

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

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
and	)	
	)	
DR. RACHEL TUDOR,	)	
	)	
Plaintiff/Intervenor,	)	
	)	
v.	)	Case No. 5:15-CV-00324-C
	)	
SOUTHEASTERN OKLAHOMA	)	
STATE UNIVERSITY,	)	
	)	
and	)	
	)	
THE REGIONAL UNIVERSITY	)	
SYSTEM OF OKLAHOMA,	)	
	)	
	)	
Defendants.	)	

**DR. TUDOR’S OBJECTIONS TO  
DEFENDANTS’ FINAL EXHIBIT LIST**

Plaintiff/Intervenor Dr. Rachel Tudor submits the following objections to Defendants’ Final Exhibit List (ECF Doc. 114) in accordance with the Court’s Revised Scheduling Order (ECF Doc. 142).

**General Objections**

Dr. Tudor generally objects that Defendants’ Final Exhibit List does not denote which exhibits Defendants are likely to use at trial. *See Original*

Scheduling Order, ECF Doc. 39 at 1 (setting original due dates for party exhibit lists and indicating that “The list of witnesses and exhibits shall separately state those expected to be called or used and those which may be called or use it [*sic.*] the need arises.”

### Specific Objections

NO.	DOCUMENT	OBJECTION
1	Memorandum from Doug McMillan to Rachel Tudor dated 10/5/2012 RE: Application for Tenure (DEF27)	The header on this document is a hearsay statement from the EEOC. Also, because the header is not an original part of the document, the version of this document with the header does not satisfy FRE 1003 since it is not a duplicate. Tudor would not object to this exhibit if the header were redacted.
2	Memorandum from Doug McMillan to Charla Hall and Bryon Clark dated 10/19/2010 RE: Tudor Grievance (DEF28-31)(Plaintiff's Depo Exhibit #129)	The Bates numbers do not match the document described. Tudor has no objection to the admissibility of Plaintiff's Deposition Exhibit 129 but the documents Bates numbered DEF28-31 are not the same as Plaintiff's Deposition Exhibit 129.
3	Notice of Appeal to Lawrence Minks dated 2/26/2010 (DEF1754-1456)(Plaintiff's Depo Exhibit #46)	Tudor has no objection to the admissibility of Plaintiff's Deposition Exhibit 46 but the Bates numbers identified do not correspond with Plaintiff's Deposition Exhibit 46. Plaintiff's Deposition Exhibit 46 is Bates numbered EEOC927-929.
4	Administration's Response to Notice of Appeal dated 4/29/2010 (DEF35-36)	The header on this document is a hearsay statement from the EEOC. Also, because the header is not an original part of the document, the version of this document with the header does not satisfy FRE 1003 since it is not a duplicate. Tudor would not object to this exhibit if the header were redacted.
5	Doug McMillan letter to Rachel Tudor dated 4/30/2010 RE: Denial of Application for	The header on this document is a hearsay statement from the EEOC. Also, because the header is not an original part of the document, the

	Tenure and Promotion (DEF37-38)(Plaintiff's Depo Exhibit #102)	version of this document with the header does not satisfy FRE 1003 since it is not a duplicate. Tudor would not object to this exhibit if the header were redacted.
6	Memorandum from Charla Hall, James Knapp, Larry Prather to Rachel Tudor dated 9/30/2010; Copied to: Larry Minks, Doug McMillan, Charles Weiner; Bryon Clark and Randy Prus RE: Grievance (DEF5192)	
7	Grievance dated 10/11/2010 (DEF49-64)(Plaintiff's Depo Exhibit #15)	The Bates numbers do not match the document described. Tudor has no objection to the admissibility of Plaintiff's Deposition Exhibit 15 but the documents Bates numbered DEF49-64 are not the same as Plaintiff's Deposition Exhibit 129.
8	Memorandum from Ross Walkup to Rachel Tudor, Doug McMillan and Charla Hall dated 1/3/2011 RE: Grievance filed 10/11/2011(DEF65-68)(Attachment to Memo is Plaintiff's Depo Exhibit #74)	The Bates numbers do not match the document described. Tudor has no objection to the admissibility of Plaintiff's Deposition Exhibit 74 but the documents Bates numbered DEF65-68 are not the same as Plaintiff's Deposition Exhibit 129.  Additionally, the header on DEF65-68 (which does not appear in Plaintiff's Deposition Exhibit 74) is a hearsay statement from the EEOC. Also, because the header is not an original part of the document, the version of this document with the header does not satisfy FRE 1003 since it is not a duplicate. Tudor would not object to this exhibit if the header were redacted.
9	Non-Renewal Letter dated 2/22/2011 (DEF1464)	The Bates number does not correspond to the exhibit described here. Tudor needs to know which document Defendants intend to use as an exhibit.
10	Letter from Bryon Clark to Rachel Tudor dated 3/4/2011 RE: Appeal (DEF76-80)	The header on this document is a hearsay statement from the EEOC. Also, because the header is not an original part of the document, the version of this document with the header does not satisfy FRE 1003 since it is not a duplicate. Tudor

		would not object to this exhibit if the header were redacted.
11	Document prepared by James L. Knapp dated 9/23/2010 RE: Grievance (DEF144)(Plaintiff's Depo Exhibit #71)	
12	DOE letters to Barbara Seely, Larry Minks and Rachel Tudor dated 10/12/2010 RE: OCR Docket #07102099 (DEF170-175)	The handwriting at the top of the document Bates numbered DEF221 is a hearsay statement from an unknown source. Also, because the handwriting is not an original part of the document, the version of this document with the handwriting does not satisfy FRE 1003 since it is not a duplicate. Tudor would not object to this exhibit if the handwriting were redacted.
13	Memorandum from Doug McMillan to Rachel Tudor dated 10/5/2010 RE: Application for Tenure and Promotion during the 2010-2011 Academic Year (DEF221)(Plaintiff's Depo Exhibit #107)	The Bates numbers do not match the document described. Plaintiff's Exhibit 107 bears Bates mark DEF5188.  Additionally, the header on the document Bates numbered DEF221 is a hearsay statement from the EEOC. Also, because the header is not an original part of the document, the version of this document with the header does not satisfy FRE 1003 since it is not a duplicate. Tudor would not object to this exhibit if the header were redacted or, alternatively, if Plaintiff's Deposition Exhibit 107 (DEF5188) were used instead.
14	RUSO Policy Manual (DEF254-366)	The header on this document is a hearsay statement from the EEOC. Also, because the header is not an original part of the document, the version of this document with the header does not satisfy FRE 1003 since it is not a duplicate. Tudor would not object to this exhibit if the header were redacted.
15	SEOSU Academic Policies and Procedures (DEF367-516)	The header on this document is a hearsay statement from the EEOC. Also, because the header is not an original part of the document, the version of this document with the header does not satisfy FRE 1003 since it is not a duplicate. Tudor would not object to this exhibit if the header were redacted.

