

**IN THE UNITED STATES DISTRICT COURT  
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.

**DEFENDANTS' PROPOSED VOIR DIRE**

COME NOW Defendants, Southeastern Oklahoma State University ("SEOSU") and Regional University System of Oklahoma ("RUSO") and request this Court to submit the following questions to the jury panel during the Voir Dire examination in the above styled and titled case.

1. The Defendants in this case are a state university and its board of regents. Have you had any experiences with the State of Oklahoma, its universities, or employees that would interfere with your ability to be fair to the Defendants? If so, can you explain those circumstances? Do you think you can set those feelings aside and give the Defendants a fair trial?

2. The Intervenor in this case is claiming that Defendants wrongfully discriminated in employment on the basis of gender. Have you or anyone close to you been in an employment situation where you or the person close to you believed

they were being discriminated against or otherwise treated unfairly in a job? If so, can you tell us briefly about that situation? Did you or your family member/friend try to report the unfair treatment? Did the employer handle the situation fairly and effectively? Is there anything about that situation that would interfere with your ability to be a fair and impartial juror in this case?

3. Have you or anyone close to you ever been accused of discriminating against someone else in an employment setting? If so, can you briefly describe that situation? Is there anything about that situation that would interfere with your ability to be a fair and impartial juror in this case?

4. Have you or anyone close to you ever been in a situation where you/their work place has been involved in an allegation of mistreatment or treated an employee unfairly? Can you briefly describe the situation? Do you think the employer handled it appropriately? If not, why not? Do you think the employee making the accusation handled it appropriately? If not, why not? Is there anything about that situation that would interfere with your ability to be a fair and impartial juror in this case?

5. The Intervenor in this case also claims to have been retaliated against for complaining about discrimination. Have you or anyone close to you been in an employment situation where you or the person close to you believed they were being retaliated against or otherwise treated unfairly in a job? If so, can you tell us briefly about that situation? Did you or your family member/friend try to report the unfair treatment? Did the employer handle the situation fairly and effectively? Is there

anything about that situation that would interfere with your ability to be a fair and impartial juror in this case?

6. Have you or anyone close to you ever had an employment dispute? Can you briefly describe that situation? Is there anything about that situation that would interfere with your ability to be a fair and impartial juror in this case?

7. Have you or anyone close to you ever been a supervisor who has been accused of treating an employee unfairly? Can you briefly describe that situation? Do you have an opinion as to how the situation was handled? Is there anything about that situation that would interfere with your ability to be a fair and impartial juror in this case?

8. Have you ever been involved in any type of legal action? Can you briefly describe your role, *i.e.*, plaintiff, defendant? Did it result in a trial or was the matter resolved prior to trial? If it went to trial, was it tried to a jury or a judge? Was there anything about that experience that would interfere with your ability to be a fair and impartial juror in this case?

9. Have you ever sat on a jury before? What type of jury - state or federal? Criminal or civil? Were you the foreman? Was the jury able to reach a verdict? Did you enjoy the experience? If so, why? If not, why not? Was there anything about that experience that would interfere with your ability to be a fair and impartial juror in this case?

10. In this case, Intervenor has accused the Defendants of discrimination based on transitioning from being a man to a woman during employment at

SEOSU, starting in 2007. Intervenor alleges denial of tenure because of this gender transition. Have you or anyone in your family ever been acquainted with a transgendered person? Can you describe this relationship? Is there anything about that acquaintance/relationship or Intervenor's transgender status that would interfere with your ability to serve as a fair and impartial juror on this case?

11. Have you or anyone close to you ever been in a situation where you/their work place has been involved in an allegation of discrimination towards an employee? Can you briefly describe the situation? Do you have an opinion as to how that situation was handled? Do you think the employer handled it appropriately? If not, why not? Do you think the employee making the accusation handled it appropriately? If not, why not? Is there anything about that situation that would interfere with your ability to be a fair and impartial juror in this case?

12. Have you or anyone close to you ever felt like they've been discriminated against? Can you briefly describe the situation? Were you/they able to do anything about the situation? Is there anything about that situation that would interfere with your ability to be a fair and impartial juror in this case?

13. Have you or anyone close to you ever been a supervisor who has been accused of discriminating against an employee at work? Can you briefly describe that situation? Do you have an opinion as to how the employer handled the situation? Do you have an opinion as to have the employee handled the situation? Is there anything about that situation that would interfere with your ability to be a fair and impartial juror in this case?

14. One of the issues in this case is that Intervenor was not granted tenure. Have you or anyone close to you been involved in a tenure selection process? If so, please explain the involvement and whether it left you with any distinct impressions or biases regarding the tenure process or individuals involved.

15. Do you have any bumper stickers on your car? If so, what does it say?

Respectfully submitted,

/s/ Dixie L. Coffey

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of October 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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/s/Dixie L. Coffey  
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