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

+ **CS(COMM) 1097/2025 & I.As. 25443-47/2025**

KUMAR SANU BHATTACHARJEE

.....Plaintiff

Through: Ms. Sana Raees Khan, Ms. Shikha Sachdeva, Ms. Kriti Rathi, and Ms. Annie Jacob, Advocates

versus

JAMMABLE LIMITED & ORS.

.....Defendants

Through: Mr. Varun Pathak, Mr. Yash Karunakaran and Mr. Debditya Saha, Advocates for D-7
Ms. Shilpa Gupta and Ms. Surabhi Pande, Advocates for D-15
Mr. Vivek Ayyagari and Mr. Abhinav Bhalla, Advocates for D-16
Ms. Nidhi Raman, CGSC with Mr. Om Ram, Advocate for D- 21 and D-22
Mr. Aditya Gupta, Adv. for D-6, D-17 and D-20

CORAM:

HON'BLE MS. JUSTICE MANMEET PRITAM SINGH ARORA

ORDER

% **15.10.2025**

I.A. 25447/2025 (seeking exemption from pre-litigation mediation)

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



2. Having regard to the facts that the present suit contemplates urgent interim relief and in light of the judgement of the Supreme Court in **Yamini Manohar v. T.K.D. Keerthi**¹, exemption from the requirement of pre-institution mediation is granted to the Plaintiff.

3. Accordingly, the application stands disposed of.

I.A. 25446/2025 (seeking to place on record pen drive/DVD/ VCD)

4. This is an application under Section 151 of the CPC, filed by the Plaintiff, for placing on record pen drive/digital versatile discs (DVD)/ Video Compact Discs (VCD) containing the audios/videos of the songs sung by the plaintiff.

5. Rule 24 of the Chapter XI of the Delhi High Court (Original Side) Rules, 2018 makes it clear that the electronic records can be received in CD/DVD/medium encrypted with a hash value. The said rule is extracted below:

" 24. Reception of electronic evidence – A party seeking to tender any electronic record shall do so in a CD/DVD/Medium, encrypted with a hash value, the details of which shall be disclosed in a separate memorandum, signed by the party in the form of an affidavit. This will be tendered along with the encrypted CD/DVD/Medium will be uploaded on the server of the court by the computer section and kept in an electronic folder which shall be labelled with the cause title, case number and the date of document uploaded on the server. Thereafter, the encrypted CD/DVD/Medium will be returned to the party on the condition that it shall be produced at the time of admission/denial of the documents and as and when directed by the court/Registrar. The memorandum disclosing the hash value shall be separately kept by the Registry on the file. The compliance with this rule will not be construed as dispensing with the compliance with any other law for the time being in force including Section 65-B of the Evidence Act, 1872."

6. Registry may receive electronic record on CD/DVD/VCD so long as it is encrypted with a hash value or in any other non-editable format. The video recording contained in CD/DVD/VCD be placed in the electronic

¹ (2024) 5 SCC 815



record of the present suit in a format which is non-editable, so that the same can be viewed by the court during hearing.

7. With the aforesaid directions, this application stands disposed of.

I.A. 25445/2025 (seeking exemption from filing original/translated copies)

8. This is an application under section 151 of CPC, filed by the Plaintiff seeking exemption from filing original/translated copies of documents.

9. Original documents shall be produced/filed at the time of Admission/Denial, if sought, strictly as per the provisions of the Commercial Courts Act, 2015 and the Delhi High Court (Original Side) Rules, 2018.

10. The translated/clearer copies of the documents be filed within two (2) weeks.

11. The application stands disposed of.

I.A. 25444/2025 (seeking leave to file additional documents)

12. This is an application under Order XI Rule 1(4) of the CPC [as amended by the Commercial Courts Act, 2015], seeking leave to file additional documents within 30 days.

13. The Plaintiff, if it wishes to file additional documents will file the same within 30 days from today, and it shall do so strictly as per the provisions of the Commercial Courts Act and the Delhi High Court (Original Side) Rules, 2018.

14. For the reasons stated in the application, the same is allowed.

15. Accordingly, the application is disposed of.

CS(COMM) 1097/2025

16. The present suit has been filed for permanent and mandatory injunction restraining infringement of copyright, misappropriation of



personality/publicity rights, dilution, passing off, along with other ancillary reliefs against the Defendants.

17. The plaint be registered as a suit.

18. Issue summons.

19. Summons be issued to Defendant Nos. 1, 2, 3, 4, 5, 9, 10, 11, 12, 13, 14 and 18 by all permissible modes on filing of process fee. Affidavit of service be filed within two (2) weeks.

20. The summons shall indicate that written statement(s) must be filed within thirty days from the date of receipt of summons. The Defendants shall also file affidavit(s) of admission/denial of the documents filed by the Plaintiff, failing which the written statement(s) shall not be taken on record.

21. The Plaintiff is at liberty to file replication thereto within thirty days after the filing of the written statement(s). The replication shall be accompanied by affidavit(s) of admission/denial in respect of the documents filed by the Defendants, failing which the replication shall not be taken on record.

