



FORUM: *BIG MOUTH*: SEXUAL VIOLENCE, EVIDENCE
AND AMBIGUITY

The tone of justice

Voicing the perpetrator-as-victim in sexual assault cases

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Social and legal disputes around sexual violence commonly involve a pattern in which those alleged to have committed violence instead portray themselves as victims, often successfully so. As part of the Forum on evidence and ambiguity in the *Big Mouth* film project, this article explores the process of legal and everyday persuasion involved in reinforcing this narrative of victimhood. In the events in *Big Mouth*, the survivor and her advocates film, broadcast, argue, and plead to convince others of the harm done to her, while the perpetrator repeatedly claims his own injury, including through a retaliatory lawsuit against the journalist Moussa Yéro Bah. Focusing on the perpetrator's assertion of his own victimhood, I consider how such claims are voiced and how they interact with existing ways of listening, to perpetrators and to survivors. I draw attention to sound and listening to examine the performance of claims and the strategies by which parties in a dispute are rendered varyingly audible or inaudible to the law and the public at large.

Keywords: defamation, sexual violence, film, evidence, law, voice, Guinea

Big Mouth explores conflicting narratives and competing demands for justice—for survivors of sexual violence, journalists, women, activists, institutional authorities, and the accused. The aim of the film is not simply to uncover the truth of what happened in the three cases leading to Moussa Yéro Bah's conviction for defamation—an inquiry into the facts of exactly what occurred, when, where, how, and to whom. Rather, we delve into the noisy conflicts and strategies as individuals and groups jostle to make themselves heard over others, in these cases and in the law more generally. What is at stake here is not a determination of which account or claim is most truthful, but of which is most legally and culturally persuasive, and why.

Who controls the stories that ultimately sway the courts? As noted in the Introduction to this Forum, examining claims-making as a process reveals how legal narratives are constructed, ambiguous, varyingly interpreted, and how they compete for judicial and public sanction. The law is neither objective nor neutral, but rather is shaped by established and evolving knowledge

frameworks and hierarchies of power and authority. Evidence cannot resolve all ambiguity, and outcomes in any given case rest on competing interpretations of the events in dispute (Brooks 2018). Thus, trials are “venues in which the available narratives compete for ascendancy” (Schmeiser 2006: 190). Moreover, these narratives resonate beyond the courtroom and gain their potency from everyday understandings. As Kamari Clarke (2019) notes, the law resides within larger emotional regimes that shape the modes and materialization of justice. It is both shaped by and reinforces powerful social narratives regarding a priori presumptions of innocence or guilt: who is to be believed and who is not, who deserves sympathy and who does not. Those who make claims wrestle and compete to make these existing narratives work for them.

This article considers the process of legal and everyday persuasion involved in reinforcing one particular narrative: the narrative of victimhood. Social and legal disputes around sexual violence often involve a common pattern in which those alleged to have committed violence instead portray themselves as victims, often





successfully so. In the events in *Big Mouth*, the survivor and her advocates film, broadcast, argue, and plead to convince others of the harm done to her, while the perpetrator repeatedly claims his own injury, including through a retaliatory lawsuit against the journalist Moussa Yéro Bah. Focusing on the perpetrator's assertion of his own victimhood, I consider here how such claims are voiced and how they interact with existing ways of listening, to perpetrators and to survivors. My analysis draws attention to sound and listening to examine the performance of claims, the strategies by which parties in a dispute are rendered varyingly audible or inaudible to the law and the public at large.

Justice sets the tone

Of the three legal actions at issue here, the only one that went to trial was the defamation suit against Moussa Yéro Bah. Her lawyers argued that she was being unfairly targeted for her work as a journalist, but their position did not prevail. Shortly after the verdict was rendered against her, in January 2019, the opposing counsel—the perpetrator's lawyer—commented publicly on his argument on behalf of his client.¹

In a video of the statement, the lawyer speaks to journalists in the echoing, concrete-floored vestibule of the courthouse. Sounds of conversation and traffic from the road just outside permeate the space, with his speech punctuated by car horns and the ambient chatter of other voices. The lawyer, dressed in a formal robe and collar, speaks in a steady, even cadence. He pauses between phrases, adding emphasis through slight upward inflections and accent on certain phrases. Along with his attire and the distinctly male timbre of his voice, this careful, deliberate cadence creates the sense of authoritative and dispassionate pronouncement.

