



# The Indian Journal for Research in Law and Management

Open Access Law Journal – Copyright © 2025

Editor-in-Chief – Dr. Muktai Deb Chavan; Publisher – Alden Vas; ISSN: 2583-9896

This is an Open Access article distributed under the terms of the Creative Commons Attribution-Non-Commercial-Share Alike 4.0 International (CC-BY-NC-SA 4.0) License, which permits unrestricted non-commercial use, distribution, and reproduction in any medium provided the original work is properly cited.

---

## USE OF PUBLIC DOMAIN MATERIAL IN MODERN CINEMA

*Saanhvi Srivastava*

### ABSTRACT

This research investigates the legal challenges and gaps in using public domain materials in modern Indian cinema, asking: *What are the legal challenges and gaps in using public domain materials in modern Indian cinema, and how can these issues be resolved?* While classical literature, folklore, and expired copyrighted works offer filmmakers creative freedom and accessible content, their use often brings legal uncertainty. Although public domain works are assumed to be free for reuse, the reality is far more complex. The Copyright Act of 1957, drafted for a pre-digital era, does not adequately address the challenges posed by streaming platforms, AI-generated adaptations, digital restoration, and international copyright discrepancies.

Filmmakers often struggle to distinguish truly public domain material from protected derivative works. Conflicting copyright terms across countries complicate global distribution, while automated takedown systems sometimes misidentify legitimate use. The question of who holds rights in AI-generated adaptations further blurs ownership. This study examines judicial interpretations, statutory provisions, and international practices such as Disney's approach to legacy content to highlight the outdated nature of current legal frameworks. It proposes a range of reforms: the creation of a centralised Public Domain Registry, specialised IP courts equipped to handle digital content issues, the development of industry-wide best practices, legal education efforts, and steps toward international harmonisation. These recommendations aim to provide legal certainty while preserving India's rich cultural heritage and supporting creative growth in a rapidly evolving entertainment landscape.

**Keywords:** Public domain, Indian cinema, Copyright law, Digital distribution, Intellectual property

## INTRODUCTION

Modern cinema typically refers to films produced from the late 20th century<sup>1</sup> to the present day, especially those shaped by contemporary storytelling techniques, digital technology, and global cultural shifts. Although public domain materials<sup>2</sup> are often seen as free for anyone to use, bringing them into modern cinema isn't always so straightforward. Filmmakers still have to navigate a web of legal and ethical issues ranging from moral rights and protections for derivative works to new challenges posed by the digital age, where the idea of creative freedom often runs up against complex boundaries.

The intersection of intellectual property law and cinema has grown increasingly complex in the digital age. Public domain works no longer under copyright are widely used in contemporary filmmaking, including Bollywood adaptations of literary epics and Hollywood's reinterpretations of folklore<sup>3</sup>. In India, with its prolific film industry and rich cultural sources, effective use of such materials is vital for both creativity and commerce. However, evolving technologies and global distribution have outpaced the protections offered by the Copyright Act, 1957<sup>4</sup>, revealing critical legal gaps in areas like digital reproduction, moral rights, and the treatment of derivative works.

Public domain works like old epics, folktales, or classic novels are often seen as free material for filmmakers.<sup>5</sup> They offer creative freedom, reduce costs, and connect easily with audiences. But in practice, using them can be legally risky. The biggest challenge lies in the blurry line between what's truly in the public domain and what's still protected by copyright. For example, while the

---

<sup>1</sup> Robert Sklar & David A. Cook, *Transition to the 21st Century*, in *History of Film*, *Encyclopaedia Britannica* (last updated June 20, 2025), <https://www.britannica.com/art/history-of-film> (visited July 19, 2025).

<sup>2</sup> Sheila Curran Bernard & Kenn Rabin, *Copyright and Public Domain: An Updated Primer*, *Documentary Magazine* (June 13, 2020), <https://www.documentary.org/feature/copyright-and-public-domain-updated-primer> (last visited July 19, 2025).

<sup>3</sup> Khurana & Khurana, *Copyright Infringement: Bollywood v. Hollywood*, Khurana & Khurana (June 28, 2022), <https://www.khuranaandkhurana.com/2022/06/28/copyright-infringement-bollywood-v-hollywood/> (last visited July 19, 2025).

