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An e-newsletter from
Lakshmikumaran & Sridharan, India

July 2021 / Issue-118

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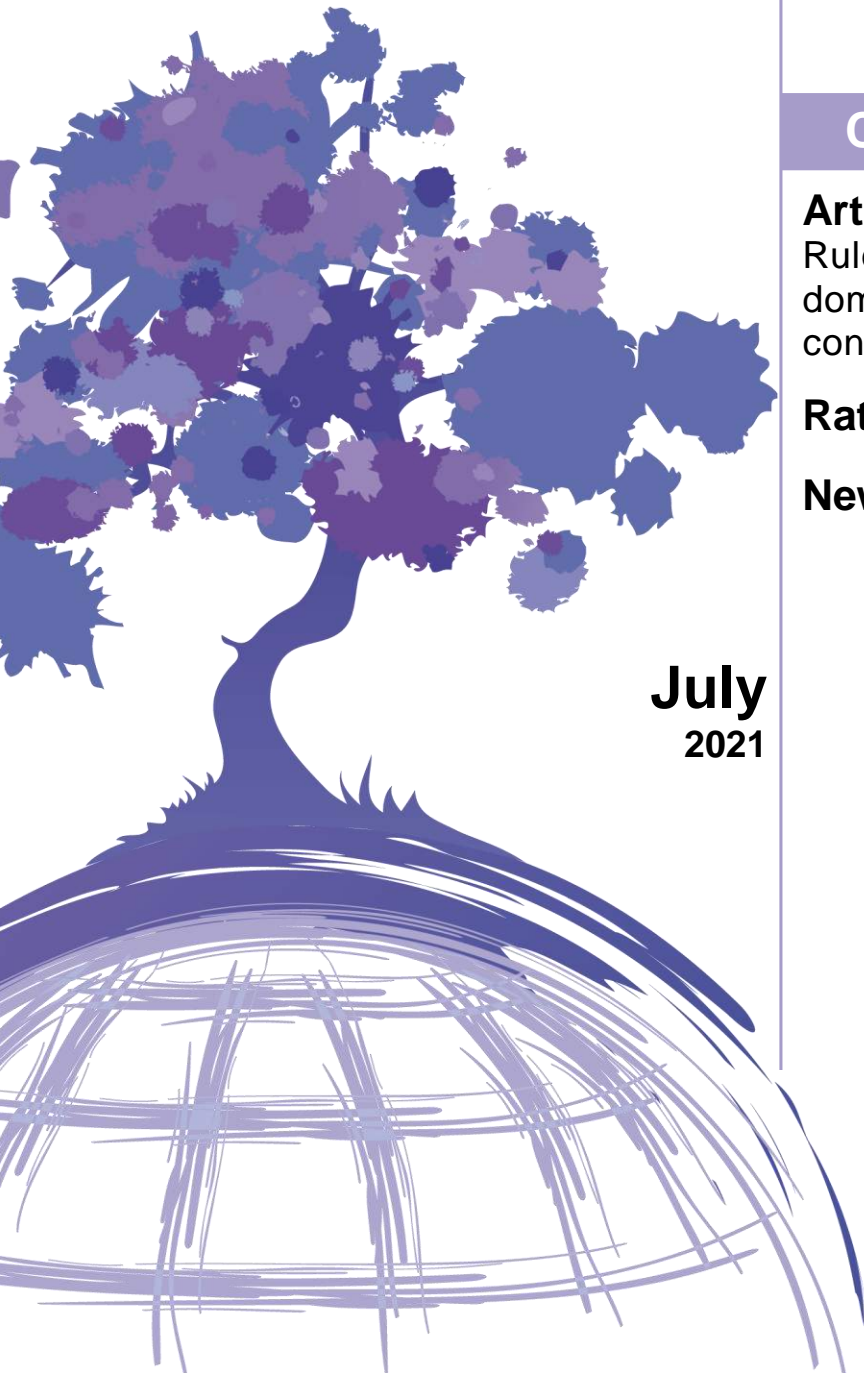
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Article

