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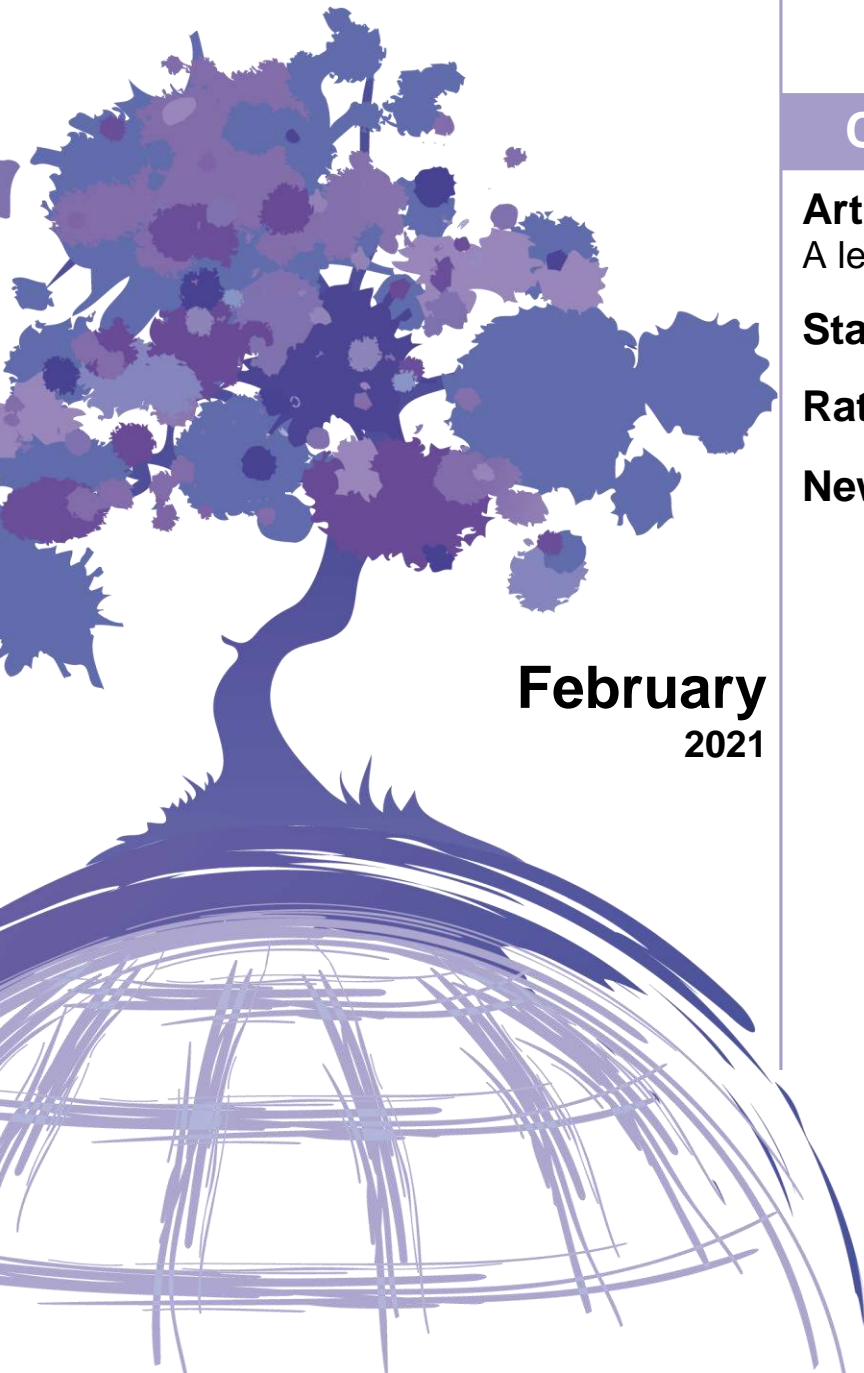
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Article

