



\$~37

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

+ **CS(COMM) 1107/2025 & I.A. 25665-25667/2025**

**HRITHIK ROSHAN**

.....Plaintiff

Through: Mr. Sandeep Sethi, Sr. Adv. with Mr. Nizam Pasha, Mr. Parag Khandhar, Ms. Chandrima Mitra, Mr. Krishan Kumar, Mr. Tapan Radkar, Ms. Pratyusha Dhoddha, Mr. Sidharth Kaushik and Ms. Shreya Sethi, Advs.

versus

**ASHOK KUMAR/JOHN DOE & ORS.**

.....Defendants

Through: Mr. Nitin Sharma and Mr. Angad S. Makkar, Advs. for D-14

Ms. Surabhi Pande and Ms. Arushi Mann, Advs. for D-15

Mr. Shubh Kapoor (through vc), Mr. Anirudh Dusaj and Mr. Bhavyah Garg, Advs. for D-17

Mr. Vivek Ayyagari (through vc), Ms. Srishti Dhoundiyal and Mr. Manas Raghuvanshi, Advs. for D-27

Ms. Anushka Sarda, Adv. for D-29

Mr. Aditya Gupta, Adv. for D-31

Mr. Varun Pathak, Ms. Sana Banyal and Ms. Varsha Jhavar, Advs. for D-32



**CORAM:**  
**HON'BLE MS. JUSTICE MANMEET PRITAM SINGH ARORA**

**ORDER**

% **15.10.2025**

**I.A. 25666/2025 (seeking exemption from pre- litigation mediation)**

1. This is an application filed under Section 12A of the Commercial Courts Act, 2015 read with Section 151 Code of Civil Procedure, 1908 ('CPC'), filed by the Plaintiff seeking exemption from instituting pre-litigation mediation.

2. Having regard to the facts that the present suit contemplates urgent interim relief and in light of the judgement of the Supreme Court in **Yamini Manohar v. T.K.D. Keerthi**<sup>1</sup>, exemption from the requirement of pre-institution mediation is granted to the Plaintiff. Moreover, in this case reliefs are also sought against unknown entities impleaded as Defendant No. 1/John Doe and no pre-suit mediation is possible with these entities.

3. Accordingly, the application stands disposed of.

**I.A. 25667/2025 (seeking exemption from filing list of dates/synopsis)**

4. This is an application filed under Section 151 CPC on behalf of the Plaintiff, seeking exemption from filing lengthy list of dates and synopsis.

5. For the reasons stated in the application, the application is allowed.

6. Accordingly, the applications stand disposed of.

**CS(COMM) 1107/2025**

7. The present suit has been filed seeking permanent injunction restraining the Defendants from misappropriation of personality rights, publicity rights, infringement of copyright, performer's rights and passing off, along with other ancillary relief.



8. Let the plaint be registered as a suit.
9. Issue summons.
10. Summons be issued to Defendant Nos. 2, and 8 to 12 ['infringing Defendants'] only by all permissible modes on filing of process fee. An affidavit of service be filed within two (2) weeks.
11. The summons shall indicate that the written statement(s) must be filed within thirty (30) days from the date of receipt of the summons. The Defendants shall also file affidavit(s) of admission/denial of the documents filed by the Plaintiff, failing which the written statement(s) shall not be taken on record.
12. The Plaintiff is at liberty to file replication thereto within thirty (30) days after filing of the written statement(s). The replication shall be accompanied by affidavit of admission/denial in respect of the documents filed by Defendants, failing which the replication shall not be taken on record.
13. It is made clear that any unjustified denial of documents may lead to an order of costs against the concerned party.
14. Any party seeking inspection of documents may do so in accordance with the Delhi High Court (Original Side) Rules, 2018.
15. No summons has been issued to Defendant Nos. 3 to 7, 13 to 28 and Defendant Nos. 29 to 33 since they are 'proforma Defendants'. Directions for compliance have been issued qua said Defendants in I.A. 25665/2025.
16. Defendant No. 1 is John Doe, as plaintiff has sought relief against unknown entities. After Plaintiff has received Basic Subscriber Information['BSI'] details from the proforma Defendants with respect to the

---

<sup>1</sup> (2024) 5 SCC 815



unknown entities, it shall file an amended memo of parties within two (2) weeks from receipt of an information and thereafter summons will be issued to the said identified entities.

17. The Plaintiff will also incorporate the correct details of Defendant No. 27/Amazon while filing the amended memo of parties.

18. List before the learned Joint Registrar (J) on **04.12.2025**.

19. List before Court on **27.03.2026**.

**I.A. 25665/2025 (application under Order XXXIX Rules 1 and 2)**

20. This is an application filed under Order XXXIX, Rules 1 and 2 read with Section 151 of the CPC on behalf of the Plaintiff seeking an ad interim injunction restraining the Defendants from infringing the Plaintiff's personality rights, copyright, publicity rights, along with other ancillary reliefs.

