

**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 FOR SUMMARY JUDGMENT
WITH RESPECT TO NAMB'S "SEPARATION AGREEMENT DEFENSES"**

Pursuant to Federal Rule of Civil Procedure 56(a), Plaintiff moves for summary judgment with respect to Defendant’s Defenses 4-7— the “Separation Agreement Defenses.” *See* Doc. 47; Doc. 198.¹ The grounds for entry of summary judgment in favor of Plaintiff with respect to the Separation Agreement Defenses are detailed in the accompanying memorandum.

Attached as Exhibits to this Motion is the Declaration of Scott E. Gant, dated May 18, 2023, and the exhibits to that Declaration.

May 18, 2023

Respectfully Submitted,

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¹ NAMB calls these “Defenses,” but release is an affirmative defense under the Federal Rules of Civil Procedure. *See* Fed. R. Civ. P. 8(c)(1).