

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Luz Zendejas v. EPSC Business, Inc., et al.

Zendejas · No. CV 25-6399 PA (MARx) · Decided July 18, 2025

SUMMARY

The Central District of California issued an order to show cause concerning plaintiff's ADA and California Unruh Civil Rights Act claims. The court directed plaintiff to explain why supplemental jurisdiction should be exercised over the state-law claims, identify the statutory damages sought, and provide declarations addressing whether plaintiff and counsel qualify as high-frequency litigants under California law.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Percy Anderson
JURISDICTION	United States District Court for the Central District of California
DECIDED	July 18, 2025
DOCKET	CV 25-6399 PA (MARx)
DISPOSITION	other
PROCEDURAL POSTURE	The district court issued an in-chambers order requiring the plaintiff to show cause why the court should exercise supplemental jurisdiction over state-law claims accompanying an ADA claim.
PRECEDENTIAL VALUE	Unpublished, nonprecedential district-court order

TOPICS

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

PRACTICE AREAS

- Federal civil procedure
- Americans with Disabilities Act
- Supplemental jurisdiction
- California Unruh Civil Rights Act

QUESTIONS PRESENTED

1. Whether the court should exercise supplemental jurisdiction over the Unruh Civil Rights Act claim and any other state-law claims.
2. What information plaintiff and counsel must provide so the court can evaluate supplemental jurisdiction and compliance with California's high-frequency-litigant provisions.

HOLDINGS

1. When a complaint includes state-law claims over which the federal court appears to possess only supplemental jurisdiction, the court may require the plaintiff to show cause why it should exercise that jurisdiction and may decline jurisdiction under 28 U.S.C. § 1367(c).

KEY QUOTATIONS

“The supplemental jurisdiction statute “reflects the understanding that, when deciding whether to exercise supplemental jurisdiction, ‘a federal court should consider and weigh in each case, and at every stage of the litigation, the values of judicial economy, convenience, fairness, and comity.’””

FACTUAL BACKGROUND

The complaint alleges a violation of the Americans with Disabilities Act and seeks injunctive relief. It also seeks damages under California's Unruh Civil Rights Act and may assert other state-law claims. The court required information concerning the amount of statutory damages and whether plaintiff and counsel meet California's definition of high-frequency litigant.

PROCEDURAL HISTORY

Plaintiff filed a complaint asserting an ADA claim for injunctive relief and a California Unruh Civil Rights Act claim for damages. The court determined that it appeared to possess only supplemental jurisdiction over the Unruh Act and any other state-law claims, and ordered plaintiff to respond by August 1, 2025. The order warned that failure to respond adequately could result in dismissal without prejudice or dismissal of the state-law claims under 28 U.S.C. § 1367(c).

DISPOSITION

other

CASES CITED

- City of Chicago v. International College of Surgeons, 522 U.S. 156, 173, 118 S. Ct. 523, 534, 139 L. Ed. 2d 525 (1997)
- Carnegie-Mellon University v. Cohill, 484 U.S. 343, 350, 108 S. Ct. 614, 619, 98 L. Ed. 2d 720 (1988)

OPINION

CENTRAL DISTRICT OF CALIFORNIA CIVIL MINUTES - GENERAL Case No. CV 25-6399
PA (MARx) Date July 18, 2025 Title Luz Zendejas v. EPSC Business, Inc., et al. Present: The

Honorable PERCY ANDERSON, UNITED STATES DISTRICT JUDGE Kamilla Sali-Suleyman
Not Reported Deputy Clerk Court Reporter / Recorder Attorneys Present for Plaintiffs: Attorneys
Present for Defendants: None None Proceedings: IN CHAMBERS — ORDER TO SHOW
CAUSE The Complaint filed in this action asserts a claim for injunctive relief arising out of an
alleged violation of the Americans with Disabilities Act (“ADA”), 42 U.S.C. §§ 12010-12213, and
a claim for damages pursuant to California’s Unruh Civil Rights Act (“Unruh Act”), Cal. Civ.

Code §§ 51-53. It appears that the Court possesses only supplemental jurisdiction over the Unruh
Act claim, and any other state law claim that plaintiff may have alleged, pursuant to the Court’s
supplemental jurisdiction. See 28 U.S.C. § 1367(a).

The supplemental jurisdiction statute “reflects the understanding that, when deciding whether to
exercise supplemental jurisdiction, ‘a federal court should consider and weigh in each case, and at
every stage of the litigation, the values of judicial economy, convenience, fairness, and comity.’”
City of Chicago v. Int’l Coll. of Surgeons, 522 U.S. 156, 173, 118 S. Ct.

523, 534, 139 L. Ed. 2d 525 (1997) (emphasis added) (quoting *Carnegie-Mellon Univ. v. Cohill*,
484 U.S. 343, 350, 108 S. Ct. 614, 619, 98 L. Ed. 2d 720 (1988)). The Court therefore orders
plaintiff to show cause in writing why the Court should exercise supplemental jurisdiction over the
Unruh Act claim and any other state law claim asserted in the Complaint.

See 28 U.S.C. § 1367(c). In responding to this Order to Show Cause, plaintiff shall identify the
amount of statutory damages plaintiff seeks to recover. Plaintiff and plaintiff’s counsel shall also
support their responses to the Order to Show Cause with declarations, signed under penalty of
perjury, providing all facts necessary for the Court to determine if they satisfy the definition of a
“high-frequency litigant” as provided by California Civil Procedure Code sections 425.55(b)(1) &
(2).

Plaintiff shall file a Response to this Order to Show Cause by no later than August 1, 2025. 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 declining to exercise
supplemental jurisdiction over the Unruh Act and other state law claims, if any, and the dismissal
of any such claims pursuant to 28 U.S.C. § 1367(c).