

UNITED STATES DISTRICT COURT

for the

Eastern District of Texas



Deposition Exhibit

Nita Cullen 5/18/21

Timothy Jackson

Plaintiff

v.

Laura Wright, et al.

Defendant

Civil Action No. 4:21-CV-33-ALM

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

Peter Kohanski  
426 Audra Lane Apt. H; Denton, Texas 76209-6339

(Name of person to whom this subpoena is directed)

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must promptly confer in good faith with the party serving this subpoena about the following matters, or those set forth in an attachment, and you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about these matters:

Place: Cutler Smith  
12750 Merit Drive  
Suite 1450  
Dallas, TX 75251

Date and Time: 05/18/2021 9:00 am

The deposition will be recorded by this method: stenographically.

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

See attached Exhibit A

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 04/28/2021

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party)

Timothy Jackson

who issues or requests this subpoena, are:

Jonathan F. Mitchell, 111 Congress Avenue Suite 400, Austin, Texas, 78701; (512) 686-3940

Michael Thad Allen, PO Box 404, Quaker Hill, CT 06375; (860) 772-4738

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 4:21-CV-33-ALM

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)*  
on *(date)*

☒ I served the subpoena by delivering a copy to the named individual as follows: *Peter Kohanski*

on *(date)* *April 30, 2024* ; or

☐ I returned the subpoena unexecuted because:

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$

My fees are \$

for travel and \$

for services, for a total of \$

*75.<sup>00</sup>*  
~~0.00~~

I declare under penalty of perjury that this information is true.

Date:

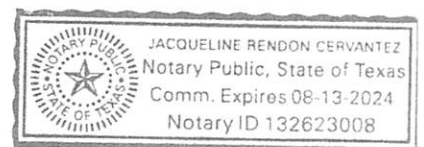
*Minnie Tyiola psc 17285 1/31/22* 6  
*(Server's signature)*

*Minnie Tyiola*  
*(Printed name and title)*

*5930 LBJ Freeway #307 Dallas TX 75240*  
*(Server's address)*

Additional information regarding attempted service, etc.:

*Minnie Tyiola*  
SWORN TO AND SUBSCRIBED BEFORE ME  
ON THIS *23* DAY OF *May* 20 *21*  
*Jacqueline Rendón*  
X



Print

Save As...

Add Attachment

Reset

## Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

### (d) Protecting a Person Subject to a Subpoena: Enforcement.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) *Contempt.*

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

## EXHIBIT A

### Documents to Be Produced

#### I. Definitions and Instructions

1. Each request shall operate and be responded to independently and, unless otherwise indicated, no request limits the scope of any other request.

2. Unless otherwise indicated, the relevant time period for these requests is from November 1, 2019, to the present.

3. Unless otherwise defined, the terms used should be read and construed in accordance with the English language and the ordinary meanings and definitions attached. You should, therefore: (i) construe the words “and” as well as “or” in the disjunctive or conjunctive, as necessary to make the request more inclusive; (ii) construe the term “including” to mean “including, but not limited to”; and (iii) construe the words “all” and “each” to mean all and each.

The following definitions apply to each of these requests:

- The terms “**you**” and “**your**” refer to the individual named as the deponent in the attached Subpoena, including any agent or person authorized to act for or on your behalf.
- The terms “**communication**” and “**communicate**” refer to any method used to transmit or exchange information, concepts, or ideas (whether verbal or nonverbal) including oral, written, typed, or electronic transmittal of any type of information or data, by the use of words, silence, numbers, symbols, images, or depictions, from one person or entity to another person or entity.
- The term “**document**” refers to the act of noting, recording, or preserving any type of information, data, or communication, without regard to the method used to note, record, or preserve such information, data, or communication. The term includes any e-mail or text message.
- The term “**entity**” means any legal entity inquired about (other than a natural person) including a partnership, professional association, joint venture, corporation, governmental agency, or other form of legal entity.

