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),

Civil Action No. 1:14-cv-14176-ADB

Defendant.

HARVARD'S ASSENTED-TO MOTION TO FILE UNDER SEAL HARVARD'S LETTER TO THE COURT REGARDING JUNE 6, 2017 DISCOVERY ORDER

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 Letter to the Court Regarding June 6, 2017 Discovery Order. This document refers to and attaches 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 the Court's June 6, 2017 sealed discovery order (Dkt. 326). 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 Letter to the Court Regarding June 6, 2017 Discovery Order 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

Counsel for Defendant President and Fellows of Harvard College

Dated: June 21, 2017

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 Letter to the Court Regarding June 6, 2017 Discovery Order 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