

# EXHIBIT D

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF MISSISSIPPI

3 CASE NO.: 1:17-cv-00080-GHD-DAS

4 Will McRaney,  
5 Plaintiff,

6 v.

7 The North American Mission  
8 Board of the Southern Baptist  
9 Convention, Inc.,  
Defendant.

\_\_\_\_\_ /

10  
11 VOLUME I (Pages 1-165)  
12

VIRTUAL ZOOM

13 DEPOSITION OF: STEVE DAVIS  
14 DATE: February 9, 2023  
15 TIME: 8:33 a.m. - 12:04 p.m.  
16 TAKEN BY: Plaintiff  
17 PLACE: Virtual Zoom  
18 REPORTED BY: SUSAN WINTER, CSR, RPR  
Notary Public, State of Florida

19  
20  
21  
22  
23  
24  
25

Page 30

1 finishing -- do you do a dissertation to get a  
 2 doctorate in ministry?  
 3 A. Yes.  
 4 Q. Okay. So is that what was happening? You  
 5 had finished your classwork?  
 6 A. Yes.  
 7 Q. And what was your doctorate or your thesis  
 8 in?  
 9 A. In church planting.  
 10 Q. Do you remember the title?  
 11 A. I think the title was A Strategy For  
 12 Starting Southern Baptist Churches.  
 13 Q. And were you a pastor at University  
 14 Baptist Church?  
 15 A. Yes.  
 16 Q. And what was the time period you served as  
 17 pastor there?  
 18 A. '76, and I was there six years to '82.  
 19 Q. And where did you go from there?  
 20 A. I went to Castle Hills First Baptist in  
 21 San Antonio from '82 to '89, and I was the associate  
 22 pastor.  
 23 Q. Where did you go next?  
 24 A. First Baptist Church, Humble, Texas, in  
 25 the Houston area for five years from '89 to '94.

Page 31

1 Well, actually, December of '93, I guess. I started  
 2 then at First Baptist in Garland, Texas, in the  
 3 Dallas area in January of '94.  
 4 Q. Okay.  
 5 A. And was there 10 -- 10 years.  
 6 Q. All right. Until you became executive  
 7 director at the State Convention of Indiana?  
 8 A. That's correct.  
 9 Q. Okay. And how long did you have that  
 10 executive director position in Indiana?  
 11 A. Almost nine years.  
 12 Q. Is that similar to the position that  
 13 Dr. McRaney had at BCMD?  
 14 A. Yes. Yeah. Exact -- exact same position.  
 15 Q. Okay. And just for -- to make sure we're  
 16 on the same page.  
 17 What do you understand I'm referring to  
 18 when I say BCMD?  
 19 A. The Baptist Convention of Maryland/Delaware.  
 20 Q. Okay. And how long were you at the State  
 21 Convention Indiana as an executive director?  
 22 A. Almost nine years.  
 23 Q. Until --  
 24 A. February --  
 25 Q. -- 2000 --

Page 32

1 A. February of 2011 is when I went -- went on  
 2 board as a vice president for the midwest region  
 3 with the North American Mission Board.  
 4 Q. That was your first position at NAMB?  
 5 A. Yes, sir.  
 6 Q. Okay. So how long were you vice president  
 7 for the midwest region at NAMB?  
 8 A. Well, I was the vice president for --  
 9 right at two years. And then I was asked to move to  
 10 take over the south convention region, so -- and  
 11 then when we lost the executive director that  
 12 followed me in the midwest, I assumed -- most of the  
 13 midwest conventions was my responsibility.  
 14 And then when Jeff Christopherson at NAMB  
 15 moved into a different position, they asked me to  
 16 also work with the northeast conventions. So by the  
 17 time I retired with NAMB, I was covering that  
 18 large -- that large area. Basically everything from  
 19 Oklahoma and Texas east was -- were the conventions  
 20 I worked with.  
 21 Q. Okay. Did you still have responsibility  
 22 for the northeast at the time you retired from NAMB?  
 23 A. Yes.  
 24 Q. Okay. When, as best you recall, did you  
 25 assume responsibility for the northeast region at

