

IN THE COURT OF THE CITY CIVIL JUDGE AT  
BENGALURU

O. S. No. 42 / 2022

**BETWEEN:**

Srinivas S. Devathi

...Plaintiff

**AND:**

Legal and Treaties Division, Ministry of External Affairs

...Defendant

**MEMORANDUM FOR PRODUCTION OF ADDITIONAL  
DOCUMENTS**

I, Srinivas S. Devathi, an Indian citizen submit the following additional documents to the Honorable court, providing details on 'Cause of action'.

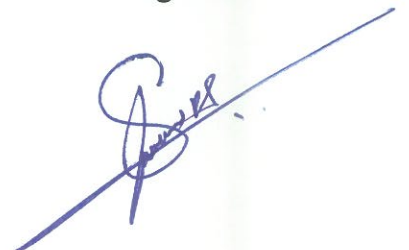
**Document 2)** An e-mail communication to the defendant dated 20-9-2021. **2 Pages.**

**Document 3)** The 'Read-receipt' e-mail delivered to me, for the e-mail communication I sent to the defendant. I have consistently received 'Read-receipts' from Mrs. Uma Sekhar on most of my e-mail communications. **1 Page**

**Document 4)** Photocopy of all the documents attached with OS 2487 of 2021 at the time of filing the suit. The suit was filed on 9-4-2021. It was filed with 29 documents attached. **424 Pages**

**Document 5)** Photocopy of documents 30, and 31 submitted to the court for OS 2487 of 2021, on date 3-7-2021 along with the accompanying Verifying Affidavit. **37 Pages**

**Document 6)** Photocopy of documents 32, 33, 34, and 35 submitted to the court for OS 2487 of 2021, on date 22-7-2021 along with the accompanying Verifying Affidavit. **97 Pages**



**Document 7)** Photocopy of documents 36, 37, and 38 submitted to the court for OS 2487 of 2021, on date 1-10-2021 along with the accompanying Verifying Affidavit. **48 Pages**

**Document 8)** Photocopy of document 1A submitted to the court for OS 2487 of 2021, on date 17-1-2022 along with the accompanying Verifying Affidavit. **4 Pages**

**CAUSE OF ACTION:**

Here is high level summary chronological sequence of events giving the cause of action to file lawsuit OS 2487 of 2021 and thus OS 42 of 2022.

**27-3-2014:** I file the 'Priority patent application' for my invention 'Systems and methods for altering the color, appearance, or feel of a vehicle surface'. Receiving office is USPTO in the capacity of national PTO of USA. This was given an application number 14/227,859.

**15-7-2014:** By taking priority of patent application 14/227,859; I filed a PCT, Patent Cooperation Treaty international application. The receiving office is USPTO in the capacity of 'International Search Authority'. This international application was given an application number PCT/US2014/046619. Both the applications content is exactly the same. They are identical.

**16-12-2014:** The priority application 14/227,859 was issued as a patent grant with patent number US 8,910,998 B1.

**5-8-2015:** The PCT International application PCT/US2014/046619, was issued a fabricated 'International search report – ISR', with a fabricated date, with fabricated prior art of Cobb, Price, Saenger, and Hale, which never existed before this date. This fabricated ISR issued by USPTO in the capacity of International search authority, is the cause of action for OS 2487 of 2021 and this suit. USPTO breached articles 18 and 19 of Patent Cooperation Treaty.

The cause of action to this suit arose on 5-8-2015, when USPTO fabricated prior art and issued a fabricated ISR with a fabricated date. The detailed 'Chronological sequence of events' are available in pages 8-13 of the attached document 1 with this lawsuit, the certified true copy of OS 2487 of 2021. On





the date 5-8-2015, two articles of Patent Cooperation Treaty were breached by USPTO. The Patent Cooperation Treaty is attached as document 26 of OS 2487 of 2021 (within the attached document 4). These are Articles 18 and 19 of Patent Cooperation Treaty.

Article 18 of Patent Cooperation Treaty, titled 'The International Search Report' clause (2) reads 'The international search report shall, as soon as it has been established, be transmitted by the International Searching Authority to the applicant and the international bureau.'

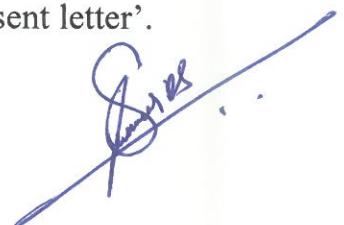
Article 19 of Patent Cooperation Treaty, titled 'Amendment of the Claims before the International Bureau' clause (1) reads 'The applicant shall, after having received the international search report, be entitled to one opportunity to amend the claims of the international application by filing amendments with the international bureau within the prescribed time limit. ....'.

Both these articles have been breached by USPTO, as I neither received the ISR as soon as it was established, nor was given the one opportunity to amend claims with International bureau that I was entitled to.

