

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

**Timothy Jackson,**

Plaintiff,

v.

**Laura Wright, Milton B. Lee, Melisa Denis, Mary Denny, Daniel Feehan, A.K. Mago, Carlos Munguia, and G. Brint Ryan,** each in their official capacities as members of the Board of Regents for the University of North Texas System; **Rachel Gain; Ellen Bakulina; Andrew Chung; Diego Cubero; Steven Friedson; Rebecca Dowd Geoffroy-Schwinden; Benjamin Graf; Frank Heidelberger; Bernardo Illari; Justin Lavacek; Peter Mondelli; Margaret Notley; April L. Prince; Cathy Ragland; Gillian Robertson; Hendrik Schulze; Vivek Virani;** and **Brian F. Wright,** Defendants.

Case No. 4:21-cv-00033-ALM

**AFFIDAVIT OF MICHAEL THAD ALLEN**

I am an attorney admitted to this Court pro hac vice and an attorney admitted to the United States District Court of Connecticut, Massachusetts, and the Northern District of New York.

I make the following statements based on my direct experience for the purpose of authenticating the following documents:

1. Attached as **Exhibit A** is an excerpt of the Deposition of Levi Walls, former editor of the Journal of Schenkerian Studies, dated May 18, 2021.
2. Attached as Exhibit B is a true copy of UNT's policy captioned, "Academic Freedom and Academic Responsibility," guaranteeing academic freedom and freedom of

speech, which it promulgates in the public domain, available at

<https://policy.unt.edu/policy/06-035>.

3. Attached as **Exhibit C** is a true copy of UNT's policy captioned, Policy 02.1400 captioned, "Reporting Suspected Wrongdoing," which provides established processes and procedures for doing so, which UNT promulgates in the public domain, available at

[https://www.untsystem.edu/sites/default/files/documents/View\\_Chancellor/02.1400\\_reporting\\_suspected\\_wrongdoing\\_final\\_pdf\\_version.pdf](https://www.untsystem.edu/sites/default/files/documents/View_Chancellor/02.1400_reporting_suspected_wrongdoing_final_pdf_version.pdf), courtesy copy appended here as **Exhibit C**).

4. Attached as **Exhibit D** is a true copy of UNT's policy Policy 03.1001, captioned "Employee Grievances," which UNT promulgates in the public domain, available [https://www.untsystem.edu/sites/default/files/documents/View\\_Chancellor/03.1001\\_employee\\_grievances.pdf](https://www.untsystem.edu/sites/default/files/documents/View_Chancellor/03.1001_employee_grievances.pdf), Courtesy copy appended here as **Exhibit D**).

SIGNED UNDER THE PENALTIES OF PERJURY, THIS SECOND DAY OF NOVEMBER 2021.



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Michael Thad Allen, Esq.

Hereto witnesseth,



Commissioner of the  
Superior Court of Connecticut