

THE MELODY OF COVER VERSIONS *VIZ-A-VIZ* THE RIGHTS OF MUSIC INDUSTRY: AN ANALYSIS OF INDIAN LAW

DR. GURMINDER KAUR

Head (i/c) & Assistant Professor, School of Law, Pondicherry University, Puducherry.

Abstract

The Indian music industry has long been viewed as a colorful rainbow of many genres, languages, and customs. It has even had an impact on shaping the cultural fabric of our country. It has undergone a remarkable transformation in the last few decades, changing from physical records to digital platforms. This action has significantly expanded its global reach. However, this change has brought with it some complicated difficulties concerning copyright protection. In such cases, copyright rules serve as a strong backbone for the creative music industry, safeguarding the rights of all artists, composers, and record labels. These laws also help the industry's economic credibility. Establishing the ownership of work done under copyright law can many times pose difficulties, and this is exceptionally true for the music industry. The boundary which separates similar works is getting blurred and completely undefined in this sector. The vast amount of music-related content available online makes the task of recognizing rightful ownership highly complex. There is a high possibility of situations where unintentional use of some parts of formerly created work can happen. On top of that, we are presently in a period that is often referred to as the era of cover versions. Remaking songs is a common practice nowadays that is undeniably present at its peak now and is continuously rising. The Copyright Act has some clauses for cover songs. In the end, companies generate immense profits from the release of these songs or by incorporating them into movies while usually leaving the artists uncompensated. This paper aims at analysing the legal protection available to different authorised persons of a song and whether law is sufficient to support violation in the name of cover versions or not.

Research Methodology: Doctrinal Study

Study area: Copyright protection in case of cover versions of songs

Keywords: Music Industry, Copyright, Cover Version, rights of composers, rights of musicians, rights of producers.

INTRODUCTION

The Indian music industry has long been viewed as a colorful rainbow of many genres, languages, and customs. It has even had an impact on shaping the cultural fabric of our country. It has undergone a remarkable transformation in the last few decades, changing from physical records to digital platforms. This action has significantly expanded its global reach. However, this change has brought with it some complicated difficulties concerning copyright protection.

In such cases, copyright rules serve as a strong backbone for the creative music industry, safeguarding the rights of all artists, composers, and record labels. These laws also help the industry's economic credibility. Yet, the complications related to copyright laws are rapidly transforming the digital landscape, often directing the way to violations and disputes.

WHAT IS PROTECTED?

Copyright protection is the list of exclusive rights which are given to the creator of an original work. These rights are solely granted by the law of any specific country and give the creator power to distribute, reproduce, display, perform or license his or her work.

IMPORTANCE OF THIS PROTECTION TO THE MUSIC INDUSTRY?

Establishing the ownership of work done under copyright law can many times pose difficulties, and this is exceptionally true for the music industry. The boundary which separates similar works is getting blurred and completely undefined in this sector.

The vast amount of music-related content available online makes the task of recognizing rightful ownership highly complex. There is a high possibility of situations where unintentional use of some parts of formerly created work can happen. On top of that, we are presently in a period that is often referred to as the era of cover versions.

Remaking songs is a common practice nowadays that is undeniably present at its peak now and is continuously rising. The Copyright Act has some clauses for cover songs.

In the end, companies generate immense profits from the release of these songs or by incorporating them into movies while usually leaving the artists uncompensated.

A precise instance of such artist exploitation can be seen in a very famous song named 'Ud ja kale kava2.0'. The original 'Ud ja kale kava2.0' was a creation by great composer Uttam Singh.

Now the issue is that film producer Anil Sharma launched the second version of the song 'Ud ja kale kava2.0' without taking any consent from its original creator. This example shows us how the rights of record companies are under scrutiny.

MEANING OF COPYRIGHT

According to Section 14 of the Copyright Act, “For the purposes of this Act, “copyright” means the exclusive right subject to the provisions of this Act, to do or authorise the doing of any of the following acts in respect of a work or any substantial part thereof, namely:

- (a) in the case of a literary, dramatic or musical work, not being a computer programme-
 - (i) to reproduce the work in any material form including the storing of it in any medium by electronic means;
 - (ii) to issue copies of the work to the public not being copies already in circulation;
 - (iii) to perform the work in public, or communicate it to the public;
 - (iv) to make any cinematograph film or sound recording in respect of the work;

