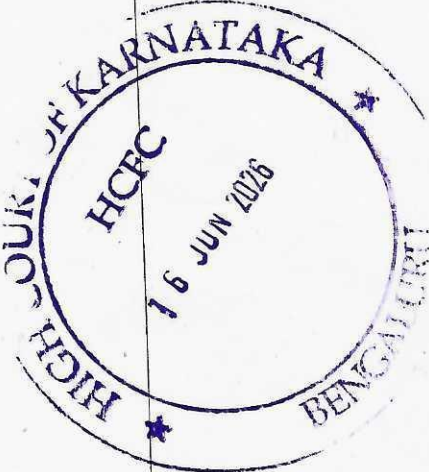


**IN THE HIGH COURT OF KARNATAKA AT BENGALURU
PRESENTATION FORM**

MFA No. /2026	
ADVOCATES, PRATHAM N, ALOK G S & VIVEK G B. DHEE INC., ADVOCATES & SOLICITORS, #401 (south wing), Brigade Plaza, Anandh Rao Circe, Bangalore 560 009.	MR. DARSHAN SRINIVAS & ANR AND SIRI PRODUCTIONS & ORS

DESCRIPTION OF PAPER PRESENTED	COURT FEE AFFIXED ON THE PAPER
1. On the Memo of MFA 2. On the Memo of Appeal 3. On Vakalath 4. On certified Copies 5. On I.A. No. ____/2025 6. On Process Fee 7. On Copy Application 8. _____ 9. _____ 10. _____	

Number of Copies Furnished Presented by: Advocate for Petitioner/ Appellant / Respondent	Other side served Received paper as above
---	--

Advocate's Clerk

Receiving Clerk

PLACE: BENGALURU

DATE:

IN THE HIGH COURT OF KARNATAKA AT BENGALURU

MFA No. /2026

BETWEEN

MR. DARSHAN SRINIVAS & ANR

...APPELLANTS

AND

SIRI PRODUCTIONS & Ors

...RESPONDENTS

INDEX

Sl. No	PARTICULARS	PAGE Nos.
1.	Synopsis & List of Dates and Events	1-5
2.	Memorandum of Miscellaneous First Appeal under Section 104 r/w Order XLIII Rule 1(r) CPC with Verification	6-31
3.	ANNEXURE A: Certified Copy of the Impugned Order dated 02.06.2026 passed in I.A. No.1 in O.S. No.2151/2026 by the XVII Addl. City Civil & Sessions Judge, Bengaluru (CCH-16)	32-48
4.	ANNEXURE B: Copy of the Plaint in O.S. No.2151/2026 a/w copy of I.A. No.1 with affidavit in O.S. No.2151/2026	49-190
5.	ANNEXURE C: Copy of the written statement / statement of objections filed by Respondents No.1 and 2 before the Trial Court <i>Alw MEMO for Adoption of W.S.</i>	191-217
6.	ANNEXURE D: Copy of the order dated 30.04.2026 in W.P. No.7473/2026 (NC: 2026:KHC:24468) of the High Court of Karnataka	218-238
7.	ANNEXURE E: Copy of CBFC Certificate No. DIL/7/33/2026-BAN dated 17.03.2026	239-241
8.	ANNEXURE F: Copy of the written arguments filed by the Appellant before the Trial Court.	242-254
9.	ANNEXURE G: Copy of the written arguments filed by the Respondent No.1 before the Trial Court	255-279
10	Valuation slip	280-281
11	Vakalatnama	282

12

I.A. No. ____/2026 -- Application under Order
XXXIX Rule 1 & 2 r/w Section 151 CPC for stay of
the Impugned Order, with supporting Affidavit

283-298

Place: Bengaluru
Date: 16.06.2026


ADVOCATE FOR APPELLANTS

IN THE HIGH COURT OF KARNATAKA AT BENGALURU

MFA No. /2026

BETWEEN

MR. DARSHAN SRINIVAS & ANR

...APPELLANTS

AND

SIRI PRODUCTIONS & Ors

....RESPONDENTS

SYNOPSIS

Date	Event / Particulars
09.06.2024	Crime No. 0250/2024 registered by Kamakshipalya Police Station, Bengaluru, under Sections 302 and 201 IPC against Appellant No.1 (arrayed as Accused No.2) and others, in connection with the alleged murder of Sri. Renukaswamy, a fan of Appellant No.1 who had allegedly sent objectionable messages to Appellant No.2.
June 2024	Appellant No.1 arrested by the Kamakshipalya Police and taken into custody. He has remained an undertrial prisoner since.
19.06.2024	Ad-interim restraint granted in O.S. No.4267/2024 (City Civil Court, Bengaluru) against publication of unauthenticated / defamatory content relating to the personal or family life of Appellant No.1, or the investigation in Crime No.0250/2024.
27.08.2024	Ex-parte ad-interim temporary injunction granted in O.S. No.6082/2024 (City Civil & Sessions Court, Bengaluru) restraining airing / printing / publishing of statements on the investigation, charge sheet, FSL reports, confessional statements, and debates on the final report in FIR No.0250/2024.
10.09.2024	Interim order in W.P. No.24836/2024 (High Court of Karnataka) restraining dissemination of charge-sheet material; Ministry of I&B directed to act upon violations of the Cable Television Network Rules, 1994.
11.11.2024	Ad-interim injunction granted in O.S. No.7875/2024 (City Civil Court, Bengaluru) restraining unverified statements lowering the image of Appellant No.1 in print / TV / internet / social media.
(Around 2024-2026)	Charge sheet filed; matter committed and registered as C.C. No.1319/2024 before the LVI Additional City Civil and Sessions Judge, Bengaluru. Day-to-day trial commenced and remains ongoing at a nascent stage.
16.01.2026	Appellant No.1 lodged complaint with the Ministry of I&B / MEITY regarding violations of the Programme Code by

	various media channels (subject matter of W.P. No.7473/2026).
09.03.2026	Respondents No.1 and 2 released the teaser of the feature film "BOSS" on YouTube, X/Twitter, and Facebook, bearing the explicit "Inspired by True Events" declaration in its opening frame and replicating 13 factual parallels to C.C. No.1319/2024. Press meet conducted thereafter.
12.03.2026	Appellants caused a statutory notice to be issued to the Regional Officer of the CBFC (Respondent No.3) under Section 5B of the Cinematograph Act, 1952, calling upon the CBFC to refuse certification of the film.
17.03.2026	Despite the statutory notice and five subsisting protective orders, the CBFC granted Certificate No. DIL/7/33/2026-BAN to the film "BOSS" — within five days of the notice and eight days of the teaser — on the basis of a plot summary falsely describing the protagonist as a "famous cricket player."
27.03.2026	Appellants instituted O.S. No.2151/2026 before the XVII Addl. City Civil & Sessions Judge, Bengaluru (CCH-16). On the same day, the Trial Court granted a comprehensive ex-parte ad-interim injunction under Order XXXIX Rules 1 & 2 r/w Section 151 CPC restraining Respondents No.1 and 2 from producing, releasing, exhibiting, streaming or dealing with the film "BOSS" in any medium. Return date fixed as 02.05.2026.
(After 27.03.2026)	Respondents No.1 and 2 continued promotion of the film on digital platforms in defiance of the injunction. Before receipt of summons, they moved an advancement application and filed their written statement, adopted as statement of objections to I.A. No.1.
30.04.2026	This Hon'ble Court (per the Hon'ble Mr. Justice Sachin Shankar Magadam) allowed W.P. No.7473/2026 (NC: 2026:KHC:24468) in part, directing the Ministry of I&B and MEITY to examine the impugned broadcasts and take action under Sections 19 and 20 of the Cable Television Networks (Regulation) Act, 1995; holding such conduct to constitute prima facie contempt of court; with liberty reserved to initiate contempt proceedings.
02.06.2026	The Ld. Trial Court (Smt. M. Anitha, XVII Addl. City Civil & Sessions Judge) passed the Impugned Order dismissing I.A. No.1 and vacating the ex-parte ad-interim injunction of 27.03.2026, holding all three limbs of the tripartite test against the Appellants.
14.06.2026	Certified copy of the Impugned Order obtained; the present Miscellaneous First Appeal under Section 104 r/w Order XLIII Rule 1(r) CPC, together with I.A. for stay under Order XLI Rule 5 r/w Section 151 CPC, filed before this Hon'ble Court.

19.06.2026	The date of the proposed release of the movie BOSS in Theatres all around Karnataka.
-------------------	--

CASE IN BRIEF:

1. Nature of the Appeal. This is a Miscellaneous First Appeal under Section 104 read with Order XLIII Rule 1(r) of the Code of Civil Procedure, 1908, assailing the Impugned Order dated 02.06.2026 passed by the XVII Additional City Civil and Sessions Judge, Bengaluru (CCH-16) in I.A. No.1 in O.S. No.2151/2026. By the Impugned Order, the Ld. Trial Court vacated its own comprehensive ex-parte ad-interim injunction dated 27.03.2026 and dismissed the Appellants' application under Order XXXIX Rules 1 & 2 r/w Section 151 CPC, thereby leaving the Appellants without any protection against the imminent release of the feature film "BOSS."

2. The Parties. Appellant No.1, Sri. Darshan Srinivas, is one of the most celebrated actors and producers of the Kannada film industry, universally and exclusively known by the monikers "Challenging Star Darshan," "Boss," and "D Boss." Appellant No.2 is his wife, who represents both Appellants as Appellant No.1 is presently in judicial custody. Respondent No.1 (Siri Productions) is the producer and Respondent No.2 (Sri. Lava V) the director of the impugned film "BOSS." Respondent No.3 is the CBFC; Respondent No.4 is the KFCC; Respondents No.5 to 7 are the digital intermediaries (Facebook, X/Twitter, YouTube); and Respondents No.8 to 12 are media houses and persons.

3. The Sub-Judice Criminal Trial. On 09.06.2024, Crime No. 0250/2024 was registered against Appellant No.1 under Sections 302 and 201 IPC in connection with the alleged murder of one Sri. Renukaswamy, a fan who had allegedly sent obscene messages to Appellant No.2. The prosecution alleges that the victim was abducted, assaulted, and killed, and his body disposed of near a drainage in Kamakshi Palya, Bengaluru, after he pleaded that he had a pregnant wife and aged parents at home. The matter is now registered as C.C. No.1319/2024 before the LVI Additional City Civil and Sessions Judge, Bengaluru, where day-to-day trial is ongoing at a nascent stage. Appellant No.1, an undertrial prisoner, enjoys the full presumption of innocence under Article 21 and has not been convicted of any offence.

4. The Chain of Protective Orders. To insulate the criminal trial from media-driven adjudication, the Appellants secured a continuous chain of protective orders — in O.S. No.4267/2024 (19.06.2024), O.S. No.6082/2024 (27.08.2024), W.P. No.24836/2024 (10.09.2024), O.S. No.7875/2024 (11.11.2024), and most significantly W.P. No.7473/2026 (NC: 2026:KHC:24468) dated 30.04.2026. In the last, this Hon'ble Court (per the Hon'ble Mr. Justice Sachin Shankar Magadum) held that such media conduct amounts to "prima facie contempt of court" and directed the Ministry of I&B and MEITY to take immediate regulatory action under the Cable Television Networks (Regulation) Act, 1995.

5. The Film "BOSS." In knowing defiance of these orders, Respondents No.1 and 2 produced the film "BOSS" and released its teaser on 09.03.2026, bearing the explicit declaration "Inspired by True Events" in its opening frame. The teaser replicates a minimum of thirteen precise factual parallels to the prosecution's case in C.C. No.1319/2024 — including the title/moniker "Boss," the killing of a fan who sent obscene messages to the protagonist's wife, the

victim's verbatim dying plea, the body found near a drainage, the protagonist's wife named "Lakshmi," the Bengaluru setting, and the celebrity's arrest and prosecution. The director publicly admitted that the film draws from real events.

6. The CBFC Certification. Despite a statutory notice issued on 12.03.2026 under Section 5B of the Cinematograph Act, 1952, and despite the five subsisting protective orders, the CBFC granted Certificate No. DIL/7/33/2026-BAN on 17.03.2026 — within five days — on the basis of a plot summary that falsely described the protagonist as a "famous cricket player," a description that finds no reflection whatsoever in the teaser.

7. The 27.03.2026 Injunction and Its Vacation. On 27.03.2026, the Ld. Trial Court, after recording a prima facie case, granted a comprehensive ex-parte ad-interim injunction restraining Respondents No.1 and 2 from producing, releasing, exhibiting, streaming or dealing with the film in any medium including theatres and OTT. By the Impugned Order dated 02.06.2026, however, the Ld. Trial Court vacated this injunction, holding all three limbs of the tripartite test against the Appellants, despite no change in material circumstances between the two dates.

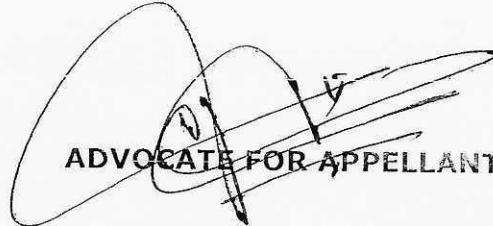
8. Why the Impugned Order Is Perverse. The Impugned Order is vitiated by manifest legal infirmities. The Ld. Trial Court: (i) dismissed the suit as based on "wild guessing/imaginings" while ignoring the audio-visual evidence of thirteen parallels and the "Inspired by True Events" declaration; (ii) accepted, without any independent scrutiny, the Respondents' paper defence that the protagonist was a "cricketer," though the teaser shows no cricket; (iii) erroneously treated CBFC certification as an absolute shield, contrary to *Mushtaq Moosa Tarani v. Government of India* (the "Black Friday" case) which holds that certification does not bar judicial restraint where exhibition would amount to contempt of court; (iv) held that the Appellants' injury could be "suitably compensated," contrary to *Bloomberg Television v. Zee Entertainment* (2024 SCC OnLine SC 426) which holds that fundamental rights cannot always be compensated monetarily; and (v) wholly failed to apply or distinguish the binding order of this Hon'ble Court in *W.P. No.7473/2026*, rendered barely thirty-three days earlier, which had declared the very same species of conduct to constitute prima facie contempt of court.

9. The Constitutional Question. The Appeal raises a fundamental constitutional question: whether a civil court can permit the commercial release of a feature film that dramatises, as "true," the prosecution's version in a live and ongoing murder trial, thereby elevating the producer's commercial interest under Article 19(1)(a) above the accused's non-derogable right to a fair trial under Article 21. The Constitution Bench in *Sahara India Real Estate Corpn. Ltd. v. SEBI* (2012) 10 SCC 603 has affirmed that courts possess inherent jurisdiction to pass postponement orders to prevent a "real and substantial risk of prejudice" to the administration of justice. The Supreme Court in *M.P. Lohia and Manu Sharma* has consistently deprecated "trial by media." A full-length feature film is, a fortiori, far more prejudicial than a news report.

10. Irreparable Injury and Relief Sought. Once the film is exhibited — even for a single day in theatres or on an OTT platform — the contamination of the evidentiary matrix, the erosion of the presumption of innocence, and the destruction of the Appellants' reputation will be complete and incapable

of being undone. Financial loss to the Respondents, by contrast, is quantifiable and compensable; and in any event their investment was made in mala fide defiance of subsisting court orders. The Appellants therefore pray that this Hon'ble Court be pleased to set aside and quash the Impugned Order dated 02.06.2026, restore and continue the ex-parte ad-interim injunction dated 27.03.2026, and grant an immediate ad-interim stay restraining the release of the film "BOSS" in any medium pending the hearing and disposal of this Appeal. Hence this Appeal.

Place: Bengaluru
Date: 16.06.2026



ADVOCATE FOR APPELLANTS

IN THE HIGH COURT OF KARNATAKA AT BENGALURU
MFA No. _____ OF 2026 (CPC)

Arising out of the Impugned Order dated 02.06.2026 in O.S. No. 2151/2026 passed by the XVII Additional City Civil and Sessions Judge, Bengaluru (CCH-16)

RANK OF THE PARTIES
IN TRIAL COURT II IN HIGH COURT

B E T W E E N

- 1. SRI. DARSHAN SRINIVAS,**
Aged 47 years, S/o Late Thoogudeepa Srinivas,
#217, Thoogu Deepa Nilaya, F-Road,
Ideal Home Township,
Rajarajeshwari Nagar, Bengaluru,
Karnataka - 560 098.
- 2. SMT. VIJAYALAKSHMI DARSHAN,**
Aged 43 years, W/o Darshan Srinivas,
#217, Thoogu Deepa Nilaya, F-Road,
Ideal Home Township,
Rajarajeshwari Nagar, Bengaluru,
Karnataka - 560 098.

...PLAINTIFFS/APPELLANTS

AND

RESPONDENTS:

- 1. SIRI PRODUCTIONS**
(Proprietorship Concern),
Represented by its Proprietor/Producer
Sri. Tanush S,
No.131, Sri Ranganatha Nilaya,
Dasanapura, Tumkur Road, Bengaluru -
562 162.
- 2. SRI. LAVA V**
Director,
No.131, Sri Ranganatha Nilaya,
Dasanapura, Tumkur Road, Bengaluru -
562 162.
- 3. CENTRAL BOARD OF FILM**
CERTIFICATION (CBFC),
(Union of India), Through its Regional
Officer, Shri Yashwant Shehnai,
Kendriya Sadan, 'D' Wing, 4th Floor, 17th
Main, Koramangala, Bengaluru - 560
034.
- 4. KARNATAKA FILM CHAMBER OF**
COMMERCE (KFCC),
Through its President, Sri. Jayapradha,



28, 1st Main Road, Crescent Road, High
Grounds, Bengaluru – 560 001.

**5. META PLATFORMS, INC.
(FACEBOOK),**

Through its Authorized
Signatory/Grievance Officer,
India Office: 15th Floor, World Trade
Center, Brigade Gateway, Malleshwaram
West, Bengaluru – 560 055.

6. X CORP (formerly Twitter),

Through its Authorized
Signatory/Grievance Officer,
India Office: 9th Floor, World Trade
Center, Brigade Gateway, Malleshwaram
West, Bengaluru – 560 055.

7. GOOGLE LLC (YOUTUBE),

Through its Resident Grievance Officer
for YouTube, Suraj Rao,
Unit No.26, The Executive Centre, Level
8, DLF Centre, Sansad Marg, Connaught
Place, New Delhi – 110 001

8. NEW INDIAN EXPRESS,

Registered Corporate Office: Express
Garden, 29, 2nd Main Road, Ambattur
Industrial Area, Chennai – 600 058.
Bengaluru Office: No.1, Express Building,
Queens Road, Bengaluru – 560 001.
Represented by its Editor.

**9. FILMIBEAT (Greynium Information
Technologies Pvt. Ltd.),**

VRR Legacy No.2, 1st Main, 4th Floor, 1st
Block Koramangala, Jakkasandra
Extension, Bengaluru – 560 034.

10. TV9 KANNADA,

TV9 Karnataka Pvt Ltd
13/1 Rhenius Street,
Richmond Town,
Bengaluru 560 025

11. ZEE KANNADA NEWS,

5th floor, the Land Mark Buidling,
Next to Trinity Metro Station,
MG Road, Yellappa Chetty Layout,
Bengaluru 560 042

12. SRI. ASHOK KUMAR,

DEFENDANTS/RESPONDENTS

RESPONDENTS



**MEMORANDUM OF MISCELLANEOUS FIRST APPEAL UNDER SECTION
104 READ WITH ORDER XLIII RULE 1(R) OF THE CODE OF CIVIL
PROCEDURE, 1908**

The Appellants begs to submit as under:

- I. The address for service of the Appellants and their Counsel is as set out in the cause title above. The addresses for service of the Respondents are as set out in the cause title above.
- II. It is submitted that the address of the Petitioner for the purpose of issuing of summons, notice, etc., from this Hon'ble Court is as stated in the cause title. They may also be served through his Counsel, Pratham N, Alok GS & Vivek GB @ DHEE Inc, Advocates & Solicitors, 401 (south), Brigade Plaza, 4th floor, Anandh Rao Circle, Bengaluru 560 009, Email:prathamn15@gmail.com, Ph:+91 8397056064.
- III. The Appellants are aggrieved by the Impugned Order dated 02.06.2026 passed in I.A. No.1 in O.S. No.2151/2026 by the Learned XVII Additional City Civil and Sessions Judge, Bengaluru (CCH-16) (hereinafter referred to as 'the Ld. Trial Court'), whereby the Ld. Trial Court dismissed I.A. No.1 and vacated the comprehensive ex-parte ad-interim injunction earlier granted on 27.03.2026. The Certified Copy of the Impugned Order is produced herewith and marked as ANNEXURE-A.
- IV. The Appellants have not filed any other appeal or petition in respect of the subject matter of this appeal, and no such appeal or petition is pending before this Hon'ble Court or any other Court.

FACTS IN BRIEF:

1. Appellant No.1 is one of the most celebrated and commercially successful actors and film producers in the South Indian film industry, specifically the Kannada film industry (Sandalwood). Over a career spanning more than two decades, he has delivered a string of blockbuster Kannada films, earning him an unparalleled fan following that cuts across age, region, and social strata in Karnataka and beyond. He is universally known, addressed, and identified by his distinctive monikers "Challenging Star Darshan," "Boss," and "D Boss" — the last



of which has become so uniquely and exclusively identified with him that the general public, the media, the Karnataka film industry, and the courts themselves use it interchangeably with his name. Appellant No.2, Smt. Vijayalakshmi Darshan, is the legally wedded wife of Appellant No.1.

3. Appellant No.1 has, over the course of his career, acted in and produced a film itself titled "Boss" — further cementing the commercial, cultural, and reputational identity of the title 'Boss' as being uniquely and inseparably associated with his persona. The moniker 'D Boss' was conferred upon him by his fans as a mark of reverence and has been consistently used in media publications, social media, fan clubs, and public discourse for well over a decade. This distinctive persona and trade identity is a valuable property right as recognised by courts across India.
4. On 09.06.2024, Crime No. 0250/2024 was registered by the Kamakshipalya Police Station, Bengaluru, for offences punishable under Sections 302 and 201 of the Indian Penal Code, 1860, against Appellant No.1 (arrayed as Accused No.2) and others, in connection with the alleged murder of one Sri. Renukaswamy, a fan of Appellant No.1.
5. The prosecution's case, as set out in the FIR and the charge sheet, is that Sri. Renukaswamy had allegedly sent obscene, offensive, and objectionable messages to Appellant No.2. It is alleged that upon the instigation of Appellant No.1, Sri. Renukaswamy was abducted, assaulted, and killed, and that his body was disposed of near a drainage in the area of Kamakshi Palya, Bengaluru. It is further alleged in the prosecution's account that Sri. Renukaswamy pleaded for his life stating words to the effect that he had a pregnant wife and aged parents at home.
6. Following investigation, a charge sheet was filed and the case is now registered as S.C. No.1319/2024 before the LVI Additional City Civil and Sessions Judge, Bengaluru. The trial is currently at a nascent stage, with day-to-day hearing ongoing. Appellant No.1 is an undertrial prisoner. The presumption of innocence — a fundamental right under Article 21 as recognised in a catena of Supreme Court decisions — operates fully in his favour. He has not been convicted of any offence.



7. It is in this charged and highly publicised context that Respondents No.1 and 2, choosing to capitalise on the public sensationalism surrounding the sub-judice proceedings, embarked upon the production of the feature film titled "BOSS."

The History of Media Exploitation and the Protective Orders

8. From the very date of registration of Crime No.0250/2024, the print media, television channels, and digital/social media platforms have been engaged in what this Hon'ble Court has itself recently described in W.P. No.7473/2026 (NC: 2026: KHC:24468) between Appellant No. herein and UOI (ministry of telecommunications & broadcasting) as:

"a calculated media-driven adjudication, fostering a parallel narrative and engendering prejudicial pre-trial publicity" – disseminating speculative narratives, selectively leaked charge sheet material, and unverified allegations, thereby engineering public perception and impairing the Appellants' right to a fair trial."

9. In order to protect the integrity of the ongoing criminal trial and to safeguard their fundamental rights, the Appellants have secured a continuous chain of protective orders from Civil Courts and this Hon'ble Court, as tabulated below:

Case No.	Forum	Date	Relief Granted
O.S. No. 4267/2024	City Civil Court, Bengaluru	19.06.2024	Ad-interim restraint against publication of unauthenticated and defamatory content in relation to the personal or family life of Appellant No.1, or the investigation in Crime No.0250/2024.
O.S. No. 6082/2024	City Civil & Sessions Court, Bengaluru	27.08.2024	Ex-parte ad-interim TI restraining defendants from airing/printing/publishing statements on investigation, charge sheet, FSL reports, confessional statements, and debates on the final report in FIR No.0250/2024.
W.P. No. 24836/2024	High Court of Karnataka	10.09.2024	Respondents 3 to 40 restrained from disseminating charge sheet material. Ministry of I&B directed to act upon

			Programme Code violations (Cable Television Network Rules, 1994).
O.S. No. 7875/2024	City Civil Court, Bengaluru	11.11.2024	Ad-interim injunction restraining unverified statements lowering the image of Appellant No.1 in print/TV/internet/social media, and dissemination of certified copies/extracts of court records.
O.S. No. 2151/2026	XVII Addl. City Civil & Sessions Judge (CCH-16), Bengaluru	27.03.2026	Comprehensive ex-parte ad-interim injunction restraining Respondents No.1 and 2, their producers, directors, agents and all persons claiming through them, from in any manner producing, filming, editing, promoting, marketing, releasing, distributing, exhibiting, telecasting, streaming, selling, licensing, leasing or dealing with the film 'BOSS' or any content based on the Appellants' life, the pending criminal proceedings, or their personality rights, in any medium including theatres and OTT platforms.
W.P. No. 7473/2026 (NC: 2026:KHC:24468)	High Court of Karnataka (Hon'ble Mr. Justice Sachin Shankar Magadum)	30.04.2026	Writ petition allowed in part. Ministry of I&B and MEITY directed to examine impugned broadcasts and take immediate action under Sections 19 and 20 of the Cable Television Networks (Regulation) Act, 1995. Compliance report within 12 weeks. Liberty reserved to initiate contempt proceedings.

10. The order of this Hon'ble Court in W.P. No.7473/2026 (NC: 2026:KHC:24468), pronounced on 30.04.2026 by the Hon'ble Mr. Justice Sachin Shankar Magadum, made the following findings at paragraphs 19 to 21 of the said order:

"This Court cannot but observe that such conduct amounts to a calculated media-driven adjudication, fostering a parallel narrative and engendering prejudicial pre-trial publicity. The continued telecast

of such content, in the teeth of subsisting injunction orders, reflects a blatant disregard for judicial authority... Such broadcasts, which border on trial by headlines, cannot be countenanced in a system governed by the rule of law, particularly when they are aired in willful disobedience of binding injunctions and in a manner that tends to interfere with the administration of justice. The continued broadcast in the teeth of civil court injunctions, orders of this Court and statutory prohibitions amounts to subversion of due process, erosion of adjudicatory neutrality, interference with administration of justice and prima facie contempt of court."

— W.P. No.7473/2026 (NC: 2026:KHC:24468), paragraphs 19–21

11. The same order further held at paragraph 22 thereof that "the material on record unmistakably discloses violations of Rule 6(1)(d), (e), (f) and (i) of the Programme Code under the Cable Television Networks (Regulation) Act, 1995. Such broadcasts are per se illegal and invite regulatory action under Sections 19 and 20 of the Act. The acts further attract the mischief of Section 2(c)(ii) and (iii) of the Contempt of Courts Act, 1971." Therefore, the Appellants have always been diligent in protecting his fundamental right to fair trial by securing the above stated Gag orders against media channels and other individual persons.

The Production of the Film "BOSS"

12. In this factual backdrop — with five protective orders operating in favour of the Appellants including a High Court order — Respondents No.1 and 2 directed & produced the Kannada feature film titled "BOSS" between November, 2024 to September, 2025 which is produced under the banner of Respondent No.1 (Siri Productions) by Sri. Tanush S (who also plays the lead role), and directed by Respondent No.2 (Sri. Lava V) which is totally based on the alleged incident involving the Appellant No.1 & 2 which is subjudice in SC No. 1319/2024 before the LVI Additional City Civil and Sessions Judge, Bengaluru
13. On 09.03.2026, Respondents No.1 and 2 released the teaser of the film on mass digital platforms — YouTube (Respondent No.7), X/Twitter (Respondent No.6), and Facebook (Respondent No.5). The teaser bore, in its very opening frame, the explicit declaration: **"Inspired by True Events."** The teaser was viewed by millions of persons within hours of its

release, creating an immediate and massive public association between the film and the ongoing criminal trial against Appellant No.1.

14. A plain viewing of the teaser — as acknowledged even in the Impugned Order of the Ld. Trial Court itself at paragraph 10 thereof — reveals a minimum of thirteen (13) striking, deliberate, and unmistakable factual parallels to the prosecution's case in S.C. No.1319/2024, as tabulated below:

Sl.	Element in Film "BOSS" (Teaser / Promotions / CBFC Plot Summary)	Corresponding Fact in Sub-Judice Matter (C.C. No.1319/2024 / Crime No.0250/2024)
1	Title of the film: "BOSS"	Appellant No.1 is publicly, universally and exclusively known as "D Boss" / "Challenging Star Darshan". He has acted in a blockbuster Kannada film itself titled "Boss". The moniker is his commercial identity.
2	Protagonist / lead character repeatedly referred to as "Boss" by fans throughout the film	Appellant No.1's fans and the general public refer to him exclusively as "D Boss" or "Boss" — not as a generic title but as a unique identifier specific to him.
3	Celebrity figure accused of being involved in the killing of a fan/follower who sent obscene messages and calls to the protagonist's wife/girlfriend	The deceased, Renukaswamy, was a fan of Appellant No.1, who allegedly sent objectionable and obscene messages to Appellant No.2 (Vijayalakshmi Darshan), the wife of Appellant No.1. This is the precise foundation of Crime No. 0250/2024.
4	Victim heard pleading in the audio: "Don't kill me, I have a pregnant wife at home and aged parents"	Verbatim mirror of the victim Renukaswamy's alleged last words / dying declaration as specifically set out in the FIR and the charge sheet filed in Crime No. 0250/2024. No coincidence can account for this exact replication.
5	The body of the victim is shown discovered next to a drainage pipeline	The body of Renukaswamy was, as per the prosecution case in Crime No.0250/2024, discovered near a drainage in Kamakshi Palya, Bengaluru. The replication is precise.
6	Celebrity protagonist is shown being arrested and subjected to police investigation	Appellant No.1 was arrested by Kamakshipalya Police in June 2024 and has been in custody since. He is currently facing day-to-day trial in C.C. No.1319/2024 before the LVI Additional City Civil and Sessions Judge, Bengaluru.

7	Entire narrative, story, and settings are Bengaluru-centric	Crime No.0250/2024 and the trial in C.C. No.1319/2024 are entirely situated in Bengaluru. The victim was found in Bengaluru; the accused resides in Bengaluru.
8	The protagonist's wife/girlfriend is named "Lakshmi"	Appellant No.2's full legal name is Vijayalakshmi Darshan — "Lakshmi" is the direct, unmistakable reference to Appellant No.2.
9	Explicit opening disclaimer in the very first frame of the teaser: "Inspired by True Events"	This is a direct and deliberate link to the real-life events forming the subject matter of the sub-judice criminal trial C.C. No.1319/2024. The disclaimer operates as a confession of the film's evidentiary foundation.
10	Film carries two prominent female leads in the storyline	Reflects the real-life circumstances involving Appellant No.2 (wife) and the woman to whom obscene messages were sent — mirroring the factual matrix of the charge sheet.
11	CBFC plot summary describes protagonist as a "famous cricket player" — yet the teaser and all promotional material show a celebrity entertainer and no cricket connection is visible in the teaser	This is a calculated misrepresentation by Respondents No.1 and 2 to circumvent Section 5B of the Cinematograph Act, 1952. The CBFC certified based on a false plot summary. The actual teaser bears no cricket content whatsoever.
12	Victim in the film is named "Shiva Swami"	Real victim: Sri. Renukaswamy — the name is superficially altered to evade identification while retaining the critical "Swami" suffix, maintaining the unmistakable resonance.
13	The crime scene in the film is referred to as "Palya"	The actual crime scene: Kamakshi Palya, Bengaluru — the geographic reference is retained verbatim with only the qualifier "Kamakshi" dropped.

15. The cumulative effect of these thirteen parallels — taken together with the 'Inspired by True Events' opening declaration — is that the film constitutes a dramatic, cinematic re-enactment of the prosecution's version in S.C. No.1319/2024, presented to mass audiences as based on truth, while the trial itself is still ongoing and no verdict has been rendered.

16. After the release of the teaser, Respondent No.2 (the director, Sri. Lava V, who also claims to be a practising advocate) conducted a press conference in which he made public admissions confirming that the film

draws from real events involving the Appellants. The copy of videography of the press conference where the Respondent No. 2 admits to the film draws from real events involving the Appellants has been played and produced on record before the Hon'ble Trial Court.

17. The Ld. Trial Court summarily ignored this admission, characterising it as irrelevant. This constitutes a perverse appreciation of evidence, since the director's intent is directly probative of whether the film constitutes an attempt to circumvent the existing protective orders.

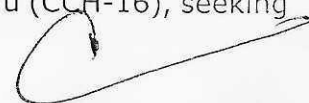
The Statutory Notice to CBFC and the Precipitate Grant of Certification

18. On 12.03.2026 — just three days after the teaser was released — the Appellants, through their Advocates, caused a statutory notice to be issued to the Regional Officer of the CBFC (Respondent No.3) under Section 5B of the Cinematograph Act, 1952, calling upon the CBFC to cease examination of the film and to refuse certification on the grounds that: (a) the film depicted the life of the Appellants and the incidents in S.C. No.1319/2024 without consent; (b) it would interfere with the administration of justice; and (c) it violated the Programme Code and Section 5B guidelines.

19. Despite this statutory notice and the existence of five binding protective court orders — all of which had been brought to the attention of the CBFC — Respondent No.3 granted CBFC Certificate No. DIL/7/33/2026-BAN on 17.03.2026 — a period of merely five days after the receipt of the notice, and only eight days after the teaser was released. The CBFC's certification was based on a plot summary provided by Respondents No.1 and 2, which described the protagonist as a "famous cricket player" — a description that finds no reflection in the teaser, the promotional materials, or any publicly available version of the film. The CBFC failed to apply the mandatory guidelines under Section 5B of the Cinematograph Act, 1952, which require it to refuse certification to films that interfere with the administration of justice.

Institution of O.S. No.2151/2026 and the Ex-Parte Injunction of 27.03.2026

20. On 27.03.2026, the Appellants instituted O.S. No.2151/2026 before the XVII Additional City Civil and Sessions Judge, Bengaluru (CCH-16), seeking



a permanent injunction restraining Respondents No.1 and 2 from in any manner producing, filming, editing, promoting, marketing, releasing, distributing, exhibiting, telecasting, streaming, selling, licensing, leasing, or dealing with the film 'BOSS' or any similar content based on the Appellants' life, the pending criminal proceedings, or their personality rights.

21. On the same day, after recording a prima facie case, the Ld. Trial Court granted a comprehensive ex-parte ad-interim injunction under Order XXXIX Rules 1 & 2 r/w Section 151 CPC. The operative portion of this injunction restrains:

"Respondents No.1 and 2, their producers, directors, representatives, associates, servants, agents, employees, men or anyone claiming through or under them, from in any manner producing, filming, editing, promoting, marketing, releasing, distributing, exhibiting, telecasting, streaming, selling, licensing, leasing, or dealing with the movie titled 'BOSS' (or any other movie/film/web-series/content by whatever name called) based on or depicting the life of the Appellants, the incidents alleged in S.C. No.1319/2024, or any elements directly or indirectly referring to or associating with the Appellants' private life, family, reputation, sub-judice criminal proceedings, and from using the Appellants' name, image, likeness, personality rights, or any promotional material in any medium including Theatres and/or Intermediary Streaming Platforms (OTT) whatsoever."

22. The foundational facts and the constitutional threat that led the Ld. Trial Court to grant this comprehensive, detailed, and protective injunction on 27.03.2026 remained entirely and materially unchanged on 02.06.2026. No new fact emerged; no legal development supervened; no change of circumstances of any kind was demonstrated by the Respondents.

Respondents' Defiance of the Injunction

23. Even after the grant of the ex-parte injunction on 27.03.2026, Respondents No.1 and 2, acting in concert with Respondents No.5 (Facebook), No.6 (X/Twitter), and No.7 (YouTube), continued the promotion and publicity of the film 'BOSS' on digital platforms. Promotional materials — including the teaser, posters, and press meet videos — remained accessible to the public on mass digital platforms throughout the



period from 27.03.2026 to 02.06.2026, constituting a willful and contumacious disregard of the subsisting injunction.

24. Before the receipt of summons and notice, Respondents No.1 and 2 moved an advancement application before the Ld. Trial Court and filed their written statement, which they adopted as their statement of objections to I.A. No.1. The written statement was replete with untenable contentions including: (a) that Appellant No.1 had not signed the plaint; (b) that the protagonist in the film was a 'cricketer' and not a 'celebrity'; (c) that the title 'Boss' was a 'generic term' with no exclusivity; (d) that the CBFC certificate immunized the film from judicial interference; and (e) that the balance of convenience lay in their favour because of heavy financial investment.

The Impugned Order Dated 02.06.2026 and Its Legal Infirmities

25. By the Impugned Order dated 02.06.2026, the Learned XVII Additional City Civil and Sessions Judge dismissed I.A. No.1 and held all three limbs of the injunction tripartite test against the Appellants. The operative findings of the Ld. Trial Court, as extracted from paragraphs 22 to 24 of the Impugned Order, read as follows:

"based only on the teaser of the movie in question, the plaintiffs contend that movie was based on the crime that the plaintiff No.1 is currently under trial for... on this score alone it cannot be decided with any degree of certainty that the matter involved in SC.No.1319/2024 and the one involved in the movie in question are similar... the court cannot sit as a Super Censor Board once the movie has been certified by the statutory authority... it appears that, in the event of granting injunction, hardship is more to the defendants No.1 and 2 rather than the plaintiffs... the balance of convenience tilts in favour of defendants No.1 and 2."

— Paragraphs 22–24 of the Impugned Order dated 02.06.2026

26. The Ld. Trial Court: (i) characterised the Appellants' suit as based on "wild guessing/imaginings"; (ii) accepted without any independent scrutiny the Respondents' paper defence that the protagonist was a 'cricketer' despite the teaser showing none; (iii) held that CBFC certification was dispositive; (iv) weighed the Respondents' commercial investments

against the Appellants' constitutional rights; and (v) held that any injury to the Appellants could be compensated monetarily. Each of these findings is legally untenable, perverse, and contrary to binding authority.

27. The Appellants having no other alternative or efficacious remedy except to challenge the order of the Learned Trial Court before this Hon'ble Court, the present appeal is filed.

GROUND OF APPEAL

GROUND A: PERVERSITY IN APPRECIATION OF THE PRIMA FACIE CASE — FAILURE TO PIERCE THE CINEMATIC CAMOUFLAGE

28. The Ld. Trial Court's finding that the suit rested on 'wild guessing/imaginings' is ex-facie perverse. The Court accepted, without independent scrutiny, the Respondents' paper defence that the protagonist was a 'cricketer' — a defence demolished by the teaser itself, which contains no cricketing content, and by the director's own press conference admissions. The legal test for similarity in cases of this nature — where a film admittedly draws from real events — is not whether there is a character-for-character identity, but whether the substance and overall impression of the film is based on the real events forming the subject matter of the sub-judice proceedings.

29. The Division Bench of the Bombay High Court in **Mushtaq Moosa Tarani v. Government of India** (2005 SCC OnLine Bom 385) (hereinafter "the Black Friday case"), while granting injunction against a CBFC-certified film that carried a disclaimer but was based on events forming the subject matter of a pending criminal trial, held at paragraph 12 of the said judgment as follows:

*"The film is based on the real events which are the subject matter of the pending trial...It is likely to have a prejudicial effect on the fair administration of justice. It prejudices and, in any case, tends to interfere with the due course of judicial proceeding. It also thereby interferes and, in any case, tends to interfere with the administration of justice...**The film may cause prejudice to the accused in the pending trial...amounting to criminal contempt under Section 2(c)(ii) & (iii) of the Contempt of Courts Act.** Cinema is a powerful medium capable of stirring emotions far more deeply than*



news reports, and even a trained judicial mind cannot be presumed completely immune from its influence."

— Mushtaq Moosa Tarani v. Government of India, (2005 SCC OnLine Bom 385), paragraph 12 (Division Bench, Bombay High Court)

30. The present case is on identical facts. The film 'BOSS' bears an explicit 'Inspired by True Events' declaration, uses the moniker 'Boss' which is synonymous with Appellant No.1, and contains thirteen precise factual parallels to the ongoing trial. The ratio in the Black Friday case squarely applies and required the Ld. Trial Court to grant the injunction. The Ld. Trial Court's failure to apply or even acknowledge this binding persuasive precedent — which was placed before it — is a fatal error of judicial discipline.
31. A colourable device designed to circumvent legal restrictions cannot be validated by superficial changes. Calling the protagonist a 'cricketer' on paper while retaining thirteen precise factual parallels to the prosecution's case cannot immunise the film. It is the overall impression and the real-events foundation that determines whether a film relates to pending sub-judice proceedings. The Ld. Trial Court's failure to apply this principle is a ground of perversity.

GROUND B: UNCONSTITUTIONAL ELEVATION OF ARTICLE 19(1)(A) OVER ARTICLE 21 — FAILURE TO APPLY BINDING SUPREME COURT PRECEDENTS

32. The Ld. Trial Court committed a grave constitutional error by treating the Respondents' right to cinematic expression under Article 19(1)(a) as effectively superseding the Appellants' non-derogable right to a fair trial and privacy under Article 21. The Supreme Court's Constitution Bench in **Sahara India Real Estate Corpn. Ltd. v. SEBI** (2012) 10 SCC 603 held at paragraphs 17 and 20 of the said judgment as follows:

*"We hold that the High Courts and the Supreme Court have inherent jurisdiction to pass postponement orders which are justiciable in the form of **postponement/prohibitory orders against the media in appropriate cases**...Such a right flows from the inherent powers of the superior courts and balancing of rights under Article 19(1)(a) on one hand and Article 21 on the other. The postponement orders are not prohibited under Article 19(2)...The postponement orders can be*

passed by courts even in civil and criminal cases to prevent real and substantial risk of prejudice to the proper administration of justice as a last resort where such risk cannot be prevented by other reasonably available means."

— *Sahara India Real Estate Corpn. Ltd. v. SEBI*, (2012) 10 SCC 603, paragraphs 17 and 20 (Constitution Bench, Supreme Court of India)

- 33.** This Constitution Bench authority directly empowers the Ld. Trial Court — and this Hon'ble Court— to grant postponement orders against the film 'BOSS,' which poses a real and substantial risk of prejudice to the proper administration of justice in C.C. No.1319/2024. The Ld. Trial Court's failure to apply this Constitution Bench judgment is a grave constitutional infirmity.
- 34.** The Supreme Court in **M.P. Lohia v. State of West Bengal** (2005) 2 SCC 686, at paragraph 5 of the said judgment, held as follows:
- "We are clearly of the opinion that there should be a halt to this trial by media when the matter is sub-judice. We have repeatedly pointed out the harmful effects of such publications on the accused, the witnesses and even the courts... We, therefore, strongly deprecate such practice of trial by media when the matter is sub-judice. Such publications would be regarded as interference with the administration of justice."*
- *M.P. Lohia v. State of West Bengal*, (2005) 2 SCC 686, paragraph 5 (Supreme Court of India)
- 35.** A full-length feature film with an 'Inspired by True Events' declaration is infinitely more prejudicial than a media report. If the Supreme Court has deprecated even news media 'trial by media,' the Ld. Trial Court's vacation of the injunction against a commercially produced full-length film dramatising the prosecution's case is manifestly contrary to this binding ratio.
- 36.** The Supreme Court in **Sidhartha Vashisht @ Manu Sharma v. State (NCT of Delhi)** (2010) 6 SCC 1, at paragraph 47 of the said judgment, held as follows:
- "Trial by media has been a matter of serious concern not only in India but across the world. There is no doubt that the freedom of press extends to the reporting of court proceedings, but at the same time, any publication which tends to prejudice the fair trial of a criminal case and interferes with the administration of justice would amount to contempt of court. It is very important for the judiciary to maintain*



the balance between the freedom of the press and the right of the accused to a fair trial."

— Sidhartha Vashisht @ Manu Sharma v. State (NCT of Delhi),
(2010) 6 SCC 1, paragraph 47 (Supreme Court of India)

37. This ratio directly condemns the dramatised cinematic re-enactment of the prosecution's case in S.C. No.1319/2024, while the trial is mid-stream, as being prejudicial to the right of Appellant No.1 to a fair trial.

38. This Hon'ble Court itself, in W.P. No.7473/2026 (NC: 2026:KHC:24468), at paragraph 24 of the said order, held as follows:

*"Freedom of speech is a cherished constitutional value; however, when it degenerates into media-driven adjudication, it ceases to be a safeguard of democracy and becomes a threat to it. **The press is a watchdog, but when it assumes the role of judge, jury and executioner, the rule of law stands imperiled. Courts cannot permit the course of justice to be overshadowed by the glare of studio lights.**"*

— W.P. No.7473/2026 (NC: 2026:KHC:24468), paragraph 24 (High Court of Karnataka, per the Hon'ble Mr. Justice Sachin Shankar Magadum, 30.04.2026)

39. If television broadcasts amount to 'media-driven adjudication' warranting mandatory regulatory action, the production and release of a commercially distributed feature film dramatising the prosecution's case — with an 'Inspired by True Events' declaration — is a fortiori equally and in fact more severely contemptuous of the pending proceedings. The Ld. Trial Court's Impugned Order, by permitting the film's release, has directly contradicted this coordinate High Court order.

**GROUND C: ABDICATION OF EQUITABLE JURISDICTION —
ERRONEOUS IMMUNISATION OF CBFC CERTIFICATION**

40. The Ld. Trial Court held at paragraph 23 of the Impugned Order that "when the defendant No.3 authority issued certificate to the movie in question, prima facie it can be construed that, the authority has taken into account all the guidelines" and that "the court cannot sit as a Super Censor Board once the movie has been certified by the statutory authority." This reasoning is fundamentally erroneous.

41. The Division Bench in the Black Friday case in **Mushtaq Moosa Tarani** (supra) expressly addressed the CBFC certification defence and rejected it at paragraph 14 of the said judgment as follows:

"Merely because the film has been certified by the Board of Censors does not mean that a court cannot restrain its public exhibition, if the court comes to the conclusion that the exhibition of the film would amount to contempt of the court... The Board of Censors is not a court. It cannot adjudicate on the question whether a publication amounts to contempt of court or not."

— *Mushtaq Moosa Tarani v. Government of India*, (2005 SCC OnLine Bom 385), paragraph 14 (Division Bench, Bombay High Court)

42. The Ld. Trial Court's holding that it 'cannot sit as a Super Censor Board' misconstrues its role entirely. The question before it was not one of censorship but one of whether the exhibition of the film would amount to contempt of court and interference with the administration of justice — a question exclusively within the domain of courts, not the CBFC.
43. The CBFC Certificate No. DIL/7/33/2026-BAN was obtained by Respondents No.1 and 2 on the basis of a demonstrably false plot summary describing the protagonist as a 'cricket player,' when the teaser shows no such thing. A certificate obtained by fraud, misrepresentation, or false material placed before the statutory authority is void ab initio and confers no legitimacy upon the film. The Ld. Trial Court ought to have gone behind the certificate and examined this fundamental infirmity.
44. Section 5B(1) of the Cinematograph Act, 1952 mandates refusal of certification to films that are against the public interest or that **involve contempt of court**. A film explicitly declared as 'Inspired by True Events' replicating the prosecution's version in an ongoing murder trial manifestly falls within the prohibition of Section 5B. The CBFC's failure to apply this provision renders its certificate void ab initio.

GROUND D: CONDONATION OF CONTEMPT — THE FILM AS A VEHICLE TO EVADE BINDING ORDERS OF THIS HON'BLE COURT

45. This Hon'ble Court in W.P. No.7473/2026 (NC: 2026:KHC:24468) held at paragraph 22 of the said order as follows:



"The material on record unmistakably discloses violations of Rule 6(1)(d), (e), (f) and (i) of the Programme Code under the Cable Television Networks (Regulation) Act, 1995. Such broadcasts are per se illegal and invite regulatory action under Sections 19 and 20 of the Act. The acts further attract the mischief of Section 2(c)(ii) and (iii) of the Contempt of Courts Act, 1971. The digital amplification of such content attracts Section 79(3)(b) of the Information Technology Act, 2000 read with Rule 3(7)(b) of the Intermediary Rules, 2021."

— W.P. No.7473/2026 (NC: 2026:KHC:24468), paragraph 22 (High Court of Karnataka, 30.04.2026)

46. The film 'BOSS' is an escalation — on an exponentially larger commercial scale — of precisely the same conduct that this Hon'ble Court has declared to attract the mischief of the Contempt of Courts Act. The Ld. Trial Court's vacation of the injunction has rendered the protective orders of this Hon'ble Court and five other courts nugatory.
47. The Supreme Court in **In Re: P.C. Sen** (AIR 1970 SC 1821) held as follows:
- "It is a well established principle that any act done or writing published which is calculated to bring a court or a judge into contempt, or to lower his authority, or to interfere with the due course of justice or the lawful process of the court is a contempt of court...A publication which tends to interfere with the course of justice is a contempt even if it is not intended to do so. The intention of the publisher is immaterial and what has to be seen is its tendency and the likely effect on the administration of justice."*
- In Re: P.C. Sen, AIR 1970 SC 1821 (Supreme Court of India)
48. The film 'BOSS' — by dramatising the prosecution's case in a pending murder trial as 'Inspired by True Events' and releasing it to mass audiences — has a clear tendency to interfere with the course of justice in S.C. No.1319/2024. The Ld. Trial Court's failure to apply this principle is a grave error of law.
49. The Supreme Court in **In Re: Harijai Singh** (1996) 6 SCC 466 held as follows:
- "Free press does not mean an unbridled or unregulated press. The right conferred by Article 19(1)(a) is subject to the restrictions imposed under Article 19(2). The courts of justice are entitled to expect, and indeed to require, that their proceedings should be*

conducted without interference by third parties. Any publication which tends to interfere with the due course of justice or with the authority of the courts is a contempt of court."

— In Re: Harijai Singh, (1996) 6 SCC 466 (Supreme Court of India)

50. The production and release of a commercially distributed feature film dramatising the prosecution's version of an ongoing murder trial, with an 'Inspired by True Events' declaration, squarely falls within this description of interference with the due course of justice.

GROUND E: MISAPPROPRIATION OF PERSONALITY RIGHTS AND INVASION OF PRIVACY UNDER ARTICLE 21 — ERRONEOUS DISMISSAL OF 'BOSS' AS A GENERIC TERM

51. The Ld. Trial Court dismissed the title 'Boss' as a 'generic term used widely in the film industry and in general usage' and held that 'no monopoly can be claimed over such a generic title.' This reasoning is erroneous in law and on facts. The question is not whether the word 'Boss' is a dictionary word, but whether — in the specific context of Kannada cinema and public discourse in Karnataka — the title 'BOSS' exclusively and unmistakably identifies Appellant No.1.
52. The Nine-Judge Constitution Bench of the Supreme Court in **Justice K.S. Puttaswamy (Retd.) v. Union of India** (2017) 10 SCC 1, at paragraph 297 of the said judgment, held as follows:
- "Privacy is a constitutionally protected right which emerges primarily from the guarantee of life and personal liberty in Article 21 of the Constitution. Privacy includes at its core the preservation of personal intimacies, the sanctity of family life, marriage, procreation, the home and sexual orientation. Privacy also connotes a right to be left alone. Privacy safeguards individual autonomy and recognises the ability of the individual to control vital aspects of her or his life. Personal choices governing a way of life are intrinsic to privacy."
- Justice K.S. Puttaswamy (Retd.) v. Union of India, (2017) 10 SCC 1, paragraph 297 (Nine-Judge Constitution Bench, Supreme Court of India)
53. The commercial exploitation of Appellant No.1's public persona, family circumstances, and the facts of his ongoing criminal trial — without his consent — in a mass-produced and commercially distributed feature film, strikes at the core of this constitutionally protected right to privacy and personal autonomy.

54. The Supreme Court in **R.N. Rajagopal v. State of Tamil Nadu** (1994) 6 SCC 632 held as follows:

"The right to privacy is implicit in the right to life and liberty guaranteed to the citizens of this country by Article 21. It is a 'right to be let alone.' A citizen has a right to safeguard the privacy of his own, his family, marriage, procreation, motherhood, child-bearing and education, among other matters. None can publish anything concerning the above matters without his consent whether truthful or otherwise and whether laudatory or critical...Any violation of this right gives rise to an action for damages."

— R.N. Rajagopal v. State of Tamil Nadu, (1994) 6 SCC 632
(Supreme Court of India)

55. The film 'BOSS' constitutes a direct violation of Appellant No.1's right to privacy under Article 21 as articulated in **R.N. Rajagopal**. His family circumstances, the allegations against him, and the facts of the pending criminal trial have been commercially exploited without his consent to produce a mass-audience feature film declared as 'Inspired by True Events.'

56. The Karnataka High Court in **Sonakka Gopalagowda Shanthaveri and others v. U.R. Anantha Murthy and others** (1987 SCC Online Kar 367 = AIR 1988 Kar 255) held that the right to reputation and good name is an inseparable component of personal liberty under Article 21, and that courts have the power and the duty to protect this right from being undermined by publications that directly relate to the subject matter of pending civil and criminal proceedings. The Ld. Trial Court's failure to engage with and apply this coordinate High Court judgment is an additional ground of perversity in the Impugned Order.

**GROUND F: FATALLY FLAWED BALANCE OF CONVENIENCE —
COMMERCIAL INVESTMENT IN BAD FAITH CANNOT OVERRIDE
CONSTITUTIONAL RIGHTS**

57. The Ld. Trial Court held at paragraph 24 of the Impugned Order: "it appears that, in the event of granting injunction, hardship is more to the defendants No.1 and 2 rather than the plaintiffs. In the event, the plaintiffs able to establish at trial, that the movie in question is based on the plaintiff No.1 and the same would cause serious injury to the reputation of the

plaintiffs, they can be suitably compensated." This reasoning is incorrect in law.

- 60.** The Supreme Court in **Bloomberg Television Production Services India Pvt. Ltd. v. Zee Entertainment Enterprises Ltd.** (2024 SCC OnLine SC 426), the most recent Supreme Court pronouncement on the tripartite test in media injunction suits, held as follows:

*"Irreparable injury is one of the most important factors to be considered while granting or refusing the injunction...In cases involving infringement of fundamental rights, the court should carefully consider whether monetary compensation after trial would be an adequate remedy. Fundamental rights, by their very nature, cannot always be adequately compensated by a monetary award. In such cases, **the balance of convenience would generally tilt in favour of protecting the fundamental right, irrespective of the commercial interests of the other party.**"*

— *Bloomberg Television Production Services India Pvt. Ltd. v. Zee Entertainment Enterprises Ltd., (2024 SCC OnLine SC 426)*
(Supreme Court of India)


- 58.** The Ld. Trial Court's finding that the Appellants 'can be suitably compensated' if they succeed at trial is directly contrary to this Supreme Court holding. The contamination of the evidentiary pool, the prejudice to witnesses, the erosion of the presumption of innocence, and the irreversible damage to the Appellants' reputation once a mass-audience film is exhibited — all constitute irreparable injury of the kind that cannot be compensated monetarily.
- 59.** It is a fundamental principle of equity that a party who approaches the court with unclean hands — having proceeded with commercial activity in knowing defiance of a subsisting court order — cannot claim equitable sympathy for financial losses arising from the enforcement of that order. The Respondents were made aware of the protective orders as early as the date of service of the statutory notice on 12.03.2026. Their financial investment was made in mala fide defiance of the Appellants' rights. Such commercial risk cannot form the basis for vacating a legitimate protective injunction.

**GROUND G: ARBITRARY VACATION OF THE EX-PARTE INJUNCTION
— NO CHANGE IN MATERIAL CIRCUMSTANCES**



60. The Ld. Trial Court granted the comprehensive ex-parte injunction on 27.03.2026 upon recording a prima facie case. The foundational material facts that informed that prima facie finding — the 13 factual parallels, the 'Inspired by True Events' declaration, the director's admissions, the CBFC notice, the five protective orders, and the sub-judice status of C.C. No.1319/2024 — remained completely, materially, and unalterably the same on 02.06.2026. The Respondents did not place any new fact on record that either contradicted these parallels or demonstrated a supervening change in circumstances that would justify vacation of the injunction.
61. The only new development between 27.03.2026 and 02.06.2026 was the Respondents' filing of a written statement — a self-serving pleading — and financial claims of investments made. Written statements, by their very nature, are one-sided pleadings; they cannot, standing alone and without any independent verification or trial, form the basis for vacating a court order that was granted on the basis of positive prima facie material.
62. The Ld. Trial Court's complete reversal of its own considered order of 27.03.2026 — based solely on the Respondents' uncorroborated financial claims and their bald paper defence of the 'cricketer' protagonist — without any trial, without any cross-examination, and without any material change in circumstances — constitutes a failure to exercise equitable jurisdiction and is an independent ground of appeal.

GROUND H: VIOLATION OF SECTION 5B OF THE CINEMATOGRAPH ACT, 1952 — CERTIFICATION OBTAINED BY MISREPRESENTATION IS VOID AB INITIO

63. Section 5B(1) of the Cinematograph Act, 1952 mandates that a film shall not be certified if any part of it is "against the public interest" or is against the "interest of decency or morality" or involves "contempt of court." The Guidelines issued by the Central Government under Section 5B specifically prohibit certification of films that "contain visuals or words which reflect on the character of an individual in a way as to lower his dignity" or that tend to incite the commission of any offence.
- 

64. A film that replicates the prosecution's case against an undertrial accused who enjoys the presumption of innocence, in an ongoing murder trial, declaring itself 'Inspired by True Events,' manifestly interferes with the administration of justice and involves contempt of court within the meaning of Section 5B. The CBFC could only have granted the certificate because Respondents No.1 and 2 presented a false plot summary describing the protagonist as a 'cricket player' that concealed the film's true basis. A certificate obtained through material misrepresentation is void ab initio under the general law.
65. The Ld. Trial Court's failure to examine or inquire into this statutory infirmity — despite it being raised before the Court — is an additional and independent ground for setting aside the Impugned Order.

GROUND I: VIOLATION OF BINDING ORDERS OF THIS HON'BLE COURT — INTERNATIONAL COMPARATIVE JURISPRUDENCE ON PREJUDICIAL PUBLICITY

66. The dangers of prejudicial pre-trial publicity through the powerful medium of cinema have been addressed by courts worldwide. This Hon'ble Court in W.P. No.7473/2026 (NC: 2026:KHC:24468) at paragraph 15 of the said order specifically cited and adopted the following international authorities:
67. The United States Supreme Court in **Sheppard v. Maxwell**, 384 U.S. 333 (1966), cited at paragraph 15 of W.P. No.7473/2026 (NC: 2026:KHC:24468), held as follows:

*"Due process requires that the accused receive a trial by an impartial jury free from outside influences. Given the pervasiveness of modern communications and the difficulty of effacing prejudicial publicity from the minds of the jurors, the trial courts must take strong measures to ensure that the balance is never weighed against the accused...A responsible press has always been regarded as the handmaiden of effective judicial administration, especially in the criminal field...**But the Court has also shown, that it will not tolerate actual or threatened mob violence or indeed any conduct that creates the appearance of a trial by mob rather than by law.**"*

— *Sheppard v. Maxwell*, 384 U.S. 333 (1966), as cited at paragraph 15 of W.P. No.7473/2026 (NC: 2026:KHC:24468)

68. A feature film commercially exhibited to mass audiences in theatres and on OTT platforms creates precisely the 'carnival atmosphere' around pending criminal proceedings that Sheppard v. Maxwell deprecated. The Ld. Trial Court's Impugned Order enables precisely such a carnival to surround C.C. No.1319/2024.

69. The European Court of Human Rights in **Alenet de Ribemont v. France**, (1995) 20 EHRR 557, cited at paragraph 16 of W.P. No.7473/2026 (NC: 2026:KHC:24468), held as follows:

"The Court notes that the right to the presumption of innocence will be violated if, without the accused's having first been proved guilty according to law and, notably, without his having had the opportunity of exercising his rights of defence, a judicial decision concerning him reflects an opinion that he is guilty...The authorities' incitement to the public to consider him as guilty could not but be understood by the public concerned as an official declaration of the guilt of a person who had not yet been tried, and inevitably encouraged the public to believe him guilty."

— Alenet de Ribemont v. France, (1995) 20 EHRR 557, as cited at paragraph 16 of W.P. No.7473/2026 (NC: 2026:KHC:24468)

70. The film 'BOSS,' by dramatising the prosecution's case as 'Inspired by True Events' while simultaneously projecting the protagonist's guilt through its narrative, violates the presumption of innocence of Appellant No.1 in the eyes of the mass audiences who will view the film — including potential witnesses and persons connected to the trial.

71.. The above appeal is valued under _____ of schedule _____ of The Karnataka Court Fees and Suits Valuation Act, hence court fee of Rs. _____/- is paid.