<sup>4</sup> Copyright Office, Government of India, *Copyright Office*, ("Copyright Office"), <https://copyright.gov.in/> (last visited July 19, 2025).

<sup>5</sup> Ernie Smith, *When Copyright Goes Copywrong: The Rigid Nature of Early Film Copyright and its Public-Domain Aftermath*, *Tedium* (Oct. 24, 2017), <https://tedium.co/2017/10/24/public-domain-film-history-copyright/> (last visited July 19, 2025).

original story of *Shakuntala* may be free to use, a 2005 Hindi translation, a TV adaptation from the 1980s, or even newly composed background music may still be copyrighted. These newer versions often blend so closely with the original that it becomes hard to separate what's free from what's not.

Filmmakers may unintentionally include a protected line of dialogue or a visual element from a modern adaptation, thinking it's part of the original. The problem deepens with composite works, where scripts, music, visuals, and now even AI-generated content come from multiple sources each with different rights.

The global nature of film distribution adds another layer of difficulty. A work that is public domain in India may still be under copyright in the U.S. or Europe. Streaming platforms like Netflix or Amazon must comply with multiple legal systems, making content clearance more complex. AI brings even more confusion: who owns the rights to an AI-generated adaptation of a public domain story? With no clear legal answers, filmmakers face uncertainty at every step.

In short, the freedom offered by public domain works is often shadowed by legal grey areas, where unclear boundaries and outdated laws make creative reuse more complicated than it seems.

## **PUBLIC DOMAIN UNDER INDIAN COPYRIGHT ACT**

Public domain forms a cornerstone of intellectual property law, referring to creative works that are either no longer protected by copyright or were never eligible for such protection. In the Indian legal context, it includes a wide array of cultural, literary, and artistic material that can be freely used, adapted, or commercialised without seeking permission from any rights holder. This concept holds particular importance in Indian cinema, where filmmakers have long drawn inspiration from classical texts, folklore, historical episodes, and works with expired copyrights to craft modern narratives.

While the Indian Copyright Act, 1957, does not specifically define the term "public domain," it outlines the pathways through which works enter it, primarily via the expiration of copyright terms. In some cases, works may also fall into the public domain through government publication or voluntary release by the original creators. This framework reflects a deliberate balance: it rewards creators with limited-time protection while ultimately ensuring public access to the country's rich cultural and intellectual heritage.

## **STATUTORY FRAMEWORK UNDER THE COPYRIGHT ACT**

The Copyright Act, 1957<sup>6</sup> through its successive amendments lays down distinct terms of protection for various categories of works relevant to filmmaking. Under Section 27, cinematograph films are granted copyright for sixty years, beginning from the start of the calendar year following the year of publication. This comparatively shorter duration, when contrasted with other forms of creative works, reflects the industrial and collaborative nature of film production.

However, the legal complexity arises from the fact that a film is not a single unified work, but a combination of multiple creative components. Literary works such as novels, scripts, and screenplays are protected for the lifetime of the author plus sixty years posthumously, as per Section 22. Musical and artistic works receive similar treatment under Sections 23 and 24, respectively. As a result, different elements of a single film may enter the public domain at different times, necessitating detailed legal scrutiny to assess the copyright status of the film as a whole.

Section 13 of the Act enumerates the types of works eligible for copyright protection and specifically recognises cinematograph films as a distinct category. This classification affirms that films enjoy copyright protection independently of the underlying literary, musical, or artistic works they may include. Therefore, even if the source material such as a novel is in the public domain, the film adaptation itself can still be protected as a unique creative expression.

## **JUDICIAL INTERPRETATION AND EVOLUTION**

Indian courts have gradually developed a nuanced body of jurisprudence concerning the use of public domain materials, particularly in the context of film adaptations and derivative works. The Supreme Court has consistently upheld the principle that copyright protects the *expression* of an idea, not the idea itself. This has allowed multiple filmmakers to adapt the same public domain source such as an epic or a historical event so long as each version represents a distinct and original cinematic interpretation.

In the landmark case of *R.G. Anand v. Delux Films and Others*<sup>7</sup>, the Supreme Court laid down a foundational rule: there can be no copyright in general ideas, themes, or plots, especially when

---

<sup>6</sup> Intellectual Property & Legal Filings, *Copyright of Cinematograph Films: Indian Scenario*, Intellectual Property & Legal Filings (Apr. 26, 2023), <https://www.ipandlegalfilings.com/copyright-of-cinematograph-films-indian-scenario/> (last visited July 19, 2025).

