813-7/25/2024-DS I/3267303/2025

#### 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-39/2024-DS-II

Dated:09-04-2025

To,

**All Licensees with Internet Service Authorization** 

Subject: CS (COMM) 837 of 2024: Star India Pvt. Ltd versus MovieBlast application And Ors. before the High Court of Delhi.

Kindly find enclosed the Hon'ble Delhi High Court order dated **04.04.2025** on the subject matter.

- 2. Please refer to **Para 09** of the said Court order in respect of blocking of websites [3 nos] enumerated in the  $3^{rd}$  additional lists of websites, received from the plaintiff.
- 3. In view of the above, all the Licensees with Internet Service Authorization are hereby instructed to take immediate necessary action for blocking of the said websites, as above, for compliance of the said court order.

Encl: A/A

Digitally signed by SHASHI KUMAR Date: 09-04-2025 16:11:16

**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 Annexure pl.
- ii. Sh. Vivek Kumar (v.kumar@saikrishnaassociates.com), Plaintiff's Counsel 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.

Websites (3rd additional list)	App Name
https://cfyhdgjjvddjbv33.top/	CricFY TV
https://news-north-port.cytopreports.store/	Sportzx TV
https://cdn531-content-distribution-prd-eu-67f41506a9aea.skycdn.me/	HD Streamz





\$~32

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

I.A. 8790/2025

IN

+ CS(COMM) 837/2024

STAR INDIA PVT. LTD.

.....Plaintiff

Through: Mr. Sidharth Chopra, Mr. Yatinder

Garg, Ms. Snehima Jauhari and

Mr. Vivek Kumar, Advocates

versus

MOVIEBLAST APPLICATION AND ORS Through:

....Defendants

**CORAM:** 

HON'BLE MR. JUSTICE AMIT BANSAL

ORDER 04.04.2025

%

#### I.A. 8790/2025 (u/O XXXIX Rule 1 and 2, CPC)

- 1. This application has been filed on behalf of the plaintiff seeking additional directions in furtherance of the directions passed by this Court *vide* the order dated 26<sup>th</sup> September, 2024, wherein an *ex-parte ad interim* injunction was granted in favour of the plaintiff directing blocking of Apps/UIs/websites which were communicating the plaintiffs original content to the public.
- 2. The plaintiff seeks a direction in respect of blocking of infringing websites that provide .APK files for downloading various Rogue Apps and provide access and/or links where the illegal/infringing copies of the copyrighted content of the plaintiff is stored and/or hosted, on a real-time

CS(COMM) 837/2024 Page 1 of 3





basis.

- 3. Mr. Sidharth Chopra, counsel appearing for the plaintiff submits that pursuant to the directions passed on 26<sup>th</sup> September, 2024, the plaintiff has till date filed 42 affidavits, bringing on record 14 new rogue applications and 42 infringing websites that provide links for downloading the rogue applications/User Interfaces (UIs).
- 4. It is submitted that on account of an increasing piracy activities of such rogue applications especially during the Indian Premier League (IPL) Cricket Tournament, 2025, any delay in blocking of these rogue websites/UIs causes prejudice to the plaintiff.
- 5. Accordingly, it is submitted that on account of the IPL-2025 season, which is currently going on, the plaintiff seeks a relief that the blocking action against the rogue application can take place on a real-time basis.
- 6. Mr. Chopra further submits that similar directions have been passed by this Bench *vide* order dated 18<sup>th</sup> December, 2024 in CS(COMM) 1149/2024.
- 7. A *prima facie* case is made on behalf of the plaintiff.
- 8. The rampant piracy carried out by rogue websites during the ongoing IPL season discloses that there is an urgency to pass an order in favour of the plaintiff for real-time blocking of these websites.
- 9. Accordingly, it is directed that during the currency of the aforesaid event, if any further websites are discovered, which are illegally streaming and communicating content over which the plaintiff has copyright, the plaintiff is granted liberty to communicate the details of such websites to the defendants no.18 and 19 (DoT and MeitY) for issuance of blocking orders, and simultaneously to the ISPs/DNRs for blocking the said websites, so as to

CS(COMM) 837/2024 Page 2 of 3

This is a digitally signed order.





ensure that these websites can be blocked on a real-time basis and there is no undue delay. Upon receiving the said intimation from the plaintiffs, the ISPs/DNRs shall take steps to immediately block the rogue websites in question. Likewise, the DoT and MeitY, upon the plaintiffs communicating the details of the websites, shall also immediately issue necessary blocking orders of the rogue websites which are illegally streaming the Event.

- 10. After communicating details of the rogue websites to the concerned authorities, the plaintiff shall file affidavits with the Court in order to ensure that the Court is fully informed of the websites in respect of which blocking orders are sought.
- 11. If any website, which is not primarily an infringing website, is blocked pursuant to the present order, they shall be permitted to approach the Court by giving an undertaking that it does not intend to engage in any unauthorized or illegal dissemination of the event or any other content over which the plaintiff has copyright. In such a situation the Court would consider modifying the injunction as the facts and circumstances, so warrant.
- 12. The plaintiff is permitted to ensure compliance of Order XXXIX Rule 3 of Code of Civil Procedure, 1908 within a period of one week.

AMIT BANSAL, J

APRIL 4, 2025 ds

CS(COMM) 837/2024 Page 3 of 3

This is a digitally signed order.

