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),

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

Subject to Harvard's Motion to File Under Seal [Dkt. 72]

Defendant.

DECLARATION OF FELICIA H. ELLSWORTH

I, Felicia H. Ellsworth, hereby state under oath:

1. I am a member in good standing of the bar of the Commonwealth of

Massachusetts and this Court, and am a partner at the firm of Wilmer Cutler Pickering Hale and

Dorr LLP. I am one of the counsel representing the Defendant President and Fellows of Harvard

College (Harvard Corporation) ("Harvard") in the above-captioned matter. I submit this

declaration in connection with Harvard's Proposed Reply Memorandum In Support of the

Motion to Stay.

2. Attached hereto as Exhibit A is a true and accurate copy of excerpts of Plaintiff's Objections and Responses to Defendant's First Set of Interrogatories, which Students for Fair Admissions, Inc. ("SFFA") served upon Harvard on July 2, 2015.

Attached hereto as Exhibit B is a true and accurate copy of Plaintiff's
Supplemental Response to Interrogatory No. 5, which SFFA served upon Harvard on July 2,
2015.

I declare under penalty of perjury that the foregoing is true and correct.

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Executed on this day, July 21, 2015.

/s/ Felicia H. Ellsworth

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Dated: July 21, 2015

Counsel for Defendant President and Fellows of Harvard College

EXHIBIT A

(Exhibit Subject to Defendant President and Fellows of Harvard College's Motion to File Under Seal)

EXHIBIT B

(Exhibit Subject to Defendant President and Fellows of Harvard College's Motion to File Under Seal)