

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 RACHEL TUDOR,)
)
 Plaintiff-Intervenor)
)
 v.)
)
 SOUTHEASTERN OKLAHOMA)
 STATE UNIVERSITY, and)
)
 THE REGIONAL UNIVERSITY)
 SYSTEM OF OKLAHOMA)
)
 Defendants.)

Case No. CIV-15-324-C

**ANSWER OF DEFENDANT REGIONAL UNIVERSITY SYSTEM
OF OKLAHOMA TO INTERVENOR PLAINTIFF’S COUNT ONE**

Defendant, Regional University System of Oklahoma, (“RUSO”), for its answer to Count I of Plaintiff/Intervenor’s Complaint in Intervention (“Complaint”), admits Plaintiff’s allegations contained in the Complaint only to the extent specifically set forth below. To the extent any matters are not explicitly admitted, they are denied. RUSO adopts and incorporates each and every allegation and affirmative defense contained in its Answer to Plaintiff/Intervenor’s Complaint [Doc. 29]. Defendant RUSO provides its Answer to Count I as follows¹:

¹ Paragraphs are numbered to correlate with the Intervenor Complaint paragraph to which it responds.

130. In response to Paragraph 130, RUSO adopts and realleges its responses to Paragraphs 1-129 of Plaintiff/Intervenor's Complaint.

131. RUSO denies the allegations in Paragraph 131, and further states that while employed at Southeastern Oklahoma State University ("SOSU"), Dr. Tudor did not submit any complaint or grievance of any type of harassment or bullying from SOSU or others.

132. RUSO denies the allegations in Paragraph 132.

133. RUSO is without sufficient knowledge or information to admit or deny the allegations in Paragraph 133.

134. RUSO denies the allegations in Paragraph 134.

135. RUSO denies the allegations in Paragraph 135.

136. RUSO denies the allegations in Paragraph 136.

137. RUSO denies the allegations in Paragraph 137.

138. RUSO denies the allegations in Paragraph 138.

139. RUSO admits the allegations in Paragraph 139.

140. Paragraph 140 states a legal conclusion, and therefore does not require a response from RUSO. Further, RUSO denies that Dean Scoufos took any unlawful actions regarding Dr. Tudor.

141. RUSO denies that Dean Scoufos took the alleged actions regarding Dr. Tudor. The remaining allegations in Paragraph 141 state a legal conclusion, and therefore do not require a response from RUSO.

142. The allegations in Paragraph 142 state a legal conclusion, and therefore do not require a response from RUSO. Further, RUSO denies that Vice President McMillan took any unlawful actions regarding Dr. Tudor.

143. The allegations in Paragraph 143 state a legal conclusion, and therefore do not require a response from RUSO. Further, RUSO denies that Vice President McMillan took any unlawful actions regarding Dr. Tudor.

144. RUSO denies the allegations in Paragraph 144.

145. RUSO denies the allegations in Paragraph 145.

146. Defendant admits all faculty and staff of Oklahoma regional universities, including SOSU, are provided a health insurance plan; Defendant admits the plan contained more than four pages of numerous exclusions, which included an exclusion for transsexual surgery or any treatment leading to or in connection with transsexual surgery; Dr. Tudor never submitted any type of complaint or request regarding her insurance coverage. Defendant denies the remaining allegations in Paragraph 146.

147. RUSO denies the allegations in Paragraph 147.

148. RUSO denies the allegations in Paragraph 148.

149. RUSO denies the allegations in Paragraph 149.
150. RUSO denies the allegations in Paragraph 150.
151. RUSO denies the allegations in Paragraph 151.
152. RUSO denies the allegations in Paragraph 152.
153. RUSO denies the allegations in Paragraph 153.
154. RUSO denies the allegations in Paragraph 154.
155. RUSO denies the allegations in Paragraph 155.
156. RUSO denies the allegations in Paragraph 156.
157. RUSO denies the allegations in Paragraph 157.
158. RUSO denies the allegations in Paragraph 158.
159. RUSO denies the allegations in Paragraph 159.

/s/ Dixie L. Coffey

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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of July, 2015, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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