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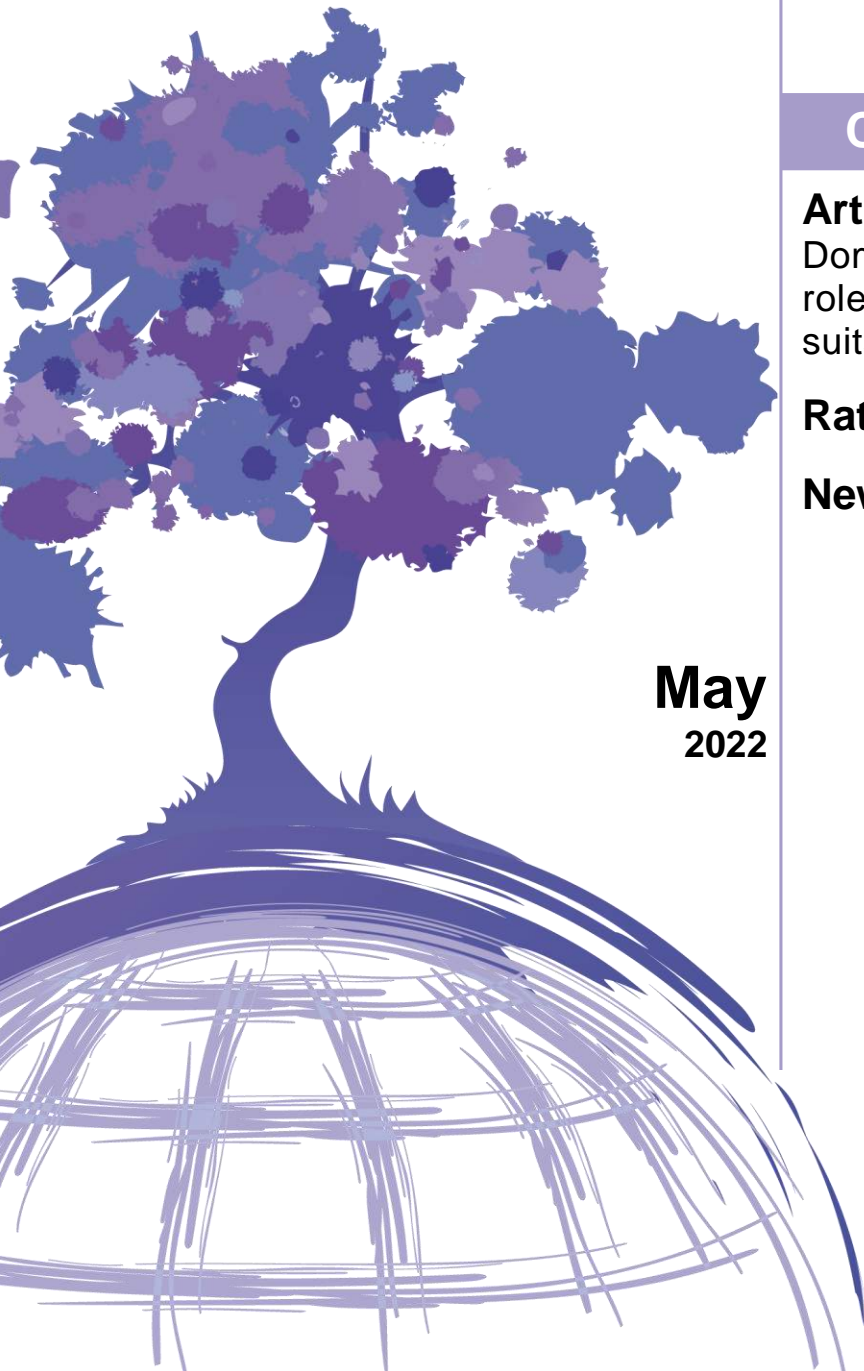
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Articles

Domain Name Registrars and their role in domain name infringement suits

By **Godhuli Nanda and Vaishali Joshi**

Introduction

In the recent case of *Snapdeal Pvt. Ltd. v. Godaddy. Com LLC and Ors*¹ a Single Judge of the Delhi High Court by an Order dated 18 April 2022, while deciding the interim application, explored different provisions of the Trademarks Act, 1999 ('**TM Act**') and the Information Technology Act, 2000 ('**IT Act**') in order to determine whether Domain Name Registrars ('**DNRs**', '**Defendants**') can be categorised as alleged infringers, by virtue of them offering, for registration, domain names that were similar to the Snapdeal's ('**Plaintiff**') registered trademarks.

