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

+ CS(COMM) 344/2026

TOPRANKERS EDTECH SOLUTIONS PRIVATE LIMITED &
ORS.Plaintiffs

Through: Mr. J. Sai Deepak, Senior Advocate
with Mr. Ankur Khandelwal, Mr.
Chirag Sharma, Mr. Nikhil Saurabh
and Mr. Sidhi, Advocates.

versus

LPT EDTECH PRIVATE LIMITED AND ORS.Defendants

Through: None.

CORAM:
HON'BLE MR. JUSTICE TUSHAR RAO GEDELA

ORDER
13.04.2026

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I.A. 8768/2026 (Additional Documents)

1. The present application has been filed on behalf of the plaintiffs under Order XI Rule 1(4) of the Code of Civil Procedure, 1908 (hereinafter referred to as 'CPC') as applicable to commercial suits under the Commercial Courts Act, 2015 (hereinafter referred to as 'CC Act') seeking leave to place on record additional documents.
2. The plaintiffs are permitted to file additional documents in accordance with the provisions of the CC Act and the Delhi High Court (Original Side) Rules, 2018.
3. Accordingly, the application stands disposed of.



I.A. 8769/2026 (Pre-Institution Mediation)

4. This is an application filed by the plaintiffs seeking exemption from instituting pre-litigation Mediation under Section 12A of the CC Act.

5. As the present matter contemplates urgent interim relief, in light of the judgment of the Supreme Court in *Yamini Manohar vs. T.K.D. Keerthi: (2024) 5 SCC 815*, exemption from the requirement of pre-institution Mediation is granted.

6. The application stands disposed of.

I.A. 8770/2026 (Seeking time to file deficient Court fees)

7. The present application has been filed by the plaintiffs under Section 149 read with Section 151 of CPC, seeking permission to make good the deficiency, if any, in the Court Fee already paid.

8. For the reasons stated therein, the application is allowed. Plaintiffs are directed to make good the deficiency of the Court Fee already affixed within one 2 weeks from date.

9. The application stands disposed of.

I.A. 8771/2026 (Exemption)

10. This is an application filed on behalf of the plaintiffs under Section 151 of CPC seeking exemption from filing fair typed copies of documents along with the captioned suit.

11. Exemption allowed, subject to just exceptions. However, fair, typed and legible copies of the documents with proper margins be filed within four weeks with an advance copy to the defendants.

12. The application stands disposed of.

I.A. 8772/2026 (Exemption from filing lengthy synopsis and list of dates)

13. This is an application filed on behalf of the plaintiffs under Section 151 of CPC seeking exemption from filing the synopsis and list of dates within the prescribed limit of five pages.



14. Exemption allowed, subject to just exceptions.

15. The application stands disposed of.

I.A. 8767/2026 (Order XXXIX Rules 1 & 2, CPC)

16. Present application has been filed on behalf of the plaintiffs under Order XXXIX Rules 1 & 2 of CPC, 1908 seeking *ex-parte ad-interim* injunction against the defendants.

17. Plaintiff no.1 claims to be a leading educational company providing offline and online coaching, educational resources and test preparation services for various competitive exams in India. Its brands include “Toprankers”, “LegalEdge”, “Creative Edge”, “Judiciary Gold” and “SuperGrads”. Plaintiff no.2 is stated to be the franchisee of plaintiff no.1 with a significant presence in Delhi and has its principal place of business in Delhi. Its centres in Delhi are located in Connaught Place, Dwarka, Pitampura and New Delhi South Extension. Plaintiff no.3 is stated to be a minor girl aged 17 years, and a resident of Sri Ganganagar, Rajasthan. She is stated to have secured All India Rank 1 in CLAT 2026.

18. Plaintiff no.1 claims that during the financial year 2024-25, approximately 2266 (offline and online) students were enrolled across the Delhi-NCR region. It is claimed that as of January 2026, the plaintiff no.1 has generated revenue of approximately Rs.17.70 Crores for FY 2025-26. Plaintiff no.1 claims that the said revenue constitutes approximately 60% of its total revenue of the plaintiff no.1 across India. In para 17 of the plaint, the plaintiff no.1 has enlisted a large number of its offline centres located across India.

