

**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.)	

**UNOPPOSED MOTION TO EXTEND DEADLINE FOR PARTIES TO FILE
PROPOSED SCHEDULE**

Pursuant to Local Rule 7.1, Plaintiff United States of America (“United States”) respectfully requests that the Court extend the deadline for the parties to file a proposed schedule. Defendants and Plaintiff-Intervenor have stated that they have no objection to the proposed extension. In the Court’s order granting the parties’ original request for a judicial settlement conference, the Court accepted the parties’ suggestion to require a proposed schedule for the remainder of the case to be filed within a week after the settlement conference if the parties did not reach a settlement-in-principle. ECF No. 132 at 1. The parties attended a settlement conference with Magistrate Judge Goodwin on May 5, 2017, but were unable to reach a settlement. ECF No. 134. As such, the current deadline to file a proposed schedule is May 12, 2017.

The United States believes that continued settlement discussions may facilitate a settlement of at least some of the claims in this case. To allow time for those settlement discussions to occur, the parties request that the Court extend the deadline for filing a proposed schedule to June 1, 2017. The parties may seek another settlement conference with Magistrate Judge Goodwin, and would make any such request prior to June 1, 2017.

The parties propose timing similar to the process described in the Court's prior Order directing the parties to a settlement conference (ECF No. 132). Under this proposed process, if a settlement-in-principle that resolves the United States' and Dr. Tudor's claims is not reached by June 1, 2017, the parties would alert the Court on June 1, 2017, of the failure to reach a settlement-in-principle that resolves all claims. The parties would then be required to file a proposed schedule one week later, on June 8, 2017. If the parties reach a settlement-in-principle that resolves all of the United States' and Dr. Tudor's claims by June 1, 2017, the parties would notify the Court of the settlement-in-principle and reduce the agreement-in-principle to a final agreement as expeditiously as possible; but if the agreement-in-principle was not memorialized by June 15, 2017, any party could request that the Court issue a scheduling order.

This is the first time that any of the parties have requested an extension of this deadline. Because the case is currently stayed, this extension will not impact any other deadlines in the case.

For the foregoing reasons, the United States respectfully requests that the Court enter the order filed with this Motion.

Respectfully submitted,

Date: May 12, 2017

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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: May 12, 2017

/s/ Valerie L. Meyer

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SYSTEM OF OKLAHOMA,)	
)	
Defendants.)	

[PROPOSED] ORDER

Without objection, the United States’ Unopposed Motion to Extend Deadline for Parties to File Proposed Schedule (ECF No. 135) is GRANTED. The parties requested this extension for the purpose of engaging in settlement negotiations. If a settlement-in-principle that resolves the United States’ and Dr. Tudor’s claims is not reached by June 1, 2017, the parties shall alert the Court on June 1, 2017, of the failure to reach a settlement-in-principle that resolves all claims and shall file a proposed schedule on or before June 8, 2017. If the parties reach a settlement-in-principle that resolves all of the United States’ and Dr. Tudor’s claims by June 1, 2017, the parties shall notify the Court of the settlement-in-principle and reduce the agreement-in-principle to a final agreement as expeditiously as possible; but if the agreement-in-principle is not memorialized by June

15, 2017, any party may request that the Court issue a scheduling order.

Dated this __ day of May, 2017.

ROBIN J. CAUTHRON
United States District Judge