Page 33

1 NAMB?  
 2 A. January of 2015, right about there. It  
 3 was kind of --  
 4 (Inaudible crosstalk.)  
 5 A. It was after our January meeting, so it  
 6 wasn't like January 1. It would be more like the  
 7 middle of January.  
 8 Q. (By Mr. Gant): Okay. So am I right that  
 9 you had responsibility for the northeast region at  
 10 NAMB for approximately four years from January 2015  
 11 to January 2019?  
 12 A. That's correct.  
 13 Q. Okay. And I think you said you retired on  
 14 or around January 1st, 2019; is that right?  
 15 A. That's right.  
 16 Q. Were you employed at NAMB into 2019 at  
 17 all, or did it end at the end of December 2018?  
 18 A. No. It end -- it ended there. Yeah.  
 19 Q. Okay. So you were not an employee of NAMB  
 20 at any time in 2019 or after, correct?  
 21 A. No. Now, I did -- I did some consulting  
 22 work for a couple of conventions. NAMB asked if I  
 23 could help them. They had lost their executive  
 24 directors and they asked if I could help them in  
 25 their executive director search.

Page 34

1 Q. When was this consulting work for NAMB?  
 2 A. I don't remember the date, but I helped  
 3 the Ohio Convention in their executive director  
 4 search. So that would have been probably three  
 5 years ago maybe.  
 6 Q. Any other consulting work for NAMB that  
 7 you recall?  
 8 A. No. That was it.  
 9 Q. Okay. And how were you compensated? Was  
 10 it hourly or on some other basis?  
 11 A. Just expenses basically and my time.  
 12 Yeah.  
 13 Q. Well, how did you charge for your time?  
 14 On an hourly basis or some other basis?  
 15 A. It basically just -- basic -- basically  
 16 the time it took me to go for a meeting and, you  
 17 know, if I had a phone conversation or something  
 18 that was an hour or so, it was kind -- kind of like  
 19 that.  
 20 It wasn't really -- it was more or less  
 21 just an honorarium plus expenses, I guess, is how I  
 22 would word it.  
 23 Q. So was it a flat fee that you came up with  
 24 or did it --  
 25 A. No. I didn't -- I didn't -- I didn't

Page 35

1 really ask for anything. They just said, Well,  
 2 we're going -- we're going to give you a couple  
 3 thousand dollars for what you've done.  
 4 Q. Do you have an ongoing or open-ended  
 5 consulting relationship with NAMB, or is it  
 6 concluded?  
 7 A. Oh, no. That was just for that specific  
 8 thing that they asked me if I would help them.  
 9 Q. Okay. Have you done any consulting work  
 10 for NAMB in connection with Dr. McRaney or this  
 11 case?  
 12 A. No, sir.  
 13 Q. Since you retired from NAMB at the end of  
 14 December 2018, who, if anyone, from NAMB either past  
 15 or current personnel have you spoken with about  
 16 Dr. McRaney or this case?  
 17 A. No one. The only one I've talked with  
 18 would be George McCallum, the -- NAMB's attorney  
 19 who -- who just called to let me know that, you  
 20 know, just an update that there would be a time of  
 21 deposition. So that -- but as far as any other  
 22 conversations, I've had no conversations with anyone  
 23 anywhere about this at all.  
 24 Q. Have you done any independent reading  
 25 about this case, any aspect --

