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Dear Reader

It gives me great pleasure to address you through this **100th issue of IPR Amicus**. I have always believed that knowledge is a wealth that should be shared. We began this journey in August 2011 recalling the Sanskrit verse that the unique wealth of knowledge increases with spending or expending. I hope over these years we have been able to give business critical inputs and academic inputs in a timely manner. These days information is available practically everywhere but value addition results when relevant information is properly digested and communicated in a systematic manner. We intend to continue this endeavour. Your feedback to improve the newsletter is welcome.

Thank you.

Warm regards

V. Lakshmikumaran

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Article

Patentability of computer related inventions

By **Dipan Banerjee and Dr. Gaurav Gupta**

In the case of *Ferid Allani v. Union of India and Ors.*, a single judge of the Delhi High Court vide its order dated 12 December 2019, directed the Indian Patent Office (IPO) to re-examine the petitioner's Indian patent application in the light of observations of the court on patent eligibility of computer-related inventions (CRIs). The court further ordered the IPO to provide an opportunity of a hearing to the petitioner and decide the Indian patent application within two months from the date of the court's order.

Facts of the Case

The petitioner, *Ferid Allani*, a citizen of Tunisia, filed the Indian National Phase patent application No. IN/PCT/2002/00705/DEL with the IPO on 17 July 2002. The Indian application included both method and device claims relating to “*accessing information sources and services on the web*”. The IPO, after examining the Indian patent application, issued a First Examination Report (FER) on 21 February 2005 where the method claims were objected for being directed to computer program *per se* under Section 3(k) of the Patents Act, 1970 and the device claims were objected for lacking novelty and inventive step over the prior arts cited in the FER. The petitioner responded to the FER along with claim amendments. An order was issued by the IPO on 21 September 2005, which stated that despite the claim amendments, the Indian patent application was claiming a subject matter excluded (or non-patentable) under Section 3(k).

Subsequently, a writ petition was filed by the petitioner before the Delhi High Court challenging the contentions raised in the order dated 21

September 2005. On 25 February 2008, a single judge of the Delhi High Court directed that the IPO shall give reasons for the rejection, and accordingly the matter was remanded back to the IPO. The petitioner was given four weeks' time to respond against the IPO's order. Further, the court also directed that the petitioner shall be given an oral hearing, in accordance with the provisions of the Patents Act before deciding the petitioner's Indian patent application. Subsequently, upon hearing the petitioner, the IPO again rejected the Indian patent application vide a detailed order dated 18 November 2008 concluding that method claims 1 to 8 were directed to computer program *per se* and were thus excluded (or non-patentable) under Section 3(k) and device claims 9 to 14 lacked novelty and inventive step.

The petitioner appealed to the Intellectual Property Appellate Board (IPAB) against the IPO's detailed order of 18 November 2008. The IPAB dismissed the appeal vide its order dated 25 March 2013 citing lack of technical effect and technical advance in the claimed invention and in effect confirming the IPO's rejection. The present case is a writ petition challenging the IPAB order dated 25 March 2013.

Contentions of the Parties

The petitioner contented that the rejection of the Indian patent application was incorrect as the Indian patent application clearly discloses a technical effect and a technical advancement. To support this contention, the petitioner relied upon various parts of the patent specification, and various guidelines issued by the IPO in respect of

examination of CRIs. The petitioner submitted that the claimed invention enables more efficient data base search strategies, more economical use of system memory or higher speed of accessing stored data, etc., which constitute “technical effect” and thus the claimed invention does not fall under Section 3(k) and shall be allowed.

The respondents argued that the High Court in its writ jurisdiction cannot re-consider technical arguments, where the IPAB, which is a technical tribunal, has already taken a view in the matter based on the technical arguments.

