

EXHIBIT L

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION

WILL McCRANEY,)
PLAINTIFF,)

v.)No. 1:17cv080-GHD-DAS

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

-----)

REMOTE PROCEEDINGS OF THE
VIDEOTAPED DEPOSITION OF WILLIAM BARKER
MONDAY, MAY 1, 2023

REPORTED BY NANCY J. MARTIN
CSR. NO. 9504, RMR, RPR

1 Q. And it's a text from you to Will; correct?
 2 A. Correct.
 3 Q. Focusing at the very top where it just says
 4 "Will" with an arrow next to it, that refers to Will
 5 McRaney; right?
 6 A. Correct.
 7 Q. And just so we're on the same page, the text
 8 in blue is from you to Dr. McRaney; right?
 9 A. Correct.
 10 Q. And the responsive text in gray is from
 11 Dr. McRaney to you; right?
 12 A. Correct.
 13 Q. At the very bottom there's a date that is cut
 14 off that appears to be November 12. Do you see that,
 15 and do you know what year that was?
 16 A. No, I do not.
 17 Q. In your text to Will you refer to "Kevin."
 18 And am I right that you're referring to Kevin Ezell?
 19 A. Correct.
 20 Q. You refer to Dr. Ezell's "evil actions."
 21 What do you mean by that?
 22 A. That's a laundry list. The actions that he
 23 took in my personal leaving of the North American
 24 Mission Board, at that time I had several friends that
 25 were calling me for counsel who were looking for

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1 positions and were experiencing an interest in -- by
 2 the organization or the church in them, and when they
 3 called them the North American Mission Board, suddenly
 4 they were out of the picture and they felt like they
 5 were being blackballed, Rob Carr being one of those at
 6 the time.
 7 And they -- and just in general, what had
 8 happened in many of our state conventions as a result
 9 of Kevin's influence, being heavy handed, one of those
 10 organizations that I worked with that had experienced
 11 the negative reaction from Kevin was the organization
 12 that worked with smaller membership churches, and he
 13 had sent us an E-mail in which he had basically said
 14 that he would put no money into nothing that he could
 15 not control.
 16 And with his personality being that of a
 17 control person, my personal opinion, and my own
 18 personal observation, he was going against who we are
 19 at Southern Baptist in the sense that we cooperate and
 20 work together. It was his way or the highway.
 21 So there's a wealth of information packed
 22 behind that statement.
 23 Q. And none of the things you just mentioned,
 24 none of the laundry list you just mentioned has
 25 anything to do with Dr. McRaney; right?

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1 MR. GANT: Objection. Vague.
 2 Mischaracterizes testimony. Foundation. Calls for a
 3 legal conclusion.
 4 MS. STONE: You can answer.
 5 THE WITNESS: It shows a precedence on the
 6 part of Kevin to treat others that way.
 7 BY MR. VITOR:
 8 Q. Do you think Dr. Ezell is evil?
 9 A. I would hate to think of him as being good.
 10 Q. Why were you praying that Dr. Ezell's evil
 11 actions would become public knowledge?
 12 A. Because his behavior is not of a Christian
 13 gentleman, and he is sitting in an agency of authority
 14 with Southern Baptist, and we do not need that type of
 15 leadership in place. We need godly men, not men who
 16 manipulate.
 17 Q. And you think Kevin is a manipulator?
 18 A. I'm sorry. I did not understand.
 19 Q. I believe you testified that "we need godly
 20 men" and "not men who manipulate," and my question was
 21 you believed Kevin is a man who manipulates?
 22 A. Absolutely.
 23 Q. Your text also says that Will is "one of
 24 several that he," Kevin, "set out to destroy and one
 25 of" the "many who have been blackballed."

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1 Do you believe that Dr. Ezell has been out to
 2 destroy Dr. McRaney?
 3 A. Yes.
 4 Q. Based on what?
 5 MR. GANT: Objection. Vague.
 6 MS. STONE: You can answer.
 7 THE WITNESS: His track record.
 8 BY MR. VITOR:
 9 Q. Whose track record? Dr. Ezell's track
 10 record?
 11 A. Yes, sir.
 12 Q. Based on anything else?
 13 A. Do you need anything else?
 14 Q. Do you think Dr. Ezell has blackballed
 15 Dr. McRaney?
 16 A. He's perfectly capable of it.
 17 Q. Right. And in addition to being capable of
 18 it, do you think he has done it?
 19 A. Based on my experience with Kevin Ezell
 20 personally, yes.
 21 Q. You don't know whether he blackballed
 22 Dr. McRaney. So you think it would be consistent with
 23 his prior actions?
 24 MR. GANT: Objection. Vague and to the
 25 extent it calls for a legal conclusion.

