

IN THE HIGH COURT OF JUDICATURE AT BOMBAY

ORDINARY ORIGINAL CIVIL JURISDICTION

INTERIM APPLICATION NO. <sup>(2) 1231</sup> OF 2023

IN  
SUIT NO. <sup>(1) 1227</sup> OF 2023

Piramal Capital and Housing  
Finance Limited & Anr.

...Applicants

In the matter between:

Piramal Capital and Housing  
Finance Limited & Anr.

...Plaintiffs

Versus

Unknown Defendant No. 1 and Ors.

...Defendants

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IN THE HIGH COURT OF JUDICATURE AT BOMBAY  
ORDINARY ORIGINAL CIVIL JURISDICTION

~~IA~~ <sup>Q</sup> ~~SUIT~~ NO. 1281 OF 2022

Piramal Capital and Housing Finance Ltd.

& Anr.

... Plaintiffs

Versus

Unknown Defendant No.1 & Ors.

... Defendants

PROFORMA

Office Notes, Office Memorandum of Coram, appearance, Court's orders or direction and Prothonotary's Orders.	Court's or Judge's Orders

II

Office Notes, Office Memorandum of Coram, appearance, Court's orders or direction and Prothonotary's Orders.	Court's or Judge's Orders

Office Notes, Office Memorandum of Coram, appearance, Court's orders or direction and Prothonotary's Orders.	Court's or Judge's Orders



**IN THE HIGH COURT OF JUDICATURE AT BOMBAY**

**ORDINARY ORIGINAL CIVIL JURISDICTION**

**INTERIM APPLICATION NO. OF 2022**

**IN**

**SUIT NO. OF 2022**

**PIRAMAL CAPITAL AND )**

**HOUSING FINANCE LIMITED )**

A company registered under the )

provisions of the Companies Act, )

1956 having its registered office at: )

4th Floor, Piramal Tower, Peninsula )

Corporate Park Ganpatrao Kadam )

Marg, Lower Parel Mumbai )

Maharashtra: 400013. )

**AJAY G. PIRAMAL )**

Indian Inhabitant, Occu: Business, )

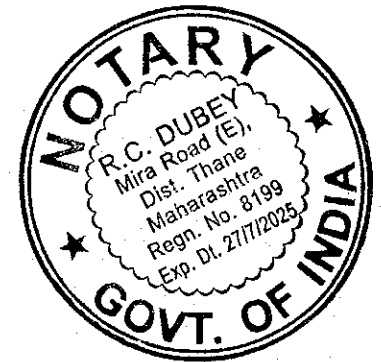
Having his office at: 4th Floor, )

Piramal Tower, Peninsula Corporate )

Park Ganpatrao Kadam Marg, )

Lower Parel Mumbai Mumbai: )

400013. )



**...APPLICANTS**

*R*

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**IN THE MATTER BETWEEN:**

**1. PIRAMAL CAPITAL AND )  
HOUSING FINANCE LIMITED )**

A company registered under the )  
provisions of the Companies Act, )  
1956 having its registered office at: )  
4th Floor, Piramal Tower, Peninsula )  
Corporate Park Ganpatrao Kadam )  
Marg, Lower Parel Mumbai )  
Maharashtra: 400013. )

**2. AJAY G. PIRAMAL )**

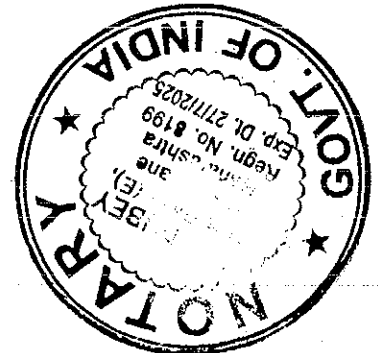
Indian Inhabitant, Occu: Business, )  
Having his office at: 4th Floor, )  
Piramal Tower, Peninsula Corporate )  
Park Ganpatrao Kadam Marg, )  
Lower Parel Mumbai Mumbai: )  
400013. )

**...PLINTIFFS**

**VERSUS**

**1. UNKNOWN DEFENDANT NO. 1 )**

a.k.a. Ravi Pratap Singh a.k.a. Ravi )  
Singh )  
Age: Unknown, Address: Unknown, )

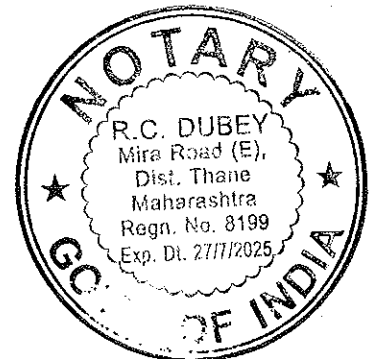


*[Handwritten signature]*



Twitter Ids: @Ravipratap66 )  
 @Ravipratap333 @Ravipratap1111 )  
 Instagram Id: ravipratap11221122 )

2. **UNKNOWN DEFENDANT NO. 2** )  
 a.k.a. MR S.R.PAL C.A.I.I.B & EX- )  
 BANKER Age: Unknown, Address: )  
 Unknown, Twitter Id: )  
 @BandanaMrs. )
3. **UNKNOWN DEFENDANT NO. 3** )  
 a.k.a. MRoy )  
 Age: Unknown, Address: Unknown, )  
 Twitter Id: @MRoy )
4. **UNKNOWN DEFENDANT NO. 4** )  
 a.k.a. Amit Kumar )  
 Age: Unknown, Address: Unknown, )  
 Twitter Id: @AmitKum95654768 )
5. **UNKNOWN DEFENDANT NO. 5** )  
 a.k.a. Ashish )  
 Age: Unknown, Address: Unknown, )  
 Twitter Id: @ashishlinux )
6. **UNKNOWN DEFENDANT NO. 6** )



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a.k.a. Debaprasad Bandyopadhyay )  
Age: Unknown, Address: Unknown, )  
Twitter Id: @@anekanta01 )

**7. TWITTER INC.** )

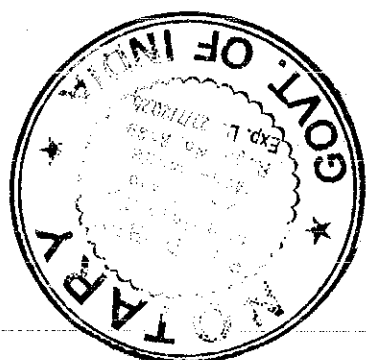
A company registered in the United )  
States of America, having its office )  
office at: 1355 Market Street Suite )  
900 San Francisco, CA 94103 )  
United States )

**8. META PLATFORMS INC.** )

A company registered in the United )  
States of America, having its office )  
at: 1601 Willow Road Menlo Park, )  
CA 94025 United States )

**9. FACEBOOK INDIA ONLINE )  
SERVICES PVT. LTD )**

A Company incorporated under )  
Companies Act, 1956 and having its )  
address at Unit Nos. 1203 & 1204, )  
Level 12, Building No. 20, Rajeha )  
Mindspace, Cyberabad, Madhapur, )  
Hitech City, Hyderabad- 500081 )  
Email: [tvk@fb.com](mailto:tvk@fb.com); )



