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

CNR No. DLHC010341732026

+ **CS(COMM) 812/2026**

TABASSUM JAMAL HASHMI

.....Plaintiff

Through: Ms. Swathi Sukumar, Senior Advocate with Mr. Rohan Talwar, Ms. Deeksha Jani, Ms. Preksha Diwakar, Mr. Anirudh Bhatia, Mr. Jinay Jain, Ms. Rishika Aggarwal, Mr. Ritik Raghuwanshi and Mr. Anshu Tulsyan, Advocates.

versus

ASHOK KUMAR & ORS.

.....Defendants

Through: Ms. Mamta Rani Jha, Ms. Shruttima Ehersa, Ms. Aiswarya Debadarshini and Ms. Jahanvi Agarwal, Advocates for D-8/Google LLC. Mr. Varun Pathak, Ms. Radhika Roy and Ms. Ashrika Mehra, Advocates for D-9/Meta Platforms, Inc.

Mr. Deepak Gogia, Mr. Aadhar Nautiyal and Ms. Shiwangi Kohli, Advocates for D-10/X Corp.

Mr. Nitin Sharma, Mr. Angad Singh Makkar and Ms. Brinda Nagaraja, Advocates for D-11/Ebay Inc.

Ms. Surabhi Pande and Mr. Affan Moin, Advocates for D-12/Flipkart Internet Private Limited.

Mr. Ankit Parhar, Mr. Adithya Nair and Ms. Shreya Gupta, Advocates for D-14//Reddit Technologies India Private Limited and 15/Reddit Inc.

Mr. Mrinal Ojha, Mr. Debarshi Dutta and Mr. Nikhil Gupta, Advocates for D-16/GoDaddy.com LLC.

Ms. Kruttika Vijay, Mr. Yash Raj, Ms. Suvarna Singh and Ms. Harshitha Rathod, Advocates for D-17/Hosting Concepts B.V.



CORAM:
HON'BLE MS. JUSTICE JYOTI SINGH

ORDER
06.08.2026

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I.A. 20224/2026 (Exemption)

1. Allowed, subject to all just exceptions.
2. Application stands disposed of.

I.A. 20219/2026 (for pre-institution mediation)

3. This application is filed on behalf of the Plaintiff under Section 151 CPC read with Section 12A of the Commercial Courts Act, 2015 seeking exemption from Pre-Institution Mediation.
4. Having regard to the facts of the present case wherein urgent relief is prayed for and in light of the judgment of Supreme Court in *Yamini Manohar v. T.K.D. Keerthi*, (2024) 5 SCC 815, as also Division Bench of this Court in *Chandra Kishore Chaurasia v. RA Perfumery Works Private Ltd.*, 2022 SCC OnLine Del 3529, exemption is granted to the Plaintiff from Pre-Institution Mediation.
5. Application is allowed and disposed of.

I.A. 20220/2026 (u/S 80(2) r/w Section 151 CPC)

6. This application is filed on behalf of the Plaintiff seeking exemption from serving two months' advance notice to Defendants No. 24/MeitY and 25/DoT under Section 80 CPC.
7. For the reasons stated in the application, the same is allowed, exempting the Plaintiff from serving two months' advance notice to Defendants No. 24 and 25 under Section 80 CPC.
8. Application stands disposed of.



I.A.20218/2026 (u/O XI Rules 1, 3 and 5 r/w Section 151 CPC)

9. This application is filed on behalf of the Plaintiff seeking discovery, production and inspection of Defendants' documents.

10. Issue notice.

11. Counsels, as above, accept notice on behalf of the respective Defendants.

12. Notice be issued to remaining Defendants through all permissible modes, returnable before Court on 07.12.2026.

I.A. 20221/2026 (u/O XI Rule 1 (4) r/w Section 151 CPC)

13. This application is filed on behalf of the Plaintiff seeking to place on record additional documents within 30 days.

14. Plaintiff, if she wishes to file additional documents at a later stage, shall do so strictly in accordance with provisions of the Commercial Courts Act, 2015.

15. Application is allowed and disposed of.

I.A. 20222/2026 (u/S 151 CPC)

16. This application is filed on behalf of the Plaintiff seeking time of four weeks for filing the required Certificate under Section 63(4)(c) of the Bharatiya Sakshya Adhiniyam, 2023 read with Order XI Rule 6(iii) CPC.

17. For the reasons stated in the application, the same is allowed granting four weeks to the Plaintiff to file the required Certificate under Section 63(4)(c) of the Bharatiya Sakshya Adhiniyam, 2023 read with Order XI Rule 6(iii) CPC.

18. Application stands disposed of.

I.A. 20223/2026 (u/S 151 CPC)

19. This application is filed on behalf of the Plaintiff seeking permission



to file lengthy list of dates and synopsis.

20. For the reasons stated in the application, the same is allowed. List of dates and synopsis are taken on record.

21. Application stands disposed of.

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22. Let plaint be registered as a suit.

23. At the outset, on objection being raised by counsels for Defendants No.14 and 15, learned Senior counsel for the Plaintiff prays for deletion of Defendant No.14. Let amended memo of parties be filed within two weeks from today.

24. Issue summons.

25. Learned counsels, as above, accept summons on behalf of the respective Defendants.

26. Upon filing of process fee, summons be issued to remaining Defendants through all permissible modes, returnable the learned Joint Registrar on 08.09.2026.

27. Summons shall state that the written statements shall be filed by the remaining Defendants within 30 days from the date of receipt of summons along with affidavits of admission/denial of the documents filed by the Plaintiff.

28. It will be open to the Plaintiff to file replications within 30 days from receipt of the written statements along with affidavits of admission/denial of documents filed by the remaining Defendants.

29. If any of the parties wish to seek inspection of any documents, the same be sought and given within the timeline prescribed in Delhi High Court (Original Side) Rules, 2018.



