

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

UNITED STATES OF AMERICA,

Plaintiff,

RACHEL TUDOR,

Plaintiff-Intervenor,

v.

Case No. CIV-15-324-C

SOUTHEASTERN OKLAHOMA STATE
UNIVERSITY, and

THE REGIONAL UNIVERSITY SYSTEM
OF OKLAHOMA,

Defendants.

**DEFENDANTS SOUTHEASTERN OKLAHOMA STATE UNIVERSITY AND
THE REGIONAL UNIVERSITY SYSTEM OF OKLAHOMA'S
FINAL EXHIBIT LIST**

Defendants Southeastern Oklahoma State University ("SEOSU") and Regional University of Oklahoma ("RUSO"), pursuant to the Court's Scheduling Order [Doc. 57] submit the following Final Exhibit List:

EXHIBIT LISTS

NO.	DOCUMENT
1	Memorandum from Doug McMillan to Rachel Tudor dated 10/5/2012 RE: Application for Tenure (DEF27)
2	Memorandum from Doug McMillan to Charla Hall and Bryon Clark dated 10/19/2010 RE: Tudor Grievance (DEF28-31)(Plaintiff's Depo Exhibit #129)

3	Notice of Appeal to Lawrence Minks dated 2/26/2010 (DEF1754-1456)(Plaintiff's Depo Exhibit #46)
4	Administration's Response to Notice of Appeal dated 4/29/2010 (DEF35-36)
5	Doug McMillan letter to Rachel Tudor dated 4/30/2010 RE: Denial of Application for Tenure and Promotion (DEF37-38)(Plaintiff's Depo Exhibit #102)
6	Memorandum from Charla Hall, James Knapp, Larry Prather to Rachel Tudor dated 9/30/2010; Copied to: Larry Minks, Doug McMillan, Charles Weiner; Bryon Clark and Randy Prus RE: Grievance (DEF5192)
7	Grievance dated 10/11/2010 (DEF49-64)(Plaintiff's Depo Exhibit #15)
8	Memorandum from Ross Walkup to Rachel Tudor, Doug McMillan and Charla Hall dated 1/3/2011 RE: Grievance filed 10/11/2011(DEF65-68)(Attachment to Memo is Plaintiff's Depo Exhibit #74)
9	Non-Renewal Letter dated 2/22/2011 (DEF1464)
10	Letter from Bryon Clark to Rachel Tudor dated 3/4/2011 RE: Appeal (DEF76-80)
11	Document prepared by James L. Knapp dated 9/23/2010 RE: Grievance (DEF144)(Plaintiff's Depo Exhibit #71)
12	DOE letters to Barbara Seely, Larry Minks and Rachel Tudor dated 10/12/2010 RE: OCR Docket #07102099 (DEF170-175)
13	Memorandum from Doug McMillan to Rachel Tudor dated 10/5/2010 RE: Application for Tenure and Promotion during the 2010-2011 Academic Year (DEF221)(Plaintiff's Depo Exhibit #107)
14	RUSO Policy Manual (DEF254-366)

15	SEOSU Academic Policies and Procedures (DEF367-516)
16	SEOSU Sexual Harassment Policy (DEC524-526)
17	SEOSU Nondiscrimination Equal Opportunity Affirmative Action Policy (DEF528)
18	SEOSU Retaliation Policy (DEF529-530)
19	SEOSU Tenure and Promotion Policy (DEF606-708)
20	SEOSU Religion and EHL Faculty Policy (DEF709-710)
21	Rachel Tudor File from Human Resources (including I-9, Garnishment and Unemployment documents as produced to EEOC (DEF712-1012)
22	Lucretia Scoufos email to Rachel Tudor dated 8/25/2009 RE: Tenure – with Dr. Scoufos’ handwritten notes (DEF1014-1015)
23	Documents sent to SEOSU by DOE (DEF1301-1309)
24	SEOSU Orientation of New Faculty, Agenda and Sample Handouts (DEF1311-1460)(Contains Plaintiff’s Depo Exhibits #s 21, 40)
25	Timeline of Affirmative Action Officer at SEOSU (DEF1463-1466)(Plaintiff’s Depo Exhibit #112)
26	Memorandum from Cathy Conway to Claire Stubblefield dated 8/15/2011 RE: EEOC Request for Information on Dr. Rachel Tudor Discrimination Charges (DEF1468)
27	Memorandum from Doug McMillan to William Fridley dated 4/30/2010 RE: Denial of Application for Tenure and Promotion (DEF1727-1728)
28	Memorandum from Doug McMillan to Rachel Tudor dated 2/15/2010 RE: Notification of Promotion Status (DEF1753)
29	Memorandum to Dr. Weiner from James Knapp, Larry Prather and Jon Reid dated 3/25/2010

