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An e-newsletter from
Lakshmikumaran & Sridharan, India

August 2021 / Issue-119

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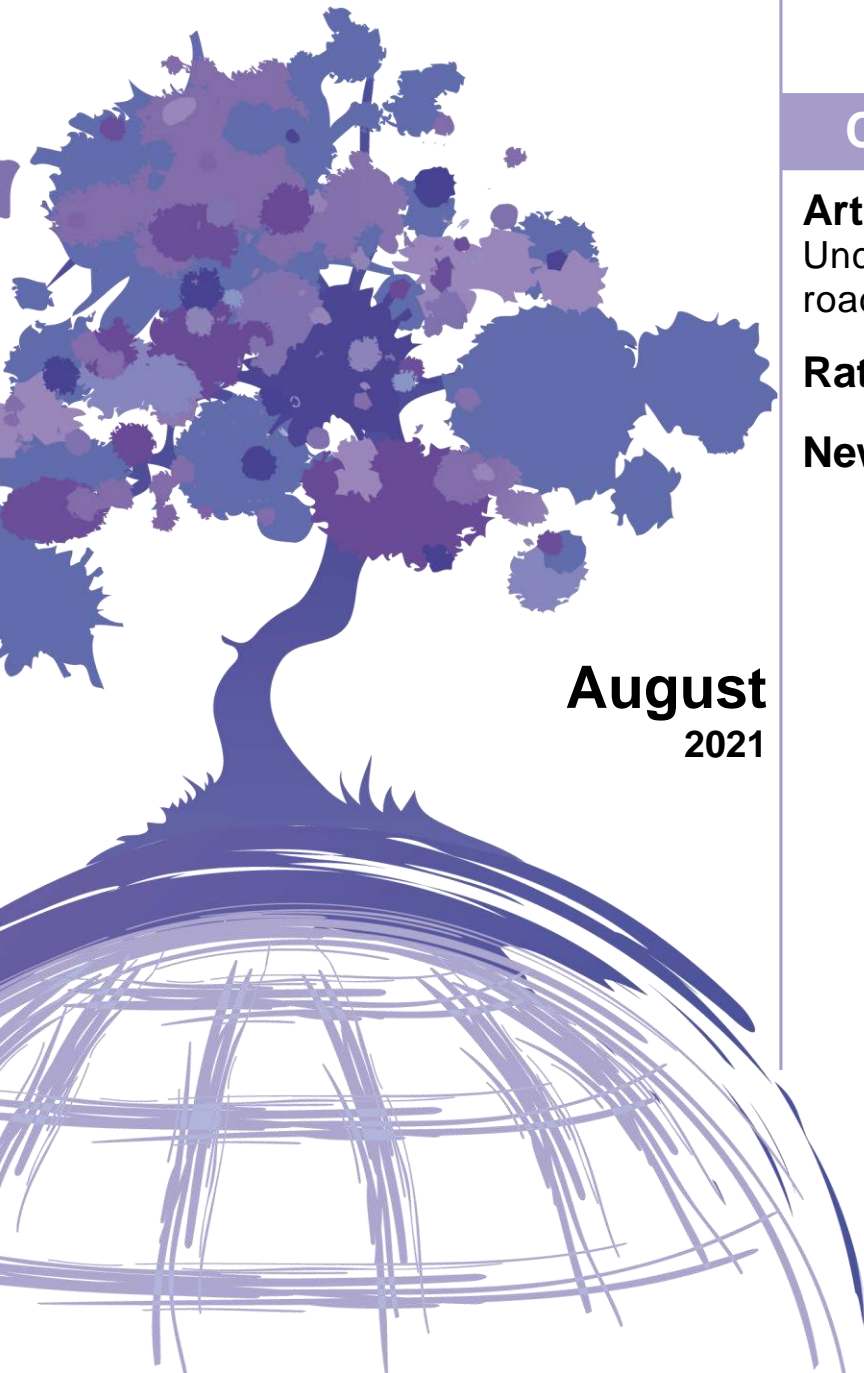
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August
2021



August 2021 issue of L&S IPR Amicus is our **10th Anniversary issue**. Through this newsletter, we at Lakshmikumaran and Sridharan Attorneys share our knowledge and experience in a broad array of intellectual property (IP) laws covering patents, trademark, copyright, geographical indications, designs, plant variety, etc.