The Plaintiff had filed a suit along with an interim application, seeking a *quia timet* injunction and temporary injunction against the DNRs, to restrain them from registering domain names that are deceptively similar to that of the Plaintiff's. The Plaintiff argued that due to the fast-paced and dynamic nature of the internet, suing every individual infringer who registers an infringing domain name was highly impractical. Therefore, a futuristic blanket order was essential to safeguard the exclusive rights of the Plaintiff. The Defendants, on the other hand, objected to such categorisation. It was argued that under the IT Act, the Defendants are mere intermediaries that provide a platform for registration. They are, therefore, protected by the safe harbour provided under Section 79 of the IT Act. The real

infringers, as per the Defendants, are the registrants who sought registration of a domain name that is deceptively similar to that of the Plaintiff's.

The Court dealt with the matter in-depth and analysed the TM Act and the IT Act to ascertain whether Defendants could be categorised as 'intermediaries' under the law, and if so, whether they could claim the protection provided under Section 79 of the IT Act.

Summary of the case

The Plaintiff was the registered proprietor of the SNAPDEAL marks and had been using the same since 2010. The prolonged use of the said trademark enabled the Plaintiff to establish goodwill and reputation in the said marks.

Subsequently, several third parties were seen registering deceptively similar domain names which included the thread/word 'SNAPDEAL', with the alleged ulterior motive of riding on the goodwill and well-established reputation of the Plaintiff. The Plaintiff claimed that the Defendants were enabling such registrations and therefore facilitating the infringement of its trademarks. This enablement thus rendered the Defendants as infringers under Sections 28 and 29 of the TM Act.

The Defendants opposed the allegations of being involved in any type of trademark infringement, as Defendants were mere intermediaries that provided a platform for

¹ 2022 SCC OnLine Del 1092.

registering domain names and thus protected under Section 79 of the IT Act.

The Court in this detailed order refused to grant the prayer of the Plaintiff seeking issuance of an omnibus order restraining the Defendants from offering domain names containing the word 'SNAPDEAL'. Yet, the Court held that the Defendants will not be granted the 'safe harbour' protection under Section 79 of the IT Act if they continue to provide alternate domain names, for commercial profits, which infringe the registered trademarks.

Detailed observation of the Court on the issues identified:

i) on whether the Defendants are 'intermediaries'

The Court provided a clear and elaborate interpretation of the word 'intermediaries' under the IT Act and examined the phrase 'with respect to' as used in the definition of intermediaries and concluded that the same required a wide and compendious interpretation. It was concluded that the scope and ambit of the term 'electronic records' used in the definition of intermediaries would include the service of providing electronic records for utilization by aspirant registrants. Domain names, especially those provided by intermediaries, were accordingly categorised as electronic records under Section 2(1)(t) of the IT Act, thus making the Defendants intermediaries under the same.

ii) on providing brokerage services by the Defendants

The Court agreed with the Defendants that there was no statutory proscription against providing brokerage services by the Defendants. However, the benefit of 'safe harbour' under Section 79 of the IT Act will not extend to such services.

iii) on providing domain names containing 'SNAPDEAL'

The Court noted that the Defendants act commercially for profit when they provide alternative domain names for a price. Thus, by providing domain names and by offering registration of the SNAPDEAL thread at a higher price, the Defendants were enabling infringement and causing a violation of the Plaintiff's rights under Sections 28 and 29 of the TM Act.

iv) on 'safe harbour' under Section 79 of the IT Act

The Court observed that if the services provided by the intermediary are in excess of those which are offered in the natural course, like offering alternative options in the present case, they cannot be entitled to the benefit of 'safe harbour' Section 79(1) of the IT Act.

v) on technological limitation for the Defendants to limit certain domain names containing thread or word from offering to aspiring registrants

The Court refused to accept the contention of the Defendants that the process of providing domain names was automated and could not be vouchsafed to ensure alternative options which did not infringe any mark. The fact that the Defendants did not offer any alternative option to its own trademark 'GoDaddy' indicated that modulating the algorithm was possible. The Court directed that either the algorithm to offer alternative domain names was to be modified or the Defendants will have to stop offering such options.

vi) on restraining DNRs from providing, in future, to any aspiring registrant, any domain name containing 'SNAPDEAL' as a *quia timet* relief.

