

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

YUPPTV USA INC.,

Plaintiff,

v.

HARPREET SINGH RANDHAWA,
VOIS INC., 2144644 ALBERTA LTD.,
SERVER CENTER LTD., RHYSLEY
PVT. LTD. (formerly RHYSLEY
COUTURE PVT. LTD.), DATACAMP
LIMITED (d/b/a CDN77) as the CDN
provider, ALLSTREAM BUSINESS,
INC., ALLSTREAM BUSINESS USA,
LLC, INFOMIR.EU and INFOMIR
USA, LLC.

Defendants.

Civ. No. _____

COMPLAINT

Plaintiff YuppTV USA, Inc. (“YuppTV” or “Plaintiff”), by and through its undersigned attorneys, files this complaint (“Complaint”) against Harpreet Singh Randhawa, Vois Inc., 2144644 Alberta Ltd., Server Center Ltd., Rhysley Pvt. Ltd. (formerly Rhysley Couture Pvt. Ltd.), DataCamp Limited (d/b/a CDN77), Allstream Business, Inc., Allstream Business USA, LLC, Infomir USA, LLC, and Infomir.eu (collectively, “Defendants”), for infringing Plaintiff’s rights under the Copyright Act (17 U.S.C. § 101 et seq.) and for violating the Digital Millennium Copyright Act (§ 1201 *et seq.*) (“DMCA”), alleging as follows:

NATURE OF THE ACTION

1. This copyright infringement action arises out of a collection of global pirate Internet Protocol television (IPTV) services that are or have been illegally marketed to customers in the Middle District of Pennsylvania, and throughout the United States and Canada, under various brand names including, but not limited to, Boss IPTV, Guru IPTV, Tashan IPTV, Brampton IPTV, Vois IPTV, Indian IPTV, Punjabi IPTV, Edmonton IPTV, Boss Entertainment IPTV and UltrastreamTV (the “Boss IPTV Platforms” or “Infringing Services”). These services may be rebranded, renamed, discontinued, or expanded from time to time in an effort to evade detection and legal enforcement— a common tactic used by pirate operations engaged in content infringement.

2. Plaintiff YuppTV USA, Inc., a Georgia corporation, provides over- the-top (“OTT”) audio-visual South Asian content through its online Platform to registered subscribers – most of whom are non-resident individuals of Indian national origin (“NRIs”).

3. YuppTV is a registered licensee of various Indian television networks, aggregating content from several broadcasters such as ETV, STAR, Sun, Sony and Indiacast, and distributing this content to its subscribers worldwide.

4. Defendant Harpreet Singh Randhawa (the “Direct Infringer” or “Mr. Randhawa”) manages and operates the Boss IPTV Platforms and, by doing so, knowingly

and unlawfully transmits television channels and the copyrighted programs (the “Works”) on those channels (collectively, “Pirated Content”) inside the United States and Canada.

5. The Pirated Content (i.e., the television channels and the Works broadcasted or streamed on those channels) originates from India and is (or was) licensed to YuppTV in the United States and Canada.

6. Prior to 2020 and at great expense, YuppTV began conducting a widespread investigation into Mr. Randhawa and his illicit business activities. Throughout the course of this investigation, YuppTV observed Mr. Randhawa wielding his vast enterprise to infringe repeatedly upon YuppTV’s licensed rights.

7. Boss IPTV Platforms superficially appear and feel very similar to well-known licensed OTT streaming service providers such as Netflix, Amazon Prime, Hulu, and YuppTV. Boss IPTV Platforms allow customers to search for copyrighted material based upon popularity, genre, or other categories. These Platforms offer customers access to exclusive television channels such as several popular channels in India owned by Star India Private Limited (“STAR”). Like licensed OTT providers, Boss IPTV Platforms offer the capability to stream content via Android/Linux-based set-top boxes (e.g., MAG devices) or, alternatively through use of a dedicated app installed on smart TVs, smartphones, and/or tablets.

8. Mr. Randhawa continuously and illegally streams these copyrighted programs through the Boss IPTV Platforms directly into the homes of customers living in the United States and Canada (the “Service Users” or “Subscribers”)

9. Service Users access Boss IPTV Platforms through apps on digital TV “MAG set- top boxes” (or the dedicated app) utilizing the Android and Linux operating systems, which Mr. Randhawa procures from Infomir.eu (“Infomir”) and its affiliate in the United States, Infomir.us (a/k/a Infomir USA, LLC).

10. Mr. Randhawa markets and sells these “MAG set-top boxes” through various sales channels, including but not limited to the following websites:

- (a) <https://www.bossiptv.xyz>
- (b) <https://voisiptv.com>
- (c) <https://tashantv.net>
- (d) <https://www.guruiptv.xyz>
- (e) <https://www.indianiptv.net>
- (f) <https://www.punjabiipvtv.xyz>
- (g) <https://www.bramptoniptv.net>
- (h) <https://www.edmontoniptv.xyz>
- (i) <https://ultrastreamtv.net>
- (j) <https://servercenter.ca>

These various sales channels facilitate the distribution and sale of the “MAG set-top boxes”, enabling Service Users to access the Boss IPTV services.

11. Mr. Randhawa promotes Boss IPTV Platforms on an array of online platforms, including but not limited to Facebook, Instagram, website advertisements, Google Blogs, and “X” (formerly known as “Twitter”).

12. Boss IPTV Platforms are fundamentally different from YuppTV and other licensed OTT providers, however. Boss IPTV Platforms do not have authorization from YuppTV (or any of the content providers that lawfully contract with YuppTV) to stream the Pirated Content to customers living in the United States and Canada.

13. For his own profit and that of the entities he controls, Mr. Randhawa and Boss IPTV Platforms are displacing YuppTV’s legitimate service and stealing its revenue and profits.

14. YuppTV’s investigation culminated in March 2021 when it submitted a complaint to the cyber-crime branch of Faridabad police in India. YuppTV explained that Mr. Randhawa used, *inter alia*, Rhysley Pvt. Ltd. (“Rhysley”) to perpetrate the ongoing infringement by Boss IPTV Platforms. Indian police raided Rhysley and arrested six (6) employees, including Sumit Sharma, the India Director of Rhysley, and Harminder Sandhu, a key employee of Server Center Ltd. Canada (“Server Center”).

15. The criminal investigation by Indian Police involved the Digital Investigation, Training, and Analysis Centre (“DITAC”), a specialized Indian government

unit that enhances police capabilities in addressing cybercrimes. From the police raid on Rhysley's facilities in India, DITAC gathered information and collected data concerning how Boss IPTV Services (i) profits from selling live TV and content programming pirated from India and international markets, and (ii) streams this Pirated Content illegally to earn its profits.

16. By operating without the necessary licenses, Mr. Randhawa and Boss IPTV Platforms blatantly violate the Copyright Act and confer on themselves unfair and unlawful advantages when compared with licensed OTT service providers in the marketplace, like YuppTV. Because Boss IPTV Platforms and Mr. Randhawa do not pay copyright owners for the use of copyrighted material, they are able to offer prices that undercut licensed OTT services and charge ridiculously low fees for daily access to STAR and other Pirated Content. Mr. Randhawa uses below-market pricing to sell Boss IPTV Platforms, and to illegitimately transfer to himself and to entities he controls both revenue and profits that legitimately belong to YuppTV and to individual content owners.

17. "This has been a major problem for a platform like YuppTV because we are a leader in NRI space," said Uday Reddy, the CEO of YuppTV. "The overall broadcast industry is losing somewhere around 200-300 million [US] dollars of revenue each year" from the actions of pirates like Mr. Randhawa and his Boss IPTV Platforms.

18. Boss IPTV Platforms deliver the Pirated Content to Service Users from a vast web of computer servers located around the world. Mr. Randhawa actively works to conceal his identity and to avoid copyright enforcement by regularly moving the servers housing Boss IPTV Platforms to different hosting companies in different countries. As of the filing of this Complaint, Mr. Randhawa operates the Boss IPTV Platforms using servers hosted by, *inter alia*, DataCamp Limited (d/b/a DataPacket/CDN77), NovoServe LLC, WorldStream B.V., and Allstream Inc. The domains associated with these platforms are registered through GoDaddy Inc. and NameSilo LLC. PayPal, Inc. and Stripe, Inc. provide payment processing services. This list is not necessarily exhaustive. Other services may be facilitating the activity of Boss IPTV Platforms.

19. An international network of secondary infringers work collaboratively with Mr. Randhawa and the entities operating Boss IPTV Platforms to promote and enable access to Boss IPTV Platforms in the United States and Canada.

20. Infomir, for example, manufactures the “MAG set-top boxes” used by Boss IPTV Platforms and provides “Ministra Pro,” a middleware platform that integrates with “MAG set-top boxes” to provide the infrastructure for IPTV/OTT services to connect with Boss IPTV Platforms inside the United States and Canada.

21. “Ministra Pro” essentially acts as a software on top of the “MAG set-top box” hardware, enabling Service Users to manage how content is delivered, customize the user interface, and handle features like remote control, billing, and content protection.

22. The secondary infringers act to (i) enable the infringing activity in this district and throughout the United States and Canada; (ii) derive direct financial benefit from that illegal activity; and (iii) decline to exercise their ability to stop the infringing activity.

23. Working in concert, Defendants reap substantial revenue and profits by infringing YuppTV's licensed rights, and they continue to do so despite more than five years of investigation and enforcement efforts by Indian police and YuppTV. Without intervention from this Court in the form a permanent injunction and significant monetary damages, Defendants will likely continue to promote their illegal scheme with impunity.

PARTIES

24. Plaintiff YuppTV USA, Inc. is a corporation duly incorporated under the laws of the State of Georgia with its principal place of business in Alpharetta, Georgia. YuppTV is one of the largest and most popular OTT service provider of Indian-language television programming in the world. YuppTV holds non-exclusive contractual rights with content providers (like STAR) to distribute Indian-language television programming in the United States and Canada.

25. Defendant Harpreet Singh Randhawa is the principal owner of Boss IPTV and is responsible for creating, controlling and operating Boss IPTV Services worldwide. He is an adult individual residing in Calgary, Canada.

26. Defendant Vois, Inc., is a corporation duly incorporated under the laws of Canada with its principal place of business in Calgary, Canada. It is owned and operated by Mr. Randhawa and an integral part of Mr. Randhawa's criminal enterprise.

27. Defendant 2144644 Alberta Ltd., is a corporation duly incorporated under the laws of Canada with its principal place of business in Calgary, Canada. It is owned and operated by Mr. Randhawa and an integral part of Mr. Randhawa's criminal enterprise.

28. Defendant Server Center Ltd., is a corporation duly incorporated under the laws of Canada with its principal place of business in Calgary, Canada. It is owned and operated by Mr. Randhawa and an integral part of Mr. Randhawa's criminal enterprise.

29. Defendant Rhysley Pvt. Ltd. (formerly Rhysley Couture Pvt. Ltd.), is a corporation duly incorporated under the laws of India with its principal place of business in Faridabad, India. It is owned and operated by Mr. Randhawa and an integral part of Mr. Randhawa's criminal enterprise. In particular, Rhysley's financial statements specify that Defendants Server Center Ltd. and 2144644 Alberta Ltd. are related entities, and that Mr. Randhawa sits on the company's board of directors.

30. Defendant DataCamp Limited (d/b/a CDN77 and/or Datapacket) is a company organized under United Kingdom law, with its principal place of business located at 207 Regent Street, London W1B 3HH, England. DataCamp does business as CDN77 and Datapacket, operating various websites from which it advertises and offers

services under these tradenames including DataCamp.co.uk, CDN77.com, and Datapacket.com. These websites all identify DataCamp Limited as responsible for the services offered.

31. Allstream Business, Inc. (“Allstream”) is a company organized under the laws of Canada, with its principal place of business located in Mississauga, Ontario, Canada. Allstream is a wholly-owned subsidiary of Zayo Group Holdings.

32. Allstream Business USA, LLC (“Allstream USA”) is a limited liability company organized under the laws of the State of Delaware, with its principal place of business located in Vancouver, WA, United States. Allstream USA is also a wholly-owned subsidiary of Zayo Group Holding.

33. Infomir.eu is a company organized under Ukraine law, with its principal place of business located in Estonia, Tallinn, 10143; Kesklinna Linnaosa, Ravala pst. 8. It manufactures “MAG set-top” boxes for use with Boss IPTV Platforms – otherwise known as MAG Devices – to customers inside the United States and Canada. The “MAG set-top” boxes that Infomir.eu manufactures and sells are preloaded with “Ministra Pro” Middleware, which is the software application used by Boss IPTV Platforms.

34. Infomir, LLC (a/k/a Infomir USA) is, upon information and belief, a company organized under the laws of the State of Delaware, with its principal place of business located at 174 Bay 49th Street, Brooklyn, NY 11214, United States. Infomir

distributes the “MAG set-top boxes” and “Ministra Pro” Middleware to Boss IPTV Platforms and the related entities owned and/or operated by Mr. Randhawa.

