## Exhibit 15

1	UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS
2	BOSTON DIVISION
3	
	<b>x</b>
4	STUDENTS FOR FAIR ADMISSIONS,
5	INC.,
6	Plaintiff,
7	Civil Action No. vs. 1:14-cv-14176
8	PRESIDENT AND FELLOWS OF HARVARD COLLEGE (HARVARD CORPORATION);
9	and THE HONORABLE AND REVEREND THE BOARD OF OVERSEERS,
10	
11	Defendants.
12	x
13	- HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY -
14	DEPOSITION OF CATHERINE DREW
15	GILPIN FAUST, a witness called by the
16	Plaintiff, taken pursuant to the
17	applicable provisions of the Federal
18	Rules of Civil Procedure, before James A.
19	Scally, RMR, CRR, a Notary Public in and
20	for the Commonwealth of Massachusetts, at
21	Harvard University, Massachusetts Hall,
22	Cambridge, Massachusetts, on Friday,
23	March 10, 2017, commencing at 8:52 a.m.
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1	dispositive factor in admissions?
2	A. It prevents any single characteristic from
3	being dispositive.
4	Q. Do you know
5	A. They are all seen in a broad context.
6	Q. Do you know how do you know that what
7	do you know about the origin of Harvard's holistic
8	admissions process?
9	A. I know it's been around for a long time.
10	Q. Are you familiar with the work of Jerome
11	Karabel?
12	A. Yes.
13	Q. Are you familiar with his book The Chosen?
14	A. I am. I have not read it. I know of it.
15	Q. Are you are you generally aware that the
16	holistic admissions process was used for a time in
17	the 20th century to discriminate against Jewish
18	applicants?
19	MS. ELLSWORTH: Objection. I
20	object to the entire line of
21	questioning.
22	MR. STRAWBRIDGE: The objection's
23	noted.
24	Q. Do you know whether that's true?

I'm a historian. I would not rely on the 1 2 interpretation of a single historian unchallenged. have not done that historical work myself, and 3 4 therefore I would not presume to make judgment about its accuracy. 5 Do you know whether Harvard has ever 6 7 acknowledged that its holistic admissions process was used to discriminate against Jewish applicants in the 8 9 early 20th century? 10 MS. ELLSWORTH: Objection. I do not know. 11 Okay. Do you know whether prior Harvard 12 Ο. 13 presidents have acknowledged that the use of a 14 holistic admissions process was inappropriate with respect to Jewish applicants during the 20th century? 15 MS. ELLSWORTH: Objection. 16 17 Α. I do not know. 18 Do you agree that it would be inappropriate 19 to use a holistic admissions process to discriminate 20 against Jewish applicants, for example? 21 MS. ELLSWORTH: Objection. 22 I believe that the holistic admissions process is one that, by looking at the whole student 23 24 and the variety of dimensions that make up a class,

is the best way to give full consideration to students of all backgrounds.

Q. Is it possible that a holistic admissions process could be abused?

MS. ELLSWORTH: Objection.

- A. You're asking me to comment on abstractions and hypothetical situations. I don't live in the world of hypotheticals. I live in the world of what has happened, what is happening.
- Q. Well, but you don't know what happened with respect to the holistic admissions process of Jewish applicants in the 20th century?

MS. ELLSWORTH: Objection.

- A. I would argue that the entire context in the 1920s is so different from our own time, it would be very -- you'd have to be very careful in making direct comparisons between how admissions worked and how Harvard worked and drawing a line of analogy between those two times. I'd want to dig in -- if I were to make such an argument, I would want to dig deeply into the entire history and operation. I don't believe that has been done. And so I don't want to draw conclusions from it.
  - Q. To your knowledge, Harvard has never dug into

the history of how Jewish applicants were treated in 1 2 the 20th century? Not to my knowledge. 3 4 MS. ELLSWORTH: Objection. I'm sorry. Can you just repeat your answer? 5 Q. Not to my knowledge. I would say not to my 6 Α. 7 knowledge with the kind of depth and rigor that I would want to see. 8 Do you think Harvard should look into that? 10 MS. ELLSWORTH: Objection. 11 I'd be perfectly happy to have Harvard look into it. 12 13 Has anyone ever asked Harvard to look into 14 that in your time as president? 15 I have -- they have not asked me, to my Α. recollection. 16 17 Do you think it's important for Harvard to 18 understand its history and how it treated certain 19 groups? I do think --20 Α. 21 MS. ELLSWORTH: Objection. 22 I do think it's important for Harvard to 23 understand its history.

Is that a commitment that should come from

24

Q.

1	COMMONWEALTH OF MASSACHUSETTS SUFFOLK, SS.
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3	I, JAMES A. SCALLY, RMR, CRR, a
4	Certified Shorthand Reporter and Notary Public duly commissioned and qualified in and for the Commonwealth of Massachusetts, do hereby certify that
5	there came before me on the 10th day of March, 2017, at 8:52 a.m., the person hereinbefore named,
6	CATHERINE DREW GILPIN FAUST, who provided satisfactory evidence of identification as prescribed
7	by Executive Order 455 (03-13) issued by the Governor of the Commonwealth of Massachusetts, was by me duly
8	sworn to testify to the truth and nothing but the truth of her knowledge concerning the matters in
9	controversy in this cause; that she was thereupon examined upon her oath, and her examination reduced
10	to typewriting under my direction; and that this is a true record of the testimony given by the witness to
11	the best of my ability.  I further certify that I am neither
12	attorney or counsel for, nor related to or employed by, any of the parties to the action in which this
13	deposition is taken, and further, that I am not a relative or employee of any attorney or counsel
14	employed by the parties hereto or financially interested in the action.
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16	My Commission Expires: April 8, 2022
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20	James A. Scally, RMR, CRR CSR/Notary Public
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