19. It is stated that about 75,009 candidates registered for the CLAT UG 2026 examination, out of which 72,631 candidates appeared. Plaintiff no.1 claims that the plaintiff no.3 applied for and was selected for a special batch of meritorious students called “CLAT 2026 | Champions batch I” in February



2025. It is stated that plaintiff no.3 remained an active and diligent student of plaintiff no.1 and regularly attended the structured coaching program, including live and recorded lectures, mentorship sessions and subject classes across General Knowledge, Legal Reasoning, Logical Reasoning, English and Quantitative Techniques. The coaching is stated to include numerous full length CLAT mock examinations, AILET mocks, GK Fiesta yearly tests, SLAT mocks, etc.

20. Plaintiff no.3 is also stated to have availed certain mock tests with the defendant no.1 under its package “CLAT DLP (Distance Learning Program) 2026”, which was limited to a certain number of mock examinations and three isolated classes out of 30. The comparative chart is provided in para 27 of the plaint.

21. Plaintiff no.1 claims that while plaintiff no.3 was checking her result for CLAT 2026, her brother had shot a video and shared the same with plaintiff no.1, who, with her consent, posted the video on its social media channels and referred to it as a “Reaction video”. It was also posted on YouTube. The video is stated to have garnered around 2,67,000 views till date. It is also stated that the said video was shared, re-shared and uploaded at multiple platforms including BBC News, DD News, Amar Ujala, The Lalantop, RajasthanTak amongst others.

22. It is claimed, on the declaration of the results of CLAT 2026, the plaintiff no.3 secured All India Rank 1. In view of such popularity, she is stated to have been approached by defendant no.1, who was keen to portray plaintiff no.3 as its student. It is also claimed that defendant no.2, in order to lure plaintiff no.3 and her family members, offered to sponsor the entire college fee of five years if it was allowed to portray and exclusively use the name of the plaintiff no.3 as its own student, to the exclusion of all other coaching institutions. The father of the plaintiff no.3 is stated to have refused.



23. It is alleged that despite such refusal, the defendant no.1 started taking complete credit for the success of plaintiff no.3 by using her name and morphed pictures on digital, print and social media. Plaintiff no.3 is claimed to have communicated on 17.12.2025, requesting defendant nos.1 and 2 to refrain from doing so. It is claimed that on 18.12.2025, the plaintiff no.3 and her family made a video and openly gave credit of her success to plaintiff no.1, to the exclusion of all others including defendant no.1.

24. It is stated that the defendant nos. 1 and 2, *mala fide*, and intending to cause irreparable loss to the goodwill and reputation of the plaintiffs, disseminated the defamatory content on various social media platforms, which are mentioned in detail in para 33 of the plaint and are reproduced hereunder:

“(a) YouTube: Defamatory video titled "CLAT 2026 AIR 1 Geetali Gupta Controversy Exposed”

<https://youtu.be/AU3Q27>

<https://www.youtube.com/watch?v=AU3Q27-BA4I>

“(Defamatory Video”)

(b) Blog: Defamatory blog titled "LegalEdge—Law Prep Controversy: Truth of AIR-1 CLAT 2026" LegalEdge—Law Prep Controversy: Truth of AIR-1 CLAT 2026 <https://www.lawpreptutorial.com/blog/legal-edge-law-prep-controversy/> (“Defamatory Blog”), which includes a sub-head of "LegalEdge's Pattern of Buying CLAT Toppers"

(c) LinkedIn: Defamatory post on LinkedIn sharing the defamatory YouTube video as listed above <http://www.linkedin.com/posts/law-prep-jodhpur-clat-2026-air-1-geetaku-gupta-controversy-activity-7408132944139124738->”

25. It is alleged that the defendant no.2 had made serious defamatory and disparaging statements and allegations against the plaintiffs which are enumerated in para 34 of the plaint and are reproduced hereunder:

“(a) Allegations of Fraud, Deceit, and Betrayal: Defendant Nos.1 and 2 accused Plaintiff No.1 and its directors of running their institution on a “foundation of lies, deceit, and betrayal” and of playing with the “future of innocents”.

