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An e-newsletter from  
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# Articles

Navigating nature's law: India's legal overhaul of biodiversity access and benefit sharing

Patenting antibodies of the future – *De novo* designed antibodies

Section 59 of the Patents Act – The journey so far

## Navigating nature's law: India's legal overhaul of biodiversity access and benefit sharing

The first article in this issue of IPR Amicus examines the recent developments around Biological Diversity, focusing on access to biological resources, intellectual property rights based on the Indian biological resources, and the evolving benefit-sharing mechanisms. Discussing the changes, the authors note that the reforms represent a pivotal shift in India's biodiversity governance, reflecting a deliberate effort to balance

By Dr. Malathi Lakshmikumaran and Aashmeen Kaur

conservation priorities with the promotion of innovation, research, and commercial engagement. According to them, as India continues to refine its biodiversity governance, these reforms mark a pivotal step toward balancing innovation, conservation, sustainable use of biological resources and national interest.

[Read more](#)

## Patenting antibodies of the future – *De novo* designed antibodies

The second article in this issue of the newsletter focuses on *de novo* antibody design. These antibodies are fully developed and selected by AI against specific targets or epitopes while also addressing critical factors like affinity, cross-reactivity, and developability. The authors note that the emergence of *de novo* antibody design intersects with two rapidly evolving areas of patent law—AI and antibodies, raising important questions

By Dr. Joyita Deb and Dr. Malathi Lakshmikumaran

about how to secure effective patent protection given the current challenges in patenting these biologics. According to the authors, certain aspects of the law such as inventorship and patentability would expect to see little change, but aspects such as inventive step and sufficiency would need to be reassessed if innovation in this sector is to be encouraged.

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## Section 59 of the Patents Act – The journey so far

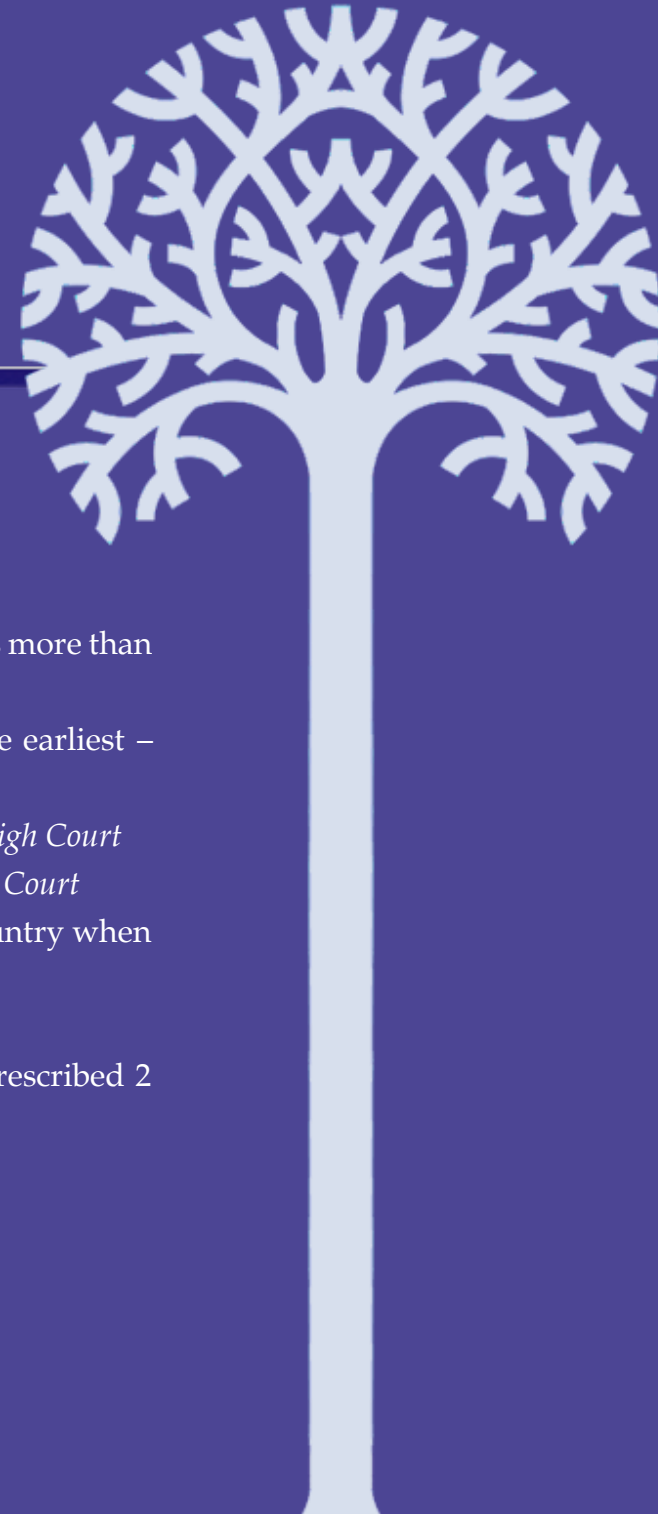
The third article in this issue discusses Section 59 of the Patents Act, which provides supplementary provisions as to amendment of application or specification. It examines how Indian courts have interpreted Section 59 through six recent case law. The authors point out that the decisions underscore the complexities faced by applicants, especially in the context

