

EXHIBIT V

**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 AMENDED OBJECTIONS AND FIFTH SUPPLEMENTAL RESPONSES
TO DEFENDANT’S FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff hereby objects and responds to Defendant’s First Set of Interrogatories, dated February 11, 2022 (collectively, the “Interrogatories”), including the “Definitions” contained therein, as follows:

RESPONSES APPLICABLE TO ALL INTERROGATORIES

The following responses are incorporated into Plaintiff’s responses to each Interrogatory:

1. Plaintiff objects to the Interrogatories to the extent they seek or call for information not in Plaintiff’s possession, custody, or control. Plaintiff construes each Interrogatory as seeking only information in Plaintiff’s possession, custody, or control.

2. Plaintiff objects to the Interrogatories to the extent they seek or call for the production of documents or information protected from disclosure by the attorney-client privilege, the attorney work product doctrine, or any other privilege, protection, or immunity applicable under the governing law. If Plaintiff does not assert a specific privilege objection to any specific

Interrogatory, it is because Plaintiff does not understand that Interrogatory to seek privileged information. Any information disclosed in response to an Interrogatory will be disclosed without waiving, but on the contrary reserving and intending to reserve, each of these privileges, protections, or immunities. Any accidental disclosure of privileged information or material is not intended as a waiver of the applicable privilege, protection, or immunity.

3. These responses are being made after reasonable inquiry into the relevant facts, and are based only upon the information presently known to Plaintiff. Further investigation and discovery may result in the identification of additional information, and Plaintiff reserves the right to modify its responses.

4. Plaintiff objects to the Interrogatories to the extent they fail to specify an applicable time period. Plaintiff construes these Interrogatories consistent with the Court's December 7, 2022 Order (Doc. 190).

SPECIFIC OBJECTIONS AND RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1: Identify, by name and last known address and phone number, all individuals who have knowledge of relevant facts and/or discoverable information pertaining to the facts, allegations, and claims set forth in your Complaint.

RESPONSE TO INTERROGATORY NO. 1

Plaintiff objects to this Interrogatory as vague (e.g., "relevant facts"), overbroad, not proportional to the needs of the case, and calling for a legal conclusion insofar as it asks about "discoverable" information.

Without waiving the foregoing objections, Plaintiff is willing to meet and confer with Defendant about this Interrogatory.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1

Without waiving the foregoing objections, Plaintiff refers to and incorporates its Rule 26(a) disclosures, including as amended or supplemented.

INTERROGATORY NO. 2: Itemize each element, component, and/or category [“element”] of injury, loss, economic damage, and/or non-economic damage for which you seek compensation in this action and set forth the amount of compensation you seek for each such element, including in your answer the basis for the amount(s) sought.

RESPONSE TO INTERROGATORY NO. 2

Plaintiff objects to this Interrogatory as vague (e.g., “itemize” and “element”), and premature to the extent it seeks information related to expert discovery concerning damages, which will be produced in accordance with the schedule to be set by the Court.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2

Without waiving the foregoing objections, Plaintiff states the damages he seeks include damages for economic loss, damages for non-economic loss (e.g., emotional distress), punitive damages, pre-judgment interest, post-judgment interest, attorneys’ fees, and costs. The harm to Plaintiff by Defendant continued to cause damages after the filing of Plaintiff’s complaint, and damages are ongoing. The precise amount of damages sought by Plaintiff will be set forth at trial, and relevant post-trial proceedings.

INTERROGATORY NO. 3: In par. X of your Complaint beginning on page 3, you allege that 18 small SBC state conventions which were highly reliant on NAMB financial support “submitted to the combination of requests and financial strong-arming tactics of NAMB to accept the new NAMB-friendly SPA.” Identify these 18 state conventions and set forth what specific acts on the part of NAMB constituted “strong-arm tactics” that caused them to “submit.”

RESPONSE TO INTERROGATORY NO. 3

Plaintiff states: the 18 state conventions referenced were:

1. Alaska Baptist Convention
2. Arizona Southern Baptist Convention
3. Canadian National Baptist Convention
4. Colorado Baptist General Convention
5. Dakota Baptist Convention
6. Hawaii Pacific Baptist Convention
7. Baptist Convention of Iowa
8. Baptist State Convention of Michigan
9. Minnesota-Wisconsin Baptist Convention
10. Montana Southern Baptist Convention

11. Nevada Baptist Convention
12. Baptist Convention of New England
13. Baptist Convention of New York
14. Baptist Convention of Pennsylvania/South Jersey
15. Convention of Southern Baptist Churches of Puerto Rico and the Virgin Islands
16. Utah-Idaho Southern Baptist Convention
17. West Virginia Convention of Southern Baptists
18. Wyoming Southern Baptist Convention

Plaintiff objects to the remainder of this Interrogatory as a premature contention interrogatory, to which no response is required at this time.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 3

Without waiving the foregoing objections, Plaintiff further states:

Several people have communicated to me that Kevin Ezell via NAMB personnel pressured the Michigan Baptist Board and denigrated Bobby Gilstrap and said he would not be supportive of Michigan financially as long as Gilstrap remained as Executive Director. It is my understanding that NAMB's threat against Bobby Gilstrap in Michigan contributed in his termination.

Former NAMB contract worker and speaker/rep for NAMB, Brent Williams, communicated with me that Ezell had enlisted him to work around the Alaska State Executive Director to undermine him by providing church planting money to planters that did not go through the Alaska Convention as per the norm and SPA. Williams said he was remorseful and ashamed of what he did and later left Alaska because of it. Williams said he was in regular contact with Ezell, NAMB's Regional VP Steve Bass, NAMB contract worker Ed Stetzer, NAMB VP over Planting Aaron Coe, and others. He said he received NAMB Trustee approval 15 months prior and was going to be given an extra \$250,000-\$300,000 to plant church around Alaska state guys.

Several people have reported that NAMB has offered to pay the State Executive Director's salary if NAMB/Ezell would get to select their next Executive Director.

