

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

Will McRaney,

Plaintiff,

v.

The North American Mission Board of the
Southern Baptist Convention, Inc.,

Defendant.

Case No. 1:17-cv-00080-GHD-DAS

**PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF
DISCOVERY MATERIAL FROM DEFENDANT**

Pursuant to Federal Rules of Civil Procedure 26 and 37, Plaintiff moves to compel the production of discovery material from Defendant, as detailed in the accompanying memorandum.

Attached as Exhibits to this Motion are:

Exhibit 1: Plaintiff's Second Set of Requests for Production

Exhibit 2: NAMB's Objections and Responses to Plaintiff's Second Set of Requests for Production

Exhibit 3: August 12, 2022 Letter from Counsel for NAMB

Exhibit 4: NAMB's Amended Privilege Log

Exhibit 5: Plaintiff's First Set of Requests for Production

Exhibit 6: Danny Wood Deposition Transcript (excerpts)

Exhibit 7: Danny Wood Deposition, Plaintiff's Exhibit 9

Exhibit 8: Email correspondence between Counsel regarding collection and production of documents from NAMB Trustees

Exhibit 9: NAMB's Responses to Plaintiff's Third Set of Requests for Production

Exhibit 10: NAMB's First Set of Requests for Production to Plaintiff

Exhibit 11: NAMB's First Set of Interrogatories to Plaintiff

Exhibit 12: NAMB Subpoena to Robert D. (Bob) Rodgers

Exhibit 13: Email correspondence between Bob Rodgers and Counsel for NAMB

Exhibit 14: Email correspondence between Counsel regarding NAMB's Work Product assertion

Exhibit 15: Danny Wood Deposition, Plaintiff's Exhibit 2

Plaintiff hereby certifies that Plaintiff's counsel has conferred in good faith with counsel for Defendant to obtain the discovery sought without Court intervention, as reflected in email correspondence between the parties and Judge Sanders. This Motion is filed with the permission of the Court.

Defendant has conveyed to Plaintiff that it opposes this Motion.

October 31, 2022

Respectfully Submitted,

Scott E. Gant

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