22. It is made clear that any unjustified denial of documents may lead to an order of costs against the concerned party.

23. Any party seeking inspection of documents may do so in accordance with the Delhi High Court (Original Side) Rules, 2018.

24. No summons has been issued to Defendant Nos. 6, 7, 8, 15, 16, 17, 20, 21 and 22 since they are formal Defendants.

25. After Plaintiff has received Basic Subscriber Information[‘BSI’] details from Defendant Nos. 6 and 7 with respect to the unknown entities, it shall file an amended memo of parties within two (2) weeks from receipt of an information and thereafter summons will be issued to the said entities.



26. List before the learned Joint Registrar (J) for completion of service and pleadings on **05.12.2025**.

27. List before the Court on **30.03.2026**.

I.A. 25443/2025 (Under Order XXXIX Rule 1 and 2 CPC)

28. This is an application filed under Order XXXIX Rule 1 and 2 CPC seeking an ex-parte ad -interim injunction against the Defendants.

29. Ms. Sana Raees Khan, learned counsel appearing for the Plaintiff has setup the case as per the plaint as under:

29.1 The Plaintiff, Mr. Kumar Sanu Bhattacharjee, popularly known as Kumar Sanu or 'Sanu Da', is a renowned Indian playback singer with an illustrious career spanning over 42 years in the Indian music and entertainment industry. Revered as the 'Melody King of Bollywood', he gained prominence with his breakthrough in the 1990 film 'Aashiqui', following his debut in the Bangladeshi film 'Tin Kanya' (1986). He won the Filmfare Award for Best Male Playback Singer for five consecutive years (1990–1994) and was recently felicitated at the House of Lords, British Parliament, with the World Book of Records for recording 28 songs in a single day. A detailed list of select awards won by the Plaintiff is given at paragraph 21 of the plaint.

29.2 In recognition of his outstanding contribution to music, the Plaintiff, Mr. Kumar Sanu, has been honoured by the Governor of the State of Ohio, USA, who officially declared 31st March as 'Kumar Sanu Day', and was also conferred a Doctorate in Music by the American University, USA, in 2021. With a celebrated career spanning over four decades, the Plaintiff has consistently delivered numerous superhit songs, earning immense goodwill, reputation, and respect, and establishing himself as a distinguished and an



esteemed figure in the music fraternity and beyond.

29.3 It is stated that Plaintiff's personal name, 'Kumar Sanu' is protectable as trademarks, as any unauthorized use by third parties is likely to cause confusion regarding association, endorsement, or affiliation with him. The Plaintiff's distinct personality; comprising his name, voice, vocal style and technique, manner of singing, image, likeness and other unique attributes; is exclusively associated with him, and no person is entitled to use, imitate, or commercially exploit these elements without his prior consent or authorization.

Misuse by the Defendants

29.4 The Defendants are a range of AI platforms, online intermediaries, and digital entities engaged in unauthorized use of the Plaintiff's voice, image, and likeness. Defendant nos. 1–5 are AI platforms generating synthetic sound recordings and content imitating the Plaintiff; Defendant no. 6 (YouTube/Google) and Defendant no. 7 (Meta Platforms) host and circulate such AI-generated or distorted and unauthorized content; Defendant nos. 8 ("ShowbizShowsha") published a fake AI video of the Plaintiff; Defendant nos. 9–12 are websites and blogs commercially exploiting his name and personal details; Defendants nos. 13 to 16 are e-commerce sellers marketing merchandise featuring his image; Defendant nos. 17 to 19 are GIF platforms enabling sharing of visuals using his likeness; Defendant nos. 20 (Google Play Store) hosts an app titled 'Hit Kumar Sanu Songs' misusing his name.

Defendant nos. 21 and 22 (MeitY and DoT) are proforma parties for enforcement purposes; and Defendant 23 represents unknown 'John Doe/Ashok Kumar' entities engaged in similar infringing acts.



Submissions by the Plaintiff

30. Ms. Sana Raees Khan, learned counsel for the Plaintiff submits that any unauthorized use of the Plaintiff's name by third parties is likely to cause confusion or mislead the public into believing a false association, endorsement, or affiliation with the Plaintiff.

30.1 She states that these infringements involve the misuse of advanced technologies, including artificial intelligence, replicating or manipulating the Plaintiff's voice and image, morph his face into videos, distort his expressions, and overlay offensive audio, thereby exploiting his persona without consent.

30.2 She states that, given the Plaintiff's immense goodwill and reputation, any unauthorized use of his personal attributes, such as his name, voice, image, photograph or likeness, is bound to cause confusion and deception among the public regarding endorsement or association. She states that Plaintiff's voice itself has acquired a distinct identity and is instantly recognizable due to his unique style and manner of singing, which the trade and public exclusively associate with him; his image, likeness, and voice similarly evoke an immediate association with him alone, as his persona extends beyond his musical achievements to include his public image, conduct, and overall presentation.

30.3 She states that therefore, the Plaintiff seeks an ad-interim injunction to protect and preserve his personality as well as publicity rights, rights under the Copyright Act, 1957 and common law rights which are summarized at paragraph 34 of the plaint.