21. Mr. Sandeep Sethi, learned senior counsel for the Plaintiff sets the Plaintiff's case as under:

21.1 The Plaintiff, Mr. Hrithik Roshan, born in Mumbai to renowned filmmaker Rakesh Roshan, began his acting career as a child artist. He made his debut as a lead actor in 'Kaho Naa Pyaar Hai', which became a blockbuster success and earned him multiple prestigious awards including the Filmfare Awards for Best Actor and Best Male Debut.

21.2 The Plaintiff received widespread recognition for his portrayal in 'Koi Mil Gaya'. The film's fictional character 'Jadoo' also became widely associated with him. Following this success, he starred in several acclaimed films such as 'Krrish', 'Fiza', 'Mission Kashmir', 'Yaadein', and 'Super 30', showcasing his versatility as an actor and dancer, and establishing himself as a leading figure in contemporary Indian cinema.



21.3 The Plaintiff is a successful actor, having acted in over 25 films. Additionally, the Plaintiff has endorsed many national and international brands, significantly enhancing their market presence through his association. The Plaintiff is a shareholder in XS Brands Consultancy Pvt. Ltd., which owns the activewear and fitness brand 'HRX', named after the Plaintiff. HRX is associated with the Plaintiff's initials and personal values of health and fitness, contributing to the brand's rapid growth in India.

21.4 The Plaintiff is also a director at Filmkraft Productions (India) Pvt. Ltd., a leading production house responsible for several well-known films. The Plaintiff in his career has already received multiple prestigious awards, including the National Citizen's Award, 6 Filmfare Awards, 8 IIFA Awards, 7 Zee Cine Awards, and 5 Screen Awards.

21.5 The Plaintiff has a long and respected career in cinema, gaining admiration from audiences in India and worldwide. The Plaintiff has created an invaluable asset for himself in the form of the love and admiration he has with the millions of fans in India and abroad. He has a significant social media presence on social media platforms, with 48M followers on Instagram, 32.2M on X, and 48.1M on Facebook, and these numbers are growing each day. He has represented well-known brands like Zebronic, Mountain Dew, and Gillette as their brand ambassador.

#### **Defendants' Infringing Actions**

21.6 Defendant Nos. 1, along with infringing Defendants are unlawfully using the Plaintiff's personality traits for commercial gain, by infringing on his publicity rights and damaging his reputation by creating vulgar and obscene content with the use of Artificial Intelligence ['AI'].

21.6.1 Defendant Nos. 3 to 7 are Domain Name Registrants ['DNRs'] and



there are domain names registered with these DNRs which have hosted infringing material which violates the Plaintiffs personality rights. Defendant nos. 13 to 28 and Defendant Nos. 29 to 33 are e-platforms used by the infringing Defendants for this misuse and have been impleaded for compliance purposes.

21.6.2 Defendant No. 1 is Ashok Kumar/John Doe, representing the unidentified person/unknown entities who are violating the Plaintiff's personality rights and publicity rights.

21.6.3 Defendant No. 2/Jammable Limited operates a website that enables its users to create audio clips, through Artificial Intelligence, in the Plaintiff's voice.

21.6.4 Defendant Nos. 3 to 7 are Domain Name Registrants ['DNRs'], wherein domain names have been registered, which host websites against which the Plaintiff has raised a grievance. It is stated that these websites allow its users to create morphed images, memes, Artificial Intelligence generated content including text/images/audio clips, that exploit Plaintiff's image, personality, voice and other attributes.

21.6.5 Defendant Nos. 8 to 10 own and operate websites, which are offering mobile applications. These applications misuse Plaintiff's image/voice/name and other personality attributes, without his authorization and thus to violate personality rights.

21.6.6 Defendant No. 11 is a webpage wrongfully projecting to the public at large that Plaintiff is the founder of Defendant No. 4/Markmonitor.Inc.

21.6.7 Defendant No. 12/GIPHY is an online database to search and share images/GIFs and this database permits exploitation of the Plaintiff's image/likeness/name and other personality attributes.





21.6.8 Defendant Nos. 13 to 28 are various online e-marketplaces/e-commerce websites used by third-parties to sell the products/merchandise unauthorizedly using various personality attributes of the Plaintiff and making monetary benefit out of it.

21.7 It is stated that infringing Defendants are misusing the Plaintiff's name, images, and attributes, including morphed and AI-generated content, to deceive his fans for illegal profits, violating his personality and publicity rights. The Plaintiff asserts that no one can use his personality rights without his consent. It is stated that some of the content is also vulgar and demeans the Plaintiff.

