

Exhibit 1

From: Gonzalez, Carmen <gonzalez@seattleu.edu>
To: Gonzalez, Carmen <gonzalez@seattleu.edu>
Cc: Jennifer.gomez@wayne.edu <Jennifer.gomez@wayne.edu>; cleo@law.gwu.edu <cleo@law.gwu.edu>; Yolanda.niemann@unt.edu <Yolanda.niemann@unt.edu>; rachelleacjopline@gmail.com <rachelleacjopline@gmail.com>; Rachel.tudor@yahoo.com <Rachel.tudor@yahoo.com>; Stacey.patton@morgan.edu <Stacey.patton@morgan.edu>; CaseKi@uhcl.edu <CaseKi@uhcl.edu>; yesseniamanzo@gmail.com <yesseniamanzo@gmail.com>; Melissa.slocum@unlv.edu <Melissa.slocum@unlv.edu>; rileymua@gvsu.edu <rileymua@gvsu.edu>; O'Brien, Jodi <jobrien@seattleu.edu>; h.jaffa@me.com <h.jaffa@me.com>; mdeo@jtsl.edu <mdeo@jtsl.edu>; Julia.chang@cornell.edu <Julia.chang@cornell.edu>; EHaozous@salud.unm.edu <EHaozous@salud.unm.edu>; ppespinoza@utep.edu <ppespinoza@utep.edu>; michellespidermonkey@gmail.com <michellespidermonkey@gmail.com>; Wendy.Williams@bera.edu <Wendy.Williams@bera.edu>; jlavariega@callutheran.edu <jlavariega@callutheran.edu>; lbrackett@pugetssound.edu <lbrackett@pugetssound.edu>; linniss@mail.smu.edu <linniss@mail.smu.edu>; ntran@mail.sdsu.edu <ntran@mail.sdsu.edu>; Gutierrez y Muhs, Gabriella <gutierg@seattleu.edu>; phoff@ilstu.edu <phoff@ilstu.edu>; Mdc6j@virginia.edu <Mdc6j@virginia.edu>; Jamiella.Brooks@bera.edu <Jamiella.Brooks@bera.edu>; Marcia.owens@famu.edu <Marcia.owens@famu.edu>; fujiwara@uoregon.edu <fujiwara@uoregon.edu>; Amelia.ortega@gmail.com <Amelia.ortega@gmail.com>; lhasunuma@gmail.com <lhasunuma@gmail.com>; jeanette@ad.nmsu.edu <jeanette@ad.nmsu.edu>; majones@unomaha.edu <majones@unomaha.edu>; Jemimah.Young@unt.edu <Jemimah.Young@unt.edu>; savinggracee@gmail.com <savinggracee@gmail.com>; delagarza@asu.edu <delagarza@asu.edu>; JBridge@uwyo.edu <JBridge@uwyo.edu>; dhines@ku.edu <dhines@ku.edu>; Patrice.bounds@gmail.com <Patrice.bounds@gmail.com>; Betts.128@osu.edu <Betts.128@osu.edu>; Tip2017proposals@gmail.com <Tip2017proposals@gmail.com>; piyer@miis.edu <piyer@miis.edu>; Imp@cwsl.edu <Imp@cwsl.edu>
Sent: Monday, March 26, 2018, 11:35:50 PM CDT
Subject: Presumed Incompetent II -- Accepted Papers

Dear colleague,

We are delighted to invite you to submit a full-length paper for the second edition of *Presumed Incompetent*. Although we were inundated with abstracts in response to our call for papers, your abstract was one of the strongest in the collection. Congratulations! We are confident that your narrative will make an important contribution to the ongoing conversation about the challenges and injustices that pervade academia, and will provide guidance for faculty, staff, administrators and students who strive to improve their department and university climates.

You may be contacted in the next couple of weeks with further guidance regarding your full narrative. If we do not email you with further guidance, but you have questions, please do not hesitate to contact one of the editors. All final submissions will be vetted by the three editors and by the press.

Full-length papers are due **May 31, 2018** and should be submitted to all three co-editors at the email addresses set forth below. To accommodate as many contributors as possible, papers must be **no longer than 5000 words** (including references in APA style). Please submit your papers as Microsoft Word documents (not PDFs), double-spaced, using 12-point Times New Roman font, and one inch margins.

As we explained in the call for papers, we are very pleased that we have an advance contract from Utah State University Press (an imprint of Colorado University Press) for

this second volume of *Presumed Incompetent*. Once we receive your full-length paper, it will undergo careful review by the co-editors and the press to determine whether it will be included in the final volume.

We expect to submit the completed manuscript to the press by December 1, 2018. We anticipate that the manuscript will undergo review in early 2019, copy editing in spring, 2019, and be in print in by summer or early fall, 2019. To ensure that we are able to meet this ambitious schedule, we ask for your cooperation in meeting deadlines and responding to inquiries.

By Monday, April 10, please confirm that you still plan to submit your paper to *Presumed Incompetent 2* and that you will fulfill the May 31, 2018 deadline.

Please submit your response (by April 10) and your full-length paper (no longer than 5000 words including references by May 31, 2018) to all three editors -- Yolanda Flores Niemann, Gabriella Gutierrez y Muhs, and Carmen G. Gonzalez by cutting and pasting the following E-mail addresses:

Yolanda.niemann@unt.edu
gutiery@seattleu.edu
gonzalez@seattleu.edu

Please do not hesitate to contact us if you should have any questions or require additional information.

Best regards,

Yolanda Flores Niemann

Gabriella Gutierrez y Muhs

Carmen G. Gonzalez

Carmen G. Gonzalez
Professor of Law
Seattle University School of Law
901 12th Avenue
Seattle, WA 98122
Telephone: (206) 398-4067
SSRN Author page:
<http://ssrn.com/author=476828>

Exhibit 2

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Southeastern News

Dr. Cotter-Lynch recipient of prestigious Oklahoma Foundation Medal for Excellence

FEBRUARY 27, 2018 by UNIVERSITY COMMUNICATIONS



Dr. Margaret Cotter-Lynch

DURANT, Okla. – The Oklahoma Foundation for Excellence has announced the winners of its 2018 Oklahoma Medal for Excellence awards honoring five outstanding educators in Oklahoma’s public schools.

Among the recipients is Dr. Margaret Cotter-Lynch, English professor and director of the honors program at Southeastern Oklahoma State University. She is being recognized in the community college/regional university teaching category.

The awards will be presented at the foundation’s 32nd annual Academic Awards Banquet on May 19 at the Embassy Suites Conference Center in Norman.

The honor includes a monetary award of \$5,000 and glass “Roots and Wings” sculpture designed by the late Oklahoma artist Ron Roberts and produced by Tim Brown of Edmond.

Medals are awarded annually to five outstanding Oklahoma teachers, one each at the elementary, secondary, community college/regional university and research university levels. In addition, the foundation presents a Medal for Excellence to an exceptional administrator from the elementary or secondary level.

“We know that education is the best investment Oklahoma can make in its future,” said David L. Boren, founder and chairman of the Oklahoma Foundation for Excellence, a non-profit organization that recognizes and encourages academic excellence in the state’s public schools. “By honoring these exceptional educators, we are sending a message that we deeply value excellence in public schools and the professionals who have given so much of themselves to enrich the lives of our children.”

Cotter-Lynch joined the Southeastern faculty in 2005. She holds her Ph.D. and master’s from the University of Michigan, and a bachelor’s from Brown University.

“Dr. Cotter-Lynch is certainly deserving of this recognition,” said Southeastern president Sean Burrage. “Her dedication and enthusiasm in serving her students is admirable and she is truly making a difference in their lives as they work to achieve their educational goals.”

The following information on Cotter-Lynch is included in the announcement of her selection by the OFE:

She is a scholar on literary theory, Medieval Latin grammar and early Christian theology, but at Southeastern she is best known as an encouraging mentor who helps students discover and pursue their potential.

“My best friend coined the term ‘parentessor’ to describe what I do for a living: half parent, half professor,” said Cotter-Lynch, who serves as an adviser to more than 100 English and Honors students. Many of her students come from rural communities and are first-generation college students. “For me, teaching is not confined to the classroom, nor is it about merely conveying subject-area content. It is about contributing to students’ growth and success as humans.”

Being a good human requires participation in community, she says. To that end, she has helped design a new Honors curriculum that focuses on trans-disciplinary learning and community engagement.

“This is a fancy way of saying that a student’s entire educational experience should coalesce around the goal of making them a contributing member of a strong and functioning community,” she said. The curriculum also focuses applying what a student learns in one course to other classes and to the outside world. Cotter-Lynch co-teaches a trans-disciplinary English and history course to help students learn to view content from another disciplinary perspective and consider how it applies to their own lives.

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Dewey Briscoe, a non-traditional student, said he is the first in his family to receive a college degree, thanks to Dr. Cotter-Lynch. “No matter how many times I wanted to throw in the towel, she would never let me. She knew what I was capable of and continued to challenge me and hold me to those standards.”

The complete list of 2018 Medal for Excellence winners:

Brandi Caldwell, Lakeview Elementary School, Norman (elementary level)

Janet Johnson, Clyde Boyd Middle School, Sand Springs (secondary)

Ronia Davison, principal, Sadler Arts Academy, Muskogee (elementary/secondary administration)

Dr. Margaret Cotter-Lynch, professor of English and Honors Program Director, Southeastern Oklahoma State University, Durant (regional university or community college)

Dr. Tyler Ley, professor of civil engineering, Oklahoma State University, Stillwater (research university)

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Academic All-Staters (<index.php?our-programs/academic-awards-program/academic-all-staters>)

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Dr. Margaret Cotter-Lynch, Southeastern Oklahoma State University, Durant

2018 Medal for Excellence in Regional University/Community College Teaching

Dr. Margaret Cotter-Lynch, the recipient of the Oklahoma Medal for Excellence in Teaching at a Regional University/Community College, is a professor of English and Honors Program director at Southeastern Oklahoma State University. She is a scholar on literary theory, Medieval Latin grammar and early Christian theology, but at Southeastern she is best known as an encouraging mentor who helps students discover and pursue their potential.