CODE: 50000.01

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

IN THE MATTER OF: Star India Pvt. Ltd.		Plaintiff
	versus	
MovieBlast Application and	d Ors.	Defendants

To,

1. MovieBlast Application

Related domains:

movieblast.rocks; mb.movieblast.rocks;

Email: support@movieblast.live; abuse@name.com;

abuse@spectraip.nl

2. Movies Hub Application

Related domains:

movieshubapk.com; movapp.techmirrorhublinks.site;

Email: abuse@spaceship.com; abuse@spectraip.nl;

abuse@hostinger.com

3. Nova TV Application

Related domains:

novatv.app; https://teatv.xyz

Email: novatvapk@gmail.com; abuse@namecheap.com;

abuse@godaddy.com;

# 4. Name.com, Inc.

PO Box 1769, Denver, Colorado, 80201, United States

Phone: +1.7208009072

Email: abuse@name.com

# 5. Spaceship, Inc.

4600 East Washington Street,

Suite 300, Phoenix, AZ 85034, USA

Email: support@spaceship.com; abuse@spaceship.com;

# 6. Hostinger Operations, UAB

Jonavos str. 60C, 44192

Kaunas, Lithuania

Email: abuse@hostinger.com

# 7. Name Cheap Inc.

Module 403, Tidel Park

Coimbatore Ltd Elcosez Aerodrom

Coimbatore, TN - 641014

Email: legalandabuse@namecheap.com; support@namecheap.com, grievance.officer@namecheap.com; abuse@namecheap.com

# 8. Go Daddy LLC,

GoDaddy East, LLC

Abuse Department

2155 East GoDaddy Way.

Tempe, AZ 85284 USA

Email: RyPrimaryContact@godaddy.com; abuse@godaddy.com

# 9. Atria Convergence Technologies Private Limited

99A/113A, Manorayana Palya

R.T. Nagar Bangalore – 560032

Also, at:

2<sup>nd</sup> and 3<sup>rd</sup> Floor, No. 1,

Indian Express Building, Queen's Road,

Bangalore – 560001, Karnataka

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

jitesh.chathambil@actcorp.in

# 10. Bharat Sanchar Nigam Ltd

Bharat Sanchar Bhawan, Regulation Cell

5th floor, Harish Chandra Mathur Lane

Janpath, New Delhi -110001

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

sushmamishra71@gmail.com

#### 11. Bharti Airtel Ltd.

Airtel Center Plot No. 16,

Udyog Vihar, Phase-IV, Gurugram – 122015, India

E-mail: amit.bhatia@airtel.com

# 12. Hathway Cable & Datacom Pvt. Ltd.

'Rahejas', 4 floor, Main Avenue

Santacruz (W), Mumbai-40054

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

sudhir.shetye@hathway.net

### 13. Mahanagar Telephone Nigam Ltd.

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

9, CGO Complex, Lodhi Road

New Delhi – 110003

E-mail: raco.mtnl@gmail.com, mtnlcsco@gmail.com, gmracomtnl@gmail.com

#### 14. Reliance Jio Infocomm Limited

Corporate Office:5th Floor, Maker Chambers IV,

222, Nariman Point, Mumbai – 400 021

Maharashtra, India

Tel: +91-22-44770000

E-mail: jio.investorrelations@ril.com

care@jio.com, Hitesh.marthak@relianceada.com,

Kapoor.guliani@ril.com, mahipal.singh@ril.com,

sunil.kr.gupta@ril.com, shilpi.kant@ril.com,

jyoti.jain@ril.com, rudraksha.sinha@ril.com,

neelakantan.an@ril.com

#### 15. Shyam Spectra Pvt. Ltd.

Plot No. 258,

Okhla Industrial Estate, Phase III,

New Delhi – 110020

Also, at:

Plot No. 21-22, 3rd Floor,

Udyog Vihar, Phase IV,

Gurugram -122015

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

# 16. Tata Teleservices Ltd.

A, E & F Blocks Voltas Premises - T. B. Kadam Marg

Chinchpokli, Mumbai – 400033

E-mail: pravin.jogani@tatatel.co.in, anand.dalal@tatatel.co.in,

satya.yadav@tatatel.co.in

#### 17. Vodafone Idea Limited

Vodafone House,

Peninsula Corporate Park,

Ganpatrao Kadam Marg,

Lower Parel, Mumbai - 400 013 India

Also, at:

Birla Centurion,

10th Floor, Plot no.794,

B Wing, Pandurang Budhkar Marg,

Worli, Mumbai - 400 030 India

E-mail: smitha.menon@vodafoneidea.com,

pankaj.kapdeo@vodafoneidea.com,

Radhika.gokhale@vodafoneidea.com,

sheena.thukral@vodafoneidea.com,

lavati.sairam@vodafoneidea.com

Florencia.deproses@vodafoneidea.com

Sanjeet.sarkar@vodafoneidea.com

Arun.madhav@vodafoneidea.com

#### 18. Department of Telecommunications

Through Secretary,

Ministry of Communications and IT,

20, Sanchar Bhawan, Ashoka Road,

New Delhi – 110001

E-mail: secy-dot@nic.in, dirds2-dot@nic.in

19. Ministry of Electronics and Information Technology

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

Electronics Niketan, 6, CGO Complex,

Lodi Road, New Delhi – 110003

E-mail: cyberlaw-legal@meity.gov.in; gccyberlaw@meity.gov.in;

pkumar@meity.gov.in, sathya.s@meity.gov.in

20. Ashok Kumar(s)

...Defendants

Dear Sir/Ma'am,

The enclosed suit is being filed on behalf of the Plaintiff and is likely to be listed on 26<sup>th</sup> September 2024 or any day thereafter. Please take notice accordingly.

