

**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 PLAINTIFF’S
AUGUST 1, 2017 LETTER TO THE COURT**

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 its reply letter in support of its letter request filed under seal on August 1, 2017, through which SFFA seeks authority to take one additional half-day deposition of a newly discovered witness. This reply letter will address certain assertions and arguments in Defendant’s response letter which was filed under seal on August 2, 2017. Like the original letter request, this reply letter will contain 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 reply letter 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 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 3, 2017

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Counsel for Plaintiff Students for Fair
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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

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