

**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  
PLAINTIFF’S REPLY MEMORANDA  
IN SUPPORT OF ITS TWO MOTIONS TO COMPEL**

Pursuant to Local Rule 7.2 and this matter’s Stipulated Protective Order (Dkt. No. 55), Plaintiff, Students for Fair Admissions, Inc. (“SFFA”), hereby moves this Court for an order sealing in their entirety (1) SFFA’s Reply Memorandum in Support of its Motion to Compel Production of Reviewer Comments and (2) SFFA’s Reply Memorandum in Support of its Motion to Compel Production of Applicant Zip Codes and accompanying declaration from Richard Kahlenberg.<sup>1</sup> These upcoming filings will contain substantial information that has been designated by Defendant as Confidential and/or Highly Confidential – Attorneys’ Eyes Only pursuant to the Stipulated Protective Order. To comply with Defendant’s designations, SFFA requests an order that allows the reply memoranda, all accompanying exhibits and the Kahlenberg declaration to be filed under seal in their entirety. Pursuant to Local Rule 7.1(a)(2), Defendant was aware of this motion and assents to it.

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<sup>1</sup> The Court has previously granted SFFA’s assented-to motion for leave to file these replies. See Dkt. 237.

WHEREFORE, SFFA respectfully requests that the Court grant this motion and allow the reply memoranda, all accompanying exhibits and the Kahlenberg declaration 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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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

4830-8538-8096.1