Yours truly,

Yatinder Garg | Snehima Jauhari | Vivek Kumar (D/1330/2015) | (D/2733/2017) | (D/7260/2023)

Saikrishna & Associates Counsels for the Plaintiff 57, Jor Bagh, New Delhi- 110003

+919667960678

v.kumar@saikrishnaassociates.com

Place: New Delhi

Date: 21<sup>ST</sup> September 2024

Fwd: URGENT | DOT | List 3 | Real-time blocking of IPL domains / URLs | Compliance of Order dated 26.09.2024 & 04.04.2025 passed in Star India Pvt. Ltd. & Anr. v. MovieBlast Application & Ors. [CS. (COMM.) 837 of 2024] before the Hon'ble Delhi High Court

Amar Nath <amar.nath88@nic.in>
Wed, 09 Apr 2025 11:05:11 AM +0530 •

- To "Kishore Bhagtani" <ddgds-dot@nic.in>, "Shashi Kumar" <dirds2-dot@nic.in>, "Abhinesh Meena" <jto2ds2-dot@gov.in>
- Cc "Rajiv Ranjan Tiwari" <ddglaw-dot@gov.in>, "dirlaw2-dot" <dirlaw2-dot@gov.in>, "VINAY ." <vinay.2009@gov.in>

Sir,

Please refer to the trail mail on the above subject.

The matter pertains to the blocking of websites/URLs regarding the infringement of copyright/ trademark/ patent/ exclusive rights of the plaintiff. The case is being forwarded for taking necessary action in the matter.

Regards,

Amar Nath
Section Officer(Legal)
Law Division, DoT



======= Forwarded message ========

From: Saurabh Kumar < dirlaw-dot@gov.in > To: "Amar Nath" < amar.nath88@nic.in > Date: Wed, 09 Apr 2025 10:11:05 +0530

Subject: Fwd: URGENT | DOT | List 3 | Real-time blocking of IPL domains / URLs | Compliance of Order dated 26.09.2024 & 04.04.2025 passed in Star India Pvt. Ltd. & Anr. v. MovieBlast Application

& Ors. [CS. (COMM.) 837 of 2024] before the Hon'ble Delhi High Court

======= Forwarded message ========

With Regards,

Saurabh Kumar, Director (Law-II) Department of Telecommunication Mahanagar Doorsanchar Bhawan, J L N Marg, New Delhi-110002

======== Forwarded message =========

From: Rajiv Ranjan Tiwari < <a href="mailto:ddglaw-dot@gov.in">ddglaw-dot@gov.in</a> To: "Saurabh Kumar"< <a href="mailto:dirlaw-dot@gov.in">dirlaw-dot@gov.in</a> Date: Wed, 09 Apr 2025 09:49:21 +0530

Subject: Fwd: URGENT | DOT | List 3 | Real-time blocking of IPL domains / URLs | Compliance of Order dated 26.09.2024 & 04.04.2025 passed in Star India Pvt. Ltd. & Anr. v. MovieBlast Application

& Ors. [CS. (COMM.) 837 of 2024] before the Hon'ble Delhi High Court

======= Forwarded message ========

With Regards,

R R Tiwari
Dy. Director General (Law)
Department of Telecommunication
Room No. 712,
Mahanagar Doorsanchar Bhawan,
J L N Marg, New Delhi-110002
Ph. +91-11-23210209



======== Forwarded message =========

From: Dr. Neeraj Mittal < <a href="mailto:secy-dot@nic.in">secy-dot@nic.in</a> To: "DDG LAW DoT HQ" < <a href="mailto:ddglaw-dot@gov.in">ddglaw-dot@gov.in</a> Date: Wed, 09 Apr 2025 09:44:22 +0530

Subject: Fwd: URGENT | DOT | List 3 | Real-time blocking of IPL domains / URLs | Compliance of Order dated 26.09.2024 & 04.04.2025 passed in Star India Pvt. Ltd. & Anr. v. MovieBlast Application

& Ors. [CS. (COMM.) 837 of 2024] before the Hon'ble Delhi High Court

======= Forwarded message =======

Dr. Neeraj Mittal Secretary Department of Telecommunications, Ministry of Communications Sanchar Bhavan, 20 Ashoka Road, New Delhi - 110001 Phone: +91-11-23719898,

Email: secy-dot@nic.in, Web: https://dot.gov.in



From: "v kumar" <v.kumar@saikrishnaassociates.com>

**To:** "Dr. Neeraj Mittal" <<u>secy-dot@nic.in</u>>, "Shashi Kumar" <<u>dirds2-dot@nic.in</u>>, "Cyber Law Legal" <<u>cyberlaw-legal@meity.gov.in</u>>, "Group Coordinator,CLDG Division, Meity" <<u>gccyberlaw@meity.gov.in</u>>, "Prafulla Kumar" <<u>pkumar@meity.gov.in</u>>, "Dr S Sathyanarayanan" <<u>sathya.s@meity.gov.in</u>>

Cc: "ashok yadav1" <<u>ashok.yadav1@jiostar.com</u>>, "ankush mahajan" <<u>ankush.mahajan@jiostar.com</u>>, <u>snehima@saikrishnaassociates.com</u>, <u>yatinder@saikrishnaassociates.com</u>, "ram panchal" <ram.panchal@jiostar.com>, rimjhim@saikrishnaassociates.com

Sent: Tuesday, April 8, 2025 9:50:25 PM

**Subject:** Re: URGENT | DOT | List 3 | Real-time blocking of IPL domains / URLs | Compliance of Order dated 26.09.2024 & 04.04.2025 passed in Star India Pvt. Ltd. & Anr. v. MovieBlast Application & Ors. [CS. (COMM.) 837 of 2024] before the Hon'ble Delhi High Court

#### Real-time blocking of IPL Domains (List 3) - 3 UI domains.

Dear Sir,

We write to you on behalf of our Client, Star India Private. Ltd ("Our Client").

