

**In the United States Court of Appeals for the Tenth Circuit**

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DR. RACHEL TUDOR,  
*Plaintiff-Appellant/Cross-Appellee*  
v.

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

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

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**PLAINTIFF-APPELLANT/CROSS-APPELLEEDR. RACHEL TUDOR'S  
APPENDIX VOLUME 4 OF 9**

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# Exhibit 5



# Rachel Tudor

Professor in the English department  
at [Collin College](#), McKinney, TX

**ARE YOU RACHEL?**

**OVERALL  
QUALITY  
4.7**

WOULD  
TAKE  
AGAIN

**N/A**

LEVEL  
OF  
DIFFICULTY

## Top 20 Tags for this Professor

See how other students describe this professor.

**CLEAR GRADING CRITERIA (17)**

**PARTICIPATION MATTERS (16)**

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**RESPECTED (12)**

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**AMAZING LECTURES (3)**

**GROUP PROJECTS (2) CARING (2)**

CHOOSE YOUR TAGS

**15-cv-324 OPENING BRIEF - TUDOR - Vol. 4 - 002**

3.2

HOTNESS



### 43 Student Ratings

Start typing your comment...

CONTINUE YOUR

350 characters left

12/10/2015

**AWESOME**

5.0 OVERALL QUALITY

2.0 LEVEL OF DIFFICULTY

ENGL1301

For Credit:

Yes

Attendance:

Mandatory

Textbook Used:

Yes

Would Take Again:

Yes

Grade Received:

C+

**SKIP CLASS? YOU WON'T PASS.**

**PARTICIPATION MATTERS**

Super amazing class!! I liked that I got to read other student papers and work with a group. Made the class real friendly. Lots of reading and writing though. Professor is very nice and kind but serious.

4 people found this useful

0 people did not find this useful

12/09/2015

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENG1302

For Credit:

Yes

Attendance:

Mandatory

Textbook Used:

Yes

Would Take Again:

N/A

Grade Received:

C+

**GET READY TO READ**

**TOUGH GRADER**

**SKIP CLASS? YOU WON'T PASS.**

I liked that I got to know other students. Lots of peer reviewing--if you hate peer-reviewing, this class is not for you. Lots of class...

about current events.  
Gotta attend to pass. no kidding lol

1 person found this useful  
0 people did not find this useful

12/08/2015

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:

Yes

Attendance:

Mandatory

Textbook Used:

Yes

Would Take Again:

N/A

Grade Received:

C+

INSPIRATIONAL

RESPECTED

SKIP CLASS? YOU WON'T PASS.

Lots of peer reviewing and blogging required.  
Take it if you are committed to learning and reading and thinking.

Lots of THINKING!! lol  
Seriously, if you are not serious--this is not a class 4 u. If you are, go for it--u will learn a lot.

4 people found this useful  
0 people did not find this useful

12/08/2015

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGL1302

For Credit:

Yes

Attendance:

Mandatory

Textbook Used:

Yes

Would Take Again:

Yes

Grade Received:

B

GET READY TO READ

CLEAR GRADING CRITERIA

She is clear and confident with the materials she teaches. You must work hard to get a good grade but you may actually learn something if you listen and do the work. Lots of writing and peer-reviewing and class discussion.

2 people found this useful  
0 people did not find this useful

12/07/2015

# AVERAGE

**2.5** OVERALL QUALITY

**3.0** LEVEL OF DIFFICULTY

**For Credit:**  
Yes  
**Attendance:**  
N/A

**Textbook Used:**  
No  
**Would Take Again:**  
N/A  
**Grade Received:**  
C+

## SKIP CLASS? YOU WON'T PASS.

If you aren't liberal, have fun passing. Essay topics are very political and controversial. She gets angry when you don't agree with her. Worst teacher you could possibly get.

2 people found this useful

3 people did not find this useful

05/01/2015

# AWESOME

**5.0** OVERALL QUALITY

**4.0** LEVEL OF DIFFICULTY

ENGL1302

**For Credit:**  
Yes  
**Attendance:**  
Mandatory

**Textbook Used:**  
Yes  
**Would Take Again:**  
Yes  
**Grade Received:**  
B-

## PARTICIPATION MATTERS

### CLEAR GRADING CRITERIA

She is a great teacher. She's definitely tough but fair. Though a lot of people complain that she gives too much homework, it's my own fault that I leave things until the last minute.

4 people found this useful

0 people did not find this useful

02/02/2015

# AWESOME

**5.0** OVERALL QUALITY

**4.0** LEVEL OF DIFFICULTY

ENGL1301

**For Credit:**  
Yes  
**Attendance:**  
Mandatory

**Textbook Used:**  
Yes  
**Would Take Again:**  
Yes  
**Grade Received:**  
B

## RESPECTED

### GIVES GOOD FEEDBACK

Everything up front -love it. Examples help with assignments - cool. If you listen, follow instructions, attend class, get everything in on time - an easy B or A. Reminders in class also a great help. Not a fan of English.

3 people found this useful  
0 people did not find this useful

02/02/2015

**AWESOME**

**5.0** OVERALL QUALITY

**3.0** LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:

Yes

Attendance:

N/A

Textbook Used:

Yes

Would Take Again:

N/A

Grade Received:

N/A

**SKIP CLASS? YOU WON'T PASS.**

**CLEAR GRADING CRITERIA**

**GET READY TO READ**

Challenging. Her knowledge is freakin' amazing!!! Really works hard at being a great instructor-adjusts well to class needs.

3 people found this useful  
0 people did not find this useful

02/02/2015

**AWESOME**

**5.0** OVERALL QUALITY

**3.0** LEVEL OF DIFFICULTY

ENGLISH2332

For Credit:

Yes

Attendance:

N/A

Textbook Used:

Yes

Would Take Again:

Yes

Grade Received:

N/A

**INSPIRATIONAL**

**AMAZING LECTURES**

Her passion comes through in her work. She cares and is very interesting. She explains all things in great detail and makes sure we understand.

1 person found this useful  
0 people did not find this useful

02/01/2015

**AWESOME**

**5.0** OVERALL QUALITY

**3.0** LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:

Yes

Attendance:

N/A

Textbook Used:

Yes

Would Take Again:

N/A

Grade Received:

N/A

**PARTICIPATION MATTERS**

**CLEAR GRADING CRITERIA**

**GIVES GOOD FEEDBACK**

Very good Professor, I am probably more conservative but she is very fair. I saw no evidence of

taught class well. I learned a lot and I am an English Major. I would definitely take her class again. Smart, fair, and Good Teacher. Highly Recommend. Class had strong diversity of opinions on all kinds of issues, was fun.

1 person found this useful  
0 people did not find this useful

02/01/2015

**AWESOME**

**5.0** OVERALL QUALITY

**3.0** LEVEL OF DIFFICULTY

ENGL1302

For Credit: Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

**PARTICIPATION MATTERS**

**CLEAR GRADING CRITERIA**

**GET READY TO READ**

I really like her! Her class style is basically group discussion. I have been taking her English classes for two semester.

1 person found this useful  
0 people did not find this useful

01/01/2015

**AWESOME**

**5.0** OVERALL QUALITY

**3.0** LEVEL OF DIFFICULTY

ENGLISH1301

For Credit: Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B+

**PARTICIPATION MATTERS**

**CLEAR GRADING CRITERIA**

**GROUP PROJECTS**

one of the best teachers for LEARNING.. she doesn't give you the answer, but gives you all the resources to make you successful in finding it. She takes the time to answer your questions thoroughly. I give her the most respect for this

her lifetime to help others.. some people are just meant for teaching. luv learning about mythology.

1 person found this useful 0 people did not find this useful

01/01/2015

AWESOME

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH2332

For Credit:

Yes

Attendance:

Mandatory

Textbook Used:

Yes

Would Take Again:

Yes

Grade Received:

A-

PARTICIPATION MATTERS

GET READY TO READ

Really a fantastic teacher. She brings a huge amount of enthusiasm to the class that makes it much easier to get through. Grading is designed to make it hard to fail, however an A takes work and is not easy. Helpful beyond belief and extremely kind and understanding

1 person found this useful 0 people did not find this useful

01/01/2015

AWESOME

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:

Yes

Attendance:

Mandatory

Textbook Used:

Yes

Would Take Again:

N/A

Grade Received:

B+

INSPIRATIONAL

RESPECTED

GIVES GOOD FEEDBACK

Professor Tudor is an amazing teacher. She gives you exactly what you give her. As long as you read the assigned reading, you are just fine. Advise, do your She notices that you are putting an effort. A

Earned

1 person found this useful 0 people did not find this useful

found this useful find this useful

12/31/2014

**AWESOME**

**5.0** OVERALL QUALITY

**4.0** LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:

Yes

Attendance:

Mandatory

Textbook Used:

Yes

Would Take Again:

N/A

Grade Received:

B+

**CLEAR GRADING CRITERIA**

**INSPIRATIONAL**

**PARTICIPATION MATTERS**

She is an awesome teacher because she never makes you feel stupid. Writing essays intimidates many people and she gives you the tools and shows you how to use them to overcome the obstacles, which stand in your way. She is fair, helpful, well-organized, and clear of what she expects.

2 people found this useful

0 people did not find this useful

12/31/2014

**AWESOME**

**5.0** OVERALL QUALITY

**3.0** LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:

Yes

Attendance:

Mandatory

Textbook Used:

Yes

Would Take Again:

Yes

Grade Received:

B

**GET READY TO READ**

**SKIP CLASS? YOU WON'T PASS.**

She's a very nice woman and very helpful. She makes you work hard but helps you along the way. learned more in this class than i thought i would and she helped me to enjoy it. A lot of writing and reading is required though, so don't take this class if you don't want to be challenged!

2 people found this useful

0 people did not find this useful



12/31/2014

**AWESOME**

**5.0** OVERALL QUALITY

**3.0** LEVEL OF DIFFICULTY

ENGLISH1302

**For Credit:**

Yes

**Attendance:**

Mandatory

**Textbook Used:**

Yes

**Would Take Again:**

Yes

**Grade Received:**

B+

**INSPIRATIONAL**

**PARTICIPATION MATTERS**

If you need to take a critical thinking class, she is the teacher you should try to get. Very clear on grading criteria and is very understanding. By far the best teacher I have had in college thus far. Sweet lady. I didn't think I was good at critical thinking writing essays until I took her class and actually really enjoyed it.

2 people found this useful

0 people did not find this useful

12/31/2014

**AWESOME**

**5.0** OVERALL QUALITY

**3.0** LEVEL OF DIFFICULTY

1301

**For Credit:**

Yes

**Attendance:**

Mandatory

**Textbook Used:**

Yes

**Would Take Again:**

N/A

**Grade Received:**

B+

**RESPECTED**

**GROUP PROJECTS**

**PARTICIPATION MATTERS**

I took this class last semester and it was a great experience. The class is hands on and sometimes very challenging - lots of group work. I learned a lot.

1 person found this useful

0 people did not find this useful

12/31/2014

**AWESOME**

**5.0** OVERALL QUALITY

**3.0** LEVEL OF DIFFICULTY

ENGLISH1302

**For Credit:**

Yes

**Attendance:**

Mandatory

**INSPIRATIONAL**

**CLEAR GRADING CRITERIA**

She's a wonderful teacher

Textbook Used:  
Yes  
Would Take Again:  
Yes  
Grade Received:  
B

ent. Knows what she's  
talking about. Very open  
to opinion and discus-  
sion and very smart! Her  
passion is very evident  
in her lectures.

1 person found this useful  
0 people did not find this useful

12/20/2014

AWESOME

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

INSPIRATIONAL

For Credit:  
Yes  
Attendance:  
N/A

CLEAR GRADING CRITERIA

Textbook Used:  
Yes  
Would Take Again:  
Yes  
Grade Received:  
N/A

She is awesome seems  
very intimidating at first,  
but she is one of the  
nicest professors. You  
will actually learn a lot  
from her. You need to be  
organized and make  
sure you check your syl-  
labus for assignments  
that may be due AHEAD  
of time. READ IT!!!! Be  
ON TIME! and SHOW UP!

3 people found this useful  
0 people did not find this useful

12/17/2014

AWESOME

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

SKIP CLASS? YOU WON'T PASS.

For Credit:Yes  
Attendance:  
Mandatory

CLEAR GRADING CRITERIA

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: B+

She comes off as being  
very strict when you first  
meet her, but as the se-  
mester goes on if you are  
a student who comes to  
class, and does your work  
you will see she truly  
cares to help you.

2 people found this useful  
0 people did not find this useful

12/08/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: N/A

**RESPECTED**

**INSPIRATIONAL**

**PARTICIPATION MATTERS**

Amazing professor! Not an "easy" class, but really interesting. I enjoy her quick pace and deep thoughts. She makes all students feel comfortable where they are in their journey. She has a passion for what she teaches and throws all of herself into it.

4 people found this useful

0 people did not find this useful

12/08/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: N/A

**INSPIRATIONAL**

**CLEAR GRADING CRITERIA**

Knows how to teach. Must read the articles and engage in class discussions. Take advantage of the inclass revisions. Great writers will succeed but weak writers will struggle. It is not her fault if you don't apply yourself. Be responsible for own grade.

3 people found this useful

0 people did not find this useful

12/05/2014

**AWESOME**

ENGLISH1302

**CLEAR GRADING CRITERIA**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**3.0**

For Credit: Yes  
Attendance: Mandatory

**RESPECTED**

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: A-

She is a very helpful and good professor, but her grades are tough. The better you describe with a lot of examples, the better the grade you get. Also, write it to the point is essential. However she gives a lot of extra credits. I never got an A for my essays, but I got A for the class just because of the extra credits. Take her if you wanna learn

3 people found this useful

0 people did not find this useful

12/02/2014

AWESOME

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**2.0**

ENGLISH1301

For Credit: Yes  
Attendance: Mandatory

**AMAZING LECTURES**

**INSPIRATIONAL**

**RESPECTED**

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B+

Her class was truly a COLLEGE course. If you were not serious about learning you would not fair-well in her class. Her class was fun, exciting, and intense. She is truly the best instructor I have had.

3 people found this useful

0 people did not find this useful

11/23/2014

AWESOME

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**4.0**

ENGLISH1301

For Credit: Yes  
Attendance: Mandatory

**CLEAR GRADING CRITERIA**

**PARTICIPATION MATTERS**

Textbook Used: Yes

Would Take Again:  
Yes  
Grade Received: B

pretty tough, but I learned so much from the reading and about myself through the writing. I was not too enthused about this class, but it actually turned out to be one of my favorites because the material and discussions keep you engaged and thinking. I recommend her!

2 people found this useful  
0 people did not find this useful

11/21/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: N/A

**INSPIRATIONAL**

**TOUGH GRADER**

If you are serious about becoming a better writer- English major etc. **TAKE HER! She will get you right on track to where you are suppose to be! Lazy students NEED NOT APPLY.** She gives you work and readings that will ultimately give you a new outlook on life. I failed the class and still loved her :) That should speak volume!

4 people found this useful  
0 people did not find this useful

11/17/2014

**AWESOME**

5.0 OVERALL QUALITY

7.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes

**AMAZING LECTURES**

**RESPECTED**

**INSPIRATIONAL**

Would Take Again:  
N/A  
Grade Received: A-

and she changed my entire view of what writing is really about. I'm no pursuing my bachelors in English because of her and would like to teach college prep one day!

2 people found this useful  
0 people did not find this useful

11/17/2014

**AWESOME**

OVERALL QUALITY  
4.5

LEVEL OF DIFFICULTY  
4.0

ENGLISH1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: B+

**CLEAR GRADING CRITERIA**

**GET READY TO READ**

She knows her stuff, and cares about us all. You have to earn your grade and participate. Lectures, discussions and small group activities almost every class, she will not let you sleep or laze around in class. A lot of energy, take only if not lazy.

3 people found this useful  
0 people did not find this useful

11/17/2014

**AWESOME**

OVERALL QUALITY  
5.0

LEVEL OF DIFFICULTY  
3.0

ENGLIHS1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: B+

**CARING RESPECTED**

**INSPIRATIONAL**

Awesome woman. She respects her students and really cares about them. Her class was fun and informative. Wish I could take more classes with her.

2 people found this useful  
0 people did not find this useful

11/17/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: A-

**CARING**

**CLEAR GRADING CRITERIA**

Dr. Tudor is the best teacher i ever had. I was worried at first but she made is so easy for every-one. she explains every-thing very clearly. i loved her. i would highly recom-mend to take her. If you study and do the work, it easy to make A in her class. She also really care about her students.

3 people found this useful

0 people did not find this useful

10/31/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: B+

**PARTICIPATION MATTERS**

**SKIP CLASS? YOU WON'T PASS.**

I won't lie, she was a pret-ty tough grader, but she's so knowledgeable! She really knows what she's teaching and talking about, and she can really help you! One of my fa-vorite professors. She's really smart and I can tell she loves teaching!

4 people found this useful

0 people did not find this useful

10/31/2014

**AWESOME**

5.0 OVERALL QUALITY

ENGLISH1301

For Credit:Yes

**RESPECTED**

**PARTICIPATION MATTERS**

4.0 LEVEL OF DIFFICULTY

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: A-

GET READY TO READ

She is a great professor who will definitely improve your writing skills.

2 people found this useful  
0 people did not find this useful

10/30/2014

AWESOME

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

GET READY TO READ

PARTICIPATION MATTERS

If you pay attention and put forth an effort, shes a great teacher. I did not like English very much before taking her, but she helped me through it. If you really do try, she'll do her best to help you get a good grade.

3 people found this useful  
0 people did not find this useful

10/28/2014

AWESOME

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B+

RESPECTED

PARTICIPATION MATTERS

CLEAR GRADING CRITERIA

This professor has the utmost consideration for her students&their education. Puts in more time and effort than any professor ive ever taken. Any sabotage done to your grade would be on your behalf, not hers. I'm not the greatest writer and



derstood English, until  
this very class.

4  
people  
found  
this  
useful

0 people  
did not  
find this  
useful

10/23/2014

**AWESOME**

5.0  
OVERALL  
QUALITY

4.0  
LEVEL OF  
DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: N/A

**RESPECTED**

**CLEAR GRADING  
CRITERIA**

**GET READY TO READ**

**This class is AWESOME.**

Dr. Tudor is very clear in what she wants and extremely organized. Make sure you print out what she posts on Blackboard & STUDY ! This is def. not your average community college course so its not a "piece of cake"

3  
people  
found  
this  
useful

0 people  
did not  
find this  
useful

08/04/2014

**AWESOME**

5.0  
OVERALL  
QUALITY

3.0  
LEVEL OF  
DIFFICULTY

ENGL1302

For Credit:N/A  
Attendance: N/A

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: N/A

I liked how we talked more in-depth about things than in other classes I've had.

4  
people  
found  
this  
useful

0 people  
did not  
find this  
useful

07/30/2014

**AWESOME**

5.0  
OVERALL  
QUALITY

1.0  
LEVEL OF  
DIFFICULTY

ENGLI1302

For Credit:N/A  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: B

I really enjoyed the times the class formed a circle and we talked about what we were doing and reading. It helped me learn by taking part in my education.

4  
people  
found  
this  
useful

0 people  
did not  
find this  
useful

2 people found this useful  
0 people did not find this useful

07/16/2014

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**3.0**

ENGL1301

For Credit:N/A  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

i never liked english classes in school, but now i know english isn't just about punctuation. i think this will help me in my college classes.

2 people found this useful

0 people did not find this useful

07/03/2014

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**2.0**

1302

For Credit:N/A  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

Really GREAT class.

Learned a lot about writing and had fun working with other students.

4 people found this useful

0 people did not find this useful

05/09/2014

**AWFUL**

OVERALL QUALITY  
**1.0**

LEVEL OF DIFFICULTY  
**5.0**

COMP1302

For Credit:N/A  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

this class was very confusing and hard. and i tried to get help from her and she never helped me.

10 people found this useful

4 people did not find this useful

05/09/2014

**AWFUL**

OVERALL QUALITY  
**1.0**

LEVEL OF DIFFICULTY  
**5.0**

ENG1302

For Credit:N/A  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

do not take this professor because all of her essays are over greek mythology and if you ask her a question she won't answers it. she is also hard to here because she is very quite. attendance is mandatory and if you miss 4 days you automatically fail her class. and there are no

excused absences

6 people found this useful

4 people did not find this useful

09/11/2013

ENGCOMP1302

**AWESOME**

4.5 OVERALL QUALITY

2.0 LEVEL OF DIFFICULTY

For Credit:N/A  
Attendance: Not Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: A

I thought this class was going to be horrible, but in the end I really enjoyed Professor Tudor. You have to work for your grade, but pay attention in class - she will tell you what you need to know. There is A LOT of group work and group discussion. I would definitely take her again if I could!

3 people found this useful

0 people did not find this useful

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Only 1 in 33 Adults Can Pass

Offbeat

# Rachel Tudor

Professor in the English department  
at [Collin College](#), Plano, TX

**ARE YOU RACHEL?**

**OVERALL  
QUALITY  
4.7**

WOULD  
TAKE  
AGAIN

**N/A**

LEVEL  
OF  
DIFFICULTY

## Top 20 Tags for this Professor

See how other students describe this professor.

**CLEAR GRADING CRITERIA (79)**

**PARTICIPATION MATTERS (69)**

**GET READY TO READ (55)**

**RESPECTED (44)**

**SKIP CLASS? YOU WON'T PASS. (40)**

**INSPIRATIONAL (36)**

**TOUGH GRADER (26)**

**GIVES GOOD FEEDBACK (14)**

**LOTS OF HOMEWORK (9)**

**CARING (8)**

**AMAZING LECTURES (8)**

**SO MANY PAPERS (7)**

# 3.2

**HOTNESS**



**GROUP PROJECTS (3)**

**LECTURE HEAVY (2)**

CHOOSE YOUR TAGS

## 171 Student Ratings

Start typing your comment...

CONTINUE YOUR

350 characters left

08/26/2016

**AWESOME**

**5.0** OVERALL QUALITY

**5.0** LEVEL OF DIFFICULTY

ENGLISH1302

**GET READY TO READ**

**For Credit:**

Yes

**Attendance:**

Mandatory

**INSPIRATIONAL**

**SKIP CLASS? YOU WON'T PASS.**

**Textbook Used:**

Yes

**Would Take Again:**

Yes

**Grade Received:**

A

I was looking forward to taking Dr. Tudor's world literature course because I learned so much in her other classes and heard the wl was great. I can't believe collin college let her go!!!! WHY???? She was great!!! So sad, many :( s

8 people found this useful

0 people did not find this useful

06/26/2016

**AWESOME**

**5.0** OVERALL QUALITY

**5.0** LEVEL OF DIFFICULTY

COMP1302

**CARING**

**For Credit:**

Yes

**Attendance:**

Mandatory

**INSPIRATIONAL**

**PARTICIPATION MATTERS**

**Textbook Used:**

Yes

**Would Take Again:**

Yes

**Grade Received:**

R+

I learned a lot about writing, but also about why writing matters by reading...

about current events.

Many kudos to the prof for not being afraid to tackle lots of hot button issues--immigration, sexism, inequality, LGBT rights. Very brave!!!!

5 people found this useful 0 people did not find this useful

06/22/2016

GOOD

4.0 OVERALL QUALITY

2.0 LEVEL OF DIFFICULTY

ENGL1302

For Credit:

Yes

Attendance:

Mandatory

Textbook Used:

Yes

Would Take Again:

No

Grade Received:

A+

PARTICIPATION MATTERS

CLEAR GRADING CRITERIA

I am all about everything English, so naturally I was excited about the class and did very well in it. I received an A and the assignments were easy to understand and not very taxing at all. However, the professor and I disagreed on some points and that caused tension, because if you don't take her side with everything, you're wrong apparently.

2 people found this useful 3 people did not find this useful

05/23/2016

AWESOME

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGL1302

For Credit:

Yes

Attendance:

Mandatory

Textbook Used:

Yes

Would Take Again:

N/A

Grade Received:

A-

GIVES GOOD FEEDBACK

INSPIRATIONAL

PARTICIPATION MATTERS

One of the best professors at the college!!! I really like how she makes the course interesting by writing about

so much!!!! Made some great friends and feel like I'm a better person for the experience!! What a great teacher and human being!!!

11 people found this useful

2 people did not find this useful

05/20/2016

**GOOD**

**3.5** OVERALL QUALITY

**4.0** LEVEL OF DIFFICULTY

**COMP1302**

**For Credit:**

Yes

**Attendance:**

Mandatory

**Textbook Used:**

Yes

**Would Take Again:**

N/A

**Grade Received:**

A

**PARTICIPATION MATTERS**

**CLEAR GRADING CRITERIA**

**SKIP CLASS? YOU WON'T PASS.**

Overall I really enjoyed this class. She is very liberal. Part of what you learn in class is to know your audience. You need to remember your audience when you write in this class. I learned a lot. She is always available to answer questions. She wants you to do well. I wish she had chosen different topics for some of our writing assignments.

4 people found this useful

2 people did not find this useful

05/11/2016

**AWESOME**

**5.0** OVERALL QUALITY

**4.0** LEVEL OF DIFFICULTY

**ENGLISH2332**

**For Credit:**

Yes

**Attendance:**

Mandatory

**Textbook Used:**

Yes

**Would Take Again:**

Yes

**Grade Received:**

A

**AMAZING LECTURES**

**INSPIRATIONAL**

Lots of reading in this class but the professor makes it so interesting that I started looking forward to the next book. Until the final

exam I didn't even know  
what I knew lol!!!!!!

9 people found this useful  
4 people did not find this useful

05/09/2016

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:

Yes

Attendance:

Mandatory

Textbook Used:

Yes

Would Take Again:

N/A

Grade Received:

A-

**PARTICIPATION MATTERS**

**INSPIRATIONAL**

**CLEAR GRADING CRITERIA**

This has been a great semester with professor tudor!!! I learned a lot about current events as well as how to write about them! Very passionate and great human being!!!

8 people found this useful  
2 people did not find this useful

04/29/2016

**AVERAGE**

3.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGL1302

For Credit:

Yes

Attendance:

Not Mandatory

Textbook Used:

Yes

Would Take Again:

N/A

Grade Received:

B-

**GET READY TO READ**

**SO MANY PAPERS**

**AMAZING LECTURES**

This is an English class, expect alot of homework and long papers. This class is like a University class. She has alot of awesome topics that will be discussed. She makes you think about different opinions. She is liberal, don't argue. I chose the gaming paper. Must Blog, Hw, 3 pg paper, 8 pg research paper, annotated bib, reflection essay.

3 people found this useful  
1 person did not find this useful



Rate My Professors College - File My Review  
found this useful find this useful

03/27/2016

**AWESOME**

**5.0** OVERALL QUALITY

**2.0** LEVEL OF DIFFICULTY

ENGL1302

For Credit:

Yes

Attendance:

Mandatory

Textbook Used:

Yes

Would Take Again:

Yes

Grade Received:

A

INSPIRATIONAL

CLEAR GRADING CRITERIA

As an international students, it is difficult to understand all the professors because of language. Dr. Tudor is the best fit for all kind as she is the most understandable professor as per me so far. I would love to take all the classes she offers. Glad to have her as my professor.

8 people found this useful

0 people did not find this useful

03/22/2016

**AWESOME**

**5.0** OVERALL QUALITY

**3.0** LEVEL OF DIFFICULTY

ENGLISH2332

For Credit:

Yes

Attendance:

Mandatory

Textbook Used:

Yes

Would Take Again:

N/A

Grade Received:

B

PARTICIPATION MATTERS

RESPECTED

INSPIRATIONAL

Wow! I never thought that such old stories had so much to say to me. Dr. Tudor really makes these stories real.

6 people found this useful

0 people did not find this useful

03/19/2016

**GOOD**

**3.5** OVERALL QUALITY

**2.0** LEVEL OF DIFFICULTY

ENGL1301

For Credit:

Yes

Attendance:

Mandatory

Textbook Used:

Yes

Would Take Again:

N/A

GIVES GOOD FEEDBACK

CLEAR GRADING CRITERIA

A good teacher overall. She starts off a little distant and mean and I was worried about her at

Grade Received:  
A+

the semester she was nice and I was happy that I took her. The assignments she gives are easy and graded as you would expect. She gave out plenty of A's for the final research paper which not all teachers are even likely to do.

3 people found this useful  
0 people did not find this useful

01/05/2016

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

COMP1302

For Credit: Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B

**SKIP CLASS? YOU WON'T PASS.**

**PARTICIPATION MATTERS**

**GET READY TO READ**

I struggled for my B. Really thought id fail this class. **Dr Tudor is a great teacher.** Don't be late and read carefully follow all the instructions from the syllabus and you'll do great. **i love Dr Tudor her class helped me a lot**

10 people found this useful  
0 people did not find this useful

01/05/2016

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH2332

For Credit: Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: C

**CLEAR GRADING CRITERIA**

**SO MANY PAPERS**

She was very intimidating at first but ended up being my favorite professor I have ever taken. She is so kind and thoughtful. She's a tough cookie though.

Don't miss this class!

class or she will make sure that you are taken down a grade. It's a good course and I suggest everyone take her as a professor. Shes very smart and no nonsense.

7 people found this useful  
0 people did not find this useful

01/05/2016

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH2332

For Credit:

Yes

Attendance:

Mandatory

Textbook Used:

Yes

Would Take Again:

N/A

Grade Received:

C+

**TOUGH GRADER**

**RESPECTED**

**INSPIRATIONAL**

Absolutely amazing, one of the best English professors I've ever had! Professor Tudor was always willing to help, she really knows the books we read, she always went out of her way to make sure that you understand the material. Very knowledgeable and inspiring! Not an easy class--don't take if you don't really want to learn.

5 people found this useful  
0 people did not find this useful

01/05/2016

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

COMP1302

For Credit:

Yes

Attendance:

Mandatory

Textbook Used:

Yes

Would Take Again:

N/A

Grade Received:

C+

**GET READY TO READ**

**LOTS OF HOMEWORK**

**SKIP CLASS? YOU WON'T PASS.**

**GREAT PROFESSOR.**  
Very clear and organized and gives helpful examples. She does count attendance so don't skip!

Overall the class has been great! I would absolutely recommend!

Not for the lazy lol !!!  
Gotta work for the grades.

3 people found this useful  
0 people did not find this useful

01/05/2016

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGL2332

**For Credit:**

Yes

**Attendance:**

Mandatory

**Textbook Used:**

Yes

**Would Take Again:**

Yes

**Grade Received:**

B+

**PARTICIPATION MATTERS**

**INSPIRATIONAL**

Most amazing class ever!!! Loved the enthusiasm and insight of the professor--she's the best! Lots of discussion and fresh ideas.

6 people found this useful  
0 people did not find this useful

01/02/2016

**POOR**

1.5 OVERALL QUALITY

2.0 LEVEL OF DIFFICULTY

ENGL2332

**For Credit:**

Yes

**Attendance:**

Mandatory

**Textbook Used:**

No

**Would Take Again:**

N/A

**Grade Received:**

A+

**GET READY TO READ**

**LECTURE HEAVY**

**PARTICIPATION MATTERS**

I took this for my lit credit- It was a lot of reading, but not an unrealistic amount. If you like round table discussions then you will love this class. We had one every single day. You have a writing assignment at the beginning of class each day, but they're easy A's. For the final you answer two essay questions which she gives you in advance.

2 people found this useful  
10 people did not find this useful

find this useful  
find this useful

12/17/2015

**AWESOME**

**5.0** OVERALL QUALITY

**4.0** LEVEL OF DIFFICULTY

ENGL1301

**For Credit:**  
Yes  
**Attendance:**  
Mandatory

**Textbook Used:**  
Yes  
**Would Take Again:**  
Yes  
**Grade Received:**  
C+

**RESPECTED**

**SKIP CLASS? YOU WON'T PASS.**

I liked writing about current events and working in a team. Its a class u gotta keep up with or you will get left behind but the teacher has a syllabus with a calendar so it s your own fault if u don't follow it. Really strict with deadlines-- you've been warned lol!

8 people found this useful

1 person did not find this useful

12/14/2015

**AWESOME**

**5.0** OVERALL QUALITY

**4.0** LEVEL OF DIFFICULTY

ENGL1301

**For Credit:**  
Yes  
**Attendance:**  
Mandatory

**Textbook Used:**  
Yes  
**Would Take Again:**  
N/A  
**Grade Received:**  
B+

**SKIP CLASS? YOU WON'T PASS.**

**LOTS OF HOMEWORK**

**RESPECTED**

Great class if you want to learn. Lots of peer-reviewing and class discussion. If you aren't ready to work like you're in college, this class is not the one. If you are, you'll do ok.

3 people found this useful

0 people did not find this useful

12/10/2015

**AWESOME**

**5.0** OVERALL QUALITY

**2.0** LEVEL OF DIFFICULTY

ENGL1302

**For Credit:**  
Yes  
**Attendance:**  
Mandatory

**Textbook Used:**

**SO MANY PAPERS**

**PARTICIPATION MATTERS**

AMAZING PROFESSOR. SHE IS GREAT AT WHAT

15-cv-324 OPENING BRIEF - TUDOR - Vol. 4 - 030

YES  
Would Take Again:  
Yes  
Grade Received:  
C

**SHE DOES.** She teaches things you will need to know for college and in life. Take her class. you won't regret it at all. Whatever you do, don't miss a class.

7 people found this useful  
0 people did not find this useful

12/10/2015

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGL1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: B

**TOUGH GRADER**

**INSPIRATIONAL**

**RESPECTED**

I was lucky to have taken this class. Collin College is luck to have her. She gave us two weeks of sick days and I did not miss one day. Goal accomplished. She really cares about her students and it shows. Take this class.

Thank you professor!!!!!!

You are appreciated...

4 people found this useful  
0 people did not find this useful

12/10/2015

**AWESOME**

5.0 OVERALL QUALITY

2.0 LEVEL OF DIFFICULTY

ENGL1301

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: C+

**INSPIRATIONAL**

**GET READY TO READ**

**LOTS OF HOMEWORK**

She has a good heart and treats everyone the same no matter of who you are.

Her class is not very easy but t really makes you think of your own life situations and you are able to apply what you have

learned. Everyone should take this class. I really appreciate her work.

5 people found this useful

0 people did not find this useful

12/10/2015

**AWESOME**

5.0 OVERALL QUALITY

1.0 LEVEL OF DIFFICULTY

ENGL1301

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: C+

**SKIP CLASS? YOU WON'T PASS.**

**GET READY TO READ**

**RESPECTED**

This is an "easy" class if you show up and do the work . . . you know, like you are in COLLEGE lol.

Great professor and really innovative.

2 people found this useful

0 people did not find this useful

12/09/2015

**POOR**

2.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGL1301

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

**PARTICIPATION MATTERS**

**SO MANY PAPERS**

When she taught, she usually went straight from the book, and the ones that weren't were usually very weird questions. She doesn't really go into detail about what we learn and when when we get assignments, they are usually misguiding. Overall, if you stay on her good side, than you will do fine, but if not, she will fail you.

2 people found this useful

7 people did not find this useful

12/09/2015

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**4.0**

ENGLIHS1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: B

**SKIP CLASS? YOU WON'T PASS.**

**GET READY TO READ**

**PARTICIPATION MATTERS**

The class really gets you thinking about how the world is and how important it is to think and write clearly. **Very knowledgeable professor and very good at explaining things.** If you are ready to stop being closed-minded and think about the big picture and contribute and participate, this class is right.

6 people found this useful

1 person did not find this useful

12/08/2015

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**4.0**

ENGL1301

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: C+

**SKIP CLASS? YOU WON'T PASS.**

**INSPIRATIONAL**

**LOTS OF HOMEWORK**

**Not an easy class. But she is super smart.** Lots of work but rewarding as you gain needed knowledge. Weekly writing assignments and blogging required. Lots of writing and peer reviewing.

8 people found this useful

0 people did not find this useful

12/08/2015

**AWESOME**

ENGLIDH1302

**CLEAR GRADING CRITERIA**



**5.0**  
OVERALL QUALITY

Attendance:  
Mandatory

**RESPECTED**

**3.0**  
LEVEL OF DIFFICULTY

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: B+

Her teaching style is straightforward and clear. Just know that you have to do your part. Not a class for procrastinating.

4 people found this useful

1 person did not find this useful

12/07/2015

**POOR**  
OVERALL QUALITY

ENGL1302

**SKIP CLASS? YOU WON'T PASS.**

For Credit:Yes  
Attendance: Mandatory

**TOUGH GRADER**

**3.0**  
LEVEL OF DIFFICULTY

Textbook Used: No  
Would Take Again: N/A  
Grade Received: C

**GET READY TO READ**

Very unapproachable teacher. Very biased when grading towards students who have the same viewpoints. Seems uncomfortable around students. Not a hard class, but a teacher who grades things very bi-ased, so it's hard to succeed.

5 people found this useful

7 people did not find this useful

11/20/2015

**AWESOME**  
OVERALL QUALITY

ENGLISH1302

**SKIP CLASS? YOU WON'T PASS.**

For Credit:Yes  
Attendance: Mandatory

**RESPECTED**

**5.0**  
LEVEL OF DIFFICULTY

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B-

**GET READY TO READ**

Incredibly knowledgeable about . . . everything. If you keep up, you'll do fine. Lot's of writing and reading. Not for you if you are not a serious student.

10 people found this useful  
9 people did not find this useful

11/20/2015

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGL1301

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: B+

**GIVES GOOD FEEDBACK**

Demands college-level work. Tough but fair grad-er. really kind, really knowledgeable.

10 people found this useful  
4 people did not find this useful

11/19/2015

**AWESOME**

5.0 OVERALL QUALITY

2.0 LEVEL OF DIFFICULTY

ENGL1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: A-

**INSPIRATIONAL**

**LOTS OF HOMEWORK**

Composition is not a light subject, but she makes it awesome! She answers all questions and is really, really smart! Any negative reviews are the slackers in the back of the class who don't show up and don't do the work. Show up , do the work, and you'll be fine!