	RE: Appeal of Dr. Rachel Tudor (DEF1757)(Plaintiff's Depo Exhibit #47)
30	Memorandum from Larry Minks to Rachel Tudor dated 4/21/2010 RE: Application for Tenure and Promotion to Associate Professor (DEF1462)
31	Letter from Larry Minks to Rachel Tudor dated 3/25/2011 RE: Appeal Review regarding the rejection of Dr. Tudor's Tenure and Promotion Application (DEF1463)
32	SEOSU Position Statement (DEF1779-1785)(Plaintiff's Depo Exhibit #30)
33	Schematic of Morrison Building (DEF1787-1789)(Plaintiff's Depo Exhibit #27)
34	Findings and Conclusions on Gender Discrimination Complaint from Claire Stubblefield to Rachel Tudor dated 1/19/2011 (DEF1795-1801)(Plaintiff's Depo Exhibit #19)
35	Memorandum from Ross Walkup to Rachel Tudor, Doug McMillan, Charla Hall dated 1/3/2011 RE: Grievance filed 10/11/2010 (DEF5668-5671)
36	SEOSU Faculty Promotion and Tenure Evaluation Summary – Confidential Analysis Worksheet for Rachel Tudor signed by Lucretia Scoufos dated 1/14/2010) (DEF5075-5076)(Plaintiff's Depo Exhibit #126)
37	Paula Smith Allen email to John Mischo dated 11/3/2008 RE: Tenure and Promotion of Dr. Tudor (DEF5077)
38	Lucretia Scoufos email to Ross Walkup dated 1/3/2011 RE: FW: Tenure and Promotion Report (DEF5078)(Plaintiff's Depo Exhibit #148)
39	Acknowledgement of Receipt dated 10/7/2010 of Memorandum from Doug McMillan dated 10/5/2010 with Handwritten note of Lucretia Scoufos that Rachel Tudor refused to sign in the presence of Randy Prus (DEF5079)
40	Portfolio Transmittal Form for Rachel Tudor dated 10/15/2009 and signed as reviewed by Lisa Coleman on 11/18/09; John Mischo on 11/29/09; Lucretia Scoufos on 1/14/2010; and Doug McMillan on 2/10/2010 (DEF5080)

