

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Juan Valencia v. Ann Miller Naber

Valencia · No. 2:25-cv-07867-WLH-RAO · Decided September 16, 2025

SUMMARY

The United States District Court for the Central District of California ordered Plaintiff Juan Valencia to show cause why the court should exercise supplemental jurisdiction over his California Unruh Civil Rights Act and related state-law claims. The order discusses 28 U.S.C. § 1367(c), California pleading requirements for construction-related accessibility claims, and the interests of fairness and comity in cases involving potential high-frequency litigants. Plaintiff was directed to identify the statutory damages sought and provide declarations addressing the high-frequency-litigant requirements within 14 days.

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	September 16, 2025
DOCKET	2:25-cv-07867-WLH-RAO
DISPOSITION	other
PROCEDURAL POSTURE	The district 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.
STANDARD OF REVIEW	Discretionary determination under 28 U.S.C. § 1367(c), guided by judicial economy, convenience, fairness, and comity.
PRECEDENTIAL VALUE	Unknown; district-court order to show cause
PARTIES	Juan Valencia v. Ann Miller Naber, et al.

TOPICS

- civil procedure
- ada / disability
- public accommodations discrimination
- pleadings

PRACTICE AREAS

- Civil procedure
- Civil rights
- Disability discrimination

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.
2. Whether Plaintiff and counsel must provide information and declarations addressing Plaintiff's claimed statutory damages and potential status as a high-frequency litigant under California law.

HOLDINGS

1. Supplemental jurisdiction is discretionary rather than a plaintiff's right, and a federal district court may decline supplemental jurisdiction when one of the circumstances identified in 28 U.S.C. § 1367(c) exists, while weighing judicial economy, convenience, fairness, and comity.
2. The court required Plaintiff to show cause in writing why supplemental jurisdiction should be exercised over the Unruh Act claim and related state-law claims, and required Plaintiff and counsel to provide declarations addressing the high-frequency-litigant issue.

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 alleged a violation of the Americans with Disabilities Act and sought injunctive relief. It also sought damages under California's Unruh Civil Rights Act based on alleged construction-related accessibility barriers. The court noted California statutes imposing heightened pleading requirements and fees in certain disability-access actions, and considered California's interest in discouraging unverified or abusive claims.

PROCEDURAL HISTORY

Plaintiff filed a complaint asserting an ADA claim for injunctive relief and a claim for damages under California's Unruh Civil Rights Act. Plaintiff requested supplemental jurisdiction over the state-law claim under 28 U.S.C. § 1367. Before determining whether to exercise that jurisdiction, the court ordered Plaintiff and counsel to provide written responses and declarations concerning the amount of damages 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)

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