(b) Allegations of Unethical Business Practices: Defendant Nos.1 and 2 labelled directors of plaintiff no.1 as “old sinner (‘Purana Paapi’),”



suggesting that the said directors engage in unethical practices to achieve financial targets. It has been further alleged that Plaintiff No.1 and its directors aim to “raise hundreds of thousands of crores from investors” and “put the cap on someone else's head... and take their own exit”, thereby imputing fraudulent financial motives to dupe people of their money.

(c) False Claims Regarding CLAT Toppers: *Specific, demonstrably false allegations that Plaintiff no. 1 and its directors have a history of making fake claims about CLAT toppers.*

(d) Allegations of Pressurizing Plaintiff No.3: *Grave and entirely false and vague accusations that the directors of Plaintiff no.1 put "tremendous pressure, mental pressure" on the CLAT 2026 topper, Plaintiff no.3, to record a video defaming the Defendant Nos.1 and 2. It is further alleged that the said Plaintiffs "tortured" and made her sign "long contracts" to this effect. These allegations are a complete fabrication, designed to portray the Plaintiffs in bad light.*

(e) Allegations of Falsely Claiming Judiciary Results: *Insinuation that Plaintiff No.1 and its directors' judiciary coaching brand, Judiciary Gold, fraudulently claimed Rank 19, Sarwar Khan, in the Rajasthan Judicial Services exam, stating he had "no connection of any kind with Judiciary Gold". Such allegation is false and baseless.*

(f) Calling Plaintiff's Actions "Cheap Acts": *Throughout the Video, derogatory language such as "cheap act", "fake propaganda system", and "malicious propaganda system" has been used to describe the legitimate business activities of Plaintiff No.1 and its directors. It is further alleged that Plaintiff No.1 and its directors are using innocent students as "tools".*

(g) Imputation of "lack of quality" of Plaintiff No.1: *In the video, it has been stated that Defendant No.1's coaching institute, "Law Prep Tutorial" is successful due to its "quality training, quality delivery and students review" and not because of funding from investments and unknown (idhar udhar ke) sources. Further, it is suggested that Plaintiff No.1 should focus on hiring "good teachers", imparting "good education", providing "quality delivery and personal attention." Such insinuations are with the sole intent of lowering the reputation of Plaintiff No.1 (as contrasted to Defendant No.1) in the eyes of the viewers', most of whom are likely to be young students and their parents exploring coaching options. This is further evident from the description provided with the Video wherein it is clearly written that Plaintiff No.1 "buys ranks" and "fools innocent parents." This becomes further evident from the fact that in the very next line, Defendant No.1 and 2 has highlighted their own fake achievements.*



(h) Pertinently, the said video has an imputation that Plaintiff No.3 entered into a "contract" to give credit of her success to Plaintiff No.1. This ruthless attack on the innocence of a minor who was then slated to sit for her board exams this year (and is currently in the midst of her board exams) is itself evident of the extent of maliciousness of Defendant No.1 and 2. On one hand, Defendant No.2 expressed his respect for the minor's wish to give the credit of her success to Plaintiff No.1 and on the other, the said Defendant alleged foul play.

(i) Towards the end of the said video, Defendant No.2 also declared to come up with a second part of the Defamatory Video thereby clearly showing his intent of continuing his malicious attack.”