The lawyer's statement—in my translation here from the original French—begins by relaying the information about the judgment in favor of his client. His first words declare that “*Unfortunately*, the court has decided to hold Moussa Yéro Bah within the bonds of guilt.” He then specifies that Bah has been required to pay twenty-five million GNF in damages to his client and an additional one million GNF in court fees (about US\$3000 at the time of writing).

1. I have written elsewhere about Moussa Yéro Bah's radio clip and of activists' noisy response to the decision against her (Dave 2022b).

Despite this favorable verdict, the lawyer raises the possibility of an appeal, saying that he and his client will now assess whether they want to push for further damages. They are keeping their claim alive. But, the lawyer adds, for the time being he is “half satisfied”:

The *defamation campaign* . . . directed by Madame Moussa Yéro Bah, against my client and his family, has just been *sanctioned* . . . We hope that this decision can relieve the suffering of my client and his family, whose honor and consideration were thrown to the floor.

Having commented on these past injuries, the lawyer then pivots further ahead:

I must say that, beyond Moussa Yéro Bah, this decision must challenge *everyone*—journalist or not. From now on, you *must resist making remarks*, proffering allegations, or imputing facts on citizens without having any *proof*. Today, justice set the tone.

Slightly raising his volume and adding longer pauses between phrases, he ends by declaring that

Any person who will allow themselves to do as Moussa Yéro did to [my client] will find themselves here to be judged according to the law.

His subtle shift in vocal intensity emphasizes this last point, after which he lowers his inflection with a quiet “Thank you” to signal the end of the statement.

What is being said here, directly and indirectly? And how does “justice set the tone”?

In English-language contexts, it is commonly said in such settings that “justice has spoken.” But the French phrase *la justice a donné le ton* inflects a slightly different sense, emphasizing not only the finality of the decision rendered but also its impact beyond the courtroom. This sense draws attention to listening as well as speaking, highlighting that law always exists within a social context. A verdict is pronounced, and from that, the law sets a broader, more encompassing tone. We can understand this tone of justice as its “steady sound” (Drabkin 2001)—the taken-for-granted, the white noise and hum of machinery against which all foreground noise and action nonetheless play out and are heard. Various people speak, broadcast their voices, make their case before the judge and the public. But justice sets the tone by deciding what counts as evidence



and what does not, who is credible and who is not, who should be listened to and who should not.

Through his carefully calibrated speech and vocal delivery, the lawyer here performs the voice of the court—male, formal, unemotional, seemingly neutral. He emphasizes his own objectivity and submission to the rule of law, prefacing his statement with an expression of regret: that “unfortunately” Moussa Yéro Bah has been found guilty. This construction suggests rhetorical distance from the judgment, as if he speaks as an uninterested observer rather than as the plaintiff’s counsel. He also stresses a lack of evidence as the determinative factor in this case, asserting that the defendant acted “without having any proof.” This point further suggests the rational, objective nature of his statement, in which he is simply relaying a truth about the proceedings and the underlying events.

The voice of the court speaks, while also setting the larger ambient tone. The lawyer thus translates the verdict from a decision about one individual case to a much larger conviction about speech and its limits in public life. Even though his client has just prevailed in a contentious civil suit, he continues to argue, even expand, his case, to put “everyone—journalist or not” on notice. His statement ends with a direct caution, a threat of future action. The lawyer extends his client’s claim onwards, as a continuing and open-ended process against past injury. His client has won, yet the lawyer suggests that the claim has not been satisfied. At this point, he is outside of the courtroom, having stepped beyond its threshold to speak to the press and the listening public at large. The sounds of traffic and conversation underline the porosity of the court—not a hermetically sealed-off space but rather one that exists within a larger social setting. The claim becomes everyday and ongoing, part of a broader social conflict between journalists or others who would speak openly as they do, and those citizens like his client, who must protect their “honor and consideration.”

