

**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’ OBJECTIONS TO PLAINTIFF/INTERVENOR
RACHEL TUDOR’S FINAL EXHIBIT LIST**

Defendants Southeastern Oklahoma State University (“SEOSU”) and The Regional University System of Oklahoma’s (“RUSO”) submit the following objections¹ to Plaintiff/Intervenor’s Final Exhibit List [Doc. 110] in accordance with the Court’s Scheduling Order. [Doc. 142].

NO.	EXPECT TO USE	DESCRIPTION	OBJECTION
1	X	Plaintiff/Intervenor’s Response to Defendants’ First Set of Interrogatories Propounded upon Plaintiff/Intervenor	Fed. R. Evid. 801, 802, 803

¹ Defendants generally object to Plaintiff/Intervenor’s Exhibits as being vague and overly broad. Defendants reserve the right to supplement these objections as documents are more specifically identified. As Plaintiff/Intervenor has incorporated by reference all exhibits identified by Plaintiff, United States [Doc. 109], Defendants incorporate by reference their objections to Plaintiff’s Final Exhibit List and reserve the right to supplement the same.

2	X	10/26/2010 U.S. Department of Education "Dear Colleague" Letter (PI00058-PI000567)	Fed. R. Evid. 401, 402
3		Tudor Deposition Transcripts	Fed. R. Evid. 801, 802, 802
4		Transcript(s) of Plaintiff/Intervenor's 30(b)(6) Deposition of Defendants	Fed. R. Evid. 801, 802, 802
5	X	Contents of binder filled with non-bates marked documents Defendants produced at August 11, 2016 30(b)(6) conference. (822 non-bates marked pages)	Fed. R. Evid. 401, 402, 403; Improper Exhibit Vague and not properly identified; to the extent Tudor is referring to the binder provided to her counsel containing health insurance quotes and health benefits, Defendants object as Plaintiff and Tudor have no claims concerning health coverage and/or benefits. Defendants reserve the right to supplement this objection should the documents become more fully identified.
6	X	Two Documents Defendants promised to produce (but which they have yet to produce) at August 11, 2016 30(b)(6) conference.	Fed. R. Evid. 401, 402, 403; Tudor has no claim concerning health coverage; Vague and not properly identified; Defendants reserve the right to supplement these objections when the documents are properly identified.

7	X	Defendants' Health Plan provided to Employees for Calendar Year 2011 (OAG-013450 – OAG-013628)	Fed. R. Evid. 401, 402, 403; Tudor has no claim concerning health coverage
8	X	Richard Ogden Deposition Transcript	Fed. R. Evid. 801, 802, 803
9		Declaration of Ms. Feleshia Porter (PI002046 – PI002049)	Fed. R. Evid. 401, 402, 403, 801, 802, 901
10		Tudor Application Materials: North Seattle College (OAG-013024 – OAG-013043)	
11		Tudor Application Materials: Southeast Missouri State University (OAG-013044 – OAG-013046)	
12		Tudor Application Materials: Southwestern Oklahoma State University (OAG-013047 - OAG-013050)	
13		Tudor Application Materials: University of Houston-Victoria (OAG-013062 - OAG-013106)	
14		Tudor Application Materials: Pennsylvania State System of Higher Education, Slipper Rock University (OAG-013107 - OAG-013122)	
15		Tudor Application Materials: Trinity Valley Community College (OAG-013123 - OAG-013140)	
16		Tudor Application Materials: East Central University (OAG-013141 - OAG-013174)	
17		Tudor Application Materials: Montgomery College (OAG-013180 - OAG-013199)	
18		Tudor Application Materials: St. Louis Community College (OAG-013200 - OAG-013208)	

19		Tudor Application Materials: Florida Gulf Coast University (OAG-013209 - OAG-013218)	
20		Tudor Application Materials: Pensacola State College (OAG-013219 - OAG-013225)	
21		Tudor Application Materials: Lindsey Wilson College (OAG-013227 - OAG-013245)	
22		Tudor Application Materials: Southern Methodist University (OAG-013246 - OAG-013257)	
23		Tudor Application Materials: Lone Star Community College (OAG-013258 - OAG-013315)	
24		Tudor Application Materials: San Jacinto College (OAG-013330 - OAG-013338)	
25		Tudor Application Materials: Grinnell College (OAG-013339 - OAG-013352)	
26		Tudor Application Materials: University of Iowa (OAG-013410 - OAG-013418)	
27		Tudor Application Materials: Utah Valley University (OAG-013419 - OAG-013449)	
28		5/21/2012 Rejection Letter: East Central University (PI000462)	
29		6/14/2012 Rejection Letter: Glenville State College (PI000462)	
30		6/28/2012 Rejection Letter: New Mexico Highlands University (PI000464)	
31		6/22/2012 Rejection Letter: Florida Institute of Technology (PI000465)	
32		5/21/2012 Rejection Letter: Lindsey Wilson College (PI000466)	

