

**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 SOUTHEASTERN OKLAHOMA STATE
UNIVERSITY TO INTERVENOR PLAINTIFF’S COUNT ONE**

Defendant, Southeastern Oklahoma State University, (“SOSU”), 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. SOSU adopts and incorporates each and every allegation and affirmative defense contained in its Answer to Plaintiff/Intervenor’s Complaint [Doc. 28]. Defendant SOSU provides its Answer to Count I as follows¹:

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

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

131. SOSU denies the allegations in Paragraph 131, and further states that while employed at SOSU, Dr. Tudor did not submit any complaint or grievance of any type of harassment or bullying from SOSU or others.

132. SOSU denies the allegations in Paragraph 132.

133. SOSU is without sufficient knowledge or information to admit or deny the allegations in Paragraph 133, and therefore denies the same.

134. SOSU denies the allegations in Paragraph 134.

135. SOSU denies the allegations in Paragraph 135.

136. SOSU denies the allegations in Paragraph 136.

137. SOSU denies the allegations in Paragraph 137.

138. SOSU denies the allegations in Paragraph 138.

139. SOSU admits the allegations in Paragraph 139.

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

141. SOSU 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 SOSU.

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

144. SOSU denies the allegations in Paragraph 144.

145. SOSU 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. SOSU denies the allegations in Paragraph 147.

148. SOSU denies the allegations in Paragraph 148.

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

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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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