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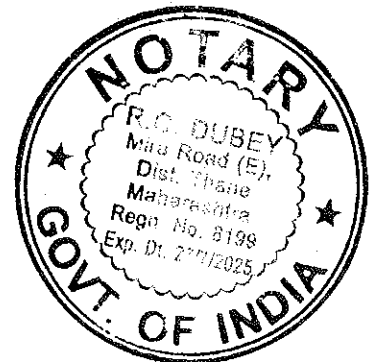
**10. LINKEDIN CORPORATION )**

A Company incorporated under the )  
laws of the United States of )  
America having its registered )  
address at 1000 West Maude )  
Avenue Sunnyvale, CA 94085 USA )  
and branch office address at Fourth )  
Floor North Avenue 3 Maker )  
Maxity, Bandra Kurla Complex, )  
Bandra East, Mumbai, Maharashtra )  
400051 )

**11. LINKEDIN TECHNOLOGY )  
INFORMATION PRIVATE )  
LIMITED )**

A company incorporated under the )  
Companies Act, 1956 and having its )  
address at 16A/20, Wea Main Ajmal )  
Khan Road, Karol Bagh, New Delhi )  
DL 110005 IN )  
and 7th Floor, Tower A, Global )  
Technology Park Devarabisanahalli, )  
Adarsh Palm Retreat Bengaluru )

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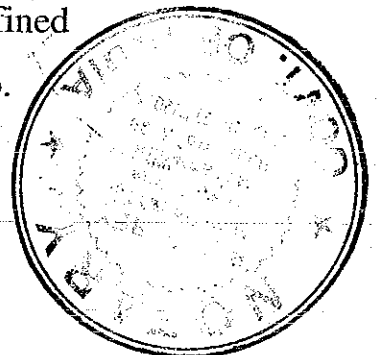
560103 KA IN Email: )

sks2@linkedin.com ) .. DEFENDANTS

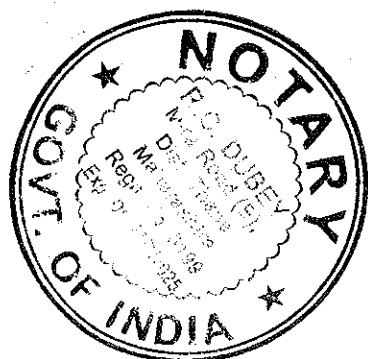
**INTERIM APPLICATION ON BEHALF OF THE**  
**APPLICANTS ABOVE NAMED**

1. The present Suit has been filed by the Applicants against Defendant Nos. 1 to 6 who have engaged in a systematic smear campaign to defame the Applicants in the eyes of the public by making completely false and baseless statements. The defamation complained of in the present Suit has occurred on social media platforms viz. Twitter and Instagram, Facebook and LinkedIn and is available to public at large, which has already caused severe loss and prejudice to the Applicants and is continuing to do so. Further, such wild and baseless allegations have also caused severe damage to the reputation and goodwill of the Applicants, who otherwise enjoy an enviable reputation built in the market over so many years of hard work and ethical behaviour.
2. For the sake of brevity, the facts as set out in the Plaint are not being repeated herein and the Applicant craves leave to refer to the said facts as and when necessary, at the time of the hearing. The meaning ascribed to the words as defined in the Plaint shall continue to have the meaning hereto.

*[Handwritten signature]*



3. The defamation complained of in the present Suit has occurred on social media platforms viz. Twitter and Instagram, Facebook and LinkedIN. Therefore, before proceeding with the facts of the matter, it is necessary to briefly explain the manner in which Twitter, Instagram and Facebook function.
4. Applicant No. 2 is the chairman of the Piramal Group of companies. Applicant No. 2 enjoys the reputation of being a successful entrepreneur and businessman having the highest integrity. He is known for his various philanthropic endeavours and has won several accolades and awards as set out more specifically in the Pleint.
5. The businesses in the Piramal Group are not only successful and profitable but are also reliable brands with a stellar reputation in the eyes of their customers, shareholders and the society at large. It has successful businesses in various sectors including financial services and pharmaceuticals.
6. Applicant No. 1 is a part of the Piramal Group and is engaged in the business of financial services. Applicant No. 1 is a successful and profitable company. In Financial Year 2019-20, Applicant No. 1 had a gross income of Rs. 562,261 Lakhs and profits Profit Before Tax: Rs. 60,187 Lakhs and Profit After Tax: Rs. 3,048 Lakhs CRISIL has



*[Handwritten signature]*

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given Applicant No. 1 the highest possible credit rating of A1+. Applicant No. 1 enjoys a reputation of being an honest, ethical and trustworthy lender for its various customers. This is evident *inter alia* from the following:

- a. Applicant No. 1 recognized as the 'Leading Real Estate Project Finance Company of the year' at the MCHI CREDAI Golden Pillar Awards 2018;
  - b. Applicant No. 1 ranked as No. 4 amongst India's great mid-size workplaces and ranked #1 amongst financial services organizations in the annual survey by Great Place to Work Institute (2017);
  - c. Applicant No. 1 awarded "Best Overall Investment Manager for Real Estate in India" by Euromoney for 4 years in a row – 2015, 2016, 2017 and for the first time in Asia in 2018.
7. The Applicant No. 1 is currently serving 3 lakh customers for all products across country and have extensive branch networks at over 340 locations and we serve over 10,000 pincodes.
8. It is submitted that upon the Applicant No. 1 emerging as the successful resolution applicant of DHFL, it appears that Defendant Nos. 1 – 6 hereinabove have engaged in a complete smear campaign against the Applicants in a blatant attempt to spread falsehoods and damage the

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reputation of the Applicants in the eyes of their customers, shareholders, industry peers and society at large.

9. Defendant No. 1 has through his three Twitter accounts viz. @Ravipratap1111, @Ravipratap66 and @Ravipratap333 and engaged in a systematic smear campaign against the Applicants. This is evident from the following:

- (i) Defendant No. 1 has published 555 tweets or replies from his account @Ravipratap1111 in 122 days starting from 1<sup>st</sup> April 2022 to 31<sup>st</sup> July 2022, 1663 tweets from his account @Ravipratap333 in 122 days from 1<sup>st</sup> April 2022 to 31<sup>st</sup> July 2022 and 32 tweets from his account @Ravipratap66.
- (ii) Each and every single tweet / reply published on this account is in relation to the Applicants. There is no other activity whatsoever in this account.
- (iii) As is explained in greater detail hereinbelow, the contents of the tweets / replies are patently false, baseless and designed to malign the reputation of the Applicants in the eyes of their customers, shareholders, peers and society at large.
- (iv) Further, replies are published to tweets of persons/ or persons are tagged to tweets, who have a large number of followers on Twitter. The objective is to leverage the wide publication and reach of these famous persons for Defendant No. 1's own



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publication and amplify its reach. Defendant No. 1 has regularly tagged / replied to famous Twitter accounts such as:

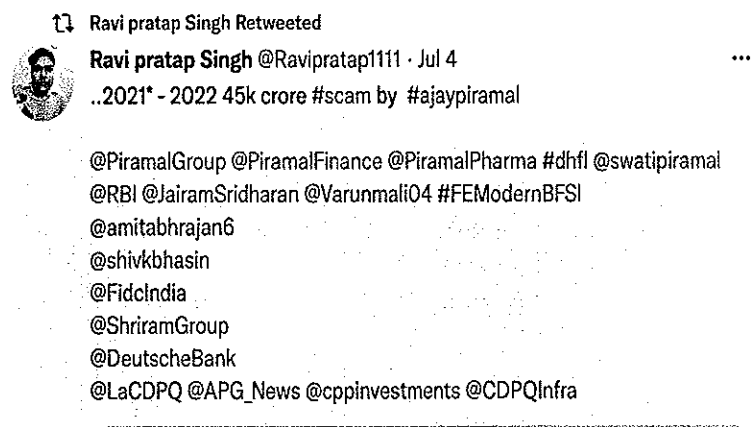
- Public Officials and Institutions such as the Prime Minister of India, Niti Ayog, Finance Ministry whose Twitter accounts are @PMO @ Niti\_Aayog @FinMinIndia
- Newspapers and magazines and such as Financial Express, Money Life, Live Mint, Economic Times, Business Today whose Twitter accounts are @FinancialXpress, @MoneylifeF, @livemint, @EconomicTimes, @business\_today respectively.
- Politicians such as Rahul Gandhi, Sanjay Raut, Narendra Modi, Nirmala Sitharaman whose Twitter account is @sitharamanoffc
- And various other Twitter accounts which have huge number of followers including the Queen of England.

