINKS
1	<a href="https://groww-stocks-mutual-fund.en.softonic.com/android">https://groww-stocks-mutual-fund.en.softonic.com/android</a>
2	<a href="https://groww-stocks-mutual-fund.softonic.nl/android">https://groww-stocks-mutual-fund.softonic.nl/android</a>
3	<a href="https://groww-stocks-mutual-fund.softonic.com.tr/android">https://groww-stocks-mutual-fund.softonic.com.tr/android</a>
4	<a href="https://groww-stocks-mutual-fund.softonic.kr/android">https://groww-stocks-mutual-fund.softonic.kr/android</a>
5	<a href="https://groww-stocks-mutual-fund.softonic.ru/android">https://groww-stocks-mutual-fund.softonic.ru/android</a>
6	<a href="https://groww-stocks-mutual-fund.softonic-th.com/android">https://groww-stocks-mutual-fund.softonic-th.com/android</a>



7	<a href="https://groww-stocks-mutual-fund.softonic.com.br/android?ex=RAMP-2046.2">https://groww-stocks-mutual-fund.softonic.com.br/android?ex=RAMP-2046.2</a>
8	<a href="https://groww-stocks-mutual-fund.softonic.com/android">https://groww-stocks-mutual-fund.softonic.com/android</a>
9	<a href="https://groww-stocks-mutual-fund.softonic-id.com/android">https://groww-stocks-mutual-fund.softonic-id.com/android</a>
10	<a href="https://groww-stocks-mutual-fund.softonic.cn/android">https://groww-stocks-mutual-fund.softonic.cn/android</a>
11	<a href="https://groww-stocks-mutual-fund.de.softonic.com/android?ex=RAMP-2125.0">https://groww-stocks-mutual-fund.de.softonic.com/android?ex=RAMP-2125.0</a>
12	<a href="https://groww-stocks-mutual-fund.softonic.jp/android">https://groww-stocks-mutual-fund.softonic.jp/android</a>
13	<a href="https://groww-stocks-mutual-fund.fr.softonic.com/android?ex=RAMP-2125.1">https://groww-stocks-mutual-fund.fr.softonic.com/android?ex=RAMP-2125.1</a>
14	<a href="https://groww-stocks-mutual-fund.softonic.pl/android">https://groww-stocks-mutual-fund.softonic.pl/android</a>
15	<a href="https://groww-stocks-mutual-fund.softonic-ar.com/android">https://groww-stocks-mutual-fund.softonic-ar.com/android</a>
16	<a href="https://groww-stocks-mutual-fund.vi.softonic.com/android?ex=RAMP-2125.1">https://groww-stocks-mutual-fund.vi.softonic.com/android?ex=RAMP-2125.1</a>

45. It is also submitted that since the defendant nos. 1 and 2 are running a big fraud and cheating people of their hard earned money by using



plaintiffs' trademarks, brand logo and tradename, therefore, the plaintiffs to protect their rights, as well as the rights of the people, have filed a criminal complaint against the defendant no.1, along with other similar entities/ persons, who were impersonating the plaintiffs before the Bangur Nagar Police Station, Mumbai. Further, the plaintiffs through its officials have also filed two Cyber Cell complaints against the said defendants before the National Cyber Cell Crime Reporting Portal registered vide Acknowledgement Nos. 21906240057412 and 21907240066304.

46. It is submitted that the use of the identical marks **GROWW** and



by the defendant nos. 1 and 2 and unknown defendants are bound to cause further confusion and deception in the minds of the public and members of the trade and in fact is actually causing, as evident from the communications placed on record, that they are connected or associated with the plaintiffs. An ordinary person is bound to be misled to believe that the defendant nos.1 and 2 and unknown defendants have an association/relationship/ sponsorship/affiliation/authorization or nexus with the plaintiffs and thus fall into the false trap being cast by the defendant nos. 1 and 2 and unknown defendants.

