

# EXHIBIT U

**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 JOEL BREIDENBAUGH**

I, Joel Breidenbaugh, pursuant to 28 U.S.C. § 1746 hereby declare as follows:

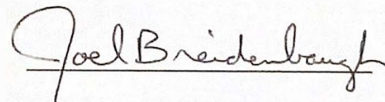
1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The evidence set out in the foregoing Declaration is based on my personal knowledge of the matters and facts set forth herein.
2. I am currently the lead pastor of the Gospel Centered Church in Apopka, Florida, which I founded in August of 2017.
3. I previously served as senior pastor of First Baptist Sweetwater in Longwood, Florida (2008-2017), and as president of the 2016 Florida Baptist Pastors' Conference (a one-year position).
4. In my capacity as president of the 2016 Florida Baptist Pastors' Conference—which took place from November 14-15, 2016—I was tasked with booking various speakers for the two-day event.
5. One of the speakers I booked for the event was Will McRaney.
6. I have been friends with Will since around 2006, when Will was a staff member with the Florida Baptist Convention and I was a church planter in Panama City Beach. Based on my interactions with Will, I viewed him as a wise intellectual who would be an effective speaker and provide useful insights on the topic of church strategy to other Baptist leaders.
7. Will and I agreed that Will would lead two break-out sessions on the morning of November 15, during which he would discuss the topic of church strategy.
8. Prior to the November 2016 Conference, during October 2016, I received a voicemail from Jimmy Scroggins, Lead Pastor of Family Church, a network of neighborhood churches in South Florida. The voicemail said: "Hey Joel, Jimmy Scroggins. Give me a buzz back when you get a chance. I just got a couple calls about Will McRaney leading some breakout at the Pastor's

Conference. I just wanted to get clarity on what you're doing with that, so I can respond appropriately. Thanks, man, see you.”

9. When I called Jimmy back, he said that Kevin Ezell—the President of NAMB—had heard that Will was scheduled to speak at the Conference and wanted me to disinvite him. Kevin was upset that I had invited Will and had reached out to Jimmy to intervene because Jimmy had nominated me to be president of the Conference that year.
10. I told Jimmy that Will was a friend of mine and I had full confidence in him as a speaker, so I was not going to disinvite him from the Conference.
11. Understanding that I was not going to disinvite Will, Jimmy wanted me to ensure that Will would not say anything negative about NAMB or Kevin Ezell during his breakout sessions.
12. I agreed to call Will and told him about the phone call from Jimmy. Will confirmed that he would not make any negative comments about NAMB or Kevin Ezell, but he was upset because this was yet another instance of Kevin interfering in Will’s professional life—now more than a year after Will’s departure from BCMD.
13. Will ultimately did speak at the Conference in November of 2016, and I received only positive feedback about his sessions.
14. I have reviewed the document bates numbered WM00967-68 in this case, and it is a true and correct copy of an email exchange between me and Will McRaney in early May 2017.

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

Executed on February 8, 2023

A handwritten signature in black ink that reads "Joel Breidenbaugh". The signature is written in a cursive style with a horizontal line underneath the name.