



OFFICE OF ATTORNEY GENERAL  
STATE OF OKLAHOMA

February 9, 2018

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**Via U.S. Postal Service, Facsimile Transmission, and Electronic mail**

**Re:** *Christopher Barnett v. Tulsa Community College*, Tulsa County  
District Court, Case No. CV-17-832

Dear Counsel,

On January 5, 2018, we served upon you, via Certified Mail, Defendant's First Set of Discovery Requests. Plaintiff's responses were due no later than February 7, 2018, pursuant to OKLA. STAT. tit. 12, §§ 3233(A), 3234(B)(2)(a) and 3236(A). As of the date of this letter, you have failed to answer this discovery, or provide proper objections to the Interrogatories and Requests for Production of Documents in accordance with OKLA. STAT. tit. 12, §§ 3233(A) ("The party upon whom the interrogatories have been served shall serve a copy of the answers, and objections if any, within thirty (30) days after the service of the interrogatories.") and 3234(B)(2)(b) ("For each item or category, the response shall either state that inspection and related activities will be permitted as requested or state with specificity the grounds for objecting to the request, including the reasons.")

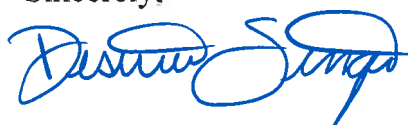
Additionally, the Requests for Admission are now deemed admitted, pursuant to OKLA. STAT. tit. 12, § 3236(A) ("The matter is admitted unless, within thirty (30) days after service of the request, or within such shorter or longer time as the court may allow, the party to whom the request is directed serves upon the party requesting the admission a written answer or objection addressed to the matter, signed by the party or by the party's attorney.")

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Please provide written responses to Defendant's First Set of Discovery Requests no later than February 16, 2018. In an effort to resolve this issue without court involvement, we are available to meet and confer at a mutually agreed upon date and time either by telephone or in person at the Office of the Attorney General in Oklahoma City, Oklahoma. Any matters upon which we cannot reach an agreement we will seek to resolve via a Motion to Compel Discovery, pursuant to OKLA. STAT. tit. 12, § 3237(A).

Thank you for your prompt attention to this matter and we look forward to hearing from you soon.

Sincerely,

A handwritten signature in blue ink, appearing to read "Desiree Singer". The signature is fluid and cursive, with the first name "Desiree" and the last name "Singer" clearly distinguishable.

Desiree Singer  
Assistant Attorney General