Rule of anti-dissection v. Rule of dominant feature – A legal conundrum

By Anoop Verma, Garima Raonta, and Pulkit Doger

Introduction

The likelihood of confusion or deception amongst the consuming public is a *sine qua non* element in an action for infringement or passing off. There are various parameters that are taken into consideration while assessing the degree of likelihood of confusion between two trademarks, such as the goods and services under the disputing marks, the class of consumer, and the trade channels involved, *inter alia*. The Triple Identity Test, which is an amalgamation of the aforementioned three parameters, is often relied upon by the Judiciary to assess the similarity between two marks and/or likelihood of confusion amongst the public. The test has been relied upon in various cases¹ wherein it has been observed that where the Defendant has made use of an identical/deceptively similar trademark in relation to identical goods having an identical trade channel, the balance of convenience would tilt in the favour of the Plaintiff.

It is a settled principle of law that deceptive similarity is adjudged based on the visual, phonetic, and structural similarity between the marks in question. The process of assessing similarity between two composite marks, births a direct conflict between the 'Rule of Anti-Dissection' and the 'Rule of Dominant Feature'. While the spirit of the former rule has been captured by Sections 15 and 17 of the Trade Marks Act, 1999 ('Act'), the latter is a product of

many judicial pronouncements. There has been a constant debate around the two rules and this article endeavours to bring clarity on this subject matter.

Meaning of the Rules

A plain reading of Sections 15 and 17 of the Act evidences the fact that the legislative intent behind these provisions is that where a trademark consists of several elements, it should be viewed as a whole, i.e. as an indivisible unit, and unless a part of such a composite trademark is separately subject of trademark protection, the Proprietor has no exclusive right *qua* a part of the composite mark. The rule of anti-dissection is based on the basic assumption that an ordinary prospective buyer would be impressed by the composite mark as a whole and not by its component parts. Hence it promotes the idea that 'technical gymnastics' should not be done in an attempt to find some minor differences between conflicting marks.

On the other hand, over the years the judiciary has propounded the rule of dominant feature which means that a mark is said to be infringed by another trader if, even without using the whole of it, the latter uses one or more of its essential features². This rule is based on the understanding that a consumer of average intelligence having an imperfect recollection might only retain the prominent part of a composite mark. The reflection of the rule of

¹ *Sumeet Research and Holdings v. Sipra Appliances* - CS (COMM) 428/2016 and I.A. 13428/2015

² *S.M. Dyechem Limited v. Cadbury (India) Limited* - C.A. No. 3341/2000 (Arising out of SLP (C) No. 15398/99)

dominant feature could be seen in Section 11(b) of the Act which states that a mark ought not to be registered if the said mark is 'similar' to an earlier mark and is being used with respect to similar or identical services and capable of causing confusion and deception amongst the public. Here, a deceptively similar mark³ could also mean a mark wherein the dominant feature of another mark is being used.

Therefore, it appears that there is a direct clash between the said rules because as per the letter of law, the rule of dominant feature is arbitrary and should not be applied. However, in practice, the rule of dominant feature is being applied and relied upon often.


Judicial viewpoint

The Courts in India appear to be in conflict on the applicability of the rule of dominant feature and the rule of anti-dissection. In certain cases, the rule of anti-dissection has been preferred over the rule of dominant feature, whereas, in certain other cases, it has been the other way around.

For instance, in the case of *Phonepe Private Limited v. Ezy Services and Ors*⁴ the Court while recognizing the rule of dominant feature held that the term 'Pe' in the competing marks i.e. 'PhonePe' and 'BharatPe' was descriptive in nature as it was intended to mean 'Pay'. Therefore, the same cannot be held to be the dominant feature of the said marks. However, the Court also observed that composite marks cannot be dissected. It is also pertinent to note that in the case of *Cadila Healthcare Ltd. v. Aureate Healthcare Pvt. Ltd. and Ors*⁵, it was observed that while examining the question of misrepresentation or deception, the comparison must be made between the two trade

marks as a whole. It was held that the Defendant's mark, PANTOBLOC, was deceptively similar to the Plaintiff's mark PANTODAC.