10. Each and every tweet, reply and retweet by Defendant No. 1 from his Twitter accounts are false, *per se* defamatory and designed to damage the reputation of the Applicants. For example, On 4<sup>th</sup> July 2022, Defendant No. 1 published a tweet alongwith images which are in the nature of posters. In the tweet Defendant No. 1 has published as follows:





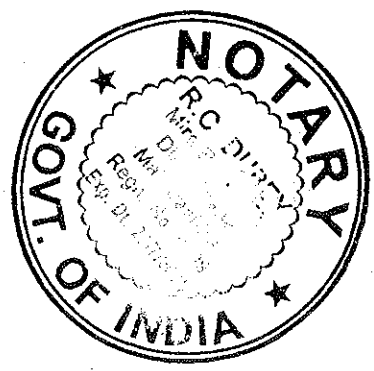
(i) The title of the tweet is: "2021-2022" 45k crore #scam by #ajaypiramal". The title is as follows:



This title is false, baseless and defamatory.

(ii) As explained above, famous persons with large number of followers such as Deutsche Bank, Reserve Bank of India are tagged to the tweet to ensure that the tweet is directed specifically towards them and is visible to their followers.

(iii) The tweet also retweets another earlier tweet by Defendant No. 1 from his other account @Ravipratap333. The contents of this tweet are also visible and are as follows:



*[Handwritten signature]*

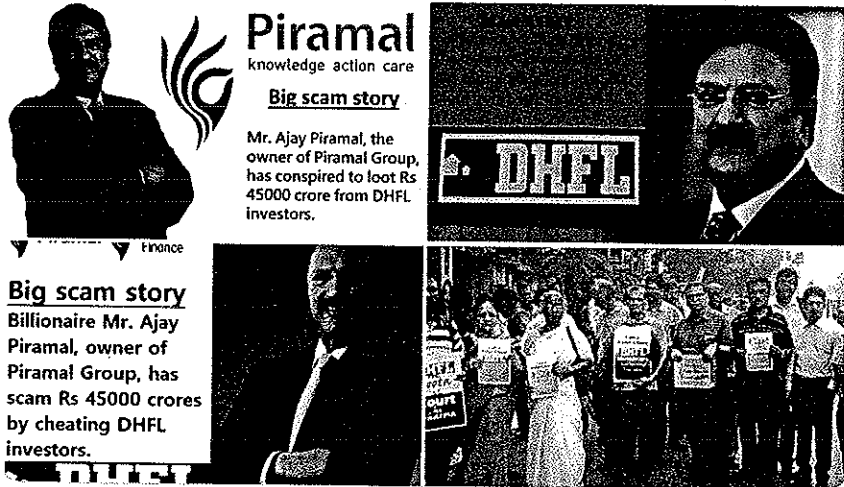
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Ravi pratap @Ravipratap333 · Jun 29

Replying to @PiramalPharma

#45k Cr Big #scam by @PiramalGroup owner #Ajaypiramal has conspired to rob the hard earned money of lakhs of shareholders & FD of #Dhfl with the help of @rskumar1512 & #MukeshAmbani . No justice from any end. We want #Justice from #Ajaypiramal.

@BridgelnvGrp @LaCDPQ @CDPQInfra



The allegation that Applicant No. 2 has “conspired to rob the hard-earned money of lakhs of shareholders and FD of DHFL” is false, baseless and defamatory.

- (iv) Further, each of the images attached with the tweet, which is in the form of posters, also repeats the allegation that Applicant No. 2 has orchestrated a “scam of Rs. 45000 crores by cheating DHFL investors.” One such image is reproduced below:

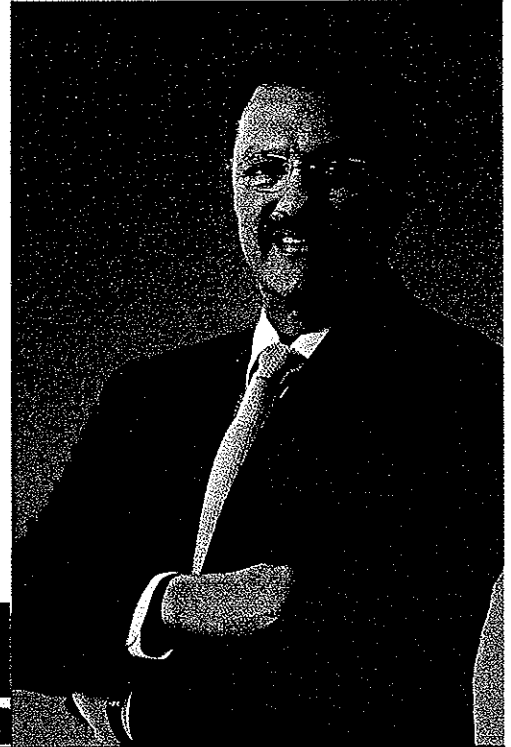


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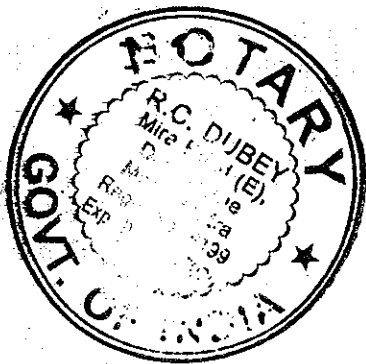
### Big scam story

