

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-46/2022-DS-II

Dated: 13.02.2024


To,
All Internet Service Licensee's

Subject: CS (Comm.) No. 700 of 2022; Star India Pvt. Ltd. & Anr. V/s serialghar.me & Ors., Before Hon'ble Delhi High Court.

Kindly find the enclosed Hon'ble Delhi High Court order dated 11.10.2022, and 33rd additional affidavit dated 07.02.2024 on the subject matter.

2. Please refer to **para 24(b)** of said court order and **para 7** of the said affidavit in respect of blocking of **9 websites** enumerated in **Annexure A** of affidavit.

3. Accordingly, in view of the above, all the Internet Service licensees are hereby instructed to take immediate necessary blocking action for compliance of the request in the affidavits as above in view of the said court order.


Director (DS-III)
Email: dirds2-dot@nic.in

Encl: A/A

Copy to:

- (i) Sh. V.Chinnasamy, Scientist E (chinnasamy.v@meity.gov.in), Electronics Niketan, Ministry of Electronics and Information Technology (MeitY) New Delhi (Respondent no. 45) for kind information and necessary action as per **Annexure B**
- (ii) Sh. Piyush Beriwal, (beriwal.lawyer@gmail.com) Sr. Panel Counsel for kind information.

(iii) Rimjhim Tiwari, (rimjhim@saikrishnaassociates.com) Associate, Saikrishna & Associates, counsel for the plaintiff for kind information.

(a) Take action as per Annexure B.

(iv) IT wing of DoT for uploading on DoT Website please.

\$~27

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

+ CS(COMM) 700/2022

STAR INDIA PVT LTD & ANR.

..... Plaintiffs

Through: Mr.Sidharta Chopra, Mr.Yatinder
Garg, Mr.Angad Singh Makkar,
Ms.Rimjhim Tiwari & Mr.Raunak
Das Sharma, Advs.

versus

SERIALGHAR.ME & ORS.

..... Defendants

Through: None.

CORAM:

HON'BLE MR. JUSTICE NAVIN CHAWLA

ORDER

%

11.10.2022

I.A. 16483/2022 (Exemption)

1. Allowed, subject to all just exceptions.

I.A. 16484/2022

2. This is an application filed on behalf of the plaintiffs seeking leave to file additional documents, which are not in the power, possession, control or custody of the plaintiff at the moment.

3. The plaintiffs may file the additional documents strictly in accordance with the provisions of the law.

4. The application stands disposed of.

I.A. 16485/2022

5. This is an application filed on behalf of the plaintiffs under Section 80 read with Section 151 of the Code of Civil Procedure, 1908 (in short, 'CPC') seeking exemption from issuing notice to the defendant nos. 36, 39, 44 and 45.

6. Having perused the contents of the application, the same is allowed.

CS(COMM) 700/2022

7. Let the plaint be registered as a suit.
8. Issue summons to the defendants to be served through all permitted modes, including electronically, returnable on 15th December, 2022 before the learned Joint Registrar (Judicial).
9. The summons to the defendant(s) shall indicate that the written statement(s) to the plaint shall be positively filed within a period of 30 days from the date of receipt of summons. Along with the written statement(s), the defendant(s) shall also file the affidavit(s) of admission/denial of the documents of the plaintiffs, without which the written statement(s) shall not be taken on record.
10. Liberty is given to the plaintiffs to file the replication(s) within a period of 15 days of the receipt of the written statement(s). Along with the replication(s), if any, filed by the plaintiffs, the affidavit(s) of admission/denial of documents of the defendant(s) be filed by the plaintiffs, without which the replication(s) shall not be taken on record. If any of the parties wish to seek inspection of any documents, the same shall be sought and given within the timelines.

I.A. 16482/2022

11. Issue Notice.
12. On the plaintiffs taking steps, let notice be served on the defendants through all permissible modes, including electronically, returnable on 15th December, 2022 before the learned Joint Registrar (Judicial).
13. The plaintiffs have filed the present suit seeking an injunction to restrain the illegal and unauthorised dissemination of the plaintiffs' original content/works in the '*general entertainment*' category, which fall within the

definition of 'cinematograph films' under Section 2(f) of the Copyright Act, 1957 (in short, 'the Act'). It is the case of the plaintiffs that they are the producers of the cinematograph films and as such have exclusive rights enumerated under Section 14(d) of the Act, including *inter-alia* to publicly exhibit and communicate the said content/works through any media.