JURISDICTION AND VENUE

35. This Court has subject matter jurisdiction over Plaintiff’s claims pursuant to 28 U.S.C. §§ 1331 and 1338 because they arise under the Copyright Act, 17 U.S.C. §§ 101 *et seq.*

36. Personal jurisdiction over Defendants is proper because they have each purposefully directed their conduct towards, and have purposefully availed themselves of the privileges of conducting business activities within, the Commonwealth of Pennsylvania (and the Middle District of Pennsylvania) by, among other things, transmitting, selling and supplying, and offering to transmit, sell and supply, the Boss IPTV Services and/or Boss IPTV digital TV “set- top box” devices to customers and/or business partners in the Pennsylvania generally and the Middle District of Pennsylvania, causing injury to YuppTV in this Commonwealth and in this District.

37. Alternatively, to the extent that Mr. Randhawa or any other Defendant is not subject to personal jurisdiction in any state’s courts of general jurisdiction, personal jurisdiction is proper because each derives substantial revenue from residents of the United States as a whole, and they are therefore each subject to personal jurisdiction pursuant to Fed. R. Civ. P. 4(k)(2).

38. Venue is proper in this District under 28 U.S.C. §§ 1391(b)(2) because a substantial part of the events giving rise to YuppTV's claims occurred in this judicial district and under 28 U.S.C. § 1391(b)(3) because Defendants are subject to personal jurisdiction in this judicial district.

39. Venue is also proper in this Court under 28 U.S.C. § 1400(a) because the case involves violations of the Copyright Act.

FACTS

YuppTV's Business as an OTT Service Provider

40. Founded in 2006, YuppTV has become one of the world's largest OTT internet-based service providers for Indian content, offering more than 250+ television channels, (8) languages.

41. Subscribers of YuppTV use the platform to access YuppTV's available content conveniently anytime and anywhere, through multiple screens and a variety of devices - Connected TVs, Internet "set-top box", Smart Blu-ray Player, PCs, Smart Phones and Tablets.

42. YuppTV offers subscribers an umbrella of entertainment services, including, *inter alia*, live television and broadcaster based OTT apps such as SunNXT, SonyLIV, and Aha.

43. YuppTV contracted for and purchased rights for the Indian channels distributed on its platforms in the United States & Canada from channel owners and their

agents, including: Eenadu Television Pvt. Ltd.; Arha Media & Broadcasting Pvt. Ltd.; Sun TV Network Ltd.; Sony Pictures Networks India Pvt. Ltd. (changed to Culver Max Entertainment Pvt. Ltd.); IndiaCast UK Ltd.; and STAR India Pvt. Ltd. (collectively the “Networks”).

44. Through the contractual relationship with the Networks, YuppTV offers access to certain television channels (the “Protected Channels”). These Protected Channels include, *inter alia*, the following: ETV HD; ETV Plus; ETV Cinema; ETV Abhiruchi; ETV Life; ETV Andhra Pradesh; ETV Telangana; Colors (Asia Pacific Feed); Rishtey Asia; Rishtey Cineplex; News18 India (International Feed); MTV (International Feed); Colors Super; ETV Telugu; ETV AP; Colors Marathi; Colors Kannada; Colors Bangla; Colors Gujarati; STAR Plus; STAR Bharat; Vijay TV; Asianet; Asianet Plus; Asianet Movies; STAR Maa TV; STAR Maa Movies; STAR Maa Gold; STAR Maa Music; STAR Jalsha; STAR Pravah; STAR Suvarna; Sun TV; KTV; Adithya TV; Sun Music; Gemini TV; Gemini Movies; Gemini Comedy; Surya TV; Surya Movies; Udaya TV. A true and correct copy of a list of Protected Channels covered by YuppTV’s License Agreements with the Networks is attached hereto as **Exhibit A**.

45. YuppTV entered into fully executed written licensing agreements with each of the Networks granting YuppTV the right to transmit, distribute, and publicly perform the Protected Channels and the copyrighted programs that air on the Protected Channels in the United States and Canada through YuppTV’s OTT internet-based platform.

46. The programs that make up the Protected Channels are non-United States works, and registration with the United States Copyright Office is not a prerequisite to filing a copyright infringement action with respect to these works. *See* 17 U.S.C. §§ 101 and 411.

Boss IPTV Services and Direct Infringement

47. Beginning on or about 2011, Harpreet Singh Randhawa created the Boss IPTV Platforms and marketed an inexpensive “MAG set-top box” platform that provided unlicensed Indian entertainment content to consumers of Indian descent living abroad – particularly, those residing in the United States and Canada.

48. Boss IPTV Platforms illegally deliver unlicensed content to subscribers through Internet Protocol television (“IPTV”) – otherwise known as TV over broadband.

49. Like other IPTV providers, Boss IPTV offers (a) live television streamed over the Internet (multicast) and (b) video on demand services, which allow Service Users to watch or replay content (unicast).

50. To avoid prosecution and paying money damages, Mr. Randhawa’s Boss IPTV has branded and re-branded itself using several different trade names. The Boss IPTV Platforms include, but are not limited to the following: Boss IPTV, Guru IPTV, Tashan IPTV, Brampton IPTV, Vois IPTV, Indian IPTV, Punjabi IPTV, Edmonton IPTV, Boss Entertainment IPTV and UltrastreamTV. Each trade name markets and

illegally provides the same services to the same customer base. And each trade name is owned and operated by Mr. Randhawa and/or Defendant entities named in this suit that Mr. Randhawa controls.

51. YuppTV has investigated the business and practices of Mr. Randhawa's Boss IPTV Platforms since learning of the Platforms' existence.

52. DITAC – the Indian government's specialized unit on cyber crimes – has collected information and data relating to the activities of Boss IPTV Platforms based upon a formal complaint submitted by YuppTV on March 9, 2021.

53. DITAC extracted approximately two (2) terabytes (TB) of data from thirteen (13) computer systems seized by Indian police during the March 10, 2021 raid at Rhysley's offices. This data was submitted to the Indian Cyber Crime unit in 2024, and YuppTV obtained a certified copy via the Faridabad Court.

54. DITAC's data gathering, and YuppTV's ongoing investigatory efforts, uncovered evidence that Boss IPTV Platforms are illegally engaged in widespread fraud, copyright infringement and piracy. A true and correct copy of (i) a selection of the DITAC forensic evidence illustrating infringement by the Boss IPTV Platforms is attached here to as **Exhibit B-1**, and (ii) a Piracy Report prepared internally by YuppTV based upon this forensic evidence is attached hereto as **Exhibit B-2**.

55. Upon analysis, YuppTV identified extensive materials—including emails, marketing and sales data, financial records, and shipping labels—spanning from 2011 to

March 2021. This evidence indicates the involvement of Boss IPTV Platforms in unauthorized infringement since at least 2011.

56. Boss IPTV Platforms intercept and pirate content illegally from Networks, YuppTV and other content creators.

57. Along with the Boss IPTV Platforms, Mr. Randhawa also owns and operates the following entities: Vois Inc., 2144644 Alberta Ltd., Server Center Ltd., and Rhysley Pvt. Ltd. (formerly Rhysley Couture Pvt. Ltd.). Mr. Randhawa uses these entities and the Boss IPTV Platforms to support and further his illicit enterprise (all entities collectively, “Boss IPTV Cartel” or “Direct Infringers”).

58. Server Center Ltd., a Canadian entity, is the ostensible parent company for all entities comprising Mr. Randhawa’s criminal enterprise.

59. YuppTV’s investigation traced and monitored the flow of funds from and between the various entities involved in the Boss IPTV Cartel.

60. 2144644 Alberta Ltd. and Server Center Ltd. transfer substantial funds directly to Rhysley, which then funnels the Boss IPTV Cartel’s illegal profits directly into Mr. Randhawa’s bank accounts situated in India and Canada.

61. The information gathered from DITAC reveals that a substantial portion of the payments to Rhysley originated from Server Center Ltd.

62. Moreover, 2144644 Alberta Ltd., Server Center Ltd. and Vois, Inc. share the same physical address location in Canada, which further demonstrates coordinated operations.

63. The Boss IPTV Platforms utilize the same chat provider, hosting provider, and IP address across their services. The chat software is instrumental in collecting customer information and engaging users, thereby facilitating the promotion and sale of Boss IPTV set-top boxes.

Chat Provider Website	ISP	Hosting Provider	IP Address
https://eazee.xyz	Server Center Limited	Allstream Business, Inc. (Zayo Group, LLC)	209.153.233.120:443

64. Specifically, the Boss IPTV Cartel illegally and without proper intellectual property licenses provides Service Users with access to the same television channels, programs and films – the Works protected by copyright law – that lawfully appear on YuppTV’s platform.

65. Unlike YuppTV, the Boss IPTV Cartel did not enter into license agreements with the Networks (or other content creators) and, consequently, has no right or authority to market access to this content to consumers.

66. The Boss IPTV Cartel uses illicit means (i) to gain access to the Pirated Content (including the Works) for which YuppTV holds contractual licenses, and (ii) to market and sell the Boss IPTV Platforms that provide consumers with the Pirated

Content (including the Works) through streaming, on-demand services and live television for prices well below market value.

67. The following advertisement from Guru IPTV illustrates the nature of the content and the services that the Boss IPTV Cartel markets to Service Users living in the United States and Canada:

GURU IPTV: Your one-stop entertainment destination!

GURU IPTV, one of the most popular IPTV service providers in the USA and Canada is now successfully catering to diverse tastes and preferences of tens of millions of Indians staying offshore with its revamped offering.

It enjoys immense popularity amongst its users and is consistently ranking among the most subscribed IPTV services in various states, provinces, and territories of Canada and the United States.

This IPTV is a full-fledged one-stop entertainment platform where you can stream music videos, movies, TV shows, sports, news, and lots more. It offers India-specific content with crystal clear picture quality in English, Hindi, Bengali, Marathi, Gujarati, Punjabi, Tamil, Telugu, Kannada, Urdu, Malayalam and various other languages.

Subscribers can now have access to live sports and catch-up videos on boxing, cricket, football, racing, wrestling, etc. GURU IPTV is compatible with Wi-Fi, easy to set-up and makes browsing content of all shapes, sizes, and formats more convenient.

GURU IPTV boasts of:

- 50000+ Happy Customers
- 600+ Total Channels
- 600+ HD & SD live South Asian channels
- 140+HD Channels
- 100+Live HD Hindi Channels
- 250+Regional Channels
- World's Biggest Movie Library with 100000+Movies

Unique Features You Won't Get Anywhere Else!

- Customized streaming services at pocket-friendly prices
- Pause or rewind live TV
- Rewind live HD channels up to 7 days
- No buffering and freezing during live streaming
- Enjoy web-chatting and Youtube on TV
- Wi-Fi Compatibility
- Interactive tools to check the weather, currency rates, Google maps, Picasa and tons of other applications
- Equipped with a Personal Video Recorder that enables you to record your favorite programs and watch later
- 24*7*365 customer support

Scouting for affordable entertainment?

GURU IPTV is your best bet!

Sign-up now to receive a 3-month subscription free! Buy now to get flat \$30 off!

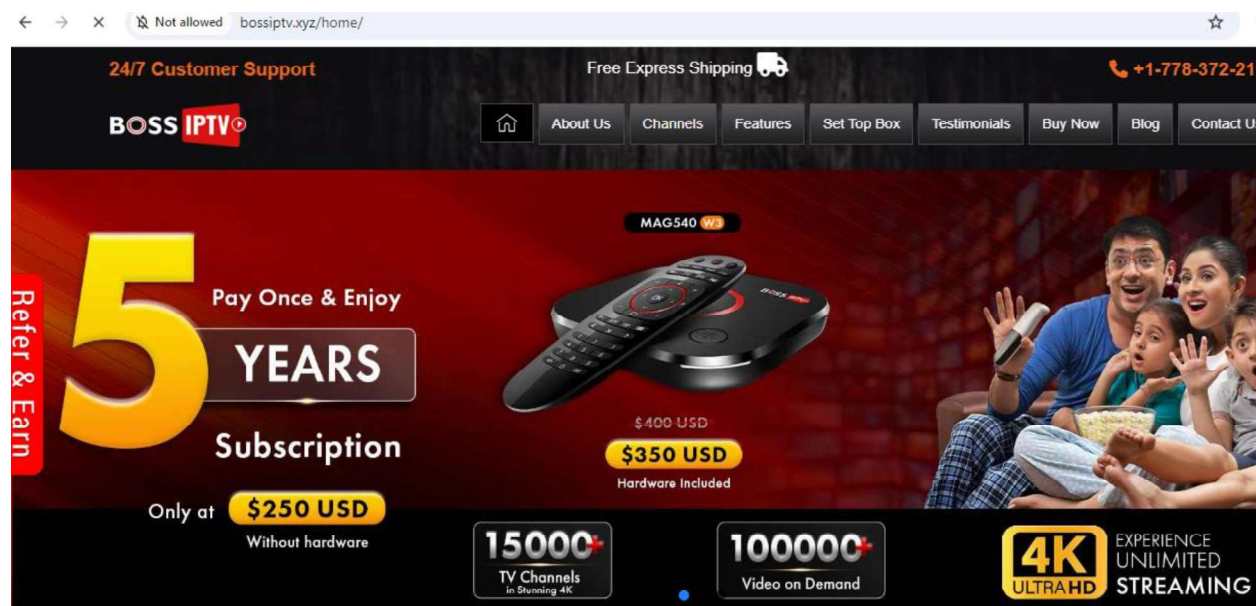
68. Like other IPTV platforms, the Boss IPTV Cartel requires Service Users to purchase and configure a “MAG set-top box” or dedicated app (for use on smart TVs, smartphones, and/or tablets) in order to use the Boss IPTV Platforms.