A legal tussle of music rights

By **Godhuli Nanda**

The Indian Performing Right Society ('IPRS') and the Phonographic Performance Limited ('PPL') are Copyright societies established under Section 33 of the Copyright Act, 1957 ('Act'). While IPRS is exclusively authorized to license the public performing rights with respect to literary and musical work created by its members, PPL charges and collects license fee from users on behalf of its members who hold rights to sound recordings which are played and performed in public. Thus, IPRS and PPL, though both registered as Copyright Societies, are registered for and in two different categories i.e. musical/literary works and sound recordings.

A Single Judge of the Delhi High Court *vide* Order dated 4 January 2021, decided two suits out of which the first was filed by IPRS against Entertainment Network (India) Ltd. ('ENIL'), the owner of Radio Mirchi FM, and the second was filed by IPRS and PPL against CRI Events Private Limited & others ('CRI & Ors') for infringement of the underlying copyright subsisting in a sound recording. The Single Judge dismissed the first suit and disposed of the second suit by issuing a limited permanent injunction against CRI & Ors.

Brief facts

IPRS was established to monitor, protect and enforce the rights, interests and privileges of its members, comprising of authors, composers and publishers of literary and/or musical works, and is the sole representative body of composers, authors and publishers of literary and musical

works in India. The members of IPRS have executed deeds of assignment, exclusively assigning their 'public performing rights' in respect of their literary and/or musical works in favour of IPRS. The primary task of IPRS is to collect royalties from users of music which communicate the literary/musical work to the public and thereafter disburse the same to its members.

PPL on the other hand is engaged in the business of enforcing the copyright of its members, who are leading music companies in India, in sound recordings assigned to PPL. PPL charges and collects license fee on behalf of its members, who hold rights to cassettes, compact discs and such other media of sound recordings, from users for use of sound recordings which are played and performed in public.

First Suit

ENIL is commonly known by its brand name 'Radio Mirchi'. ENIL entered into agreements with IPRS in the year 2001 for broadcasting of music in seven Indian cities. Thereafter, ENIL commenced broadcasting said music in three new cities but did not obtain further license. Therefore, IPRS filed a suit against ENIL claiming infringement of its public performance rights and sought a permanent injunction restraining ENIL from broadcasting the music to the public.

According to IPRS, exploitation of the sound recordings by broadcast also implies exploitation of literary and/or musical works forming part

thereof. Therefore, a license fee for both these works i.e. musical/literary works and sound recordings, must be paid separately by the users thereof, to each of the societies. Further, entering into a license agreement with one society will not absolve the user from liability to take license from the other.

ENIL on the other hand claimed that the copyright with respect to literary and musical works gets incorporated or merged with the sound recording and the lyricists and composers are divested of rights and the entire bundle of rights in a song belongs to the music companies. This is consistent with the trend in the music/film industry where sound recordings are made essentially for films and composers/lyricists assign all their rights to the producers of music. Therefore, IPRS cannot compel ENIL to separately execute a license agreement, when the entire bundle of rights vests in the music companies and those rights are administered by PPL. ENIL further claimed that it was already paying PPL with respect to its repertoire of the works.

Second suit

The second suit was filed by both PPL and IPRS against CRI Events Private Limited (CRI) and its official Rajesh Verma as well as against a banquet hall Nitish Kunj. CRI & Ors. are in the business of organising events at Nitish Kunj banquet hall where music is played during events, parties etc. As per IPRS and PPL, the said music was played without obtaining license from PPL or IPRS and was therefore infringing the copyright.

According to IPRS and PPL, music is made by a team of persons having different talents and consequently, the copyright in the different components of the music may belong to a number of individuals. The exploitation of a sound recording implies therefore, the

exploitation of the underlying literary and/or musical work. Accordingly, the license fee for these works, i.e. literary and musical works on the one hand and sound recordings on the other must be paid for separately by the users thereof to PPL and IPRS.

