

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Clifton Walker v. Joe Oliveri Hair Design Inc., et al.

No. CV 26-201 PA (SSCx), United States District Court for the Central District of California (January 22, 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 court also required the plaintiff and counsel to provide declarations addressing whether they qualify as high-frequency litigants and to identify the statutory damages sought, with a response due February 5, 2026.

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 22, 2026
DOCKET	CV 26-201 PA (SSCx)
DISPOSITION	other
PROCEDURAL POSTURE	After the filing of a complaint asserting an Americans with Disabilities Act claim for injunctive relief and a California Unruh Civil Rights Act claim for damages, the district court issued an order to show cause concerning supplemental jurisdiction over the state-law claims.
PRECEDENTIAL VALUE	Unknown; order to show cause with no reported citation

TOPICS

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

PRACTICE AREAS

- civil procedure
- civil rights
- Americans with Disabilities Act
- supplemental jurisdiction

QUESTIONS PRESENTED

1. Whether the district court should exercise supplemental jurisdiction over the Unruh Civil Rights Act claim and any other state-law claims alleged in the complaint.
2. What statutory damages plaintiff seeks to recover.
3. Whether plaintiff and plaintiff's counsel satisfy the California statutory 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.’”” (unpaginated)

“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).” (unpaginated)

FACTUAL BACKGROUND

The complaint asserts a claim for injunctive relief based on an alleged violation of the Americans with Disabilities Act and a claim for damages under California's Unruh Civil Rights Act. The court stated that it appeared to have only supplemental jurisdiction over the Unruh Act claim and any other state-law claim alleged. The court required information about the amount of statutory damages and declarations concerning plaintiff's and counsel's potential status as high-frequency litigants under California law.

PROCEDURAL HISTORY

Plaintiff filed the action in federal district court. The court determined that it appeared to possess only supplemental jurisdiction over the Unruh Act claim and any other state-law claim, and ordered plaintiff to explain why the court should exercise that jurisdiction. The court also required plaintiff and counsel to submit declarations addressing whether they qualify as high-frequency litigants and to identify the statutory damages sought.

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)

OPINION

CENTRAL DISTRICT OF CALIFORNIA CIVIL MINUTES - GENERAL Case No. CV 26-201 PA (SSCx) Date January 22, 2026 Title Clifton Walker v. Joe Oliveri Hair Design Inc., et al. Present: The Honorable PERCY ANDERSON, UNITED STATES DISTRICT JUDGE Kamilla Sali-Suleyman Not Reported Deputy Clerk Court Reporter / Recorder Attorneys Present for Plaintiffs: Attorneys Present for Defendants: None None Proceedings: IN CHAMBERS — ORDER TO SHOW CAUSE 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, 118 S. Ct.

523, 534, 139 L. Ed. 2d 525 (1997) (emphasis added) (quoting *Carnegie-Mellon Univ. v. Cohill*, 484 U.S. 343, 350, 108 S. Ct. 614, 619, 98 L. Ed. 2d 720 (1988)). 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 February 5, 2026. 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).