

**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

UNOPPOSED MOTION TO AMEND SCHEDULING ORDER

Defendants, Southeastern Oklahoma State University, (“SEOSU”), and the Regional University System of Oklahoma (“RUSO”), (“Defendants”), request the Court amend the April 8, 2022 Scheduling Order. In support of their motion, Defendants state the following:

1. Pursuant to the Court’s Order of March 29, 2022 [Doc. 402], the parties submitted a Joint Scheduling Order, which the Court entered on April 8, 2022. [Doc. 404].
2. Since the last settlement conference conducted by Magistrate Erwin on March 24, 2022, the parties have actively continued settlement discussions and have made significant progress. The parties believe that they may likely reach settlement within the next thirty (30) days.
3. In addition, there is outstanding discovery to Plaintiff for all documentation supporting the motions for attorney fees. Prior counsel for Plaintiff, Ezra Young, has not yet produced this documentation to Plaintiff’s current counsel, and therefore it has not yet been produced to Defendants.

4. The following deadlines are currently set:

<u>Deadline</u>	<u>Due Date</u>
Defendants' response to Plaintiff's First Motion for Attorney Fees for the Law Office Jillian Weiss [Doc. 301]	May 5, 2022
Defendants' response to Plaintiff's First Motion for Attorney Fees filed by Ezra Young [Doc. 303]	May 5, 2022
Defendants' response to Application to Join in Plaintiff's Fee Request by Former Counsel, Transgender Legal Defense and Education Fund [Doc. 306]	May 5, 2022
Plaintiff's replies to Defendants' responses to Motions for Attorney Fees	May 16, 2022
Defendants' response to Plaintiff's Motion and Incorporated Brief for Prejudgment Interest, Post-Judgment Interest and Tax Penalty Offset [Doc. 311]	May 26 , 2022
Defendants' response to Plaintiff's Motion for Recalculation of Damages [Doc. 377]	May 26, 2022
Plaintiff's reply to Defendants' response to Plaintiff's Motion and Incorporated Brief for Prejudgment Interest, Post-Judgment Interest and Tax Penalty Offset	June 6, 2022
Plaintiff's reply to Defendants' response to Motion for Recalculation of Damages	June 6, 2022

5. A thirty (30) day extension will allow the parties to focus on settlement and hopefully avoid additional adversarial briefing before this Court. Such a possibility would be enhanced by the requested extension.

6. In addition, Defendants move to strike the two deadlines relating to Prejudgment Interest, Post-Judgment Interest and Tax Penalty Offset because these amounts

depend upon the total amount of Plaintiff's damages, which have not yet been determined by the Court.

7. The undersigned have discussed this motion with counsel for Plaintiff, and Plaintiff has no objection to this motion.

8. The proposed new deadlines are as follows:

<u>Deadline</u>	<u>Due Date</u>
Defendants' response to Plaintiff's First Motion for Attorney Fees for the Law Office Jillian Weiss [Doc. 301]	June 6, 2022
Defendants' response to Plaintiff's First Motion for Attorney Fees filed by Ezra Young [Doc. 303]	June 6, 2022
Defendants' response to Application to Join in Plaintiff's Fee Request by Former Counsel, Transgender Legal Defense and Education Fund [Doc. 306]	June 6, 2022
Plaintiff's replies to Defendants' responses to Motions for Attorney Fees	June 15, 2022
Defendants' response to Plaintiff's Motion and Incorporated Brief for Prejudgment Interest, Post-Judgment Interest and Tax Penalty Offset [Doc. 311]	Stricken
Defendants' response to Plaintiff's Motion for Recalculation of Damages [Doc. 377]	June 27, 2022
Plaintiff's reply to Defendants' response to Plaintiff's Motion and Incorporated Brief for Prejudgment Interest, Post-Judgment Interest and Tax Penalty Offset	Stricken
Plaintiff's reply to Defendants' response to Motion for Recalculation of Damages	July 6, 2022

For the reasons set forth above, Defendants respectfully request this Court extend certain deadlines for thirty (30) days, as set forth above, and strike certain deadlines relating to

Prejudgment Interest, Post-Judgment Interest and Tax Penalty Offset until the total amount of Plaintiff's damages has been determined, in the event the parties are unable to reach settlement.

Respectfully submitted,

/s/ Dixie L. Coffey

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*Attorneys for Defendants Southeastern Oklahoma State
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CERTIFICATE OF SERVICE

I certify that on this 2nd day of May 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