#### **Submissions by the Plaintiff**

22. Mr. Sethi, learned senior counsel submits that due to the said actions by the infringing Defendants, the Plaintiff faces significant economic loss, particularly affecting his endorsement income, which is crucial for him. He states that, Plaintiff has built a strong personal brand associated with trust and quality, and he is careful about the brands he endorses to protect his reputation; and any misuse of his persona by third parties can confuse the public and harm his business relationships as well as his goodwill his fans.

22.1 He submits that several aspects of Plaintiff's personality form his valuable intellectual property, which includes his fans' love, goodwill, name, physical appearance, voice, moral rights over his works, and signature dance steps, on various platforms, modes and mediums as mentioned at paragraph 65 of the plaint. He states that the infringing Defendants have violated Plaintiff's personality rights through actions such as misusing his image and voice with AI, selling merchandise without permission, impersonating him, and creating disparaging content about him using AI and



other techniques; as also by creating vulgar content.

22.2 He states that in view of the aforesaid, the Plaintiff prays for grant of an ex-parte ad-interim injunction in favour of the Plaintiff and against the infringing Defendants.

**Submissions by the Defendants'**

23. Mr. Varun Pathak, learned counsel appearing on behalf of Defendant No. 32/Meta Platforms states that the relevant document placed on record pertaining to the said Defendant is document nos. 23, 26, 31 and 40.

23.1 He states that at document no. 26, there are social media profiles that are declared fan pages of the Plaintiff. He states that subject to the Plaintiff providing links for individual posts on these fan pages, which he finds offensive, and which satisfy this Court, Defendant no. 32 will take down those individual posts. He states that, however, removing the entire profiles of these fan pages may be a disproportionate direction.

23.2 He states that with respect to document no. 23, 31 and 40 he will abide by the directions of the Court.

24. Mr. Aditya Gupta, learned counsel appearing on behalf of Defendant No. 31/Google LLC states that the relevant documents placed on record pertaining to the said Defendant are document nos. 6, 30, 32, 39 and 43.

24.1 He states that with respect to document no. 32, it is submitted that the documents placed at page 123 and page 125 has been posted by Mashable and DNA India respectively. He states that therefore, the limited action that the Defendant No. 31 can take is to de-index these posts upon a specific URL being provided by the Plaintiff.

24.2 He states that with respect to document no. 43, the Plaintiff may be directed to provide specific URLs of the GIFs that he wants to be taken





down, and upon receiving the said URLs, Defendant No. 31, will take the appropriate action.

24.3 He states that with respect to document nos. 6, 30 and 39 he will abide by the directions of the Court.

25. In response, learned senior counsel for the Plaintiff states that the specific URLs, of the infringing content on the platform of 'Tenor', as well as of the documents placed at page 123 and page 125 which has been posted by Mashable and DNA India, will be communicated to the Defendant No. 31 for take down.

26. Ms. Anushka Sarda, learned counsel appearing on behalf of the Defendant No. 29/Telegram states that the said Defendant will take down the three (3) URLs listed at document no. 24, subject to the directions of this Court.

27. Mr. Nitin, learned counsel appearing on behalf of Defendant No. 14/Ebay Inc. states that the said Defendant shall take down the three (3) listings provided in document no. 8, subject to the directions of the Court.

28. Mr. Vivek, learned counsel appearing on behalf of Defendant No. 27/Amazon states that the name of the entity mentioned in the memo of parties is incorrect and the correct details will be provided to the counsel for the Plaintiff during the course of the day.

28.1 He states that the infringing links provided in document no. 21 will be taken down, subject to the directions of this Court.

29. Mr. Shubh, learned counsel appearing on behalf of Defendant no. 17 states that infringing URLs provided at document no. 11 have already been taken down upon service of the advance paper book of the present suit on 14.10.2025. He states that if the Plaintiff had served the notice before



approaching the Court, Defendant no. 17 would have taken these down of its own accord.

29.1 The statement of Defendant no. 17 is taken on record and it is bound down to the same.

30. Ms. Surabhi, learned counsel appearing on behalf of Defendant No. 15/Flipkart states that out of the two (2) URLs provided at document no. 9, the URL at page no. 76 has already been taken down, and with respect to the URL at page no. 77, the same will be taken down upon the directions of this Court.

#### **Findings and Directions of the Court**

31. This Court has heard the learned counsel of the Plaintiff and perused the record.

32. In the present suit, the Plaintiff has joined multiple causes of action arising from the unauthorized use of his personality rights by third parties, including the sale of merchandise for commercial gain, publication and circulation of disparaging and obscene memes, impersonation, and unauthorized use of the Plaintiff's attributes such as voice/name/face through morphing, superimposition, artificial intelligence, and creation of GIFs. The Plaintiff has asserted that such unauthorized acts constitute violation of his statutory and common law rights under the Copyright Act, 1957, the Trade Marks Act, 1999 and further amount to infringement of his right to privacy, goodwill, and reputation.

