

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

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff	)	
	)	
RACHEL TUDOR,	)	
	)	
Plaintiff-Intervenor	)	
v.	)	CASE NO. 5:15-CV-00324-C
	)	
SOUTHEASTERN OKLAHOMA	)	
STATE UNIVERSITY, and	)	
	)	
THE REGIONAL UNIVERSITY	)	
SYSTEM OF OKLAHOMA,	)	
	)	
Defendants.	)	

**JOINT MOTION TO EXTEND DEADLINES TO FILE RESPONSE BRIEFS IN  
OPPOSITION TO PARTIES’ MOTIONS TO COMPEL**

Pursuant to Local Rule 7.1, Plaintiff United States of America (“United States”) and Defendants Southeastern Oklahoma State University (“Southeastern”) and the Regional University System of Oklahoma (“RUSO”) (collectively “Defendants”) respectfully request that the Court extend by one week the deadline for Plaintiff to file its response brief in opposition to Defendant RUSO’s’ Motion to Compel Discovery Responses and the deadline for Defendants to file their response brief in opposition to Plaintiff’s Motion to Compel Deposition Testimony of Charles Babb and for Sanctions. The Plaintiff-Intervenor does not oppose this motion.

RUSO filed its Motion to Compel Discovery Responses on June 23, 2016. ECF No. 67. The United States filed its Motion to Compel Deposition Testimony of Charles

Babb and for Sanctions on June 24, 2016. ECF No. 68. Pursuant to Local Rule 7.1(i), the United States' response brief in opposition to Defendant RUSO's motion to compel is currently due July 14, 2016 and RUSO's response brief in opposition to Plaintiff's motion to compel is currently due July 15, 2016. The United States requests that the Court extend the deadline for the filing of both response briefs by one week. The requested extension would require the United States to file its response brief by July 21 and RUSO to file its response brief by July 22. This is the first time the Parties have requested an extension of these deadlines and the extension would not affect any other deadlines in the case.

The Parties request this extension because counsel for the United States must obtain a declaration from its agency head regarding the assertion of deliberative process privilege in support of its response brief. This process may be further slowed by the Independence Day holiday, which falls prior to the current deadlines. Also, all counsel also are busy preparing for four depositions in this case scheduled to occur on July 19, 20, and 21, 2016, as well as addressing various other discovery issues in this case.

For the foregoing reasons, the Parties respectfully request that the Court enter the order filed with this Motion.

Respectfully submitted,

Date: July 6, 2016

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**CERTIFICATE OF SERVICE**

I certify that I served this document on all counsel of record through the Court's electronic filing system on the date below.

Date: July 6, 2016

/s/ Valerie L. Meyer

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SYSTEM OF OKLAHOMA,	)	
	)	
Defendants.	)	

**[PROPOSED] ORDER**

Without objection, the Joint Motion to Extend Deadlines to File Response Briefs in Opposition to Parties’ Motions to Compel (ECF No. 69) is GRANTED. The United States may file its response brief in opposition to Defendant RUSO’s motion to compel (ECF No. 67) on or before July 21, 2016. The Defendants may file their response brief in opposition to Plaintiff’s motion to compel (ECF No. 68) on or before July 22, 2016.

Dated this \_\_ day of July, 2016.

\_\_\_\_\_  
ROBIN J. CAUTHRON  
United States District Judge