

**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.)	

UNITED STATES’ WITNESS LIST

Pursuant to the Court’s scheduling order (ECF No. 57) and Fed. R. Civ. P. 26(a)(3)(A), the United States submits its witness list for trial. In addition to the witnesses below, the United States reserves the right to call any witnesses on the Defendants’ and/or Plaintiff/Intervenor’s witness lists. The United States reserves the right to call witnesses not on this list for purposes of rebuttal. The United States also reserves the right to amend this witness list since discovery is ongoing (for example, four depositions are scheduled during the week of August 22-26, 2016).

Expect to Call	Name	Address and Telephone Number, if known	Proposed Testimony
	Paula Smith Allen	Witness is a current faculty member at Southeastern and can be contacted at her work address and phone number.	Witness's testimony would be expected to include, but not be limited to, Dr. Tudor's qualifications for promotion and tenure, Southeastern's process for evaluating applications for promotion and tenure, and Southeastern's process for considering Dr. Tudor's application for tenure and promotion to Associate Professor.
	Daniel Althoff	Witness is a current faculty member at Southeastern and can be contacted at his work address and phone number.	Witness's testimony would be expected to include, but not be limited to, Dr. Tudor's qualifications for promotion and tenure and Southeastern's process for evaluating applications for promotion and tenure.
	Teresa Anderson	Unknown	Witness's testimony would be expected to include, but not be limited to, the information that the witness provided in a recommendation letter that Dr. Tudor included in her portfolio for promotion and tenure.
X	Charles Babb	Witness is General Counsel to the Regional University System of Oklahoma and can be contacted at his work address and phone number.	Witness's testimony is expected to include, but not be limited to, information regarding Southeastern and RUSO policies as applied to Dr. Tudor, discussions he had with various other RUSO and SEOSU personnel, and the new policy developed during Dr. Tudor's grievance process during the 2010-2011 school year.
	Janet Barker	Witness is a current	Witness's testimony would be

		faculty member at Southeastern and can be contacted at her work address and phone number.	expected to include, but not be limited to, information regarding her qualifications for tenure and promotion to Associate Professor, Dr. Tudor's qualifications for tenure and promotion to Associate Professor, and Southeastern's process for evaluating applications for promotion and tenure.
X	Dr. George R. Brown	549 Miller Hollow Road Bluff City, Tennessee 37618-4103	Expert witness who is expected to testify on the matters addressed in his report.
X	Bryon Clark	736 Webb Smith Rd. Sherman, TX 75090	Witness's testimony is expected to include, but not be limited to, information regarding Dr. Tudor's grievance of the decision not to let her apply for promotion and tenure during the 2010-11 academic year and information regarding Southeastern's process for evaluating applications for promotion and tenure.
X	Lisa Coleman	Witness is a current faculty member at Southeastern and can be contacted at her work address and phone number.	Witness's testimony is expected to include, but not be limited to, Dr. Tudor's qualifications for promotion and tenure, Southeastern's process for evaluating applications for promotion and tenure, and Southeastern's process for considering Dr. Tudor's application for tenure and promotion to Associate Professor.
X	Cathy Conway	3043 Quail Ridge Cir. Durant, Oklahoma	Witness's testimony is expected to include, but not be limited to, conversations that Ms. Conway had with Dr.

			Tudor and other employees of Southeastern regarding Dr. Tudor's gender transition.
X	Margaret Cotter-Lynch	Witness is a current faculty member at Southeastern and can be contacted at her work address and phone number.	Witness's testimony is expected to include, but not be limited to, Dr. Tudor's qualifications for promotion and tenure; Southeastern's process for evaluating applications for promotion and tenure; and the effects that Defendants discrimination had on Dr. Tudor.
	Corie Delashaw	Witness is a current faculty member at Southeastern and can be contacted at her work address and phone number.	Witness's testimony would be expected to include, but not be limited to, Dr. Tudor's qualifications for promotion and tenure.
X	William Fridley	Witness is a current faculty member at Southeastern and can be contacted at his work address and phone number.	Witness's testimony is expected to include, but not be limited to: activities and records of the Faculty Senate; activities and records of the Faculty Senate's Personnel Policies Committee; and application and interpretation of Southeastern and RUSO policies.
X	Charla Hall	Witness is a current faculty member at Southeastern and can be contacted at her work address and phone number.	Witness's testimony is expected to include, but not be limited to, information related to grievances that Dr. Tudor filed in connection with her efforts to obtain tenure and promotion to Associate Professor and information regarding Southeastern's process for evaluating applications for promotion and tenure.
	Melinda House	3105 Butlan Circle Durant, OK 74701	Witness's testimony would be expected to include, but not be

