

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE,

Defendant.

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

JOINT MOTION FOR ENTRY OF AMENDED SCHEDULING ORDER

Plaintiff Students for Fair Admissions, Inc. (“SFFA”) and Defendant President and Fellows of Harvard College (“Harvard”) hereby jointly move this Court for entry of an amended scheduling order.

On September 1, 2016, the Court entered an Amended Scheduling Order governing fact discovery, expert discovery, and dispositive motions. Dkt. 180. On June 6, 2017, the Court extended the deadline for fact discovery from June 20, 2017, to August 4, 2017. To reflect that extension, the parties jointly seek an order revising the expert discovery and dispositive motion schedule as follows:

1. Plaintiff’s experts shall be designated and the information required by Fed. R. Civ. P. 26(a)(2) shall be disclosed by October 3, 2017.
2. Defendant’s experts shall be designated and the information required by Fed. R. Civ. P. 26(a)(2) shall be disclosed by December 2, 2017.
3. Plaintiff’s rebuttal expert reports shall be disclosed by January 16, 2018.
4. Defendant’s rebuttal expert reports shall be disclosed by February 26, 2018.

5. All expert discovery, including expert depositions, shall be completed by May 1, 2018.

6. All dispositive motions under Fed. R. Civ. P. 56 shall be filed by June 15, 2018. Opposition briefs shall be filed by July 30, 2018. Reply briefs shall be filed by August 30, 2018.

SFFA and Harvard respectfully request that the Court enter a revised scheduling order as described above.

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
felicia.ellsworth@wilmerhale.com
william.lee@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: June 27, 2017

*Counsel for Defendant President and
Fellows of Harvard College*

Paul M. Sanford BBO #566318
Benjamin C. Caldwell BBO #675061
BURNS & LEVINSON LLP
One Citizens Plaza, Suite 1100
Providence, RI 02903
Tel: 617-345-3000
Fax: 617-345-3299
psanford@burnslev.com
bcaldwell@burnslev.com

/s/ Patrick Strawbridge
William S. Consovoy
Thomas R. McCarthy
Michael H. Park
J. Michael Connolly
CONSOVOY MCCARTHY PARK PLLC
3033 Wilson Boulevard, Suite 700
Arlington, Virginia 22201
Tel: 703-243-4923
Fax: 703.243.4923
will@consovoymccarthy.com
tom@consovoymccarthy.com
park@consovoymccarthy.com
mike@consovoymccarthy.com

Patrick Strawbridge BBO #678274
CONSOVOY MCCARTHY PARK PLLC
Ten Post Office Square
8th Floor South PMB #706
Boston, MA 02109
Tel: 617-227-0548
patrick@consovoymccarthy.com

Dated: June 27, 2017

*Counsel for Plaintiff Students for Fair
Admissions, Inc.*

CERTIFICATE OF CONFERENCE

In accordance with Local Rule 7.1(a)(2), I hereby certify that SFFA joins in this motion and consents to the requested relief.

/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