

EXHIBIT 259

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 over 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 reside in [REDACTED]. I am a first-generation Chinese immigrant, and I have two sons, [REDACTED].

3. [REDACTED] graduated from [REDACTED] in [REDACTED]. He applied for admission to Harvard College, which placed him on the wait list despite his outstanding qualifications. He plans to enroll at [REDACTED].

4. [REDACTED] is a [REDACTED] at [REDACTED] and plans to apply for admission to Harvard College.

5. I became a member of Students for Fair Admissions ("SFFA") in June 2016 because I support its work and believe that Harvard College and many other colleges and universities wrongly discriminate against Asian-American students.

6. I paid the membership fee when I joined SFFA in June 2016.

7. My son [REDACTED] is a standing member in SFFA's lawsuit against Harvard College, and we have been in contact about the case with Mr. Blum and SFFA's attorneys. I also communicate with [REDACTED] about the case.

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

Executed on this day, June 21, 2016.