14. The plaintiff no. 1 herein is a leading entertainment and media company in India engaged, *inter-alia*, in the production of popular content broadcast on its STAR channels. The plaintiff no. 1, along with its affiliates, is the owner of an extensive portfolio of more than seventy channels in over eight languages. The STAR Channels and the content aired therein occupy a commanding position and have acquired tremendous goodwill and reputation in the entertainment industry and amongst the general public. By virtue of the necessary uplink and downlink permissions issued by the Ministry of Information and Broadcasting, Government of India (in short, 'MIB'), the plaintiff no. 1 has the sole and exclusive right to broadcast and distribute STAR Channels in India.

15. The plaintiff no. 2, owns and operates the online audio-visual streaming platform and website, www.hotstar.com and the mobile application, '**Disney+ Hotstar**'. '**Disney+ Hotstar**' offers over 8 Lakh hours of TV shows and movies across 8 languages, Disney+ originals, exclusive new content from the '**Hotstar Specials**' label, regional and national news, and coverage of every major global sporting event.

16. It is asserted that apart from owning and managing '**Disney+ Hotstar**', the plaintiff no. 2 is also the producer/exclusive assignee/licensee of web-series original content in various languages including in Hindi and English, which is made accessible only on '**Disney+ Hotstar**'.

17. The present suit has been filed by the plaintiffs, against the following defendants:

- a) The defendant nos. 1 to 27 are claimed to be '*rogue websites*';
- b) The defendant nos. 28 to 34 are the Domain Name Registrars (hereinafter referred to as 'DNRs') of the domain names used by the '*rogue websites*';
- c) The defendant nos. 35 to 43 are the Internet Service Providers (hereinafter referred to as the 'ISPs');
- d) The defendant nos. 44 and 45 are the Department of Telecommunication (in short, 'DoT') and the Ministry of Electronics and Information Technology (in short, 'MEITY'), respectively;
- e) The defendant no. 46 has been impleaded as '*John Doe*' in the name of '*Ashok Kumar*'.

18. The content on '**Disney+ Hotstar**' and the STAR Channels produced by the plaintiffs forms the subject matter of the instant suit. As described in paragraph nos. 6 and 7 of the plaint, the plaintiffs are the producers of various TV Shows, films and/or web-series which are communicated on STAR Channels and/or '**Disney+ Hotstar**' and have the exclusive distribution rights to publicly exhibit and communicate the said content through any medium or mode including on the STAR Channels or '**Disney+ Hotstar**'. They are protected as '*cine-matograph films*' under Section 2(f) read with Section 13 of the Act.

19. It is asserted that the defendant nos. 1 to 27 are liable for infringement of copyright under various provisions of Section 51 of the Act. The various 'exclusive rights' that, *inter alia*, would be deemed to have been infringed/ violated by the defendant nos. 1 to 27 are:

a) The right of making a copy of the plaintiffs' cinematograph films including the storing of it in any medium by electronic or other means;

b) The right of communicating the plaintiffs' cinematograph films to the public.

20. Having considered the contents of the plaint and documents filed therewith, and having heard the learned counsel for the Plaintiffs, the Court is of the opinion that the plaintiffs have made out a *prima facie* case for grant of an *ex-parte ad-interim* injunction, which is also a dynamic injunction. The balance of convenience lies in favour of the plaintiffs and irreparable injury would be caused if the interim injunction is not granted. Disclosure orders are also liable to be passed against the DNRs, and further, the defendant nos. 44 and 45 ought to also issue blocking orders to all the ISPs, to block the said rogue websites. Considering the investment which the plaintiffs have made in producing these works, any illegal broadcasting would severely affect the monetary interest of the plaintiffs, and also diminish the value of the rights of works.

21. Accordingly, till further orders, an *ad-interim ex-parte* order in terms of the prayer made in paragraph 11(i) of the present application is passed against the defendant nos. 1 to 27.