16	SEOSU Sexual Harassment Policy (DEF524-526)	This Bates range contains more than just the Sexual Harassment Policy. Tudor does not, however, object to the admissibility of any documents within the Bates range DEF525-526.
17	SEOSU Nondiscrimination Equal Opportunity Affirmative Action Policy (DEF528)	
18	SEOSU Retaliation Policy (DEF529-530)	This Bates range contains more than just the Retaliation Policy. Tudor does not, however, object to the admissibility of the document within the Bates marked DEF526.
19	SEOSU Tenure and Promotion Policy (DEF606-708)	This Bates range contains more than just the SEOSU Tenure and Promotion Policy.  Tudor would not object if Plaintiff's Deposition Exhibit 7 (EEOC303-349) were used instead.
20	SEOSU Religion and EHL Faculty Policy (DEF709-710)	This document is not a policy. Defendants prepared it and submitted to the EEOC in response to a request from the EEOC in connection with its investigation of Dr. Tudor's charge of discrimination. The document is hearsay.
21	Rachel Tudor File from Human Resources (including I-9, Garnishment and Unemployment documents as produced to EEOC (DEF712-1012)	Unemployment insurance docs (DEF773-820) are irrelevant, prejudicial, and some are hearsay; garnishment docs (DEF929-1012) are irrelevant, prejudicial, and hearsay.
22	Lucretia Scoufos email to Rachel Tudor dated 8/25/2009 RE: Tenure – with Dr. Scoufos' handwritten notes (DEF1014-1015)	
23	Documents sent to SEOSU by DOE (DEF1301-1309)	The header on this document (upper left hand corner, reading "Attachment 1") is a hearsay statement from an unknown source. Also, because the header is not an original part of the document, the version of this document with the header does not satisfy FRE 1003 since it is not a duplicate. Tudor would not object to this exhibit if the header were redacted.

24	SEOSU Orientation of New Faculty, Agenda and Sample Handouts (DEF1311-1460) (Contains Plaintiff's Depo Exhibits #s 21, 40)	This Bates range contains more than just orientation materials. Tudor does not, however, object to the admissibility of any documents within the Bates range DEF1311-1460.
25	Timeline of Affirmative Action Officer at SEOSU (DEF1463-1466)(Plaintiff's Depo Exhibit #112)	
26	Memorandum from Cathy Conway to Claire Stubblefield dated 8/15/2011 RE: EEOC Request for Information on Dr. Rachel Tudor Discrimination Charges (DEF1468)	Defendants created this document in response to a request from the EEOC. The document describes complaints of other employees, who are not witnesses in this case, that are irrelevant and potentially confusing to the jury. Tudor objects under FRE 402 and 403. Plaintiff also objects to this exhibit because it is hearsay.
27	Memorandum from Doug McMillan to William Fridley dated 4/30/2010 RE: Denial of Application for Tenure and Promotion (DEF1727-1728)	This exhibit is irrelevant and potentially confusing to the jury and should be excluded under FRE 402 and/or FRE 403.
28	Memorandum from Doug McMillan to Rachel Tudor dated 2/15/2010 RE: Notification of Promotion Status (DEF1753)	This version of the document (DEF1753) has a cryptic handwritten notation at the top that could be potentially confusing to the jury. Tudor, thus, objects under FRE 403 but would not object to a different version of this exhibit, without this notation, such as the version of this document that the Defendants have identified as Exhibit 130.
29	Memorandum to Dr. Weiner from James Knapp, Larry Prather and Jon Reid dated 3/25/2010 RE: Appeal of Dr. Rachel Tudor (DEF1757)(Plaintiff's Depo Exhibit #47)	The Bates numbers do not match the document described. Tudor has no objection to the admissibility of Plaintiff's Deposition Exhibit 47 (DEF5125).
30	Memorandum from Larry Minks to Rachel Tudor dated 4/21/2010 RE: Application for Tenure and Promotion to Associate Professor	This Bates number does not match the description of the document. If the Defendants intended to identify the document Bates numbered DEF4771, Tudor has no objection to

	(DEF1462)	the admissibility of that document.
31	Letter from Larry Minks to Rachel Tudor dated 3/25/2011 RE: Appeal Review regarding the rejection of Dr. Tudor's Tenure and Promotion Application (DEF1463).	This Bates number does not match the description of the document. If the Defendants intended to identify Plaintiff's Deposition Exhibit 77 (DEF5687), Tudor has no objection to the admissibility of that document.
32	SEOSU Position Statement (DEF1779-1785)(Plaintiff's Depo Exhibit #30)	Tudor has no objection to the admissibility of Plaintiff's Deposition Exhibit 30 (DEF5279-5286), but requests that the Defendants correct the bates range cited in their exhibit list to avoid confusion.
33	Schematic of Morrison Building (DEF1787-1789)(Plaintiff's Depo Exhibit #27)	
34	Findings and Conclusions on Gender Discrimination Complaint from Claire Stubblefield to Rachel Tudor dated 1/19/2011 (DEF1795-1801) (Plaintiff's Depo Exhibit #19)	The document described is Plaintiff's Deposition Exhibit 17, not 19. Tudor has no objection to the admissibility of Plaintiff's Deposition Exhibit 17 or 19 but requests that the Defendants correct this error in their exhibit list to avoid confusion.
35	Memorandum from Ross Walkup to Rachel Tudor, Doug McMillan, Charla Hall dated 1/3/2011 RE: Grievance filed 10/11/2010 (DEF5668-5671)	
36	SEOSU Faculty Promotion and Tenure Evaluation Summary – Confidential Analysis Worksheet for Rachel Tudor signed by Lucretia Scoufos dated 1/14/2010 (DEF5075-5076)(Plaintiff's Depo Exhibit #126)	Tudor has no objection to the admissibility of Plaintiff's Deposition Exhibit 126 (EEOC857-858), but requests that the Defendants correct the bates range cited in their exhibit list to avoid confusion.
37	Paula Smith Allen email to John Mischo dated 11/3/2008 RE:	This document is irrelevant, unfairly prejudicial, and potentially confusing and should be excluded under FRE

	Tenure and Promotion of Dr. Tudor (DEF5077)	402 and/or 403.
38	Lucretia Scoufos email to Ross Walkup dated 1/3/2011 RE: FW: Tenure and Promotion Report (DEF5078)(Plaintiff's Depo Exhibit #148)	The document described is not Plaintiff's Deposition Exhibit 148. Tudor has no objection to the admissibility of Plaintiff's Deposition Exhibit 148 or to the document described here (which is Bates numbered DEF5078) but Tudor requests that the Defendants amend this entry on their exhibit list to avoid confusion.
39	Acknowledgement of Receipt dated 10/7/2010 of Memorandum from Doug McMillan dated 10/5/2010 with Handwritten note of Lucretia Scoufos that Rachel Tudor refused to sign in the presence of Randy Prus (DEF5079)	
40	Portfolio Transmittal Form for Rachel Tudor dated 10/15/2009 and signed as reviewed by Lisa Coleman on 11/18/09; John Mischo on 11/29/09; Lucretia Scoufos on 1/14/2010; and Doug McMillan on 2/10/2010 (DEF5080)	
41	Rachel Tudor email to Doug McMillan and copy to John Mischo dated 2/19/2010 RE: Tenure; ATTACHMENT: Letter to Doug McMillan from Rachel Tudor (DEF5095-5097)	
42	Email string between Doug McMillan to Rachel Tudor and Lucretia Scoufos dated 2/19/2010 RE: Tenure (DEF5098-5107)	The document description does not match the Bates range. There is an email string dated 2/19/2010 at DEF5098-5100 but the other documents in the identified Bates range are not part of that email string.
43	Rachel Tudor email to Lucretia Scoufos and copy to John Mischo dated 2/19/2010 RE: Tenure;	The document described is Plaintiff's Deposition Exhibit 96, not 97. Tudor does not object to the admissibility of Plaintiff's Deposition Exhibits 96