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Exhibit 3

Jury Trial - Volume 5
November 17, 2017

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

DR. RACHEL TUDOR,)	
)	
Plaintiff,)	
)	
vs.)	Case No. CIV-15-324-C
)	
SOUTHEASTERN OKLAHOMA STATE)	
UNIVERSITY and THE REGIONAL)	
UNIVERSITY SYSTEM OF)	
OKLAHOMA,)	
)	
Defendants.)	
)	

VOLUME 5
TRANSCRIPT OF JURY TRIAL
BEFORE THE HONORABLE ROBIN J. CAUTHRON
FRIDAY, NOVEMBER 17, 2017; 9:15 a.m.
OKLAHOMA CITY, OKLAHOMA

Proceedings recorded by mechanical stenography,
transcript produced by computer.

Jury Trial - Volume 5
November 17, 2017

1 Dr. Tudor objects to this because she believes, first and
2 foremost, this instruction is a bit confusing to the jury, and
3 she would suggest that a different instruction be given.

4 Dr. Tudor also objects to this instruction on the grounds
5 that defendants have waived, at the docket call on
6 November 1st, 2017, any quibbling over the meaning of "sex" in
7 this case. Because defendants claimed that they would not
8 quibble over the meaning of "sex," plaintiff told the Court
9 that our expert witness on the issue of sex and what
10 transgender means and all of those terms was not relevant to
11 this case.

12 And, lastly, plaintiff objects because she believes that
13 this puts an additional burden on her as a transgender person
14 in violation of the Equal Protection Clause of the
15 Constitution.

16 That's plaintiff's only objection, Your Honor.

17 THE COURT: All right. And as I've indicated, I
18 don't agree and will give it as directed.

19 Ms. Coffey.

20 MS. COFFEY: Your Honor, do I need to address any of
21 Mr. Young's arguments?

22 THE COURT: No.

23 MS. COFFEY: Your Honor, defendants believe that the
24 facts in evidence support jury instructions for spoliation of
25 evidence and for an instruction on failure to conform to sex

Jury Trial - Volume 5
November 17, 2017

1 stereotype.

2 Oh, I'm sorry. Defendants also believe that the facts in
3 evidence support a jury instruction on mitigation of damages.

4 THE COURT: As I've indicated, I don't think there
5 is a dispute about the missing evidence sufficient to support
6 a spoliation instruction.

7 I believe the second one, whatever it was you said --
8 what was the second one?

9 MS. COFFEY: Failure to conform to sex stereotype.

10 THE COURT: I think that's included in what is
11 given, and I don't believe there's any evidence to support the
12 defendants' burden on mitigation. That's the reason those
13 were excluded.

14 While you're there, would you make a record --

15 (Discussion held off the record.)

16 THE COURT: -- on your motion for judgment as a
17 matter of law.

18 MS. COFFEY: Yes, Your Honor. We believe the facts
19 in evidence support a motion for directed verdict on each of
20 plaintiff's claims: plaintiff's claim of hostile work
21 environment, plaintiff's claim for discrimination in both
22 tenure denial and denial of reapplication for tenure, as well
23 as plaintiff's claim for retaliation.

24 Therefore, we request that the Court enter a directed
25 verdict in favor of defendants.

Exhibit 4

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

UNITED STATES OF AMERICA, and))	
)	
DR. RACHEL TUDOR,)	
)	
Plaintiffs,)	
)	
vs.)	NO. 5:15-CV-00324-C
)	
)	
SOUTHEASTERN OKLAHOMA)	
STATE UNIVERSITY, and)	
)	
THE REGIONAL UNIVERSITY)	
SYSTEM OF OKLAHOMA,)	
)	
Defendants.)	

DEPOSITION OF RACHEL JONA TUDOR, Ph.D., VOLUME I
TAKEN ON BEHALF OF THE DEFENDANTS
IN OKLAHOMA CITY, OKLAHOMA
ON MARCH 7, 2016

REPORTED BY: JANA C. HAZELBAKER, CSR

1 A Oh, I filed for unemployment.

2 Q When was that?

3 A It may have been the summer of 2008. I'm
4 unsure of the exact date. It may have been the
5 following summer.

6 Q Was it while you were a full-time employee
7 at Southeastern?

8 A Yes.

9 Q What was the outcome of your filing for
10 unemployment?

11 A They took the cost of the benefits, plus
12 interest, from my wages.

13 Q Who took them?

14 A Oklahoma -- whoever is responsible for the
15 unemployment benefits in Oklahoma.

16 Q So I'm not sure I understand. You filed
17 for unemployment and, as a result, someone took money
18 from -- from your paycheck?

19 A Yes. The State took the money that they
20 had paid me for benefits for the summer when I was
21 unemployed. They took those benefits, plus interest.

22 Q Did the State determine that they
23 wrongfully paid you unemployment?

24 A Yes.

25 Q Okay. And why -- so, ultimately, would you

1 agree that you were denied unemployment -- that you
2 were denied unemployment benefits and that's why the
3 State took them back?

4 A That was the determination that I filed, my
5 point of view of why I thought I was eligible for
6 them.

7 Q And the best that you can recall, this was
8 the summer of 2008 or 2009?

9 A Yes.

10 Q When did you come to work at Southeastern?

11 A 2007.

12 Q Are you sure? And I'm not trying to trick
13 you. I think that the documents show that you came
14 to Southeastern in 2004. You began teaching at
15 Southeastern in 2004.

16 A Oh, I misunderstood the question. I was
17 still thinking about the unemployment. It would be
18 helpful to see the document for my employment dates.

19 Q Okay. So as you sit here today, you don't
20 remember when you started working at Southeastern?

21 A I do remember.

22 Q Okay. When was that?

23 A In the fall of 2000 -- I'm counting
24 backwards now. The fall of 2004.

25 Q Why did you file for unemployment in the

1 summer of 2008 or 2009? And let me preface this, I
2 understand you're not certain as to which summer that
3 it was, and so I'll just say -- let me say, why did
4 you file for unemployment?

5 A Because I was unemployed during the summer.

6 Q Had you ever filed for unemployment before?

7 A Yes.

8 Q When?

9 A I don't recall. It's many years ago.

10 Q Where did -- at -- during your -- during
11 your employment with colleges and universities before
12 you came to Southeastern, did --

13 A Actually, I'm sorry, I think I misspoke. I
14 don't recall actually filing for unemployment before.
15 That may have been -- it may have been the first
16 time.

17 Q Okay. So as far as you recall, you never
18 applied for unemployment during the summer months
19 when you were working at any other college or
20 university; is that correct?

21 A To the best of my recollection.

22 Q Do you currently -- where are you currently
23 employed?

24 A Collin College.

25 Q Do you work during the summer at Collin

1 College?

2 A Yes.

3 Q Why didn't you file for unemployment any
4 previous summers while you were at Southeastern?

5 A The summer that I filed was a summer in
6 which I was not given a class to teach during the
7 summer. During this -- during this summer, I looked
8 at the -- there was -- there was the -- there were
9 job -- there were classes to teach, and -- but the
10 college used adjuncts instead of regular faculty to
11 teach those classes, thereby depriving me of
12 employment, and so I filed for unemployment.

13 Q Is that the first summer after coming to
14 Southeastern that you had not taught any classes
15 during the summer?

16 A As I said before, I'm not sure what summer
17 it was. It was a summer in which I understood that
18 regular faculty were eligible and certainly capable
19 to teach summer classes. But as a cost-saving
20 measure, adjuncts were employed instead of faculty.

21 Q Did you discuss the filing of unemployment
22 with any of your colleagues before filing for it?

23 A I don't recall.

24 Q Do you believe a decision to not allow you
25 to teach any classes during this summer in which you

1 filed unemployment, do you believe there was any
2 discriminatory reason related to that decision?

3 A That would call for knowledge that I don't
4 have. I don't know what the reason was behind it,
5 other than what I stated already.

6 Q Okay. Since that summer of filing for
7 unemployment, have you ever filed for unemployment
8 following -- you filed for unemployment the summer of
9 2008 or 2009. Since that time, have you ever filed
10 for unemployment again?

11 A Yes.

12 Q When?

13 A After my contract -- oh, 2011.

14 Q Did you receive it?

15 A Yes.

16 Q How long did you receive unemployment
17 benefits?

18 A I don't recall exactly how long. However
19 many months the State allows unemployment.

20 Q You're saying you received -- you received
21 unemployment benefits for the maximum amount of time
22 permissible?

23 A Yes.

24 Q Are you aware of whether Southeastern
25 submitted or voiced any objection to you receiving

Exhibit 5

Dr. Rachel Tudor
4595 West Spring Creek Pkwy
Apt. 2612
Plano, Texas 75024
rachel.tudor@yahoo.com

29 August 2017

Dear Members of the Search Committee:

I am an experienced higher education professional and am deeply committed to ensuring the success of Native American college students. I am writing to apply for the Director position at Southeastern Oklahoma State University's ("Southeastern") Native American Institute, because I strongly believe in and admire the work of the Institute and I believe that my unique qualifications, extensive experience in higher education, and deep connection to Southeastern make me an ideal fit for the position.

I am committed to the mission of the Native American Institute and believe my status as an enrolled and engaged member of the Chickasaw Nation will serve me well as the Director. As a Native American Serving Institution, it is imperative that Southeastern support and promote thriving in the Native American student community. The Institute is uniquely situated to address many of the obstacles Native American students face, such as financial need, difficulty adjusting to collegiate life, and culture shock. I also believe the Institute is well positioned to track and ameliorate structural barriers to achievement which plague the Native American student community at Southeastern. I know that I possess the community knowledge and capacity to steer the Institute and its students towards success. I have a deep connection to the Chickasaw Nation and the Choctaw Nation, with which we share a common descent and parallel recent histories. As a Chickasaw citizen, I will be able to connect with the Institute's students, drawing from our shared experiences, histories, and identities. As a Chickasaw citizen, I am keenly aware of internal developments in both the Chickasaw and Choctaw Nations, changes in social support services, education programs, and scholarship programs, and myriad other issues which effect many of Southeastern's Native American students. My experiences and my relationship with the Chickasaw Nation will also serve me well in strengthening the Institute's relationships and financial connections with Native American governments and grantors.

