

EXHIBIT 10

In The Matter Of:
*Students for Fair Admissions, Inc. v.
President and Fellows of Harvard College, et al.*

*Rakesh Khurana
April 27, 2017
Highly Confidential - For Attorneys' Eyes Only*

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Original File Rakesh Khurana 4-27-17.txt
Min-U-Script® with Word Index

1 Institutional Research about whether Harvard's
2 admissions process affects or disadvantages Asians.
3 Do you recall ever seeing this document?

4 A. I may have seen some of these tables, but I
5 can't say for certain that I saw this document.

6 Q. What do you recall about seeing some of these
7 tables?

8 A. That there was an examination of looking at
9 the admittance of students.

10 Q. And which tables in particular do you think
11 you've seen before?

12 A. I can't tell you specifically.

13 Q. Okay. And what do you remember about this
14 examination?

15 MS. ELLSWORTH: Objection.

16 A. Just that I didn't think that this was --
17 analysis was done appropriately.

18 Q. And why didn't you think that?

19 A. There's limitations, a lot of limitations to
20 doing what are called fitted models like this.

21 Q. Okay. Let's back up a little bit. When do
22 you specifically remember seeing some of these
23 tables?

24 MS. ELLSWORTH: Objection.

1 Q. Do you recall whether you ever discussed them
2 with Dean Hammonds?

3 A. I don't believe I discussed this with Dean
4 Hammonds.

5 Q. And you can't remember discussing it with
6 anybody?

7 A. I don't remember discussing these with
8 anybody.

9 Q. When you say there are a lot of problems with
10 a fit model such as these, what specific problems, if
11 any, do you recall thinking about when you looked at
12 tables like the ones in this report?

13 A. That models like this violate statistical and
14 hypothesis testing.

15 Q. Did you discuss any of that with people at
16 the Office of Institutional Research?

17 A. No.

18 Q. Do you think that the people at the Office of
19 Institutional Research understand statistical
20 modelling?

21 MS. ELLSWORTH: Objection.

22 A. I don't know.

23 Q. Do you assume that the people who do the
24 institutional research for the college and for the

1 PLEASE ATTACH TO THE DEPOSITION OF RAKESH KHURANA
 2 CASE: STUDENTS FOR FAIR ADMISSIONS, INC. VS.
 3 PRESIDENT AND FELLOWS OF HARVARD COLLEGE, ET AL
 4 DATE TAKEN: APRIL 27, 2017

5 ERRATA SHEET

6 Please refer to Page 265 for Errata Sheet
 7 instructions and distribution instructions.

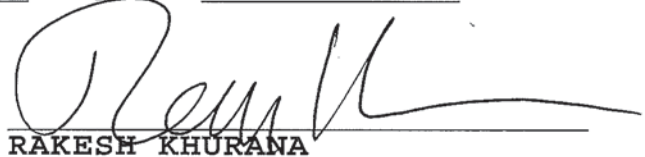
8 PAGE LINE CHANGE REASON

9 Please see attached errata sheet.

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16 I have read the foregoing transcript of my
 17 deposition, and except for any corrections or changes
 18 noted above, I hereby subscribe to the transcript as
 19 an accurate record of the statements made by me.

20
 21 Executed this _____ day of _____, 2017.

22 
 23 RAKESH KHURANA
 24