

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Robert Mena v. Poppi Johnson LLC et al.

Mena v. Poppi Johnson LLC · No. 8:25-cv-02589-MRA-KES · Decided December 23, 2025

SUMMARY

The United States District Court for the Central District of California orders Plaintiff Robert Mena to show cause why the Court should exercise supplemental jurisdiction over his California state-law claims. The order focuses on California’s procedural restrictions on construction-related accessibility claims and high-frequency litigants, and on the considerations governing supplemental jurisdiction under 28 U.S.C. § 1367(c). Plaintiff must identify the statutory damages sought and submit declarations addressing the litigation histories of Plaintiff and Plaintiff’s counsel.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Monica Ramirez Almadani
JURISDICTION	United States District Court, Central District of California
DECIDED	December 23, 2025
DOCKET	8:25-cv-02589-MRA-KES
DISPOSITION	other
PROCEDURAL POSTURE	After Plaintiff filed a federal ADA claim and related California state-law claims, the district court issued an order to show cause why it should exercise supplemental jurisdiction over the state-law claims.
STANDARD OF REVIEW	Supplemental jurisdiction under 28 U.S.C. § 1367 is discretionary; the court must consider the statutory grounds for declining jurisdiction and weigh judicial economy, convenience, fairness, and comity.
PRECEDENTIAL VALUE	Nonprecedential district court order; precedential status not otherwise specified in the source.

TOPICS

- subject matter jurisdiction
- civil procedure
- pleadings
- ada / disability
- remedies

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the district court should exercise supplemental jurisdiction over Plaintiff's Unruh Act and related California state-law claims.
2. Whether the court should require Plaintiff and counsel to provide information necessary to determine whether they qualify as high-frequency litigants under California law.

HOLDINGS

1. Supplemental jurisdiction is discretionary rather than mandatory, and a federal court may decline to exercise it when one of the grounds identified in 28 U.S.C. § 1367(c) is present, while considering judicial economy, convenience, fairness, and comity.
2. Before deciding whether to exercise supplemental jurisdiction, the court may require Plaintiff and counsel to submit declarations and other information bearing on their status as high-frequency litigants under California Code of Civil Procedure section 425.55.

KEY QUOTATIONS

“The supplemental jurisdiction statute enumerates the following situations in which a district court can decline to exercise supplemental jurisdiction:” (at 172)

“a federal court should consider and weigh in each case, and at every stage of litigation, the values of judicial economy, convenience, fairness, and comity.” (at 173)

“a confluence of several California-law rules ha[s] combined to create a highly unusual systemic impact on ADA-based Unruh Act cases that clearly threatens to have a significant adverse impact on federal-state comity.” (at 1211)

FACTUAL BACKGROUND

Plaintiff Robert Mena sued Poppi Johnson LLC, M-L Partnership, and Doe defendants, alleging disability-accessibility violations and related state-law claims. The federal claim arose under the ADA, while the state claims sought damages and, for some claims, injunctive relief. The order focused on California's statutory restrictions and procedural reforms concerning construction-related accessibility claims and high-frequency litigants.

PROCEDURAL HISTORY

Robert Mena filed the action on November 18, 2025, asserting an ADA claim for injunctive relief and state-law claims under the Unruh Civil Rights Act, the California Disabled Persons Act, California Health and Safety Code section 19955 et seq., and negligence. The court had not yet finally resolved supplemental jurisdiction and ordered Plaintiff to respond within 14 days with information concerning statutory damages and whether Plaintiff or counsel qualified as high-frequency litigants under California law. The court warned that failure to respond could result in declining supplemental jurisdiction over the Unruh Act and related state-law claims.

DISPOSITION

other

CASES CITED

- City of Chicago v. International College of Surgeons, 522 U.S. 156, 172-73 (1997)
- United Mine Workers of America v. Gibbs, 383 U.S. 715, 726 (1966)
- Arroyo v. Rosas, 19 F.4th 1202, 1207, 1211-12 (9th Cir. 2021)
- Whitaker v. Mac, 411 F. Supp. 3d 1108, 1116 (C.D. Cal. 2019)
- Schutza v. Cuddeback, 262 F. Supp. 3d 1025, 1031 (S.D. Cal. 2017)
- Carnegie-Mellon University v. Cohill, 484 U.S. 343, 350 (1988)

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