

# EXHIBIT I

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF MISSISSIPPI

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

4 Will McRaney,  
5 Plaintiff,

6 v.

7 The North American Mission  
8 Board of the Southern Baptist  
9 Convention, Inc.,  
Defendant.

\_\_\_\_\_ /

10  
11 VOLUME I (Pages 1-165)  
12

VIRTUAL ZOOM

13 DEPOSITION OF: STEVE DAVIS  
14 DATE: February 9, 2023  
15 TIME: 8:33 a.m. - 12:04 p.m.  
16 TAKEN BY: Plaintiff  
17 PLACE: Virtual Zoom  
18 REPORTED BY: SUSAN WINTER, CSR, RPR  
Notary Public, State of Florida

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23  
24  
25

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1 the northeast region at NAMB, how many times a year  
 2 would you estimate you were at NAMB headquarters?  
 3 A. Probably four times a year.  
 4 Q. Do you remember on any of those occasions  
 5 seeing posted at the reception desk at NAMB a  
 6 picture of Dr. McRaney?  
 7 A. Yes.  
 8 Q. When do you recall seeing it?  
 9 A. I'm not sure of the date. I just -- I  
 10 just remember seeing the picture. It was during --  
 11 it was one of our meetings, I do know that. Because  
 12 otherwise I wouldn't have been there.  
 13 Q. Do you remember what year that was?  
 14 A. I do not.  
 15 MR. GANT: Let's bring up Tab 7, please.  
 16 THE CONCIERGE: (Complies.)  
 17 Q. (By Mr. Gant): Before you saw a photo of  
 18 Dr. McRaney at the NAMB reception desk, were you  
 19 aware it had been posted by NAMB?  
 20 A. I don't remember if I heard about it  
 21 before or after.  
 22 MR. GANT: Can you shrink this just so we  
 23 can see the photo?  
 24 THE CONCIERGE: (Complies.)  
 25 Q. (By Mr. Gant): Do you recognize that as a

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1 photo of Dr. McRaney?  
 2 A. Yes.  
 3 Q. And when you saw the photo of Dr. McRaney,  
 4 had you already met him in person? Sorry. Let me  
 5 be clearer. Strike that.  
 6 When you saw the photo of Dr. McRaney  
 7 posted at the reception desk at NAMB headquarters,  
 8 had you already met Dr. McRaney in person?  
 9 A. Well, yeah, of course.  
 10 Q. Okay. So you knew what he looks like?  
 11 A. Yes.  
 12 Q. And that's how you recognized that it was  
 13 his photo that was posted at the NAMB reception  
 14 desk?  
 15 A. Sure.  
 16 Q. But you're not sure whether you knew it  
 17 was posted before you saw it there, correct?  
 18 A. That's correct. It was --  
 19 Q. Okay. Do you remember --  
 20 A. It was posted on the backside of the  
 21 receptionist's desk. So anybody walking into the  
 22 building wouldn't see it. You would only see it if  
 23 you're walking out.  
 24 Q. But anyone who was walking out could see  
 25 the photo, correct?

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1 MS. CARRINGTON: Object to the form of the  
 2 question.  
 3 But you can answer.  
 4 A. Well, I saw it, yes.  
 5 Q. (By Mr. Gant): Okay. It was not hidden  
 6 at the desk, correct?  
 7 MS. CARRINGTON: Object to the form of the  
 8 question.  
 9 A. Well, like I said, it was posted  
 10 like -- like here's your -- here's your -- the  
 11 receptionist's computer (indicating). Okay?  
 12 Q. (By Mr. Gant): Uh-huh.  
 13 A. There's a countertop. And she's got a  
 14 little wall and it was posted on the wall there by  
 15 her computer.  
 16 Q. When you saw the photo of Dr. McRaney at  
 17 the NAMB reception desk when you were exiting the  
 18 building, were you specifically going over to the  
 19 reception desk for some purpose?  
 20 A. No. No.  
 21 Q. So you were exiting the building and  
 22 just passing by the receptionist desk, but not  
 23 intentionally going to the desk, correct?  
 24 A. That's correct.  
 25 Q. Did you, subsequent to seeing Dr. McRaney's

