

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.)	

RESPONSE TO DEFENDANTS’ MOTION FOR STAY

Late last night, Defendants moved to stay all motions pending before this Court on the representation that they wish to privately negotiate or mediate this matter, including resolution of outstanding motions for fees and costs filed by the undersigned. We do not oppose such a stay under two conditions:

- (1) The undersigned are included in any private negotiations and/or mediation resolving our entitlement for fees and costs. This would ensure private efforts to resolve this case accords with this Court’s

February 2020 order (ECF No. 352) which directs that we are permitted to directly participate in fees and costs proceedings.

- (2) Our outstanding motion for sanctions against Attorney Jillian Weiss (ECF No. 383) is not stayed. Staying that motion is improper because it grieves misconduct by Weiss that cannot be resolved by a private settlement and, to date, Weiss continues to refuse to take actions to cure her misconduct.

Dated: November 23, 2021

/s/ Ezra Young

Ezra Young (NY Bar No. 5283114)

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/s/ Brittany M. (Novotny) Stewart

Brittany M. (Novotny) Stewart

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CERTIFICATE OF SERVICE

I hereby certify that on November 23, 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)