

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.)	

**MR. EZRA YOUNG AND MS. BRITTANY NOVOTNY'S NOTICE
CONCERNING THE APPELLATE PROCESS AND
FORTHCOMING SUPPLEMENTAL MOTIONS**

To the Court:

This Court previously granted us permission to participate in proceedings pertaining to attorneys' fees and costs (ECF No. 352). In that limited capacity, we write to advise the Court, pursuant to its October 2018 order (ECF No. 345), that on September 13, 2021, Plaintiff's appeal and Defendants' cross-appeal were decided by the U.S. Court of Appeals for the Tenth Circuit. The Tenth Circuit's opinion and judgment were docketed that same day in this Court as ECF No. 357 and ECF No. 358, respectively.

We also write to advise this Court of our intention to file supplemental motions for attorneys' fees and costs. Our previous filings in this Court covered fees and costs accrued at the trial level as of June 20, 2018. *See* Motion for Fees and Costs, ECF No. 303 (seeking attorneys' fees and costs recovered as fees for trial court work billed and funds expended through June 20, 2018); ECF No. 339 (taxing costs payable by Defendants to the Law Office of Ezra Young for taxable costs accrued through June 20, 2018, in the amount of \$11,117.94). We intend to supplement those filings to seek compensation for work performed and costs that should be reimbursed for work done at the trial court level after June 20, 2018, and all work and costs accrued in conjunction with the appeal and cross-appeals to the Tenth Circuit as directed by that Court. *See* ECF No. 357 at 55 (finding that Dr. Tudor is the prevailing party "below and on both appeals" and remanding to this Court the appropriate fees due for the trial and appellate court proceedings).

Lastly, we advise that if an alternative direction is not given by this Court, we intend to file our supplemental motions for fees and costs on Monday September 27, 2021, fourteen days after the Tenth Circuit's judgment issued.

Dated: September 24, 2021

/s/ Ezra Young

Ezra Young (NY Bar No. 5283114)

LAW OFFICE OF EZRA YOUNG

210 North Sunset Drive

Ithaca, New York 14850

(949) 291-3185

ezra@ezrayoung.com

/s/ Brittany M. Novotny

Brittany M. Novotny (OK Bar No. 20796)

NATIONAL LITIGATION LAW GROUP, PLLC

2401 NW 23rd St., Ste. 42

Oklahoma City, OK 73107

(405) 896-7805

bnovotny@nationlit.com

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2021, 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)