Decision of the Court

After hearing the arguments of the parties and relying upon Section 3(k) of the Patents Act, 1970, various guidelines issued by the IPO in respect of examination of CRIs¹, legislative history of Section 3(k) including Report of the Joint Committee on the Patents (Second Amendment) Bill, 1991, and *pari materia* provisions from the European Union, such as *Article 52 of the European Patent Convention*, the court allowed the petition. The IPO was directed to re-examine the Indian patent application taking into account the observations of the court. Based on the re-examination, the IPO was directed to issue a decision on the Indian patent application within a period of two months from the day of the pronouncement of the present order, after granting a hearing to the petitioner.

The court observed and reiterated the previously established principles that patentability of CRIs shall be examined based on presence of

“*technical effect*” and/or “*technical contribution*”. If the invention demonstrates a “technical effect” or a “technical contribution” it is patentable even though it is based on a computer program. The court pointed out that the effect which the computer programs produce is crucial in determining patentability. Further, the court opined that the term “technical effect” shall be interpreted according to judicial precedents, *pari materia* provisions, and practices of patent offices of foreign jurisdictions. While discussing the issue of patentability of CRIs, relying on the Report of the Joint Committee on the Patents (Second Amendment) Bill 1991, the court observed that the words ‘*per se*’ were incorporated in Section 3(k) so as to ensure that genuine inventions which are developed based on computer programs, are not refused patents.

Conclusion

Through the order, the Delhi High Court clearly sets out, and reconfirmed, that for examination of CRIs for patentability, the IPO shall enquire into the technical effect and/or technical contribution of the claimed invention. The order also indicates that for examination of CRIs, the IPO shall take into account all CRI-based guidelines issued by the IPO from time to time, legislative history of Section 3(k), *pari materia* provisions present in other jurisdictions, and the jurisprudence applied across foreign patent offices.

The order also seems to indicate that the same test of patentability, viz., “technical contribution/ technical effect”, may also be applied for CRIs in the field of artificial intelligence (AI) and blockchain technologies.

It appears that the present order reinforces the well-established jurisprudence with respect to CRIs, according to which any invention having a

¹ Draft Guidelines for Examination of Computer Related Inventions, 2013, Guidelines for Examination of Computer Related Inventions, 2016, and Revised Guidelines for Examination of Computer Related Inventions, 2017

technical contribution or technical effect is not merely a computer program, although the invention is implemented using a computer program. This is similar to the findings of the Delhi High Court in the case of *Telefonaktiebolaget LM Ericsson v. Intex*

Technologies (India) Limited [CS(OS) No.1045/2014].

[The first author was Principal Associate while the second author is a Joint Director in IPR practice in Lakshmikumaran & Sridharan in Bengaluru and New Delhi, respectively]



Ratio decidendi

Expiry of patent – Effect on suit for extended passing off

In a suit involving action for extended passing off and to prevent the respondent from using the appellants' data and improper reference to its drug 'Trastuzumab', where the appellant's patent had expired, a 3-Judge Bench of the Supreme Court has set aside Division Bench decision of the High Court which had observed that there was possibility of the suit being filed with the objective of stifling competition. The Supreme Court was of the view that the expiry of the appellants' patent right on the drug 'Trastuzumab' may not have any direct bearing on the contention raised in the suit. The High Court in its Order impugned before the Apex Court had held that in the face of the expiry of the patent in favour of the plaintiff, their *locus standi* to file the suit was a relevant issue to be determined. The High Court had accordingly granted relief to the respondent in marketing their product 'TrastuRel' on the same terms, as was granted to others.

The Supreme Court also observed that the High Court DB failed to simultaneously consider and dispose of the pending appeals and the interim applications filed by the plaintiff, and was singularly concerned with taking up a specific

interim application only, contrary to the directions passed by the Supreme Court in its earlier order. It held that the High Court, without considering the appellants' interim application, had clearly shut out any scope for the appellants' application to be heard and in the process had made an order on that application. The High Court order was held as erroneous also because the position prevailing since last three and a half years (pursuant to the Single Judge's order) was disturbed by the DB without considering the issue of balance of convenience. [*Genentech Inc. & Ors. v. Drug Controller General of India & Ors.* – Judgement dated 17-12-2019 in Civil Appeal No. 9491 of 2019, Supreme Court Larger Bench]