PRAYER

In the premises aforesaid, it is most humbly prayed that this Hon'ble Court may be pleased to:

(a). CALL FOR THE RECORDS of O.S. No.2151/2026 from the Court of the XVII Additional City Civil and Sessions Judge, Bengaluru (CCH-16), and



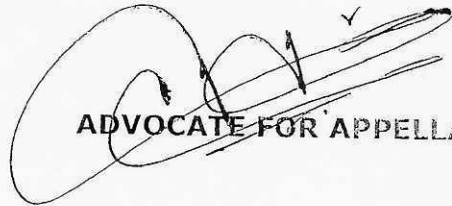
examine the legality, propriety, and correctness of the Impugned Order dated 02.06.2026 in I.A. No.1;

(b). SET ASIDE AND QUASH the Impugned Order dated 02.06.2026 passed in I.A. No.1 in O.S. No.2151/2026 (ANNEXURE A) as being contrary to law, perverse on facts, violative of the Appellants' fundamental rights under Articles 14, 19, and 21 of the Constitution of India, and contrary to the binding orders of this Hon'ble Court in W.P. No.7473/2026 (NC: 2026:KHC:24468);

(d). PASS SUCH OTHER AND FURTHER ORDERS as this Hon'ble Court may deem fit and proper in the facts and circumstances of the case, in the interests of justice, equity, and the preservation of the purity of the judicial process in C.C. No.1319/2024.

Place: Bengaluru

Date: 16.06.2026


ADVOCATE FOR APPELLANTS

ADDRESS FOR SERVICE:

Pratham N, Alok G S & Vivek G B,

DHEE INC., ADVOCATE & SOLICITORS,

#401 (south wing), Brigade Plaza,

Anandh Rao Circle,

Bangalore 560 009.

prathamn15@gmail.com

31

IN THE HIGH COURT OF KARNATAKA AT BANGALORE

No. ___/2026

Between

DARSHAN S & ANR

...Petitioners/Appellant

And

SIRI PRODUCTIONS

AND ORS

...Respondents

VERIFYING AFFIDAVIT

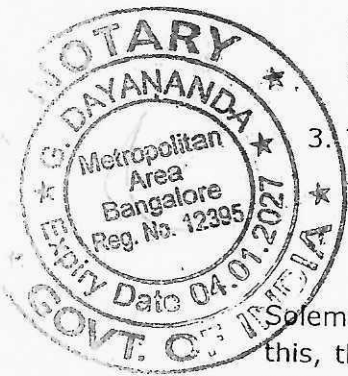
I, DARSHAN SRINIVAS, SON OF LATE S/O LATE TOOGUDEEPA SRINIVAS, R/O 217 TOOGUDEEPA NILAYA, F ROAD, IDEAL HOME TOWNSHIP, RAJARAJESHWARINAGAR, BENGALURU, DO HEREBY SOLEMNLY SWEAR AND STATE ON OATH AS FOLLOWS:

1. I am the Petitioner/Appellant No.1 and am aware of the facts and circumstances of the present case and I am authorised to swear this affidavit on behalf of the Petitioner/Appellant No.2.
2. The averments contained in paragraphs 1 to ___ of the Caveat Petition are true to the best of my knowledge, information and belief.
3. The documents produced as Annexure A to Annexure ___ are true copies of the originals.

Solemnly sworn to before me on this, the 10 day of JUNE 2026, at Bangalore, by the aforesaid DARSHAN SRINIVAS. "Before me"

[Signature]
DEPONENT

UTP NO. 7314/25



NOTARY

Asst. Superintendent

Central Prison
BENGALURU

SWORN TO BEFORE ME

Identified by me:

[Signature]
ADVOCATE

G. DAYANANDA
Advocate & Notary
Govt. of India
61, 2nd Floor, 7th Cross
Malleshwaram
Bangalore - 560 003

Sl. No. 109 Page No. 65
Vol. II dated 10/6/2026

No. of Compositions three

ABC010088192026



CR 62528/26

32

50

Adv. for. plf

CC #1-16

dt 15/6/26

ANNEXURE - A

Order Sheet

In the Court of PRL CITY CIVIL AND SESSIONS JUDGE

FR No. : O.S./2111/2026

Registration No. : O.S./2151/2026

OS 2151/26

Plaintiff Vs Defendent

- 1) DARSHAN SRINIVAS
- 2) VIJAYALAKSHMI DARSHAN

- 1) SIRI PRODUCTIONS
- 2) LAVA V
- 3) CENTRAL BOARD OF FILM CERTIFICATION CBFC
- 4) KARNATAKA FILM CHAMBER OF COMMERCE KFCC
- 5) META PLATFORMS INC FACEBOOK
- 6) X CORP FORMERLY TWITTER
- 7) GOOGLE LLC
- 8) NEW INDIAN EXPRESS
- 9) FILMI BEAT
- 10) TV 9 KANNADA
- 11) ZEE KANNADA NEWS

Nature of Case :

INJUNCTION SUIT

Provision of Law :

Order 7 Rule 1 R/W section 26 CPC,

Advocate for Plaintiff Sri./Smt. :

ABHISHEK PRATHAM N

Date of Filing :

25-03-2026

Date of Registration :

25-03-2026

Relief :

PRAYS TO PASS A JUDGMENT AND DECREE TO GRANTING PERPETUAL PROHIBITOR INJUNCTION RESTRAINING THE DEFENDANT NO.1 AND 2. ITS PRODUCERS, DIRECTORS, LAVA V LEAD ACTOR TANUSH S, THEIR REPRESENTATIVES ASSOCIATES, SERVANTS, AGENTS, EMPLOYEES MEN, OR ANYONE CLAIMING THROUGH OR UNDER THEM FROM IN ANY MANNER PRODUCING FILING EDITING, PROMOTING, MARKETING, RELEASING, AND AS PRAYED IN THE PLAINT.

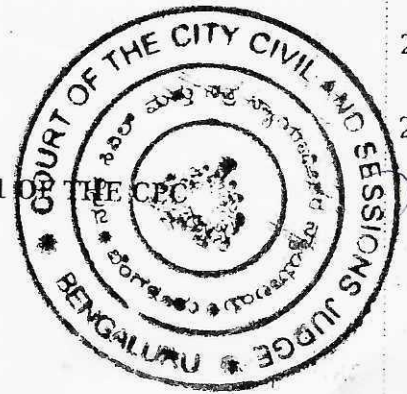
Date of Cause of action :

17-03-2026

Receipt No.

Date	Purpose	Mode	Bank Name	Amount
81821/2025-2026 25-03-2026	Process Fee	Cash		200.00
81821/2025-2026 25-03-2026	Court Fee on Plaint	Cash		200.00

1) IA 1/2026 - U/O XXXIX RULE 1 AND 2 R/W SEC 151 OF THE CPC



02 (33) (51)

0-5 2151/26

IA Relief : PRAYS TO GRANT AN ORDER EX PARTE AD INTERIM T.I. DIRECTING THE DEFENDANT No.1 AND 2 ITS PRODUCERS, DIRECTORS, THE THEIR REPRESENTATIVES, ASSOCIATES SERVANTS, AGENTS, EMPLOYEES MEN OR ANYONE CLAIMING THROUGH OR UNDER THEM FROM IN ANY MANNER PRODUCING, FILMING, EDITING, PROMOTING MARKETING RELEASING DISTRIBUTING EXHIBITING TELECASTING STREAMING SELLING LICENSING, LEASING OR DEALING WITH THE MOVIE TILTED BOSS BASED ON OR DEPICTS THE LIFE OF THE PLAINTIFFS, THE INCIDENTS ALLEGED IN THE CRIMINAL CASE PENDING IN CC NO. 1319/2024 BEFORE LVI ADDL. CITY CIVIL AND SESSIONS JUDGE, BANGALORE OR ANY ELEMENTS DIRECTLY OR INDIRECTLY REFERRING TO OR ASSOCIATING WITH THE PLAINTIFFS PRIVATE LIFE, FAMILY REPUTATION THE SUB JUDGE CRIMINAL PROCEEDINGS OR ANY OTHER SIMILAR INCIDENTS, AND FROM USING THE PLAINTIFFS NAME, IMAGE, LIKENESS, PERSONALITY RIGHTS, OR ANY PROMOTIONAL MATERIAL IN ANY MEDIUM INCLUDING THEATERS AND INTERMEDIARY STREAMING PLATFORMS BY APPOINTING A RECEIVER FOR ENFORCEMENT OF THE PRESENT ORDER IN THE INTEREST OF JUSTICE AND EQUITY.

CAO/CMO

Registered and made over this case to CCH-court for disposal according to law.

16

No caveat

[Signature]
PRL CITY CIVIL AND SESSIONS JUDGE
BENGALURU

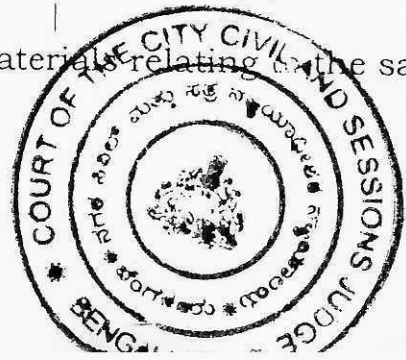
26-3-26
P.P.N.
1 MAI
w/o 39/1/24

Head Counsel for
plaintiff on I.A. No. I
dated 27/3/26.
[Signature]
26/3

27-3-26
P.P.N.
For orders.

INTERIM ORDERS ON I.A. NO.1

Perused I.A.No.I filed by the plaintiffs under Order XXXIX Rules 1 and 2 R/w Sec.94(d) and Sec.151 of CPC in the background of material relating to the same.



3H

2

O.S.No.2151/2026

The relief sought under I.A.No.I is to grant an order of exparte ad-interim temporary injunction directing the Defendant No.1 and Defendant No.2, its producers, directors, their representatives, associates, servants, agents, employees, men or anyone claiming through or under them, from in any manner producing, filming, editing, promoting, marketing, releasing, distributing, exhibiting, telecasting, streaming, selling, licensing, leasing, or dealing with the movie titled "BOSS" (or any other movie / film / web-series / content by whatever name called) based on or depicts the life of the Plaintiffs, the incidents alleged in the criminal case pending in C.C.No.1319/2024 before the LVI Addl. City Civil and Sessions Judge, Bengaluru, or any elements directly or indirectly referring to or associating with the Plaintiffs private life, family, reputation, sub-judice criminal proceedings or any other similar incidents, and from using the Plaintiffs' name, image, likeness, personality rights, or any promotional material (posters, teasers, trailers, press meets, interviews, etc.) in any medium including Theatres and/or Intermediary Streaming Platforms (OTT) whatsoever by appointing a receiver for enforcement of the present order.

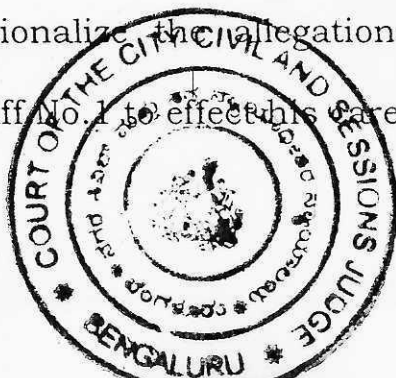


33 35

31

O.S.No.2151/2026

2. In her supportive affidavit to the application, the plaintiff No.2 stated that the defendant No.1 banner has produced the movie title "BOSS" by Thanush Shivanna, Directed by Defendant No.2 Lava V with Thanush Shivanna playing lead role. That the teaser of the movie released on 09.03.2026 refers to killing of a person, the audio of a person requesting not to kill him as he has a pregnant wife at home and aged parents, the body being found next to a drainage pipeline, arrest of a celebrity, investigation regarding the killings, the movie having two female leads, and the fans of the lead actor in the movie referring to him as "BOSS", the incident in the movie occurring in Bengaluru, etc., all of which are similar to the crime that the Plaintiff No.1 is currently under trial before the LVI Addl. City Civil and Sessions Judge, Bengaluru in C.C.No.1319/2024. The Plaintiff No.1 is a movie actor, producer and is known for playing as lead in numerous successful Kannada movies and Plaintiff No.2 is the wife of Plaintiff No.1. Due to the fact that plaintiff No.1 is a celebrity with huge fan following, numerous attempts have been made by media, channels, third parties and other people within and outside the industry trying to sensationalize the allegations and the Case filed against the Plaintiff No.1 to effect his career.



54 36

3. Further it is stated in the affidavit that the Defendant No.1 & 2 have with the intention of using the popularity that the Plaintiff No.1 and the curiosity that the public has regarding the case filed against the Plaintiff No.1 has made movie title "BOSS". They have edited the teaser in such a manner that it has created a buzz among public and journalists that the movie is similar to the Plaintiffs life. The teaser and other promotional material are in violation of the protection granted by the Hon'ble High Court of Karnataka and Hon'ble District and Sessions Courts. They produced the movie without obtaining any prior permission or providing any intimation or information to neither the Plaintiffs nor any other party/authorities despite being aware that the case is sub-judice. Defendant No.2 claims to be an advocate and also explicitly states that the he is aware that the case against the Plaintiffs is sub-judice but conveniently makes a movie based on Plaintiff No.1 by making few minor changes in an attempt to circumvent from legal consequences. Defendant No.1 has ignored the court orders, which have provided protection to the reputation and privacy of the Plaintiff and his family members by directing the media or any other third party from publishing, telecasting,



55

37

5

O.S.No.2151/2026

distributing any unverified news, statements, claims etc., which may tarnish the image of the Plaintiff. The title "BOSS" is one of the movie in which the Plaintiff No.1 has acted in lead role. The teaser showing the death of a fan, the protagonist in the movie being referred to as "BOSS" which is similar to how the plaintiff No. 1 is referred to by his fans as "D-Boss" the protagonist in the movie being involved in killing of his fan, all of which are not coincidences or inspired by any other events as claimed by the Defendant No.1 and 2. These similarities prima facie show that the said movie is based on the Plaintiff's life and the pending criminal proceedings which is clearly in violation of their rights to privacy.

4. Besides it is stated in the affidavit that the Plaintiffs through their advocates had gotten a statutory notice issued to Shri.Yashwant Shehnai, the Regional Officer of the Defendant No.3 under Section 5B of the Cinematograph Act read with Cinematograph Rules seeking to forthwith cease examination/refusal of certification. Despite, the Defendant No.3 authority has provide the Defendant No.1, the certificate which would enable them to exhibit the movie in public by screening it in

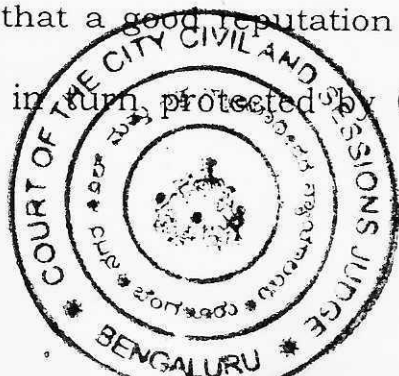


5B

38

theaters, releasing it on televisions or distribute them in physical form in CDs or DVDs. The Defendants No.1 & 2 provided summary to the Defendant No.3 authority for certification of the said movie. The plot summary of the film is that "The films protagonist, a famous cricket player, has made a name for himself in the cricket world. One day a man repeatedly sends obscene messages and calls to his girlfriend. Angered by this, Jeevan who works at her house and his friends find the man and beat him up mercilessly. The incident then takes many turns and revolves around the protagonist."

5. From the above plot summary it can be clearly seen that except for the protagonist being a "famous cricket player" the entire story line remains similar to the crime that has been alleged against the Plaintiff No.1. The Defendant No.1 and Defendant No.2 have been blatantly lying before the media, public and any person who has raised questions regarding the movie in order to circumvent the protection to the reputation and privacy granted to the Plaintiffs and their family members. It is well settled principal of law that a good reputation is an element of personal security and is in turn, protected by Constitution. The Plaintiff and his



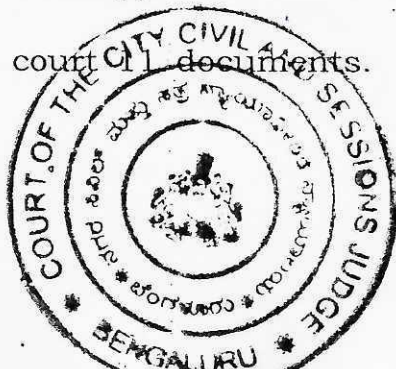
~~39~~ 39

7

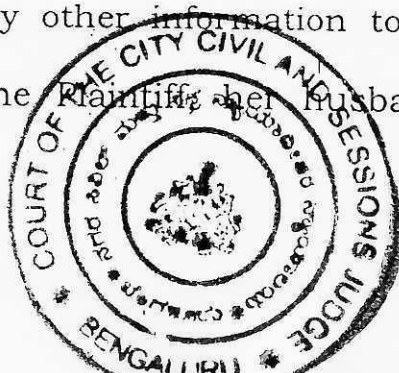
O.S.No.2151/2026

family have been struggling both mentally and emotionally due to the conduct of the Defendant No.1 and Defendant No.3 to 7 who have been telecasting the promotional material of the movie continuously violating the fundamental right of a citizen. The movie "BOSS" has already received certification from the Defendant No.3 authority and in the event the movie "BOSS" is permitted to be exhibited in cinema halls, multiplexes or theaters or on any of the OTT or any other platform, it would cause immediate, widespread and irreparable harm to the Plaintiffs' reputation, privacy and right to fair trial. Wherefore, if the present application is not allowed and notice to the defendants is ordered at the first instance, the delay provide the Defendant No.1 an opportunity to release the movie and make the present suit infructuous, and it would result in miscarriage of justice. Plaintiffs have good case on merits and fair chances of success. They have made out a prima facie case for grant of injunction and the balance of convenience lies in their favor. Wherefore, prayed to allow the application.

6. In support of their said grievance, the Plaintiffs placed before the court 01 documents. The court scrutinized the application



and the documents produced in support of the same. From that scrutiny it is noticed that the Hon'ble High Court in W.P.No.24836/2024, a repetition filed by the Plaintiff No.1 herein against Pratham N and other 40 respondents passed an order restraining the respondents therein from publishing, printing, airing and disseminating confidential information contained in the charge sheet in relation to crime No.0250/2024 registered by the Kamakshipalya Police Station. Further it is noticed that the Xth Addl.City Civil and Sessions Judge in O.S.No.6082/2024 filed by the Plaintiff No.2 herein against the print and electronic media persons granted an order of interim injunction restraining the defendants therein from airing or printing, publishing unverified statements, unauthenticated information or opinion which lower's the image of the Plaintiff therein in any print media, newspaper, television channels, local cable operated channels or internet/websites and electronic and social media. Similarly in O.S.No.4267/2024, the Xth Addl.City Civil and Sessions Judge passed interim order of injunction in favour of Plaintiff No.2 herein and against media persons from printing, publishing, telecasting the news or any other information touching the personal and family life of the Plaintiff's her husband Darshan Srinivas or



59

111

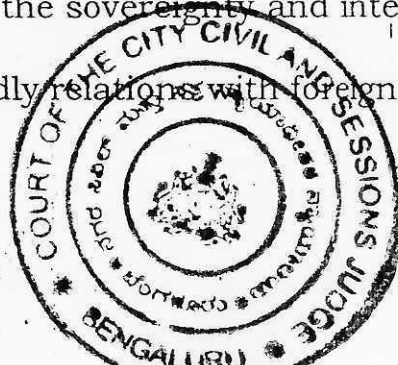
9

O.S.No.2151/2026

publishing or telecasting any unauthenticated information/opinion in connection with the investigation in Crime No.250/2024 conducted by Kamakshipalya Police Station.

7. So from the afore quoted interim orders passed by the courts of law, prima facie it appears to the court that already protection is provided to the reputation and privacy of the Plaintiffs and their family members. In this context, be it noted that the plot story of the movie titled as "BOSS" prima facie tally with the alleged incident involved in Crime No.250/2024 of Kamakshipalya Police Station and culminated in C.C.No.1319/2024. This is prima facie evident from the videos and articles related to the promotion of the movie "BOSS", its teaser, press meet etc. Overtly the trial in C.C.No.1319/2024 is under progress.

8. At this juncture, as rightly contended by the learned counsel for Plaintiffs one of the guidelines enumerated under Sec.5B of the Cinematograph Act, 1952 is that "A film shall not be certified for public exhibition if, in the opinion of the authority competent to grant the certificate, the film or any part of it is against the interest of the sovereignty and integrity of India the security of the state friendly relations with foreign states, public order, decency or



10

H2

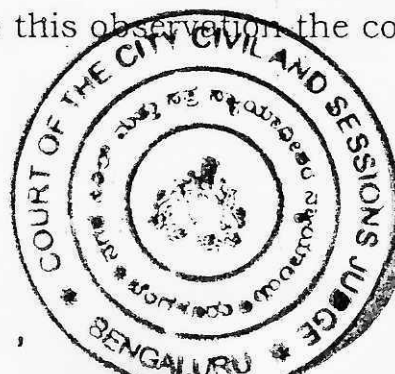
10

O.S.No.2151/2026

morality, or involves defamation or contempt of court or is likely to incite the commission of any offence”.

9. It is the grievance of Plaintiff that though their advocate had issued statutory notice to Defendant No.3 – Central Board of Film Certification under said Sec.5B of the said Act to refuse certification of the Film in the movie in question, has provided Defendant No.1 the certificate, which enable Defendants No.1 and 2 to exhibit the movie by screening it in various platforms.

10. Therefore, under aforesaid mentioned facts and circumstances of the case, if notice is issued, in the intermittent, the Defendants No.1 and 2 may telecast/exhibit the movie in question in various platforms as alleged by the Plaintiffs and in that event, the object behind the institution of this suit will be defeated. The interim relief provided under Order XXXIX Rules 1 and 2 of CPC is a preventive remedy to protect the rights of the parties from being defeated. Wherefore, it is necessary to pass the interim orders. However as prayed under I.A.No.I, receiver cannot be appointed for enforcement of order at this premature stage of the suit. Subject to this observation, the court proceed to pass the following;



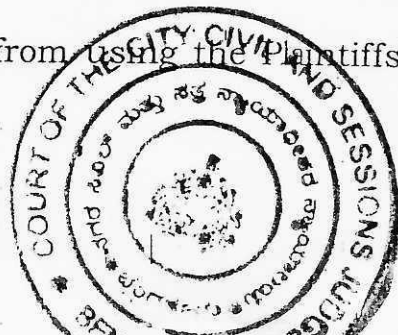
11

HB

O.S.No.2151/2026

ORDER

The Defendants No.1 and 2, its producers, directors, their representatives, associates, servants, agents, employees, men or anyone claiming through or under them, from in any manner producing, filming, editing, promoting, marketing, releasing, distributing, exhibiting, telecasting, streaming, selling, licensing, leasing, or dealing with the movie titled "BOSS" (or any other movie / film / web-series / content by whatever name called) based on or depicts the life of the Plaintiffs, the incidents alleged in the criminal case pending in C.C.No.1319/2024 before the LVI Addl. City Civil and Sessions Judge, Bengaluru, or any elements directly or indirectly referring to or associating with the Plaintiffs private life, family, reputation, sub-judice criminal proceedings or any other similar incidents, and from using the Plaintiffs' name, image,



likeness, personality rights, or any promotional material (posters, teasers, trailers, press meets, interviews, etc.) in any medium including Theatres and/or Intermediary Streaming Platforms (OTT) whatsoever till the next date of hearing.

Plaintiff shall comply the order as provided under Order XXXIX Rule 3A of CPC.

Issue summons and notice about the order to the Defendants.

R/by 02.05.2026.

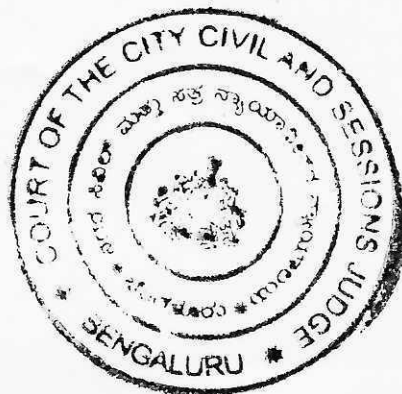
(Dictated to the Stenographer-III, transcribed by her, corrected and then pronounced by me in the open court, on this the 27th day of March, 2026).

[Signature]
sd/- 27/3/26

*Compliance affidavit
put up on 28/03/26
28/03*

(M. Anitha),
XVII Addl. City Civil & Sessions
Judge, Bengaluru.

*Addresses of D1 & D2
are not found in plaint
hence SS & notice & RT
not served to D1 & D2
& D12*



(13) (H5)

OS 2151/2026
CCH-16

Submitted
16/04/2026

Advocate for D. 1 & 2
filed an application with
affidavit, written statement,
Statement of truth, memo,
list of documents, vakalath
and wk copies to advance
file for the reasons that
the filing vakalath, w/s and
objections to IA No. 1
address the arguments on
IA No. 1.

Case advanced.

Sri. K.N.S.R, Advocate filed
vakalath for defendants No.1 and 2
along with written statement and
memo stating that they adopt the
written statement as objections to
IA No.1. Also filed another memo
along with certain documents.

Owing to the urgency pleaded
heard the arguments of Counsel for
defendants No.1 and 2 on IA No.1.

To hear further arguments of
Counsel for defendants No.1 and 2
on I.A No.1 by 17-04-2026..

put up for kind orders.

16/04/2026

XVII A.C.C & S.J., B'luru.

17-4-26
P.P.N
D.K.K.N.S.R.
D3/07 -
Toto Furpr...
b...2

Head
an.
ple
hile
Ent I.

Full against
Pg 1 & 2 Counsel
in I -
pay line for
life of agencies
21/4/26

21-4-26
P.P.N
D.K.K.N.S.R.
D3/07 -
Toto...

12/4/26



46

14

~~14~~

B 215/26

Counsel for defendants No.1 and 2 present.

Plaintiff absent. No representation.

Case called out again at 3.00 p.m.

Both the counsels present.

Counsel for plaintiff prays time.

Plaintiff side arguments on I.A No.1 finally by 23-04-2026.

[Handwritten signature]

XVII A.C.C & S.J., B'luru.

23-4-26

P.P.N

DIXIT KUNDE

D3707 -

TRAI by plaintiff

Counsel for defendants No.1 and 2 filed written notes of arguments along with rulings.

Plaintiff absent. No representation.

Case called out again at 11.40 a.m.

Counsel for plaintiff present.

Case called out again at 12.40 p.m.

Counsel for defendants filed memo along with certain documents and one Pen Drive.

Plaintiff absent. No representation.

Case called out again at 4.00 p.m.

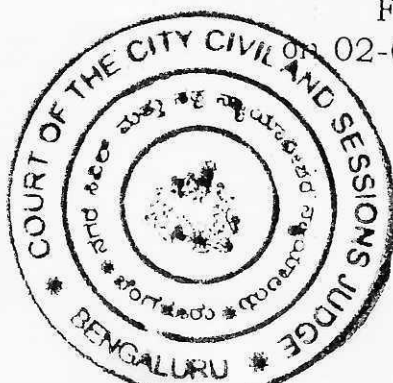
Heard the arguments of Counsel for plaintiff on I.A No.1 and reply arguments by the Counsel for defendants No.1 and 2.

Counsel for plaintiff filed memo along with rulings.

For orders by hearing date i.e. 02-05-2026.

[Handwritten signature]

XVII A.C.C & S.J., B'luru.



(177) (15) (15)

05 215/26

2-5-26

P.P.N
DUR-KNSR
D377-
Franchet

As the court engaged in the disposal of direction matters and the court passed orders in number of matters which stand posted for orders, the dictation on I.A.No.1 in the present case is not completed. Today is the last working day as from tomorrow there is Summer Vacation till the end of this month. Therefore, orders on I.A.No.1 is deferred and adjourned to 02.06.2026 and till then interim order is extended.

(Signature)

(M. Anitha),

XVII Addl. City Civil & Sessions Judge, Bengaluru.

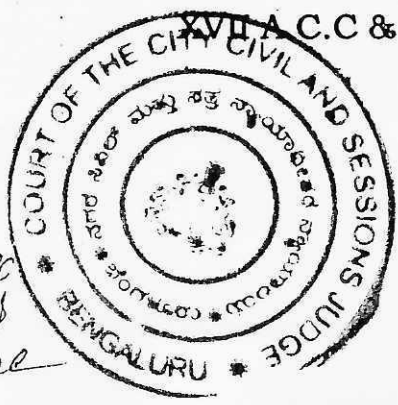
2-6-26

P.P.N
DUR-KNSR
D377 HSD
D7-MPLC
Franchet) D526 - NO 8...
D8 - ...
Court: ...

Sri. H.S.D, Advocate filed vakalath for defendant No.4.
Sri. M.P.K, Advocate filed vakalath for defendant No.7.
Call on 02-06-2026.

(Signature)

XVII A.C.C & S.J., B'luru.



(H8)

16

~~16~~

215/26

(Order pronounced in the open Court
vide separate Order)

ORDER

I.A.No.1 filed by the plaintiff
under order XXXIX Rule 1 and 2 r/w
Sec.94(d) and Sec.151 of C.P.C is
dismissed.

No order as to cost

2/6/26

XVII Addl. City Civil & Sessions
Judge, Bengaluru.

P.R.K. Advocate filed
vakaant for defendant No.5.

Summons to defendants No.5
and 6 returned unserved with
remarks "no such persons".

Summons to defendant No.8
served on office clerk and to
defendants No.10 and 11 served on
person. Called out absent. Service
held sufficient and thus placed ex-
parte.

Reissue SS and notice on I.A
No.1 to defendant No.9 and to take
fresh steps against defendants No.5
and 6 by 21-07-2026.

2/6/26

XVII A.C.C & S.J., B'luru.

15/6



(179)

FR. NO. 2111/2026

ANNEXURE - B

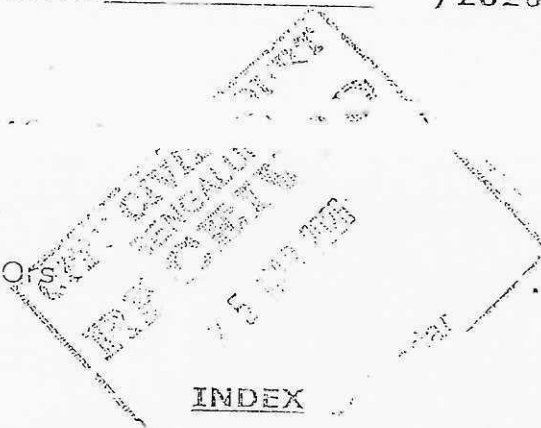
IN THE COURT OF THE HON'BLE PRINCIPAL CITY CIVIL AND
SESSIONS JUDGE, BANGALORE

O.S. No. 2151 /2026

BETWEEN:

AND:

SHU PRODUCTIONS & Ors. ... DEFENDANTS



INDEX

S.No.	PARTICULARS	PAGE No.
1.	Memorandum of Complaint under Order VII Rule 1 read with Section 26 of Code of	1-22
2.	Statement of Truth	23-26
3.	Index of Documents	25
4.	Document No.1 - Promotional Material of "Boss" Movie	26
5.	Document No.2 - The Teaser of "Boss" Movie produced in Pen Drive.	27
6.	Document No.3 - Videos of the Press meet held by the Defendant No.1 producer Rhanush Shivanna and Defendant No.2 Director Lava V and other promotional material and interviews in Pen Drive	27
7.	Document No.4 - Copies of the article regarding the "Boss" movie published in print media	28-33
8.	Document No.5 - Copy of the Notice sent to Defendant No.4	34-72
9.	Document No.6 - Copy of the Notice sent by the Defendant No.4	73
10.	Document No.7 - True copies of the orders of the Hon'ble High Court of Karnataka and Hon'ble District and Sessions Judge, Bengaluru	74-91
11.	Document No.8 - Office copy of the statutory notice issued to Defendant No.3	92-101

~~48~~ (50)

10.	Document No.9 – Speed Post receipts for issuance of Statutory Notice to Defendant No.3	132
11.	Document No.10 -Details of the certification issued to "Boss" movie by Defendant No.3	133-134
12.	Certificate Under Section 63 of BSA	135-136
13.	I.A No.1/2026 – Application under Order VI Rule 14(a) of the Code of CIVIL Procedure	24C
13.	I.A No.2/2026 -Application under Order XXXIX Rule 1 &2 read with Section 94(d) and Section 151 of the Code of Civil Procedure along with affidavit	139-145.
14.	Vakalathnama	
15	II-Set	

Place: Bengaluru

Date: 25.03.2026

Advocate for Plaintiff

51

1

BEFORE THE HON'BLE PRINCIPAL CITY CIVIL & SESSIONS
JUDGE AT BENGALURU

O.S. No. _____ / 2026

BETWEEN:

1. SRI.DARSHAN SRINIVAS,

Aged 49 years,
S/o Thoogu Deepa
Srinivas,
R/at #217, Thoogu
Deepa Nilaya, F-Road,
Ideal Home
Township,Rajarajeshwri
Nagar, Bengaluru,
Karnataka - 560098.

2. SMT.VIJAYALAKSHMI
DARSHAN,

Aged 43 years, W/o
Darshan Srinivas, R/at
#217, Thoogu Deepa
Nilaya, F-Road, Ideal
Home
Township,Rajarajeshwri
Nagar, Bengaluru,
Karnataka - 560098.

*That since Plaintiff No.1
is in Judicial custody,
Plaintiff No.2 being wife
is representing both the
Plaintiffs*

...PLAINTIFFS

AND:

1. SIRI

PRODUCTIONS (A
Partnership
Firm/Proprietorship
Concern),
Represented by
Producer Tanush S
office at No. [Specific
No. Unknown],
Bengaluru,
Karnataka- 560001
(GST No.:
29AIDPV1155E1Z8)

2. Laya V
Major

[Signature]

~~70~~

52

2

Having office at No.
[Specific No.
unknown]
Bengaluru, Karnataka

3. **CENTRAL BOARD
OF FILM
CERTIFICATION
(CBFC)** (Union of
India), Through its
Regional Officer, Shri
Yashwant Shehnai,
Kendriya Sadan, 'D'
Wing, 4th Floor, 17th
Main, Koramangala,
Bengaluru - 560034.

4. **KARNATAKA FILM
CHAMBER OF
COMMERCE (KFCC)**
Through its President,
Sri. Jayapradha, 28,
1st Main Road,
Crescent Road, High
Grounds, Bengaluru -
560001.

5. **META PLATFORMS,
INC. (FACEBOOK)**
Through its
Authorized Signatory,
1 Hacker Way, Menlo
Park, CA 94025, USA
(India Office: 15th
Floor, World Trade
Center, Brigade
Gateway,
Malleshwaram West,
Bengaluru - 560055).

6. **X CORP (formerly
Twitter)** Through its
Authorized Signatory,
1355 Market Street,
Suite 900, San
Francisco, CA 94103,
USA.
India Office: 9th
Floor, World Trade
Center, Brigade
Gateway,
Malleshwaram West,
Bengaluru - 560055

Yashwant Shehnai

#1 (53)

(2)

7. GOOGLE LLC
(YOUTUBE) Google
LLC, D/B/A YouTube
901 Cherry Ave
San Bruno, CA 94066
USA
Indian Local Address
& Grievance officer
Suraj Rao
Resident Grievance
Officer for YouTube
Google LLC - India
Liaison Office
Unit No. 26
The Executive Center,
Level 8, DLFCentre,
Sansad Marg,
Connaught Place,
New Delhi - 110001
E-Mail: ~~SUPPORT~~
~~INDIA@GOOGLE.COM~~

8. New Indian
Express
Having Registered
Corporate office at
Express Garden,
29, 2nd Main Road,
Ambattur Industrial
Area, Chennai-
600058,
Tamil Nadu.

Bengaluru Office at
No.1, Express
Building,
Opposite Institute of
Engineers, Queens
Road,
Bengaluru-560001
Represented by its
Editor.

9. Filmibeat
Greynium
Information
Technologies Pvt Ltd.
VRR Legacy No.2.
1st Main, 4th Floor, 1st
Block Koramangala,

Vijay Salun

#2 (54)

(4)

Jakkasandra
Extension
Bengaluru- 560034
Represented by its
Editor

10. **Tv9 Kannada**
Tv9 Karnataka Pvt Ltd
13/1 Rhenius street
Richmond Town
Bengaluru - 560025

11. **Zee Kannada News**
5th Floor, The
Landmark Building,
Next to Trinity Metro
Station, Mahatma
Gandhi Road,
Yellappa Chetty
Layout, Bengaluru
560042

12. **Ashok Kumar**

...DEFENDANTS

MEMORANDUM OF PLAINT UNDER ORDER VII RULE 1 READ
WITH SECTION 26 OF THE CODE OF CIVIL PROCEDURE, 1908

The Plaintiffs most respectfully submits as follows,

1. That the address of the Plaintiffs for the purposes of issuance of summons, notice, etc., from this Hon'ble Court is as stated in the cause title. The Plaintiffs may also be served through their Counsels Sri.Pratham N, Sri.Abhishek Ramesh, Sri.Gandavarapu Krishna Revanth, Vivek G B & Alok GS, Advocates, Office at No. 49, 4th Floor, ASVNV Bhavan, Kempegowda Road, Bengaluru-560009. [Email: arlawsharopedi@rediffmail.com].
2. That the addresses of the Defendant for similar purposes of issuance of summons, notice, etc., from this Hon'ble court is as stated in the cause title.

Vijay Dabur

73 (55)

(5)

3. It is submitted that the Plaintiff No.1 is a movie actor, producer and is known for playing as lead in numerous successful Kannada movies and the Plaintiff No.2 is the wife of Plaintiff No.1. That the Plaintiff No.1 has established his own identity, fame and name in the society, through his dedication and hard work and is recognised as one of the prominent members of the South Indian Cinema Industry.
4. It is submitted that the Plaintiff No.1 has not only been an actor but has contributed to the other crafts and art forms. It is necessary to understand the hard work that the Plaintiff No.1 has put to reach the position he currently holds, he has worked as a projectionist, raising to the ranks as assistant cameraman, playing minor roles in Television, working as dubbing artist for animations, working in advertising etc., as a consequence of his hard work and challenges faced by him during his journey in the movie industry. The Plaintiff No.1 has attained his stardom and has often been referred to as to as '*Challenging Star Darshan*', *Boss* & '*D Boss*' etc., by his fans and admirers. It is pertinent to note that the aforementioned names have been used synonymously with the Plaintiff No.1 name.
5. It is submitted that during October-November 2025, it had come to the knowledge of the Plaintiffs through her family and well-wishers that a movie was being produced by the Defendant No.1 represented by producer, Tanush S, who is also the lead actor. The said movie is based on the life of the Plaintiffs including the allegations of crime for which Plaintiff No.1 is currently undergoing trial and is in Judicial custody. As there was no substantial material to show that such movie was being produced, the Plaintiffs ignored the news as rumours.
6. Subsequently, the promotional materials such as the posters, advertisements on television news and articles of a movie, teaser produced by the Defendant No.1 were releasing one after another and these promotional material have been fuelling public speculation that the movie was based on the crime that the

Vijay Sarda

56

6

Plaintiff No.1 is currently under trial for and that the movie is based on the Plaintiff No.1 himself. The promotional material of the movie is herewith produced as **DOCUMENT NO.1**

7. It is submitted that the Plaintiffs aggrieved by the said movie currently under production titled "Boss" produced by the Defendant No.1 banner by Tanush S, Directed by Defendant No.2 - Lava V with Tanush S playing lead has approached this Hon'ble Court through the present suit.
8. It is submitted that on 09.03.2026 the Defendant No.1 released the teaser of the movie and after the release of the teaser, the Defendant No.2 Director and Defendant No.1 Tanush S, main lead and producer of the movie conducted a press meet with various Journalists. It is submitted that both the teaser and the press conference have been uploaded on various channels on Facebook, Instagram, Twitter and YouTube i.e., Defendant No.4 to 6. The teaser of the movie is produced as **DOCUMENT No.2** and the press meet, other promotional videos and interviews have been collectively produced as **DOCUMENT No.3** in the Pen Drive produced herewith.
9. That the audio and visuals of teaser of the movie are portrayed in such a manner that any normal viewer would associate the teaser to the life of the Plaintiffs and criminal case filed against the Plaintiff No.1.
10. It is submitted that on plain viewing of the trailer of the said movie, it can be seen that the premise of the movie is referring to killing of a person, the audio of a person requesting not to kill him as he has a pregnant wife at home and aged parents, the body being found next to a drainage pipeline, arrest of a celebrity, investigation regarding the killings, the movie having two female leads, and the fans of the lead actor in the movie referring to him as "boss", the incident in the movie occurring in Bengaluru, etc., all of which are similar to the incidents that have occurred as per the allegations made against the Plaintiffs and



#57

7

in the alleged chargesheet which is now pending before the Hon'ble Sessions Court Bangalore. The movie portraying all these incidents and showing them in the very first promotional video itself is not mere coincidence but a strategic plan to make money using the Plaintiffs' private life and reputation as a public personality.

11. It is also pertinent to note that the very first frame of the teaser clearly shows that the movie is inspired by true events and proceeds as stated supra to show lead actor being referred to as "boss".
12. It is further submitted that the Plaintiffs No.1 has himself the lead actor in the movie titled "Boss" released in the year 2011. It is important to note that the same name has been used for the present movie sought for injunction. The movie devolves around the plots and narration of the alleged incidents in the alleged chargesheet. The movie has been used for public exploitation of a private life of a celebrity who is well known across the geographies.
13. It is pertinent to note that the criminal case against the Plaintiffs No.1 regarding the incidents referenced in the Teaser and the movie is currently pending before the LVI Additional City Civil and Sessions Judge, Bengaluru in S.C No.1319 of 2024. Despite being aware of that the case is *sub judice*, the Respondent No.1 along with the Defendant No.2 have been producing a movie based on Plaintiffs' life and the alleged murder without obtaining any prior permission or providing any intimation or information to neither the Plaintiffs nor any other party/authorities.
14. It is imperative to note that aside from the publicly available news and information regarding the criminal case filed against the Plaintiff, there are a lot of misinformation, rumours and statements that are being made to tarnish the image of the



Plaintiffs and his family members, in all likelihood, a movie based on these sources would not only impact the on-going trial before the Hon'ble Sessions Court S.C No.1319 of 2024 but will impact the image and reputation of the Plaintiffs and his family members.

15. It is submitted that the Defendant No.2 has been giving interviews on numerous print and electronic media including the channels, website and pages of Defendant No. 8 to 11. The links with respect to the to the said teaser, press meet, interviews and other articles have been provided below for the reference of this Hon'ble Court:

Sl. No.	Title of the Article/Video	Name of the Platform Published on	Link
1.	Boss Teaser 4k	Youtube (Tanush Studios)	https://www.youtube.com/watch?v=9L_pM?si=hX581unary9LJw17
2.	Boss Movie film teaser launch press meet	Youtube (Chitralahari Mokshendra K.S)	https://www.youtube.com/watch?v=9L_pM?si=hX581unary9LJw17
3.	ದರ್ಶನ್ ಕೇಸ್ ನಡವಳಿ ಅಧಾರಿತ ಬಾಸ್ ಸಿನಿಮಾ ಮಾಧ್ಯಮ ಪ್ರಶ್ನೆಗಳಿಗೆ ಗಾಬರಿ ಆದ ಹೀರೋ ಹಾಗೂ ಡೈರೆಕ್ಟರ್	Youtube (Chitralahari Mokshendra K.S)	https://www.youtube.com/watch?v=9L_pM?si=hX581unary9LJw17
4.	Boss Teaser ದರ್ಶನ್ ರವರ ಒರಿಜಿನಲ್ ಕಥೆ ಇಡೀಯದು ಮಾಡಿದ ಸಿನಿಮಾನ..?	Instagram (Filmibeat Kannada)	https://www.instagram.com/reel/753486114380131
5.	BOSS Kannada Movie: ರೇಣುಕಾಸ್ವಾಮಿ ಕೊಲೆ ಕೇಸ್‌ಗೆ ಹೋಲಿಕೆ ಆಗಿದೆ ಬಾಸ್ ಸಿನಿಮಾದ ಪಾತ್ರಗಳು	Youtube (TV9 Kannada)	https://www.youtube.com/watch?v=9L_pM?si=hX581unary9LJw17
6.	BOSS Kannada Movie Thanush Shivanna ನಾನು ದರ್ಶನ್ ಅಭಿಮಾನಿನೇ	Facebook (Zee Kannada News)	https://www.facebook.com/reel/753486114380131

Uppas...

	ಅದಕ್ಕೂ ಇದಕ್ಕೂ ಸಂಬಂಧವಿಲ್ಲ		
7.	Renuka swamy ಕೇಸ್ ಅನ್ನೇ ಸಿನಿಮಾವಾಗಿ ಮಾಡಿದ್ದೀರಾ ಹೇಗೆ ?	Instagram (Southwood Talkies)	https://www.instagram.com/reel/CVn...
8.	BOSS Movie Director: ಬಾಸ್ ಸಿನಿಮಾದಲ್ಲಿ ರೇಣುಕಾಸ್ವಾಮಿ ಅಲ್ಲ ಶಿವನ್ಯಾಮಿ ಕೂಲೆ ಕೇಸ್ ಇದೆ ಎಂದ ಡೈರೆಕ್ಟರ್	Instagram (TV9 Kannada)	https://www.instagram.com/...
9.	Boss-2026	Filmibeats.com	https://www.filmibeats.com/kannada/movies/boss-2026.html
10.	"Boss" first look unveiled	BangaloreMirror	https://bangaloremirror.com/south-mirror/boss-first-look-unveiled/article/news/2025-05-2016-ams
11.	Boss teaser sparks Renukaswamy case debate; director dismisses connection	The New Indian Express	https://www.newindianexpress.com/entertainment/2026/May/16/bangalore-interview-2026-movie-features-revuesparks-case-debate-entertainment-2026-05-16/

The copies of the interviews/articles published on print and digital media regarding the movie is herewith produced as **DOCUMENT No.4.**

16. It is submitted that all the articles and videos regarding the movie have made direct comparison to the similarities with the crime alleged against the Plaintiff, the Defendant No.2 i.e., Director of the movie has denied any similarities.

17. It is further submitted that, the Karnataka Film Chamber of Commerce i.e., Defendant No.4, which is the apex body representing producers, directors and exhibitors has failed to enforce its code of conduct despite the actions of Defendant No.1

[Signature]

~~78~~ (60) (10)

violating the established provisions of law by making filings regarding the case currently under trial and violation of privacy of one of its own members. The Plaintiffs through their Advocates have issued a Notice to Defendant No.4 dated 18.03.2026 regarding the movie produced by the Defendant No.1. The Defendant No.4 in their reply dated 21.03.2026, have stated that the Defendant No.1 banner is not registered with them and the producer of the movie does not have membership with their organisation. The Office copy of the notice issued to Defendant No.4 and the reply sent by the Defendant No.4 is herewith produced as **DOCUMENT No.5 and 6.**

18. It is pertinent to bring to the notice of this Hon'ble Court, the Plaintiffs No.1 in the present case being a prominent personality, has approached the Hon'ble District courts and the Hon'ble High Court of Karnataka seeking to protect the reputation and privacy of himself and his family members, during the course of the Trial in the criminal case. The details of the suits filed by the Plaintiffs are as listed below:

Sl.No	Case/Writ Petition No.	Relief Granted	Date of Grant of the said relief
1.	O.S No.4267/2024	Interim order restraining unauthenticated/defamatory content with respect to personal or family life of Mr.Darshan Srinivas or investigation in Cr.No.250/2024	19.06.2024
2.	O.S No.6082/2024	Ex-parte ad-interim injunction restraining airing/printing/publishing statements on investigation charge sheet/FSL/confessions, debates or predictions on merits	27.08.2024
3.	W.P No.24836/2024	Interim order restraining of dissemination of chargesheet/confidential	10.09.2024

[Handwritten signature]

~~79~~ (61) (11)

		information; Ministry of Information & Broadcasting directed to act on violation of Cable Television Networks Rules, 1994	
4.	O.S No.7875/2024	Ad-interim injunction restraining unverified statements lowering image in print/TV/internet/social media, certified copies/relevant extracts.	11.11.2024
5.	W.P No.7473/2025	Filed against the Ministry of Information & Broadcasting	

19. It is submitted that based on the aforementioned suits and Writ petition filed by the Plaintiffs herein, the Hon'ble Courts were pleased to provide protection to the reputation and privacy of the Plaintiffs and his family members, by directing the media and any other third party from publishing, telecasting, distributing any unverified news, statements, claims etc., which may tarnish the image of the Plaintiff. The true copies of the Orders of the Hon'ble Court in aforementioned suits and Writ Petition have been collectively produced as **DOCUMENT NO.7**

20. It is submitted that despite taking all the necessary steps to protect the reputation and privacy of the Plaintiffs No.1 and his family, the movie "Boss" being produced by the Defendant No.1 and Directed by Defendant No.2 not only violates the privacy of the Plaintiffs No.1 but also of his wife and other family members and in all likelihood have impact on the on-going trial before the Sessions Court in S.C No.1319/2024.

21. It is submitted that under the guise of mere denial that the movie is not related to the Plaintiffs or the alleged crime, the Defendant No.1 and Defendant No.2 have violated the fundamental right to Privacy and personal liberty granted under Article 21 of the Constitution of India and the Defendant No.3 organisation has enabled the violation by providing certification to the movie.

Vijay Kumar

80

62

12

22. It is submitted that the Defendant No.1 have been publishing the posters, marketing material on print and other media, teaser, press meets, interviews to print and news media and making statements using the Plaintiffs name and fame to garner interest towards the film.
23. It is submitted that the Defendant No.2 has deliberately planned and edited the teaser to create a buzz among the public thereby leading to violation of Privacy of Plaintiffs and his family members. As stated supra, the alleged criminal case referred to in the teaser is currently pending before the Hon'ble Sessions court, Bengaluru, making films, documentaries or any media for wider public consumption would greatly impacts the public perception regarding the trial, the reputation of the Plaintiffs and consequently, the trial pending before the Sessions Court.
24. It is an established principle of law that "*A good reputation is an element of personal security and is protected by the Constitution equally with the right to the enjoyment of life, liberty and property*", hence the Fundamental Rights of the Plaintiffs required to be protected. It is further submitted that every person has a right to defend his reputation from being tarnished. It is submitted that the Plaintiffs have already being continuously targeted by the trolls, media and people trying to use the current situation to enrich themselves and gain limelight. It is submitted that in the current situation if the aforementioned movie is released, the same will cause irreparable damage to his privacy, his reputation, his image and leads to multiplicity of proceedings.
25. It is submitted that as a public personality and an actor, reputation and public perception are two of the most important factors that constitute the Plaintiffs No.1's professional standing and livelihood. In film industry, an individual's career is inextricably linked to their brand value and goodwill they have in public. Reputation for any individual is built over years of professional career but is fragile. Once reputation is damaged

Ujjwal

81 (63)

(13)

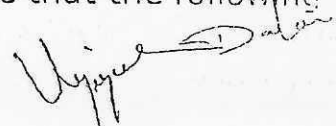
due to misinformation, incomplete information, the resulting damage is irreversible.

26. That the unauthorized use of Plaintiff No.1's personality, stardom to create content and sensationalize their own movie, not only causes personal distress but also results in irreparable damage which cannot be compensated monetarily. The Balance of convenience lies in favor of protecting the right to privacy and reputation of the Plaintiffs.

27. It is further submitted that as per the information made available on "FilmiBeat" handle, the Defendant No.2 has already obtained certification and is scheduled for release on 14.04.2026. The Defendant No.1 in all likelihood will release the movie in theatre and might sell, license or lease the rights of the movie to any other producer, production company or individual. Hence the Plaintiffs have filed the present petition against unknown defendants impleaded as "Ashok Kumar" who may release, publish, distribute or telecast the movie for or on behalf of the Defendant No.1.

28. It is submitted that the Plaintiffs have also issued a Statutory Notice under Section 10 of CPC on 13.03.2026 to Shri. Yashwant Shehnai, the Regional Officer of the Defendant No.3 under Section 5B of the Cinematograph Act read with Cinematograph Rules seeking to forthwith cease examination/refusal of certification. The office copy of the notice and the copy of the SPAD receipt are herewith produced as **DOCUMENT No.8** and **DOCUMENT No.9**.

29. It is submitted despite the aforementioned statutory notice, upon verifying the Website of the Defendant No.3 authority it has come to the attention of the Plaintiffs that the authority has illegally and arbitrarily granted certificate to the movie of the Defendant No.1 "Boss" on 17.03.2026 with certificate bearing No.DIL/7/33/2026-BAN. It is pertinent to note that the following



~~30~~ (BA) (14)

summary has been mentioned along with the certified which is reproduced for ease of reference of this Hon'ble Court:

Plot Summary

"The film's protagonist, a famous cricket player, has made a name for himself in the cricket world. One day a man repeatedly sends obscene messages and calls to his girlfriend. Angered by this Jeevan who works at her house and his friends find the man and beat him up mercilessly. The incident then takes many turns and revolves around the protagonist."

30. The copy of the details mentioned in the website of the Defendant No.3 with respect to the certification provided to movie "Boss" by the Defendant No.3 authority is herewith produced as **DOCUMENT No.10**.
31. It is submitted that the grant of the aforesaid certificate by Defendant No.3 is in complete disregard of the Plaintiffs' statutory notice, the prior protective orders passed by this Hon'ble Court and the Hon'ble High Court of Karnataka (produced as Document No.5), and the fact that the film is based on the private life of the Plaintiffs and the specific incidents forming the subject-matter of the ongoing trial in S.C. No.1319/2024 which is now pending before the Sessions Court, Bangalore. The certification has been granted without considering the gross violation of the Plaintiffs' fundamental rights under Article 21 of the Constitution of India, the principles of decency, morality, public order, and the prohibition against interference with pending judicial proceedings as mandated under Section 5B of the Cinematograph Act, 1952.
32. It is submitted that the Certificate No. DIL/7/33/2026-BAN dated 17.03.2026 is wholly illegal, arbitrary, mala fide, and without jurisdiction. The said certificate has been issued in violation of the mandatory guidelines framed under Section 5B of the Cinematograph Act, 1952, which expressly prohibit certification of any film that is likely to affect public order, decency, morality,

Vijay

or involves defamation or contempt of Court or is likely to interfere with the administration of justice in a pending criminal trial. The certification, therefore, deserves to be declared as null and void ab initio and cancelled by a decree of this Hon'ble Court.

33. It is submitted that the grant of the aforesaid illegal certificate constitutes a fresh and continuing cause of action in favour of the Plaintiffs. The Plaintiffs are now entitled not only to the permanent injunctions prayed for but also to a decree of declaration that the Certificate No. DIL/7/33/2026-BAN dated 17.03.2026 is illegal, null and void and a consequential decree for cancellation/revocation of the said certificate, thereby preventing any public exhibition, release, distribution or streaming of the movie "Boss" in any form whatsoever.

34. It is pertinent to note that, the Defendant No.2 has himself accepted that the said movie has relevance to the subject-matter contained in S.C. No.1319/2024 when asked by one of the journalists in the press meet aired on Zee Kannada News. The video is produced as one of the videos in DOCUMENT NO.3.

35. It is submitted that in the event the movie "BOSS" is permitted to be exhibited in cinema halls, multiplexes or theatres, it would cause immediate, widespread and irreparable harm to the Plaintiffs' reputation, privacy and right to fair on-going trial. The Plaintiffs are therefore entitled to a decree of permanent prohibitory injunction against all cinema halls, exhibitors and theatre owners from screening or exhibiting the said movie, so as to prevent any public exhibition pending final decision in the suit.

36. It is submitted that as the movie has already received the certification from the Defendant No.3 authority, Defendant No.1 and No.2 in all likelihood will release the movie in theatre, there is a possibility that the Defendant No.1 might release, sell, licence or lease the rights of the movie to any other producer,

[Handwritten signature]

84 (66)

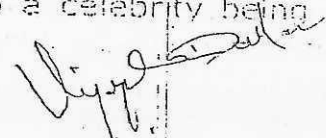
(16)

production company or individual. Hence the Plaintiffs has filed the present petition against unknow defendants impleaded as Ashok Kumar who may release, publish, distribute or telecast the movie for or on behalf of the Defendant No.1.

37. The cause of action arose during the month of October 2025 when the Defendant No.1 announced that they are producing a movie based on the incidents that had taken place in Plaintiffs life and continues as the Defendant has published marketing material such as posters, promotional interviews and teaser, the cause of action arose within the territorial jurisdiction of this Hon'ble Court and the Plaintiffs reside within the jurisdiction of this Hon'ble Court as such this Hon'ble Court has the jurisdiction to entertain the present proceedings.

38. It is submitted that the right to privacy is a fundamental right guaranteed under Article 21 of the Constitution of India, which includes within its ambit the right to informational privacy, protection of personal and family life, and the right to be left alone from unwarranted commercial exploitation and public scrutiny. The movie titled "Boss" and its promotional materials, by deliberately incorporating elements that unmistakably mirror the private life of the Plaintiffs, the specific incidents alleged in the pending criminal case, and the family circumstances of the Plaintiffs, constitute a gross invasion of this fundamental right to privacy and personal liberty without the consent or knowledge of the Plaintiffs.

39. It is submitted that every person, including a public figure, is entitled to protect his/her personality rights, which encompass the exclusive right to control the commercial use of his/her name, image, likeness, voice, persona, and any other attribute that is exclusively identified with him/her by the public. The Defendants have unauthorisedly appropriated the Plaintiffs' personality, the moniker "Boss" (which is having relevance with Plaintiff No.1's private life), the reference to a celebrity being



85 (69)

(17)

arrested, and other distinctive elements associated with Plaintiff No.1, solely for the purpose of commercial gain and sensational promotion of the film. Such misappropriation causes irreparable injury to the goodwill, brand value, and professional reputation of the Plaintiffs.

40. It is submitted that the production, promotion, and intended release of the film while the criminal case bearing S.C. No.1319/2024 is still pending and sub-judice before the LVI Additional City Civil and Sessions Judge, Bengaluru, amounts to a direct interference with the administration of justice and violates the Plaintiffs' fundamental right to a fair trial under Article 21 of the Constitution. Any dramatized depiction or reference to the very allegations under trial is bound to prejudice public perception, create a real risk of influencing the course of the on-going trial, and cause grave miscarriage of justice, which cannot be remedied after the film is released or exhibited.

41. It is submitted that even if the Defendants No.1 & 2 claim the film to be a work of fiction, the unmistakable references to the Plaintiffs' life, the specific facts of the pending criminal case, and the portrayal of events in a manner that places the Plaintiffs in a false and defamatory light before the general public, constitute actionable civil wrong and any prudent persons can come to a conclusion that the said teaser of the movie depicts the personal life of the Plaintiffs. The teaser, press meet, and promotional interviews have already triggered widespread speculation and comparison with the Plaintiffs' life, thereby lowering the reputation of the Plaintiffs in the eyes of the society and causing continuous and irreparable harm to their dignity and standing.

42. It is submitted that while freedom of speech and expression is a cherished constitutional value, the same is not absolute and is subject to reasonable restrictions in the interest of decency, defamation, and contempt of court. In the present case, the

Ujjwal Dabur

86

68

18

Defendants' commercial venture, which seeks to exploit the Plaintiffs' ongoing personal tragedy and sub-judice trial for unjust enrichment, profit and publicity, cannot be permitted to override the Plaintiffs' fundamental rights to privacy, reputation, and fair trial. The balance tilts decisively in favour of granting protection to the Plaintiffs, as any post-release remedy would be inadequate and the damage would be irreversible.

43. It is submitted that the cause of action to institute the present suit first arose in the month of October 2025, when the Plaintiffs came to know through reliable sources, family members, and well-wishers that Defendant No.1 was producing a movie under the title "BOSS" based on the life events of the Plaintiffs, including the specific incidents forming the subject matter of the sub-judice criminal case in S.C. No.1319/2024 pending before the LVI Additional City Civil and Sessions Judge, Bengaluru. The cause of action further accrued and crystallized on 09.03.2026, upon the release of the teaser of the said movie by Defendant No.1, which openly proclaimed that the film was "inspired by true events" and contained audio-visual elements unmistakably referring to the Plaintiffs' private life, family circumstances, the alleged crime, arrest of a celebrity, and other distinctive facts associated with Plaintiff No.1. The cause of action further arose when the Plaintiffs sent a statutory Notice u/s 10 of CPC to CBFC on 13.03.2026 seeking non-clearance/registration of the title "Boss". The cause of action further arose when the certificate was issued by the CBFC on 17.03.2026 and declaring the date of release to be 14.04.2026. The cause of action is continuing in nature, as Defendant No.1 has continued to promote the movie through posters, advertisements on television and news channels, press meets, interviews by the Defendant No.2, and dissemination of the teaser, trailer, and related promotional materials on the digital platforms of Defendants. No.5 to 7. (Facebook/Instagram, X Corp, and YouTube), all of which are accessible and cause fresh harm within the territorial jurisdiction of this Hon'ble Court on a daily basis.

~~87~~ 69

19

44. The fact that the certificate has already been issued by the CBFC and the imminent threat of theatrical release, streaming, distribution, or transfer of rights to third parties (including unknown persons like Defendant No.12) further perpetuate the cause of action. The Plaintiffs reside within the jurisdiction of this Hon'ble Court, the impugned acts (including publication, promotion, and potential exhibition of the film) have taken place and continue to take place within Bengaluru, and the harm to the Plaintiffs' reputation, privacy, and right to fair on-going trial is felt and materialized here. Accordingly, this Hon'ble Court has the territorial and pecuniary jurisdiction to entertain and try the present suit.

45. It is further submitted that no part of the cause of action is barred by limitation, as the acts complained of are recent, continuing, and fresh instances of invasion of privacy, misappropriation of personality rights, and interference with sub-judice proceedings are occurring even as of the date of filing of this suit. The Plaintiffs have been vigilantly protecting their rights through prior proceedings (as detailed in paragraph 18 supra), and the present suit is filed promptly upon the CBFC issuing certificate, discovery of the teaser release and promotional activities that directly violate those protections.

