No. 20-843

In the
Supreme Court of the United States

STUDENTS FOR FAIR ADMISSIONS
Petitioners,

v.

UNIVERSITY OF NORTH CAROLINA
RESPONDENT

On Writ of Certiorari to the U.S. Court of Appeals for the Second Circuit

BRIEF FOR RESPONDENTS

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QUESTIONS PRESENTED

Should this Court overrule Grutter V. Bollinger, 539 U.S 306 (2003), and hold that institutions of higher education cannot use race as a factor in admissions?

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SUMMARY OF ARGUMENT

Affirmative action has a significant past precedent that suffices to show how race can be used in higher education that should be sustained. Furthermore, affirmative action is necessary for the national benefits of diversity that the use of race in college admissions brings. Additionally, affirmative action has proven consistent with the fourteenth amendment as it has met strict scrutiny by demonstrating a compelling governmental interest and has been narrowly tailored to meet the such claim. Thus, it does not violate the rights of any student per the use of race in college admissions. Finally, *Grutter v. Bollinger* has demonstrated constitutional permissibility, and stare decisis can be used in this case.

ARGUMENT

I. There is sufficient past precedent that demonstrates why race can be used in higher education and the national benefits of diversity as demonstrated in past cases.

There is sufficient past precedent in regards to the use of race in higher education. Past precedent is continually used as courts rule a stare decisis where they

follow the ruling of past cases. Which leads in as the University of North Carolina is not the first University to use race in its admissions process. And It is certainly not the first University taken to the supreme court revolving the constitutionality of affirmative action in consideration to the fourteenth amendment. In fact The first case about strict scrutiny was *Regents of the University of California V. Bakke, 438 U.S. 265 (1978)* which was ruled in 1978. California's affirmative action program was held unconstitutional with a 5-4 majority. However the court sustained that the school could still in fact use race in college admissions because of their compelling interest in diversity. This case later directly influenced the ruling of the second case revolving affirmative action. *Grutter V. Bollinger, 539 U.S. 306 (2003).* In *Grutter V. Bollinger, 539 U.S. 306 (2003)* a college student, alleged that her rights were violated because the Michigan school of Law utilized race in admissions. The court ruled that the schools use of race was constitutional, because the consideration of race

was a holistic process. The ruling was based on the facts that Michigan Law used a critical mass unlike the school in *Regents of the University of California V. Bakke, 438 U.S. 265 (1978)* that used a quota system. A critical mass per the majority opinions is described as "meaningful numbers" or in this case "meaning full representation" Which differs from a quota as a quota would cause a school to create race as a major deciding factor in admissions in order to get a predetermined number of people from a certain race. But a critical mass would cause race to simply be one of many considered factors as the University does not have to meet an exact amount. This directly relates to this case of Students for fair admissions V. University of North Carolina as the University does not use a quota system and instead a critical mass. That ensures that race is not the deciding factor in the admissions process for all people of different races. *Grutter V. Bollinger* 539 U.S. 306 (2003) is the case in question of being overturned by the Court. Although as stated *Grutter V. Bollinger* 539 U.S. 306 (2003)

accurately follows *Bakke* as it follows a critical mass. The Next case relevant to today's case was held in 2007 it was *Parents Involved in Community Schools V. Seattle School Dist. No. 1, 551 U.S. 701 (2007)*. It involved a Seattle district that allowed students to apply to a specific highschool. Parents involved in Community Schools sued the district for violating the students fourteenth amendment right as the applications included their race. They argued that the inclusion of race created leeway for discrimination. Although the District argued it was only for the basis of diversity. The courts ruled it unconstitutional because the program's only goal was to ensure racial diversity instead of more holistic "diversity in higher education" Which is different from University of North Carolina's process as they are a place of higher education that look at applications holistically. As places of higher education look at many other factors instead of just race being the one or the main as, holistic in itself means to look at things beyond both race and gender to ensure all things

work together. So in order that these Universities such as UNC to obtain a more diverse campus they use holistic diversity which differs from the case *Parents Involved in Community Schools V. Seattle School Dist. No. 1, 551 U.S 701 (2007)* as it is not impending the question of admission seemingly solely on race.