- West Virginia board members report that Ezell or his representatives offered to pay two years' salary if the West Virginia board would approve whoever Ezell put forth to fill their Executive Director vacancy.
- Ezell is reported to have paid the salary of the Ohio State Exec Director who was previously a NAMB contract worker.

Multiple State Executive directors have spoken to me and/or written about the strong-arm, bullying tactics of Ezell for them and other non-south state conventions.

- An article on these was published by SBC Today.
- About 18 state executive directors gathered and agreed that Ezell was bullying them. Six of them wrote the SBC Executive Committee and more of the state Executive Directors had a video meeting with the SBC Executive Committee to hear their individual accounts. The letter from the six state executive directors was made public.
- The former Penn/South Jersey Executive Director has told people he was so outdone in dealing with NAMB and their tactics that he left his position.

A former NAMB employee told me about and read from a document entitled "Legal Advisory, Legal Opinion Concerning Jointly Funded Missionaries." He communicated to me that Ezell used the withdrawing of health insurance from jointly funded State staff as a strategy to pressure the state conventions into accepting the new SPA NAMB had designed. The IL Baptist Association (state convention name) Executive Director Nate Adams told me of the pressure Ezell and NAMB leaders were placing on him regarding the removal of insurance. He accepted the new SPA because of the threatened health insurance money lost if he did not.

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 3

Without waiving the foregoing objections, Plaintiff further states:

In a paper “*North American Mission Board’s Strategic Shifts and the Impact on California Southern Baptist Convention*” dated January 2012 and published by the California Southern Baptist Convention (CSBC), the CSBC identified 7 actions by NAMB that concerned the CSBC leaders and impacted their work. The CSBC leaders published an article on these matters on March 1, 2012 “*Executive Board hears report on NAMB funding issues,*” <https://csbc.com/news/executive-board-hears-report-on-namb-funding-issues/>. The SBC’s Baptist Press also reported on these concerns.

A lengthy February 2021 article by journalist Joe Westbury in Baptist News Global recounts numerous examples of concerns expressed by State Executive Directors, “*State Conventions Beyond the South Question SBC North American Mission Board’s Spending and Accountability for Church Planting.*” The article discusses concerns in California, New England, Alaska, Hawaii, Ohio, New Mexico, the Northwest, Montana, and others.

On August 21, 2020, the Louisiana Baptist Message editor wrote about the published concerns of six state executive directors. <https://www.baptistmessage.com/six-state-executives-say-theres-no-partnership-in-new-namb-strategic-cooperative-agreement/>

In a letter to Alaska pastors, Alaska Executive Director Randy Covington wrote that “NAMB has lied to us time and again and not fulfilled their promises and agreements in the past,” and expressed other concerns with NAMB. *See* WM06195-98.

INTERROGATORY NO. 4: In par. XI of your Complaint beginning on page 3, you allege that certain NAMB employees, including Kevin Ezell, “wrote to various leaders within the BCMD that Plaintiff McRaney had repeatedly refused to meet with him.” Identify each specific NAMB employee who allegedly made such statement, the leaders within BCMD to whom you refer, the date of such writings, and the full content thereof.

RESPONSE TO INTERROGATORY NO. 4

Plaintiff also objects to this Interrogatory because Paragraph XI of the Complaint does not contain the quoted language.

Plaintiff also objects to this Interrogatory because it is a premature contention interrogatory, to which no response is required at this time.

Without waiving the foregoing objection, Plaintiff states: the “leaders within BCMD” referenced in Paragraph IX include Will McRaney, Tom Stolle and Bill Warren.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 4

Without waiving the foregoing objections, Plaintiff further states: Kevin Ezell wrote an email to Bill Warren and Tom Stolle on December 3, 2014, stating I had refused to meet. That was false. I had offered over numerous times to meet. I recall Warren reporting to our top leadership team and me that Ezell told him that if I “was good for six months he would meet with us.” Warren said to our leaders that in essence “Ezell was putting me on probation.”

INTERROGATORY NO. 5: In par. XI beginning on page 4 of your Complaint, you allege that the letter of cancellation between NAMB and BCMD contained “false and libelous accusations against Plaintiff McRaney.” Identify the part(s) of the referenced letter which you contend constituted false and libelous accusations and set forth what you regard to be the truth in regard to these alleged allegations.

RESPONSE TO INTERROGATORY NO. 5

Plaintiff objects to this Interrogatory because it is a premature contention interrogatory, to which no response is required at this time.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 5

Without waiving the foregoing objection, Plaintiff states the December 2, 2014 letter from NAMB terminating its Agreement with BCMD falsely asserted that Plaintiff had: engaged in “serious and persistent disregard of the Strategic Partnership Agreement between BCMD and NAMB [which] resulted in breach of the Agreement”; that Plaintiff’s “multiple failures . . . to

abide by the Agreement” led NAMB to terminate the Agreement and stop providing funds to BCMD; and that Plaintiff had “willfully and repeatedly ignor[ed] the Strategic Partnership Agreement.”

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 5

Without waiving the foregoing objections, Plaintiff further states:

NAMB’s December 2, 2014 letter had it backwards. I followed the SPA. The one matter and supposed two occurrences involved the hiring procedures for jointly funded missionaries State Director of Evangelism (SDOE) Joel Rainey and State Director of Missions (SDOM) Michael Crawford. The written SPA guidelines were followed, namely “Jointly funded missionaries must go through the approval process of both the convention and NAMB. Final approval of the candidate will be from NAMB.” I and the BCMD followed this agreed to process. As such, there was no “serious” or “persistent disregard” of the SPA by me. However, NAMB knowingly and intentionality violated the SPA. For example, while NAMB acknowledged the significance of their action, the sequence of NAMB’s notice of termination of the SPA was in violation of the SPA.

INTERROGATORY NO. 6: In par. XIII of your Complaint, you allege that “After Plaintiff McRaney’s termination in June of 2015, it was discovered that Ezell would withhold all NAMB monies to BCMD unless Plaintiff McRaney was terminated, but that those and additional funds would be forthcoming in the event of his termination and upon implementation of the new SPA by BCMD.” Identify how, when, and by whom these alleged facts were “discovered” and made known to you.

