

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Clifton Walker v. Walgreen Co. et al.

Walker v. Walgreen Co. · No. 2:25-cv-08108-FLA-E · Decided October 7, 2025

SUMMARY

The United States District Court for the Central District of California ordered Plaintiff Clifton Walker to show cause why the court should exercise supplemental jurisdiction over his California Unruh Civil Rights Act and related state-law claims. The court directed Plaintiff and counsel to address the statutory damages sought and provide declarations concerning whether Plaintiff qualifies as a high-frequency litigant under California law, warning that inadequate responses could result in dismissal of the state-law claims without prejudice.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Fernando L. Aenlle-Rocha
JURISDICTION	United States District Court for the Central District of California
DECIDED	October 7, 2025
DOCKET	2:25-cv-08108-FLA-E
DISPOSITION	other
PROCEDURAL POSTURE	The court issued an order to show cause requiring plaintiff to explain why the court should exercise supplemental jurisdiction over the California Unruh Civil Rights Act claim and related state-law claims.
STANDARD OF REVIEW	Discretionary determination under 28 U.S.C. § 1367(c), guided by the values of judicial economy, convenience, fairness, and comity.
PRECEDENTIAL VALUE	unpublished
PARTIES	Clifton Walker v. Walgreen Co. et al.

TOPICS

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

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the court should exercise supplemental jurisdiction over plaintiff's Unruh Act claim and any related state-law claims.
2. What information plaintiff and counsel must provide for the court to determine whether declining supplemental jurisdiction may be appropriate under 28 U.S.C. § 1367(c).

HOLDINGS

1. Supplemental jurisdiction is discretionary, and a district court may decline to exercise it under 28 U.S.C. § 1367(c), including when all claims within original jurisdiction have been dismissed or when exceptional circumstances provide compelling reasons to decline jurisdiction.
2. The court required plaintiff to show cause why it should exercise supplemental jurisdiction over the Unruh Act claim and related state-law claims, and required plaintiff and counsel to submit information and declarations concerning statutory damages and high-frequency-litigant status.

KEY QUOTATIONS

“The United States Supreme Court has recognized supplemental jurisdiction “is a doctrine of discretion, not of plaintiff’s right, and that district courts can decline to exercise jurisdiction over pendent claims for a number of valid reasons.””

“Failure to timely or adequately respond to this Order to Show Cause may result in the court declining to exercise supplemental jurisdiction over the Unruh Act claim and any related state law claims and dismissing such claim or claims without further notice, pursuant to 28 U.S.C. § 1367(c).”

FACTUAL BACKGROUND

The complaint alleges a violation of the Americans with Disabilities Act and seeks injunctive relief. It also asserts a California Unruh Civil Rights Act claim seeking damages and asks the federal court to exercise supplemental jurisdiction. The court noted California’s heightened pleading requirements and high-frequency-litigant fee provisions for construction-related accessibility claims.

PROCEDURAL HISTORY

Plaintiff filed a federal ADA claim for injunctive relief and a state-law Unruh Act claim for damages, requesting supplemental jurisdiction over the state claim. Before resolving the jurisdictional issue, the district court ordered plaintiff to respond within fourteen days and provide declarations addressing the amount of statutory damages and whether plaintiff and counsel qualify as high-frequency litigants under California law.

DISPOSITION

other

CASES CITED

- City of Chi. v. Int'l Coll. of Surgeons, 522 U.S. 156, 172-73 (1997)
- 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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