



\$~85

* **IN THE HIGH COURT OF DELHI AT NEW DELHI**
+ **W.P.(C) 2185/2026 and CM APPL. 10581-10582/2026**

Date of decision: **12.03.2026**

IN THE MATTER OF:

RAJASTHAN TABLE TENNIS ASSOCIATION

.....PETITIONER

(Through: Mr. Deepak Biswas, Mr. Siddharth Swain, Mr. Mayank Rai, Advocates.)

versus

TABLE TENNIS FEDERATION OF INDIA AND ORS

.....RESPONDENTS

(Through: Mr Sunil Dalal Sr Advocate Along with Mr.Dhruv Sheoran, Mr.Rajiv Singh , Mr.Ankit Rana , Ms.Shipra Bali, Mr.Sarthak Malhotra adn Mr. Anirudh Singh., Advocates for R-1. Mr. Aman maheshwari, Mr. Yash Chaturvedi, Mr. Saurabh Oberoi, Advocates for R-2 and 3.

Mr. Chetan Sharma, ASG, with Mr. Udit Dedhiya SPC, Harshvardhan Jha GP Ms Apurva Sachdev Adv Mr Preyansh Gupta adv Mr. Amit Gupta, Mr. R. V. Prabhat Shubham Sharma and Mr. Yash Wardhan Sharma, Mr. Naman, Advocates for R-4. Mr. Harshvardhan Jha G.P., Advocate for Respondent No.4.)

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 certiorari or any- other appropriate writ, order or direction in the nature thereof setting aside and quashing the Impugned



Orders dated-28.01.2026 passed by the EC of Respondent No;- 1 and ratified in the AGM of the same date;

B. Issue a writ of mandamus and/or any other appropriate writ, order or direction in the nature thereof directing Respondent No. 1 to restore status quo ante as it existed prior to the passing of the Impugned Orders and to withdraw and retract the recognition and affiliation granted to RSTTA and RTTA-1 i.e., the faction led by Respondent Nos. 2 & 3;

C. Issue a writ of certiorari and/or mandamus or -any other appropriate writ, order or direction in the nature thereof directing Respondent No. 1 to maintain neutrality and to refrain from taking any coercive, administrative or consequential action in relation to the inter se disputes between the rival factions of RSTTA, including matters of recognition, affiliation and representation, during the pendency of proceedings before the Hon'ble High Court of Rajasthan and until final adjudication thereof by the competent judicial forum.”

2. The facts of the case would indicate that on 11.02.2023, the elections of Rajasthan State Table Tennis Association (“**RSTTA**”) were conducted at Jodhpur, pursuant to which respondent nos. 2 and 3 were allegedly elected as Secretary General and President respectively. On 17.02.2023, the District Sports Officer, Jodhpur issued certificate recognizing respondent nos. 2 and 3 as office-bearers and on 20.03.2023, Rajasthan Olympic Association issued a certificate recognizing respondent nos.2 and 3 as office bearers.

3. Thereafter, the stakeholders, including, district associations, players and officials, challenged the validity and legality of the elections and submitted representation to State authorities. The said challenge led to the formation of two factions within the RSTTA i.e.—first faction being led by respondent nos. 2 and 3 (referred to as “**RTTA-1**”) and the second faction led by Mr.Ranjit Malick and Mr. Mahendra Singh Umat (referred to as “**RTTA-2**”).



4. Respondent no.1 allowed the players from both factions to participate in the national championship without granting exclusive recognition.
5. The Registrar, Co-operative Society has rejected the complaint filed by Mr. Ranjit Malick on 23.02.2024. Thereafter, on 31.05.2024, respondent no.1 appointed an Enquiry Committee to investigate the disputes between rival factions and the said Committee has submitted its report recommending recognition of RTTA-1 faction led by respondent nos. 2 and 3 on 05.07.2024. The facts would further indicate that the Department of Sports and Youth Affairs rejected the appeal filed by Mr. Malick impugning the order dated 23.02.2024 passed by the Registrar, Co-operative Society.
6. Thereafter, the order dated 28.10.2024 was assailed before the High Court of Rajasthan in S.B. Civil Revision Petition No. 368 of 2024, pursuant to which the Court remanded the issue concerning the validity of the RSTTA elections to the Department of Sports and Youth Affairs for fresh consideration. On 02.06.2025, Rajasthan State Sports Council convened a meeting of rival factions, stakeholders and parents and the said Council has issued a communication dated 16.06.2025 seeking initiation of dissolution and constitution of ad-hoc committee to oversee affairs of RSTTA. Respondent no.2 on behalf of RTTA-1 faction, had challenged the said communication dated 16.06.2025 before the High Court of Rajasthan at Jaipur (S.B. Civil W.P. No.9899/2025), whereby, the directions dated 16.06.2025 were stayed.
7. On 28.01.2026, the Executive Committee of respondent no.1 passed the impugned order *vide* which the respondent no.1 has proceeded to accord



