

**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 GENEVIEVE BONADIES TORRES
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 Genevieve Bonadies Torres, a member of the California Bar, to this Court for the purpose of representing Student *Amici Curiae*¹ in the above-captioned matter, and states as follows:

1. Genevieve Bonadies Torres is Counsel with the Educational Opportunities Project at the Lawyers' Committee For Civil Rights Under Law. Her business address is 1401 New York Ave., NW, Suite 400, Washington D.C., 20005 and her telephone number is (202) 662-8326.

2. Genevieve Bonadies Torres is an active member of the California Bar with no record of discipline as evidenced by the Certificate of Standing attached hereto as Exhibit A. There are no

¹ 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.

disciplinary proceedings pending against her as a member of the bar in any jurisdiction. See declaration of Genevieve Bonadies Torres, attached hereto as Exhibit B.

3. Genevieve Bonadies Torres 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 Genevieve Bonadies Torres 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
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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