It brings me great pleasure to commemorate the 10-year journey of this knowledge base. I take this opportunity to thank our professionals whose regular contributions have made this achievement possible. Most importantly, I am grateful for the pleasure of serving our growing number of readers and thank you, for your support and patronage. With a decade gone by, I look to the one ahead, with even more zeal and enthusiasm, to continue this unwavering commitment to knowledge sharing.

V. Lakshmikumaran

It gives me a great satisfaction to announce that L&S IPR Amicus has served the industry as well as professionals for ten long years now, attempting to bring the law in its simplest form to all our readers, including our clients and attorneys, who are a part of the L&S family.

I am hopeful that the newsletter has managed to bridge the gap between the plain text of law and its implementation by practicing minds. Dedicating resources and running the press on a continuous basis was no easy task for us. Nevertheless, we propose to bring out more changes going forward, so that it can be more reader friendly and expansive in its approach. We would be more than happy to receive any suggestions/ feedback on the same.

L. Badri Narayanan





Article

Unconventional trademarks: A roadmap to the future

By **Raghav Sarda and Sidharth Shahi**

With an increase in the trend of companies and individuals desiring to create a unique identity for themselves, unconventional or non-traditional trademarks have gained prominence in the past couple of years. In past, registering an unconventional trademark was never thought of and was considered unachievable as the Trade Marks authority of India had a regressive approach in handling an application for such trademarks. However, the Trade Marks Act, 1999 ('Act') introduced certain statutory provisions to accommodate filing of such unconventional trademarks.

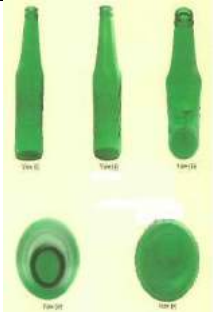
Although various types of unconventional trademarks, such as colour, sound, shape of goods, smell, motion taste, touch/texture, and hologram marks are recognized in foreign jurisdictions, the Indian Trade Marks law recognizes only colour, shape of goods, and sound marks as registrable marks. The Act specifically states that in order to secure trademark protection, a mark must either be graphically representable in a paper form or should have acquired distinctiveness or



secondary meaning due to its long-standing *bona fide* use. As various unconventional marks, such as smell, taste, touch/texture, and hologram marks, cannot be graphically represented, therefore, they are not registrable in India.

Shape of goods marks

Shape of goods marks are one of the most recognized forms of unconventional trademark in India because it can be graphically represented and more so, it is possible to demonstrate that the mark is distinctive. The shape of goods mark helps protect the shape of such products whose shape has attained a distinct uniqueness and popularity so much so that public at large may recognize the product because of its shape. It is important to keep in mind that shape of goods mark is not registrable if the shape results from the nature of goods themselves or attains a technical result or gives some substantial value to the product. Protection in a shape of goods mark can be sought by simply reproducing two-dimensional graphical image of various angles of the product so that the trade dress is perceivable.

Examples of shape of goods marks

1.	3D shape of Calsberg beer bottle	
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2.	Coco-Cola shape of bottle	
3.	Exterior view of the Taj Mahal Hotel in Mumbai	

Sound marks

Sound marks are another form of unconventional trademarks commonly registered in India. While the Act of 1999, allowed the registration of sound marks, there were no specific guidelines or requirements for filing the application for sound marks. However, with the introduction of Trade Marks Rules in 2017 ('Rules'), specific rules for registering sound marks have been provided. In order to register a sound mark, the proprietor is now required to reproduce a sound clip along with the musical notations (not exceeding 30 seconds) in the trademark application. The acceptability of a sound mark depends upon whether the sound is or has become so widely distinctive that an average consumer would associate the sound with goods or services of only one proprietor. The first sound mark in India was granted in the year 2008 to Yahoo Inc.'s three-note Yodel. This registration opened the gateway to many other sound marks which were granted registration in the subsequent years. Because of the ability to easily reach and attract masses, the sound marks have gained popularity amongst the marketing teams of various corporates and


agencies. A few examples of registered sound marks in India include Nokia mobile phone's default ring tone, MGM film's lion's roar, Edgar Rice Burroughs' Tarzan yell, Mastercard's acceptance note, and Liongate' Rue's whistle from Hunger Games.