<sup>7</sup> *R.G. Anand v. Delux Films*, A.I.R. 1978 S.C. 1613 (India).

drawn from public domain sources. The Court clarified that infringement arises only when there is substantial similarity in the *manner of expression*, not in the underlying concept. This principle has been central to the legal acceptance of multiple film adaptations of classical works like the *Ramayana*, *Mahabharata*, or the writings of Rabindranath Tagore.

The Delhi High Court, in *Yash Raj Films Pvt. Ltd. v. Sri Sai Ganesh Productions*<sup>8</sup>, reinforced this understanding by holding that the use of public domain historical events or personalities does not automatically strip a film of copyright protection. The judgment drew a clear line between facts in the public domain and the original creative expression used to present those facts, affirming that filmmakers retain rights over their distinctive treatment and narrative style.

More recently, courts have begun to engage with the new legal questions raised by digital technologies. The Bombay High Court, in various proceedings, has acknowledged the emerging complications of digital restoration, global streaming, and the re-use of public domain content in a borderless digital environment. However, clear and comprehensive judicial precedents on these digital-age challenges are still evolving.

### **SPECIFIC PROVISIONS RELEVANT TO CINEMA**

Section 14 of the Copyright Act outlines the exclusive rights granted to copyright holders, including the right to adapt literary, dramatic, or musical works into cinematograph films. By implication, once a work enters the public domain, these exclusive rights lapse, allowing filmmakers to adapt such works freely for cinematic purposes. However, the provision also affirms that derivative works such as film adaptations may themselves qualify for new copyright protection, provided they exhibit sufficient originality in their expression.

Section 52 of the Act, which deals with fair dealing<sup>9</sup> exceptions, primarily applies to copyrighted works but has relevance in shaping judicial interpretation of transformative use. These exceptions covering uses for criticism, review, and reporting help inform how courts distinguish between lawful use of public domain material and instances that may encroach upon residual or derivative rights.

---

<sup>8</sup> *Yash Raj Films Pvt. Ltd. v. Sri Sai Ganesh Prods.*, 2019 (80) P.T.C. 200 (Del. HC) (India).

<sup>9</sup> Dipak Rao & Sana Singh, *Acceptable Use of Copyrighted Material*, Singhanian & Co. (June 10, 2020), <https://singhanian.in/blog/acceptable-use-of-copyrighted-material> (last visited July 19, 2025).

Further complexities arise under Section 25, which addresses works of anonymous or pseudonymous authorship. Many traditional stories, folk compositions, and historical texts fall into this category, where authorship cannot be clearly identified. This uncertainty can complicate the determination of whether such works have entered the public domain, thereby affecting the legal position of filmmakers and others seeking to adapt them.

### **MORAL RIGHTS CONSIDERATION**

An often-overlooked dimension in public domain analysis is the continued relevance of moral rights even after the expiration of economic rights. Section 57 of the Copyright Act confers moral rights on authors, including the right to be credited for their work and the right to object to any distortion or modification that harms their reputation. Although the Act does not clearly specify whether these rights persist after the economic copyright has lapsed, this legal ambiguity can create complications for filmmakers adapting public domain works.

Internationally, conventions such as the Berne Convention of which India is a signatory recognise that moral rights may extend beyond the term of economic rights. This implies that even when a literary work has entered the public domain, filmmakers may still be expected to credit the original author and refrain from interpretations that could be seen as disrespectful or damaging to the author's legacy.

These issues are particularly relevant when adapting works of long-deceased authors whose commercial rights have expired, but whose moral rights may still hold ethical or legal weight. Modern Indian cinema, in reimagining classical literature, must remain mindful of these concerns especially when altering the tone, themes, or cultural significance of the original texts in a way that could be perceived as misrepresentation.

