

**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 LETTER MOTION REGARDING DEPOSITIONS AND CUSTODIANS

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 letter motion addressing the amount of depositions to be taken by SFFA going forward in this matter and SFFA's request for additional custodians based on recent discovery (the "Letter Motion"). The Letter Motion 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 Letter Motion, and all documents in support, to be filed under seal in its 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 the Letter Motion, along with all accompanying documents in support, 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 SFFA

Dated: April 11, 2017

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

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