Page 36

1 A. No.  
 2 Q. -- of it?  
 3 A. No.  
 4 Q. Have you read any articles in the media or  
 5 on blogs about this case?  
 6 A. The only articles I've read would be what  
 7 was posted in Baptist Press, the national Baptist  
 8 Press, a couple times where they had an article that  
 9 the case was moving forward and -- that's all.  
 10 Q. What about any other publications that  
 11 have discussed the case?  
 12 A. No, nothing.  
 13 Q. I take it from your answer you have not  
 14 read, let's call it the complaint, or supplemental  
 15 pleading? These are the documents that formally  
 16 describe the claims and allegations in the case.  
 17 Have you ever read any of those?  
 18 A. No, sir.  
 19 Q. Okay. Have you ever read any legal  
 20 filings by NAMB in this case that --  
 21 A. No, sir.  
 22 Q. -- you recall?  
 23 A. No, sir.  
 24 Q. Okay. When you spoke with Ms. Carrington  
 25 on the phone on either occasion, did she say

Page 37

1 anything about NAMB's position? NAMB says, It's not  
 2 true, we deny the allegation, the allegations are  
 3 false, anything like that?  
 4 A. No, sir.  
 5 MS. CARRINGTON: Objection to the form of  
 6 the question.  
 7 But you can answer.  
 8 A. No.  
 9 Q. (By Mr. Gant): So I take it then you  
 10 don't actually know what Dr. McRaney is alleging in  
 11 his lawsuit; is that correct?  
 12 MS. CARRINGTON: Object to the form of the  
 13 question.  
 14 A. Not to the specifics, just the  
 15 generalities that I've shared with you earlier.  
 16 Q. (By Mr. Gant): Okay. But if you haven't  
 17 read the lawsuit, how do you even know the  
 18 generalities of what Dr. McRaney is alleging?  
 19 A. That's what I explained to you before.  
 20 That's -- that's kind of what -- I can't remember  
 21 whether it was Kat or Derek that was sharing with me  
 22 this -- these are the things.  
 23 Q. Okay.  
 24 A. Just in general.  
 25 Q. Oh, NAMB's lawyers described to you some

Page 247

1 break that Kat requested.  
 2 THE VIDEOGRAPHER: We're going off the  
 3 video record. The time is 2:42. This  
 4 concludes Media Unit 3.  
 5 You may proceed. Sorry.  
 6 We're going off the record.  
 7 (A brief recess was taken.)  
 8 THE VIDEOGRAPHER: We're back on the video  
 9 record. The time is 2:53 p.m. This begins  
 10 Media Unit 4.  
 11 MR. GANT: Okay. Our next exhibit is  
 12 going to be 24, which is Tab Number 18, I  
 13 believe.  
 14 THE CONCIERGE: (Complies.)  
 15 MR. GANT: It's Bates-labeled NAMB 6790  
 16 through 93.  
 17 (Deposition Exhibit No. 24 was marked for  
 18 identification.)  
 19 Q. (By Mr. Gant): You're welcome to read the  
 20 whole exchange, but I'm actually only going to ask  
 21 you about the top email there which is right in  
 22 front of you on the screen.  
 23 A. Okay.  
 24 Q. Is this an email from Dr. McRaney to you  
 25 dated February 9, 2015?

Page 248

1 A. That's what it looks like, yes.  
 2 Q. Okay. Do you remember receiving this  
 3 email?  
 4 A. I'm reading it now.  
 5  
 6 THE WITNESS: Okay. You can scroll down.  
 7 Is there more?  
 8 Q. (By Mr. Gant): I'm just asking you about  
 9 the top email.  
 10 A. Okay. Yeah. Sure. I mean, I don't -- I  
 11 didn't remember it, but, yes, I read it and I see  
 12 the content. Yes.  
 13 Q. Okay. Do you have any reason to doubt  
 14 that you received this email from Dr. McRaney?  
 15 A. No.  
 16 Q. Do you have any reason to doubt that it is  
 17 an accurate copy of the email that Dr. McRaney sent  
 18 to you?  
 19 A. No.  
 20 MR. GANT: All right. You can put that  
 21 aside.  
 22 THE CONCIERGE: (Complies.)  
 23 MR. GANT: The next exhibit is 25, Tab 37,  
 24 which is Bates-labeled NAMB 6807 through 6813.  
 25 No. That's the wrong one.