30. Learned Joint Registrar shall carry out admission/denial of documents and marking of exhibits.

I.A.20217/2026 (u/O XXXIX Rules 1 and 2 r/w Section 151 CPC)

31. This application is filed on behalf of the Plaintiff under Order XXXIX Rules 1 and 2 read with Section 151 of CPC for grant of *ex parte* ad interim injunction.

32. Issue notice.

33. Learned counsels, as above, accept notice on behalf of the respective Defendants.

34. Notice be issued to remaining Defendants through all permissible modes, returnable Court on 07.12.2026.

35. Case of the Plaintiff as set out in the plaint is that Plaintiff is a world-renowned actress and performer and well-respected and recognised public figure with over three decades of experience in the Film Industry, both in India and internationally. Plaintiff commenced her journey as an actor in 1985 at the age of 14 in ‘*Hum Naujawan*’ and in 1994 she was awarded Filmfare Award for Best Female Debut for her performance in ‘*Vijaypath*’. Plaintiff has immensely contributed to Indian Cinema with early path breaking performances in movies such as ‘*Maachis*’ (1996) as also ‘*Chandni Bar*’ (2001), for which she was awarded her second National Film Award for Best Actress. Plaintiff has continued to earn critical and commercial success owing to her versatile portrayals in ‘*Virasat*’ (1997), ‘*Hu Tu Tu*’ (1999) and ‘*Astitva*’ (2000), all of which won her Filmfare Critics’ Awards. In 2003, Plaintiff starred in an adaptation of William Shakespeare’s Macbeth titled ‘*Maqbool*’, which premiered at the 2003 Toronto International Film Festival and her performance was internationally acclaimed.



36. It is stated that Plaintiff earned the Filmfare Critics Award for Best Actress for distinguished performance in '*Cheeni Kum*' (2007). Plaintiff collaborated with Vishal Bhardwaj in '*Haider*' (2014), which garnered widespread praise for her performance. For her brilliant performance in '*Andhadhun*' (2019), Plaintiff was awarded the best actress award in Indian Film Festival at Melbourne. Plaintiff has earned a distinct and unique reputation for delivering socially important cinema aimed at bringing positive social changes and is viewed as a powerful female persona who has helmed some of the most important ventures in Indian and international cinema. Beyond critically recognized films, Plaintiff repertoire also straddles some of the most commercially successful movies such as '*Border*' (1997), which depicted real life events surrounding the Battle of Longewala during the Indo-Pak war of 1971 and this was the second highest-grossing Indian film of 1997. Plaintiff's string of commercially successful ventures continued with immensely popular portrayals in '*Chachi 420*', the cult film, '*Hum Saath-Saath Hain*' as also popular comedies such as '*Biwi No.1*', '*Hera Pheri*' etc. The versatility in Plaintiff's performances is best depicted in the movie '*Fanaa*', where she played a role of a RAW Agent as also her double role in '*Bhool Bhulaiyaa 2*' followed by performance in '*Drishyam 2*'. The journey of success continued and her movie '*Crew*' in 2024 was a blockbuster success.

37. It is stated that Plaintiff's acting skills are not restricted to Hindi film industry and she has given inimitable performances in Southern cinema also, right from her debut in Telugu cinema in '*Coolie No.1*', a major box office success, followed by her acting in '*Ninne Pelladutha*', the highest grossing Telugu film at the time of its release. Plaintiff also enjoys a unique global



stardom, having acted in movies '*Life of Pi*', which won four Academy Awards (Oscars) and one Golden Globe Award. Plaintiff also performed in British television drama miniseries '*A Suitable Boy*' (2020), which was premiered on BBC One and later released internationally on Netflix.

38. As detailed in paragraph 17 of the plaint, Plaintiff has received several laurels and prestigious awards including Padma Shri in 2011 for her contribution towards the art of cinema; two National Awards for Best Actress; seven Filmfare Awards with a record of five awards for Best Actress by Critics' choice; two Filmfare Awards (South); two IIFA Awards; four Zee Cine Awards; four Screen Awards; two Producers Guild Film Awards; award by the Alliance of Women Film Journalists, New York (2007) for '*The Namesake*' and the Smita Patil Memorial Award. At the 17th Indian Film Festival of Los Angeles (2019), Plaintiff was honoured with the 'Opening Night Tribute'.

39. It is stated that owing to her trailblazing performances, Plaintiff has established exceptional goodwill and reputation across the world and has associated herself with several movies having a deep-rooted societal message and impact, such as '*Maachis*', '*Chandni Bar*' and '*Haider*', thereby earning a distinct nature of trust and faith amongst audiences, who view her as a responsible and trustworthy public figure. Plaintiff has a fan following running into millions in India as also overseas and on Instagram alone she has 3.2 million followers.

40. It is stated that Plaintiff's name, image, voice and other facets of her personality carry immense goodwill and commercial value and Plaintiff's endorsement is treated as a mark of trust and a source identifier by the public at large, allowing Plaintiff to enter into various commercial



endorsement deals. Plaintiff has been associated as brand ambassador with several known brands including ICICI Bank in its campaign against cyber-crime and fraud, which garnered over 40 million views online, Vaseline and LUX for skincare, Samsung for home appliances, Audible and Tetra Pak and has also lent her voice for Google Pay, showcasing her versatility across finance, technology, personal care and food and beverages. Owing to the reputation garnered overseas and in India and the credibility attached to her, Plaintiff's real name and moniker/stage name 'Tabu', image, voice and other attributes of her persona have acquired a unique distinctiveness and consequently, immense commercial value and Plaintiff enjoys exclusive rights to use them and protect their exploitation. Name/image/voice/likeness are attributes of personality/publicity rights and cannot be misappropriated or used or exploited by third parties without the consent or authorization of the Plaintiff. The moniker/stage name 'Tabu' and the name 'Tabassum Jamal Hashmi' also have a statutory protection under Section 2(m) of the Trade Marks Act, 1999 ('1999 Act'), since the definition of 'mark' includes name. For protecting her proprietary rights in the name, identity and associated *indicia*, Plaintiff has applied for trademark registrations spanning wide range of classes covering goods and services, including consumer products, apparels, accessories, entertainment services, advertising, digital content and allied commercial activities. The non-exhaustive list in paragraph 35 of the plaint includes the wordmark TABU, for which application was made on 14.11.2024 in Classes 18 and 20 is as follows:-