**Billionaire Mr. Ajay Piramal, owner of Piramal Group, has scam Rs 45000 crores by cheating DHFL investors.**



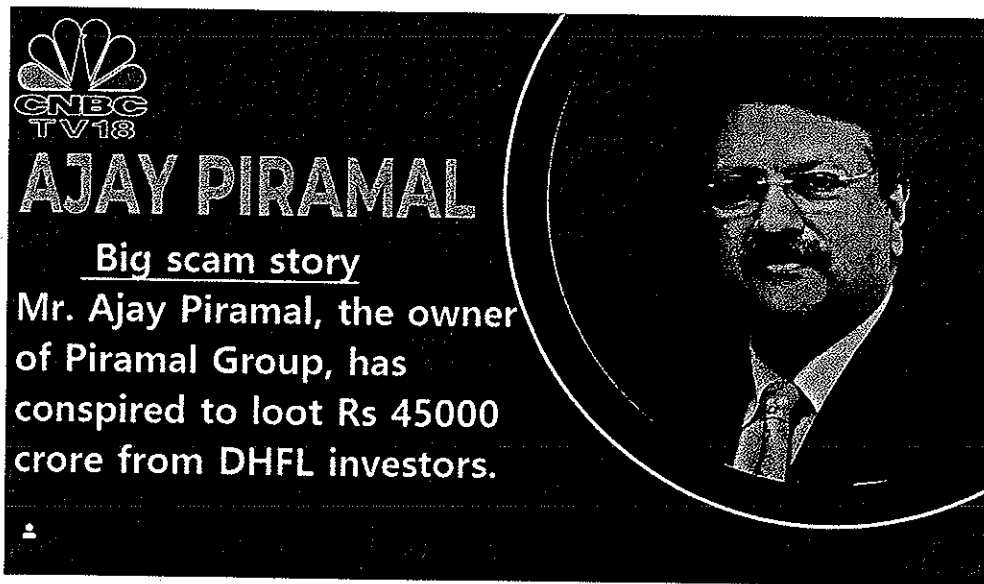
- 11. It is practically impossible to explain how more than 2250 tweets, retweets and replies is defamatory in the Plaint. However, all the tweets, retweets and replies are virtually identical in their form and content and falsely accuse the Applicants of (i) committing a fraud, (ii) committing a scam, (iii) cheating DHFL investors (iv) robbing DHFL investors of Rs. 45,000+ crores (v) engaging in collusion and conspiracy. Further, in these tweets, Defendant No. 1 has referred to Applicant No. 1 as “a big fraud company”. Such allegations are ex-facie defamatory and false.

It is practically impossible for the Applicants to physically annex the 2250 tweets, replies and retweets published by Defendant No. 1 from his Twitter accounts.



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12. Defendant No. 1 has followed an identical modus operandi on Instagram using his account ravipratap1122112. He has published 160 posts from 1<sup>st</sup> April 2022 to 15<sup>th</sup> November, 2022 all of which are almost exclusively with respect to the Applicants. The contents are on the same lines as the tweets and falsely accuse the Applicants of looting / robbing / cheating DHFL investors of Rs. 45,000 crores and engaging in collusion and conspiracy. All these accusations are *per se* defamatory. For example, his post-dated 14<sup>th</sup> July 2022 is reproduced hereinbelow:



Defendant No. 1 even affixes logos of famous news channel such as CNBC TV-18 with the ulterior objective of creating a veneer of credibility to such false accusations.

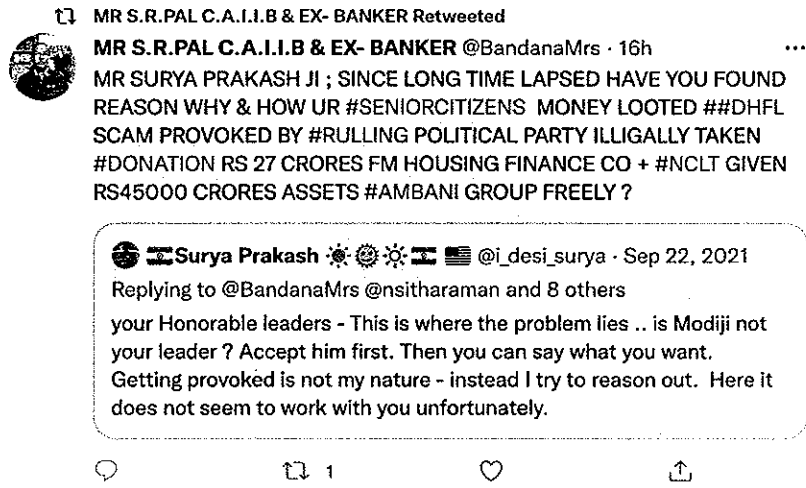
13. Defendant No. 2 has also used his Twitter account @BandanaMrs to defame the Applicants by accusing them of engaging in looting and scamming of DHFL investors.

*[Handwritten signature]*



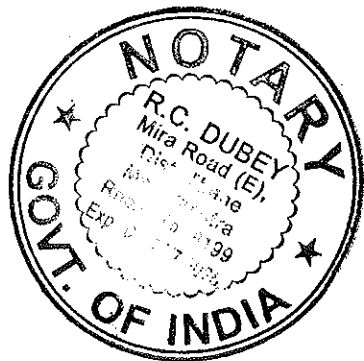
Some examples of defamatory tweets are as follows:

- (i) On 14<sup>th</sup> July 2022, Defendant No. 2 has tweeted as follows:



The reference in this tweet, by imputation is against Applicant No. 1, who is the successful resolution applicant. Needless to state that the Applicants have not looted any senior citizens nor has NCLT given Rs. 45,000 crores of assets to the Applicants freely. Further, Applicant No. 1 is not a part of Ambani Group of companies.

- (ii) On 27<sup>th</sup> April 2022, Defendant No. 2 has tweeted as follows:



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← Tweet



MR S.R.PAL C.A.I.I.B & EX- BANKER  
@BandanaMrs

...

HOW NICE ONE BY ONE #JHUMLA #CAT COMING OUT FROM BAG VIZ IN CASE OF #DHFLSCAM, ASSETS OF #DHFL SOLD TO PRE-FIXED #AMBANI RELATIVE #PIRAMAL GROUP, LOWEST BIDDER RS 34,250 CRORES REJECTING HIGHEST BIDDER OFFER RS 91,158 CRORES + ASSETS RS 45000 CRORES GIVEN FREELY @RE 1 ,WHY? REPLY



Maharshi @Maharshi572000 · Apr 27

Replying to @BandanaMrs and @Wuntakall

Sir I not a legal representative but you must provide legal documents which proves that all tenders ware passing process is fraud

6:50 PM · Apr 27, 2022 · Twitter Web App

1 Retweet 1 Quote Tweet



The tweet seeks to suggest by way of innuendo that the entire process of finalization and approval of resolution plans of DHFL was pre-determined and handed over to the lower bidder, which is *ex-facie* false and per-se defamatory. Further, the suggestion that there was a bid of 90,000 crores, which was rejected is false. Rs. 90,000 crores is the total value of admitted claims i.e. debt due of DHFL. In fact, the liquidation value of DHFL was approx. Rs. 26,000/-

crores, as disclosed in the NCLT order.

(iii) On 31<sup>st</sup> May 2022, Defendant No. 2 published a tweet as follows:



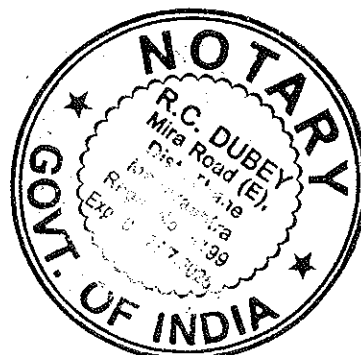
MR S.R. PAL C.A.I.I.B & EX- BANKER  
@BandanaMrs

...

#8YearsOfSeva #8YearsOfNewIndia  
#8yearsOfGaribKalyan : WE SR CITIZENS POOR  
DEPOSITORS OF #DHFLSCAM WANT TO KNOW WHY  
& HOW #ASSETS OF #DHFL SOLD TO #AMBANI  
GROUP: LOWEST BIDDER REJECTING HIGHEST  
BIDDER RATE RS 91,158 CRORES + FREE GIFT RS  
45000 CRORES ASSETS TO #PIRAMAL @RE1? WHY?

