

**Below is an outline of the situation between M. NourbeSe Philip and Rana Hamadeh concerning the unauthorised use of the former's work, *Zong!*.**

**All exhibits, a list of which appears on page 15, are linked through Google docs.**

## **The Facts**

M. NourbeSe Philip (MNP) is a former lawyer as well as a poet, writer, essayist and playwright. MNP is the author of the book *Zong!*, a book-length poem, published by Wesleyan University Press in 2008.

*Zong!* relies entirely on a two-page court report, *Gregson vs. Gilbert*, which grants a new trial to the ship's owners, the Gregsons. Founded on insurance law, the case report recounts the murder by drowning of some 130 enslaved Africans on board the eponymous slave ship *Zong* in 1781.

***Zong!*, the poem, is a formally innovative conceptual work, which uses only the words and their components of the case report *Gregson vs. Gilbert* to compose the poetry. *Gregson vs. Gilbert* is the mother document of *Zong!*— the nucleus and word store. It is the sine qua non of *Zong!* Without *Gregson vs. Gilbert* there is no *Zong!*. The case report, *Gregson vs. Gilbert*, appears on page 120 of the book, *Zong!*.**

### Exhibit # 1 — *Gregson vs. Gilbert*

Also appearing in the published work *Zong!* is a long, theoretical essay, Notanda, p. 189, that sets out the ideas and theoretical underpinnings of the poem. Among the ideas discussed are the story that cannot be told yet must be told; the untold and the untellable; fragmentation; violence; erasure; the power and ability of the law to create, destroy and exclude; the persistence and continuity of sound and, in particular, the sound of the drowned.

The poem *Zong!* is a formal expression and display of the ideas that are described in the accompanying essay, Notanda. It is fragmented, disjunctive and coded with a multitude of voices. **It is refracted through the unnamed voice of one of the perpetrators of the massacre of the enslaved on board the slave ship *Zong* and told through the voice of the Ancestors represented by Setaey Adamu Boateng whose name appears as co-author on the book.**

*Zong!*, the poem, is both rooted in and springs from the experience of enslaved Africans forcibly removed from their homelands and brought to the Americas and the Caribbean through the transatlantic slave trade, the *Maafa*.

*Zong!* is enmeshed in the idea of the archive in three ways: the legal archive of *Gregson vs. Gilbert*, the case report mentioned above; the liquid and sound archive of the Atlantic ocean and, most importantly, the genealogical and spiritual archive of the Ancestors.

During the 7-year process of composing the work MNP sought permission of the Ancestors by visiting Ghana, departure point of the slave ship *Zong*, and speaking with traditional elders and spiritual leaders. She also visited Liverpool where the Ancestors of the crew would have come from to pay respect to those people.

While *Zong!* has been critically received as an experimental, conceptual work, it is also work that is rooted deeply in the spirituality of African Ancestors, which manifests itself in the stated authorship of the work: “*Zong!* by M. NourbeSe Philip, as told to the author by Setaey Adamu Boateng.” On the cover of *Zong!* it states that “*Setaey Adamu Boateng is the voice of the ancestors revealing the submerged voices of all who were on board the Zong.*”

Indeed, authorship of the work can be said to reside not solely in MNP, but also the ancestors and the dead. In *Notanda* MNP writes: “even claiming to author the text through my own name is challenged by the way the text has shaped itself. The way it “untells” itself.”

*Zong!* fragments, reconfigures and distorts the words of the *Gregson vs. Gilbert* case report and the concepts of the compositional process are unique to the work, for example the narrative, such as it is, *being refracted through the voice of the perpetrator*.

*Zong!*, the poem, is internationally known and taught widely at universities in North America and Europe. It is extensively written about, anthologised and the subject of many Ph.D. theses.

MNP performs this work regularly and there exist online many recorded performances of this work. For the last six (6) years MNP has hosted a collective reading, international in scope, in which she and an audience read the work

together on the anniversary of the event, November 29, 1781. Indeed, *Zong!* has become one of the myriad ways that the descendants of the *Maafa* (the slave trade and slavery), African and African descended peoples, have designed to survive and manage the historical trauma of the *Maafa* and its legacies, such as racism and marginalization.

On July 25, 2017, Omar Berrada (OB) wrote to MNP informing her that he had recommended her work *Zong!* to the artist Rana Hamadeh (RH) who was a friend of his. In that email OB wrote that “reading *Zong!* (had) become for (RH) a daily ritual, and a guide in some way.”