	ATTACHMENT: Scoufos.docx (DEF5108-5110)(Plaintiff's Depo Exhibits #96 and #97)	and 97 but requests that Defendants clarify which document they intend to mark as Defendants' Exhibit 43.
44	Acknowledgment of Receipt of 4/29/2010 letter from Charles Weiner dated 4/29/2010 RE: Decision Rendered by Faculty Appellate Committee (DEF5122)	
45	Charles Weiner letter to Rachel Tudor dated 4/29/2010 RE: Decision Rendered by Faculty Appellate Committee (DEF5123-5124)(Plaintiff's Depo Exhibit #45)	Tudor has no objection to the admissibility of Plaintiff's Deposition Exhibit 45 (EEOC183-908), but requests that the Defendants correct the Bates range cited in their exhibit list to avoid confusion.
46	Bryon Clark email to Rachel Tudor; Copied to: Doug McMillan; Ross Walkup; Charla Hall; James Knapp; Larry Prather dated 2/11/2011 RE: Response to 7 Feb. 2011 e-mail ATTACH: Addition to Grievance Policy 24 Jan 2011; Grievance Policy Section 4.4.6 APPM; Tudor Grievance dated 11 October 2010; Response to Policy Change (DEF5156-5127)	The Bates range does not match the document description. If the Defendants intended to identify documents Bates numbered DEF5156-5157, Tudor would have no objection.
47	Memorandum from Bryon Clark to Doug McMillan dated 2/22/2011 RE: Appeal of Faculty Appellate Committee's Recommendation in the Rachel Tudor Grievance Concerning the 2010-2011 Decision not to Allow her Application for Tenure and Promotion (DEF5158)(Plaintiff's Depo Exhibit #75)	Tudor has no objection to the admissibility of Plaintiff's Deposition Exhibit 75 (DEF1331), but requests that the Defendants correct the bates range cited in their exhibit list to avoid confusion.

48	Rachel Tudor email to Bryon Clark dated 3/4/2011 attaching 3/4/2011 Appeal RE: Appeal (DEF5159-5164)(Plaintiff's Depo Exhibit #76)	Tudor has no objection to the admissibility of Plaintiff's Deposition Exhibit 76 (DEF1332-1337), but requests that the Defendants correct the Bates range cited in their exhibit list to avoid confusion.
49	Rachel Tudor letter to Larry Minks; Copied to: Randy Prus dated 8/30/2010 RE: Improprieties and Due Process Policy Violations by Administrators in Tenure and Promotion Process (DEF5617-5634)(Plaintiff's Depo Exhibit #56)	Tudor has no objection to the admissibility of Plaintiff's Deposition Exhibit 56 (DEF1158-1175), but requests that the Defendants correct the Bates range cited in their exhibit list to avoid confusion.
50	Lucretia Scoufos email to Doug McMillan dated 10/7/2010 RE: Rachel Tudor (DEF5189)(Plaintiff's Depo Exhibit #14)	Tudor has no objection to the admissibility of Plaintiff's Deposition Exhibit 14 (DEF1148-1150), but requests that the Defendants correct the Bates range cited in their exhibit list to avoid confusion.
51	Complaint from Rachel Tudor to Claire Stubblefield; Copied to: Randy Prus; dated 8/30/2010 (DEF8213-5218)	There appears to be a typo in the Bates range. If the Defendants intended to identify the documents Bates numbered DEF5213-5218, Tudor has no objection.
52	Rachel Tudor email to Bryon Clark dated 2/7/2011 RE: Response to Policy Change ATTACH: Amended Faculty Grievance Policy (DEF5256-5258)	
53	Lucretia Scoufos email to Ross Walkup dated 1/3/2011 RE: Rachel Tudor's AY 2009-10 Departmental File (DEF5266)	
54	Lucretia Scoufos email to Lisa Coleman dated 5/9/2011 RE: FW: Tenure and Promotion Report (DEF5287)	
55	William Fridley email string with Kenneth Chinn dated 5/9/2011 RE: Rachel Tudor (DEF5288-5293)	The description of the 5/9/2011 email's subject line is inaccurate. Additionally, the Bates range cited contains documents other than the email chain described. Tudor has no

		objection to the admissibility of DEF5288-5293, but requests that the Defendants correct the description cited in their exhibit list to avoid confusion.
56	William Fridley letter to Kathy Nusz dated 4/8/2012 RE: EEOC Request for Faculty Senate Documentation Pertaining to Dr. Tudor (DEF5317)	
57	Charles Weiner, Rachel Tudor email string dated 3/4/2010 RE: Faculty Appeal (DEF5320)	
58	Larry Minks letter to Rachel Tudor dated 3/25/2011 RE: Appeal Review regarding the rejection of Dr. Tudor's Tenure and Promotion Application (DEF5321)(Plaintiff's Depo Exhibit #77)	Tudor has no objection to the admissibility of Plaintiff's Deposition Exhibit 77 (DEF5687), but requests that the Defendants correct the bates range cited in their exhibit list to avoid confusion.
59	Rachel Tudor letter to Lucretia Scoufos dated 4/6/2010 RE: Offer with handwritten notes by Lucretia Scoufos dated 4/7/2010 (EEOC914)(Plaintiff's Depo Exhibit #151)	
60	Larry Minks Memorandum to Rachel Tudor dated 4/21/2010 RE: Application for Tenure and Promotion to Associate Professor (DEF5327)	This appears to be duplicative to Exhibit 30 (which Tudor suggests, above, that Defendants correct to the document Bates numbered DEF4771). Tudor has no objection to the admissibility of DEF4771.
61	Rachel Tudor letter titled "In re: Dr. Weiner's letter" (DEF5328)	
62	Charles Weiner letter to Rachel Tudor dated 4/29/2010 (DEF5329-5330)	This is duplicative of Exhibit 45.
63	Rachel Tudor letter to Larry Minks dated 5/7/2010 RE: Appeal (DEF5331)(Plaintiff's Depo Exhibit #54)	Tudor has no objection to the admissibility of Plaintiff's Deposition Exhibit 54 (EEOC185), but requests that the Defendants correct the bates range cited in their exhibit list

