

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Yuri Doering v. JB Auto Repair Inc.

Doering v. JB Auto Repair Inc. · No. 2:25-cv-10078-SB-PD · Decided October 24, 2025

SUMMARY

The United States District Court for the Central District of California orders Plaintiff Yuri Doering to show cause why his California Unruh Act claim should not be dismissed without prejudice under 28 U.S.C. § 1367(c)(4). The order relies on Ninth Circuit precedent recognizing exceptional federalism and comity concerns when federal courts exercise supplemental jurisdiction over ADA-based Unruh Act claims, and requires Plaintiff to provide information concerning damages and high-frequency-litigant status.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Stanley Blumenfeld, Jr.
JURISDICTION	United States District Court for the Central District of California
DECIDED	October 24, 2025
DOCKET	2:25-cv-10078-SB-PD
DISPOSITION	other
PROCEDURAL POSTURE	Order to show cause concerning whether the Court should decline supplemental jurisdiction over Plaintiff's California Unruh Civil Rights Act claim and dismiss it without prejudice.
STANDARD OF REVIEW	Abuse-of-discretion principles govern a district court's decision whether to exercise supplemental jurisdiction; under 28 U.S.C. § 1367(c)(4), jurisdiction may be declined in exceptional circumstances when compelling reasons exist.
PRECEDENTIAL VALUE	unpublished district court order; precedential status unknown
PARTIES	Yuri Doering v. JB Auto Repair Inc.

TOPICS

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

PRACTICE AREAS

civil procedure

disability rights

supplemental jurisdiction

accessibility discrimination

QUESTIONS PRESENTED

1. Whether the Court may exercise supplemental jurisdiction over Plaintiff's closely related Unruh Act claim under 28 U.S.C. § 1367(a).
2. Whether the circumstances identified in *Arroyo v. Rosas* may constitute exceptional circumstances and compelling reasons under 28 U.S.C. § 1367(c)(4) to decline supplemental jurisdiction over an ADA-based Unruh Act claim at an early stage of the case.
3. What information Plaintiff must provide to show cause why the Unruh Act claim should not be dismissed without prejudice.

HOLDINGS

1. Because Plaintiff's Unruh Act claim is closely related to his ADA claim, the Court has authority under 28 U.S.C. § 1367(a) to exercise supplemental jurisdiction over the Unruh Act claim.
2. The Court preliminarily determined that the circumstances identified by the Ninth Circuit in *Arroyo v. Rosas* appear to provide a basis for declining supplemental jurisdiction over Plaintiff's Unruh Act claim under 28 U.S.C. § 1367(c)(4), but deferred a final decision and required Plaintiff to show cause.
3. Plaintiff was required to respond within 14 days after entry of the order, identify the statutory damages sought, and submit sworn declarations containing facts necessary to determine whether Plaintiff and his counsel satisfy the California definition of a high-frequency litigant; failure to respond would result in dismissal without prejudice of the Unruh Act claim without further order.

KEY QUOTATIONS

“supplemental jurisdiction “is a doctrine of discretion, not of plaintiff’s right,”” (at 1)

“retention of supplemental jurisdiction over ADA-based Unruh Act claims threatens to substantially thwart California’s carefully crafted reforms in this area and to deprive the state courts of their critical role in effectuating the policies underlying those reforms.” (at 2)

“Accordingly, the Court ORDERS Plaintiff within 14 days after entry of this Order to show cause in writing why the Court should not dismiss without prejudice his Unruh Act claim under § 1367(c)(4).” (at 3)

FACTUAL BACKGROUND

Plaintiff Yuri Doering has a physical disability and uses a wheelchair. He alleged that Defendant's auto repair shop imposes physical barriers that impede his access. He asserted claims under the ADA and the California Unruh Civil Rights Act, including a claim seeking statutory damages under the Unruh Act.

PROCEDURAL HISTORY

Plaintiff filed an action alleging that Defendant's auto repair shop contains physical barriers that impede wheelchair access, asserting claims under the Americans with Disabilities Act and the California Unruh Civil Rights Act. The Court concluded that the Unruh Act claim is closely related to the ADA claim and may be within supplemental jurisdiction, but ordered Plaintiff to show cause why the Court should not decline jurisdiction under 28 U.S.C. § 1367(c)(4). No claim had been adjudicated on the merits.