Colour marks

Colour marks in India still struggle to gain popularity because of the requirement of either proving high threshold of distinctiveness to be associated with the mark or proving that the mark has acquired secondary meaning due to continuous *bona fide* use. While, the shape of goods and sound marks are easier to distinct due to the visual appearance or the sound notations, colour marks are not given protection unless a particular colour or combination thereof can uniquely identify the commercial origin of its associated products and/or services. A trademark protection of a single colour mark is much more stringent than that of a combination of colours. To give an example, Cadbury UK Limited lost a long-drawn trademark battle against Nestle S.A. over the claim of the 'purple' colour used for its

packaging of Dairy Milk chocolates. However, there have been various instances in India where

a single colour trademark has been granted protection, and the same are illustrated hereunder:

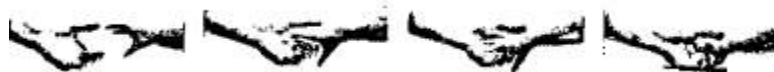
Examples of Colour marks		
1.	Victorinox AG's claim in the 'maroon' colour	
2.	Deutsche Bank's claim in the 'pink' colour	

The registrability of a combination of colours mark, however, is easier in comparison to the registrability of a single colour trademark as an average consumer may be able to better associate with a mark having a combination of two or more colours in comparison to mark having a single colour. Reliance can be placed on the case of *Colgate Palmolive Co. v. Anchor Health and Beauty Care Pvt. Ltd.* [108 (2003) DLT 51], wherein, the Delhi High Court observed that the plaintiffs successfully established a *prima facie* case for injuncting the defendant from using the colour combination of 'red and white' as a

trade dress on the container and packaging of their products.

Motion marks

Despite not been explicitly recognized by either the Act or the Rules in India, the first motion trademark was accepted in the name of Nokia Corporation's for its trademark CONNECTING HANDS in 2003. It is noteworthy to mention that this mark was accepted as a device trademark and several still pictures were reproduced (as illustrated hereunder), as a part of the mark, depicting step by step motions.



While the Trade Marks law emphasises that the mark should be 'graphically representable', the Applicants have managed to obtain registration for motion marks by reproducing all the moving elements of the mark in a paper form to be submitted as a part of the trademark application.

Conclusion

While few unconventional marks, such as sound, shape, colour, and motion continue to gain popularity in India, the Act's requirement of

the mark being graphically representable proves to be a major barrier in the acceptance/registration of other unconventional trademarks. While registration for the smell and taste marks may still be attempted by reproducing the chemical formula of the product have unique smell/taste, the possibility of registering the same under the Act seems to be a little low. Further, probability of registering the touch/texture and hologram marks seems to be very low or negligible as such marks may not be

graphically represented because touch/texture marks at present can be recognized by only human touch. Further, the hologram marks are required to be seen from certain angles to understand the distinctive character and may thus cannot be easily depicted in the trademark applications.

However, with the advent in technology, it is possible that new and innovative products, that may help in recognizing the touch/texture and depicting the holograms in 2D, may be introduced. Introduction of such advanced tools may help in allowing registration, examination, and recording of various unconventional marks.

Therefore, until further developments in the existing tools or trademark laws of India, including the amendment of the terms '*represented graphically*' in Section 2(1)(zb) of the Trade Marks Act, 1999, the likelihood of obtaining registration for smell, taste, touch/texture, and hologram marks in India is a far-fetched thought and the applicants may have to rely either on the conventional marks or the other forms of unconventional marks.

[The authors are Joint Partner and Senior Associate, respectively, in IPR Team at Lakshmikumaran & Sridharan Attorneys, New Delhi]



Ratio decidendi

Patents – Mere presence of standardised agents not makes two compositions identical – Admission of non-manufacture under Central Excise, not material

The Delhi High Court has held that the mere presence of standardised agents such as wetting agent, dispersing agent, filler and binding agent would not make the two compositions identical when in a case, the nature of the composition and the loading of a particular element (sulphur here), the utilisation of the same etc., are different. Analysing the two patent specifications, the Court observed that the process disclosed in prior art was related to sulphur of a lower concentration but with a bigger granule and particle size, while in the concerned patent (IN'429), the product was a composition having a

much higher sulphur loading/concentration and a lower granule and particle size. It was hence of the view that when a person skilled in the art analyses the earlier patent, there is no motivation for the said person to explore the opposite of what it teaches i.e., to use a higher loading of sulphur with lower granule and particle size. It also noted that while earlier patent was a fungicide, the subject patent was for a fertiliser.