The contents are a repetition of the aforesaid allegations in a slightly different format. Needless to state, they are false, baseless and defamatory.

14. From 1<sup>st</sup> April 2022 to 15<sup>th</sup> November, 2022, Defendant No. 2 has published a total of 449 tweets containing the same false and defamatory statements against the Applicants, i.e. in different forms.

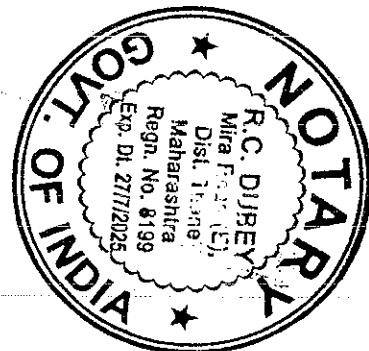


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15. Defendant No. 3 operates their Twitter account @mroy80. Defendant No. 4 operates their Twitter account @AmitKum95654768. From 1st April 2022 to 15<sup>th</sup> November, 2022, Defendant Nos. 3 and 4 have retweeted the defamatory tweets of Defendant Nos. 1 and 2 towards the Applicants 613 times. Defendant Nos. 3 and 4 do not appear to have published any original tweets defaming the Applicants. However, by retweeting the defamatory tweets of Defendant Nos. 1 and 2, they have republished the said defamatory material and given them wider circulation.
16. Defendant No. 5 has adopted a slightly different approach to defame the Applicants. Defendant No. 5 has consistently published defamatory replies to any post made by Applicant No. 1 using its Twitter account: @PiramalFinance starting from April 2022. Some of his published replies are as follows:
- (i) On 9<sup>th</sup> April 2022, Defendant No. 5 has replied to a tweet by Applicant No. 1 wishing a happy ugadi, as follows:

*[Handwritten signature]*







Piramal Finance @PiramalFinance · Apr 2

On the auspicious occasion of గుడి పాడవా, యుగాది, ఉగాది, we wish you success in all your new beginnings!

#GudiPadwa #Ugadi #Festival #NewYear



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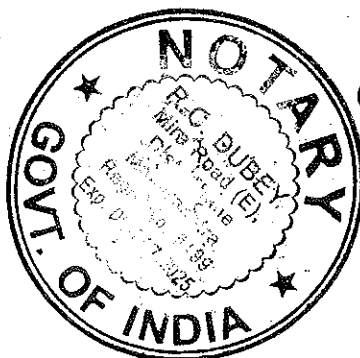


ashish @ashishlinux

Replying to @PiramalFinance

#Fraud #Piramal #DHFL #PiramalFraud

11:31 AM · Apr 9, 2022 · Twitter for Android

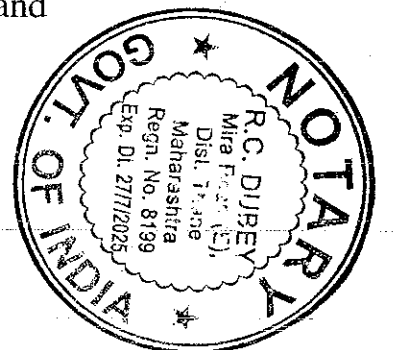


(ii) On 15<sup>th</sup> April 2022, Defendant No. 5 has replied to a tweet by Applicant No. 1 wishing a happy tamil new year as follows:

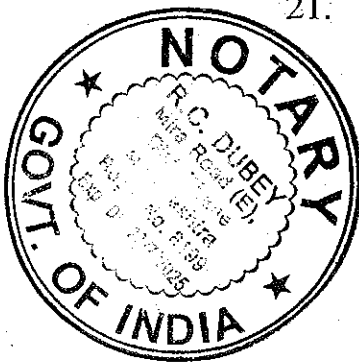
20



17. Therefore, by consistently replying to any tweet by Applicant No. 1 with false, baseless and defamatory words such as “*fraud*”, “*loot*”, “*harassment*”, Defendant No. 5 is attempting to create a bad impression in the minds of the users who Applicant No. 1 tries to reach out to on Twitter. As the replies are public, any message published by Applicant No. 1 is immediately followed by such false and defamatory remarks of Defendant No. 5.



18. Defendant No. 6 operates their Twitter account @anekanta01. From 1<sup>st</sup> April 2022 to 15<sup>th</sup> November, 2022, Defendant No. 6 has tweeted several defamatory statements about Plaintiff Nos. 1 and 2 and has also used hashtags such as “#BoycottPiramal.”
19. As a result of the aforesaid defamatory statements, the Applicants have started receiving various queries and negative feedback from their customers, shareholders and industry peers. Further, the aforesaid defamatory statements are still widely available in public and therefore, tarnishing the Applicants’ reputation at large.
20. The Applicants submit that the Applicants enjoy a spotless reputation with their customers, shareholders, industry peers and in the society at large. Applicant No. 1 is a successful and profitable business and Applicant No. 2 is a globally recognized and celebrated businessman and philanthropist.
21. The Applicants submit that Defendant Nos. 1 to 6 are engaged in a smear campaign against the Applicants and by publishing various tweets, replies, retweets and posts on Twitter, Instagram, Facebook and LinkedIn which are reproduced / listed at Exhibits E to L in the Complaint, are making various false and *per-se* defamatory statements.
22. The Applicants submit that the various tweets, replies,



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retweets and posts by Defendant Nos. 1 to 6 are effectively on the same lines i.e. the Applicant No. 1's acquiring control over DHFL through the IBC process is (i) collusive (ii) fraudulent (iii) a scam and Applicant No. 1 has acquired DHFL at a throwaway price thereby robbing / cheating / stealing from various retail investors and shareholders. However, these statements, allegations are *ex-facie* baseless and false for the reasons stated hereinbelow:

- (i) There is no foul play, fraud, cheating, robbery or corruption in Applicant No. 1's acquisition of DHFL under the IBC. Applicant No. 1's resolution plan was approved after a rigorous competitive process involving 23 other rival applicants.
- (ii) Further, the Plaintiff's Resolution Plan has undergone strict scrutiny by the Administrator and the COC. Applicant No. 1's Resolution Plan has been examined and approved by the NCLT and this approval has been upheld by the NCLAT.
- (iii) Specifically, the Applicants submit that the treatment of fixed deposit holders in the Resolution Plan is also completely legal. Grievances raised by fixed deposit holders were raised before the NCLAT and rejected by the NCLAT after giving detailed reasons.
- (iv) The value given by Applicant No. 1 under the Resolution Plan is significantly higher than the

*D*



liquidation value of DHFL.

(v) Applicants played no role whatsoever in the management of DHFL, prior to the approval of the Resolution Plan. Applicants are not responsible and cannot be held accountable for the fraudulent / illegal acts of the erstwhile promoters of DHFL.

23. The Applicants further submit that not only are the Defendant Nos. 1-6's publications false but they are also malicious and *mala fide*, deliberately made with the ulterior motive of destroying their reputation in the eyes of customers, shareholders, industry peers and society at large. Defendants' publication is fueled by the deliberate intention of ostracizing the Applicants and making them suffer a loss of reputation.

