

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Deondre Raglin v. Barstow Flower Shop, et al.

Raglin v. Barstow Flower Shop · No. 5:25-cv-02017-JAK-DTB · Decided August 13, 2025

SUMMARY

The United States District Court for the Central District of California ordered Plaintiff Deondre Raglin to show cause why the court should not decline supplemental jurisdiction over his California state-law accessibility claims. The order discusses California’s heightened pleading requirements and high-frequency litigant provisions for construction-related accessibility claims. Plaintiff was directed to identify the statutory damages sought and submit a declaration addressing whether he qualifies as a high-frequency litigant.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	John A. Kronstadt
JURISDICTION	United States District Court for the Central District of California
DECIDED	August 13, 2025
DOCKET	5:25-cv-02017-JAK-DTB
DISPOSITION	other
PROCEDURAL POSTURE	The court issued an order to show cause why it should not decline to exercise supplemental jurisdiction over Plaintiff's California state-law claims.
STANDARD OF REVIEW	Supplemental jurisdiction is discretionary; the court must consider whether related state-law claims form part of the same Article III case or controversy and, in deciding whether to exercise jurisdiction, consider judicial economy, convenience, fairness, and comity.
PRECEDENTIAL VALUE	Unpublished federal district court order; precedential status is unknown and the order is not a final merits decision.

TOPICS

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

PRACTICE AREAS

Civil procedure

Supplemental jurisdiction

Americans with Disabilities Act

California civil rights law

Construction accessibility litigation

QUESTIONS PRESENTED

1. Whether the court should decline to exercise supplemental jurisdiction over the state-law claims under 28 U.S.C. § 1367(c) in light of California's heightened requirements for construction-related accessibility claims and Plaintiff's alleged status as a high-frequency litigant.

HOLDINGS

1. Supplemental jurisdiction over related state-law claims is discretionary rather than a right of the plaintiff, and the court may consider judicial economy, convenience, fairness, and comity at every stage of the litigation.

KEY QUOTATIONS

“This “is a doctrine of discretion, not of plaintiff’s right.”” (at 1)

“In order to decide whether to exercise jurisdiction over pendent state law claims, a district court should consider . . . at every stage of the litigation, the values of judicial economy, convenience, fairness, and comity.” (at 1)

FACTUAL BACKGROUND

The Complaint alleged violations of the Americans with Disabilities Act, the California Unruh Civil Rights Act, and other California laws arising from alleged construction-related accessibility issues. The court's docket review showed that Plaintiff had filed more than ten construction-related accessibility actions in the District during the year preceding this action, which would qualify Plaintiff as a high-frequency litigant in California Superior Court. The court expressed concern that exercising supplemental jurisdiction could allow a high-frequency plaintiff to avoid California's heightened pleading and fee requirements by proceeding in federal court.

PROCEDURAL HISTORY

Plaintiff filed a federal action asserting claims under the Americans with Disabilities Act and California law, invoking supplemental jurisdiction for the state-law claims. After reviewing the Complaint and the District's docket, the court ordered Plaintiff to explain why the state-law claims should not be dismissed without prejudice under 28 U.S.C. § 1367(c). The court directed Plaintiff and Defendant to file responses before taking the matter under submission.

DISPOSITION

other

CASES CITED

- United Mine Workers v. Gibbs, 383 U.S. 715, 726 (1966)
- Nishimoto v. Federman-Bachrach & Assocs., 903 F.2d 709, 715 (9th Cir. 1990)
- Whitaker v. RCP Belmont Shore LLC, No. LA CV19-09561 JAK (JEMx), 2020 WL 3800449, at *6-8 (C.D. Cal. Mar. 30, 2020)
- Garibay v. Rodriguez, No. 2:18-cv-09187-PA (AFMx), 2019 WL 5204294, at *1-6 (C.D. Cal. Aug. 27, 2019)
- Perri v. Thrifty Payless, No. 2:19-CV-07829-CJC (SKx), 2019 WL 7882068, at *2 (C.D. Cal. Oct. 8, 2019)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/united-states-district-court-for-the-central-district-of-california-united-states-district-court-for/2025/deondre-raglin-v-barstow-flower-shop-et-al-4rpn4cqa>