

Exhibit 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

STUDENTS FOR FAIR ADMISSIONS,)	
INC.,)	
)	
Plaintiffs,)	
)	JOINT STIPULATION AND
v.)	MOTION TO AMEND
)	PROTECTIVE ORDER
THE UNIVERSITY OF NORTH)	
CAROLINA AT CHAPEL HILL, et al.,)	
)	
Defendants.)	
)	
)	

JOINT STIPULATION AND MOTION TO AMEND PROTECTIVE ORDER

Plaintiff Students for Fair Admissions, Inc. and Defendants The University of North Carolina at Chapel Hill, et al. respectfully request that the Court enter this Stipulation and modify the existing Protective Order.

Plaintiff’s First Request for the Production of Documents seeks production of a preliminary sample of undergraduate application files for applicants seeking admission to The University of North Carolina at Chapel Hill as well as related applicant information stored in electronic databases. The parties have met and conferred regarding this topic and stipulate and agree as follows:

1. The parties agree that this Stipulation should be entered as an Order of the Court.

2. Defendants will produce redacted versions of 625 application files from two admissions cycles (for a total of 1,250 files).¹
3. Defendants will also produce certain redacted data from electronic databases for the same admissions cycles. The parties have also agreed that the Protective Order should be modified to provide additional protection that will enable Defendants to produce these materials, which are necessary to this litigation.
4. In producing these materials pursuant to the Protective Order, Defendants represent that their production of the application files and certain data from electronic databases also will comply with the requirements of the Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g, and its implementing regulations, 34 C.F.R. pt. 99 and North Carolina General Statutes § 132-1.1(f).

Accordingly, the parties jointly respectfully request that the Court enter the proposed Amended Protective Order, attached hereto as Exhibit 1.

¹ Notwithstanding this agreement, Plaintiff reserves all rights to request additional application files. Defendants reserve all rights to oppose any such request and to object to the characterization of 625 application files from two admissions cycles as a “preliminary” sample.

Respectfully submitted this 28th day of August, 2015.

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This matter having come before the Court upon the Stipulation of the parties hereto and the Court having reviewed the Stipulation of the parties and being fully advised;

It is hereby Ordered that the terms of the Stipulation of the Parties set forth above is hereby entered as an Order of this Court on this ___ day of _____, 2015.

Judge

CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2015, I filed a true and correct copy of the foregoing JOINT STIPULATION AND MOTION TO AMEND PROTECTIVE ORDER with the Clerk of Court using the CM/ECF system.

This 28th day of August, 2015

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