MARK	DATE OF APPLICATION	CLASS AND SPECIFICATION	STATUS
TABU	14.11.2024	Class 18, Wordmark (leather and leather imitations etc.)	Accepted
TABU	14.11.2024	Class 20, Wordmark (furniture, mirrors, picture frames etc.)	Accepted

41. It is stated that the public at large associates the physical appearance, image, voice and other attributes of Plaintiff's personality instantly with her and no one else and to protect the rights accruing under the 1999 Act and the Copyright Act, 1957 as also personality and publicity rights, Plaintiff has filed the present suit. Plaintiff avers that Defendant No.1/Ashok Kumar is an unknown person, who operates an account '@celebritymanagerpratikmehta' on Defendant No.9's platform, which unauthorizedly offers bookings for Plaintiff's appearances/performances for events, using her name, images and video clips of her performances etc. The handle has around 2000 followers and is designed to falsely represent an association or involvement of the Plaintiff, whereas Plaintiff has no association whatsoever with the handle.

42. It is stated that Defendant No.2 *inter alia* publishes online publication 'India Herald' accessible at <https://www.indiaherald.com/>, which carries a completely false and fabricated article on an alleged malicious statement, purportedly made by the Plaintiff and despite a public clarification by Plaintiff's official team to leading and reputed newspaper publication, the publication has not been removed and for the sake of reference and on insistence of the senior counsel, the derogatory statement is extracted below, in order to caution other parties from dissemination:-

"81. These publications all state that the Plaintiff has claimed that "she



doesn't want to marry, and just wants a man in bed". Such a statement has never been made in any context by the Plaintiff. The sole purpose of circulating this grossly defamatory and malicious content is to garner views for the tabloids which have published this content. The fake news was deliberately sensationalised with sole objective of monetising and capitalising on the immense goodwill and reputation associated with the Plaintiff and is an exercise in character assassination. Quite apart from being defamatory, these publications also have the effect of outraging the Plaintiff's modesty. The Plaintiff has been targeted by the various tabloids arrayed as Defendants herein, only with an intention to gain traction at the cost of her dignity."

43. It is stated that Defendant No.3 is Ice Poster operating the website <https://www.iceposter.com/>, which offers for sale and sells products such as mugs, posters, calendars and clothing including hoodies, sweatshirts etc. with Plaintiff's photographs and further enables users to add her photographs to various products. Defendants No. 4 to 7 operate different websites and are selling wallpapers with photographs of the Plaintiff, unauthorizedly.

44. Learned Senior counsel for the Plaintiff submits that Defendant No.2 has published a false and denigrating statement, which was never made by the Plaintiff. The sole purpose of circulating this grossly malicious content is to garner views for the tabloids which have published the content and the news was deliberately sensationalized with the objective of monetizing and capitalizing on the immense goodwill and reputation associated with the Plaintiff. Quite apart from being defamatory, publications have the effect of virtually outraging Plaintiff's modesty. Despite clarificatory statement by the Plaintiff to all leading newspapers that no such statement was made by her, Defendant No.2 continues to publish such statement. Being a well known public figure, Plaintiff derives substantial commercial value from her reputation and goodwill and the false and disparaging imputation, is causing



irreparable damage to the reputation of the Plaintiff besides loss of existing and prospective endorsement contracts and dilution of the brand equity.

45. It is further submitted that Plaintiff has come across AI-generated obscene images/videos, designed to attract viewership through sensationalism and prurience and is causing grave injury to Plaintiff's reputation in the society. Some of these videos, images and GIFs circulated online consist of manipulated and edited excerpts from Plaintiff's films, interviews and public appearances, which have been altered to depict the content in an obscene manner. Some of the movie scenes have been specially edited by zooming in and slowing down the frame rate to focus and highlight specific parts of intimate scenes to attract viewers and make unlawful gain and in the bargain, Plaintiff is shown in bad light. The obscene infringing content is being disseminated on various social media platforms and an irreversible damage is being caused to Plaintiff's goodwill.

46. Ms. Swathi Sukumar, argues that the third category of infringement in the present case relates to sale of merchandise using Plaintiff's personality attributes such as her image and photographs, unauthorizedly and for unlawful commercial gains. Defendant No.3 uses Plaintiff's image for selling merchandise such as mugs, posters, calendars and clothing including hoodies, sweatshirts etc. and Defendants No.4 to 7 sell wallpapers using her image to establish a commercial nexus and/or endorsements, without Plaintiff's consent or authorization. Defendant No.1 operates an account '@celebritymanagerpratikmehta' on Instagram and unauthorizedly offers bookings for Plaintiff's appearance and performance, of which she has no knowledge and to which she has never consented. Plaintiff has no association with the handle and has never authorized anyone to make these



bookings. Clearly, Defendant No.1 is unlawfully monetizing Plaintiff's personality attributes and diluting her commercial value.

47. Having heard learned Senior Counsel for the Plaintiff and upon perusal of the screenshots and other impugned content, I am of the view that Plaintiff has made out a prima facie for grant of *ex parte* ad interim injunction against the Defendants. Balance of convenience lies in favour of the Plaintiff and she is likely to suffer irreparable harm in case the interim injunction, as prayed for, is not granted.