41	Rachel Tudor email to Doug McMillan and copy to John Mischo dated 2/19/2010 RE: Tenure; ATTACHMENT: Letter to Doug McMillan from Rachel Tudor (DEF5095-5097)
42	Email string between Doug McMillan to Rachel Tudor and Lucretia Scoufos dated 2/19/2010 RE: Tenure (DEF5098-5107)
43	Rachel Tudor email to Lucretia Scoufos and copy to John Mischo dated 2/19/2010 RE: Tenure; ATTACHMENT: Scoufos.docx (DEF5108-5110)(Plaintiff's Depo Exhibits #96 and #97)
44	Acknowledgment of Receipt of 4/29/2010 letter from Charles Weiner dated 4/29/2010 RE: Decision Rendered by Faculty Appellate Committee (DEF5122)
45	Charles Weiner letter to Rachel Tudor dated 4/29/2010 RE: Decision Rendered by Faculty Appellate Committee (DEF5123-5124)(Plaintiff's Depo Exhibit #45)
46	Bryon Clark email to Rachel Tudor; Copied to: Doug McMillan; Ross Walkup; Charla Hall; James Knapp; Larry Prather dated 2/11/2011 RE: Response to 7 Feb. 2011 e-mail ATTACH: Addition to Grievance Policy 24 Jan 2011; Grievance Policy Section 4.4.6 APPM; Tudor Grievance dated 11 October 2010; Response to Policy Change (DEF5156-5127)
47	Memorandum from Bryon Clark to Doug McMillan dated 2/22/2011 RE: Appeal of Faculty Appellate Committee's Recommendation in the Rachel Tudor Grievance Concerning the 2010-2011 Decision not to Allow her Application for Tenure and Promotion (DEF5158)(Plaintiff's Depo Exhibit #75)
48	Rachel Tudor email to Bryon Clark dated 3/4/2011 attaching 3/4/2011 Appeal RE: Appeal (DEF5159-5164)(Plaintiff's Depo Exhibit #76)
49	Rachel Tudor letter to Larry Minks; Copied to: Randy Prus dated 8/30/2010

	RE: Improprieties and Due Process Policy Violations by Administrators in Tenure and Promotion Process (DEF5617-5634)(Plaintiff's Depo Exhibit #56)
50	Lucretia Scoufos email to Doug McMillan dated 10/7/2010 RE: Rachel Tudor (DEF5189)(Plaintiff's Depo Exhibit #14)
51	Complaint from Rachel Tudor to Claire Stubblefield; Copied to: Randy Prus; dated 8/30/2010 (DEF8213-5218)
52	Rachel Tudor email to Bryon Clark dated 2/7/2011 RE: Response to Policy Change ATTACH: Amended Faculty Grievance Policy (DEF5256-5258)
53	Lucretia Scoufos email to Ross Walkup dated 1/3/2011 RE: Rachel Tudor's AY 2009-10 Departmental File (DEF5266)
54	Lucretia Scoufos email to Lisa Coleman dated 5/9/2011 RE: FW: Tenure and Promotion Report (DEF5287)
55	William Fridley email string with Kenneth Chinn dated 5/9/2011 RE: Rachel Tudor (DEF5288-5293)
56	William Fridley letter to Kathy Nusz dated 4/8/2012 RE: EEOC Request for Faculty Senate Documentation Pertaining to Dr. Tudor (DEF5317)
57	Charles Weiner, Rachel Tudor email string dated 3/4/2010 RE: Faculty Appeal (DEF5320)
58	Larry Minks letter to Rachel Tudor dated 3/25/2011 RE: Appeal Review regarding the rejection of Dr. Tudor's Tenure and Promotion Application (DEF5321)(Plaintiff's Depo Exhibit #77)
59	Rachel Tudor letter to Lucretia Scoufos dated 4/6/2010 RE: Offer with handwritten notes by Lucretia Scoufos dated 4/7/2010 (EEOC914)(Plaintiff's Depo Exhibit #151)
60	Larry Minks Memorandum to Rachel Tudor dated 4/21/2010