26. Upon gaining knowledge of such defamatory and disparaging content uploaded by the defendants on various social media platforms, the plaintiff no.1 issued a cease and desist notice dated 05.01.2026 with a request to take down the defamatory content. However, it is stated that as a counter blast on 06.01.2026, the defendant nos.1 and 2 lodged a false and frivolous FIR bearing no. 0004/2026 registered at Jodhpur against the directors of plaintiff no.1, plaintiff no.3 and her father. It is stated that in the said FIR, various allegations were also levelled against plaintiff no.3 and her family. Some of such defamatory posts which were published after the FIR was registered are enumerated in para 42 of the plaint. A few of them are extracted hereunder:

<i>S.No.</i>	<i>Post and Publication</i>	<i>Date of Publication</i>	<i>Channel</i>
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1.	<p>https://www.instagram.com/primepostdailydotcom?igsh=MTdtaDBxcDRzMXVudQ==</p> <p>Posted on the Channel of: Primepostdailydotcom</p> <p>Social Media Platform: Instagram (Defendant no.3)</p>	7 January 2026	
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2.	<p>https://www.instagram.com/thenewsbrains?igsh=d2VnZ3J4cm9najBo</p> <p>Posted on the Channel of: Thenewsbrains</p> <p>Social Media Platform: Instagram</p> <p>(Defendant no.3)</p>	8 January 2026	 <p>1:05</p> <p>Posts Follow</p> <p>thenewsbrains Lehal Elims • Topper</p> <p>FILED AGAINST TOPRANKERS</p> <p>LegalEdge</p> <p>thenewsbrains An FIR has been filed against directors of LegalEdge (Toprankers) after serious allegations surfaced around the CLAT 2026 AIR-1 result. Law Prep Tutorial has accused the coaching institute of coercing the topper and her family into publicly denying her academic association with Law Prep, despite documented enrollment and usage of its programs and materials. The complaint alleges contractual pressure, forced video statements, and coordinated digital and print promotions aimed at misleading aspirants during the counselling phase. Multiple sections of the Bharatiya Nyaya Sanhita and the IT Act have been invoked, and the case is currently under investigation.</p> <p>Source : Law Prep Tutorial</p>
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3.	<p>https://www.instagram.com/bfsimedia?igsh=MW9lM252NzQwbTJuZw==</p> <p>Posted on the Channel of: Bfsimedia</p> <p>Social Media Platform :Instagram</p> <p>(Defendant no.3)</p>	8 January 2026	
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4.	<p>http://share.google/9Ks1ZoKzH9msr6M0G</p> <p>Posted on the Channel of: Dainik Jagran</p>	14 January 2026	
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5.	<p>http://news24online.com/information/law-prep-tutorial-fir-against-legal-edge-directors/717088/</p> <p>Posted on the Channel of News 24</p>	19 January 2026	 <p>The screenshot shows a news article from News 24. The main headline reads: "Law Prep Tutorial files FIR against LegalEdge (Toprangers) directors over CLAT 2026 AIR-1 controversy". Below the headline, there is a sub-headline: "LegalEdge (Toprangers) founders to be (re)labeled in CLAT 2026 Topper Controversy? Serious questions have emerged following an FIR related to CLAT 2026 AIR-1." The article is dated "Updated: Jan 19, 2026 11:05 AM". There is a large graphic at the bottom of the article that says "FILED AGAINST toprangers." with a logo of a person climbing a ladder.</p>
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LAW PREP Tutorial

CLAT 2026 RESULTS

38+ Under Top 100 AIR
280+ Under Top 1000 AIR
1000+ Selections
 As per information received so far...

HIGHEST SELECTIONS EVER

STATE TOPPERS

RAJASTHAN
AIR 1 GEETALI

KARNATAKA
AIR 3 ROHAN

ODISHA
AIR 14 PRATHMESH

UTTAR PRADESH
AIR 15 SAANVI

TELANGANA
AIR 17 PRATHIVA

BIHAR
AIR 26 YASHI

WEST BENGAL
AIR 29 ROSHAN

PUNJAB
AIR 44 YAJVIN

ADMISSIONS OPEN FOR CLAT 2027-28

JAIPUR : BAPU NAGAR | MANSAROVAR | VAISHALI NAGAR | CALL: 72400 60099
 JODHPUR : OPP. STEEL BHAWAN, NEAR ITI CIRCLE, SHASTRI NAGAR | CALL: 76659 44999

