

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

United States of America,	)
Plaintiff,	)
	)
and	)
	)
Dr. Rachel Tudor,	)
Plaintiff/Intervenor,	)
	)
v.	)
	)
Southeastern Oklahoma State	)
University,	)
	)
and	)
	)
Regional University System of	)
Oklahoma,	)
Defendants.	)

Case No. 5:15-cv-00324-c

**MOTION TO WITHDRAW AS ATTORNEY OF RECORD**

COME NOW, Transgender Legal Defense and Education Fund, Inc. (“TLDEF”) and attorney Jillian T. Weiss and respectfully request this Court for an Order pursuant to LCvR 83.5 allowing Jillian T. Weiss on behalf of TLDEF to withdraw as attorney of record for Plaintiff/Intervenor Dr. Rachel Tudor. In support of this Motion, the Movant would show the Court as follows:

1. Jillian T. Weiss, on behalf of TLDEF, is currently listed as representing Plaintiff/Intervenor Dr. Tudor in this action.

2. Attorney Ezra Young formerly represented Plaintiff/Intervenor Dr. Tudor on behalf of TLDEF.
3. Mr. Young has filed a Notice of Change of Firm Affiliation with the Court to indicate his affiliation with the Law Office of Ezra Young.
4. By mutual agreement of Plaintiff/Intervenor Dr. Tudor, TLDEF and Mr. Young, on May 19, 2017, as set forth in Exhibit 1, Ms. Weiss on behalf of TLDEF is to withdraw as attorney of record in this action.
5. Plaintiff United States of America was notified of Ms. Weiss's intent on behalf of TLDEF to withdraw as attorney of record in this action via email on May 19, 2017, as set forth in Exhibit 2.
6. Defendants Southeastern Oklahoma State University and Regional University System of Oklahoma were notified of Ms. Weiss's intent on behalf of TLDEF to withdraw as attorney of record in this action via email on May 22, 2017, as set forth in Exhibit 3.
7. Mr. Young will continue to represent Plaintiff/Intervenor Dr. Tudor in this action going forward, in his own capacity and not on behalf of TLDEF, as set forth in Exhibit 2.

WHEREFORE, attorney Jillian T. Weiss on behalf of TLDEF respectfully requests this Court for an Order pursuant to LCvR 83.5 allowing Jillian T. Weiss on behalf of TLDEF to withdraw as attorney of record for Plaintiff/Intervenor Dr. Rachel Tudor.

Dated: May 23, 2017

Respectfully submitted,

/s/ Jillian T. Weiss\_\_\_\_\_

Jillian T. Weiss

NY Bar No. 2125011

*Attorney for Plaintiff/Intervenor*

Transgender Legal Defense and  
Education Fund, Inc.

20 West 20<sup>th</sup> Street, Suite 705

New York, NY 10011

Telephone: (646) 862-9396

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[jweiss@transgenderlegal.org](mailto:jweiss@transgenderlegal.org)

*Admitted Pro Hac Vice*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 23, 2017, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will automatically serve all counsel of record.

**/s/ Jillian T. Weiss**\_\_\_\_\_

Jillian T. Weiss

NY Bar No. 2125011

*Attorney for Plaintiff/Intervenor*

Transgender Legal Defense and  
Education Fund, Inc.

20 West 20<sup>th</sup> Street, Suite 705

New York, NY 10011

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*Admitted Pro Hac Vice*

# **EXHIBIT**

# **1**

----- Forwarded message -----

From: Rachel Tudor <[racheltudor3731@gmail.com](mailto:racheltudor3731@gmail.com)>

Date: Fri, May 19, 2017 at 5:11 PM

Subject: Re: Attorney representation

To: Jillian Weiss <[jweiss@transgenderlegal.org](mailto:jweiss@transgenderlegal.org)>

Yes.

Thank you!

On Fri, May 19, 2017 at 4:02 PM, Jillian Weiss

<[jweiss@transgenderlegal.org](mailto:jweiss@transgenderlegal.org)> wrote:

>

> Hi Rachel:

>

> This is to confirm our conversation that you will have Ezra represent  
> you as your attorney as of now, and not TLDEF or me.