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1 photograph posted at the NAMB's reception desk, speak  
 2 with anyone about it?  
 3 A. I don't recall. I might have said  
 4 something to somebody I was going to lunch with.  
 5 Q. Do you remember asking anyone about the  
 6 circumstances of it being put up?  
 7 A. No. Because I think -- I think Kevin had  
 8 told us that he posted -- had posted a picture down  
 9 there for the receptionist to make sure that if he  
 10 came to the building, not to let him in.  
 11 Q. When did Kevin tell you that?  
 12 A. I don't recall when. It was just sometime  
 13 during our meeting.  
 14 Q. Was it -- do you remember what meeting it  
 15 was that Kevin said that?  
 16 A. No. It would have been probably just  
 17 with -- with vice presidents and him, the three of  
 18 us and him.  
 19 Q. Do you remember what month or year that  
 20 meeting was?  
 21 A. Again, I don't. I don't recall if it was  
 22 in the fall or in the next year in January. I  
 23 don't -- I don't recall. It would just be at one of  
 24 our meetings when we were there at NAMB, but I don't  
 25 recall the date. I'm sorry.

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1 Q. And -- no. No apologies necessary.  
 2 You're doing your best, which I appreciate. That's  
 3 all I can ask of you.  
 4 The -- you said you were at the NAMB  
 5 headquarters for a meeting when you saw the photo of  
 6 Dr. McRaney. Do you remember what the meeting was?  
 7 A. It would have just been one of our  
 8 quarterly-type meetings when we bring in the NAMB  
 9 missionary staff.  
 10 Q. Who attends those meetings generally?  
 11 A. Well, it kind of depends. You know,  
 12 sometimes there's certain -- a couple of times  
 13 during the year when they bring everybody in. Then  
 14 there are other times when it's just the vice  
 15 presidents come in from the region to meet.  
 16 Q. And you don't remember which of those  
 17 types of meeting it was that brought you to the --  
 18 A. No.  
 19 Q. -- to the building that day?  
 20 A. No. I'm sorry. I don't.  
 21 Q. Okay. If it's the larger meeting, roughly  
 22 how many people typically attend?  
 23 A. Gosh. I don't know. Maybe 60 or 70  
 24 people probably. I don't -- I'm not too sure.  
 25 Q. Okay. The lobby at NAMB where the

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1 reception desk is located and the photo of  
 2 Dr. McRaney was posted, that's not a private lobby  
 3 just for NAMB personnel, is it?  
 4 A. No. I mean --  
 5 Q. When someone comes to visit NAMB, guests  
 6 from outside the organization or anybody else,  
 7 that's the same lobby they enter where you saw  
 8 Dr. McRaney's photo posted at the desk, correct?  
 9 A. That's correct.  
 10 Q. And as I understand it, that desk at the  
 11 time was a circular desk in the lobby, correct?  
 12 A. Right.  
 13 Q. So that people could walk freely around  
 14 the entire 360-degree perimeter of the desk,  
 15 correct?  
 16 A. That's correct.  
 17 Q. So anyone in the lobby, if they wanted to,  
 18 or passed by the desk could have potentially seen  
 19 the photograph, correct?  
 20 MS. CARRINGTON: Object to the form of the  
 21 question; calls for speculation.  
 22 You can answer.  
 23 A. Well, they wouldn't see it from the front.  
 24 But if they walked around to the backside, yes, they  
 25 would see it.

