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An e-newsletter from
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exceeding expectations

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Decoding the 'Algorithm' exclusion: A closer look at draft CRI Guidelines 2025

By Jaya Pandeya and Prabhat Kumar

The article discusses the draft version 2.0 of the Guidelines for Examination of Computer Related Inventions ('CRIs'). The updated Guidelines now include more detailed examples clarifying patentable and non-patentable subject matter. This article elaborately analyzes how the Guidelines propose to determine whether or not a claimed invention is excluded as an 'algorithm'. According to the authors, the Guidelines, if enforced

in their present form, could lead to denial of protection for inventions solely because they lack hardware features, thereby risking the exclusion of legitimate software-based inventions from patentability.

[Read more](#)

Patentability of intermediates – Troubling interpretation: A critique of the *Zeria* judgment

By Archana Viswanathan and Prosenjit Chattopadhyay

The article discusses a recent Delhi High Court decision which is one of the few cases thus far, concerning patentability of pharmaceutical intermediates. The Court has held that even for intermediate compounds, the applicant must demonstrate that the claimed invention leads to a pharmaceutical product with enhanced therapeutic efficacy, not merely improved process

yields or synthetic convenience. According to the authors, the decision seems to reflect a rigid and arguably somewhat imperfect interpretation of Section 3(d) of the Patents Act, particularly when applied to intermediate compounds.

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In good spirits: The Geographical Indication war over 'Pisco'

By Kirti Sood

The article discusses a recent Delhi High Court decision where the Court has conducted a thorough examination of the provisions regarding the prohibition of GI registration in specific instances, as well as the registration of homonymous GIs. The Court ruled that shared history cannot be monopolized and that both Peru and Chile have legitimate

claims to produce 'PISCO'. According to the author, the decision exemplifies how Indian courts are navigating the evolving landscape of GI law, aiming to safeguard traditional products while ensuring fair competition.

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Rethinking the thresholds in biosimilar patent infringement disputes

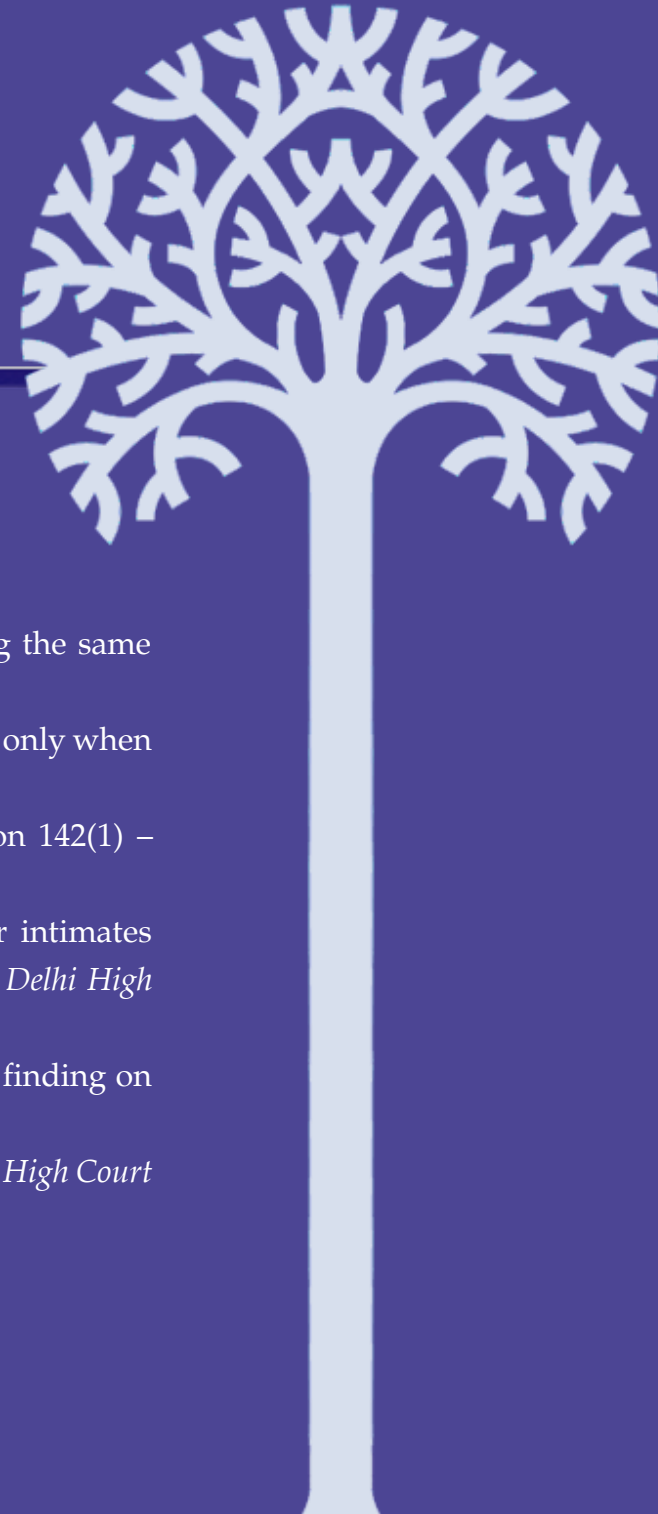
By Geethanjali K.V.

