

concerning copyright, intellectual property rights, defamation, and religious sentiment under the Bharatiya Nyaya Sanhita (BNS), The Copyright Act, 1957, and the Trademarks Act- 2017.

- **DETAILED FACTS AND EVIDENCE:**

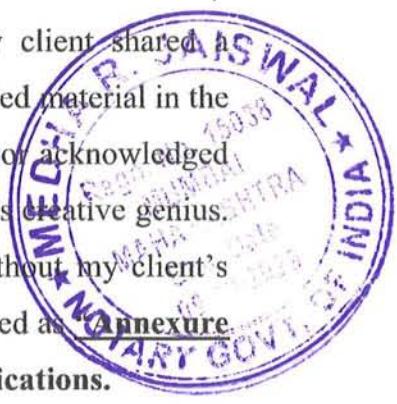
Ownership of Copyright and Intellectual Property: My client is the legitimate owner of the title and concept "TIMEGOD", as well as the script, poems, and various written and audio-visual materials associated with it. His work is registered with the Indian Copyright Office and the Screen Writers' Association, ensuring legal protection under the Indian Copyright Act, of 1957. These copyrights give my client exclusive rights to the reproduction, adaptation, and public performance of his work. Here is an annexure that is marked and annexed as "Annexure A" of the registration certificate.

- **Background:**

My client has worshiped TIMEGOD as part of his personal religious and philosophical practice since 1975. Over decades, he has produced an extensive body of work inspired by TIMEGOD, including poems, writings, songs, and scripts, all reflecting this deeply held belief. These works form a part of his intellectual property and spiritual identity. Misappropriating his work constitutes not only a legal infringement but a personal affront.

Unauthorized Use and Violation of Trust: In October 2023, my client shared a WhatsApp message with Mr. Atul Kapoor, which included copyrighted material in the form of poems and other works dedicated to TIMEGOD. Mr. Kapoor acknowledged these works, praised them, and expressed appreciation for my client's creative genius. There was no indication that this material would later be used without my client's knowledge or consent. Here is an annexure that is marked and annexed as "Annexure B", are the images of such exchange of the above-stated communications.

Subsequently, Bigg Boss (Season 18) incorporated TIMEGOD-related themes and content in a manner that was strikingly similar to my client's original work. This unauthorized use has caused significant emotional distress to my client, who considers



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TIMEGOD a sacred figure. The misrepresentation of his work in a public forum has deeply hurt my client and his followers, violating the ethical trust built over decades of professional association with Mr. Kapoor.

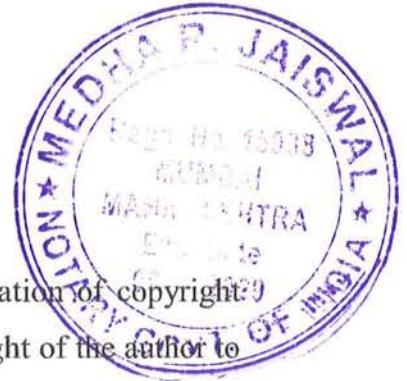
Misappropriation and Mockery of Religious Sentiments: The Bigg Boss (Season 18) show took significant elements from my client's concept, particularly themes related to TIME and GOD, without giving him proper credit or seeking his permission. Not only was his work used without authorization, but it was also subjected to mockery and ridicule on national television, causing him, his family, and his followers immense hurt and distress. This has offended not only my client but also his followers, who have long revered TIMEGOD as part of a religious practice.

Attempts to Seek Resolution: Despite repeated attempts to resolve the matter amicably through private communication with Mr. Atul Kapoor, my client's concerns were ignored. My client sought explanations, hoping for a reasonable resolution, but his efforts were met with silence. Such disregard has only intensified the emotional damage caused by the infringement.

- **DETAILED LEGAL CLAIMS:**

Copyright Infringement under the Indian Copyright Act, 1957:

The unauthorized use of my client's work constitutes a clear violation of copyright under Section 51 of the Indian Copyright Act, which protects the right of the author to control the reproduction and adaptation of their work. By incorporating key elements of the TIMEGOD concept into Bigg Boss (Season 18) without seeking permission, your production has unlawfully exploited my client's intellectual property. Further, under Section 57 (moral rights of authors), my client's rights to proper acknowledgment and integrity of his work have been violated. Mr. Sonee had shared copyrighted "TIMEGOD" material with Mr. Atul Kapoor, with no consent for public adaptation. The inclusion of this content in Bigg Boss (Season 18) has caused profound emotional distress and violation of trust. "TIMEGOD" holds deep religious significance for our



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client and his followers. The unauthorized use of this concept in a manner that mocks or diminishes its sanctity has led to irreparable emotional harm.

Legal Implication:

Copyright infringement carries both civil and criminal penalties under Indian law. My client is entitled to seek an injunction to prevent the continued airing of the infringing content and demand compensation for the unauthorized use of his work.

Intellectual Property Rights Violation under the Indian Trade Marks Act, 1999:

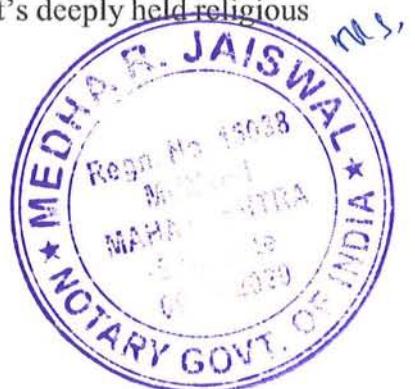
Section 29 of the Indian Trade Marks Act defines trademark infringement as any unauthorized use of a mark that is likely to cause confusion or deception. Your production has not only used my client's concept without authorization but has also gained commercial benefits by exploiting his creative work, which is protected by both trademark and copyright laws. Under Section 36A, this constitutes unfair trade practices, as the exploitation of my client's intellectual property has allowed you to profit from his original ideas without proper compensation.

Legal Implication:

Unfair trade practices and trademark violations entitle my client to compensation for the damage caused by your production's exploitation of his work.

- Defamation and Religious Sentiment Violation under the Bharatiya Nyaya Sanhita (BNS):

Sections 354 and 350 of the Bharatiya Nyaya Sanhita clearly prohibit acts that defame an individual or intentionally hurt religious sentiments. Your show's public mockery of the TIMEGOD concept has defamed my client, causing irreparable harm to his reputation. Moreover, the content of the show has hurt my client's deeply held religious beliefs, which has led to emotional and psychological distress.



Legal Implication:

Defamation under the BNS can result in both civil liability for damages and criminal prosecution. The deliberate misrepresentation of a religious belief system, as showcased in *Bigg Boss*, constitutes a severe breach of my client's rights.

Harassment and Mental Agony under the Bharatiya Nyaya Sanhita (BNS):

The continued use of my client's work without authorization and the subsequent mockery have caused undue harassment and mental agony to my client, as defined under Sections 354C and 506 of the Bharatiya Nyaya Sanhita. My client has endured severe emotional distress, exacerbated by the lack of response or acknowledgment from Mr. Kapoor and the production team.

Legal Implication:

Mental agony and harassment are recognized grounds for both civil and criminal actions under Indian law. My client is entitled to seek compensation for the emotional and psychological distress caused by your actions.

Unfair Trade Practices under Section 36A of the Indian Trade Marks Act:

By using my client's intellectual property to derive financial gain without his permission, your production has engaged in unfair trade practices. My client's TIMEGOD concept is a valuable asset, and the exploitation of this work without acknowledgment or compensation constitutes an unjust enrichment at my client's expense.

Legal Implication:

My client is entitled to compensation for the unlawful commercial benefits derived from the unauthorized use of his intellectual property.



- **EXPANDED DEMANDS:**

Immediate Cessation:

Cease and desist from the use of the TIMEGOD concept in Bigg Boss (Season 18) and in any future productions. This includes removing all existing content that features the TIMEGOD theme or any related concepts. Continued use of the content without my client's permission will be considered wilful copyright infringement, which carries significant legal consequences, including potential civil and criminal penalties.

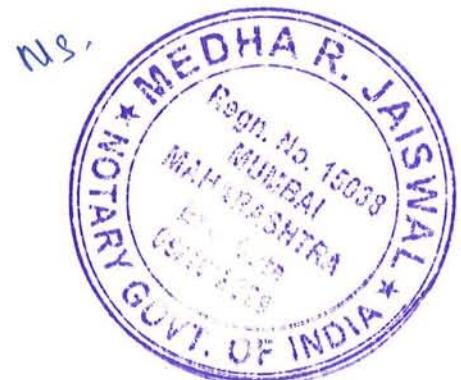
Public Apology:

Acknowledge your unauthorized use of the TIMEGOD concept in a public apology to be issued in prominent newspapers and media outlets, including The Times of India, Indian Express, and on all social media platforms associated with Bigg Boss. The apology must clearly state that the material used in the show was inspired by my client's work and that it was used without his permission. Failure to issue this public apology will be seen as an admission of guilt, further exacerbating the damage caused to my client.

Compensation of ₹100 Crores:

Pay my client ₹100 crores as compensation for the financial loss, emotional distress, and damage to his reputation caused by the unauthorized use of his work. This amount reflects the commercial gain earned by the show from the exploitation of my client's TIMEGOD concept and the extent of emotional suffering inflicted upon him.

Compensation Demand: A collective compensation of ₹100 crores, to be distributed among all involved entities, is demanded for the financial gain and emotional damage caused by the unauthorized use of "TIMEGOD."



Breakdown of Compensation:

1. Endemol Shine India: ₹20 crores
2. Banijay Asia: ₹10 crores
3. Viacom18: ₹15 crores
4. Colors TV: ₹12 crores
5. JioCinema: ₹10 crores
6. Tata Motors: ₹10 crores
7. L'Oréal Paris: ₹8 crores
8. CoinSwitch: ₹5 crores
9. Salman Khan: ₹12 crores
10. Atul Kapoor: ₹6 crores

Interest and Penalty: Compensation must be paid within 30 days of receipt of this notice.

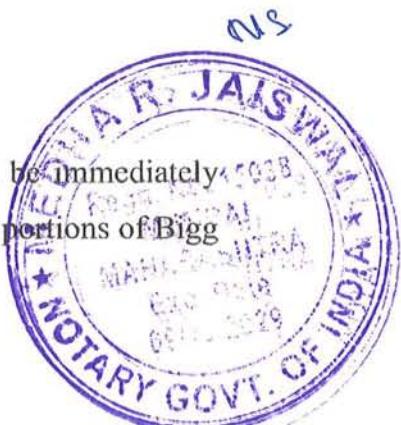
A 9% interest on delayed payments will apply.

Royalty Payment:

In addition to the compensation for damages, my client is entitled to a 10% royalty on all earnings generated by Bigg Boss (Season 18) and any future productions that use the TIMEGOD concept. This royalty applies to television broadcasts, online streaming, merchandise sales, and any other sources of revenue derived from the use of his intellectual property.

Removal of Offensive Content:

All content that mocks or disrespects the TIMEGOD concept must be immediately removed from public circulation. This includes removing the relevant portions of Bigg



Boss (Season 18) from all television, digital platforms, streaming services, and promotional materials. Failure to remove such content will constitute continued infringement and subject you to further legal action.

Credit to My Client:

My client must receive appropriate credit for his work in all current and future productions that feature the TIMEGOD concept. This includes full acknowledgment in the show's credits, promotional materials, and any media where the TIMEGOD theme is referenced. The failure to credit my client constitutes a violation of his moral rights under the Copyright Act.

Honor and Spiritual Display

Mantra Display: To respect the sacred nature of TIMEGOD, the following mantra must be displayed on the set: **“Oh Sarv Prabhu, Sarva Shaktiyamaan Waqt Aaye Namah.”** Contestants should also chant this mantra daily, either before or after the Bigg Boss anthem.

Scripture Display: Prominently display the following on the Bigg Boss set:

“TIMEGOD Creates & Destroys”

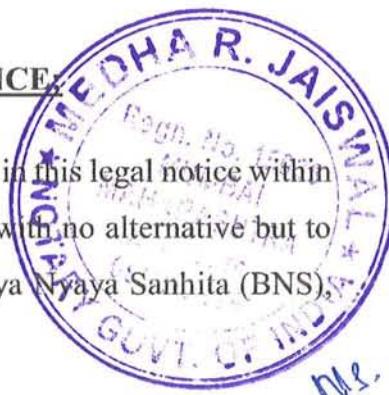
“The Power of the Universe, The Power That Controls It, Is the Power of TIME.”

“ओ सर्व प्रभु, सर्व शक्तिमान वक्त आये नमः”

Intellectual Attribution: The author, Mr. Naresh Sonee, should be credited in a visible, albeit modest, font beneath these displays.

• LEGAL CONSEQUENCES OF NON-COMPLIANCE

In the event that you fail to comply with the demands outlined in this legal notice within 7 days from the receipt of this notice, my client will be left with no alternative but to pursue strict legal action under the provisions of the Bharatiya Nyaya Sanhita (BNS),



Indian Copyright Act, 1957, and Indian Trade Marks Act, 1999. The following consequences will ensue:

1. Civil Litigation for Copyright Infringement and Compensation Claims:

a) Injunction and Cease and Desist Orders:

My client will immediately seek an injunction in the competent court to prevent the further broadcast, streaming, or display of the infringing content on all platforms. This includes Bigg Boss (Season 18) episodes and any future content where the TIMEGOD concept is used without authorization. The court will be asked to issue a temporary restraining order (TRO) or a permanent injunction depending on the extent of ongoing infringement.

The injunction will force the immediate suspension of the infringing episodes across television and online platforms, including JIO TV, Colors TV, and Viacom's online streaming services, pending further legal resolution.

b) Monetary Damages and Financial Compensation:

My client will seek financial compensation for the commercial exploitation of his intellectual property. The monetary damages will be calculated based on the profits accrued by Viacom 18 and all associated entities from the illegal use of the TIMEGOD concept, including all advertising revenue, sponsorships, licensing, merchandising, and any other earnings linked to the infringing content. In addition to the ₹20 crores in compensatory damages, my client will pursue punitive damages for the intentional misuse of his work and the emotional distress caused.

Courts may also impose statutory damages under the Indian Copyright Act, 1957, Section 55, which provides for compensation beyond actual damages in cases of deliberate infringement. These statutory damages can range from several lakhs to crores depending on the severity of the violation and its impact on my client's reputation and livelihood.



c) Royalties and Profit Share:

My client will demand a 10% royalty on all future earnings generated by the infringing content. If the show is rerun or made available for streaming post-litigation, a court-appointed auditor will be requested to audit the financial records of Viacom, Colors TV, and JIO TV to ensure that all revenues derived from the infringing episodes and merchandise include royalty payments to my client. Failure to comply with this will result in contempt of court charges.

2. Criminal Action for Defamation, Religious Sentiment Violation, and Harassment under the Bharatiya Nyaya Sanhita (BNS):

a) Filing of Criminal Complaints:

My client will initiate criminal proceedings under the relevant provisions of the Bharatiya Nyaya Sanhita (BNS), including Sections 354 and 350 for defamation and insult to religious sentiments. A First Information Report (FIR) will be filed with the police authorities for deliberate acts intended to outrage religious feelings through mockery of TIMEGOD, which is worshipped by my client and many of his followers.

b) Prosecution under BNS Sections 354 and 350:

Under BNS Section 354, criminal defamation penalties include imprisonment of up to two years, fines, or both. For insulting religious beliefs under BNS Section 350, there is a provision for imprisonment of up to three years, fines, or both. The criminal court may also require the accused parties, including Mr. Atul Kapoor, Mr. Salman Khan, and Viacom 18 representatives, to personally appear before the court during trial proceedings. Non-compliance with summonses or court orders could result in arrest warrants being issued against the accused.



c) Harassment and Mental Agony Prosecution:

Under BNS Section 354C and 506, my client will file complaints for harassment, resulting in the imposition of penalties and criminal charges for causing mental agony and emotional distress. These sections allow the court to issue restraining orders against any further contact or communication from the infringing parties and impose criminal penalties for the willful neglect of the emotional harm caused to my client.

d) Personal Liability of the Defendants:

Beyond corporate liability, individuals like Mr. Atul Kapoor and Mr. Salman Khan will be personally held accountable for their involvement in the infringement and misuse of the TIMEGOD concept. They may face criminal prosecution, where they would be required to defend their actions in court. This personal liability includes any direct or indirect actions that contributed to the harm caused to my client.

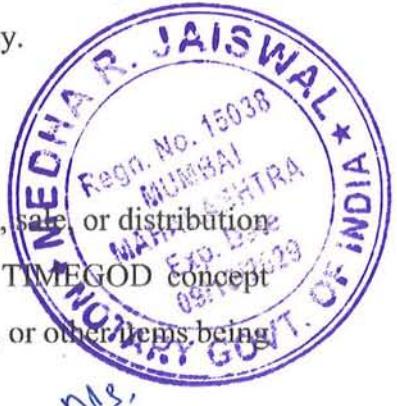
3. Legal Actions for Unfair Trade Practices under the Indian Trade Marks Act, 1999:

a) Unfair Trade Practice Litigation:

Under Section 36A of the Indian Trade Marks Act, 1999, my client will file a legal suit for unfair trade practices, claiming that your company and its affiliates unfairly benefitted from the unauthorized use of the TIMEGOD concept. Courts may order you to disgorge any profits made from this exploitation and compensate my client for damages caused due to the unethical use of his intellectual property.

b) Cancellation of Copyright-Related Merchandise:

In addition, my client will seek a court order to halt the production, sale, or distribution of any merchandise or promotional material that leverages the TIMEGOD concept without proper permission. This includes branded goods, products, or other items being



sold under the guise of Bigg Boss themes that involve my client's intellectual property. Any proceeds made through such sales must be returned to my client as unjust enrichment.

4. Legal and Regulatory Complaints:

a) Complaints with Regulatory Bodies:

My client will also approach the Indian Broadcasting Foundation (IBF), the National Human Rights Commission (NHRC), and the Ministry of Information and Broadcasting to file formal complaints against Viacom 18 and its affiliates. These complaints will focus on the unauthorized broadcast of copyrighted material, violations of broadcasting standards, and exploitation of personal religious beliefs for commercial gain. An investigation by these authorities could lead to penalties, suspension of broadcasting licenses, and other regulatory actions against your production company.

b) Public Shaming and Reputation Damage:

Failure to respond to this notice and rectify the violations will lead to a public legal battle, resulting in extensive media coverage and reputational damage for Viacom 18, Mr. Atul Kapoor, Mr. Salman Khan, and other concerned parties. My client will ensure that the legal action is highly publicized to highlight the injustice and exploitation he has suffered.

IMMEDIATE ACTION REQUIRED:

Failure to comply with the demands within 7 days from receipt of this legal notice will result in the initiation of the above-mentioned legal, civil, and criminal proceedings. This notice is issued without prejudice to any other rights or remedies available to my client under the law.

Our Client calls upon you to immediately act upon the requisitions stated above and compensate our Client for the loss suffered by them. Furthermore, our client states that the contents of this legal notice are without prejudice to the rights and remedies



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available to our client under Civil, Criminal, or any applicable law in force, and our client reserves its right to approach the appropriate legal forum to take necessary action against you and any party/parties that our client deems to be associated with your negligent acts, in any manner whatsoever.

We look forward to hearing from you within seven (07) days hereof that you shall comply with all of the requisitions set herein above. We hope to have your co-operation and an amicable settlement. Further, our client reserves his right to initiate suitable legal action against you as they are best advised, without any further notice to you whatsoever.

Should you wish to discuss this matter, please feel free to contact me at the email mentioned: - legal@vsipr.com

Yours Sincerely,



Adv. Amrita Dubey,
Advocate for the Client,
VS IPR AND LEGAL ADVISORS

C.C-

1. Mr. Atul Kapoor (Content Creator Voice Over)*

1401 Om Sai Charan, Link Road,
Yogi Nagar, BORIVALI (W),
Mumbai-400091



Tuncel M N.S.

2. Mr. Salman Khan (Actor Host) *

Salman Khan, SKF (Salman Khan Films),
 3rd Floor, White House, Plot No. 15,
 Andheri (West), Mumbai, Maharashtra 400053, India.

3. Colours Tv (Broadcast Partner) *

Colors TV (Viacom18 Media Pvt. Ltd.),
 CNN-IBN Building, 1st Floor, Plot No. 30,
 Sector 15, CBD Belapur, Navi Mumbai,
 Maharashtra 400614, India.