On the other hand, the Delhi High Court in the case of *South India Beverages Pvt. Ltd. v. General Mills Marketing Inc*⁶ while stating that the rule of anti-dissection is the primary parameter that is to be followed, observed that it is permissible to accord more or less importance or 'dominance' to a particular portion or element of a mark in cases of composite marks. It was observed by the Court that both the elements constituting the mark of the Plaintiff, i.e., 'HAAGEN' and 'DAZS' are equally dominant and are liable to be accorded sufficient protection under the legal framework. An injunction was granted against the Defendant who was using the mark D'DAAZ. It is also noteworthy to mention the case of *SabMiller India Ltd. v. Jagpin Breweries Ltd.*⁷, wherein the Plaintiff was the

proprietor of the marks '  ' and 'FIVE THOUSAND' and the Defendant claimed to be the proprietor of the mark 'COX 5001'. The Court observed that the balance of convenience was in favour of the Plaintiff, as irreparable harm and injury would be caused to the Plaintiff if the Defendant was not enjoined from using the impugned trademark COX 5001 in respect of beer as that would lead to confusion amongst the consumers.

At the same time, the Courts have also recognized that the rule of dominant feature is not in violation of the rule of anti-dissection. For instance, in the *South India Beverages Pvt. Ltd. v. General Mills Marketing Inc*⁸ case above, the Court observed that the principle of anti-dissection and identification of 'dominant mark' are not antithetical to one another and if viewed in a holistic perspective, the said principles rather

³ Section 2(1)(h), Trade Marks Act, 1999 'A mark shall deemed to be deceptively similar to another mark if it so nearly resembles that other mark as to be likely to deceive or cause confusion'

⁴ IA 8084/2019 in CS (COMM) 292/2019

⁵ I.A. No. 800/2011 and I.A. No. 4580/2011 in CS (OS) No. 123 of 2011

⁶ FAO(OS) 389/2014

⁷ 2014(5) Bom CR721

⁸ FAO(OS) 389/2014

complement each other. Further, the High Court of Delhi, while comparing the two Rules in the case of *Stiefel Laboratories v. Ajanta Pharma Ltd.*⁹ observed that the rule of dominant feature is not in violation of the rule of anti-dissection, rather it is a preliminary step on the way to an ultimate determination of the confusion amongst the consumers.

Conclusion

It is evident from above that the courts have been ebbing and flowing over the two rules as on one hand, the rule of dominant feature is being recognized while, on the other hand, it is promoting the notion that composite marks ought not to be dissected. The rule of dominant feature has been placed under the umbrella of the rule of anti-dissection which in our opinion is futile as the two are contradictory to each other by definition.

Once the rule of dominant feature is recognized as an independent rule and is not just considered as a preliminary step towards the ultimate determination, the same would be in conflict with Sections 15 and 17 of the Act. Since the Act only caters to the rule of anti-dissection and nowhere expressly mentions recognizes the rule of dominant feature. The clash between the

two might lead to arbitrariness and absurdity in the legal fraternity and/or amongst the public.

It is noteworthy to mention that India is a common law country and hence the law of precedents i.e. *Stare Decisis*, is also an eminent source of law. It was observed by the High Court of Delhi in the case of *South India Beverages Pvt. Ltd. v. General Mills Marketing Inc.* that ‘Where there are both similarities and differences in the marks, they must be weighed against one another to see which predominates’. Hence, which test is to be applied would completely depend on the unique facts of each case.