		580-230-8231	limited to, information related to Southeastern administrators' treatment of and interactions with Dr. Tudor.
	James Knapp	Witness is a current faculty member at Southeastern and can be contacted at his work address and phone number.	Witness's testimony is expected to include, but not be limited to, information related to grievances that Dr. Tudor filed in connection with her efforts to obtain tenure and promotion to Associate Professor and information regarding Southeastern's process for evaluating applications for promotion and tenure.
	Jana Legako	Unknown	Witness's testimony would be expected to include, but not be limited to, her communications with Dr. Stubblefield in connection with Dr. Stubblefield's investigation of Dr. Tudor's discrimination complaints.
	Kim McGehee	Witness is a current faculty member at Southeastern and can be contacted at her work address and phone number.	Witness's testimony would be expected to include, but not be limited to, Dr. Tudor's qualifications for promotion and tenure and information regarding Southeastern's process for evaluating applications for promotion and tenure.
X	Douglas McMillan	See deposition transcript which is not yet available	Witness's testimony is expected to include, but not be limited to, the reasons for decisions that Southeastern made in connection with Dr. Tudor's application for tenure and promotion to Associate Professor during the 2009-10 academic year; her attempted application for tenure and

			promotion to Associate Professor during the 2010-11 academic year; actions Southeastern took regarding Dr. Tudor when she went through her gender transition; and Southeastern's process for evaluating applications for promotion and tenure.
	Jane McMillan	Unknown	Witness's testimony would be expected to include, but not be limited to, information about Douglas McMillan's beliefs about transgender people.
X	Larry Minks	3450 N. Commerce Street, No. 707 Ardmore, OK 73401	Witness's testimony is expected to include, but not be limited to, information about Dr. Tudor's application for tenure and promotion to Associate Professor during the 2009-10 academic year, her attempted application for tenure and promotion to Associate Professor during the 2010-11 academic year, and Southeastern's process for evaluating applications for promotion and tenure.
X	John Mischo	Witness is a current faculty member at Southeastern and can be contacted at his work address and phone number.	Witness's testimony is expected to include, but not be limited to, Dr. Tudor's qualifications for promotion and tenure; Southeastern's process for evaluating applications for promotion and tenure; and Southeastern's process for considering Dr. Tudor's application for tenure and promotion to Associate Professor.
	Richard Ogden	Oklahoma County Courthouse, 321 Park Avenue, Rm. 115,	Witness's testimony would be expected to include, but not be limited to, information about

		Oklahoma City, OK 73102	Defendants' internal investigations of Dr. Tudor's discrimination complaints and grievances.
X	Dr. Robert Dale Parker	Department of English University of Illinois 608 S. Wright Street Urbana, Illinois 61801	Expert witness who is expected to testify on the matters addressed in his report.
X	Virginia Parrish	P.O. Box 577 Durant, OK 74702-0577 (580) 380-1383	Witness's testimony is expected to include, but not be limited to, Dr. Tudor's qualifications for promotion and tenure, Southeastern's process for evaluating applications for promotion and tenure, and Southeastern's process for considering Dr. Tudor's application for tenure and promotion to Associate Professor.
	Larry Prather	Witness is a current faculty member at Southeastern and can be contacted at his work address and phone number.	Witness's testimony would be expected to include, but not be limited to, information related to grievances that Dr. Tudor filed in connection with her efforts to obtain tenure and promotion to Associate Professor and information regarding Southeastern's process for evaluating applications for promotion and tenure.
X	Randy Prus	Witness is a current faculty member at Southeastern and can be contacted at his work address and phone number.	Witness's testimony is expected to include, but not be limited to, Dr. Tudor's qualifications for promotion and tenure; Southeastern's process for evaluating applications for promotion and tenure; Southeastern's process for considering Dr. Tudor's

