

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PRECEDENTIAL VALUE	Unpublished, nonprecedential district-court order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)