		to avoid confusion.
64	Rachel Tudor email to William Fridley; Christopher Moretti; Dennis Brewster; George Jacox; Halet Poovey dated 11/9/2010 (DEF5332)	
65	DOE letter to Larry Minks dated 10/12/2010 RE: OCR Docket #07102099 (DEF5333-5342)	The Bates range does not match the document described. If the Defendants intend to offer the document Bates numbered DEF5335-5342, Tudor does not object.
66	EEOC letter to Charles Babb dated 3/14/2013 RE: Rachel Tudor v. SEOSU – EEOC Charge Number: 564-2011-00849 (DEF5345-5346)	This document was written in the context of settlement negotiations during the EEOC’s conciliation process. It is also irrelevant and potentially confusing. Thus, it is inadmissible under FRE 402, 403, and/or 408. This version of the document also has unidentified highlighting and handwriting that is hearsay.
67	Claire Stubblefield memo to Lucretia Scoufos dated 8/3/2011 RE: Important Information Regarding EEOC Charge attaching Document Retention Notice Pursuant to Charge of Discrimination (DEF5348-5351)(Attachment is Plaintiff’s Depo Exhibits #20; #35; #113)	Tudor has no objection to the admissibility of Plaintiff’s Deposition Exhibit 20 (DEF1106-1107) and Plaintiff’s Deposition Exhibit 35 (DEF1106-1107), which are the same document. Similarly, Tudor does not object to the admissibility of Plaintiff’s Deposition Exhibit 113 (EEOC825-829). However, Tudor requests that the Defendants correct the bates range cited in their exhibit list to avoid confusion.
68	Bryon Clark email to Rachel Tudor; Doug McMillan dated 1/31/2011 RE: Tudor Grievance dated 10/11/2010 (DEF5361)(Plaintiff’s Depo Exhibit #72)	Tudor has no objection to the admissibility of Plaintiff’s Deposition Exhibit 72 (DEF5672), but requests that the Defendants correct the bates range cited in their exhibit list to avoid confusion.
69	Bryan Clark – Rachel Tudor email string dated 2/14/2011 RE: Response to 2/7/2011 email with attachments (DEF5365-5373)	There is a typo in the description of this exhibit; Tudor requests that Defendants correct the description with the proper spelling of Bryon Clark’s name to avoid confusion.
70	Larry Minks letter to Rachel Tudor dated 2/21/2011 RE: Appeal of the Findings and	Tudor has no objection to the admissibility of Plaintiff’s Deposition Exhibit 132 (DEF1300), but requests that the Defendants correct the

	Conclusions on Gender Discrimination Complaint (DEF5386)(Plaintiff's Depo Exhibit #132)	Bates range cited in their exhibit list to avoid confusion.
71	Complaint by Rachel Tudor dated 8/30/2010 (DEF5388-5394)(First 6 pages of Plaintiff's Depo Exhibit #55)	Tudor has no objection to the admissibility of the first six pages of Plaintiff's Exhibit 55 (DEF1279-1284), but requests that Defendants correct the Bates range cited in their exhibit list to avoid confusion.
72	Claire Stubblefield letter to Rachel Tudor RE: Receipt of Complaint (DEF5396)	The document description does not match the Bates range.
73	Rachel Tudor letter to Claire Stubblefield dated 10/13/2010 RE: Additional Information (DEF5397-5399)(Plaintiff's Depo Exhibit #108)	Tudor has no objection to the admissibility of Plaintiff's Exhibit 108 (EEOC37-39), but requests that Defendants correct the Bates range cited in their exhibit list to avoid confusion.
74	Amended Complaint by Rachel Tudor dated 10/28/2010 (DEF5400-5406)(Plaintiff's Depo Exhibit 110)	Tudor has no objection to the admissibility of Plaintiff's Exhibit 110 (DEF1290-1296), but requests that Defendants correct the Bates range cited in their exhibit list to avoid confusion.
75	Rachel Tudor letter to Larry Minks dated 1/28/2011 RE: Appeal of Dr. Stubblefield's Findings and Conclusions on Gender Discrimination Complaint (DEF5407-5409)(Plaintiff's Depo Exhibit #131)	Tudor has no objection to the admissibility of Plaintiff's Exhibit 131 (DEF1297-1299), but requests that Defendants correct the Bates range cited in their exhibit list to avoid confusion.
76	Charles Weiner-Rachel Tudor email string dated 9/16/2010 FW: Faculty Appeal (DEF5420-5423)(Plaintiff's Depo Exhibit #57)	Tudor has no objection to the admissibility of Plaintiff's Exhibit 57 (EEOC31-33), but requests that Defendants correct the Bates range cited in their exhibit list to avoid confusion.
77	Lurcretia Scoufos letter to Doug McMillan dated 1/12/2010 RE: Recommendation to deny tenure and to give Rachel Tudor, a one-year termination appointment at the rank of Assistant Professor in the	There are typos in the description of this exhibit. Tudor requests that Defendants correct the description with the proper spelling of Lucretia Scoufos's name to avoid confusion. Tudor also requests that the title of the email be corrected to read: "RE: Recommendation to deny tenure and to give Rachel J. Tudor, Ph.D., a one-

	Department of English, Humanities and Languages for the 2010-2011 Academic Year (DEF5424)(Plaintiff's Depo Exhibit #100)	year terminal appointment at the rank of Assistant Professor in the Department of English, Humanities and Languages for the 2010-2011 Academic Year.”  Additionally, Tudor has no objection to the admissibility of Plaintiff's Exhibit 100 (DOJ150), but requests that Defendants correct the Bates range cited in their exhibit list to avoid confusion.
78	Rachel Tudor email to Claire Stubblefield dated 10/7/2010 RE: Retaliation (DEF5426)(Plaintiff's Depo Exhibit #105)	Tudor has no objection to the admissibility of Plaintiff's Exhibit 105 (EEOC36), but requests that Defendants correct the Bates range cited in their exhibit list to avoid confusion.
79	Virginia Parrish email to Claire Stubblefield dated 11/16/2010 RE: Tenure and Promotion Portfolio (DEF5451-5152)	This Bates range appears to have a typographical error. If Defendants intended the Bates range to be DEF5451-5452, Tudor has no objection to this exhibit.
80	Lucretia Scoufos email to Doug McMillan dated 11/30/2010 FW: Article with attachment (DEF5453-5464)(Portion of Plaintiff's Depo Exhibit #101)	Tudor has no objection to the admissibility of Plaintiff's Exhibit 101 (EEOC63-64), but requests that Defendants correct the Bates range cited in their exhibit list to avoid confusion.
81	Rachel Tudor email to Claire Stubblefield dated 9/14/2010 RE: Scoufos Letter (DEF5467)	
82	Sample Application Portfolio for Promotion to Associate Professor Rank with Tenure Status (DEF5835-5846)	
83		This entry is left blank on Defendants' Final Exhibit List. See ECF Doc. 114 at 8.
84	Academic Policies and Procedures 2014-2015 (DEF5863-6029) Example to be used in the event injunctive relief is order.	
85	Academic Policies and	