The article discusses a Delhi High Court decision which granted an-interim injunction restraining a pharma company from manufacturing, clearing or dealing its biosimilar version of the cancer medication Nivolumab until the expiry of the Indian Patent. According to the author, by treating the defendant's regulatory filings and bio similarity claims as

indicative of infringement, the Court seems to have deviated from an earlier precedent where the absence of an infringing product and the failure to establish claim mapping precluded the grant of *quia timet* relief.

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Ratio Decidendi



- Patents – Resolving a problem in one type of motor vehicle cannot be equated with resolving the same problem in different type of vehicle – *Madras High Court*
- Patents – Infringement of process patent – Onus of proof shifts on defendant under Section 104A only when plaintiff mandatorily proves that products are identical – *Delhi High Court*
- Trademarks – Statements made in opposition notices do not qualify as ‘threats’ under Section 142(1) – *Madras High Court*
- Trademark – Deemed abandonment of opposition if opponent neither submits evidence nor intimates reliance only on facts stated in opposition; consideration of written arguments not required – *Delhi High Court*
- Pro tem deposit in a case of alleged infringement of SEP – Court when not to get into detailed finding on essentiality and validity of suit patent – *Delhi High Court*
- Passing off action can be initiated in respect of a trademark which is registered as Design – *Delhi High Court Division Bench*

Patents – Resolving a problem in one type of motor vehicle cannot be equated with resolving the same problem in different type of vehicle

The Madras High Court has set aside the rejection of patent for an invention titled 'Accelerator Safety Control Device'. The problem to be resolved by the claimed invention was disengaging the accelerator when the brake is engaged in a two or three-wheeler motor vehicle. Comparing the invention with the cited prior arts, the Court noted that all cited prior arts were intended to be applied to four wheelers.

The High Court noted that the problem to be solved in the claimed invention was identical to that resolved in the cited prior arts but, it was of the view that resolving a problem in one type of motor vehicle cannot be equated with resolving the same problem in a different type of motor vehicle (two or three-wheeler here).

Also, the Court set aside the Controller's conclusion that components of the claimed invention were present in cited prior arts and that the claimed invention could not be said to be a technical advance under Section 2(1)(ja) of the Patents Act, 1970, over cited prior arts. While remanding the matter for reconsideration, the High Court observed that it is open to the

patent applicant to show economic significance as an alternative to technical advance, and that the aspect was not noticed in the order impugned before it.

[*TVS Motor Company Limited v. Deputy Controller* – Judgement dated 8 July 2025 in C.M.A. No. 2115 of 2021, Madras High Court]

Patents – Infringement of process patent – Onus of proof shifts on defendant under Section 104A only when plaintiff mandatorily proves that products are identical

Observing that the plaintiffs failed to fulfil the mandatory requirements of Section 104A of the Patents Act, 1970, the Delhi High Court has held that no direction can be issued to the defendant to disclose its manufacturing process filed in a sealed cover.

Relying on various precedents, the Court noted that the intent behind Section 104A is to shift the onus of proof from the plaintiff to the defendant in cases involving infringement of process patents, subject to certain pre-conditions – one being that the plaintiff must show that the defendant's product is identical to the product directly obtained from the plaintiff's process

patent. It was observed that only when the plaintiff proves that its product and the defendant's product are identical, the Court may direct the defendant to disclose its process to show that the same is different from the patented process.

