

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Jeremy Holland v. Star Smog and Alignment Haus LLC, et al.

Holland · No. 2:25-cv-10405-WLH-PD · Decided December 3, 2025

SUMMARY

The United States District Court for the Central District of California ordered Plaintiff Jeremy Holland to show cause why the court should exercise supplemental jurisdiction over his California Unruh Civil Rights Act and related state-law claims. The court highlighted California’s heightened pleading requirements and high-frequency litigant provisions for disability-access litigation, and directed Plaintiff and counsel to provide declarations addressing high-frequency-litigant status and to identify the statutory damages sought. The response is due within fourteen days, and failure to respond may result in dismissal of the state-law claims under 28 U.S.C. § 1367(c).

CASE DETAILS

COURT	United States District Court for the Central District of California
JURISDICTION	United States District Court for the Central District of California
DECIDED	December 3, 2025
DOCKET	2:25-cv-10405-WLH-PD
DISPOSITION	other
PROCEDURAL POSTURE	On the court's own initiative, the district court issued an order to show cause why it should exercise supplemental jurisdiction over the plaintiff's state-law claims.
STANDARD OF REVIEW	Supplemental jurisdiction under 28 U.S.C. § 1367 is discretionary; the court must consider the statutory factors and the values of judicial economy, convenience, fairness, and comity.
PRECEDENTIAL VALUE	Unpublished district-court order to show cause; no final determination on supplemental jurisdiction appears in the document.

TOPICS

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

PRACTICE AREAS

- Civil procedure
- Federal jurisdiction
- Disability discrimination
- Public accommodations

QUESTIONS PRESENTED

1. Whether the court should exercise supplemental jurisdiction over the plaintiff's Unruh Civil Rights Act claim and any related state-law claims.
2. What information plaintiff and counsel must provide in response to the order to show cause concerning statutory damages and high-frequency-litigant status.

HOLDINGS

1. Supplemental jurisdiction is discretionary rather than a plaintiff's right, and the district court may decline to exercise it under the circumstances identified in 28 U.S.C. § 1367(c).
2. The plaintiff must file a written response within fourteen days explaining why the court should exercise supplemental jurisdiction, identifying the statutory damages sought, and providing declarations addressing whether plaintiff and counsel meet the statutory definition of high-frequency litigants.

KEY QUOTATIONS

“is a doctrine of discretion, not of plaintiff’s right” (at 2)

“the interests of fairness and comity counsel against exercising supplemental jurisdiction over construction-access claims brought under the Unruh Act.” (at 3)

FACTUAL BACKGROUND

Plaintiff brought an ADA construction-accessibility claim seeking injunctive relief and a related claim for damages under California's Unruh Civil Rights Act. The court noted California's statutory efforts to deter allegedly baseless or vexatious disability-access litigation, including heightened pleading requirements and a high-frequency-litigant fee. The court required information about the damages sought and plaintiff's and counsel's high-frequency-litigant status before deciding whether to retain the state-law claims.

PROCEDURAL HISTORY

The complaint asserts a federal Americans with Disabilities Act claim for injunctive relief and a California Unruh Civil Rights Act claim for damages. Although the plaintiff requested supplemental jurisdiction over the Unruh Act claim under 28 U.S.C. § 1367, the court ordered the plaintiff to explain why supplemental jurisdiction should be exercised and to provide information relevant to California's high-frequency-litigant requirements. The court deferred a final jurisdictional determination pending the plaintiff's response.

DISPOSITION

other

CASES CITED

- Carnegie-Mellon Univ. v. Cohill, 484 U.S. 343, 350 (1988)
- Acri v. Varian Assocs., 114 F.3d 999, 1000 (9th Cir. 1997)
- Schutza v. Cuddeback, 262 F. Supp. 3d 1025, 1031 (S.D. Cal. 2017)