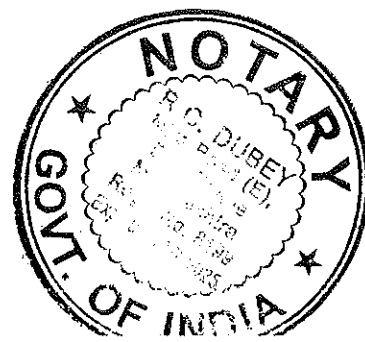
24. The Applicants submit that Defendant Nos. 1 to 6 publications have caused significant harm to the Applicants' reputation. The Applicants are receiving negative feedback and inquiries from customers, shareholders, industry peers and the society at large. The Applicant No. 1 is in the housing finance business where element of trust is essential with customers and lenders. Defendant Nos. 1 to 6's false and defamatory statements are lowering Applicant No. 1's reputation in the eyes of its customers and also the community at large, which will directly affect revenues and growth of Applicant No. 1.



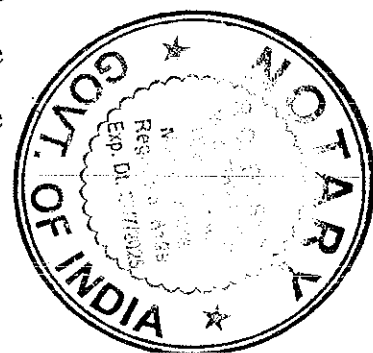
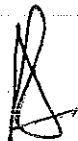
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26. In fact, the Applicants apprehend that Defendant Nos. 1 to 6 will continue to publish defamatory tweets, retweets, replies and posts on Twitter, Instagram and otherwise on social media in furtherance of that agenda. The conduct of Defendant Nos. 1 to 6 as set out herein, leaves no room for doubt that Defendant Nos. 1 to 6 will continue to make such defamatory statements about the Applicants causing further irreparable, harm, loss and injury to the Applicants unless restrained by this Hon'ble Court from doing so. In the circumstances the Applicants are seeking reliefs of taking down the defamatory publications and an injunction against making further such defamatory statements.
27. The Applicants state and submit that the said defamatory allegations and conduct on the part of Defendant Nos. 1 to 6 has already caused severe loss and prejudice to the Applicants and is continuing to do so. Further, such wild and baseless allegations have caused severe damage to the reputation and goodwill of the Applicants, who otherwise enjoy an enviable reputation. It is respectfully prayed that in light of the loss and damage caused to the Applicants, this Hon'ble Court be pleased to order and decree Defendant Nos. 1 to 6 to, jointly and/or severally, pay to the Applicants a sum of Rs. 100,00,00,000/- (Rupees Hundred Crores Only) as and by way of damages, as per the Particulars of Claim.



28. Furthermore, as the hearing and final disposal of the present Suit is likely to take a considerable period of time, during which time, the reputation the Applicants will be irreparably and irreversibly damaged if the defamatory acts on the part of Defendant Nos. 1 to 6 are allowed to continue, it is manifestly necessary, proper and in the interest of justice that pending the hearing and final disposal of the present Suit, In the circumstances the Applicants are seeking ad-interim and interim reliefs of taking down the defamatory publications and an injunction against making further such defamatory statements.
29. The Applicants have made out a fit case for the reliefs as sought for in the present Application and therefore pray that this Hon'ble Court be pleased to grant the said reliefs sought by the Applicants.
30. The Applicants state that in the event the reliefs as sought by the Applicants are not granted, grave and irreparable loss will be caused to the Applicants. On the other hand, no prejudice will be caused to the Defendants if the reliefs as sought for in the present Application are granted by this Hon'ble Court. The Applicants state that the balance of convenience is in favour of the Applicants.
31. In the circumstances, the Applicants submit that the present Interim Application be made absolute with costs. The Applicant undertakes to pay such sum by way of damage

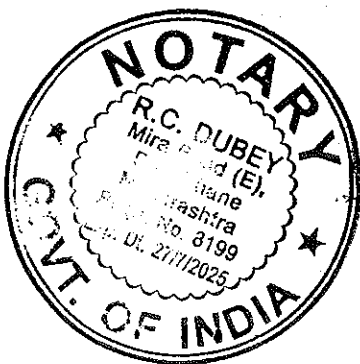




or costs as this Hon'ble Court may award as compensation in the event of a party affected sustaining prejudice by any order that might be made on such Interim Application.

32. The Applicants therefore pray:

- (i) pass an order of temporary injunction restraining the Defendant Nos. 1 to 6, their servants, agents or assigns, or any other person claiming by, through or under them, from in any manner publishing, distributing, disseminating, or making available to the public any defamatory content / whatsoever against the Applicants and/or repeating the defamatory statements published on Twitter and Instagram at Exhibits E to L to the Plaint;
- (ii) order and direct Defendant Nos. 7, 8, 10 and 11 to take down, remove, block, restrict and disable access, on a global basis, to all the defamatory statements referred to in Exhibits E to L of the Plaint.
- (iii) order and direct Defendant Nos. 7, 8, 10 and 11 to take down, remove, block, restrict and disable access, on a global basis, of any further defamatory statements published by Defendant Nos. 1 to 6 or any other person in the form of tweets, retweets, replies or posts which are similar to the defamatory content at Exhibits E to L of the Plaint, within 7 days of being



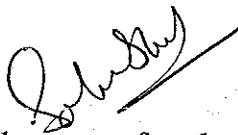
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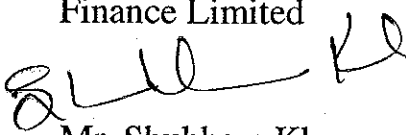
notified of the same by the Applicants

- (iv) Order and direct Defendant Nos. 7, 8, 10 and 11 to handover to the Applicants and / or to this Hon'ble Court any and all details available regarding the true identity of Defendant Nos. 1 to 6 including but not limited to (i) residential address (ii) real name (iii) age (iv) date of birth, (v) e-mail address and (vi) phone number.
- (v) Ad-interim/interim reliefs in terms of prayer clauses (i) to (iv) above;
- (vi) For costs of this Interim Application; and
- (vii) For such further and other reliefs as the nature and circumstances of the case may require.

DSK Legal

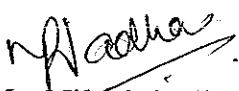
  
Advocates for the Applicants

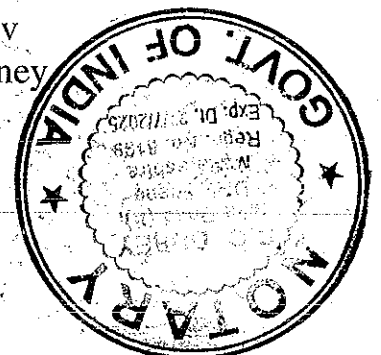
For Piramal Capital and Housing  
Finance Limited

  
Mr. Shubham Khare  
Authorised Signatory  
(Applicant No.1)



For Ajay G. Piramal

  
Mr. Nilesh Jadhav  
Constituted Attorney  
(Applicant No.2)



**VERIFICATION**

I, Mr. Shubham Khare the Authorized representative of the Applicant No. 1 abovenamed, having my office address at 4th Floor, Piramal Tower, Peninsula Corporate Park Ganpatrao Kadam Marg, Lower Parel Mumbai, Maharashtra 400013 do hereby solemnly declare that whatever is stated in paragraphs 1 to 27 is true to my own knowledge and whatever is stated in the remaining paragraphs is based on information and belief and I believe the same to be true.

