

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF  
CALIFORNIA

John Ho v. Great Hope Investments, LLC

Ho v. Great Hope Investments · No. 2:25-cv-00823-MEMF-PVC · Decided February 21, 2025

SUMMARY

The United States District Court for the Central District of California orders John Ho to show cause why the court should not decline supplemental jurisdiction over his California Unruh Civil Rights Act claim. The court requires Ho to identify the statutory damages sought and requires Ho and his counsel to provide declarations addressing whether they qualify as high-frequency litigants under California law.

CASE DETAILS

|                       |                                                                                                                                                                                 |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Central District of California                                                                                                             |
| WRITING FOR THE COURT | Maame Ewusi-Mensah Frimpong                                                                                                                                                     |
| JURISDICTION          | United States District Court for the Central District of California                                                                                                             |
| DECIDED               | February 21, 2025                                                                                                                                                               |
| DOCKET                | 2:25-cv-00823-MEMF-PVC                                                                                                                                                          |
| DISPOSITION           | other                                                                                                                                                                           |
| PROCEDURAL POSTURE    | The court issued an order to show cause directing Plaintiff to explain why the court should exercise supplemental jurisdiction over his state-law Unruh Civil Rights Act claim. |
| PRECEDENTIAL VALUE    | Unknown; interlocutory order to show cause                                                                                                                                      |

TOPICS

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

PRACTICE AREAS

- Federal civil procedure
- Disability rights
- Supplemental jurisdiction

QUESTIONS PRESENTED

- Whether the court should exercise supplemental jurisdiction over Ho's Unruh Civil Rights Act claim under 28 U.S.C. § 1367(c).

2. Whether Ho and his counsel must provide information and declarations concerning statutory damages and high-frequency-litigant status before the court decides whether to exercise supplemental jurisdiction.

#### KEY QUOTATIONS

*“when deciding whether to exercise supplemental jurisdiction, ‘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

Ho alleged that Great Hope Investments, LLC violated the ADA and California's Unruh Civil Rights Act through construction-related accessibility barriers. He sought injunctive relief under the ADA and damages under the Unruh Act. The court identified California pleading and disclosure requirements applicable to certain construction-access claims and sought information regarding the amount of damages and whether Ho or his counsel qualified as high-frequency litigants.

#### PROCEDURAL HISTORY

On January 30, 2025, John Ho filed a complaint asserting a federal claim for injunctive relief under the Americans with Disabilities Act and a state-law damages claim under California's Unruh Civil Rights Act. The complaint invoked federal-question and civil-rights jurisdiction for the ADA claim and supplemental jurisdiction for the state claim. The district court did not decide the jurisdictional issue but ordered Ho and his counsel to respond with information and declarations concerning damages and high-frequency-litigant status.

#### DISPOSITION

other

#### CASES CITED

- City of Chicago v. International College of Surgeons, 522 U.S. 156, 173 (1997)
- Carnegie-Mellon University v. Cohill, 484 U.S. 343, 350 (1988)