Defendant's argument that the Controller ought not to have permitted the amendments to the claims was rejected by the Court while it observed that it is usual for the patent applicants to edit, amend, modify and vary the claims during the examination and opposition process. It held that no adverse conclusion can be drawn so long as the amendments were within the scope of the claims originally filed. Similarly, the question of

enhanced efficacy was also held in favour of the plaintiff as the Court observed that there was sufficient data available in the specification itself to meet the objections of Section 3(d) at the interim stage.

Further, the Court also rejected an interesting argument of the defendant that the plaintiff had admitted before the Commissioner of Customs that the physical and chemical properties of raw sulphur and the subject patent were the same, and that which in effect was an admission that there was no innovation. Granting interim relief in favour of the plaintiff, the High Court held that the test for determining whether a particular process constitutes 'manufacture' under the Central Excise Act, 1944 is different from the tests to determine novelty and inventive step, under the provisions of the Patents Act, 1970.

Noting that merely because the physical and chemical properties of the core ingredient (sulphur) were known and do not change, the Court was of the view that it does not mean that no patent can ever be granted on sulphur related compositions. It observed that it would be also incorrect to hold that if patents are granted for the manufacture of specific compositions, each such process would constitute 'manufacture' for the purposes of the Central Excise Act, 1944. [*Sulphur Mills Limited v. Dharamaj Crop Guard Limited and Anr.* – Judgement dated 2 August 2021 in CS(COMM) 1225/2018 & CC(COMM) 9/2019, Delhi High Court]

Patents – Export of patented drug under Section 107A – Apprehension of possible misuse must be manifestly credible

Relying on Court's earlier Division Bench decision in the case of *Bayer Corporation v. U.O.I.*, the Delhi High Court has held that there can be no restraint of export of a patented invention, provided such export is for research

and development purposes as prescribed under Section 107A of the Patents Act, 1970. It also held that the said provisions also do not require existence of any relationship between the applicant seeking the benefit and the foreign importer, to whom the API may be exported. The defendant was engaged in dealing with Sitagliptin Hydrochloride as an API, in non-commercial quantities while also exporting it, after obtaining requisite approvals from the Drug Control Authorities, for R&D purposes. It had pleaded that since the suit patent was expiring in April 2022, there was an urgent need to undertake R&D to make the generic drug.

Rejecting the plaintiff's contention of possible misuse by the foreign importer, the Court noted that it is not permissible for it to withhold, from a litigant, the magnanimity which a statute extends, merely on the ground of an apprehension of possible misuse. It held that the apprehension should be manifestly credible and real. The Court observed that the plaintiff did not allege that any part of exports made since 2016, by the defendant, was commercially exploited or misused. It noted that the plaintiff could not place on record even a single invoice, whereunder the product was ever commercially sold by the defendant, or by its foreign buyers. It also held that difficulty for the plaintiff to verify whether the APIs sold were being commercially exploited, cannot constitute a legitimate basis to deny the benefit.

The Court was also of the view that commercial gain, even if reaped by the defendant in the process, cannot disentitle it to the benefit of Section 107A as charity is foreign to commerce. It also stated that the Courts must aim at expanding, rather than constricting, the width and amplitude of the Bolar exception as prescribed under Section 107A, which is actuated by laudable public purpose. Further, nothing that plaintiff had itself, earlier, unreservedly agreed to

the extension of similar benefit to another company, the Single-Bench of the Court also held that non-grant of similar benefit to present defendant would be disadvantageous to them. [*Merck Sharp and Dohme Corp. v. SMS Pharmaceuticals Limited* – Judgement dated 20 July 2021 in I.A. 7615/2021 in CS (COMM) 463/2020, Delhi High Court]

Only one patent possible for one invention – High Court rejects interim relief against alleged infringement of two patents for one invention when inventor also same

In a case where the appellants/plaintiff had while claiming one invention had claimed infringement of two patents by the respondent/defendant, the Delhi High Court has declined to grant an interim relief. The Court observed that with respect to one invention, there can be only one patent and hence the same alone strikes at the very root of the claim of the appellants/plaintiffs and disentitles them from any interim relief. It noted that once the appellants / plaintiffs claimed infringement of earlier patent also, it necessarily followed that the product was subject matter thereof and once it was the subject matter thereof, it could not be the subject matter of the subsequent patent.