- (v) to make any translation of the work;
 - (vi) to make any adaptation of the work;
 - (vii) to do, in relation to a translation or an adaptation of the work, any of the acts specified in relation to the work in sub-clauses (i) to (vi);
- (b) in the case of a computer programme,—
- (i) to do any of the acts specified in clause (a);
 - (ii) to sell or give on commercial rental or offer for sale or for commercial rental any copy of the computer programme: Provided that such commercial rental does not apply in respect of computer programmes where the programme itself is not the essential object of the rental.
- (c) in the case of an artistic work,—
- (i) to reproduce the work in any material form including— (A) the storing of it in any medium by electronic or other means; or (B) depiction in three-dimensions of a two-dimensional work; or (C) depiction in two-dimensions of a three-dimensional work;
 - (ii) to communicate the work to the public;
 - (iii) to issue copies of the work to the public not being copies already in circulation;
 - (iv) to include the work in any cinematograph film;
 - (v) to make any adaptation of the work;
 - (vi) to do in relation to adaptation of the work any of the acts specified in relation to the work in sub-clauses (i) to (iv);
- (d) in the case of a cinematograph film,—
- (i) to make a copy of the film, including— (A) a photograph of any image forming part thereof; or (B) storing of it in any medium by electronic or other means;
 - (ii) to sell or give on commercial rental or offer for sale or for such rental, any copy of the film;
 - (iii) to communicate the film to the public;
- (e) in the case of a sound recording,—
- (i) to make any other sound recording embodying it;

(ii) to sell or give on commercial rental or offer for sale or for such rental, any copy of the sound recording;

(iii) to communicate the sound recording to the public.”

In the case of *The Gramophone Company of India Ltd vs. Super Cassette Industries Ltd*,¹ the Hon’ble Judge has remarked, “What is a version recording? A version recording, we are told, is a sound recording made of an already published song by using another voice or voices and with different musicians and arrangers. Version recording is thus neither copying nor reproduction of the original recording”. Infringing copy” with reference to a sound recording, which is relevant, is defined under Section 2(m) (iii), thus: “infringing copy” means,- in relation to a sound recording, any other recording embodying the same sound recording, made by any means. Section 13 defines the works in which copyright subsists. It provides that copyright shall not subsist in any sound recording made in respect of a literary, dramatic or musical work, if in making the sound recording; copyright in such work has been infringed.

WHAT ARE VERSION RECORDINGS OF A SONG?

‘Cover Version’ or ‘Version Recordings’ are fresh renditions of previously published songs made using a new set of musicians, performers and artists in a studio of their own and producing a record which is entirely different from the original recording. Cover versions are often contemporary versions of familiar songs. These artists sing these songs, sometimes as a tribute to their favourite artists in their own style and giving it their personal touch. The question is whether these cover versions of the original songs evoke issues of copyright infringement in original songs? The Copyright Amendment Act, 2012 brought in a phenomenal change with respect to the rights of music directors, lyricists and performers. Javed Akhtar’s maiden speech in Rajya Sabha for Amendment to Copyright Bill 2010 made a very persuasive speech and was instrumental in lobbying for the amendments.² Section 31C of the Copyright Amendment Act, 2012 deals with statutory licenses that can be obtained for making a sound recording in respect of any literary, dramatic or musical work. Cover version means a sound recording made in accordance with the above-mentioned section. “There can be two forms of licenses that legalise this action i.e. Statutory licenses and General licenses. While a statutory license is governed by the provisions of this Act, a general license is made on the terms and conditions as agreed upon between the licensor and licensee.³ This section also lays down various other rules which one has to abide by while making a cover. The person making the sound recordings should give prior notice of his intention to make the sound recordings. Such sound recordings shall be in the same medium as the last recording unless the medium of the last recording is no longer in current commercial use. Copies of the covers/labels have to be disclosed to the owner of the sound recording prior to the release of the cover version. The cover version should explicitly mention that it is a cover version of the original sound recording. There should be no alteration of the sound record unless it is

technically necessary. Statutory licenses are not mandatory. If an artist wants to make a cover version before the expiry of 5 years of the original work or wants to negotiate on the point of royalty, he has the option of acquiring a general license. The production of covers without the consent of the owner of the original song amounts to copyright infringement. The owner is entitled to civil remedies like an injunction, etc. when such violations occur.”⁴

“The principle of making cover versions without express consent is an accepted practice in various parts of the world. The Indian Copyright Act, 1957 that has already been amended five times prior in 1983, 1984, 1992, 1994 and 1999, was recently amended in 2012. The amendment of 2012 brought about many important changes including clarifying the copyright issues pertaining to cover versions which will be dealt with below. In order to understand the legal implications of the cover versions in India, it may be necessary to take note of some of the relevant legal provisions.”⁵