6:34

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LAW PREP Tutorial

BIG DREAMS NEED AN EARLY START

AIR 1 CLAT 2026 GEETALI

AIR 1 AILET 2026 ARYAN

BEGIN YOUR PREPARATION TODAY FOR

CLAT 2026

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दैनिक भास्कर
सच्ची बात, बेधड़क
जोधपुर, राजस्थान, सोमवार, 26 जनवरी, 2026 मूल्य ₹ 5.00

CLAT 2026
CATEGORICAL

**LAW PREP
— Tutorial —**

AIR 1

CLAT 2026
GEETALI
EPT ID: 0060489
ONLINE GC BATCH

AIR 1

AILET 2026
ARYAN
EPT ID: 0079546
ONLINE PROGRAM

42+ UNDER TOP 100 AIR | 360+ UNDER TOP 1000 AIR | 1600+ NLU SELECTIONS

JODHPUR CITY TOPPERS

1 2





27. Plaintiffs claim that the defamatory campaign led by the defendants involved digitally manipulated and AI generated images portraying the plaintiffs as being behind bars, while no such arrest ever took place. This is not only a wilful and deliberate fabrication but also intended to not only defame the plaintiffs but also to disparage and bring down the reputation of the plaintiff nos.1 and 2.

28. Though the Rajasthan High Court at Jodhpur is stated to have passed orders staying the FIR registered at Jodhpur, yet the defendant nos.1 and 2 have continued their blatant and malicious campaign.

29. Plaintiffs claim that insofar as plaintiff no.3 is concerned, the defendant nos. 1 and 2 have committed the following unlawful acts:

- A. Creation, generation, and circulation of AI-generated deepfakes or synthetic content using the plaintiff no.3's face and identity.
- B. Creation and circulation of AI-morphed content depicting the Plaintiff No.3 endorsing the defendant no.1.
- C. Deployment of image generation tools, datasets, or AI models trained



on, derived from, or utilizing the plaintiff no.3's photographs, likeness, or visual attributes.

D. Creation, publication, and dissemination of morphed, altered, and manipulated images and visual content involving the plaintiff No.3.

30. Plaintiffs contend that the defendant has also uploaded a defamatory blog containing disparaging and malicious imputations against the plaintiffs, which have been enumerated in para 68 of the plaint and are extracted hereunder:

“LegalEdge has signed marketing contracts with the AIR-1 topper Geetali Gupta, turning her into a year-long promotional asset. These contracts come with high commercial value, along with so-called gifts like iPhones and MacBooks, after which the student is expected to strictly follow the institute's marketing instructions.

The CLAT 2026 controversy is not an isolated case, but part of a larger, recurring pattern where LegalEdge tries to project an unusually high number of CLAT toppers every year—especially in the Top 10 AIRs—through selective and managed claims.

Rajat Maloo, AIR-1 CLAT 2017, was a student of Law Prep's CLAT coaching in Jaipur. His association with Law Prep is well-documented and publicly verifiable. LegalEdge began claiming him as their topper only after Karan Mehta, co-founder of LegalEdge, just clicked a selfie with him at his residence. That single interaction was later projected as a full coaching association, despite Rajat Maloo having no formal academic link with LegalEdge.

LegalEdge is a heavily funded company. Once an institute takes large investor money, the pressure changes completely. The focus slowly moves away from teaching and shifts towards numbers, projections, growth decks, and future funding rounds. In such a setup, showing consistent Top 10 AIR every single year becomes less about academics and more about convincing investors that the edtech model is working.”

31. The defamatory content is claimed to already have attracted approximately 2,44,000 subscribers, establishing that the defendants have been able to achieve their ultimate malicious object of lowering the reputation of the plaintiffs, causing tarnishment of their brand name and infringing the trade name of the plaintiffs. The timing with which such defamatory videos, reels, posts and blogs have been uploaded i.e. immediately after the CLAT



2026 results, indicates that it was with the clear intention to cause irreparable damage and financial loss to the plaintiff no.1.