Observing that the rights of a patentee are statutory rights and the appellants/plaintiffs in their suits had claimed only one invention as subject matter of both the patents, the Court proceeded to examine the two patents, to decipher the invention claimed in each. It noted that there was complete identity, without any difference, between the field of invention as set out in the two patents. Further, noting that the inventor of both the patents was same, the Court held that once the inventor himself, while writing and seeking the patent, had not mentioned any technical advancement, difference in efficacy or

any economic significance of the new invention, the subsequent claims of the assignee of the patent, at least at the stage of judging *prima facie* case, cannot be accepted and have to be necessarily put to trial. The Court also noted the concerned product ‘Dapagliflozin’ was disclosed to be a single compound and thus cannot have more than one patent.

Dismissing the appeals with costs, the High Court was also of the view that the tests of ‘obvious to a person skilled in the art’ and ‘anticipation by publication’ and ‘use before the date of filing of patent application with complete specification’, in the context of an earlier patent and its specifications, have to be different when the inventor of both is the same. It held that when the inventor is the same, the tests cannot be ‘person ordinarily skilled in the art’ but have to be of the ‘person in the know’. [*Astrazeneca AB & Anr. v. Intas Pharmaceuticals Ltd.* – Decision dated 20 July 2021 in FAO(OS) (COMM) 139/2020, CMs No. 28068/2020 and Ors., Delhi High Court]

- 1. Patents invalid if could be exploited to prohibit others from achieving the same result, though by different methods**
- 2. Non-mention of legal provision is no ground for not invoking same – Pleadings to be read holistically**

In a case where patent was granted for an invention titled ‘Asymmetrical Beams for Spectrum Efficiency’, the Delhi High Court, in the suit for alleged infringement, has upheld the contentions of the defendant that the Patent No. IN 240893 was invalid and liable to revocation under Section 64(1)(h) & (k) of the Patents Act, 1970. The Court noted that though the plaintiff referred to the antenna as being the subject matter of the patent, patent claimed was of a method to achieve the desired result of increase in subscriber capacity by substituting one of the

sector antennas by a sub-sector antenna that generates plurality of asymmetrical beams that collectively substantially cover the coverage area of the replaced sector antenna. It noted that sector antennas/sub-sector antennas emitting asymmetrical beams existed earlier and that the patent neither said anything about the specifications of the sub-sector antenna to be used for substitution nor about the shape and size of the asymmetrical beam.

It was of the view that the apparatus described for achieving the said purpose was exemplary only and hence there was admission that the purpose can be achieved by collation of any other apparatus. The High Court observed that the said patent could be exploited to prohibit all others from devising methods of increasing subscriber capacity. Further, noting that the words used to describe the method by which increase in subscriber base was achieved, were vague and took within their ambit all methods of increase in subscriber base, the Court held that if the patent is granted merely with reference to the result (technical advancement and economic significance), the same would enable the

patentee to prevent others from inventing other products/processes/methods to achieve the same result.

Invalidating the patent, the High Court also rejected the plea of non-mention of Section 64(1)(h) of the Patents Act, 1970 in the written statement. It held that pleadings are to be read holistically and merely because a legal provision was not pleaded, cannot be a ground for treating a pleading as not invoking the same. The Court in this regard noted various pleadings of the defendant, including that the mobile antennae having asymmetric beam shapes were well known in the art and that the written description in the patent did not elaborate further on the design techniques. It observed that there was no subject matter in patent claims that could in pith and substance be considered to be of a nature which was not merely dictated by the functionality of the antenna. [*Communication Components Antenna Inc. v. Mobi Antenna Technologies (Shenzhen) Co. Ltd.* – Decision dated 10 August 2021 in CS(COMM) No.977/2016 & CC (COMM) No.38/2017, Delhi High Court]