15 people found this useful  
7 people did not find this useful

11/19/2015

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGL11301

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: B+

**PARTICIPATION MATTERS**

**SKIP CLASS? YOU WON'T PASS.**

**TOUGH GRADER**

She's the most dedicated professor I've ever met. She really knows her stuff and wants you to succeed. Class isn't so easy...

and study if you want to pass. Don't plagiarize-- she'll catch you!

12 people found this useful

6 people did not find this useful

06/07/2015

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

1301

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B+

**GET READY TO READ**

**SKIP CLASS? YOU WON'T PASS.**

**CLEAR GRADING CRITERIA**

You have to work for your grade in this class, you can't procrastinate. There's a lot and I mean A LOT of reading. But honestly it's all worth it in the end, and if you do well you'll feel so incredibly proud. Nice professor too, as a person I really respect her.

15 people found this useful

6 people did not find this useful

06/07/2015

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: B

**CLEAR GRADING CRITERIA**

**PARTICIPATION MATTERS**

Great professor. Her attitude is always so positive and she teaches us not only the knowledge but also how to be a better person.

16 people found this useful

10 people did not find this useful

# AWESOME

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: B+

**SKIP CLASS? YOU WON'T PASS.**

**CLEAR GRADING CRITERIA**

She is very clear. She gives everyone a syllabus that you are supposed to follow. THIS IS COLLEGE NOT HIGH SCHOOL. Do the work and you will pass with no problem. Do the work! Ask her questions and she'll help you out.

11 people found this useful

7 people did not find this useful

05/18/2015

# AWESOME

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: N/A

**RESPECTED**

**PARTICIPATION MATTERS**

**GET READY TO READ**

Amazing teacher. Truly loves what she is teaching and she is very helpful when you ask questions.

If you have no real interest in the subject then there should be no reason for taking this class cause she does expect you to put effort.

17 people found this useful

4 people did not find this useful

05/18/2015

# AWESOME

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again:

**SKIP CLASS? YOU WON'T PASS.**

**CLEAR GRADING CRITERIA**

Grade Received: N/A

question she should be at a major four year school.

Unfortunately, some of the other kids in our class don't realize how amazing of a teacher she is and don't bother trying. If you really want to learn about writing, and actually want to be an adult for once, take this class.

11 people found this useful  
6 people did not find this useful

05/01/2015

AWESOME

5.0 OVERALL QUALITY

5.0 LEVEL OF DIFFICULTY

1301

For Credit: Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

LOTS OF HOMEWORK

TOUGH GRADER

PARTICIPATION MATTERS

A rewarding course if you want to learn something. if you want to skip class or zone out take someone else.

9 people found this useful  
1 person did not find this useful

05/01/2015

AWESOME

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH2332

For Credit: Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

LOTS OF HOMEWORK

PARTICIPATION MATTERS

TOUGH GRADER

Her class is not an easy A but a great teacher and breaks down a lot of the dense concepts very clearly. She's brilliant and she definitely made me a better reader and writer.

9 people found this useful  
4 people did not find this useful

04/30/2015

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: B+

**CLEAR GRADING CRITERIA**

**PARTICIPATION MATTERS**

She honestly just wants her students to do well. Her calendar is crystal clear telling us what is due and when for the whole semester. She gives feedback and responds quickly to emails. I highly recommend her, I learned a lot & enjoyed her class.

9 people found this useful

4 people did not find this useful

04/30/2015

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH2332

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: A-

**RESPECTED**

**PARTICIPATION MATTERS**

Very nice and helpful professor, highly recommend taking her classes. Lots of class discussions, I am considering taking more of her classes next year.

11 people found this useful

4 people did not find this useful

04/30/2015

**AWESOME**

5.0 OVERALL QUALITY

2.0 LEVEL OF DIFFICULTY

1302

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: N/A

**GET READY TO READ**

**PARTICIPATION MATTERS**

Professor Tudor is a great teacher. She is very en-

15-cv-324-OPENING BRIEF - TUDOR - Vol. 4 - 039

She is a very kind and understanding professor. Is open to all kinds of thoughts and ideas as long as you can support. Maybe too much reading.

11 people found this useful

3 people did not find this useful

04/29/2015

1302

**AVERAGE**

3.0 OVERALL QUALITY

For Credit:Yes  
Attendance: N/A

3.0 LEVEL OF DIFFICULTY

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

Honestly, she seems like a nice enough person, and the assignments are not hard. However, I'm annoyed that I go to classes just to watch videos. I have not learned one new thing in my time attending. It doesn't feel like an English class at all, but more like a semester-long tangent on her view of economics. Would not recommend to a friend.

4 people found this useful

4 people did not find this useful

04/23/2015

ENGLISH2332

**AWESOME**

5.0 OVERALL QUALITY

For Credit:Yes  
Attendance: N/A

2.0 LEVEL OF DIFFICULTY

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

**RESPECTED**

**INSPIRATIONAL**

**GET READY TO READ**

The class is challenging but will leave you enlightened!

11 people found this useful

3 people did not find this useful

04/23/2015

1301

**AWESOME**

OVERALL

For Credit:Yes

**CLEAR GRADING CRITERIA**

**15-cv-324 OPENING BRIEF - TUDOR - Vol. 4 - 040**

5.0 OVERALL QUALITY

Attendance: Mandatory

LOTS OF HOMEWORK

4.0 LEVEL OF DIFFICULTY

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: B

Teach like a crystal clear. You will get the grade you deserve. Not so much extra credit. Essays are hard. She's always ready to help. You will learn a lot from her. If you take her and really study, you'll do great. **Amazing professor :)**

9 people found this useful

3 people did not find this useful

04/23/2015

5.0 AWESOME OVERALL QUALITY

1302

SKIP CLASS? YOU WON'T PASS.

For Credit:Yes  
Attendance: N/A

CLEAR GRADING CRITERIA

4.0 LEVEL OF DIFFICULTY

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

PARTICIPATION MATTERS

**Dr Tudor is great.** She teaches very clearly! Learned more here than in all my high school classes. Take clear notes! **She is very helpful and super nice! She wants everyone to do their best!**

10 people found this useful

3 people did not find this useful

04/23/2015

5.0 AWESOME OVERALL QUALITY

1301

GIVES GOOD FEEDBACK

For Credit:Yes  
Attendance: Mandatory

PARTICIPATION MATTERS

3.0 LEVEL OF DIFFICULTY

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: A-

**Really nice lady. Wrote me a rec letter!** Go to class and take good notes, study the worksheets



ticipate in discussion, and  
you'll be fine.

9 people found this useful  
2 people did not find this useful

04/20/2015

**GOOD**

OVERALL QUALITY  
3.5

LEVEL OF DIFFICULTY  
3.0

ENGL1301

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: A

**GIVES GOOD FEEDBACK**

Very sweet lady. We had a Socratic seminar almost every class. She loves to give students freedom. Loves Greek tragedies, which was all we read. Two long papers and a lot of journal entries. She writes happy faces on good paper and frowny faces on bad ones. She's not your typical teacher, and her style is her own. Very nice, I would recommend her.

10 people found this useful  
3 people did not find this useful

02/01/2015

**AWESOME**

OVERALL QUALITY  
5.0

LEVEL OF DIFFICULTY  
3.0

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: N/A

**PARTICIPATION MATTERS**

**CLEAR GRADING CRITERIA**

A fabulous professor!  
People who are in her class shouldn't complain.

The work given is easy, it's just a lot of essays, and journal responses. You shouldn't complain if you don't want to do the work, that's why she makes it interesting giving you the option to

choose your own topics

for her given prompts.

5 people found this useful	3 people did not find this useful
--	--

01/15/2015

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH2332

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: A-

**GET READY TO READ**

**SKIP CLASS? YOU WON'T PASS.**

She's very interested in what she's teaching and teaches it all very well.

5 people found this useful	2 people did not find this useful
--	--

01/15/2015

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: B

**GIVES GOOD FEEDBACK**

**RESPECTED**

**CLEAR GRADING CRITERIA**

This teacher is very good because I really enjoyed coming to class and learned so much about myself and others. She is very clear regarding assignments and gives opportunities for extra credit. You need to attend lecture and participate.

8 people found this useful	2 people did not find this useful
--	--

01/15/2015

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: A-

**SKIP CLASS? YOU WON'T PASS.**

**PARTICIPATION MATTERS**

**CLEAR GRADING CRITERIA**

the best teacher I have had at SC. Wonderful class and an even better teacher. Very nice, clear in her expectations, gives extra credit, and gives you lots of opportunities to succeed. Amazing lady.

6 people found this useful  
0 people did not find this useful

01/15/2015

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: B

**AMAZING LECTURES**

**CLEAR GRADING CRITERIA**

Very nice instructor. Her teaching is very clear and she understands and helps with different learning styles of her students

3 people found this useful  
0 people did not find this useful

01/01/2015

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: B-

**PARTICIPATION MATTERS**

**SKIP CLASS? YOU WON'T PASS.**

This class was a lot of work, but it was worth it. She is very patient with students and encourages us to ask questions. She grades more for completion and effort, so as long as you do all the work and try you should do very well.

6 people found this useful  
0 people did not find this useful

12/26/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: A

**RESPECTED**

**INSPIRATIONAL**

**CLEAR GRADING CRITERIA**

anyone who writes any-  
thing negative about this  
teacher is dumb. proba-  
bly someone who failed  
or who is a spoiled brat. u  
won't find a teacher who  
tries harder for you, any-  
where. and i really liked  
the group work thing.

14  
people  
found  
this  
useful

2 people  
did not  
find this  
useful

12/26/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: N/A

**GET READY TO READ**

**PARTICIPATION MATTERS**

**TOUGH GRADER**

She's strict, and doesn't  
put up with any bull, but  
she really wants her stu-  
dents to become better  
writers and help them  
succeed!! Don't take this  
class if you expect a small  
work load. Great class!!

11  
people  
found  
this  
useful

1 person  
did not  
find this  
useful

12/25/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes

**GET READY TO READ**

**PARTICIPATION MATTERS**

i've always hated english,  
but this is a great class

Would take Again: Yes

Grade Received: B+

lish class i have ever enjoyed. class discussions are interesting and the assignments are all pretty easy. she does give out a lot of b's. I would def take her class again, one of my favorite professors!

7 people found this useful

0 people did not find this useful

12/25/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH2332

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

**INSPIRATIONAL**

**RESPECTED**

**PARTICIPATION MATTERS**

People say she's a tough grader, but I finished with an A. She's such a nice lady though. If you make it known that you're trying hard, she'll be understanding. Just don't slack on your papers and try to show up for class

6 people found this useful

0 people did not find this useful

12/25/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: B+

**SKIP CLASS? YOU WON'T PASS.**

**CLEAR GRADING CRITERIA**

Isn't the easiest professor in the world but as long as you actually work at what she suggests for you I can't imagine getting a poor grade. The topics are interesting enough however

that get rather tedious.

She knows her stuff and as long as you come to class wanting to have a little fun, youll have it. Very nice woman as well

3 people found this useful

0 people did not find this useful

12/25/2014

AWESOME

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes Attendance: N/A

Textbook Used: Yes Would Take Again: N/A Grade Received: N/A

CLEAR GRADING CRITERIA

INSPIRATIONAL

PARTICIPATION MATTERS

She's passionate about writing and reading, and she had us work in small groups for readings every so often. You do get homework and have to write on the readings, but

she's a great professor.

She challenges you to be your best! There's definitely a bit of reading and writing in her course, but it's worth it!

6 people found this useful

0 people did not find this useful

12/25/2014

AWESOME

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

1302

For Credit:Yes Attendance: N/A

Textbook Used: Yes Would Take Again: N/A Grade Received: N/A

GROUP PROJECTS

GET READY TO READ

PARTICIPATION MATTERS

I was never bored in her class. We read interesting articles and one awesome book. Everything

She is a tough grader but she wants the best for her students and will help them.

4 people found this useful

0 people did not find this useful

12/24/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: B+

**CARING**

**PARTICIPATION MATTERS**

This is not a teacher that you can easily manipulate, but if you want to learn English take her. She is very helpful but strict. This is not any easy class but you will challenge yourself and you will be a better student for it.

5 people found this useful

0 people did not find this useful

12/24/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: B

**GET READY TO READ**

**CLEAR GRADING CRITERIA**

**She's so cool.** She doesn't spoon feed her students, but she does introduce stimulating ideas that you might not have considered otherwise. You have to earn your grade, but you'll leave her class with a sense of accomplishment. **Great teacher!**

8 people found this useful

0 people did not find this useful

12/24/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: B

**GIVES GOOD FEEDBACK**

**PARTICIPATION MATTERS**

**CLEAR GRADING CRITERIA**

I took her my first semester. It is the most widely used college course I have taken. When I took the class I couldnt stand her, but now I see she was only pushing me to think outside of my normal views. Excellent teacher who deserves a big Thank You from me.

4 people found this useful

0 people did not find this useful

12/24/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: B-

**RESPECTED**

**CLEAR GRADING CRITERIA**

**SKIP CLASS? YOU WON'T PASS.**

I absolutely loved having Dr. Tudor for class. I learned a lot from her because she makes everything she teaches interesting. She actually cares about her students and knew us by name. I will personally return to her after I graduate to thank her for being AWESOME!

4 people found this useful

1 person did not find this useful



12/24/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: N/A

**INSPIRATIONAL**

**SKIP CLASS? YOU WON'T PASS.**

**GROUP PROJECTS**

She expects that you come to class prepared EVERY DAY. If you aren't willing to put in work, then don't take her classes. English 1302 with her was extremely writing intensive. It was the most work I've ever done but I learned A TON so I'm not complaining. She's EXTREMELY helpful (if you ask)

4 people found this useful

0 people did not find this useful

12/24/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: B

**LECTURE HEAVY**

**CLEAR GRADING CRITERIA**

**PARTICIPATION MATTERS**

It's a pretty hard class but if you show that you're interested she will help you. I got a D around midterm but she passed me with a B. She's very helpful if you wish to turn your great around. I recommend her if you truly want to learn something.

4 people found this useful

1 person did not find this useful

# AWESOME

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**3.0**

1302

For Credit: Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: A-

## CARING

### CLEAR GRADING CRITERIA

### GIVES GOOD FEEDBACK

Class is easy if you read the syllabus or check Blackboard or review the sample papers posted and discussed. One of the few English teachers that give you some freedom in your writing topics. She was always willing to answer questions or help out. Best class ever if you are a responsible student--but dont expect to show up and pass.

4 people found this useful

0 people did not find this useful

12/20/2014

# AWESOME

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**3.0**

ENGLISH2332

For Credit: Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

## RESPECTED

### GET READY TO READ

### PARTICIPATION MATTERS

She is incredibly smart, open-minded, willing to help, and interested in education. I can assure you that if you make an effort to know her and engage what she has to say, you will be handsomely rewarded with experience.

9 people found this useful

2 people did not find this useful

12/17/2014

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**3.0**

ENGLISH1301  
For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: B+

**CLEAR GRADING CRITERIA**

**PARTICIPATION MATTERS**

You have to work hard, but you will get ALOT out of it! She expects you to take her class seriously. But if you do, she is very kind and fair. She was well organized and very sweet. Shes not an easy A. But an A is possible.

11 people found this useful

2 people did not find this useful

12/17/2014

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**3.0**

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: N/A

**PARTICIPATION MATTERS**

**CLEAR GRADING CRITERIA**

If you actually READ the assignments and participate in class you'll be fine. She really challenges you to understand what you're reading and she genuinely cares about her students.

10 people found this useful

1 person did not find this useful

12/05/2014

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**4.0**

ENGLISH1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: B-

**PARTICIPATION MATTERS**

**GET READY TO READ**

She is a very good teacher. Highly recommended if you are serious about learning.

than just getting easy grades. She does push you to the max and encourage you to learn; do not expect to get easy As if you do not prove her that you deserve it. I learned a lot from her in just a class.

13 people found this useful

1 person did not find this useful

12/04/2014

**AWESOME**

5.0 OVERALL QUALITY

1.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: B+

**CARING**

**INSPIRATIONAL**

She explains everything that you need to know and gives you great examples to understand the material! Very educated teacher and loves what she does. Like any other course you have to study and put your effort to pass the class.

13 people found this useful

1 person did not find this useful

12/02/2014

**AWESOME**

5.0 OVERALL QUALITY

2.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: C+

**CLEAR GRADING CRITERIA**

**RESPECTED**

**AMAZING LECTURES**

she's a great teacher. there is a good deal of reading and writing in this class, so don't take it if you aren't prepared to read and write three essays, journals, and a term

paper.

11 people found this useful

1 person did not find this useful

12/02/2014

**AWESOME**

5.0 OVERALL QUALITY

2.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B+

**INSPIRATIONAL**

**RESPECTED**

**AMAZING LECTURES**

Dr Tudor is an enlightening and enriching teacher. More than a teacher, she is a mentor. She will help any student that needs help and seek it. English requires good grammar and structure knowledge. As long as you have those, you will be able to do well in her class. More-over, she is so inspiring. She motivates students.

14 people found this useful

1 person did not find this useful

12/02/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: N/A

**RESPECTED**

**INSPIRATIONAL**

The class was interesting. She will help you if you ask. YOU must ask her if you don't understand anything. It was hard for me. But she's a great teacher. Have to read a lot and really understand what you're reading (not just the superficial meaning).

11 people found this useful

0 people did not find this useful

R. Daniel Todd, Jr., College - R. Daniel Todd, Jr.,  
THIS IS A PUBLIC DOCUMENT  
useful

12/02/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: N/A

**RESPECTED**

**CLEAR GRADING CRITERIA**

**INSPIRATIONAL**

Professor Tudor's class is a very powerful English class because the class is not just make you, a strong writer, but it make you become a better person in term of understand and gaining the knowledge about the truth of our culture and the environment! She is the best English teacher in SCC! Take her and it will change your life!!

11 people found this useful

1 person did not find this useful

12/02/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: A-

**CARING**

**GIVES GOOD FEEDBACK**

Extremely intelligent, extremely helpful, knows what she's teaching. As long as you read the texts, you should do well in her class. She gave me insight on the real world througj the text I wouldn't have thought about if she didn't bring it up, making me a better student and person.

9 people found this useful

1 person did not find this useful

12/02/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: A-

**INSPIRATIONAL**

**CLEAR GRADING CRITERIA**

**CARING**

Prof Tudor allows the class to fuel the discussions, assigns group projects to have students teach each other, and only assigns a few essays and a journal. This can be AWESOME if you are a mature student, or it can be miserable if you were expecting a high-school style english class

16 people found this useful

2 people did not find this useful

12/02/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: A-

**GIVES GOOD FEEDBACK**

**CLEAR GRADING CRITERIA**

**Awesome teacher!** Always answered questions, always organized, expectations were clear. You can tell she loves what she does. I would recommend her to anyone!

10 people found this useful

2 people did not find this useful

12/02/2014

**AWESOME**

5.0 OVERALL QUALITY

2.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again:

**CLEAR GRADING CRITERIA**

**PARTICIPATION MATTERS**

**RESPECTED**

15-cv-324 OPENING BRIEF - TUDOR - Vol. 4 - 056

Grade Received: N/A

Great Instructor, great class. I learned so much about writing and myself. Take this class!

10 people found this useful

1 person did not find this useful

12/02/2014

AWESOME

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

CARING

CLEAR GRADING CRITERIA

INSPIRATIONAL

Dr. Tudor is a wonderful professor as well as a wonderful person. Her students are the reason she teaches. She has a lot of experience and is very knowledgeable about her subject. I highly recommend her!!! She really helps her students and wants them to succeed.

10 people found this useful

1 person did not find this useful

12/02/2014

AWESOME

5.0 OVERALL QUALITY

2.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B+

INSPIRATIONAL

GET READY TO READ

PARTICIPATION MATTERS

Absolutely my favorite teacher. I have learned and applied more from her class than any other. The course is tough, I did a lot of work for the grade, but I learned a ton as well. If your willing to do a little work, take off



15 people found this useful  
1 person did not find this useful

12/02/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: B+

**RESPECTED**

**CLEAR GRADING CRITERIA**

**Dr. Tudor is awesome!!**

She made me interested in things I never thought about. She's quite brilliant. She does have her opinions but she listens and replies to student's input and opinions, too. It makes the discussions pretty amazing. I wish I had tried harder in the beginning of the semester though.

11 people found this useful  
1 person did not find this useful

11/23/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B+

**GET READY TO READ**

**PARTICIPATION MATTERS**

**SKIP CLASS? YOU WON'T PASS.**

**Probably the best writing**

**class i've ever had.** She gets you thinking about society and really seems to have a passion in her work. Only thing is she expects a lot out of you. I suggest this class.

12 people found this useful  
1 person did not find this useful

11/21/2014

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**3.0**

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: N/A

**GET READY TO READ**

**CLEAR GRADING CRITERIA**

**Great class!** She can be intimidating at first but overall was a great professor. Was extremely helpful and clear on how she wanted the papers done. The topics themselves weren't so easy. Probably the only class I enjoyed going to this semester.

17 people found this useful

1 person did not find this useful

11/21/2014

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**4.0**

ENGLISH1302

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B+

**CLEAR GRADING CRITERIA**

**PARTICIPATION MATTERS**

**RESPECTED**

If you are in college to actually learn something then this is the professor for you. Her class is challenging and totally worth it.

9 people found this useful

1 person did not find this useful

11/17/2014

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**4.0**

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

**CLEAR GRADING CRITERIA**

**RESPECTED**

**GET READY TO READ**

**One of the best teacher I have ever had.** the class

is not easy but if u really pay attention to her and work hard u will pass with no problem at all I got an A and English is my second language Totally recommend her if u wanna learn how to write not to get an easy A because u really have to earn it

16 people found this useful  
2 people did not find this useful

11/17/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGL1302

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: A-

**GIVES GOOD FEEDBACK**

**SKIP CLASS? YOU WON'T PASS.**

**CLEAR GRADING CRITERIA**

**INCREDIBLE PROFESSOR. You will leave each class inspired to right all the wrongs in this world. She will open you eyes to new things, and you will grow.**

14 people found this useful  
1 person did not find this useful

11/17/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGL1301

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: B+

**PARTICIPATION MATTERS**

**GET READY TO READ**

**GREAT TEACHER! She explains things very well and always tries to make your writing better.**

9 people found this useful  
1 person did not find this useful

11/17/2014

**AWESOME**

ENGLISH1302

**RESPECTED**

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**3.0**

For Credit: Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B+

**LOTS OF HOMEWORK**

**CLEAR GRADING CRITERIA**

The material is clear, the homework isn't too tough. Lessons are clear, and she clearly tells you what you need to do to get an A in an assignment. There's homework every week, but it's not overwhelming. You also to revise and rewrite your work a lot.

15 people found this useful

1 person did not find this useful

11/17/2014

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**4.0**

ENGLISH1302

For Credit: Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: N/A

**SKIP CLASS? YOU WON'T PASS.**

**CLEAR GRADING CRITERIA**

Dr Tudor is a wonderful teacher who really knows her stuff. She is a hard grader, especially on her essays. It's REALLY hard to get an A in her class; however, not impossible if you really do try, do the essay rewrites. This class is definitely not an "easy A", but if you want to learn something

16 people found this useful

2 people did not find this useful

11/17/2014

**AWESOME**

OVERALL QUALITY  
**5.0**

ENGLISH1301

For Credit: Yes  
Attendance: N/A

**CLEAR GRADING CRITERIA**

**GET READY TO READ**

15-cv-324 OPENING BRIEF - TUDOR - Vol. 4 - 061

2.0 LEVEL OF DIFFICULTY

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

**GIVES GOOD FEEDBACK**

Very dedicated teacher, you will learn a lot. Dont slack off and be lazy. She's dedicated and wants the best for her students. She does grade strictly and her essays are the hardest to get good grades on. Great teacher, learnt soo much. Highly recommended.

17 people found this useful  
1 person did not find this useful

11/14/2014

AWESOME

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH2332

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: A-

**GET READY TO READ**

**PARTICIPATION MATTERS**

**INSPIRATIONAL**

this class was awesome. she is very passionate about what she does and makes the class very interesting. she is also interested in everyone's point of view. ya need to read and come to class every day if you want to do well.

12 people found this useful  
1 person did not find this useful

11/14/2014

AWESOME

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: A

**SKIP CLASS? YOU WON'T PASS.**

**CLEAR GRADING CRITERIA**

You will work hard. You will read a lot. You will be

employed at the Stackers in the class. But Dr. Tudor makes everything worthwhile. There are few professors who really are interested in student's learning. She is one of them.

16 people found this useful

1 person did not find this useful

11/14/2014

**AWESOME**

5.0 OVERALL QUALITY

2.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: A-

**PARTICIPATION MATTERS**

**INSPIRATIONAL**

I adore this woman. She is not an easy person to take by any means, but if you want to learn then she is perfect for you.

6 people found this useful

2 people did not find this useful

11/14/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

**RESPECTED**

**GET READY TO READ**

She definitely cares about her students. She isn't easy though, if you don't listen and really work then you'll have a hard time. I just made sure to have all assignments done.

16 people found this useful

1 person did not find this useful

11/14/2014

**AWESOME**

5.0 OVERALL QUALITY

ENGLISH1302

For Credit:Yes  
Attendance:

**CARING**

**CLEAR GRADING CRITERIA**

2.0 LEVEL OF DIFFICULTY

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: A-

She is sooo helpful and really interesting. Just MAKE SURE that you turn in your work!! you will make an A if you just do your work!!!!. She grades hard on papers but helps you learn what you did wrong. She is a really GREAT professor

13 people found this useful  
1 person did not find this useful

11/13/2014

AWESOME OVERALL QUALITY 5.0

4.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: B+

SKIP CLASS? YOU WON'T PASS.

She's always super prepared for class. Her expectations are 100% clear and assignments are never a surprise. She was born to teach and she really wants her students to succeed!

9 people found this useful  
1 person did not find this useful

11/13/2014

AWESOME OVERALL QUALITY 5.0

4.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

AMAZING LECTURES

CLEAR GRADING CRITERIA

PARTICIPATION MATTERS

Very well organized, helpful, and clear. I don't get why anyone would fail. Grades are fair. She always gives out examples. Must learn about grammar and MLA. I highly rec-

again if I could.

13 people found this useful

1 person did not find this useful

11/13/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: A-

**GET READY TO READ**

**CLEAR GRADING CRITERIA**

She is a good teacher and person. She is fair in her marking, although a little tough. You NEED to keep up on work in her class. Falling behind is a down hill slope to failing with her. I wouldwill continue taking her classes. Very good teacher.

11 people found this useful

0 people did not find this useful

11/13/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: B

**CLEAR GRADING CRITERIA**

**RESPECTED**

At first I didn't like her, but then I got to love her! She is absolutely amazing! She's a super good teacher and explains the stuff well! Sometimes she can come off as impatient, though she's not actually...

14 people found this useful

1 person did not find this useful

11/13/2014

**AWESOME**

5.0 OVERALL QUALITY

ENGLISH1302

For Credit:Yes  
Attendance:

**AMAZING LECTURES**

**INSPIRATIONAL**

15-cv-324 OPENING BRIEF - TUDOR - Vol. 4 - 065



3.0 LEVEL OF DIFFICULTY

Attendance: Mandatory  
Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B+

PARTICIPATION MATTERS

She is a great teacher & wants the very best for her students! She makes people feel comfortable participating in the class, and makes sure that everyone DOES participate. Class is never boring with her, and as long as you're there and trying your best, she'll encourage you to speak and you'll do great!

15 people found this useful

1 person did not find this useful

11/13/2014

AWESOME

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: A-

CLEAR GRADING CRITERIA

INSPIRATIONAL

To the point, witty and determined to teach you what you need to know. Dr Tudor is a good prof, but be prepared to work hard. She does not take kindly to slacking. If you attend all classes and work steadily your writing will improve and you should do well. I really liked Dr Tudor's teaching style.

14 people found this useful

1 person did not find this useful

11/12/2014

AWESOME

OVERALL

ENGLISH1302

For Credit:Yes

PARTICIPATION MATTERS

15-cv-324 OPENING BRIEF - TUDOR - Vol. 4 - 066

3.0 LEVEL OF DIFFICULTY

Attendance: Mandatory  
Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B

**CRITERIA**  
One of the best professor I've ever had, hands down! Her classes are interesting and you just can't help but want to go. As long as you do your work, you'll be all set. I recommend having her as a professor!

12 people found this useful  
1 person did not find this useful

11/12/2014

AWESOME

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH2332

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: A

**PARTICIPATION MATTERS**

**GET READY TO READ**

Great teacher, but this class is not for students who are trying to slide by without doing the work. Come to class prepared, do your homework, and participate in class discussions and you will do well. I thoroughly enjoyed her class!

16 people found this useful  
1 person did not find this useful

11/12/2014

AWESOME

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

**GET READY TO READ**

**INSPIRATIONAL**

This is by far one of the best teachers. Just go to class and read and do your work. I didn't like her at first I wanted to drop the class the first

was amazed how much my writing skills improved. Great Professor!

11 people found this useful

1 person did not find this useful

11/12/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: N/A

**RESPECTED**

She creates excellent in class discussions between other classmates and is always working on getting minds going. She makes you work hard, but she's great

13 people found this useful

1 person did not find this useful

11/10/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGL1302

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: B

**CLEAR GRADING CRITERIA**

**GET READY TO READ**

She loves what she does. Went into the class nervous, she required too much. I got scared was about to drop but i stayed in the course and im happy i did

14 people found this useful

1 person did not find this useful

11/10/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH2332

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

**RESPECTED**

**INSPIRATIONAL**

**GET READY TO READ**

She is diligent and very dedicated to her work. Her class has taught me

how to work well with others and become introspective with myself.

11 people found this useful  
1 person did not find this useful

11/10/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLIDH1302

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: B+

**RESPECTED**

**GET READY TO READ**

Very interesting class. Is clear about what she wants and expects from you. Heavy textbook use and attending class is a must.

8 people found this useful  
0 people did not find this useful

11/10/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B

**PARTICIPATION MATTERS**

**RESPECTED**

**CLEAR GRADING CRITERIA**

This teacher has a no non-sense teaching style, keep your listening ears sharp. Wonderful methods for getting to know the other students were incorporated. Be on time, show up, do the details of the assignments and you should be okay.

16 people found this useful  
1 person did not find this useful

11/10/2014

**AWESOME**

5.0 OVERALL QUALITY

ENGLISH1302

For Credit:Yes  
Attendance:

**INSPIRATIONAL**

**CLEAR GRADING CRITERIA**

**3.0** LEVEL OF DIFFICULTY

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: A-

Show up to every class on time and keep engaged in the class discussions. Actually put effort into the class and you'll do well.

9 people found this useful  
0 people did not find this useful

11/10/2014

**AWESOME**  
OVERALL QUALITY  
**5.0**

ENGLISH1302  
For Credit:Yes  
Attendance: Mandatory

**INSPIRATIONAL**  
**SKIP CLASS? YOU WON'T PASS.**

**4.0** LEVEL OF DIFFICULTY

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B+

**CLEAR GRADING CRITERIA**

great professor grades fairly and great controversial discussions

9 people found this useful  
1 person did not find this useful

11/10/2014

**AWESOME**  
OVERALL QUALITY  
**5.0**

1302  
For Credit:Yes  
Attendance: Mandatory

**CLEAR GRADING CRITERIA**  
**RESPECTED**  
**GIVES GOOD FEEDBACK**

**3.0** LEVEL OF DIFFICULTY

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B+

One of the best professors I ever had. She is very serious and gives you work but at the same time her classes are fun and enjoyable! she is just great!

11 people found this useful  
1 person did not find this useful

10/31/2014

**AWESOME**  
OVERALL QUALITY  
**5.0**

ENGLIHS1302  
For Credit:Yes  
Attendance: Mandatory

**PARTICIPATION MATTERS**  
**RESPECTED**

4.0 LEVEL OF DIFFICULTY

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B+

Don't expect an easy A, but you will get a lot out of this class if you're willing to work and do the reading. Her lectures are interesting and she's really good at getting students involved and comfortable discussing the reading.

15 people found this useful

1 person did not find this useful

10/31/2014

AWESOME

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: A-

PARTICIPATION MATTERS

TOUGH GRADER

An extremely hard grader; I questioned myself a lot after taking her class. But, she improved my writing more than any other professor. I took her for a different class a second time.

8 people found this useful

0 people did not find this useful

10/31/2014

AWESOME

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

PARTICIPATION MATTERS

CLEAR GRADING CRITERIA

Class is definitely not an easy A but it's possible to get one. Must do the work!

4 people found this useful

0 people did not find this useful

10/30/2014

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**3.0**

ENGLISH1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: A-

**PARTICIPATION MATTERS**

**SKIP CLASS? YOU WON'T PASS.**

She'll teach you whatever you're willing to learn.

She won't let you just fly by in class without learning something. Take her or risk not knowing how to write a great paper for the rest of your life.

15 people found this useful

0 people did not find this useful

10/30/2014

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**4.0**

ENGLISH2332

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: B+

She allows for great conversation. I hated writing before but she made it a bearable (if not an enjoyable) experience. Great Teacher!

11 people found this useful

1 person did not find this useful

10/28/2014

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**3.0**

ENGLISH1302

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: N/A

**CLEAR GRADING CRITERIA**

**GET READY TO READ**

Excellent teacher -- gives very clear directions, replies to inquiries quickly and with tact. She expects you to work for your grade, but I never saw it as a chore. If you give the course effort, she will grade fairly and give you wonderful feedback.

Very passionate teacher

her work, an I would recommend her to anyone.

14 people found this useful

1 person did not find this useful

10/28/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

**GET READY TO READ**

**CLEAR GRADING CRITERIA**

**TOUGH GRADER**

She legitimately knows what she is talking about, and teaches it well. Although she won't go easy on you when it comes to grading, and expects you to know the material.

Even so, I would love to have her as a teacher again.

12 people found this useful

1 person did not find this useful

10/28/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

**SKIP CLASS? YOU WON'T PASS.**

**PARTICIPATION MATTERS**

**CLEAR GRADING CRITERIA**

Caring but also very stern. There is no room to slack off but ample opportunity to receive help. She makes the subject interesting. The papers are not graded easily but if you make the effort, and revise often, you will not fail.



6 people found this useful  
0 people did not find this useful

10/23/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: A-

**RESPECTED**

**PARTICIPATION MATTERS**

**SKIP CLASS? YOU WON'T PASS.**

Professor is not an 'easy A' teacher. you will have to work very hard in this class, however, it is not impossible to get an A. I kept up with the reading and payed attention to her lectures--as any student should do.

6 people found this useful

0 people did not find this useful

10/23/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: N/A

**TOUGH GRADER**

**GET READY TO READ**

**CLEAR GRADING CRITERIA**

She'll treat you like a grown up .

10 people found this useful

2 people did not find this useful

10/21/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: N/A

**PARTICIPATION MATTERS**

**GET READY TO READ**

I wouldn't consider her an easy teacher. But she explains everything and gives you examples on Blackboard.

5

6 people found this useful  
0 people did not find this useful

10/21/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B+

**CLEAR GRADING CRITERIA**

**TOUGH GRADER**

I missed so much in high school. I wish I had taken learning seriously, especially Reading grammar.

This professor fills many gaps within a short time.

6 people found this useful

0 people did not find this useful

10/20/2014

**AWESOME**

5.0 OVERALL QUALITY

1.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

**CLEAR GRADING CRITERIA**

**PARTICIPATION MATTERS**

A very good professor.

She is very clear in her requirements and sticks to them. She is very approachable if you have a clear question or concern. I would recommend her.

7 people found this useful

0 people did not find this useful

10/20/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

**PARTICIPATION MATTERS**

**GET READY TO READ**

An AWESOME english professor. I definitely improved my writing while in her class - I would recommend it to anyone.

16 people found this useful  
1 person did not find this useful

10/20/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: N/A

**CLEAR GRADING CRITERIA**

A really cool teacher who seems very interested in the essay topics assigned. She is extremely helpful and clear. The class is fun and the discussions are entertaining. I greatly recommend this class to anyone. She is an awesome professor.

16 people found this useful

1 person did not find this useful

10/19/2014

**AWESOME**

5.0 OVERALL QUALITY

2.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: B-

**PARTICIPATION MATTERS**

**CLEAR GRADING CRITERIA**

She is an excellent teacher, you will pass as long as you show up & keep up with the work.

11 people found this useful

1 person did not find this useful

10/19/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

**RESPECTED**

**GET READY TO READ**

**TOUGH GRADER**

She is an awesome teacher! I really recommend taking this class. There are extra credits and easy group work. She made class enjoyable.

8 people found this useful  
0 people did not find this useful

10/19/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: B+

**PARTICIPATION MATTERS**

**CLEAR GRADING CRITERIA**

**Great professor!** Not an easy A class though so must put in some effort. Interesting class and learned some new things

7 people found this useful  
0 people did not find this useful

10/17/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
Yes  
Grade Received: B-

**CLEAR GRADING CRITERIA**

**Superb, very interactive and knowledgeable.**

10 people found this useful  
1 person did not find this useful

10/17/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: B+

**GET READY TO READ**

**SKIP CLASS? YOU WON'T PASS.**

**PARTICIPATION MATTERS**

I loved this course. I think Mythology is something that everyone should know. The books she uses are really really good. As long as you explain your opinion and back up any facts you'll get a good grade. Do your HW

13 people found this useful  
0 people did not find this useful

10/17/2014

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**4.0**

ENGLISH1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: B-

**GET READY TO READ**

**RESPECTED**

**INSPIRATIONAL**

She's a great teacher and she really knows her stuff.

The content is interesting and she's really helpful when explaining things. It's not a particularly easy class, you definitely have to put the time in to study, but you really do learn a lot.

15 people found this useful

0 people did not find this useful

10/17/2014

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**4.0**

ENGLISH1301

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: B+

**GET READY TO READ**

**PARTICIPATION MATTERS**

Good teacher and she's serious about her job. She loves what she's teaching and has the experience to go along with it.

10 people found this useful

0 people did not find this useful

10/17/2014

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**4.0**

ENGLISH1302

For Credit:Yes  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: C+

**TOUGH GRADER**

**RESPECTED**

**CLEAR GRADING CRITERIA**

Very easy to understand, very helpful, and highly educated.

