813-7/25/2024-DS I/3268034/2025

#### By Email/DoT Website

Government of India
Ministry of Communications
Department of Telecommunications
Sanchar Bhawan, 20, Ashoka Road, New Delhi - 110 001
(Data Service Cell)

No. 813-07/LM/2024-DS-II Dated:12-04-2025

To,

**All Licensees with Internet Service Authorization** 

Subject: CS(COMM) No. 738 of 2024: WARNER BROS. ENTERTAINMENT INC. & ORS. Vs. MOVIESMOD.BET & ORS. before Hon'ble High Court of Delhi.

Kindly find enclosed the Hon'ble High Court of Delhi orders dated **09.04.2025** and **30.08.2024** on the subject matter.

- 2. Please refer to the para 29.2, 29.3 & 29.4 of the court order dated 30.08.2024 with regard to blocking of access to infringing websites [4 nos] in respect of **Defendants numbers 63 to 66** as per the court order dated 09.04.2025 and amended memo of parties. Details of the websites/domains/IP Addresses, as received from the plaintiff in this connection are enclosed herewith.
- 3. In view of the above, all Licensees with Internet Service Authorization are hereby instructed to take immediate necessary action for blocking of access to the said websites, as above, in compliance with the said court orders.

Encl: A/A

Digitally signed by SHASHI KUMAR

Date: 12-04-2025

17:46:14

Director (DS-II)

Email: dirds2-dot@nic.in

### Copy to:

- i.) Sh. V. Chinnasamy, Scientist E (chinnasamy.v@meity.gov.in), Electronics Niketan, Ministry of Electronics and Information Technology (MeitY) New Delhi for kind information and with request to take action as per the Annexure pl.
- ii.) Ms. Mehr Sidhu (mehr@saikrishnaassociates.com), Counsel for Plaintiffs for kind information and requested to take action as per the Annexure pl.
- iii) IT Wing of DoT for uploading this order on DoT websites pl.

## **List of Websites**

URL of New Mirror/Redirect/ Alphanumeric Variation of Injuncted Website	Domain Name of Mirror/Redirect/ Alphanumeric Variation of Injuncted Website	IP Addresses of New Mirror/Redirect/Alph anumeric Variation of Injuncted Website
https://9anime.co.ba	9anime.co.ba	104.21.41.149
1		172.67.148.6
https://katmoviehd.phd	katmoviehd.phd	172.67.166.133
https://katmoviend.pnd		104.21.58.252
https://katmoxiahd.hoo	katmoviehd.boo	172.67.217.93
https://katmoviehd.boo		104.21.24.72
	hydrahd.me	104.21.20.157
https://hydrahd.me	,	172.67.193.45





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

+ CS(COMM) 738/2024

WARNER BROS. ENTERTAINMENT INC. & ORS.

.....Plaintiff

Through: Ms. Priyanka Jaiswal,

Mr. Raghav Goyal, Ms. Mehr Sidhu, Mr. Pushpit Gosh,

Advocates

versus

#### MOVIESMOD.BET & ORS.

....Defendant

Through: Mr. Mukul Singh CGSC,

Ms. Ira Singh, Advocate for

D-55 & 56.

CORAM: JOINT REGISTRAR (JUDICIAL) Dr. AJAY GULATI

> ORDER 09.04.2025

**%** 

- I.A. No. 9374/2025 on behalf of plaintiffs seeking impleadment of additional mirrors, redirects, or alphanumeric variations as defendant nos. 63-66.
- 1. The plaintiffs are seeking to implead additional rogue-websites as defendants no. 63 to 66 because these have been found to be indulging in illegally disseminating the copyrighted material belonging to the plaintiffs. Keeping in view the contents of the suit and the application, the same is allowed. The proposed defendants are impleaded as defendants no. 63 to 66. Issue summons to the newly impleaded defendants.
- 2. The amended memo filed alongwith this IA is taken on record. Steps be taken to serve the newly impleaded defendant with summons within a week through the electronic mode only.
- 3. The order blocking the rogue-websites passed by the





Hon'ble Court on **30.08.2024** shall operate qua the freshly impleaded defendants as well, in terms of directions contained in para no. 29 of the order dated 30.08.2024. Accordingly, defendant ISP's shall give effect to the injunction by blocking defendant nos. 63 to 66. Further concerned defendants i.e. Department of Telecommunications and Ministry of Electronics and Information Technology shall issue blocking orders against defendant nos. 63 to 66 within a period of one week. IA is allowed and disposed off accordingly.

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

**APRIL 9, 2025**/sk

Click here to check corrigendum, if any





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

+ CS(COMM) 738/2024

WARNER BROS. ENTERTAINMENT INC. & ORS. .....Plaintiffs

Through: Mr. Saikrishna Rajagopal, Ms

Suhasini Raina, Ms. Anjali Agrawal, Ms. Mehr Sidhu, Ms.

Priyanka Jaiswal, Advocates.

Versus

MOVIESMOD.BET & ORS.

....Defendants

Through: None.

**CORAM:** 

HON'BLE MR. JUSTICE SAURABH BANERJEE

ORDER 30.08.2024

%

#### I.A. 37866/2024-Exp

- 1. Exemption allowed, subject to all just exceptions.
- 2. The applications stand disposed of.

