

EXHIBIT 285

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION

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STUDENTS FOR FAIR ADMISSIONS, *

INC., *

Plaintiff, *

v. * Civil Action

PRESIDENT AND FELLOWS OF HARVARD * No. 14-cv-14176

COLLEGE (HARVARD CORPORATION), * (ADB)

Defendant. *

* * * * *

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Rule 30(b)(6) Notice to Students for Fair
Admissions, Inc.

Videotaped Deposition of EDWARD J. BLUM

Tuesday, July 12, 2016

9:05 a.m.

Wilmer Cutler Pickering Hale and Dorr LLP

60 State Street - 26th Floor

Boston, Massachusetts 02109

----- J. Edward Varallo, RMR, CRR -----

Registered Professional Reporter

1 around the time that you became a member?

2 A. Yes.

3 Q. Which would have been summer of 2013?

4 A. Yes.

5 Q. So again that's before SFFA was
6 incorporated as an entity. Correct?

7 A. That's correct.

8 Q. Who maintained the member list in those
9 early days of the summer of 2013?

10 A. I did.

11 Q. And how did you maintain it? In what
12 form?

13 A. Spreadsheet.

14 Q. An Excel spreadsheet?

15 A. Yes.

16 Q. What was the initial purpose of SFFA?

17 A. Membership organization.

18 Q. A membership organization to do what?

19 A. Dedicated to ending race-based admissions
20 policies at American universities.

21 Q. And that original -- what did I call it?
22 -- initial purpose, is that maintained? Is that the
23 same purpose of the organization today, as you
24 understand it?

25 A. Yes.

1 A. Yes.

2 Q. And how do you know that? How would SFFA
3 determine that a member agreed with the mission?

4 A. Our mission statement was quite clear in
5 emails, discussions, and subsequently our mission
6 statement is very prominent on all of our
7 communications and our website.

8 Q. So that describes how people know what the
9 mission is. My question is, how do you know that
10 the members who became members under these bylaws
11 we're looking at in Exhibit 4 agreed with that
12 mission?

13 A. I assume they would not have joined had
14 they disagreed with that mission.

15 Q. But you don't know whether they joined
16 even if they disagreed with that mission?

17 A. It seemed unlikely to me that -- If they
18 joined, it seemed very likely that they agreed with
19 the mission.

20 Q. And why do you say that?

21 A. Well, we were a relatively small group of
22 people. We all knew one another. We had all
23 labored in this movement. It seems unlikely that
24 someone would call me and say "I want to be a
25 member" or agree to be a member but disagree with