RESPONSE TO INTERROGATORY NO. 6

Plaintiff objects to this Interrogatory as seeking information not relevant to claims or defenses because it asks “how, when, and by whom these alleged facts were ‘discovered.’”

Plaintiff also objects to this Interrogatory because it is a premature contention interrogatory, to which no response is required at this time, to the extent it seeks information about Plaintiff’s contentions.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 6

Without waiving the foregoing objections, Plaintiff states he does not currently recall the details of when or how he learned this information.

INTERROGATORY NO. 7: In paragraph XIV of your Complaint, you allege that “Plaintiff McRaney was invited to speak at a large mission emphasis in Louisville, Mississippi on October 23, 2016 but was uninvited as a direct result of intentional interference by Defendant NAMB employees and/or other representatives.” Identify the NAMB “employees and/or representatives” to whom you refer, set forth the specific acts which you contend these employees and/or representatives took to get you uninvited, identify the individual(s) representing the mission emphasis who informed you that you had been uninvited to speak, and set forth your best recollection of your conversation and communications with that individual(s).

RESPONSE TO INTERROGATORY NO. 7

Plaintiff objects to this Interrogatory because it misquotes the Complaint. Plaintiff also objects to this Interrogatory because it is a premature contention interrogatory, to which no response is required at this time.

Without waiving the foregoing objection, Plaintiff states: Rob Paul informed him he was uninvited to speak.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 7

Without waiving the foregoing objections, Plaintiff further states, based on information available to date, that Plaintiff was uninvited to speak at the event after Rob Paul—who had extended the invitation to speak—spoke with then-NAMB Board of Trustees member, Danny Wood, and Wood told Paul that it “makes sense” for Paul to uninvite Plaintiff.

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 7

Without waiving the foregoing objections, Plaintiff further states:

Rob Paul had sought me out to speak at his multi-church missions conference for 2 or 3 years. I agreed to speak for him at his 2016 multi-day, multi-church missions conference. In December 2015, Paul invited me to speak in the morning worship service on Oct. 23, 2016 for

their Global Impact Celebration in Louisville, Mississippi, where he was pastoring. I confirmed with him in March 2016 to speak at his event.

Rob Paul told me in June 2016, at the SBC in St. Louis, that he had to uninvite me to speak at his conference because of NAMB. He told me he wanted to tell me in person, which he did with my wife, Sandy, present.

I later learned that Paul had a NAMB Trustee from Mississippi speaking at his conference. I also learned that months before telling me that he was uninviting me, Paul had replaced me with Ed Litton (who became the SBC President), the husband of NAMB employee Kathy Ferguson Litton.

INTERROGATORY NO. 8: In paragraph XIV of your Complaint, you allege that you used these “promotional opportunities to endorse and sell his books on mission strategy.” Identify the books to which you refer, including the title, date of publication, and publisher, and identify all similar “promotional opportunities” through which you have endorsed and sold your books, including the amount of revenue you received and expenses you incurred in connection with each such opportunity.

RESPONSE TO INTERROGATORY NO. 8

Plaintiff objects to this Interrogatory because it misquotes the Complaint. Plaintiff also objects to this Interrogatory because it is a premature contention interrogatory, to which no response is required at this time.

Without waiving the foregoing objections, Plaintiff states: he is the author of the book *The Art of Personal Evangelism: Sharing Jesus in a Changing Culture*, printed in English and Spanish in the United States, and author or contributor to other publications including *Life’s Most Important Decisions (40 Day Experience series)* and *Love Your Neighbor Share Christ*.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 8

Without waiving the foregoing objections, pursuant to Federal Rule of Civil Procedure 33(d), Plaintiff refers NAMB to Plaintiff’s tax filings—e.g., WM00430, WM00491, WM00551, WM00614, WM00668, WM00731, and WM00784.

Plaintiff also refers NAMB to the expert report of Dr. D.C. Sharp. *See* Doc. 134.

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 8

Without waiving the foregoing objections, Plaintiff further states:

For the three years prior to my termination,¹ from the summer of 2012 through the summer of 2015, I had two employers: Florida Baptist Convention through Sept. 30, 2013, and then the BCMD until my termination. In those two roles, my daily job included working with churches to help them and their leaders in church life, evangelism, church growth, church planting and missions. Since I was a salaried employee, I thought it would be inappropriate for me to charge the churches paying my salary for the same services personally. This was true for the Florida Convention, where I served as a director in evangelism and church planting. This was also true in the BCMD where I served approximately 600 churches as the Lead Missional Strategist (Executive Director). So, for those time periods I had not actively pursued consulting or conference or speaking engagements for compensation, nor book sales. It was only after my termination and the need to provide for my family that I explored various ways to do so. While I was a professor at NOBTS from 1996-2007, I was more involved in research, writing, book publications, conferencing, speaking and consulting.

INTERROGATORY NO. 9: In paragraph XVI of your Complaint, you allege that “On November 15, 2015, a national SBC agency board member shared a photo he took of Dr. McRaney’s photo posted at NAMB headquarters in Alpharetta, GA.” Identify the board member to whom you refer, the manner in which such board member shared the photo, and the substance of any contemporaneous communication from such board member.

¹ The time period is based on the Court’s December 7, 2022 Order. *See* Doc. 190 at 4.

RESPONSE TO INTERROGATORY NO. 9

Plaintiff objects to this Interrogatory because “the substance of any contemporaneous communication” is vague, and also overbroad to the extent it refers to communication unrelated to the claims or defenses.

Without waiving the foregoing objection, Plaintiff states: the referenced photo was shared by board member Rick Wheeler, who had the photo on his phone, and shared the photo with Plaintiff over lunch in Clearwater, Florida, in or around November 2016. Mr. Wheeler later forwarded by text a copy of the photo.