22. The DNRs shall also immediately block the said domain names and maintain *status quo* thereof. The said DNRs shall also disclose to the plaintiffs the following:

a) Complete details (such as Name, Address, Email Address, Phone Number, IP Address etc.) of the defendant nos. 1 to 27 and such other websites which are discovered during the course of the proceedings

and notified on affidavit by the plaintiffs to have been infringing the plaintiffs' exclusive rights, copyrights and broadcast reproduction rights.

b) Mode of Payment along with payment details used for registration of domain name by the Registrant, that is the defendant nos. 1 to 27 and such other websites which are discovered during the course of the proceedings and notified on affidavit by the plaintiffs to have been infringing the plaintiffs' exclusive rights, copyrights and broadcast reproduction rights.

c) Details of other websites registered by the defendant nos. 1 to 27 and such other websites which are discovered during the course of the proceedings and notified on affidavit by the plaintiffs to have been infringing the plaintiffs' exclusive rights, copyrights and broadcast reproduction rights using similar details, same credit card, payment gateway etc. (disclosed as per Clause b above) with the defendant nos. 28 to 34.

d) Details of Complaints received by the defendant nos. 28 to 34 in past against the defendant nos. 1 to 27 and such other websites which are discovered during the course of the proceedings and notified on affidavit by the plaintiffs to have been infringing the plaintiffs' exclusive rights, copyrights and broadcast reproduction rights.

23. The defendant nos. 44 and 45, as also the ISPs, shall block the defendant nos. 1 to 27 websites. The said blocking orders shall be issued by the defendant no. 44 within 24 hours after service of this order. Pursuant to the said blocking order/s, all the ISP's, that is, the defendant nos. 35 to 43, shall block access to the URL's, as also the mobile applications within 24

hours and shall not permit the download of these applications or the streaming of the rogue websites.

24. If the plaintiffs discover other mirror websites or rogue websites which are broadcasting and/or telecasting the cinematograph films which are covered by the present suit, they may:

a) File an affidavit in this regard before the Court along with evidence thereof. The said websites shall stand blocked with immediate effect, upon notice being issued by the plaintiffs to the defendant no. 44 and ISPs that such an affidavit has already been filed before this Court.

b) Upon the defendant no. 44 receiving the notices and communications from the plaintiffs that the affidavits have been filed before the Court, the orders for blocking such further rogue websites shall be passed, immediately and in any case, within 24 hours, so that the websites do not continue to stream infringing content in any manner whatsoever.

25. Compliance with Order XXXIX Rule 3 of the CPC be made by within a period of two days.

26. *Dasti.*

OCTOBER 11, 2022/rv/AB



Sd/
NAVIN CHAWLA, J

IN THE HIGH COURT OF DELHI AT NEW DELHI
(ORIGINAL COMMERCIAL JURISDICTION)
CS (COMM) NO. OF 2022

IN THE MATTER OF

Star India Pvt. Ltd. & Anr.

...Plaintiffs

Versus

serialghar.me

...Defendants

MEMO OF PARTIES

1. Star India Pvt. Ltd.

Star House, Urmi Estate,
95, Ganpatrao Kadam Marg,
Lower Parel (W),
Mumbai- 400013

Also, at:

Vatika Business Centre, Thapar House,
Gate No. 1, Eastern & Central Wing
3rd Floor, 124 Janpath
New Delhi -110001
Email: diksha.snehal@startv.com

2. Novi Digital Entertainment Pvt. Ltd.

Star House, Urmi Estate,
95, Ganpatrao Kadam Marg, Lower Parel (W),
Mumbai- 400013
Email: diksha.snehal@startv.com

..... Plaintiffs



Versus

1. serialghar.me
Email: copyright@serialghar.me
2. dramamasti.net
Email: admin@dramamasti.net
3. ishqmeinmarjawan3.com
Email: admin@ishqmeinmarjawan3.com
4. yodesiserials.su
Email: admin@yodesiserials.su
5. marjawan.net
Email: admin@marjawan.net
6. badeacchelagtehain.net
Email: admin@badeacchelagtehain.net
7. badeachhe.com
Email: admin@badeachhe.com
8. balikavadhu2.com
Email: admin@balikavadhu2.com
9. chikooyehishqnachaye.com
Email: admin@chikooyehishqnachaye.com