	Procedures (DEF6030-6180)	
86	Temporary and Supplemental Salary Schedules 2011-2012 (DEF6183)	
87	Sexual Harassment Policy – Appendix C Source: Policy Manual of Board of RUSO, Sec. 4.6)(DEF6184-6185)(Plaintiff’s Depo Exhibit #34)	Tudor has no objection to the admissibility of Plaintiff’s Exhibit 34 (DEF6955-6956), but requests that Defendants correct the Bates range cited in their exhibit list to avoid confusion.
88	Faculty Development and Evaluation Criteria – Appendix D (DEF6186)	
89	Catalog of Faculty Development and Evaluation Criteria – Appendix B (DEF6187-6193)	There is a typo in the description of this exhibit; Tudor requests that Defendants correct the description to read “Catalog of Faculty Development and Evaluation Criteria – Appendix E” to avoid confusion.
90	Faculty Development Agreement – Appendix F (DEF6194)	
91	SEOSU Faculty Development and Evaluation Summary – Appendix G (DEF6195-6197)	
92	Portfolio Transmittal Form (DEF6203)	
93	Cathy Conway memo to Claire Stubblefield dated 8/16/2011 RE: EEOC Information Required – Dr. Rachel Tudor Transmittal of Copies of all documents in Charging Party’s Personnel File (6204)	There is a typo in Defendants’ Bates range for this exhibit; Tudor requests that Defendants correct it to DEF6204 to avoid confusion.
94	Benefit Programs for Employees of SEOSU (DEF6591-6623)	This Bates range contains more than just the Benefit Programs for Employees of SEOSU documents. Tudor does not, however, object to the admissibility of any documents within the Bates range DEF6591-6623.
95	Follow-Up Faculty Development Agreement 2005-2006 – School of Arts and Letters dated 9/8/2006	

	(DEF7183-7184)	
96	Follow-Up Faculty Development Agreement 2005-2006 – School of Arts and Letters dated 11/4/2005 (DEF7185-7186)(Plaintiff’s Depo Exhibit #81)	The description of this document is inaccurate. This is not a “Follow-Up” agreement. Other than this error in the description, Tudor does not object to this exhibit.
97	Faculty Development Follow-Up dated 9/15/2005 (DEF7187-7188)(Plaintiff’s Depo Exhibit #81)	This description is inaccurate. Additionally, Tudor has no objection to the admissibility of Plaintiff’s Exhibit 81 (EEOC801-804), but requests that Defendants correct the Bates range cited in their exhibit list to avoid confusion.
98	Follow-Up Faculty Development Agreement 2006-2007 – School of Arts and Letters dated 9/28/2007 (DEF7189-7191)(Plaintiff’s Depo Exhibit #82)	This description is inaccurate. Additionally, Tudor has no objection to the admissibility of Plaintiff’s Exhibit 82 (EEOC791-793), but requests that Defendants correct the Bates range cited in their exhibit list to avoid confusion.
99	Follow-Up Faculty Development Agreement 2006-2007 – School of Arts and Letters dated 9/8/2006 (DEF7192-7193)	This description is inaccurate.
100	Follow-Up Faculty Development Agreement 2007-2008 – School of Arts and Letters signed but not dated (DEF7197-7199)	This description is inaccurate.
101	SEOSU Faculty Development and Evaluation Summary for Rachel Tudor dated 10/30/2008 – Evaluation Period 2007-2008 (DEF7200-7201)(Plaintiff’s Depo Exhibit #83)	Tudor has no objection to the admissibility of Plaintiff’s Exhibit 83 (EEOC781-782), but requests that Defendants correct the Bates range cited in their exhibit list to avoid confusion.
102	Follow-Up Faculty Development Agreement 2007-2008 – School of Arts and Letters dated 9/28/2007 (DEF7202-7203)	This description is inaccurate.
103	Follow-Up Faculty	The description of this document is inaccurate because it is not a

	Development Agreement 2008-2009 – School of Arts and Letters dated 10/7/2008 (DEF7204-7205)	“Follow-Up” Faculty Development Agreement.
104	Faculty Promotion and Tenure Evaluation of Rachel Tudor (DEF7703-7704)(Plaintiff’s Depo Exhibit #127)	Tudor has no objection to the admissibility of Plaintiff’s Exhibit 127 (DEF7703-7704), but requests that Defendants correct the Bates range cited in their exhibit list to avoid confusion.
105	Screening Committee Packet for Faculty Positions at SEOSU (DEF7705-7730)	This packet is irrelevant and potentially confusing to the jury. The packet appears to have been created after the conclusion of Dr. Tudor’s employment at Southeastern based on the dates on some of the pages. Furthermore, the packet concerns the hiring process at Southeastern which is not at issue in this case. This packet should be excluded under FRE 402 and/or 403.
106	SEOSU Policy Presentation on Sexual Harassment (DEF7731-DEF7772)	
107	Sexual Harassment and Anti-Discrimination presentation (DEF7773-7809)	According to the first page of these presentation materials, they were prepared in 2015, long after Dr. Tudor stopped working at Southeastern. Thus, it should be excluded as irrelevant and potentially misleading under FRE 402 and/or 403.
108	Sexual Harassment Training for Greek Organizations (DEF7810-7830)	These training materials were prepared for Greek organizations and Greek organizations are not at issue in this case. Thus, these materials are irrelevant, could confuse the jury, and should be excluded under FRE 402 and/or 403.
109	Athletic Department Training Modules (DEF7831-7848)	This training module relates to Title IX and Southeastern’s athletic department. There is no Title IX claim in this case and nothing that occurred in the case relates to the athletic department. Thus, this training module is irrelevant, could confuse the jury, and should be excluded under FRE 402 and/or 403.
110	Title IX Overview for Mandatory Training (DEF7849-DEF7866)	Based on the content of these training materials, they were prepared in or after 2012 and Dr. Tudor separated from Southeastern

		in 2011. Furthermore, these materials relate to Title IX and there is no Title IX claim in this case. Thus, these materials are irrelevant, could confuse the jury, and should be excluded under FRE 402 and/or 403.
111	Title IX Primer for SE Campus Police (DEF7867-DEF7888)	These training materials cover Title IX and were designed for campus police. There is no Title IX claim in this case and the campus police were not involved in this case in any way. Thus, these training materials are irrelevant, could confuse the jury, and should be excluded under FRE 402 and/or 403.
112	ATIXA Campus Title IX Coordinator and Admin. Train. & Cert. Course (DEF7889-DEF8180)	
113	Title IX: A New ERA of Responsibility (DEF8181-DEF8204)	
114	Appreciating, Accepting, and Celebrating Differences Through Tolerance... DEF8205-DEF8229)	
115	HR Trainings Attended by Cathy Conway (DEF8830-DEF8833)(Plaintiff's Depo Exhibit #24)	
116	February 27, 2006 email from Cathy Conway re: test group Sexual Harassment Training (DEF8896-8897)	
117	April 5, 2006 email from Cathy Conway to group re: training (DEF8899-8901)(Plaintiff's Depo Exhibit #41)	
118	List of SE Sexual Harassment Training Presentation attendees (DEF8904-8910)(Plaintiff's Depo Exhibit #41)	
119	BLR's Human Resources	

