

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

U.S. Bank Trust Company, National Association v. Alfonso Luna et al.

U.S. Bank Trust · No. 2:25-cv-11988-CAS-RAOx · Decided January 14, 2026

SUMMARY

The court issued an order to show cause concerning subject matter jurisdiction in a removed unlawful detainer action. Because the complaint asserts only a state-law unlawful detainer claim, the court directed the defendants to explain why the case should not be remanded to Los Angeles County Superior Court.

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	January 14, 2026
DOCKET	2:25-cv-11988-CAS-RAOx
DISPOSITION	other
PROCEDURAL POSTURE	Defendants removed a California unlawful-detainer action from Los Angeles County Superior Court and asserted federal-question jurisdiction. The federal court issued an order to show cause why the action should not be remanded for lack of subject matter jurisdiction.
STANDARD OF REVIEW	The court examined subject matter jurisdiction de novo and was required to assess federal jurisdiction independently.
PRECEDENTIAL VALUE	Unpublished district-court order; precedential status is unknown and the document is not a final merits disposition.
PARTIES	Alfonso Luna, Otilia Luna, Does 1 to 10, inclusive v. U.S. Bank Trust Company, National Association

TOPICS

- subject matter jurisdiction
- eviction
- landlord tenant
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the federal court had subject matter jurisdiction over a removed unlawful-detainer action asserting only a state-law claim.

HOLDINGS

1. An unlawful-detainer action asserting only a state-law claim does not, on the record presented, establish federal-question jurisdiction; such actions are strictly within the province of state court.

KEY QUOTATIONS

“[T]he complaint only asserts a claim for unlawful detainer, a cause of action that is purely a matter of state law.”

“Unlawful detainer actions are strictly within the province of state court.”

FACTUAL BACKGROUND

U.S. Bank Trust Company filed an unlawful-detainer action against Alfonso Luna, Otilia Luna, and Doe defendants in California state court. The complaint asserted only an unlawful-detainer claim. Defendants removed the action, contending that federal-question jurisdiction existed.

PROCEDURAL HISTORY

Plaintiff filed the unlawful-detainer action in Los Angeles County Superior Court on January 7, 2025. Defendants removed the action to the Central District of California on December 18, 2025, asserting jurisdiction under 28 U.S.C. §§ 1331 and 1443. The district court concluded that jurisdiction appeared lacking and ordered defendants to show cause in writing by January 28, 2026, why the case should not be remanded.

DISPOSITION

other

REMAND INSTRUCTIONS

Defendants were ordered to show cause in writing, on or before January 28, 2026, why the action should not be remanded to Los Angeles County Superior Court. The order did not itself remand the case.

CASES CITED

- Federal Nat'l Mort. Assoc. v. Suarez, 2011 U.S. Dist. LEXIS 82300, *6 (E.D. Cal. July 27, 2011)
- Deutsche Bank Nat'l Trust Co. v. Leonardo, 2011 U.S. Dist. LEXIS 83854, *2 (C.D. Cal. Aug. 1, 2011)

OPINION

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA CIVIL MINUTES — GENERAL Case No. 2:25-cv-11988-CAS-RAOx Date January 14, 2026 Title U.S. Bank Trust Company, National Association v. Alfonso Luna et al Present: The Honorable CHRISTINA A. SNYDER Catherine Jeang Not Present N/A Deputy Clerk Court Reporter / Recorder Tape No. Attorneys Present for Plaintiffs: Attorneys Present for Defendants: Not Present Not Present Proceedings: (IN CHAMBERS) - ORDER TO SHOW CAUSE RE: SUBJECT MATTER JURISDICTION On January 7, 2025, plaintiff U.S. Bank Trust Company (“plaintiff”) filed this unlawful detainer action against defendants Alfonso Luna and Otilia Luna (“defendants”), and Does 1 to 10, inclusive, in Los Angeles County Superior Court.

Dkt. 1 at 19. Defendants removed the case to this Court on December 18, 2025. Id. Defendants concurrently filed a request to proceed in forma pauperis. Dkt. 2. Defendants assert that this Court has jurisdiction on the basis of a federal question. Dkt. 1 at 3 (citing 28 U.S.C. § 1331 and § 1443). It appears that this Court lacks subject matter jurisdiction over this action.

The law is clear that “[u]nlawful detainer actions are strictly within the province of state court.” 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) (“[T]he complaint only asserts a claim for unlawful detainer, a cause of action that is purely a matter of state law.”).

Here, the only claim asserted by plaintiff is for unlawful detainer against defendant. See dkt. 1 at 19-22. Accordingly, defendants are hereby ORDERED TO SHOW CAUSE, in writing, on or before January 28, 2026, why this case should not be remanded to Los Angeles County Superior Court. IT IS SO ORDERED. 00: 00 Initials of Preparer CMI