69. The Boss IPTV Cartel uses Infomir.eu, a Ukrainian-based company, to manufacture the “MAG set-top boxes” – also known as MAG Devices.

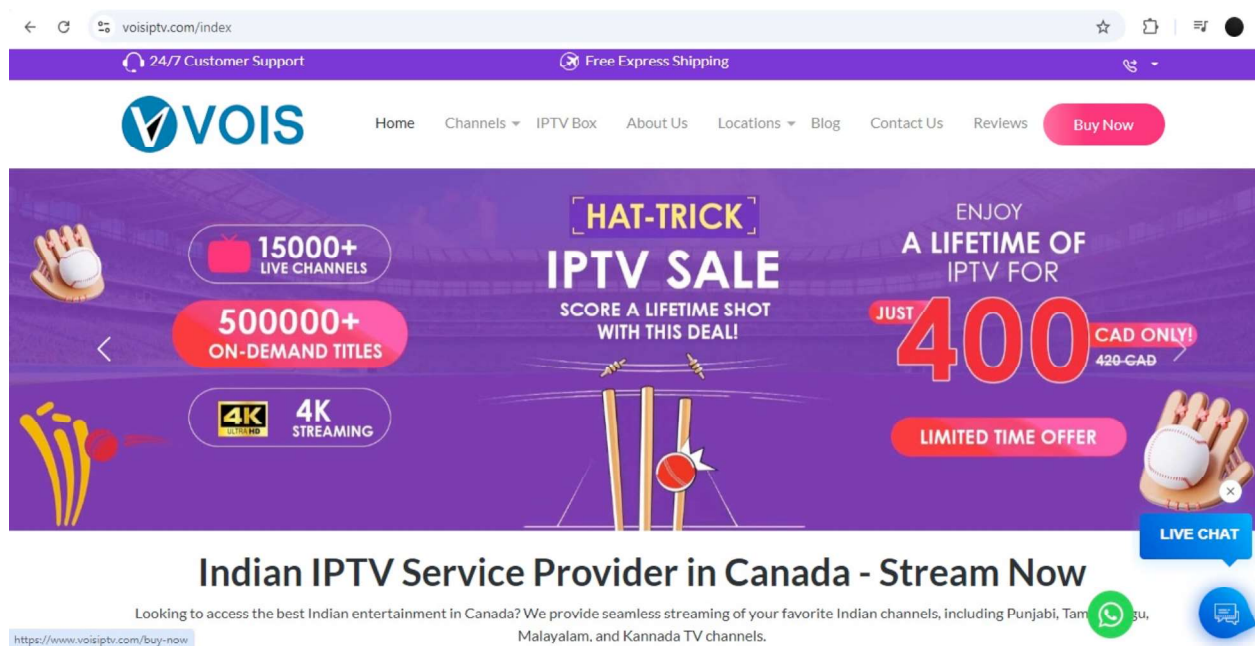
70. The Boss IPTV Cartel then acquires the “MAG set top boxes,” loaded with the “Ministra Pro” Middleware, from Infomir USA, a domestic affiliate of Infomir.eu.

71. After the devices are procured from Infomir USA, the Boss IPTV Cartel directly distributes the “MAG set-top boxes” (preinstalled with “Ministra Pro” Middleware) to Service Users who have subscribed to Boss IPTV Platforms. The Cartel uses various channels to deliver the “MAG set-top boxes” directly to the Service Users, including multiple websites and social media platforms.

72. The following screenshot captured from the website of a Boss IPTV Platform delineates the basic package that the Cartel’s Boss IPTV Platforms offer to subscribers – pay a one-time flat fee that includes the “MAG set-top box” and a 5-year subscription.



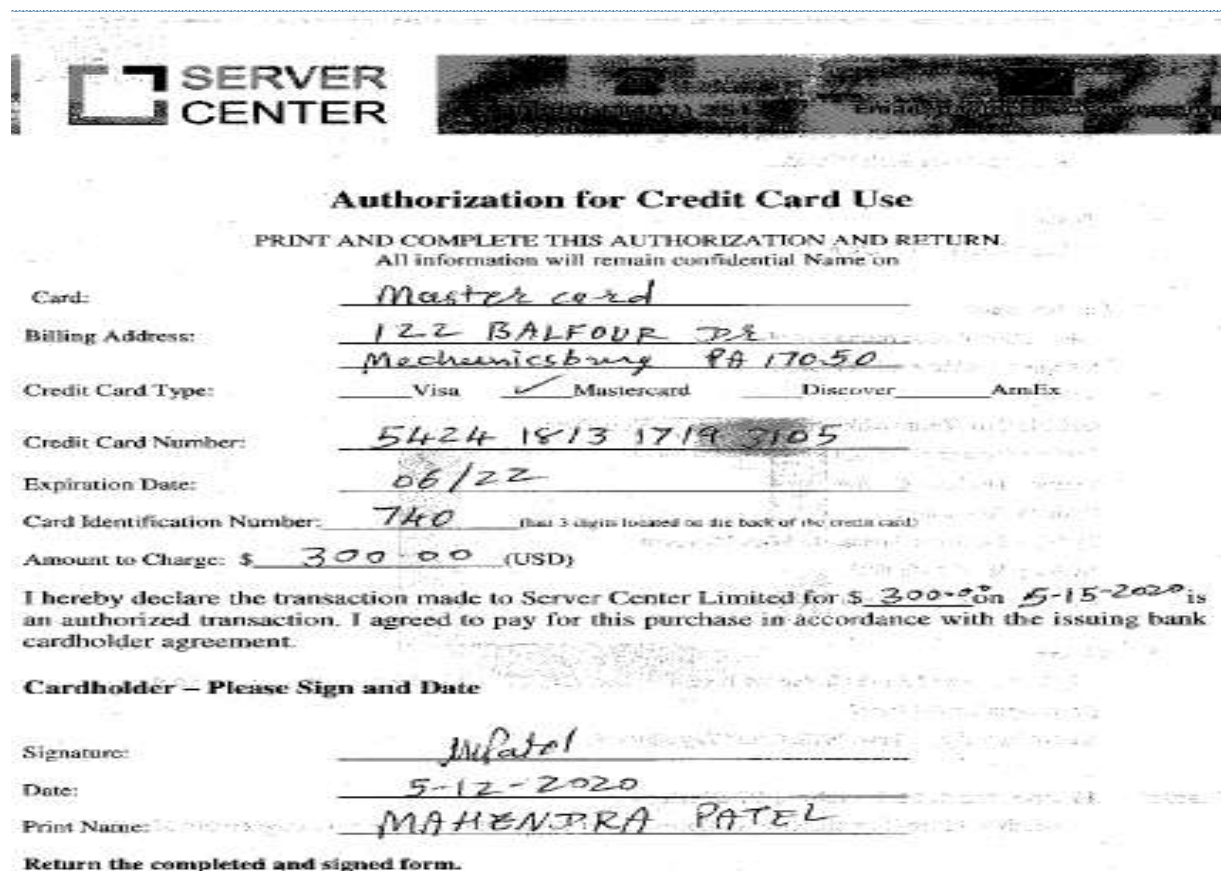
73. Recently, YuppTV’s investigation found that certain Boss IPTV Platforms have begun advertising a “Lifetime of IPTV [Subscription] for Just \$400 CAD.” Offering lifetime access to IPTV services is a typical characteristic of unauthorized providers, such as those platforms marketed by the Boss IPTV Cartel.



74. The investigation by YuppTV – utilizing DITAC’s data gathering – has revealed that Boss IPTV Platforms regularly sell more than 1,400 “MAG set-top boxes” to Service Users in a one-month period. A true and correct list of the monthly sales by the Boss IPTV Cartel, across all brands, is attached hereto as **Exhibit C**.

75. YuppTV has created a database of shipping labels from the Boss IPTV Cartel to Service Users of the Boss IPTV Platforms residing in the United States and Canada. These Service Users tender their subscription payment to Server Center Ltd. – or one of the other Boss IPTV Cartel entities – and receive a “MAG set-top box” shipped to their specified residence.

76. The following is an example of a shipping label used to deliver a “MAG set-top box” to a Service User of a Boss IPTV Platform, named “Mahendra Patel” who resides in Mechanicsburg, Pennsylvania:



SERVER CENTER

Authorization for Credit Card Use

PRINT AND COMPLETE THIS AUTHORIZATION AND RETURN.
All information will remain confidential Name on

Card: Master card

Billing Address: 122 BALFOUR DR
Mechanicsburg PA 17050

Credit Card Type: Visa ☒ Mastercard ☐ Discover ☐ AmEx

Credit Card Number: 5424 1813 1719 3105

Expiration Date: 06/22

Card Identification Number: 740 (last 3 digits located on the back of the credit card)

Amount to Charge: \$ 300.00 (USD)

I hereby declare the transaction made to Server Center Limited for \$ 300.00 on 5-15-2020 is an authorized transaction. I agreed to pay for this purchase in accordance with the issuing bank cardholder agreement.

Cardholder – Please Sign and Date

Signature: M Patel

Date: 5-12-2020

Print Name: MAHENDRA PATEL

Return the completed and signed form.

77. The Boss IPTV Cartel ships new “MAG set-top boxes” into the United States and Canada regularly. This includes shipments throughout the Commonwealth of Pennsylvania and, in particular, the Middle District of Pennsylvania.

78. Unlike YuppTV, the Cartel and Mr. Randhawa do not pay to license the Pirated Content from the Networks and/or the content creators in order to host and distribute the Pirated Content to the subscribers of the various Boss IPTV Platforms without abridging U.S. intellectual property law. Consequently, the Boss IPTV Cartel is able to charge consumers below-market rates for the Pirated Content, stealing both revenue and profits from YuppTV.

79. Several Networks such as ETV, STAR and Indiacast authorized YuppTV (“YuppTV Authorization Letters”) to pursue legal action against the Boss IPTV Cartel for its unlawful piracy of protected Content available on the YuppTV platform through streaming and live television. A true and correct copy of the YuppTV Authorization Letters from the Networks to YuppTV are attached here to as **Exhibit D**.

80. YuppTV is a licensee and rights holder, which is authorized to publicly perform and disseminate the television channels and the copyrighted materials (including the Works) owned and/or controlled by the Networks to subscribers of the YuppTV platform.

81. YuppTV's revenues and profits are tied to its ability to successfully market the television channels and the copyrighted materials licensed through the Networks (and content providers).

82. Theft of these television channels and copyrighted materials – that is, the Pirated Content by the Boss IPTV Platforms – damages YuppTV and diminishes YuppTV's economic prospects.

83. The Pirated Content by the Boss IPTV Platforms displaces the market available customers YuppTV could legitimately acquire were the Pirated Content not offered illegally.

84. As a result of the Boss IPTV Cartel's actions and its illicit business enterprise, YuppTV has lost hundreds of millions of dollars in revenues and related profits. As long as the Boss IPTV Cartel continues to operate, YuppTV's damages continue to accrue.

DataCamp Knowingly Provides Boss IPTV Platforms with the Means to Continue Pirating YuppTV's Content

85. A content delivery network ("CDN") is a geographically distributed network of datacenters and computer servers designed to transmit content over the Internet with high efficiency and peak performance.

86. Boss IPTV Platforms, as unauthorized IPTV streaming services, depend on third-party CDNs to deliver Pirated Content to their subscribers. Boss IPTV Platforms could not operate without these CDNs.

87. DataCamp provides CDN services to Boss IPTV Platforms, and materially assists these Boss IPTV Platforms in delivering the Pirated Content – that is the Works and copyrighted material airing on the Protected Channels specified in the Network License Agreements, and ultimately licensed to YuppTV.

88. The Boss IPTV Platforms rely on DataCamp’s CDN services in order to transmit the Pirated Content (the Works and copyrighted material airing on the Protected Channels and properly licensed to YuppTV) to their Service Users, and therefore to operate the Boss IPTV Cartel enterprise.

89. DataCamp offers end-to-end streaming assistance to Boss IPTV Platforms, including assisting them with transcoding and delivering the Pirated Content (including the Works and copyrighted material airing on the Protected Channels) in HD over the internet; concealing the identities and IP addresses of the operators of the Boss IPTV Platforms; and improving the speed, reliability, and overall quality of the content delivery services (“DataCamp CDN”).

90. The DataCamp CDN brings content to the end user, and allows unauthorized services like the Boss IPTV Platforms to market high quality visual and audio transmissions at a fraction of the cost.

91. For example, the DataCamp CDN contains caching servers to accelerate load times and reduce bandwidth consumption. Each of DataCamp’s caching servers typically holds multiple storage drives with large amounts of computer memory or RAM

to cache the content of the Boss IPTV Platforms and seamlessly deliver it to their subscription Service Users.

92. DataCamp positions its servers closer in geographical proximity to end users of its content and thus reduces the propagation time of data being transmitted to subscription Service Users of Boss IPTV Platforms.

