



2026:DHC:3812



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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**
+ **W.P.(C) 5026/2026 and CM APPL. 24748-24749/2026**

Date of decision: **16.04.2026****IN THE MATTER OF:****VOLLEYBALL ASSOCIATION OF KARNATAKAPetitioner**

Through: Mr. Siddharth Nayak, Advocate.
versus

UNION OF INDIA**.....Respondent**

Through: Mr Udit Dedhiya SPC with
Ms.Apurva Sachdev and Mr.
Preyansh Gupta, Advocates.

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

1. The instant petition is for the following reliefs:-

“a) Issue a writ of mandamus or any other appropriate writ, order or direction, directing the MYAS to direct the Volleyball Federation of India not to permit or allow the Karnataka Volleyball Association to send teams to participate in the forthcoming National Volleyball Championships for all categories, as the said association is not a duly constituted or legally compliant State association.

b) Issue a writ of mandamus or any other appropriate writ, order or direction, directing the Volleyball Federation of India to recognize and permit the Volleyball Association of Karnataka, headed by Shri J. Arun Chakravarthy, IPS as President and Shri K. R. Lakshminarayana as General Secretary, being the association duly affiliated to the Karnataka Olympic Association and recognized by the Department of Youth Empowerment and Sports, Government of Karnataka, to conduct selection trials and send teams representing the State of Karnataka for the National Volleyball Championships for all categories.

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c) Declare that the Karnataka Volleyball Association is not a legally compliant or duly constituted State association, having failed to conduct elections, maintain statutory compliance, and comply with the governance requirements prescribed under the National Sports Development Code of India, 2011, the National Sports Governance Act, 2025, and the directions issued by the Department of Youth Empowerment and Sports, Government of Karnataka.

d) Direct the Volleyball Federation of India to update its official records in accordance with the communication issued by the Karnataka Olympic Association dated 08.12.2025, recognizing the Petitioner Association as the sole affiliated and recognized State association for the sport of volleyball in Karnataka.

e) Pass such other order or orders as this Hon'ble Court may deem fit and proper in the interest of justice and equity, including costs of the present proceedings.”

2. The petitioner-Volleyball Association of Karnataka claims to be an organisation duly affiliated with the Government of Karnataka and the Karnataka Olympic Association. Respondent no. 2-Volleyball Federation of India, is the National Sports Federation for the sport of volleyball. Respondent no. 3-Karnataka Volleyball Association previously functioned as the State-level unit affiliated to respondent no. 2. According to the petitioner, respondent no. 3 has ceased to function lawfully and is ineligible to be affiliated to respondent no. 2-federation.

3. The petitioner's grievance is with respect to the continued recognition of respondent no. 3 by respondent no. 2-federation. According to the petitioner, it is duly recognised as the state-level body by the concerned authorities at the Government of Karnataka and the Karnataka Olympic Association, and therefore, respondent no. 2-federation ought to grant recognition to it.

4. It is seen that the entire dispute pertains to the petitioner's alleged

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right to be represent the State of Karnataka in the respondent no. 2-federation. As such, the principal, material, and essential part of the cause of action has arisen outside the jurisdiction of this Court.

5. Learned counsel for the petitioner submits that there are pending petitions before this Court relating to the affairs of respondent no. 2-federation, and therefore, the Court ought to entertain even this petition. However, the Court is of the opinion, that the same cannot be a determinative factor in determining the question of jurisdiction.

6. This Court, *The Indure Pvt. Ltd. v. Government of NCT of Delhi*,¹ considered whether the passing of the impugned order by an authority which is situated in Delhi would mean the essential part of the cause of action to have arisen in Delhi. The Court answered the said question in the negative, and held as under:

“36. A petitioner who approaches this Court to assail a decision of an authority situated in Delhi, when the underlying cause for the said decision lies elsewhere, effectively attempts to make this High Court a mini-pan-India Superior Court exercising jurisdiction over all events which take place throughout this Country. There is no gainsaying with the proposition that every High Court is competent to adjudicate upon a lis which arises from events or actions taking place within its territory. Merely because the ultimate order, which is based on events taking place outside Delhi and takes cognizance of actions outside of Delhi, is passed within the jurisdiction of this Court, a writ petition ought not be entertained by this Court.

37. Naturally, being the capital of the Country, various authorities and bodies having pan-India jurisdiction would be located within the jurisdiction of this Court. Merely because the decision making authority happens to be in Delhi, ought not to be the sole reason to entertain a lis in this Court. The decision, no doubt, may be passed in the national capital, but it is usually against persons situated outside Delhi; and even

¹ 2026:DHC:1605



more importantly, for actions which took place beyond the borders of this Court. The act of giving a hearing in Delhi, or the passing of an order in Delhi, is merely a result of a body/authority being situated in the national capital, it has nothing to do with the lis, the offending action, the legal injury or the foundational facts on the basis of which action is being taken.

38. The case-law cited above, makes repeated reference to “dominant facts”, and facts which are “material, essential and integral” to the lis in question. In most cases, the fact that the order is passed, or the head office is located, or that opportunity of hearing was afforded, within the jurisdiction of this Court is completely immaterial, non-essential, and non-integral to the dispute in question. Any of the aforementioned three aspects could very well have taken place in another part of the Country, it is for the sole reason that Delhi is the national capital, that, in most cases these factors get connected to the jurisdiction of this Court. From another lens, it may be seen that regardless of what the underlying facts or legal injury/infringement may be, the order impugned would, in an overwhelming number of cases be passed from Delhi. If this be the case, can this constant factum, which shall remain present in each case, be considered a “dominant fact” or a “material, essential and integral” fact? The answer must be in the negative.

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42. It is the substance of the matter which the Court must consider in determining the connection with Delhi. An order being passed by an authority in Delhi is an unchanging constant. This static/uniform facet, which is unmoved by the nature of the lis, ought not to determine where territorial jurisdiction would lie.””

7. Further, the Supreme Court, in its decision in ***Kusum Ingots & Alloys Ltd. v. Union of India and Anr.***,² has held that in cases where the cause of action has arisen within the jurisdiction of multiple High Courts, the Courts within whose jurisdiction only a part of the cause of action has arisen, may exercise its discretion and refuse to entertain the petition. The Court held that the determinative factor for determining the jurisdictional High Court would be where the material, essential, and substantial part of the cause of action has arisen. The relevant portion of the decision is extracted below, for reference:





“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.”

8. This Court was faced with a similar dispute in ***Rajasthan State Table Tennis Association v. Table Tennis federation of India and Ors.***³ wherein similar relief was sought by Rajasthan State Table Tennis Federation, examined the aforesaid decisions and has held that in disputes pertaining to right of sports-organisations to represent a State, the material part of the cause of action would arise in the respective States and refused to entertain the dispute.

9. In view of the aforesaid, the Court declines to entertain the instant writ petition. The same is accordingly dismissed.

10. Liberty is, however, granted to the petitioner to approach the Court of competent jurisdiction, if so advised.

11. All rights and contentions of the parties are left open.

(PURUSHAINDRA KUMAR KAURAV)
JUDGE

APRIL 16, 2026
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² (2004) 6 SCC 254

³ 2026:DHC:2214

