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Case No. 18-6102/ 18-6165

In the United States Court of Appeals for the Tenth Circuit

DR. RACHEL TUDOR,

Plaintiff-Appellant/Cross-Appellee
v.

SOUTHEASTERN OKLAHOMA STATE UNIVERSITY AND REGIONAL UNIVERSITY SYSTEM OF OKLAHOMA, Defendants-Appellees/Cross-Appellants

On Appeal from the United States District Court for the Western District of Oklahoma, Case No. 5:15-cv-324-C, Hon. Robin Cauthron

PLAINTIFF-APPELLANT/CROSS-APPELLEEDR.RACHELTUDOR'S APPENDIX VOLUME3 OF 9

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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 REPLY TO DEFENDANTS' OPPOSITION TO REINSTATEMENT

Defendants' Brief (ECF No. 270) is rife with pained metaphors and caustic accusations, but does not bring to light evidence or licit rationales showing it is infeasible to reinstate Dr. Tudor with tenure at Southeastern Oklahoma State University ("Southeastern").

I. Reinstatement with tenure is an appropriate remedy.

Defendants argue that awarding Tudor reinstatement with tenure is "unwarranted," claiming that this Court should not and cannot award true make-whole relief because doing so would impermissibly intrude on tenure decisions (ECF No. 270 at 15–16). But university employers are not entitled

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to make discriminatory or retaliatory tenure decisions. As one commentator observes, withholding tenure so as to extend "[j]udicial deference to universities in Title VII cases threatens to subvert Title VII's policy of 'complete relief'." Susan Pacholski, *Title VII in the University: The Different Academic Freedom Makes*, 59 UNIV. CHI. L. REV. 1317, 1318 (1992). Quite tellingly, none of the authorities Defendants cite support their preposterous position that tenure cannot be part of Tudor's make-whole relief.¹

II. No evidence that reinstatement is infeasible.

Tudor's invocation of her Title VII rights cannot weigh against reinstatement. Defendants argue that Tudor should not return to Southeastern because, when she was last there, she repeatedly complained of discrimination and retaliation (ECF No. 270 at 15) and she vigorously litigated this case (id. at 14). Similarly, Defendants argue that Tudor's

¹ In Thorton v. Kaplan, the district court correctly observed that true make-whole relief may necessitate award of reinstatement with tenure where a "university has been found to have impermissibly discriminated in making a tenure decision" (937 F.Supp. 1441, 1449 (D.Colo. 1996)), but ultimately granted front pay instead because it found copious evidence of extreme hostilities rendered the preferred remedy infeasible (961 F.Supp. 1433, 1434–36 (D.Colo. 1996)). Meanwhile, Ford v. Nicks, 866 F.2d 865 (6th Cir. 1989), affirms reinstatement to both the husband and wife plaintiff professors, affirms the decision to grant the husband tenure, but sends back the wife to the district court on the finding that she had not, under the university's rules, served the term of years necessary to merit tenure. The remaining cases are inapposite. Gutzwiller v. Fenik, 860 F.2d 1317 (6th Cir. 1988) contains a brief advisory opinion, cautioning that an award of reinstatement with tenure is rare but nevertheless an available remedy. Both Seoane-Vazquez v. Ohio State Univ., 577 Fed.Appx. 418 (6th Cir. 2014) and Villanueva v. Wellesley Coll., 930 F.2d 124 (1st Cir. 1991) involve appeals of summary judgment decisions but they never touch on whether tenure is an appropriate remedy. Roebuck v. Drexel Univ., 852 F.2d 715 (3d Cir. 1988) and Jiminez v. Mary Washington Coll., 57 F.3d 329 (4th Cir. 1995) are both appeals of final merits judgments, neither of which speak to the availability of tenure as a remedy.

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complaints at and subsequent separation from Collin College in May 2016²—is evidence of infeasibility (ECF No. 270 at 15, 19). Not so. Invocation of one's Title VII rights cannot as a matter of law give rise to infeasibility. *See, e.g., Taylor v. Teletype Corp.*, 648 F.2d 1129, 1138 (8th Cir. 1981).

There is no evidence of hostilities weighing against reinstatement. In the rare situation where courts have deemed reinstatement infeasible, they cite evidence of specific deep riffs, unsalvageable work relationships, and divisions over an employee's return that threaten to tear apart the workplace. Defendants have failed to point to evidence that meets that high bar.

Defendants lean heavily on the anemic declaration of Dr. Randy Prus (ECF No. 270-15). But, at most, Prus' declaration evidences that a single, curmudgeonly Southeastern professor has unsubstantiated concerns about Tudor's return. Though Pus personally believes that "it would not be good for

² Tudor attests that her separation from Collin College was tied up with her complaints—after she complained, Dean Weasenforth recommended that her contract not be renewed for the 2016-17 school term (**Exhibit 1** \P 3(c)).

³ See, e.g., Fitzgerald v. Sirloin Stockage, Inc., 624 F.2d 945, 957 (10th Cir. 1980) (reinstatement denied where employer engaged in "psychological warfare" against employee and retaliation was guaranteed if she returned); Starrett v. Wadley, 876 F.2d 808 (10th Cir. 1989) (reinstatement denied where employee's own psychologist attested that return to workplace would be detrimental to health because of ongoing hostilities). See also Rabkin v. Or. Health Sci. Univ., 350 F.3d 967, 978 (9th Cir. 2003) (evidence showing that mass resignations from specialized liver transplant surgical team, a complete breakdown between current administrators and employee, and fact that employee found equivalent employment elsewhere justify denial of reinstatement); Robinson v. Se. Pa. Transp. Auth., 982 F.2d 892, 899 (3d Cir. 1993) (evidence of irreparable conflict between employee and current supervisors, including employee's own racist statements maligning supervisors, weigh against reinstatement).

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this university" if Tudor returned (id. ¶ 3) and claims that it would "not be good" for Southeastern's students (id. ¶ 5) and that "half" of the English Department would oppose Tudor's return (id. ¶ 6), there is no need for (id. ¶ 4) or budget to cover Tudor's return (id.), he does not point to any particulars supporting these sweeping statements.

Without specifics, it is unclear whether there is any evidence that Tudor's reinstatement is in fact infeasible as opposed to anxiety-ridden for Prus personally. Indeed, the lack of specifics is curious given other evidence. Prus has not formally discussed Tudor's return with tenure to the Department (ECF No. 264 at 483:17–20), despite previously promising to do so (Exhibit 2 ¶ 3 and accompanying Exhibit A), making it unclear how Prus forms his opinion about his colleagues' supposed opposition. Also curious, Prus and President Burrage devised a plan to welcome Tudor back on a temporary basis as recently as November 2017 (id.). Additionally, not one single professor in the English Department has corroborated Prus' representations. Moreover, though Defendants attempt to paint Prus as a

 $^{^4}$ See, e.g., Dec. Dr. Dan Althoff, ECF No. 205-17 at 8 ¶ 10 ("[I]f Tudor were to return to Southeastern this would be a non-issue for the faculty. There is no bad blood between Tudor and the Southeastern faculty."); ECF No. 264 at 450:3–6 (Dr. Mark Spencer testifying "I don't have any particular problem" with Tudor returning); id. at 429:18–20 (Dr. John Mischo testifying he would welcome Tudor back to Southeastern); **Exhibit 3** ¶ 4(Ms. Carolyn Fridley would "welcome Dr. Tudor back"); ECF No. 268-2 ¶ 4(a)–(e) (Cotter-Lynch supports Tudor's return). See also **Exhibit 2** ¶ 4(a)–(e) (Cotter-Lynch attesting that there is a need for more English professors at Southeastern and there are plans in the pipeline to hire new professors soon); id. ¶ 4(d) (budget concerns have never been invoked to deny tenure to a English professor at Southeastern).

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crusader against Tudor, neither Prus' declaration nor his past testimony or actions evidence he harbors extreme hostilities that render reinstatement infeasible.⁵

II. Spurious criticisms of Tudor do not weigh against reinstatement.

A. Tudor's work product at Southeastern has already been evaluated by the jury.

Defendants claim there is a gap between the jury instructions and the verdict so large that this Court may set aside findings of fact undergirding the verdict (ECF No. 270 at 13). No such gap exists.

Defendants contend that their actions may have been motivated by non-illicit reasons (ECF No. 270 at 2). However, the jury was presented with evidence of Defendants' purported nondiscriminatory rationales and advised of the business judgment rule (ECF No. 257 at 18–19), and nevertheless found for Tudor on her two discrimination claims and her retaliation claim. To the extent Defendants attempt to argue they would have made the same decision—they failed to plead this affirmative defense so it is no shield to

⁵ Among other things, Prus testified at trial that he stands by the Department's decision to award Tudor tenure in the 2009-10 cycle (ECF No. 264 at 466:12–16) and that he believes that Tudor merited tenure in the 2010-11 cycle (ECF No. 264 at 486:6–14). When Tudor last worked at Southeastern, Prus mentored her to ensure she would get tenure in the 2010-11 cycle (ECF No. 264 at 482:3–8) and offered to write her recommendation letters if she needed new employment (**Exhibit 1** ¶ 5(b) and accompanying **Exhibit 1**). Lastly, Prus has never asserted that he would be unwilling to work with Tudor if she returned, or that her return would tear apart the Department let alone Southeastern. See also **Exhibit 1** ¶ 5(a)–(d) (Tudor attesting to her certainty that she can work with Prus going forward).

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Tudor's discrimination claims. Even if pled, the same decision defense does not apply to retaliation claims because they are proved by the "but for" standard.

As to Defendants' argument that Tudor was separated from Southeastern for non-illicit reasons (ECF No. 270 at 13)—Defendants' own witnesses attest that Tudor was separated from Southeastern *because* she was not awarded tenure, which was a direct result of their actions. *See, e.g.*, ECF No. 265 at 596:8–10 (Scoufos testimony).

B. Tudor's work product after separating from Southeastern does not evidence infeasibility.

Defendants have failed to present any evidence that even one professor or administrator at Southeastern sincerely believes that Tudor's post-separation activities render reinstatement infeasible. This alone is enough to deflate Defendants' arguments—pure argument (no matter how acerbic) from counsel is not evidence. *Cf. Texas Dep't of Community Affairs v. Burdine*, 450 U.S. 248, 255 n.9 (1981) ("[a]n articulation not admitted into evidence will not suffice. Thus, the [employer] cannot meet its burden merely through an answer to the complaint or by argument of counsel."). Nevertheless, Defendants criticisms' of Tudor can be set aside on the merits.

Student evaluations at Collin College. Defendants have pointed to a handful of negative student evaluations and complaints from Tudor's

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time at Collin College—but these do not prove Tudor is incapable of performing her job at Southeastern.

First, these student criticisms are not evidence Tudor is a bad teacher. Tudor swears that many of the documents Defendants point to are taken out of context. Indeed, if Tudor were such a monster in the classroom, one would expect to see sworn statements from former students, colleagues, and administrators substantiating Defendants' claims. Against these spurious accusations, Tudor swears under penalty of perjury that she never inappropriately singled out, bullied, or otherwise disparaged students in her classes (Exhibit 1 \P 2(b)). Additionally, Mrs. Jonelle Weier, a former Collin College student who successfully transferred to Harvard (Exhibit 4 \P 1, 5) and who took two courses with Tudor and whose husband also took a course with Tudor (id. \P 6), attests Tudor never did the sorts of things Defendants accuse her of (id. \P 11–12). Indeed, Weier paints a very different picture of Tudor in the classroom, swearing that, "Dr. Tudor's teaching is a great

⁶ Among other things, several of the complaints were filed in quick succession by the same student (**Exhibit 1**¶ 3(b)(i)). Indeed, Collin College ultimately found this same student's complaints were meritless and the student was later investigated for violating Collin College's ethics rules in connection with these complaints (id.). As to the issue with Tudor restricting a student's access to Blackboard—Tudor took this step to ensure that the student did not continue to violate her classroom rules and Collin College's ethics rules (id. ¶ 3(b)(iv)). As to the other student complaints, they reflect the students' spirited dissatisfaction with Tudor's use of peer review in the classroom—a process that involves students giving feedback to one another and necessarily involves students taking ownership over their writing in the classroom (id. ¶ 2(c)). Weier—who took two courses with Tudor—attests that Tudor's handling of the peer review process was always professional (**Exhibit 4**¶ 13).

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exhibit of what professors in higher education should strive to be" (id. ¶ 19).

Second, there is copious evidence that Tudor is a strong classroom teacher. Tudor's archives of student evaluations, emails, notes, and assignments (**Exhibit 1** ¶ 2(e) and accompanying **Exhibit A**) and her high ratings on RateMyProfessors.com—where out of 219 reviews, only 14 students (6.4% of respondents) rate Tudor as less than "good," the website's highest rating (Exhibit 5)—reveal similar high regard. Tudor's peers also think highly of her teaching. Classroom observations from both Southeastern and Collin College repeatedly highlight Tudor's strong teaching. See generally Exhibit 6. Many of Tudor's Southeastern and Collin College colleagues have written Tudor glowing letters of recommendation that laud her teaching. See Exhibit 7 (Southeastern letters) and Exhibit 1 ¶ 3(a). and accompanying **Exhibit C** (Collin College letters). Most tellingly, during her last two years at Southeastern, she was nominated for the Faculty Senate Recognition Award for Teaching (**Exhibit 1** ¶ 2(f) and accompanying Exhibit B).

Tudor's scholarship and service. Confusingly, Defendants claim—purely on the word of their counsel Mr. Joseph, who lacks any qualifications as an English professor or academic—that Tudor's scholarship and service since leaving Southeastern is so "poor" as to weigh against reinstatement

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(ECF No. 270 at 17–19). Once again, bald argument of counsel is not evidence. *Burdine*, 450 U.S. at 255 n.9.

As to the substance of Mr. Joseph's critiques—they have no basis whatsoever in fact. There is no evidence that, if reinstated at Southeastern, Tudor would be unwilling or unable to contribute to service and scholarship on par with other similarly situated professors. Tudor has committed herself to doing the work asked of her if she is reinstated at Southeastern (see, e.g., ECF No. 268-1 ¶ 7). Dr. Cotter-Lynch attests that Tudor is both competent to return (ECF 268-2 ¶ 4(a)—(e)) and, as to Tudor's scholarship, that it is on par with that of many senior, tenured members of the Department (Exhibit 2 ¶ 5(d) and accompanying Exhibit B). As to Prus' purported beliefs concerning Tudor's work (ECF No. 270 at 18)—Prus has never stated under oath that Tudor is incapable of performing her job at Southeastern. See also supra note 5 (collecting sworn testimony of Prus showing support for Tudor).

III. Tudor is entitled to front pay.

Defendants misunderstand the duty to mitigate. There is no rule that if new employment is secured that front pay (or reinstatement) is cut off. See McInnis v. Fairfield Communities, Inc., 458 F.3d 1129, 1146 (10th Cir. 2006) (erroneous for front pay to be denied because employee found subsequent

⁷ Defendants confuse Dr. Tudor's entitlement to back pay and front pay in their Brief (see ECF No. 270 at 20–21). In this Reply, Tudor limits her response to the issue of front pay.

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employment). In order for front pay to be denied there must be a finding that

the employee failed to take reasonable steps to mitigate damages—it is

Defendants' burden to demonstrate this failure. Spulak v. K Mart Corp., 894

F.2d 1150, 1158 (10th Cir. 1990). Moreover, the employee need not be

successful in her job search efforts in order to get front pay. *Id.* ("A claimant

need only make reasonable good faith effort, and is not held to the highest

standards of diligence.").

Defendants have pointed to one unsuccessful interview at Seminole

State University (ECF No. ECF No. 270 at 11–13) and one unsuccessful

application to Rogers State University (id. at 17), arguing these evidence of

Tudor's failure to mitigate. But see Exhibit 1 ¶ 4(b) (providing context to

Seminole State interview); id. ¶ 4(c) (speaking to Rogers State application).

But these do not evidence a failure to mitigate—they simply show that

Tudor's job search efforts were unsuccessful.

Dated:

December 29, 2017

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Exhibit 1

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Declaration of Dr. Rachel Tudor

1. I wish to provide the Court with additional information and materials in support of my request for reinstatement at Southeastern Oklahoma State University ("Southeastern").

2. My Teaching.

- a. Respect for students in the classroom. Throughout my career, I have been committed to creating and maintaining a safe, supportive, and engaging classroom environment for each and every student enrolled in my classes. I have taught a wide array of students, harkening from all sorts of backgrounds and who come to my class with political, religious, and philosophical beliefs that more often than not do not align with my own. Whatever differences I may have with my students (or similarities, for that matter), I sincerely believe that each student can and must be respected and that each student deserves to be evaluated fairly.
- b. Treatment of students. I have never singled out, bullied, or otherwise disparaged students in my classes.
- c. Peer Review. Between my separation from Southeastern and starting at Collin College I read many books and articles in an effort to further hone my teaching skills. Among other things, during this

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period I came across articles discussing deployment of "peer review" in the classroom as a tool to teach composition. In this context, "peer review" involves students exchanging drafts with one another and providing respectful but substantive feedback. Feedback is supposed to be interactive—meaning, students must know the identity of the author in order to tell the author what they think about their paper. Once I started teaching composition at Collin College, I began using peer review in my own classes. Typically, students were instructed to exchange their drafts with their colleagues and provide respectful. constructive feedback. On occasion, I would pair myself with a student if we did not have enough students to match-up with one another. On some rare occasions-where it was conducive to classroom learning—I paired myself with a student and provided feedback. Sometimes, where called for, we did peer review as a class. In these instances, I would project a student's draft for the whole class to see and I would call on students to provide feedback orally which I would sometimes mark on the projector as we went—my role here was that of a facilitator rather than a reviewer per se. On balance, I found this form of classroom "peer review" to be an effective teaching tool. It helped my students actively engage in the editing process and practice giving and receiving constructive and Case 5:15-cv-00324-C Document 271-1 Filed 12/29/17 Page 4 of 16

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respectful feedback. It was never my intent or desire to use "peer review" as a means to shame or malign any student.

- d. Rare instances of discord with students. As I imagine virtually every college professor in America can attest to, on occasion, I have had students make inappropriate comments in class or in class assignments. I sincerely believe that every student is free to maintain their own personal beliefs. However, that freedom does not entitle students to disrespect, attack, or malign their colleagues. On occasion, I have had to speak with students privately about inappropriate behavior—more often than not, these are "teachable moments" where, once the issue is drawn to the students' attention, it is quickly fixed. This is simply part of being a classroom professor.
- e. Student Feedback. As many professors do, I have saved copies of student evaluations, thank you notes and emails, as well as some assignments where my students have reflected on my teaching. Appended hereto is a collection of these documents marked as Exhibit A.
- f. Teaching Award Nominations at Southeastern. During my last two years at Southeastern I was nominated for the Faculty Senate Award in Teaching. True and accurate copies of the nomination emails are attached hereto as Exhibit B.

3. Collin College.

i.

- a. Letters of Recommendation. I believe that my colleagues at Collin College had a good sense of my teaching. Attached hereto as Exhibit C find copies of recommendation letters from two Collin College colleagues that specifically emphasize the strength of my teaching.
- b. Student complaints. I have reviewed Defendants brief filed in this case as ECF No. 270 as well as the student complaints filed as ECF No. 270-12. I wish to provide context. To protect the confidentiality of these students, I will not refer to them by name.
 - Student A (CC1067 and CC1069). This student repeatedly filed bogus complaints against me while I was at Collin College. To my knowledge, Collin College investigated these complaints and found them to not have merit. An email I have from Dean Weasenforth as well as a follow up email from another administrator investigating the student for ethics violations (both attached hereto as **Exhibit D**) corroborates my recollection. I also recall that, at some point, the Collin College administration advised me that they thought this particular student was mentally ill and that they were working with the student on these problems.

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ii.

- Student B (CC1073). This student complained about a range of issues because they were not satisfied with their mark—a D. As to the complaint regarding peer review—I do not single out students, but all students were required to participate in peer review. As to grades—I provide students with a detailed syllabus (an example of which is attached hereto as **Exhibit E**), which explains grading. As to assignments—both the syllabus and the assignment sheet (an example of which is attached hereto as **Exhibit F**) provide detailed instructions on assignments and how they will be graded. Additionally, I think it is pertinent that this student had extreme behavioral problems in my class—among other things, she frequently used profanity, on several occasions she came to class visibly intoxicated (she appeared both drunk and high), and she was repeatedly disruptive. To my knowledge, Collin College investigated Student B for ethics violations (see email attached hereto as **Exhibit G**).
- iii. Student C (CC1074). This student never presented this complaint to me in person, as is required by Collin College's complaint policy because it is an "instructional" grievance. If the complaint had been given to me, I would have spoken with

the student to about their concerns regarding assignment instructions and the importance of proper spelling in a composition class.

