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

23 DO NO HARM, et al.,

24 *Plaintiffs,*

25 v.

26 THE REGENTS OF THE
27 UNIVERSITY OF CALIFORNIA, et
28 al.,

Defendants.

Case No. 2:25-cv-04131-MCS-JC

[Assigned to Hon. Mark C. Scarsi]

NOTICE OF RELATED CASES
(L.R. 83-1.3.1)

Pursuant to Local Rule 83-1.3.1, Defendants submit this notice to identify this case for the Court as related to *Students Against Racial Discrimination v. Regents of the University of California, et al.*, No. 8:25-cv-00192-JWH-JDE (C.D. Cal.) (“*SARD*”), currently pending before Judge Holcomb.

Plaintiffs submitted a notice of related cases on May 8, 2025. *See* Dkt. 2. On June 4, 2025, Judge Holcomb declined to transfer this case, finding that it was “not sufficiently related [to *SARD*] to warrant transfer.” Dkt. 32.

After that declination, on June 10, 2025, the plaintiff in *SARD* filed a First Amended Complaint (“FAC”). *See SARD*, No. 8:25-cv-00192-JWH-JDE, Dkt. 26. The new allegations in the FAC warrant an order relating this case to *SARD* and transferring it to proceed before Judge Holcomb.¹ In particular, the FAC now alleges racial discrimination in admissions at six University of California medical schools. *See id.* ¶¶ 3, 32-35, 52-53, 58, 60. Those schools include the David Geffen School of Medicine at UCLA, *see id.* ¶¶ 34-35, 52, which is the medical school at issue in this case, *see, e.g.*, Dkt. 1 ¶¶ 1, 7-10, 30-48, 53-110. The FAC, like the Complaint in this case, alleges that UCLA’s medical school and its Associate Dean of Admissions discriminate against white and Asian applicants in favor of black applicants. *Compare SARD*, No. 8:25-cv-00192-JWH-JDE, Dkt. 26 ¶ 34, *with, e.g.*, Dkt. 1 ¶¶ 7, 9, 62, 131. Indeed, the FAC in *SARD* purports to incorporate in full Plaintiffs’ Complaint in this case. *See SARD*, No. 8:25-cv-00192-JWH-JDE, Dkt. 26 ¶ 34.²

¹ Under Local Rule 83-1.3.4, attorneys have a “continuing duty ... in any case to file a Notice of Related Cases” as required by the Local Rules. L.R. 83-1.3.4.

² Defendants include the foregoing allegations solely for the purpose of establishing that *SARD* and *Do No Harm* are related and in no way concede the truth of such allegations. Defendants reserve the right to move to dismiss both

1 Given these additions to the FAC, this case is now sufficiently related to
2 *SARD* to warrant transfer under any of the three factors that govern relatedness
3 under the Local Rules. *First*, both cases “arise from the same or a closely related
4 transaction, happening, or event,” L.R. 83-1.3.1(a)—i.e., alleged racial
5 discrimination by UCLA’s medical school and its Associate Dean of Admissions
6 in admissions practices and policies. *Second*, both cases “call for determination of
7 the same or substantially related or similar questions of law and fact,” L.R. 83-
8 1.3.1(b)—i.e., whether the Regents and individuals associated with UCLA’s
9 medical school, including the Chancellor of UCLA, are liable under Title VI, 42
10 U.S.C. § 1981, and/or the Equal Protection Clause for racial discrimination
11 allegedly committed by UCLA’s medical school and its Associate Dean of
12 Admissions. And *third*, for these reasons, these cases “would entail substantial
13 duplication of labor if heard by different judges.” L.R. 83-1.3.1(c).

14 Under the Local Rules, cases are related even when they satisfy only one of
15 these factors. *See* L.R. 83-1.3.1 (“It shall be the responsibility of the parties to
16 promptly file a Notice of Related Cases whenever two or more civil cases filed in
17 this District: (a) arise from the same or a closely related transaction, happening, or
18 event; (b) call for determination of the same or substantially related or similar
19 questions of law and fact; *or* (c) for other reasons would entail substantial
20 duplication of labor if heard by different judges.” (emphasis added)). Here, this
21 case and *SARD* are related under all three factors.

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27 complaints in their entirety, and to strike or otherwise object to the allegations
28 therein.

1 Dated: June 20, 2025

Respectfully submitted,

2 /s/ Felicia Ellsworth

3 Felicia Ellsworth

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