No. 02-241

In the Supreme Court of the United States

BARBARA GRUTTER,

PETITIONER,

V.

LEE BOLLINGER, ET AL.,

RESPONDENTS.

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

BRIEF ON BEHALF OF HILLARY BROWNE, DANIELLE CONLEY, NADINE JONES FRANCIS, ROBIN KONRAD, AND THE STUDENTS OF HOWARD UNIVERSITY SCHOOL OF LAW AS *AMICI CURIAE* IN SUPPORT OF RESPONDENTS

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INTEREST OF *AMICI CURIAE*

The students of Howard University School of Law submit this brief as *amici curiae* in support of the University of Michigan Law School, urging this Honorable Court to affirm the Sixth Circuit's ruling that the University's race-conscious admissions program serves the compelling governmental interest of attaining a diverse student body and that its policy is narrowly tailored.[1]

Howard University School of Law opened its doors in 1869 with the goal of ensuring that any student, regardless of race, gender, or national origin, seeking a legal education would be afforded that opportunity. Our law school became a training ground where students, most notably Supreme Court Justice Thurgood Marshall, learned to affect the change necessary to realize the ideals of American democracy. These legal pioneers were instrumental in *Brown v. Board of Education*, 347 U.S. 483 (1954)—the landmark decision that ended *de jure* segregation in public schools and paved the way for a more inclusive society.

Nearly fifty years after *Brown*, Howard University School of Law continues its legacy of pursuing social justice and promoting diversity in the classroom and within the legal profession. As the nation's population becomes increasingly diverse,

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[1] This brief is submitted with the consent of the parties. Pursuant to Supreme Court Rule 37.6, counsel represent that this brief was not authored or paid for in whole or in part by counsel for any party. Petitioners and respondents have filed with the Clerk letters granting blanket consent to any party filing an *amicus* brief in support of either petitioner or respondent.

we recognize the importance of being able to work in a multicultural society and the centrality of diversity to law schools' roles in setting the American educational and social agenda, particularly as it affects underrepresented communities. While the student population at Howard University School of Law is primarily composed of people of color, each of us has previously had significant exposure to the majority, whether through the undergraduate institutions that we attended,[2] the neighborhoods in which we were raised, or simply as a function of being minorities in America. Howard University School of Law students have a direct stake in the outcome of this case and respectfully request that this Honorable Court find that the University of Michigan Law School's race-conscious admissions program serves a compelling governmental interest and is narrowly tailored to fulfill that interest.[3]

SUMMARY OF ARGUMENT

The Sixth Circuit correctly held that the University of Michigan Law School's race-conscious admissions program is a constitutionally permissible means of attaining a racially diverse student body,

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[2] In the entering class of 2002, 71.24% of Howard University School of Law students attended predominantly white universities.

[3] Although we believe that the University of Michigan Law School's admissions policy is narrowly tailored, this brief will focus primarily on why the Law School's use of a race-conscious admissions program to obtain a racially and ethnically diverse student body is a sufficiently compelling interest to satisfy strict scrutiny.

and the program is narrowly tailored to achieve that interest. A university's consideration of race in an effort to create diversity in the classroom is one of the special circumstances in which racial classifications are constitutionally permissible. Diversity is a compelling governmental interest because it furthers the goal of societal integration articulated in *Brown* and provides students who lived in racial isolation prior to entering college with the opportunity to interact with students of different races. In addition, diversity in the law school classroom fosters an environment in which misconceptions regarding race can be challenged and dispelled. When law students are exposed to a variety of perspectives, they are better prepared to relate to and empathize with racially and culturally diverse clients. Diversity also promotes harmonious relationships between minority and non-minority attorneys, which will likely improve minority retention in the public and private sectors. Finally, racial diversity is a compelling governmental interest because race-neutral alternatives do not achieve the goal of assembling a student body that will accurately reflect the increasing diversity of the United States.

ARGUMENT

I. THE UNIVERSITY OF MICHIGAN LAW SCHOOL'S CONSIDERATION OF RACE IN ITS ADMISSIONS PROGRAM TO ACHIEVE A DIVERSE STUDENT BODY IS A COMPELLING GOVERNMENTAL INTEREST.

The use of racial classifications is constitutionally permissible in special circumstances. A university's use of racial classifications to create a diverse student body is one such circumstance. *See Regents of the Univ. of Cal. v. Bakke*, 438 U.S. 265, 311-12 (1978);[4] *see also Smith v. Univ. of Wash. Law Sch.*, 233 F.3d 1188, 1197 (9th Cir. 2002); Mike Allen, *Rice: Race Can Be Used As a Factor in Admissions*, Wash. Post, Jan. 18, 2003, at A1 (quoting Condoleezza Rice's assertion that there are circumstances when "it is appropriate to use race as one factor among others in achieving a diverse student body"). Announcing the judgment of the Court in *Bakke*, Justice Powell determined that educational diversity is a constitutionally compelling interest, which permits a university to consider race

[4] Five Justices concluded that a university's consideration of race is constitutional, albeit for different reasons. Justice Powell concluded that the goal of achieving a diverse student body is sufficiently compelling to justify consideration of race in admissions decisions, while Justices Brennan, Marshall, Blackmun, and White concluded that "[the] purpose of remedying the effects of past societal discrimination is…sufficiently important to justify the use of race-conscious admissions program." *Bakke*, 438 U.S. at 362.

as a factor "in attaining the goal of a heterogeneous student body." *Bakke*, 438 U.S. at 314.

Opponents of racial classifications in both remedial and non-remedial settings rely on the notion of a color-blind Constitution as support for the proposition that discrimination on the basis of race, whether invidious or benign, is constitutionally impermissible. *See Plessy v. Ferguson*, 163 U.S. 537, 559 (1896) (Harlan, J., dissenting) (asserting that the "Constitution is color-blind, and neither knows nor tolerates classes among citizens"); *see also* U.S. Const. amend. XIV, § 1. The notion that the government should *never* be allowed to consider race, however, ignores not only the history and original intent behind the enactment of the Fourteenth Amendment,[5] but also the current realities of racial segregation, discrimination, and racial disparities in education and the workplace. As noted by Justice O'Connor, "[t]he unhappy persistence of both practice and the lingering effects of racial