Although the portion of the Interrogatory referencing “the substance of any contemporaneous communication” is vague, Plaintiff will answer any specific questions about his communications with Mr. Wheeler during the deposition of Plaintiff, if any is requested by NAMB.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 9

Without waiving the foregoing objections, Plaintiff further states:

Around the gathering of hundreds of pastors and other church leaders at the annual Florida Baptist Convention in November 2016, in Clearwater, FL, my wife Sandy and I had lunch with Dr. Rick Wheeler at a restaurant away from the Convention site. At some point during our time together Rick said that Sandy and I looked like we were in good moods so we could handle what he wanted to show me. After which he pulled out his phone and showed me a photo of myself pasted or taped up on a desk. He then asked, do you know where I took this photo of you. I replied, “no.” He said it was on the reception desk at NAMB. He said he was there attending a meeting and serving as a greeter for a meeting NAMB was hosting for Associational Directors of Missions from across the country. I recall him conveying he found the posting of my photo by

NAMB strange and decided to take a photo of my picture at the reception desk. Rick was at the time serving as a member of the board for the SBC Executive Committee.

INTERROGATORY NO. 10: In paragraph XVI of your Complaint, you allege that you were the “victim of Dr. Ezell’s intentional, repeated, and widely damaging actions.” Set forth and fully describe each specific action which was done by Dr. Ezell that allegedly caused you damage, including in your answer the nature or substance of each action, the date of each such action, the identities of the individuals with whom he interfaced as a part of his “damaging actions,” and the damage you claim to have sustained as a result of each specific action.

RESPONSE TO INTERROGATORY NO. 10

Plaintiff objects to this Interrogatory because it is a premature contention interrogatory, to which no response is required at this time, and also premature to the extent it seeks information related to expert discovery concerning damages, which will be produced in accordance with the schedule to be set by the Court.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 10

Without waiving the foregoing objections, Plaintiff states the damages he seeks include damages for economic loss, damages for non-economic loss (e.g., emotional distress), punitive damages, pre-judgment interest, post-judgment interest, attorneys’ fees, and costs. The harm to Plaintiff by Defendant continued to cause damages after the filing of Plaintiff’s complaint, and damages are ongoing. The precise amount of damages sought by Plaintiff will be set forth at trial, and relevant post-trial proceedings.

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 10

Without waiving the foregoing objections, Plaintiff further states:

Numerous harmful actions by Kevin Ezell are described in Plaintiff’s Supplemental Pleading, which is incorporated into this response. *See* Doc. 191. Plaintiff also incorporates here his responses to Interrogatories 9, 11 and 12.

Plaintiff continues to learn about other harmful actions by Ezell, including disparaging remarks made by Ezell to Russell Moore, among them calling Plaintiff a “nutcase” in a February 2016 email. *See* ERLC 00015.

THIRD SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 10

Without waiving the foregoing objections, Plaintiff further states that additional examples of harmful actions by Dr. Ezell include:

Disseminating a document which disparaged Plaintiff, including asserting Plaintiff’s “[f]ailure to follow a Partnership Process in Hiring Jointly Funded Missionaries,” “[d]isregard for National Agreements,” “complete lack of cooperation with NAMB’s local initiatives,” and “disregard for NAMB staff.” *See* NAMB 6744-45; *see, e.g.*, NAMB 6756-58; 6772.

Kevin Ezell defamed Plaintiff, describing him as a threat to the safety or physical well-being of Kevin Ezell or others at NAMB.

Defaming Plaintiff by asserting that Plaintiff told lies. *See, e.g.*, NAMB 008240; NAMB 008242; NAMB 008685; NAMB 009459.

Defaming Plaintiff by asserting that all of Plaintiff’s assertions were untrue and made up. *See, e.g.*, NAMB 009188.

Defaming Plaintiff by asserting that Plaintiff’s videos posted online were “90% bull,” meaning false. *See, e.g.*, NAMB 009181.

Defaming Plaintiff by telling BCMD’s Bill Warren that Plaintiff had “disregard for NAMB staff,” “disregarded NAMB processes,” and added percentages fees to planters. *See, e.g.*, WM00831a.

Defaming Plaintiff by asserting that Plaintiff “is a liar” and “has no integrity.” *See, e.g.*, NAMB 5381.

Plaintiff also incorporates here his responses to Interrogatories 11 and 12.

INTERROGATORY NO. 11: In paragraph XVI of your Complaint, you allege “[t]his photo has caused additional damage and is a result of Dr. Ezell’s defamation.” Set forth and fully describe the “additional damage” the photo has caused, as well as each defamatory statement made about you by Dr. Ezell, including in your answer the content of each defamatory statement, the date of publication of each defamatory statement, the form and mode of each publication (*i.e.*, letter, e-mail, press release, internet post, etc.), and the individuals to whom each defamatory statement was published.

RESPONSE TO INTERROGATORY NO. 11

Plaintiff objects to this Interrogatory because it is a premature contention interrogatory, to which no response is required at this time, and also premature to the extent it seeks information related to expert discovery concerning damages, which will be produced in accordance with the schedule to be set by the Court.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 11

Without waiving the foregoing objection, Plaintiff states, the conduct referenced in this Interrogatory was one part of NAMB’s conduct impeding Plaintiff’s sequent professional opportunities—actions which were intentional, undertaken with actual malice and bad intent and oppressively, and which harmed and continues to harm Plaintiff. The precise amount of damages sought by Plaintiff will be set forth at trial.

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 11

Without waiving the foregoing objections, Plaintiff cites, as an example, the unprecedented step of posting a photo of Plaintiff at the reception desk of NAMB’s headquarters, for the purpose of denying him entry to the building. This no-entry-photo, in the lobby of NAMB’s building, was visible to NAMB personnel and visitors, and was kept posted at the reception desk for many months in 2016, and perhaps longer. The no-entry-photo of Plaintiff was posted by NAMB at the direction of its President, Kevin Ezell—and damaged Plaintiff’s reputation and professional opportunities.

Plaintiff also refers NAMB to the expert report of Dr. D.C. Sharp. *See* Doc. 134.

THIRD SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 11

Without waiving the foregoing objections, Plaintiff further states:

Numerous defamatory statements by Kevin Ezell are described in Plaintiff's Supplemental Pleading, which is incorporated into this response. *See* Doc. 191.