The High Court in this regard also rejected the plaintiff's contention that Section 104A cannot be invoked by the defendant at the interim stage of the suit and the same comes into play only at the stage of final adjudication of the suit. The Court noted that from a plain reading of Section 104A, there is nothing to suggest that it cannot be invoked at an earlier stage, particularly when the plaintiff was seeking disclosure of the defendant's process by way of an interlocutory application. According to the Court, if the Court can refuse disclosure at the final stage, it can surely refuse to direct the defendant to disclose its process at an earlier stage.

It may be noted that the High Court in this case also held that Section 104A would prevail over the discovery provisions under the Civil Procedure Code (CPC) as amended by the Commercial Courts Act, 2015. It was observed that the Patents Act is a specialized legislation whereas the Commercial Courts Act, 2015 is a general legislation dealing with all commercial disputes, and that it is a settled position of law that provisions of a special statute would always prevail over the provisions of general law.

Further, contention of the plaintiff that Section 104A will have no application in respect of biological drugs, as two different biological drugs, by their very nature, cannot be identical to each other, was also rejected by the Court. The Court in this regard observed that the threshold of proving identity in substance and composition under the said section cannot be diluted in biologic cases merely because absolute replication is scientifically difficult.

The Court also rejected the contention that the defendant's product was identical to the plaintiffs' product as the defendant itself has used the plaintiffs' product, as a reference biologic in its application before the CDSCO for approval of a similar biologic. It was held that the filing of the aforesaid application by the defendant with the CDSCO by itself would not fulfil the requirement of Section 104A. Also, relying upon the Guidelines on Similar Biologics, 2016, the Court was of the view that even if a drug is stated to be the similar biologic of a reference biologic, it does not naturally follow that the process of manufacturing the same is identical to that of the 'reference' biologic.

[F-Hoffmann-LA Roche AG and Another v. Zydus Lifesciences Limited – Judgement dated 23 July 2025 – 2025 SCC OnLine Del 5027]

Trademarks – Statements made in opposition notices do not qualify as ‘threats’ under Section 142(1)

The Madras High Court has rejected the contention that the expression ‘or otherwise’ in sub-section (1) of Section 142 of the Trade Marks Act, 1999 should be construed widely as embracing statements made in the notices of opposition and thus the statements made in the notices of opposition qualify as ‘threats’ within the meaning of Section 141(1). Section 142 allows filing of suit against groundless threats of legal proceedings.

In the notices of opposition, the defendant had threatened that the use of the mark ‘ANAGANAGA’ by the plaintiff constituted infringement of the defendant’s registered trademark ‘NAGA’. The defendant had also threatened to initiate proceedings under Sections 102 and 103. The plaintiff had submitted that these statements in the notices of opposition qualify as ‘threats’ within the scope of Section 142(1).

The High Court in this regard observed that although the expression ‘or otherwise’ in Section 142(1) covers all forms or modes of communication of a baseless or unjustified threat of initiation of infringement or like proceedings, statements made by a party, such as in the case by the defendant, in pleadings in

legal proceedings cannot be construed as threats for purposes of initiating such proceedings.

It may be noted that the Court in this regard also noted that any proceedings for malicious prosecution would require a necessary, *albeit* not sufficient pre-condition of success in the opposition proceedings by the plaintiff. It was also observed that the adjudicating authority (Registrar of Trademarks) would be the sole judge of pleadings in such proceedings.

[*Cherukuri Gopi Chand v. Naga Ltd.* – Judgement dated 16 July 2025 in C.S.(Comm.Div.) No. 92 of 2025, Madras High Court]

Trademark – Deemed abandonment of opposition if opponent neither submits evidence nor intimates reliance only on facts stated in opposition; consideration of written arguments not required

The Delhi High Court has observed that even though Section 21(4) of the Trade Marks Act mentions that the opponent to the trademark ‘may’ rely upon any evidence, the same has to be in the prescribed manner and within the prescribed time as stipulated in Rule 45(1) of the Trademarks Rules, 2017.

