

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

NATIONAL ASSOCIATION OF THE )  
DEAF, *et al.*, )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
HARVARD UNIVERSITY and the )  
PRESIDENT AND FELLOWS OF )  
HARVARD COLLEGE, )  
 )  
Defendants. )  
\_\_\_\_\_ )

Civil Action No. 3:15-cv-30023-MGM

THE UNITED STATES OF AMERICA’S REPLY TO DEFENDENTS’ OBJECTIONS TO  
THE MAGISTRATE JUDGE’S REPORT AND RECOMMENDATIONS

The United States respectfully opposes Harvard's Objections to the Magistrate Judge's Report and Recommendations (ECF No. 63) for the reasons set forth in its Statement of Interest in this case (ECF No. 33).

Respectfully submitted this 8<sup>th</sup> day of April, 2016.

CARMEN M. ORTIZ  
United States Attorney  
District of Massachusetts

JENNIFER A. SERAFYN  
STEPHEN P. HEYMANN  
Assistant United States Attorneys  
District of Massachusetts  
John Joseph Moakley Federal Courthouse  
One Courthouse Way, Suite 9200  
Boston, MA 02210  
Telephone: (617) 748-3188  
[jennifer.serafyn@usdoj.gov](mailto:jennifer.serafyn@usdoj.gov)

JAMES COLE, JR.  
General Counsel  
United States Department of Education

FRANCISCO LOPEZ  
MICHELLE TUCKER  
Attorneys  
United States Department of Education  
Office of General Counsel  
400 Maryland Ave, S.W.  
Washington, D.C. 20202

LORETTA E. LYNCH  
Attorney General for the United States

VANITA GUPTA  
Principal Deputy Assistant Attorney General  
Civil Rights Division

EVE L. HILL  
Deputy Assistant Attorney General  
Civil Rights Division

REBECCA B. BOND  
Chief  
Disability Rights Section

KATHLEEN P. WOLFE  
Special Litigation Counsel  
Disability Rights Section

AMANDA L. MAISELS  
Deputy Chief  
Disability Rights Section

*/s/ Charlotte Lanvers*  
CHARLOTTE LANVERS  
Trial Attorney  
Disability Rights Section  
Civil Rights Division  
United States Department of Justice  
950 Pennsylvania Avenue, N.W., (NYA)  
Washington, D.C. 20530  
Telephone: (202) 305-0706  
[charlotte.lanvers@usdoj.gov](mailto:charlotte.lanvers@usdoj.gov)

*Counsel for the United States*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document, filed through the CM/ECF system on this 8<sup>th</sup> day of April, 2016, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF). I am not aware of any non-registered participants, so electronic filing is the sole means of service of this document.

Respectfully submitted,

/s/ Charlotte Lanvers

CHARLOTTE LANVERS

Trial Attorney

Disability Rights Section

Civil Rights Division

United States Department of Justice

950 Pennsylvania Avenue, N.W. (NYA)

Washington, D.C. 20530

Telephone: (202) 305-0706

charlotte.lanvers@usdoj.gov

*Counsel for the United States of America*