

Exhibit 15

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION

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STUDENTS FOR FAIR ADMISSIONS,
INC.,

Plaintiff,

vs.

Civil Action No.
1:14-cv-14176

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE (HARVARD CORPORATION);
and THE HONORABLE AND REVEREND
THE BOARD OF OVERSEERS,

Defendants.

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- HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY -

DEPOSITION OF CATHERINE DREW
GILPIN FAUST, a witness called by the
Plaintiff, taken pursuant to the
applicable provisions of the Federal
Rules of Civil Procedure, before James A.
Sally, RMR, CRR, a Notary Public in and
for the Commonwealth of Massachusetts, at
Harvard University, Massachusetts Hall,
Cambridge, Massachusetts, on Friday,
March 10, 2017, commencing at 8:52 a.m.

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?

1 A. I'm a historian. I would not rely on the
2 interpretation of a single historian unchallenged. I
3 have not done that historical work myself, and
4 therefore I would not presume to make judgment about
5 its accuracy.

6 Q. Do you know whether Harvard has ever
7 acknowledged that its holistic admissions process was
8 used to discriminate against Jewish applicants in the
9 early 20th century?

10 MS. ELLSWORTH: Objection.

11 A. I do not know.

12 Q. Okay. Do you know whether prior Harvard
13 presidents have acknowledged that the use of a
14 holistic admissions process was inappropriate with
15 respect to Jewish applicants during the 20th century?

16 MS. ELLSWORTH: Objection.

17 A. I do not know.

18 Q. 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 A. I believe that the holistic admissions
23 process is one that, by looking at the whole student
24 and the variety of dimensions that make up a class,

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

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

5 MS. ELLSWORTH: Objection.

6 A. You're asking me to comment on abstractions
7 and hypothetical situations. I don't live in the
8 world of hypotheticals. I live in the world of what
9 has happened, what is happening.

10 Q. Well, but you don't know what happened with
11 respect to the holistic admissions process of Jewish
12 applicants in the 20th century?

13 MS. ELLSWORTH: Objection.

14 A. I would argue that the entire context in the
15 1920s is so different from our own time, it would be
16 very -- you'd have to be very careful in making
17 direct comparisons between how admissions worked and
18 how Harvard worked and drawing a line of analogy
19 between those two times. I'd want to dig in -- if I
20 were to make such an argument, I would want to dig
21 deeply into the entire history and operation. I
22 don't believe that has been done. And so I don't
23 want to draw conclusions from it.

24 Q. To your knowledge, Harvard has never dug into

1 the history of how Jewish applicants were treated in
2 the 20th century?

3 A. Not to my knowledge.

4 MS. ELLSWORTH: Objection.

5 Q. I'm sorry. Can you just repeat your answer?

6 A. Not to my knowledge. I would say not to my
7 knowledge with the kind of depth and rigor that I
8 would want to see.

9 Q. Do you think Harvard should look into that?

10 MS. ELLSWORTH: Objection.

11 A. I'd be perfectly happy to have Harvard look
12 into it.

13 Q. Has anyone ever asked Harvard to look into
14 that in your time as president?

15 A. I have -- they have not asked me, to my
16 recollection.

17 Q. Do you think it's important for Harvard to
18 understand its history and how it treated certain
19 groups?

20 A. I do think --

21 MS. ELLSWORTH: Objection.

22 A. I do think it's important for Harvard to
23 understand its history.

24 Q. Is that a commitment that should come from