4 people found this useful  
0 people did not find this useful

10/16/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: B

**CLEAR GRADING CRITERIA**

**GET READY TO READ**

amazing professor; her lectures are thorough and if you do the work, you will be absolutely fine in the class. Make sure you go to class though,

6 people found this useful  
0 people did not find this useful

10/16/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B

**SKIP CLASS? YOU WON'T PASS.**

**PARTICIPATION MATTERS**

**TOUGH GRADER**

I really enjoyed taking this class with her because she is such a great professor. She knows how to creates a challenge in how to apply it to your own writing while also providing the structure that is necessary for successful writing.

16 people found this useful  
0 people did not find this useful

10/16/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again:

**CLEAR GRADING CRITERIA**

**TOUGH GRADER**

**GET READY TO READ**

Grade Received: N/A

There are several assignments throughout the semester, weekly Blogs, and group assignments; you communicate with your group through the bloigs, and exams. The exam can be pretty tough, so be sure to study. She can be a strict grader on the assignments, so cite your sources properly.

15 people found this useful

1 person did not find this useful

10/16/2014

**AWESOME**

5.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: C

**RESPECTED**

**CLEAR GRADING CRITERIA**

**INSPIRATIONAL**

Finally learned MLA!

9 people found this useful

1 person did not find this useful

10/16/2014

**AWESOME**

5.0 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGLISH1301

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

**CLEAR GRADING CRITERIA**

**RESPECTED**

**PARTICIPATION MATTERS**

**Wonderful teacher.** Did not like english before I took her class. She made english fun and I beilve I learned to write better. That is the point right to learn.

7 people found this useful

0 people did not find this useful

10/16/2014

**AWESOME**

**5.0** OVERALL QUALITY

**4.0** LEVEL OF DIFFICULTY

1302  
For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: N/A

**CLEAR GRADING CRITERIA**

**RESPECTED**

take this class if you want to learn

5 people found this useful  
0 people did not find this useful

10/16/2014

**AWESOME**

**5.0** OVERALL QUALITY

**4.0** LEVEL OF DIFFICULTY

1302

For Credit:Yes  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: A-

**RESPECTED**

**CLEAR GRADING CRITERIA**

well-liked by students who want to learn

5 people found this useful  
0 people did not find this useful

10/16/2014

**AWESOME**

**5.0** OVERALL QUALITY

**4.0** LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

**AMAZING LECTURES**

**CLEAR GRADING CRITERIA**

Really good class talks.

9 people found this useful  
1 person did not find this useful

10/16/2014

**AWESOME**

**5.0** OVERALL QUALITY

**3.0** LEVEL OF DIFFICULTY

ENGLISH1302

For Credit:Yes  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: Yes  
Grade Received: N/A

**INSPIRATIONAL**

**RESPECTED**

You have to really not care to fail this class-- clear instruction and great feedback!

11 people found this useful  
1 person did not find this useful

10/16/2014

**AWESOME**

**5.0** OVERALL QUALITY

1302

For Credit:Yes  
Attendance: N/A

**GIVES GOOD FEEDBACK**

**CLEAR GRADING CRITERIA**



**2.0** LEVEL OF DIFFICULTY  
 Textbook Used: Yes  
 Would Take Again: N/A  
 Grade Received: N/A

Best ever!!!!!!

9 people found this useful

1 person did not find this useful

**10/14/2014**

**AWESOME**  
**5.0** OVERALL QUALITY

1302

For Credit:Yes  
 Attendance: N/A

**RESPECTED**

**CLEAR GRADING CRITERIA**

**GET READY TO READ**

**3.0** LEVEL OF DIFFICULTY

Textbook Used: Yes  
 Would Take Again: N/A  
 Grade Received: N/A

Great professor, great class. Not the easiest, don't get behind.

9 people found this useful

0 people did not find this useful

**10/14/2014**

**AWESOME**  
**4.5** OVERALL QUALITY

ENGLISH1302

For Credit:Yes  
 Attendance: Mandatory

**CLEAR GRADING CRITERIA**

**PARTICIPATION MATTERS**

**3.0** LEVEL OF DIFFICULTY

Textbook Used: Yes  
 Would Take Again: N/A  
 Grade Received: Not sure yet

Really great examples given of the assignments and you get to revise your papers before you turn them in for a grade.

12 people found this useful

0 people did not find this useful

**10/09/2014**

**AWFUL**  
**1.0** OVERALL QUALITY

COMP1302

For Credit:Yes  
 Attendance: Mandatory

**SKIP CLASS? YOU WON'T PASS.**

**TOUGH GRADER**

**5.0** LEVEL OF DIFFICULTY

Textbook Used: No  
 Would Take Again: N/A  
 Grade Received: WD

if you try to get help she won't help you. she doesn't tell you when your paper is do and gives you no example on how to write your essay. all of the plays are over

hard to pass this class.

4 people found this useful  
20 people did not find this useful

09/04/2014

**AWESOME**

OVERALL QUALITY  
5.0

LEVEL OF DIFFICULTY  
3.0

ENGLISH1302

For Credit:N/A  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: A+

Really like pffessor s pa-  
tience and the way she  
gives us examples of the  
assignments before they  
are due.

11 people found this useful  
1 person did not find this useful

09/02/2014

**AWESOME**

OVERALL QUALITY  
5.0

LEVEL OF DIFFICULTY  
3.0

ENGL1302

For Credit:N/A  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: B+

Dr. Tudor is one of the  
most caring and nice  
teachers i've had at col-  
lege or high school. I real-  
ly learned a lot in her  
class too.

13 people found this useful  
0 people did not find this useful

08/27/2014

**AWFUL**

OVERALL QUALITY  
1.0

LEVEL OF DIFFICULTY  
5.0

COMP1302

For Credit:N/A  
Attendance: N/A

Textbook Used: No  
Would Take Again:  
N/A  
Grade Received: N/A

if you like being clueless  
on what to write about,  
awkward silence on cir-  
cles and having a quite  
professor than this is the  
class for you.

16 people found this useful  
20 people did not find this useful

08/11/2014

**AWESOME**

OVERALL QUALITY  
5.0

LEVEL OF DIFFICULTY  
4.0

ENGL1301

For Credit:N/A  
Attendance: N/A

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: N/A

Looking forward to taking  
another course with Dr.  
Tudor!

12 people found this useful  
0 people did not find this useful

08/04/2014

**AWESOME**

5.0 OVERALL QUALITY

2.0 LEVEL OF DIFFICULTY

ENGL1302

For Credit:N/A  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: B

If you like open discussion, circling of chairs, working in groups, and getting your papers reviewed on the overhead projector--you will like this class. I honestly learned a lot, but it wasn't the easiest class I've taken.

16 people found this useful

0 people did not find this useful

07/31/2014

**AWESOME**

5.0 OVERALL QUALITY

2.0 LEVEL OF DIFFICULTY

ENGL1301

For Credit:N/A  
Attendance: N/A

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: N/A

i just signed up for comp 2 with this professor. what i liked best about the class--learning that english isn't just about writing, it's about thinking.

18 people found this useful

0 people did not find this useful

07/30/2014

**AWESOME**

5.0 OVERALL QUALITY

1.0 LEVEL OF DIFFICULTY

ENGL1301

For Credit:N/A  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: A

This course wasn't "easy" because work wasn't required, but easy because I always knew what was required and she always gave us examples and went over our work in class. It really helped that the professor was really kind too.

16 people found this useful

1 person did not find this useful

07/29/2014

ENGL1301

**POOR**

OVERALL QUALITY  
**1.5**

LEVEL OF DIFFICULTY  
**5.0**

For Credit: N/A  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: C

She's really unclear from the start of what she requires from her assignments, but is a huge fan of Greek tragedies. She wouldn't assist you with your mistakes but rather puts your work on the board for everyone to see.

7 people found this useful

18 people did not find this useful

07/07/2014

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**3.0**

1301

For Credit: N/A  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: A-

i think i took too many classes this summer, but this was my favorite cause it helped me be a better writer in my other classes.

10 people found this useful

1 person did not find this useful

07/03/2014

**AWESOME**

OVERALL QUALITY  
**5.0**

LEVEL OF DIFFICULTY  
**2.0**

1301

For Credit: N/A  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: B

The best thing about this professor is how well organized she is--everything is on the syllabus and posted on blackboard. If you don't get it, your just not trying.

17 people found this useful

1 person did not find this useful

06/17/2014

**AWESOME**

OVERALL QUALITY  
**4.5**

LEVEL OF DIFFICULTY  
**2.0**

ENGL1302

For Credit: N/A  
Attendance: Mandatory

Textbook Used: No  
Would Take Again: N/A

I found Dr. Tudor to be a very knowledgeable and interesting women. I really enjoyed taking her class! I took world litera-

ture. Be

about Greek mythology, specifically the odyssey, iliad, and the republic. Although we read 3 books, you are only required to write one major (8pg) paper. It's challenging but worth it! She's great!

14 people found this useful

1 person did not find this useful

05/12/2014

**AVERAGE**

3.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

ENGL1301

For Credit:N/A Attendance: N/A

Textbook Used: No Would Take Again: N/A Grade Received: N/A

Very great teacher! If you read the books or even sparknote the books and you will do good in this class. She is kind of shy, but overall shes good.

1 person found this useful

2 people did not find this useful

05/06/2014

**AWFUL**

1.0 OVERALL QUALITY

1.0 LEVEL OF DIFFICULTY

COMP1302

For Credit:N/A Attendance: N/A

Textbook Used: No Would Take Again: N/A Grade Received: N/A

She doesn't explain what we are supposed to write about and if you ask her for help she won't help you. All of her essays are over Greek mythology so you have to read all the books she requires you to read.

4 people found this useful

16 people did not find this useful

04/29/2014

**AWESOME**

5.0 OVERALL QUALITY

2.0 LEVEL OF DIFFICULTY

ENGL1302

For Credit:N/A Attendance: Mandatory

Textbook Used: Yes

my friend told me someone was hatin on dr tudor here the negative comments are totally unfair!!!

she's a nice person

15-cv-324 OPENING BRIEF - TUDOR - Vol. 4 - 086

Would Take Again: N/A  
Grade Received: N/A

9 people found this useful

1 person did not find this useful

01/16/2014

**AWESOME**

OVERALL QUALITY  
5.0

LEVEL OF DIFFICULTY  
2.0

ENGLISH1302

For Credit:N/A  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

One of the best classes I've had so far, and I've had some really good teachers.

8 people found this useful

0 people did not find this useful

01/15/2014

**AWESOME**

OVERALL QUALITY  
5.0

LEVEL OF DIFFICULTY  
3.0

ENGL1301

For Credit:N/A  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: A

Great class!!!!

9 people found this useful

2 people did not find this useful

12/18/2013

**AVERAGE**

OVERALL QUALITY  
2.5

LEVEL OF DIFFICULTY  
3.0

ENGL1301

For Credit:N/A  
Attendance: N/A

Textbook Used: No  
Would Take Again: N/A  
Grade Received: N/A

This class was okay. She is in love with greek drama, I suggest refreshing yourself with Sophocles, Euripides and Aeschylus before this course. As long as you stay up to date with blackboard assignments and the blogs you will be fine.

2 people found this useful

4 people did not find this useful

12/12/2013

**GOOD**

OVERALL QUALITY  
4.0

LEVEL OF DIFFICULTY  
2.0

ENGL1301

For Credit:N/A  
Attendance: Mandatory

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: A

It's a bit boring but do the work and you'll get what u deserve. Greek mythology is her thing throughout the year. Oedipus.....

9 people found this useful

0 people did not find this useful

12/04/2013

ENGLISH1301

**AWESOME**

OVERALL QUALITY  
**4.5**

LEVEL OF DIFFICULTY  
**2.0**

For Credit:N/A  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: A+

I actually enjoyed this course. You have to read the text if you want to pass which is greek mythology plays. It's not that difficult. She tries really hard to get the class engage but no one really wanted to. Overall she is a great professor but she can only do so much depending on the classes attitude. You do have to work for your grade.

14 people found this useful

0 people did not find this useful

11/07/2013

COMP1301

**AWFUL**

OVERALL QUALITY  
**1.0**

LEVEL OF DIFFICULTY  
**4.0**

For Credit:N/A  
Attendance:  
Mandatory

Textbook Used: Yes  
Would Take Again:  
N/A  
Grade Received: N/A

Class was boring, and so far gives little help with assignments, which are in abundance.

5 people found this useful

14 people did not find this useful

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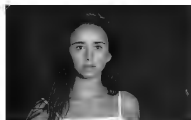
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Did You Know This Site Can TruthFinder

# Rachel Tudor

Professor in the English department  
at [Southeastern Oklahoma State University](#), Durant, OK

**ARE YOU RACHEL?**

**OVERALL  
QUALITY  
4.0**

## Top 20 Tags for this Professor

See how other students describe this professor.

CHOOSE YOUR TAGS

**WOULD  
TAKE  
AGAIN**

**N/A**

**LEVEL  
OF  
DIFFICULTY**



3.4

HOTNESS



### 5 Student Ratings

Start typing your comment...

CONTINUE YOUR

350 characters left

01/28/2014

**GOOD**

3.5 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

COMP1302

For Credit:

N/A

Attendance:

N/A

Textbook Used:

Yes

Would Take Again:

N/A

Grade Received:

N/A

she is a good teacher but makes us do read books that the other classes with different proffes-sors don't have to read.

the other professors don't have to read the three books we have to but she makes us read these books. I'm thinking that she's giving us more work than is required for this class.

9 people found this useful

2 people did not find this useful

12/26/2012

**AWESOME**

4.5 OVERALL QUALITY

4.0 LEVEL OF DIFFICULTY

ENGL2332

For Credit:

N/A

Attendance:

N/A

Textbook Used:

Yes

Would Take Again:

N/A

Grade Received:

N/A

I had Dr. Rachel Tudor for World Literature I course at Collin College, Texas in Spring 2012. I found the professor well-read, intelligent and good educator. If one likes to learn world literature in a critical-analytical-philosophical way she is the best.

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choice. Her assignments and exam are all challenging in a good way.

3 people found this useful  
2 people did not find this useful

06/17/2011

GOOD

4.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

PHIL2113

For Credit: N/A  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

Very informative woman! Opens her students up to a variety of world views and engages her students in class discussions.

3 people found this useful  
1 person did not find this useful

12/10/2010

GOOD

4.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

PHIL2113

For Credit: N/A  
Attendance: N/A

Textbook Used: Yes  
Would Take Again: N/A  
Grade Received: N/A

Dr. Tudor is an amazing teacher (had her for the Spring semester, late review). The class participation was excellent - I think it really helped the class understand concepts as we had class discussions on a daily basis. Dr. Tudor makes the class enjoyable and even though I was knowledgeable about the subject beforehand, I learned a lot!

4 people found this useful  
3 people did not find this useful

04/07/2010

GOOD

4.0 OVERALL QUALITY

3.0 LEVEL OF DIFFICULTY

PHIL2113

For Credit: N/A  
Attendance: N/A

Textbook Used: No  
Would Take Again: N/A

In Dr. Tudor's Introduction to Philosophy class, the entire class would be engaged and participate in discussions over the books we read. She knows what she is

Grade Received:

N/A

it. Liking philosophy will make the class easier. Although not an advocate of religion (seems anti-Christian at times), she is a fairly open-minded professor.

6 people found this useful

1 person did not find this useful

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# Exhibit 6



### **Peer Classroom Visitation**

Dr. R.J. Tudor

Hum 2113.3 Spring '06

9:30 class Tuesday April 11, 2006

by Randy Prus

I had the opportunity to visit Dr. Tudor's 9:30 Humanities class on Tuesday April 11, 2006. The class began with a ten-minute quiz on the first four books of the *Aeneid*. Dr. Tudor then proceeded to lead a discussion on the quiz as a way to explore the complexities of the text. From the particulars of specific moments in the text, Dr. Tudor and several students were able to make broader connections to the *Aeneid* as well as to an earlier text in the course Homer's *Odyssey*. Ultimate questions, central to a Humanities course, such as Fate *versus* Free Will, the concept of Justice, and the role and representation of women, were raised and situated within the differences of Greek and Roman culture. Students who chose to participate did so in an energetic and learned manner. Dr. Tudor is certainly knowledgeable in field and demonstrates the appropriate pedagogy towards the humanities. If I do have a concern--and it's minor--it has to do with the syllabus and the timing and tempo of the course. There seemed to be a gap of several weeks between the syllabus and the material covered, but I'm sure there were circumstances for this gap. Overall, based on a single visit, Dr. Tudor managed the class well and the material fit the course description and the purpose of general education.





February 11, 2007

To Whom It May Concern:

On December 6, 2006, I visited Professor Robert Tudor's Intro to Philosophy class. The class was devoted to Orwell's *1984* and followed a discussion format. By the end of the class period the great majority of students had volunteered comments on the issues raised, a very positive accomplishment, one that testifies to student engagement with the material, and one based on Dr. Tudor's designing a brief, generic writing assignment to be completed prior to class by each student. The two-fold assignment used regularly during the semester asks students to respond to two prompts: 1) "The most engaging idea in this section is ..." and 2) "This idea is important because ...". I think this is a wonderful way to motivate students and to generate their active, personal engagement. It leads well into successful discussion periods. Students were genuinely engaged in discussing *1984* as it related to their lives and to current social and political issues.

A follow-up discussion between Dr. Tudor and myself focused positively on the importance of developing students' critical thinking, the complexities of managing class discussions, on syllabus content involving grading policies and procedures, and on course text selection.

My visit to Dr. Tudor's class was a very positive one. I was especially impressed by his students' willingness to address the philosophical issues raised and also by their respect for one another's viewpoints.

Sincerely,

John Brett Mischo  
Professor and Chair



### **Peer Classroom Visitation**

Dr. Rachel Tudor

Phil 2113.1

Tuesday Feb. 10, 2009

by Randy Prus

I had the opportunity to visit Dr. Tudor's "Introduction to Philosophy" class and was quite impressed by the level of instruction and the energy in the classroom. The topic of the class was the last two books of Plato's *Republic*, with the central focus of class being "what is the practice of philosophy?" and "who is a philosopher?" Of the fifteen or so students present that day, at least half of them participated actively in the discussion. It was clear that Dr. Tudor knew the text thoroughly, but I was equally impressed by the students' ability to locate passages and to bring those passages into the discussion. They were equally adept at making connections between the ideas in the text and examples from contemporary culture, mostly film and politics. Because the class was focused on the end of the *Republic*, it seems clear that this level of investigation typifies the class as several of the references were to earlier chapters and earlier discussions from previous classes. In summary, Dr. Tudor does an excellent job of practicing philosophy among a group of fledgling philosophers.



# SOUTHEASTERN

A CENTURY OF BUILDING FUTURES

March 9, 2009


I visited Dr. Rachel Tudor's introduction to philosophy class on February 5, 2009. The class began with students separating into randomly selected groups to discuss democratic values in Pericles' Funeral Oration. The follow-up discussion engaged the entire class and synthesized the various groups' ideas with a student compiling a list on the whiteboard.

Dr. Tudor's teaching style is Socratic. It successfully led students to think dialectically. Student contributions to the discussion effectively linked the Pericles text to Plato's *Republic*, the major text under consideration, generating an analysis of two very different views of governance. Dr. Tudor managed the discussion very well, eliciting students' ideas where necessary and congratulating students when merited. Over all, students seemed to have read the material and to be familiar with it. Students were also able to connect the ancient texts to current political issues.

Group work can be extremely effective pedagogically and can also pose practical obstacles. Personally I think it's very commendable that Dr. Tudor takes advantage of such an active form of learning. Selecting groups randomly, as was done in this class, is a good practice. I would recommend that groups be seated further apart in the classroom so as not to physically blend one into another. Dr. Tudor might also want to prod the more silent groups during the discussion period.

Over all, I was impressed with the class session. Dr. Tudor's juxtaposition of the Pericles' speech and Plato's ideas on government was inspired and created fresh insights into an old topic. Plato's ideas are fascinating to me, and I was gratified to see that the majority of the class was so engaged in their thinking on these topics. These were intelligent and articulate students. Dr. Tudor's persona is pleasant, congenial, and collegial. She effectively brought the class discussion to a sense of closure that nonetheless provided students the impetus to continue thinking on their way out of and beyond the classroom.

Sincerely,



Dr. John Brett Mischo, Chair

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May 14, 2010

Dr. Rachel Tudor  
Assistant Professor  
Department of English, Humanities, and Languages  
Southeastern Oklahoma State University  
1405 N. Fourth Avenue, PMB 4036  
Durant, Oklahoma 74701-0609

RE: Peer evaluation

Dear Dr. Tudor:

Per your invitation, I visited your Humanities class (HUM 2113.1) at 8:00 on Monday morning, April 19 in Morrison 304. I am happy to provide you with the following observations concerning that class.

After you briefly introduced me to the class, I took a seat at the rear of the class and began my observation. Your students at that early hour were initially quite quiet and reserved; nevertheless they all appeared to be attentive and receptive. Following the plans on your syllabus, you announced that you were going to review for them "how to make a perfect PowerPoint presentation --or at least one that will earn a passing grade." The class and I appreciated the appended humorous comment.

It was clear that you were well prepared for the class as you demonstrated your familiarity with the technology to be used by the students in their own presentations. My original notes indicate a "solid, even inspirational, use of in-class technology" which is an assessment I am pleased to repeat here. In your demonstration, you included examples of model PowerPoint slides that you had prepared and contrasted them with PowerPoint slides that students had produced in earlier semesters. You also provided concrete guidelines for your students to use in their own presentations, i.e. strong recommendations that there be no more than seven lines on each slide; that each line have no more than seven words; and that the font be easily legible and not more nor less than 24 points in size.

As you gave technical instructions, you simultaneously took advantage of the time to engage your class in a review and discussion of the characters from Greek antiquity that appeared in your PowerPoint presentation: I noted slides and questions concerning Achilles, Hector, the Minotaur, Pandora, Odysseus, Erato, and Hypatia. You then demonstrated even further technological prowess by accessing YouTube to play a trailer from forthcoming feature film *Agora*, which is related to Roman-era Alexandria, Egypt.

After giving a ten-minute, open note, open text quiz that you had announced at the beginning of your presentation, your class divided itself easily into three working groups where they discussed and shared their plans among themselves for their imminent PowerPoint presentations. I noticed that you circulated among all three groups, pausing to check in on their progress, answer questions, and share humor. The interaction appeared comfortable, relaxed, and good-humored on all sides. At the end of

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SOUTHEASTERN OKLAHOMA STATE UNIVERSITY

the group-work time, you regained the attention of the class to remind them of their activities in class on the next two meetings for that week.

In all respects, I observed a class that was a model of good pedagogical practice: the instructor was knowledgeable, respectful, humorous, helpful, thoroughly prepared, and technologically proficient; the students were receptive, attentive, courteous, and engaged; and the class time was spent productively in three distinct but interrelated activities. I was especially impressed by the care taken to look ahead to the upcoming activities for the rest of the week. In short, it was an impressive display of teaching skill. My only recommendation, as I mentioned in our brief follow-up visit, would be to speak a bit louder. As you know, I am somewhat hard of hearing and I strained occasionally to understand your speech due to your soft-spoken personal style. I am aware, however, that this "problem" may have been mine alone, and that the students may have had no difficulty at all in hearing you.

Thank you for offering me the opportunity to observe your class. It was a thoroughly enjoyable experience and I congratulate you on a job extremely well done.

Sincerely,



F. Daniel Althoff  
Associate Professor

EVALUATION FORM FOR CLASSROOM VISIT

Class/section: English 1301

Date of Visit: October 31, 2012

Faculty Name: Dr. Rachel Tudor

Evaluator: Evaluate the instructor based on the four criteria listed below by describing your observations of their classroom presentation/activities conducted during your visit.

- Criterion 1. Preparation: the instructor provided examples to reinforce concepts, provided clear answers to students' questions, expanded upon the textbook;
- Criterion 2. Content: the instructor used appropriate materials, previewed upcoming course material, presented in a logical sequence;
- Criterion 3. Methodology: the instructor respected the students, presented enthusiastically, used variety of presentation methods, and moved from podium;
- Criterion 4. Student Involvement: the instructor solicited questions, comments and examples, provided opportunities for group or individual discussion on the material, and students participated in experiential activities.

1. The instructor was prepared for class.

Dr. Tudor was well prepared. She answered student questions with detailed answers. She also directed questions to the groups, especially when the group left holes in its argument.

2. The content of the class session was appropriate for achieving instructional goals.

The class centered on the Worksheet entitled "The 'Gainful Employment' Rule". Students learned about presenting/arguing from different perspectives and how to defend the position. Each group had to discuss the costs and benefits of its position.

3. The instructor effectively presented the material.

Dr. Tudor moved around the room, working with each group as they collaborated on their responses. She engaged the group leader when he or she was presenting. She also corrected any misconceptions or misinterpretation of the rule.

4. The students were appropriately involved in the learning process.

Students presented positions from a "stakeholders" point of view. The students represented a representative of the US Department of Education, a former student who had a positive experience at a for-profit college, a former student who had a negative experience at a for-profit university, and a for-profit college lobbyist. Students worked in groups to collaborate on responses. The groups presented their information to the entire class. At the end, students filled out the "Agreement Form" where they had to give information about the background, premises, possible solutions, and a solution on which all parties agree.

Evaluator's comments/recommendations: (Please use reverse side if additional space is needed)

I enjoyed seeing the students collaborate on the Worksheet!

Instructor's comments/response: (Please use reverse side if additional space is needed.)

SIGNATURES

CWID:

Instructor Signature: <i>Zachary Tudor</i>	Date <i>4/18/13</i>
Evaluator:	Date
Academic Dean: <i>M. J. ...</i>	Date <i>4/10/13</i>

Collin College

Classroom Observation Report

Faculty: Rachel Tudor  
Location: SCC, BB233

Class: ENGL2332.S03  
# Students Present: 15 + 1 late (2 min) + 2  
{4 min} + 1 {9 min} = 19

Date: 4/22/14  
Enrollment:

Evaluation Criteria

<b>Preparation</b>	The instructor provided a lesson plan and materials prior to the visit, began and ended class in a timely manner, and provided clear answers to students' questions
<b>Content</b>	The instructor used effective materials, provided examples to reinforce concepts, related material to previous lessons, previewed upcoming material, and expanded on the textbook material in a relevant manner
<b>Methodology</b>	The instructor respected the students, presented material enthusiastically and clearly, and used a variety of presentation methods, providing a learning environment conducive to learning
<b>Student Involvement</b>	The instructor solicited questions, comments, and examples; and provided opportunities for group or individual discussion of the material; all students participated in activities

1. Preparation

- Lesson plan not provided prior to class
- Arrived in class six minutes early, set up computer/projector
- Began class on time
- Ended class on time, remained after class to collect work and answer questions

2. Content

- Greeted students ("Good morning.") and collected student work
- Reviewed Plato's discussion of equal education and updated discussion by showing PBS video of Malala (10:02-10:12) – Relating contemporary issues to the same issues addressed in literature promotes student interest and understanding by pointing out the literature's relevance to students' lives
- Noted the inspirational nature of Malala and her message and encouraged students to read book – It may have been helpful to elaborate on the connection to Plato, including the benefits to individuals and to society.
- Distributed writing assignment to some students; others had assignment and had completed the writing
- At 10:14, asked students to assemble groups to discuss responses; three groups (6, 6, 7 students) were assembled
- Professor monitored group discussions, occasionally offering comments/direction and answering questions; responded to questions from group in back of room
- At 10:37 announced 5 more minutes of discussion
- At 10:40 asked students to "form a large circle"
- Prompted discussion of aristocracy and oligarchy; asked about the distinguishing features of various forms of government and associated aspects of personality types – This was a brief but engaging discussion
- Usually elaborated on student responses – related to current issues (e.g., paycheck loans) – class discussion was low-key, but clear and relevant
- Prompted discussion of Plato's view of democracy – noted equivalency of "absolute freedom" to anarchy
- Asked "What type of government do we have?" and asked students to relate to Plato's view – This discussion would have been more substantive had you insisted on examples/support of broad assertions.
- Asked, "What's the difference between a philosopher king and a tyrant?"
- After lull in discussion, asked students to report on discussion ("You had some really good discussion...")
- Student raises issue of "unnecessary appetite" (trait of democracy vs. oligarchy) – Again, you might want to challenge broad assertions beyond reference to commercial food/tobacco industries. Female student does offer example of Aldi' approach to retail.

- Asked, "What are the qualities of government you'd most like to see?"
- Asked, "How does this compare to Pericles' definition of democracy?" – Again, effective connection of concepts that promotes student understanding!
- Raised question "How can we be happy?"
- Asked for final responses
- Distributed handout and reminded students about assignment due on Tuesday
- Thanked students for contributions

3. Methodology

- Treated students respectfully
- Presented material clearly
- Praised students ("I heard some very interesting discussion..." "Yeah, absolutely..." "Yeah, that's exactly the way he presented it, right?")
- Usually responded directly and clearly to questions; in two cases (male next to door and female to immediate right of professor), professor didn't respond to students' contributions.
- Used video and handouts (assignment sheet)

4. Student Involvement

- Solicited questions, comments, and examples
- Provided opportunities for group and individual discussion of the material
- All students participated in activities; two students (female with laptop and Hispanic male with baseball cap) were not engaged in group discussion – female moved to a different group where she was engaged; male (blond) in back of room appeared to use phone


Evaluator's Comments/Recommendations

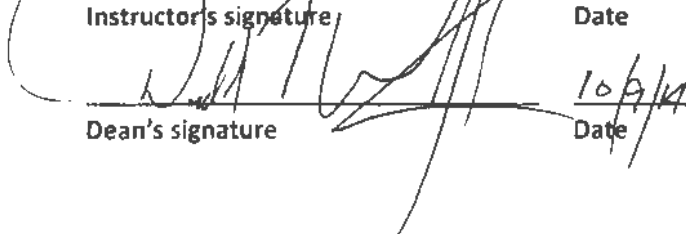
\* Related to students in friendly but professional manner. This group of students willingly participated in activities; even the Hispanic male listened although he didn't actively participate.


\* Very productive, engaging class discussion. At first, the discussion was a little strained—with frequent silence—but the discussion grew more engaging later. I feel, however, that some broad assertions should be questioned/challenged.

\* I enjoyed this class, especially the collaborative nature thereof and your ability to connect concepts.

Instructor's Comments/Responses

  
 Instructor's signature \_\_\_\_\_  
 Date 10/9/14

  
 Dean's signature \_\_\_\_\_  
 Date 10/9/14

  
 Evaluator's signature \_\_\_\_\_  
 Date 10/9/14



Collin College  
Classroom Observation Report

Faculty: Tudor, Rachel      Class: ENGL1302.S30      Date: 2/26/15, 8:30-9:45 AM  
Location: SCC, BB233      # Students Present: 20 + 1 (3 min late) + 1 (7 min) = 22      Enrollment: 24

Evaluation Criteria

<b>Preparation</b>	The instructor provided a lesson plan and materials prior to the visit, began and ended class in a timely manner, and provided clear answers to students' questions
<b>Content</b>	The instructor used effective materials, provided examples to reinforce concepts, related material to previous lessons, previewed upcoming material, and expanded on the textbook material in a relevant manner
<b>Methodology</b>	The instructor respected the students, presented material enthusiastically and clearly, and used a variety of presentation methods, providing a learning environment conducive to learning
<b>Student Involvement</b>	The instructor solicited questions, comments, and examples; and provided opportunities for group or individual discussion of the material; all students participated in activities

1. **Preparation**

- Arrived in class at 8:25, greeted students; set up computer
- Class was silent until lesson began – You might want to set up an activity that engages students prior to class but doesn't penalize those that arrive at 8:30. This activity could take the form of a question written on the board or projected on the screen as soon as you arrive; the question could take the form of a prewriting activity or a prompt for individual or corporate discussion. Alternatively, or in addition, you may want to simply chat with students as a means of strengthening relationships.
- Began class on time
- Ended class at 9:46

2. **Content**

- Greeted students with "Good morning"
- Distributed a handout, a guide to analyzing visual arguments (see below)
- Read/Reviewed handout with class, expanding and clarifying concepts
- Displayed video Wealth Inequality America (Think Reality)
- Opened class discussion of the main point of video, comparison to own understandings, visual strategies used in the videos, etc. - This is a stimulating video, very effective, and the subsequent discussion was engaging, albeit brief.
- Displayed [www.inequality.is](http://www.inequality.is) video, also about wealth distribution in US
- Asked students: "What is this about?...Was it more compelling?... – Pointed out "less abstract," relative effectiveness - The discussions following viewings of the videos were substantive and engaging.
- Female student in front row noted the second video provided suggestions for remedies compared to simple suggestion in first video of awareness; no response followed by silence – This was a useful observation that should have been followed by a verbal affirmation (e.g., Good idea.) rather than simply a head nod.
- Prompted additional comments – Silence – It would have been appropriate to note the complexity and engagement of analyzing visual argument as a lead into the next activity.
- Distributed second handout For Class Discussion (see below – from textbook) – The videos were great choices of visual rhetoric, and the discussion was effective, engaging. I was hoping for more.
- Reviewed handout with class, noting that it will serve as basis for activity to follow, analysis of graphic (Earthjustice) in textbook
- At 8:51, asked students to form teams and complete analysis
- At 8:52, students assembled groups and began task; responded to question about folders; monitored group work
- Students worked quietly as individuals until 9:00, when one student began discussion with group members

- Continued to monitor group work, responding to questions, offering crayons for last task, providing ideas, prompting timely completion – You responded clearly and directly to student inquiries.
  - At 9:14, announced five minutes left
  - Male student remarked “I think she has us do all these images so she can laugh...” – Your smile was appropriate. A lighthearted comment would have been appropriate, might have moved the group closer to completion, and would have strengthened relationships. It was an opportunity to remind students of the purpose of the task, perhaps in a joking manner.
  - At 9:20, announced that an additional 5 minutes would be allowed for completion of task
  - At 9:22, directed students to get feedback
  - At 9:26, directed students to exchange work and provide constructive feedback using first handout
  - Continued to monitor group/pair work
  - At 9:32, asked students to arrange desks in one large circle for class discussion
  - Asked students to share drawings in round-robin manner, analyze graphic and share analysis – Students followed directions but became loud. Professor raised voice to complete directions. – Good job at using vocal volume to manage classroom interaction. - Give all directions and then have students follow through. Otherwise, you’ll have to try to speak over the students. Alternatively, you could have had students pass two/three drawings instead of one on the first exchange.
  - At 9:35, asked students “OK, change papers again.”
  - At 9:36 “OK, change again.” – classroom went silent (because of unfamiliarity with graphic) – I believe the earlier loud talk was due to the students having already seen the graphics of their group-mates.
  - At 9:37 “OK. Change again.” – again there was relative silence
  - At 9:38 “OK. Change again.”
  - At 9:38 “OK. Change.”
  - At 9:39 “OK. Change.”
  - At 9:40 “OK. Change.”
  - At 9:41 “OK. Change.”
  - At 9:42 “OK. Change.”
  - At 9:43 “OK. Change.”
  - At 9:44, asked students to return papers to authors, identify best drawing and justify choice – Although this activity didn’t allow much discussion, the students were engaged and the activity directly supported the lesson (identifying and applying criteria for evaluation).
  - Dismissed class
  - Remained after class to distribute handouts and respond to students
3. **Methodology**
- **Invariably treated students respectfully**
  - Praised students (“Great storytelling...Great strategy.” “That’s more realistic, isn’t it?...” “Yeah...That sort of explains it...Smokey the Squirrel...” “Thanks. Good class today.”)
  - Presented material enthusiastically and clearly; silences could have been filled with more appropriate responses
  - **Used very effective videos, handouts**
4. **Student Involvement**
- Solicited questions, comments, and examples
  - Provided opportunities for group and individual discussion, mostly small group and class discussion
  - All students participated in activities; drawing prompted amusing but relevant, useful discussion

#### Evaluator’s Comments/Recommendations

- \* You provided a friendly, professional, substantive environment in which students could learn.
- \* You were more actively engaged with the students in this class than you were with other classes I’ve observed. Your interaction with students could be more “fluid,” but it was always professional and always relevant to the task. Your use of tag questions is a simple but effective technique that strengthens relationships by prompting a response.
- \* Generally, you effectively used voice volume to maintain control of the classroom. Good job! This is clearly an



improvement. Please pair this with timely execution of tasks and announcing of tasks/directions.  
\* You were much more successful at interacting with students than when I last observed your class. You praised students, you responded directly and clearly to student inquiries, you used tag questions, and you smiled now and then. You seemed more comfortable in class.  
\* You also used techniques (increased voice volume, variation in activities, and pacing) to maintain control of the classroom.  
\* I was very much encouraged by your improvement in interacting with students and in managing the class. Good job. Please continue work in these two areas.

**Instructor's Comments/Responses**

My classroom demeanor and performance during this observation was typical of the rapport I have had with the majority of my students in most of my classes for years. My pedagogy has always been substantive and on-task because of the excellent education I received in one of the most prestigious composition and rhetoric programs in the country. While I am always striving to be more successful by adopting innovations and through critical reflection, I would not characterize my control of the classroom as "clearly an improvement" because that implies a substantive deficiency that did not exist. Likewise, I have always used positive reinforcement (although I note Dr. Weasenforth's suggestion to use more verbal and less gesture reinforcement), directly and clearly answered student inquiries, and used follow-up questions to elicit more probing responses from students. I note the suggestion to fill the silences with "more appropriate responses". However, pregnant pauses give students opportunities to respond and reflect on one another's comments as well.

Rachel Tudor  
Instructor's signature

1/11/16  
Date

[Signature]  
Evaluator's signature

4/15/16  
Date

[Signature]  
Dean's signature

1/12/16  
Date

# Exhibit 7





## DEPARTMENT OF ENGLISH, HUMANITIES, & LANGUAGES

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August 19, 2011

To whom it may concern:

I am writing to recommend Dr. Rachel Tudor for your position opening. Dr. Tudor was my colleague as a professor of English in the English, Humanities, and Languages Department at Southeastern Oklahoma State University from 2004 until 2011.

