

CONSOVOY MCCARTHY PLLC

Thomas R. McCarthy (pro hac vice)
Bryan Weir (SBN 310964)
Cameron T. Norris (pro hac vice)
cam@consovoymccarthy.com
Frank H. Chang (pro hac vice)
Marie Sayer (pro hac vice)
1600 Wilson Blvd., Suite 700
Arlington, VA 22209
(703) 243-9423

LAWFAIR LLC

Adam K. Mortara (pro hac vice)
40 Burton Hills Blvd., Suite 200
Nashville, TN 37215
(773) 750-7154

ALTVIEW LAW GROUP LLP

John M. Begakis (SBN 278681)
john@altviewlawgroup.com
9454 Wilshire Blvd., Suite 825
Beverly Hills, CA 90212
(310) 230-5580

Attorneys for Plaintiffs

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

DO NO HARM et al.,

Plaintiffs,

v.

DAVID GEFFEN SCHOOL OF
MEDICINE AT UCLA, et al.,

Defendants.

Case No.: 2:25-cv-4131-MCS-JC

**RESPONSE TO NOTICE OF
RELATED CASES**

1 Plaintiffs take no position on Defendants’ notice of related case, except to make
2 two points: Judge Holcomb already determined that this case and *SARD* are not suf-
3 ficiently related. And if Defendants are correct that *SARD* became related only after
4 those plaintiffs amended their complaint, then any transfer should send *SARD* to
5 Judge Scarsi, not this case to Judge Holcomb.
6

7 **1.** When Plaintiffs filed this case, they flagged it as related to *SARD*. Doc.2. But
8 this case was assigned to Judge Scarsi, and Judge Holcomb declined transfer because
9 the two cases were “not sufficiently related.” Doc.32. Defendants do not challenge
10 Judge Holcomb’s decision. They claim that the cases’ relatedness changed when the
11 *SARD* plaintiffs amended their complaint to “now alleg[e] racial discrimination in ad-
12 missions at six University of California medical schools.” Doc.39 at 2. But the *SARD*
13 plaintiffs never excluded medical schools from their original complaint: They broadly
14 challenged graduate and undergraduate admissions at “all nine” UC campuses, includ-
15 ing San Francisco (which has a medical school but no law school). *E.g.*, *SARD*-Compl.
16 1, 14 ¶36, Doc.1, No. 8:25-cv-192 (C.D. Cal. Feb. 3, 2025). So Judge Holcomb’s initial
17 determination that the two cases are not related still seems to control as law of the
18 case. (And all this assumes that Defendants are correct that two cases can start as un-
19 related, but then become related enough to warrant transfer. *Cf.* Local Rule 83-1.3.1
20 (assessing relatedness based on when the related case was “filed”).)
21

22 **2.** Even under Defendants’ theory, the cases were not related when Plaintiffs
23 filed their complaint in May 2025, but became related when the *SARD* plaintiffs *later*
24
25
26
27
28

1 amended their complaint in June 2025. *See* Doc.39 at 3. If that theory works, then
2 Defendants do not explain why this case should be transferred to “Judge Holcomb”
3 in the Southern Division, rather than transferring *SARD* to Judge Scarsi in the Western
4 Division. Doc.39 at 2. Though this Court’s General Order 24-04 discusses transferring
5 to the “low number” case, that language assumes the related case was “later-filed” and
6 the original case was “previously filed.” §II.I.1. Here the “previously filed” case would
7 be this one, under Defendants’ theory.
8

9
10 For what it’s worth, transferring *SARD* to the Western Division would also be
11 more convenient for the parties and witnesses than transferring this case to the South-
12 ern Division. The Western Division contains four of the campuses that the *SARD*
13 plaintiffs are suing (Los Angeles, Riverside, and Santa Barbara), while the Southern
14 Division contains only one (Irvine). UC’s outside counsel is also based in Boston,
15 which has direct flights to LAX but none to Orange County.
16
17

18 Or instead of resolving these complicated questions about the local rules and
19 the need for transfer, this Court can stick with Judge Holcomb’s original decision and
20 leave both cases where they are.
21
22
23
24
25
26
27
28

1 Dated: June 24, 2025

Respectfully submitted,

/s/ Cameron T. Norris

3 **LAWFAIR LLC**

4 Adam K. Mortara (pro hac vice)
40 Burton Hills Blvd., Suite 200
5 Nashville, TN 37215
6 (773) 750-7154

7 *Attorney for Students for Fair*
8 *Admissions*

9 **ALTVIEW LAW GROUP LLP**

10 John M. Begakis (SBN 278681)
john@altviewlawgroup.com
11 9454 Wilshire Blvd., Suite 825
12 Beverly Hills, CA 90212
(310) 230-5580

13 *Local Counsel*

CONSOVOY MCCARTHY PLLC

Thomas R. McCarthy (pro hac vice)
Bryan Weir (SBN 310964)
Cameron T. Norris (pro hac vice)
cam@consovoymccarthy.com
Frank H. Chang (pro hac vice)
Marie Sayer (pro hac vice)
1600 Wilson Blvd., Suite 700
Arlington, VA 22209
(703) 243-9423

Attorneys for Do No Harm, Students for Fair
Admissions, Kelly Mahoney