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YOUTUBE'S BIGGEST CONTENT A HOAX? - PROBING INTO THE GREY AREAS OF STREAMING W.R.T. FREE SPEECH & THE NEED FOR SPECIALISED COURTS

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Abstract

In the contemporary times, with the intangible creations of the human intellect taking upsurge, it is pertinent that the same be rightly protected. A set of legislation in countries around the world are centered to deal with their protection. Thus, without any manifested or palpable arbitrariness, the Intellectual Property Rights take over a germane role in the legal world. This essay, in an attempt to shed light on one of the most coveted issues involving copyright, pertains to three broad aspects. Firstly, it lays a premise while delving into the nitty-gritties of copyright issues pertaining to live streaming and broadcasting in India. The concept emerged in India with cricket and hence, is not a novel development in the Intellectual Property regime. However, with the evolution of society and widening of the scope of its utilities, the issue graves. Though India in its recent ranking has witnessed a slight surge in its overall IP score from 38.4 to 38.6, the country is still ranked 43 out of 55 on the Intellectual Property Index. Which brings us to the contemplation of stringency of the set legislature and the second contention of this essay. The protection of fundamental rights, including the ones of free speech and expression, in a commensurate fashion, depend on the existing laws. Finally, when we speak of the legislations and the public welfare, it is all rendered moot if there lacks a redressal mechanism to which the paper deals with, whilst touching upon the country's stance on lack of specialized IP courts. The author(s) in the essay have taken up the same in an elaborate manner while keeping abreast of Indian and International laws.

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Premise

The essence of copyright laws is to ignite originality and creativity in works of literature, art or dramatics, etc. It promotes the creation of something 'new' and protects the minds who achieved this feat. At the same time, it functions to allow reasonable use of existing works to develop new literature and art. When we speak of copyright, the attenuation of 'original' and the concept of originality is to be taken cognizance of. Now where the Copyright Act stems its roots from goes way before independence, when India adopted the extension of England's Copyright Act,[3] which did not do much good, to which the Indian legislature sought solution by passing the act of 1914.[4] The impugned act stayed for a while, until it was repealed and replaced with the incumbent act of 1957.[5] The act called for certain amendments owing to advanced means of communications, including broadcasting and lithography, to which subsequent amendments laid provisions for fulfilment of international obligations.

Revisiting the concept of originality, it varies in different countries, evolving with precedents and the growth of technology. To decide whether a photograph of Oscar Wilde was original or not, the US court noted the creative choices made by the photographer, including pose, costume, lighting, accessories, and the set itself.[6] Its basis for creativity is that the work should add to the pool already available to the public, asking for minimal creativity or what we now call the doctrine of *'modicum of creativity.'*[7] The UK's court of law differs from this interpretation at a fundamental level. For the Brits, originality is referred to as the 'author's own intellectual creation' following the *'sweat of the brow'* doctrine.[8] The court in its precedence, insisted on the need for original artistic skill and labour.[9] Here, calling originality a synonym for creativity will not be a stretch. The sweat of the brow is a much stricter doctrine than its western counterpart lying on different sides of the originality spectrum.

[3] Copyright Act 1911.
[4] Copyright Act 1914.
[5] Copyright Act 1957.
[6] *Burrow Giles Lithographic Co v Sarony*, 111 US 53,60 (1884).
[7] *Feist Publications Inc v Rural telephonic Service Co*, 499 US 340 (1991).
[8] *Walter v Lane*, [1900] AC 539.
[9] *Newspaper Licensing Agency Ltd v Marks & Spencer, plc*, [2001] UKHL 38.

As you may have guessed, India lies in the middle, following the sweat of the brow with a hint of the modicum of creativity.[10] A work does not infringe the copyright of an existing one when it follows a certain standard of originality and creativity itself. To cope with emerging technologies and preserve the rights of creators, a new test has been developed, providing a way to measure creativity by the quality and quantity of creative choices.[11] The key question remains what creativity is? Steering our conversation to technology and, in particular, the emerging kind of content creation on social media, a trend of 'reviewing' stuff like movies, choreography, memes, etc.

Under the exceptions to copyright,[12] the defense of fair use is usually taken by users of copyrighted work, permitting them to use it for criticism, comment, news reporting, teaching or research, etc. It includes all kinds of work. The S.52(1)(a) of the act[13] stipulates that a *'fair dealing'* of any work, not being a computer program, for private use, including research, criticism or review or reporting of current affairs and news events, is excluded from infringements to copyright. While the others have been well-researched and talked about, the review part of the exception remains ambiguous.