48. Plaintiff is a world renowned and critically acclaimed and a celebrated actress, who has left a mark in the film industry, both in India and internationally, with her stellar performances over three decades. With her debut in the film industry at the age of 14 from the movie '*Hum Naujawan*', Plaintiff can boast of being a prominent part of numerable blockbusters and commercially successful movies. Owing to her versatile acting skills, she was offered myriad of roles and many prestigious awards such as the Padma Shri in 2011 and two National Awards for Best Actress, were bestowed on her due to exceptional performances, which have also left an indelible mark not only in India but across borders. Plaintiff acted in '*Life of Pi*', which won four Academy Awards and one Golden Globe Award. The sheer reach and versatility of Plaintiff's performances have made her a household name across the country and exceptional goodwill and reputation attaches to her persona.

49. There is no gainsaying that Plaintiff's name and moniker/stage name 'Tabu' and her image, voice, likeness and other attributes of her personality have acquired unique distinctiveness and are associated with her instantly by members of public. Plaintiff has a right to protect her personality rights and



consequentially to restrain third parties from using, misappropriating and/or exploiting in any manner, without her consent and authorization, the personality attributes. Personality rights have been recognised and protected by this Court in several orders passed from time to time. In ***D.M. Entertainment v. Baby Gift House, 2010 SCC OnLine Del 4790; Anil Kapoor v. Simply Life India, 2023 SCC Online Del 6914; and Jaikishan Kakubhai Saraf v. Peppy Store, 2024 SCC OnLine Del 3664***, this Court has consistently held that unauthorised use of person's name, image or other distinctive attributes for commercial purposes constitutes an infringement of his rights, amounts to dilution of individual's unique identity and leads to unearned commercial gain by others. It is well settled that where such personality rights are established, the individual is entitled to protection by way of injunction against their unauthorised use or exploitation. When attributes of famous personalities are used unauthorisedly, it leads not only to commercial detriment but also impacts his/her right to privacy/personality and live with dignity. Plaintiff is entitled to protection against publications, which are disparaging and denigrating as also those which reflect false endorsements on merchandise etc. Plaintiff is right in contending that uploading and dissemination of AI-generated videos containing deliberately edited content of movies or public appearances or interviews, to sensationalize and divert traffic on the websites for monetary gains, is causing irreparable harm to the goodwill, reputation and commercial value attached to the brand endorsements by her. The statement published by Defendant No.2, extracted in the earlier part of the order, which has been categorically denied by the Plaintiff, is an egregious act on behalf of the publisher and as rightly flagged, has caused immense harm to Plaintiff's



reputation and is violating her right to live with dignity. It is indeed concerning that despite a categorical denial by the Plaintiff to various newspapers, Defendant No.2 is continuing with the publication and the obvious intent to sensationalise and earn money.

50. Accordingly, till the next date of hearing:-

- (a) Defendants No.1 to 7 including John Does and all others acting on their behalf are restrained from using, exploiting, misappropriating any attribute of Plaintiff's personality/publicity rights such as: (i) moniker/stage name 'Tabu' and/or her name 'Tabassum Jamal Hashmi' and/or any other acronyms or attributes of her name or her initials; (ii) voice recordings and duplications; (iii) signatures/initials; (iv) images; and (v) photographs and movie stills, in any manner whatsoever, including but not limited to publication of disparaging statements, for brand endorsements and sale of merchandise etc., for personal or commercial gains, without the consent and/or authorization of the Plaintiff, through the use of any technology including but not limited to Artificial Intelligence, Generative Artificial Intelligence, Machine Learning, Deep-Fakes, Face Morphing and Graphic Interchange Formats (GIFs) and on any medium or format, including but not limited to the physical medium and the virtual medium such as websites, mobile apps, Metaverse, social media etc. or otherwise;
- (b) Defendant No.2 is restrained from circulating/disseminating the statement referred to in paragraph 81 of the plaint and extracted hereinabove and is directed to delete and/or take down the same from all its platforms, within a period of three days from the date of receipt



of copy of this order;

- (c) Defendant No.8/Google LLC shall take down, remove and disable URLs enlisted at Serial Nos.1-21 in Document-A; URLs at Serial Nos.1-8 of Document-B (page 89 of annexure with the plaint); and URLs at Serial Nos.1-5 of Document-B (page 91 of annexure with the plaint), all part of **Annexure-A** to this order, within a period of 36 hours from the date of receipt of copy of this order;
- (d) Defendant No.9/Meta Platforms, Inc. shall take down, remove and disable URLs enlisted at Serial Nos.1-73 in Document-A; URLs at Serial Nos.1-28 in Document-B; and URLs at Serial Nos.1-5 in Document-C, of **Annexure-A** to this order, within a period of 36 hours from the date of receipt of copy of this order;
- (e) Defendant No.10/X Corp. shall take down URLs enlisted at Serial Nos.3, 5 and 6 in Document-A of **Annexure-A** to this order and Defendant No.11/Ebay Inc. shall take down URLs enlisted in Serial Nos.15-20 in Document-C of **Annexure-A**, within a period of 36 hours from the date of receipt of copy of this order;
- (f) Defendants No. 15/Reddit Inc. shall take down URL at Serial No.1 in Document-A and URLs at Serial Nos.1, 3 to 7 in Document-B of **Annexure-A**, within a period of 36 hours from the date of receipt of copy of this order;
- (g) Defendant No.16/GoDaddy.com LLC shall lock and suspend domains www.spideyposts.com at Serial Nos.1 to 3 of Document-B of **Annexure-A** to this order as also domains www.mazaindia.com at Serial Nos.1 and 2 in Document-C of **Annexure-A**, within a period of 36 hours from the date of receipt of copy of this order;



- (h) Defendant No.17/Hosting Concepts B.V. shall lock and suspend the domain <https://idposter.com>, within a period of 36 hours from the date of receipt of copy of this order; and
- (i) Defendants No. 8 to 10 and 15 and 16 shall disclose Basic Subscriber Information and IP log details, as the case may be, to the Plaintiff, within three weeks from today.
51. Plaintiff shall comply with the provisions of Order XXXIX Rule 3 CPC within a period of two weeks from today.

