

amicus

An e-newsletter from
Lakshmikumaran & Sridharan, India

June 2021 / Issue-117

Contents

Article

Coverage v. Disclosure – IPAB decides on
what amounts to coverage and disclosure.....2

Ratio Decidendi4

News Nuggets.....7

June
2021





Article

Coverage v. Disclosure – IPAB decides on what amounts to coverage & disclosure

By Eeshita Das and Dr. Parul Varshney

The Intellectual Property Appellate Board ('IPAB') last year allowed the appeal challenging the revocation of Indian Patent No. 276026¹ (IN'026) by the Deputy Controller of Patents & Designs, New Delhi² ('Respondent No. 2') following post-grant opposition proceedings initiated by Natco Pharma ('Respondent No. 3'). The IPAB set aside the revocation order as being 'devoid of merit'. The Respondent No. 2 had revoked IN'026 on the ground of lack of novelty, lack of inventive step, and under the provisions of Section 3(d) of the Patents Act, 1970 ('Act').

The IPAB examined issues with respect to coverage and disclosure, novelty and obviousness as well as timelines for filing of evidence. It reiterated the judgment rendered by the Supreme Court in *Novartis case*³ with respect to some important legal principles, especially in the context of coverage v. disclosure, emphasizing that coverage cannot go beyond disclosure, i.e., what is covered by a patent can only be limited to what is disclosed in the patent.

Facts leading up to the impugned order

The Appellant's IN'026 was granted with claims 1-7. The claims covered a compound having the International Non-Proprietary Name (INN), Ceritinib⁴, relating to anaplastic lymphoma kinase (ALK) inhibitors, that is useful for the treatment of non-small cell lung cancer.

The Respondent No. 3 instituted post-grant opposition proceedings on the grounds of lack of novelty, lack of inventive step, insufficiency of disclosure, for falling under the scope of Section 3(d) and Section 8 of the Patents Act. The Respondent No. 2 conducted hearings on the merits of the opposition and revoked the patent although the Opposition Board had recommended to dismiss the revocation application.

For the lack of novelty, the Respondent No. 2 held that the two cited prior arts, Indian Patent No. 232653 (IN'653) and Indian Patent No. 240560 (IN'560) covered the structure as claimed in IN'026.

With respect to lack of inventive step, the Respondent No. 2 only mentioned that since IN'653 and IN'560 were novelty destroying documents, IN'026 lacked inventive step in view of these prior arts as well. The Respondent No. 2 also mentioned that since IN'026 lacked novelty and inventiveness, therefore IN'026 fell under the ambit of Section 3(d) of the Act as the Appellant had not provided any efficacy data.

Further, the Respondent No. 2 held that since both the parties filed additional evidence after the hearing and written submissions despite being instructed not to do so, the documents were not to be taken on record. Despite this assertion, it referred to a document filed by the Respondent No. 3 (seeking a Patent Term Extension (PTE) in the USA by the Appellant) while making the decision to revoke the patent.

¹Patent Application No. 3951/DELNP/2009, titled 'Compounds and Compositions AS Protein Kinase Inhibitors'.

²Order revoking Patent No. 276026 dated 16 August 2019

³*Novartis case AG v. Union of India* [2013 (6) SCC 1], *Merck Sharp & Dohme Corporation v. Glenmark Pharmaceuticals Ltd.*

⁴[5-chloro-N2-(2-isopropoxy-5-methyl-4-(piperidin-4-yl)phenyl)-N4-[2-(propane-2-sulfonyl)-phenyl]-pyrimidine-2,4-diamine]

IPAB Order:

Fee payment – Maintainability of post-grant opposition proceedings

The IPAB also noted that initially fee was paid as natural person and only later (much after the last date of filing opposition) balance amount was paid. It held that filing the opposition by a legal entity and paying the prescribed fee of filing opposition with the fee applicable to a natural person was not justified. It observed that since the balance fee was paid much later, the opposition was not maintainable. However, the Board decided not to decide the matter only on this ground as it was not agitated before the Tribunal.

