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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

+ CS(COMM) 275/2026

SONAKSHI SINHA

.....Plaintiff

Through: Ms. Anushka Sharda and Mr. Abhi
Udai Singh Gautam, Advocates.

versus

CHARACTER TECHNOLOGIES INC & ORS.Defendants

Through: Mr. Mrinal Ojha, Mr. Debarshi Dutta,
Mr. Arjun Mookerjee and Mr. Shivam Tiwari,
Advocates for D-18.

CORAM:

HON'BLE MS. JUSTICE JYOTI SINGH

ORDER

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20.03.2026

**I.A. 7288/2026 (u/O XI Rule 1 (4) of Commercial Courts Act, 2015 r/w
Section 151 CPC)**

1. This application is filed on behalf of the Plaintiff seeking to place on record additional documents within 30 days.
2. Plaintiff, if she wishes to file additional documents at a later stage, shall do so strictly in accordance with provisions of the Commercial Courts Act, 2015.
3. Application is allowed and disposed of.

I.A. 7289/2026 (u/S 80(2) r/w Section 151 CPC)

4. This application is filed on behalf of the Plaintiff seeking exemption from effecting two months' notice on Defendants No. 22/MeitY and 23/DoT.
5. For the reasons stated in the application, the same is allowed



exempting the Plaintiff from effecting two months' notice on Defendants No. 22/MeitY and 23/DoT.

6. Application stands disposed of.

I.A. 7290/2026 (for pre-institution mediation)

7. This application is filed on behalf of the Plaintiff under Section 12-A of the Commercial Courts Act, 2015 read with Section 151 CPC seeking exemption from Pre-Institution Mediation.

8. Having regard to the facts of the present case wherein urgent relief is prayed for and in light of the judgment of Supreme Court in *Yamini Manohar v. T.K.D. Keerthi, (2024) 5 SCC 815*, as also Division Bench of this Court in *Chandra Kishore Chaurasia v. RA Perfumery Works Private Ltd., 2022 SCC OnLine Del 3529*, exemption is granted to the Plaintiff from Pre-Institution Mediation.

9. Application is allowed and disposed of.

I.A. 7291/2026 (u/S 151 CPC)

10. This application is filed on behalf of the Plaintiff for filing the confidential documents in a sealed cover/envelope.

11. Issue notice.

12. Mr. Mrinal Ojha, learned counsel accepts notice on behalf of Defendant No. 18.

13. For the reasons stated in the application, the same is allowed permitting the Plaintiff to file confidential documents in a sealed cover within 2 days from today.

14. Application stands disposed of.

I.A. 7292/2026 (u/S 151 CPC)

15. This application is filed on behalf of the Plaintiff seeking exemption



from effecting advance service on Defendants No. 1 to 17.

16. For the reasons stated in the application, the same is allowed exempting the Plaintiff from effecting advance service on Defendants No. 1 to 17.

17. Application stands disposed of.

I.A. 7293/2026 (u/S 151 CPC)

18. This application is filed on behalf of the Plaintiff seeking to file lengthy synopsis.

19. For the reasons stated in the application, the same is allowed, permitting the Plaintiff to file the lengthy synopsis before the next date.

20. Application stands disposed of.

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21. Let plaint be registered as a suit.

22. Issue summons.

23. Mr. Mrinal Ojha, learned counsel accepts summons on behalf of Defendant No.18.

24. Written statement shall be filed by Defendant No. 18 within 30 days from today along with affidavit of admission/denial of the documents filed by the Plaintiff.

25. It will be open to the Plaintiff to file replication within 30 days from receipt of the written statement along with affidavit of admission/denial of documents filed by Defendant No. 18.

26. Upon filing of process fee, issue summons to Defendants No. 1 to 17 and 19 to 21 through all permissible modes, returnable before the learned Joint Registrar on 10.04.2026.

27. Summons shall state that the written statements shall be filed by



Defendants No. 1 to 17, 19 to 21 within 30 days from the receipt of summons along with affidavits of admission/denial of the documents filed by the Plaintiff.

28. It will be open to the Plaintiff to file replications within 30 days from the date of receipt of written statements along with affidavits of admission/denial of documents filed by Defendants No. 1 to 17, 19 to 21.

29. If any of the parties wish to seek inspection of any documents, the same be sought and given the timeline prescribed in Delhi High Court (Original Side) Rules, 2018.

30. Learned Joint Registrar will carry out admission/denial of documents and marking of exhibits.

I.A. 7287/2026 (u/O XXXIX Rules 1 and 2 r/w Section 151 CPC)

31. This application is filed on behalf of the Plaintiff under Order XXXIX Rules 1 and 2 read with Section 151 of CPC for grant of *ex parte* ad interim injunction.

