

**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
MOTION FOR A PROTECTIVE ORDER AND TO QUASH DEPOSITION NOTICES**

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 motion for a protective order and to quash two deposition notices—a motion that SFFA soon will be filing. SFFA’s motion will seek to quash the noticed depositions of two of its officers. The motion will contain information that has been designated as Confidential and/or Highly Confidential – Attorneys’ Eyes Only under the Stipulated Protective Order. SFFA requests an order that allows the motion, as well as all accompanying filings in support (including exhibits), 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.

WHEREFORE, SFFA respectfully requests that the Court grant this motion and allow SFFA’s motion for a protective order and to quash deposition notices, as well as all accompanying filings in support (including exhibits), 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: March 21, 2017

Counsel for Plaintiff SFFA

CERTIFICATE OF CONFERENCE

In accordance with Local Rule 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