Other defamatory statements include each time that Ezell stated that I had violated the SPA, or failed to perform his responsibilities at BCMD. Examples include a November 20, 2014 from Ezell to me, copying Jeff Christopherson and Carlos Ferrer, in which Ezell made false claims, among them that I had not returned a call from Kevin Marsico, that I had violated the SPA, and that I hired a SDOE without any consultation with Christopherson.

Another example: Steve Davis and/or Jeff Christopherson stating in meeting with NAMB leaders (Ezell, Davis, Christopherson and Chuck Herring) and several BCMD leaders (Bill Warren, Harold Phillips, Mark Dooley, Tom Stolle, Michael Crawford) on March 11, 2015 that they had sent me a new hiring procedure that I violated, which is what Ezell claimed I had done.

Plaintiff continues to learn about other such statements made by Ezell to Russell Moore, among them calling Plaintiff a "nutcase" in a February 2016 email. *See* ERLC 00015.

FOURTH SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 11

Without waiving the foregoing objections, Plaintiff further states:

Kevin Ezell defamed Plaintiff by disseminating a document which disparaged Plaintiff, including asserting Plaintiff's "[f]ailure to follow a Partnership Process in Hiring Jointly Funded Missionaries," "[d]isregard for National Agreements," "complete lack of cooperation with NAMB's local initiatives," and "disregard for NAMB staff." *See* NAMB 6744-45; *see, e.g.*, NAMB 6756-58; 6772.

Kevin Ezell defamed Plaintiff, describing him as a threat to the safety or physical well-being of Kevin Ezell or others at NAMB.

Kevin Ezell defamed Plaintiff, asserting that Plaintiff told lies. *See, e.g.*, NAMB 008240; NAMB 008242; NAMB 008685; NAMB 009459.

Kevin Ezell defamed Plaintiff, asserting that all of Plaintiff's assertions were untrue and made up. *See, e.g.*, NAMB 009188.

Kevin Ezell defamed Plaintiff, asserting that Plaintiff's videos posted online were "90% bull," meaning false. *See, e.g.*, NAMB 009181.

Kevin Ezell defamed Plaintiff when telling BCMD's Bill Warren that Plaintiff had "disregard for NAMB staff," "disregarded NAMB processes," and added percentages fees to planters. *See, e.g.*, WM00831a.

Kevin Ezell defamed Plaintiff, asserting that Plaintiff "is a liar" and "has no integrity." *See, e.g.*, NAMB 5381.

Plaintiff also incorporates here his responses to Interrogatories 10 and 12.

INTERROGATORY NO. 12: In Count I of your Complaint, you charge NAMB with "intentional interference with the business relationship between Plaintiff McRaney and BCMD by interfering with the contractual relationship between the two." Set forth and fully describe each specific action on the part of NAMB which constituted this "intentional interference," including in your answer the nature or substance of each action, the date of each action, and the identities of the individuals at NAMB who committed each action.

RESPONSE TO INTERROGATORY NO. 12

Plaintiff objects to this Interrogatory because it is a premature contention interrogatory, to which no response is required at this time.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 12

Without waiving the foregoing objection, Plaintiff states: NAMB made repeated, false and damaging assertions to BCMD about Plaintiff prior to Plaintiff's termination by BCMD. For

example, the December 2, 2014 letter from NAMB terminating its Agreement with BCMD falsely asserted that Plaintiff had: engaged in “serious and persistent disregard of the Strategic Partnership Agreement between BCMD and NAMB [which] resulted in breach of the Agreement”; that Plaintiff’s “multiple failures . . . to abide by the Agreement” led NAMB to terminate the Agreement and stop providing funds to BCMD; and that Plaintiff had “willfully and repeatedly ignor[ed] the Strategic Partnership Agreement.”

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 12

Without waiving the foregoing objections, Plaintiff further states:

Plaintiff’s Supplemental Pleading, which is incorporated into this response, identifies acts of intentional interference. *See* Doc. 191.

As another example, Ezell sent a threatening text message to BCMD General Mission Board member Thomas Winborn during a meeting by the GMB in February 2015, as part of the interference leading to Plaintiff’s termination by BCMD.

THIRD SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 12

Without waiving the foregoing objections, Plaintiff further states:

NAMB interfered with Plaintiff’s relationship with BCMD when Kevin Ezell falsely told BCMD’s Bill Warren in December 2104 that Plaintiff had “disregard for NAMB staff,” “disregarded NAMB processes,” and added percentages fees to planters. *See, e.g.*, WM00831a.

NAMB also interfered with Plaintiff’s relationship with BCMD when sending a document to BCMD in February 2015 which falsely asserted Plaintiff “[f]ail[ed] to follow a Partnership Process in Hiring Jointly Funded Missionaries,” had “[d]isregard for National Agreements,” a “complete lack of cooperation with NAMB’s local initiatives,” and “disregard for NAMB staff.”

See NAMB 6744-45; *see, e.g.*, NAMB 6756-58; 6772. NAMB repeated these false allegations to BCMD throughout 2015, leading up to Plaintiff's termination.

NAMB also interfered with Plaintiff's relationship with BCMD when it "put a moratorium on conversations" with Plaintiff, in or around February 2015. *See* NAMB 6752.

NAMB also interfered with Plaintiff's relationship with BCMD when Kevin Ezell falsely told Bill Warren, during February 2015, that Plaintiff "hired someone without any prior notification to NAMB" and "a few months later did it again." *See* NAMB 6777.

Plaintiff refers Defendant to the Declarations of Steve Wolverton and Clint Scott. *See* WM06179-80; WM06207-08.

INTERROGATORY NO. 13: In Count II of your Complaint, you alleged that NAMB "committed slander and/or libel by intentionally defaming Plaintiff so as to damage his reputation and character resulting in his ultimate termination." Set forth and fully describe each defamatory statement made about you by NAMB, including in your answer the content of each defamatory statement, the individuals with NAMB who published each defamatory statement, the date of publication of each defamatory statement, the form and mode of each publication (*i.e.*, letter, e-mail, press release, internet post, etc.), the individuals to whom each defamatory statement was published, and the damage you claim to have sustained as a result of each defamatory statement.