- iv. Student D (CC1076). This student never presented this complaint to me in person, as is required by Collin College's complaint policy because it is an "instructional" grievance. If the complaint had been given to me, I would have spoken to the student about their concerns that I was a "bully" as well as reviewed attendance policies.
- v. Student E (CC1078). This student never presented this complaint to me in person, as is required by Collin College's complaint policy because it is an "instructional" grievance. If the complaint had been given to me, I would have spoken to the student about their "general" concerns regarding grading as well as discussed constructively why they felt they had not gotten what they desired out of my class.
- vi. Student F (CC1082). This student never presented this complaint to me in person, as is required by Collin College's complaint policy because it is an "instructional" grievance. However, I do recall speaking with this student on several occasions during this course about appropriate and

inappropriate classroom behavior. In anticipation of an upcoming assignment, I shared articles with the class about language choice when discussing immigration. I recall sharing the following links: https://blog.ap.org/announcements/illegal-immigrant-no-more;

http://www.cnn.com/2012/07/05/opinion/garcia-illegal-immigrants/index.html;

https://www.nbcnews.com/news/latino/hispanic-journalist-group-media-drop-use-word-illegal-n427216;

http://www.nytimes.com/2007/10/28/opinion/28sun4.html?_r=1 &mtrref=www.cnn.com&gwh=3B118D42511337243163F8AB4 FD0FB63&gwt=pay&assetType=opinion . When the class was given an assignment to write on about refugees and immigration, Student F repeatedly used the term "illegal" to refer to undocumented immigrants in a disparaging and purposefully offensive manner. On at least two occasions, I met privately with Student F to discuss this matter. During these meetings, I advised the student that in this class we would abide by Collin College's ethics rules and as well as to be mindful of language choice going forward. After Student F continued to use inappropriate language, I temporarily

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blocked Student F from posting on the class Blackboard (a web platform that other students have access to and can view postings) for fear that Student F was intending to create a hostile environment for the other students.

My complaints and subsequent separation. In Fall 2015 I c. received an evaluation connected with my application to renew my contract from Dean Don Weasenforth that I believed was unbalanced. A true copy of that evaluation is attached hereto as **Exhibit H.** In this first evaluation, Dean Weasenforth marked me as "Meets standards for excellence" in 19 out of 22 criteria and recommended that I be given a one year renewable contract for the 2016-17 term. However, Dean Weasenforth overemphasized the students who complained about me, especially given the fact that Weasenforth himself had separately decided many of these complaints were unfounded and some of those same students had been found to be in violation of Collin College's policies in connection with their complaints about me. In an effort to fix the issue with Weasenforth's overemphasis of the student complaints, I filed a grievance. Shortly after that grievance as filed, Dean Weasenforth was directed to redo his evaluation of me. In this new evaluation, filed by Defendants as ECF No. 270-7, Dean Weasenforth

substantively changed his evaluation—marking me as "Meets standards for excellence" in 21 out of 22 criteria—improving my overall evaluation. However. Weasenforth changed his recommendation for renewal of my contract, recommending that I not be offered any new contract (effectively requesting my termination). I sincerely believed that Dean Weasenforth changed his recommendation from a one-year renewable contract to no renewal because I complained about the first evaluation. In response, I filed another grievance against him that was not successful. Once I exhausted my internal remedies at Collin College, I returned to the job market and did my best to search for new work.

4. Mitigation of Damages.

a. Hardships. I have endeavored to seek out and apply for jobs for which I am qualified since I left Southeastern. However, in spite of my best efforts, my job search has become increasingly difficult due to my precarious financial position. Among other things, I have not purchased a new personal laptop since 2010, I do not use a smartphone, and I still drive the 2000 Saturn sedan I had when I started working at Southeastern. I endeavor to keep both my computer and car in working order, but my laptop cannot run the

latest applications and I do not drive my car very often because I cannot afford critical repairs. In fact, since leaving my job at Collin College in 2016, I have stopped taking lengthy drives in my car. (Indeed, I have totally depended on my attorneys since that time to provide me transportation to and from depositions, hearings, and the trial since that time.) These limitations are embarrassing, but I have tried to do my best to seek out work.

b. Seminole State College interview. I wish to provide additional information about the Seminole State College application and interview process. In late Summer 2017 I was contacted by Holly Newell from Seminole College to set up an interview. In response, I asked whether it would be possible to get a travel reimbursement or stipend to cover my costs of going to the interview in person. (Seminole, Oklahoma is approximately 180 miles from my home in Plano, Texas.) Ms. Newell told me that no stipend was available. After that, I attempted to work with Ms. Newell to figure out a solution. At some point, Ms. Newell suggested that I use Skype for the teaching demonstration portion of the interview. I advised Ms. Newell that my laptop (low-end model PC I purchased in 2010 that runs Windows 7) likely would not work for this purpose. Despite my reservations, I tried to troubleshoot the Skype

application with Ms. Newell to no avail—we could not get my computer to run it. (I am not technologically savy, but I assume either my hardware or operating system is too old to run the latest version of Skype.) After we realized Skype would not work on my end, we came to the agreement that I would do the teaching demonstration via telephone. At no point did Ms. Newell tell me that I would be downgraded because I did the interview via telephone or that I was less likely to get the job if I did the interview via telephone. At no point did Ms. Newell offer or suggest a different mode to do a video conference that my computer could run.

at Rogers State University ("RSU") on two occasions—once in 2012 and once in 2016. I have reviewed ECF No. 270-16, which Defendants identified as my application to RSU in 2016. I do not have any specific recollection of submitting this application. To my best judgment, I assume that I must have accidentally submitted my 2012 application by accident in 2016 rather than attaching the appropriate 2016 application materials. To my recollection, I did not notice and no one from RSU pointed out this mistake to me at the time. If I had recognized my mistake or if it had been pointed out to me I would have taken all steps necessary to fix my error. It was not

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my intent or desire to provide the 2012 materials rather than the 2016 materials.

5. Dr. Randy Prus.

- a. Past interactions with Dr. Prus. I worked with Dr. Prus for seven years at Southeastern. Dr. Prus was on my hiring committee, he served as my senior faculty mentor during my first few years at Southeastern, and we routinely conferred as colleagues and participated in departmental meetings. During the whole of this period we enjoyed a collegial work relationship. Towards the end of my time at Southeastern, Dr. Prus repeatedly expressed support to me, including offering to write me letters of recommendation when I went on the job market. A true copy of an email I have from Dr. Prus is attached hereto as Exhibit I. I continue to hold deep respect for Dr. Prus as a colleague.
- b. Dr. Prus' personality. On balance, I believe Dr. Prus to be a truthful person. However, over my years of knowing him, I have noticed that he tends to be hypercritical and that he is very often abrasive. I do not hold these traits against him. However, I think it is helpful to acknowledge these proclivities because it helps give context to the ways Prus gives feedback and articulates his opinions on a wide array of issues. For instance, I can recall several occasions

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where Dr. Prus, when asked to provide feedback to colleagues—both with respect to myself and others in the Department—has fixated and amplified negatives rather than positives. This does not mean that Dr. Prus does not see positives. In practice, one need only nudge Dr. Prus a bit so that he can share his honest feedback on positives as well.

- have read the declaration that Dr. Randy Prus signed, filed in this case as ECF No. 270-15. I would like the Court to know that I still have every confidence that if I return to Southeastern that I am capable of working collegially with Dr. Prus. I do not know how or why Dr. Prus formed the opinions he swears to in his declaration, but I am prepared and able to collegially discuss any concerns he might have about my return to Southeastern. I respect that Dr. Prus has very likely felt stressed by this case. I am also sure that he has questions for me. I believe wholeheartedly that Dr. Prus and I both possess the professionalism necessary to collegially navigate my return to Southeastern and that we could work together with the rest of the English Department to ensure that my return is smooth.
- d. I have no reason to believe that Dr. Prus is extremely hostile towards me. I believe it is important for the Court to

know that I do not sense that Dr. Prus is extremely hostile towards me or that he harbors any bias against me because I am transgender. Though Dr. Prus can be abrasive, I never had interactions with him during my time at Southeastern that led me to believe that he was personally hostile or biased against me. Regrettably, I have had few opportunities to meet with my Southeastern colleagues since my separation. However, in the few instances that I have interacted with Dr. Prus during the course of this litigation, he has been professional and polite. For instance, at his deposition in 2016, we chatted a few times during breaks and exchanged pleasantries just before he left. On the day Dr. Prus testified at my trial, we spoke briefly exchanged pleasantries.

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I state under penalty of perjury that the foregoing is true and correct.

Executed on (date) 12/20/2017 in (location) Plano, Texas

Dr. Rachel Tudor

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Exhibit A



STUDENT EVALUATION OF INSTRUCTION **LECTURE**

Term:	_ Course:	Instructor:					
1	3: Please evaluate the instructor ovals completely with a No. 2 pe		RIGH			WRONG	
Expected grade in THIS course:	Semester hours completed PRIOR to this semester:	Specify the PRIMAR\ Mark ONLY one choice		enrollin	g in this	course.	
A B C D F	Less than 9 9 to 15 16 to 30 31 to 45 Over 45	☐ It was specifically r ☐ It was an elective t ☐ It was for personal ☐ It was for professio ☐ It was required for	o meet the ge enrichment. onal certification	neral re	equirem	ents for m	ny degree
1	1-16 using a scale where the icable" (5) to indicate an iten	•	• , ,	-	•	gree (4).	
			Stro	Strong	Not App.		
My instructor			Strongly Agree	Disagn.	Not App. Disagree	licable	
1. Provides inforr	mation necessary to meet the co	ourse goals			GD) (
2. Organizes this	course's content well			CD	GD C	D (3)	
3. Is well prepare	d for class meetings			co.	(2) C		
4. Uses a variety	of teaching methods (when app	oropriate)		CO.	(I)	D G	
5. Is enthusiastic	about the subject of this course)	, . ,	co	(a) (D 39	
6. Seems comfor	table with the students in this co	ourse		æ	3	D (5)	
7. Shows genuine	e interest in students' ideas			æ	GD 0	ed (ed	
8. Explains the m	naterial clearly			00	GD (00	
9. Motivates me t	to do my best work			æ	(E)	D CO	
10. Asks questions	s that challenge me to think			Œ	GD 6	5 (5)	
11. Treats student	s with respect			(3)	(E)		
12. Uses examples	s to clarify important concepts.			(CD)	(3) (1)	D (D)	
13. Makes me feel	free to ask questions in class.			(I)	(2) C	9 GD	
14. Answers quest	ions carefully and completely			ලබ	30 (3	D	
15. Listens attentiv	vely to what students have to sa	y		(ID)	w e		
16. Is available for	consultation			GĐ	(3) (C	D GO	

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Student COMMENTS on Instruction

Please provide comments on specific aspects of the instructor

What specific characteristics of the ins	structor made a positive contribution to your learning?
She spoke to us as	It we were hymans, not oust
SHUMPINTS Profesion to	udor also anowed is to perousowij
topac towrite on allow	ing u totalous our stranger and build
on weakhesses with or	urfleam!

She spoke to us as if we were humans, not just students. Professor Tudor also allowed us to pick our own topic to write on, allowing us to play our strength, and build on weaknesses with our team.

What could the instructor do differently to help you achieve the course objectives? IN SACADO OF GOING ONLY ON CHAPTER IN ALPTH, ANGULY QUESTIONS I AND DO SO IN ALPTH IF WE GO MEN THE CHAPTER IN CHAPTER THE MODELLY IN CHAPTER THE COURSE OBJECTIVES IN CHAPTER IN CHAPTER THE MODELLY IN CHAPTER THE COURSE OBJECTIVES?

Instead of going over a chapter in depth, answer questions, and do so in depth. If we go over the chapter in depth, there was no point in me reading in depth.

Please provide any additional comments:

Class was great.

"Thank you for providing valuable feedback on your instructor."



STUDENT EVALUATION OF INSTRUCTION

LECTURE

Term: Sprir	gcourse: english 130	1. Signstructor: Too			
	: Please evaluate the instructor wals completely with a No. 2 pen				
Expected grade in THIS course:	Semester hours completed PRIOR to this semester:	Specify the PRIMARY purpose for enrolling in this course. Mark ONLY one choice.			
A B C D F	Less than 9 9 to 15 16 to 30 31 to 45 Over 45	It was specifically required for my major/degree. It was an elective to meet the general requirements for my degree. It was for personal enrichment. It was for professional certification/continuing education. It was required for remediation.			
Evaluate items 1-16 using a scale where the range is from Strongly Agree (1) to Strongly Disagree (4). Fill in "Not Applicable" (5) to indicate an item does not apply to this instructional setting.					
		Se Sto 1			

	To Many		733		6		
Му	instructor	ice Agr	Oisagn ice agn	Disage	oplical rec	3/6	
1.	Provides information necessary to meet the course goals		(3)	(2)	(E)] (a)	
2.	Organizes this course's content well	-	(I)	Œ)	(<u>(f</u>)	050	
3.	Is well prepared for class meetings	*	30	GD	(D)	(3)	
4.	Uses a variety of teaching methods (when appropriate)	-	(%)	(I)	(E)	(50)	
5.	Is enthusiastic about the subject of this course	-	(70)	(E)	CD	(ED)	
6.	Seems comfortable with the students in this course	-	(ਵ੍ਹੋ)	(B)	Œ	660	
7.	Shows genuine interest in students' ideas	-	(D)	(<u>a</u>)	(H)	(5)	
8.	Explains the material clearly	=	(D)	Œ	œ	(3)	
9.	Motivates me to do my best work	-	(3)	(E)	Œ	Œ)	-
10.	Asks questions that challenge me to think	-	(漢)	Œ)	Œ	(31)	
11.	Treats students with respect	*	(Z)	(I)	Œ	CED	
12.	Uses examples to clarify important concepts	-	Œ	(B)	(9.)	(%)	
13.	Makes me feel free to ask questions in class	-	(D)	(3)	(I)	(£)	
14.	Answers questions carefully and completely	-	(Z)	3	Œ	(E)	
15.	Listens attentively to what students have to say	-	(E)	(I)	Œ	(3)	
16.	Is available for consultation	-	Cir.)	(35)	Œ	(ED)	

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Student COMMENTS on Instruction

Please provide comments on specific aspects of the instructor.

What specific characteristics of the instructor made a positive contribution to your learning?

What could the instructor do differently to help you achieve the course objectives?

Please provide any additional comments:



"Thank you for providing valuable feedback on your instructor."

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limits of knowledge introduced by the limited methods of abstaining knowledge Also about the Helbrew profilet, Teremials who came from the small miliage into Jerusalem to preach repentance of to a faithless Israel . Yet, Democracy is all about the knowledge of what is being done. In then there is amareness and peeling of -s of being altached to that particular thing, people start thing thinking about it deeply Same instance goes to Democracy and People. Until and lenters, people keep on neglecting they will not feel it and keep on giving their rights careles by to enjoy by political leaders.

Thank your being and covered.

Will mits you widol.

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Professor Tudor

English 1301-S08

5 May 2016

Throughout the few months I personally believe I have become a better writer, someone who somewhat struggles with dyslexia (Not as much as I use to) and someone who has been terrible with writing in general. I think this class has helped me in that. Thank you very much. I am thankful for being able to experience this class.

The team essays that we did, I think helped me the most. It should me problems that we have in our world at this very moment. Has really opened up my mind to new thoughts.

I apologize for this being written so poorly, I am writing this six in the morning with no sleep. I have a lot on my plate and my mind.

Another thing this class has giving me, is the want to actually write. I seem to enjoy it now. It use to be something I wouldn't do unless it was work. But I now catch myself just randomly writing short little rambles. Just for the fun of it.

Again Thank you.

You have taught me more than any other English teach I have had in the four years in highschool. Very much a preceated.

I might be the same ol' boring if I never took this class.

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Rachel Tudor

English 1302 S37

13 May 2015

Reflection Essay

This is the second semester I've taken with Ms. Tudor and it was even better than the last! I really feel like I've learned so much from this class to take with me to the real world and use. Some of the things we learned this semester was how to make our writings better and make our papers easier for our audience to read. We learned how to properly make an argument in our essays and (depending on who our audience is) present it. There were some things that I learned this semester about some current events that I had no idea were happening. The gender discrimination in videogames was a huge one and some of the immigration problems also. I knew about the gender wage inequality but I did not realize that it was as bad as it actually is.

I think this semester was a lot better than last semester in terms of not procrastinating as much. Of course I procrastinated on somethings, but doesn't everyone? I think that I turned in really good quality work every time I turned something in and I took this class very seriously and tried to learn as much as possible. So I think I did well in class and out of class!

I really think that I can use a lot of the stuff that I learned in this semester in real-life situations. Thinking back to my essay over gender wage inequality has already made me rethink the job that I'm currently at and I've already asked for a raise all because of that essay. I know that I will be able to use a lot of the things I learned here to better myself and my life.

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Professor Tudor English 2332. S02 12 May 2015

Reflection On Skills Learned During The Semester

On the first day of class, Professor Tudor came into class and introduced the course. She told the class what is expected of every student to pass the course with good grades. She worked us through the syllabus and explained its content clearly. She listed the books that would be covered throughout the semester. There were six books total to cover by the end of the semester. The number of books to cover discouraged me, I didn't want to continue the class. I did literature during my high school years but did not cover that many number of books in a semester. At the end of the class, I thought of dropping the class but on a second thought I decided not to drop the class. I decided to put in my best and never to let anything discourage from finishing the class.

On the syllabus, the professor outlined a schedule on when to read each book and what to do after reading each book. I followed the reading scheduled on the syllabus and it really helped me to keep up with reading all the books. The Professor asked every student in the class to sign up for Edublog, where we can blog and reflect on everything we have read and learned in class. Participating in Edublog was my first experience of blogging. I learned how to blog and reflect on the texts we studied. It enabled me to pour out my views and opinions on the topics we discussed in class. The in-class reflection on texts we are reading encouraged me to be prepared before coming to class. I studied the topics that are discussed in the texts to prepare myself for in-class reflections.

Before now, I didn't engage in writing long paper because I didn't like writing.

Naturally, I am lazy when it comes to writing papers, but after writing so many papers in this class, I have developed writing skills. I have seen changes in myself, my confidence level has gone up and I look forward to more writing challenges. I don't get frightened anymore if I have to write long paper. Writing is fun to me now, and it has affected the way I feel about myself positively.

I learned two interesting words, I never knew existed. One of the words is exegesis, which means: What the author intended for the audience to get out of a story or movie. The other word is

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eisegesis, which means, what the readers or audience get out of a story or movie on their own. These are very interesting words. Learning these words changed my sense of writing. It made me focus on what I want my readers to receive whenever I write a paper. I think of how my readers would perceive my writing, and that made me to focus on the main points of my idea and write it to interest my readers.

Another important skill that I learned during this semester is reading. Before now, reading was like a waste of time to me. I like learning practical skills; and getting my hands on physical objects while I learn but after reading all these books this semester, I have learned to patiently sit down and read articles, journals, books. I also learned how to analyze and reflect on the books that I have read. This experience has improved my vocabulary skills tremendously.

The way the professor make the students sit in a circle form in the class was a huge contributory factor to the skills I learned this semester. That form of sitting gave every student the opportunity to contribute to every class discussion. It enabled every student to look straight into the other students' faces and hear their contribution to every topic that was discussed in class. The professor's vivid explanations to every topic we discussed, helped me in many ways. It helped me to understand literature better. It encouraged me to read other texts that we did not cover in class.

After this class, I realized that literature was not a boring course to study because it has improved the I way speak, write, read and it also improved my confidence level. It was fun being in this class and am glad I did not drop after all.

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Dr. Tudor

ENGL 1302 S42

5 May 2015

Reflective Essay

Throughout this semester I have learned several skills and techniques that have helped me build on the reading, writing, and participating skills I learned from 1301 with you. It has been a pleasure to spend another semester with you. I loved how I was able to chime in, in class so much because I learned so much from you last semester and retained the knowledge you instilled in me. That alone should be a testament to how great of a professor you are, because I felt that I was much better prepared for the 1302 class than many of my peers who took 1301 with other professors, so I would like to thank you for that. I enjoyed the vast difference between this semesters text book and last semesters, because they present some similar material but in a completely different way so I learned so much more about topics I had already learned, which I think will help me as I continue my college career and into the business sector. The formal essay about video gaming was one of the reason I decided to take your class this semester, on top of how much I enjoy learning from you, and I think that essay taught me a lot. I learned a lot about video games that I did not now before, and as an avid gamer and someone who may be going into video game development, I now have information I can use to help me chose what games to play, and stream, and ways I can improve the industry in the future if I end up being a developer. Just like last semester I love your team setting you put us in, I believe it helps us to collaborate and I know it definitely improved my writing and I was able to make some friendships. I just

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have to give you props for the way you organize your class structure, because I think you have perfected a college rhetoric class, I learned writing skills, collaboration, and how to work with conflicting opinions in a group setting, all while not feeling as though I was in a class but and intellectual conversation with my peers, which I haven't received in any other class. No other class I have had at Collin or Oklahoma State had a group setting, which I think promotes so many skills that an individualized class does not. So please don't ever change the group setting you create in class I will never be able to express in this little essay how much I have appreciated the skills that has formed in me.

I think that I worked hard in and out of class this semester, not because I had to but because I wanted to because I wanted to be prepared for the group discussions we had in class. I think I was able to help me peers immensely with my peer reviews of their essays, I know that I was specifically able to help my group in particular to make their papers better, and up to your standards:). I think that I was able to contribute to class in many different ways, I think that I was able to help the class understand your standards and the way you like things done when they did not quite grasp what you wanted, I know that multiple people in my team thanked me for that, saying it helped them get through the class more easily. The one place I feel that I fell short this semester was with my research paper, and I regret that I procrastinated it a little bit, and then had some emergencies come up and didn't get my drafts done. My grandma was sick and I had to go up to Oklahoma to see the weekend before the paper was due, and I put it off until then thinking I would have plenty of time t get it done, but that wasn't the case. I still was able to peer review some peer research papers, and I did find that beneficial and I know I was able to help Bryce with his so I feel good about that, I just regret not being able to have my own drafts completed for reviewing.