33. The assertions made in the plaint and submissions made by the learned senior counsel for the Plaintiff, leave no doubt that the Plaintiff is a well-known face in India who has gained immense goodwill and reputation over a course of a very successful career and has acquired a celebrity status



in India.

34. The law, as laid down in **D.M. Entertainment v. Baby Gift Others, House<sup>2</sup>, Anil Kapoor v. Simply Life India and Others<sup>3</sup>**, and **Jaikishan Kakubhai Saraf Alias Jackie Shroff v. The Peppy Store and Others<sup>4</sup>** recognizes that an individual's right to control the commercial use of his likeness and personality attributes forms part of the right of publicity. The Courts have consistently held that the unauthorized use of a person's name, image, voice, or other distinctive attributes for commercial purposes constitutes an infringement of such right, amounting to dilution of the individual's unique identity and leading to unearned commercial gain by others. It is well settled that where such personality rights are established, the individual is entitled to protection by way of injunction against their unauthorized use or exploitation.

35. Therefore, prima facie the Plaintiff's personality traits and/or parts thereof, including Plaintiff's name Hrithik Roshan, voice, image, photograph, or likeness and other attributes are protectable elements of the Plaintiff's personality rights. The Plaintiff is also entitled to protect itself against impersonation, false, obscene, morphed and distorted content created with the use of AI or otherwise, which is demeaning and lowers his reputation and goodwill.

36. In view of the above, the Plaintiff has established a prima facie case for grant of an ex-parte ad interim injunction. The balance of convenience also lies in favor of the Plaintiff and against the Defendants. This Court is of the prima facie opinion that if an injunction is not granted in favor of the

---

<sup>2</sup> MANU/DE/2043/2010

<sup>3</sup> 2023 SCC OnLine Del 6914 [Paragraph Nos. 38 to 40]



Plaintiff, irreparable loss and harm would be caused to the Plaintiff's reputation.

37. Accordingly, until the next date of hearing, following directions are hereby issued with respect to each Defendant and with specific reference to **Annexure A**, enclosed with this order: -

37.1 Defendant Nos. 1/John Doe, and infringing Defendants i.e., Defendant Nos. 2, and 8 to 12 or any one acting for or on their behalf are restrained from utilizing the Plaintiff – Hrithik Roshan's; name, likeness, image, voice, personality or any other aspects of his persona to create any merchandise, or in any other manner misuse the said attributes using technological tools such as Artificial Intelligence, deep fakes, machine learning, face morphing, GIFs either for monetary gains or otherwise to create any videos, photographs, etc., for commercial purposes, so as to result in violation of the Plaintiff's personality rights and publicity rights.

37.2 Defendant Nos. 2 is restrained from publishing any material which infringes the personality rights of the Plaintiff and is directed to take down the URL enlisted in **Annexure A**.

37.3 Defendant Nos. 3 to 7 are directed to suspend and lock the impugned domain names on which the websites enlisted in **Annexure A** are posted, and also, provide the complete details of the registrant of the said domains name including the IP addresses.

37.3.1 The registrants of the said websites are granted liberty to approach this Court and give an undertaking that they will abide by the injunction granted against the infringing Defendants and not infringe the personality

---

<sup>4</sup> 2024 SCC OnLine Del 3664



rights and publicity rights of the Plaintiff; and thereafter appropriate directions will be issued for unblocking the concerned domain name.

37.4 Defendant No. 8, 9 and 10 are directed to take down and block access to the mobile applications enlisted in **Annexure A**.

37.5 Defendant No. 11 is directed to take down the infringing URL enlisted in **Annexure A**.

37.6 Defendant no. 12 is directed to take down the infringing URLs enlisted in **Annexure A**.

37.7 Defendant Nos. 13 and 28 are directed to take down and delist the infringing links enlisted in **Annexure A**.

37.8 Defendant Nos. 29 and 30 are directed to take down the infringing links enlisted in **Annexure A**.

37.9 Defendant Nos. 31 is directed to take down the infringing URLs, enlisted in **Annexure A**. However, the URL corresponding to page 139 and 140 of the paper books will not be taken down.

37.10 Defendant No. 32 is directed to take down the infringing URLs, enlisted in **Annexure A**.

However, the URLs corresponding to social media profiles filed as document no. 26 of the paper-book will not be taken down.

So also, with respect to document no. 31, URLs only for the specific posts at pages 118, 119 and 121 are directed to be taken down by Defendant No. 32. There is no direction to take down this profile. However, if any other disparaging post is uploaded on this profile, Plaintiff will be at liberty to approach Defendant No. 32 for take down of such a post.



37.11 Defendant no. 33 is directed to take down the infringing link corresponding to document no. 39 in the paper-book, also enlisted at **Annexure A**.