Exhibit # 2 — OB’s letter to MNP, July 25, 2017

Attached to that email was a description of RH’s work, *The Ten Murders of Josephine*, (*TMoJ*) commissioned by Witte de With Center for Contemporary Art (WdW). It is unclear when this description was written but it makes no mention of MNP (or her work *Zong!*) among the writers mentioned and it may therefore be safe to conclude that it was written before RH began using *Zong!* as a “guide in some way.”

Exhibit # 3— Description of RH’s work

On July 31, 2017, some six (6) weeks before the opening of her show at the WdeW, RH wrote to MNP asking for “blessings and permission to mention *Zong!* and point towards it.” RH also states in that email that *Zong!* had become “***a major influence and reference; in fact a daily ritual that grew slowly throughout my working process into becoming an important theoretical and affective scaffolding within the work.***” RH proposed “*using Zong!’s typography as a logic. I am constructing part of the sound’s rhythmic/percussive structure, taking Zong!’s pages’ layout and the way the layout builds its intensity throughout the book as my reference.*” RH describes building an Organ Book Reader which would produce an ‘organ book’.

Exhibit #4 — RH’s letter to MNP, July 31, 2017

On August 1, 2017, MNP responded to RH that she was busy editing a ms and that she would respond as soon as possible.

Exhibit #5 — MNP’s first letter to RH, August 1, 2017

On a quick perusal of the letter and the link contained within it, MNP was not particularly happy with the way in which RH had used the work but because of the stress of her sister's illness was not able to analyse fully why she didn't like RH's use of her work. On September 1, 2017, MNP once again wrote to RH explaining that because of the stress of the terminal illness of her sister whom she was about to visit in the US, she was "unable to respond intellectually to (her) engagement with and queries about using *Zong!*."

Exhibit #6 — MNP's letter to RH, September 1, 2017

MNP has never received a response to that email, however on March 22, 2018, she received a letter from RH inviting her to participate in a conversation in Paris at gallery *La Fayette Anticipations*. (See Ex.16 below)

On or about January 27, 2018, MNP became aware that RH had used *Zong!* in her work (*TMoJ*) when a colleague who had no knowledge of the previous email exchange between RH and MNP informed her that she had seen the exhibit in the Fall of 2017 in Rotterdam. The notes attached as Exhibit #7 below recount the writer's thoughts and responses on seeing the exhibit since at that time she was contemplating writing an article about the show. In particular, the second and fourth paragraphs:

*The Rome prize winner RH...recently tool (sic) up and engaged with the ideas and creative poetry work of...M. NourbeSe Philip, particularly her poem Zong! Amongst others Hamadeh focuses particularly on the Gilbert and X case and it's (sic) significance. She looks to M. NourbeSe Philip's long (experiential (sic)poem Zong! And its methodology and cues as PHONIC SUBSTANCE.*

Exhibit #7 — Yaniya's notes (Please note that these are very preliminary notes made in anticipation of an article.)

There appear to be three exhibitions/installations under the name the *Ten Murders of Josephine*: the WdW exhibit; a theatrical work/opera presented at Theatre Rotterdam; as well as a work made for the Prix de Rome with the subtitle (*The Tongue Twister*).

The work made for the Prix de Rome, *The Ten Murders of Josephine (The Tongue Twister)*, presented at Kunsthall in Rotterdam was awarded the Prix de Rome with a cash prize of 40,000 euros.

Exhibit # 8 — News report on RH winning the Prix de Rome;  
<http://artradarjournal.com/2018/01/09/lebanese-artist-rana-hamadeh-wins-prix-de-rome-visual-arts-2017/>

*TMoJ* ran from September 8, 2018 - December 31, 2018, at the WdeW in Rotterdam.

The Exhibition Guide for *TMoJ* contains one reference to M. NourbeSe Philip and her work, *Zong!*:

*Drawing broadly on historian Saidiya Hartman and poets NourbeSe Philip and Fred Moten's writings, Spike Lee's Bamboozled, Kafka's Josephine, Quranic exegesis and Arabic prosody, among other interlocutors, the project suggests the testimonial as a catalyst that sets up the conditions for vacating our legally constituted bodies; a medium for provincializing citizenship.*

Exhibit #9 — [www.wdw.nl/files/WdW\\_2017\\_Exhibition%20Guide%2003\\_EN\\_DEF-spreads.pdf](http://www.wdw.nl/files/WdW_2017_Exhibition%20Guide%2003_EN_DEF-spreads.pdf)

Exhibit #9(a) Excerpt from Exhibition Guide pertaining to *TMoJ*

The following paragraph also appears in the Exhibition Guide with no reference to the source, MNP's *Zong!*.

