

CONSOVOY MCCARTHY PLLC

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Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

DO NO HARM; STUDENTS FOR
FAIR ADMISSIONS; and KELLY MA-
HONEY, individually and on behalf of
others similarly situated,

Plaintiffs,

v.

DAVID GEFFEN SCHOOL OF
MEDICINE AT UCLA; UNIVERSITY
OF CALIFORNIA, LOS ANGELES;
REGENTS OF THE UNIVERSITY
OF CALIFORNIA; MARIA ANGUI-
ANO, ELAINE BATCHLOR, JOSIAH
BEHARRY, CARMEN CHU, MI-
CHAEL COHEN, GARETH ELLIOT,
HOWARD GUBER, JOSE HERNAN-
DEZ, NANCY LEE, RICHARD LEIB,
HADI MAKARECHIAN, ANA MA-
TOSANTOS, ROBERT MYERS,
LARK PARK, JANET REILLY,
MARK ROBINSON, GREGORY
SARRIS, AND JONATHAN SURES
JENNIFER LUCERO, GAVIN NEW-
SOM, ELENI KOUNALAKIS, ROB-
ERT RIVAS, TONY THURMOND,
GEOFFREY PACK, AND ALFONSO
SALAZAR, each in their personal and

Case No. 2:25-cv-4131

NOTICE OF RELATED CASE

1 official capacities as Regents; MI-
2 CHAEL DRAKE, in his personal and
3 official capacities as the President of the
4 UC System and Regent; JULIO
5 FRENK, in his personal and official ca-
6 pacities as the Chancellor of UCLA;
7 STEVEN DUBINETT, in his personal
8 and official capacities as the Dean of
9 David Geffen School of Medicine at
10 UCLA; JENNIFER LUCERO, in her
11 personal and official capacities as the
12 Associate Dean of Admissions of David
13 Geffen School of Medicine at UCLA;
14 ALICE KUO, RUSSELL BUHR, MA-
15 NUEL CELEDON, GARY HOL-
16 LAND, CAROLYN HOUSER, CHRIS-
17 TINE MYO, FAYSAL SAAB, each in
18 their personal and official capacities as
19 members of the Admissions Oversight
20 and Policy Committee of David Geffen
21 School of Medicine at UCLA; and
22 MEMBERS OF THE ADMISSIONS
23 COMMITTEE, in their personal and of-
24 ficial capacities as members of the Ad-
25 missions Committee of David Geffen
26 School of Medicine at UCLA,

Defendants.

1 Per L.R. 83-1.3.1, Plaintiffs submit this notice of related cases. This case is re-
2 lated to *Students Against Racial Discrimination v. Regents of the University of California*, No.
3 8:25-cv-00192-JWH-JDE.
4

5 This case challenges UCLA Medical School’s illegal use of race in admissions.
6 *DNH-Compl.* ¶¶1-11. Plaintiffs allege that UCLA discriminates on account of race
7 when admitting students, consistent with and pursuant to the UC System’s desire to
8 racially balance its student population. ¶¶48-88. Plaintiffs’ claims include the Equal
9 Protection Clause of the Fourteenth Amendment, Title VI of the Civil Rights Act of
10 1964, and the Civil Rights Act of 1866 (42 U.S.C. §1981). ¶¶124-28. Plaintiffs name as
11 defendants, among others, the Regents of the University of California, Michael Drake
12 (UC President), and Julio Frenk (UCLA Chancellor). ¶¶19-23.
14

15 The plaintiff in *SARD* similarly alleges that the UC system “discriminates on
16 account of race when admitting students.” *SARD-Compl.* ¶8. It challenges various UC
17 campuses’ racial preferences in admissions under the Equal Protection Clause, Title
18 VI, and §1981. ¶¶42-60. And it names as defendants, among others, the Regents,
19 Drake, and Frenk. ¶¶4-7.
20
21

22 Both cases thus “arise from the same or a closely related transaction, happening,
23 or event”—the continued use of race by the UC System and its component schools.
24 L.R. 83-1.3.1(a). Furthermore, both cases “call for determination of the same or sub-
25 stantially related or similar questions of law and fact” relating to associational standing
26 and the schools’ continued use of race in admissions in violation of the Equal
27
28

1 Protection Clause, Title VI, and §1981. L.R. 83-1.3.1(b). For all these reasons, these
2 cases likely “would entail substantial duplication of labor if heard by different judges.”
3 L.R. 83-1.3.1(c).
4

5
6 Dated: May 8, 2025

Respectfully submitted,

7 /s/ Bryan Weir

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