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| Logo  Description automatically generated | **Date: February 4, 2025** |
| **Matter No.: 00075-Jackson** | **Objection to designation of Bakulina deposition transcript** |
| Prepared by | Michael Thad Allen |

# Transcript 2: Ellen Bakulina

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| --- | --- | --- | --- | --- | --- | --- |
| 207 | 7 | - | 207 | 9 |  | Testimony addresses alleged applications for a “rebranded” Journal of Schenkerian Studies on which the deponent served on a search committee. No documents were produced in discovery substantiating the witness’ claim that applications were ever received by the search committee, evaluated by the search committee, or accepted or rejected by the search committee, or the reasoning for allegedly doing so. The witness testified that substantial documentation must exist, but no such documentation was ever produced in discovery. Plaintiff therefore objects that the witness’s testimony be struck under Fed. R. Civ. P. 37.  |
| 214 | 24 | - | 217 | 21 |  | Same objection as above. |