*One of Hamadeh's cues is the Gregson vs. Gilbert legal case of 1783, the only surviving record of the massacre in which the captain of the Zong slave ship ordered the drowning of 133 enslaved Africans in order to claim insurance over the ship's loss of 'cargo'. During the case, the owners of the Zong came up against their insurers, disputing whether or not the drowning of the slaves was a 'genuine act of jettison or a fraud'. For Hamadeh, this benchmark case does not only point to the blood-chilling jurisprudential logic of the slavery system, but, further, continues to inform and underpin our current legal understanding of 'valid speech'; for, the only audible testimony that can be accessed through the document is that which is written in the murderer's voice and in the voice of the legal system that had legitimated the murder. The materiality of the testimonial, thus, for Hamadeh, points to the archive of horror that subsists within the documental voice – not as a trace of the massacre, but within and despite the trace. How does Josephine, who is loosely based on Kafka's mouse songstress, then fit into an engagement with historical cases such as the Gregson vs. Gilbert and the Zong massacre?*

## Comments

• There is no mention of the source of her information on the Zong massacre. There is no mention of *Zong!* that became the “*theoretical and affective scaffolding*” within her work and whose form was her “reference.”

Exhibit #10 — Program: [http://www.wdw.nl/en/our\\_program/exhibitions/rana\\_hamadeh\\_the\\_ten\\_murders\\_of\\_josephine](http://www.wdw.nl/en/our_program/exhibitions/rana_hamadeh_the_ten_murders_of_josephine)

Exhibit #11 — light box map, part of RH’s exhibit in which Zong! is described as “phonic substance”.

Exhibit #12 - Gregson vs. Gilbert, part of RH’s exhibit

Exhibit #13 — recording related to Gregson vs. Gilbert from TMOJ exhibit with Gregson vs. Gilbert

On March 22, 2018, Wesleyan University Press (WUP) wrote to WdW stating their concerns — that RH’s use and appropriation of *Zong!* was “*unprofessional, unethical and even academically dishonest*” and constituted “*an adaptation of Zong!*”... “*made without the permission of the author.*” This letter was copied to RH as well as the office of the Prix de Rome Jury.

WUP’s letter raised the following issues:

- did the gallery ask to see permissions and “*if there were no permissions, why did (the gallery) go ahead?*”
- were pages of *Zong!* used in the installation as described by RH in her July 31, 2018 letter. (Exhibit #3 above);
- that the WdW provide a written apology to MNP and place said apology on the WdW website and in all instances where the project appears with the credit line: *This work was inspired by the book Zong! by M. NourbeSe Philip. The book was a major influence and reference, forming an important theoretical and affective scaffolding within the work. Zong! by M. NourbeSe Philip, as told to the author by Setaey Adamu Boateng, was published in 2011 by Wesleyan University Press, Middletown, CT, US; copyright is held by M. NourbeSe Philip.*
- that copies of the project’s libretto and book be mailed to the Press;
- that until all of the above actions have been taken, WdW should not exhibit the work again and that it be removed from the website ([http://www.wdw.nl/en/our\\_program/exhibitions/rana\\_hamadeh\\_the\\_ten\\_murders\\_of\\_josephine](http://www.wdw.nl/en/our_program/exhibitions/rana_hamadeh_the_ten_murders_of_josephine));
- that there be a discussion on a reasonable fee for use of the material.

Exhibit #14 — WUP letter to WdW, March 22, 2018

## Comments

•MNP and WUP are unaware as to whether the individual Jury members have actually received copies of the letter, since there has been no acknowledgement of receipt of the above letter from the Jury of the *Prix de Rome*.

•On March 22, 2018, Sofia Hernandez Chong Cuy, current director of WdW, replied on behalf of the gallery by email and informed WUP that the curator of the show that RH has participated in was no longer at the WdW and that she would look into the matter.

### Exhibit #15 — WdW letter to WUP, March 22, 2018

On March 22, 2018, almost simultaneous with WUP's letter to WdW, RH wrote to MNP inviting her to participate in an event at *La Fayette Anticipations*, a gallery in Paris. This was the first communication by RH with MNP since her July 31, 2017 request for "blessings and permission."

