## UNITED STATES DISTRICT COURT FOR THE DISTRICT COURT OF MASSACHUSETTS BOSTON DIVISION

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD COLLEGE (HARVARD CORPORATION),

Defendant,

and

SARAH COLE, FADHAL MOORE, ARJINI KUMARI NAWAL, ITZEL LIBERTAD VASQUEZ-RODRIGUEZ, KEYANNA WIGGLESWORTH, M.B., K.C., Y.D., G.E., A.G., I.G., R.H., J.L., AND R.S.,

> Proposed Defendant-Intervenors.

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

## MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Massachusetts Local Rule 83.5.3(b), Rahsaan D. Hall, Esq., a member in good standing of the Bar of the Commonwealth of Massachusetts and the United States

District Court for the District of Massachusetts, moves for the admission of Lawrence E.

Culleen, a member of the District of Columbia Bar, to this Court for the purpose of representing

Proposed Defendant Intervenors in the above-captioned matter, and states as follows:

1. Lawrence E. Culleen is a partner at Arnold & Porter LLP. His business address is

555 Twelfth Street, NW, Washington, D.C. 20004 and his telephone number is (202) 942-5477.

2. Lawrence E. Culleen is a member in good standing of the District of Columbia

Bar, as evidenced by the Certificate of Good Standing attached hereto as Exhibit A. There are no

disciplinary proceedings pending against him as a member of the bar in any jurisdiction. See

Affidavit of Lawrence E. Culleen, attached hereto as Exhibit B.

3. Lawrence E. Culleen is familiar with the applicable provisions of the Local Rules

of the United States District Court for the District of Massachusetts.

4. Rahsaan D. Hall, a member of the Bar of the Commonwealth of Massachusetts

and the United States District Court for the District of Massachusetts, will continue to represent

Proposed Defendant Intervenors if this motion is granted.

5. Pursuant to Local Rule 7.1(a), Proposed Defendant Intervenors have conferred

with counsel for the Plaintiff and Defendant and they have no objection to granting this motion.

WHEREFORE, the Defendant Intervenors respectfully request that Lawrence E. Culleen

be admitted to practice before this Court pro hac vice for the purpose of appearing as counsel for

Proposed Defendant Intervenors in the above referenced proceeding in accordance with the

Rules of this Court.

Respectfully submitted,

Dated: May 20, 2015

/s/ Rahsaan D. Hall

Rahsaan D. Hall, BBO # 645369

rhall@lawyerscom.org

LAWYERS' COMMITTEE FOR CIVIL RIGHTS

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Lawrence E. Culleen, D.C. Bar # 366854 Lawrence.Culleen@aporter.com ARNOLD & PORTER LLP 555 Twelfth Street, NW Washington, DC 20004-1206

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## **CERTIFICATE OF SERVICE**

In accordance with Local Rule 5.2(b), I, Rahsaan D. Hall, hereby certify that this document filed through the ECF system on May 20, 2015 will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Rahsaan D. Hall

Rahsaan D. Hall, Esq.