

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Jesus Garcia v. Galaxy Party and Decors LLC, et al.

Garcia v. Galaxy Party · No. CV 25-10499-MWF(SKx) · Decided December 11, 2025

SUMMARY

The court issued an order to show cause questioning whether it should exercise supplemental jurisdiction over the plaintiff’s Unruh Civil Rights Act and other state-law claims in an action involving alleged violations of the Americans with Disabilities Act. The order requires the plaintiff to provide the amount of Unruh Act damages sought and declarations addressing whether the plaintiff or counsel qualifies as a high-frequency litigant under California law, with a response due December 29, 2025.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Michael W. Fitzgerald
JURISDICTION	United States District Court
DECIDED	December 11, 2025
DOCKET	CV 25-10499-MWF(SKx)
DISPOSITION	other
PROCEDURAL POSTURE	The district court issued an order to show cause requiring Plaintiff to explain why the court should exercise supplemental jurisdiction over the Unruh Civil Rights Act claim and other state-law claims.
PRECEDENTIAL VALUE	Unknown; civil minutes order to show cause

TOPICS

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

PRACTICE AREAS

- Civil procedure
- Americans with Disabilities Act
- Supplemental jurisdiction
- 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 should obtain information regarding the statutory damages sought and Plaintiff's or counsel's potential status as a high-frequency litigant before deciding whether to exercise supplemental jurisdiction.

HOLDINGS

1. The court recognized that it has a sua sponte obligation to confirm that subject matter jurisdiction exists and may raise the issue at any time while the action is pending.
2. The court recognized that it may decline to exercise supplemental jurisdiction for the reasons identified in 28 U.S.C. § 1367(c), including the substantial federal-state comity concerns identified by the Ninth Circuit for ADA-based Unruh Act claims.

KEY QUOTATIONS

“a court may raise the question of subject matter jurisdiction, sua sponte, at any time during the pendency of the action” (Order to Show Cause)

FACTUAL BACKGROUND

The complaint alleges a violation of the Americans with Disabilities Act and seeks injunctive relief. It also asserts a claim for damages under the California Unruh Civil Rights Act and other state-law claims, with supplemental jurisdiction identified as the sole basis for federal jurisdiction over those claims. The court requested information concerning the amount of Unruh Act statutory damages and whether Plaintiff or counsel qualifies as a high-frequency litigant under California law.

PROCEDURAL HISTORY

Plaintiff filed a complaint asserting an ADA claim for injunctive relief, an Unruh Civil Rights Act claim for damages, and other state-law claims. The court sua sponte questioned its supplemental jurisdiction and ordered Plaintiff to submit a written response by December 29, 2025, warning that failure to respond could result in dismissal without prejudice or declining supplemental jurisdiction over the state-law claims.

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

Jesus Garcia v. Galaxy Party and Decors LLC, et al.

PER CURIAM.

CIVIL MINUTES – GENERAL

Case No. CV 25-10499-MWF(SKx) Date: December 11, 2025 Title Jesus Garcia v. Galaxy Party and Decors LLC, 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 25-10499-MWF(SKx) Date: December 11, 2025 Title Jesus Garcia v. Galaxy Party and Decors LLC, 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 DECEMBER 29, 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.