- The terms **"identify"** and **"identity,"** when used in connection with a natural person, require disclosure of that person's full name, present or last known address, and present or last known telephone number. When used in connection with a legal entity, the terms require disclosure of its legal name, its address, and telephone number.
- The terms **"implement"** and **"implementation"** refer to any method, process, or action used to put a decision or plan into effect or achieve a goal or obligation.
- The term **"information"** refers to and includes documents, records, communications, facts, ideas, data, observations, opinions, photographs, slides, video recordings, audio recordings, and tangible and intangible items and evidence of any kind or sort.
- The terms **"person"** and **"persons"** mean any legal entity inquired about, whether a natural person, partnership, sole proprietorship, professional association, joint venture, corporation, governmental agency, or other form of legal entity.
- The term **"record"** means letters, words, sounds, or numbers, or the equivalent of letters, words, sounds, or numbers, that have been written, recorded, documented, or received by Defendant by:
  - (A) handwriting;
  - (B) typewriting;
  - (C) printing;
  - (D) photostat;
  - (E) photograph;
  - (F) magnetic impulse;
  - (G) mechanical or electronic recording;
  - (H) digitized optical image; or
  - (I) another form of data compilation.
- The term **"record"** also includes any communication, including an e-mail or text-message communication.
- The term **"reproduction"** means an accurate and complete counterpart of an original document or record produced by:
  - (A) production from the same impression or the same matrix as the original;
  - (B) photograph, including an enlargement or miniature;
  - (C) mechanical or electronic re-recording;

- (D) chemical reproduction;
- (E) digitized optical image; or
- (F) another technique that accurately reproduces the original.

- The term “**third party**” means any person, persons, or entity other than the defendants or the attorneys of record for the defendants.
- The terms “**and**” and “**or**,” when used in these definitions and in the discovery requests, include the conjunction “and/or.”

## **II. Documents Requested**

**Request No. 1:** A reproduction of each record constituting a communication (including all attachments or exhibits) that implements, mentions, discusses, or contains any information concerning Timothy Jackson, the Center of Schenkerian Studies, or the Journal of Schenkerian Studies, including but not limited to communications with the “ad hoc panel” convened to investigate Timothy Jackson and the Journal for Schenkerian Studies.

**Request No. 2:** All drafts or versions of petitions or open letters that implement, mention, discuss, or contain any information concerning Timothy Jackson or the Journal of Schenkerian Studies, regardless of whether those drafts or versions of petitions or open letters were submitted to any administrative official or faculty member of the University of North Texas or otherwise published, including a list of all signatories to any such document.

**Request No. 3:** All correspondence between you and Benjamin Brand concerning Timothy Jackson, including but not limited to any alleged efforts at “whistleblowing” related to Timothy Jackson’s role on the Journal of Schenkerian Studies, the Center of Schenkerian Studies, or any allegedly racist actions or behaviors of Timothy Jackson.

**Request No. 4:** All correspondence and communications between you and any individual connected to or associated with the Society for Music Theory, including but not limited to Professor Philip Ewell and any officers of the Society for Music Theory.

Date: Wed, Jul 29, 2020 at 3:17 PM  
Subject: Email from the president of GAMuT  
To: Timothy Jackson <[shermanzelechin@gmail.com](mailto:shermanzelechin@gmail.com)>

Dear Dr. Jackson,

I received this email from the president of GAMuT earlier today. Just wanted to make you aware of this if you haven't already been informed. I have attached the letter and here is the text of the email:

Dear colleagues,

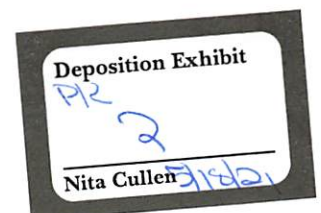
A group of us have come together and written a statement to Dean Richmond regarding recent events with the Journal of Schenkerian Studies. For your reference, it is attached. The letter will be sent to the dean before the end of the week. We have decided not to sign the statement anonymously, but rather list our names at the end. To this end, I write to ask all of you if you would like your names included. Since we are moving quickly, please **read the letter and respond as soon as you are able.**

If you would like your name on the statement, please respond "**Yes, I would like my name included on the statement.**" If you would prefer not to have your name on the statement, please respond "**No, please do not put my name on the statement.**"

We are going to do everything in our power to ensure Dean Richmond keeps the signatories anonymous if it becomes necessary for him to circulate the letter. That being said, no one will think less of you for not signing.

