

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Kishore K. Tangirala v. Wendy Espinoza

Tangirala v. Espinoza · No. 2:25-cv-08954-CAS-KSx · Decided October 7, 2025

SUMMARY

The United States District Court for the Central District of California issues an order to show cause regarding subject matter jurisdiction in a removed unlawful detainer action. The court explains that unlawful detainer claims arise under state law and orders the defendant to show cause 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	October 7, 2025
DOCKET	2:25-cv-08954-CAS-KSx
DISPOSITION	other
PROCEDURAL POSTURE	Defendant removed an unlawful detainer action from Los Angeles County Superior Court based on 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.
STANDARD OF REVIEW	The district court independently examined whether subject matter jurisdiction existed and whether removal was proper.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Wendy Espinoza v. Kishore K. Tangirala

TOPICS

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

PRACTICE AREAS

- civil procedure
- real estate
- landlord tenant

QUESTIONS PRESENTED

1. Whether the federal district court had subject matter jurisdiction over a removed action asserting only a state-law unlawful detainer claim.
2. Whether defendants should be required to show cause why the action should not be remanded to Los Angeles County Superior Court.

HOLDINGS

1. An unlawful detainer action is strictly within the province of state court and, when the complaint asserts only unlawful detainer, does not establish federal-question jurisdiction under 28 U.S.C. § 1331.

KEY QUOTATIONS

“the complaint only asserts a claim for unlawful detainer, a cause of action that is purely a matter of state law.”” (at 1)

FACTUAL BACKGROUND

Kishore K. Tangirala filed an unlawful detainer action against Wendy Espinoza and Does 1-10 in Los Angeles County Superior Court. Espinoza removed the action to federal court and asserted federal-question jurisdiction, but the complaint alleged only an unlawful detainer claim.

PROCEDURAL HISTORY

Plaintiff filed an unlawful detainer action in Los Angeles County Superior Court on July 28, 2025. Defendant Wendy Espinoza removed the case to the Central District of California on September 19, 2025, asserting jurisdiction under 28 U.S.C. §§ 1331 and 1441. The district court concluded that subject matter jurisdiction appeared lacking and ordered defendants to show cause by October 21, 2025, why the case should not be remanded.

DISPOSITION

other

REMAND INSTRUCTIONS

Defendants were ordered to show cause in writing on or before October 21, 2025, why the case should not be remanded to Los Angeles County Superior Court. The order did not itself enter a final remand.

CASES CITED

- 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)