JYOTI SINGH, J

AUGUST 6, 2026
S.Sharma

**ANNEXURE-A****Document-A**

SR. NO.	LINKS
DEFENDANT NO. 2/INDIA HERALD PUBLISHERS PRIVATE LIMITED	
1.	https://www.indiaherald.com/Breaking/Read/994782472/Dont-Need-to-Marry-Just-Want-a-Man-in-Bed
DEFENDANT NO. 8/GOOGLE LLC	
1.	https://youtube.com/shorts/G7DiCb2yS34?si=z-WRqWaiZTCIvmb7
2.	https://youtube.com/shorts/JbNXzwJQSnY?si=utEShh9wtZzqzwTG
3.	https://youtube.com/shorts/3obIMVZJNCQ?si=oc6euF_JMGcfYm1o
4.	https://youtube.com/shorts/kDtary0Df-E?si=Nh9Tp2QFbF-U3jFV
5.	https://youtube.com/shorts/YjiEd_7lPeY?si=sTqDgVLXAvUvAtbC
6.	https://youtube.com/shorts/Zt3Q_w06te0?si=rm4IJ_0ToyCR2w5v
7.	https://youtube.com/shorts/uxSoAEcVoR4?si=9ykiYle5iDsyofUC
8.	https://youtube.com/shorts/pK8KZxBpfXA?si=v8vQBDcwpafzqNqU
9.	https://youtube.com/shorts/TAKkNFzDep4?si=iOtx6Akn6uFXbP5L
10.	https://youtube.com/shorts/Fn7gjD_jHiM?si=gnMWsZwExluUDzSF
11.	https://youtube.com/shorts/sQN2RsPu2zc?si=6vhLKFz1cuIOilGq
12.	https://www.youtube.com/shorts/tv2YdJssjJY?si=CrZMB3TMgNru8Uto
13.	https://www.youtube.com/shorts/-vKwY4OxZzc
14.	https://www.youtube.com/shorts/Pb4fSmNMbng?si=5WPQ3eQZsLAvdNTE
15.	https://www.youtube.com/shorts/B6jZ1mheCCE
16.	https://www.youtube.com/shorts/ZLKGUoQph6k
17.	https://www.youtube.com/shorts/cWH7rrn82cc
18.	https://www.youtube.com/shorts/atThl_gkgYI
19.	https://www.youtube.com/shorts/f_PUsL3hdD8
20.	https://youtu.be/VuUsyCd60KI?si=lCvWQn895g9o3EgR
21.	https://youtube.com/shorts/-vKwY4OxZzc?si=Clu2yOsxMxU8qxmO
DEFENDANT NO. 9/META	
1.	https://www.facebook.com/Scoopwhoop/posts/bollywood-actress-tabu-has-once-again-impressed-fans-with-her-honest-and-bold-th/1379989640828278/
2.	https://www.facebook.com/timesapplaudtrends/posts/tabui-only-need-a-man-in-mybed-i-dont-want-to-get-married-i-am-happy-being-sing/1504697974995586/
3.	https://www.facebook.com/SushantArmy/posts/i-only-need-a-man-to-sleep-in-bednothing-else-i-like-being-single-i-dont-like-g/1414110977019736/