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1 MS. STONE: You can answer.
 2 THE WITNESS: It would be consistent with his
 3 behavior.
 4 MR. VITOR: Irene, could you introduce Tab 8
 5 as Exhibit 3, please.
 6 (Deposition Exhibit 3 was marked for
 7 identification.)
 8 MR. VITOR: For the record, this is a series
 9 of Facebook messages that Mr. Barker produced bearing
 10 Bates No. BARKER000004. It should be available on
 11 Exhibit Share.
 12 Q. Mr. Barker, can you see it, or is it still
 13 loading for you?
 14 A. I'm looking at it. I'm having to get up
 15 close so I can read the print. It's small.
 16 Q. The print is very small. You might be able
 17 to zoom in, but it is small.
 18 MR. GANT: Josh, mine hasn't loaded yet. So
 19 just give me a second.
 20 MR. VITOR: Okay. Just let me know when it's
 21 there.
 22 (Pause.)
 23 BY MR. VITOR:
 24 Q. Mr. Barker, do you recognize Exhibit 3 to be
 25 a thread of Facebook messages between you and

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1 Dr. McRaney, which you produced in response to the
 2 subpoena?
 3 A. Correct, I recognize it.
 4 Q. And like the previous document, Exhibit 2,
 5 the messages in blue are from you to Dr. McRaney;
 6 right?
 7 A. Correct.
 8 Q. Focusing on the second blue message from you
 9 to Dr. McRaney, which is dated February 4, 2020, you
 10 write that you were "praying for the upcoming court
 11 hearing in NO." Did you mean the Fifth Circuit
 12 hearing in New Orleans?
 13 A. Yes.
 14 Q. Did you attend that hearing?
 15 A. No.
 16 Q. At the bottom of that message you wrote, "I
 17 was one of the two men Kevin sent out to destroy."
 18 Again, when you refer to "Kevin," you're referring to
 19 Kevin Ezell; correct?
 20 A. Right.
 21 Q. You think he set out to destroy you?
 22 A. Yes.
 23 Q. Based on what?
 24 A. I was one of three finalists to be considered
 25 as a state executive director for the state of

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1 West Virginia. I had received permission from Steve
 2 Davis, vice president, and over that region to allow
 3 my name to be submitted. It had been requested by
 4 5 members of the 10-member committee.
 5 We had worked out a deal where West Virginia,
 6 which was financially in distress at the time, I would
 7 continue to serve the Appalachian region and serve as
 8 state executive director for two years to give them a
 9 chance to recover and was told by Ron McCoy, who was
 10 on the committee, that I was the No. 1 candidate.
 11 The other one was a young fellow named
 12 Matthew, Matt Shamblin, rather, and Matt had been
 13 serving as an interim state executive director.
 14 Then I got a phone call from Ron McCoy asking
 15 me if I was anywhere in the vicinity of Morgantown,
 16 West Virginia, Moundsville area, that he would like to
 17 meet with me, and it just so happened I was driving
 18 through that region of the state of West Virginia.
 19 I went to Moundsville. We met in the
 20 association's parking lot or the Ohio Valley Baptist
 21 Association, and he had a couple of other passengers
 22 with him, and one of those men, a guy named Bobby
 23 Thompson, I literally thought was going to physically
 24 strike me. It seems that in the committee, they had
 25 been polled -- and Ron McCoy later told me this came

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1 from Kevin. They had been told that I was not to
 2 serve as state executive director, to do whatever
 3 possible to get me and Matt Shamblin removed, that he
 4 had a friend that he wanted to serve.
 5 The way they worded the question was, "You
 6 cannot consider Bill. He has baggage." When asked
 7 what was the baggage, the response was, "It's highly
 8 confidential. We cannot talk about it."
 9 As a result of that, the committee read into
 10 it that I had been unfaithful to my wife or I had
 11 mishandled some funds on behalf of the North American
 12 Mission Board, and immediately my name was no longer
 13 being considered.
 14 You have to consider the fact that I'm a
 15 native of West Virginia, and at that particular point
 16 was the first native son to be considered as a state
 17 executive director for that state.
 18 When the report was given that I had baggage,
 19 Bobby Thompson took it that I had been unfaithful to
 20 my wife, and because he was one of the young men that
 21 I had worked with and mentored, Bobby was ready to
 22 beat me to a pulp, and, quite frankly, he could have
 23 done so. He was a former logger. I hadn't worked in
 24 the timber business before being called to -- or
 25 started in Deep Creek Baptist Church.