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1 Q. (By Mr. Gant): And anyone that was in the  
 2 lobby could have done that, correct?  
 3 A. Right.  
 4 Q. When Kevin Ezell described the -- the  
 5 purpose of the posting of the photograph, to not let  
 6 Dr. McRaney in the building, do you remember anyone  
 7 else asking any questions or commenting on it?  
 8 A. No.  
 9 Q. Do you remember your reaction, if any, to  
 10 hearing that statement by Kevin Ezell?  
 11 A. It was just a statement of information.  
 12 That was it, so...  
 13 Q. Do you have any knowledge about when the  
 14 photograph was first posted in the lobby at the NAMB  
 15 reception desk?  
 16 A. No.  
 17 Q. Do you --  
 18 A. I don't.  
 19 Q. I'm sorry.  
 20 Do you have any firsthand knowledge about  
 21 how long the photograph was up?  
 22 A. I don't recall. I don't remember.  
 23 Q. During your interactions with Dr. McRaney,  
 24 did you fear for your physical safety at any point  
 25 in time?

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1 A. Me? No.  
 2 Q. Yes.  
 3 A. No.  
 4 Q. Did you fear for the safety of anyone else  
 5 around you when you were with Dr. McRaney?  
 6 A. No. Our -- our conversations, you know,  
 7 were always positive, congenial.  
 8 Q. Did you ever hear Dr. McRaney make a  
 9 physical threat against anybody during the times you  
 10 were in his presence?  
 11 A. No.  
 12 Q. Have you ever --  
 13 A. No.  
 14 Q. Have -- have you ever heard Dr. McRaney  
 15 make a physical threat of any kind against anybody?  
 16 A. No.  
 17 Q. Has anyone ever told you that Dr. McRaney  
 18 has actually made a physical threat to harm anybody?  
 19 A. No.  
 20 Q. You personally did not consider  
 21 Dr. McRaney a threat to the health or safety of  
 22 anybody at NAMB, correct?  
 23 A. I can't speak to that. All I can say is  
 24 that I don't -- I don't feel any threat to my safety  
 25 by him.

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1 Q. But my -- my question was: Did you  
 2 consider him a threat to the health or safety of  
 3 anybody at NAMB?  
 4 A. Not really, no.  
 5 Q. Let's move on to an exhibit.  
 6 THE CONCIERGE: Counselor, are you going  
 7 to mark Tab 7 as the next exhibit?  
 8 MR. GANT: Yes, please. I'm sorry.  
 9 I -- I said earlier unless I specify otherwise  
 10 I'm going to mark everything I bring up as an  
 11 exhibit.  
 12 THE CONCIERGE: Understood.  
 13 MR. GANT: Thank you.  
 14 (Deposition Exhibit No. 3 was marked for  
 15 identification.)  
 16 MR. GANT: Let's bring up Tab 32, please.  
 17 THE CONCIERGE: (Complies.)  
 18 MR. GANT: While we're waiting for it to  
 19 be brought up, for the record, Tab -- Exhibit 4  
 20 will be Bates-labeled NAMB 7401 through 7408,  
 21 but I'm only going to ask about the first page.  
 22 If you could make it just a little smaller  
 23 just so we can see what the top part is a  
 24 response to.  
 25 THE CONCIERGE: (Complies.)

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1 (Deposition Exhibit No. 4 was marked for  
 2 identification.)  
 3 Q. (By Mr. Gant): Dr. Davis, if at any point  
 4 you want to slow down or look at more of an exhibit  
 5 that I put in front of you, please let me know. But  
 6 just for expedience I'm going to get to the parts I  
 7 want to ask you about. But obviously you can look  
 8 more closely or longer at anything you'd like. Just  
 9 let me know if you'd like to do so.  
 10 So the -- the bottom of the first page is  
 11 an email from Kevin Marsico to Kevin Ezell,  
 12 yourself, Jeff Christopherson.  
 13 Do you see that?  
 14 A. Yes.  
 15 Q. Okay. And it's entitled Forward  
 16 Dr. McRaney's Termination from the BCMD M.D.  
 17 Do you see that as the subject line?  
 18 A. Yes, I do.  
 19 Q. Okay. And then in response to that right  
 20 above Kevin Ezell wrote: Geeeshh. Do you see that?  
 21 A. Yes.  
 22 Q. Okay. And then there's a response; that's  
 23 from you, correct?  
 24 A. It has my name on it, yeah.  
 25 Q. Your email at NAMB was sdavis@namb.net,