Again, please respond as quickly as you can with a yes or no. Many thanks for your attention to this important matter.

All best,  
Peter Kohanski  
President, the Graduate Association of Musicologists *unt*Theorists



Dear Dean Richmond,

We, a cross-section of graduate students in the Division of Music History, Theory, and Ethnomusicology (MHTE), write to condemn the latest issue of the *Journal of Schenkerian Studies* (JSS) and address concerns that recent events have foregrounded.

We are appalled by the JSS's recent perpetuation of anti-Black racism and platforming of ad hominem attacks in response to Dr. Philip Ewell's scholarship. These egregious acts go beyond the bounds of academic discourse and require a strong, swift response from the College of Music. We call upon the CoM to dissolve the JSS, dismiss Dr. Timothy Jackson, make substantial changes to the Center for Schenkerian Studies (CSS), implement consequences for those involved in the publication of the most recent issue of the JSS, and work to foster an institutional culture within the MHTE Division and the CoM where these events could never transpire. These changes are not only necessary for the sake of UNT's reputation and the well-being of its students but are also moral imperatives that can no longer be ignored.

### **Dishonesty and a Lack of Academic Rigor in the JSS**

While we encourage the CoM to undertake a full investigation of the JSS Volume 12, we would be remiss if this document did not highlight the most reprehensible aspects of the journal.

1. **Lack of peer review:** The call for papers gave a two-week deadline for responses; all papers were accepted, without asking for substantial edits; papers were in some cases given only a five-day turnaround once notified of their acceptance to the journal; and the deadlines were selectively enforced, which allowed more anti-Ewell submissions to be accepted.
2. **Illicit collaboration.** After coopting the JSS in order to mount an attack on Dr. Ewell, Dr. Jackson proceeded to solicit responses from his close Schenkerian colleagues. The result of this solicitation and coordination between six of the anti-Ewell papers produced a markedly skewed bias toward the anti-Ewell responses. In stark contrast to this coordinated effort by Dr. Jackson et al., Dr. Ewell was neither notified nor asked to respond, as is standard academic practice.
3. **Editorial missteps.** The Assistant Editor, Levi Walls, was completely powerless to edit content and ideas or to provide substantive feedback during the editorial process. In practice, Dr. Jackson exercised control over editorial decisions, a power he should not have had. Although Levi did everything within his power to prevent the publication of racist views, the implications of his title meant that he was attacked for his ostensible decision-making role in the journal. This view was compounded by online references to the JSS as a publication run by doctoral students.

### **The JSS Moving Forward**

Given the egregious behavior by the JSS and specifically by the advisory board, we urgently call for the following steps to be taken.

1. **Dissolve the JSS.** The JSS has demonstrated that it does not meet the standards of a peer-reviewed publication. The basis of academic discourse is trust and authenticity, and the JSS has violated that trust. As such, there is no reason for it to exist.

2. **Publicly condemn the issue and release it freely online to the public.** All contributors should be held fully accountable for their comments, which must not be hidden for the sake of the self-preservation of any involved parties. By making this volume accessible to the public with a disclaimer from the CoM, we hope to enable all scholars to address this problematic discourse.
3. **Provide a full, detailed, and public account of the editorial and publication process, and its failures.** The JSS must make a public account of the process so individuals who intentionally subverted academic norms can be held accountable, and so that innocent parties might be absolved of both guilt and a burden of silence.
4. **Hold accountable every person responsible for the direction of the publication.** This should also extend to investigating past bigoted behaviors by faculty and, by taking this into account, the discipline and potential removal of faculty who used the JSS platform to promote racism.
5. **Ensure that no member of the current JSS Advisory Board oversees or reviews work done by a TA or TF.** Neither Dr. Slottow nor Dr. Jackson should be permitted to oversee graduate students in any employment capacity, including supervising those who manage graduate student assistantships.