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[5]The Fourteenth Amendment, and specifically the Equal Protection Clause, was originally enacted to protect newly freed slaves from the "hostile legislation of the States" after the Civil War. *Slaughter-House Cases*, 83 U.S. (1 Wall.) 36, 55 (1872). Although the protection afforded to individuals under the Equal Protection Clause is no longer limited to "discrete and insular minorities," *United States v. Carolene Products Co.*, 304 U.S. 144, 152-53 n.4 (1938), the Court will undermine the clause's original purpose should it adopt a color-blind approach. As noted by Justice Marshall, "[W]e are not all yet equals, in large part because of the refusal of the *Plessy* Court to adopt the principle of colorblindness. It would be the cruelest of irony for this court to adopt the dissent in *Plessy* and now hold that the University must use color-blind admissions." Memorandum from Thurgood Marshall, to Conference, April 13, 1978, Brennan Papers, Box 465, at 2-3.

discrimination against minority groups in this country is an unfortunate reality, and the government is not disqualified from acting in response to it." *Adarand Constructors, Inc. v. Pena*, 515 U.S. 200, 237 (1995). Although Justice O'Connor refers to the use of racial classifications that are remedial in nature, her assertion dispels the idea of a Constitution that sees no color and supports the proposition that there should be special circumstances in which a state actor can constitutionally consider race. *See Wygant v. Jackson Bd. of Educ.*, 476 U.S. 267, 286 (1986) (O'Connor, J., concurring) (noting that "a state interest in the promotion of diversity has been found sufficiently 'compelling', at least in the context of higher education, to support the use of racial classifications in furthering that interest").

The University of Michigan Law School's race-conscious admissions program is a constitutional means to obtain the benefits that flow from a racially and ethnically diverse student body. In *Bakke*, Justice Powell recognized that the "robust exchange of ideas" that will inevitably result from a diverse student body will benefit both minority and non-minority students. 438 U.S. at 312. Following this "diversity rationale," the majority of the nation's colleges and universities have employed race-conscious admissions programs to promote interaction, familiarity, and mutual understanding between students of different races and ethnicities in an effort to "prepar[e] [students] for participation as a political equal in a pluralist democracy." Akhil Reed Amar & Neal Kumar Katyal, *Bakke's Fate*, 43 UCLA L. Rev. 1745, 1774 (1996). Although racial classifications by their very nature raise concerns of

constitutional fairness and equality, in the context of education such classifications are a constitutionally permissible method for universities and colleges to best prepare their students to live comfortably and work efficiently in a racially diverse country.

In considering the race of its students when selecting its entering class, the University of Michigan Law School not only promotes and encourages societal integration, but also provides the nation's future leaders with the opportunity to learn how to work effectively in a country that is becoming increasingly multicultural. The University of Michigan Law School's ultimate goal of creating a racially diverse environment in which law students can consider and appreciate a variety of perspectives is constitutionally compelling because of the positive impact that such an environment will have on both minority and non-minority law students in the classroom and when they ultimately enter the profession. When law students are exposed to a variety of perspectives and viewpoints before entering the public or private sector, they are better equipped to advocate for and empathize with their clients.

II. THE UNIVERSITY OF MICHIGAN LAW SCHOOL'S CONSIDERATION OF RACE TO ACHIEVE STUDENT DIVERSITY FURTHERS *BROWN*'S GOALS OF SOCIETAL INTEGRATION, AND RACIALLY DIVERSE CLASSROOMS FOSTER AN ENVIRONMENT FOR STUDENTS TO CHALLENGE THEIR MISCONCEPTIONS ABOUT RACE.

Through constitutional efforts to ensure a racially diverse student body, the University of Michigan Law School and many other institutions of higher learning have successfully achieved the goals envisioned by the *Brown* Court and subsequent desegregation orders. In abolishing *de jure* segregation in public schools, the *Brown* Court was concerned not only with the inherent inequality of maintaining separate educational facilities for black and white children, but also with the educational benefits that could ultimately be derived through interracial interactions in the classroom. *See generally* 347 U.S. at 494 (noting that segregation deprives black children "of some of the benefits they would receive in a racial[ly] integrated school system").

Despite the Court's landmark decision in *Brown* and laws that were enacted as a direct result of the Civil Rights Movement, racial segregation in public education, housing, and other social domains remains an unfortunate reality.[6] These problems

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[6] *See* Goodwin Liu, *Affirmative Action in Higher Education: The Diversity Rationale and the Compelling Interest Test*, 33 Harv. C.R.-C.L. L. Rev. 381, 420 (1998); *see also* Expert Report of

have kept schools, neighborhoods, and the nation as a whole segregated, notwithstanding judicial and legislative efforts to the contrary. Consequently, this segregation has impacted primary and secondary education and prevented both minorities and non-minorities from receiving the benefits that flow from exposure to a diversity of perspectives. The use of a race-conscious admissions program by the University of Michigan Law School is necessary to provide the opportunity for the robust exchange of ideas that occurs in a racially diverse educational setting.

A. Justice Powell's Diversity Rationale in *Bakke* Is a Continuation of the Ideals Inherent in *Brown*.

One of the primary reasons that Justice Powell determined that a university could constitutionally consider race in an effort to obtain a diverse student body was because of the positive effect that such an environment would have on the nation as a whole. He asserted that "the nation's future depends on leaders trained through wide exposure to the ideas and mores of students as diverse as this Nation of

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Thomas J. Sugrue, *Gratz v. Bollinger*, No. 97-75321 (E.D. Mich.) & *Grutter v. Bollinger*, No. 97-75928 (E.D. Mich.), *in The Compelling Need for Diversity in Higher Education* [hereinafter Sugrue Report], *available at* http://www.umich.edu/~urel/admissions/legal/expert (noting that the "vast majority of White primary and secondary school students have no significant contact with Black, Hispanic, or American Indian students in the classroom"); Institute of Medicine, *Unequal Treatment: Confronting Racial and Ethnic Disparities in Health Care* 73-80 (Brian D. Smedley et al. eds., 2002) (pre-publication copy).

many peoples." *Bakke*, 438 U.S. at 313 (citations omitted). Justice Powell's diversity rationale encompasses the principle underlying the Court's rationale in *Brown* and its progeny? that the "robust exchange of ideas" resulting from interaction between students of different races in the classroom is essential to a quality education and will ultimately help "to prepare students to live in a pluralistic society." *Swann v. Charlotte-Mecklenburg*, 402 U.S. 1, 16 (1971); *see also Columbus Bd. of Educ. v. Penick*, 443 U.S. 449, 486 n.5 (1979) (Powell, J., dissenting) ("[I]t is essential that diverse peoples of our country learn to live in harmony and mutual respect. This end is furthered when young people attend schools with diverse student bodies."). Through the implementation of race-conscious admissions programs, schools such as the University of Michigan Law School achieve the benefits of racial diversity compelled by *Brown* and re-articulated by Justice Powell in *Bakke*.

