UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION

STUDENTS FOR FAIR ADMISSIONS, INC.,

                Plaintiff,

    v.

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE,

                Defendant.

Civil Action No. 1:14-cv-14176-ADB

DECLARATION OF FELICIA H. ELLSWORTH
IN SUPPORT OF EMERGENCY MOTION FOR PROTECTIVE ORDER AND A
TEMPORARY STAY OF DEPOSITIONS

I, Felicia H. Ellsworth, hereby state under oath:

1.   I am a member in good standing of the bar of the Commonwealth of Massachusetts and this Court, and am a partner at the firm of Wilmer Cutler Pickering Hale and Dorr LLP. I am one of the attorneys representing the Defendant President and Fellows of Harvard College ("Harvard") in the above-captioned matter. I submit this declaration in connection with the Emergency Motion of Defendant President and Fellows of Harvard College to Stay Depositions.

2.   Attached hereto as Exhibit 1 is a true and accurate copy of the amended deposition notice for former Harvard employee Caroline Weaver.

3.   Attached hereto as Exhibit 2 is a true and accurate copy of the subpoena to testify at a deposition for Ms. Weaver.

4.   Attached hereto as Exhibit 3 is a true and accurate copy of the deposition notice for Harvard employee Tia Ray.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 30th day of September, 2015.

                                        /s/ Felicia H. Ellsworth
                                        Felicia H. Ellsworth (BBO #665232)
                                        WILMER CUTLER PICKERING
                                          HALE AND DORR LLP
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Dated: September 30, 2015   *Counsel for Defendant President and*
                                        Fellows of Harvard College and Former Employee
                                        Caroline Weaver

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be sent to those indicated as non-registered participants on September 30, 2015.

/s/ Felicia H. Ellsworth
Felicia H. Ellsworth