Filing of additional evidence under Rule 60

The IPAB held that any additional evidence that needs to be filed by either party under Rule 60 of the Rules must be filed prior to the date of hearing as fixed under Rule 62 of the Rules. Further, noting that the Respondent No. 3 had filed additional evidence by filing a petition under Rule 138, the IPAB discussed Rule 138 and Rule 60 of the Rules and held that a petition under Rule 138 was not applicable.

After perusing the affidavits, the IPAB held that compound listing in Orange Book for Patent Term Extension (PTE) does not amount to disclosure. It held that requirements of PTE are different from those of novelty and inventive step and should not be mixed. The IPAB further held that the Respondent No. 2 relied on two cited prior arts to attack 'novelty' of the subject patent by picking suitable equivalent substitutions, keeping inventive structure of the subject patent IN'026 in sight. It noted that in order to demonstrate lack of novelty, the anticipatory disclosure must be entirely contained within a single document, which was not the case here, as the Respondent No. 2 compared some claims from the first prior art IN'653 and one claim with IN'560. It noted that the Formula 2 of IN'026 was never exemplified either

in the description or claims of both these prior arts IN'653 or IN'560. The IPAB was hence of the view that the cumulative effect of unclear and ambiguous prior arts disclosures cannot be taken into consideration for destruction of 'novelty'. In addition to this, it was emphasized that a generic disclosure cannot impugn the novelty of a specific claim.

On inventive step, the IPAB noted that during the prosecution of the impugned patent, GSH trapping assay data was submitted by the Appellant which demonstrated that the claimed compound produced less percentage of reactive adducts due to the presence of the C-C bond as compared to the C-N bond, thus proving non-obviousness. These arguments were also accepted by the Controller who granted the patent IN'026. The IPAB stated that all the documents considered during the examination and grant of the patent were used during the post-grant opposition. Thus, no new facts should have been considered at the post-grant proceedings which were not considered during the examination and grant of the impugned patent.

Recommendation of the Opposition Board

Regarding the recommendation of the Opposition Board, the IPAB held that the Respondent No. 2 ought to have considered the view of the members of the Opposition Board. It noted that if at all the Respondent No. 2 was to defer from the opinion of the Opposition Board, the point of disagreement should have been annotated in the impugned order, which was not the case.

The IPAB also held that the other grounds such as 'lack of inventive step', objection under Section 3(d), and that related to 'insufficiency of disclosure' were also decided without proper reasoning.

Coverage v. Disclosure

The instant IPAB order relied on the interpretation of the Supreme Court judgement and referred to two particular paragraphs to adjudicate the instant issue: -

Paragraph 138: ... making a distinction between coverage or claim in a patent and the disclosure made therein...

Paragraph 139: ...the coverage in a patent might go much beyond the disclosure thus seem to negate the fundamental rule underlying the grant of patents.'

With regards to paragraph 138, the IPAB observed that the coverage and disclosure discussed therein is of the same patent and not two different patents. Further, referring to paragraph 139 the IPAB observed that the coverage of a claim of a patent cannot go beyond the disclosure of said patent; if the same happens, then it goes against the principles laid down in Section 10(4) and Section 10(5) of the Act. The IPAB emphasized on the Section 10(5) of the Act which clearly states that *'the claim or claims of a complete specification shall relate to a single invention, or to a group of inventions linked so as to form a single inventive concept, shall be clear and succinct and shall be fairly based on the matter disclosed in the specification.'* Thus, for any patent to be patentable, the claims of the patent need to be clear, succinct, and fairly based on the complete specification. During the prosecution of the patent, the Controller needs to

ensure that there is no gap between the coverage of a claim and the disclosure of the patent. In case the coverage goes beyond the disclosure of a patent application or there is a gap, the patent should not be granted in the first place without appropriately rectifying the same. Further, if some matter is covered but not disclosed in a particular patent then that particular patent should be questioned and not a subsequent patent which describes and claims a specific subject matter. Furthermore, claiming that the subject matter of the disputed patent (IN'026) has been covered but not disclosed in a prior art is not apt, since the natural presumption is that any claim that has been covered must also have been disclosed.