Copyrights – Rights of author even after assignment

Observing that Section 57 of the Copyright Act gives protection and ensures the right of the author for his creation even after its assignment, the Kerala High Court has directed the respondent to remove the name of another person as script writer in the movie 'Mamankam'. The Court was *prima facie* of the view that the author of the screenplay, script etc., of the movie was the appellant and that his right for his creation was safeguarded and protected by the

Copyright Act. It noted that assignment of the work by the author will not exhaust his legal right to claim authorship over it.

The High Court, however, rejected the plea of blocking the release of the film. It observed that as all the arrangements had been made by the Producer, if the release was postponed for the reason that the name of the scriptwriter was shown as different, huge damages would be caused to the respondent-Producer. The Court noted that though the appellant had a case that the film that is ready for release is the distorted version, as mutilation and modification of the original script was done by the respondent, but, that apprehension is a larger question which could be decided only after a full-fledged trial by the trial court. [*Sanjeev Pillai v. Venu Kunnapalli* – Judgement dated 11-12-2019 in FAO.No.191 of 2019, Kerala High Court]

Patents – Post-grant opposition – New evidence cannot be filed once Controller fixes date of hearing

Observing that the provisions of the Patents Rules, 2003 place enormous sanctity on the two-stage decision making process in a post-grant opposition, the Delhi High Court has held that while additional evidence is permissible under Rule 60 of the Patents Rules after recommendations are given by opposition board, the same cannot be filed once the date of hearing has been fixed by the Controller. It was held that filing of additional evidence would be permissible in exceptional cases with the leave or direction of the Controller, but in any event, the said filing can be done only prior to the hearing being fixed under Rule 62.

The Court further held that though Rule 62(4) allows filing of publication 5 days prior to the hearing, the same is not with respect to evidence or additional lab reports but it is regarding

“publication” which is already available in public domain but was overlooked or not presented earlier. The High Court also held that both the exceptional circumstances (as provided in Rules 60 and 62) ought to be treated as exceptions and not the rule. It further stated that the Members of the opposition board may be present in the hearing if any further evidence is given by either party under Rule 62 and publication is cited at the hearing.

A Single Judge of the Court noted that the scheme of the Rules envisages that the Opposition Board ought to consider all the pleadings and documents prior to giving its recommendation to the Controller, and that under usual circumstances, there should not be any variation between the material being considered by the Opposition Board and the Controller. It held that in terms of Rule 60, the hearing as contemplated in the said rule would be the first notice of hearing, as this would ensure that parties do not unduly delay hearing by seeking adjournments and utilizing adjourned period to dig up more evidences.

It was further observed that the Opposition Board ought to give its recommendations within three months after the final rejoinder by the opponent is received under Rule 59, and that after the receipt of the recommendations of the Opposition Board, a hearing ought to be fixed within three months thereafter. Lastly, observing that the pendency of post-grant oppositions delays adjudication of infringement suits, if any, in respect of the patent and keeps the rights of the Patentee under a cloud or in doubt, the Court directed the Patent office to ensure that post-grant oppositions are decided expeditiously. [*Pharmacyclics LLC v. UoI* – Order dated 20-11-2019 in W.P.(C) 12105/2019 & CM APPLs. 49593/2019, 49594/2019, 49595/2019, Delhi High Court]

Copyrights – Investigating Officer of a crime and prosecution has no copyright in charge sheet filed and/or investigation done

A Single Judge of the Delhi High Court has held that, *prima facie*, the Investigating Officer of a crime and prosecution has no copyright in the charge sheet filed and/or investigation done. The Court also held that, *prima facie*, if the officer narrates the same in print or otherwise elsewhere, he would not have a copyright therein also. The Court, however, observed that it cannot be said with certainty at the interim stage, whether Chapter 7 of the book with which the suit was concerned constitutes an “original literary work” or is merely a reproduction of the case files of the crime and its prosecution. It held that if it turns out that the Chapter is merely a reproduction, with no innovative thought and creativity, it would not qualify as a copyrighted work.