93. YuppTV has identified two CDN server locations that DataCamp uses to bring content offered by Boss IPTV Platforms to end users in the United States and Canada:

- (a) **LGA1 – Downtown NYC Data Center**, which is located at the following physical address: 60 Hudson Street, Suite #1903, New York, NY 10013; and
- (b) **SEA1 – Downtown Seattle Data Center**, which is located at the following physical address: 2001 6th Ave, 12th Floor, Suite #12500, Seattle, WA 98109.

94. Both centers are operated by DataBank Holdings, Ltd., the headquarters of which is located at 400 South Akard St., Suite 100, Dallas, TX 75202

95. DataBank Holdings, Ltd. is an affiliate of DataCamp according to the company's website. (<https://www.databank.com/solutions/interconnection-marketplace/datacamp-limited/>).

96. DataCamp's CDN, therefore, allows the Boss IPTV Platforms to serve Boss IPTV Service Users with video files from the geographically closest server location rather than from the point of origin, which translates into a faster and consequently smoother video distribution and an improved customer experiences for the customers of Boss IPTV who are receiving the Pirated Content. DataCamp's CDN, then, is a critical part of the Boss IPTV Cartel's distribution mechanism and its corresponding scheme to deprive YuppTV of legitimate revenue.

97. DataCamp transmits the Pirated Content (the Works and copyrighted material) properly aired on the Protected Channels (and streamed from YuppTV and/or broadcast by the Networks) through the Boss IPTV Platforms to subscription Service Users. This constitutes a material contribution to the direct infringement perpetrated by the Boss IPTV Platforms.

98. DataCamp also provides additional services that substantially assist the Pirate Services' infringement.

99. DataCamp offers the Boss IPTV Cartel and Boss IPTV Platforms the ability to monetize their theft of the Pirated Content (including the Works and Protected Channels) by providing security solutions to shield and encrypt their illegal signal feeds, thus ensuring that only illegal subscription-paying Service Users can view the Works and Protected Channels on Boss IPTV Platforms.

100. DataCamp improves the performance of the Boss IPTV Platforms by reducing the physical distance between Service Users and the Protected Channel streams and improving the server-side infrastructure.

101. For example, DataCamp supplies the Boss IPTV Cartel with load balancing and caching. These optimizations materially increase the quality of the Boss IPTV Platforms' streaming product.

102. Boss IPTV Platforms route the Works on the Protected Channels through DataCamp's CDN instead of the origin servers maintained by the Boss IPTV Cartel.

103. This process conceals the original servers maintained by the Boss IPTV Cartel, which prevents or inhibits YuppTV's efforts in sending DMCA infringement notices directly to the Internet service providers for the Boss IPTV Cartel's servers of origin.

104. YuppTV, nonetheless, has notified DataCamp that Boss IPTV Platforms use its CDNs in the United States to perpetrate infringement of the Pirated Content – that is, the Protected Channels and the Works available properly from YuppTV and the Networks with which YuppTV contracts.

105. Since 2020, YuppTV sent correspondence to DataCamp requesting that DataCamp remove or disable access to the Pirated Content on the DataCamp CDN. Although DataCamp undertook some steps to address YuppTV's complaints regarding

the Pirated Content, it has failed to enact measures sufficient to curtail Boss IPTV's infringement.

106. As a result of DataCamp's refusal to take appropriate measures to stop copyright infringement, Boss IPTV Platforms continue unhindered as DataCamp customers. Boss IPTV Platforms continue to purchase increasing amounts of bandwidth from DataCamp.

107. In 2018, the Motion Picture Association of America observed, "A growing number of globally popular illegal IPTV services use DataCamp infrastructure and services to deliver/distribute their illegal IPTV content to a worldwide audience."¹ This practice continues in 2025 because DataCamp markets its infrastructure to offenders like the Boss IPTV Cartel and its branded Platforms.

108. In fact, DataCamp materially assists Boss IPTV Platforms in its infringement of YuppTV's protected content and the Networks' protected content.

109. DataCamp knows that the Boss IPTV Cartel uses its CDN to transmit the Pirated Content to Boss IPTV's Service Users in the United States and Canada. YuppTV has warned DataCamp that the Boss IPTV Cartel uses its CDN for this purpose.

110. On several occasions since 2020, YuppTV sent DataCamp proper notices under the Digital Millennium Copyright Act. A true and correct copy of YuppTV's

¹ <https://www.motionpictures.org/wp-content/uploads/2018/11/notorious-markets-final.pdf>.

DMCA Notices directed to DataCamp (“DMCA Notice Letters”) are attached hereto as **Exhibit E**.

111. YuppTV’s DMCA Notice Letters demanded that DataCamp remove the Pirated Content because DataCamp’s offering of the Pirated Content violated U.S. copyright laws.

112. To avoid liability for replacing content (or restoring access to content) that is the subject of a takedown request, the DMCA requires service providers like DataCamp to direct that their customers provide a DMCA-compliant counter notice. *See* 17 U.S.C. § 512(g)(3). A DMCA-compliant counter notice must include the name, address, and phone number of the service provider’s customer. *Id.*

113. Contrary to DMCA requirements, DataCamp did not terminate access to the Pirated Content identified in YuppTV’s Notice Letters – nor did DataCamp require its customers to submit DMCA-compliant counter notices, which would have identified all operators of Boss IPTV Platforms to YuppTV.

114. DataCamp customers responsible for providing the Protected Channels and the Works on various Pirate Services did so repeatedly, and continued to do so even after YuppTV complained to DataCamp. These DataCamp customers used the same domain names, and streaming URLs to deliver infringing content for the same Boss IPTV Platforms.

115. Upon receiving YuppTV's Notice Letters, DataCamp failed to respond, responded by indicating it had forwarded YuppTV's notice to the responsible customer to remove the infringing content, or asked for additional information.

116. YuppTV provided further information to DataCamp, documenting the systemic infringement perpetrated by the Boss IPTV Platforms and the Boss IPTV Cartel.

117. DataCamp failed to remove or block the Protected Channels or the Works from being transmitted through its servers and failed to terminate the Boss IPTV Platforms responsible for the infringement, despite receiving YuppTV's Notice Letters and other evidence provided by YuppTV and Networks.

118. DataCamp has benefited financially by allowing Boss IPTV Platforms and the Boss IPTV Cartel to operate across the DataCamp servers, despite DataCamp's knowledge of the Boss IPTV Cartel's continued copyright infringement of the copyrighted content available on YuppTV's Platform and DataCamp's criticality to the distribution of that infringing content.

119. DataCamp, consequently, is ineligible for safe harbor under the DMCA. DataCamp failed to terminate the Boss IPTV Platforms as repeat infringers using the DataCamp CDN and failed to designate an agent with the United States Copyright Office.

120. DataCamp's infringement in connection with the Infringing Services perpetrated by the Boss IPTV Cartel remains ongoing despite receipt of YuppTV's DMCA Notice Letters since 2020.

121. Moreover, DataCamp has been involved in other litigation concerning similar allegations – that is, DataCamp willingly allows unauthorized streaming services to use its CDN to commit copyright infringement. Yet, despite these repeated allegations and judgments obtained, DataCamp refuses to implement adequate security measures to remove and disable Pirated Content from being stored and transmitted through the DataCamp CDN.

122. YuppTV informed DataCamp in 2020 of (i) the IP addresses used by the Boss IPTV Platforms and of (ii) how the Boss IPTV Platforms intercept and disseminate the Pirated Content across the DataCamp CDN. DataCamp did nothing to stop the infringement. The Boss IPTV Platforms continue to use the DataCamp CDN to commit copyright infringement as of March 2025 with DataCamp's affirmative knowledge of the infringement.

*Allstream Knowingly Provides Boss IPTV Platforms with the
Means to Continue Pirating YuppTV's Content*

123. Allstream Business, Inc., (and its U.S. affiliate Allstream Business USA, LLC) is a business communications provider based in Ontario, Canada.

124. Allstream offers Internet Protocol (IP) connectivity, managed IP services, dedicated servers, unified communications and voice services to customers located in the U.S. and Canada.

125. Allstream dedicated servers host most of the domain websites for the Boss IPTV Platforms.

126. The primary data center for the Boss IPTV Platforms, located in Calgary, Canada, utilizes Allstream's dedicated servers for channel encoding and video-on-demand (VOD) creation.

127. Allstream's server infrastructure hosts the Customer Relationship Management (CRM) system used by the Boss IPTV Platforms for tracking complaints and payment disputes with Service Users.

128. Allstream's dedicated servers host Eazee Chat, the customer chat platform for all Boss IPTV Platforms.

129. Moreover, the call center handling customer sales and technical support for the Boss IPTV platform, as well as the technical team responsible for streaming and channel encoding, operate remotely from the Faridabad office (India) using Allstream's servers.

130. Boss IPTV Platforms rely on Allstream for CDN backup services, which allows Boss IPTV Platforms to store all data on back-up servers and – when needed -- to transfer all data seamlessly to a new CDN provider without interruptions in service.

131. Allstream Business, Inc., received multiple DMCA notices in 2018–2019, which alerted Allstream that Tashan IPTV (and possibly other Boss IPTV Platforms) was actively using Allstream’s dedicated servers to perpetrate content infringement activities.

132. A separate third-party entity sent these DMCA notices to Allstream (“Third-party DMCA Notices”); YuppTV discovered the Third-Party DMCA notices through its review of the forensic data gathered by DITAC.

133. Allstream failed to undertake corrective measures following receipt of the Third-party DMCA Notices; rather, Allstream has since allowed other Boss IPTV Platforms to utilize Allstream’s dedicated servers in the same manner.

134. Thus, Allstream has facilitated the infringing activities of Boss IPTV Platforms, and continues to do so.

135. Contrary to DMCA requirements, Allstream did not remove or disable access to the Pirated Content identified in the Third-party DMCA Notices received in 2018 and 2019; nor did Allstream require Boss IPTV Platforms to submit DMCA-compliant counter notices, which would have identified all operators of Boss IPTV Platforms to YuppTV.

136. Boss IPTV Platforms continue to use Allstream’s dedicated servers for committing infringement of the Protected Channels and the Works performed on those Protected Channels.

137. Upon receiving the Third-party DMCA Notices in 2018 and 2019, Allstream either (i) failed to respond entirely; (ii) responded by indicating it had forwarded the DMCA Notices to the responsible customer to remove the infringing content; or (iii) asked for additional information.

138. Upon information and belief, Allstream has sufficient documentation of the systemic infringement perpetrated by the Boss IPTV Platforms and the Boss IPTV Cartel.

139. Allstream failed to remove or block the Protected Channels or the Works from being transmitted through its servers and failed to terminate the Boss IPTV Platforms responsible for the infringement, despite receiving the Third-party DMCA Notices and other evidence of infringement by Boss IPTV Platforms.

140. Allstream has benefited financially by allowing Boss IPTV Platforms and the Boss IPTV Cartel to operate across the Allstream dedicated servers, despite Allstream's knowledge of the Boss IPTV Cartel's continued copyright infringement of the copyrighted content available on YuppTV's Platform and Allstream's criticality to the distribution of that infringing content.

141. Allstream, consequently, is ineligible for safe harbor under the DMCA. Allstream failed to terminate the Boss IPTV Platforms as repeat infringers using the Allstream dedicated servers and failed to designate an agent with the United States Copyright Office.

142. Allstream's infringement in connection with the Infringing Services perpetrated by the Boss IPTV Cartel remains ongoing despite receipt of the Third-party DMCA Notices, which clearly and succinctly identified the infringing activities of the Boss IPTV Cartel and the Boss IPTV Platforms.

COUNT I

Direct Copyright Infringement Against Direct Infringers 17 U.S.C. §§ 106(1), (4)

143. YuppTV incorporates all preceding paragraphs as if set forth at length here.

144. YuppTV is a copyright owner under 17 U.S.C. § 106 because YuppTV holds, or held during the relevant time period, the non-exclusive rights to transmit, distribute, and publicly perform in the United States, by means including OTT, and the internet, the programs that make up the Protected Channels.

145. The programs that make up the Protected Channels are original audiovisual works fixed in a tangible medium of expression and are therefore copyrightable subject matter. YuppTV's rights to publicly perform the programs that aired on the Protected Channels arise under the laws of India, a nation that is a party to copyright treaties with the United States and where the programs were authored and first published. Under 17 U.S.C. §§ 101 and 411, the programs that make up the Protected Channels are non-United States works and, therefore, registration with the United States Copyright Office is not a prerequisite to filing a copyright infringement action with respect to these works.

146. Without permission from YuppTV, the Direct Infringers infringe YuppTV's licensed rights in the copyrighted programs that make up the Protected Channels by transmitting those copyrighted programs through the Boss IPTV Platforms (using servers controlled by the Direct Infringers) to Service Users in the United States and Canada.

147. By transmitting the copyrighted programs through the Boss IPTV Platforms to Service Users in the United States and Canada, the Direct Infringers publicly perform the Protected Channels and the copyrighted programs that make up the Protected Channels without authorization from YuppTV, thereby illegally infringing YuppTV's rights under 17 U.S.C. § 106.

148. The Direct Infringers have and had actual knowledge that their actions illegally infringe YuppTV's rights to transmit and publicly perform the Protected Channels and the copyrighted programs that make up the Protected Channels.

149. The illegal infringement of YuppTV's rights in each copyrighted program publicly performed by the Protected Channels constitutes a separate and distinct act of copyright infringement.