We would like to conclude by saying that the fundamental criterion for assessing similarity between two trademarks is the likelihood of confusion and there is no one straightjacket rule that can be relied on to assess the confusion amongst consumers. The same would depend on the unique facts of each case and therefore it would lead to arbitrariness and absurdity if one rule is given prominence over the other.

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Ratio decidendi

Copyrights – Statutory licence under Section 31-D read with Rule 29 – Strict compliance is *prima facie* mandatory

The Bombay High Court has rejected the plea that scheme of Section 31-D of the Copyright Act, 1957 entitles a broadcasting organisation to use

the works ‘the moment it sends a notice and payment’. Observing that though there is a statutory right to obtain a license, but it requires notice in the prescribed form to the holder of copyright, the Court noted that the defendant was not compliant with the provisions of Section 31D read with Rule 29 of the Copyright Rules, .

¹ CS(OS) No. 2373/2013

Rejecting, *prima facie*, the plea that parts of Rule 29 are required to be read down so that strict compliance is unnecessary, the High Court also held that the provisions of Section 31-D must receive a strict construction and there can be no room for a liberal or more free-wheeling interpretation. It noted that the 'notice' neither had the names of the programmes in which the copyright protected works were to be included, nor the details of time-slots, durations and period of programmes in which the works are to be included, as mandated by the said Rule. Plea that the FM radio shows are 'dynamic', i.e. the content of every radio show or broadcast is entirely unknown beforehand, was also rejected. It also noted that the defendant had not specified how it had computed the advance.

The High Court was also of the view that in opposition to the copyright infringement civil action, the defendant cannot mount a challenge to the validity of the Rules, or seek that these be read in any manner other than what their plain language and meaning demand. Observing that the entire scheme of Sections 31 to 31-D is a departure from the general principles in copyright law, inasmuch as they force the grant of licenses under various conditions, the Court was of the view that such statutory licensing, *prima facie*, hence must be rigidly controlled by statute. Time-limited ad-interim injunction was thus granted in favour of the plaintiff. [*Sony Music Entertainment India Private Limited v. KAL Radio Limited* – Order dated 18 June 2021 in Commercial IP Suit (L) No. 8229 of 2021, Bombay High Court]

Territorial jurisdiction of Court in a trade mark infringement suit – Self-generated sales by plaintiff cannot per se be labelled 'trap sales'

The Delhi High Court has rejected the contention that a solitary self-engineered sale cannot be relied upon by the Plaintiff in order to create a cause of action in particular place. Dismissing the

application contesting the jurisdiction of the Delhi High Court in a trade mark infringement suit, the Court noted that the Supreme Court in its decision in the case *Banyan Tree Holding (P) Limited* [2009 SCC OnLine Del 3780 (DB)] forbade only 'trap sales' that are contrived by adopting unfair means, for the purposes of creating a cause of action. It was of the view that self-generated sales by plaintiff cannot per se be labelled as 'trap sales', within the meaning of the aforesaid decision, if the defendant is otherwise found to be targeting its products at a place where the sale is made.

Considering the facts, the Court noted that it was *prima facie* established that the Defendant's offending products were not only freely sold on amazon.in, but were also available for sale to customers in Delhi on other third party marketplace websites e.g., Amazon, Flipkart, Snapdeal, Indiamart and Shopclues, which are universally accessible, including to customers in Delhi. The facts were held to satisfy the test of 'purposeful availment' laid down by the Supreme Court in *Banyan Tree Holding*, test of 'use' as laid down in *Burger King Corporation* [2018 SCC OnLine Del 10881] and the 'injury' test laid down in *Millennium & Copthorne International Limited* [2018 SCC OnLine Del 8260].