32. Plaintiff no.2 claims that its mark “LegalEdge” is a registered trademark under Class 41 and is being used since the year 2011 for the goods and services in relation to education, including providing training; providing online training, online education services, legal education services, coaching (education and training), correspondence courses, academies (education), conducting distance learning at various levels of instruction; Education information; teaching / educational / instruction services, vocational guidance (education or training advice), arranging and conducting seminars and workshops (training).

33. Predicated on the above, the plaintiffs seek an *ex-parte ad-interim* injunction and other reliefs.

34. This Court has heard Mr. J. Sai Deepak, learned senior counsel for the plaintiffs, perused the pleadings and examined the documents on record.

35. The contents of the blogs and various screenshots of the posts, video reels etc. appear to be, at this stage, *prima facie* disparaging to the extent that they appear to be an attempt to bring to disrepute the goodwill and reputation garnered by the plaintiff nos.1 and 2 over the last many years. Though, it appears to be a case of acrimonious professional rivalry between plaintiff nos.1 and 2 on one hand and the defendant nos.1 and 2 on the other, however, indulging in such statements which tend to lower the image of a rival, in such circumstances, cannot be countenanced. The plaintiffs relied upon the contents of the FIR in order to support their case, however, since the FIR itself is a subject matter of cognizance by the High Court of Rajasthan at Jodhpur and the proceedings in the FIR are stated to have been stayed, it appears appropriate not to consider such material, at this stage.

36. The blogs, posts, and the reels do indicate that the defendants have



openly referred to not only the plaintiff no.1 but also to plaintiff no.3 as being part of an evil design floated by the plaintiff nos.1 and 2, and does not appear to be justified, at this stage. The contents, including references to and the AI generated photographs etc. of the plaintiff no.3 being associated with defendant nos.1 and 2 also appear to this Court to be unjustified. The unauthorised use of the trademarks of the plaintiffs in such posts and video reels etc., to depict and portray the plaintiffs' institute in a poor light and convey that its services are substandard, appears to constitute disparagement. It appears that the turf war between plaintiff nos.1 and 2 on one hand and defendant nos.1 and 2 on the other has encompassed and subsumed the plaintiff no.3 as a bait.

37. Though it was extensively argued that the cause of action is common to all the three plaintiffs, however, on the anvil of the aforesaid observations, this Court is not convinced that plaintiff no.3 would have anything in common between the plaintiff nos.1 and 2 or the defendant nos.1 and 2. Clearly, her situation seems to be that of a pawn. No doubt, that the video reels of the defendant no.2 at the initial stage did not contain, in the opinion of this Court, any defamatory material *qua* the plaintiff no.3, however, the later posts or blogs etc., tend to insinuate certain unsavoury contents *qua* the plaintiff no.3.

38. Be that as it may, Plaintiff no.3 appears to have clarified to defendant nos.1 and 2 not to drag her name in this controversy, and also had by her video dated 06.12.2025 clearly associated her success to the plaintiff nos.1 and 2. In that situation, it was not appropriate for the defendant nos.1 and 2 to carry out any campaign, whether defamatory or otherwise, in the name of plaintiff no.3.

39. It is made absolutely clear that the aforesaid observations, so far as plaintiff no.3 is concerned, is not at all based or predicated on the alleged



“personality rights of the plaintiff no.3”. In case any and every success, or a milestone achieved is held to be sufficient to be raised to the level of a “personality right”, it would lead to absurdity and incongruity. If such interpretation is carried forward, then every aspirant, candidate, student, citizen of this country, who achieves or is declared as a top ranker in every stage of examination, would be entitled to protection of their “personality rights”. Though the Courts have not been able to concisely or precisely define “personality rights”, however, it is prudent to avoid such enlargement and widening of the scope to the levels of incongruity and absurdity. Of course, this is not to say that the individual achievers who may have achieved continuous top rank results over many years in various examinations, received awards in sporting events, musical maestros, artists of repute, business persons recognised globally or countrywide, political or religious leaders and such like persons in other spheres of life etc., may not have, what may constitute “personality rights”, yet it cannot be a sole or a single instance which would lend credence to a person to agitate violation of “personality rights”. The threshold cannot be brought down to individual events, though, that by itself may also not be a bar and may be assessed or ascertained on a case to case basis.

