

**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 FOR LEAVE TO FILE REPLY
MEMORANDA IN SUPPORT OF ITS TWO PENDING MOTIONS TO COMPEL**

Pursuant to Local Rule 7.1(b)(3), Plaintiff, Students for Fair Admissions, Inc. (“SFFA”), respectfully moves for leave to submit reply memoranda in support of (1) SFFA’s Motion to Compel Production of Reviewer Comments (“Reviewer Comments Motion”) and (2) SFFA’s Motion to Compel Production of Applicant Zip Codes (“Applicant Zip Codes Motion”).¹

A reply memorandum for each of these pending motions is warranted to address certain assertions and arguments in Defendant’s oppositions which require a response. Pursuant to Local Rule 7.1(a)(2), Defendant was made aware of this motion and assents to it. If this motion is granted, SFFA shall submit its reply memoranda by January 4, 2017.

WHEREFORE, SFFA respectfully requests that the Court grant its motion for leave to file reply memoranda in support of the Reviewer Comments Motion and the Applicant Zip Codes Motion.

¹ Both underlying motions to compel (including SFFA’s accompanying memoranda) were filed under seal on December 6, 2016, per court order (Dkt. 223). Harvard’s oppositions to each motion were also filed under seal on December 20, 2016, per court order (Dkt. 232).

Respectfully submitted,

By: /s/ Benjamin C. Caldwell

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Counsel for Plaintiff Students for Fair
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CERTIFICATE OF CONFERENCE

In accordance with Local Rule 7.1(a)(2), 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 the registered participants as identified on the Notice of Electronic Filing.

/s/ Benjamin C. Caldwell

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