

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Latanya Williams v. Balbina Gazga Galindez

Williams v. Galindez · No. CV 25-3648 PA (MBKx) · Decided April 28, 2025

SUMMARY

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 court also requires the plaintiff and counsel to provide declarations addressing whether they qualify as high-frequency litigants and to identify the statutory damages sought.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Percy Anderson
JURISDICTION	United States District Court for the Central District of California
DECIDED	April 28, 2025
DOCKET	CV 25-3648 PA (MBKx)
DISPOSITION	other
PROCEDURAL POSTURE	The district court issued an order to show cause at the pleading stage concerning whether it should exercise supplemental jurisdiction over the plaintiff's Unruh Civil Rights Act claim and any other state-law claims.
PRECEDENTIAL VALUE	Unpublished interlocutory district-court order; limited precedential value.
PARTIES	Latanya Williams v. Balbina Gazga Galindez

TOPICS

- subject matter jurisdiction
- civil procedure
- public accommodations discrimination
- damages

PRACTICE AREAS

- Civil procedure
- Americans with Disabilities Act
- California Unruh Civil Rights Act
- Federal jurisdiction

QUESTIONS PRESENTED

1. Whether the plaintiff should show cause why the district court should exercise supplemental jurisdiction over the Unruh Civil Rights Act claim and any other state-law claims.
2. What information plaintiff and plaintiff's counsel must provide to permit the court to determine whether they satisfy California's definition of a high-frequency litigant.

HOLDINGS

1. Because it appeared that the court possessed only supplemental jurisdiction over the Unruh Civil Rights Act claim and any other state-law claims, the court ordered plaintiff to show cause in writing why supplemental jurisdiction should be exercised.
2. The court required plaintiff to identify the amount of statutory damages sought and required plaintiff and counsel to submit declarations under penalty of perjury containing facts necessary to determine whether they satisfy California's definition of a high-frequency litigant.

KEY QUOTATIONS

“The supplemental jurisdiction statute “reflects the understanding that, when deciding whether to exercise supplemental jurisdiction, ‘a federal court should consider and weigh in each case, and at every stage of the litigation, the values of judicial economy, convenience, fairness, and comity.’””

FACTUAL BACKGROUND

The complaint alleges a violation of the Americans with Disabilities Act and seeks injunctive relief. It also asserts a claim for damages under California's Unruh Civil Rights Act and potentially other state-law claims. The order does not resolve the merits of those claims or make factual findings regarding the alleged ADA violation.

PROCEDURAL HISTORY

Plaintiff filed a complaint asserting an ADA claim for injunctive relief and a California Unruh Civil Rights Act claim for damages. The court determined that it appeared to possess only supplemental jurisdiction over the state-law claims and ordered plaintiff to explain why supplemental jurisdiction should be exercised. The court also required plaintiff and counsel to submit declarations addressing whether they qualify as high-frequency litigants and required identification of the statutory damages sought.

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)

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