## I.A. 37867/2024-Exp. from issuing notice to D-55 and D-56

- 3. This is an application seeking exemption from serving notice under Section 80 CPC to exempt the plaintiff from issuing notice to the defendant No.55, Department of Telecommunications (DoT) and defendant No.56, the Ministry of Electronics and Information Technology (MEITY) under Section 80 of the Code of Civil Procedure, 1908, as the relief being claimed against the said defendants is limited to ensure compliance of any orders of this Hon'ble Court in favour of the plaintiffs.
- 4. Exemption is granted.
- 5. The application stands disposed of.

CS(COMM) 738/2024

Page 1 of 18





## I.A. 37868/2024-Exp from filing documents in separate volumes

- 6. Exemption allowed, subject to all just exceptions.
- 7. The application stands disposed of.

### I.A. 37869/2024-Addl.doc.

- 8. The plaintiffs seek time of thirty days to file additional documents.
- 9. The plaintiffs will be at liberty to file additional documents within thirty days, *albeit*, strictly as per the provisions of the Commercial Courts Act, 2015 and Delhi High Court (Original Side) Rules, 2018.
- 10. Accordingly, the present application is disposed of.

#### **CS(COMM)** 738/2024

- 11. Let the plaint be registered as a suit.
- 12. Upon filing of the process fee, issue summons of the suit to the defendants through all permissible modes returnable before the Joint Registrar on 28.11.2024.
- 13. The summons shall state that the written statement(s) be filed by the defendants within a period of *thirty days* from the date of the receipt of the summons. Written statement(s) be filed by the defendants along with affidavit(s) of admission/ denial of documents of the plaintiffs, without which the written statement(s) shall not be taken on record.
- 14. Replication(s) thereto, if any, be filed by the plaintiffs within a period of *fifteen days* from the date of receipt of written statement(s). The said replication(s), if any, shall be accompanied by with affidavit(s) of admission/denial of documents filed by the defendants, without which the replication(s) shall not be taken on record within the aforesaid period of *fifteen days*.
- 15. If any of the parties wish to seek inspection of any document(s), the

CS(COMM) 738/2024

Page 2 of 18





same shall be sought and given within the requisite timelines.

16. List before the Joint Registrar for completion of pleadings on 28.11.2024. It is made clear that if any party unjustifiably denies any document(s), then it would be liable to be burdened with costs.

17. List before the Court on 13.01.2025.

## I.A. 37865/2024-Stay

- 18. The plaintiff seeks temporary injunction restraining the defendant Nos.1-45 from hosting, streaming, reproducing, distributing, making available to the public and/ or communicating to the public, or facilitating the same, on their websites, through the internet in any manner whatsoever, any cinematograph work/ content/ programme/ show to which the plaintiffs have a copyright and to block access to the defendant Nos.1-45 websites identified by the plaintiffs in the instant suit.
- 19. As per the pleadings of the plaintiff and after hearing arguments of the learned counsel, the following emerge:-
- 19.1. The plaintiffs namely, Warner Bros. Entertainment Inc., Columbia Pictures Industries, Inc., Disney Enterprises, Inc., Netflix US, LLC, SBS Co. Ltd., SLL Joongagng Co. Ltd. and CJ ENM Co. Ltd., are all owners of content. Plaintiffs claim to be leading global entertainment companies engaged in the business of creation, production, and distribution of motion pictures/ cinematograph films.
- 19.2. The works created by plaintiffs include sound recordings accompanied with visuals, and qualify as cinematograph film under Section 2(f) of the Copyright Act, 1957 ['the Act'] and, therefore, are entitled to protection by virtue of Section 13(1) read with Sections 13(2) and (5) of the Act.

CS(COMM) 738/2024





19.3. The content in question, in this suit is cinematograph films ['plaintiffs' works'], an illustrative list of which included in the plaint are extracted as under:-

Studio	Film	Year
Warner	Friends	1994-2004
Warner	Suicide Squad	2016
Warner	Mob Psycho	2016
Warner	The Conjuring 2	2016
Warner	Wonder Woman	2017
Warner	A Star Is Born	2018
Warner	Aquaman	2018
Warner	Batman	2022
Columbia	This is the End	2013
Columbia	Miracles from Heaven	2016
Columbia	Ghostbusters: Afterlife	2021
Columbia	Spider-Man: No Way Home	2021
Disney	Finding Dory	2016
Disney	The Jungle Book	2016
Disney	Mulan	2020
Disney	Encanto	2021
Netflix	Stranger Things – Season 1	2016
Netflix	Stranger Things – Season 2	2017
Netflix	Ibiza	2018
Netflix	Stranger Things – Season 3	2019
Netflix	Triple Frontier	2019
Netflix	Ghost Stories	2020
Netflix	Stranger Things- Season 4	2022
SBS	Running Man	2010
SBS	Romantic Doctor, Teacher Kim	2016
SBS	The Fiery Priest	2019
SBS	The Penthouse: War in Life	2020
SBS	Taxi Driver	2021
SBS	Business Proposal	2022
SBS	Revenant	2023
SLL	Sky Castle	2018
SLL	The World of the Married	2020
SLL	Reborn Rich	2022