32. Issue notice.

33. Mr. Mrinal Ojha, learned counsel accepts notice on behalf of Defendant No.18.

34. Upon filing of process fee, issue notice to Defendants No. 1 to 17 and 19 to 21 through all permissible modes, returnable before Court on 06.07.2026.

35. Case of the Plaintiff as set out in the plaint is that Plaintiff is an established Indian film actress and performer who made her cinematic debut in 2010 in the film Dabangg, where she portrayed the role of “Rajjo” and which gained tremendous commercial success. Plaintiff has featured in multiple commercially successful ventures including ‘Rowdy Rathore’



(2012), 'Son of Sardaar' (2012), 'Dabangg 2' (2012), 'Lootera' (2013) and 'Mission Mangal' (2019) as also in ventures on the digital medium such as the prominent OTT titles 'Dahaad' (2023) and 'Heeramandi: The Diamond Bazaar' (2024).

36. It is stated that Plaintiff has been recipient of many awards and recognitions which include Filmfare Award for best female debut in 2011 for her role in "Dabangg" and Filmfare OTT Award for "Best Actress Drama Series Critics" for her role in "Dahaad", amongst others. Plaintiff has lent her voice to various productions as a voice-over actress including in Hindi language version of 20th Century Fox animated feature film "Rio 2". Plaintiff has considerable following on social media, with approximately 28.6 million followers of "@aslisona" on Instagram, approximately 38 million followers on her official Facebook page, "@sonakshisinhaofficial", and approximately 519 thousand subscribers to her official YouTube channel, "@sonakshisinha".

37. It is stated that Plaintiff has endorsed and is endorsing many brands and products using the goodwill attached to her likeness and has been engaged for promotion by various Indian and multinational brands including Dabur, Puma, ASUS, Colgate, MyGlamm, D'damas, L'oreal, the Rajhans Group, CavinKare, Gitanjali Jewellers, Provogue and Air India. Plaintiff has also parlayed her public persona and credibility into her own business ventures, launching 'SOEZI', a press-on nail brand in 2022 and "EZIMOM" a mother-care brand in 2025.

38. It is stated that Plaintiff's on-screen appearances and commercial endorsements are done through utilisation of attributes of personality/persona such as her name, likeness, signature/autograph, voice, image and



other characteristics that are uniquely identifiable and associated with the Plaintiff and over which she enjoys exclusive rights, as the same form Plaintiff's 'Personality Rights' and/or 'Publicity Rights' and hence, no individual or entity has the right to utilize and/or misappropriate and/or imitate any facet of Plaintiff's personality and/or exploit the same commercially in any manner whatsoever, without the consent or express authorization of the Plaintiff.

39. It is stated that Defendant No. 1 is a company incorporated in Delaware, United States of America and operates an artificial intelligence based online platform, which is hosted on the internet at <https://character.ai/> and associated mobile applications. Defendant No.1's platform allows users to create and interact with chatbots which can present themselves as real world personalities, historical figures, fictional characters etc. The chatbots appear to be able to imitate certain characteristics of the personalities that they claim to be. However, users of the platform can also create characters of their choice with customized traits, sounds and personality traits. These chatbots may carry the likeness, voice or images of real world personalities and historical figures. In particular, the platform allows users a 500-character description for the chatbot's personality and a 4096-character description regarding the scenario in which the chatbot is engaging with the user. Defendant No.1's platform also enables users to create "*Character.AI voices*", whereby users can upload audio clips to create AI enabled chatbots that produce speech using the recorded audio in question.

40. Defendant No. 2 is also a company incorporated in Delaware, USA and operates an online platform located at <https://janitorai.com/>, where it has deployed user-customisable AI chatbots that can present themselves as real



life personalities and generate obscene and objectionable material. Chatbot platforms host multiple chatbots presenting as Plaintiff and imitating Plaintiff's Likeness ('Infringing Chatbots'). Users can interact with the Infringing Chatbots, as if they were interacting with Plaintiff herself. The Infringing Chatbots also allow users to interact with them to generate outputs that are, in many cases, obscene or otherwise objectionable. In the present case, Defendants No. 1 and 2 have deployed multiple chatbots that personate the Plaintiff and imitate Plaintiff's likeness in myriad ways, including by generating lewd and obscene content. Plaintiff has not licensed or authorized her likeness including her voice, images etc. to be used to generate outputs from the infringing chatbots. The infringing chatbots with corresponding URLs are provided in paragraph 20 of the plaint.

