

# EXHIBIT 15

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

STUDENTS FOR FAIR ADMISSIONS,	)	
INC.,	)	
	)	
Plaintiff,	)	
	)	Civil Action No.
vs.	)	1:14-cv-14176-ADB
	)	
PRESIDENT AND FELLOWS OF	)	
HARVARD COLLEGE (HARVARD	)	
CORPORATION),	)	
	)	
Defendant.	)	
-----	)	

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

DEPOSITION OF CHRISTINA LOPEZ

New York, New York

Monday, May 22, 2017

Reported by: FRANCIS X. FREDERICK, CSR, RPR, RMR

Job No: 124550

1 C. LOPEZ

2 respective dean and director of admissions.

3 Q. So for member organizations is  
4 there typically a single institutional  
5 liaison?

6 A. Correct.

7 Q. Are admissions deans or directors  
8 of admission also members of ABAFAOILSS?

9 A. I'm a director of admission. I am  
10 a member.

11 Q. So are you not institutional  
12 liaison, then?

13 A. Correct.

14 Q. Does your college also have an  
15 institutional liaison?

16 A. Correct.

17 Q. Do you know if Harvard's dean or  
18 director of admissions is a member of  
19 ABAFAOILSS?

20 A. Not to my knowledge, no.

21 Q. In a case where a member's dean or  
22 director of admissions is not a member of  
23 ABAFAOILSS, the institutional liaison's role  
24 then is to be a contact between ABAFAOILSS and  
25 the dean or director of admissions, then,

1 C. LOPEZ

2 correct?

3 A. Yes.

4 Q. Do you see in the second paragraph  
5 it says: "The Ivy and Sister co-chairs will  
6 provide updates to the deans. The IL will  
7 receive a copy of the update in a separate  
8 e-mail communication prior to it being sent to  
9 the deans. It is the IL's responsibility to  
10 communicate with his or her dean and directors  
11 after meetings and after receiving copies of  
12 these updates."

13 Do you see that?

14 A. Yes.

15 Q. Did I read that correctly?

16 A. Yes.

17 Q. What does that mean?

18 A. After the meeting the co-chairs  
19 will typically send a breakdown of what  
20 happened in the meeting to update them on just  
21 the general topics of the meeting. The ILs  
22 will get this in a separate communication  
23 before it is sent to the deans.

24 Q. So it's the responsibility of the  
25 ILs to provide the information about what

1 C. LOPEZ

2 those meetings?

3 A. No.

4 Q. They cover the same types of  
5 topics and information?

6 A. For the most part, yes.

7 Q. Is there a separate group for  
8 deans and directors of admissions --

9 A. No.

10 Q. -- in ABAFAOILSS?

11 I'm sorry.

12 A. No.

13 Q. I want to ask a few questions  
14 about the Round Robin meetings. What are the  
15 Round Robin meetings?

16 A. Round Robin is a separate -- it is  
17 a part of our meetings where we share  
18 enrollment and application numbers.

19 Q. And what is the purpose of a Round  
20 Robin?

21 A. The purpose is to share best  
22 practices as well as recruitment information  
23 across institutions.

24 Q. And what types of numbers are  
25 shared at the Round Robin meetings?

1 C. LOPEZ

2 A. Applications and admits and  
3 enrolls.

4 Q. And --

5 A. For each institution. Broken out  
6 by race.

7 Q. And why is that information shared  
8 at Round Robin?

9 MS. MOONEY: Objection.

10 MR. SPONZILLI: I join the  
11 objection. You may answer.

12 A. To share best practices and  
13 recruitment strategies across institutions.

14 Q. Well, I guess I'm focusing on the  
15 numbers. It sounds different -- like a  
16 different piece of information than best  
17 practices; is it not?

18 MS. MOONEY: Objection.

19 MR. SPONZILLI: Objection.  
20 Argumentative. You may answer.

21 A. They are one in the same.

22 Q. How do numbers about a school's  
23 admissions, acceptances and enrollees inform  
24 an institution's best practices?

25 MS. MOONEY: Objection.

1 C. LOPEZ

2 Q. And then go across Asian, same  
3 thing?

4 A. Correct.

5 Q. And then through the totals at the  
6 end.

7 A. Correct.

8 Q. Okay. And was it just a listing  
9 of the numbers or is there commentary along  
10 the way?

11 A. At this point they list the  
12 number.

13 Q. And then when the first IL is  
14 done, does the next one -- I guess here from  
15 Brown, just do the same thing?

16 A. If they are present, yes.

17 Q. And you mentioned that  
18 institutional liaisons were not permitted to  
19 attend if they were not sharing these numbers;  
20 is that right?

21 A. Correct.

22 Q. Did that ever happen?

23 MS. MOONEY: Objection.

24 MR. SPONZILLI: Did what ever  
25 happen?

1 C. LOPEZ

2 Q. Okay. So going back to the format  
3 of the meeting, the institutional  
4 representatives from each of the schools would  
5 proceed in order to read out the numbers; is  
6 that right?

7 A. Yes.

8 Q. And that would go until I guess  
9 the end of the second page -- or third page,  
10 I'm sorry. Yale is the last one?

11 A. Yes.

12 Q. And so during that time it was  
13 just calling out numbers?

14 A. Yes.

15 Q. And during that process do people  
16 who are attending the meeting fill in the  
17 chart?

18 A. Yes.

19 Q. And are the numbers aggregate  
20 numbers or percentages?

21 A. They are aggregate numbers?

22 Q. Is there any -- well, let's get to  
23 the end. So how long did that process  
24 typically take then, just the reading of the  
25 numbers?