RESPONSE TO INTERROGATORY NO. 13

Plaintiff objects to this Interrogatory because it is a premature contention interrogatory, to which no response is required at this time, and also premature to the extent it seeks information related to expert discovery concerning damages, which will be produced in accordance with the schedule to be set by the Court.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 13

Without waiving the foregoing objections, Plaintiff states the damages he seeks include damages for economic loss, damages for non-economic loss (e.g., emotional distress), punitive damages, pre-judgment interest, post-judgment interest, attorneys' fees, and costs. The harm to Plaintiff by Defendant continued to cause damages after the filing of Plaintiff's complaint, and

damages are ongoing. The precise amount of damages sought by Plaintiff will be set forth at trial, and relevant post-trial proceedings.

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 13

Without waiving the foregoing objection, Plaintiff states: NAMB made repeated, false and damaging assertions to BCMD about Plaintiff prior to Plaintiff's termination by BCMD. For example, the December 2, 2014 letter from NAMB terminating its Agreement with BCMD falsely asserted that Plaintiff had: engaged in "serious and persistent disregard of the Strategic Partnership Agreement between BCMD and NAMB [which] resulted in breach of the Agreement"; that Plaintiff's "multiple failures . . . to abide by the Agreement" led NAMB to terminate the Agreement and stop providing funds to BCMD; and that Plaintiff had "willfully and repeatedly ignor[ed] the Strategic Partnership Agreement."

Plaintiff also refers NAMB to the expert report of Dr. D.C. Sharp. *See* Doc. 134.

THIRD SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 13

Without waiving the foregoing objections, Plaintiff further states:

Other defamatory statements include each time that NAMB personnel stated by Plaintiff had violated the SPA, or failed to perform his responsibilities at BCMD. Examples include a November 20, 2014 from Ezell to me, copying Jeff Christopherson and Carlos Ferrer, in which Ezell made false claims, among them that I had not returned a call from Kevin Marsico, violated the SPA, and hired a SDOE without any consultation with Christopherson.

Another example: Steve Davis and/or Jeff Christopherson stating in meeting with NAMB leaders (Ezell, Davis, Christopherson and Chuck Herring) and several BCMD leaders (Bill Warren, Harold Phillips, Mark Dooley, Tom Stolle, Michael Crawford) on March 11, 2015 that they had sent me a new hiring procedure that I violated, which is what Ezell claimed I had done.

Plaintiff continues to learn about other such statements made by Ezell to Russell Moore, among them calling Plaintiff a “nutcase” in a February 2016 email. *See* ERLC 00015.

FOURTH SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 13

Without waiving the foregoing objections, Plaintiff further states:

Plaintiff’s Supplemental Pleading, which is incorporated into this response, identifies acts of intentional interference. *See* Doc. 191.

NAMB’s Carlos Ferrer defamed Plaintiff, calling him a liar. *See* Ferrer Dep. Tr. at 45-47; NAMB 7711.

NAMB personnel defamed Plaintiff, describing him as a threat to the safety or physical well-being of Kevin Ezell or others at NAMB. *See, e.g.*, NAMB 008237-28.

NAMB personnel defamed Plaintiff by disseminating a document which disparaged Plaintiff, including asserting his “[f]ailure to follow a Partnership Process in Hiring Jointly Funded Missionaries,” “[d]isregard for National Agreements,” “complete lack of cooperation with NAMB’s local initiatives,” and “disregard for NAMB staff.” *See* NAMB 6744-45; *see, e.g.*, NAMB 6756-58; 6772.

NAMB personnel defamed Plaintiff by asserting he refused requests to meet with NAMB.

NAMB personnel defamed Plaintiff, suggesting he is greedy and/or refused to engage in discussions with NAMB to redress the impact of NAMB’s conduct through biblical reconciliation. *See, e.g.*, Wood Dep. Tr. Exh. 15; NAMB 009345; NAMB 009362; NAMB 009056; NAMB 009362; NAMB 009348; NAMB 009345; NAMB 008003.

Plaintiff also incorporates here his responses to Interrogatories 10 and 11.

INTERROGATORY NO. 14: In Count VI of your Complaint, you charge NAMB with intentional infliction of emotional distress. Set forth and fully describe the emotional distress which NAMB caused you, including in your answer the period(s) of time during which you suffered emotional distress, the symptoms of emotional distress which you manifested, the identity of all health care providers from

whom you sought or received treatment and the date(s) of each visit to each health care provider, and the amount of compensation you seek for such emotional distress.

RESPONSE TO INTERROGATORY NO. 14

Plaintiff objects to this Interrogatory because it is a premature contention interrogatory, to which no response is required at this time.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 14

Without waiving the foregoing objection, Plaintiff states, by way of example, that Plaintiff suffered from stress, anxiety, difficulty sleeping, and weight gain as result of Defendant's conduct, and consulted primary care medical professionals and a cardiologist in connection with those conditions.

The harm to Plaintiff by Defendant has continued to cause damages after the filing of Plaintiff's complaint, and damages are ongoing. The precise amount of damages sought by Plaintiff for emotional distress will be set forth at trial.

INTERROGATORY NO. 15: Set forth and fully describe the actions of NAMB that "justif[y] the imposition of punitive damages" as alleged in Count VI of your Complaint.

RESPONSE TO INTERROGATORY NO. 15

Plaintiff objects to this Interrogatory as vague, as calling for privileged information, and to the extent it seeks a legal conclusion. Plaintiff also objects to this Interrogatory because it is a premature contention interrogatory, to which no response is required at this time.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 15

Without waiving the foregoing objection, Plaintiff states, by way of example, that NAMB's actions leading to Plaintiff's termination from his position with BCMD, and NAMB's actions impeding Plaintiff's sequent professional opportunities, were intentional, were undertaken with actual malice and bad intent and oppressively, and caused harm to Plaintiff. NAMB's actions concerning Plaintiff occurred over an extended period of time, and are ongoing. Moreover, the

existence and frequency of similar conduct by NAMB supports the imposition of punitive damages in this case.