4.	https://www.facebook.com/Filmelon/posts/-i-only-need-a-man-to-sleep-in-bednothing-else-i-like-being-single-so-i-dont-li/1543665870688799/
5.	https://www.facebook.com/jaimatadee23/posts/at-52-ive-understood-that-myindependence-is-something-i-will-never-compromise-o/1028071643176178/
6.	https://www.instagram.com/p/DTpybpCCXgp/?igsh=MWpkcTVjdDBoOW1rNg==
7.	https://www.facebook.com/61558565256784/posts/i-only-need-a-man-to-sleep-inbed-nothing-else-i-like-being-single-i-dont-like-g/122214236852285508/
8.	https://www.facebook.com/Filmelon/posts/-i-only-need-a-man-to-sleep-in-bednothing-else-i-like-being-single-so-i-dont-li/1476765237378863/
9.	https://www.facebook.com/pinkvillamedia/videos/tabu-on-single-life-at-52-whatshe-actually-said-about-being-single/1398352888497028/
10.	https://www.facebook.com/pacckup/posts/i-only-need-a-man-to-sleep-in-bed-idont-like-getting-married-now-im-enjoying-my/1290178243131607/
11.	https://www.facebook.com/61577196277809/videos/i-only-need-a-man-in-bedtabus-bold-confession-shocks-the-internet-tabu-ajaydevg/1204143701897242/
12.	https://www.facebook.com/missmaliniblog/posts/i-like-being-single-i-dont-likegetting-married-now-im-enjoying-my-work-single-l/1423903745765944/
13.	https://www.facebook.com/WeThought4U/posts/tabus-statement-about-remainingsingle-even-at-the-age-of-54/894984973042747/
14.	https://www.facebook.com/MediaMicTollywood/posts/tabus-bold-statement-istrending-as-she-says-she-loves-her-single-life-and-doesn/1430603855339831/
15.	https://www.facebook.com/mopays/posts/bollywood-actress-tabu-has-opened-upabout-being-single-at-52-saying-she-loves-h/1310345797796082/
16.	https://www.facebook.com/themews.in/posts/veteran-bollywood-actress-tabu-hasonce-again-sparked-discussion-with-her-candid/917772653983261/
17.	https://www.instagram.com/p/DXltJShjISR/
18.	https://www.instagram.com/p/DTmcSLLkl-d/?igsh=MWdiNG15NjBqb3plcA==
19.	https://www.instagram.com/p/DTu8S6-lfG/?igsh=NTJoOHFsOTh6cnZv
20.	https://www.instagram.com/p/DTpUn6TE3Mp/?igsh=YnpubzlhbzFnNTc4
21.	https://www.instagram.com/p/DTu3h5pEiTX/?igsh=NmJxOTEyZDdla2d6
22.	https://www.instagram.com/p/DTu4jIOk5xr/?igsh=Mml4MWRyMDI5bnE3
23.	https://www.instagram.com/p/DTsjIjukmOb/?igsh=MW8zZWw3dGM2NWU4ZA==
24.	https://www.instagram.com/p/DTnFLnwK4Dh/?igsh=dmhrMHA0aDUycmp0
25.	https://www.instagram.com/reel/DE1dztKvSe8/?igsh=b3M3MGRldWdmdGli
26.	https://www.instagram.com/p/DTwny8tiMLX/?igsh=MTI5ejZsYzB3d3F2bg==
27.	https://www.instagram.com/p/DLFQC5VxUru/?igsh=dmxyCHRzb2tjZTZt
28.	https://www.instagram.com/p/DKwNSV2yVCx/?igsh=anlta2ZibGpxd2E0
29.	https://www.instagram.com/p/DKtMIqnOfhy/?igsh=MWdhMjluNGRtYWJ5ZQ==
30.	https://www.instagram.com/p/DTsWHJZEec-/igsh=MW1mZzhoN3hseXo4bg==
31.	https://www.instagram.com/p/DTka7DMEVLZ/?igsh=MWJ1NnZmODkxcDNqZQ==
32.	https://www.instagram.com/reel/DTsgf12jPzJ/?igsh=b2lIdjdwdmhsNnU3
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34.	https://www.instagram.com/p/DTpVszYkbG_/?igsh=MXQxY2x4MGlrbnN2bA==
35.	https://www.instagram.com/p/DTpNAIjCbdJ/?igsh=bHE3enYwY29vcndx
36.	https://www.instagram.com/p/DTruhCbK3Rp/?igsh=MXJ6NjNjY2N2ZG13aQ==
37.	https://www.instagram.com/p/DTqKI5TCZJc/?igsh=a3o2c3g0dmM3Nmtt
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39.	https://www.instagram.com/p/DTj9rJMkZvL/?igsh=MWRpd3FlbTBkdzlvOQ==
40.	https://www.instagram.com/p/DTnYj_pCY3I/?igsh=MXVycmVkeDI4aGpkcg==
41.	https://www.instagram.com/p/DTpZLBgkgCH/?igsh=MTY0azQ4ODNpNG9iMA==
42.	https://www.instagram.com/p/DTsCE5lDNNa/?igsh=bzY5MHJxNTN2OXMy
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45.	https://www.instagram.com/p/DTrg3vxka_m/?igsh=MXF1cmduYjRtbHlieQ==
46.	https://www.instagram.com/p/DTsRgKEjb_B/?igsh=ZndpdmRuMWYwZDN3
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48.	https://www.instagram.com/p/DTsWHJZEec-/?igsh=eTMyNHAXZDVrbWRr
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50.	https://www.instagram.com/p/DTmjpgkDz-T/?igsh=Yjk0dzlxbnA2b2to
51.	https://www.instagram.com/p/DTpybpCCXgp/?igsh=MWpkcTVjdDBoOW1rNg==
52.	https://www.instagram.com/p/DTuW2W7CSTe/?igsh=MWszdXhhcGo0Zjd0
53.	https://www.instagram.com/p/DTsukz1DH8S/?igsh=MXJ6d2t3eXMxbTl0Zw==
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58.	https://www.instagram.com/p/DTzTZ_xD82O/?igsh=bHRnczI5Nm40OWZn
59.	https://www.instagram.com/p/DT45ljSEtc/?igsh=MWhua2c2ZGxhZnpkbA==
60.	https://www.instagram.com/p/DTueQOYCVkk/?igsh=NzZyYzRiOGhhazYx
61.	https://www.instagram.com/p/DTu124xkyWt/?igsh=YWJjNGhzMDFrOXhv
62.	https://www.instagram.com/p/DTuk7pWku9s/?igsh=cWlmOHnqajVvYzVx
63.	https://www.instagram.com/p/DTpk658kwTh/?igsh=Z3BscXd3YWM0ZjZw
64.	https://www.instagram.com/p/DTplxRdCXfD/?igsh=MTMwN2R2OWM4NTg3dQ==
65.	https://www.instagram.com/p/DTpUXQoDN1D/?igsh=b2NrYzczeW5pYnc=
66.	https://www.instagram.com/p/DTpybpCCXgp/?igsh=MWpkcTVjdDBoOW1rNg==
67.	https://www.instagram.com/p/DTmcSLLkl-d/?igsh=MWdiNG15NjBqb3plcA==
68.	https://www.instagram.com/p/DTu8S6-ILfG/?igsh=NTJoOHFsOTh6cnZv
69.	https://www.instagram.com/p/DTrqLe-iSYP/?igsh=MW5sa2djaG93M29laA==
70.	https://www.instagram.com/p/DTpUn6TE3Mp/?igsh=YnpubzlhbzFnNTc4



71.	https://www.instagram.com/p/DTu3h5pEiTX/?igsh=NmJxOTEyZDdla2d6
72.	https://www.instagram.com/p/DTsjIjukmOb/?igsh=MW8zZWw3dGM2NWU4ZA==
73.	https://www.instagram.com/p/DTu4jIOk5xr/?igsh=Mml4MWRyMDl5bnE3
DEFENDANT NO. 10/X (TWITTER)	
1.	https://x.com/TrendxNow/status/2013215462621065358
2.	https://x.com/Chrissuccess/status/2013101714082050547
3.	https://x.com/realsiff/status/1880548554084647120?s=20
DEFENDANT NO. 15/REDDIT INC.	
1.	https://www.reddit.com/r/BollyBlindsNGossip/comments/1i3ftmr/tabu_about_being_single/
2.	https://www.reddit.com/r/BollyBlindsNGossip/comments/123xqdj/old_report_tabu_and_nagarjuna_everyone_knows/
3.	https://www.reddit.com/r/BollyBlindsNGossip/comments/1jb5h8x/abhishek_tabu_from_a_holi_party_in_2005_during/
4.	https://www.reddit.com/r/BollyBlindsNGossip/comments/1oebntx/tabu_and_upen_patel/
5.	https://www.reddit.com/r/BollyBlindsNGossip/comments/162dguo/tabu_and_ajay_are_dating/
6.	https://www.reddit.com/r/BollyBlindsNGossip/comments/1l4pmd/tabu_and_nagarjuna_akkineni/
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Document-B

