

**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 R. DAVID DE ARMAS, ESQ.

**STATE OF FLORIDA
COUNTY OF ORANGE**

I, R. David de Armas, do hereby affirm under penalty of perjury, that the matters set forth below are true:

1. I am over the age of eighteen (18) and am competent to execute this affidavit, the substance of which is based on my personal knowledge as former counsel for Will McRaney.

2. I am an attorney licensed to practice in Florida as a member of The Florida Bar, and have been so licensed since 1985. I represented Dr. McRaney during the process of his leaving the employ of the Baptist Convention of Maryland/Delaware, Inc. ("BCMD") in 2015.

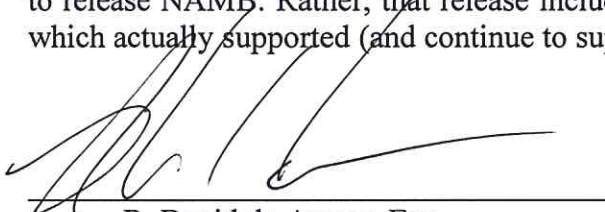
3. I personally reviewed and approved the Separation Agreement and Release signed by Dr. McRaney as part of the settlement with BCMD.

4. As part of the process of advising Dr. McRaney, I confirmed that BCMD annually sent substantially more money to the North American Mission Board ("NAMB") than the NAMB sent to BCMD.

5. Thus, it was obvious that the NAMB was not a supporting organization of the BCMD. Indeed, it is BCMD which supported (and likely continues to support) the NAMB, not the other way around. Assertions to the contrary are misleading, at best.


6. Before executing the Separation Agreement and Release in favor the BCMD, Dr. McRaney specifically asked me whether the Separation Agreement and Release would preclude claims against the NAMB. Based on the records provided to me showing that NAMB was clearly not a supporting organization of the BCMD, I advised Dr. McRaney that he could execute the Separation Agreement and Release and maintain his claims against the NAMB.

7. At no time did Dr. McRaney intend that his settlement with BCMD would release the NAMB for the harm caused by the NAMB, nor did the release executed by Dr. McRaney serve to release NAMB. Rather, that release included only those churches in Maryland and Delaware which actually supported (and continue to support) the BCMD.



R. David de Armas, Esq.

SWORN TO AND SUBSCRIBED BEFORE ME, this 21st day of November, 2018.



NOTARY PUBLIC

My Commission Expires:

(SEAL)