**April 2019:** Due to USPTO issuing fabricated ISR with fabricated date, and their breach of Patent Cooperation Treaty, it resulted in the loss of 'Intellectual property rights' to my invention patent US 8,910,998 B1 across most of the 62 countries I had sought for invention rights protection. The full liability has been caused. The full liability must be paid by USPTO. **62 sale agreements listed in document 28 and detailed in document 29 (within the attached document 4) must be executed through this Honorable court.**

**9-4-2021:** OS 2487 of 2021 filed in CCH-10, Bangalore city civil court. Over multiple hearing dates, I present the entire suit, chronological sequence of events of OS 2487 of 2021 to this court and prove USPTO fraud beyond any reasonable doubt to the court.

**3-7-2021:** This Honorable court makes notation in the order sheet clearly indicating that the only 'Legal requirement' to get OS 2487 of 2021 initiated is the 'Consent letter of Indian government duly signed, certified in writing by a secretary of Indian government. The court has captured the fraud of USPTO beyond any reasonable doubt and states that the only argument on maintainability of OS 2487 of 2021 is the required 'Consent letter'.



**USPTO fraud has been documented and proven beyond any reasonable doubt in OS 2487 of 2021.**

This suit OS 42 of 2022 is for the defendant to directly present the 'Consent letter of Indian central government, certified in writing by a Secretary to Indian government' to this Honorable court.

**JURISDICTION out of my citizenship and permanent residential address:**

I am an Indian citizen. Document 1A of OS 2487 of 2021 (within the attached document 8) are photocopies of my most recent passport, duly notarized, legally confirming my Indian citizenship, photo identification, and my current residential address. Document 25 of OS 2487 of 2021 (within the attached document 4) lists IN – India, as one of the PCT contracting states. Document 8 of OS 2487 of 2021 (within the attached document 4) lists all the regional and national stage applications that I filed using my PCT international patent application PCT/US2014/046619, which also includes India national stage application # 6623/CHE/2014 filed on 26-12-2014. Document 8 of OS 2487 of 2021 (within the attached document 4) lists all the designated states chosen at the time of filing PCT international application, which includes all the PCT contracting states. Thus, jurisdiction to remediate USPTO fraud filed as OS 2487 of 2021 lies here in Bangalore city civil court. To initiate the court proceeding of OS 2487 of 2021, this suit OS 42 of 2022 also has jurisdiction here in Bangalore city civil court.

**CPC provisions for OS 2487 of 2021:**

CPC Section 20(a) provides '*the defendant, or each of the defendants where there are more than one, at the time of the commencement of the suit, actually and voluntarily resides, or carries on business, or personally works for gain, or*'; has provision to bring all four defendants listed in document 1, certified true copy of OS 2487 of 2021 into the Bangalore city civil court, since I have procured their services and did business with all four of them by paying necessary fees to procure their services. My remittances to all four defendants of OS 2487 of 2021, is submitted as document 30 of OS 2487 of 2021 (within the attached document 5).





**Chronological sequence of events for OS 42 of 2022:**

**May 2021 onwards:** E-mail communications to defendant L&T division of MEA informing them about the filing of OS 2487 of 2021 and the ongoing court hearing dates.

**15-9-2021:** I courier via India post, two packages of information to the attention of the defendant. One communication was requesting for the issue of the 'Consent letter' to initiate court proceeding of OS 2487 of 2021, to summon D1-USPTO for their fraud, and summon D3-WIPO and D4-IPI for discovery, and fact verification for the Honorable court. The second communication included the Bangalore press club release, and other documents introducing the preparatory activities to take OS 2487 of 2021 to conclusion by working on getting the 62 sale agreements executed through the court. These communications cover letters are attached as document 36 of OS 2487 of 2021 (within the attached document 7).

**20-9-2021:** I send an e-mail to the defendant, the attached document 2. Mrs. Uma Sekhar received the couriered packages and has had a chance to review the entire lawsuit OS 2487 of 2021 and all its documents. She is fully aware of the USPTO fraud and breach of Patent Cooperation Treaty.

**20-9-2021:** I receive a 'Read receipt' acknowledgement from the defendant to my sent e-mail communication on 20-9-2021. This is the attached document 3.

**22-9-2021:** I had a few minutes telephonic conversation with Mrs. Uma Sekhar in which she verbally confirmed to me that the 'Consent letter of the Indian government' will be given to me to get the proceeding of OS 2487 of 2021 initiated. She requested that I keep the two other divisions AMS division and Protocol division informed about the lawsuit. I did so. I informed these two divisions also.