CS(COMM) 738/2024 Page 4 of 18





SLL	Doctor Cha	2023
CJ ENM	Grandpas Over Flowers	2013
CJ ENM	Ode to My Father	2014
CJ ENM	Veteran	2015
CJ ENM	I Can See Your Voice	2015
CJ ENM	Guardian: The Lonely and Great	2016
	God	
CJ ENM	Crash Landing on You	2019
CJ ENM	Parasite	2019
CJ ENM	Vincenzo	2021

- 19.4. The plaintiffs, therefore, claim to have exclusive rights under Section 14(d) read with Section 17 of the Act.
- 19.5. Grievance of plaintiffs is against defendant nos.1-45 who are hosting and operating the respective domain names/websites ['infringing domains/ websites'] tabulated by plaintiffs are extracted as under:-

Defendant Nos.	Domain Name
01	moviesmod.bet; moviesmod.win; and moviesmod.band
02	vegamovies.nu; vegamovies.nz; vegamovies.tw; and vegamovies.to
03	fmoviesto.cc
04	animeflix.website
05	animixplay.st; animixplay.best; and animixplay.funanimixplayer.top
06	onlykdrama.sbs
07	watchsomuch.to; and watchsomuch.se
08	animerulz.pro; and animerulz.to
09	starflix.in
10	animeTMdubbers.net
11	kdramasmaza.com
12	24baze.com

CS(COMM) 738/2024 Page 5 of 18





13	animesuge.to
14	popcorntimeonline.xyz
15	dramanice.la
16	myasiantv.ac; myasiantv.ru; and myasiantv.tv
17	onetouchtv.co
18	starflixdrama.com
19	1flix.to
20	movieshd.watch
21	hdtodayz.to
22	winnoise.com
23	anix.vc; anixtv.to
24	1hd.to
25	9anime.com.pl
26	thenollyverse.com
27	draplay.info; draplay2.pro; and asianhd1.net
28	katmoviehd.fyi; katmoviehd.foo
29	6movies.stream
30	anicrush.to
31	animefox.in
32	binge.lol; binged.in; and binged.live
33	hydrahd.com
34	nites.is
35	vxanime.com
36	kissasiantv.cx
37	kshow123.tv
38	newasiantv.pro
39	asianc.sh
40	runasian.net

CS(COMM) 738/2024 Page 6 of 18





41	kissasian.lu
42	theflixertv.to
43	braflix.ru
44	gostream.to
45	1tamilblasters.mov; and 1tamilblasters.link

19.6. Further, these infringing domains/ websites are carrying and disseminating content, consisting of plaintiffs' copyrighted works, without any license or authorization. More than twenty of plaintiffs' works are being unauthorisedly made available by defendant nos.1-45. Further, legal notices were sent to these infringing domains/ websites operated by defendants to take down infringing content. However, none of them have responded to the said legal notices.

- 19.7. Further, defendant nos.46 to 54 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.
- 19.8. Defendant no.55 is DoT, while defendant no.56 is MeitY, which form part of the Government of India 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.
- 19.9. Defendant no.57 has been arrayed as "Ashok Kumar" which is a generic name to include all those who, in the future, may be discovered to be using the plaintiffs' content.
- 20. The present is a classic case exhibiting the evolution of "hydra-





headed" DNRs/ websites for streaming, reproducing, distributing, making available to the public and/ or communicating to the public any copyrighted content without appropriate licensing, where ownership of copyright is undisputed, the broad parameters to deal such issues were set out by this Court, in *UTV Software Communication Ltd. And Ors. vs.* 1337X.to and Ors., 2019:DHC:2047 which were "... ...required to be considered for determining, whether the website complained of is a FIOL/ Rogue Website... ..." as under:-

- i. "whether the primary purpose of the website is to commit or facilitate copyright infringement;
- ii. the flagrancy of the infringement, or the flagrancy of the facilitation of the infringement;
- iii. Whether the detail of the registrant is masked and no personal or traceable detail is available either of the Registrant or of the user.
- iv. Whether there is silence or inaction by such website after receipt of take down notices pertaining to copyright infringement.
- v. Whether the online location makes available or contains directories, indexes or categories of the means to infringe, or facilitate an infringement of, copyright;
- vi. Whether the owner or operator of the online location demonstrates a disregard for copyright generally;
- vii. 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;
- wiii. 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;
- ix. the volume of traffic at or frequency of access to the website; and
- x. Any other relevant matter."
- 21. Technology, certainly has its (ill)effects, which can be (mis)utilized if there is no proper channelisation. It may be a 'boon' for one, but if it is without any right, it can (soon) prove to be a 'bane' as well. The use of the contents of the plaintiffs by the defendants on multiple websites in the present case, without any of the said defendants having any right, title and/

CS(COMM) 738/2024





or interest, much less having obtained any authority, permission, sanction, clearance to do so from any of the plaintiffs, are certainly a 'bane' which calls for some remedial order(s).