47. Further, it is submitted that the adoption and use of the plaintiffs' trademarks/tradename by the defendant nos. 1 and 2 and unknown defendants, without any authorization or consent, and by using false and fictitious identities to resemble the plaintiffs' Companies, is a clear attempt by them in misrepresenting, and causing confusion to the public that they are in some manner associated or connected with the plaintiffs. Further, such



actions of defendant nos. 1 and 2 and other unknown defendants, are injuring the valuable goodwill and reputation of the plaintiffs, while causing wrongful loss to the ordinary members of public. It is submitted that from the instances mentioned above, it can be clearly seen that the members of public have been led to believe through misrepresentations that the defendant no. 1 and 2 are employees of plaintiffs and they are defrauding the public of their money in plaintiffs' name.

48. It is submitted that the defendants' acts of rendering fake financial services and defrauding the members of the public by looting and cheating them of their hard-earned money while using the plaintiffs intellectual property rights including the plaintiffs well-known trademarks greatly prejudice the plaintiffs reputation and goodwill, earned by them by rendering services of extremely high standards. The defendant nos. 1 and 2's activities are bound to cast the plaintiffs in an unflattering light, create unwarranted legal claims against the plaintiffs, thereby tarnishing and significantly eroding the plaintiffs' goodwill and reputation for no fault of the plaintiffs. Therefore, the defendant nos. 1 and 2's impugned illegal and infringing activities, as well as those activities in the future, which may bring disrepute to the plaintiffs and may tarnish its reputation, need to be subject to orders of the injunction.

49. It is submitted that the defendant nos.1 and 2 have also reproduced, without any prior authorization and permission from the plaintiffs, its brand



logo, wherein Copyright subsists. The said action is in violation to the plaintiffs' rights and amounts to infringement of Copyright which subsists in the artistic work of the logo. The said unauthorized reproduction



by the defendant nos. 1 and 2 of the plaintiffs artistic work is clearly an attempt to make the impugned website and mobile applications look authentic and thereby to induce the members of public into doing business with the defendant nos. 1 and 2.

50. It is submitted that owing to the nature of the infringing activities of defendant nos. 1 and 2, it is impossible for the plaintiffs to keep a track of the representatives involved and/or identify every single phone number involved in the investment fraud scheme being run by the defendant nos. 1 and 2. Therefore, the plaintiffs in the present case are seeking indulgence for grant of John Doe orders against the unknown defendants.

51. Attention of this Court has been drawn to the various complaints received from the general public, who have been duped on account of the fraudulent activities carried out by defendant nos. 1 and 2. One such complaint is reproduced as under:

----- Forwarded message -----

From: **anukta ghosh** <[anukta.ghosh@gmail.com](mailto:anukta.ghosh@gmail.com)>

Date: Sat, 13 Jul 2024 at 4:48 PM

Subject: Complaint regarding financial cyber fraud

To: <[dccyber@kolkatapolice.gov.in](mailto:dccyber@kolkatapolice.gov.in)>

Cc: [wb.secyhome@gmail.com](mailto:wb.secyhome@gmail.com) <[wb.secyhome@gmail.com](mailto:wb.secyhome@gmail.com)>, [sunil.bissa@groww.in](mailto:sunil.bissa@groww.in)

<[sunil.bissa@groww.in](mailto:sunil.bissa@groww.in)>, <[cp@kolkatapolice.gov.in](mailto:cp@kolkatapolice.gov.in)>, <[lalit.keshre@gmail.com](mailto:lalit.keshre@gmail.com)>,

<[santosh.jayaram@groww.in](mailto:santosh.jayaram@groww.in)>, <[boudhayan.ghosh@groww.in](mailto:boudhayan.ghosh@groww.in)>

Dear Ma'am/ Sir,

I am writing to inform you that I believe that I am a victim of cyber fraud. My life's savings of about 1.9 Cr has been taken by Groww Securities through money transfers made for investments during the period of 18th June to 11th July 2024. I thought t I was dealing with the financial platform Groww , but it appears I was rediectd to fraudulent website called Groww Securities under the pretext that servers were down. Initially I was approached with a competition called GTC Global Investment Competition to vote for the Principal Strategy Analyst at Groww, India, Mr. Shivansh Singh. Below are the contact numbers associated with Shivansh Singh and his team.