33		3/16/2012 Rejection Letter: Oklahoma Baptist University (PI000467)	
34		Dr. Tudor's handwritten list of colleges tabulating institutions to which she applied for jobs between 2011 and 2012 (PI002050 – PI 002054)	Fed. R. Civ. P. 801, 802, 901
35	X	Emails between Richard Ogden and Sheridan McCaffree titled "RE: Tudor FYI," last email in chain dated 7/13/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
36	X	Email to Charles Babb titled "Transgender Student Issue," last email in chain dated 8/10/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.

37		Emails between Richard Ogden to Sheridan McAffree titled "Re: DOUGLAS MCMILLAN," last email in chain dated 7/27/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
38	X	Emails between Nancy Gerrity and Claire Stubblefield titled "RE: Maxient: McMillan," last email in chain dated 2/8/2016	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
39	X	Emails between Cathy Conway, Ross Walkup, Kay Lynn Roberts titled "FW: Regional University System of Oklahoma Amendment Request," last email in chain dated 7/26/2007	Fed. R. Evid. 401, 402, 403, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly

			identified; Defendants reserve the right to supplement these objections when document is properly identified.
40	X	Emails between Cathy Conway and Debbie Maness titled "FW: Inquiry on Benefits," last email in chain dated 2/26/2010	Fed. R. Evid. 401, 402, 403, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
41		Emails between Sheridan McAffree and Richard Ogden titled "RE: Southeastern," last email in chain dated 5/16/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
42	X	Emails between Sheridan McCaffree and Mike Mitchell titled "RE: HB2999," last email in chain dated 2/29/2012	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b);

			Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
43	X	Emails between Sheridan McAffree and Richard Ogden titled "RE: applying for tenure," last email in chain dated 5/10/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
44	X	Emails between Sheridan McCaffree and Richard Ogden titled "Rachel Tudor," last email in chain dated 7/16/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these

			objections when document is properly identified.
45	X	Emails between Sheridan McCaffree, Richard Ogden and Charles Babb titled "FW: letter in support of Rachel Tudor," last email in chain dated 4/27/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
46	X	Emails between Sheridan McCaffree, Richard Ogden, and Charles Babb titled "FW: Petitions in Support of Rachel Tudor," last email in chain dated 4/29/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
47	X	Emails between Sheridan McCaffree and Connie Reilly titled "FW: scholarship award," last email in chain dated 4/29/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these

			documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
48	X	Email between Sheridan McCaffree, Richard Ogden and Charles Babb titled "advising of pending legal matters," last email in chain dated 6/19/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
49		Email between Sheridan McCaffree and S. Williams titled "FW: Confidential Attorney Client communication re: Larry Minks," last email in chain dated 4/1/2014	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.

50	X	Emails between Elaine Turner, Richard Ogden, Charles Babb, Vickie Ramos and Sheridan McCaffree titled "Minks Resignation Agreement," last email in chain dated 3/29/2014	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
51		Email between Elaine Turner others titled "RE: Confidential Attorney Client communication re: Larry Minks," last email in chain dated 4/1/2014	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
52		Emails between Sheridan McCaffree and Mike Mitchel titled "RE: PERSONAL & CONFIDENTIAL," last email in chain dated 3/1/2012	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper

			Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
53		Emails between Sheridan McAffree, Richard Ogden and Charles Babb titled "RE: The Discrimination...", last email in chain dated 4/27/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
54		Email from John Mischo to Lucretia Scoufos titled "EHL Tenure & Promotion Guidelines," email dated 9/1/2009	Fed. R. Evid. 401, 402, 403, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
55		Email from Jesse Snowden to Lucretia Scofos titled "letter," email dated 9/8/2010	Fed. R. Evid. 401, 402, 403, 801, 802, 901; Fed.