150. The Direct Infringers are jointly and severally liable for each act of illegal infringement described above because they personally directed, authorized, supervised, or participated in, and financially benefited from such infringing conduct as alleged herein.

151. The Direct Infringers' actions are willful, malicious, intentional, and purposeful, and in disregard of and with indifference to the rights of YuppTV and have been conducted on a sustained basis over a number of years, despite receiving notices to discontinue their illegal acts.

152. Unless enjoined by the Court, the Direct Infringers will continue to engage in acts causing substantial and irreparable injury to YuppTV that includes damage to its reputation, loss of goodwill, lost sales, and lost profits for which there is no adequate remedy at law.

COUNT II

Violation of the Digital Millennium Protection Act (DMCA), 17 U.S.C. § 1201, *et seq.*

153. YuppTV incorporates all preceding paragraphs as if set forth at length here.

154. Section 1201(a)(1)(A) of the DMCA provides in pertinent part that “[n]o person shall circumvent a technological measure that effectively controls access to a work protected under [the Copyright Act].” 17 U.S.C. § 1201(a)(1)(A).

155. YuppTV uses technological protection measures (“TPMs”) to effectively control access to, and to protect the rights of copyright in, motion pictures, television programs and other works protect by the Copyright Act.

156. On information and belief, the Direct Infringers circumvent the TPMs that YuppTV employs (including passwords, paywalls, subscriptions, registration keys, limits upon the number of simultaneous users, encryption/scrambling, download blocking, etc.). The Direct Infringers, therefore, have violated 17 U.S.C. § 1201(a)(1)(A).

157. This illegal circumvention by the Direct Infringers in violation of the DMCA constitutes a separate and independent unlawful act and claim for relief from those stated in the first cause of action.

158. YuppTV has sustained and will sustain actual damage as the result of Direct Infringers' DMCA violations, including, *inter alia*, damages to the value of the Copyrighted Works and the reduction in YuppTV's goodwill and economic interests in the Copyrighted Works. 17 U.S.C. § 1203(c)(2). YuppTV is also entitled to the Direct Infringers' profits from their violations of the DMCA. *Id.*

159. Alternatively, and at their election, YuppTV is entitled to an award of the maximum statutory damages as permitted by the DMCA. *Id.* 17 U.S.C. § 1203(c)(3).

160. The Direct Infringers conduct, unless enjoined and restrained by this Court, will cause immediate and irreparable injury to YuppTV which has no other adequate remedy at law. Pursuant to 17 U.S.C. § 1203(b)(2), YuppTV is entitled to preliminary and permanent injunctions prohibiting the Direct Infringers from committing further violations of § 1201.

161. YuppTV is further entitled to its attorneys' fees and full costs pursuant to 17 U.S.C. § 1203.

COUNT III

Contributory Copyright Infringement, 17 U.S.C. § 501
Against DataCamp, Allstream, Allstream USA, Infomir.eu and Infomir, LLC

162. YuppTV incorporates all preceding paragraphs as if set forth at length here.

163. YuppTV is a copyright owner under 17 U.S.C. § 106 because YuppTV holds or held licensed rights to publicly perform the content broadcasted over the Protected Channels (including the "Works") in the United States by means including OTT and internet.

164. The Works are original audiovisual works fixed in a tangible medium of expression, and are therefore copyrightable subject matter. YuppTV's copyrights in the Works arise under laws of nations other than the United States that are parties to copyright treaties with the United States, including India where the programs were authored and first published. Under 17 U.S.C. §§ 101 and 411, the Works are non-United States works and therefore registration with the United States Copyright Office is not a prerequisite to filing a US copyright infringement action for the Works.

165. YuppTV's licensed rights to publicly perform the Works, including those streamed over the Protected Channels identified in **Exhibits A**, are directly infringed by

unauthorized transmission of these works from the Boss IPTV Platforms and the Boss IPTV Cartel to Service Users who access the Pirated Content.

166. The Boss IPTV Platforms and the Boss IPTV Cartel use the DataCamp CDN to publicly perform the Pirated Content, including the Works.

167. Likewise, Allstream dedicated servers host most of the Boss IPTV Platforms and, thus, facilitate and enable those Platforms and the Boss IPTV Cartel to engage in the copyright infringement relating to the Protected Channels and the Works publicly performed on those Channels.

168. DataCamp, Allstream, Allstream USA, Infomir.eu and Infomir, LLC (collectively, “Enabling Defendants”) materially contributed to the direct infringement of YuppTV’s public performance rights by the Boss IPTV Platforms and the Boss IPTV Cartel.

169. Through (i) YuppTV’s DMCA Notice Letters, (ii) DMCA Notices from other victims and (iii) the governmental investigation by Indian authorities (including the data collected by DITAC), Enabling Defendants had actual knowledge that the transmission of the Pirated Content (including the Works) to Service Users infringes YuppTV’s public performance rights and that the infrastructure of Enabling Defendants was being used for such copyright infringement on a massive scale. This includes DataCamp’s CDN, Allstream’s dedicated servers that host the Boss IPTV Platforms, and Infomir’s “MAG set-top boxes” with preinstalled “Ministra Pro” middleware.

170. Enabling Defendants also had actual knowledge that its subscribers, the Boss IPTV Platforms and the Boss IPTV Cartel, engaged in repeated and willful copyright infringement. Enabling Defendants facilitated, encouraged, and materially contributed to the infringement by the Boss IPTV Platforms and the Boss IPTV Cartel because they continued to provide their services, servers, hardware devices, and the facilities necessary for the Boss IPTV Platforms to commit repeated infringement.

171. DataCamp, Allstream and Allstream USA had the means to withhold their assistance to the Boss IPTV Platforms and the Boss IPTV Cartel upon learning of the URLs, domain names, and IP addresses associated with the servers providing access to the Pirated Content (including the Works), including by removing or disabling access to the Pirated Content (including the Works) or terminating the accounts of the Boss IPTV Platforms and the Boss IPTV Cartel. But DataCamp, Allstream and Allstream USA failed to do so.

172. Likewise, Infomir and Infomir LLC had the capability of cancelling its contractual relationship with the Boss IPTV Platforms and the Boss IPTV Cartel, and thus refusing to manufacture the “MAG set-top boxes” with the preinstalled “Ministra Pro” middleware.

173. Infomir and Infomir LLC chose – like DataCamp, Allstream and Allstream LLC – to continue its relationship with the Boss IPTV Platforms and the Boss IPTV

Cartel, with the knowledge that doing so facilitated and enabled further copyright infringement.

174. Enabling Defendants could have taken these simple measures to prevent further illegal infringement of YuppTV's licensed rights to publicly perform the Works. But Enabling Defendants took no such measures.

175. By purposely ignoring or turning a blind eye to the willful and repeated infringement by the Boss IPTV Platforms and the Boss IPTV Cartel, Enabling Defendants knowingly caused and materially contributed to the unauthorized public performance of the Pirated Content (including the Works), in violation of YuppTV's licensed rights.

176. Enabling Defendants' actions are willful, malicious, intentional, purposeful, and in disregard of and with indifference to the rights of YuppTV.

177. Unless enjoined by the Court, Enabling Defendants will continue to engage in acts causing substantial and irreparable injury to YuppTV that includes damage to its reputation, loss of goodwill, and lost sales, for which there is no adequate remedy at law.

COUNT IV

Vicarious Copyright Infringement, 17 U.S.C. § 501 Against DataCamp, Allstream, Allstream USA, Infomir.eu and Infomir, LLC

178. YuppTV incorporates all preceding paragraphs as if set forth at length here.

179. DataCamp, Allstream, Allstream USA, Infomir.eu and Infomir, LLC (collectively, “Enabling Defendants”) are liable as vicarious copyright infringers for the direct infringement by the Boss IPTV Platforms and the Boss IPTV Cartel of YuppTV’s public performance rights.

180. Enabling Defendants has the legal right and the actual ability to supervise and control the infringing activities of the Boss IPTV Platforms and the Boss IPTV Cartel through the DataCamp CDN, the Allstream dedicated servers, and the Infomir “MAG set-top boxes,” respectively. Enabling Defendants failed to stop the infringement of YuppTV’s licensed rights in the Pirated Content (including the Works and the Protected Channels).

181. The Boss IPTV Platforms and the Boss IPTV Cartel are motivated to become DataCamp and Allstream subscribers due to their knowledge that they can publicly perform the Pirated Content (including the Works) without interference from DataCamp or Allstream. In particular, DataCamp continually failed to comply fully with YuppTV’s DMCA Notice Letters.

182. Similarly, Infomir and Infomir LLC continue as the producer of “MAG set-top boxes” for the Boss IPTV Platforms and the Boss IPTV Cartel, given the Cartel’s knowledge that the Boss IPTV Platforms can publicly perform the Pirated Content (including the Works) without interference from Infomir or Infomir LLC.

183. At all relevant times, Enabling Defendants had a financial interest in, and derived direct financial benefit from, the Boss IPTV Platforms and the Boss IPTV Cartel's infringing use of the DataCamp CDN, the Allstream dedicated servers, and the Infomir "MAG set-top boxes," respectively. The DataCamp CDN, the Allstream dedicated servers, and the Infomir "MAG set-top boxes" are used to publicly perform the Pirated Content, which includes thousands of Works to an unknown number of Service Users. This usage serves as a draw for Enabling Defendants to attract, retain, and charge more fees to its customers. By failing (i) to terminate accounts of the Boss IPTV Platforms and the Boss IPTV Cartel; (ii) to remove or disable access to the Pirated Content (including the Works); and (iii) to cease producing "MAG set-top boxes" for exclusive use on Boss IPTV Platforms, Enabling Defendants illegally profited from illicit revenue that they would not otherwise have received.

184. Enabling Defendants' actions are willful, malicious, intentional, purposeful, and in disregard of and with indifference to the rights of YuppTV.

REQUEST FOR RELIEF

Plaintiffs respectfully requests that this Court grant judgment in favor of Plaintiff and against Defendants as follows:

(1) Permanently enjoining Defendants and their officers, agents, servants, and employees, and all those acting in active concert or participation with them, from (i)

distributing, publicly performing, and/or in any way transmitting video content in which YuppTV holds licensed rights, including certain of the Protected Channels and the programs and/or Works that make up those Protected Channels; (ii) inducing, encouraging, causing, facilitating, and/or materially contributing to the unauthorized distribution, public performance, and/or transmission by others of the programs and/or Works that make up the Protected Channels in which YuppTV holds licensed rights; (iii) distributing, selling, advertising, marketing, or promoting the Infringing Services by the Boss IPTV Platforms and the Boss IPTV Cartel, or any other service that contains, connects to, offers for download, transmits, assists in the transmission of, streams, hosts, provides access to, or otherwise distributes or publicly performs, or displays directly or indirectly, by means of any device or process, any of the Protected Channels or any one or more of the programs and/or Works that make up the Protected Channels in which YuppTV holds licensed rights; or (iv) enabling, assisting, or consulting with other persons or entities to do any of the activities described in (i)-(iii) above, including by selling, leasing, licensing, assigning, conveying, distributing, loaning, encumbering, pledging, or otherwise transferring, whether or not for consideration or compensation, any part of their infringing operations;

(2) Permanently enjoining Defendants from distributing, providing, promoting, and/or selling set-top boxes and services that distribute or publicly perform the Protected Channels or the copyrighted programs (and/or Works) that make up the

Protected Channels in the United States or otherwise provide to users in the United States access to the Protected Channels or the copyrighted programs (and/or Works) that make up the Protected Channels;

(3) For all Registered Works, statutory damages as awarded by the Court as specified under 17 U.S.C. § 504(c), or the Defendants' profits attributable to the infringement of those registered works under 17 U.S.C. § 504(b);

(4) For unregistered works, an award of Defendants' profits attributable to the infringement of each unregistered work under 17 U.S.C. § 504(b);

(5) Awarding YuppTV its costs of prosecuting this action, including reasonable attorneys' fees, pursuant to 17 U.S.C. § 505;

(6) Awarding YuppTV prejudgment interest and post judgment interest at the highest legal rate allowed under law;

(7) Directing Defendants to file with this Court within thirty (30) days after the entry of final judgment a written statement, under oath, setting forth in detail the manner in which they have complied with the Judgment of the Court; and

(8) Awarding YuppTV such other and further relief as this Court deems just, proper, and equitable.

Respectfully Submitted,

GOLDSTEIN LAW PARTNERS, LLC

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Date: May 22, 2025

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

YuppTV USA, Inc.