40. This Court is fortified in its view taken in the seminal judgment authored by S Ravindra Bhat, J (as His Lordship then was) of this Court in CS(OS) 893/2002 titled “***D.M. Entertainment Pvt. Ltd. vs. Baby Gift House and Ors.***” decided on 29.04.2010. The relevant portion is extracted hereunder:

“12. The plaintiff contended that the character's potential being the artist's popularity to attract customers; on the basis of perceived attributes which is contributed by his reputation is the basis for its trademark and other commercial exploitation. On this aspect, the Bombay High Court, in Star India Private Limited v. Leo Burnett (India) Pvt. Ltd. MANU/MH/1030/2002 : 2003 (27) PTC 81 (Bom) was relied upon; that judgment explained the



position thus:

Character merchandising involves the exploitation of fictional characters or the fame of celebrities by licensing such famous fictional characters to others. The fictional characters are generally drawings in which copyright subsists, e.g., cartoon and celebrities are living beings who are otherwise very famous in any particular field, e.g.; film stars, sportsmen. It is necessary for character merchandising that the characters to be merchandised must have gained some public recognition, that is, achieved a form of independent life and public recognition for itself independently of the original product or independently of the milieu/area in which it appears. Only then can such character be moved into the area of character merchandising. This presumes that the character has independently acquired such reputation as to be a commodity in its own right independently of the goods or services to which it is attached or the field/area in which it originally appears.

Similar views were expressed recently, by this Court, in Chorian Rights Limited v. Ishan Apparel and Ors. CS(OS) 1154/2009 in this aspect.

13. *To avail the right against the infringement of right to publicity, the plaintiff must be "identifiable" from defendant's unauthorized use. In this instant case, the evidence on record very well establishes the primary requirement. As a secondary consideration, it is necessary to show that the use must be sufficient, adequate or substantial to identify that the defendant is alleged to have appropriated the persona or some of its essential attributes. The right of publicity protects against the unauthorized appropriation of an individual's very persona which would result in unearned commercial gain to another. In the present instance, the commercial use of an individual's identity is intended to increase the sales of product by fusing the celebrity's identity with the product and thereby the defendants were selling those dolls, on the basis of publicity value or goodwill in the artist's persona into the product i.e. doll. In Ali v. Playgirl Inc. 447 F Supp 723, it was observed that;*

The distinctive aspect of the common law right of publicity is that it recognizes the commercial value of the picture or representation of a prominent person or performer, and protects his proprietary interest in the profitability of his public reputation or persona.

A similar view is echoed in Onassis v. Christian Dior - New York Inc. 472 NYS 2d 261;

No one is free to trade on another's name or appearance and claim immunity because what he is using is similar to but not identical with the original.

14. *The right of publicity can, in a jurisprudential sense, be located with the individual's right and autonomy to permit or not permit the commercial exploitation of his likeness or some attributes of his personality. However, a*



word of caution has to be expressed here. In a free and democratic society, where every individual's right to free speech is assured, the over emphasis on a famous person's publicity rights can tend to chill the exercise of such invaluable democratic right. Thus, for instance, caricature, lampooning, parodies and the like, which may tend to highlight some aspects of the individual's personality traits, may not constitute infringement of such individual's right to publicity. If it were held otherwise, an entire genre of expression would be unavailable to the general public. Such caricature, lampooning or parody may be expressed in a variety of ways, i.e. cartoons in newspapers, mime, theatre, even films, songs, etc. Such forms of expression cannot be held to amount to commercial exploitation, per se; if the individual is of the view that the form of expression defames or disparages him, the remedy of damages for libel, or slander, as the case may be, would then, is available to him."

