

EXHIBIT 9

Erica J. Bever

Volume I

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Exhibits 1 to 23

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

- - - - -x
STUDENTS FOR FAIR ADMISSIONS, :
INC., :
Plaintiff, :
vs. : Civil Action
PRESIDENT AND FELLOWS OF :
HARVARD COLLEGE (HARVARD :
CORPORATION), :
Defendant. :
- - - - -x

DEPOSITION OF ERICA J. BEVER, a witness
called on behalf of the Plaintiff, taken pursuant to
the Federal Rules of Civil Procedure, before
Alexander K. Loos, Registered Diplomate Reporter and
Notary Public in and for the Commonwealth of
Massachusetts, at the Offices of WilmerHale, 60
State Street, Boston, Massachusetts, on Thursday,
July 13, 2017, commencing at 9:00 a.m.

PRESENT:

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Reported By: Alexander K. Loos

Job No: 127040

1 ERICA J. BEVER

2 Q. And when you say "personal qualities and
3 character," what are you referring to?

4 A. A variety of things.

5 Q. Such as?

6 A. Again, concern for others.

7 Q. What else?

8 A. Qualities described by recommenders.

9 Q. Anything else?

10 MS. ELLSWORTH: Objection.

11 A. The student's own application materials.

12 Q. Like their academic application materials?

13 MS. ELLSWORTH: Objection.

14 A. I'm referring to their essay, how they
15 spend their time.

16 Q. In your experience does -- is a student's
17 race sometimes factored into their personal --

18 MS. ELLSWORTH: Objection.

19 Q. -- into their personal score?

20 MS. ELLSWORTH: Objection.

21 A. No.

22 Q. Do you think that's true with respect to
23 all readers?

24 MS. ELLSWORTH: Objection.

25 A. I cannot say what other readers do.

1
2 COMMONWEALTH OF MASSACHUSETTS)

3 SUFFOLK, SS.)

4 I, Alexander K. Loos, RDR and Notary Public in
5 and for the Commonwealth of Massachusetts, do hereby
6 certify that there came before me on the 13th day of
7 July, 2017, at 9:00 a.m., the person hereinbefore
8 named, who was by me duly sworn to testify to the
9 truth and nothing but the truth of her knowledge
10 touching and concerning the matters in controversy
11 in this cause; that she was thereupon examined upon
12 her oath, and her examination reduced to typewriting
13 under my direction; and that the deposition is a
14 true record of the testimony given by the witness.
15 I further certify that I am neither attorney or
16 counsel for, nor related to or employed by, any
17 attorney or counsel employed by the parties hereto
18 or financially interested in the action.
19

20 Under Federal Rule 30:

21 ☐ Reading and Signing was requested

22 ☐ Reading and Signing was waived

23 ☒ Reading and Signing was not requested
24
25