Submissions by the Defendants

31. In view of the directions issued by the Court vide order dated



13.10.2025, Mr. Pathak, learned counsel for Meta/Defendant No. 7 states that Plaintiff has raised its grievance with respect to four (4) profiles on the platform of Facebook and Instagram.

31.1 He states that a list of 34 URLs was provided by the Plaintiff as of 14.10.2025; he states, on instructions, that these URLs have now become unavailable.

31.2 He states that this also takes into account of the URLs on the social media account impleaded as Defendant No. 8.

32. Similarly, Mr. Aditya Gupta, learned counsel appearing on behalf of Google/Defendant no. 6 states that the Plaintiff has on 13.10.2025 provided a list of infringing URLs on 12 channels for take down.

32.1 He states that the URLs pertaining to channel by the name 'k.s.musicalsoul6452' at sr. no. (iii) has now become unavailable.

32.2 He states that on a perusal of the video, with respect to the URL enlisted at serial no. (vi) of the list provided by the Plaintiff, bearing the name 'haideralimirza4' appears to be an actual recording of the Indian television show 'Indian Idol Season 14' and not an A.I. generated video.

32.3 He submits that for the remaining URLs enlisted at serial no. (i) to (xii) [except (iii) and (vi)], the Defendant will take down the said URLs as per the directions of this Court.

32.4 In addition, he submits that 'tenor.com', impleaded as Defendant No. 17, is a platform owned by Google/Defendant No. 20, and he will represent the said platform.

32.5 He states that similarly the relief sought with respect to the App vis-à-vis the Google Play Store [i.e., Defendant No. 20] will also be represented by him.



32.6 He states that Defendant No. 6, 17 and 20 will therefore be represented by him and the correct entity is Defendant No. 6.

33. Ms. Shilpa Gupta, learned counsel appearing on behalf of Defendant nos. 15/Flipkart and Mr. Vivek, learned counsel appearing on behalf of Defendant No. 16/Amazon, respectively, states that they have not been served with an advance paper book; however, they will abide by the directions issued by this Court.

34. Mr. Om Ram, learned counsel accepts notice on behalf of Defendant No. 21/MeitY and Defendant No. 22/DoT.

Findings and Directions of the Court

35. This Court has heard the learned counsel for the parties and perused the record.

36. In this suit, the Plaintiff has joined its causes of action vis-à-vis the plea of unauthorized use of his personality rights by third-parties to sell merchandise for their commercial gains, impersonation the Plaintiff on social media platforms, use of the Plaintiff's attributes including voice by means of morphing and superimposing, including by means of AI and creation of GIFs.

37. The Plaintiff asserts violation of his statutory rights under the common law, Copyright Act, 1957 and more specifically, the Plaintiff asserts violation of his fundamental right to privacy as well as goodwill and reputation.

38. On basis of the assertions made in the plaint and perusal of documents filed on record, this Court is of the prima facie view that the Plaintiff is a notable singer/performer in India who has gained immense goodwill and reputation over the course of a very successful career and has acquired a



celebrity status in India.

39. This Court has already observed in **Karan Johar VS. Ashok Kumar/ John Doe & Ors** in the order dated 17.09.2025 in CS(COMM) 974/2025, that with the availability of advanced technology, it has indeed become possible and easy for any individual/entity to unauthorisedly and/or illegally use, copy and imprint the personality attributes of any celebrity for unearned commercial gains. Taking into consideration the commercial value of these publicity rights, a celebrity is entitled to safeguard his interest against any misuse of the personality attributes which includes his name, image, voice and likeness.

40. In view of the law settled in **D.M. Entertainment VS. Baby Gift House², Anil Kapoor Vs. Simply Life India** and **others³, Jaikishan Kakubhai Saraf Alias Jackie Shroff Vs. The Peppy Store and others⁴**, there can be no dispute that this status inherently grants the Plaintiff proprietary rights over his personality and associated attributes.

41. Therefore, prima facie the Plaintiff's personality traits and/or parts thereof, including Plaintiff's name Kumar Sanu, voice, image, photograph or likeness and other attributes are protectable elements of the Plaintiff's personality rights. The Plaintiff is entitled to protect itself against morphed and distorted content which is demeaning.

42. The Plaintiff has handed over a note in the form of a table elucidating the infringing and illegal activities carried out by the several Defendants on their social media accounts, websites which are available and accessible on the e-platforms of the intermediaries, which reads as under: -

² MANU/DE/2043/2010

³ 2023 SCC Online Del 6914 [Para graph Nos. 38 to 40]