The Court was of the view that it was against the principle of justice to hold that every

alternative domain name containing the word 'SNAPDEAL' was infringing in nature and therefore was impermissible. However, such an order can only be considered as a remedy when the Plaintiff is aware that the an individual/entity is likely to launch an infringing product.

Analysis

The Plaintiff in the present case argued in favour of a blanket order to stop the never-ending struggle of trademarks owners *vis-à-vis* individuals infringing their marks by using similar marks to fraudulently ride the goodwill associated with such marks. The proposed solution by the Plaintiff was to get a preventative temporary injunction against the fraudulent registration of any domain names by any individual/entity which incorporated its registered trademarks.

One of the reasons behind the Plaintiff's prayer for an omnibus order could be the very availability of domain name suggestions similar/identical to registered trademarks which in turn tempts registrants to buy the same in order to, directly or indirectly, increase the visibility of their business in the global space and capture a wider audience. Further, due to the vast and fluid nature of the internet, it is difficult to keep an eye on the hundreds and thousands of websites that come up every day. As a result, protection of one's intellectual property can become difficult.

However, the Court rejected the Plaintiff's prayer for a preventative temporary injunction. The Court's decision regarding the Plaintiff's said rejected prayer stems from the logic that when it comes to trademark infringement, every case

needs to be analysed separately. Therefore, a blanket order against any future registrations containing the SNAPDEAL thread/mark did not seem justified in the interests of justice.

Further, the Court while declaring Defendants to be intermediaries, also pointed out that in case the algorithm devised by the Defendants suggest alternate domain names which infringe registered trademarks, the Defendants will not be able to take the defence of safe harbour. However, no staunch technique or system was provided by the Court as to how to provide the alternate domain names which will not infringe any registered trademark since there would be countless such hits generated by the algorithm.

Due to the outcome of this case, the debate in the contemporary legal world regarding the tussle between punitive and preventive law concerning Defendants remains unresolved. The Order of the Court leaves a huge gap between its direction and the possible execution of said direction. In such a situation, the legislation imposing a statutory duty on the Defendants to make such modulations can be a viable path. Further, the Defendants in the process to keep themselves away from the radar of the legislation can also be directed to self-regulate themselves and make such modulations or create a profile for an ombudsman to resolve such issues.

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Ratio decidendi

Copyrights – Mere similarities will not come under the purview of copyright

The Kerala High Court has held that mere similarities will not come under the purview of copyright unless it satisfies the various clauses incorporated in Section 14 of the Copyrights Act, 1957. The Court, in this regard, also reiterated that when something is incorporated as a new version or a new idea apart from the general idea, subject matter, themes, plot etc., the user of the newly invented or incorporated idea alone would be capable of bringing the matter within the purview of violation of copyright.

The High Court cited the proposition laid down by the Supreme Court in the case of *R.G. Anand v. Delux Films*, that there cannot be any copyright in an idea, subject matter, themes, plots, or historical or legendary facts. The Apex Court had made it clear that when an idea was originated or developed from a source being common, similarities are bound to occur, and unless the fundamental or substantial aspects of the mode of expression adopted in the copyrighted work, the same cannot be brought under the purview of violation.

The High Court was adjudicating a dispute between two channels over the programmes wherein, the Appellant's show was an eminent one that aired first in 2015. However, in 2021, the Respondent had aired four episodes with the very same cast and roles with the same theme.

Maintaining the order passed by the Trial Court and directing it to expedite the trial, the High Court held that mere employment of very same actors in a different atmosphere, though it is pertaining to the day-to-day life of a family may not by itself bring the matter within the purview of

the copyright as defined under Section 14, especially when one was dealing with a Hindu family and the other one was dealing with a Christian Anglo-Indian family.

The High Court was of the view that copyright does not mean that it is not permissible to adopt the very same theme or plot or idea or subject matter by others unless the same is having an individual nature of its own with the employment of an invention made by the creator apart from the generality of the idea, theme or plot and its natural sequences.

