

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Maguire Properties 755 S Fig LLC v. Donovan Grant

Maguire Properties · No. 2:25-cv-06308-CAS-RAOx · Decided August 1, 2025

SUMMARY

The United States District Court for the Central District of California remanded an unlawful detainer action to Los Angeles County Superior Court. The court held that unlawful detainer is a state-law claim and that it lacked subject-matter jurisdiction, noting that the defendant failed to respond to the order to show cause.

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	August 1, 2025
DOCKET	2:25-cv-06308-CAS-RAOx
DISPOSITION	remanded
PROCEDURAL POSTURE	Defendant removed an unlawful detainer action from Los Angeles County Superior Court based on alleged federal-question jurisdiction. The district court remanded the action for lack of subject matter jurisdiction after defendant failed to respond to an order to show cause.
STANDARD OF REVIEW	The court independently determined whether subject matter jurisdiction existed and whether remand was required.
PRECEDENTIAL VALUE	Unknown

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 the action should be remanded to Los Angeles County Superior Court.

HOLDINGS

1. A federal district court lacks subject matter jurisdiction over an action asserting only an unlawful detainer claim because unlawful detainer is a state-law claim within the province of state court.
2. When a removed unlawful detainer action presents no federal question and the federal court therefore lacks subject matter jurisdiction, the court must remand the action to state court.

KEY QUOTATIONS

“*[u]nlawful detainer actions are strictly within the province of state court.*” (Opinion text)

“*The Court therefore lacks subject matter jurisdiction and must remand.*” (Opinion text)

FACTUAL BACKGROUND

Maguire Properties 755 S Fig LLC brought a single unlawful detainer claim against Donovan Grant. The action was originally filed in Los Angeles County Superior Court and was later removed by Grant to federal court. The complaint asserted only the state-law unlawful detainer claim.

PROCEDURAL HISTORY

Plaintiff filed an unlawful detainer action in Los Angeles County Superior Court on February 24, 2025. Defendant removed the case to the Central District of California on July 10, 2025, asserting jurisdiction under 28 U.S.C. §§ 1331 and 1441, and filed an in forma pauperis request. The district court ordered defendant to show cause why the case should not be remanded; defendant did not respond, and the court remanded the action to state court.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The case is remanded to Los Angeles County Superior Court.

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)