As you are aware the captioned suit was filed by Our Client against the rogue applications indulged in copyright infringement of Our Client's exclusive rights. In the present suit, Our Client has also impleaded various Domain Name Registrars (Defendant No. 4-8), Internet Service providers (Defendant No. 9-17) as well as the concerned government departments (Department of Telecommunication and the Ministry of Electronics and Information Technology) (Defendant No. 18 and 19), as Defendants, to ensure effective compliance of any orders that the Hon'ble Delhi High Court was inclined to pass.

The Hon'ble Justice Mr. Amit Bansal, Delhi High Court on 26<sup>th</sup> September 2024 was pleased to pass an *ex-parte ad-interim* order. The relevant para of the Order dated 26.09.2024 is extracted herein below:

- "38. In view of the averments noted hereinabove and in view of the judgment passed in **UTV Software Communication Ltd.** (supra), this Court is of the opinion that a prima facie case is made out in favour of the plaintiff. Balance of convenience is also in favour of the plaintiff. Further, irreparable harm or injury would be caused to the plaintiff if an interim injunction order is not passed.
- 39. Accordingly, defendants No. 1 to 3 (and any such other Uls/websites which appears to be associated with any of the defendant apps and websites based on its name, branding or the identity of its operator, or discovered to provide additional means of accessing, the defendant apps and websites, and other domains/domain/apps/Uls along with their sub domains and subdirectories, owners/website operators/entities which are discovered to have been engaging in infringing the plaintiff's exclusive rights), their owners, partners, proprietors, officers, servants, employees, and all others in capacity of principals or agents, acting for and on their behalf, or anyone claiming through, by or under them are <a href="hereby restrained">hereby restrained</a>, from, in any manner hosting, streaming, reproducing, distributing, making available to the public and/or communicating to the public, or facilitating the same, on their Apps/Uls/websites, through the internet in any manner whatsoever, any cinematograph work/content/programme/show in relation to which plaintiff has a copyright.
- 40. The defendants No. 4 to 8 shall ensure compliance with this order by blocking defendants no. 1 to 3 websites, their URLs and the respective UIs as filed along with the suit (Pg 1 Vol 1) (also annexed herewith as annexure A) and any other UIs/apps/websites notified by the plaintiff by filing of an affidavit.
- 41. The defendants no. 4 to 8, their directors, partners, proprietors, officers, affiliates, servants, employees, and all others in capacity of principal or agent acting for and, on their behalf, or anyone claiming through, by or under it, are directed to disclose the following information of the defendants no. 1 -3 (and any such other websites/UIs which are discovered during the course of the proceedings and notified on Affidavit by the plaintiff to have been infringing/ authorizing the infringement of the plaintiff's exclusive rights, copyrights and broadcast reproduction rights):
- A. Complete details (such as name, address, email address, phone number, IP address etc.) of the defendants no. 1 3 (and any such other websites/UIs which are discovered during the course of the proceedings and notified on Affidavit by the plaintiff to have been infringing/ authorizing the infringement of

the plaintiff's exclusive rights, copyrights).

- B. Mode of payment along with payment details used for registration of domain name by the registrant i.e., defendant no. 1-3 (and any such other websites/UIs which are discovered during the course of the proceedings and notified on Affidavit by the plaintiff to have been infringing/ authorizing the infringement of the plaintiff's exclusive rights, copyrights).
- 42. The defendants No. 9 to 17 shall ensure compliance with this order by blocking defendants no. 1 to 3 websites, their URLs and the respective UIs as filed along with the suit (Pg 1 Vol 1) (also annexed herewith as annexure A) and any other apps/websites notified by the plaintiff by filing of an affidavit.
- 43. Defendants no. 18 and 19 are further directed to take immediate steps and issue requisite notifications within five working days, calling upon various internet and telecom service providers registered under them to block the aforementioned websites/UIs identified by the plaintiff."

Copy of the order dated 26.09.2024 is attached herewith.

