

Exhibit 2

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Erin E. Driver-Linn
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

STUDENTS FOR FAIR ADMISSIONS, INC.,
Plaintiff

vs. CA NO. 1:14-CV-14176

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE
(HARVARD CORPORATION),

Defendant

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

DEPOSITION OF: ERIN E. DRIVER-LINN

WILMERHALE

60 State Street

Boston, Massachusetts

July 27, 2017 9:03 a.m.

Darlene M. Coppola

Registered Merit Reporter

Certified Realtime Reporter

Job no. 127103

1 Erin E. Driver-Linn

2 designations.

3

4 (Exhibit No. 5 marked
5 for identification.)

6

7 BY MR. STRAWBRIDGE:

8 Q. I'm handing you a document that's
9 been marked as Exhibit 5.

10 Take a minute and familiarize
11 yourself with the document. Let me know if
12 you've seen it before.

13 A. (Witness reviews document.)

14 Yes, I have seen this document or
15 one very much like it.

16 Q. Did you, in fact, review this
17 document in preparation for your deposition
18 today?

19 A. I believe so.

20 Q. So what is this document?

21 A. Draft admissions, Part 2,
22 subtitle.

23 Q. But that's what it says on the
24 cover. But I'm asking for your description
25 of what this document is.

1 Erin E. Driver-Linn

2 MS. ELLSWORTH: Objection.

3 A. I believe it to be an internal work
4 product.

5 BY MR. STRAWBRIDGE:

6 Q. Why do you believe it to be an
7 internal work product?

8 A. Because it has blank pages, because
9 it has a subtitle called "subtitle,"
10 because the exhibits are very exploratory
11 and very limited.

12 Q. Who prepared this document?

13 A. I'm not sure.

14 Q. You don't have any idea who prepared
15 this documents?

16 MS. ELLSWORTH: Objection.

17 A. That's not what I said.

18 BY MR. STRAWBRIDGE:

19 Q. Okay. What do you know about who
20 prepared this document?

21 A. I think it likely involved Erica
22 Bever and/or Mark Hansen.

23 Q. Why do you think that?

24 A. Because they were working on similar
25 kinds of work products.

1 Erin E. Driver-Linn

2 Q. And why were they working on these
3 kinds of work products?

4 MS. ELLSWORTH: Objection.

5 A. Can you be more specific?

6 BY MR. STRAWBRIDGE:

7 Q. Yes.

8 How did this work product come into
9 being?

10 Who asked OIR to prepare this work
11 product?

12 MS. ELLSWORTH: Objection.

13 A. I don't know.

14 BY MR. STRAWBRIDGE:

15 Q. What steps did you take to try to
16 educate yourself as to how this work
17 product came into being in preparation for
18 your deposition today?

19 A. I looked at a document like this, or
20 maybe this exact one, talked with John
21 Scanlon and Liam Schwartz.

22 Q. And nobody -- none of them knew why
23 this document was created?

24 A. They did not remember.

25 Q. Was this document created to answer

1 Erin E. Driver-Linn

2 CERTIFICATION

3 I, DARLENE M. COPPOLA, a Notary Public, do hereby
4 certify that ERIN E. DRIVER-LINN, after having
5 satisfactorily identifying herself, came before me on
6 the 27th day of July, 2017, in Boston, Massachusetts,
7 and was by me duly sworn to testify to the truth and
8 nothing but the truth as to her knowledge touching and
9 concerning the matters in controversy in this cause;
10 that she was thereupon examined upon her oath and said
11 examination reduced to writing by me; and that the
12 statement is a true record of the testimony given by
13 the witness, to the best of my knowledge and ability.

14 I further certify that I am not a relative or
15 employee of counsel/attorney for any of the parties,
16 nor a relative or employee of such parties, nor am I
17 financially interested in the outcome of the action.

18 WITNESS MY HAND THIS 9th day of August, 2017.
19
20

21 _____
22 DARLENE M. COPPOLA

My commission expires:

23 NOTARY PUBLIC

November 11, 2022

24 REGISTERED MERIT REPORTER

25 CERTIFIED REALTIME REPORTER