10. desiserialwatch.com
Email: admin@desiserialwatch.com
11. herogayab.co
Email: admin@herogayab.co
12. hindiserial.xyz
Email: admin@hindiserial.xyz
13. kaamna.net
Email: admin@kaamna.net
14. khatronkekhiladiseason12.com
Email: admin@khatronkekhiladiseason12.com
15. kkk12tv.com
Email: admin@kkk12tv.com
16. urdudramas.su
Email: phemaraif@gmail.com
17. wohtohhaialbela.net
Email: admin@wohtohhaialbela.net
18. yehjhukijhukisinazar.net
Email: admin@yehjhukijhukisinazar.net
19. bdstory.online
Email : joyminprup@gmail.com

20. bdstory.xyz
Email : joyminprup@gmail.com
21. desitelugu.net
Email : admin@desitelugu.net
22. faana.net
Email : admin@faana.net
23. goribergf.com
Email : goriberggirlfriend@gmail.com
24. okmalayalam.com
Email : admin@mullapoo.com
25. serialhub.xyz
Email : admin@serialhub.xyz
26. showpm.website
Email : admin@showpm.website
27. tolypratidin.online
Email : ollypratidin@gmail.com
28. NameCheap, Inc.
Module 403, Tidel Par
Coimbatore Ltd Elcosez Aerodrom
Coimbatore, TN – 641014



Also, at:

4600 East Washington Street
Suite 305, Phoenix, AZ – 85034
USA

Email: support@namecheap.com, legal@namecheap.com

29. Dynadot LLC

210 S Ellsworth Ave
#345 San Mateo, CA
94401 US

Email: info@dynadot.com

30. ARDIS-SU

236010, Kaliningrad,
18 Tenistaya Alley St.

Email: support@ardis.ru

31. PDR Ltd. d/b/a PublicDomainRegistry.com

501, IT Building No 3,
NESCO IT Park, NESCO Complex,
Western Express Highway, Goregaon (East),
Mumbai – 400063 Maharashtra, India

Email: compliance@publicdomainregistry.com

32. Tucows Domains Inc.

96 Mowat Avenue, Toronto,
Ontario, M6K 3M1, Canada

Email: info@tucows.com

Dr.

33. Hosting Concepts B.V. d/b/a Registrar.eu
Kipstraat 3c-5c
Rotterdam 3011 RR
Netherlands
+31 104482296
Email : support@openprovider.com

34. Hostinger, UAB
Jonavos g. 60C
Kaunas, Lithuania - 44192
+37064503378
E-mail ID: domains@hostinger.com; abuse@hostinger.com

35. Atria Convergence Technologies Private Limited
99A/113A, Manorayana Palya
R.T. Nagar Bangalore – 560032.

Also, at:

2nd and 3rd 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

36. 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.

37. Bharti Airtel Ltd.

Airtel Centre, Tower-A, 6th floor
'A' Wing, Plot No.16, Udyog Vihar
Ph - IV, Gurgaon – 122016
E-mail: amit.bhatia@airtel.com

38. Hathway Cable & Datacom Pvt. Ltd.

'Rahejas', 4 floor, Main Avenue
Santacruz (W), Mumbai-400054
E-mail: ajay.singh@hathway.net; dulal@hathway.net;
sudhir.shetye@hathway.net

39. Mahanagar Telephone Nigam Ltd.

5th Floor, Mahanagar Doorsanchar Sadan
9, CGO Complex, Lodhi Road
New Delhi – 110003
E-mail: raco.mtnl@gmail.com; mtnlcsc@gmail.com
gmracomtnl@gmail.com

40. Reliance Jio Infocomm Limited

RCP 14 (TC 23), Phase 4,
B-Block, 3rd Floor,
C 4 130 Twane- belapur Road,
Gansoli, Navi Mumbai- 400701
E-mail: care@jio.com; Hitesh.marthak@relianceada.com;
Kapoor.guliani@ril.com; mahipal.singh@ril.com;

14

sunil.kr.gupta@ril.com; shilpi.kant@ril.com;
jyoti.jain@ril.com; rudraksha.sinha@ril.com;
neelakantan.an@ril.com

41. 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

42. 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

43. 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
 Florencia.Depores@vodafoneidea.com;
 Raaj.Goyal@vodafoneidea.com

