

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DO NO HARM,

*Plaintiff,*

v.

No. 2:25-cv-01435-CMR

THE UNIVERSITY OF  
PENNSYLVANIA HEALTH SYSTEM  
et al.,

*Defendants.*

**OFFER OF JUDGMENT**

Per Federal Rule of Civil Procedure 68, Defendants offer to allow judgment to be entered in this case for Plaintiff and against Defendants as follows:

1. Defendants offer to allow judgment to be entered against them in this action.
2. Defendant WURD, the Defendant who controls the Directory has, with the support of Defendants Penn Medicine and CDHE (“the Consortium”), changed the name of the “Black Doctors Directory” to the “Community Health and Wellness Directory” and shall only publicize the directory under that name or an equally race-neutral name. The directory is equally open to physicians regardless of race.
3. When determining whether to add a physician to the directory, Defendants will consider any licensed physician in the greater Philadelphia area who demonstrates a commitment to treating patients and communities historically and currently underserved. Defendants will determine whether a physician meets those criteria without inquiring about or considering the physician’s race.

4. The judgment shall award nominal damages in favor of Do No Harm in the amount of \$1.

5. Any issues regarding attorney fees or costs have been completely resolved between the parties by separate agreement. No party will take any other action to seek fees or costs.

6. The offer of judgment is made for purposes of Rule 68 only and may not be construed as an admission of liability by Defendants.

Dated: August 4, 2025

Respectfully submitted,

/s/ George Hazel

George Hazel (admitted *pro hac vice*)  
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**CERTIFICATE OF SERVICE**

I, James A. Keller, hereby certify that on August 4, 2025, the foregoing *Offer of Judgment* was served upon all counsel of record via electronic mail.

/s/ James A. Keller  
James A. Keller, Esq.