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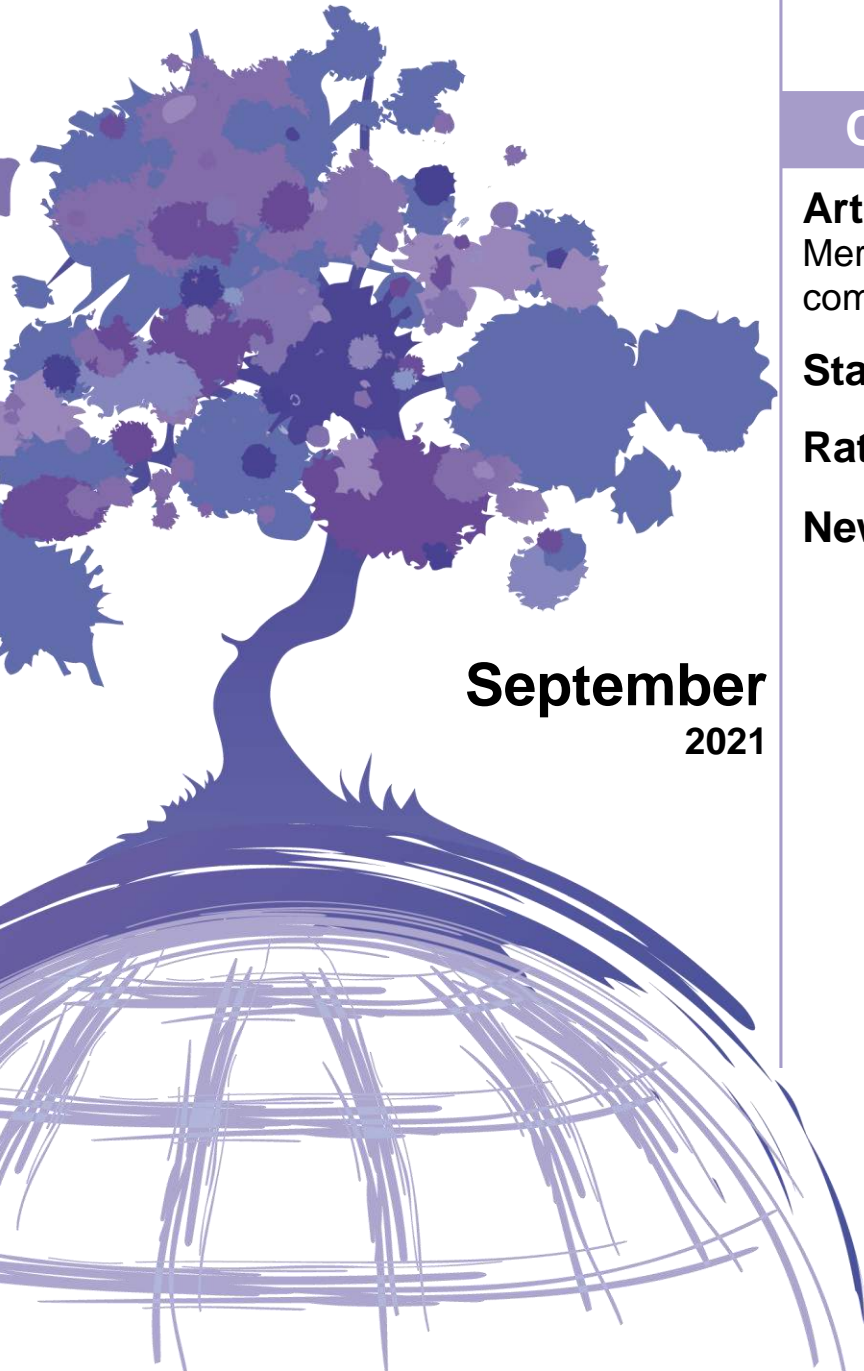
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Article

Meritorious win: Patentability of computer related inventions in India

By **Gaurav Gupta**

In the case of *Ferid Allani v. Union of India and Ors.*, the Intellectual Property Appellate Board ('IPAB') set aside the refusal order of the Indian Patent Office ('IPO') and allowed the appellant's patent application.