38. The Plaintiff will be at liberty to approach Defendant Nos. 29 to 33 through the counsels' who have entered appearance, for taking down any further content, which is similar to the subject matter of the suit and has been actioned as per this order. Upon receiving a request, Defendant Nos. 29 to 33 after verification will act upon the said request within 48 hours. In case the said Defendants have any reservation, they will communicate the same to the Plaintiff within 48 hours, so that he can take appropriate remedial steps vis-à-vis the flagged content.

39. It is further directed that in case Defendant No. 2 to 12 fail to comply with the aforesaid directions within the time granted, Plaintiff will inform Defendant No. 31, who will then reindex the said URLs from its platform.

40. Defendant Nos. 3 to 7 are directed to provide the BSI details of the registrants to the Plaintiff within three (3) weeks. Defendant Nos. 13 to 28 are directed to provide the BSI details of the users who have listed the infringing products on their e-commerce platform to the Plaintiff within three (3) weeks. Defendant Nos. 31 and 32 will provide the Plaintiff with BSI details of the users of the URLs which have been directed to be taken down within three (3) weeks.

41. In addition, Defendant No. 32 will provide the Plaintiff with the BSI details of the user/creator of the fan profiles enlisted at document no. 26, within three (3) weeks; and the Plaintiff will be at liberty to implead the creator of the said profile so that they can be heard before any directions are passed in this matter.





42. No direction is being issued to Defendant No. 33/X with respect to URLs at document no. 41 as in the opinion of this Court there is no violation of the Plaintiff's rights. With respect to document no. 27, Defendant No. 33 is directed to provide the Plaintiff with the BSI detail of the user/creator of the fan profile and the Plaintiff will be at liberty to implead the said person, who will be heard before any directions are being issued qua the said profile.
43. The Defendants will comply with these directions within 72 hours from the receipt of this order.
44. Compliance with Order XXXIX Rule 3 of CPC be done within 10 days from today.
45. Issue notice to non-appearing Defendant Nos. 2 to 13, 16, 18 to 26, 28, 30 and 33 through all permissible modes, upon filing of process fees, returnable on the next date of hearing.
46. Let the reply to this application be filed by the infringing Defendants within a period of four (4) weeks from receipt of notice.
47. Rejoinder thereto, if any, be filed within a period of four (4) weeks thereafter.
48. List before the learned Joint Registrar (J) on **04.12.2025**.
49. List before Court on **27.03.2026**.
50. The digitally signed copy of this order, duly uploaded on the official website of the Delhi High Court, [www.delhihighcourt.nic.in](http://www.delhihighcourt.nic.in), shall be treated as a certified copy of the order for the purpose of ensuring compliance. No physical copy of order shall be insisted by any authority/entity or litigant.

**MANMEET PRITAM SINGH ARORA, J**  
**OCTOBER 15, 2025/msh/AM**



## ANNEXURE- A

S.NO.	DEFENDANTS	LINKS
<b>A. MOBILE APPLICATIONS</b>		
1.	Defendant No. 1- John Doe/Ashok Kumar and Defendant No. 8- SC Softland SRL	<ul style="list-style-type: none"><li>• <a href="https://hrithik-roshan-fan-app.soft112.com/">https://hrithik-roshan-fan-app.soft112.com/</a></li></ul>
2.	Defendant No. 1- John Doe/ Defendant No. 9- the Natevia Company	<ul style="list-style-type: none"><li>• <a href="https://hrithik-roshan.allbestapps.net/#google_vignette">https://hrithik-roshan.allbestapps.net/#google_vignette</a></li></ul>
3.	Defendant No. 1- John Doe/ Elecbyber International Pte. Ltd.	<ul style="list-style-type: none"><li>• <a href="https://apkpure.net/hrithik-roshangreetings/com.greetings.quotes.hindi.hrithikroshan#google_vignette">https://apkpure.net/hrithik-roshangreetings/com.greetings.quotes.hindi.hrithikroshan#google_vignette</a></li></ul>
4.	Defendant No. 1- John Doe/ Defendant No. 31- Google LLC	<ul style="list-style-type: none"><li>• <a href="https://play.google.com/store/apps/details?id=com.greetings.quotes.hindi.hrithikroshan&amp;hl=en_IN">https://play.google.com/store/apps/details?id=com.greetings.quotes.hindi.hrithikroshan&amp;hl=en_IN</a></li><li>• <a href="https://play.google.com/store/apps/details?id=com.ViewArtApps.Hrithikroshanphotoeditor&amp;hl=en_IN">https://play.google.com/store/apps/details?id=com.ViewArtApps.Hrithikroshanphotoeditor&amp;hl=en_IN</a></li><li>• <a href="https://play.google.com/store/apps/details?id=com.hindi.hrithikroshan.songs.videos.hrithikroshanmovies&amp;hl=en_IN">https://play.google.com/store/apps/details?id=com.hindi.hrithikroshan.songs.videos.hrithikroshanmovies&amp;hl=en_IN</a></li></ul>
<b>B. SALE OF MERCHANDISE</b>		
1.	Defendant No. 1- John Doe/Ashok Kumar/ Defendant No. 13- Alibaba.com	<ul style="list-style-type: none"><li>• <a href="https://www.alibaba.com/product-detail/India-Bollywood-Star-Hrithik-Roshan-Life_1600217059136.html">https://www.alibaba.com/product-detail/India-Bollywood-Star-Hrithik-Roshan-Life_1600217059136.html</a></li></ul>
2.	Defendant No. 1- John Doe/Ashok Kumar/ Defendant No. 16- Reliance Retail Limited	<ul style="list-style-type: none"><li>• <a href="https://www.jiomart.com/p/homeandkitchen/lanstick-vinyl-black-hrithikroshan-image-with-quotes-self-adhesive-wall-sticker-24-inch/594546120">https://www.jiomart.com/p/homeandkitchen/lanstick-vinyl-black-hrithikroshan-image-with-quotes-self-adhesive-wall-sticker-24-inch/594546120</a></li></ul>
3.	Defendant No. 1- John Doe/Ashok Kumar/ Defendant No. 18- Horntrast Digital Pvt Ltd.	<ul style="list-style-type: none"><li>• <a href="https://froheyo.com/products/hrithik-roshan-bold-style-bollywoodposter?srltid=AfmBOoricCP2ZmCiVCdtUE2WhouKcJAR0gBEBTme7I4WYMTX447sFq9">https://froheyo.com/products/hrithik-roshan-bold-style-bollywoodposter?srltid=AfmBOoricCP2ZmCiVCdtUE2WhouKcJAR0gBEBTme7I4WYMTX447sFq9</a></li></ul>



