

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Miriam Maldonado v. Aoki Lawnmower Shop, Inc., et al.

Maldonado · No. 2:25-cv-10074; CV 25-10074-MWF(Ex) · Decided October 31, 2025

SUMMARY

The court orders the plaintiff to show cause why it should exercise supplemental jurisdiction over claims under California's Unruh Civil Rights Act and other state laws. The order cites 28 U.S.C. § 1367(c) and *Arroyo v. Rosas* regarding federal-state comity concerns arising from ADA-based Unruh Act claims. The plaintiff must provide the amount of statutory damages sought and facts concerning whether the plaintiff or counsel is a high-frequency litigant, with a response due November 14, 2025.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Michael W. Fitzgerald
JURISDICTION	United States District Court, Central District of California
DECIDED	October 31, 2025
DOCKET	2:25-cv-10074; CV 25-10074-MWF(Ex)
DISPOSITION	other
PROCEDURAL POSTURE	The district court issued an order to show cause concerning whether it should exercise supplemental jurisdiction over the plaintiff's Unruh Civil Rights Act and other state-law claims.
STANDARD OF REVIEW	The court independently reviews and confirms its subject-matter jurisdiction, including sua sponte during the pendency of the action.
PRECEDENTIAL VALUE	Unknown; district court order to show cause

TOPICS

- subject matter jurisdiction
- civil procedure
- ada / disability
- public accommodations discrimination
- federalism

PRACTICE AREAS

- civil procedure
- disability rights
- supplemental jurisdiction

QUESTIONS PRESENTED

1. Whether the district court should exercise supplemental jurisdiction over the Unruh Civil Rights Act claim and other state-law claims.
2. Whether Plaintiff must provide information concerning the statutory damages sought and potential high-frequency-litigant status to assist the court's jurisdictional determination.

HOLDINGS

1. The district court may raise and examine the question of subject-matter jurisdiction sua sponte at any time during the pendency of the action.

KEY QUOTATIONS

“This Court has a sua sponte obligation to confirm that it has subject matter jurisdiction.”

“Failure to timely or adequately respond to this Order to Show Cause may, without further warning, result in the dismissal of the entire action without prejudice or the Court’s declining to exercise supplemental jurisdiction over the Unruh Act claim and the dismissal of that claim pursuant to 28 U.S.C. § 1367(c).”

FACTUAL BACKGROUND

The complaint alleges a violation of the Americans with Disabilities Act and asserts related claims under California's Unruh Civil Rights Act and other state law. The Unruh Act claim rests solely on supplemental jurisdiction, and the court sought information about the amount of statutory damages and whether Plaintiff or counsel qualifies as a high-frequency litigant under California law.

PROCEDURAL HISTORY

Plaintiff filed a complaint asserting an ADA claim for injunctive relief, an Unruh Civil Rights Act claim for damages, and other state-law claims. The district court, acting sua sponte, ordered Plaintiff to explain why supplemental jurisdiction should be exercised and directed Plaintiff to provide information concerning statutory damages and possible high-frequency-litigant status by November 14, 2025.

DISPOSITION

other

CASES CITED

- Arroyo v. Rosas, 19 F.4th 1202, 1211–14 (9th Cir. 2021)
- Nevada v. Bank of Am. Corp., 672 F.3d 661, 673 (9th Cir. 2012)
- Snell v. Cleveland, Inc., 316 F.3d 822, 826 (9th Cir. 2003)