(b) County of Residence of First Listed Plaintiff Alpharetta, GA

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Jonathan S. Goldstein; Shawn M. Rodgers; 200 School Alley, Suite 5; Green Lane, PA
18054; 610.949.0444; jgoldstein@goldsteinlp.com; srodgers@goldsteinlp.com

DEFENDANTS

Harpreet Singh Randhawa, Vois Inc., 2144644 Alberta Ltd.,
Server Center Ltd., Rhysley Pvt. Ltd., et al.County of Residence of First Listed Defendant Calgary, Canada

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|-----------------------------------------|----------------------------|----------------------------|---------------------------------------------------------------|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
Infringement of Plaintiff's rights under the Copyright Act (17 U.S.C. § 101 et seq.) and Violation of the Digital Millennium Copyright Act (§ 1201 et seq.) ("DMCA")

Brief description of cause: Violation of DMCA; direct, vicarious and contributory Copyright Infringement

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

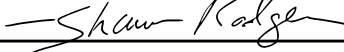
VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____ DOCKET NUMBER _____

DATE
May 22, 2025

SIGNATURE OF ATTORNEY OF RECORD



FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

EXHIBIT A

Star Network

Channel	Language	Type	Category
Star Plus US HD	Hindi	PAID	Entertainment
Star Bharat US HD	Hindi	PAID	Entertainment
Star Vijay US HD	Tamil	PAID	Entertainment
Star Pravah US HD	Marathi	PAID	Entertainment
Star Jalsha US HD	Bengali	PAID	Entertainment
Star Suvarna US HD	Kannada	PAID	Entertainment
Star Maa Music US	Telugu	PAID	Entertainment
Star Maa US HD	Telugu	PAID	Entertainment
Star Maa Movies US HD	Telugu	PAID	Entertainment
Star MAA Gold US	Telugu	PAID	Entertainment
Asianet Plus US	Malayalam	PAID	Entertainment
Asianet US	Malayalam	PAID	Entertainment
Asianet Movies US	Malayalam	PAID	Entertainment

Colors

Channel	Language	Type	Category
Colors Rishtey US	Hindi	PAID	Entertainment
Colors TV	Hindi	PAID	Entertainment
Colors Tamil US	Tamil	PAID	Entertainment
Colors Kannada US	Kannada	PAID	Entertainment
Colors Marathi US	Marathi	PAID	Entertainment
Colors Bangla US	Bengali	PAID	Entertainment
Colors Gujarati US	Gujarati	PAID	Entertainment
Colors Cineplex	Hindi	PAID	Movies
MTV India International	Hindi	PAID	Entertainment
News18 Kerala	Malayalam	PAID	News
News18	English	PAID	News

ETV

Channel	Language	Type	Category
ETV Telugu HD US	Telugu	PAID	Entertainment
ETV Telugu HD	Telugu	PAID	Entertainment
ETV Life	Telugu	PAID	Entertainment
ETV Cinema	Telugu	PAID	Entertainment
ETV Abhiruchi	Telugu	PAID	Entertainment
ETV Plus	Telugu	PAID	Entertainment
ETV Plus US	Telugu	PAID	Entertainment
ETV Life US	Telugu	PAID	Entertainment
ETV Abhiruchi US	Telugu	PAID	Entertainment
ETV Cinema US	Telugu	PAID	Movies
ETV Telangana	Telugu	FREE	News

ETV Andhra Pradesh	Telugu	FREE	News
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Mazhavil

Channel	Language	Type	Category
Mazhavil Manorama	Malayalam	PAID	Entertainment
Mazhavil Manorama HD	Malayalam	PAID	Entertainment
Manorama News	Malayalam	FREE	News

IBC

Channel	Language	Type	Category
IBC Tamil	Tamil	PAID	Entertainment
IBC Bakthi	Tamil	PAID	Entertainment
IBC Radio	Tamil	FREE	Entertainment

Flowers

Channel	Language	Type	Category
Flowers USA	Malayalam	PAID	Entertainment
24	Malayalam	FREE	News

Zee News

Channel	Language	Type	Category
Zee News	Hindi	FREE	News
Zee Business	Hindi	FREE	News
Zee Punjab Haryana Himachal	Punjabi	FREE	News
Zee Hindustan	Hindi	FREE	News
Zee Rajasthan News	Hindi	FREE	News
Zee Salaam	Urdu	FREE	News
Zee Madhya Pradesh Chhattisgarh	Hindi	FREE	News
Zee UP UK	Hindi	FREE	News
Zee Bihar Jharkhand	Hindi	FREE	News
Zee Delhi NCR Haryana	Hindi	FREE	News
Zee 24 Kalak	Gujarati	FREE	News
Zee News Telugu	Telugu	FREE	News
24 Taas	Marathi	FREE	News
24 Ghanta	Bengali	FREE	News
Wion	English	FREE	News

YuppTV

Channel	Language	Type	Category
BBO	Hindi	PAID	Movies
BBO Classic	Hindi	PAID	Movies
YUPPTV VEDA	Telugu	FREE	Spiritual
T-SAT Nipuna	Telugu	FREE	Educational
T-SAT Vidya	Telugu	FREE	Educational

Turito IIT JEE	English	FREE	Educational
Turito NEET	English	FREE	Educational

SoFast

Channel	Language	Type	Category
KIDDO	English	FREE	Kids
4K TRAVEL TV	English	FREE	LifeStyle
HERITAGE	English	FREE	LifeStyle
HD TRAVEL TV	English	FREE	LifeStyle
ARAB HERITAGE TV	English	FREE	LifeStyle
DEFIANCE MEDIA	English	FREE	LifeStyle
DROOL	English	FREE	LifeStyle
ESCAPE TV	English	FREE	LifeStyle
LUXURY DREAMS TV	English	FREE	LifeStyle
UNCHAINEDTV	English	FREE	LifeStyle
COLOUR BLIND	English	FREE	Others
THE EXPLORERS	English	FREE	Others
MAMA BENZ TV	English	FREE	Others
DOCUVISION	English	FREE	Others
BANG BANG TV	English	FREE	Others
COWBOY MOVIE CHANNEL	English	FREE	Others
HERITAGE TOURISM TV	English	FREE	Others
MERCURY	English	FREE	Others
SPORT FISHING TV	English	FREE	Others
HORROR TV	English	FREE	Others
KUNG FU	English	FREE	Others
SPACE SERIES	English	FREE	Others
XTREM SPORTS	English	FREE	Sports
AMERICAS BOATING CHANNEL	English	FREE	Sports
CHRONO TV	English	FREE	Sports
FIGHT TV	English	FREE	Sports
THE CHUKKER CHANNEL	English	FREE	Sports
KOZOOM	English	FREE	Sports
ACE TV	English	FREE	Sports
MMA TV	English	FREE	Sports
MOTOR RACING	English	FREE	Sports
BEST ACTION TV	English	FREE	Movies
BEST CLASSIC TV	English	FREE	Movies
DRIVE IN MOVIE CHANNEL	English	FREE	Movies
THALAA TV	Tamil	FREE	Movies
TOLLY TV	Telugu	FREE	Movies
EDGY URBAN	English	FREE	Music
JUPITER TV	English	FREE	Music
WILDEST WISH TV	English	FREE	Music
DANGER VISION TV	English	FREE	News

OAN PLUS	English	FREE	News
VOA News	English	FREE	News
AWE PLUS	English	FREE	Entertainment
BRAT TV	English	FREE	Entertainment
COMEDY TADKA	Hindi	FREE	Entertainment
DIY ART	Hindi	FREE	Entertainment
JUST FOR LAUGHS GAGS	English	FREE	Entertainment
WESHORT	English	FREE	Entertainment
NITRO TV	English	FREE	Entertainment
EDGY TV	English	FREE	Entertainment
ENCORE	English	FREE	Entertainment
CARTOON TV CLASSICS	English	FREE	Entertainment
SCIFI WORLD	English	FREE	Entertainment
URBAN ACTION	English	FREE	Entertainment
BOLLYWOOD 4U	Hindi	FREE	Entertainment
HEARTFELT TV	English	FREE	Entertainment
LOL TV	English	FREE	Entertainment
LOVE 2 HATE TV	English	FREE	Entertainment
LATINO CLASSIC CHANNEL	English	FREE	Entertainment
ENGLISH TV	English	FREE	Entertainment
COEUR OCEAN TV	English	FREE	Entertainment
TRUFA	English	FREE	Entertainment
VOYAGES	English	FREE	Entertainment
MUNDO SERIES	English	FREE	Entertainment
OUTER VISION TV	English	FREE	Entertainment
CUISINE & CULTURE	English	FREE	LifeStyle

TV9

Channel	Language	Type	Category
TV9 News	Telugu	FREE	News
TV9 Kannada	Kannada	FREE	News
TV9 Marathi	Marathi	FREE	News
TV9 Gujarati	Gujarati	FREE	News
TV9 Bharatvarsh	Hindi	FREE	News
TV9 Bangla	Bengali	FREE	News

ABP

Channel	Language	Type	Category
ABP News	Hindi	FREE	News
ABP Ananda	Bengali	FREE	News
ABP Majha	Marathi	FREE	News
ABP Asmita	Gujarati	FREE	News

Republic

Channel	Language	Type	Category
Republic TV	English	FREE	News
Republic Bharat	Hindi	FREE	News
Republic Bangla	Bengali	FREE	News
Republic Kannada	Kannada	FREE	News

Aaj Tak

Channel	Language	Type	Category
Aajtak	Hindi	FREE	News
India Today News	English	FREE	News
Good News Today	Hindi	FREE	News

Other Agreement Channels

Channel	Language	Type	Category
Pitaara TV	Punjabi	FREE	Movies
Pitaara Comedy	Punjabi	FREE	Entertainment
Divya TV	Hindi	FREE	Spiritual
Divya Bhajan	Hindi	FREE	Spiritual
Desi Play TV	Hindi	FREE	Entertainment
Willow Sports	English	FREE	Sports
Mirror Now	English	FREE	News
Times Now Navbharat	Hindi	FREE	News
DD INDIA	English	FREE	News
Athavan TV HD	Tamil	FREE	News
Asianet News	Malayalam	FREE	News
Green Gold TV	Hindi	FREE	Kids
Boogle Bollywood	Punjabi	FREE	Entertainment

NDTV

Channel	Language	Type	Category
NDTV GoodTimes	English	FREE	LifeStyle
NDTV 24x7	English	FREE	News
NDTV INDIA	Hindi	FREE	News
NDTV Profit	English	FREE	News
NDTV MP	Hindi	FREE	News
NDTV Rajasthan	Hindi	FREE	News

SAB Group

Channel	Language	Type	Category
Mastiii	Hindi	FREE	Music
Maiboli	Marathi	FREE	Music
Dabangg	Bhojpuri	FREE	Movies

EXHIBIT E



Reg. Notice of Copyright Infringement on behalf of IndiaCast Media Distribution Private Limited from YUPPTV.

From Anti Piracy <antipiracy@yupptv.com>

Date Wed 17-02-2021 00:09

To security@datapacket.com <security@datapacket.com>

Cc Sudheer Kumar Bompelly <sudheerb@yupptv.com>; Uday Reddy <uday@yupptv.com>

This letter is to notify you, pursuant to the Digital Millennium Copyright Act ("DMCA") of 1998 by making available (sharing) copyrighted material over the internet and The General Data Protection Regulation (GDPR) Law, that Boss IPTV Box is showing copyrighted materials. So, Boss IPTV Box is infringing copyrighted materials whose CDN is hosted on dedicated IP addresses 89.187.181.104, 185.246.209.73, 185.246.209.251 and 89.187.181.6 which belongs to Datacamp Limited. So, Boss IPTV Box is misusing Datacamp Limited platform and infringing copyrighted materials.

Specifically, Yupptv.com a product of YuppTV USA Inc, owns non-exclusive rights to take anti piracy actions on behalf of IndiaCast Media Distribution Private Limited ("IndiaCast") network channels for commercial and promotional purposes and all its intellectual property of the all Live/VOD/ On Demand contents/ All channels and its member teams, including, but not limited to, all moving images and other audio/video content featuring. Please find enclosed PDF file for IndiaCast Media Distribution Private Limited ("IndiaCast") Network authorization letter. Boss IPTV Box is being displayed and/or disseminated IndiaCast Media Distribution Private Limited ("IndiaCast") network Channels without the permission or authorization of YuppTV USA Inc or IndiaCast Media Distribution Private Limited ("IndiaCast"). We checked this all given links in Australia IP address.