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1 correct?  
 2 A. Yes.  
 3 Q. Okay. And you responded to Kevin Ezell  
 4 saying, I'm supposed to speak at their convention  
 5 meeting. Will NAMB supply a bodyguard?  
 6 Do you see that?  
 7 A. I do.  
 8 Q. And was that a serious question or was  
 9 that a joke?  
 10 A. I think it was probably a joke because I  
 11 don't even remember saying that -- even asking that.  
 12 Q. And you think it's a joke because of what  
 13 you said a few moments ago, that you did not  
 14 consider Dr. McRaney a threat to -- to you or anyone  
 15 else at NAMB, correct?  
 16 A. Right.  
 17 Q. Okay. And then Kevin Ezell wrote: I'm  
 18 serious. Do you see that?  
 19 A. I do.  
 20 Q. And you wrote: Me too, correct?  
 21 A. That's what it looks like.  
 22 Q. Okay.  
 23 A. Okay.  
 24 Q. Your testimony today is that from your  
 25 perspective that was a joke, correct?

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1 A. Well, I mean, looking at -- maybe it  
 2 wasn't looking at the -- at the note. I don't know.  
 3 MS. CARRINGTON: I'd object to this  
 4 witness not being able to be afforded an  
 5 opportunity to see the remainder of the  
 6 document to inform whether or not he was or was  
 7 not serious in these questions. I would ask  
 8 that you give him the opportunity to read those  
 9 emails.  
 10 MR. GANT: I was -- I was very clear in  
 11 giving him the opportunity to look as much as  
 12 he'd like. I can tell you that the underlying  
 13 email doesn't have anything to do with it.  
 14 Q. (By Mr. Gant): But would you like to  
 15 scroll through the whole thing, Dr. Davis?  
 16 A. That might help, yeah.  
 17 Q. Okay. Go ahead. Please instruct the  
 18 court reporting staff to guide you through the  
 19 document. Take as much time as you'd like.  
 20 MR. GANT: Stop right there, please.  
 21 Q. (By Mr. Gant): Do you know who Steve  
 22 Wolverton is?  
 23 A. I don't -- I don't recall, to be honest  
 24 with you, who he is.  
 25 Q. I'll represent to you he's a pastor at a

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1 question, the prior one. I didn't get to --  
 2 A. Yes.  
 3 MS. CARRINGTON: -- interject it.  
 4 A. Yes. But I was probably referring to  
 5 the -- the CP -- the church planting dollars at  
 6 600,000.  
 7 Q. (By Mr. Gant): But all you wrote in  
 8 response was, Yup; isn't that --  
 9 A. Right.  
 10 Q. -- the case?  
 11 A. Yes.  
 12 Q. You didn't add anything; you didn't ask  
 13 anything, correct?  
 14 A. No, sir.  
 15 Q. No, sir, meaning I'm not correct, or I am  
 16 correct that you did not add or ask anything in  
 17 response to Kevin Ezell's email?  
 18 A. No. I didn't add anything to it.  
 19 Q. And you didn't ask him anything?  
 20 A. I did not.  
 21 Q. His email to you seemed clear, correct?  
 22 MS. CARRINGTON: Object to the form of the  
 23 question.  
 24 A. As far as I can see, yes.  
 25 Q. (By Mr. Gant): And what you understood

