EXHIBIT 261

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

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PRESIDENT AND FELLOWS OF HARVARD COLLEGE (HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14cv-14176-ADB

DECLARATION OF

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.

I reside in I am a first-generation immigrant, and I have three children, and and and and and plans to

apply for admission to Harvard College.

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

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

6. 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

HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY

SFFA-Harvard 0001961

answered my questions and afforded me the opportunity to have input and direction on SFFA's

case. I also communicate with about the case.

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

Executed on this day, June 28, 2016.

