

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

STUDENTS FOR FAIR ADMISSIONS,  
INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE (HARVARD  
CORPORATION),

Defendant.

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

**\*\*\*Exhibit A to this Motion is an unredacted letter subject to a Protective Order of this Court and cannot be made available to anyone other than counsel of record for the parties or Court personnel.\*\*\***

**PLAINTIFF'S MOTION TO IMPOUND**

Pursuant to Local Rule 7.2 and this matter's Stipulated Protective Order (Dkt. No. 55), Plaintiff, Students for Fair Admissions, Inc. ("SFFA"), hereby brings this motion to give this Honorable Court the option to impound the attached unredacted letter from Plaintiff's counsel to Judge Burroughs dated February 1, 2016 (*Exhibit A* - the "Letter"). The Letter contains information which has been designated by Defendant, the President and Fellows of Harvard College ("Harvard") as "protected material" under the Stipulated Protective Order. This motion is brought in reaction to Harvard's designations. A redacted version of the Letter has been publicly filed in which discussion and references to the designated "protected material" were redacted.

WHEREFORE, SFFA respectfully submits this motion which gives the Court the option to allow the unredacted version of the Letter to be impounded and to be viewed only by the Judge, her clerk(s) and Court personnel.

Respectfully submitted,

By: /s/ Patrick Strawbridge  
Patrick Strawbridge

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Dated: February 1, 2016

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*Counsel for Plaintiff Students for Fair  
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**CERTIFICATE OF CONFERENCE**

In accordance with Local Rules 7.1(a), I hereby certify that this motion is brought in reaction to Harvard's designation of certain database fields and other information as "protected material" under the Stipulated Protected Order.

/s/ Patrick Strawbridge  
Patrick Strawbridge

**CERTIFICATE OF SERVICE**

In accordance with Local Rule 5.2(b), I hereby certify that this document was filed through the Court's ECF system on February 1, 2016 and will be sent electronically to the registered participants identified on the Notice of Electronic Filing. The attachment to this motion was hand-delivered to the Court (and not publicly filed).

/s/ Benjamin C. Caldwell  
Benjamin C. Caldwell

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