

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

UNITED STATES OF AMERICA,

Plaintiff,

RACHEL TUDOR,

Plaintiff/Intervenor,

v.

**Case No. 15-cv-324-C**

SOUTHEASTERN OKLAHOMA STATE  
UNIVERSITY, and

THE REGIONAL UNIVERSITY SYSTEM  
OF OKLAHOMA,

Defendants.

**UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE RESPONSE  
BRIEF IN OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL  
PRODUCTION OF ELECTRONICALLY STORED INFORMATION**

Pursuant to Local Rule 7.1, Defendants Southeastern Oklahoma State University ("Southeastern") and the Regional University System of Oklahoma ("RUSO") (collectively "Defendants") respectfully request that the Court extend by six (6) days (until Monday, September 11, 2017), the deadline for Defendants to file their response brief(s) in opposition to Plaintiff United States of America's ("USA") Motion to Compel Production of ESI Withheld on the Basis of Privilege. Plaintiff USA does not oppose this motion.

1. USA filed its Motion to Compel on August 14, 2017. [Doc. 146].
2. Pursuant to Local Rule 7.1(i), the Defendants' response brief in opposition to Defendant RUSO's motion to compel is currently due Tuesday, September 5, 2017.

3. USA and Defendants have entered into a settlement agreement, and have requested that Plaintiff/Intervenor (“Tudor”) join in the filing of a Joint Stipulation of Dismissal.

4. While Tudor is considering options in that regard, Defendants’ Response brief will be due the day after the Labor Day holiday weekend. In the interest of conservation of taxpayer and judicial resources, Defendants seek an extension of their response time in the hopes that such briefing will become moot with the filing of either a joint stipulation of dismissal, or a motion to dismiss with prejudice. It is anticipated that a joint stipulation of dismissal, or a motion to dismiss with prejudice could be filed on September 7, 2017.

5. Thus, Defendants ask that the present deadline for responding to USA’s Motion to Compel Production of ESI be extended past September 7, 2017 to Monday, September 11, 2017.

6. Counsel for USA has been contacted about this request, and has no objection.

7. This is the first request for an extension of this particular deadline, and the extension of this deadline would not affect any other deadlines in this case.

For the foregoing reasons, Defendants respectfully request that the Court grant this extension of time.

Respectfully submitted,

/s/ Jeb E. Joseph

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 1st day of September 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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