Shivansh Singh phone nos

+91 7972460291 - principal no for communication

Other nos of his in the group where he was the admin and moderator

+91 7048308591

+91 7028546237

+91 8905514660

+91 9685091961

Customer service nos

+91 7721056487

+91 7376646296

The operation involved initially stock trading strategies for day trading. It could be done through one's own existing platform. Subsequently we were to vote for him daily from 6th June for the above competition which purportedly would bring honour to the country and if he won he would get 10 billion funds to manage, as India head. In return we were provided with investment strategy. Shivansh Singh would daily inform us that regular stocks are unperforming and back it up with data, and suggested daily about investing in UC - upper circuit stocks and IPOs that were suggested by him, through Groww's International trading platform.

For that he referred his customer service who in turn would one through the process of registering for an international account and be guided on how to operate the site. Apart from daily UC stocks, one was advised to apply for the suggested IPOs through the site and then if allocated, he would ask us to subscribe to it. I subscribed to 4 such IPOs one after the other in a series over last week of June till 10th July. They would allocate random shares for one IPO and block the so called profits from the consequent sale of the shares of the said IPO post its listing. And then they would ask me to top up the blocked balance for the next allocated IPO by providing additional funds from my end to buy allocated shares of the next IPO, the allocation quantity being decided solely by them. They always maintained that I could withdraw funds once my IPO got listed but it became a loop of one IPO after the other. Realising that something is amiss I attempted to retrieve my principal amount on the 11th of July. It was then that they informed me that I need to pay an additional 1 cr as 15% tax of the total "profits" earned.

I have detailed the sequence of events, phone numbers, screenshots of conversations over WhatsApp, website link, my bank transfer details and the details of the various regulatory banks that they asked me to transfer my money to in the following Google document.

<https://docs.google.com/document/d/1UVBfAziNYA1NDMBUvmWClF8wO-arCaAyDc-9GlvFAA/edit?usp=sharing>

The WhatsApp groups are still active as evening of 12th July, Friday, and the site link is functional, as of today.





My bank accounts from where I have made online and physical transfers :

Anukta M Ghosh

Axis Bank Ltd.

Branch - Ballygunge Phari, Kolkata

A/c - 919010040136165

And

Anukta M Ghosh

HSBC, Ramani Chatterjee Rd., kolkata - 700029

A/c - 025301003006

My PAN no. AHPPM3919E

I earnestly request your help in retrieving my principal amount , as at the age of 50, these funds are all I have. Part of the money swindled was from the sale of a flat that was in my father's name, which he had willed to me and also had made me the power of attorney to sell. These funds, along with my own savings were distributed mainly in Stocks with Axis Bank Demat a/c and Mutual Funds and some in Fixed deposits. My father aged 80 is incapacitated and I also have a younger sister who requires medical care and attention. Additionally, my daughter is finishing school and will soon be attending college, incurring further expenses for her higher education.

I sincerely hope that appropriate action will be taken against the perpetrators.

Sincere Regards,

Anukta Mukherjee Ghosh

email id. [anukta.ghosh@gmail.com](mailto:anukta.ghosh@gmail.com)

+91 9830007756

52. 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.

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

- I. The defendant nos. 1 and 2, their representatives, principal officers, proprietor/partners, servants, agents, their affiliates, subsidiaries, distributors, and all others acting for and on their behalf, are restrained from using plaintiffs' registered trademarks **GROWW** and



and/or any other mark, which is identical or deceptively similar to the plaintiffs' registered trademarks, including, as part of domain name, WhatsApp groups, Telegram groups, mobile applications, Email Ids, etc. or in any manner in course of the trade, leading to infringement, passing off, unfair competition, tarnishment, dilution and infringement of copyright of the plaintiffs' registered



trademarks **GROWW** and .

- II. The defendant nos. 3 to 11 are directed to immediately freeze all the bank accounts of the defendant nos. 1 and 2, as mentioned in '*Annexure – A*' of the present order, and provide documents to the plaintiffs relating to opening and operating of the said bank accounts, including KYC records of the account holder and complete account statement from opening till date, or any other such relevant document



which is in power and possession, which would aid in disclosure of the identity and other details of the account holders.