By using these words, the lawyer references the legal definition of defamation in Guinea, as well as conventional understandings of gender, responsibility, and public shame. He makes multiple references to his client’s family, emphasizing his role as a caregiver, husband, and father whose family presumably looks up to him and depends on him. His references to honor, consideration, and family allude to the dangers of public shaming and to a common anxiety in Guinea, and elsewhere, that journalists are predatory. According to this view, journalists fail to respect social norms around qui-

etness and discretion, in their quest to report, broadcast, and reveal (Dave 2019: 136–37).

Mobilizing this social narrative also gives cover to the lawyer’s own strategic silence on the substance of the underlying legal case. He stresses that his client was defamed “without any proof,” when in fact the proof most relevant to the defamation suit was intentionally silenced. As noted in our Introduction in this Forum, Bah never identified the perpetrator in her radio segment.² She deliberately kept certain facts unsaid. Yet the recording of her segment—which renders the defamation charge baseless—was never admitted or given a hearing in court.

Who gets to be the victim?

Beyond the absence of the defamatory statement itself, what is notably left unsaid and unmentioned here are the allegations of sexual assault, as well as any mention of the survivor herself. Sexual violence and the violation of one young woman are at the center of subsequent events that comprise this series of claims, yet they both remain greatly muted. As Bremen Donovan notes in her article, the survivor is quite literally inaudible in the video clip that she made to document the assaults by her uncle. We hear the sounds of her shifting bottles to conceal the camera, but we never hear her voice. This is likely by design. What presumably matters to her here is not to speak but to document her uncle’s actions visually, to render them apparent and obvious. She wanted the video to speak for itself, implicitly acknowledging that her voice alone would not suffice.³

2. Under Guinean law a statement does not need to explicitly name someone to be found defamatory, but it must be shown to identify them sufficiently so as to impute their “honor and consideration” (Article 108, Free Press Act; and Article 371, Guinean Criminal Code).

3. In tort law in Britain and the United States, the doctrine of *res ipsa loquitur* holds that in some cases, negligence may be so obviously construed by fact of an accident or injury that, as the Latin says, “the thing speaks for itself.” The plaintiff’s burden has been met by virtue of the incident itself. As Clarke and Kendall note in a recent article (2020), this notion of a thing speaking for itself is also often applied to certain forms of tech-heavy evidence. As they argue, however, evidence—no matter how technologically sophisticated—is always mediated and interpreted.



As Carrie Rentschler writes in this Forum, survivors are often, if not always, assumed to lack credibility. In this context, the survivor pursues multiple other strategies to assert her injury and make her claim: noisily and collectively, by bringing a group of friends to the house to challenge and threaten her uncle and his family, but also in a quite literally contained voice, when she files a complaint against him at the police station after she is arrested, and when she is later interviewed by journalists and human rights lawyers who visit her in detention. We—as observers, as the public—never hear these claims, but we do know their outcomes. Her claims are heard by some and are inaudible to others. Her complaint against her uncle is never formally pursued nor is she called to testify in his defamation suit against the journalist Moussa Yéro Bah. Her uncle—the perpetrator—and his family do hear her threats, and they retaliate with stronger ones of their own. The journalists and activists—most prominently, Bah—amplify her claim to a larger listening public, through broadcast media and subsequent protests, and they are sanctioned for doing so.

The perpetrator's lawyer, in his statement, largely disregards her. While her complaints, both formal and informal, have also challenged the honor and consideration of his client, she plays a trickier role in the story he is depicting. She is his client's niece, a young woman, at the time of the accusation a university student who was pregnant and incarcerated. Her role in this story defies easy characterization, so the lawyer expeditiously erases her from it.

This strategic silence, alongside the carefully chosen words and vocal delivery, enable the lawyer to evoke a powerful narrative that is often mobilized in such cases—a contest over victimhood in which perpetrators of sexual violence retaliate by claiming their own injury.⁴ Such claims follow common scripts about fairness and retribution in gender relations, scripts that are greatly conditioned by larger ideas of power and authority. They also follow a well-established strategy used to defend those accused of sexual assault: DARVO (Deny, Attack, Reverse Victim and Offender) (Freyd 1997: 29). Powerful, wealthy, well-connected men reverse claims of victimhood by emphasizing their own status

4. It should be noted that this public narrative tends to be mobilized by white, well-resourced men. As Kristin Bumiller (2008) notes, Black or brown men are frequently assumed to be predators and perpetrators, making this narrative of victimhood much less available.