The debate can be dumbed down to '*constructive review versus review*'. Keeping the spirit of the copyright act in mind, it promotes constructive review of the material, adding some material novelty to it. It raises questions about whether Tanmay Bhat 'reacting' to certain memes on the internet will come under this exception. We may note that reaction videos like this often include commentary on the original work, either recording the creator's genuine reaction, which may be content for some people, or their satirical remarks. Hence, the ambit of review is subjective on a case-to-case basis, involving different facets like the likelihood of affecting competition, monetization, popularity, etc. This ambiguity in law also makes it prone to misuse by the parties involved. After noting the arguments on originality, creativity, and the like, let us move to specific circumstances that are coming up as legal grey areas and will soon move to the courts. Until then, the decision to decide the copyright's validity or its infringement rests with private players.

[10] *Eastern Book Company v DB Modak*, 2002 PTC 641.
[11] Daniel J Gervais, 'Feist Goes Global: A Comparative Analysis of the Notion of Originality in Copyright Law' (2002) 49 J Copyright Soc'y USA 949.
[12] Indian Copyright Act 1957, § 52.
[13] Indian Copyright Act 1957, §52(1)(a).

Live streaming and escapism from traditional Copyright laws

The phenomenon of 'watching other people play games', is now the big boom for social media, accounting for over 100 billion hours of YouTube content in 2020 alone.[14] Whether streaming the entire game to the public who did not pay for it or downloaded it, if it's free, comes under copyright infringement or not is an issue no one wants to discuss. India, notably, does not have gaming laws and is dealt with by practices in the gaming industry. There appears to be an informal contract between developers and streamers. Computer games are coded and are considered literary work under section 2(o) of the copyright act 1957.[15] Literary work is protected under the act under section 14 (1) (a)[16] concerning 14 (1) (b)[17] of the copyright act.

As per the Indian Copyright Act, 1957, Section 2 (o), you can protect your software coding and programming from reproducing, copying, translating, or adapting to save from copyright infringement software. However, games can't be considered a set of codes. Delving into the technicalities, it must be noted that games are considered 'complex subject matter' and a stand-alone object of protection,[18] which means that a game as a whole cannot be taken up as a subject matter, but, is divided into many elements which form them including but not limited to the characters, gameplay, sounds, dialogues and music, the artwork and visual design, game codes and player license.[19] This also invites different types of copyrightable subject matters. In one of the most well-researched papers in this area, *'Can You Play,'*[20] Amy Thomas differentiated such matters into video (ex-cut scenes), graphic works, audio, literary works, and merchandise, among others. For the purpose of this essay, we shall stick to the streaming of gameplay in context of the IP rights. In layperson's terms, streaming gameplay means uploading how you interact or play a particular game to sites like YouTube, Twitch etc., for enjoyment or monetization purposes, be it pre-recorded or live.

[14] LeBlanc W, '200 Billion Hours Were Spent Watching Gaming Content on YouTube in 2020' (*IGN*, 31 December 2020) https://www.ign.com/articles/100-billion-hours-were-spentwatching-gaming-content-on-youtube-in-2020 accessed 29 November 2022.
[15] Indian Copyright Act 1957, § 2(o).
[16] Indian Copyright Act 1957, § 14(1)(a).
[17] Indian Copyright Act 1957, §14(1)(b).
[18] *Nintendo Co Ltd v PC Box SRL* [2014] OJ C93/8.
[19] Reetika Wadhwa and Meril Mathew Joy, 'Copyright in the gaming industry' (*Mondaq*, 3 January 2020) https://www.mondaq.com/india/copyright/879888/copyright-in-the-gaming-industry accessed 11 November 2022.
[20] Amy Thomas, 'Can You Play? An analysis of video game user-generated content policies' (*CREATe*, 24 May 2022) https://www.create.ac.uk/blog/2022/05/24/new-working-paper-can-you-play-an-analysis-of-video-game-user-generated-content-policies/ accessed 18 November 2022.