- III. The defendant no. 12 is directed to suspend and produce all details, call records, location history, and KYC particulars relating to the phone numbers mentioned in '*Annexure – B*' of the present order, and any other such relevant document, which is in power and possession which would aid in disclosure of the identity and other details of the holder of the mobile numbers.
- IV. The defendant No. 13 is directed to suspend the following websites  
[www.egroww.com](http://www.egroww.com), [www.egroww.com/h5](http://www.egroww.com/h5),  
[www.egroww.com/h5/#/login](http://www.egroww.com/h5/#/login), [www.quickgroww.com](http://www.quickgroww.com),  
[www.growwebs.com/h5](http://www.growwebs.com/h5), [www.igroww.com/h5](http://www.igroww.com/h5),  
[www.fastgroww.com/h5](http://www.fastgroww.com/h5), [www.igroww.com/h5/#/home](http://www.igroww.com/h5/#/home),  
<https://www.gazgipo.com/h5>.
- V. The defendant nos. 16 and 17 are directed to produce all details and particulars relating to the Registrant of the aforesaid websites, including Registrant details, phone numbers, payment details, subscriber data, and any other such relevant document which is in power and possession which would aid in disclosure of the identity and other details of the Registrant.
- VI. The defendant no. 15 is directed to take down/ suspend the links of the mobile applications, mentioned as follows:

S.NO	LINKS
1	<a href="https://groww-stocks-mutual-fund.en.softonic.com/android">https://groww-stocks-mutual-fund.en.softonic.com/android</a>



2	<a href="https://groww-stocks-mutual-fund.softonic.nl/android">https://groww-stocks-mutual-fund.softonic.nl/android</a>
3	<a href="https://groww-stocks-mutual-fund.softonic.com.tr/android">https://groww-stocks-mutual-fund.softonic.com.tr/android</a>
4	<a href="https://groww-stocks-mutual-fund.softonic.kr/android">https://groww-stocks-mutual-fund.softonic.kr/android</a>
5	<a href="https://groww-stocks-mutual-fund.softonic.ru/android">https://groww-stocks-mutual-fund.softonic.ru/android</a>
6	<a href="https://groww-stocks-mutual-fund.softonic-th.com/android">https://groww-stocks-mutual-fund.softonic-th.com/android</a>
7	<a href="https://groww-stocks-mutual-fund.softonic.com.br/android?ex=RAMP-2046.2">https://groww-stocks-mutual-fund.softonic.com.br/android?ex=RAMP-2046.2</a>
8	<a href="https://groww-stocks-mutual-fund.softonic.com/android">https://groww-stocks-mutual-fund.softonic.com/android</a>
9	<a href="https://groww-stocks-mutual-fund.softonic-id.com/android">https://groww-stocks-mutual-fund.softonic-id.com/android</a>
10	<a href="https://groww-stocks-mutual-fund.softonic.cn/android">https://groww-stocks-mutual-fund.softonic.cn/android</a>
11	<a href="https://groww-stocks-mutual-fund.de.softonic.com/android?ex=RAMP-2125.0">https://groww-stocks-mutual-fund.de.softonic.com/android?ex=RAMP-2125.0</a>
12	<a href="https://groww-stocks-mutual-fund.softonic.jp/android">https://groww-stocks-mutual-fund.softonic.jp/android</a>
13	<a href="https://groww-stocks-mutual-fund.fr.softonic.com/android?ex=RAMP-2125.1">https://groww-stocks-mutual-fund.fr.softonic.com/android?ex=RAMP-2125.1</a>
14	<a href="https://groww-stocks-mutual-fund.softonic.pl/android">https://groww-stocks-mutual-fund.softonic.pl/android</a>



15	<a href="https://groww-stocks-mutual-fund.softonic-ar.com/android">https://groww-stocks-mutual-fund.softonic-ar.com/android</a>
16	<a href="https://groww-stocks-mutual-fund.vi.softonic.com/android?ex=RAMP-2125.1">https://groww-stocks-mutual-fund.vi.softonic.com/android?ex=RAMP-2125.1</a>