Page 249

1 THE CONCIERGE: Sorry, Counsel. That was  
 2 Tab 25. One moment.  
 3 MR. GANT: Tab 37, please.  
 4 THE CONCIERGE: (Complies.)  
 5 MR. GANT: That's it. Okay.  
 6 (Deposition Exhibit No. 25 was marked for  
 7 identification.)  
 8 Q. (By Mr. Gant): And I'm just going to ask  
 9 about -- like the previous exhibit, you're welcome  
 10 to review as much as you want, but I'm only going to  
 11 ask you about the top email.  
 12 A. Okay.  
 13 Q. So the top email there is an email from  
 14 you to Dr. McRaney dated February 10, 2015.  
 15 Do you see that?  
 16 A. Yes.  
 17 Q. Okay. Do you have any reason to doubt  
 18 that you received that email from -- strike that.  
 19 Do you have any -- do you recognize the  
 20 email?  
 21 A. Yes. I mean, I don't recall it, but I'm  
 22 reading it and I know it's from me, so yes.  
 23 Q. You -- you believe that that is an email  
 24 that you sent to Dr. McRaney?  
 25 A. Yes.

Page 250

1 Q. Okay.  
 2 MR. GANT: All right. You could put that  
 3 aside for now. Thank you.  
 4 THE CONCIERGE: (Complies.)  
 5 MR. GANT: The next exhibit is 26, Tab 19,  
 6 Bates-labeled NAMB 6802 through 6805.  
 7 THE CONCIERGE: (Complies.)  
 8 (Deposition Exhibit No. 26 was marked for  
 9 identification.)  
 10 Q. (By Mr. Gant): I'm going to have the  
 11 court reporter (sic) go to the bottom, the first  
 12 email in time, and then ask to scroll up at your  
 13 direction so that you can look at the whole thing  
 14 and then I'm going to ask you similar questions I've  
 15 asked the past few exhibits.  
 16 A. Okay.  
 17 THE WITNESS: Okay. You can scroll up.  
 18 THE CONCIERGE: (Complies.)  
 19 THE WITNESS: Whoa, whoa, whoa, whoa.  
 20 Okay. Hold on just a second. Can you back it  
 21 up just a little?  
 22 THE CONCIERGE: (Complies.)  
 23 THE WITNESS: A little more.  
 24 Is that a response?  
 25 THE CONCIERGE: (Complies.)

Page 251

1 THE WITNESS: Okay.  
 2 MS. CARRINGTON: I think that's the  
 3 signature line for Jeff for the next email.  
 4 THE WITNESS: Okay. You can scroll on up.  
 5 THE CONCIERGE: (Complies.)  
 6 THE WITNESS: Okay. Scroll on up.  
 7 THE CONCIERGE: (Complies.)  
 8 THE WITNESS: Okay. Scroll on up.  
 9 THE CONCIERGE: (Complies.)  
 10 THE WITNESS: Okay.  
 11 THE CONCIERGE: (Complies.)  
 12 THE WITNESS: Okay. Scroll on up.  
 13 THE CONCIERGE: (Complies.)  
 14 THE WITNESS: Okay. Scroll up.  
 15 THE CONCIERGE: (Complies.)  
 16 THE WITNESS: All right.  
 17 THE CONCIERGE: (Complies.)  
 18 THE WITNESS: Okay.  
 19 THE CONCIERGE: (Complies.)  
 20 THE WITNESS: Okay. You can scroll up.  
 21 MR. GANT: That's the last -- that's the  
 22 first page.  
 23 THE WITNESS: Okay.  
 24 Q. (By Mr. Gant): All right. Have you had a  
 25 chance to review Exhibit 26?