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I believe the skills I learned this semester just built on top of the foundation we laid together last semester in 1301, and I don't think there is a written assignment I can't knock out of the park in any other class now. So I thank you for helping me for good writing technique, and really create my own style and tone as I write. I think that was the most important thing for me, I think I have a writing identity now and I have you to thank for that. I feel like my writing is unique and stands out and that will henefit me in the long run. Thank you for another great semester with you and although I won't be taking any classes with you next semester I will stop in and see how things are going next semester. Have a great summer!

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Dr. Rachel Tudor

English 1302-S03

9 May 2014

Reflection

I've been out of school for over a decade. As I pursue my degree, I knew I had to be able to efficiently and accurately write research papers using today's technology. That's why I took this class even though I didn't need the credit for it. It turned out to be one of my better decisions.

Back when I was in school the first time, the web was relatively new and you were charged by the minute. It took half a day to download a single picture and there was no such thing as researching online. Every paper meant days or even weeks of research in the library. It was normal to have to go to two or three different libraries to complete one simple research paper. I came into this class hoping to learn how to write a research paper with today's technology and I wasn't disappointed. This class taught me how to use credible online resources and how to weed through mountains of information to find the useful ones.

I found the class discussion to be very informative. It was educational to hear various opinions and thoughts on the same reading material. The class discussion was helped along by a very knowledgeable professor.

Dr. Tudor amazed me with her knowledge of the material. Of course she knew the stories we read but she also knew related stories and the background of the overall topic. I don't remember a topic of discussion where she stumbled or had to look something up. Everything we

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talked about, she knew off the top of her head. That amount of knowledge helped in learning the material and gave me confidence in knowing she knew what she was talking about.

The group structure was also a big help in learning how to write a research paper. It was very informative to get people's opinion on my paper. Of course I thought everything I wrote down was gold but having my flaws pointed out before a grade was given was a huge help.

Professor Tudor

English 2332.03

05/06/2014

Reflective Essay

I have found this semester to be intriguing and full of fun subject matter. It has truly been a pleasure to come to class and learn about Greek mythology. We discussed the Iliad, the Odyssey, and the Republic. I was able to take something uniquely different from each of the stories. My favorite has to be the Odyssey. I loved the themes expressed throughout, what I found especially enthralling was Odysseus' reliance on women. Another aspect of the class that I really enjoyed, besides the reading matter, was the variety of teaching methods. I appreciate the diversity this class provided, when most do not. The Edublogs and in-class discussions really made this class special and stand out from the rest. I will admit that I am somewhat shy when speaking in front of groups, but I took a lot from your and my classmate's opinions. It is so apparent that you really appreciate and love what you teach, and that makes all the difference.

I always strive to do my best at everything I start, and I hope that you and others were able to take something away from my work. One thing I know I need improvement on is public speaking. I have this irrational fear of speaking in front of large groups and so my in-class discussion was probably a little lacking. Although I did not speak up us much as I would have liked to, I took away a lot from the discussions, and am so glad they were such a big part of the class. As far as the written work goes, overall I am pleased with my work. I will say that I struggled on the research paper with the length requirement. I was only able to write seven

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pages. I tried to think of ways to lengthen my paper but I didn't want to just fill space with babbling. So instead of just throwing words on paper that kind of sort of make sense I decided to leave it as is.

I am so thankful that I took this class. I really took a lot from it that I will be able to apply to my everyday life. Some of the themes like courage, hospitality, honor for family, and justice really stick with me. After taking this class I have become more aware of my issue with talking in front of people and it is something I will work on. Another aspect of the class that I learned from was the group work. I was able to be the leader for group Odyssey, which isn't a role I'm too familiar with, and I really liked the responsibly and opportunity to be able to guide some of my team members. This is something I can take with me to work and other areas of my life. Just to wrap things up, I want to say thank you for an awesome semester, it really was a pleasure.

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Professor Tudor

English 2333.03

5 December 2013

Reflective Essay

During this semester there have been many things that I have learned in this class. In every time period I found new aspects of literature that have peaked my interest and I cannot wait to further pursue fluency in this field. I particularly enjoyed how the topics were tied-in to modern day issues and then took it a step further by finding ways to overcome these problems. What good does it accomplish to just complain about things without ever trying to discover a way to change it? We must always strive to improve ourselves and not let our focus stay on the past but use the lessons from our past to change our future as we see fit.

I became hooked earlier than I expected with the assistance of the Enlightenment reader. Covering the philosophers from this particular time period was definitely one of my favorite parts of this class. The bold step which they took to change their situation was truly inspirational to me. You could genuinely grasp their love for knowledge and fearless ambition in their writings. Then having the ability to get a different perspective by watching the film Agora really helped me to gather a better perspective on exactly what was going on and lead to Hypatia becoming one of my heroes. Her courage did not falter as her world began to crumble around her and she became a martyr for her beliefs in equality and passion for knowledge. I was actually so enveloped by this part of the course that I am now considering philosophy as a field in my Interdisciplinary Studies major and have registered for a philosophy class this upcoming spring.

 \mathcal{L}

Another major point that I enjoyed was Romanticism and its bewilderment by the sublime. Being able to actually feel the emotion that the authors poured out into their novels really touched my heart and left a craving for more! This was likely encouraged by my keen interest in Frankenstein. Ever since I first read this novel in high school I have felt a deep importance in the messages from Mary Shelley and seeing the impressions that she left on the world resulting in films such as Blade Runner really helped expand the understanding that I have of her work.

But my favorite work of the semester has to be Orwell's 1984 and the warning his gives of totalitarianism. The class discussions covering this text were by far the best out of any class that I have taken so far. I enjoyed how there was no apprehension in discussing certain topics that may be considered taboo and how it was unrestricted. There was nothing held back, if you shared your views then someone wouldn't try to say that you're wrong but rather share the differences between your view and theirs and the advantages or disadvantages of each. Almost seems as if we didn't get to spend enough time on this work.

As far as my personal performance in this course I would say that I expected better from myself. I was met by many challenges in this course and I really wanted to rise to the occasion but instead I felt deflated by my own performance on certain assignments, especially the edublogs. But as far as what I gained from this course I could not be any more satisfied! My passion for literature has been relight and I already have plans to read my new copy of Plato's Republic over the winter break. Thank you very much for sharing your passion with us.

Professor Tudor

English 1303-S16

4 December 2013

Reflection Essay

I wasn't particularly fond of English until this year. In high school I just slid by from essays, grades, and maintained to keep a fairly well average without learning much or anything at all. I figured thanks to my high school I would be struggling with all the assignments my professor would give me but thankfully I've have been able to learn so much in just this semester.

When the semester began I didn't know much of everything when it came to writing or ancient Greek dramas and honestly I wasn't excited that the semester was going to be consumed with it. After reading the first few plays written by Sophocles and discussing them with the rest of the class and getting my peers point of view we were able to detect literary devices I would have never caught and it started to grab my attention. I tend to have a unique way of reading when others don't manage to think the same way I do about many writings but in this class my ideas were accepted. Every class discussion we had personally helped me in ways I didn't even believe could. I would come across questions that Google wouldn't be able to give me an elaborate answer on but all my questions were always answer in class. All of the three plays by Sophocles, Euripides, and Aeschylus had so much meaning behind them if it wasn't for this class I would never had read them. I was able to feel for the characters that went through such trauma I would never be able to understand. The plays brought me back in time and I was able to understand what another civilization believed and their entertainment. I grew fond of those plays and had be taught many things without even realizing it.

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From being a daily blogger I was really excited to be able to blog for a grade. Although I was writing about essay topics, class discussions, and textbook reflections I realized by just practicing writing about the little things it was able to help my memory recover the important details I needed to know but enhanced my writing techniques as well. Making a couple blog entries every three weeks wasn't bad but taking a step back I realized how beneficial it was to me and my essays. I've actually considered of taking this blog past this semester for future classes to come because of what I was able to gain from it.

In high school my textbooks just made me look smart and I figured they didn't benefit me learning experience until I read entries from Bedford. Although it would take me awhile to actually pick up the book and start reading once I did I would learn so many literary elements, ideas, and so much crucial criteria for writing a well developed thesis. Bedford always explained his reasoning with examples and even helpful ideas to use. Bedford was always there to fall back on during ever writing block I came across and every idea without a thesis.

I have gained so much knowledge in this class in such a small period I can't even fathom. From believing I would be behind in college english I ended up better than ever. I will he able to use all the useful ideas to help me throughout my college career and I plan on only getting better from here.

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ENG 2332.5

Professor Tudor

12 Dec. 2012

Fall 2012 World Literature Reflections

Another semester had come and gone and it is already time for another reflection essay. I remember learning that I had to do a reflection essay for my English 1302 class last semester on top of the (ahem) enormous research portfolio that I had to turn in on the last day of class and I thought "Why? Why in the world do I have to write a reflection essay?" I struggled profusely with what to say and determine what would sound the most impressive until I realized I needed to shut up and smell the roses. When other than in a reflection essay am I gong to be able to write in my very own, first person voice? After coming to that realization, I enjoyed it very much, and used it as an opportunity to share what I had learned and express my gratitude to my professor for the wisdom I had gleaned, just as I will for you, professor Tudor (I wish it were academically correct to insert punctuation smilies into essays, but sadly is not).

One of the most important things I have learned this semester is that I can participate in class discussions and offer something valuable. I not only enjoyed the class discussions this semester, but I enjoyed that every class period was an opportunity to be a part of a discussion, to share what I had learned, and to see the same ideas through someone else's eyes and celebrate the differences. When I was in elementary school, I moved from Arizona to Texas halfway through my fourth grade year. The school I transferred to was on a completely different curriculum and I felt very behind. My classmates would participate in discussions in class or

answer the teacher's questions, but because I didn't know what they knew, I couldn't. My confidence was shot and I felt stupid, and ever since then, speaking in front of a group of my classmates and sharing what I know has been terrifying to me; my face has a tendency to turn beet red when I stand up to speak in front of people. Fortunately, this class has helped me to overcome that. To be able to start by sitting down and interjecting my thoughts in a less confrontational environment, and move to the research paper presentation was a tremendous help. Although I may have seemed confident in class, I was scared out of my mind.

Another thing I learned is that it's important to do your research or reading before you speak up about something you're unfamiliar with. Professor, this has been killing me since our discussion about Arabian Nights in the hallway: I was talking with you after a class that I had missed and you were explaining the class discussion that day (it was the one about Arabian Nights and the Feminist Perspectives. I had told you that I was loving the book and you cocked your head at me and said "really?" I had read a few of Shaharazad's stories in an attempt to stay caught up with the discussions but, admittedly, I had skipped the first seventy-five pages or so. I was puzzled by your reaction, so I went back and read...I was so embarrassed because I realized the reason for your reaction. After reading about the King's treatment of women (not to mention the way the other men in the stories behaved), I was appalled and found it quite disturbing. As an avid researcher (by which I mean: one who googles everything) I could have kicked myself. I felt like I needed to let you know that.

The third and final thing that I will mention (although I have learned many more than three things) is that I learned that I need to focus on my technical writing skills. I have always been one to write my feelings as I'm sure you can tell by this essay, and have always let my

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intuition guide me when it comes to grammar (i.e. what sounds right). Having grown up as a writer's daughter, reading his collegiate writing all my life, my intuition frequently guides me in the right direction. Sentence structure and grammar always puzzled me in school, so I sort of did my own thing. However I realized this semester that I need to work on matching my thoughts to my topic sentences so that my writing doesn't come across like a journal entry (much like this probably is--forgive me!). As a writing and strategic communications major, I realize that my writing style is something I'm going to need to work on for the rest of my education and likely the rest of my life as well. Thanks to your class, I will be paying closer attention to that.

As you can see, I've learned some vital lessons by taking your class, and I'm so glad I did. Although I had difficulty managing my time this semester, I really enjoyed my experience in your class. I want to thank you for the opportunity to study some incredible literature (the Odyssey was my favorite), improve my writing, and share my thoughts with a group. It gave me confidence and made me feel like I was contributing something important. I appreciate your passion for literature—it has inspired me to read more. It sounds silly, but sometimes I get so caught up in school that I forget to read a book just for the pure enjoyment of it. Now I will make sure that I do.



This report summarizes results from the Survey of Student Opinion of Instruction. The first page contains identification items, percent of student participation, and responses from the Instructor's Questionnaire.

The second and third pages summarize the distribution of student responses to each questionnaire item using a scale from five to one where five means "Strongly Agree" and one means "Strongly Disagree." In each line, the distribution of responses is a **percent** distribution based upon the total number of responses to each item. Means are based upon the appropriate **total responses** for each identified category.

SE OKLAHOMA ST.UNIV/SP 2011

INSTRUCTOR'S NAME		
TUDOR R		
COURSE TITLE		
INSTRUCTOR	SUMMARY OF UNIT	CLASSES
COURSE NUMBER	UNIT	INSTITUTIONAL CODE
	ENG	SE03686.S
REGISTERED STUDENTS	FORMS RETURNED	PERCENT PARTICIPATION
29	12	65.5%

HIS PAGE OF THE INSTRUCTOR SUMMARY CONTAINS MEANS AND			Control Million Control of the Contr	
NALYSIS OF THE FIRST 21 QUESTIONS. THE QUESTIONS COMPR				
ASED UPON THE TOTAL RESPONSES WITHIN EACH OF THE INDIC NE MILLION (SURVEY OF STUDENT OPINION OF INSTRUCTION T				
3.	INSTRUCTOR	UNIT	INSTITUTION	NATIONAL
	MEAN (SD)	MEAN (SD)	MEAN (SD)	MEAN (SC)
4FACTOR 1 INSTRUCTOR COMMITMENT TO STUDENT LEARNING			The first terms of the first ter	
QUESTIONS: 10 , 7 , 20 , 17 , 16 , 8 , 1 , 21	*** 4.86 (0,382)	4.55 (0.796)	4,50 (0.327)	4,36 (0,924)
5.				The second and the se
6FACTOR 2 INSTRUCTOR PREPARATION AND ORGANIZATION				
QUESTIONS: 9 , 11 , 3	*** 4.96 (0.185)	4.59 (0.762)	4.56 (0.802)	4.39 (0.893)
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8FACTOR 3 INSTRUCTOR/STUDENT INTERACTION				And the second s
8FACTOR 3 INSTRUCTOR/STUDENT INTERACTION QUESTIONS: 4 , 13 , 18 , 14	*** 4.73 (0.525)	1 25 (1 7/4)	A 25 (1 0/0)	4.09 (1.034)
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4FACTOR 6 COURSE ASSIGNMENTS				
QUESTIONS: 2 , 19	*** 4.76 (0.541)	4,43 (0,851)	4.25 (1.041)	4.23 (0.956)

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Rachel Tudor

From:

Wednesday, May 04, 2011 9:47 PM Sent: Rachel Tudor To: Subject: RE: a few questions Oh my goodness! Thank you so much. I will defiantly be needing references for my grad school applications next year! I have enjoyed your class very much! Thank you for showing me a completely new side of philosophy. See you tomorrow! Riley On 05/03/11, Rachel Tudor <RTudor@se.edu> wrote: Dear Of course you have an A on your paper. You are an outstanding student and thinker. It has been a pleasure and honor to have you in my class this semester. Don't worry about the Smarthinking report. If you ever need a reference—I'd be happy to write one for you. Best regards, Rachel

From:

Sent: Tuesday, May 03, 2011 1:38 PM

To: Rachel Tudor Subject: a few questions Case 5:15-cv-00324-C Document 271-2 Filed 12/29/17 Page 28 of 90 Appellate Case: 18-6102 Document: 010110085921 Date Filed: 11/19/2018 Page: 56

Rachel Tudor

From: Sent:

Thursday, October 07, 2010 3:48 PM

To:

Rachel Tudor

Subject:

Native American Lit Class

Hello, my name is and I was in your Native American literature class. I had to withdrawl from school because of transfer reasons so I wanted to let you know. And to tell you that I did enjoy the class. Thank you.

English, Humanities, & Languages Department Standard Course Evaluation Form

Semester Spring 10 Course Number 2113 Section Number 2
Please answer the following questions as honestly and concretely as possible. If you need more space please use the back of this sheet. Please Note: Faculty do not have access to student evaluations until after grades are submitted.
What did you like best about this course and why? Ditudor was menjinformative and was very kind when presenting information that may offend students. She took time to listen to the class and the class discussions truly helped with the course.
What academic aspects of this course would you change and why?
I would only recommend that we write papers after each thing we read so that we can recall and make sureall
the content is understood
Did you find the feedback the instructor gave you on your work to be helpful? Why or why not? Yes, I feel she was open to any questions that were asked and thoroughly explained the answer, even it took longer than expected.
What are the most important things you learned in this course? Honestly, I learned I was not 'alone" in my ourrent philosophy, I was introduced to many ourrent "like-minded" philosophus including Sam Harris and Chris Hedges.
If one of your friends asked you whether he or she should take this course from this instructor, what advice would you give?
Definitely! Dr. Tudor is very knowledgeable and the class is interesting, one of the best classes of my college career-
Please rate your academic effort in this course by circling a number from one to four, with four indicating the maximum effort.

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English	Humanities,	P-	anguages	Danautmant	Ctandand	Commo	Exection	Lanne
Engusu.	пишашиез,	oc .	Languages	Department	Standard	Course	LValuation	LOLI
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Semester Spring 210 Course Number 12/3/13 Section Number 13

Please answer the following questions as honestly and concretely as possible. If you need more space please use the back of this sheet. Please Note: Faculty do not have access to student evaluations until after grades are submitted.

What did you like best about this course and why?

A lot of interaction of feed back from class mates on how to better my papers

- What academic aspects of this course would you change and why? 2
- Did you find the feedback the instructor gave you on your work to be helpful? Why or why not? 3 Yes, very helpfol
- What are the most important things you learned in this course?

How to properly create a paper of the support of the Support

If one of your friends asked you whether he or she should take this course from this instructor, Yes, teacher is very apprachable what advice would you give?

Please rate your academic effort in this course by circling a number from one to four, with four indicating the maximum effort.

English, Humanities, & Languages Department Standard Course Evaluation Form

Semester S	oring co	ourse Number	21130	Section Number	1
	he following question ack of this sheet. Plenitted.				
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yes	n find the feedback the because is	HUROCH	I did w	rong was	s thousand
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what a	of your friends asked dvice would you give LUNIESS YOUR 9	you rade			

1 2 (3) 4

the maximum effort.

Please rate your academic effort in this course by circling a number from one to four, with four indicating

3	English, Humanities, & Languages Department Standard Course Evaluation Form
5	Semester Spr 2010 Course Number 2113 & Section Number 1
I	Please answer the following questions as honestly and concretely as possible. If you need more space please use the back of this sheet. Please Note: Faculty do not have access to student evaluations until after grades are submitted.
1	What did you like best about this course and why?
	I enjoyed learning about the greeks:
	Romans. I have never had to study
2	What academic aspects of this course would you change and why?
	Modling, Be Tudor is very prepared?
	the range in many factory
3	Did you find the feedback the instructor gave you on your work to be helpful? Why or why not? YES DECOUSE I have been out of School for a long time is where I was didn't learn to
	La long time à abbance il sous chiduit learnhe
	To white essays, so ther feedback to me was what are the most important things you learned in this course? Very encouragery
4	What are the most important things you learned in this course? Very encounting of
	Your to construct an essay
5	If one of your friends asked you whether he or she should take this course from this instructor,
	what advice would you give? Take it!

Please rate your academic effort in this course by circling a number from one to four, with four indicating the maximum effort.

1 2 3 4

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Rachel Tudor

From:

Sent:

Friday, February 19, 2010 3:21 PM

Subject:

Sorry I almost forgot to send this.. AGAIN: PHIL2113-1-092S

Attachments:

Demon Haunted World.docx

I really enjoy the discussions we have in your philosophy class. To be honest I did not even know what philosophy was when adding the course. Before finding out- it was just another Gen Ed.. I enjoy the fun atmosphere. I am able to be myself and learn. Best part is- I am not that shy in your class. I do not speak in other classes. I feel I have conquered something, being able to open up and speak to classroom peers! I like it a lot!:)

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Rachel Tudor

From:

Sent:

Thursday, February 10, 2011 8:11 PM

To: Subject: Rachel Tudor RE: Hello

Hello,

Thanks so much for your personal email, I'll definitely keep in touch. It makes me sad that you're leaving. You're one of my favorite professors at SE. I was wanting to take another course with you later on. I'm sure you are moving on to better things though. I wish you all the best.

Thanks again!

Take care

On 02/07/11, Rachel Tudor < RTudor@se.edu > wrote:

Hi

Good to hear from you.

I did watch Jonathan Schneer discuss his book on the origins of the conflict on BookTV: http://booktv.org/Watch/11935/The+Balfour+Declaration+The+Origins+of+the+Arablsraeli+Conflict.aspx

I haven't read the book, so I can't actually recommend it. There are some writers who regularly comment on events—Noam Chomsky, Christopher Hitchens, and Salmon Rushdie—to name a few. From a philosophical point of view, I recommend Martha Nussbaum's **Women and Human Development: The Capabilities Approach**. It is a recommended book in this semester's philosophy class—so the bookstore should have a copy. Martha discusses philosophical principles and solutions that are applicable to any conflict—particularly to conflicts such as the Israeli Palestinian.