			application for tenure and promotion to Associate Professor; and facts related to Southeastern's decision not to let Dr. Tudor apply for tenure and promotion during the 2010-11 academic year.
X	Sharon Robinson	1516 North 12th Avenue, Durant, Oklahoma 74701	Witness's testimony is expected to include, but not be limited to, information regarding Southeastern's response to Dr. Tudor's gender transition.
	Lisa Schroeder	Current faculty member at Southwestern Oklahoma State University (SWOSU)	Witness's testimony would be expected to include, but not be limited to, the fact that she was permitted to apply for promotion and tenure again after the President of SWOSU denied her application.
X	Lucretia Scoufos	1200 W. Morton Street, Denison, Texas	Witness's testimony is expected to include, but not be limited to, the reasons for decisions that Southeastern made in connection with Dr. Tudor's application for tenure and promotion to Associate Professor during the 2009-10 academic year and her attempted application for tenure and promotion to Associate Professor during the 2010-11 academic year and information regarding Southeastern's process for evaluating applications for promotion and tenure.
X	Jesse Snowden	1200 W. Morton Street Denison, Texas	Witness's testimony is expected to include, but not be limited to, Defendants' treatment of other professors during their promotion and tenure application processes.

	Blake Sonobe	Unknown	Witness's testimony would be expected to include, but not be limited to, information regarding Drs. Lisa Schroeder, Anthony Stein, and Curt Woolever applying for promotion and tenure again after the President of Southwestern Oklahoma State University denied their applications.
X	Mark Spencer	Witness is a current faculty member at Southeastern and can be contacted at his work address and phone number.	Witness's testimony is expected to include, but not be limited to, Dr. Tudor's qualifications for promotion and tenure; Southeastern's process for evaluating applications for promotion and tenure; how Defendants treated him when he applied for promotion and tenure; and Southeastern's process for considering Dr. Tudor's application for tenure and promotion to Associate Professor.
	Anthony Stein	Current faculty member at Southwestern Oklahoma State University (SWOSU)	Witness's testimony would be expected to include, but not be limited to, the fact that he was permitted to apply for promotion and tenure again after the President of SWOSU denied his application.
X	Claire (Gilmore) Stubblefield	830 Franklin Drive Ardmore, OK 73401	Witness's testimony is expected to include, but not be limited to, how the Defendants responded to Dr. Tudor's discrimination and retaliation complaints.
X	Rachel Tudor	Witness may be contacted through her counsel.	Witness will testify about the discrimination/retaliation she experienced at Southeastern and the damages she suffered

			as a result.
X	Ross Walkup	Witness is a current member of Southeastern's administration and can be contacted at his work address and phone number.	Witness's testimony is expected to include, but not be limited to, the reasons why Defendants refused to accept Dr. Tudor's application for tenure and promotion to Associate Professor during the 2010-11 academic year, and information regarding Southeastern's process for evaluating applications for promotion and tenure.
X	Charles Weiner	1517 W. Elm Durant, Oklahoma	Witness's testimony is expected to include, but not be limited to, the Defendants' tenure and promotion policies; Defendants' response to a grievance that Dr. Tudor filed; Defendants' decision not to accept Dr. Tudor's application for tenure and promotion to Associate Professor during the 2010-11 academic year; and information regarding Southeastern's process for evaluating applications for promotion and tenure.
	Curt Woolever	Unknown	Witness's testimony would be expected to include, but not be limited to, the fact that he was permitted to apply for promotion and tenure again after the President of SWOSU denied his application.

Respectfully submitted,

Date: August 19, 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: August 19, 2016

/s/ Allan K. Townsend