

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Angel Garcia v. Victor Manuel Venegas

No. 2:25-cv-03202-JLS-SK, United States District Court for the Central District of California (April 16, 2025)

SUMMARY

The U.S. District Court for the Central District of California orders Plaintiff to show cause why the Court should not decline supplemental jurisdiction over claims under California’s Unruh Act and other state laws. The Court requires Plaintiff to identify the statutory damages sought and provide declarations addressing whether Plaintiff and counsel are high-frequency litigants. Failure to respond adequately may result in dismissal of the state-law claims or the entire action without prejudice.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Josephine L. Staton
JURISDICTION	U.S. District Court for the Central District of California
DECIDED	April 16, 2025
DOCKET	2:25-cv-03202-JLS-SK
DISPOSITION	other
PROCEDURAL POSTURE	The plaintiff filed a federal action asserting injunctive relief under the Americans with Disabilities Act and damages under California's Unruh Act and other state-law claims. The district court issued an order to show cause why it should not decline supplemental jurisdiction over the state-law claims.
STANDARD OF REVIEW	A district court has discretion under 28 U.S.C. § 1367(c) to decline supplemental jurisdiction, based on factors including the circumstances of the case, the nature and governing character of the state-law claims, and the relationship between the federal and state claims.
PRECEDENTIAL VALUE	unpublished, nonprecedential district-court order
PARTIES	Angel Garcia v. Victor Manuel Venegas, et al.

TOPICS

subject matter jurisdiction

civil procedure

public accommodations discrimination

ada / disability

PRACTICE AREAS

civil procedure

disability rights

supplemental jurisdiction

QUESTIONS PRESENTED

1. Whether the court should require plaintiff to show cause why it should not decline supplemental jurisdiction over the Unruh Act and other state-law claims.
2. Whether plaintiff must identify the statutory damages sought and provide declarations concerning plaintiff's and counsel's potential status as high-frequency litigants under California law.

HOLDINGS

1. Although supplemental jurisdiction may exist over related state-law claims, a district court has discretion under 28 U.S.C. § 1367(c) to decline to exercise that jurisdiction after considering the circumstances of the case, the nature and governing character of the state-law claims, and their relationship to the federal claims. The court ordered plaintiff to show cause why that discretion should not be exercised here, but did not yet make a final determination declining jurisdiction.
2. The court required plaintiff to identify the amount of statutory damages sought and provide sworn declarations containing facts necessary to determine whether plaintiff and counsel are high-frequency litigants under California law.

KEY QUOTATIONS

“Even if supplemental jurisdiction exists, however, district courts have discretion to decline to exercise supplemental jurisdiction.”

“Failure to respond may, without further warning, result in dismissal of the entire action without prejudice.”

FACTUAL BACKGROUND

The complaint alleged a violation of the federal Americans with Disabilities Act and sought injunctive relief. It also asserted an Unruh Act claim and other state-law claims seeking damages. The court focused on California's heightened pleading, filing-fee, and disclosure requirements for construction-related accessibility claims and high-frequency litigants.

PROCEDURAL HISTORY

The complaint invoked federal-question jurisdiction through an ADA claim and asserted related California claims. Rather than immediately dismissing the state-law claims, the court ordered plaintiff to respond within ten days, identify the statutory damages sought, and submit declarations addressing whether plaintiff and counsel qualify as high-frequency litigants. The order warned that failure to respond could result in dismissal without prejudice and that an inadequate response could lead to declination of supplemental jurisdiction under 28 U.S.C. § 1367(c).

DISPOSITION

other

CASES CITED

- Velez v. Il Fornaio (America) Corp., CV 3:18-1840 CAB (MDD), 2018 WL 6446169, at *6 (S.D. Cal. Dec. 10, 2018)
- City of Chicago v. International College of Surgeons, 522 U.S. 156, 173 (1997)
- Link v. Wabash Railroad Co., 370 U.S. 626, 629-33 (1962)
- Hells Canyon Preservation Council v. U.S. Forest Service, 403 F.3d 683, 689 (9th Cir. 2005)

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