The High Court also held that if some part of cause of action has arisen at a place where the plaintiff has its branch/subordinate office, the Courts at that place will have jurisdiction to entertain a suit against infringement and passing off. It noted that the occurrence of cause of action has been read into Section 134 of the Trade Marks Act, on the lines of Section 20 CPC, as a determining factor, even though not spelt out in the language of Section 134. The Supreme Court decision in *Indian Performing Rights Society Limited* [(2015) 10 SCC 161] was relied for the purpose. [*V Guard Industries Ltd. v. Sukan Raj Jain* – Judgement dated 5 July 2021 in I.A. 3044/2021 in CS(COMM) 25/2021, Delhi High Court]

Patents – Cherry picking out of multiple choices available in earlier patent, in order to plead invalidity or obviousness, not correct

The Delhi High Court has, in an patent infringement suit, rejected the challenge to the validity of the plaintiff's product and process patents relating to the product Chlorantraniliprole ('CTPR'). Defendant's contention that CTPR stood taught by the Markush structure in Claim 22 of IN'978, as effecting substitutions in accordance with the embodiments provided in the said Claim itself, it is possible for a person skilled in the art to synthesise CTPR, was rejected by the Court. It observed that the defendant had cherry picked, without any explanation, the substitutions out of the multifarious choices provided in Claim 22 in IN'978, so as to arrive at CTPR. The Court was of the view that *prima facie*, a person skilled in the art would not selectively choose the substitutions unless he is aware of the fact that ultimately CTPR is to be produced.

Pointing out that the question to be asked is whether IN'978 taught, or instructed, a person skilled in the art to effect these particular substitutions in order to achieve the results, or advantages, which CTPR provides, the Court held that if the answer is in the negative, then, the fact that, by effecting selected substitutions the defendant was able to arrive at the Markush moiety claimed in subject patents, or even at CTPR, would not lead to an inference of infringement or even make out a case of vulnerability to revocation.

Observing that a 'trial and error' approach would be antithetical to any suggestion of 'obviousness', the Court held that the choice which the person skilled in the art would make, by way of substitutions on the Markush moiety or otherwise, must be apparent from the teachings

in the genus patent, in order for the specie patent to be treated as 'obvious'.

Further, considering the definition of 'dichotomy', the Court was of the view that in holding that there can be no dichotomy between coverage or claim, on the one hand, and disclosure or enablement or teaching, on the other, the Supreme Court in *Novartis* [(2013) 6 SCC 1] has not held that they (coverage and disclosure) are identical. Defendant's reliance on the Apex Court's decision was thus rejected.

Defendant's contention, relying on Section 13(4) of the Patents Act, 1970, that there is no presumptive validity of a patent on it being granted, was also rejected by the High Court. Reliance on the Supreme Court decision in the case of *Bishwanath Prasad Radhey Shyam* [(1979) 2 SCC 511] was held as not correct by the Court while it observed that there is difference between 'guarantee of validity' (as used by the Apex Court) and 'presumption of validity'.

Dismissing the defendant's application seeking interim injunction against the infringement of the suit patents by the defendants, the High Court also held that reliance on documents filed by other patentees in applications relating to other patents, or even on documents filed by the plaintiff itself while applying for other patents, cannot be relied upon, *prima facie*, to plead the existence of a credible challenge to the validity of the suit patent. Similarly, vulnerability of the suit patent on the grounds of anticipation by prior claiming, under Section 13(1)(b) read with Section 64(1)(a) of the Patents Act and anticipation by prior publication and lack of novelty under Section 64(1)(e), was also rejected. [FMC CORPORATION & ANR. v. BEST CROP SCIENCE LLP & ANR. – Judgement dated 7 July 2021 in CS(COMM) 69/2021 and CS(COMM) 611/2019, Delhi High Court]



News Nuggets

Intellectual Property Division (IPD) created at Delhi High Court

The Delhi High Court has created an Intellectual Property Division ('IPD') at the High Court to deal with matters related to Intellectual Property Rights. As per the Registrar General's Office Order dated 7 July 2021, the IPD would be governed by the IPD Delhi High Court Rules which are in the process of being framed. The original proceedings before the IPD would also be additionally governed by the Delhi High Court (Original Side) Rules, 2018 and the provisions of the Civil Procedure Code as applicable to commercial disputes and the provisions of the Commercial Courts Act, 2015. The Annexure to the Office Order, in this regard, also specifies the nomenclature etc. of the cases to be filed in the IPD and the court-fees, payable for the time being.