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1 was Kevin Ezell wanted you and he to be cautious  
 2 until you knew who was replacing Dr. McRaney,  
 3 correct?  
 4 MS. CARRINGTON: Object to the form of the  
 5 question.  
 6 A. That's what it says, yes.  
 7 MR. GANT: You can put that aside. Thank  
 8 you.  
 9 Q. (By Mr. Gant): If you're asked to come  
 10 and testify at trial in this case by either side,  
 11 either by Dr. McRaney or NAMB, will you do so?  
 12 A. Sure.  
 13 Q. Okay. I appreciate that on behalf of  
 14 Dr. McRaney.  
 15 MR. GANT: Will you bring up Tab 3,  
 16 please, which will be Exhibit 30, I believe.  
 17 THE CONCIERGE: (Complies.)  
 18 MS. CARRINGTON: I'm going to object  
 19 to the -- it's a late objection, but to the  
 20 extent that you're trying to utilize the  
 21 deposition as a way to work around the subpoena  
 22 powers of the Court to be able to require this  
 23 witness to testify at trial.  
 24 MR. GANT: It's your position that a  
 25 witness can't come to trial voluntarily?

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1 MS. CARRINGTON: He can, but I've raised  
 2 my objection for the record just so that it's  
 3 noted.  
 4 MR. GANT: I don't understand the  
 5 objection, but it is noted. Okay.  
 6 Q. (By Mr. Gant): We have in front of you  
 7 what will be marked as Deposition Exhibit 30.  
 8 It's entitled Initial Disclosures of the North  
 9 American Mission Board to the Southern Baptist  
 10 Convention -- I said to -- Initial Disclosures of  
 11 the North American Mission Board of the Southern  
 12 Baptist Convention, Inc., Pursuant to Federal Rule  
 13 of Civil Procedure 26(a)(1).  
 14 (Deposition Exhibit No. 30 was marked for  
 15 identification.)  
 16 Q. (By Mr. Gant): Do you see that?  
 17 A. Yes.  
 18 Q. I will represent to you, since I presume  
 19 you're not familiar with Federal Rule of Civil  
 20 Procedure 26(a)(1), that what this is is a document  
 21 that NAMB prepared and provided to the plaintiff  
 22 in -- earlier in this case identifying, as it says  
 23 here -- you see Roman Number I: Individuals likely  
 24 to have discoverable information, along with the  
 25 subjects of that information, which NAMB may use to

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1 support its claims or defenses.  
 2 Do you see that?  
 3 A. I do.  
 4 MR. GANT: Now, if we could scroll down, I  
 5 think it's to Number 5, please.  
 6 THE CONCIERGE: (Complies.)  
 7 MR. GANT: Stop. Right there is good.  
 8 THE CONCIERGE: (Complies.)  
 9 Q. (By Mr. Gant): Okay. Do you see your  
 10 name?  
 11 A. I do.  
 12 Q. Okay. And NAMB listed you as someone, at  
 13 least when this was prepared, who they thought had  
 14 information relevant to NAMB's defenses or  
 15 plaintiff's claims.  
 16 So you see your name and then under your  
 17 name it says: NAMB vice president of convention  
 18 relations.  
 19 Do you see that?  
 20 A. I do.  
 21 Q. Was that your title at one point at NAMB?  
 22 A. Yes.  
 23 Q. When?  
 24 A. When? I can't remember when it was  
 25 changed, but when I was serving more than one

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1 convention, they changed the title to -- to one  
 2 region I mean, they changed the title to vice  
 3 president of convention relations because I was  
 4 handling three different regions.  
 5 Q. Okay. So you understand Number 5 to refer  
 6 to you; is that correct?  
 7 A. Yes.  
 8 Q. Okay. Now, Ms. Carrington will probably  
 9 be embarrassed, but under the subjects of your  
 10 potential testimony can you -- do you see what it  
 11 says?  
 12 It refers -- says: Mr. Christopher is  
 13 expected to have knowledge and then it continues on.  
 14 Do you see that?  
 15 A. Correct. Right.  
 16 Q. That's obviously not you, correct?  
 17 A. Correct.  
 18 Q. All right. So I don't know which typo  
 19 this was, whether it's intending to list you or  
 20 Mr. Christopher, but my question for you is: Do you  
 21 believe you have any information relevant to this  
 22 case as you understand it other than what you've  
 23 already conveyed during your testimony today?  
 24 A. No.  
 25 Q. Let's -- let me give you a hypothetical.