This may be my last semester at Southeastern—if so, you may write to me at my personal email address: strtrkfan2000@yahoo.com

Best.

Rachel

From:

Sent: Friday, February 04, 2011 1:40 PM

To: Rachel Tudor Subject: Hello

Hey Professor Tudor

I've been looking for The Lathe of Heaven everywhere but can't find it. I guess I'll have to order it online... I'was wondering if you could recommend any books on the Israeli-Palestinian conflict.

I hope this new semester is going well for you and that you're staying safe and warm in this weather!

On 12/22/10, Rachel Tudor < RTudor@se.edu > wrote:

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Thank you for reminding me. I will put together a "For Further Reading List" and send it out via email to the students who might be interested.

The book is <u>The Lathe of Heaven</u> by Ursula K LeGuin (another book of hers you might enjoy is <u>The Left Hand of Darkness</u>—it is gives an interesting perspective on human culture by presenting the story from the perspective of a human on an allen world.) If you enjoy sci-fi—Kurt Vonnegut's <u>Slaughter-House Five</u>, of course, is a classic. If you tell me more about your interests, I may be able make some more appropriate suggestions.

Please feel welcome to email me anytime.

Happy Holidays!

Rachel

From:

Sent: Monday, December 20, 2010 10:17 PM

To: Rachel Tudor Subject: Hello

Hey Professor Tudor

Sorry to bother you on winter break, but I was wondering what the name of that book you were talking about in class... the book about if there were no race in the world and everyone was gray...

I remember you saying you would post the name of the book on Blackboard but I couldn't find it.

Thank you so much :) Happy Holidays

---- Original Message ----

From: Rachel Tudor < RTudor@se.edu> Date: Tuesday, December 7, 2010 7:45 am

Subject: RE: December 6

To: 1/2

Yes, thank you.

From: The Title renea Imancomapacitase Commencer

Sent: Monday, December 06, 2010 9:20 AM

To: Rachel Tudor Subject: December 6

Hey Dr. Tudor,

Did you get everything you needed from me? I handed in the Blue Book along with my research paper. I remember you telling the class that you didn't need all of our documents but the Blue Book, but I just want to make sure.

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Rachel Tudor

From: Sent:

Friday, July 31, 2009 4:24 PM

To: Subject: Rachel Tudor Re: exam

Thank you for understanding what it took for me to accept Kirsch's perspective on monotheism. The final exam was a hard paper for me to write. I am ashamed to say that I am guilty of deluding myself into thinking that I was an open, caring Christian. Kirsch and Pagels both made me realize that my perspective on things was skewed. I believe that from this point on I will not only make a better student, but a better person.

I never stopped to consider the religious background of the texts before. Viewing the Odyssey and the Aeneid as pagan works actually helped me in my "enlightenment". I say this laughingly, because I would never have considered myself as a person who needed that.

But anyway, thank you for being who you are. I am afraid that if anyone else had been my professor for Humanities, I would have been in trouble for my comments. It was your understanding and patience that allowed me to find my way through the texts.

---- Original Message -----

From: Rachel Tudor <RTudor@se.edu> Date: Thursday, July 30, 2009 9:54 am

Subject: exam

To: F

>

- > I appreciate the honesty of your answers on the Final Exam. I understand that some of the material we read presented information and perspectives that are challenging. I respect your feelings and opinions, and I hope—as you indicated on the exam—that you have learned some valuable lessons from the course. I am sure Pagels would be pleased to know that you understand her main point—that people who see things differently are not evil or possessed by evil—just different and it is important to respect those differences in a democratic society. Isn't it interesting that you found values that you admire, piety, wisdom, courage, and integrity, in a "pagan" text—The Odyssey?
- > Your term paper is fine too. Although you wanted to do a more ambitious project, your essay showed some valuable achievements—the ability to ask questions of texts and an increased awareness that there are a number of valid answers to our fundamental questions.
- > Your grade for the course is "A".
- > Rachel

Engli	ish, Humanities, & Languages Department Standard Course Evaluation Form
Seme	ster spring of Course Number 2113 Section Number
please	e answer the following questions as honestly and concretely as possible. If you need more space ause the back of this sheet. Please Note: Faculty do not have access to student evaluations until after a re submitted.
1	What did you like best about this course and why?
	the reading, I enjoy being exposed
	to new leterature
2	What academic aspects of this course would you change and why?
	None - enjoyed the discussion format
3	Did you find the feedback the instructor gave you on your work to be helpful? Why or why not?
	yes. Dr. Tudos knows her stuff.
4	What are the most important things you learned in this course?
	politics, religion, dialect we had a great mix of smart educated people
5	If one of your friends asked you whether he or she should take this course from this instructor,
	what advice would you give?
	1/2 takoit
	1
Pleas	e rate your academic effort in this course by circling a number from one to four, with four indicating

the maximum effort.

Engli	sh, Humanities, & Languages Department Standard Course Evaluation Form
Seme	ster Splin 09 Course Number 2113 Section Number 1
please	e answer the following questions as honestly and concretely as possible. If you need more space ause the back of this sheet. Please Note: Faculty do not have access to student evaluations until after are submitted.
1	What did you like best about this course and why? He leading material, P class dissources
2	What academic aspects of this course would you change and why? Hu flu paper, I be wouldn't have it
3	Did you find the feedback the instructor gave you on your work to be helpful? Why or why not? ETTEMY helpfull is love. He case.
4	What are the most important things you learned in this course?
5	introspection, appended my mind love knowledge of explorations of the minds thought of the minds thought one of your friends asked you whether he or she should take this course from this instructor, what advice would you give?

Please rate your academic effort in this course by circling a number from one to four, with four indicating the maximum effort.

1 2 3 4 1 SPACKEROL SPACKEROL

Engl	ish, Humanities, & Languages Department Standard Course Evaluation Form
Seme	ester Fall 2008 Course Number 2113 Section Number 3
pleas	se answer the following questions as honestly and concretely as possible. If you need more space se use the back of this sheet. Please Note: Faculty do not have access to student evaluations until after es are submitted.
1	What did you like best about this course and why?
	Lreeks vo. Trojans un court.
2	What academic aspects of this course would you change and why?
	not so much relading. Hand to keep up with it across with
	Other work and classes.
3	Did you find the feedback the instructor gave you on your work to be helpful? Why or why not?
	yes. Feedback on essays was great for helping under better
4	What are the most important things you learned in this course?
5	If one of your friends asked you whether he or she should take this course from this instructor, what advice would you give?
	Yes. Hood learnine experience.

Please rate your academic effort in this course by circling a number from one to four, with four indicating the maximum effort.

1 2 (3) 4

English, Humanities, & Languages Department Standard Course Evaluation Form

Semester Fall '08 Course Number 2113. Section Number 1
Please answer the following questions as honestly and concretely as possible. If you need more space please use the back of this sheet. Please Note: Faculty do not have access to student evaluations until after grades are submitted.
What did you like best about this course and why? the professor was always open to everyone's thoughts /ideas in discussion. she was always available if needed.
What academic aspects of this course would you change and why? This section was fine.
Did you find the feedback the instructor gave you on your work to be helpful? Why or why not? yes, she usually tried new best to nelp you understand what is expected and to help you better your understanding
What are the most important things you learned in this course? Throught it was most important that the whole class was abole to express their thoughts in a polite way not be offensor
If one of your friends asked you whether he or she should take this course from this instructor, what advice would you give? Jake it! it seemed everyone in the class in en goyed it and but for me; was a bit seaved to open up b/c 1 was unsure of what 1 wanted to express.
Please rate your academic effort in this course by circling a number from one to four, with four indicating the maximum effort. 1 2 (3) 4 1 conclove participated more in observation but was agraid to but am glad i wasn't put on spot
but am glad i wasn't put on spot

Semester <u>Fall 2008</u> Course Number <u>3//3</u> Section Number <u>4</u>
Please answer the following questions as honestly and concretely as possible. If you need more space please use the back of this sheet. Please Note: Faculty do not have access to student evaluations until after grades are submitted.
What did you like best about this course and why? I liked the way we aloughead the books and then Went back over them in class
2 What academic aspects of this course would you change and why? Maybe not Read as much it got kind of and af times.
Did you find the feedback the instructor gave you on your work to be helpful? Why or why not? YES. She always Seemed to fell me what to fix without really having to go into great that den
4 What are the most important things you learned in this course? How to read and COMPrehend books especially ones based in Ancientimes.
If one of your friends asked you whether he or she should take this course from this instructor, what advice would you give? Good feacher but you will have to work in that class.
Please rate your academic effort in this course by circling a number from one to four, with four indicating the maximum effort.

Tralich	Hamonities	D.	Languages	Danautmant	Standard	Course	Evaluation Form
Engusu,	numamnes,	OC	Languages	Department	Stanuaru	Course.	Evaluation Form

Semester Fall 2006 Course Number 1213 Section Number 04

Please answer the following questions as honestly and concretely as possible. If you need more space please use the back of this sheet. Please Note: Faculty do not have access to student evaluations until after grades are submitted.

What did you like best about this course and why?

There were a lot of class discussion and it helped my understand the reading much better.

What academic aspects of this course would you change and why?

I think it's great I wouldn't engage it also like how we are able to revise if we've made mistakes it's him.

Did you find the feedback the instructor gave you on your work to be helpful? Why or why not?

Yes. Now I know my flaws in my writing and I can correct it.

What are the most important things you learned in this course?

understanding different styles of writing better and I hamed how to make my papers were together better

If one of your friends asked you whether he or she should take this course from this instructor, what advice would you give?

I would tell them yes. I liked the instructor very much.

Please rate your academic effort in this course by circling a number from one to four, with four indicating the maximum effort.

1 2 3 4

sh, Humanities, & Languages Department Standard Course Evaluation Form 4563/ ster _Fall 2006_ Course Number 5103 Section Number
answer the following questions as honestly and concretely as possible. If you need more space use the back of this sheet. Please Note: Faculty do not have access to student evaluations until after are submitted.
What did you like best about this course and why? as a teacher, I loved learning something that I could actually take back to my classroom and pase.
What academic aspects of this course would you change and why?
Did you find the feedback the instructor gave you on your work to be helpful? Why or why not?
What are the most important things you learned in this course? How to Look deeper into a Story or poem. Learning more about the culture and values of Native Americans.
If one of your friends asked you whether he or she should take this course from this instructor, what advice would you give? Take '+'.

Please rate your academic effort in this course by circling a number from one to four, with four indicating the maximum effort.

English	Humanities, & Languages Department Standard Course Evaluation Form
Semeste	r _Fall 2006_ Course Number 1213 Section Number
please u	nswer the following questions as honestly and concretely as possible. If you need more space se the back of this sheet. Please Note: Faculty do not have access to student evaluations until after re submitted.
1	What did you like best about this course and why? The literature I have a lways been interested in mythology of Greek Literature:
2	What academic aspects of this course would you change and why? The amount of time spent discussing each story
3	Did you find the feedback the instructor gave you on your work to be helpful? Why or why not? Yes, she explains why or why Not and how you could make it better
4	What are the most important things you learned in this course? The importance of beging able to support a claim once yournakeit
5	If one of your friends asked you whether he or she should take this course from this instructor, what advice would you give? HIS A GOOD COURSE TO THE PROPERTY OF THE PROPERT
	ate your academic effort in this course by circling a number from one to four, with four indicating imum effort.

mon mele think about the world around is then that you encouraged anyway, something about the some remoded me of you at I are your the son your a take the son was going or that to take the have to any that I rally have to any that I rally (as well as the whole clear I have ed Bet Louty. (He had nover seen it.) I went to went my brother the Fresher. You challenged mated having me as for da improving my yhan witing skille But inght and we watched u Mr. Huder,

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Exhibit B

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Rachel Tudor

From:

Jane Elder

Sent:

Friday, February 12, 2010 2:51 PM

To:

Rachel Tudor

Subject:

Faculty Senate Award Nomination

Dear Professor Tudor:

Congratulations! We are pleased to inform you that you have been nominated for the Faculty Senate Recognition Award for excellence in **Teaching** in the School of Arts and Sciences (Arts).

You may submit a letter describing your activities in the award area for the period of January 1, 2009, to the present. The information supplied will be used in the evaluation and voting process. Please limit the length of this document on one page (250-300 words) and email it to facultynominations@se.edu no later than 5:00 p.m. on Wednesday, March 3, 2010. In the subject box please put "Faculty Senate Award" and the nomination category. For questions please contact Jane Elder at extension 2354 or jelder@se.edu.

It is indeed an honor to be nominated for this award, and we wish you the best of luck. Awards will be presented at the Faculty-Staff Awards Banquet on Monday, April 26, 2010.

Again, congratulations on your nomination.

Planning Committee Faculty Senate Southeastern Oklahoma State University 1405 N. 4th Ave. PMB 4040 Durant, OK 74701 Case 5:15-cv-00324-C Document 271-2 Filed 12/29/17 Page 48 of 90 Appellate Case: 18-6102 Document: 010110085921 Date Filed: 11/19/2018 Page: 76

Rachel Tudor

From:

Blythe Duell

Sent:

Wednesday, February 16, 2011 7:35 AM

To:

Rachel Tudor

Subject:

Faculty Senate Award Nomination

Dear Professor Tudor:

Congratulations! We are pleased to inform you that you have been nominated for the Faculty Senate Recognition Award for excellence in **Teaching** in the School of Arts and Sciences.

You may submit a letter describing your activities in the award area for the period of January 1, 2010, to the present. The information supplied will be used in the evaluation and voting process. Please limit the length of this document to one page (250-300 words) and email it to <u>facultynominations@se.edu</u> no later than 5:00 p.m. on Monday, February 28, 2011. In the subject box please put "Faculty Senate Award" and the nomination category. For questions please contact Blythe Duell at extension 2767 or bduell@se.edu.

It is indeed an honor to be nominated for this award, and we wish you the best of luck. Awards will be presented at the Faculty-Staff Awards Banquet on Monday, April 25, 2011.

Again, congratulations on your nomination.

Planning Committee
Faculty Senate
Southeastern Oklahoma State University

Blythe Duell, Ph.D.

Assistant Professor

Department of Behavioral Sciences
Southeastern Oklahoma State University

Office Hours Spring 2011: M 1:30-4:30, T 2-4, W 1:30-3, R 2-4, F 12-1:30

Morrison 015

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Rachel Tudor

From:

Blythe Duell

Sent:

Wednesday, April 27, 2011 1:40 PM

To:

Rachel Tudor

Subject:

Nomination comments

Below are your nomination comment(s) for the Faculty Senate Award: Teaching Congratulations on your nomination!

Dr. Tudor demonstrates an exceptional commitment to helping students combined with the skill and expertise to push students to their highest potential. Observation of Dr. Tudor's classroom reveals 25 students in a circle, actively discussing philosophical issues, ethical dilemmas, and the current implication of our oldest cultural traditions. This academic rigor and student engagement is partnered with clear and precise skill in teaching students the elements of academic practice, such as the effective use of technology and the nuts and bolts of how to give an effective oral presentation and write an effective essay. In short, all aspects of Dr. Tudor's teaching is exemplary, and she deserves to be recognized. – FACULTY

Blythe Duell, Ph.D.

Assistant Professor Department of Behavioral Sciences Southeastern Oklahoma State University

Office Hours Spring 2011: M 1:30-4:30, T 2-4, W 1:30-3, R 2-4, F 12-1:30

Morrison 015

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Exhibit C

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20 October 2015

Dear Search Committee Members,

It is my pleasure to write to you and recommend Dr. Rachel Tudor for a faculty appointment. I have known Dr. Tudor since she came to Collin College in 2011 as a colleague in the English department. Since then I have known her to be a dedicated, conscientious, and generous colleague.

Since she has arrived to Collin College, Dr. Tudor has successfully taught courses ranging from composition 1301, 1302, and world literature 2332 and 2333. She has taught a range of learners at the community college level from high school to adult students, and has been consistently ranked in the top categories by her students on evaluations. In fact, one of my best 1301 students last year was enrolled in Dr. Tudor's English 1302 course in the spring. When I ran to my student, I asked her how she was doing her in English 1302 class (without knowing who her professor was). The student energetically told me her assignments were challenging and interesting, and that her professor was helpful. She then pulled out papers she recently got back from Dr. Tudor to show me her work, her professor's helpful comments, and her high grades. I find moments like these entirely telling of what kinds of teaching happens around me, and I was so delighted that Professor Tudor's class pushed in the best ways possible on a talented student.

Pedagogically, Dr. Tudor works to create classroom environments that are teamoriented and foster a sense of collaboration and respect. Dr. Tudor presented at an English Department Colloquium on her use of teams in the classroom. Her presentation documented her love of the classroom and how she understands learning to be a dynamic, engaged experience. Because of the nature of community college classrooms, Dr. Tudor noted the ways in which team building in the classroom can model collaboration and critical thinking skills to all students. Dr. Tudor also challenges her own teaching. She has adopted new ways of teaching English 1302, focusing on issues such as immigration and video games. She has also pushed her students to engage in rhetorical studies by reading and applying Greek literature and discussions of rhetoric. Dr. Tudor is deeply situated in this approach,

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and her expert knowledge in this area helps her successfully teach difficult texts in ways that are approachable and meaningful to students.

Last year Dr. Tudor took over the English Department Colloquium and rebranded it the Interdisciplinary Colloquium and has since opened up the group to anyone in the college faculty. The new Colloquium has focused on books such as Christopher Phillips' Socrates Cafe and conversations based around basic core ideas in the humanities such as "goodness" and "liberty." I have participated in these and they offer a unique place in the college's conversations because they invite a broad-range of faculty and the cross-disciplinary conversations are rare opportunities to have conversations beyond our department's borders. Without a doubt, I see Dr. Tudor's vision for faculty in terms of her constant drive to ask questions, make connections, and value texts and voices from diverse backgrounds.

Dr. Tudor's professional development has also been wide ranging. Most recently, she presented at the 2015 Texas Tech Comparative Literature Symposium and this fall, I attended Dr. Tudor's presentation at the Trends in Teaching College Composition titled "Using Pericles to Teach Argument." Dr. Tudor's approach at finding contemporary connections between ancient texts and the modern world is clever and showcases how professors can connect student learning with the ancient past. Because of her work with Pericles, for examples, students can read the complex rhetorical moves he makes in his speech with the modern political rhetorics students commonly see in the media. With a bridge between past and present, ethics and morals, Dr. Tudor's approach challenges students, situates them in history, and allows students to analyze texts in their own contexts.

From my experience working with Dr. Tudor, I can tell you that she is generous and kind. Working on projects with Dr. Tudor, I have learned much from her deep knowledge in Native American Literature and ancient Greek literature. She is deeply moved by literature and words, and I am confident that her students benefit in the best ways by her passion and love for her profession.

Sincerely,

Michael A. Schueth, Ph.D.

Professor of English

Collin College

Plano, TX

mschueth@collin.edu

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November 23, 2015

To Whom It May Concern:

I am writing in support of Rachel Tudor's application for a faculty appointment. I have known Rachel since she joined the English Department at Collin College in August 2011. Rachel is a dedicated and conscientious colleague, focused on making sure her students succeed, and making a positive contribution to the college and our department.

When Rachel joined the English faculty, she immediately began to attend the department colloquium that I had started to encourage discipline-focused conversation. Rachel not only attended the colloquium regularly, she immediately began participating by offering thoughtful comments and asking insightful question. Rachel also presented "Integrating Native American Literature into the Composition Classroom" at the colloquium, which was well-received by the faculty. Her continued support of the program made her my logical choice for continuing the series when I was asked to assume another role in the department. Rachel is now chair and facilitator for the colloquium, choosing challenging texts for discussion and working to broaden the audience to include faculty members from other disciplines.

Rachel actively contributes to the scholarly community at Collin College. She has attended all of the faculty development day conferences, presented at three of the "Trends in Teaching Composition" conferences that Collin hosts each year for composition faculty of local area universities and colleges. Rachel has also worked to help position Collin's Book-in-Common program by contributing questions for the study guide, and by offering to host a panel discussion on this year's text, *The Dog Stars*. Rachel also makes herself available to help her colleagues, substituting for others when requested.

Rachel makes a substantial impact by engaging meaningfully with students. Her students regularly cite her dedication and passion for teaching in their evaluation comments, and one also nominated her for Professor of the Year during one of her first semesters here, a high honor that Collin grants yearly. When I visited Rachel's classroom last year, she actively engaged students through a mixture of teaching approaches. Rachel also cultivates her students' potential by helping them to present their research. In 2013, she created and chaired the panel "The Enduring Legacy of Greek Drama" for the Interdisciplinary Undergraduate Student Research Conference at Collin College.

Given Rachel's level of involvement and commitment to student learning, I believe she will continue to make positive contributions to your program. I am happy to give her my recommendation.

