

# EXHIBIT 96

**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

**DECLARATION OF RUTH SIMMONS, PH.D.**

I, Ruth Simmons, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I make this declaration at the request of counsel for Defendant President and Fellows of Harvard College (Harvard Corporation), and if called upon to testify as to the contents of this declaration would testify competently thereto.

2. Attached as Exhibit 34 to the Declaration of Felicia H. Ellsworth is a true and correct copy of my expert report signed December 15, 2017.

3. I have personal knowledge of the contents of the expert report attached as Exhibit 34.

4. I hereby verify that the contents of my expert report attached as Exhibit 34 are true and accurate.

5. Attached as Exhibit 28 to the Declaration of Felicia H. Ellsworth is a true and correct copy of my rebuttal expert report signed March 15, 2018.

6. I have personal knowledge of the contents of the rebuttal expert report attached as Exhibit 28.

7. I hereby verify that the contents of my rebuttal expert report attached as Exhibit 28 are true and accurate.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 15, 2018

/s/ Ruth Simmons  
Ruth Simmons