4. Jio Cinema (Streaming Partner) *

JioCinema (Reliance Jio Infocomm Ltd.),
 Reliance Corporate Park, Gate House,
 1st Floor, Bhakti Park, Wadala,
 Mumbai, Maharashtra 400037, India.

5. Endemol Shine India (Bigg Boss (Season 18) Production Team) (Producer)*

Endemol Shine India Pvt. Ltd.,
 401-404, 4th Floor, Crescent Tower,
 Saki Vihar Road, Andheri East,
 Mumbai, Maharashtra 400072, India.

6. Banijay Asia (Co-Producer) *

Banijay Asia Pvt. Ltd., 302-304,
 3rd Floor, Swati Tower, Opp. Clarion Hotel,
 Plot No. 17, DLF Phase II, Gurugram,
 Haryana 122002, India

7. Tata Motors (Title Sponsor) *

Tata Motors Ltd., Tata Centre,
 43 Jawaharlal Nehru Road, Kolkata,



West Bengal 700071, India.

8. L'Oréal Paris (Powered by Sponsor) *

L'Oréal India Pvt. Ltd., Plot No. A-1,
Survey No. 32/1, TTC Industrial Area,
Kharghar, Navi Mumbai,
Maharashtra 410210, India

9. CoinSwitch (Special Partner) *

CoinSwitch (Cryptocurrency Exchange), #34,
2nd Floor, 7th Main Road,
BTM Layout 2nd Stage, Bengaluru,
Karnataka 560076, India.

10. Viacom18 (Network)*

Viacom18 Media Pvt. Ltd., CNN-IBN Building,
1st Floor, Plot No. 30, Sector 15, CBD Belapur,
Navi Mumbai, Maharashtra 400614, India



[BY EMAIL/ COURIER/RPAD]

05th November 2024

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VS IPR AND LEGAL ADVISORS,
Adv. Vipul Bhatt/Adv. Amrita Dubey,
B-005, Surya Kiran Building,
Near St. Mary High School,
Awdhoot Nagar, Dahisar East,
Mumbai 400068

Email: legal@vsipr.com; amrita.vsipr@gmail.com; timegodofuniverse@gmail.com

Ref: - Your Notice dated 23rd October 2024 regarding alleged infringement of Mr. Naresh Sonee's concept of "TIMEGOD" ("Notice")

Sub: - Reply to allegations regarding "TIMEGOD" concept and related claims in Bigg Boss Hindi Season 18

Dear Sir/ Madam,

We, Viacom18 Media Private Limited ("Viacom18/We/V18/Our/Us"), a company registered under the Indian Companies Act, 1956, having Our registered office at 31st Floor, Tower A, One Unity Centre, Senapati Bapat Marg, Prabhadevi, Mumbai – 400013, write to You as under:

1. We are one of India's leading and fastest growing entertainment networks and a house of iconic brands that offers multi-platform, multi-generational entertainment and multi-cultural brand experiences. We own and operate several general entertainment, regional entertainment, music, youth and kids' channels, including channels named Nick, Sonic, Colors, MTV, VH1, and Comedy Central which are aired in more than 130 countries that reach out to 150 million viewers every day across all age groups. We operate Our film business through Our division 'Viacom18 Studios', and also own and operate the digital platform 'Jio Cinema'. We are a reputed production house and film studio, involved in the business of production, acquisition, co-production, promotion, marketing and distribution of various cinematographic films and audio-visual content in various Indian Languages, in multiple formats worldwide including but not limited to theatrical, television syndication, digital and internet connected platforms.

Viacom 18 Media Private Limited

31st Floor, Tower-4, One Unity Center, Senapati Bapat Marg, Prabhadevi, Mumbai - 400 013, Maharashtra, India
1 022 6265 4040 | www.viacom18.com | CIN: U92100MH1995PTC095508



We have produced critically acclaimed films such as *Bhaag Milkha Bhaag*, *Padmaavat*, *Andhadhun*, *Fighter* etc. to Our credit.

2. We acknowledge receipt of Your Notice dated 23rd October 2024 on behalf of Your Client Naresh Sonee for the alleged unauthorized use, distortion, and mockery of his intellectual property in the work titled 'TIMEGOD' / 'Time God Worship Universe' by purported unauthorized use thereof in Our television show Bigg Boss -Season 18.
3. At the Outset, We deny any and all allegations averred in Your Legal Notice and states that nothing contained therein shall be deemed to have been admitted for the reason of non-traverse. We note from Your Notice that all the allegations/averments therein pertain to the purported unauthorized use of Your Client's work in the content of the reality show 'Bigg Boss-Season 18' (hereinafter to be referred as 'said Program') aired on Colors channel and streaming on Jio Cinema. We deny Your allegations regarding infringement of copyright and concept of "TIMEGOD" by purportedly using it in the Program Bigg Boss Season 18 without authorization.
4. Bigg Boss is a reality TV show franchise based on the Dutch reality show 'Big Brother' owned by Endemol Shine IP B.V.. The Dutch reality show is based on the concept that several contestants known as *housemates* live in a purpose-built house known as the 'Big Boss House' and are isolated from the rest of the world. In the final week, there are three/four/five housemates remaining, and the public vote for whom they wanted to win. During their stay in the house, the contestants are continuously monitored by live television cameras as well as personal audio microphones. The contestants are required to indulge in housework and are assigned tasks by the omnipresent authority figure known to them as Bigg Boss whose only presence in the house is through his voice. The tasks are designed to test the teamwork abilities and community spirit of the housemates. The show is created in such a manner that the housemates are living together and carrying on their day-to-day activities, engaging in conversations with each other without any script. The said show is meant to have the housemates in a natural environment without any prompts, directions, suggestions or interference from the production house or the broadcaster or any other person.

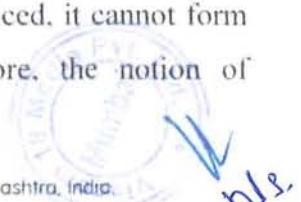
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5. The Bigg Boss show tends to introduce new theme each year so as to offer a diverse and entertaining experience for the contestants as well as the viewers of the show. In the present season of Bigg Boss i.e. Bigg Boss Season 18, the theme of the Program is 'Time ka Taandav', which explores the interconnection of the past, present, and future. The Program focuses on revealing the contestant's futures and the race against time, with each choice impacting their past, present, and future. The concept and theme work in a manner whereby, one contestant will be designated as "Time God" and granted the authority to oversee the rules and duties within the Bigg Boss house. Additionally, the "Time God" will have the ability, at certain times, to revisit past decisions and either amend them or make inquiries regarding future outcomes. The role of "Time God" is comparable to that of the weekly captain of the house, carrying a specific set of powers and responsibilities.
6. We state that any reference to the copyright registration of Your Client's alleged work titled 'TIMEGOD' is misplaced and irrelevant to Bigg Boss Season 18. The show- Bigg Boss, its themes, and portrayal of activities relating to time by the participants bear no resemblance to, nor derive inspiration from, Your Client's alleged work titled TIMEGOD. At no point does Bigg Boss Season 18 use, reference, or copy any part of Your Client's alleged copyright work. Thus, claims of copyright infringement have no legal basis, as the content and title of Bigg Boss Season 18 are original and distinct from Your Client's alleged work.
7. We would like to inform You that the notion of "time" as a divine or revered entity is deeply rooted in global religions, philosophies, and cultural practices. Worshipping time, acknowledging it as a powerful force, and depicting it symbolically as "god-like" are concepts that are neither novel nor proprietary to Your Client's alleged work. From Hindu deities like Mahakala to Greek mythology's Chronos, the reverence of time is an established theme across civilizations. Time worship as a concept is thus commonplace and universal, deeply integrated into cultural and spiritual traditions. The portrayal of time in Bigg Boss Season 18 draws from this universally recognized theme and does not appropriate or infringe upon any individual's unique ideology.
8. Since the worship of time is widely acknowledged and universally practiced, it cannot form the basis for copyright infringement or proprietary claims. Therefore, the notion of

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"TIMEGOD" as presented in Bigg Boss Season 18 is generic and in alignment with broad cultural understandings, making claims of ownership or exclusivity legally unsustainable.

9. We categorically state that the content used in Bigg Boss Season 18 is original and independently developed. There is no overlap with, misrepresentation of, or derogatory reference to Your Client's work or ideology. We are not aware of any WhatsApp communication purportedly shared by Your Client with Mr. Atul Kapoor. We would like to inform You that Mr. Atul Kapoor is only a voice over artist in the Program and is performing his role in terms of the agreement/ arrangement executed between him and Endemol Shine IP B.V. He is neither creatively involved in the Program nor has he shared any creative input in the Program with respect to "TIMEGOD" or otherwise. The material and creative concepts used in Bigg Boss Season 18 are the product of original work and have no relationship with the work of Your Client.
 10. The portrayal of time as an influential or divine force is a concept deeply rooted in universal human experience, acknowledged across a wide spectrum of cultures, religions, and philosophies. Viacom18 asserts that the references to time in Bigg Boss Season 18 are based on this universally accepted notion and have no unique or proprietary association with Mr. Sonee's concept of "TIMEGOD". Time, as depicted in the show, represents a collective understanding rather than any specific ideology. The idea of time as an omnipotent force, often revered or deified, is central to the philosophical thought of ancient civilizations, underscoring its foundational role in human culture, illustrative list of which, is provided hereunder:

Hindu Philosophy and Indian Cosmology: In Hinduism, Kala (time) is a revered entity, seen as cyclical and as a determining force that transcends human control. Hindu scriptures depict Lord Shiva as Mahakala (the Great Time), a god who embodies destruction. The Bhagavad Gita famously reinforces this, with Lord Krishna stating, "I am Time, the great destroyer of the world" (Chapter 11, Verse 32), reinforcing the idea of time as an overarching divine force. This has remained a constant theme in Indian philosophy, underscoring time's inevitability and its impact on human life.

- Buddhist Teachings: In Buddhism, time is integral to the process of reincarnation and the cyclical nature of life, death, and rebirth. Time, or samsara, is seen as a boundless cycle

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until one achieves liberation. This understanding represents time as a force that governs existence beyond any single individual's control.

- Greek Philosophy and Mythology: Chronos, the Greek god of time, was one of the earliest embodiments of time as an inevitable, all-encompassing force. Represented as a powerful, primordial being, Chronos personified time's continuous flow, affecting everything within creation. This concept shaped early Western philosophy and set a precedent for understanding time as a governing force of existence.
- Egyptian Mythology: In ancient Egypt, deities like Osiris symbolized cycles of time and renewal, where time was perceived as having divine qualities. These mythologies centered around time's unyielding power, mirroring the ancient reverence for time.
- Western Literature: Literature has often explored time as an influential force affecting human lives. For instance, T.S. Eliot's Four Quartets reflects on the philosophical and spiritual aspects of time, while Marcel Proust's "In Search of Lost Time" delves into the impact of time on memory and experience. The treatment of time in these literary works demonstrates its longstanding role as an essential theme in art, reflecting universal human truths.
- Modern Fiction and Cinema: Contemporary storytelling often presents time as a potent godlike entity, evident in works on time travel, fate, and existential reflection. Time's depiction as a dominant force is an established narrative tool, frequently used to convey life's transience and the inevitability of change.
- Cultural Reverence for Time: Beyond a Proprietary Concept the portrayal of time as a revered, controlling force transcends any single religious or cultural framework. Reverence for time reflects its inextricable role in human life rather than any unique ideology. This respect has been incorporated into religious, spiritual, and philosophical traditions for centuries, showcasing time as an entity that cannot be possessed or monopolized.

The above is merely an illustrative list with references to time as a powerful or a divine force. This concept while deeply rooted and acknowledged across various cultures, religions, and philosophies, the concept has also been portrayed in various films, series and other content.

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11. Bigg Boss Season 18, in its portrayal of time, draws from this universal understanding. The Program's thematic treatment of time as a significant force is part of the broader cultural and philosophical landscape and is not derived from Mr. Sonee's claimed concept.
12. Even otherwise, under the Indian Copyright Act, 1957, copyright protection does not extend to ideas, concepts, themes, or general principles; the protection applies only to the original expression of ideas in a tangible form, not to the underlying concepts or ideas themselves. In other words, the Act differentiates between the idea or concept of a work, and the unique way it is expressed, and it is only the expression of work which is protected. The dichotomy of idea versus expression has been well settled through statute and jurisprudence. The courts have upheld this interpretation, emphasizing that copyright protects the originality of expression but not the idea behind it. In **RG Anand v. Deluxe Films & Ors** [(1978) 4 SCC 118], the Supreme Court of India laid down a clear distinction between ideas and their expression. The Court held that while the theme or concept of a work is available for public use, the specific expression or "dramatic representation" of that theme is copyrightable. It stated, "If the defendant's work, when seen in its entirety, appears to be a copy of the original work, then only it would amount to infringement. But if the defendant's work has captured only the theme, it would not constitute copyright infringement." Similarly, in **Eastern Book Company v. D.B. Modak** [(2008) 1 SCC 1], the Supreme Court addressed copyright issues related to judgments published in law reports. The Court emphasized that copyright could only protect the skill, labor and arrangement in the presentation of judgments but not the core content (i.e., the judgments themselves), as they were merely ideas and are concepts available in the public domain as well. These judgments emphasize that while creators are entitled to protection over their original works, others are free to use the underlying concepts or themes, provided they do not copy the unique expression of those ideas.

We state that the portrayal of time in Bigg Boss Season 18 was created with respect for diverse beliefs and is designed to resonate with universally shared concepts, free of any offensive or derogatory connotations. The content in Bigg Boss Season 18 carefully adheres to industry standards and respects the wide-ranging sentiments of its viewers, ensuring it remains inclusive and non-offensive. No specific religious deity or unique ideology is referenced or represented.

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in the show's portrayal of time. The mere reference to time's power or supremacy aligns with widely accepted beliefs across various cultures and religions and does not in any way infringe upon Mr. Sonee's "TIMEGOD" concept, nor does it attempt to claim exclusivity over time as a symbolic theme.

14. The portrayal of time as a divine or revered entity is deeply embedded in history, philosophy, and mythology across diverse cultures. This makes Mr. Sonee's claims unfounded, as there exists no novelty or originality in the concept of "TIMEGOD" and as highlighted above, there is no copyright in an idea or concept. Time as an omnipotent force is an age-old, universally recognized theme that cannot be appropriated or monopolized by any single individual. Therefore, Viacom18 denies any infringement or alleged unauthorized use of Mr. Sonee's "TIMEGOD" concept and reaffirms that Bigg Boss Season 18 and its theme was developed independently, with adherence to established intellectual property guidelines and respect for cultural sentiments. The portrayal of time within the show aligns with commonly held beliefs, with creative liberty converting concepts into expressions and not offensive to religious or personal sentiments. There is no intent to hurt religious sentiments of any individual or group.
15. Your client's claims of trademark infringement under Section 29 of the Trademark Act are baseless and misapplied. Your Client has not furnished details of any registered trademark for "TIMEGOD" as claimed by Your Client which has been infringed in the Program, and hence, Section 29 cannot be invoked. Additionally, there has been no representation of any mark, nor any use in a commercial manner that could amount to infringement. The portrayal of time in Bigg Boss Season 18 does not bear any resemblance or association with any particular trademark or brand. As such, any claim under trademark law is unsupported by the facts and law.
16. Your Client's allegations of defamation and causing mental agony lack substantiation as the necessary elements of defamation under Indian law are wholly absent. Further, no statement or portrayal in Bigg Boss Season 18 defames Your Client, as there is no reference, direct or indirect, to any individual or entity. The show's content does not aim to harm any person's reputation, nor does it carry any false or disparaging implications.



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In view of the above, We call upon Your Client to withdraw the Notice with immediate effect. Your Client is also advised to cease and desist from making such baseless and frivolous allegations. Needless to state that should Your Client still initiate any legal action against Us, the same shall be defended by Us solely at Your Client's risk, as to costs and consequences. The present reply is issued without prejudice to rights and remedies as available to Us in law and in equity. We specifically retain the right to issue a detailed para-wise reply to Your Notice should the need arise.

Yours sincerely,

For Viacom18 Media Private Limited



Authorized Signatory

True copy
N.S



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VS IPR & LEGAL ADVISORS**Contact No: 9372000165|8898979393|8652519622****Email id: legal@vsipr.com | process@vsipr.com****LEGAL NOTICE****REGD.A. D/EMAIL****Without Prejudice**

Ref.No.-A.D.36

DATE-06/11/2024

FROM,
 VS IPR AND LEGAL ADVISORS LLP,
 ADV. VIPUL BHATT/ADV. AMRITA DUBEY,
 B-005, SURYA KIRAN BUILDING,
 NEAR ST. MARY HIGH SCHOOL,
 AWDHOOT NAGAR, DAHISAR EAST,
 MUMBAI-400068.

To,
 VIACOM 18 MEDIA PRIVATE LIMITED,
 31 FLOOR, TOWER-4, ONE UNITY CENTER,
 SENAPATI BAPAT MARG, PRABHADAEVI,
 MUMBAI - 400 013,

Subject: Rejoinder to Your Reply dated 23.10.2024 regarding the alleged infringement of our client, Mr. Naresh Sonee's concept of "TIMEGOD" in Bigg Boss Hindi Season 18.



True copy
MS

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VS IPR & LEGAL ADVISORS

Contact No: 9372000165|8898979393|8652519622

Email id: legal@vsipr.com | process@vsipr.com

Dear Sir/Madam,

On behalf of our client, Mr. Naresh Sonee, we submit this detailed rejoinder in response to your letter dated 05.11.2024 regarding the unauthorized use of Mr. Sonee's intellectual property, specifically his original "TIMEGOD" concept. This rejoinder is articulated in seven points, each meticulously elaborating on Mr. Sonee's ownership, originality, and the immediate legal actions requested.

1. Original Creation and Registration of "TIMEGOD"

Our client, Mr. Naresh Sonee, conceived and published the concept of "TIMEGOD" over 34 years ago. This foundational work appeared on a 1992-93 paperback calendar titled "Worship TIMEGOD." The calendar's contents, meticulously designed and published by Mr. Sonee, represent an original, pioneering work, making him the first to express the concept of "TIMEGOD" in any documented form. In the decades since "TIMEGOD" has not only been central to Mr. Sonee's spiritual and philosophical explorations but has also become a recognized title associated exclusively with his work.

To authenticate this creation, the physical calendar from 1992-93 can be submitted for forensic analysis to substantiate the publication's age. Additionally, recognizing the value and potential reach of his work, Mr. Sonee took strategic measures to protect "TIMEGOD" through formal registrations.

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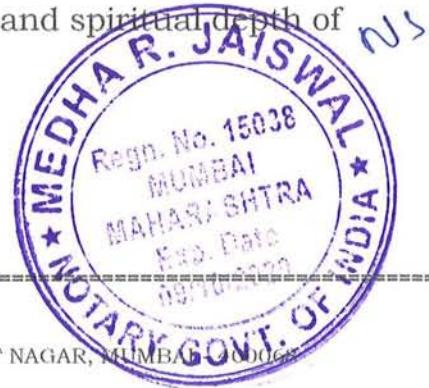
- **Government of India Registration (2019):** On 5.10.2019, the "TIMEGOD" title and associated literary content were registered with the Government of India, securing its legal recognition under Registration No. L-87533/2019. This registration formally acknowledges Mr. Sonee's creation, solidifying his ownership of "TIMEGOD" and establishing a legally documented history of his intellectual property rights.
- **Screen Writers Association (SWA) Registration (2019):** To provide additional protection and industry recognition, Mr. Sonee registered the "TIMEGOD" concept with the Screen Writers Association (SWA) on 16.10.2019. This dual layer of registration reflects his commitment to securing both his creative and commercial rights, which copyright law firmly supports.

In addition to these formal registrations, Mr. Sonee's work on "TIMEGOD" has reached the public through multiple media platforms, each substantiating his long-term association with the title.

- **Publication in *The Times of India* - Speaking Tree:** On 08.09.2012, an article authored by Mr. Sonee on the "TIMEGOD" concept was published in *The Times of India*'s Speaking Tree, bringing his work to a wider audience. This article, widely read and distributed, provided readers with early insights into the philosophical and spiritual depth of "TIMEGOD."