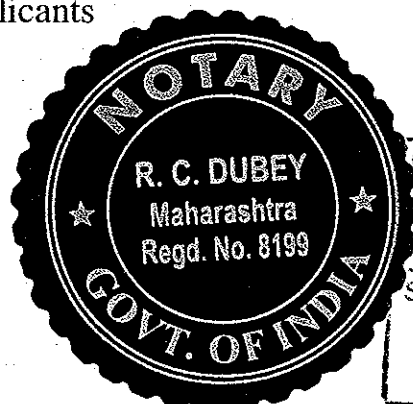
Solemnly declared at Mumbai )  
this day of January, 2023 )  
6 JAN 2023

*Shubham Khare*  
Before me,  
*Mr. Shubham Khare*

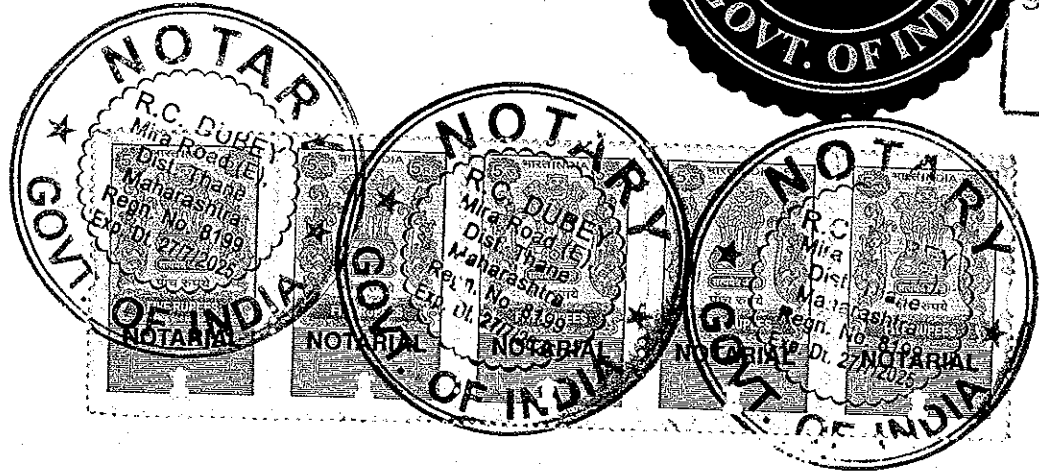


DSK Legal  
*DSK Legal*  
Advocates for the Applicants

**BEFORE ME**  
*R.C. DUBEY*  
**R. C. DUBEY**  
NOTARY  
Maharashtra  
(Govt. of India)



NOTARY  
GOVT. OF INDIA  
63 6/1/2023



6 JAN 2023





महाराष्ट्र MAHARASHTRA

2022

BU 833840

मान मुद्रांक कार्यालय, मुंबई  
प.स.वि.क. ७००००९०  
15 DEC 2022  
सक्षम अधिकारी  
श्री. दि. क. गवई



SPECIAL POWER-OF-ATTORNEY

I, Ajay G. Piramal, S/o. Gopikishan Piramal, R/o. Karuna Sindhu, 96, Khan Abdul Gaffar Khan Road, Siddharth Nagar, Worli, Mumbai, Maharashtra 400018 as Chairman of the Piramal Group of Companies is initiating and / or defending and / or pursuing legal proceedings in India against (1) Unknown Defendant No. 1 a.k.a Ravi Pratap Singh a.k.a. Ravi Singh; (2) Unknown Defendant No. 2 a.k.a. Mr. S.R. Pal C.A.I.I.B & Ex-

AR

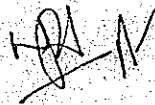
1 A



Banker; (3) Unknown Defendant No. 3 a.k.a. MRoy; (4) Unknown Defendant No. 4 a.k.a. Amit Kumar; (5) Unknown Defendant No. 5 a.k.a. Ashish; (6) Unknown Defendant No. 6 a.k.a. Debaprasad Bandyopadhyay; (7) Twitter Inc.; (8) Meta Platforms Inc.; (9) Facebook India Online Services Pvt. Ltd.; (10) LinkedIn Corporation and (11) LinkedIn Technology Information Private Limited ("Proceedings") and for the purpose of these Proceedings, I am desirous of appointing a fit and proper person to appear and represent me before any and all Courts or forums in India including but not limited to the Supreme Court of India, High Court of any State or Company Law of Board of any State or an Arbitrator or before any Public Officer or a Tribunal, as may be necessary, and do hereby appoint, nominate Mr. NILESH PRAKASH JADHAV (hereinafter referred to as the ("Attorney")), to act for the Company which the Attorney has consented to do.:

**NOW KNOW YE AND THESE PRESENTS WITNESS THAT WE** do hereby nominate, constitute and appoint Mr. NILESH PRAKASH JADHAV, SENIOR MANAGER (*Name & Designation*), residing at 108/9, RAMKRISHNA NAGAR, HASNABAD LANE, NEXT TO KES SCHOOL, KHAR WEST, MUMBAI 400052 to be the true and lawful Attorney in its name and on its behalf to do, perform and execute with respect to the Proceedings from time to time all or any of the following acts, deeds and things, that is to say:

- A. With respect to the Proceedings to appear and represent the Company before all concerned courts, authorities and parties as may be necessary, required or advisable for or in connection with any suit, petition (including, but not limited to winding up petition), action before any Court (civil or criminal) or forum in India including the Supreme Court of India, High Court of any State, or Arbitrator or before any Public Officer or Company Law of Board or the National Company Law Tribunal or other Tribunals, including to commence or defend and/or pursue any action or other proceedings in respect







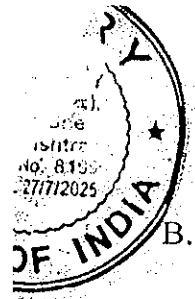
thereof and also to prefer any appeal, review, revision or other proceedings against any order/s passed therein.

