

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Miriam Maldonado v. Latanya Cooper

Maldonado v. Cooper · No. 2:25-cv-08056-DSF-PD · Decided September 10, 2025

SUMMARY

The United States District Court for 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 order requires the plaintiff to identify the statutory damages sought and provide declarations addressing whether the plaintiff and counsel qualify as high-frequency litigants under California law.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Dale S. Fischer
JURISDICTION	United States District Court for the Central District of California
DECIDED	September 10, 2025
DOCKET	2:25-cv-08056-DSF-PD
DISPOSITION	other
PROCEDURAL POSTURE	The plaintiff filed an action asserting an ADA claim for injunctive relief and an Unruh Civil Rights Act claim for damages. The district court issued an order to show cause regarding whether it should exercise supplemental jurisdiction over the state-law claims.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

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

PRACTICE AREAS

- civil procedure
- disability rights
- supplemental jurisdiction

QUESTIONS PRESENTED

1. Whether the district court should exercise supplemental jurisdiction over the plaintiff's Unruh Civil Rights Act claim and any other state-law claims under 28 U.S.C. § 1367(c).
2. Whether the plaintiff and counsel must provide information and declarations addressing whether they qualify as high-frequency litigants under California law.

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. The court noted that California has statutory pleading and filing-fee requirements for certain high-frequency litigants pursuing construction-related disability-access claims.

PROCEDURAL HISTORY

The complaint was filed in the Central District of California. Before resolving the jurisdictional issue, the court ordered the plaintiff to explain why supplemental jurisdiction should be exercised over the Unruh Act and any other state-law claims and to provide information concerning alleged high-frequency-litigant status and requested statutory damages.

DISPOSITION

other

CASES CITED

- City of Chicago v. Int’l Coll. of Surgeons, 522 U.S. 156, 173 (1997)
- Carnegie-Mellon Univ. v. Cohill, 484 U.S. 343, 350 (1988)
- Vo v. Choi, 49 F.4th 1167 (9th Cir. 2022)
- Arroyo v. Rosas, 19 F.4th 1202 (9th Cir. 2021)