Further, in order to tackle increasing piracy activities of rogue mobile applications especially during the ongoing Indian Premier League (IPL) Cricket Tournament, 2025, the Plaintiff had filed an application bearing I.A. 8790/2025 under Order 39 Rule 1 and 2. In the said application directions for real-time blocking of the UIs by the ISPs, DNRs and DOT/MEITY were sought by Our Client. The Hon'ble Delhi High Court was pleased to allow above application and pass following directions -

- "7. A prima facie case is made on behalf of the plaintiff.
- 8. The rampant piracy carried out by rogue websites during the ongoing IPL season discloses that there is an urgency to pass an order in favour of the plaintiff for real-time blocking of these websites.
- 9. Accordingly, it is directed that during the currency of the aforesaid event, if any further websites are discovered, which are illegally streaming and communicating content over which the plaintiff has copyright, the plaintiff is granted liberty to communicate the details of such websites to the defendants no.18 and 19 (DoT and MeitY) for issuance of blocking orders, and simultaneously to the ISPs/DNRs for blocking the said websites, so as to ensure that these websites can be blocked on a real-time basis and there is no undue delay. Upon receiving the said intimation from the plaintiffs, the ISPs/DNRs shall take steps to immediately block the rogue websites in question. Likewise, the DoT and MeitY, upon the plaintiffs communicating the details of the websites, shall also immediately issue necessary blocking orders of the rogue websites which are illegally streaming the Event.
- 10. After communicating details of the rogue websites to the concerned authorities, the plaintiff shall file affidavits with the Court in order to ensure that the Court is fully informed of the websites in respect of which blocking orders are sought.
- 11. If any website, which is not primarily an infringing website, is blocked pursuant to the present order, they shall be permitted to approach the Court by giving an undertaking that it does not intend to engage in any unauthorized or illegal dissemination of the event or any other content over which the plaintiff has copyright. In such a situation the Court would consider modifying the injunction as the facts and circumstances, so warrant."

Copy of the order dated 04.04.2025 is attached herewith.

Pursuant to the above directions, Our Client has found 3 additional UIs used by the rogue mobile applications to illegally communicate and stream ongoing IPL. Evidence against these 3 UIs can be download from the link below: <a href="https://drive.google.com/drive/folders/1tQsCCwoBDGf4DQYtEUYNF4i4wwOekGAG?usp=sharing">https://drive.google.com/drive/folders/1tQsCCwoBDGf4DQYtEUYNF4i4wwOekGAG?usp=sharing</a>

List of these 3 additional UIs is also attached herewith.

Consequently, in terms of the directions passed by the Hon'ble Court, *vide* order dated 26<sup>th</sup> September 2024 (reproduced above i.e. paragraph 38 read with paragraph 39)) and 4<sup>th</sup> April 2025 (reproduced above i.e. paragraph 7 to 11) the *ex parte ad-interim* order is also applicable with respect to these 3 additional UIs.

In lieu of the above facts and circumstances, we respectfully urge you to immediately block access to the additional 3 domains / URLs, as set forth in the Order of the Hon'ble High Court of Delhi dated 26<sup>th</sup> September 2024 (*vide* paragraph 42) and 4<sup>th</sup> April 2025 (*vide* paragraph 9)

If you have any queries, please feel free to contact us.

Sincerely, Vivek Kumar

Vivek Kumar | Associate | Saikrishna & Associates, 57 Jor Bagh, Delhi - 110003, India| Tel:+91-11-40244360 (100 Lines) |

[Enrolment No.: D/7260/2023, Patent Agent: IN/PA-5974]

- WTR 1000 Gold Ranked Firm- Enforcement & Litigation 2015, 2016, 2017 & 2018
- CHAMBERS ASIA PACIFIC 2015, 2016 & 2017 Leading Firm- IP & TM
- INDIAN BUSINESS LAW JOURNAL Law Firm Awards- Winner- Intellectual Property India- 2015
- INDIAN BUSINESS LAW JOURNAL Law Firm Awards- Winner- Technology Media & Telecommunication-India 2015
- INDIAN NATIONAL BAR ASSOCIATION IP Practice-Law Firm of the Year 2015
- MANAGING IP- Global Awards 2014- Firm of the Year- India- Contentious

The Information contained in this e-mail and/or in any of the attached files is confidential and proprietary information of Saikrishna & Associates and also the subject of legal professional privilege. This privilege is not waived or lost by mistaken transmission or receipt. If you are not the intended recipient, any use, disclosure or copying of this mail is unauthorised. If you have received this mail in error, please notify us at <a href="mailto:info@saikrishnaassociates.com">info@saikrishnaassociates.com</a> immediately by reply email and destroy the original.

On Mon, Apr 7, 2025 at 9:58 PM Vivek Kumar < <u>v.kumar@saikrishnaassociates.com</u>> wrote: Real-time blocking of IPL Domains (List 2) - 4 UI domains.

Dear Sir,

We write to you on behalf of our Client, Star India Private. Ltd ("Our Client").

As you are aware the captioned suit was filed by Our Client against the rogue applications indulged in copyright infringement of Our Client's exclusive rights. In the present suit, Our Client has also impleaded various Domain Name Registrars (Defendant No. 4-8), Internet Service providers (Defendant No. 9-17) as well as the concerned government departments (Department of Telecommunication and the Ministry of Electronics and Information Technology) (Defendant No. 18 and 19), as Defendants, to ensure effective compliance of any orders that the Hon'ble Delhi High Court was inclined to pass.

The Hon'ble Justice Mr. Amit Bansal, Delhi High Court on 26<sup>th</sup> September 2024 was pleased to pass an *ex-parte ad-interim* order. The relevant para of the Order dated 26.09.2024 is extracted herein below:

"38. In view of the averments noted hereinabove and in view of the judgment passed in **UTV Software Communication Ltd.** (supra), this Court is of the opinion that a prima facie case is made out in favour of the plaintiff. Balance of convenience is also in favour of the plaintiff. Further, irreparable harm or injury would be caused to the plaintiff if an interim injunction order is not passed.