Noting that plaintiff had not even attempted to make any comparison of said Chapter with the book of the defendant No.1 or between Chapter 7 and the film script of the web series of the defendant No.2, the Court held that no cause of action on the ground of infringement of copyright was found pleaded in the plaint. The Court was also of the view that as both impugned Chapter 7 and the book of the defendant No.1 along with the web series of the defendant No.2, were premised on the Syed Modi Murder case which was in public domain, no case for infringement of copyright will be made out. It observed that the crime was as iconic in the history of Indian crimes as the Nanavati Murder case on which four films and one web series having been produced, and hence there was no *prima facie* case of infringement of copyright even if any was pleaded.

Rejecting the plea for interim relief and vacating *ex-parte* ad-interim order, the Court also noted

that there was difference between Chapter 7 and the book of defendant No. 1, and that the Defendant No.2 had already made and released the web series, at a huge cost would suffer irreparable loss, whereas the plaintiff, even if ultimately succeeds, can always be compensated in monetary terms. [*Giant Rocket Media and Entertainment Pvt. Ltd. v. Priyanka Ghatak and Ors.* – Order dated 7-1-2020 in CS (COMM) 736/2019, Delhi High Court]

Invention demonstrating technical effect/contribution patentable even if based on a computer program

The Delhi High Court has held that if an invention demonstrates a technical effect or has a technical contribution it is patentable even though it may be based on a computer program. The Court observed that the words ‘*per se*’ were incorporated in Section 3(k) of the Patents Act as a conscious step to ensure that genuine inventions which are developed based on computer programs are not refused patents. Reiterating that the bar on patenting was in respect of ‘computer programs *per se*....’ and not all inventions based on computer programs, the Single-Judge of the High Court observed that in today’s digital world when most inventions are based on computer programs, it would be retrograde to argue that all such inventions would not be patentable.

The Court was of the view that the effect that computer programs produce, including in digital and electronic products, is crucial in determining the test of patentability. It was also noted that the words ‘*per se*’ read along the Report of the Joint committee on the Patents (Second Amendment) Bill 1999 suggest that the legal position in India is similar to the provision under Article 52 of the European Patent Convention. Petitioner’s patent application was directed to be re-examined and decided within two months after granting a hearing to the patent applicant. [*Ferid Allani v. UoI* - W.P.(C) 7/2014, decided on 12-12-2019, Delhi High Court]

Trademarks – Word ‘Shyam’ whether generic – Delay in action to restrain use of mark is not acquiescence

Observing that the appellant was the registered owner of the trademark ‘Shyam’ and that the respondent did not produce any significant evidence to show that it was carrying on business using subject trademark, based on sales figures, prior to registration of the appellant’s mark or prior to the date from which the appellant claimed first user of the mark, the Calcutta High Court has found *prima facie* case in favour of the appellant.

It also observed that the respondent was not able to establish, even *prima facie* that indeed the name ‘Shyam’ refers to God only, is not distinctive of the appellant, is generic and common. Court also noted that there was no authority, or no authority was brought to its notice laying down that God’s name cannot be registered as a trademark. Judgement in *Skyline Education Institute (India) (P) Ltd v. S.L. Vaswani* where it was held that a name or surname, if distinctive of the goods and reputed by virtue of a

large scale of products of a particular manufacturer, may be registered, was relied upon.