Sincerely,

Lisa Roy-Davis, PhD. Professor of English

Collin County Community College District

Spring Creek Campus

2800 E. Spring Creek Parkway, Plano, Texas 75074

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Exhibit D

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From: Carie Andrews Dippel

Sent: Thursday, April 10, 2014 10:08 AM

To: Linda Qualia; Rachel Tudor

Subject: Re:

Professor Tudor,

I have sent a letter to per Dean of Student Development protocol. She should have received it by yesterday. The letter asks her to contact my office so we can discuss her recent actions and communication with a member of the Collin Community. We will be taking two approaches to this meeting. Although her behavior is concerning (SOBI), it does not override the fact that she is possibly breaking the Student Code of Conduct (DOSD). This incident is combining both the Dean of Student Development Office and SOBI in regards to outreach for her concerning behavior and putting a stop to the hostile environment she is creating for you.

If you have any questions or concerns, please let me know.

Respectfully, Carie

Carie Dippel
Associate Dean of Student-SCC
Spring Creek Campus D 130
phone: 214-491-6222

fax: 972-881-5953

Life is a coin. You can spend it any way you wish, but you can only spend it once.
--Unknown

>>> On 4/10/2014 at 9:50 AM, Linda Qualia wrote:

Professor Tudor,

The referral was moved to the Dean of Student Development. You should have received an email from Carie Dippel, Associate dean of students. I am copying her on this.

Linda

Linda R Qualia, Ph.D. Associate Dean Counseling/Career Services
Collin College
2800 E Spring Creek Parkway
Plano, TX 75074
972-881-5779
lqualia@collin.edu
972-881-5688 fax

Because e-mail is not a secure medium, confidentiality of e-mail messages cannot be guaranteed.

>>> Rachel Tudor 4/10/2014 9:46 AM >>> Dear Linda Qualia,

Has anyone talked to some the solution of the

I just wanted to let you know what is happening.

Best regards, Rachel Tudor

From: Donald Weasenforth

Sent: Monday, April 7, 2014 3:02 PM

To:

Subject: Re: Student trying to pass a confusing class.

Ms.

I have discussed your concerns with Professor Tudor and have the following report for you:

- 1. I will address your concerns, but not the concerns of your classmates unless they contact me.
- 2. When assignments are not clear to you, you need to ask questions in class and Professor Tudor's office hours. If you have not discussed your concerns with Professor Tudor--and she believes that you have not--you need to make an appointment to meet with her.

- 3. Professor Tudor did show me that she's responded to other students' email messages. Your assertion that she responds only to you is inaccurate.
- 4. If Professor Tudor has posted phrases like "hateful troll," please print them out so that I can see them. I'll then follow up on them.
- 5. She explained her expectations regarding students' participation in the "circle," and I found them reasonable. Again, I suggest that you discuss this with Professor Tudor.
- 6. Professor Tudor pointed out that she removed all identifying information from your email message before showing it to the class. She also noted in her syllabus that she would use email messages for revision/proofreading practice. I did recommend that she request permission from students before using their messages.

Please meet with Professor Tudor. If you still have concerns, contact me afterward.

Don Weasenforth

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Exhibit E

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Fall 2016 Course Syllabus English 1302.30

Professor: Dr. Tudor

Office: B 228

Office Hours: TR: 7:00-8:30; 12:45-1:00 and by appointment

Phone: 972.881.5133 Email: rtudor@collin.edu

Email is the preferred mode of communication for inquiries. Please allow 24 hours for a response during the work week. Do not expect a response during holidays or on weekends. All emails should be sent from your Collin account and include your COMPLETE NAME, COURSE and SECTION NUMBER, and composed in standard, edited American English—these are the minimum expectations you will encounter in the professional world. Grades will **not** be communicated via email in compliance with Collin College's confidentiality policies.

Course Number: ENGL 1302

Course Title: Composition II

Course Description: Intensive study of and practice of the strategies and techniques for developing research-based expository and persuasive texts. Emphasis will be placed on effective and ethical rhetorical inquiry, including primary and secondary research methods; critical reading of verbal, visual, and multimedia texts; systematic evaluation, synthesis, and documentation of information sources; and critical thinking about evidence and conclusions. Lab required.

Course Credit Hours:

Lecture Hours: 3

Prerequisite: ENGL 1301

Student Learning Outcomes:

• State-mandated Outcomes:

- 1. Demonstrate knowledge of individual and collaborative research processes.
- 2. Develop ideas and synthesize primary and secondary sources within focused academic arguments, including one or more research-based essays.
- 3. Analyze, interpret, and evaluate a variety of texts for the ethical and logical uses of evidence
- 4. Write in a style that clearly communicates meaning, builds credibility, and inspires belief or action.

5. Apply the conventions of style manuals for specific academic disciplines (e.g. APA, CMS, MLA, etc.).

Class Information:

• **Meeting Times**: TR 8:30-9:45

• Location: BB-233

Required Texts and Materials:

- Moyers, Bill. Essays of Democracy. New York: Anchor. ISBN: 978-0307387738
- Ramage, John, John Bean & June Johnson. *Writing Arguments*. Concise 6th. Ed. New York: Pearson. ISBN: 978-0-205-17149-1
- Additional relevant online readings and printed handouts will be assigned during the semester
- Blue Book

Recommended Text

• Modern Language Association. *MLA Handbook for Writers of Research Papers*. 7th ed. New York: MLA 2009 (available in the reference section of the library)

Method of Evaluation

You will be evaluated on your successful completion of a variety of skills-building assignments consisting of formal typed essays, an essay exam, peer reviewing, in-class writing, online writing, and a research paper.

Introduction to Class

Be aware that college classes require extensive out-of-class time commitment. For instance, reputable studies have found that students need to spend two hours out of class for every lecture hour. Do the math and be prepared to spend the time required keep up with the course assignments. There are no short cuts to a legitimate education. Your failure to schedule accordingly is not an excuse to be unprepared for class. Your major assignments are described in the course syllabus, will be posted on Blackboard, and introduced in lecture; if you do not understand instructions or an assignment, please ask questions in class or schedule a conference during my office hours.

The focus of the class is using language to think more clearly, to communicate in writing more effectively, and to use grammar to achieve your personal and professional goals in a civil and responsible manner. John Trimble defined writing as "the art of creating desired effects." The exercises and assignments in the course are designed to teach you the skills necessary to write

prose that will help you achieve your goals. When writing, keep in mind philosopher Paul Rice's communication maxims: **quantity**, don't say too much; **quality**, don't say what you don't know; **relevance**, don't include extraneous information; **manner**, be orderly, unambiguous, and clear. Remember that effective communication depends on your audience's reception of your text, not on how pleased you are with what you write. Finally, do not think of this class as an obstacle in your path to your future goals, but as a goal unto itself.

No one can teach you to write well—only you can do that. How do you do that? By writing! Write frequently, write honestly, and eventually you will write well. I will give you examples of writing well, inform you of strategies to improve your writing, and introduce you to some of the tools you need (think OED, collegiate thesaurus, grammar handbook, MLA handbook, scholarly research sites, etc.)—the rest is up to you.

Privacy Policy

Enrollment in a class does not give you the right to invade the privacy of your classmates or professor. There is no legitimate reason for discussing, disclosing, or gossiping about anyone's personal information in the classroom. Intruding into the personal lives of others disrupts the learning outcomes of the course and is a violation of the Student Code of Conduct.

Grading Policy

- Formal essay: 100 points (10%)
- Annotated bibliography for research paper: 100 points (10%)
- In-class writing assignments: 100 points (10%)
- Research paper: 200 points (20%)
- Final essay exam: 200 points (20%)
- Participation and classroom demeanor: 100 points (10%)
- Reflection essay: 50 points (5%)
- Edublog writing assignments: 150 points (15%)

Bonus Points

- Team leader: 100 bonus pointsBest blog: 100 bonus points
- ❖ 900-1000=A
- **♦** 800-899=B
- **❖** 700-799=C
- **♦** 630-699=D
- **❖** 0-629=F

Grades do not measure success. Grades measure competence through evaluating your ability to complete assignments according to well-defined guidelines. Only you know if you put forth your maximum effort and reached a new plateau. If you did not put your heart and mind into an

assignment; if you did not challenge yourself to do better than you've ever done before—you have not succeeded. Be more concerned with your success than your grade. As David Foster Wallace noted, "a self is not something you just have." You have built the self you know today through your past decisions and activities; build the self you want to be tomorrow by making wise choices and cultivating virtuous habits.

Grades are based on work successfully completed and skills learned; extraneous issues, such as needing a certain GPA to maintain scholarship eligibility or continued enrollment, conflicting responsibilities, personal hardships, etc., will not be considered when assigning grades. You have my sympathy, but your grade is based on the quality of your completed assignments. It is not in your best interest to give you credentials for skills you have not learned.

I reserve the right to refuse to accept late papers. Please contact me if you have a legitimate, documented emergency that would warrant a written assignment's tardiness.

Attendance is mandatory. Texas mandates a minimum number of instructional contact hours occur during the semester for credited classes. There are no excused absences; you are allowed two weeks of absences during the semester (4 absences in a class that meets two times a week and 6 absences in a class that meets three times a week). Use your absences prudently. If you miss more than two weeks of class, you will fail the class.

Withdrawal

March 20^{th} is the last day to withdraw with a W. If you do not want to receive a letter grade in the course—you must formally withdraw from the class before March 20^{th} . Simply stopping attending class will result in a failing grade. You do not need my permission to withdraw from the class before March 20^{th} .

Online Writing and Research

Why is online writing important? "Online writing often works to give students a sense of audience, of writing as an act of communication and critical exchange that far exceeds what can be produced by the research paper. Online writing is subject not just to the scrutiny of a single evaluator but also to that of a broad group of readers engaged in thinking about the same questions" (Kathleen Fitzpatrick, "Reading and Writing Online, Rather Than on the Decline," *Profession*, MLA 2012).

(1) Edublog

Your blog should demonstrate your proficiency in using a blog to responsibly convey information to your audience (take care to demonstrate audience awareness) in concise and cogent standard edited American English. You will use your blog to share your writing process, research, and insights during the semester. To set up a free account go to: http://edublogs.org/. Click on the "set up your free blog" button. In the space indicating your blog name, type your first and last name. You may select your own username (your username must be appropriate for a college-level course) and password. Once you have created your blog, you are welcome to

customize it to your own personal style. To earn credit for this unit, you are required to post your critical reflections on your contributions to the class, the skills you learned, reflect on skills that need improvement, your peers' contributions, ideas, etc. In addition, you will occasionally be assigned a specific topic to write about on your blog. To earn credit for the corresponding post, you must post within 24 hours of the assignment. At the end of the semester, the student with the best blog will earn 100 BONUS POINTS in addition to the 150 points possible for competently completing the assignments. You may be asked to discuss your posts with the class—be prepared by keeping up with your posts.

(2) Blackboard

I will create forums on Blackboard for you to share your research and drafts with one another. You are also required to post a copy of all of your formal assignments on Blackboard whether you are present or absent from class on the due date. All documents submitted on Blackboard must be in **Word**—your document must be accessible to earn credit for completing the assignment. Word is available on the computers located in the student computer labs and in the library. In addition, the library has laptop computers you may check out.

(3) EBSCO Research Account

EBSCO provides free accounts where you may post and share your research materials and notes. Your research account should have a minimum of four folders. Prefatory to any paper conference, make sure you have created an account so we may review the information you have gathered and the notes you have prepared.

Written Assignments

(1) Formal Essay

Your formal essay must be 3-4 typed, double-spaced pages, 12-point Times New Roman font, MLA formatted with a **Works Cited** page (the Works Cited page does not count toward the minimum page-length requirement) documenting your sources (three secondary scholarly sources required) and in-text parenthetical references. The following sources are inappropriate for formal assignments: About.com, blogs, eHow, Cliff or Spark notes, wikis, etc. A copy of your essay must be submitted to Blackboard in **Word** by the assignment's due date.

(2) In-class Writing Assignments

You are required to participate in class activities that will help you to learn the skills we will cover this semester. The assignments will also gauge your proficiency and level of accomplishment. We will have in-class writing assignments to gauge your understanding the material we cover. You are responsible for keeping your graded assignments in your portfolio during the semester—any graded assignments you do not turn in at the end of the semester in your portfolio will not be counted. You, and only you, are responsible for keeping your portfolio in order. You may make up a missed in-class peer revision by conferencing in a timely manner with a Writing Center tutor.

(3) Annotated Bibliography

Your annotated bibliography is an annotated list of the books and articles you have consulted in preparation for composing your research paper. Five reputable, scholarly sources are required to earn full credit for this assignment. Each citation must be in correct MLA format and contain a 100-125 word evaluation of the source and specify how you will, or will not, use it in your paper. Reading assignments are not subject to annotation; your sources must be found on your own. A copy of your bibliography must be submitted to Blackboard in **Word**.

(4) Research Paper

The purpose of your research paper is to demonstrate your ability to critically think about a concept and render an informed exposition in a cogent and logical manner. You may write about any of the texts or authors covered in your assigned readings. Your essay must be 8-9 typed pages, double-spaced, 12-point Times New Roman font, MLA formatted with a minimum of three reputable outside sources. Make sure your sources are reputable. The following sources are inappropriate for formal assignments: About.com, blogs, eHow, Cliff or Spark notes, wikis, etc. Your research paper should be fully documented with parenthetical in-text references and a *Works Cited* page. The topic and thesis of your research paper must be approved. Your research paper may not duplicate your formal essay. While I expect you to write in standard edited American English, I will also evaluate your research paper for rhetorical (your sense of audience and purpose) and substantive (research, analysis, and originality) content. A copy of your paper must be submitted to Blackboard in **Word**.

(5) Portfolio

You are responsible for all of your graded assignments and documenting your posts. Your portfolio must include all of your graded papers and a 2-page typed, MLA formatted critical reflection essay documenting the skills you learned during the semester. Include a print copy of your online posts and a screen shot of your EBSCO folders. You must submit a portfolio before you will be allowed to take your final exam. Remember to post a copy of your reflection essay to Blackboard.

(6) Essay Exam

The purpose of the essay exam is to evaluate your understanding of the material covered and your ability to articulate your understanding in cogent and lucid prose. You will be given sample essay exam questions in advance of the exam. However, the best way to prepare for an essay exam is to attend class regularly and enthusiastically participate in class and online activities. The in-class essay exam will constitute your final exam. In order to take the essay exam, you must have turned in your portfolio and be present in the classroom at the designated final exam time.

Collaboration

All of the work you produce this semester is subject to peer review and critical analysis. All of your written work will be posted on Blackboard for peer review and discussion. In addition, your work may occasionally be displayed on the overhead projector in the classroom and discussed. The point of these exercises is not to embarrass anyone, but to help everyone become better writers and thinkers. Please accept these occasions in the spirit in which they are intended and enthusiastically cooperate in the process. Peer and instructor public review of student writing is a fundamental part of the course's pedagogy.

Teams

Teams facilitate collaboration by providing a sense of community and purpose as well as help you form working relationships with your peers. You will be assigned to one of three teams. Each team will have a team leader selected by the team member's demonstrated abilities and demeanor. If a team leader is unable or unwilling to perform his or her duties, a new team leader will be selected. Being a team leader will provide you the opportunity to learn leadership in a working environment. In the professional world, you will be expected to occasionally take a leadership role in a group—this is a valuable learning opportunity. Team leaders are responsible for providing assessment of their team's performance once every three weeks in a one-page typed evaluation. Team leaders who responsibly perform their duties will earn 100 bonus points for the semester.

Plagiarism

Plagiarism is the use of an author's words or ideas as if they were one's own without giving credit to the source, including, not limited to, failure to acknowledge a direct quotation (Student Code of Conduct 7-2.3). All incidents of suspected plagiarism will be forwarded to the office of the Dean of Student Development. In addition to any disciplinary actions the Dean may take, the plagiarized assignment will earn zero credit and no "do overs" will be allowed. Make no mistake—plagiarism is theft. You are dishonestly presenting some else's labor and creativity as your own.

See: http://www.indiana.edu/~wts/pamphlets/plagiarism.shtml

Classroom Civility

The classroom should be a safe place to discuss pertinent issues in a collegial and productive manner with respect and courtesy toward one another. I trust you to help me keep it a safe and hallowed space for learning. There is zero tolerance for using sexist, homophobic, racist, or threatening language. I know that civility is not effectively modeled for you in the media, but the classroom is not the free-for-all forum of Fox news or of the ubiquitous reality shows on television. Please watch *The News Hour* on PBS (also available online at pbs.com) for an example of how to be courteous while discussing controversial and important issues. The classroom is a forum for ideas, not bickering.

Review the *Student Code of Conduct* to familiarize yourself with your responsibilities and rights in the classroom. Prohibitive behavior includes **any activity** that *disrupts the orderly process of Collin College or interferes with the lawful rights of others* (7-2.4 B).

Creative Commons Copyright

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Check Blackboard for specific dates and assignments.

Caveat: All items on syllabus are subject to amendment. Any changes will be posted in Blackboard's *Announcements*. You are responsible to check Blackboard *Announcements* for current assignments and amendments.

Tuesday/Thursday Classes

January

18	19	20	21	22	23	24
	MLK Holiday	First day of classes	Open Edublog account	In-class writing (from Writing Arguments)	Selected readings (see Blackboard)	
		Intro to course	Read Writing		,	
			Arguments		Blog: Reflect on reading	
	_			.		
25	26	27	28	29	30	31
		Discuss selected readings Form teams and		Discuss selected readings	Read Argument as Inquiry	
		select team leaders			Blog: Reflect on reading	

February

1	2	3	4	5	6	7
	Selected readings (see Blackboard)	Discuss selected readings		Discuss selected readings	Read Core of an Argument	

	Blog: Reflect readings				Blog: Reflect on reading	
8	9 Selected readings (see Blackboard) Blog: Reflect readings	Team One: Bring 4 copies of first draft to class	Blog: Reflect on drafts	Team One: Bring 4 copies of second draft to class	Read Logical Structure of Arguments Blog: Reflect on reading	14
15	Selected readings (see Blackboard) Blog: Reflect readings	Team One: Paper due—post to Blackboard Discuss selected readings	18	Discuss selected readings	Read Using Evidence Effectively Blog: Reflect on reading	21
22	23 Selected readings (see Blackboard) Blog: Reflect readings	Discuss selected readings	Selected readings (see Blackboard) Blog: Reflect readings	Discuss selected readings	27 Read Moving Your Audience Blog: Reflect on reading	28

March

1	2	3	4	5	6	7
		Team Two: Bring 4 copies of first draft to class	Blog: Reflect on drafts	Team Two: Bring 4 copies of second draft to class	Read Responding to Objections	

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					Blog: Reflect on reading	
8	9	10	11	12	13	14
	Spring Break	Spring Break	Spring Break	Spring Break	Spring Break	
15	16	17	18	19	20	21
	Selected readings (see Blackboard) First draft due; post to Blackboard. Blog: Reflect readings	Team Two: Paper due—post copy to Blackboard Discuss selected readings	Selected readings (see Blackboard)	Discuss selected readings	Last day to withdraw Read Analyzing Arguments Rhetorically Blog: Reflect on reading	
22	Selected readings (see Blackboard) Blog: Reflect readings	Team Three: Bring 4 copies of first draft to class	Blog: Reflect on drafts	Team Three: Bring 4 copies of second draft to class	Read Analyzing Visual Arguments Blog: Reflect on reading	28
29	Selected readings (see Blackboard) Blog: Reflect readings	Team Three: Paper due—post copy to Blackboard Discuss selected readings				

April

	1	2	3	4
	Research paper theses/focused topic post on Blackboard	Discuss Annotated Bibliography	Spring Holiday	

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5	6	7	8	9	10	11
	Read Types of Claims Blog: Reflect on reading Selected readings (see Blackboard) Blog: Reflect readings	Discuss selected readings	Blog: Reflect on your research paper.	Draft of Annotated Bibliography Due—bring four copies, post on Blackboard: include outline on last page.	Read Definition and Resemblance Arguments Blog: Reflect on reading	
12	13	14	15	16	17	18
	Selected readings (see Blackboard) Blog: Reflect readings	Discuss selected readings	Selected readings (see Blackboard) Blog: Reflect readings	Annotated Bibliography Due Discuss selected readings	Read Causal Arguments Blog: Reflect on reading	
19	Selected readings (see Blackboard)	Discuss research paper	22	Self-Evaluation & Presentation of Research Project	24	25
26	Read Evaluation and Ethical Arguments Blog: Reflect on reading	28 Video	Read <i>Proposal</i> Arguments Blog: Reflect readings	Bring 4 copies of your research paper to class, post on Blackboard	Blog: Reflect on research papers.	

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		1	1	1		т _
					1	2
3	4	5	6	7	8	9
	Blog: Reflect on Research paper	Bring 4 copies of your revised research paper to class for revision, post on Blackboard.		Review for final exam Research paper due. Post copy of your research paper on Blackboard	Portfolio with Reflective Essay due	

10	11	12	13	14	15	16
	FINAL EXAMS	FINAL EXAMS	FINAL EXAMS	FINAL EXAMS	FINAL EXAMS	

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Exhibit F

Formal Paper Assignment 1302: Exploratory Essay

Write a formal exploratory essay in which you narrate in first-person, chronological order the evolution of your thinking about an issue or problem related to immigration. Rather than state a thesis, begin with a question or problem. Then describe your inquiry process as you worked your way through sources encompassing different viewpoints. Follow the guidelines for an exploratory paper shown on pages 33-34 of *Writing Arguments* and the organization pattern shown. When you cite sources, use attributive tags to distinguish between your ideas and those of the sources you summarized. Use MLA documentation for citing ideas and quotations and for creating a Works Cited page. (Adapted from *Writing Arguments*.)