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- **Blog Post on 11.07.2008:** Mr. Sonee also published a blog entry titled "TIMEGOD" on 11.07.2008, which remains accessible and indexed on Google, serving as an enduring record of his original authorship.
- **YouTube Channel Launch and Videos:** Mr. Sonee established a YouTube channel titled "WORSHIP UNIVERSE" and uploaded a video titled "Know the Unknown - TIMEGOD" on 3.10.2019, predating any references or uses of the concept in Bigg Boss Season 18. This channel allowed Mr. Sonee to present his work in an accessible, digital format, reaching audiences drawn to spirituality and philosophy.

Collectively, these records firmly establish Mr. Sonee's unique and uninterrupted association with "TIMEGOD." His use of multiple mediums over several decades demonstrates his proactive efforts to safeguard his intellectual property and underscores his deep commitment to maintaining the integrity and originality of "TIMEGOD."

2. Definition and Distinctiveness of "TIMEGOD"

"TIMEGOD" as defined by Mr. Sonee is not a generic or colloquial term. Rather, it is a highly specific and original concept representing a unique spiritual philosophy that Mr. Sonee has dedicated his life to developing. "TIMEGOD" is positioned as the Supreme, Omnipotent entity, distinct from mythological deities or prophets, embodying Mr. Sonee's vision of time as an ultimate, all-encompassing force. It reflects his philosophical stance that time surpasses any traditional deity or religious figure.

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At the age of 17, Mr. Sonee penned a Hindi poem titled "Waqt Khuda sey Bada hai" (translated as "Time is Greater than God"), an expression that underpins his core philosophy. This poem was later published on his blog on 31.01.2012, and further emphasized through YouTube videos, with notable dates of 14.12.2020 and 27.07.2024. His poetry reflects a profound belief in the supremacy of time—a theme central to the "TIMEGOD" concept. Through this title, he addresses the transcendental nature of time as an entity that exists beyond any singular, cultural, or religious interpretation.

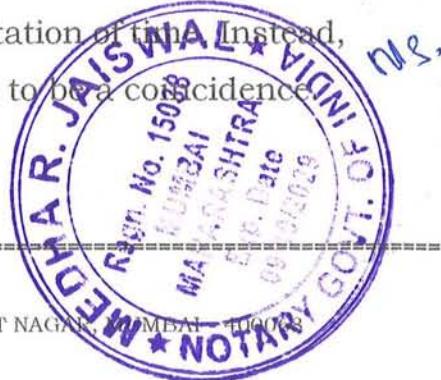
In creating the term "TIMEGOD," Mr. Sonee has set forth a unique philosophy, unprecedented in recorded history. Copyright law provides specific protections to such distinctive titles and original expressions, ensuring that creators retain control over the reproduction and distribution of their works. Because the term "TIMEGOD" and its associated philosophy were authored and first popularized by Mr. Sonee, his proprietary rights over this title remain exclusive.

3. Concerns Over Bigg Boss's "Time Ka Taandav" Theme

The theme of "Time Ka Taandav" in Bigg Boss Season 18—portraying time as an almost divine, all-encompassing force—presents an unmistakable similarity to Mr. Sonee's "TIMEGOD" concept. While Bigg Boss operates under the format of the Dutch show "Big Brother," the adaptation of a "Time God" character in this season goes beyond a general interpretation of time. Instead, it reflects a unique thematic overlap that is too specific to be a coincidence.

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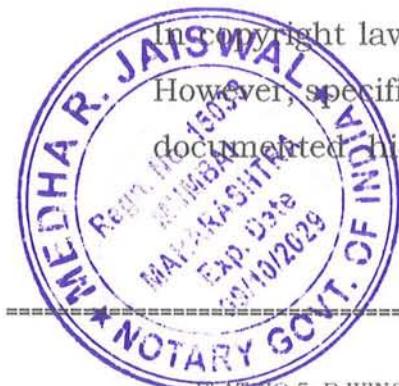
Email id: legal@vsipr.com | process@vsipr.com

Bigg Boss's adaptation of "Time Ka Taandav" relies on "time" as a dominant and almost supernatural theme that mirrors the core of Mr. Sonee's original concept. Viacom18's response that "time" is a universally recognized concept does not diminish the unique association and originality of Mr. Sonee's creation. Copyright law acknowledges the rights of authors to safeguard specific titles and themes against unauthorized exploitation, especially when these themes have a documented history and original creator.

Further implicating the show is Mr. Atul Kapoor's role. While he is presented as a voice-over artist, his influence on the contestants and knowledge of the "TIMEGOD" concept since October 2023 raises questions about Viacom18's awareness and intention in using a similar theme. Mr. Kapoor's contributions extend beyond basic narration; his involvement appears to influence the show's narrative direction and thematic choices, suggesting a deeper familiarity with the "TIMEGOD" concept.

Given these observations, Mr. Sonee requests Viacom18 to disclose the names and roles of the scriptwriter(s) or Creative Head(s) responsible for the show's thematic development. By understanding who influenced this adaptation, Mr. Sonee can further assess whether his intellectual property rights were knowingly infringed.

In copyright law, broad themes or generic ideas are not typically protected. However, specific expressions and unique adaptations, particularly those with documented histories and established associations, fall within copyright



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protection. Mr. Sonee's unique conceptualization of "TIMEGOD" has been documented in print, digital, and audio-visual media long before Bigg Boss Season 18, establishing his exclusive association with the term. Therefore, Viacom18's argument that "time" is a universally acknowledged concept is not pertinent to this case. The issue lies not in the broad notion of time but in the specific title "TIMEGOD" and its philosophical representation as a divine entity.

For transparency, our client requests that Viacom18 disclose the names and roles of the scriptwriters and creative personnel responsible for Bigg Boss Season 18's theme development. By clarifying who influenced the "Time Ka Taandav" narrative, Mr. Sonee will have a clearer understanding of the degree to which his intellectual property may have been appropriated. Failure to disclose this information may be viewed as an attempt to conceal knowledge of potential infringement, which is actionable under copyright law.

4. Demand for Immediate Cessation of "TIMEGOD" Usage

In light of the clear overlap between "TIMEGOD" and Bigg Boss Season 18's theme, Mr. Sonee demands an immediate cessation of any reference to "TIMEGOD" or similar derivatives. This request is based on the explicit rights Mr. Sonee holds over his title and concept. Viacom18 is required to confirm the cessation of any further references or uses within three days of this rejoinder.



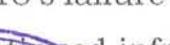
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Additionally, Viacom18 is asked to provide contact details for the scriptwriter(s) and composer(s) responsible for the development of this season's theme. This information is crucial for any potential future legal actions, as it would help determine the extent of creative involvement and influence behind the use of the "TIMEGOD" theme. Given the clear parallels between "TIMEGOD" and Bigg Boss Season 18's theme, Mr. Sonee demands that Viacom18 immediately cease any usage or references to "TIMEGOD" or any derivations thereof in connection with Bigg Boss. This demand is based on Mr. Sonee's rights as the original creator of the title and concept, rights that are legally protected by both copyright law and moral rights statutes.

- Immediate cessation involves halting:
 - All verbal or textual references to "TIMEGOD" or similar terms in Bigg Boss episodes.
 - Any visuals or symbols associated with Mr. Sonee's concept, including symbols or gestures that reinforce the "Time God" narrative.
 - Marketing or promotional content that leverages "TIMEGOD" or concepts inspired by it.

Viacom18's failure to cease the usage within three business days will be taken as a continued infringement, and Mr. Sonee will have grounds to initiate civil proceedings, seeking compensation for damages resulting from the unauthorized use of his intellectual property. Additionally, our client requires written confirmation that Viacom18 has ceased usage and that future references to "TIMEGOD" or any analogous representations are barred.





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Moreover, to ensure that Viacom18 can be held accountable in a potential legal setting, Mr. Sonee requests that the network provide contact details for the scriptwriters, composers, and producers who developed the "Time Ka Taandav" theme. This will enable our client to substantiate his claim that the theme was influenced by his original work, allowing him to seek restitution for this infringement.

5. Request for Title Modification and Apology

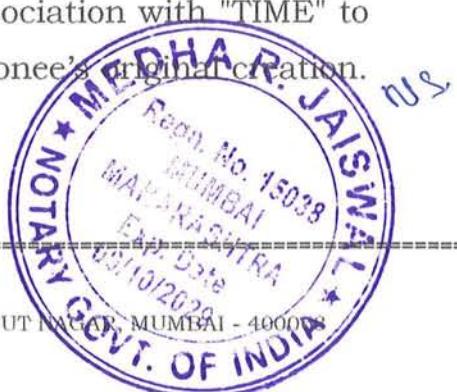
Mr. Sonee requests a formal apology for the unauthorized usage of "TIMEGOD." Additionally, he insists that Viacom18 modify the title, removing any reference to "GOD" to avoid infringement on his original work. As a suggestion, Mr. Sonee is amenable to alternate titles like "Lord Kaal Krishna" or other neutral variations without religious or divine connotations, as long as they do not infringe on the specific and original title of "TIMEGOD."

"In addition to cessation, Mr. Sonee seeks an official apology from Viacom18 for the unauthorized appropriation of his original work. This apology should acknowledge the error made in using his intellectual property without permission and commit to more rigorous internal checks to prevent such oversights in the future.

Moreover, Mr. Sonee requests that the title be modified. Viacom18 is encouraged to exclude any reference to "GOD" in association with "TIME" to distinguish Bigg Boss Season 18's theme from Mr. Sonee's original creation.

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"TIMEGOD" as a term is unique to Mr. Sonee and carries specific philosophical undertones that are not interchangeable with general references to "time." Therefore, the usage of "TIMEGOD" in Bigg Boss Season 18 unfairly capitalizes on Mr. Sonee's established brand.

Mr. Sonee is amenable to Viacom18's use of alternative terms that avoid direct or indirect association with "TIMEGOD." For example, a term such as "Lord Kaal Krishna" would provide mythological associations that align with Bigg Boss's intended theme without infringing upon Mr. Sonee's intellectual property. This suggestion respects both the show's intended direction and Mr. Sonee's exclusive association with "TIMEGOD."

6. Royalty Claim for Continued Use

If Viacom18 continues using the title or theme of "TIMEGOD" without modification, Mr. Sonee reserves the right to seek royalties based on the revenue generated by Bigg Boss Season 18. The "TIMEGOD" concept, with its documented history and established public recognition, constitutes valuable intellectual property, and any unauthorized use inherently deprives Mr. Sonee of potential revenue from his creation.

Royalty payments would represent fair compensation for Viacom18's exploitation of "TIMEGOD." This claim aligns with precedent where royalties are awarded to creators whose works are commercially used without authorization. Mr. Sonee also reserves the right to pursue additional claims

for damages, which would consider factors like reputational harm, loss of exclusive control over his concept, and the impact of diluted originality resulting from its usage in Bigg Boss Season 18.

Our client requests that Viacom18 confirm receipt of this letter and provide a response within three days, indicating either compliance with this demand or intention to negotiate a fair royalty arrangement.

7. Legal Consequences for Continued Infringement

In the event that Viacom18 disregards these requests, Mr. Sonee will proceed with civil and criminal actions against the network and all responsible parties. This includes Mr. Atul Kapoor, the show's scriptwriters, the Creative Head, host Salman Khan, and others involved in the unauthorized use of "TIMEGOD."

Mr. Sonee's potential actions include:

- Civil Proceedings: Seeking injunctive relief to stop further usage of "TIMEGOD" and claiming monetary damages for the network's unauthorized use.
- Criminal Proceedings: If warranted, filing complaints based on relevant intellectual property laws, including sections of the Copyright Act, that protect original creations against unauthorized adaptation and distribution.



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The legal repercussions of this infringement could extend beyond financial compensation. A judgment against Viacom18 could include penalties, injunctions, and public declarations of infringement, which may impact the network's reputation and brand integrity.

It is in the best interest of Viacom18 to address this matter promptly, respecting Mr. Sonee's rights as the rightful owner of "TIMEGOD." We look forward to an amicable resolution through compliance with these requests.

Our Client calls upon you to immediately act upon the requisitions stated above and compensate our Client for the loss suffered by them. Furthermore, our client states that the contents of this legal notice are without prejudice to the rights and remedies available to our client under Civil, Criminal, or any applicable law in force, and our client reserves its right to approach the appropriate legal forum to take necessary action against you and any party/parties that our client deems to be associated with your negligent acts, in any manner whatsoever.

We look forward to hearing from you within three (3) days hereof that you shall comply with all of the requisitions set herein above. We hope to have your co-operation and an amicable settlement.

Further, our client reserves his right to initiate suitable legal action against you as they are best advised, without any further notice to you whatsoever.



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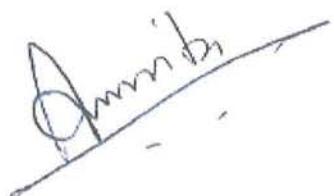
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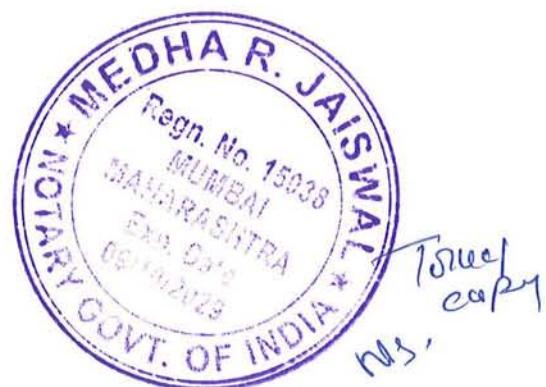
Email id: legal@vsipr.com | process@vsipr.com

Should you wish to discuss this matter, please free to contact me at the email mentioned: - legal@vsipr.com, process@vsipr.com

Yours sincerely,



Adv Amrita Dubey,
Advocate for the Client,
VS IPR AND LEGAL ADVISORS LLP



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FLAT NO 5, B WING SURYA KIRAN SOCIETY, DAHISAR EAST, NEAR AWADUT NAGAR, MUMBAI - 400068

[EMAIL/COURIER/RPAD]

11th November 2024

To
VS IPR AND LEGAL ADVISORS,
Adv. Vipul Bhatt/Adv. Amrita Dubey,
B-005, Surya Kiran Building,
Near St. Mary High School,
Awdhoot Nagar, Dahisar East,
Mumbai-400068

Email: legal@vsipr.com; amrita.vsipr@gmail.com; timegodofuniverse@gmail.com

Ref: - 1. Your Notice dated 23rd October 2024 regarding alleged Infringement of Your Client-Mr. Naresh Sonee's concept of "TIMEGOD" ("Notice")

2. Reply dated 5th November 2024 to the Notice to allegations regarding "TIMEGOD" concept and Related Claims in Bigg Boss Season 18 ("Reply").

3. Rejoinder dated 6th November 2024 to the Reply ("Rejoinder")

Sub: Sur-Rejoinder to the Rejoinder Dated 6th November 2024 regarding allegations on the Usage of "TIMEGOD" in Bigg Boss Season 18.

Dear Madam.

We, Viacom18 Media Private Limited ("Viacom18/We/V18/Our/Us"), a company registered under the Indian Companies Act, 1956, having Our registered office at 31st Floor, Tower-4, One Unity Centre, Senapati Bapat Marg, Prabhadevi, Mumbai – 40001 are in receipt of the rejoinder dated 6th November 2024.

At the outset, Viacom18 categorically denies all claims of infringement relating to 'TIMEGOD' and maintains that Bigg Boss Season 18 has not misappropriated any intellectual property purportedly owned by Your Client as alleged or even otherwise. We reiterate the contentions mentioned in our Reply dated 5th November 2024 and categorically refute Your Client's assertions as under: -

1. Original Creation and Registration of “TIMEGOD”:

We state that Your Client's contention regarding the concept of 'TIMEGOD' at best, may be considered as a purported philosophical expression that he may have professed the "TIMEGOD". However, the concept of time as a governing, supreme force is neither

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novel nor exclusive to Your Client. The theme of "Time Ka Taandav" in Bigg Boss Season 18 is based on universally recognized temporal themes. The expression of time as a powerful, overarching entity is a commonly used and followed trope found in various Indian and global cultural, religious, and artistic narratives.

We reiterate that Viacom18's usage of "Time Ka Taandav" in Bigg Boss Season 18 is an original concept independently developed by Our creative team and is rooted in well-established artistic expressions, devoid of any influence or adaptation from Your Client's purported work. The registrations and references of Your Client including a blog, YouTube channel, and article publications etc. do not constitute exclusive rights over the broad thematic concept of time as a potent force or deity, as they lack any substantial creative overlap with the narrative of Bigg Boss Season 18.

2. Definition and Distinctiveness of “TIMEGOD”:

Viacom18 categorically disagrees with Your Client's assertion that "TIMEGOD" is an exclusive concept that only he can reference or interpret. As per copyright law, a philosophical or spiritual notion does not confer exclusive rights over broad thematic or ideological concepts, particularly in the absence of distinct, protectable expressions. The term "TIMEGOD," as presented by Your Client, refers to an abstract belief or philosophical idea. In contrast, Bigg Boss Season 18 utilizes a theme based on fictional ~~gods~~ and a creative interpretation of time's influence on personal decisions and destiny, which is entirely unrelated to Your Client's purported spiritual and philosophical exploration.

3. Concerns Over Bigg Boss's "Time Ka Taandav" Theme

Viacom 18 reiterates that the theme of "Time Ka Taandav" is not derived from Your Client's purported concept of "TIMEGOD" as alleged or even otherwise. The notion of time as a consequential force is a common narrative device, widely accepted and available in the public domain. Our creative team has independently developed the theme of "Time Ka Taandav" in Bigg Boss Season 18 to artistically present the intertwining effects of the past, present, and future in a dramatic manner. No proprietary

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aspects of Your Client's purported concept have been utilized by Us. Notwithstanding the fact that concept per se is not protected under copyright law. Furthermore, Viacom18 reserves the right to protect its creative team from unwarranted claims and rejects any demand to disclose the identities of creative contributors to Your Client.

4. Demand for Immediate Cessation of "TIMEGOD" Usage:

Viacom18 firmly denies any misappropriation or unauthorized use of Your Client's purported concept. The theme of Bigg Boss Season 18, "Time Ka Taandav," does not infringe upon any of Your Client's purported rights or registered works. As a creative expression developed by Viacom18, this theme is entitled to full protection under copyright law, and Viacom18 declines Your Client's demands for cessation. Viacom18 views Your Client's contentions as baseless and a misinterpretation of his alleged intellectual property rights.

5. Request for Title Modification and Apology:

The title and theme of tasks in Bigg Boss Season 18 have been carefully crafted to represent an original creative work. No similarity exists that would warrant an apology or title modification, as the usage of "Time Ka Taandav" does not overlap with Your Client's alleged work in any manner. The demand for removal or modification lacks any legal basis under copyright or intellectual property law. Viacom18 will not concede to such an unjustified request and will protect its right to broadcast Bigg Boss Season 18 without interference.

6. Royalty Claim for Continued Use:

Your Client's claim for royalties is devoid of merit. "Time Ka Taandav" theme in Bigg Boss Season 18 does not utilize any proprietary concept or protected expression of Your Client's purported "TIMEGOD." Therefore, no basis exists for royalty payments or profit-sharing. Viacom18 maintains that Bigg Boss Season 18's theme is an independent creation and that Your Client's claim to royalties is unsubstantiated and legally untenable.

7. Legal Consequences for Continued Infringement:

Viacom18 stands prepared to address any legal proceedings that Your Client may pursue and the same shall be done entirely at Your Client's risk as to costs and consequences.



Viacom 18 Media Private Limited

31st Floor, Tower-4, One Unity Center, Senapati Bapat Marg, Prabhadevi, Mumbai - 400 013, Maharashtra, India.
T 022 6265 4040 | www.viacom18.com | CIN: U92100MH1995PTC095508

W.S.

We maintain that We have exercised Our creative rights within legal boundaries and that the allegations of infringement lack both factual and legal foundation. We reserve Our right to pursue damages and other legal remedies should Your Client initiate baseless litigation or attempt to malign the show's reputation or unjustifiably. Needless to say, the same shall be pursued at Your Client's costs.