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DEFENDANT NO. 8/GOOGLE LLC	
1.	https://www.youtube.com/watch?v=HuVuJOSjIs&list=PLaqumglxPgSDp4m446kKzy20iyEVSnrBE&index=10
2.	https://www.youtube.com/watch?v=4aQ7hrKJVvs&list=PLaqumglxPgSDp4m446kKzy20iyEVSnrBE&index=35 (aged restricted)
3.	https://www.youtube.com/watch?v=ChKjc5cNIWQ&list=PLaqumglxPgSDp4m446kKzy20iyEVSnrBE&index=31 (age restricted)
4.	https://www.youtube.com/watch?v=AF6Qc6yU5K0&list=PLaqumglxPgSDp4m446kKzy20iyEVSnrBE&index=56
5.	https://www.youtube.com/watch?v=GZ9nzVng5_8
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7.	https://youtu.be/kb77Q_mDKu0?si=Z2SAxu8W2UMw-84X
8.	https://www.youtube.com/watch?v=ka1kpBNWauc&list=PLaqumglxPgSDp4m446kKzy20iyEVSnrBE&index=15
9.	https://youtu.be/fn-swVHkFTE?si=0BIRqsVgW2H-Pmmx
<i>Links of domains owned by DEFENDANT NO. 8/GOOGLE LLC and registered with DEFENDANT NO. 19/MARKMONITOR</i>	
10.	https://tenor.com/view/tabu-actress-gif-19716282
11.	https://tenor.com/view/tabu-andhadhun-alina-hindi-gif-7272930225555311981
12.	https://actressgif.blogspot.com/2015/05/tabu.html
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DEFENDANT NO. 9/META	
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2.	https://www.facebook.com/photo/?fbid=122224702136272978&set=g.474849700340719
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9.	https://www.facebook.com/100057753275801/posts/the-bollywood-queen-tabuimage-created-by-meta-aisouthcinema-cinemamagic-bollywo/1378421534092943/
10.	https://www.facebook.com/groups/1022911975571638/posts/1375689313627234/
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13.	https://www.facebook.com/filmsNactors/posts/photo-challenge-tabukajol/1035843435228200/
14.	https://www.facebook.com/insidemoviesofficial/posts/tabu-hot-photoshoot-tabusexy-model-bikini-hotgirl-hotpics-hotshot-bollywood-bol/633199656345267/
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18.	https://www.instagram.com/p/CkfmT6up25s/
19.	https://www.instagram.com/reels/DEcEMJLtLLV/
20.	https://www.instagram.com/p/BclyVkhFRgl/
21.	https://www.instagram.com/p/C3utO87yxLh/
22.	https://www.instagram.com/p/C8FDY3tMNeX/
23.	https://www.instagram.com/p/C-DuWIRMx3S/
24.	https://www.instagram.com/p/C8jl1vIBPQ8h/
25.	https://www.instagram.com/p/C86LzSnBUQ1/
26.	https://www.instagram.com/p/CN6vHiIH6eX/
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DEFENDANT NO. 13/PINTEREST	
1.	https://pin.it/QB6urv4Pw
2.	https://pin.it/3pVrTDRzw
3.	https://pin.it/60G8CiqxN
4.	https://in.pinterest.com/pin/288934132364051969/
5.	https://in.pinterest.com/pin/71705819062790896/
6.	https://in.pinterest.com/deepak19sarabjeet/tabhu/
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DEFENDANTS NO. 14 AND 15/REDDIT	
1.	https://www.reddit.com/r/bollywoodmasalaa/comments/123zfax/tabu_navel/
2.	https://www.reddit.com/r/IndianCelebHotScenes/comments/wdhjza/tabu_being_fucked/



