No. 20-1199

In the Supreme Court of the United States

STUDENTS FOR FAIR ADMISSIONS, INC.,

Petitioner,

v.

PRESIDENT AND FELLOWS OF HARVARD COLLEGE,

Respondent.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the First Circuit

BRIEF OF HAMILTON LINCOLN LAW INSTITUTE AS *AMICUS CURIAE* IN SUPPORT OF PETITIONER

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STATEMENT OF INTEREST

Hamilton Lincoln Law Institute ("HLLI") is a public-interest law firm dedicated to protecting free markets, free speech, limited government, and separation of powers, and against regulatory abuse and rent-seeking.[1] Its subunit, the Center for Class Action Fairness represents class members *pro bono* in class actions where class counsel employs unfair class-action procedures to benefit themselves at the expense of the class. HLLI has emerged as America's leading defender of consumers and shareholders against abusive class-action settlements, winning hundreds of millions of dollars for these stakeholders, and setting precedents that safeguard consumers, investors, courts, and the public.

In its litigation practice HLLI has directly confronted, and unsuccessfully sought this Court's intervention to halt,[2] the pervasive expansion of race-conscious decision-making into areas outside university admissions by those insisting on the propriety of that action using the language of *Grutter v. Bollinger*.[3]

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[1] Pursuant to Rule 37.2(a), all parties have consented to this brief. Counsel of record for all parties received notice at least 10 days prior to the due date of the *Amicus Curiae*'s intention to file this brief and responded with consent in writing.

Pursuant to Rule 37.6, *Amicus Curiae* affirms that no counsel for a party authored this brief in full or in part, and that no person or entity other than *Amicus* or their counsel financially contributed to preparing or submitting this brief.

[2] *Martin v. Blessing*, 571 U.S. 1040 (2013).

[3] 539 U.S. 306 (2003).

SUMMARY OF ARGUMENT

HLLI shares petitioner's conclusion that *Grutter* has generated no legitimate reliance interests. It could not have done so, because when precedent "undermines the fundamental principle of equal protection as a personal right," it is "the principle," not the decision, which "must prevail." *Adarand Constructors, Inc. v. Peña*, 515 U.S. 200, 235 (1995). It cannot have generated reliance interests, because *Grutter* itself required that the "race-conscious admissions policies" that it authorized "must be limited in time" and should face "sunset provisions" forcing regular "reviews to determine whether racial preferences are still necessary," all with the "expect[ation] that 25 years from now, the use of racial preferences will no longer be necessary." *Grutter*, 539 U.S. at 342, 343.

What this Court authorized in *Grutter* as a temporary, grudging exception to America's ideals and generally applicable law of Equal Protection has "caused significant … real-world consequences." *Ramos v. Louisiana*, 140 S. Ct. 1390, 1415 (2020) (Kavanaugh, J., concurring in part) (discussing reasons to overrule precedent). In many ways its effect has metastasized into a threat blooming across the legal landscape, the economy, and the culture as a whole. Despite its language to the contrary, *Grutter* has signaled beyond the university-admission context that it may be legally permissible for government actors to discriminate on the basis of race.

The Court should take the opportunity before it to excise that threat at its root and begin to rehabilitate American ideals and constitutional law by overruling *Grutter*

and thus confining it as a temporary aberration from equal-protection principles.

ARGUMENT

I. *Grutter* is a grudging exception to the well-defined rule that group classifications based on race are prohibited in all but the most narrowly tailored instances.

While *Grutter* "endorse[d the] view that student body diversity is a compelling state interest that can justify the use of race in university admissions," 539 U.S. at 325, one must pause to notice exactly how much Justice O'Connor (and the Court's decisions since *Grutter*) did wall in that holding.

Grutter pays lip-service to the general rules the courts apply to all racial policy-making, reiterating that (a) "the Fourteenth Amendment protects persons, not groups," leaving "all governmental action based on race—a group classification long recognized as in most circumstances irrelevant and therefore prohibited--…subject to detailed judicial inquiry to ensure that the personal right to equal protection of the laws has not been infringed"; and (b) "such classifications are constitutional only if they are narrowly tailored to further compelling governmental interests." *Grutter*, 539 U.S. at 326 (cleaned up).