	Training Presentations on Sexual Harassment (DEF8915-8946)(Plaintiff's Depo Exhibit #42)	
120	Academic Policies Final as of 11-11-04 (DEF10627-10796)	
121	Academic Policies Final as of 1/7/2005 (DEF9256-9426)	
122	Academic Policies Final as of 1/10/2005 (DEF9427-9597)	
123	Academic Policies Final as of 1/17/2005 (DEF9598-DEF9768)	
	Academic Policies Final as of 1/19/2005 (DEF9769-9940)	This entry on Defendants' exhibit list was erroneously not allocated an exhibit number. Tudor requests that Defendants correct this error in their exhibit list to avoid confusion.
124	Academic Policies Final as of 8/23/2005 (DEF9941-10113)	
125	Academic Policies Final as of 10/18/2005 (DEF10114-10287)	
126	Academic Policies and Procedures manual 10/31/2007 (DEF8954-9106)	
127	Academic Policies and Procedures manual 8/5/2008 (DEF9107-9225)	
128	Academic Policies and Procedures manual 2009-2010 (DEF10947-11094)	
129	Academic Policies and Procedures manual 2014-2015 (DEF11576-11742)	
130	Memorandum to Rachel Tudor from Doug McMillan dated 2/15/2010 RE: Notification of Promotion Status (DEF13001-13002)	This description is inaccurate. There is a document in this Bates range that is not the Memorandum.
131	Email from The Chronicle (DEF13016-13018)	This email is a newsletter that has no relation to this case. It also contains unfairly prejudicial content. It should be excluded under FRE 802 because it is hearsay; under FRE

		402 because it is irrelevant; and FRE 403 because it is unfairly prejudicial, could confuse the jury, and has no probative value.
132	Candidate's Letter in Support... with comments by Dr. Randy Prus (DEF13019-13023)(Plaintiff's Depo Exhibit #10)	
133	Documents received from schools cited by Intervenor as places to which post-SEOSU applications were made for employment (DEF13024-13449)	<p>Tudor objects to documents Bates numbered DEF13359-13409. These are documents related to Tudor's employment at Oklahoma University that pre-dates her employment at Southeastern. The documents should be excluded under FRE 402 and/or 403 because they are irrelevant, potentially confusing to the jury, and contain potentially prejudicial information. (Defendants produced two different sets of documents both Bates numbered DEF13024-13032. Tudor understands which set the Defendants intend to use as an exhibit based on the description they have provided but wants to note this Bates numbering error to avoid any confusion.)</p> <p>Tudor also objects to documents in the range DEF13024-13449 that are clearly unrelated to this case because they pertain to persons with a similar name to Tudor (and/or her previous names) but they clearly are not records pertinent to Tudor. For example: Ohio Christian University Documents (DEF13318-13329) and Moraine Valley Community College (DEF13353-13358) are both records of undergraduate students with similar names to Tudor but clearly not Tudor given their dates of attendance at these institutions.</p>
134	OU Additional Response to Subpoena Duces Tecum (DEF13629)	Tudor objects to documents Bates numbered DEF13629. These are documents related to Tudor's employment at Oklahoma University that pre-dates her employment at Southeastern. The documents should be excluded under FRE 402 and/or 403 because they are irrelevant, potentially confusing to the jury, and

		contain potentially prejudicial information.
135	CV – Rachel Tudor (DEF13630-13638)	
136	Handwritten note of Claire Stubblefield dated 10/26 (DEF13643)	
137	Legal Briefing: Respectful Workplace dated 3/6/2012 by Charlie Babb (DEF13647-13667)	These training materials relate to a training given after Dr. Tudor separated from Southeastern. Thus, they are irrelevant and potentially misleading. They should be excluded under FRE 402 and/or 403.
138	Legal Briefing: Helping Create a Respectful Workplace dated 4/19-20/2006 by Charlie Babb (DEF13668-13671)	
139	DOE letter to Larry Minks dated 9/15/2010 RE: OCR Docket #07102099 (DOE000003)	
140	Note regarding 6/1/2007 call with Dr. Tudor about policies (DOJ000009)	
141	Corie Delashaw letter to Tenure Review Committee RE: Dr. Rachel Tudor/Application for Tenure (DOJ000015)	
142	Louis Lopez email to Rachel Tudor dated 7/24/2013 copied to Allan Townsend RE: EEOC Charge at DOJ (DOJ000134)	This document is irrelevant and should be excluded under FRE 402.
143	Allan Townsend email to Rachel Tudor dated 8/13/2013 RE: EEOC Charge at DOJ (DOJ000135-136)	This document is irrelevant and should be excluded under FRE 402.
144	Rachel Tudor email to Allan Townsend dated 8/13/2013 RE: EEOC Charge at DOJ (DOJ000137-139)	This document is irrelevant and should be excluded under FRE 402.
145	Allan Townsend email to Rachel Tudor dated 8/13/2015 RE: EEOC Charge at DOJ	This document is irrelevant and should be excluded under FRE 402.

	(DOJ000140-142)	
146	Rachel Tudor email to Allan Townsend dated 8/13/2013 RE: EEOC Charge at DOJ (DOJ00143-146)	This document is irrelevant and should be excluded under FRE 402.
147	Rachel Tudor email to Allan Townsend dated 8/15/2013 RE: September 26, 2010 email (DOJ000147)	
148	Rachel Tudor email to Allan Townsend dated 8/16/2013 RE: Scoufos letters (DOJ000149)	
149	Rachel Tudor email to Allan Townsend dated 11/25/2013 RE: Decision? (DOJ000152)	This document is irrelevant and should be excluded under FRE 402.
150	Allan Townsend email to Rachel Tudor dated 11/27/2013 copied to Louis Lopez RE: Decision? (DOJ000153-154)	This document is irrelevant and should be excluded under FRE 402.
151	EEOC Request for Information regarding Charge #564-2011-00849 outlining issues (DOJ01663-1674)	No party produced documents Bates numbered DOJ01663-1674. Tudor is unable to determine what these documents are and, thus, objects to preserve her rights.
152	Notice of Right to Sue within 90 Days dated 4/2/2015 (DOJ004574)	No party produced a document Bates numbered DOJ004574. Tudor is unable to determine what this document is and, thus, objects to preserve her rights. If Defendants intended to identify the document Bates numbered EEOC004574, Tudor would not object to that document.
153	EEOC Determination letter (DOJ004576-4577)	No party produced documents Bates numbered DOJ004576-4577. Tudor is unable to determine what these documents are and, thus, objects to preserve her rights. If Defendants intended to identify the documents Bates numbered EEOC004576-4577, Tudor would have no objection.
154	EEOC Charge of Discrimination signed by Rachel Tudor(DOJ4592-4593)	No party produced documents Bates numbered DOJ4592-93. Tudor is unable to determine what these documents are and, thus, objects to preserve her rights. If Defendants intended to identify the documents Bates numbered EEOC004592-4593,