4.	Defendant No. 1- John Doe/Ashok Kumar/ Defendant No. 19- Print Ecommerce Solutions Private Limited	<ul style="list-style-type: none"><li>• <a href="https://print-on-click.in/hrithik-roshan-poster">https://print-on-click.in/hrithik-roshan-poster</a></li></ul>
5.	Defendant No. 1- John Doe/Ashok Kumar/ Defendant 20- Nyaa Retail Private Limited	<ul style="list-style-type: none"><li>• <a href="https://www.postergully.com/collections/all/products/inspiration-quoteshrithik-roshan-square-art-prints-artist-vishal-keswani">https://www.postergully.com/collections/all/products/inspiration-quoteshrithik-roshan-square-art-prints-artist-vishal-keswani</a></li></ul>
6.	Defendant No. 1- John Doe/Ashok Kumar/ Defendant No. 21- Thunder Buddy Enterprise Private Limited	<ul style="list-style-type: none"><li>• <a href="https://thunderbuddy.in/products/hrithik-roshan-face-pillow-minime?_pos=1&amp;_psq=hrit&amp;_ss=e&amp;_v=1.0">https://thunderbuddy.in/products/hrithik-roshan-face-pillow-minime?_pos=1&amp;_psq=hrit&amp;_ss=e&amp;_v=1.0</a></li></ul>
7.	Defendant No. 1- John Doe/Ashok Kumar/ Defendant No. 22- Funky Tradition	<ul style="list-style-type: none"><li>• <a href="https://funkytradition.com/products/hrithik-roshan-war-movie-stylish-sunglasses-for-men-funkytradition">https://funkytradition.com/products/hrithik-roshan-war-movie-stylish-sunglasses-for-men-funkytradition</a></li></ul>
8.	Defendant No. 1- John Doe/Ashok Kumar/ Defendant No. 23- Shark Shirts	<ul style="list-style-type: none"><li>• <a href="https://sharkshirts.in/apparel/hrithik-roshan-t-shirt-2/?srsltid=AfmBOorrh6g6P4mShcUnUyy6md_ekSKfI2j73k4MaeCqRJJoKYEOP3EpX">https://sharkshirts.in/apparel/hrithik-roshan-t-shirt-2/?srsltid=AfmBOorrh6g6P4mShcUnUyy6md_ekSKfI2j73k4MaeCqRJJoKYEOP3EpX</a></li></ul>
9.	Defendant No. 1- John Doe/Ashok Kumar/ Defendant No. 24- Celebrity Poster Prints	<ul style="list-style-type: none"><li>• <a href="https://celebrity-poster-prints.com/hrithik-roshan-m319-bollywood-autographed-poster-print-photo-signature-gift/?srsltid=AfmBOopFKlCr6iWLxjSDij5x8wR4xRzPOLSkDGtDP6J8Cm177WCbKFck">https://celebrity-poster-prints.com/hrithik-roshan-m319-bollywood-autographed-poster-print-photo-signature-gift/?srsltid=AfmBOopFKlCr6iWLxjSDij5x8wR4xRzPOLSkDGtDP6J8Cm177WCbKFck</a></li></ul>
10.	Defendant No. 1- John Doe/Ashok Kumar/ Defendant No. 25- VIP Cut Outs	<ul style="list-style-type: none"><li>• <a href="https://www.vipcutouts.com/vip-cutouts/view-all-a-z/product/6073-hrithik-roshancutout">https://www.vipcutouts.com/vip-cutouts/view-all-a-z/product/6073-hrithik-roshancutout</a></li></ul>
11.	Defendant No. 1- John Doe/Ashok Kumar/ Defendant No. 26- Celebrity Cutouts	<ul style="list-style-type: none"><li>• <a href="https://www.celebrity-cutouts.com/product/hrithik-roshan-denim-cardboard-cutout">https://www.celebrity-cutouts.com/product/hrithik-roshan-denim-cardboard-cutout</a></li></ul>
12.	Defendant No. 1- John Doe/Ashok Kumar/ Defendant No. 28- Etsy, Inc	<ul style="list-style-type: none"><li>• <a href="https://www.etsy.com/uk/market/hrithik_roshan_poster?ref=lp_queries_external_to_p-8;">https://www.etsy.com/uk/market/hrithik_roshan_poster?ref=lp_queries_external_to_p-8;</a></li></ul>