CRI & Ors., on the other hand, claimed that as event organisers were merely aggregators and it was the disc jockeys who play musical works in the events organised by CRI and would already have license from PPL and IPRS and similarly the banquet hall where such events were organised by CRI, would also have a license and therefore CRI was not required to obtain a license.

Observation of the Court

The suits were adjourned multiple times over the years while the interim reliefs were primarily in favour of the defendants. The Court took up the matter for final determination in view of various judgements pronounced in the interim stage, which went up to the Supreme Court on pure questions of law, majority of which were decided in favour of Defendants. The Court was concerned with some fundamental legal issues which, if decided finally in favour of the defendants, would leave nothing in the suits for trial.

The Court also noted that while the suits were pending, certain amendments affecting rights of composers/lyricists were made in 2012 to the Act and examined whether such amendments could be retrospective. The main amendment relevant for the case was in Section 19(10) which now provided that assignment of rights of lyricists/music composers to producers of sound recordings (not forming part of cinematograph films) would not disentitle the lyricist and music composers to claim equal royalties for exploitation of the underlying literary and musical work.

The main issue in both the suits was whether the communication of a sound recording to the public also amounts to communication of the literary and musical works embodied in the sound recording to the public. The second important issue that was agitated by the Plaintiffs was whether the aforesaid 2012 amendments were retrospective.

The Court observed that the literary work in a sound recording constitutes the lyrics of the sound recording and the musical work in the sound recording is the music (tune) on which the lyrics are spoken or sung. However, Court observed that a sound recording is not the sum total of lyrics and musical works only. For the lyrics to be heard, as distinct from being read, a voice is required, and which is not contributed by either the lyricists or the music composers. For all three to have an appeal to the human ear, the author of the sound recording (producer) shall arrange for an appealing and commercially viable amalgamation of the three. Yet further, the producer shall make a recording thereof in a form communicable to the public. Thus, the sound recording is something more i.e. something besides the literary or musical works therein.

The Court further observed that neither the owner of the copyright in the literary work nor the owner of the copyright in the musical works has any claim or right in the sound recording which is a work of joint authorship within the meaning of Section 2(z) of the Act. It is a distinct work produced by the collaboration of two or more authors and in which the contribution of one author is not distinct from the contribution of the other author or authors. The law recognises an independent copyright in a 'sound recording'. It is the owner of the sound recording who transforms the literary work which otherwise is a mere collection of words into a sound, capable of phonetic pleasure and who gives the composition of music a sound of various musical instruments.

Further, the Court observed that the above position in view of interpretation of the provisions would not change after the 2012 amendment. The new Section 19(10) is clarificatory in nature and there is no conflict between Section 19(10) and the above interpretation based on other provisions of the Act. This is because even the said provision is only saying that when the underlying works are assigned for sound recordings not forming part of a cinematograph films, the authors of such underlying works will still have rights to claim royalties for exploitation of such underlying work in any form. The Court said that the present matter concerns sound recordings which are part of cinematographs films. In India, most sound recordings are made for cinematograph films. The Act or the Court is not saying that the lyricists or composers will not have right to claim royalties for exploitation of their work other than 'sound recordings forming part of cinematograph works'. Thus, the Court held that Section 19(10) is not retrospective in nature.

The Court further observed that while the claim of IPRS against ENIL in the first suit is only on account of broadcasting the literary and musical works as part of sound recordings, the claim against CRI & Ors. in the second suit is of broadcasting the literary and musical works not only as part of sound recordings but otherwise also. Thus, if there is a live performance of songs incorporating the literary and musical works of members of IPRS, even if such songs also have a sound recording, for such live performance, licence from IPRS will be necessary.