Page 252

1 A. Yes.  
 2 Q. Is Exhibit 26 a series of emails that you  
 3 either wrote or received?  
 4 A. Yes.  
 5 Q. Do you have any reason to doubt that these  
 6 are true and accurate copies of emails that you  
 7 wrote and received?  
 8 A. No.  
 9 MR. GANT: You can put that aside. Thank  
 10 you.  
 11 THE CONCIERGE: (Complies.)  
 12 MR. GANT: The next exhibit is 27, Tab 20,  
 13 please.  
 14 THE CONCIERGE: (Complies.)  
 15 MR. GANT: This is Bates-labeled NAMB 6896,  
 16 one-page document.  
 17 (Deposition Exhibit No. 27 was marked for  
 18 identification.)  
 19 Q. (By Mr. Gant): I'd ask you to direct the  
 20 court reporter (sic) and just read this and then  
 21 I'll ask you a couple of questions.  
 22 A. Okay.  
 23 THE WITNESS: Okay. You can scroll up.  
 24 THE CONCIERGE: (Complies.)  
 25 THE WITNESS: Okay.

Page 253

1 THE CONCIERGE: (Complies.)  
 2 THE WITNESS: Okay.  
 3 THE CONCIERGE: (Complies.)  
 4 MR. GANT: I should have said the exhibit  
 5 is 96 to 97, but there's no substantive content  
 6 on 97, but it is part of the exhibit.  
 7 Q. (By Mr. Gant): Have you had a chance to  
 8 review Exhibit 27?  
 9 A. Yes.  
 10 Q. Do you recognize this?  
 11 A. Yes.  
 12 Q. What is it?  
 13 A. I'm sorry?  
 14 Q. What is it?  
 15 A. It's an email regarding how -- how we were  
 16 going to handle insurance for Michael Crawford.  
 17 Q. And it's an email that you wrote to  
 18 Dr. McRaney on March 2nd, 2015, correct?  
 19 A. That's correct. Right.  
 20 Q. Okay. All right. For some reason NAMB,  
 21 when they produced it, blocked out all the money  
 22 figures in the email that you wrote. I'm not sure  
 23 why. But speaking of money, I didn't ask you  
 24 earlier and meant to.  
 25 What was your salary from NAMB at the time

Page 254

1 you retired?  
 2 A. I don't remember. I'm sorry.  
 3 Q. What's your best estimate?  
 4 A. I'd say 90,000, maybe 100. I'm not sure.  
 5 Somewhere in that neighborhood.  
 6 Q. Okay. And then did you receive benefits  
 7 in addition?  
 8 A. Benefits such as?  
 9 Q. Health insurance.  
 10 A. Yes, health insurance and reimbursement  
 11 for business expenses. Yeah.  
 12 Q. Okay. Any other benefits you can think  
 13 of, financial benefit?  
 14 A. No.  
 15 Q. Okay. Have you ever heard the term  
 16 supporting organization used at the time you worked  
 17 at NAMB?  
 18 A. Supporting organization? No. I don't  
 19 recall that.  
 20 Q. Okay. Are you personally aware of  
 21 Dr. McRaney ever having lied to anyone?  
 22 MS. CARRINGTON: Object to the form of the  
 23 question.  
 24 A. I'm having a hard time trying to answer  
 25 that because in a meeting -- in that February

Page 255

1 meeting Will was -- I can't remember what was --  
 2 what was said. All I remember was there were things  
 3 that he said that were complete opposite that  
 4 contradicted what Kevin had said.  
 5 And at one point in the meeting one of his  
 6 board officers said, But we don't believe our  
 7 executive director is a liar and we don't believe  
 8 Kevin is a liar. That statement was made at a  
 9 meeting. And I remember sitting there thinking,  
 10 Well, one of them isn't telling the truth.  
 11 Because you can't say this and you can't  
 12 say that, the direct opposite, and say that both of  
 13 them are true when both of them are the exact  
 14 opposite of what was said.  
 15 So I guess that's the only way I can  
 16 respond. Other than that, I would say no.  
 17 Q. Okay. So you don't remember any instance  
 18 in which you heard Dr. McRaney say something that  
 19 you -- or write something that you knew based on  
 20 your own personal experience or observations was  
 21 false?  
 22 A. No.  
 23 Q. On your LinkedIn page you have written  
 24 Senior Pastor Baptist Southern Convention June 1976  
 25 to June 2011.