>

> We will give him access to all of your online files immediately.

>

> You may at a later date wish to return representation to TLDEF, and I  
> have stated that I have no opposition to TLDEF taking on  
> representation of you in the future.

>

> If you or Ezra need anything, please don't hesitate to contact me.

> You will have my full cooperation.

>

> Please reply to indicate that I have correctly stated our conversation.

>

> Best,

>

> Jill

>

> --

> Jillian Weiss

> Executive Director

>

>

>

> Transgender Legal Defense

> & Education Fund, Inc.

>

> 20 West 20th Street

# **EXHIBIT**

# **2**

----- Forwarded message -----

From: **Ezra Young** <[ezra.i.young@gmail.com](mailto:ezra.i.young@gmail.com)>

Date: Fri, May 19, 2017 at 6:07 PM

Subject: Re: Rachel Tudor

To: "Townsend, Allan (CRT)" <[Allan.Townsend@usdoj.gov](mailto:Allan.Townsend@usdoj.gov)>

Cc: Jillian Weiss <[jweiss@transgenderlegal.org](mailto:jweiss@transgenderlegal.org)>, Brittany Novotny <[BNovotny@nationlit.com](mailto:BNovotny@nationlit.com)>, "Meyer, Valerie (CRT)" <[Valerie.Meyer@usdoj.gov](mailto:Valerie.Meyer@usdoj.gov)>, "Bloom, Shayna (CRT)" <[Shayna.Bloom@usdoj.gov](mailto:Shayna.Bloom@usdoj.gov)>, "Burrell, Meredith (CRT)" <[Meredith.Burrell@usdoj.gov](mailto:Meredith.Burrell@usdoj.gov)>

Counsel:

Apologies for the confusion here. Dr. Rachel Tudor, has asked that TLDEF be replaced as counsel in this matter by Ezra Young, Esq., and as result please direct all communications to Mr. Young at [ezraiyoung@gmail.com](mailto:ezraiyoung@gmail.com), and until TLDEF is relieved by the Court of representing Dr Tudor, [jweiss@transgenderlegal.org](mailto:jweiss@transgenderlegal.org). Brittany Novotny will continue on as Dr. Tudor's local counsel.

Please let me know if any further clarification is needed.

Best,

Ezra

# **EXHIBIT**

# **3**

----- Forwarded message -----

From: **Ezra Young** <[ezra.i.young@gmail.com](mailto:ezra.i.young@gmail.com)>

Date: Mon, May 22, 2017 at 5:08 PM

Subject: Representation of Dr. Rachel Tudor

To: Dixie Coffey <[dixie.coffey@oag.ok.gov](mailto:dixie.coffey@oag.ok.gov)>, Jeb Joseph <[jeb.joseph@oag.ok.gov](mailto:jeb.joseph@oag.ok.gov)>

Cc: Jillian Weiss <[jweiss@transgenderlegal.org](mailto:jweiss@transgenderlegal.org)>, Brittany Novotny <[BNovotny@nationlit.com](mailto:BNovotny@nationlit.com)>

Dixie and Jeb:

I am writing to inform you that Dr. Tudor has asked that TLDEF be replaced as counsel in this matter by Ezra Young, Esq., and, as a result, please direct all communications to Ezra Young at [ezraiyoung@gmail.com](mailto:ezraiyoung@gmail.com), and, until TLDEF is relieved by the Court of representing Dr. Tudor, Jill Weiss at [jweiss@transgenderlegal.org](mailto:jweiss@transgenderlegal.org). Please also be advised that Brittany Novotny will remain as local counsel in this matter.

Best,

Ezra Young

Attorney at Law

Admitted in NY

30 Devoe, 1a

Brooklyn, NY 11211

P. [949-291-3186](tel:949-291-3186)

F. [917-398-1849](tel:917-398-1849)

E. [ezraiyoung@gmail.com](mailto:ezraiyoung@gmail.com)