

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Raul Uriarte-Limon v. Castaneda Brake Motors Inc., et al.

Uriarte-Limon · No. CV 25-6539-MWF(MARx) · Decided July 25, 2025

SUMMARY

The court ordered the plaintiff to show cause why it should exercise supplemental jurisdiction over claims under California's Unruh Civil Rights Act and other state laws arising from an alleged ADA violation. The response must address the statutory damages sought and provide sworn facts concerning whether the plaintiff or counsel qualifies as a high-frequency litigant under California law. The court warned that failure to respond could result in dismissal of the action or declination of supplemental jurisdiction.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Michael W. Fitzgerald
JURISDICTION	United States District Court for the Central District of California
DECIDED	July 25, 2025
DOCKET	CV 25-6539-MWF(MARx)
DISPOSITION	other
PROCEDURAL POSTURE	The district court sua sponte issued an order to show cause directing Plaintiff to explain why the court should exercise supplemental jurisdiction over the Unruh Civil Rights Act claim and other state-law claims.
PRECEDENTIAL VALUE	Unknown; civil minutes order to show cause with no reporter citation.

TOPICS

- subject matter jurisdiction
- civil procedure
- ada / disability
- damages

PRACTICE AREAS

- Civil procedure
- Federal jurisdiction
- Americans with Disabilities Act
- California civil rights law

QUESTIONS PRESENTED

1. Whether the district court should exercise supplemental jurisdiction over the Unruh Civil Rights Act claim and the other state-law claims.
2. Whether Plaintiff must provide the amount of Unruh Act statutory damages sought and facts addressing whether Plaintiff or Plaintiff's counsel qualifies as a high-frequency litigant under California law.

HOLDINGS

1. A district court may decline to exercise supplemental jurisdiction for the reasons identified in 28 U.S.C. § 1367(c), including substantial concerns about federal-state comity in ADA-based Unruh Act litigation.
2. A federal court may raise the issue of subject matter jurisdiction sua sponte at any time during the pendency of an action.

KEY QUOTATIONS

“a court may raise the question of subject matter jurisdiction, sua sponte, at any time during the pendency of the action”

“Failure to timely or adequately respond to this Order to Show Cause may, without further warning, result in the dismissal of the entire action without prejudice”

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 other state-law claims, with supplemental jurisdiction asserted as the jurisdictional basis for the Unruh Act claim.

PROCEDURAL HISTORY

Plaintiff filed a complaint asserting an ADA claim for injunctive relief, an Unruh Civil Rights Act damages claim, and other state-law claims. The court identified supplemental jurisdiction under 28 U.S.C. § 1367(a) as the sole asserted basis for jurisdiction over the Unruh Act claim and ordered Plaintiff to show cause why supplemental jurisdiction should be exercised.

DISPOSITION

other

CASES CITED

- Arroyo v. Rosas, 19 F.4th 1202, 1211–14 (9th Cir. 2021)
- Nevada v. Bank of Am. Corp., 672 F.3d 661, 673 (9th Cir. 2012)
- Snell v. Cleveland, Inc., 316 F.3d 822, 826 (9th Cir. 2002)

OPINION

Raul Uriarte-Limon v. Castaneda Brake Masters Inc.

PER CURIAM.

CIVIL MINUTES – GENERAL

Case No. CV 25-6539-MWF(MARx) Date: July 25, 2025 Title Raul Uriarte-Limon v. Castaneda Brake Motors Inc., et al. Present: The Honorable: MICHAEL W. FITZGERALD, United States District Judge Rita Sanchez Not Reported Deputy Clerk Court Reporter / Recorder Attorneys Present for Plaintiffs: Attorneys Present for Defendants: Not Present Not Present Proceedings: (IN CHAMBERS) ORDER TO SHOW CAUSE RE SUPPLEMENTAL JURISDICTION

The Complaint filed in this action asserts a claim for injunctive relief arising out of an alleged violation of the Americans With Disabilities Act (“ADA”), 42 U.S.C. §§ 12101-12213, a claim for damages pursuant to the Unruh Civil Rights Act (“Unruh Act”), Cal. Civ. Code §§ 51–53, and other state law claims alleged by Plaintiff. The sole basis for jurisdiction over the Unruh Act claim is supplemental jurisdiction pursuant to 28 U.S.C. § 1367(a). The Court, however, may decline to exercise supplemental jurisdiction for the reasons delineated in § 1367(c). See also *Arroyo v. Rosas*, 19 F.4th 1202, 1211–14 (9th Cir. 2021) (holding district courts may decline supplemental jurisdiction over ADA-based Unruh Act claims because of “very substantial threat to federal-state comity” presented by plaintiffs’ use of federal courts to evade California’s Unruh Act reforms). This Court has a sua sponte obligation to confirm that it has subject matter jurisdiction. *Nevada v. Bank of Am. Corp.*, 672 F.3d 661, 673 (9th Cir. 2012) (“[I]t is well established that ‘a court may raise the question of subject matter jurisdiction, sua sponte, at any time during the pendency of the action’” (quoting *Snell v. Cleveland, Inc.*, 316 F.3d 822, 826 (9th Cir. 2002))). Therefore, to assist this Court in its duty, Plaintiff is ORDERED to SHOW CAUSE in writing as to why this Court should exercise supplemental jurisdiction

CIVIL MINUTES – GENERAL

Case No. CV 25-6539-MWF(MARx) Date: July 25, 2025 Title Raul Uriarte-Limon v. Castaneda Brake Motors Inc., et al. over the Unruh Act claim and the other state law claims alleged by Plaintiff. The Response to the Order to Show Cause shall include (1) the amount of statutory damages sought pursuant to the Unruh Act; and (2) sufficient facts for the Court to determine whether Plaintiff or Plaintiff’s counsel meet the definition of a “high- frequency litigant” as defined in California Code of Civil Procedure section 425.55(b)(1) & (2). These facts shall be set forth in declarations signed under penalty of perjury. The Response shall be filed on or before AUGUST 8, 2025. Failure to timely or adequately respond to this Order to Show Cause may, without further warning, result in the dismissal of the entire action without prejudice or the Court’s declining to exercise supplemental jurisdiction over the Unruh Act claim and the dismissal of that claim pursuant to 28 U.S.C. § 1367(c). IT IS SO ORDERED.