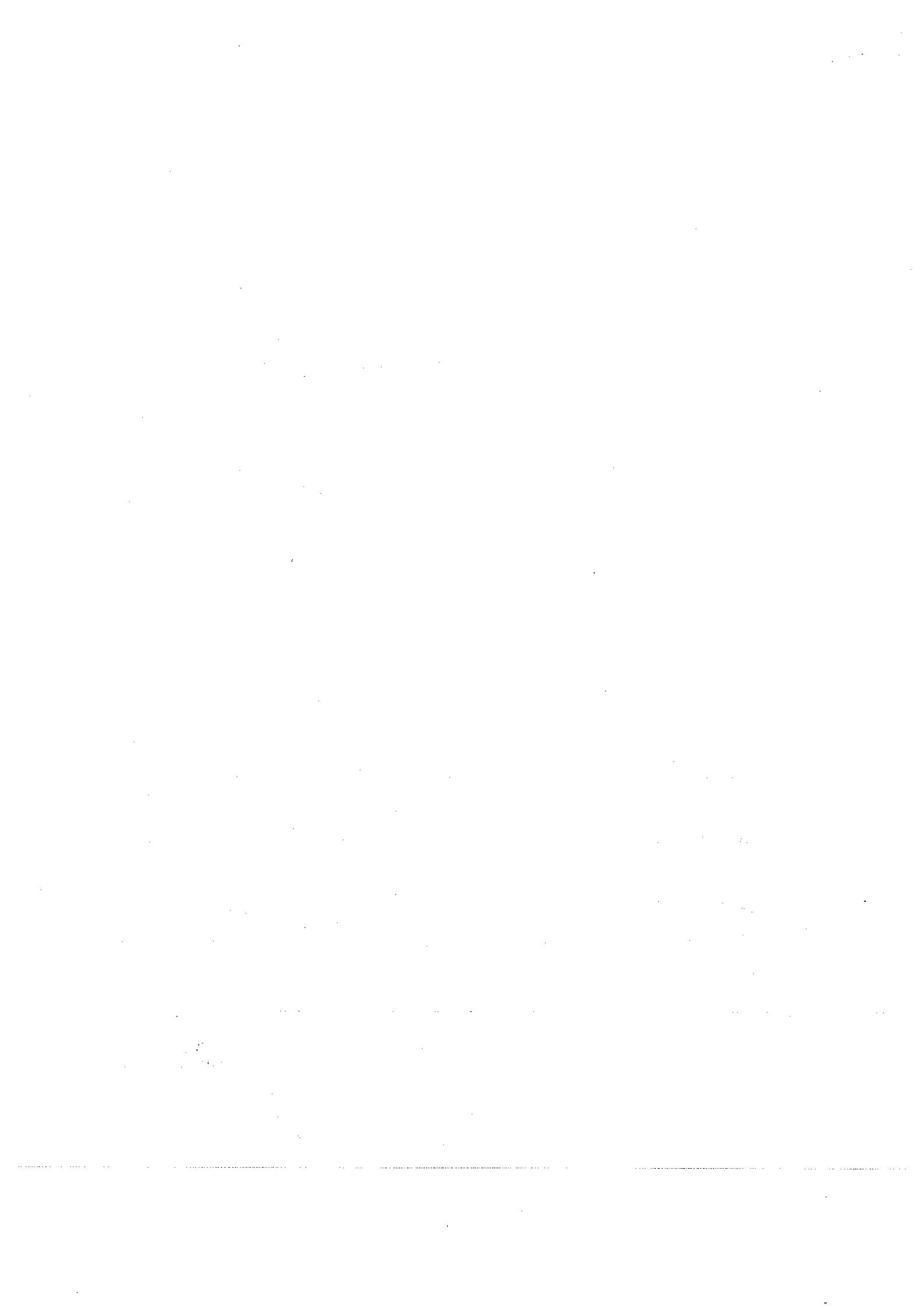
B. To engage Advocate/s, Solicitor/s, legal Advisors, Counsels and/or Arbitrators and to remove him or them and to appoint in their place other Advocate/s, Solicitor/s, Legal Advisers and/or Arbitrator as the Attorney shall deem fit, and to instruct them, and to sign, verify, execute and/or provide the necessary *Vakalatnama*, Complaint, Claims, Petitions, Appeals, Applications, Defenses, Written Statements, Replies, Rejoinders, Affidavits, Evidence and all other documents in any and all courts, tribunals, authorities and officers including in execution of any order, howsoever called, whether of original, appellate or revisional jurisdiction established by lawful authority in India, and papers of every description that may be necessary to be signed, verified and executed by the Company or in the name of the Company or on behalf of the Company for the purpose of the Proceedings and also to accept service of summons, notices or other legal proceedings of any court whatsoever and to act, appear and apply on our behalf in any such court/s or tribunal/s in respect of the Proceedings.

C. **I HEREBY DECLARE** that the Attorney is not authorized to delegate any of his powers hereby conferred and is not permitted to appoint substitutes.

D. **I HEREBY CONFIRM AND RATIFY** all that the said Attorney shall do or cause to be done in pursuance of the purposes herein contained.

E. **I HEREBY FURTHER DECLARE** that the powers hereby conferred shall not be prejudiced, determined nor otherwise affected by the fact of the Company acting either directly or through another agent or attorney in respect of all or any of the purposes herein contained.






F. **THIS POWER OF ATTORNEY** shall remain in full force and effect until revoked by the Grantor, for any reason whatsoever.

I agree that all these acts may be done for me in my name and I agree to ratify all acts, deeds done or executed by my said attorney pursuant to the powers hereby conferred on him, if the same were done or made by me personally.

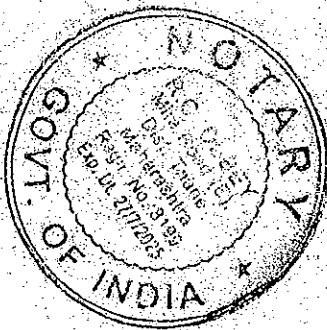
In witness whereof I have hereunto set my hand on this 22<sup>nd</sup> day of December 2022.

  
Ajay G. Piramal

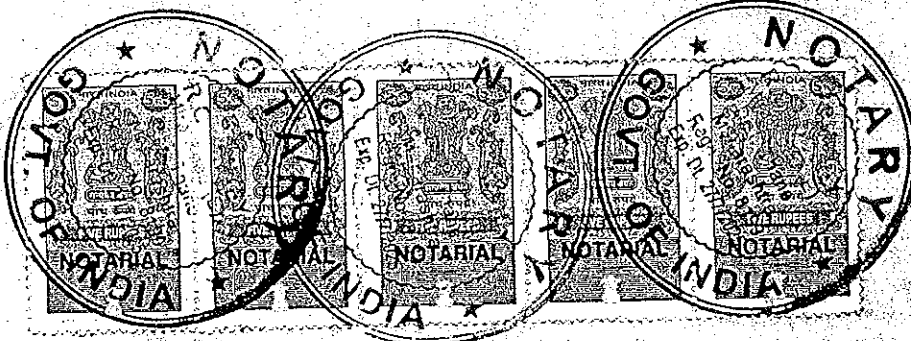
  
(Accepted)


BEFORE ME  
  
**R. C. DUBEY**  
NOTARY  
Maharashtra  
(Govt. of India)

22 DEC 2022



R.C. DUBEY NOTARY GOVT. OF INDIA	
Notary	
Sr. No.	22/12/2022
2352	



TRUE COPY  
  
D. S. LEGA  
ADVOCATE & SOLICITOR



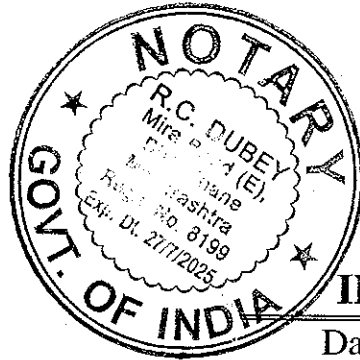


IN THE HIGH COURT OF JUDICATURE  
AT BOMBAY  
ORDINARY ORIGINAL CIVIL  
JURISDICTION  
INTERIM APPLICATION NO. <sup>Q</sup> 1231 OF 2023  
IN  
SUIT NO. <sup>Q</sup> 627 OF 2023

Piramal Capital and Housing  
Finance Limited & Anr. .. Applicants

Versus

Unknown Defendant No. 1  
& Ors. .. Defendants



**INTERIM APPLICATION**

Dated this      day of January, 2023

6 JAN 2023

**DSK Legal,**  
Advocates for the Applicants,  
C-16, Dhanraj Mahal,  
Apollo Bunder,  
Chhatrapati Shivaji Marg,  
Colaba, Mumbai-400 001.