Heading back to the contention in question, streaming provides revenue and followers to the streamers and popularity and sales for the game developers. It seems like a win-win situation, but it's not, per the public performance. It is seen as a general trend that gaming companies proceed with copyright strikes on newer channels who are trying to take support of the game to earn followers. YouTube or the respective streaming service removes these videos without reaching the court of law. On the other hand, there have been times when the views on a stream have not translated into sales for the developers, motivating them to take adverse action. From this, it may seem like streaming is a clear-cut violation of copyright, except it's not (again). Creators who stream games often comment on it while playing. For example, top creators like PewDiePie or CarryMinati, have built their careers on this. The creators have a commentary on the side, adding a personal touch or, legally speaking, novelty and originality to work. This again brings us to the fair use defense. This exception can be applied to video game streaming because it includes comments by the audience and continuous reviews on the game by the streamer. This puts them outside the purview of the copyright act, but this outcome is also not necessary as it depends on how the judge views it (the test of quantity and quality).

Exploring another facet of the commentary, what if the creator makes a controversial or morally wrong statement while playing the game (and streaming it)? This may associate the brand with that negative statement. A similar controversy occurred when PewDiePie made a racial slur while streaming.[21] The gaming company took down his video with a copyright strike on YouTube without caring how big of a creator he was. The Canadian Copyright Act[22] has an interesting provision for the same. Moral rights under Copyright Law protect the author's association with the creative work by preserving the integrity of the work and the intent behind the work. Morality, however, is subject to the freedom of speech and expression. This will be dealt with at a later stage in the essay. On the balance, it must be noted that not all streams are equal. The value of streams expressed without owner authorization outweighs the loss of revenue, howsoever little it might be, what is needed, is 'striking a balance.'

[21] Owen S Good, 'Firewatch creator vows DMCA retaliation against PewDiePie for racist slur used in stream' (*Polygon*, 10 September 2017) https://www.polygon.com/2017/9/10/16285188/pewdie-pie-racist-slur-firewatch-retaliation-dmca accessed 16 November 2022.

[22] Canadian Copyright Act 1924.

Among these emerging problems and copyright abuses, there are also solutions. Companies, including Sony and Microsoft, encourage gamers to stream and share their gameplay online.[23] Developers like Devolver Digital have websites that answer the question, 'Can I Stream and monetize'[24]. It is a simple and big 'Yes.' from their side. The site also helps players generate written permission by submitting their channel names. Some developers prefer levying a viewing fee on the stream by the gamers. Even big media houses like Nintendo are also starting to lean in favour of gamers (and yes, one favour herein, does not beget another favour). Now, these are not rock-solid agreements and just commitments by the brands. They do, though, form a good building block. The need for uniform copyright gaming laws persists as these commitments can't be taken as a substitute for them. The laws must balance the owner's rights and the career of innumerable streamers. This doesn't end here, settling this contention invites a major concern, how stringent should the laws be, what provisions should they be guided by and up to what extent could they interfere with our rights, which has all been taken up in the furthering sections of the essay.

Saving free speech from stringent legislation?

History dictates, when a right is conferred by the Constitution, especially a Fundamental right, the object that is sought to be achieved from the same is to be analyzed. The jurisprudential justification of these rights is *sine qua non*. In the social contract entered upon by the citizens, the freedom to express oneself owes four-fold social purposes to serve. The first prong of which helps an individual to attain self fulfilment, the second assists in the discovery of the truth, the third strengthens the capacity of an individual in participating in decision making and finally, the fourth provides a mechanism by which it would be possible to establish a balance between social change and stability, whilst facilitating artistic and scholarly endeavor of all sorts.[25] In an expansive view, all members of a society shall be bestowed with the power to formulate their views, beliefs and subsequently communicate the same. Provisions, be it the first amendment to the Constitution of the US,[26](upholding freedom of expression in cases of certain music[27], flag burning,[28] or non-

[23] Himanshu Sinha, 'Video game streaming and copyright law' (*Khurana and Khurana*, 30 September 2021) https://www.khuranaandkhurana.com/2021/09/30/video-game-streaming-and-copyright-law/ accessed 25 November 2022.

[24] 'Can I stream and monetize Devolver Digital game?' (*Devolver Digital Inc,* 2022) https://canipostandmonetizevideosofdevolvergames.com/ accessed 1 December 2022.

[25] David Feldman, 'Civil Liberties and Human Rights in England and Wales' (1993) Clarendon Press, Oxford P 547-548.

