

**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.)	

**STIPULATION AND JOINT MOTION FOR DISMISSAL OF PLAINTIFF
UNITED STATES' COMPLAINT WITH PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a)(2), Plaintiff United States (“United States”) and Defendants Southeastern Oklahoma State University and the Regional University System of Oklahoma (collectively “Defendants”), hereby stipulate and jointly move to dismiss with prejudice the Complaint of the United States (ECF No. 1) in this case due to a settlement between the United States and Defendants. Plaintiff-Intervenor Dr. Rachel Tudor (“Dr. Tudor”) is not a party to the settlement, or this stipulation and joint motion, and her Complaint-in-Intervention (ECF No. 24) would not be reached by this dismissal. Counsel for Dr. Tudor has advised counsel for the United States that she opposes the dismissal.

The United States will file a separate brief in support of this Motion. A joint proposed order granting this Motion and entering the requested dismissal is submitted separately herewith.

Respectfully submitted,

Date: September 7, 2017

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(Signed by Valerie L. Meyer with permission of Dixie
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*Attorneys for Defendants Southeastern Oklahoma
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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: September 7, 2017 /s/Valerie L. Meyer