41. It is stated that Defendant No. 3 are John Does/Ashok Kumar who are using Plaintiff's name, likeness, image, voice, etc. for unauthorized commercial and impermissible non-commercial purposes including: (i) on Chatbot Platforms; and/or (ii) by selling their goods such as clothing etc. by drawing false association with and endorsement by the Plaintiff. Defendant No. 4 is a company and operates a contemporary Indian jewellery brand hosted on its website <https://www.erastories.in/>, on which it unauthorisedly hosts *inter alia* the images and Plaintiff's likeness in a manner that gives its users the impression that its products are endorsed by the Plaintiff, which is wholly false as Plaintiff has never consented to endorse Defendant No.4's product.

42. It is stated that Defendant No. 5 operates the website hosted at <https://www.preevin.com/>, which is an online retail platform for selling *inter alia* Indian traditional apparel and also operates a physical store. Defendant



No. 5 is hosting and commercially exploiting Plaintiff's likeness in a manner that gives the general public an impression that Plaintiff is endorsing its products, which Plaintiff has never agreed to do. The Domain Name Registrar (DNR) for the website is Defendant No.18/GoDaddy.com, LLC. Defendant No. 6 operates the website hosted at www.blacky.in through which it sells jewellery, Indian ethnic wear such as sarees and other such related products and is using the likeness of the Plaintiff to sell its products. The DNR for Defendant No.6 is Defendant No.19/Endurance Digital Domain Technology Private Limited.

43. It is stated that Defendant No.7 operates website hosted at www.naariclothing.in and sells Indian traditional wear where it is commercially exploiting Plaintiff's likeness and in the absence of details of Defendant No.7, Plaintiff seeks relief against GoDaddy who is DNR of domain name naariclothing.in. Defendant No. 8 operates the website hosted at www.asnowera.co and is engaged in the business of Indian and western outfits. It is using Plaintiff's likeness, giving an impression that its products are endorsed by the Plaintiff. Likewise, Defendants No. 9 to 17 have websites which are using the likeness of the Plaintiff to promote and sell their respective products, as detailed in the plaint. Screenshots along with URLs demonstrating instances of infringement by these Defendants of Plaintiff's likeness are given in the plaint and documents appended thereto.

44. It is further stated that Defendants No. 18 to 21 are DNRs and have been impleaded for the limited purpose of facilitating compliance with the orders of this Court and disclosure of BSI concerning the various websites operated by Defendants No. 4 to 17. Defendants No. 22 and 23 are Ministry of Electronics and Information Technology (MeitY) and Department of



Telecommunications (DoT) respectively and have been impleaded for the limited purpose of securing compliance with orders of this Court and directing Internet Service Providers (ISPs) and intermediaries to take down infringing content, if required.

45. Learned counsel for the Plaintiff submits that Plaintiff is a well known actress in Indian cinema and made her debut in 2010 with the film Dabangg which was a huge commercial success. She has made remarkable contributions to Indian cinema and has a career spanning nearly 16 years where she has demonstrated versatile acting skills and is extremely popular amongst the masses. The infringing chatbots and infringing brands are using Plaintiff's likeness without her permission to promote their products giving an impression to the members of the public that their brands are endorsed by the Plaintiff. The infringers are using various elements of Plaintiff's persona such as her voice, name and images for selling merchandise in order to make unjust commercial gains. Some of the images are most inappropriate and portray the Plaintiff wearing obscene clothing, thereby tarnishing her image and reputation. As explained in the plaint, the chatbot platforms of Defendants No.1 and 2 are hosting multiple chatbots presenting the Plaintiff and imitating her likeness. Users can interact as if they were interacting with the Plaintiff. The chatbots allow users to interact with them to generate outputs which are in many cases obscene or otherwise objectionable. These platforms are private and for-profit corporations that provide their users service for profit basis and Defendant No.1 in particular has received significant venture capital and is clearly monetising the illegitimate, infringing and derogatory use of Plaintiff's likeness including her name, image, voice and personality. It is further urged that Defendant No.3/John



Does are also unauthorizedly exploiting Plaintiff's likeness without any permission or authorization. These infringing websites have lakhs of followers and the content is continuously disseminated and the expanse is very wide. The infringing activities are damaging Plaintiff's goodwill and reputation and the loss and injury caused is irreparable. In this backdrop, it is prayed that *ex parte* ad interim injunction be granted protecting the various rights of the Plaintiff.

46. Having heard learned counsel for the Plaintiff and upon perusal of the documents, I am of the view that Plaintiff has made out a *prima facie* for grant of *ex parte* ad interim injunction against the Defendants. Balance of convenience lies in favour of the Plaintiff and she is likely to suffer irreparable harm in case the interim injunction, as prayed for, is not granted.