Interaction between students of different races and ethnicities is often severely limited prior to their matriculation into college. After almost fifty years since this Court's decision in *Brown*, "whites and minorities seldom live in the same neighborhoods." Sugrue Report, *supra* note 6, at 3. While this decision effectively precluded government-sponsored segregation, individuals who are resistant to change have found ways to circumvent the principles of *Brown* by choosing to continue to live in racial isolation. As this Court noted in *Freeman v. Pitts*, 503 U.S. 467, 495 (1992), the Constitution cannot effectively address the re-segregation that has occurred as a result of private choice. *See also id*. at 502 (Scalia, J., concurring) (noting that most people

prefer "to reside near people of [their] own race or ethnic background"). Forced integration at the primary and secondary school levels may have ended state-enforced segregation in public schools, but it has not prevented Americans from segregating themselves. *See Penick*, 443 U.S. at 485 (Powell, J., dissenting) (stating that "compulsory integration [has resulted in]...a substantial exodus of whites from the system"). However, when selective institutions of higher learning employ race-conscious admissions programs they can successfully bring students of all races and ethnicities together in the classroom, breaking the pattern of racial isolation. Thus, a university's use of race to achieve a diverse student body is not a concept that is new to the courts. The "diversity rationale" is merely a continuation of the ideals inherent in *Brown* and its progeny.

B. A Racially Diverse Student Body Allows Law Students to Challenge Racial Stereotypes, Fosters Harmonious Relationships Among Students of Different Races, and Encourages Students to Examine the Law From Different Perspectives.

Through race-conscious admissions programs, universities encourage students from different walks of life to challenge their ideas about race that result from being raised in a segregated society.[7] In

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[7] *See* Expert Report of Patricia Y. Gurin, *Gratz v. Bollinger*, No. 97-75321 (E.D. Mich.) & *Grutter v. Bollinger*, No. 97-75928 (E.D. Mich.), *in The Compelling Need for Diversity in Higher*

discussing the consequences of racial and ethnic divisions in the public educational system, expert Thomas Sugrue noted that racial homogeneity in the classroom "allows stereotypes and myths to flourish, because the students lack direct evidence to contradict their erroneous impressions." Sugrue Report, *supra* note 6, at 3. Therefore, it is imperative that institutions of higher learning, at the undergraduate and the professional level, assemble a racially heterogeneous student body to provide both minority and non-minority students with the opportunity to interact with students of various racial and ethnic backgrounds and the opportunity to challenge their beliefs about race. College students bring with them the racial stereotypes that they have learned; upon graduation, "they will take those same assumptions, misconceptions and knowledge gaps into the domain of public decision making, *unless our colleges and universities make deliberate efforts to foster racially diverse learning environments*." Liu, *supra* note 6, at 422 (emphasis added). It is important for institutions of higher learning to create an educational environment that promotes cultural awareness and understanding to "provide students with opportunities to bridge the racial gaps that continue to divide our nation." *Id*. The University of Michigan Law School's use of race in its admissions program is not discrimination to right a past wrong, but instead functions as a method to help students

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Education [hereinafter Gurin Report], *available at* http://www.umich.edu/~urel/admissions/legal/expert (noting that most students that attend the University of Michigan and other selective universities come from schools and neighborhoods that are largely segregated).

acknowledge and heal the wounds created by centuries of racial separation and cultural misunderstandings, which continue today.

In acknowledging that racial and ethnic diversity in educational settings is "essential to the quality of higher education," Justice Powell rightly stressed that the entire nation benefits from students who are widely exposed to a myriad of ideas and perspectives. *Bakke*, 428 U.S. at 312. This is certainly true in the context of legal education. Administrators at law schools across the country have recognized the benefits that result from a racially diverse student body. Lee Bollinger, the former dean at the University of Michigan Law School, has determined that "[h]aving a racially diverse class enables a law school to do a better job of preparing students to be effective lawyers." Lee Bollinger, *Seven Myths About Affirmative Action in Higher Education*, 38 Willamette L. Rev. 535, 541 (2002).

Several studies have demonstrated that the benefits of racial diversity are concrete, not conjectural or hypothetical.[8] For example,

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[8] *See generally* William Bowen & Derek Bok, *The Shape of the River* 218-25 (1998) (indicating that for more than 150 years, educational experts have stressed the educational value of diversity in higher education); Ann Springer, American Association of University Professors, *Update on Affirmative Action in Higher Education*: *A Current Legal Overview*, *at* http://www.aaup.org/Issues/AffirmativeAction/aalegal.htm (updated Jan. 2003) (presenting evidence that the benefits of diversity are not merely anecdotal).

[9] *See* Bowen & Bok, *supra* note 8, at 267; *see also* Roland Garcia, *Strength Through Diversity*, The Houston Lawyer, Mar. 2002, *available at* http://www.thehoustonlawyer.com/aa_mar02/aa_presi/presi.htm ("Students who are exposed to

Alexander Astin and Mitchell Chang have found that student exposure to racial diversity in the classroom has a positive impact on the way in which students view race. *See* Mitchell J. Chang, *Does Racial Diversity Matter?: The Educational Impact of a Racially Diverse Undergraduate Population*, 40 J. College Student Dev. 391 (1999); Alexander W. Astin, *Diversity and Multiculturalism on the Campus: How Are Students Affected,* Change, Mar.-Apr. 1993, at 44. These studies and others have determined that racial and ethnic diversity in the classroom increases cultural understanding, encourages students to think critically, and fosters harmonious relationships between students of different races and ethnicities.[9]

In addition to the studies conducted by experts in the educational arena and the professional opinions of legal scholars, professors, and administrators at the nation's most selective law schools, the Supreme Court has also acknowledged the importance of a diverse law school environment to the legal

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people with diverse backgrounds and ideas become better critical thinkers, and show greater social and interpersonal development."); Lani Guinier, *Colleges Should Take 'Confirmative Action' in Admissions*, The Chronicle Review, Dec. 14, 2001, at B10 (Lee Bollinger, quoted in the article, proposed that "people learn more and learn better in an environment where they are part of a mix of people where there are substantial differences, with people not like themselves." Bollinger also noted that "understanding race in America is a powerful metaphor for crossing sensibilities of all kinds.").

profession. In *Sweatt v. Painter*, 339 U.S. 629 (1950), the pre-*Brown* Court ruled that the University of Texas Law School was required to admit black students, stressing the importance and educational value of racial diversity. The Court stressed that a "law school … cannot be effective in isolation from individuals and institutions with which the law interacts. Few students and no one who has practiced law would choose to study in an academic vacuum, removed from the interplay of idea and exchange of views with which the law is concerned." *Id*. at 634; *see also McLaurin v. Okla. State Regents for Higher Educ.*, 339 U.S. 637, 641 (1950) (determining that the University of Oklahoma's restrictions on black students' use of school facilities did not allow them to receive an effective education because of their inability "to engage in discussions and exchange views with other students").