DISPOSITION

other

CASES CITED

- City of Chi. v. Int'l Coll. of Surgeons, 522 U.S. 156, 172 (1997)
- Arroyo v. Rosas, 19 F.4th 1202, 1213, 1215-17 (9th Cir. 2021)

OPINION

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA YURI DOERING, Case No. 2:25-cv-10078-SB-PD Plaintiff, v. ORDER TO SHOW CAUSE JB AUTO REPAIR INC., Defendant. Plaintiff Yuri Doering, who has a physical disability and uses a wheelchair, filed this suit alleging that Defendant's auto repair shop imposes physical barriers that impede his access, in violation of, inter alia, the Americans with Disabilities Act (ADA) and the Unruh Act.

Because Plaintiff's Unruh Act claim is closely related to his ADA claim, the Court has authority to exercise supplemental jurisdiction over the Unruh Act claim under 28 U.S.C. § 1367(a). However, supplemental jurisdiction "is a doctrine of discretion, not of plaintiff's right," and district courts "can decline to exercise jurisdiction over pendent claims for a number of valid reasons." City of Chi. v. Int'l Coll. of Surgeons, 522 U.S. 156, 172 (1997) (internal quotation marks and citations omitted).

This discretion is codified in § 1367(c): The district courts may decline to exercise supplemental jurisdiction over a claim under subsection (a) if— (1) the claim raises a novel or complex issue of State law, (2) the claim substantially predominates over the claim or claims over which the district court has original jurisdiction, (3) the district court has dismissed all claims over which it has original jurisdiction, or (4) in exceptional circumstances, there are other compelling reasons for declining jurisdiction.

28 U.S.C. § 1367(c). In a published decision, the Ninth Circuit explained that the California Legislature's 2012 and 2015 amendments to the Unruh Act, which were intended to protect businesses from abusive litigation by high-frequency litigants bringing construction-related claims, had led to a surge of filings in federal courts of ADA cases seeking statutory damages under the Unruh Act.

Arroyo v. Rosas, 19 F.4th 1202 (9th Cir. 2021). The Ninth Circuit agreed with the district court that this shift in filings from state courts to federal courts had circumvented the state legislature's goals and "rendered [the new statutory requirements] largely toothless, because they can now be readily evaded." Id. at 1213.

The court explained that "retention of supplemental jurisdiction over ADA-based Unruh Act claims threatens to substantially thwart California's carefully crafted reforms in this area and to deprive the state courts of their critical role in effectuating the policies underlying those reforms." Id. Thus, the court held that these circumstances are "exceptional" within the meaning of § 1367(c)(4) and therefore potentially justified declining supplemental jurisdiction over the plaintiff's Unruh Act claim.

See id. ("The district court did not abuse its discretion in concluding that this extraordinary situation threatens unusually significant damage to federal-state comity and presents 'exceptional circumstances' within the meaning of § 1367(c)(4).").

However, because the district court had waited to decline supplemental jurisdiction until after granting summary judgment on the plaintiff's ADA claim, thereby effectively deciding the Unruh Act claim, the Ninth Circuit reversed the court's decision to decline supplemental jurisdiction, holding that it had waited too long to invoke the comity interest. Id. at 1215–17.

Unlike Arroyo, this case is still at a very early stage, and this Court has not yet addressed or adjudicated the merits of any of Plaintiff's claims. This appears to be a case in which the Court should decline supplemental jurisdiction over Plaintiff's Unruh Act claim under § 1367(c)(4) to protect the comity interests identified in Arroyo.

Accordingly, the Court ORDERS Plaintiff within 14 days after entry of this Order to show cause in writing why the Court should not dismiss without prejudice his Unruh Act claim under § 1367(c)(4). Plaintiff's response must identify the amount of statutory damages Plaintiff seeks to recover and must be supported by declarations, signed under penalty of perjury, providing all facts necessary for the Court to determine if Plaintiff and his counsel satisfy the definition of a "high-frequency litigant" as provided by Cal. Civ.

Proc. Code § 425.55(b)(1)–(2). If Plaintiff fails to file a response within 14 days after entry of this Order, the Court will decline to exercise supplemental jurisdiction over his Unruh Act claim, and the Unruh Act claim will be automatically dismissed without prejudice without further order of the Court. Date: October 24, 2025 _____ Stanley Blumenfeld, Jr. United States District Judge