After juggling the matter between the Delhi High Court, the IPO, and the IPAB, primarily over the issue of patent eligibility of computer-related inventions under Section 3(k) of the Patents Act, the claimed invention was acknowledged as patentable in view of the 'technical effect' and the 'technical contribution' of said invention. The silver line is that the courts and tribunal in India are aligned to the jurisprudence developed in the US and the EU in granting patents to computer program enabled inventions. However, like in any other jurisdiction, some examiners or controllers may exercise narrow view of granting patents for such subject matter. A huge credit goes to the applicant for his conviction in the merits of the invention and his faith in the Indian judicial system. After many battles, including twice in the IPO, twice in the IPAB, and twice in the Delhi HC, the applicant finally won the war and got a well-deserved relief. The decision also confirms the view that Indian IP jurisprudence is still developing and that interference by the Courts is not avoidable in all circumstances.

The write-up below provides the facts of the case, the timeline, a summary of the second leg of proceedings at the Delhi HC, the IPO and the IPAB, and conclusions.

Facts of the case

The appellant, Ferid Allani, a citizen of Tunisia, filed the national phase patent application no. IN/PCT/2002/00705/DEL with the IPO. The application was titled '*Method and Device for Accessing Information Sources and Services on the Web*'. The IPO, after examining the application, issued a First Examination Report (FER) objecting the method claims for being directed to computer program *per se* under Section 3(k) of the Patents Act, 1970 and the device claims for lacking novelty and inventive step over the prior arts cited in the FER. The appellant responded to the FER along with claim amendments.

The IPO examined the appellant's response and the claim amendments and issued a refusal order stating the claimed invention was still not novel and inventive and was directed to computer program *per se* under Section 3(k). The IPO pronounced the refusal order within 4 days from the date of filing of the response to FER, without giving a due opportunity to the appellant, through an oral hearing, to address the outstanding objections.

Facts associated with the first leg of judicial proceedings:

The appellant filed a writ petition before the Delhi HC challenging the contentions raised in the IPO's refusal order and asking for an opportunity of hearing in accordance with the

principles of natural justice. The Delhi HC remanded the matter back to the IPO, directing the IPO to provide to the appellant an opportunity of hearing, in accordance with the provisions of the Patents Act before deciding the appellant's patent application.

Subsequently, the IPO issued a hearing notice and upon hearing the appellant rejected the patent application concluding that method claims 1 to 8 were directed to computer program *per se* and were thus non-patentable under Section 3(k) and device claims 9 to 14 lacked novelty and inventive step.

The appellant then filed an appeal at the IPAB, against the IPO's refusal order. However, the IPAB dismissed the appellant's appeal and affirmed the decision of the IPO of refusing the patent application for lacking novelty and inventive step and for lacking 'technical effect' and 'technical advancement'.

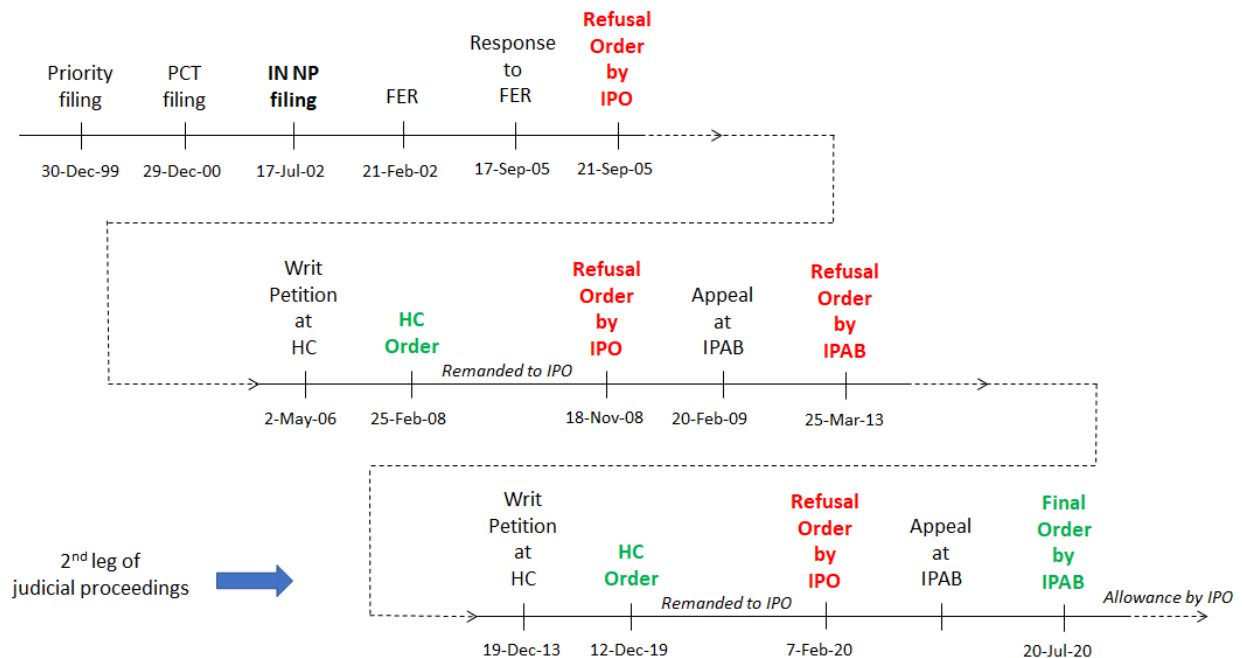
Facts associated with the second leg of judicial proceedings:

Aggrieved by the IPAB Order, the appellant filed a writ petition in Delhi HC. The Delhi HC disposed the petition and directed the IPO to re-examine the appellant's patent application.

In response to the directions of the Delhi HC, the IPO scheduled a hearing and reviewed the oral submission made during the hearing and the written submissions filed post hearing and again refused the patent application on the ground that the claimed invention lacks novelty and that the invention as claimed in claims is a computer program *per se*, as provided under Section 3(k).

The appellant again challenged the IPO's refusal order before the IPAB. Since the term of the patent was nearing its expiry (on 29 December 2020), the IPAB heard the appeal on urgent basis and pronounced the Order, directing the IPO to allow the appellant's patent application.

The timeline of the case is illustrated below.



Delhi High Court proceedings and the order dated 12 December 2019

The appellant, in the writ, stated that the specification discloses a technical effect (for overcoming Section 3(k)) and a technical advancement (for establishing inventive step over the cited arts). The appellant relied on the examples of ‘technical effect’ recited in *the Draft Guidelines for Examination of Computer Related Inventions, 2013* to assert that *an invention which would allow the user more efficient data base search strategies, more economical use of memory or higher speed, etc., would constitute ‘technical effect’ and thus the rejection of the patent is not in accordance with law.*

During the proceedings, the following was stated to reiterate the well settled legal position in respect of patent eligibility of computer-related inventions in India and abroad:

- The bar on patenting is in respect of ‘*computer programs per se....*’ and not all inventions based on computer programs.
- The words ‘*per se*’ were incorporated against the term ‘computer program’ in Section 3(k) so as to ensure that genuine inventions which are developed based on computer programs are not refused patents.
- The use of the word ‘*per se*’ in Section 3(k) suggests that the legal position in India is similar to that in the EU, as Article 52 of the European Patent Convention excludes computer program ‘*as such*’ from patentability.
- The ‘effect’ that computer programs produce, including in digital and electronic products, is crucial in determining the test of patentability.

- Patent applications for the computer-related inventions would have to be examined to see if they result in a ‘technical contribution’.
- If the invention demonstrates a ‘technical effect’ or a ‘technical contribution’, it is patentable even though it may be based on a computer program.

In light of the above, the HC remanded the matter back to the IPO and directed the IPO to re-examine the claims in accordance with the judicial precedents and settled practices of patent offices (across globe), including *the Guidelines for Examination of Computer Related Inventions, 2017.*

IPO proceedings and the refusal order dated 7 February 2020

The Controller, at the IPO, scheduled a hearing with the agent of the appellant for 27 January 2020. The Controller heard the agent of the appellant at length and pronounced a refusal order yet again on 7 February 2020.

