

EXHIBIT 15

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MASSACHUSETTS
3 BOSTON DIVISION
4

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

6 DEPOSITION OF: [REDACTED] - June 16, 2017

7
8 STUDENTS FOR FAIR ADMISSIONS, INC.,

9 Plaintiff,

10 v.

11 PRESIDENT AND FELLOWS OF HARVARD COLLEGE

12 (HARVARD CORPORATION),

13 Defendant.
14

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16 PURSUANT TO NOTICE AND SUBPOENA, the
17 deposition of [REDACTED] was taken on behalf of the
18 Defendant at 1225 17th Street, Suite 2600, Denver,
19 Colorado 80202, on June 16, 2017, at 8:54 a.m., before
20 Sherry Wallin, Certified Realtime Reporter, Registered
21 Merit Reporter and Notary Public within Colorado.
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1 offerings for upperclassmen?

2 A. Not as thoroughly, but yes.

3 Q. Are there any specific courses you are
4 thinking of taking at [REDACTED]?

5 A. I have some in mind. For example --
6 obviously the courses required for the computer
7 science major. I -- there aren't any very specific
8 courses I'm thinking of. Like I've looked more at the
9 major and minor than I have at specific courses.

10 Q. Understood. Are there any professors
11 you are looking forward to studying with at [REDACTED]?

12 A. Not in particular.

13 Q. Are there any extracurricular activities
14 you intend to participate in at [REDACTED]?

15 A. Possibly. Especially, like, the
16 Computer Science Club and [REDACTED] Quiz Bowl, but I have
17 decided to basically make those decisions once I get
18 there, for the most part.

19 Q. That makes sense. Are there any student
20 groups at [REDACTED] that you anticipate joining?

21 A. Again, those same clubs.

22 Q. Sitting here today, do you expect that
23 you will graduate from [REDACTED] in the spring of 2021?

24 A. I hope so, yes.

25 Q. Do you intend to apply to transfer from

1 [REDACTED] to any other college or university?

2 A. I don't anticipate that at the moment,
3 no.

4 Q. [REDACTED], has [REDACTED] offered
5 you any scholarship?

6 A. No.

7 Q. Has [REDACTED] offered you any merit-based
8 financial award?

9 A. No. I did win the National Merit
10 Scholarship, but that applies to any university. So
11 it's not through [REDACTED]

12 MR. DULBERG: All right. I think we've
13 been going for a little under an hour. Why don't we
14 take a quick break.

15 MR. PARK: Yeah. That sounds good.

16 MR. DULBERG: Thank you.

17 (Recess taken, 9:43 a.m. to 10:00 a.m.)

18 Q. (BY MR. DULBERG) During the break,
19 [REDACTED], did you discuss the deposition with your
20 attorney?

21 A. Briefly.

22 Q. And what did you discuss?

23 A. I just asked him if I was doing well,
24 and he said yes, I should just slow down a little bit.

25 Q. Always good advice.

1 reimburse?

2 A. No.

3 Q. What's your understanding of the current
4 status of this case?

5 A. So --

6 MR. PARK: Objection. I just want to
7 warn you, like, not the contents of what we have
8 discussed about the case, but, you know, your
9 understanding without revealing, you can discuss.

10 A. So as I mentioned, I've been following
11 the case on Justia docket's website, and I understand
12 that the case is in discovery, so both sides are
13 asking for -- each side is asking for evidence from
14 the other side, including -- that's what this
15 deposition is part of, and I know that later next year
16 the judge will either decide the case or hold a trial.

17 Q. (BY MR. DULBERG) That information that
18 you just described is based on your review of publicly
19 available information in this case; is that correct?

20 A. Yes.

21 Q. Have you ever voted to elect anyone who
22 has any role with respect to SFFA?

23 MR. PARK: Instructing the witness not
24 to answer the question, concerns SFFA's governance and
25 your rights as a member of SFFA.

1 A. I don't know of anyone who I know is a
2 member. There may be people who I know who happen to
3 be members, but I don't know that they're members.

4 Q. (BY MR. DULBERG) Have you ever attended
5 a meeting of SFFA?

6 MR. PARK: You can answer that. You can
7 answer.

8 A. No, I have not. Actually, I should
9 revise that. I was on a phone conference for SFFA
10 this past December.

11 Q. (BY MR. DULBERG) Is that a phone
12 conference that was open to all SFFA members, to the
13 best of your knowledge?

14 A. It was. All SFFA members received an
15 email a couple days before that stating there will be
16 this phone conference, dial in if you want to attend
17 it, and so I did.

18 Q. Was that the only time you were invited
19 to participate in a phone conference that all SFFA
20 members were invited to?

21 A. Yes.

22 Q. Do you know whether there have been any
23 other phone conferences of SFFA members as a whole?

24 A. I don't think there have been any
25 because, as I said, I have been a member since

1 November 2014, with my email address on the list. So
2 I should have been contacted if there were others.

3 Q. Do you know if there has ever been a
4 meeting of all SFFA members that you could have
5 attended?

6 MR. PARK: Objection.

7 A. I don't know of any such meeting, no.

8 Q. (BY MR. DULBERG) To the best of your
9 knowledge, there have been no such meetings, correct?

10 MR. PARK: Objection.

11 A. To the best of my knowledge, yes, there
12 have not been.

13 MR. DULBERG: Let's mark the next
14 exhibit.

15 (Deposition Exhibit 2 was marked.)

16 Q. (BY MR. DULBERG) Showing you what's
17 been marked as Exhibit 2, this is a document entitled
18 Re: Annual Report of Students for Fair Admissions
19 (SFFA) dated June 30, 2015. Do you recognize this
20 document?

21 A. Vaguely, yes.

22 Q. Have you seen it before?

23 A. Yes. I received it as an email.

24 Q. When?

25 A. I believe it was on June 30, 2015.

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REPORTER'S CERTIFICATE

STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

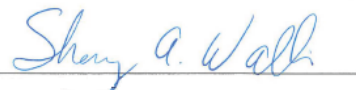
I, SHERRY A. WALLIN, Certified Realtime Reporter, Registered Merit Reporter and Notary Public ID 19874212873, State of Colorado, do hereby certify that previous to the commencement of the examination, the said [REDACTED] was duly sworn by me to testify to the truth in relation to the matters in controversy between the parties hereto; that the said deposition was taken in machine shorthand by me at the time and place aforesaid and was thereafter reduced to typewritten form; that the foregoing is a true transcript of the questions asked, testimony given, and proceedings had.

I further certify that I am not employed by, related to, nor of counsel for any of the parties herein, nor otherwise interested in the outcome of this litigation.

IN WITNESS WHEREOF, I have affixed my signature this 23rd day of June, 2017.

My commission expires May 14, 2019.

 X Reading and Signing was requested.
 Reading and Signing was waived.
 Reading and Signing is not required.



SHERRY A. WALLIN
Certified Realtime Reporter
Registered Merit Reporter