VII. The defendant no.18 is directed to suspend from its platform groups/channels mentioned, as follows:

- <https://t.me/GROWW8>
- [https://t.me/GROWW\\_TIPS](https://t.me/GROWW_TIPS)
- [https://t.me/Groww\\_tips0](https://t.me/Groww_tips0)
- [https://t.me/groww\\_trenfing](https://t.me/groww_trenfing)
- [https://t.me/GROWWMUTUALFUND\\_bot](https://t.me/GROWWMUTUALFUND_bot)
- [https://t.me/GROWW\\_TIPS\\_TRADING\\_APP](https://t.me/GROWW_TIPS_TRADING_APP)
- [https://t.me/Groww\\_Upstox\\_Intraday\\_Angelone](https://t.me/Groww_Upstox_Intraday_Angelone)
- [https://t.me/Groww\\_Upstox\\_Angelone\\_stocks\\_one](https://t.me/Groww_Upstox_Angelone_stocks_one)
- [https://t.me/upstox\\_angel\\_one\\_groww\\_zerodha](https://t.me/upstox_angel_one_groww_zerodha) Telegram
- [https://t.me/GROWW\\_TIPS\\_TRADING\\_Angelone\\_tips](https://t.me/GROWW_TIPS_TRADING_Angelone_tips)
- [https://t.me/GROWW\\_TRADING\\_BEAST\\_CALLS\\_TIPS\\_2](https://t.me/GROWW_TRADING_BEAST_CALLS_TIPS_2)
- [https://t.me/Zerodha\\_Kite\\_Upstox\\_Groww\\_Tips\\_2](https://t.me/Zerodha_Kite_Upstox_Groww_Tips_2)

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

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

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

57. Compliance of Order XXXIX Rule 3 CPC, be done, within a period



of two weeks from today.

58. List before the Court on 05<sup>th</sup> February, 2025.

**MINI PUSHKARNA, J**

**OCTOBER 8, 2024**

au





**Annexure – A**

Anukta M Ghosh

Axis Bank Ltd.

Branch - Ballygunge Phari, Kolkata

A/c - 919010040136165

And

Anukta M Ghosh

HSBC, Ramani Chatterjee Rd., kolkata - 700029

A/c - 025301003006

My PAN no. AHPPM3919E



## Annexure – B

S.NO	NUMBER
1	9216365829
2	7972460291
3	7048308591
4	7028546237
5	8905514660
6	9685091961
7	6232155039
8	9989319668
9	8197857815
10	8421580972
11	7357149759
12	7249413328
13	7678081731
14	7400179083
15	9157416739
16	6232134717
17	9972304554
18	7721056487
19	9660585264
20	9052263357
21	9157516194
22	9500679022
23	9116789403
24	8769576526

Sh. Chinaswami  
Bijl  
29/10/24

To sci-c (NW)  
pls see and do needful



**By Speed Post AD**

**October 19, 2024**

Our ref:  
**31934/HC/1857-1**

IndusInd Bank Limited  
2401 Gen. Thimmayya Road (Cantonment),  
Pune-411001, Maharashtra  
Email: [nodal.officer@indusind.com](mailto:nodal.officer@indusind.com)

**Also At:**  
9th Floor, Block A,  
Hyatt Regency Complex,  
Bhikaji Cama Place, R K Puram  
New Delhi – 110066  
Email: [boibldelhi@indusind.com](mailto:boibldelhi@indusind.com)

...DEFENDANT NO.3

Yess Bank Limited  
Registered office at:  
Yess Bank House,  
Of Western Express Highway  
Sanacruz East,  
Mumbai 400055 (Maharashtra)  
Email: [head.grievanceredressal@yesbank.in](mailto:head.grievanceredressal@yesbank.in)  
[principal.nodalofficer@yesbank.in](mailto:principal.nodalofficer@yesbank.in)

