

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Mario Mendoza v. Venemous Detailing LLC, et al.

No. CV 25-12157-DMG (MAAx), United States District Court for the Central District of California (December 29, 2025)

SUMMARY

The United States District Court for the Central District of California orders the plaintiff to show cause why the court should exercise supplemental jurisdiction over state-law claims arising under California disability-access and negligence statutes. The court discusses California’s heightened pleading requirements and high-frequency litigant provisions for Unruh Act claims, as well as comity and exceptional circumstances under 28 U.S.C. § 1367(c). Plaintiff must respond by January 8, 2026, identify the statutory damages sought, and provide declarations addressing high-frequency-litigant status.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Dolly M. Gee
JURISDICTION	United States District Court for the Central District of California
DECIDED	December 29, 2025
DOCKET	CV 25-12157-DMG (MAAx)
DISPOSITION	other
PROCEDURAL POSTURE	The district court issued an order to show cause directing the plaintiff to explain why the court should exercise supplemental jurisdiction over several California-law claims.
STANDARD OF REVIEW	Not applicable to this interlocutory order. The opinion notes that a district court's decision to decline supplemental jurisdiction is reviewed for abuse of discretion.
PRECEDENTIAL VALUE	unpublished, nonprecedential district-court order

TOPICS

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

PRACTICE AREAS

federal jurisdiction

civil procedure

disability rights

ADA litigation

QUESTIONS PRESENTED

1. Whether the court should exercise supplemental jurisdiction over the Unruh Act, California Disabled Persons Act, California Health and Safety Code, and negligence claims.
2. Whether plaintiff must provide information regarding the amount of statutory damages sought and declarations addressing whether plaintiff and counsel satisfy California's definition of a high-frequency litigant.

KEY QUOTATIONS

“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.” (1)

“The district court's principal justification for declining supplemental jurisdiction was that the distinctive configuration of California-law rules . . . would be rendered ineffectual if the district court were to exercise supplemental jurisdiction.” (2)

FACTUAL BACKGROUND

Plaintiff filed an action alleging an ADA violation involving disability access and seeking injunctive relief. The complaint also sought damages under California's Unruh Civil Rights Act and asserted claims under the California Disabled Persons Act, the California Health and Safety Code, and negligence. The court was concerned that California's heightened pleading requirements and high-frequency-litigant provisions could be undermined if the state-law claims proceeded in federal court.

PROCEDURAL HISTORY

The complaint asserted an ADA claim for injunctive relief and state-law claims under the Unruh Civil Rights Act, the California Disabled Persons Act, the California Health and Safety Code, and negligence. Before resolving the jurisdictional issue, the court ordered the plaintiff and counsel to provide written responses and declarations addressing supplemental jurisdiction and whether plaintiff qualified as a high-frequency litigant.

DISPOSITION

other

CASES CITED

- City of Chicago v. International College of Surgeons, 522 U.S. 156, 173, 118 S. Ct. 523, 534 (1997)
- Carnegie-Mellon University v. Cohill, 484 U.S. 343, 350 (1988)
- Schutza v. Cuddeback, 262 F. Supp. 3d 1025, 1031 (S.D. Cal. 2017)
- Arroyo v. Rosas, 19 F.4th 1202, 1211 (9th Cir. 2021)