[26] Constitution of the United States 1789, First Amendment.

[27] Ward v Rock against Racism, 491 US 781, 790 (1989).

[28] Texas v Johnson, 491 US 397 (1989).

obscene pornography)[29] or its borrowed version in article 19[30] of the Indian Constitution, ushered changes and amendments in the outlook of this liberty to express views, likewise in ICCPR[31] and UDHR.[32] All this sums up to the indication, *"Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media regardless of frontiers."*[33]

The end goal of a man is the realization of his potentialities as a human being and for achievement of this self-realization, the mind must be set free. While delving into the contentions of the Intellectual property rights, it is imperative that one note the *'law of copyright'* is nothing but an extension of the freedom of speech and expression, which implicates towards the fact that naturally intellectual work shall be protected as a property and deprivation of property, shall a) not be done, or b) be done only according to the law.[34] Amidst the technological revolutions, innovations steeped in through intellectual accomplishments demand protection against misuse. As a testament to the commercial value, the intellectual property rights are undisputedly an outcome of the intellectual labor.

The march of civilization is the march of reason and communication of such reason from an individual to the community or to the world at large.[35] Dating back to when man was a simple hunter, all by himself, there was no need for communication. As and when he became more of a 'social creature', the pattern of the society varied and what conveyed in communication became symbolic of group living. With the development of the democratic society, the right to freedom of speech and expression turned to a pertinent political right and the intellectual property rights in furtherance turned to protecting some finer manifestations of human achievement. Cut short to the present, after deliberations and conventions, the comity of nations ended up acknowledging Intellectual property as tangible and thus be made corpus of proprietary right for the original creator, however, a set of limited forms of protection is accorded against certain kinds of exploitation by others. Continuing with the pace set in the essay, with regards to livestreaming of gameplays, online reviews and/or walkthroughs, the idea of striking the same on account of copyright claims is subject to a necessitated review of the content. The objective then boils down to achieve a balanced approach alongside a justifiable reason. The purpose of copyright laws then

[29] Miller v California, 413 US 15,24 (1973).
[30] Constitution of India 1950, Art 19.
[31] International Covenant on Civil and Political Rights 1966, Art 19.
[32] Universal Declaration of Human Rights 1948, Art 19.
[33] Dr Sreenivasulu NS, 'Human Rights, Many sides to a coin', (2008) P 182.
[34] Constitution of India 1950, Art 300-A.
[35] Herold J Laski, 'A Grammar of Politics George Allen & Unwin Ltd, London', (1970) P 95.

serves to be a) incentivize innovation and not just maximizing revenue, b) streaming gameplays, walkthroughs or even reels act as a highly interactive media providing entertainment, inspiring viewer engagement and innovation. No doubt, the earnings of the popular streamers will inadvertently (or intentionally) tempt the game developers to exercise their rights aggressively and not in public interest, or their interest as a matter of fact. Shielding such streaming is pertinent, but the extent to which the same shall be pursued is the question.

Tipping the scale with the definitional balance, copyright law and the incentive it provides to creativity, contrary to the popular notion, the law does not stand as an obstacle to pursuance of free speech as to publish to perish, rather, enhances the value of such speech and expression owing to a two-pronged analysis. The first limb concerns the rights or the proprietor or owner to use the property as he wishes, howsoever, as an extension to the same, the second limb unveils the moral basis of protection of copyright afforded against plagiarism, in words of the eighth commandment of Mosaic Law, *"Thou shall not steal.*[36]*"* As an undisputed contention and an amalgamation of the Copyright laws and the freedom of speech and expression, the man enters with his own way of living, satiating the view wherein privacy is a man's copyright in his own self.[37] The imitation of a particular life would hence be an emulation, and none can publish anything concerning the above matters (private), without his consent or otherwise-lest it be truthful, laudatory or critical. Any such publication shall not be protected under 19(1)(a).[38]

The traditional contours and the previous amendments[39] exacerbated coherence and had sparked deliberations on its compatibility whilst upholding the spirit of the constitution. As an opposition to the proposed amendments, it has been contended that the right to equality, by failing to institute a meaningful exception, ends up infringed. At times, it might point towards an anomaly that the proprietorship of the law and the freedom cannot go together, but it is made very clear a copyright be given to the originator for its explicit form. It is appreciative of the fact that though copyright is an extension to freedom of expression, it simultaneously acts as an incentive to innovators and authors of original ideas, and defends different forms of expression. All this sums up to, is there really a need to 'save' free speech or are the legislations actually 'stringent'? Since it has been