PRE-2012 AMENDMENT SCENARIO OF PROTECTING COVER VERSIONS OR VERSION RECORDINGS UNDER THE ACT:

A. NATURE OF LICENSES UNDER THE ACT:

- “1. The Act has carved out a clear distinction between voluntary license and non-voluntary license.
2. Voluntary license is categorically provided under Section 30 of the Act whereby both parties are to consent to the terms of the license.
3. Non-voluntary licenses are of two types under the Act:
 - a) Compulsory license under Section 31 and 31A of the Act;
 - b) Statutory compulsory license under Section 52(1)(j) of the Act read with Rule 21 of the Copyright Rules.”

B. STATUTORY COMPULSORY LICENSE UNDER THE ACT:

1. Section 52 of the Act provides *inter alia* as follows:

(1) *The following acts shall not constitute an infringement of copyright, namely:*

(j) *the making of a sound recording in respect of any literary, dramatic or musical work, if*

(I) *“...sound recordings of that work have been made by or with the licence or consent of the owner of the right in the work.”*

(Ii) *“...the person making the sound recordings has given a notice of his intention to make the sound recordings, has provided copies of all covers or labels with which*

the sound recordings are to be sold, and has paid in the prescribed manner to the owner...”

2. Further, Rule 21 of the Copyright Rules provides for: “...making of records

(1) any person intending to make sound recordings under clause (j) of sub-section (1) of section 52 shall give a notice of such intention to the owner of the copyright and to the Registrar of Copyrights at least 15 days in advance of making such sound recordings... amount of royalties due...to be made at the rate fixed by the Copyright Board...”

REQUIREMENTS UNDER SECTION 52 (1) (J) OF THE COPYRIGHT ACT, 1957:

a) Consent is not a necessary ingredient:

i. Sub-clause (i) refers to the expression “*sound recordings of that work*”. The use “that” before work, means that the work links back to what was already mentioned. Therefore, “that work” herein refers to the “literary, dramatic and musical work”;

ii. If “sound recordings” here referred to the version recordings which are the subject of the exemption, then the link back to them would have been expressed by referring to them as “the sound recordings” or “the said sound recordings” or “such sound recordings”. The definite article has been elided precisely because the words “sound recordings” here connote any sound recordings.

iii. Thus, the said sub-clause is only applicable to sound recordings of the works wherein such works have been authorisedly utilised for making of sound recording before the cover version recording is made. It was held by the Supreme Court in *Gramophone Co. v Mars Recording*,⁶ that in as much as the requirements under Section 52(1) (j) of the Act and Rule 21 of the Rules are satisfied, there is no violation and that the consent requirement is only for the first recording. The said reasoning was also adopted recently in *M/s Mars Recording Pvt Ltd v M/s Saregama India Ltd.*,⁷

iv. Further, if consent was necessary, there would not have been a separate Section 52(1) (j) and Section 30 would have sufficed in this regard.

v. The fact that such a clause is not provided under voluntary license requirement under Section 30 shows the legislative scheme of dispensing with the requirement of consent in case of cover versions.

vi. When the Act was first passed, the corresponding section stated:

(j) the making of records in respect of any literary, dramatic or musical work, if –

(i) records recording that work have previously been made by, or with the license or consent of, the owner of the copyright in the work.

Thus, the intention was that only the initial recording required the consent of the copyright owner by using the word ‘previously’, and not the subsequent recording i.e. the cover version. The judgment of the Delhi High Court, *Gramophone v Super Cassettes Industries Ltd.*⁸ has analysed this aspect in detail and it has been held that:

“...in respect of a literary, dramatic or musical work, which has been circulated to the public by the author himself or under his authority, by making a sound recording, the protection of the author’s copyright is diluted so far as the making of subsequent recordings is concerned. Though, he continues to own the copyright, his express consent is not necessary...”.

b) Notice of intention:

“Sub-clause (ii) refers to - the person making the sound recordings has given a notice of his intention to make the sound recordings, has provided copies of all covers or labels with which the sound recordings are to be sold...”

c) Royalty:

Under Sub-clause (ii), work royalties have to be paid. The same has already been pre-worked and pre-declared by the Copyright Board so that no petition is necessary to the Copyright Board to fix the royalty in each separate case.⁹

d) Other requirements:

