

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE (HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**HARVARD'S ASSENTED-TO MOTION TO FILE UNDER SEAL  
HARVARD'S OPPOSITION TO SFFA'S MOTION TO QUASH SUBPOENAS AND  
DEPOSITION NOTICES OR FOR A PROTECTIVE ORDER**

Pursuant to Local Rule 7.2 and the Stipulated Protective Order (Dkt. 55), Defendant President and Fellows of Harvard College (“Harvard”) hereby moves this Court for an order sealing in its entirety Harvard’s Opposition to Plaintiff’s Motion to Quash Subpoenas and Deposition Notices or for a Protective Order. This document includes information designated as Confidential or Highly Confidential – Attorneys’ Eyes Only pursuant to the Stipulated Protective Order (Dkt. 55), including information disclosing the identities of members of Students for Fair Admissions, Inc. (“SFFA”). Harvard’s Opposition will be filed in response to SFFA’s Motion to Quash Subpoenas and Deposition Notices or for a Protective Order, which was filed under seal (Dkt. 254). Pursuant to Local Rule 7.1(a)(2), SFFA was made aware of this motion and assents to it.

Harvard requests that the document subject to this Motion be impounded until further order of the Court. In the event the Court has not previously ordered otherwise, Harvard’s submission should be returned to its undersigned counsel upon resolution of this matter.

WHEREFORE, Harvard respectfully requests that the Court grant this motion and allow Harvard's Opposition to Plaintiff's Motion to Quash Subpoenas and Deposition Notices or for a Protective Order, to be filed under seal and to be viewed only by the Judge, her clerk(s), and Court personnel.

Respectfully submitted,

/s/ Felicia H. Ellsworth

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Dated: March 28, 2017

*Counsel for Defendant President and  
Fellows of Harvard College*

**CERTIFICATE OF CONFERENCE**

In accordance with Local Rule 7.1(a)(2), I hereby certify that Students for Fair Admissions' counsel was made aware of this motion before it was filed and assents to Harvard's request to file its Opposition to Plaintiff's Motion to Quash Subpoenas and Deposition Notices or for a Protective Order under seal.

/s/ Felicia H. Ellsworth  
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**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/ Felicia H. Ellsworth  
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