On the question of acquiescence, the High Court observed that although appellant delayed his action to restrain the defendant from using the mark, he cannot be accused of acquiescing to the use of the mark. Supreme Court’s judgement in *Power Control Appliances v. Sumeet Machines (P) Ltd.*, holding that acquiescence would arise only out of the positive acts and not merely by silence or inaction, was relied upon. Court directed the respondent to clear the existing stock, while maintaining accounts for the same and held that the order of injunction shall operate from the 1st of May 2020. It, however noted that if IPAB decides the rectification proceedings in favour of the respondents, they will at liberty to file for vacation of order of injunction. [*Shyam Steel Industries Ltd. v. Shyam Sel & Power Ltd.* - APO No. 91 of 2019 with CS 63 of 2019, decided on 24-12-2019, Calcutta High Court]



News Nuggets

Post of Chairman, IPAB cannot be allowed to be left vacant

The Supreme Court has held that although the appointment process of new chairman of IPAB is likely to be completed soon, the post of the Chairman of the Intellectual Property Appellate Board (IPAB) cannot be allowed to be left vacant. The Court in its Order dated

18-12-2019 in the case of *International Association for Protection of Intellectual Property v. Uoi* directed that the last incumbent Mr. Justice (Retd.) Manmohan Singh be allowed to continue as Chairman of IPAB for a period of one year after he attains the age of superannuation. It observed that there was no break in the service.

Sale of second-hand e-books through website constitutes 'communication to public' requiring authorisation by author

Court of Justice of the European Union has ruled that making second-hand e-books available to members of the reading club created by a company on its website amounts to communication to public and attracts infringement in the absence of authorization by the author. The Court in the case of *Nederlands Uitgeversverbond and Groep Algemene Uitgevers v. Tom Kabinet Internet BV* observed that the rule of exhaustion was reserved for tangible objects such as books on a material medium and not e-books as dematerialized digital copies of e-books do not deteriorate with use and are therefore perfect substitutes for new copies on any second-hand market. It also held that irrespective of the fact whether any person retrieved it or not, the act of offering of a work on a publicly accessible website constitutes making available of the work to the public. According to CJEU, the number of people who may have access at the same time or in succession to the same work *via* reading club's platform was substantial and it will be regarded as being communicated to the public.

Recognition of efforts in making of a film – Promissory estoppel

Considering the fact that the Plaintiff (lawyer for the acid attack survivor) was approached by the defendant (director of the film 'Chhappak'), was consulted and that her help/assistance was taken, and that the plaintiff helped in maintaining the integrity and the credibility of the film itself, the Delhi High Court has held that the Plaintiff deserves to be recognized for her 'some part' in the making of the film. The High Court in the case *Fox Star*

Studios v. Aparna Bhat perused the e-mails and the communications exchanged between the parties which showed that the Plaintiff was contacted specifically in the context of the production of the film and that she rendered her assistance in the making of the film. The Court in its Order dated 11-1-2020 observed that the letters, e-mails and WhatsApp messages showed that an expectation was created in the Plaintiff's mind that her inputs and contribution in the making of the film would be adequately acknowledged. It noted that the law is well settled that promissory estoppel can act both as a defence and as a cause of action, and that in the present case, it is the latter. It also observed that in the absence of a contract and payment of consideration, her efforts, skill and labour cannot vest with the producer completely gratuitously.

Copyrights in film script – No monopoly in theme of illegal drug trials

Observing that there cannot be a monopoly on a theme of illegal drug trial or big pharmaceutical companies indulging in it, the Bombay High Court has dismissed the Notice of Motion in the Suit, seeking restraint on the release of the film produced by the defendant. The case involved alleged infringement of copyright in the script of the film, and the Court was of the view that there was no substantial similarity between the two works as the treatment of the subject and the fleshing out of the story and characters was very different. The Court in the case of *Shivani Tibrewala v. Rajat Mukherjee* was of the view that Plaintiff failed to make out a prima facie case of infringement of copyright by the Defendants in the script of the Plaintiff's play.