as the injured party. They do so by evoking familiar tropes about their social and familial burdens and their unfair treatment at the hands of predatory journalists and women. These claims speak to a public ear that is conditioned to hear such men sympathetically: as authoritative, truthful, sincere, perhaps at times roguish, but deservedly so.⁵

Innumerable recent examples document the arms race of he said/she said claims when a survivor's account is aggressively met with a perpetrator's public rebuttal. Around the same time as the case against Moussa Yéro Bah, for instance, a Swedish court found the writer Cissi Wallin guilty of defamation for having claimed that the journalist Fredrik Virtanen raped her. While Virtanen was never charged, he successfully sued Wallin for gross libel (Nordberg 2022). More recently, a former minister in India, M. J. Akbar, sued the journalist Priya Ramani for defamation after she accused him of sexual harassment. Ramani was acquitted, but Akbar has appealed the decision.⁶

The events in *Big Mouth* involve a similar series of calculated escalations. Faced with rape accusations, the perpetrator first accused his niece—the survivor—of robbery, leading to her arrest and incarceration. After the ensuing publicity around the case, as well as his own arrest and brief detention, he then filed a retaliatory lawsuit against the journalist, Bah. Legal scholars note that, in the context of sexual violence, decisions in retaliatory defamation cases often favor the plaintiff (Ligon 2022). And regardless of the legal outcome, the public narrative rarely champions the survivor.⁷ As the examples

5. In France, for example, a well-documented backlash against the #MeToo movement justified and romanticized sexual harassment and assault as “flirting” and “gallantry.” “Nous défendons une liberté d’importuner, indispensable à la liberté sexuelle,” *Le Monde*, January 13, 2018, https://www.lemonde.fr/idees/article/2018/01/09/nous-defendons-une-liberte-d-importuner-indispensable-a-la-liberte-sexuelle_5239134_3232.html. Accessed June 14, 2022.

6. “Defamation case: Delhi HC admits MJ Akbar’s appeal over Priya Ramani’s acquittal,” *Indian Express*, January 14, 2022, <https://indianexpress.com/article/cities/delhi/defamation-case-delhi-high-court-admits-mj-akbars-appeal-over-priya-ramanis-acquittal-7722171/>. Accessed June 14, 2022.

7. Social media often plays an outsize role. In the defamation and counter-defamation series of actions between



here show, these scenarios are strikingly prevalent across geographic and cultural contexts. The contours of specific cases may vary, but the public debates they trigger follow familiar lines: the harmful actions of scorned or vengeful women against an unfairly accused man (see Sanday 1996). The accused, the perpetrator, becomes the injured party, in a pattern not just of victim-blaming but victim-claiming, further demonizing the survivor and hardening public opinion against her. As a commentator writes on the recent defamation trial involving the actors Amber Heard and Johnny Depp, “If you [as a survivor of sexual violence] talk back or fight back, then you are the real abuser” (Winter 2022).⁸

The question of victimhood is contentious on many levels in sexual assault cases. For one, while legal discourse commonly uses the term “victim,” survivors and their advocates often stress “survival” as a less shameful, and more future-oriented term that enables a person to live and be defined beyond their assault.⁹ Previous generations of campaigners and advocates, however, used the notion of the “victim” precisely because it drew attention to passivity, thereby eliciting sympathy for women who were considered to have been helpless and done nothing wrong (Dunn 2005: 3). This construction of the “good victim” still retains enormous clout in rape cases, as scholarly accounts and everyday examples show. The complainant must be chaste, demure, modestly dressed, morally upright, and preferably white and straight, if she is to have any chance of a favorable outcome (Anderson 2005; Boyle and Rogers 2020; Crenshaw 1991).¹⁰ Racist, classist, and heteronormative assumptions in legal and public discourse tightly regulate the parameters of victimhood for survivors, with ambiguity or deviance from the norm effectively discrediting them.

the actors Johnny Depp and Amber Heard, for example, Depp’s fans launched an online petition, which gathered millions of signatures, to derail Heard’s acting career. See Stolworth 2022.