Dismissing the appeal against the Registrar’s order in the opposition filed by the present appellant, the High Court

observed that though it is not compulsory for the Opponent to adduce evidence in support of its Opposition, if the Opponent-Appellant (in the case) chose not to adduce evidence, it was incumbent upon him to intimate the Respondents that it does not desire to adduce evidence and, instead, rely upon the facts stated in the notice of Opposition. The Court was hence of the view that as the opponent failed to intimate under Rule 45(1) within prescribed time of 2 months, the consequence of abandonment of the Opposition under Rule 45(2) shall follow.

It may be noted that the High Court here also rejected the contention that it was mandatory for Registrar to consider the written arguments submitted by the opponent-Appellant while deciding the Opposition, even though the opponent had not adduced evidence in support of its Opposition and neither intimated reliance only on facts. It was noted that as per Rule 50(1), the Registrar must give notice to the parties of the first hearing after the closure of the evidence. According to the Court, as there was no closure of the evidence as stipulated under Rule 50(1), the consideration of the written arguments provided under Rule 50(5) was not required.

[*Tablets (India) Limited v. Spey Medicals Private Limited* – Judgement dated 31 July 2025 in C.A.(COMM.IPD-TM) 76/2022, Delhi High Court]

***Pro tem* deposit in a case of alleged infringement of SEP – Court when not to get into detailed finding on essentiality and validity of suit patent**

In a case involving alleged infringement of Standard Essential Patents (SEP), the Delhi High Court has granted *pro tem* deposit.

According to the Court, though the Court is required to give a *prima facie* finding of essentiality and validity of the suit patents before allowing a *pro tem* deposit, where the conduct and actions of the implementor during the negotiations stage indicates no serious challenge to the essentiality and validity of the suit patents, the Courts may not get into a detailed exploration on merits.

Observing that the determination of *pro tem* deposit has to be very fact-centric, the Court was of the view that if in every case the Court were to conduct an in-depth examination of issues relating to the essentiality and validity of the suit patents, the whole objective behind a *pro tem* deposit would be defeated.

On the facts of the case, the Court noted that the defendant was an unwilling licensee in terms of the FRAND protocol, as its conduct amounted to ‘patent holdout’. The Court for this purpose noted that the petitioner complied with the FRAND protocol by asserting its AAC portfolio of patents and calling

upon the defendant to enter into a license agreement. However, the defendant failed to comply with the obligations of an implementor of showing the willingness to negotiate and execute a FRAND license and to make a counteroffer. The Court noted that the defendant's strategy was simply to delay the negotiations.

It also, for this purpose, analyzed the correspondence exchanged between the petitioner and the defendant post filing of the suit. The High Court noted that the conduct of the defendant in making its first counter offer only after the initiation of the present suit reflected an attempt to delay proceedings and was not reflective of good faith behaviour in FRAND licensing negotiations.

Further, on the question of validity of suit patent, the Court noted that the petitioner had license agreements with other parties and that licensee/implementor were paying royalty/*pro tem* deposits in respect of SEPs. It also noted that during the pendency of the suit, the defendant had itself made a counteroffer which amounted to a *prima facie* admission regarding the essentiality and validity of at least some of the suit patents and a *prima facie* admission of the fact that defendant's devices implemented the suit patents.

[*Dolby International AB v. Lava International Limited* – Judgement dated 10 July 2025 in CS(COMM) 350/2024, Delhi High Court]

Passing off action can be initiated in respect of a trademark which is registered as Design

The Division Bench of the Delhi High Court has set aside the Single Bench decision which had held that no passing off action can be founded on a trademark or trade dress which is, in its entirety, registered as a design under the Designs Act.

Relying upon a 5-Judge Bench decision in the case of *Carlsberg Breweries A/S v. Som Distilleries and Breweries Ltd.* [See ratio of this decision, as reported in January 2019 issue of LKS IPR Amicus [here](#)], the Single Bench had held that the subject matter of the passing off action laid by the plaintiff (Appellant here before the DB) was no more, and no less, than the design in respect of which it already held a registration under the Designs Act. The Single Bench had thus dismissed the suits for want of any maintainable cause of action.