- 22. The mushrooming of the defendants like the present types and that too by blatant and utter slavish activities with ulterior purpose(s), cannot be allowed to continue and calls upon for grant of an order of *ex parte ad interim* injunction against them by this Court, both not only qua the present but also qua the future, more so, since the plaintiffs do not know what beholds for them in future causing them to be helpless despite having an order of a Court of Law in their favour. The present is a situation where the defendants herein are like a sapling with very few branches and will soon grow into a big tree with many branches and deep roots. The defendants, as also anyone like them, need to be stopped as earliest as possible and they are required to abide by any such order passed by a Court of Law, both in the present as also in the future, which being binding upon them, has to be followed and adhered by them in letter and spirit.
- 23. As per the case set up by the plaintiff, the defendants are in flagrant infringement/ facilitation of infringement as is evident from the vast volume of content available on its websites, the systematic, organised and intentional nature of the infringement, and the regularity and consistency with which content is updated/uploaded on the websites. The defendants are also attempting to mask their websites' registration/ contact details which make it virtually impossible to locate the operators of most of the defendants' websites and extremely difficult to contact the operators of these websites to demand seizure of this infringing conduct.

CS(COMM) 738/2024





- 24. Further, the defendants' silence/ inaction to notices demonstrates the hydra-headed nature of these rogue websites, which even if blocked, multiply and resurface as alphanumeric or mirror websites. Moreover, the defendants' websites provide directories, indexes and categories for hyperlinks to copyrighted content located on a host/ server, where the end user can stream/ download the content. Thereby, defendants' websites provide a means of locating sources for content to be directly downloaded from a cloud storage site, hence, facilitating infringement.
- 25. Lastly, the defendants' general disregard for copyright is evident from the fact that the defendants websites tout that they provide content from third party websites which they are supposed to know, are not authorized to distribute copyright materials of the plaintiffs or other rights holders, also from the fact that latest content of the plaintiffs is regularly and consistently made available on majority of the defendants websites.
- 26. The plaintiff today is asking for a dynamic injunction, which recently has also been considered in Interim Application (Lodging) No.10257 of 2023 titled "Applause Entertainment Private Limited vs. Meta Platforms Inc. and others" wherein the Bombay High Court, while dealing with clips of the audio-visual content of the webseries, copyright whereof were held by the plaintiff therein, has granted an ex parte ad interim injunction of the same nature.
- 27. Similarly, this Court in *Universal City Studios LLC. and Ors. vs. Dotmovies.baby and Ors.* [2023:DHC:5842] has also recently, while considering similar issues, after noting the necessity and change, granted an *ex parte ad interim* injunction and held as under:-

"20. ... To keep pace with the dynamic nature of the infringement

CS(COMM) 738/2024

Page 10 of 18





that is undertaken by hydra-headed websites, this Court has deemed it appropriate to issue this 'Dynamic+ injunction' to protect copyrighted works as soon as they are created, to ensure that no irreparable loss is caused to the authors and owners of copyrighted works, as there is an imminent possibility of works being uploaded on rogue websites or their newer versions immediately upon the films/shows/series etc. The Plaintiffs are permitted to implead any mirror/redirect/alphanumeric variations of the websites identified in the suit as Defendants Nos. 1 to 16 including those websites which are associated with the Defendants Nos. 1 to 16, either based on the name, branding, identity or even source of content, by filing an application for impleadment under Order I Rule 10 CPC in the event such websites merely provide new means of accessing the same primary infringing websites that have been injuncted. ... ... "

- 28. For the afore-going reasons, especially as set out in paragraph nos.23 to 25 hereinabove as also the legal position qua grant of dynamic injunction in suits of the present nature, the plaintiffs have been able to make out a *prima facie* case with the *balance of convenience* for grant of an *ad interim ex-parte* injunction as also for dynamic injunction in their favour and against the defendants. In case the defendants are not restrained by way of an *ad interim ex-parte* injunction, there is a likelihood of the plaintiffs suffering *irreparable harm*, *loss*, *injury and prejudice* which cannot be compensated for in terms of money.
- 29. Accordingly, keeping in mind the existing position of law as also since this Court has taken note of the changing times coupled with the changing technology to keep pace, till the next date of hearing:
  - 29.1. Defendant nos.1 to 45 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 communicating to the public in any manner i.e. by hosting, storing, reproducing,

CS(COMM) 738/2024

Page 11 of 18





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 in **Annexure A**, attached to this order.

- 29.2. Defendant nos.46 to 54 (ISPs) are directed to block access to the infringing websites tabulated in **Annexure A** within 48 hours of receipt of this order.
- 29.3. Defendant nos.55 and 56 (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.
- 29.4. Lastly, 'Dynamic+ injunction' is granted to the plaintiffs to protect their copyrighted works as soon as they are infringed/ created, in order to ensure no irreparable loss is caused to the owners of copyrighted works. Consequently, the plaintiffs are permitted to implead any mirror/redirect/alphanumeric variations of the websites, as given in Annexure A, including those websites which are associated with them, either based on the name, branding, identity or even source of content, by making an appropriate application for impleadment.
- 30. Upon filing of process fee, issue notice to the defendants through all permissible modes including through email returnable before the Joint Registrar on 28.11.2024.
- 31. Reply be filed within eight weeks with advance copy to counsel for plaintiffs. Rejoinder thereto, if any, be filed on or before the next date of hearing.

CS(COMM) 738/2024





- 32. The provisions of Order XXXIX Rule 3 CPC be complied within one week.
- 33. List before the Court on 13.01.2025.

