

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Theresa Brooke v. Carpinteria Motor Inn, Inc.

Brooke · No. 2:25-cv-03313-RGK-E · Decided June 6, 2025

SUMMARY

The United States District Court for the Central District of California ordered the plaintiff to show cause why the court should exercise supplemental jurisdiction over claims under California’s Unruh Civil Rights Act and any other state-law claims. The order also requires identification of the statutory damages sought and declarations addressing whether the plaintiff and counsel qualify as high-frequency litigants under California law, with a response due June 13, 2025.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Gary Klausner
JURISDICTION	United States District Court for the Central District of California
DECIDED	June 6, 2025
DOCKET	2:25-cv-03313-RGK-E
DISPOSITION	other
PROCEDURAL POSTURE	The district court issued an order to show cause directing plaintiff to explain why the court should exercise supplemental jurisdiction over the California Unruh Civil Rights Act claim and any other state-law claims.
STANDARD OF REVIEW	The court must consider and weigh judicial economy, convenience, fairness, and comity when deciding whether to exercise supplemental jurisdiction, and may decline supplemental jurisdiction under 28 U.S.C. § 1367(c).
PRECEDENTIAL VALUE	Nonprecedential interlocutory district-court order
PARTIES	Theresa Brooke v. Carpinteria Motor Inn, Inc.

TOPICS

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

PRACTICE AREAS

Civil procedure

Americans with Disabilities Act

Civil rights

Supplemental jurisdiction

Unruh Civil Rights Act

QUESTIONS PRESENTED

1. Whether plaintiff should show cause why the district court should exercise supplemental jurisdiction over the Unruh Civil Rights Act claim and any other state-law claims.
2. What information plaintiff must provide to permit the court to evaluate supplemental jurisdiction and the statutory high-frequency-litigant provisions.

HOLDINGS

1. Because the complaint appeared to present a federal ADA claim and state-law claims over which the court possessed only supplemental jurisdiction, the court ordered plaintiff to show cause why it should exercise supplemental jurisdiction over the Unruh Act claim and any other state-law claim asserted.
2. Plaintiff must identify the amount of statutory damages sought and plaintiff and plaintiff's counsel must submit declarations under penalty of perjury containing facts necessary to determine whether plaintiff satisfies 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 claim under California's Unruh Civil Rights Act seeking damages. The order does not resolve the factual merits of either claim.

PROCEDURAL HISTORY

Plaintiff filed a complaint asserting an Americans with Disabilities Act claim for injunctive relief and a California Unruh Civil Rights Act claim for damages. The court concluded that it appeared to possess only supplemental jurisdiction over the state-law claims and ordered plaintiff to show cause regarding the exercise of that jurisdiction, the amount of statutory damages sought, and plaintiff's possible status as a high-frequency litigant.

DISPOSITION

other

CASES CITED

- City of Chicago v. International College of Surgeons, 522 U.S. 156, 173 (1997)
- Carnegie-Mellon University v. Cohill, 484 U.S. 343, 350 (1988)

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