As Chickasaw citizen and first-generation college graduate, I intimately understand Native American students' need to create community and their desire to explore our unique heritage and experiences through campus events and activities. Native American students face unique obstacles to graduating on schedule and utilizing the full resources of the university community. Building a rich and capacious community on campus is key to ensuring Native American students stay engaged with their studies and that they seek out help when needed. My personal experiences creating connection and community on campuses give me unique insights into how best to build upon existing programming and interventions at the Institute. As an undergraduate I was heavily involved in the Native American Student Association ("NASA") at the University of Houston and learned first-hand how community support networks can help Native American

students thrive. While a member of NASA, I wrote and directed a play titled *The Trial of Columbus*, which was performed in the university's theater with a cast of Native American students, faculty, staff, and community members. This enrichment activity was a crucial part of why I succeeded in completing my undergraduate studies. I benefited from similar support as a graduate student. With the help of my community, I wrote poetry and was awarded a residential fellowship by the Virginia Center for the Creative Arts. Though each student's needs are slightly different, their desire for connection and community is universal. I wholeheartedly believe that my personal connection to the Chickasaw Nation, familiarity with other Nations represented in the Southeastern student community and experience as a first-generation student will undoubtedly help me identify interventions and programming opportunities well-suited to serving Southeastern's Native American students.

My unique insights into the Native American student community at Southeastern make me uniquely qualified for the Director position. During my seven years as an English professor at Southeastern, I worked closely and effectively with students, including many of whom were Native American, in and outside of the classroom. At Southeastern, I taught both undergraduate and graduate courses in Native American literature and culture. I carefully crafted these courses to reach non-Native students interested in the subjects as well as Native American students desiring to learn more about our shared culture. My effectiveness at teaching was repeatedly recognized by Southeastern during my time as a professor in the form of positive peer reviews of my classroom teaching, Department and University nominations and awards, and positive student reviews. Outside of the classroom, I worked with colleagues to enrich opportunities for Native American students at Southeastern by bringing renowned Native American scholars such as Rennard Strickland to campus and actively participated in Southeastern's annual Native American Symposium. During my time at Southeastern I also served two years on the Faculty Senate where I and my colleagues were charged with reviewing the programing, curriculum, and management of the university from the faculty perspective.

My passion for and considerable experience working in higher education makes me an ideal candidate for the Director position. I have spent my entire professional career working in higher education, endeavoring to share my passion for higher education and knowledge of Native American literature and culture with my students and the broader university communities I worked within. I received my PhD in English, with an emphasis in Native American Literature, from the University of Oklahoma. Since graduating from the University of Oklahoma, I have taught undergraduate and graduate courses on Native American literature and culture as well as courses on philosophy and writing at Southeastern, the University of Oklahoma, the University of Idaho, as well as several community colleges in Texas. I have also served as an official student mentor, assistant editor for student publications, and chair of undergraduate research conference presentations. My rich and varied experiences in higher education lend me a deep understanding of university communities as well as student needs in and outside of the classroom.

I also have a strong background in student programming, applying for funding, and evaluating funding applications as demonstrated by my work as a student and as a higher education professional. As an undergraduate at the University of Houston, I helped found the Native American Student Association ("NASA"). During my time with NASA, I served as NASA's

representative to the student senate, where I was involved in oversight and disbursement of student service fees, and on internal committees at NASA charged with planning activities for members and the university community. Among other things, I prepared and submitted a grant application for NASA to attend a Native American Symposium at Northeastern Oklahoma State University in Tahlequah, Oklahoma as well as funding to stage a production of an original play, *The Trial of Columbus*, in the university theater. As a student senator, I was also responsible for evaluating the grant applications of other student organizations. During my PhD studies at the University of Oklahoma, I contributed to success of the annual Returning the Gift festival which honored Native American authors and scholars. Among the honorees that I helped welcome to the event were Chickasaw author Linda Hogan, Creek author Susan Harjo, and Standing Rock Sioux author Tiffany Midge. I also volunteered to participate in a college prep course for Native American students held on the campus of the University of Oklahoma. At Southeastern, I served for several years on the Native American Symposium Committee, and played an active role in programing, scheduling, inviting guest speakers, promoting the event, applying for grants to fund the activities, and served as a co-editor of the Symposium's proceedings for several years. I also participated in the state's prestigious Oklahoma Scholar Leadership Enrichment Program, which funded bringing a renowned Native American scholar to Southeastern's campus for a course funded by the State of Oklahoma.

I also possess the requisite administrative and writing skills to succeed as the Institute's Director. I have extensive experience working in higher education, a keen eye, and a demonstrated aptitude for writing. I have spent my entire professional career in higher education and have a deep familiarity with Southeastern culture, resources, and administrative standards. I have also served on Department committees, university senates and subcommittees, and have been actively involved in student groups at Southeastern and other institutions. Taken together, these service activities have prepared me well for the Institute's work. I am adept at identifying on campus resources and need gaps. I am also well-organized and have an eye for detail, which will serve me well in tracking and highlighting activities and metrics at the Institute. I am also an able writer—I have published articles on a broad range of topics, including Native American literature, in academic journals and have substantial experience writing administrative reports and internal department memoranda. I am also comfortable working collaboratively with faculty, as demonstrated by my past university service at Southeastern. Additionally, my years of service on Southeastern's Faculty Senate gave me invaluable and unique insights into the oversight of any constitute part of the university, such as the Native American Institute. My special assignment to Southeastern's Faculty Senate Planning Committee and Faculty Senate's Personnel Policies Committee provided me additional skills and relevant experience that the Director needs. Among other things, the experience of serving on a committee that scrutinized the policies and procedures that Southeastern Oklahoma State University operated under makes me a uniquely qualified to make sure that the Native American Institute fulfills its mission objectives.

In sum, my experience, education, and dedication in the requisite areas of responsibility for the Director of the Native American Institute make me uniquely qualified for the position.

Cordially yours,
Dr. Rachel Tudor



Southeastern Oklahoma
State University

APPLICATION FOR STAFF (NON-FACULTY) EMPLOYMENT

Return to: **Human Resources** OR **Administration Building, 309** OR email to: **jmoore@se.edu**
 425 W. University Blvd. University Blvd. & 7th Avenue fax: (580) 745-7484
 Durant, OK 74701-0609

All applications submitted must be signed on the appropriate signature line by the applicant, regardless of the delivery method. Applications should be submitted by FAX, mail or personal delivery. (E-mail connection is not secure.) Unsigned or incomplete applications will not be considered.

TYPE OR PRINT IN INK

Date of Application: 08/29/2017 Date Available for Employment: 09/05/2017

PERSONAL

Name as shown on Social Security Records: (last) <u>TUDOR</u> (first) <u>RACHEL</u> (middle) <u>JONA</u>		
Mailing Address: <u>4595 W. SPRING CREEK PKWY 2612</u>		
City, State, Zip: <u>PLANO TX 75024</u>		
Home Phone: <u>(469) 562-9162</u>	Cell Phone: ()	Business Phone: ()
E-mail Address: <u>rachel.tudor@yahoo.com</u>		

POSITION

Specific position sought: DIRECTOR, NATIVE AMERICAN INSTITUTE

&/or add me to Applicant Pool for: Secretarial / Office Assistant / Clerical Custodial / Janitorial Grounds / Landscaping Police Officer
 Graduate Assistant Resident Assistant Skilled Trades Full Time Part Time

Other _____

Where did you hear of this opening? Job Board Website Word of mouth Campus distribution Publication, please list SE'S HR Website

Are you willing and able, with or without accommodation, to perform necessary job-related travel? Yes No

ELIGIBILITY FOR EMPLOYMENT

Are you legally eligible for employment in the United States? Yes No (Documentation of identity and employment eligibility must be provided upon hire as required by the Immigration Reform and Control Act of 1986.)

RELATIONSHIP TO UNIVERSITY EMPLOYEES

Are you related in any way to any University employee (includes in-laws)? Yes No (If yes) list name, relationship & department _____

*Regional University System Oklahoma & University policy states no two persons who are related by affinity (blood) or consanguinity (marriage) within the third degree shall be given positions in which either one is responsible for making recommendations regarding appointment, employment, promotion, salary or tenure for the other; nor shall either of two persons so related who hold positions in the same internal budgetary unit be appointed to an executive or administrative position for said internal unit.

Relatives that are within the third degree of relationship to an employee by blood or marriage are as follows: Spouse; parent; grandparent; great-grandparent; grandparent or great-grandparent of spouse; uncle or aunt; uncle or aunt of spouse; brother or sister; son or daughter; son-in-law or daughter-in-law; grandson or granddaughter or their spouse; great-grandson or great-granddaughter or their spouse.

SOUTHEASTERN APPLICATION FOR EMPLOYMENT

EDUCATION AND TRAINING

Are you a high school graduate or have you passed a general education development (GED) test? Yes No (will only be used as required by statute, law or bonafide job requirement)

Are you fluent in any language other than English? Yes No If yes, please specify: _____

(Include high school, vocational school and college/university & graduate school. Verification of all levels of education may be required. Official transcript, diploma, or certification will be required if offered a position, however, to meet application deadline, copies are acceptable.)