		<ul style="list-style-type: none"><li>• <a href="https://www.etsy.com/market/hrithik_roshan_mug">https://www.etsy.com/market/hrithik_roshan_mug</a></li></ul>
13.	Defendant No. 1- John Doe/Ashok Kumar/ Defendant No. 32- Meta Platforms, Inc	<ul style="list-style-type: none"><li>• <a href="https://www.facebook.com/HrithiksEmpire/posts/if-you-could-get-your-hands-on-these-hrithik-roshan-action-figures-collectibles-/1209321783897608/">https://www.facebook.com/HrithiksEmpire/posts/if-you-could-get-your-hands-on-these-hrithik-roshan-action-figures-collectibles-/1209321783897608/</a></li></ul>
<b>C. THROUGH SPREADING FALSE AND FABRICATED NEWS</b>		
1.	Defendant No. 11- Ribbon Ballons	<ul style="list-style-type: none"><li>• <a href="https://ribbonballoons.godaddysites.com/our-team">https://ribbonballoons.godaddysites.com/our-team</a></li></ul>
2.	Defendant No. 1- John Doe/Ashok Kumar/ Defendant No. 33- “X”	<ul style="list-style-type: none"><li>• <a href="https://x.com/umairsandu/status/1960873441818763350?s=46&amp;t=xK1Z-kJ0u5a2Fdq649sqpA">https://x.com/umairsandu/status/1960873441818763350?s=46&amp;t=xK1Z-kJ0u5a2Fdq649sqpA</a></li></ul>
<b>D. THROUGH MORPHING, SUPERIMPOSITION, OBSCENITY MEMES AND ILLEGAL USE OF ARTIFICIAL INTELLIGENCE (AI)</b>		
1.	Defendant No. 1- John Doe/Ashok Kumar/ Defendant No. 31- Google LLC	<ul style="list-style-type: none"><li>• <a href="https://www.youtube.com/shorts/GynYH0Hf8Bs">https://www.youtube.com/shorts/GynYH0Hf8Bs</a></li><li>• <a href="https://www.youtube.com/shorts/SQziCusmMI">https://www.youtube.com/shorts/SQziCusmMI</a></li><li>• <a href="https://www.youtube.com/watch?v=8p5v1HKgTOE">https://www.youtube.com/watch?v=8p5v1HKgTOE</a></li><li>• <a href="https://www.youtube.com/shorts/-D1slA32luw">https://www.youtube.com/shorts/-D1slA32luw</a></li><li>• <a href="https://www.youtube.com/shorts/2UhOaCuR1Oo">https://www.youtube.com/shorts/2UhOaCuR1Oo</a></li></ul>



