

Randall Class Action Administrator
PO Box 4454
Portland, OR 97208-4454

LEGAL NOTICE

*This is a court-required notice. This is **not** a notice
from a lawyer trying to sell you anything.*

Randall v. United Network for Organ Sharing, et al.,
Case No. 2:23-cv-02576-MEMF-MAA,
U.S. District Court for the Central District of California

www.eGFRCClassAction.com

Why am I getting this notice?

You are getting this notice because you may be part of a group of people involved in a lawsuit. In a lawsuit like this, that group is called a “class,” and the people in it are called “class members.” Records suggest you may be one of them. This notice explains what the lawsuit is about, what your rights are, and the choices you can make.

What is the lawsuit about?

The people who brought the lawsuit contend that two organizations—the United Network for Organ Sharing (UNOS) and Cedars-Sinai Medical Center (Cedars-Sinai)—assessed or allowed for the assessment of Black patients’ kidney function scores differently because of their race.

Plaintiff contends UNOS and Cedars-Sinai used or allowed others to use a calculation (sometimes called the “race-based coefficient”) that made Black patients’ kidneys appear healthier than they really were. As a result, allegedly it may have taken longer for some Black patients to get on the kidney transplant waiting list, and some may have missed out on offers for donor kidneys.

The lawsuit claims this conduct violated a California anti-discrimination law called the Unruh Civil Rights Act. The lawsuit asks the court to order payment of at least \$4,000 for each time the discrimination happened, plus the lawyers’ fees and costs.

What do UNOS and Cedars-Sinai say?

UNOS and Cedars-Sinai contend they did what was in the patients’ best interest and did not violate California law. The court has not yet decided who is right.

Who is included in the lawsuit?

The court has officially approved the following group or groups of people as part of this case:

California Class: Black kidney disease patients registered on the national kidney transplant waitlist at California transplant hospitals, from 2000 to the present, that received or would have qualified for a wait time adjustment because a lab test shows that with a race-inclusive calculation, the candidate’s eGFR was over 20 mL/min, but with a race-neutral calculation it would have been 20 mL/min or less, given that the patients received a delay in their accrual of wait time, attributable to the race-conscious coefficient. Excluded from this class is any person filing an individual personal injury or wrongful death action.

Cedars Class: Black kidney disease patients registered on the national kidney transplant waitlist at Cedars-Sinai Medical Center, from 2000 to the present, that received or would have qualified for a wait time adjustment because a lab test shows that with race-inclusive calculation, the candidate’s eGFR was over 20 mL/min, but with a race neutral calculation it would have been 20 mL/min or less, given that the patients received a delay in their accrual of wait time, attributable to the race-conscious coefficient. Excluded from this class is any person filing an individual personal injury or wrongful death action.

If you are not sure whether you are included, you can contact the lawyer listed below to ask.

Is there a lawyer for the classes?

The court has appointed a lawyer to represent everyone in the classes. The lawyer is:

Matthew L. Venezia
Watstein Terepka LLP
999 N. Pacific Coast Hwy., Suite 525
El Segundo, CA 90254
Email: RandallClassAction@wtlaw.com
Phone: (213) 753-1337

If you have questions or want to talk about the case, you can contact him using the information above.

What are my choices?

You have three choices. Please read them carefully.

1. Do nothing and stay in the lawsuit.

If you do nothing, you stay in the group. You do not have to pay anything or hire your own lawyer. If the group wins or settles, you may be able to share in the result. You also choose not to sue UNOS and Cedars-Sinai on your own about this same issue, and you will be bound by the court’s decision.

2. Hire your own lawyer and take part on your own.

You may hire your own lawyer, at your own cost, and make an appearance in the case yourself.

3. Remove yourself from the lawsuit (“opt out”).

You may decide to remove yourself from this lawsuit. This is called “opting out.” If you opt out, you keep the right to file a separate lawsuit on your own, but you will not receive anything from this lawsuit.

To opt out, send your name and a statement that you want to be removed from this class action, either:

- by email to OptOut@eGFRClassAction.com, or
- by letter to Randall Class Action Administrator, PO Box 4454, Portland, OR 97208-4454

Your request must be received no later than **October 15, 2026.**

How do I get more information?

Contact the court-appointed lawyer for the classes, Matthew L. Venezia, using the contact information above or visit www.eGFRClassAction.com.