	RE: Application for Tenure and Promotion to Associate Professor (DEF5327)
61	Rachel Tudor letter titled "In re: Dr. Weiner's letter" (DEF5328)
62	Charles Weiner letter to Rachel Tudor dated 4/29/2010 (DEF5329-5330)
63	Rachel Tudor letter to Larry Minks dated 5/7/2010 RE: Appeal (DEF5331)(Plaintiff's Depo Exhibit #54)
64	Rachel Tudor email to William Fridley; Christopher Moretti; Dennis Brewster; George Jacox; Halet Poovey dated 11/9/2010 (DEF5332)
65	DOE letter to Larry Minks dated 10/12/2010 RE: OCR Docket #07102099 (DEF5333-5342)
66	EEOC letter to Charles Babb dated 3/14/2013 RE: Rachel Tudor v. SEOSU – EEOC Charge Number: 564-2011-00849 (DEF5345-5346)
67	Claire Stubblefield memo to Lucretia Scoufos dated 8/3/2011 RE: Important Information Regarding EEOC Charge attaching Document Retention Notice Pursuant to Charge of Discrimination (DEF5348-5351)(Attachment is Plaintiff's Depo Exhibits #20; #35; #113)
68	Bryon Clark email to Rachel Tudor; Doug McMillan dated 1/31/2011 RE: Tudor Grievance dated 10/11/2010 (DEF5361)(Plaintiff's Depo Exhibit #72)
69	Bryan Clark – Rachel Tudor email string dated 2/14/2011 RE: Response to 2/7/2011 email with attachments (DEF5365-5373)
70	Larry Minks letter to Rachel Tudor dated 2/21/2011 RE: Appeal of the Findings and Conclusions on Gender Discrimination Complaint (DEF5386)(Plaintiff's Depo Exhibit #132)
71	Complaint by Rachel Tudor dated 8/30/2010 (DEF5388-5394)(First 6 pages of Plaintiff's Depo Exhibit #55)
72	Claire Stubblefield letter to Rachel Tudor

	RE: Receipt of Complaint (DEF5396)
73	Rachel Tudor letter to Claire Stubblefield dated 10/13/2010 RE: Additional Information (DEF5397-5399)(Plaintiff's Depo Exhibit #108)
74	Amended Complaint by Rachel Tudor dated 10/28/2010 (DEF5400-5406)(Plaintiff's Depo Exhibit 110)
75	Rachel Tudor letter to Larry Minks dated 1/28/2011 RE: Appeal of Dr. Stubblefield's Findings and Conclusions on Gender Discrimination Complaint (DEF5407-5409)(Plaintiff's Depo Exhibit #131)
76	Charles Weiner-Rachel Tudor email string dated 9/16/2010 FW: Faculty Appeal (DEF5420-5423)(Plaintiff's Depo Exhibit #57)
77	Lurcretia Scoufos letter to Doug McMillan dated 1/12/2010 RE: Recommendation to deny tenure and to give Rachel Tudor, a one-year termination appointment at the rank of Assistant Professor in the Department of English, Humanities and Languages for the 2010-2011 Academic Year (DEF5424)(Plaintiff's Depo Exhibit #100)
78	Rachel Tudor email to Claire Stubblefield dated 10/7/2010 RE: Retaliation (DEF5426)(Plaintiff's Depo Exhibit #105)
79	Virginia Parrish email to Claire Stubblefield dated 11/16/2010 RE: Tenure and Promotion Portfolio (DEF5451-5152)
80	Lucretia Scoufos email to Doug McMillan dated 11/30/2010 FW: Article with attachment (DEF5453-5464)(Portion of Plaintiff's Depo Exhibit #101)
81	Rachel Tudor email to Claire Stubblefield dated 9/14/2010 RE: Scoufos Letter (DEF5467)
82	Sample Application Portfolio for Promotion to Associate Professor Rank with Tenure Status (DEF5835-5846)
83	