Decision of the Court

Based on the above observations, the Court dismissed the first suit which was filed by IPRS against ENIL because the exploitation by the Defendant was admittedly only of sound recordings forming part of cinematograph films through radio broadcast and no separate

exploitation of lyrical/musical work took place. The Court also dismissed the similar claim of IPRS in the second suit. Court held that for playing sound recordings by CRI, license from PPL is essential. Court also held that since CRI's event also involved live performances of musical/lyrical works through other artists, exploitation is not only of the sound recording but of the underlying works and license from IPRS for such live performances was necessary. In cases where CRI exploited works through sound recordings as well as live performances, license from PPL as well as IPRS

was essential. It may be noted that an appeal has been filed against the said decision of the Single-Judge. The Division Bench of the Court has directed for listing the matter on 3 May 2021 while stating that till further orders the impugned judgment shall not be relied upon or used as a precedent in any proceedings.

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Statute Update

Intellectual Property Appellate Board (IPAB) set to be abolished

The Ministry of Finance and Corporate Affairs has on 13 February 2021 introduced a Bill in the Lower House of the Indian Parliament (Lok Sabha) which seeks to abolish various Tribunals and Authorities, including the Intellectual Property Appellate Board ('**IPAB**'). Other than the IPAB, the Tribunals Reforms (Rationalisation and Conditions of Service) Bill, 2021, ('**Bill**') proposes to abolish the Appellate Tribunal under the Cinematograph Act, 1952, Authority for Advance Rulings under the Income-tax Act, 1961, Airport Appellate Tribunal under the Airports Authority of India Act, 1994 and the Plant Varieties Protection Appellate Tribunal under the Protection of Plant Varieties and Farmers' Rights Act, 2001.

The Bill also seeks to provide a mechanism for filing appeal directly to the Commercial Court or the High Court and for transfer of all cases pending before such tribunals or authorities to

the Commercial Court or the High Court on the appointed date.

According to the Statement of Objects and Reasons appended to the Bill, the Tribunals that are proposed to be abolished at present are of the kind which handle cases in which public at large is not a litigant or those which neither take away any significant workload from High Courts which otherwise would have adjudicated such cases nor provide speedy disposal.

Amendments for this purpose have been proposed in the Cinematograph Act, 1952, the Copyrights Act, 1957, the Customs Act, 1962, the Patents Act, 1970, the Airport Authority of India Act, 1994, the Trade Marks Act, 1999, the Geographical Indications of Goods (Registration and Protection) Act, 1999, the Protection of Plant Varieties and Farmers' Rights Act, 2001, the Control of National Highways (Land and Traffic) Act, 2002 and the Finance Act, 2017.

Patents – Fees payable by eligible educational institutions set to reduce

Fees payable by the eligible educational institutions covering institutions established by a Central, Provincial or State Act, which is owned or controlled by the Government, and is wholly or substantially financed by the Government, under various provisions of the Patent Act and Rules, is set to be reduced. The Department for Promotion of Industry and Internal Trade, Ministry of Commerce and Industry has on 9 February 2021

issued draft Patents (Amendment) Rules, 2021 and sought objections and suggestions within 30 days. As per the proposal, the eligible educational institutions would be at par with the natural persons, start-up and small entities for both e-filing and physical filing. It may be noted that recently in November 2020, the fees payable by a small entity was reduced and brought at par with what is payable by a natural person or a start-up.



Ratio decidendi

Trademark – Common nature of the word is not sufficient determinant to refuse relief

In a case involving alleged infringement of the trademark 'YOGI' used for herbal and ayurvedic preparations, by the mark 'THE YOGI' for the same product range, the Bombay High Court granted an *ad interim* injunction in favour of the plaintiff.

The Court, *prima facie*, found considerable force in the arguments that the common nature of the word itself is not a determinant sufficient to refuse relief. It noted that the test in infringement is whether in relation to the market segment and the class of goods (Ayurvedic/herbal preparations), the Defendants mark 'THE YOGI' can be said to be deceptively and confusingly similar to the Plaintiffs mark 'YOGI'. The Court was of the view that one must accept the registration as it stands in relation to the products, goods, and services in respect of which

the mark and its formative marks are used, and that it will apply both for the word mark and the device mark.