S. No	Defendants	Infringing Activities
1.	Defendant No. 1 – Jammable Limited	Allows users to convert any YouTube link/ audio file user generative artificial intelligence (Gen AI) in Plaintiff's voice/ vocal style on the website.
2.	Defendant No. 2 – Voicestars	Generates audio files using generative AI (Gen AI) in Plaintiff's voice/ vocal style on the website.
3.	Defendant No. 3 – Opedia AI	Hosts a community-edited interactive encyclopedia/ chatbot providing information about the Plaintiff on the website.
4.	Defendant No. 4 – Lesto Labs LLC	Creates music/ parody videos of Plaintiff by converting text to speech using realistic generative AI (Gen AI) in the Plaintiff's voice/ vocal style on the website and mobile application, and Parrot App
5.	Defendant No. 5 – AI	Generates duplicate song lyrics in the Plaintiff's style using AI tools on the website.
6.	Defendant No. 6 – Google LLC d/b/a YouTube	Allows users to search and share infringing and/or morphed videos exploiting the Plaintiff's image, voice, vocal style, mannerisms, likeness and name, as uploaded by various third-parties on their YouTube channels/handles.
7.	Defendant No. 7 – Meta Platforms Inc. (FB & Instagram)	Allows users to search, view and share several infringing and/or morphed videos exploiting the Plaintiff's image, voice, vocal style, mannerisms, likeness and name, as uploaded by third-parties on social media platforms Facebook and Instagram.
8.	Defendant No. 8	ShowbizShowsha on Instagram has published video with morphed images of the Plaintiff.
9.	Defendant No. 9 – Bharat Lyrics	Publishes articles detailing incorrect personal information about the Plaintiff such as the Plaintiff's age, height, wife and romantic affairs/ relationships on the website.
10.	Defendant No. 10 – Stars Unfolded	Publishes a blog giving out unverified details about the Plaintiff's personal and private aspects of life, i.e. Plaintiff's Wife, Affairs, Family etc. on the website.
11.	Defendant No. 11 – Geocities.ws	Publishes a compilation of interviews and images of the Plaintiff bearing unverified information about the Plaintiff.
12.	Defendant No. 12 – Black Horse Entertainment	Claims to have contact details of the Plaintiff as his manager and is misleading public into contacting Defendant No. 12 to book the Plaintiff for events/

⁴ 2024 SCC OnLine Del 3664.



		brand endorsements etc. on the website.
13.	Defendant No. 13 – Vishesh Media	• Sells diaries with images/ photograph/ caricature of the Plaintiff on e-commerce platform Flipkart.
14.	Defendant No. 14 – Good Hope	• Sells wall art with images/ photograph/ caricature of the Plaintiff on e-commerce platform Amazon.
15.	Defendant No. 15 – Flipkart Internet Pvt. Ltd.	• Marketing and offering for sale musical books with the Plaintiff's images/ photograph/ caricature of the Plaintiff on e-commerce platform Flipkart.
16.	Defendant No. 16 – Amazon Seller Services Pvt. Ltd.	• Marketing and offering for sale wall art with the Plaintiff's images/ photograph/ caricature of the Plaintiff on their e-commerce platform.
17.	Defendant No. 17 – tenor.com	• Allow users to search for and share Graphics Interchange Format (GIFs) files exploiting the Plaintiff's image, likeness, and name on its website.
18.	Defendant No. 18 – makeagif.com	• Allow users to search for and share Graphics Interchange Format (GIFs) files exploiting the Plaintiff's image, likeness, and name on the website.
19.	Defendant No. 19 – Giphy	• Allow users to search for and share Graphics Interchange Format (GIFs) files using the Plaintiff's image, likeness, and name on the website https://giphy.com/gifs/CREDCLUB-kumar-sanu-9pROE1pf01vIhuuOrA
20.	Defendant No. 20 – Google LLC (Google Play Store)	• Allows users to share and download mobile application from Google Play Store titled 'कुमार शानू गान Kumar Sanu Song' exploiting the Plaintiff's name, image, likeness on the URL.

43. In view of the above, the Plaintiff has established a prima facie case for grant of an ex-parte ad interim injunction. The balance of convenience also lies in favor of the Plaintiff and against the Defendants. This Court is of the prima facie opinion that if an injunction is not granted in favor of the Plaintiff, irreparable loss and harm would be caused to the Plaintiff's reputation.

44. The Plaintiff during the hearing has clarified that after the filing of the suit, Defendant No. 3 has already taken down the infringing URL and therefore at this stage no directions are prayed for vis-a-vis the said



Defendant.

45. Similarly, in view of the submissions of Defendant No. 7 as regards the unavailability of the infringing URLs, no directions are being issued to the said Defendant.

46. This Court has perused the screenshot of the URL on the YouTube enlisted at Sr. No. (vi) and in view of the submission of learned counsel for Defendant No. 7 is satisfied that no case for issuing direction is made out. Similarly, this Court has perused the documents placed on record pertaining to Defendant Nos. 9, 10 and 11 and is not satisfied that a case for issuance of ex-parte take down is made out. The information published on the said domains appears to be a collation of publicly available information. Also, with respect to Defendant No. 18, this Court has perused the document filed at page 489 of the Plaintiff's Document and prima facie does not find that the content thereof violates the personality rights of the Plaintiff and therefore no case for issuing direction is made out at this ex-parte stage.