At Dr. Tudor's first interview, I was very impressed at the description of her teaching methodologies and the depth of her research in several scholarly areas, including Native American literature. She has since acknowledged that expertise both in her teaching and in the impressive number and quality of her publications. In terms of her teaching, Dr. Tudor spent considerable time in the design and implementation of the courses she taught and maintained high standards for her students in academic achievement.

As a colleague, Dr. Tudor endeavored to carry more than her share of the leadership and workload within the department. I recall that, while still relatively a newcomer within the EHL Department, Dr. Tudor led an assessment effort by the department with alacrity and foresight over a several-year period. She participated on committees at both departmental and university levels, and was very active and vocal in her service in Faculty Senate, a faculty-elected position. Needless to say, Dr. Tudor has earned the respect of her colleagues for her conscientious and dedicated professionalism.

I had the advantage of having the office next to Dr. Tudor's, which I believe gave me some insight into the efforts she made toward her professional duties. Though Dr. Tudor has a very quiet demeanor, she was generally hard at work when I came in, often very early in the morning, and still working in the late afternoon.

I find Dr. Tudor to be a likeable, responsible, and professional colleague in all respects pertinent to professional life within the University community. I believe Dr. Tudor's efforts and worthiness has been very apparent in her service to Southeastern, and those same qualities should sustain and promote her service elsewhere as well.

Sincerely,

A handwritten signature in cursive script that reads "Dr. Paula Smith Allen".

Paula Smith Allen, Ph.D.

Professor of English, English Education Coordinator

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## DEPARTMENT OF ENGLISH, HUMANITIES, &amp; LANGUAGES

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September 10, 2010

To Whom It May Concern:

Dr. Rachel Tudor has asked me to write a recommendation letter in support of her application for tenure and promotion, which I am very pleased to do. I have known and worked with Rachel for the past six years since she joined our department here at Southeastern, and I have always considered her an exceptionally valuable asset. Indeed, I was on the committee that originally selected her application from among the many we received and voted to hire her.

Although she made a bit of a slow start, Rachel has recently become one of our most active scholars, with six articles either published or accepted for publication in peer-reviewed journals over the last two years. Her primary emphasis has been on the Native American novel, to which she brings a thoroughly informed and nuanced theoretical perspective, situating it firmly within wider international contexts, such as Latin American magic realism and Euro-American postmodernism. Her achievement in this area is truly impressive and outstanding.

As a teacher, my impression of Rachel is equally laudatory. I know she is always exhaustively prepared for her classes, and projects a demeanor of quiet authority and assured professionalism. Above all, she is interested in challenging the students, many of whom come from a very narrow and limited rural background, with alternative and diverse perspectives on a host of contemporary issues. Several have expressed to me how she convinced them to view matters quite differently than they did before taking her class, and always in the direction of greater tolerance and understanding for those unlike ourselves. On this front alone she makes a major contribution to our department.

Finally, Rachel has also established an solid service record. She is in her second year as a member of the Southeastern Faculty Senate, and before that she served for three years as chair of our Assessment, Planning, and Development Committee, compiling and writing the annual assessment report. This is by far the most important departmental committee, as it oversees all aspects of curriculum development and assessment, potentially charting the course for years to come. In addition, Rachel has been one of the key members of the Native American Symposium Committee, which I chair, helping to

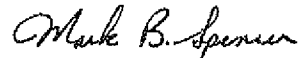
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plan and stage the event every other year. For the 2005 and 2007 symposia, Rachel further served as co-editor with me of the published proceedings, reading and commenting on all the papers submitted, and joining in the selection of those to include.

In short, I can recommend Rachel most highly in all three dimensions of academic performance: scholarship, teaching, and service. I firmly believe she is more than deserving of tenure and promotion at this time.

Sincerely,



Mark B. Spencer  
Associate Professor of English and Humanities





## DEPARTMENT OF ENGLISH, HUMANITIES, & LANGUAGES

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September 13, 2011

To whom it may concern;

I write to give Dr. Rachel Tudor my highest recommendation. I had the privilege of working with Rachel as a colleague in the department of English, Humanities, and Languages at Southeastern Oklahoma State University from my arrival in the fall of 2005 until her departure in the spring of 2011. Rachel is an exemplary teacher, scholar, and colleague, and would make a remarkable contribution to any institution.

Dr. Tudor's teaching is excellent, as exhibited by her teaching evaluations, observations of her teaching by colleagues, and her repeated nomination for the Faculty Senate teaching award. Southeastern is primarily a teaching-oriented institution, with a standard faculty load of 4 courses per semester. As we are a small department, all faculty are called on to teach a wide range of courses at all levels to a very diverse student population. I admire Rachel for her consistent success in tailoring her teaching to all students, combining rigor and accessibility. When she took over teaching our general-education Introduction to Philosophy course in 2006, enrollment skyrocketed, causing the department to add a second section; in the following years, both sections were consistently fully enrolled. Numerous students have told me how inspired they were by Rachel's courses; this semester alone, in my 19-person introduction to the major course, two students announced on the first day that they changed their majors to English because of a class with Rachel. My own teaching has been enriched through ongoing conversations with Rachel about pedagogy over the years; she is unquestionably a deeply talented and committed teacher.

Rachel's scholarship exceeds expectations for both quality and quantity. As a teaching institution, our research expectations are generally quite modest, and most faculty perhaps publish an article every couple of years. In contrast, Rachel has proven herself an incredibly prolific scholar, publishing 10 peer-reviewed articles in the past two years alone. Some of these are in the leading journals of her field; others clearly articulate the relevance of her work to a wider non-specialist audience. This shows that she is a respected scholar within Native American Studies, while simultaneously successfully promoting the importance of Native American literature within a broader context. She co-edited two volumes of the conference proceedings of the Native American Symposium, and has published two chapbooks of poetry since her arrival at Southeastern. All of this has been accomplished while teaching a 4-4 load,

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SOUTHEASTERN OKLAHOMA STATE UNIVERSITY

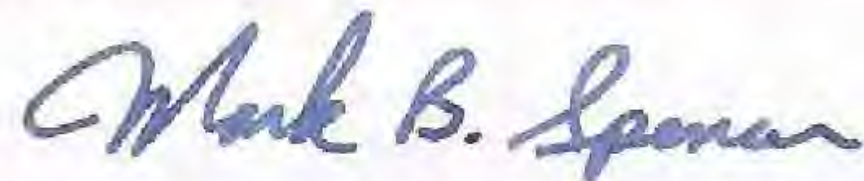
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American Symposium Committee, which I chair, helping to plan and stage the event every other year. The symposium usually features about 50-60 papers and presentations on a wide variety of Native American topics, along with a keynote banquet address by a Native American of distinction in some scholarly or artistic field. For the 2005 and 2007 symposia, Rachel was co-editor with me of the published proceedings, reading and commenting on all the papers submitted.

In short, I can give Rachel my highest recommendation in all three dimensions of academic performance: scholarship, teaching, and service. I hope you will give her every consideration. Please do not hesitate to contact me, if I can be of any further assistance.

Sincerely,



Mark B. Spencer  
Associate Professor of English and Humanities  
[mspencer@se.edu](mailto:mspencer@se.edu)  
(580) 745-2921





## DEPARTMENT OF ENGLISH, HUMANITIES, & LANGUAGES

SOUTHEASTERN OKLAHOMA STATE UNIVERSITY  
1405 N. FOURTH AVE., PMB 4127  
DURANT, OK 74701-0609

580-745-2066  
FAX 580-745-7406  
WWW.SE.EDU

August 15, 2011

To Whom It May Concern:

Dr. Rachel Tudor has asked me to write a recommendation letter for her, which I am very pleased to do. I have known and worked with Rachel for the past six years since she joined our department here at Southeastern, and I have always considered her an exceptionally valuable asset. Indeed, I was on the committee that originally selected her application from among the many we received and voted to hire her.

In recent years Rachel has proved herself the most active scholar in our department, with some ten articles either published or accepted for publication in peer-reviewed journals. Her primary emphasis has been on Native American literature, to which she brings a thoroughly informed and nuanced theoretical perspective, situating it firmly within wider international contexts, such as Latin American magic realism and Euro-American postmodernism. Her achievement in this area is truly impressive and outstanding.

As a teacher, my impression of Rachel is equally laudatory. I know she is always exhaustively prepared for her classes and projects a demeanor of quiet authority and assured professionalism. Above all, she is interested in challenging the students, many of whom come from a very narrow and limited rural background, with alternative and diverse perspectives on a host of contemporary issues. Several have personally expressed to me how she convinced them to view matters quite differently than they did before taking her class, and always in the direction of greater tolerance and understanding for those unlike ourselves. On this front alone she makes a major contribution to our department.

Finally, Rachel has also established an solid service record. She served for two years as a member of the Southeastern Faculty Senate, and for three years before that she was chair of our Assessment, Planning, and Development Committee, compiling and writing the annual assessment report. This is by far the most important departmental committee, as it oversees all aspects of curriculum development and assessment, charting the course for years to come. In addition, Rachel has been one of the key members of the Native

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SOUTHEASTERN OKLAHOMA STATE UNIVERSITY

PI000368



developing new courses, and maintaining the highest quality of teaching. Rachel has clearly established a track-record of producing the highest quality research while teaching a heavy load.

In addition, during her time at Southeastern, Rachel conducted herself as an outstanding colleague, voluntarily taking on a variety of service work. Throughout her time at Southeastern, Rachel helped organize the biannual Native American Symposium, one of our campus's major events, which brings regional, national, and international scholars to Southeastern. Rachel was instrumental in bringing an Oklahoma Scholar Leadership Enrichment Program course to our campus in 2007, the only time in recent memory our campus has hosted one of these prestigious courses. Rachel organized the participation of Dr. Rennard Strickland, Distinguished Professor Emeritus at the University of Oregon Law School, and served as the supervising professor for this course, all in addition to her regular teaching load. Rachel served as the chair of our department's Assessment, Planning, and Development committee from 2007-2010. As chair of this committee, she collected and collated all assessment data for our three English programs, and prepared yearly Program Outcome Assessment Reports as required by our Regents. This, in itself, is an enormous job for a pre-tenure professor to take on. Finally, Rachel served as a member of Faculty Senate for three years; in her last year, as a member of the Senate's Personnel Policies Committee, she was instrumental in re-writing the university's non-discrimination statement in an attempt to make the campus more inclusive for diverse faculty. All of this has been done in addition to standard university and departmental service expectations, including serving on hiring and review committees, volunteering for Honors Day, and working with student groups. In short, Rachel not only amply fulfills service expectations for faculty members, but is exemplary in the range, depth, and dedication she has shown in service to our university.

In summary, Dr. Rachel Tudor is an outstanding teacher, scholar, and colleague. In addition to the expected professional components of her job, she is also an exceptionally thoughtful and gracious human being. She is a pleasure to be around. I encourage you to take the opportunity to get to know her, and to invite her to bring her talents to your school.

Sincerely,



Dr. Margaret Cotter-Lynch  
Associate Professor of English  
Southeastern Oklahoma State University





DEPARTMENT OF ENGLISH, HUMANITIES, & LANGUAGES

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DURANT, OK 74701-0609

580-745-2066  
FAX 580-745-7406  
WWW.SE.EDU

August 24, 2011

To Whom It May Concern:

I am writing this reference in support of Dr. Rachel Tudor and her application to an academic position.

Dr. Tudor's teaching practice exemplifies her commitment to the humanities, in particular to the areas of classical literature, philosophy, and Native American literature. I have twice observed—in my former capacity as department chair—her philosophy classes for purposes of faculty development. Her teaching style clearly motivates students: group work, discussion and lecture are blended effectively. In one class in particular I was impressed as to how the students were excitedly immersed in a discussion of Plato and Orwell. Dr. Tudor's classroom method could be described as Socratic, but in a non-confrontational way. Students were eager to participate. Dr. Tudor has a great deal of experience in teaching a varied range of courses at all undergraduate levels. At Southeastern she has regularly taught first-year composition, general sophomore-level Western humanities, and introduction to philosophy sections. She has twice taught an upper-division Native American Lit class. She also teaches an online version of our general Western Humanities class. As department chair during her time here at Southeastern I witnessed Dr. Tudor develop into a wonderfully engaged teacher.

In terms of service, Dr. Tudor's greatest contribution to Southeastern has been her involvement with our Native American Symposium. The logistics of coordinating even a small conference can be incredibly time consuming. She has also been involved with editing the conference proceedings. She has also been involved in bringing a noted scholar in Native American studies, Rennard Strickland, to teach as a visiting scholar here in the Oklahoma Scholar-Leadership Enrichment Program.

Dr. Tudor has recently been extremely successful in securing forthcoming publication for her scholarly manuscripts. In the past two years she has had about ten articles published or accepted. Particularly impressive is the range of her publications, which focus on topics as varied as Latin American realism, classical literature, medieval literature, Swift, and especially Native American writers.

Sincerely,

A handwritten signature in black ink that reads "John Brett Mischo".

Dr. John Brett Mischo  
Professor

[jmischo@se.edu](mailto:jmischo@se.edu)

(580) 745-2590

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SOUTHEASTERN OKLAHOMA STATE UNIVERSITY

PI000371





DEPARTMENT OF ENGLISH, HUMANITIES, & LANGUAGES

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WWW.SE.EDU

August 15, 2011

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In recent years Rachel has proved herself the most active scholar in our department, with some ten articles either published or accepted for publication in peer-reviewed journals. Her primary emphasis has been on Native American literature, to which she brings a thoroughly informed and nuanced theoretical perspective, situating it firmly within wider international contexts, such as Latin American magic realism and Euro-American postmodernism. Her achievement in this area is truly impressive and outstanding.

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Finally, Rachel has also established an solid service record. She served for two years as a member of the Southeastern Faculty Senate, and for three years before that she was chair of our Assessment, Planning, and Development Committee, compiling and writing the annual assessment report. This is by far the most important departmental committee, as it oversees all aspects of curriculum development and assessment, charting the course for years to come. In addition, Rachel has been one of the key members of the Native

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SOUTHEASTERN OKLAHOMA STATE UNIVERSITY

PI000372



American Symposium Committee, which I chair, helping to plan and stage the event every other year. The symposium usually features about 50-60 papers and presentations on a wide variety of Native American topics, along with a keynote banquet address by a Native American of distinction in some scholarly or artistic field. For the 2005 and 2007 symposia, Rachel was co-editor with me of the published proceedings, reading and commenting on all the papers submitted.

In short, I can give Rachel my highest recommendation in all three dimensions of academic performance: scholarship, teaching, and service. I hope you will give her every consideration. Please do not hesitate to contact me, if I can be of any further assistance.

Sincerely,



Mark B. Spencer  
Associate Professor of English and Humanities  
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SOUTHEASTERN OKLAHOMA STATE UNIVERSITY

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developing new courses, and maintaining the highest quality of teaching. Rachel has clearly established a track-record of producing the highest quality research while teaching a heavy load.

In addition, during her time at Southeastern, Rachel conducted herself as an outstanding colleague, voluntarily taking on a variety of service work. Throughout her time at Southeastern, Rachel helped organize the biannual Native American Symposium, one of our campus's major events, which brings regional, national, and international scholars to Southeastern. Rachel was instrumental in bringing an Oklahoma Scholar Leadership Enrichment Program course to our campus in 2007, the only time in recent memory our campus has hosted one of these prestigious courses. Rachel organized the participation of Dr. Rennard Strickland, Distinguished Professor Emeritus at the University of Oregon Law School, and served as the supervising professor for this course, all in addition to her regular teaching load. Rachel served as the chair of our department's Assessment, Planning, and Development committee from 2007-2010. As chair of this committee, she collected and collated all assessment data for our three English programs, and prepared yearly Program Outcome Assessment Reports as required by our Regents. This, in itself, is an enormous job for a pre-tenure professor to take on. Finally, Rachel served as a member of Faculty Senate for three years; in her last year, as a member of the Senate's Personnel Policies Committee, she was instrumental in re-writing the university's non-discrimination statement in an attempt to make the campus more inclusive for diverse faculty. All of this has been done in addition to standard university and departmental service expectations, including serving on hiring and review committees, volunteering for Honors Day, and working with student groups. In short, Rachel not only amply fulfills service expectations for faculty members, but is exemplary in the range, depth, and dedication she has shown in service to our university.

In summary, Dr. Rachel Tudor is an outstanding teacher, scholar, and colleague. In addition to the expected professional components of her job, she is also an exceptionally thoughtful and gracious human being. She is a pleasure to be around. I encourage you to take the opportunity to get to know her, and to invite her to bring her talents to your school.

Sincerely,



Dr. Margaret Cotter-Lynch  
Associate Professor of English  
Southeastern Oklahoma State University





## DEPARTMENT OF ENGLISH, HUMANITIES, & LANGUAGES

SOUTHEASTERN OKLAHOMA STATE UNIVERSITY  
1405 N. FOURTH AVE., PMB 4127  
DURANT, OK 74701-0609

September 27, 2010

580-745-2066  
FAX 580-745-7406  
WWW.SE.EDU

Dear Tenure and Promotion Committee,

I am writing this letter to recommend Dr. Rachel Tudor for tenure and for promotion to Associate Professor. Since August 2004, Dr. Tudor has been a valuable asset to Southeastern Oklahoma State University, to the English, Humanities, and Languages Department (EHL), and to the students.

Dr. Tudor's scholarship interests are rich and varied with seven articles accepted for publication in prestigious journals for the year 2010 as well as publications from previous years of research, including the year 2009. In addition, Dr. Tudor has been invited to present her work at a variety of conferences and symposiums.

In regards to service, Dr. Tudor has been instrumental in the preparation of assessment documents and has participated in work on other committees for the EHL Department. She is a vital member of the department through her service, astute thinking, contributions, and collegiality. However, Dr. Tudor's service extends beyond the department as she currently serves on the Faculty Senate, has served and participated in the Oklahoma Scholar Leadership Enrichment Program (OSLEP), and has been a tireless supporter, worker, and committee member for the Native American Symposium.

Dr. Tudor's teaching is quite effective with solid student evaluations and with two nominations (2008 and 2009) for the SOSU Faculty Senate Teaching Award. In addition, and quite significantly, students benefit from Dr. Tudor's interests, scholarship, and expertise via the variety of courses she teaches for the EHL Department.

As a Native American and as a specialist in Native American culture, history, and literature, Dr. Tudor brings the richness of diversity through her heritage and through her scholarship to Southeastern Oklahoma State University; to the English, Humanities, and Languages Department; to the courses she currently teaches of composition, humanities, literature, and philosophy; and, most importantly, to the students.

As a fellow faculty member and co-worker, I appreciate the opportunity to work with such a fine scholar and educator. Thank you for the opportunity to recommend Dr. Rachel Tudor for tenure and for promotion to Associate Professor.

Sincerely,

Virginia A. Parrish, Ph.D.  
Associate Professor  
English, Humanities, & Languages Department  
PMB 4234  
Southeastern Oklahoma State University  
Durant, Oklahoma 74710  
Office phone: 580.745.2594  
E-mail: vparrish@se.edu

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SOUTHEASTERN OKLAHOMA STATE UNIVERSITY

PI000376



20 September 2010

Dear Tenure and Promotion Committee:

I am writing in support of Rachel Tudor's application for tenure and promotion to Associate Professor in the Department of English, Humanities, and Languages. I have known Dr. Tudor since 2004, and she has been an asset to the department of English, Humanities, and Languages, to our students, and to the greater Southeastern Oklahoma State University community. Dr. Tudor is sincerely and deeply interested in the success of our students, and she conscientiously makes every effort to determine how she can best serve the students while drawing their attention to the values and the conflicts that inform Western culture in general and American culture, in particular. As a specialist in Native American literature and culture within the context of American history and literature, and as a Native American herself, she is highly cognizant of the fraught situation that arises when Native American literature is taught as separate and distinct from American literature. She performs her culture's ethos by insightfully pointing to the disparities that exist between Native American and American culture; but she accomplishes this pointing in such a way that one is gently led both to understand the disparities and the idea that since these cultural differences are not necessary but chosen, different choices could be made.

Dr. Tudor's teaching is exemplary. She has been nominated in the past two consecutive years for the Faculty Senate Excellence in Teaching Award for the School of Arts and Sciences. The most recent departmental evaluation of Dr. Tudor's teaching supports those nominations and points, in particular, to the mindful way in which the class is taught and the emphasis that is placed on student success and how to achieve it in the given assignment--constructing PowerPoint slides for ancient humanities. In his assessment letter, a faculty observer positively notes the camaraderie between Dr. Tudor and her students and commends her for the careful way she places the day's work in the context of the course. Her teaching reflects the numerous courses she has taken in the Curriculum Instruction and Development in Technology at Southeastern to hone her skills in creating hybrid courses that draw upon online and in-class activities. She has also participated in numerous leadership development courses and assisted in student crisis interventions.

In terms of curriculum, Dr. Tudor has constructed several new courses for the department including one on Great Books, which she suggested in response to a student survey of desired departmental changes. She also devised the course on Native American literature and worked in tandem with the renowned Native American scholar, Rennard Strickland, who taught a course on our campus at the invitation of OSLEP, or the Oklahoma Scholar-Leadership and Enrichment Program, after Dr. Tudor suggested to me that he would be a



good speaker for OSLEP to consider. As the OSLEP representative on our campus at the time, I took her suggestion to OSLEP and they immediately tendered the invitation to Dr. Strickland to be the OSLEP guest lecturer at Southeastern in 2007, the first OSLEP speaker at Southeastern since the 1990's.

The OSLEP program requires that there be a campus coordinator to work with the visiting scholar to help devise the course and assess student involvement. Dr. Tudor took on this task and executed it successfully. Dr. Strickland then became the keynote speaker at Southeastern's biennial Native American Symposium for 2007, a conference that Dr. Tudor helped to coordinate as a member of the Native American Symposium Committee.

As the narrative of Dr. Tudor's experience with the OSLEP program suggests, her service has been an asset to a community far wider than that of Southeastern alone. By serving on the Native American Symposium committee since 2004 and by making suggestions in terms of theme and speaker more than once, Dr. Tudor has served the greater Southeastern community as well. In 2005 she suggested that the topic be "Native Women in the Arts, Education, and Leadership" and was a key player in seeing to it that Native American radio host Jacqueline Battiste attended the 2005 symposium.

Since 2009, Dr. Tudor has also served as a Faculty Senator, elected by the faculty at large. She has served as Chair of the Assessment, Planning, and Development Committee, the most innovative committee of the English, Humanities, and Languages Department. She has also served on hiring committees and on the Five-Year Program Review Committee that I chaired, in which she made a very valuable written contribution that thoughtfully articulated the teaching mission of the department.

It is perhaps in the area of scholarship in which Dr. Tudor has made a great breakthrough in the year 2010. While she has co-edited the Native American Conference proceedings on two occasions and has had articles accepted for publication before this year, 2010 has been a banner year for numerous publications in a broad array of venues that range from regional publications, to Native American collections, to philosophy journals, all indicative of Dr. Tudor's interest in Native American studies, American literature, humanities, and philosophy. In addition to her teaching, service, and scholarship in the world of academia, Dr. Tudor is also an accomplished artist and poet.

Dr. Tudor's passion for teaching and her commitment to her students' success are matched by the high expectations she has for her own scholarship and university service. She will be a thoughtful contributor to any department that is fortunate enough to hire her. If you have any questions or concerns, I would be happy to visit by phone or email.

Sincerely,

Lisa L. Coleman, Ph.D.  
Honors Program Director





September 17, 2010

To whom it may concern:

I am writing to recommend Dr. Rachel Tudor for Tenure and Promotion to Associate Professor within the Department of English, Humanities, and Languages.

I have known Dr. Tudor since her interview and hire. I came to realize her intense interest in teaching, her impressive knowledge in the several fields of English studies, including Native American studies, and her conscientious endeavors (and resulting successes) in teaching those subjects. One of Dr. Tudor's peer teaching observation letters notes that her classroom planning and practices reflect that, as an instructor, she is "knowledgeable, respectful, humorous, helpful, thoroughly prepared, and technologically proficient." Dr. Tudor spends considerable time in the design and implementation of the courses she teaches and maintains high standards for her students in academic achievement.


Dr. Tudor's academic/scholarly record is impressive as well. Beside the academic record that she carried when she came to Southeastern, she has recently presented at least one conference and has had a paper accepted at another. She likewise has had several articles accepted for publication recently by journals well respected in our field. Dr. Tudor also is a creative writer, collecting her poetry and other personal writing in several chapbooks.

As a colleague, Dr. Tudor endeavors to carry (at least) her share of the workload within the department. I recall that, while still a relative newcomer within the EHL Department, Dr. Tudor led an assessment effort by the department with alacrity and foresight over a several-year period. She participates on committees and participates actively in planning and assessment. She works effectively with both faculty and staff members, and her demeanor is always professional regardless of the circumstances.

I have the advantage of having the office next to Dr. Tudor's, which I believe gives me some insight into the efforts she makes toward these different duties and endeavors. Though Dr. Tudor has a very quiet demeanor, she is generally hard at work in her office when I come in every morning, no matter how early I arrive. She is often still working in the late afternoon and evening.

I find Dr. Tudor to be a likeable, responsible, and a professional colleague in all respects pertinent to professional life within the University community, and I hope that the University will recognize and acknowledge Dr. Tudor's efforts and worthiness through the Tenure and Promotion process.

Sincerely,



Dr. Paula Smith Allen  
Professor of English

**DEPARTMENT OF ENGLISH, HUMANITIES & LANGUAGES**  
**SOUTHEASTERN OKLAHOMA STATE UNIVERSITY**

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PI000381





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DURANT, OK 74701-0609

September 27, 2010

580-745-2066  
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Dear Tenure and Promotion Committee,

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Dr. Tudor's scholarship interests are rich and varied with seven articles accepted for publication in prestigious journals for the year 2010 as well as publications from previous years of research, including the year 2009. In addition, Dr. Tudor has been invited to present her work at a variety of conferences and symposiums.

In regards to service, Dr. Tudor has been instrumental in the preparation of assessment documents and has participated in work on other committees for the EHL Department. She is a vital member of the department through her service, astute thinking, contributions, and collegiality. However, Dr. Tudor's service extends beyond the department as she currently serves on the Faculty Senate, has served and participated in the Oklahoma Scholar Leadership Enrichment Program (OSLEP), and has been a tireless supporter, worker, and committee member for the Native American Symposium.

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Sincerely,

Virginia A. Parrish, Ph.D.

Associate Professor

English, Humanities, & Languages Department

PMB 4234

Southeastern Oklahoma State University

Durant, Oklahoma 74710

Office phone: 580.745.2594

E-mail: vparrish@se.edu

# SOUTHEASTERN

A CENTURY OF BUILDING FUTURES

September 24, 1009

To Whom It May Concern:

In the time that Dr. Rachel Tudor has been a member of our department, I have had numerous opportunities to visit with her, and we have developed a personal as well as a professional friendship. From the first I have found her to be a great conversationalist with a pleasant personality. She has never failed to greet me with a ready smile and a welcoming attitude. Our conversations have been varied, though mostly centered around mutual reading interests, and her outlook and comments are always thought-provoking.

In my language classes students talk about their other courses as part of a chapter theme, and on several occasions students have remarked that they find Dr. Tudor's courses fascinating. Students have also commented that they consider her to be knowledgeable in her field, presenting subject matter in a manner that is challenging as well as interesting, and that they look forward to her lectures. Several students have specifically expressed an awakened interest in Native American literature.

Dr. Tudor's work within our department has also been exemplary. Whether addressing us as a committee member or as a department, she is so clear and concise in her presentation that we seldom have any questions as to clarification.

I have tremendous respect for Dr. Tudor as a person, an educator, and a scholar. We are fortunate to have her on our faculty.

Sincerely,



Kim B. McGehee

DEPARTMENT OF ENGLISH, HUMANITIES & LANGUAGES  
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IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

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

**MEMORANDUM OPINION AND ORDER**

Plaintiff brought the present action asserting that Defendants violated Title VII during the course of her employment as an associate professor at Southeastern Oklahoma State University (“Southeastern”). The matter was tried to a jury, which found in favor of Plaintiff. Plaintiff has now filed a post-trial motion requesting the Court reinstate her to her position as associate professor at Southeastern and grant her tenure. Plaintiff’s request comes pursuant to 42 U.S.C. § 2000e-5(g). Plaintiff also requests the Court award front pay from the date of the jury’s verdict to the date of her reinstatement. Plaintiff notes that in the event the Court denies her request for reinstatement she may request additional front pay damages. Defendant objects to Plaintiff’s request for reinstatement, arguing that the relationship between Plaintiff and Southeastern is such that reinstatement is impractical and that even if the Court were to consider reinstatement that granting Plaintiff tenure

would be inappropriate, as that is a decision that should be made by Southeastern, rather than by the Court.

It is clear that reinstatement is the preferred remedy. See Jackson v. City of Albuquerque, 890 F.2d 225, 231 (10th Cir. 1989) (quoting EEOC v. Prudential Assoc., 763 F.2d 1166 (10th Cir. 1985)). Plaintiff has the burden of establishing her entitlement to reinstatement; however, this burden is met where she demonstrates that she has prevailed on her discrimination claim. See Donnellon v. Fruehauf Corp., 794 F.2d 598, 602 (11th Cir. 1986). Where Plaintiff has met her burden, the Court must determine if “reinstatement or front pay is the appropriate remedy.” Abuan v. Level 3 Commc’ns, Inc., 353 F.3d 1158, 1176 (10th Cir. 2003). Reinstatement is not feasible where there is continuing hostility between Plaintiff and the employer or its workers. Prudential, 763 F.2d at 1172.

In support of her request for reinstatement, Plaintiff states that she desires to return to Southeastern and believes that she can be successful teaching in that environment. Plaintiff argues that she did well while she was teaching there and has continued to develop her skills as a professor and stay current in her line of expertise. Plaintiff then offers a number of other personal reasons which reinstatement to Southeastern would satisfy. Plaintiff also notes that all of the former members of administration with whom she had problems while teaching at Southeastern have now left and that she feels positive the new administration will support her role as an associate professor.

In response, Defendants offer testimony from Dr. Randy Prus, who is currently the Chair of Southeastern’s Department of English, Humanities, and Languages, the Department to which Plaintiff wishes to be reinstated. Dr. Prus argues that Plaintiff should

not be reinstated, as neither her tenure packet nor her teaching style merit appointment as an associate professor or promotion to tenure. Indeed, Dr. Prus voted against granting her tenure during the 2009-10 process. Defendants point to Dr. Prus's testimony at trial where he noted that he did not believe Plaintiff's return to Southeastern would be a positive thing, for the university or the students. Defendants also note that Plaintiff's work since leaving Southeastern demonstrates that her work performance is insufficient to merit reinstatement.

To determine whether reinstatement is appropriate, the courts must conduct a fact-based assessment of feasibility. Greenbaum v. Svenska Handelsbanken, NY, 979 F. Supp. 979, 986 (S.D.N.Y. 1997). Further, "reinstatement may not be an appropriate remedy where hostility or animosity between the parties, as a practical matter, makes a productive and amicable working situation [im]possible." Thornton v. Kaplan, 961 F.Supp. 1433, 1437 (D. Colo. 1966). After considering the evidence offered by the parties, the Court finds that reinstatement is simply not feasible in this case. As has been the case throughout this litigation, there is clear evidence of ongoing hostility between the parties apparent in the briefs and the evidence. Whether as a result of counsel or the parties, there are repeated unnecessary attacks on individuals and their character or credibility. Neither side is blameless in this matter. However, the Court finds that the repeated occurrences offer at least some evidence that reinstating Plaintiff to Southeastern would only create an ongoing environment of hostility. Such an environment would be patently unfair to the students at that school. Next, Defendants have offered substantial competent evidence demonstrating that they are convinced that Plaintiff's teaching abilities and academic pursuits do not rise to the level which would warrant a tenured professorship at Southeastern. According to

Defendants, Plaintiff does not appear to have published anything in the last six years and her work at Collin College ended based on that university's determination that she was not a good teacher. Dr. Prus noted during his trial testimony that Plaintiff's lack of scholarly activity was one of the reasons he voted against granting her tenure in the 2009-10 process. Placing Plaintiff back into an environment where she is considered unworthy would lead to renewed litigation between the parties and again, that result is unacceptable.

Other than her own testimony, Plaintiff's only evidence in favor of reinstatement was the testimony of Dr. Meg Cotter-Lynch; however, Dr. Cotter-Lynch was not privy to Plaintiff's tenure application packet and has admittedly never seen her teach in class. Thus, her testimony in favor of granting Plaintiff reinstatement and tenure must be measured against these facts.

Accordingly, for the reasons set forth herein, Plaintiff Dr. Rachel Tudor's Motion for Reinstatement (Dkt. No. 268) is DENIED. Plaintiff shall file any request for front pay within 15 days of the date of this Order.

IT IS SO ORDERED this 29th day of January, 2018.

  
ROBIN J. CAUTHRON  
United States District Judge



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  
MOTION AND INCORPORATED BRIEF IN SUPPORT OF  
RECONSIDERATION OF REINSTATEMENT

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Dr. Tudor respectfully requests reconsideration of the January 29, 2018 Opinion (ECF No. 275) pursuant to Fed. R. Civ. P. 60(b). Dr. Tudor also respectfully requests that the Court hear oral argument on this motion as permitted by Local Rule 78.1. Oral argument in this case of national importance will illuminate the positions of the parties, assist the Court in assessing the fact record, as well as shed greater light on the equities.

### Preamble

From the very beginning, Dr. Tudor's case has been about one thing—returning to Southeastern with the tenured position she earned. For years Tudor has held on, knowing that her only path back to Southeastern is through this Court's intervention.

Dr. Tudor humbly requests that the Court reconsider its Opinion for four reasons. First, there are core factual findings which are not supported by the record. Second, there are holdings of law which conflict with binding precedent. Third, there are equitable considerations which warrant reassessing the propriety of reinstatement under the very specific circumstances of this case. Fourth, there are changes in circumstance evidencing Tudor's scholarly productivity.

#### **I. FINDINGS OF FACT INCONSISTENT WITH THE RECORD**

Dr. Tudor respectfully points to the following core findings of fact undergirding the Opinion which are inconsistent with the record.

A. There are no hostilities.

*Jury's verdict precludes finding of hostilities.* In good faith, Tudor brought a hostile work environment claim and presented evidence in support at trial. As the finder of fact, the jury ultimately sided with Defendants, resolving that there is insufficient evidence of hostilities. *See* ECF No. 262 (answering in the negative to the question “Has Plaintiff proven by a preponderance of the evidence her hostile work environment claim?”). The Opinion errs in supplanting the jury’s finding that there are no hostilities with the irreconcilable finding that there are “ongoing hostilities” in the workplace rendering reinstatement impossible (Op. at 3).

*No evidence of “ongoing hostilities.”* The Opinion’s finding of fact that there is an “ongoing environment of hostility” (Op. at 3) is also against the weight of evidence.

First, there is uncontroverted evidence that Tudor does not harbor hostilities towards Southeastern. *Contra* Op. at 3 (hypothesizing that fruits of the adversarial process indicate “ongoing hostilities”). Dr. Tudor truthfully told the jury about the pain she has endured, but assured that this lawsuit is not about vengeance—it is simply her only pathway back to Southeastern.<sup>1</sup>

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<sup>1</sup> Tudor opened her trial testimony by telling the jury that this lawsuit is not about vengeance, “It’s about doing the right thing. It’s about fairness and justice. It’s about giving me a chance to contribute and to give back to so many who have made my accomplishments possible.” ECF No. 246 39:2–8. Tudor further explained, “This case is about me getting my job back. I want to work. I’ve always just wanted to be able to do my job, just like I think



Dr. Tudor also testified extensively that this litigation has not poisoned her against Defendants.<sup>2</sup> Additionally, Tudor submitted lengthy declarations wherein she disclosed to the Court her positive feelings about Southeastern (ECF No. 268-1 ¶ 4), that this litigation has not poisoned things (*id.*; *id.* ¶ 7(a)), her positive feelings about her Southeastern colleagues in the Department (*id.* ¶ 5(a); ECF No. 271-1 ¶ 5(a)–(c)) and the new Southeastern administration (ECF No. 268-1 ¶ 6(b)), and her conviction that a healthy reunion is not only possible but probable (see, e.g., *id.* ¶ 6; ECF No. 271-1 ¶ 5(c)).

Second, there is uncontroverted evidence that, *at this juncture*, Southeastern harbors no ill-will towards Tudor. Prior to trial, Dr. Prus and President Burrage openly and matter-of-factly explored Tudor’s return (ECF No. 271-3 ¶ 3; *id.* at 14–15); neither indicated Tudor’s return was impossible because of “ongoing hostilities.” Leading up to and at trial, four out of seven of the English Department’s tenured professors attested that they do not oppose Tudor’s return.<sup>3</sup> Most tellingly, Defendants’ lead counsel, Ms. Coffey,

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anybody else would want to, especially if you’ve trained for something, you’ve worked for something your entire life.” *Id.* at 129:7–10.

<sup>2</sup> See, e.g., ECF No. 246 at 129:15–24 (Question: “After all of this, do you think, truthfully, if given the opportunity to go back and teach, you could put this all behind you and teach?” Answer: “Yes. Yes, of course. Yes. The classroom, it’s—I call it my clean, well-lighted place. It’s where I feel safe and secure. My department is a place where I feel welcome and at home. The students were always welcoming, and I see no downside to it. It’s—I can’t think of any reason not to return.”).

