

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Edmond Neal v. Libazi, Inc., et al.

Edmond Neal · No. CV 25-4400 PA (BFMx) · Decided May 19, 2025

SUMMARY

The Central District of California issued an order to show cause concerning supplemental jurisdiction over claims under California’s Unruh Civil Rights Act and any other state-law claims in the complaint. The court directed the plaintiff to identify the statutory damages sought and required declarations addressing whether the plaintiff and counsel qualify as high-frequency litigants under California law, with a response due June 2, 2025.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Percy Anderson
JURISDICTION	United States District Court for the Central District of California
DECIDED	May 19, 2025
DOCKET	CV 25-4400 PA (BFMx)
DISPOSITION	other
PROCEDURAL POSTURE	The court issued an order to show cause sua sponte after reviewing a complaint asserting an Americans with Disabilities Act claim and a California Unruh Civil Rights Act claim.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Edmond Neal v. Libazi, Inc., et al.

TOPICS

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

PRACTICE AREAS

- civil procedure
- supplemental jurisdiction
- Americans with Disabilities Act
- California civil rights law

QUESTIONS PRESENTED

1. Whether the district court should exercise supplemental jurisdiction over the Unruh Act claim and any other state-law claims alleged in the complaint.
2. What information plaintiff and plaintiff's counsel must provide regarding the statutory damages sought and whether they satisfy California's definition of a high-frequency litigant.

KEY QUOTATIONS

“The supplemental jurisdiction statute “reflects the understanding that, when deciding whether to exercise supplemental jurisdiction, ‘a federal court should consider and weigh in each case, and at every stage of the litigation, the values of judicial economy, convenience, fairness, and comity.’””

“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 declining to exercise supplemental jurisdiction over the Unruh Act and other state law claims, if any, and the dismissal of any such claims pursuant to 28 U.S.C. § 1367(c).”

FACTUAL BACKGROUND

The complaint alleges a violation of the Americans with Disabilities Act and seeks injunctive relief. It also asserts a California Unruh Civil Rights Act claim for damages, along with any other state-law claim that may have been alleged.

PROCEDURAL HISTORY

Plaintiff filed a complaint seeking injunctive relief under the ADA and damages under the Unruh Act. The district court ordered plaintiff to explain why the court should exercise supplemental jurisdiction over the Unruh Act and any other state-law claims, and required information concerning statutory damages and high-frequency-litigant status.

DISPOSITION

other

CASES CITED

- City of Chicago v. International College of Surgeons, 522 U.S. 156, 173, 118 S. Ct. 523, 534, 139 L. Ed. 2d 525 (1997)
- Carnegie-Mellon University v. Cohill, 484 U.S. 343, 350, 108 S. Ct. 614, 619, 98 L. Ed. 2d 720 (1988)