....DEFENDANT NO.4

IDFC First Bank Limited  
Registered office:  
KRM Tower, 7th Floor,  
No.1, Harrington Road,  
Chetpet, Chennai600031,  
TamilNadu,  
Email: [pno@idfcfirstbank.com](mailto:pno@idfcfirstbank.com)

...DEFENDANT NO.5

Jana Small Finance Bank Limited  
The Fairway Business Park, First Floor,  
Survey No.10/1, 11/2 & 12/2B,  
Off Domlur, Koramangala Inner Ring Road,  
Next to EGL Business Park Challaghatta,  
Bengaluru – 560071  
Email: [Grievance.redressal@janabank.com](mailto:Grievance.redressal@janabank.com);  
[nodal.officer@janabank.com](mailto:nodal.officer@janabank.com)  
Tel: 080-46020100

...DEFENDANT NO.6

342/Sci'EC'Veo/2024  
23/10/2024

Office of GC Cyber Law  
Date: 22.10.2024  
Dy. No: 254

First Channel Building, Plot No. 17 A, Sector 16 A,  
Film City, Noida 201301 (UP) India

+91-120-4059300, +91-120-6779300

email@anandandanand.com

REGISTERED OFFICE B-41, Nizamuddin East, New Delhi 110 013

Indian Overseas Bank (IOB)  
762/763, IOB, Anna Salai,  
Chennai, Tamil Nadu-600002  
Email: [cybercell@iob.in](mailto:cybercell@iob.in)  
Number: 044-28584890

...DEFENDANT NO.7

Bank of Maharashtra  
Registered office at:  
Lokmangal, 1501, Shivajinagar,  
Pune-411005 Maharashtra  
Email: [hocomplaints@mahabank.co.in](mailto:hocomplaints@mahabank.co.in)

...DEFENDANT NO.8

State Bank of India  
Registered office at:  
Corporate Centre,  
Madame Cama Road,  
Mumbai – 400021, Maharashtra  
Email: [customercare@sbi.co.in](mailto:customercare@sbi.co.in)

...DEFENDANT NO.9

ESAF Small Finance Bank  
Registered address:  
Building No.VII/83/8,  
ESAF Bhavan,, Thrissur-Palakkad  
National Highway, Mannuthy,  
Thrissur/Trichur – 680651, Kerala  
Email: [principalnodalofficer@esafbank.com](mailto:principalnodalofficer@esafbank.com)

...DEFENDANT NO.10

Bandhan Bank  
Registered office:  
DN 32, Sector V, Salt Lake City,  
Kolkata West Bengal 700091  
Email: [customercare@bandhanbank.com](mailto:customercare@bandhanbank.com)

...DEFENDANT NO.11

Department of Telecommunications  
Sanchar Bhawan, 20 Ashoka Road,  
New Delhi-110001  
Email: [moc-office@gov.in](mailto:moc-office@gov.in)

...DEFENDANT NO.12

Ministry of Electronics and Information Technology  
Through its Nodal Officer Mr. Rakesh Maheshwari  
Electronics Niketan, 6, CGO Complex, Lodhi Road,  
New Delhi: 110003; Email: [rakesh@meity.gov.in](mailto:rakesh@meity.gov.in)

...DEFENDANT NO.13

WhatsApp LLC  
Unit B8 an B10, The Executive Center  
Level 18, DLF Cyber City, Building No.5,



Tower A, Phase III, Gurgaon – 122002

Email: [grievance\\_officer\\_wa@support.whatsapp.com](mailto:grievance_officer_wa@support.whatsapp.com)

...DEFENDANT NO.14

**Re: Billionbrains Garage Ventures Private Limited & Anr. Vs. Shivansh Singh Impersonating as Chief Strategy Analyst/ Principal Chief Strategy Analyst Groww Securities & Ors.; CS (COMM) No. 886 of 2024 before the High Court of Delhi**

Dear Sir,


We act on behalf of the Plaintiffs in the above matter.