47. Learned counsel for the Plaintiff states that Plaintiff is not pressing for any relief qua Defendant nos. 9, 10, 11 and 18 at this stage. She states that she is also not pressing the directions against the URL link at Sr. No. (vi) on the social media platform of YouTube/Defendant No. 6.

48. The Plaintiff in the plaint has also raised a grievance with respect to morphed videos and posts containing profane language against him. These videos and posts were posted on the social media handles of Instagram and Facebook. In view of the submission of Defendant No. 7 that all these infringing videos and posts have become unavailable, no direction has been issued.

49. Accordingly for the remaining Defendants until the next date of



hearing following directions are hereby issued: -

49.1. Defendant Nos. 1, 2, 4, 5, 8, 12, 13, 14, 17, 19 and 23 or any one acting for or on their behalf are restrained from utilizing the Plaintiff – Kumar Sanu' name, likeness, image, voice, personality or any other aspects of his persona to create any merchandise, or in any other manner misuse the said attributes using technological tools such as Artificial Intelligence, machine learning, face morphing, GIFs either for monetary gains or otherwise to create any videos, photographs, etc., for commercial purposes, so as to result in violation of the Plaintiff's right.

49.2. Defendant Nos. 1, 2, 4, and 5 are directed to take down all infringing content, enlisted at **Annexure A** to this Order, that has been uploaded by the said Defendants and/or any other third-party on their website, as identified in the present proceedings as well as any other fresh link/ post/video/mobile application/URLs provided by the Plaintiff, which unlawfully infringe the Plaintiff's personality/publicity rights.

49.3. Defendant No. 6, 17 and 20 are directed to take down all infringing content, enlisted at **Annexure A and B** to this Order, that has been uploaded by the said Defendants and/or any other third-party on their platform, as identified in the present proceedings as well as any other fresh link/ post/video/mobile application/URLs provided by the Plaintiff, which unlawfully infringe the Plaintiff's personality/publicity rights. The said Defendants are also directed to provide the BSI details including the IP logs of the account owners who have published the said URLs and/or uploaded the App within three (3) weeks.

49.4. Defendant No. 7 is directed to ensure that the URLs, enlisted at **Annexure C** to this Order, that has been uploaded on the said URLs/social



media accounts and/or any other URLs/social media accounts, as identified in the present proceedings as well as any other fresh link/post/video/mobile application/URLs provided by the Plaintiff, which unlawfully infringe the Plaintiff's personality/publicity rights are taken down within 48 hours of receiving the information from the Plaintiff. The said Defendants are also directed to provide the BSI details including the IP logs of the account owners who have published the said URLs within three (3) weeks.

49.5. Defendant No. 12 is directed to take down the infringing link <https://topbollywoodcelebritycontactmanagement.home.blog/kumar-sanu-contact-phone-number-house-address-email-id-contact-address-1/>, within 48 hours as also mentioned in **Annexure A**, attached to this order.

49.6. Defendant Nos. 13 and 14 are restrained from selling and/or facilitating sale of merchandise which infringes the personality rights of the Plaintiff. The said Defendants are directed to delist the products, which are listed on their website and/or e-commerce website of third-party platforms as **enlisted at Annexure A to this Order**, within one (1) week.

49.7. Defendant No. 15 is directed to take down the infringing URLs enlisted in **Annexure A of this order** within one (1) week.

49.8. Defendant No. 16 is directed to take down the infringing URLs enlisted at **page no. 475 of the paper-book**.

49.9. Defendant No. 19 is directed to take down the infringing URLs enlisted in **Annexure A of this order** within one (1) week.

49.10. Defendant Nos. 21 and 22 are directed to require the respective Internet Service Providers ['ISPs'] to suspend all links/ websites/ mobile applications of the Defendants identified herein as well as any other fresh link/ website/ mobile applications/ URLs provided by the Plaintiff, which



unlawfully infringe the Plaintiffs personality/ publicity rights and to provide any details available with them about the parties operating such links/ website/ apps/ URLs.

50. The Plaintiff will be at liberty to approach Defendant Nos. 6 (Google LLC) and 7(Meta Platforms) through the counsels' who have entered appearance for taking down any mirror or identical content as well as social media accounts using his name which comes to its attention, in future. Upon receiving a request, Defendant Nos. 6 and 7 will act upon the said request within 48 hours and in case the said Defendants have any reservation they will communicate the same to the Plaintiff within 48 hours so that he can take appropriate remedial steps.

51. Issue notice to the non-appearing Defendant Nos. 1, 2, 3, 4, 5, 9, 10, 11, 12, 13, 14 and 18 through all modes.

52. Compliance of Order XXXIX Rule 3 CPC shall be done within a period of one (1) week.

53. List the matter before the Ld. Joint Registrar (J) on **05.12.2025**.

54. List the matter before the Court on **30.03.2026**.

55. The digitally signed copy of this order, duly uploaded on the official website of the Delhi High Court, www.delhihighcourt.nic.in, shall be treated as a certified copy of the order for the purpose of ensuring compliance. No physical copy of order shall be insisted by any authority/entity or litigant.

