

**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.

**DEFENDANTS’ OBJECTIONS AND COUNTER DESIGNATIONS
OF PLAINTIFF’S MOTION TO ADMIT TESTIMONY OF CATHY CONWAY**

Defendants, Southeastern Oklahoma State University (“SEOSU”) and the Regional University System of Oklahoma (“RUSO”) submit the following objections and counter designations of deposition testimony in regards to the deposition transcript of Cathy Conway:

Plaintiff Designations	Objections	Counter Designations
40:1-23	FRE 403; Confusing; lack of foundation.	
41:24-25		
42:1, 3-6		
44:3-5, 7-13		58:24-25 59:8-10, 16-19 *Plaintiff’s Ex. 26 is Plaintiff’s Trial Exhibit 15.
61:19-25 and 62:2-25 and 63:1-25 and 64:1-3		

70:13-23	Leading	69:24-25 70:1-6, 8
90:17-25 and 91:1-25	FRE 104, 401, 402, 403; Lack of foundation.	
92:1-25	FRE 104, 401, 402, 403; Lack of foundation. Objection to 92:10-11.	
93:1-17	FRE 104, 401, 402, 403; Lack of foundation.	
94:2-13		
127:3-15	Leading	127:16-18
175:7-11	FRE 401, 402, 403: Court has excluded all health insurance evidence.	Benefits for sex reassignment.
179:11-16	FRE 401, 402, 403: Court has excluded all health insurance evidence.	Benefits for sex reassignment.
190:2-8		190:19-25
209:6-20	FRE 104, 401, 402, 403; Out of context and confusing.	209:21-23

Respectfully submitted,

/s/ Dixie L. Coffey

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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of November 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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