

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

**CONSENTED-TO MOTION TO SEAL CERTAIN INFORMATION FILED IN
CONNECTION WITH PRE-TRIAL MOTIONS**

Pursuant to Local Rule 7.2 and the Stipulated Protective Order (Dkt. 55), Plaintiff Students for Fair Admissions, Inc. (“SFFA”) hereby moves this Court for an order sealing (1) limited portions of pre-trial motions that will be filed on September 17 and (2) parts of certain exhibits filed in support of those motions. The materials that the parties seek to seal include information designated by both SFFA and Harvard as Confidential or Highly Confidential–Attorneys’ Eyes Only pursuant to the Stipulated Protective Order (Dkt. 55), and for which the Court has yet to rule on the parties’ dispute over the scope of information that can be permissibly withheld from the public. See Dkt. 410, 427. Harvard has consented to this motion.

SFFA requests that the documents subject to this Motion be impounded until further order of the Court. In the event the Court has not previously ordered otherwise, the parties’ submissions should be returned to their undersigned counsel upon resolution of this matter.

WHEREFORE, SFFA respectfully requests that the Court grant this motion and allow portions of its pre-trial motions and parts of its supporting exhibits to be filed under seal on or before September 17 and to be viewed only by the Judge, her clerk(s), and Court personnel.

Respectfully submitted,

/s/ Patrick Strawbridge
Patrick Strawbridge BBO #678274
CONSOVOY MCCARTHY PARK PLLC
Ten Post Office Square
8th Floor South PMB #706
Boston, MA 02109
Tel: 617-227-0548
patrick@consovoymccarthy.com

William S. Consovoy
Thomas R. McCarthy
Michael H. Park
J. Michael Connolly
CONSOVOY MCCARTHY PARK PLLC
3033 Wilson Boulevard, Suite 700
Arlington, Virginia 22201
Tel: 703-243-4923
Fax: 703.243.4923
will@consovoymccarthy.com
tom@consovoymccarthy.com
park@consovoymccarthy.com
mike@consovoymccarthy.com

Adam K. Mortara
J. Scott McBride
Krista J. Perry
Bartlit Beck Herman Palenchar & Scott LLP
54 West Hubbard Street, Suite 300
Chicago, IL 60654
312.494.4400
adam.mortara@bartlit-beck.com
scott.mcbride@bartlit-beck.com
krista.perry@bartlit-beck.com

John M. Hughes
Katherine L.I. Hacker
Meg E. Fasulo
Bartlit Beck Herman Palenchar & Scott LLP
1801 Wewatta Street, Suite 1200
Denver, CO 80202

303.592.3100
john.hughes@bartlit-beck.com
kat.hacker@bartlit-beck.com
meg.fasulo@bartlit-beck.com

Paul M. Sanford BBO #566318
BURNS & LEVINSON LLP
125 Summer
One Citizens Plaza, Suite 1100
Providence, RI 02903
Tel: 617-345-3000
Fax: 617-345-3299
psanford@burnslev.com

Counsel for Plaintiff Students for Fair Admissions,
Inc.

Dated: September 14, 2018

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to all counsel of record via the CM/ECF system.

/s/ Patrick Strawbridge
Patrick Strawbridge