### **CONTEMPORARY CHALLENGES AND INTERPRETIVE GAPS**

The advent of the digital age has revealed notable deficiencies in the Copyright Act's treatment of public domain materials. Originally drafted in a pre-internet era, the Act does not adequately account for modern technologies such as streaming services, artificial intelligence, and digital restoration, all of which now play a central role in content creation and dissemination<sup>10</sup>. Key

---

<sup>10</sup> Rudra Srivastava & Neha Meena, *AI and Indian Law: Addressing Privacy, Ethics, and Copyright Challenges in the Digital Age*, Singhania & Partners LLP (Feb. 6, 2025), <https://singhania.in/blog/ai-and-indian-law-addressing->

challenges include assessing the copyright status of digitally restored public domain films, determining the legal standing of AI-generated adaptations, and resolving cross-border enforcement issues where public domain status differs across jurisdictions.

The emergence of user-generated content platforms has further complicated the legal landscape. Public domain works are frequently remixed, altered, and circulated using technological methods not foreseen by the original legislation. The current framework offers limited guidance on the copyright implications of algorithm-driven reinterpretations or collaborative, crowd-sourced adaptations of classical works.

Moreover, the territorial scope of the Act poses significant hurdles in the context of global digital distribution. Works based on Indian public domain materials may still be subject to copyright restrictions in countries with extended protection terms, thereby creating legal uncertainty and commercial barriers for Indian filmmakers aiming to access international markets.

## **ENFORCEMENT AND PRACTICAL IMPLEMENTATION**

In practice, applying public domain principles within Indian cinema presents several enforcement challenges. A general lack of awareness among filmmakers and producers often leads to either excessive caution avoiding content that may actually be free to use or unintentional infringement due to insufficient legal scrutiny.

Filmmakers bear the responsibility of verifying whether a work has entered the public domain, which often involves analysing overlapping rights and navigating unclear ownership histories. This task is made harder by the lack of accessible records on copyright registration, renewals, and ownership transfers, making it difficult even for legal experts to confirm public domain status with certainty.

While courts have occasionally acknowledged these challenges and shown leniency when parties acted in good faith, the absence of centralized databases or clear official guidance continues to create ambiguity and risk for content creators.

Given the scale and complexity of film production in India, with numerous films drawing from cultural and historical sources each year, consistent monitoring and enforcement remain difficult. As a result, legal standards related to public domain use are often applied unevenly.

This environment calls for more clarity, awareness, and institutional support to balance the intended openness of public domain works with the legal and commercial demands of the film industry.

## **THE DISNEY STRATEGY**

The Walt Disney Company offers a fascinating example of how public domain stories can be transformed into powerful commercial assets. Over the years, Disney has turned timeless fairy tales such as *Cinderella*, *Beauty and the Beast*, and *The Little Mermaid* into cultural landmarks. More recently, the studio has breathed new life into these stories through live-action remakes of their own animated classics, combining nostalgia with fresh creative expression. Behind the magic lies a calculated legal and commercial strategy.

At the heart of this approach is a sharp distinction between public domain source material and original creative elements. Stories by Charles Perrault, the Brothers Grimm, and Hans Christian Andersen have long since entered the public domain, meaning anyone is free to adapt them. But Disney's specific versions featuring distinct character designs, iconic songs, signature dialogue, and visual storytelling are protected by copyright. So, while anyone can tell the tale of *Cinderella*, no one else can legally copy Disney's *Cinderella*.

When Disney revisits these classics with live-action films, it's not simply repeating old content, it's crafting new derivative works. Each remake introduces fresh creative layers: new scripts, updated visuals, reimagined soundtracks, and modern storytelling choices. These elements qualify for their own copyright protection, extending Disney's control over these stories for decades to come. It's a strategy that fuels new revenue through box office sales, merchandise, and streaming, while also reinforcing Disney's branding and trademark presence in the market.

The law supports this model. Public domain stories are open to all, but any original contribution no matter how subtle can be copyrighted. In film, even casting choices, set design, or the tone of a performance count as creative expression. A filmmaker who simply reproduces a public domain story without adding anything new gains no copyright and no legal protection. This is why studios

like Disney intentionally infuse their adaptations with distinctive features: to ensure their versions remain exclusive.

Through this method, Disney has built a vast intellectual property empire on the foundation of freely available stories. By continually reimagining these tales, the company maintains cultural dominance over narratives it doesn't legally own, turning public heritage into private assets. It's a vivid example of how law, creativity, and commerce intersect—where the public domain becomes a launching pad for exclusive, profitable storytelling in the modern entertainment industry.