1 C. LOPEZ

2 MR. SPONZILLI: Objection. Asked  
3 and answered. You may answer it again.

4 Q. Just the reading of the numbers.

5 A. It depends on the number of ILs  
6 who are present. It can take about 30 minutes  
7 or so.

8 Q. So then if the meeting I think you  
9 said is about an hour, what happens in the  
10 second half of the meeting after the numbers  
11 are read out?

12 A. Any discussion.

13 Q. And who leads that discussion?

14 A. No one leads the discussion.

15 Q. How does the discussion proceed  
16 then?

17 A. Someone will ask a question that  
18 starts a discussion.

19 Q. So it's just free-flowing  
20 discussion.

21 A. Correct.

22 Q. And as a co-chair you didn't have  
23 any role in guiding the discussion or cutting  
24 it off or moderating?

25 A. No.

1 C. LOPEZ

2 Q. And how did the meeting conclude?

3 A. When the discussion ended, they  
4 left.

5 Q. Okay.

6 A. There's usually a time frame for  
7 Round Robin. When the allotted time frame is  
8 over, they leave to join the membership for  
9 the meeting.

10 Q. And what types of topics were  
11 covered in that discussion portion?

12 A. As I mentioned, recruitment  
13 strategy as well as group travel that schools  
14 have participated in. Any sort of best  
15 practices that correlated with their numbers.  
16 Questions that they may have had about any of  
17 the enrollment numbers.

18 Q. Okay. Would there be discussion  
19 if any of the numbers are unusual, too high or  
20 too low?

21 MS. MOONEY: Objection.

22 MR. SPONZILLI: Objection as to  
23 the form of the question. You may  
24 answer.

25 A. I can't ascertain if they would be

1 C. LOPEZ

2 that specific. But the recruitment numbers  
3 give context so if there was a question about  
4 a recruitment strategy, they would have  
5 numbers to correlate with that question.

6 Q. What do you mean by recruitment  
7 number?

8 A. Recruitment strategy.

9 Q. Okay. And what do you mean by  
10 recruitment strategy?

11 A. Meaning -- institutions have  
12 recruitment strategies. So which states are  
13 they going to, are they hitting certain  
14 community-based organizations. Are they doing  
15 group travel in certain areas that they didn't  
16 go before, et cetera. Are they finding  
17 different schools that are producing strong  
18 applicants.

19 Q. Okay. Do you know if it was ever  
20 discussed in the Round Robin meeting whether  
21 certain numbers were too high or too low?

22 A. No.

23 MS. MOONEY: Objection.

24 MR. SPONZILLI: Same objection.

25 Q. No, you don't know or no, that was

1 C. LOPEZ

2 not discussed?

3 A. No, I cannot recall.

4 Q. In the meeting that you attended  
5 or --

6 A. In the meeting that I attended.

7 Q. How would an attendee at this  
8 meeting know the significance of the numbers  
9 from other institutions? So, for example, if  
10 these are -- I think you said these are just  
11 absolute numbers and not percentages?

12 MR. SPONZILLI: I think she used  
13 the word "aggregate."

14 MR. PARK: Aggregate. I'm sorry.

15 MR. SPONZILLI: Which was in the  
16 form of your question you asked that.

17 MR. PARK: Okay.

18 Q. Is there any -- strike that whole  
19 thing. Let me start over.

20 Is there any context provided as  
21 part of the discussion about the significance  
22 of the numbers that are provided in this  
23 meeting?

24 MS. MOONEY: Objection.

25 MR. SPONZILLI: Join the

June 19, 2017

VIA E-MAIL [park@consovoymccarthy.com](mailto:park@consovoymccarthy.com) & U.S. MAIL

Michael Park, Esq.  
Consovoy McCarthy Park  
3 Columbus Circle  
New York, NY 10019

VIA E-MAIL [elizabeth.mooney@wilmerhale.com](mailto:elizabeth.mooney@wilmerhale.com) & U.S. MAIL

Elizabeth Mooney, Esq.  
Wilmerhale  
60 State Street  
Boston, MA 02109

**Re: Students for Fair Admissions, Inc. v. President and Fellows of Harvard  
College (Harvard Corporation)  
Docket No. 1:14-cv-14176**

Dear Counsel:

As you know, on May 22, 2017, Christina Lopez, a representative of ABAFAOILSS, appeared for deposition pursuant to Amended Subpoena to Testify at a Deposition in a Civil Action dated May 11, 2017. Upon receipt of a copy of her deposition transcript, Ms. Lopez and I reviewed the transcript to confirm the accuracy of her deposition. Please see below errors we have identified:

1. Page 7, Line 25: The record indicates that Ms. Mooney objected. That is incorrect. Ed Sponzilli objected.
2. Page 11, Line 12: The word "deposition" should be "documents."
3. Page 11, Line 23: The word "Pealy" should be "Pili."



June 19, 2017

Page 2

4. Page 11, Line 24: The word "Herrara" should be "Herrera."
5. Page 79, Line 22: "Q. Will, you said that the value of . . . "The highlighted word should have been, "Well."
6. The deposition should be treated for confidentiality purposes as indicated by Defendant Harvard University.

Please call me if you have any questions.

Very truly yours,

NORRIS McLAUGHLIN & MARCUS, P.A.



Edward G. Sponzilli

EGS:ykp

cc: Ms. Christina Lopez (via email)