		<a href="https://www.youtube.com/playlist?list=PLEYeC7MjRVt86SDZ_ve_LJdL6lmyHvYqs">https://www.youtube.com/playlist?list=PLEYeC7MjRVt86SDZ_ve_LJdL6lmyHvYqs</a>
2.	Defendant No. 1- John Doe/Ashok Kumar/ Defendant No. 32 Meta Platforms, Inc.	<ul style="list-style-type: none"><li>• <a href="https://www.instagram.com/reel/DNF2eJQTlQ4/?igsh=MWl6bTJ0a2o4aTc3bg==">https://www.instagram.com/reel/DNF2eJQTlQ4/?igsh=MWl6bTJ0a2o4aTc3bg==</a></li><li>• <a href="https://www.instagram.com/reel/DLuV23FzEZi/?igsh=MWdsdGpuOXh6anpkeA==">https://www.instagram.com/reel/DLuV23FzEZi/?igsh=MWdsdGpuOXh6anpkeA==</a></li><li>• <a href="https://www.instagram.com/reel/DLJlqHvTU9U/?utm_source=ig_web_copy_link&amp;igsh=MWcxYjZ5aDNsa3ViMQ%3D%3D">https://www.instagram.com/reel/DLJlqHvTU9U/?utm_source=ig_web_copy_link&amp;igsh=MWcxYjZ5aDNsa3ViMQ%3D%3D</a></li><li>• <a href="https://www.instagram.com/reel/DM28xLYz5cM/?utm_source=ig_web_copy_link&amp;igsh=aGNjcnJ4M3gwYzQ%3D">https://www.instagram.com/reel/DM28xLYz5cM/?utm_source=ig_web_copy_link&amp;igsh=aGNjcnJ4M3gwYzQ%3D</a></li><li>• <a href="https://www.instagram.com/reel/DNm3-TlzFNJ/?igsh=MWI4Njdrb2Y3djB3Yg==">https://www.instagram.com/reel/DNm3-TlzFNJ/?igsh=MWI4Njdrb2Y3djB3Yg==</a></li></ul>
<b>E. THROUGH USAGE OF PLAINTIFF'S ATTRIBUTES</b>		
1.	Defendant No. 2- Jammable Limited	• <a href="https://www.jammable.com/hrithik-roshan-YpTJG">https://www.jammable.com/hrithik-roshan-YpTJG</a>
2.	Defendant No. 3- Perfect Privacy LLP	• <a href="https://wallpapercave.com/war-hritik-roshan-wallpapers">https://wallpapercave.com/war-hritik-roshan-wallpapers</a>
3.	Defendant No. 4- Markmonitor Inc	• <a href="https://allmemetemplates.wordpress.com/2020/03/01/hrithik-roshan-memetemplates/">https://allmemetemplates.wordpress.com/2020/03/01/hrithik-roshan-memetemplates/</a>
4.	Defendant No. 5- Name Cheap, Inc	<ul style="list-style-type: none"><li>• <a href="https://www.talkie-ai.com/chat/hrithik%2C-roshan-126840659435709">https://www.talkie-ai.com/chat/hrithik%2C-roshan-126840659435709</a></li><li>• <a href="https://voice123.com/voice-actor/ritikr731">https://voice123.com/voice-actor/ritikr731</a></li><li>• <a href="https://beta.opedia.ai/u/hrithik-roshan/">https://beta.opedia.ai/u/hrithik-roshan/</a></li></ul>
5.	Defendant No. 6- Godaddy India Web Services Private Limited	<ul style="list-style-type: none"><li>• <a href="https://lmaoai.app/dashboard/start-call/hrithik-roshan">https://lmaoai.app/dashboard/start-call/hrithik-roshan</a></li><li>• <a href="https://www.statusvideo.co.in/hrithik-roshan-whatsapp-status-video/">https://www.statusvideo.co.in/hrithik-roshan-whatsapp-status-video/</a></li></ul>



6.	Defendant No. 7- Cloudflare Inc	<ul style="list-style-type: none"><li>• <a href="https://pics.craiyn.com/2023-10-10/d149e133ed924cd8ae0f71ad1445cf43.webp">https://pics.craiyn.com/2023-10-10/d149e133ed924cd8ae0f71ad1445cf43.webp</a></li><li>• <a href="https://www.craiyn.com/en/image/0y-QbBUmQueyggKPTnxGQ">https://www.craiyn.com/en/image/0y-QbBUmQueyggKPTnxGQ</a></li><li>• <a href="https://theresanaiforthat.com/s/hrithik+roshan+voice/">https://theresanaiforthat.com/s/hrithik+roshan+voice/</a></li><li>• <a href="https://neural.love/ai-art-generator/1edc0f0a-e9ce-66aa-aba2-99e4c0a77c84/hrithik-roshan">https://neural.love/ai-art-generator/1edc0f0a-e9ce-66aa-aba2-99e4c0a77c84/hrithik-roshan</a></li></ul>
7.	Defendant No. 31- Google LLC	<ul style="list-style-type: none"><li>• <a href="https://www.youtube.com/shorts/Mla5VFYVhDc?app=desktop&amp;si=Tv6PD5IEBkd7jXoq">https://www.youtube.com/shorts/Mla5VFYVhDc?app=desktop&amp;si=Tv6PD5IEBkd7jXoq</a></li><li>• <a href="https://www.youtube.com/watch?v=zFM_D58I5ow">https://www.youtube.com/watch?v=zFM_D58I5ow</a></li></ul>