### **CONTEMPORARY CHALLENGES AND FUTURE IMPLICATIONS**

The pace of technological change has reshaped how cinema interacts with intellectual property law, especially in the context of public domain works. In India, the Copyright Act of 1957 was never designed with streaming platforms, artificial intelligence, NFTs, or immersive experiences in mind. And yet, these are now the arenas where many classic stories are finding new life. Indian filmmakers often rely on literature, mythology, and folklore that are in the public domain, but as creative and commercial layers get added, the legal ground beneath these adaptations becomes increasingly unstable. From international streaming conflicts to questions about who owns AI-generated scripts, there is growing urgency to rethink what the public domain means in the modern age and how Indian cinema can continue to draw from it without falling into legal grey zones.

With Indian films now routinely premiering on global streaming platforms, conflicts around territorial copyright protection are becoming more frequent. A novel or poem may be in the public domain in India, but still under copyright in the U.S. or Europe. This means a filmmaker adapting an old Bengali classic for an Indian audience could suddenly face copyright strikes when the film hits Netflix or Prime Video abroad. Such conflicts not only discourage the use of public domain works but also force creators to spend heavily on international rights clearances. For stories that should, in theory, be “free for all,” the financial and legal burdens remain real—and growing.

Platforms like YouTube, which host large volumes of user-generated content, often use automated copyright detection tools that cannot tell the difference between a copyrighted work and a public domain one. As a result, users posting educational clips, fan edits, or mashups based on freely available public domain content may find their videos blocked or demonetised. In trying to avoid liability, platforms may over-police, erring on the side of takedowns rather than fair use. This

overreach affects not just casual users but also scholars, educators, and filmmakers who rely on public domain material to create culturally valuable commentary and content.

Artificial intelligence has added an entirely new dimension to the legal treatment of public domain works. When an AI system is trained on thousands of old texts and generates a new screenplay, who owns that screenplay? Under Indian law, there is currently no recognition of non-human authorship, which means that the creative output of AI floats in a legal vacuum. Things get even murkier when the AI mixes various versions of public domain material—like different translations or retellings of the Ramayana—to create something entirely new. Even if the base material is in the public domain, the way it is recombined might overlap with still-protected versions. The legal system has yet to catch up with these hybrid creations, leaving filmmakers unsure about how to proceed or protect such content.

There's a growing movement in India to digitally restore old films, especially those that are deteriorating or have slipped into obscurity. But once a public domain film is restored—color-corrected, cleaned up, with enhanced sound—can the restoration be copyrighted? The answer depends on how much creative input went into the process. If it's just mechanical cleaning, maybe not. But if there's artistic decision-making involved, then the restored version might qualify as a derivative work. This creates a strange situation where the old, damaged print is free for anyone to use, but the best-looking, restored version is under lock and key. With no clear law governing these scenarios in India, questions about access, ownership, and distribution remain unresolved.

The NFT boom has introduced new ways of monetising public domain stories but also new risks. When someone creates an NFT linked to a famous character from folklore, they may not own the character but can still profit by selling a digital “certificate” of that representation. This can mislead buyers into thinking they own exclusive rights to something that legally belongs to everyone. In Indian cinema, where characters from the Mahabharata or Panchatantra are frequently reimaged, the idea of someone turning such images into NFTs and claiming ownership raises ethical and legal concerns. It commercialises shared culture without always giving back to the community or heritage it came from.

Virtual reality and augmented reality are also transforming how public domain stories are experienced. In a VR setting, users don't just watch the story unfold they shape it. They can change the course of a mythological tale, step into the shoes of a character, or even redesign the plot. These

interactive elements mean that every user's experience can be slightly different, and the final story might be co-created by the platform, the developer, and the user. But who owns that version of the story? Does the user have any rights to the experience they helped shape? The law in India doesn't currently have a framework for this kind of co-authored, dynamic storytelling, which opens the door to disputes about rights and revenue.

Given these fast-moving developments, it's clear that Indian copyright law needs urgent reform. The Copyright Act must be updated to define how AI-generated content can be owned, whether restored public domain films qualify for new protection, and how NFTs and immersive media fit into the larger picture. There should also be a push for international cooperation, so that creators don't run into legal roadblocks when their work crosses borders. Judges and regulators need training in digital technology to keep up with the cases they'll increasingly be asked to handle. A public domain registry, maintained by the government or an independent body, could help clarify what is truly free to use, reducing the current confusion. Most importantly, reforms must keep access and equity in mind—ensuring that the digital transformation of Indian cinema doesn't lock away cultural heritage behind new forms of commercial control.