In the refusal order, the Controller referred to plethora of the EU and the UK case law¹ and established that there is an inconsistency in the stands and tests for patentability of computer-related inventions across the UK and the EU (as indicated by *Symbian*). The Controller also quoted portions of *HTC Europe Co Ltd v. Apple*

¹ *Vicom (T0208/84)* of European Patent Office, Boards of Appeal; *AT&T Knowledge Ventures/Cvon Innovations v Comptroller General of Patents* [2009]; *IBM (T0006/83)* of European Patent Office, Boards of Appeal; *IBM (T0115/85)* of European Patent Office, Boards of Appeal; *Merrill Lynch's Application* [1989] R.P.C. 561; *In Re: Gale's Application* [1991] R.P.C. 305; *Hitachi*, Decision of Technical Board of Appeal 3.5.1, dated 21 April 2004; *Fujitsu Limited's Application* [1997] R.P.C. 608; *Duns Licensing (T0154/04)*, Boards Of Appeal of The European Patent Office, 15 November 2006; *Aerotel Ltd. v Telco Holdings Ltd & Ors*, In the Supreme Court of Judicature, Date:27 October 2006; *Symbian Ltd v. Comptroller-General Of Patents* [2009] R.P.C.; *HTC Europe Co. Ltd. v Apple Inc.*, Date: 3 May 2013; *Astron Clinica Ltd. v Comptroller-General* [2008] R.P.C.

Inc. that states ‘technical effect’ and ‘technical contribution’ appear to be synonymous and the ‘technical contribution’ test is a singularly unhelpful test for determine patent eligibility because the interaction between hardware and software in a computer is inherently ‘technical’ in the ordinary sense of the word.

The Controller went on to state that while the four-step test laid down in *Aerotel* is still relevant, each case must be determined by reference to its own facts and features (as stated in *Symbian*).

In his assessment, in respect of the novelty and inventive step issues, the Controller stated that the objective of the claimed invention is the same as that of the closest prior art D1 (EP0847019A1) and the claimed subject matter has no technical difference with respect to D1.

With respect to the assessment for computer program *per se* under Section 3(k), the Controller was quite bold to state: (a) D1 has a technical advancement over the claimed invention; and (b) the claimed invention negates the disadvantages associated with the general concept of searching on the web. He recited the following excerpts from *Aerotel*:

This approach – sometimes called the ‘contribution approach’ though the word ‘contribution’ is not always used in this debate with precisely the same meaning - requires one to ask: what has been added to what is old? If all that has been added is an excluded category (in that case a computer program) then the claim is to the excluded matter as such. Inherent in the approach is an inquiry as to what actually is old.

In our opinion, therefore, the court must approach the categories without bias in favour of or against exclusion. All that is clear is that there was a positive intention and policy to exclude the categories concerned from being regarded as patentable inventions. We must

simply try to make sense of them using the language of the Convention.

Based on the above excerpts, the Controller asserted that the technicality and structuring of queries for web-based search pertains the field of computer programming and therefore the question of technical contribution doesn’t arise, and no other approach could be taken for consideration in view of the legislative intent, behind European Patent Convention.

Reading the refusal order, it clearly appeared that the Controller had made up mind to refuse the patent application as he cherry picked the caselaws to provide his arguments. It is not at all surprising that once the decision to refuse a patent application is made earlier by a Controller at the IPO, the Controller will most likely provide reasons to substantiate his decision in case the application is remanded back to him by a high forum.

IPAB proceedings and the grant order dated 20 July 2020

The IPAB heard the counsel of the appellant and showed their surprise that the respondent did not counter or made an appearance during the proceedings before the IPAB.

The IPAB, in the order, stated that the Controller at the IPO erred in his assessment at multiple levels, namely:

- incorrect identification of D1 as relevant prior art, since D1 and the claimed invention have different objectives and provided different solutions.
- no appreciation of the technical effect (reduction in bandwidth usage and search mean-time duration) and the technical contribution (generation of more precise search query locally in the client device and delay the hit of the

sing search query to the web) of the claimed invention.

- incorrect stand that the EU guidelines shall supersede over the *Guidelines for Examination of Computer Related Inventions, 2013*.
- not referring to the Indian Guidelines for Examination of Computer Related Inventions that provide cogent and coherent guidance in terms of the indicators of ‘technical effect’.
- incorrect reliance of the judgment in *Aerotel* to conclude it as the definitive statement on the law on patentability of Computer Related Inventions, in the United Kingdom, since *Aerotel* was not centered around the concept of the term ‘technical contribution’.

