

# EXHIBIT 254

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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 [REDACTED]

I, pursuant to 28 U.S.C. § 1746, declare the following:

1. I am an individual who is eighteen years old and of sound mind, who has never been convicted of a felony, is capable of making this declaration, and is fully competent to declare as to matters stated herein.

2. I am Asian-American and a citizen of the United States. Both of my parents are first-generation immigrants.

3. I attended [REDACTED] I graduated high school in [REDACTED]

4. In the fall of 2015, I applied for admission to Harvard College for the undergraduate class of 2020. In April 2016, I learned that Harvard College had denied my application for admission.

5. I plan to enroll at [REDACTED] in the fall.

6. I am able and ready to apply to transfer to Harvard were it to cease the use of race or ethnicity as an admissions preference and to cease its intentional discrimination against Asian Americans.

7. I became a member of Students for Fair Admissions ("SFFA") in April 2016 because I support its mission and believe that Harvard College and many other colleges and universities wrongly discriminate against Asian-American applicants for admission.

8. I paid the membership fee when I joined SFFA in April 2016.

9. I have agreed to participate in SFFA's lawsuit against Harvard and have received updates about the status of the case from Mr. Blum and from SFFA's attorneys. They have answered my questions and afforded me the opportunity to have input and direction on SFFA's case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, June 24, 2016.