“i. No alterations shall be made which have not been made previously by or with the consent of the owner of rights, or which are not reasonably necessary for the adaptation of the work for the purpose of making the sound recordings. The same has been provided in recognition of the moral rights of the author protected under S. 57 of the Act;

ii. The packaging or label should not be misleading or confuse the public as to their identity;

iii. No such recording shall be made until the expiration of two calendar years after the end of the year in which the first recording of the work was made; and

iv. The person making such sound recordings shall allow the owner of rights or his duly authorised agent or representative to inspect all records and books of account relating to such sound recording.”¹⁰

e) Section 52(1)(j)(i) and 52(1)(j)(ii): “Another issue which needs considerable unravelling is whether sub-clauses (i) and (ii) of Section 52 (1)(j) should be read “disjunctively” or “conjunctively” which was brought up due to deletion of ‘and’ between the two clauses by the amending Act of 1994. It was first considered in the case of *Gramophone Co. of India Ltd. v. Mars Recording Pvt. Ltd. & Ors.*,¹¹ which was later appealed to the Supreme Court *Gramophone Co. of India Ltd. v. Mars Recording Pvt. Ltd. & Ors.*,¹² As per the Karnataka High Court, the two sub-clauses should be read disjunctively and not together and the same reasoning has been followed in subsequent cases as well. However, as per the said interpretation, it would mean that a cover version might be made with the permission of the copyright owner under the first clause; and alternatively by proceeding under the second sub-clause by following the procedure laid down therein. The said interpretation suffers from a serious flaw as it assumes that the first two words of sub-clause (i) refer to the sound recording of the cover version. Further, based on the above reasoning, if we were to read them disjunctively, assuming an “or” between them, the consequences would be absurd. The Supreme Court, however did not express any opinion and merely held that the facts were not established.”¹³

The correct interpretation mandates that the sub-clauses are conjointly read and thus, the ingredients of Section 52(1)(j) should be:

- a) That there is a literary, dramatic or musical work from which a person desires to make sound recordings;
- b) Sound recordings in respect of such works have been previously made with the consent of the copyright owner;
- c) The person making the records has given a prescribed notice and paid the prescribed royalty at the rate fixed by the Copyright Board subject to the other conditions.¹⁴

It is pertinent to note that Section 31 C after the amendment of 2012 supports a conjoint reading by using the words “...where sound recording of that work have been made by or with the license or consent of the owner”. Thus, clarifying that it is a pre-requisite in case of cover version of a sound recording that a sound recording of that work has been made by or with the consent of the author.

POST 2012 AMENDMENT SCENARIO OF COVER VERSIONS/ VERSION RECORDINGS

“Due to the deluge of litigation, the position of cover versions and version recordings was clarified through the insertion of Section 31 C which reads ‘Statutory License for Cover Versions’. As per the committee report on copyright amendment, which was duly approved by the committee in its meeting held on 18 November 2010, it was further clarified that

Section 31 C was not a new provision for statutory licence for cover version, but replacement of section 52(1) (j) for improved clarity.”¹⁵ The said amendment was carried out with the view that continuation of fair use clause with statutory license under 52 (1) (j) needs to be removed from the list of fair dealing under section 52 and be placed under Chapter VI i.e., licences. Section 31 C has the following conditions:

- a) Requirement of same medium as the original.
- b) Time period after which a cover version can be made has increased from 2 years to 5 years.
- c) Payment has to be made in advance, and for a minimum of 50000 copies which may be lowered by the Copyright Board if the works are of a particular language or dialect.
- d) Cover versions have an additional requirement wherein they are not allowed to ‘contain the name or depict in any way any performer of an earlier sound recording of the same work or any cinematograph film in which such sound recording was incorporated’ along with the requirement of being misleading or confusing to the public regarding its identity.
- e) Cover versions must state that they are cover versions.
- f) No alterations are allowed in the literary or musical work which has not been made previously or with the owner’s consent. Under the earlier provision, alterations were allowed if they were ‘reasonably necessary for the adaptation of the work’. However, as per the amendment now they are only allowed if it is ‘technically necessary for the purpose of making of the sound recording.”