[36] Adesh Kumar, '*Protection of Copyright with special reference to film and music industry'*, 'IJR' 2008 (2) P, Art. 25.
[37] Shivani Kundle, '*Moral Rights and the conflict with freedom of expression'* (*Mondaq*, 23 December 2020) https://www.mondaq.com/india/copyright/1019084/moral-rights-and-the-conflict-with-freedom-of-expression accessed 12 November 2022.
[38] *R Rajagopal v State of Tamil Nadu*, AIR 1995 SC 264.
[39] Hemantha Kumar and Sreenivasulu NS, 'Nuts and Bolts of Copyright amendment Bill' (2010) Manupatra Intellectual Property Report.

made clear by the legislation that a copyright is given to the originator in its explicit form, i.e., a composition, and not just an 'idea' of the composition. Though this doesn't reduce the worth of an idea,[40] it establishes a dichotomy of expressions, thereby allowing the laws to be not as 'stringent' as they might seem and lend a grey area for a balanced approach. To that, a Marcony, a Grahambell, Edison, and many others have been protected, not only the interest of the author, but encouraging similar contributions in the vast field of literature, science, arts, designs and in all spheres.

The paradoxical solution of specialized IP Courts

Whilst delving into the nitty-gritties of the Intellectual property rights and the basics of its legal infirmities, what is of pertinent concern is the judicial backing it holds? In an attempt to trace its path, it backs to 2003, when a tangible action, the strangest beast, in form of Intellectual Property Appellate Board (IPAB)[41] was constituted by the Central government to hear appeals against the decisions of the Registrar under Trademark act,[42] the Geographical indications of goods provision,[43] and was further extended to the horizons of Patents[44] and Copyright[45] in 2017. The IPAB with its vision to bring the best expertise in the Intellectual Property regime was tasked with two key functions, a) to decide appeals from Indian Patent and Trademark Office, and b) to determine the validity or otherwise of granted patents and trademarks. Though IPAB was an attempt similar to building of specialized courts as the Patents County Court in the United Kingdom or the Court of Appeals for the Federal Circuit in the United States, however owing to its fairly limited jurisdictional role, IPAB couldn't stand the test of time, and ultimately succumbed to various difficulties on account of lack of technical expertise leading to pendency and delay of matters. 2021 did usher stringent ordinance in tribunal reforms[46] with immediate effect, yet the question as to, is there an appropriate judicial backing to bring the matters to their disposal, still stands. Despite the best intentions (albeit the same is not an undisputed fact), IPAB's constitutional competence was challenged on account of primarily not sufficiently being independent of the government, secondly, the qualifications for appointment of judicial members of the board being contrary to the law of land and finally, the fact that irregular appointments were

[40] *RG Anand v Deluxe films*, AIR 1978 SC 1613.
[41] Prashant Reddy, 'De-Coding Indian Intellectual Property Law-The end of the IPAB and lessons on concentration of judicial powers' (*SpicyIP*, 1 September 2021) https://spicyip.com/2021/09/the-end-of-the-ipab-and-lessons-on-concentration-of-judicial-powers.html accessed 12 November 2022.
[42] Trade Mark Act 1999.
[43] Geographical Indications of Goods Act (Registration and Protection) 1999.
[44] Patents Act 1970.
[45] Copyright Act 1957.
[46] Tribunals Reforms (Rationalisation and Conditions of Service) Ordinance, 2 of 2021.

the norm, rather than exception.

In an attempt to cover our contention regarding copyright laws in general and in digital platforms, it is pertinent that the issue of lack of specialized IP courts be taken up too. It is time and again contended that the nation did have a failed tribunal system, one of the pearls in the garland of reasoning is that of the tribunals lacking independence.[47] To amplify this dependence, the reticent government failed to make corrective attempts with respect to the IPAB and its composition. What the contention majorly was, that, albeit the tribunals took over erstwhile functions of the High Court, it lacked the judicial gravitas particularly in terms of the abilities and the eligibilities of the adjudicator and its independence from the Executive. *"If a Tribunal is packed with members who are drawn from the civil services and who continue to be employees of different Ministries or Government Departments by maintaining lien over their respective posts, it would amount to transferring judicial functions to the executive which would go against the doctrine of separation of power and independence of judiciary."*[48] Continuing measuring the merits of IPAB, the reasons touted for its creation, owing to the preposterous pendency rates at High Courts and the urgency of IP disputes hoping the disposal at 'specialized forum' per se, failed to justify its standing, which brings us back to the lack of specialized forums for IP laws leading to a pending resolution of judicial dilemmas. All this boils down to the fact that the country did attempt to bring in specialized courts for redressal, however the idea due to its flawed implementation was nothing but a failure, but does it lead us to a total no-go on the same, is the question this section of the essay deals with.

