

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

KAPPA ALPHA THETA FRATERNITY,	:	
INC.; KAPPA KAPPA GAMMA	:	
FRATERNITY; SIGMA CHI; SIGMA	:	
ALPHA EPSILON; SIGMA ALPHA	:	
EPSILON—MASSACHUSETTS	:	
GAMMA; JOHN DOE 1; JOHN DOE 2;	:	
JOHN DOE 3,	:	Civil Action No. 18-cv-12485
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
HARVARD UNIVERSITY; PRESIDENT	:	
AND FELLOWS OF HARVARD	:	
COLLEGE (HARVARD CORPORATION),	:	
	:	
Defendant.	:	
_____	:	

**PARTIES’ JOINT NOTICE OF SETTLEMENT AND  
REQUEST TO HOLD PENDING DISPOSITIVE MOTIONS IN ABEYANCE**

In light of the Parties’ expectation that this case will soon be voluntarily dismissed on the basis of a settlement, the Parties jointly request that the Court hold in abeyance their pending dispositive motions—specifically, Plaintiffs’ motion for preliminary or permanent injunction (Dkt. 57), and Defendant Harvard’s motion to dismiss the case as moot (Dkt. 59).

Dated: August 21, 2020

/s/ R. Stanton Jones

R. Stanton Jones (*pro hac vice*)  
John A. Freedman (BBO # 629778)  
Andrew T. Tutt (*pro hac vice*)  
Jayce Born (*pro hac vice*)  
ARNOLD & PORTER KAYE SCHOLER LLP  
601 Massachusetts Ave., NW  
Washington, DC 20001  
(202) 942-5000  
stanton.jones@arnoldporter.com  
john.freedman@arnoldporter.com  
andrew.tutt@arnoldporter.com  
jayce.born@arnoldporter.com

Sara L. Shudofsky (*pro hac vice*)  
Ada Añon (*pro hac vice*)  
ARNOLD & PORTER KAYE SCHOLER LLP  
250 West 55th Street  
New York, NY 10019  
(212) 836-8000  
sara.shudofsky@arnoldporter.com  
ada.anon@arnoldporter.com

*Counsel for Plaintiffs*

Respectfully submitted,

/s/ Roberto M. Braceras

Roberto M. Braceras (BBO# 566816)  
Roberto M. Braceras (BBO# 566816)  
Michael K. Murray (BBO# 563804)  
Edwina B. Clarke (BBO# 699702)  
Martin C. Topol (BBO# 696020)  
Andrew S. McDonough (BBO# 698612)  
GOODWIN PROCTER LLP  
100 Northern Avenue  
Boston, Massachusetts 02210  
Tel.: +1 617 570 1000  
Fax.: +1 617 523 1231  
Email: rbraceras@goodwinlaw.com  
mmurray@goodwinlaw.com  
eclarke@goodwinlaw.com  
mtopol@goodwinlaw.com  
amcdonough@goodwinlaw.com

William M. Jay (*pro hac vice*)  
GOODWIN PROCTER LLP  
1900 N Street NW  
Washington, DC 20036  
Tel.: +1 202 346 4000  
Fax.: +1 202 346 4444  
E-mail: wjay@goodwinlaw.com

*Counsel for Defendant President and  
Fellows of Harvard College*

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on the date of electronic filing.

/s/ R. Stanton Jones  
R. Stanton Jones  
601 Massachusetts Ave. NW  
Washington, DC 20001  
(202) 942-5000  
stanton.jones@arnoldporter.com