

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Ana Ventura v. Thai Q Truong

Ventura · No. 2:25-cv-05697-WLH-MAR · Decided July 16, 2025

SUMMARY

The United States District Court for the Central District of California orders Plaintiff Ana Ventura to show cause why the court should exercise supplemental jurisdiction over claims under California’s Unruh Civil Rights Act. The order discusses the discretionary factors under 28 U.S.C. § 1367(c), California’s heightened requirements for disability-access claims, and decisions declining supplemental jurisdiction over similar claims. Plaintiff is directed to identify the statutory damages sought and provide declarations addressing whether Plaintiff and counsel qualify as high-frequency litigants.

CASE DETAILS

COURT	United States District Court for the Central District of California
JURISDICTION	United States District Court for the Central District of California
DECIDED	July 16, 2025
DOCKET	2:25-cv-05697-WLH-MAR
DISPOSITION	other
PROCEDURAL POSTURE	The court 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 related state-law claims.
PRECEDENTIAL VALUE	unknown
PARTIES	Ana Ventura v. Thai Q Truong, et al.

TOPICS

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

PRACTICE AREAS

- civil procedure
- disability rights
- supplemental jurisdiction

QUESTIONS PRESENTED

1. Whether the court should exercise supplemental jurisdiction over Plaintiff's Unruh Civil Rights Act claim and any related state-law claims under 28 U.S.C. § 1367(c).
2. Whether Plaintiff and counsel must provide information concerning the amount of statutory damages sought and Plaintiff's status as a high-frequency litigant before the court decides whether to exercise supplemental jurisdiction.

HOLDINGS

1. Supplemental jurisdiction is discretionary, and a district court may decline to exercise it when one of the circumstances identified in 28 U.S.C. § 1367(c) is present, after considering judicial economy, convenience, fairness, and comity.

KEY QUOTATIONS

“is a doctrine of discretion, not of plaintiff’s right” (at 2)

“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.” (at 2)

FACTUAL BACKGROUND

The complaint alleges a violation of the Americans with Disabilities Act and seeks injunctive relief. It also asserts a damages claim under California's Unruh Civil Rights Act, apparently based on construction-related accessibility allegations. The court noted California's statutory efforts to address allegedly abusive disability-access litigation, including heightened pleading requirements and a high-frequency-litigant fee.

PROCEDURAL HISTORY

Plaintiff filed a complaint asserting an Americans with Disabilities Act claim for injunctive relief and a California Unruh Civil Rights Act claim for damages. Plaintiff requested supplemental jurisdiction over the state-law claim under 28 U.S.C. § 1367. The court did not decide jurisdiction at this stage; it ordered Plaintiff and counsel to provide written responses and declarations concerning the statutory damages sought and whether Plaintiff qualifies as a high-frequency litigant.

DISPOSITION

other

CASES CITED

- Carnegie-Mellon Univ. v. Cohill, 484 U.S. 343, 350 (1988)
- Acri v. Varian Assocs., 114 F.3d 999, 1000 (9th Cir. 1997)
- Schutza v. Cuddeback, 262 F. Supp. 3d 1025, 1031 (S.D. Cal. 2017)