Racial diversity in the classroom not only fosters an environment of racial understanding, but also challenges the misconception that racial discrimination is no longer an issue in the United States. *See* Liu, *supra* note 6, at 434. Such an understanding is imperative to law students because "the law is not an abstract concept removed from the society it serves," but should be used as a tool to "narrow the gap between the ideal of equal justice and the reality of social inequality." Sandra Day O'Connor, *Thurgood Marshall: The Influence of a Raconteur*, 44 Stan. L. Rev. 1217, 1218 (1992). A racially diverse law school environment forces students to confront the role that race plays within the legal system, and the ways in which people from various racial and ethnic backgrounds have been

affected by the laws and by those who enforce them. *See* Roscoe J. Howard, Jr., *Getting it Wrong:* Hopwood v. Texas *and Its Implications for Racial Diversity in Legal Education and Practice*, 31 New Eng. L. Rev. 831, 877-78 (1997). The elimination of race-conscious admissions programs will significantly decrease the opportunity of white students to gain insight into the way many people of color perceive the legal system, which will inevitably affect the way in which such students assess the realities of racism and its relationship to the law. "[R]epresentation of minority members who have suffered injustices at the hands of our legal system" not only will enrich classroom discussion, but also will provide law students with opportunities to view the laws "through the eyes of those with a different perspective." *Id*. at 877.

A powerful example of the importance of racial diversity in the legal profession is the role of racial diversity on the Supreme Court. In a tribute to Justice Marshall, Justice O'Connor discussed how Justice Marshall's position on the Court allowed her to gain insight into the plight of people who encounter racial discrimination on a continuous basis. *See* O'Connor, *supra*, at 1219. Acknowledging the benefits of diversity, she noted: "Although all of us come to the Court with our own personal histories and experiences, Justice Marshall brought a *special perspective*...." *Id*. at 1217 (emphasis added). Justice O'Connor stressed the importance and the validity of diverse viewpoints on the Court, noting that Justice Marshall's stories constantly reminded her that "the law is not an abstract concept removed from the society it serves" and that such stories could possibly "change the way [she] see[s] the

world." *Id*. at 1220. For the very same reasons, it is critical to the success of law students that they are exposed to a variety of viewpoints that are often shaped by an individual's race? for those viewpoints can change the way in which students view the law and perhaps, like Justice O'Connor, change the way in which they see the world.[10] *See id*.

III. THE UNIVERSITY OF MICHIGAN LAW SCHOOL'S CONSIDERATION OF RACE IN ITS ADMISSIONS PROGRAM ADVANCES EFFECTIVE CLIENT REPRESENTATION BY ENSURING THAT FUTURE ATTORNEYS ARE EXPOSED TO A VARIETY OF PERSPECTIVES PRIOR TO ENTERING THE WORK FORCE.

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[10]Opponents of race-conscious admissions programs subscribe to the notion that using race as a factor in admissions is stereotypical and relies on "the crude, and dangerous proxy of race for ideological diversity." *Johnson v. Bd. of Regents of the Univ. of Ga*, 106 F. Supp.2d 1362, 1374 (S.D. Ga. 2000). Although it is not our contention that there is a monolithic Black community, or simply one "minority viewpoint," it is not a fiction that a person's race often affects his or her perspectives on a variety of issues. *See* Expert Report of William Bowen, *Gratz v. Bollinger*, No. 97-75321 (E.D. Mich.) & *Grutter v. Bollinger*, No. 97-75928 (E.D. Mich.), *in The Compelling Need for Diversity in Higher Education* [hereinafter Bowen Report], *available at* http://www.umich.edu/~urel/admissions/legal/expert; *see also* Mike Allen, *Rice: Race Can Be Used As a Factor in Admissions*, Wash. Post, Jan. 18, 2003, at A1 (Condoleezza Rice noted that "[i]t's hard to talk about life experiences or the experiences of an individual without recognizing that race is a part of that.").

The absence of significant numbers of minorities in law schools adversely affects the practice of law by reducing attorneys' ability to effectively represent their clients. Without an opportunity to interact with people of different races and ethnicities in the classroom, possible misconceptions and assumptions about race can carry over into the workplace and thus prevent a client from receiving truly effective counsel.

According to Census Bureau projections, by the year 2050, people of color will comprise more than 45% of the United States' population.[11] Despite these projections, minority representation in the legal profession is not growing at rates similar to that of the population.[12] In addition, law school enrollment among minorities, which had steadily

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[11] U.S. Bureau of the Census, Current Population Reports, *Population Projections of the United States by Age, Sex, Race and Hispanic Origin: 1995 to 2050*, *at* http://landview.census.gov/prod/1/pop/p25-1130/ (Report P25-1130, 1996). The African American population will likely number in excess of 61 million, nearly double its size in 1995. By 2010, the Census Bureau projects that the Hispanic American population will be the second largest ethnic group in the country, and after 2020, the Hispanic population is projected to add more people to the U.S. population than all other ethnic groups combined. *Id*.