Please find below :

IndiaCast Media Distribution Private Limited ("IndiaCast") Authorization PDF file download link :

[http://dmca.yupptv.com/DMCA/IndiaCast_2021_01_08%20_Yupp_TV_authority_letter\(revised\).pdf](http://dmca.yupptv.com/DMCA/IndiaCast_2021_01_08%20_Yupp_TV_authority_letter(revised).pdf)

Boss IPTV Box IndiaCast Media Distribution Private Limited ("IndiaCast") network channels piracy PDF file download link :

[http://dmca.yupptv.com/DMCA/16022021/BOSS_IPTV_BOX_INDIACAST\(COLORS\)_NETWORK_CHANNELS_PPT_AUS_IP_15THFEB2021.pdf](http://dmca.yupptv.com/DMCA/16022021/BOSS_IPTV_BOX_INDIACAST(COLORS)_NETWORK_CHANNELS_PPT_AUS_IP_15THFEB2021.pdf)

Note:

Please find the below Urls to be removed:

101 COLORS HD

<http://dpchi3.1234.uno:6061/colors/index.m3u8?> (IP : 89.187.181.104)

102 COLORS INDIA HD

<http://dpchi2.1234.uno:6061/colorsindia/index.m3u8?> (IP : 185.246.209.73)

157 MTV INDIA

<http://mnb.1234.uno:6061/mtvindia/index.m3u8?> (IP : 185.246.209.251)

158 MTV PLUS

<http://dpchi1.1234.uno:6061/mtvplushd/index.m3u8?> (IP : 89.187.181.6)

159 MTV BEATS

<http://dpchi1.1234.uno:6061/mtvbeats/index.m3u8?> (IP : 89.187.181.6)

268 COLORS CINEPLEX HD

<http://dpchi1.1234.uno:6061/rishtecineplex/index.m3u8?> (IP : 89.187.181.6)

366 COLORS INFINITY

<http://dpchi3.1234.uno:6061/colorinfinityhd/index.m3u8?> (IP : 89.187.181.104)

504 COLORS BANGLA

<http://mnb.1234.uno:6061/colorsbanglaindia/index.m3u8?> (IP : 185.246.209.251)

602 COLORS GUJRATI

<http://mnb.1234.uno:6061/colorsgujarati/index.m3u8?> (IP : 185.246.209.251)

617 COLORS GUJRATI CINEMA

<http://dpchi1.1234.uno:6061/colorsgujaraticinema/index.m3u8?> (IP : 89.187.181.6)

653 COLORS MARATHI

<http://mnb.1234.uno:6061/colorsmarathi/index.m3u8?> (IP : 185.246.209.251)

654 COLORS MARATHI HD IN

<http://mnb.1234.uno:6061/colorsmarathiindia/index.m3u8?> (IP : 185.246.209.251)

808 COLORS TAMIL

<http://mnb.1234.uno:6061/colorstamil/index.m3u8?> (IP : 185.246.209.251)

809 COLORS TAMIL HD

<http://mnb.1234.uno:6061/colorstamilus/index.m3u8?> (IP : 185.246.209.251)

952 COLORS KANNADA HD IN

<http://mnb.1234.uno:6061/colorkannadaindia/track-v1a1/mono.m3u8?> (IP : 185.246.209.251)

Accordingly, YuppTV USA Inc requests that you act immediately and force Boss IPTV Box to remove or disable IndiaCast Media Distribution Private Limited ("IndiaCast") Network Channels from Boss IPTV Box with Server IP: 89.187.181.104,185.246.209.73,185.246.209.251 and 89.187.181.6 or suspend their CDN with server IP : 89.187.181.104,185.246.209.73,185.246.209.251 and 89.187.181.6 to the unauthorized videos being displayed and/or disseminated through Boss IPTV Box.

I hereby state that YuppTV USA Inc owns the rights referenced above and I hereby state that I have a good faith belief that use of the content in the manner complained of is not authorized by the Channels owner, its agents, or the law.

I Mamidipudi Venkata prabhakar, as a representative of YuppTV USA Inc. hereby digitally sign this e-mail message under penalty of perjury under the laws of the United States of America with the additional statement under penalty of perjury that the information in the notice is accurate.

If you have any questions, please contact the undersigned at the contact information provided below.

Mamidipudi Venkata prabhakar
YuppTV USA Inc
11175 Cicero Drive,
Suite 100 Alpharetta,GA 30022
+16784583705



Reg.Notice of Copyright Infringement on behalf of MSM Asia Limited (Sony Network) from YUPPTV..

From Anti Piracy <antipiracy@yupptv.com>

Date Tue 16-02-2021 23:58

To security@datapacket.com <security@datapacket.com>

Cc Sudheer Kumar Bompelly <sudheerb@yupptv.com>; Uday Reddy <uday@yupptv.com>

This letter is to notify you, pursuant to the Digital Millennium Copyright Act ("DMCA") of 1998 by making available (sharing) copyrighted material over the internet and The General Data Protection Regulation (GDPR) Law, that Boss IPTV Box is showing copyrighted materials. So, Boss IPTV Box is infringing copyrighted materials whose CDN is hosted on dedicated IP addresses 185.246.209.251, 185.246.209.73 and 89.187.181.6 which belongs to Datacamp Limited. So Boss IPTV Box is misusing Datacamp Limited platform and infringing copyrighted materials.

Specifically, Yupptv.com a product of YuppTV USA Inc, owns the rights to take anti piracy actions on behalf of MSM and its affiliates linear channels and the content exclusive to such channels (content) for commercial and promotional purposes and all it's intellectual property of the all Live/VOD/ On Demand contents/ All channels and its member teams, including, but not limited to, all moving images and other audio/video content featuring. YOYO IPTV box is being displayed and/or disseminated MSM Channels without the permission or authorization of YuppTV USA Inc or MSM Asia Limited, For more details go through authorization letter.

Please Find the Piracy URL'S to be removed:

109 SONY INDIA HD
http://mnbl.1234.uno:6061/sonyindia/index.m3u8? (IP : 185.246.209.251)

118 SAB INDIA HD
http://dpchi2.1234.uno:6061/sabindia/index.m3u8? (IP : 185.246.209.73)

119 SONY PAL
http://mnbl.1234.uno:6061/sonypal/index.m3u8? (IP : 185.246.209.251)

264 SONY MAX HD
http://dpchi1.1234.uno:6061/setmaxxindia/index.m3u8? (IP : 89.187.181.6)

Please find below :

Letter of Sony network Authorization letter PDF file download link :

http://dmca.yupptv.com/DMCA/Sony_Networks_Authorization%20letter_Yupp%20TV.PDF

Boss IPTV Box MSM Asia Limited / Sony network channels piracy PDF file download link :

Accordingly, YuppTV USA Inc requests that you act immediately and force Boss IPTV Box to remove or disable MSM Asia Limited, ("Sony") Network Channels from Boss IPTV Box with Server IP: 185.246.209.251, 185.246.209.73 and 89.187.181.6 or suspend their CDN with server IP : 185.246.209.251, 185.246.209.73 and 89.187.181.6 to the unauthorized videos being displayed and/or disseminated through Boss IPTV Box.

I hereby state that YuppTV USA Inc owns the rights referenced above and I hereby state that I have a good faith belief that use of the content in the manner complained of is not authorized by the Channels owner, its agents, or the law.

I Mamidipudi Venkata prabhakar, as a representative of YuppTV USA Inc. hereby digitally sign this e-mail message under penalty of perjury under the laws of the United States of America with the additional statement under penalty of perjury that the information in the notice is accurate.

If you have any questions, please contact the undersigned at the contact information provided below.

Mamidipudi Venkata prabhakar
YuppTV USA Inc
11175 Cicero Drive,
Suite 100 Alpharetta,GA 30022
+16784583705



Reg.Notice of Copyright Infringement on behalf of MSM Asia Limited(Sony Network)from YUPPTV.

From Anti Piracy <antipiracy@yupptv.com>

Date Thu 04-06-2020 01:00

To security@datapacket.com <security@datapacket.com>

Cc zdenek@superhosting.cz <zdenek@superhosting.cz>; simon.rybisar@cdn77.com <simon.rybisar@cdn77.com>; Sudheer Kumar Bompelly <sudheerb@yupptv.com>; Uday Reddy <uday@yupptv.com>; jiri@superhosting.cz <jiri@superhosting.cz>

This letter is to notify you, pursuant to the Digital Millennium Copyright Act ("DMCA") of 1998 by making available (sharing) copyrighted material over the internet and The General Data Protection Regulation (GDPR) Law, Boss IPTV is showing copyrighted materials. So, Boss IPTV is infringing copyrighted materials whose CDN is hosted on dedicated IP address 185.59.220.187, 185.102.219.69, 185.59.220.103, 185.246.210.115, 185.59.220.178, 85.102.218.53, 195.181.173.91, and 195.181.170.48 which belongs to Datacamp Limited. So, Boss IPTV is misusing Datacamp Limited dedicated server platforms and infringing copyrighted materials.

Specifically, Yupptv.com a product of Yupptv USA Inc, owns the rights to take anti piracy actions on behalf of MSM and its affiliates linear channels and the content exclusive to such channels (content) for commercial and promotional purposes and all its intellectual property of the all Live/VOD/ On Demand contents/ All channels and its member teams, including, but not limited to, all moving images and other audio/video content featuring. Boss IPTV is being displayed and/or disseminated MSM Channels without the permission or authorization of Yupptv USA Inc or MSM Asia Limited(Sony Network), We checked this all given links in Australian IP address. For more details go through authorization letter.

Please find the below Urls and its IP address to be removed:

Server IP's: 185.59.220.187, 185.102.219.69, 185.59.220.103, 185.246.210.115, 185.59.220.178, 85.102.218.53, 195.181.173.91, and 195.181.170.48

Channel URL's :

2492 Sony Ten 1 HD

Url : <http://185.59.220.187:25461/XXXXXXXXXXXX/XXXXXXXXXXXX/54248>

2493 IN: Spo Ten2 FHDxxx

Url : <http://103.194.169.40:25461/XXXXXXXXXXXX/XXXXXXXXXXXX/54249?>

2494 IN: Spo Ten3 FHD

Url : <http://185.59.220.187:25461/XXXXXXXXXXXX/XXXXXXXXXXXX/54247?>

2511 IN: Hin SonyTV FHD

Url : <http://185.59.220.187:25461/XXXXXXXXXXXX/XXXXXXXXXXXX/54238?>

2518 IN: Hin Sony Sab FHD

Url : <http://185.59.220.187:25461/XXXXXXXXXXXX/XXXXXXXXXXXX/54229?>

2548 IN: Hindi Max FHD

Url : <http://185.102.219.69:25461/XXXXXXXXXXXX/XXXXXXXXXXXX/54153?>

2656 IN: Sony TV HD

Url : <http://185.59.220.103:25461/XXXXXXXXXX/XXXXXXXXXXXX/54044?>

6250 IN: Sony Max2

Url : <http://185.246.210.115:25461/XXXXXXXXXXXX/XXXXXXXXXXXX/882?>

6260 IN: VIP Sony Max HD

Url : <http://185.59.220.178:25461/XXXXXXXXXX/XXXXXXXXXXXX/5636?>

6341 IN: Sony HD

Url : <http://185.59.220.178:25461/XXXXXXXXXX/XXXXXXXXXXXX/5723?>

6344 IN: Sony Sab HD

Url : <http://185.102.218.53:25461/XXXXXXXXXXXX/XXXXXXXXXXXX/17104?>

6466 IN: Sony TV HD

Url : <http://185.102.218.53:25461/XXXXXXXXXXXX/XXXXXXXXXXXX/17102?>

6478 IN: Sony Sab

Url : <http://195.181.173.91:25461/XXXXXXXXXX/XXXXXXXXXXXX/313?>

6484 IN: Sony Six SD

Url : <http://77.83.117.36:25461/XXXXXXXXXXXX/XXXXXXXXXXXX/325?>

9417 IN: Sony Setmax HD

Url : <http://185.59.220.103:25461/XXXXXXXXXXXX/XXXXXXXXXXXX/1?>

9418 IN: Sony Ten 1 HD

Url : <http://77.83.117.36:25461/XXXXXXXXXXXX/XXXXXXXXXXXX/29549?>

9419 IN: Sony Ten 2 HD

Url : <http://195.181.170.48:25461/XXXXXXXXXX/XXXXXXXXXXXX/29548?>

9420 IN: Ten 3 HD

Url : <http://195.181.170.48:25461/XXXXXXXXXXXX/XXXXXXXXXXXX/29547?>

Please find below :

Letter of MSM Asia Limited(Sony Network) channels Authorization PDF file download link :

http://dmca.yupptv.com/Sony_Network_Channels_PPT%27s_2019/Sony_Networks_Authorization%20letter_Yupp%20TV.PDF

Express IPTV MSM Asia Limited(Sony Network)channels piracy PDF file download link :

[http://dmca.yupptv.com/DMCA/BOSS\(MAG%20322W1\)_IPTV_AUS_%20IP_SONY_NETWORK_CHANNELS_PDF_2nd_June2020.pdf](http://dmca.yupptv.com/DMCA/BOSS(MAG%20322W1)_IPTV_AUS_%20IP_SONY_NETWORK_CHANNELS_PDF_2nd_June2020.pdf)

Accordingly, YuppTV USA Inc requests that you act immediately and force Boss IPTV to remove or disable MSM Asia Limited(Sony Network) from Boss IPTV with Server IP: 185.59.220.187, 185.102.219.69,185.59.220.103, 185.246.210.115, 185.59.220.178, 85.102.218.53, 195.181.173.91.and 195.181.170.48 or suspend their CDN with server IP :185.59.220.187,

185.102.219.69, 185.59.220.103, 185.246.210.115, 185.59.220.178, 85.102.218.53, 195.181.173.91, and 195.181.170.48 to the unauthorized videos being displayed and/or disseminated through Boss IPTV.

I hereby state that YuppTV USA Inc owns the rights referenced above and I hereby state that I have a good faith belief that use of the content in the manner complained of is not authorized by the Channels owner, its agents, or the law.

I Mamidipudi Venkata prabhakar, as a representative of YuppTV USA Inc. hereby digitally sign this e-mail message under penalty of perjury, that the information in the notification is accurate.

If you have any questions, please contact the undersigned at the contact information provided below.

Mamidipudi Venkata prabhakar
YuppTV USA Inc
11175 Cicero Drive,
Suite 100 Alpharetta, GA 30022
+16784583705



Reg.Notice of Copyright Infringement on behalf of Asia Today Singapore Pte Ltd.(Zee Network) from YUPPTV.