8. For further analysis on the role of voice and listening in the Depp v. Heard case, see Dave 2022a.
9. Jennifer Dunn notes that the “survivor” label does not easily fit in contexts of domestic violence and ongoing assaults, however, as it suggests that the violence has occurred in the past (2005: 4).
10. Boyle and Rogers note that male survivors of sexual violence are also excluded from these social scripts of the good victim, particularly so for Black or gay men (2020: 326).

When a perpetrator claims victimhood, on the other hand, he and his advocates may also deliberately evoke a sense of helplessness or vulnerability. The lawyer’s statement in the present case emphasizes Moussa Yéro Bah’s agency in contrast to his client’s passivity. Bah directed a “defamation campaign” against him, not simply one broadcast segment, and as a result, his client and his family suffered, their honor was thrown to the floor. In this context, victimhood is a more effective discursive tool than survival. While survival denotes strength and empowerment, the perpetrator-as-victim downplays strength to appeal to public emotion. Thus, sympathetic commentators and observers may frame perpetrators as the “real victim” in a given case, but rarely as the “real survivor.”¹¹

Why are the grievances of the powerful so readily adopted and accepted by others? As the example of the lawyer’s statement shows, social narratives work by telling us what we already know about the world, reinforcing ideas that we have been raised with. Affect, sound, and voice are critical to this strategy. In the complicated scenario described here, the lawyer uses voice to evoke multiple meanings and feelings: sympathy for his client, anger at Moussa Yéro Bah, regret yet rationality on the decision itself, silence in reference to the survivor. As David Toop notes (2010: 25), sound has power because of its ambiguity: it is both “elusive in [its] meaning and persuasive.” The lawyer uses this ambiguous, spacious capacity of sound and voice to negotiate the complex terrain, to persuade through evocation, suggestion, and feeling. He modulates, inflects, pauses, and carefully chooses words to create a layered performance of authority, reason, and common sense, constituting the tone of justice in his client’s favor.

Re-sounding justice in Guinea

I have focused my discussion here on the lawyer, while the perpetrator of sexual violence is himself largely beyond the scope of this article. But focusing on the lawyer, rather than his client, gives us a way to resist the binary oppositions that legal process demands, between bad

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11. VICE News (Zoledziowski 2022) reported during the Heard-Depp trial that most online observers considered him to the “real victim.” The report details a striking discordance in online commentary on the case, with Heard labeled a “monster” and a “sociopath,” despite the evidence of disturbing, violent messages from Depp..



perpetrator and good victim, between falsehood and truth. As noted, legal decisions unfold within broader understandings of social relations, power, and authority. Decisions are based not necessarily on the absolute truth, but rather on the legal claim that is most persuasive (Haack 2003).¹² Thus, each party to the proceedings is obliged to strategize within these understandings to make their claims heard. Engaging critically and closely with the lawyer's video allows us to analyze this process and its tensions. The lawyer here skillfully plays his part. While the law purports to be about fact and truth, the video shows that the lawyer is both aware of this legal fiction and able to maneuver around it. Within the context of a highly emotional and contentious trial, he strategically negotiates legal authority and social understandings, speaking to complex, contradictory ways of listening.

The video of the lawyer's statement highlights that "law is an activity driven by assertion" (Patterson 2003: 62), but also that those assertions resound, clash, compete, and extend well beyond the courtroom. Listening attentively to the events and people involved in this account raises questions about the larger tone of justice in Guinea. How do people listen? What do they listen to? What should be unspoken or only spoken indirectly?

The judicial ear, in Guinea as elsewhere, is tuned to certain forms of evidence and address, to particular sounds and voices of authority. In Guinea, women's voices are heard through multiple registers. On the one hand, the female voice indexes celebrated moments of mass political action in Guinea—both in the struggle for independence and in a series of demonstrations against the post-independence regime of Sékou Touré, in 1977 (Kaké 1987; Pauthier 2010; Schmidt 2005). On the other hand, the public listening ear hears women's voices as particularly able to shame others (Dave 2022b). In Guinea, as elsewhere around the world, women are expected to control their voices or else be accused of shamelessness. When they behave inappropriately—speaking too loudly or out of turn, registering anger—they inflict shame on others. It is this sonic environment that shapes the perpetrator's hearing of the voice of the female journalist, Moussa Yéro Bah.