[12] Elizabeth Chambliss, American Bar Association, *Miles to Go 2000: Progress of Minorities in the Legal Profession*, 1 (2000). In 1990, only 7.6% of all lawyers were from racial and ethnic minorities: 3.4% African American, 2.5% Hispanic, 1.4% Asian American and 0.2% Native American. Subsequent data indicates that between 1990-1998 African American and Hispanic representation in the profession increased by a mere 0.5%, and similar gains are attributed to Asian Americans and Native Americans, indicating an increase in minority representation to 10% of the legal community. *Id*.

grown for many years, has stagnated since *Hopwood v. Texas*, 78 F.3d 932 (1996), where the Fifth Circuit determined that the University of Texas Law School could not consider an applicant's race to achieve a diverse student body.[13]

As students at Howard University School of Law, we recognize that "[a] lawyer is a representative of clients, an officer of the legal system, and a public citizen having special responsibility for the quality of justice." *Model Rules of Prof'l Conduct*, Pmbl. (1999). As such, lawyers have the principal duty to zealously and effectively represent their clients' interests by recognizing and understanding their clients' needs. The importance of client empathy and cross-cultural understanding has been widely recognized.[14] While the micro benefit to cultural understanding is the ability to "improve representation of clients," the

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[13] *See generally* Jorge Chapa & Vincent A. Lazaro, *Hopwood in Texas: The Untimely End of Affirmative Action in Chilling Admission: The Affirmative Action Crisis and the Search for Alternatives* 55 (Gary Orfield & Edward Miller eds., 1998) (showing decline in minority enrollment in Texas law schools after *Hopwood*).

[14] *See generally* Susan Bryant, *The Five Habits: Building Cross-Cultural Competence in Lawyers*, 8 Clinical L. Rev. 33 (2001) (Director of Clinical Education and Associate Professor of Law at CUNY asserting the reasons necessary for cross-cultural training); Michelle S. Jacobs, *People From the Footnotes: The Missing Element in Client-Centered Counseling*, 27 Golden Gate U. L. Rev. 345 (1997) (Professor at University of Florida College of Law arguing that an attorney's ability to effectively represent her client often hinges on her ability to consider and address cultural or racial impediments); Marjorie A. Silver, *Emotional Competence, Multicultural Lawyering and Race*, 3 Fla. Coastal L.J. 219 (2002) (Associate Professor of Law at Touro College Law Center noting that racial and cultural awareness is critical to effective representation).

macro benefit is to ultimately "help build a more just legal system." Bryant, *supra* note 14, at 36.

As students at a historically Black law school, we have a special interest in the University of Michigan Law School's race-conscious admissions program, which takes the initial steps needed to ensure that both minority and non-minority attorneys can productively interact with each other and with diverse clients. The University of Michigan Law School's consideration of race to create a diverse student body fosters and promotes the idea of cross-cultural competence—namely, the ability to understand and interact with those from different racial, ethnic, and cultural backgrounds. T.K. Bikson & S.A. Law, RAND, *Global Preparedness and Human Resources: College and Corporate Perspectives* 26-28 (1994). To maintain the integrity of the legal profession, it is critical that attorneys have exposure to different cultural perspectives prior to entering the workplace.

A. A Law School's Consideration of Race in Its Admissions Program Promotes Fair Representation of Clients Within the Public Legal Sector, Maintains Client Confidence, and Strengthens Public Notions of Fairness.

Race-conscious admissions programs help to preserve public confidence in the legal system by producing future lawyers who are able to relate to an increasingly diverse society. Consistent with notions of effective client representation and cultural understanding, the United States Department of Justice ("DOJ") maintains that "[d]iversity in the

administration of justice is vital to the faith and trust the American people have in their legal system."[15] Deputy Attorney General Larry Thompson has stated that "the [DOJ] must build and retain an attorney work force that ... appropriately reflects the diversity of our society." *DOJ Announces Contract*, *supra* note 15. Over the past several years, the DOJ has implemented programs that enhance diversity in the workplace to improve citizen confidence in the judicial system.

In June 2000, former Attorney General Janet Reno established an Eight-Point Plan to Enhance Diversity "to ensure that individuals from all diverse groups in our society can participate to the fullest degree in employment and advancement opportunities in the Department." Memorandum from Attorney General Janet Reno, For Heads of Department Components and For All United States Attorneys (June 16, 2000), *at* http://www.usdoj.gov/jmd/eeos/8PTPLAN.PDF. Within its definition of diversity, the DOJ includes, among other things, "persons of different races, colors, ethnic backgrounds, [and] national origins." *Id*. at 1, n.2. Three years after Reno's Eight-Point Plan was implemented, the need for diversity is still an issue. Because of the DOJ's commitment to "maintain[ ] a qualified and diverse work force to enhance the *integrity and performance* of the Justice Department," Attorney General John Ashcroft has

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[15] *Department of Justice Announces Contract Award for Analysis of Diversity in Its Attorney Workforce*, Jan. 16, 2002 [hereinafter *DOJ Announces Contract*] (United States Attorney General John Ashcroft emphasizing the need for diversity), *at* http://www.usdoj.gov/opa/pr/2002/January/02_ag_015.htm (last visited Jan. 19, 2003).

employed a consulting firm to evaluate problems and make recommendations to improve the DOJ's diversity. *DOJ Announces Contract*, *supra* note 15 (emphasis added).

One significant duty with which the DOJ is charged is monitoring our nation's criminal justice system. Unlike civil defendants, the personal freedom of criminal defendants is at stake. For this reason, the need for effective client representation and fairness within the criminal justice system is even more profound. Unfortunately, the reality is that "[r]acial disparities appear at virtually every point in the criminal justice system" and these disparities reflect the disparate social and economic conditions that exist beyond the criminal justice system. David Cole, *No Equal Justice* 139 (1999).

It is fundamental that attorneys who are part of the public sector are culturally competent to ensure fairness and justice. The students at Howard University School of Law seek to uphold a legal system that promotes justice for minorities in accordance with our school mission. We recognize that this cannot occur without a cultural understanding of clients. The use of race-conscious admissions programs in law schools helps to assure that the fundamental rights of people in America are not compromised by attorneys who have no cultural understanding of their clients.

B. Without Significant Exposure to Racially and Ethnically Diverse People, Leading Law Firms and Corporations Will Retain Attorneys Who Are Ill-Equipped to Effectively Serve Their Clients in Today's Global Economy.

Through the policies adopted by leading American law firms, it is evident that diversity is not simply welcomed, but is necessary for success within a business institution. In fact, the top firms have made statements of commitment to diversity within their institutions.[16] Successful law firms are aware that, if they fail to promote an environment receptive to racial diversity and fail to hire attorneys who are cross-culturally competent, they will have difficulty successfully competing in society, both in representing their clients and in retaining quality lawyers.