Name of School, College, University, and Graduate School	City, State	Number of Hours Completed	Diploma or Type of Degree Received	Area of Study / Major
University of Oklahoma	Norman, OK	required courses	PhD	English
University of Houston	Clear Lake, TX	required courses	MA	Humanities
University of Houston	Clear Lake, TX	required courses	BA	Multi-cultural Studies

PROFESSIONAL LICENSE / CERTIFICATIONS

List any professional or occupational license, registration or certification (i.e., Certified Public Accountant, Certified Procurement Officer, etc.) and attach copies

Professional License, Registration or Certification	Date Received	License Number if Applicable	Expiration Date	Licensing Agency or Board
XXXXXXXXXXXXXXXXXXXX				

Skills Inventory

Employment Related Skills Check appropriate answer and enter Years & Months on each line

	Proficient	Some Skill	No Skill	Years	Months
Computer Software:					
MS Word	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10+	
WordPerfect	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Excel	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	10+	
PowerPoint	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10+	
Access	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
MS Outlook	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10+	
Clerical:					
Accounting/Bookkeeping	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Data Entry	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Editing	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Filing	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Library	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Notary	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Payroll/Personnel Records	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Receptionist	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Technical Typing	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Telephone Sales	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
List Other					
Office Machines					
Facsimile (Fax)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10+	
Multi-Line Telephone	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	10+	
Voice Mail	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10+	
Document Scanner	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10+	
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Typewriter	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10+	
Typing Skill				30 wpm	Shorthand Skill _____ wpm
Custodial Services: NIA					
Chemical Knowledge	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Commercial Cleaning	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Stripper/Waxer/Buffer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Mechanical: NIA					
Heavy Equipment Diesel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Small Engine	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Maintenance: NIA					
Building	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Grounds	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Skilled Crafts: NIA					
Blueprint Reading	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Carpentry	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Electrical	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
HVAC	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Painting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Plumbing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Roofing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Water Treatment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Welding	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Equipment Repair	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
List any other applicable licenses, certificates, registrations or permits:					

Have you supervised or directed the work of others? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
Length of time _____ Number of persons _____					

SOUTHEASTERN APPLICATION FOR EMPLOYMENT

Computer Skills Would you consider yourself to be computer-literate? Yes No
 Have you used a computer in the workplace? Yes No Years/Months 20+ Have you used a computer for personal use? Yes No

REFERENCES

Please list at least **three** professional references other than relatives or previous employers.

1. Name: <u>DR. JOHN M. MISCHER</u>	2. Name: <u>MARGARET COTTER-LYNCH</u>
Address: <u>DEPT EHL @ SE</u>	Address: <u>DEPT EHL @ SE</u>
City, State, Zip: <u>DURANT OK 74701</u>	City, State, Zip: <u>DURANT OK 74701</u>
Telephone: <u>(580) 745-2000</u> email: <u>jmischer@se.edu</u>	Telephone: <u>(580) 745-2986</u> email: <u>mcott@se.edu</u>
Number of Years Acquainted: <u>10</u>	Number of Years Acquainted: <u>10</u>
Occupation: <u>PROFESSOR</u>	Occupation: <u>PROFESSOR</u>
3. Name: <u>DR. DANIEL ALTHOFF</u>	4. Name: <u>MARK SPENCER</u>
Address: <u>DEPT EHL @ SE</u>	Address: <u>DEPT EHL @ SE</u>
City, State, Zip: <u>DURANT, OK 74701</u>	City, State, Zip: <u>DURANT OK 74701</u>
Telephone: <u>(580) 745-2584</u> email: <u>dalthoff@se.edu</u>	Telephone: <u>(580) 745-2921</u> email: <u>m Spencer@se.edu</u>
Number of Years Acquainted: <u>10</u>	Number of Years Acquainted: <u>10</u>
Occupation: <u>PROFESSOR</u>	Occupation: <u>PROFESSOR</u>

EMPLOYMENT HISTORY

Have you previously worked for another Oklahoma state agency or a public college/university? Yes No University of Oklahoma
 If ANY employment was under a different name, indicate name: _____
 Have you ever been discharged or asked to resign from a job? Yes No If yes, explain below: _____

(Describe your work experience in detail, beginning with your current or most recent job. Include military service (indicate rank) and volunteer work. List each promotion or transfer as a separate job, even if they were with the same employer. If needed, attach additional copies of next page (pg 4). Employers and supervisors may be contacted regarding your work experience.)

EMPLOYMENT HISTORY (list most recent employer first)

1. Employer Information (most recent): Name: <u>COLLIN COLLEGE</u> Address: <u>2800 E SPRING CREEK PKWY</u> Telephone: <u>(972) 548-6240</u> Cell phone: () _____ Email address: _____		Supervisor Information: Name: _____ Title: _____ Telephone: () _____ Cell phone: () _____ Email address: _____	
Are you still employed with this company? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		If yes, may we contact your present employer as a reference? <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	
Position Information Job Title: <u>PROFESSOR</u> <input checked="" type="checkbox"/> Regular <input type="checkbox"/> Temporary <input checked="" type="checkbox"/> Full-time <input type="checkbox"/> Part-time		Employment Dates: From <u>9/2012</u> To: <u>5/2016</u> (month/year) (month/year)	

SOUTHEASTERN APPLICATION FOR EMPLOYMENT

Description of Duties and Work Performed (Be specific – attach extra signed and dated sheets, if necessary. Includes committee work):

See CV

Number of Employees Supervised: <input checked="" type="checkbox"/>	Ending Salary: \$ 58k	per: <input type="checkbox"/> hour <input type="checkbox"/> month <input checked="" type="checkbox"/> year	Hours worked per week: 40
Reason for Leaving: see addendum			

EMPLOYMENT HISTORY

<p>2. Employer Information (most recent):</p> <p>Name: <u>SOUTHEASTERN OKLAHOMA STATE UNIVERSITY</u></p> <p>Address: <u>1405 N. 4TH AVE, DURANT, OK 74701</u></p> <p>Telephone: <u>(580) 745-2000</u> Cell phone: ()</p> <p>Email address: _____</p>		<p>Supervisor Information:</p> <p>Name: _____</p> <p>Title: _____</p> <p>Telephone: () _____ Cell phone: () _____</p> <p>Email address: _____</p>	
<p>Are you still employed with this company? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>		<p>If yes, may we contact your present employer as a reference? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>	
<p>Position Information</p> <p>Job Title: <u>ASST PROFESSOR</u></p> <p><input checked="" type="checkbox"/> Regular <input type="checkbox"/> Temporary <input checked="" type="checkbox"/> Full-time <input type="checkbox"/> Part-time</p>		<p>Employment Dates: From <u>8/2004</u> To: <u>5/2011</u></p> <p>(month/year) (month/year)</p>	
<p>Description of Duties and Work Performed (Be specific – attach extra signed and dated sheets, if necessary. Includes committee work):</p> <p>See CV</p>			
Number of Employees Supervised: <input checked="" type="checkbox"/>	Ending Salary: \$ <u>Approx 48k</u>	per: <input type="checkbox"/> hour <input type="checkbox"/> month <input checked="" type="checkbox"/> year	Hours worked per week: 40
Reason for Leaving: see addendum			

SOUTHEASTERN APPLICATION FOR EMPLOYMENT

3. Employer Information (most recent): Name: <u>COLLEGE OF THE MAINLAND</u> Address: <u>1200 N. AMBURN RD, TEXAS CITY, TX</u> Telephone: <u>(409) 938-1211</u> Cell phone: () _____ Email address: _____		Supervisor Information: Name: _____ Title: _____ Telephone: () _____ Cell phone: () _____ Email address: _____	
Position Information Job Title: <u>PROFESSOR</u> <input checked="" type="checkbox"/> Regular <input type="checkbox"/> Temporary <input checked="" type="checkbox"/> Full-time <input type="checkbox"/> Part-time		Employment Dates: From <u>08/2002</u> To: <u>05/2004</u> (month/year) (month/year)	
Description of Duties and Work Performed (Be specific – attach extra signed and dated sheets, if necessary. Includes committee work): <p style="text-align: center;"><u>see CV</u></p>			
Number of Employees Supervised: <u>0</u>	Ending Salary: \$ <u>50k</u>	per: <input type="checkbox"/> hour <input type="checkbox"/> month <input checked="" type="checkbox"/> year	Hours worked per week: <u>40</u>
Reason for Leaving: <u>Accept job at Southeastern</u>			

4. Employer Information (most recent): Name: <u>UNIVERSITY OF IDAHO</u> Address: <u>875 PERIMETER RD, MOSCOW, ID</u> Telephone: <u>(208) 885-6111</u> Cell phone: () _____ Email address: _____		Supervisor Information: Name: _____ Title: _____ Telephone: () _____ Cell phone: () _____ Email address: _____	
Are you still employed with this company? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		If yes, may we contact your present employer as a reference? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Position Information Job Title: <u>VISITING ASSISTANT PROFESSOR</u> <input checked="" type="checkbox"/> Regular <input type="checkbox"/> Temporary <input checked="" type="checkbox"/> Full-time <input type="checkbox"/> Part-time		Employment Dates: From <u>09/2001</u> To: <u>05/2002</u> (month/year) (month/year)	
Description of Duties and Work Performed (Be specific – attach extra signed and dated sheets, if necessary. Includes committee work): <p style="text-align: center;"><u>see CV</u></p>			
Number of Employees Supervised: <u>0</u>	Ending Salary: \$ <u>Do not recall</u>	per: <input type="checkbox"/> hour <input type="checkbox"/> month <input type="checkbox"/> year	Hours worked per week: <u>40</u>
Reason for Leaving: <u>Accept job at College of Mainland</u>			

* (If you have more than four separate periods of employment, complete a blank sheet in the above format; sign and attach to this application.)

Use this space for any additional information, comments, or explanations you may have that are pertinent to your application.

APPLICANT'S STATEMENT OF CERTIFICATION AND AGREEMENT

Accuracy of Information – By signing this application, I certify that the information supplied in this application and in any other form, oral or written, is true and accurate.

Falsification of Information – I understand and agree that any misstated, misleading, incomplete or false information is grounds for my disqualification from consideration for employment, for withdrawal of any offer of employment if an offer has been made, or for my immediate discharge if employment has already commenced, whenever, and however discovered. I also understand that Section 358(B) of Title 21 of the Oklahoma Statutes prohibits applicants for state employment from making a materially false, fictitious, or fraudulent statement or representation on any employment application, knowing such statement or representation to be materially false, fictitious, or fraudulent. Violation is a criminal offence, punishable by fine and/or imprisonment.

