

**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 OPPOSITIONS TO SFFA'S MOTIONS TO COMPEL**

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 their entirety Harvard's Opposition to Plaintiff's Motion to Compel the Production of Unredacted Documents and Harvard's Opposition to Plaintiff's Renewed Motion to Compel the Production of Application Files. These documents include information designated as Confidential or Highly Confidential – Attorneys' Eyes Only pursuant to the Stipulated Protective Order (Dkt. 55). Harvard's Oppositions will be filed in response to SFFA's Motion to Compel the Production of Unredacted Documents and Renewed Motion to Compel the Production of Application Files, which were filed under seal (Dkt. 279). Pursuant to Local Rule 7.1(a)(2), SFFA was made aware of this motion and assents to it.

Harvard requests that the documents 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 Oppositions to Plaintiff's Motion to Compel the Production of Unredacted Documents and Renewed Motion to Compel the Production of Application Files 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

Felicia H. Ellsworth (BBO #665232)
William F. Lee (BBO #291960)
Andrew S. Dulberg (BBO #675405)
Elizabeth Mooney (BBO #679522)
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
Tel: (617) 526-6000
Fax: (617) 526-5000
william.lee@wilmerhale.com
felicia.ellsworth@wilmerhale.com
andrew.dulberg@wilmerhale.com
elizabeth.mooney@wilmerhale.com

Seth P. Waxman (*pro hac vice*)
Paul R.Q. Wolfson (*pro hac vice*)
Daniel Winik (*pro hac vice*)
WILMER CUTLER PICKERING
HALE AND DORR LLP
1875 Pennsylvania Ave. NW
Washington, D.C. 20006
Tel: (202) 663-6800
Fax: (202) 663-6363
seth.waxman@wilmerhale.com
paul.wolfson@wilmerhale.com
daniel.winik@wilmerhale.com

Debo P. Adegbile (*pro hac vice*)
WILMER CUTLER PICKERING
HALE AND DORR LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
Tel: (212) 295-6717

Fax: (212) 230-8888
debo.adegbile@wilmerhale.com

Dated: April 18, 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 Compel the Production of Unredacted Documents and its Opposition to Plaintiff's Renewed Motion to Compel the Production of Application Files under seal.

/s/ Felicia H. Ellsworth
Felicia H. Ellsworth

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
Felicia H. Ellsworth