SAURABH BANERJEE, J

AUGUST 30, 2024/akr





## **Annexure A**

# List of defendants as per the plaint:

S. No.	Domain Name	URL	IP Address	
Defendant No. 1				
1.	moviesmod.bet	https://moviesmod.bet	172.67.188.82	
2.	moviesmod.win	https://moviesmod.win	172.67.201.249	
	mo viesmo en vim		104.21.42.62	
3.	moviesmod.band	https://moviesmod.band/	104.21.32.135 172.67.152.75	
Defenda	nt No. 2		172.07.132.73	
4.		1 //	172.67.171.168	
	vegamovies.nu	https://vegamovies.nu	104.21.55.159	
5.	vegamovies.nz	https://vegamovies.nz	104.21.45.226	
	vegumo vies.nz	ittps://vegamovies.nz	172.67.219.173	
6.	vegamovies.tw	http://vegamovies.tw	172.67.135.105	
			104.21.6.224	
7.	vegamovies.to	http://vegamovies.to	104.21.1.231	
Defenda	Defendant No. 3			
8.	fmoviesto.cc	https://fmoviesto.cc/	104.21.234.98	
0.			104.21.234.99	
Defenda	nt No. 4			
9.	animeflix.website	https://animeflix.website	104.199.204.141	
Defenda	nt No. 5		-	
10.			104.21.1.133	
10.	animixplay.st	https://animixplay.st	172.67.129.78	
11.		1 // 1 . 1	104.21.15.217	
	animixplay.best	https://animixplay.best	172.67.164.130	
12.	animixplay.fun	https://animixplay.fun	104.21.91.205	
	ammxpiay.iun		172.67.179.89	
13.	animira1a	https://animixplayer.top	104.21.70.227	
15.	animixplayer.top		172.67.140.41	
Defendant No. 6				
14.	onlykdrama.sbs	https://onlykdrama.sbs/	188.114.96.2	
	1			





			188.114.97.2	
			100.114.97.2	
Defenda	nt No. 7	T	T	
15.	watchsomuch.to	https://watchsomuch.to	104.21.55.24	
			172.67.144.34	
16.	watchsomuch.se	https://watchsomuch.se	104.21.88.143	
	watensomuch.se		172.67.182.96	
Defenda	nt No. 8			
17.	animerulz.pro	https://animerulz.pro	104.21.47.247	
	ammeruiz.pro	nttps.//ammeruiz.pro	172.67.174.214	
18.	animerulz.to	http://animerulz.to	104.21.19.156	
		*	172.67.186.205	
Defenda	nt No. 9	T	T	
19.	starflix.in	https://starflix.in	103.163.247.98	
Defenda	Defendant No. 10			
20.	animeTMdubbers.net	https://animeTMdubbers.net	142.251.16.121	
Defenda	nt No. 11			
21.	1. 1	https://kdramasmaza.com/	188.114.96.2	
	kdramasmaza.com		188.114.97.2	
Defenda	nt No. 12			
22.	24baze.com	https://download.24baze.co m	104.21.16.200	
Defenda	nt No. 13			
23.	animesuge.to	1.44m ox //omine o oxy oc. 4 o	172.64.108.25	
23.	C	https://animesuge.to	172.64.109.25	
Defenda	nt No. 14			
24.	popcorntimeonline.xy	https://popcorntimeonline.x	104.21.92.197	
<b>.</b>	Z	<u>yz</u>	172.67.197.93	
Defenda	nt No. 15	T		
25.	dramanice.la	https://dramanice.la/	104.21.67.145	
D-f 1			172.67.177.87	
Defendant No. 16				
26.	myasiantv.ac	https://myasiantv.ac/	104.26.4.93	
			172.67.73.22	
			1/2.07.73.22	