84	Academic Policies and Procedures 2014-2015 (DEF5863-6029) Example to be used in the event injunctive relief is order.
85	Academic Policies and Procedures (DEF6030-6180)
86	Temporary and Supplemental Salary Schedules 2011-2012 (DEF6183)
87	Sexual Harassment Policy – Appendix C Source: Policy Manual of Board of RUSO, Sec. 4.6)(DEF6184-6185)(Plaintiff's Depo Exhibit #34)
88	Faculty Development and Evaluation Criteria – Appendix D (DEF6186)
89	Catalog of Faculty Development and Evaluation Criteria – Appendix B (DEF6187-6193)
90	Faculty Development Agreement – Appendix F (DEF6194)
91	SEOSU Faculty Development and Evaluation Summary – Appendix G (DEF6195-6197)
92	Portfolio Transmittal Form (DEF6203)
93	Cathy Conway memo to Claire Stubblefield dated 8/16/2011 RE: EEOC Information Required – Dr. Rachel Tudor Transmittal of Copies of all documents in Charging Party's Personnel File (6204)
94	Benefit Programs for Employees of SEOSU (DEF6591-6623)
95	Follow-Up Faculty Development Agreement 2005-2006 – School of Arts and Letters dated 9/8/2006 (DEF7183-7184)
96	Follow-Up Faculty Development Agreement 2005-2006 – School of Arts and Letters dated 11/4/2005 (DEF7185-7186)(Plaintiff's Depo Exhibit #81)
97	Faculty Development Follow-Up dated 9/15/2005 (DEF7187-7188)(Plaintiff's Depo Exhibit #81)

98	Follow-Up Faculty Development Agreement 2006-2007 – School of Arts and Letters dated 9/28/2007 (DEF7189-7191)(Plaintiff’s Depo Exhibit #82)
99	Follow-Up Faculty Development Agreement 2006-2007 – School of Arts and Letters dated 9/8/2006 (DEF7192-7193)
100	Follow-Up Faculty Development Agreement 2007-2008 – School of Arts and Letters signed but not dated (DEF7197-7199)
101	SEOSU Faculty Development and Evaluation Summary for Rachel Tudor dated 10/30/2008 – Evaluation Period 2007-2008 (DEF7200-7201)(Plaintiff’s Depo Exhibit #83)
102	Follow-Up Faculty Development Agreement 2007-2008 – School of Arts and Letters dated 9/28/2007 (DEF7202-7203)
103	Follow-Up Faculty Development Agreement 2008-2009 – School of Arts and Letters dated 10/7/2008 (DEF7204-7205)
104	Faculty Promotion and Tenure Evaluation of Rachel Tudor (DEF7703-7704)(Plaintiff’s Depo Exhibit #127)
105	Screening Committee Packet for Faculty Positions at SEOSU (DEF7705-7730)
106	SEOSU Policy Presentation on Sexual Harassment (DEF7731-DEF7772)
107	Sexual Harassment and Anti-Discrimination presentation (DEF7773-7809)
108	Sexual Harassment Training for Greek Organizations (DEF7810-7830)
109	Athletic Department Training Modules (DEF7831-7848)
110	Title IX Overview for Mandatory Training (DEF7849-DEF7866)
111	Title IX Primer for SE Campus Police (DEF7867-DEF7888)

112	ATIXA Campus Title IX Coordinator and Admin. Train. & Cert. Course (DEF7889-DEF8180)
113	Title IX: A New ERA of Responsibility (DEF8181-DEF8204)
114	Appreciating, Accepting, and Celebrating Differences Through Tolerance... (DEF8205-DEF8229)
115	HR Trainings Attended by Cathy Conway (DEF8830-DEF8833)(Plaintiff's Depo Exhibit #24)
116	February 27, 2006 email from Cathy Conway re: test group Sexual Harassment Training (DEF8896-8897)
117	April 5, 2006 email from Cathy Conway to group re: training (DEF8899-8901)(Plaintiff's Depo Exhibit #41)
118	List of SE Sexual Harassment Training Presentation attendees (DEF8904-8910)(Plaintiff's Depo Exhibit #41)
119	BLR's Human Resources Training Presentations on Sexual Harassment (DEF8915-8946)(Plaintiff's Depo Exhibit #42)
120	Academic Policies Final as of 11-11-04 (DEF10627-10796)
121	Academic Policies Final as of 1/7/2005 (DEF9256-9426)
122	Academic Policies Final as of 1/10/2005 (DEF9427-9597)
123	Academic Policies Final as of 1/17/2005 (DEF9598-DEF9768)
	Academic Policies Final as of 1/19/2005 (DEF9769-9940)
124	Academic Policies Final as of 8/23/2005 (DEF9941-10113)
125	Academic Policies Final as of 10/18/2005 (DEF10114-10287)