The chain of events at issue here involves two women—the survivor and the journalist—yet the court case was

greatly dominated by male voices, from both legal teams to the judge. Bah testified on the stand but the recording of her voice was never admitted as evidence. The survivor did not speak at all. Furthermore, the case played out to a public ear that is often attuned to hearing journalists as noisy, disruptive, and disrespectful, and that perceives women's voices as largely unauthoritative and unreliable. These existing ways of listening shape understandings of both women's claims—the survivor and the journalist—before they have been formally adjudicated.

Such listening practices emerge in part from norms of discretion and obscurity in Guinea. Adrienne Cohen observes in her contribution to this Forum that Mande cultural ideologies greatly prize ambiguity and polysemy over transparency in speech and song. Speaking directly and unambiguously runs counter to powerful local sensibilities about thought, action, and social relations. The defamation suit against Bah reflects discomfort not just with journalists or women, but with the act of bringing things out into the open, of saying things out loud. In this context, if one makes a public accusation, one must be prepared for the necessary fallout. As Jesse Weaver Shipley notes in his article, racialized and gendered hierarchies assure that certain accusations—the accusations of the powerful—almost invariably trump others.

Yet while noting these features of the social and acoustic environment, we are also attentive to the fraught tensions that keep these norms continually evolving and unresolved. Justice sets the tone by extending the reach of the law and its decisions, but justice also exceeds the law and formal process. The lawyer refers to "the tone of justice" as its larger social impact, its long arm. Yet by making his statement outside of the courtroom, by continuing to press his argument to journalists, by strategically performing it through the voice of authority and common sense, he also acknowledges that justice is a living set of claims and expectations. A judge's speech act may deliver a verdict within a courtroom, but beyond that space, something more convincing and ongoing is required to make decisions relevant, understood, and accepted to the broader public. While a verdict suggests finality, this process of persuasion is never complete, as individuals and groups continue to seek and define justice beyond the law.

In addition to the foreground sounds that mark this series of events, we listen here to the tone of justice as this dynamic tension between formal process and outcomes, established norms of power and authority, and ordinary expectations and aspirations of fairness and

12. Haack and other legal scholars distinguish between substantive versus legal truth to highlight the existence of competing versions of the facts in legal processes (see, e.g., Brooks 2018).



repair. If particular voices and events here are the soundmarks of the case, to use R. Murray Schafer's term (1977), we can hear how these sounds play out against longstanding and contested hierarchies, social relations, and understandings. Listening in to the events, stories, voices, and experiences around *Big Mouth* allows us to explore ambiguity and competing modes of persuasion as part of the integral process of justice. As Susan Schmeiser notes, "each new [legal] case must . . . replay . . . the same old stories," presenting events and characters that resonate with existing stories and cognitive frameworks, with "preexisting (though evolving) narrative paradigms" (2006: 191). Recognizing both existing and evolving narratives, listening to competing claims within and beyond the courtroom, allows us to hear the workings of justice and its imperfect, sometimes impossible, pursuit.

