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# CASE COMMENTARY: SIR RATAN TATA TRUST & ANR V. DR. RAJAT SRIVASTAVA & OTHERS<sup>1</sup>

AUTHORED BY - GORANSHI GUPTA

## INTRODUCTION

The Delhi High Court's ruling in *Sir Ratan Tata Trust & Others v. Dr. Rajat Srivastava & Others*<sup>2</sup> stands as a crucial milestone in Indian intellectual property law, particularly in the protection of well-known personal names and trademarks linked with prominent business personalities. The court ruled that the "Ratan Tata" term, not simply a personal name, is a well-known trademark deserving robust protection from unauthorized commercial use, passing off, and other kinds of misuse.

This commentary analyzes the substantive and procedural aspects of the case, key judicial findings, the evolving protection of personal names in trademark law, and broader implications for intellectual property jurisprudence in India.

## FACTS OF THE CASE

The plaintiffs, **Sir Ratan Tata Trust** and **Tata Sons Pvt. Ltd.**, filed a suit in the Delhi High Court seeking a **permanent injunction** against the defendants, primarily **Dr. Rajat Srivastava** of the **Delhi Today Group**. The defendants were organizing an event "**Ratan Tata National Icon Award 2024**" which was scheduled at Maharashtra Sadan, New Delhi, without any authorization or permission from the plaintiffs.

The defendants used the registered trademarks "**TATA**" and "**TATA TRUSTS**", as well as the name and image of the late industrialist **Sir Ratan Tata**, to promote the event. They charged a **nomination fee of ₹3,000 for Indian participants and \$100 for international participants**, misleading the public to believe the event was endorsed or sponsored by the Tata entities.

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<sup>1</sup> 2025 SCC OnLine Del 633.

<sup>2</sup> Ibid.

The plaintiffs asserted that the defendants illegally used the Tata brand image, which led to trademark infringement, passing off, copyright infringement of the Tata logo, and incorrect use of personality and likeness rights with respect to the name and image of Ratan Tata. The defendants' actions confused the public and financially exploited the goodwill associated with the Tata brand. Despite the defendants receiving legal notices from the plaintiffs, the defendants continued to promote the event, which led the plaintiffs to seek relief from the court. After being informed of the legal proceeding, the defendants cancelled the event and removed any notices or promotional material related to the event on social media. The plaintiffs requested a permanent injunction to enjoin the defendants from any use of the Tata marks, name, image or likeness of Ratan Tata, or any organization or promotion of the event, or any event that falsely suggested affiliation to Tata entities.

## LEGAL ISSUES

The core legal issues before the court were:

1. Whether or not the name 'Ratan Tata' is a "well-known trademark" entitled to protection under the Trade Marks Act, 1999.<sup>3</sup>
2. Whether unauthorized use of the name, image, and associated trademarks by defendants amounted to trademark infringement, passing off, and copyright violation.
3. The scope of protection extended to personal names linked to established business reputation under Indian law.
4. Grant of interim and permanent injunctions against the unauthorized use to safeguard the commercial goodwill and personality rights of the plaintiffs.

## COURT'S REASONING AND JUDGMENT

### Well-known Trademark Recognition

Justice Mini Pushkarna noted that "Ratan Tata" is a name that easily extends beyond the normal ambit of a personal name. Due to its distinctiveness, reputation, and association with the Tata brand and philanthropic legacy, the name qualifies as a well-known trademark under Section 2(1)(zg) of the Trade Marks Act and deserves protection from unauthorized commercial use.<sup>4</sup> The Court highlighted Ratan Tata's contribution to Indian industry and philanthropy, recognized by prestigious civilian honors such as the Padma Bhushan and Padma Vibhushan.

<sup>3</sup> Trade Marks Act 1999 (India) s 2(1)(zg) (definition of "well-known trademark").

<sup>4</sup> See Trade Marks Act 1999, s 2(1)(zg) & s 29 (Infringement).

