

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Leemanuel Welch v. Dokument USA, Inc. et al.

Welch v. Dokument USA · No. 2:25-cv-11084-SB-RAO · Decided November 26, 2025

SUMMARY

The Central District of California orders Plaintiff Leemanuel Welch to show cause why his California Unruh Act claim should not be dismissed without prejudice for lack of supplemental jurisdiction. Relying on Ninth Circuit precedent concerning California’s regulation of high-frequency disability litigation, the Court states that exceptional circumstances may warrant declining jurisdiction under 28 U.S.C. § 1367(c)(4) and requires Plaintiff to provide information concerning damages and high-frequency-litigant status.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Stanley Blumenfeld, Jr.
JURISDICTION	United States District Court for the Central District of California
DECIDED	November 26, 2025
DOCKET	2:25-cv-11084-SB-RAO
DISPOSITION	other
PROCEDURAL POSTURE	The district court issued an order to show cause directing Plaintiff to explain why his state-law Unruh Act claim should not be dismissed without prejudice for lack of supplemental jurisdiction.
STANDARD OF REVIEW	A district court's decision whether to exercise supplemental jurisdiction is discretionary.
PRECEDENTIAL VALUE	Unknown

TOPICS

- civil procedure
- ada / disability
- public accommodations discrimination
- civil rights

PRACTICE AREAS

- civil procedure
- disability rights
- civil rights

QUESTIONS PRESENTED

1. Whether the Unruh Act claim falls within the district court's supplemental jurisdiction because it is closely related to the ADA claim.
2. Whether exceptional circumstances under 28 U.S.C. § 1367(c)(4), including the federalism and comity concerns identified in *Arroyo v. Rosas*, warrant declining supplemental jurisdiction over the Unruh Act claim at this early stage of the litigation.

HOLDINGS

1. The Unruh Act claim is within the court's supplemental jurisdiction because it is closely related to the ADA claim, but supplemental jurisdiction is discretionary rather than a right of the plaintiff.
2. The circumstances identified by the Ninth Circuit in *Arroyo v. Rosas* can constitute exceptional circumstances under § 1367(c)(4) supporting a district court's decision to decline supplemental jurisdiction over an ADA-based Unruh Act claim, particularly where the case remains at an early stage and the state-law claim has not been adjudicated.

KEY QUOTATIONS

“supplemental jurisdiction “is a doctrine of discretion, not of plaintiff’s right,” and district courts “can decline to exercise jurisdiction over pendent claims for a number of valid reasons.””

“retention of supplemental jurisdiction over ADA-based Unruh Act claims threatens to substantially thwart California’s carefully crafted reforms in this area and to deprive the state courts of their critical role in effectuating the policies underlying those reforms.” (1213)

“Accordingly, the Court ORDERS Plaintiff within 14 days after entry of this Order to show cause in writing why the Court should not dismiss without prejudice his Unruh Act claim under § 1367(c)(4).”

FACTUAL BACKGROUND

Plaintiff has a physical disability that limits his ability to walk. He alleges that Defendants' visa, passport, and notary office imposes physical barriers that impede his access. He asserts claims under the ADA and the California Unruh Act, including a claim for statutory damages under the Unruh Act.

PROCEDURAL HISTORY

Plaintiff filed an action alleging that Defendants' visa, passport, and notary office presents physical barriers violating, among other laws, the Americans with Disabilities Act and the California Unruh Civil Rights Act. The court determined that the Unruh Act claim was closely related to the ADA claim and therefore within its supplemental jurisdiction, but it had not yet adjudicated the merits of any claim. Relying on Ninth Circuit precedent concerning California's regulation of high-frequency disability-access litigation, the court ordered Plaintiff to show cause why the Unruh Act claim should not be dismissed without prejudice under 28 U.S.C. § 1367(c)(4).

DISPOSITION

other

CASES CITED

- City of Chi. v. Int'l Coll. of Surgeons, 522 U.S. 156, 172 (1997)
- Arroyo v. Rosas, 19 F.4th 1202, 1213, 1215-17 (9th Cir. 2021)

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