The IPAB applied the same principle to the instant case and stated that if the prior arts IN'653 and IN'560 have been granted, the first assumption would be that the claims of these granted patents are fairly based on the complete specification provided with these patents individually. If there was any difference, that should have been addressed by the Controller during the prosecution of IN'653 and IN'560, not during the prosecution of the impugned patent. Therefore, there can never be a huge difference in the coverage and the disclosure of a given patent, since that would be against the law.

[The authors are Patent trainee and Associate, respectively, in IPR Life Science practice at Lakshmikumaran & Sridharan Attorneys, New Delhi]



Ratio decidendi

Trade marks – Separation of family business – Exclusivity of one over another

Merely because in the separation between two branches of the family, the company through

which the family was carrying on business in the subject goods using trade mark 'Black Diamond', fell to the exclusive share of one person, it does not ipso facto lead to the inference that another person had agreed not to carry on business in the subject goods or through companies in his

exclusive share, when the names of latter's companies also had the same mark as component.

In the case involving use of trade mark by two members of the family, the High Court rejected the plea of oral family settlement. It observed that since the business was carried through limited companies, had there been any such settlement, in implementation thereof, there would have been resolutions of the Board of Directors of the companies. The Court noted absence of any such resolution on record.

It also observed that the mark was adopted by the family of the directors of plaintiff and the defendants in 1983 and was used qua all their businesses. It noted that the plaintiff company was incorporated in 2005 and had defendants as directors till 2014 when the plaintiff fell to the share of one of the family members while the defendants exited the Board of Directors. The Court hence rejected the contention that the defendants were not using 'Black Diamond' mark in relation to Class 12 goods. It observed that the defendants were very much part and parcel of the respondent/plaintiff and were as such using the said mark in respect to subject class of goods.

Allowing the appeal of the defendant, the Court also held that closely held companies with only family members as shareholders and directors, are akin to a family partnership and the principles applicable in the judgments on partnerships would be applicable, at least at the interim stage. The Court also noticed that the registration in favour of the plaintiff was not of a word mark but of a label mark and that the differences between the marks of the two were enough to eliminate the possibility of any confusion. [*Black Diamond Track Parts Private Limited v. Black Diamond Motors Private Limited* – Judgement dated 28 May 2021 in FAO (COMM) 41/2021 & CM No.6428/2021, Delhi High Court]

IP rights cannot be allowed to be violated even if drugs for use against Covid

In a suit for alleged infringement of the copyright in the artistic work in the trade dress and attempt to pass off and infringe the trademark of the plaintiff in the word 'Respule', the Madras High Court has advised the defendant to suitably alter not only the trade dress, layout colour combination, design and artistic work on the label but also the words which are deceptively similar to plaintiff's trade mark. The defendant had in its application for vacation of an earlier interim order injuncting them from selling the allegedly infringing goods, prayed that the manufactured products may be allowed to be sold in the market as the medicines were required for treatment of patients with Covid symptom. The defendant had also pleaded that they would adopt a new package/label totally different from the one which was being used by them.

However, affirming its earlier interim order of injunction, the Court was of the view that it cannot allow a party to violate another person's intellectual property rights and remain a mute spectator where there also is an attempt to pass-off the goods, notwithstanding the fact that the country is facing unprecedented medical emergency and the drugs were for treating Covid patients. The High Court noted that though it was not argued, the conduct of the defendant bordered with violation of provisions of the Drugs and Cosmetics Act, 1940 and the Rules made thereunder.