39. Accordingly, defendants No. 1 to 3 (and any such other UIs/websites which appears to be associated

with any of the defendant apps and websites based on its name, branding or the identity of its operator, or discovered to provide additional means of accessing, the defendant apps and websites, and other domains/domain/apps/UIs along with their sub domains and subdirectories, owners/website operators/entities which are discovered to have been engaging in infringing the plaintiff's exclusive rights), their owners, partners, proprietors, officers, servants, employees, and all others in capacity of principals or agents, acting for and on their behalf, or anyone claiming through, by or under them are hereby restrained, from, in any manner hosting, streaming, reproducing, distributing, making available to the public and/or communicating to the public, or facilitating the same, on their Apps/UIs/websites, through the internet in any manner whatsoever, any cinematograph work/content/programme/show in relation to which plaintiff has a copyright.

- 40. The defendants No. 4 to 8 shall ensure compliance with this order by blocking defendants no. 1 to 3 websites, their URLs and the respective UIs as filed along with the suit (Pg 1 Vol 1) (also annexed herewith as annexure A) and any other UIs/apps/websites notified by the plaintiff by filing of an affidavit.
- 41. The defendants no. 4 to 8, their directors, partners, proprietors, officers, affiliates, servants, employees, and all others in capacity of principal or agent acting for and, on their behalf, or anyone claiming through, by or under it, are directed to disclose the following information of the defendants no. 1 -3 (and any such other websites/UIs which are discovered during the course of the proceedings and notified on Affidavit by the plaintiff to have been infringing/ authorizing the infringement of the plaintiff's exclusive rights, copyrights and broadcast reproduction rights):
- A. Complete details (such as name, address, email address, phone number, IP address etc.) of the defendants no. 1 3 (and any such other websites/UIs which are discovered during the course of the proceedings and notified on Affidavit by the plaintiff to have been infringing/ authorizing the infringement of the plaintiff's exclusive rights, copyrights).
- B. Mode of payment along with payment details used for registration of domain name by the registrant i.e., defendant no. 1-3 (and any such other websites/UIs which are discovered during the course of the proceedings and notified on Affidavit by the plaintiff to have been infringing/ authorizing the infringement of the plaintiff's exclusive rights, copyrights).
- 42. The defendants No. 9 to 17 shall ensure compliance with this order by blocking defendants no. 1 to 3 websites, their URLs and the respective UIs as filed along with the suit (Pg 1 Vol 1) (also annexed herewith as annexure A) and any other apps/websites notified by the plaintiff by filing of an affidavit.
- 43. Defendants no. 18 and 19 are further directed to take immediate steps and issue requisite notifications within five working days, calling upon various internet and telecom service providers registered under them to block the aforementioned websites/UIs identified by the plaintiff."

Copy of the order dated 26.09.2024 is attached herewith.

Further, in order to tackle increasing piracy activities of rogue mobile applications especially during the ongoing Indian Premier League (IPL) Cricket Tournament, 2025, the Plaintiff had filed an application bearing I.A. 8790/2025 under Order 39 Rule 1 and 2. In the said application directions for real-time blocking of the UIs by the ISPs, DNRs and DOT/MEITY were sought by Our Client. The Hon'ble Delhi High Court was pleased to allow above application and pass following directions -

- "7. A prima facie case is made on behalf of the plaintiff.
- 8. The rampant piracy carried out by rogue websites during the ongoing IPL season discloses that there is an urgency to pass an order in favour of the plaintiff for real-time blocking of these websites.
- 9. Accordingly, it is directed that during the currency of the aforesaid event, if any further websites are discovered, which are illegally streaming and communicating content over which the plaintiff has copyright, the plaintiff is granted liberty to communicate the details of such websites to the defendants no.18 and 19 (DoT and MeitY) for issuance of blocking orders, and simultaneously to the ISPs/DNRs for blocking the said websites, so as to ensure that these websites can be blocked

on a real-time basis and there is no undue delay. Upon receiving the said intimation from the plaintiffs, the ISPs/DNRs shall take steps to immediately block the rogue websites in question. Likewise, the DoT and MeitY, upon the plaintiffs communicating the details of the websites, shall also immediately issue necessary blocking orders of the rogue websites which are illegally streaming the Event.

10. After communicating details of the rogue websites to the concerned authorities, the plaintiff shall file affidavits with the Court in order to ensure that the Court is fully informed of the websites in respect of which blocking orders are sought.

11. If any website, which is not primarily an infringing website, is blocked pursuant to the present order, they shall be permitted to approach the Court by giving an undertaking that it does not intend to engage in any unauthorized or illegal dissemination of the event or any other content over which the plaintiff has copyright. In such a situation the Court would consider modifying the injunction as the facts and circumstances, so warrant."

Copy of the order dated 04.04.2025 is attached herewith.

Pursuant to the above directions, Our Client has found 4 additional UIs used by the rogue mobile applications to illegally communicate and stream ongoing IPL. Evidence against these 4 UIs can be download from the link below:

https://drive.google.com/drive/folders/1cLRQGPVsp6VgBrhaytYv\_ZdssW3hiXX9?usp=drive\_link

List of these 4 additional UIs is also attached herewith.

Consequently, in terms of the directions passed by the Hon'ble Court, *vide* order dated 26<sup>th</sup> September 2024 (reproduced above i.e. paragraph 38 read with paragraph 39)) and 4<sup>th</sup> April 2025 (reproduced above i.e. paragraph 7 to 11) the *ex parte ad-interim* order is also applicable with respect to these 4 additional UIs.