<sup>3</sup> 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

promised the jury that Defendants have not and never would tolerate hostilities towards Tudor<sup>4</sup> and assured that this litigation itself has neither uncovered evidence of concrete hostilities nor caused them.<sup>5</sup>

Post-trial events show a similar lack of hostilities. Dr. Cotter-Lynch, a high-level Southeastern administrator, attests that there is no vocal opposition to Tudor's return on campus and no one in the Department will oppose Tudor's return if it is ordered by this Court (ECF No. 268-2 ¶ 5(a); *id.* ¶ 9). President Burrage and a prominent RUSO regent—both of whom attended trial—extended an olive branch to Cotter-Lynch, expressing a desire for conciliation and healing for all, including Dr. Tudor (ECF No. 268-2 ¶ 8(c)(i)–(iii)). Ms. Carolyn Fridley, an instructor in the Department and respected member of the Southeastern community, advised the Court that she “would personally welcome” Tudor's return (ECF No. 271-4 ¶ 4). Most tellingly, in the immediate hours after the verdict, President Burrage released an indisputably sincere public statement proclaiming that all of

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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. 263 at 352:16 (Cotter-Lynch testifying, “I want her to come back to her job. She earned it.”).

<sup>4</sup> See ECF No. 246 at 36:6–9 (“What is a university if it is not a place that fosters ideas, encourages personal growth, encourages difference, supports change? That was the campus of Southeastern. That is the environment that Rachel Tudor worked in.”)

<sup>5</sup> See ECF No. 246 at 35:22–25 (“[T]hese supposed hostile work environments [] just didn't exist. After several years of investigation, two and a half years of litigation, there is still no evidence . . . .”); ECF 266 at 853:16–18 (“there has been no evidence of hostilities that Dr. Tudor was subjected to, no evidence at all”).



Southeastern “respects the verdict rendered today by the jury” (ECF No. 268-2 at 15). Burrage’s statement speaks volumes. Remarkably, Burrage went one step further, personally meeting with Southeastern faculty to request their assistance in healing the campus and Tudor (ECF No. 268-2 ¶ 8(c)(ii)).

Third, on the eve of trial, Defendants entered into a robust and historic Compromise Agreement with the United States, evidencing a sincere and good faith desire to mend relationships. Key terms of the Agreement mandate extensive policy changes at Southeastern to prevent what happened to Tudor from recurring *and* oblige Defendants to specially protect Tudor from discrimination and retaliation in their workplace (ECF No. 268-3 ¶ 16).

Plainly, the Compromise Agreement evidences both a significant change in Defendants’ approach to Tudor and indisputable proof of institution-wide commitment to do the right thing going forward. Moreover, the Agreement sets the stage for peaceful reunification, not unbridled hostilities. After-all, Defendants’ could not have committed to specially protect Tudor in their workplace if they did not believe themselves capable of treating Tudor fairly and licitly upon her return. Lastly, nothing in the record suggests let alone evidences that Defendants entered into the Compromise Agreement in anything other than good faith, with an eye towards bettering Southeastern and mending relations with Tudor.

*Counsel have not poisoned the environment.* The Opinion found, in part, that Tudor’s return is infeasible because there is “at least some evidence” of tension between the parties in the form of “unnecessary attacks on individuals and their character or credibility” Op. at 3. Respectfully, the record does not sustain a finding of fact that counsel have poisoned relations between the parties. There is no trial or deposition testimony, declaration or statement, or evidence of any other kind indicating that counsel (any counsel) have sown, perpetuated, or fanned hostilities between the institutions and the real persons involved in this case such that reinstatement is impossible.

*Students will not be harmed if Tudor returns.* On the premise that there are “ongoing hostilities,” the Opinion found as fact that Southeastern’s students would be harmed by reinstatement. Op. at 3 (“Such an environment would be patently unfair to the students at that school.”). While the wellbeing of Southeastern’s students is of course an important concern, the record does not support a finding that the students will be harmed by Tudor’s return.

First, incontrovertible evidence shows that during the period of greatest tension—Tudor’s protected activities in 2010 and 2011—Tudor thrived in the classroom and Southeastern’s students were well-served. For example, Tudor was nominated for Southeastern’s Excellence in Teaching Award in 2010 and 2011 (ECF No. 271-2 at 47–49). Additionally, student evaluations from Spring 2011—Tudor’s last and most difficult semester on



campus—show Tudor’s students gave her exceptionally high reviews. Indeed, Tudor out-performed her department, Southeastern, *and* nationwide averages that term. *See* ECF No. 271-2 at 25. Given that Tudor ensured that Southeastern’s students thrived even at the height of Defendants’ misconduct towards her, there is no reason to believe that they could not do so again now that a jury of Oklahoman citizens has fairly adjudicated the very dispute that precipitated this litigation in the first place.

Second, uncontroverted evidence of current student sentiments makes clear they harbor no concerns about Tudor’s return. Indeed, the students’ only fears center on the financial costs of Southeastern’s defense of Tudor’s suit, not Tudor’s reinstatement.<sup>6</sup>

**B. Tudor has the capacity to perform her job.**

Reconsideration is also warranted here because the Opinion’s findings related to Tudor’s qualifications for tenure are in tension with both the jury’s verdict and the record. *Contra* Op. at 3–4 (“Defendants have offered substantial competent evidence demonstrating that they are convinced that Plaintiff’s teaching abilities and academic pursuits do not rise to the level which would warrant a tenured professorship at Southeastern.”).

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<sup>6</sup> *See* ECF No. 271-3 § (6) (Tudor’s verdict has been positively received on campus and that the only issue raised by students is concern over how Southeastern will fund its defense of this litigation); ECF No. 271-3 at 35 (Faculty Senate minutes revealing that Southeastern administrator Dr. Bryon Clark had spoken with students and their only concern is the financial cost of this litigation).

*Jury's verdict forecloses reexamination of Tudor's merit.* The jury found that Tudor's 2009-10 tenure application merited tenure and the only reason Tudor was deprived of tenure was Defendants' illicit actions, not their beliefs concerning her merit. *See* ECF No. 262 at 1 (answering in the affirmative to the question "Has Plaintiff proven by a preponderance of the evidence that she was denied tenure in 2009-10 because of her gender?"). If discrimination was not the cause of denial, Tudor could not have prevailed. *See generally* ECF No. 257 at 12–13 (Jury Instruction No. 7 titled "Title VII—Tenure"). Given this, the Opinion's finding that Defendants' believe Tudor did not merit tenure in 2009-10 is error because it irreconcilably conflicts with the jury's verdict.

*Tudor's "teaching."* Another basis on which the Opinion denies reinstatement are the findings that Dr. Prus opposes reinstatement because of Tudor's "teaching style" (Op. at 2–3) and Southeastern believes the circumstances of Tudor's separation from Collin College show she is "not a good teacher" (Op. at 4). These findings are not supported by the record.

Dr. Prus never testified that he opposes Tudor's return because of her "teaching style." Moreover, that conclusion is not tenable given Prus' actual testimony and other evidence. At trial, Prus stated he vaguely recalled observing Tudor in the classroom on two occasions and, without benefit of exhibits, said that he thought his impression at the time was that she "could



have been more engaging.” ECF No. 264 at 466–67. But Prus was quick to clarify that Tudor’s teaching performance was not disqualifying and her skills were on par with those of other tenured professors at Southeastern. *Id.* 467:16–18. Prus’ contemporaneous memorializations of the classroom observations shed greater light on his true impressions of Tudor. Therein, Prus asserts Tudor is “certainly knowledgeable” (ECF No. 271-1 at 2) and employs “appropriate pedagogy” (*id.*); Prus was also “quite impressed by the level of instruction and the energy in the classroom” (*id.* at 4).

As to Tudor’s teaching at Collin College and the circumstances of her separation—there is no deposition or trial testimony, declaration, statement, or evidence of any other kind showing that Southeastern academics have reviewed Tudor’s Collin College record and determined it to be poor, let alone that they believe it is reason to keep Tudor out of Southeastern.

Additionally, there is no evidence showing that Tudor separated from Collin College because “she was not a good teacher.” *Contra Op.* at 4. Not a single person affiliated with Collin College testified in this matter about the reason for Tudor’s separation. This is despite the fact that Defendants previously told the Court that such testimony was necessary to prove why Tudor separated.<sup>7</sup> The only evidence Defendants pointed to is a single

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<sup>7</sup> See, e.g., ECF No. 213 at 5 (“Dr. Weasenforth’s testimony will directly challenge the veracity of Intervenor’s lofty opinion of her abilities, and will explain why the administration at Collin College determined that Intervenor was not qualified to be a

document<sup>8</sup> that is both taken out of context and does not say that Tudor is “not a good teacher.” Against that document, Tudor proffered letters of recommendation from Collin College colleagues commending her teaching (ECF No. 271-2 at 51–53) and a declaration from Mrs. Jonelle Weier (ECF No. 271-5), one of Collin College’s and Tudor’s star students. Weier took time during her Christmas break from Harvard University (where she transferred after taking classes with Tudor at Collin), to tell this Court that “Dr. Tudor’s teaching is a great exhibit of what professors in higher education should strive to be” (*id.* ¶ 19).

***Tudor’s “academic pursuits.”*** The Opinion is also premised on the finding that current Southeastern employees deem Tudor’s post-termination “academic pursuits” so deficient as to make reinstatement impossible (Op. at 3). However, there is no deposition or trial testimony, declaration, statement, or evidence of any kind showing that academics at Southeastern have

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professor at their institution, as well as the reason they chose not to renew her contract.”); *id.* (arguing that testimony “from a dispassionate third-party such as Dr. Weasenforth” is necessary to prove Tudor’s teaching is poor).

<sup>8</sup> There are several problems with this “evidence.” First, the January 11, 2016 document (ECF NO. 270-7) is merely a recommendation from Weasenforth about Tudor’s contract—the ultimate decision on renewal is made by Collin College’s governing board; no testimony or documents going to that decision is in evidence. Second, the January 2016 document states Tudor “needs improvement” in minute aspects of teaching, not that she is a “bad teacher” or that her teaching is the reason for separation (ECF No. 270-7 at CC307). Third, Tudor has pointed to strong evidence showing that Weasenforth’s nonrenewal recommendation was retaliatory. Specifically, Tudor showed evidence that Weasenforth originally recommended her for renewal in a document dated September 14, 2015 (ECF No. 271-2 at 77–88), but that Weasenforth changed his recommendation after Tudor requested that he make corrections to his narrative evaluation because it overly emphasized student complaints that Collin College found meritless. *See* ECF No. 271-1 ¶ 3(c).



reviewed Tudor’s current curriculum *vitae* (ECF No. 268-1 at 15–24) and concluded that Tudor cannot do her job.<sup>9</sup> The only academic fact witness who has offered testimony concerning Tudor’s post-Southeastern work is Dr. Cotter-Lynch, whom swears Tudor’s record supports reinstatement.<sup>10</sup>

**C. No risk of Tudor being made to feel “unworthy” if she returns.**

The Opinion finds as fact that if Tudor were to return to Southeastern she would be “considered unworthy” by her colleagues and thus reinstatement is infeasible. Op. at 4. The record does not support this finding.

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<sup>9</sup> The Court held that Defendants believe Tudor’s work product since leaving Southeastern is so deficient that reinstating her is infeasible. Op. at 3. There are compounded errors here. First, the only “evidence” Defendants’ presented speaking to their assessment of Tudor’s current qualifications is argument of their attorney, Mr. Joseph, which is not evidence. To support this finding of fact Defendants must supply testimony from a Southeastern fact witness who has evaluated Tudor’s current academic qualifications. None was provided. Second, due to an analytical error of Mr. Joseph’s, the Court has misapprehended Tudor’s current qualifications. Mr. Joseph proffered to the Court a 2012 copy of Tudor’s curriculum *vitae* ECF No. 270-16 at 4–11; see also ECF No. 271-1 ¶ 4(c) [Tudor identifying document as part of a 2012 job application], and reasoned based upon that document alone that Tudor did not have any teaching, scholarship, or service between 2012 to 2017—a six year period—and therefore she did not merit tenure. Tudor’s current *vitae*, which she provided to the Court in support of her motion for reinstatement (ECF No. 268-1 at 15–24), is nine pages long, is substantially different, and contains new achievements and accomplishments Joseph did not assess. Among other things, it shows Tudor gave an invited lecture titled “Post-Truth America: A Native American Guide to Survivance” at a public college in New Jersey in 2017 and that she was bestowed with a civil rights award by Oklahomans for Equality in 2016.

<sup>10</sup> Cotter-Lynch attests that she: reviewed Tudor’s current curriculum *vitae* (ECF No. 271-3 at ¶ 5(d)); discussed and assessed Tudor’s scholarship, teaching, and service capacity with Tudor recently (ECF No. 271-3 ¶ 5(a)–(e) [positively evaluating Tudor’s scholarship]; ECF No. 268-2 ¶ 7(c) [similar positive review of Tudor’s scholarship]; *id.* § 7(a) [positive review of Tudor’s teaching]; *id.* ¶ 7(b) [positive review of Tudor’s teaching]); and concluded that Tudor is fit to return to Southeastern (*id.* ¶ 7 [“I have absolutely no reason to believe that, if Tudor returns to Southeastern, she would be unable to meet Southeastern’s exacting standards in the areas of teaching, service, and scholarship.”]).

*Tudor has no propensity to feel “unworthy.”* There is no evidence that Tudor is predisposed to feel “unworthy” if she returns to Southeastern let alone that those feelings would make her return unworkable. Indeed, Tudor attests that she feels “vindicated” by the jury’s verdict (ECF No. 268-1 ¶ 1), that she believes the verdict resolves any “lingering doubts” there may be about her qualifications (*id.* ¶ 9), and that she looks forward to returning to work at Southeastern despite this protracted litigation (*id.* ¶ 7(a)).

*Dr. Prus’ opinion on tenuring Tudor.* The Opinion also misapprehends Prus’ testimony regarding Tudor’s scholarship and, ultimately, Prus’ opinion on tenuring Tudor. Prus never testified that Tudor had a total “lack of scholarly activity” at the time of her 2009-10 application or that the 2009-10 application forever convinced him that she does not merit tenure. *Conta Op.* at 4 (finding Prus testified Tudor’s “lack of scholarly activity” was the reason he voted against tenure in 2009-10 and that this is why Prus’ opposes reinstatement). At trial, Prus said he recalled thinking Tudor’s 2009-10 application “didn’t quite show promise” (ECF No. 474:7). However, Prus clarified that any lingering doubts he had were quelled by the time of Tudor’s 2010-11 application. By that juncture, Prus believed that Tudor merited tenure (*id.* 486:6–14). Moreover, Prus has not testified that he believes Tudor does not presently merit tenure.



*Dr. Prus' opinion of Tudor's publication record.* The Opinion finds as fact that Tudor will feel “unworthy” if she returns because she has not published articles “in the last six years,” implying that Dr. Prus in particular will be so critical that new litigation will brew. *Op.* at 4. The record does not support this finding.

Dr. Prus neither deems professors to “lack scholarly promise” nor labels them “unworthy” simply because they experience a publication dry spell. At present, Tudor has a career total of fourteen *published* articles (ECF No. 268-1 at 17–18 [showing eleven peer review articles and three book reviews]), with more on the way (see *infra* Part IV). Prus himself has a career total of two publications, the most recent of which was published fourteen years ago. See ECF No. 271-3 at 26–27 (showing two peer review articles, two “proceedings,” and three “poetry collections”; also showing Prus’ most recent publication came out in 2004). As explained by tenure expert Dr. Parker, it is a given that all of the tenured professors in the Department merit tenure. ECF No. 263 at 236:7–14. Further, the tenured faculty’s achievements fairly set the bar for what is expected in the Department. *Id.*; see also ECF No. 205-16 at 1 (Parker Report: achievements of Department professors awarded tenure by Southeastern “define[] a level of qualifications that Southeastern, by its own standards, has decided merits tenure and promotion”). Using Prus’ own work product as a guidepost, Tudor easily meets the mark both in terms

of quantity of publications (fourteen is more than two), and frequency of publication (a six-year dry spell is considerably shorter than a fourteen-year dry spell).

**D. Other Findings Unsupported by the Record**

*Dr. Cotter-Lynch's testimony.* The Opinion also made findings of fact concerning the testimony of Cotter-Lynch which are unsupported by the record. The Opinion held that Cotter-Lynch's testimony in support of reinstatement must be discounted because she never saw one of Tudor's tenure packets or Tudor teach. Op. at 4. However, Cotter-Lynch testified at trial that she both read Tudor's 2010-11 tenure packet (ECF No. 263 at 359:10–13) and has seen Tudor teach (*id.* at 336:12–15).

*New Litigation.* The Opinion is also premised on the finding that it would be a disservice to the parties for Tudor to be reinstated because new litigation would result. *See* Op. at 4 (reinstatement “would lead to renewed litigation between the parties and again, that result is unacceptable”). But there are no facts in the record which evidence that new litigation will ensue if Tudor returns. Plainly, Tudor has no reason to sue Southeastern if she returns with tenure. Indeed, Tudor told the Court that tenure is her goal and she does not foresee other problems if she returns (ECF No. 268-1 ¶ 7(a)–(d)). Conversely, Southeastern has no legal cause of action against Tudor if she returns. Indeed, the prospect of a lawsuit of that ilk is highly unlikely as it



would trigger a breach of the Compromise Agreement (ECF No. 268-3 at ¶ 16) and a violation of Title VII. Dispositively, there is no evidence that Southeastern has threatened to sue Tudor if she returns.

***Missing Evidence Produced by Tudor.*** The Opinion is also premised on the erroneous finding that Tudor presented only her own declaration and that of Cotter-Lynch as evidence in support of reinstatement. *See Op.* at 4 (“Other than her own testimony, Plaintiff’s only evidence in favor of reinstatement was the testimony of Dr. Meg Cotter-Lynch.”). However, Tudor presented *six* declarations and hundreds of pages of other new evidence to the Court<sup>11</sup> as well as cited to trial testimony and other parts of the record in her

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<sup>11</sup> Tudor proffered: two declarations from herself (ECF Nos. 268-1 and 271-1); two declarations from Cotter-Lynch (ECF No. 268-2 and 271-3); a declaration from Ms. Carolyn Fridley, an instructor in the Department (ECF No. 271-4); a declaration from Tudor’s former student at Collin College, Mrs. Jonelle Weier (ECF No. 271-5); ninety-one pages of RateMyProfessor.com ratings (ECF No. 271-6); eight formal classroom observations, including five from her time at Southeastern and three from Collin College (ECF No. 271-7); forty-three pages of student evaluations, thank you notes, and emails (ECF No. 271-2 at 2–45); twelve letters of recommendation from her Southeastern colleagues (ECF No. 271-8); two letters of recommendation from her Collin College colleagues (ECF No. 271-2 at 51–53); a copy of Southeastern’s new nondiscrimination policy which specially protects transgender persons from sex discrimination (ECF No. 268-2 at PI002070–2118); a press release from Southeastern expressing support for the jury’s verdict (ECF No. 268-2 at 15); RUSO business records showing removal of the health plan’s transgender exclusion (ECF No. 268-4); records showing Collin College investigated several of the student complaints against Tudor and found them to be meritless (ECF No. 271-2 at 55–57; *id.* 271-2 at 75); a syllabus from one of Tudor’s recent classes (ECF No. 271-2 at 59–70) and an essay assignment (ECF No. 271-2 at 72–73); an email chain between Dr. Prus and Tudor showing Prus supported Tudor’s 2010-11 application as well as offered to write her letters of recommendation for the job market if she did not win tenure (ECF No. 271-2 at 90); and Tudor’s original 2015 contract renewal evaluation from Collin College which shows when compared to ECF No. 270-7 that, prior to Tudor’s complaints about discrimination, her supervisor recommended her contract for renewal.

reinstatement bid (*see generally* main motion [ECF No. 268] and reply [ECF No. 271]).

## II. CONFLICTS WITH BINDING PRECEDENT

Since the beginning, reinstatement has been Title VII's preferred remedy. Reinstatement is normally not denied. While the Court has some discretion, it is limited. Dr. Tudor respectfully submits that key holdings of law in the Opinion conflict with binding precedent.

*Reinstatement can only be denied in rare cases.* The Opinion cites *Abuan v. Level 3 Communications, Inc.*, 353 F.3d 1158, 1176 (10th Cir. 2003), for the proposition that the ultimate question of reinstatement is left to the district court's discretion (Op. at 2). However, other binding precedents clarify considerable limits on the court's power to deny reinstatement. For instance, *Bingman v. Napkin & Co.*, 937 F.2d 553, 558 (10th Cir. 1991), teaches that reinstatement may only be denied where there are concrete factual findings showing "special instances of unusual work place hostility or other aggravating circumstances." The Tenth Circuit has clarified in other cases, like *James v. Sears, Roebuck and Co., Inc.*, 21 F.3d 989 (10th Cir. 1994), that nearly every reinstatement will cause tensions in the workplace and that those inevitable tensions cannot sustain denial. *Id.* at 997 (holding that neither a shouting match between employee and potential direct supervisor or having to work under supervisor who testified in favor of



employer at trial support finding that reinstatement is infeasible due to hostilities). *Contra* Op. at 3 (denying reinstatement in part because the Court believed Tudor’s return might “create an ongoing environment of hostility”).

***One-sided employer resistance is no grounds to deny reinstatement.***

The Opinion is premised in part on the holding that there may be one-sided hostilities from Southeastern if Tudor returns on that basis denied reinstatement. Op. at 4 (speculating that if Tudor returns to Southeastern there may be an environment “where she is considered unworthy”; holding that Prus would deem Tudor unworthy if she returned). This is also error. In *Jackson v. City of Albuquerque*, the Tenth Circuit teaches that reinstatement cannot be denied because of “[a]ctual or expected ill-feeling.” 890 F.2d 225 (10th Cir. 1989). *Jackson* also teaches that reinstatement cannot be denied where “impossibly high” hostilities in the workplace are one-sidedly pushed by the employer. Indeed, the *Jackson* Court goes so far as to hold that if an employee “want[s] to return to a hostile work environment,” she is entitled to do so. 890 F.2d at 235.

***Employer’s past poor treatment cannot support denial of reinstatement.*** The bare fact that an employer mistreated an employee in the past is not, without a clear record of present hostility supported by contemporaneous testimony bearing on this issue, grounds to deem reinstatement infeasible. *See Bingman*, 937 F.2d at 558 n.8 (approving

approach articulated in *Marshall v. TRW, Inc. Reda Pump. Div.* for Title VII reinstatement remedies); *Marshall v. TRW, Inc. Reda Pump. Div.*, 900 F.2d 1517, 1523 (10th Cir. 1990) (holding under Oklahoma’s nondiscrimination laws that reinstatement not infeasible simply because the jury found a retaliatory discharge absent record testimony evidencing extreme hostilities). The Court thus errs by adopting a conflicting rule that Defendants’ record of past bad treatment of Tudor is reason to deny her reinstatement. *See Op.* at 4 (“Placing Plaintiff back into an environment where she is considered unworthy would lead to renewed litigation between the parties and again, that result is unacceptable.”)

***Only concrete evidence of “extreme hostility” can support denial of reinstatement.*** The Opinion cites one precedential case, *EEOC v. Prudential Assoc.*, 763 F.2d 1166, 1172 (10th Cir. 1985), for the proposition that “continuing hostility” between the employee and employer is grounds to deny reinstatement<sup>12</sup> (*Op.* at 2). But *Prudential* does not adopt a “continuing

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<sup>12</sup> The Opinion cites one non-precedential, *Thornton v. Kaplan*, 961 F.Supp. 1433, 1437 (D.Colo. 1996), for the same proposition (*Op.* at 3). But *Thornton* is distinguishable on the facts. The *Thornton* Court made extensive findings of fact regarding the employee and employer’s testimony at a hearing on reinstatement, ultimately concluding that the cluster of facts evidence reinstatement was infeasible. *Thornton*, 961 F.Supp. at 1435–36. But the facts in the instant case are not at all aligned with those in *Thornton*. As a threshold matter, the Court did not conduct a hearing for the purpose of gathering present impressions of the level of hostilities between the parties *after* the jury verdict. Indeed, the *Thornton* Court made clear that its assessment of present “hostilities” was crucially informed by evidence and observations taken from that hearing. *Thornton*, 961 F.Supp. at 1439. Additionally, the specific kinds of hostilities present in *Thornton* are not evidenced here. For example, Tudor has not testified to being apprehensive about returning to



hostility” test. Rather, *Prudential* recognizes in *dicta* the longstanding rule that reinstatement may only be denied where there is evidence that the employer exhibits “such *extreme hostility* that, as a practical matter, a productive and amicable working relationship would be impossible” and the employee does not wish to return (763 F.2d at 1172) (emphasis added). In this case, there is no evidence of extreme hostilities and Tudor wants to return.

Other Tenth Circuit precedents make clear that the high mark of “extreme hostility” is not met with just a finding of “some evidence of hostility” (Op. at 3). For example, *Spulark v. K Mart Corp.*, 894 F.2d 1150, 1157 (10th Cir. 1990) observes that the existence of extreme hostilities can be divined only where the employee opposes returning and she testifies that she would be unable to function if she returns. *Fitzgerald v. Sirloin Stockade, Inc.*, 624 F.2d 945, 957 (10th Cir. 1980) teaches that reinstatement is only to be denied where there is clear evidence of a “high degree of magnitude” of hostility. *Fitzgerald* clarifies that such hostilities are shown where the employee proffers evidence that the employer engages in “psychological warfare” against her, that retaliation is inevitable upon her return, and she

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Southeastern, the persons responsible for discriminating and retaliating against Tudor are no longer in the workplace, Tudor is not afraid that persons whom testified on her behalf at trial face retaliation from the current administration, Tudor does not harbor distrust of the present administration, and no Southeastern personnel have proffered sworn testimony to the Court indicating that they plan to retaliate against or otherwise harm Tudor if she returns.

does not ultimately wish to return (*id.*). None of those conditions are met here.

***Employee’s frustrations with employer arising in post-termination legal proceedings cannot preclude reinstatement.*** The Opinion is also premised on the holding that there are supposed hostilities apparent in briefs, for which Tudor may bear some responsibility, and, as a result, deems reinstatement unavailable. *See Op.* at 3. That holding conflicts with *Medlock v. Ortho Biotech, Inc.*, 164 F.3d 545, 555 (10th Cir. 1999), which teaches that post-termination conduct of the employee in the heat of legal proceedings cannot limit equitable relief. Therein, the Tenth Circuit held that even though the employee physically assaulted and swore at the employer at a post-termination legal proceeding, that outburst is no reason to limit relief. *Id.* Indeed, the *Medlock Court* went on to observe that any contrary rule is unworkable given that “[i]t is not difficult to envision a defendant goading a former employee into losing her temper, only to claim later that certain forms of relief should be unavailable because it would have discharged the plaintiff based on her temper.” *Id.* at 555 n.7. Under *Medlock*, Tudor’s briefs cannot be a bar to reinstatement.

***Employer’s beliefs about employee’s merit are immaterial once the Title VII violation has been proven.*** The Opinion also holds that because reinstatement is infeasible because Defendants represent that they believe



Tudor’s “teaching abilities and academic pursuits . . . do not rise to the level which would warrant a tenured professorship at Southeastern” (Op. at 3). This is error. Defendants’ beliefs concerning Tudor’s desert of tenure are legally immaterial. If the rule was otherwise, all a recalcitrant employer would have to do to forever lock out victims of discrimination is double down on its disproved nondiscriminatory rationale, which frustrates the purpose of Title VII. *See, e.g., Jackson*, 890 F.2d at 233 (citing with approval reasoning from *Reeves v. Claiborne Cnty. Bd. of Educ.*, 828 F.2d 1096, 1106 (5th Cir. 1987), that to do otherwise would “give credence to deception”).

### III. EQUITABLE CONSIDERATIONS

Dr. Tudor also respectfully brings to the Court’s attention equitable considerations which warrant reconsideration and, ultimately, reinstatement.

*Defendants should be judicially estopped from using the Collin College record to preclude reinstatement.* The Opinion relies on Defendants’ representation that they deem Tudor’s Collin College record to prove she is a “bad teacher,” which they claim justifies their original illicit decisions *and* makes reinstatement impossible. (Op. at 3–4). Defendants’ argument is, by definition, one of after-acquired evidence. *McKennon v. Nashville Banner Pub. Co.*, 513 U.S. 352, 362 (1995) (defining after-acquired evidence as evidence which the employer lacked at the time of the illicit employment

action but later uses to contest award of reinstatement once liability is proven).

But Defendants' cannot use Tudor's Collin College record to this end. Defendants previously took the litigation position that they have no after-acquired evidence and will not use the Collin College record as such.<sup>13</sup> Defendants' past representations to this Court are the exact situation in which the equitable doctrine of judicial estoppel is applied. *See, e.g., Eastman v. Union Pacific R. Co.*, 493 F.3d 1151 (10th Cir. 2007) (*quoting New Hampshire v. Maine*, 532 U.S. 742, 749–50 (2001) (doctrine's "purpose is to protect the integrity of the judicial process by prohibiting parties from deliberately changing positions according to the exigencies of the moment"). Thus, Tudor's Collin College record cannot be a factor in the reinstatement decision.

***Tudor should be protected, not punished.*** The Opinion is premised in part on the judgment that it is better to withhold reinstatement from Tudor than to risk her return precipitating new litigation. Op. at 4. But prophylactically denying Tudor the job that discrimination deprived her of stands equity on its head. Tudor does not desire more litigation, she just wants her job back. *See Ford Motor Co. v. EEOC*, 458 U.S. 219, 230 (1982)

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<sup>13</sup> *See, e.g.,* ECF No. 213 at 2 ("Defendants have been consistently candid about the fact that they are not in possession of any after-acquired evidence."); *id.* (responding to Tudor's request to exclude the Collin College record from evidence that it is not "after-acquired evidence").



(“Title VII’s primary goal, of course, *is* to end discrimination; the victims of job discrimination want jobs, not lawsuits.”). Ultimately, it is Defendants that bear the responsibility of preventing future Title VII violations, and it is Tudor’s obligation to report those violations. *See generally Burlington Industries, Inc. v. Ellerth*, 524 U.S. 742 (1998).

If this Court has found evidence that Defendants are prone to violate Title VII again, the correct, equitable result is for the Court to exercise its expansive powers and take steps to protect Tudor upon her return, not to acquiesce to Defendants’ proclivity for wrongdoing. *See Brown-Crummer Inv. Co. v. City of Purcell*, 128 F.2d 400, 404 (10th Cir. 1942) (“A court of equity is a forum of conscience. It acts when and as conscience commands. It exacts of those coming within its portals and applying for relief that they come with clean hands and right conduct.”).

*Students should not be shielded from truth.* The Opinion is also premised on the judgment that Southeastern’s students would suffer if Tudor returns given the Opinion’s assumption that “hostilities” between Tudor and Defendants harm the students (Op. at 3). But equity does not support shielding Southeastern’s students from Tudor or the consequences of this litigation.

First, equity seeks truth rather than evasion. *See, e.g., Tidewater v. Dobson*, 195 Or 533, 577 (Or. 1952) (*en banc*). Tudor’s return to campus will

inevitably draw attention to Defendant's past misdeeds. What happened to Tudor is regrettable, shameful, and ultimately illegal. But these hard truths are not something this Court should spare Defendants from, let alone help Defendants hide from the students.

Second, equality is equity. *Green v. Biddle*, 21 U.S. 1, 26 (1823). This ancient wisdom teaches that all persons similarly situated should be treated equally. This maxim commands that the Court treat the interests of the innocents involved—Southeastern's students and Tudor—as equals and not sacrifice the needs of one for the other (*id.*). Here, Tudor and the students have aligned interests—they desire to be free from unlawful interference and to be part of a safe, peaceful university community. The Court need not deny Tudor reinstatement in order to protect the students. For instance, the Court can craft conditions of reinstatement that ensure Tudor is protected and fully reintegrated into the workplace and the students are apprised of their rights to be free from illicit acts. *See Jackson*, 890 F.2d at 235 (indicating district court should carefully craft “conditions” of reinstatement to prevent problems rather than deny reinstatement).

Third, equity sees that what is done is what ought to be done. *See Owens v. Continental Supply Co.*, 71 F.2d 862, 863 (10th Cir. 1934). The jury found that Dr. Tudor earned tenure (ECF No. 262 at 1). Workplace discrimination is an all too common phenomena—many of Southeastern's



students will regrettably experience it or be in a position to remedy it themselves one day. Tudor deserves to get her job back at Southeastern, and the students will benefit from her return. Tudor's return will teach Southeastern's students that our nation's employers must remedy long-festering wrongs. It will also teach the students that victims of employment discrimination have the full force of our courts to make wrong, right. Conversely, denying reinstatement teaches the wrong lessons. It sends the message that the students are too fragile to be part of righting a wrong. It also signals that some wrongs need never be righted.

#### **IV. SUBSTANTIAL CHANGE IN CIRCUMSTANCES**

In the Opinion, the Court held that Defendants' purported concern about the frequency of Tudor's scholarly activities (Op. at 4) is reason to deny reinstatement. The undersigned attests to the following: On February 8, 2018, Dr. Tudor submitted a 27-page scholarly article entitled "Exiles in Our Own Land: Native American Novelists" for consideration to a well-regarded peer review journal. Additionally, Dr. Tudor has written and will submit a proposal titled "Unconquered and Unconquerable," for inclusion in a forthcoming anthology under contract with the University of Colorado Press the week of February 12, 2018. Dr. Tudor also plans to submit a presentation proposal for an upcoming academic conference (held at Southeastern) the week of February 12, 2018.

Dated: February 9, 2018

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

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

**ORDER**

Plaintiff seeks reconsideration of the Court's Order denying her request for reinstatement. Every issue raised by Plaintiff's Motion was considered and rejected by the Court in its Order denying her request for reinstatement. Accordingly, her request will be denied.

Plaintiff also seeks additional time to address the issue of front pay. Plaintiff requests an additional 30 days from any Order resolving her Motion to Reconsider. Plaintiff will be granted additional time, but not 30 days.

Plaintiff's Motion for Reconsideration (Dkt. No. 276) is DENIED. Plaintiff's Motion to Extend Briefing Deadline (Dkt. No. 277) is GRANTED in part. Plaintiff shall file any request for front pay within 15 days of the date of this Order.

IT IS SO ORDERED this 12th day of February, 2018.

  
ROBIN J. CAUTHRON  
United States District Judge

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  
MOTION AND INCORPORATED BRIEF IN SUPPORT OF  
RECONSIDERATION OF REINSTATEMENT OR,  
ALTERNATIVELY, FOR FRONT PAY**



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Dr. Tudor respectfully requests that the Court reconsider reinstatement as a remedy given new evidence. If reinstatement is still deemed infeasible, Tudor alternatively requests that she be awarded front pay to compensate her for the total loss of her professional career.

#### **I. Reconsider Reinstatement In Light of New Evidence<sup>1</sup>**

There is newly available evidence that shows Tudor’s healthy reunion with Southeastern is possible.

On February 20, 2018 Tudor was invited by Southeastern’s chapter of the American Association of University Professors (“AAUP”) as a special guest to give a presentation entitled “The Faculty Appellate Committee’s Role in Assuring Equity in Academic Freedom and Shared Governance” at AAUP’s statewide conference held at Southeastern in March 2018 (Exhibit 3 (a)–(b)). (A true copy of Tudor’s proposal is attached as Exhibit 1.)

The AAUP Oklahoma conference is one of Southeastern’s flagship events (Exhibit 4 ¶ 4(b)). The conference is a statewide covering of AAUP hosted by Southeastern, and brings together the Southeastern community and special guests to explore themes in faculty governance and welfare. This

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<sup>1</sup> Because a final judgment has not yet been entered in this case, the Court has general discretionary authority to review and revise its earlier Order denying reinstatement (ECF No. 275). *See, e.g., White Oak Global Advisors, LLC v. Pistol Drilling, LLC*, 2015 WL 11236850 at \*1 (W.D.Okla.) (Cauthron, J.) (*citing Wagoner v. Wagoner*, 938 F.2d 1120, 1122 n.1 (10th Cir. 1991)). Under these circumstances, the Court “is not bound by the strict standards for altering or amending a judgment encompassed in Federal Rules of Civil Procedure 59(e) and 60(b).” *Id.*



year, Dr. Tudor shares the honor of presenting at this prestigious event along-side her other respected Southeastern colleagues, including President Burrage, former President Snowden, and Dr. Meg Cotter-Lynch. (A true copy of the AAUP conference schedule showing Tudor as an invited featured speaker is attached as Exhibit 2.)

The Opinion denying reinstatement (ECF No. 275), hinges on the finding of fact that the Southeastern faculty will be hostile towards Tudor's return (*id.* at 4), that healthy relationships between Southeastern and Tudor are impossible due to this litigation (*id.* at 3), that the Southeastern faculty believe Tudor is a bad teacher (*id.* at 3), and that Tudor's mere presence on campus is impossible because Tudor would be made to feel "unworthy" by the Southeastern faculty (*id.* at 4). The new evidence upends the Opinion's calculus.

Southeastern's invitation to Tudor puts to rest any doubt as to the faculty's feelings towards Tudor and their true assessment of her credentials and worth. The faculty has warmly welcomed Tudor back to campus to present (and *teach* them), evidencing Tudor's contributions are desired by Southeastern (Exhibit 4 ¶ 4(f)). Obviously, if the faculty had serious concerns about Tudor's merit, teaching, temperament, or collegiality or simply did not want her back, they would not have extended the invitation. The invitation is also proof that the faculty do not fear addressing Tudor's

past tenure experience head-on. Indeed, Tudor's presentation touches on the very same faculty appeals process she utilized while contesting the discriminatory and retaliatory tenure decisions in the 2009-10 and 2010-11 cycles (see generally Exhibit 1).

The invitation is also probative of the fact that both Southeastern and Tudor presently have the capacity and desire to mend relations. Based on her desire to contribute to Southeastern and her trust in the faculty, Tudor voluntarily submitted her presentation proposal. Southeastern returned Tudor's gesture with an olive branch, extending Tudor an invitation to present (Exhibit 4 ¶ 4(d)). This is the stuff of reconciliation and healing, not unbridled hostilities.

