



IN THE DISTRICT COURT OF PAYNE COUNTY
STATE OF OKLAHOMA

INDEPENDENT SCHOOL DISTRICT NO. I-101 OF PAYNE COUNTY, OKLAHOMA
a/k/a GLENCOE PUBLIC SCHOOL;
GARRETT SCHUBERT;
KIP RACY, *as father and next friend of Cameron Racy, a minor*; ASHLEY BATES, *as mother and next friend of Preston Bates, a minor*; MENDY GARFIELD, *as mother and next friend of Hollis Garfield, a minor*; and GARY KENT ROSSANDER II, *as father and next friend of Gary Kent Rosander III, a minor*,

Plaintiffs,

v.

OKLAHOMA SECONDARY SCHOOL
ACTIVITIES ASSOCIATION,

Defendant.

IN THE DISTRICT COURT OF
Payne County, Oklahoma
FILED
SEP 17 2025
By:  ALLEN, Court Clerk
Deputy

Case No. CJ-2025-324

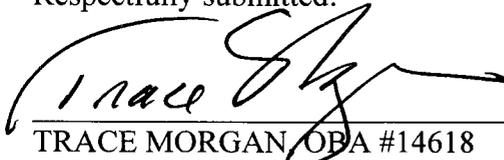
Honorable Judge Michael Kulling

LETTER OF COMPROMISE

Comes now the Plaintiffs, by and through their attorneys of record and submits this Letter of Compromise, attached hereto as Exhibit "1".

Dated this 17 day of September, 2025.

Respectfully submitted:



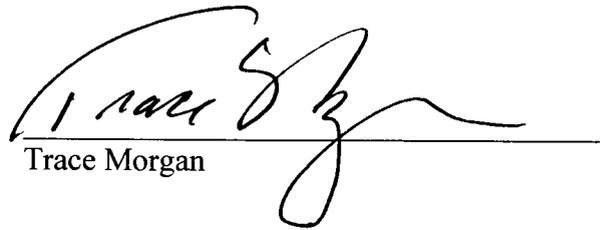
TRACE MORGAN, OBA #14618
Morgan Law Office, PLLC
400 South Duck Street, Suite 201
Stillwater, OK 74074
(405) 377-4200 – Telephone
Trace@Morganlawoffices.net
Attorney for Plaintiffs

CERTIFICATE OF MAILING

I, TRACE MORGAN, hereby certify that on the 17 day of September, 2025, a true and correct copy of the above and foregoing Letter of Compromise, was mailed first class via United States Postal Service, postage prepaid to the following:

Oklahoma Secondary School Activities Association
c/o David Jackson, Executive Director
7300 Broadway Extension
Oklahoma City, OK 73113

Kayci B. Hughes
Crowe & Dunlevy
222 North Detroit Avenue, Suite 600
Tulsa, OK 74120
Attorney for Defendant


Trace Morgan

WB
WHITTEN BURRAGE

September 16, 2025

Oklahoma Secondary School Activities Association "OSSAA"
c/o Kayci B. Hughes, Esq.
CROWE & DUNLEVY
222 N. Detroit Ave., Suite 600
Tulsa, OK 74120
Oklahoma City, OK 73102

Re: GLENCOE V. OSSAA; CJ-2025-324

Dear Counsel for OSSAA,

As you are aware, the Court, in granting our temporary restraining order, opined that Plaintiffs are likely to succeed in this case on the merits. Plaintiffs are willing to dismiss its lawsuit against the OSSAA if the OSSAA agrees to all of the following terms:¹

1. Agree to convert the temporary restraining order into a permanent injunction, allowing the four minors to play any varsity sports with Coach Schubert at Glencoe High School for the 2025-2026 school year;
2. Agree that all Plaintiffs will not be further punished by the OSSAA for complying with the Court's temporary restraining order;
3. Agree that all Plaintiffs will not be further punished by the OSSAA for complying with this letter;
4. Agree that all Plaintiffs will not be punished in the 2026-2027 school year for participation in the team camp in May of 2025;
5. Agree that this letter is explicitly not confidential, and Plaintiffs intend to inform the Court of this letter and file it in the public record;
6. Agree there is no punishment of Garrett Schubert required for the alleged conduct and he can coach all minor students eligible at Glencoe High School;
7. Agree that Plaintiffs and Defendant may talk to the public or press about their respective position in this lawsuit and how the lawsuit is resolved.

Please respond at your earliest convenience but no later than two weeks.

Respectfully submitted,



¹ Plaintiffs additionally intend to seek attorneys' fees and costs under 23 O.S. § 103.