46. The Plaintiffs seek leave of this Hon'ble Court to bring on record the relevant information, documents, array necessary parties and amend the plaint, if necessary, after filing the above suit and reserves the right to do the needful. The suit is valued as per the valuation slip annexed to the Plaint and the same has been paid in terms of the provisions of the Karnataka Court Fees & Suit Valuation Act, 1958.

Vijay Salun

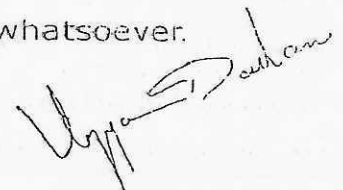
~~28~~ (70)

(20)

PRAYER

Wherefore, it is most respectfully prayed that this Hon'ble Court be pleased to pass judgment and decree,

- a. Granting perpetual prohibitor injunction restraining the Defendant No.1 and Defendant No.2, its producers, directors, Lava V, lead actor Tanush S, their representatives, associates, servants, agents, employees, men or anyone claiming through or under them, from in any manner producing, filming, editing, promoting, marketing, releasing, distributing, exhibiting, telecasting, streaming, selling, licensing, leasing, or dealing with the movie titled "BOSS" (or any other movie / film / web-series / content by whatever name called) based on or depicts the life of the Plaintiffs, the incidents alleged in the criminal case pending in S.C. No.1319 of 2024 before the LVI Additional City Civil and Sessions Judge, Bengaluru, or any elements directly or indirectly referring to or associating with the Plaintiffs' private life, family, reputation, the sub-judice criminal proceedings or any other similar incidents, and from using the Plaintiffs' name, image, likeness, personality rights, or any promotional material (posters, teasers, trailers, press meets, interviews, etc.) in any medium whatsoever.
- b. Declare that the Certificate No. DIL/7/33/2026-BAN dated 17.03.2026 issued by Defendant No.3 (Central Board of Film Certification) in favour of the movie "BOSS" is illegal, arbitrary, mala fide, null and void ab initio and contrary to the provisions of Section 5B of the Cinematograph Act, 1952 and the fundamental rights of the Plaintiffs under Article 21 of the Constitution of India.
- c. Cancelling/revoking of the Certificate No.DIL/7/33/2026-BAN dated 17.03.2026 and directing Defendant No.3 (CBFC) to forthwith withdraw, cancel and recall the said certificate and not to permit any public exhibition, release, distribution, streaming or exhibition of the movie "Boss" in any form whatsoever.



89 (71)

(21)

- d. Directing Defendant No.3 (Central Board of Film Certification) to forthwith cease and desist from examining, processing or granting any further certification (or re-certification) to the movie titled "Boss" or any such movie/content as described in prayer (a) above and to refuse certification in exercise of powers under Section 5B of the Cinematograph Act, 1952 read with the Cinematograph (Certification) Rules, 2024.
- e. Granting perpetual prohibitory injunction restraining the Defendants No.5 to 7 (Facebook, Instagram, Twitter/X, YouTube and their affiliates) from uploading, hosting, streaming, promoting, sharing, or in any manner allowing circulation of the teaser, trailer, press meet videos, posters, promotional interviews, or any other material related to the said movie "BOSS" that depicts or refers to the Plaintiffs' life or the sub-judice criminal case, and directing them to immediately remove / block all such existing content from their platforms.
- f. Grant perpetual prohibitory injunction restraining the Defendant No.8 to 11 herein or anybody claiming under him/them from broadcasting/ telecasting/ transmitting / publishing/ distributing/ sharing any material in permanent/ transient/ audio format in any print media/ newspaper/ television channels/ local cable operated channels/ internet/ website, uploading, hosting, streaming, promoting, sharing, or in any manner allowing circulation of the teaser, trailer, press meet videos, posters, promotional interviews, or any other material related to the said movie "BOSS" that depicts or refers to the Plaintiffs' life or the sub-judice criminal case, and directing them to immediately remove / block all such existing content from their platforms.
- g. Granting perpetual prohibitory injunction against the unknown Defendants (impleaded as Defendant No.12 Ashok Kumar) including but not limited to cinema halls, multiplexes, theatres, exhibitors, distributors, owners, managers, agents, servants,

Vijaya Sathyan

90 (72) (21)

employees or any person(s) claiming through or under them, from in any manner exhibiting, screening, showing or permitting the public exhibition of the movie titled "BOSS" in any theatre, cinema hall, multiplex or public place whatsoever within the jurisdiction of this Hon'ble Court or throughout the territory of India, pending final adjudication or until further orders. From releasing, publishing, distributing, telecasting, streaming, selling, licensing, leasing, exhibiting, or dealing with the movie "BOSS" or its rights in any manner or in any medium whatsoever on behalf of or for the benefit of Defendant No.1 or any other person.

- h. Direct the Defendant No.1 and Defendant No.2 to pay to the Plaintiffs for violating the Plaintiffs right to privacy and personal liberty, infringement of his personality rights, mental agony, trauma, distress caused to the Plaintiffs and their family members due to the unauthorized and sensational portrayal in promotional material of their movie "Boss"
- i. Award cost of the suit and all incidental costs to the Plaintiffs
- j. Grant such other reliefs as this Hon'ble Court may deem fit and proper in the facts and circumstances of the present case.

Advocate for Plaintiffs

Place: Bengaluru

Date: 25.03.2026

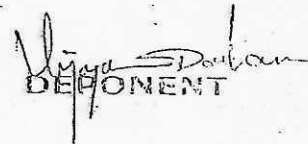

Plaintiffs

VERIFICATION

I, the deponent herein, do hereby declare that what is stated above in the Plaint at paragraph no.1 to 46 are true and correct to the best of my knowledge, information, and belief.

Place: Bengaluru

Date: 25.03.2026


DEPONENT

73 23

BEFORE THE HON'BLE PRINCIPAL CITY CIVIL & SESSIONS
JUDGE AT BENGALURU
O.S. No. _____ / 2026

BETWEEN:

Darshan Srinivas & Anr

... Plaintiffs

AND:

Siri Productions & Ors

...Defendants

STATEMENT OF TRUTH

I, Smt.Vijayalakshmi Darshan, W/o. Mr.Darshan Srinivas Aged about 43 Years, having address at: #217, Thoogu Deepa Nilaya, F-Road, Ideal Home Township, Rajarajeshwri Nagar, Bengaluru, Karnataka - 560098, do hereby solemnly affirm and state on oath as follows:

1. I am the Plaintiff No.2 in the above Suit and I am the wife of Plaintiff No.1, Since the Plaintiff No.1 is in judicial custody, I am competent to swear this Affidavit for myself and on behalf of the Plaintiff No.1.
2. I am sufficiently conversant with the facts of the case and have also examined all the relevant documents and records in relation thereto.
3. I say that the statements made in paragraphs No.01 to 34 are true to my knowledge, and statements made in paragraphs No.35 to 46 are based on legal advice.
4. I say that there is no false statement or concealment of any material fact, document or record and I have included information that is according to me relevant for the present suit.
5. I say that all the documents in my power, possession, control or custody, pertaining to the facts and circumstances of the proceedings initiated by me have been disclosed and copies thereof annexed with the Plaint, and that I do not have any other documents in my power, possession, control or custody.

Vijayalakshmi Darshan

72 (7H) (24)

6. I say that the above-mentioned pleading comprises of a total of 29 pages, each of which has been duly signed by me.
7. I state that the Document No.1, 4, 8 and 10 are printouts of online material, Document No.5, 6, 7, 8, 9 are true copies of original and Documents No.2 & 3 are copies of the videos downloaded and produced in pen drive have been referred to and relied upon by the Plaintiff.
8. I say that I am aware that for any false statement or concealment, I shall be liable for action taken against me under the law for the time being in force.

Place: Bengaluru
Date: 25.03.2026


Deponent

VERIFICATION

I, the deponent herein, do hereby declare that the statements made herein above are true and correct to the best of my knowledge, belief and information.

Identified by me

Advocate
Place: Bengaluru
Date: 25.03.2026


Deponent

93 (75) (25)

IN THE COURT OF THE HON'BLE PRINCIPAL CITY CIVIL AND
SESSIONS JUDGE, BANGALORE

O.S. No. _____ /2026

BETWEEN:

SRI. DARSHAN SRINIVAS & Anr.

.... PLAINTIFFS

AND:

SRI PRODUCTIONS & Ors

... DEFENDANTS

LIST OF DOCUMENTS

Sl.No.	PARTICULARS	PAGE No.
1.	Document No.1 – Promotional Material of "Boss" Movie	26
2.	Document No.2 – The Teaser of "Boss" Movie produced in Pen Drive.	27
3.	Document No.3 – Videos of the Press meet held by the Defendant No.1 producer Thanush Shivanna and Defendant No.2 Director Lava V and other promotional material and interviews in Pen Drive	27
4.	Document No.4 - Copies of the article regarding the "Boss" movie published in print media	28-33
5.	Document No.5 – Copy of the Notice sent to Defendant No.4	34-72
6.	Document No.6 -Copy of reply sent by the Defendant No.4	73
7.	Document No.7 – True Copies of the orders of the Hon'ble High Court of Karnataka and Hon'ble District and Sessions Judge, Bengaluru	74-91
8.	Document No.8 – Office copy of the statutory notice issued to Defendant No.3	92-131
9.	Document No.9 – Speed Post receipts for issuance of Statutory Notice to Defendant No.3	132
10.	Document No.10 -Details of the certification issued to "Boss" movie by Defendant No.3	133-134

Place: Bengaluru

Date: 25.03.2026

Advocate for Plaintiff

76

DOCUMENT No. 1



~~45~~ (77)

(27)

DOCUMENT 102
& DOCUMENT No. 2

PP

Search for Movies and Celebrities

- TV
- Movies
- Tamil
- Telugu
- Kannada
- Malayalam
- Trending
- Egg Boss
- Bollywood
- Hollywood
- Tamil
- Telugu
- Malayalam
- Kannada
- Celebs
- Top Listing
- Upcoming Movies
- Web Series
- Box Office

Home > Kannada > Movies > Boss-2026 > Story

Language
Kannada

- Discover Stories
- Upcoming Telugu Movies
- Upcoming Bollywood Movies
- Upcoming Hindi Movies
- Celebrity Birthdays Today
- Latest OTT Releases
- Upcoming Web Series
- Today's TV Schedule

Overview Cast & Crew Story OTT Fan Photos

Story

Boss-2026 is an upcoming Kannada murder mystery drama written and directed by V. Lava. The film stars Anushka Shivanna, Payal Chengappa, and Vandita in the lead roles. With an intense premise, the film promises to explore themes of crime, fame, and the influence of politics in Kannada.

Story


The film revolves around a celebrity who commits a shocking murder. As the investigation progresses, he becomes entangled in a complex web of political power, manipulation, and hidden motives, turning the case into a gripping murder mystery.

Controversy

The film sparked controversy after its teaser release, with some viewers pointing out similarities to the Anuswaswamy murder case, which had links to Kannada actor Darshan. However, director V. Lava, a lawyer-turned-filmmaker, clarified that the movie is not based on the Darshan case or any specific incident. He explained that the story is purely fictional and only inspired by several societal events that occurred during 2024-2025, firmly denying any direct connection to the Anuswaswamy case.

Note: Hello! Would you like to share the storyline of the movie Boss-2026 or provide updates on the cast and crew with us? Kindly send your contributions to news@filmibeat.com.

Movies in Spotlight



99 (79) (29)

Top Stories

- 1. [\[Faded Title\]](#)
- 2. [\[Faded Title\]](#)
- 3. [\[Faded Title\]](#)
- 4. [\[Faded Title\]](#)
- 5. [\[Faded Title\]](#)
- 6. [\[Faded Title\]](#)
- 7. [\[Faded Title\]](#)
- 8. [\[Faded Title\]](#)
- 9. [\[Faded Title\]](#)
- 10. [\[Faded Title\]](#)


[View All Stories](#)

Latest Releases


- Mango Pashcha**
🕒 20 Mar 2026
- Love Mohabbat 3**
🕒 19 Mar 2026
- Jayashikha**
🕒 6 Mar 2026
- Mayagadva**
🕒 27 Feb 2026
- Alpha**
🕒 20 Feb 2026
- Seetha Payana**

[Latest Releases](#)

Top Listing



Love Mohabbat 3
🕒 19 Mar 2026



Alpha
🕒 20 Feb 2026

[View All Listing](#)

The images featured on this page are sourced from publicly available platforms, official press releases, and other public materials. These images are published strictly for editorial, informational, and news reporting purposes under the principles of fair use.

We do not claim ownership of any images unless explicitly stated. All image copyrights belong to their respective photographers, production houses, or copyright holders.

If you are the rightful owner of any image and believe that its use on this website is unauthorized or inappropriate, please contact us (popcorn@oneindia.co.in) with proper details. We will promptly review and remove the content if required.

98 80

Bangalore Mirror

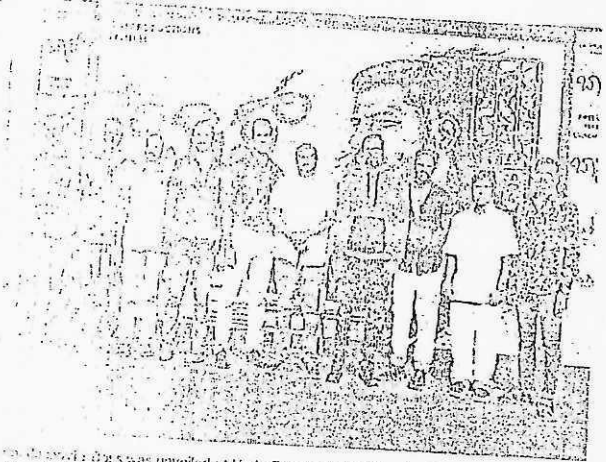
SIGN IN

Home | Bangalore Mirror | PUNE MIRROR

Home | Bangalore Mirror | Entertainment | Videos | Photos | Sports | News | Opinion | Lok Sabha Elections | Coronavirus

'Boss' first look unveiled
By P. Lakshmi | Updated: Mar 13, 2021, 06:00 IST

Share
Print
Email
WhatsApp
Facebook
Twitter
LinkedIn
Pinterest



The first look of the movie 'Boss' was unveiled at Hyde Park Hotel on Monday. The team expressed excitement over the positive response from moviegoers. The crime thriller is supported by Anil P under the banner of...
I am very happy with the positive response for the first look of this movie. I am very happy with the hardwork and commitment of the cast and crew during the shooting," said director Lava V.
The movie also features...
...and Lakshman Poolari.

Aero India 2021: 13th edition of air show begins today

(Pedestrians Only)

PM lays foundation stone of new Parliament building

Based on before posting your Review
Rate this movie

Add your comment here

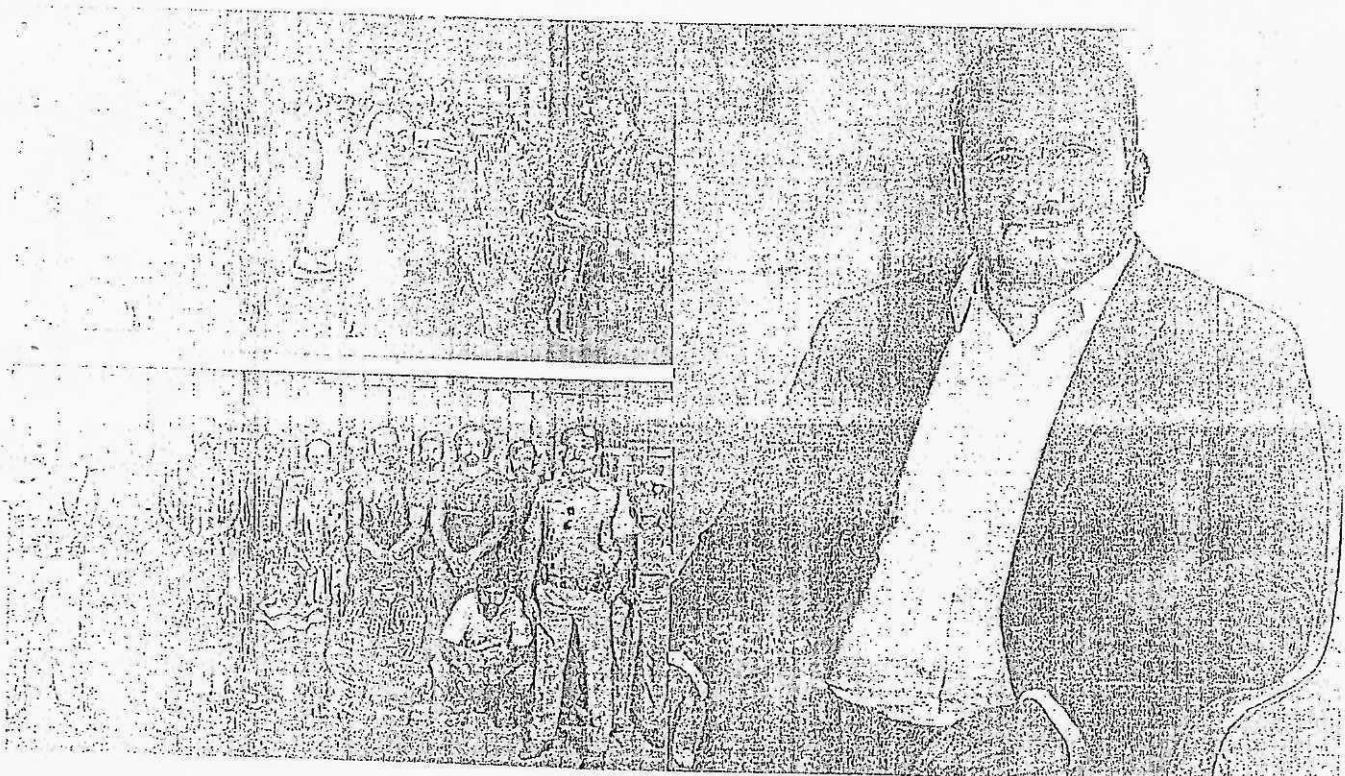
99

81

31

Boss teaser sparks Renukaswamy case debate; Director dismisses connection

The film stars Thanush Shivanna in the lead, with Vanditha and Payal Chengappa playing the female leads



The film stars Manushi Sinivania in the lead, with Vandana and Payal Chengappa playing the female leads. With the real-life case still under trial, the teaser's resemblance to certain events has naturally raised questions about whether the film risks stepping into legally sensitive territory.

Director Lava V, who is also an advocate by profession, denies any direct connection, "Yes, I know the case is currently being tried. However, where is the comparison? The placement, the locations — everything in our film is different," he says, adding that he is prepared for scrutiny. "Let the Censor Board watch the film and decide. I have applied, and waiting to know their remarks for the film. If required, I am prepared to appeal."

Lava maintains that the similarities viewers are pointing out are purely coincidental. According to him, *Boss* draws from a range of incidents that occurred in society between 2024 and 2025 and builds a fictional crime thriller around them.

"I know that making a film directly about a case under trial can amount to contempt of court. We did not want to take that risk, and we have not touched any real-life case. But in a crime thriller, certain situations can resemble incidents that have happened somewhere," he argues.

As for the title *Boss*, which many believe carries its own associations, Lava says the choice was purely creative. "In the film, the actor plays a celebrity who is popularly called 'Boss'. It's an attractive title, and we felt it suited the character."

Jr NTR charms Bengaluru fans with Kannada speech: 'Coming to Karnataka feels like visiting my mother's home'

Still, with its teaser already stirring debate and curiosity, *Boss* has placed itself right at the intersection of cinema, controversy, and public intrigue, long before it reaches theatres.

Boss is produced by Anil Gundigekere under the Siri Productions banner. The film's music is composed by Davy Suresh, with cinematography by Sharath IR Pura and editing by Mahesh D. 11

TOP 83 33

Share

Share your thoughts...

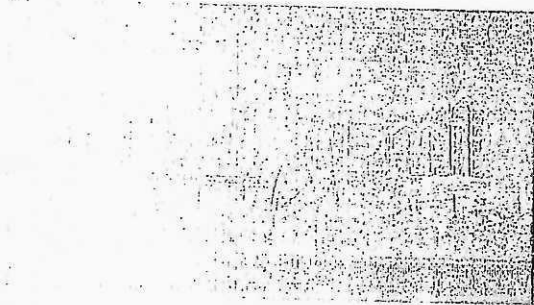
This site is protected by reCAPTCHA and the Google [Privacy Policy](#) and [Terms of Service](#) apply.

POST

Terms Privacy Policy

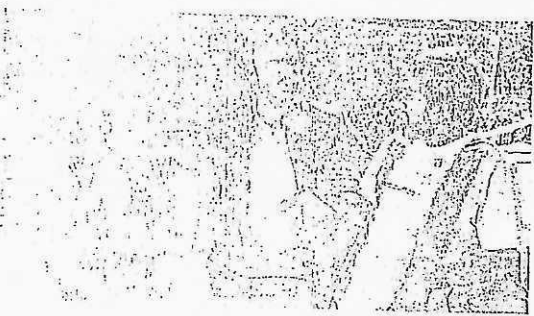
Powered by melyne

Related Stories



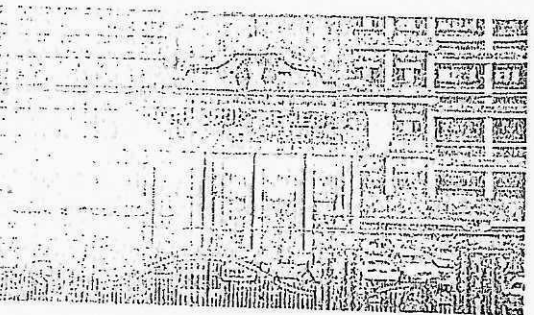
Tovino Thomas-starrer Pailichattambi gets a new release date, teaser on the way

CE Features · 14 hours ago



'Every character moves the narrative in Super Hit'

A Sharadhaa · 26 Feb 2026



Pleas against 'The Kerala Story 2' premature, misconceived: Producer to Kerala HC

PTI · 25 Feb 2026



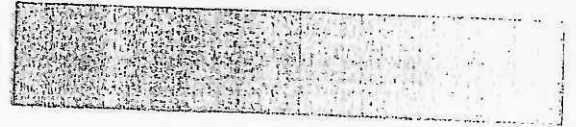
Shine Sharsh Shetty turns producer with Shankarabharana

A Sharadhaa · 17 Feb 2026

DHEE Inc.

ADVOCATES & SOLICITORS

#29 (SH) (SH)



DOCUMENT

BY REGISTERED POST A.D. / SPEED POST WITH
ACKNOWLEDGEMENT DUE (AND BY ELECTRONIC MAIL
WHEREVER OFFICIAL EMAIL IS AVAILABLE)

Date: 17 March 2026

To,
SMT. JAYAMALA
The Hon'ble President & Secretary,
Karnataka Film Chamber of Commerce,
No. 28, 1st Main, Crescent Road,
Next to Gururaja Kalyana Mantapa & Shivananda Circle,
High Grounds, Bengaluru, Karnataka - 560 001.

SUBJECT: Humble Requisition and Detailed Representation seeking (i) non-clearance / refusal of the title "BOSS", (ii) non-issuance or non-processing of any distribution licence, exhibition permission or allied approvals under the Karnataka Cinemas (Regulation) Act, 1964 and Rules thereunder, and (iii) a kind direction to the producers to forthwith surrender and submit to your esteemed Chamber the complete teaser, all banners, posters, trailers, stills and every piece of promotional material already created or released, pending final consideration - in respect of the proposed Kannada feature film "BOSS" (Siri Productions, Director: V. Lava, Lead: Tanush Shivanna) - on grounds of sensitivity to ongoing sub judice proceedings, protection of fair trial rights, privacy under Article 21, and larger interests of the Kannada film fraternity.

Most Respected Madam,

We act for and on behalf of our client, **Mr. Darshan Srinivas** (also known as Darshan Thoogudeepa Srinivas, "Challenging Star Darshan" or "D Boss"), aged about 47 years, son of Late Thoogudeepa Srinivas, residing at #217, Thoogu Deepa Nilaya, F-Road, Ideal Home Township, Rajarajeshwari Nagar, Bengaluru - 560 098 (hereinafter "our Client").

1001, 4th floor, Brigade Plaza, Arundhaty Circle, Bangalore - 560007
Contact: 9397054064, 9866006514, 8095882256
Email ID: dheerincorporated@gmail.com

At the outset, we place on record our Client's profound respect, gratitude and emotional attachment to the Kannada film industry and your esteemed Chamber. Our Client's late father, Thoogudeepa Srinivas – a veteran actor, who served the Kannada Industry for nearly three decades. Our Client himself has carried forward this legacy since the early 2000s, having starred in over 50 films as a leading actor and producer, earning the affection of millions of fans and the respect of peers across generations. Together, father and son have been part of this fraternity for well over 50 years, always upholding the values of discipline, camaraderie and contribution to Kannada cinema. It is with immense reluctance, a heavy heart, and deep personal anguish that our Client approaches your good offices today. We repose complete faith in your Chamber's wisdom, fairness, and time-honoured tradition of safeguarding the interests of artistes, especially in times of personal distress and legal sensitivity.

1. Ongoing Sub Judge Criminal Trial – Detailed Background Our Client stands arraigned as Accused No. 2 in Crime No. 0250/2024 (commonly referred to as the Renukaswamy murder case), registered on 09.06.2024 at Kamakshipalya Police Station, Bengaluru, initially under Sections 302 and 201 of the Indian Penal Code (now corresponding provisions of the Bharatiya Nyaya Sanhita). The charge-sheet was filed on or before 04.09.2024, charges were formally framed on or about 03.11.2024, and the trial is actively proceeding on a day-to-day basis before the competent Sessions Court, Bengaluru. Key stages include ongoing evidence recording, with depositions from the victim's parents having taken place in December 2025 and further proceedings continuing as of March 2026. The matter involves grave and sensitive allegations, yet the presumption of innocence remains sacrosanct under law, and the trial demands an atmosphere free from external prejudice or sensationalism.
2. Protective Judicial Orders Already in Place- Recognizing the potential for media trial and invasion of privacy, multiple courts have granted restraining orders to safeguard our Client's fundamental rights under Article 21 (right to life, dignity, privacy and fair trial):
 - o O.S. No. 4267/2024 (filed by Client's wife): Interim order dated 19.06.2024 restraining unauthenticated or

~~104~~

80

36

defamatory content related to personal/family life or the investigation.

- o O.S. No. 6082/2024: Ex-parte ad-interim injunction dated 27.08.2024 (communicated 28.08.2024) prohibiting publication of statements on investigation details, charge-sheet, FSL reports, confessions, debates or predictions on merits.
 - o W.P. No. 24836/2024 (High Court of Karnataka): Interim order dated 10.09.2024 restraining dissemination of charge-sheet or confidential information, with directions to the Ministry of Information & Broadcasting.
 - o O.S. No. 7875/2024: Ad-interim injunction dated 11.11.2024 restraining unverified statements lowering image across print, TV, internet and social media.
 - o W.P. No. 7473/2025 against the Ministry of Information & Broadcasting. Certified copies / relevant extracts are enclosed as **Annexure-A series** for your kind perusal.
3. Details of the Proposed Film "BOSS" and Promotional Content
- Our Client's family has recently become aware, through public sources and media reports, of a forthcoming Kannada feature film titled "BOSS" under the Siri Productions banner (produced by Anil Gudigekere, written and directed by V. Lava – a qualified advocate – with lead actor Tanush Shivanna, and supporting roles by Payal Chengappa and Vandita). The teaser was publicly unveiled/launched around 09.03.2026 amid a press meet, with a tentative theatrical release proposed for 14.04.2026. The teaser (approximately 2-3 minutes in duration) and associated promotional materials (banners, posters, interviews, press footage) include the following striking elements:
- o A central celebrity figure nicknamed "Boss" (with fans addressing him as such) depicted in a narrative involving the killing of a fan/follower.
 - o Visual and thematic similarities in the portrayal of the victim and circumstances leading to the incident.
 - o Scenes of arrest, police investigation, interrogation, and claims of innocence, all set against a Bengaluru backdrop.
 - o An explicit opening disclaimer stating "Inspired by true events". Public discourse – including media articles,

social media reactions, viewer comments and trending discussions post-teaser release - has widely interpreted the film as drawing direct inspiration from, or capitalizing on, the facts and publicity surrounding Crime No. 0250/2024. Director V. Lava has publicly acknowledged in interviews (March 2026) that the storyline draws from real societal events of 2024-2025 and the ongoing trial, while expressing willingness to defend any legal challenge. Relevant teaser video (4K format), press-meet excerpts, promotional articles/interviews and sample public reactions are enclosed as **Annexure-B series** for your esteemed Chamber's careful examination.

4. Role of Your Esteemed Chamber and Link to Statutory Framework Your Chamber has long been the apex recognised industry body for title registration, clearance and dispute resolution in the Kannada film sector. Producers routinely seek and obtain title clearance / No Objection from KFCC before proceeding to production, distribution or exhibition. It is pertinent to state that similar requisition has been made to the Deputy Commissioner, Bengaluru seeking the relief not to issue License for film exhibition. Proceeding with clearance or facilitation in the face of these grave sensitivities could inadvertently contravene free and fair trial, public policy, judicial restraints, and the larger interest of maintaining decorum in the industry.
5. Humble Requisition - Grounds and Prayer: In light of the above - particularly the ongoing day-to-day trial, multiple protective court orders, potential for prejudice to fair trial rights, invasion of privacy/dignity under Article 21, and the emotional toll on our Client's family - we most respectfully implore your esteemed Chamber to extend its benevolent intervention.

WHEREFORE our Client humbly and earnestly prays that your esteemed Chamber may be pleased to:

- a. Kindly grant non-clearance / refuse registration or clearance of the title "BOSS" and reject any pending or forthcoming application in that regard;
- b. Kindly refrain from issuing, processing or facilitating any distribution licence, exhibition permission, theatre booking



#88

88



approval or allied sanction under the Karnataka Cinemas (Regulation) Act, 1964 or otherwise in respect of the proposed film "BOSS", pending full and final consideration of this requisition;

c. Kindly direct the producers of the film "BOSS" (Siri Productions / Anil Gudigekere / V. Lava and all associated entities) to forthwith surrender and submit to your esteemed Chamber - in physical or digital form as appropriate - the complete teaser, all banners, posters, trailers, stills and every piece of promotional material already created or released (including any variants or additional content), pending final consideration and decision on this requisition, so as to enable your Chamber to independently examine the content, assess its implications, and arrive at an informed and equitable view in the best interests of justice, fraternity and public sensitivity.

We are fully confident that your Chamber - which has steadfastly protected the dignity of artistes, resolved disputes with equity, and upheld the cultural sanctity of Kannada cinema for decades - will extend its compassionate and judicious hand in this matter of profound personal and professional significance to our Client. Your kind intervention at this juncture would be seen as an act of true guardianship and would earn the everlasting gratitude of our Client and his family.

This requisition is submitted with the deepest respect and without prejudice to our Client's rights and contentions in the pending criminal and civil proceedings.

We shall be most obliged if you could kindly acknowledge receipt and communicate the action taken at the earliest convenience.

Yours most respectfully and gratefully,


PRATHAM N
Advocate,

For DHEE Inc. Advocates & Solicitors

Enclosures:

~~107~~ (89) (39)

- Annexure – A Series: Certified copies/extracts of protective court orders.
- Annexure – B Series: Teaser (DVD/USB/4K link), promotional materials, press meet video, articles/interviews (March 2026).
- Annexure – C: FIR in Crime No. 0250/2024.
- Annexure – D: FIR No. 69/2025.

Copy to:

SHRI. JAGADEESHA G, IAS,
Hon'ble Deputy Commissioner & District Magistrate,
Bengaluru Urban District,
Kempegowda Road,
Behind Kandaya Bhavana,
Bengaluru – 560 009, Karnataka.

Annexure - A

108 (90) (40)

ಕರ್ನಾಟಕ ಹೈಕೋರ್ಟ್, ಬೆಂಗಳೂರು
 HIGH COURT OF KARNATAKA



Search

Case Status > Case Status



Status: ●

Case Number: WP 7473/2026
 (24HC001164782026) Classification: GM RES Date of Filing: 02/03/2026
 10:28:41

Petitioner: MR. DARSHAN SRINIVAS
 Petitioner Advocate: PRATHAM N

Respondent: UNION OF INDIA
 Respondent Advocate: KUMAR M N

Ping No: WP 7463/2026
 Judge: REGISTRAR (RECRUITMENT)

Last Posted For: NON-COMPLIANCE OF OFFICE-ORDERS FOR 2ND TIME
 Last Date of Action: 11/03/2026 Last Action Taken:

Next Hearing Date:

Petitioner Details: WP 7473/2026

Respondent Details: WP 7473/2026

Sl.No	Petitioner	Address	Sl.No	Respondent	Address
1	MR. DARSHAN SRINIVAS	AGED ABOUT 47 YEARS, S/O. LATE THOOGUDEEPA SRINIVAS 217, THOOGU DEEPA NILAYA, F ROAD, IDEAL HOME TOWNSHIP, RAGARAJESHWARI NAGAR, BENGALURU, KARN KARNATAKA-560 098. Advocate: PRATHAM N 9183XXXX60 praXXXXXXXX@gmail.com	1	UNION OF INDIA	MINISTRY OF INFORMATION AND BROADCASTING, ROOM NO. 655, A- WING, SHASTRI BHAWAN, NEW DELHI-110 001 REPRESENTED BY ITS SECRETARY Advocate: KUMAR M N 9448XXXX17 kmnXXXXXXXXX@gmail.com
			2	THE SECRETARY,	MINISTRY OF ELECTRONICS AND INFORMATION TECHNOLOGY (MEITY), ELECTRONICS NIKETAN, 6 CGO COMPLEX, LODHI ROAD, NEW DELHI-110003 Advocate: KUMAR M N 9448XXXX17 kmnXXXXXXXXX@gmail.com

© 2023 [Faint text]

[Faint text]



[Faint text]

[Faint text]

[Faint text]

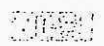
[Faint text]

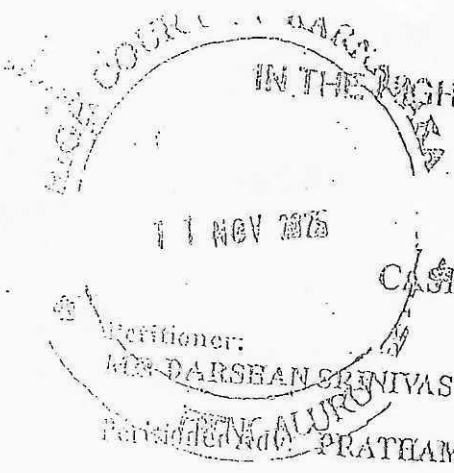
Content developed by [Faint text]

Designed by [Faint text]

Hosted by [Faint text]

HOA 5555 WPM | Today's Water Quality | Water Quality | [Faint text]





Pratham N
409 (41) 91

IN THE HIGH COURT OF KARNATAKA AT BENGALURU

ORDER SHEET PART - I

ERNO:-WP 24654 / 2024

CASE NO:-WP 24836 / 2024 (GM RES)

Respondent:
UNION OF INDIA

Respondent Adv:

Date of Filing :09/09/2024

Office Notes

Orders of Court

Receipt: 40660/2024 (Rs.100.00 - 09/09/2024)

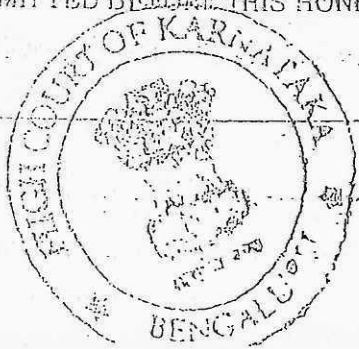
Challan No:

OFFICE NOTE:

THIS WP IS FILED PRAYING TO

REQUESTING THE R-1 TO PASS APPROPRIATE ORDER TO RESTRAIN MEDIA AGENCIES FROM PUBLISHING PRINTING AND DISSEMINATING CONFIDENTIAL INFORMATION CONTAINED IN THE CHARGE SHEET AND OTHER SUCH MATERIAL COLLECTED DURING THE COURSE OF INVESTIGATION IN RELATION TO THE CASE CHARGE SHEET IN FIR NO. 0250/2024 ANNA-A PENDING ADJUDICATION BEFORE XXIV ACMM COURT BENGALURU

2. ISSUE A WRIT OF MANDAMUS DIRECTING THE RESPONDENTS NO.2 ABIDE BY THE CIRCULAR DATED 11.08.2021 (ANNEXURE N) AND CONSEQUENTLY TO PASS APPROPRIATE ORDERS AGAINST THE RESPONDENT NO. 2 TO ENSURE THAT THE DIGITAL EVIDENCE/EVIDENCE/CONFESSIONS/PHOTOGRAPHS ETC PROCURED BY MEDIA HOUSES/NEWS CHANNELS THROUGH UNAUTHORIZED MEANS IS SUBMITTED BEFORE THIS HONBLE COURT.



This Certified copy contains 9 Pages
And Copying charges of ₹ 27
Received

10

10

10

10



The following table shows the results of the experiments conducted on the 10th of the month. The data indicates a significant increase in the rate of reaction when the concentration of the reactants is increased. This is consistent with the theoretical predictions based on the collision theory of chemical reactions.

Concentration (M)	Rate of Reaction (mol/L·s)
0.1	0.001
0.2	0.004
0.3	0.009
0.4	0.016
0.5	0.025

The results clearly demonstrate that the rate of reaction is directly proportional to the concentration of the reactants. This relationship is further supported by the fact that the rate increases by a factor of 5 when the concentration is increased from 0.1 M to 0.5 M.

#10

92

(42)

WP NO. 24836/2024

IN THE HIGH COURT OF KARNATAKA AT BENGALURU
[MR. DARSHAN SRINIVAS VS. UNION OF INDIA AND ANOTHER]

10.09.2024

(VIDEO CONFERENCING / PHYSICAL HEARING)

CORAM: HON'BLE MR JUSTICE HEMANT CHANDANGOUDAR

ORAL ORDER

Learned counsel for the petitioner files a memo seeking impleadment of news channels/media houses/electronic media and other social platforms as co-respondents who are allegedly airing, printing and publishing the contents of the charge sheet in relation to Crime No.0250/2024 registered by the Kamakshipalya Police Station.

The memo is placed on record. Petitioner is permitted to implead the proposed respondents as respondents 3 to 40 and file the amended cause title.

Sri Prabhulinga Navadgi, learned Senior Counsel representing the petitioner's counsel submits that the Bombay High Court in the case of Nitesh Navalakha & ors. -vs- Union of India - (2021) SCC OnLine Bom 56 has restrained the press/media from printing/displaying any news item and/or initiating any discussion/debate/interview of the nature, as indicated hereunder:

"a. In relation to death by suicide; depicting the deceased as one having a weak character or intruding in any manner on the privacy of the deceased;

b. That causes prejudice to an ongoing inquiry/investigation;



43

93

##

WP NO. 24836/2024

i) Referring to the character of the accused/victim and creating an atmosphere of prejudice for both;

ii) Holding interviews with the victim, the witnesses and/or any of their family members and displaying it on screen;

iii) Analyzing versions of witnesses, whose evidence could be vital at the stage of trial;

iv) Publishing a confession allegedly made to a police officer by an accused and trying to make the public believe that the same is a piece of evidence which is admissible before a Court and there is no reason for the Court not to act upon it, without letting the public know the nitty-gritty of the Evidence Act, 1872;

v) Printing photographs of an accused and thereby facilitating his identification;

vi) Criticizing the investigative agency based on half-baked information without proper research;

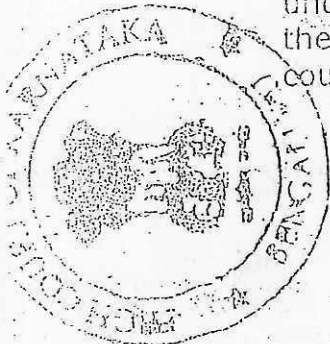
✓ vii) Pronouncing on the merits of the case, including pre-judging the guilt or innocence qua an accused or an individual not yet wanted in a case, as the case may be;

✓ viii) Recreating/reconstructing a crime scene and depicting how the accused committed the crime;

ix) Predicting the proposed/future course of action including steps that ought to be taken in a particular direction to complete the investigation; and

x) Leaking sensitive and confidential information from materials collected by the investigating agency;

c. Acting in any manner so as to violate the provisions of the programme Code as prescribed under section 5 of the CTVN Act read with rule 6 of the CTVN Rules and thereby inviting contempt of court; and

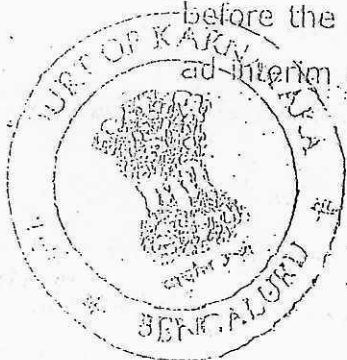


#9H

d. Indulging in character assassination of any individual and thereby mar his reputation."

However, the Electronic Media contrary to the guidelines are broadcasting on their respective channels prejudice to the case of the petitioner - accused in Crime No.0250/2024. He further submits that in an identical circumstances, the Delhi High Court in the case State of NCT Delhi -vs- Union of India and ors. - (WP (Crl.) 1090/2023 has directed the respondent No.1-Union of India to pass appropriate orders to media agencies from publishing, printing and disseminating confidential information contained in the charge sheet and the other such material collect during the course of information in relation to the case FIR No.659/2022 and shall ensure that guidelines such issued be complied with.

Learned Senior Counsel further submits that the wife of the petitioner had filed a suit in O.S.No.6082/2024 for permanent injunction against the media channels and the jurisdictional Civil Court by order dated 27.08.2024 restrained the defendants therein by way of ex-parte ad-interim temporary injunction order, from airing, printing, publishing any statement in relation to the investigation being undertaken by Kamakshipalya Police Station against Sri. Darshan Srinivas, who is arraigned as accused No.2 and from airing, printing, publishing any statement about the final reports, confessional statements and holding debate/discussion/interview on the final report pertaining to FIR No.0250/2024 pending adjudication before the XXIV ACMM Court, Bengaluru. Despite the ex-parte ad-interim order granted, the media channels continue to air,



45

95 #13

WP NO: 24836/2024

print, publish and disseminate the confidential information contained in the charge sheet in relation to the said crime.

The Hon'ble Supreme Court in the case of **Sidhartha Vashisht Alias Manu Sharma vs. State (NCT of Delhi) - (2010) 6 SCC 1**, has ruled that despite the significance of the print and electronic media in the present day, it is not only desirable but least that is expected of the persons at the helm of affairs in the field, to ensure that trial by media does not hamper fair investigation by the investigating agency and more importantly does not prejudice the right of defence of the accused in any manner whatsoever and it will amount to travesty of justice if either of this causes impediments in the accepted judicious and fair investigation and trial.

Clause (5) of the Cable Television Networks (Regulation) Act, 1995 states that no person shall transmit or re-transmit through a cable service any programme unless such programme is in conformity with the prescribed programme code.

Rule 6 of the Cable Television Networks Rules, 1994 narrates the program code and it states that, no programme should be carried in the cable service which:

- (a) xxxxxxxx
- (b) xxxxxxxx
- (c) xxxxxxxx



96

114

46

WP NO. 24836/2024

(d) Contains anything obscene, defamatory, deliberate, false and suggestive innuendos and half truths;

✓

(e) xxxxxx

(f) Contains anything amounting to contempt of court;

✓

(g) xxxxxxxx

(h) xxxxxxxx.

(i) Criticises, maligns or slanders any individual in person or certain groups, segments of social, public and moral life of the country ;

✓

(j) xxxxxxxx

(k) xxxxxxxx

(l) xxxxxxxx

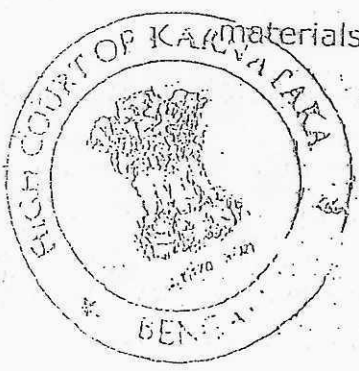
(m) xxxxxxxx

(n) xxxxxxxx

(o) xxxxxxxx

Following the order of the Division Bench of this Court in W.P.No.7026/2021, the Government of Karnataka has issued a Circular dated 11.08.2021, whereby the following directions have been issued to the police personnel of Karnataka who have been entrusted with the task of investigation of any crime:

a) No police personnel shall brief and disclose to the print, electronic and social media about the nature of the investigation under progress, the materials collected during the investigation, before



(17) 97 115
completion of the entire investigation and before acceptance of final report of the investigation by the competent jurisdictional courts.

b) No police personnel shall disclose and share the identity of the complainant and the accused in connection with the crime under investigation, to the print, electronic and social media until the completion of the investigation and before acceptance of final report of the investigation by the competent jurisdictional courts.

c) All police personnel in the State should strictly adhere to the guidelines issued through this Circular, in addition to the Circulars instructions that have been already issued by the DG&IGP has referred above.

d) Any lapses in this regard by any police personnel will be viewed seriously and it would attract immediate disciplinary action against such police personnel by the concerned disciplinary authority.

e) Any lapses in this regard will be considered as a serious misconduct on the part of concerned officer and in addition to disciplinary action against such officer, if warranted, criminal action may also be initiated against such officers.



98 #6

WP NO. 24836/2024

68

f) However, the information relating to registration of FIR can be disseminated as per the direction of Hon'ble Supreme Court of India in WP.(CRL) No.68/2016 and in the light of section 41C of the CrPC. Except for the compliance of section 41C and directions of Hon'ble Supreme Court of India in WP.(CRL) No.68/2016, the instructions / directions issued in the present Circular would be applicable in full force and strict sense."

Sri Aravind Kamath, learned Additional Solicitor General for the respondent No.1 submits that if complaint is filed, an appropriate action will be taken in accordance with law.

Petitioner has established a prima facie case to grant an ex-parte interim order.

Accordingly, I pass the following:

ORDER

(i) Respondents 3 to 40 are hereby restrained from publishing, printing, airing and disseminating confidential information contained in the charge sheet in relation to Crime No.: 0250/2024 registered by the Kamakshipalya Police Station, till the next date of hearing.

(ii) Respondent No.1 to communicate this order to respondents 3 to 40.



(9)

(9a)

119

WP NO. 24836/2024

Needless to state that respondent No.1 to take appropriate action against respondents 3 to 40, if they telecast, print, air or publish any statements in violation of the Cable Television Networks Rules, 1994.

Issue emergent notice to respondents 3 to 40.



Sd/-
Judge

TRUE COPY
Section-Officer
High Court of Karnataka
Bangaluru-560 001

- a) The date on which the application was made..... 7-11-25
- b) The date on which charges and addl. charges if any, are called for..... 12-11-25
- c) The date on which the charges and addl. charges if any, are deposited..... 13-11-25
- d) The date on which copy is ready..... 14-11-25
- e) The date of notifying that the copy is ready for delivery..... 14-11-25
- f) The date on which copy is delivered to the applicant..... 15-11-25

In The Court Of : CCH26 X ADDL. CITY CIVIL AND SESSIONS JUDGE

CNR Number : KABC010220032024

Case Number : O.S./0006082/2024

Date : 07-08-2024

MVA KALAKSHMI DARSHAN Versus INDIAN EXPRESS

Daily Status

Business	Next Purpose	Next Hearing Date
<p>INTERIM ORDER ON IA. NO.1 This I.A. No.1 is filed by the plaintiff under Order XXIX Rule 1 and 2 of Code of Civil Procedure, 1908 to restrain the defendants from airing, printing, publishing any statement in relation to the investigation being undertaken by Kamakshipalya police station against Sri. Darshan Srinivas who is arrayed as accused No.2 in FIR No.0250/2024 and from making any statement from airing, printing, publishing any statement about the final report inter alia FSL reports, confessional statements and holding debate/ discussion/ interview on the said issue pending adjudication of the matter before XXIV ACMM Court, Bangalore. 2. Heard learned Senior counsel appearing for the plaintiff on I.A. No:1. Perusal of the pleadings and the copies of the documents placed on record. 3. It is submitted by learned Senior counsel that on the guise of fair journalism, the defendant media houses are telecasting/ publishing news claiming to have received credible information from the officers of the investigating team. It is the apprehension of the plaintiff that the investigating team is submitting final report and the defendants who are active in the process of securing the confidential information and sensitive aspects of the final report, may telecast the same in a derogatory and defamatory way in order to increase their TRP and thereby are holding media trials and are violating the right of fair trial to the accused enshrined under Article 21 of the Constitution. It is further submitted that under the guise of fair journalism the defendants are exposing probable evidence and are discussing the FSL report with the public which could be examined only by the investigating agency or by the competent courts, during the course of trial and the manner in which they are airing the issue amounts to media trials and sought to restrain the defendants by way of ex parte ad-interim temporary injunction order. 4. Learned senior counsel appearing for the plaintiff has relied upon the judgment of the Division Bench of the Hon'ble High Court of Bombay in Nilesh Navalakha and others reported in 2021 SCC Online Bombay 56 wherein the Hon'ble High Court by considering the interest of the accused and the victim has held that no report/ discussion/ debate should be presented by the press/ media which could harm the interest of the accused being investigated or a witness and has also issued various guidelines to press media to refrain from printing/ displaying any news of the present nature: 5. Learned senior counsel has also brought to the notice of the Court about the circular issued by the Government of Karnataka in No.HD/59/SST/2021 dated 11-08-2021, where in instructions are given to prohibit disclosure of information regarding details of cases under investigation, based on the order passed by our Hon'ble High Court in W.P.No.7026/2021/PIL dated: 15-06-2021. It is the apprehension of the plaintiff that the investigation officer is submitting the charge sheet and the media/ press may secure the confidential information and sensitive aspects of the final report and telecast the same and it would prejudice the plaintiff. The copies of the news articles placed on record, shows the defendants are</p>	<p>SUMMONS</p>	<p>04-11-2024</p>

(5)

Business

~~119~~ (101)

Purpose

Date

releasing/ publishing news about the ongoing investigation, which is an utter disregard to the guidelines issued by Hon'ble High Courts. Hence in order to avoid the press/ media from holding media trials which would prejudice both the accused and the victim, it is considered just and necessary to meet out the apprehension pleaded by the plaintiff. Thus, this Court is of opinion that the plaintiff has made out a prima facie case and the balance of convenience lies in favour of the plaintiff and if the order of temporary injunction is not granted right of fair trial to the accused enshrined under Article 21 of the Constitution will be violated. Hence, this Court proceeds to pass following : ORDER The defendants are hereby restrained by way of this ex parte ad-interim TI order, from airing, printing, publishing any statement in relation to the investigation being under taken by Kamakshipalya Police against Sri. Darshan Srinivas who is arrayed as accused No.2 and from airing, printing, publishing any statement about the final report inter alia FSL reports, confessional statements and holding debate/ discussion/ interview on the final report pertaining to FIR No.0250/2024 pending adjudication before XXIV ACMM Court, Bengaluru. This order shall remain in force till next date of hearing. Issue temporary injunction order if the same is complied under Order 39 Rule 3(A) of C.P.C. Issue temporary injunction order, suit summons and notice on I.A. No.1 to defendants No.1 to 38. By: 04.11.2024

80

~~100~~ 102

52

O.S.No. 7875/2024

[Faint, illegible text, likely bleed-through from the reverse side of the page]

ORDER

The plaintiff has filed this suit seeking perpetual prohibitory injunction relief. He has

53

831

~~101~~

103

O.S.No. 7875/2024

also filed I.A.No.1 under Order XXXIX Rules 1 and 2 r/w/s 151 of the Code of Civil Procedure praying an ad-interim order of temporary injunction against the defendants No.1 to 7 restraining them from airing or printing; publishing unverified statement, any hearsay statement, any uncorroborated statement, any such statements that are factually incorrect or untrue against the plaintiff, his wife and son and his family members in any print media, newspaper, television channels, local cable operated channels, or internet / websites and electronic and personal social media handles, etc., of the defendant No.1 and other defendants.

Heard. Perused the plaint averments, I.A.No.I, affidavit and the documents produced on record. The documents i.e., the copies of the complaint, FIR and the screen shots of the statements of the defendant No.1 on electronic media and social media shows that, the plaintiff has prima facie case.

56

O.S.No. 7875/2024

At this stage, the plaintiff has made out prima facie case for grant of interim order of injunction. In the event if notice is issued to the defendants No.1 to 7, very purpose of the suit would be defeated. Hence, notice to the defendants No.1 to 7 on I.A.No.1 is dispensed and I proceed to pass the following:

ORDER

Issue ad-interim order of temporary injunction by temporarily restraining defendants No.1 to 7 from airing or printing; publishing unverified statement, unauthenticated information or opinion which lowers' the image of the plaintiff in any print media, newspaper, television channels, local cable operated channels, or internet / websites and electronic and social media till the next date of hearing.

✓

55

101

~~123~~

105

O.S.No. 7875/2024

The plaintiff shall comply Order XXXIX Rule 3(a) of the C.P.C.

Issue suit summons and exparte T.I. order to the defendants No.1 to 7 returnable by 11.12.2024.

In the event sufficient process fee, plaint and I.A. copies are not furnished within three working days from the date of this order, the interim order stands automatically vacated without any further orders.

(K.SRIVIDYA),
XLII A.C.C. & S.J., Bengaluru.

IN THE COURT OF THE X ADDL. CITY CIVIL &
SESSIONS JUDGE, BENGALURU (CCH-26)

Dated this the 19th day of June, 2024

Present

Sri. Vijaya Kumar Rai, B.Com., LL.B.,
X Addl. City Civil & Sessions Judge,
Bengaluru.

O.S. No.4267/2024

Plaintiff: Smt.Vijayalakshmi Darshan
w/o Sri Darshan Srinivas
aged about 43 years
r/at #217, Thoogu Deepa Nilaya
F Road, Ideal Home Township
Rajarajeshwari Nagar
Bengaluru-560 098

Vs.

Defendants: Indian Express
502, Devatha Plaza, 5th Floor
131, Residency Road
Bengaluru-560 025
Rep. By Editor in Chief
and 37 others

I.A. No.1

Applicant : Smt.Vijayalakshmi Darshan - Plaintiff

v/s

Opponents : Indian Express & others - Defendants

Provision under which the application is filed - U/O XXXIX R 1 & 2
CPC

Relief sought for - Interim exparte TI

The date on which the application is filed - 18.06.2024

Number of the application - I.A.No.1

The date on which the objections are filed by
different opponents

The date on which the orders were passed on
the said application - 19.06.2024

58

105

107

INTERIM ORDER ON I.A. No.1

I.A.No.1 is filed by the plaintiff to restrain the defendants from printing, publishing or telecasting defamatory statements against her, her husband and family members in relation to the investigation being undertaken by Kamakshipalya Police Station against her husband who is arrayed as accused No.2 in Crime No.250/2024, pending adjudication before the 24th Addl. Chief Metropolitan Magistrate, Bengaluru.

2. It is stated that husband of the plaintiff is arrayed as an accused along with others in connection of death of a person and therefore the husband of the plaintiff is in custody of the Police allegedly being responsible for the murder in connection with the case registered by Kamakshipalya Police, Bengaluru and though the investigation is underway the defendants Media is making charges against the plaintiff's husband and gone to the extent of calling him as a murderer though the investigation is at a preliminary stage. It is also stated that the defendants- electronic media are triggering debates which has defamed the plaintiff and her family. It is further stated that the defendants are fabricating the news and trying to show in the media that plaintiff and her husband are heading towards separation and the plaintiff's husband and plaintiff do not have a healthy relationship as husband and wife and therefore such uncorroborated statements have deeply

(100) #26 (108) 58

impacted the family bonding of the plaintiff's family. It is also stated that plaintiff's son was deeply hurt from such false and fabricated statements and plaintiff's son has even expressed his dismay and disbelief over the statements made in the social media. It is also stated that the defendants are also airing an alleged telephonic conversation between two police officers discussing about the acts said to be committed by the plaintiff's husband and it is nothing but pure media trial which cannot be done for the purpose of tarnishing the image and reputation of the plaintiff and her family. It is also stated that the applications and news has affected the right of free fair and investigation of the trial and therefore an order of ex parte temporary injunction is required to prevent the defendants from printing, telecasting and publishing the defamatory statements against the plaintiff and her family.

3. Heard the learned Senior Counsel Sri Prabhuling Navadagi appearing on behalf of the plaintiff.

4. The point for determination of the Court is-

"Whether the plaintiff has made out grounds to grant an ex parte temporary injunction order?"

5. The finding of this Court on the above point is in the affirmative for the following:-

59

~~127~~

109

REASONS:-

6. As per the materials available on record, the Kamakshipalya Police have registered a case against the husband of the plaintiff and others for the offence of murder and other connected offences. The husband of the plaintiff happens to be a film actor. The materials produced by the plaintiff at this stage prima-facie reflects that the publications and telecasts made so far by the defendants not only with regard to the details of the investigation conducted by the Police but also the family relationship of the plaintiff with her husband.

7. The specific contention of the plaintiff is that the defendants are fabricating false and defamatory statements that the plaintiff and her husband are heading towards marital separation and they do not share any healthy relationship as husband and wife. It is further contended that such uncorroborated and false statements have deeply impacted the family bonding of the plaintiff with her husband and also their son. There is prima-facie materials to that effect.

8. Needless to mention that family relationship of the plaintiff and her husband are personal matters of the plaintiff and her husband and therefore the defendants cannot debate on that and make defamatory statements. In the decision of our Hon'ble High Court rendered in case of A.K. Subbaiah v/s. N. Garudachar

~~128~~

110

60

ILR 1987 Page 100 Karnataka, our Hon'ble High Court has held that the reputation is most valuable to any person and it is much more valuable than any amount of money or anything else in the world. The Hon'ble High Court has further held that merely because the law recognizes the truth or justification as a defence, it does not give the media the right to speak anything that likes. In the judgment of the Hon'ble Supreme Court rendered in the case of Omprakash Chautala v/s Kanwar Bhan and others (2014)5 SCC 417 the Hon'ble Supreme Court has held that when reputation is hurt, a man is half-dead. Therefore the defendants are required to consider the right of reputation of the plaintiff and her family while telecasting or publishing the news in connection to the offences in which her husband said to be involved.

9. Learned Senior Counsel has also brought to the notice of the Court the Circular issued by the Govt. of Karnataka in No.HD-59/SST/2021 dated 11.08.2021 pursuant to the direction of Hon'ble High Court passed in a Public Interest Litigation in WP No.7026/2021/PIL wherein the Hon'ble High Court has made it clear that before completion of the investigation the Police Officers shall not divulge the nature of the investigation and prohibited from disclosing the identity of the complainant and accused. The Govt has specifically directed that no police officers shall brief and disclose to the print and electronic or social media about the nature

(61)

~~124~~

(111)

of the investigation under progress and also the materials collected during the investigation except disseminating the information relating to the registration of the FIR. It is contended that inspite of this, the defendants are illegally publishing incorrect information which is nothing but media trial affecting free and fair investigation. At this stage, there is sufficient force on the submission made by the learned Senior Counsel. No doubt the criminals can be exposed and offences cannot be viewed lightly, but in the guise of exposing the offences, the personal life, liberty and reputation of a person cannot be marred. It shall be noted that the investigation has not been completed and therefore it is too premature to the defendants to express any opinion about the guilt or otherwise of the husband of the plaintiff. It is well settled law that the doubts how so ever high it will not substitute the proof. Hence it is too premature to the defendants to express any opinion about the guilt or otherwise of her husband in the alleged crime. It is highly improper to publish or telecast the information and news as if he has committed the guilt. Having regard to these aspects, an order of ex parte temporary injunction is very much necessary. If notice is issued it takes time and in the interregnum period there will be further publications and telecasting of the news which would damage the reputation of the plaintiff and her husband. Therefore if notice is issued, the very object of granting an order of ex parte

~~120~~ (112)

(52)

temporary injunction would be defeated by delay. Hence, the above point is answered in the affirmative and the following order is passed:-

ORDER

The defendants, their reporters, anchors or any other persons claiming on behalf of them are restrained from printing, publishing, telecasting the news or any other information touching the personal and family life of the plaintiff, her husband Darshan Srinivas or publishing or telecasting any unauthenticated information/opinion in connection with the investigation in Crime No.250/2024 conducted by Kamakshipalya Police Station.

(Dictated to the Senior Sheristedar through Dictaphone recorded by me, transcribed by him on Computer, carried out corrections, taken print out and then then pronounced in the Open Court on this the 19th day of June, 2024).

(Vijaya Kumar Rai)
X Addl. City Civil & Sessions Judge
Bengaluru.



(11)

Faint, illegible text at the top of the page, possibly a header or title.

INDEX

The following is a list of the contents of this book, arranged in alphabetical order of the author's name.

1. *Introduction* by [illegible]

2. *Chapter I* by [illegible]

3. *Chapter II* by [illegible]

4. *Chapter III* by [illegible]

5. *Chapter IV* by [illegible]

6. *Chapter V* by [illegible]

7. *Chapter VI* by [illegible]

8. *Chapter VII* by [illegible]

9. *Chapter VIII* by [illegible]

10. *Chapter IX* by [illegible]

11. *Chapter X* by [illegible]

12. *Chapter XI* by [illegible]

13. *Chapter XII* by [illegible]

14. *Chapter XIII* by [illegible]

15. *Chapter XIV* by [illegible]

16. *Chapter XV* by [illegible]

17. *Chapter XVI* by [illegible]

18. *Chapter XVII* by [illegible]

19. *Chapter XVIII* by [illegible]

20. *Chapter XIX* by [illegible]

21. *Chapter XX* by [illegible]

22. *Chapter XXI* by [illegible]

23. *Chapter XXII* by [illegible]

24. *Chapter XXIII* by [illegible]

25. *Chapter XXIV* by [illegible]

26. *Chapter XXV* by [illegible]

27. *Chapter XXVI* by [illegible]

28. *Chapter XXVII* by [illegible]

29. *Chapter XXVIII* by [illegible]

30. *Chapter XXIX* by [illegible]

31. *Chapter XXX* by [illegible]

The following is a list of the authors of the chapters in this book, arranged in alphabetical order of their names.