In this letter RH invites MNP to "resume conversation." There has never been a conversation between RH and MNP beyond the query for "blessings and permission" and MNP's response, so there was no conversation to resume.

### Exhibit #16 — RH's letter to MNP, March 22, 2018

On March 29, 2018, Sofia Hernandez Chong Cuy responded more fully informing Suzanna Tamminen that:

— they had spoken with the curator of the installation, (*TMoJ*), Defne Ayas, and with "several team members of WdW who were involved in the production of *Hamadeh's project*";

— she had "***met several times with RH who lives in Rotterdam***";

— WdW had invited RH to participate in its program in 2016;

— "*preceding the installation and opera was a study group conceptualized by RH and held at WdW from November 3, 2016 to June 29, 2017*";

— in Summer 2017, WdW advised RH to request permission from for using "*the typography of Zong! to create a musical score for the components of the Ten Murders of Josephine (TMoJ)*";

MNP  
one of

— this request came five (5) weeks before the opening of RH’s show, on July 31, 2018; in it RH requested from MNP “*blessings and permission to mention Zong! and to point to it*”;

— by September 2, 2017, RH “*reconsidered her initial idea and did not materialize her artwork as it was initially proposed or described to MNP*”;

— RH did not include pages of *Zong!* in the installation;

— WdW was willing to comply with the request for a credit line but with “slight edits” as follow:

*The Ten Murders of Josephine by Rana Hamadeh was inspired and informed by several historical, literary and cinematic works. Among these is the book Zong! by M. NourbeSe Philip, which according to Rana Hamadeh “helped form an “important theoretical and affective scaffolding within the work. Zong! by M. NourbeSe Philip, as told to the author by Setaey Adamu Boateng, was published in 2011 by Wesleyan University Press, Middletown, CT, US;copyright is held by M. NourbeSe Philip.*

Exhibit #17 — WdW letter to WUP, March 29, 2018

**Comments**

- The suggested change is unacceptable and more than a slight edit.
- Given that RH used the pages of *Zong!*’s layout and “*the way the layout built its intensity throughout the book as (her) reference,*” what were the changes she made so that she did “*not materialize her artwork as it was initially proposed or described to MNP in the short time before the opening of her show?*”
- WdW has not responded to WUP’s request for an apology or stated whether they are willing to pay a fee for use of the work.
- Why did RH ask for “blessings”?
- Why wasn’t there a query about permission fees?
- What is WdW’s responsibility re permission fees and why did they only suggest she ask for permission 5 weeks before the opening of the exhibit?
- WdW at not time states that RH believed she had permission although they met with her “several times.”
- Although the gallery states that RH did not use pages of *Zong!* in her exhibit, we do not know whether pages of *Zong!* were, in fact, used in the installation, since RH publicly states at her February 25, 2018, lecture at Sonic Arts Academy in Amsterdam that she did use them. She explains this by saying that she believed she “*had (my) blessing anyway.*”

On March 29, 2018, RH wrote to MNP stating that she would be sending MNP a letter “*with further explanation*” and that she did not intend to “*erase (MNP) or (her) important work.*”

Exhibit #18 — RH’s letter to MNP, March 29, 2018

On April 6, 2018, RH once again wrote to MNP: she apologises for “upsetting” MNP; she also attempts to “*clarify that (she) did not use the poetry and intellectual work from the book Zong!*” in *TMoJ*. She writes that “**Zong! is a very dear bibliographical reference - among many others.**”

**Comments**

• Cf. RH’s July 31, 2017, letter to MNP that *Zong!* had become a “**major influence and reference...that grew slowly throughout my working process into becoming an important theoretical and affective scaffolding within the work.**”

Among RH’s explanations are the following:

— she changed the work *TMoJ* in and around September, 2017, because she realized she was asking for permission too late;

—she thought that she had MNP’s permission. This contradicts what WdW states in their March 29, 2018, letter to WUP. They write that they had several conversations with RH; the letter makes no mention of RH believing that she had permission. Indeed, based on their conversations with her, they state that she changed the work because she realized that there wasn’t enough time;

— she believes that when she mentions *Gregson vs. Gilbert*, she has to mention *Zong!*;

—although she claimed she changed the organ book, she misled the audience at a talk at the Sonic Acts Academy in Amsterdam on February 25, 2018, in which she talked of *Zong!* and the organ book, which she had earlier claimed was not a part of the WdW exhibition: “*Since I thought I had your blessing anyways, I didn’t think it was a problem to explain things in that manner.*”

RH’s letter states in the paragraph subtitled *Prix de Rome* that there was mention of *Gregson vs. Gilbert* in this exhibit with “*spots blacked out on these three pages in the way I had suggested in my original email to you.*” In the same letter she writes that she “*credits me in the first lines of (her) text that directly follows...*”

Neither MNP or WUP has seen this document and neither knows to what extent *Zong!* was used in the *Prix de Rome* installation.

