

**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

DECLARATION OF SCOTT E. GANT

I, Scott E. Gant, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney licensed to practice law in the District of Columbia, a member in good standing of the District of Columbia Bar, and admitted to appear *pro hac vice* before this Court. I am an attorney with Boies Schiller Flexner LLP (“BSF”), and counsel of record for Plaintiff, Dr. Will McRaney, in this matter. I make this declaration based upon my personal knowledge of the facts stated herein, and if called to testify, I could and would testify competently thereto. I submit this declaration in support of Dr. McRaney’s Motion for Summary Judgment With Respect to NAMB’s “Separation Agreement Defenses” (Defenses 4-7).

2. Attached hereto as Exhibit A is a true and correct copy of Defendant NAMB’s Responses to Plaintiff’s Second Set of Interrogatories dated October 12, 2022.

3. Attached hereto as Exhibit B is a true and correct copy of excerpts from Defendant NAMB's 30(b)(6) Deposition Transcript dated March 3, 2023 and accompanying Exhibits 20, 21, and 22.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts from Carlos Ferrer's Deposition Transcript dated September 23, 2022 and accompanying Exhibit 14.

5. Attached hereto as Exhibit D is a true and correct copy of excerpts from Steve Davis's Deposition Transcript dated February 9, 2023.

6. Attached hereto as Exhibit E is a true and correct copy of Exhibits 30 and 31 from Mike Ebert's Deposition dated March 1, 2023.

7. Attached hereto as Exhibit F is a true and correct copy of excerpts from William Warren's Deposition Transcript dated May 4, 2023.

8. Attached hereto as Exhibit G is a true and correct copy of excerpts from Danny de Armas's Deposition Transcript dated February 16, 2023 and accompanying Exhibit 5.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 18, 2023