### **Calling for Dr. Jackson's Dismissal**

Dr. Jackson should be removed from the UNT faculty because he has shown that his values are diametrically opposed to those of our division, the CoM, and the university at large. He has a history of racist, sexist, and abusive behavior in his many capacities. He was removed from the oversight of the RA for the CSS due to his treatment of previous RAs. Among the issues raised were:

1. Using the CSS RA to aid with his personal research
2. Requiring student work during the summer without pay
3. Extortion through grade manipulation and threats to students' careers and reputations

These abuses were eventually addressed, but it took CoM administrators years to attempt to remedy these problems. While this included Dr. Jackson's aforementioned removal from overseeing the CSS RA, his influence over both the CSS, the JSS, and the graduate research assistantship unofficially continued. His present offenses concerning this issue of the JSS are part of a pattern of harmful behaviors that have disproportionately affected marginalized students and faculty. His reputation extends beyond UNT and affects how our division is perceived externally.

If the CoM is unable to remove Dr. Jackson from his position, these steps must be taken at a minimum:

1. **Require a formal apology and retraction.** Dr. Jackson must provide a formal apology and retract his explicit racist comments and ad hominem attacks on Dr. Ewell.
2. **Prevent power imbalances.** Given that Dr. Jackson's position has facilitated past abuses, he must be prohibited from teaching required courses, advising students, serving on committees in any capacity, or wielding power over students or faculty.
3. **Eliminate research and travel funding and prohibit involvement in UNT publications.** Funding for Dr. Jackson's research and travel must be immediately and permanently terminated so that he can no longer manipulate the power structures within UNT publications to promote his own ideas. UNT must not provide a platform for his views.

### **Addressing the MHTE Division's Culture**

Issue 12 of the JSS—both in its content and publication process—sheds light on a problematic culture within our division. Several faculty members have demonstrated through their actions a lack of understanding of issues of diversity. More concerning is the broader pattern of ineffective responses to graduate students' concerns. As illustrated in both Dr. Jackson's previous and current behaviors, problems were ignored by multiple administrators in the division and college at large. Action was only taken after these issues received broader (and especially public) attention. We recognize Dr. Brand's efforts to change our culture by initiating diversity training within our division and fostering an atmosphere where graduate students generally feel welcome when bringing issues to him, yet this has not yet led to an environment that prevents such abuses from happening. It is a start, but much work remains to be done.

With that in mind, we call on the MHTE Division and the CoM to take the following steps to critically examine and radically transform our institutional culture:

1. **Launch an investigation into the culture in UNT, the CoM, and the MHTE Division.** This investigation should take into account past concerns and remove barriers that led to inaction within the division and CoM. Specific concerns include addressing racism and sexism and serving diverse communities. A third party—such as representatives from the Division of Institutional Equity and Diversity—should oversee this investigation.
2. **Create a reporting process that ensures transparency, clarity, and protection from retaliation for graduate students within the MHTE Division and CoM.** There are many more troubling incidents that we would like to bring to your attention, and we recognize that there will be many more in the future. We look forward to the conversations necessary to bring about this institutional change.
3. **Appoint a faculty member (or faculty members or university representatives) specifically tasked with advocating for graduate students.** We call for one or more faculty members to be specifically charged with hearing graduate student concerns, corroborating those concerns, and advocating for appropriate responses both within and outside the CoM.

We call upon the MHTE Division and CoM to take these proposed actions, and we look forward to a dialogue as we work together to make UNT the best version of itself. We eagerly await your response.

Sincerely,

### EXHIBIT 3

I am sharing this statement on behalf of a cross-section of graduate students in the Division of Music History, Theory, and Ethnomusicology (MHTE) at the University of North Texas, the department which is responsible for publishing the Journal of Schenkerian Studies (JSS).

We are appalled by the journal's platforming of racist sentiments in response to Dr. Philip Ewell's plenary address at the Society of Music Theory annual meeting in 2019. Furthermore, we condemn the egregious statements written by UNT faculty members within this publication. We stand in solidarity with Dr. Philip Ewell and his goals to address systemic racism in and beyond the field of music theory.