27.	myasiantv.ru	https://w1.myasiantv.ru/	188.114.96.2	
	myasianev.ra		188.114.97.2	
28.	myasiantv.tv	https://www13.myasiantv.tv	188.114.96.0	
D 0 1		<u>/</u>	188.114.97.0	
Defenda	nt No. 17		1	
29.	onetouchtv.co	https://onetouchtv.co	104.21.5.43	
			172.67.132.243	
Defenda	nt No. 18			
30.	starflixdrama.com	https://starflixdrama.com/	188.114.96.2	
		ittps://starrinxdrama.com/	188.114.97.2	
Defenda	nt No. 19		T	
31.	1flix.to	https://1flix.to/	104.21.5.50	
		<u>ittps:// iiiix.to/</u>	172.67.132.251	
Defenda	nt No. 20			
32.	movieshd.watch	https://movieshd.watch	104.21.42.172	
	moviesia.waten	nttps://moviesna.waten	172.67.206.207	
Defenda	nt No. 21			
33.	hdtodayz.to	https://hdtsdaym.to/	104.21.74.225	
33.	,	https://hdtodayz.to/	172.67.164.13	
Defenda	Defendant No. 22			
34.	winnoise.com		104.21.28.76	
34.		https://winnoise.com/	172.67.144.225	
Defenda	Defendant No. 23			
35.	anix.vc	https://anix.vc	104.21.32.84	
36.	anixtv.to	https://anixtv.to	104.21.27.168	
Defenda	nt No. 24			
37.	1hd.to	https://1hd.to/	104.21.65.16	
		https://Thu.to/	172.67.139.69	
Defendant No. 25				
38.	9anime.com.pl	https://9anime.com.pl	172.67.144.128	
Defendant No. 26				
39.	thenollyverse.com	https://www.thenollyverse.c	104.21.24.42	
Defendant No. 27				
188.114.96.2				
40.	draplay.info	https://dus.information.com/	100.114.70.2	
		https://draplay.info/	188.114.97.2	
41.	draplay2.pro	https://draplay2.pro/	188.114.96.2	
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	1		10011107
			188.114.97.2
42.	asianhd1.net	https://asianhd1.net/	104.21.9.118
		integration and integration	172.67.189.61
Defenda	nt No. 28		
43.	katmoviehd.fyi	https://katmoviehd.fyi	172.67.143.13
	Katinovichu.i yi	https://katmoviend.ryi	104.21.79.92
44.	katmoviehd.foo	https://katmoviehd.foo	172.67.131.48
		Ittps://kutinoviend.ioo	104.21.3.208
Defenda	nt No. 29		
45.	6movies.stream	https://6movies.stream	104.21.22.150
		1100 psw, 01110 +10010 0110	172.67.205.88
Defenda	nt No. 30	1	1,0,0,0,0
46.	anicrush.to	https://anicrush.to	104.21.71.65
D C 1	- N - 21		172.67.143.183
Detenda	nt No. 31		104 01 70 100
47.	animefox.in	https://animefox.in	104.21.73.123
		ittps://unimerox.in	172.67.190.6
Defenda	nt No. 32		
48.		https://binged.lol	104.21.33.224
40.	binge.lol	<u></u>	172.67.151.22
49.	binged.in	https://binged.in	104.21.40.228
	omged.m		172.67.157.144
		1 //1: 11:	104.21.20.12
50.	binged.live	https://binged.live	172.67.190.197
Defenda	nt No. 33	·	·
51.	hydrahd.com	https://hydrahd.com	104.21.64.103
Defenda	nt No. 34		•
52.	nites.is	https://w1.nites.is	79.124.78.248
Defenda	nt No. 35	1	
53.	vxanime.com		104.21.17.86
33.	VALITITIC.COM	https://vxanime.com	172.67.175.99
Defendant No. 36			
			104.26.14.2
54.	kissasiantv.cx	https://kissasiantv.cx	104.26.15.2
			172.67.75.226
Defendant No. 37			
55.	kshow123.tv	https://kshow123.tv/	188.114.96.2





			188.114.97.2	
Defenda	Defendant No. 38			
56.	. ,	https://www2.newasiantv.pr	188.114.96.2	
	newasiantv.pro	<u>o/</u>	188.114.97.2	
Defenda	nt No. 39		-	
			104.26.10.121	
57.	asianc.sh	https://asianc.sh/	104.26.11.121	
			172.67.69.240	
Defenda	nt No. 40			
			104.26.6.4	
58.	runasian.net	https://runasian.net/	104.26.7.4	
			172.67.74.124	
Defenda	nt No. 41			
59.	kissasian.lu	https://kissasian.lu	188.114.96.2	
			188.114.97.2	
Defendant No. 42				
60.	theflixertv.to	https://theflixertv.to/	104.21.76.15	
			172.67.185.15	
Defendant No. 43				
	braflix.ru	https://www.braflix.ru/	104.26.2.82	
61.			104.26.3.82	
			172.67.72.132	
Defenda	nt No. 44	1	I .	
62.	gostream.to	https://gostream.to/	104.31.16.8	
02.	8		104.31.16.121	
Defenda	Defendant No.45			
63.	1tamilblasters.mov	https://1tamilblasters.mov	104.21.68.88	
	rtaiiiioiasteis.iiiov	https://ituminolasteis.mov	172.67.192.127	
64.	1tamilblasters.link	https://1tamilblasters.link	104.21.19.85	
	TtaiiiiUiasteis.iiik	https://ttainifoldstefs.mik	172.67.185.175	

## IN THE HIGH COURT OF DELHI AT NEW DELHI

(Ordinary Original Commercial Jurisdic	etion)
I.A OF 2025	
IN	
CS(COMM) NO. 738 OF 2024	
IN THE MATTER OF	
Warner Bros Entertainment Inc. & Ors.	Plaintiffs
Versus	
moviesmod.bet & Ors.	Defendants
AMENDED MEMO OF PARTIES	<b>,</b>
IN THE MATTER OF:	
1. Warner Bros. Entertainment Inc.	
having its office at	
4000 Warner Boulevard, Burbank,	
California 91522, United States of America	
Email: antipiracy@warnerbros.com	
2. Columbia Pictures Industries, Inc.	
having its office at	
10202 W. Washington Blvd., Culver City,	
CA 90232-3195 United States of America,	
Email: piracy@spe.sony.com	
3. Disney Enterprises, Inc.	
having its office at	