Lastly, the invitation is confirmation that there are no present hostilities at Southeastern that bar reinstatement. The invitation shows that both sides have the capacity to work together on a major conference. This is the exact sort of healthy work-relationship that will ensure that Tudor's reinstatement is a success. Coupled with the jury's finding that there was no hostile work environment<sup>2</sup> (ECF No. 262 at 1), the invitation makes clear

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<sup>2</sup> The jury's determination that there was no hostile environment in the past is binding on this Court when it assesses the propriety of reinstatement. Though reinstatement (and front pay) are equitable remedies wholly within the Court's discretion, the jury's implicit factual findings and Tudor's Seventh Amendment rights preclude the Court making a finding of fact that conflicts with those implicitly made by the jury. *See Smith v. Diffe Ford-Lincoln-Mecury, Inc.*, 298 F.3d 955, 965 (10th Cir. 2002) ("We have previously held that when legal and equitable



that Tudor is welcome on campus (Exhibit 4 ¶ 4(e)) and there are thus no legitimate impediments to reinstatement at this time.

Because the Court did not previously have the benefit of this new evidence, reconsideration of reinstatement is appropriate. *Cf. Snell v. Ashbury*, 792 F.Supp. 718 (W.D.Okla. 1991) (Cauthron, J.) (new argument not available at time of original summary judgment order supports reconsideration). *See also* ECF No. 278 (denying reconsideration of reinstatement on the premise that no new arguments or evidence were presented).

## II. Alternatively, Award Tudor Front Pay

Though Dr. Tudor strongly desires reinstatement, if the Court denies reconsideration, Tudor respectfully asks that she be awarded front pay in the amount of \$2,032,789.51 to compensate her for the total loss of her future career earnings.<sup>3</sup>

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issues to be decided in the same case depend on common determinations of fact, such questions of fact are submitted to the jury, and the court in resolving the equitable issues is then bound by the jury's findings on them."); *Brinkman v. Dep't of Corrections*, 21 F.3d 370, 372–73 (10th Cir. 1994) ("We have held that when fact issues central to a claim are decided by a jury upon evidence that would justify its conclusion, the Seventh Amendment right to a jury trial prohibits the district court from reaching a contrary conclusion.") Thus, the Court cannot premise denial of reinstatement on a finding that past hostilities continue to preclude Tudor's return to Southeastern since the jury found there was not a hostile environment in the first place.

<sup>3</sup> Dr. Tudor respectfully preserves for the record that she continues to desire reinstatement as an Associate Professor with tenure at Southeastern Oklahoma State University rather than front pay. The instant motion should not be construed

**A. If reinstatement is infeasible, front pay is appropriate.**

Dr. Tudor respectfully requests front pay so that she may be made economically whole. “Front pay is simply money awarded for lost compensation during the period between judgment and reinstatement or in lieu of reinstatement.” *Abuan v. Level 3 Comm., Inc.*, 353 F.3d 1158, 1176 (10th Cir. 2003) (cleaned up). Front pay will ultimately return Dr. Tudor “as nearly as possible to the economic situation [s]he would have enjoyed but for the defendant[s]’ illegal conduct.” *EEOC v. Prudential*, 763 F.2d 1166, 1171–72 (10th Cir. 1985).

Front pay is proper in this case if Dr. Tudor’s preferred remedy of reinstatement has been denied due to Defendants’ hostilities. In such a situation, “front pay as a substitute for reinstatement is ‘a necessary part of the ‘make whole’ relief mandated by Congress’. . . .” *Abuan*, 353 F.3d at 1176 (quoting *Pollard v. E.I. du Pont de Nemours & Co.*, 532 U.S. 843, 846 (2001)).

**B. Calculation of Front Pay**

Under Tenth Circuit precedent, front pay should be calculated by assessing “work life expectancy, salary and benefits at the time of termination, any potential increase in salary through regular promotions and cost of living adjustment, the reasonable availability of other work

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as Tudor conceding she is not entitled to reinstatement nor construed as evidencing that Tudor no longer desires reinstatement.



opportunities, the period within which the plaintiff may become re-employed with reasonable efforts, and methods to discount any award to net present value.” *Deboll v. Webb*, 194 F.3d 1116, 1144 (10th Cir. 1999).

Any uncertainties in calculation should be construed in Tudor’s favor. *Abuan*, 353 F.3d at 1180 (quoting *Prudential*, 763 F.2d at 1173 (“[T]he mere fact that damages may be difficult of computation should not exonerate a wrongdoer from liability. The most elementary conceptions of justice and public policy require that the wrongdoer shall bear the risk of the uncertainty which his own wrong has created.”)); *Metz v. Merrill Lynch*, 39 F.3d 1482, 1494 (10th Cir. 1994) (“uncertainty in determining what an employee would have earned but for discrimination should be resolved against the employer”) (cleaned up); *id.* (employee’s own testimony regarding front pay damages is adequate evidence to support claim).

Using the formula prescribed by *Webb*, Tudor should be awarded front pay in the amount of \$2,032,789.51. In support of this request, Tudor proffers the following:

(1) ***Work life expectancy.*** If the Court were to hold an evidentiary hearing to determine front pay, Dr. Tudor will testify that if she had been reinstated, she planned to work until at least the age of seventy-five (see Exhibit 3 ¶ 5(c)). Dr. Tudor is currently fifty-four years old, and will turn seventy-five in July 2039, which should fall towards the end of

Southeastern's 2039 Summer term (*id.* ¶ 5(d)). Thus, the appropriate period of front pay is approximately twenty-one years, measured from the date of the jury verdict (November 20, 2017) through July 2039.

**(2 and 3) *Salary and benefits at termination and expected promotions and adjustments.*** Because Tudor was terminated by Southeastern in connection with their illicit denial of her promotion and tenure, Tudor's front pay base salary and benefits should be calculated as if Tudor had not been denied tenure and promotion *rather* than based upon what Tudor was paid at the time of her termination in May 2011.<sup>4</sup> *See, e.g., Abuan*, 353 F.3d at 1179–80 (front pay should be calculated based on likely promotions and pay bumps that would have occurred but for discrimination and retaliation rather than most recent salary). Southeastern's current "salary card" and benefits spreadsheet, both of which have been authenticated by Dr. Cotter-Lynch, is the starting point for computing front pay. *See* Exhibit 4 ¶ 5(a) (authenticating salary card, attached thereto as Exhibit A); *id.* ¶ 7(a) (authenticating benefits spreadsheet, attached thereto as Exhibit B).

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<sup>4</sup> At the time of her termination in May 2011, Southeastern paid Tudor an annual salary of \$51,279 per year not accounting for summer courses, class overages, traditional and professor benefits, or retirement (Exhibit 3 ¶ 6). Tudor's base salary was computed on "salary card," wherein her degree, seniority (termed "experience"), and rank were key factors. *Id.* If Tudor had not been illicitly denied tenure, her salary would have, at the very least, closely tracked that of Dr. Cotter-Lynch (Exhibit 4 ¶ 9).



The difference in compensation due to Tudor based on accumulating seniority and likely promotions is significant. Had Tudor remained at Southeastern, she would have received an additional \$546 in base salary each academic year in recognition of her accruing seniority. Upon promotion from Assistant Professor to Associate Professor, Tudor would have seen a base salary bump of \$3,036 (the difference between the base rate of the two ranks). Continuing onward, Tudor would have eventually seen another base salary bump of \$4,680 upon promotion from Associate Professor to Full Professor (the difference between the base rate of the two ranks).

Additionally, Tudor would have likely been given opportunities to take on administrative duties at Southeastern, also resulting in a significant salary bump. Administrative duties are compensated at a rate of \$2,190 plus 10% of base salary per year (Exhibit 4 ¶ 6(a)). If an evidentiary hearing were held, Tudor would testify that she would have taken on administrative duties, and held onto them for a period of at least ten years (Exhibit 3 ¶ 8(d)), which is reasonable and on par with others at Southeastern (Exhibit 4 ¶ 10(e)).

Tudor would also have had the opportunity to teach summer courses and class overages, both of which significantly boost salary. Most tenured professors at Southeastern have the opportunity to teach summer courses, which are compensated at a rate of \$3,700 per course (Exhibit 4 ¶ 6(b)(iii)).

Additionally, most tenured professors also have the opportunity to teach class overages—an extra class beyond the required four during the Fall or Spring terms—which are compensated at a rate of \$2,100 per course (*id.* ¶ 6(b)(ii)). If an evidentiary hearing were held, Tudor would attest that she would have at the very least taken on one class overage and one summer course per year (Exhibit 3 ¶(b)–(c)).

Lastly, the retirement contributions Tudor would be due from Southeastern are significantly affected by the above noted adjustments to her base salary. Under Southeastern’s current benefit scheme, Southeastern contributes 7% of all wages and fringe benefits that exceed \$25,000 per year. See Exhibit 4 at appended Exhibit B. Thus, as Tudor’s projected salary increases, so too do Southeastern’s contributions increase.

**(4) *Unavailability of other opportunities.*** Front pay is usually adjusted downward to allow for expected mitigation of damages where it is likely that the plaintiff will find new employment. However, front pay should not be reduced where there is record evidence that mitigation is improbable. See *Webb*, 194 F.3d at 1144–45 (duration of front pay shall be period needed to make employee whole given their unique difficulties finding comparable work). See also *Cox v. Shelby State Cmty. Coll.*, 194 Fed.Appx. 267, 266–77 (6th Cir. 2006) (awarding professor front pay for remaining work life expectancy because it was unlikely to find comparable employment). Here,



there is considerable evidence that alternative, comparable employment opportunities are unavailable to Tudor, and thus compensating Tudor for the rest of her work life expectancy is appropriate.

Trial testimony and other evidence shows that, despite diligent efforts, Tudor has no chance of obtaining a tenured professorship at any other institution. Dr. Parker's and Dr. Cotter-Lynch's testimony shine a light on the double-bind Tudor finds herself in. Most schools will deem Tudor's tenure denial from Southeastern as disqualifying her for tenure-track jobs (Exhibit 17 at 332–33). Even if a school does not deem the tenure denial disqualifying, given Tudor's long work history at Southeastern, she will be deemed *too advanced* for tenure-track jobs (Exhibit 17 at 277). Logically, because Tudor cannot get any tenure-track job, she has no means of securing a job equivalent to the one the jury held she was illicitly denied.

Testimony from current and former Southeastern employees aligns with Parker's testimony. For example, Dr. Scoufos testified that tenure denial and ejection from one university almost always marks the end of one's career as a university professor and ruins a professor's professional reputation (Exhibit 18 at 596). Dr. Spencer also testified that denial of tenure puts one's entire career in jeopardy (Exhibit 19 at 437; *id.* at 434).

Tudor's mitigation efforts also evidence that it is unrealistic for her to obtain an equivalent tenured position at another university. Since her

termination from Southeastern in May 2011, Tudor has applied to more than one-hundred universities and colleges, seeking tenure-track positions where available (see, e.g., Exhibit 3 ¶ 4(b); Exhibit 5). In roughly eight years of searching for a job, Tudor was only able to obtain one year-to-year contract position with Collin College, a two-year community college that does not offer tenure (Exhibit 3 ¶ 4(b)). Tudor continued to apply for tenure track jobs while she was at Collin College and after Collin non-renewed her contract (*id.*). Tudor also continued to apply for new jobs and follow up on other outstanding applications after the trial (*id.* ¶ 3(a)). Unfortunately, Tudor's diligent efforts have not panned out.

This litigation itself also makes Tudor's prospects of future employment all the more improbable. Though the Southeastern faculty continues to support Tudor's return, Defendants (or rather, their counsel) have bombarded the public sphere with unfounded attacks on Tudor's credentials, work ethic, and character which make it impossible for her to get a fair review by new employers.

Relatedly, despite the jury verdict, Defendants have doubled-down on their defense (rejected by the jury) that Tudor never merited tenure at Southeastern (see generally ECF No. 270), making it impossible for Tudor to overcome that "black mark" on her record. If Defendants admitted their misdeeds, perhaps Tudor could use that admission to convince a new

employer to take a chance on her. But, to date, Defendants steadfastly insist that they neither admit fault nor allow Tudor to return to the job she earned at Southeastern. In effect, Defendants' litigation position unjustly deprives Tudor of any prospect of a future in her profession.

Defendants' (and their counsel's Office's) outsized control on the pertinent job market also evidences that Tudor has no real prospect of future employment. Tudor was born in Oklahoma and received her doctorate from the University of Oklahoma (Exhibit 3 ¶ 4(d)(ii)). Persons with Tudor's background, roots, and school-network predominantly live and work in Oklahoma (*id.*). Even though Tudor has cast a wide net, her best chance of a new job is at a university in Oklahoma (*id.* ¶ 4(d)(iii)). But finding such a job is impossible under these circumstances.

Absent injunctive relief, Defendants' counsel have made clear that they hold Tudor's complaints at Southeastern and this very litigation against her.<sup>5</sup> They have even gone so far as to proclaim that Tudor is unfit to teach anywhere,<sup>6</sup> spuriously maligned Tudor's character,<sup>7</sup> and advised that they

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<sup>5</sup> See, e.g., ECF No. 270 at 14–15 (arguing that Tudor's invocation of her Title VII rights damaged the Southeastern community because of “side-choosing engaged in by university employees even before Dr. Tudor's separation”); *id.* at 15 (accusing Tudor of being unable to “address work conflicts without resorting to crying discrimination, (as evidence by her accusations and filings at [] Southeastern)”).

<sup>6</sup> See, e.g., ECF No. 270 at 21 (“she should not be teaching in higher education”); ECF No. 274 at 8 (arguing Tudor is not “fit to teach in a classroom”).

<sup>7</sup> See, e.g., ECF No. 270 at 17 (“her deliberate deceptiveness and lack of honesty”).



perceive Tudor to be too old to merit an equivalent job to the one she held at Southeastern.<sup>8</sup> Given those statements and others, it is exceedingly unlikely that if Tudor applies for jobs within the reach of the State of Oklahoma that she will be given a fair chance to prove herself. Moreover, it remains exceedingly unlikely that schools not directly controlled by the State of Oklahoma will ignore the admonishment from the Attorney General's Office—one of the most powerful and prominent divisions of the State—that Tudor is unworthy of hire.

Given the foregoing, awarding Tudor twenty-one years of front pay is appropriate. Long periods for an award of front pay are not unusual where, as is the case here, opportunities for a plaintiff to find an equivalent job are limited. *See, e.g., Passantino v. Johnson & Johnson Consumer Products, Inc.*, 212 F.3d 493, 511–12 (9th Cir. 2000) (approving twenty-two (22) years of front pay to compensate employee for remainder of work life expectancy); *Padilla v. Metro-North Commuter R.R.*, 92 F.3d 117, 125 (2d Cir. 1996) (approving twenty-years of front pay to compensate employee for remainder of work life expectancy where reinstatement deemed impossible because of hostilities and unlikely that comparable position available with another employer).

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<sup>8</sup> *See, e.g.*, ECF No. 274 at 1 (construing Tudor's age coupled with negative career trajectory Defendants themselves caused as justification to deny Tudor employment).

(5) *Discount award to net present value.* Tudor has reduced the requested front pay to present value by adopting a modified net discount rate.

A net discount rate is a means to adjust a lump sum award, accounting for the difference that investing that award in the market makes as well as the effects of inflation will have on the net amount. To calculate the net discount rate, one takes the prevailing interest rate and subtracts from it the rate of inflation; the resulting figure is the net discount rate. The future lump sum is then multiplied by the net discount rate, thereby reducing the award by a value that approximates the effects of both inflation and investment. *Hoskie v. United States*, 666 F.2d 1353, 1355 n.2 (10th Cir. 1981) (explaining calculation method of net discount rate).

At present, the rate of inflation in the United States is 2.1%. Exhibit 6 (excerpt from Bureau of Labor Statistics report). At present, the prevailing interest rate on Treasury backed marketable debt is 2.004%. Exhibit 7 (U.S. Treasury report showing marketable debt at average of 2.004% as of December 2017). The difference between the rate of inflation and the interest rate is thus -0.096%.<sup>9</sup> If applied, this negative net discount rate will increase rather than reduce the lump sum award due to Tudor.

To ward off any potential of a windfall, Tudor requests that the Court adopt a modified net interest rate of +1.5% rather than -0.096%. A net

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<sup>9</sup> A negative net discount rate arises where, as is the case currently, interest rates exceed the rate of inflation, but not the rate of growth in wages.

discount rate of +1.5% falls within the range approved by the 10th Circuit in other cases, erring on the side of a lower rate of reduction based upon the evidence Tudor has submitted showing that she is actually entitled to a net interest rate of -0.096%. *See, e.g., Hull by Hull v. United States*, 971 F.2d 1499, 1511–12 (10th Cir. 1992) (observing that courts typically employ a 1–3% net discount rate).

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To assist the Court in its evaluation of Tudor’s front pay request, Tudor has prepared Exhibit 8, which computes the anticipated salary and benefits due to Tudor.

Exhibit 8 sets forth four scenarios allowing for different variables affecting Tudor’s projected income at Southeastern through the remainder of her work life expectancy. Tudor respectfully requests that she be awarded front pay as calculated under Scenario 1, amounting to a front pay award of \$2,032,789.51. Scenario 1 is appropriate because it assumes that Tudor works until the age of seventy-five, receives one additional promotion, teaches one summer and one overload course each year, and takes on administrative duties for a period of ten years. These conservative estimates of Tudor’s earning potential at Southeastern best approximate a fair salary trajectory for Tudor based upon her declaration testimony, that of Dr. Cotter-Lynch, and trends at Southeastern for persons similarly situated to Tudor.



Scenario 1 also aligns with the testimony of Dr. McMillan, who swore under oath that a tenured professorship at Southeastern is valued in excess of \$2 million. *See* Exhibit 9.

**C. Propriety of Front Pay Request**

*Amount is appropriate.* The requested amount captures the monetary value of Tudor's career at Southeastern if she had been reinstated and thus fairly compensates Tudor. The record evidence shows that Tudor stands no chance of becoming reemployed in an equivalent job in her field, save for reinstatement at Southeastern, and that Southeastern opposes reinstatement, preferring instead to "pay" Tudor to not return. *See, e.g.*, ECF No. 274 at 8 ("Monetary compensation is how our justice system works best to make parties whole."). Given the particular circumstances of this case, full compensation for the totality of Tudor's remaining career is appropriate.

*No evidence that Tudor would have been fired if she had remained at Southeastern.* It is possible that Defendants will argue that Tudor would have been terminated for cause if she had remained at Southeastern, and thus front pay should be limited. If Defendants make such an argument, it should be rejected.

In the course of this litigation, no evidence of Tudor's malfeasance or her inability to perform her duties at Southeastern has been uncovered. If Defendants nonetheless argue that they would have legitimately fired Tudor,

they must both proffer evidence of Tudor’s malfeasance *and* show that they fire others similarly situated to Tudor in similar circumstances. Defendants’ mere argument that they would have fired Tudor, absent both forms of evidence, is not enough to sustain a limitation on front pay. *See, e.g., Sellers v. Mineta*, 358 F.3d 1058, 1064–65 (8th Cir. 2004) (employer seeking limitation on front pay due to after-acquired evidence has burden of establishing that misconduct would, under employer’s actual employment practices, preclude reinstatement).

Any argument that Tudor would be unable to perform her job duties at Southeastern and thus front pay should be limited would also be without merit. The jury has finally resolved any questions about Tudor’s merit—she earned tenure in the 2009-10 cycle (ECF No. 262 at 1). That finding is wholly supported by the record. As to teaching, the best evidence available shows that tenured English Department faculty, including Drs. Mischo, Althoff, and Cotter-Lynch, attest to Tudor’s strengths as a teacher. *See generally* Exhibit 10 (collecting evidence of Tudor’s teaching at Southeastern, as evaluated by her peers). (Indeed, even discriminatory actors Drs. Scoufos<sup>10</sup> and McMillan<sup>11</sup>

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<sup>10</sup> In Exhibit 11, the back-dated letter Scoufos placed in Tudor’s 2009-10 tenure packet, Scoufos indicates that Tudor is a “generally effective classroom teacher” and teaching is not the purported reason for denying tenure. In Exhibit 12, Scoufos writes, “There is evidence that Dr. Tudor is an effective classroom teacher” and ranks Tudor’s teaching as “commendable.”

<sup>11</sup> In Exhibit 13, McMillan writes that “Dr. Tudor has provided sufficient evidence that she meets the expectation for tenure and promotion in the area of

previously admitted that they had no concerns about Tudor's teaching. Dr. Prus *also* testified that Tudor's teaching is "commendable" and merits tenure [Exhibit 15], and, during the only two classroom observations he conducted of Tudor, Prus lauded Tudor's exemplary classroom teaching [Exhibit 10 at PI00036 and PI00038]). As to scholarship, Tudor's eleven published peer review articles with more on the way (see Exhibit 3 ¶ 3(d)(ii)), are greater in both number and frequency than the publication records of other tenured professors in the English Department.

***No after-acquired evidence.*** It is possible that Defendants will argue that after-acquired evidence<sup>12</sup> bars or should limit front pay. But, Defendants should be judicially estopped from making that argument.

During discovery, in the lead up to trial, and at trial Defendants repeatedly told both Tudor and this Court that they do not have after-acquired evidence. *See generally* Exhibit 16 (collecting examples of Defendants' representations). Defendants should be bound to their past representations. If Defendants attempt to change their position, the Court should apply the equitable doctrine of judicial estoppel so as to preserve the

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effective classroom teaching." In Exhibit 14, a transcript of McMillan's 2012 interview with the EEOC, McMillan indicates that Tudor's teaching was adequate for tenure.

<sup>12</sup> After-acquired evidence is any evidence which the employer lacked at the time of the illicit employment action but later seeks to use to contest reinstatement or front pay after liability is proven. *McKennon v. Nashville Banner Pub. Co.*, 513 U.S. 352, 362 (1995).



integrity of this process. *See, e.g., Eastman v. Union Pacific R. Co.*, 493 F.3d 1151 (10th Cir. 2007) (*quoting New Hampshire v. Maine*, 532 U.S. 742, 749–50 (2001) (doctrine’s “purpose is to protect the integrity of the judicial process by prohibiting parties from deliberately changing positions according to the exigencies of the moment”).

***No windfall to Tudor.*** The requested amount would not give Tudor a windfall. If Defendants had followed the law, Tudor would have life tenure at Southeastern right now. Because Defendants broke the law, Tudor was pushed out into the job market in a vulnerable position, with no avenue to tenure elsewhere and otherwise bleak job prospects.

Tudor’s professional vulnerability is a problem of Defendants’ own making—they must now pay Tudor for the full price of her career. *See Abuan*, 353 F.3d at 1179 (employer’s illicit actions which thrust employee into vulnerable position in job market coupled with employer’s own hostilities precluding reinstatement bar opposition to make-whole front pay as a matter of law). Moreover, the requested award is appropriate because it seeks to return Tudor to the economic position she would have been in if Defendants had not violated Title VII. That is exactly the type of remedy Title VII demands. *Prudential*, 763 F.2d at 1173 (purpose of front pay is to assure that “the aggrieved party is returned to nearly as possible the economic situation [s]he would have enjoyed but for the defendant’s illicit conduct”).

## CONCLUSION

For all of the foregoing reasons, Dr. Tudor respectfully requests that the Court order that she be reinstated as a Associate Professor with tenure at Southeastern Oklahoma State University. In the alternative, if reinstatement is deemed infeasible due to Defendants' hostilities, Tudor respectfully asks that she be awarded \$2,032,789.51 in front pay.

Dated: February 27, 2018

/s/ Ezra Young  
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**CERTIFICATE OF SERVICE**

I hereby certify that on February 27, 2018, I electronically filed a copy of the foregoing with the Clerk of Court by using the CM/ECF system, which will automatically serve all counsel of record.

/s/ Ezra Young  
Ezra Young (NY Bar No. 5283114)



## DECLARATION OF DR. RACHEL JONA TUDOR

### 1. Reinstatement.

- a. I still desire to be reinstated as an Associate Professor with tenure at Southeastern Oklahoma State University (“Southeastern”). Reinstatement remains my preferred remedy.
- b. I sincerely believe that if I were reinstated that I would not encounter a hostile environment at Southeastern.
- c. I sincerely believe that this litigation has not poisoned the environment at Southeastern.
- d. I sincerely believe that Southeastern’s students would not be harmed if I returned.
- e. I sincerely believe that I am presently capable of performing all duties required of me as an Associate Professor with tenure at Southeastern.

### 2. AAUP Conference at Southeastern.

- a. The week of February 12, 2018, I submitted a proposal to give a presentation at an American Association of University Professor’s conference held at Southeastern. My proposal was titled “The Faulty Appellate Committee’s Role in Assuring Equity in Academic Freedom.”

- b. On or about February 20, 2018, I was notified via email that my proposal had been accepted and that I was invited to give my presentation at the conference.
- c. I plan to give my presentation at the Southeastern conference on the afternoon of March 10, 2018.
- d. I also plan to attend the other presentations scheduled at the conference, including those given by President Burrage, President Emeritus Snowden, and Dr. Cotter-Lynch. I have absolutely no fears or concerns about interacting with current Southeastern faculty and administrators at the conference. I have no reason to believe that current Southeastern faculty or administrators in attendance will be hostile towards me.
- e. I am heartened by the Southeastern AAUP chapter's invitation.
- f. I am also grateful for the opportunity to return to Southeastern and share with the broader community what I have learned about faculty appellate committees and the faculty's role in correcting breaches of protocol and rules that arise in the tenure process. I believe my presentation is timely and hope that my colleagues and the other invited guests enjoy it.

g. I sincerely believe that Southeastern AAUP's invitation is important evidence that the current Southeastern faculty and the administration do not harbor hostilities towards me.

**3. Efforts to mitigate damages after trial.** Since trial, I have continued to do my best to mitigate damages.

a. I have continued my job search. I regularly look for job openings on appropriate job boards, including but not limited to InsideHigherEd. I also regularly visit university websites to look directly for job announcements, including keeping abreast of postings at Southeastern Oklahoma State University and other similar schools. I also continue to remind persons in my network that if they learn of an appropriate job opening through their own channels that they pass the opportunity on to me so that I can apply.

b. I have submitted five new applications for employment for academic jobs at colleges and universities. I have also continued to follow up on job applications that I submitted prior to trial—at this time, there are still three applications outstanding from that batch.

c. I have also expended considerable efforts working to improve my application portfolio. For example, I have revised my template



cover letter to expressly alert hiring committees that the jury found that I was denied tenure at Southeastern in violation of Title VII, in hopes that this might help prospective employers understand that my Southeastern tenure denial and subsequent separation should not be held against me.

d. I have also continued to build up my credentials.

i. For example, I submitted a proposal to present at the AAUP conference at Southeastern, which was accepted, and will continue to seek out similar opportunities to give academic presentations this year.

ii. I have also continued to work on scholarship. Scholarly production is a time-consuming undertaking; many publications require several years of research and reflection before a manuscript is ready for submission. Though my resources are quite limited and I currently lack institutional support, I have done my best to work on scholarly projects, several of which are ready or near ready to be submitted this calendar year. In early February 2018, I submitted a 27-page scholarly article to a peer review journal—I have been notified that the article is currently winding its way through the peer review process. In early

February 2018, I also submitted a chapter for a forthcoming anthology under contract with the University of Colorado Press—I have been notified that a decision will likely be made sometime in late March 2018. I am currently in the process of completing a draft of another lengthy scholarly article, which I anticipate submitting for publication in the next few months. I also anticipate submitting a book review for publication in the coming months.

- iii. I am also in the process of exploring new outlets to serve my discipline and scholarly community. For example, in February 2018 I was invited to serve as a peer reviewer for a scholarly journal. As a peer reviewer, I would be asked to review articles submitted for publication and provide feedback to the journal editors based upon my expertise in the field. I will continue to seek out other similar service opportunities this calendar year.

**4. Likelihood that job search will be unsuccessful.**

- a. Though I know that I have strong credentials and a strong work ethic, I sincerely believe that my tenure denial from Southeastern has effectively killed my career. I also believe that

in all likelihood, my job search efforts will not result in an equivalent job.

- b. I have been looking for a job equivalent to the last position I held at Southeastern since 2011—approximately eight years. I have submitted hundreds of applications for jobs, and the only offer I got was from Collin College for a one-year contract that was, at Collin’s option, renewable.<sup>1</sup> While I worked at and after I lost my job at Collin, I continued my job search in hopes of finding a new tenure-track position. Despite my efforts, I have been unable to secure a tenure-track job equivalent to the last job I held at Southeastern.
- c. I also believe that my protected activities (including this litigation) has made it more difficult for me to find a job equivalent to the one I held at Southeastern. I am well aware that if my name is googled that most results will point to contemporary reporting on my struggles at Southeastern during

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<sup>1</sup> Though I enjoy teaching, the Collin job was not an equivalent to Southeastern—the salary and benefits trajectory was far less than Southeastern; there was no option to earn tenure; my job contract was nonrenewable each year at Collin’s option and no presumptive right to renewal; and Collin is a two-year college which meant that I was teaching only introductory level college courses whereas at Southeastern I could teach higher-level college and graduate level courses which is more appropriate given my credentials and training.



the 2010-11 academic year, the EEOC proceedings and Department of Justice investigation, and this litigation. This is a difficult predicament to navigate as a job candidate. In the few interviews that I have had between 2011 and present, I have been asked questions that directly and indirectly touch on these proceedings.

d. I believe I face considerable obstacles to finding any equivalent job in the future given my candidate profile.

i. As a practical matter, I am only a marketable candidate for English teaching jobs at the college level. I hold a doctorate in English literature and my work experience is limited to higher education and my work skills are not readily transferable to other professions.

ii. My background and roots somewhat limit me to finding a job in Oklahoma. I received my PhD from the University of Oklahoma and was born in and desire to live in Oklahoma. Additionally, I am an active citizen of the Chickasaw Nation, which is located in Oklahoma and I desire to live near the Nation. Additionally, my most significant professional job to date—the Assistant Professor position I held at Southeastern, a teaching university—was at an

Oklahoman teaching university. Most persons with my background ultimately find jobs in Oklahoma given that this is where our roots are and where our professional networks strongest.

- iii. While I have cast a wide net, my best chance for a job is still in Oklahoma at a teaching university. Unfortunately, I face a considerable disadvantage on the job market in Oklahoma. There are very few teaching universities in Oklahoma, and the Regional University System of Oklahoma (which I have sued), controls seven of the fifteen public universities that offer four-year degrees in the state and all of Oklahoma's public teaching universities. Though I have in the past and will continue to apply to all appropriate positions, including those at Southeastern and other RUSO schools, its apparent that I am effectively locked out of the pertinent Oklahoma university professor market.

#### **5. Work Life Expectancy.**

- a. I love teaching and being in the classroom. Being a tenured professor at Southeastern was and remains my dream job. I

intended to work as a tenured professor for the rest of my natural life.

- b. I have a healthy lifestyle. I have never smoked. I only rarely drink alcohol. I endeavor to regularly exercise; weather permitting, I take several lengthy bicycle rides each week and regularly take middle distance runs of between 1 and 3 miles. I maintain a healthy weight. Aside from gender dysphoria, I do not have any chronic illnesses and I am not aware of any chronic illnesses that run in my family. I had my most recent comprehensive doctor's check-up in December 2017. The doctor informed me that I had healthy blood pressure, healthy weight, no heart problems, and no other major ailments.
  - c. Given my passion for my profession and healthy lifestyle, I believe that I would have worked at Southeastern until I was at least 75 years old though, if given the opportunity, I would have strived to work well beyond that age.
  - d. I am currently 54 years old. I will turn 75 in July 2039, which should fall during Southeastern's Summer 2039 term.
6. **Southeastern Salary as of 2010-11 Academic Year.** During the last year of my employment at Southeastern, I was paid approximately \$51,279 in salary. I calculated this based on the following formula: Degree level



(\$38,215) + Rank (\$8,196) + Experience (\$4,368) + Merit bonus (\$500)<sup>2</sup>.

However, given that I should have been awarded promotion and tenure during the 2009-10 cycle, I should have been paid an additional \$3,036 (the pay increase due to promotion from Assistant to Associate Professor) in the 2010-11 academic year. Thus, my compensation in the 2010-11 academic year should have been \$54,315.

7. **Calculating Front Pay.** I have carefully reviewed motion Exhibit 8, a set of formulas and four tables mapping out my earnings trajectory if I had been reinstated at Southeastern from the date of the jury verdict through age seventy-five. I believe that Exhibit 8 accurately calculates my earning trajectory at Southeastern.

8. **Salary increases over time.** If I were reinstated at Southeastern, I would have seen additional salary increases over time, including but not limited to:

a. **Promotion to full professor.** I would have applied for, and believe that I would have merited, promotion from Associate to Full Professor in the 2021-22 cycle, and that promotion would have gone into effect in Fall 2022. Under Southeastern's current salary card, this promotion is rank comes with a salary bump of \$4,680.

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<sup>2</sup> I was honored with the Southeastern Faculty Senate's Excellence in Scholarship Award in Spring 2011. In recognition of this honor, Southeastern paid me a merit bonus of \$500.

- b. **Class overage.** I would have sought out opportunities to take on at least one extra class during the traditional Fall/Spring academic year.
- c. **Summer courses.** I would have sought out opportunities to teach at least one summer course during the summer session.
- d. **Administrative Duties.** I would have sought out opportunities to take on administrative duties. I took on administrative duties, I believe that I would have held onto them for at least ten years, if not longer.

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

Executed on (date) 2/27/18 in (location) Plano, Texas

Rachel Tudor  
Dr. Rachel Jona Tudor



# Exhibit 4

## DECLARATION OF DR. MEG COTTER-LYNCH

1. I am a full professor with tenure at Southeastern Oklahoma State University (“Southeastern”). As a full professor with tenure, I am considered a senior member of the English, Humanities, and Languages’ Department (“English Department”).
2. I am also the Director of Southeastern’s Honor’s Program. As Honors Director, I am considered both a member of Southeastern’s faculty as well as a member of the Southeastern administration.
3. I am also a member and former president of Southeastern’s chapter of the American Association of University Professors (“AAUP”). AAUP is a national nonprofit. AAUP’s mission is to advance academic freedom and shared governance; to define fundamental professional values and standards for higher education; to promote the economic security of faculty, academic professionals, graduate students, post-doctoral fellows, and all those engaged in teaching and research in higher education; to help the higher education community organize to make our goals a reality; and to ensure higher education’s contribution to the common good.
4. **AAUP Conference at Southeastern.**

- a. Southeastern's AAUP chapter is hosting a statewide conference on campus on March 10, 2018. The theme of this conference is "Values and the University: Academic Freedom and Shared Governance."
- b. This AAUP conference is a major and important convening for Southeastern—only one of two major conferences Southeastern regularly hosts on campus, and to which the entire Southeastern faculty is invited. The event draws invited speakers from other universities in Oklahoma as well as outside of the state. The event is funded in part by Southeastern and in part from funds received from AAUP's Assembly of State Conferences.
- c. It is my understanding that Southeastern's AAUP chapter put out a competitive call for proposals, seeking presenters for the conference. In response to that call, Dr. Tudor submitted a proposal which was subsequently accepted.
- d. I believe that Dr. Tudor's invitation to speak at the AAUP conference reflects the Southeastern faculty's support of Tudor as well as our desire for Tudor to rejoin our community.
- e. I believe that Dr. Tudor's invitation to speak at the AAUP conference is clear evidence that Tudor is welcome on the Southeastern campus.



f. I believe that Dr. Tudor's invitation to speak at the AAUP conference shows that the Southeastern faculty value Tudor and believe that Tudor can positively contribute to the Southeastern community.

**5. My current salary and benefits.**

a. For calendar year 2017, my Southeastern salary was \$75,072.69.

My total salary is calculated using Southeastern's "salary card" (a true copy is attached hereto as **Exhibit A**) plus I receive additional compensation for my administrative duties.

b. For calendar year 2017, I received "traditional fringe benefits" amounting to approximately \$7,916.52.

c. For calendar year 2017, I received additional "professor fringe benefits" amounting to at least \$6,328.87.

**6. Calculating current salary at Southeastern.**

a. **Card Salary.** Base salary at Southeastern is calculated through the "salary card" which is periodically revised. Factors pertinent to salary calculation are as follows: Degree level (A), Rank (B), and Experience (C). Additionally, Southeastern gives me additional compensation for performing administrative duties, which are currently calculated as follows: \$2,190 + 10% of the total of my other "salary card" components (Degree, Rank, and Experience).

b. *Above salary card compensation.* The Southeastern “salary card” sets forth basic compensation expectations. However, there are additional factors that may increase the ultimate salary paid to a professor. For example,

i. *Negotiating “above card” rates.* Southeastern’s “salary card” sets forth the baseline salary expectation at Southeastern. However, many Southeastern professors negotiate rates higher than the salary card for their baseline compensation. In my opinion, the “salary card” rate should be viewed as the *minimum* compensation level expected by Southeastern professors.

ii. *Class overloads.* The standard expectation is that Southeastern professors are required to teach four classes in the Fall and Spring semesters. However, professors can elect to teach extra classes, which is known as an “overload.” Southeastern pays professors with doctorate degrees \$2,100 per overload class. Many Southeastern professors take on overload classes to make extra money. It is not unusual for tenured professors at Southeastern to teach more than one overload class each academic year. In my opinion, it is reasonable to expect that a tenured Southeastern professor

who desires to will teach at least one overload class per academic year.

iii. *Summer classes.* Southeastern has a Summer term. Professors that elect to teach summer classes are paid \$3,700 per class. Many Southeastern professors teach summer courses to make extra money. It is not unusual for a professor to teach one or two summer classes each year. For example, English Department professor Dr. Jani Barker regularly teaches three summer courses. In my opinion, it is reasonable to expect that a tenured Southeastern professor who desires to will teach at least one Summer course per academic year.

