

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

SUNTRUST BANK as Trustee of)
the Stephens Mitchell trusts f/b/o Eugene)
Muse Mitchell and Joseph Reynolds Mitchell)
Plaintiff,)
v.)
HOUGHTON MIFFLIN COMPANY,)
Defendant.)

Civil Action File No.
1:01 CV-701-CAP

SUPPLEMENTAL DECLARATION OF BARBARA MCCASKILL

1. I have read the Affidavit of Alan Lelchuk (“Lelchuk Affidavit”), the Affidavit of Louis D. Rubin, Jr. (“Rubin Affidavit”), the Affidavit of Joel Conarro (“Conarro Affidavit”), and the Affidavit of Gabriel Motola (“Motola Affidavit”).

2. Dr. Rubin acknowledges that “During the later chapters of ‘Wind Done Gone’ there are more significant characters importantly involved who are not drawn from the well-known ambiance of Margaret Mitchell’s novel and the Selznick movie” (Rubin Affidavit ¶5). He nonetheless argues that “Ms. Randall’s work draws upon the reader’s familiarity with the characters of ‘Gone With the Wind’ for purposes of developing a plot that is fully as melodramatic as the original, but largely without the powerful characterizations and embodied elements of historical myth that have made Margaret Mitchell’s fiction memorable.” (Rubin Affidavit ¶8). In his only example supporting this conclusion, Dr. Rubin finds that the letters between E. and P. in *The Wind Done Gone* would have “little meaning if it were not for the romantic intensity

of the Ellen-Phillippe episode in 'Gone With the Wind.'" **However, this could not be further from the truth.**

3. *The Wind Done Gone* cursorily references the Ellen/Philippe relationship in *Gone With the Wind* only to parody assumptions about racial identity in *Gone With the Wind* and to develop Randall's original theme of miscegenation. Lady and Feleepe's story in *The Wind Done Gone* is ultimately a story of the tragic consequences of race-mixing, and the "romantic intensity" of Lady and Feleepe's love is demonstrated by their willingness to risk having a black baby in order to be together. Randall's intention of developing the theme of race-mixing through these letters is apparent from the relationship of the Lady/Feleepe letters to the two other letters in *The Wind Done Gone*, which also center on the theme of miscegenation. Planter writes the first of these letters to his friend Thomas in order to settle the "good price" of a dollar for Cynara. After twice referring to his plan to sell her as "a delicate situation," he acknowledges the open secret of her mixed-race ancestry by describing her as "my girl" and "someone who looks so much like my sainted mother." (37-38) The second letter is written by Mammy to R., and requests that R. marry her daughter Cynara. Again, this letter makes prominent the theme of race-mixing by describing Cynara as a "love child" and also by mentioning "you little Precious," the child of Other and R., who is also part black as a consequence of Other's blackness. (159) Clearly, Randall is developing her original theme of miscegenation rather than justifying her characters' motivations by referring to Mitchell's romance.

4. It is obvious from the foregoing that miscegenation is a significant theme in *The Wind Done Gone*, developed to ridicule *Gone With the Wind's*

assumptions about racial purity and corruption. The relationships between R. and Cynara, Mammy and Planter, Other and R., and Lady and Feleepe are developed in *The Wind Done Gone* in order to reveal how discussions of miscegenation were suppressed among the planter class and also to expose the sometimes tragic consequence of these unions for both blacks and whites.

5. Dr. Rubin implies in ¶14 of his affidavit that Randall's intent in including intimate scenes between R. and Cynara in her novel is to "draw upon the reading public's interest in sexual description." On the contrary, such scenes are not casually included. To parody *Gone With the Wind's* many melodramatic romances between whites and the absence of such encounters between blacks, Randall introduces the notion that a black woman and former slave like Cynara can have a romance sensitively, perceptively, and passionately. In doing so, Randall makes a careful and well-considered artistic choice to develop scenes of intimacy between R. and Cynara specifically to lead into memories from Cynara's childhood, such as her relationship with Mammy, and issues of her adulthood, such as her childlessness and her relationships to the communities of free blacks and former slaves. Tellingly, the scene cited by Dr. Rubin is anticipated by the statement "[R.] can bring his history into my house; I can't bring my past." (27). These scenes are very brief, often occurring in a single paragraph. Moreover, much of the language in the scenes is couched in metaphorical and poetic language: in the scene to which Dr. Rubin objects, for example, Cynara invites R. with the humorous euphemism "The morning dew is on the Southern lawn" after which "he would laugh" (29).