Even so, *Grutter* went on to approve grudgingly the University of Michigan Law School's racially discriminatory admissions program, because of a host of specific requirements that it purported to find Michigan to have satisfied. First, *Grutter* approved the program not as serving an interest in diversity-for-its-own-sake, but only as advancing a purportedly legitimate interest in obtain-

ing for students the alleged educational benefits of maintaining a racially diverse student body. *Grutter*, 539 U.S. at 328; *see Parents Involved in Cmty. Sch. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701, 729 (2007) (reiterating that "racial balancing" is not a compelling state interest). It did so, only on finding that Michigan's program was narrowly tailored to advance that end, specifically noting (and requiring) that it: (a) sought an amorphous critical mass, rather than a specific number of students of particular races, *Grutter*, 539 U.S. at 335–36; (b) demonstrably followed from the "serious, good faith consideration of workable race-neutral alternatives that will achieve the diversity the university seeks," *id.* at 339; (c) did "not unduly harm members of any racial group," so that no "rejected applicant will … have been foreclosed from all consideration … simply because he was not the right color or had the wrong surname," *id.* at 341 (cleaned up); and (d) "be limited in time" with a "durational requirement" forcing "periodic reviews to determine whether racial preferences are still necessary to achieve" the purported educational benefits of racial balancing, *id.* at 342.

Because of these limits, the Court could persuade itself that it was doing no harm to the larger canvas of American constitutional law. Acting on what it styled the "long recognized … important purpose of public education," *Grutter* purported to grant "universities" a "special niche in our constitutional tradition," *id.* at 329, rather than establishing that any other institution could similarly discriminate on the basis of race, whenever its insiders decided it would aid their institutional purpose.

II. Race-conscious decisions spread, infecting areas off limits under judicial precedent, under aegis of *Grutter*'s language.

But however carefully the Court sought to cabin off its precedent in *Grutter*, the "diversity" rationale for racial discrimination has refused to stay put. Other actors, disregarding *Grutter*'s limits, have taken it as a warrant to bring back racial discrimination in field after field where federal law and this Court's precedents have long made clear that it is forbidden. The exception is swallowing the rule, reaching back to infect and defeat even the guaranties of our oldest post-Civil-War, Civil-Rights protections.

Actors have brought racially discriminatory decision-making to internal decisions of America's universities (where their choices are unshielded by *Grutter*'s narrow allowance for admissions departments). They have returned racial considerations to the assignment of students to K-12 public schools. Federal courts have even adopted a "diversity" justification for discrimination in appointing class counsel. And now, private actors have even returned to announcing that they will refuse to contract with parties or alter the terms of their contracts with parties, unless those parties discriminate on the basis of race in their hiring, firing, promotional, and assignment decisions.

Such is the fruit of *Grutter* across the American legal landscape.

A. Universities discriminating on the basis of race in allocating post-admission honors.

Grutter found that universities' interest in providing the putative educational benefits of a diverse student body was enough to allow Michigan's race-conscious admissions program to satisfy strict scrutiny. It did not more broadly

authorize universities to discriminate on the basis of race. Universities do not appear to have noticed the difference, though. A proliferation of stories suggests ongoing violations of the requirements of Title VI (and, for public schools, the 14th Amendment) by schools engaging in race-conscious, on-campus decisions untethered to admissions standards and the approved goal of achieving diverse demographics in student bodies as a whole.

For example, just last month, George Mason University announced the proposal of a racially-discriminatory hiring program geared toward obtaining a faculty and staff reflective of the demographics of its student population. The public university proposed this program, despite this Court having specifically ruled that schools may not discriminate in hiring to produce faculty-student demographic match.[4] "With the issues of diversity, inclusion, equity and social justice at the forefront of national events," the school proposed race-based hiring as part of a campaign "to become a national exemplar of anti-racism[5]

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[4] *Wygant v. Jackson Bd. of Educ.*, 476 U.S. 267, 275 (1986) (plurality opinion) (rejecting justification of firing-decision on basis of race, because it "allows the [school] to engage in discriminatory hiring and layoff practices long past the point required by any legitimate remedial purpose. Indeed, by tying the required percentage of minority teachers to the percentage of minority students, it requires just the sort of year-to-year calibration the Court stated was unnecessary.").

