

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Michael Rhambo v. Butterfly Spa, et al.

Rhambo v. Butterfly Spa · No. CV 25-9125 PA (PDx) · Decided October 8, 2025

SUMMARY

The United States District Court for the Central District of California orders 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 court also requires the plaintiff and counsel to provide declarations concerning high-frequency-litigant status and to identify the statutory damages sought, warning that failure to respond may result in dismissal.

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	October 8, 2025
DOCKET	CV 25-9125 PA (PDx)
DISPOSITION	other
PROCEDURAL POSTURE	The district court issued an order to show cause after the filing of a complaint asserting an Americans with Disabilities Act claim for injunctive relief and a California Unruh Civil Rights Act claim for damages.
PRECEDENTIAL VALUE	Nonprecedential interlocutory district-court order
PARTIES	Michael Rhambo v. Butterfly Spa, et al.

TOPICS

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

PRACTICE AREAS

- Civil procedure
- Americans with Disabilities Act
- California civil rights law

QUESTIONS PRESENTED

1. Whether the court should exercise supplemental jurisdiction over the Unruh Act claim and any other state-law claims under 28 U.S.C. §§ 1367(a) and 1367(c).
2. What amount of statutory damages plaintiff seeks and whether plaintiff and counsel satisfy California's definition of a high-frequency litigant.

HOLDINGS

1. The court ordered plaintiff to show cause in writing why the court should exercise supplemental jurisdiction over the Unruh Act claim and any other state-law claim asserted in the complaint.
2. The court required plaintiff to identify the amount of statutory damages sought and required plaintiff and plaintiff's counsel to submit declarations under penalty of perjury containing facts necessary to determine whether they satisfy California's high-frequency-litigant definition.

KEY QUOTATIONS

“The Court therefore orders plaintiff to show cause in writing why the Court should exercise supplemental jurisdiction over the Unruh Act claim and any other state law claim asserted in the Complaint.”

FACTUAL BACKGROUND

The complaint alleges a violation of the Americans with Disabilities Act and seeks injunctive relief. It also seeks damages under California's Unruh Civil Rights Act, along with any other state-law relief alleged in the complaint.

PROCEDURAL HISTORY

Plaintiff filed a complaint alleging an ADA claim and state-law claims, including an Unruh Act claim. Before resolving whether to exercise supplemental jurisdiction over the state-law claims, the court ordered plaintiff to submit a written response addressing supplemental jurisdiction, statutory damages, and whether plaintiff and counsel qualify as high-frequency litigants.

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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