

UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION

STUDENTS FOR FAIR ADMISSIONS,  
INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE (HARVARD  
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Massachusetts Local Rule 83.5.3(b), Oren Sellstrom, Esq., a member in good standing of the Bar of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts, moves for the admission of Laboni Hoq, a member of the California Bar, to this Court for the purpose of representing Student *Amici Curiae*<sup>1</sup> in the above-captioned matter, and states as follows:

1. Laboni Hoq is the Litigation Director at Asian Americans Advancing Justice – Los Angeles. Her business address is 1145 Wilshire Boulevard, Los Angeles, CA 90017 and her telephone number is (213) 241-0257.

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<sup>1</sup> Student *Amici Curiae* are a group of current and prospective students of Harvard whom the Court granted leave to participate in this action as *amici*. Order at 23, June 15, 2015, ECF No. 52.

2. Laboni Hoq is an active member of the California Bar with no record of discipline. There are no disciplinary proceedings pending against her as a member of the bar in any jurisdiction. See Declaration of Laboni Hoq, attached hereto as Exhibit A.

3. Laboni Hoq is familiar with the applicable provisions of the Local Rules of the United States District Court for the District of Massachusetts.

4. Oren Sellstrom, a member of the Bar of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts, will continue to represent Student *Amici Curiae* if this motion is granted.

5. Pursuant to Local Rule 7.1(a), Student *Amici Curiae* have conferred with counsel for the Plaintiff and Defendant and they have stated that they have no objection to this motion.

WHEREFORE, the Student *Amici Curiae* respectfully request that Laboni Hoq be admitted to practice before this Court *pro hac vice* for the purpose of appearing as counsel for Student *Amici Curiae* in the above referenced proceeding in accordance with the Rules of this Court.

Respectfully submitted,

Dated: June 7, 2019

/s/ Oren Sellstrom  
Oren Sellstrom, Esq.  
Lawyers for Civil Rights  
61 Battery March Street, 5<sup>th</sup> Floor  
Boston, MA 02110  
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ATTORNEY FOR *AMICI CURIAE*

# EXHIBIT A

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**DECLARATION OF LABONI HOQ**

I, LABONI HOQ, depose and state as follows:

1. I am an attorney licensed to practice law in California.
2. I am a resident of California.
3. I am the Litigation Director at Asian Americans Advancing Justice – Los Angeles, located at 1145 Wilshire Boulevard, Los Angeles, CA 90017. The office telephone number is (213) 241-0257.
4. I am authorized to practice law in the following federal court districts: United States District Courts for the Central and Northern Districts of California, the United States Courts of Appeals for the Third and Ninth Circuits, and the Supreme Court of the United States.
5. I was admitted to practice law in California on January 13, 2003. My California bar number is 224140.

6. I am an active member of the California Bar with no record of discipline or administrative actions.

7. I have never been suspended or disbarred in my jurisdiction, and there are no disciplinary actions pending against me in any federal or state court.

8. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

9. If the Court allows the Motion for me to appear *pro hac vice* in this matter, I will represent Student *Amicus Curiae* in this proceeding until the final determination thereof, and with reference to all matters, incidents, or proceedings, I agree that I shall be subject to the orders and to the disciplinary action and the civil jurisdiction of this Court in all respects as if I were regularly admitted.

Signed under the penalty of perjury on this 7<sup>th</sup> day of June, 2019.

/s/ Laboni Hoq

Laboni Hoq, Esq.

**CERTIFICATE OF SERVICE**

In accordance with Local Rule 5.2(b), I hereby certify that this document filed through the ECF system on June 7, 2019 will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Oren Sellstrom  
Oren Sellstrom