

**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
REPLY LETTER IN SUPPORT OF 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 reply letter in support of SFFA's letter motion which was filed under seal on May 22, 2017. Through that letter motion SFFA requests that the Court compel Defendant to produce reports Defendant has prepared regarding its students' areas of concentration, academic performance and academic preparation by ethnicity. This reply letter will address certain assertions and arguments in Defendant's response letter which was filed under seal on June 14, 2017. Like the original letter motion, this reply letter will contain 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 reply letter and any accompanying exhibits 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 reply letter and any accompany exhibits 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: June 16, 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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