1. [illegible]

2. [illegible]

3. [illegible]

4. [illegible]

5. [illegible]

6. [illegible]

7. [illegible]

8. [illegible]

9. [illegible]

10. [illegible]

11. [illegible]

12. [illegible]

13. [illegible]

14. [illegible]

15. [illegible]

16. [illegible]

17. [illegible]

18. [illegible]

19. [illegible]

20. [illegible]

21. [illegible]

22. [illegible]

23. [illegible]

24. [illegible]

25. [illegible]

26. [illegible]

27. [illegible]

28. [illegible]

29. [illegible]

30. [illegible]

31. [illegible]

32. [illegible]

33. [illegible]

34. [illegible]

35. [illegible]

36. [illegible]

37. [illegible]

38. [illegible]

39. [illegible]

40. [illegible]

41. [illegible]

42. [illegible]

43. [illegible]

44. [illegible]

45. [illegible]

46. [illegible]

47. [illegible]

48. [illegible]

49. [illegible]

50. [illegible]

The following is a list of the publishers of the chapters in this book, arranged in alphabetical order of their names.

1. [illegible]

2. [illegible]

3. [illegible]

4. [illegible]

5. [illegible]

6. [illegible]

7. [illegible]

8. [illegible]

9. [illegible]

10. [illegible]

11. [illegible]

12. [illegible]

13. [illegible]

14. [illegible]

15. [illegible]

16. [illegible]

17. [illegible]

18. [illegible]

19. [illegible]

20. [illegible]

21. [illegible]

22. [illegible]

23. [illegible]

24. [illegible]

25. [illegible]

26. [illegible]

27. [illegible]

28. [illegible]

29. [illegible]

30. [illegible]

31. [illegible]

32. [illegible]

33. [illegible]

34. [illegible]

35. [illegible]

36. [illegible]

37. [illegible]

38. [illegible]

39. [illegible]

40. [illegible]

41. [illegible]

42. [illegible]

43. [illegible]

44. [illegible]

45. [illegible]

46. [illegible]

47. [illegible]

48. [illegible]

49. [illegible]

50. [illegible]

The following is a list of the titles of the chapters in this book, arranged in alphabetical order of their titles.

1. [illegible]

2. [illegible]

3. [illegible]

4. [illegible]

5. [illegible]

6. [illegible]

7. [illegible]

8. [illegible]

9. [illegible]

10. [illegible]

11. [illegible]

12. [illegible]

13. [illegible]

14. [illegible]

15. [illegible]

16. [illegible]

17. [illegible]

18. [illegible]

19. [illegible]

20. [illegible]

21. [illegible]

22. [illegible]

23. [illegible]

24. [illegible]

25. [illegible]

26. [illegible]

27. [illegible]

28. [illegible]

29. [illegible]

30. [illegible]

31. [illegible]

32. [illegible]

33. [illegible]

34. [illegible]

35. [illegible]

36. [illegible]

37. [illegible]

38. [illegible]

39. [illegible]

40. [illegible]

41. [illegible]

42. [illegible]

43. [illegible]

44. [illegible]

45. [illegible]

46. [illegible]

47. [illegible]

48. [illegible]

49. [illegible]

50. [illegible]

113

Annexure - B



BOSS KANNADA MOVIE TEASER:

https://youtu.be/jW0tVg9L_pM?si=JdsF0u7tinVDG2oE

BOSS MEET BY DIRECTOR:

https://youtu.be/Y4m6_tF7tSo?si=zZ2e7EkT9_0GXtZH

INSTAGRAM VIDEO:

https://www.instagram.com/reel/DVqkpN8lcBh/?igsh=MW41c3pz7_3RpZ3Bwce%3D%3D

YOUTUBE SHORTS:

https://youtube.com/shorts/Tnq4AgPO6_U?si=nntrqUKOIK27ppqJ

FACEBOOK VIDEO:

<https://www.facebook.com/reel/753486114386151>

SOUTHWOOD TALKIES:

https://www.instagram.com/reel/DVqx8GjiZOd/?igsh=bWircXo2cm8_3VWfw&wa_logging_event=video_play_open

TV9 KANNADA OFFICIAL:

https://www.instagram.com/reel/DVqeE52E5eW/?igsh=MTM4ZmVp_7a192aD133ZO%3D%3D

OTHER LINKS:

https://www.instagram.com/reel/DQf75jeASKg/?igsh=ZjlkOG0wez14_13W5s&wa_logging_event=video_play_open

(21)

120
11H

Annexure - C

(64)

KARNATAKA STATE POLICE

FIRST INFORMATION REPORT
(Under Section 154 Cr.PC)

Before the Honourable Court of 24th Addl. CMM Court, Nrupalunga Road,
Bangalore City

1. District : Bengaluru City Circle/Sub Division : Vijayanagar Sub-Divis PS : Kamakshipalya PS
Crime No : 0250/2024 FIR Date : 09/06/2024

2. Act & Section : IPC 1860 (U/s-302,201)

3. (a) Occurrence of Offence Day : Sunday From Date : 09/06/2024 To Date : 09/06/2024
From Time : 08:00:00 To Time : 08:30:00
(b) Information received at the PS : 09/06/2024 09:10:00
Written/Oral : Written

(c) Reasons for Delay in reporting by the Complainant / Informant

(d) General Diary reference Entry No. & Time : 1 , 09:10:00

4. (a) Place of occurrence with full address
Beside Rajakaluve, Near Satva Anugraha Apartment, Summanahalli, Bengaluru
City, Karnalaka, 560079

(b) Distance from PS : Towards West 2 KMs from PS

(c) Village : SALARPURI Beat Name : 3rd BEAT
A SATTVA
APPARTME
NT
JUNCTION

(d) If the place belongs to another jurisdiction, PS. Name :

District :

5. Complainant/Informant:

(a) Name : Keväl Ram Dorji Father's/Husband's Name : Jayabahaddur Dorji

(15)

(11)

133

(15)

(b) Age : 27
(c) Religion :
(d) Fax :
(e) Occupation : Employed in private firms
(f) Caste :
(g) Email :
(h) Phone No. : 9148064220
(i) Nationality : India
(j) Passport No. :
Date of Issue :
(k) Address : Security Officer In
Satva Anugraha
Apartment,
Sumnanhalli
Bengaluru, Reside
nt at House No.
nill, Near Indian
Petrol Bunk, Ullal,
Bengaluru City ..
Karnataka
(l) Sex: Male

(m) Whether complainant has seen the occurrence or merely heard of it:

6. Details of known/suspected/unknown accused with full particulars(Attach separate sheet if necessary)

Sl.No.	Name / Father Name / Caste / Address	Type	Person Type	Sex	Age	Occupation
		Unknown				

7. Details of Victims with full particulars

Sl.No.	Name	Address	Injury Type	Sex	Age	Occupation
1	Unknown	Bengaluru City Karnataka	Fatal	Male	35 years	

8. Particulars of Property stolen/involved with value(Attach separate sheet if necessary)

Sl.No.	Property Type	Item description	Estimated Value (In Rs.)
1			

Total Value of the property Stolen / Involved :

9. Inquest Report/U.D. Case No. if any :

#34

116

66

10. F.I.R Contents (Attach separate sheet if necessary)

ಈ ದಿನ ದಿನಾಂಕ: 09/06/2024 ರಂದು ಪಿಯಾರ್‌ದವರಾದ ಶ್ರೀ ಕೇವಲ್ ರಾಮ್ ಬೋರ್ ಜಿ ರವರು ನೀಡಿದ ದೂರಿನ ಸಾರಾಂಶವೇನೆಂದರೆ,
ನಾನು ಸುಬ್ರಹ್ಮಣ್ಯದಲ್ಲಿಯೂ ಸಶ್ವ ಅನುಗ್ರಹ ಅಪಾರ್ಟ್‌ಮೆಂಟ್ ನಲ್ಲಿ ಸೆಕ್ಯೂರಿಟಿ ಅಭಿಷರ್ ಆಗಿ ಕೆಲಸ ಮಾಡಿಕೊಂಡಿದ್ದು, ದಿನಾಂಕ: 09/06/2024
ರಂದು ರಾತ್ರಿ, 08-00 ಗಂಟೆಗೆ ನಾನು ಅಪಾರ್ಟ್ ಮೆಂಟ್ ನಲ್ಲಿ ಕರ್ತವ್ಯಕ್ಕೆ ಪರದಿ ಮಾಡಿಕೊಂಡಿದ್ದು, ನಾನು ಅಪಾರ್ಟ್‌ಮೆಂಟ್ ಪುಂಭಾಗದ
ಮೇಲೆ ನಾನು ಕಾರ್ ರಸ್ತೆಯಲ್ಲಿ ಗಪ್ಪು ಮಾಡಿಕೊಂಡು ಬರುವಾಗ, ಪೇಟೆ ಜೆನ್ಸುಪ್ಪು ರಸ್ತೆಯ ಕ್ರಾಸ್ ಗೆ ಹೋಗುವ ಸ್ವಲ್ಪ ಪಕ್ಕದಲ್ಲಿ ನುಮಾರು
10-15 ಗಂಟೆಗೆ ಅಪರಿಚಿತ ವ್ಯಕ್ತಿಯ ಮೃತದೇಹ ರಸ್ತೆಯ ಪಕ್ಕದಲ್ಲಿ ಬಿದ್ದಿರುವುದು ಕಂಡುಬಂದಿರುತ್ತದೆ. ನಂತರ ನಾನು ಏಪಾಯವನ್ನು
ನುಮಾಣಿಸಿ ಪೊಲೀಸ್ ಠಾಣೆಗೆ ತಿಳಿಸಿರುತ್ತೇನೆ. ನಂತರ ಸ್ಥಳಕ್ಕೆ ಪೊಲೀಸರು ಬಂದಿದ್ದು, ಪರಿಶೀಲನೆ ನಡೆಸಿರುತ್ತಾರೆ. ಮೃತ ದೇಹದ ಮೇಲೆ ಹಲ್ಲೆ
ಬಾಧಿಸಿದ ಗಾಯದ ಗುರುತುಗಳು ಕಂಡುಬಂದಿದ್ದು, ಮುಖ ಹಾಗೂ ತಲೆಗೆ ಮತ್ತೆ ಕಿವಿಗೆ ರಕ್ತಗಾಯವಾಗಿರುವುದು ಕಂಡುಬಂದಿರುತ್ತದೆ. ಆದ್ದರಿಂದ
ಪೊಲೀಸ್ ಠಾಣೆಯಲ್ಲಿ ಕೊಲೆ ಪಾಂಡಿ ಇಲ್ಲಿಗೆ ತಂದು ಬಿಸಾಕಿರುವುದೆಂದು ಅನುಮಾನವಿದ್ದು, ಮೃತದೇಹವನ್ನು ಮರಣೋತ್ತರ ಪರೀಕ್ಷೆಗೆ ಒಳಪಡಿಸಿ
ಪೂರ್ವ ಪರೀಕ್ಷಾ ಅಧಿಕಾರಿಗಳನ್ನು ಪತ್ತೆ ಮಾಡಿ ಸೂಕ್ತ ಕಾನೂನು ಕ್ರಮ ಜರುಗಿಸಬೇಕೆಂದು ಕೋಟ್ಯ ದೂರು ಇತ್ಯಾದಿ.

11 (a) Action Taken : Investigation

(b) Is the F.I.R read over and explained in his/her language to the complainant and a copy given to the complainant free of cost? : Yes

If the Police Officer does not proceed to the spot for investigation or if he declines to investigate,

Under 157 Cr.PC provision (a) or (b) / 176 Bharatiya Nagarik Suraksha Sanhita (BNSS) the reasons there of should be mentioned :

Proceed

12. Signature/Thumb impression of the complainant

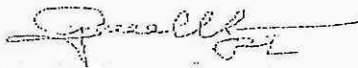
13. Date and time of dispatch to the Court : 09/06/2024 09:50:00

14. Name of PC/IC who carried the FIR to the Court : RATHISH R , HC 9816

Read Over and Found to be correct

Date and Time : 09/06/2024 09:20:00

Signature of the SHO



(67)

(111)

125

(117)

Name: GIRISH NAIK C - P1

Copy to: Superintendent of Police/Commissioner of Police

#26 (118)

(68)

ಚಾರ್ಜ್ ಶೀಟ್

ಪ್ರಥಮ ವರ್ತಮಾನ ವರದಿ

(ಭಾರತೀಯ ನಾಗರಿಕ ಸುರಕ್ಷಾ ಸಂಹಿತೆ 173 ರ ಅಡಿಯಲ್ಲಿ)

ಘಟನಾ ಸ್ಥಳ : 45th ACJM Court, Bengaluru City

1. ಸ್ಥಳ : Bengaluru City

ಅಪರಾಧ ಸಂಖ್ಯೆ : 0008/2025

ಪ್ರತಿ/ಲಿಪಿ ವಿಭಾಗ : Bengaluru City

ಪ್ರ.ವ.ದಿನಾಂಕ : 24/12/2025

ಪೊಲೀಸ್ ಠಾಣೆ : Cyber Crimo Police Station

2. ಕಾನೂನು ಮತ್ತು ನಿಯಂತ್ರಣ : INFORMATION TECHNOLOGY ACT 2000 (U/s-67,68(C)); THE BHARATIYA NYAYA SANKHITA (NIS), 2023 (U/s-351(3),352,75(3),351(2),79,17w 3(5))

3. (a) ಶುಕ್ರವಾರದ ದಿನ : Sunday

ದಿನಾಂಕ ದಿನ : 21/12/2025

ದಿನಾಂಕ ವರದಿ : 24/12/2025

ವೇಳೆಯಂಥ : 10:10:00

ವೇಳೆಯವರ : 10:30:00

(b) ಘಟನಾ ಸ್ಥಳ ಮತ್ತು ವರ್ತಮಾನ ಸ್ಥಳದ ದಿನಾಂಕ : 24/12/2025 15:00:00

ಬರವಣಿಗೆಯ ವಿಧಾನ / ಪದ : Written

(c) ಅಧಿಕಾರಿ/ವಿಚಾರಣಾ ಅಧಿಕಾರಿ/ವಿಚಾರಣಾ ಅಧಿಕಾರಿ :

(d) ಐ.ಪಿ.ಎಲ್ ನಿಯಂತ್ರಣ ಸಂಖ್ಯೆ ಮತ್ತು ಸಮಯ : 1, 15:00:00

(e) ಶುಕ್ರವಾರದ ಸ್ಥಳ :

Online, Bengaluru City, Karnataka.

(f) ಪೊಲೀಸ್ ಠಾಣೆ ಯಿಂದ ಇರುವ ದೂರ ಮತ್ತು ದೂರ : 13 KM

(g) ಸ್ಥಳ : Bengaluru city

ನಿಯಂತ್ರಣ : General

(h) ಸ್ಥಳೀಯ ಪೊಲೀಸ್ ಠಾಣೆ ವ್ಯಾಪ್ತಿಗೆ ಬರುವಂತಹದ್ದು ಆದರೆ ಆ ಪೊಲೀಸ್ ಠಾಣೆಯ ಹೆಸರು :

ಹೆಸರು :

4. ಅಧಿಕಾರಿ/ವಿಚಾರಣಾ ಅಧಿಕಾರಿ :

(a) ಹೆಸರು : Vijayalakshmi

ಶಿಬಿರ / ಗೌಡನ ಹೆಸರು :

(b) ವಯಸ್ಸು : 40

(c) ವೃತ್ತಿ :

(d) ಧರ್ಮ :

(e) ಉಚಿತ :

(f) ಉಚಿತ :

(g) ಇ-ಮೇಲ್ :

chbdch@gmail.com

(h) ದೂರವಾಣಿ : 9448383661

(i) ರಾಷ್ಟ್ರೀಯತೆ :

India

(j) ಬಾನ್ಸ್ ಪೋರ್ಟ್ ಸಂಖ್ಯೆ :

ನೀಡಿದ ದಿನಾಂಕ :

(3)

311

187

119

(ii) ವಿಳಾಸ : No.145 Tower 4
 Prestige south
 Ridge apartment
 100 feet ring road
 Hosakerihalli,
 Bengaluru City,
 Karnataka-560085

(i) ಲಿಂಗ : Female

(iii) ಒಯ್ಯಾರ್ಥದಿಂದ ಬಿಡುಗಡೆಗೆ ಸೋಡಿಯಂ ಅಥವಾ ಕೇಲೋಸಿಯಂ

6. ಗುರುತಿಸಿದ / ಅನುಮಾನಿತ/ಅಪರಿಚಿತ ವ್ಯಕ್ತಿಯ ಪೂರ್ವ ವಿವರಗಳು

SL.No.	ಹೆಸರು / ತಂದೆಯ ಹೆಸರು / ಜಾತಿ / ವಲಸೆ	ವರ್ಗ	ವ್ಯಕ್ತಿಯ ವರ್ಗ	ಲಿಂಗ	ವಸತಿ	ಜಿಲ್ಲೆ
1	Unknown 18 Socila media account holders and others(A1) NA/Bengaluru City, Karnataka	Accused	Common man	Male		

7. ಸಂಭವಿಸಿದ ವಿವರಗಳು

SL No.	ಹೆಸರು	ವಿಳಾಸ	ಗುರುತಿಸಿದ ವರ್ಗ	ಲಿಂಗ	ವಸತಿ	ಜಿಲ್ಲೆ
1	Vijayalakshmi	No.145 Tower 4 Prestige south Ridge apartment 100 , hosakerihalli Bengaluru City Karnataka		Female		

8. ಒಡೆತನಗಿರುವ / ಬಾಡಿಯಾಗಿರುವ ಸ್ವತ್ತುಗಳ ವಿವರಗಳು

SL.No	Property Type	Item description	Estimated Value (in Rs.)
1			

9. ಒಡೆತನಗಿರುವ / ಬಾಡಿಯಾಗಿರುವ ಸ್ವತ್ತುಗಳ ವಿವರಗಳು ;

(i) ಪೇಚಿನಾಡು ವರದಿ / ಯು.ಡಿ. ಕೇಸ್, ಸಂಖ್ಯೆ :

(ii) ಪ್ರಥಮ ವರ್ತಮಾನ ವರದಿಯ ವಿವರಗಳು

120

~~138~~

~~147~~

70

Op trolling (Instagram):

LINK :<https://www.instagram.com/reel/DSjlvQxkBcV/?igsh=MWQ1eDM1dJQyMTIvdg==>

9) <<<<Akshay @KingKiccha

LINK :<https://x.com/i/status/2002979820590989451>

10) Gooli@K_Cull @K_Cull_

LINK :<https://x.com/i/status/2002792836866170937>

11) Jeeva Kiccha @KicchakIngma...

LINK :<https://x.com/i/status/2002952073424593228>

12) @troll_nim_appa_)

LINK:https://www.instagram.com/troll_nim_appa?igsh=cHlxZGxoazZicW53

13) Jannak(@karonadu_kiccha)

LINK :https://www.instagram.com/karonadu_kiccha?igsh=cDdmMnN1Y2hoY3FQ

14) divyaa sharmaa(Instagram)

15) Kiccha_15_roller (Instagram)

16) n_12(Instagram)

17) mark_hoss45(Instagram)

18) Rohithda 0722 Rohith (Instagram) ಹಾಗೂ ಇತರರು.

ಇವರ ವಿರುದ್ಧವಾಗಿ ಆರೋಪ ಕಾರ್ಡ್ ಗಳ ಸೀನ್ ಲಾಪ್ ಪ್ರತಿಗಳನ್ನು ಮತ್ತು ಕಲಂ 63 ಭಾ.ಸ.ಆ ರೀತಿ ಸರ್ಕಿಲರ್ ಲಗತ್ತಿಸಿ ನೀಡಿರುವುದು.

11. (ಇ) ತನಿಖೆಯ ವಿಷಯ:

Investigation

(ಅ) ತನಿಖೆ ವರದಿಯನ್ನು ಡಿಫಾರ್ಮಿಯವರಿಗೆ ಅವರದ ಭಾಷೆಯಲ್ಲಿ ವಿವರಿಸಿ, ಓದಿ ಪೇಳಲಾಗಿದೆ

ಒಂದು ಪ್ರತಿಯನ್ನು ಪ್ರಕಟಣೆಯಾಗಿ ಕೊಡಲಾಗಿದೆಯೇ? : Yes

(ಆ) ಸೂಚನೆ ಅಧಿಕಾರಿಯು ತನಿಖೆಗೆ ಸ್ಥಳಕ್ಕೆ ಭಾವಿಸಿದಲ್ಲಿ, ಅಥವಾ ತನಿಖೆ ಮಾಡಲು ನಿರಾಕರಿಸಿದಲ್ಲಿ, ಕಲಂ

157 ಸಿ.ಆರ್.ಪಿ.ಸಿ ಯ ಕಲಂ (ಎ)ಅಥವಾ (ಬಿ)/178 ಭಾರತೀಯ ನಾಗರಿಕ ಸುರಕ್ಷಣಾ ಸಂಹಿತೆ (ಬಿಎನ್ಎಸ್ಎಸ್) ಅಡಿಯಲ್ಲಿ ಕಾರ್ಯವನ್ನು ಕಾರ್ಯನಿರ್ವಹಿಸಿತು.

12. ಡಿಫಾರ್ಮಿಯ ಸಹಿ/ ಪಟ್ಟಿರಿಸಿದ ಗುರುತು

Y. S. ...

13. ದಾಖಲೆಯನ್ನು ಕರೆಯಿಸಿದ ದಿನಾಂಕ ಮತ್ತು, ಸಮಯ : 24/12/2025 15:30:00

71

129 121

ಸಾರಾಂಶವೇನೆಂದರೆ ಒಯರ್ವುದಾರರ ಪತಿ ಬಲಸಚಿವರು ಸಚಿವರುಗಳಿಗೆ ಇದೇ ತಿಂಗಳು ಅಂದರೆ, ಡಿಸೆಂಬರ್ 11ನೇ ತಾರೀಖಿನಿಂದ
 12/2025) ಒಯರ್ವುದಾರರ ಪತಿ ಬಲಸಚಿವರು "ಡಿ ಡಿಎಲ್" ಎಂಬ ಕನ್ನಡ ಬಲಸಚಿವರು ರಾಜ್ಯಾದ್ಯಂತ ಬದುಗಬಿಡಲಾಗಿದ್ದು, ಅದರ ಕಾರಣವಾಗಿ
 ಒಯರ್ವುದಾರರ, 21/12/2025 ತಾರೀಖಿನಿಂದ ಡಿ ಡಿಎಲ್ ಬಹು ತಂದೆದೊಂದಿಗೆ ಹಾಜರಾಗಿಯಿರುತ್ತಾ, ಒಯರ್ವುದಾರರನ್ನು ಎದುರಿಸಿ
 ಕೊಡುವುದರಲ್ಲಿ ಭಾಗಿಯಾಗಿದ್ದು, ಬಹುದ ಬಗ್ಗೆ ನೋಡುವುದರಲ್ಲಿ ಮಾತನಾಡಿರುತ್ತಾರೆ, ಇದರ ಜೊತೆ ಚಿತ್ರವನ್ನು ನಟಿಸುವ ಪದವಿ ಕಟ್ಟುವುದರಲ್ಲಿ
 ಕೊಡುವುದರಲ್ಲಿ ಮಾತನಾಡಿರುತ್ತಾರೆ, ಇದೇ ಸಮಯದಲ್ಲಿ ಒಯರ್ವುದಾರರ ಚಿತ್ರವನ್ನು ಹಾಗೂ ಪತಿಯ ಬಗ್ಗೆ ಮಾತನಾಡಿರುತ್ತಾ, ಒಯರ್ವುದಾರರ
 ಕೊಡುವುದರಲ್ಲಿ ಮಾತನಾಡಿರುತ್ತಾರೆ, ಇದೇ ಸಮಯದಲ್ಲಿ ಯಾರು ಬಹು ಮಾತನಾಡಿರುತ್ತಾರೆ ಅದರ ಬಗ್ಗೆ ಅಭಿಪ್ರಾಯಗಳು ಕೊಡುವುದರಲ್ಲಿ
 ಮಾತನಾಡಿರುತ್ತಾರೆ, ಇದನ್ನು ಮಾಧ್ಯಮದಲ್ಲಿ ಪ್ರಚಾರ ಮಾಡಿರುತ್ತಾರೆ ಹಾಗೂ ಕಾರ್ಯದರ್ಶಿ ಜಿಬಿ ಕಾರ್ಯದರ್ಶಿ
 ಒಯರ್ವುದಾರರ ಹೇಳಿಕೆಯ ಬಗ್ಗೆ ಕೆಲವು ಕಡಿಗೇಡಿಗಳು ಬೇರೆ ರೀತಿಯಲ್ಲಿ ಅರ್ಥ ಮಾಡಿಕೊಂಡು ಒಯರ್ವುದಾರರ ಬಗ್ಗೆ ಅಶ್ಲೀಲವಾಗಿ ಕೆಲವು ಅಭಿಪ್ರಾಯ
 ವ್ಯಕ್ತಿಗಳು ಸಹಿ ಮಾಡಿಯಲ್ಲಿ ಅಂದರೆ (ಫೇಸ್ಬುಕ್, ಇನ್ಸ್ಟಾಗ್ರಾಂ, ವಾಟ್ಸಾಪ್ ಹಾಗೂ ಇತರ ಮಾಧ್ಯಮ ಪಾಲಿವಾರ್ಡ್ಗಳಲ್ಲಿ) ಕೆಲವು ಮಾತನಾಡಿರುತ್ತಾ
 ಹಾಗೂ ಕೆಲವು ಮಾತನಾಡಿರುತ್ತಾ, ಒಯರ್ವುದಾರರ ಕೊಡುವುದರಲ್ಲಿ ಮಾತನಾಡಿರುತ್ತಾರೆ, ಅಶ್ಲೀಲವಾಗಿ ಕೆಲವು ಮಾತನಾಡಿರುತ್ತಾರೆ, ಒಯರ್ವುದಾರರ
 ಕೊಡುವುದರಲ್ಲಿ ಮಾತನಾಡಿರುತ್ತಾರೆ, ಅಶ್ಲೀಲವಾಗಿ ಕೆಲವು ಮಾತನಾಡಿರುತ್ತಾರೆ, ಅಶ್ಲೀಲವಾಗಿ ಕೆಲವು ಮಾತನಾಡಿರುತ್ತಾರೆ, ಅಶ್ಲೀಲವಾಗಿ ಕೆಲವು ಮಾತನಾಡಿರುತ್ತಾರೆ
 ಇದರ ಬಗ್ಗೆ ಕೆಲವು ಮಾತನಾಡಿರುತ್ತಾರೆ, ಅಶ್ಲೀಲವಾಗಿ ಕೆಲವು ಮಾತನಾಡಿರುತ್ತಾರೆ, ಅಶ್ಲೀಲವಾಗಿ ಕೆಲವು ಮಾತನಾಡಿರುತ್ತಾರೆ, ಅಶ್ಲೀಲವಾಗಿ ಕೆಲವು ಮಾತನಾಡಿರುತ್ತಾರೆ
 ಒಯರ್ವುದಾರರ ಬಗ್ಗೆ ಅವಹೇಳನಕಾರಿ ಹೇಳಿಕೆ ಮತ್ತು ಅಶ್ಲೀಲ ಉಪನ್ಯಾಸ ಮಾಡಿದ ಪೋಸ್ಟ್ಗಳನ್ನು ಪ್ರತಿ ಬಹುದರೂವೆ ಲೋಕ ಬಂದಿಗಾಗಿ ಕೆಲವು
 1) YOGI KICCHA @yogiTweebx
 Link 1 : <https://x.com/i/status/200304991998966193>
 Link 2 : <https://x.com/i/status/2002791984885620770>
 2) Mahi Kiccha @ Mahi_Kiccha21
 Link: https://www.instagram.com/mahi_kiccha12?igsh=MTd2cGpkA3JIN3duaA==
 3) ViralKiccha18 @ViralKiccha1817
 Link: <https://x.com/i/status/2002768251546468448>
 4) Gus@ Sunnexyz
 Link: <https://x.com/i/status/2002754173876709726>
 5) MassGod!! @MassGodBoss
 LINK 1: <https://x.com/i/status/2003082841345966210>
 LINK 2: <https://x.com/i/status/2002775422053044284>
 LINK 3 : <https://x.com/i/status/2002775422053044284>
 6) Athreya Mx
 Link: <https://www.facebook.com/share/p/17ic3LIsUw/>

#10

122

72

ವಾಹನದ ಮಾದರಿ/ಶರೀರೀಕರಣದ ಹೆಸರು : MARUTI , PC 17678

ಈ ವಾಹನದ ಕೆಲಸದ ಸಂಖ್ಯೆ

ವಾಹನದ ಮಾದರಿ

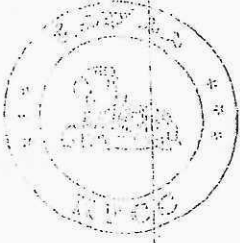
ಹೆಸರು: Unnikrish Kumar S M - PI
ಪೊಲೀಸ್ ಇನ್ಸ್‌ಪೆಕ್ಟರ್
ಪೊಲೀಸ್ ಕ್ರೀಮ್ ಫೋರ್ಸ್ ಟಾನ್
ಬೆಂಗಳೂರು ನಗರ

ಅಧಿಕಾರಿ: Superintendent of Police/Commissioner of Police

661

11

2
1900
1901
1902
1903



ಕರ್ನಾಟಕ ಚಲನಚಿತ್ರ ವಾಣಿಜ್ಯ ಮಂಡಳಿ (೮)

THE KARNATAKA FILM CHAMBER OF COMMERCE (8)

(FOUNDED IN 1944-REGD. UNDER KARNATAKA SOCIETIES REGN. ACT)

(THE APEX BODY OF KARNATAKA FILM INDUSTRY)

E-mail : karnatakafilmmhouse@yahoo.com Website : www.thekfcc.com

123

#1

73

DOCUMENT NO

ಇದರಲ್ಲಿ :
1. ವಾಚನಗಳು
2. ...
3. ...
4. ...
5. ...
6. ...
7. ...
8. ...
9. ...
10. ...
11. ...
12. ...
13. ...
14. ...
15. ...
16. ...
17. ...
18. ...
19. ...
20. ...
21. ...
22. ...
23. ...
24. ...
25. ...
26. ...
27. ...
28. ...
29. ...
30. ...
31. ...
32. ...
33. ...
34. ...
35. ...
36. ...
37. ...
38. ...
39. ...
40. ...
41. ...
42. ...
43. ...
44. ...
45. ...
46. ...
47. ...
48. ...
49. ...
50. ...
51. ...
52. ...
53. ...
54. ...
55. ...
56. ...
57. ...
58. ...
59. ...
60. ...
61. ...
62. ...
63. ...
64. ...
65. ...
66. ...
67. ...
68. ...
69. ...
70. ...
71. ...
72. ...
73. ...
74. ...
75. ...
76. ...
77. ...
78. ...
79. ...
80. ...
81. ...
82. ...
83. ...
84. ...
85. ...
86. ...
87. ...
88. ...
89. ...
90. ...
91. ...
92. ...
93. ...
94. ...
95. ...
96. ...
97. ...
98. ...
99. ...
100. ...

ಕ್ರಮ ಸಂಖ್ಯೆ: P/12/20/004

ದಿನಾಂಕ: 21-3-2026

ಶ್ರೀ ಪ್ರತಾಪ್ ಎನ್ ✓
ಮಾನ್ಯ ವಕೀಲರು
ಮೆ: ಧೀ ಇಂಕ್. ಅಡ್ವೋಕೇಟ್ಸ್ & ಸಾಲಿಸಿಟರ್ಸ್
ಬೆಂಗಳೂರು.

By Rajesh P. A. A. A.

ಮಾನ್ಯರೇ,

ಉಲ್ಲೇಖ: ತಮ್ಮ ಪತ್ರ ದಿನಾಂಕ 17-3-2026. (ಸ್ವೀಕೃತಿ 18-3-2026)

ಮೇಲ್ಕಂಡ ಉಲ್ಲೇಖಿತ ಪತ್ರದಲ್ಲಿ ತಾವು ಕೋರಿರುವ ಶ್ರೀ ಅನಿಲ್ ಗುಡಿಗೇರಿ, ಸಿರಿ ಮೊದಲಾದವರು ಈ ಸಂಸ್ಥೆಯ ಹೆಸರಿನಲ್ಲಿ 'ಬಾಸ್' ಶೀರ್ಷಿಕೆಯನ್ನು ನಮ್ಮ ದಾಖಲೆಗಳ ಪ್ರಕಾರ ಕರ್ನಾಟಕ ಚಲನಚಿತ್ರ ವಾಣಿಜ್ಯ ಮಂಡಳಿಯಲ್ಲಿ ನೋಂದಣಿ ಮಾಡಿರುವುದಿಲ್ಲ ಹಾಗೂ ಸದಸ್ಯತ್ವ ಹೊಂದಿರುವುದಿಲ್ಲ ಎಂದು ದೃಢೀಕರಿಸುತ್ತಿದ್ದೇವೆ.

ಈ ಸಂಬಂಧವಾಗಿ ತಾವು ಕರ್ನಾಟಕ ಚಲನಚಿತ್ರ ವಾಣಿಜ್ಯ ಮಂಡಳಿಗೆ ಭೇಟಿ ನೀಡಿ ಸಂದರ್ಭದಲ್ಲಿ ಕಾರ್ಯದರ್ಶಿಯಾದ ನಾನು ಈಗಾಗಲೇ ಮೇಲ್ಕಂಡ ಸಂಸ್ಥೆಯ ಹೆಸರಿನಲ್ಲಿ 'ಬಾಸ್' ಶೀರ್ಷಿಕೆ ನೋಂದಣಿ ಆಗಿರುವುದಿಲ್ಲ ಎಂಬ ವಿಷಯವನ್ನು ತಮಗೆ ತಿಳಿಸಿರುತ್ತೇನೆ.

ವಂದನೆಗಳೊಡನೆ,

ತಮ್ಮ ವಿಶ್ವಾಸಿ,
ಕರ್ನಾಟಕ ಚಲನಚಿತ್ರ ವಾಣಿಜ್ಯ ಮಂಡಳಿ ಪರವಾಗಿ,

A. G. A.
(ಎ ಗಣೇಶ್)
ಗೌ. ಕಾರ್ಯದರ್ಶಿ

ಪ್ರತಿಯನ್ನು:- ಶ್ರೀಮತಿ ವಿಜಯಲಕ್ಷ್ಮಿ ದರ್ಶನ್
#217, ತೊಗುದೀಪ ನಿಲಯ, ಎಫ್ ರಸ್ತೆ, ಐಡಿಯಲ್ ಹೋಮ್ ಟೌನ್ ಶಿವ್
ರಾಜರಾಜೇಶ್ವರಿ ನಗರ, ಬೆಂಗಳೂರು-560 098

103

1

#109 (12th)



Case & Case State

Case

Case

Case Number: WP 24836/2024
(WP)(2024/2024)

Classification: GM RES

Date of Filing: 09/09/2024
13:42:35

Petitioner: MR DARSHAN

Petitioner Advocate: PRATHAM
N

Respondent: UNION OF INDIA

Respondent Advocate:
RESHMA K T

Filing No: WP 24654/2024

Judge: HEMANT
CHANDANGOUDAR

Last Posted For: FRESH

Last Date of Action: 10/09/2024

Last Action Taken: NOTICE

Next Hearing Date:

Daily Orders: WP 24836/2024

10/09/2024

HEMANT CHANDANGOUDAR

#13 125

respondents as respondents 2 to

Sri Prabhulinga Navadgi, learned Senior Counsel representing the petitioner's counsel submits that the Bombay High Court in the case of Nilesch Navalakha & ors. -vs- Union of India - (2021) SCC OnLine Bom 56 has restrained the press/media from printing/displaying any news item and/or initiating any discussion/debate/interview of the nature, as indicated hereunder:

- a. In relation to death by suicide, depicting the deceased as one having a weak character or intruding in any manner on the privacy of the deceased;
- b. That causes prejudice to an ongoing inquiry/investigation:
 - i) Referring to the character of the accused/victim and creating an atmosphere of prejudice for both;
 - ii) Holding interviews with the victim, the witnesses and/or any of their family members and displaying it on screen;
 - iii) Analyzing versions of witnesses, whose evidence could be vital at the stage of trial;
 - iv) Publishing a confession allegedly made to a police officer by an accused in trying to make the public believe that the same is a piece of evidence which is admissible before a Court and there is no reason for the Court not to act upon it, without letting the public know the nitty-gritty of the Evidence Act, 1872;
 - v) Printing photographs of an accused and thereby facilitating his identification;
 - vi) Criticizing the investigative agency based on half-baked information without property research;
 - vii) Pronouncing on the merits of the case, including pre-judging the guilt or innocence of an accused or an individual not yet wanted in a case, as the case may be;
 - viii) Recreating/reconstructing a crime scene and depicting how the accused committed the crime;
 - ix) Predicting the proposed/future course of action including steps that ought to be taken in a particular direction to complete the investigation; and
 - x) Leaking sensitive and confidential information from materials collected by the investigating agency;
- c. Acting in any manner so as to violate the provisions of the programme Code as prescribed under section 5 of the CTVN Act read with rule 6 of the CTVN Rules and thereby inviting contempt of court; and
- d. Indulging in character assassination of any individual and thereby mar his reputation."

However, the Electronic Media contrary to the guidelines are broadcasting on their respective channels prejudice to the case of the petitioner - accused in Crime No.0250/2024. He further submits that in an identical circumstances, the Delhi High Court in the case State of NCT Delhi -vs- Union of India and ors. - (W.P. (Crl.) 1090/2023 has directed the respondent No.1-Union of India to pass appropriate orders to media agencies from publishing, printing and disseminating confidential information contained in the charge sheet and the other such material collect during the course of information in relation to the case FIR No.659/2022 and shall ensure that guidelines such issued be complied with.

Learned Senior Counsel further submits that the wife of the petitioner had filed a suit in O.S.No.6082/2024 for permanent injunction against the media channels and the jurisdictional Civil Court by order dated 27.08.2024 restrained the defendants therein by way of ex-parte ad-interim temporary injunction order, from airing, printing, publishing any statement in relation to the investigation being undertaken by Kamakshipalya Police Station against Sri. Darshan Srinivas, who is arraigned as accused No.2 and from airing, printing, publishing any statement about the final reports, confessional statements and holding debate/discussion/interview on the final report pertaining to FIR No.0250/2024 pending adjudication before the XXIV ACMM Court, Bengaluru. Despite the ex-parte ad-interim order granted, the media channels continue to air, print, publish and disseminate the

confidential information contained in the charge sheet in relation to the said crime.

126

The Hon'ble Supreme Court in the case of Sidhartha Vashisht Alias Manu Sharma vs. State (NCT of Delhi) - (2010) 6 SCC 1, has ruled that despite the significance of the print and electronic media in the present day, it is not only desirable but least that is expected of the persons at the helm of affairs in the field, to ensure that trial by media does not hamper fair investigation by the investigating agency and more importantly does not prejudice the right of defence of the accused in any manner whatsoever and it will amount to travesty of justice if either of this causes impediments in the accepted judicious and fair investigation and trial.

Clause (5) of the Cable Television Networks (Regulation) Act, 1995 states that no person shall transmit or re-transmit through a cable service any programme unless such programme is in conformity with the prescribed programme code.

Rule 6 of the Cable Television Networks Rules, 1994 narrates the program code and it states that, no programme should be carried in the cable service which:

(a) xxxxxxx

(b) xxxxxxx

(c) xxxxxxx

(d) Contains anything obscene, defamatory, deliberate, false and suggestive innuendos and half truths;

(e) xxxxxxx

(f) Contains anything amounting to contempt of court;

(g) xxxxxxx

(h) xxxxxxx

(i) Criticises, maligns or slanders any individual in person or certain groups, segments of social, public and moral life of the country;

(j) xxxxxxx

(k) xxxxxxx

(l) xxxxxxx

(m) xxxxxxx

(n) xxxxxxx

(o) xxxxxxx

Following the order of the Division Bench of this Court in W.P.No.7026/2021, the Government of Karnataka has issued a Circular dated 11.08.2021, whereby the following directions have been issued to the police personnel of Karnataka who have been entrusted with the task of investigation of any crime:

a) No police personnel shall brief and disclose to the print, electronic and social media about the nature of the investigation under progress, the materials collected during the investigation, before completion of the entire investigation and before acceptance of final report of the investigation by the competent jurisdictional courts.

b) No police personnel shall disclose and share the identity of the complainant and the accused in connection with the crime under investigation, to the print, electronic and social media until the completion of the investigation and before acceptance of final report of the investigation by the competent jurisdictional courts.

c) All police personnel in the State should strictly adhere to the guidelines issued through this Circular, in addition to the Circulars instructions that have been already issued by the DG&IGP has referred above.

d) Any lapses in this regard by any police personnel will be viewed seriously and it would attract immediate

#45

127

by the concerned disciplinary authority.

e) Any lapses in this regard will be considered as a serious misconduct on the part of concerned officer and in addition to disciplinary action against such officer, if warranted, criminal action may also be initiated against such officers.

f) However, the information relating to registration of FIR can be disseminated as per the direction of Hon'ble Supreme Court of India in WP.(CRL) No.68/2016 and in the light of section 41C of the CrPC. Except for the compliance of section 41C and directions of Hon'ble Supreme Court of India in WP.(CRL) No.68/2016, the instructions / directions issued in the present Circular would be applicable in full force and strict sense."

Sri Aravind Kamath, learned Additional Solicitor General for the respondent No.1 submits that if complaint is filed, an appropriate action will be taken in accordance with law.

Petitioner has established a prima facie case to grant an ex-parte interim order.

Accordingly, I pass the following:

ORDER

(i) Respondents 3 to 40 are hereby restrained from publishing, printing, airing and disseminating confidential information contained in the charge sheet in relation to Crime No. 0250/2024 registered by the Kamakshipuram Police Station, till the next date of hearing.

(ii) Respondent No.1 to communicate this order to respondents 3 to 40.

Needless to state that respondent No.1 to take appropriate action against respondents 3 to 40, if they broadcast, print, air or publish any statements in violation of the Cable Television Networks Rules, 1994.

Issue emergent notice to respondents 3 to 40.

Last Updated On: 2024-09-10 15:00:22

09/09/2024

HEMANT CHANDANGODAR

The learned Additional Government Advocate accepts notice for the respondent No.2. ~~116~~ (128)
Sri Prabhulinga Navadgi, learned Senior Counsel representing the petitioner's counsel submits that the Bombay High Court in the case of Nilesch Navalakha & ors. -vs- Union of India - (2021) SCC OnLine Bom 56 has laid down the following guidelines:

- a. In relation to death by suicide, depicting the deceased as one having a weak character or intruding in any manner on the privacy of the deceased;
- b. That causes prejudice to an ongoing inquiry/investigation:
 - i) Referring to the character of the accused/victim and creating an atmosphere of prejudice for both;
 - ii) Holding interviews with the victim, the witnesses and/or any of their family members and displaying it on screen;
 - iii) Analyzing versions of witnesses, whose evidence could be vital at the stage of trial;
 - iv) Publishing a confession allegedly made to a police officer by an accused and trying to make the public believe that the same is a piece of evidence which is admissible before a Court and there is no reason for the Court not to act upon it, without letting the public know the nitty-gritty of the Evidence Act, 1872;
 - v) Printing photographs of an accused and thereby facilitating his identification;
 - vi) Criticizing the investigative agency based on half-baked information without proper research;
 - vii) Pronouncing on the merits of the case, including pre-judging the guilt or innocence of an accused or an individual not yet wanted in a case, as the case may be;
 - viii) Recreating/reconstructing a crime scene and depicting how the accused committed the crime;
 - ix) Predicting the proposed/future course of action including steps that ought to be taken in a particular direction to complete the investigation; and
 - x) Leaking sensitive and confidential information from materials collected by the investigating agency;
- c. Acting in any manner so as to violate the provisions of the programme Code as prescribed under section 5 of the CTVN Act read with rule 6 of the CTVN Rules and thereby inviting contempt of court; and
- d. Indulging in character assassination of any individual and thereby mar his reputation."

However, the Electronic Media contrary to the guidelines are broadcasting on their respective channels adverse to the (prejudice to the case of the petitioner - accused in Crime No.0250/2024. He further submits that in an identical circumstances, the Delhi High Court in the case State of NCT Delhi -vs- Union of India and ors. - (WP (C) 1090/2023 has directed the respondent No.1-Union of India to pass appropriate orders to media agencies from publishing, printing and disseminating confidential information contained in the charge sheet and the other such material collect during the course of information in relation to the case FIR No.659/2022 and shall ensure that guidelines such issued be complied with.

Sri Aravind Kamath, learned Additional Solicitor General for the respondent No.1 submits that if complaint is filed an appropriate action will be taken in accordance with law.

In the absence of complaint/representation, a direction as sought for by the petitioner cannot be issued
List on 10.9.2024.

Last Updated On: 2024-09-10 10:15:26

#7 129

79

IN THE COURT OF THE X ADDL. CITY CIVIL &
SESSIONS JUDGE, BENGALURU (CCH-26)

Dated this the 19th day of June, 2024

Present

Sri. Vijaya Kumar Rai, B.Com., LL.B.,
X Addl. City Civil & Sessions Judge,
Bengaluru.

O.S. No.4267/2024

Plaintiff:

Smt. Vijayalakshmi Darshan
w/o Sri Darshan Srinivas
aged about 43 years
r/at #217, Thoogu Deepa Nilaya
F Road, Ideal Home Township
Rajarajeshwari Nagar
Bengaluru-560 098

Vs.

Defendants:

Indian Express
502, Devatha Plaza, 5th Floor
131, Residency Road
Bengaluru-560 025
Rep. By Editor in Chief

and 37 others

I.A. No.1

Applicant :

Smt. Vijayalakshmi Darshan - Plaintiff

v/s

Opponents :

Indian Express & others - Defendants

Provision under which the application is filed - U/O-XXXIX R 1 & 2
CPC

Relief sought for - Interim exparte TI

The date on which the application is filed - 18.06.2024

Number of the application - I.A.No.1

The date on which the objections are filed by
different opponents -

The date on which the orders were passed on
the said application - 19.06.2024

~~118~~ (130)

(80)

INTERIM ORDER ON I.A. No.1

I.A.No.1 is filed by the plaintiff to restrain the defendants from printing, publishing or telecasting defamatory statements against her, her husband and family members in relation to the investigation being undertaken by Kamakshipalya Police Station against her husband who is arrayed as accused No.2 in Crime No.250/2024, pending adjudication before the 24th Addl. Chief Metropolitan Magistrate, Bengaluru.

2. It is stated that husband of the plaintiff is arrayed as an accused along with others in connection of death of a person and therefore the husband of the plaintiff is in custody of the Police allegedly being responsible for the murder in connection with the case registered by Kamakshipalya Police, Bengaluru and though the investigation is underway the defendants Media is making charges against the plaintiff's husband and gone to the extent of calling him as a murderer though the investigation is at a preliminary stage. It is also stated that the defendants- electronic media are triggering debates which has defamed the plaintiff and her family. It is further stated that the defendants are fabricating the news and trying to show in the media that plaintiff and her husband are heading towards separation and the plaintiff's husband and plaintiff do not have a healthy relationship as husband and wife and therefore such uncorroborated statements have deeply

impacted the family bonding of the plaintiff's family. It is also stated that plaintiff's son was deeply hurt from such false and fabricated statements and plaintiff's son has even expressed his dismay and disbelief over the statements made in the social media. It is also stated that the defendants are also airing an alleged telephonic conversation between two police officers discussing about the acts said to be committed by the plaintiff's husband and it is nothing but pure media trial which cannot be done for the purpose of tarnishing the image and reputation of the plaintiff and her family. It is also stated that the applications and news has affected the right of free fair and investigation of the trial and therefore an order of ex parte temporary injunction is required to prevent the defendants from printing, telecasting and publishing the defamatory statements against the plaintiff and her family.

3. Heard the learned Senior Counsel Sri Prabhuling Navadagi appearing on behalf of the plaintiff.

4. The point for determination of the Court is-

"Whether the plaintiff has made out grounds to grant an ex parte temporary injunction order?"

5. The finding of this Court on the above point is in the affirmative for the following:-

~~130~~ (132)

(82)

- : REASONS : -

6. As per the materials available on record, the Kamakshipalya Police have registered a case against the husband of the plaintiff and others for the offence of murder and other connected offences. The husband of the plaintiff happens to be a film actor. The materials produced by the plaintiff at this stage prima-facie reflects that the publications and telecasts made so far by the defendants not only with regard to the details of the investigation conducted by the Police but also the family relationship of the plaintiff with her husband.

7. The specific contention of the plaintiff is that the defendants are fabricating false and defamatory statements that the plaintiff and her husband are heading towards marital separation and they do not share any healthy relationship as husband and wife. It is further contended that such uncorroborated and false statements have deeply impacted the family bonding of the plaintiff with her husband and also their son. There is prima-facie materials to that effect.

8. Needless to mention that family relationship of the plaintiff and her husband are personal matters of the plaintiff and her husband and therefore the defendants cannot debate on that and make defamatory statements. In the decision of our Hon'ble High Court rendered in case of A.K. Subbaiah v/s N. Garudachar

#1 133

23

ILR 1987 Page 100 Karnataka, our Hon'ble High Court has held that the reputation is most valuable to any person and it is much more valuable than any amount of money or anything else in the world. The Hon'ble High Court has further held that merely because the law recognizes the truth or justification as a defence, it does not give the media the right to speak anything that likes. In the judgment of the Hon'ble Supreme Court rendered in the case of Omprakash Chautala v/s Kanwar Bhan and others (2014)5 SCC 417 the Hon'ble Supreme Court has held that when reputation is hurt, a man is half-dead. Therefore the defendants are required to consider the right of reputation of the plaintiff and her family while telecasting or publishing the news in connection to the offences in which her husband said to be involved.

9. Learned Senior Counsel has also brought to the notice of the Court the Circular issued by the Govt. of Karnataka in No.HD-59/SST/2021 dated 11.08.2021 pursuant to the direction of Hon'ble High Court passed in a Public Interest Litigation in WP No.7026/2021/PIL wherein the Hon'ble High Court has made it clear that before completion of the investigation the Police Officers shall not divulge the nature of the investigation and prohibited from disclosing the identity of the complainant and accused. The Govt has specifically directed that no police officers shall brief and disclose to the print and electronic or social media about the nature

~~1507~~ (134)

(84)

of the investigation under progress and also the materials collected during the investigation except disseminating the information relating to the registration of the FIR. It is contended that inspite of this, the defendants are illegally publishing incorrect information which is nothing but media trial affecting free and fair investigation. At this stage, there is sufficient force on the submission made by the learned Senior Counsel. No doubt the criminals can be exposed and offences cannot be viewed lightly, but in the guise of exposing the offences, the personal life, liberty and reputation of a person cannot be marred. It shall be noted that the investigation has not been completed and therefore it is too premature to the defendants to express any opinion about the guilt or otherwise of the husband of the plaintiff. It is well settled law that the doubts how so ever high it will not substitute the proof. Hence it is too premature to the defendants to express any opinion about the guilt or otherwise of her husband in the alleged crime. It is highly improper to publish or telecast the information and news as if he has committed the guilt. Having regard to these aspects, an order of exparte temporary injunction is very much necessary. If notice is issued it takes time and in the interregnum period there will be further publications and telecasting of the news which would damage the reputation of the plaintiff and her husband. Therefore if notice is issued, the very object of granting an order of exparte

~~143~~ 135

85

temporary injunction would be defeated by delay. Hence, the above point is answered in the affirmative and the following order is passed:-

ORDER

The defendants, their reporters, anchors or any other persons claiming on behalf of them are restrained from printing, publishing, telecasting the news or any other information touching the personal and family life of the plaintiff, her husband Darshan Srinivas or publishing or telecasting any unauthenticated information/opinion in connection with the investigation in Crime No.250/2024 conducted by Kamakshipalya Police Station.

(Dictated to the Senior Sheristedar through Dictaphone recorded by me, transcribed by him on Computer, carried out corrections, taken print out and then then pronounced in the Open Court on this the 19th day of June, 2024).

(Vijaya Kumar Rai)
X Addl. City Civil & Sessions Judge
Bengaluru.

#136

CIVIL AND SESSIONS JUDGE

Court Of: CCH26 X ADDL. CITY CIVIL AND SESSIONS JUDGE

Case Number: KABC010220032024

Case Title: O.S./0006082/2024

Date: 26-08-2024

SHAYALAKSHMI DARSHAN Versus INDIAN EXPRESS

Daily Status

Business	Next Purpose	Next Hearing Date
<p>INTERIM ORDER ON IA. NO.1 This I.A. No.1 is filed by the plaintiff under Order XXXIX Rule 1 and 2 of Code of Civil Procedure, 1908 to restrain the defendants from airing, printing, publishing any statement in relation to the investigation being under taken by Kamakshipalya police station against Sri. Darshan Srinivas who is arrayed as accused No.2 in FIR No.0250/2024 and from making any statement from airing, printing, publishing any statement about the final report inter alia FSL reports, confidential statements and holding debate/ discussion/ interview on the said issue pending adjudication of the matter before XXIV ACMM Court, Bengaluru. 2. Heard learned Senior counsel appearing for the plaintiff on I.A. No.1. Perused the pleadings and the copies of the documents placed on record. 3. It is submitted by learned Senior counsel that on the guise of fair journalism, the defendant media houses are telecasting/ airing news claiming to have received credible information from the officers of the investigating team. It is the apprehension of the plaintiff that the investigating team is submitting final report and the defendants who are active in the process of securing the confidential information and sensitive aspects of the final report, may telecast the same in a derogatory and defamatory way in order to increase their TRP and thereby are holding media trials and are violating the right of fair trial to the accused enshrined under Article 21 of the Constitution. It is further submitted that under the guise of fair journalism the defendants are exposing probable evidence and are discussing the FSL report with the public which could be examined only by the investigating agency or by the competent courts, during the course of trial and the manner in which they are airing the issue amounts to media trials and sought to restrain the defendants by way of a parte ad-interim temporary injunction order. 4. Learned senior counsel appearing for the plaintiff has relied upon the judgment of the Division Bench of the Hon'ble High Court of Bombay in Nilesh Navalakha and others reported in 2021 SCC Online Bombay 56 wherein the Hon'ble High Court by considering the interest of the accused and the victim has held that no report/ discussion/ debate should be presented by the press/ media which could harm the interest of the accused being investigated or a witness and has also issued various guidelines to press media to refrain from printing/ displaying any news of the present nature. 5. Learned senior counsel has also brought to the notice of the Court about the circular issued by the Government of Karnataka in No.111/ 59 SSF 2021 dated 11-08-2021, where in instructions are given to prohibit disclosure of information regarding details of cases under investigation, based on the order passed by our Hon'ble High Court in W.P.No.7026/2021/PIL dated: 15-06-2021. It is the apprehension of the plaintiff that the investigation officer is submitting the charge sheet and the media/ press may secure the confidential information and sensitive aspects of the final report and telecast the same and it would prejudice the plaintiff. The copies of the news articles placed on record, shows the defendants are telecasting/ publishing news about the ongoing investigation, which is an utter disregard to the guidelines issued by Hon'ble High Courts. Hence in order to avoid the press/ media</p>	SUMMONS	04-11-2024

#5 (137)

(87)

aboutblank

Business	Next Purpose	Next Hearing Date
adjudication before XXIV ACMM Court, Bengaluru. This order shall remain in force till next date of hearing. Issue temporary injunction order if the same is complied under Order 39 Rule 3(A) of C.P.C. Issue temporary injunction order, suit summons and notice on I.A. No.1 to defendants No.1 to 38. R/by: 04.11.2024		

~~136~~ (138)

(8)

O.S.No. 7875/2024

also filed I.A.No.1 under Order XXXIX Rules 1 and 2 r/w/s 151 of the Code of Civil Procedure praying an ad-interim order of temporary injunction against the defendants No.1 to 7 restraining them from airing or printing; publishing unverified statement, any hearsay statement, any uncorroborated statement, any such statements that are factually incorrect or untrue against the plaintiff, his wife and son and his family members in any print media, newspaper, television channels, local cable operated channels, or internet / websites and electronic and personal social media handles, etc., of the defendant No.1 and other defendants.

Heard. Perused the plaint averments, I.A.No.I, affidavit and the documents produced on record. The documents i.e., the copies of the complaint, FIR and the screen shots of the statements of the defendant No.1 on electronic media and social media shows that, the plaintiff has prima facie case.

~~117~~ (139)



O.S.No. 7875/2024

also filed I.A.No.1 under Order XXXIX Rules 1 and 2 r/w/s 151 of the Code of Civil Procedure praying an ad-interim order of temporary injunction against the defendants No.1 to 7 restraining them from airing or printing; publishing unverified statement, any hearsay statement, any uncorroborated statement, any such statements that are factually incorrect or untrue against the plaintiff, his wife and son and his family members in any print media, newspaper, television channels, local cable operated channels, or internet / websites and electronic and personal social media handles, etc., of the defendant No.1 and other defendants.

Heard. Perused the plaint averments, I.A.No.I, affidavit and the documents produced on record. The documents i.e., the copies of the complaint, FIR and the screen shots of the statements of the defendant No.1 on electronic media and social media shows that, the plaintiff has prima facie case.

~~158~~ 140

970

O.S.No. 7875/2024

At this stage, the plaintiff has made out prima facie case for grant of interim order of injunction. In the event if notice is issued to the defendants No.1 to 7, very purpose of the suit would be defeated. Hence, notice to the defendants No.1 to 7 on I.A.No.1 is dispensed and I proceed to pass the following:

ORDER

Issue ad-interim order of temporary injunction by temporarily restraining defendants No.1 to 7 from airing or printing; publishing unverified statement, unauthenticated information or opinion which lowers' the image of the plaintiff in any print media, newspaper, television channels, local cable operated channels, or internet / websites and electronic and social media till the next date of hearing.

~~149~~ (141)

(9)

O.S.No. 7875/2024

The plaintiff shall comply Order
XXXIX Rule 3(a) of the C.P.C.

Issue suit summons and exparte T.I.
order to the defendants No.1 to 7
returnable by 11.12.2024.

In the event sufficient process fee,
plaint and I.A. copies are not furnished
within three working days from the date
of this order, the interim order stands
automatically vacated without any
further orders.

(K.SRIVIDYA),
XLII A.C.C. & S.J., Bengaluru.

DHEE Inc.

ADVOCATES & SOLICITORS

142
#10

92

DOCUMENT

BY REGISTERED POST A.D. / SPEED POST WITH
ACKNOWLEDGEMENT DUE (AND BY ELECTRONIC MAIL
WHEREVER OFFICIAL EMAIL IS AVAILABLE)

Date: 18 March 2026

To,

The Hon'ble President & Secretary,
Kannada Film Chamber of Commerce,
#13, 2nd Floor,
KLM Towers Bengaluru - Mysore Highway
Kengeri Main Road,
Bengaluru 560 060
Karnataka.

Also at:

06, 1st Floor Grand Majestic Mall,
opposite, Gubbiveeranna Ranga Mandir,
2nd Cross, Gandhinagar,
Bengaluru - 560009

SUBJECT: Humble Requisition and Detailed Representation seeking (i) non-clearance / refusal of the title "BOSS", (ii) non-issuance or non-processing of any distribution licence, exhibition permission or allied approvals under the Karnataka Cinemas (Regulation) Act, 1964 and Rules thereunder, and (iii) a kind direction to the producers to forthwith surrender and submit to your esteemed Chamber the complete teaser, all banners, posters, trailers, stills and every piece of promotional material already created or released, pending final consideration -- in respect of the proposed Kannada feature film "BOSS" (Siri Productions, Director: V. Lava, Lead: Tanush Shivanna) -- on grounds of sensitivity to ongoing sub judice proceedings, protection of fair trial rights, privacy under Article 21, and larger interests of the Kannada film fraternity.

(142) 1st Floor, Grand Majestic Mall, Gandhinagar, Bengaluru - 560009
Contact: 9897054074, 9886063171, 9894682255
Email: Dheeinc@rediffmail.com

#1 (H3)

(93)

We act for and on behalf of our client, Mr. Darshan Srinivas (also known as Darshan Thoogudeepa Srinivas, "Challenging Star Darshan" or "D Boss"), aged about 47 years, son of Late Thoogudeepa Srinivas, residing at #217, Thoogu Deepa Nilaya, F-Road, Ideal Home Township, Rajarajeshwari Nagar, Bengaluru - 560 098 (hereinafter "our Client").

At the outset, we place on record our Client's profound respect, gratitude and emotional attachment to the Kannada film industry and your esteemed Chamber. Our Client's late father, Thoogudeepa Srinivas - a veteran actor, who served the Kannada Industry for nearly three decades. Our Client himself has carried forward this legacy since the early 2000s, having starred in over 50 films as a leading actor and producer, earning the affection of millions of fans and the respect of peers across generations. Together, father and son have been part of this fraternity for well over 50 years, always upholding the values of discipline, camaraderie and contribution to Kannada cinema. It is with immense reluctance, a heavy heart, and deep personal anguish that our Client approaches your good offices today. We repose complete faith in your Chamber's wisdom, fairness, and time-honoured tradition of safeguarding the interests of artistes, especially in times of personal distress and legal sensitivity.