6. Dr. Conarroe observes in ¶6 of his affidavit that serious writers of fiction have written about the lives of slaves without referencing *Gone With the Wind*. However, this misses the point. *Gone With the Wind*, perhaps more than any popular work, continues to influence current perspectives on slavery, the Civil War, and Reconstruction. It is precisely because of *Gone With the Wind*'s pervasive and ongoing presence that Randall's novel is appropriate, necessary, and educational. *The Wind Done Gone* exposes and criticizes through parody *Gone With the Wind*'s demeaning portrayals of black characters as lazy, ignorant, dull, and apelike, and its omission of the black perspective. **The fact that other writers have written fictions about slavery has no bearing on whether Ms. Randall may criticize the hurtful and persistent misrepresentations in *Gone With the Wind*.**

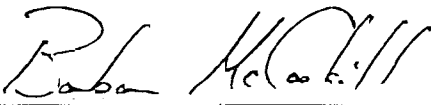
7. Indeed, the continuing appeal of works that revisit the history of slavery like Alex Haley's *Roots*, Toni Morrison's *Beloved*, and August Wilson's "The Piano Lesson," (all winners of the Pulitzer Prize), Charles Johnson's *Middle Passage* (winner of the National Book Award), Lucille Clifton's *Good Woman*, Octavia Butler's *Kindred*, George Wolfe's "The Colored Museum," and Sherley Anne Williams' *Dessa Rose* substantiate the fact that racial relationships in the antebellum and postbellum South are still very much a topic of social and political concern. Further evidence of this continuing concern is the popularity of depictions of slavery by visual artists such as Jacob Lawrence, Atlanta's own Radcliffe Bailey and Kara Walker, Glenn Ligon, Pat Ward Williams, Faith Ringgold, Bettye Saar, and Carrie Mae Weems. Cincinnati's National Underground Railroad Freedom Center will open in 2004, and academic institutions such as Yale University's Gilder Lehrman Center for the Study of Slavery, Resistance, and

Abolition exist for the sole purpose of studying this era and related moments. Thus, Dr. Rubin's opinion that "racial stereotypes" have "long since been exploded" by other works (Rubin Affidavit ¶¶10,11) fails to recognize that racial stereotypes and slavery are still the subjects of significant political, social, and cultural interest.

8. Anyone who believes that pejorative characterizations of blacks are not currently accepted by many who cling to the "historical myth" of *Gone With the Wind* (Rubin's Affidavit ¶8) must live in a different world than I do. Although we are more than a century removed from the 1850s and 1860s, the issues that the period raises—racism, stereotyping, oppression of women and blacks, what was lost and what was gained through slavery—still linger, especially in the minds of black readers. "The problem of the Twentieth Century is the problem of the color-line," wrote philosopher and educator W.E.B. Du Bois. At the turn of the 21st, the public discussion raised by books such as *The Wind Done Gone* is critical to the continued search for healing and truth in our country.

9. Dr. Rubin can find neither burlesque nor ridicule (Rubin Affidavit, ¶7), and Dr. Conarroe can find neither wit nor humor (Conarroe Affidavit, ¶7), in *The Wind Done Gone*. However, as I have meticulously demonstrated in my previous declaration through numerous specific examples, *The Wind Done Gone* does consistently and effectively use wit, humor, and satire to parody and ridicule *Gone With the Wind*. While it is possible that readers unfamiliar with contemporary African American literature and oral culture might not readily observe these elements, a close and sensitive reading of *The Wind Done Gone* readily reveals ample use of them.

This declaration is true and correct. I make this declaration under penalty of perjury. This 16th day of April, 2001.



Barbara McCaskill, Ph.D.