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1 Q. You met with Dr. McRaney about once a year?
 2 A. They would have a meeting. Sometimes it
 3 would be in Nashville, in conjunction with a meeting
 4 at Lifeway. Other times it would be in conjunction
 5 with a meeting at the North American Mission Board.
 6 But they would let me know when I was to meet
 7 with them, and I would give a report. And there would
 8 be about 15 people gathered in the room, and I would
 9 share with them a report on the work, and they would
 10 make a decision to continue the work for another year
 11 based on my report.
 12 Q. Moving down to Paragraph 3 of your
 13 declaration, Exhibit 5, it says you "had many personal
 14 interactions with Kevin Ezell." Do you see that?
 15 A. Yes, sir.
 16 Q. What do you mean by "personal interactions"?
 17 A. For some time my office was on the fifth
 18 floor, about 25 feet from his office. So I saw him
 19 quite often. I'm a heavy coffee drinker. So when I
 20 would visit the coffeepot, it's right outside of his
 21 office.
 22 Q. I think you testified before -- well, strike
 23 that.
 24 Are you friends with Dr. Ezell?
 25 A. No, sir. Speaking to someone doesn't mean

1 that you're friends.
 2 Q. Understood.
 3 What is the relevance of your personal
 4 interactions with Kevin Ezell?
 5 MS. STONE: Object to form.
 6 MR. GANT: Objection. Vague, and to the
 7 extent it calls for a legal conclusion.
 8 MS. STONE: You can answer.
 9 THE WITNESS: My interactions with him would
 10 be passing him in the hall, being in a meeting where
 11 he was presiding, or him stopping me in the hall with
 12 a comment or two.
 13 BY MR. VITOR:
 14 Q. Why include the reference to your many
 15 personal interactions with Kevin Ezell in your
 16 declaration?
 17 A. Because I was personally there.
 18 Q. For your interactions with Dr. Ezell?
 19 A. Yes, I was there. My interactions were
 20 there, or he texted me toward the end. That's
 21 referred to in this document. That was personal
 22 correspondence between the two of us.
 23 Q. What is your understanding of Kevin Ezell's
 24 involvement in Dr. McRaney's claims in this case?
 25 A. My personal understanding is that Kevin,

1 behind the scenes, manipulated it so that the board
 2 dismissed Kevin as their state executive director
 3 because Dr. McRaney did not cooperate with Kevin in
 4 what Kevin wanted to be done.
 5 Q. How do you know that?
 6 A. I talked to members of the board, with
 7 Maryland, and then conversations -- I did not learn it
 8 from Will. I learned it from the people within the
 9 Maryland/Delaware Convention.
 10 Q. And I believe you testified just a few
 11 minutes ago, with respect to your own personal
 12 interactions with Kevin Ezell, that you included them
 13 in your declaration because you were there; right?
 14 A. Because I was what?
 15 Q. That you were there. You were there,
 16 participating in your personal interactions with
 17 Dr. Ezell; right?
 18 A. Right.
 19 Q. But you weren't there for Dr. Ezell's
 20 involvement in Dr. McRaney's claims in this case;
 21 right?
 22 MR. GANT: Objection. Vague, and to the
 23 extent it calls for a legal conclusion.
 24 MS. STONE: Same objections.
 25 You can answer.

1 THE WITNESS: I talked to people that were
 2 there, and their story was consistent.
 3 BY MR. VITOR:
 4 Q. Turning to Paragraph 4 of Exhibit 5. You
 5 write that "for a period from the fall of 2012 until
 6 September 2015, I participated in NAMB's Senior
 7 Leadership meetings." Do you see that?
 8 A. That would be correct.
 9 Q. How many of these meetings, approximately,
 10 did you participate in?
 11 A. Likely about four a year.
 12 Q. Four per year or four total during those four
 13 years?
 14 A. Four per year.
 15 Q. And what was your role in those meetings?
 16 A. I was primarily there to listen and to learn
 17 and to help understand the direction on the field. I
 18 worked with church planners at any given time, about a
 19 140 to 150 young men, and by listening to what was
 20 taking place in those meetings, I was able to better
 21 relate to them and help them with clarity of the
 22 direction NAMB was taking.
 23 Q. Was Dr. Ezell in all of those meetings?
 24 A. Yes, sir. To my knowledge, if he missed one,
 25 I do not recall it.