References

- Anderson, Michelle J. 2005. "All-American rape." *St. John's Law Review* 79: 625–44.
- Boyle, Kaitlin M., and Kimberly B. Rogers. 2020. "Beyond the rape 'victim-survivor' binary: How race, gender, and identity processes interact to shape distress." *Sociological Forum* 35 (2): 323–45.
- Brooks, Peter. 2018. "Legal stories, the reality effect, and visual narratives: A response to Simon Stern." In *Narrative and metaphor in the law*, edited by Michael Hanne and Robert Weisberg, 140–49. Cambridge: Cambridge University Press.
- Bumiller, Kristin. 2008. *In an abusive state: How neoliberalism appropriated the feminist movement against sexual violence*. Durham, NC and London: Duke University Press.
- Clarke, Kamari. 2019. *Affective justice: The International Criminal Court and the Pan-Africanist pushback*. Durham, NC and London: Duke University Press.
- Clarke, Kamari, and Sara Kendall. 2020. "The beauty . . . is that it speaks for itself: Geospatial materials as evidentiary matters." *Law Text Culture* 23 (7): 91–118.
- Crenshaw, Kimberlé. 1991. "Mapping the margins: Intersectionality, identity politics, and violence against women of color." *Stanford Law Review* 43 (6): 1241–99.
- Dave, Nomi. 2019. *The revolution's echoes: Music, politics, and pleasure in Guinea*. Chicago and London: University of Chicago Press.
- . 2022a. "What do we hear in Depp v. Heard?" *Sounding Out!* September 19, 2022. <https://soundstudiesblog.com/2022/09/19/what-do-we-hear-in-depp-v-heard/>. Accessed September 19, 2022.
- . 2022b. "Big Mouth: Amplified feminism in Guinea." *Sound Studies* 9 (1). <https://doi.org/10.1080/20551940.2022.2133951>.
- Drabkin, William. 2001. "Tone (ii)." *Grove Music Online*. <https://www.oxfordmusiconline.com/grovemusic/view/10.1093/gmo/9781561592630.001.0001/omo-9781561592630-e-0000053933>. Accessed May 24, 2022.
- Dunn, Jennifer L. 2005. "'Victims' and 'survivors': Emerging vocabularies of motive for 'battered women who stay.'" *Sociological Inquiry* 75 (1): 1–30.
- Freyd, Jennifer J. 1997. "Violations of power, adaptive blindness and betrayal trauma theory." *Feminism & Psychology* 7 (1): 22–32.
- Haack, Susan. 2003. "Truth, truths, 'truth,' and 'truths' in the law." *Harvard Journal of Law and Public Policy* 26: 17–21.
- Kaké, Ibrahima Baba. 1987. *Sekou Touré: Le héros et le tyran*. Paris: Collection Jeune Afrique Livres.
- Ligon, Nicole. 2022. "Protecting women's voices: Preventing retaliatory defamation claims in the #MeToo context." *St. John's Law Review* 94: 961–69.
- Nordberg, Jenny. 2022. "The case that killed #MeToo in Sweden." *New York Times*, March 15, 2022. <https://www.nytimes.com/interactive/2022/03/15/opinion/cissi-wallin-fredrik-virtanen-metoo-sweden.html>. Accessed March 17, 2022.
- Patterson, Dennis. 2003. "From postmodernism to law and truth." *Harvard Journal of Law & Public Policy* 26: 49–65.
- Pauthier, Céline. 2010. "Le NON de la Guinée: Un lieu de mémoire national." In *Le NON de la Guinée (1958): Entre mythe, relecture historique et résonances contemporaines*, edited by Odile Goerg, Céline Pauthier, and Abdoulaye Diallo, 59–79. Paris: L'Harmattan.
- Sanday, Peggy Reeves. 1996. *A woman scorned: Acquaintance rape on trial*. Berkeley, Los Angeles and London: University of California Press.
- Schafer, R. Murray. 1977. *The soundscape: Our sonic environment and the tuning of the world*. Rochester, VT: Destiny Books.
- Schmeiser, Susan. 2006. "No truth machines: Law, psychoanalysis, uncertainty." *Law, Culture, and the Humanities* 2: 179–200.



- Schmidt, Elizabeth. 2005. *Mobilizing the masses: Gender, ethnicity, and class in the nationalist movement in Guinea, 1939–1958*. Portsmouth, NH: Heinemann.
- Stolworth, Jacob. 2022. “Johnny Depp trial: Petition to axe Amber Heard from Aquaman sequel exceeds 4 million signatures.” *The Independent*, May 17, 2022. <https://www.independent.co.uk/arts-entertainment/films/news/amber-heard-johnny-depp-trial-aquaman-2-b2080658.html>. Accessed June 14, 2022.
- Toop, David. 2010. *Sinister resonances: The mediumship of the listener*. London: Bloomsbury.
- Winter, Jessica. 2022. “The Johnny Depp-Amber Heard verdict is chilling.” *New Yorker*, June 2, 2022. https://www.newyorker.com/culture/cultural-comment/the-depp-heard-verdict-is-chilling#intcid=_the-new-yorker-bot-tom-recirc_1348c648-f4fb-46a8-8407-c82055c24f42_similar2-3. Accessed 2 June 2022.
- Zoledziowski, Anya. 2022. “Why does it seem like the entire Internet is team Johnny Depp?” *Vice News*, April 25, 2022. https://www.vice.com/en/article/4aw93j/justice-for-johnny-depp-internet-comments?utm_source=vicenewstwitter. Accessed June 16, 2022.

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