From Anti Piracy <antipiracy@yupptv.com>

Date Fri 19-06-2020 01:22

To Cdn77.com - Abuse Department <abuse@cdn77.com>; Security - DataPacket <security@datapacket.com>

Cc Sudheer Kumar Bompelly <sudheerb@yupptv.com>; Uday Reddy <uday@yupptv.com>; zdenek@superhosting.cz <zdenek@superhosting.cz>; Šimon Rybišár <simon.rybisar@cdn77.com>

This letter is to notify you, pursuant to the Digital Millennium Copyright Act ("DMCA") of 1998 by making available (sharing) copyrighted material over the internet and The General Data Protection Regulation (GDPR) Law, Boss IPTV is showing copyrighted materials. So, Boss IPTV is infringing copyrighted materials whose CDN is hosted on dedicated IP address : 185.59.220.103, 185.102.218.53, 185.59.220.178 and 195.181.173.91 which belongs to Datacamp Limited. So, Boss IPTV is misusing Datacamp Limited dedicated server platforms and infringing copyrighted materials.

Specifically, YuppTV.com a product of YuppTV USA Inc, YuppTV USA Inc owns the rights to take anti piracy actions on behalf of Zee network channels for commercial and promotional purposes and all its intellectual property of the all Live/VOD/ On Demand contents/ All channels and its member teams, including, but not limited to, all moving images and other audio/video content featuring. The channels hosted on Boss IPTV is being displayed and/or disseminated Zee Network channels feed without the permission or authorization of YuppTV USA Inc or Asia Today Singapore Pte Ltd (Zee Network). We checked this all given links in Australian IP address. For more details go through authorization letter.

Please find the below Urls and its IP address to be removed:

Server IP's : 185.59.220.103, 185.102.218.53, 185.59.220.178 and 195.181.173.91

Channel URL's:

Channel Name : 6275 IN: ZEE NEWS

Url : <http://185.59.220.103:25461/XXXXXXXXXX/XXXXXXXXXX/871?>

Channel Name : 6408 IN: ZEE CINEMA HD

Url : <http://185.102.218.53:25461/XXXXXXXXXX/XXXXXXXXXX/17110?>

Channel Name : 6531 IN: AND TV HD

Url : <http://185.59.220.178:25461/XXXXXXXXXX/XXXXXXXXXX/3252?>

Channel Name : 6533 IN: ZEE TALKIES

Url : <http://195.181.173.91:25461/XXXXXXXXXX/XXXXXXXXXX/321?>

Please find below :

Letter of Asia Today Singapore Pte Ltd (Zee Network). Authorization PDF file download link :

http://dmca.yupptv.com/DMCA/Authorization_Letter_Anti_Piracy_dt_11042020_Zee_network.pdf

Boss IPTV Asia Today Singapore Pte Ltd (Zee Network)channels piracy PDF file download link :

[http://dmca.yupptv.com/DMCA/BOSS\(MAG%20322W1\)_IPTV_AUS_%20IP_ZEE_NETWORK_CHANNELS_PPT_DATACAMP_CDN_16th_JUNE2020.pdf](http://dmca.yupptv.com/DMCA/BOSS(MAG%20322W1)_IPTV_AUS_%20IP_ZEE_NETWORK_CHANNELS_PPT_DATACAMP_CDN_16th_JUNE2020.pdf)

Therefore, YuppTV USA Inc. once again requests that you take immediate action and terminate Boss IPTV's IP's accounts, on the basis that Boss IPTV has been repeatedly infringing Asia Today Singapore Pte Ltd (Zee Network) channels with Datacamp Ltd platforms and this time with Server IP: 185.59.220.103, 185.102.218.53, 185.59.220.178 and 195.181.173.91 to the unauthorized videos being displayed and/or disseminated through Boss IPTV.

I hereby state that YuppTV USA Inc owns the rights referenced above and I hereby state that I have a good faith belief that use of the content in the manner complained of is not authorized by the Channels owner, its agents, or the law.

I Mamidipudi Venkata prabhakar, as a representative of YuppTV USA Inc. hereby digitally sign this e-mail message under penalty of perjury, that the information in the notification is accurate.

If you have any questions, please contact the undersigned at the contact information provided below.

Mamidipudi Venkata prabhakar

YuppTV USA Inc
11175 Cicero Drive,
Suite 100 Alpharetta,GA 30022
+16784583705



Reg.Notice of Copyright Infringement on behalf of Asia Today Singapore Pte Ltd.(Zee Network) from YUPPTV.

From Anti Piracy <antipiracy@yupptv.com>

Date Thu 04-06-2020 00:58

To security@datapacket.com <security@datapacket.com>

Cc zdenek@superhosting.cz <zdenek@superhosting.cz>; simon.rybisar@cdn77.com <simon.rybisar@cdn77.com>; Sudheer Kumar Bompelly <sudheerb@yupptv.com>; Uday Reddy <uday@yupptv.com>; jiri@superhosting.cz <jiri@superhosting.cz>

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Specifically, Yupptv.com a product of YupptTV USA Inc, YupptTV USA Inc owns the rights to take anti piracy actions on behalf of Zee network channels for commercial and promotional purposes and all its intellectual property of the all Live/VOD/ On Demand contents/ All channels and its member teams, including, but not limited to, all moving images and other audio/video content featuring. The channels hosted on Boss IPTV is being displayed and/or disseminated Zee Network channels feed without the permission or authorization of YupptTV USA Inc or Asia Today Singapore Pte Ltd (Zee Network). We checked this all given links in Australian IP address. For more details go through authorization letter.

Please find the below Urls and its IP address to be removed:

Server IP's : 185.59.220.187, 185.102.219.69, 185.59.220.103, 185.102.218.53, 185.102.219.151, 85.59.220.178, 185.59.222.189, 185.59.220.183, 195.181.170.36, 195.181.173.91, 195.181.170.48 and 185.102.218.35

Channel URL's:

2504 IN: Kan Zee Talkies FHD

Url : <http://185.59.220.187:25461/XXXXXXXXX/X/XXXXXXXXXX/54238?>

2505 IN: Tam Zee Tamil FHD

Url : <http://185.59.220.187:25461/XXXXXXXXX/XXXXXXXXXX/54236?>

2506 IN: Tel Zee Telugu FHD

Url : <http://185.59.220.187:25461/XXXXXXXXX/XXXXXXXXXX/54235?>

2510 IN: Mar Zee Marathi FHD

Url : <http://185.59.220.187:25461/XXXXXXXXX/XXXXXXXXXX/54234?>

2512 IN: Hin Zee Cinema FHD

Url : <http://185.59.220.187:25461/XXXXXXXXXX/XXXXXXXXXXXX/54230?>

2533 IN: Teg Zee Cinemalu FHD

Url : <http://185.102.219.69:25461/XXXXXXXXXX/XXXXXXXXXXXX/54091?>

2610 IN: Hin AndPictures FHD

Url : <http://185.102.219.69:25461/XXXXXXXXXXXX/XXXXXXXXXXXX/54095?>

2612 IN: Hin AndTV FHD

Url : <http://185.102.219.69:25461/XXXXXXXXXX/XXXXXXXXXXXX/54091?>

2639 IN: And TV HD

Url : <http://185.59.220.103:25461/XXXXXXXXXX/XXXXXXXXXXXX/54061?>

2640 IN: And Pictures HD

Url : <http://185.59.220.103:25461/XXXXXXXXXX/XXXXXXXXXXXX/54061?>

2653 IN: Zee Cinema HD

Url : <http://185.59.220.103:25461/XXXXXXXXXX/XXXXXXXXXXXX/54060?>

2680 BD: Zee Bangla HD

Url : <http://185.59.220.103:25461/XXXXXXXXXXXXXXXX/XXXXXXXXXXXX/54029?>

2702 IN: Zee Talkies HD

Url : <http://185.59.220.103:25461/XXXXXXXXXX/XXXXXXXXXXXX/54020?>

6220 IN: Zee TV UK

Url : <http://185.59.220.103:25461/XXXXXXXXXX/XXXXXXXXXXXX/53997?>

6221 IN: Zee News

Url : <http://185.102.219.69:25461/XXXXXXXXXX/XXXXXXXXXXXX/871?>

6224 IN: Zing TV

Url : <http://185.102.218.53:25461/XXXXXXXXXXXX/XXXXXXXXXXXX/874?>

6226 IN: Zee TV ME

Url : <http://185.102.219.151:25461/XXXXXXXXXX/XXXXXXXXXXXX/1050?>

6230 IN: Zee Classic

Url : <http://185.59.220.178:25461/XXXXXXXXXXXX/XXXXXXXXXXXX/877?>

6232 IN: Zee Business

Url : <http://185.59.222.189:25461/XXXXXXXXXXXX/XXXXXXXXXXXX/1056?>

6233 IN: Zee Bollywood

Url : <http://185.59.222.189:25461/XXXXXXXXXXXX/XXXXXXXXXXXX/879?>

6234 IN: Zee Anmol

Url : <http://185.59.222.189:25461/XXXXXXXXXX/XXXXXXXXXXXXXXXX/1057?>

6235 IN: Zee Action

Url : <http://185.59.222.189:25461/XXXXXXXXXXXXXXXX/XXXXXXXXXX/879?>

6273 IN: VIP Zee Cinema HD

Url : <http://185.59.222.189:25461/XXXXXXXXXX/XXXXXXXXXXXXXXXX/880?>

6327 IN: Zee Punjabi

Url : <http://185.59.220.103:25461/XXXXXXXXXX/XXXXXXXXXX/6206?>

6328 IN: And Pictures HD

Url : <http://185.59.220.183:25461/XXXXXXXXXX/XXXXXXXXXX/16997?>

6329 IN: And TV HD

Url : <http://185.102.218.53:25461/XXXXXXXXXX/XXXXXXXXXX/17111?>

6345 IN: Zee Cinema HD

Url : <http://185.102.218.53:25461/XXXXXXXXXX/XXXXXXXXXX/17110?>

6430 IN: Tamil Zee Tamizh (Zee ETC)

Url : <http://195.181.173.91:25461/XXXXXXXXXX/XXXXXXXXXX/8762?>

6479 IN Zee Talkies

Url : <http://185.59.220.178:25461/XXXXXXXXXX/XXXXXXXXXX/3252?>

6480 IN: Zee Marathi

Url : <http://185.59.222.189:25461/XXXXXXXXXX/XXXXXXXXXX/76?>

6481 IN: Zee HD

Url : <http://185.102.219.150:25461/XXXXXXXXXX/XXXXXXXXXX/75?>

9329 IN: Zee Telugu

Url : <http://195.181.170.36:25461/XXXXXXXXXX/XXXXXXXXXX/869?>

9423 IN: Zee Marathi HD

Url : <http://185.59.220.187:25461/XXXXXXXXXX/XXXXXXXXXX/28969?>

9424 IN: Zee Talkies HD

Url : <http://195.181.170.48:25461/XXXXXXXXXX/XXXXXXXXXX/29541?>

9425 IN: Zee TV HD

Url : <http://195.181.170.48:25461/XXXXXXXXXX/XXXXXXXXXX/29540?>

9764 IN: Zee Anmol Cinema

Url : <http://185.59.220.183:25461/XXXXXXXXXX/XXXXXXXXXX/29544?>

9773 IN: Zee Kannada

Url : <http://185.102.218.35:25461/XXXXXXXXXX/XXXXXXXXXX/31866?>

Please find below :

Letter of Asia Today Singapore Pte Ltd (Zee Network).Authorization PDF file download link :

http://dmca.yupptv.com/DMCA/Authorization_Letter_Anti_Piracy_dt_11042020_Zee_network.pdf

Boss IPTV Asia Today Singapore Pte Ltd (Zee Network)channels piracy PDF file download link :

[http://dmca.yupptv.com/DMCA/BOSS\(MAG%20322W1\)_IPTV_AUS_%20IP_ZEE_NETWORK_CHANNEL_LS_PDF_2nd_June2020.pdf](http://dmca.yupptv.com/DMCA/BOSS(MAG%20322W1)_IPTV_AUS_%20IP_ZEE_NETWORK_CHANNEL_LS_PDF_2nd_June2020.pdf)

Accordingly, YuppTV USA Inc. requests that you act immediately and force Boss IPTV to remove or disable Asia Today Singapore Pte Ltd (Zee Network) from Boss IPTV with Server IP: 185.59.220.187, 185.102.219.69, 185.59.220.103, 185.102.218.53, 185.102.219.151, 85.59.220.178, 185.59.222.189, 185.59.220.183, 195.181.170.36, 195.181.173.91, 195.181.170.48 and 185.102.218.35 or suspend their CDN with server IP :185.59.220.187, 185.102.219.69, 185.59.220.103, 185.102.218.53, 185.102.219.151, 85.59.220.178, 185.59.222.189, 185.59.220.183, 195.181.170.36, 195.181.173.91, 195.181.170.48 and 185.102.218.35 to the unauthorized videos being displayed and/or disseminated through Boss IPTV.

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I Mamidipudi Venkata prabhakar, as a representative of YuppTV USA Inc. hereby digitally sign this e-mail message under penalty of perjury, that the information in the notification is accurate.

If you have any questions, please contact the undersigned at the contact information provided below.

Mamidipudi Venkata prabhakar
YuppTV USA Inc
11175 Cicero Drive,
Suite 100 Alpharetta,GA 30022
+16784583705