

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

K. Phillip Taylor v. Walter T. Anderson, as Trustee of the Anderson-
McChristy Family Trust, and Does 1 to 10

Taylor v. Anderson · No. 5:25-cv-01312-JAK (SPx) · Decided June 12, 2025

SUMMARY

The United States District Court for the Central District of California ordered Plaintiff K. Phillip Taylor to show cause why the Court should not decline supplemental jurisdiction over his California-law claims accompanying his Americans with Disabilities Act claims. The Court directed Plaintiff to identify the statutory damages sought and provide a declaration addressing whether he qualifies as a high-frequency litigant, with responses due July 7, 2025, and warned that failure to respond could result in dismissal of the state-law claims without prejudice.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	John A. Kronstadt
JURISDICTION	United States District Court for the Central District of California
DECIDED	June 12, 2025
DOCKET	5:25-cv-01312-JAK (SPx)
DISPOSITION	other
PROCEDURAL POSTURE	The court, on review of the complaint, issued an order to show cause why it should not decline supplemental jurisdiction over the plaintiff's California state-law claims.
STANDARD OF REVIEW	Under 28 U.S.C. § 1367, supplemental jurisdiction is discretionary, and the court must consider judicial economy, convenience, fairness, and comity at every stage of the litigation.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

- subject matter jurisdiction
- civil procedure
- ada / disability

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the court should decline to exercise supplemental jurisdiction over the Unruh Act and other state-law claims under 28 U.S.C. § 1367.
2. Whether plaintiff should be required to show cause and provide information concerning his statutory-damages demand and status as a potential high-frequency litigant before the court decides whether to exercise supplemental jurisdiction.

HOLDINGS

1. Supplemental jurisdiction over state-law claims within the same Article III case or controversy is discretionary rather than a right of the plaintiff, and the court must consider judicial economy, convenience, fairness, and comity at every stage of the litigation.
2. Plaintiff must file a timely response addressing the statutory damages sought and submit a declaration providing evidence relevant to whether he qualifies as a high-frequency litigant under California law.

KEY QUOTATIONS

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

“In order to decide whether to exercise jurisdiction over pendent state law claims, a district court should consider . . . at every stage of the litigation, the values of judicial economy, convenience, fairness, and comity.” (at 1)

FACTUAL BACKGROUND

The complaint asserted ADA claims and California Unruh Act claims involving alleged construction-related accessibility violations. A docket review showed that plaintiff had filed more than ten actions advancing construction-related accessibility claims during the year preceding this action. The court noted that California law imposes heightened pleading requirements and a high-frequency litigant fee for qualifying construction-related accessibility claims.

PROCEDURAL HISTORY

Plaintiff filed a federal action alleging violations of the Americans with Disabilities Act and California's Unruh Civil Rights Act, invoking supplemental jurisdiction over the state-law claims. Before resolving the jurisdictional issue, the court ordered plaintiff to file a response addressing the amount of statutory damages sought and whether he qualified as a high-frequency litigant. The court warned that failure to respond could result in dismissal without prejudice of the state-law claims.

DISPOSITION

other

CASES CITED

- United Mine Workers v. Gibbs, 383 U.S. 715, 726 (1966)
- Nishimoto v. Federman-Bachrach & Assocs., 903 F.2d 709, 715 (9th Cir. 1990)
- Whitaker v. RCP Belmont Shore LLC, No. LA CV19-09561 JAK (JEMx), 2020 WL 3800449, at *6-*8 (C.D. Cal. Mar. 30, 2020)
- Garibay v. Rodriguez, No. 2:18-cv-09187-PA (AFMx), 2019 WL 5204294, at *1-*6 (C.D. Cal. Aug. 27, 2019)
- Perri v. Thrifty Payless, No. 2:19-CV-07829-CJC (SKx), 2019 WL 7882068, at *2 (C.D. Cal. Oct. 8, 2019)

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