			R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
56		Emails from Jesse Snowden to Lucretia Scoufos titled "P&T – 2011," email dated 1/1/2011	Fed. R. Evid. 401, 402, 403, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
57		Emails between Charla Hall and Byron Clark titled "FW: Respondent's letter," last email in chain dated 11/1/2010	Fed. R. Evid. 401, 402, 403, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these

			objections when document is properly identified.
58		Emails between Larry Minks, Doug McMillan and Michelle Campbell titled "FW: THOUGHT YOU MIGHT WANT TO READ HIS," last email in chain dated 4/25/2011	Fed. R. Evid. 401, 402, 403, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
59	X	Email between Claire Stubblefield and Ross Walkup titled "FW" Tudor-Discrimination Case," dated 12/23/2010	Fed. R. Evid. 401, 402, 403, 801, 802, Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
60		Email from Byron Clark to Larry Minks and Terri Rogers titled "Grievance by Rachel Tudor," dated 3/7/2011	Fed. R. Evid. 401, 402, 403, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these

			documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
61		Email from Joshua Dermott to Charlie Babb titled "NACUANOTES Vol. 11, No. 4 – Transgender Issues on Campus," dated 12/21/2012	Fed. R. Evid. 401, 402, 403, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
62	X	Email from Doug McMillan to Larry Minks titled "Information from Charlie Babb on Tenure," dated 4/21/2010	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.

63	X	Email from Lisa Highfill to Lisa Highfill titled "letter from Pres. Minks for your review," dated 4/6/2010	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
64	X	Emails between Byron Clark and Doug McMillan titled "RE: Appeal and Rose State," last email in chain dated 11/16/2010	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
65	X	Emails between Byron Clark and Charla Hall titled "RE: grievance," last email in chain dated 9/30/2010	Fed. R. Evid. 401, 402, 403, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper

			Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
66	X	Emails between Ross Walkup and Charlie Babb titled 'RE: Grievance by Dr. Tudor,' last email in chain dated 12/20/2010	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
67		Emails between Byron Clark and Charla Hall titled "RE: grievance question," last email in chain dated 1/12/2011	Fed. R. Evid. 401, 402, 403, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.

68		Emails between Byron Clark and Charla Hall titled "RE: Hearing Date," last email in chain dated 11/18/2010	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
69	X	Emails between Lucretia Scoufos and Doug McMillan titled "RE: Tudor lawsuit," last email in chain dated 4/8/2015	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
70	X	Emails between Claire Stubblefield and Doug McMillan titled "RE: Tudor lawsuit," last email in chain dated 4/8/2015	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants

			reserve the right to supplement these objections when document is properly identified.
71		Emails between Charlie Babb and Sheridan McCaffree titled "Re: Intervenor's discovery," last email in chain dated 5/17/2016	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
72		Emails between Sheridan McCaffree, Andrew Tevington and Charlie Babb titled "RE: last draft," last email in chain dated 3/16/2015	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
73	X	Emails between Sheridan McCaffree and Terri Rodgers titled "RE: Rachel Tudor inquiries," last email in chain dated 7/7/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct

			4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
74	X	Emails between Sheridan McCaffree and Richard Ogden titled "RE: RUSO," last email in chain dated 7/25/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
75		Emails between Richard Ogden and Sheridan McCaffree titled "RE: Southeastern – this was never sent to cb," last email in chain dated 7/23/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when

			document is properly identified.
76	X	Emails between Richard Ogden and Sheridan McCaffree titled "RE: Southeastern," last email in chain dated 5/16/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
77	X	Emails between Richard Ogden and Sheridan McCaffree titled "RE: Southeastern," last email in chain dated 5/16/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
78		Emails between Sheridan McCaffree, Richard Ogden and Charlie Babb titled "RE: The Discrimination...," last email in chain dated 4/27/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i>

			dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
79		Emails between Sheridan McCaffree and Richard Ogden titled "RE: The Discrimination..." last email in chain dated 4/29/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
80		Emails between Sheridan McCaffree and Richard Ogden titled "Re" Tudor," last email in chain dated 5/24/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.