The IPAB went on to state that the Controller, though had cited *Astron Clinica Ltd. v. Comptroller General, 2008, R.P.C.* in the refusal order, but failed to rely on its guidance on the aspect of ‘technical contribution’ that *in the case of a computer related invention which produces a substantive technical contribution, the application of step (ii) (of the four-step test of Aerotel) will identify that contribution and the application of step (iii) (of the four-step test of Aerotel) will lead*

to the answer that it does not fall wholly within the excluded matter.

In view of their finding, the IPAB concluded that the present invention had a significant technical contribution to the state of the art (i.e., the art before the priority date of the appellant’s patent application) and possessed a critical technical effect, and accordingly allowed the appellant’s patent application.

Conclusion

By setting aside the IPO’s refusal order, the IPAB quashed the notion of the IPO of not giving weightage to ‘technical effect’ and ‘technical contribution’ for the purpose of assessment of patentability of computer-related inventions. The IPAB promulgated that assessment of ‘technical effect’ produced by the invention is essential and just because a computer program is used for effectuating a part of the invention, it does not provide a bar to patentability. The IPAB also affirmed that the invention must be examined as whole and the ‘technical effect’ and the ‘technical contribution’ associated with the invention are the essential factors in deciding the patentability of computer-related inventions.

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Statute Update

Fees payable by educational institutions reduced – Patents Rules, 2003 amended

The Government of India has notified the Patents (Amendment) Rules, 2021 on 21 September 2021. Amending the Patent Rules, 2003 with

effect from 21 September 2021, the Department for Promotion of Industry and Internal Trade under the Ministry of Commerce and Industry has extended the benefit of reduction in official fees to educational institutions also.

There is now an **80% reduction in the official fees** payable by Educational Institution, which is same as that payable by a natural person, a start-up, or a small entity.

The newly introduced Rule 2(ca) provides the definition of 'Educational Institution' and recites as following:

'Educational institution means a university established or incorporated by or under Central Act, a Provincial Act, or a State Act, and includes any other educational institution as recognised by an authority designated by the Central Government or the State Government or the Union territories in this regard;'

For claiming the status of Educational Institution, the applicant will have to file Form-28 along with necessary supporting document(s) which establishes that it is an educational institution as

defined under of Rule 2(ca). Foreign educational institutions are also eligible for claiming the reduction in official fee, provided they are established, incorporated, or recognized as per the laws and provisions of their country. They too will have to file Form-28 along with necessary supporting document(s).

For already filed applications or granted Indian patents, the eligible applicant/patentee can file Form-28 along with necessary supporting document(s) and claim the status of educational institution. Once the Indian Patent Office (IPO) processes the request (Form-28) and changes the status of the applicant/patentee to Educational Institution, reduced official fee can be paid including the maintenance fee. Such request will need to be filed separately for each application/patent.



Ratio decidendi

- 1. Designs – High Court has jurisdiction to try counter-claim for cancellation of registration of plaintiff**
- 2. Designs – Publication on own website prior to registration fatal**

The Madhya Pradesh High Court has rejected the application for temporary injunction filed by the plaintiff in a case of alleged infringement of the plaintiff's design. The Court observed that the plaintiffs' own website had published the same designs, and there were documents to demonstrate adoption of same design by other

manufacturers in other part of the world prior to 1 November 2017, which was the date of registration of the plaintiffs' designs. Further, while observing that the matter was arguable and that the plaintiffs' claim of injunction could only be considered after the evidence was led by the parties, the High Court held that since the damages were claimed, the loss suffered was quantifiable with no irreparable loss or injury was likely to be caused. Defendant's objection that it was not the manufacturer of the goods in question, as it procured the same from another company (which was not included in the dispute), was also noted by the Court here.

The Court also rejected the plaintiff's contention that until and unless the designs are not cancelled by the Controller, the defendant cannot claim that the designs are not noble or original or that they have been disclosed to public prior to the filing date. It held that the registration of the design does not give any presumption that the design is not previously registered in India or that it is an original design, etc.