*By Aashmeen Kaur and Anurag Pandey*

of India's distinct patentability standards, which often diverge from those in other jurisdictions. Further, they highlight few points which still need to be clarified by the Court.

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# Ratio Decidendi



- Patentability under Section 3(e) [admixture] – Applicant to only demonstrate that composition is more than the sum of its parts – Data when not required – *Madras High Court*
- Patents – Cross-examination of opposite party's expert must be exercised diligently and at the earliest – *Delhi High Court*
- Patents – Numerical references in complete specifications or claims cannot be ignored – *Delhi High Court*
- Patents – Pre-grant opposition and patent application are to be heard separately – *Calcutta High Court*
- Trademark infringement suit not maintainable in India in case of mark registered in foreign country when goods bearing the mark also sold from a website registered abroad – *Gujarat High Court*
- Trademarks – Extension of time under Section 131 when can be sought – *Madras High Court*
- Trademarks – No deemed abandonment under Section 45(2) when extension sought within prescribed 2 months – *Madras High Court*

## Patentability under Section 3(e) [admixture] – Applicant to only demonstrate that composition is more than the sum of its parts – Data when not required

The Madras High Court has rejected the objection of the Patent Office under Section 3(e) of the Patents Act, 1970 when data related to pre-lyophilization and post-lyophilization was not provided by the patent applicant in respect of its application for the patent titled '*Lyophilized Therapeutic Peptibody Formulations*'.

Observing that the object of the claimed invention was to increase the stability of the therapeutic peptibody by the process of lyophilization, the Court was of the view that for purposes of establishing synergy, it was sufficient if the appellant-applicant demonstrated interaction between the ingredients and, consequently, that the composition was more than the sum of its parts. According to the Court, data relating to pre-lyophilization and post-lyophilization was not relevant for purpose of Section 3(e).

The High Court in the facts of the case noted that Tables 39 to 41 of the complete specification of the claimed invention contained evidence of synergy between the ingredients of the claimed invention. And, in fact, Table 39 disclosed the synergy from

using at least a threshold concentration of the stabilizing agent/lyoprotectant, sucrose, and Tables 40 and 41 disclosed the anti-aggregation benefit by using the specified concentration of tween-20.

Further, on the question of lack of *inventive step*, the Court discussed number of cited prior arts while donning the mantle of a PSITA, a formulation scientist. Taking note of the number of permutations and combinations, the Court concluded that the composition and concentration of ingredients in the claimed invention would not be obvious unless there is teaching, motivation or suggestion that would lead PSITA to make a mosaic of the cited prior arts.

*The appellant-applicant was represented by Lakshmikumaran & Sridharan Attorneys here. [Amgen INC. v. Assistant Controller of Patents – Judgement dated 22 August 2025 in CMA (PT) No.28 of 2023, Madras High Court]*

## Patents – Cross-examination of opposite party's expert must be exercised diligently and at the earliest

The Delhi High Court has opined that the right to seek cross-examination of the opposite party's expert must be exercised not later than the stage when the evidence is admitted by the

Controller. The Court was of the view that this right does not remain available to the party for all times to come until the issuance of notice of hearing. According to the Court, the right of the party to seek cross-examination of the opposite party's expert must be exercised diligently and at the earliest, after the cause of action has arisen.

The High Court in this regard noted that the principles of natural justice are intended to ensure fairness, and not to serve as a sword of convenience to be wielded at the party's whims and fancies. Petitioner's submission that it realized a need for cross-examining the Respondent's experts only after its own experts filed the rebuttal evidence, was thus held as without any merit.