Some cases have arisen both in India and abroad where it has been contended that sound-alike recordings are an infringement of the original sound recording even though the same may have been validly made under the statutory mechanical licensing provisions. Fortunately, this illogical contention has been rejected by the courts; each sound recording constitutes the recording of a separate performance by a different set of performers and musicians and results in a new sound recording capable of being protected under copyright. In *Mars Recording Private Limited v. Saregama India Limited*,¹⁶ it has been clearly stated that “It would not be an infringement of copyright in a sound recording if the same has been made with the consent or by license of the copyright owner. If a negotiated consent is not possible, a person becomes legally entitled to make a sound recording of such a copyrighted sound recording by recourse to the procedure prescribed and subject to the conditions that would apply. It is to be emphasized that it, however, does not entitle the person to make a copy or a duplication of the sound recording. But is entitled to produce a “version recording”, which is a fresh recording using a different set of performers, musicians and artists and

facilities. It would be a “sound alike” recording or a close imitation, of the original sound recording and would not be an infringement of the copyright.” As long as the cover versions are not intended to be economical in purpose, they can’t be violative of copyright laws.

REGISTRATION PROCESS FOR COPYRIGHT PROTECTION

The whole procedure for copyright registration is precisely detailed in the Copyright Rules.

To register your work as a copyright, one must fill out Form XIV and submit it with the required fee straight to the Registrar of Copyrights (“Registrar”). This form ought to be signed by the applicant.¹⁷

If the copyright owner is filling out the application, then a No Objection Certificate (NOC) from any other authors who were involved in the song's creation—such as the composer, lyricist, or producer—needs to accompany the application. This can be either mailed to the Registrar or submitted online through the Indian Government's copyright website. The applicant is mandated to notify all people who claim an interest in the copyright subject matter. If the Registrar affirms the accuracy of the application's details and gets no objections within thirty days of the application's filing, then they will proceed to record the copyright in their register. However, if the Registrar challenges the accuracy of the application's information, an inquiry can be conducted. Based on the results of this inquiry and after providing the applicant with a chance to be heard, the Registrar can decide to accept or reject the application. In situations where the Registrar receives objections to the application, all parties concerned are given an equal opportunity to raise their case. Following the inquiry and the hearing of all parties, the Registrar proceeds to record the details in their register. The registration process is considered complete only when the Registrar signs the copy of the copyright entry in their register.¹⁸

WHO ARE THE AUTHORIZED PERSONS OF A SONG?

A song isn't viewed as a single entity under the Copyright Act; instead, it is split into various components, each of which can be easily copyrighted by its respective creator. In case only one person is writing, composing, and singing a song, he can claim the copyright over the entire song.

With this understanding, now let's see the rights of contributors to a song:

Lyricist: According to Section 2(d)(i) of the Act, “the author of any literary work is the person who has written it. In the context of songs, this would be a lyricist. Since the song lyrics are a literary work under the Act, the lyricist has full right to secure copyright for himself as the author.”

Composer: Section 2(d)(ii) of the Act specifies “the composer as the author of a musical work. Musical work, as clarified by Section 2(p) of the Act, is the work consisting of music,

including any sort of graphical notations but excluding words or actions planned to be sung, spoken, or performed with the music.”

Therefore, the composer who creates music for the song can obtain a copyright for the song's background music.

Singer: The Act's Section 2(qq) defines a performer as “the singer of the song. The singer holds all rights related to their performance. They have the power to record their performance, reproduce it as per wish, issue copies of it on any electronic medium, and sell the copies.”

They also have the right to protect their copies or recording against violation. However, these performers' rights do not touch upon the rights of the song's author, i.e., the lyricist and composer.

Producer: According to Section 2(d)(v) of the Act, “the person who is responsible for the sound recording is believed to be the author of that particular recording. Section 2(uu) defines the producer of a sound recording as an individual who takes the initiative and accountability for making it.”

Given that the producer supervises the recording of the song and its distribution in any kind of movie or album, they are the author of the song's recording. Hence, they, too, secure the copyright for the song.

RIGHTS OF A SONG OWNER

Here are some of the main rights that any song owner holds over his/her creations:¹⁹

1. ECONOMIC RIGHTS

These rights, which are detailed in Section 14 of the Act, apply to all authors of copyrightable work and include:

Right to Reproduction (14 a(i)): This right is retained by the original author of any musical, literary, or artistic kind of work, allowing them full power to reproduce their work in any tangible form. For instance, copying a song on Disc or releasing it on some sort of platform like YouTube. This approach is considered reproduction.

Right to Issue Copies (14 a(ii)): This right can be viewed as an extension of the right to reproduce. It endows the copyright holder authority to distribute his music or other literary work in any method they choose. They can even transfer their copyright-related rights partially or wholly. For example, distribution rights can be given to a music label.

The composer of a song can publish copies for public viewing, provided that these copies do not already exist in the public domain.

Performance Rights (14 an (iii)): This right permits the copyright holder to publicly perform all created works. For example, a lyricist has the full right to repeat the lyrics of a song they previously wrote at any public event.

