UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

Civil Action No. 1:14-cv-954-LCB-JLW

THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, et al.,

Defendants.

UNOPPOSED MOTION TO CONSOLIDATE BRIEFING

Proposed Intervenors, by and through their undersigned counsel, hereby move this Court to permit Proposed Intervenors to file a single consolidated reply brief of fifteen pages in support of Proposed Intervenors' Motion to Intervene. In support thereof, Proposed Intervenors state as follows:

On June 30, 2015, Proposed Intervenors filed their Motion to Intervene.
(Dkt. No. 39).

On July 21, 2015, Plaintiff Students for Fair Admission, Inc. filed its
Opposition to Proposed Intervenors' Motion to Intervene. (Dkt. No. 50). On July 22,
2015, Defendants University of North Carolina at Chapel Hill, et al. filed their
Opposition to Proposed Intervenors' Motion to Intervene (Dkt. No. 51).

3. Proposed Intervenors respectfully request that the Court permit them to file a single consolidated reply brief of fifteen pages in response to both parties' opposition

briefs rather than two reply briefs of ten pages each. Proposed Intervenors will file the reply brief on or before the date that the earlier of the two reply briefs is due. Plaintiff Students for Fair Admission, Inc. and Defendants University of North Carolina at Chapel Hill, et al. have indicated that they do not oppose this Motion.

WHEREFORE, Proposed Intervenors respectfully request that this Court grant this Unopposed Motion to Consolidate Briefing and permit Proposed Intervenors to file a consolidated reply brief of no more than fifteen pages in support of their Motion to Intervene.

Dated: July 27, 2015

Respectfully submitted,

<u>/s/ Reed N. Colfax</u> Reed N. Colfax* Glenn Schlactus* Sasha Samberg-Champion* Laura Gaztambide-Arandes* RELMAN, DANE & COLFAX PLLC 1225 19th Street NW, Suite 600 Washington, DC 20036 rcolfax@relmanlaw.com gschlactus@relmanlaw.com ssamberg-champion@relmanlaw.com larandes@relmanlaw.com Tel: (202) 728-1888

<u>/s/ Jack Holtzman</u> Jack Holtzman, N.C. Bar No. 13548 Christine Bischoff, N.C. Bar No. 41792 NORTH CAROLINA JUSTICE CENTER 224 South Dawson Street Raleigh, NC 27601 jack@ncjustice.org christine@ncjustice.org Tel: (919) 856-2165 /s/ Jon M. Greenbaum Jon M. Greenbaum* LAWYERS' COMMITTEE FOR CIVIL RIGHTS UNDER LAW 1401 New York Avenue NW, Suite 400 Washington, DC 20005 jgreenbaum@lawyerscommittee.org Tel: (202) 662-8600

ATTORNEYS FOR PROPOSED DEFENDANT-INTERVENORS

* Special Appearance

CERTIFICATE OF SERVICE

In accordance with Local Rule 5.3(b)(2), I hereby certify that this document, filed through the CM-ECF system on July 27, 2015, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Reed N. Colfax Reed N. Colfax