



2026:DHC:3811



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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**
+ **W.P.(C) 17198/2025 and CM APPL. 70744/2025**

Date of decision: **16.04.2026****IN THE MATTER OF:**

TAMIL NADU JUDO ASSOCIATION & ANR.Petitioners

Through: Mr. Paresh B Lal, Advocate.

versus

JUDO FEDERATION OF INDIA & ORS.Respondents

Through: Mr. Bharat Gupta and Mr. Amit Gupta, Advocates for R-1.
Mr. Rajeev Kawatra & Ms. Shalaka Garg, Advocates for R-2 and 3.
Mr. Ruchir Mishra, Mr. Sanjiv Kr Saxena, Mr. Mukesh Kr Tiwari, Ms. Reba Jena Mishra, Ms. Poonam Shukla Advocates for R-UOI..

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. That this Hon’ble Court may be pleased to issue a writ of mandamus or pass directions to set up and direct an independent committee to adjudicate the dispute as to rightful representative judo association for the State of Tamil Nadu and the rightful member constituent of Respondent No. 1.

Signature Not Verified

Signed By: AMIT KUMAR
SHARMA
Signing Date: 05.05.2026
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Signature Not Verified

Signed
By: PURUSHAINDRA
KUMAR KAURAV





b. That, pending the completion of the enquiry prayed for above, this Hon'ble Court may set aside the recognition, affiliation and membership granted to Respondent No. 2 by Respondent No. 1 and refrain any of the members, functionaries, agents and representatives of Respondent No. 2 from being included and or participating in any activity organized by or under the aegis of Respondent No. 1.

c. Pass any other order that this Hon'ble Court may deem fit in the interest of justice."

2. Petitioner no. 1-Tamil Nadu Judo Association, is an organisation claiming to be the legitimate State-level governing body for Judo in the State of Tamil Nadu. Respondent no. 1-Judo federation of India is the duly recognised National Sports Federation for the sport. Respondent no. 2 is also an organisation named 'Tamil Nadu Judo Association' and has been recognised as the official State level-Association by respondent no. 1 since the year 2021. The petitioners claim to have filed multiple representations before respondent no. 1 against the recognition granted to respondent no. 2. However, since the said representations were not being considered by the concerned authorities, the instant petition has been filed.

3. At the outset, the Court noted that the primary prayer in this petition is with respect to determination of which organisation is the rightful representative of the State of Tamil Nadu for the sport of Judo. This Court, in ***Rajasthan State Table Tennis Association v. Table Tennis federation of India and Ors.***,¹ wherein similar relief was sought by Rajasthan State table Tennis Federation, 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.

¹ 2026:DHC:2214



2026:DHC:3811



4. In paragraph 11 of the petition, the following reasons have been stated for invocation of the jurisdiction of this Court:

“That Respondent No. 1 against whom the directions are sought in the Writ Petition has its place of business /function at New Delhi, which is under the territorial jurisdiction of this Hon’ble Court. Further, this Hon’ble Court is seized of the writ petition whereby the Administrator was appointed to manage the affairs of Respondent No. 1. Therefore, this Hon’ble Court has jurisdiction to entertain the present Writ Petition.”

5. Learned counsel for the petitioners submits that the impugned action herein is the recognition granted by respondent no. 1 to respondent no. 2. According to him, the registered office of respondent no. 1 is situated within the jurisdiction of the Court and the decision to recognise respondent no. 2 as the State-level authority for judo has been taken herefrom. Therefore, he submits, the entire cause of action for the present *lis* arose at the registered office of respondent no. 1, within the territorial jurisdiction of this Court.

6. He further submits that, earlier, this Court in ***Haryana State Judo Association v. Judo Federation of India and Ors.***,² had appointed an administrator for respondent no. 1-federation, and had directed him to review the status of membership of all its constituents. He submits that the petitioners’ grievance is with respect to non-compliance with the said direction.

7. However, the Court finds that the petitioner has failed to establish that the material part of the cause of action did, in fact, arise within the jurisdiction of the Court. This Court, ***The Indure Pvt. Ltd. v. Government of***

² Order dated 02.06.2022



NCT of Delhi,³ 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 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

³ 2026:DHC:1605





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.”

8. Further, the Supreme Court, in its decision in ***Kusum Ingots & Alloys Ltd. v. Union of India and Anr.***,⁴ 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.”

9. This Court, in ***Rajasthan Table Tennis Association***, had considered similar submissions, and upon a conspectus of the aforesaid decisions, relegated the parties to the jurisdictional High Court.

10. In view of the aforesaid, the Court declines to entertain the instant





2026:DHC:3811



writ petition. The same is accordingly dismissed with liberty to the petitioner to approach the jurisdictional Court.

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

(PURUSHAINDRA KUMAR KAURAV)
JUDGE

APRIL 16, 2026
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⁴ (2004) 6 SCC 254