

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Iman Woodley v. WSFive-55, Inc., et al.

No. CV 25-12413 PA (SSCx), United States District Court for the Central District of California (January 6, 2026)

SUMMARY

The United States District Court for the Central District of California ordered the plaintiff to show cause why the court should exercise supplemental jurisdiction over claims under California's Unruh Civil Rights Act and any other state-law claims. The order also requires the plaintiff and counsel to provide declarations addressing whether they qualify as high-frequency litigants and to identify the statutory damages sought.

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	January 6, 2026
DOCKET	CV 25-12413 PA (SSCx)
DISPOSITION	other
PROCEDURAL POSTURE	The district court issued a sua sponte order to show cause during the initial proceedings, requiring the plaintiff to explain why the court should exercise supplemental jurisdiction over state-law claims.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court order

TOPICS

- subject matter jurisdiction
- civil procedure
- ada / disability
- damages

PRACTICE AREAS

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

QUESTIONS PRESENTED

1. Whether the district court should exercise supplemental jurisdiction over the California Unruh Civil Rights Act claim and any other state-law claims under 28 U.S.C. § 1367.
2. What information plaintiff and plaintiff's counsel must provide concerning the amount of statutory damages sought and potential high-frequency-litigant status under California law.

HOLDINGS

1. The court ordered plaintiff to show cause in writing why the court should exercise supplemental jurisdiction over the Unruh Act claim and any other state-law claims asserted in the complaint.
2. Plaintiff was required to identify the amount of statutory damages sought and plaintiff and counsel were required to submit declarations under penalty of perjury addressing facts relevant to whether they satisfy California's definition of a high-frequency litigant.

KEY QUOTATIONS

“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.”

“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”

FACTUAL BACKGROUND

The complaint alleges a violation of the Americans with Disabilities Act and seeks injunctive relief. It also asserts a California Unruh Civil Rights Act claim seeking damages. The court concluded that it appeared to possess only supplemental jurisdiction over the Unruh Act claim and required information relevant to exercising that jurisdiction and to plaintiff's potential status as a high-frequency litigant.

PROCEDURAL HISTORY

Plaintiff filed a complaint asserting an Americans with Disabilities Act claim for injunctive relief and a California Unruh Civil Rights Act claim for damages. The court ordered plaintiff to show cause why supplemental jurisdiction should be exercised over the Unruh Act claim and any other state-law claims, and required additional information concerning statutory damages and whether plaintiff and counsel qualify as high-frequency litigants under California law.

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)

