

**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' AMENDED 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 amended objections and counter designations of deposition testimony in regards to the deposition transcript of Cathy Conway:

| Plaintiff Designations | Objections | Counter Designations |
|--|---|---|
| 40:1-23 | Fed. R. Evid. 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 | Fed. R. Evid. 104, 401, 402, 403; Lack of Foundation. | |
| 92:1-25 | Fed. R. Evid. 104, 401, 402, 403; Lack of foundation. (Objection at 92:10-11). | |
| 93:1-17 | Fed. R. Evid. 104, 401, 402, 403; Lack of Foundation. | |
| 94:2-13 | | |
| 127:3-15 | Leading | 127:16-18 |
| 175:7-11 | Fed. R. Evid. 401, 402, 403: Court has excluded all health insurance evidence. | Benefits for sex reassignment. |
| 179:11-16 | Fed. R. Evid. 401, 402, 403: Court has excluded all health insurance evidence. | Benefits for sex reassignment. |
| 190:2-8 | | 190:19-25 |
| 209:6-20 | Fed. R. Evid. 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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