MANMEET PRITAM SINGH ARORA, J
OCTOBER 15, 2025/rhc/IB/AM



ANNEXURE A

S. No.	Defendants	Infringing Activities
21.	Defendant No. 1 – Jammable Limited	Allows users to convert any YouTube link/ audio file user generative artificial intelligence (Gen AI) in Plaintiff's voice/ vocal style on the website https://www.jammable.com/kumar-sanu-2OdBi
22.	Defendant No. 2 – Voicestars	Generates audio files using generative AI (Gen AI) in Plaintiff's voice/ vocal style on the website https://www.voicestars.co/ai-voice/ai-kumar-sanu
23.	Defendant No. 3 – Opedia AI	Hosts a community-edited interactive encyclopedia/ chatbot providing information about the Plaintiff on the website https://beta.opedia.ai/u/kumar-sanu/
24.	Defendant No. 4 – Lesto Labs LLC	Creates music/ parody videos of Plaintiff by converting text to speech using realistic generative AI (Gen AI) in the Plaintiff's voice/ vocal style on the website and mobile application being https://www.tryparrotai.com/ai-voice-generator/kumar-sanu and Parrot App
25.	Defendant No. 5 – There's an AI for that	Generates duplicate song lyrics in the Plaintiff's style using AI tools on the website https://theresanaiforthat.com/@rajibgartia/kumar-sanu-duplicate-song-lyrics-generator/
26.	Defendant No. 8 – ShowbizShowsha	ShowbizShowsha on Instagram has published video with morphed images of the Plaintiff at https://www.instagram.com/reel/C-kk2JdojIe/?utm_source=ig_web_copy_link
27.	Defendant No. 9 – Bharat Lyrics	Publishes articles detailing incorrect personal information about the Plaintiff such as the Plaintiff's age, height, wife and romantic affairs/ relationships on the website https://blog.bharatlyrics.com/kumar-sanu/
28.	Defendant No. 10 – Stars Unfolded	Publishes a blog giving out unverified details about the Plaintiff's personal and private aspects of life, i.e. Plaintiff's Wife, Affairs, Family etc. on the website https://starsunfolded.com/kumar-sanu/
29.	Defendant No. 11 – Geocities.ws	Publishes a compilation of interviews and images of the Plaintiff bearing unverified information about the Plaintiff.
30.	Defendant No. 12 – Black Horse Entertainment	Claims to have contact details of the Plaintiff as his manager and is misleading public into contacting the Defendant No. 12 to book the Plaintiff for events/ brand endorsements etc. on the website



		https://topbollywoodcelebritycontactmanagement.home.blog/kumar-sanu-contact-phone-number-house-address-email-id-contact-address-1/
31.	Defendant No. 13 – Vishesh Media	Sells diaries with images/ photograph/ caricature of the Plaintiff on e-commerce platform Flipkart on the URL https://www.flipkart.com/escaper-kumar-sanu-singer-diary-gift-personal-notebook-office-notepad-a5-ruled-160-pages/p/itmfd8302b3d9fb9?pid=DIAH9KV7T6BYZTMY&lid=LSTDIAH9KV7T6BYZTMY3N5DNJ&marketplace=FLIPKART&cmpid=content_diary-notebook_8965229628_gmc
32.	Defendant No. 14 – Good Hope	Sells wall art with images/ photograph/ caricature of the Plaintiff on e-commerce platform Amazon on the URL https://www.amazon.in/dp/B0FDG8Q6WN?ref=cm_sw_r_cp_ud_dp_RT3N4JGJKM1C9ZH96Q95_1&ref=cm_sw_r_cp_ud_dp_RT3N4JGJKM1C9ZH96Q95_1&social_share=cm_sw_r_cp_ud_dp_RT3N4JGJKM1C9ZH96Q95_1
33.	Defendant No. 15 – Flipkart Internet Pvt. Ltd.	Marketing and offering for sale musical books with the Plaintiff's images/ photograph/ caricature of the Plaintiff on e-commerce platform Flipkart on the URLs https://www.flipkart.com/hit-filmy-geetkumar-shanu-hindi-edition-music-entertainment-industry/p/itm4301174ce0d51?pid=RBKG6P8QH43ESM5J&lid=LSTRBKG6P8QH43ESM5JEKFFXY&marketplace=FLIPKART&q=kumar+sanu&store=bks&srno=s_1_1&otracker=search&otracker1=search&fm;https://www.flipkart.com/kumar-sanu-songs-swaralipi-bengali-language-hindi-included-book-old-new-page-quality-finest/p/itm5e475ec1b0ec?pid=RBKGKRHGVFUWH4FP&lid=LSTRBKGKRHGVFUWH4FPOIGXQD&marketplace=FLIPKART&q=kumar+sanu&store=bks&srno=s_1_2&otracker=sea
34.	Defendant No. 16 – Amazon Seller Services Pvt. Ltd.	Marketing and offering for sale wall art with the Plaintiff's images/ photograph/ caricature of the Plaintiff on their e-commerce platform.
35.	Defendant No. 17 – tenor.com	Allow users to search for and share Graphics Interchange Format (GIFs) files exploiting the Plaintiff's image, likeness, and name on the website https://tenor.com/view/kumar-sanu-live-bas-ek-sanam-chahiye-sanson-ki-zaroorat-sing-gif-16032957