500 S. Buena Vista, Burbank,

## CA, 91521, United States of America,

Email:tips@disneyantipiracy.com

#### 4. Netflix US, LLC

having its office at

5808 W. Sunset Blvd., Los Angeles

California 90028, United States of America

Email: legal@netflix.com

#### 5. SBS Co. Ltd.

having its office at

161, Mokdongseo-ro, Yangcheon-gu,

Seoul, Korea

Email: copyrighthub@sbs.co.kr

## 6. SLL Joongang Co. Ltd.

having its office at

38 Sangamsan-ro, Mapo-gu,

Seoul, Korea

Email:sll@sll.co.kr

## 7. CJ ENM Co. Ltd.

having its office at

870-13, Gwacheon-daero,

Seocho-gu

Seoul, Republic of Korea

Email: cjcopyright@cj.net

...Plaintiffs

#### Versus

1. moviesmod.bet moviesmod.win

moviesmod.band

Email ID: domainabuse@tucows.com; compliance@tucows.com

2. vegamovies.nu vegamovies.nz

vegamovies.tw

vegamovies.to

Email ID: moviescontact@protonmail.com

3. fmoviesto.cc

Email ID: abuse@cloudflare.com, abuse+law@cloudflare.com, noc@cloudflare.com

4. animeflix.website

Email ID: abuse@hostinger.com

5. animicplay.st

animicplay.best

animicplay.fun

animicplay.top

Email ID: whois@njal.nl, abuse@cloudflare.com, abuse+law@cloudflare.com, noc@cloudflare.com, abuse@namesilo.com, abuse@porkbun.com

## 6. onlykdrama.sbs

Email ID: abuse@namecheap.com

#### 7. watchsomuch.se

watchsomuch.to

Email ID: abuse@cloudflare.com,

abuse+law@cloudflare.com, noc@cloudflare.com

## 8. animerulz.pro

animerulz.to

Email ID: abuse@hostinger.com, abuse@cloudflare.com,

abuse+law@cloudflare.com,

noc@cloudflare.com

#### 9. starfilx.in

Email ID: abuse@hotsinger.com

#### 10. animeTMdubbers.net

Email ID: Abuse-complaints@squarespace.com

#### 11. kdramasmaza.com

Email ID: abuse@namecheap.com,

fd2f56d04585452b87d63a0b76b72676.

protect@withheldforprivacy.com

#### 12. 24blaze.com

Email ID: contact@24baze.com

## 13. animesuge.to

Email ID: abuse@cloudflare.com,

abuse+law@cloudflare.com, noc@cloudflare.com

14. popcorntimeonline.xyz

Email ID: domainabuse@tucows.com

15. dramanice.la

Email ID: abuse@namecheap.com, abuse@centrainic.com

16. w1.myasiantv.ru

myasiantv.ac

www13.myasiantv.tv

Email ID: abuse@namecheap.com,

abuse@cloudflare.com, abuse+law@cloudflare.com,

noc@cloudflare.com

17. onetouchtv.co

Email ID: abuse@namecheap.com

18. starflixdrama.com

Email ID: abuse@namcheap.com,

4bb9484fc7ab4355bf73c89acdd3deb4.

protect@withheldforprivacy.com

19. 1flix.to

Email ID: abuse@namecheap.com,

abuse@cloudflare.com, abuse+law@cloudflare.com,

20. movieshd.watch

Email ID: domainabuse@tucows.com

21.	hdtodayz.to
	Email ID: abuse@namecheap.com,
	abuse@cloudflare.com, abuse+law@cloudflare.com
22.	winnoise.com
	Email ID: abuse@namecheap.com &
	5cb8694453524574b78157ebcdc87ect.
	protect@withheldforprivacy.com
23.	anix.vc
23.	anixtv.to
	abuse@cloudflare.com, abuse+law@cloudflare.com,
24.	1hd.to
	Email ID:
	abuse@cloudflare.com, abuse+law@cloudflare.com,
	noc@cloudflare.com
25.	9anime.com.pl
	Email ID: support@openprovider.com
26.	thenollyverse.com
20.	·
	Email ID: thenollyverse.corn@contactprivacy.corn dornainabuse@tucows.com
	help@hover.com, info@nollyverse.com
27.	draplay.info
	draplay2.pro
	asianhd1.net
	Email ID: abuse@namecheap.com; 2b00406c25349

### 148b3b650ea35bbd28.protect@withhe ldforprivacy.com

28. katrnoviehd.fyi katrnoviehd.foo

Email ID: domainabusc@tucows.com

28. 1mov.to

Email ID: abuse@namecheap.com, abuse@cloudflare.com, abuse+law@cloudflare.com

29. 6movies.stream

Email ID: abuse@namecheap.com

30. anicrush.to

Email ID: abuse@namecheap.com, abuse@cloudflare.com, abuse#law@cloudflare.com,

31. animefox.in

Email ID: abuse@hostinger.com

32. binged.live

binged.in

binge.lol

Email ID: abuse@namecheap.com

33. hydrahd.com

Email ID: domainabuse@tucows.com

34. nites.is

Email ID: abuse@namecheap.com, abuse@cloudflare.com

#### 35. vxanime.com

Email ID: abuse@namecheap.com

#### 36. kissasiantv.cx

Email ID: registry@key-systems.net

#### 37. kshow123.tv

Email ID: registrar-abuse@cloudflare.com, abuse@cloudflare.com, abuse+law@cloudflare.com, noc@cloudflare.com

## 38. www2.newasiantv.pro

Email ID: abuse@namecheap.com, newasiantv.com@gmail.com

#### 39. asianc.sh

Email ID: abuse@namecheap.com

#### 40. runasian.net

Email ID: abuse@namecheap.com
3d05165123ea4ad69437bb436fd17885.protect@withheldf
orprivacy.com

#### 41. kissasian.lu

Email ID: renzuken08@gmail.com, support@epag.de

#### 42. theflixerty.to

Email ID: abuse@cloudflare.com, abuse+law@cloudflare.com, noc@cloudflare.com

#### 43. braflix.ru

Email ID: braflixtv@proton.me, abuse@cloudflare.com, abuse+law@cloudflare.com, noc@cloudflare.com

## 44. gostream.to

Email ID: abuse@cloudflare.com, abuse+law@cloudflare.com, noc@cloudflare.com

#### 45. **1**tamilblasters.mov

1tamilblasters.link

Email ID: domainabuse@tucows.com

#### 46. Atria Convergence Technologies Pvt. Ltd.

99A/113A, Manorayana Palya

R.T. Nagar Bangalore – 560032

#### Also at:

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48. Bharti Airtel Ltd.