Right to Make Adaptations and Translations (14 a(v)&(vi)): As the original owner of the musical work, the author is given the right to adapt or translate their work. A beautiful example of this is the song 'Zingaat,' initially in Marathi but further got translated into Hindi.

2. MORAL RIGHTS

Section 57 of the Copyright Act blesses authors with certain unique rights that are present independently of whether the author has shared their copyright-related rights or not, as was established in the Ilayaraja case. These include:

Right to Paternity (57 1(a)): The Act enables the author to claim their authorship over their work. In simple words, even after transferring their work-associated rights to a producer or music label, they can retain the right to be identified as the work's originator.

Right to Restrain (57 1(b)): If the author's work is mutilated, distorted, or altered in such a way that it harms the author's honour or reputation, then the author has the whole right to seek damages.

3. PERFORMERS RIGHTS

These rights, described under Section 38 of the Copyright Act, apply to the singer of a song for their ability as a performer. The Act allows a performer to:

a. Make a sound or visual recording of the performance, this includes:

- Reproducing it in any sort of physical form, including reserving it in any medium.
- Releasing copies to masses that are not already in circulation.
- Communicating it to the public.
- Selling it, proposing it for commercial rental, or placing it up for sale.

b. Broadcasting or communicating their performance to the public before the performance has already been broadcast.

PENALTIES FOR INFRINGEMENT IN CASE OF MUSIC

Section 63: Offence of infringement of copyright or other rights conferred by this Act.—

“Any person who knowingly infringes or abets the infringement of— (a) the copyright in a work, or (b) any other right conferred by this Act 1 [except the right conferred by section 53A], 2 [shall be punishable with imprisonment for a term which shall not be less than six months but which may extend to three years and with fine which shall not be less than fifty thousand rupees but which may extend to two lakh rupees]: Provided that 1 [where the

infringement has not been made for gain in the course of trade or business] the court may, for adequate and special reasons to be mentioned in the judgment, impose a sentence of imprisonment for a term of less than six months or a fine of less than fifty thousand rupees.]

Explanation— Construction of a building or other structure which infringes or which, if completed, would infringe the copyright in some other work shall not be an offence under this section.”

Section 63A. Enhanced penalty on second and subsequent convictions— “Whoever having already been convicted of an offence under section 63 is again convicted of any such offence shall be punishable for the second and for every subsequent offence, with imprisonment for a term which shall not be less than one year but which may extend to three years and with fine which shall not be less than one lakh rupees but which may extend to two lakh rupees:

Provided that where the infringement has not been made for gain in the course of trade or business the court may, for adequate and special reasons to be mentioned in the judgment, impose a sentence of imprisonment for a term of less than one year or a fine of less than one lakh rupees.”

CONCLUSION

From the perusal of the analysis discussed above it is amply clear that there is very strong legal protection in case Cover Versions of songs are recorded. There is a clear procedure of licencing and consent. However, there is absolutely no mention of performers singing recreated versions of song. For instance, a boy sings a popular song on his guitar with a different music background, makes a video and uploads on youtube and makes money after garnering large number of views on that video... Which law governs this scenario, still there is no clarity on the same. There is still huge scope of amendment in this law keeping in mind the creative ways of infringing creativity on digital media.

REFERENCES

1. 58 (1995) DLT 99.
2. Overview Of Copyright Law In Relation To Sound Recording And Musical Composition - iPleaders available at <https://blog.ipleaders.in/overview-copyright-law-relation-sound-recording-musical-composition/>
3. Section 31C of the Copyright Act, 1957.
4. Supra note 1
5. <https://www.medialawinternational.com/page127.html>
6. 2001 PTC 681 (SC)
7. RFA No.125 of 2009 in its order dated 20 January 2015
8. 01 July 2010 (44) PTC 541
9. <https://www.medialawinternational.com/page127.html>
10. Section 57, Indian Copyright Act, 1957.

11. 2000 PTC 117
12. 2001 PTC 681 (SC)
13. <https://www.medialawinternational.com/page127.html>
14. <https://www.medialawinternational.com/page127.html>
15. <https://www.medialawinternational.com/page127.html>
16. Regular First Appeal No. 125 of 2009
17. <https://restthecase.com/knowledge-bank/copyright-protection-in-the-indian-music-industry>
18. <https://restthecase.com/knowledge-bank/copyright-protection-in-the-indian-music-industry>
19. <https://restthecase.com/knowledge-bank/copyright-protection-in-the-indian-music-industry>