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1 I understand you're retired and this may be far from  
 2 your thoughts, but imagine you were still working  
 3 and you were looking to hire someone for a position  
 4 to work in your organization, let's say for an  
 5 executive director of a state convention or a  
 6 similarly prestigious and demanding position. So  
 7 that's your job, is to find the right person for a  
 8 position.  
 9 And let's say you were told by someone who  
 10 had worked with a given candidate that the candidate  
 11 had lied. How would that affect your evaluation of  
 12 the candidate?  
 13 MS. CARRINGTON: Object to the form of the  
 14 question.  
 15 But you can answer.  
 16 A. I wouldn't hire him.  
 17 Q. (By Mr. Gant): What if you were told by  
 18 someone who had worked with the candidate that the  
 19 candidate was delusional?  
 20 A. I mean, in anything, you'd have to  
 21 consider the source, right, whether it's a reliable  
 22 source. I mean -- and if it were true, then you  
 23 wouldn't hire someone like that.  
 24 Q. Okay. If it were true or if you trusted  
 25 the source, you wouldn't hire the candidate in that

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1 situation, correct?  
 2 A. Correct.  
 3 MS. CARRINGTON: Object to the form of the  
 4 question.  
 5 Q. (By Mr. Gant): What if you were told by  
 6 someone who had worked with the candidate, and that  
 7 source was someone that you believed was credible,  
 8 that the candidate was a nutcase; would you hire the  
 9 candidate?  
 10 MS. CARRINGTON: Same objection.  
 11 A. Again, you'd have to consider the source  
 12 whether you, you know -- I mean, we're speculating  
 13 here, right?  
 14 Q. (By Mr. Gant): It's a -- it's called a  
 15 hypothetical, so...  
 16 A. If it were true -- if it were true, then,  
 17 yes, I wouldn't want to hire somebody like that.  
 18 Q. What if you couldn't independently verify  
 19 it, but you trusted the source and the source told  
 20 you that the candidate who they had worked with was  
 21 a nutcase; would you hire the candidate?  
 22 A. I wouldn't -- I wouldn't base it just on  
 23 that.  
 24 Q. Would it help or hurt the candidate's  
 25 chances with you?

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1 A. I think it would be information I'd want  
 2 to explore for myself first. I mean, sometimes  
 3 there are people that can -- don't work out very  
 4 well in one place, but they work out great somewhere  
 5 else. So I've never written anybody off based on  
 6 just an initial, you know, evaluation by somebody.  
 7 I like to -- if I'm interested in them, I'm going to  
 8 talk to them myself personally and try to wade  
 9 through that.  
 10 Q. What if -- strike that.  
 11 What if you were told by a trusted source  
 12 who had worked with a candidate that you were  
 13 considering that the candidate had broken agreements  
 14 with partners?  
 15 MS. CARRINGTON: Object to the form of the  
 16 question; vague.  
 17 A. Well, again, you know, it's a hypothetical  
 18 kind of situation that you're describing. And --  
 19 and in my case on anything like that you just have  
 20 to find out is it -- is it really true or not, you  
 21 know. You'd have to --  
 22 Q. (By Mr. Gant): Would you agree with me  
 23 that it would not help the prospects of the  
 24 candidate that you were considering hiring if a  
 25 trusted source who had worked with the candidate