In view of the above, Viacom18 denies all allegations of unauthorized use of the "TIMEGOD" concept, as no substantive similarity exists between "Time Ka Taandav" theme of Bigg Boss Season 18 and Your Client's purported work. We call upon Your Client to withdraw the Notice as well as the Rejoinder under reply, with immediate effect and refrain from making unsubstantiated claims or demands regarding "TIMEGOD" and cease any further legal threats, which serve only to undermine Viacom18's legitimate creative endeavors. Please consider this as a final communication on the issue from our end. We shall not entertain such frivolous claims and communications on the same subject henceforth. Please note that the same shall not be construed as an admission on our part and all rights in respect thereof are reserved by us.

Needless to state that despite the above facts and circumstances, should Your Client still initiate any legal action against Us, the same shall be defended by Us solely at Your Client's risk, as to costs and consequences. Viacom18 reserves the right to pursue appropriate legal action to protect its intellectual property and recover damages for any harm resulting from these unfounded allegations, which shall also be at Your Client's costs.

The present Sur-rejoinder is issued without prejudice to rights and remedies as available to Us in law and in equity. We specifically retain the right to issue a detailed para-wise reply to Your Notice should the need arise.

Yours sincerely,
For Viacom18 Media Private Limited

Authorized Signatory



True copy
N.S

Viacom 18 Media Private Limited

31st Floor, Tower-4, One Unity Center, Senapati Bapat Marg, Prabhadevi, Mumbai - 400 013, Maharashtra, India.
T 022 6265 4040 | www.viacom18.com | CIN U92100MH1995PTC095508

VS IPR & LEGAL ADVISORS



Contact No: 9372000165|8898979393|8652519622

Email id: legal@vsipr.com | process@vsipr.comLEGAL NOTICE

REGD.A. D/EMAIL

Without Prejudice

Ref.No.-A.D.37

DATE-11/11/2024

FROM,

VS IPR AND LEGAL ADVISORS LLP,
 ADV. VIPUL BHATT/ADV. AMRITA DUBEY,
 B-005, SURYA KIRAN BUILDING,
 NEAR ST. MARY HIGH SCHOOL,
 AWDHOOT NAGAR, DAHISAR EAST,
 MUMBAI-400068.

To,

VIACOM 18 MEDIA PRIVATE LIMITED,
 31 FLOOR, TOWER-4, ONE UNITY CENTER,
 SENAPATI BAPAT MARG, PRABHADEVI,
 MUMBAI - 400 013, MAHARASHTRA.



True copy
 [Signature]

WS

VS IPR & LEGAL ADVISORS

Contact No: 9372000165|8898979393|8652519622

Email id: legal@vsipr.com | process@vsipr.com

Subject: Final Urgent Rejoinder – Invitation for Amicable Resolution and Copyright Infringement Concerns Regarding "TIMEGOD" Title

Dear Viacom 18 Legal Team,

We represent Mr. Naresh Soni in this ongoing copyright infringement matter concerning the title "TIMEGOD" and its use in Bigg Boss Season 18. This letter serves as a formal rejoinder and invitation to engage in a mutually respectful, amicable resolution. We respectfully request your cooperation in preserving Mr. Soni's intellectual property rights and avoiding further escalation.

This document has been carefully constructed to address each aspect of the infringement and express the intent to avoid protracted litigation while respecting Viacom18's work. Below is a detailed summary of the legal and cultural bases for Mr. Soni's claims, the implications of continuing the use of "TIMEGOD," and the proposed steps to address the matter effectively.

1. Introduction to Mr. Soni's Unique Ownership and Use of "TIMEGOD"

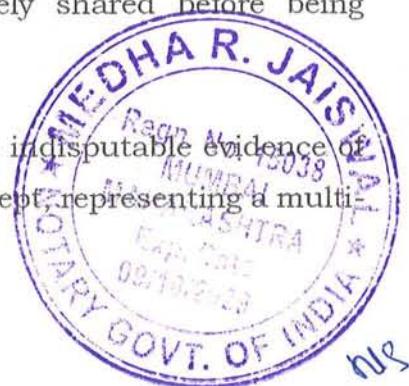
Mr. Soni's connection to "TIMEGOD" dates back nearly fifty years, originating from personal, philosophical teachings deeply embedded within his cultural and spiritual explorations. Unlike generic interpretations of time found in literature, philosophy, and mythology, Mr. Soni's "TIMEGOD" represents a distinct perspective: the embodiment of time as a divine entity commanding reverence, compassion, and spiritual acknowledgment.

In 1975, Mr. Soni began developing this term as a way to encourage self-reflection on human existence, the passage of time, and the inevitability of change. Over decades, he has intertwined the concept of "TIMEGOD" with his published works, artistic expressions, and spiritual messages, establishing it as an integral part of his personal philosophy. The term is not merely symbolic but a comprehensive, unique

representation of Mr. Soni's philosophy, one that he has been the sole architect of, with no antecedent in global religious or cultural frameworks.

To underscore his long-standing use and claim, Mr. Soni offers clear, historical evidence of his authorship and creative ownership:

- 1993 Calendar, "Worship TIMEGOD": This calendar, published over three decades ago, highlights the initial structured expression of his "TIMEGOD" philosophy, visually and textually depicting time as a godlike figure deserving respect and contemplation. Each calendar month featured thematic artwork and reflective messages related to time's role in our lives, merging artistic creation with philosophical insights.
- Social Media and YouTube Presence: With digital advancements, Mr. Soni adapted his message for broader audiences. His YouTube channel, launched on May 7, 2024, has rapidly gained subscribers interested in his teachings. This platform has become instrumental in reinforcing his claim over the term "TIMEGOD," offering content that reflects his original vision and allowing viewers to engage directly with his philosophy.
- Private Communications: On October 28, 2023, Mr. Soni shared his philosophical phrase "Waqt Khudda Sey Bada Hai" with Mr. Atul Kapoor, a member of your production team. This correspondence directly supports his claim by confirming that his ideas were privately shared before being appropriated in Bigg Boss Season 18.
- Each of these expressions of "TIMEGOD" serves as indisputable evidence of Mr. Soni's exclusive ownership of the term and concept, representing a multi-decade relationship with the title and its meaning.



2. Philosophical Distinction and the Cultural Foundation of “TIMEGOD”

In Mr. Soni's teachings, “TIMEGOD” is far more than a metaphorical or symbolic entity. He presents it as a tangible, Spiritual invisible omnipotent ageless ceaseless living being who had established the Universe, being that oversees human actions, lives, and destinies. This nuanced vision is deeply intertwined with Indian philosophical and spiritual beliefs about the nature of time, divine presence, and the universe. Importantly, “TIMEGOD” diverges from:

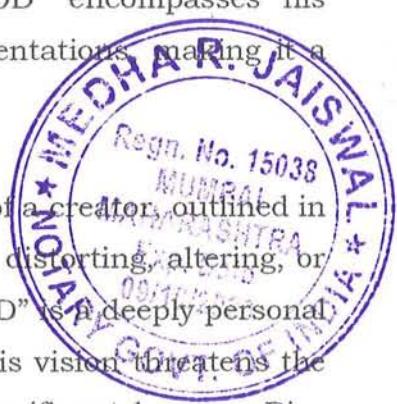
- Krishna as Kaal: While Lord Krishna declares himself as “Kaal” in the Bhagavad Gita, his representation of time is conceptual, reflecting an abstract embodiment of time's power. Mr. Soni's “TIMEGOD,” however, is a unique deity that connects directly with universe living, and non-living beings along with human lives, merging time's relentless nature with divine compassion.
- Shiva as MahaKaal: The concept of Shiva as MahaKaal, or the “great time,” signifies destruction and the end of the world in Hindu philosophy. In contrast, Mr. Soni's “TIMEGOD” is not bound by cyclical destruction but represents the ongoing, guiding force of time—worthy of worship not for its ending power, but its ever-present influence. It's ever omnipotent, omnipresent omniscient influence on entire Universe. According to Mr. Soni, TIMEGOD & SPACE had given birth to Universe and earthly deities and not vice versa.
- Chronos: Chronos, the Greek god of time, is primarily a literary figure symbolizing time's linear progression, unlike Mr. Soni's concept, which personifies time as a divine guardian. Where Chronos is viewed as a passive force, “TIMEGOD” is a deeply relational entity.

By developing "TIMEGOD," Mr. Soni has thus introduced a novel perspective that stands as a personal creation with no identical parallels across global religious, philosophical, or mythological systems. The distinctiveness of "TIMEGOD" resides in its role as a conscious, compassionate overseer, making it irreplaceable and uniquely associated with Mr. Soni's teachings.

3. Legal Foundation and Intellectual Property Rights of "TIMEGOD"

Mr. Soni's term "TIMEGOD" qualifies as intellectual property under both Indian Copyright Law and international copyright treaties. According to India's Copyright Act of 1957, any original artistic, literary, or philosophical expression qualifies for copyright protection upon creation. This protection extends to both tangible and intangible works, including titles that carry distinctive meanings and associations. "TIMEGOD," in Mr. Soni's usage, transcends mere descriptive language—it is a coined term representing his intellectual and spiritual output, warranting legal protection.

- Originality and Expression: Under Section 13 of the Copyright Act, original expressions that exhibit a unique combination of creativity and effort qualify for copyright. Mr. Soni's development of "TIMEGOD" encompasses his philosophical works, publications, and visual representations, making it a protected entity.
- Moral Rights and Right to Integrity: The moral rights of a creator, outlined in Section 57 of the Copyright Act, prohibit others from distorting, altering, or misrepresenting their work. Mr. Soni's term "TIMEGOD" is a deeply personal creation; any misuse in a context incongruent with his vision threatens the integrity of his work. This principle is particularly significant here, as Bigg Boss's portrayal diverges fundamentally from the philosophical essence Mr. Soni intended.



Viacom18's continued use of "TIMEGOD" without authorization risks infringing upon both Mr. Soni's exclusive rights and his moral right to prevent unauthorized alterations. Given the potential damages and legal precedents supporting creators' rights, Mr. Soni reserves the right to seek an injunction, damages, and reparations if this matter cannot be resolved amicably.

3.1 Evidence of Authorship and Usage

Mr. Soni provides a wealth of evidence attesting to his exclusive authorship and long-standing use of "TIMEGOD" as part of his unique philosophy, including:

- Blog Publication: "Waqt Khudda Sey Bada Hai" (Published January 31, 2012). Available at:
<https://waqt-time-poem-naresh-sonee.blogspot.com/2012/01/waqt-time-poem-in-hindi-by-naresh-sonee.html?m=1>
- 1993 Calendar: "Worship TIMEGOD," showcasing the philosophical tenets associated with TIMEGOD. Visual and textual expressions of his philosophy featured throughout the calendar:
<https://youtu.be/Y6CSfKMMKgk?si=5bUpTbyIHUHoeUtw>
- YouTube Channel: Mr. Soni's sacred philosophy on TIMEGOD, shared on his "Worship TIMEGOD" YouTube channel (Published May 7, 2024):
https://youtube.com/@worshiptimegod?si=_XJ5IE7sH3xml8lk
- Published Thesis: In The Times of India - Speaking Tree, his philosophy titled "Almighty God Revealed Via Time" was featured on September 8, 2012:
<https://www.google.com/amp/s/www.speakingtree.in/blog/almighty-god-revealed-via-time-quiz-naresh-sonee/m-lite>
- Additional YouTube Channel: The Worship Universe channel, showcasing his philosophy (Published October 3, 2019):
<https://youtu.be/O-l-gOoARbM?si=4zgQiH-foNiCCXL2>

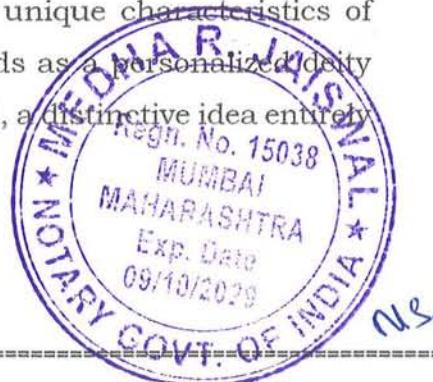
- Original Blog Thesis: "TIMEGOD Sacred Philosophy" dated July 10, 2008, elaborating on the concept's origin:
<https://timegodtookbirth.blogspot.com/2008/07/when-did-time-god-took-birth.html?m=1>
- Blog Reaffirmation: TIMEGOD thesis published in The Times of India - Speaking Tree, further supporting his claim (Published September 8, 2012):
<https://www.speakingtree.in/blog/almighty-god-revealed-via-time-quiz-naresh-sonee/m-lite>
- YouTube Presence: "Waqt Khudda Sey Bada Hai," a visual adaptation of his thesis, available here:
<https://youtu.be/tFyjwU45Kuo?si=XK4oHip4Z8cBDhoC>

These records establish Mr. Soni's longstanding, exclusive rights to "TIMEGOD," a deeply personal and original philosophy. Further failure to address these concerns will compel us to take the necessary legal actions to protect our client's intellectual and cultural heritage.

4. Examination of Viacom18's Response and Misinterpretation of "TIMEGOD"

In Viacom18's response, it was suggested that "TIMEGOD" is merely a derivative expression of universal themes. While it is understandable that mythological references are often complex and overlap across cultures, Mr. Soni's "TIMEGOD" is a singular and unprecedented concept:

- Conceptual Misinterpretation: Viacom18's references to "Kaal," "MahaKaal," and "Chronos" signify a misunderstanding of the unique characteristics of "TIMEGOD." Unlike these terms, "TIMEGOD" stands as a personalized deity representing a fusion of time's power with divine will, a distinctive idea entirely separates from other mythological uses.



- Non-Generic Status of "TIMEGOD": Courts have recognized that even generic terms can acquire distinct meanings when attached to a specific individual or body of work. For example, while the word "Boss" may seem generic, "Bigg Boss" has become distinctively associated with Viacom18. Similarly, "TIMEGOD" has attained unique status as Mr. Soni's proprietary expression.

The mere fact that "TIMEGOD" exists in English does not diminish its cultural weight; Mr. Soni's purpose has always been to bridge linguistic boundaries, making his teachings accessible to diverse audiences while retaining the sanctity of their meaning.

5. Alternative Titles Proposed to Avoid Infringement

In a genuine attempt to prevent extended legal conflict, Mr. Soni has offered alternative titles for your consideration. These options maintain the thematic essence of time while honoring the uniqueness of "TIMEGOD":

- Shiv Mahakala / Maha Shiv Kaal: Rooted in Hindu tradition, these alternatives reference the formidable aspect of Shiva while maintaining cultural integrity.



Kaal Krishna / Krishna Kaal: These titles acknowledge Krishna's association with time, aligning with Indian spiritual terminology without encroaching on "TIMEGOD".

Time Chrono / Time Kaal: These options merge universal concepts of time with Hindu mythology, preserving the philosophical underpinnings without direct overlap.

Each alternative serves to reflect the mythological inspiration Viacom18 desires while respecting Mr. Soni's exclusive rights to "TIMEGOD." By adopting one of these suggestions, Viacom18 would benefit from an authentic, culturally grounded title.

In addition to this, our client was forced to register an First Information report-FIR against the misuse of the term TIMEGOD, a copy of the same is attached as "Exhibit A."

6. Invitation for Mediation and Request for Immediate Response

In light of the above considerations, Mr. Soni invites Viacom18 to engage in a constructive dialogue within three days of receiving this letter. A meeting at a neutral venue between Malad and Andheri would be an ideal setting for this discussion, allowing both parties to collaboratively resolve this matter. Mr. Soni emphasizes his willingness to reach a peaceful solution and avoid unnecessary litigation.

Should Viacom18 decline this invitation or fail to respond within the requested timeframe, Mr. Soni will be compelled to pursue alternative actions, including:

6.1 Purpose and Spirit of the Mediation Request

Mr. Soni's primary objective in initiating this correspondence is to resolve the current copyright infringement issue in a constructive, respectful, and amicable manner. Given the significance of "TIMEGOD" within Mr. Soni's body of work and philosophy, he views this matter not simply as a legal dispute but as a personal mission to safeguard an idea that holds deep meaning for him and his followers. Through this mediation request, Mr. Soni is expressing his willingness to work with Viacom18 collaboratively rather than adversarially, in order to avoid unnecessary litigation, which could prove costly, time-consuming, and detrimental to both parties' reputations.

Mr. Soni believes that a meeting between both parties' representatives could facilitate open dialogue, clear any misunderstandings, and allow for an exchange of perspectives. He envisions this mediation as an opportunity for Viacom18 to better understand his perspective and acknowledge the cultural and philosophical

significance of "TIMEGOD" beyond its basic function as a title or trademark. This is why he has opted to issue this letter as an invitation rather than a warning, underscoring his preference for cooperation over confrontation.

6.2 Suggested Format and Venue for the Meeting

To demonstrate flexibility and his earnest desire for resolution, Mr. Soni has proposed a neutral meeting venue in a convenient location between Malad and Andheri. By selecting a midpoint location, he intends to emphasize that this invitation is made in good faith, accommodating Viacom18's convenience and ensuring that logistical concerns do not hinder this opportunity for dialogue.

The proposed setting of a neutral hotel or restaurant would provide an informal yet professional environment conducive to open, honest discussion. Mr. Soni believes that a face-to-face meeting, as opposed to virtual or written communication, would better facilitate mutual understanding, allowing for the nuances of his concerns and the depth of his attachment to "TIMEGOD" to be more effectively conveyed. Furthermore, he believes that this format could help alleviate any tensions and foster goodwill, making it easier for both parties to reach a resolution.

6.3 Expected Topics of Discussion and Proposed Resolutions

Mr. Soni's intention in this meeting is not only to present his concerns in greater depth but also to actively listen to Viacom18's reasoning behind the use of "TIMEGOD" in Bigg Boss Season 18. He envisions the following topics as essential to the discussion, with the aim of finding a mutually acceptable resolution:

- **Intellectual Property Concerns:** A thorough examination of Mr. Soni's claim to the exclusive use of "TIMEGOD" as an original concept and title. He hopes to

discuss the ways in which “TIMEGOD” has become a symbol of his personal philosophy and cultural beliefs, offering Viacom18 insight into why its unauthorized use is both legally and ethically problematic.

- Alternative Titles and Rebranding Options: Mr. Soni has proposed several culturally relevant alternatives to “TIMEGOD,” such as “Shiv Mahakala,” “Krishna Kaal,” or “Samay Krishna.” He is open to exploring further options that align with Viacom18’s thematic requirements while preserving the integrity of his work. Mr. Soni’s goal is to assist Viacom18 in selecting a title that complements Bigg Boss’s format without infringing on his intellectual property.
- Potential for Compensation or Licensing: Should Viacom18 insist on retaining the “TIMEGOD” title, Mr. Soni is willing to consider licensing or compensation arrangements. However, he emphasizes that any agreement would need to uphold the sacred value he attributes to “TIMEGOD” and that he would expect to be involved in the oversight of its usage to prevent misrepresentation.
- Reparations for Reputational Damage: Given the use of “TIMEGOD” in a manner inconsistent with Mr. Soni’s philosophical intentions, he intends to request reparations for the reputational harm he has endured. In his view, associating “TIMEGOD” with a reality television show compromises the term’s sacred connotations. He seeks acknowledgment of this harm and fair compensation, which could include public clarification of his exclusive rights to the concept of “TIMEGOD” and assurances regarding its future use.

6.4 Formal Notice of Legal and Public Escalation

While Mr. Soni prefers an amicable resolution, he feels compelled to clarify his intended course of action if Viacom18 does not respond within three days or if the



meeting does not lead to a satisfactory outcome. His primary focus is on resolving the issue privately to avoid the potential reputational impact on Viacom18 and its associates, including prominent personalities involved in Bigg Boss. Nonetheless, Mr. Soni is prepared to escalate the matter through the following avenues:

- Legal Action: Mr. Soni is prepared to file for an injunction against Viacom18 to immediately cease the use of "TIMEGOD" in Bigg Boss Season 18. He intends to pursue this action under the Copyright Act, citing his exclusive rights to the term. Should this step become necessary, he will seek damages for the unauthorized usage and any additional compensation for the emotional and reputational toll resulting from this infringement.
- Public Advocacy: Mr. Soni views "TIMEGOD" as a valuable and culturally resonant concept, and he feels a moral obligation to protect it. He plans to raise public awareness regarding Viacom18's alleged infringement through public forums, including social media and press releases. By doing so, he hopes to educate the public on intellectual property rights, particularly as they pertain to original cultural and philosophical concepts like "TIMEGOD."
- Reputational Damages: Given the spiritual and philosophical nature of Mr. Soni's work, he feels the unauthorized use of "TIMEGOD" has cast a shadow on his reputation as a creator and philosopher. If Viacom18 continues using the term without his authorization, he will seek compensation for this reputational damage, including acknowledgment of his rights to "TIMEGOD" and a public apology clarifying Viacom18's unauthorized usage.