36.	Defendant No. 18 – makeagif.com	• Allow users to search for and share Graphics Interchange Format (GIFs) files exploiting the Plaintiff's image, likeness, and name on the website https://makeagif.com/gif/aankhon-se-tune-ghulam-1998-kumar-sanu-alka-yagnik-hd-SYiCEX
37.	Defendant No. 19 – Giphy	• Allow users to search for and share Graphics Interchange Format (GIFs) files using the Plaintiff's image, likeness, and name on the website https://giphy.com/gifs/CREDCLUB-kumar-sanu-9pROE1pf01vIhuuOrA
38.	Defendant No. 20 – Google LLC (Google Play Store)	• Allows users to share and download mobile application from Google Play Store titled 'कुमार शानू गान Kumar Sanu Song' exploiting the Plaintiff's name, image, likeness on the URL https://play.google.com/store/apps/details?id=entertainerz.hitkumarsanusongs&pcampaignid=web_share



ANNEXURE B

LIST OF SPECIFIC INFRINGING URLS ON DEFENDANT NO. 6/20'S PLATFORMS (YouTube and Google Play Store)

S. No.	Link
I.	@Mayurkumar15
1.	https://www.youtube.com/shorts/8YJr4ifi0dY
2.	https://www.youtube.com/shorts/oH7fIDAslZg
3.	https://www.youtube.com/shorts/ETY4t67emVs
4.	https://www.youtube.com/shorts/L9JvWP6uG3E
5.	https://www.youtube.com/shorts/7t1FDKGbDAM
6.	https://www.youtube.com/watch?v=wY_YZSqPyVk
II.	@Mayurkumar8818
1.	https://www.youtube.com/shorts/2BXCZJme9Kk
2.	https://www.youtube.com/shorts/tjuDeeWAz_g
3.	https://www.youtube.com/shorts/lRfgnGV7d20
4.	https://www.youtube.com/shorts/UKKVBNeUOWg
5.	https://www.youtube.com/shorts/pULpP38514I
6.	https://www.youtube.com/shorts/vbFU6YfoXO4
7.	https://www.youtube.com/shorts/zyAk37bWRgo
8.	https://www.youtube.com/watch?v=TAHRHZ6vm1Q
9.	https://www.youtube.com/watch?v=PVFa_vYqAUw
10.	https://www.youtube.com/watch?v=n9-QHeb660w
III.	@k.s.musicalsoul6452
1.	https://www.youtube.com/shorts/uApNU342j1k
2.	https://www.youtube.com/shorts/RZuPITYFkdQ
3.	https://www.youtube.com/shorts/tWJA8nzHHMI
4.	https://www.youtube.com/shorts/yLLwgn0nwSM
5.	https://www.youtube.com/shorts/OXbyuvlqmco
6.	https://www.youtube.com/shorts/gAXXriKT0sE
7.	https://www.youtube.com/shorts/aCaVgwxups0
8.	https://www.youtube.com/shorts/TJlXd2eWYcM
9.	https://www.youtube.com/shorts/yDoDklyEqCo
10.	https://www.youtube.com/shorts/qlUtJy4iTeI
11.	https://www.youtube.com/shorts/2QFt5WRXjRI
12.	https://www.youtube.com/shorts/SP6Q-jS7bt0
13.	https://www.youtube.com/shorts/heH1x0pXiuQ



14.	https://www.youtube.com/shorts/ZmB4My852s4
15.	https://www.youtube.com/shorts/QM0Xo7zeXeo
16.	https://www.youtube.com/shorts/FGCmb13UFXg
17.	https://www.youtube.com/shorts/RIULpCiofP0
18.	https://www.youtube.com/shorts/qVDhpe0qCaU
19.	https://www.youtube.com/shorts/bO4-ZWBSajQ
20.	https://www.youtube.com/shorts/fRUDU70gF7M
21.	https://www.youtube.com/shorts/DJf2kPl0cuI
22.	https://www.youtube.com/shorts/549VZfx7SSQ
23.	https://www.youtube.com/shorts/3-eEI224Szw
24.	https://www.youtube.com/shorts/xM57dHab8SY
25.	https://www.youtube.com/shorts/StxmOf_NpJU
26.	https://www.youtube.com/shorts/1t9dd3GIAi4
27.	https://www.youtube.com/shorts/jWeaQDPPXtE
28.	https://www.youtube.com/shorts/KwKMqP5jiik
29.	https://www.youtube.com/shorts/984tun3s7EE
30.	https://www.youtube.com/shorts/mLk5AVy0Ahs
31.	https://www.youtube.com/shorts/ZaqzSd-g42o
32.	https://www.youtube.com/shorts/IHe-V1I9aA
33.	https://www.youtube.com/shorts/-6otMSi3cj8
34.	https://www.youtube.com/watch?v=GgJL9FoGq_E
35.	https://www.youtube.com/watch?v=GqSxie3RWgQ
36.	https://www.youtube.com/watch?v=mhTILvSaXJQ
37.	https://www.youtube.com/watch?v=132PG5-3qEo
38.	https://www.youtube.com/watch?v=xbInuiZSgwo
39.	https://www.youtube.com/watch?v=mN7ZFcLd0fk
40.	https://www.youtube.com/watch?v=Vr7IKdDhLBc
41.	https://www.youtube.com/watch?v=oYMqLUqfxwY
42.	https://www.youtube.com/watch?v=kGROOCeAyWM
IV.	@aimusic__12
1.	https://www.youtube.com/watch?v=j7bbN-zhtSc
V.	@vocaltonic-b2u
1.	https://www.youtube.com/watch?v=ilMY2rtA6Gg
VI.	@haideralimirza4
1.	https://www.youtube.com/watch?v=-Xd_fJrGmtE
VII.	@DigitalMasti_AI
1.	https://www.youtube.com/shorts/n1XpElloHZc