Further, it observed that the statutory classification under various classes of products was not of much consequence and the fact that the Plaintiff's applications in classes 03 and 05 were pending will also not make a material distinction. It noted that it would be difficult to carve out a distinction that the Plaintiff can maintain an infringement action for its 'YOGI' mark for one set of Ayurvedic or herbal goods, but for another set that falls in class 03 or 05, it must be confined to a cause of action in passing off. The Court also noted that there was sufficient phonetic, structural, and visual similarity between the two marks. [*Yogi Ayurvedic Products Pvt. Ltd. v. The Yogi & Ors.* – Order dated 8 February 2021 in Commercial IP Suit (L) No. 1604 of 2021, Bombay High Court]

Patent infringement – Interrogatories under Order XI Rule 2 CPC when not permissible

A Single-Judge of the Delhi High Court has held that interrogatories by the Plaintiffs to extract something, which it could do so in the course of cross examination, cannot be allowed. The Court accordingly dismissed the application by the Plaintiffs under Order XI Rule 2 of the Civil Procedure Code as amended by the Commercial Courts Act, 2016. The Court observed that as a general rule, interrogatories are to be allowed whenever the answer to them will serve either to maintain the case of the party issuing them or to destroy the case of the adversary. It noted that the Plaintiffs application was to discover the fact, which constituted the exclusive evidence of the Defendant's case and that it was a roving and fishing inquiry, which cannot be allowed through the process of interrogatories. The Court finally held that the grounds asserted by the Plaintiffs could be taken care of through the process of cross examination of the Defendant's witness to test the credibility of the stand of the Defendant.

The Plaintiff had averred that the Defendant had failed to discharge the burden of proof as stipulated under Section 104A(1)(b) of the Patents Act, 1970 and that the Defendant's disclosure of the alleged process for manufacture of Amoxicillin Trihydrate, was ambiguous and not suitable for filing with the regulatory authorities. It was asserted that as the Defendant had sought approval of the regulatory authority, it was incumbent upon them to place before Court the process filed by the Defendant to manufacture the said product. The Defendant on the other hand asserted that regulatory approvals procured by the Defendant for manufacture of Amoxicillin Trihydrate, were not the subject matter of the present suit, and that the Court was not the appropriate judicial forum to adjudicate such disputes in a patent infringement suit. The

Defendant also asserted that the details of Defendant's manufacturing unit/facilities sought by the Plaintiff were also not relevant to the present dispute. [*Centrient Pharmaceuticals Netherlands B.V. Anr. v. Dalas Biotech Limited – Order dated 27 January 2021 in CS(COMM) 218 of 2019*]

Trademarks – Registration of label mark not confers exclusive right to use of word therein

The Madras High Court has set aside the Order of the Single-Judge Bench granting interim injunction in a case involving alleged infringement of a mark 'Coronil'. The plaintiff was a manufacturer of material handling system and polymeric epoxies under the label mark 'Coronil-213 SPL' and 'Coronil-92B', which came under Class I, whereas the defendant was marketing 'Coronil' tablets (word mark) as immunity boosters and fell under Class 5.

The Court noted that the plaintiff though invented the word 'Coronil', to inspire an imagination that the use of its product would prevent corrosion in the industrial machines, they never choose to apply for registration of the word 'Coronil' and thus compromised the registration by being satisfied with registration of the composite labels. Allowing the appeal, it noted that the registration of the label mark was also with a disclaimer (under Trade and Merchandise Marks Act, 1958) to the alpha numerals, namely 92 B and 213 SPL, and that the registration of the label did not confer any exclusive rights over the word 'Coronil'. Supreme Court's decision in the case of *Registrar of Trade Marks v. Ashok Chandra Rakhit Ltd.*, holding that the distinct label registered as a whole cannot give any exclusive statutory right to the proprietor of the trademark in any particular word, the name contained

therein, apart from the mark as a whole, was relied upon.

