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22 **UNITED STATES DISTRICT COURT**
23 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

24 DO NO HARM; et al.,
25 *Plaintiffs,*

26 and

27 UNITED STATES OF AMERICA,
28 *Plaintiff-Intervenor,*

v.

REGENTS OF THE UNIVERSITY OF
CALIFORNIA, et al.,
Defendants.

Case No. 2:25-cv-04131-JWH-JDE

STIPULATION OF DISMISSAL

1 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A) and Local Rule 7-1,
2 it is hereby stipulated and agreed upon between Plaintiff-Intervenor United States
3 of America, Defendants The Regents of the University of California (“The
4 Regents”), Julio Frenk, Jennifer Lucero, Gene Block, and their respective counsel
5 as follows:

- 6 1. The United States moved to intervene in this action on January 28, 2026
7 (Dkt.77);
- 8 2. The Court granted the motion on February 19, 2026 (Dkt. 85);
- 9 3. The United States filed its Complaint-in-Intervention on February 24,
10 2026 (Dkt. 86);
- 11 4. All of the United States’s claims are voluntarily dismissed, without
12 prejudice, against the following Defendants:
 - 13 a. Julio Frenk;
 - 14 b. Jennifer Lucero; and
 - 15 c. Gene Block;
- 16 5. The United States’s claim against The Regents remains in this case;
- 17 6. As part of this stipulation, Defendants represent that any injunctive or
18 declaratory relief against The Regents will apply to and be binding on
19 the University of California, Los Angeles (“UCLA”) and the David
20 Geffen School of Medicine at UCLA; and
- 21 7. Defendants do not waive any defenses or objections in this action by
22 agreeing to this stipulation.

23 [SIGNATURE PAGE FOLLOWS]

1 Dated: March 16, 2026

Respectfully submitted,

2 /s/ Felicia H. Ellsworth

/s/ John Mertens

3 **WILMER CUTLER PICKERING**
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CIVIL RIGHTS DIVISION
U.S. DEPARTMENT OF JUSTICE

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ATTESTATION OF CONCURRENCE IN FILING

Pursuant to United States District Court for the Central District of California’s Civil Local Rule 5-4.3.4(a)(2)(i), I hereby attest that all signatories to this document have concurred in this filing and have authorized this filing.

Dated: March 16, 2026

/s/ Felicia H. Ellsworth

Felicia H. Ellsworth

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