

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

DR. RACHEL TUDOR,)	
)	
Plaintiff,)	
)	
v.)	Case No. 5:15-CV-00324-C
)	
SOUTHEASTERN OKLAHOMA)	
STATE UNIVERSITY,)	
)	
and)	
)	
THE REGIONAL UNIVERSITY)	
SYSTEM OF OKLAHOMA,)	
)	
)	
Defendants.)	

**PLAINTIFF DR. RACHEL TUDOR'S
SUPPLEMENTAL BRIEF IN SUPPORT OF BILL OF COSTS**

To the Clerk of Court:

During the August 16, 2018 costs hearing it was requested that the undersigned provide additional information in support of Dr. Tudor's Bill of Costs (ECF No. 299) by no later than August 23, 2018. Please treat this brief as a supplement to Tudor's previous brief (ECF No. 300).

Printing Costs. As per your request, please see the table below which indicates the number of pages per item and compensation at a rate of \$.15 per page.

Description	Number of Pages	Cost
Joint Pretrial Report (ECF No. 207)	66	\$9.90
Trial Exhibits (6 sets of 249 exhibits ¹ ; each set is 7,711 pages)	46,266	\$6,939.90 ²
Tudor Motion for Reinstatement and exhibits (ECF Nos. 268, 268-1, 268-2, 268-3, 268-4)	147	\$22.05
Tudor Reply to Opposition to Reinstatement and Exhibits (ECF Nos. 271, 271-1, 271-2, 271-3, 271-4, 271-5, 271-6, 271-7)	293	\$43.95
Tudor Front Pay and Reinstatement Brief and Exhibits (ECF Nos. 279, 279-1, 279-2, 279-3, 279-4, 279-5, 279-6, 279-7, 279-8, 279-9, 279-10, 279-11, 279-12, 279-13, 279-14, 279-15, 279-16, 279-17, 279-18, 279-19)	142	\$21.30

Total: \$7,037.10

¹ As the undersigned noted at the Costs Hearing, six sets of trial exhibits were printed. Three sets were demanded by Defendants under threat that if Tudor did not comply Defendants would oppose admission of Tudor's exhibits at trial. In short, Defendants consecutively rejected full exhibit sets claiming they were deficient and demanded new exhibits without returning the old ones, necessitating Plaintiff modify by hand back-up exhibit sets twice, resulting in three full sets of exhibits consumed by Defendants. Additionally, one set of exhibits was provided to the Court. Lastly, two sets of exhibits were necessarily used by Plaintiff's counsel at trial—one set from which copies were introduced as evidence, and the remaining set used by counsel as reference and/or to publish previously admitted exhibits to the jury.

² Tudor respectfully notes that, when computed at a rate of \$.15 per page (the default courtesy rate the undersigned was instructed to use) the total amount for the trial exhibits indicated is greater than the cost Tudor sought for this item. *See* ECF No. 299-2 at 2 (indicating Tudor sought a total of \$2,784.84 for the printing of all copies of trial exhibits and one set of binders as well as an additional \$370.23 for binders for the remaining courtesy copies and \$68.12 for custom self-inking stamps to mark the exhibits as per Defendants' request, for a total of \$3,223.19). In the event that Defendants retract their objection to Tudor's trial exhibits and binders, Tudor agrees to a sum of \$3,223.19 for this item.

Hearing and trial transcripts. As per your request, I have recomputed the costs of transcripts using the Expedited rate where appropriate. Please see the table below which indicates the rate type, number of pages, and appropriate total cost per item.

Description	Rate Type ³	Number of Pages	Cost
Docket Call Hearing (ECF No. 225)	Expedited	20	\$97.00
<i>Voir Dire</i> (ECF No. 269)	Ordinary	51	\$186.15
Trial—11/13/17 (ECF No. 246)	Expedited	192	\$931.20
Trial—11/14/17 (ECF No. 263)	Expedited	183	\$887.55
Trial—11/15/17 (ECF No. 264)	Expedited	176	\$853.60
Trial—11/16/17 (ECF No. 265)	Expedited	166	\$805.10
Trial—11/17/17 (ECF No. 266)	Expedited	145	\$703.25
Trial—11/20/17 (ECF No. 267)	Expedited	13	\$63.05

Total: \$4,526.90

Dated: August 23, 2018

/s/ Ezra Young
 Ezra Young (NY Bar No. 5283114)
 Law Office of Ezra Young
 30 Devoe, 1a
 Brooklyn, NY 11211
 P: 949-291-3185
 F: 917-398-1849
 ezraiyoung@gmail.com

³ During the pertinent period, the following rates applied to original transcripts: Real Time sur-charge to Daily (\$3.05 per page); Daily (\$6.05 per page); Expedited (\$4.85 per page); Ordinary (\$3.65 per page). Tudor paid the Daily Rate for all transcripts except for the *Voir Dire* transcript, which was charged at the Ordinary Rate. Additionally, the Trial transcripts incurred a Real Time surcharge (required by the Court Reporter to ensure the Daily deadline could be met given the workload of turning around a full-trial transcript each and every evening).

CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2018, 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/ Ezra Young
Ezra Young (NY Bar No. 5283114)