(emphasis supplied)

41. That said, having regard to the afore-stated observations in the paragraphs above, it appears that the defendants have indeed, *prima facie*, carried out a defamatory campaign which appears to be disparaging and is clearly avoidable. The reference by the defendant nos.1 and 2 to the plaintiff nos. 1 and 2 and use of the trademark "LegalEdge" in their blog, posts, video reels, that too, without permission, is a clear unauthorized, unpermitted use of such trademarks, which will constitute infringement. The statements appear to be made wilfully to bring disrepute to the goodwill, reputation and standing of the plaintiff nos.1 and 2 and would constitute disparagement. It would be appropriate, therefore, to pass necessary orders protecting the rights of the plaintiffs.

42. Accordingly, the following directions are passed:

A. Defendant nos.1 to 3 are restrained from continuing to publish/host infringing and defamatory content against the plaintiffs, including digital posts, advertisements, and social media publications on all online platforms, including but not limited to YouTube, including the defamatory video titled "CLAT 2026 AIR 1 Geetali Gupta Controversy Exposed" and <https://youtu.be/AU3Q27-BA4I?si=rQDK7JpsnO11qa>,



Instagram, and other social media handles or websites controlled or operated by the defendants;

- B. Defendant nos.1 to 3 are restrained from using images, content, and advertisements of or in the name of plaintiff No.3, including all social and digital media posts and photographs generated by Artificial Intelligence or otherwise;
- C. Defendant nos.1 to 3, their partners, associated/affiliated companies and entities, subsidiaries, holding companies, directors, wholesalers, distributors, or proprietors, as the case may be, its principals, employees, agents, associates, servants, assignees, substitutes, representatives and all persons acting for or through them are restrained from creating, publishing, uploading, sharing, transmitting, communicating to the public and/or disseminating their agents, employees, representatives, assigns, or anyone acting on their behalf, from publishing, circulating, displaying, or otherwise communicating any content that is disparaging, infringing, defamatory, or derogatory in nature, and which targets or tarnishes the Plaintiffs' registered brand "LegalEdge";
- D. Defendant nos.1 to 3, its agents, employees, representatives, or any person acting under its authority, are restrained from deleting, destroying, altering, or tampering with any internal data, records, correspondences, emails, documents, files, or digital content relating to or forming the basis of the campaign designed and executed against the plaintiff pending the final disposal of the present suit;
- E. Defendants (Google and Meta i.e., defendants nos.4 and 5) are directed to disable, block access to, remove or suspend all



disparaging and defaming posts, listings, accounts, videos, and contents, that is uploaded by the defendant nos.1, 2 and 3 either jointly or individually as well as the infringing URLs identified by the plaintiff in Document-A of the plaint, within 72 hours of the uploading of this order.

43. Issue notice.

44. Let a reply to this application be filed by the defendants within four weeks from service. Rejoinder, thereto, if any, be filed within two weeks thereafter.

45. Compliance of Order XXXIX Rule 3 of CPC shall be done within ten days from date.

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46. Let the plaint be registered as a suit.

47. Upon filing of the process fee, issue summons of the suit to the defendants through all permissible modes.

48. The summons shall state that the written statement shall be filed by the defendants within 30 days from the date of the receipt of summons. Alongwith the written statement, the defendants shall also file an affidavit of admission/denial of the documents of the plaintiffs, without which the Written Statement shall not be taken on record.

49. Liberty is granted to the plaintiffs to file replication, if any, within 30 days from the receipt of the written statement. Along with the replication filed by the plaintiffs, an affidavit of admission/denial of the documents of defendants be filed by the plaintiffs, without which the replication shall not be taken on record.

50. In case any party is placing reliance on a document, which is not in their power and possession, its details and source shall be mentioned in the list of reliance, which shall also be filed with the pleadings.



51. If any of the parties wish to seek inspection of any documents, the same shall be sought and given within the prescribed timelines.
52. List before the Joint Registrar (Judicial) on 14.07.2026 for completion of service and pleadings.
53. List before the Court on 24.08.2026.

TUSHAR RAO GEDELA, J

APRIL 13, 2026/anj