6.5 Emphasizing the Ethical Dimension of the Request

Mr. Soni emphasizes that his pursuit of a meeting is rooted not only in legal concerns but also in a broader ethical responsibility. In his view, "TIMEGOD" is more than an

intellectual property; it reflects a deeply personal and spiritually resonant philosophy. He firmly believes that Viacom18, as a major media entity with considerable influence, should uphold ethical standards by respecting the intellectual and cultural creations of individuals. By resolving this matter through mediation, Viacom18 would demonstrate its commitment to these values, setting a positive example for others in the media and entertainment industry.

Mr. Soni hopes that this request serves as a reminder of the importance of ethical stewardship in handling concepts with deep cultural significance. In seeking this meeting, he invites Viacom18 to engage not only in legal discourse but also in a meaningful conversation about cultural respect, intellectual integrity, and the shared responsibility to preserve original ideas.

6.6 Timeline and Urgency of the Response

In view of the ongoing infringement and the harm it continues to inflict on Mr. Soni's reputation and rights, he respectfully requests a response within three days of receiving this rejoinder. This timeline is intended to reflect the urgency of the situation, given the continuing impact of Bigg Boss's use of "TIMEGOD" on Mr. Soni's body of work and the potential for further harm. If Viacom18 accepts this invitation, Mr. Soni will gladly coordinate with the company's legal representatives to arrange a mutually convenient time for the meeting.

Mr. Naresh Soni's invitation for a constructive and amicable resolution reflects his sincere desire to protect his intellectual and cultural property while avoiding unnecessary legal disputes. By proposing a meeting in good faith, he provides Viacom18 with an opportunity to resolve this matter efficiently, preventing further damage to both parties and ensuring respect for the sacred and philosophical significance of the "TIMEGOD" concept. Mr. Soni's dedication to preserving the integrity of his work and reputation highlights his preference for a solution that upholds both legal rights and ethical considerations. However, should Viacom18



choose not to engage or respond, Mr. Soni will be compelled to take the necessary legal and public actions to safeguard his intellectual property and protect the essence of his creation.

This letter marks a pivotal moment, offering Viacom18 a final chance to address the issue responsibly and avoid conflict, demonstrating respect for Mr. Soni's creative rights and the cultural values embodied in "TIMEGOD."

Please be advised that any further delay by Viacom18 in addressing and resolving this matter will only compound the financial repercussions. Each day that passes without an amicable settlement or actionable response exacerbates the harm to Mr. Soni's intellectual property, reputation, and the cultural integrity of his "TIMEGOD" philosophy. Consequently, the compensation and royalty claims associated with the unauthorized use of "TIMEGOD" will continue to escalate.

Mr. Soni's philosophy, which has been meticulously cultivated over decades, holds significant cultural, philosophical, and intellectual value. The longer Viacom18 utilizes this concept without authorization, the greater the infringement on these rights, leading to a substantial increase in both direct and reputational damages. The unauthorized use of "TIMEGOD" in association with a popular television show not only misrepresents but also dilutes the sanctity and uniqueness of Mr. Soni's work. Therefore, each instance of continued usage further entrenches the violation of his rights, warranting enhanced compensatory damages.

In addition to compensation, Mr. Soni reserves the right to seek an escalating royalty fee proportional to the ongoing exposure and potential profit derived by Viacom18 through the exploitation of his intellectual property. This royalty, which would reflect both the commercial gains from the use of "TIMEGOD" and the cultural value it holds, will increase with each day that Viacom18 fails to resolve the infringement.

We urge Viacom18 to take swift action to address this issue and propose a resolution without further delay. Should Viacom18 persist in overlooking these concerns, our

client will be compelled to intensify his claims to protect his rights, including claims for higher compensation and royalties commensurate with the prolonged infringement. We hope Viacom18 recognizes the urgency and gravity of this matter and responds accordingly to prevent further escalation.

Further, our client reserves his right to initiate suitable legal action against you as they are best advised, without any further notice to you whatsoever.

Should you wish to discuss this matter, please feel free to contact me at the email mentioned: - legal@vsipr.com, process@vsipr.com

Sincerely,



Adv. Amrita Dubey,
Advocate for Client,
VS IPR & LEGAL ADVISORS LLP



True copy
MS,

EXHIBIT A -21

To.
 Salim Khan ji & Salman Khan ji,
 Galaxy
 Mumbai

Dear Salim Khan ji & Salman Khan ji,

Sub: Humble request to protect my Copyrighted- My Authored Title and Sacred Scriptures devoted exclusively to Honourable Supreme **TIMEGOD** which is being infringed by Viacom18 , Endomol keeping their this season reality show name as BIG BOSS TIMEGOD Ka Tandav

I humbly want to ask You - What action would you take on me if i use **Dabangg** title without your permission and shamelessly starts minting crores of rupees from same ?

I humbly appeal to your kindness, seeking JUSTICE from YOU, for this infringement of my copyrighted title TIMEGOD to whom I consider my Deity and His sacred scriptures, which I have authored and am being worshiping since 1975. TIMEGOD scriptures are devoted exclusively to Waqt/Samay/Time that holds an utmost religious and deep emotional significance for me and TIMEGOD's followers.

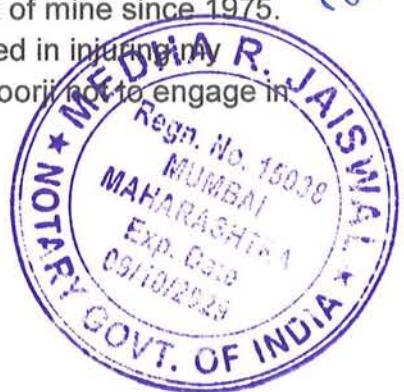
Making You aware, In 2019, **Atul Kapoor ji** (BIGBOSS' VOICE) had lend his voiceover to my authored scriptures **BRAHMAND PUJAN – BRAHM GYAN (1999)** . This scripture of mine are free on Youtube. I never in my dream can think of minting money on God's name. It's against my ethics and logics.

Since November 2023, On WhatsApp I was sharing many Almighty TIMEGOD's scriptures with Atul Kapoor ji .

But, I was shocked and perplexed to observe that **Mr. Kapoor ji started using my TIMEGOD title and plagiarized my scriptures without my permission**. Knowingly that This TIMEGOD title and all my devoted scriptures to HIM are deeply revered sacred and are my integral part of my spiritual identity and holy practice.

Atul Kapoorji ji, had given his voice to my written sacred scriptures BRAHMANDPUJAN (1999) . Atulji ji, knew that TIMEGOD is deeply ingrained in my soul. As I breath TIMEGOD's & BRAHMAND's names and mantras in every beat of mine since 1975. Unintentionally You Salman Khan , **Jio Cinema** are also involved in injuring my sentiments 24x7. Since 21 Oct 2024, I had pleaded to Atul Kapoorji not to engage in

True COPY



mockery of TIMEGOD in his BigBoss show. And to urgently share all my messages to You Salman Khan. But he said, he don't have any access to You and producers.

Since over a month , Big Boss Reality Show , its- Daily violations, disrespecting my TIMEGOD's scriptures, making mockery (mazak) on Colour TV, Jio Cinema, and social media platforms. This is causing me immense, unbearable pain, emotional distress giving me sleepless weeping days and nights.

Salim ji you are a celebrity dignified author. India respects you. Your genes are in Salman. When I see him loving his parents like God and committed for his entire family. I can imagine how super son Allah had gifted to specially you and your Spouse.

You see, today, I cannot focus on my work and my family. I am completely shattered. It's very much paining and hurting to see in Big Boss, matured persons like Atul Kapoorji and Salman Khan ji you, daily making *fun* of my TIMEGOD reducing my GOD to a puppet or *madari* show of BigBoss. Salman you are younger to me. Will anybody appreciate, if somebody openly do mockery of his personal Deity or Prophet? So please kindly empathy me.

I understand Salman you and Jio Cinema are unintentional involved because of some1 else's error. But the harm is undeniable and unbearable. Murder caused by strangling or an accidental loss of a life. Both amounts to death. Isn't it?

Who can explain to a wise sensible story teller like Salim Khan ji. Humanitarian Sentiments are in your genes. I can make out.

Salman, Your intervention, as an India's most popular and loved celebrity and philanthropist My Instinct says - You can bring a resolution in a minute. . भगवान ने आपको सब कुछ दिया है। मेरे TIMEGOD को बछा दो प्लीज। मैं लिखते लिखते रो रहा हूँ। संघर्षसंय जीवन में दुख तो बहुत आए, मन तो बहुत बार रोया होगा। किसी तरह आंसू थाम लेता था, पर अब की बार आंसू थमने का नाम नहीं ले रहे। मेरा दिल बहुत दुखी है।

जो कुछ हो रहा है, अच्छा नहीं हो रहा है। बहुत दर्द हो रहा है मुझे। मेरे अंतर्मन की गहराइयों को जो प्रति रोज प्रहार हो रहा है, कृपा उस पीड़ा को अनुभव कर एहसास कीजिए और उसे कम करने में मदद कीजिए Salman. मेरे TIMEGOD को सम्मान दीजिए और दिलाइए। मुझे न्याय दिलाइए।

Throughout life, my mission was not to promote my personal photos . I never did so in past or in this instant digital era. I prefer to stay aloof. I am totally against monetarily selling my TIME GOD for my personal gain and fame. But then, I was sincerely making people aware sharing my thoughts through my scriptures and songs devoted only to

Worship TIMEGOD & UNIVERSE. Because I strongly believe that's Only TIMEGOD had created the Universe. TIMEGOD Creates and Destroys suns, planets, living and non living beings. पर आप सभी ने जाने अनजाने में मेरे TIMEGOD को और मुझे मार दिया. मैं जीवन में केवल 'टाइम गॉड' और 'ब्रह्मांड' के प्रचार के लिए ही जी रहा था। यह मेरी साँसें थी। मेरे जीने का मकसद था। किसी एक की महत्वाकांक्षा या गलती ने मेरा सब कुछ नष्ट कर उज़ाद दिया। अब मेरे पास शब्द ही नहीं बचे हैं अपना दुख और निराशा शब्दों में व्यक्त करने के लिए।

जहाँ Google या Youtube पर TIME GOD लिखने पर viewers और seekers को मेरे TIME GOD की तरफ अल्गोरिथ्म ले जाते थे, अब सभी Youtube और News आपके BigBoss के TIMEGOD से भर गए हैं। मेरे TIMEGOD को भी सनी लियोन और राखी सावंत जैसा फेमस बना दिया आपके शो बिगबॉस और उसके प्रमोशन ने।

मैं आपका मुकाबला नहीं कर सकता हूँ। न ही मैं लड़ना जानता हूँ। पर क्या मुझे मेरे Sacred Scriptures, merey Deity को Defend करने का अधिकारी है, सलमान? सलीम जी तो लेखक का दर्द भली भाँति जानते हैं।

I could have hurried and shared all these facts and developments on social media. Sought journalists interventions to get attention. Hurried to court. But I am not a person to tarnish anybody's image in my wildest dream also. I am against cheap publicity. So please empathy, listen to my plea. You have all the mighty power to ask Viacom to stop mockery of TIMEGOD and ask the producers to apologise to TIMEGOD on show.

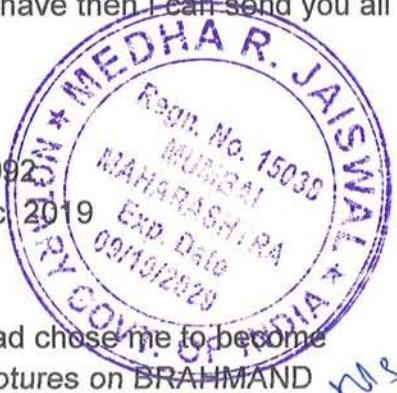
Here I can attach evidences:

- A Pen drive having video recordings of WhatsApp chat happened between Atul Kapoor ji and me since Nov 2023 , but then the best way is to ask Atul Kapoor to show his WhatsApp. If you still don't believe in me. And if he doesn't have then I can send you all in video recordings.

I am attaching here:

- Calendar copy 1993 of Worship TIMEGOD published in 1992
- Copyright certificate of WORSHIP TIMEGOD Dated 5 Dec 2019
- Screen Writer Association copyrighted dated 16 Oct, 2019

Probably, in world's history TIMEGOD & UNIVERSE both had chose me to become their first devout follower or say their agent. The sacred scriptures on BRAHMAND PUJAN Brahm Gyan- (published in 1999) written by me are praised by Scholars &



Dignitaries, High Court Justices, Earth Science Ministry, Add. Solicitor General of India, Advocates, Journalists, Doctors, Literates from all walk of life.

My Youtube channel on TIME GOD is active since May 7, 2024.

My poems and songs on TIME GOD are there on 'Worship Universe Brahmand Pujan' Youtube Channel Since 2020 ,

And you can still read ALMIGHTY TIMEGOD QUIZ on Times of India-Speaking Tree published on Sep 8 , 2012 giving a type search on Google or Youtube **TIMEGOD naresh sonee**.

Salman, I implore you to address this issue, immediately, prevent future infringements, and soothe my pain by stopping the script composer refraining them from doing mockery of TIMEGOD. Your wise decision will uphold ethics and justice.

Kindly consider my plea, You both posing as a Justice. I pray TIMEGOD and the UNIVERSE to bless You and Your parents with wisdom, good long healthy life.

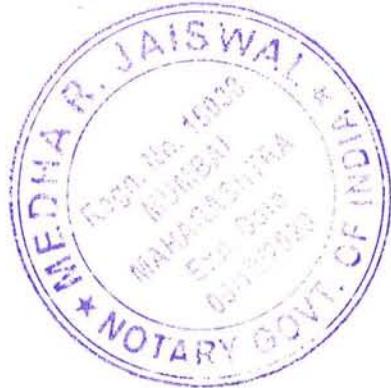
Looking forward to hear from you asap , so that I know what's your opinion. This will enable me to decide on how to protect my TIMEGOD copyrights.

Sincerely, With Utmost Regards To You both,

naresh sonee. (soni)

My Mobile No.: 9323002131

Address: A402, Keshav Mansion Bldg, EverShine Nagar, Malad West Mumbai 400 064



To.
 Shri Mukesh Ambani
 Antilla
 Mumbai

Dear Respected
 Shri Mukesh Ambani ji & Smt. Nita Ambani ji,

Sub: Humble request to protect my Copyrighted- My authored Title and Sacred Scriptures devoted exclusively to Honourable Supreme **TIMEGOD** which had been infringed by Viacom & Endemol in their BIG BOSS Reality Show naming as **TIMEGOD** Ka Tandav and unknowingly your **Jio Cinema** is also instrumental in broadcasting / streaming the same .

I humbly appeal to your kindness, seeking JUSTICE from YOU, for the infringement of my copyrighted title **TIMEGOD** and His sacred scriptures happening in Big Boss18 Reality Show, which your **Jio Cinema** is streaming. I worship **TIMEGOD** since 1975. I had authored **TIMEGOD** scriptures those are devoted exclusively to HIM and I am educating the followers absolutely freely since and before Internet was launched in the world.

Mukesh ji , **TIMEGOD** holds an utmost religious and deep emotional significance for me and **TIMEGOD**'s followers.

I have it's copyrights certified from Government of India and also SWA in 2019.

My humble question here to you is very simple ji : if , without your knowledge and permission, if i use shamelessly start using your **Reliance** or **Jio Cinema** name and mint crores of rupees – What action you will take on me ? So here I request you to please empathy me and solve my matter.

Making You aware, In 2019, **Atul Kapoor ji** (BIGBOSS' VOICE) had lend his voiceover to my authored scriptures **BRAHMAND PUJAN – BRAHM GYAN (1999)** .

Since November 2023, On WhatsApp I was sharing many Almighty **TIMEGOD's scriptures with Atul Kapoor ji (Big Boss's Voice)**

But, I was shocked and perplexed to observe that **Mr. Kapoor ji started using my **TIMEGOD** title and plagiarized my scriptures without my permission**. Knowing that This **TIMEGOD** title and all my devoted scriptures to HIM are deeply revered sacred and are my integral part of my spiritual identity and practice.



Atul ji, knew that TIMEGOD is deeply ingrained in my soul. As I breath TIMEGOD's & BRAHMAND's names and mantras in every beat of mine since 1975. Unintentionally Your **Jio Cinema** is also involved in injuring my sentiments 24x7. Since 21Oct 2024, I had requested to Atul Kapoorji not to engage in mockery of TIMEGOD in his BigBoss show. Plus share all my messages to Salman Khan. But he said, he don't have any access to him and producers.

Since over a month , Big Boss Reality Show , its Daily violations, disrespecting my TIMEGOD's scriptures, making mockery (mazak) on Colour TV, Jio Cinema, and social media platforms. This is causing me immense, unbearable pain, emotional distress giving me sleepless weeping days and nights.

Mukesh ji & Nitaji , I cannot focus on my work and my family. I am completely shattered. It's very much paining and hurting to see in Big Boss, matured persons like Atul Kapoorji , Salman Khan ji, daily making *fun* of my TIMEGOD reducing my GOD to a puppet or *madari* show of BigBoss. Will anybody appreciate, if somebody openly do mockery of his personal Deity or Prophet? So please empathy me.

I understand Jio Cinema's unintentional involvement, but the harm is undeniable and unbearable. Murder caused by strangling or an accidental loss of a life. Both amounts to death. Isn't it?

A proper research should have been done by not only Viacom 18 , Endomol , Salman team , but also your team. Don't you think so?

Mukesh ji, Your intervention, as a respected, responsible, renowned corporate figure one among the mightiest tycoon entity on the earth, You being a great visionary, ethic abiding leader of the world , You can bring a resolution in a minute. भगवान ने आपको सब कुछ दिया है। मेरे TIMEGOD को बछा दो प्लीज। मैं लिखते लिखते रो रहा हूँ। संघर्षमय जीवन में दुख तो बहुत आए, मन तो बहुत बार रोया होगा। किसी तरह आंसू थाम लेता था, पर अब की बार आंसू थमने का नाम नहीं ले रहे। मेरा दिल बहुत दुखी है।

जो कुछ हो रहा है, अच्छा नहीं हो रहा है। बहुत दर्द हो रहा है मुझे। मेरे अंतर्मन की गहराइयों को जो प्रति रोज़ प्रहार हो रहा है, कृपा उस पीड़ा को अनुभव कर, एहसास कीजिए और उस्से कम करने में मदद कीजिए। अम्बानी जी। मेरे TIMEGOD को सम्मान दीजिए और दिलाइए। मुझे न्याय भी दिलाइए।

Throughout life my mission was not to promote my personal photos. I never ever posted my own photographs in past or in this digital era. I prefer to stay aloof. I am totally against monetarily selling my TIME GOD for my personal gain and fame. But then, I was sincerely making people aware sharing my thoughts through my scriptures and songs

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उज्जाद दिया। अब मेरे पास शब्द ही नहीं बचे हैं अपना दुख और निराशा शब्दों में व्यक्त करने के लिए। "I could have hurried to share all these facts on social media. Seeking media journalists interventions and attentions. Approached court . But I am not a person to tarnish anybody's image. I am against cheap publicity. So please empathy listen to my plea. Defending my self and my Deity , isn't my right ? Mukesh ji , You have all the mighty power to stop mockery of TIMEGOD and ask the producers to apologise to TIMEGOD on show.

Here I can attach evidences:

- A Pen drive having video recordings of WhatsApp chat happened between Atul Kapoor ji and me since Nov 2023 , but then you can demand from him. And if he doesn't have the records. I shall send you.

I am attaching here :

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My Youtube channel on TIME GOD is active since May 7, 2024.

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And you can still read ALMIGHTY TIMEGOD QUIZ on Times of India-Speaking Tree published on Sep 8 , 2012 giving a type search on Google or Youtube TIMEGOD naresh sonee.



Mukesh ji, I implore you to address this issue, immediately, prevent future infringements, and soothe my pain by stopping the script composer refraining them from doing mockery of my deity TIMEGOD. Your wise decision will uphold ethics and justice.