Page 256

1 Were you aware of that?  
 2 A. To June 2011?  
 3 Q. Yes.  
 4 MR. GANT: Let's just bring it up.  
 5 A. No.  
 6 MR. GANT: It's Tab -- Tab 1.  
 7 THE CONCIERGE: (Complies.)  
 8 MR. GANT: I guess we'll mark it as  
 9 Exhibit 28.  
 10 (Deposition Exhibit No. 28 was marked for  
 11 identification.)  
 12 (By Mr. Gant): Before we go to this  
 13 exhibit, just to follow up on something I asked you  
 14 a moment ago.  
 15 I asked you if you'd ever heard the phrase  
 16 supporting organization. You said, no, correct?  
 17 A. That's correct.  
 18 Q. Did you ever hear anyone describe NAMB as  
 19 a supporting organization of BCMD?  
 20 MS. CARRINGTON: Object to the form of the  
 21 question.  
 22 A. I don't remember that term.  
 23 Q. (By Mr. Gant): So I take it -- I take it  
 24 you don't remember anyone ever referring to NAMB as  
 25 a supporting organization of BCMD; is that correct?

Page 257

1 A. Like I said, I don't remember that term,  
 2 no.  
 3 Q. So you don't remember anyone using it in  
 4 that way, correct?  
 5 A. That's correct. And this -- this -- this  
 6 that you put up, that's -- that's not me. I've  
 7 never been a part of Trinity Evangelical Theological  
 8 Seminary.  
 9 Q. Well, that would explain --  
 10 A. It's got to be a different Steven Davis.  
 11 Q. Okay. All right.  
 12 A. There's a lot of us around.  
 13 Q. I guess so. Okay.  
 14 Do you have a LinkedIn page?  
 15 A. I used to. I don't -- haven't had it for  
 16 some time.  
 17 Q. Okay. All right. Thank you for  
 18 clarifying that mystery.  
 19 MR. GANT: I think we're on Exhibit 29.  
 20 THE VIDEOGRAPHER: Pardon the  
 21 interruption.  
 22 Dr. Davis, can you tilt your camera down  
 23 just a little bit?  
 24 THE WITNESS: Sure.  
 25 THE VIDEOGRAPHER: Thank you.

Page 258

1 THE WITNESS: Is that better?  
 2 THE VIDEOGRAPHER: Yep. Thank you.  
 3 THE WITNESS: Okay.  
 4 Q. (By Mr. Gant): Do you recall who first  
 5 informed you that BCMD was going to be terminating  
 6 Dr. McRaney?  
 7 A. I didn't get a call by anyone stating they  
 8 were going to terminate him.  
 9 Q. Okay. Well, do you remember how you found  
 10 out?  
 11 A. I read it in the Baptist Press. I was  
 12 kind of -- kind of surprised, to be honest with you.  
 13 Q. Why were you surprised?  
 14 A. Just because, like I said, my role and my  
 15 responsibility was to try to help move things  
 16 forward in a positive direction, which I felt like  
 17 that's where we were going. You know, I received a  
 18 call saying that they were having a meeting that  
 19 afternoon, but they didn't tell me what the meeting  
 20 was about and so I was at the convention when I  
 21 found out the news, so --  
 22 Q. No --  
 23 A. -- that's why I was surprised.  
 24 Q. No --  
 25 A. (Inaudible.)

Page 259

1 Q. I'm sorry. I keep talking over you by  
 2 accident.  
 3 A. That's okay.  
 4 Q. Please finish.  
 5 A. No. I said I -- no one gave me any  
 6 heads-up that anybody was going to -- going to be  
 7 fired or let go.  
 8 Q. Did anyone from leadership at BCMD contact  
 9 you in May or early June 2015 and ask your opinion  
 10 about whether they should keep on Dr. McRaney?  
 11 MS. CARRINGTON: Object to the form of the  
 12 question.  
 13 A. Absolutely not.  
 14 Q. (By Mr. Gant): So BCMD didn't give you an  
 15 opportunity to express your view that the March and  
 16 April meetings had gone well and you were making  
 17 progress with Dr. McRaney and moving things in a  
 18 positive direction?  
 19 MS. CARRINGTON: Object to the form of the  
 20 question.  
 21 A. Well, I mean, they already had copies of  
 22 emails that stated that, right? So --  
 23 Q. (By Mr. Gant): They did.  
 24 A. -- no.  
 25 Q. But didn't they also have copies of emails

