# 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),

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

## JOINT MOTION TO SEAL CERTAIN INFORMATION FILED IN CONNECTION WITH THE PARTIES' SUMMARY JUDGMENT MOTIONS

Pursuant to Local Rule 7.2, the Stipulated Protective Order (Dkt. 55), and this Court's recent order adopting the parties' proposed briefing schedule for resolving disputes relating to confidentiality (Dkt. 409), the parties jointly move this Court for an order sealing (1) portions of the memoranda of law filed in support of their motions for summary judgment; (2) portions of the statements of material fact filed in connection with their motions for summary judgment; and (3) all or part of several of the exhibits filed in connection with their motions for summary judgment. The parties request that any documents filed under seal on June 15 be impounded until further order of the Court.

The parties have met and conferred and determined which materials must be subject to this initial sealing order because one party has indicated the materials must be filed under seal. In accordance with the schedule set by this Court (Dkts. 408, 409), the party seeking to seal material that is the subject of this motion will file a Memorandum of Law in support of this motion on June 22, 2018.

WHEREFORE, the parties respectfully request that the Court grant this motion and that any documents filed under seal on June 15 be impounded until further order of the Court, such that they may be viewed only by the Judge, her clerk(s), and Court personnel in conjunction with the parties' motion for summary judgment.

Respectfully submitted,<br>/s/ Felicia H. Ellsworth<br>Felicia H. Ellsworth (BBO \#665232)<br>William F. Lee (BBO \#291960)<br>WILMER CUTLER PICKERING<br>HALE AND DORR LLP<br>60 State Street<br>Boston, MA 02109<br>Tel: (617) 526-6687<br>Fax: (617) 526-5000<br>felicia.ellsworth@wilmerhale.com<br>Seth P. Waxman (pro hac vice)<br>Paul R.Q. Wolfson (pro hac vice)<br>Daniel Winik (pro hac vice)<br>WILMER CUTLER PICKERING<br>HALE AND DORR LLP<br>1875 Pennsylvania Ave. NW<br>Washington, D.C. 20006<br>Tel: (202) 663-6800<br>Fax: (202) 663-6363<br>seth.waxman@wilmerhale.com<br>paul.wolfson@wilmerhale.com<br>Debo P. Adegbile (pro hac vice)<br>WILMER CUTLER PICKERING<br>HALE AND DORR LLP<br>7 World Trade Center<br>250 Greenwich Street<br>New York, NY 10007<br>Tel: (212) 295-6717<br>Fax: (212) 230-8888<br>debo.adegbile@wilmerhale.com<br>Counsel for Defendant President and<br>Fellows of Harvard College

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Dated: June 13, 2018

## 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

