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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI

Will McRaney,  
Plaintiff,

CIVIL ACTION FILE

vs.

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

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

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VIDEO DEPOSITION OF

MICHAEL DENNIS EBERT

March 1, 2023

9:35 a.m.

Suite 1900  
1170 Peachtree Street, NE  
Atlanta, Georgia

S. Julie Friedman, CCR-B-1476

Message

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**From:** Keith Evans [Keith@pathwaychurch.net]  
**Sent:** 2/8/2019 11:17:14 AM  
**To:** Ebert, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=002629aa43be4c008a4891fb39e24039-Ebert, Mike]  
**Subject:** Re: Thank you

Thank you, Mike. This is helpful.

Keith

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**From:** Ebert, Mike <mebert@namb.net>  
**Sent:** Friday, February 8, 2019 7:20 AM  
**To:** pastordalej@comcast.net  
**Cc:** Keith Evans  
**Subject:** Re: Thank you

Dear Brother Dale:

Keith Evans passed along your email regarding some of the misinformation being spread related to the lawsuit that was filed against our ministry. Because it does involve a pending lawsuit, we are limited in the information we can share.

Dr. Will McRaney filed the lawsuit against NAMB, and we have been forced to defend it. In one of its responses filed with the court, the Baptist Convention of Maryland-Delaware named NAMB as one of its supporting organizations and asserted that NAMB had been released from Dr. McRaney's claims under his severance agreement with them. This defense and NAMB's other legal defenses are limited to the facts of this specific case and do not challenge or dispute the autonomy of any church, association, or state convention, which we highly value and respect.

We have made several attempts to reach a resolution outside of the court system, and we regret that a brother in Christ has chosen to sue us. We would have preferred to settle the matter outside a secular court, but when any organization is sued based upon false and misleading allegations, it must defend itself.

Throughout this entire situation, we have continually prayed for Dr. McRaney and his family. We would appreciate it if you do the same.

If you have other questions I am happy to call or meet with you during the EC meetings in Nashville Feb. 18-19.

Blessings,





**Mike Ebert**

*Executive Director, Public Relations, Office of the President*  
North American Mission Board  
4200 North Point Pkwy.  
Alpharetta, GA 30022  
770.410.6502  
NAMB.net

**From:** Dale Jenkins <[pastordalej@comcast.net](mailto:pastordalej@comcast.net)>  
**Sent:** Wednesday, February 06, 2019 10:30 PM  
**To:** Keith Evans <[Keith@pathwaychurch.net](mailto:Keith@pathwaychurch.net)>  
**Subject:** RE: Thank you

Hi Keith,

Thanks for the note. I certainly appreciate the encouragement. I am very blessed to be part of a church that will grow and do.

Your positions with NAMB and IMB can be very good for NWBC. I've been learning what to do with the SBC-Executive Committee. I would like to ask if your aware of the law suit against NAMB and Dr. Ezell. The most recent news was the NAMB attorneys are trying to prove that NAMB has the right to control State Conventions. I'm very concerned that the Autonomy of the SBC organizations and all the way to the Churches is at risk. The keystone to Southern Baptist is the Cooperative Program. It seems like some of our leaders has lost the CP vision. How do we know the facts, how do we communicate concerns when it seems that a higher achy has an element of either self-preservation or a different view of what CP means.

I would like to sit down at some point and discuss the concerns, and what might be done or learned from all these circumstances.

Message

**From:** Ebert, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=002629AA43BE4C008A4891FB39E24039-EBERT, MIKE]  
**Sent:** 1/29/2019 2:28:06 PM  
**To:** jerry.starnes@hughes.net  
**Subject:** Re: Please Stop the Claim that NAMB is a Supporting Organization

Dear Brother Jerry:

Regarding the email you forwarded from the Reformnambnow site, it is related to an unfortunate lawsuit NAMB is currently defending. Because your concern involves a pending lawsuit, we are limited in the information we are permitted to share.

Dr. Will McRaney filed the lawsuit against NAMB, and we have been forced to defend it. Our legal defenses are limited to the facts of this specific case and do not challenge or dispute the autonomy of any church, association, or convention, which we highly value and respect.

We have made several attempts to reach a resolution outside of the court system, and we regret that a brother in Christ has chosen to sue us. We would have preferred to settle the matter outside a secular court, but when any organization is sued based upon false and misleading allegations, it must defend itself.

Throughout this entire situation, we have continually prayed for Dr. McRaney and his family. We would appreciate it if you do the same.

Blessings,



**Mike Ebert**

*Executive Director, Public Relations, Office of the President*  
North American Mission Board  
4200 North Point Pkwy.  
Alpharetta, GA 30022  
770.410.6502  
NAMB.net

**From:** jerry.starnes <jerry.starnes@hughes.net>  
**Sent:** Tuesday, January 29, 2019 1:41 PM  
**To:** Trustee <trustee@namb.net>  
**Subject:** Please Stop the Claim that NAMB is a Supporting Organization

Sent via the Samsung Galaxy S7 active, an AT&T 4G LTE smartphone

