

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Julio Cruz v. Charles D. Burrus, et al.

Cruz v. Burrus · No. 8:25-00442 ADS · Decided June 5, 2025

SUMMARY

The United States District Court for the Central District of California ordered Plaintiff Julio Cruz to show cause why the court should exercise supplemental jurisdiction over his state law claims in an ADA and Unruh Civil Rights Act action. The court cited 28 U.S.C. § 1367(c), Arroyo v. Rosas, and Vo v. Choi, and required Plaintiff to identify the statutory damages sought and provide information relevant to California’s high-frequency litigant requirements.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Autumn D. Spaeth
JURISDICTION	United States District Court for the Central District of California
DECIDED	June 5, 2025
DOCKET	8:25-00442 ADS
DISPOSITION	other
PROCEDURAL POSTURE	The court issued an order to show cause requiring the plaintiff to explain why the court should exercise supplemental jurisdiction over state-law claims accompanying an Americans with Disabilities Act claim.
STANDARD OF REVIEW	Supplemental jurisdiction is discretionary, and a district court may decline to exercise it under 28 U.S.C. § 1367(c), including where exceptional circumstances provide compelling reasons for declining jurisdiction.
PRECEDENTIAL VALUE	Unknown; district court civil minutes order

TOPICS

- subject matter jurisdiction
- civil procedure
- ada / disability

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the plaintiff should be required to show cause why the district court should exercise supplemental jurisdiction over the state-law claims.
2. Whether the asserted ADA and Unruh Act claims may present exceptional circumstances supporting declination of supplemental jurisdiction because of California procedural requirements governing high-frequency litigants.

HOLDINGS

1. Supplemental jurisdiction is discretionary rather than a plaintiff's right, and a district court may decline to exercise it when one of the circumstances identified in 28 U.S.C. § 1367(c) is present.
2. ADA and Unruh Act cases may present exceptional circumstances warranting declination of supplemental jurisdiction over state-law claims where litigants may be circumventing California procedural requirements designed to limit such litigation.

KEY QUOTATIONS

“supplemental jurisdiction “is a doctrine of discretion, not of plaintiff’s right.”” (383 U.S. at 726)

FACTUAL BACKGROUND

Julio Cruz sued Charles D. Burrus, doing business as Mini Local Storage and as trustee of the Charles D. Burrus Family Trust, along with unnamed defendants. The complaint asserts an ADA claim seeking injunctive relief, as well as claims under California's Unruh Civil Rights Act, the Disabled Persons Act, and other state laws seeking statutory damages. Cruz alleged federal-question jurisdiction over the ADA claim and supplemental jurisdiction over the state-law claims.

PROCEDURAL HISTORY

Plaintiff filed suit alleging claims under the ADA, California's Unruh Civil Rights Act, and other state laws. Plaintiff invoked federal-question jurisdiction for the ADA claim and supplemental jurisdiction for the state-law claims. The district court ordered plaintiff to show cause why supplemental jurisdiction should be exercised and required information concerning the statutory damages sought and whether plaintiff and counsel qualify as high-frequency litigants under California law.

DISPOSITION

other

CASES CITED

- United Mine Workers v. Gibbs, 383 U.S. 715, 726 (1966)
- Arroyo v. Rosas, 19 F.4th 1202, 1205, 1211 (9th Cir. 2021)

- Vo v. Choi, 49 F.4th 1167, 1171, 1174 (9th Cir. 2022)

OPINION

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA CIVIL MINUTES – GENERAL Case No.: 8:25-00442 ADS Date: June 5, 2025 Title: Julio Cruz v. Charles D. Burrus, et al. Present: The Honorable Autumn D. Spaeth, United States Magistrate Judge Kristee Hopkins None Reported Deputy Clerk Court Reporter / Recorder Attorney(s) Present for Plaintiff(s): Attorney(s) Present for Defendant(s): None Present None Present Proceedings: (IN CHAMBERS) ORDER TO SHOW CAUSE RE: SUPPLEMENTAL JURISDICTION In this case, Plaintiff Julio Cruz alleges claims against Defendants Charles D. Burrus d/b/a Mini Local Storage, as Trustee of the Charles D. Burrus Family Trust, and unnamed Does under the Americans with Disabilities Act (“ADA”), California’s Unruh Civil Rights Act (“Unruh Act”), and other state law claims.

(Dkt. No. 1 (“Compl.”).) Plaintiff seeks injunctive relief under the ADA and statutory damages under the Unruh Act and Disabled Persons Act. Plaintiff contends that the Court has federal question jurisdiction over the ADA claim and supplemental jurisdiction over the state law claims. (Compl. ¶¶ 6-7.) State law claims may be brought in federal court under the doctrine of supplemental jurisdiction.

Supplemental jurisdiction “is a doctrine of discretion, not of plaintiff’s right.” *United Mine Workers v. Gibbs*, 383 U.S. 715, 726 (1966). District courts have discretion to decline to exercise supplemental jurisdiction if: “(1) the claim raises a novel or complex issue of State law, (2) the claim substantially predominates over the claim or claims over which the district court has original jurisdiction, (3) the district court has dismissed all claims over which it has original jurisdiction, or (4) in exceptional circumstances, there are other compelling reasons for declining jurisdiction.” 28 U.S.C. § 1367(c).

The Ninth Circuit has found that ADA/Unruh cases such as this one can present exceptional circumstances that warrant the declination of supplemental jurisdiction UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA CIVIL MINUTES – GENERAL Case No.: 8:25-00442 ADS Date: June 5, 2025 Title: Julio Cruz v. Charles D. Burrus, et al. over state law claims.

Arroyo v. Rosas, 19 F.4th 1202, 1205, 1211 (9th Cir. 2021) (finding exceptional circumstances where generally litigants filing ADA/Unruh cases in federal court were circumventing California procedural requirements specifically designed to limit litigation); see also *Vo v. Choi*, 49 F.4th 1167, 1171, 1174 (9th Cir. 2022) (affirming district court’s declination of supplemental jurisdiction in an ADA/Unruh case, where litigants evaded California procedural requirements and the declination “best served the principles of economy, convenience, fairness, and comity”).

Plaintiff is ORDERED TO SHOW CAUSE why supplemental jurisdiction should be exercised by the Court over the state law claims. Plaintiff must file a response to this Order to Show Cause by July 7, 2025. In the response, Plaintiff shall identify the amount of statutory damages being sought. Plaintiff and counsel shall also include declarations in the response which provide all facts necessary for the Court to determine if they satisfy the definition of a “high- frequency litigant” as provided by California Civil Procedure Code §§ 425.55(b)(1) & (2).

Failure to respond to this Order may result in the Court declining to exercise supplemental jurisdiction over Plaintiff’s state law claims. IT IS SO ORDERED. Initials of Clerk kh