## 7. Calculating benefits at Southeastern.

a. *Traditional fringe benefits* are benefits that all full-time Southeastern employees receive, including health insurance, dental insurance, vision insurance, retirement contributions, and tuition assistance. Based on my knowledge of these benefits and documentation supplied to me by Southeastern's Human Resources office, including a summary sheet appended hereto as Exhibit B, I calculate the value of those benefits as follows: health insurance (\$6,645.72 per year); dental insurance (\$442.32 per



year); vision insurance (\$78.48 per year); and tuition assistance (\$750 per year). In addition, I receive other fringe benefits for which I do not know how to value, including but not limited to: retirement benefits, worker's compensation insurance, disability insurance, and unemployment insurance.

*b. Professor fringe benefits* are benefits that all Southeastern professors receive (but non-academic employees do not receive), including but not limited to desk copy books from publishers, user license for academic databases JSTOR and EBSCOhost, user license for Zoom conferencing, user license for five personal devices for Microsoft Office 365, conference and research travel support, university merit award bonuses, and institutional affiliation status which allows me to apply for external funding for specialized research and travel grants. I estimate that my professor fringe benefits for calendar year 2017 were as follows: desk copies (\$200), academic databases (\$3,099<sup>1</sup>), Zoom

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<sup>1</sup> I base this estimate upon the following: Southeastern maintains institutional licenses with both JSTOR and EBSCOhost, and all Southeastern professors are granted credentials to use these databases as a benefit of our employment. If I were to purchase a private JSTOR license (less content than Southeastern's license, but the only market option available), it would cost me \$99 per year. Unfortunately, EBSCO does not offer any private licenses. If I were to try to replicate the resources provided by EBSCO on the open market, I believe it would reasonably cost \$3000 per year. To replicate the EBSCO sources that I would typically use in a year, I would likely need to subscribe to at least 10 journals, buy at least 15 articles, and buy at

conferencing (\$179.88 per year), Microsoft Office 365 license (\$99.99 per year), Southeastern conference and research travel support (varies, but average is \$1,500 per year), university merit award bonuses (varies by year, but approximately \$500 in calendar year 2017), and external funding (varies, but average is \$750 per year).

#### **8. Work Life Expectancy at Southeastern.**

- a. There is no mandatory retirement age at Southeastern.
- b. Because there is no mandatory retirement age, many Southeastern professors choose to work into their seventies and beyond.
- c. Even after Southeastern professors retire from full-time teaching, many return to teach classes, which is an additional source of income on top of the retirement package provided by Southeastern. For example, President Emeritus Jesse Snowden is currently ~80 years old and retired from Southeastern in 2008, but he continued to teach classes at Southeastern until 2016. Additionally, Dr.

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least 20 books. In my discipline, most journals charge a yearly subscription of \$100 or greater, most journals charge between \$20 and \$70 per article (with a mean price of \$50 per article), and the mean of most books is \$50.

George Collier is in his 80s, has officially retired, but still teaches classes at Southeastern as an adjunct. There are other examples.

**9. Tudor's career at Southeastern should have matched my own.** If Dr.

Tudor had been given tenure during the 2009-10 or 2010-11 cycle, she would have followed a career trajectory similar to my own. Specifically, Dr. Tudor would have received salary increases, post-tenure promotions, and been invited to take on administrative duties near identical to the ones I have received.

**10. Likelihood that Tudor would have been offered administrative duties at Southeastern.**

a. Tenured professors at Southeastern are often given the opportunity to take on administrative duties. Administrative duties include, but are not limited to: department chair, center director, or program director.

b. My experience at Southeastern has been that most tenured faculty who take on administrative duties elect to keep them for approximately ten years.

c. After I received tenure, I have been offered several opportunities to take on administrative duties. I declined a nomination to run for Chair of the English Department in 2010, and I was appointed Honors Director in 2016.



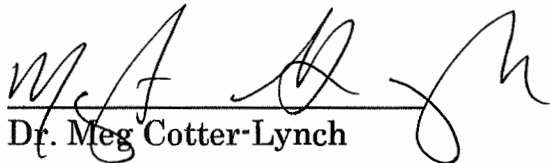
- d. I believe that if Dr. Tudor had stayed at Southeastern that she would have had similar opportunities to take on administrative duties.
  - e. I believe that if the Court had ordered that Dr. Tudor be reinstated at Southeastern that she eventually would have had the opportunity to take on administrative duties. I further believe that if Tudor had been offered the opportunity to take on administrative duties that she would have accepted them and held onto them for at least ten years.
11. **Likelihood that Tudor would have been promoted to Full Professor by 2021-22 academic year.**
- a. Professors at Southeastern are typically awarded tenure with the promotion to Associate Professor. Typically, Associate Professors in good standing are promoted to Full Professor within five to eight years of receiving tenure.
  - b. Based upon my understanding of the process of academic promotion at Southeastern, my personal experience going through the promotion process, I believe that if Tudor had remained at Southeastern that she would have been promoted to Full Professor around the same time I was promoted to that rank, in 2015.

c. If the Court had reinstated Tudor this academic year (2017-18), I think that Tudor would have successfully applied for and received promotion to Full Professor through the normal process no later than the 2021-22 academic year, with the promotion taking effect in Fall 2022.

12. **Valuing my career.** I believe that my tenured position at Southeastern should be valued somewhere between \$3.5 and \$4 million. I come to this estimate based on my understanding that Southeastern spends on my salary and benefits and the fact that tenured professors in my cohort (which Tudor was in) can reasonably expect to work around thirty years at Southeastern after receiving tenure as well as the total value of incidental benefits I receive from entities other than Southeastern due to my tenured status at Southeastern.

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

Executed on (date) 2/27/18 in (location) McKinney, TX

  
Dr. Meg Cotter-Lynch

# Exhibit A



## SALARY CALCULATION FORM 2015-2016 Full-Time Faculty

NAME: \_\_\_\_\_

DEPARTMENT: \_\_\_\_\_ SCHOOL: \_\_\_\_\_

### DEGREES/EXPERIENCE

### SALARY CALCULATION

**1. DEGREE STATUS**

- a. Highest Earned Degree? \_\_\_\_\_
- b. If answer to (a.) is Master's than number of hours above the Master's in the teaching field, relevant field, or on an approved Doctoral program? \_\_\_\_\_

**CALCULATION FOR DEGREE:**

Less than master's .....	\$24,570
Master's .....	27,295
Master's + 15 hrs* .....	30,025
Master's + 30 hrs* .....	32,760
Master's + 55 hrs* .....	35,490
Doctorate .....	38,215

**2. ACADEMIC RANK?** \_\_\_\_\_

- a. \_\_\_\_\_ Tenured (1)
- b. \_\_\_\_\_ On Tenure Track (2)
- c. \_\_\_\_\_ Not On Tenure Track (3)

\* Toward Doctorate (See Note 2)

A. \_\_\_\_\_

**3. EXPERIENCE (SEE NOTE 1)**

- a. Total Yrs. at SOSU in a full-time professional capacity? \_\_\_\_\_
- b. Yrs. at other colleges or univ.? \_\_\_\_\_  
 \_\_\_\_\_ / 2 (maximum 5 yrs.) \_\_\_\_\_
- c. Yrs. common school experience? \_\_\_\_\_  
 \_\_\_\_\_ / 2 (maximum 3 yrs.) \_\_\_\_\_
- d. Yrs. allowable service? \_\_\_\_\_  
 (a + b + c) \_\_\_\_\_

**CALCULATION FOR RANK:**

Instructor .....	\$4,098
Assistant Prof with Masters .....	6,558
Assistant Prof with Doctorate .....	8,196
Associate Prof .....	11,232
Professor .....	15,912

B. \_\_\_\_\_

**4. MISCELLANEOUS**

- a. Department Chair? \_\_\_\_\_
- b. CPA? \_\_\_\_\_
- c. Add-on? \_\_\_\_\_  
 If yes, attach detailed justification (requires President's approval)

**CALCULATION FOR EXPERIENCE:**

\$546.00 X (# of allowable years) (See Note 1)

C. \_\_\_\_\_

**ADD FOR DEPARTMENT CHAIR:**

(\$2,190)

D. \_\_\_\_\_

**ADD-ON:**

E. \_\_\_\_\_

**TOTAL SALARY (A+B+C+D+E)** \$ \_\_\_\_\_

**NOTE 1: Explanation:** The number of allowable years are computed as follows:

- a. Total number of years at SOSU in a full-time professional capacity.
  - b. One-half of the total number of years of full-time teaching experience at other colleges/universities up to five (5) years.
  - c. One-half of the total number of years of full-time teaching experience at the elementary or secondary level up to three (3) years.
- (Number of allowable years) = a + b + c. This sum is not to exceed the number of years allowed at each of the following academic ranks:
- |                           |           |
|---------------------------|-----------|
| Instructor .....          | 11 years  |
| Assistant Professor ..... | 14 years* |
| Associate Professor ..... | 19 years* |
| Professor .....           | 31 years* |

\*Includes years at lower ranks.

**NOTE 2:** Hours "toward Doctorate" means graduate hours in the teaching field, relevant fields, or on an approved doctoral program. These hours will be certified by the Department Chair, the Executive Dean of Instruction and the Vice-President for Academic Affairs.

Department Chair \_\_\_\_\_ Executive Dean of Academic Affairs \_\_\_\_\_

VICE PRESIDENT FOR ACADEMIC AFFAIRS \_\_\_\_\_

**GUIDE FOR APPLICATION OF THE SALARY CARD**

1. Upper-level undergraduate and graduate hours taken at SOSU after the Master's degree will not be counted as work toward the Doctorate unless the Doctoral Granting Institution documents in writing (letter, degree plan) that these hours will count on a specific degree program.
2. After a Master's degree has been completed, post master's graduate hours taken at SOSU in School Administration may be counted as hours toward a doctorate when these hours are directly related to the teaching assignment.
3. An MFA degree will be counted at the level of "Masters + 30" hours toward the Doctorate.
4. A Master's degree with a CPA will be counted at the level of "Master's + 30" hours toward the Doctorate.
5. Two Master's degrees will be counted at the level of "Masters + 15" hours toward the Doctorate when both degrees are relevant to the teaching assignment.
6. Part-time SOSU faculty who have taught 3/4 time or more during a semester will receive credit toward years of college teaching experience should they become full-time faculty.
7. Individuals with prior employment at SOSU in a non-teaching professional capacity will receive consideration toward years of college teaching experience. Typically, such employment has been coded in one of the following HEGIS categories:
  - 01--Executive Officers
  - 02--Directors of Units
  - 03--Administrators within Units
  - 06--Specialist Support (ex: Counselor, Librarian)
8. A paid sabbatical from SOSU counts toward SOSU teaching experience. Leave without pay does not count toward experience.
9. College-level teaching or administrative experience at other institutions will count only when it is documented to be a full-time faculty appointment. Post-doctoral experience at other institutions will count when it is documented to be a full-time appointment.
10. Elementary or secondary teaching experience will count only when it is documented to be a full-time appointment.
11. On the Salary Schedule, Under "3. EXPERIENCE", parts a, b, and c will be computed using increments of one-half (.5).

# Exhibit B



**BENEFIT PROGRAMS FOR EMPLOYEES OF SOUTHEASTERN OKLAHOMA STATE UNIVERSITY**

Appellate Case: 18-6102 Document: 010110085922 Date Filed: 11/19/2018 Page: 216

This information was developed by University Human Resources (HR) for the convenience of SE employees. It is a brief interpretation of more detailed and complex materials. If further clarification is needed, the actual law, policy, plan document, or contract should be consulted as the authoritative source. Co-pay varies with each plan. All health care providers (health, vision & dental) must be selected from a provider list for optimum benefit. SE continually monitors benefits and reserves the right to update benefit information sheet as necessary.

BASIC BENEFITS	WHO IS ELIGIBLE	WHEN TO ENROLL	SE PAYS (Cost Per Month or Annually)	EMPLOYEE PAYS (Cost Per Month)	COVERAGE PROVISIONS &/or EFFECTIVE DATE (Outline)		
<b>Health Care</b> Blue Cross Blue Shield of Oklahoma BlueChoice PPO  <b>Red Plan</b>	Reg. Full Time Employees with 75% FTE	You have 30 days from your entry on duty date to elect coverage for yourself & your eligible dependents. Otherwise, you may enroll or add coverage only during Option Period Enrollment in the fall.	Premium \$623.07 SE Pays \$553.81 for employee coverage  <b>Employee Pays \$ 69.26</b>	<b>Employee \$69.26</b>  Child \$249.35 + \$69.26 = \$318.61 Children 498.60 + \$69.26 = \$567.86 Spouse 654.34 + \$69.26 = \$723.60 Spouse & Child(ren) \$1152.84 + \$69.26 = \$1222.10	Comprehensive health care insurance with prescription benefit, PPO; \$1000 annual individual deductible/\$3000 family, calendar year. Cover children through their 26 <sup>th</sup> birth month. 80/20, \$25/\$40 co-pay network provider, 50/50 co-pay + unallowable charges from non-network providers. Coverage becomes effective the first day of the month following your entry on duty date. Health Assessment (HA) deductible credit applies to plan year and must be completed between 1-1-17 and 12-31-17 and credited prior to claims payment. Employees, covered spouses, <u>and dependents over age 18</u> , are eligible.		
<b>Health Care</b> Blue Cross Blue Shield of Oklahoma BlueOptions PPO  <b>White Plan</b>  <b><u>Provided by SE to Employee Only</u></b>	Reg. Full Time Employees with 75% FTE	You have 30 days from your entry on duty date to elect coverage for yourself & your eligible dependents. Otherwise, you may enroll or add coverage only during Option Period Enrollment in the fall.	SE Pays \$553.81 for employee coverage.	Child \$221.70 Children 443.29 Spouse 581.69 Spouse & Child(ren) \$1024.87	Annual individual deductible \$1250/\$3750 family deductible, calendar year. After meeting the deductible, the plan will pay 80%/70%/60%/50% of eligible & allowable charges depending on the provider level (see benefit summary). The individual maximum out-of-pocket expense is \$3500/\$4000/\$4500/\$6500. Family maximum out of pocket is higher. After maximum is met, the plan will pay 100% of all eligible and allowable charges if in network. Cover children through their 26 <sup>th</sup> birth month. Health Assessment (HA) deductible credit applies to plan year and must be completed between 1-1-17 and 12-31-17 and credited prior to claims payment. No retroactive claim adjustments will be allowed. Employees, covered spouses, <u>and dependents over age 18</u> , are eligible.		
<b>Health Care</b> Blue Cross Blue Shield of Oklahoma BlueChoice PPO  <b>Blue Plan</b>  <b><u>Provided by SE to Employee Only</u></b>	Reg. Full Time Employees with 75% FTE	You have 30 days from your entry on duty date to elect coverage for yourself & your eligible dependents. Otherwise, you may enroll or add coverage only during Option Period Enrollment in the fall.	SE Pays \$476.69 for employee coverage.  <b>SE pays \$77.12 toward dependent health if elected, or \$36.86 for employee only High Option Dental Plan</b>	Child \$190.53 Children 381.16 Spouse 500.41 Spouse & Child(ren) \$881.68	Plan pays member's first \$500 of eligible and allowable charges per covered individual. Annual individual deductible of \$500 and a family deductible of \$1000. Deductible begins after the first \$500 paid charges per covered individual. After meeting the deductible, the plan will pay 50% of all the eligible & allowable charges up to an individual maximum out-of-pocket expense of \$5,500 or a family maximum of \$11,000. After maximum is met, the plan will pay 100% of all eligible and allowable charges if in network, 70% if out of network. Cover children through their 26 <sup>th</sup> birth month. Health Assessment (HA) deductible credit applies to plan year and must be completed between 1-1-17 and 12-31-17 and credited prior to claims payment. No retroactive claim adjustments will be allowed. Employees, covered spouses, <u>and dependents over age 18</u> , are eligible.		
<b>Vision Service Plan</b> VSP Choice Plan	Reg. Full Time Employees with 75% FTE	You have 30 days from your entry on duty date to elect coverage for yourself & your eligible dependents. Otherwise, you may enroll or add coverage only during Option Period Enrollment in the fall.	\$6.54 Employee coverage	Child \$6.28 Children 7.46 Spouse 6.56 Spouse & Child(ren) \$15.82	<table border="0"> <tr> <td> <b>Well Vision Exam</b>                              \$10 co-pay /every calendar year  <b>Prescription Glasses</b>                              \$25 co-pay  <b>Lenses/</b> every calendar year                              -Single vision, lined bifocal, &amp; lined trifocal lenses                              -Polycarbonate lenses for dependent children  <b>Frame/</b> every calendar year                              -\$150 allowance for a wide selection of frames                              -20% off the amount over your allowance                              Cover children <b>through their 26<sup>th</sup> birth month.</b> </td> <td> <b>~OR~ Contact Lens Care</b>                              -No co-pay/ calendar year                              \$150 allowance for contacts &amp; contact lens exam (fitting &amp; evaluation)  <b>Extra Discounts &amp; Savings</b>                              -Glasses/Sunglasses                              -Contacts                              - Laser Vision Correction average 15% savings with contracted facilities  <b>Out-of-Network Reimbursement:</b>                              Exam-up to \$45                              Single vision lenses-up to \$30                              Lines bifocal lenses-up to \$50                              Lined trifocal lenses-up to \$65                              Frame-up to \$70                              Contacts-up to \$105                         </td> </tr> </table>	<b>Well Vision Exam</b> \$10 co-pay /every calendar year <b>Prescription Glasses</b> \$25 co-pay <b>Lenses/</b> every calendar year -Single vision, lined bifocal, & lined trifocal lenses -Polycarbonate lenses for dependent children <b>Frame/</b> every calendar year -\$150 allowance for a wide selection of frames -20% off the amount over your allowance Cover children <b>through their 26<sup>th</sup> birth month.</b>	<b>~OR~ Contact Lens Care</b> -No co-pay/ calendar year \$150 allowance for contacts & contact lens exam (fitting & evaluation) <b>Extra Discounts &amp; Savings</b> -Glasses/Sunglasses -Contacts - Laser Vision Correction average 15% savings with contracted facilities <b>Out-of-Network Reimbursement:</b> Exam-up to \$45 Single vision lenses-up to \$30 Lines bifocal lenses-up to \$50 Lined trifocal lenses-up to \$65 Frame-up to \$70 Contacts-up to \$105
<b>Well Vision Exam</b> \$10 co-pay /every calendar year <b>Prescription Glasses</b> \$25 co-pay <b>Lenses/</b> every calendar year -Single vision, lined bifocal, & lined trifocal lenses -Polycarbonate lenses for dependent children <b>Frame/</b> every calendar year -\$150 allowance for a wide selection of frames -20% off the amount over your allowance Cover children <b>through their 26<sup>th</sup> birth month.</b>	<b>~OR~ Contact Lens Care</b> -No co-pay/ calendar year \$150 allowance for contacts & contact lens exam (fitting & evaluation) <b>Extra Discounts &amp; Savings</b> -Glasses/Sunglasses -Contacts - Laser Vision Correction average 15% savings with contracted facilities <b>Out-of-Network Reimbursement:</b> Exam-up to \$45 Single vision lenses-up to \$30 Lines bifocal lenses-up to \$50 Lined trifocal lenses-up to \$65 Frame-up to \$70 Contacts-up to \$105						

BASIC BENEFITS	WHO IS ELIGIBLE	WHEN TO ENROLL	Case 5:15-cv-00372-C Document 270-4 Filed 02/27/18 Page 17 of 18 Appellate Case: 18-6102 Date Filed: 11/19/2018 Page: 217 (Cost Per Month or Annually)	EMPLOYEE PAYS (Cost Per Month)	COVERAGE PROVISIONS &/or EFFECTIVE DATE (Outline)																																																																																																																												
<p><b>DELTA DENTAL</b></p> <p><u>HIGH PLAN</u></p> <p><u>LOW PLAN</u></p> <p><u>PREVENTIVE PLAN</u></p>	<p>Reg. Full Time Employees with 75% FTE</p>	<p>You have 30 days from your entry on duty date to elect coverage for yourself &amp; your eligible dependents to avoid "late entrant" limitations with subsequent open enrollment. Otherwise, you may enroll or add coverage only during Option Period Enrollment in the fall.</p>	<p><b>SE pays \$36.86 for employee high dental if the Blue Plan Health is elected and no dependent health.</b></p>	<p><b>HIGH</b></p> <p>Employee \$36.86 Employee/Chd \$54.30 Employee/Chldn \$70.20 Employee/Sp \$73.70 Employee/Sp/Child(ren) \$110.70</p> <p><b>LOW</b></p> <p>Employee \$26.00 Employee/Chd \$38.24 Employee/Chldn \$46.70 Employee/Sp \$55.80 Employee/Sp/Child(ren) \$78.20</p> <p><b>PREVENTIVE</b></p> <p>Employee \$18.26 Employee/Chd \$30.24 Employee/Chldn \$39.58 Employee/Sp \$37.52 Employee/Sp/Child(ren) \$60.18</p>	<table border="1"> <thead> <tr> <th colspan="2"></th> <th colspan="2"><b>HIGH PLAN</b></th> </tr> <tr> <th colspan="2"></th> <th><b>PPO Network</b></th> <th><b>Premier Network</b></th> </tr> </thead> <tbody> <tr> <td><b>Class I</b></td> <td><b>100%</b></td> <td><b>100%</b></td> <td><b>100%</b></td> </tr> <tr> <td colspan="4"><b>Diagnostic/Preventive</b></td> </tr> <tr> <td><b>Class II</b></td> <td><b>85% after \$25 ded.</b></td> <td><b>70% after \$25 ded.</b></td> <td><b>70% after \$25 ded.</b></td> </tr> <tr> <td colspan="4"><b>Basic Services</b></td> </tr> <tr> <td><b>Class III</b></td> <td><b>60% after \$25 ded.</b></td> <td><b>50% after \$25 ded.</b></td> <td><b>50% after \$25 ded.</b></td> </tr> <tr> <td colspan="4"><b>Major Services</b></td> </tr> <tr> <td><b>Class IV</b></td> <td><b>50%</b></td> <td><b>50%</b></td> <td><b>50%</b></td> </tr> <tr> <td colspan="4"><b>Orthodontic Services</b></td> </tr> <tr> <td colspan="4"><b>Dependents under 26</b></td> </tr> <tr> <td colspan="2"></td> <td colspan="2"><b>LOW PLAN</b></td> </tr> <tr> <td><b>Class I</b></td> <td><b>100%</b></td> <td><b>100%</b></td> <td><b>100%</b></td> </tr> <tr> <td colspan="4"><b>Diagnostic/Preventive</b></td> </tr> <tr> <td><b>Class II</b></td> <td><b>75% after \$50 ded.</b></td> <td><b>70% after \$50 ded.</b></td> <td><b>70% after \$50 ded.</b></td> </tr> <tr> <td colspan="4"><b>Basic Services</b></td> </tr> <tr> <td><b>Class III</b></td> <td><b>60% after \$50 ded.</b></td> <td><b>50% after \$50 ded.</b></td> <td><b>50% after \$50 ded.</b></td> </tr> <tr> <td colspan="4"><b>Major Services</b></td> </tr> <tr> <td><b>Class IV</b></td> <td><b>N/A</b></td> <td><b>N/A</b></td> <td><b>N/A</b></td> </tr> <tr> <td colspan="4"><b>No Orthodontic Services</b></td> </tr> <tr> <td colspan="2"></td> <td colspan="2"><b>PREVENTIVE PLAN</b></td> </tr> <tr> <td colspan="2"></td> <td><b>PPO Network</b></td> <td><b>Premier Network</b></td> </tr> <tr> <td><b>Class I</b></td> <td><b>100% after \$50 ded</b></td> <td><b>100% after \$50 ded</b></td> <td><b>100% after \$50 ded</b></td> </tr> <tr> <td colspan="4"><b>Diagnostic/Preventive</b></td> </tr> <tr> <td><b>Class II</b></td> <td><b>80% after \$50 ded.</b></td> <td><b>80% after \$50 ded.</b></td> <td><b>80% after \$50 ded.</b></td> </tr> <tr> <td colspan="4"><b>Basic Services</b></td> </tr> <tr> <td><b>Class III</b></td> <td><b>N/A</b></td> <td><b>N/A</b></td> <td><b>N/A</b></td> </tr> <tr> <td colspan="4"><b>Major Services</b></td> </tr> <tr> <td><b>Class IV</b></td> <td><b>N/A</b></td> <td><b>N/A</b></td> <td><b>N/A</b></td> </tr> <tr> <td colspan="4"><b>No Orthodontic Services</b></td> </tr> <tr> <td colspan="4"><b>Children may be covered through their 26<sup>th</sup> birth month with all plans.</b></td> </tr> </tbody> </table>			<b>HIGH PLAN</b>				<b>PPO Network</b>	<b>Premier Network</b>	<b>Class I</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>Diagnostic/Preventive</b>				<b>Class II</b>	<b>85% after \$25 ded.</b>	<b>70% after \$25 ded.</b>	<b>70% after \$25 ded.</b>	<b>Basic Services</b>				<b>Class III</b>	<b>60% after \$25 ded.</b>	<b>50% after \$25 ded.</b>	<b>50% after \$25 ded.</b>	<b>Major Services</b>				<b>Class IV</b>	<b>50%</b>	<b>50%</b>	<b>50%</b>	<b>Orthodontic Services</b>				<b>Dependents under 26</b>						<b>LOW PLAN</b>		<b>Class I</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>Diagnostic/Preventive</b>				<b>Class II</b>	<b>75% after \$50 ded.</b>	<b>70% after \$50 ded.</b>	<b>70% after \$50 ded.</b>	<b>Basic Services</b>				<b>Class III</b>	<b>60% after \$50 ded.</b>	<b>50% after \$50 ded.</b>	<b>50% after \$50 ded.</b>	<b>Major Services</b>				<b>Class IV</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>No Orthodontic Services</b>						<b>PREVENTIVE PLAN</b>				<b>PPO Network</b>	<b>Premier Network</b>	<b>Class I</b>	<b>100% after \$50 ded</b>	<b>100% after \$50 ded</b>	<b>100% after \$50 ded</b>	<b>Diagnostic/Preventive</b>				<b>Class II</b>	<b>80% after \$50 ded.</b>	<b>80% after \$50 ded.</b>	<b>80% after \$50 ded.</b>	<b>Basic Services</b>				<b>Class III</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>Major Services</b>				<b>Class IV</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>No Orthodontic Services</b>				<b>Children may be covered through their 26<sup>th</sup> birth month with all plans.</b>			
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<p><b>Long-Term Disability</b></p> <p>MetLife Insurance Company Core Plan or the Buy-Up Option</p>	<p>Reg. Full Time Employees with 75% FTE</p>	<p>Eligible after 6 months.</p>	<p><b>Core Plan:</b> You are insured on the date you become eligible &amp; will start receiving benefits after 6 months of continuous disability. Appointment Salary X .00148 annually.</p>	<p><b>Buy-Up Option:</b> Buy-Up; provides benefits sooner-after 3 months of continuous disability at a minimal cost to employee through payroll deduction.</p> <p>(Appointment Salary X .0008/12</p>	<p><b>Monthly Income Benefit replaces 60% of your monthly wage base up to a maximum of \$8,000 per month before offsets to a max of \$160,000.00. Minimum Standard benefit payment is the greater of \$100 or 10% of the Monthly Income Benefit before offsets.</b> You have two options from which to choose, depending on when and how long you would receive benefits. (Offsets that will affect your benefit will include benefits paid to you such as social security disability, OTRS disability, etc.)</p>																																																																																																																												
<p><b>Life Insurance</b></p> <p>Metropolitan Life Insurance Company "MetLife"</p>	<p>Reg. Full Time Employees with 75% FTE</p>	<p>Employees are automatically enrolled on the first day of the month following the date they become an Active Member. Dependents must be enrolled within 31 days of eligibility to avoid proof of insurability. Evidence of Insurability form must be submitted if written election is made more than 31 days after becoming eligible for insurance.</p>	<p>(Salary x 2-rounded to the next higher \$1000) X.000145), annually. Annual salary updated each January 1.</p>	<p>Spouse/Children \$10,000/\$5,000 \$2.40 or with AD&amp;D \$2.65 total monthly premium. Spouse/Children \$20,000/\$10,000 \$4.80 or with AD&amp;D \$5.30 total monthly premium. Spouse/Children \$50,000/\$10,000 \$12 or with AD&amp;D \$13 total monthly premium.</p>	<p>Employee life insurance is 2 X the employees appointed annual salary rounded to the next higher \$1000, until age 65 (65% to age 69, 50% to age 74, 35% at age 75 and over) (maximum coverage of \$250,000); updated yearly based on July pay; plus Accidental Death and Dismemberment; \$10,000 seat belt &amp; \$5,000 air bag extra coverage. <b>Optional dependent coverage for spouse (\$10,000, \$20,000 or \$50,000); unmarried dependent child through the 26 the birth month, (\$5,000 or \$10,000).</b></p>																																																																																																																												
<p><b>Section 125 Flexible Benefits</b> (Cafeteria Plan) American Fidelity Unreimbursed Medical &amp; Dependent Care</p>	<p>Reg. Full Time Employees with 75% FTE</p>	<p>Within 30 days of employment date for new employees; annual open enrollment.</p>		<p>No cost Tax savings.</p> <p><b>USE IT OR LOSE IT ANNUALLY</b></p>	<p>IRS Section 125 Plan to tax shelter employee-paid health care, dental, cancer, and vision insurance premiums. A change in family status that affects insurance premium needs to be processed through Human Resources within <b>30 days of event. This benefit includes: unreimbursed medical expenses, excludes premiums (up to * \$2,500 per calendar year); and dependent care expenses (up to \$5,000 per calendar year), per IRS regulations). All eligible expenses can reduce taxable income, thereby increasing take-home pay.</b> *Effective 1-1-13 max of \$2500 per calendar year</p>																																																																																																																												
<p><b>Oklahoma Teachers'</b></p>	<p>Reg. FT emp. with 75% FTE</p>	<p>Faculty, Administrative, &amp; Professionals are mandated. Paraprofessional, Support Staff &amp;</p>	<p>Contributes 7% of all wages and fringe benefits that exceed \$25,000.</p>	<p>Contributes 7% of all wages + fringe benefits, on the first \$25,000 earned each fiscal year: equal to \$1,750.00 annually</p>	<p><b>Defined benefit plan requiring 5 years of contributions for Oklahoma service in public education to become vested.</b> Vesting allows the option to have lifetime annuity income.</p>																																																																																																																												

BASIC BENEFITS	WHO IS ELIGIBLE	WHEN TO ENROLL	SE PAYS (Cost Per Month or Annually)	EMPLOYEE PAYS (Cost Per Month)	COVERAGE PROVISIONS &/or EFFECTIVE DATE (Outline)
<b>Retirement System (OTRS) 401(a)</b>	or more; Adjunct faculty ineligible	Technical have optional enrollment at any time. NOTE: becoming optional member later than at hire or in July (when plan year begins) requires catching up on contributions on wages back to July.	8.55% Administrative Fee	(fiscal year).	Contributions are deposited to the member's account & may be withdrawn 4 months after leaving the system. Ten years of OTRS contributory service required to receive a \$100-\$105/mo. subsidy from OTRS toward group health plan premiums at retirement.
<b>FICA OASDI Medicare</b>	All employees unless claim student exemption	Automatic Enrollment.	6.2% of first \$127,200 FICA gross in calendar year. (Maximum \$7886.40) 1.45% of all income in calendar year.	6.2% of first \$127,200 FICA gross in calendar year. (Maximum \$7886.40) Same as SE pays	<b>Old-Age, Survivors, &amp; Disability Insurance (OASDI)</b> covers employee, dependents, surviving family; lump-sum death benefits.  Medicare provides coverage for: Part A - Hospitalization Part B - Supplemental medical insurance.
<b>Workers' Compensation</b>	All employees regardless of FTE including temporary & student employees	Automatic Enrollment.	All income in calendar year X .82%		Covers employee medical expenses & loss of income resulting from work-related illness or injury.
<b>Unemployment Compensation</b>	All employees regardless of FTE including temporary	Automatic Enrollment.	All income in calendar year X .08 %		Provides economic security for a worker during temporary periods of unemployment.
<b>Supplemental Tax Deferred Annuities (TDAs) VOYA 403(b) &amp; 457(b)</b>	All employees with the exception of student workers	Optional Enrollment at any time.		<b>403(b) &amp; 457(b)</b> Min=\$200/year Max=\$18,000 for <b>For additional catch-up amounts contact Human Resources.</b>	403(b) 457(b) tax deferred supplemental retirement plans with <b>VOYA</b> approved for payroll deduction. <b>Minimum and maximum tax-deferred exclusion allowances are federally regulated.</b>

**Additional Benefits:** Free Parking Most Lots+ Generous Leave Policies, i.e., Annual, Sick for employee + immediate family, Family Medical Leave, Military Leave + Paid Holidays (average 20 days paid per year) + Library + Tuition Assistance.  
**Optional Benefits:** Dreaded disease insurance, dependent health and life insurance, Oklahoma College Savings Plan, short-term disability insurance and long-term care insurance.  
**Annual Leave Accrual:** Based on Date of Emp. (DOE) and must be 75% FTE or more.

Years of Service	Annual Leave	Mo. Accrual Rate	Accumulation Limit
0-5 years	15 days (120 hrs) per yr.	1.25 days (10 hrs)	30 days (240 hrs)
6-20 years	18 days (144 hrs) per yr.	1.5 days (12 hrs)	45 days (360 hrs)
Over 20 years	20 days (160 hrs) per yr.	1.67 days (13.33 hrs)**	60 days (480 hrs)

Non-exempt positions are eligible to earn **compensation for overtime**. To learn if you are exempt or non-exempt please call Human Resources (HR) X2162.  
 Employees in non-exempt positions who work more than 40 hours during the established work week (Sunday through Saturday) qualify for compensatory time.  
 Such employees will be given compensatory time in lieu of payment at the rate of one and one-half hours for each hour actually worked over 40 (holidays, annual, sick, and compensatory time used during the 40 hour week are not treated as hours worked for time and a half).

\*Generally Annual Leave does not apply to Faculty. Call Human Resources. A two week notice must be given for terminal annual leave to be paid, four week notice for managerial positions.  
 \*\*June's entry will be 13.37 hours to equal exactly 20 days earned for the fiscal year.

<u>Helpful Telephone Numbers and Websites</u>		<u>VISION</u>	
American Fidelity	..800-323-3748	Vision Service Plan (VSP)	1-800-877-7195
American Fidelity website	http://www.afadvantage.com	Vision Service Plan (VSP) website	.www.vsp.com
AF Advantage (Automated Balance Info Section 125)	...800-325-0654	<b>OKLAHOMA TEACHERS' RETIREMENT SYSTEM</b>	..1-877-738-6365 or www.ok.gov/trs
<b>HEALTH AND DENTAL INSURANCE</b>		<b>SE</b> website	...http://www.se.edu/
OKHEEI Group Blue Cross Blue Shield of Oklahoma	.http://www.bcbsok.com/okheei	<b>SE</b> Human Resources website	... http://www.se.edu/dept/human-resources
Health Customer Service	. 800-672-2567	<b>SE</b> Academic Policies/Procedures Manual	http://www.se.edu/policies
Pharmacy Customer Service	877-546-2779	<b>SE</b> Staff Policies/Procedures Handbook	http://www.se.edu/policies
DELTA Dental Customer Service	.. ..800-522-0188	<b>RUSO Board Policies/Procedures</b>	http://www.ruso.edu/Home.aspx
<b>LIFE &amp; LTD (Long Term Disability)</b>		<b>Supplemental Tax Deferred Annuities (TDAs)</b>	
MetLife Insurance Co	.1-800-423-2765	<b>VOYA 457(b) 403(b)</b>	... http://www.ok2retire.com
		<b>Plan With Ease</b> website	http://www.planwithease.com

Southeastern Oklahoma State University does not discriminate on the basis of race, color, national origin, sex, disability, or age, in its programs and activities. The following person has been designated to handle inquiries regarding the non-discrimination policies: Title IX Coordinator, Administration Room 311, 580-745-3090.



