

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT 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-ADB

**MOTION FOR LEAVE TO SUBMIT REPLY ON BEHALF OF
HARVARD-RADCLIFFE BLACK STUDENTS ASSOCIATION,
KUUMBA SINGERS OF HARVARD COLLEGE,
FUERZA LATINA OF HARVARD,
NATIVE AMERICANS AT HARVARD COLLEGE,
HARVARD-RADCLIFFE ASIAN AMERICAN ASSOCIATION,
HARVARD-RADCLIFFE ASIAN AMERICAN WOMEN’S ASSOCIATION,
HARVARD ASIAN AMERICAN BROTHERHOOD,
HARVARD VIETNAMESE ASSOCIATION,
HARVARD-RADCLIFFE CHINESE STUDENTS ASSOCIATION,
HARVARD KOREAN ASSOCIATION,
HARVARD JAPAN SOCIETY,
HARVARD SOUTH ASIAN ASSOCIATION,
HARVARD ISLAMIC SOCIETY,
TASK FORCE ON ASIAN AND PACIFIC AMERICAN
STUDIES AT HARVARD COLLEGE,
HARVARD PHILLIPS BROOKS HOUSE ASSOCIATION,
HARVARD MINORITY ASSOCIATION OF PRE-MEDICAL STUDENTS,
COALITION FOR A DIVERSE HARVARD,
FIRST GENERATION HARVARD ALUMNI,
NATIVE AMERICAN ALUMNI OF HARVARD UNIVERSITY,
HARVARD UNIVERSITY MUSLIM ALUMNI, AND
HARVARD LATINO ALUMNI ALLIANCE**

Amici Curiae Harvard-Radcliffe Black Students Association, Kuumba Singers of Harvard College, Fuerza Latina of Harvard, Native Americans at Harvard College, Harvard-Radcliffe Asian American Association, Harvard-Radcliffe Asian American Women’s Association, Harvard Asian American Brotherhood, Harvard Vietnamese Association, Harvard-Radcliffe Chinese Students Association, Harvard Korean Association, Harvard Japan Society, Harvard South Asian Association, Harvard Islamic Society, Task Force on Asian and Pacific American Studies at Harvard College, Harvard Phillips Brooks House Association, Harvard Minority Association of Pre-Medical Students, Coalition for a Diverse Harvard, First Generation Harvard Alumni, Native American Alumni of Harvard University, Harvard University Muslim Alumni, and Harvard Latino Alumni Alliance (collectively “Amici Organizations”) request leave pursuant to local rule 7.1(b)(3) to file a Reply to Plaintiff’s Memorandum in Opposition to Amici Organization’s Motion for Leave to File to Participate as Amici Curiae, attached hereto as Exhibit 1.

Amici Organizations seek to respond to arguments that Plaintiff Students for Fair Admissions (“SFFA”) submitted in opposition to Amici Organizations’ Motion, after this court had already granted Amici Organizations’ Motion to Participate as Amici and submit declarations. ECF No. 455. SFFA erroneously asks the Court to strike the declarations that Amici Organizations filed on behalf of a diverse coalition of Harvard student and alumni organizations, which represent thousands of Harvard students and alumni who are directly impacted by the race-conscious admissions policy at issue in this case. *See* ECF No. 479. Doing so would exclude key arguments made in Amici Organization’s amicus brief and would deprive this Court of important information in its adjudication of Defendant’s motion for summary judgment. *See* ECF No. 479-1 (proposing to strike the concerns voiced by Harvard student declarants on pages 4, 5, 16-20, 23-24, 26-28 of ECF No. 455).

WHEREFORE, the Proposed Amici Organizations respectfully request that the Court grant them leave to file a reply.

Dated: August 16, 2018

Respectfully submitted,

/s/ Rachel Kleinman

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Association, Harvard-Radcliffe Asian American Women's Association, Harvard Asian American Brotherhood, Harvard Vietnamese Association, Harvard-Radcliffe Chinese Students Association, Harvard Japan Society, Harvard South Asian Association, Harvard Islamic Society, Task Force on Asian and Pacific American Studies at Harvard College, Harvard Phillips Brooks House Association, Harvard Minority Association of Pre-Medical Students, Coalition for a Diverse Harvard, First Generation Harvard Alumni, Native American Alumni of Harvard University, Harvard University Muslim Alumni, and Harvard Latino Alumni Alliance

**Admitted Pro Hac Vice*

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

I hereby certify that counsel for the above-listed Amici Curiae conferred with counsel for the Defendant, President and Fellows of Harvard College (Harvard Corporation), on August 15, 2018, and with counsel for the Plaintiff, Students for Fair Admissions, Inc., on August 15, 2018. The Defendant and Plaintiff assent to Amici Organizations filing a reply.

/s/ Rachel Kleinman
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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of August, 2018, a copy of the above and foregoing MOTION FOR LEAVE TO SUBMIT REPLY was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the court's electronic filing system.

/s/ Rachel Kleinman
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