

# Exhibit A2

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC.,  
Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE,  
Defendant.

Civ. Act. No. 1:14-cv-14176-ADB

**HARVARD'S OBJECTIONS TO SFFA'S WITNESS LIST**

Defendant President and Fellows of Harvard College ("Harvard") hereby submits the following objections to Students for Fair Admissions, Inc.'s ("SFFA") witness list. Harvard reserves the right to supplement these objections.

<b>Name</b>	<b>Contact Information</b>	<b>Will Call/ May Call</b>	<b>Harvard's Objections</b>
Charlene Kim	Contact through counsel	May Call	SFFA did not timely disclose Ms. Kim as a witness. SFFA did not add Ms. Kim to its witness list until September 19, 2018, nearly two weeks after the September 7, 2018 deadline by which to disclose witnesses.
Christina Lopez	111 Milbank Hall 3009 Broadway New York, NY 10027 212-854-2014	May Call (by deposition)	Ms. Lopez's testimony is not relevant under FRE 401.
Casey Pedrick	345 Chambers St New York, NY 10282 212-312-4800	May Call (by deposition)	Ms. Pedrick's testimony is not relevant under FRE 401.

<b>Name</b>	<b>Contact Information</b>	<b>Will Call/ May Call</b>	<b>Harvard's Objections</b>
Ruth Simmons	P.O. Box 519; MS 1001 Alvin I. Thomas Bldg., Suite 202 Prairie View, TX 77446 936-261-2111	Will Call	As Harvard's expert witness, Dr. Simmons cannot be called in SFFA's case-in-chief. SFFA may cross-examine Dr. Simmons after she has offered testimony on direct examination by Harvard. Additionally, SFFA did not timely disclose President Simmons as a live witness. On September 7, 2018, the date on which the parties exchanged witness lists, SFFA indicated that it might call President Simmons by deposition. SFFA did not indicate that it will call President Simmons as a live witness until September 11, 2018.
Fabio Zuluaga	8115 Gatehouse Rd Falls Church, VA 22042 571-423-1120	May Call (by deposition)	Mr. Zuluaga's testimony is not relevant under FRE 401.