Kindly consider my plea , YOU posing as a Justice. I pray TIMEGOD and the UNIVERSE to bless you both and your family with wisdom and good health.

Sincerely, With Utmost Regards To You both, I wait for your reply asap. so that I know what's your opinion. This will enable me to decide on how to protect my TIMEGOD copyrights.

naresh sonee. (soni)

My Mobile No.: 9323002131

Address: A402, Keshav Mansion Bldg, EverShine Nagar, Malad West Mumbai 400 064



EXHIBIT A-22

Date : 10th November 2024

To,
Senior Police Inspector,
Bangur Nagar Police Station,
MindSpace, Malad West,
Mumbai.

Subject: Complaint of Copyright Infringement and Disrespect towards Sacred Entity TIMEGOD

Dear Sir/Madam,

I, Naresh Soni, hereby submit this complaint regarding copyright infringement and disrespect towards my sacred entity TIMEGOD.

Since 1975, I have revered TIMEGOD as my deity. My scriptures, thesis, and title have been copyrighted since 2019, certified by the Government of India.

Unfortunately, Color TV's BIG BOSS 18 Reality Show producers, Viacom 18 and Endemol, have infringed upon my copyrighted material. This occurred after I shared my TIMEGOD scriptures with BIG BOSS voice-over actor Atul Kapoor on his WhatsApp in October/November 2023.

My advocate has served notices to all parties directly or indirectly connected to BIG BOSS 18. Viacom18 replied, and my advocate responded with a rejoinder.

While seeking amicable solutions from Viacom18 and associates, I urge them to respect my sacred TIMEGOD and cease infringement. Continuing disrespect and infringement will compel me to raise awareness among the Indian public and pursue legal action against all involved parties.

Consider this letter my first complaint and FIR.

Details:

Name: Naresh Soni
Mobile: 9323002131
Address: A-402, Keshav Mansion Bldg, EverShine Nagar, Malad West, Mumbai 400064

Thank you for your attention to this matter.

Sincerely,

Naresh Soni (Sonu)
10/11/2024

रियकारण
.....
.....
बांगुरनगर पोलीस स्टेशन, मुंबई
दि. 10.11.2024 वा. 10.45.00



BIGG BOSS 18 TIME GOD Ka Tanadav

Infringements & Plagiarisation On Youtube

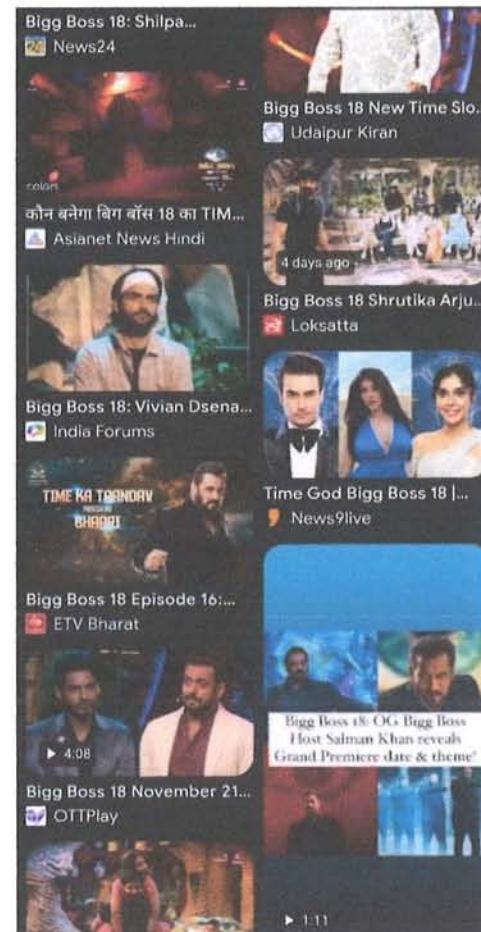
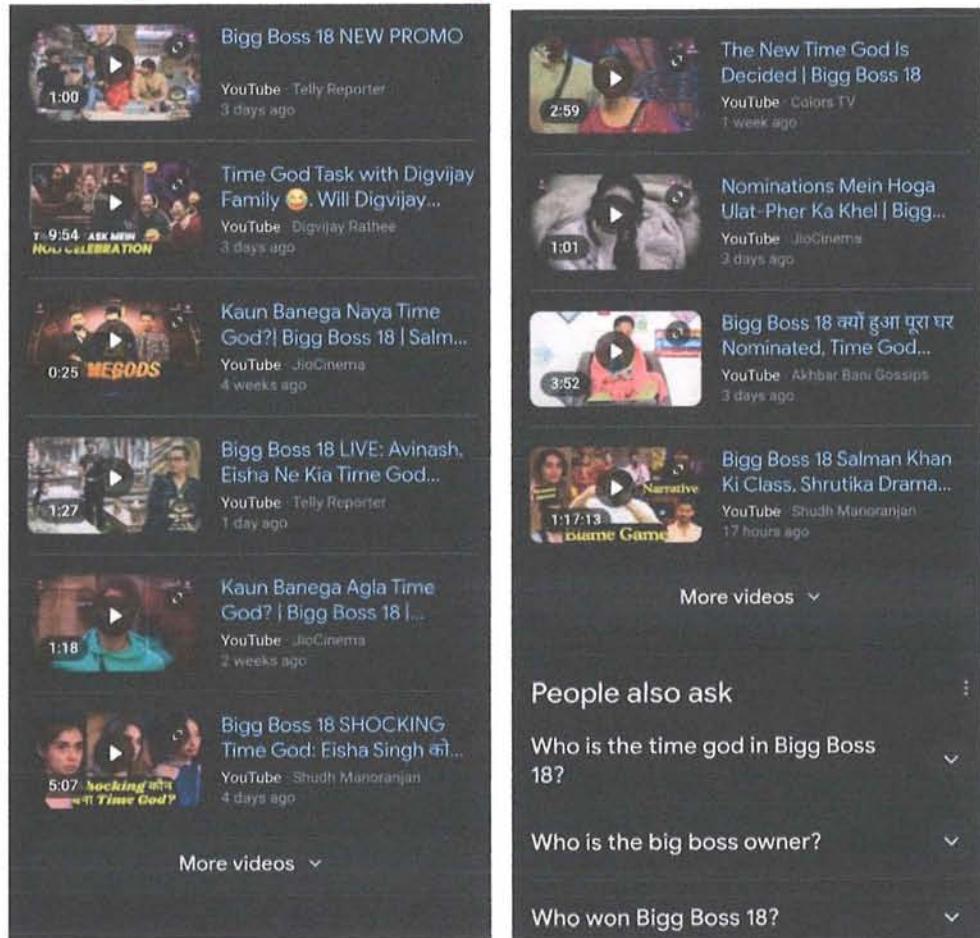


True copy
MSJ



BIGG BOSS 18 TIME GOD Ka Tanadav

Infringements & Plagiarisation On Youtube



People also ask

Who is the time god in Bigg Boss 18?

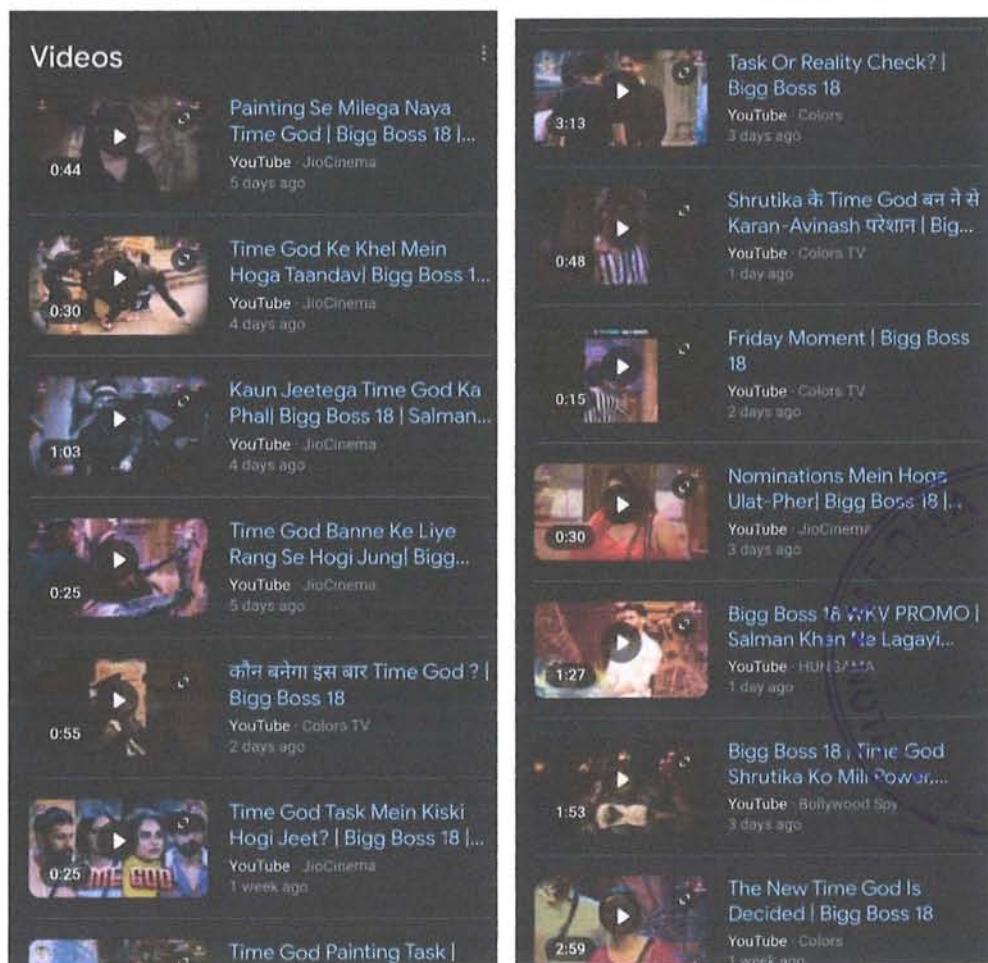
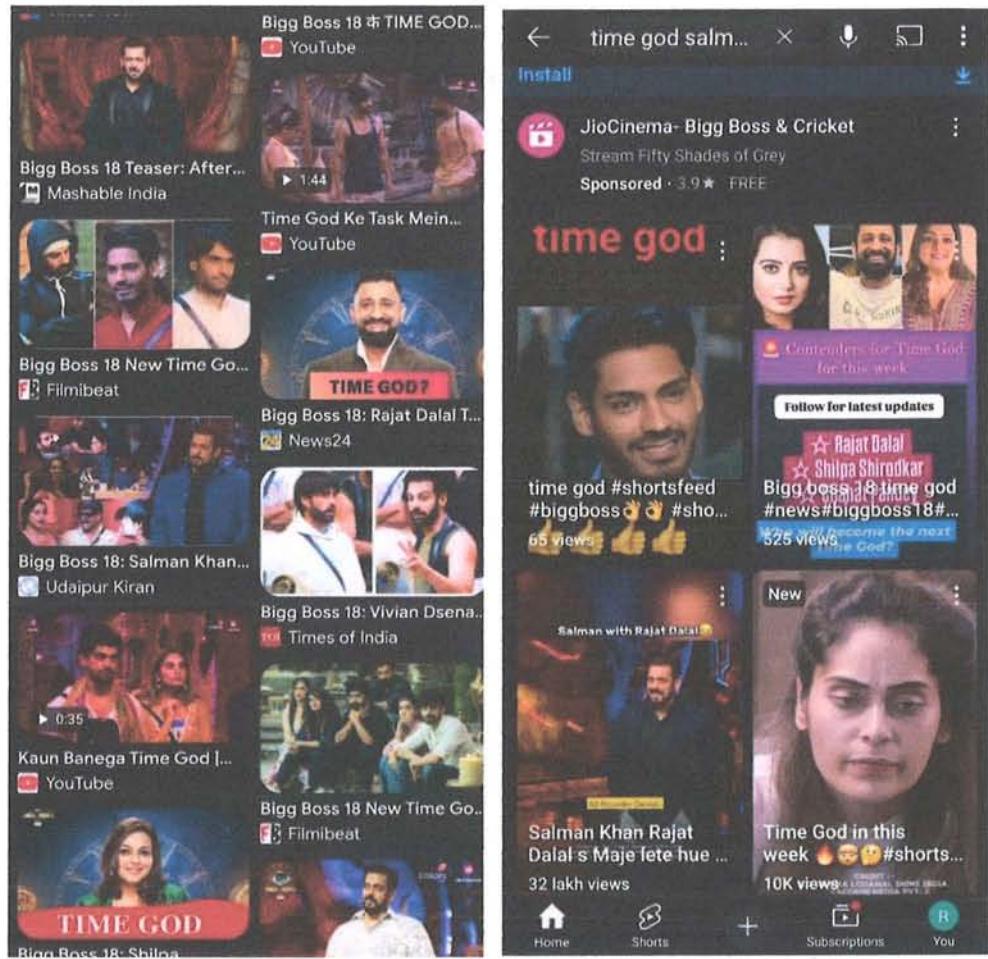
Who is the big boss owner?

Who won Bigg Boss 18?



