

**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 UNOPPOSED MOTION TO FILE UNDER SEAL PLAINTIFF'S
UNREDACTED LETTER REGARDING DISCOVERY DISPUTE**

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 a letter from SFFA to the Court which seeks to resolve a dispute concerning Defendant's confidentiality designations for documents produced in this matter to date (the "Letter"). Included with the Letter are an appendix and copies of the underlying documents, which SFFA also seeks to file under seal. This Letter, its appendix and the underlying documents contain information that that has been designated by Defendant as Confidential and/or Highly Confidential – Attorneys' Eyes Only pursuant to the Stipulated Protected Order. Pursuant to Local Rule 7.1(a)(2), Defendant was made aware of this motion and assents to it.

SFFA is delivering to the Court an unredacted courtesy copy of the Letter, its appendix and the underlying documents in two binders (along with a CD containing the same). SFFA requests that the unredacted documents subject to this motion be impounded until further order of the Court.

WHEREFORE, SFFA respectfully requests that the Court grant this motion and allow the Letter, its appendix and underlying documents 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: November 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 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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