1 emerging state conventions in Southern Baptist life
 2 for control to be exerted. There was the state
 3 conventions in the midwest and the west, and I did not
 4 talk to those state executive directors, but you could
 5 read between the lines. Knowing what's happened in
 6 the midwest states and the southeast states, you could
 7 read between the lines and know that there was
 8 pressure being exerted.
 9 Q. You're reading between the lines when you
 10 describe these other similar reports; right?
 11 A. When I describe them or I talk to individuals
 12 within the state who sat on the executive committees.
 13 Q. Bill Henard ultimately got the job of
 14 executive director in West Virginia; is that right?
 15 A. That is correct.
 16 Q. And that was the position, as a native son of
 17 West Virginia, that you wanted; right?
 18 A. That is correct.
 19 Q. And it's your belief that you did not get
 20 that job because of Dr. Ezell; right?
 21 A. Correct.
 22 Q. Do you think -- is it your belief -- is it
 23 your belief that Dr. Ezell conditioned NAMB funding on
 24 the appointment of Bill Henard in West Virginia to
 25 make it more likely that he would have threatened BCMD
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1 with funding to get Dr. McRaney fired?
 2 A. Yes, sir.
 3 Q. Do you trust NAMB?
 4 MR. GANT: Objection. Vague compound.
 5 THE WITNESS: No, sir. I have no trust with
 6 the current leadership of the North American Mission
 7 Board.
 8 MR. VITOR: I have no further questions at
 9 this time.
 10 I don't know if Scott or Julia have any
 11 questions.
 12 MR. GANT: I have a few. Do you care what
 13 order we go in?
 14 MS. STONE: I don't have any. So -- or at
 15 least right now. So, Scott, if you want to go, could
 16 we take a five-minute break before we do that?
 17 MR. GANT: Sure. Absolutely.
 18 (A recess was taken from 12:53 p.m.
 19 to 1:04 p.m.)
 20
 21 EXAMINATION
 22 BY MR. GANT:
 23 Q. Good afternoon, Mr. Barker. I know you
 24 prefer to be called Bill, but it's a hard habit to
 25 break.
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1 So thank you for your time this afternoon.
 2 As I think you know, my name is Scott Gant, and I
 3 represent Dr. McRaney in this case against NAMB. I
 4 just have a couple of questions, all of them following
 5 up on questions that were posed to you by counsel for
 6 NAMB.
 7 Do you recall earlier that you were
 8 discussing with Mr. Vitor the false allegations
 9 against you concerning your having baggage?
 10 A. Yes, sir.
 11 Q. Okay. And you mentioned two particular
 12 things, the insinuation that you had had an affair or
 13 mishandled money.
 14 Do you recall discussing that with Mr. Vitor?
 15 A. Yes, sir.
 16 Q. Are either of those allegations or
 17 insinuations made against you true?
 18 A. No.
 19 Q. You gave some testimony earlier, in response
 20 to questions from Mr. Vitor, about a photograph of
 21 Dr. McRaney that was posted at the security or
 22 reception desk at NAMB's headquarters.
 23 Do you recall that discussion with Mr. Vitor?
 24 A. Yes, sir.
 25 Q. And I think you testified that although you
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1 personally didn't see the photograph, because you
 2 didn't tend to congregate around the desk, you were
 3 aware of its presence; is that correct?
 4 A. I had been told by other employees that it
 5 was there.
 6 Q. Did anyone discuss with you why a photograph
 7 of Dr. McRaney had been posted at the security desk at
 8 NAMB?
 9 A. He was not welcome in the building.
 10 Q. And can you just remind us during what years
 11 you entered the building at NAMB for any purpose?
 12 A. 2001 through 2017.
 13 Q. And during those years, do you recall the
 14 photograph of anybody else being posted at the NAMB
 15 reception or security desk for the purpose of keeping
 16 out someone or making sure that they were not welcome?
 17 A. I do not recall anyone talking about another