Deliberating upon provisions of Sections 22(2) to 22(5) of the Designs Act, 2000, the High Court held that it has the jurisdiction to try the counter claim filed by the defendant for cancellation of registration of design under the said Act in a suit filed by the plaintiff for injunction in respect of the disputed designs. It hence rejected the contention that an application for cancellation of design can only be submitted before the Controller and not before the High Court. The Court noted that the civil suit itself had travelled from the District Court to the High Court on an application filed by the defendant under Section 22(4) of the Design Act and was in fact the Supreme Court had taken note of the defence raised by the defendant while it thought it fit to transfer the civil suit to this Court. ***[For decision of the Supreme Court in respect of transfer to High Court not having Commercial Court Bench, please refer L&S IPR Amicus, December 2020 issue [here](#)]*** *[Mold Tek Packaging Limited v. S.D. Containers – Decision dated 1 September 2021 in Civil Suit No.01-2021, Madhya Pradesh High Court]*

Termination of trademark licences – Effect, when defendant a JV with 50% holding of plaintiff

In an interesting case of intersection of Corporate law with the IPR law, where the plaintiff alleged unauthorized use of trade mark in the corporate name of the first Defendant, which was a joint venture of the plaintiff itself and another

company, the Karnataka High Court has held that the Defendant was not entitled to continue the use of the Trade Mark in its corporate name from the date of execution of the Termination Agreement. The High Court in this regard observed that the entitlement of the first Defendant to use the letters 'AAF' as a mark and in its corporate name was based on the licence agreements and not on the clauses contained in the Articles of Association of the first Defendant company. It held that the Articles of Association could not override the terms of the Licence Agreements. Noting that pursuant to the termination agreement, the second Defendant ceased to be a permitted user of the trademarks of the second Plaintiff, it held that subsequent use of the mark by the second Defendant was infringement of trade mark of the second Plaintiff.

Contention of the defendant that they could not take any steps to delete the letters 'AAF' from its corporate name as it was for the shareholders (plaintiff) to take a decision about the change of its corporate name and the company cannot impose its own decision on the shareholders, was rejected by the High Court. The Court noted that the licence agreements and the termination agreement were not executed by the second Plaintiffs in its capacity as a shareholder of the first Defendant but, in favour of the first Defendant in its capacity as the proprietor and owner of the trade mark 'AAF'. The High Court for this purpose perused various clauses of the termination agreement and the Articles of Association while it upheld the Order passed by Additional City Civil and Sessions Judge. *[Kirloskar AAF Limited v. American Air Filters Company Inc. – Judgement dated 26 August 2021 in Regular First Appeal No. 1 of 2015, Karnataka High Court]*

Trademarks – Passing off by use of acronym ‘IIHM’ in respect of similar services

Distinguishing its earlier decision in the case of *Three-N- Products Private Ltd. v. Emami Ltd.*, the Calcutta High Court has confirmed its interim order passed in respect of relief against use of the acronym ‘IIHM’ without the full name of the defendant, i.e. Indian Institute of Hotel Management. The Court noted that the plaintiff was using the same acronym ‘IIHM’ for its institute – International Institute of Hotel Management, much prior in point of time than that of the defendants.

The Court noted that both the plaintiffs and the defendants were engaged in the similar type of business of running an educational institute and that the logo used by the defendant on the dress and bags of the students had striking semblance with that of the plaintiff’s logo. It also observed

that the existing domain name of the plaintiffs and the defendants were strikingly similar and hence stage, *prima facie*, it appeared that the defendants were using the domain name of the plaintiffs to pass off its products as that of the plaintiffs.

The High Court was also of the view that at the *prima facie* stage, it cannot be said conclusively that the plaintiffs had acquiesced in the use of the abbreviation ‘IIHM’ by the defendants to attract Section 33 of the Trade Marks Act, 1999. The Court noted that the parties were litigating amongst themselves for a considerable period as the plaintiffs had earlier filed another suit, four contempt petitions, and now the present suit. [*Salt Lake Society for Hotel Management v. Gazi Murshidul Arefin* – Judgement dated 3 September 2021 in I.A G.A. No. 1 of 2020 in CS No. 50 of 2020, Calcutta High Court]



News Nuggets

Champagne as a service – Protection to product PDO also available where the disputed sign designates a service

