

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

Huerta v. CSI Electrical Contractors, Inc.

Huerta · No. 18-cv-06761-BLF · Decided July 23, 2025

SUMMARY

The United States District Court for the Northern District of California dismissed without prejudice Plaintiff’s California Unfair Competition Law claim for lack of equitable jurisdiction. The court held that Plaintiff had an adequate remedy at law through claims under the California Labor Code and declined to partially remand the UCL claim or defer dismissal until the end of the litigation.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Beth Labson Freeman
JURISDICTION	United States District Court for the Northern District of California
DECIDED	July 23, 2025
DOCKET	18-cv-06761-BLF
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court considered the parties' briefing concerning the effect of Sonner on Huerta's California Unfair Competition Law claim and dismissed that claim without prejudice.
PRECEDENTIAL VALUE	unpublished
PARTIES	George Huerta v. CSI Electrical Contractors, Inc.

TOPICS

- subject matter jurisdiction
- equitable relief
- civil procedure
- remedies
- consumer protection

PRACTICE AREAS

- civil procedure
- remedies
- consumer protection
- employment law

QUESTIONS PRESENTED

1. Whether the court had equitable jurisdiction over Huerta's UCL claim when he had an adequate legal remedy through direct California Labor Code claims.

2. Whether the court should partially remand the UCL claim under 28 U.S.C. § 1447(c).
3. Whether dismissal of the UCL claim should be deferred until trial or termination of the action.

HOLDINGS

1. A federal court lacks equitable jurisdiction to hear a UCL claim seeking equitable relief when the plaintiff has an adequate remedy at law; Huerta had such a remedy through direct California Labor Code claims.
2. The court had authority to dismiss the UCL claim without prejudice to refiling the same claim in state court.
3. The court declined to partially remand the UCL claim because the authority permitting such a remand was unclear and Huerta had not shown that dismissal would cause forfeiture of the claim.
4. The court declined to defer dismissal of the UCL claim until after trial or termination of the action.

KEY QUOTATIONS

“Under those federal principles, a plaintiff “must establish that she lacks an adequate remedy at law before securing equitable restitution for past harm under the UCL.”” (at 1)

““Equitable jurisdiction is distinct from subject matter jurisdiction[.]”” (at 2)

“Given the lack of clear authority permitting partial remand of Plaintiff’s UCL claim, and Plaintiffs lack of preference, the Court finds it most appropriate to dismiss the UCL claim without prejudice.” (at 3)

FACTUAL BACKGROUND

Huerta's UCL claim was grounded on alleged violations of the California Labor Code. The same alleged violations were also asserted through direct California Labor Code claims, providing an asserted legal remedy. Huerta did not argue that dismissal of the UCL claim would cause forfeiture of the claim in state court and stated that he did not care whether the court partially remanded or dismissed the claim without prejudice.

PROCEDURAL HISTORY

Huerta asserted legal claims under the California Labor Code and a UCL claim in federal court. The parties agreed that the court lacked equitable jurisdiction over the UCL claim but disagreed whether the claim should be partially remanded, dismissed without prejudice, or left pending until the end of the litigation. The court dismissed the UCL claim without prejudice and discharged its order to show cause.

DISPOSITION

dismissed

CASES CITED

- Sonner v. Premier Nutrition Corp., 971 F.3d 834 (9th Cir. 2020)
- Guzman, 49 F.4th at 1310, 1314-15

- Lee v. American National Insurance Co., 260 F.3d 997, 1006-07 & n.8 (9th Cir. 2001)
- California v. N. Tr. Corp., No. CV 12-01813 DMG (FMOx), 2013 WL 1561460, at *6 (C.D. Cal. Apr. 10, 2013)
- Kim, No. 196919, at *3 (C.D. Cal. Jan. 13, 2023)
- Johnson v. Nissan N. Am., Inc., No. 3:17-CV-00517-WHO, 2022 WL 2869528, at *17 (N.D. Cal. July 21, 2022)

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