Your formal essay must be 3-4 typed, double-spaced pages, 12-point Times New Roman font, MLA formatted with a **Works Cited** page (the Works Cited page does not count toward the minimum page-length requirement) documenting your sources and in-text parenthetical references. Three relevant, reputable secondary sources are required; one of your sources must be a scholarly article from *Academic Search Complete*. Essays that are less than three complete pages will be considered **incomplete** and you will receive a **failing** grade for the assignment. If your paper is not **legibly** printed, it will be considered incomplete and you will receive a failing grade. Do not bring an unstapled paper to class and ask me to staple it for you. Stapling your paper is your responsibility. A copy of your essay must be submitted to Blackboard in **Word** by the assignment's due date.

Your paper will be evaluated using the following grading rubric:

Assessment Category	Score 1-20 for each of five categories
I Ideas	
Begins with a question or problem	
Reveals intellectual and imaginative curiosity	
Understands and critically evaluates sources	
II Organization & Coherence	
Reveals a persistent, thoughtful planning stage	
Sophisticated use of transitional words, phrases, and sentences	

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Uses topic sentences to organize paragraphs and maintain theme
III Support
Uses evidence appropriately and effectively
Sufficient summaries of texts discussed
Shows awareness of recent and relevant research
IV Style
Chooses words for their precise meaning
Synthesizes a range of ideas and perspectives
The essay is tailored for its specific audience
V Mechanics
Proficient in citation and documentation appropriate to the project
The essay is clear, developed, and focused
The essay is mechanically, grammatically, and syntactically correct

Total Score between 5 -100 (+/ – 20 points for completion of 2 REVISED and MARKED drafts)

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Exhibit G

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From: Carie Andrews Dippel

Sent: Wednesday, November 11, 2015 4:28 PM

To: Rachel Tudor

Cc: Carie Andrews Dippel

Subject: Dean of Student Development Office Update/Case Received-

Professor Tudor,

We have received your SOBI report regarding . After reviewing the behavior, the SOBI committee has determined that Ms. "'s actions should be addressed by the Dean of Student Development Office. The Dean of Student Development Office has begun the disciplinary process. Should Ms. see shavior continue while I am adjudicating the case, please let me know immediately.

Respectfully, Carie Case 5:15-cv-00324-C Document 271-2 Filed 12/29/17 Page 76 of 90 Appellate Case: 18-6102 Document: 010110085921 Date Filed: 11/19/2018 Page: 104

Exhibit H

FACULTY PERFORMANCE APPRAISAL 2014-2015

Faculty Member: Tudor, Rachel

Date: 9/14/15

CWID: 100139507

[X] Annual Appraisal

Period Covered: Summer 2014-Summer 2015

Dean: Donald Weasenforth

Division: Communication and Humanities

INSTRUCTIONS

The primary purpose of the assessment process at Collin is to maintain high quality educational programs. The process focuses on the professional growth and development of each faculty member as an individual in relation to the position description, standards of excellence, divisional and institutional goals and priorities. The performance appraisal process is also used as a component in determining contractual status, including renewal, non-renewal, the awarding of multi-year contracts and termination.

The performance appraisal process is conducted in an atmosphere of open and honest communication between the employee and the supervisor. Each employee is responsible for providing the supervisor with evidence of professional accomplishments during the year that support the mission and goals of the division and the institution. Likewise, the supervisor is responsible for reviewing the employee's professional accomplishments to determine the degree to which the employee met the established objectives for the year. Conducted in an atmosphere of mutual trust and respect, the performance appraisal process provides a growth experience for all college faculty. See pages 53-55 of Faculty and Associate Faculty Handbook Fall 2014.

Criteria for excellence in the performance of faculty "Duties and Responsibilities" are listed by category on the following pages. Using the definitions and examples for these ratings, circle the appropriate rating that matches the individual's performance in each category.

M Meets standards for excellence

I Improvement needed

N Not applicable

Definitions and Examples:

MEETS: One or more of the words usually, frequently, successfully, or effectively applies. This rating is appropriate for job performance that meets and may exceed required criteria for excellence in the category.

IMPROVEMENT NEEDED: One or more of the terms occasionally, marginally, inadequately, sometimes, or progressing applies. This rating describes performance in which many of the job duties and standards are met, but where improvement in one or more areas is required to meet the criteria for excellence. An action plan must be in place, or be established to accompany this appraisal to clearly identify specific skills or areas in need of continued growth, development and/or improvement.

NOT APPLICABLE: The activity is not part of the faculty member's job or position at the college.

PLEASE NOTE:

In the comment area provided following each section, you must justify ratings that indicate a need for improvement.

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Name: Tudor, Rachel Date: 9/14/15

I. TEACHING

- 1. M I N Facilitates learning.
- 2. MIN Provides students with the fundamental body of knowledge of his/her discipline.
- 3. \underline{M} I N Teaches students to apply that knowledge.
- 4. \underline{M} I N Responds to the differing educational requirements of students.
- 5. MIN Employs current materials in classroom presentations and learning experiences.
- 6. \underline{M} I N Uses innovative teaching and learning methods.
- 7. MIN Employs effective evaluation techniques.
- 8. MIN Meets classes as scheduled.

COMMENTS:

Last year I adopted a new textbook for my 1302 classes, Writing Arguments, and this year I adopted a new textbook for my 1301 classes, Composition in the Classical Tradition. I reviewed numerous textbooks and materials to select texts that closely meet the learning outcomes of the courses. Most of the students who enroll in my classes successfully complete the classes and the portfolios of the students who successfully complete the classes demonstrate that they have met the learning objectives. Some students mistake the independent thinking I encourage for an absence of direction, but they are a minority. A few students prefer to be told precisely what to do instead of being given models of completed assignments and detailed evaluation rubrics. In the future, I will more strenuously encourage students who need more supervision to ask for it. Most of my class evaluations are overwhelmingly positive and most of the individual student comments are positive. For example, in five of the classes I taught at Collin College I had a total of 1049 positive (strongly agree/agree) responses and only 92 negative (disagree/strongly disagree)—that is over a 90% positive rating. That is an exceptional outcome—if a student has over a 90% success rate, they would earn an A. The anomaly was one class that was only 2/3rds positive (147/102). Now, I want to address the classes I was assigned at Plano West. After last year's assessment, I brought to the administration's attention that a student wrote on her evaluation that the other high school students had colluded to suhvert the evaluation process by discussing things they could write to get rid of me. The administration justly removed those evaluations from my assessment. However, I had the very same students in the Spring semester. The students continued their collusion by making spurious and ludicrous complaints to the Dean throughout the semester. I shared these with my mentor and she agreed that they ranged from not credible to patently absurd. Many of the comments on the Spring 2015 evaluations were a repetition of the same unfounded claims and bogus accusations they wrote on the Fall 2014 evaluations only more deliberately constructed and spitefully invective. The spurious nature of the negative comments is evidenced by the fact that I used the identical lesson plans at Plano West that I used on the on-campus courses and not one student at Collin College complained. In fact, the overwhelmingly positive responses from the student evaluations at Collin College is irrefutable evidence of the deceptiveness and malicious intent of the comments from the high school students. I request in the strongest terms possible that the student evaluations from Plano West not be used in my yearly assessment or in my multi-year contract assessment. It is also to be noted that I taught a composition class in the Summer 2015 at Collin College without complaint. It should also be noted that the total student enrollment in two sections of composition at Plano West is less than that of the enrollment in one composition class at Collin College—that fact gives Plano West a disproportionate and unfair impact. Why were the high school students so hostile toward me? In a word: bigotry. They were simply not mature enough to respect a trans professor. For instance, students would ask, "Sir, may I go to the bathroom," or "Sir, may I sharpen my pencil" and snicker. Adolescent intolerance is an established phenomenon demonstrated by the annual number of trans students who are bullied to death in high schools. In spite of the manifest acrimony of many of the high school students toward me, I always maintained a professional demeanor and followed the lesson plans that were successful at Collin College. While I am always open to new ideas to improve my teaching, the problem at Plano West was not pedagogy, but bigotry. Acrimony towards trans faculty has not been a significant problem on Collin College's campus, but there are some students who have created difficulties. For instance, the occasional anomalies in

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the evaluations from on-campus classes are attributable to particular students who are unreasonably antagonistic towards me.

DW: A notable number of students report that Professor Tudor's instruction is not as clear as it should be and that her classroom management is lacking. Please see details below and in student evaluations. These comments are not universal in that some students/classes find her instruction clear and ber classroom management conducive to learning, and there were more positive comments made in Spring 2015 evaluations. I encourage Professor Tudor to continue providing clear instruction and effective classroom management, but to do so in a manner that promotes the learning of <u>all</u> students.

Professor Tudor has adequately addressed concerns about providing students with the fundamental body of knowledge of her discipline and teaching them to apply that knowledge. She has done so by changing her textbook selections and the themes/topics she uses as a basis for discussions/wtiting assignments.

II. ASSISTING STUDENTS

- 1. MIN Understands current career and curriculum options, degree requirements and course transfer information within the discipline and provides rimely and tailored advice to students.
- 2. \underline{M} I N Helps students with education-based problems and/or directs students to appropriate college resources.
- 3. \underline{M} IN Assists students in accessing appropriate college and community resources for non-educational problems.
- 4. M I N Is available to and approachable by students.

COMMENTS:

I volunteered for Collin College student mentor program and I am looking forward to formally mentoring students as I have been doing informally. I encourage graduating seniors to continue their education by affirming their strengths and abilities. I frequently inform deserving students that they are welcome to ask for letters of recommendation and I provide letters of recommendation when requested. In reference to resources, I direct students to services and programs that will help them succeed at Collin College. For instance, some students were not aware that Pell Grants are not loans until I informed them. I have been here long enough now that students who formerly took my classes drop by for information—which I am pleased to provide.

III. COLLEGE SERVICE

- 1. MIN Participates in divisional and departmental meetings.
- 2. M I N Works individually and/or collaboratively with college employees to accomplish discipline, divisional and college missions, goals and objectives, by serving on college-wide task forces, search committees, faculty senate committees, advisory groups, student groups as a faculty adviser, professionally related community activities on behalf of the college, etc.

COMMENTS:

- Chair of the Interdisciplinary Colloquium (Fall 2014-present)
- Mentor: Collin College Student Mentor Program (Summer 2015-present)
- Member: English Department Curriculum Review Committee (Fall 2012-present)
- Member: English Department Sourcebook Committee (Fall 2012-present)
- Reviewer/editor of Quest (Fall 2013-present)

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- PLEASE ADD CONTRIBUTION TO BOOK-IN-COMMON (STUDY GUIDE)
- PLEASE ADD PROPOSAL FOR PANEL DISCUSSION (NATIVE AMERICAN APOCOLIPTIC VIEW)

DW: I appreciate Professor Tudor's volunteering for several initiatives, including the English Department Curriculum Review Committee and the English Department Sourcebook Committee, but in light of Professor Tudor's report to me that she was not asked to complete any tasks for either this past year, I have encouraged her to provide substantive service that compensates for that lack of activity. I also greatly appreciate the efforts she has invested in organizing the Interdisciplinary Colloquium, as this intiative provides a venue for very intellectual discussions of meaningful issues, but I have encouraged Professor Tudor to increase promotion of the Colloquium, as only two faculty members attended the September 2015 meeting. With such low attendance, the Colloquium will have a very limited benefit to the institution. I've also aplauded her for her submission to faciliate a panel discussion focussed on native American apocoliptic views, but I've noted that I would like to see this materialize, as I've encouraged her last year to provide this service.

IV. PROFESSIONAL DEVELOPMENT

- 1. \underline{M} I N Remains current and competent in the appropriate academic discipline.
- 2. <u>MIN</u> Participates in an on-going program of professional self-development.
- 3. MIN Contributes to and participates in college staff development programs, such as annual associate faculty meetings, all-staff activities and workshops, teleconferences, staff development classes, etc.

COMMENTS:

- Attended and presented: Texas Tech Comparative Literature Conference, "An Experiential Discourse on Gender and Race in Faculty Affective Relations," Spring 2015.
- Presented: Trends in Teaching College Composition Conference, "Teaching Argument as a Civic Virtue," Fall 2014.
- Attended: Blackboard Training, eLC Collin College, Summer 2015.
- Attended: Faculty Development Conference, "Scott Barry Kaufman," Fall 2014.
- Participate in mentoring program with senior faculty members Lisa Roy-Davis and consulted with Scott Cheney, Fall 2014-Summer 2015.

V. PROFESSIONAL INTERACTION

- 1. MIN Interacts professionally and courteously with students, teaching faculty and staff, including advising and assisting associate faculty when required or appropriate.
- 2. \underline{M} I N Recognizes, respects and encourages ideas of others.

COMMENTS: In the Fall of 2014 some very hurtful transphobic remarks were made in my presence by a colleague. However, with the help of Dean Weasenforth and Human Resources the colleague apologized, and I accepted the apology without acrimony. I regularly attend and actively participate in all regularly scheduled department meetings and assist other members of the college community as needed.

DW: I rarely see Professor Tudor, but when I do, I've observed her interact invariably in a professional, collegial manner with others.

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VI. POLICIES, PROCEDURES AND TIME LINES

- 1. MIN Performs duties and responsibilities in accordance with established policies and procedures.
- 2. MIN Meets time lines for assigned work.
- 3. MIN Provides timely notice for substitutes and class/schedule changes.

COMMENTS: I have responsibly performed my duties during the past year and completed additional training on policies and procedures from Human Resources in the Fall of 2014.

DW: Professor Tudor has invariably fulfilled administrative responsibilities as expected.

VII. OPTIONAL ACTIVITIES PERFORMED

VIII. ACADEMIC CHAIR ACTIVITIES

To be completed only for faculty members with Academic Chair responsibilities.

- 1. MIN Performs Academic Chair duties and responsibilities in accordance with established policies and procedures.
- 2. MIN Meets time lines for assigned Academic Chair work.
- 3. MIN Ensures associate faculty meet criteria required for accreditation.
- 4. MIN Follows hiring procedures and completes related documentation on a timely basis.
- 5. MIN Conducts classroom visits and evaluates each associate faculty member at least one time per year.
- 6. MIN Ensures teaching excellence among associate faculty.

COMMENTS:

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IX. DEAN'S ASSESSMENT OF STUDENT EVALUATIONS IN THIS EVALUATION PERIOD

Fall 2014

Nearly all ratings for one class are favorable ("Agree" or "Strongly Agree"); most ratings for a second class are favorable; and for the remaining three classes—including both dual credit classes—there is a marked number of unfavorable ("Disagree" of "Strongly Disagree") ratings. There are more unfavorable ratings than I have seen for any other faculty member. Approximately half of students' comments are positive and most frequently refer to Professor Tudor's enthusiasm and portray her as "nice." The negative comments most frequently refer to a perceived lack of clarity of Professor Tudor's instruction and her classroom management (cf. references to "awkwardness," "lack of confidence" and the view that she doesn't teach).

The first comment below is the only of its kind in that it criticizes other students' views and suggests collusion during completion of the evaluations. The other comments below reflect the general nature of students' comments as a whole.

- "The fact that the instructor is very passionate about what she is teaching gives her a positive contribution to my learning...Others will say that she is not helpful through her teaching, but in reality, the students themselves don't try to learn and only know how to slack off. Others, at this moment, are commenting on how the class is hard, but Professor Tudor is very lenient and forgiving to the class but the students take advantage of this characteristic."
- Was enthusiastic about Greek Tragedy...Be more interactive with the students and be more communicative...make students feel more comfortable."
- "She was just an average teacher. I didn't feel like she did much besides show us outside videos and have us peer review each others essay. She could interact with the class more. This class felt really detached and it was very confusing if you didn't ask others about what was going on."
- "She knows a lot about the curriculum and is passionate about what she teaches. The videos that she played in class really helped my thesis writing... She could answer questions more clearly and completely. She could be more open to talk to, and she could also let you know your grade in the class. She could try to have better social skills instead of making conversations awkward as well."
- "She is very knowledgeable about the books but she doesn't explain anything about how to do assignments...She needs to give us better directions for our assignments...Literally the worst teacher I've ever had. She explains nothing and I feel so lost in the material. The curriculum is repetitive and she gets very uncomfortable around us and whenever I ask a question she just stares at me blankly and tells me to look at the syllabus. Directions for our huge essays have about 3 sentences of explanations. English is my best subject but I have struggled so much in this class. This teacher has caused me to feel very behind in my education & I hope I have a new one next semester who knows how to educate me."
- "The teacher is clear about what her assignments are and how they are going to be graded...have more confidence or a stronger voice...She is nice, but she was not able to approach us well. She gave us more writing prompts rather than applying what to do about them. A bit more confidence..."
- "She talks about the material a lot but doesn't help or seem to know how to properly reach our class...make things clear when in class...Isn't comfortable in class and doesn't teach well, and now my Grade is suffering b/c of it."
- "She was very nice...Be more outgoing, instead of being shy and timid...The edublogs I felt, are not necessary. They just distract me, I felt like the in-class writing was more helpful."
- "Mrs. Tudor is a great person but not the best to teach english...Be confident with material, be more involve and less shy."
- "She did a very good job of teaching and making this class easy to understand...I think she did a wonderful job teaching, I have no complaints."
- "She is very organized and was a very good teacher...explain instructions better...She was a good teacher."

Spring 2015

Nearly all ratings for one class are favorable ("Agree" or "Strongly Agree"); most ratings for a second class are favorable; and for the remaining three classes—including both dual credit classes—there is a marked number of unfavorable ("Disagree" of "Strongly Disagree") ratings. There are more unfavorable ratings than I have seen for other faculty members. Approximately half of students' comments are positive and most frequently refer to Professor Tudor's enthusiasm and helpfulness. The negative comments most frequently refer to a perceived lack of clarity of Professor Tudor's instruction and her classroom management (cf. references to "timidity," "lack of interaction with students," and lack of "control").

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Name: Tudor, Rachel Date: 9/14/15

The following examples are indicative of the general nature of students' written comments:

- "My instructor was excited and ready to teach this course...Things could be better explained and questions could be clarified for better understanding...This class helped me become a better writer than before."
- "Taught me how to write a persuasive argument... Explain what she wanted exactly from the assignments instead of leaving it a guessing game. Be more personable with the students and care about us."
- "Always ready to tach the subject, and gave feedback that helps the writing improve...Feel more comfortable teaching because she is a good teacher. She could also use more teaching methods."
- "My instructor was genuinely knowledgeable about the content we explored in class. She also discussed much of what we went over with the whole class so we completely understood everything. She offers a lot of insight which was very beneficial to me..."
- "Nothing. I have never had a worse classroom environment in my 13 years as a student. She is incapable of talking with students, answering questions, or otherwise helping students in any way...Communicate with students. Make assignments, projects, and essay requirements clear. Encourage us to write on our own unique point of view rather than alter our ideas to match her bias..."
- "The characteristics of my professor that made a positive contribution to my learning were very limited. I had a lot of trouble learning in this course because the professor had so much trouble with answering questions and teaching the class. The ouly characteristic I saw as positive was her use of extensive resources to show us what we needed to learn...The instructor could have been more helpful in her actual teaching of the class, answering questions, and explaining how we can improve. We also had virtually no update on what our grades were throughout the semester or if we were meeting her standards or not. We also did the same thing every day in the class which provided no challenges for me...While I can see that Dr. Tudor is extremely knowledgeable in this field, it was difficult to learn from her because of her uncase around students. She did not communicate with us or try to help us improve our skills...I also believe that our essays were graded with a strong bias which gave unfair grades to those students that did not agree with her points of view."
- "There was really nothing that stood out this semester as a major positive contribution...This year the instructor was more harsh, not that I blame her, because a lot of the students were rude to her or took it out on her when they thought that the course was too much to handle. I wish the students wouldn't be so harsh on her but I have to admit we teenagers are bratty and not thankful enough. Many thanks to the professor for guiding us these two semesters."
- "...The relevance of her course improved this semester as opposed to last semester."
- "I knew she graded hard so it pushed me to write better essays and pay more attention in class...Does not explain things well. We always did the same activities in class and would like the change that up...Personally, I liked her. I made good grades and she seemed to respect my ideas. However I noticed that she was grading unfairly of other peoples essay. At this point, I am the only one to have made a good grade. She helpt me a lot but put others down."
- "She is very descriptive of what she expects from you. Always offers help, and even post helpful things online... She does everything already...Dr. Tudor is the best."
- "Very engager with students during disussions...very knowledgeable & insightful on subject...Take control more aggressively when class gets off topic...Fantastic Professor! Loved the course!"

Discussion (Comparisou with 2012-2013 annual appraisal and classroom observations)

While there is some improvement in ratings and comments from Fall 2014 to Spring 2015, there are more unfavorable ratings than I have seen for other professors and approximately half of the comments are critical in nature, something I rarely see as I review student evaluations. Students generally note Professor Tudor's enthusiasm for the material, her knowledge of the field, and her "niceness." However, a notable number of students report a lack of clear instruction and a lack of effective classroom management. It appears that Professor Tudor's instruction is better received by more mature students, given the fact that she received more unfavorable ratings and negative comments from all her dual credit classes than she did from most of her Collin College classes. It should be noted that two students reported collusion among students during completion of the evaluations, but it's nor clear to what extent the alleged collusion affected students' ratings and responses.