News Nuggets

Parliamentary Committee recommends re-establishment of IPAB and many changes in Indian patent regime

The Department Related Parliamentary Standing Committee on Commerce has on 23 July 2021 submitted its Report reviewing the

intellectual property rights regime in India. In its 161st Report submitted before both the Houses of the Indian Parliament, the Committee while recommending re-establishment of the Intellectual Property Appellate Board ('IPAB'), also suggested many changes in the Patents Act, 1970. Amongst many of its other recommendations,

the Committee has suggested exploration of Patent Prosecution Highways ('PPH') with various countries and marking of products as 'Patent Pending'.



Observing that the overall scrapping of IPAB, which efficiently had been dealing with proceedings involving complex IPR issues, may create a void in appellate resolution and will increase pendency before the High Courts, the Committee desired that the abolition of IPAB should be reconsidered. According to the Report, rather than being abolished, the IPAB should be empowered and strengthened with more structural autonomy, infrastructural and administrative reforms, while it should be ensured that there is timely appointment of officials and experienced manpower.

Section 3(b) of the Patents Act has been recommended to be amended to limit the exclusion to only those inventions which are barred under any law for the time being in force. Amendments in Section 3(c) have also been proposed while asking the Department to explore the feasibility of granting patents to non-living substances occurring in nature. The Committee was also of the view that an analysis should be conducted by the Department on approving the patents on plants and seeds favourable to agriculture sector. The Committee was of the view that India must not compromise on the patentability criteria under Section 3(d) as it protects us from evergreening of the patents.

The Committee has recommended the Department to explore opportunities in establishing PPH with other nations (India has PPH with Japan at present). It also recommended the Department to explore avenues in incorporating the practice of marking products with 'patent pending' in India. It noted that provision for status of 'patent

pending' has been provided in the Patent Laws of USA.

No phonetic, visual or structural similarity between 'V Care' and 'I Care'

The Madras High Court has ruled that there is no palpable similarity, either phonetic, visual or structural between the two marks -  (of the plaintiff) and  (of the defendant). The Court noted that the common word 'CARE', used in both the marks, was a generic word and *publici juris* over which nobody can claim exclusiveness. Observing that the marks must be compared as a whole and cannot be dissected, it held that the defendant's mark was a device mark with several other visual elements and was completely different from both the word and logo of the plaintiff's mark. Dismissing the civil suit by passing the summary judgement, the High Court held that registered trade mark of the plaintiff was strikingly different from the mark of the defendant. The Court in *Praba's V Care Health Clinic Pvt. Ltd. v. I-Care Aesthetic Clinic* [Judgement dated 29 July 2021] was also not able to find common or similar essential features among the two trademarks and held that no person of average intelligence and poor recollection will be misled or get confused by the defendant's mark.

Patent revocation – Specific issues qua each ground of revocation ought to be framed

The Single-Judge Bench of the Delhi High Court has suggested that ideally on a plea of revocation, specific issues *qua* each ground of revocation ought to be framed, to make the parties aware and conscious at the time of framing of issues as well as at the time of adducing evidence of the grounds of revocation

on which judgment shall be pronounced. The Court in the case *Communication Components Antenna Inc. v. Mobi Antenna Technologies (Shenzhen) Co. Ltd.* [Judgement dated 10 August 2021] commended to the Committee of the Court on the administrative side which is in the process of framing rules under the Patents Act, to consider the aspect. The Court had, while framing the issue in the suit, had framed an omnibus issue on revocation of the patent.

Territorial jurisdiction of Court – Averments in plaint to be assumed correct, at interim stage

The Delhi High Court has reiterated that the objection to territorial jurisdiction of the Court must be construed by assuming that the averments in the plaint are correct, and that the objection must be decided on that basis alone. It held as not correct the contention of the defendant that mere alleged apprehension in the pleadings, unsubstantiated by documentary evidence, can never be a basis to seek jurisdiction. The Court in *Copenhagen Hospitality and Retails v. A.R. Impex* [Order dated 29 July 2021] held that the defendants would have to prove their contentions during trial. It also noted that the plaintiffs had

contended that the defendants were publicly expressing their intention to expand across the country and were entertaining franchisee queries within the territory of Delhi.