**27-1-2022:** It has now been over four months since the verbal communication from Mrs. Uma Sekhar. Hence, I would like to summon them to court under the CPC section 86(6) provisions so that they directly submit the 'Consent letter' to the court. If they have any more questions or want to hear the suit OS 2487 of 2021, I shall walk through the entire suit, proving the fraud of USPTO beyond any reasonable doubt directly to them in this court, thus ensuring they issue the necessary 'Consent letter'.



**CAUSE OF ACTION:**

Urgency in initiating the proceeding of OS 2487 of 2021. And the fact that it has been over four months since the verbal communication with Mrs. Uma Sekhar, additional secretary of Legal & Treaties division, within Ministry of External Affairs.

**CPC provisions for OS 42 of 2022:**

CPC section 86 (6) states '*where a request is made to the central government for the grant of any consent referred to in any sub-section (1), the central government shall, before refusing to accede to the request in whole or in part, give to the person making the request a reasonable opportunity of being heard*'. As explained in the 'chronological sequence of events applicable for OS 42 of 2022', defendant Legal and Treaties division will issue the consent letter. Given that it has been over four months since the verbal communication, I would like to summon them to the court so that they hand over the 'Consent letter' directly to the court. At the same time, if the defendant wants to hear more about the lawsuit OS 2487 of 2021, for which they are providing the 'Consent for', I shall review the details in this very court, according to the provisions of CPC section 86(6).

Proactively, I am submitting all the documents attached with OS 2487 of 2021, including documents submitted on later dates, ensuring the entire suit is made available to the defendant when I send the defendant copy upon the courts orders to issue summons. I REPEAT THAT THE FRAUD OF USPTO HAS BEEN DOCUMENTED BEYOND ANY REASONABLE DOUBT IN OS 2487 OF 2021 WITH ALL THE DOCUMENTS ATTACHED.

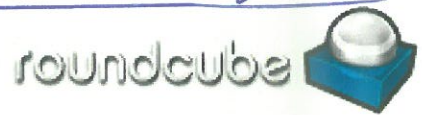
Bengaluru

Date: 27/1/2022

**Srinivas S. Devathi**  
(Plaintiff / Party in Person)



Subject **Fwd: Re: CPC Section 86 clause 6 gives me the reasonable opportunity of being heard since the court is waiting on governments permission to sue USPTO**



From <srinivas@coolcartechnology.com>  
To <aslegal@mea.gov.in>  
Cc <eam@mea.gov.in>, <secywest@mea.gov.in>  
Date 2021-09-20 18:00  
Priority Highest

- OS 2487 of 2021 Certified True Copy Court Order Sheet\_14092021.pdf (~156 KB)

To,  
Mrs. Uma Sekhar, Additional Secretary L&T Division, MEA India

My domain was up for renewal and there has been some e-mail receipt and delivery problems over the last week. Could you confirm the receipt of this e-mail communication that was sent on 14-9-2021?

I have also sent two India post packages that were delivered to your office today. Articles No. EK016734287IN and No. EK016734295IN. These packages have all the vital information pertaining to my lawsuit and its resolution. I await your response to get the lawsuit proceeding initiated.

Srinivas S. Devathi  
Inventor and Author  
Srinivasdevathi.com, Projectearthling.com, Earthlingcurrency.com, Coolcartechnology.com

----- Original Message -----

**Subject:**Re: CPC Section 86 clause 6 gives me the reasonable opportunity of being heard since the court is waiting on governments permission to sue USPTO  
**Date:**2021-09-14 17:29  
**From:**srinivas@coolcartechnology.com  
**To:**aslegal@mea.gov.in  
**Cc:**eam@mea.gov.in, secywest@mea.gov.in

To,  
Mrs. Uma Sekhar, Additional Secretary L&T Division, MEA India

The certified true copy of the Court order sheet for OS 2487 of 2021, that I received today is attached with this communication. I refer you to the Honorable Judges comments on page 3 dated 3/7/2021.

The Judge records 'receipt of approval from MEA to address argument on maintainability of the suit'. The only remaining argument is your 'Consent letter' to sue USPTO, summon WIPO, and IPI

for fact checking purposes. My next hearing date is on 21/9/2021.

I cite CPC section 86 clause 6 for you to provide me reasonable time to hear my lawsuit. And if you have, up on your review of the lawsuit at my website, are ready to issue the consent letter, I look forward to the letter pdf file duly signed by you, Secretary to Indian govt, that I can submit to the court.

Srinivas S. Devathi

Inventor and Author

Srinivasdevathi.com, Projectearthling.com, Earthlingcurrency.com, Coolcartechnology.com

On 2021-09-09 19:29, srinivas@coolcartechnology.com wrote:

To,

Mrs. Uma Sekhar

Today I had a court hearing date on the lawsuit OS 2487 of 2021. The judge heard the matter and tells me that everything is in place, except the only missing 'Consent of the central government certified in writing by a secretary to that government', to address CPC section 86 to summon D1, D3, and D4 in the case.

