

EXHIBIT Q

WILL MCRANEY vs N. AMERICAN MISSION BOARD, ET AL.
Rob Paul - 02/28/2023

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF MISSISSIPPI
3 ABERDEEN DIVISION

4 WILL MCRANEY PLAINTIFF

5 V. No. 1:17cv080-GHD-DAS

6 THE NORTH AMERICAN MISSION BOARD
7 OF THE SOUTHERN BAPTIST CONVENTION, INC. DEFENDANT

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9
10 DEPOSITION OF ROB PAUL

11 taken on February 28th, 2023,
12 commencing at approximately 1:15 p.m.
13 via Video Conference

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<p style="text-align: right;">Page 26</p> <p>1 that's normal. That's expected, if you invite somebody. 2 BY MR. VITTOR: 3 Q. What is an honorarium? 4 A. Basically, it's just compensation for their 5 participation that morning or that afternoon or that 6 evening, whatever the event is. 7 Q. And from your experience at First Baptist of 8 Louisville, typically how much would you pay a speaker 9 in honorarium? 10 A. So our practice was \$500 for a speaker and 11 cover their expenses. 12 Q. And you testified already that when you became 13 pastor at First Baptist of Louisville, you organized 14 GICs, is that correct? 15 A. Yes. 16 Q. Can you describe the process for planning a 17 GIC? 18 A. So typically a year out -- So we held ours in 19 either October or November. It varied from year to 20 year. We were still trying to find the sweet spot for 21 -- we had to plan it around hunting season. Let's just 22 be real honest. So we would finish up one GIC, we would 23 have our evaluation, and then immediately I would be 24 thinking who do I want to invite for next year. 25 Because we were trying to bring in some fairly</p>	<p style="text-align: right;">Page 27</p> <p>1 high-level talent, and those folks are not just sitting 2 around waiting for somebody to ask them. And so 3 typically we would wrap up one, and then a week later 4 I'm looking out for who I want to invite to the next 5 one. 6 Once we got those speakers in line, it might take me 7 two or three months to get those speakers lined up. But 8 we pretty much didn't do anything from, say, the end of 9 November through maybe May or June, with the exception 10 of lining up speakers. 11 Then we would begin thinking, all right, what's the 12 theme going to be for this next year, kind of 13 communicating that to our speakers so they could develop 14 their sermons based on what our theme was going to be. 15 We began thinking about what do we want to do at this 16 year's GIC? What do we want to change from what we did 17 last year? 18 We would get our volunteer teams together for who 19 was going to coordinate housing for our mission 20 partners that were coming in because they stayed in host 21 homes. So we would just kind of put together what the 22 actual event was going to look like, and then we would 23 get the graphics together and all of those things so 24 that when it was time to begin to promote that we had 25 everything in place.</p>
<p style="text-align: right;">Page 28</p> <p>1 Q. So planning a GIC is a pretty big undertaking? 2 A. Yes. 3 Q. And you said that you start -- your first 4 priority is organizing the speakers, is that right? 5 A. Yes. 6 Q. When was the first GIC that you planned as lead 7 pastor at First Baptist of Louisville? 8 A. 2014. 9 Q. So was that in November of 2014? 10 A. It was November of 2014, so I did not have that 11 full year to put together my speakers. 12 Q. You may have already told me this, but when did 13 you start at First Baptist of Louisville? 14 A. June of 2014. 15 Q. And did you start planning the November 2014 16 GIC once you started in June 2014? 17 A. Yes. 18 Q. Did Pastor Wood participate in the November 19 2014 GIC? 20 A. Yes. He was the speaker on Wednesday night. 21 Q. Do you recall what he spoke about? 22 A. Yes. He challenged our people to put their yes 23 on the table and to -- I believe that he used the -- I 24 believe that he used the passage where the disciples 25 were on the lake, and a storm came up, and Peter had to</p>	<p style="text-align: right;">Page 29</p> <p>1 get out of the boat to come to Jesus. And basically, if 2 I'm remembering correctly, the gist of the message was 3 to the church you have got to be willing to get out of 4 the boat. 5 Q. Other than his role as speaker, did Pastor Wood 6 help you plan the 2014 GIC? 7 A. He gave me full access to his missions pastor, 8 who shared with me their folder that was about yea 9 (indicating) thick. It was about an inch and a half 10 thick of documents and plans of the way to do a GIC. We 11 probably used half of that because just the complexity 12 of their GIC versus our much, much smaller version of 13 it, it wasn't necessary to do all that they did. 14 So I guess you could say he helped in the planning 15 in that way that he put me in touch with his missions 16 pastor. 17 Q. So GICs at First Baptist of Louisville are 18 smaller than GICs at Shades? 19 A. Yes because the church is much smaller. 20 Q. Approximately how big is the congregation at 21 First Baptist of Louisville? 22 A. At that time, if everybody showed up on the 23 same Sunday, we probably would have had 300 people. 24 Q. Approximately how big was the congregation at 25 Shades when you were there?</p>