The April 6, 2018, letter is dense and often overwhelms with detail. Attached as Exhibit #20 is the same letter as appears in Exhibit # 19 with highlights and MNP's responses to the points made in the margins.

Exhibit #19 — RH's letter to MNP, April 6, 2018

Exhibit #20 — RH's letter to MNP with notes

### Comments

- It is noteworthy that RH has never thanked MNP for granting her permission if, as she now claims, she believed that she had permission.
- RH uses language such as “point to,” or “refer to” regarding her use of *Zong!* in an effort to downplay her unauthorised use of the book. This language contradicts her statement made in her July 31, 2017, letter.

In her April 6, 2018, letter RH states that she “*kept referring to Zong! as a source of inspiration, because (she) still felt that it was too important a project to ignore in the context of speaking of Gregson and Gilbert case. I say this to make clear that my reference to your work has always been intended as the exact opposite of erasure.*” In the articles that follow, one of which is an interview there is no mention of *Zong!* by MNP, the “*source of inspiration,*” in the discussions of *Gregson vs. Gilbert*.

Exhibit #21— <http://moussemagazine.it/rana-hamadeh-carolina-rito-2017/>

Exhibit #22 — [Frieze magazine](#)

The following are RH's words in an interview with interviewer Carolina Rito and published in *Mousse* magazine above. These are also the words that appear in the Exhibition Guide mentioned in Exhibit #9 above.

*One of my main cues is the foundational Gregson vs. Gilbert insurance case of 1783: the only surviving record of the massacre in which the captain of the Zong slave ship ordered the drowning of 150 African slaves in order to claim insurance over the ship's loss of “cargo.” During the case, the owners of the Zong ship came up against their insurers, who disputed whether or not the murder was a genuine act of jettison or a fraud. For me, this benchmark case does not only point to the horrific jurisprudential logic of the slavery system, but, even further, continues to inform and underpin our current legal understandings of valid speech. The only*

*audible, and thereby valid, testimony that can be accessed through the document is that which is written in the murderer's voice and in the voice of the legal system that had legitimated the murder.*

### **Comments**

- RH has carried out a fundamental assault on *Zong!* by severing *Gregson vs. Gilbert* from *Zong!* for her own use, then making unsubstantiated claims about her generosity in mentioning *Zong!*.
- Is this a breach of MNP's moral rights as author?

RH's letter of April 6, 2018, describes a lecture she gave on February 25, 2018, at the Sonic Arts Academy (SAA) in which she "*showed at an image of (her) organ book and said that the perforations were made where the words of Zong! were placed — which is in reality not the case.*" (MNP's emphasis) In other words, RH has been less than honest with her audience at least.

The attached exhibit is a FB page describing the event posted by the Journal of Sonic Studies.

Exhibit #23 — FB Post Sonic Studies

### **Comments**

- According to RH she was being less than honest with the audience at the SAA.
- Which of the various versions of the content of her show is accurate?
- Did she, in fact, change her show at WdW which opened on September 8, 2017.

On April 27, 2018, MNP received an email from *La Fayette Anticipations*, a gallery in Paris inviting her to a public discussion with RH. MNP has not replied to this or any other correspondence from RH.

Exhibit #24— Letter from La Fayette Anticipations

Exhibit #25— Professor Katherine McKittrick's (Ph.D., Queen's University)

response

Exhibit #26— Independent scholar Kate Siklosi's (Ph.D.) response

## Note from MNP

I don't know much about copyright law and haven't practised law for several years, but as a former lawyer am comfortable with the legal language and have done some cursory research online. Below are some of the issues, legal and otherwise, that have occurred to me, which I assume are no means exhaustive.

### Legal issues

Copyright infringement for unauthorised use of *Zong!*?

Colourable imitation?

Breach of moral rights?

Tort of misrepresentation?