81	X	Emails between Claire Stubblefield and Charlie Babb titled "Tudor Case," last email in chain dated 10/4/2011	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
82		Email from Claire Stubblefield to Claire Stubblefield titled "Tudor Complaint," dated 9/1/2010	Fed. R. Evid. 401, 402, 403, 502, 801, 802, 901; Fed. R. Civ. P. 26(5)(b); Rules of Prof. Conduct 4.4; Tudor's counsel should not have these documents. <i>See Order</i> dated June 15, 2016 [Doc. 66]; Improper Exhibit, Improperly identified; Defendants reserve the right to supplement these objections when document is properly identified.
83	X	1/13/2004 Appointment Letter: College of the Mainland for 2003-2004 (PI00447)	Fed. R. Evid. 901
84	X	5/18/2004 Appointment Letter: Southeastern Oklahoma State University for 2004-2005 (PI00448)	Fed. R. Evid. 901
85	X	Tudor's Southeastern Oklahoma State University Payroll Advice for 01/01/2011 – 01/31/2011 (PI00448)	Fed. R. Evid. 901

86	X	Southeastern Oklahoma State University: Salary Calculation Form 2011-12, Full-Time Faculty and Guide (PI000450 – PI000451)	Fed. R. Evid. 901
87	X	8/30/2013 Salary Letter: Collin College for 2013-2014 (PI000453)	Fed. R. Evid. 901
88	X	9/3/2014 Salary Letter: Collin College for 2014-2015 (PI000454)	Fed. R. Evid. 901
89	X	Collin College Full-Time Faculty Contract for 2015-2016 (PI000455 – PI000456)	Fed. R. Evid. 901
90	X	Collin College Electronic Pay stub for pay period 1/1/2013 to 1/31/2013 (PI002045)	Fed. R. Evid. 901
91	X	Collin College Full-Time Faculty Contract for 2015-2016 (PI002044 – PI002045)	Fed. R. Evid. 901
92	X	Tudor Federal Income Tax Returns 2011 (PI000434 – PI000436)	
93	X	Tudor Federal Income Tax Returns 2012 (PI000437 - PI000449)	
94	X	Tudor Federal Income Tax Returns 2013 (PI000441 - PI000443)	
95	X	Tudor Federal Income Tax Returns 2014 (PI000444 - PI000445)	
96	X	Humana Dental Claim Receipt (PI000457 – PI-000460)	Fed. R. Evid. 401, 402, 403, 801, 802, 901; Improper Exhibit, Tudor has no health benefits claim
97	X	Southeastern Oklahoma State University Self-Study Report submitted to the Higher Learning Commission (DOJ000331 – DOJ000548)	Fed. R. Evid. 401, 402, 403, 801, 802, 901
98	X	Tudor Chickasaw Nation Tribal Citizenship Identification Card (PI002035)	Fed. R. Evid. 401, 402, 403

99	X	Online Petition to “Reinstate Dr. Rachel Tudor” (PI000815 – PI001100)	Fed. R. Evid. 401, 402, 403, 801, 802, 901
100	X	9/5/2011 Blog Entry: “Open Letter to Petition Signers” (PI00110 – PI00111)	Fed. R. Evid. 401, 402, 403, 801, 802, 901
101	X	5/30/2011 Blog Entry: “Scholarship Record” (PI001126 – PI001131)	Fed. R. Evid. 401, 402, 403, 801, 802, 901
102	X	5/29/2011 Blog Entry: “Reason is the Surest Safeguard Against Tyranny” (PI001132 – PI001138)	Fed. R. Evid. 401, 402, 403, 801, 802, 901
103	X	4/26/2011 Blog Entry: “Award for Excellence in Scholarship (PI001141 – PI001142)	Fed. R. Evid. 401, 402, 403, 801, 802, 901
104		4/24/2011 Blog Entry: “Petition” (PI001143 – PI001144)	Fed. R. Evid. 401, 402, 403, 801, 802, 901
105		4/20/2011 Blog Entry: “Why This Blog?” (PI001145 – PI001146)	Fed. R. Evid. 401, 402, 403, 801, 802, 901
106		4/18/2011 Blog Entry: “Southeastern Oklahoma State University” (PI001147 – PI001150)	Fed. R. Evid. 401, 402, 403, 801, 802, 901
107	X	2/15/2012 Blog Entry: “LinkedIn” (PI001169)	Fed. R. Evid. 401, 402, 403, 801, 802, 901
108		1/1/2012 Blog Entry: “Best Wishes for a More Just Year” (PI001174 – PI001175)	Fed. R. Evid. 401, 402, 403, 801, 802, 901

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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of August 2017, 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:

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