The plaintiff was selling its products as 'Budecort Respules' and 'Duolin Respules', while the defendant was using names 'Budex Respules' and 'Duoz Respules' with the trade dress which was, according to the Court, prima facie slavish imitation of the plaintiff's label wrapper. [*Sun Pharmaceutical Industries Ltd. v.*

Cipla Limited – Order dated 26 May 2021 in C.S.No.176 of 2021, Madras High Court]

Anti-suit injunction against foreign proceedings not correct unless affecting Indian proceedings

Relying upon Supreme Court decision in the case of *ONGC v. Western Co. of North America*, the Delhi High Court has reiterated that if the Indian proceedings are not prejudiced by the continuance, or outcome, of the foreign proceedings, then, the foreign proceedings cannot be treated as oppressive, even if they otherwise prejudice one or the other party before the Indian Court. The Court in this regard upheld the contention that the test of ‘oppression’ or ‘vexation’, must be effect-based *vis-à-vis* the Indian proceedings, and not *vis-à-vis* the Indian parties. The High Court also reiterated that the burden to establish that the proceedings in the foreign court are oppressive or vexatious is on the anti-suit injunction applicant.

Observing that in the present proceedings, the plaintiff sought protection against infringement of its Indian trademarks, the High Court was unable to convince itself that similar protection, being sought by the defendants before the Texas Court in respect of the ‘76’ mark, in respect of the usage in the United States whereof they claim exclusive rights, was oppressive or vexatious to the continuance of the present proceedings before the Indian Court. Noting that the trade mark rights are territorial, it held that the defendants were as entitled to protect their US trademarks, as was the plaintiff entitled to protect its Indian trade mark. The argument that the grievance of the defendants being essentially against the plaintiff’s webpage, which was hosted from India, the defendants could have as well sued the plaintiff in India, was held to be unsound.

Setting aside its earlier order granting an anti-suit

injunction [See *L&S IPR Amicus for April 2021, available here*], the Court also observed that even if it were to be assumed that the plaintiff could not, technologically, remove the ‘76’ mark from their webpage only as accessible in the US, that difficulty or hardship cannot justify grant of anti-suit injunction. It noted that pleas, including that of geo-blocking of plaintiff website in US, which legitimately ought to be urged before the foreign Court cannot be urged before the Indian Court as grounds to seek anti-suit injunction. [*Raaj Unocal Lubricants Limited v. Apple Energy Pvt. Ltd.* – Judgement dated 25 May 2021 in CS(COMM) 100/2021, Delhi High Court].

Forum shopping – Afresh filing of suit in different court after withdrawing from another court, fatal

The Delhi High Court has held that withdrawal of the proceedings, even with liberty to file afresh, does not obliterate the proceedings so filed, so as to make the same invisible even for drawing inference of forum shopping therefrom. The Court was of the view that though, once the suit is permitted to be withdrawn with liberty to file afresh, no pleas, on the basis thereof can be taken in the subsequent suit, of Order II Rule 2 of CPC or of *res-judicata* etc., but nothing prevents the Court from, at least at the stage of grant/non-grant of interim relief, taking notice of the said facts to test the bona fides of the respondent/plaintiff.

The High Court observed that the petitioner after having failed to obtain interim relief from the Courts at Bilaspur/Chhattisgarh, chose to try their luck in the Courts at Delhi and with the said design, withdrew the suit at Bilaspur with permission to file afresh. It noted that the said design of the plaintiff indeed bore fruit inasmuch as the petitioner succeeded to get ex-parte injunction restraining the defendants. Strongly condemning the conduct of the petitioner, the

Court held that this amounted to abuse of the process of the Court. Allowing the appeal against the interim order of the commercial court, the High Court also noted that the respondent/plaintiff did not give any plausible reasons for indulging in such conduct. It also observed that the impugned order also did not discuss as to why the plaintiff, in

spite of having indulged in forum shopping, was entitled to interim injunction. [*Black Diamond Track Parts Private Limited v. Black Diamond Motors Private Limited* – Judgement dated 28 May 2021 in FAO (COMM) 41/2021 & CM No.6428/2021, Delhi High Court]



News Nuggets

IP protection for vaccines is enabler and not barrier to vaccine availability: EU Parliament

Stressing that intellectual property protection is a key incentive for innovation and research across the globe, the European Parliament has, in its Resolution dated 10 June 2021, stated that such protection is the basis for voluntary licensing agreements and know-how transfer and is therefore an enabler of, rather than a barrier to, vaccine availability. Emphasising that protection of intellectual property rights, is a constitutional obligation of the European Union and its Member States, the Parliament also cautioned that under a paradigm of unenforceability for patents, companies would have to resort to secrecy or exclusivity to protect their innovations. It noted that an indefinite TRIPS Agreement waiver would pose threat to research finance, especially for researchers, investors, developers and clinical trials.

