

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Verbena WRC 15th LP v. Jesse Scott

Verbena WRC · No. 2:25-cv-01554-CAS-SKx · Decided April 21, 2025

SUMMARY

The United States District Court for the Central District of California ordered remand of an unlawful detainer action removed from Los Angeles County Superior Court. The court held that unlawful detainer is a state-law cause of action and that the defendant failed to establish federal-question jurisdiction or respond to the order to show cause.

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	April 21, 2025
DOCKET	2:25-cv-01554-CAS-SKx
DISPOSITION	remanded
PROCEDURAL POSTURE	Defendant removed an unlawful detainer action from Los Angeles County Superior Court based on asserted federal-question jurisdiction. The district court remanded the case sua sponte after determining that subject matter jurisdiction was lacking and defendants failed to respond to an order to show cause.
PRECEDENTIAL VALUE	Unknown
PARTIES	Jesse Scott v. Verbena WRC 15th LP

TOPICS

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

PRACTICE AREAS

- civil procedure
- real estate
- landlord tenant

QUESTIONS PRESENTED

1. Whether the federal court had subject matter jurisdiction over a removed action asserting only a state-law unlawful detainer claim.
2. Whether the action should be remanded to Los Angeles County Superior Court.

HOLDINGS

1. The court lacked subject matter jurisdiction because the complaint asserted only an unlawful detainer claim, which is purely a matter of state law and does not support federal-question jurisdiction.
2. Remand to Los Angeles County Superior Court was required because the federal court lacked subject matter jurisdiction.

KEY QUOTATIONS

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

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

FACTUAL BACKGROUND

Verbena WRC 15th LP brought an unlawful detainer action against Jesse Scott and Does 1-10. The complaint asserted only an unlawful detainer claim, which arises under state law. Scott removed the action on the asserted basis of federal-question jurisdiction.

PROCEDURAL HISTORY

Verbena WRC 15th LP filed an unlawful detainer action against Jesse Scott and Does 1-10 in Los Angeles County Superior Court on October 29, 2024. Scott removed the action to the Central District of California on February 24, 2025, asserting jurisdiction under 28 U.S.C. §§ 1331 and 1441. The court issued an order to show cause regarding remand, defendants did not respond, and the court remanded the case to Los Angeles County Superior Court.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The case is remanded to Los Angeles County Superior Court.

CASES CITED

- Federal National Mortgage Association v. Suarez, 2011 U.S. Dist. LEXIS 82300 (E.D. Cal. July 27, 2011)
- Deutsche Bank National Trust Co. v. Leonardo, 2011 U.S. Dist. LEXIS 83854 (C.D. Cal. Aug. 1, 2011)

