

# Exhibit B

**HARVARD’S LIST OF WITNESSES TO BE CALLED LIVE OR BY DEPOSITION**

Defendant President and Fellows of Harvard College (“Harvard”) provides the following witness list identifying those witnesses it expects it will call, or may call, at trial.

<b>Witnesses Harvard Will Call in Person</b>	<b>Witnesses Harvard May Call In Person</b>	<b>Witnesses Harvard May Call By Deposition (Video Or Transcript) Only</b>
1. David Card	1. Roger Banks	1. Grace Cheng
2. Erin Driver-Linn	2. Sally Clark Donahue	2. Kaitlin Howrigan
3. Drew Faust	3. Mark Hansen	3. Brock Walsh
4. William Fitzsimmons	4. Charlene Kim	4. Caroline Weaver
5. Rakesh Khurana	5. Marlyn McGrath	
6. Ruth Simmons	6. Tia Ray	
7. Michael Smith		

To the extent that a witness’ circumstances change, or a witness becomes unavailable for trial, Harvard reserves the right to call that witness by deposition or to call a substitute witness. Harvard further reserves the right to call: 1) additional witnesses to provide foundation testimony should any party contest the authenticity or admissibility of any material proffered at trial; 2) additional witnesses to respond to issues raised by the Court’s pretrial or trial rulings or to issues raised after the submission of this witness list; and 3) any witness listed on Students for Fair Admissions, Inc.’s (“SFFA”) witness list or required to rebut SFFA’s case. To the extent the Court determines that any witness listed in the Motion of *Student Amici Curiae* to Participate in Trial (Dkt. 518) will be permitted to testify, Harvard further reserves the right to question that witness.