



2026:DHC:2786



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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**
+ W.P.(C) 4143/2026 and CM APPL. 20244/2026, CM APPL. 20245/2026

Date of Decision: **30.03.2026****IN THE MATTER OF:**

RAJASTHAN HOCKEY ASSOCIATION

.....Petitioner

Through: Mr. Yash Chaturvedi, Mr. Himanshu
Sihag, Mr. Aman Maheshwari,
Advocates.

versus

UNION OF INDIA & ORS.

.....Respondents

Through: Mr. Rohan Poddar, Advocate for
Respondent Nos. 2 and 3.

CORAM:**HON'BLE MR. JUSTICE PURUSHAINDRA KUMAR KAURAV****J U D G E M E N T****PURUSHAINDRA KUMAR KAURAV, J. (ORAL)**

1. The petition is for the following relief:

“(a) Issue an appropriate writ, order or direction in the nature of Mandamus, directing the Respondents No. 2 & 3, to refrain from using the word ‘Rajasthan’ or any other similar word depicting the State of Rajasthan while naming/describing any participant Organisation/ Association/Society or any other such body, other than the Petitioner herein, in all the forthcoming national and other competitive hockey tournaments;”

2. The petition is for directions to respondents no. 2 and 3 to refrain

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from using the word ‘Rajasthan’ or any similar word depicting the State of Rajasthan while describing any participant Organisation other than the petitioner- Rajasthan Hockey Association, in all national and other competitive hockey tournaments. The Petitioner claims to be legally recognized federation for the sport of hockey in Rajasthan.

3. It is the petitioner’s case that an official communication dated 25.02.2026 has been addressed to Hockey India by the Rajasthan State Sports Council. The petitioner relies on Section 25 of the Rajasthan Sports (Registration and Recognition of Associations) Act, 2005 (hereinafter ‘the Act of 2005’), and contends that this provision prohibits entities from using ‘Rajasthan’ as a part of its name unless it is a registered State level Sports Association under the Act of 2005.

4. A perusal of Annexure P-11 would indicate that the High Court of Judicature for Rajasthan (hereinafter ‘the Rajasthan High Court’) at Jodhpur in S.B. Civil Writ Petition No. 6127/2026, at the instance of some petitioners directed that the Rajasthan Hockey Association, who was respondent no.5 therein, and the players affiliated with it be permitted to participate in the National Level Hockey Tournament. It was further directed that the Hockey India shall also display the name of the Rajasthan Hockey Association on its official Player Registration Portal.

5. On perusal of the facts and circumstances, the Court finds that the issue pending in the Rajasthan High Court is intrinsically related with the issue which is sought to be agitated in the instant writ petition.

6. Merely, some fixtures are being released from Delhi should not be the sole reason to entertain the instant writ petition by this Court. The cause of action essentially has arisen within the State of Rajasthan as to which the



Organization/ Sport body should represent the State of Rajasthan.

7. All the aforesaid aspects can be looked into by the concerned jurisdictional High Court.

8. The Supreme Court in the case of *Kusum Ingots & Alloys Ltd. v. Union of India and Anr.*,¹, in paragraph no. 30, has held as under:

“Forum conveniens

30. We must, however, remind ourselves that even if a small part of cause of action arises within the territorial jurisdiction of the High Court, the same by itself may not be considered to be a determinative factor compelling the High Court to decide the matter on merit. In appropriate cases, the Court may refuse to exercise its discretionary jurisdiction by invoking the doctrine of forum conveniens. [See Bhagat Singh Bugga v. Dewan Jagbir Sawhney [AIR 1941 Cal 670 : ILR (1941) 1 Cal 490] , Madanlal Jalan v. Madanlal [(1945) 49 CWN 357 : AIR 1949 Cal 495] , Bharat Coking Coal Ltd. v. Jharia Talkies & Cold Storage (P) Ltd. [1997 CWN 122] , S.S. Jain & Co. v. Union of India [(1994) 1 CHN 445] and New Horizons Ltd. v. Union of India [AIR 1994 Del 126] .]”

9. In view of the aforesaid and applying the principle of *forum conveniens* as the material, integral and essential part of the cause of action has arisen outside the jurisdiction of this Court, the petition, along with pending application, stands dismissed.

10. However, liberty is reserved in favour of the petitioner to approach the jurisdictional High Court.

PURUSHAINDRA KUMAR KAURAV, J

MARCH 30, 2026

aks.

¹ (2004) 6 SCC 254.