44. Department of Telecommunications

Through Secretary,

Ministry of Communications and IT,

20, Sanchar Bhawan, Ashoka Road,

New Delhi – 110001

E-mail: secy-dot@nic.in, dirids2-dot@nic.in

45. 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;

adetds2-dot@gov.in

46. Ashok Kumar(s)

...Defendants

Place: New Delhi

Date: 7th October 2022


 Saikrishna and Associates

Advocates for the Plaintiffs

57 Jor Bagh,

New Delhi - 110003

+91 9999064036

yatinder@saikrishnaassociates.com

NOTE: Defendant No. 1 along with the Defendant Nos. 2 - 27 are the main contesting parties.



IN THE HIGH COURT OF DELHI AT NEW DELHI
(ORDINARY ORIGINAL COMMERCIAL JURISDICTION)
CS (COMM) NO. 700 OF 2022

IN THE MATTER OF:

Star India Pvt. Ltd.

..... Plaintiffs

Versus

Serialghar.me & Ors.

..... Defendants

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Place: New Delhi

Date: 07.02.2024



Rimjhim Tiwari

(D/4021/2022)

Saikrishna and Associates

Advocates for Plaintiffs

rimjhim@saikrishnaassociates.com

IN THE HIGH COURT OF DELHI AT NEW DELHI
 (ORDINARY ORIGINAL COMMERCIAL JURISDICTION)
 CS (COMM) NO. 700 OF 2022

IN THE MATTER OF

Star India Pvt. Ltd. & Anr.

...Plaintiffs

Versus

Serialghar.me & Ors.

...Defendants

AFFIDAVIT OF MR. ANKUSH MAHAJAN, S/O MR. MANMOHAN MAHAJAN, AGED ABOUT 43 YEARS, AUTHORIZED SIGNATORY OF PLAINTIFFS, HAVING ITS OFFICE AT STAR HOUSE, URMI ESTATE, 95 GANPATRAO KADAM MARG, LOWER PAREL (W), MUMBAI, 400013, PRESENTLY AT NEW DELHI

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

1. That, I am the Authorized Representative of the Plaintiffs in the present suit and as such I am conversant with the facts and circumstances of the present suit and competent to depose in respect thereof.

2. I state that I am aware of the present suit and the order dated 11.10.2022 whereby the Hon'ble Court was pleased to pass an *ex-parte ad-interim* order in terms of the following:



“20. Having considered the contents of the plaint and documents filed therewith, and having heard the learned counsel for the Plaintiffs, the Court is of the opinion that the plaintiffs have made out a prima facie case for grant of an ex-parte ad-interim injunction, which is also a dynamic injunction. The balance of convenience lies in favour of the plaintiffs and irreparable injury would be caused if the interim injunction is not granted. Disclosure orders are also liable to be passed against the DNRs, and further, the defendant nos. 44 and 45 ought to also issue blocking orders to all the ISPs, to block the said rogue websites. Considering the investment which the plaintiffs have made in producing these works, any illegal broadcasting would severely affect the monetary interest of the plaintiffs, and also diminish the value of the rights of works.

21. Accordingly, till further orders, an ad-interim ex-parte order in terms of the prayer made in paragraph 11(i) of the present application is passed against the defendant nos. 1 to 27.

XXX



23. The defendant nos. 44 and 45, as also the ISPs, shall block the defendant nos. 1 to 27 websites. The said blocking orders shall be issued by the defendant no. 44 within 24 hours after service of this order. Pursuant to the said blocking order/s, all the ISP's, that is, the defendant nos. 35 to 43, shall block access to the URLs, as also the mobile applications within 24 hours and shall not permit the

download of these applications or the streaming of the rogue websites.”

