STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT

CASE NO. 2:25-cv-4131-MCS-JC

Document 35

Filed 06/06/25

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Pursuant to Local Rules 7-1 and 8-3, Plaintiffs Do No Harm, Students for Fair Admissions, and Kelly Mahoney (collectively, "Plaintiffs"), and Defendants the Regents of the University of California (the "University"), Julio Frenk, in his personal capacity and in his official capacity as the Chancellor of UCLA ("Chancellor Frenk"), Jennifer Lucero, in her personal capacity and in her official capacity as the Associate Dean of Admissions of the David Geffen School of Medicine at UCLA ("Dean Lucero"), by and through their respective undersigned attorneys, hereby stipulate and request as follows:

WHEREAS Plaintiffs filed their Complaint on May 8, 2025;
WHEREAS the University was served with the Complaint on May 19, 2025;
WHEREAS Plaintiff dismissed all claims against the following Defendants
on June 3, 2025:

- a. University of California, Los Angeles ("UCLA");
- b. David Geffen School of Medicine at UCLA;
- c. Maria Anguiano, Elaine Batchlor, Josiah Beharry, Carmen Chu, Michael Cohen, Gareth Elliot, Howard Guber, Jose Hernandez, Nancy Lee, Richard Leib, Hadi Makarechian, Ana Matosantos, Robert Myers, Lark Park, Janet Reilly, Mark Robinson, Gregory Sarris, and Jonathan Sures, in their personal and official capacities as appointed regents.
- d. Gavin Newsom, Eleni Kounalakis, Robert Rivas, Tony Thurmond, Geoffrey Pack, and Alfonso Salazar, in their personal and official capacities as ex officio regents;
- e. Michael Drake, in his personal and official capacities as the President of the UC System and an ex officio regent;
- f. Steven Dubinett, in his personal and official capacities as the Dean of the David Geffen School of Medicine at UCLA;

- g. Alice Kuo, Russell Buhr, Manuel Celedon, Gary Holland, Carolyn Houser, Christine Myo, and Faysal Saab, in their personal and official capacities as the members of the Admissions Oversight and Policy Committee; and
- h. Members of the Admissions Committee of David Geffen School of Medicine at UCLA, in their personal and official capacities;

WHEREAS the following Defendants remain in the case:

- a. The University;
- b. Chancellor Frenk; and
- c. Dean Lucero;

WHEREAS Plaintiffs requested that Chancellor Frenk and Dean Lucero waive service of process on May 30, 2025;

WHEREAS Chancellor Frenk and Dean Lucero waived service of process on June 5, 2025;

WHEREAS the University's deadline to answer or otherwise respond to the Complaint is June 9, 2025 (Fed. R. Civ. P. 12(a)(1)(A)(i));

WHEREAS Chancellor Frenk and Dean Lucero's deadline to answer or otherwise respond to the Complaint is July 29, 2025 (Fed. R. Civ. P. (4)(d)(3));

WHEREAS Plaintiffs agree that the University's deadline to answer or otherwise respond to the Complaint may be extended up to and including July 29, 2025 so that the deadlines to respond to the Complaint are the same for all Defendants in this action;

WHEREAS the Parties agree that the extension is made for good cause, including because it will serve the interests of judicial efficiency, and is the first such extension requested by the Parties; and

WHEREAS the extension will not alter the date of any event or any deadline already fixed by Court order;

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1 Respectfully submitted, Dated: June 6, 2025 2 /s/ Felicia H. Ellsworth /s/ Cameron T. Norris 3 WILMER CUTLER PICKERING HALE CONSOVOY MCCARTHY PLLC Thomas R. McCarthy (pro hac vice) AND DORR LLP 4 Debo Adegbile (pro hac vice pending) Bryan Weir (SBN 310964) 5 debo.adegbile@wilmerhale.com Cameron T. Norris (pro hac vice) cam@consovoymccarthy.com 7 World Trade Center 6 Frank H. Chang (pro hac vice) 250 Greenwich Street 7 New York, NY 10007 Marie Sayer (pro hac vice) 1600 Wilson Blvd., Suite 700 Telephone: 212-295-8800 8 Arlington, VA 22209 9 Felicia H. Ellsworth (pro hac vice (703) 243-9423 pending) 10 Attorneys for Do No Harm, Students felicia.ellsworth@wilmerhale.com for Fair Admissions, Kelly Mahoney 11 60 State Street Boston, MA 02109 12 LAWFAIR LLC Telephone: 617-526-6000 Adam K. Mortara (pro hac vice) 13 40 Burton Hills Blvd., Suite 200 Joshua A. Vittor (CA Bar No. 326221) 14 Nashville, TN 37215 joshua.vittor@wilmerhale.com (773) 750-7154 15 350 South Grand Avenue **Suite 2400** 16 Attorney for Students for Fair Los Angeles, CA 90071 Admissions 17 Telephone: 213-443-5300 18 ALTVIEW LAW GROUP LLP Attorneys for Defendants John M. Begakis (SBN 278681) 19 john@altviewlawgroup.com 9454 Wilshire Blvd., Suite 825 20 Beverly Hills, CA 90212 21 (310) 230-5580 22 Local Counsel 23 24 25 26 27 28

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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: June 6, 2025 /s/ Felicia H. Ellsworth

Felicia H. Ellsworth

STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT CASE NO. 2:25-cv-4131-MCS-JC

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13 14 15 16 17 18	MAHONEY, individually and on behalf of others similarly situated,  **Plaintiffs*, v.*  THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, et al.,	ated, ERNIA, et	ORDER ON STIPE EXTENDING TIME RESPOND TO COMO. 35)  Hon. Mark C. Scar Strated States Distriction Filed: May	ME TO OMPLAINT si, ict Judge	(ECF
<ul><li>19</li><li>20</li><li>21</li></ul>	Defendants.				
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Plaintiffs Do No Harm, Students for Fair Admissions, and Kelly Mahoney (collectively, "Plaintiffs"), and Defendants the Regents of the University of California (the "University"), Julio Frenk, in his personal capacity and in his official capacity as the Chancellor of UCLA ("Chancellor Frenk"), Jennifer Lucero, in her personal capacity and in her official capacity as the Associate Dean of Admissions of the David Geffen School of Medicine at UCLA ("Dean Lucero") have stipulated and requested to extend the deadline for the University to answer or otherwise respond to the Complaint up to and including July 29, 2025, which is the deadline for Chancellor Frenk and Dean Lucero to answer or otherwise respond to the Complaint. After full consideration, and good cause appearing, the Parties' request is GRANTED. Defendants will answer or otherwise respond to the Complaint on or by July 29, 2025.

IT IS SO ORDERED.

Dated: June 6, 2025

Mark C. Scarsi United States District Judge