**DEPOSITION INDEX OF PETER KOHANSKI**

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|  | Mr. Kohanski is not a party, but the State (Bhouslav) has stepped in to represent him. | 4:19-24 |
|  | Kohanski is taking Zoloft for depression. | 7:7-25 |
|  | Kohanski never posted on Instagram re this issue. | 9:20-24 |
|  | Kohanski is also represented, in a limited capacity, by the General Counsel’s office of the University of Texas; specifically, Renaldo Stowers. | 11:11-15 |
|  | Discussed collection of responsive documents with immediate family in addition to counsel. | 11:16 – 13:24 |
|  | Kohanski’s relationship to UNT, current field of study, level of study, coursework, and educational background | 14:4 – 18:1 |
|  | Exhibit 2 and Kohanski’s composition of “Dear Colleagues” correspondence. | 18:6-18:12 |
|  | Correspondence was sent to approximately 40 graduate students in the division of MHD at UNT and how their contact information was obtained for the purpose of soliciting signatures. | ­18:13-19:15 |
|  | Kohanski was sole author of correspondence. | 20:3-20:9 |
|  | Kohanski was assisted by colleagues to compile a list of recipients. They met via Zoom. | 20:10-21:4 |
|  | Kohanski was president of the graduate association of musicologists and theorists (GAMuT). Description of position, description of GAMuT. | 21:5-23:4 |
|  | Kohanski denies any DEI responsibilities with GAMuT. | 23:5-23:8 |
|  | Ex.2p.2 “Dear Dean Richmond” letter. Who composed, edited, and gave input to its contents. Specifies Dean John Richmond of the College of Music. | 23:9 – 25:2 |
|  | Was not an official GAMuT activity. | 25:3-15 |
|  | Letter written as concerned grad students and members of the division. | 25:16-25 |
|  | ¶2 of letter. Anti-black racism in reference to Jackson article in V12 of JSS. | 26:1 – 30:1 |
|  | ¶2 of letter. Platforming of ad hominem attacks in response to Dr. Philip Ewell’s scholarship. | 30:2-15 |
|  | Timeline of when Kohanski read Jackson article. | 30:16 – 31:18 |
|  | Kohanski began composing letter after he read the entire article. | 31:19-21 |
|  | Clarification of “monolithic” with regard to the black community/anti-Semitism. | 32:6-21 |
|  | ¶2, sentence 2 of letter. “Egregious acts that go beyond the bounds of academic discourse.” Re statements published in the JSS. | 32:22 – 33:6 |
|  | Materials submitted detailing editing process of journal, communications between editorial staff. | 33:7 – 34:23 |
|  | “Reprehensible aspects of the journal”; “Lack of Peer Review.” | 34:24 – 37:1 |
|  | “Illicit collaboration.” | 37:2 – 41:9 |
|  | Including music theory students in solicitation of support for letter. | 42:2 – 43:5 |
|  | “Editorial missteps”. Levi Walls involvement. | 43:6 – 44:19 |
|  | Levi Walls speaking to group over Zoom meetings held in the course of one week. | 44:20 – 46:5 |
|  | Kohanski’ s direct communication with Walls re Twitter reactions to document re statement that was reproduced as part of the ad hoc panel report. Walls concerned about what this would mean for his future. | 46:6 – 50:16 |
|  | 1-5 of Kohanski’s statement, “The following steps to be taken.” No. 2, “a public condemnation of the issue and release it fully online to the public.” | 50:17-25 |
|  | #1: “The JSS moving forward”.  “Dissolve the Journal.”` | 51:1-12 |
|  | #2: “A public condemnation of the issue and release it fully online to the public.” | 51:13 – 52:25 |
|  | #3: “A full, detailed, and public account of the editorial and publication process.” Ad hoc review panel. | 53:1 – 54:10 |
|  | #4”Hold accountable every person responsible for the direction of the publication.” | 54:11-14 |
|  | “Past bigoted behaviors by faculty.” Dr. Jackson allegedly telling an Asian student to put rocks in his mouth. | 54:15 – 58:20 |
|  | Calling for Dr. Jackson’s dismissal. “A history of racist, sexist, and abusive behavior in his many capacities.” | 58:21 – 60:1 |
|  | Specifics as to Dr. Jackson’s “history”.   1. Publication of the Volume 12 of the JSS. | 60:2-6 |
|  | 1. At CSS, using an RA (Yiyi Gao) to aid with personal research. | 60:7 – 64:3 |
|  | #3 Extortion in reference to grade manipulation. Again, in reference to Yiyi Gao. Can’t remember specifics as to how Gao’s career and reputation were threatened. | 64:3 – 65:15 |
|  | Discussion on if it is ever legitimate for a student’s career to be threatened in their work with a professor. Kohanski says no, even if they fail to perform up to the standards required by the program. | 65:16 – 66-7 |
|  | Kohanski says that there is no circumstances in grad school where a professor should fail a student, even if the student is not meeting expectations. | 66:10-22 |
|  | Kohanski has no knowledge or memory that there was actually extortion involved but signed the letter. | 67:4-16 |
|  | Was Jackson’s extortion sexist? | 67:17 – 68:14 |
|  | Kohanski has no knowledge of women and people of color beyond Yiyi Gao that Jackson has shown “a pattern of harmful behaviors that disproportionately affected marginalized students.” | 68:15 – 69:3 |
|  | Kohanski’s knowledge that Jackson’s wife is Korean and opinion on if she is marginalized and how. | 69:3 – 70: 9 |
|  | #5 “Problematic culture within the Division of MHTE.” | 70:10 – 71:8 |
|  | Asking Kohanski to describe DEI. Kohanski states it is certain faculty members, including Dr. Jackson. | 71:9 – 72:9 |
|  | Asking Kohanski is describing himself as white and straight is monolithic. Kohanski says you can use monolithic statements re people who have privilege. Doesn’t know if it applies to white, Jewish, straight men. | 72:10-20 |
|  | Ad hoc panel report of UNT. Discussion of what report is and Kohanski’s understanding of it. | 73:1-74:5 |
|  | Differences between July 29, 2020 letter and November 25, 2020 circulated letter. | 74:6 – 75:16 |
|  | Who authored the July 29, 2020 statement? | 75:20 – 76:24 |
|  | #3 “Hold accountable every person responsible for the direction of the publication.”  “Specifically, the actions of Dr. Jackson…” | 76:25 – 77: 15 |
|  | Letter “gratefully acknowledging” DEI, definitions, examples. | 77:16 – 79:19 |
|  | Professor Jackson preventing DEI in music in the division due to Schenkerian analysis being “exclusive”. | 79:20 – 80:17 |
|  | Kohanski’s understanding of Schenkerian analysis and it’s lack of inclusivity. | 80:18 – 85:15 |
|  | DEI programs in the MHTE division. | 86:16 – 87:4 |
|  | Kohankski felt faculty who could most benefit from DEI training weren’t there, including Dr. Jackson. | 87:5 – 88:10 |
|  | Kohanski’s recollection of the DEI workshops and materials, found them “underwhelming”. | 88:11 – 90:21 |
|  | Discussion re climate survey. | 90:22 – 92:2 |
|  | Discussion re DEI reading group. | 92:3 – 93:12 |
|  | List of signatures solicited for Exhibit 2. | 93:13 – 93:22 |