47. Plaintiff is a well known and renowned Bollywood actress with an illustrious career spanning over a decade. She played a lead role in Dabangg opposite Sh. Salman Khan and while this was her debut film, she left an indelible mark on the viewers and in the industry, besides the fact that the film was a huge commercial success. Plaintiff is a recipient of prestigious awards such as Filmfare Award and has millions of followers on social media platforms. Plaintiff has brought forth that the Infringing Chatbot platforms are hosting multiple chatbots presenting the Plaintiff and imitating her Likeness, where even users are interacting with the Infringing Chatbots, as if they were interacting with Plaintiff herself and are also generating lewd and obscene or otherwise objectionable content. Other infringing Defendants are using Plaintiff's likeness and other attributes of her personality without her permission and authorisation, to promote their products giving an impression to the members of the public that their brands are endorsed by



the Plaintiff. Some images are wholly inappropriate and portray the Plaintiff wearing obscene clothing, thereby tarnishing her image and reputation.

48. Having perused the documents and screenshots, I am of the *prima facie* view that Defendants No.1 to 17 are unlawfully and illegally exploiting and using various elements of Plaintiff's persona such as her likeness, voice, image etc. for unlawful and unjustified commercial gains, without her consent and/or authorization. Some of these infringers are also hosting images of the Plaintiff with inappropriate clothing and obscene content using AI tools, which is causing irreparable damage to her reputation. As for images showing the Plaintiff as a brand endorser of the merchandise, the additional concern is that if the goods turn out to be of inferior quality, it would be a further debasement of Plaintiff's goodwill and reputation. In case of *Anil Kapoor v. Simply Life India, 2023 SCC Online Del 6914*, this Court has held that a celebrity's right of endorsement acts as a major source of livelihood which cannot be destroyed by permitting unlawful dissemination as sale of merchandise or other articles, bearing the faces or other attributes of their persona, without their lawful authorization.

49. Personality rights have been recognised by this Court in several orders passed from time to time. Plaintiff has a right to protect her name, likeness and all other attributes of her personality and no third party has a right to use these attributes without her consent/authorization. In *Jaikishan Kakubhai Saraf v. Peppy Store and Others, 2024 SCC OnLine Del 3664* and *Aishwarya Rai Bachchan v. Aishwaryaworld.com and Others, 2025 SCC OnLine Del 5943*, this Court held that when attributes of famous personalities are used unauthorisedly, it leads not only to commercial detriment but also impacts his/her rights to privacy/personality and live with



dignity. Surely, Plaintiff is entitled to complain that any content which is set in obscene backdrop or shows her in inappropriate clothing and/or which falsely portrays her as endorsing brands, where there is no authorization and/or which uses attributes and elements of her persona such as her images, voices etc., is liable to be forthwith taken down from the public space. The infringing content, hosted purely for commercial or personal gains, is continuing to cause harm and damage to Plaintiff's formidable goodwill and reputation. In this backdrop, it becomes necessary to restrain the infringing Defendants by an *ex parte* ad interim order and accordingly, following directions are issued:-

- (a) Defendants No. 1 to 17 including John Does, their associates, servants, agents, affiliates, holding companies, assignees, substitutes, representatives, group entities, their subscribers, employees and/ or persons claiming through them or under them are restrained from using and/or in any manner directly or indirectly, exploiting or misappropriating Plaintiff's: (i) name Sonakshi Sinha; (ii) image; (iii) voice; and (iv) likeness and/or any other attribute of her persona, without her authorization or consent, for any commercial and/or personal gain, through the use of technology, including but not limited to Artificial Intelligence, Generative Artificial Intelligence, Machine Learning, Deepfakes, AI Chatbots, Face Morphing and/or any other mediums and formats, amounting to violation of Plaintiff's personality/publicity rights. Defendants are also restrained from selling their merchandise and/or other articles using the elements and attributes of Plaintiff's persona, which are exclusively identified with her and/or from passing off their goods by encashing on the



goodwill and reputation of the Plaintiff and misrepresenting to the public; and

(b) It is further directed that Defendants No.1, 2 and 4 to 17 shall take down the respective URLs mentioned in **Annexure-A** appended to this order within 36 hours of receipt of this order.