[5] One should note that "anti-racism" is an Orwellian term. As propounded by leading critical race theorist Ibram X. Kendi, who baldly states in his best-selling book *How to Be an Antiracist*: "'The only remedy to racist discrimination is antiracist discrimination. The only remedy to past discrimination is present discrimination…. The only remedy to present discrimination is future discrimination.'" Noah Rothman, *Searching for the 'Anti' in 'Antiracism,'* Commentary (Dec. 21, 2020). "The 'discrimination' critical race theorists want to

and inclusive excellence."[6] It did so, with no apparent consideration of the Constitutional question raised or this Court's on-point precedent.

Also last month, the Yale Law Journal (a subdivision of federal-funding recipient Yale University, with no separate legal existence), revealed that its membership selection process—which uses "diversity statement[s]"—results in the election of students of different races at vastly disproportionate rates. Aaron Sibarium, *Yale Law Students Said a Top Journal was Racist. Admissions Data Suggest Otherwise*, The Washington Free Beacon (Feb. 21, 2021). While only discovery could confirm further, the disclosed data suggests that the journal membership is intentionally discriminating on the basis of race in choosing whom to admit to its board, in likely violation of Title VI. (Despite this set of racial preferences, activists at the school demand even more in the way of racial preferences. *Id.*) Indeed, Yale Law Journal's admissions about the racial disparities in its selection rates bring to mind similar allegations in pending Second Circuit litigation,

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'remedy,' through still more discrimination, is any failure to meet a racial quota. As Mr. Kendi puts it, 'When I see racial disparities, I see racism.'" Hans Bader, *Is the Cure for Racism Really More Racism?*, Wall St. J. (Oct. 12, 2020).

[6] John Hollis, *President Washington announces membership to the Anti-Racism and Inclusive Excellence Task Force*, George Mason University (Sep. 3, 2020), https://www2.gmu.edu/news/2020-09/president-washington-announces-membership-anti-racism-and-inclusive-excellence-task (last visited Mar. 3, 2021) (emphasis added).

challenging the legality of alleged racial selection criteria for membership on a law journal of New York University.[7]

B. K-12 school systems re-incorporating race into school assignments.

Outside the ambit of *Grutter*'s "special niche" for universities, a spate of public school systems has recently altered their policies for placement of students, because of concerns over the race of the students placed in particular schools. In Fairfax,[8] Boston,[9] San Francisco,[10] and New

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[7] *See Faculty, Alumni, & Students Opposed to Racial Preferences v. New York Univ.*, No. 20-1508 (2d Cir.).

[8] Hannah Natanson, *Fairfax School Board Switches to 'Holistic Review' Admissions System for Thomas Jefferson High School*, Wash. Post (Dec. 17, 2020) (citing "[d]iscontent over the demographics" of this "70 percent Asian" school as justification for move). The move is the subject of litigation for discrimination against Asian-Americans. *Coalition for TJ v. Fairfax County Sch. Board*, No. 1:21-cv-296 (E.D. Va.).

[9] Meg Woolhouse, *Boston Public Schools Suspends Test for Advanced Learning Classes; Concerns About Program's Racial Inequities Linger*, GBH News (Feb. 26, 2021), https://www.wgbh.org/news/education/2021/02/26/citing-racial-inequities-boston-public-schools-suspend-advanced-learning-classes (last visited Mar. 3, 2021) (quoting Superintendent Cassellius as explaining move as part of "work we have to do in the district to be antiracist"); for current school demographics, including 29% Asian American enrollment, see *Boston Latin*, Public School Review, https://www.publicschoolreview.com/boston-latin-profile (last visited Mar. 3, 2021).