It may be noted that the High Court also found without merit the submission of the petitioner that the proceedings before the High Court in its earlier writ petition do not constitute a constructive waiver of the right to seek cross-examination. According to the Court, having allowed the earlier writ petitions to attain finality without raising this plea, the Petitioner was now estopped from asserting the right belatedly and the doctrine of waiver operates to bar such an afterthought.

The plea of denial of natural justice was also rejected by the Court while it observed that the petitioner having consciously elected to counter the respondent's expert affidavits through

rebuttal evidence, it cannot now contend that the right of cross-examination has been denied, and such a denial is violation of principles of natural justice.

[*Novartis AG v. Controller of Patents and Designs and Anr.* – Judgement dated 16 September 2025 in W.P.(C)-IPD 50, 51 and 52/2025, Delhi High Court]

## Patents – Numerical references in complete specifications or claims cannot be ignored

The Division Bench of the Delhi High Court has rejected, at the very outset and unequivocally, the contention that numerical references (for understanding the drawings), contained in the complete specifications or in the claims, as granted, can be ignored. The Court was of the view that numerical references in the claims or in the complete specifications, are reliable aids and guides to understanding the scope and ambit of the claims.

The High Court in this regard noted that providing of drawings to understand the scope of the claim is expressly envisaged in Section 10(2) of the Patents Act and that the drawings themselves are not merely pictorial figures but contain various numerical references. According to the Court, thus, the numerical references are an inherent part of the drawings and, inasmuch as the drawings themselves are an inherent part of the complete

specifications of the patent, as contemplated by the Patents Act, the numerical references are of equal significance. The Court thus observed that neither can the drawings be completely understood without alluding to the numerical references, nor would the numerical references make sense, unless one refers to the drawings.

UK Court of Appeal decision in the case of *Virgin Atlantic* was distinguished by the Court here while it observed that the Indian Patents Act and the Rules have no provision similar to Rule 29(7) of the Implementing Regulations to the EPC. WIPO Guidelines and the Rules of the European Patent Office were also relied upon by the Court here.

[*Jay Switches (india) Pvt. Ltd. v. Sandhar Technologies Ltd. & Ors* – Judgement dated 19 August 2025 in FAO(OS) (COMM) 6/2025, Delhi High Court]

### Patents – Pre-grant opposition and patent application are to be heard separately

The Calcutta High Court has observed that pre-grant opposition and an application upon examination are both required to be heard separately, i.e., under Section 25(1) and Section 14, respectively, of the Patents Act, 1970.

Observing that these are distinct compartments as stipulated under the Patents Act and that the objections raised in the FER are different from those raised in the representation under Section 25(1), the High Court was of the view that the Controller must provide separate hearings i.e. (i) to deal with the pre-grant opposition and (ii) to deal with the application under examination, and then pass separate orders dealing with all the aspects in both the cases.

[*UPL Ltd. v. Union of India* – Judgement dated 16 September 2025 in WPA-IPD No.3 of 2024, Calcutta High Court]

### Trademark infringement suit not maintainable in India in case of mark registered in foreign country when goods bearing the mark also sold from a website registered abroad

The Gujarat High Court has answered in negative the question as to when a customer uses such goods from a website which is registered in USA and the mark is also registered in USA, then whether such action would give rise to cause of action of filing of the suit of infringement within the territorial jurisdiction of a Court in India.

According to the Court, for the purpose of establishing that a part of cause of action arose within the jurisdiction of the Court, in India, the plaintiff would have to show that the defendant has purposefully availed the jurisdiction of the Forum Court by entering into a commercial transaction with an internet user located within the jurisdiction of the Forum Court. The High Court observed that it would have to be a real commercial transaction that the defendant had entered into with the website users specifically targeting the jurisdiction of the Forum Court which would result in injury or harm to the plaintiff. Delhi High Court's decision in the case of *Banyan Tree Holding (P) Limited v. A. Murali Krishna Reddy* was distinguished by the Court here while observing that in the instant case, there was an international mark and an international website from which the goods are sold.

Holding that there was no cause of action for filing a suit for infringement in the present case, the Court noted that plaintiff was not able to establish that the use of the website was with an intention to complete or conclude transaction specifically targeting the consumers base where the plaintiff's goods were stored.

