

**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 RESPONSE LETTER TO SFFA'S APRIL 12, 2017**  
**LETTER MOTION REGARDING DEPOSITIONS AND CUSTODIANS**

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 Response Letter to SFFA's April 12, 2017 Letter Motion Regarding Depositions and Custodians. This document refers to information designated as Confidential or Highly Confidential – Attorneys' Eyes Only pursuant to the Stipulated Protective Order (Dkt. 55). Harvard's Letter will be filed in response to SFFA's April 12, 2017 Letter, which was filed under seal (Dkt. 283). 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 Response Letter to SFFA's April 12, 2017 Letter Motion Regarding Depositions and

Custodians 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 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, Inc.'s counsel was made aware of this motion before it was filed and assents to Harvard's request to file its Response Letter to SFFA's April 12, 2017 Letter Motion Regarding Depositions and Custodians 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