

**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.

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

**MOTION FOR ADMISSION OF BRENDA SHUM  
TO APPEAR *PRO HAC VICE***

Pursuant to Massachusetts Local Rule 83.5.3(b), Matthew Cregor, 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 Brenda Shum, a member of the Oregon Bar, to this Court for the purpose of representing Student *Amici Curiae*<sup>1</sup> in the above-captioned matter, and states as follows:

1. Brenda Shum is Director of the Educational Opportunities Project at the Lawyers'

Committee For Civil Rights Under Law. Her business address is 1500 K Street NW, Suite 900, Washington D.C., 20005 and her telephone number is (202) 662-8332.

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<sup>1</sup> Student *Amici Curiae* are a group of current and prospective students of Harvard whom the Court granted leave to participate in this action as *amici*. Order at 23, June 15, 2015, ECF No. 52.

2. Brenda Shum is an active member of the Oregon Bar with no record of discipline. There are no disciplinary proceedings pending against her as a member of the bar in any jurisdiction. See declaration of Brenda Shum, attached hereto as Exhibit A.

3. Brenda Shum is familiar with the applicable provisions of the Local Rules of the United States District of Massachusetts.

4. Matthew Cregor, 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 Student *Amici Curiae* if this motion is granted.

5. Pursuant to Local Rule 7.1(a), Student *Amici Curiae* have conferred with counsel for the Plaintiff and Defendant and they have no objection to granting this motion.

WHEREFORE, the Student *Amici Curiae* respectfully request that Brenda Shum be admitted to practice before this Court *pro hac vice* for the purpose of appearing as counsel for Student *Amici Curiae* in the above referenced proceeding in accordance with the Rules of this Court.

Dated: August 6, 2018

Respectfully submitted,

/s/ Matthew Cregor  
Matthew Cregor, Esq., BBO # 673785  
LAWYERS' COMMITTEE FOR CIVIL RIGHTS  
AND ECONOMIC JUSTICE  
61 Batterymarch Street, 5<sup>th</sup> Floor  
Boston, MA 02110  
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ATTORNEY FOR *AMICI CURIAE*

**CERTIFICATE OF CONFERENCE**

In accordance with Local Rule 5.2(b) I hereby certify that this document filed through the ECF system on August 6, 2018 will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Matthew Cregor  
Matthew Cregor