[*Iconic IP Interests Llc v. Shiv Textiles* – Judgement dated 9 May 2025 in R/Special Civil Application No. 1543 of 2025, Gujarat High Court]

- 1) **Trademarks – Extension of time under Section 131 when can be sought**
- 2) **Trademarks – No deemed abandonment under Section 45(2) when extension sought within prescribed 2 months**

The Madras High Court has held that Section 131 of the Trademarks Act, 1999 may be invoked to seek an extension of time from the Registrar for doing any act for which time is not fixed by the Parliament in the statute and is instead fixed by the Central Government in the Trademark Rules, either expressly or by conferring the power to do so on the Registrar.

Also, the Court observed that when read with Rule 109 of the Trademarks Rules, this right (of seeking extension) gets curtailed in relation to the doing of any act for which either a maximum time period is prescribed in specific rules or where extension of time is governed by the specific rule(s). According to the Court, the specific rule(s) would prevail over the general prescription in Section 131 read with Rule 109.

Further, the High Court held that the request for extension of time filed within the two-month period prescribed in Rule 45(1) should be construed as an action under sub-rule (1) thereof and hence as a corollary, the legal fiction in sub-rule (2) of Section 45

[relating to deemed abandonment] will not get triggered. The Court also took note of Section 132 which according to the Court provides a remedy on the possibility of abuse by filing a defective application and thus averting deemed abandonment.

[*Kangaro Industries v. V-Guard Industries and Ors.* – Judgement dated 21 August 2025 in (T)CMA(TM) No.193 of 2023, Madras High Court]



# News Nuggets

- Patents – Delhi High Court remands dispute on questions of double patenting, Sections 130 and 3(f)
- Trademark Registrar is expected to decide registration application in a reasonable time
- Trademark – Interlocutory petition before the Trademark office is wrong when without statutory basis
- Trademark 'PETKIND' allowed to proceed for advertisement – Objection of earlier mark 'PETKIND PHARMA' overruled
- Trademark 'Pro.Fitness' allowed to proceed for advertisement
- Trademarks – Delhi HC declines to grant interim injunction against use of WOW!
- HOTELCOM restrained from infringing trademark Hotels.com – Court cites initial interest confusion
- E-infringement – Supreme Court upholds Delhi HC DB's stay order on huge damages

## Patents – Delhi High Court remands dispute on questions of double patenting, Sections 130 and 3(f)

The Delhi High Court has remanded the matter concerning refusal of patent titled 'METHOD ARRANGEMENT AND PELLETISING PLANT', after it observed that the Controller was unable to explain the findings of double patenting in the impugned order, especially in view of the comparison and explanation of the claimed invention in each of the three patent applications, set out by the appellant in its written submissions. The High Court in this regard found merit in the submission of the appellant-applicant that before returning a finding on double patenting the Controller ought to have made an inquiry with regard to sameness of the claimed invention in all the three applications.

While remanding the matter, the Court also noted that no opportunity was given to the appellant and its patent agent to put forth its response *vis-à-vis* regarding the objection under Section 130(1) of the Patents Act, 1970, as the reference to Section 130(1) was first raised in the impugned order and not in the hearing notice. Also, with respect to Section 3(f), the Court in *Luossavaara Kiirunavaara AB v. Assistant Controller of Patents And Designs* [Judgement dated 9 September 2025] observed that the impugned order suffered from lack of reasons to enable the

Court to appreciate the merits of the findings in the impugned order. *The appellant was represented by Lakshmikumaran & Sridharan Attorneys here.*

## Trademark Registrar is expected to decide registration application in a reasonable time

Observing that the Registrar of Trademarks is not expected to keep the applications for registration of trademark pending for an indefinite period and indefinite time, the Rajasthan High Court has stated that the Registrar is expected to decide the application in a reasonable time. The High Court in its decision dated 7 August 2025 in the case of *Nirmala Kabra v. Registrar of Trade Marks* [2025 SCC OnLine Raj 4072] also stated that it expected the Registrar of Trademarks to come up with a strategy to address this issue of backlog of pending applications. According to the Court, excessive delays in resolving the applications seeking registration of trademark undermine the very purpose of filing such applications.