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1 Q. And Dr. McRaney was a person of faith?
 2 A. Yes.
 3 Q. Was Dr. McRaney, from your vantage point,
 4 committed to spreading the gospel and doing the work of
 5 Christ?
 6 A. Yes.
 7 Q. And you said that --
 8 MR. GANT: Strike that.
 9 BY MR. GANT:
 10 Q. You mentioned that part of the material you
 11 received in a packet last week was the original
 12 complaint filed in 2017. Do you recall that?
 13 A. Yes.
 14 Q. And I think you said you asked some attorneys
 15 to read it. Did you read it yourself at the time?
 16 A. Yes.
 17 Q. So you read Dr. McRaney's original complaint
 18 around the time it was filed?
 19 A. Yes.
 20 Q. And I think you said to him shortly after it
 21 was filed on May 2nd, 2017, "I can't speak to the other
 22 issues your lawsuit raises." What did you mean by that?
 23 A. I have no firsthand knowledge of any of his
 24 other complaints.
 25 Q. The only matter about which you have firsthand

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1 something to that effect?
 2 A. Yes.
 3 Q. And, again, you don't have any firsthand
 4 knowledge about any of the issues in the case other than
 5 the 2016 GIC in Louisville, correct?
 6 A. Correct.
 7 Q. Now, again, I don't want to put words in your
 8 mouth, and maybe I'm reading between the lines, but
 9 reading your text messages, I gather that you were
 10 complaining that the original lawsuit was filed in state
 11 court in Mississippi, is that right?
 12 A. Correct.
 13 Q. And when you said earlier that the whole basis
 14 for the lawsuit is a lie, were you referring to the
 15 selection of the forum of state court in Mississippi as
 16 the lie you were referring to?
 17 A. Yes.
 18 Q. Okay.
 19 A. Well, the fact that he -- In my understanding,
 20 he had no standing in the State of Mississippi. The
 21 North American Mission Board has no standing in the
 22 State of Mississippi. So the only connection to
 23 Mississippi is his claim that I uninvited him because of
 24 the North American Mission Board putting pressure on me.
 25 Q. And we're going to talk in detail about the

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1 knowledge that was raised in Dr. McRaney's original
 2 complaint was related to the 2016 GIC at Louisville, is
 3 that right?
 4 A. Yes.
 5 Q. And so you don't know for a fact whether or not
 6 Dr. McRaney's other allegations have merit, is that
 7 right?
 8 A. I have no opinion.
 9 Q. And you made some pretty strong derogatory
 10 comments about Dr. McRaney's lawsuit. When you made
 11 those - and I'll go over them in a second as I
 12 understood them - were you referring only to the
 13 allegations concerning the 2016 GIC in Louisville when
 14 you were commenting on the complaint earlier today in
 15 the lawsuit?
 16 MR. VITTOR: Object to form.
 17 A. Could you show me specifically what comments I
 18 made that you're referencing?
 19 BY MR. GANT:
 20 Q. Sure. And again to reiterate, I'm not trying
 21 to put words in your mouth. I took notes. I'm going to
 22 do my best to get them as close to exact quotes as
 23 possible, but if I'm off, it is inadvertent, okay? So I
 24 think you said the whole basis for the lawsuit is a lie.
 25 That's what I wrote down. Do you remember saying

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1 2016 GIC in a few minutes, but when you said the whole
 2 basis for the lawsuit is a lie, I understood you to mean
 3 that the selection of Mississippi as the forum for the
 4 case as you understood it on the basis of the Louisville
 5 2016 GIC, that was what you were calling a lie, correct?
 6 A. Yes.
 7 Q. You were not commenting on any other aspect of
 8 the merits of the original lawsuit?
 9 A. Correct.
 10 Q. And, similarly, you haven't read the
 11 supplemental pleading, correct?
 12 A. I read it just a minute ago.
 13 Q. Did you read the whole thing?
 14 A. No, just the part -- the number 28.
 15 Q. So the only part of the supplemental pleading
 16 that you have read is Paragraph 28, is that correct?
 17 A. Yes.
 18 Q. And I take it that other than Paragraph 28,
 19 which as Mr. Vittor, counsel for NAMB represented to
 20 you, the only thing that refers to you or to the 2016
 21 GIC, you have no firsthand knowledge about anything else
 22 in the supplemental pleading, is that right?
 23 A. Correct.
 24 Q. And you have -- other than Paragraph 28, you
 25 have no opinion about any aspect of the merits of

