

**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); and THE  
HONORABLE AND REVEREND THE BOARD OF  
OVERSEERS,

Defendants.

Civil Action No. 1:14-cv-14176

**MOTION FOR LEAVE TO APPEAR *PRO HAC VICE***

Pursuant to Rule 83.5.3(b) of the Local Rules of United States District Court for the District of Massachusetts, Plaintiff, Students for Fair Admissions, Inc., by its attorneys, Paul M. Sanford and Benjamin C. Caldwell, move this Court to admit attorneys William S. Consovoy, Thomas R. McCarthy and John Michael Connolly of Consovoy McCarthy PLLC, 3033 Wilson Boulevard, Suite 700, Arlington, Virginia 22201, to appear, defend, and practice *pro hac vice* as co-counsel on behalf of Students for Fair Admissions, Inc.

1. Attorney William S. Consovoy is a partner in the law firm of Consovoy McCarthy PLLC. He is a member in good standing of the Virginia State Bar, the Virginia Supreme Court, the District of Columbia Bar, the United States District Court for the District of Columbia, the United States Courts of Appeals for the First, Third, Fourth, Fifth, Sixth, Eleventh, D.C. and Federal Circuits, and the United States Supreme Court. There are no disciplinary proceedings pending against Mr. Consovoy in any jurisdiction.

2. Attorney Thomas R. McCarthy is a partner in the law firm of Consovoy McCarthy PLLC. He is a member in good standing of the Virginia State Bar, the Virginia Supreme Court, the District of Columbia Bar, the United States District Courts for the Eastern District of Virginia and the District of Columbia, the United States Courts of Appeals for the Second, Fifth, Ninth, Tenth and D.C. Circuits, and the United States Supreme Court. There are no disciplinary proceedings pending against Mr. McCarthy in any jurisdiction.

3. Attorney John Michael Connolly is counsel in the law firm of Consovoy McCarthy PLLC. He is a member in good standing of the Virginia State Bar, the Virginia Supreme Court, the District of Columbia Bar, the United States District Courts for the Eastern District of Virginia and the District of Columbia, the United States Courts of Appeals for the Second, Fourth, Sixth, Seventh, Ninth, Tenth, and D.C. Circuits, and the United States Supreme Court. There are no disciplinary proceedings pending against Mr. Connolly in any jurisdiction.

4. Mr. Consovoy, Mr. McCarthy and Mr. Connolly are each familiar with the issues in this case and with the Local Rules of this Court.

5. Mr. Sanford and Mr. Caldwell are members in good standing of the Bar of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts and will continue to represent Students for Fair Admissions, Inc. if this motion is granted.

6. In support of this Motion, Students for Fair Admissions, Inc. relies upon the Certifications of Mr. Consovoy, Mr. McCarthy and Mr. Connolly filed herewith.

**WHEREFORE**, Students for Fair Admissions, Inc. respectfully requests that this Court admit attorneys William S. Consovoy, Thomas R. McCarthy and John Michael Connolly to

appear, defend, and practice *pro hac vice* as co-counsel on behalf of Students for Fair Admissions, Inc.

Dated: November 17, 2014

Respectfully submitted,

/s/ Paul M. Sanford  
/s/ Benjamin C. Caldwell  
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*Attorneys for Plaintiff  
Students for Fair Admissions, Inc.*

### **CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be served upon Defendants along with a copy of the Complaint which was filed contemporaneously herewith.

/s/ Paul M. Sanford  
Paul M. Sanford