

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Robert Cauley v. Carson-Denker Car Wash, et al.

Cauley · No. 2:25-cv-10072-DSF-SSC · Decided November 18, 2025

SUMMARY

This Order to Show Cause was issued by the United States District Court for the Central District of California in an action alleging violations of the Americans with Disabilities Act and California’s Unruh Civil Rights Act. The Court directs the plaintiff to explain why it should exercise supplemental jurisdiction over the state-law claims and to provide information concerning statutory damages and possible high-frequency-litigant status. A written response was ordered by December 2, 2025, with a warning that failure to respond could result in dismissal.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Dale S. Fischer
DECIDED	November 18, 2025
DOCKET	2:25-cv-10072-DSF-SSC
DISPOSITION	other
PROCEDURAL POSTURE	The district court issued a sua sponte order to show cause requiring the plaintiff to explain why the court should exercise supplemental jurisdiction over claims under California's Unruh Civil Rights Act and any other state-law claims.
STANDARD OF REVIEW	The court considered whether to exercise discretionary supplemental jurisdiction under 28 U.S.C. § 1367(c), weighing judicial economy, convenience, fairness, and comity.
PRECEDENTIAL VALUE	unpublished district court order; limited persuasive value

TOPICS

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

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the district court should exercise supplemental jurisdiction over the Unruh Act claim and any other state-law claims under 28 U.S.C. § 1367(c).
2. Whether plaintiff and counsel must provide information and declarations addressing plaintiff's potential status as a high-frequency litigant under California law.

HOLDINGS

1. The court did not finally resolve supplemental jurisdiction; instead, it ordered plaintiff to show cause in writing why the court should exercise supplemental jurisdiction over the state-law claims.
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 containing facts necessary to determine whether plaintiff meets California's definition of a high-frequency litigant.

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 asserts a claim for damages under California's Unruh Civil Rights Act. The order indicates that plaintiff may qualify as a high-frequency litigant under California law and therefore required plaintiff and counsel to provide declarations concerning that status and to identify the statutory damages sought.

PROCEDURAL HISTORY

Plaintiff filed a complaint asserting an ADA claim for injunctive relief and an Unruh Act claim for damages. Before resolving the claims, the district court questioned whether it should exercise supplemental jurisdiction over the state-law claims in light of California's statutory regime governing high-frequency disability-access litigants. The court ordered plaintiff to respond by December 2, 2025, warning that failure to respond could result in dismissal without prejudice or declining supplemental jurisdiction over the state-law claims.

DISPOSITION

other

CASES CITED

- City of Chicago v. International College of Surgeons, 522 U.S. 156, 173 (1997)

- *Carnegie-Mellon University v. Cohill*, 484 U.S. 343, 350 (1988)
- *Vo v. Choi*, 49 F.4th 1167 (9th Cir. 2022)
- *Arroyo v. Rosas*, 19 F.4th 1202 (9th Cir. 2021)

OPINION

Robert Cauley v. Carson–Denker Car Wash, et al.

PER CURIAM.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

ROBERT CAULEY 2:25-cv-10072-DSF-SSC

Plaintiff(s),

ORDER TO SHOW CAUSE

v. CARSON–DENKER CAR WASH, et al. Defendant(s). 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 (1997) (emphasis added) (quoting *Carnegie-Mellon Univ. v. Cohill*, 484 U.S. 343, 350 (1988)). California has a statutory regime to address “high-frequency litigants” bringing construction-related disability access claims. This includes specific pleading requirements and a higher filing fee for litigants who meet certain criteria. See Cal. Civ. Code § 55.31(b); Cal. Civ. Proc. Code § 425.50; Cal. Civ. Proc. Code § 425.55; Cal. Gov’t Code § 70616.5. Numerous district courts have found that this California legislative attempt to regulate the prosecution of disability access cases by certain high-frequency plaintiffs provides “compelling reasons” and constitutes an “exceptional circumstance” justifying the decline of supplemental jurisdiction over disability state law claims in certain cases. This approach has been upheld by the Ninth Circuit multiple times. See *Vo v. Choi*, 49 F.4th 1167 (9th Cir. 2022); *Arroyo v. Rosas*, 19 F.4th 1202 (9th Cir. 2021). 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 December 2, 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). IT IS SO ORDERED. Pied WAG! he rt ao A Date: November 18, 2025 Dale S. Fischer United States District Judge