		Tudor would have no objection.
155	EEOC Charge of Discrimination dated 7/6/211 (DOJ004595-4596)	No party produced documents Bates numbered DOJ004595-96. Tudor is unable to determine what these documents are and, thus, objects to preserve her rights. If Defendants intended to identify the documents Bates numbered EEOC004595-4596, Tudor objects on the basis of hearsay. The draft charge Bates numbered EEOC004595-96 is unsigned and, thus, is not a statement of Tudor.
156	Rachel Tudor email to Kathy Nusz dated 2/6/2012 RE: Thursday, February 9, 2012 (DOJ004612-4613)	No party produced documents Bates numbered DOJ004612-13. Tudor is unable to determine what these documents are and, thus, objects to preserve her rights. If Defendants intended to identify the documents Bates numbered EEOC004612-13, Tudor objects. The emails Bates numbered EEOC004612-13 are irrelevant and potentially misleading. They should be excluded under FRE 402 and/or 403.
157	Medical records produced by Rachel Tudor in Discovery (PI000428-432)	
158	SEOSU Payroll Advice for 1/1/2011 – 1/31/2011 for Rachel Tudor (PI000449)	
159	SEOSU Payroll Advise for 1/1/2011 – 1/31/2011 for Rachel Tudor (PI000452)	
160	Cary Isreal with Collin College Memorandum to Rachel Tudor dated 8/30/2013 RE: Compensation 2013-2014 (PI000453)	
161	Cary Isreal with Collin College Memorandum to Rachel Tudor dated 9/3/2014 RE: Compensation 2014-2015 (PI000454)	
162	Collin County Community College District Full-Time Faculty Contract beginning	

	8/12/2014 and ending May 2016 signed by Rachel Tudor on 4/22/2015 (PI000455-456)	
163	Kathy Nusz's handwritten notes of EEOC interview of James Knapp (EEOC4798-4799)	
164	Kathy Nusz's handwritten notes of EEOC interview of Doug McMillan (EEOC4821-4829)	The EEOC investigator's handwritten notes taken during the questioning of Doug McMillan are irrelevant and potentially confusing to the jury. The investigator recorded the interview and, thus, the actual content of the interview may be confused with these notes. Thus, these notes should be excluded under FRE 402 and/or 403.
165	EEOC Typed Questions for Doug McMillan Interview (EEOC4815-4817)	The EEOC investigator's notes of questions she planned to ask Dr. McMillan are irrelevant and potentially confusing to the jury. The investigator recorded the interview and, thus, the actual content of the interview may be confused with these notes. Thus, these notes should be excluded under FRE 402 and/or 403.
166	Kathy Nusz's handwritten notes of EEOC interview of Larry Minks on 2/8/2012 (EEOC4811-4814)	The EEOC investigator's handwritten notes taken during the questioning of Larry Minks are irrelevant and potentially confusing to the jury. The investigator recorded the interview and, thus, the actual content of the interview may be confused with these notes. Thus, these notes should be excluded under FRE 402 and/or 403.
167	Kathy Nusz's handwritten notes of EEOC interview of John Mischo on 2/8/2012 (EEOC4835-4838)	The EEOC investigator's handwritten notes taken during the questioning of John Mischo are irrelevant and potentially confusing to the jury. The investigator recorded the interview and, thus, the actual content of the interview may be confused with these notes. Thus, these notes should be excluded under FRE 402 and/or 403.
168	Kathy Nusz's handwritten notes of EEOC interview of Virginia Parrish (EEOC4777-4780)	
169	Kathy Nusz's handwritten notes of EEOC interview of Larry	

	Prather (EEOC4791-4793)	
170	Kathy Nusz's handwritten notes of EEOC interview of Randy Prus (EEOC4769-4771)	
171	Kathy Nusz's handwritten notes of EEOC interview of Lucretia Scoufos (EEOC4843-4858)	The EEOC investigator's handwritten notes taken during the questioning of Lucretia Scoufos are irrelevant and potentially confusing to the jury. The investigator recorded the interview and, thus, the actual content of the interview may be confused with these notes. Thus, these notes should be excluded under FRE 402 and/or 403.
172	Kathy Nusz's handwritten notes of EEOC interview of Wilma Shires (EEOC4776)	The EEOC investigator's handwritten notes taken during the questioning of Wilma Shires are irrelevant and potentially confusing to the jury. The investigator recorded the interview and, thus, the actual content of the interview may be confused with these notes. Thus, these notes should be excluded under FRE 402 and/or 403.
173	Kathy Nusz's handwritten notes of EEOC interview of Mark Spencer (EEOC4785-4790)	
174	Kathy Nusz's handwritten notes of EEOC interview of Claire Stubblefield on 2/8/2012 (EEOC4830-4834)	The EEOC investigator's handwritten notes taken during the questioning of Claire Stubblefield are irrelevant and potentially confusing to the jury. The investigator recorded the interview and, thus, the actual content of the interview may be confused with these notes. Thus, these notes should be excluded under FRE 402 and/or 403.
175	Kathy Nusz's handwritten notes of EEOC interview of Ross Walkup (EEOC4807-4820)	Tudor objects because the Bates range for these notes is incorrect. The notes for the Walkup interview are Bates numbered EEOC4807-08.  Tudor also objects because the EEOC investigator's handwritten notes taken during the questioning of Ross Walkup are irrelevant and potentially confusing to the jury. The investigator recorded the interview and, thus, the actual content of the interview may be confused with these notes. Thus,

		these notes should be excluded under FRE 402 and/or 403.
176	Kathy Nusz's handwritten notes of EEOC interview of Charles Weiner on 2/8/2012 (EEOC4839-4842)	The EEOC investigator's handwritten notes taken during the questioning of Charles Weiner are irrelevant and potentially confusing to the jury. The investigator recorded the interview and, thus, the actual content of the interview may be confused with these notes. Thus, these notes should be excluded under FRE 402 and/or 403.
177	Kathy Nusz's handwritten notes of EEOC interview of Caryn Witten (EEOC4767-4768)	
178	Kathy Nusz's handwritten notes of EEOC interview of Jane McMillan (EEOC4794-4797)	The EEOC investigator's handwritten notes taken during the questioning of Jane McMillan are irrelevant and potentially confusing to the jury. The investigator recorded the interview and, thus, the actual content of the interview may be confused with these notes. Thus, these notes should be excluded under FRE 402 and/or 403.
179	Kathy Nusz's handwritten notes of EEOC interview of William Fridley (EEOC4802-4806)	
180	Kathy Nusz's handwritten notes of EEOC interview of Margaret Cotter-Lynch (EEOC4867-4872)	
181	Kathy Nusz's handwritten notes of EEOC interview of Cathy Conway on 2/8/2012 (EEOC4809-4810)	The EEOC investigator's handwritten notes taken during the questioning of Cathy Conway are irrelevant and potentially confusing to the jury. The investigator recorded the interview and, thus, the actual content of the interview may be confused with these notes. Thus, these notes should be excluded under FRE 402 and/or 403.
182	Kathy Nusz's handwritten notes of EEOC interview of Lisa Coleman (EEOC4762-4764)	The Bates number range the Defendants have identified is incomplete. Ms. Nusz's notes of her interview of Dr. Coleman are at EEOC4762-4766. All pages should be included for sake of completeness.

