

# EXHIBIT 6

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF MASSACHUSETTS

3 \_\_\_\_\_  
4 STUDENTS FOR FAIR ADMISSIONS, INC.,  
5 Plaintiff,

6 v. No. 1:14-cv-14176

7 PRESIDENT AND FELLOWS OF  
8 HARVARD COLLEGE  
9 (HARVARD CORPORATION),  
10 Defendant.

11 \_\_\_\_\_

12  
13 VOLUME II

14 HIGHLY CONFIDENTIAL- ATTORNEYS' EYES ONLY

15  
16 DEPOSITION of MARLYN McGRATH

17 Boston, Massachusetts

18 August 1, 2017  
19  
20  
21

22 Reported by:

23 Dana Welch, CSR, RPR, CRR, CRC

24 Job #127107  
25

1 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY - McGRATH

2 MS. ELLSWORTH: Objection.

3 A. No, I don't know that.

4 Q. You don't know one way or the other?

5 A. No.

6 Q. Same with personal. In your experience,  
7 do Asian Americans as a group lack attractive  
8 personal characteristics compared to other  
9 applicants?

10 MS. ELLSWORTH: Objection.

11 A. No, I don't think so.

12 Q. Can you think of any reason why somebody's  
13 race would affect their personal rating?

14 MS. ELLSWORTH: Objection.

15 A. No, not in our system.

16 Q. The personal ratings -- if I recall  
17 correctly from your prior testimony, the personal  
18 rating is intended to just kind of be an analysis  
19 as how likeable is this person, does this person  
20 seem like a good person to be around?

21 MS. ELLSWORTH: Objection.

22 A. That's part of it.

23 Q. What else is included?

24 A. Depends on the case. And the source for  
25 that judgment, which I'll get to, is from several

1       HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY - McGRATH  
2 sources. But I would say that it includes perhaps  
3 likability, also character traits, such as  
4 integrity, helpfulness, courage, kindness,  
5 characteristics of personality and character that  
6 may be demonstrated over a student's -- to others  
7 during a student's experience in the college and  
8 during the student's experience with the admissions  
9 process.

10       Q. And none of those characteristics, in your  
11 view, have any correlation with race, correct?

12       MS. ELLSWORTH: Objection.

13       A. Correct.

14       Q. The fourth model here lists the projected  
15 admitted student pool once the demographics are  
16 added in, which according to the prior slide was  
17 race and gender, correct?

18       MS. ELLSWORTH: Objection.

19       A. Yes.

20       Q. And that says that when you add in  
21 demographics, the Asian share of the class goes  
22 down to slightly under 18 percent, 17.97; is that  
23 correct?

24       MS. ELLSWORTH: Objection.

25       A. That's according to these data, yes,

CERTIFICATE

Commonwealth of Massachusetts  
Suffolk, ss.

I, Dana Welch, Registered Professional Reporter, Certified Realtime Reporter and Notary Public in and for the Commonwealth of Massachusetts, do hereby certify that MARLYN McGRATH, the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record of the testimony given by the witness.

I further certify that I am neither related to nor employed by any of the parties in or counsel to this action, nor am I financially interested in the outcome of this action.

In witness whereof, I have hereunto set my hand and seal this 11th day of August, 2017.

\_\_\_\_\_  
Dana Welch

Notary Public

My commission expires:

October 6, 2017