Students for Fair Admissions, Inc. v. President and Fellows of Harvard College et al

Doc. 419 Att. 24

EXHIBIT 24

Page 1 1 UNITED STATES DISTRICT COURT 2 FOR THE DISTRICT OF MASSACHUSETTS 3 -----X STUDENTS FOR FAIR ADMISSIONS, INC.,) 4) Plaintiff,) 5 Civ. No.) 14 - cv - 14176 -) vs. 6) (ADS) PRESIDENT AND FELLOWS OF HARVARD) 7 COLLEGE (HARVARD CORPORATION),)) Defendant. 8) ----X 9 10 July 27, 2017 11 1:00 p.m. 12 13 DEPOSITION OF , taken by 14 Defendant, held at the offices of Wilmer Cutler 15 Pickering Hale and Dorr LLP, 7 World Trade Center, 16 New York, New York, pursuant to Subpoena, before by 17 Mayleen Ahmed, a Registered Merit Reporter, 18 Certified Realtime Reporter, Washington Certified 19 Court Reporter, and Notary Public of the State of 20 New York. 21 22 23 24

1 leadership at SFFA. 2 MR. PARK: I'm going to instruct the 3 witness not to answer that with respect to the 4 governance issue, as before. 5 Okay. Did you personally vote to elect Ο. 6 any Board member of SFFA? 7 MR. PARKS: Objection. 8 Ο. Setting aside the structural question. 9 MR. PARKS: Objection. That's first 10 amendment privilege. Or instruction not to 11 answer, technically. 12 MR. WINIK: Okay. We disagree with the objection. We can move on. 13 14 Do you know who the treasurer of SFFA is? Ο. 15 MR. PARK: You can answer. 16 I don't know who the treasurer is. Α. 17 Ο. Do you know who the secretary of SFFA is? I don't know who that is either. 18 Α. 19 Do you know who the president of SFFA is? Q. 20 MR. PARKS: Objection. 21 Α. I think it's Mr. Edward Blum. 22 Ο. Have you ever spoken to Richard Fisher? 23 No, I don't think so. Α. 24 Did you ever communicate with him, by Q.

Page 41 1 email or otherwise? 2 Α. No. 3 Q. How about Abigail Fisher? 4 Α. No. 5 Do you know who's responsible for the Ο. 6 day-to-day operations of SFFA? 7 MR. PARKS: Objection. 8 Α. No. 9 Ο. You said earlier that you hadn't attended a conference call with SFFA. Have you ever 10 11 attended an in-person meeting? 12 Α. With who? 13 Ο. With other SFFA members. 14 Α. No. 15 Q. Do you know if SFFA has ever held an 16 in-person meeting with the members? 17 Α. I don't know if they have. 18 MR. WINIK: Could you mark that as 19 exhibit 3, please? 20 Exhibit 3, 6/30/15 letter re: 21 Annual report of Students for Fair Admissions, 22 SFFA-Harvard 0000119-122, marked for 23 identification, as of this date.) 24 Take a moment to look at that document. Q.

Page 65 1 Does that affect your answer about Q. 2 whether you would apply to transfer to Harvard if 3 Harvard were to cease the consideration of race in admissions? 4 5 MR. PARKS: Objection. And I'll also 6 just repeat my objection to the document, 7 although I note what you represent it to be. 8 You can answer. 9 Α. Could you repeat the question? 10 Q. I just read to you a document saying --11 Α. Uh-hmm. 12 Q. -- that to be eligible to transfer to 13 Harvard, a student cannot have completed more than 14 two years of college at another institution. 15 Α. Uh-hmm. 16 Q. You completed one year at ? 17 Α. Right. 18 Does this policy change the answer you Q. 19 gave me about whether you would apply to transfer 20 to Harvard if Harvard were to stop considering 21 race? 22 MR. PARKS: Objection. 23 If Harvard were to cease the Α. 24 consideration of race, I would still apply for

Page 66 1 transfer. 2 Ο. Are you planning to go to _____ next year? 3 Α. Yes. 4 Have you thought about taking a leave of Ο. 5 absence from ? 6 MR. PARKS: Objection. 7 Α. No. 8 So if two years from now Harvard ceases Ο. 9 the consideration of race, would you apply to 10 transfer to Harvard? 11 MR. PARKS: Objection. 12 (Witness reviewing document.) If I'm no longer eligible for transfer 13 Α. 14 admission, then I would not apply to transfer, I 15 quess. 16 Okay. Do you know what concentration you Q. 17 would pursue if you were to transfer to Harvard? 18 Sorry. 19 MR. PARKS: Objection. 20 I should say, concentration is what Q. 21 Harvard calls a major, if that makes it clear. 22 MR. PARKS: Objection. 23 If I were to be a student at Harvard, I Α. 24 think I would pursue a concentration of economics.

	Page 112
1	CERTIFICATE
2	
	STATE OF NEW YORK)
3) ss.
	COUNTY OF BRONX)
4	
5	I, MAYLEEN AHMED, a Registered Merit
6	Reporter, Certified Realtime Reporter,
7	Washington Certified Court Reporter and Notary
8	Public of the State of New York, do hereby
9	certify that the foregoing deposition of
10	was taken stenographically before me
11	on July 27, 2017 and transcribed by me.
12	That the witness was duly sworn by me,
13	and that such deposition is a true record of
14	the testimony given by such witness.
15	I further certify that I am not related
16	to any of the parties to this action by blood
17	or marriage, and that I am in no way interested
18	in the outcome of this matter.
19	IN WITNESS WHEREOF, I have hereunto set
20	my hand this 3rd day of August 2017.
21	
22	Mayleen almeet
23	
24	MAYLEEN AHMED, RMR, CRR, WA CCR No. 3402