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1 told you that the candidate had broken agreements  
 2 with business partners?  
 3 A. I would say there's always two sides to  
 4 every story. And it may or may not be true. And so  
 5 I would want to talk to the other person so I get  
 6 both sides of the story before I'd make a -- make a  
 7 decision.  
 8 Q. Is that what you did with Jeff  
 9 Christopherson when he told you all these negative  
 10 things about Dr. McRaney in 2014? Did you go and  
 11 ask Dr. McRaney for his perspective?  
 12 A. No, I didn't. And it wasn't my place to  
 13 go talk to Dr. McRaney at that point.  
 14 Q. How many people have you participated in  
 15 the hiring of during your career?  
 16 A. I couldn't give you a number, but quite a  
 17 few.  
 18 Q. A dozen, more?  
 19 A. More, lots more.  
 20 Q. Over a hundred?  
 21 A. Probably, yeah.  
 22 Q. More than 200?  
 23 A. I don't know.  
 24 Q. Okay. At least a hundred, maybe --  
 25 A. When you're talking 50 years of ministry

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1 in some large churches and a convention and NAMB,  
 2 yes, quite a few.  
 3 Q. And among all those at least a hundred,  
 4 maybe more, hires that you've participated in, do  
 5 you remember ever hiring anyone that a professional  
 6 colleague had called a liar or said had lied?  
 7 A. I never had that. I never ran into that  
 8 situation personally.  
 9 Q. It's a pretty extreme accusation to call  
 10 someone a liar or say that they lie, isn't it?  
 11 MS. CARRINGTON: Object to the form of the  
 12 question.  
 13 A. Sure. Unless it's true, you know.  
 14 Q. (By Mr. Gant): Because if it is true,  
 15 it's a pretty damning characteristic and not one  
 16 that one would want to have in their organization,  
 17 correct?  
 18 MS. CARRINGTON: Object to the form of the  
 19 question.  
 20 A. Yes.  
 21 Q. (By Mr. Gant): In the hires that you've  
 22 participated in, do you remember ever hiring someone  
 23 who a professional colleague of the candidate had  
 24 called delusional?  
 25 A. Not that I recall.

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1 Q. How about a nutcase?  
 2 A. Not that I recall.  
 3 Q. How about someone who broke agreements  
 4 with business partners?  
 5 A. Not that I recall.  
 6 Q. Those are undesirable characteristics for  
 7 a candidate to work in an organization; would you  
 8 agree with me?  
 9 MS. CARRINGTON: Object to the form of the  
 10 question; also speculation; vague.  
 11 A. I would -- probably.  
 12 Q. (By Mr. Gant): Do you recall that at the  
 13 beginning of the deposition I asked if you would  
 14 give truthful and complete answers to my questions?  
 15 A. Yes.  
 16 Q. Have you done so to the best of your  
 17 ability?  
 18 A. To the best of my ability, yes.  
 19 Q. And sitting here now having gone through  
 20 our conversation, can you think any -- of any  
 21 answers that you gave me that were inaccurate or  
 22 incomplete or you think you need to change to make  
 23 accurate or complete?  
 24 A. I don't think so.  
 25 Q. Okay.

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1 MR. GANT: Let's take a few-minute break.  
 2 Let me see if I have anything else and then we  
 3 can either wrap up or Ms. Carrington may have a  
 4 few questions.  
 5 Let's go off the record, please.  
 6 MS. CARRINGTON: How much time do you want  
 7 to take, Scott?  
 8 MR. GANT: Let's go off the record.  
 9 THE VIDEOGRAPHER: We're going off the  
 10 video record. The time is 3:39.  
 11 (A brief recess was taken.)  
 12 THE VIDEOGRAPHER: We're back on the video  
 13 record. The time is 3:50.  
 14 You may proceed.  
 15 MR. GANT: Welcome back, Dr. Davis. I  
 16 just have a few more questions for now.  
 17 Q. (By Mr. Gant): I believe I saw in the  
 18 document a reference by you to a separation  
 19 agreement between BCMD and Dr. McRaney.  
 20 Sitting here today, do you know whether  
 21 there was a separation agreement between BCMD and  
 22 Dr. McRaney?  
 23 A. I have no knowledge of that, of any  
 24 specifics on that.  
 25 Q. Now, when Dr. McRaney was terminated by