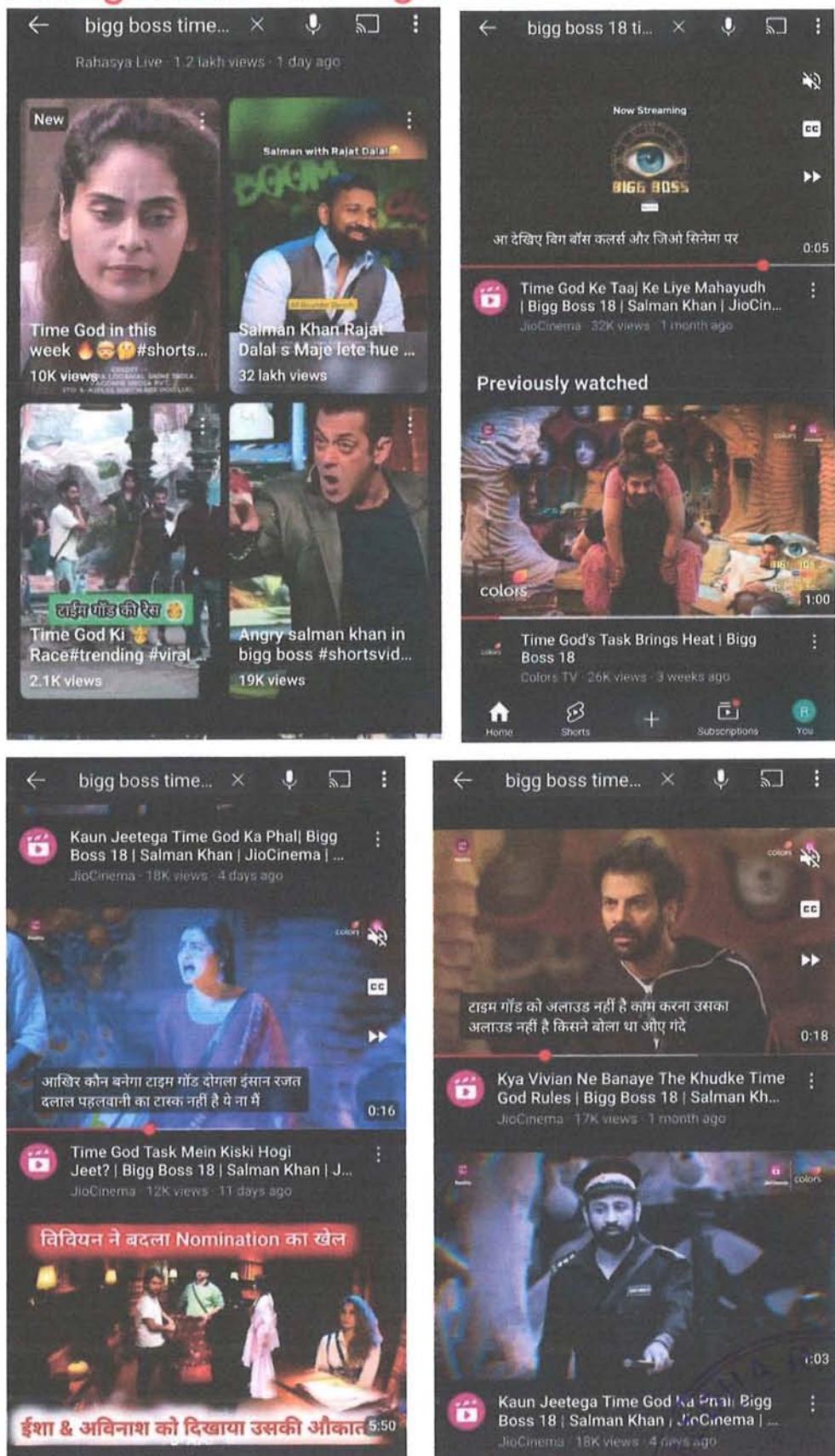
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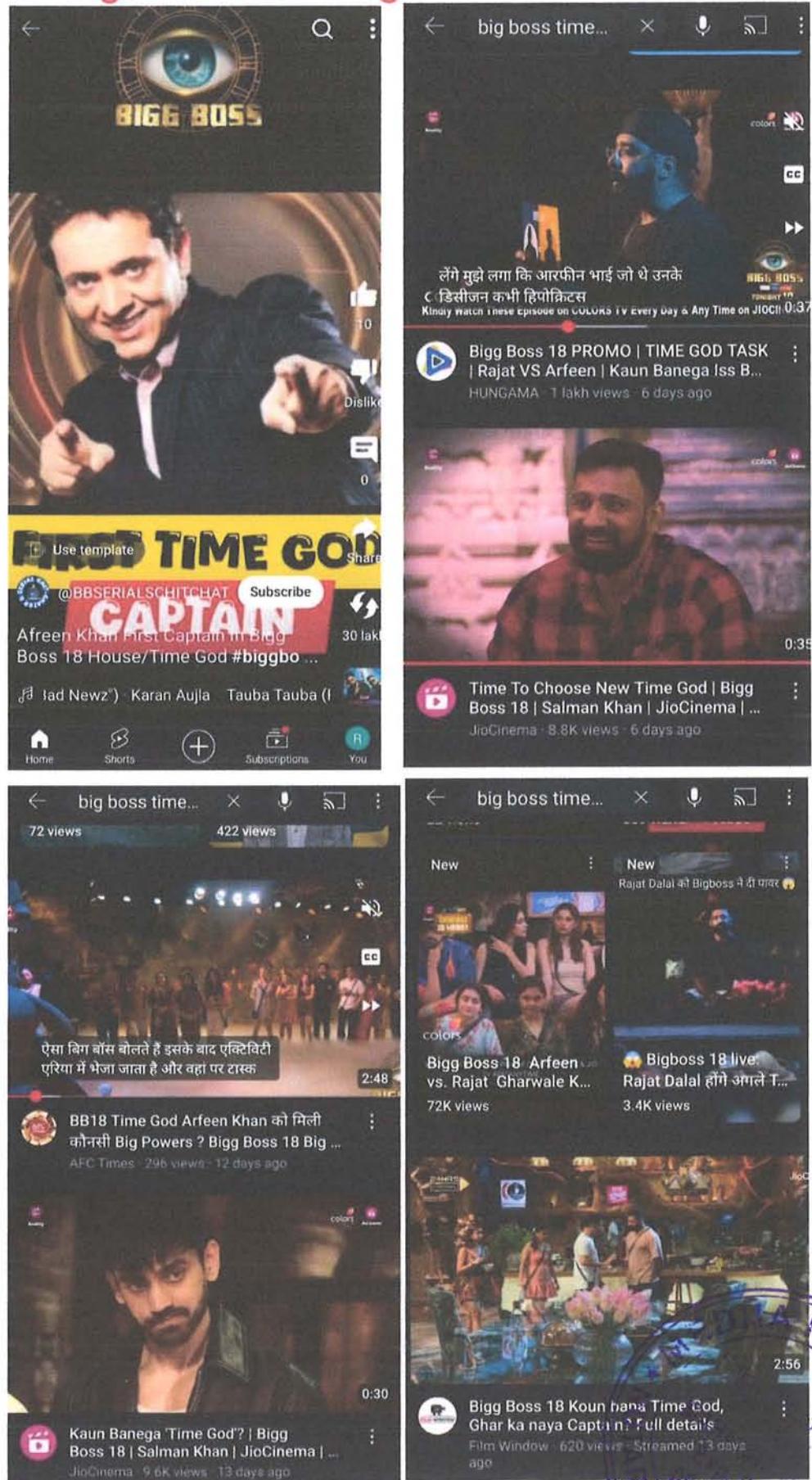
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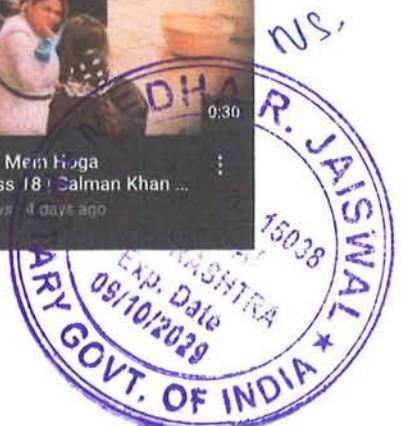
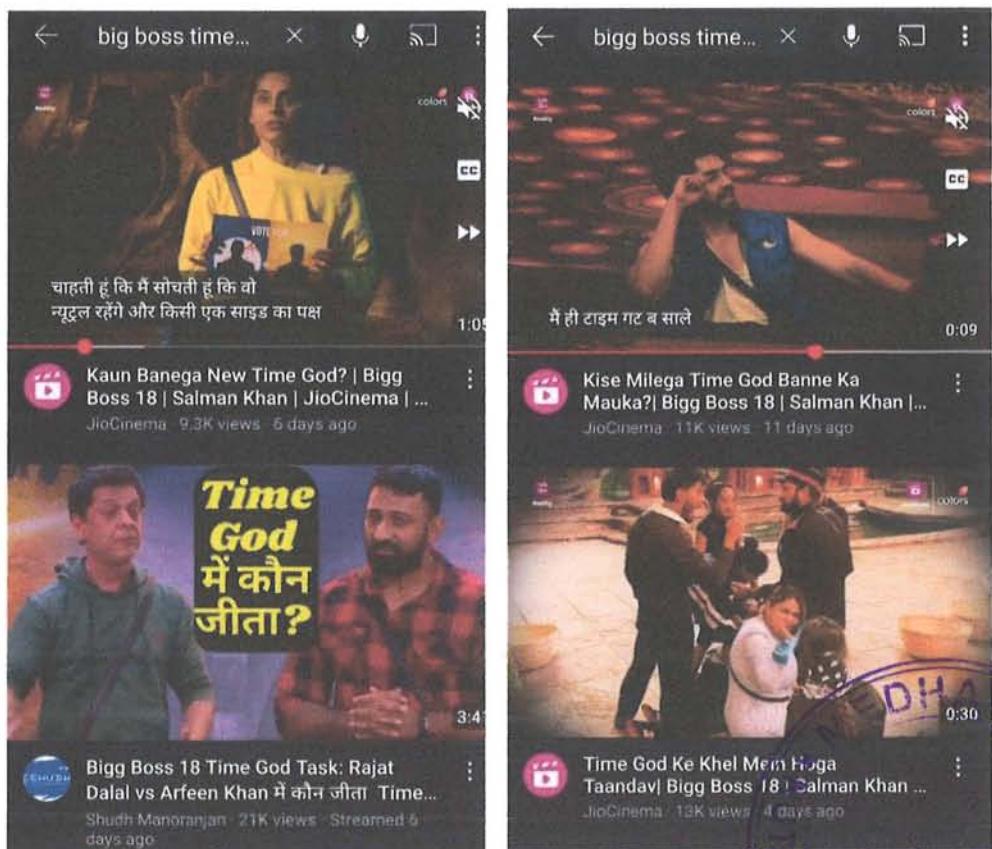
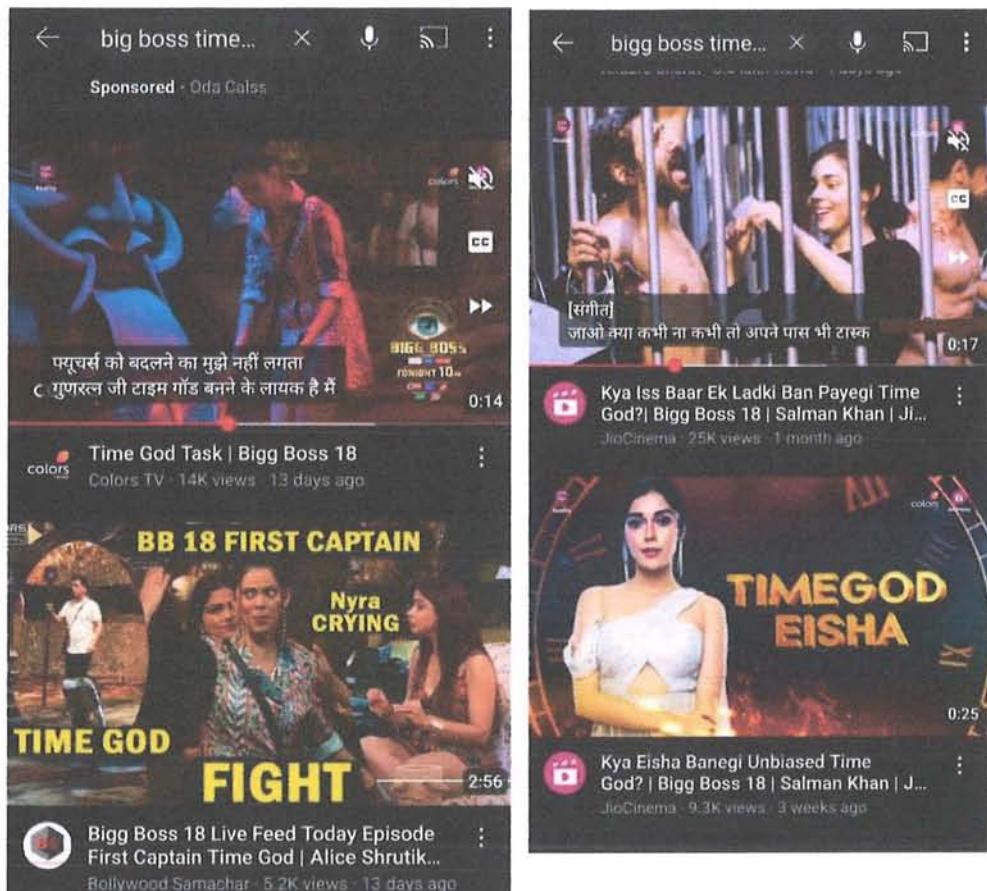
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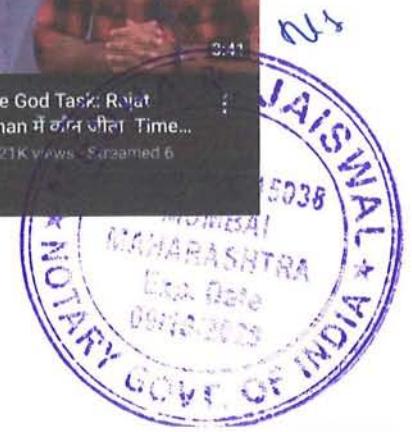
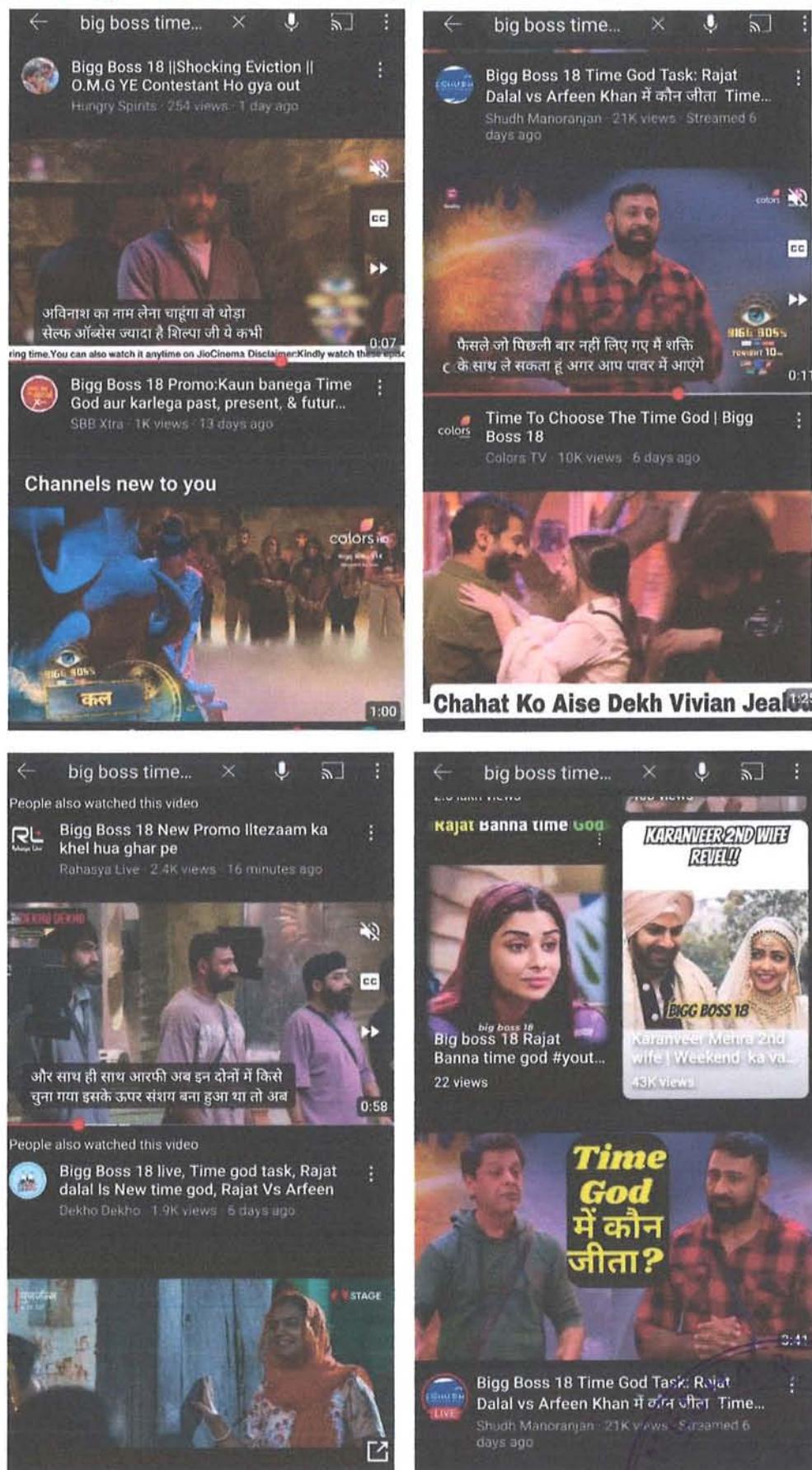
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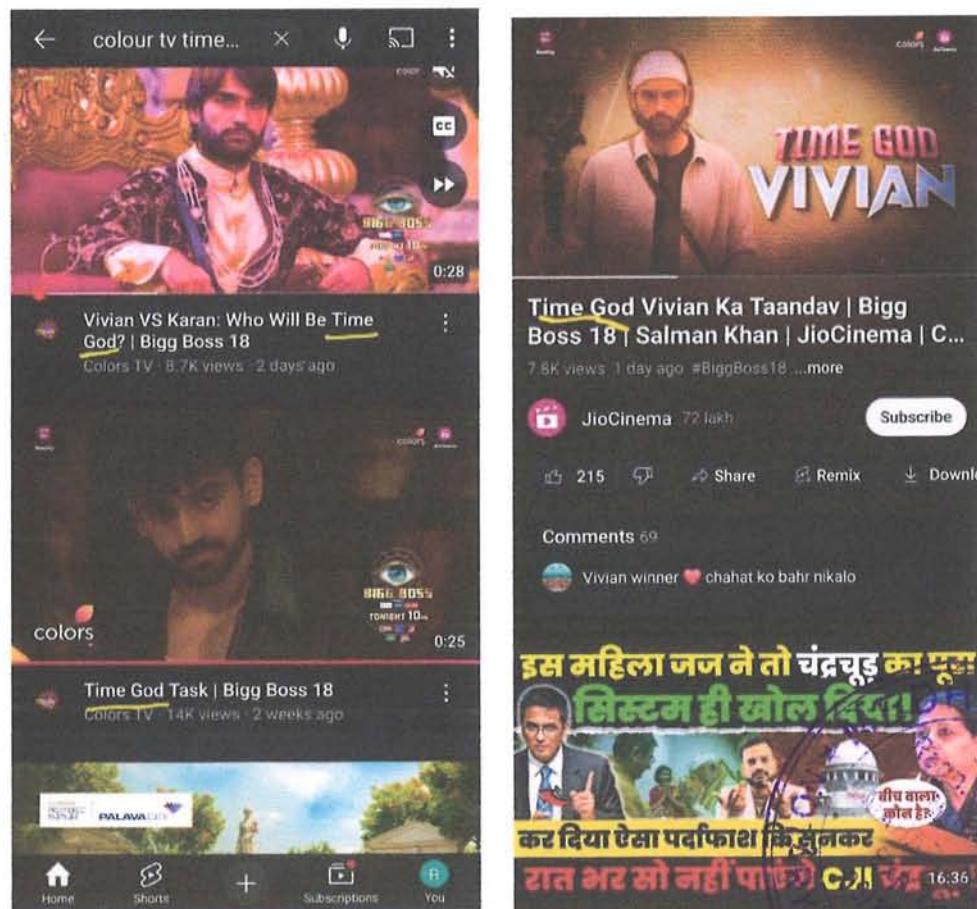
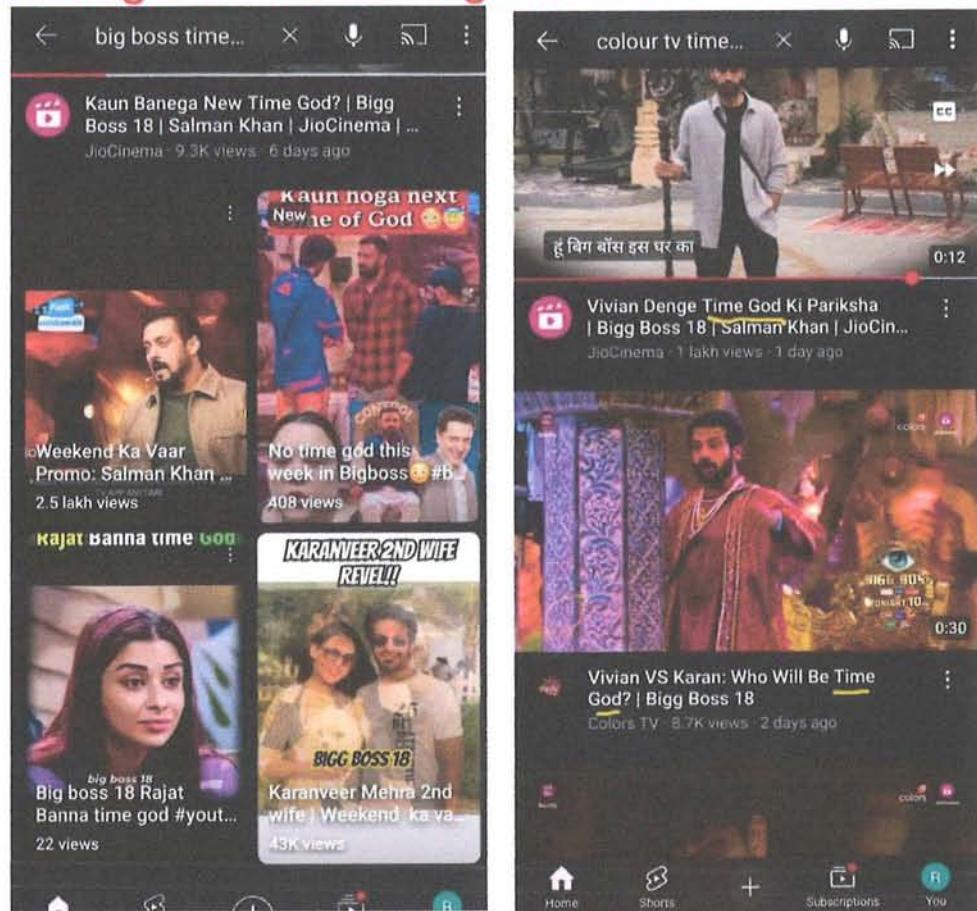
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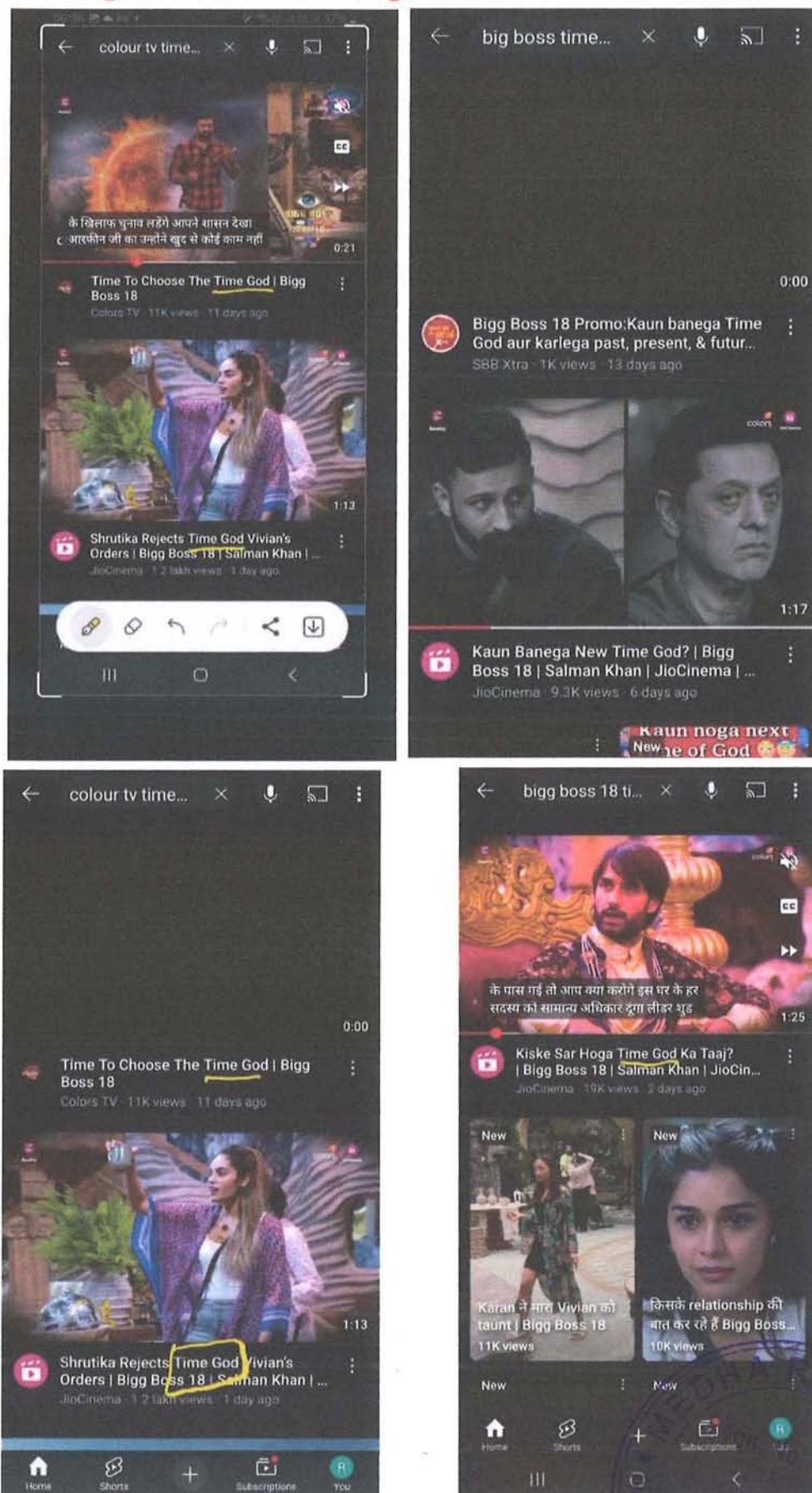
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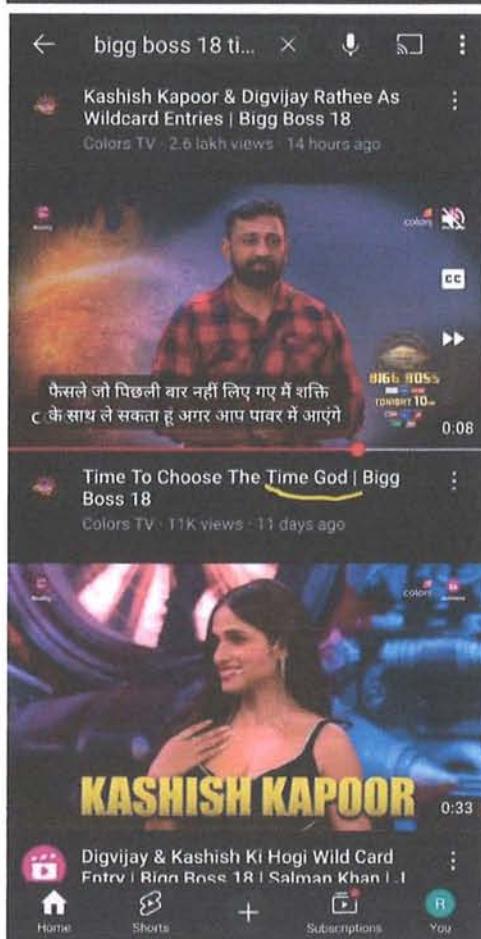
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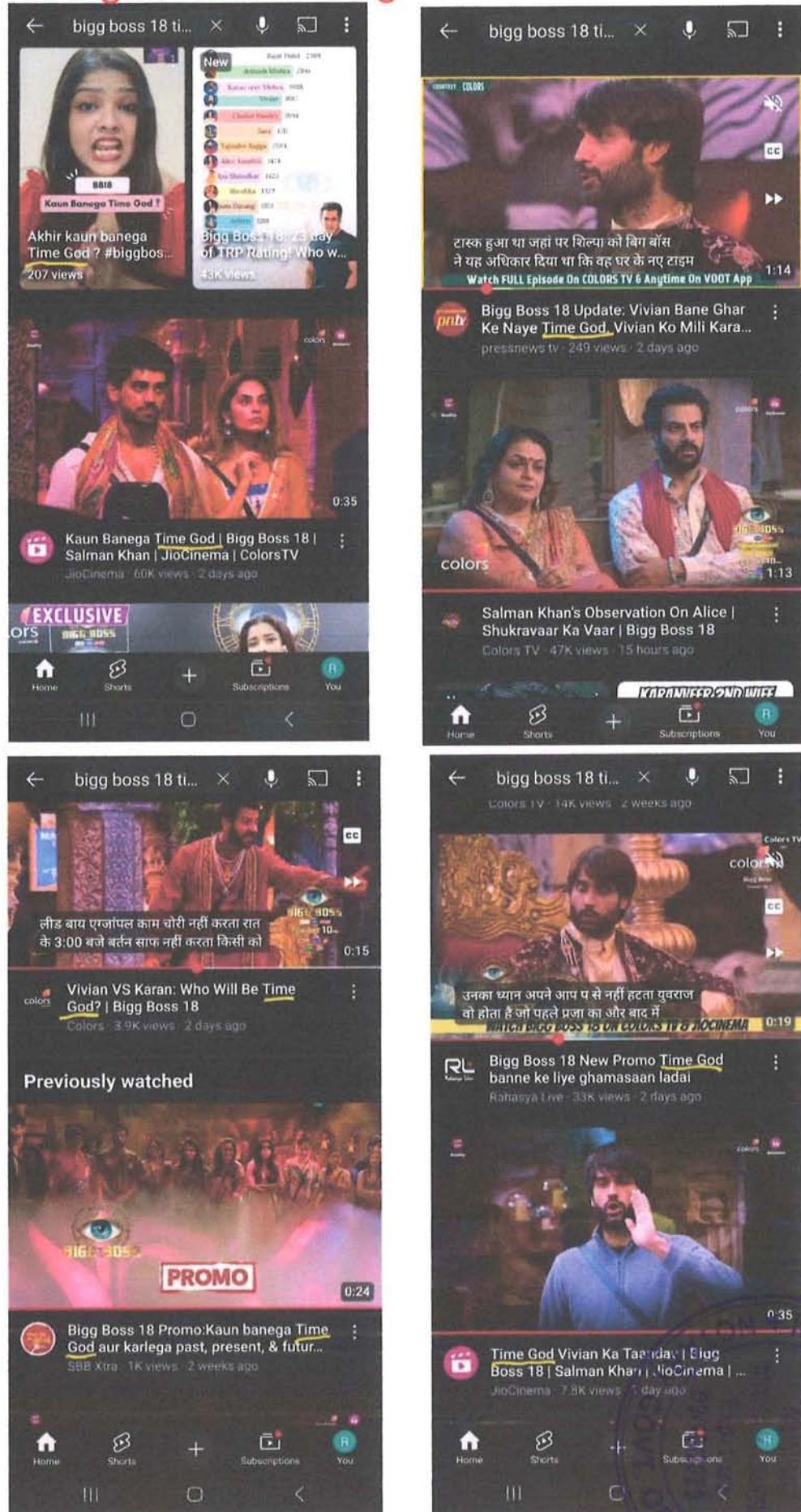
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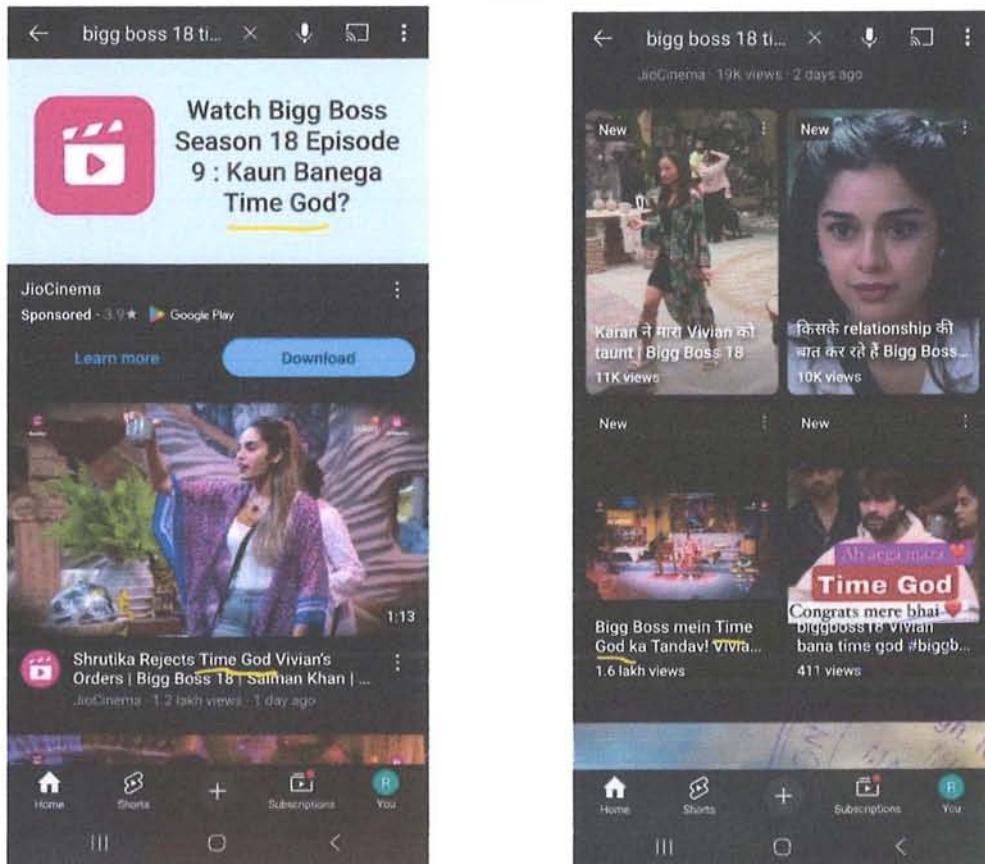
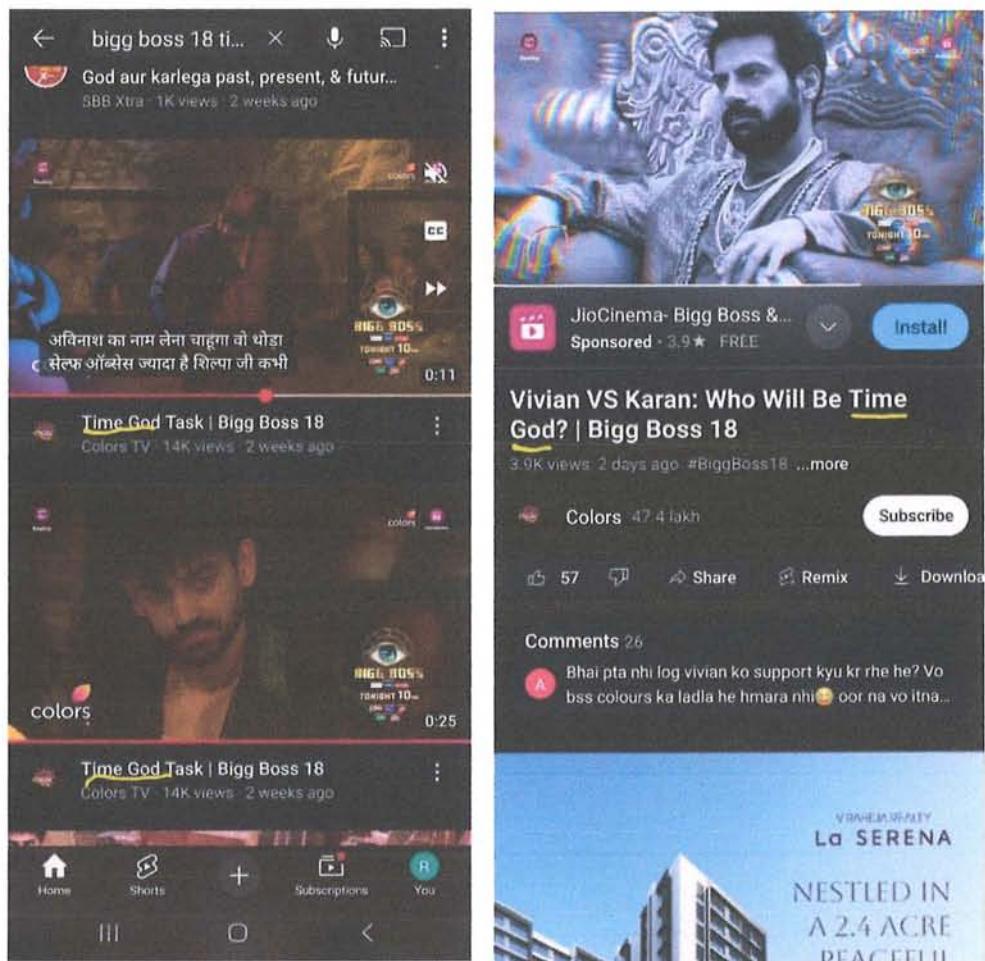
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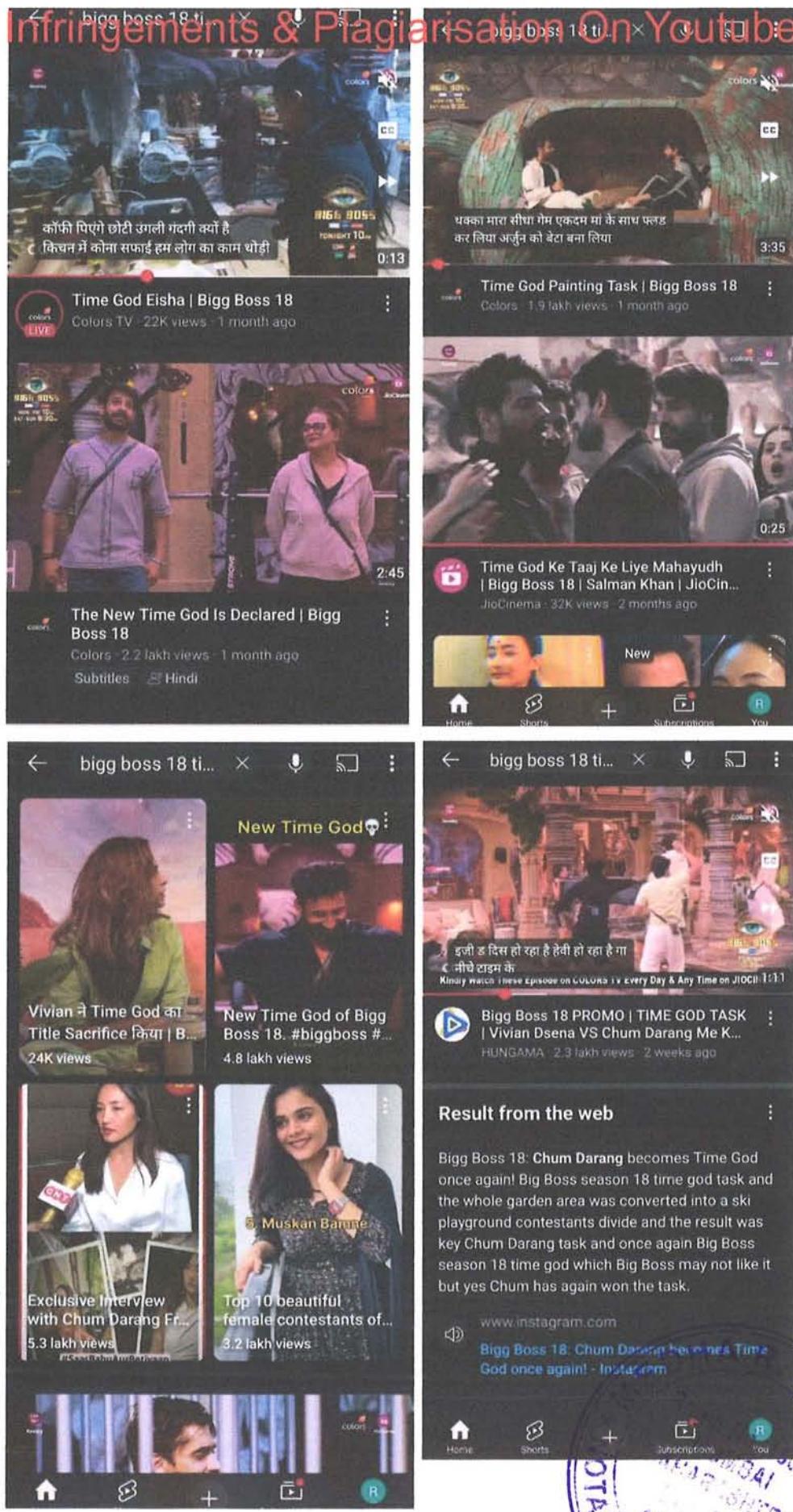
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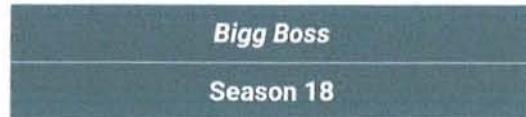
BIGG BOSS 18 INFRINGEMENTS OF TIME GOD KA TANDAV SINCE 6 OCTOBER 2024 ONWARDS