For generations, Indian filmmakers have drawn on stories from epics, legends, and classic literature to fuel their creative visions. These works, now in the public domain, should serve as a wellspring of shared cultural imagination. But in today's tech-driven world, they're becoming harder to navigate. Whether it's due to cross-border copyright clashes, automated takedowns, AI ambiguities, or digital commodification, the public domain is no longer the safe, open space it once was. Without legal reform, Indian cinema risks losing its ability to freely reinterpret its own heritage. To keep storytelling vibrant, accessible, and innovative, the law must evolve alongside the technology reshaping how stories are told.

## **REFORMS**

India needs a centralized Public Domain Registry, similar to creative commons databases, that provides definitive guidance on copyright status. This digital platform should offer searchable databases of public domain works, clear usage guidelines, and regular updates reflecting changes in copyright status. The proposed registry would eliminate the current burden on individual creators to conduct complex legal research and reduce litigation arising from good-faith mistakes about copyright status.

The establishment of specialized IP courts<sup>11</sup> with dedicated expertise in entertainment law would significantly improve consistency in judicial interpretation. These courts should include technical advisors familiar with digital technologies, ensuring that legal decisions reflect both jurisprudential principles and technological realities.

Professional organizations should develop industry-wide best practices for public domain usage, including standardized due diligence procedures, attribution guidelines, and cross-border licensing protocols. These standards would create predictable frameworks that reduce legal uncertainty while promoting responsible usage of cultural heritage materials.

Educational initiatives targeting filmmakers, legal professionals, and digital platform operators are essential. Regular workshops, certification programs, and accessible legal guidance would improve industry-wide compliance and reduce inadvertent violations. The proposed education programs should emphasize practical problem-solving rather than abstract legal theory.

India should actively engage in international copyright harmonization efforts while protecting its unique cultural interests. Bilateral agreements with major entertainment markets could establish reciprocal recognition of public domain determinations, reducing the territorial fragmentation that currently complicates global distribution of Indian films incorporating public domain materials.

The development of international best practices for handling public domain materials in digital distribution would benefit all stakeholders. India's leadership in this area, given its robust film industry and rich public domain heritage, could position the country as a thought leader in balancing cultural preservation with commercial innovation.

## **CONCLUSION**

The legal challenges surrounding public domain usage in modern Indian cinema reflect broader tensions between traditional copyright frameworks and rapidly evolving creative technologies. The current legal vacuum creates unnecessary barriers to legitimate creative expression while failing to address genuine concerns about cultural appropriation and creator rights.

---

<sup>11</sup> Abhai Pandey, *An Initiative for Specialized IP Courts*, Lexology (July 16, 2021), <https://www.lexology.com/library/detail.aspx?g=28bdfb8b-04f0-4807-ae60-9390716b8a7b> (last visited July 19, 2025).

However, these challenges also present unprecedented opportunities. By modernizing its legal framework proactively, India can establish itself as a global leader in balancing cultural heritage preservation with technological innovation. The proposed reforms would not only benefit the domestic film industry but also serve as a model for other developing nations facing similar challenges.

The path forward requires recognition that public domain materials are not merely free resources to be exploited, but shared cultural heritage that demands thoughtful stewardship. Legal frameworks should encourage creative reinterpretation while respecting the cultural significance and moral rights associated with these works.

Success depends on collaborative efforts between lawmakers, judges, industry professionals, and technology developers. The goal is not to restrict innovation but to create legal certainty that enables creators to confidently build upon cultural foundations while contributing new creative expressions for future generations.

The transformation of Indian cinema's relationship with public domain materials represents more than legal reform it embodies the nation's approach to balancing tradition with progress, heritage with innovation, and cultural preservation with commercial opportunity. The decisions made today will determine whether India's rich cultural legacy continues to inspire new generations of filmmakers or becomes trapped in legal uncertainty that stifles creative expression.

Ultimately, effective legal frameworks should serve creativity, not constrain it. By addressing current gaps and preparing for emerging challenges, India can ensure that public domain materials continue fulfilling their fundamental purpose: serving as the foundation upon which new cultural expressions are built, connecting past wisdom with future innovation in the dynamic landscape of modern Indian cinema.