[10] David K. Li, *San Francisco School Board Eliminates Academic Admission Standards for Renowned School*, NBC News (Feb. 10, 2021) (describing Lowell High School as "50.6 percent Asian," and quoting San Francisco Unified School District's passed resolution abandoning use of grades and standardized tests for Lowell High admission as justified by these criteria having "created a school that

York,[11] public-school administrators concerned by the number of Asian-Americans qualifying for seats at prestigious magnet schools have chosen to do away with quantifiable metrics for admission, usually in favor of "holistic" processes.

Here, too, the Court has emphasized that the Constitution does not countenance racially motivated decisions of which students may attend which elementary and secondary schools. "The Court in *Grutter* expressly articulated key limitations on its holding— … noting the unique context of higher education—but these limitations were largely disregarded by the lower courts in extending *Grutter* to uphold race-based assignments in elementary and secondary schools. The present cases are not governed by *Grutter*." *Parents Involved in Cmty. Sch.*, 551 U.S. at 725; *see also Brown v. Bd. of Educ.*, 347 U.S. 483 (1954).

That clarity has not stopped decision-makers citing the importance of "diversity" and "demographics" to their enterprise and following what they apparently misperceive to be the meaning of *Grutter* into the morass of racial allocations.

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does not reflect the diversity of SFUSD students and perpetuates segregation and exclusion").

[11] Alex Zimmerman & Monica Disare, *De Blasio's Specialized School Proposal Spurs Outrage in Asian Communities*, Chalkbeat New York (Jun. 5, 2018), https://ny.chalkbeat.org/2018/6/5/21105142/de-blasio-s-specialized-school-proposal-spurs-outrage-in-asian-communities (last visited Mar. 3, 2021) (citing subject schools as having 62% Asian American enrollment and goal of admissions policy change as "to boost diversity at the city's elite high schools" by "enroll[ing] more black and Hispanic students").

C. Courts discriminating on the basis of race in appointing class counsel.

Closest to home for HLLI, even courts—which should know best the illegality of treading these grounds—have followed the culturally received understanding of *Grutter* into race-based allocations in the nominal service of "diversity."

The Center for Class Action Fairness once asked this Court to review a district court order forcing class-counsel to discriminate in staffing legal matters on the basis of race. *Martin v. Blessing*, 571 U.S. 1040. At that time, the Court declined, with at least one Justice partially justifying that decision by reference to what he perceived as the "highly unusual practice followed by one District Court Judge," the "uniqueness" of which "weigh[ed] against review by this Court," despite being "hard-pressed to see any ground on which [the judge's] practice can be defended." *Id.* at 1041-42 (Alito, J., respecting denial of *writ of certiorari*). The judge in question was unapologetic, even after this opinion. Ian Millhiser, *Federal Judge Slams Justice Alito's Lack Of 'Understanding Or Interest' In Race Or Gender Equality*, ThinkProgress (Dec. 9, 2013).

Unfortunately, in the years since the 2013 opinion, despite its warning, this legally indefensible practice is hardly "unique." Last fall, for example, a district court judge in the Southern District of New York concluded that the race and sex of potential class-counsel's lawyers "is a relevant factor for the [c]ourt," as "[f]or well over a decade now, the courts have emphasized the importance of diversity in their selection of counsel." *City of Providence v. AbbVie Inc.*, 2020 U.S. Dist. LEXIS 189472, at *26, 2020 WL 6049139 (S.D.N.Y. Oct. 13, 2020). Judge Liman cited examples from far-flung district courts in several circuits.

Id. (citing *In re Robinhood Outage Litig.*, No. 20-cv-01626-JD (N.D. Cal. July 14, 2020); *SEC v. Adams*, 2018 U.S. Dist. LEXIS 93837, 2018 WL 2465763, at *4 n.6 (S.D. Miss. June 1, 2018); *In re Oil Spill by Oil Rig Deepwater Horizon*, 295 F.R.D. 112, 137-38 (E.D. La. 2013); *Public Employees' Ret. Sys. of Miss. v. Goldman Sachs Group, Inc.*, 280 F.R.D. 130, 142 n.6 (S.D.N.Y. 2012); *In re Dynex Capital, Inc. Sec. Litig.*, 2011 U.S. Dist. LEXIS 22484, 2011 WL 781215, at *9 (S.D.N.Y. Mar. 7, 2011); *In re J.P. Morgan Chase Cash Balance Litig.*, 242 F.R.D. 265, 277 (S.D.N.Y. 2007)). District courts' selection of class-counsel based on "diversity" concerns rather than exclusively on the Rule 23 factors show no sign of abating.[12]