Similarly, corporations have discovered the benefits of diversity to both their work environments and their profit margins. As a result, by 1995, nearly half of all U.S. employers had established some type of diversity program. *See* American

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[16] *See, e.g.*, Cravath, Swaine & Moore, Our People, *at* http://www.cravath.com (last visited Jan. 19, 2003) (noting that "over 25 percent [of summer associates] were from minority groups"); Wachtell, Lipton, Rosen & Katz, Minority Recruitment, *at* http://www.wlrk.com/WLRK/Recruiting.cfm?ID=24 (last visited Jan. 16, 2003) (indicating that the "firm is committed to recruiting a diverse and talented body of lawyers"); Sullivan & Cromwell, *at* http://www.sullcrom.com/display.asp?section_id=91 (last visited Jan. 16, 2003) (naming ethnicity as one of several indications of the firm's diverse attorney base); Skadden Arps, Hiring Process, *at* http://www.skadden.com/recruiting/attorneys_hiring_main.html (last visited Jan. 16, 2003) (seeking attorneys "from diverse racial, religious and ethnic backgrounds"); Davis Polk & Wardwell, Our Lawyers, *at* http://www.dpw.com/recruiting/ourlawyers.htm (last visited Jan. 19, 2003) (announcing the award for the "second-highest overall diversity among the 250 largest U.S. firms" in conjunction with a commitment to diversity).

Management Association, *Managing Cultural Diversity* (Jan.1995), *at* http://www.amanet.org/research/archives.htm. Polls of top executives at Fortune 500 companies have shown that management views diversity as an important part of business.[17] For example, Ford Motor Company recognizes the revenue potential of marginalized groups and has developed a new diversity advisory council so that it can accurately reflect population trends and remain competitive, and ensure that all of its employees are cross-culturally competent. *See* K. Terrell Reed, *Ford Bets on Black, Automaker is Hoping to Capitalize on African American Spending*, Black Enterprise (July 2002).

For those law school graduates who pursue a career with a law firm or a corporation, either as in-house counsel or in some other capacity, prior experience interacting with individuals from as many backgrounds and with as varied experiences as possible will be a key component to their success. The University of Michigan Law School's implementation of a race-conscious admissions program ensures that a greater number of future employees will experience this exchange of ideas prior to entering the work force.

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[17] Society for Human Resource Management (SHRM), *Fortune 500 Firms Outpace the Competition with Greater Commitment to Diversity*, (reporting the positive results of SHRM Survey of Diversity Programs), *at* http://www.shrm.org/press/releases/980803.htm (last visited Jan. 19, 2003). Additionally, Dupont President and CEO, John A. Krol remarked, "Diversity in our company is itself a business imperative vital to our ongoing renewal and our competitiveness into the 21st century." Steven A. Ramirez, *Diversity and the Boardroom*, 6 Stan. J.L. Bus. & Fin. 85, 86 n.3 (2000) (quoting John A. Krol) (citations omitted).

C. In the Absence of Race-Conscious Admissions Programs, Minorities in the Legal Profession Will Enter an Unwelcoming, Unfamiliar, and Potentially Hostile Work Environment That Will Likely Result in Low Retention Rates.

Many students at Howard University School of Law will enter the legal profession in an environment where the majority of our peers are white lawyers who have attended predominantly white law schools.[18] Minorities who enter the legal profession often face barriers that are a direct result of racial stereotypes and misunderstandings by their non-minority co-workers. While most large firms have expressed a commitment to diversity, those same firms have difficulty retaining attorneys from racially diverse backgrounds. The high attrition rate among minority attorneys at law firms presents yet another reason that law schools have an interest in assuring a racially diverse student body.

A recent article examining the minority retention rates at Cleary, Gottlieb, Steen & Hamilton, a prominent New York law firm, found that most former African American associates felt that they experienced "subtly different expectations, opportunities, and treatment" in comparison to their white counterparts. Alan Jenkins, *Losing the Race*, Am. Lawyer (Oct. 4, 2001). In addition, these

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[18] According to Howard University School of Law, Office of Career Services, 43.7% of graduates from 2001 and 45.3% of graduates from 2000 entered into private practice. (Statistics on file at Howard University School of Law, Office of Career Services).

associates described how they were perceived to be incompetent, [19] which was reflected in the distribution of work assignments. *Id*.

The experience of African American associates at Cleary Gottlieb underscores the value of a diverse learning environment as a way for all law students to overcome misconceptions and assumptions about each other. In the absence of such race-conscious admissions programs, many students will not have the opportunity to challenge certain attitudes and stereotypes that are formed and hardened by isolation from the realities of racism in American society. Because 86% of associates and 96.1% of partners at top law firms are white,[20] it is inevitable that graduates of Howard University School of Law working in top firms will interact professionally with white graduates from majority white law schools. For this reason, we have an interest in ensuring that interaction in the workplace is not the first time that our colleagues at firms have been exposed to people of color.

The University of Michigan Law School's use of a race-conscious admissions program provides an

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[19] Between one-half and three-quarters of white Americans believe that African Americans are less intelligent than whites and other minorities. *See* Institute of Medicine, *supra* note 6, at 9.

[20] Brian Zabcik, *Diversity Scorecard: Measuring Up (And Down*), Minority L.J. (Spring 2002), *available at* http://www.minoritylawjournal.com/spring02/texts/measuring.html. The breakdown within minority percentages of associates was: 6.9% Asian Americans; 4.1% African Americans; 2.8% Hispanic; and 0.2% Native Americans. The breakdown within minority percentages of partners was: 1.3% Asian Americans; 1.4% African Americans; 1.2% Hispanics; and 0.1% Native Americans.

opportunity for discussions about race, and its role in the law and in society. The students at Howard University School of Law believe that the use of race-conscious admissions programs positively impacts the practice of law by providing a forum in which diversity is a natural component of legal education. All students have the opportunity to become cross-culturally competent when they are immersed in a racially and ethnically diverse learning environment. Graduates will bring this cross-cultural competence into the workplace, allowing them to be more productive, efficient, and comfortable in their surroundings and enabling them to more effectively advocate for their clients.[21]

IV. RACE-CONSCIOUS ADMISSIONS PROGRAMS ARE EFFECTIVE IN ACHIEVING STUDENT DIVERSITY, AND RACE-NEUTRAL ALTERNATIVES SUCH AS SOCIOECONOMIC STATUS AND PERCENTAGE PLAN PROGRAMS PRODUCE INADEQAUTE RESULTS.