In lieu of the above facts and circumstances, we respectfully urge you to immediately block access to the additional 4 domains / URLs, as set forth in the Order of the Hon'ble High Court of Delhi dated 26<sup>th</sup> September 2024 (*vide* paragraph 42) and 4<sup>th</sup> April 2025 (*vide* paragraph 9)

If you have any queries, please feel free to contact us.

Sincerely, Vivek Kumar

Vivek Kumar | Associate | Saikrishna & Associates, 57 Jor Bagh, Delhi - 110003, India| Tel: +91-11-40244360 (100 Lines) | [Enrolment No.: D/7260/2023, Patent Agent: IN/PA-5974]

- WTR 1000 Gold Ranked Firm- Enforcement & Litigation 2015, 2016, 2017 & 2018
- CHAMBERS ASIA PACIFIC 2015, 2016 & 2017 Leading Firm- IP & TM
- INDIAN BUSINESS LAW JOURNAL Law Firm Awards- Winner- Intellectual Property India- 2015
- INDIAN BUSINESS LAW JOURNAL Law Firm Awards- Winner- Technology Media & Telecommunication-India 2015
- INDIAN NATIONAL BAR ASSOCIATION IP Practice-Law Firm of the Year 2015
- MANAGING IP- Global Awards 2014- Firm of the Year- India- Contentious

The Information contained in this e-mail and/or in any of the attached files is confidential and proprietary information of Saikrishna & Associates and also the subject of legal professional privilege. This privilege is not waived or lost by mistaken transmission or receipt. If you are not the intended recipient, any use, disclosure or copying of this mail is unauthorised. If you have received this mail in error, please notify us at <a href="info@saikrishnaassociates.com">info@saikrishnaassociates.com</a> immediately by reply email and destroy the original.

On Mon, Apr 7, 2025 at 6:07 PM Vivek Kumar < v.kumar@saikrishnaassociates.com > wrote: Dear Sir,

We write to you on behalf of our Client, Star India Private. Ltd ("Our Client").

As you are aware the captioned suit was filed by Our Client against the rogue applications indulged in copyright infringement of Our Client's exclusive rights. In the present suit, Our Client has also impleaded various Domain Name Registrars (Defendant No. 4-8), Internet Service providers (Defendant No. 9-17) as well as the concerned government departments (Department of Telecommunication and the Ministry of Electronics and Information Technology) (Defendant No. 18 and 19), as Defendants, to ensure effective compliance of any orders that the Hon'ble Delhi High Court was inclined to pass.

The Hon'ble Justice Mr. Amit Bansal, Delhi High Court on 26<sup>th</sup> September 2024 was pleased to pass an *exparte ad-interim* order. The relevant para of the Order dated 26.09.2024 is extracted herein below:

- "38. In view of the averments noted hereinabove and in view of the judgment passed in **UTV Software Communication Ltd.** (supra), this Court is of the opinion that a prima facie case is made out in favour of the plaintiff. Balance of convenience is also in favour of the plaintiff. Further, irreparable harm or injury would be caused to the plaintiff if an interim injunction order is not passed.
- 39. Accordingly, defendants No. 1 to 3 (and any such other Uls/websites which appears to be associated with any of the defendant apps and websites based on its name, branding or the identity of its operator, or discovered to provide additional means of accessing, the defendant apps and websites, and other domains/domain/apps/Uls along with their sub domains and subdirectories, owners/website operators/entities which are discovered to have been engaging in infringing the plaintiff's exclusive rights), their owners, partners, proprietors, officers, servants, employees, and all others in capacity of principals or agents, acting for and on their behalf, or anyone claiming through, by or under them are <a href="hereby restrained">hereby restrained</a>, from, in any manner hosting, streaming, reproducing, distributing, making available to the public and/or communicating to the public, or facilitating the same, on their Apps/Uls/websites, through the internet in any manner whatsoever, any cinematograph work/content/programme/show in relation to which plaintiff has a copyright.
- 40. The defendants No. 4 to 8 shall ensure compliance with this order by blocking defendants no. 1 to 3 websites, their URLs and the respective UIs as filed along with the suit (Pg 1 Vol 1) (also annexed herewith as annexure A) and any other UIs/apps/websites notified by the plaintiff by filing of an affidavit.
- 41. The defendants no. 4 to 8, their directors, partners, proprietors, officers, affiliates, servants, employees, and all others in capacity of principal or agent acting for and, on their behalf, or anyone claiming through, by or under it, are directed to disclose the following information of the defendants no. 1 -3 (and any such other websites/UIs which are discovered during the course of the proceedings and notified on Affidavit by the plaintiff to have been infringing/ authorizing the infringement of the plaintiff's exclusive rights, copyrights and broadcast reproduction rights):
- A. Complete details (such as name, address, email address, phone number, IP address etc.) of the defendants no. 1 3 (and any such other websites/UIs which are discovered during the course of the proceedings and notified on Affidavit by the plaintiff to have been infringing/ authorizing the infringement of the plaintiff's exclusive rights, copyrights).
- B. Mode of payment along with payment details used for registration of domain name by the registrant i.e., defendant no. 1-3 (and any such other websites/UIs which are discovered during the course of the proceedings and notified on Affidavit by the plaintiff to have been infringing/ authorizing the infringement of the plaintiff's exclusive rights, copyrights).
- 42. The defendants No. 9 to 17 shall ensure compliance with this order by blocking defendants no. 1 to 3 websites, their URLs and the respective UIs as filed along with the suit (Pg 1 Vol 1) (also annexed herewith as annexure A) and any other apps/websites notified by the plaintiff by filing of an affidavit.