Diving further into past precedent, *Fisher V. University of Austin l, 133 S. Ct. 2411 (2013)* and *Fisher V. University of Austin ll, 136 S.Ct. 2198 (2016)* are the most relevant to today's case . Ms. Fisher, a student, believed her rights were violated by the University of Austin, as it used race in their admissions process. At the supreme court University of Austin's policy was upheld and, as stated in Justice Kennedy's majority opinion, none of the other alternatives was workable means for the university to attend the benefits of diversity it sought" If the courts were to rule in favor of the petitioner it would be blatantly ignoring incredibly recent president surrounding affirmative action in education. Fisher's facts are made more comparable to

the case before the court today than *Parents involved in community schools v. Seattle School Dist. No. 1, 551 U.S. 701 (2007)*, both in level of education and in admissions schemes.

The ruling in favor of the University of Austin is in the same way our case should be ruled in favor of the University of North Carolina.

All past precedent surrounding affirmative action is sufficient in determining the constitutionality of the fourteenth amendment and should be maintained. The courts past establishment of precedent is consecutive and concise. As it weighs in the use of race holistically, in consideration for a critical mass, and in a compelling governmental interest.

B. Affirmative action contributes the national benefits of diversity

The national benefits of diversity in education is sufficient enough to sustain the use of race in higher education and demonstrate its necessity. The fourteenth amendment to

the US constitution was passed on june 8th 1866 with the primary purpose of putting into writing the citizenship of those who were subject to the cruelty of slavery. It states that “Nor shall any deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.” The court must determine whether the consideration of race in admissions harms students and their rights, it does not. The laws amendment was ratified to help combat the many black codes that littered the states. Black Codes are restrictive laws designed to limit the freedom of african americans and ensure their availability as cheap labor after slavery was abolished after the civil war. They were trying to keep cheap labor by not letting them buy houses and therefore forcing them into sharecropping. Sharecropping was a system that let a group of people stay on the owners land to harvest crops and receive some of the crop themselves to eat. Sharecropping was taken up by many as it offered a two in one deal of both a home and food. If there

were no colored schools in the area there would be no chance for education but at least there would be a place to stay. Even if there was a school that did not guarantee the child would go as the family needed extra hands on the farm or maybe they would go and hurry home to work with no one at home who could help with their work as they were potentially the first generation to get an education. The Act of March 3, 1865 which was passed by president Lincoln and Established the Freedmen's Bureau under the War department, in order to combat the inequality in the United States and to assist former slaves in integrating into United States citizen ship. Consequently, the Freedmen's Bureau went to be a major aide in civil rights and reconstruction, but one of its most successful regions ended up being in education, as it made education available to all black americans. In the 1st session of 38th Congress in 1865 Charles Sumner Republican Senator of Massachusetts stated that "The curse of slavery is still upon them. Someone must take them by hand; not to

support them but simply to help them to that work which will support them". Explaining their aide as not doing the work for them or working as them, but instead to help them be able to do that work. Which in itself is quite similar to the point that like the Sumner stance in aiding the Freedmen's Bureau, the simple factor of race does not do the work of deciding college admission but allows the college admissions staff to be able to do work with all the information that factors in college admissions. Directing back to education as important to the Freedmen bureau established The Charter for Howard University in Washington D.C named after the Commissioner of the Freedmen's Bureau, General Oliver Otis. The Establishment of the institution was quickly recognized although funding came almost exclusively from the Bureau. That changed after the Bureau was disbanded in 1879 so congress decided to give it financial aid between the years 1879 and 1910 till it was finally approved a special appropriation to receive federal funds even as a private

institution. Which in itself argues against the pettitioner side as the university still receives federal funding while other private schools do not receive funding it could in that way be argued to take away federal assistance from the college although it is quite evident that the government believed in the University's goal to seek ways to erase all vestiges of prejudice and discrimnation from American society and to repay the debt created by slavery, so wouldn't the use of race in colleges admisions for all Universitys such as UNC be accepatble in order so to gain diversity in the goal of creating equality in such a way that Howard University seeks it.

While it could be argued that the Freedmen's Bureau was successful in creating equality as it created many opportunities for Black Americans. Historical events such as the black wall street massacre have pushed back the progress for equality that was made by the Freedmen's Bureau. As for in the instance of the black wall street massacre hundreds of black americans were put back in

poverty as their houses were looted and their neighbors brutally murdered. Causing a higher imbalance both economically and racially as the attacks were targeted because of the color of their skin.