3. I state that the Plaintiffs had acquired relevant rights for the various web-series / TV shows “Big Boss Telugu Season 6”, “Guddi”, “Bikram Beta”, “Anupama”, “Koffee With Karan Season 6 & 7”, “Criminal Justice”, etc. (“**Plaintiffs’ Works**”) on the digital platform operated by Plaintiff No. 2, i.e., Disney+ Hotstar. In order to protect and enforce its exclusive rights in the Plaintiffs’ Works, the Plaintiffs engaged the services of an investigation agency to monitor rogue websites which are hosting, streaming, communicating in any manner and/or making available for viewing and downloading, without authorisation, the Plaintiffs’ Works. I state that the following 16 websites have been identified by the investigation agency engaged in illegally communicating the Plaintiffs’ Works:

S. No.	Websites
1.	5movierulzhd.cc
2.	jhanak.net
3.	ww2.coolmoviez.com.se
4.	mkvmoviespoint.40220u.com
5.	ssrmovies.mov
6.	terimeridoriyaan.su
7.	naagin-7.com
8.	yodesiserial.live
9.	nkdmovies.link

4. I state that from the evidence filed along with the present Affidavit, it is evident that the above-mentioned 9 websites are hosting and/or streaming and/or providing access and/or



making available for viewing or downloading, without authorization, the Plaintiffs' Works. I state that the Plaintiffs are the exclusive right holders for the distribution of the Plaintiffs' Works for the worldwide territory and the Plaintiffs have not authorised the above-mentioned websites to communicate and or make available for viewing and/or downloading said Plaintiffs' Works.

5. I state that the Plaintiffs are not aware of the owners of these 9 rogue websites as either they are anonymous or have incorrect or incomplete addresses.
6. I state that in terms of the following directions passed by this Hon'ble Court, *vide* order dated 11.10.2022, *ex parte ad-interim* order dated 11.10.2021 (reproduced herein above) is also applicable on the above-mentioned websites.

"24. If the plaintiffs discover other mirror websites or rogue websites which are broadcasting and/or telecasting the cinematograph films which are covered by the present suit, they may:

a) File an affidavit in this regard before the Court along with evidence thereof. The said websites shall stand blocked with immediate effect, upon notice being issued by the plaintiffs to the defendant no. 44 and ISPs that such an affidavit has already been filed before this Court.



b) Upon the defendant no. 44 receiving the notices and communications from the plaintiffs that the affidavits have been filed before the Court, the orders for blocking such further rogue websites shall be passed, immediately and in any case, within 24 hours, so that the websites do not continue to stream infringing content in any manner whatsoever.”

7. In light of the abovementioned, the Department of Telecommunications (Defendant No. 44) and the Ministry of Electronics and Information Technology (Defendant No. 45) are urged to issue a notification to the Internet Service Providers (Defendant Nos. 35- 43) to block the additional rogue websites identified in Annexure A hereto.

4. I state that the evidence filed along with the present affidavit was shared by the investigating agency in google drive link. I downloaded the same onto the computer (Intel (R) Core (TM) i5-2520M CPU @ G2010 @ 2.50 GHz 2.50 GHz) which is regularly used by me in the ordinary course of business and thereafter, shared the same with the Plaintiffs' Counsel.

5. I am advised to state that the conditions of Sections 65B of the Indian Evidence Act, 1872 and Order XI Rule 6(3) of the Commercial Courts, Commercial Division and Commercial Appellate Division of High Courts Act, 2015 are complied with in respect of these documents.

6. In particular, I confirm:-



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



DEPONENT

VERIFICATION

07 FEB 2024

Verified at New Delhi on this the 07th of February 2024 that the contents of the above said Affidavit are true to the best of knowledge, information and belief and nothing material has been concealed therefrom.

Prayjium
I identified the deponent who has signed in my presence.

[Signature]
DEPONENT



CERTIFIED THAT THE DEPONENT:
Shri/Smt./Km. *Ankur Mahajan*
S/o, W/o *Poo*
.....
Identified by *Sr. Adv. Prayjium*
Has solemnly sworn before me at
Delhi on *07/02/2024* at No. *208*
That the contents of the affidavit which
have been read & explained to him/her
are true & correct to his/her knowledge

[Signature]
NOTARY

07 FEB 2024

ANNEXURE A
LIST OF WEBSITES

S. No.	Websites
1.	5movierulzhd.cc
2.	jhanak.net
3.	ww2.coolmoviez.com.se
4.	mkvmoviespoint.40220u.com
5.	ssrmovies.mov
6.	terimeridoriyaan.su
7.	naagin-7.com
8.	yodesiserial.live
9.	nkdmovies.link

Annexure B

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.