It held that however, if there is any invention is employed by the author or the person who claims copyright and if it is adopted substantially, it would attract clause (vi) of Section 14(a), for which there should be special pleading in the plaint with respect to those portions with the grievance. The Court observed that there were no such pleadings in the case before it. [*Suryansh Broadcasting Pvt. Ltd. v. Zee Entertainment Enterprises Ltd.* – Judgement dated 29 March 2022 in FAO No. 9 of 2022, Kerala High Court]

Trademarks – Phonetic identity is an important index of similarity; Tests of phonetic, visual, and structural similarity are disjunctive

The Delhi High Court, while dealing with a suit for a permanent injunction, has observed that a phonetic identity or similarity is an important index of similarity or deceptive similarity of one mark against the other competing mark. It has also reiterated that the tests of phonetic, visual, and structural similarity or identity are disjunctive and not conjunctive.

The Court held that the Plaintiff's registered mark 'ISITE', when compared with the Defendant's mark 'EYESITE', left no doubt that they were phonetically identical and visually similar. It observed that when both the words are articulated, an ordinary prudent man would be unable to distinguish them by their sounds and there would be likelihood of deception and confusion on account of their phonetic identity.

Though the Court noted that the trademark of the Plaintiff had a prefix 'I' to the word 'SITE', while that of the Defendant had a prefix 'EYE' and a critical comparison of the two marks may disclose some difference, it was of the view that likelihood of confusion and deception on account of phonetic identity and overall similarity of the two marks, when taken as a whole, cannot be ruled out. It also noted that the test was of phonetic similarity and not identity.

The High Court in this regard also observed that not only were the marks phonetically similar, there was similarity in products, i.e. health supplements as well as identity of trade channels and customer base and, therefore, the triple identity test, was satisfied.

Further, the High Court also noted that courts have repeatedly affirmed a lower threshold for determining confusion in case of over-the-counter (OTC) medicinal products.

It may be noted that decreeing the suit partly in favour of the Plaintiff, the Court took note of the following principles as reiterated by various courts:

- (i) Competing marks must be seen as a whole.
- (ii) Marks are not to be kept side by side for comparison and are not to be dissected or compared syllable by syllable.
- (iii) If the marks are visually and/or phonetically identical or similar,

confusion/deception is likely to occur; and

- (iv) Public interest supports the lesser degree of proof showing confusing similarity in the case of trademarks in respect of medicinal and pharmaceutical products.

The Court also found it evident from the documents on record that the word 'ISITE' was coined by the Plaintiff in 1997 and that the adoption by the Defendant of part of the mark in an identical manner showed the intent to misrepresent and pass off the goods as that of the Plaintiff by riding on their goodwill and reputation. [*Sun Pharmaceutical Industries Ltd. v. Kinetic Lifescience (OPC) P. Ltd.* – Judgement dated 12 April 2022 in CS (COMM) 241/2021, Delhi High Court]

Patents revocation application – No limitation is prescribed – Limitation under the Limitation Act, 1963 is not applicable

Observing that there is no limitation prescribed either in the Patents Act or under the Patents Rules, for the purpose of revocation under Section 64 of the Patents Act, 1970, the Delhi High Court has reiterated that a limitation period cannot be read into the provision. Noting that as per the provisions, the 'person interested' would be permitted to seek revocation on any of the grounds mentioned in Section 64, so long as such a person is in some way 'interested', the Court held that the said interest in the patent could arise at any point of time till the term of the patent expires.

The Court was of the view that to read Article 137 of the Limitation Act, 1963 into the Section 64 of the Patents Act, would be in effect be rewriting the said provision, which would not be permissible by judicial interpretation. It also noted

that a 'person interested' can file a counter claim under Section 64 seeking revocation, which shows that the trigger for the filing of the counter claim may not arise until and unless the suit itself is filed, and thus the limitation of three years cannot be read into the period for filing the revocation petition.

