

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Miriam Maldonado v. Megdal Downey LLC

Maldonado v. Megdal Downey LLC · No. 2:25-cv-06635-WLH-MAR · Decided August 20, 2025

SUMMARY

The United States District Court for the Central District of California ordered the plaintiff to show cause why the court should exercise supplemental jurisdiction over claims under California’s Unruh Civil Rights Act and related state-law claims. The court directed the plaintiff and counsel to identify the statutory damages sought and provide declarations addressing whether they qualify as high-frequency litigants, warning that failure to respond could result in dismissal of the state-law claims.

CASE DETAILS

COURT	United States District Court for the Central District of California
JURISDICTION	United States District Court for the Central District of California
DECIDED	August 20, 2025
DOCKET	2:25-cv-06635-WLH-MAR
DISPOSITION	other
PROCEDURAL POSTURE	The district court issued an order to show cause requiring Plaintiff to explain why the court should exercise supplemental jurisdiction over the California Unruh Civil Rights Act claim and related 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PRECEDENTIAL VALUE	Unpublished district court order; precedential status unknown and no reporter citation appears.

TOPICS

- subject matter jurisdiction
- civil procedure
- ada / disability
- public accommodations discrimination
- pleadings

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the court should exercise supplemental jurisdiction over Plaintiff's Unruh Civil Rights Act claim and any related state-law claims.
2. What information Plaintiff and counsel must provide for the court to evaluate whether declining supplemental jurisdiction is warranted under 28 U.S.C. § 1367(c).

HOLDINGS

1. Supplemental jurisdiction over state-law claims is discretionary rather than a plaintiff's right, and the court may decline jurisdiction under the circumstances specified in 28 U.S.C. § 1367(c), while weighing judicial economy, convenience, fairness, and comity.
2. Plaintiff must show cause in writing why the court should exercise supplemental jurisdiction over the Unruh Act claim and related state-law claims, identify the statutory damages sought, and provide declarations addressing the high-frequency-litigant criteria.

KEY QUOTATIONS

“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.” (at 2)

“the Court finds it would be improper to allow Plaintiff [a high frequency litigant] to use federal court as an end-around to California’s pleading requirements.” (at 3)

FACTUAL BACKGROUND

The complaint alleges a violation of the Americans with Disabilities Act and seeks injunctive relief. It also seeks damages under California's Unruh Civil Rights Act, apparently based on alleged disability-access barriers. The court noted California's statutory efforts to curb allegedly baseless or vexatious disability-access litigation, including heightened pleading requirements and a high-frequency litigant fee.

PROCEDURAL HISTORY

Plaintiff filed a complaint asserting an Americans with Disabilities Act claim for injunctive relief and an Unruh Civil Rights Act claim for damages. Before resolving supplemental jurisdiction, the court ordered Plaintiff and counsel to submit a written response and declarations addressing the statutory damages sought and whether they qualify as high-frequency litigants under California law.

DISPOSITION

other

CASES CITED

- Carnegie-Mellon Univ. v. Cohill, 484 U.S. 343, 350 (1988)
- Acri v. Varian Assocs., 114 F.3d 999, 1000 (9th Cir. 1997)
- Schutza v. Cuddeback, 262 F. Supp. 3d 1025, 1031 (S.D. Cal. 2017)

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