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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**
+ **W.P.(C) 12399/2025& CM APPL. 79126/2025**
TLG INDIA PRIVATE LIMITED

.....Petitioner

Through: Mr. Ritin Rai, Senior Advocate with
Ms. Avaantika Kakkar, Mr. Aman
Singh Baroka, Mr. Pushkar
Shailendra Singh, Ms. Ankita Gupta,
and Mr. Varun Singh, Advocates. Ms.
Anupama Grover Dhir, Vice
President, Legal at TLG India Private
Limited.

versus

COMPETITION COMMISSION OF INDIA & ANR.

.....Respondent

Through: Mr. Jayant Mehta, Sr. Adv. along
with Mr. Saurabh Chadda, Mr. Rohit
Bhagat, Mr. Pallav Arora and Ms.
Aprajita, Advocates for CCI.

CORAM:

HON'BLE MR. JUSTICE PURUSHAINDR KUMAR KAURAV

ORDER

% **17.02.2026**

1. The present writ petition has been filed by TLG India Private Limited under Articles 226 and 227 of the Constitution of India challenging the legality and validity of the investigation initiated pursuant to order dated 09.08.2024 passed by the Competition Commission of India in Suo Motu Case No. 02 of 2024 under Section 26(1) of the Competition Act, 2002.
2. The grievance of the petitioner is that the investigation has been directed not against a legally identifiable “enterprise” within the meaning of Section 2(h) of the Act, but against a vague and undefined brand name, “Publicis Groupe”, which is not a legal entity in India or France.



3. It is seen that as of now, from the entire counter affidavit filed by the respondent, there do not seem to be any notices to TNG India Pvt. Ltd, i.e., the petitioner. In paragraph no. iii of the counter affidavit, the respondent-Competition Commission of India has taken the following:-

(iii) The petition is also not maintainable as the petitioner is essentially seeking its substitution in the proceeding before the Respondents in place of "Publicis Groupe". The Respondent No. 1 has already issued notice to "Publicis Groupe S.A." at its address in France. Given that the Petitioner claims to be a part of that Groupe in India, the said "Publicis Groupe" can merely reply to Respondent No. 1 's notice. However, it has not done so. Without "Publicis Groupe SA" replying or claiming that it would be represented by the Petitioner, the petitioner has no locus. In any case, the remedy lies before the Respondent No. 1 (Competition Commission of India) by filing an appropriate application either under Regulation 25 or Regulation 26 of the Competition Commission of India (General) Regulations 2024."

4. It is an admitted position that no notice, as on date, has been issued to the present petitioner. The grievance sought to be projected is that the notices have been addressed to "Publicis Groupe", which, according to the petitioner, is not a legally existing or identifiable entity.

5. However, whether the entity to whom notice has been issued is correctly described, or whether it answers the definition of an "enterprise" within the meaning of Section 2(h) of the Act, are matters that fall within the domain of the Competition Commission of India to examine and determine in the course of its proceedings.

6. In the absence of any notice having been issued to TLG India Private Limited, no cause of action presently survives in its favour. Accordingly, the present petition is disposed of. All rights and contention are left open.



PURUSHAINdra KUMAR KAURAV, J
FEBRUARY 17, 2026/ng/mj