If we attempt to objectively negate the idea accepting specialized IP courts, considering developed nations in a far-cry for an affirmative action, the US Supreme Court while declaring the Bankruptcy Act unconstitutional, emphasized on judicial independence guaranteed to the general courts yet the specialized courts were bereft of[49]. Dealing with the nature of IP, it is but an instrument of public policy, a *right in rem* and not *in personam*, in furtherance of which, the specialized courts' judges are less likely to have independent judicial authority and on the contrary are more likely to be subject to their appointing authority, thus creating evident bias. All this is neither necessary nor proportionate, as we need to recall that in addition to these factors, the

[47] Justice (Retd) Prabha Sridevan, 'Mainstreaming Public Health Considerations in Adjudication of Intellectual Property Disputes: Implications of Specialized IP Courts and General Courts' (*South Centre*, 31 January 2022) https://www.southcentre.int/wp-content/uploads/2022/01/SouthViews-Judge-Sridevan.pdf accessed 3 December 2022.

[48] *Union of India v R Gandhi*, 2010 (5) SCALE 514.

[49] Northern Pipeline Construction Co v Marathon Pipeline Co (1982).

patent economies distort the litigation costs, and hence fall inept to safeguard public interests at the end of the day. It is theoretically applauded that the specialized IP courts may improve the quality of justice to IP rights holders, but in a pragmatic scenario, it is not a *one-size-fits-all* situation, when we speak of a country like India, the costs beyond doubt outweigh the benefits. The idea of having specialized courts is rendered moot if the country can't afford the same. In an attempt to localize the views in this essay, it all boils down to the quality of justice and whether or not having specialized courts stand as a viable alternative, let alone being the only alternative. Without a hint of humility, it can be opined that specialized IP courts at the moment might serve as nothing but a drain in the exchequers which developing countries, such as ours might not be able to afford. Someday, in the distant future, it might be a viable option to peruse but now, sadly, is not the time.

Concluding contemplations

It is no secret that every passing minute calls for an amendment in the Intellectual Property laws. In the contemporary time data is the new currency. With all technological advancements, we're left at a juncture where absence of proposition, let alone implementation of specialized laws will leave us in a huge mess. Drawing instances from the gaming industry itself, the process of companies reporting copyright violations on creators' videos and YouTube taking them down has become a routine, yet no creator turns to the court for its resolution. However, the bubble is about to burst. This is an impending issue for courts around the world and the online content creation industry can't be underestimated. As stated earlier, they form a huge part of how big companies like YouTube and Twitch generate profit. Influencers truly have the power to 'influence' their audiences. Creators too are representing the country on a global stage at various platforms. Ultimately, the power these industries hold is huge and so is the need to formulate uniform laws.

Now what is further needed, is to strike a balance between the parties. The fundamental rights of the people involved, their right to freedom of speech and expression, need to be given primacy and kept in mind while formulating legislation. Things like 'fair use' and 'morality' which are highly subjective need to be objectivized through a standard test of originality. This automatically generates the need for the judiciary to formulate specialized Intellectual Property courts and appoint judges who are adept with the technicalities and sensitivities of these issues. This again, needs to be done without bias so that the decision does not inherently favour a party, keeping public interest supreme.

This is the best time to frame such laws and establish bodies. We need to learn from the cases arising in Western countries who are starting to face similar issues due to lack of dispute resolution mechanisms. India stands at the booming phase of the imminent technological revolution, which was given a push by the Covid pandemic and lockdowns caused henceforth, forcing people to seek entertainment online. India can set a precedent for not only developing, but also developed countries who are still to stipulate such legislations. The trajectory of online entertainment and development is set on big advances like the Metaverse and 'thought-provoking' legislations await.

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