VIII.	@BanglaBeatsAI
1.	https://www.youtube.com/shorts/w47KKrECKRU
IX.	@DebzLife
1.	https://www.youtube.com/@DebzLife/shorts
X.	@chhindwarasteddybear
1.	https://www.youtube.com/shorts/4doBcUtYy2w
XI.	@s2devils620
1.	https://www.youtube.com/watch?v=wZlCqVvD06Y
X.	Google Play Store
1.	https://play.google.com/store/apps/details?id=entertainerz.hitkumarsanusongs&pcampaignid=web_share



ANNEXURE C

LIST OF SPECIFIC INFRINGING URLs ON DEFENDANT NO. 7'S PLATFORM **(Instagram):**

<u>S.No.</u>	<u>Link</u>
<u>I.</u>	<u>@sayantanguha_sg</u>
1.	https://www.instagram.com/reel/CvCuTiiLn3G/?igsh=MW9hbVkcDR4ZmJuNg%3D%3D_
2.	https://www.instagram.com/reel/CvCuTiiLn3G/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
3.	https://www.instagram.com/reel/Ct6IkjCNOyC/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
<u>II.</u>	<u>@kumarsanu_world</u>
1.	https://www.instagram.com/p/DOSh0BYEhzw/?igsh=MTd4M2NhaTR0d2Zkag%3D%3D_
2.	https://www.instagram.com/p/DPtwPZnkueg/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
3.	https://www.instagram.com/p/DPtbN_cE4Wr/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
4.	https://www.instagram.com/p/DPtPO9dEkE5/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
5.	https://www.instagram.com/reel/DPtEO8nEiWZ/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
6.	https://www.instagram.com/reel/DPsp9ulD71t/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
7.	https://www.instagram.com/p/DPmA4hgkpBl/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
8.	https://www.instagram.com/reel/DPnvCijkgvo/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
9.	https://www.instagram.com/p/DPg9m0kkoKi/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
10.	https://www.instagram.com/p/DPjg9X8kmC2/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
11.	https://www.instagram.com/reel/DPSlKK4DeFP/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
12.	https://www.instagram.com/p/DPT392XEkTU/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
13.	https://www.instagram.com/p/DPHLeB7kicn/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
14.	https://www.instagram.com/p/DPF3AXKEgEO/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
15.	https://www.instagram.com/p/DOityLrkt_7/?utm_source=ig_web_copy_link_
16.	https://www.instagram.com/p/DOSh0BYEhzw/?utm_source=ig_web_copy_li



	nk&igsh=MzRlODBiNWFlZA%3D%3D_
17.	https://www.instagram.com/p/DOL9btEkhZn/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
18.	https://www.instagram.com/p/DNlHk51yLtg/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
19.	https://www.instagram.com/reel/DLukBrZymiC/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
III.	<u>@ishant creation k</u>
1.	https://www.instagram.com/ishant_creation_k/?igsh=%3DMW12bnh1MmRvZW1yMQ%3D%3D#
2.	https://www.instagram.com/reel/DPrY9-JEeCg/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D%3D%3Bhttps%3A%2F%2Fwww.instagram.com%2Ffeed%2FDPJzWhVCJtD%2F%3Futm_source%3Dig_web_copy_link
3.	https://www.instagram.com/reel/DPlzWhVCJtD/?utm_source=ig_web_copy_link
4.	https://www.instagram.com/reel/DPejC5pDycs/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
5.	https://www.instagram.com/reel/DOu0bf_CG_s/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
6.	https://www.instagram.com/reel/DOtbnaiNod/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
7.	https://www.instagram.com/p/DOX0Blik_TU/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
8.	https://www.instagram.com/p/DNrtYFnXs35/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
9.	https://www.instagram.com/p/DNepqiazLMb/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
10.	https://www.instagram.com/p/DM42IKfvMxk/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
11.	https://www.instagram.com/reel/DMP8kXsIgX4/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA%3D%3D_
IV.	<u>@showbizshowsha</u>
1.	https://www.instagram.com/reel/C-kk2Jdojle/?utm_source=ig_web_copy_link