Citing various paragraphs of the *Carlsberg* decision, the DB here noted that there was an indication in the 5-Judge decision that a passing off action, predicated on the identity or deceptive similarity of the shape, features, combination of colours, etc., of the defendant's goods, with the registered design of the plaintiff,

is permissible. The Court observed that commercial use of the registered design of the plaintiff by the defendant, not merely as a trademark, but as its larger trade dress, or packaging, or the like, so as to pass off its goods as the goods of the plaintiff, would certainly justify a claim for passing off at the instance of the plaintiff.

According to the Division Bench, the distinction that *Carlsberg* sought to draw was between mere trademark use, as may give

rise to a claim for infringement, and a use of the registered design of the plaintiff as the trade dress and presentation of the defendant, which would justify an action for passing off. The Court for this purpose also observed that passing off is a distinct right, which resides in its own common law space, apart from and independent of, the confines and constraints of the Trade Marks Act, or the Designs Act, or, for that matter, any other statute.



News Nuggets

- Absence of definition of 'infringement' in Patents Act is a 'legislative lacuna'
- Trademarks – Priority of user by itself is no defense to infringement
- Patents – Therapeutic efficacy is wholly irrelevant for purposes of interpreting Section 3(e)
- Trademark 'NUTELLA' declared a well-known trademark
- Copyright infringement of literary work in production of film when not sustainable
- Trademarks 'FUNFINE' and 'FUNSHINE' are phonetically and deceptively similar
- India-UK FTA – No breach of TRIPS or domestic Indian law
- India will not allow evergreening of patents: Commerce Minister
- Prime Minister asks scientists to secure patents for new drugs, etc.

Absence of definition of 'infringement' in Patents Act is a 'legislative lacuna'

The Delhi High Court has recently observed that the Patents Act is, in the intellectual property firmament, a peculiar statute, as it does not define 'infringement', or delineate what constitutes infringement of a patent. The Court in this regard noted that there is no provision, in the Patents Act, akin to Section 29 of the Trade Marks Act, 1999, which defines infringement of a trademark, Section 51 of the Copyright Act, 1957, which defines infringement of copyright, or Section 22 of the Designs Act, 2000, which defines design piracy. Terming the absence as 'legislative lacuna', the High Court advised the legislature to correct it at some appropriate stage. It may be noted that the Court in *Mold Tek Packaging Limited v. Pronton Plast Pack Pvt. Ltd.* [Judgement dated 11 July 2025] though observed that it is not difficult to glean, from the provisions of the Patents Act, what constitutes 'infringement', it was of the view that certainty and precision are always desirable virtues in any legislative instrument.

Trademarks – Priority of user by itself is no defense to infringement

The Delhi High Court has held that priority of user becomes a defense to an action for infringement only if it falls within the

parameters of Section 34 of the Trade Marks Act. The Court noted that it is only if the defendant has been using the allegedly infringing mark, from a point of time prior to the registration as well as the user of the asserted mark of the plaintiff, that the defendant, despite being an infringer, can escape an injunction by seeking recourse to Section 34.

Upholding the Single Judge decision, the Division Bench in *Bodhisattva Charitable Trust v. Mayo Foundation for Medical Education and Research* [Judgement dated 28 July 2025] noted that the registration of the marks in favour of the plaintiff-respondent was prior, in point of time, to the first user of the marks by the defendant-appellants here.

Patents – Therapeutic efficacy is wholly irrelevant for purposes of interpreting Section 3(e)

The Calcutta High Court has set aside the finding of the Deputy Controller that bioavailability alone does not establish synergism and requires therapeutic efficacy for the purpose of Section 3(e) of the Patents Act, 1970. Holding that the finding was based on a misconception of the provisions, the Court noted that while the latter is a criterion for adjudication under Section 3(d) and is wholly irrelevant for the purposes of interpreting Section 3(e). Setting aside the Order passed by the Deputy Controller, the Court in *Oramed Ltd. v. Controller General Of*

Patents And Designs [Judgement dated 4 July 2025] was of the view that this was a serious flaw in the inasmuch as it brought elements of Section 3(d) *inter-alia* enhancement of therapeutic efficacy as well as bioavailability which are wholly irrelevant and immaterial insofar as Section 3(e) is concerned.