I read the CPC section 86 in detail today, and clause 6 gives me the legal right to make my request for your consent and be given reasonable opportunity to be heard on the lawsuit.

I do not want this lawsuit also to be returned to me due to your consent letter pending. I REQUEST THAT YOU MAKE THIS SUBJECT A PRIORITY AND SCHEDULE DISCUSSION TIME NEXT WEEK. I do not want all the effort of working on this suit and proving the legal points to Honorable court to go waste.

On the contrary, according to CPC section 86 clause 2; if you (central government) have noted that sub-clauses a, b, c, or d applies to my case, you must let me know. I know USPTO has not instituted a suit against me. They do not trade in local limits of this jurisdiction.

Given all the above, could you immediately schedule discussion time, so that I could take this lawsuit forward, for the sake of justice, equality, and according to Patent Cooperation Treaty.

I look forward to your expedited response.

Srinivas S. Devathi

Inventor and Author

Srinivasdevathi.com, Projectearthling.com, Earthlingcurrency.com, Coolcartechnology.com



-1-

Document 3

roundcube



Subject **Read-Receipt: Fwd: Re: CPC Section 86 clause 6 gives me the reasonable opportunity of being heard since the court is waiting on governments permission to sue USPTO**

From Uma Sekhar <aslegal@mea.gov.in>

To <srinivas@coolcartechnology.com>

Date 2021-09-20 18:05

The message sent on September 20, 2021 at 6:00:09 PM GMT+05:30 to [aslegal@mea.gov.in](mailto:aslegal@mea.gov.in) with subject "Fwd: Re: CPC Section 86 clause 6 gives me the reasonable opportunity of being heard since the court is waiting on governments permission to sue USPTO" has been displayed. This is no guarantee that the message has been read or understood.

Reporting-UA: 164.100.42.2, 100.80.16.139; ZimbraWebClient - FF57 (Linux)/8.8.15\_GA\_2148  
Original-Recipient: rfc822;[aslegal@mea.gov.in](mailto:aslegal@mea.gov.in)  
Final-Recipient: rfc822;[aslegal@mea.gov.in](mailto:aslegal@mea.gov.in)  
Original-Message-ID: <[d68f665bbbd071cddfe8a9eef44bd87@coolcartechnology.com](mailto:d68f665bbbd071cddfe8a9eef44bd87@coolcartechnology.com)>  
Disposition: manual-action/MDN-sent-manually; displayed

IN THE COURT OF THE CITY CIVIL JUDGE AT  
BENGALURU (CCH – 10)

O. S. No. 42 / 2022

**BETWEEN:**

Srinivas S. Devathi

...Plaintiff

**AND:**

Legal and Treaties Division, Ministry of External Affairs

...Defendant

**VERIFYING AFFIDAVIT**

I, Srinivas S. Devathi, an Indian citizen, aged about 44 years, S/O Late D. Satyanarayana, residing at No. 63, 11<sup>th</sup> B Cross, 3<sup>rd</sup> Main, Prashanthnagar, Bengaluru – 560079, INDIA, do hereby solemnly affirm and state on oath as follows: I state that I am the plaintiff in the above case. I know the facts and circumstances of the case. Hence, I am swearing to this affidavit. Further, I state that I do not have any lawyer representing me in this case. And that I am appearing as party-in-person in front of the Hon'ble court. I am submitting the following memorandum to the court:

Memorandum for production of additional documents to the court, which include documents 2, 3, 4, 5, 6, 7, and 8, along with remarks on 'Cause of action' and CPC section 86(6). 619 Pages.

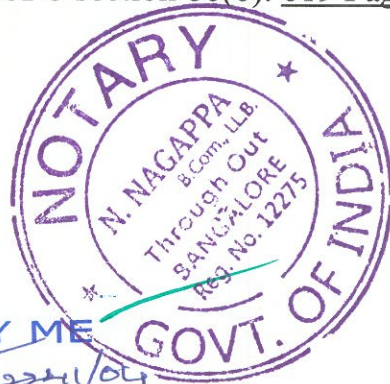
Identified by me,

IDENTIFIED BY ME

S. BHANUPRAKASH  
ADVOCATE  
Court, Bengaluru.

Bengaluru

Date: 27 JAN 2022



DEPONENT

"Sworn to before me"

N. NAGAPPA B.Com., LL.B.  
ADVOCATE & NOTARY  
GOVT OF INDIA  
No. 135, IVth Main Road  
VI Block, Banashankari 3rd Stage  
Phase RANGALORE 560 084

This Document is entered in the  
Notarial Register by No/2275 in  
Book 03 Pages 55 Dt. 27/1/22  
Sl-764  
N. NAGAPPA  
NOTARY  
GOVT. OF INDIA