The University of Michigan Law School's race-conscious admissions program is narrowly tailored to achieve a diverse student body, and there are no race-neutral alternatives that will achieve the same result. Although the consideration of race is not the only manner in which diverse perspectives can be

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[21] "Our society—indeed our world—is and will continue to be multi-racial. We simply must learn to work more effectively and more sensitively with individuals of other races, and a diverse student body can make a profound and direct contribution to the achievement of this end." *See* Bowen Report, *supra* note 10, at 1.

obtained, using race ensures the greatest variety of backgrounds and viewpoints, which ultimately improves the educational atmosphere in universities.[22] The University of Michigan Law School has implemented race-neutral alternatives in the past, but these practices failed to produce a racially diverse student body as envisioned by the University. Without a race-conscious admissions program in place at the University of Michigan Law School, its student body will lack the diversity that is needed to create a robust exchange of ideas in the law school classroom.

Race-neutral alternatives, such as the consideration of socioeconomic status or percentage plan programs, are not as successful as race-conscious admissions programs in ensuring racial diversity in universities. If the University of Michigan Law School were to rely on socioeconomic status without considering race, the number of minority students admitted under such a program

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[22] *See* Bollinger, *supra,* at 540-41 ("[E]thnic and racial diversity within a university setting is absolutely essential to the accomplishment of a university's missions, and is at the very core of what a university does…."); *see also Grutter*, 288 F.3d at 739 ("The evidence defendants submitted…demonstrated that the educational atmosphere at the law school is improved by the presence of students who represent the greatest possible variety of backgrounds and viewpoints.") (citing *Grutter v. Bollinger*, 137 F. Supp. 2d 821, 849 (E.D. Mich. 2001)); Bowen Report, *supra* note 10 (noting that evidence demonstrates that race-neutral alternatives for achieving a diverse student body, such as the consideration of socioeconomic status, are not "likely to be as effective as race-sensitive admissions in enrolling an academically well prepared and diverse student body").

would not create a racially diverse class.[23] Similarly, percentage programs like those supported by President Bush are not only ineffective in achieving racial diversity at the undergraduate level,[24] but also inapplicable at the professional and graduate levels. Furthermore, the success of the percentage plans depends on the continued segregation of high schools, which is contrary to the mandate of *Brown*. Under percentage plans, a diverse student body within universities cannot be attained unless there are high schools that remain almost exclusively African American or Hispanic American to guarantee that minorities rank within the established percentile. Race-neutral solutions are ineffective methods for the University of Michigan

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[23] *See* Bowen & Bok, *supra* note 8, at 51:

> While it is true that [African American and Hispanic] students are much more likely than white students to come from families of low socioeconomic status, there are almost six times as many white students as [African American and Hispanic] students who come from low-SES families and have test scores that are above the threshold for gaining admission to an academically selective college or university. Even if it were financially possible to admit substantially more low-income applicants, the number of minority students would be affected only marginally.

[24] Despite their race neutrality, such plans do not consider the strength of the high school but instead take students from weaker schools who lack preparation to excel academically. Such programs "fall short of addressing the inadequate preparation of students at primary and secondary levels" and are setting minority students up for educational failure. *See* National Association for College Admission and Counseling Issue Paper: Affirmative Action in College Admission (Summer 2001), *available at* http://www.nacac.com/downloads/affirmativeactionissuepaper.pdf.

Law School to achieve the compelling interest of a diverse student body; thus the University is left with only one viable alternative ? using race as one of many factors considered in its admissions process.

Because race plays an integral role in shaping the law and continues to permeate every aspect of our society, the University of Michigan Law School's interest in obtaining a diverse student body is sufficiently compelling to justify the consideration of race. As noted by Lee Bollinger, "where [else] will these different paths of society come into contact so they can learn from one another ... if not in our system of public and private higher education? Race still matters." Bollinger, *supra*, at 539.

If law schools are prohibited from considering race in their admissions programs, minority enrollment will significantly decrease, thereby deteriorating the core values of racial integration underlying *Brown*. Consequently, students will be deprived of a culturally rich pedagogical environment that will allow them to confront legal issues that are critical to our multiracial society.

CONCLUSION

For the foregoing reasons, the decision of the Sixth Circuit should be affirmed.

Respectfully submitted,

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APPENDIX

INTERESTED PARTIES*

***Roberta Herbert, Records Specialist, certifies that the following undersigned students are currently registered at Howard University School of Law.**

Abdur-Rahman, Isa
Abrams, Lisa M.
Adekeye, Akinbowale O.
Ainman, Rachel
Alexander, Kebran
Allen, Shay
Altifois, Leander
Andrews, Diara
Anyan, Samuel A.
Asfaha, Semira
Ashby, Hazeen
Aziz, Abdul Razak
Baarez, Nebiat
Bannister, Adonna J
Bawa, Jasbir
Bea, Stefany L.
Benjamin, Chaka
Bennett-Brynt, Melissa
Best, Dalila
Best, David
Bigby, Marsden
Black, Dion
Black, Alesia
Blake, Erica
Blake, Hanna L.
Blaeuer, Maria E.
Bonner, Michael V. F.
Boyd, Nashiba F.
Bradley, Erica
Braithwaite, Joel
Brooks, Ayana
Brooks, Nisha N.
Brown, Wanda D.
Brown, Turkessa L.
Browne, Hillary
Brumskine, Charles
Burchell, Kelly
Burguillo, Malibea
Burton, Cassandra
Byars, Joanne
Cain, Brandi
Caldwell, Raquel
Camacho, Karina
Campbell, Omolola
Campbell, Micala
Campbell, Rwanda
Cantave, Gabrielle
Carraway, Rasheeda
Carter, Brandi
Castillo, Luis
Cauley, Clay
Chaney, Vernida
Chapman, Kenya
Chauhan, Reetu
Christophe, Cliff
Christian, Morenike
Clarke, Kwasi
Clunie, David G.
Cole, Sharon
Coleman, William
Coleman, Charles
Coleman, Kenyon C.

