

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Theresa Brooke v. Camarillo Motels LLC

Brooke v. Camarillo Motels LLC · No. 2:25-cv-04593-WLH-PD · Decided June 5, 2025

SUMMARY

The United States District Court for the Central District of California orders the plaintiff to show cause why the court should exercise supplemental jurisdiction over claims under California’s Unruh Civil Rights Act and related state law. The order discusses 28 U.S.C. § 1367(c), California’s efforts to address disability-access litigation, and decisions declining supplemental jurisdiction over certain construction-access claims. Plaintiff must identify the statutory damages sought and provide declarations addressing whether plaintiff and counsel qualify as high-frequency litigants.

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	June 5, 2025
DOCKET	2:25-cv-04593-WLH-PD
DISPOSITION	other
PROCEDURAL POSTURE	The complaint asserted a claim for injunctive relief under the Americans with Disabilities Act and a damages claim under California's Unruh Civil Rights Act. The district court issued an order to show cause why it should exercise supplemental jurisdiction over the Unruh Act and related state-law claims.
STANDARD OF REVIEW	District courts have discretion to decline supplemental jurisdiction under 28 U.S.C. § 1367(c), weighing judicial economy, convenience, fairness, and comity.
PRECEDENTIAL VALUE	unpublished district court order; precedential status not stated

TOPICS

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

PRACTICE AREAS

- civil procedure
- Americans with Disabilities Act
- California Unruh Civil Rights Act
- supplemental jurisdiction

QUESTIONS PRESENTED

1. Whether the district court should exercise supplemental jurisdiction over Plaintiff's Unruh Civil Rights Act claim and any related state-law claims.
2. What information Plaintiff and counsel must provide to permit the court to evaluate whether declining supplemental jurisdiction is warranted, including the amount of statutory damages sought and whether Plaintiff qualifies as a high-frequency litigant.

HOLDINGS

1. Supplemental jurisdiction is a discretionary doctrine rather than a plaintiff's right, and a district court may decline jurisdiction over a related state-law claim under the circumstances identified in 28 U.S.C. § 1367(c).

KEY QUOTATIONS

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

“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.” (at 2)

FACTUAL BACKGROUND

The complaint alleged a violation of the ADA involving accessibility at a place of public accommodation and sought injunctive relief. It also sought damages under California's Unruh Civil Rights Act based on the alleged accessibility violation.

PROCEDURAL HISTORY

Plaintiff filed the action in the Central District of California invoking federal-question jurisdiction under the ADA and requesting supplemental jurisdiction over state-law claims. Before deciding whether to retain the state-law claims, the court ordered Plaintiff and counsel to provide information concerning statutory damages and whether Plaintiff qualifies as a high-frequency litigant.

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)