

**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 REQUEST FOR RELIEF

Pursuant to Local Rule 7.2 and this matter’s Stipulated Protective Order (Dkt. No. 55), Plaintiff, Students for Fair Admissions, Inc. (“SFFA”), hereby moves this Court for an order sealing in its entirety SFFA’s soon-to-be-filed letter request seeking authority for SFFA to take a half-day deposition of a newly discovered witness (a former employee of Defendant) as soon as the witness is available. Defendant has objected to this deposition going forward. This upcoming filing will consist of a two-page letter that contains information that has been designated by Defendant 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 request 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 request for relief 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: August 1, 2017

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Counsel for Plaintiff Students for Fair
Admissions, Inc.

CERTIFICATE OF CONFERENCE

In accordance with Local Rules 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

4835-0052-0012.1