As informed to you vide our email dated October 7, 2024, the Plaintiffs have filed the above suit against the Defendants for permanent injunction restraining infringement of trademark and copyright; passing off; dilution; tarnishment; unfair competition; trade practice; misappropriation; rendition of accounts; delivery up and damages; etc. You have been arrayed in the above suit as proforma Defendants to ensure compliance to orders passed by the Hon'ble Court.

Please note that the above suit was listed before Hon'ble Ms. Justice Mini Pushkarna of the Hon'ble High Court of Delhi on October 8, 2024.

Take notice that on the said date, the Hon'ble Judge was pleased to grant an *ex-parte ad-interim* injunction in favour of the Plaintiffs and against the Defendants. The Hon'ble Judge has till the next date of hearing, passed the following directions against you:

- I. The Defendant Nos. 1 and 2, their representatives, principal officers, proprietor/partners, servants, agents, their affiliates, subsidiaries, distributors, and all others acting for and on their behalf, are restrained from

using plaintiffs' registered trademarks GROWW and  and/or any other mark, which is identical or deceptively similar to the plaintiffs' registered trademarks, including, as part of domain name, WhatsApp groups, Telegram groups, mobile applications, Email Ids, etc. or in any manner in course of the trade, leading to infringement, passing off, unfair competition, tarnishment, dilution and infringement of copyright of the

plaintiffs' registered trademarks GROWW and .

- II. The defendant nos. 3 to 11 are directed to immediately freeze all the bank accounts of the defendant nos. 1 and 2, as mentioned in '**Annexure – A**' of the order dated 08.10.2024 (*the Annexure A of the order dated 08.10.2024 was modified by latest Order dated 16.10.2024 passed in I.A.*)

No.42394/2024) and provide documents to the plaintiffs relating to opening and operating of the said bank accounts, including KYC records of the account holder and complete account statement from opening till date, or any other such relevant document which is in power and possession, which would aid in disclosure of the identity and other details of the account holders.

III. The defendant no. 12 is directed to suspend and produce all details, call records, location history, and KYC particulars relating to the phone numbers mentioned in 'Annexure – B' of the present order, and any other such relevant document, which is in power and possession which would aid in disclosure of the identity and other details of the holder of the mobile numbers.

IV. The defendant No. 13 is directed to suspend the following websites [www.egroww.com](http://www.egroww.com), [www.egroww.com/h5](http://www.egroww.com/h5), [www.egroww.com/h5/#/login](http://www.egroww.com/h5/#/login), [www.quickgroww.com](http://www.quickgroww.com), [www.growwebs.com/h5](http://www.growwebs.com/h5), [www.igroww.com/h5](http://www.igroww.com/h5), [www.fastgroww.com/h5](http://www.fastgroww.com/h5), [www.igroww.com/h5/#/home](http://www.igroww.com/h5/#/home), <https://www.gazgipo.com/h5>.

V. The defendant nos. 16 and 17 are directed to produce all details and particulars relating to the Registrant of the aforesaid websites, including Registrant details, phone numbers, payment details, subscriber data, and any other such relevant document which is in power and possession which would aid in disclosure of the identity and other details of the Registrant.

VI. The defendant no. 15 is directed to take down/ suspend the links of the mobile applications, mentioned as follows:

S.NO	LINKS
1	<a href="https://groww-stocks-mutual-fund.en.softonic.com/android">https://groww-stocks-mutual-fund.en.softonic.com/android</a>
2	<a href="https://groww-stocks-mutual-fund.softonic.nl/android">https://groww-stocks-mutual-fund.softonic.nl/android</a>
3	<a href="https://groww-stocks-mutual-fund.softonic.com.tr/android">https://groww-stocks-mutual-fund.softonic.com.tr/android</a>
4	<a href="https://groww-stocks-mutual-fund.softonic.kr/android">https://groww-stocks-mutual-fund.softonic.kr/android</a>
5	<a href="https://groww-stocks-mutual-fund.softonic.ru/android">https://groww-stocks-mutual-fund.softonic.ru/android</a>
6	<a href="https://groww-stocks-mutual-fund.softonic-th.com/android">https://groww-stocks-mutual-fund.softonic-th.com/android</a>



