

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Deondre Raglin v. Surendrabhai M. Patel

Raglin v. Patel · No. CV 25-4822-MWF(PVCx) · Decided June 4, 2025

SUMMARY

This is an order to show cause issued by the United States District Court in Deondre Raglin v. Surendrabhai M. Patel. The court directs the plaintiff to explain why it should exercise supplemental jurisdiction over claims under California’s Unruh Civil Rights Act and other state laws, including addressing statutory damages and high-frequency litigant status. A written response was due June 18, 2025, and failure to respond could result in dismissal.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Michael W. Fitzgerald
DECIDED	June 4, 2025
DOCKET	CV 25-4822-MWF(PVCx)
DISPOSITION	other
PROCEDURAL POSTURE	The court sua sponte issued an order to show cause requiring the plaintiff to explain why the court should exercise supplemental jurisdiction over the Unruh Civil Rights Act and other state-law claims.
PRECEDENTIAL VALUE	Unknown; civil minutes order to show cause with no reporter citation.

TOPICS

- subject matter jurisdiction
- civil procedure
- ada / disability
- federalism

PRACTICE AREAS

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

QUESTIONS PRESENTED

1. Whether the court should exercise supplemental jurisdiction over the Unruh Civil Rights Act claim and the other state-law claims.

2. Whether the court may raise subject-matter jurisdiction sua sponte and require plaintiff to show cause concerning the basis for supplemental jurisdiction.

HOLDINGS

1. A federal court may raise and examine the question of subject-matter jurisdiction sua sponte at any time during the pendency of the action.
2. The court did not finally determine whether to exercise supplemental jurisdiction; instead, it ordered plaintiff to show cause why supplemental jurisdiction should be exercised and warned that the court could decline jurisdiction under 28 U.S.C. § 1367(c).

KEY QUOTATIONS

“it is well established that ‘a court may raise the question of subject matter jurisdiction, sua sponte, at any time during the pendency of the action’” (at 1)

“very substantial threat to federal-state comity” (at 1)

FACTUAL BACKGROUND

The complaint alleges a violation of the Americans with Disabilities Act and asserts related claims under California's Unruh Civil Rights Act and other state law. The order indicates that the Unruh Act claim seeks statutory damages and that the court needed facts concerning whether plaintiff or plaintiff's counsel qualified as a high-frequency litigant under California law.

PROCEDURAL HISTORY

Plaintiff filed a complaint asserting an Americans with Disabilities Act claim for injunctive relief, an Unruh Civil Rights Act claim for damages, and other state-law claims. The court determined that supplemental jurisdiction was the sole stated basis for jurisdiction over the Unruh Act claim and ordered plaintiff to respond by June 18, 2025, warning that failure to respond could result in dismissal without prejudice or declining supplemental jurisdiction.

DISPOSITION

other

CASES CITED

- Arroyo v. Rosas, 19 F.4th 1202, 1211-14 (9th Cir. 2021)
- Nevada v. Bank of Am. Corp., 672 F.3d 661, 673 (9th Cir. 2012)
- Snell v. Cleveland, Inc., 316 F.3d 822, 826 (9th Cir. 2002)

OPINION

Deondre Raglin v. Surendrabhai M. Patel

PER CURIAM.

CIVIL MINUTES – GENERAL

Case No. CV 25-4822-MWF(PVCx) Date: June 4, 2025 Title Deondre Raglin v. Surendrabhai M. Patel, et al. Present: The Honorable: MICHAEL W. FITZGERALD, United States District Judge Rita Sanchez Not Reported Deputy Clerk Court Reporter / Recorder Attorneys Present for Plaintiffs: Attorneys Present for Defendants: Not Present Not Present Proceedings: (IN CHAMBERS) ORDER TO SHOW CAUSE RE SUPPLEMENTAL JURISDICTION

The Complaint filed in this action asserts a claim for injunctive relief arising out of an alleged violation of the Americans With Disabilities Act (“ADA”), 42 U.S.C. §§ 12101-12213, a claim for damages pursuant to the Unruh Civil Rights Act (“Unruh Act”), Cal. Civ. Code §§ 51–53, and other state law claims alleged by Plaintiff. The sole basis for jurisdiction over the Unruh Act claim is supplemental jurisdiction pursuant to 28 U.S.C. § 1367(a). The Court, however, may decline to exercise supplemental jurisdiction for the reasons delineated in § 1367(c). See also *Arroyo v. Rosas*, 19 F.4th 1202, 1211–14 (9th Cir. 2021) (holding district courts may decline supplemental jurisdiction over ADA-based Unruh Act claims because of “very substantial threat to federal-state comity” presented by plaintiffs’ use of federal courts to evade California’s Unruh Act reforms). This Court has a sua sponte obligation to confirm that it has subject matter jurisdiction. *Nevada v. Bank of Am. Corp.*, 672 F.3d 661, 673 (9th Cir. 2012) (“[I]t is well established that ‘a court may raise the question of subject matter jurisdiction, sua sponte, at any time during the pendency of the action’” (quoting *Snell v. Cleveland, Inc.*, 316 F.3d 822, 826 (9th Cir. 2002))). Therefore, to assist this Court in its duty, Plaintiff is ORDERED to SHOW CAUSE in writing as to why this Court should exercise supplemental jurisdiction

CIVIL MINUTES – GENERAL

Case No. CV 25-4822-MWF(PVCx) Date: June 4, 2025 Title Deondre Raglin v. Surendrabhai M. Patel, et al. over the Unruh Act claim and the other state law claims alleged by Plaintiff. The Response to the Order to Show Cause shall include (1) the amount of statutory damages sought pursuant to the Unruh Act; and (2) sufficient facts for the Court to determine whether Plaintiff or Plaintiff’s counsel meet the definition of a “high- frequency litigant” as defined in California Code of Civil Procedure section 425.55(b)(1) & (2). These facts shall be set forth in declarations signed under penalty of perjury. The Response shall be filed on or before JUNE 18, 2025. Failure to timely or adequately respond to this Order to Show Cause may, without further warning, result in the dismissal of the entire action without prejudice or the Court’s declining to exercise supplemental jurisdiction over the Unruh Act claim and the dismissal of that claim pursuant to 28 U.S.C. § 1367(c). IT IS SO ORDERED.