

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Mario Mendoza v. Ann Miller, et al.

Mendoza v. Miller · No. 2:25-cv-11376-DSF-AJR · Decided December 16, 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 order requires the plaintiff and counsel to submit declarations addressing whether they qualify as high-frequency litigants and to identify the statutory damages sought, with a response due December 30, 2025.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Dale S. Fischer
JURISDICTION	United States District Court for the Central District of California
DECIDED	December 16, 2025
DOCKET	2:25-cv-11376-DSF-AJR
DISPOSITION	other
PROCEDURAL POSTURE	The court issued an order to show cause directing the plaintiff to explain why the court should exercise supplemental jurisdiction over claims under California's Unruh Civil Rights Act and any other state-law claims.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

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

PRACTICE AREAS

- civil procedure
- civil rights
- Americans with Disabilities Act
- supplemental jurisdiction
- California Unruh Civil Rights Act

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(c).
2. Whether plaintiff and plaintiff's counsel qualify as high-frequency litigants under California Civil Procedure Code § 425.55(b)(1) and (2).

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.”

“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 seeks damages under California's Unruh Civil Rights Act. The court noted that California has special pleading and filing-fee requirements for certain high-frequency litigants bringing construction-related disability-access claims, and requested facts bearing on whether plaintiff and counsel fall within that statutory definition.

PROCEDURAL HISTORY

Plaintiff filed a complaint asserting an ADA claim for injunctive relief and an Unruh Act claim for damages. The court determined that it appeared to possess only supplemental jurisdiction over the state-law claims and ordered plaintiff to respond, identify the statutory damages sought, and provide declarations addressing whether plaintiff and counsel qualify as high-frequency litigants under California law. The court had not yet ruled on whether to exercise supplemental jurisdiction or dismiss any claim.

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)
- Vo v. Choi, 49 F.4th 1167 (9th Cir. 2022)
- Arroyo v. Rosas, 19 F.4th 1202 (9th Cir. 2021)