How could so many district courts get this so wrong? Judge Liman again helpfully provides the answer, explaining that "[a] commitment to diversity is not a commitment to quotas. *See Grutter v. Bollinger*, 539 U.S. 306, 334, 123 S. Ct. 2325, 156 L. Ed. 2d 304 (2003) (rejecting the use of racial quotas in the race-conscious affirmative action

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[12] Amanda Bronstad, *MDL Judge Taps "Most Diverse Leadership Team Ever" in Data Breach Class Action*, National L. J. (Mar. 3, 2021) (covering appointment in *In re Blackbaud, Inc., Customer Data Breach Litig.*, 3:20-mn-02972-JMC (D.S.C.)); Case Management Order No. 2 (Organizational Structure and Appointment of Counsel Leadership), *Blackbaud*, Dkt. 14 at 5 (reflecting in "Appointment of Plaintiffs' Counsel Leadership" section that despite "[t]he court desir[ing] to appoint individuals, not firms," it was "committed to the diversity of MDL leadership. Given the multitude of claims … from diverse Plaintiffs … diverse leadership is integral to the success of these proceedings. The court also seeks to develop the future generation of diverse MDL leadership by providing competent candidates with opportunities for substantive participation now.").

context while recognizing a compelling interest in promoting diversity)." The lower courts, too, are using "diversity" and *Grutter*'s presumptive blessing to justify allocating benefits on the basis of race.

D. Private businesses adopting "diversity" as justification for discriminating on the basis of race in hiring and contracting.

The Civil Rights Act of 1866, America's first civil rights legislation pre-dating even Congress's passage of the 14th Amendment; as amended, it guarantees all Americans "the same right" to "make and enforce contracts," including "the making, performance, modification, and termination of contracts, and the enjoyment of all benefits, privileges, terms, and conditions of the contractual relationship." 42 U.S.C. § 1981.

Save only for the narrow exceptions this Court has recognized,[13] these guarantees bar employers (including law firms) from discriminating on the basis of race in their hiring, firing, assignments, and promotions of individuals.[14]

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[13] *U.S. Steelworkers of Am. v. Weber*, 443 U.S. 193 (1979) (recognizing narrow exception to parallel provisions of Title VII of the Civil Rights Act of 1964); *Schurr v. Resorts Int'l Hotel, Inc.*, 196 F.3d 486, 498-99 (3rd Cir. 1999) (treating Title VII and § 1981 claims as co-extensive in scope); *Marsh v. Bd. of Ed.*, 581 F. Supp. 614, 619-26 (E.D. Mich. 1984) (extending *Weber* to § 1981 claims) (vacated on appeal on other grounds).

[14] Curt Levey, *The Legal Implications of Complying with Race and Gender-Based Client Preferences*, 8 Federalist Soc'y Rev. 14 (2007).

They also bar parties from discriminating in their contracting with corporations because of the race of their counter-parties' personnel.[15]

And yet, citing the importance of "diversity," major American corporations have recently announced as policy an intention to discriminate in their contracting because of the race of their counterparties' personnel.[16] Again, the

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[15] *Brown v. J. Kaz., Inc.*, 581 F.3d 175, 181 (3rd Cir. 2009) (reversing dismissal of a contractor's § 1981 claim and clarifying that statute applies beyond employment scenarios); *Vill. Green at Sayville, LLC v. Town of Islip*, 2019 U.S. Dist. LEXIS 167177, at *22, 2019 WL 4737054 (E.D.N.Y. Sept. 27, 2019) (denying motion to dismiss corporate plaintiff's § 1981 claim against town whose allegedly racially motivated inaction rendered plaintiff's contract unperformable); *Annuity, Welfare & Apprenticeship Skill Improvement & Safety Funds of the Int'l Union of Operating Eng'rs, Local 15, 15A, 15C & 15D v. Tightseal Constr., Inc.*, 2018 U.S. Dist. LEXIS 138041, at *16-*18, 2018 WL 3910827 (S.D.N.Y. Aug. 14, 2018) (denying motion to dismiss corporate plaintiff's § 1981 claim for termination of contract allegedly because of race of plaintiff's personnel).