The Court was hence of the view that mere registration of a composite, consisting several features namely a device, a word and disclaimed alpha numerals 92 B and 213 SPL, cannot provide any right to file a suit for infringement under Section 29(4) of the Trade Marks Act, 1999. It also observed that when each part of a

label mark is capable of being individually registered, the Court cannot dissect and split up into its component parts and grant an injunction. It was held that the plaintiff had not made out a *prima facie* case for grant of interim relief. [*Pathanjali Ayurved Limited v. Arudra Engineers Private Limited* – Judgement dated 2 February 2021 in O.S.A. No. 169 of 2020, Madras High Court]



News Nuggets

Trademark ‘It’s like milk but made for humans’ has distinctive character

The European Union’s General Court has annulled the decision of the Board of Appeal of the EUIPO regarding non-registration of the mark ‘It’s like milk but made for humans’. The Court was of the view that the mark has the minimum degree of distinctive character required by Article 7(1)(b) of the EU’s Regulation 2017/1001. Noting that the mark questions the commonly accepted idea that milk is a key element of the human diet, the Court held that the mark thus conveys a message which is capable of setting off a cognitive process in the minds of the relevant public making it easy to remember. The General Court in its decision in the case *Oatly AB v. EUIPO* [Judgement dated 20 January 2021] held that the mark was thus capable of distinguishing the applicant’s goods from goods which had another commercial origin.

Infringement of trade dress and packaging – Non-adoption of similar trade dress earlier fatal

Observing that till the time the product alleged to be infringing the plaintiff’s trade dress was manufactured by the defendant, the latter were not adopting any trade dress for their other products, which were similar to that of the plaintiff’s product, the Delhi High Court has granted interim injunction against the defendant. Holding that there was a *prima facie* case of deliberate infringement, the Court also observed that the test for comparison is not for identifying dissimilarities between the plaintiff’s product and the allegedly infringing product of the defendant, but to see whether the defendant’s product is deceptively similar to that of the plaintiff. The Court in the case *Beiersdorf AG v. RSH Global Private Limited & Anr.* [Order dated 28 January 2021] also noted that the defendants’ product was contained in a similar container with white letters on a blue background, the shades of blue were similar to

the naked eye and most significantly had a white semi-circular splash towards the lower half of the container, which was *prima facie*, a feature distinctive to the plaintiff's product.

No likelihood of confusion between collective mark HALLOUMI and figurative mark BBQLOUMI

The European Union's General Court has upheld the EUIPO's view that there is no likelihood of confusion between the collective mark HALLOUMI (for cheese), reserved for the members of an association from Cyprus, and the sign 'BBQLOUMI' used for cheese, meat extracts, cheese-flavoured food products and catering services of a Bulgarian company. The Court was of the view that the low degree of similarity of the signs in question is unlikely to contribute to the existence of a likelihood of confusion. It observed that the attention of the relevant public will be drawn more to the initial part of the word element, namely the part 'bbq', owing to its position, rather than to the final part 'loumi'. Noting that the figurative element of the mark applied for (BBQLOUMI) played a differentiating role since the earlier mark (HALLOUMI) was a word mark, the Court in the case *Foundation for the Protection of the Traditional Cheese of Cyprus named Halloumi v. EUIPO* was of the view that the figurative element related more to the concept of 'barbecue' than that of 'cheese produced in a Mediterranean environment' since it was not possible to state categorically that the foods represented were pieces of halloumi cheese. Finally, the Court in this Judgement dated 20 January 2021, passed in remand proceedings from the CJEU, examined the degree of distinctiveness of the earlier collective mark and noted that it was weak.