3.	https://www.reddit.com/r/bollywoodmemes/comments/1e4r12u/wtf_tabu/
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DEFENDANT NO. 16/GODADDY	
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2.	https://www.spideyposts.com/2024/03/cew-naina-hot-video-kareena-kriti- tabu.html
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DEFENDANT NO. 3/ICEPOSTER	
Sr. No.	Links
1.	https://www.iceposter.com/posters/Mira_Nair/G215308_Mira_Nair_Tabu_hoodie.html?_cf_chl_tk=HiOo9crtBmcv_j78yERwktRmrsKHBUN6mFrZgQB96M-1778193298-1.0.1.1-GH55RagcIGt0bJG_7NnEgFIq837H6l2qG3pM_zigRc
2.	https://www.iceposter.com/posters/Tabu/G3430874-tabu_stickers.html
3.	https://www.iceposter.com/posters/Tabu/G3430874-tabu_sweatshirt.html
4.	https://www.iceposter.com/posters/Mira_Nair/G215305_Mira_Nair_Tabu_mug.html
5.	https://www.iceposter.com/posters/Mira_Nair/G215305_Mira_Nair_Tabu_calendar.html
6.	https://www.iceposter.com/posters/Mira_Nair/G215305_Mira_Nair_Tabu_totebag.html
7.	https://www.iceposter.com/posters/Mira_Nair/G215305_Mira_Nair_Tabu_phonecase.html
8.	https://www.iceposter.com/posters/Tabu/G3430873-tabu_pillow.html
9.	https://www.iceposter.com/posters/Tabu/G3430873-tabu_tote-bag.html
10.	https://www.iceposter.com/posters/Tabu/G3430873-tabu_phone-case.html
11.	https://www.iceposter.com/posters/Tabu/G3430873-tabu_tank-top.html
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DEFENDANT NO. 11/EBAY	
1.	https://www.ebay.com/itm/185581701955#:~:text=Tabu,Magazine
2.	https://www.ebay.com/itm/397108134412?_skw=Tabu&itmmeta=01KBGARM3W461CNPQ279PXWPHR&hash=item5c757d420c:g:kWgAAOSwrtJk70MH&itmprp=enc%3AAQAKAAAA4FkkgFvd1GGDu0w3yXCmilc%2F6vi3r0%2BXFDPvo98oITWxKa7LUjc3mTIPd9TvcDsIP%2B5iDI2dCQj1gDJHgwZ1ginHo0v%2Bp3HWF09cgYZHGskH%2BRw1xSQR%2BWx5J9ijFf99K6xc6ihjcbg7W62CSCA%2BRqIRQF9UCN%2BIsOwLON5XGVz7gxIwfcWpMbdhwc6YD2bE4CxxcXZ8UY%2FIKOYZ%2BUUpxfQK7kmu6Z0Jspq95ZeHjPYI2ZYBKmC4UjaL%2FeNKKUg4n8XbfETXRf7eWL7ZgvGCrc1YYDSRywf7zm3Bhcd%7Ctkp%3ABk9SR4rD4orcZg
3.	https://www.ebay.com/itm/396066315914?_skw=Tabu&itmmeta=01KBGARM3WXPDPBNYFTDBNHJET&hash=item5c37645e8a:g:qi0AAOSwfHBncJt~&itmprp=enc%3AAQAKAAAA4FkkgFvd1GGDu0w3yXCmilcJNySZ0%2F1H64ejWvbTAiJ9GsSSCncle73I0u%2B%2B0sLtDDUgH%2BLGmE1MnkyXW4Wzo16jB8BShV



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4.	https://www.ebay.com/itm/395872415951
5.	https://www.ebay.com/itm/185718331855?_skw=Tabu&itmmeta=01KBGARM3W73HXT5TYCHR963XB&hash=item2b3dacd9cf:g:FUQAAOSwQYZjrCY&itmprp=enc%3AAQAKAAAawFkggFvd1GGDu0w3yXCmleHRmGSZ88PQcd9w1nQDo8aEbAXVomyArRjaIJvpYbdDIYioMbqt8v2eAA%2FBUEgqXIg9l65%2Bubk9kpGO1PdKol5l4xfvP3p1ft%2Fw2T3q36Yucd0RsrCoF3NdwWcfh%2BvhnhyhO3Iv%2FZrQmiWcSQhjWkGbs42Vt1%2BRmPig%2BWofjhCQdlvWp2oPgFRhswqzHAmYEtm4oID77sJy8I82P9319bbv1be51Vgop79VBfx%2B%2BCxSQ%3D%3D%7Ctkp%3ABk9SR4rD4orcZg
6.	https://www.ebay.com/itm/116573051477?_skw=tabu&itmmeta=01KR2EBQMvwYKDVJPG858GSFCT&hash=item1b244b9a55:g:fcgAAOSwEjJoCQJG&itmprp=enc%3AAQALAAAA4GfYFPkwiKCW4ZNSs2u11xA52jZmaKa9y8fK5qJ%2Bt0NatgS6Qrp20PmgkQJY3DEu1CRw%2FT9ZpamyLFRFO2f4Ave%2FYZc3vxOUeYGcD909s4JCdUGMW8wdVhS%2FzBasUSQFscg0WhGbPqyg4v%2FUMzJbvmAGEosvTep8yiZiWLzBWGpw5D1GC3AQYgrhe0jBBjfaEOrBEo81Hjw--l3nZroFALGUAAaBmDI%2BG8%2BRiNtcQpZnJCWz4ntHBLuvN2z7T7v%2FxlmnFWF2A3RZ2PyrT3y%2FlixrdLKH3PgBvN8aeJg61ZiE%2Bw%7Ctkp%3ABk9SR9j6rs7AZw
DEFENDANT NO. 12/FLIPKART	
1.	https://www.flipkart.com/ananyadesigns-wall-poster-celebrity-tabu-actress-actresses-india-paper-print/p/itm98a38327f4c21
DEFENDANT NO. 4/CLOUD REN WALLPAPER CAVE	
1	https://wallpapercave.com/w/wp5077504
2.	https://wallpapercave.com/w/wp5077508
3.	https://wallpapercave.com/w/wp5077511
4.	https://wallpapercave.com/w/wp5077512
5.	https://wallpapercave.com/w/wp5077513
6.	http://wallpapercave.com/w/wp5077518
7.	https://wallpapercave.com/w/wp5077516
8.	https://wallpapercave.com/w/wp5077517
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27.	https://wallpapercave.com/w/wp5077565
28.	https://wallpapercave.com/w/wp5077572
29.	https://wallpapercave.com/w/wp5077577
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DEFENDANT NO. 5/ONE.IN DIGITECH MEDIA PRIVATE LIMITED	
1.	https://wallpapers.oneindia.com/celebs/tabu/wallpapers-e12400-p43768.html
DEFENDANT NO. 6/ALPHACODERS	
1.	https://wall.alphacoders.com/big.php?i=311228
DEFENDANT NO. 7/MAZAINdia	
1.	https://www.mazaindia.com/wallpapers/tabu
2.	https://www.mazaindia.com/hd-wallpaper/tabu
DEFENDANT NO. 9/META	
1.	https://www.facebook.com/tabuofficial/
2.	https://www.facebook.com/profile.php?id=100008706574113
3.	https://www.facebook.com/tabassum.hashmitabbu
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5.	https://www.instagram.com/p/BlewKFvhlcl/?igsh=MWgycmVkY283dXVsdQ==