However, noting taking note of the European Commission's announcement that it is open to the possibility of use of compulsory licensing, the Parliament called on the Commission to provide objective criteria regarding if, when and in which cases it will resort to compulsory licensing. It noted that the TRIPS Agreement does not specify the reasons

that might be used to justify compulsory licensing.

Copyright infringement – Direction to WhatsApp to suspend accounts unauthorisedly circulating film content

The Delhi High Court has granted an *ex parte* interim injunction against various defendants alleged to be unauthorisedly circulating the film '*Radhe: Your Most Wanted Bhai*' through WhatsApp or any other means. The Court noted that as per the printouts (placed on record) of the WhatsApp communications pertaining to the defendants, the account holders, were using the accounts to sell the content of the film and that such use was in complete violation of the terms of the policy of WhatsApp LLC (also a defendant here), as was infringing the copyright of the plaintiff. The High Court further directed WhatsApp LLC to suspend the WhatsApp accounts of specified defendants to ensure that they cease the infringement of the plaintiff's copyright on WhatsApp. However, it may be noted that the direction in Order dated 20 May 2021 in *Zee Entertainment Enterprises Ltd. v. Tejendra Modi* which stated that if the plaintiff brings to the notice of WhatsApp LLC, the use

of any other account for selling infringing copies of the film, WhatsApp LLC should within 24 hours suspend such accounts, was subsequently kept in abeyance by the Court on 1 June 2021. The Court in its later Order found *prima facie* merit in the contention that since the messages between WhatsApp users are protected with an end-to-end encryption protocol, WhatsApp LLC would not be able to review any accounts, reported by the plaintiff in the future, to confirm that they are in fact selling pirated copies of the film in question. According to the Court, it would be appropriate that any further direction for suspension of WhatsApp accounts be issued by the Court.

No requirement to expressly mention phrases ‘prima facie case’ and ‘balance of convenience’ in Interlocutory order

The Madras High Court has observed that legal jargons like ‘*prima facie case*’ and ‘balance of convenience’ need not be expressly mentioned in any interlocutory judgment or whatever is the result of any interim adjudicatory process undertaken, as long as the sense in either case is made out by cogent reasons being indicated in such regard. The Court was of the view that by the mere use of the expression ‘*prima facie case*’ all over an interlocutory order, the order may not be justified. The High Court in the case *Sony Music Entertainment India Pvt. Ltd. v. S Khaja Mohideen* also stated that the lack of the use of the expression will also not render the order vulnerable if the essence of a *prima facie case* is discerned therefrom.

No release of allegedly infringing goods during pendency of injunction application – Court rejects offer of

bank guarantee

The Delhi High Court has rejected the application to allow release of allegedly infringing goods in a case where the applications for injunction, preferred by the plaintiff in the suits under Order XXXIX of the CPC, were being heard by the Court. The Court was of the view that once allegedly infringing products are in the market, there can be no stay against the infringement and even if any stay were to be granted, the exercise would be fundamentally chimerical in nature. Defendant’s plea of maintaining the accounts and to secure the damages of INR 2 crores, as mentioned in the plaint, by way of bank guarantee, was also rejected by the Court. It observed that damages are entirely insufficient as panacea for the holder of a valid patent, which is infringed by another. The Court in the case *FMC Corporation v. Best Crop Science LLP* was of the view that intellectual property has its own sanctity and the prejudice caused even by a single day’s infringement of intellectual property is, in principle, incalculable. The High Court also noted that the Court’s decision in *Astra Zeneca AB v. Intas Pharmaceuticals Ltd.* cannot help the defendants as findings in paras 35.5, 35.6, 36 and 36.2 of the said decision were only in the nature of residual findings.

