# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

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 OPPOSITION TO SFFA'S MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS WITHHELD OR REDACTED

Pursuant to Local Rule 7.2 and the Stipulated Protective Order (Dkt. 55), Defendant

President and Fellows of Harvard College (Harvard Corporation) ("Harvard") hereby moves this

Court for an order sealing in its entirety Harvard's Opposition to Students for Fair Admissions,

Inc.'s ("SFFA") Motion to Compel the Production of Documents Withheld or Redacted. This

document refers to information designated as Confidential or Highly Confidential—Attorneys'

Eyes Only pursuant to the Stipulated Protective Order (Dkt. 55). Harvard's Opposition will be

filed in response to SFFA's Motion to Compel the Production of Documents Withheld or

Redacted, which was filed under seal (Dkt. 366). Pursuant to Local Rule 7.1(a)(2), SFFA was

made aware of this motion before it was filed, and it assents to this motion.

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 Opposition to SFFA's Motion to Compel the Production of Documents Withheld or Redacted 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

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Counsel for Defendant President and Fellows of Harvard College Dated: January 17, 2018

## **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.

/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