

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Colton Bryant v. Dilip Solanki

Bryant v. Solanki · No. 2:25-cv-09792-SB-AGR · Decided October 23, 2025

SUMMARY

The United States District Court for the Central District of California issued an order to show cause concerning Plaintiff’s Unruh Act claim accompanying his ADA accessibility claims. Relying on Ninth Circuit precedent regarding California’s high-frequency litigant reforms and federal-state comity, the Court ordered Plaintiff to explain why the Unruh Act claim should not be dismissed without prejudice for lack of supplemental jurisdiction.

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	October 23, 2025
DOCKET	2:25-cv-09792-SB-AGR
DISPOSITION	other
PROCEDURAL POSTURE	At the early pleading stage of an action alleging ADA and California Unruh Act violations, the district court issued an order to show cause why the Unruh Act claim should not be dismissed without prejudice for lack of supplemental jurisdiction.
STANDARD OF REVIEW	Abuse-of-discretion principles govern a district court's decision whether to exercise supplemental jurisdiction; the court's authority under 28 U.S.C. § 1367(c) is discretionary.
PRECEDENTIAL VALUE	Unknown; district court order to show cause with no reporter citation.

TOPICS

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

PRACTICE AREAS

- Civil procedure
- Disability rights
- Federal courts
- Supplemental jurisdiction

QUESTIONS PRESENTED

1. Whether the district court may exercise supplemental jurisdiction over Plaintiff's closely related Unruh Act claim under 28 U.S.C. § 1367(a).
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.
3. What information Plaintiff must provide to show cause why the Unruh Act claim should not be dismissed without prejudice.

HOLDINGS

1. Because the Unruh Act claim is closely related to the ADA claim, the court has authority under 28 U.S.C. § 1367(a) to exercise supplemental jurisdiction over it.
2. The circumstances identified by the Ninth Circuit in *Arroyo v. Rosas*—particularly the effect of federal ADA litigation seeking Unruh Act statutory damages on California's statutory reforms and state-court role—qualify as exceptional circumstances that may justify declining supplemental jurisdiction under 28 U.S.C. § 1367(c)(4).

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.” (19 F.4th at 1213)

FACTUAL BACKGROUND

Plaintiff Colton Bryant has spinal paraplegia and uses a wheelchair. He alleges that Defendant Dilip Solanki's inn contains physical barriers that impede his access, in violation of the ADA and the California Unruh Act. The court relied on the fact that the case was at a very early stage and that it had not adjudicated the merits of any claim.

PROCEDURAL HISTORY

Plaintiff filed suit alleging that Defendant's inn contains physical barriers that impede wheelchair access, asserting claims under the ADA and the Unruh Act. The court concluded that it had authority to exercise supplemental jurisdiction over the Unruh Act claim but ordered Plaintiff to show cause why the court should not decline that jurisdiction under 28 U.S.C. § 1367(c)(4). No merits determination had yet been made, and the court warned that failure to respond would result in dismissal without prejudice without further order.

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 (9th Cir. 2021)

OPINION

Colton Bryant v. Dilip Solanki

PER CURIAM.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

COLTON BRYANT, Case No. 2:25-cv-09792-SB-AGR Plaintiff,

v. ORDER TO SHOW CAUSE

DILIP SOLANKI,

Defendant. Plaintiff Colton Bryant, who has spinal paraplegia and requires the use of a wheelchair, filed this suit alleging that Defendant's inn imposes physical barriers that impede his access, in violation of, inter alia, the Americans with Disabilities Act (ADA) and the Unruh Act. Because Plaintiff's Unruh Act claim is closely related to his ADA claim, the Court has authority to exercise supplemental jurisdiction over the Unruh Act claim under 28 U.S.C. § 1367(a). However, 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." City of Chi. v. Int'l Coll. of Surgeons, 522 U.S. 156, 172 (1997) (internal quotation marks and citations omitted). This discretion is codified in § 1367(c): The district courts may decline to exercise supplemental jurisdiction over a claim under subsection (a) if—

(1) the claim raises a novel or complex issue of State law,

(2) the claim substantially predominates over the claim or claims over which the district court has original jurisdiction,

(3) the district court has dismissed all claims over which it has original jurisdiction, or

(4) in exceptional circumstances, there are other compelling

reasons for declining jurisdiction. 28 U.S.C. § 1367(c). In a published decision, the Ninth Circuit explained that the California Legislature's 2012 and 2015 amendments to the Unruh Act, which were intended to protect businesses from abusive litigation by high-frequency litigants bringing construction-related claims, had led to a surge of filings in federal courts of ADA cases seeking statutory damages under the Unruh Act. Arroyo v. Rosas, 19 F.4th 1202 (9th Cir. 2021). The Ninth Circuit agreed with the district court that this shift in filings from state courts to federal courts had circumvented the state legislature's goals and "rendered [the new statutory requirements] largely toothless, because they can now be readily evaded." Id. at 1213. The court explained that "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.” Id. Thus, the court held that these circumstances are “exceptional” within the meaning of § 1367(c)(4) and therefore potentially justified declining supplemental jurisdiction over the plaintiff’s Unruh Act claim. See id. (“The district court did not abuse its discretion in concluding that this extraordinary situation threatens unusually significant damage to federal-state comity and presents ‘exceptional circumstances’ within the meaning of § 1367(c)(4).”). However, because the district court had waited to decline supplemental jurisdiction until after granting summary judgment on the plaintiff’s ADA claim, thereby effectively deciding the Unruh Act claim, the Ninth Circuit reversed the court’s decision to decline supplemental jurisdiction, holding that it had waited too long to invoke the comity interest. Id. at 1215–17. Unlike Arroyo, this case is still at a very early stage, and this Court has not yet addressed or adjudicated the merits of any of Plaintiff’s claims. This appears to be a case in which the Court should decline supplemental jurisdiction over Plaintiff’s Unruh Act claim under § 1367(c)(4) to protect the comity interests identified in Arroyo. 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). Plaintiff’s response must identify the amount of statutory damages Plaintiff seeks to recover and must be supported by declarations, signed under penalty of perjury, providing all facts necessary for the Court to determine if Plaintiff and his counsel satisfy the definition of a “high-frequency litigant” as provided by Cal. Civ. Proc. Code § 425.55(b)(1)–(2). If Plaintiff fails to file a response within 14 days after entry of this Order, the Court will decline to exercise supplemental jurisdiction over his Unruh Act claim, and the Unruh Act claim will be automatically dismissed without prejudice without further order of the Court. Date: October 23, 2025

Stanley Blumenfeld, Jr. United States District Judge