It may be noted that the President had on 4 April 2021 promulgated the Tribunals Reforms (Rationalisation and Conditions of Service) Ordinance, 2021 abolishing various Boards and Tribunals. Resultantly, the power to deal with all the pending matters before various specified Boards and Tribunals, including the Intellectual Property Appellate Board, as also fresh matters under Trade Marks Act, 1999, Protection of Plant Varieties & Farmers' Rights Act, 2001, Patents Act, 1970, Copyright Act, 1957 and the Geographical Indications of Goods (Registration and Protection) Act, 1999, have now been vested in the High Courts.

Sound as a trade mark – EU's General Court rejects registration of sound made by opening of a drinks can

Giving a ruling for the first time on the registration of a sound mark submitted in audio format, the European Union's General

Court has held that an audio file containing the sound made by the opening of a drinks can, followed by silence and then a fizzing sound, cannot be registered as a trade mark in respect of various drinks and for metal containers for storage or transport. The Court confirmed EUIPO's findings of lack of distinctive character of the mark while it observed that the opening of a can or bottle is

inherent to a technical solution connected to the handling of drinks in order to consume them and such a sound will therefore not be perceived as an indication of the commercial origin of those goods. It also noted that the sound elements and the silence, taken as a whole, do not have any inherent characteristic. It may however be noted that the Court in *Ardagh Metal Beverage Holdings GmbH & Co. KG v. EUIPO* [Judgement dated 7 July 2021] also held that the mere fact that a sound is made only on consumption does not mean that the use of sounds to indicate the commercial origin of a product is unusual.

WTO dispute brewing as Russia prohibits use of 'Champagne' in Cyrillic by foreign producers, instead asks to add 'sparkling wine'

Russia has recently introduced a law according to which the foreign producers of Champagne would be required to add the words 'sparkling wine' in the labels of the bottles, while Russian producers of 'shampanskoye, are exempted. Interestingly, the French producers can still use the word in French but will also have to write 'sparkling wine' in Cyrillic on the back of the bottles. It seems that the denial to write the word in Cyrillic is concerning the French wine industry

which is pressurising the France and the European Union to even take the issue to the World Trade Organisation (WTO). Champagne is a region in the northeast of France and is famous for the sparkling wine produced there. The name 'Champagne' is protected under Geographical Indications (GI) in EU and recognised in many countries. Article 23 of the Trade Related Aspects of Intellectual Property Rights Agreement (TRIPS Agreement) provides for 'Additional Protection for Geographical Indications for Wines and Spirits'.

Online platform operators when liable in respect of illegal posting of copyrighted material on the platform

In a case involving liability of the operators of online platforms regarding copyright-protected works illegally posted on such platforms by the users, the Court of Justice of the European Union (CJEU) has reiterated that operators of online platforms do not make a 'communication to the public', within the meaning of Directive 2001/29, unless they contribute, beyond merely making that platform available, to giving access of such content to the public in breach of the copyright. The CJEU in this regard noted that for the exclusion from the exemption from liability, the platform operators must have knowledge of or awareness of specific illegal acts committed by its users relating to protected content that was uploaded to its platform. The Court in the case *Frank Peterson v. Google LLC* [Judgement dated 22 June 2021] also clarified the circumstances in which, copyright holders can obtain injunctions against operators of online platforms.

Trade marks – No confusion between 'ROLF' and 'WOLF'

The European Union's General Court has upheld the EUIPO's finding regarding a low degree of visual and phonetic similarity between the figurative mark **ROLF** and the word mark 'WOLF', used in respect of identical goods. The Court was also of the view that there was lack of conceptual similarity. Further, observing that the visual and phonetic differences in the two marks will offset the similarities between the signs and will thus make the two signs sufficiently different in the mind of the relevant public, the General Court in *Wolf Oil Corporation NV v. EUIPO*

[Judgement dated 30 June 2021] held that despite the identical nature of goods, the EU's Board of Appeal was right in its finding that there is no likelihood of confusion between the marks in issue.

