

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.)	

**PLAINTIFF/INTERVENOR’S REPLY TO DEFENDANTS’ COMBINED
RESPONSE IN OPPOSITION TO PLAINTIFF/INTERVENOR’S MOTIONS IN
LIMINE WITH INCORPORATED BRIEF**

NOW COMES Plaintiff/Intervenor, Rachel Tudor (Tudor), by and through undersigned counsel, and responds to Defendants’ Combined Response in Opposition to Plaintiff/Intervenor’s Motions in Limine as follows:

After reviewing Defendants’ brief, Plaintiff/Intervenor hereby withdraws any argument that Defendants’ failed to provide the Collin College documents. It has been Plaintiff/Intervenor’s practice to upload all documents to an electronic file. Due to some oversight, the letter and documents in question did not get uploaded to the

electronic file. After a thorough investigation of our hard copy file, counsel discovered the August 29, 2016 letter and corresponding disc containing the documents. (See Novotny Declaration, Exhibit 1). Plaintiff/Intervenor's counsel apologizes for any misstatement regarding said documents.

Plaintiff/Intervenor stands by the remaining legal argument(s) in her original motions.

Dated: October 30, 2017

/s/ Brittany M. Novotny
Brittany M. Novotny (OBA 20796)
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CERTIFICATE OF SERVICE

I hereby certify that on October 30, 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/ Brittany M. Novotny
Brittany M. Novotny (OBA 20796)

EXHIBIT 1

Declaration of Brittany M. Novotny

Under penalty of perjury, I hereby declare the following:

- 1) I am counsel of record for Plaintiff/Intervenor Dr. Rachel Tudor;
- 2) I drafted the Plaintiff/Intervenor's Motions in Limine;
- 3) It has been the practice of counsel for Plaintiff/Intervenor to upload all case related documents into electronic files;
- 4) The August 29, 2016 letter and documents identified by Defendants as Dr. Tudor's Collin College personnel file were served on my office on or about the same date;
- 5) Due to an error, those documents did not get uploaded to the electronic file;
- 6) After reviewing Defendants' opposition brief, I performed a thorough search of my hard copy files and discovered the letter and corresponding disc containing the documents.

Signed under penalty of perjury this 26th day of October, 2017

/s/Brittany M. Novotny

Brittany M. Novotny

Attorney for Plaintiff/Intervenor