Verification of Information – I hereby authorize Southeastern Oklahoma State University to verify the information I have provided in my employment application, in my oral statements and in any other documents or supplemental information I have provided to this agency for the purposes of employment. This shall include the authorization to conduct any and all personal background checks, including but not limited to, criminal history and related records, education and employment background records, civilian and military court records and/or proceedings. I authorize my former employers and job-related references to provide any information requested by Southeastern Oklahoma State University. I release from liability and hold harmless the State of Oklahoma, Southeastern Oklahoma State University, the Regional University System of Oklahoma Board, employees and attorneys, along with any corporation, firm, person, organization or individual providing information to Southeastern Oklahoma State University, from any and all claims, liabilities, loss, demands and causes of action known and unknown, fixed or contingent, equitable, legal or administrative, accrued to me as a result of such disclosure of information concerning me.

Employment Eligibility – I understand that if I am hired I will be required to produce proof that I have a legal right to work in the U.S.A. in accordance with the Immigration Reform and Control Act of 1986. This agency verifies the identity and employment eligibility status of all newly hired employees utilizing the Form I-9 verification process as well as the E-Verify Program with the Department of Homeland Security and the Social Security Administration.

General – If selected for employment, I agree to conform to the policies, rules and regulations of Southeastern Oklahoma State University and the Regional University System of Oklahoma. With this application, I agree to the University's overtime pay policy for non-exempt employees, which allows giving compensatory time off in lieu of payment of overtime worked. I understand that the position for which I am submitting this application may be at-will. The applicant selected for any at-will position will serve at the will of the University. If selected for a position, I understand my employment and compensation can be terminated, with or without cause, and with or without notice, at any time, at the option of either Southeastern Oklahoma State University or myself. I understand that no representative of the University has any authority to enter into any agreement for continued employment for any specified period of time or to make any agreement contrary to the foregoing. If an employee resigns or is discharged, full payment for unused annual leave (excludes sick leave and personal leave) will be made upon approval of the Vice President for Business Affairs, provided the employee has worked for a continuous six-month period and appropriate notice was given. No payment for annual leave will be authorized for any person who has not completed at least six months of continuous employment at the University. Any compensatory time accrued and not used will be paid the month following final paycheck.

Rachel Tucker

Signature Required

8/24/17

Date

Southeastern Oklahoma State University, in compliance with all applicable federal and state laws and regulations, does not discriminate on the basis of race, color, religion, national origin, sex, age, disability, sexual orientation, gender identity, or status as a veteran in any of its policies, practices, procedures, or programs. This includes, but is not limited to: admissions, employment, financial aid, and educational services. Inquiries regarding non-discrimination and equity policies may be directed to: Michael Davis, Director of Compliance and Safety & Title IX Coordinator, (580) 745-3090, or mdavis@se.edu, Administration Building Room 311 – 1405 N. 4th Ave. Durant, OK 74701.

Dr. Rachel Tudor's
Addendum to Staff (Non-Faculty) Employment Application
Supplementing Answers to Employment History

Previous work for another Oklahoma state agency or public college/university: I previously worked at the University of Oklahoma as a graduate teaching assistant during my PhD studies and as a post doctoral scholar after I received my PhD.

Previous names: Robert Tudor, T.R. Tudor

Have you ever been discharged or asked to resign from a job:

Southeastern. I was a tenure-track English professor at Southeastern from Fall 2004 through Spring 2011. During the tenure and promotion application process in 2009-10 and 2010-11 I encountered discrimination and retaliation from administrators at Southeastern. I filed grievances and complaints at Southeastern and with the U.S. Equal Employment Opportunity Commission. Southeastern made the decision to not renew my contract in or around March 2011. At present, I am a plaintiff in a federal Title VII lawsuit wherein I am grieving the aforementioned issues in court. My lawsuit is styled as *United States and Dr. Rachel Tudor v. Southeastern Oklahoma State University and Regional University System of Oklahoma*, 3:15-cv-324-C (W.D.Okla. filed Mar. 30, 2015).

Collin College. My contract at Collin College was non-renewed in Spring 2016.

Rachel Tudor

4595 West Spring Creek Parkway
Apt. 2612, Plano, Texas 75024
rachel.tudor@yahoo.com

Education

- 2000 Ph.D. English, University of Oklahoma
Concentration: *American and Native American Literature & Modernity and Theory*
Dissertation: *The Native American Postmodern Mimetic Novel*
- 1994 M.A. Humanities, University of Houston-Clear Lake
Concentration: *Philosophy*
Thesis: *Genocide, Imperialism, and Neocolonialism: A Native American Critique of Literature*
- 1991 B.A. Multi-Cultural Studies, University of Houston-Clear Lake
Concentration: *History*

Academic Teaching Experience

- 2012–2016 Professor of English, Collin College
- 2004–2011 Assistant Professor of English and Humanities, Southeastern Oklahoma State University
- 2002–2004 Professor of Humanities, College of the Mainland
- 2001–2002 Visiting Assistant Professor of English, University of Idaho
- 2000–2001 Post-Doctoral Lectureship, Meritoriously Awarded Position, University of Oklahoma
- 1997–2000 Teaching Associate, University of Oklahoma
- 1995–1997 Teaching Assistant, University of Oklahoma

Professional Interests

Philosophy
Modernity and Theory
American and Native American Literature

Effective Teaching

Courses Taught at Collin College

English 1301 *Composition I (including dual credit)*
English 1302 *Composition II (including dual credit)*
English 2332 *World Literature I*

English 2333 *World Literature II*
English 2327 *American Literature I*

Courses Taught at Southeastern Oklahoma State University

Internet Courses

Humanities 1213 *Ancient to Medieval*

Hybrid Courses

English 1113 *Intro to Composition*
English 1213 *Composition*
Humanities 1213 *Ancient to Medieval*
Philosophy 1213 *Intro to Philosophy*

New Courses

Oklahoma Scholar Leadership Enrichment Program: *Native American Life, Law, and Literature*

This course was created with the assistance of the renowned Native American legal scholar Dr. Rennard Strickland and introduces students to current events in Native American law, life, and literature through the prism of American jurisprudence.

English 4853 *Great Books*
English 4563/5103 *Native American Literature*

Other Courses at Southeastern

English 1113 *Intro to Composition*
English 1213 *Composition*
English 2313 *Intro to Literature*
English 4563/5103 *Native American Literature*
Humanities 1213 *Ancient to Medieval*
Philosophy 2113 *Intro to Philosophy*

Courses Taught at College of the Mainland

English 1301 *Composition and Rhetoric in Communication*
English 1302 *Composition and Reading*
English 2328 *American Literature II*
Humanities 1301 *Ancient to Medieval*
Humanities 1302 *Renaissance to Modern*
Philosophy 2306 *Ethics*

Courses Taught at the University of Idaho

English 208 *Personal and Expository Writing*
English 295 *American Indian Drama*

English 484 *American Indian Literature*

Courses Taught at the University of Oklahoma

English 1113 *College Composition I*
 English 1213 *College Composition II*
 English 2213 *Introduction to Fiction*
 English 2223 *Poetry*

Publications

Articles:

- 2012 “The Ethics and Ethos of Eighteenth-Century British Literature.” *ASEBL Journal*. Volume 8. Issue 1, January (2012)
- 2011 “Genre and the Native American Novel.” *Parnassus: An Innovative Journal of Literary Criticism*. Issue 2/3, July (2011)
- 2011 “Sara Suleri: A Study in the Idioms of Dubiety and Migrancy in *Boys Will Be Boys* and *Meatless Days*.” *disClosure: A Journal of Social Theory*. 20th Anniversary Issue, April (2011)
- 2011 “*Pearl*: A Study in Memoir and First-Person Narrative Poetry.” *Diesis: Footnotes on Literary Identities*. Spring (2011)
- 2010 “A Reading of Jonathan Swift’s ‘A Modest Proposal’ Using Roman Jakobson’s Poetic Function.” *The Atrium: A Journal of Academic Voices*. Winter (2010)
- 2010 “Romantic Voyeurism and the Idea of the Savage.” *The Texas Review*. Spring/Summer (2010)
- 2010 “Memoir as Quest: Sara Suleri’s *Meatless Days*.” *Research and Criticism*. Special Issue on Contemporary Literature and Theory. Volume 1 (2010)
- 2010 “N. Scott Momaday’s *The Ancient Child* and the American Dime Novel.” *Indian Review of World Literature in English*, Volume 6, Number II, July (2010)
- 2010 “*House Made of Dawn*: A New Interpretation.” In *Diasporic Consciousness: Literature From the Postcolonial World*. Ed. Smirti Singh. Berlin, Germany: VDM Verlag, 2010 ISBN: 3639302036
- 2010 “Latin American Magical Realism and the Native American Novel.” *Teaching American Literature: A Journal of Theory and Practice*. Spring/Summer (2010)
- 2009 “Historical and Experiential Postmodernism: Native American and Euro-American.” *Journal of Contemporary Thought*. Winter (2009)

Editor:

2014–2016 Reviewer. *Quest*: Collin College’s Undergraduate Research Journal

2008 Co-Editor. Symposium *Proceedings*. “Sixty-Seven Nations and Counting: Proceedings of the Seventh Native American Symposium.”

2006 Co-Editor. Symposium *Proceedings*. “Native Women in the Arts, Education, and Leadership: Proceedings of the Sixth Native American Symposium.”

