

**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 A REPLY
MEMORANDUM IN SUPPORT OF ITS MOTION FOR A PROTECTIVE ORDER AND
TO QUASH DEPOSITION NOTICES**

Pursuant to Local Rule 7.1(b)(3), Plaintiff, Students for Fair Admissions, Inc. (“SFFA”), respectfully moves for leave to submit a reply memorandum in support of SFFA’s Motion for a Protective Order and to Quash Deposition Notices (the “Motion”).¹ The Motion seeks to quash the depositions of two of SFFA’s officers. A reply memorandum for the Motion is warranted to address certain assertions and arguments in Defendant’s opposition 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 memorandum by April 12, 2017.

WHEREFORE, SFFA respectfully requests that the Court grant its motion for leave to file a reply memorandum in support of the Motion.

¹ The Motion (including SFFA’s accompanying memorandum) was filed under seal on March 22, 2017, per court order (Dkt. 259). Harvard’s opposition to the Motion was also filed under seal on April 5, 2017, per court order (Dkt. 269).

Respectfully submitted,

By: /s/ Benjamin C. Caldwell

Paul M. Sanford BBO #566318
Benjamin C. Caldwell BBO #675061
BURNS & LEVINSON LLP
One Citizens Plaza, Suite 1100
Providence, RI 02903
Tel: 617-345-3000
Fax: 617-345-3299
psanford@burnslev.com
bcaldwell@burnslev.com

William S. Consovoy
Thomas R. McCarthy
Michael H. Park
J. Michael Connolly
CONSOVOY MCCARTHY PARK PLLC
3033 Wilson Boulevard, Suite 700
Arlington, Virginia 22201
Tel: 703-243-4923
Fax: 703.243.4923
will@consovoymccarthy.com
tom@consovoymccarthy.com
park@consovoymccarthy.com
mike@consovoymccarthy.com

Dated: April 10, 2017

Patrick Strawbridge BBO #678274
CONSOVOY MCCARTHY PARK PLLC
Ten Post Office Square
8th Floor South PMB #706
Boston, MA 02109
Tel: 617-227-0548
patrick@consovoymccarthy.com

Counsel for Plaintiff Students for Fair
Admissions, Inc.

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