# Exhibit 8

**Card Salary Equations:**

- *Associate Professor:* But for compensation = Degree (\$38,215) + Rank (\$11,232) + Experience (\$546 x years allowable [max 19])
- *Full Professor:* But for compensation = Degree (\$38,215) + Rank (\$15,912) + Experience (\$546 x years allowable [max 31])

***Overload class compensation:*** \$2,100 per class

***Summer class compensation:*** \$3,700 per class

***Administrative duty compensation:*** \$2,190 + 10% of Card Salary total

***Traditional Fringe Benefits:*** \$7,916.52 per year

***Professor Fringe Benefits:*** \$6,328.87 per year

***Retirement contribution:*** 7% of all wages and fringe benefits that exceed \$25,000

**Front pay damages for Dr. Rachel Tudor**

*Scenario 1: Full Professor promotion as of 2021-22 term; 10 years Administrative duties between 2029-30 and 2038-39 terms; 1 Summer session and 1 class overload; End work at Age 75; present value reduction 1.5%*

**But for Compensation**

Academic Year	Period	Salary Card Earnings	Retirement	Summer Session and Class Overload	Trad'l Fringe Benefits	Prof. Fringe Benefits	Total But For Compensation	Present Value Reduction (1.5%)	Cumulative Total
2017-18	11/20/17 – 7/31/18	\$39,571.73	\$2,117.24	\$5,800	\$5,487.57	\$4,387.02	\$57,436.35	\$56,574.80	\$56,574.80
2018-19	8/1/18 – 7/31/19	\$57,637	\$3,517.74	\$5,800	\$7,916.52	\$6,328.87	\$81,475.16	\$80,253.03	\$136,827.83
2019-20	8/1/19 – 7/31/20	\$58,183	\$3,555.96	\$5,800	\$7,916.52	\$6,328.87	\$82,059.38	\$80,828.49	\$271,656.32
2020-21	8/1/20 – 7/31/21	\$58,729	\$3,594.18	\$5,800	\$7,916.52	\$6,328.87	\$82,368.57	\$81,133.04	\$298,789.36
2021-22	8/1/21 – 7/31/22	\$59,275	\$3,632.40	\$5,800	\$7,916.52	\$6,328.87	\$82,952.79	\$81,708.50	\$380,497.86
2022-23	8/1/22 – 7/31/23	\$64,501	\$3,998.22	\$5,800	\$7,916.52	\$6,328.87	\$88,544.61	\$87,216.44	\$467,714.30
2023-24	8/1/23 – 7/31/24	\$65,047	\$4,036.44	\$5,800	\$7,916.52	\$6,328.87	\$89,128.83	\$87,791.90	\$555,506.20
2024-25	8/1/24 – 7/31/25	\$65,593	\$4,074.66	\$5,800	\$7,916.52	\$6,328.87	\$89,713.05	\$88,367.35	\$643,873.55
2025-26	8/1/25 – 7/31/26	\$66,139	\$4,112.88	\$5,800	\$7,916.52	\$6,328.87	\$90,297.27	\$88,942.81	\$732,816.36
2026-27	8/1/26 – 7/31/27	\$66,685	\$4,151.10	\$5,800	\$7,916.52	\$6,328.87	\$90,881.49	\$89,518.27	\$822,334.63
2027-28	8/1/27 – 7/31/28	\$67,231	\$4,189.32	\$5,800	\$7,916.52	\$6,328.87	\$91,465.71	\$90,093.72	\$912,428.35
2028-29	8/1/28 – 7/31/29	\$67,777	\$4,227.54	\$5,800	\$7,916.52	\$6,328.87	\$92,049.93	\$90,669.18	\$1,003,097.53
2029-30	8/1/29 – 7/31/30	\$77,345.30	\$4,897.32	\$5,800	\$7,916.52	\$6,328.87	\$102,288.01	\$100,753.69	\$1,103,851.22
2030-31	8/1/30 – 7/31/31	\$77,945.90	\$4,939.36	\$5,800	\$7,916.52	\$6,328.87	\$102,930.65	\$101,386.69	\$1,205,237.91
2031-32	8/1/31 – 7/31/32	\$78,546.50	\$4,981.41	\$5,800	\$7,916.52	\$6,328.87	\$103,573.30	\$102,019.70	\$1,307,257.61
2032-33	8/1/32 – 7/31/33	\$79,147.10	\$5,023.45	\$5,800	\$7,916.52	\$6,328.87	\$104,215.94	\$102,652.70	\$1,409,910.31
2033-34	8/1/33 – 7/31/34	\$79,747.70	\$5,065.49	\$5,800	\$7,916.52	\$6,328.87	\$104,858.58	\$103,285.70	\$1,513,196.01
2034-35	8/1/34 – 7/31/35	\$80,348.30	\$5,107.53	\$5,800	\$7,916.52	\$6,328.87	\$105,501.22	\$103,918.70	\$1,617,114.71
2035-36	8/1/35 – 7/31/36	\$80,348.30	\$5,107.53	\$5,800	\$7,916.52	\$6,328.87	\$105,501.22	\$103,918.70	\$1,721,033.41
2036-37	8/1/36 – 7/31/37	\$80,348.30	\$5,107.53	\$5,800	\$7,916.52	\$6,328.87	\$105,501.22	\$103,918.70	\$1,824,952.11
2037-38	8/1/37 – 7/31/38	\$80,348.30	\$5,107.53	\$5,800	\$7,916.52	\$6,328.87	\$105,501.22	\$103,918.70	\$1,928,870.81
2038-39	8/1/28 – 7/31/39	\$80,348.30	\$5,107.53	\$5,800	\$7,916.52	\$6,328.87	\$105,501.22	\$103,918.70	\$2,032,789.51



**Front pay damages for Dr. Rachel Tudor**

*Scenario 2: Full Professor promotion as of 2021-22 term; 10 years Administrative duties between 2029-30 and 2038-39 terms; No Summer session and no Class Overload; End work at Age 75; present value reduction 1.5%*

**But for Compensation**

Academic Year	Period	Total Salary Card Earnings	Retirement	Summer Session and Class Overload	Trad'l Fringe Benefits	Prof. Fringe Benefits	Total But For Compensation	Present Value Reduction (1.5%)	Cumulative Total
2017-18	11/20/17 – 7/31/18	\$39,571.73	\$2,017.20	\$0	\$5,487.57	\$4,387.02	\$51,463.52	\$50,691.57	\$50,691.57
2018-19	8/1/18 – 7/31/19	\$57,637	\$3,281.77	\$0	\$7,916.52	\$6,328.87	\$75,164.16	\$74,036.70	\$124,728.27
2019-20	8/1/19 – 7/31/20	\$58,183	\$3,319.99	\$0	\$7,916.52	\$6,328.87	\$75,748.38	\$74,612.15	\$125,303.72
2020-21	8/1/20 – 7/31/21	\$58,729	\$3,358.21	\$0	\$7,916.52	\$6,328.87	\$76,332.60	\$75,187.61	\$200,491.33
2021-22	8/1/21 – 7/31/22	\$59,275	\$3,396.43	\$0	\$7,916.52	\$6,328.87	\$76,916.82	\$75,763.07	\$276,254.40
2022-23	8/1/22 – 7/31/23	\$64,501	\$3,762.25	\$0	\$7,916.52	\$6,328.87	\$82,508.64	\$81,271.01	\$357,525.41
2023-24	8/1/23 – 7/31/24	\$65,047	\$3,800.47	\$0	\$7,916.52	\$6,328.87	\$83,092.86	\$81,846.47	\$439,371.88
2024-25	8/1/24 – 7/31/25	\$65,593	\$3,838.69	\$0	\$7,916.52	\$6,328.87	\$83,677.08	\$82,421.92	\$512,793.80
2025-26	8/1/25 – 7/31/26	\$66,139	\$3,876.91	\$0	\$7,916.52	\$6,328.87	\$84,261.30	\$82,997.38	\$604,791.18
2026-27	8/1/26 – 7/31/27	\$66,685	\$3,915.13	\$0	\$7,916.52	\$6,328.87	\$84,845.52	\$83,572.84	\$688,364.02
2027-28	8/1/27 – 7/31/28	\$67,231	\$3,953.35	\$0	\$7,916.52	\$6,328.87	\$85,429.74	\$84,148.29	\$772,512.31
2028-29	8/1/28 – 7/31/29	\$67,777	\$3,991.57	\$0	\$7,916.52	\$6,328.87	\$86,013.96	\$84,723.75	\$857,236.06
2029-30	8/1/29 – 7/31/30	\$77,345.30	\$4,661.35	\$0	\$7,916.52	\$6,328.87	\$96,252.04	\$94,808.26	\$952,044.32
2030-31	8/1/30 – 7/31/31	\$77,945.90	\$4,703.39	\$0	\$7,916.52	\$6,328.87	\$96,894.68	\$95,441.26	\$1,047,485.58
2031-32	8/1/31 – 7/31/32	\$78,546.50	\$4,745.43	\$0	\$7,916.52	\$6,328.87	\$97,537.32	\$96,074.26	\$1,143,559.84
2032-33	8/1/32 – 7/31/33	\$79,147.10	\$4,787.47	\$0	\$7,916.52	\$6,328.87	\$98,179.96	\$96,707.26	\$1,240,267.10
2033-34	8/1/33 – 7/31/34	\$79,747.70	\$4,829.52	\$0	\$7,916.52	\$6,328.87	\$98,822.61	\$97,304.27	\$1,337,571.37
2034-35	8/1/34 – 7/31/35	\$80,348.30	\$4,871.56	\$0	\$7,916.52	\$6,328.87	\$99,465.25	\$97,973.27	\$1,435,544.64
2035-36	8/1/35 – 7/31/36	\$80,348.30	\$4,871.56	\$0	\$7,916.52	\$6,328.87	\$99,465.25	\$97,973.27	\$1,533,517.91
2036-37	8/1/36 – 7/31/37	\$80,348.30	\$4,871.56	\$0	\$7,916.52	\$6,328.87	\$99,465.25	\$97,973.27	\$1,631,491.18
2037-38	8/1/37 – 7/31/38	\$80,348.30	\$4,871.56	\$0	\$7,916.52	\$6,328.87	\$99,465.25	\$97,973.27	\$1,729,464.45
2038-39	8/1/28 – 7/31/39	\$80,348.30	\$4,871.56	\$0	\$7,916.52	\$6,328.87	\$99,465.25	\$97,973.27	\$1,827,437.72

**Front pay damages for Dr. Rachel Tudor**

*Scenario 3: Full Professor promotion as of 2021-22 term; No administrative duties; 1 Summer session and 1 Class Overload; End work at Age 75; present value reduction 1.5%*

**But for Compensation**

Academic Year	Period	Salary Card Earnings	Retirement	Summer and Class Overload	Trad'l Fringe Benefits	Prof. Fringe Benefits	Total But For Compensation	Present Value Reduction (1.5%)	Cumulative Total
2017-18	11/20/17 – 7/31/18	\$39,571.73	\$2,117.24	\$5,800	\$5,487.57	\$4,387.02	\$57,436.35	\$56,574.80	\$56,574.80
2018-19	8/1/18 – 7/31/19	\$57,637	\$3,517.74	\$5,800	\$7,916.52	\$6,328.87	\$81,475.16	\$80,253.03	\$136,827.83
2019-20	8/1/19 – 7/31/20	\$58,183	\$3,555.96	\$5,800	\$7,916.52	\$6,328.87	\$82,059.38	\$80,828.49	\$271,656.32
2020-21	8/1/20 – 7/31/21	\$58,729	\$3,594.18	\$5,800	\$7,916.52	\$6,328.87	\$82,368.57	\$81,133.04	\$298,789.36
2021-22	8/1/21 – 7/31/22	\$59,275	\$3,632.40	\$5,800	\$7,916.52	\$6,328.87	\$82,952.79	\$81,708.50	\$380,497.86
2022-23	8/1/22 – 7/31/23	\$64,501	\$3,998.22	\$5,800	\$7,916.52	\$6,328.87	\$88,544.61	\$87,216.44	\$467,714.30
2023-24	8/1/23 – 7/31/24	\$65,047	\$4,036.44	\$5,800	\$7,916.52	\$6,328.87	\$89,128.83	\$87,791.90	\$555,506.20
2024-25	8/1/24 – 7/31/25	\$65,593	\$4,074.66	\$5,800	\$7,916.52	\$6,328.87	\$89,713.05	\$88,367.35	\$643,873.55
2025-26	8/1/25 – 7/31/26	\$66,139	\$4,112.88	\$5,800	\$7,916.52	\$6,328.87	\$90,297.27	\$88,942.81	\$732,816.36
2026-27	8/1/26 – 7/31/27	\$66,685	\$4,151.10	\$5,800	\$7,916.52	\$6,328.87	\$90,881.49	\$89,518.27	\$822,334.63
2027-28	8/1/27 – 7/31/28	\$67,231	\$4,189.32	\$5,800	\$7,916.52	\$6,328.87	\$91,465.71	\$90,093.72	\$912,428.35
2028-29	8/1/28 – 7/31/29	\$67,777	\$4,227.54	\$5,800	\$7,916.52	\$6,328.87	\$92,049.93	\$90,669.18	\$1,003,097.53
2029-30	8/1/29 – 7/31/30	\$68,323	\$4,435.79	\$5,800	\$7,916.52	\$6,328.87	\$92,804.18	\$91,412.12	\$1,094,509.65
2030-31	8/1/30 – 7/31/31	\$68,869	\$4,474.01	\$5,800	\$7,916.52	\$6,328.87	\$93,338.40	\$91,938.32	\$1,186,447.97
2031-32	8/1/31 – 7/31/32	\$69,415	\$4,512.23	\$5,800	\$7,916.52	\$6,328.87	\$93,972.62	\$92,563.03	\$1,279,011.00
2032-33	8/1/32 – 7/31/33	\$69,961	\$4,550.45	\$5,800	\$7,916.52	\$6,328.87	\$94,556.84	\$93,138.49	\$1,372,149.49
2033-34	8/1/33 – 7/31/34	\$70,507	\$4,588.67	\$5,800	\$7,916.52	\$6,328.87	\$95,141.06	\$93,713.94	\$1,465,863.43
2034-35	8/1/34 – 7/31/35	\$71,053	\$4,626.89	\$5,800	\$7,916.52	\$6,328.87	\$95,725.28	\$94,289.40	\$1,560,152.83
2035-36	8/1/35 – 7/31/36	\$71,053	\$4,626.89	\$5,800	\$7,916.52	\$6,328.87	\$95,725.28	\$94,289.40	\$1,654,442.23
2036-37	8/1/36 – 7/31/37	\$71,053	\$4,626.89	\$5,800	\$7,916.52	\$6,328.87	\$95,725.28	\$94,289.40	\$1,748,731.63
2037-38	8/1/37 – 7/31/38	\$71,053	\$4,626.89	\$5,800	\$7,916.52	\$6,328.87	\$95,725.28	\$94,289.40	\$1,843,021.03
2038-39	8/1/28 – 7/31/39	\$71,053	\$4,626.89	\$5,800	\$7,916.52	\$6,328.87	\$95,725.28	\$94,289.40	\$1,937,310.43

**Front pay damages for Dr. Rachel Tudor**

*Scenario 4: Full Professor promotion as of 2021-22 term; No administrative duties; No Summer session and no class overload; End work at Age 75; present value reduction 1.5%*

**But for Compensation**

Academic Year	Period	Total Salary Card Earnings	Retirement	Summer Session and Class Overload	Trad'l Fringe Benefits	Prof. Fringe Benefits	Total But For Compensation	Present Value Reduction (1.5%)	Cumulative Total
2017-18	11/20/17 – 7/31/18	\$39,571.73	\$2,017.20	\$0	\$5,487.57	\$4,387.02	\$51,463.52	\$50,691.57	\$50,691.57
2018-19	8/1/18 – 7/31/19	\$57,637	\$3,281.77	\$0	\$7,916.52	\$6,328.87	\$75,164.16	\$74,036.70	\$124,728.27
2019-20	8/1/19 – 7/31/20	\$58,183	\$3,319.99	\$0	\$7,916.52	\$6,328.87	\$75,748.38	\$74,612.15	\$125,303.72
2020-21	8/1/20 – 7/31/21	\$58,729	\$3,358.21	\$0	\$7,916.52	\$6,328.87	\$76,332.60	\$75,187.61	\$200,491.33
2021-22	8/1/21 – 7/31/22	\$59,275	\$3,396.43	\$0	\$7,916.52	\$6,328.87	\$76,916.82	\$75,763.07	\$276,254.40
2022-23	8/1/22 – 7/31/23	\$64,501	\$3,762.25	\$0	\$7,916.52	\$6,328.87	\$82,508.64	\$81,271.01	\$357,525.41
2023-24	8/1/23 – 7/31/24	\$65,047	\$3,800.47	\$0	\$7,916.52	\$6,328.87	\$83,092.86	\$81,846.47	\$439,371.88
2024-25	8/1/24 – 7/31/25	\$65,593	\$3,838.69	\$0	\$7,916.52	\$6,328.87	\$83,677.08	\$82,421.92	\$512,793.80
2025-26	8/1/25 – 7/31/26	\$66,139	\$3,876.91	\$0	\$7,916.52	\$6,328.87	\$84,261.30	\$82,997.38	\$604,791.18
2026-27	8/1/26 – 7/31/27	\$66,685	\$3,915.13	\$0	\$7,916.52	\$6,328.87	\$84,845.52	\$83,572.84	\$688,364.02
2027-28	8/1/27 – 7/31/28	\$67,231	\$3,953.35	\$0	\$7,916.52	\$6,328.87	\$85,429.74	\$84,148.29	\$772,512.31
2028-29	8/1/28 – 7/31/29	\$67,777	\$3,991.57	\$0	\$7,916.52	\$6,328.87	\$86,013.96	\$84,723.75	\$857,236.06
2029-30	8/1/29 – 7/31/30	\$68,323	\$4,029.79	\$0	\$7,916.52	\$6,328.87	\$86,598.18	\$85,299.21	\$942,535.27
2030-31	8/1/30 – 7/31/31	\$68,869	\$4,068.01	\$0	\$7,916.52	\$6,328.87	\$87,182.40	\$85,874.67	\$1,028,409.94
2031-32	8/1/31 – 7/31/32	\$69,415	\$4,106.23	\$0	\$7,916.52	\$6,328.87	\$87,766.62	\$86,450.12	\$1,114,860.06
2032-33	8/1/32 – 7/31/33	\$69,961	\$4,144.45	\$0	\$7,916.52	\$6,328.87	\$88,350.84	\$87,025.58	\$1,201,885.64
2033-34	8/1/33 – 7/31/34	\$70,507	\$4,182.67	\$0	\$7,916.52	\$6,328.87	\$88,935.06	\$87,601.03	\$1,289,486.67
2034-35	8/1/34 – 7/31/35	\$71,053	\$4,220.89	\$0	\$7,916.52	\$6,328.87	\$89,519.28	\$88,176.49	\$1,377,663.16
2035-36	8/1/35 – 7/31/36	\$71,053	\$4,220.89	\$0	\$7,916.52	\$6,328.87	\$89,519.28	\$88,176.49	\$1,465,839.65
2036-37	8/1/36 – 7/31/37	\$71,053	\$4,220.89	\$0	\$7,916.52	\$6,328.87	\$89,519.28	\$88,176.49	\$1,554,016.14
2037-38	8/1/37 – 7/31/38	\$71,053	\$4,220.89	\$0	\$7,916.52	\$6,328.87	\$89,519.28	\$88,176.49	\$1,642,192.63
2038-39	8/1/28 – 7/31/39	\$71,053	\$4,220.89	\$0	\$7,916.52	\$6,328.87	\$89,519.28	\$88,176.49	\$1,730,369.12



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  
OPPOSED MOTION TO SUPPLEMENT ECF No. 279**

Pursuant to Local Rule 7.1(k) Dr. Tudor moves to supplement her earlier filed motion for reconsideration of reinstatement, or, in the alternative, front pay (ECF No. 279) with materials pertinent to the reinstatement remedy which were unavailable at the time of filing.

**BACKGROUND**

Dr. Tudor prevailed at her jury trial on two counts of discrimination and one count of retaliation (ECF No. 262). Tudor desires to be reinstated to Southeastern Oklahoma State University (“Southeastern”) as an Associate

Professor with tenure in the English, Humanities, and Languages Department (“English Department”).

*Previous requests and briefing on reinstatement.* On December 11, 2017, Tudor submitted a timely motion requesting reinstatement (ECF No. 268). At the time, Tudor presented new evidence and pointed to record evidence showing that she is legally entitled to reinstatement and that there are no extreme hostilities at Southeastern precluding reinstatement.

On January 29, 2018, the Court denied Tudor’s request for reinstatement (ECF No. 275). The Order turned on findings that the Southeastern faculty as a whole will be hostile towards Tudor if she returns (*id.* at 4), that healthy relationships between Southeastern and Tudor are impossible due to this litigation (*id.* at 3), that the Southeastern faculty believe Tudor is a bad teacher (*id.* at 3), and that Tudor’s mere presence on campus is impossible because Tudor would be made to feel “unworthy” by the Southeastern faculty (*id.* at 4).

On February 9, 2018, Dr. Tudor requested that the Court reconsider reinstatement as a remedy (ECF No. 276). In her request, Tudor pointed to findings of fact inconsistent with the record (*id.* at 1–16), conflicts with binding precedent (*id.* at 16–21), and equitable considerations (*id.* at 21–25) meriting reconsideration. Therein, Tudor also advised of changes in

circumstance (*id.* at 25), including Tudor's plans to submit a proposal to present at a Southeastern conference.

On February 12, 2018, the Court denied Tudor's request for reconsideration of reinstatement (ECF No. 278). In its Order, the Court observed that Tudor's reconsideration motion did not present new arguments or evidence in support of reinstatement (*id.*).

On February 27, 2017, Tudor moved for reconsideration of reinstatement again and moved in the alternative for front pay (ECF No. 279). In that motion, Tudor presented new evidence to the Court, specifically calling attention to Tudor's successful submission of a presentation proposal for a conference at Southeastern to be held on March 10, 2018. Tudor also supplied the Court with a copy of her proposal (ECF No. 279-1) and a copy of the event program showing Tudor's scheduled presentation (ECF No. 279-2). In that motion, Tudor argued that Southeastern's warm invitation to her to present at the conference evidences an absence of extreme hostilities precluding reinstatement. Tudor also supplied a declaration attesting that she looked forward to the presentation and did not fear a return to Southeastern (ECF No. 279-3 ¶¶ (a)–(g)). Tudor also supplied a declaration from Dr. Cotter-Lynch who confirmed the import of the conference to Southeastern as well as the fact that the invitation itself is evidence of the absence of extreme hostilities (ECF No. 279-4 ¶¶ 4(a)–(f)).



**RELIEF REQUESTED**

Dr. Tudor wishes to supplement her earlier filed motion requesting reconsideration of reinstatement (ECF No. 279). Tudor desires to present the Court with additional evidence, not previously available, which shows that there are no extreme hostilities at Southeastern precluding reinstatement at this time.

Specifically, Tudor wishes to present the following exhibits and accompanying arguments:

***Tudor Declaration.*** Tudor's declaration, attached hereto as **Exhibit 1**, appraises the Court of Tudor's experience attending and her well-received presentation at the March 10, 2018 conference at Southeastern. The declaration provides crucial insights into the current climate at Southeastern and other issues pertinent to reinstatement.

Among other things, the declaration evidences that: Tudor did not encounter any hostilities at Southeastern during the March 10, 2018 conference; Tudor is capable of warm and collegial interactions with a wide swath of tenured and untenured faculty at Southeastern, including members of the English Department who have not previously been deposed, offered testimony, or given statements in this matter; Tudor faced no impediments to using a multi-stall women's restroom on Southeastern's campus on March 10, 2018; Tudor and Southeastern have the capacity to collegially work together

as shown by Tudor's invited and well-received presentation on March 10, 2018; the Southeastern faculty does not find the quality of Tudor's teaching to be lacking as evidenced by Tudor's invitation to present and the faculty's reception to Tudor's presentation at the March 10, 2018 conference; this litigation has not poisoned relations between Tudor and her Southeastern colleagues as evidenced by the invitation to Tudor to present and the faculty's reception to Tudor's presentation at the March 10, 2018 conference; and Tudor does not harbor any will-ill towards Southeastern or fear returning to Southeastern.

*Photographs of Tudor taken at the March 10, 2018 conference.* The Order denying reinstatement (ECF No. 275) was keenly focused on supposed negative consequences for Tudor and Southeastern if Tudor were to return to campus. Specifically, the Order predicted that, based on evidence available at the time, Tudor would face opposition and extreme hostilities if she returned to the Southeastern campus.

However, photographs taken of Tudor at the March 10, 2018<sup>1</sup> conference evidence that there are no extreme hostilities towards Tudor on campus and that it is, in fact, possible if not likely that Tudor will be warmly welcomed back if reinstated. The first photograph (attached hereto as **Exhibit**

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<sup>1</sup> The undersigned attests that Exhibits 2 and 3 are true and accurate copies of photographs taken by Dr. Stanley Alluisi, tenured professor and Chair of Aviation Management at Southeastern, which Dr. Alluisi publicly posted to Facebook on March 11, 2018.

2) shows Tudor smiling and enjoying herself in the middle of her presentation. The second photograph (attached hereto as **Exhibit 3**) shows Tudor conversing with Dr. Karl Finkle (a tenured Professor of Mathematics at Southeastern) and Dr. Jacque Hocking (an invited guest and tenured professor at the University of Central Oklahoma).

The two photographs put to rest the concerns raised by the Order denying reinstatement (ECF No. 275). The photographs show that Tudor's first official return to the Southeastern campus since her departure in May 2011 was totally devoid of hostilities. Indeed, the photographs show that Tudor enjoyed her time back on campus and that Southeastern faculty and broader community collegially engaged with Tudor and made her feel welcome.

### **DEFENDANTS' OPPOSITION**

Counsel for Dr. Tudor notified counsel for Defendants about their intent to file this Motion via email on March 12, 2018 and requested Defendants' position as well as a rationale for opposition if opposed. Defendants counsel, Ms. Dixie Coffey, responded via email that same day that Defendants oppose this Motion. No rationale for Defendants' opposition was provided.



Dated: March 12, 2018

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

# Exhibit 1

## DECLARATION OF DR. RACHEL JONA TUDOR

1. I still desire to be reinstated as an Associate Professor with tenure at Southeastern Oklahoma State University (“Southeastern”). Reinstatement remains my preferred remedy.
2. On March 10, 2018, I gave an invited presentation at an important Oklahoma-wide conference of the American Association of University Professors (“AAUP”) hosted by and convened on the Southeastern campus. I also attended all sessions of the conference that day and had the opportunity to repeatedly and collegially interact with Southeastern colleagues as well as other invited guests.
3. **Transportation to the conference.** I got a ride to the conference from McKinney, Texas to Southeastern’s campus in Durant, Oklahoma from Dr. Meg Cotter-Lynch. Dr. Cotter-Lynch and I continue to have a strong friendship and collegial working relationship. I very much appreciate Dr. Cotter-Lynch’s continued support and her efforts to ensure that I was able to get to the conference given my current transportation limits.
4. **Conference highlights.**
  - a. During the conference, I had opportunities to interact and speak with many members of the Southeastern faculty and community, including but not limited to: Dr. Stanley Alluisi (Chair and



tenured Professor of Aviation Management), Dr. Dan Althoff (tenured Professor of English, Humanities, and Languages), Dr. Blythe Duell (tenured Associate Professor of Behavioral Sciences), Dr. Karl Finkel (tenured Professor of Mathematics), Ms. Carolyn Fridley (instructor of English, Languages, and Humanities), Dr. William Fridley (tenured Professor of Education), Dr. Elbert Hill (emeritus tenured Professor of English, Languages, and Humanities), Ms. Marion Hill (respected Southeastern community member), Dr. Tara Hembrough (Assistant Professor of English, Humanities, and Languages), Dr. Amy Madewell (Assistant Professor of Biological Sciences), Dr. Jesse Snowden (emeritus President of Southeastern), and Dr. Doug Wood (tenured Professor of Biological Sciences). All of these interactions were warm and collegial. I at no time felt like there were hostilities or that I was unwelcome at Southeastern. Indeed, quite the opposite. It felt like each person I interacted with made an effort to let me know that I was welcome.

- b. I attended all presentations at the March 10, 2018 conference, including the thoughtful opening remarks given by President Sean Burrage. Unfortunately, Dr. Burrage had to leave the

conference immediately after his remarks, so I was unable to speak with him at length. I did, however, wave at President Burrage and he acknowledged me with a nod and smile as he arrived at the conference immediately prior to giving his remarks. I did not sense any hostilities from President Burrage.

- c. I gave my presentation entitled “The Faculty Appellate Committee’s Role in Assuring Equity in Academic Freedom and Shared Governance” as planned in the afternoon session.
- d. It felt good to be back at Southeastern teaching and sharing my expertise and experiences with my colleagues and invited guests.
- e. I have had no doubts since my separation that, if given the opportunity, that I would want to return to Southeastern. My presentation experience affirmed my deeply held belief that my return to Southeastern would be a healthy and successful reunion.
- f. I recall that, during my presentation, I felt rejuvenated and enthusiastic about both my presentation topic and about the opportunity to interact with my Southeastern colleagues once again. I recall that I repeatedly smiled during my presentation in part because I felt so comfortable and it felt so good to be back at Southeastern.

- g. My presentation was well received.
- h. During the question and answer portion of my presentation, I fielded questions and comments from Dr. Finkle, Dr. Cotter-Lynch, Dr. Fridley, Dr. Wood, and Dr. Snowden. All of the comments and questions were collegial and thought-provoking. No commentator attacked me or expressed negative feelings towards me.
- i. I would like to draw particular attention to the comments of Dr. Jesse Snowden during the question and answer session. Dr. Snowden used this opportunity to constructively remark that, he personally believed that tenure candidates should be given rationales if there is a recommendation that tenure be denied. Dr. Snowden also remarked that, during his term as interim President, he always provided rationales to candidates for his decisions. I perceived Dr. Snowden's remarks to be both respectful and collegial. Indeed, I was struck by Dr. Snowden's thoughtful contribution. I did not find Dr. Snowden's comments to be hostile.
- j. After my presentation, invited guest Dr. Jacque Hocking from the University of Central Oklahoma came up to me to praise my presentation. Among other things, Dr. Hocking expressed her



support for me and my continued efforts to return to Southeastern.

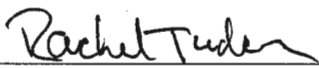
- k. Mid-day, I used a multi-stall women's restroom on the Southeastern campus without issue. This was the first time I have ever used a multi-stall women's restroom at Southeastern. I did not fear using the women's restroom at Southeastern given my understanding that Southeastern has changed its restroom rules since my departure in May 2011. As I entered the restroom I was accompanied by female English Department professor Dr. Hembrough, whom also needed to use the facilities. Dr. Hembrough and I both used the facilities without issue and then returned to the conference. Based upon my interactions with Dr. Hembrough, my use of the women's restroom was a nonissue for her.
  - l. During the conference, Dr. Alluisi took photographs. Shortly thereafter, Dr. Alluisi publicly posted his photographs to Facebook. I appear in a number of Dr. Alluisi's photographs.
5. **Transportation home from the conference.** I got a ride from the conference back to McKinney, Texas from Dr. Madewell. Dr. Hembrough also travelled with us part of the way from Southeastern's campus to her home in Durant, Oklahoma. I had a pleasant ride with

Drs. Madewell and Hembrough. Among other things, we discussed goings on in Dr. Madewell's department, Dr. Hembrough shared news about developments in the English Department and what it might look like if I am reinstated, as well as other matters. I felt very comfortable during the ride back home with Drs. Madewell and Hembrough. I did not sense any hostilities from Drs. Madewell or Hembrough.

6. **My takeaways.** Though it has been many years since I have taught at Southeastern, my experience at the conference was wonderful and affirmed my belief that my return to Southeastern would be a smooth one.

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

Executed on (date) March 12, 2018 in (location) Plano, Texas

  
\_\_\_\_\_  
Dr. Rachel Jona Tudor



# Exhibit 2



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  
OPPOSED MOTION TO SUPPLEMENT ECF No. 279**

Pursuant to Local Rule 7.1(k) Dr. Tudor moves to supplement her earlier filed motion for reconsideration of reinstatement, or, in the alternative, front pay (ECF No. 279) with additional materials pertinent to the reinstatement remedy which were unavailable at the time of filing.

**BACKGROUND**

Dr. Tudor prevailed at her jury trial on two counts of discrimination and one count of retaliation (ECF No. 262). Tudor desires to be reinstated to Southeastern Oklahoma State University (“Southeastern”) as an Associate



Professor with tenure in the English, Humanities, and Languages Department (“English Department”).

*Previous requests and briefing on reinstatement.* On December 11, 2017, Tudor submitted a timely motion requesting reinstatement (ECF No. 268). At the time, Tudor presented new evidence and pointed to record evidence showing that she is legally entitled to reinstatement and that there are no extreme hostilities at Southeastern precluding reinstatement.

On January 29, 2018, the Court denied reinstatement (ECF No. 275). The Order turned in part on the finding that (1) English Department Chair Dr. Randy Prus expressed concerns regarding Tudor’s scholarly productivity in the past (*id.* at 4), (2) that Defendants represented to the Court that Tudor “does not appear to have published anything in the last six years” (*id.*), and (3) if Tudor were to return to Southeastern without additional publications that the environment might be hostile because Tudor may be considered “unworthy” (*id.*). The Order’s findings of fact heavily relied upon representations made by Dr. Randy Prus via declaration (ECF No. 270-15). *See generally* ECF No. 275 at 3–4 (repeatedly referencing representations made in the Prus declaration).

On February 9, 2018, Dr. Tudor requested that the Court reconsider reinstatement as a remedy (ECF No. 276). In her request, Tudor pointed to findings of fact inconsistent with the record (*id.* at 1–16), conflicts with

binding precedent (*id.* at 16–21), and equitable considerations (*id.* at 21–25) meriting reconsideration. Therein, Tudor also advised of changes in circumstance (*id.* at 25), including Tudor’s plans to submit articles for publication.

On February 12, 2018, the Court denied Tudor’s request for reconsideration of reinstatement (ECF No. 278). In its Order, the Court observed that Tudor’s reconsideration motion did not present new arguments or evidence in support of reinstatement (*id.*).

On February 27, 2017, Tudor moved for reconsideration of reinstatement again and moved in the alternative for front pay (ECF No. 279).

On March 12, 2018, Tudor moved to supplement her motion for reconsideration of reinstatement or, in the alternative front pay (ECF No. 280). In that motion, Tudor sought to add three exhibits all of which show that there were no extreme hostilities at Southeastern precluding reinstatement at this time. That motion is still pending.

### **RELIEF REQUESTED**

Dr. Tudor wishes to supplement her earlier filed motion requesting reconsideration of reinstatement (ECF No. 279). Tudor desires to present the Court with additional evidence, not previously available, which shows that

Tudor is a productive scholar and thus the Court's previous finding that Tudor's return to Southeastern is impossible because she would be deemed "unworthy" due to her publication dry spell should be revisited. Tudor also desires to present the Court with new evidence which calls into question the accuracy of (and ultimately, the weight that should be afforded to) representations made by Dr. Randy Prus via sworn declaration in connection with Dr. Tudor's bid for reinstatement.

Specifically, Tudor wishes to present the following exhibits and accompanying arguments:

*New Scholarship and Service.* On March 19, 2018, Tudor received notice that an article she submitted to *Language, Literature, and Interdisciplinary Studies*—a peer review journal—was published. A true and accurate copy of Tudor's published article is attached hereto as **Exhibit 1**. Tudor's article, entitled "Exiles in Our Own Land: Native American Novelists," is twelve (12) formatted pages in length. Additionally, on March 19, 2018, Tudor received a certificate confirming her service as a peer reviewer from the editor of *Language, Literature, and Interdisciplinary Studies*. (Tudor served as a peer reviewer of an article written by another professor submitted for consideration to the journal.) A true and accurate copy of the certificate Tudor received is attached hereto as **Exhibit 2**.



Tudor believes that this new evidence is relevant to this Court's reconsideration of reinstatement because **Exhibit 1** speaks to Tudor's scholarly productivity and **Exhibit 2** speaks to Tudor's continued service, in a scholarly capacity, to her profession.

In initially denying reinstatement, the Court found that Dr. Prus' past concerns about Tudor's publication frequency, in light of Tudor's publication dry spell, may lead Prus and others at Southeastern to deem Tudor to be "unworthy" if she were to return to Southeastern (ECF No. 275 at 4). However, Tudor's latest article should allay any concerns about such hostilities. Plainly, there is no reason to deem Tudor "unworthy" due to her publication dry spell since, as **Exhibit 1** evidences, the dry spell is over. Tudor's service as a peer reviewer for an academic journal, as **Exhibit 2** shows, should similarly allay any concerns regarding Tudor's continued capacity for scholarly service to her profession.

***Southeastern job announcement.*** On March 16, 2018, the undersigned discovered that Southeastern's English Department posted an advertisement seeking applications for a new tenure-track position to teach, *inter alia*, "World Literature, Humanities, and/or Writing courses." A true and accurate copy of the advertisement is attached hereto as **Exhibit 3**.

Tudor believes this new evidence is relevant to this Court's reconsideration of reinstatement because **Exhibit 3** calls into question the

overall accuracy of representations made in the Prus declaration (ECF No. 270-15), which the Court relied upon in initially denying reinstatement.

Key components of the Prus declaration directly conflict with **Exhibit 3**. For example, the Prus declaration indicates that Tudor should not be reinstated because the English Department does not have a need for any additional professors and there is no budget for additional professors of any kind in the Department.<sup>1</sup> Yet, **Exhibit 3** shows that the English Department presently seeks to hire a new professor to teach a wide swath of classes in the Department, including categories of classes that Tudor formerly taught at Southeastern.

Given the centrality of the Prus declaration to the reinstatement question, and the irreconcilable conflicts between the Prus declaration and **Exhibit 3**, the Court should revisit whether Defendants have met their burden of showing that Tudor's reinstatement is in fact infeasible. Defendants purported to satisfy their evidentiary burden almost solely via proffer of the Prus declaration. Defendants also repeatedly invited the Court to discount Tudor's other evidence which conflicted with the Prus declaration, arguing that the Court should rely on Prus' knowledge of the English

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<sup>1</sup> See ECF No. 270-15 ¶ 4 (Declaration of Dr. Prus: "As the current Chair of the EHL Department at Southeastern Oklahoma State University, part of my duties involves assigning faculty members to teach certain classes and subjects. At present, there is no need for an additional professor, let alone an additional tenured professor, in the EHL Department. Further, there is no available budget for an additional professor.").

Department and its needs and Prus' supposed penchant for accuracy and good judgment.<sup>2</sup> However, the irreconcilable conflicts between the Prus declaration and **Exhibit 3** counsel in favor of reweighing the Prus declaration. At minimum, **Exhibit 3** is strong evidence that discrete portions of the Prus declaration are inaccurate, which warrants discounting otherwise uncorroborated portions of the same. *See, e.g., NLRB v. Pittsburgh S.S. Co.*, 337 U.S. 656, 659 (1949) (“Thus, in the determination of litigated facts, the testimony of one who has been found unreliable as to one issue may properly be accorded little weight as to the next.”).

### DEFENDANTS' OPPOSITION

Counsel for Dr. Tudor notified counsel for Defendants about their intent to file this Motion via email on March 19, 2018 and requested Defendants' position as well as a rationale for opposition if opposed. Defendants' counsel, Ms. Kindy Jones, responded via email that same day that Defendants oppose this Motion. No rationale for Defendants' opposition was provided.

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<sup>2</sup> *See, e.g.,* ECF No. 270 at 6 (“No one else in this litigation has the benefit of the insights held by Dr. Prus. Trust Dr. Randy Prus' professional judgment.”); ECF No. 274 at 3 (“Dr. Prus' quiet, but direct evidence, offered in a peaceful but unrefuted way, should be given more weight than [evidence presented by Tudor].”).



Dated: March 19, 2018

/s/ Ezra Young  
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**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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