43. Defendants no. 18 and 19 are further directed to take immediate steps and issue requisite notifications within five working days, calling upon various internet and telecom service providers registered under them to block the aforementioned websites/UIs identified by the plaintiff."

Copy of the order dated 26.09.2024 is attached herewith.

Further, in order to tackle increasing piracy activities of rogue mobile applications especially during the ongoing Indian Premier League (IPL) Cricket Tournament, 2025, the Plaintiff had filed an application bearing I.A. 8790/2025 under Order 39 Rule 1 and 2. In the said application directions for real-time blocking of the UIs by the ISPs, DNRs and DOT/MEITY were sought by Our Client. The Hon'ble Delhi High Court was pleased to allow above application and pass following directions -

- "7. A prima facie case is made on behalf of the plaintiff.
- 8. The rampant piracy carried out by rogue websites during the ongoing IPL season discloses that there is an urgency to pass an order in favour of the plaintiff for real-time blocking of these websites.
- 9. Accordingly, it is directed that during the currency of the aforesaid event, if any further websites are discovered, which are illegally streaming and communicating content over which the plaintiff has copyright, the plaintiff is granted liberty to communicate the details of such websites to the defendants no.18 and 19 (DoT and MeitY) for issuance of blocking orders, and simultaneously to the ISPs/DNRs for blocking the said websites, so as to ensure that these websites can be blocked on a real-time basis and there is no undue delay. Upon receiving the said intimation from the plaintiffs, the ISPs/DNRs shall take steps to immediately block the rogue websites in question. Likewise, the DoT and MeitY, upon the plaintiffs communicating the details of the websites, shall also immediately issue necessary blocking orders of the rogue websites which are illegally streaming the Event.
- 10. After communicating details of the rogue websites to the concerned authorities, the plaintiff shall file affidavits with the Court in order to ensure that the Court is fully informed of the websites in respect of which blocking orders are sought.
- 11. If any website, which is not primarily an infringing website, is blocked pursuant to the present order, they shall be permitted to approach the Court by giving an undertaking that it does not intend to engage in any unauthorized or illegal dissemination of the event or any other content over which the plaintiff has copyright. In such a situation the Court would consider modifying the injunction as the facts and circumstances, so warrant."

Copy of the order dated 04.04.2025 is attached herewith.

Pursuant to the above directions, Our Client has found 5 additional UIs used by the rogue mobile applications to illegally communicate and stream ongoing IPL. Evidence against these 5 UIs can be download from the link below:

https://drive.google.com/drive/folders/1XS-UzPBsZXMYgBYnSL7J03HeN8LButin?usp=drive\_link

List of these 5 additional UIs is also attached herewith.

Consequently, in terms of the directions passed by the Hon'ble Court, *vide* order dated 26<sup>th</sup> September 2024 (reproduced above i.e. paragraph 38 read with paragraph 39)) and 4<sup>th</sup> April 2025 (reproduced above i.e. paragraph 7 to 11) the *ex parte ad-interim* order is also applicable with respect to these 5 additional UIs.

In lieu of the above facts and circumstances, we respectfully urge you to immediately block access to the additional 5 domains / URLs, as set forth in the Order of the Hon'ble High Court of Delhi dated 26<sup>th</sup> September 2024 (*vide* paragraph 42) and 4<sup>th</sup> April 2025 (*vide* paragraph 9)

If you have any queries, please feel free to contact us.

Sincerely,

Vivek Kumar

Vivek Kumar | Associate | Saikrishna & Associates, 57 Jor Bagh, Delhi - 110003, India| Tel: +91-11-40244360 (100 Lines) |

[Enrolment No.: D/7260/2023, Patent Agent: IN/PA-5974]

- WTR 1000 Gold Ranked Firm- Enforcement & Litigation 2015, 2016, 2017 & 2018
- CHAMBERS ASIA PACIFIC 2015, 2016 & 2017 Leading Firm- IP & TM
- INDIAN BUSINESS LAW JOURNAL Law Firm Awards- Winner- Intellectual Property India- 2015
- INDIAN BUSINESS LAW JOURNAL Law Firm Awards- Winner- Technology Media & Telecommunication-India 2015
- INDIAN NATIONAL BAR ASSOCIATION IP Practice-Law Firm of the Year 2015
- MANAGING IP- Global Awards 2014- Firm of the Year- India- Contentious

The Information contained in this e-mail and/or in any of the attached files is confidential and proprietary information of Saikrishna & Associates and also the subject of legal professional privilege. This privilege is not waived or lost by mistaken transmission or receipt. If you are not the intended recipient, any use, disclosure or copying of this mail is unauthorised. If you have received this mail in error, please notify us at <a href="mailto:info@saikrishnaassociates.com">info@saikrishnaassociates.com</a> immediately by reply email and destroy the original.

L

1. Delhi HC Order dated 26t....pdf

1.4 MB • ♡

٨

2. Order dated 4th April 2025.pdf 381.2 KB • ♦

 $\blacksquare$ 

List 3 (3 domains) - IPL 20... .xlsx 12.9 KB • ⊘

#### **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.