### Moral Rights

Would what has happened constitute a breach of MNP's moral rights as author of *Zong!* given that *Gregson vs. Gilbert* is the foundation of the work and provides the word store for the poem *Zong!*? The poem is composed by using the words of the case.

RH severs *Gregson vs. Gilbert* from *Zong!* where it functions as the mother document, the *sine qua non* of the poem; she then uses the document in her work in a similar way that MNP uses it in *Zong!*; she then talks of *Gregson vs. Gilbert* as if it were a stand alone document and then carries out a sleight of hand in which she says she has to mention *Zong!* because she feels "it was too important a project to ignore." But at the heart of "the project" as she calls it, is *Gregson vs. Gilbert*, which provides the word store for the poem.

Had RH used *Gregson vs. Gilbert* in another context it would be difficult to argue with her use of what is essentially a public document, but she not only appropriates the case and talks of it as if of her own accord she found it, she appropriates the way it is used in *Zong!*, and she appropriates the form of the poem when she states she her work builds in intensity like the way *Zong!* does.

While *Gregson vs. Gilbert* exists as a legal text in the legal archive, it was MNP's work and creative reimagining that has made it a cultural artifact and document. No one in the literary and artistic world would know of *Zong!* at all let alone as a cultural document were it not for *Zong!* By RH using *Gregson vs. Gilbert* in the

same way MNP used it she has committed an egregious breach of copyright. By erasing the source of her use of the work is a further injury to MNP.

*Zong!* is not a project — except for RH. *Zong!* is a way of mourning — a lament for the traumas of history, particularly for African descended people. To serve her own ends RH has re-traumatized those drowned beings; indeed, she has murdered them all over again in her attempt to use their lives and deaths to prove her point about the “testimonial subject.”

In her own words RH talks of *Zong!* being an “affective and theoretical scaffolding,” while simultaneously downplaying the role of the work to being one among many sources. A “dear bibliographical reference” is how she refers to the “affective and theoretical scaffolding” of her installation. I have a profound concern with RH construing *Zong!* as a scaffolding. If, however, we stay within her unfortunate metaphor, a scaffolding is a structure that is essential to the creation of another structure, which is inconsistent with the “dear bibliographical reference.” In her own words RH writes that she took “*Zong!’s pages layout and the way the layout builds its intensity throughout the book as (her) reference.*” She is attempting to have it all ways when she simultaneously denies its role in her work. *Zong!*, it can be argued, became the *sine qua non* of significant aspects of *TMoJ*, if not the whole installation, including the Prix de Rome exhibit.

### **Other issues and questions**

Permission fees;

Only seeking permission 5 weeks before show opens;

Asking for “blessings” rather than querying re payment;

Role of the galleries;

WdW had been working with her for over a year — did they do due diligence re permissions?;

Who funds them? Should their funders be notified?

When she said the show was changed what do they and she mean by that given that in her July 31, 2018 letter she talks about using as her reference the *layout of Zong! and the way the layout builds its intensity throughout the book?*;

What is the gallery’s responsibility?;

We need to see the material she used for the Prix de Rome exhibit given that she states that she did use *Gregson vs. Gilbert* in that exhibit;

The contradictions — she states she believed she had my permission, yet she states she realized she was asking too late for permission so she changed her show.

Which of these is correct?;

If she thought she had my permission why has she never thanked me for that permission, and why did she need to change the show?; She states she believes she has to mention *Zong!* when she talks about *Gregson vs. Gilbert*, yet this does not happen in at least two cited articles.

### **Pending**

—Copies of the libretto and the book were sent as attachments in the March 29, 2018, letter from WdW to WUP but there was no indication that there was a time limit to accessing them. They are no longer accessible. They should be made accessible once again.

— *Prix de Rome* booklet that refers to *Gregson vs Gilbert* must be sent and a description of how *Gregson vs. Gilbert* was used.

— WdW is willing to make a correction to the accreditation notice but their “slight edits” are unacceptable.

— RH has offered to destroy the organ book. She must.

### **Remedies**

?

- Retroactive payment for unauthorised use of the work in exhibits.
- Apology.
- Amendment of the website to acknowledge use of MNP’s work.
- Destruction of the organ book as suggested by RH.
- Further info needed on *Prix de Rome* installation before knowing how to proceed.
- Non-legal strategies.

## List of Exhibits

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- #2 — OB's letter to MNP, July, 25, 2017
- #3 — Description of RH's work attached to OB's letter of July 25, 2017
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- #23 — FB post, *Journal of Sonic Studies* post
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