1. Ongoing Sub Judge Criminal Trial - Detailed Background Our Client stands arraigned as Accused No. 2 in Crime No. 0250/2024 (commonly referred to as the Renukaswamy murder case), registered on 09.06.2024 at Kamakshipalya Police Station, Bengaluru, initially under Sections 302 and 201 of the Indian Penal Code (now corresponding provisions of the Bharatiya Nyaya Sanhita). The charge-sheet was filed on or before 04.09.2024, charges were formally framed on or about 03.11.2024, and the trial is actively proceeding on a day-to-day basis before the competent Sessions Court, Bengaluru. Key stages include ongoing evidence recording, with depositions from the victim's parents having taken place in December 2025 and further proceedings continuing as of March 2026. The matter involves grave and sensitive allegations, yet the presumption of innocence remains sacrosanct under law, and the trial demands an atmosphere free from external prejudice or sensationalism.
2. Protective Judicial Orders Already in Place- Recognizing the potential for media trial and invasion of privacy, multiple

~~H02~~ (MH)

(96)

courts have granted restraining orders to safeguard our Client's fundamental rights under Article 21 (right to life, dignity, privacy and fair trial):

- o O.S. No. 4267/2024 (filed by Client's wife): Interim order dated 19.06.2024 restraining unauthenticated or defamatory content related to personal/family life or the investigation.
- o O.S. No. 6082/2024: Ex-parte ad-interim injunction dated 27.08.2024 (communicated 28.08.2024) prohibiting publication of statements on investigation details, charge-sheet, FSL reports, confessions, debates or predictions on merits.
- o W.P. No. 24836/2024 (High Court of Karnataka): Interim order dated 10.09.2024 restraining dissemination of charge-sheet or confidential information, with directions to the Ministry of Information & Broadcasting.
- o O.S. No. 7875/2024: Ad-interim injunction dated 11.11.2024 restraining unverified statements lowering image across print, TV, internet and social media.
- o W.P. No. 7473/2025 against the Ministry of Information & Broadcasting. Certified copies / relevant extracts are enclosed as **Annexure-A series** for your kind perusal.

3. Details of the Proposed Film "BOSS" and Promotional Content
Our Client's family has recently become aware, through public sources and media reports, of a forthcoming Kannada feature film titled "BOSS" under the Siri Productions banner (produced by Anil Gudigekere, written and directed by V. Lava - a qualified advocate - with lead actor Tanush Shivanna, and supporting roles by Payal Chengappa and Vandita). The teaser was publicly unveiled/launched around 09.03.2026 amid a press meet, with a tentative theatrical release proposed for 14.04.2026. The teaser (approximately 2-3 minutes in duration) and associated promotional materials (banners, posters, interviews, press footage) include the following striking elements:

- o A central celebrity figure nicknamed "Boss" (with fans addressing him as such) depicted in a narrative involving the killing of a fan/follower.
- o Visual and thematic similarities in the portrayal of the victim and circumstances leading to the incident.

~~143~~

145

95

- Scenes of arrest, police investigation, interrogation, and claims of innocence, all set against a Bengaluru backdrop.
 - An explicit opening disclaimer stating "Inspired by true events". Public discourse – including media articles, social media reactions, viewer comments and trending discussions post-teaser release – has widely interpreted the film as drawing direct inspiration from, or capitalizing on, the facts and publicity surrounding Crime No. 0250/2024. Director V. Lava has publicly acknowledged in interviews (March 2026) that the storyline draws from real societal events of 2024–2025 and the ongoing trial, while expressing willingness to defend any legal challenge. Relevant teaser video (4K format), press-meet excerpts, promotional articles/interviews and sample public reactions are enclosed as **Annexure-B series** for your esteemed Chamber's careful examination.
4. Role of Your Esteemed Chamber and Link to Statutory Framework Your Chamber has long been the apex recognised industry body for title registration, clearance and dispute resolution in the Kannada film sector. Producers routinely seek and obtain title clearance / No Objection from KFCC before proceeding to production, distribution or exhibition. It is pertinent to state that similar requisition has been made to the Deputy Commissioner, Bengaluru seeking the relief not to issue License for film exhibition. Proceeding with clearance or facilitation in the face of these grave sensitivities could inadvertently contravene free and fair trial, public policy, judicial restraints, and the larger interest of maintaining decorum in the industry.
5. Humble Requisition – Grounds and Prayer: In light of the above – particularly the ongoing day-to-day trial, multiple protective court orders, potential for prejudice to fair trial rights, invasion of privacy/dignity under Article 21, and the emotional toll on our Client's family – we most respectfully implore your esteemed Chamber to extend its benevolent intervention.

WHEREFORE our Client humbly and earnestly prays that your esteemed Chamber may be pleased to:

~~144~~ (146)

(96)

- a. Kindly grant non-clearance / refuse registration or clearance of the title "BOSS" and reject any pending or forthcoming application in that regard;
- b. Kindly refrain from issuing, processing or facilitating any distribution licence, exhibition permission, theatre booking approval or allied sanction under the Karnataka Cinemas (Regulation) Act, 1964 or otherwise in respect of the proposed film "BOSS", pending full and final consideration of this requisition;
- c. Kindly direct the producers of the film "BOSS" (Siri Productions / Anil Gudigekere / V. Lava and all associated entities) to forthwith surrender and submit to your esteemed Chamber - in physical or digital form as appropriate - the complete teaser, all banners, posters, trailers, stills and every piece of promotional material already created or released (including any variants or additional content), pending final consideration and decision on this requisition, so as to enable your Chamber to independently examine the content, assess its implications, and arrive at an informed and equitable view in the best interests of justice, fraternity and public sensitivity.

We are fully confident that your Chamber - which has steadfastly protected the dignity of artistes, resolved disputes with equity, and upheld the cultural sanctity of Kannada cinema for decades - will extend its compassionate and judicious hand in this matter of profound personal and professional significance to our Client. Your kind intervention at this juncture would be seen as an act of true guardianship and would earn the everlasting gratitude of our Client and his family.

This requisition is submitted with the deepest respect and without prejudice to our Client's rights and contentions in the pending criminal and civil proceedings.

We shall be most obliged if you could kindly acknowledge receipt and communicate the action taken at the earliest convenience.

Yours most respectfully and gratefully,

PRATHAM N
Advocate,

For DHEE Inc. Advocates & Solicitors

#66 (147)

(97)

Enclosures:

- Annexure - A Series: Certified copies/extracts of protective court orders.
- Annexure - B Series: Teaser (DVD/USB/4K link), promotional materials, press meet video, articles/interviews (March 2026).
- Annexure - C: FIR in Crime No. 0250/2024.
- Annexure - D: FIR No. 69/2025.

Copy to:

SHRI. JAGADEESHA G, IAS,
Hon'ble Deputy Commissioner & District Magistrate,
Bengaluru Urban District,
Kempegowda Road,
Behind Kandaya Bhavana,
Bengaluru - 560 009, Karnataka.

#66 (148)

92

HIGH COURT OF KARNATAKA

Date of Filing & Case Status



Case No: WP 7473/2026
 Classification: GM RES
 Date of Filing: 02/03/2026 10:28:41
 Petitioner: MR. DARSHAN SRINIVAS
 Petitioner Advocate: PRATHAM N
 Respondent: UNION OF INDIA
 Respondent Advocate: KUMAR M N
 Judge: REGISTRAR (RECRUITMENT)
 Last Date of Action: 11/03/2025
 Last Action Taken:
 For: HOFI-
 OFFICE-
 TIME
 Date:

Petitioner Details: WP 7473/2026

Respondent Details: WP 7473/2026

Petitioner	Address	Sl.No	Respondent	Address
MR. DARSHAN SRINIVAS	AGED ABOUT 47 YEARS, S/O. LATE THOOGUDEEPA SRINIVAS 217, THOOGU DEEPA NILAYA, F ROAD, IDEAL HOME TOWNSHIP, BAGARAJESHWARI NAGAR, BENGALURU, KARN KARNATAKA-560 098. Advocate: PRATHAM N 9183XXXX60 praXXXXXXXXX@gmail.com	1	UNION OF INDIA	MINISTRY OF INFORMATION AND BROADCASTING, ROOM NO. 655, A- WING, SHASTRI BHAWAN, NEW DELHI-110 001. REPRESENTED BY ITS SECRETARY Advocate: KUMAR M N 9448XXXX17 kmnXXXXXXXXX@gmail.com
		2	THE SECRETARY,	MINISTRY OF ELECTRONICS AND INFORMATION TECHNOLOGY (MEITY), ELECTRONICS MARKET 6 CGO COMPLEX, LODHI ROAD, NEW DELHI-110003 Advocate: KUMAR M N 9448XXXX17 kmnXXXXXXXXX@gmail.com

IN THE HIGH COURT OF KARNATAKA AT BENGALURU

ORDER SHEET PART - 1

PRMO:-WP 24654/2024

CASE NO:-WP 24836/2024 (GM RES)

Respondent:
UNION OF INDIA

Respondent Adv:

Date of Filing :09/09/2024

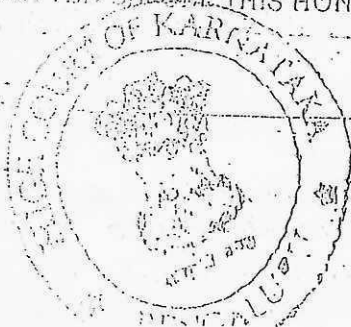
Plaintiff:
SRI HARSHAN SRINIVAS
SRI PRATHAM N

Office Notes

Orders of Court

09/09/2024 (Rs.100.00 - 09/09/2024)

THE PETITIONER FILED PRAYING TO
PASS APPROPRIATE ORDER
DIRECTING THE MEDIA AGENCIES FROM PUBLISHING
DISSEMINATING CONFIDENTIAL
MATERIAL CONTAINED IN THE CHARGE SHEET
COLLECTED DURING
INVESTIGATION IN RELATION TO
CHARGE SHEET IN FIR NO. 0250/2024
PENDING ADJUDICATION BEFORE XXIV
BENGALURU
OF MANDAMUS DIRECTING THE
NO.2 ABIDE BY THE CIRCULAR DATED
(ANNEXURE N) AND CONSEQUENTLY TO
APPROPRIATE ORDERS AGAINST THE
NO. 2 TO ENSURE THAT THE DIGITAL
EVIDENCE/CONFESSIONS/PHOTOGRAPHS
BY MEDIA HOUSES/NEWS
THROUGH UNAUTHORIZED MEANS IS
BEFORE THIS HONBLE COURT.



This Certified copy contains 09 Pages

And Copying charges of ₹ 127

Received

150

#108

100

WP NO. 24836/2024

IN THE HIGH COURT OF KARNATAKA AT BENGALURU
[MR. DARSHAN SRINIVAS VS. UNION OF INDIA AND ANOTHER]

10.09.2024

(VIDEO CONFERENCING / PHYSICAL HEARING)

CORAM: HON'BLE MR JUSTICE HEMANT CHANDANGUDAR

ORAL ORDER

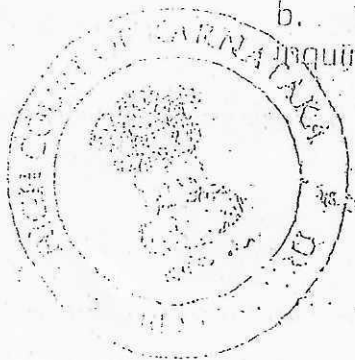
Learned counsel for the petitioner files a memo seeking impleadment of news channels/media houses/electronic media and other social platforms as co-respondents who are allegedly airing, printing and publishing the contents of the charge sheet in relation to Crime No.0250/2024 registered by the Kamakshipalya Police Station.

The memo is placed on record. Petitioner is permitted to implead the proposed respondents as respondents 3 to 40 and file the amended cause title.

Sri Prabhulinga Navadgi, learned Senior Counsel representing the petitioner's counsel submits that the Bombay High Court in the case of Nilesh Navalakha & ors. -vs- Union of India - (2021) SCC OnLine Bom 56 has restrained the press/media from printing/displaying any news item and/or initiating any discussion/debate/interview of the nature, as indicated hereunder:

"a. In relation to death by suicide, depicting the deceased as one having a weak character or intruding in any manner on the privacy of the deceased;

b. That... causes prejudice to an ongoing inquiry/investigation:



(10)

151

#69

Wp NO. 24836/2024

i) Referring to the character of the accused/victim and creating an atmosphere of prejudice for both;

ii) Holding interviews with the victim, the witnesses and/or any of their family members and displaying it on screen;

iii) Analyzing versions of witnesses, whose evidence could be vital at the stage of trial;

iv) Publishing a confession allegedly made to a police officer by an accused and trying to make the public believe that the same is a piece of evidence which is admissible before a Court and there is no reason for the Court not to act upon it, without letting the public know the nitty-gritty of the Evidence Act, 1872;

v) Printing photographs of an accused and thereby facilitating his identification;

vi) Criticizing the investigative agency based on half-baked information without proper research;

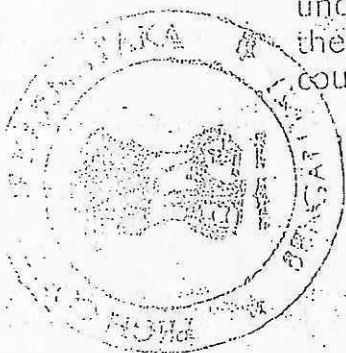
vii) Pronouncing on the merits of the case, including pre-judging the guilt or innocence of an accused or an individual not yet wanted in a case, as the case may be;

viii) Recreating/reconstructing a crime scene and depicting how the accused committed the crime;

ix) Predicting the proposed/future course of action including steps that ought to be taken in a particular direction to complete the investigation; and

x) Leaking sensitive and confidential information from materials collected by the investigating agency;

c. Acting in any manner so as to violate the provisions of the programme Code as prescribed under section 5 of the CTVN Act read with rule 5 of the CTVN Rules and thereby inviting contempt of court; and



152

- 3 -

~~170~~

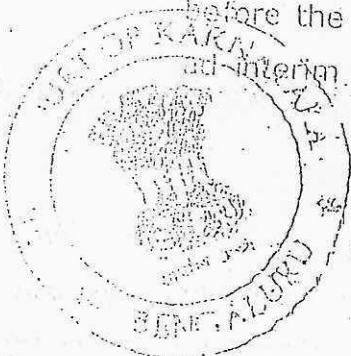
WP NO. 24836/2024

102

d. Indulging in character assassination of any individual and thereby mar his reputation."

However, the Electronic Media contrary to the guidelines are broadcasting on their respective channels prejudice to the case of the petitioner - accused in Crime No.0250/2024. He further submits that in an identical circumstances, the Delhi High Court in the case State of NCT Delhi -vs- Union of India and ors. - (WP (Cri.) 1090/2023 has directed the respondent No.1-Union of India to pass appropriate orders to media agencies from publishing, printing and disseminating confidential information contained in the charge sheet and the other such material collect during the course of information in relation to the case FIR No.659/2022 and shall ensure that guidelines such issued be complied with.

Learned Senior Counsel further submits that the wife of the petitioner had filed a suit in O.S.No.6082/2024 for permanent injunction against the media channels and the jurisdictional Civil Court by order dated 27.08.2024 restrained the defendants therein by way of ex-parte ad-interim temporary injunction order, from airing, printing, publishing any statement in relation to the investigation being undertaken by Ramakshipalya Police Station against Sri. Darshan Srinivas, who is arraigned as accused No.2 and from airing, printing, publishing any statement about the final reports, confessional statements and holding debate/discussion/interview on the final report pertaining to FIR No.0250/2024 pending adjudication before the XXIV ACMM Court, Bengaluru. Despite the ex-parte ad-interim order granted, the media channels continue to air





153

#1

WP NO: 24836/2014

print, publish and disseminate the confidential information contained in the charge sheet in relation to the said crime.

The Hon'ble Supreme Court in the case of Sidhartha Vashisht Alias Manu Sharma vs. State (NCT of Delhi) - (2010) 6 SCC 1, has ruled that despite the significance of the print and electronic media in the present day, it is not only desirable but least that is expected of the persons at the helm of affairs in the field, to ensure that trial by media does not hamper fair investigation by the investigating agency and more importantly does not prejudice the right of defence of the accused in any manner whatsoever and it will amount to travesty of justice if either of this causes impediments in the accepted judicious and fair investigation and trial.

Clause (5) of the Cable Television Networks (Regulation) Act, 1995 states that no person shall transmit or re-transmit through a cable service any programme unless such programme is in conformity with the prescribed programme code.

Rule 6 of the Cable Television Networks Rules, 1994 narrates the program code and it states that, no programme should be carried in the cable service which:

- (a) xxxxxxxx
- (b) xxxxxxxx
- (c) xxxxxxxx



154

#72

100

(d) Contains anything obscene, defamatory, deliberate, false and suggestive innuendos and half truths;

(e) xxxxxx

(f) Contains anything amounting to contempt of court;

(g) xxxxxxxx

(h) xxxxxxxx.

(i) Criticises, maligns or slanders any individual in person or certain groups, segments of social, public and moral life of the country ;

(j) xxxxxxxx

(k) xxxxxxxx

(l) xxxxxxxx

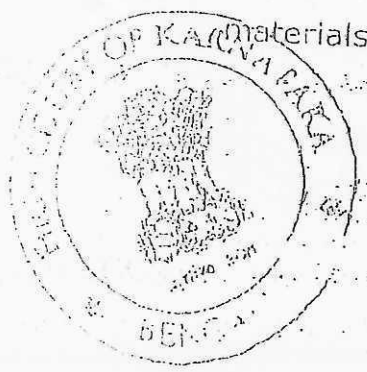
(m) xxxxxxxx

(n) xxxxxxxx

(o) xxxxxxxx

Following the order of the Division Bench of this Court in W.P.No.7026/2021, the Government of Karnataka has issued a Circular dated 11.08.2021, whereby the following directions have been issued to the police personnel of Karnataka who have been entrusted with the task of investigation of any crime:

- a) No police personnel shall brief and disclose to the print, electronic and social media about the nature of the investigation under progress, the materials collected during the investigation, before



105

155 173

WP NO. 24836/2024

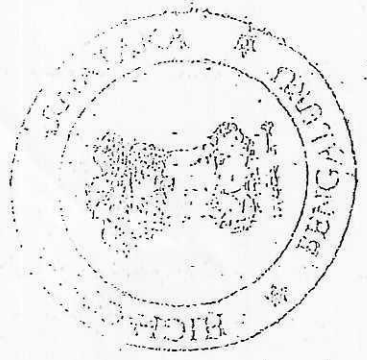
completion of the entire investigation and before acceptance of final report of the investigation by the competent jurisdictional courts.

b) No police personnel shall disclose and share the identity of the complainant and the accused in connection with the crime under investigation, to the print, electronic and social media until the completion of the investigation and before acceptance of final report of the investigation by the competent jurisdictional courts.

c) All police personnel in the State should strictly adhere to the guidelines issued through this Circular, in addition to the Circulars instructions that have been already issued by the DG&IGP has referred above.

d) Any lapses in this regard by any police personnel will be viewed seriously and it would attract immediate disciplinary action against such police personnel by the concerned disciplinary authority.

e) Any lapses in this regard will be considered as a serious misconduct on the part of concerned officer and in addition to disciplinary action against such officer, if warranted, criminal action may also be initiated against such officers.



156

177

105

f) However, the information relating to registration of FIR can be disseminated as per the direction of Hon'ble Supreme Court of India in WP.(CRL) No.68/2016 and in the light of section 41C of the CrPC. Except for the compliance of section 41C and directions of Hon'ble Supreme Court of India in WP.(CRL) No.68/2016, the instructions / directions issued in the present Circular would be applicable in full force and strict sense."

Sri Aravind Kamath, learned Additional Solicitor General for the respondent No.1 submits that if complaint is filed, an appropriate action will be taken in accordance with law.

Petitioner has established a prima facie case to grant an ex-parte interim order.

Accordingly, I pass the following:

ORDER

(i) Respondents 3 to 40 are hereby restrained from publishing, printing, airing and disseminating confidential information contained in the charge sheet in relation to Crime No. 0250/2024 registered by the Kamakshipalya Police Station, till the next date of hearing.

(ii) Respondent No.1 to communicate this order to respondents 3 to 40.



~~195~~

157

Needless to state that respondent No.1 to take appropriate action against respondents 3 to 40, if they telecast, print, air or publish any statements in violation of the Cable Television Networks Rules, 1994.

Issue emergent notice to respondents 3 to 40.



Sd/-
Judge

TRUE COPY
Section Officer
High Court of Karnataka
Bangalore-560 001

- a) The date on which the application was made..... 17/11/25
- b) The date on which charges and addl. charges if any, are called for..... 17/11/25
- c) The date on which the charges and addl. charges if any, are deposited..... 17/11/25
- d) The date on which copy is ready..... 17/11/25
- e) The date of notifying that the copy is ready for delivery..... 17/11/25
- f) The date on which copy is delivered to the applicant..... 15/11/25

Court Of: CCH26 X ADDL. CITY CIVIL AND SESSIONS JUDGE

Case Number: KABC010220032024

Case Number: O.S./0006082/2024

Date: 17-08-2024

VIJAYALAKSHMI DARSHAN Versus INDIAN EXPRESS

Daily Status

Business	Next Purpose	Next Hearing Date
<p>IN THE ORDER ON IA. NO.1 This I.A. No.1 is filed by the plaintiff under Order XXIV Rule 1 and 2 of Code of Civil Procedure, 1908 to restrain the defendants from airing, printing, publishing any statement in relation to the investigation being undertaken by Kamakshipalya police station against Sri. Darshan Srinivas who is charged as accused No.2 in FIR No.0250/2024 and from making any statement from airing, printing, publishing any statement about the final report inter alia FSL report, confessional statements and holding debate/ discussion/ interview on the matter pending adjudication of the matter before XXIV ACMM Court, Bangalore. 2. Heard learned Senior counsel appearing for the plaintiff on I.A. No.1. 3. Perused the pleadings and the copies of the documents placed on record. 3. It is submitted by learned Senior counsel that on the guise of fair journalism, the defendant media houses are telecasting/ publishing news claiming to have received confidential information from the officers of the investigating team. It is the contention of the plaintiff that the investigating team is submitting final report which contains confidential and sensitive aspects of the final report, may telecast the same in a derogatory and defamatory way in order to increase their TRP and thereby are holding media trials and are violating the right of fair trial to the accused enshrined under Article 21 of the Constitution. It is further submitted that under the guise of fair journalism the defendants are exposing probable evidence and are discussing the same with the public which could be examined only by the investigating officer before the competent courts, during the course of trial and the manner in which they are airing the issue amounts to media trials and sought to restrain the plaintiff by way of ex parte ad-interim temporary injunction order. 4. Learned Senior counsel appearing for the plaintiff has relied upon the judgment of the Hon'ble Bench of the Hon'ble High Court of Bombay in Nilesh Navalakha and others reported in 2021 SCC Online Bombay 56 wherein the Hon'ble High Court in balancing the interest of the accused and the victim has held that no report/ discussion/ debate should be presented by the press/ media which could harm the interest of the accused being investigated or a witness and has also issued various guidelines to press media to refrain from printing/ displaying any news of the present nature. 5. Learned senior counsel has also brought to the notice of the Court about the circular issued by the Government of Karnataka in No.HD-59 SST/2021 dated 11-08-2021, where in instructions are given to prohibit disclosure of information regarding details of cases under investigation, based on the order passed by our Hon'ble High Court in W.P.No.7026/2021/PIL dated: 15-06-2021. It is the apprehension of the plaintiff that the investigation officer is submitting the charge sheet and the media/ press may secure the confidential information and sensitive aspects of the final report and telecast the same and it would prejudice the plaintiff. 6. The copies of the news articles placed on record, shows the defendants are</p>	<p>SUMMONS</p>	<p>16-11-2024</p>

159

Business

~~177~~ 159

Purpose

Date

circulating/ publishing news about the ongoing investigation, which is an utter disregard to the guidelines issued by Hon'ble High Courts. Hence in order to avoid the press/ media from holding media trials which would prejudice both the accused and the victim, it is considered just and necessary to meet out the apprehension intended by the plaintiff. Thus, this Court is of opinion that the plaintiff has made out a prima facie case and the balance of convenience lies in favour of the plaintiff and the order of temporary injunction is not granted right of fair trial to the accused as provided under Article 21 of the Constitution will be violated. Hence, this Court proceeds to pass following : ORDER The defendants are hereby restrained by way of this ex-parte ad-interim TI order, from airing, printing, publishing any statement in relation to the investigation being under taken by Kamakshipalya Police against Sri. Jayhan Srinivas who is arrayed as accused No.2 and from airing, printing, publishing any statement about the final report inter alia FSL reports, confessional statements and holding debate/ discussion/ interview on the final report pertaining to I.P. No.0150/2024 pending adjudication before XXIV ACMM Court, Bengaluru. This order shall remain in force till next date of hearing. Issue temporary injunction order if the same is complied under Order 39 Rule 3(A) of C.P.C. Issue temporary injunction order, suit summons and notice on I.A. No.1 to defendants No.1 to 38. Date: 04.11.2024

~~178~~ 160

11

O.S.No. 7875/2024

ORDER

The plaintiff has filed this suit seeking perpetual prohibitory injunction relief. He has



011

~~179~~ (161)

O.S.No. 7875/2024

also filed I.A.No.1 under Order XXXIX Rules 1 and 2 r/w/s 151 of the Code of Civil Procedure praying an ad-interim order of temporary injunction against the defendants No.1 to 7 restraining them from airing or printing; publishing unverified statement, any hearsay statement, any uncorroborated statement, any such statements that are factually incorrect or untrue against the plaintiff, his wife and son and his family members in any print media, newspaper, television channels, local cable operated channels, or internet / websites and electronic and personal social media handles, etc., of the defendant No.1 and other defendants.

Heard. Perused the plaint averments. I.A.No.1, affidavit and the documents produced on record. The documents i.e., the copies of the complaint, FIR and the screen shots of the statements of the defendant No.1 on electronic media and social media shows that, the plaintiff has prima facie case.

180 160
112
O.S.No. 7875/2024

At this stage, the plaintiff has made out prima facie case for grant of interim order of injunction. In the event if notice is issued to the defendants No.1 to 7, very purpose of the suit would be defeated. Hence, notice to the defendants No.1 to 7 on I.A.No.1 is dispensed and I proceed to pass the following:

ORDER

Issue ad-interim order of temporary injunction by temporarily restraining defendants No.1 to 7 from airing or printing; publishing unverified statement, unauthenticated information or opinion which lowers' the image of the plaintiff in any print media, newspaper, television channels, local cable operated channels, or internet / websites and electronic and social media till the next date of hearing.

(13)

(11)

~~#81~~ (163)

O.S.No. 7875/2024

The plaintiff shall comply Order XXXIX Rule 3(a) of the C.P.C.

Issue suit summons and ex parte T.I. order to the defendants No.1 to 7 returnable by 11.12.2024.

In the event sufficient process fee, plaint and I.A. copies are not furnished within three working days from the date of this order, the interim order stands automatically vacated without any further orders.

(K.SRIVIDYA),
XLII A.C.C. & S.J., Bengaluru.

102 (164) 114

IN THE COURT OF THE X ADDL. CITY CIVIL &
SESSIONS JUDGE, BENGALURU (CCH-26)

Dated this the 19th day of June, 2024

Present

Sri. Vijaya Kumar Rai, B.Com., LL.B.,
X Addl. City Civil & Sessions Judge,
Bengaluru.

O.S. No.4267/2024

Plaintiff:

Smt.Vijayalakshmi Darshan
w/o Sri Darshan Srinivas
aged about 43 years
r/at #217, Thoogu Deepā Nilayā
F Road, Ideal Home Township
Rajarajeshwari Nagar
Bengaluru-560 098

Vs.

Defendants:

Indian Express
502, Devatha Plaza, 5th Floor
131, Residency Road
Bengaluru-560 025
Rep. By Editor in Chief

and 37 others

I.A. No.1

Applicant :

Smt.Vijayalakshmi Darshan - Plaintiff

v/s

Opponents :

Indian Express & others - Defendants

Provision under which the application is filed - U/O XXXIX R 1 & 2
CPC

Relief sought for - Interim exparte TI

The date on which the application is filed - 18.06.2024

Number of the application - I.A.No.1

The date on which the objections are filed by
different opponents

The date on which the orders were passed on
the said application - 19.06.2024

(115)

(110)

~~182~~ (165)

INTERIM ORDER ON I.A. No.1

I.A.No.1 is filed by the plaintiff to restrain the defendants from printing, publishing or telecasting defamatory statements against her, her husband and family members in relation to the investigation being undertaken by Kamakshipalya Police Station against her husband who is arrayed as accused No.2 in Crime No.250/2024, pending adjudication before the 24th Addl. Chief Metropolitan Magistrate, Bengaluru.

2. It is stated that husband of the plaintiff is arrayed as an accused along with others in connection of death of a person and therefore the husband of the plaintiff is in custody of the Police allegedly being responsible for the murder in connection with the case registered by Kamakshipalya Police, Bengaluru and though the investigation is underway the defendants Media is making charges against the plaintiff's husband and gone to the extent of calling him as a murderer though the investigation is at a preliminary stage. It is also stated that the defendants- electronic media are triggering debates which has defamed the plaintiff and her family. It is further stated that the defendants are fabricating the news and trying to show in the media that plaintiff and her husband are heading towards separation and the plaintiff's husband and plaintiff do not have a healthy relationship as husband and wife and therefore such uncorroborated statements have deeply

184 (166)

(16)

impacted the family bonding of the plaintiff's family. It is also stated that plaintiff's son was deeply hurt from such false and fabricated statements and plaintiff's son has even expressed his dismay and disbelief over the statements made in the social media. It is also stated that the defendants are also airing an alleged telephonic conversation between two police officers discussing about the acts said to be committed by the plaintiff's husband and it is nothing but pure media trial which cannot be done for the purpose of tarnishing the image and reputation of the plaintiff and her family. It is also stated that the applications and news has affected the right of free fair and investigation of the trial and therefore an order of ex parte temporary injunction is required to prevent the defendants from printing, telecasting and publishing the defamatory statements against the plaintiff and her family.

3. Heard the learned Senior Counsel Sri Prabhuling NaVādagi appearing on behalf of the plaintiff.

4. The point for determination of the Court is-

"Whether the plaintiff has made out grounds to grant an ex parte temporary injunction order?"

5. The finding of this Court on the above point is in the affirmative for the following:-

117

185 167

REASONS:-

6. As per the materials available on record, the Karnakshipalya Police have registered a case against the husband of the plaintiff and others for the offence of murder and other connected offences. The husband of the plaintiff happens to be a film actor. The materials produced by the plaintiff at this stage prima-facie reflects that the publications and telecasts made so far by the defendants not only with regard to the details of the investigation conducted by the Police but also the family relationship of the plaintiff with her husband.

7. The specific contention of the plaintiff is that the defendants are fabricating false and defamatory statements that the plaintiff and her husband are heading towards marital separation and they do not share any healthy relationship as husband and wife. It is further contended that such uncorroborated and false statements have deeply impacted the family bonding of the plaintiff with her husband and also their son. There is prima-facie materials to that effect.

8. Needless to mention that family relationship of the plaintiff and her husband are personal matters of the plaintiff and her husband and therefore the defendants cannot debate on that and make defamatory statements. In the decision of our Hon'ble High Court rendered in case of A.K. Subbaiah v/s. N. Garudachar

~~136~~ 168

10

ILR 1987 Page 100 Karnataka, our Hon'ble High Court has held that the reputation is most valuable to any person and it is much more valuable than any amount of money or anything else in the world. The Hon'ble High Court has further held that merely because the law recognizes the truth or justification as a defence, it does not give the media the right to speak anything that likes. In the judgment of the Hon'ble Supreme Court rendered in the case of Omprakash Chautala v/s Kanwar Bhan and others (2014) 5 SCC 417 the Hon'ble Supreme Court has held that when reputation is hurt, a man is half-dead. Therefore the defendants are required to consider the right of reputation of the plaintiff and her family while telecasting or publishing the news in connection to the offences in which her husband said to be involved.

9. Learned Senior Counsel has also brought to the notice of the Court the Circular issued by the Govt. of Karnataka in No.HD-59/SST/2021 dated 11.08.2021 pursuant to the direction of Hon'ble High Court passed in a Public Interest Litigation in WP No.7026/2021/PIL wherein the Hon'ble High Court has made it clear that before completion of the investigation the Police Officers shall not divulge the nature of the investigation and prohibited from disclosing the identity of the complainant and accused. The Govt. has specifically directed that no police officers shall brief and disclose to the print and electronic or social media about the nature

119

251

~~167~~ 169

of the investigation under progress and also the materials collected during the investigation except disseminating the information relating to the registration of the FIR. It is contended that inspite of this, the defendants are illegally publishing incorrect information which is nothing but media trial affecting free and fair investigation. At this stage, there is sufficient force on the submission made by the learned Senior Counsel. No doubt the criminals can be exposed and offences cannot be viewed lightly, but in the guise of exposing the offences, the personal life, liberty and reputation of a person cannot be marred. It shall be noted that the investigation has not been completed and therefore it is too premature to the defendants to express any opinion about the guilt or otherwise of the husband of the plaintiff. It is well settled law that the doubts how so ever high it will not substitute the proof. Hence it is too premature to the defendants to express any opinion about the guilt or otherwise of her husband in the alleged crime. It is highly improper to publish or telecast the information and news as if he has committed the guilt. Having regard to these aspects, an order of ex parte temporary injunction is very much necessary. If notice is issued it takes time and in the interregnum period there will be further publications and telecasting of the news which would damage the reputation of the plaintiff and her husband. Therefore if notice is issued, the very object of granting an order of ex parte

~~188~~ 170

120

temporary injunction would be defeated by delay. Hence, the above point is answered in the affirmative and the following order is passed:-

ORDER

The defendants, their reporters, anchors or any other persons claiming on behalf of them are restrained from printing, publishing, telecasting the news or any other information touching the personal and family life of the plaintiff, her husband Darshan Srinivas or publishing or telecasting any unauthenticated information/opinion in connection with the investigation in Crime No.250/2024 conducted by Kamakshipalya Police Station.

(Dictated to the Senior Sheristedar through Dictaphone recorded by me, transcribed by him on Computer, carried out corrections, taken print out and then then pronounced in the Open Court on this the 19th day of June, 2024).

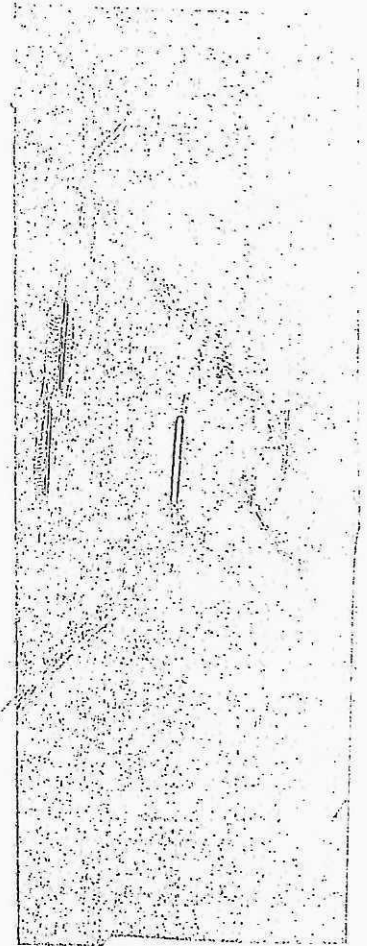
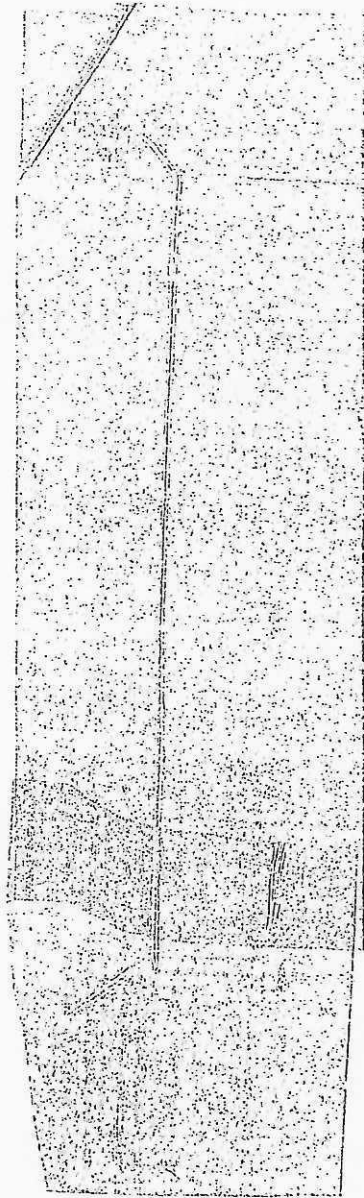
(Vijaya Kumar Rai)
X Addl. City Civil & Sessions Judge
Bengaluru.

Annexure - 'B'

~~#89~~

191

121



KARNATAKA STATE POLICE

ANNEXURE - C

#90 (172)

(122)

FIRST INFORMATION REPORT
(Under Section 154 Cr.PC)

Before the Honourable Court of 24th Addl. CMM Court, Nrupatunga Road,
Bangalore City

1. Police Station : Bengaluru City Circle/Sub Division : Vijayanagar Sub-Divis PS : Kamakshipur
Crime No : 0250/2024 FIR Date : 09/06/2024

2. Act & Section : IPC 1960 (U/s-302,201)

3. (a) Occurrence of Offence Day : Sunday From Date : 09/06/2024 To Date : 09/06/2024
From Time : 08:00:00 To Time : 08:30:00
(b) Information received at the PS : 09/06/2024 09:10:00 Written/Oral : Written

(c) Persons for Delay in reporting by the Complainant / Informant

(d) General Diary reference Entry No. & Time : 1 , 09:10:00

4. (a) Place of occurrence with full address

Beside Rajakaluve, Near Salva Anugraha Apartment, Summanahalli, Bengaluru
City, Karnataka, 560079

(b) Distance from PS : Towards West 2 KMs from PS

(c) Village : SALARPURI Beat Name : 3rd BEAT
A SATTVA
APPARTME
NT
JUNCTION

(d) If the place belongs to another jurisdiction, PS. Name :

District :

5. Complainant/Informant:

(a) Name : Keval Ram Dorji Father's/Husband's Name : Jayabahaddur Dorji



173

(b) Age : 27 (c) Occupation : Employed in private firms
(d) Religion : (e) Caste :
(f) Fax : (g) Email :

(h) Phone No. : 9148064220 (i) Nationality : India
(j) Passport No. : Date of Issue :

(k) Address : Security Officer In (l) Sex: Male
Salva Anugraha
Apartment,
Summanhalli
Bengaluru, Reside
nt at House No.
nill, Near Indian
Petrol Bunk, Ulial,
Bengaluru City,
Karnataka

(m) Whether complainant has seen the occurrence or merely heard of it :

(n) Known/suspected/unknown accused with full particulars (Attach separate sheet if necessary)

S.No.	Name / Father Name / Caste / Address	Type	Person Type	Sex	Age	Occupation
		Unknown				

7. Details of Victims with full particulars

S.No.	Name	Address	Injury Type	Sex	Age	Occupation
	Unknown	Bengaluru City Karnataka	Fatal	Male	35 years	

8. Particulars of Property stolen/involved with value (Attach separate sheet if necessary)

S.No.	Property Type	Item description	Estimated Value (In Rs.)

Total Value of the property Stolen / Involved :

9. Criminal Report/U.D. Case No. if any :

26

(4 F)

~~193~~ (175)

Name: GIRISH NAIK C - Pi

Copy to: Superintendent of Police/Commissioner of Police

FFI

#9#

176

ANNEXURE

D
127

ಪ್ರಥಮ ಪತ್ರಮಾನ ವರದಿ

(ಭಾರತೀಯ ನಾಗರಿಕ ಸುರಕ್ಷಣಾ ಸಂಹಿತೆ 173 ರ ಅಡಿಯಲ್ಲಿ)

ಇಲ್ಲಿನ ನ್ಯಾಯಾಲಯ : 45th ACJM Court, Bengaluru City

ಸ್ಥಳ : Bengaluru City
ಘಟನಾ ಸಂಖ್ಯೆ : 0000/2025

ವ್ಯಕ್ತಿ/ಉಪ ವ್ಯಕ್ತಿ : Bengaluru City
ಪ್ರ.ವ.ವ.ದಿನಾಂಕ : 24/12/2025

ಪೊಲೀಸ್ ಠಾಣೆ : Cyber Crime
Police Station

ಸಂಬಂಧಿಸಿದ ಕಾನೂನುಗಳು : INFORMATION TECHNOLOGY ACT 2000 (U/a-67,68(C)); THE BHARATIYA NYAYA SANKHITA
(U/a-351(3),352,75(3),351(2),79,80 2(5))

(a) ದಿನಾಂಕ : Sunday ದಿನಾಂಕ ದಿನ : 24/12/2025 ದಿನಾಂಕ ವರದಿ : 24/12/2025
ವೇಳೆಯುಂಟು : 10:10:00 ವೇಳೆಯವರದಿ : 10:30:00

(b) ಉಪಸ್ಥಿತಿಯಲ್ಲಿ ಪತ್ರಮಾನ ಸಿದ್ಧಪಡಿಸಿದ ದಿನಾಂಕ : 24/12/2025 15:00:00 ಬರವಣಿಗೆಯಲ್ಲಿ / ಪೇಪರ್ : Written

(c) ಪರಿಶೀಲಿಸಿದವರ / ಬಾಹ್ಯದವರ ತಡವಾಗಿ ವರದಿ ಮಾಡಿದಾಗ ಉಪಸ್ಥಿತರು :

(d) ಉಪಸ್ಥಿತರ ದೃಶ್ಯ ಉಪಸ್ಥಿತಿಯ ಸಂಖ್ಯೆ ಮತ್ತು ಸಮಯ : 1 , 15:00:00

(e) ಸ್ಥಳೀಯ ವರದಿ ಸಂಖ್ಯೆ :

Online, Bengaluru City, Karnataka,

(f) ಪೊಲೀಸ್ ಠಾಣೆ ಉಂಟಾದ ಇರುವ ದಿಕ್ಕು ಮತ್ತು ದೂರ : 13 KM

(g) ಸ್ಥಳೀಯ : Bengaluru city ಸ್ವಾಭಾವಿಕ : General

(h) ಸ್ಥಳೀಯ ವೇದ ಪೊಲೀಸ್ ಠಾಣೆ ವ್ಯಾಪ್ತಿಗೆ ಬರುವಂತಹದ್ದು ಅದರ ಆ ಪೊಲೀಸ್ ಠಾಣೆಯ ಹೆಸರು :

ಹೆಸರು :

(i) ಪರಿಶೀಲಿಸಿದವರ/ಬಾಹ್ಯದವರ :

(a) ಹೆಸರು : Vijayalakshmi ತಂದೆ / ಗಂಡನ ಹೆಸರು :

(b) ವಯಸ್ಸು : 40 (c) ವೃತ್ತಿ :

(d) ಧರ್ಮ : (e) ಖಾತೆ :

(f) ಇ-ಮೇಲ್ : chbdch@gmail.com

(g) ದೂರವಾಣಿ : 9448383661 (h) ರಾಷ್ಟ್ರೀಯತೆ : India

(i) ಉಪ್ಪು ಪೊಲೀಸ್ ಸಂಖ್ಯೆ : ನೀಡಿದ ದಿನಾಂಕ :



145

177

(k) ವಿಳಾಸ : No.145 Tower 4
 Prestige south
 Ridge apartment
 100 feet ring road
 Hosakerihalli,
 Bengaluru City,
 Karnataka-560085

(l) ಲಿಂಗ : Female

(m) ವಿಚಾರಣೆಗಾಗಿ ಮೊದಲಿನಿಂದಲೂ ಅಧಿಕಾರಿಗಳಿಗೆ ತಿಳಿದಿರುವುದಿಲ್ಲ

9. ಅಪರಾಧ / ಅನುಮಾನಿತ/ಅಪರಾಧಿತ ವ್ಯಕ್ತಿಯ ಪೂರ್ವ ವಿವರಗಳು

Sl.No.	ನಾಮ / ಕಂದಾಯ ನೆಲೆ / ಒಡೆತನ / ವಿಳಾಸ	ವಿಧ	ವ್ಯಕ್ತಿಯ ವಿಧ	ಲಿಂಗ	ವಯಸ್ಸು	ಇತರೆ
1	Unknown 18 Socila media account holders and others(A1) HABengaluru City, Karnataka	Accused	Common man	Male		

10. ಅಪರಾಧಿ ವಿವರಗಳು

Sl.No.	ನಾಮ	ವಿಳಾಸ	ರೂಪದ ವಿಧ	ಲಿಂಗ	ವಯಸ್ಸು	ಇತರೆ
1	Vijayalakshmi	No.145 Tower 4 Prestige south Ridge apartment 100 , hosakerihalli Bengaluru City Karnataka		Female		

11. ಅಪರಾಧ / ಬಾಧ್ಯತೆಗಾಗಿರುವ ಸ್ವತ್ತುಗಳ ವಿವರಗಳು

Sl.No	Property Type	Item description	Estimated Value (Rs. Lakhs)
1			

12. ಅಪರಾಧ / ಬಾಧ್ಯತೆಗಾಗಿರುವ ಸ್ವತ್ತುಗಳ ವಿವರಗಳು

13. ಅಪರಾಧಿ ಕುರಿತು / ಯು.ಡಿ. ಡಿ.ಎಸ್. ಸಂಖ್ಯೆ

14. ಅಪರಾಧ / ಅನುಮಾನಿತ/ಅಪರಾಧಿತ ವ್ಯಕ್ತಿಯ ವಿವರಗಳು

#46 (178)

(120)

Controlling (Instagram):

LINK: <https://www.instagram.com/reel/OSjivQxkBcV/?igsh=MWQ1eDM1djQyMTlvdg==>

by: Akshay @KingKiccha

LINK: <https://x.com//status/2002979820590989451>

by: GooLI@K_Cull @K_Cull_

LINK: <https://x.com//status/2002792836866170937>

by: Jeeva Kiccha @KicchakIngma...

LINK: <https://x.com//status/2002952073424593228>

by: @Iroll_nim_appa_)

LINK: https://www.instagram.com/Iroll_nim_appa?igsh=cHhxZGxoazZicW53

by: karonadu_kiccha)

LINK: https://www.instagram.com/karonadu_kiccha?igsh=cDdmMnN1Y2hoY3FQ

by: shivya sharmaa (Instagram)

by: kiccha_45_rolnar (Instagram)

by: kic_12 (Instagram)

by: mark_boss45 (instagram)

by: Gowda 0722 Rohilh (Instagram) ಹಾಗೂ ಇತರರು.

ಈ ವಿಷಯವನ್ನು ಕುರಿತು ಕೆಲವು ಸಮೀಕ್ಷೆಗಳನ್ನು ನಡೆಸಲು ಮತ್ತು ಕೆಲವು ಭಾ.ಸ.ಆ. ರಿಪೋರ್ಟ್‌ಗಳನ್ನು ಸಿದ್ಧಪಡಿಸಲು ನಿರೀಕ್ಷಿಸಲಾಗಿದೆ.

1. ಈ ವಿಷಯವನ್ನು ಕುರಿತು:

investigation

(ii) ಈ ವಿಷಯವನ್ನು ವಿಚಾರಿಸುವುದರಿಂದ ಆತನಿಗೆ ಭಾ.ಸ.ಆ. ರಿಪೋರ್ಟ್ ಸಿದ್ಧಪಡಿಸಲು ಸಾಧ್ಯವಾಗಿದೆಯೇ ಎಂದು ತಿಳಿಯುವುದು.

ಇದಕ್ಕೆ ಉತ್ತರಿಸುವುದು: Yes

ಈ ವಿಷಯವನ್ನು ವಿಚಾರಿಸುವುದರಿಂದ ಈ ವಿಷಯವನ್ನು ವಿಚಾರಿಸುವುದು ಮತ್ತು ಈ ವಿಷಯವನ್ನು ವಿಚಾರಿಸುವುದು.

17/12/2025 ರಂದು (ಬಿ) 178 ಭಾರತೀಯ ನಾಗರಿಕ ಸುರಕ್ಷಣೆ ಸಂಹಿತೆ (ಬಿಎನ್‌ಎಸ್‌ಎಸ್) ಅಡಿಯಲ್ಲಿ ಈ ವಿಷಯವನ್ನು ವಿಚಾರಿಸುವುದು.

ಈ ವಿಷಯವನ್ನು ವಿಚಾರಿಸುವುದು.

13. ಈ ವಿಷಯವನ್ನು ಕುರಿತು ವಿಚಾರಿಸುವುದು.

[Handwritten Signature]

13. ಈ ವಿಷಯವನ್ನು ಕುರಿತು ವಿಚಾರಿಸುವುದು ಮತ್ತು ಸಮಯ : 24/12/2025 15:30:00

#98 (186)

(136)

ಮಾಲ್ಯಾಟಿ, ತೆರಿವುಕೊಂಡು ಹೋದ ಓಟ/ ಹೆಜ್ಜೆ : MARUTI , PC 17678

ಮಾಲ್ಯಾಟಿ ತೆರಿವುಕೊಂಡು ಹೋದ

ಮಾಲ್ಯಾಟಿ ತೆರಿವುಕೊಂಡು ಹೋದ

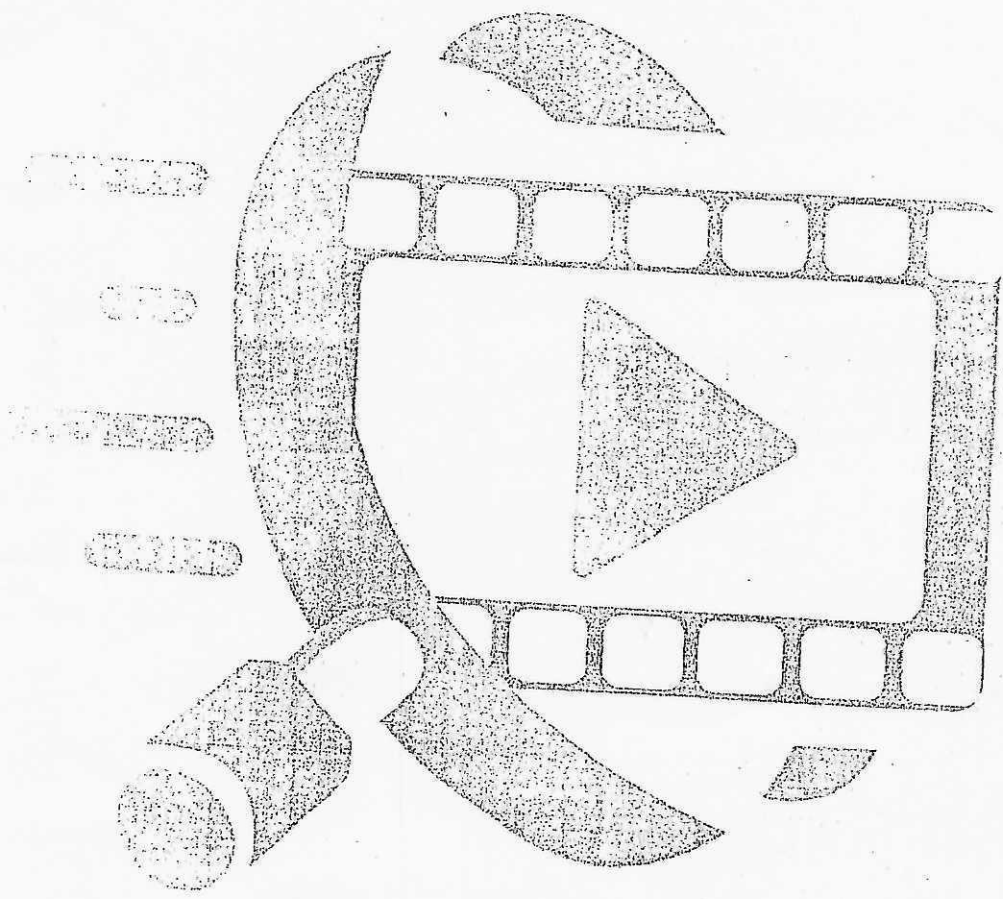
ಹೆಸರು: Pn...kumar S M - P
ಪೂಜಾರಿ ಇನ್ಸ್‌ಪೆಕ್ಟರ್
ಶೈಬರ್ ಶ್ರೀಂ ಪೂಜಾರಿ
ಬೆಂಗಳೂರು ನಗರ

Superintendent of Police/Commissioner of Police

केन्द्रीय चलचित्र प्रमाणन बोर्ड
CENTRAL BOARD OF FILM CERTIFICATION

e-cinpramaan

[Click here to apply](#)



Search

Movie Search Results

Movie Name

[Back to search Page](#)

Certified length

122.14 Mts

Name of Producer

TANUSH S - BANGALORE URBAN(SIRI PRODUCTIONS)

Name of Applicant

Tanush S- BANGALORE URBAN(SIRI PRODUCTIONS)

Plot Summary

The films protagonist, a famous cricket player, has made a name for himself in the cricket world. One day a man repeatedly sends obscene messages and calls to his girlfriend. Angered by this Jeevan who works at her house and his friends find the man and beat him up mercilessly. The incident then takes many turns and revolves around the protagonist.

Cats and Credit details

Editor : S MAHESH REDDY
 Director of Photography : SHARATH, ANEESH, NAVEEN
 Music : DYAVI SURESH
 Dialogues : V LAVA
 Screenplay : V LAVA
 Story : V LAVA
 Producer : TANUSH
 Supporting Actors : SANDEEP NINASAM, VEERAN KESHAV, VIJLESH
 Main Actors : TANUSH, PAYAL CHANGAPPA, MOHIKA GOWDA
 Director : V LAVA

~~201~~ (183)

(137)

IN THE COURT OF THE HON'BLE PRINCIPAL CITY CIVIL AND
SESSIONS JUDGE, BANGALORE

I.A No. _____ /2026

IN

O.S. No. _____ /2026

BETWEEN:

SRI. DARSHAN SRINIVAS & Anr.

.... PLAINTIFFS

AND:

SIRI PRODUCTIONS & Ors

..... DEFENDANTS

APPLICATION UNDER ORDER VI RULE 14(a)
OF CODE OF CIVIL PROCEDURE, 1908

The undersigned counsel for the Plaintiffs humbly submits that,
the addresses of the Plaintiffs and the Defendants shown in the
cause title above are the registered address of the parties.

Place: Bengaluru

Date: 25.03.2026

Advocate for Plaintiffs

184

188

IN THE COURT OF THE HON'BLE PRINCIPAL CITY CIVIL AND
SESSIONS JUDGE, BANGALORE

I.A No. _____ /2026

IN

O.S. No. _____ /2026

BETWEEN:

MR. DARSHAN SRINIVAS & Anr.

.... PLAINTIFFS

AND:

SRI PRODUCTIONS & Ors

..... DEFENDANTS

INTERLOCUTORY APPLICATION FILED BY THE PLAINTIFFS
UNDER ORDER XXXIX RULE 1 & 2 READ WITH SECTION 94(B)
AND SECTION 151 OF THE CODE OF CIVIL PROCEDURE, 1908

That for the reasons sworn in the accompanying affidavit, the plaintiffs herein most respectfully prays before this Hon'ble Court to grant an order of Ex-parte ad-interim temporary injunction directing the Defendant No.1 and Defendant No.2, its producers, directors, the, their representatives, associates, servants, agents, employees, men or anyone claiming through or under them, from in any manner producing, filming, editing, promoting, marketing, releasing, distributing, exhibiting, telecasting, streaming, selling, licensing, leasing, or dealing with the movie titled "BOSS" (or any other movie / film / web-series / content by whatever name called) based on or depicts the life of the Plaintiffs, the incidents alleged in the criminal case pending in C.C. No.1319 of 2024 before the LVI Addl. City Civil and Sessions Judge, Bengaluru, or any elements directly or indirectly referring to or associating with the Plaintiffs' private life, family, reputation, the sub-judice criminal proceedings or any other similar incidents, and from using the Plaintiffs' name, image, likeness, personality rights, or any promotional material (posters, teasers, trailers, press meets, interviews, etc.) in any medium including Theatres and/or Intermediary Streaming Platforms (OTT) whatsoever by appointing a receiver for enforcement of the present order in the interest of Justice and Equity

Place: Bengaluru

Date: 25.03.2026

Advocate for Plaintiffs

203 (185)

39

IN THE COURT OF THE HON'BLE PRINCIPAL CITY CIVIL AND
SESSIONS JUDGE, BANGALORE

I.A No. /2026

IN

O.S. No. /2026

BETWEEN:

SRI. DARSHAN SRINIVAS & Anr.

.... PLAINTIFFS

AND:

SIRI PRODUCTIONS & Ors

..... DEFENDANTS

AFFIDAVIT

I, Smt. Vijayalakshmi Darsha, aged 43 years, W/o Sri Darshan Srinivas residing at #217, Thoogu Deepa Nilaya, F-Road, Ideal Home Township, Rajarajeshwari Nagar, Bangalore South, Bengaluru, Karnataka - 560098, do hereby solemnly affirm and state on oath as follows,

1. I state that, I am the Plaintiff No.2 in the above case. I am well conversant with the facts of the case and I am competent to swear to the contents of this Affidavit for and on behalf of Plaintiffs.
2. I have filed the accompanying application seeking grant an order of Ex-parte ad-interim temporary injunction directing the Defendant No.1 and Defendant No.2, its producers, directors, the Director Lava V, their representatives, associates, servants, agents, employees, men or anyone claiming through or under them, from in any manner producing, filming, editing, promoting, marketing, releasing, distributing, exhibiting, telecasting, streaming, selling, licensing, leasing, or dealing with the movie titled "BOSS" (or any other movie / film / web-series / content by whatever name called) based on or depicts the life of the Plaintiffs, the incidents alleged in the criminal case pending in C.C. No.1319 of 2024 before the LVI Addl. City Civil and Sessions Judge, Bengaluru, or any elements directly or indirectly referring to or associating with the Plaintiffs' private life, family, reputation, the sub-judice criminal proceedings or any other similar incidents, and

Vijayalakshmi Darshan

~~201~~ (186)

(140)

- from using the Plaintiffs' name, image, likeness, personality rights, or any promotional material (posters, teasers, trailers, press meets, interviews, etc.) in any medium whatsoever by appointing a receiver for enforcement of the present order.
3. That the contents of the main petition may be read in conjunction with this application for brevity of facts and circumstances.
 4. That the Defendant No.1 banner has produced a movie titled "BOSS" by Thanush Shivanna, Directed by Defendant No.2 Lava V with Thanush Shivanna playing lead role. That the teaser of the movie released on 09.03.2026 refers to killing of a person, the audio of a person requesting not to kill him as he has a pregnant wife at home and aged parents, the body being found next to a drainage pipeline, arrest of a celebrity, investigation regarding the killings, the movie having two female leads, and the fans of the lead actor in the movie referring to him as "boss", the incident in the movie occurring in Bengaluru, etc., all of which are similar to the crime that the Plaintiff No.1 is currently under trial for before the before the LVI Addl. City Civil and Sessions Judge, Bengaluru in C.C No.1319 of 2024.
 5. It is submitted that Plaintiff No.1 is a movie actor, producer and is known for playing as lead in numerous successful Kannada movies and Plaintiff No.2 is the wife of Plaintiff No.1. That the Plaintiff No.1 has established his own identity, fame and name in the society, through his dedication and hard work and is recognized as one of the prominent members of the South Indian Cinema Industry.
 6. It is submitted that as stated supra the Plaintiff No.1 is currently undergoing Trial in S.C No.1319 of 2024 pending before the LVI Additional City Civil and Sessions Judge, Bengaluru. It is pertinent to note that due to the fact that the Plaintiff No.1 is a celebrity with huge fan following numerous attempts have been made by media channels, third parties and other people within and outside the

Vijayalaxmi Dahanu

~~205~~ (187)

(141)

industry trying to sensationalize the allegations and the Case filed against the Plaintiff No.1 to further their own careers.

7. Similarly, the Defendant No.1 & 2 have with the intention of using the popularity that the Plaintiff No.1 and the curiosity that the public has regarding the case filed against the Plaintiff No.1 and has made movie title "Boss".
8. It is submitted that Defendant No.1 and Defendant No.2 have edited the teaser in such a manner that it has created a buzz among public and journalists that the movie is similar to the Plaintiffs life and the aforementioned criminal proceedings, thereby leading to public curiosity and cheap publicity for the movie. On the contrary, the movie, the teaser and other promotional material are in violation of the protection granted by the Hon'ble High Court of Karnataka and Hon'ble District and Session.
9. That the Defendant No.1 and Defendant No.2 has produced the movie without obtaining any prior permission or providing any intimation or information to neither the Plaintiff nor any other party/authorities despite being aware that the case is sub judice. It is pertinent to note that the Defendant No.2 claims to be an advocate and also explicitly states that the he is aware that the case against the Plaintiff is sub judice but conveniently makes a movie based on Plaintiff No.1 by making few minor changes in an attempt to circumvent from legal consequences.
10. That the Defendant No.1 has also ignored the orders of the Hon'ble District and Sessions Judge and High Court of Karnataka which have provided protection to the reputation and Privacy of the Plaintiff and his family members by directing the media and/or any other third party from publishing, telecasting, distributing any unverified news, statements, claims etc., which may tarnish the image of the Plaintiff. The copies of the orders have been produced as Document No.5 along with the main petition.