Trademark 'NUTELLA' declared a well-known trademark

The Delhi High Court has declared NUTELLA, used for a hazelnut cocoa spread, a well-known trademark. The Court noted that by virtue of its long-standing use, extensive marketing, and unique trade dress, 'NUTELLA' / has become synonymous to a thick creamy hazelnut cocoa spread. It noted that the mark 'NUTELLA' was advertised all across India *qua* which the plaintiffs have spent INR 3 crore, INR 7 crore and INR 16 crores from the financial years 2020-2021, 2021-2022 and 2022-2023 respectively, and also had gross sales figures of INR 233 crores, INR 145 crores and INR 106 crores for the financial years 2020-2021, 2021-2022 and 2022-2023 respectively. Further, the Court in *Ferrero SPA and Others v. M.B. Enterprises* [Judgement dated 28 July 2025] also observed that the plaintiff was well established in the markets all across the globe and was not mere fly by night operators, and that the mark had already been

declared as 'well-known trademark' by the World Intellectual Property Organization (WIPO) and the International Trademark Association.

Copyright infringement of literary work in production of film when not sustainable

The Bombay High Court has dismissed the application for injunction restraining the defendants from exploiting the film titled 'DREAM GIRL -2', produced by Defendant, on the grounds of alleged infringement of the Plaintiffs copyright in its purported literary work. Dismissing the application, the Court also awarded costs to the defendants here.

The Court was of the *prima facie* view that the Plaintiff by alleging copyright infringement of the Plaintiff's script by the Defendants' Film was seeking a monopoly over matters in which *ex-facie* no copyright subsists to begin with. It was observed that it included common themes, ideas, unoriginal / stocks / scenes a *faire* matters, and other aspects directly flowing from such elements which are not protectable either by themselves or taken together. The Court here for this purpose also listed the differences / dissimilarities between Plaintiff's script and Defendants' film.

Also, observing that the Plaintiff had undertaken a piecemeal / dissected / misleading comparison of the rival works, which was not permissible, the Court in *Ashim Kumar Bagchi v. Balaji Telefilms Ltd.* [Order dated 6 August 2025] was of the view that Plaintiff's script, based on common themes, cannot be either 'novel' or the 'substance, kernel and foundation' or 'salient features' which are in any way protectable.

Trademarks 'FUNFINE' and 'FUNSHINE' are phonetically and deceptively similar

The Delhi High Court has held that the marks, 'FUNFINE' and 'FUNSHINE', are phonetically and deceptively similar to each other to confuse the public and consumers. The Court noted that although, a critical comparison of the two marks might disclose some differences, a purchaser of average intelligence would be deceived by the overall similarity of the two names. According to the Court, the holistic comparison of 'FUNFINE' and 'FUNSHINE' revealed significant phonetic, structural, and visual similarities that are likely to cause confusion among consumers, more so as the marks were registered under the same Class and were used for identical goods. Noting that 'FUNFINE' was the prior user, the Court in *Ved Prakash Garg v. Dhruv Singh* [Judgement dated 31 July 2025] held that the registration of 'FUNSHINE' violated Sections 9(2)(a), 11(1) and 11(2) read with

Section 18 of the Trade Marks Act, and thus was liable to be removed from the Register.

India-UK FTA – No breach of TRIPS or domestic Indian law

As per reports, a senior government official has stated that India has not gone beyond the Trade Related Aspects of Intellectual Property Rights (TRIPS) Agreement or the domestic Indian laws on IPR (See *Indian Express* news report [here](#)). Earlier, there were reports about trade experts raising concerns stating that India has moved away from its conventional position on IPR. There were apprehensions (see [here](#)) that compulsory licensing of life-saving medicines will be put under greater scrutiny and constraints.

India will not allow evergreening of patents: Commerce Minister

India's Commerce Minister has stated that India will not allow 'evergreening' of patents. According to PTI news report available [here](#), the Minister also stated despite that, India still has a robust IPR chapter in the two recent Free Trade Agreements with two of the toughest countries of the world in IPR - Switzerland and the UK.

Prime Minister asks scientists to secure patents for new drugs, etc.

Prime Minister Narendra Modi on Friday asked scientists and entrepreneurs to focus more on research and development (R&D), and secure patents for new drugs and medical technologies to ensure self-reliance in the pharmaceutical

segment. As per new reports by Business Standard, available [here](#), the call comes at a time when India has been lagging behind in terms of R&D spending, according to a Department of Pharmaceuticals (DoP) study paper on industry-academia linkage in the segment.

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exceeding expectations