

**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

PLAINTIFF’S ASSENTED-TO MOTION TO FILE UNDER SEAL

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 assented-to motion seeking an order to file under seal unredacted versions of the following documents which SFFA will soon be filing: (1) Opposition to Defendant’s Motion for Judgment on the Pleadings on Counts IV and VI (the “MJP Opposition”), (2) the exhibit to the Declaration of William S. Consovoy in support of the MJP Opposition (“Consovoy MJP Declaration”), (3) Opposition to Defendant’s Motion to Dismiss for Lack of Subject Matter Jurisdiction (the “MTD Opposition”), and (4) the Declaration of Williams S. Consovoy in support of the MTD Opposition and certain exhibits thereto (“Consovoy MTD Declaration”). These documents contain information that has been designated by SFFA and/or Defendant as Confidential and/or Highly Confidential – Attorneys’ Eyes Only pursuant to the Stipulated Protected Order. Pursuant to Local Rule 7.1(a)(2), Harvard was made aware of this motion and assents to it.

WHEREFORE, SFFA respectfully requests that the Court grant this motion and allow the MJP Opposition, an exhibit to the Consovoy MJP Declaration, the MTD Opposition, as well as

the Consvooy MTD Declaration and certain exhibits thereto, to be filed under seal until further order of the Court and to be viewed only by the Judge, her clerk(s), and Court personnel.

Respectfully submitted,

By: /s/ Benjamin C. Caldwell

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Dated: October 20, 2016

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Counsel for Plaintiff Students for Fair Admissions, Inc.

CERTIFICATE OF CONFERENCE

In accordance with Local Rules 7.1(a), I hereby certify that Defendant's counsel was made aware of this motion before it was filed and assents to the relief requested therein.

/s/ Benjamin C. Caldwell

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to all counsel of record via the CM/ECF system.

/s/ Benjamin C. Caldwell

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