Copyright infringement in software needs to be nipped in the bud: Delhi HC

Observing that software infringement is a serious issue and deserves to be nipped in the bud, the Delhi High Court has granted an *ad interim* ex-parte injunction pending a response from the defendants. The case involved alleged infringement of the copyrights of the plaintiff in its software 'SOLIDWORKS' by use of pirated and unauthorised versions of the software by the defendant. The plaintiff in the case *Dassault Systemes Solidworks Corporation v. Spartan Engineering Industries Private Limited* [Order dated 28 January 2021] had provided an exact copy of the information from its Exalead database (the infringement database portal) and furnished a tabulated statement, disclosing the MAC address, the total instances of infringement as well as the dates when the first and last occasion of infringement took place. It was pleaded that any entity, employing the plaintiff's software, in violation of the End User Licence Agreement and the Customer License and Online Service Agreement was in breach of plaintiff's intellectual property rights in the said software.

Trademark infringement – Continuation of ex-parte interim injunction for long not material when plaintiff's hand unclean

The Delhi High Court has held that merely because the ex-parte injunction had continued for long, cannot be a ground to continue it further, if the plaintiff is found to have approached the Court with unclean hands. The Court was also of the view that merely because the defendant had not considered it worthwhile to restrain the plaintiff from using the mark or to seek cancellation of the registration in favour of the plaintiff, it also cannot

be a reason to continue the restraint against the defendant. The dispute in the case *V.R. Industries Pvt. Ltd. v. Mohan Meakin Ltd.* involved alleged infringement and passing off by the defendant by use of the mark '8AM' for food items such as corn flakes, cereals, muesli, etc. and an ex-parte interim injunction was passed by the Court in 2013. The Court in its Order dated 29 January 2021 noted that the plaintiff had concealed the fact that Director of the plaintiff was a Senior Executive Officer of the defendant and the signatory of the plaint was the son of the said director and that both of them, till a few days prior to the institution of the suit were residing in the premises of the defendant.

IPAB – Technical Members can function without a Chairman

The Supreme Court of India has dismissed the application by which directions are sought from the Court that till a new Chairperson of the IPAB is appointed, the incumbent (whose tenure was extended by interim order of the Court, up to 31 December 2020) should continue to function as Chairperson. Observing that five technical members of the IPAB hold legal qualifications, with four being practicing advocates in specialised fields of intellectual property and one having experience in patent office, the Court held that the argument that the technical members, in their position at the Board as of now, cannot function without a chairperson, was unsustainable. Interestingly, the decision in this case *International Association for Protection*

of Intellectual Property (India group) v. Union of India was pronounced on 12 February 2021, just a day before a Bill was introduced in the Indian Parliament to abolish the IPAB.

Patent pre-grant oppositions – IPAB lays down guidelines for disposal

In order to overcome the undue delay in disposal of pre-grant oppositions resulting from the serial filing of such oppositions, the IPAB has laid down certain guidelines for the purpose. As per the IPAB Order dated 3 February 2021, if the Controller has heard all the existing parties in accordance with the Rule 55(5) and has reserved the order, he shall go ahead with pronouncement of the order, even if some pre-grant opposition is filed between the date on which he has reserved the order and the date of pronouncement of the order. For the subsequent pre-grant opposition, the Controller shall consider that whether any new ground has been established or any new documents have been relied upon. Further, electronic filing module of the IPO for accepting pre-grant opposition to be carefully modified to avoid acceptance of applications where the application for patent is not subsisting. 'Any person' filing the pre-grant opposition must submit his valid Aadhar Card/Voter ID Card/ Passport/ Driving Licence to authenticate his identity. Lastly, as per IPAB Order dated 3 February 2021 in the case *Novartis AG v. Controller*, in case of all pending pre-grant oppositions, if the pre-grant opponent has not filed proof for his identity, he should be given one chance to submit the same within 15 days.

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