Book Review:

1997 Book Review. *Outlaws, Renegades, and Saints: Diary of a Mixed-Up Halfbreed*. Tiffany Midge. *World Literature Today*. Winter, 1997

1996 Book Review. *Deadly Medicine*. Peter C. Mancall. *American Indian Libraries Newsletter*. Winter 1996

1995 Book Review. *Shadow Distance: A Gerald Vizenor Reader*. Comp. A. Robert Lee. *American Indian Libraries Newsletter*. Spring, 1995

Creative:

2007 Open-Mic Chapbook. *Alien Nations*

2005 Open-Mic Chapbook. *Diaspora*

1992 Play. *The Trial of Columbus*

Committees and Special Assignments

Collin College

2012–2016 *English Sourcebook Committee*

- Compiled and edited a sourcebook for English faculty

2012–2016 *Curriculum Review Committee*

- Review English curriculum and proposed changes to the curriculum

2014–2016 Chair, *Interdisciplinary Colloquium*

- Led monthly colloquiums on philosophy and teaching

2014–2015 *English Faculty Search Committee*

- Reviewed applications of prospective faculty members

- Interviewed prospective faculty
- Participated in deliberations and evaluations of applicants

2014–2016 *Mentor*, Collin College Mentor Program

- Mentor undergraduate students

2013–2014 *Panel Chair*, Collin College Undergraduate Research Conference

- Recruited student participants
- Edited student papers
- Supervised presentations

Southeastern Oklahoma State University

2010–2011 *Faculty Senate Personnel Policies Committee*

- Reviewed and assessed policy and procedure changes in reference to their impact on the faculty
- Proposed policy changes to the Faculty Senate in reference to salary, teaching, and tenure

20092011 *Faculty Senate*

- Reviewed, evaluated, and made recommendations for changes in undergraduate and graduate academic policies and procedures
- Reviewed and made recommendations for changes in the Policy and Procedures Manual

20092010 *Faculty Senate Planning Committee*

- Facilitated the development and implementation of long-term goals relating to curriculum

20072010 *Chair, Assessment, Planning, and Development Committee, Department of English, Humanities, and Languages*

- Wrote yearly assessment report for the department
- Compiled, distributed, and tabulated department assessment of upper-level capstone student papers
- Compiled, distributed, and tabulated department assessment of junior-level student papers
- Organized meetings and agendas

20042010 *Native American Symposium Committee*

- Moderated panels
- Recommend themes and speakers
- Edited the 6th and 7th Symposium proceedings
- Provided transportation for speakers and guests to and from hotels and Dallas Airport

2007 *Oklahoma Scholar Leadership Enrichment Program*

- Assisted Dr. Rennard Strickland prepare a course curriculum and syllabus for program

- Served as local director and supervising professor of Dr. Strickland's course
- Graded student presentations and papers

2004–2011 *Hiring Committee*

- Reviewed applications of prospective faculty members
- Interviewed prospective faculty
- Participated in deliberations and evaluations of applicants

2004–2011 *Five-Year Program Review Committee*

- Compiled pertinent paperwork
- Contributed to review of curriculum
- Assisted outside reviewer with assessment report

2004–2007 *Assessment, Planning, and Development Committee, Department of English, Humanities, and Languages*

- Evaluated upper-level capstone student papers
- Evaluated junior-level student papers
- Participated in regular meetings and deliberations of committee

College of the Mainland

2002–2004 *Curriculum Committee*

- Recommended revisions of curriculum to align with Texas' *Academic Course Manual*
- Reviewed new course proposals

2002–2004 *Multi-Cultural Team*

- Organized multicultural activities on campus
- Promoted and publicized events
- Invited speakers to campus
- Hosted guest speakers on campus

2002–2004 *Estrella Award Committee*

- Reviewed nominees and applications for award to honor outstanding Hispanic student leaders in the community

University of Idaho

2001–2002 *Native American Advisory Board*

- Advised on issues important to the Native American community
- Liaison between the university and local Native American tribes

Professional Activities

- 2017 Presentation. "Post-Truth America: A Native American Guide to Survivance." Guest Lecture. Ramapo College, Mahwah, New Jersey
- 2016 Presentation. "Using Pericles' *Funeral Oration* to Teach Argument." Trends in Teaching College Composition Conference. Collin College, Plano, Texas
- 2015 Presentation. "An Experiential Discourse on Gender and Race in Faculty Affective Relations, Community Formations, and Pedagogic Practices." Texas Tech Comparative Literature Conference. Texas Tech University, Lubbock, Texas
- 2014 Presentation. "Teaching Argument as a Civic Virtue." Trends in Teaching College Composition Conference. Collin College, Plano, Texas
- 2013 Presentation. "Using Teams to Facilitate Collaborative Learning and Critical Thinking." Trends in Teaching College Composition Conference. Collin College, Plano, Texas
- 2012 Presentation. "Integrating Native American Literature into the Curriculum." Faculty Colloquium. Collin College, Plano, Texas
- 2011 Presentation. "Modern Media's Translation of Greece's Atavistic Myths." 13th Annual McCleary Interdisciplinary Symposium. Texas Southern University, Houston, Texas
- 2009 Presentation. "Native American Protest Fiction." 11th Annual McCleary Interdisciplinary Symposium. Texas Southern University, Houston, Texas
- 2007 Art Exhibit. "Kachinas and Gourds." Centre Art Gallery, Juried Art Show, Southeastern Oklahoma State University, Durant, Oklahoma
- 2005 Presentation. "The Lynching of Ward Churchill." Sixth Annual Native American Symposium. Southeastern Oklahoma State University, Durant, Oklahoma
- 1998 Presentation. "Charlotte Bronte's Indians" SAGES Conference, University of Oklahoma, Norman, Oklahoma
- 1996 Presentation. "Self-Selected and Other-Attributed Gender Performance: A Theoretical and Experiential Investigation." Culture Studies/Cultural Intervention, University of Colorado, Boulder, Colorado
- 1995 Presentation. "What is Native American Literature?" Southwest/Texas Popular Culture Association, Regional Meeting, Oklahoma State University, Stillwater, Oklahoma
- 1994 Presentation. "Suicide or Genocide? Self-Inflicted Death in Native American Novels." English Graduates for Academic Development. Annual Conference, East Texas State University, Commerce, Texas
- 1992 Director. *The Trial of Columbus*. Performed at the Mecothea Theater, Houston, Texas

Professional Training and Continuing Education

2016 *Faculty Development Day Conference*. Collin College

- Using Microsoft Office Templates to Work Smarter
- Strange Attractors: Mathematics and Poetry
- Facilitating Mindful Practices in the Classroom
- Social Media in the Classroom
- Evaluating Group Work in Distance Education

2015 *Faculty Development Day Conference*. Collin College

- Google Tools for Education
- The Library as Textbook
- Creativity in Teaching
- Apps for a More Efficient Workflow
- Pythagoreans: The Mystical Mathematicians

2014 *Faculty Development Day Conference*. Collin College

- Composition Revision: Cultivating a Critical Eye
- Integrating Marginalized Women into the Curriculum
- How to use Smartphones and iPad for Educational Purposes
- Death by PowerPoint
- Establishing Class Consciousness

2013 *Faculty Development Day Conference*. Collin College

- Using E-Books for Research Effectively
- Using Streaming Audio and Video in the Classroom
- Teaching Teamwork Skills
- Teaching Social Responsibility
- Teaching Critical Thinking

2012 *Faculty Development Day Conference*. Collin College

- Writing and Memory
- Beyond YouTube
- Ancient, Medieval, and Modern Metaphors
- Teaching Innovative Perspectives and Strategies
- Character, Conflict, Resolution: Educating Students Through Storytelling

2011 *Faculty Grant Writing Workshop*, Dr. Kathryn Plunkett, Digital Information Literacy Librarian, Southeastern Oklahoma State University

2009 *PowerPoint to Windows Media Player*, Center for Instructional Development and Training, Southeastern Oklahoma State University

- 2009 *SMARTBoard Basics*, Center for Instructional Development and Training, Southeastern Oklahoma State University
- 2009 *Getting Started: Toward Online Teaching*, The Sloan Consortium
- 2009 *Blackboard Assessments*, Center for Instructional Development and Training, Southeastern Oklahoma State University
- 2009 *PowerPoint to Windows Media Video*, Center for Instructional Development and Training, Southeastern Oklahoma State University
- 2009 *Respectful Workplace*, Southeastern Organizational Leadership Development, Southeastern Oklahoma State University
- 2009 *Legal Aspects of the Faculty*, Southeastern Organizational Leadership Development, Southeastern Oklahoma State University
- 2008 *On Media, Culture, Violence, and the College Student*, Southeastern Office of Violence Prevention, Southeastern Oklahoma State University
- 2008 *Teacher Tube*, Center for Instructional Development and Training, Southeastern Oklahoma State University
- 2008 *BlackBoard Discussion Forums*, Center for Instructional Development and Training, Southeastern Oklahoma State University
- 2008 *Using Microsoft Office Powerpoint*, Center for Instructional Development and Training, Southeastern Oklahoma State University
- 2007 *New Technologies for Enhancing Instruction*, Center for Instructional Development and Training, Southeastern Oklahoma State University
- 2007 *Customizing Your Blackboard Course*, Center for Instructional Development and Training, Southeastern Oklahoma State University
- 2007 *Grading Documents Electronically*, Center for Instructional Development and Training, Southeastern Oklahoma State University
- 2003 *Introduction to Microsoft Powerpoint*, Department of Continuing Education, College of the Mainland, Texas City, Texas
- 2003 *Interactive Instruction Training*, Department of Continuing Education, College of the Mainland, Texas City, Texas

Awards and Honors

- Bishop-Baldwin, Barton & Phillips Civil Rights Advocacy Award, Oklahomans for Equality, 2016
- Faculty Senate Recognition Award for Excellence in Scholarship, Southeastern Oklahoma State University, 2011

Writer of the Year, Wordcraft Circle of Native Writers and Storytellers, 2000
 Post-Doctoral Lectureship, University of Oklahoma, 2000
 Residential Writing Fellowship, Virginia Center for the Creative Arts, 2000
 Merit Tuition Scholarship, University of Oklahoma, 1996-1999
 Roy and Florena Hadsell Award for Research, University of Oklahoma, 1995
 Sigma Tau Delta, Rho Omega Chapter of the National English Honor Society, 1993
 Omicron Delta Kappa, Atrium Circle Chapter of the National Leadership Honor Society, 1992

