

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Maguire Properties 755 S Fig LLC v. Donovan Grant

Maguire Properties · No. 2:25-cv-06308-CAS-RAOx · Decided July 17, 2025

SUMMARY

The United States District Court for the Central District of California issued an order to show cause concerning subject matter jurisdiction over a removed unlawful detainer action. The court noted that unlawful detainer claims are matters of state law and ordered the defendant to explain why the case should not be remanded to Los Angeles County Superior Court.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Christina A. Snyder
JURISDICTION	United States District Court for the Central District of California
DECIDED	July 17, 2025
DOCKET	2:25-cv-06308-CAS-RAOx
DISPOSITION	other
PROCEDURAL POSTURE	Defendant removed a state-court unlawful detainer action to federal district court and asserted federal-question jurisdiction. The district court issued an order to show cause why the action should not be remanded for lack of subject matter jurisdiction.
PRECEDENTIAL VALUE	Nonprecedential district court order to show cause

TOPICS

- subject matter jurisdiction
- eviction
- landlord tenant
- civil procedure

PRACTICE AREAS

- civil procedure
- real estate
- landlord tenant

QUESTIONS PRESENTED

- Whether the federal district court had subject matter jurisdiction over a removed action asserting only a state-law unlawful detainer claim.

HOLDINGS

1. An unlawful detainer action asserting only a state-law claim does not invoke federal-question jurisdiction and is ordinarily within the province of state court.

KEY QUOTATIONS

“*Unlawful detainer actions are strictly within the province of state court.*”

“*[T]he complaint only asserts a claim for unlawful detainer, a cause of action that is purely a matter of state law.*”

FACTUAL BACKGROUND

Maguire Properties 755 S Fig LLC filed an unlawful detainer action against Donovan Grant in Los Angeles County Superior Court. Grant removed the action to federal court and asserted federal-question jurisdiction. The complaint asserted only a state-law unlawful detainer claim.

PROCEDURAL HISTORY

Plaintiff filed an unlawful detainer action against defendant in Los Angeles County Superior Court on February 24, 2025. Defendant removed the action to the Central District of California on July 10, 2025, asserting jurisdiction under 28 U.S.C. §§ 1331 and 1441. The district court found that federal jurisdiction appeared lacking and ordered defendant to show cause in writing by July 31, 2025, why the case should not be remanded.

DISPOSITION

other

REMAND INSTRUCTIONS

Defendant was ordered to show cause in writing on or before July 31, 2025, why the case should not be remanded to Los Angeles County Superior Court.

CASES CITED

- Federal Nat'l Mort. Assoc. v. Suarez, 2011 U.S. Dist. LEXIS 82300, *6 (E.D. Cal. July 27, 2011)
- Deutsche Bank Nat'l Trust Co. v. Leonardo, 2011 U.S. Dist. LEXIS 83854, *2 (C.D. Cal. Aug. 1, 2011)

OPINION

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA CIVIL MINUTES — GENERAL Case No. 2:25-cv-06308-CAS-RAOx Date July 17, 2025 Title Maguire Properties 755 S Fig LLC v. Donovan Grant Present: The Honorable CHRISTINA A. SNYDER Catherine Jeang Not Present N/A Deputy Clerk Court Reporter / Recorder Tape No. Attorneys Present for Plaintiffs: Attorneys Present for Defendants: Not Present Not Present Proceedings: (IN CHAMBERS) - ORDER TO SHOW CAUSE RE: SUBJECT MATTER

JURISDICTION On February 24, 2025, plaintiff Maguire Properties 755 S Fig LLC (“plaintiff”) filed this unlawful detainer action against defendant Donovan Grant (“defendant”) in Los Angeles County Superior Court.

Dkt. 1 at 10. Defendant removed the case to this Court on July 10, 2025. Id. at 1. Defendant concurrently filed a request to proceed in forma pauperis. Dkt. 2. Defendant asserts that this Court has jurisdiction on the basis of a federal question. Dkt. | at 3 (citing 28 U.S.C. § 1331 and § 1441). It appears that this Court lacks subject matter jurisdiction over this action.

The law is clear that “[u]nlawful detainer actions are strictly within the province of state court.” Federal Nat’l Mort. Assoc. v. Suarez, 2011 U.S. Dist. LEXIS 82300, *6 (E.D. Cal. Jul. 27, 2011); Deutsche Bank Nat’l Trust Co. v. Leonardo, 2011 U.S. Dist. LEXIS 83854, *2 (C.D. Cal. Aug. 1, 2011) (“[T]he complaint only asserts a claim for unlawful detainer, a cause of action that is purely a matter of state law.”).

Here, the only claim asserted by plaintiff is for unlawful detainer against defendant. See dkt. 1 at 10. Accordingly, defendant is hereby ORDERED TO SHOW CAUSE, in writing, on or before July 31, 2025, why this case should not be remanded to Los Angeles County Superior Court. IT IS SO ORDERED. 00: 00 Initials of Preparer CMI