Defamation and disparagement – Court passes interim injunction against YouTube blogger

The Bombay High Court has, in a detailed order, examined the law of defamation and disparagement and passed a limited interim injunction in favour of Marico (brand name Parachute) and against the YouTube blogger for defaming and disparaging the product Parachute in one of his videos. The High Court held that a social media influencer has higher responsibility to ensure that his statements do not mislead the public and that he is disseminating correct information. The Court noted that the Defendant had not conducted any independent tests and had also not exercised the option of analyzing the plaintiff's product under Section 40 of the Food Safety Standards Act, 2006, in which case the manufacturer would have also got fair opportunity to be heard. Pointing out the difference between 'organic coconut oil' and 'virgin organic coconut oil', the Court held that clear and unambiguous impression given by the Defendant in the impugned video while showing the freeze test that he was comparing the Plaintiffs product with 'organic coconut oil', was false. The Court in the case *Marico Limited v. Abhijeet Bhansali* observed that neither the test conducted by the Defendant in his Impugned Video, nor the articles sought to be relied upon by the Defendant indicated that the statements made and published by the Defendant were true or that any reasonable person could on the basis of such test or articles have believed that the statements constitute the truth or that there was a reasonable possibility of the statements being believed to be true.

Plant Variety Protection – Planting of protected variety and harvesting of fruits when not an act of production or reproduction

Observing that fruit harvested from the trees of the protected variety was not to be used as propagating material for plants of that variety, the Court of Justice of the European Union has held that the planting of such a protected variety and the harvesting of the fruits from plants of that variety is not to be regarded as an 'act of production or reproduction (multiplication)' of variety constituents within the meaning of Article 13(2)(a) of EU Regulation No 2100/94, requiring authorization of plant variety right holder. The Court was of the view that it must rather be regarded as the production of harvested material which requires the authorisation only where that harvested material was obtained through the unauthorised use of variety constituents of the protected variety. The CJEU in the case *Club de Variedades Vegetales Protegidas v. Adolfo Juan Martínez Sanchís*, also observed that such fruit of a plant variety may not be regarded as having been obtained through the 'unauthorised use of variety constituents', where those variety constituents were propagated and sold to a farmer by a nursery in the period between the publication of the application for a Community plant variety right and the grant thereof.

Standard Essential Patents – USPTO issues Policy Statement on remedies

United States Patent and Trademark Office (USPTO) has clarified that Standard Essential Patents (SEPs) should not be treated differently from any other patent, and that all

remedies are available depending on the facts of a case. The new Policy Statement on Remedies for Standards-Essential Patents subject to Voluntary RAND (Reasonable and Non-Discriminatory) or FRAND (Fair, Reasonable and Non-Discriminatory) Commitments, released by USPTO jointly with the National Institute of Standards and Technology and the Department of Justice's Antitrust Division, leaves decisions on remedies for SEPs to relevant tribunals according to generally-applicable patent laws. According to USPTO Press Release dated 19th of December 2019, the previous statement on the matter issued in 2013 was being misinterpreted to suggest that different legal rules should be applied to SEPs than are applied to other patents, limiting the remedies available when SEPs are infringed.

Patent – No interim injunction when patent already expired

Observing that Ticagrelor though covered under Markush structure of IN '229 is neither one of the 134 compounds nor 144 compounds disclosed in the claims of IN'229,

Delhi High Court has held that it cannot be said that Plaintiff's IN '907 did not result in any invention with enhanced efficacy. The Court in this regard also noted that the date of publishing of IN '229 was 4-2-1999 whereas the priority date of IN '907 was 4-12-1998. It held that hence the claim with its complete specification in IN '907 was submitted prior to the publishing date of IN '229 and cannot be held to be anticipated in terms of Section 13 of the Patents Act. Court also observed that plaintiff had claimed under IN '229 that the patent had not worked and it was only after BRILINTA was manufactured and tested under IN '907, it worked even under IN '229 for the reason that IN '907 is a species of genus/Markush formula IN '229. The High Court in the case of *Astrazeneca AB v. Emcure Pharmaceuticals Ltd.* though held that there was *prima facie* case in favor of plaintiff, it declined to grant interim injunction observing that plaintiff's patent IN'907 expired on 2-12-2019 and defendant's had already launched its product. It directed the defendant to maintain its accounts of sale from the date of launch of its product till 2-12-2019.

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