

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE (HARVARD CORPORATION)

Defendant.

Civil Action No. 1:14-cv-14176

**MOTION FOR LEAVE TO APPEAR *PRO HAC VICE***

Pursuant to Rule 83.5.3(b) of the Local Rules of United States District Court for the District of Massachusetts, Plaintiff, Students for Fair Admissions, Inc., by its attorneys, Paul M. Sanford and Benjamin C. Caldwell, move this Court to admit attorney Michael H. Park of Consovoy McCarthy Park PLLC, 3033 Wilson Boulevard, Suite 700, Arlington, Virginia 22201, to appear, defend, and practice *pro hac vice* as co-counsel on behalf of Students for Fair Admissions, Inc.

1. Attorney Michael H. Park is a partner in the law firm of Consovoy McCarthy Park PLLC. He is a member in good standing of the New York State Bar, the United States District Court for the Eastern District of New York, the United States District Court for the Southern District of New York, the United States Court of Appeals for the Second, Third and Eleventh Circuits, and the United States Supreme Court. There are no disciplinary proceedings pending against Mr. Park in any jurisdiction.

2. Mr. Park is familiar with the issues in this case and with the Local Rules of this Court.

3. Mr. Sanford and Mr. Caldwell are members in good standing of the Bar of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts and will continue to represent Students for Fair Admissions, Inc. if this motion is granted.

4. In support of this Motion, Students for Fair Admissions, Inc. relies upon the Certification of Mr. Park filed herewith.

**WHEREFORE**, Students for Fair Admissions, Inc. respectfully requests that this Court admit attorney Michael H. Park to appear, defend, and practice *pro hac vice* as co-counsel on behalf of Students for Fair Admissions, Inc.

Dated: September 28, 2015

Respectfully submitted,

s/ Paul M. Sanford  
s/ Benjamin C. Caldwell  
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*Attorneys for Plaintiff  
Students for Fair Admissions, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

s/ Paul M. Sanford  
Paul M. Sanford

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