Distinguishing the Calcutta High Court's decision in the case of *Bayer AG v. Controller of Patents* [AIR 1982 Cal 30], the Court also observed that as per Supreme Court's decision in the case of *Ajaib Singh v. The Sirhind CoOperative Marketing Cum-Processing Service Society Limited and Ors.* [AIR 1999 SC 1351], when a provision does not prescribe a limitation period, the same cannot be read into the statute. [*Dr. Reddys Laboratories Limited v. Controller of Patents* – Order dated 12 April 2022 in C.O.(COMM.IPD-PAT) 3/2021, Delhi High Court]

Designs – Reliance on print-outs from e-commerce website to prove prior publication – Mere speculation that images could have been changed later, not material

In a case involving challenge, by the Defendant, to the validity of the designs registered by the Plaintiff claiming that no novelty resided in the said designs, the Delhi High Court has vacated its earlier interim order against the Defendant. The Defendant had relied upon various print-outs from the website of a major e-commerce entity to argue that the products of these very designs were available prior to the date of registration by the Plaintiff. The Court was of the *prima facie* view that the product designs were prior published and hence were not novel.

Holding in favour of the Defendant, the Court rejected the Plaintiff's contention that the printouts could not be relied upon, in as much as these images are not constant and can be changed by the seller at any point of time. The

Court noted that while the sellers may be having the permission and the liberty to change designs on the amazon platform, unless and until the Plaintiff showed, *qua* at least one design, that there was in fact an alteration of the image, there was no reason to accept the Plaintiff's submission. The High Court was of the view that the mere fact of the availability of the said feature (for alteration of images) should not lead the Court to presume in favour of the Plaintiff that the images have been altered. It held that mere speculation that images could be changed cannot persuade the Court to ignore the series of printouts placed on record. It, in this regard, also noted that few of the print-outs were related to the Plaintiff itself. [*Dream Care Furnishings Pvt. Ltd. v. Meena Enterprises* – Order dated 11 April 2022 in CS (COMM) 184/2021, Delhi High Court]

Trademarks – Use of mark in Ads Program prima facie amounts to infringement and passing off – High Court notes that the search engine was encashing goodwill of the trade mark owner

The Delhi High Court has reiterated that the use of the Plaintiff's registered mark 'MakeMyTrip' on the Google Ads Program as a keyword by one of its major competitors would *prima facie* amount to trademark infringement under Sections 2(2)(b), 29(4)(c), 29(6)(d), 29(7) and 29(8)(a) of the Trade Marks Act, 1999. Considering the nature of use of a trademark as a keyword on the Google Ads Program, the Court was of the view that encashment of the goodwill and reputation of a registered trade mark by third parties by bidding on it as a keyword would amount to infringement and passing off.

The Hon'ble High Court in this regard also rejected the contention that the mark 'MakeMyTrip' was not reflected either in the Ad title, metatags or in the Ad text and that the hidden use cannot be infringement. It observed

that the mark being used in a hidden manner does not take away the fact that it is, in fact, 'use' of the mark as defined under Section 2(2)(b). It also noted that there is not much of a difference in the use of a mark in a metatag or a source code of a website which is not visible and in use of a mark as a keyword by the Google Ads Program.

The Court also held that use of the Plaintiff's mark by the Defendant as a keyword on the Google Ads Program was use for the purpose of 'advertising' and that the practice amounted to taking unfair advantage of the Plaintiff's mark.

Further, the Court observed that the concept of 'deceit' which forms the fulcrum of an action for passing off was there in the present case and that the invisible use of a mark as a keyword can constitute passing off as a matter of principle.

Interestingly, the Hon'ble High Court also noted that Google was encashing the goodwill of the trade mark owner by allowing the competitor to book the said mark as a keyword.

It may however be noted that though the Defendant was restrained from using the mark 'MakeMyTrip' together/ in conjunction, with or without spaces as a keyword on the Google Ads Program, use of the words 'make', 'my', 'trip' not conjunctively on a standalone basis in a descriptive or generic sense, was not restricted. The Court also restricted the interim injunction to the territory of India. [*MakeMyTrip India Private Limited v. Booking.com B. V.* – Decision dated 27 April 2022 in CS (COMM) 268/2022, Delhi High Court]




News Nuggets

'LIMCEE' and 'LICMEE' are almost identical to each other – Defendant directed to pay litigation cost

The Delhi High Court has observed that the mark 'LIMCEE' of the Plaintiff and 'LICMEE' of the Defendant are almost identical to each other and there is deceptive, ocular and phonetic similarity between the two marks. Noting that the Defendants' packaging was also an imitation of the Plaintiff's packaging, the High Court also observed that there was no justification from the Defendants to use an identical mark and an identical packaging so as to deceive chemists, consumers and patients at large. Further, considering the total value of the product which has been sold, the

Court in *Abbott Healthcare Private Limited v. Glensmith Labs Pvt. Ltd.* [Judgement dated 18 April 2022] directed the payment of INR 1.5 lakh by the Defendant to the Plaintiff, as litigation costs.