No confusion between marks ‘Industry’ and ‘Blue Industry’

The United States Court of Appeals for the Federal Circuit has upheld that Trademark Trial and Appeal Board’s decision to reject the opposition filed, against registration of the mark ‘Blue Industry’, by the appellant who owned various ‘Industry’ marks. Both the marks were used in respect of clothing. The Court agreed with the finding of the Board that a consumer

would likely attribute ‘source identifying features’ to the initial word ‘BLUE’ in ‘BLUE INDUSTRY’. The Board had also held that the addition of the word ‘BLUE’ in applicant’s mark meant that the mark as a whole did not bear ‘striking’ resemblance in appearance, sound, meaning or commercial impression to any of the pleaded registered marks. The Court of Appeals in the case *Pure & Simple Concepts, Inc. v. I H W Management Limited* [Decision dated 24 May 2021] was also not convinced by the argument that ‘BLUE’ could only be associated with consumers’ colour preferences rather than a particular brand.

Cross border reputation of law firms

In a case involving alleged infringement of the trade mark in the name of a law firm, the Delhi High Court has held that the contention that the defendant is currently practicing only in Canada, cannot be a ground to refuse the grant of injunction. The Court in its Order dated 2 June 2021 observed that nowadays legal services are rendered across the globe through internet and electronic means and in this internet-driven world, law firms would have a reputation which is not limited by geographical boundaries. It was held that there is a strong possibility of confusion amongst the foreign clients/law firms relating to the two marks which are predominantly identical.

Trade marks – Suffix ‘Rathi’ dominant in mark ‘BCLLP RATHI’

Observing that in the mark ‘BCLLP RATHI’, the prefix ‘BCLLP’, was an abbreviation of the name of the Defendant, the Delhi High Court has held that therefore, the suffix ‘RATHI’, *prima facie* appears to constitute the dominant and distinguishing feature of the mark. According to the Court, by thus using ‘RATHI’ in its mark on the goods which were identical to those which constituted subject

matter of consideration, through an LLP instead of a private limited company as earlier, the Defendants, *prima facie*, had devised a means of contravening the directions contained in Court’s earlier Order. Granting *ex parte ad interim* relief in favour of the plaintiff, the Court restrained the defendant from using trade mark ‘RATHI/ BCLLP RATHI’ or any other mark or label which is identical or deceptively similar to the registered trade mark ‘RATHI’.

Disputes relating to assignment of trade marks are arbitrable

Observing that assignment of trademark does not involve any exercise of sovereign functions of the State, the Delhi High Court has reiterated that it cannot be said that the disputes between assignee and the assignor of trade mark are not arbitrable. The Court noted that the right that was asserted by the plaintiff (assignee) was not a right that emanated from the Trade Mark Act, 1999 but a right that emanated from the agreement between the parties. It observed that the assignment of trademark is by a contract and not by a statutory act. Relying on the Court’s earlier decision in the case of *Hero Electric Vehicles Pvt. Ltd. v. Lectro E-Mobility Pvt. Ltd.*, the High Court allowed the application filed by the defendant under Section 8 of the Arbitration and Conciliation Act, 1996 for referring the dispute between the plaintiff and the defendant to arbitration. The defendant had earlier assigned few trade marks to the plaintiff under an agreement but, on alleged non-fulfilment of certain conditions terminated the same. The plaintiff in the suit *Golden Tobie Private Limited v. Golden Tobacco Limited* had sought injunction against the defendant and stressed that as the trademarks were transferred in perpetuity the dispute was a dispute in rem and cannot be referred to arbitration.