126	Academic Policies and Procedures manual 10/31/2007 (DEF8954-9106)
127	Academic Policies and Procedures manual 8/5/2008 (DEF9107-9225)
128	Academic Policies and Procedures manual 2009-2010 (DEF10947-11094)
129	Academic Policies and Procedures manual 2014-2015 (DEF11576-11742)
130	Memorandum to Rachel Tudor from Doug McMillan dated 2/15/2010 RE: Notification of Promotion Status (DEF13001-13002)
131	Email from The Chronicle (DEF13016-13018)
132	“Candidate’s Letter in Support...” with comments by Dr. Randy Prus (DEF13019-13023)(Plaintiff’s Depo Exhibit #10)
133	Documents received from schools cited by Intervenor as places to which post-SEOSU applications were made for employment (DEF13024-13449)
134	OU Additional Response to Subpoena Duces Tecum (DEF13629)
135	CV – Rachel Tudor (DEF13630-13638)
136	Handwritten note of Claire Stubblefield dated 10/26 (DEF13643)
137	Legal Briefing: Respectful Workplace dated 3/6/2012 by Charlie Babb (DEF13647-13667)
138	Legal Briefing: Helping Create a Respectful Workplace dated 4/19-20/2006 by Charlie Babb (DEF13668-13671)
139	DOE letter to Larry Minks dated 9/15/2010 RE: OCR Docket #07102099 (DOE000003)
140	Note regarding 6/1/2007 call with Dr. Tudor about policies (DOJ000009)
141	Corie Delashaw letter to Tenure Review Committee RE: Dr. Rachel Tudor/Application for Tenure (DOJ000015)

142	Louis Lopez email to Rachel Tudor dated 7/24/2013 copied to Allan Townsend RE: EEOC Charge at DOJ (DOJ000134)
143	Allan Townsend email to Rachel Tudor dated 8/13/2013 RE: EEOC Charge at DOJ (DOJ000135-136)
144	Rachel Tudor email to Allan Townsend dated 8/13/2013 RE: EEOC Charge at DOJ (DOJ000137-139)
145	Allan Townsend email to Rachel Tudor dated 8/13/2015 RE: EEOC Charge at DOJ (DOJ000140-142)
146	Rachel Tudor email to Allan Townsend dated 8/13/2013 RE: EEOC Charge at DOJ (DOJ00143-146)
147	Rachel Tudor email to Allan Townsend dated 8/15/2013 RE: September 26, 2010 email (DOJ000147)
148	Rachel Tudor email to Allan Townsend dated 8/16/2013 RE: Scoufos letters (DOJ000149)
149	Rachel Tudor email to Allan Townsend dated 11/25/2013 RE: Decision? (DOJ000152)
150	Allan Townsend email to Rachel Tudor dated 11/27/2013 copied to Louis Lopez RE: Decision? (DOJ000153-154)
151	EEOC Request for Information regarding Charge #564-2011-00849 outlining issues (DOJ01663-1674)
152	Notice of Right to Sue within 90 Days dated 4/2/2015 (DOJ004574)
153	EEOC Determination letter (DOJ004576-4577)
154	EEOC Charge of Discrimination signed by Rachel Tudor(DOJ4592-4593)
155	EEOC Charge of Discrimination dated 7/6/211 (DOJ004595-4596)
156	Rachel Tudor email to Kathy Nusz dated 2/6/2012