Airtel Centre, Tower-A, 6<sup>th</sup> Floor
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compliance.officer@bhaiii.in, amit.bhatia@airtel.com,
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- 49. Hathway Cable & Datacom Pvt. Ltd.

  'Rahejas', 4 floor, Main Avenue

  Santacruz (W), Mumbai-400054

  ajay.singh@hathway.net, sudhir.shetye@hathway.net,

  digital.delnodal@hathway.net
- 50. Mahanagar Telephone Nigam Ltd.
  5th Floor, Mahanagar Doorsanchar Sadan 9, CGO
  Complex, Lodhi Road New Delhi 110003
  raco.mtnl@gmail.com, mtnlcsco@gmail.com,
  decceb@bol.net.in
- 52. Shyam Spectra Pvt. Ltd. Plot No. 258,

grievance.officer@jio.com

Okhla Industrial Estate, Phase III, New Delhi – 110020

Also at:

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Tata Teleservices Ltd.
 19<sup>th</sup> Floor, Berger Tower,
 Delhi One Complex, Sector 16(B)
 Noida UP-201301

Also at:

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akhildeepak.kamble@tatatel.co.in,
syed.mansoorzainvi@tatatel.co.in,

vrushali.dhamnaskar@tatatel.co.in

Vodafone India Limited
 Vodafone House,
 Peninsula Corporate Park,
 Ganpatrao Kadam Marg, Lower Parel,
 Mumbai - 400013

Also at:

Birla Centurion,

10th Floor, Plot No.794,

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Worli,

Mumbai - 400030

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oshi@vodafoneidea.cmo

55. Department of Telecommunications

Through Secretary,

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20, Sanchar Bhawan, Ashoka Road,

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secy-dot@nic.in, dirds2-dot@nic.in

56. Ministry of Electronics and Information Technology

Through the Director General (DIT) Cyber Laws & e-

security),

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Lodi Road, New Delhi – 110003

cyberlaw-legal@meity.gov.in

57. Ashok Kumars

58. animixplay.tube

Email ID: <u>abuse@namecheap.com</u>

59. animixplay.com.pl

Email ID: support@openprovider.com;

abuse@cloudflare.com, abuse+law@cloudflare.com

60. animixplay.name

Email ID: abuse@godaddy.com

61. 1hd.sh

Email ID: abuse@namecheap.com

62. 9anime.org.in

Email ID: abuse@porkbun.com

63. 9anime.co.ba

Email ID: abuse@cloudflare.com,

abuse+law@cloudflare.com, noc@cloudflare.com

64. katmoviehd.phd

Email ID: domainabuse@tucows.com

65. katmoviehd.boo

Email ID: domainabuse@tucows.com

66. hydrahd.me

Email ID: hydrahd@proton.me

## .....Defendants

Place: New Delhi Date: 7<sup>th</sup> April, 2025 Msidhu Pn/2695/2021

Mehr Sidhu (PH/2695/2021) Priyanka Jaiswal (D/4993/2024) Saikrishna & Associates Advocates for the Plaintiffs 57, Jor Bagh, Delhi – 110003 +91 8879106222

mehr@saikrishnaassociates.com

#### **Annexure**

Subject: Action requested to be taken by MEITY and Plantiff for effective removal of content for viewing by public at large within India as per the said orders of Hon'ble Court.

It is observed that a number of orders of Hon'ble Court are issued for blocking of websites every month. There are around more than 2700 ISPs in India and these ISPs are connected among themselves in a mesh network. DOT is instructing each of the ISPs through emails/through its website for blocking of the websites as ordered by the Hon'ble Courts. Ensuring compliance of the orders by each of the ISPs is a time-consuming and complex task especially in view of multiplicity of orders of Hon'ble Courts, multiplicity of websites to be blocked and multiplicity of ISPs.

2. Allocation of Business Rules inter-alia sates thus:-

'Policy matters relating to information technology; Electronics; and Internet (all matters other than licensing of Internet Service Provider)'.

- 3. In view of above and in order to ensure effective removal by content for viewing by public at large, the plantiff is requested to do a trace route of the web server hosting the said website. In case the web server happens to be in India, the plantiff may inform the same to Meity who may direct the owner of such web server to stop transmission of content as per IT Act and as directed by the Hon'ble Court so that the content would be blocked from the source itself and the exercise of blocking by 2700 ISPs would not be required.
- 4. In case such server is located abroad i.e. outside India then access to such URL/website can be blocked through the international internet gateways which are much less in number. This would result in timely and effectively removal of undesirable content for viewing by public at large as is the requirement as per the orders of Hon'ble Court.