

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)

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