

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Latanya Williams v. Huzzah Toys LLC

Williams v. Huzzah Toys LLC · No. CV 25-01051-AS · Decided June 5, 2025

SUMMARY

The United States District Court for the Central District of California issued an order to show cause concerning whether it should decline supplemental jurisdiction over Plaintiff’s California state-law claims. The Court directed Plaintiff to explain why supplemental jurisdiction should be exercised, identify the statutory damages sought, and provide declarations addressing high-frequency-litigant status under California law.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Alka Sagar
JURISDICTION	United States District Court for the Central District of California
DECIDED	June 5, 2025
DOCKET	CV 25-01051-AS
DISPOSITION	other
PROCEDURAL POSTURE	The court issued an order to show cause directing Plaintiff to explain why the court should exercise supplemental jurisdiction over the state-law claims asserted alongside an Americans with Disabilities Act claim.
STANDARD OF REVIEW	Abuse-of-discretion principles govern the decision whether to exercise supplemental jurisdiction under 28 U.S.C. § 1367; the order did not make a final jurisdictional determination.
PRECEDENTIAL VALUE	unpublished
PARTIES	Latanya Williams v. Huzzah Toys LLC, et al.

TOPICS

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

PRACTICE AREAS

Civil procedure

Americans with Disabilities Act

Supplemental jurisdiction

California disability-access law

QUESTIONS PRESENTED

1. Whether the court should exercise supplemental jurisdiction over Plaintiff's Unruh Act, Disabled Persons Act, Health and Safety Code, and negligence claims.
2. Whether Plaintiff must provide information and sworn declarations concerning the amount of statutory damages sought and Plaintiff's and counsel's potential high-frequency-litigant status before the court decides whether to exercise supplemental jurisdiction.

HOLDINGS

1. The court deferred the jurisdictional decision and ordered Plaintiff to show cause within ten days why the court should exercise supplemental jurisdiction over the Unruh Act and other state-law claims.
2. Plaintiff and counsel were ordered to submit declarations under penalty of perjury providing facts necessary to determine whether they satisfy California's definitions of high-frequency litigant, including the number of relevant claims filed or handled during the preceding twelve months.

KEY QUOTATIONS

“However, supplemental jurisdiction “is a doctrine of discretion, not of plaintiffs right,” and district courts “can decline to exercise jurisdiction over pendent claims for a number of valid reasons.”” (Order to Show Cause)

“In light of the foregoing, the Court orders Plaintiff to show cause in writing within 10 days why the Court should exercise supplemental jurisdiction over the Unruh Act claim and any other state law claim asserted in the Complaint.” (Order to Show Cause)

FACTUAL BACKGROUND

The complaint alleges an ADA violation involving disability access and seeks injunctive relief under federal law. It also asserts California-law claims, including an Unruh Civil Rights Act claim seeking damages. The court focused on California's heightened pleading and disclosure requirements for construction-related disability-access claims and the possibility that Plaintiff or counsel may qualify as high-frequency litigants.

PROCEDURAL HISTORY

Plaintiff filed a complaint asserting an ADA claim for injunctive relief and state-law claims for damages and related relief under the Unruh Civil Rights Act, the Disabled Persons Act, the California Health and Safety Code, and negligence. Before resolving the jurisdictional issue, the court ordered Plaintiff to respond in writing within ten days and to submit declarations addressing whether Plaintiff and counsel qualify as high-frequency litigants under California law.

DISPOSITION

other

CASES CITED

- City of Chicago v. International College of Surgeons, 522 U.S. 156, 172-73 (1997)
- Carnegie-Mellon University v. Cohill, 484 U.S. 343, 350 (1988)
- Schutza v. Cuddeback, 262 F. Supp. 3d 1025, 1031 (S.D. Cal. 2017)
- Arroyo v. Rosas, 19 F.4th 1202, 1211 (9th Cir. 2021)

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