Coley, Simone
Collins, David A.
Conley, Danielle
Cook, Andrea
Crenshaw, Adrienne
Crowder, Terrica
Cummings, Louise
Cureton, Donald
Daniel, Jennifer
Daniels, Sherell D
Dash, Kwesi Ako
Davis, Kendrah L.
Davis, Ben
Denman, Darrian
Deskins, Marska
Dillard David
Dinkins, Brandee A.
Dixon, Ayesha J.
Doggett, Kai
Dubuche, Christian Yves
Dyton-White, Rayna
Early, Delmont
Evans, Carlos
Evans, Geordana M.
Exceus, Juderns
Fagan, Trevor
Fanfair, Jermaine
Fleming, Stephanie
Flythe, Michelle
Ford, Yaifa Oni
Foxx, Marcus T.
Francis, Genelle
Francis, Ruth
Frazier, April
Fresh, C.M.
Fryson, Nicole
Gadsden, Gibran
Gant, Asina
Gasper, Joseph T.
Gee, Kimberlee
Gibson, Richard
Gillissen, Jeremy
Gilmore, Sharon
Goff, Norvel
Gough, Kathleen S.
Gowens, Alyssa
Grant, Jason
Graves, Carmiece
Green, Michael J.
Greene, Everett
Greene, Annette
Gross, Melanie K.
Gulstone, Ronan
Handi, Alina
Hall, Margaux
Hall, Alexis
Hall, Preston R.
Hamilton, Ph.D., Alexander
Hankerson, Corey
Hardy, Chanelle
Hare, Jennifer
Harley, Heturah Denise
Harris, Natasha
Harris, Michelle R.
Hedman, Alexis E.
Henderson, Da'Net J.
Henley, Kevin
Henry, Jamar
Hicks, Minisha C.
Hinish, Lorn
Holland, Angela
Holingsworth, Scott
Holloman, Roderick J.
Holmes, Matthew
Hortman, LaMar
Horton, Lenore
Howard, Millard
Hussein, Yitzhak
Jackson, Greg
Jean Baptiste, Diane
Jenkins, Nicole M.
John, Nicolette

Johnson, Marcy
Johnson, Margaret
Johnson, Jeanine
Johnson, Devin
Johnson, Andrea E.
Johnson, Andre N.
Jones, Brandy
Jones, Tamika
Jones, Karen L.
Jones, Ellaretha
Jones, Jana Anita
Jones-Francis, Nadine
Jones-Wright, Genevieve
Jones, Rashida, S.
Jordan, Ponzo
Jordan, Tracy
Joseph, Omar
Kamara, Kamal
Kasarabada, Ramesh
Kendrick, Lindsay N.
Kessler, David
King, Sojourner
King, Patrick
Messiah, Lucericia
Kirwan, D. Antoinette
Konrad, Robin
Kubrom, Samuel
Kyle, James
Langford, Sarah-Elizabeth
Layne, Janelle
Leathers, Marshall
Ledet, Lenus
Leeks, Janelle
Lewis, Fasha
Lewis, Nicole
Llewellyn, Stacy Ann N.
Lloyd, Otisha
Long, Rhonda
Lynch, Cory J.
Mack, Shona
Maddox, Jason
Manns, Ryan
Manson, John
Marshall, Amina
Martin, Christopher M.
Martin, Khaalis
Mason, Azura
Mavunda, Rita
McCallum, Howard
McCaskill, William
McCollum, James
McCormick, Corlie
McDonald, Nia
McEachin, Oujil
Mckee, Sharmil
Mckenzie, Terri
Mclaren, Tamara
McNeil, Arthur L.
Mehta, Tarun
Milfort, Job P.
Mirchandani, Reshma
Mitchell, Sabrina
Montgomery, Jacquelene
Montgomery, Addrana R.
Moody, Delanissa
Morgan, Caesar
Morgan, Tamara
Morris, Ernest
Morris, D'Asia M.
Morrow, Conley
Moss, Yvonne
Muhammad, Ifraj
Muhammad, Jamal Sadat
Murrain, Jelani
Murray, Tiffany
Muse, Kristopher
Ndiaye, Carina
Neal, Denita
Needham II, C. Anthony
Nelson, Veronica
Nguyen, Tram
Nichols, Kenneth J.

Nnabuithe, Obiageli
Nwabuzor, Nkechinyem
Oduah, Chinwe
Okeke, Ben
Okoroegbe, Christopher
Oliver, Aisha
Onyejekwe, Sylvia
Osborne, Sara
Otum, Peggy
Owens, W. Lanelle
Palmer, Kahlill
Parker, Ara
Parker, Kimberly
Partee, Ayana
Patcha, Kevin
Patel, Devanshi
Patterson, Brandon
Pettie, Jason
Phillips, Willie
Pierre-louis, Barbara
Pitre, Marques
Pittman, James
Plummer, Andrene
Porter, Marwan
Prater, Ulani D.
Price, Albert
Quinn, Teri Janine
Quiring, Stephanie
Ramson, Angela
Raja, Zahid
Rey, Marquex
Reyes, Alejandro
Richards, John C.
Roberts, Rhina
Robinson, Danielle
Robinson, Eric
Robinson, Kito B.
Robinson, Tiffany
Romond, Joseph A.
Roshell, Alicia A.
Rluse, Patrice
Rouzan, Don
Royer, Dara
Samuel, Marlene
Santagati, Anthony
Saunders, John F.
Scott, Dana
Shasanmi, John
Shaw, La' Keabian
Shaw, Lani P.
Shipp, Jaron
Shuman, Will
Simmons, Errick D.
Simmons, Derrick T.
Simmons, Tameka Nachelle
Simms, Jonathan
Sizemore, Tiffany
Smith, Nicole P.
Smith, Tiffany
Smith, Anya
Smith, Shavon J.
Sneed, Stephanie
Starks, Marquis
Stevens, Tasha Marie
Stevens, Stephanie A.
Stewart, Larry
Stokes, Deidre
Stovall, Kristal Lyn
Strickland, Yaisa
Suber, Reiko
Tate, Nicholos
Tate, Brian
Tate, Richard
Terry, Stacey
Terry, Robin C.
Thomas, Willie
Thompson, Elan
Thompson, Ericka
Todd, Karen
Toller, Sharla
Townsend, Meghan M.
Travis,Torrino Travell

Tsybine, Alex
Turner, Allison R.
Ulit, Ithti Toy
Velez, John
Venable, Allen W.
Venning, Catina
Waite, Elizabeth
Walker, Christoper
Walker, Jennifer
Walters, Luis N.
Ward, Natalie A.
Ware, Vivian Y.
Watson, Shofaetiyah
Webb, Danielle
West, Nyasha
West, Rasheedah
White, Raquel
White, Janelle M.
Williams, Desiree
Williams, Tarshima
Williams, Jamal
Williams, Breyuna L.
Williams, Charlene
Williams, Devon
Williams, Aisha
Williams, Lora A.
Willie, Tiakyta
Wilson, C. T.
Wollensack, Rebecca
Woodard, Mia
Woodrick, Kerri
Woods, Scott
Woods, Chenita
Wortham, Nekesha
Wrenn, Khaliah M.
Wright, Allie M.
Yankey, Michelle
Yates, Natasha A.
Yates, Jarrunis