Trade marks – Non-rebuttal of assertions of damage and dishonest use, fatal

In a case where the defendant was using the mark 'Beardo' which was also being used by the plaintiff in respect of different class of goods, the Delhi High Court has granted interim relief to the plaintiff. The Court observed that the criteria envisaged by Section 29(4) of the Trade Mark Act, requiring cumulative satisfaction of conditions - identity or similarity of marks, plaintiff having a reputation in India, unfair advantage by the defendant's mark and use by the defendant without due cause, were satisfied. The High Court in *Zed Lifestyle Pvt. Ltd. v. Hardik Mukeshbhai Pansheriya* [Order dated 16 August 2021] noted that the plaintiff's assertions relating to irreparable damage to plaintiff and disingenuous nature of use by the defendant, were not rebutted by the defendant and hence, *prima facie*, were to be treated as correct.

NEW DELHI

5 Link Road, Jangpura Extension,
Opp. Jangpura Metro Station,
New Delhi 110014

Phone : +91-11-4129 9811

B-6/10, Safdarjung Enclave
New Delhi -110 029

Phone : +91-11-4129 9900

E-mail : lsdel@lakshmisri.com

MUMBAI

2nd floor, B&C Wing,
Cnergy IT Park, Appa Saheb Marathe Marg,
(Near Century Bazar)Prabhadevi,
Mumbai - 400025

Phone : +91-22-24392500

E-mail : lsbom@lakshmisri.com

CHENNAI

2, Wallace Garden, 2nd Street
Chennai - 600 006

Phone : +91-44-2833 4700

E-mail : lsmds@lakshmisri.com

BENGALURU

4th floor, World Trade Center
Brigade Gateway Campus
26/1, Dr. Rajkumar Road,
Malleswaram West, Bangalore-560 055.

Phone : +91-80-49331800

Fax: +91-80-49331899

E-mail : lsblr@lakshmisri.com

HYDERABAD

'Hastigiri', 5-9-163, Chapel Road
Opp. Methodist Church,
Nampally

Hyderabad - 500 001

Phone : +91-40-2323 4924

E-mail : lshyd@lakshmisri.com

AHMEDABAD

B-334, SAKAR-VII,
Nehru Bridge Corner, Ashram Road,
Ahmedabad - 380 009

Phone : +91-79-4001 4500

E-mail : lsahd@lakshmisri.com

PUNE

607-609, Nucleus, 1 Church Road,
Camp, Pune-411 001.

Phone : +91-20-6680 1900

E-mail : ls pune@lakshmisri.com

KOLKATA

2nd Floor, Kanak Building
41, Chowringhee Road,
Kolkatta-700071

Phone : +91-33-4005 5570

E-mail : lskolkata@lakshmisri.com

CHANDIGARH

1st Floor, SCO No. 59,
Sector 26,

Chandigarh -160026

Phone : +91-172-4921700

E-mail : lschd@lakshmisri.com

GURUGRAM

OS2 & OS3, 5th floor,
Corporate Office Tower,
Ambience Island,

Sector 25-A,

Gurgaon-122001

Phone : +91-124-477 1300

E-mail : lsurgaon@lakshmisri.com

PRAYAGRAJ (ALLAHABAD)

3/1A/3, (opposite Auto Sales),
Colvin Road, (Lohia Marg),
Allahabad -211001 (U.P.)

Phone : +91-532-2421037, 2420359

E-mail : lsallahabad@lakshmisri.com

KOCHI

First floor, PDR Bhavan,
Palliyil Lane, Foreshore Road,
Ernakulam Kochi-682016

Phone : +91-484 4869018; 4867852

E-mail : lskochi@lakshmisri.com

JAIPUR

2nd Floor (Front side),
Unique Destination, Tonk Road,
Near Laxmi Mandir Cinema Crossing,
Jaipur - 302 015

Phone : +91-141-456 1200

E-mail : lsjaipur@lakshmisri.com

NAGPUR

First Floor, HRM Design Space,
90-A, Next to Ram Mandir, Ramnagar,
Nagpur - 440033

Phone: +91-712-2959038/2959048

E-mail : lsnagpur@lakshmisri.com

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