As graduate students at UNT, we are compelled to provide further context and to demand action to effect meaningful change. We would like to make it clear that the JSS is not a graduate student journal; since 2010 (Vol. 4), it has been run primarily by Drs. Timothy Jackson and Stephen Slottow. Many of us recently discovered that the journal is presented as graduate-student run in some contexts; in fact, there is little student involvement beyond copy-editing, and students have absolutely no say in the content of the JSS. In fact, outside of the advisory board (and in particular Dr. Jackson), we have no clear understanding of who oversaw the publication of the responses to the plenary session. As we join the search for answers to these issues, we will be working both publicly and privately to change every part of the MHTE Division and College of Music (CoM) at UNT that allowed faculty to platform racism in our name.

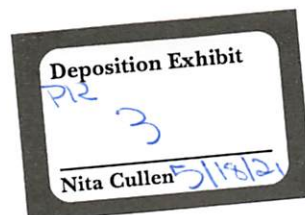
To this end, we as UNT graduate students demand the Journal of Schenkerian Studies should immediately take the following steps, and we call on the UNT College of Music and university at large to ensure these steps are taken.

1. **Publicly condemn the issue and release it freely online to the public.** Given the horrendous lack of peer review, publication of an anonymous response, and clear lack of academic rigor, this issue of the JSS should release an apology for its content and promote transparency by granting the public access to it. We believe that all contributors should be held fully accountable for their comments, which must not be hidden for the sake of the self-preservation of any involved parties. Furthermore, we must learn from these mistakes rather than attempt to erase them. By making this volume accessible to the public with a disclaimer from the CoM, we hope to enable all scholars to address this problematic "discourse."

2. **Provide a full public account of the editorial and publication process, and its failures.** Throughout the publication of this issue, significant irregularities occurred in the acceptance and solicitation processes, whether individuals with the title of editor were permitted to edit content, and how the contents of Issue 12 were approved by any responsible oversight process. JSS must make a public account of the process so individuals who intentionally subverted academic discourse can be held accountable by their respective institutions.

We also call on the University of North Texas and the UNT College of Music to take the following actions.

1. **Dissolve the JSS.** The JSS has demonstrated that it does not meet the standards of a peer-reviewed publication. The publication of this issue demonstrates that the JSS, through its subversion of academic processes, is not in fact peer reviewed and lacks rigor. The basis of academic discourse is trust and authenticity, and the JSS has violated that trust. Without accountability and responsible scholarship, there is no reason for it to exist.



2. **Critically examine the culture in UNT, the CoM, and the MHTE Division, and act to change our culture.** UNT has gained a reputation as an institution with a toxic culture when it comes to issues of race, gender, and other aspects of diversity. Although we would like to imagine that these problems are behind us, the JSS has proven that our department's culture remains toxic, and it needs to change. While we as graduate students are working to change the culture, the university must be a part of the solution. If institutional inertia impedes this change, UNT and the College of Music are a part of the problem, not the solution.

3. **Hold accountable every person responsible for the direction of the publication.** This will involve recognizing both whistleblowers and those who failed to heed them in this process. This should also extend to investigating past bigoted behaviors by faculty and, by taking this into account, the discipline and potential removal of faculty who used the JSS platform to promote racism. Specifically, the actions of Dr. Jackson—both past and present—are particularly racist and unacceptable.

We sincerely apologize to Dr. Philip Ewell for these racist attacks on his scholarship and character. We firmly support Dr. Ewell, and his call to critically examine the racial frameworks in which Schenkerian analysis and other theories were developed. We gratefully acknowledge the push for inclusion and diversity in academia, and his continued work for diversity and anti-racism in the field of music theory, which he advocated for in his 2019 SMT plenary address. In the weeks, months, and years ahead, we will strive to change the toxic culture at UNT. We recognize that this will be difficult work, and we are prepared to fight for inclusivity now and in the future.