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 15

Without waiving the foregoing objections, Plaintiff further refers Defendant to Plaintiff's Supplemental Pleading (Doc. 191), Plaintiff's responses to other Interrogatories, and to the expert reports of Dr. Barry Hankins (Doc. 133) and Dr. D.C. Sharp (Doc. 134).

NAMB's failure to preserve, collect and produce relevant documents also further supports the imposition of punitive damages.

INTERROGATORY NO. 16: Identify all efforts you have made to find other employment since the termination of your employment with BCMD, including in your answer the name of all prospective employers to whom you applied, the date of your application, the position for which you applied, the individual(s) with whom you communicated regarding your application, the outcome of your application, and the amount of compensation anticipated and/or received for each applied-for position.

RESPONSE TO INTERROGATORY NO. 16

Plaintiff objects to this Interrogatory as overbroad, unduly burdensome and not proportional to the needs of the case, and to the extent it seeks information not relevant to claims or defenses.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 16

Without waiving the foregoing objections, in light of NAMB's representation that the subject of this Interrogatory is relevant to Plaintiffs' "alleged damages" (April 4, 2022 letter from counsel for NAMB to counsel for Plaintiff), Plaintiff will attempt to compile and provide a response, based on currently available information.

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 16

Without waiving the foregoing objections, in light of NAMB's representation that the subject of this Interrogatory is relevant to Plaintiffs' "alleged damages" (April 4, 2022 letter from counsel for NAMB to counsel for Plaintiff), Plaintiff provides the following response, based on

his currently recollection and information reasonably available to him, but Plaintiff expressly reserves the right to amend or supplement this response based on further recollection or review of additional information or documentation:

Although I have not catalogued or memorialized in documents all of the substantial efforts made by me, or on my behalf, to find employment since the termination of my employment with BCMD, I made inquiries with at least the following people, places and organizations:

- Liberty Baptist Seminary where I used to teach adjunctively. They use my textbook and some videos as a part of their classes. – David Wheeler
- Baptist College of Florida – Robin Jumper
- New Orleans Baptist Theological Seminary – on campus in New Orleans or at the Orlando Extension Center – Chuck Kelley
- Southwestern Baptist Theological Seminary – Paige Patterson
- Mississippi College – Wayne Vanhorn
- LifeWay – Ed Stetzer
- Palm Beach Atlantic University – Gerald Wright
- Greater Orlando Baptist Association – Tom Cheyney
- Jacksonville Baptist Association – Rick Wheeler
- First Baptist Church, Wimberley, TX – Scott Weatherford
- Olive Baptist Church, Pensacola, FL – Ted Traylor
- Church at the Cross, Orlando, FL – Clayton Cloer
- Inquiries with numerous other Pastors, State and Associational leaders
- Vanderbloemen Search Group

It is my understanding that others have made advocacy or recommended me for the following positions (and my understanding of the approximate annual compensation for that position):

- Executive Director of the South Carolina Baptist Convention
 - \$235,000/yr.
- Opening for the role of Executive Director of the Georgia Baptist Convention
 - \$300,000/yr.
- Opening for the role of Executive Director of the Kentucky Baptist Convention
 - \$240,000/yr.
- Opening for the role of Executive Director of the Mississippi Baptist Convention
 - \$225,000/yr.
- Opening for the role of Executive Director of the North Carolina Baptist Convention
 - \$250,000/yr.
- Opening for Interim Pastor and Consultant for LifeBridge Church in Windemere, FL

- \$2,500/wk
- Opening for Pastor of Emmanuel Baptist Church in Tuscaloosa, AL
 - \$160,000/yr.
- Opening for Pastor at First Baptist Church Jackson, MS
 - \$325,000
- Opening for the role of President of the New Orleans Baptist Theological Seminary
 - \$325,000
- Teaching and Leadership position with Jacksonville Baptist Theological Seminary (part-time position)
 - \$24,000
- Online adjunct professor at Liberty Baptist Seminary (per course part-time)
 - \$3,000/course
- Positions at Wheaton College
 - President of Billy Graham School of Evangelism - \$300,000
 - Endowed Chair of Evangelism – Professor - \$185,000

I am currently serving as the Pastor of The Island Chapel church in Tierra Verde, FL. I became an interim pastor in Jan. 2020 and then became the full-time pastor in October 2022.

I started the Bullock Institute (DBA Bullock Theological Institute) in 2019. We launched the Bullock Institute publicly in Feb. 2020 and then Covid hit nationally in March 2020 which lead to the ministry being placed on pause. We anticipate restarting with a beta group of students in early 2023. This position has not provided a salary to date.

INTERROGATORY NO. 17: Identify all efforts you have made to earn self-employed income since the termination of your employment with BCMD, including in your answer a full description of all work performed as an independent contractor, consultant, speaker, teacher, minister and/or author, the date(s) you performed such work, and the amount you earned for each such self-employment opportunity.

RESPONSE TO INTERROGATORY NO. 17

Plaintiff objects to this Interrogatory as overbroad, unduly burdensome and not proportional to the needs of the case, and to the extent it seeks information not relevant to claims or defenses.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 17

Without waiving the foregoing objections, in light of NAMB's representation that the subject of this Interrogatory is relevant to Plaintiffs' "alleged damages" (April 4, 2022 letter from

counsel for NAMB to counsel for Plaintiff), Plaintiff will attempt to compile and provide a response, based on currently available information.