7	<a href="https://groww-stocks-mutual-fund.softonic.com.br/android?ex=RAMP-2046.2">https://groww-stocks-mutual-fund.softonic.com.br/android?ex=RAMP-2046.2</a>
8	<a href="https://groww-stocks-mutual-fund.softonic.com/android">https://groww-stocks-mutual-fund.softonic.com/android</a>
9	<a href="https://groww-stocks-mutual-fund.softonic-id.com/android">https://groww-stocks-mutual-fund.softonic-id.com/android</a>
10	<a href="https://groww-stocks-mutual-fund.softonic.cn/android">https://groww-stocks-mutual-fund.softonic.cn/android</a>
11	<a href="https://groww-stocks-mutual-fund.de.softonic.com/android?ex=RAMP-2125.0">https://groww-stocks-mutual-fund.de.softonic.com/android?ex=RAMP-2125.0</a>
12	<a href="https://groww-stocks-mutual-fund.softonic.jp/android">https://groww-stocks-mutual-fund.softonic.jp/android</a>
13	<a href="https://groww-stocks-mutual-fund.fr.softonic.com/android?ex=RAMP-2125.1">https://groww-stocks-mutual-fund.fr.softonic.com/android?ex=RAMP-2125.1</a>
14	<a href="https://groww-stocks-mutual-fund.softonic.pl/android">https://groww-stocks-mutual-fund.softonic.pl/android</a>
15	<a href="https://groww-stocks-mutual-fund.softonic-ar.com/android">https://groww-stocks-mutual-fund.softonic-ar.com/android</a>
16	<a href="https://groww-stocks-mutual-fund.vi.softonic.com/android?ex=RAMP-2125.1">https://groww-stocks-mutual-fund.vi.softonic.com/android?ex=RAMP-2125.1</a>

VII. The defendant no.18 is directed to suspend from its platform groups/channels mentioned, as follows:

<https://t.me/GROWW8>

[https://t.me/GROWW\\_TIPS](https://t.me/GROWW_TIPS)

[https://t.me/Groww\\_tips0](https://t.me/Groww_tips0)

[https://t.me/groww\\_trenfing](https://t.me/groww_trenfing)

[https://t.me/GROWWMUTUALFUND\\_bot](https://t.me/GROWWMUTUALFUND_bot)

[https://t.me/GROWW\\_TIPS\\_TRADING\\_APP](https://t.me/GROWW_TIPS_TRADING_APP)

[https://t.me/Groww\\_Upstox\\_Intraday\\_Angelone](https://t.me/Groww_Upstox_Intraday_Angelone)

[https://t.me/Groww\\_Upstox\\_Angelone\\_stocks\\_one](https://t.me/Groww_Upstox_Angelone_stocks_one)

[https://t.me/upstox\\_angel\\_one\\_groww\\_zerodhaTelegram](https://t.me/upstox_angel_one_groww_zerodhaTelegram)

[https://t.me/GROWW\\_TIPS\\_TRADING\\_Angelone\\_tips](https://t.me/GROWW_TIPS_TRADING_Angelone_tips)

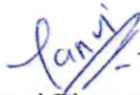
[https://t.me/GROWW\\_TRADING\\_BEAST\\_CALLS\\_TIPS\\_2](https://t.me/GROWW_TRADING_BEAST_CALLS_TIPS_2)

[https://t.me/Zerodha\\_Kite\\_Upstox\\_Groww\\_Tips\\_2](https://t.me/Zerodha_Kite_Upstox_Groww_Tips_2)

The matter is now listed before Learned Joint Registrar for marking of exhibits on **21<sup>st</sup> November, 2024** and before Court on **February 5, 2025**.

In compliance with the provisions of Order 39 Rule 3 Code of Civil Procedure, 1908, please find enclosed herewith the Order dated 08.10.2024 and 16.10.2024 as well as complete set of documents, additional documents, including the plaint, injunction application and other supporting papers filed in the matter.

Yours sincerely,



Tusha Malhotra / Tanvi Bhatnagar  
(D/1274/2008) / (D/2754/2018)

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Encl: As stated

**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.