To continue I would like to address Diversity as touched upon in the much disputed case and the case up for question on being overturned, *Grutter V. Bollinger, 539 U.S. 306 (2003).* In *Grutter V Bollinger, 539 U.S. 306 (2003)* the school discusses its use of race as essential to "Assembling a class that is both exceptionally academically qualified and broadly diverse". With their main goals being to "Cross racial Understanding" to help break down racial stereotypes that would enable students "to better understand persons of different races." Many Stereotypes are created by the lack of diversity for example if someone is of a white or Asian background and has never met someone of a black background or hispanic background they could possibly believe any reasonable statement about that person is true. Which can also cause effects like the doll

experiment. The baby doll experiment took place in the 1940s and has been used in social science evidence in Cases such as *Brown V. Board of Education of Topeka, 347 U.S. 483 (1954)* to demonstrate how early and internalized racism can be. In the Test the psychiatrist showed children of different races from the age three to seven two identical dolls, except one was white and the other was black. They asked questions like "Which doll is bad" and then which doll is "ugly" the psychiatrist found alarming results that showed the black baby doll was most frequently labeled as the "the bad" and "Ugly" baby doll even by black children. A similar Test was run in 2006 and the results still came out almost identical. internalized racial injustice had not been remedied in more than 60 years, so then how are we to believe it is to have been substantially changed in less than 20. Although with the use of race in College admissions the Colleges are able to snatch away the presence of a specific race being attached to one thing and eliminate internalized racism by ensuring diversity. Which

is what the school in *Grutter V. Bollinger, 539 U.S. 306 (2003)* wanted to ensure. By ensuring diversity students are more likely to have a chance to interact with people of different races and rid themselves of any racial stereotypes through spending time with them. Which is an opportunity that the University of North Carolina also hopes to be able to provide their students of all backgrounds to rid any harmful stereotypes before they join the working class or go further into it. Thus Grutter V. Bollinger 539 U.S. 306 (2003) should not be overturned as the University demonstrated a compelling governmental interest by expanding their students' exposure through the use of race in college admissions.

The inclusion of diversity does not just help battle racial stereotypes by having exposure on the campus, but that exposure itself leads to exposure outside of it. There are 435 seats in the house of representatives as of 2022s election 23% percent of those seats are held by minorities. Although according to the 2021 census 37% of the US's

population are of a minority group. While a 14% difference may not seem like alot we must also take into account that the 14% is not just a number but instead people. 14% of the population is at risk of not being represented or in other words over 40 millions U.S citizens. This is without argue an issue but one of the main aides toward the lessening of that 14% is affirmative action. Affirmative action aides as it ensures that there is diversity in colleges. As of Dec 1. 2022 there is a total of 138 lawyers in the house of representatives, which is more than a fourth of the house. Schools such as Michigan Law and University of North Carolina's school of Law are the very stepping stones for politicians in the United States. for as stated in Grutter V. Bollinger "Universities and in particular law schools, represent a large number of our national leaders" Another way that the case Grutter V. Bollinger 539 U.S. 306 (2003) demonstrates a governmental compelling interest for diversity.If Race is not taken into effect it can be more difficult for the campus to obtain a diverse student body and

to get more minorities into office. Having minorities in leadership roles will not just make sure there are more aided and diverse issues discussed but also they will be in a place where they can enact change. A Study done by psychologists at the University of Washington found that 90 to 95 percent of people were affected by unconscious prejudice. Expanding the diversity of high in leadership places like the house of representatives that very well decide our future helps to battle any uncious prejudiced decisions that may be concluded and further aid minorities to the point where affirmative action may not be needed. Which all starts by ensuring the diversity of the campuses that put them there.

II. Part II

A. Affirmative action is constitutional if it has met strict scrutiny. When a court is determining whether an action by the government violates the Constitution, the Levels of Scrutiny is utilized. The three most common levels of scrutiny are rational basis, intermediate scrutiny, and strict scrutiny. Strict scrutiny is often applied when a plaintiff sues the government for discrimination. To pass strict scrutiny, the law must have furthered a compelling governmental interest and must have narrowly tailored the law to achieve that interest. There have been several legal precedents addressing the issue of using race as a factor in admission decisions. In the case of *Regents of University of California v. Bakke* 438 U.S. 265 (1978), the Medical School of the University of California at Davis ("UC Davis") created what they referred to as a "special admissions program" where applicants

who self-identified as a member of a "minority group" –were evaluated and admitted in a separate process. Through the following years, UC Davis increased its entering class size from fifty to one hundred with sixteen of its seats reserved for students admitted under this special program. The system of reserving a certain number of vacant places for a particular group is considered a quota. While a quota ensures that there will be a number of underrepresented minority students attending the school, there is another system referred to as a critical mass. It is defined that there will be a meaningful number or representation of minority students necessary to foster and promote educational benefits it was designed to produce. The main difference between a quota and a critical mass is that while a quota places a focus on having a specific number of underrepresented minority students to attend the school, a critical mass does