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Name: Tudor, Rachel Date: 9/14/15

If you would like to provide information about your classes, you may do so here. This is optional.		
	,	

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Name: Tudor, Rachel

Date: 9/14/15

OVERALL EVALUATION: Indicate below the overall appraisal rating which best describes a summary of the above ratings and comments.

[] MEETS STANDARDS OF EXCELLENCE
[X] IMPROVEMENT NEEDED

Comments:

RECOMMENDATION TO THE COUNCIL ON EXCELLENCE

To be completed by the Division Dean when the faculty member has become eligible for award of a multi-year contract).

JUSTIFICATIONS/COMMENTS: I recommend another one-year contract. Professor Tudor has completed an adequate amount of professional development, but she needs to provide additional substantive service. She also needs to improve her instruction/classroom management as evidenced in student evaluations. Please see details above.

do X do not recommend this faculty member for a multi-year contract.

Division Dean's Statement:

I have reviewed and discussed this performance appraisal with the faculty member.

Division Dean's Signature:

Dat

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Name: Tudor, Rachel Date: 9/14/15

My Division Dean has reviewed and discussed this performance appraisal with me. Please use the back of this form or an attachment if more room for comments is needed.		
Comments:		
Faculty Member's Signature:	Date:	

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Name: Tudor, Rachel Date: 9/14/15

IX. ANNUAL GOALS/OBJECTIVES AND EVALUATION FORM

Goal Review (Conduct annually.)

The faculty member and division dean should review a copy of the goals set during last year's Faculty Performance Appraisal and, together, evaluate the degree to which this faculty member accomplished the goals. Indicate, in the boxes shown, which goals were accomplished, which were partially accomplished, and which were not accomplished. Provide explanations for goals that were partially accomplished or not accomplished

Presented a paper at Texas Tech Comparative Literature Conference.
Paper accepted: "Teaching Argument as a Civic Virtue," Trends in Teaching College Composition.
The faculty colloquium program is now the Interdisciplinary Colloquium. An inaugural meeting was held the Spring 2015, feedback was solicited, an organizational and planning meeting was held Summer 2015, and monthly meetings are scheduled for the upcoming year.
Successfully completed the mentoring program with Lisa Roy-Davis.
I have made myself available to review any manuscripts sent to me. How many have you reviewed?
I have made myself available for any service the committee may request. What have you done on this committee?
I have made myself available for any service the committee may request. What have you done for this committee?

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Name: Tudor, Rachel Date: 9/14/15

Goal Setting (Conduct annually.)

Together, the faculty member and division dean should agree on a set of goals for the faculty member for the next fiscal year. After completion, the division dean should give the faculty member a copy of this sheet. The division dean should also retain a copy, and use it as a part of the next year's Faculty Performance Appraisal.

Goals for 2015-2016	Notes
Serve as chair of the Interdisciplinary Colloquium.	
Submit paper for publication.	
Participate in Collin College's Student Mentoring Program.	
Lead a colloquium on the topic of Native American apocalyptic literature in support of the Book In Common.	
Continue to serve as editor/reviewer for Quest.	
Continue to serve on the Curriculum Review Committee.	
Continue to serve on the Sourcebook. Committee.	
Attend an academic conference.	
Submit proposal for "Trans Literacy Project."	

Division Dean's Signature:

Faculty Member's Signature:

Date:

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Exhibit I

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Rachel Tudor

From:

Randy Prus

Sent:

Wednesday, September 08, 2010 9:18 AM

To: Subject: Rachel Tudor

RE: letter

Rachel,

Forgive the delay in responding. I will gladly write you a letter of reference for the job market. However, you should not include it in the portfolio as I am in the position of evaluating the portfolio as part of the tenure and promotion process. At some time before you begin the process, we need to meet to discuss the make-up of the committee and other things related to tenure and promotion.

Dr. Randy Prus Professor & Chair English, Humanities, & Languages Morrison Hall 326 1405 N. Fourth Ave, PMB 4050 Durant, Oklahoma 74701-0609

Fax:

Phone: (580) 745-2582 (580) 745-7406

From: Rachel Tudor

Sent: Thursday, September 02, 2010 9:15 AM

To: Randy Prus Subject: letter

Randy,

As you know, the administration denied me tenure and promotion against the expressed wishes of our own tenure and promotion committee. Although I will reapply, I certainly cannot rely on a more favorable outcome this year. Without tenure, this will be my last year at Southeastern. Consequently, it would be rash of me not to begin searching for another position soon. I would appreciate a letter of recommendation from you—if you feel comfortable providing one. If you do provide a letter—please let me know if I may include it in this year's application for tenure and promotion.

FYI: Since last year I have had several additional peer-reviewed publications as well as continuing to serve on the Faculty Senate and Planning Committee and invited to present a paper at a conference on technology and literature. I've attached a copy of my spring 2010 teaching evaluation for your consideration. It is lamentable that circumstances are as they are, but hopefully things will work out for the best for everyone. I have certainly appreciated the collegiality and professionalism of everyone in the department.

Thank you.

Rachel Tudor, PhD Dept of English, Humanities & Languages Southeastern Oklahoma State University 1405 North 4th Ave. Durant, OK 74701 580.745.2588 rtudor@se.edu

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Exhibit 2

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Declaration of Dr. Margaret Cotter-Lynch

- 1. I am a full professor of English in the English, Humanities, and Languages Department ("English Department") at Southeastern Oklahoma State University ("Southeastern").
- 2. I wish to provide additional information to the Court in support of Dr.

 Rachel Tudor's request to be reinstated as an Associate Professor in the

 English Department at Southeastern.
- 3. Prus-Burrage Emails. It is my understanding that as recently as November 3, 2017 that Dr. Randy Prus and President Sean Burrage were openly discussing the possibility of Dr. Tudor returning to Southeastern. I both had discussions with Randy Prus about this possibility and received forwarded emails from Prus between him and Burrage discussing this possibility. A true and accurate copy of the email chain I referenced above is appended hereto as Exhibit A. In the email from Randy Prus to me time stamped November 3, 2017 at 3:17pm, Dr. Prus indicates that if Tudor is to return for a term of greater than "two years" that a "vote of the department" would be required. To my knowledge, no vote of the English Department has been conducted concerning Tudor's return to Southeastern. During my discussion with Prus at this time he orally told me that he had minor reservations about Tudor's return insofar as he was concerned about Tudor

potentially filing complaints against him if she ran into issues in the Department and how those complaints might be managed. Prus did not tell me why he thought Tudor would file complaints against him or indicate that he thought it was likely that Tudor would file complaints against him.

- 4. To date, it is my understanding that the English Department still needs additional professors to cover our core classes.
 - November 2017 meeting. In early November 2017 Dr. Caryn a. Witten informed the Department that she planned to retire in May 2018. On November 20 2017, a meeting was called to discuss staffing issues within the Department and Witten's imminent departure. During this meeting it was decided that the Department required at least one additional tenured and/or tenure-track faculty member and that we would request this position soon. It was decided that the Department's needs called for professors able to teach general education humanities and World Literature courses, among other courses. Around this time, Dr. Randy Prus indicated that he would draft job announcements for two positions for the English Department over Winter Break 2017 with an eye towards posting them in January 2018. To my knowledge, the needs of the English Department have not changed since this meeting.

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b. Growth requiring additional faculty members. Southeastern is undergoing substantial growth which necessitates adding professors to the English Department. As set forth below, the current and projected course offerings in the English Department are already placing a strain on current faculty resources and are expected to require additional staffing as well as new hires, including tenured and tenure track faculty, in the near future.

i.

Honors Program. Due to an increase in the size of the Honors Program and a reconfiguration of the curriculum in 2014, the draw of the Honors Program on English Department faculty has more than doubled from 6 credit hours per year in the 2016-17 term to 14 credit hours per year in the 2017-18 term. We currently estimate further growth, drawing on English Department faculty for 32 credits per year by the 2020-21 term. Insofar as staffing goes, this is quite significant—a tenured or tenure-track faculty member at Southeastern is expected to teach 24 credit hours per year. Thus, by the 2020-21 term the Honor's Program alone will require the equivalent of more than one full-time faculty member just to staff Honors courses. In early December 2017 I met on separate occasions with President Burrage and Vice President for Academic Affairs Dr.

ii.

Bryon Clark to discuss staffing needs of the Honors Program. As Director of the Honors Program, I indicated that I needed additional faculty to teach Honors courses and that my Program's needs would exacerbate the staffing issues in the English Department because we often tapped English Department professors to teach Honors courses. Both President Burrage and Dr. Clark acknowledged the need and expressed support for additional hires so that I could adequately staff Honors courses going forward.

Bachelors of Science in Liberal and Applied Studies (BSLAS). The BSLAS program is housed within Southeastern's English Department. At present, Ms. Carolyn Fridley is the BSLAS director. At a meeting on December 8, 2017, President Burrage told me that he anticipates that the BSLAS program will grow by 20% in the coming year or two due to increased marketing and online offerings. Anticipated growth of the BSLAS program will have significant consequences for the English Department for at least two reasons. First, the English Department will need to add courses to accommodate the BSLAS program curriculum requirements that are not currently offered or staffed. Second, expansion of BSLAS will

increase the administrative workload of Ms. Fridley, which will limit the number of courses she is able to teach in the English Department.

- iii. Masters of Education in Curriculum and Instruction program. Commencing in the 2017-18, Southeastern began offering an online Masters of Education in Curriculum and Instruction degree. As part of this new degree offering, the English Department must provide graduate-level courses for the first time in over a decade. This represents an increase of 2 to 3 courses per year—a significant burden for the English Department.
- c. Shortage of professors in the English Department.
 - i. English Department's desire for more professors. At present, most Southeastern classes are taught by tenure and tenure-track professors. However, for the last few years at least half of core English Department classes like Freshman Composition are taught by adjuncts. It is my understanding that the English Department's long-term goal is to bring in more professors to cover more of these core classes.
- d. Tenure-track professors in the English Department not denied tenure because of "budget" issues. In the 2017-18 cycle, the

Department has two tenure-track professors applying for tenure, one of whom is Dr. Wilma Shires. I serve on the tenure committees for both applicants. At no point has the issue of Southeastern's budget or Department needs arisen as a reason to deny tenure to either candidate.

Relevance of developments to Tudor's return. I believe it is e. significant that the English Department is currently seeking new hires and the Honors Program, BSLAS program, and the Masters of Education in Curriculum and Instruction program all will require new hires in the near future. Among other things, Dr. Tudor is capable of teaching core English Department classes, Honors courses, and BSLAS courses—indeed, she taught many of these same classes when she worked at Southeastern. Because Dr. Tudor has a doctorate, she is also qualified to teach graduate level English courses for the Masters of Education in Curriculum and Instruction program. In my judgment, if Tudor were to return to Southeastern she could help alleviate pressure on English Department classes, Honors courses, BSLAS courses, and the graduate courses necessitated by the new Masters program either by taking over English Department classes freeing up other professors to teach courses for the other growing

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programs—or she could teach Honors, BSLAS, or graduates courses for the Masters program that need to be staffed.

5. Tudor's scholarship production.

- a. I am aware of Tudor's work since she has left Southeastern. I have also read the brief filed by Defendants in this case on December 20, 2017 wherein they claim that Tudor's scholarly production since she left Southeastern should be held against her in her attempts to seek reinstatement with tenure. I wholeheartedly disagree with the assertions made by Defendants.
- b. As a working academic and productive scholar in my field, I have some insights into what it takes to produce publishable scholarship. Among other things, to be a productive scholar one needs access to academic journals and access to a community of scholars to discuss, dissect, and contribute to the field. Though there are a handful of so-called "independent scholars" who write articles without a university affiliation, it is incredibly difficult to do so and, in many cases, these independent scholars are independently wealthy and/or have other financial support that facilitates their work outside of a traditional university setting. This is because it is expensive to subscribe to the many academic journals necessary to read the latest works in the field and it is also prohibitively expensive for most to self-fund trips to

conferences and other professional engagements. Most certainly, writing publishable academic scholarship is not something one can do without any financial or institutional support. Additionally, it is generally known in our field that a scholar who lacks an institutional or university affiliation has a "black mark" against them—regardless of the quality of their work, their scholarship will not be treated the same as that submitted by a person with an institutional or university affiliation. Lastly, while scholarship and research productivity is generally an expectation of tenured faculty at four-year universities like Southeastern, a job at a community college instead emphasizes teaching and service. Community college faculty are generally expected to spend more time on teaching, and less if any time on scholarship and research. In my opinion, it is unreasonable to expect that Dr. Tudor would have continued her scholarship and research productivity when she moved to Collin College, where research was neither expected nor supported as part of her job.

c. Based on my knowledge of what it takes to write publishable scholarship as well as Tudor's circumstances since she left Southeastern, I do not think it unusual or alarming that she has published only one article since her departure. The resources available to professors at Southeastern as well as the time we are

given to pursue scholarship makes it quite a bit easier for current Southeastern professors to produce scholarship. Indeed, if I had not had the resources Southeastern afforded me as well as the university affiliation I likely would not have been able to publish as frequently as I have or, very likely, at all.

- d. I respect the scholarly work, teaching, and service of all of my colleagues in the English Department. However, as to scholarship production, I am aware that many of my colleagues publish infrequently or not at all after they attain tenure. I am also aware that, for many reasons, my colleagues sometimes experience periods of limited production despite being actively engaged in scholarly pursuits. The English Department publicly lists scholarship produced by faculty members on Southeastern's website. A true and accurate copy of the aforementioned webpage is appended hereto as **Exhibit B**. Having reviewed Dr. Tudor's most current *cv*, a ten page document filed with this court as ECF No. 268-1 at pages 15 through 24, Tudor's body of scholarship is at least on par with that of many current tenured members of the English Department.
- e. I have no reason to believe that if Tudor is reinstated at Southeastern that she will be unable or unwilling to produce new scholarship. To date, Tudor has still published more peer review

articles than many professors in the English Department—including our most senior members. With the appropriate institutional support—like that given to me and others in the Department—I have no doubt that Tudor will continue to produce scholarship.

Reception of the Jury Verdict on Campus. To my knowledge, news of Dr. 6. Tudor's favorable jury verdict has been positive on campus. I am not aware of any students, faculty, or administrators who have openly questioned the result of the jury or spoken negatively about Dr. Tudor, her accusations, or her potential return to campus. However, I am aware that at a recent meeting of the Faculty Senate, Dr. Bryon Clark advised the faculty that the biggest issue that has arisen thus far is that some students have questioned how Southeastern will be able to afford the resolution of Dr. Tudor's litigation. At that meeting, which is memorialized in minutes of the Faculty Senate kept in the ordinary business of the Faculty Senate, Dr. Clark advised that he is certain that Southeastern has "already budgeted for our part of the maximum award" so this is a non-issue. A true and accurate copy of the Faculty Senate minutes for the November 29, 2017 meeting is attached hereto as Exhibit C.

I state under penalty of perjury that the foregoing is true and correct.

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Executed on (date) (a) (location) Clifton Park, NY.

Dr. Margaret Cotter-Lynch

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Exhibit A

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------ Original message ------From: Randy Prus < RPrus@se.edu>
Date: 11/3/17 3:17 PM (GMT-06:00)

To: Margaret Cotter-Lynch <mcotter@se.edu>

Subject: FW: Dr. Tudor

Meg,

Here is the email to President Burrage. Any term longer will require a vote of the department faculty.

Randy Prus

Professor & Chair

English, Humanities and Languages

Southeastern Oklahoma State University

425 W. University Blvd.

Durant, OK 74701

Phone: 580 745 2582

Fax: 580 745 7406

rprus@se.edu

From: Randy Prus

Sent: Friday, November 03, 2017 1:19 PM **To:** Sean Burrage < sburrage@se.edu>

Subject: Dr. Tudor

President Burrage,

You asked me to provide some input for a possible settlement with Dr. Tudor. I think we covered much of this yesterday, but let me reiterate.

The offer will be for a two-year, non-renewable, Assistant Professorship, with the stipulation she is credentialed through Quality Matters and her courses, where necessary, meet the AP criteria. Disputes involving Dr. Tudor will be mediated by the president.

I think this is the way I understand the situation.

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Randy Prus

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Exhibit B

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Faculty & Staff **Future Students Current Students** Alumni & Friends **News & Events About SE Athletics**

English, Humanities, & Languages

Faculty Scholarship

Faculty Publications

Paula Smith Allen

Monograph:

2000 Metamorphosis and the Emergence of the Feminine: A Motif of "Difference" in Women's Writing Lang, Publishers, 2000.

Articles/Book Chapters:

2008 "Summer Lightning: Olive Senior's Jamaican Redemption." Beyond the Canebrakes: We Women Writers in Canada. Emily Williams, Ed. Laurenceville, NJ: Africa World Press, 2008.

2008 "Identity and the Teaching of Diversity." Teaching Multicultural Literature to Help Children Un Ethnic Diversity: Essays and Experiences. KaaVonia Hinton Jonson, et. al., Eds. Lewistown, NY: Edw Press, 2008.

(With Dr. Wendell Aycock) "Subversions of the First Holy Communion In Contemporary Fiction." Confluencia 13 (Fall 1997):1, 204-218.

1996 "Changing the Backdrop: Portraiture in Sandra Cisneros' 'Never Marry a Mexican.'" Re Estudios Hispánicos. Numeros de 1996. Revista Anual del Seminario de Estudios Hispánicos "Fec Onís," 1996.

1996 "The Essence of Time: Time and Imagery in Leslie Marmon Silko's Ceremony" *Proceedings Graduate English Society's Graduate Student Conference*. Lubbock: Graduate English Society of Te University, 1996.

1995 "Lose the Textbook! Teaching Developmental Writing in the Networked Computer Classro *Delta Kappa Gamma Bulletin* Spring 1995 (vol. 61-3), 17-21.

Dan Althoff

Althoff, D. (2008). [Review of the book *A history of Afro-Hispanic language: five centuries, five cor. Spanish in Context*, *5*(1), 143-147.

Althoff, F. D. (2006). Centralization vs. local initiatives. Mexican and U.S. legislation of Amerindian lal In M. Higalgo (Ed.), *Mexican indigenous languages at the dawn of the twenty-first century* (pp. 1 Berlin: Mouton deGruyter.

Althoff, F. D. & Hidalgo, M. (2005). [Review of the book Los estudios del español hablado entre 1950 períodos, disciplinas y corrientes]. Language in Society, 34(5), 816-819.

Althoff, F. D. (2001). Hispanic and Afro-Hispanic languages in the Americas. *International Journ Sociology of Language*, *149*, 145-155.

Althoff, F. D. (2000). Pseudo-Africanisms in Costa Chica Mexican Spanish. In M. M. T. Henderso 1999 Mid-America Linguistics Conference Papers (pp. 25-33). Lawrence: University of Kansas Li Department.

Althoff, D. (1994). Afro-mestizo speech from Costa Chica, Guerrero: from Cuaji to *Cuijla*. *Language I and Language Planning*, 18(3), 242-256.

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Janet (Jani) Barker

Peer-Reviewed Essays

"Virtuous Transgressors, Not Moral Saints: Child Characters in Contemporary Children's Literature." Children's Literature. Ed. Claudia Mills. Ashgate Studies in Childhood series. [under contract, forthco

"A Really Big Theme": Americanization and World Peace—Internationalism and/as Nationalism in Li Perkins's Twins Series. *Our Chums in the Family of Nations: Internationalism in Children's Series*. Marietta Frank and Karen Sands-O'Connor. Palgrave Macmillan's Critical Approaches to Children's I series. [under contract for publication in 2014]

"Naïve Narrators and Double Narratives of Racially-Motivated Violence in the Historical Fiction of Ch Paul Curtis." *Children's Literature* 41, 172-203. 2013.

Racial Identification and Audience in *Roll of Thunder, Hear My Cry* and *The Watsons Go to Birmi.* 1963. Children's Literature in Education, 41(2), 118-145. 2010.

Discipline and (Dis)order: Paternal Socialization in Jacob Abbott's Rollo Books. *Children's L Association Quarterly*, 18(3), 100-105. 1993.

Other Publications:

Boylston, Helen Dore. (2001). In V. Watson et. al. (Eds.) *The Cambridge Guide to Children's Books in* (p. 101). Cambridge: Cambridge UP.

Elsie Dinsmore series. (2001). In V. Watson et. al. (Eds.) *The Cambridge Guide to Children's English.* (p. 234). Cambridge: Cambridge UP.

Five Little Peppers series. (2001). In V. Watson et. al. (Eds.) *The Cambridge Guide to Children's English.* (pp. 262-263). Cambridge: Cambridge UP.

May, Sophie [Rebecca Sophia Clarke]. (2001). In V. Watson et. al. (Eds.) *The Cambridge Guide to C Books in English.* (p. 473). Cambridge: Cambridge UP.

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Pansy. (2001). In V. Watson et. al. (Eds.) *The Cambridge Guide to Children's Books in English.* Cambridge: Cambridge UP.

Rollo books. (2001). In V. Watson et. al. (Eds.) *The Cambridge Guide to Children's Books in Eng* 614). Cambridge: Cambridge UP.