The Court of Justice of the European Union has held that Article 103(2)(b) of the EU Regulation No. 1308/2013 does not require that the product protected by a Protected Designation of Origin (‘PDO’) and the product or service covered by the disputed sign be identical or similar. Holding that protection to a PDO is also available where the disputed sign designates a service, the CJEU observed that

the reputation of a product covered by a PDO is liable to be exploited also where the practice referred to in that provision concerns a service. It also held that evocation is established where the use of a name creates, in the mind of an average European consumer who is reasonably well informed and reasonably observant and circumspect, a sufficiently clear and direct link between that name and the PDO. The dispute in the case *Comité Interprofessionnel du Vin de Champagne v. GB* [Judgement dated 9 September 2021] involved use of the sign ‘Champanillo’ (meaning ‘little champagne’ in

Spanish) with an image of two champagne coupes containing a sparkling beverage, by the defendant (a bar). The petitioner was of the view that use of the word 'Champanillo' infringed the PDO 'Champagne'.

Basmati GI tag – Over-inclusion of areas of various States while leaving out 13 districts of Madhya Pradesh – Supreme Court sets aside Madras HC decision

The Supreme Court of India has set aside the Madras High Court decision in a dispute on the question of over-inclusion of some areas in the Geographical Indication (GI) application filed for Basmati tag in respect of rice grown in specific States. The Madras High Court had permitted the petitioners to raise all grounds in the other writ petitions pending before it which pertained to the validity of the order passed by the Assistant Registrar rejecting the contention of the petitioners for inclusion of 13 districts in the State of Madhya Pradesh for the purposes of the Basmati GI. The Apex Court in its Order dated 2 September 2021 [*Madhya Kshetra Basmati Growers Association Samiti v. IPAB*] was of the view that the High Court committed an error in not adjudicating the issue relating to the over-inclusion of areas in the States forming part of the APEDA GI application. It noted that the petitioners cannot raise the dispute pertaining to over-inclusion of areas in the other States in those pending writ petitions. APEDA had claimed 5 States in their entirety, i.e., Delhi, Punjab, Haryana, Uttarakhand and Himachal Pradesh, and parts of two States, i.e., Uttar Pradesh and Jammu & Kashmir, as 'traditionally Basmati cultivating areas' in India but, as per the petitioner, failed to include 13 districts of the State of Madhya Pradesh in its GI application as Basmati growing area.

Exclusive copyright licence can be terminated by the original owner

The Bombay High Court has that an exclusive licence under Copyrights Act, if given on certain terms and conditions, which are breached, can be terminated by the owner. The Court in this regard noted that though Section 2(j) of the Copyright Act defines exclusive licence as the one which confers rights on the licensee to exclude all other persons, including the owner of the copyright, any right comprised in the copyrighted work and Section 54 speaks of civil remedies, and for the remedies owner of copyright will include an exclusive licensee, nothing has been shown to the Court from the provisions of the Copyright Act that an exclusive licence, if given on certain terms and conditions, which are breached, cannot be terminated by the owner. This Order dated 26 August 2021 was passed in the case *Sholay Media Entertainment Pvt. Ltd. v. Narendra Hirawat and Co.*

Trademark – Prior use of mark 'Natural'

The Bombay High Court has granted an ad-interim injunction restraining the Defendants from using the mark 'NATURAL', a registered mark of the Plaintiff. The Court in this regard observed that though the signage of the Defendant said, 'since 1992', the Plaintiff was a registered proprietor with use that could be traced back to 1984. The Plaintiff in the case *Siddhant Icecreams LLP v. Natural Ice Cream* was in the business of manufacturing, selling, and distributing ice cream and related products through ice cream parlours under the NATURAL family of marks, and the defendant was also using the mark for advertising his ice cream.

Confusion between 'KORSUVA' and 'AROSUVA' fatal

The General Court of the European Union has dismissed an appeal against the Fourth Board of Appeal of EUIPO which had held that there was likelihood of confusion between the marks 'KORSUVA' and 'AROSUVA'. The Court was of the view that the difference created by the differing first letters of the signs at issue was not enough to offset the visual similarity resulting from the presence in common of the other letters. It noted that out of the seven letters, six were common and last four were in

the same order in the two words. Similarly, the differences in the initial parts of the marks were not found enough to counteract the phonetic similarity of the signs at issue. The Court in the case *Cara Therapeutics Inc. v. EUIPO* [Judgement dated 8 September 2021] was hence of the view that the fact the relevant public consisted of people (physicians) with high level of attention, was not sufficient to exclude the possibility that public might believe that the goods came from the same undertaking.

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