183	Kathy Nusz's handwritten notes of EEOC interview of Bryon Clark (EEOC4818)	As a threshold matter, Ms. Nusz's notes of Dr. Clark's interview contain more pages than the Bates number range that the Defendants have identified. The notes are at EEO4818-4820. All pages should be included for sake of completeness.  However, the EEOC investigator's handwritten notes taken during the questioning of Bryon Clark are irrelevant and potentially confusing to the jury. The investigator recorded the interview and, thus, the actual content of the interview may be confused with these notes. Thus, these notes should be excluded under FRE 402 and/or 403.
184	Kathy Nusz's handwritten notes of EEOC interview of Janet Barker (EEOC4783-4784)	
185	Kathy Nusz's handwritten notes of EEOC interview of Teresa Anderson (EEOC4781-4782)	
186	Kathy Nusz's handwritten notes of EEOC interview of Daniel Althoff (EEOC4772-4773)	
187	Kathy Nusz's handwritten notes of EEOC interview of Paula Allen (EEOC4774-4775)	
188	Transcript and Audio of EEOC Interview of Ross Walkup	Tudor does not know what transcript the Defendants are referring to here. Transcripts of interviews were not produced in discovery.
189	Transcript and Audio of EEOC Interview John Mischo	Tudor does not know what transcript the Defendants are referring to here. Transcripts of interviews were not produced in discovery.
190	Transcript and Audio of EEOC Interview of Bryon Clark	Tudor does not know what transcript the Defendants are referring to here. Transcripts of interviews were not produced in discovery.
191	Transcript and Audio of EEOC Interview of Claire Stubblefield	Tudor does not know what transcript the Defendants are referring to here. Transcripts of interviews were not produced in discovery.
192	Transcript and Audio of 2/9/2012 DOJ Interview of Jane McMillan	Tudor does not know what transcript the Defendants are referring to here. Transcripts of interviews were not produced in discovery. Furthermore,

		this description is inaccurate because the EEOC conducted this interview, not DOJ.
193	Transcript and Audio of 2/8/2012 DOJ Interview of Larry Minks	Tudor does not know what transcript the Defendants are referring to here. Transcripts of interviews were not produced in discovery. Furthermore, this description is inaccurate because the EEOC conducted this interview, not DOJ.
194	Transcript and Audio of 2/8/2012 DOJ Interview of Doug McMillan	Tudor does not know what transcript the Defendants are referring to here. Transcripts of interviews were not produced in discovery. Furthermore, this description is inaccurate because the EEOC conducted this interview, not DOJ.
195	Transcript and Audio of 2/8/2012 DOJ Interview of Charles Weiner	Tudor does not know what transcript the Defendants are referring to here. Transcripts of interviews were not produced in discovery. Furthermore, this description is inaccurate because the EEOC conducted this interview, not DOJ.
196	Transcript and Audio of 2/8/2012 DOJ Interview of Cathy Conway	Tudor does not know what transcript the Defendants are referring to here. Transcripts of interviews were not produced in discovery. Furthermore, this description is inaccurate because the EEOC conducted this interview, not DOJ.
197	Kathy Nusz letter to Claire Stubblefield dated 1/5/2012 RE: Additional Information Needed and Request to Interview Personnel (EEOC4743-4744)(Plaintiff's Depo Exhibit #43)	
198	Claire Stubblefield email to Kathy Nusz dated 1/11/2012 RE: February 7th date (EEOC4741-4742)(Plaintiff's Depo Exhibit #43)	This description of the document is inaccurate in that it erroneously indicates that the document is Plaintiff's Deposition Exhibit 43.
199		Note: There is no Exhibit 199 on Defendants' Final Exhibit List. See ECF Doc. 114 at 16.
200	Rachel Tudor email to John Mischo dated 10/27/2009 RE: Tenure Promotion	

	Committee (PI000583)(Plaintiff's Depo Exhibit #87)	
201	Lucretia Scoufos email to Ross Walkup dated 1/3/2011 RE: Scoufos.pdf (DEF1132-1135)(Plaintiff's Depo Exhibit #139)	
202	Memorandum from Larry Minks to Lucretia Scoufos dated 6/15/2010 RE: Notification of Tenure and/or Promotion Decision (EEOC902)(Plaintiff's Depo Exhibit #152)	
203	Randy Prus email to Lucretia Scoufos dated 4/30/2010 RE: "Open Mic" publisher (EEOC904)(Plaintiff's Depo Exhibit #154)	
204	All pleadings of record filed by any party in the case.	To the extent the term "pleadings" refers to anything other than Plaintiff's Complaint, Plaintiff-Intervenor's Complaint, and Defendants' Answers, Plaintiff objects. Without a showing of particular need or relevance, court filings are not relevant evidence and, in particular, information regarding discovery disputes should not be presented to the jury.
205	Defendants reserve the right to introduce additional documents obtained through ongoing discovery.	
206	DOJ/EEOC—documents reflecting position on Title VII coverage in 2007, 2009-2010, 2010-2011.	The description of these documents is so vague that Tudor needs more information to determine the full breadth of her objections. However, based on this description, Tudor objects to these documents on the basis of FRE 402 and/or 403 because they are irrelevant to the jury's determination and potentially misleading. The Court will instruct the jury on the law and these documents could confuse the jury on what the law is that they are

		applying.
207	DOJ/EEOC documents regarding health insurance provided to its employees in 2007 through 2011.	<p>The description of these documents is so vague that Tudor needs more information to determine the full breadth of her objections.</p> <p>As a threshold matter, no documents matching Defendants' vague description were produced by any parties in this litigation. However, based on Defendants' vague description alone, Tudor objects to these documents on the basis of FRE 402 and/or 403 because they are irrelevant to the jury's determination and potentially misleading. What is contained in health insurance policies available to DOJ and EEOC employees has absolutely no relevance to this case. These documents could also confuse the jury to the extent the jury confuses them with documents related to Defendants' health insurance policies.</p>
208	EEOC documents produced by Grant Doty.	It is unclear what documents the Defendants are referring to and the Defendants should clarify. Tudor reserves the right to object after she receives further clarification from the Defendants.
209	Rachel Tudor's Personnel File from Collin College (CC1-CC1083)	<p>No documents matching this description and/or bearing Bates mark CC1-CC1083 have been produced in this litigation.</p> <p>Additionally, it is unclear what documents the Defendants are referring to and the Defendants should clarify. Tudor reserves the right to object after she receives further clarification from the Defendants.</p>
210	All exhibits listed by Plaintiff not objected to by Defendants.	
211	All exhibits listed by Plaintiff/Intervenor not objected to by Defendants.	
212	All documents needed for rebuttal purposes.	

Dated: September 22, 2017

/s/ Ezra Young  
Ezra Young (NY Bar No. 5283114)  
Law Office of Ezra Young  
30 Devoe, 1a  
Brooklyn, NY 11211  
P: 949-291-3185  
F: 917-398-1849  
ezraiyoung@gmail.com

**CERTIFICATE OF SERVICE**

I hereby certify that on September 22, 2017, I electronically filed a copy of the foregoing with the Clerk of Court by using the CM/ECF system, which will automatically serve all counsel of record.

/s/ Ezra Young  
Ezra Young (NY Bar No. 5283114)