

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)

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