This fame, distinctiveness, and commercial goodwill attached to the name effectively converted it into a protectable trademark.

### **Infringement, Passing Off, and Deceptive Trade Practices**

The judgment pointedly noted that the defendants' unauthorized use of the name, logo, and image misled the public into believing there was an official association with the Tata entities. The act of charging fees for participation compounded the deceit, exploiting trust and reputation for commercial benefits.<sup>5</sup>

The court held that such conduct constituted clear trademark infringement (Section 29 of the Trade Marks Act) and passing off, damaging the commercial interests and goodwill of the plaintiffs. The unauthorized use of the Tata logo was also a copyright violation.

### **Protection of Personality Rights**

The ruling also widened the scope of personality rights, emphasizing that protection extends not only to famous marks but also to identities and images of public personalities closely tied to established brands. Unauthorized usage of images and names on commercial platforms is impermissible unless consented.

### **Permanent Injunction and Remedies**

Considering the deliberate and mala fide use, the Court granted a permanent injunction restraining the defendants from:

- Using "Ratan Tata" or related personal names.
- Using the trademarks "TATA" and "TATA TRUSTS."
- Displaying or using photographs or logos related to the Tata Group or the late Ratan Tata.

The Court accepted the defendants' undertaking to desist from unauthorized use and decreed the suit in favor of the plaintiffs. The plaintiffs voluntarily dropped claims for damages and costs, focusing primarily on injunctive relief.

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<sup>5</sup> Trade Marks Act 1999, s 29 (Trademark infringement), and passing off principles from Indian case law.

## CRITICAL ANALYSIS

### Expanding Trademark Protection to Personal Names

This judgment extensively develops Indian trademark jurisprudence by affirming that personal names of high repute may attain the status of a well-known trademark. It aligns with international standards where famous names linked to enterprises or public personalities gain trademark-like protection, such as in the US and UK legal systems.

### Intersection of IP and Personality Rights

The ruling reflects the convergence of trademark, copyright, and personality rights—a notable advancement in protecting intangible assets. It recognizes the commercial value embedded in personal identity and intellectual property connected to business legacies. This broadened protection is essential in an age of digital marketing and personal branding.

### Public Interest and Consumer Protection

By preventing deceptive endorsements and award ceremonies falsely linked to reputed names, the Court protected consumer interests and public trust. The judgment sends a stern warning against parasitic exploitation of well-known marks and personalities via fraudulent commercial schemes.

### Limitations and Future Considerations

- The decision emphasized injunctive relief rather than damages, potentially limiting pecuniary deterrents.
- Legislative reforms could clarify protection frameworks for personal names within trademark and personality rights statutes, addressing ambiguities.
- Courts will need to consistently balance free speech rights and commercial protections in such personal name cases.

### Implications for Legal Practice and Policy

- Legal practitioners must approach trademark registration and enforcement strategies considering personal name trademarks for notable personalities.
- Businesses and individuals using personal names commercially should proactively safeguard these through trademark and copyright registration.

- Policymakers may consider amendments to explicitly recognize personality rights as integral to intellectual property regimes.

## CONCLUSION

The Delhi High Court's judgment in *Sir Ratan Tata Trust & Others v. Dr. Rajat Srivastava & Others* is a landmark decision that firmly establishes "Ratan Tata" as a well-known trademark deserving robust protection. The ruling extends trademark rights beyond traditional logos to include personal names that have gained significant goodwill and reputation in the corporate world. It highlights the importance of protecting brand identity from unauthorized use that could mislead consumers or dilute the brand's value.

By emphasizing fairness, consumer protection, and the prevention of commercial deception, the court has provided a strong legal safeguard against misuse of famous names. This decision not only benefits trademark owners but also strengthens India's intellectual property framework, reflecting the evolving relationship between personal identity, brand reputation, and IP rights in modern business.

Overall, the judgment serves as an important precedent for the protection of well-known marks tied to personal names, offering valuable guidance for legal, corporate, and policy stakeholders in India.

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