not necessarily have a goal number to meet or at a minimum. Instead, a critical mass will take careful evaluation of every applicant with race simply as another factor. When the case of Bakke was brought forth to the Supreme Court, Justice Powell rejected a quota system. Though, he did find that the attainment of a diverse student body is a constitutionally permissible goal. However, UC Davis's admissions process was not narrowly tailored to such a goal. A constitutionally permissible admissions system, Powell wrote, would take race into account as a "plus" factor in a particular applicant's file, while not insulating the individual from comparison with all other candidates for the available seats. Race can be taken into account as merely another factor when deciding if the applicant will be admitted because the purpose of the inclusion of the applicant's ethnic background is to further the diversity on campus, which does

demonstrate a compelling interest and therefore consistent with strict scrutiny. The Supreme Court produced six separate opinions for this case, none of which commanded a majority. Twenty-five years following the previously discussed case, the Supreme Court issued two concurrent opinions that further developed its jurisprudence in this area with *Gratz v. Bollinger* 539 U.S. 244 (2003) and *Grutter v. Bollinger* 539 U.S. 306 (2003), which will be referred to as *Gratz* and *Grutter* respectively. In the first case, The University of Michigan's College of Literature, Science, and the Arts ("LSA") used a process called a selection index where university officials awarded up to 150 points to candidates for a number of different factors. The scores in each section, including the automatic awarding of twenty points for certain ethnicities in the miscellaneous category, were then added up which led to an immediate admission decision. The court found that

LSA's admissions policy did not provide for individual consideration of candidates, and moreover, found that the automatic awarding of twenty points made the factor of race to have substantial weight on an applicant's admission decision. The primary issue of *Gratz* 539 U.S. 244 (2003) is not because of the use of race, but rather because it does not carefully consider the individual. In the case of Grutter, the court found that Michigan Law School's admissions process passed constitutional muster in its broad and holistic review of each candidate's credentials. The Court reiterated that to be narrowly tailored, a race-conscious admission process may not use a quota system; may consider race merely as a "plus" factor; and must be flexible enough to consider all pertinent elements of diversity. The Court further held that each applicant must be evaluated as an individual, that race or ethnicity should not be the sole defining

feature of his or her application. This is to mean that it is acceptable for an applicant's ethnicity to be an additional desired aspect; however, it should not be the entire reason as to why the applicant will receive admission. While the plaintiff in *Grutter* 539 U.S. 306 (2003) did argue that the Law School's plan was not narrowly tailored because race-neutral alternatives existed that could achieve the benefits of diversity, the Court disagreed and held that narrow tailoring does not require the exhaustion of every conceivable race-neutral alternative. The Court also held that the use of race in admissions must have a logical end point and identified two ways in which a university might accomplish this goal: by creating sunset provisions and conducting periodic reviews on the extent to which such policies remain necessary. In order to satisfy strict scrutiny, the University must first demonstrate that it has a compelling interest which makes its use of race

conscious admissions policy necessary in furthering the interest. The Supreme Court has recognized that pursuing the educational benefits that derive from student body diversity is a compelling interest that may support the use of race in admissions. It can be concluded that a university's decision to pursue the educational benefits of having a diverse student body is, in substantial measure, in accordance with academics which is enough to be reasoned and principled to be given judicial deference. A court may presume that the university is with good faith in choosing to pursue the educational benefits of diversity. UNC has met the burden of demonstrating that it has a compelling interest in pursuing educational benefits of diversity, including racial diversity. As a public university, UNC has an obligation to the people of North Carolina to create and sustain an environment of educational excellence and to foster mutually beneficial

interactions among students and faculty members who possess diverse backgrounds and varying perspectives. The University's mission is to teach a diverse community of students to become the next generation of leaders, and to accomplish this task, it must enroll and admit a diverse student body. Though, the Court has found no fault with a university's acknowledgement that, in some situations, an applicant's race may be a determinative factor.

