

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION**

WILL McRANEY

PLAINTIFF

v.

No. 1:17cv080-GHD-DAS

**THE NORTH AMERICAN MISSION BOARD
OF THE SOUTHERN BAPTIST CONVENTION, INC.**

DEFENDANT

AFFIDAVIT OF CARLOS FERRER

Personally appeared before the undersigned attesting authority authorized by law to administer oaths, Carlos Ferrer, who, after first being duly sworn, states and affirms the following:

1. My name is Carlos Ferrer. I am over the age of 18 years, am otherwise *sui juris*, and am competent to testify to the matters set forth herein. This affidavit is made and given based upon my personal knowledge.

2. I am the Executive Vice President of the Defendant, The North American Mission Board of the Southern Baptist Convention, Inc. ("NAMB"). I am responsible for management and supervision of shared services at NAMB, including, but not limited to, financial services, accounting, and budgeting.

3. During each of the fiscal years from 2013 through 2018, NAMB provided and continues to provide financial support to the Baptist Convention of Maryland/Delaware ("BCMD") for the purpose of supporting BCMD's ministries and operations pursuant to one or more cooperation agreements between NAMB and BCMD. As of October 17, 2018, the total amount of such financial support provided by NAMB to BCMD during such time period is \$5,237,886.00.

4. During each of the fiscal years from 2013 through 2018, NAMB also provided and continues to provide nonmonetary support to BCMD in coordination with BCMD and for the

Exhibit "A"

purpose of supporting BCMD's ministries and operations. Such nonmonetary support includes, *inter alia*: (a) coordinated discovery, assessment, coaching, and development of church-planting pastors and missionaries; (b) equipping BCMD's pastors, missionaries, and ministry leaders with certain tools, training events and materials, and other ministry resources; (c) national recruiting and advocacy with churches and ministries outside BCMD's territory to develop and mobilize support of and partnership with BCMD's churches and pastors; (d) church revitalization; (e) chaplaincy endorsement; and (e) national support and coordination with BCMD's disaster response ministry.

5. This Affidavit is given for use as evidence in the above-captioned action and may be used in any hearing upon any motion for summary judgment or other hearing in connection with such case, coming on any date certain and from time to time until this matter is disposed of.



Carlos Ferrer, Affiant
Date: October 18, 2018

Sworn to and subscribed before me on
This 18th day of October, 2018.



NOTARY PUBLIC, State of Georgia
My Commission Expires: 5/31/19



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No. 1:17cv080-GHD-DAS

**THE NORTH AMERICAN MISSION BOARD
OF THE SOUTHERN BAPTIST CONVENTION, INC.**

DEFENDANT

**AFFIDAVIT OF TOM STOLLE IN SUPPORT OF THE
BAPTIST CONVENTION OF MARYLAND/DELAWARE'S MOTION TO QUASH**

I, Tom Stolle, hereby affirm under the penalties of perjury that the matters set forth below are true:

1. I am over the age of eighteen, I am competent to be a witness in this action, and I have personal knowledge of the matters and facts set forth herein.

2. I am the Associate Executive Director of the Baptist Convention of Maryland/Delaware ("BCMD"). In that role I serve as human resources director and supervise BCMD's finance, accounting, and budgeting.

3. The North American Mission Board ("NAMB") has contributed approximately fifteen to twenty percent of the financial support needed to run BCMD for each of the past five years. This excludes the revenue and expenses of a retreat center, which is operated separately.

4. As part of my professional responsibilities, I was involved in Dr. McRaney's separation from BCMD, including working to negotiate and finalize the attached Separation Agreement and Release.

5. Attached to this Affidavit as Exhibit A is a true and correct copy of the Separation Agreement and Release between Dr. McRaney and BCMD.

6. Attached to this Affidavit as Exhibit B is a true and correct copy of the Subpoena *duces tecum* served on BCMD by NAMB.

Date: October 3, 2018


Tom Stolle, Affiant