Page 260

1 that accused Dr. McRaney of violating the SPA and  
 2 other misconduct?  
 3 A. I don't -- I don't know about that. That  
 4 was -- that was before my time. All I'm saying is,  
 5 is I know, you know, that -- that we were moving  
 6 along in a positive direction and his officers were  
 7 aware of that.  
 8 Q. Do you remember what day you found out  
 9 that Dr. McRaney resigned?  
 10 A. It was either the day after it happened --  
 11 shortly right after it happened because it was on  
 12 Baptist Press. That's when I -- that's when I saw  
 13 it.  
 14 Q. June 8th --  
 15 A. That's when I --  
 16 Q. June 8th or 9th, does that sound about  
 17 right?  
 18 A. Sometime in June, yes. I don't know the  
 19 exact date. Whenever it showed up in Baptist Press,  
 20 that's when I read it.  
 21 MR. GANT: Let's pull Exhibit 19 back up.  
 22 THE CONCIERGE: (Complies.)  
 23 A. I'm sorry. Did you ask me a question?  
 24 Q. (By Mr. Gant): No. I asked the court  
 25 reporter staff to pull up Exhibit 19, please.

Page 261

1 A. Okay.  
 2 THE CONCIERGE: You mean Exhibit 19, sir,  
 3 not Tab 19, correct?  
 4 MR. GANT: Correct. Exhibit 19, Tab 28.  
 5 THE CONCIERGE: (Complies.)  
 6 MR. GANT: If you could scroll down to the  
 7 bottom half of the page first.  
 8 THE CONCIERGE: (Complies.)  
 9 MR. GANT: Right there.  
 10 Q. (By Mr. Gant): You wrote on June 9th: I  
 11 refigured the hundred percent plan for -- for  
 12 Maryland/Delaware based on resignation of Will  
 13 McRaney.  
 14 Do you see that?  
 15 A. I do. Yep.  
 16 MR. GANT: And then let's scroll back up  
 17 to the top -- the middle of this page.  
 18 THE CONCIERGE: (Complies.)  
 19 Q. (By Mr. Gant): You wrote also on June  
 20 10th -- not also.  
 21 On June 10th you wrote: The exec resigned  
 22 yesterday morning.  
 23 Do you see that?  
 24 A. Yes.  
 25 Q. So does that refresh your recollection

Page 262

1 about when you learned Dr. McRaney had been  
 2 terminated by BCMD?  
 3 A. Right.  
 4 Q. So you think it was June 9th?  
 5 A. Well, it had to be, yep.  
 6 Q. Okay. All right.  
 7 A. It would have been -- it would have been  
 8 in Baptist Press -- if he resigned that morning,  
 9 then it would have been in Baptist Press by late  
 10 that morning or that afternoon. And that's when I  
 11 would have learned about it.  
 12 Q. Okay.  
 13 MR. GANT: Let's go to Exhibit 29, please,  
 14 which is Tab 27.  
 15 THE CONCIERGE: (Complies.)  
 16 MR. GANT: Which is Bates-labeled NAMB 7172  
 17 through 76, but I'm only going to ask you about  
 18 the top third of the first page. But you're  
 19 welcome to look at as much as you'd like.  
 20 THE WITNESS: Okay.  
 21 (Deposition Exhibit No. 29 was marked for  
 22 identification.)  
 23 Q. (By Mr. Gant): So in the middle of the  
 24 page there's an email from you. It's unclear who  
 25 it's to. It says: Take a look at this.