NEW DELHI

5 Link Road, Jangpura Extension,
Opp. Jangpura Metro Station,
New Delhi 110014
Phone : +91-11-4129 9811

B-6/10, Safdarjung Enclave
New Delhi -110 029

Phone : +91-11-4129 9900

E-mail : lsdel@lakshmisri.com

MUMBAI

2nd floor, B&C Wing,
Cnergy IT Park, Appa Saheb Marathe Marg,
(Near Century Bazar)Prabhadevi,
Mumbai - 400025

Phone : +91-22-24392500

E-mail : lsbom@lakshmisri.com

CHENNAI

2, Wallace Garden, 2nd Street
Chennai - 600 006

Phone : +91-44-2833 4700

E-mail : lsmds@lakshmisri.com

BENGALURU

4th floor, World Trade Center
Brigade Gateway Campus
26/1, Dr. Rajkumar Road,
Malleswaram West, Bangalore-560 055.

Phone : +91-80-49331800

Fax: +91-80-49331899

E-mail : lsblr@lakshmisri.com

HYDERABAD

'Hastigiri', 5-9-163, Chapel Road
Opp. Methodist Church,
Nampally

Hyderabad - 500 001

Phone : +91-40-2323 4924

E-mail : lshyd@lakshmisri.com

AHMEDABAD

B-334, SAKAR-VII,
Nehru Bridge Corner, Ashram Road,
Ahmedabad - 380 009

Phone : +91-79-4001 4500

E-mail : lsahd@lakshmisri.com

PUNE

607-609, Nucleus, 1 Church Road,
Camp, Pune-411 001.

Phone : +91-20-6680 1900

E-mail : ls pune@lakshmisri.com

KOLKATA

2nd Floor, Kanak Building
41, Chowringhee Road,
Kolkatta-700071

Phone : +91-33-4005 5570

E-mail : lskolkata@lakshmisri.com

CHANDIGARH

1st Floor, SCO No. 59,
Sector 26,

Chandigarh -160026

Phone : +91-172-4921700

E-mail : lschd@lakshmisri.com

GURUGRAM

OS2 & OS3, 5th floor,
Corporate Office Tower,
Ambience Island,

Sector 25-A,

Gurgaon-122001

Phone : +91-124-477 1300

E-mail : ls gurgaon@lakshmisri.com

PRAYAGRAJ (ALLAHABAD)

3/1A/3, (opposite Auto Sales),
Colvin Road, (Lohia Marg),
Allahabad -211001 (U.P.)

Phone : +91-532-2421037, 2420359

E-mail : lsallahabad@lakshmisri.com

KOCHI

First floor, PDR Bhavan,
Palliyil Lane, Foreshore Road,
Ernakulam Kochi-682016

Phone : +91-484 4869018; 4867852

E-mail : lskochi@lakshmisri.com

JAIPUR

2nd Floor (Front side),
Unique Destination, Tonk Road,
Near Laxmi Mandir Cinema Crossing,
Jaipur - 302 015

Phone : +91-141-456 1200

E-mail : lsjaipur@lakshmisri.com

NAGPUR

First Floor, HRM Design Space,
90-A, Next to Ram Mandir, Ramnagar,
Nagpur - 440033

Phone: +91-712-2959038/2959048

E-mail : lsnagpur@lakshmisri.com

Disclaimer: *IPR Amicus* is meant for informational purpose only and does not purport to be advice or opinion, legal or otherwise, whatsoever. The information provided is not intended to create an attorney-client relationship and not for advertising or soliciting. Lakshmikumaran & Sridharan does not intend to advertise its services or solicit work through this newsletter. Lakshmikumaran & Sridharan or its associates are not responsible for any error or omission in this newsletter or for any action taken based on its contents. The views expressed in the article(s) in this newsletter are personal views of the author(s). Unsolicited mails or information sent to Lakshmikumaran & Sridharan will not be treated as confidential and do not create attorney-client relationship with Lakshmikumaran & Sridharan. This issue covers news and developments till 19 June 2021. To unsubscribe, e-mail Knowledge Management Team at newsletter.ipr@lakshmisri.com

www.lakshmisri.com

www.gst.lakshmisri.com

www.addb.lakshmisri.com

www.lakshmisri.cn