

**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 three business days 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. Counsel for the United States and Defendants agreed verbally to these extensions on July 20, 2016.

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. The United States' response brief in opposition to Defendant RUSO's motion to compel is currently due July 21, 2016 and RUSO's response brief in opposition to Plaintiff's motion to compel is currently due July 22, 2016. The United States requests that the Court extend the deadline for the filing of both response briefs by three business days. The requested extension would require the United States to file its response brief by July 26 and RUSO to file its response brief by July 27. This would be the second time the Court has extended these deadlines but 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 and the EEOC's agency head regarding the assertion of deliberative process privilege in support of its response brief. This process has taken longer than initially anticipated. Also, counsel for the United States and Defendants are busy conducting four depositions this week 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 21, 2016

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/s/ Allan K. Townsend

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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 21, 2016

/s/ Allan K. Townsend

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THE REGIONAL UNIVERSITY	)	
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. 72) 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 26, 2016. The Defendants may file their response brief in opposition to Plaintiff’s motion to compel (ECF No. 68) on or before July 27, 2016.

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

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