Vijayalaxmi Dahan

11. It is submitted that the Defendant No.1 and Defendant No.2 have denied the allegation of the similarity with the Plaintiffs life or the incidents in their life but it is pertinent to note that the title "boss" is one of the movie in which the Plaintiff No.1 has acted in lead role, the teaser showing the death of a fan, the protagonist in the movie being referred to as "boss" which is similar to how the Plaintiff No.1 is referred to by his fans as "D-Boss", the protagonist in the movie being involved in killing of his fan, all of which are not co incidences or inspired by any other events as claimed by the Defendant No.1 and 2. It is submitted that these similarities prima facie show that that the said movie is based on the Plaintiffs life and the pending criminal proceedings which is clearly in violation of their Right to privacy.
12. It is submitted that the Plaintiffs through their advocates had gotten a statutory notice issued to Shri. Yashwant Shehnai, the Regional officer of the Defendant No.3 under Section 5B of the Cinematograph Act read with Cinematograph Rules seeking to forthwith cease examination/refusal of certification. Despite issuance of the said statutory notice, the Defendant No.3 authority has provide the Defendant No.1 the certificate which would enable them to exhibit the movie in public by screening it in theatres, releasing it on televisions or distribute them in physical form in CDs or DVDs.
13. It is pertinent to note that the following summary has been provided by the Defendant No.1 and Defendant No.2 for certification to the Defendant No.3 authority, for certification which is reproduced for ease of reference of this Hon'ble Court,

Plot Summary

"The films protagonist, a famous cricket player, has made a name for himself in the cricket world. One day a man repeatedly sends obscene messages and calls to his girlfriend. Angered by this Jeevan who works at her house and his friends find the man and beat him up mercilessly.

Vijaya Dahanu

~~207~~ (189)

(142)

The incident then takes many turns and revolves around the protagonist."

14. It is submitted that from the above plot summary it can be clearly seen that the except for the protagonist being a "famous cricket player" the entire story line reminds similar to the crime that has been alleged against the Plaintiff No.1. The Defendant No.1 and Defendant No.2 have been blatantly lying before the media, public and any person who has raised questions regarding the movie in order to circumvent the protection to the reputation and privacy granted to the Plaintiffs and their family members.
15. That it is well settled principal of law that a good reputation is an element of personal security and is in turn protected by Constitution. That the reputation is a part of fundamental rights and personal liberty as guaranteed under Article 21 of the Constitution. Every person has the right to defend his reputation being tarnished. The Plaintiff and his family have been struggling both mentally and emotionally due to the conduct of the Defendant No.1 and Defendant No.3 to 7 have been telecasting the promotional material of the movie continuously violating the fundamental right of a citizen of the Plaintiffs and their family members.
16. It is submitted that the movie "boss" has already received certification from the Defendant No.3 authority and in the event the movie "BOSS" is permitted to be exhibited in cinema halls, multiplexes or theatres or on any of the OTT or any other platform, it would cause immediate, widespread and irreparable harm to the Plaintiffs' reputation, privacy and right to fair trial.
17. If the present application is not allowed and notice to the defendants is ordered at the first instance, the granting of injunction would be defeated by delay which would provide the Defendant No.1 to release the movie and make the present suit infructuous, and it would result in miscarriage of justice.

Vijaya Dahan

~~208~~

(190)

(LW)

18. The Plaintiffs have a good case on merits and fair chances of success. The Plaintiffs have made out a prima facie case for grant of an ex-parte order of temporary injunction against the Defendants. The balance of convenience lies in Plaintiffs favor.

19. No harm or injustice would be caused to the Defendants, If an ex-parte order of temporary injunction is granted in my favor.

Wherefore this Hon'ble Court may be please to grant an Ex-parte ad-interim temporary injunction directing the Defendant No.1 and Defendant No.2, its producers, directors, their representatives, associates, servants, agents, employees, men or anyone claiming through or under them, from in any manner producing, filming, editing, promoting, marketing, releasing, distributing, exhibiting, telecasting, streaming, selling, licensing, leasing, or dealing with the movie titled "BOSS" (or any other movie / film / web-series / content by whatever name called) based on or depicts the life of the Plaintiffs, the incidents alleged in the criminal case pending in C.C. No.1319 of 2024 before the LVI Addl. City Civil and Sessions Judge, Bengaluru, or any elements directly or indirectly referring to or associating with the Plaintiffs' private life, family, reputation, the sub-judice criminal proceedings or any other similar incidents, and from using the Plaintiffs' name, image, likeness, personality rights, or any promotional material (posters, teasers, trailers, press meets, interviews, etc.) in any medium including in Theatres and/or Intermediary Streaming Platforms (OTT) whatsoever by appointing a receiver for enforcement of the present order in the interest of Justice and Equity

Identified by me

Advocate

Place: Bengaluru

Date: 25.03.2026

Vijaya Dharma
Deponent

(4)

~~109~~ (191)

ANNEXURE - C

IN THE COURT OF HON'BLE ADDITIONAL CITY CIVIL AND SESSIONS
JUDGE AT BENGALURU

O.S. No. 2151/2026

BETWEEN:

SRI. DARSHAN SRINIVAS
AND ANOTHER

PLAINTIFFS

AND:

SIRI PRODUCTIONS
AND OTHERS

DEFENDANTS

WRITTEN STATEMENT OF DEFENDANT No. 1 AND 2 UNDER
ORDER VIII RULE 1 OF CODE OF CIVIL PROCEDURE

The Defendant No. 1 and 2 humbly submits as follows:

1. The present suit is not maintainable either on facts or law as the cause of action is illusory and created for the purpose of present suit. Hence the suit is liable to be dismissed.
2. It is submitted that the Plaintiff No. 1 herein has not signed the Plaint at all. However, in the Plaint cause title there is a recital to the effect that since the Plaintiff No. 1 is in judicial custody the Plaintiff No. 2 being his wife has signed the Plaint on his behalf. This is absolutely false and un-sustainable under law. It is submitted that under law there is no exemption or dispensation to the plaintiff in a suit for not signing the plaint on the ground that he is in judicial custody. The Plaintiff No. 2 has not filed appropriate and relevant application to that effect which is provided under the Code of Civil Procedure. Hence, only on this ground the Plaint is liable to be returned for proper presentation and therefore, these Defendants humbly prays to this Hon'ble Court to treat this non-compliance as a preliminary issue and decide the same in accordance with law.



(5)

~~110~~ (192)

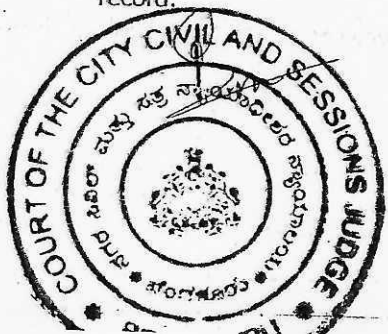
3. The Plaintiffs herein have not paid the Court fee as per the provisions of Karnataka courts Fee and Suit Valuation Act having regard to the nature of reliefs sought in the Plaint. Hence, the plaint is liable to be rejected at the very threshold.
4. The present suit is hopelessly barred by virtue of Section 80 of the Code of Civil Procedure.
5. It is further submitted that the reliefs sought in the Plaint are untenable, misconceived and frivolous and not enforceable under law.
6. It is submitted that the present suit is filed seeking an injunction against release or exhibiting of the Kannada movie "BOSS" which is produced and directed by the Defendant No. 1 and 2 herein is not based on either the life of Plaintiff No. 1 and 2 or the incident which is subject matter of Special Criminal Case No. 1319/2024. Hence the present suit is liable to be dismissed.
7. The averments made at para 3 in the plaint that the Plaintiff No.1 is a movie actor, producer and is known for playing as lead in numerous successful Kannada movies and the Plaintiff No.2 is the wife of Plaintiff No.1 is a matter of record. However, the Plaintiffs are put to strict proof of the same. The further averment that the Plaintiff No.1 has established his own identity, fame and name in the society, through his dedication and hard work and is recognised as one of the prominent members of the South Indian Cinema Industry is many other artist also gained name in South Indian Industry by their handwork.
8. The averments made at para 4 in the plaint that the Plaintiff No.1 has not only been an actor but has contributed to the other crafts and art forms and it is necessary to understand the hard work that the Plaintiff No.1 has put to reach the position he currently holds, he has worked as a projectionist, raising to the ranks as assistant cameraman, playing minor roles in Television, working as dubbing artist for animations, working in advertising etc., as a consequence of his hard work and challenges faced by him during his journey in the movie industry and the Plaintiff No.2 has attained his spycdom and has often been referred to as to as 'Challenging Star Darshan', Boss & 'D Boss' etc., by his fans and admirers and it is pertinent to note that the aforementioned names have



(6) 211 (193)

been used synonymously with the Plaintiff No.1 name are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

9. The averments made at para 5 that during October-November 2025, it had come to the knowledge of the Plaintiffs through her family and well-wishers that a movie was being produced by the Defendant No.1 represented by producer, Tanush S, who is also the lead actor is partly true in so far as making of the movie in question. The further averments that the said movie is based on the life of the Plaintiffs including the allegations of crime for which Plaintiff No.1 is currently undergoing trial and is in judicial custody and as there was no substantial material to show that such movie was being produced, the Plaintiffs ignored the news as rumours are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.
10. The averments made at para 6 that subsequently, the promotional materials such as the posters, advertisements on television news and articles of a movie, teaser produced by the Defendant No.1 were releasing one after another and these promotional material have been fuelling public speculation that the movie was based on the crime that the Plaintiff No.1 is currently under trial for and that the movie is based on the Plaintiff No.1 himself are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same. However, the Defendant No. 1 and 2 hereby clarify that it is true that promotional materials such as the posters, advertisements on television news and articles of a movie, teaser produced by the Defendant No.1 were releasing in respect of his movie which has nothing to do with the Plaintiffs herein in any manner.
11. The averments made at para 7 that the Plaintiffs aggrieved by the said movie currently under production titled "Boss" produced by the Defendant No.1 banner by Tanush S, directed by Defendant No. 2 Lava V with Tanush S playing lead has approached this Hon'ble Court through the present suit is a matter of record.



Tanush

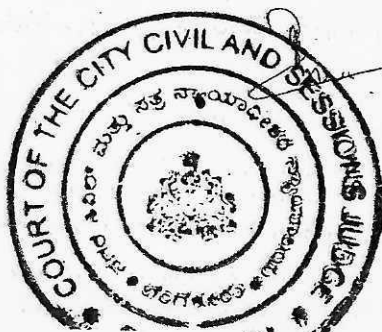
(7)

9/9
19/10

12. The averments made at para 8 that on 09.03.2026 the Defendant No.1 released the teaser of the movie and after the release of the teaser, the Defendant No.2 Director and Defendant No.1 Tanush S, main lead and producer of the movie conducted a press meet with various Journalists is on 9th March 2026. The further averments that both the teaser and the press conference have been uploaded on various channels on Facebook, Instagram, Twitter and YouTube 1.e., Defendant No.4 to 6 is 4. KFCC, 5 Meta Platform (Facebook and Instagram), 6. X-Corp is unknown person twitter account. The document No's 2 and 3 produced by the Plaintiffs are all created for the purpose of present case.

13. The averments made at para 9 that the audio and visuals of teaser of the movie are portrayed in such a manner that any normal viewer would associate the teaser to the life of the Plaintiffs and criminal case filed against the Plaintiff No.1 are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

14. The averments made at para 10 that on plain viewing of the teaser of the said movie it can be seen that the premise of the movie is referring to killing of a person, the audio of a person requesting not to kill him as he has a pregnant wife at home and aged parents, the body being found next to a drainage pipeline, arrest of a celebrity, investigation regarding the killings, the movie having two female leads, and the fans of the lead actor in the movie referring to him as "boss", the incident in the movie occurring in Bengaluru, etc., all of which are similar to the incidents that have occurred as per the allegations made against the Plaintiffs and in the alleged charge sheet which is now pending before the Hon'ble Sessions Court Bangalore and the movie portraying all these incidents and showing them in the very first promotional video itself is not mere coincidence but a strategic plan to make money using the Plaintiffs' private life and reputation as a public personality are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same. It is relevant to state that the lead role performed in the movie in question is a sportsman/athlete i.e., a cricketer and not a celebrity and there is a huge difference between an athlete and celebrity. Therefore, on this ground alone it can be safely considered that the movie in



19/10

(8)

~~2/13~~ (199)

question is not at all similar to the incidents that have occurred which is subject matter in S.C No.1319 of 2024 pending on the file this Hon'ble Court.

15. The averments made at para 11 that it is also pertinent to note that the very first frame of the teaser clearly shows that the movie is inspired by true events and proceeds as stated supra to show lead actor being referred to as "boss" are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.
16. The averments made at para 12 that the Plaintiffs No.1 has himself the lead actor in the movie titled "Boss" released in the year 2011 is a matter of record. The further averments that the same name has been used for the present movie sought for injunction is also a matter of record. The further averments that the movie devolves around the plots and narration of the alleged incidents in the alleged charge sheet and the movie has been used for public exploitation of a private life of a celebrity who is well known across the geographies are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.
17. The averments made at para 13 that the criminal case against the Plaintiffs No.1 regarding the incidents referenced in the Teaser and the movie is currently pending before the LVI Additional City Civil and Sessions Judge, Bengaluru in S.C No.1319 of 2024 and despite being aware of that the case is sub judice, the respondent No.1 along with the Defendant No.2 have been producing a movie based on Plaintiffs' life and the alleged murder without obtaining any prior permission or providing any intimation or information to neither the Plaintiffs nor any other party authorities are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.
18. The averments made at para 14 that aside from the publicly available news and information regarding the criminal case filed against the Plaintiff, there are a lot of misinformation, rumours and statements that are being made to tarnish the image of the Plaintiffs and his family members, in all likelihood, a-movie based on these sources would not only impact the on-going trial before the Hon'ble Sessions Court S.C No.1319 of 2024/but will impact the image and reputation of the Plaintiffs and his family members are all hereby denied as



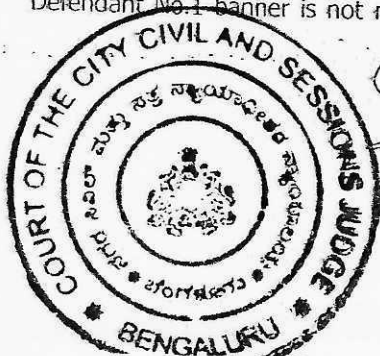
bnv/L

6

~~2/14~~ 198

absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

19. The averments made at para 15 that the Defendant No.2 has been giving interviews on numerous print and electronic media including the channels, website and pages of Defendant No. 8 to 11 are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same. The further averments to the effect that the links with respect to the to the said teaser, press meet, interviews and other articles provided in the para-15 for the reference of this Hon'ble Court are also false and baseless.
20. The further averments in the same para regarding production of copies of the interviews/articles published on print and digital media regarding the movie are all fabricated and concocted for the purpose of present case by the Plaintiffs herein in collusion with the Print and Electronic Media who are all other Defendants herein.
21. The averments made at para 16 that all the articles and videos regarding the movie have made direct comparison to the similarities with the crime alleged against the Plaintiff, the Defendant No.2 i.e., Director of the movie has denied any similarities are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.
22. The averments made at para 17 that, the Karnataka Film Chamber of Commerce i.e., 'Defendant' No. 4, which is the apex body representing producers, directors and exhibitors has failed to enforce its code of conduct despite the actions of Defendant No. 1 violating the established provisions of law by making things regarding the case currently under trial and violation of privacy of one of its own members are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same. The further averments made in the same para to the effect that the Plaintiffs through their Advocates have issued 'a Notice to Defendant No.4 dated 18.03.2026 regarding the movie produced by the Defendant No.1 and the Defendant No.4 in their reply dated 21.03.2026, have stated that the Defendant No.1 banner is not registered with them and the producer of the



[Handwritten signature]
[Handwritten signature]

(16)

215 (197)

movie does not have membership with their organisation are all not known to these Defendants. The Plaintiffs herein are put to strict proof of the same.

23. The averments made at para 18 that it is pertinent to bring to the notice of this Hon'ble Court, the Plaintiffs No.1 in the present case being a prominent personality, has approached the Hon'ble District courts and the Hon'ble High Court of Karnataka seeking to protect the reputation and privacy of himself and his family members, during the course of the Trial in the criminal case and the details of the suits filed by the Plaintiffs listed in the same para are all not known to these Defendants and it is relevant to state that these Defendants are not parties to the said suits. However, the Plaintiffs herein are put to strict proof of the same.

24. The averments made at para 19 that based on the aforementioned suits and Writ 1 petition filed by the Plaintiffs herein, the Hon'ble Courts were pleased to provide protection to the reputation and privacy of the Plaintiffs and his family members, by directing the media and any other third party from publishing, telecasting, distributing any unverified news, statements, claims etc., which may tarnish the image of the Plaintiff are all not known to these Defendants. The Plaintiffs are put to strict proof of the same.

25. The averments made at para 20 that despite taking all the necessary steps to protect the reputation and privacy of the Plaintiffs No.1 and his family, the movie "Boss" being produced by the Defendant No.1 and Directed by Defendant No.2 not only violates the privacy of the Plaintiffs No.1 but also of his wife and other family members and in all likelihood have impact on the ongoing trial before the Sessions Court in S.C No. 1319/2024 are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

26. The averments made at para 21 that under the guise of mere denial that the movie is not related to the Plaintiffs or the alleged crime, the Defendant No.1 and Defendant No.2 have violated the fundamental right to Privacy and personal liberty granted under Article of the Constitution of India and the Defendant No.3 organisation has enabled the violation by providing certification



Taru 12

(11)

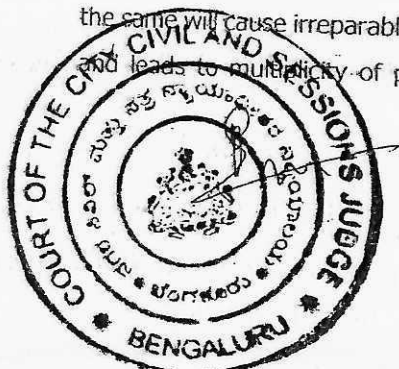
~~216~~ (198)

are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

27. The averments made at para 22 that the Defendant No.1 have been publishing the posters, marketing material on print and other media, teaser, press meets, interviews to print and news media and making statements using the Plaintiffs name and fame to garner interest towards the film are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

28. The averments made at para 23 that the Defendant No.2 has deliberately planned and edited the teaser to create a buzz among the public thereby leading to violation of Privacy of Plaintiffs and his family members and as stated supra, the alleged criminal case referred to in the teaser is currently pending before the Hon'ble Sessions court, Bengaluru, making films, documentaries or any media for wider public consumption would greatly impacts the public perception regarding the trial, the reputation of the Plaintiffs and consequently, the trial pending before the Sessions Court are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

29. The averments made at para 24 that it is an established principle of law that "A good reputation is an element of personal security and is protected by the Constitution equally with the right to the enjoyment of life, liberty and property", hence the Fundamental Rights of the Plaintiffs required to be protected and it is further submitted that every person has a right to defend his reputation from being tarnished are all matter of record. However, in the present case no such violation of fundamental rights of the Plaintiffs which are guaranteed under the Constitution of India are violated by virtue of the alleged acts of the defendant No. 1 and 2 herein. The further averments that the Plaintiffs have already being continuously targeted by the trolls, media and people trying to use the current situation, to enrich themselves and gain limelight and in the current situation if the aforementioned movie is released, the same will cause irreparable damage to his privacy, his reputation, his image and leads to multiplicity of proceedings are all hereby denied as absolutely



Jan 12

(12)

~~917~~

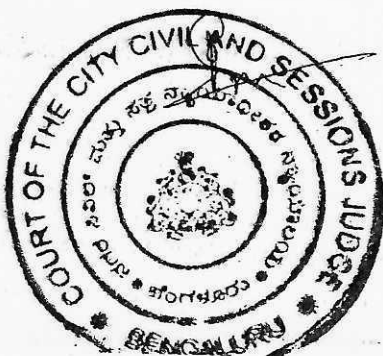
(199)

false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

30. The averments made at para 25 that as a public personality and an actor, reputation and public perception are two of the most important factors that constitute the Plaintiffs No.1's professional standing and livelihood. In film industry, an individual's career is inextricably linked to their brand value and goodwill they have in Public Reputation for any individual is built over years of professional career but is fragile and once reputation is damaged due to misinformation, incomplete information, the resulting damage is irreversible are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

31. The averments made at para 26 that the unauthorized use of Plaintiff No. 1's personality, stardom to create content and sensationalize their own movie, not only causes personal distress but also results in irreparable damage which cannot be compensated monetarily and the balance of convenience lies in favour of protecting the right to privacy and reputation of the Plaintiffs are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

32. The averments made at para 27 that as per the information made available on "Filmi Beat" handle, the Defendant No.2 has already obtained certification and is scheduled for release on 14.04.2026 is a matter of record. The further averments that the Defendant No. 1 in all likelihood will release the movie in theatre movie and might sell, license or lease the rights of the to any other producer, production company or individual is false. The further averments that hence the Plaintiffs have filed the present petition against unknown defendants impleaded as "Ashok Kumar" who may release, publish, distribute or telecast the movie for or on behalf of the Defendant No.1 are all hereby denied as absolutely false, created, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.



Tonik

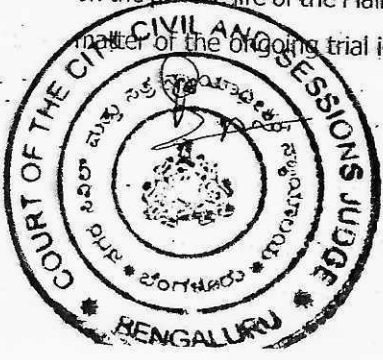
(13) 200 9/18 180

33. The averments made at para 28 that the Plaintiffs have also issued a Statutory Notice under Section 10 of CPC on 13.03.2026 to Shri. Yashwant Shehna, the Regional Officer of the Defendant No.3 under Section 5B of the Cinematograph Act read with Cinematograph Rules seeking to forthwith cease examination/refusal of certification are all not known to these Defendants. However, it is hereby stated that the issuance of notices under Section 10 of CPC only to officer of the Defendant No. 3 is an act of sheer violation of principles of natural justice in so far as these Defendants herein are concerned as they are also the interested persons and non-issuance of such notices to these defendants would make the alleged notice issued under Section 10 of CPC as invalid and untenable.

34. The averments made at para 29 that despite the aforementioned statutory notice, upon verifying the Website of the Defendant No.3 authority it to the attention of the Plaintiffs that the authority it has come to the attention of the plaintiffs that the authority has illegally and arbitrarily granted certificate to the movie of the defendant No.1 "Boss" on 17.03.2026 with certificate bearing No. DIL/7/33/2026-BAN and it is pertinent to note that the following summary has been mentioned along with the certified which is reproduced for ease of reference of this Hon'ble Court are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

35. The averments made in the same para with the captions "Plot Summary-The films protagonist, a famous cricket player, has made a name for himself in the cricket world and one day a man repeatedly sends obscene messages and calls to his girlfriend and angered by this Jeevan who works at her house and his friends find the man and beat him up mercilessly and the incident then takes many turns and revolves around the protagonist are all hereby denied as false and misconceived and absurd.

36. The averments made at para 31 that the grant of the aforesaid certificate by Defendant No.3 is in complete disregard of the Plaintiffs' statutory notice, the prior protective orders passed by this Hon'ble Court and the Hon'ble High Court of Karnataka (produced as Document No.5), and the fact that the film is based on the private life of the Plaintiffs and the specific incidents forming the subject-matter of the ongoing trial in S.C. No.1319/2024 which is now pending before



10/16

14
201

~~919~~

~~181~~

the Sessions Court, Bangalore and the certification has been granted without considering the gross violation of the Plaintiffs' fundamental rights under Article 21 of the Constitution of India, the principles of decency, morality, public order, and the prohibition against interference with pending judicial proceedings as mandated under Section 5B of the Cinematograph Act, 1952 are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

37. The averments made at para 32 that the Certificate No. DIL/7/33/2026-BAN dated 17-03-2026 is wholly illegal, arbitrary, mala fide, and without jurisdiction and the said certificate has been issued in violation of the mandatory guidelines framed under Section 5B of the Cinematograph Act, 1952, which expressly prohibit certification of any film that is likely to affect public order, decency, morality, or involves defamation or contempt of Court or is likely to interfere with the administration of justice in a pending criminal trial and the certification, therefore, deserves to be declared as null and void ab initio and cancelled by a decree of this Hon'ble Court are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

38. The averments made at para 33 that the grant of the aforesaid illegal certificate constitutes a fresh and continuing cause of action in favour of the Plaintiffs and the Plaintiffs are now entitled not only to the permanent injunctions prayed for but also to a decree of declaration that the Certificate No. DIL/7/33/2026-BAN dated 17.03.2026 is illegal, null and void and a consequential decree for cancellation/revocation of the said certificate, thereby preventing any public exhibition, release, distribution or streaming of the movie "Boss" in any form whatsoever are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

39. The averments made at para 34 that the Defendant No.2 has himself accepted that the said movie has relevance to the subject-matter contained in S.C. No.1319/2024 when asked by one of the journalists in the press meet aired on Zee Kannada News are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.



10/12

(15)

~~220~~ (182) (202)

The video produced which is allegedly one of the videos in DOCUMENT NO.3 is a created document.

40. The averments made at para 35 that in the event the movie "BOSS" is permitted to be exhibited in cinema halls, multiplexes or theatres, it would cause immediate, widespread and irreparable harm to the Plaintiffs' reputation, privacy and right to fair on-going trial and the plaintiffs are therefore entitled to a decree of permanent prohibitory Injunction against all cinema halls, exhibitors and Theatre owners' from screening or exhibiting the said movie, so prevent any public exhibition pending final decision in the suit are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

41. The averments made at para 36 that as the movie has already received the certification from the Defendant No.3 authority, Defendant No.1 and No.2 in all likelihood will release the movie in theatre, there is a possibility that the Defendant No.1 might release, sell, licence or lease the rights of the movie to any other producer, production company or individual and hence the plaintiffs has filed the present petition against unknown defendants impleaded as Ashok Kumar who may release, publish, distribute or telecast the movie for or on behalf of the Defendant No 1 are all repetitions and the same has been answered suitably in the previous paras.

42. The averments made at para 37 that the cause of action arose during the month of October 2025 when the Defendant No.1 announced that they are producing a movie based on the incidents that had taken place in Plaintiffs life and continues as the Defendant has published marketing material such as posters, promotional interviews and teaser, the cause of action arose within the territorial jurisdiction of this Hon'ble Court and the Plaintiffs reside within the jurisdiction of this Hon'ble Court as such this Hon'ble Court has the jurisdiction to entertain the present proceedings are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

43. The averments made at para 38 that the right to privacy is a fundamental right guaranteed under Article 21 of the Constitution of India, which includes within its ambit the right to informational privacy. Protection of personal and family



[Handwritten signature]

16

~~201~~

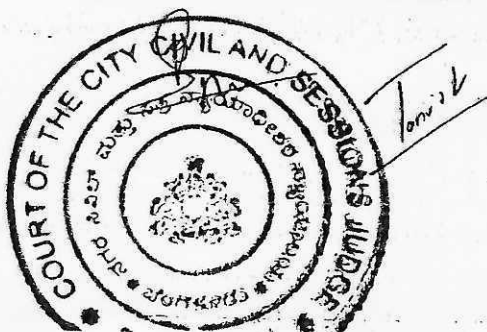
~~183~~

203

life, and the right to be left alone from unwarranted commercial exploitation and public scrutiny are all matter of record. The further averments in the same para to the effect that the movie titled "Boss" and its promotional materials by deliberately incorporating elements that unmistakably mirror the private life of the Plaintiffs, the specific incidents alleged in the pending criminal case, and the family circumstances of the Plaintiff's, constitute a gross invasion of this fundamental right to privacy and personal liberty without the consent or knowledge of the Plaintiffs are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

44. The averments made at para 39 that every person, including a public figure is entitled to protect his/her personality rights figure the exclusive right to control the commercial use of his/her Image, likeness, voice, persona, and any exclusively right to control the commercial use of his/her name, image, likeness, voice, persona and any other attribute that is exclusively identified with him/her by the public and the Defendants herein have unauthorisedly appropriated that plaintiff's personality, the moniker "Boss" (which is having relevance with the Plaintiff No. 1's private life), the reference to attribute arrested, and other distinctive elements associated with Plaintiff No.1, solely for the purpose of commercial gain and sensational promotion of the film. Such misappropriation causes irreparable injury to the goodwill, brand value, and professional reputation of the Plaintiffs are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

45. The averments made at para 40 that the production, promotion, and intended release of the film while the criminal case bearing S.C. No. 1319/2024 is still pending and sub-judice before the LVT Additional City Civil and Sessions Judge, Bengaluru, amounts to a direct interference with the administration of justice and violates the Plaintiffs fundamental right to a fair trial under Article 21 of the Constitution. Any dramatized depiction or reference to the very allegations under trial is bound to prejudice public perception, create a real risk of influencing the course of the on-going trial, and cause grave miscarriage of justice, which cannot be remedied after the film is released or exhibited.

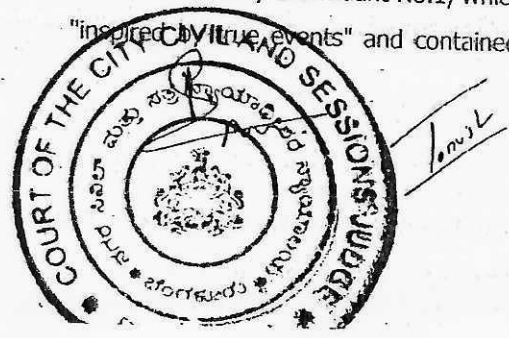


(17) *Handwritten signature* (18H) (20H)

46. It is submitted that even if the Defendants No.1 & 2 claim the film to be a work of fiction, the unmistakable references to the Plaintiffs' life, the specific facts of the pending criminal case, and the portrayal of events in a manner that places the Plaintiffs in a raise and defamatory light before the general public, constitute actionable civil wrong and any prudent persons can come to a conclusion that the said teaser of the movie depicts the personal life of the Plaintiffs. The teaser, press meet, and promotional interviews have already triggered widespread speculation and comparison with the Plaintiffs' life, thereby lowering the reputation of the Plaintiffs in the eyes of the society and causing continuous and irreparable harm to their dignity and standing are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

47. The averments made at para 42 that while freedom of speech and expression is a Cherished constitutional value, the same is not absolute and subject to reasonable restrictions in the interest of decency, defamation, and contempt of court is a matter of record. The further averments that in the present case the Defendants' commercial venture, which seeks to exploit Plaintiffs' ongoing personal tragedy and sub-judice trial off unjust enrichment, profit, and publicity, cannot be permitted to override the Plaintiffs' fundamental rights to privacy, reputation, and fair trial and the balance tilts decisively in favour of granting protection to the Plaintiffs, as any post-release remedy would be inadequate and the damage would be irreversible are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

48. The averments made at para 43 that the cause of action to institute the present suit first arose in the month of October 2025, when the Plaintiffs came to know through reliable sources, family members, and well-wishers that Defendant No.1 was producing a movie under the title "BOSS" based on the life events of the Plaintiffs, including the specific incidents forming the subject matter of the sub-judice criminal case in S.C. No.1319/2024 pending before the LVI Additional City Civil and Sessions judge, Bengaluru. The Cause of action further accrued and crystallized on 09.33 2026 and upon the release of the teaser of the said movie by Defendant No.1, which openly proclaimed that the film was "inspired by true events" and contained audio-visual elements unmistakably



18

~~185~~ 185

205

forming to the Plaintiffs private life, family are circumstances, the alleged crime, arrest of a celebrity, and other distinctive facts associated with Plaintiff No.1 and the cause of action further arose when the Plaintiffs sent a statutory Notice u/s 10 of CPC to CBFC on 13.03.2026 seeking non-clearance/registration of the title "Boss the cause of action further arose when the certificate was issued by the CBFC on 17.03.2026 and declaring the date of release to be 14.04.2026. The cause of action is continuing in nature, as Defendant No.1 has continued to promote the movie television and news through posters, advertisements on channels, press meets, interviews by the Defendant No.2, and combination of the teaser, trailer and related promotional on the digital. Platforms of Defendant No. 5 to 7 [Facebook/Instagram, X-Corp, and YouTube), all of which are all cause fresh cause of action and within the territorial of this Hon'ble Court on a daily basis are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

49. The averments made at para 44 that the certificate has already been issued by the CBFC and the imminent threat of theatrical release, streaming is a matter of record. The further averments that distribution, or transfer of rights to third parties (including unknown persons like Defendant No.12) further perpetuate the cause of action and the Plaintiffs reside within the jurisdiction of this Hon'ble Court, the impugned acts (including publication, promotion, and potential exhibition of the film) have taken place and continue to take place within Bengaluru, and the harm to the Plaintiffs' reputation, privacy, and right to fair on-going trial is felt and materialized here are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same. The further averments that this Hon'ble Court has the territorial and pecuniary jurisdiction to entertain and try the present suit is a matter of record.

50. The averments made at para 45 that no part of the cause of action is barred by limitation, as the acts complained of are recent, continuing, and fresh instances of invasion misappropriation of personality rights, and interference with sub-judice proceedings are occurring even as of the date of filing of this suit and the Plaintiffs have been vigilantly protecting their rights through prior proceedings (as detailed in paragraph 18 supra), and the present suit is filed



Janu 2

(19)

~~22/11~~ ~~18/6~~ (206)

promptly upon the CBFC issuing certificate, discovery of the teaser release and promotional activities that directly violate those protections are all hereby denied as absolutely false, baseless, misconceived and vexatious. The Plaintiffs are put to strict proof of the same.

51. The averments made at para 46 that the Plaintiffs seek leave of this Hon'ble Court to bring on record the relevant information, documents, array necessary parties and amend the plaint, if necessary, after filing the above suit and reserves the right to do the needful and the suit is valued as per the valuation slip annexed to the Plaint and the same has been paid in terms of the provisions of the Karnataka Court Fees & Suit Valuations Act, 1958 are all matter of record.

52. Without prejudice to the above these Defendants submits true facts as follows:

53. It is further submitted that the Defendant No. 1 is the Producer of the film in question and Defendant No. 2 is the Director of the film. The Defendant No. 1 herein is registered under the Kannada Film Chamber of Commerce Gandhi Nagar, Bengaluru-560009 the concerned authorities have issued necessary title and banner registration certificate to that effect. It is further submitted that the Defendant No. 2 herein is the Director of the movie in question. The Defendant No. 1 and 2 are the only persons directly involved in the creation, production, and exhibition of the film in question and are the only necessary and proper parties to the suit. Hence, the remaining defendants have no substantial or direct interest in the subject-matter of the suit and are not indispensable to the adjudication of the dispute.

54. It is further submitted that the Defendant No. 2 herein is a Director in Karnataka. The Defendant No. 2 herein has so far directed 4 Kannada movies namely Karnataka Ayodhyapuran, Mr. Natwarlal, Gramapanchayathi and Boss. The Defendant No. 2 herein has earned great name and reputation in the field of Direction of Kannada movies across Karnataka.

55. It is submitted that the under the banner of SIRI PRODUCTIONS the Defendant No. 1 has produced a Kannada Movie namely "BOSS" which is produced by Sri. Tanush. It is further submitted that the said Producer Tanush has performed the lead role in the said movie. It is further submitted that movie 'Boss' is completed and the defendant No. 1 and 2 herein have obtained necessary



Tamil

20

~~995~~

~~187~~

207

Certificate bearing No. DIL/7/33/2026-BAN dated 17.03.2026 issued by Defendant No.3 (Central Board of Film Certification) in favour of the movie "BOSS under the provisions of the Cinematograph Act, 1952. It is further submitted that the defendant No. 1 and 2 also started promoting the said movie on social media platforms and electronic media in accordance with law.

56. It is submitted that the Defendant No. 3 is the Central Board of Film Certification (CBFC), which has already issued certification to the film on 17.03.2026 under the Cinematograph Act 1952 and the relevant rules, which clearly indicates that the film has been examined by the statutory authority and found to be fit for public exhibition without any objectionable or unlawful content, and the certification process being a statutory, quasi-judicial exercise, courts are expected to respect the expert opinion of the Board and not to interfere lightly with a certified film except in cases of clear violation of law or material injury to public interest.

57. The Defendant No. 4 is the Karnataka Film Chamber of Commerce (KFCC), which is an industry-related association and has no role in the production, certification, or exhibition of the film, and neither Defendant No. 1 nor Defendant No. 2 has entered into any business, transaction, or title-registration with Defendant No. 4 in relation to the film, the film has not been registered and no banner or title has been recorded with this body, and the inclusion of Defendant No. 4 in the array of parties is therefore entirely incorrect and mal-fide, as it bears no legal or practical connection with the present suit, and it is submitted that Defendant No. 4 is an unnecessary and improper party and is liable to be struck off from the array of parties under Order 1 Rule 10 CPC.

58. The Hero in the movie is a Cricketer by profession. The said Hero is named as "Tanush". Tanush plays for BCB Cricket Club. Tanush due to his cricketing skills is widely regarded as one of the greatest Cricketer and due to this, the fans conferred Tanush a title namely "Boss". It is further submitted that Tanush is also shown in the movie as a humble man and generous person who believe in giving respects to everyone around him.

59. It is further relevant to state that the proposed movie 'Boss' is not yet released in Movie Theatres or any other Platform like Netflix, Amazon etc., It is further relevant to state that the proposed movie 'Boss' is not at all available in the



Tanush

(2)

~~7/2/24~~ ~~188~~ 208

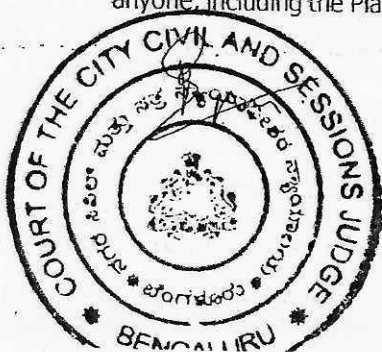
Public domain. Under these circumstances, the Plaintiffs herein have filed the present suit with their wild guessing/imaginings and have formed a self-opinion that the proposed movie 'Boss' is filmed based on the events occurred in the Charge Sheet vide Spl. C. C. No. 1319/2024 pending on the file of this Hon'ble Court.

60. It is submitted that movie in question does not contain any name, photographs, family details, profession of Plaintiff No. 1, or any other particulars, which may lead to the disclosure of alleged similarities of incident which is subject matter of Spl. C. C. No. 1319/2024 as alleged by the Plaintiffs. Therefore, none of the provisions of Cinematography Act have not been violated by the Defendant No. 1 and 2 in any manner whatsoever.

61. These Defendants further submits that the making of movie in question is a fundamental right of the Defendant No. 1 and 2 herein. In fact, this scope of right to freedom of speech and expression has been expanded to include a filmmaker's right to express their thoughts and ideas using the medium of cinema. It is further submitted that the proposed movie in question does not poses a threat to sovereignty and security of the country, national peace or creates wrong views or opinion amongst the public or fans of Plaintiff No. 1 in any manner. In view of this, the Defendant No. 3 has accorded the clearance to the proposed movie in accordance with the provisions of the Cinematograph Act, 1952, and Cinematograph (Certification) Rules, 1983, which prescribe the parameters and process for censorship of films and grant of certification in respect of films declared to be fit for public exhibition.

62. It is further submitted that there is a clear disclaimer at the initial portion of the movie in question that the same is a fictional work and the same is not inspired by the real life events of Plaintiff No. 1 and 2 in any manner. Therefore, there is nothing related to the Plaintiffs and thus, the movie in question does not have any adverse effect on the alleged reputation and dignity of the Plaintiffs herein in any manner.

63. It is further submitted that the restriction on public viewing of an artistic work should be as per the prescription of law; thus, since the movie in question is completely a fictional work and not going harm the reputation and dignity of anyone, including the Plaintiff No. 1 and 2, therefore, the prayer for main reliefs



10/1/24

22

~~207~~

~~189~~

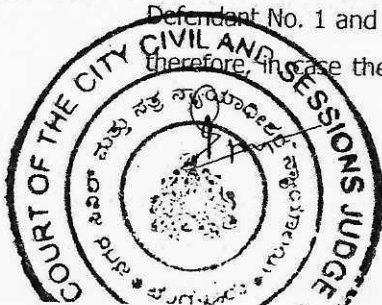
209

and also interim reliefs sought by the Plaintiffs herein does not deserve to be accepted.

64. It is further submitted that the present suit itself as filed by the Plaintiffs herein is based only on presumptions of the alleged facts that the movie in question was based on criminal trial against the Plaintiff No. 1 and would thus harm the reputation and dignity of the Plaintiff No. 1. It is hereby submitted that the Defendant No. 1 and 2 have exercised their lawful rights in making the movie in question and therefore their ideas, thoughts, fictions and intellectuals are required to be protected by the Law. Thus, no right, including the right to privacy qua the Plaintiff No. 1, has been violated by these defendants.

65. It is further submitted that the proposed Movie in question is a creative fiction produced and Directed by the defendant No. 1 and 2 herein in exercise of their constitutional right conferred by Article 19(1)(a) of the Constitution of India. The contents of the proposed Movie have no connection whatsoever with the subject matter of Spl. C. C. No. 1319/2024. It is further submitted that the story has no relationship with the Accused persons, the deceased person or the witnesses in the criminal case in Spl. C. C. No. 1319/2024. It is further submitted that the Defendant No. 1 and 2 have also made disclaimer statement put up in beginning of the movie is sufficient notice to the public that the Movie in question is distinct from the real events that transpired in the criminal case in Spl. C. C. No. 1319/2024. Without prejudice and without admitting the claims of the Plaintiffs it is submitted that the only resemblance in the Movie appears to be the name called 'BOSS' which is quite casual and tenable. There are other movies named Boss which was released in 1996 acted by Prabhakar (Tiger Prabhakar) directed by Bhavani Shankar produced by C. Peter Joseph and in 2013 Boss was produced by Ashwin Varde acted by Akshay Kumar. The reputation of the Plaintiffs or right to privacy will not be infringed by the release and telecast of the Movie. The contents of the movie have no tendency to affect the fair trial of the criminal case against the Plaintiff No. 1 herein and thereby interfere with the administration of justice by the Plaintiffs herein through present suit will be amounting to contempt of court.

66. It is further submitted that the Plaintiffs herein have no prima facie case in their favour, as amongst others, a huge amount has already been invested by the Defendant No. 1 and Sri. Tanush who is the Producer of the present film and therefore, in case the relief prayed for in the present suit is granted to the



[Handwritten signature]

53

~~2028~~ 19

210

Plaintiffs then the same would cause an unwarranted irreparable loss to the Defendant No. 1 and film Producer Sri.Tanush.

67. These Defendants submits that there is balance of convenience in favour of the Defendant No. 1 and 2 in the present case. It is further submitted that the news related to the movie in question was started long time back and the present suit is preferred just few days after the movie teaser which was aired on 09.03.2026. The movie in question has already been gearing to be released over the OTT Platforms and Theatres on 24.04.2026. Therefore, at this juncture, if any interim order, as prayed by the Plaintiffs herein, is passed against the movie in question, the same would result into unwarranted huge financial loss, pain, agony, stress to the Defendant No. 1 producer of the film. Thus, in the given factual matrix, on that count also, this Hon'ble Court would not find any case allegedly made out by the Plaintiffs for passing any interim order as prayed by the Plaintiffs herein. It is further submitted that this Hon'ble Court needs to see as to whether any case of irreparable loss was made out by the Plaintiffs in the present case and the Plaintiffs herein can seek compensation against damages and defamation if there is any violation of the reputation and dignity of the Plaintiffs herein by the acts of the Defendants herein. However, considering the facts and circumstances of the present case, it is established and demonstrated that the Defendant No. 1 and 2 would suffer huge loss, injury, mental pain and agony in the event if the I.A. No. 1 is allowed as prayed for. It is further submitted that as per the teaser of the movie in question, there would be nothing directly found related to the Plaintiff No. 1 which could persuade this Court to grant the relief prayed for in the stay application filed by the Plaintiffs.

68. It is further submitted that neither Defendant No. 1 nor Defendant No. 2 has registered any cinema title in relation to the film with Defendant No. 4 (KFCC), nor is there any legal requirement to do so in the present facts and circumstances, and the suit is not maintainable on the basis of any alleged title-registration default before KFCC, and the Plaintiffs have not pleaded any specific statutory or contractual right arising from such registration and also Plaintiff No. 1 has not registered any banner or title in relation to the film, and the present suit is therefore premature and not maintainable in law.



Sri. Tanush

24

~~229~~ ~~191~~ 211

69. It is submitted that the Plaint is defective and liable to rejection under Order 7 Rule 11 CPC, as it does not disclose the complete addresses of Defendant Nos. 1 and 2, thereby causing prejudice to the Defendants in defending the suit and receiving notices and orders, and it also does not bear the signature of Plaintiff No. 1, and the plaint is vague, speculative, and fails to disclose a clear cause of action or any cognizable legal injury.

70. It is submitted that the Plaintiffs obtained an ex-parte stay order without proper service of summons, and mere service through WhatsApp, without sending complete pleadings and documents, does not constitute valid service under Order 5 Rule 9 CPC and Section 27 CPC, and such defective service amounts to a denial of the opportunity of hearing and violates the principles of natural justice under Articles 14 and 21 of the Constitution of India.

71. The title "Boss" is a generic term used widely in the film industry and in general usage, and it is a common and descriptive expression, and no monopoly can be claimed over such a generic title; the Plaintiffs have no exclusive right or registered title to the word "Boss" in relation to any film or business, and the use of such a title by the Defendants does not by itself constitute any actionable tort or infringement. The entire suit is founded on assumptions, conjectures, and surmises rather than on any concrete factual or legal basis, and the Plaintiffs have failed to specifically point out any scene, dialogue, poster, or trailer that causes actionable defamation, infringement of personality rights, or other legal injury, and the suit is, therefore, a loose attempt to suppress artistic freedom on the basis of speculative grievances.

72. It is specifically denied that the film is based on any real life event or connected to any pending criminal case, the Director has publicly stated that the film is completely fictional and does not portray any real life incident or person, and the protagonist of the film is portrayed as a cricketer engaged in social service, with no involvement in any crime, and the storyline of the film does not in any manner depict any incident connected to the Plaintiffs, nor does it seek to



Taru 12

25

~~220~~

~~192~~

212

defame or disparage them. The Defendants no 1 and 2 have conducted multiple press meets on 29.10.2025, 09.03.2026, and 25.03.2026, at all of which Defendants Nos. 1 and 2 have clearly stated that the film is purely fictional and concept based and has no connection with any real life incident or with Special C C No. 1319 of 2024, videos of all these press meets, where Defendants No. 1 and 2 have spoken about the film "Boss", have been placed on record before this Hon'ble Court in the form of a pen-drive, which has been filed and produced in Court as part of the evidence.

73. The Central Board of Film Certification (CBFC) has granted certification to the film on 17.03.2026, which indicates that the film does not contain any objectionable material as per the statutory authority entrusted with such expert evaluation, It is well-settled that the law relating to films and freedom of expression is governed by constitutional principles, in K.A. Abbas v. Union of India, (1971) 2 SCC 781, the Hon'ble Supreme Court held that films are a medium of expression protected under Article 19(1)(a), though subject to reasonable restrictions under Article 19(2), in S. Rangarajan v. P. Jagjivan Ram, (1989) 2 SCC 574, the Court categorically held that freedom of expression cannot be suppressed on account of threat of demonstration, processions, or threats of violence, and that once a film is certified it should not be lightly interfered with by courts, in Bobby Art International v. Om Pal Singh Hoon, (1996) 4 SCC 1, the Supreme Court held that courts should not sit as a super-censor board once the film has been certified by the statutory authority, in F.A. Picture International v. Central Board of Film Certification, (2002) 5 SCC 262, it was held that once a film is certified, courts must exercise restraint in granting injunctions restraining exhibition in Viacom 18 Media Pvt. Ltd. v. Union of India, (2014) 1 SCC 417, the Hon'ble Supreme Court restrained States from interfering with the exhibition of a certified film and upheld the freedom of expression of filmmakers; in Nachiketa Walhekar v. Central Board of Film Certification, (2018) 15 SCC 1, it was reiterated that creative freedom must be protected and that courts should interfere only in cases involving a clear violation of law or injurious effect to public interest, in light of these authorities, the present film being duly certified by the CBFC on 17.03.2026 and Adarsh Cooperative Housing Society Ltd., Vs Union of India [AIR 2018 SC 1480 Writ petition (civil) No 129 of 2018] "courts decide cases based on evidence and not cinematic portrayal, and mere pendency of proceedings is not a ground



Handwritten signature/initials

(26)

~~281~~ (798) (218)

to restrain a film duly certified by CBFC" and "The doctrine of sub-judice may not be elevated to negate the right to freedom of speech and expression"

74. The Plaintiffs' claim is based on mere assumptions and conjectures and not on any ascertainable legal injury or defamation with particulars. The suit appears to be an abuse of the process of the Court, intended to suppress artistic freedom and to kill creative expression by using an ex-parte stay order as a tool of pressure, and the ex-parte stay order is contrary to settled law, as it was passed without proper service and in the absence of a prima facie case warranting interference with a certified film, and the Defendants are protected under Article 19(1)(a) of the Constitution of India, and the present proceedings materially infringe upon their fundamental right to freedom of expression. As a direct consequence of the ex-parte stay order, Defendant No. 1 has suffered considerable financial losses of approximately ₹60,00,000/- (Rupees Sixty Lakhs Only), advance payments have been made for release, distribution, and publicity, and the inability to exhibit the film as scheduled has caused severe commercial prejudice, and the Defendants are also facing reputational damage, threats, and harassment from third parties relying on the stay order, and the public interest in lawful and certified artistic expression is being prejudiced.

75. It is submitted that Temporary Injunctions generally are granted based on the "Triple Test" under Order 39 of the Code of Civil Procedure. The three key parameters are 1] a prima facie case, 2] balance of convenience and 3] irreparable loss and injury. In order to seek an injunction, the applicant must establish a strong case and demonstrate that refusal of the order will cause substantial and un-compensable harm. In the present case, the Plaintiffs herein have utterly failed to demonstrate these three basic elements before this Hon'ble Court to obtain relief of temporary injunction as prayed in I.A. No. 1 in question for the following reasons.

76. **Right to privacy:-** It is submitted that in the instant case the Plaintiffs herein have failed to make out a case for grant of interim injunction to restrain the release of the movie in question. It is submitted that the movie in question does not relate to the incident covered under the Special Criminal Case No. 1319/2024 pending on the file of this Hon'ble Court. It is relevant to state that the Plaintiff No. 1 is an actor by profession. However, the Hero in the movie



Tanishk

27

989

THH

THH

in question is a Cricketer by profession. It is further submitted that the name of the Hero in the movie is Tanush and also called as BOSS by his fans in the movie. It is further submitted that the other characters in the entire movie are solely created based on frictions, imaginations. It is further submitted that the Hero at the end of the movie in question shown as elected [MLA] of a particular Assembly Constituency. Thus, the contents of the movie and the contents of the incident which is subject of Spl. C.C. No. 1319/2024 are totally different. Therefore, the right to privacy of the plaintiffs is not at all affected and there shall be no humiliation of the Plaintiffs by virtue of release of the movie in question.

77. The right to fair trial: - In the present case the Plaintiffs have falsely contended that the movie in question would affect the fair trial of the Plaintiff in Spl. C.C. No. 1319/2024. It is relevant to state that in a number of cases the Hon'ble Apex Court of India has held that though right to fair trial is a fundamental right, but the courts and investigating agencies do not rely upon cinematographic films to render a decision or carrying on their investigations. Without prejudice and without admitting the claim of the Plaintiffs herein it is submitted that in the instant case the plaintiffs herein have failed to explain as to whose right to fair trial has been claimed and in what manner the movie would impact the right of fair trial of any of the stakeholders.

78. Defamation and emotional trauma:-It is submitted that the movie in question is not a libel or slanderous in nature to the Plaintiffs herein. The portrayal of Hero depicted in the movie in question is not at all based on the incident covered under the criminal case in Spl. C.C. No. 1319/2024. In fact, the Hero in the movie has been shown in a good manner such as humble person, generous persons etc. The Hero in the movie has no connection to the alleged murder of a person. In fact all the characters depicted in the movie are completely fictional and out of imaginations. It is further submitted that the plaintiffs herein have pleaded about alleged emotional trauma in the present case. However, it is relevant to state that it is well settled principles of law that emotional trauma per se may be relevant as a component of defamation, but cannot be the sole basis for making a prima facie case in favour of the applicant/s.



(28)

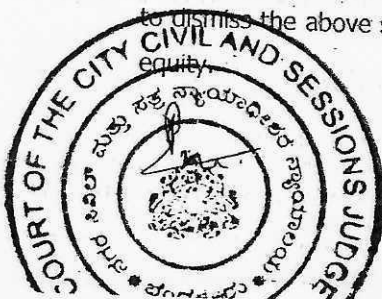
~~233~~ (195) (215)

79. **The balance of convenience:** - It is submitted that the it is almost for the last one year that the movie in question has been in making. The Defendant No. 1 and 2 have also obtained necessary approvals, permissions from the Censor Board for the release of the movie and the Defendant No. 1 and 2 almost on the verge of releasing the movie by concluding the teasers in the electronic and Social Media and at this juncture the Plaintiffs herein have sought for injunction. Further the Defendant No. 1 herein has already been spent in making the movie huge amount of money. Therefore, the balance of convenience lies heavily in favour of the Defendant No. 1 and 2. It is further submitted that the Plaintiffs herein shall have a remedy of seeking damages in case in violation of right of the plaintiffs is established on screening the movie in question.

80. **LOSS AND INJURY:-** It is further submitted that in the instant case the Defendant No. 1 and 2 for the above reasons and bonafide facts shall be subjected to irreparable loss and injury after having invested their money in preparing the movie in the event if the injunction is granted as prayed for in I.A. No. 1. On the other hand, the plaintiffs have not been able to demonstrate what irreparable loss and injury caused to the plaintiffs if the movie is screened. Thus, it may thus be concluded that the plaintiffs have not been able to establish any of the three limbs i.e. prime facie case, balance of convenience or irreparable loss or injury in their favour. The plaintiffs are, therefore, the Plaintiffs herein are not entitled to injunction.

Thus, in view of the foregoing, it is most respectfully prayed that this Hon'ble Court may be pleased to dismiss the suit as being devoid of merits, not maintainable, and barred by lack of legal injury, vacate the ex-parte stay order granted against the Defendants, strike off the unnecessary parties (Defendant Nos. 3, 4, and 5 to 12) from the array of parties, and pass such further orders as this Hon'ble Court deems fit in the interest of justice, equity, and good conscience.

Wherefore, it is humbly prays to this Hon'ble Court that it may kindly be pleased to dismiss the above suit with exemplary costs in the interests of justice and equity.



Tanusik

(29)

234 (196) (216)

Advocate for Defendant No. 1 & 2

Defendant No. 1 & 2

Verification

We the Defendant No. 1 and 2 do hereby declare that what is stated above is true to the best of their knowledge, information and belief.

Bengaluru

Date: 10/6/26
15/4/26

Defendant No. 1 & 2



119 224

1516 126

* Copying SHEETS produced on _____
CHARGES

* Copying SHEETS required to be produced on _____
CHARGES

2216126

* Applicant required to appear on _____
* Applicant appears on _____

1516126 *elt*

* Now ready on _____
* Delivered on _____
* By _____

[Signature]

32 905 197 217

IN THE COURT OF HON'BLE ADDITIONAL CITY CIVIL AND SESSIONS JUDGE AT
BENGALURU

O.S. No. 2151/2026

BETWEEN:

SRI. DARSHAN SRINIVAS
AND ANOTHER

PLAINTIFFS

AND:

SIRI PRODUCTIONS
AND OTHERS

DEFENDANTS

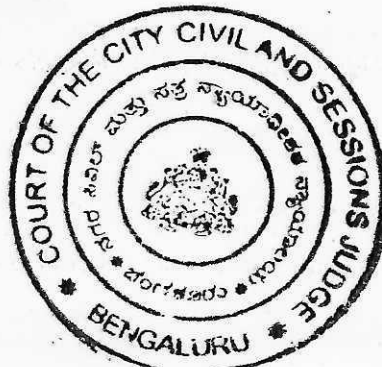
MEMO

The undersigned humbly submits that the Defendant No. 1 and 2 herein are adopting their detailed Written Statement filed as Statement of Objections to the I.A. No. 1 filed by the Plaintiff in the above case. Hence, it is humbly prays to this Hon'ble Court that it may kindly be pleased to consider and treat the Written Statement of Defendant No. 1 and 2 as Statement of Objections to the I.A. No. 1 in the above matter in the interests of justice and equity.

Bengaluru

Date: 10-6-26
15/4/26

Advocate for Defendant No. 1 and 2



(57) (14)

Applicant appeared for on 15/6/26
1. Copying SHEETS produced on _____
CHARGES _____
2. Copying SHEETS required to be produced on _____
CHARGES _____
3. Applicant required to appear on 9/2/6/26
4. Applicant appeared on _____
5. Copy ready on 15/6/26
6. Copy delivered on _____
7. _____
8. _____

This is the annexure Q stated in the Affidavit of M. Jayalakshmi, Darshan


NOTARY

218

921/198

24628/26

Darshan Srinivas

ANNEXURE - D



NC: 2026:KHC:24468
WP No. 7473 of 2026

IN THE HIGH COURT OF KARNATAKA AT BENGALURU

DATED THIS THE 30TH DAY OF APRIL, 2026

BEFORE

THE HON'BLE MR. JUSTICE SACHIN SHANKAR MAGADUM

WRIT PETITION NO. 7473 OF 2026 (GM-RES)

BETWEEN:

1. MR. DARSHAN SRINIVAS
AGED ABOUT 47 YEARS,
S/O. LATE THOOGUDEEPA SRINIVAS
#217, THOOGU DEEPA NILAYA,
F ROAD, IDEAL HOME TOWNSHIP,
RAGARAJESHWARI NAGAR,
BENGALURU, KARNATAKA - 560 098.

...PETITIONER

(BY SRI. PRATHAM N., ADVOCATE)

AND:

1. UNION OF INDIA
MINISTRY OF INFORMATION AND BROADCASTING,
ROOM NO.655, A- WING,
SHASTRI BHAWAN,
NEW DELHI-110 001.
REPRESENTED BY ITS SECRETARY
2. THE SECRETARY,
MINISTRY OF ELECTRONICS AND
INFORMATION TECHNOLOGY (MEITY),
ELECTRONICS NIKETAN, 6 CGO COMPLEX,
LODHI ROAD, NEW DELHI - 110 003.

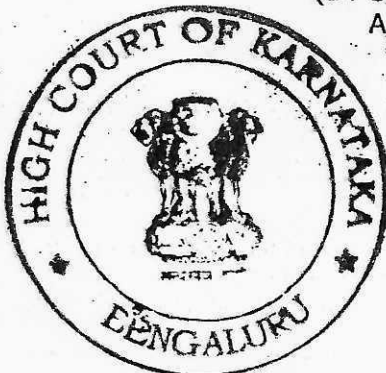
...RESPONDENTS

(BY SRI. ARAVIND KAMATH, ADDITIONAL SOLICITOR GENERAL
A/W SRI. KUMAR M N, CGSC FOR R1 & R2)

Digitally
signed by
CHAITHRA A



Location:
HIGH
COURT OF
KARNATAKA



This Certified copy contains 21 pages
And Copying charges with of ₹..... 6,2 18
Received

219 927 109

-2-



NC: 2026:KHC:24468
WP No. 7473 of 2026

THIS WRIT PETITION IS FILED UNDER ARTICLE 226 OF THE CONSTITUTION OF INDIA, PRAYING TO DIRECT THE RESPONDENT NOS.1 AND 2 TO REGISTER THE COMPLAINT DATED 16.01.2026 (ANNEXURE-A) AND ISSUE SHOW CAUSE NOTICE TO ALL THE SAID MEDIA CHANNELS AND TAKE ACTION IN ACCORDANCE WITH CABLE TELEVISION NETWORKS ACT 1995, CABLE TELEVISION NETWORKS RULES 1995 R/W INFORMATION TECHNOLOGY ACT OF 2000 AND INFORMATION TECHNOLOGY (INTERMEDIARY GUIDELINES AND DIGITAL MEDIA ETHICS CODE) RULES, 2021 AND ETC.,

THIS WRIT PETITION HAVING BEEN HEARD AND RESERVED FOR ORDERS ON 09.04.2026, THIS DAY ORDER WAS PRONOUNCED THEREIN, AS UNDER:

CORAM: HON'BLE MR. JUSTICE SACHIN SHANKAR MAGADUM

CAV ORDER

The captioned writ petition is filed seeking the following reliefs:

"A. Issue a writ, order or direction in the nature of mandamus or any other appropriate writ directing the Respondent No.1 & 2 to register the complaint dated 16.01.2026 (Annexure A) and issue show cause notice to all the said Media Channels and take action in accordance with Cable Television Networks Act 1995, Cable Television Networks Rules, 1995 r/w Information Technology Act of 2000 and





220

220-3-

200

NC: 2026:KHC:24468
WP No. 7473 of 2026

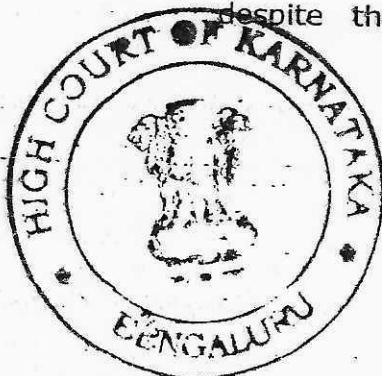
Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021;

B. Direct Respondent No.1 to initiate proceedings for suspension of broadcast licenses or imposition of penalties under Chapter III of the Cable Television Networks (Regulation) Act, 1995, against non-complaint entities inter terms of the Complaint dated 16.01.2026 (Annexure A) or/and refer the prima facie contempt to the appropriate contempt jurisdiction; and

C. Pass any other order(s) as this Hon'ble Court may deem fit in the facts, and circumstances of the present case, in the interest of justice, equity and fair play."