Professional Memberships

- Modern Language Association
- Wordcraft Circle of Native Writers and Storytellers

References

- **Dr. Margaret Cotter-Lynch** (Professor) Department of English, Humanities, and Languages, School of Arts & Sciences, Southeastern Oklahoma State University, 1405 North 4th Avenue, Durant, Oklahoma, 74701. mcotter@se.edu (580) 745-2986
- **Dr. Michael Schueth** (Professor) Department of English and Humanities, School of Arts and Sciences, Collin College, 2800 East Spring Creek Parkway, Plano, Texas, 75074. mschueth@collin.edu (972) 516-5083
- **Dr. Daniel Althoff** (Professor) Department of English, Humanities, and Languages, School of Arts & Sciences, Southeastern Oklahoma State University, 1405 North 4th Avenue, Durant, Oklahoma, 74701. dalthoff@se.edu (580) 745-2584
- **Dr. Mark Spencer** (Professor) Department of English, Humanities, and Languages, School of Arts & Sciences, Southeastern Oklahoma State University, 1405 North 4th Avenue, Durant, Oklahoma, 74701. mspencer@se.edu (580) 745-2921
- **Dr. John Mischo** (Professor) Department of English, Humanities, and Languages, School of Arts & Sciences, Southeastern Oklahoma State University, 1405 North 4th Avenue, Durant, Oklahoma, 74701. jmischo@se.edu (580) 745-2000

NAME (LAST, FIRST, MIDDLE) TUDOR II, R. ID NUMBER _____ SEX F BIRTH PLACE: BRISTO, OK BIRTH DATE: 07-26-XX HIGH SCHOOL NAME: NOT APPLICABLE HIGH SCHOOL ADDRESS: _____					Student Record		PH.D. DEGREE AND DATE 05-06-2000 INT DATE 05/04/01		
COURSE TITLE DEPT. NO. HRS. GRADE					COURSE TITLE DEPT. NO. HRS. GRADE				
UNIV OF HOUSTON-CLEAR LAKE, HOUSTON, TX: B.A. MAY 1991.					INTERPRETATION OF GRADES A = Excellent B = Good C = Average D = Poor F = Failing I = Incomplete AW = Admin. Withdrawal W = Withdrawn S = Satisfactory U = Unsatisfactory P = Pass NP = No Pass AU = Audit X = Work in Progress E = Conditional WF = W Failing N = No Report				
UNIV OF HOUSTON-CLEAR LAKE, HOUSTON, TX: M.A. MAY 1994.					GRADE POINTS PER SEM HOUR SINCE 1950 A = 4 D = 1 B = 3 F = 0 C = 2 WF = 0 Other Grades Not Computed in GPA				
FALL 1994 GRAD COL ENGL BEGIN CHOCTAW I ANTH 1713 - W ADV LIT ANALYSIS ENGL 5003 3 A 20TH CNT AM IND LIT ENGL 5803 3 A TERM: GPH 6 GPS 24 HA 6 HE 6 GPA 4.00					SPRING 1997 (CONTINUED) SPANISH READING SPAN 2113 3 A TERM: GPH 6 GPS 24 HA 6 HE 6 GPA 4.00 FALL 1997 GRAD COL ENGL BEGIN CHEROKEE II ANTH 1723 3 A FRENCH FOR READING FR 1013 3 A TERM: GPH 6 GPS 24 HA 6 HE 6 GPA 4.00 SPRING 1998 GRAD COL ENGL RES DRS DISSERT ENGL 6980 3 S FRENCH FOR READING FR 1023 3 A TERM: GPH 3 GPS 12 HA 6 HE 6 GPA 4.00 FALL 1998 GRAD COL ENGL RES DRS DISSERT ENGL 6980 6 X ADMITTED TO CANDIDACY-DOCTORAL DEGREE TERM: GPH 0 GPS 0 HA 6 HE 0 GPA 0.00 SPRING 1999 GRAD COL ENGL RES DRS DISSERT ENGL 6980 6 X TERM: GPH 0 GPS 0 HA 6 HE 0 GPA 0.00 FALL 1999 GRAD COL ENGL RES DRS DISSERT ENGL 6980 6 X TERM: GPH 0 GPS 0 HA 6 HE 0 GPA 0.00 SPRING 2000 GRAD COL ENGL RES DRS DISSERT ENGL 6980 6 S DISSERTATION: THE NATIVE AMERICAN POSTMODERN-MIMETIC NOVEL TERM: GPH 0 GPS 0 HA 6 HE 6 GPA 0.00 . END OF RECORD .				
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SPRING 1995 GRAD COL ENGL ROMANTICISM LANG/IDN ENGL 5003 3 B TEACH COLL COMP/LIT ENGL 5113 3 A TERM: GPH 9 GPS 33 HA 9 HE 9 GPA 3.67									
FALL 1995 GRAD COL ENGL ENGL ROMANTIC POETS ENGL 4623 3 A FEMINISM/POSTMODERN ENGL 5003 3 A TERM: GPH 6 GPS 24 HA 6 HE 6 GPA 4.00									
SPRING 1996 GRAD COL ENGL CONT CRIT THOUGHT EDFN 5823 3 A DIRECTED READINGS ENGL 5960 3 S TERM: GPH 3 GPS 12 HA 6 HE 6 GPA 4.00									
FALL 1996 GRAD COL ENGL METHODS-GRAD STUDY ENGL 5903 3 A BEGIN CHEROKEE I ANTH 1713 3 A									

ISSUED TO STUDENT

Richard Skel



Director, Academic Records

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TUDOR, T R III

Prepared: 06/01/99
 Page # 1

COURSE NO	COURSE TITLE	HRS	GRADE	COURSE NO	COURSE TITLE	HRS	GRADE
Transferred From							
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461-17-6848 U/DS SPRING 1989				461-17-6848 G/DS FALL 1991			
ASTR 3131	MODERN ASTRONOMY I	3	A	FUTR 5131	STUDY OF THE FUTURE	3	B
BIOL 3332	BIO-ECOLOGY	3	A	FUTR 5132	QUALITATIVE FUTURES	3	WX
(SHR: 6 GPA: 4.000) (THR: 6 GPA: 4.000)				(SHR: 6 GPA: 3.500) (THR: 12 GPA: 3.667)			
461-17-6848 U/DS SUMMER 1989				461-17-6848 G/DS SPRING 1992			
BIOL 4931	TOPIC:FIELD BIOLOGY	3	A	COMM 5733	SEMNR IN WRITING FICTION	3	B+
COMM 3135	TECHNICAL WRITING	3	B	FUTR 6234	VISIONARY FUTURES	3	B A
(SHR: 6 GPA: 3.500) (THR: 12 GPA: 3.750)				LITR 4237 VICTORIAN LITERATURE			
				LITR 5537 AMERICAN POETRY			
				(SHR: 12 GPA: 3.833) (THR: 24 GPA: 3.750)			
461-17-6848 U/DS FALL 1989				461-17-6848 G/DS SUMMER 1992			
BIOL 3133	PLANT ANATOMY	3	B	LITR 5034	WORKSHOP IN POETICS	3	A-
BIOL 4231	MARINE BIOLOGY	3	A	LITR 5931	TOPIC:AMERICAN DRAMA	3	A A
BIOL 4336	GENETICS	3	C	(SHR: 6 GPA: 3.834) (THR: 30 GPA: 3.767)			
MATH 3038	COMPUTATIONAL STATISTICS	3	WX	461-17-6848 G/DS FALL 1992			
(SHR: 9 GPA: 3.000) (THR: 24 GPA: 3.429)				HIST 5031 RESEARCH & METHODS SEMINAR			
				HUMN 5931 TOPIC:AMERICAN PHILOSOPHY			
				LITR 5538 CONTEMPORARY AMERICAN LITR			
				LITR 5939 IS:CONT MINORITY LITERATURE			
				(SHR: 12 GPA: 3.834) (THR: 42 GPA: 3.786)			
461-17-6848 U/DS SPRING 1990				461-17-6848 G/DS SPRING 1993			
ANTH 4532	INTRO ARCHAEOLOGY & PREHISTORY	3	A	HIST 5035	PHILOSOPHY OF HISTORY	3	A
COMM 3037	ADVANCED WRITING	3	B	LITR 6939	MASTER'S THESIS RESEARCH	3	CR
HUMN 3031	BASIC TEXTS WSTRN TRADITION I	3	A	LITR 6939	MASTER'S THESIS RESEARCH	3	CR
LITR 3334	MYTHOLOGY	3	B	(SHR: 3 GPA: 4.000) (THR: 45 GPA: 3.800)			
(SHR: 12 GPA: 3.500) (THR: 33 GPA: 3.455)				461-17-6848 G/DS SUMMER 1993			
				EDUC 5931 TOPIC:COGNITION AND INSTRUCTION			
				LITR 6939 MASTER'S THESIS RESEARCH			
				(SHR: 3 GPA: 4.000) (THR: 48 GPA: 3.813)			
461-17-6848 U/DS SUMMER 1990				461-17-6848 G/DS FALL 1993			
PSYC 4131	SOCIAL PSYCHOLOGY	3	A	HUMN 5336	PHILOSOPHY AND RELIGION	3	A
SOCI 4535	MINORITIES IN AMERICA	3	A	LITR 6939	MASTER'S THESIS RESEARCH	3	CR
(SHR: 6 GPA: 4.000) (THR: 39 GPA: 3.538)				PHIL 5939 IS:FEMINIST PHILOSOPHY			
				(SHR: 6 GPA: 4.000) (THR: 54 GPA: 3.833)			
PRESIDENT'S LIST				461-17-6848 U/DS SPRING 1991			
				ANTH 3136 ANTHROPOLOGY OF RELIGION			
				ANTH 4334 INDIANS OF NORTH AMERICA			
				HIST 4839 NATIVE AMERICAN HISTORY			
				PSYC 4839 PSYCHOLOGYRESEARCH			
				SILC 4135 THEORIES OF AMERICAN PLURALISM			
				SOCI 4132 SOC STRUCTUR:CLASS,POWER,STATUS			
				(SHR: 18 GPA: 4.000) (THR: 69 GPA: 3.652)			
				LITR 4238 RISE DEVELOP ENGLISH NOVEL			
				LITR 6939 MASTER'S THESIS RESEARCH			
				LITR 6939 MASTER'S THESIS RESEARCH			
				(SHR: 9 GPA: 4.000) (THR: 63 GPA: 3.857)			
				Name: TUDOR, T R III			
				Degree: MASTER OF ARTS			
				Major: HUMANITIES			
				Conferred: MAY 14, 1994			

