

**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 REQUESTING THE PRODUCTION OF**  
**PERFORMANCE REPORTS BY ETHNICITY**

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 which seeks the production of reports Defendant has prepared regarding its students' areas of concentration, academic performance and academic preparation by ethnicity (the "Letter Motion"). The Letter Motion will contain substantial information that has been designated as Confidential and/or Highly Confidential – Attorneys' Eyes Only pursuant to the Stipulated Protective Order. To comply with those 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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Dated: May 19, 2017

Counsel for Plaintiff SFFA

**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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