2. The petitioner, a Kannada film actor and producer, is aggrieved by a sustained and targeted media campaign in relation to Crime No.250/2024 registered on 09.06.2024 by Kamakshipalya Police Station for offences punishable under Sections 302 and 201 of the IPC, 1860.

3. It is the specific case of the petitioner that, despite the trial being at a nascent stage, various



~~201~~ ~~201~~ 201

- 4 -

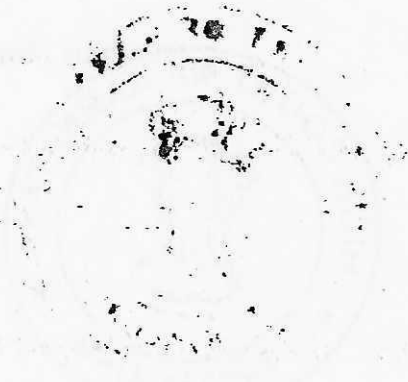
NC: 2026:KHC:24468
WP No. 7473 of 2026



television channels and digital platforms have indulged in media-driven adjudication, disseminating speculative narratives, selectively leaked materials, and unverified allegations, thereby engineering public perception and impairing the petitioner's right to a fair trial.

4. The petitioner and his wife secured interim injunction orders from competent civil courts restraining publication of confidential material. Further, by order dated 10.09.2024, this Court restrained respondent Nos.3 to 40 from disseminating charge sheet material and directed respondent No.4 to take action in the event of violation of the Programme Code.

5. This Court therefore deems it fit to extract the ex parte order of injunction granted by the City Civil and Sessions Court in O.S.No.6082/2024 and the order passed by this Court in W.P.No.24836/2024 on 10.09.2024. The same read as under:



230 229 240 202

- 5 -



NC: 2026:KHC:24468
WP No. 7473 of 2026

Order passed in O.S.No.6082/2024

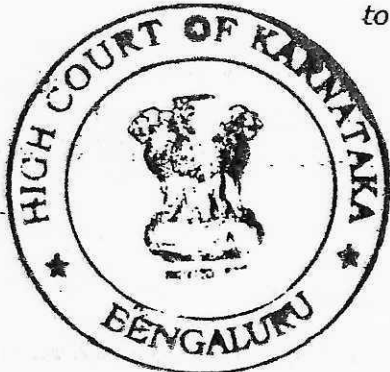
"The defendants are hereby restrained by way of this *ex parte ad-interim* TI order, from airing, printing, publishing any statement in relation to the investigation being under taken by Kamakshipalya Police against Sri. Darshan Srinivas who is arrayed as accused No.2 and from airing, printing, publishing any statement about the final report *inter alia* FSL reports, confessional statements and holding debate/discussion/interview on the final report pertaining to FIR No.0250/2024 pending adjudication before XXIV ACMM Court, Bengaluru."

Order passed in W.P.No.24836/2024

"ORDER

(i) Respondents 3 to 40 are hereby restrained from publishing, printing, airing and disseminating confidential information contained in the charge sheet in relation to Crime No.0250/2024 registered by the Kamakshipalya Police Station, till the next date of hearing.

(ii) Respondent No.1 to communicate this order to respondents 3 to 40.





Needless to state that respondent No.1 to take appropriate action against respondents 3 to 40, if they telecast, print, air or publish any statements in violation of the Cable Television Network Rules, 1994."

6. Despite these judicial interdictions, it is alleged that the media continues to telecast content in violation of statutory provisions and binding court orders.

7. Heard learned counsel for the petitioner and learned CGSC for the respondents. Perused the records. The following points arise for consideration:

(i) Whether respondent authorities are under a statutory obligation to act on the complaint dated 16.01.2026?

(ii) Whether the impugned media reportage constitutes violation of statutory provisions and judicial orders?

(iii) Whether interference under Article 226 is warranted?





Findings on Point Nos.(i) to (iii):

8. For the sake of convenience, the relevant provisions are extracted as under:

"Section 79 (3) (b) of the Information Technology Act, 2000

79. Exemption from liability of intermediary in certain cases.-

(1) Notwithstanding anything contained in any law for the time being in force but subject to the provisions of sub-sections (2) and (3), an intermediary shall not be liable for any third party information, data, or communication link made available or hosted by him.

(2) The provisions of sub-section (1) shall apply if- (a) the function of the intermediary is limited to providing access to a communication system over which information made available by third parties is transmitted or temporarily stored or hosted; or

(b) the intermediary does not-

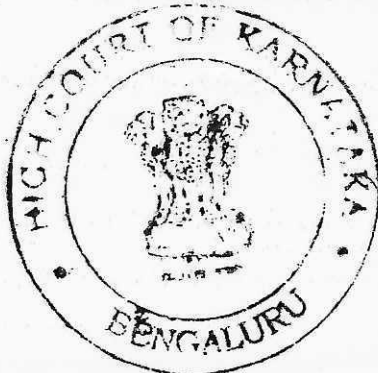
(i) initiate the transmission,

(ii) select the receiver of the transmission, and

(iii) select or modify the information contained in the transmission;

(c) the intermediary observes due diligence while discharging his duties under this Act and also observes such other guidelines as the Central Government may prescribe in this behalf.

(3) The provisions of sub-section (1) shall not apply if-





HC-KAR

9/13 2025 2025

- 8 -

NC: 2026:KHC:24468
WP No. 7473 of 2026

(a) the intermediary has conspired or abetted or aided or induced, whether by threats or promise or otherwise in the commission of the unlawful act;

(b) upon receiving actual knowledge, or on being notified by the appropriate Government or its agency that any information, data or communication link residing in or connected to a computer resource controlled by the intermediary is being used to commit the unlawful act, the intermediary fails to expeditiously remove or disable access to that material on that resource without vitiating the evidence in any manner. Explanation.—For the purposes of this section, the expression —third party information means any information dealt with by an intermediary in his capacity as an intermediary.

Information Technology (Intermediary Guidelines Technology Intermediary Guidelines and Digital Media Ethics Code) Rules, 2024 Digital Media Code) Rules.

Rule 3 (7) (b) an intermediary, on whose computer resource the information is stored, hosted or published, upon receiving actual knowledge in the form of an order by a court of competent jurisdiction or on being notified by the Appropriate Government or its agency under clause (b) of

sub-section (3) of section 79 of the Act, shall not host, store or publish any unlawful information, which is prohibited under any law for the time being in force in relation to the interest of the sovereignty and integrity of India; security of the State; friendly relations with foreign States; public order; decency or morality; in relation to contempt of court; defamation; incitement to an offence relating to the above, or any information which is prohibited under any law for the time being in force.



AAA (226)

- 9 -

NC: 2026:KHC:24468
WP No. 7473 of 2026



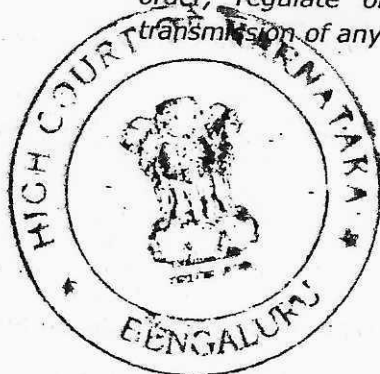
Provided further that if any such information is hosted, stored or published, the intermediary shall remove or disable access to that information, as early as possible, but in no case later than thirty-six hours from the receipt of the court order or on being notified by the Appropriate Government or its agency, as the case may be.

Cable Television Networks (Regulation) Act, 1995

19. Power to prohibit transmission of certain programmes in public interest.—Where 2 [any authorised officer], thinks it necessary or expedient so to do in the public interest, he may, by order, prohibit any cable operator from transmitting or re-transmitting 3 [any programme or channel if, it is not in conformity with the prescribed programme code referred to in section 5 and advertisement code referred to in section 6 or if it is] likely to promote, on grounds of religion, race, language, caste or community or any other ground whatsoever, disharmony or feelings of enmity, hatred or ill-will between different religious, racial, linguistic or regional groups or castes or communities or which is likely to disturb the public tranquillity.

20. Power to prohibit operation of cable television network in public interest.—4 [1] Where the Central Government thinks it necessary or expedient so to do in public interest, it may prohibit the operation of any cable television network in such areas as it may, by notification in the Official Gazette, specify in this behalf. 5

[(2) Where the Central Government thinks it necessary or expedient so to do in the interest of the— (i) sovereignty or integrity of India; or (ii) security of India; or (iii) friendly relations of India with any foreign State; or (iv) public order, decency or morality, it may, by order, regulate or prohibit the transmission or re-transmission of any channel or programme.





(3) Where the Central Government considers that any programme of any channel is not in conformity with the prescribed programme code referred to in section 5 or the prescribed advertisement code referred to in section 6, it may by order, regulate or prohibit the transmission or re-transmission of such programme].

Cable Television Networks Rules, 1994

Rule 6 (1)

(d) Contains anything obscene, defamatory, deliberate, false and suggestive innuendos and half truths;

(e) Is likely to encourage or incite violence or contains anything against maintenance of law and order or which promote-anti-national attitudes;

(f) Contains anything amounting to contempt of court;

(i) Criticises, maligns or slanders any individual in person or certain groups, segments of social, public and moral life of the country ;“

9. The Cable Television Networks (Regulation) Act, 1995 read with the Cable Television Networks Rules, 1994 prescribes a strict regulatory regime. Rule 6 of the Programme Code prohibits programmes which are defamatory, misleading, contemptuous of court, prejudicial to public order, or which malign individuals, including those falling within Rule 6(1)(d), (e), (f) and (i).



855

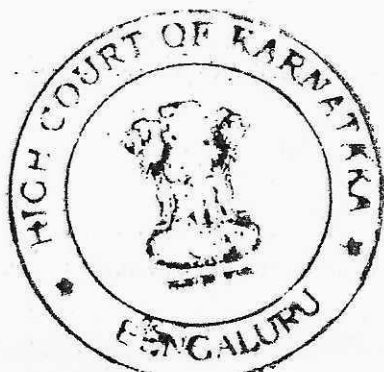
~~246~~ 208



10. Sections 19 and 20 of the Act empower the authorities to regulate, prohibit or suspend transmission of programmes which are not in conformity with the Programme Code or which affect public order, decency or the administration of justice.

11. Further, Section 79(3)(b) of the Information Technology Act, 2000 mandates that intermediaries, upon receiving actual knowledge of unlawful content, must expeditiously remove or disable access to such material. This obligation is reinforced by Rule 3(7)(b) of the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021, which requires removal within 36 hours of receipt of a court order or governmental notification.

12. The Trial Court, by order dated 10.09.2024, directed respondent No.4 to take action upon violation of the Programme Code. Further, the statement recorded on



36
9/11/24

- 12 -

NC: 2026:KHC:24468
WP No. 7473 of 2026



09.09.2024 reflects a clear undertaking that action would follow upon receipt of a complaint.

13. The petitioner having submitted a complaint dated 16.01.2026, the continued inaction on the part of the respondent authorities is ex facie arbitrary, contrary to statutory mandate, and violative of the doctrine of legitimate expectation.

14. The issue of "trial by media" has engaged judicial attention across jurisdictions. The Bombay High Court in **Nilesh Navalakha vs. Union of India**¹ cautioned against excessive media activism eroding the fairness of judicial proceedings. The Hon'ble Supreme Court in **In Re: Harijai Singh**² underscored that freedom of press is not absolute and must be tempered with responsibility. Further, in **P.C. Sen (in Re)**³, it was held

¹ 2021 SCC Online Bom 56

² (1996) 6 SCC 466

³ AIR 1970 SC 1821



80
9/11/23
230

- 13 -

NC: 2026:KHC:24468
WP No. 7473 of 2026



that any publication tending to interfere with the due course of justice constitutes contempt.

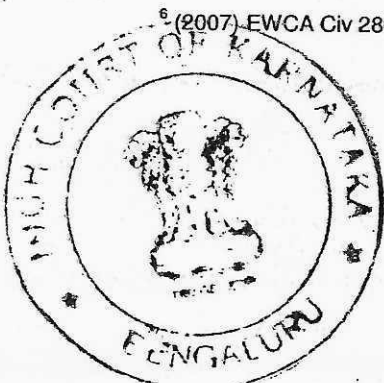
15. The dangers of prejudicial publicity have been succinctly articulated in global jurisprudence. In **Sheppard vs. Maxwell**⁴, the United States Supreme Court deprecated media excesses which transformed the judicial process into a "carnival atmosphere of justice", holding that massive and pervasive prejudicial publicity subverts due process. In **Nebraska Press Association vs. Stuart**⁵, it was emphasized that the right to a fair trial is the most fundamental of freedoms, requiring insulation from prejudicial pre-trial publicity.

16. The English position is equally stringent. In **Attorney-General vs. BBC**⁶, it was held that publications giving rise to a "real and substantial risk of prejudice" constitute contempt. The celebrated dictum in **R vs.**

⁴ 384 U.S. 333 (1966)

⁵ 427 U.S. 539 (1976)

⁶ (2007) EWCA Civ 280



219 (231)



*Sussex Justices, ex parte McCarthy*⁷, it was held that "justice must not only be done but must also be seen to be done" reinforces that perception of fairness is integral to adjudicatory legitimacy. Further, in *Alленet de Ribemont vs. France*⁸, it was held that public narratives imputing guilt prior to trial violate the presumption of innocence.

17. These authorities converge on a singular constitutional principle that media reportage cannot be permitted to supplant judicial determination or prejudice the course of justice.

18. The material placed on record, particularly the clippings produced, unfortunately depict a disturbing trend wherein the broadcast media has gone to the extent of recreating courtroom proceedings, with only the face of the presiding Judge being masked, while the faces of the accused and counsel are openly displayed. Such programmes are telecast on every date of hearing,

⁷ (1924) 1 KB 256

⁸ (1995) 20 EHRR 557



210 230

- 15 -

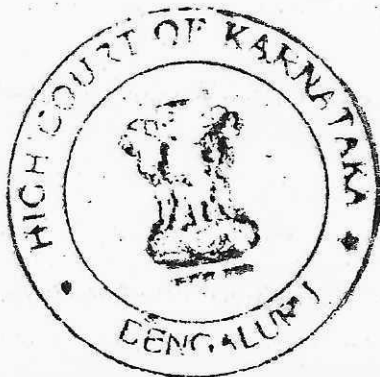
NC: 2026:KHC:24468
WP No. 7473 of 2026



thereby converting pending judicial proceedings into a form of public spectacle.

19. This Court cannot but observe that such conduct amounts to a calculated media-driven adjudication, fostering a parallel narrative and engendering prejudicial pre-trial publicity. The continued telecast of such content, in the teeth of subsisting injunction orders, reflects a blatant disregard for judicial authority and contributes to the creation of a "carnival atmosphere of justice", as noticed in ***Sheppard v. Maxwell*** (supra). By virtually staging courtroom scenes and projecting selective narratives, the media not only risks subverting due process but also erodes adjudicatory neutrality, impairing the petitioner's right to a fair trial.

20. Such broadcasts, which border on trial by headlines, cannot be countenanced in a system governed by the rule of law, particularly when they are aired in



251 (J3B)

- 16 -

NC: 2026:KHC:24468
WP No. 7473 of 2026



willful disobedience of binding injunctions and in a manner that tends to interfere with the administration of justice.

21. The continued broadcast in the teeth of civil court injunctions, orders of this Court and statutory prohibitions amounts to subversion of due process, erosion of adjudicatory neutrality, interference with administration of justice and prima facie contempt of court.

22. The material on record unmistakably discloses violations of Rule 6(1)(d), (e), (f) and (i) of the Programme Code under the Cable Television Networks (Regulation) Act, 1995. Such broadcasts are per se illegal and invite regulatory action under Sections 19 and 20 of the Act. The acts further attract the mischief of Section 2(c)(ii) and (iii) of the Contempt of Courts Act, 1971. The digital amplification of such content attracts Section 79(3)(b) of the Information Technology Act, 2000 read with Rule 3(7)(b) of the Intermediary Rules, 2021.



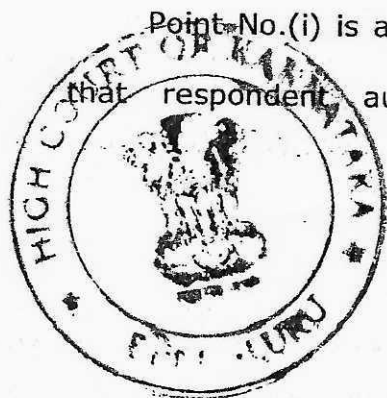


23. The complaint dated 16.01.2026 imposes a mandatory obligation on respondent authorities. The failure to act is arbitrary and unsustainable. The material on record discloses prima facie violations of statutory provisions and judicial orders. The ongoing media narrative poses a serious threat to the petitioner's right to a fair trial under Article 21.

24. Freedom of speech is a cherished constitutional value; however, when it degenerates into media-driven adjudication, it ceases to be a safeguard of democracy and becomes a threat to it. The press is a watchdog, but when it assumes the role of judge, jury and executioner, the rule of law stands imperiled. Courts cannot permit the course of justice to be overshadowed by the glare of studio lights.

25. In view of the foregoing reasons, the points formulated are answered accordingly:

Point No.(i) is answered in the **affirmative**, holding that respondent authorities are under a statutory

The seal of the High Court of Karnataka is circular. It features a central emblem of a lion standing on a pedestal, surrounded by a wreath. The text "HIGH COURT OF KARNATAKA" is written in a circular path around the emblem, and "ಬೆಂಗಳೂರು" (Bengaluru) is written at the bottom. The seal is stamped in black ink.



obligation to consider and act upon the complaint dated 16.01.2026 in accordance with the provisions of the Cable Television Networks (Regulation) Act, 1995, the Rules framed thereunder and the applicable provisions of the Information Technology Act, 2000 and allied Rules.

Point No.(ii) is answered in the **affirmative**, holding that the impugned media reportage and telecasts, prima facie, constitute violations of Rule 6 of the Programme Code under the Cable Television Networks Rules, 1994, apart from amounting to interference with administration of justice and violation of subsisting judicial orders.

Point No.(iii) is answered in the **affirmative**, holding that interference under Article 226 of the Constitution of India is warranted in the facts and circumstances of the case to ensure enforcement of statutory obligations, preservation of the petitioner's right to fair trial and maintenance of the purity of judicial process.



254 (28)

- 19 -

NC: 2026:KHC:24468
WP No. 7473 of 2026



26. For the foregoing reasons, this Court proceeds to pass the following:

ORDER

(i) The writ petition is **allowed in part**.

(ii) Respondent Nos.1 and 2 are directed to forthwith examine the impugned broadcasts and digital content relating to the petitioner and the subject crime and, upon being satisfied that the same are violative of Rule 6 of the Programme Code framed under the Cable Television Networks (Regulation) Act, 1995, take immediate action in accordance with Sections 19 and 20 of the Act by regulating, suspending, prohibiting or directing discontinuance of such telecast, broadcast, streaming or dissemination, pending enquiry and final consideration of the complaint.

(iii) Respondent Nos.1 and 2 shall consider the complaint dated 16.01.2026 (Annexure-A), conduct an enquiry into the alleged violations of the Programme Code and pass appropriate





orders under Sections 19 and 20 of the Act within a period of Six (6) weeks from the date of receipt of a copy of this order.

(iv) The respondents shall also examine the necessity of prohibition of broadcast, suspension/revocation of permissions or licences, imposition of penalties and initiation of such further statutory proceedings as are permissible in law.

(v) Respondents shall ensure strict compliance with Rule 6 of the Cable Television Networks Rules, 1994, Section 79(3)(b) of the Information Technology Act, 2000 and Rule 3(7)(b) of the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021.

(vi) Liberty is reserved to the petitioner to initiate appropriate proceedings under the Contempt of Courts Act, 1971, if so advised.



256 (22)

- 21 -



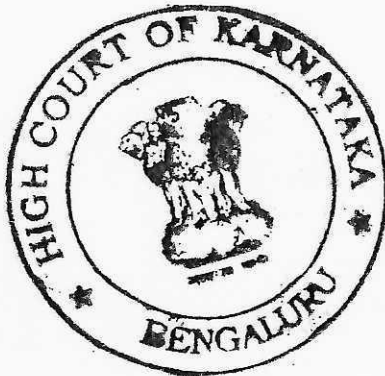
NC: 2026:KHC:24468
WP No. 7473 of 2026

(vii) Respondent Nos.1 and 2 shall file a compliance report before this Court within Twelve (12) weeks.

Sd/-
(SACHIN SHANKAR MAGADUM)
JUDGE

CA
List No.: 1 SI No.: 2

TRUE COPY
S.K. Vamanalini
Section Officer
High Court of Karnataka
Bengaluru - 560 001



- The date on which the application was made 30/4/26
- b) The date on which charges and additional Charges if any are called for 14/5/26
- c) The dated on which charges and additional Charges if any are deposited/Paid 1/6/26
- d) The date on which the copy is ready 2/6/26
- e) The date of notifying that the copy is ready For delivery 2/6/26
- f) The date on which the applicant is required to appear on or before 5/6/26
- g) The date on which the copy is delivered to the Applicant 4/6/26
- h) Examined by 4/6/26

98

NOTARY PUBLIC

STATE OF CALIFORNIA

NOTARY PUBLIC

NOTARY PUBLIC



This is the annexure P stated in the Affidavit of Vijay Lakshmi Das

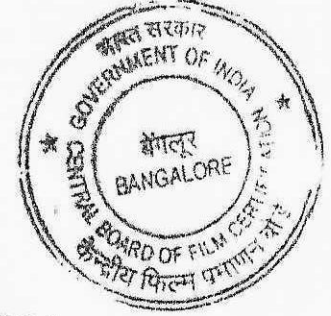

NOTARY

ANNEXURE - E

267 (239)



केन्द्रीय फिल्म प्रमाणन बोर्ड
CENTRAL BOARD OF FILM CERTIFICATION



49200

यह प्रमाण पत्र केवल थियेटर प्रदर्शन के लिए विधिमान्य है
THIS CERTIFICATE IS VALID FOR THEATRICAL RELEASE ONLY
भाग-I/Part-I

CA021612202500054 Crime

प्रमाणपत्र सं :

Certificate No: DIL/7/33/2026-BAN

फिल्म :

Film : BOSS (KANNADA WITH ENGLISH SUBTITLE) (Color) (2-D)

दिनांक :

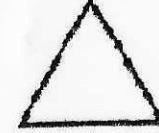
Dated : 17/03/2026

श्रेणी : अभिभावक मार्गदर्शन

Category : PARENTAL GUIDANCE

अवधि :

Duration : 122.14 min:sec



नीचे उल्लिखित परीक्षण समिति के सदस्यों द्वारा परीक्षण के उपरांत तथा इस परीक्षण समिति की अनुशंसाओं के आधार पर बोर्ड एतद् द्वारा यह प्रमाणित करता है कि पृष्ठभाग पर भाम-दो में सूचीबद्ध कंटेंट-छांट और संशोधनों के पश्चात यह फिल्म इस चेतावनी के पृष्ठोक्तों के साथ सार्वजनिक प्रदर्शन के लिए उपयुक्त है कि 16 वर्ष से कम आयु के किरी बालक को फिल्म देखने की अनुज्ञा दी जाए या नहीं, इस प्रश्न पर उस बालक के माता पिता या संरक्षक द्वारा विचार किया जाना चाहिए।

After examination of the film by the members of the Examining Committee mentioned below and on the recommendation of the said Examining Committee, the Board hereby certifies that the film is fit for public exhibition with an endorsement of caution that the question as to whether any child below the age of 16 years may be allowed to see the film should be considered by the parents or guardian of such child, and also subject to excision and modification listed in part II on the reverse :

- 1 PADMINI OAK L
- 2 ARCHANA RAO
- 3 NARAYANA SWAMI
- 4 RAGHAVENDRA H S
- 5 YASHWANT SHEHNAI (E.O.)

यह भी प्रमाणित किया जाता है कि बोर्ड द्वारा अधिरोपित कंटेंट-छांट और संशोधनों को वास्तव में कार्यान्वित किया गया है।
Further certified that the excisions and modifications imposed by the Board have actually been carried out.

आवेदक का नाम

Name of Applicant : TANUSH S- BANGALORE URBAN(SIRI PRODUCTIONS)

निर्माता का नाम

Name of Producer : TANUSH S- BANGALORE URBAN(SIRI PRODUCTIONS)

अध्यक्ष

For Chairman

Digitally signed by YASHWANT SHEHNAI
Date: 2026.03.17 17:15:29 IST

(YASHWANT SHEHNAI)

Regional Officer

CBFC, BANGALORE



258 (940)

Film No : CA021612202500054

Film Name : BOSS (KANNADA WITH ENGLISH SUBTITLE) (Color) (2-D)

Applied Running Time : 123.00 MM.SS

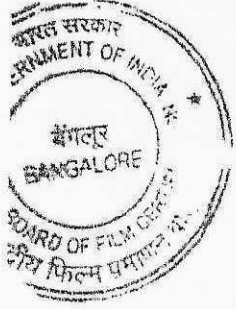
U/A (Unrestricted Public Exhibition-But With Parental Guidance) Cert No. DIL/7/33/2026-BAN Dated 17/03/2026

Insertions / Excisions/ Modifications carried out by the applicant to comply with the law in force

Cut No.	Description	Deleted	Replaced
1	Increase screen time of disclaimer 'fictitious nature of story and characters...(15 to 20 secs)-INCREASED	00.00	00.07
2	12:59 (Deepak), 46:46, (Nandish), wherever applicable, change character names - CHANGED TO DEEPESH AND SANDISH	00.00	00.00
3	Insert TCR and submit DVD (with Penalty) - SUBMITTED	00.02	00.00
4	Remove 'Hints to masturbation' frame - 34:46 - REMOVED	00.00	00.00
5	Reduce blurred Online videos by 50 % - 35:24 - REPLACED	00.00	00.00
6	Reduce Ogling at Sheela's profile by 1/3rd - 38:10 - REPLACED	00.00	00.00
7	Remove 'Hand to Zipper' frame (in Yella kalsthini...) - REPLACED	00.00	00.00
8	Insert subtitle properly - 4:00, 1:47:00 - INSERTED	00.00	00.00
9	Mute 'Kachada kaamuka' - 1:27:43 - MUTED	00.00	00.00
10	Insert kannada subtitle for malayalam dialogues - INSERTED	00.00	00.00
11	Remove 'Bastards' - 1:11:32 - REMOVED	00.51	00.00
12	Reduce/Replace custodial torture by 50% - 9:56 to 11:17, 29:43 to 31:11 - REDUCED		
Total :		00.53	00.07

ON LINE
VIDEO

Digitally signed by YASHWANT
SHEHNAI
Date: 2026.03.17 17:15:54 IST



259 (240)

भाग-2/PART-II

कांट-छांट और उपान्तरों की विशिष्टियां/Particulars of excisions and modifications



Total Deletions at the Time of Examination : 00.53 MM.SS
Total Replacement at the time of Examination : 00.07 MM.SS

Actual Duration of the film after the aforesaid deletions and replacements will be 122.14 MM.SS in 0. cassette(s).

Digitally signed by YASHWANT SHEHNAI
Date: 2026.03.17 17:16:14 IST

(YASHWANT SHEHNAI)

Regional Officer

CBFC, BANGALORE

IN THE COURT OF THE HON'BLE PRINCIPAL CITY CIVIL
AND SESSIONS JUDGE, BANGALORE

O.S. No. 2151/2026

BETWEEN:

SRI. DARSHAN SRINIVAS & Anr.

.... PLAINTIFFS

AND:

SIRI PRODUCTIONS & Ors

..... DEFENDANTS

INDEX

Sl. No.	Particulars	Page No.
1.	Brief Facts	1
2.	Striking Similarities between the Film "BOSS" and Plaintiff's Life / Sub Judice Case	2
	(Table of 13 glaring similarities) & The Admission of the Defendant No. 2 in the Press Conference held by Defendant No.11.	2-4
3.	Additional Ground: Wilful Violation of Existing Protective Judicial Orders	5
	3.1 Four subsisting protective orders passed by this Court and the High Court of Karnataka	5
	3.2 Strong observations of the Hon'ble High Court in W.P. No.7473/2025 (2026)	5
	3.3 Contempt of prior judicial orders	6
4.	Strong Prima Facie Case - Prejudice to Fair Trial & Contempt of Court	6
	4.1 Prejudicial effect on fair administration of justice	6
	4.2 Direct application of <i>Mushtaq Moosa Tarani</i> (Black Friday) case	6

25/ (243)

Sl. No.	Particulars	Page No.
5.	Cinema Requires Stricter Scrutiny – <i>K.A. Abbas v. Union of India</i> (1971) 2 SCR 446	7
6.	Power of Courts to Postpone Publication	7
	6.1 <i>Sahara India Real Estate Corpn. Ltd. v. SEBI</i> (2012) 10 SCC 603 (Constitution Bench)	7
	6.2 Deprecating "trial by media" – <i>M.P. Lohia</i> (2005) & <i>Sidhartha Vashisht</i> (2010)	7
7.	Personality Rights & Privacy	8
	<i>R.N. Rajagopal</i> (1994), <i>Anil Kapoor</i> (2023), <i>Rajinikanth</i> (2015) cases	8
8.	Balance of Convenience and Irreparable Injury	8
	<i>Bloomberg Television Production Services India Pvt. Ltd. v. Zee Entertainment</i> (2024)	8
9.	Detailed Elaboration of Case Laws Relied Upon	9
	9.1 <i>Mushtaq Moosa Tarani v. Government of India</i> (2005 SCC OnLine Bom 385) – "Black Friday" Case	9
	9.2 <i>K.A. Abbas v. Union of India</i> (1971) 2 SCR 446	10
	9.3 <i>Sahara India Real Estate Corpn. Ltd. v. SEBI</i> (2012) 10 SCC 603	10
	9.4 <i>M.P. Lohia v. State of West Bengal</i> (2005) 2 SCC 686 & <i>Sidhartha Vashisht</i> (2010) 6 SCC 1	10
	9.5 <i>R.N. Rajagopal v. State of Tamil Nadu</i> (1994) 6 SCC 632	10
	9.6 <i>Anil Kapoor v. Simply Life India</i> (2023, Delhi HC) & <i>Shivaji Rao Gaikwad</i> (2015, Madras HC)	11
	9.7 <i>Bloomberg Television Production Services India Pvt. Ltd. v. Zee Entertainment</i> (2024)	11
10.	Prayer	11

1 ~~262~~ (244)

**IN THE COURT OF THE HON'BLE PRINCIPAL CITY CIVIL
AND SESSIONS JUDGE, BANGALORE**

O.S. No. 2151/2026

BETWEEN:

SRI. DARSHAN SRINIVAS & Anr.

.... PLAINTIFFS

AND:

SIRI PRODUCTIONS & Ors

..... DEFENDANTS

WRITTEN ARGUMENTS

1. BRIEF FACTS

1.1 The Plaintiffs have filed the above suit seeking perpetual prohibitory injunction restraining the Defendants from producing, promoting, certifying, releasing, exhibiting or dealing in any manner with the Kannada feature film titled "BOSS" (produced by Defendant No.1 – Siri Productions, directed by Defendant No.2 – V. Lava, starring Defendant No.3 – Tanush Shivanna).

1.2 The teaser released on 09.03.2026, the press meet, promotional materials and the plot summary submitted to CBFC explicitly declare the film as "Inspired by true events" and contain multiple striking and unmistakable similarities to the

private life of Plaintiff No.1 and the facts of the ongoing sub-judice criminal trial in C.C. No.1319/2024 (arising out of Crime No.0250/2024).

1.3 On 27.03.2026, this Hon'ble Court was pleased to grant ex-parte ad-interim temporary injunction under Order XXXIX Rules 1 & 2 r/w Section 151 CPC after recording a prima facie case of violation of the Plaintiffs' right to privacy, personality rights and right to fair trial under Article 21 of the Constitution. The Defendants have now filed the present IA seeking vacation of the said order.

2. STRIKING SIMILARITIES BETWEEN THE FILM "BOSS" AND PLAINTIFF'S LIFE / SUB JUDICE CASE

The similarities are not coincidental but deliberate. They are tabulated below for ready reference of this Hon'ble Court:

Sl. No.	Element in Film "BOSS" (Teaser / Promotional Materials / Plot Summary submitted to CBFC)	Corresponding Fact in Plaintiff No.1's Life / Criminal Case (Crime No.0250/2024 / C.C. No.1319/2024)
1	Title of the film: "BOSS"	Plaintiff No.1 is popularly and publicly known as "D Boss" / "Challenging Star Darshan"

2	Protagonist / lead character repeatedly referred to as "Boss" by fans	Plaintiff No.1's fans and the public refer to him as "D Boss" / "Boss"
3	Celebrity figure involved in the killing of a fan/follower who sent obscene messages/calls to the protagonist's wife/girlfriend	Deceased Renukaswamy was a fan who allegedly sent objectionable messages to Plaintiff No.1's friend <u>FRIEND</u> .
4	Victim pleads "don't kill me, I have a pregnant wife at home and aged parents"	Directly mirrors the allegations made in the FIR and charge sheet
5	Body of the victim found next to a drainage pipeline	As per the prosecution case in Crime No.0250/2024
6	Arrest and police investigation of the celebrity protagonist	Plaintiff No.1 was arrested in June 2024 and is facing day-to-day trial
7	Entire story set in Bengaluru	The crime and the ongoing trial are entirely Bengaluru-centric
8	The protagonist's wife name Lakshmi	The Plaintiff No.2's name is Vijayalakshmi
9	Explicit opening disclaimer in the very first frame: "Inspired by true events"	Clearly links the film to the real life events of Plaintiff No.1 and the pending trial
10	Two prominent female leads in the story	Refers to Plaintiff No.2 (wife) and family circumstances

11	Plot summary submitted to CBFC describes the protagonist as a "famous cricket player" who beats up a man sending obscene messages	This is a deliberate misrepresentation; the teaser and promotions show a celebrity figure (no cricket connection)
12	Victim's name is Renuka Swami	Victim's name is Shiva Swami
13	Victim's body was found in Palya	Victim's body was found in Kamakshi Palya

KEY ADMISSION BY THE DEFENDANT NO. 2 IN THE PRESS CONFERENCE HELD BY DEFENDANT NO. 11

These glaring similarities, coupled with the director's public admissions, establish that the film is a dramatised re-enactment of the sub-judice matter.

3. ADDITIONAL GROUND: WILFUL VIOLATION OF EXISTING PROTECTIVE JUDICIAL ORDERS

3.1 The production, promotion and attempt to obtain CBFC certification of the film "BOSS" is in clear and wilful violation of four protective orders already passed by this Hon'ble Court and the Hon'ble High Court of Karnataka, which are still subsisting:

- O.S. No.4267/2024 dated 19.06.2024 – restraining unauthenticated/defamatory content touching the

personal/family life or investigation in Crime No.0250/2024.

- O.S. No.6082/2024 dated 27.08.2024 - ex-parte ad-interim injunction restraining airing/printing/publishing statements on investigation, charge sheet, FSL, confessions, debates or predictions on merits.
- O.S. No.7875/2024 dated 11.11.2024 - ad-interim injunction restraining unverified statements lowering the image of Plaintiff No.1 in print/TV/internet/social media.
- W.P. No.24836/2024 (High Court of Karnataka) dated 10.09.2024 - restraining dissemination of charge sheet/confidential information and directing the Ministry of Information & Broadcasting to act on violations of Cable Television Networks Rules, 1994.

3.2 Further, in W.P. No.7473/2025 (Darshan Srinivas v. Union of India & Ors.), the Hon'ble High Court of Karnataka in 2026 made strong observations directing the Ministry of Information & Broadcasting and CBFC to ensure that no content violating the above protective orders or prejudicing the fair trial is permitted to be exhibited or certified.

3.3 The Defendants' actions therefore not only violate the Plaintiffs' fundamental rights under Article 21 but also constitute contempt of prior judicial orders and render them liable for appropriate proceedings.

4. STRONG PRIMA FACIE CASE – PREJUDICE TO FAIR TRIAL & CONTEMPT OF COURT

4.1 The release of the film would have a “prejudicial effect on the fair administration of justice” and tends to interfere with the due course of judicial proceedings, thereby amounting to criminal contempt under Section 2(c)(ii) & (iii) of the Contempt of Courts Act, 1971.

4.2 This is squarely covered by the Division Bench judgment of the Bombay High Court in *Mushtaq Moosa Tarani v. Government of India* (2005 SCC OnLine Bom 385) (“Black Friday” case). In that matter, the Court granted an interim injunction restraining the release of a film based on a pending sub-judice TADA trial (even after CBFC certification) and held:

“The film is based on the real events which are the subject matter of the pending trial... It is likely to have a prejudicial effect on the fair administration of justice. It prejudices and, in any case, tends to interfere with the due course of judicial proceeding. It also thereby interferes and, in any case, tends to interfere with the administration of justice... amounting to criminal contempt under Section 2(c)(ii) & (iii) of the Contempt of Courts Act.”

4.3 The Court further held that cinema is a powerful medium that stirs emotions more deeply than any other form of expression and that even a trained judicial mind cannot be presumed to be completely immune from its influence.

5. CINEMA REQUIRES STRICTER SCRUTINY

In *K.A. Abbas v. Union of India* (1971) 2 SCR 446, the Supreme Court held that motion pictures must be treated on a different footing from other forms of art because of their instant appeal, versatility, realism and coordination of visual and aural senses.

6. POWER OF COURTS TO POSTPONE PUBLICATION

In *Sahara India Real Estate Corpn. Ltd. v. SEBI* (2012) 10 SCC 603 (Constitution Bench), the Supreme Court affirmed the power of courts to order postponement of publication (including films) where there is a real and substantial risk of prejudice to fair trial under Article 21.

The Court has consistently deprecated "trial by media" in sub-judice matters in *M.P. Lohia v. State of West Bengal* (2005) 2 SCC 686 and *Sidhartha Vashisht @ Manu Sharma v. State (NCT of Delhi)* (2010) 6 SCC 1.

7. PERSONALITY RIGHTS & PRIVACY

The film amounts to misappropriation of personality rights and invasion of privacy protected under Article 21 (*R.N. Rajagopal v. State of Tamil Nadu*, (1994) 6 SCC 632; *Anil Kapoor v. Simply Life India*, 2023 Delhi HC; *Shivaji Rao Gaikwad v. Varsha Productions*, 2015 Madras HC).

8. BALANCE OF CONVENIENCE AND IRREPARABLE INJURY

The Plaintiffs have a strong prima facie case. The balance of convenience lies decisively in their favour and they will suffer irreparable injury if the injunction is vacated (*Bloomberg Television Production Services India Pvt. Ltd. v. Zee Entertainment Enterprises Ltd.*, 2024 SCC OnLine SC 426).

9. DETAILED ELABORATION OF CASE LAWS RELIED UPON

9.1 *Mushtaq Moosa Tarani v. Government of India* (2005 SCC OnLine Bom 385) (Division Bench, Bombay High Court) – “Black Friday” Case Facts: An undertrial accused in the 1993 Bombay Blast TADA case sought to restrain the release of the film Black Friday, which was admittedly based on real events of the pending trial and had received CBFC certification with a disclaimer. Ratio: The Court granted an interim injunction restraining exhibition, screening and public release of the film until the judgment in the pending criminal trial. AND also observed that The film therein is based on the real events which are the subject matter of the pending trial... It is likely to have a prejudicial effect on the fair administration of justice. It prejudices and, in any case, tends to interfere with the due course of judicial proceeding. It also thereby interferes and, in any case, tends to interfere with the administration of justice... amounting to criminal contempt under Section 2(c)(ii) & (iii) of the Contempt of Courts Act.

252

9

~~270~~ ~~200~~

The Court emphasised that cinema is a powerful medium capable of stirring emotions far more deeply than news reports, and even a trained judicial mind cannot be presumed completely immune from its influence.

Application to present case: The facts are on all fours. The film "BOSS" carries an explicit "Inspired by true events" disclaimer, uses the moniker "Boss" (synonymous with Plaintiff No.1), and contains striking factual parallels to the ongoing day-to-day trial in C.C. No.1319/2024. The ratio squarely applies and justifies continuation of the injunction dated 27.03.2026 despite CBFC certification.

9.2 K.A. Abbas v. Union of India (1971) 2 SCR 446 (Supreme Court) Ratio: Motion pictures require stricter scrutiny than other forms of expression because of their "instant appeal, versatility, realism and coordination of the visual and aural senses." Pre-censorship under Section 5B of the Cinematograph Act, 1952 is constitutionally valid. Application: Cinema has a far greater potential to prejudice a sub-judice trial than print or television. CBFC certification does not preclude judicial restraint when Article 21 rights (fair trial and privacy) are at stake.

9.3 Sahara India Real Estate Corpn. Ltd. v. SEBI (2012) 10 SCC 603 (Constitution Bench) Ratio: Courts have inherent powers to order postponement of publication (including films) where there is a real and substantial risk of prejudice to the fairness of a pending trial. Such restraint is a reasonable restriction under Article 19(2) to protect Article 21 rights. Application: The

253

10

~~241~~ 223

ongoing day-to-day trial in C.C. No.1319/2024 faces real and imminent prejudice from the mass-reaching medium of cinema. This Court is empowered to continue the injunction.

9.4 M.P. Lohia v. State of West Bengal (2005) 2 SCC 686 & Sidhartha Vashisht @ Manu Sharma v. State (NCT of Delhi) (2010) 6 SCC 1 Ratio: The Supreme Court strongly deprecated "trial by media" in sub-judice matters. One-sided or dramatised publications that narrate the prosecution's version while the trial is pending interfere with the administration of justice and violate Article 21. Application: A full-length feature film with an "Inspired by true events" disclaimer is far more prejudicial than news reports and squarely falls within the prohibited category.

9.5 R.N. Rajagopal v. State of Tamil Nadu (1994) 6 SCC 632 Ratio: Right to privacy under Article 21 includes the right to be let alone. No one can publish or commercially exploit the private life or persona of a person without consent, especially when it causes reputational harm. Application: The film exploits Plaintiff No.1's public persona "D Boss", family life and the pending criminal case without consent.

9.6 Anil Kapoor v. Simply Life India & Ors. (2023, Delhi High Court) & Shivaji Rao Gaikwad (Rajinikanth) v. Varsha Productions (2015, Madras High Court) Ratio: Courts have granted ex-parte injunctions protecting a celebrity's personality rights (name, image, nickname, distinctive persona) from unauthorised commercial exploitation. Application: The title "BOSS" and repeated reference to the lead character as "Boss"

254 11

272

20#

deliberately capitalises on Plaintiff No.1's well-known moniker for commercial gain.

9.7 Bloomberg Television Production Services India Pvt. Ltd. v. Zee Entertainment Enterprises Ltd. (2024 SCC OnLine SC 426)

Ratio: Reiterated the classic three-fold test (prima facie case, balance of convenience, irreparable injury) for temporary injunctions, even in media-related suits. Fundamental rights under Article 21 must be given due weight. Application: All three ingredients are fully satisfied in the present case.

10 PRAYER

In view of the foregoing submissions, the glaring similarities, the wilful violation of multiple protective orders, and the authoritative precedents cited above, it is most respectfully prayed that this Hon'ble Court may be pleased to:

Allow the IA under Order XXXIX Rule 1 & 2 of CPC and continue the interim Order dated 27.02.2026 in the interest of justice and equity.

Place: Bengaluru

Date:



ADVOCATE FOR PLAINTIFFS

255

~~273~~ ~~285~~

ANNEXURE - 61

**IN THE COURT OF HON'BLE ADDITIONAL CITY CIVIL AND
SESSIONS JUDGE AT BENGALURU**

O.S. No. 2151/2026

BETWEEN:

SRI. DARSHAN SRINIVAS

AND ANOTHER

PLAINTIFFS

AND:

SIRI PRODUCTIONS

AND OTHERS

DEFENDANTS

**WRITTEN ARGUMENTS OF DEFENDANT No. 1 AND 2 TO THE I.A.
NO. 1 FILED UNDER ORDER 39 RULE 1 AND 2 OF CPC**

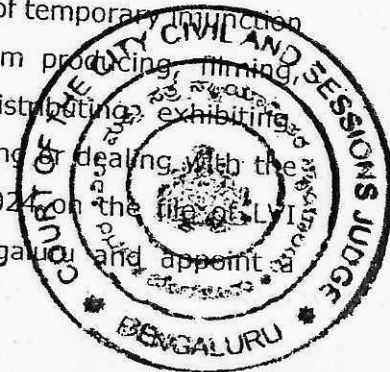
23/4/26

The Defendant No. 1 and 2 humbly submits as follows:

*Copy received
Per [Signature]
Adv for Plaintiff.*

1. It is submitted that the Plaintiffs herein have filed the present suit seeking judgment and declaration an injunction the Defendants herein in respect of making of the movie BOSS, approval by censor board and its release or exhibiting which is produced and directed by the Defendant No. 1 and 2 herein.

2. The Plaintiffs herein have also filed an I.A. No. 1 under order 39 Rule 1 and 2 of CPC seeking interim order of temporary injunction restraining the Defendant No. 1 and 2 from producing, filming, editing, promoting, marketing, releasing, distributing, exhibiting, telecasting, streaming, selling licensing, leasing or dealing with the movie in question pending C.C. No. 1319/2024 on the file of L.I. Additional City Civil & Sessions Judge, Bengaluru and appoint



256

27H

228

Receiver for enforcement of the present order in the interests of justice and equity.

**I. CONTENTIONS OF THE PLAINTIFFS IN RESPECT OF I.A. NO. 1
AS PER PLAINT AND I.A. 1**

3. The Plaintiff No.1 is a movie actor, producer and is known for playing as lead in numerous successful Kannada movies and the Plaintiff No.2 is the wife of Plaintiff No.1 is a matter of record.

4. The Plaintiff No.1 has established his own identity, fame and name in the society, through his dedication and hard work and is recognized as one of the prominent members of the South Indian Cinema Industry is many other artist also gained name in South Indian Industry by their handwork.

5. The Plaintiff No. 1 has attained his stardom and has often been referred to as to as 'Challenging Star Darshan', Boss & 'D Boss' etc., by his fans and admirers.

6. The movie 'BOSS' produced and directed by Defendant No. 1 and 2 herein is based on the life of the Plaintiffs including the allegations of crime for which Plaintiff No.1 is currently undergoing trial and is in judicial custody vide Special C.C. N. 1319/2024 pending on the file of Hon'ble LVI Additional Civil & Sessions Judge, Bengaluru.

7. Subsequently, the promotional materials such as the posters, advertisements on television news and articles of a movie, teaser produced by the Defendant No.1 were releasing one after another and these promotional material have been fueling public speculation that the movie was based on the crime that the Plaintiff No.1 is currently under trial for and that the movie is based on the Plaintiff No.1 himself.



257

275

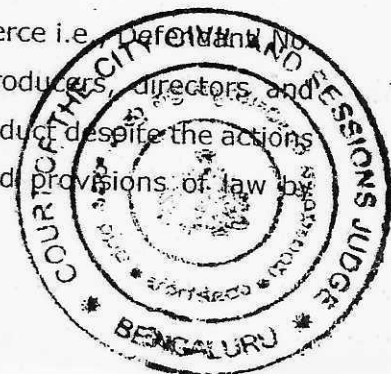
~~277~~

8. The averments made at para 8 that on 09.03.2026 the Defendant No.1 released the teaser of the movie and after the release of the teaser, the Defendant No.2 Director and Defendant No.1 Tanush S, main lead and producer of the movie conducted a press meet with various Journalists is on 9th March 2026 and both the teaser and the press conference have been uploaded on various channels on Facebook, Instagram, Twitter and YouTube i.e., Defendant No.4 to 6 are KFCC, Meta Platform (Facebook and Instagram), X-Corp is unknown person twitter account.

9. On plain viewing of the teaser of the said movie it can be seen that the premise of the movie is referring to killing of a person, the audio of a person requesting not to kill him as he has a pregnant wife at home and aged parents, the body being found next to a drainage pipeline, arrest of a celebrity, investigation regarding the killings, the movie having two female leads, and the fans of the lead actor in the movie referring to him as "boss", the incident in the movie occurring in Bengaluru, etc., all of which are similar to the incidents that have occurred as per the allegations made against the Plaintiffs and in the alleged charge sheet which is now pending before the Hon'ble Sessions Court Bangalore and the movie portraying all these incidents and showing them in the very first promotional video itself is not mere coincidence but a strategic plan to make money using the Plaintiffs' private life and reputation as a public personality.

10. There are a lot or misinformation, rumors and statements that are being made to tarnish the image of the Plaintiffs and his family members, in all likelihood, a-movie based on these sources would not only impact the on-going trial before the Hon'ble Sessions Court S.C No.1319 of 2024/but will impact the image and reputation of the Plaintiffs and his family members.

11. The Karnataka Film Chamber of Commerce i.e. Defendant No. 4; which is the apex body representing producers, directors and exhibitors has failed to enforce its code of conduct despite the actions of Defendant No. 1 violating the established provisions of law by



276 (258)

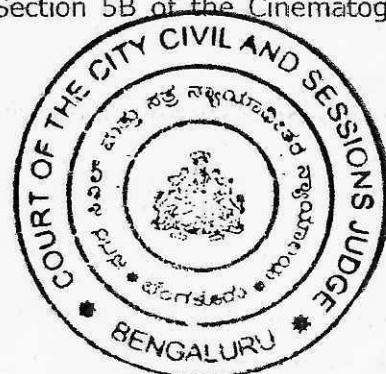
making things regarding the case currently under trial and violation of privacy of one of its own members.

12. Various suits and Writ Petition are filed by the Plaintiffs herein and the Hon'ble Courts were pleased to provide protection to the reputation and privacy of the Plaintiffs and his family members, by directing the media and any other third party from publishing, telecasting, distributing any unverified news, statements, claims etc., which may tarnish the image of the Plaintiff.

13. The movie "Boss" not only violates the privacy of the Plaintiffs No.1 but also of his wife and other family members and in all likelihood have impact on the on-going trial before the Sessions Court in S.C.No. 1319/2024.

14. Under the guise of mere denial that the movie is not related to the Plaintiffs or the alleged crime, the Defendant No.1 and Defendant No.2 have violated the fundamental right to Privacy and personal liberty granted under Article of the Constitution of India and the Defendant No. 3 organization has enabled the violation by providing certification.

15. Grant of the certificate by Defendant No.3 is in complete disregard of the Plaintiffs' statutory notice, the prior protective orders passed by this Hon'ble Court and the Hon'ble High Court of Karnataka (produced as Document No.5), and the fact that the film is based on the private life of the Plaintiffs and the specific incidents forming the subject-matter of the ongoing trial in S.C. No.1319/2024 which is now pending before the Sessions Court, Bangalore and the certification has been granted without considering the gross violation of the Plaintiffs' fundamental rights under Article 21 of the Constitution of India, the principles of decency, morality, public order, and the prohibition against interference with pending judicial proceedings as mandated under Section 5B of the Cinematograph Act, 1952.



277 (289)

16. In the event the movie "BOSS" is permitted to be exhibited in cinema halls, multiplexes or theatres, it would cause immediate, widespread and irreparable harm to the Plaintiffs' reputation, privacy and right to fair on-going trial and the plaintiffs are therefore entitled to a decree of permanent prohibitory Injunction against all cinema halls, exhibitors and Theatre owners' from screening or exhibiting the said movie, so prevent any public exhibition pending final decision in the suit.

**II. CONTENTIONS OF THE DEFENDANT NO. 1 TO 2 TO THE IA. 1
FILED BY THE PLAINTIFFS**

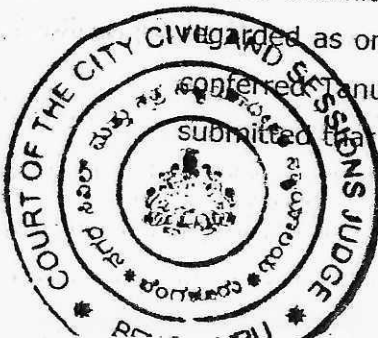
17. The Defendant No. 1 is the Producer of the film in question and Defendant No.2 is the Director of the film.

18. The Defendant No. 1 and 2 are the only persons directly involved in the creation, production, and exhibition of the film in question and are the only necessary and proper parties to the suit.

19. It is submitted that the under the banner of SIRI PRODUCTIONS the Defendant No. 1 has directed a Kannada Movie namely "BOSS" which is produced by Sri. Tanush. It is further submitted that the said Producer Tanush has performed the lead role in the said movie.

20. It is further the submitted that movie 'Boss' is completed and the defendant No. 1 and 2 herein have obtained necessary Certificate bearing No. DIL/7/33/2026-BAN dated 17.03.2026 issued by Defendant No.3 (Central Board of Film Certification) in favour of the movie "BOSS" under the provisions of the Cinematograph Act, 1952.

21. The Hero in the movie is a Cricketer by profession. The said Hero is named as "Tanush". Tanush plays for BCB Cricket Club. It is further submitted that Tanush due to his cricketing skills is widely regarded as one of the greatest Cricketer and due to this, the fans conferred Tanush a title namely "Boss" in the movie. It is further submitted that Tanush is also shown in the movie as a humble man



and generous person who believe in giving respects to everyone around him.

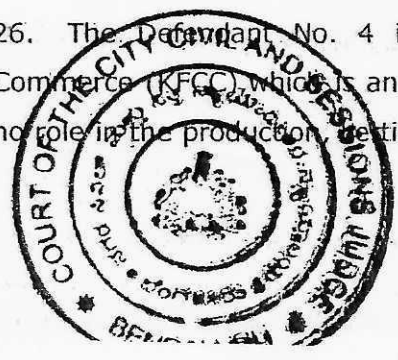
22. It is further relevant to state that the proposed movie 'Boss' is not yet released in Movie-Theatres or any other Platform like Netflix, Amazon etc., It is further relevant to state that the proposed movie 'Boss' is not at all available in the Public domain. Under these circumstances, the Plaintiffs herein have filed the present suit and I.A. No. 1 with their wild guessing/imaginings and have formed a self-opinion that the proposed movie 'Boss' is filmed based on the events occurred in the Charge Sheet vide Spl. C. C. No. 1319/2024 pending on the file of this Hon'ble Court which is false.

23. It is submitted that movie in question does not contain any name, photographs, family details, profession of Plaintiff No. 1, or any other particulars, which may lead to the disclosure of alleged similarities of incident which is subject matter of Spl. C. C. No. 1319/2024 as alleged by the Plaintiffs. Therefore, none of the provisions of Cinematography Act have not been violated by the Defendant No. 1 and 2 in any manner whatsoever.

24. It is further submitted that the defendant No. 1 and 2 also started promoting the said movie on social media platforms and electronic media in accordance with law.

25. It is submitted that the Defendant No. 3 is the Central Board of Film Certification (CBFC), which has already issued certification to the film on 17.03.2026 under the Cinematograph Act and the relevant rules, which clearly indicates that the film has been examined by the statutory authority and found to be fit for public exhibition without any objectionable or unlawful content, and the certification process being a statutory, quasi-judicial exercise, courts are expected to respect the expert opinion of the Board and not to interfere lightly with a certified film except in cases of clear violation of law or material injury to public interest.

26. The Defendant No. 4 is the Karnataka Film Chamber of Commerce (KFCC), which is an industry-related association and has no role in the production, certification, or exhibition of the film, and



279 (261)

neither Defendant No. 1 nor Defendant No. 2 has entered into any business, transaction, or title-registration with Defendant No. 4 in relation to the film, the film has not been registered and no banner or title has been recorded with this body, and the inclusion of Defendant No. 4 in the array of parties is therefore entirely incorrect and mal-fide, as it bears no legal or practical connection with the present suit, and it is submitted that Defendant No. 4 is an unnecessary and improper party and is liable to be struck off from the array of parties under Order 1 Rule 10 CPC.

FOLLOWING POINTS ARISE FOR CONSIDERATION

I. PLAINT IS LIABLE TO BE RETURNED FOR PROPER PRESENTATION

- It is submitted that both Plaintiff No.1 and Plaintiff No.2 are required to sign the plaint as per Order VI Rule 14 CPC and Order III CPC. In the present case, the plaint is signed only by Plaintiff No. 2 and the Plaintiff No. 1 has not at all signed the plaint. The reason assigned to this effect by the Plaintiff No. 2 is that the Plaintiff No.1 is in judicial custody and therefore, his signatures are to be exempted. This is absolutely unteable and unknown to the procedural laws of the Country i.e., CPC and Civil Rules of Practice.
- In the absence of written authorisation or necessary interlocutory application to that effect, the Plaint is liable to be returned for proper presentation. It is more shocking that the Scrutiny branch has not at all raised any "office objections" in this regard.
- Hence, the plaint is defective and not maintainable and is liable to be returned for proper presentation.

II. COMPLIANCE OF TEMPORARY INJUNCTION NOT DONE AS ORDERED BY THIS HONBLE COURT

- It is well settled practice and law that the compliance affidavit towards complying the ad interim Temporary Injunction orders



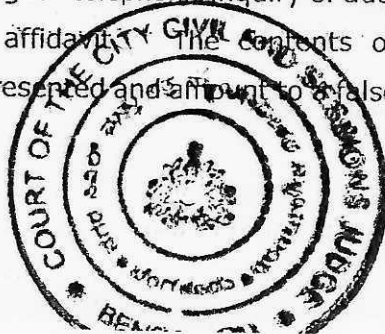
269

280

232

mandatorily the party has sign an Affidavit reporting the compliance of the T.I. order.

- In the present case, one Pratham N. Advocate has filed an Affidavit towards alleged compliance of ad-interim order of Temporary Injunction granted by this Hon'ble Court.
- It is further submitted that there is no explicit or written authorisation from the Plaintiff No. 1 and 2 in favour of said Pratham N. Advocate. Hence, only on this ground the ad-interim order is liable to be vacated.
- It is further submitted that in said compliance affidavit dated 28.03.2026 filed by the Plaintiffs' counsel, it has been falsely stated therein that the Counsel spoke to Defendants No. 1 and 2 on telephone and asked for their address and they did not furnish it.
- Thereafter the Counsel of the Plaintiffs served copy of the ad-interim order, pleadings and documents to the Defendants No. 1 & 2 through WhatsApp. This practice is wholly incorrect and improper.
- It is hereby submitted that Defendants No. 1 & 2 never refused to provide their addresses and on the contrary, the ad-interim order of temporary injunction came to their notice through media reports and press coverage.
- Some preliminary documents have, in fact, been sent by the Plaintiffs' counsel through WhatsApp after a gap of several days, but the files were in a wrong format / failed to open, making proper inspection impossible.
- The Defendant No. 1 has, on separate occasions, requested that documents be sent through proper mode (hard copy / post), but the Plaintiffs' counsel has not complied and has still attempted to claim "service" through WhatsApp.
- The alleged "telephonic inquiry of address" never took place as stated in the affidavit. The contents of the compliance affidavit are misrepresented and amount to a false oath. In view of the above, the



281 (253) (263)

Plaintiffs' counsel has not only failed to comply with the Court's order, but has also filed a false compliance affidavit, which is, on the face of it, contemptuous and liable to be treated as misconduct. Abuse of process, misleading the Court, and ex parte order by fraud.

- The Plaintiffs have obtained the ex parte interim stay order by Suppressing that there is no real-life nexus between the film and Plaintiff No. 1. Suppressing that the Plaintiff No. 1 is only a producer-banner concerned with other projects, and not the "subject" of the film. Suppressing that Defendants No. 4 to 12 have no connection with the film and have been arrayed merely to create delay and protract the proceedings.
- The notice of the stay order has been highlighted in numerous media reports and press statements, which has already caused irreparable damage to the commercial prospects of the film. The film was scheduled for theatrical release on 24.04.2026, but on account of the stay, the date has been deferred and distributor-exhibitor agreements are being cancelled or re-negotiated at heavy loss.
- The Defendant No. 1 (Producer-Banner) has already suffered a loss exceeding ₹60,00,000/-, and continues to suffer escalating financial loss, as theatrical booking windows shrink, sponsorship and digital-platform deals collapse, and public interest erodes.
- The Plaintiffs have thus intentionally sought and obtained the ex parte stay with unclean hands, knowing fully well that the film is fictional and that their own title "Boss" is not exclusive or protectable in law. In such circumstances, the continuation of ad-interim order of temporary injunction is operating only to the Plaintiffs' advantage and on the other hand, the defendant NO. 1 and 2 are suffering enormously.
- The Plaintiffs have deliberately suppressed material facts and furnished incorrect addresses, and notices were sent to unrelated parties. It is settled law that any order obtained by fraud or suppression is a nullity.

• Case Law



202
234
264

- a) S.P. Chengalvaraya Naidu v. Jagannath*, (1994) 1 SCC 1
- b) Dalip Singh v. State of U.P.*, (2010) 2 SCC 114

III. Misjoinder of Parties

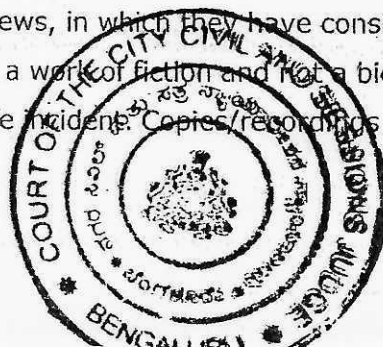
- Defendant Nos.4 to 12 have no connection with the subject matter of the suit and have been unnecessarily arrayed. Defendant No.12 appears to be a fictitious party. Such misjoinder renders the present suit frivolous and it is liable to be dismissed under Order I Rule 9 CPC.