Amul gets relief from Canadian Court against Amul Canada

The Federal Court of Canada has upheld Amul's plea relating to passing off and infringement of the trade mark and infringement of the copyright in certain material by 'Amul Canada'. The Court in this regard observed that all the three elements for establishing passing off, i.e., existence of goodwill, deception of the public due to misrepresentations, and actual or potential damages to the plaintiff (Amul), existed. Observing that there was no indication of innocent misrepresentation by the Canadian entity, the Court also noted that there were potential damages whether through sales, marketing, distribution, and/or recruiting employees, through the unauthorized guise of

'Amul Canada'. The Defendants (Amul Canada) had advertised the Amul's trademark in association with goods listed in the Amul's registration through their LinkedIn page in the name of Amul Canada. Confirming the case of infringement as well, the Court in *Kaira District Co-operative Milk Producers' Union Limited v. Amul Canada* [Judgement dated 22 June 2021] noted that unauthorized use of the Amul mark was sufficient to infringe Section 20(1)(a) of the [Canadian] Trademarks Act while reproduction of Amul's copyrighted material without their consent was an infringement of copyrights as stated under Section 27 of the Copyright Act.

Intellectual property has its own sanctity – Delhi HC rejects application seeking disposal of pending stock

Relying upon the Coordinate Bench's decision in the case of *FMC Corporation v. Best Crop Science LLP*, the Delhi High Court has dismissed the application seeking permission to sell the existing stock of alleged patent-infringing product. Rejecting the defendant's proposal of providing a bank guarantee, the Court reiterated that intellectual property has its own sanctity and that damages are insufficient as a panacea for the holder of a valid patent which is infringed by another.

The defendant had sought permission to dispose of its existing stock till the time application of the plaintiff under Order 39 Rules 1 and 2 CPC and the defendants' application under Order 39 Rule 4 CPC are adjudicated upon. The Court had earlier in October 2020 passed an interim *ex-parte* order of injunction against the defendant. The High Court in its latest order dated 18 June 2021 in *Willowood Chemicals Pvt. Ltd. v. Indo-Swiss Chemicals Ltd.* also noted that despite the knowledge of dismissal of the pre-grant

opposition (filed by an association where the defendant was a member), the defendant produced and sold the alleged infringing goods and hence cannot now claim equity. It also noted that the report of the Local Commissioner also did not make a happy reading.

Trade mark injunction suit – Investigation of plaintiff's title to the mark

The Division Bench of the Delhi High Court has held that once petitioner (respondent before the Appellate Court) had expressly waived his right on the trade mark in favour of the defendant company (appellant before the Appellate Court), he cannot restrain the defendant from exercising the aforesaid rights, even though the said rights have been exercised after passage of substantial time. Setting aside the impugned order granting injunction, the Court noted that the plaintiff had, on its own pleas, disclosed no *prima facie* title to the subject trade mark to seek restraint against the defendant from using so. The Court in the case *AMPA Cycles Private Limited v. Jagmohan Ratra* [Judgement dated 6 July 2021] was of the view that the Single Judge Bench erred in investigating whether the defendant company had any right to the trade mark, when the title to be investigated was of the plaintiff. It noted that in terms of the Dissolution Deed, the plaintiff had clearly and unequivocally conceded in favour of the defendant company, the right to use the trade mark 'AMPA' and hence cannot now restrain the defendant company from usage of the said trade mark, unless it is able to show that the terms of the said Dissolution Deed were novated/revoked at a subsequent point of time. Fact that the defendant did not use the trade mark from 2011 to 2018 was held to be immaterial.

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