21

22

15:45 🔍 🌐 47% •

X ⚓ ⚓ Bigg Boss (Hindi TV serie... en.wikipedia.org



Bigg Boss Season 18

Presented by Salman Khan

No. of days 107

No. of housemates 23

Winner Karan Veer Mehra

Runner-up Vivian Dsena

No. of episodes 106

Release

Original network Colors TV

Original release 6 October 2024 –
19 January 2025

Season chronology

Previous

Season 17

✓ Production

✓ Housemates status

✓ Housemates

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X ⚓ ⚓ Bigg Boss (Hindi TV serie... en.wikipedia.org

≡ WIKIPEDIA



Bigg Boss (Hindi TV series) season 18

Article Talk

文 A



Bigg Boss 18 also known as *Bigg Boss: Time Ka Tandav* was the eighteenth season of the Indian Hindi-language reality show *Bigg Boss*.^[1] It premiered on 6 October 2024 on *Colors TV* and *JioCinema*.^[2] Salman Khan hosted the show for the fifteenth time.^{[3][4]} The grand finale of the season took place on 19 January 2025, where *Karan Veer Mehra* emerged as the winner, while *Vivian Dsena* was the runner-up.^[5]



Bigg Boss Season 18

Presented by Salman Khan

No. of days 107

No. of housemates 23

Winner Karan Veer Mehra





IN THE HIGH COURT OF JUDICATURE AT BOMBAY
 JURINARY ORIGINAL CIVIL JURISDICTION IN ITS
 COMMERCIAL DIVISION
 COMMERCIAL IP SUIT NO. OF 2025
 SUIT FOR INFRINGEMENT OF COPYRIGHT AND PASSING OFF OF
 (COPYRIGHT)

In The Matter Of:

Mr. Naresh Soni

.....Plaintiff

Vs

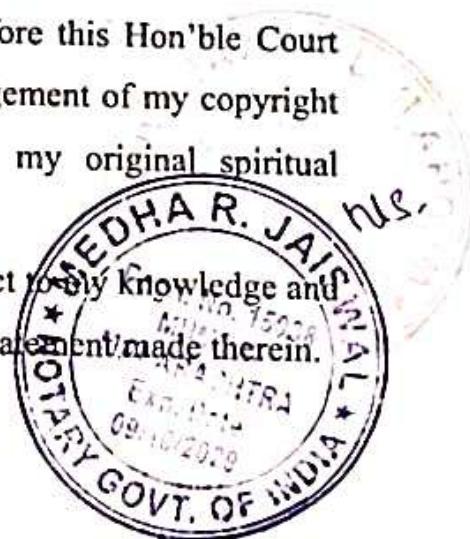
Mr. Atul Kapoor and Anr.

.....Defendants

AFFIDAVIT IN SUPPORT OF THE PLAINT

I, Naresh Soni, an adult, aged about 68 years, residing at A 402 Keshav Mansion, Evershine Nagar, Malad, West Mumbai 400064, India. do hereby solemnly affirm and state as under:

1. That I am the Plaintiff in the above-mentioned Suit and am well acquainted with the facts and circumstances of the present case. I am competent to depose to this affidavit.
2. That I have filed the accompanying Plaintiff before this Hon'ble Court seeking relief against the Defendants for infringement of my copyright and moral rights, particularly in relation to my original spiritual expression titled "TIMEGOD".
3. That the contents of the Plaintiff are true and correct to my knowledge and belief and I confirm and affirm each and every statement made therein.



4. That the cause of action first arose on **23rd October 2024**, when I issued a legal notice to the Defendants regarding unauthorized use of my copyrighted material.
5. That I had earlier filed a suit on the same cause of action, which was **later withdrawn on 25th April 2025** with liberty to file afresh.
6. That due to the preparation of documents, consultations, and other bonafide reasons, there has been a delay in re-filing the suit. Accordingly, I have preferred a separate application seeking **condonation of delay**, which forms part of the present filing.
7. That the delay is neither deliberate nor mala fide but due to genuine and unavoidable circumstances. I request this Hon'ble Court to be pleased to condone the said delay in the interest of justice.
8. That I have not suppressed any material fact nor misrepresented any information in the accompanying Plaintiff.
9. That the contents of the Plaintiff be treated as part and parcel of this affidavit as if specifically reproduced herein for the sake of brevity.
10. That I am making this affidavit in good faith and in the interest of justice.

Solemnly Affirmed at Mumbai)

This 28th day of July 2025)

Moreesh Son

Plaintiff

Sresta T

Advocate for Plaintiff



VERIFICATION

I, the above-named deponent, **Naresh Soni**, do hereby verify that the contents of the above affidavit are true and correct to my knowledge and belief. No part of it is false and nothing material has been concealed therefrom.

Solemnly Affirmed at Mumbai)
This 28 day of July 2025)

Naresh Soni

Plaintiff



BEFORE ME
Medha R. Jaiswal
MEDHA R. JAISWAL
 Regn. No. 15038 B.L.S., LL.M
 NOTARY GOVT OF INDIA
 B/6-2, Navy Colony, Near Liberty Garden
 Malad (W), Mumbai 400 064

NOTED & REGISTERED
 Sr. No. 494 Pg. No 58
 Dated: 28/7/25