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1 recollection of reaching out in any way to Dr. McRaney
 2 after you decided to uninvite him to the 2016 GIC at
 3 Louisville prior to asking him if he was going to be in
 4 St. Louis?
 5 A. Yes. I sent him a message asking him to give
 6 me a call.
 7 Q. On March 22nd, correct?
 8 A. Correct.
 9 Q. Right, so sorry if my question was unclear.
 10 After you sent that message to Dr. McRaney on March
 11 22nd, 2016, did you in any way, shape, or form reach out
 12 to him between that point and when you messaged him on
 13 June 8th, 2016, as set forth on page WM 1023?
 14 A. Not that I recall, and you can see that I did
 15 not even respond to his message to me that -- if you
 16 scroll back up on whatever date that was in May that he
 17 sent that.
 18 Q. I did see that. So he sent a message to you on
 19 May 11th, 2016, and you didn't respond to it in any way,
 20 correct?
 21 A. Correct.
 22 Q. Including asking him to give you a call,
 23 correct?
 24 A. I don't understand what you just asked me.
 25 Q. You didn't respond in any way, you said you did

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1 Q. Okay, so please explain.
 2 A. So the ministry partners are there to put a
 3 face to the mission work that we're doing, so our people
 4 are not just giving to an offering; they are giving to
 5 specific missionaries. It's an opportunity for our
 6 people to get to know the missionaries, to spend time
 7 with them, to form prayer relationships with them.
 8 So they are not there to speak. They are there to
 9 interact with our people and then to interact with us as
 10 staff as we plan future mission endeavors. There are
 11 only three speakers.
 12 Q. Was anyone from NAMB going to be in attendance?
 13 A. We had a church planter from Brooklyn who was a
 14 NAMB church planter, the Send City missionary from New
 15 York who was a NAMB employee, and another church planter
 16 with NAMB in New Orleans. Those were the three that
 17 came. We had invited the Send City missionary from New
 18 Orleans to come, but he wasn't able to come.
 19 Q. At the time you decided to uninvite
 20 Dr. McRaney, had Dr. Ezell already declined?
 21 A. At the time I decided to uninvite -- yes.
 22 Q. So you knew Kevin Ezell would not be there, but
 23 there would be other people from NAMB or connected to
 24 NAMB, and your concern was about having Dr. McRaney
 25 present at the same event, is that right?

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1 not, so I think that's clear. Thank you.
 2 When did you decide to invite Ed Litton to replace
 3 Dr. McRaney as a speaker at the 2016 GIC at Louisville?
 4 A. I believe it was -- it's in the May 2nd of 2017
 5 that I sent him -- that I sent to Will. I believe it
 6 was in April of 2016.
 7 Q. Were you worried that Dr. McRaney might find
 8 out that you had invited Ed Litton to replace him?
 9 MR. VITTOR: Object to form.
 10 A. To my knowledge, they didn't run in the same
 11 circles.
 12 BY MR. GANT:
 13 Q. So therefore you were not worried?
 14 A. No.
 15 Q. At the time you invited Ed Litton to replace
 16 Dr. McRaney as the speaker at the 2016 GIC at
 17 Louisville, you were aware that Ed Litton was a member
 18 of the NAMB board of trustees, correct?
 19 A. I think so, yes. I knew he was very involved
 20 with NAMB.
 21 Q. And you were explaining earlier that there were
 22 going to be a number of speakers at the 2016 GIC at
 23 Louisville who were in some way connected with NAMB, is
 24 that right?
 25 A. Not speakers.

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1 A. Yes.
 2 Q. Did you consider asking Dr. McRaney --
 3 explaining to him that there would be people from NAMB
 4 there and asking him if he could agree to not address or
 5 comment on his disputes with and allegations about NAMB?
 6 A. The outcome would have been the same.
 7 MR. GANT: Move to strike as nonresponsive.
 8 BY MR. GANT:
 9 Q. My question was: Did you consider that?
 10 A. I did not consider that.
 11 Q. At the time you had a discussion with Danny
 12 Wood about Dr. McRaney's potential presence at the 2016
 13 GIC at Louisville, you were aware that Danny Wood was on
 14 the NAMB board of trustees, correct?
 15 A. Correct.
 16 Q. And the conversation with Danny Wood occurred
 17 early in the morning of March 22nd, 2016, correct?
 18 A. Correct.
 19 Q. Prior to your sending a message to Dr. McRaney
 20 asking him to call you, correct?
 21 A. Correct.
 22 Q. When you had that conversation with Danny Wood
 23 on the morning of March 22nd, 2016, did he tell you that
 24 NAMB had posted a photograph of Dr. McRaney at the
 25 security desk at NAMB headquarters a month earlier?