 18 picture being posted.
 19 Q. So to your knowledge, the only person that
 20 was done to by NAMB was Dr. McRaney?
 21 A. That is all that I'm aware of.
 22 Q. How old are you, sir?
 23 A. 71.
 24 Q. And you testified earlier you're currently a
 25 pastor at a church; is that correct?
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1 A. Yes, sir.
 2 Q. And what church is that?
 3 A. Wolffork Baptist Church, Rabun Gap, Georgia.
 4 Q. Do you have any current plans to retire?
 5 A. No.
 6 Q. In your experience, for churches that
 7 describe themselves as Southern Baptist, is it unusual
 8 for a pastor to work into his 70's?
 9 A. Yes, sir.
 10 MR. VITOR: Object to form.
 11 You can answer.
 12 THE WITNESS: Yes, sir.
 13 BY MR. GANT:
 14 Q. It's unusual?
 15 A. It's not unusual for a pastor to work into
 16 his 70's or 80's.
 17 Q. The declaration that you submitted in this
 18 case that Mr. Vitor marked as Exhibit 5, I think you
 19 testified earlier that everything in it is true.
 20 Is that an accurate statement?
 21 A. That is accurate.
 22 Q. And having gone through the declaration with
 23 Mr. Vitor, is there anything about his questions or
 24 your answers that leads you to have any doubt about
 25 the accuracy of anything in your declaration?
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1 A. No, sir.
 2 Q. Is all the testimony that you've given today
 3 true and accurate to the best of your knowledge?
 4 A. Yes, sir.
 5 Q. And do you believe that the jury can feel
 6 confident that if it chooses to take it -- your
 7 statements into account, that the statements you've
 8 made are true?
 9 A. Yes, sir.
 10 MR. VITOR: Objection. Form.
 11 MR. GANT: Thank you for your time, sir.
 12 THE WITNESS: Thank you.
 13 MR. VITOR: I just have one or two follow-up
 14 questions on Mr. Gant's questions, Mr. Barker.
 15
 16 FURTHER EXAMINATION
 17 BY MR. VITOR:
 18 Q. You were discussing the photo that you were
 19 told was posted at NAMB headquarters. Do you remember
 20 that discussion with Mr. Gant?
 21 A. Yes, sir.
 22 Q. And I believe in connection with that
 23 discussion you testified that you would occasionally
 24 enter NAMB's headquarters between 2001 and 2017; is
 25 that right?
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1 A. Yes, sir.
 2 Q. When did you become aware that there was a
 3 photo of Dr. McRaney posted at NAMB's headquarters?
 4 A. I cannot give you an exact date. It would
 5 have been after he was terminated in Maryland.
 6 Q. So after 2015?
 7 A. It would have been after that.
 8 Q. You don't know when, or if at all, a photo
 9 was posted at NAMB's headquarters; right?
 10 MR. GANT: Objection. Mischaracterizes
 11 testimony.
 12 Go ahead, sir.
 13 MS. STONE: Same objection.
 14 THE WITNESS: I do not recall seeing the
 15 picture, but I was made aware of the picture.
 16 BY MR. VITOR:
 17 Q. And you were made aware at some point after
 18 Dr. McRaney's termination from BCMD in June of 2015;
 19 is that right?
 20 MR. GANT: Objection. Vague.
 21 THE WITNESS: I'm sorry.
 22 MR. GANT: Go ahead, sir.
 23 THE WITNESS: Yes.
 24 MR. VITOR: I have no further questions.
 25 Thank you very much for your time,
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1 Dr. Barker.
 2 THE WITNESS: Thank you very much.
 3 MR. GANT: I have no questions of Dr. Barker,
 4 but before we go off the record, just one question.
 5 The deposition notice was noticed for video,
 6 and when you're on Zoom, I can never -- of course it's
 7 being recorded is my understanding.
 8 MR. VITOR: We did not record the deposition,
 9 Scott. It's just a transcript today.
 10 MR. GANT: Okay. So that was NAMB's choice?
 11 MR. VITOR: That was NAMB's choice.
 12 MR. GANT: Okay. Okay. Thank you.
 13 Thank you again, sir.
 14 And thank you, Julia.
 15 MS. STONE: And we'll read and sign.
 16 (Witness excused.)
 17 (Deposition concluded at 1:11 p.m.)
 18
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