B. Affirmative action does align with the fourteenth amendment.

The fourteenth amendment of the United States Constitution was written and ratified in the years that followed the abolishment of slavery along with two other amendments. With the original purpose of the fourteenth amendment being to extend the rights of a citizen that was once defined with the exclusion of slaves, now permitting

those rights upon formerly enslaved persons. Following the Emancipation Proclamation and the conclusion of the Civil War, there was a lingering concern as to how a segment of the population would be able to transfer from conditions of servitude to citizenship. There was a movement to pass federal legislation in order to provide assistance to newly freed slaves to successfully transform and enable them to fulfill the civic duties associated with citizenship. This was the reason for the formation of the Freedmen's Bureau. The Act of March 3, 1865 established the Freedmen's Bureau with the intent of providing temporary aid for the recently freedmen, war refugees, and destitute citizens. With similar intent, affirmative action was first created by Executive Order 10925 in nineteen sixty-one. It required that government employers must not discriminate on the basis of race, creed, color, or national origin against any employee or applicant. The purpose of implementing affirmative action was likely to reduce the division between people that was originally created from slavery which at

this time, still had effects on the lives of the descendants of the formerly enslaved persons. *Regents of the University of California v. Bakke* was the first case to address affirmative action directed at college admissions. While affirmative action was primarily started to end workplace segregation, the idea was later integrated by higher education institutions in their admission policies. In the case of *Regents of the University of California v. Bakke* 438 U.S. 265 (1978), the Medical School of the University of California at Davis ("UC Davis") created a "special admissions program" for applicants who self-identified as "economically and/or educationally disadvantaged" and later, as a member of a "minority group" –were evaluated and admitted in a separate process. With this program, UC Davis decided to increase its entering class size from fifty to one hundred while incorporating a quota system to ensure that there will be a certain number of minority students part of the admitted class. When brought forth to the Supreme Court, Justice Powell rejected a quota system.

Though, he did find that the attainment of a diverse student body is a constitutionally permissible goal. While using a quota system is unconstitutional, the attainment of a diverse student body through the use of race conscious admissions was constitutionally permissible. The original purpose of the fourteenth amendment, as well as the thirteenth and fifteenth amendments, which were written and ratified around the same time, were an attempt to recover from the effects that slavery had on the nation when the topic came to race and color. Therefore, permitting higher education institutions to incorporate ethnicity into their admission policies for a diverse class, is consistent with the fourteenth amendment in ensuring that an applicant will not be deprived of a right such as that of education, on the basis of race. Furthermore, UC Davis did demonstrate a compelling governmental interest which is attaining a diverse student body on the factor of race, which links to strict scrutiny included within the fourteenth amendment. During the years following the abolishment of

slavery, there were universities built for the purpose of providing a post-secondary education to those of African descent such as the construction of Howard University in the District of Columbia two years following the Civil War. While the intention stands to provide possibility for those of African descent and descendants of former slaves to obtain education, it was strictly a black college. It was in the Act of June 21, 1866 the charter for Howard University was established for the thirty-ninth Congress. The original idea for the act came from the First Congregational Society of Washington, which in the wake of the Civil War desired to set up a theological seminary to educate African American clergymen. Though education was now readily available to a group of people who received mistreatment for centuries, these people continued to be separated from other races. In *Brown v. Board of Education* 347 U.S. 483 (1954), a student of color was forced to attend a school for people of color that was much farther from home than the school for white children. This segregation on the basis of

color violated the Equal Protection Clause of the fourteenth amendment. The court did rule that the plaintiffs were being deprived of the equal protection of laws guaranteed in the fourteenth amendment. *Brown* 347 U.S. 483 (1954) discussed the topic of the inclusion of ethnic identities in education, specifically having a desired ethnic group in a school. The plaintiff in this case was ruled in favor of by the court and it was decided that race in education, as used in this case which excludes groups of people who have been oppressed, violated their rights to equal protection that was stated and supposed to be protected by the fourteenth amendment. In implementing affirmative action, its goal is to reduce the mystery surrounding multiple minority groups whose reputations were structured based on their history as servitude workers and to provide an opportunity for students who do not belong to a minority group to be educated upon the diverse ways people from different ethnicities and cultures lead their lives. In defending UNC's use of race conscious affirmative action, it must be

comprehended that the university is a public institution which seeks to produce talented leaders who also possess diverse experiences and backgrounds. UNC's affirmative action program has met strict scrutiny by demonstrating a compelling governmental interest and has it narrowly tailored to meet the second requirement of strict scrutiny. The intentions of the writers of the fourteenth amendment were to achieve racial justice and equality, and affirmative action is consistent with the fourteenth amendment of the United States Constitution.

CONCLUSION

To conclude, Michigan Law School in Grutter V. Bollinger has met strict scrutiny and demonstrated a compelling interest that is to attain a racially diverse student body which is consistent with the equal protection guaranteed within the fourteenth amendment, and thus the court should not overturn its initial rightful ruling. Furthermore, it should be held in favor of higher institutions using race as a factor in admissions as it is handled holistically to gain a critical mass, in order to obtain diversity and thus does not harm the rights of applicants.

Respectfully submitted,

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