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 17

Without waiving the foregoing objections, in light of NAMB's representation that the subject of this Interrogatory is relevant to Plaintiffs' "alleged damages" (April 4, 2022 letter from counsel for NAMB to counsel for Plaintiff), Plaintiff provides the following response, based on his currently recollection and information reasonably available to him, but Plaintiff expressly reserves the right to amend or supplement this response based on further recollection or review of additional information or documentation:

Although I have not catalogued or memorialized in documents all of the substantial efforts made by me, or on my behalf, to earn self-employment income since the termination of my employment with BCMD, my pursuit of potential opportunities include:

- I started the Church Strengthening Network in the 4th quarter of 2016. From this ministry I served The Island Chapel as their contracted interim pastor from Jan. 2020 until Sept. 30, 2020. The Church Strengthening Network was paid approximately \$2,000 per week for me to provide services and cover all my related expenses for that 9-month contract period. Prior I did a few speaking engagements and a several month consulting contract with FBC Sweetwater through the Church Strengthening Network.
- Paid for the development of a website, business cards, etc. for the Church Strengthen Network and the Bullock Institute.
- Developed and submitted two book proposals to LifeWay, an SBC entity: (1) church evangelism (2) fundamental questions of church. Neither was accepted despite of the success of my previous book with them.
- Attended various SBC conferences and denominational events: SBC annual meeting, FL Baptist Convention, Assn. meetings and training events
- Participated in conferences such as Renovate and Exponential in Orlando FL
- Made appointments to meet with pastors one on one
- Made contacts to return to teaching online with Liberty Seminary
- Made contacts with NOBTS to teach in Orlando
- Met individually with denominational leaders
- Made countless calls
- Did research on evangelism and church planting in the SBC
- Wrote numerous articles

- Designed and led conferences/training
- Designed online conference/training schedule
- Started the Bullock Institute (see #16 above)

Others include:

- Renovate Conference 2015 – Conference leader then later not invited back to speak several additional years because of the concerns of repercussions with NAMB according to the Renovate founder, Tom Cheyney. Mr. Cheyney told me that Kevin Ezell described me as “delusional.”
- Extensive consulting with FBC Sweetwater FL – \$15,390
- Rewiring the American Church conference – est. \$300
- FBC Sylacauga - Personal evangelism sermon and afternoon training - \$1,500
- NOBTS teaching
 - Supervised Ministry 1 (personal evangelism course) \$800
 - Supervised Ministry 2 (pastoral ministries course) \$800
- FL Baptist Convention Pastor’s Conference - \$200
- Antioch Project – Immerse Degree Training in New Mexico
- Missions/Evangelism with FBC Delaware – Clint Scott
- Occasional supply preaching
- Interim Pastor - \$2,000/week gross payment to the Church Strengthening Network from Jan. 2020 through Sept. 2020 to the ministry from which I was paid a portion of that compensation from The Island Chapel.
- Electronic Caregiver – typically \$1,500/mo. starting in August 2017 for about 12 months - electronic home health care company

INTERROGATORY NO. 18: Identify every expert witness who you expect to call at the trial of this matter and identify the specific field or specialty and/or sub-fields or sub-specialties in which you will tender the witness as an expert.

RESPONSE TO INTERROGATORY NO. 18

Plaintiff objects to this Interrogatory as premature. Expert disclosures will be produced in accordance with the schedule to be set by the Court and the Federal Rules of Civil Procedure.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 18

Plaintiff refers Defendant to the expert reports of Dr. Barry Hankins (Doc. 133) and Dr. D.C. Sharp (Doc. 134).

INTERROGATORY NO. 19: For each expert identified in your response to the preceding interrogatory, describe in full detail the subject matter upon which the expert is expected to testify, the substance of the facts and opinions to which the expert is expected to testify, and a summary of the grounds for each opinion.

RESPONSE TO INTERROGATORY NO. 19

Plaintiff objects to this Interrogatory as premature. Any report will be produced in accordance with the schedule to be set by the Court and the Federal Rules of Civil Procedure.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 19

Plaintiff refers Defendant to the expert reports of Dr. Barry Hankins (Doc. 133) and Dr. D.C. Sharp (Doc. 134).

INTERROGATORY NO. 20: Identify all individuals who you will call at the trial in this cause.

RESPONSE TO INTERROGATORY NO. 20

Plaintiff objects to this Interrogatory as premature. Identification of trial witnesses will be made in accordance with the schedule to be set by the Court and the Federal Rules of Civil Procedure.

INTERROGATORY NO. 21: If you contend that any employee, officer, agent, and/or representative of Defendant made any pertinent verbal “admission(s)” or “statement(s) against interest” (as defined by the Federal Rules of Evidence), set forth the content of the admission, the date it was made, and identify all individuals who heard or witnessed the admission.

RESPONSE TO INTERROGATORY NO. 21

Plaintiff objects to this Interrogatory as premature, to the extent it seeks privileged information, and to the extent it seeks to impose obligations beyond those established by the Court or the Federal Rules of Civil Procedure.

INTERROGATORY NO. 22: Identify your association with the following websites or the individual(s) operating such websites, including any ownership interest you have in such, and websites: <https://reformnambnow.org/>, <https://www.gofundme.com/f/help-McRaneys-seek-justice>, <https://www.gopetition.com/petitions/namb-forensic-audit-sbc-transparency-of-mission-gifts.html>, <https://sbctransparency.com/>, <https://capstonereport.com/>, and <https://nambwhistleblower.wordpress.com/>.

RESPONSE TO INTERROGATORY NO. 22

Plaintiff objects to this Interrogatory as vague (e.g., “your association with the following websites”), compound, overbroad, not proportional to the needs of the case, and seeking information not relevant to claims or defenses.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 22

Without waiving the foregoing objections, Plaintiff states: the URL <https://www.gofundme.com/f/help-McRaneys-seek-justice> directs a user to a GoFundMe page created and maintained by Plaintiff.

The content linked to the other URLs listed in this Interrogatory is not maintained by Plaintiff, and Plaintiff has no “ownership interest” in those “websites.”

INTERROGATORY NO. 23: If not otherwise set forth in your responses to Defendants’ First Request for Production of Documents and Tangible Things to Plaintiff below, identify all documents you have withheld from production in responding to Defendants’ discovery requests, including but not limited to itemizing the type of document, date, author, recipients, title of document, and description of subject matter; state the grounds upon which such documents are withheld; and identify the present custodian of the withheld documents. Alternatively, produce an appropriate privilege log containing such information.

RESPONSE TO INTERROGATORY NO. 23

Plaintiff will comply with his obligation with respect to a privilege log, and objects to the extent this Interrogatory seeks to impose any additional obligation on Plaintiff.

March 3, 2023

Respectfully Submitted,

Scott E. Gant

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