	RE: Thursday, February 9, 2012 (DOJ004612-4613)
157	Medical records produced by Rachel Tudor in Discovery (PI000428-432)
158	SEOSU Payroll Advice for 1/1/2011 – 1/31/2011 for Rachel Tudor (PI000449)
159	SEOSU Payroll Advise for 1/1/2011 – 1/31/2011 for Rachel Tudor (PI000452)
160	Cary Isreal with Collin College Memorandum to Rachel Tudor dated 8/30/2013 RE: Compensation 2013-2014 (PI000453)
161	Cary Isreal with Collin College Memorandum to Rachel Tudor dated 9/3/2014 RE: Compensation 2014-2015 (PI000454)
162	Collin County Community College District Full-Time Faculty Contract beginning 8/12/2014 and ending May 2016 signed by Rachel Tudor on 4/22/2015 (PI000455-456)
163	Kathy Nusz's handwritten notes of EEOC interview of James Knapp (EEOC4798-4799)
164	Kathy Nusz's handwritten notes of EEOC interview of Doug McMillan (EEOC4821-4829)
165	EEOC Typed Questions for Doug McMillan Interview (EEOC4815-4817)
166	Kathy Nusz's handwritten notes of EEOC interview of Larry Minks on 2/8/2012 (EEOC4811-4814)
167	Kathy Nusz's handwritten notes of EEOC interview of John Mischo on 2/8/2012 (EEOC4835-4838)
168	Kathy Nusz's handwritten notes of EEOC interview of Virginia Parrish (EEOC4777-4780)
169	Kathy Nusz's handwritten notes of EEOC interview of Larry Prather (EEOC4791-4793)

170	Kathy Nusz's handwritten notes of EEOC interview of Randy Prus (EEOC4769-4771)
171	Kathy Nusz's handwritten notes of EEOC interview of Lucretia Scoufos (EEOC4843-4858)
172	Kathy Nusz's handwritten notes of EEOC interview of Wilma Shires (EEOC4776)
173	Kathy Nusz's handwritten notes of EEOC interview of Mark Spencer (EEOC4785-4790)
174	Kathy Nusz's handwritten notes of EEOC interview of Claire Stubblefield on 2/8/2012 (EEOC4830-4834)
175	Kathy Nusz's handwritten notes of EEOC interview of Ross Walkup (EEOC4807-4820)
176	Kathy Nusz's handwritten notes of EEOC interview of Charles Weiner on 2/8/2012 (EEOC4839-4842)
177	Kathy Nusz's handwritten notes of EEOC interview of Caryn Witten (EEOC4767-4768)
178	Kathy Nusz's handwritten notes of EEOC interview of Jane McMillan (EEOC4794-4797)
179	Kathy Nusz's handwritten notes of EEOC interview of William Fridley (EEOC4802-4806)
180	Kathy Nusz's handwritten notes of EEOC interview of Margaret Cotter-Lynch (EEOC4867-4872)
181	Kathy Nusz's handwritten notes of EEOC interview of Cathy Conway on 2/8/2012 (EEOC4809-4810)
182	Kathy Nusz's handwritten notes of EEOC interview of Lisa Coleman (EEOC4762-4764)
183	Kathy Nusz's handwritten notes of EEOC interview of Bryon Clark (EEOC4818)

184	Kathy Nusz's handwritten notes of EEOC interview of Janet Barker (EEOC4783-4784)
185	Kathy Nusz's handwritten notes of EEOC interview of Teresa Anderson (EEOC4781-4782)
186	Kathy Nusz's handwritten notes of EEOC interview of Daniel Althoff (EEOC4772-4773)
187	Kathy Nusz's handwritten notes of EEOC interview of Paula Allen (EEOC4774-4775)
188	Transcript and Audio of EEOC Interview of Ross Walkup
189	Transcript and Audio of EEOC Interview John Mischo
190	Transcript and Audio of EEOC Interview of Bryon Clark
191	Transcript and Audio of EEOC Interview of Claire Stubblefield
192	Transcript and Audio of 2/9/2012 DOJ Interview of Jane McMillan
193	Transcript and Audio of 2/8/2012 DOJ Interview of Larry Minks
194	Transcript and Audio of 2/8/2012 DOJ Interview of Doug McMillan
195	Transcript and Audio of 2/8/2012 DOJ Interview of Charles Weiner
196	Transcript and Audio of 2/8/2012 DOJ Interview of Cathy Conway
197	Kathy Nusz letter to Claire Stubblefield dated 1/5/2012 RE: Additional Information Needed and Request to Interview Personnel (EEOC4743-4744)(Plaintiff's Depo Exhibit #43)
198	Claire Stubblefield email to Kathy Nusz dated 1/11/2012 RE: February 7th date (EEOC4741-4742)(Plaintiff's Depo Exhibit #43)
200	Rachel Tudor email to John Mischo dated 10/27/2009

