

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

RACHEL TUDOR,

Plaintiff,

v.

SOUTHEASTERN OKLAHOMA STATE  
UNIVERSITY, and

THE REGIONAL UNIVERSITY  
SYSTEM OF OKLAHOMA,

Defendants.

**Case No. 15-cv-324-C**

**DEFENDANTS' MOTION TO STAY RESPONSE DEADLINE**

Defendants, Southeastern Oklahoma State University, ("SEOSU"), and the Regional University System of Oklahoma ("RUSO"), ("Defendants"), request the Court stay Plaintiff's Motion for Recalculation of Damages. [Doc. 377]. In support of their motion, Defendants show the Court as follows:

1. On November 2, 2021, in accordance with this Court's Order [Doc. 366], Plaintiff filed her Motion for Recalculation of Damages. [Doc. 377]. In her motion, Plaintiff seeks recalculation of front pay and back pay.

2. This Court previously stayed the numerous unresolved Motions for Attorney's Fees, pending resolution of the appellate process:

[T]he Court is persuaded the appropriate action is to stay resolution of the issue pending completion of the appellate process. Given the complexity of the issue, it is a waste of judicial resources and the parties' resources to parse out who is entitled to what when there is a possibility that an appellate court will render the entire issue moot.

[Doc. 345].

3. The Court's prior rationale for staying the pending motions for attorney fees is applicable to Plaintiff's Motion for Recalculation of Damages.

4. Defendants' response to Plaintiff's Motion for Recalculation of Damages is due January 3, 2022. [Doc. 386]. Defendants' response date was based upon the prior December 13, 2021 deadline to file a Petition for Certiorari.

5. The appellate process has not yet concluded. Defendants filed a motion for extension to file a petition for a writ of certiorari in the Supreme Court and were granted an extension of thirty (30) days until January 12, 2022. Thus, the appellate process will conclude either when Defendants decline to file a petition for certiorari, when such a petition is denied, or when such a petition is granted and the case is decided.

6. There will be no impact on any scheduled deadlines if the stay is granted.

7. Counsel for Defendants' office has spoken with Plaintiff's counsel, but she has not heard back from her Plaintiff as to any objection to the requested relief.

8. Moreover, Defendants are hopeful that all issues can eventually be resolved in a settlement or mediation, rather than through adversarial briefing before this Court. Such a possibility would be enhanced by a stay of all motions at this juncture.

For the reasons set forth above, Defendants respectfully request this Court stay Defendants' response to Plaintiff's Motion for Recalculation of Damages until the appellate process has been completed and after settlement conference has been completed.

Respectfully submitted,

/s/ Dixie L. Coffey

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*Attorneys for Defendants Southeastern Oklahoma State*

*University and The Regional University System of*

*Oklahoma*

**CERTIFICATE OF SERVICE**

I certify that on this 3rd day of January 2022, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing; and via ECF Notice to all counsel who are registered participants.

/s/Dixie L. Coffey

Dixie L. Coffey