[16] *McDonald's Overhauling Workplace Culture to Meet Diversity Goals*, CBS News (Feb. 18, 2021), https://news.yahoo.com/mcdonalds-overhauling-workplace-culture-meet-024002414.html (last visited Mar. 4, 2021) (reflecting announcement that company will tie executive compensation to the race of those working for those executives); Sam Skolnik, *Novartis Demands Outside Counsel Make Tough Diversity Guarantees*, Bloomberg Law (Feb. 12, 2021), https://news.bloomberglaw.com/us-law-week/novartis-demands-outside-counsel-make-tough-diversity-guarantees (last visited Mar. 4, 2021) (conditioning 15% of bills on firms staffing matters in compliance with "diversity" requirements, so demonstrating "commit[ment] to being a leader in diversity and inclusion"); Ruiqi Chen, *Coke GC Tired of "Good Intentions," Wants Firm Diversity Now*, Bloomberg Law (Jan. 28, 2021), https://news.bloomberglaw.com/business-and-practice/coke-gc-tired-of-good-intentions-wants-law-firm-diversity-

language employed in the announcements pegs these actions to *Grutter*'s widely perceived blessing of racial discrimination undertaken in the name of achieving "diversity."

* * *

Racism still exists, but we no longer live in the injustice of Jim Crow America, which ended decades before *Grutter*. Since *Grutter*, America has elected an African-American president and an African-American vice-president; indeed, major parties' African-American nominees have won three out of three national elections. Since *Grutter*, African-Americans have won Gallup's "Most Admired Man" or "Most Admired Woman" annual poll fifteen times in the last thirteen years. *Gallup's most admired man and woman poll*, Wikipedia (Mar. 28, 2021). Racial prejudice against African-Americans is no longer even remotely socially acceptable; indeed, prominent media people lose their jobs simply because they fail to be sufficiently supportive of the so-called antiracism movement. *E.g.*, Editors, *Canceled: A Running List of the People, Places, and Things That Have Been Toppled as the Country Reckons with Racism*, Los Angeles Magazine (Jun. 11, 2020). American icons like Coca-Cola and McDonald's are so opposed to discrimination against African-Americans that they are willing to risk violating the law to demonstrate that opposition beyond lip service. America as a country is blessedly past the point where African-Americans cannot

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now (last visited Mar. 4, 2021) (among other items, conditioning payment of 30% of bills on firms staffing matters in compliance with "diversity" requirements, while also conditioning both future retentions and placement on "Preferred Firm Panel" on compliance).

succeed because past discrimination has been inadequately remedied. "'Structural racism' isn't an explanation, it's an empty category." Glenn Loury, *Unspeakable Truths about Racial Inequality in America*, Quillette (Feb. 10, 2021). Even under its own terms, it is time for *Grutter* to end. "The way to stop discrimination on the basis of race is to stop discriminating on the basis of race." *Parents Involved in Cmty. Sch.*, 551 U.S. at 748.

CONCLUSION

All across the American legal landscape, actors share the same misreading of *Grutter* and believe it to have created a "diversity-serving" exception stronger than the Constitution's general rule against race-based decision-making. But the Court never sought that broadened application and that Justice O'Connor affirmatively sought to prevent it in writing *Grutter*. *Grutter* has not succeeded in carving out a "special niche" for universities to engage in otherwise forbidden race-based decision-making. Instead, it has invited a systemic assault on America's deeply cherished principles of equal protection. When combined with the dramatic racial progress America has made in the last two decades, it is time for *Grutter*'s self-envisioned sunset.

The petition for a writ of certiorari should be granted to allow the Court to take that step.

Respectfully submitted,

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