IV. Non-Compliance of Section 80 CPC

- The Defendant No.3 (CBFC) is Central Government authority. 2-month notice u/s 80(1) or court leave u/s 80(2) obtained. Suit not maintainable.
- Case Law:-
 - a) **State of A.P. v. Pioneer Builders (2006) 12 SCC 119**

V. DISCLAIMER:-

- The teaser, (Description) and movie and opening disclaimer clearly state that the film is a work of fiction. The CBFC (Defendant No. 3) has cleared the film and issued a **U/A certificate**, without any indication that the film is based on the real life or case of any named individual. Copy of the CBFC certificate dated 17.03.2026 is being produced as **Document No. 1**.
- The Plaintiffs' submissions are based on selected video clips and distorted media statements torn out of context, which do not accurately reflect the tenor of the film or the declarations made by the Defendants No 1 and 2 in press-meets and interviews.
- The Defendants No 1 and 2 have held multiple press-meets and media interviews, in which they have consistently reiterated that the film "Boss" is a work of fiction and not a biopic or dramatized version of any real-life incident. Copies/recordings of the relevant portions of



~~283~~ ~~235~~ (265)

these press-meets are being placed before this Hon'ble Court.
Document No. 2(Pen-Drive / Video Clips)].

- It is submitted that there is a clear disclaimer at the initial portion of the movie in question which is as follows:

"All characters, names, places and events depicted in this film are purely fictions. This film has absolutely no resemblance of the character to actual person, living or dead. Any similarity of the events herein depicted to the actual happening whether past or present is entirely coincidental, unintentional and is not to hurt any moral, religious or sentimental feelings of any community, caste, or person. We do not promote any of the situation seen this film".

- Thus, from the above it is clear that Disclaimer being prerequisite for film certification and distribution the Defendant No. 1 and 2 have accordingly exhibited DISCLAIMER in the opening of the MOVIE in question.
- Without prejudice it is submitted that the Movie in question does not resemble to any person's life or events in any manner and not event Plaintiffs herein and yet the Defendant No. 1 and 2 have taken necessary and mandatory precautions in exhibiting Disclaimer in the opening portion of the Movie as the same is vital legal and regulatory tools used primarily to mitigate liability and manage audience expectations.

VI. Privacy, Sub-Judice and free expression – Plaintiffs' case fails. . Reliance is placed on:

- **Justice K.S. Puttaswamy (Retd.) v. Union of India, (2017) 10 SCC 1:-** The Supreme Court recognised Right to Privacy as a fundamental right, but has also clarified that public information and fictional expression cannot be equated with private data and cannot be restrained solely on grounds of privacy.
- **K.S. Puttaswamy (Aadhaar) v. Union of India, (2017)-10 SCC 1:-** The Court has further distinguished "personal information" from "generic / public / fictional information".



A fictional film based on imagination does not infringe the privacy of a person whose actual conduct or identity is not accurately depicted.

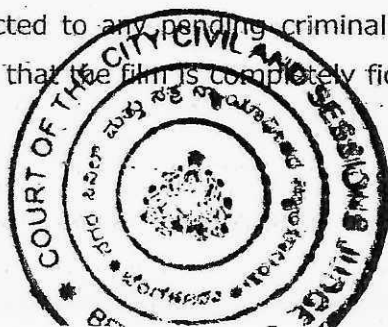
- Sahara India Real Estate Corp. Ltd. v. SEBI, (2012) 10 SCC 603:- The Court has held that "sub-judice" principle applies only where there is direct and specific interference with the administration of justice (e.g., publication of evidence, comments on judicial proceedings). The film in question contains no such material and merely tells a fictional crime-themed story without referencing any specific sub-judice case or trial.
- Applying these principles, there is no violation of privacy or sub-judice principle in the present case. The Plaintiffs cannot bar a fictional film from exhibition merely on the ground that certain generalized similarities exist with real-world events.
- In Adarsh Cooperative Housing Society Ltd vs Union of India, (2018) 1 SCC 778 at p. 785, para 8, the Court held: "Courts of law decide the on the basis of materials brought on record and not on the basis of imagination as projected in a film."

Further at p. 787, para 17:

"The doctrine of sub judice cannot be elevated to such an extent that it negates the right to freedom of speech and expression."

VII. MAKING OF MOVIE IN QUESTION IS A WORK OF CREATIVITY AND FRICTIONS AND DOES NOT RELATE TO ANYBODIES LIFE,PERSONALITY AND EVENTS IN ANY MANNER

- It is specifically denied that the film is based on any real life event or connected to any pending criminal case, the Director has publicly stated that the film is completely fictional and does not portray any



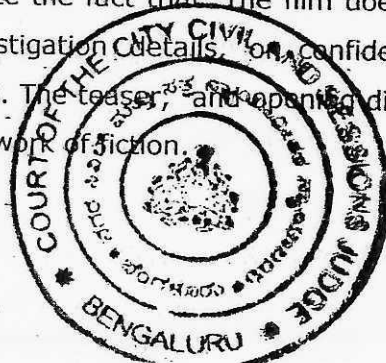
~~285~~ ~~237~~ 267

real life incident or person, and the protagonist of the film is portrayed as a cricketer engaged in social service, with no involvement in any crime, and the storyline of the film does not in any manner depict any incident connected to the Plaintiffs, nor does it seek to defame or disparage them.

- It is submitted that movie in question does not contain any name, photographs, family details, profession of Plaintiff No. 1, or any other particulars, which may lead to the disclosure of alleged similarities of incident which is subject matter of Spl. C. C. No. 1319/2024 as alleged by the Plaintiffs. Therefore, none of the provisions of Cinematography Act have not been violated by the Defendant No. 1 and 2 in any manner whatsoever.
- The Defendants no 1 and 2 have conducted multiple press meets on 29.10.2025, 09.03.2026, and 25.03.2026, at all of which Defendants Nos. 1 and 2 have clearly stated that the film is purely fictional and concept based and has no connection with any real life incident or with Special C C No. 1319 of 2024, videos of all these press meets, where Defendants No. 1 and 2 have spoken about the film "Boss", have been placed on record before this Hon'ble Court in the form of a pen-drive, which has been filed and produced in Court as part of the evidence.

VIII. Film is entirely fictional; no nexus with Plaintiff No. 1

- The Defendant No. 2 (Director) has authoritatively stated that the film "Boss" is based on a completely fictional story drawn from his own imagination and has no connection whatsoever with the life or transactions of Plaintiff No. 1, including the subject-matter of Sessions SPL ,Case No. 1319/2024.. The Plaintiffs misrepresent the film as being based on the personal life or the criminal case of Plaintiff No. 1, despite the fact that The film does not use any police final report, investigation details, or confidential information of the criminal case. The teaser, and the opening disclaimer clearly state that the film is a work of fiction.

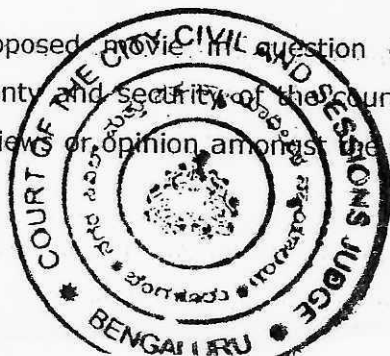


286/238 (268)

- The Movie in question is a fictional work and an artistic vision of the Defendant No. 2 and therefore, the Movie in question is not at all inspired by any bodies real life or events even the Plaintiff No. 1 and 2 in any manner. Therefore, there is nothing related to the Plaintiffs nor incident which is the subject matter of Special CC. No. 1319/2024 in the movie in question and therefore, the question of any adverse effect on the alleged reputation and dignity of the Plaintiffs herein does not arise at all in any manner.
- It is further submitted that the restriction on public viewing of an artistic work should be as per the prescription of law; thus, since the movie in question is completely a fictional work and not going harm the reputation and dignity of anyone, including the Plaintiff No. 1 and 2, therefore, the prayer for main reliefs and also interim reliefs sought by the Plaintiffs herein does not deserve to be accepted. The contents and scenes in the Movie are totally different than the wild apprehensions of the Plaintiffs and incident covered under the Special C.C.No. 1319/2024.

IX. MAKING OF MOVIE IN QUESTION IS A FUNDAMENTAL RIGHT OF THE DEFENDANT NO. 1 AND 2

- It is submitted that film making is recognized as a legitimate medium of expression, allowing artists to challenge norms and express ideas. In fact, this scope of right to freedom of speech and expression has been expanded to include a filmmaker's right to express their thoughts and ideas using the medium of cinema. This right runs with a rider i.e., Reasonable Restrictions. Government bodies like the Central Board of Film Certification (CBFC) can restrict content that threatens public order, security, or decency. In the instant case the CBFC has approved the film and granted necessary Certificate in favour of the Movie. This itself clearly shows that the MOVIE in question does not relates to any bodies life and events not even the Plaintiffs herein.
- The proposed movie in question does not poses a threat to sovereignty and security of the country, national peace or creates wrong views or opinion amongst the public or fans of Plaintiff No. 1



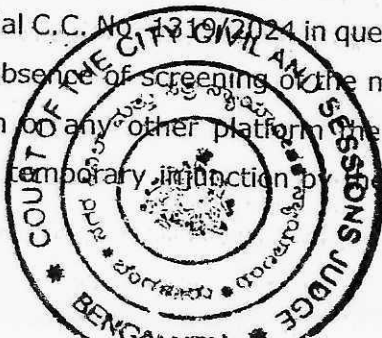
287 (289) (269)

in any manner. In view of this, the Defendant No. 3 has accorded the clearance to the proposed movie in accordance with the provisions of the Cinematograph Act, 1952, and Cinematograph (Certification) Rules, 1983, which prescribe the parameters and process for censorship of films and grant of certification in respect of films declared to be fit for public exhibition

- The proposed Movie in question is a creative fiction produced and Directed by the defendant No. 1 and 2 herein in exercise of their constitutional right conferred by Article 19(1)(a) of the Constitution of India. The contents of the proposed Movie have no connection whatsoever with the subject matter of Spl. C. C. No. 1319/2024.
- It is further submitted that the story has no relationship with the Accused persons, the deceased person or the witnesses in the criminal case in Spl. C. C. No. 1319/2024.

X. PLAINTIFFS' HAVE FILED THE PRESENT SUIT BASED ON ASSUMPTIONS AND PRESUMPTIONS

- It is an admitted fact that the MOVIE in question is not yet released in Theatres or OTT Platforms.
- It is further submitted that the Defendant No. 1 and 2 have released only the Teaser of the Movie in question on electronic and print media. • The Teaser in question runs for a total period of 1 minute 06 second. In this 1 minute 06 Second of the Teaser it is highly difficult to make out a decision that the movie in question is related to the subject matter of Special C.C. No. 1319/2024. This is exactly has been done by the Plaintiffs herein. Firstly it is relevant to state that the Movie in question is not made either based on the subject matter of Special C.C. No. 1319/2024 or Plaintiffs personal lives. However, the Plaintiffs have filed the present suit contending that the Movie is entirely based on the incident which is subject matter of Special C.C. No. 1319/2024 in question. It is relevant to state that in the absence of screening of the movie either in Theatres or OTT Platform or any other platform at the filing of the present suit and seeking temporary injunction by Plaintiffs by making fictitious,



~~288~~ (240) (270)

imaginary and wild guessing is highly absurd, illegal, untenable and vexatious.

XI. MATTER IN QUESTION IS ALREAD IN PUBLIC DOMAIN:

- The Renukaswamy murder case involving actor Darshan [PLAINTIFF NO. 1] is in the public domain and widely reported in Electronic Media, Print Media and Social Media. The incident which is subject matter of Special C.C. No. 1319/2024 remains in the public eye.
- The case has been extensively covered, with details of the remand applications, police investigations, and alleged evidence discussed widely.

XII. MOVIE TITLE OR NAME OF THE MOVIE CALLED 'BOSS' DOES NOT LEADS TO PUBLIC EXPLOITATION OF THE PRIVATE LIFE OF A CELEBRITY-PLAINTIFF NO. 1

- a) Preliminary – Title "BOSS" is a generic word, no exclusive copyright.
- b) The Plaintiffs have approached this Hon'ble Court under the false plea that the title "BOSS" is their exclusive intellectual property, without any basis in law.
- c) "Boss" is a common, generic word in everyday usage and has been used as a film title in Kannada, Hindi and other languages for about twenty (20) years, including with artists such as **Tiger Prabhakar, Akshay Kumar and others. The word "BOSS" is not a coined or distinctive title confined to any one person or producer. It is a generic term in public domain and cannot be appropriated exclusively by any single party.**
- d) Reliance is placed on the following authorities:

- **Krishika Lulla & Ors. v. Shyam Vithalrao Devkatta & Anr., (2016) 2 SCC 521:-** The Supreme Court has held that titles of films or works, ~~by~~ themselves, do not attract copyright



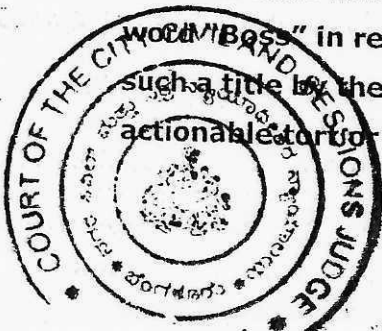
~~209~~ ~~211~~ (271)

protection; a mere title cannot be protected under the Copyright Act, 1957.

- **R.G. Anand v. M/S Deluxe Films & Ors., AIR 1978 SC 1613:-** The Supreme Court laid down the "idea vs. expression" dichotomy: "Idea" or "theme" is not protected; only the "expression" of the idea is protected under copyright law. Using a similar theme or generic title does not amount to infringement.
- **Kanungo Media Pvt. Ltd. v. RGV Film Factory, 2009 (39) PTC 621 (Del).**
- **Biswaroop Roy Choudhary v. Karan Johar, 2013 (54) PTC 257 (Del)**
- Both these decisions also affirm that mere film title is not a protectable subject-matter under copyright law.
- In the present case, the Plaintiffs rely only on the word "Boss" as if it confers an exclusive right. This is wholly misconceived in law and cannot form the basis of any injunction.

.XIII. Registration / Prior user position of the Defendant No1

- The Defendant No. 1 has registered the title "Boss" and the banner "Siri Productions" with the Karnataka Film Chamber of Commerce, No. GJ-10, Krishna Towers, 3rd Main Road, Gandhinagar, Bengaluru - 560032. and such documents are being produced today before this Hon'ble Court. The Plaintiffs have not shown any such registration for their claimed title or banner with the Karnataka Film Chamber of Commerce. Hence, the Defendant No. 1 evinces a prior and bonafide registration in respect of the title and banner, whereas the Plaintiffs have no such claim.
- The Plaintiffs have no exclusive right or registered title to the word "Boss" in relation to any film or business, and the use of such a title by the Defendants does not by itself constitute any actionable tort or infringement.



290 (2/10) 272

- The entire suit is founded on assumptions, conjectures, and surmises rather than on any concrete factual or legal basis, and the Plaintiffs have failed to specifically point out any scene, dialogue, poster, or trailer that causes actionable defamation, infringement of personality rights, or other legal injury, and the suit is, therefore, a loose attempt to suppress artistic freedom on the basis of speculative grievances.

XIV. FREEDOM OF EXPRESSION CANNOT BE SUPPRESSED ON ACCOUNT OF MERE RIGHT TO PRIVACY AND PERSONALITY RIGHTS.

- The Central Board of Film Certification (CBFC) has granted certification to the film on 17.03.2026, which indicates that the film does not contain any objectionable material as per the statutory authority entrusted with such expert evaluation, It is well settled that the law relating to films and freedom of expression is governed by constitutional principles.
- **In K.A. Abbas v. Union of India, (1971) 2 SCC 781**, the Hon'ble Supreme Court held that films are a medium of expression protected under Article 19(1)(a), though subject to reasonable restrictions under Article 19(2).
- **In S. Rangarajan v. P. Jagjivan Ram, (1989) 2 SCC 574**, the Court categorically held that freedom of expression cannot be suppressed on account of threat of demonstration, processions, or threats of violence, and that once a film is certified it should not be lightly interfered with by courts.
- **In Bobby Art International v. Om Pal Singh Hoon, (1996) 4 SCC 1**, the Supreme Court held that courts should not sit as a super-censor board once the film has been certified by the statutory authority.
- **In F.A. Picture International v. Central Board of Film Certification, (2002) 5 SCC 262**, it was held that once a film is certified, courts must exercise restraint in granting injunctions restraining exhibition.



have failed to explain as to whose right to fair trial has been claimed and in what manner the movie would impact the right of fair trial of any of the stakeholders.

XVII. Prima facie case, balance of convenience, irrevocable injury Injunction not justified.

- The test for grant of interim injunction is well-settled and has been reiterated in cases such as:
- **Midas Hygiene Industries Pvt. Ltd. v. Sudhir Bhatia & Ors., (2004) 3 SCC 204**
- Gujarat Bottling Company Ltd. v. Coca-Cola Co., (1995) 5 SCC 545
- These cases lay down the three-fold test of **Prima facie case, Balance of convenience, Irreparable / serious injury if the injunction is not granted (or maintained)**
- In the present case The Plaintiffs have no prima facie case, because, they cannot claim exclusive copyright over the generic title "Boss" as discussed above. The film is wholly fictional and not based on Plaintiff No. 1's life. The balance of convenience clearly tilts in favour of the Defendants No. 1 & 2, as: They have already suffered substantial tangible and intangible loss (financial, reputational and professional).The Plaintiffs have not shown any concretely foreseen loss arising from the release of the film. The continued continuation of the stay will cause irreparable injury to the **Defendants, including: Loss of release window, Collapse of distribution and booking deals, Loss of revenue and damage to brand-value of the banner and the Director.**
- This is not a case where the Court should allow an interim ex parte order to continue, based on hypothetical fears and unsupported allegations of the Plaintiffs.

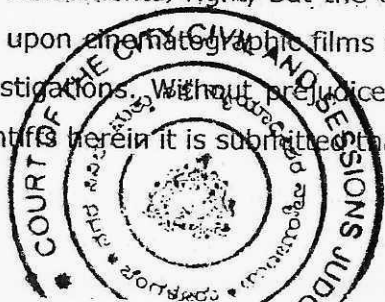
XVIII. PLAINTIFFS FAILED TO MAKE OUT A PRIMA FACIE CASE:-



- **In Viacom 18 Media Pvt. Ltd. v. Union of India, (2014) 1 SCC 417**, the Hon'ble Supreme Court restrained States from interfering with the exhibition of a certified film and upheld the freedom of expression of filmmakers.
- **In Nachiketa Walhekar v. Central Board of Film Certification, (2018) 15 SCC 1**, it was reiterated that creative freedom must be protected and that courts should interfere only in cases involving a clear violation of law or injurious effect to public interest, in light of these authorities, the present film being duly certified by the CBFC on 17.03.2026 has not violated any bodies alleged personality rights or infringement of fundamental rights or privacy.

XV. Right to privacy:- It is submitted that in the instant case the Plaintiffs herein have failed to make out a case for grant of interim injunction to restrain the release of the movie in question. It is submitted that the movie in question does not relate to the incident covered under the Special Criminal Case No. 1319/2024 pending on the file of this Hon'ble Court. It is relevant to state that the Plaintiff No. 1 is an actor by profession. However, the Hero in the movie in question is a Cricketer by profession. It is further submitted that the name of the Hero in the movie is Tanush and also called as BOSS by his fans in the movie. It is further submitted that the other characters in the entire movie are solely created based on frictions, imaginations and novel thoughts. It is further submitted that the Hero at the end of the movie in question shown as elected [MLA] of a particular Assembly Constituency. Thus, the contents of the movie and the contents of the incident which is subject of Spl. C.C. No. 1319/2024 are totally different. Therefore, the right to privacy of the plaintiffs is not at all affected and there shall be no humiliation of the Plaintiffs by virtue of release of the movie in question.

XVI. The right to fair trial:- It is further submitted that in a number of cases the Hon'ble Apex Court of India has held that though right to fair trial is a fundamental right, but the courts and investigating agencies do not rely upon cinematographic films to render a decision or carrying on their investigations. Without prejudice and without admitting the claim of the Plaintiffs herein it is submitted that in the instant case the plaintiffs herein

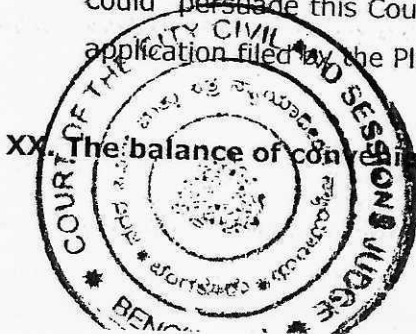


293 (214)

275

- It is further submitted that the Plaintiffs herein have no prima facie case in their favour. On the other hand, the Defendant No. 1 and 2 herein have made out a clear prima facie case in their favour. It is relevant to state that the present suit and I.A. No. 1 is filed by the Plaintiffs herein merely on the basis of apprehensions, wild guess and assumptions and presumption. The Movie in question is not at all related to or based upon the subject matter of Special C.C. No. 1319/2024.
- It is further submitted that the news related to the movie in question was started long time back and the present suit is preferred just few days after the movie teaser which was aired on 09.03.2026.
- The movie in question has already been gearing to be released over the OTT Platform on 24.04.2026. Therefore, at this juncture, if any interim order, as prayed by the Plaintiffs herein, is passed against the movie in question, the same would result into unwarranted and huge financial loss to the respondent-producer of the film. Thus, in the given factual matrix, on that count also, this Hon'ble Court would not find any case allegedly made out by the Plaintiffs for passing any interim order as prayed by the Plaintiffs herein.
- It is further submitted that this Hon'ble Court needs to see as to whether any case of irreparable loss was made out by the Plaintiffs in the present case and the Plaintiffs herein can seek compensation against damages and defamation if there is any violation of the reputation and dignity of the Plaintiffs herein by the acts of the Defendants herein. However, considering the facts and circumstances of the present case, it is established and demonstrated that the Defendant No. 1 and 2 would suffer huge loss, injury, mental pain and agony in the event if the I.A. No. 1 is allowed as prayed for.
- It is further submitted that as per the teaser of the movie in question, there is nothing directly found related to the Plaintiff No. 1 which could persuade this Court to grant the relief prayed for in the stay application filed by the Plaintiffs.

XX. The balance of convenience:-



274 275 276

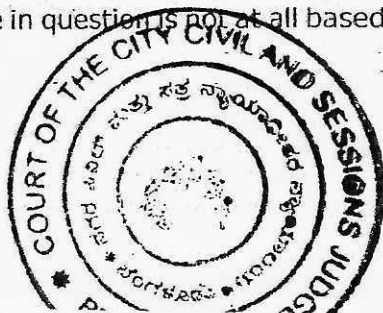
- It is submitted that the it is almost for the last one year that the movie in question has been in making. The Defendant No. 1 and 2 have also obtained necessary approvals, permissions from the Censor Board for the release of the movie and the Defendant No. 1 and 2 almost on the verge of releasing the movie by concluding the teasers in the electronic and Social Media and at this juncture the Plaintiffs herein have sought for injunction.
- Further the Defendant No. 1 herein has already been spent in making the movie by investing huge amount of money. Therefore, the balance of convenience lies heavily in favour of the Defendant No. 1 and 2. It is further submitted that the Plaintiffs herein shall have a remedy of seeking damages in case in violation of right of the plaintiffs is established on screening the movie in question.

XXI. LOSS AND INJURY:-

- It is further submitted that in the instant case the Defendant No. 1 and 2 for the above reasons and bonafide facts shall be subjected to irreparable loss and injury after having invested their money in preparing the movie in the event if the injunction is granted as prayed for in I.A. No. 1.
- On the other hand, the plaintiffs have not been able to demonstrate what irreparable loss and injury caused to the plaintiffs if the movie is screened. Thus, it may thus be concluded that the plaintiffs have not been able to establish any of the three limbs i.e. prime facie case, balance of convenience or irreparable loss or injury in their favour. The plaintiffs are, therefore, the Plaintiffs herein are not entitled to injunction.

XXII. Defamation and emotional trauma:-

- It is submitted that the movie in question is not a libel or slanderous in nature to the Plaintiffs herein. The portrayal of Hero depicted in the movie in question is not at all based on the incident covered under



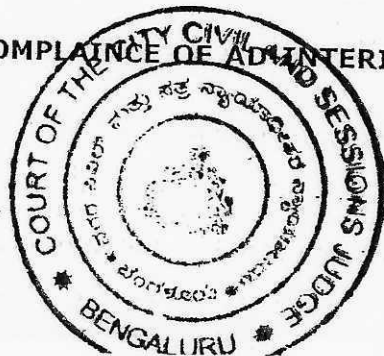
the criminal case in Spl. C.C. No. 1319/2024 as contended by the Plaintiffs in the present suit.

- In fact, Hero in the movie has been shown in a good manner such as humble person, generous persons etc. The Hero in the movie has no connection to the alleged murder of a person. In fact all the characters depicted in the movie are completely fictional and out of imaginations.
- It is further submitted that the plaintiffs herein have pleaded about alleged emotional trauma in the present case. However, it is relevant to state that it is well settled principles of law that emotional trauma per se may be relevant as a component of defamation, but cannot be the sole basis for making a prima facie case in favour of the applicant/s.

XXIII. Defamation / mental / psychological harm to Defendants No. 1 & 2

- Since the passing of the ex parte stay order, the Plaintiffs have engaged in a media-driven campaign, projecting the film as being "against" or "targeting" Plaintiff No. 1, and have misused the existence of the Court's order to create an adverse public perception against the Defendants.
- **As a result:** YouTube channels, news portals and newspapers have published inflammatory and defamatory statements against Defendant No. 1 (Producer-Banner) and Defendant No. 2 (Director), including insinuations that they are intentionally "targeting" a litigant in a criminal case. This has caused serious mental agony, reputational harm and loss of professional goodwill of both Defendants. The Defendants' families and associates are also being targeted or threatened through social media and sensational reports.

XXIV. NON-COMPLAINT OF ADM INTERIM ORDER OF TEMPORARY INJUNCTION



- It is submitted that the Plaintiffs obtained an ex-parte stay order without proper service of summons, and mere service through WhatsApp, without sending complete pleadings and documents, does not constitute valid service under Order 5 Rule 9 CPC and Section 27 CPC, and such defective service amounts to a denial of the opportunity of hearing and violates the principles of natural justice under Articles 14 and 21 of the Constitution of India.
- The Plaintiffs herein have furnished a complete set of Plaint, I.As and Plaintiff Documents to the Defendant No. 1 and 2 towards compliance of ad-interim order of temporary injunction. There is not document produced by the Plaintiffs to this effect.

XXIV. Media Publicity & Financial Loss:- Due to the ex parte stay order and widespread publicity:

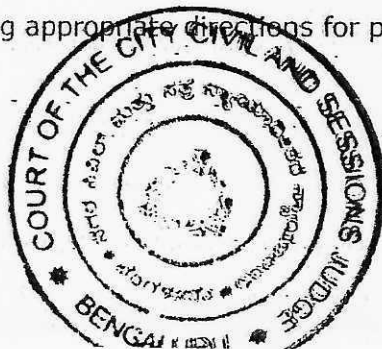
- Release scheduled on 24.04.2026 is obstructed & Distribution and business transactions are severely affected.
- The Defendant No.1 is suffering loss running into crores of rupees.
- Reputation and goodwill of Defendant Nos.1 & 2 are seriously damaged

XXV. Abuse of Process of Court

- The present suit has been filed with malafide intention to stall the release of the film, cause financial loss, and damage the reputation of the Defendants. Such conduct amounts to abuse of process of this Hon'ble Court.

XXVI. Threat Perception & Safety

- Due to false allegations and provocative media content, there is a reasonable apprehension of threat to the life and safety of Defendant Nos.1 & 2 and their families. This Hon'ble Court may kindly consider issuing appropriate directions for protection.



~~297~~ (279) (279)

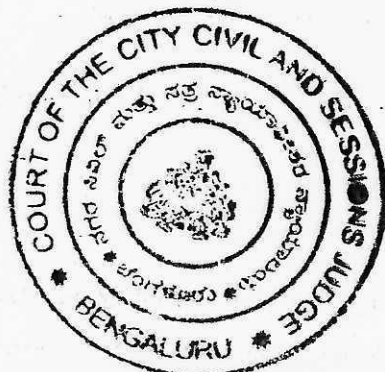
- It is submitted that the Plaintiffs herein have not filed an Affidavit towards compliance of ad-interim order of temporary injunction in question. On the other hand, an advocate has filed memorandum of facts towards the compliance of interim order in question.
- This practice is un-known to the procedural laws i.e., CPC and Civil Rules of Practice. □ No explicit authorisation is produced by the Plaintiffs while furnishing Memorandum of Facts instead of Affidavit at the time of alleged compliance of ad-interim order of temporary order in question. Hence, the ad-interim order of temporary injunction is liable to be vacated on this ground alone. In view of the foregoing, it is most respectfully prayed that this Hon'ble Court may be pleased to dismiss the I.A. No. 1 as being devoid of merits, not maintainable, and barred by lack of legal injury, vacate the ex-parte stay order granted against the Defendants and pass such further orders as this Hon'ble Court deems fit in the interest of justice, equity, and good conscience.

Wherefore, it is humbly prays to this Hon'ble Court that it may kindly be pleased to dismiss the I.A. No. 1 filed by the Plaintiffs and vacate the ad-interim order of temporary injunction with exemplary costs in the interests of justice and equity.

Bengaluru

Date

Advocate for Defendant No. 1 & 2

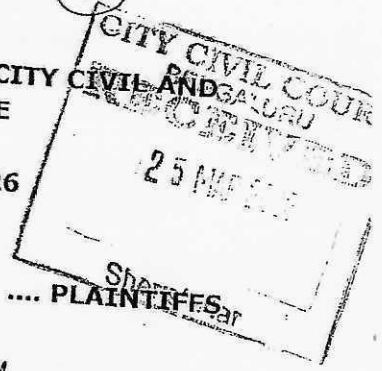


298 (260) 280

24a

IN THE COURT OF THE HON'BLE PRINCIPAL CITY CIVIL AND SESSIONS JUDGE, BANGALORE

O.S. No. _____ /2026



BETWEEN:
SRI. DARSHAN SRINIVAS & Anr.

AND:
SIRI PRODUCTIONS & Ors

..... DEFENDANTS

VALUATION SLIP

Serial No. of the property in plaint schedule	The Clause of Sec. 7 (2) of the Karnataka Court Fees and Suits valuation Act, 1958 under which the property comes	The amount of revenue or other basic for valuation	Method adopted to arrive at the valuation	Valuation arrived at
1	2	3	4	5
1.	Not Applicable		As per Section 26(c) of the Karnataka Court Fees and Suits Valuation Act, 1958 The suit is valued at Rs. 1000/- (Rupees Thousand Only)	Court Fee of Rs. 25/- (Rupees Twenty-Five Only)
2.	Not Applicable		As per Section 24(d) of the Karnataka Court Fees and Suits Valuation Act, 1958 The suit is valued at Rs. 1000/- (Rupees Thousand Only)	Court Fee of Rs. 25/- (Rupees Twenty-Five Only)
3.	Not Applicable		As per Section 26(c) of the Karnataka Court Fees and Suits Valuation Act, 1958 The suit is valued at Rs. 1000/- (Rupees thousand Only)	Court Fee of Rs. 25/- (Rupees Twenty-Five Only)



[Handwritten signature]

~~209~~ ~~207~~ ~~246~~ 281

4.	Not Applicable		As per Section 26(c) of the Karnataka Court Fees and Suits Valuation Act, 1958 The suit is valued at Rs. 1000/- (Rupees Thousand Only)	Court Fee of Rs. 25/- (Rupees Twenty-Five Only)
5.	Not Applicable		As per Section 26(c) of the Karnataka Court Fees and Suits Valuation Act, 1958 The suit is valued at Rs. 1000/- (Rupees Thousand Only)	Court Fee of Rs. 25/- (Rupees Twenty-Five Only)
6.	Not Applicable		As per Section 26(c) of the Karnataka Court Fees and Suits Valuation Act, 1958 The suit is valued at Rs. 1000/- (Rupees Thousand Only)	Court Fee of Rs. 25/- (Rupees Twenty-Five Only)
7.	Not Applicable		As per Section 26(c) of the Karnataka Court Fees and Suits Valuation Act, 1958 The suit is valued at Rs. 1000/- (Rupees Thousand Only)	Court Fee of Rs. 25/- (Rupees Twenty-Five Only)
Total				Rs.175/- (Rupees One Hundred and Seventy Five only)

PLACE: BENGALURU

DATE: 25.03.2026


ADVOCATE FOR PLAINTIFF



300 (282)

BEFORE THE HON'BLE HIGH COURT AT BANGALORE
(Original Jurisdiction)

MFA

No. /2026

Darshan S & Anr

Vs.

SIRI PRODUCTIONS SONS

We, Darshan S & Vijaylakshmi Darshan, the Appellants herein in the above Appeal/Complaint, do hereby appoint and retain Mr.Pratham Narendrakumar , Alok GS & Vivek GB, Advocates, to appear, act and plead for us in the above matter and to conduct, and prosecute / defend the same, including in all interlocutory or miscellaneous proceedings connected with the same, or connected with any decree or orders passed therein, and in appeals, and / or other proceedings arising therefrom, and also in proceedings for review of judgment and for leave to appeal to the Supreme Court and to obtain return of any documents filed therein.

We hereby authorise them on my behalf to enter into a compromise in the above matter, to execute any decree / order therein, to appeal from any decree/order therein and to plead in such appeal preferred by any other party from any decree/order therein.

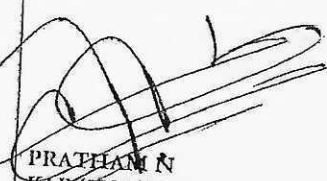
Executed by me/ us on this, the 10th day of June, 2026 at Bangalore.

"Before me"

Signature/s

Asst. Superintendent
Central Prison
BANGALURU
10/6/26
Darshan S & Vijaylakshmi Darshan
UTP No. 7.314/25

Executant/s personally known to me, and he / they has / have signed in my presence
Satisfied as to the identity of the executants/s signature/s
Certified that the contents were explained to the executant/s in my presence in
language known to him / them, and he / they appear perfectly to understand the same.

Accepted:	Address for Service:
 PRATHAM N KAR/2881/2018	DHEE Inc., Advocate & Solicitors, #401 (south wing), Brigade Plaza, Anandh Rao Circe, Bangalore 560 009.. + 91 8397056064
ALOK G S KAR/1/2019	
VIVEK G B KAR/1091/2020	

Advocate for: Petitioner No. 1 & 2
Place: Bengaluru
Date:

282

283

IN THE HIGH COURT OF KARNATAKA AT BENGALURU

MFA No. /2026

BETWEEN

MR. DARSHAN SRINIVAS & ANR

...APPELLANTS

AND

SIRI PRODUCTIONS & Ors

....RESPONDENTS

INDEX

Sr. No.	PARTICULARS	PAGE NOS
	I.A. No. ____/2026 — Application under Order XXXIX	
1.	Rule 1 & 2 r/w Section 151 CPC for stay of the Impugned Order.	283 - 285
2.	Verifying Affidavit	286 - 298

Place: Bengaluru

Date: 16.06.2026


ADVOCATE FOR APPELLANTS

~~313~~ ~~262~~ ~~287~~ 283

IN THE HIGH COURT OF KARNATAKA AT BENGALURU
MISCELLANEOUS FIRST APPEAL No. _____ OF 2026 (CPC)

B E T W E E N

- 1. SRI. DARSHAN SRINIVAS,**
Aged 47 years, S/o Late
Thoogudeepa Srinivas,
#217, Thoogu Deepa Nilaya, F-Road,
Ideal Home Township,
Rajarajeshwari Nagar, Bengaluru,
Karnataka - 560 098.
- 2. SMT. VIJAYALAKSHMI
DARSHAN,**
Aged 43 years, W/o Darshan
Srinivas,
#217, Thoogu Deepa Nilaya, F-Road,
Ideal Home Township,
Rajarajeshwari Nagar, Bengaluru,
Karnataka - 560 098.

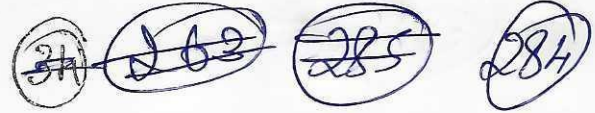
...PLAINTIFFS/APPELLANTS

AND

RESPONDENTS:

- 1. SIRI PRODUCTIONS
(Proprietorship Concern),**
Represented by its
Proprietor/Producer Sri. Tanush S,
No.131, Sri Ranganatha Nilaya,
Dasanapura, Tumkur Road,
Bengaluru - 562 162.
- 2. SRI. LAVA V**

No.131, Sri Ranganatha Nilaya,
Dasanapura, Tumkur Road,
Bengaluru - 562 162.
- 3. CENTRAL BOARD OF FILM
CERTIFICATION (CBFC),**
(Union of India), Through its
Regional Officer, Shri Yashwant
Shehnai,
Kendriya Sadan, 'D' Wing, 4th Floor,
17th Main, Koramangala, Bengaluru
- 560 034.
- 4. KARNATAKA FILM CHAMBER OF
COMMERCE (KFCC),**
Through its President, Sri.
Jayapradha,



28, 1st Main Road, Crescent Road,
High Grounds, Bengaluru – 560 001.

**5. META PLATFORMS, INC.
(FACEBOOK),**

Through its Authorized
Signatory/Grievance Officer,
India Office: 15th Floor, World Trade
Center, Brigade Gateway,
Malleswaram West, Bengaluru –
560 055.

6. X CORP (formerly Twitter),

Through its Authorized
Signatory/Grievance Officer,
India Office: 9th Floor, World Trade
Center, Brigade Gateway,
Malleswaram West, Bengaluru –
560 055.

7. GOOGLE LLC (YOUTUBE),

Through its Resident Grievance
Officer for YouTube, Suraj Rao,
Unit No.26, The Executive Centre,
Level 8, DLF Centre, Sansad Marg,
Connaught Place, New Delhi – 110
001

8. NEW INDIAN EXPRESS,

Registered Corporate Office: Express
Garden, 29, 2nd Main Road,
Ambattur Industrial Area, Chennai –
600 058.
Bengaluru Office: No.1, Express
Building, Queens Road, Bengaluru –
560 001. Represented by its Editor.

**9. FILMIBEAT (Greynium
Information Technologies Pvt. Ltd.),**


VRR Legacy No.2, 1st Main, 4th
Floor, 1st Block Koramangala,
Jakkasandra Extension, Bengaluru –
560 034.

10. TV9 KANNADA,

TV9 Karnataka Pvt Ltd
13/1 Rhenius Street,
Richmond Town,
Bengaluru 560 025

11. ZEE KANNADA NEWS,

5th floor, the Land Mark Buidling,
Next to Trinity Metro Station,



MG Road, Yellappa Chetty Layout,
Bengaluru 560 042

12. SRI. ASHOK KUMAR,

...RESPONDENTS

**INTERLOCUTORY APPLICATION UNDER S. 94 (D) R/W ORDER
XXXIX RULES 1 & 2 READ WITH SECTION 151 OF THE CODE OF
CIVIL PROCEDURE, 1908, SEEKING AD-INTERIM EX-PARTE
TEMPORARY INJUNCTION.**

The Applicants above-named most respectfully submit as follows:

For the reasons stated in the accompanying affidavit the Plaintiffs humbly pray that this Hon'ble Court may be pleased to issue the following ad-interim ex-parte and/or Temporary injunction:

- a.** Grant Ad-interim temporary injunction restraining the Respondent No.1 & 2, , its partners/proprietors, directors (including Lava V), producers, actors (including Thanush Shivanna), servants, agents, employees, assignees, or anyone claiming through or under them, from in any manner producing, filming, editing, promoting, marketing, releasing, distributing, exhibiting, telecasting, streaming, selling, licensing, leasing, or dealing with the movie titled "BOSS" (or any other movie/film/web-series/content by whatever name called) that is based on, depicts, or refers to the life of the Applicants, the incidents alleged in C.C. No.1319/2024, or any elements directly or indirectly associated with the Applicants' private life, family, reputation, or the sub-judice criminal proceedings, and from using the Applicants' name, image, likeness, personality rights, or any promotional material (posters, teasers, trailers, press meets, interviews, etc.) in any medium including Theatres and/or Intermediary Streaming Platforms (OTT) whatsoever by appointing a receiver for enforcement of the present order in the interest of justice & equity.
- b.** Pass such other and further orders as this Hon'ble Court may deem fit and proper in the facts and circumstances of the case.

This application may be taken on record in the interest of justice and equity.



ADVOCATE FOR PLAINTIFF

Place: BENGALURU

Date:

27⁵ 285 287 286

**IN THE HIGH COURT OF KARNATAKA AT BENGALURU
MISCELLANEOUS FIRST APPEAL No. _____ OF 2026 (CPC)**

B E T W E E N

SRI.DARSHAN SRINIVAS & Anr

....APPLICANTS

AND

SIRI PRODUCTIONS & Ors

...RESPONDENTS

AFFIDAVIT

I, Smt. Vijayalakshmi Darshan, aged about ___ years, Wife of Sri. Darshan Srinivas, residing at #217, Thoogu Deepa Nilaya, F-Road, Ideal Home Township, Rajarajeshwari Nagar, Bengaluru – 560098, do hereby solemnly affirm and state as follows:

1. I am the Appellant No.2 in the present case and I am authorised to swear this affidavit on behalf of the Appellant No.1 and hence this Affidavit., Appellant No.1 is one of the most celebrated actors in the Kannada film industry, universally and exclusively identified by his trade monikers 'Challenging Star Darshan,' 'Boss,' and 'D Boss.' These appellations are not mere titles but constitute a unique, singular, and commercially valuable personality identity inseparably associated with the Appellant No.1 in the minds of the public of Karnataka and the South Indian film industry.
2. On 09.06.2024, Crime No.0250/2024 was registered by the Kamakshipalya Police Station, Bengaluru, under Sections 302 and 201 IPC against Appellant No.1 (arrayed as Accused No.2), in connection with the

Vijayalakshmi Darshan

~~38~~ ~~286~~ ~~288~~ 287

alleged murder of Sri. Renukaswamy, a fan of Appellant No.1. Upon filing of the charge sheet, the matter was registered as S.C. No.1319/2024 before the LVI Additional City Civil and Sessions Judge, Bengaluru. The trial is presently ongoing on a day-to-day basis. Appellant No.1 is an undertrial prisoner. The presumption of innocence under Article 21 of the Constitution operates fully and unreservedly in his favour.

3. In this charged milieu, Respondents No.1 (Siri Productions, represented by Sri. Tanush S) and No.2 (Sri. Lava V, director) produced a Kannada feature film bearing the title 'BOSS.' On 09.03.2026, Respondents No.1 and No.2 released the teaser of the film on YouTube, X/Twitter, and Facebook, bearing in its very opening frame the declaration: 'Inspired by True Events.' A plain viewing of the teaser discloses a minimum of thirteen (13) precise, deliberate, and unmistakable factual parallels to the prosecution's case in S.C. No.1319/2024, including: (a) the film's title 'BOSS' — which is the exclusive public identity of Appellant No.1; (b) the protagonist called 'Boss' by his fans; (c) a celebrity accused of involvement in the death of a fan who sent objectionable messages to the protagonist's wife; (d) the victim's alleged plea 'Don't kill me, I have a pregnant wife and aged parents' — a verbatim replication of material in the FIR; (e) the victim's body found near a 'Palya'; (f) the protagonist's wife named 'Lakshmi'; and (g) the film being Bengaluru-centric in all settings.
4. Upon becoming aware of the film, the Appellants issued a statutory notice to the Central Board of Film Certification (Respondent No.3/CBFC) under Section 5B of the Cinematograph Act, 1952 on 12.03.2026. Notwithstanding the statutory notice and the existence of five binding protective court orders (tabulated below), the CBFC issued Certificate No. DIL/7/33/2026-BAN on 17.03.2026 — a mere five days after the notice — based on a demonstrably false plot summary provided by Respondents No.1 and No.2, which described the protagonist as a 'famous cricket player' — a characterisation that finds no reflection in the teaser, promotional material, or the publicly available content of the film.

Ujjal Debnath

5. The Appellants instituted O.S. No.2151/2026 before the XVII Additional City Civil and Sessions Judge, Bengaluru (CCH-16), and on 27.03.2026, the Learned Trial Court, upon recording a prima facie case, granted a comprehensive ex-parte ad-interim injunction under Order XXXIX Rules 1 & 2 r/w Section 151 CPC, restraining Respondents No.1 and No.2, their servants, agents, and all persons claiming through them, from in any manner producing, filming, editing, promoting, marketing, releasing, distributing, exhibiting, telecasting, streaming, selling, licensing, leasing, or otherwise dealing with the film titled 'BOSS' or any content based on the Appellants' life, the pending criminal proceedings, or their personality rights.
6. In defiance of this order, Respondents No.1 and No.2, acting in concert with Respondents No.5, No.6, and No.7 (Meta/Facebook, X Corp, and Google/YouTube), continued the promotion and exhibition of the teaser and promotional material of the film 'BOSS' on mass digital platforms throughout the period 27.03.2026 to 02.06.2026
7. By the Impugned Order dated 02.06.2026, the Learned XVII Additional City Civil and Sessions Judge: (i) dismissed I.A. No.1; (ii) vacated the comprehensive ex-parte ad-interim injunction; (iii) characterised the Appellants' case as founded on 'wild guessing/imaginings'; (iv) held that the Court 'cannot sit as a Super Censor Board'; (v) held that the balance of convenience lay with the Respondents on account of commercial investment; and (vi) held that monetary compensation would adequately recompense any injury to the Appellants if they succeeded at trial. The Impugned Order has thus removed the only operative judicial barrier to the release of the film 'BOSS' and its consequent mass-audience exposure to a dramatised, commercially produced version of the prosecution's case in a murder trial that is ongoing and unresolved
8. The Appellants are informed and verily believe that Respondents No.1 and No.2 are actively taking steps to schedule a theatrical release and/or streaming release of the film on OTT platforms with immediate effect. The Applicants most respectfully submit that unless this Hon'ble Court intervenes by way of an ad-interim ex-parte stay of the Impugned Order and a consequential restraint upon the release of the film, the Impugned

Vijay Saran

Order will be rendered irreversible in its consequences and the relief sought in the MFA will become wholly infructuous.

TABLE OF SUBSISTING PROTECTIVE ORDERS

Case No.	Forum	Date	Relief granted
O.S. No. 4267/2024	City Civil Court, Bengaluru	19.06.2024	Ad-interim restraint against publication of unauthenticated/defamatory content about Appellant No.1 or the investigation in Crime No.0250/2024.
O.S. No. 6082/2024	City Civil & Sessions Court, Bengaluru	27.08.2024	Ex-parte TI restraining airing/publishing statements or investigation, charge sheet, FSL reports, confessional statements.
W.P. No. 24836/2024	High Court of Karnataka	10.09.2024	Restraint on dissemination of charge sheet material; MIB directed to act on Programme Code violations.
O.S. No. 7875/2024	City Civil Court, Bengaluru	11.11.2024	Ad-interim injunction against unverified statements lowering Appellant No.1's image in print/TV/digital media.
W.P. No. 7473/2026 (NC:2026:KHC:24468)	High Court of Karnataka, pe Hon'ble	30.04.2026	Writ petition allowed in part; MIB and MEITY directed to take immediate action under the Cable Television

Vijay Dabur

	Mr. Justice Sachin Shankar Magadum	Networks (Regulation Act, 1995; broadcast declared per se illegal prima facie contemp found.
--	---	--

**PART II: PRIMA FACIE CASE – THE APPLICANTS HAVE AN
OVERWHELMING AND DEMONSTRABLE PRIMA FACIE CASE**

The Applicants most respectfully submit that a compelling and overwhelming prima facie case is made out on the following grounds, each of which is independently sufficient and cumulatively irresistible:

A. Thirteen Undeniable Factual Parallels – The Impugned Order's Finding of 'Wild Guessing' is Perverse

9. The Applicants' prima facie case is not founded on speculation. It is founded upon thirteen objectively ascertainable factual parallels between the film 'BOSS' and the prosecution's case in S.C. No.1319/2024, each of which is visible in the teaser that is part of the record before the Trial Court. These parallels include the verbatim replication of the alleged last words of the deceased victim, the precise geographical reference to 'Palya,' the naming of the protagonist's wife as 'Lakshmi,' the 'Inspired by True Events' declaration in the opening frame, and the unique moniker 'Boss' — which, in the context of Kannada cinema and Karnataka public discourse, identifies one and only one person: Appellant No.1. The Ld. Trial Court's characterisation of this case as based on 'wild guessing/imaginings' is ex-facie perverse.

10. The legal test for similarity in cases involving films based on real sub-judice events is not a character-for-character identity, but whether the substance and overall impression of the film is based on the real events constituting the subject matter of the ongoing proceedings. A colourable device — calling the protagonist a 'cricketer' in a paper summary while retaining thirteen precise factual parallels — cannot sanitise the film. It is the substance and the overall impression that governs.

Vijay Shankar

B. The Black Friday Ratio — Directly Applicable and Not Distinguished by the Trial Court

11. The Division Bench of the Bombay High Court in *Mushtaq Moosa Tarani v. Government of India* (2005 SCC OnLine Bom 385) — commonly known as the 'Black Friday' case — granted injunction against a CBFC-certified film based on events forming the subject matter of a pending criminal trial, holding at paragraph 12 thereof:

The film is based on the real events which are the subject matter of the pending trial...It is likely to have a prejudicial effect on the fair administration of justice. It prejudices and, in any case, tends to interfere with the due course of judicial proceeding...Cinema is a powerful medium capable of stirring emotions far more deeply than news reports, and even a trained judicial mind cannot be presumed completely immune from its influence.

— **Mushtaq Moosa Tarani v. Government of India, (2005 SCC OnLine Bom 385), para 12**

C. Constitution Bench Authority Empowers Grant of the Relief Sought

12. The Constitution Bench of the Supreme Court in *Sahara India Real Estate Corpn. Ltd. v. SEBI* (2012) 10 SCC 603 expressly held at paragraphs 17 and 20 thereof:

We hold that the High Courts and the Supreme Court have inherent jurisdiction to pass postponement orders...in appropriate cases...The postponement orders can be passed by courts even in civil and criminal cases to prevent real and substantial risk of prejudice to the proper administration of justice as a last resort where such risk cannot be prevented by other reasonably available means.

— **Sahara India Real Estate Corpn. Ltd. v. SEBI, (2012) 10 SCC 603, paras 17 & 20 (Constitution Bench)**

Vijay Dabhan

D. Trial by Cinema – A Fortiori More Prejudicial than Trial by Media

13. The Supreme Court in *M.P. Lohia v. State of West Bengal* (2005) 2 SCC 686 (at paragraph 5) strongly deprecated 'trial by media when the matter is sub-judice' as 'interference with the administration of justice.' In *Sidhartha Vashisht @ Manu Sharma v. State (NCT of Delhi)* (2010) 6 SCC 1 (at paragraph 47), the Supreme Court reaffirmed that any publication which tends to prejudice a fair trial and interferes with the administration of justice amounts to contempt of court. If a news report qualifies as prejudicial pre-trial publicity, a commercially distributed full-length feature film — with its far greater emotional impact, mass reach, and artistic persuasion — is a fortiori more severely prejudicial.
14. This Hon'ble Court, in its own order in W.P. No.7473/2026 (NC:2026:KHC:24468) pronounced on 30.04.2026, per the Hon'ble Mr. Justice Sachin Shankar Magadum, held at paragraph 24 thereof: 'Freedom of speech is a cherished constitutional value; however, when it degenerates into media-driven adjudication, it ceases to be a safeguard of democracy and becomes a threat to it...Courts cannot permit the course of justice to be overshadowed by the glare of studio lights.' The Impugned Order, by permitting the release of the film 'BOSS,' directly contradicts this coordinate order of this Hon'ble Court.

E. CBFC Certification is Not Dispositive – Certificate Obtained by Misrepresentation is Void Ab Initio

15. The Ld. Trial Court held that it 'cannot sit as a Super Censor Board.' This is a fundamental misconstruction of the Court's role. The question before the Ld. Trial Court was not one of censorship — it was whether the exhibition of the film would amount to contempt of court and interference with the administration of justice. That is a question exclusively within the domain of courts and not the CBFC. The Division Bench in the Black Friday case expressly rejected the identical CBFC-certification defence at paragraph 14 thereof: 'Merely because the film has been certified by the Board of Censors does not mean that a court cannot restrain its public exhibition, if the court comes to the conclusion that the exhibition of the

Vijay Shankar

film would amount to contempt of the court...The Board of Censors is not a court.'

16. Further, Certificate No. DIL/7/33/2026-BAN was obtained by Respondents No.1 and No.2 on the basis of a demonstrably false plot summary — describing the protagonist as a 'famous cricket player' when the teaser contained no cricket content whatsoever. A certificate obtained through material misrepresentation or fraud is void ab initio under the general law and cannot confer any legitimacy upon the film's exhibition.

F. Personality Rights and Privacy Under Article 21 — Constitutionally Protected Rights Are Being Commercially Violated

17. The Nine-Judge Constitution Bench in Justice K.S. Puttaswamy (Retd.) v. Union of India (2017) 10 SCC 1 (at paragraph 297) held that privacy is a constitutionally protected right under Article 21 encompassing individual autonomy and control over vital aspects of one's life. The Supreme Court in R.N. Rajagopal v. State of Tamil Nadu (1994) 6 SCC 632 held that no person can publish anything concerning an individual's family, marriage, or personal life without consent, whether truthful or otherwise, and any violation gives rise to an action for damages. The commercial exploitation of Appellant No.1's unique public persona, family circumstances, and the facts of his ongoing criminal trial — without consent, in a mass-produced feature film declared as 'Inspired by True Events' — is a direct and continuing violation of these constitutionally protected rights.

PART III: BALANCE OF CONVENIENCE — OVERWHELMINGLY IN FAVOUR OF THE APPLICANTS

18. The Supreme Court in Bloomberg Television Production Services India Pvt. Ltd. v. Zee Entertainment Enterprises Ltd. (2024 SCC OnLine SC 426) — the most recent Supreme Court pronouncement on the tripartite test in media injunction suits — held: 'In cases involving infringement of fundamental rights, the court should carefully consider whether monetary compensation after trial would be an adequate remedy. Fundamental rights, by their very nature, cannot always be adequately compensated by a monetary award. In such cases, the balance of convenience would

Wijaya

generally tilt in favour of protecting the fundamental right, irrespective of the commercial interests of the other party.' This is precisely the position in the present case.

19. The balance of convenience overwhelmingly favours the Applicants on the following grounds:

(a) If the injunction is not granted and the film is released, the harm caused to the Applicants' constitutional rights — the right to a fair trial, the right to privacy, and the right to reputation under Article 21 — will be instantaneous, mass-scale, and wholly irreversible.

(b) If the injunction is granted and the Applicants ultimately fail at trial, the Respondents will suffer only a temporary and calculable commercial delay — a loss that is fully quantifiable and compensable in money terms. By contrast, the contamination of the evidentiary environment in S.C. No.1319/2024 and the irreversible mass prejudice to Appellant No.1's right to a fair trial cannot be undone by any monetary award.

(c) The Respondents' financial investment — heavily relied upon by the Ld. Trial Court — was made with full knowledge of the five subsisting protective court orders, the statutory notice served on the CBFC, and the Appellants' assertion of their rights. A party who knowingly makes commercial investments in wilful defiance of binding court orders cannot thereafter invoke equity to protect those investments against the enforcement of those orders. The Respondents approach this Court with unclean hands.

(d) The continuance of the ex-parte injunction of 27.03.2026 maintains the status quo as it existed before the Respondents embarked upon this enterprise. There is no hardship to the Respondents in maintaining the status quo that existed since 27.03.2026 during the pendency of this MFA.

20. The Ld. Trial Court's finding that the balance of convenience tilts in favour of the Respondents because of their commercial investment, and its further finding that monetary compensation would adequately recompense the Applicants, are directly contrary to the Supreme Court's binding holding in *Bloomberg* (supra) and constitute grave errors of law that this Hon'ble Court should correct at the earliest.



**PART IV: IRREPARABLE HARM AND INJURY INCAPABLE OF
MONETARY COMPENSATION**

The Applicants most respectfully submit that the injury that will flow from a failure to grant the stay is of a character that defies all monetary quantification and cannot be remedied by any award of damages, for the following reasons:

**A. Irreversible Contamination of the Evidentiary Environment in
S.C. No.1319/2024**

21. The trial in S.C. No.1319/2024 is live and ongoing on a day-to-day basis before the LVI Additional City Civil and Sessions Judge, Bengaluru. The evidence of prosecution witnesses is being recorded as this application is being filed. The release of a commercially distributed feature film — declaring itself 'Inspired by True Events' and dramatising the prosecution's version of the alleged crime — will inevitably reach mass audiences that may include witnesses, potential jurors in any future context, and persons associated with the trial. The contamination of witness memory, the erosion of the presumption of innocence in the public mind, and the creation of a hostile pre-conviction environment around an undertrial prisoner are injuries of a kind that no court and no monetary decree can reverse or repair once they occur.

B. Irreversible Erosion of the Presumption of Innocence

22. The European Court of Human Rights in *Alленet de Ribemont v. France* (1995) 20 EHRR 557, cited with approval by this Hon'ble Court in W.P. No.7473/2026, held that the presumption of innocence is violated when public authorities or media incite the public to consider an accused person as guilty before the conclusion of trial. A commercially distributed feature film that presents the prosecution's case as 'Inspired by True Events' to millions of viewers constitutes the most powerful and irreversible form of such incitement. The United States Supreme Court in *Sheppard v. Maxwell*, 384 U.S. 333 (1966), equally cited by this Hon'ble Court in W.P. No.7473/2026, held that prejudicial publicity can create a 'carnival atmosphere' around pending criminal proceedings that renders a fair trial impossible. Once such conditions are created by the mass release of the



#1 ~~273~~ ~~297~~ 296

film, no legal or monetary remedy can restore the sanctity of the proceedings.

C. Irreversible Mass Damage to Reputation and Personality

Rights

23. The reputation of a public figure and the commercial value of a distinctively identified public persona — 'D Boss,' 'Challenging Star Darshan' — built over two decades of artistic and public engagement, represents a unique and irreplaceable property right. The association of this persona with a dramatised cinematic portrayal of an alleged murder trial will cause immediate and mass-scale damage to this reputation and personality identity across all platforms and in the public consciousness. This is not damage that can be measured in money and repaired by a decree after trial. As the Supreme Court recognised in Puttaswamy (supra) and R.N. Rajagopal (supra), the right to control how one's personal identity and family circumstances are commercially exploited is a non-derogable fundamental right that cannot be vindicable purely in monetary terms.

D. Rendering of This MFA as Wholly Infructuous

24. If this Hon'ble Court does not grant the ad-interim stay sought, the film 'BOSS' will be released in theatres and/or on OTT platforms before this MFA can be heard on merits. The relief sought in the MFA — restoration of the injunction restraining the release of the film — will become wholly infructuous. A party to whom the law accords a right of appeal would be deprived of the effective benefit of that right if the subject matter of the appeal is rendered infructuous pendente lite. The grant of the stay is therefore essential to preserve the very jurisdiction of this Hon'ble Court to grant effective relief in the MFA.

E. Contempt of Coordinate Court Orders — Permitting the Film Defeats Five Subsisting Orders

25. Five binding judicial orders — including an order of this Hon'ble Court in W.P. No.7473/2026 — have been passed to protect the integrity of the proceedings in S.C. No.1319/2024 and the constitutional rights of the

Vijay Darshan

~~48~~ ~~276~~ ~~292~~ 297

Applicants. The Impugned Order, by vacating the only remaining operative injunction against the film 'BOSS,' renders all five protective orders nugatory. This Hon'ble Court in W.P. No.7473/2026 held at paragraph 22 thereof that the broadcasts relating to the pending proceedings attract 'the mischief of Section 2(c)(ii) and (iii) of the Contempt of Courts Act, 1971.' A full-length commercial feature film dramatising the prosecution's case is an escalation of precisely the same conduct on an exponentially larger scale. Permitting its release in defiance of five subsisting orders would constitute judicial sanction for the erosion of the authority of this Hon'ble Court and of the coordinate courts that have passed the earlier protective orders.

PART V: NO OTHER ADEQUATE OR EFFICACIOUS REMEDY

26. The Applicants submit that no other adequate or efficacious remedy exists:

(a) Any remedy that becomes available only after the film's release — including an injunction against further exhibition — would be wholly inadequate, as the damage to the presumption of innocence, evidentiary environment, and reputation would already have been caused by the initial mass release.

(b) Contempt proceedings, even if initiated and ultimately successful, would not undo the damage caused by mass public exposure to the film's content.

(c) The appeal, even if ultimately allowed, cannot restore the sanctity of the trial in S.C. No.1319/2024 once the film has been released and its portrayal of the prosecution's case has permeated the public consciousness. Prevention is the only efficacious remedy.

PART VI: URGENCY AND GROUNDS FOR EX-PARTE RELIEF

27. The present application requires urgent ex-parte consideration on the following grounds:

(a) The Impugned Order was passed on 02.06.2026. The Applicants are credibly informed that Respondents No.1 and No.2 are actively preparing an immediate release of the film. Any delay in the grant of the stay will render the relief sought in the MFA wholly infructuous.

Vijay → Darlan

(b) The ex-parte ad-interim injunction of 27.03.2026 constituted the only operative judicial barrier to the film's release. The vacation of that order by the Impugned Order has removed that barrier. The status quo that was protected for over two months is now exposed to immediate and irreversible disruption.

(c) Notice to Respondents No.1 and No.2 prior to the grant of the stay would, in the very nature of things, create an opportunity for them to advance the release of the film to defeat the stay. Ex-parte relief is therefore the only effective remedy.

WHEREFORE It is humbly prayed that this Hon'ble Court may be pleased to allow this IA in the interest of justice and equity.

Solemnly sworn to before me on
this, the ____ day of
____ 2026, at
Bangalore, by the aforesaid
Smt. Vijayalakshmi Darshan.

Identified by me:

ADVOCATE

Vijayalakshmi Darshan
DEPONENT

NOTARY