Story of a Bad Boy. (2001). In V. Watson et. al. (Eds.) *The Cambridge Guide to Children's Books in* (pp. 675-676). Cambridge: Cambridge UP.

Warner, Susan. (2001). In V. Watson et. al. (Eds.) *The Cambridge Guide to Children's Books in Eng* 741). Cambridge: Cambridge UP.

Lisa Coleman

Books and Monographs:

2010. Coleman, Lisa L. and Jonathan Kotinek, eds. *Monograph on Diversity Issues in Honors: Sε Table for Diversity*, Lincoln, Nebraska: National Collegiate Honors Council.

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Tara Hembrough

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Exhibit C

Faculty Senate Minutes Wednesday, November 29, 2017 Meeting #7, Fall Semester 2017 3:30 p.m., Classroom Building 118 As approved on December 6, 2017

Attending:

Stan Alluisi Diane Dixon Crystal Moore Chris Moretti Blythe Duell Daniel Althoff Kathy Boothe Steven Emge Josh Nannestad William Fridley **Brandon Burnette** Rhonda Richards F.R. Clark Karl Frinkle Michael Scheuerman Kay Daigle Charles Matthews

Not Attending:

Han-Sheng Chen, Brad Ludrick

Guests:

Dr. Clark, Carolyn Fridley

- I. Call to Order and Welcome @ 3:30 by Chair Althoff
- **II. Approval of Minutes from November 15, 2017.** After a discussion of proposed and agreed to edits, the vote to approve the minutes was 13= yes, 2=no, and 0 abstentions.

Next, based on an invitation from Chair Althoff, Dr. Clark spoke about his/SOSU's Faculty hiring practices. He stated that SOSU is in a period of trying to preserve and revitalize as many vacated positions as possible – especially due to two years of double digit cuts from the State. He also shared that a significant loss of employees, including senior faculty, admin, and staff was due to SOSU's recent retirement incentive. He offered SOSU's priority was to fill the most recently vacated critical seats, such as Art, Aviation, and EIL positions.

- A. Dr. Clark also described his parameters that influence the overall decision-making as:
- 1. Productivity: Student credit hours (SCH) within the department. 2/3 of our budget comes from tuition and fees, including overall production. SCH within majors, general education, and within discipline. Disruption to discipline, departments, and/or overall university. For example, we recently lost our pure Math Ed. Professor, which could impact our M.Ed. C&I in Math program. Due to SOSU's university mission and vision, we also have some majors that are more high profile for the region and/or community, which has an impact on our HLC accreditation. He added that SOSU Administration looks at how SCH production is divided amongst different types of departments/programs, as well as cost per credit generation in majors, cost of salaries, and employee benefit costs. The goal is to position us as best as possible in these harsh higher-ed and statewide economic times.
- 2. Historically, HLC looked at overall university personnel and did not typically drill down to the department and discipline level. Despite that, starting Fall 2018, HLC accreditors will be drilling down to individual Faculty qualifications. Accreditors are looking for faculty that are qualified in their teaching area/discipline in terms of academic and/or *tested experience*. HLC prefers degrees in disciplines and one-degree level above that which you are teaching; equivalent experience is somewhat acceptable. Thus, we have to maintain certain faculty placements to satisfy these requirements.

3. Some specialty accreditations also influence faculty hiring practices. For example, K-CREP (Counseling program) has a specific student-to-full-time faculty ratio. SOSU also prioritizes maintaining regional and specialty accreditation. The administration is also always mindful of possible, yet announced retirements in their hiring plan.

- 4. Longitudinally, SOSU employed 165 total faculty 20+ years ago, which is higher than our current faculty employment totals. As programs grow, we can start to fill some gaps that were left due to budgetary issues. We will continue to have to rely on high-qualified adjuncts in specialty and high need areas. To empower our recruitment of highly qualified faculty and based on market forces, our SOSU President is able to grant tenure upon entry, which is usually based on the hiring department's recommendation. Some professors can also be paid more due to endowments, SOSU Foundation money, and OK Regents funding. Due to the rapidity of growth in MBA program, we will be able to fill a JMSB Management and Marketing Professor position by early next year utilizing existing funds.
- 5. One senator asked if we are ever in a position to hire brand new faculty, e.g. the faculty growth model and if there was an annual/semi-annual deadline for department chairs to submit employment request forms. Dr. Clark stated that he asks all department chairs to submit their requests, asap in order to be processed through the various approval levels in a timely manner. The goal is to have requests to central administration early in the Fall so that the actual hiring process isn't rushed and we get the best pool of candidates possible for all positions. Dr. Clark reports that he continues to advocate for unfilled, high need faculty positions.
- 6. Several senators commented that the senate was hoping for a more standard, fair, and transparent faculty hiring process that less "piece meal." The senate would appreciate a more strategic plan approach to requests versus the individual-based, "extenuating circumstance" – type hiring request." Dr. Clark stated that he is not opposed and supportive of a hiring request deadline for all departments. He reiterated that his current main priority is to help a rapidly growing area – SOSU's MBA program based on their sustained growth pattern.
- 7. Speaking on behalf of the Faculty Senate Executive Committee (FSEC), a senator recommended that all department chairs submit requests by a due date. Then, the administration will make all those request available on a shared cloud-based drive and publish the hiring criteria. Lastly, the administration should then follow-up and publish the response (hire or not and when) to the request. It was also noted that some department chairs have more a vested interest in some of their program areas over other areas. Also, that some department chairs and faculty have more input or influence based on the decision due to seniority and social capital. Another senator commented on his/her feeling like there was a lack of transparency in the current hiring decision-making process. Another senator requested that the FS craft a proposal of acceptable related policy and procedures for further consideration, which could include the following: (a) Employee request form, and (b) formal response form that includes why the proposal was accepted or rejected. Dr. Clark stated that he felt that was a reasonable request and that he would help draft it. Dr. Clark also stated that he was concerned that the described efforts may provide extra work for an over-taxed faculty. Despite this, the described faculty hiring process efforts may warrant extra scrutiny due to the overall importance to SOSU.
- 8. Switching to another topic, Dr. Clark also mentioned that he will be meeting with the SOSU

Staff Association (SSA), SOSU Student Government Association (SGA), and FS in the next couple of weeks regarding changing the academic calendar by eliminating Fall Break and extending Thanksgiving Break to a full week. Some of SOSU feel that Fall Break is especially disruptive to online, 7 week students and is causing cancelled classes and increased absences. A senator commented that one of the long running reasons for Fall Break was the SE OK culture of opening the hunting season that week.

- 9. Dr. Clark also mentioned that some students were concerns about the payment to Dr. Tudor for settling her case. He informed us that all parties will still need to meet the Judge, per jury recommendation and that nothing has been finalized yet. He also stated that SOSU has already budgeted for our part of the maximum possible award.
- 10. It was confirmed that the move of Occupational Health & Safety to JMSB have been accounted for in the Senate voting member counts.
- 11. In summary, Dr. Clark reiterated that he is open to partnering with Faculty Senate. His intentions are good for both Faculty and students.
- B. Due to the previous conversation taking almost 1.5 hours and the vast majority of the FS meeting allotted time, Senator Duell motioned to postpone rest of agenda until the next meeting, Senator Scheuerman seconded. Vote: 15 = yes, 0 = no,

III. **Faculty Senate Committee Reports**

- A. University Affairs
- B. Planning Committee
- C. Personnel Policies Committee Motion to revise APPM 4.6.3: Revised motion for changes and additions to

APPM 4.6.3. The original motion from the Personnel Policies Committee was postponed at the 11-15-2017 meeting.

- D. Executive Committee
- E. Committee on Committees
- F. Budget Committee

IV. **Old Business**

A. SE Hiring Advisory Committee

V. **New Business**

A. Online Course Review Policy (postponed from November 15,2017)

References: https://www.se.edu/org/faculty-senate/files/2017/03/Proposed-Online-Certification-Third-Draft-.pdf and

https://www.se.edu/org/faculty-senate/files/2017/04/FS-DEC-Minutes-3-28-17.pdf

- B. Shortening Add/Drop Period at Beginning of New Semester
- C. Final Exam Week Lunch
- Motion to adjourn @4:59pm by Senator Frinkle, 2nd Senator Alluisi. Vote: 15 = yes. VI.

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Minutes respectfully by Crystal Moore, Recorder

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Exhibit 3

Declaration of Ms. Carolyn Fridley

- I am temporary full time instructor of English in the English,
 Humanities, and Languages Department ("English Department") at
 Southeastern Oklahoma State University ("Southeastern").
- I joined the English Department in January 2013, after Dr. Tudor's departure. I am acquainted with Dr. Tudor, but we have not yet had the opportunity to work together in the English Department.
- It is my understanding that Dr. Tudor desires to return to Southeastern and rejoin the English Department.
- 4 I would personally welcome Dr. Tudor back to the English Department.

I state under penalty of perjury that the foregoing is true and correct.

Executed on (date) 1227 17 in (location) Columbus Ohio

Ms. Carolyn Fridley

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Exhibit 4

Declaration of Mrs. Jonelle (Gascoigne) Weier

- 1. I am an undergraduate student at Harvard University's Extension School in Cambridge, Massachusetts. I am presently preparing to apply for graduate school, seeking a masters degree in theological studies and plan to pursue a doctorate in the future.
- 2. I attended Collin College in Plano, Texas from 2012 through 2015.
- 3. I graduated from Collin College *summa cum laude* with an Associates of Art degree with an emphasis in Philosophy in May 2015. In total, I completed 60 academic units at Collin College.
- 4. I took my studies at Collin College very seriously. I participated in student organizations and activities and endeavored to get the most out of my classes. Among other things, during my tenure at Collin College, I served as the Honors Institute Student Organization president, served as the assistant to the Honor's Institute's director, and also presented at Collin College's Undergraduate Interdisciplinary Student Research Conference.
- 5. Collin College has used my story in promotional materials. A true and accurate copy of a Collin College promotional page that discusses my path to Harvard is appended hereto as **Exhibit A**.

- 6. While a student at Collin College, I took two classes with Dr. Rachel Tudor—Composition 2 and Early American Literature—in 2013. My husband, Allen Weier, at my recommendation, took one class with Dr. Tudor in 2015.
- 7. Dr. Tudor is an amazing professor and continues to this day to have a deep and profound impact on how I approach my studies and my academic career.
- 8. I am appreciative of the opportunities that my education at Collin College has provided me. I am also grateful for the wonderful support that many of my Collin College professors have given me throughout the years.
- 9. Dr. Rachel Tudor stands out from the other professors I had at Collin College. With all due respect to my other professors, Dr. Tudor was a remarkably better than most of my other professors. Among other things, Dr. Tudor demonstrated a level of academic rigor that most of my other Collin College professors never did. I very much appreciated Dr. Tudor's seminar style of teaching and also greatly enjoyed the primary texts she emphasized in her classes. I remember fondly Dr. Tudor's dialectic teaching methods. I also appreciate the time and care Dr. Tudor put into structuring her classes and providing feedback on student papers.
- 10. In my opinion, Dr. Tudor strove to create and maintain a respectful and safe classroom environment for all of her students regardless of our

backgrounds or political leanings. Dr. Tudor encouraged all of her students to engage with one another and share our viewpoints in respectful and collegial ways.

- 11. I never witnessed Dr. Tudor bullying or maligning students, even if those students had different viewpoints than she did.
- 12. I have discussed Dr. Tudor's teaching with my husband on several occasions. My husband has told me that he never witnessed Dr. Tudor bully or malign students, even if those students had different viewpoints than she did.
- 13. In both of the classes that I took with Dr. Tudor, she employed "peer review" as a pedagogical tool to teach students composition. Dr. Tudor's version of peer review involved students peer editing each other's essays and occasionally involved Dr. Tudor herself editing papers in front of the classroom. I personally found peer review to be an effective way of teaching composition and personally benefited from the peer review process. To my recollection, Dr. Tudor employed peer review in respectful and appropriate ways. Through peer review, students were encouraged to share and critique each other's writing. I believe that this collegial but critical exchange of ideas was always done in a respectful manner and helped make the students—myself included—better writers.

- 14. I believe that Dr. Tudor is a great professor and teacher. I have had several conversations with my husband about Dr. Tudor's teaching—he agrees with me that Dr. Tudor is a great professor and teacher.
- 15. After I took two classes with Dr. Tudor, I was so moved by her passion for teaching and enthusiasm for her subject matter that I nominated her for Collin College's Outstanding Professor award. In the nomination form, I described in detail why at the time I believed Dr. Tudor is an amazing professor deserving of recognition from Collin College. A true copy of my nomination form is attached hereto as **Exhibit B** (bates marked PI000026 through PI000028 in the lower right hand corner).
- 16. At the time I was Dr. Tudor's student, I did not know that she is a transgender woman. Dr. Tudor never discussed her personal life in class.
- 17. At the time I was Dr. Tudor's student, I did not know that she was involved in a legal dispute with Southeastern Oklahoma State University and the Regional University System of Oklahoma.
- 18. It is my understanding that Dr. Tudor wishes to return to Southeastern Oklahoma State University and to teach in Southeastern's English, Humanities, and Languages Department. Based upon my experience with Dr. Tudor at Collin College and my husband's experience, I can emphatically say that Southeastern's students would benefit from Dr. Tudor's return.

19. Dr. Tudor's teaching is a great exhibit of what professors in higher education should strive to be.

I state under penalty of perjury that the foregoing is true and correct.

Executed on (date) $\frac{Q}{27/17}$ in (location) $\frac{Rockwall}{3}TX$

Mrs. Jonelle (Gascoigne) Weier

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Exhibit A



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THE KEY THAT OPENS DOORS

Collin College Students Chase Their Harvard Dreams



Growing up in Amman, Jordan, Collin College Alumnus Farid Nemri could see the value of a good education all around him. As is the case in the United States, many of his country's leaders had attended Ivy League schools before returning home to help others.

"When they came back, they worked in great positions where they could create change and improve their country," Nemri said. "My dad always told me that education is the most important thing. It's the key that opens doors."

His father's advice is holding true for Nemri, whose education at Collin College and the people he met there have been keys to achieving his dream. After a lengthy admission process. Nemri has been accepted to the Harvard Extension School's baccalaureate program for the fall 2015 semester.

The Harvard Extension School offers both undergraduate and graduate degree tracks in addition to its role as a global continuing education resource for people seeking a Harvard education. A mix of web conference and select campus-based classes allows students to reap the benefits of the Ivy League without taking on the

debt that usually accompanies them.

As one of 12 degree-granting programs at Harvard, the extension school also gives its students access to almost all of the resources available to traditional students, including its libraries, its faculty and events on campus.

For Nemri, who plans to move to Cambridge soon, the opportunity is a dream come true. He remembers talking with his father about the university at a young age, seeking out articles about it online and reading the Harvard Gazette to learn

"I appreciate lvy League schools in general," he said. "I have always wanted to attend one, but Harvard was always close to my heart.'

Nemri isn't the only one. Jonelle Gascoigne, a 2015 graduate of Collin College and the outgoing Honors Institute Student Organization president, is also going through the admissions process this fall. Gascoigne said she appreciates the structure of the extension school's classes, which remind her of the honors classes she took at Collin.

"The classes are very much focused on the professor's passion," she said. "I just think you learn so much more when your professors love what they are talking about."

Gascoigne's passion is religion and, if accepted, she plans to earn a bachelor's degree with a concentration in theological

"I absolutely love religion," she said. "I think it is important to study, because how can you understand someone if you don't know their primary understanding of the cosmos."

Her love of the subject comes, in part, from her father who is currently seeking his doctorate of divinity. Homeschooled for much of her life, Gascoigne pointed to Collin's dual-credit courses as reinforcing a desire for higher education and her time in honors program with helping prepare her for the challenges ahead.

To earn her degree through the extension school, though, Gascoigne will first have to work her way into the program as Nemri did. While anyone can take classes through the extension school, only a small percentage of students are accepted into the degree programs.

Students must first take three required courses to determine if they meet the school's academic standards and pass with a 3.0. Nemri passed with a 4.0. He also had to prove his critical reading and writing skills, meet an English proficiency requirement and write two entrance essays, which were reviewed by the admissions committee that ultimately accepts or rejects a student's application.

Nemri said he was confident he would be admitted, in part because of his experiences at Collin, where he focused on core science classes. While he has not locked himself into one field, he said he would like to do something in medicine or dentistry.

"I would like to pursue dentistry, but I also like working in international relations, dealing with global health care issues," he said. "Hopefully, getting a bachelor's degree from Harvard would make it more likely to get into a prestigious professional school, such as one of Harvard's."

An honors-level science education wasn't the only thing he took from Collin, though. He also learned leadership during his time in the Phi Theta Kappa Honors Society, where he served as the public relations vice president and ultimately as president of the college's Alpha Mu Tau chapter. He said that his professors and the PTK advisors, especially Dr. Jessica Hargis, a professor of political science, all made a significant impression on him.

The Key That Opens Doogase 5:15-cv-00324-C Document 271-5ttp#filed 12/29/41/20941/2018 Page: 18-6102 Document: 010110085921 Date Filed: 11/19/2018 Page: 165

His involvement in the student organization also helped him in another way. A PTK scholarship paid for the first three classes required for admission.

"Collin College was the reason I was able to pursue my dreams. It was the first step," he said. "It was time for me to take the next step and I am glad to have taken this Harvard experience as my next step."

For more information on Collin College, visit www.collin.edu.

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Exhibit B

COLLIN COLLEGE / OUTSTANDING PROFESSOR AWARD Student Nomination Form

Dr. Tudor made me love literature, specifically Greek dramas. I entered into her composition 2 class expecting to be bored to death with Sophales, Euroides and Augustus Aeschy is I lest noting the society apprention of these authors. Her comp 2 class largely focus around the understanding of these ancient texts (which have come to be pivital for me in other classes. My understanding of these texts have larged me in my following American literature, -Boxton literature, and Philosophy Class, Her classes largely involved group discossions in which all of the class would sit in and talk about what he thought of the stories. Then we had days in which we would only newse papers and then discuss what was wrong with them in the circle. The circle was a great instruction technique because it ensured the entire class by being face to face • In what ways did the professor inspire and motivate students to a higher level

One of my favorite things she did was that one remision days If you brought a death Countrion vous required) you recived on extra 10 points on the final paper and if you direct you had 10 points dedecated. By doing mis she remeded the students who were dering what try should be and encouraging more who may not have wrote a dozet to de so. Anoter may moreonous she encouraged her stillents ness by having a competition for the best blegs, he capt an white blos with our personal thoughts about the readings. At the end of the year the class noted on the #1 blos recrewed on extra 100 Paints. She also alimed chances for team leaders. I know this may Seen a little soull oriented but I really feel the number of way She motivated me unspage 2 of 4 our class discussions which emplomered me to shore my thoughts.

In what ways did the professor demonstrate an outstanding ability to

As previously & discissed, Dr. Felor engaged her stidents through discissions about the texts. I feel This was more in my American Literature course I took with her during a summer semester. Every day we would meet and primarily watch clips about our the athors we were reading and talk in circles the rest of the Redoct. In the disassions, She other led them by focusing us on certain pussages or simply by starting the conversations. Then after she withted a conversation she would often was let stickents Speak their mines in a casual forum, and months only did see allow others to talk, when discussing the text sine rarrely argued that her Position was the only right one. Instead, she ensuged students in dialouse that did not to very on her authority as a proffesor but rather telyed on her authority of a fatherithment two way conversation. Through omiclass comersations, Dr. Tudor was able to relate and interact not Strelets in a way that support critical thinking and open walouge.

> In what ways does the professor demonstrate support for the Collin core values? The Collin core values include a passion for learning, service and involvement, creativity and innovation, academic excellence, dignity and

Rachel Tudor demonstrates a passion for learning in two ways. The In the America literative class, Dr. Todor would offen assign readings from other genres of literature in order to demonstrate that werest texts influence modern literature. The By some beyond the realm of the course in order to provide has stickents with a better bass to inclusted the course mutarial. By enginesmy her Shelves in meaningful diclose, Dr. Lever demonstrated Les midwenent with her Students. Throughout the two courses I took with her Dr Tucker demonstrated has ability to use several different teaching strategies including intervers, documenties, ontside texts, onthe Sloss, storp discussing and innowhere verys to earn wester credit. Ruebel todar was also and mountine verys to earn extra with essays. I mentain that while extremely critical clost fail page 3 of 4 were also graded very critically these were my favorite dussess the essays content she was also always these were my favorite dussess the essays content she was also always response to content is respect strent mentains and contents.

 Please provide additional information supporting the nomination of your professor not covered in the previous questions.

Pospite this hund pronomination I also write an Fishing regarding her influence on my school life in a Ph. Theta Kapon Essay. Ruchel Tudor directly influenced har I viewed education and se instilled in me a love of literature that I contine contine to have. Action I am every able to attain my dream of becoming a proflesor of religion, I will talk about Dr. Tudor as the proflesor of religion, I will talk about Dr. Tudor as the proflesor that really staffed a fire in me for both evapor-level education and lifesofure. I am extremely thankful about of a position as her one day.

CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2018, I electronically transmitted a copy of the foregoing Appendix to the Clerk of the Court by using the ECF System for filing and automatic service of Appendix to all counsel of record herein.

/s/ Marie Eisela Galindo MARIE E. GALINDO TX BAR NO. 00796592

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