Arcuate stitching design on Levi's jeans is a 'well known mark'

The Delhi High Court has opined that the 'Arcuate Stitching Design' mark  (stitching pattern incorporated on Plaintiff's jeans products) has become 'well known' to the public which uses garments carrying the said mark. The Court was of the view that considering the long period of 150 years, during which the 'Arcuate Stitching Design' mark

was being used for Levi's jeans, trousers, pants and other garments, the said mark has achieved the status of a 'well-known mark'. It also held that the mark is an extremely distinctive mark which has acquired secondary meaning due to extensive use. The Delhi High Court in *Levi Strauss and Co. v. Imperial Online Services Private Limited* took note of the decision of the US District Court for the Southern District of New York in the case of *Lois Sportswear, USA, Inc. v. Levi Strauss & Co.* [631 F. Supp.735 (S.D.N.Y. 1985)]. It also noted that while affirming this decision the United States Court of Appeals, Second Circuit had noted and acknowledged the global reputation in the 'Arcuate Stitching Design' mark.

Confusion between the marks 'Blue Heaven' and 'Marc Heaven'

The Delhi High Court has held that even the appropriation of the word 'Heaven', which is the dominant and prominent feature of the Petitioner's mark 'Blue Heaven', can constitute infringement by the Defendant using the mark 'Marc Heaven'. It observed that the use of the word 'Heaven' and blue colour in the Defendant's mark for identical goods showed that there was dishonesty in adoption of the mark 'Marc Heaven' itself. It also noted that the Petitioner was the prior user and that the Defendant itself, while seeking rectification/cancellation of the petitioner's mark, had categorically stated that the two marks were identical/deceptively similar. The High Court in *Blue Heaven Cosmetics Private Limited v. Deepak Arora* [Decision dated 6 April 2022] also noted that though the words 'Blue' and 'Heaven' are dictionary words, the adoption of both the words in combination and otherwise, was a completely arbitrary adoption in respect of cosmetics and thus the mark 'Blue Heaven' was an inherently distinctive mark.

Trademarks – Nominative fair use is permissible

The Delhi High Court has reiterated that nominative fair use is permissible in so far as the use is such that it does not depict sponsorship by the trademark owner and the use is 'reasonably necessary'. The suit was accordingly decreed to the effect that a permanent injunction shall operate against the Defendants against use of the mark 'GeM' [Government e-Marketplace] or the 'GeM' logo, either as part of a domain name or extension on their URL or as a mark or name in a manner so as to create confusion/deception in the mind of the public that they are affiliated with, sponsored by or connected to the Plaintiff. The Court in *Government e Marketplace v. Unilex Consultants* [Decision dated 18 April 2022] was however of the view that the injunction would not prevent the said Defendants from using the term 'GeM' to refer to the Plaintiff and to refer to the services the Defendants are providing with respect to the Plaintiff's GeM portal, as a means of information to the general public in a descriptive manner.

No patent for method for preparation of tablet comprising Tofogliflozin from powder mixture by direct compression

The Delhi High Court has dismissed an appeal against non-grant of a patent for invention specifically providing a method for preparation of a tablet comprising Tofogliflozin from the powder mixture by direct compression. The Appellant had submitted that its invention provided a tablet comprising Tofogliflozin with improved disintegration and dissolution properties as compared to the conventional

production methods and was hence entitled to grant of a patent. Observing that the

compound Tofogliflozin, including its tablet form was clearly covered in the three patents cited in the first examination report as prior arts, the Court in the case *Chugai Seiyaku Kabushiki Kaisha v. Controller of Patents and Design* [Order dated 6 April 2022 as corrected and released on 13 April 2022] opined that the

mere process of preparing the tablet comprising Tofogliflozin by using a specific API ratio and lubricant ratio cannot result in a separate patent being granted for the method/process. It also noted that the comparative data did not qualify as significant enhancement of therapeutic efficacy.

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