50. Plaintiff shall comply with the provisions of Order XXXIX Rule 3 CPC within a period of two weeks from today.

JYOTI SINGH, J

MARCH 20, 2026/S.Sharma



ANNEXURE A

S. No.	Party	Impugned links
1.	Defendant No. 1	<ol style="list-style-type: none"> https://character.ai/chat/DI4hAGHZb_3JCa8I2ygs_s9FEK4CaecWCuEZx92TIKSE https://character.ai/chat/OnFdxMjGRfG9kaDXo0VzeqpPqSPUwj6IbWw-55rYybI https://character.ai/chat/fPQPEiQ-HzHc6m_ijEfpWLSmN32Y8HwCX42zdKwE4yo
2.	Defendant No. 2	<ol style="list-style-type: none"> https://janitorai.com/characters/e0e45afb-8e63-4feb-9486-9f91b3a1bb2c_character-sonakshi-sinha-milf-nepo-kid-indian-mommy https://janitorai.com/characters/c6258f88-ac0f-40aa-9dcd-b484213bacc0_character-sonakshi-sinha
3.	Defendant No. 4	<ol style="list-style-type: none"> https://www.erastories.in/products/moondust-earrings?_pos=2&_psq=Moondust&_ss=e&_v=1.0 https://www.erastories.in/blogs/behind-the-name-unveiling-the-meaning-and-significance-of-erastories-1/bollywood-s-top-stars-swear-by-era-jewelry-here-s-why
4.	Defendant No. 5	<ol style="list-style-type: none"> https://www.preevin.com/ https://www.preevin.com/pages/celebrities https://www.preevin.com/products/copy-of-purple-all-over-embroidered-tower-peplum-sharara-with-dupatta
5.	Defendant No. 6	https://blacky.in/blogs/news/exclusive-collection-sonakshi-sinha-inspired-premium-banarasi-silk-saree?utm



6.	Defendant No. 7	https://www.naariclothing.in/product-page/naari-s-pure-katan-silk-saree-with-chand-butata?utm
7.	Defendant No. 8	https://asnowera.co/products/sonakshi-sinha-black-leaf-co-ord-set
8.	Defendant No. 9	https://www.suvastifashion.in/products/sonakshi-sinha-red-banarasi-silk-saree-for-wedding?srsltid=AfmBOooTNdJY2SnDxQ1U1k2kLYMQu2Jxi_K9JMCp7zq8SyB_Jmu37ca&utm
9.	Defendant No. 10	https://holythread.in/products/pure-mashru-katan-silk-saree-in-red?srsltid=AfmBOooEU3B9RXzFsGrcRtoc3woxMKOqHyF2IhfVwBLYY5kSb6N4f1Zj&utm
10.	Defendant No. 11	https://pearlapparels.in/products/bollywood-inspired-ethnic-saree?utm
11.	Defendant No. 12	https://www.instagram.com/la_valentina143/reels/
12.	Defendant No. 13	1. https://www.instagram.com/p/DREK4coCpuf/ 2. https://www.facebook.com/photo.php?fbid=1434073955391071&set=pb.100063654410154.-2207520000&type=3
13.	Defendant No. 14	https://thecraftsbanaras.com/products/pure-katan-silk-handloom-banarasi-saree-with-sona-rupakadhua-zari-work?srsltid=AfmBOootiEPVCEHto47cQHCFIbwsWTknn7Fgtz9InkiPnHZ6Eswu5_xw
14.	Defendant No. 15	https://thehandlooms.com/products/sonakshi-sinha-in-pure-katan-silk-banarasi-handloom-saree-all-over-motifs?srsltid=AfmBOoqXQaPrr0DIPCa_m3o4e8oaPkrkTKt1vqHxJi2EOdr2PXEjRDJD



15.	Defendant No. 16	https://www.thekaarighars.com/products/black-pure-katan-silk-banarasi-handloom-saree-brocade-copy-copy-copy-copy-copy-copy?variant=49891869557034&country=IN&currency=INR&utm_medium=product_sync&utm_source=google&utm_content=sag_organic&utm_campaign=sag_organic&utm_source=google&utm_medium=cpc&utm_campaign=23475812801&utm_content=&utm_term=%7bsearchterm%7d&gad_source=1&gad_campaignid=23480419426&gclid=CjwKCAiAs4HMBhBJEiwACrfNZfhxUXYJT xEP7kevVweGzCjPW4iGJb0Lc6toppqQhB0BS1TDRB5TjhoCtHUQAvD_BwE
16.	Defendant No. 17	<ol style="list-style-type: none"> 1. https://www.ensembleindia.com/black-silk-crop-jacket-drape-skirt-set/p/442483 2. https://www.ensembleindia.com/red-silk-classic-long-anarkali-set/p/343869#:~:text=Anamika%20Khanna%20Red%20Silk%20Classic,Pink%20Mul%20Chanderi%20Anarkali%20Set