	RE: Tenure Promotion Committee (PI000583)(Plaintiff's Depo Exhibit #87)
201	Lucretia Scoufos email to Ross Walkup dated 1/3/2011 RE: Scoufos.pdf (DEF1132-1135)(Plaintiff's Depo Exhibit #139)
202	Memorandum from Larry Minks to Lucretia Scoufos dated 6/15/2010 RE: Notification of Tenure and/or Promotion Decision (EEOC902)(Plaintiff's Depo Exhibit #152)
203	Randy Prus email to Lucretia Scoufos dated 4/30/2010 RE: "Open Mic" publisher (EEOC904)(Plaintiff's Depo Exhibit #154)
204	All pleadings of record filed by any party in the case.
205	Defendants reserve the right to introduce additional documents obtained through ongoing discovery.
206	DOJ/EEOC – documents reflecting position on Title VII coverage in 2007, 2009-2010, 2010-2011.
207	DOJ/EEOC documents regarding health insurance provided to its employees in 2007 through 2011.
208	EEOC documents produced by Grant Doty.
209	Rachel Tudor's Personnel File from Collin College (CC1-CC1083)
210	All exhibits listed by Plaintiff not objected to by Defendants.
211	All exhibits listed by Plaintiff/Intervenor not objected to by Defendants.
212	All documents needed for rebuttal purposes.

Respectfully submitted,

/s/ Jeb E. Joseph

DIXIE L. COFFEY, OBA #11876

JEB E. JOSEPH, OBA #19137

KINDANNE JONES, OBA #11374

Assistant Attorneys General Oklahoma
Attorney General's Office
Litigation Division
313 NE 21st Street
Oklahoma City, OK 73105
Telephone: 405.521.3921
Facsimile: 405.521.4518
*Attorneys for Defendants Southeastern
Oklahoma State University and The Regional
University System of Oklahoma*

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of August 2016, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Delora Kennebrew
Meredith Burrell
Valerie Meyer
Shayna Bloom
US DEPT. OF JUSTICE CIVIL RIGHTS DIVISION-DC
950 Pennsylvania Avenue NW Rm 49258 PHB
Washington, DC 20530
Email: delora.kennebrew@usdoj.gov
meredith.burrell@usdoj.gov
valerie.meyer@usdoj.gov
shayna.bloom@usdoj.gov
Attorneys for United States of America

Brittany Novotny
NATIONAL LITIGATION LAW GROUP, PLLC
42 Shepherd Center
2401 NW 23rd Street
Oklahoma City, OK 73107
Email: bnovotny@nationlit.com
Attorney for Intervenor Plaintiff

Jillian Weiss
Ezra Young
LAW OFFICE OF JILLIAN T. WEISS, P.C.
PO Box 642
Tuxedo Park, NY 10987
Email: jtweiss@jtweisslaw.com
Email: eyoung@jtweisslaw.com
Attorney for Intervenor Plaintiff

Allan K. Townsend
c/o Kay Sewell, Assistant U.S. Attorney
U.S. Attorney's Office for the
Western District of Oklahoma
210 W. Park Ave., Ste. 400
Oklahoma City, OK 73102
Email: allan.townsend@usdoj.gov
Attorney for United States of America

/s/Jeb E. Joseph

Jeb E. Joseph