				***** End of Transcript *****			

				461-17-6848 U/DS SUMMER 1991			
				SOCI 5432 STUDIES IN EUROPEAN HIST			
				SOCI 5238 NEGOTIATING ACROSS CULTURES			
				(SHR: 6 GPA: 3.834) (THR: 6 GPA: 3.834)			



Dorella L. Banks

Dorella L. Banks, Registrar
 University of Houston-Clear Lake

Exhibit 6

From: **Ezra Young** ezra@ezrayoung.com

Subject: Re: Tudor - Defendants' Exhibits

Date: **November 13, 2017 at 11:52 PM**

To: Lori Cornell lori.cornell@oag.ok.gov

Cc: Dixie Coffey dixie.coffey@oag.ok.gov, Jeb Joseph jeb.joseph@oag.ok.gov, Tim Bunson tim.bunson@oag.ok.gov,

Kindanne Jones kindanne.jones@oag.ok.gov, Brittany Novotny BNovotny@nationlit.com, megalindo@thegalindolawfirm.com

EY

Lori:

Please provide us with Defendants final exhibit list. As a courtesy—and in line with your prior representations—please provide the redline or otherwise mark what you have changed.

203: To the extent you intend to present this exhibit at a later hearing involving Judge Cauthron regarding the reinstatement issue, please provide us with a hard copy and electronic format version properly marked by the end of the day on Tuesday November 14, 2017.

133: Tudor objects to this exhibit on both relevancy ground and because it is inappropriately late. Defendants were obliged to timely supplement this exhibit pursuant to the ongoing discovery obligations, regardless of the timing of trial.

188–96: Okay.

Best,

Ezra

Ezra Young, Esq.

Law Office of Ezra Young

30 Devoe Street #1A

Brooklyn, NY 11211

Cell: 949-291-3185

Fax: 917-398-1849

Email: ezra@ezrayoung.com

Web: ezrayoung.com

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On **Nov 10, 2017, at 7:51 PM**, Lori Cornell <lori.cornell@oag.ok.gov> wrote:

Ezra:

I have attached Defendants' streamlined Exhibit List for your convenience. Please removed any of the withdrawn exhibits from Defendants' Trial Exhibit Notebooks that were provided to you on 11/1/2017.

In response to the questions you posed below:

- **Redlined or otherwise marked revised exhibit list.** While we did agree to exchange redlined lists, I seem to be having an issue with my word processor and our IT department is not available today or over the weekend. In the alternative, you may simply look at Defendants' previously provided list to see what exhibits have been removed. I am not aware of any rule requiring me to provide you with a redlined copy of Defendants' streamlined exhibits. If you know of one, please advise.
- **Exhibit 20:** Defendants' removed this exhibit
- **Exhibit 203:** I inadvertently omitted this Exhibit when providing you our disc

Exhibit 203 inadvertently omitted the Exhibit when providing you our discs and notebooks. I apologize for the inconvenience. However, the file is too large to email. In this regard, I have attached the certificate of authenticity to supplement Ex. 203. As you are aware, and have now admitted, Defendants provided you with Ex. 203 (Bates CC1-CC1083) in August. Simply add the certificate to those documents provided to you. Further, please advise if you would like an electronic copy of properly marked Exhibit 203 or a hard copy. I will provide you with your preference on Monday.

- **Exhibit 93:** I inadvertently typed "WITHDRAWN" on this exhibit. We actually have exhibit 93 and I have made that correction.
- **Exhibit 133:** We simply did not obtain certificates of authentication or no records until we were gearing up for trial. Plaintiff was aware of all schools Defendants' subpoenaed records from as Defendants' filed a notice regarding the same. See [Doc. 48]. I have attached a supplemental exhibit 133, please use the attached #133. (I am unable to attach the certificate to this email, I will email it to you in a second email.)
- **Exhibits 188-196:** Defendants have withdrawn these exhibits.

Lori Cornell

Office of the Attorney General
Paralegal
313 N.E. 21st Street
Oklahoma City, Oklahoma 73105
Telephone: 405.521.3921
Direct: 405.522.2906
Facsimile: 405.521.4518
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Save a tree. Don't print this e-mail unless it's really necessary.

From: Ezra Young [<mailto:ezra@ezrayoung.com>]

Sent: Friday, November 03, 2017 9:08 AM

To: Lori Cornell <lori.cornell@oag.ok.gov>

Cc: Dixie Coffey <dixie.coffey@oag.ok.gov>; Jeb Joseph <jeb.joseph@oag.ok.gov>;

Tim Bunson <tim.bunson@oag.ok.gov>; Kindanne Jones

<kindanne.jones@oag.ok.gov>; Brittany Novotny <BNovotny@nationlit.com>;

megalindo@thegalindolawfirm.com

Subject: Re: Tudor - Defendants' Exhibits

Importance: High

Lori,

I hope you are well. Can you let me know if you have made any progress on the questions I posed below.

Additionally—based on Judge Cauthron’s instructions during the hearing on Wednesday—Tudor is reviewing her exhibits to see if any can be culled. I hope to have a slightly shorter list for you by early Monday. Can you let me know if Defendants anticipate the same? To make things a bit easier, I’m happy to run a USB drive with the culled exhibits and a redlined exhibit list over to your offices on Monday (wasting postage on mailing seems a bit silly since I will be in OKC). If for whatever reason you would prefer a direct file transfer, I’m happy to do that. Just let me know what you IT folks think will work best on your end.

Best,

Ezra

Ezra Young, Esq.
Law Office of Ezra Young
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On Nov 1, 2017, at 12:46 AM, Ezra Young <ezra@ezrayoung.com> wrote:

Lori,

I hope you are well.

I’m writing to follow up with you on Defendants’ exhibits. I would appreciate a response by close of business on 11/2/17.

Can you please provide me with an electronic copy—emailing the exhibits directly to me is fine—of:

- **Redlined or otherwise marked revised exhibit list.** I believe that we agreed to exchange lists that indicated what changes were made. Can you please provide me with a list that indicates which changes were made. The revised list that you gave me appears to have changes (for example, a handful of exhibits were withdrawn). However, it's unclear to me if other changes were made. I'd appreciate a redlined or otherwise marked list so that Tudor can narrow or remove any objections that are moot due to revisions from Defendants.
- **Exhibit 20:** I've checked the CDs and emails and do not see a copy of this exhibit. Can you please send me this exhibit.
- **Exhibit 203:** I've checked the CDs and emails and do not see a copy of this exhibit. Can you please send me this exhibit.

Also I have questions about the following:

- **Exhibit 93:** On your revised list it indicates Defendants withdrew this exhibit, but you provided an exhibit marked as 93 on the cd. Did Defendants intend to withdraw Exhibit 93?
- **Exhibit 133:**
 - Are Defendants intending to supplement discovery after the close of discovery? It appears these documents were not previously produced. Indeed, several are dated after the close of discovery. If you are supplementing discovery, can you please provide an explanation as to why this supplementation is being made now.
 - The last page (PDF page 27) is not readable. It appears that there is handwriting but it did not scan properly. Can you please send me a revised version of PDF page 27.
- **Exhibits 188, 189, 190, 191, 192, 193, 194, 195, and 196.**
 - The above noted exhibits are all listed on Defendants' list as both "audio and transcript" of various interviews. To my knowledge, the United States produced just audio of these interviews in discovery but did not produce transcripts. To my knowledge, Defendants did not produce transcripts of these interviews in the course of discovery. Is it Defendants' intention to supplement discovery out of time? Additionally, can you enlighten me as to why Defendants did not serve these transcripts prior to the eve of trial? Lastly, do Defendants have any certification from the transcriber(s) as to the accuracy of these transcripts?

As I noted previously, if you notice any additional issues with Tudor's exhibits, please do bring them to my attention. I hope we are close to done with these.

Lastly, I wanted to express my sincere thanks for your diligence on the

Lastly, I wanted to express my sincere thanks for your diligence on the exhibits and your continued collegiality.

Best,

Ezra

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On Oct 28, 2017, at 10:33 AM, Ezra Young
<ezra.i.young@gmail.com> wrote:

Lori,

Confirming receipt. Thanks.

Best,

Ezra

Sent from my iPhone

On **Oct 28, 2017, at 11:00 AM**, Lori Cornell <lori.cornell@oag.ok.gov> wrote:

<image001.gif>

Ezra:

I have attached a revised copy of Defendants' Exs. 133, 163, 165 and 207, as I noticed while making notebooks I had failed to include all documents (133), misnumbered (163 and 165), and forgot to redact the MSJ exhibit number (207) from. Additionally, I have attached

(207) them. Additionally, I have attached Defendants' revised (corrected) exhibit list, it was not included on the disc provided to you or Brittany.

Lori Cornell

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<image003.png>

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<Ex 207 - Excerpts frm SEOSU Rsp to EEOC Requ for Info.pdf>

<Ex 133 - Docs Rcv'd frm Schools Intervenor Applied to.pdf>

<Ex 163 - Knapp - EEOC Handwritten Notes.pdf>

<Ex 165 - EEOC Typed Questions for DMcMillan.pdf>

<!Defendants' Revised Exhibit List.pdf>

<!Defendants' Revised (11-10) Exhibit List.pdf><Ex 133 - Docs Rcv'd frm Schools Intervenor Applied to.pdf>