

**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

**PROPOSED DEFENDANT-INTERVENORS’  
MOTION TO STAY PROCEEDINGS PENDING APPEAL**

Consistent with the Notice of Appeal filed July 13, 2015 (Docket No. 60), and for the reasons set forth more fully in the accompanying memorandum, Proposed Defendant-Intervenors M.B., K.C., Y.D., G.E., A.G., I.G., R.H., J.L., R.S., Sarah Cole, Fadhil Moore, Arjini Kumari Nawal, Itzel Libertad Vasquez-Rodriguez, and Keyanna Wigglesworth (“the Students”) respectfully move to stay this litigation while the First Circuit resolves whether they have the right to intervene as parties to this case. The Students additionally support Harvard’s Motion to Stay proceedings while the Supreme Court decides *Fisher v. University of Texas at Austin*, No. 14-981(*Fisher II*) (Docket No. 58) because that stay would largely overlap with a stay pending appeal.

Respectfully submitted,

Dated: August 5, 2015

/s/ Priya A. Lane  
Priya A. Lane, BBO # 688499

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ATTORNEYS FOR PROPOSED  
DEFENDANT-INTERVENORS

**CERTIFICATE OF CONFERENCE**

In accordance with Local Rule 7.1(a), I hereby certify that I conferred in good faith with counsel for Plaintiff and Defendant in connection with this motion and have been unable to resolve or narrow the issues presented by this motion.

/s/ Jon M. Greenbaum  
Jon M. Greenbaum

**CERTIFICATE OF SERVICE**

In accordance with Local Rule 5.2(b), I hereby certify that this document filed through the ECF system on August 5, 2015 will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Priya A. Lane  
Priya A. Lane