recognition to the RTTA-1. According to the petitioner, it first became aware of the impugned recognition order on 05.02.2026. The minutes of AGM meeting dated 28.01.2026 were circulated, confirming post facto approval of the impugned decision on 09.02.2026. Hence, the petitioner has filed the instant writ petition.

8. Mr. Deepak Biswas, learned counsel for the petitioner while making submissions to invoke the jurisdiction of this Court, points out that the effect of the impugned decision is all over the country and the decision itself has been taken in Delhi, therefore, the petitioner has a right to approach this Court. He also submits that the dispute which is pending before the High Court of Judicature for Rajasthan relates to the factions of the respondent no.1. However, in the instant case, the petitioner's entitlement has been wrongly denied by respondent no.1.

9. Mr. Sunil Dalal, learned senior counsel for respondent no.1 points out from Annexure P-11 that a writ petition between two fractions of Rajasthan Table Tennis Association is pending for consideration before the High Court of Judicature for Rajasthan, Bench at Jaipur. He submits that the petitioner belongs to the State of Rajasthan and is seeking directions to represent the said State in all State and National Sports events. According to him, the entire effect of the decision has been predominantly felt at the State of Rajasthan.

10. It appears that the sole reason to invoke the jurisdiction of this Court seems to be that respondent no. 1 is situated within the jurisdiction of this Court, and naturally, therefore, the impugned order also has been passed in



Delhi.

11. This Court in *The Indure Pvt. Ltd. v. Government of NCT of Delhi*,¹ took note of the decisions in *Shristi Udaipur Hotels v. Housing and Urban Development Corp.*,² *Riddhima Singh v. Central Board of Secondary Education*,³ *Smt. Manjira Devi Ayurveda Medical College and Hospital v. Uttarakhand University of Ayurveda and Ors.*,⁴ *Michael Builders and Developers Pvt. Ltd. v. National Medical Commission and Ors.*,⁵ which declare that the situs of the head office/registered office of the respondent, does not determine whether the Court has the requisite territorial jurisdiction to entertain a writ petition.

12. The Court in *The Indure Pvt. Ltd.* importantly noted, at para. 36:

“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.”

13. On the issue of a claimant approaching this Court on the sole-ground of the respondent-authority, an arm of the union government, being situated within the jurisdiction of this Court, it was observed at para. 37-38:

¹ 2026:DHC:1605.

² 2014 SCC OnLine Del 2892.

³ 2023 SCC OnLine Del 7168.

⁴ 2024:DHC:6903-DB



“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 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.”

14. Ultimately, the Court concluded that the substance of a matter must be adjudged, and not the unchanging constant which is present in every petition against a State-authority, to arrive at a conclusion on whether to entertain a petition in the context of territorial jurisdiction and *forum non conveniens*.

At para. 42 this Court observed:

“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.”

⁵ 2024:DHC:7146.



15. It be, thus, noted that the petitioner admittedly, belongs to the State of Rajasthan and seeks to represent the said State in all State and National Sports events. A perusal of the factual narration contained in para 2-7 of this Order would reveal that the material, essential and integral cause of action has arisen within the State of Rajasthan. In the facts of the instant case, there may, arguably, be a part of cause of action which has arisen in Delhi, however, the same should not be the sole reason to entertain the instant petition.

16. The Supreme Court in the case of *Kusum Ingots & Alloys Ltd. v. Union of India and Anr.*,⁶ has held 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*. The material portion of the aforementioned decision reads 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

⁶ (2004) 6 SCC 254.



2026:DHC:2214



India [AIR 1994 Del 126] .]”

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

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

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

(PURUSHAINDR KUMAR KAURAV)
JUDGE

MARCH 12, 2026

Nc