## Trademark – Interlocutory petition before the Trademark office is wrong when without statutory basis

The Madras High Court has suggested the Trademark Office to make it mandatory that the relevant substantive and procedural

provision be indicated whenever an interlocutory application is filed and to further enable the rejection of an application as not being maintainable whenever such application is not founded in the statute. In a dispute involving non-hearing of the petitioner while considering the trademark application before the advertisement is carried in the Trade Marks Journal, the Court noted that the interlocutory petition of the petitioner was without statutory basis. It was noted that the interlocutory application did not make reference to any provision of the statute or the rules in terms of which such petition was lodged. Further, the Court in *Rajkumar Sabu v. Sabu Trade Private Ltd.* [Judgement dated 19 August 2025] observed that an opposition is provided for only at the post advertisement stage.

### Trademark 'PETKIND' allowed to proceed for advertisement – Objection of earlier mark 'PETKIND PHARMA' overruled

The Delhi High Court has allowed the registration of the mark 'PETKIND' in Class 5. The registration was earlier refused by the Trademark Registry under Section 11(1) of the Trade Marks Act, 1999, citing earlier application for the mark 'PETKIND PHARMA' in respect of similar goods and services and under the same Class. The High Court in this regard noted that the appellant in *Mankind Pharma Limited v. Registrar of Trade Marks*

[Judgement dated 22 August 2025] had several Trademark registrations granted in its favour in Class 5 that use the word 'KIND' as a suffix, and hence it had developed a Family of Marks with the word 'KIND' as an essential part of its Trademarks. Allowing the appeal, the Court also noted that the mark 'PETKIND PHARMA' was applied for on a proposed to be used basis and there was no active user of the said mark.

### Trademark 'Pro.Fitness' allowed to proceed for advertisement

Observing that the Trademark Registry's treatment of 'PRO' and 'FITNESS' as separate generic words fails to consider the mark 'Pro.Fitness' in its entirety, which was contrary to the anti-dissection rule, the Delhi High Court has directed the Registry to advertise the mark in the Trademarks Journal. The High Court was of the view that the subject trademark, though composed of familiar words, was presented in a distinctive configuration. The Court in *Mensa Brand Technologies Private Limited v. Registrar of Trademarks* [Judgement dated 22 August 2025] noted that the dot between 'PRO' and 'FITNESS' was not merely punctuation but created a break in meaning and contributed to the overall visual and phonetic uniqueness of the trademark.

## Trademarks – Delhi HC declines to grant interim injunction against use of WOW!

In a case filed by owners of the mark 'WOW!' and 'WOW! MOMO', The Delhi High Court has declined to grant interim injunction against use of 'WOW! Burger'. The Court in this regard noted that 'WOW' is a dictionary word of common use, employed as an exclamatory remark in the English language.

It was held that the plaintiff cannot assert exclusive rights over the expression 'WOW', as it falls squarely within the statutory exceptions [Sections 9(1)(b) and 30(2)(a)] to trademark protection and hence, it cannot be treated as distinctive/dominant mark of the plaintiff. The High Court for this purpose also noted that the Registrar of Trade Marks while granting registration of device mark 'WOW! MOMO', etc., had given a disclaimer against the exclusive use of the words forming part of the composite marks.

The High Court in *Wow Momo Foods Private Limited v. Wow Burger & Anr.* [Judgement dated 12 September 2025] was also of the *prima facie* opinion that it cannot be said that the common law English word 'WOW' had acquired any secondary meaning so as to relate it only to the products and services of the plaintiff, in the mind of the consumer.

## HOTELCOM restrained from infringing trademark Hotels.com – Court cites initial interest confusion

The Delhi High Court has on 26 September 2025 issued an *ex-parte* permanent injunction restraining 'HOTELCOM' from infringing the trademark of global hotel booking service provider Hotels.com. As per *ET LegalWorld* news report, available [here](#), the court reiterated the principle of initial interest confusion which states that confusion in the minds of consumers may arise at the preliminary stage, prior to the actual purchase being completed.

## E-infringement – Supreme Court upholds Delhi HC DB's stay order on huge damages

The Supreme Court has dismissed a plea by Lifestyle Equities, owner of Beverly Hills Polo Club, seeking to enforce huge damages order against an e-commerce entity for alleged trademark infringement. As per news report by *StoryBoard18*, as available [here](#), the Apex Court has upheld the Delhi High Court Division Bench's stay, citing due process lapses and excessive damages beyond the original claim. *The Delhi High Court's Division Bench decision was reported in July 2025 issue of LKS IPR Amicus as available [here](#). The Single Bench decision was reported in March 2025 issue of this newsletter, as available [here](#).*

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exceeding expectations