

# EXHIBIT M

<p style="text-align: right;">Page 1</p> <p>IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF MISSISSIPPI, ABERDEEN DIVISION</p> <p>CIVIL ACTION NO. 1:17CV080-GHD-DAS</p> <p>WILL MCRANEY, Plaintiff,</p> <p>vs.</p> <p>THE NORTH AMERICAN MISSION BOARD OF THE SOUTHERN BAPTIST CONVENTION, INC., Defendant.</p> <p>DEPOSITION OF PASTOR CHARLES MCDANIEL WOOD, JR. Butler Snow LLP 1819 Fifth Avenue North, Suite 1000 Birmingham, Alabama 35203 September 28, 2022</p> <p>REPORTED BY: Gail B. Pritchett Certified Realtime Reporter, Registered Professional Reporter and Notary Public</p>	<p style="text-align: right;">Page 3</p> <p>1           A P P E A R A N C E S (continuing)</p> <p>2</p> <p>3           OTHERS PRESENT:</p> <p>4           Ms. Victoria Scordato (via Zoom)</p> <p>5           Boies Schiller Flexner, LLP</p> <p>6</p> <p>7           Mr. George McCallum</p> <p>8           North American Mission Board</p> <p>9           General Counsel</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>
<p style="text-align: right;">Page 2</p> <p>1           A P P E A R A N C E S</p> <p>2</p> <p>3           FOR THE PLAINTIFF (via Zoom):</p> <p>4           Mr. Scott E. Gant</p> <p>5           Attorney at Law</p> <p>6           Boies Schiller Flexner, LLP</p> <p>7           1401 New York Avenue, NW</p> <p>8           Washington, D.C. 20005</p> <p>9           202.237.2727</p> <p>10          sgant@bsflp.com</p> <p>11</p> <p>12          FOR THE DEFENDANT:</p> <p>13          Ms. Kathleen Ingram Carrington</p> <p>14          Attorney at Law</p> <p>15          Butler Snow LLP</p> <p>16          150 Third Avenue South, Suite 1600</p> <p>17          Nashville, Tennessee 37201</p> <p>18          615.651.6700</p> <p>19          kat.carrington@butlersnow.com</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>	<p style="text-align: right;">Page 4</p> <p>1           INDEX OF EXAMINATION</p> <p>2           Page:</p> <p>3           EXAMINATION BY MS. CARRINGTON           9</p> <p>4           EXAMINATION BY MR. GANT                   68</p> <p>5</p> <p>6           INDEX OF PLAINTIFF'S EXHIBITS</p> <p>7           Page:</p> <p>8           Plaintiff's Exhibit 1 - Subpoena           88</p> <p>9           Plaintiff's Exhibit 2 - Danny Wood's       93</p> <p>10          Response to Subpoena to Produce</p> <p>11          Documents, Information, or Objects</p> <p>12          Plaintiff's Exhibit 3 - NAMB 5237       120</p> <p>13          Plaintiff's Exhibit 4 - Complaint       130</p> <p>14          Plaintiff's Exhibit 5 - Initial           136</p> <p>15          Disclosures</p> <p>16          Plaintiff's Exhibit 6 - Plaintiff's 2nd   142</p> <p>17          set of Requests for Production</p> <p>18          Plaintiff's Exhibit 7 - 12-14-20 letter   149</p> <p>19          to Federal Court of Appeals</p> <p>20          Plaintiff's Exhibit 8 - 12-2-14 letter,   152</p> <p>21          NAMB 0001</p> <p>22          Plaintiff's Exhibit 9 - Baptist Press   158</p> <p>23          article</p>

Page 109

1 and answered. Also vague as it relates to the  
 2 use of the term "responsive."  
 3 Subject to that, Pastor Wood, you  
 4 can answer the question.  
 5 A. Yes, I sent what was requested.  
 6 MS. CARRINGTON: Maybe I can help.  
 7 Pastor Wood, did you delete any emails that  
 8 might have involved Will McRaney after January  
 9 1st, 2017?  
 10 MR. GANT: Wait, wait, that is not  
 11 a help, don't answer. You can ask me if I  
 12 would like your help before you pose questions  
 13 to him during my examination. You will have a  
 14 turn when I am done.  
 15 MS. CARRINGTON: We are just going  
 16 in circles, Scott. I am not sure what you are  
 17 getting at here.  
 18 MR. GANT: I want to get on the  
 19 record what happened to the documents he found  
 20 from 2017 or later that were within the scope  
 21 of the subpoena. He has identified he found  
 22 some. I believe what he said is he just held  
 23 on to them and didn't give them to Butler Snow,

Page 110

1 but I can't get a straight answer.  
 2 Q. (BY MR. GANT:) So Mr. Wood, can  
 3 you just give me a straight answer so we can  
 4 move on to the next topic?  
 5 A. Yeah, it -- the scope of what I  
 6 was asked to provide, I provided. Anything  
 7 else that was found is still there on my email  
 8 on my server. I didn't delete anything. But  
 9 since there was a scope, I just went and  
 10 provided what was in the scope.  
 11 Q. And the emails from 2017 and later  
 12 were outside of the scope, is that correct?  
 13 A. Correct.  
 14 Q. Okay. Did you become aware at  
 15 some point that someone from NAMB had posted a  
 16 photograph of Dr. McRaney at or around the  
 17 reception desk at NAMB headquarters?  
 18 MS. CARRINGTON: Object to the  
 19 extent any knowledge he may have stems from  
 20 attorney-client privileged communications.  
 21 Subject to that objection, you can  
 22 answer.  
 23 A. I personally didn't see it.

Page 111

1 Q. (BY MR. GANT:) Are you aware to  
 2 date that there was such a photo?  
 3 MS. CARRINGTON: Same objection.  
 4 You can answer.  
 5 A. Yes. Yes.  
 6 Q. (BY MR. GANT:) Do you have an  
 7 understanding of the period of time during  
 8 which it was up?  
 9 MS. CARRINGTON: Same objection.  
 10 Subject to that objection, you can answer.  
 11 A. Scott, I don't remember the exact  
 12 time.  
 13 Q. (BY MR. GANT:) Do you remember  
 14 roughly?  
 15 A. No.  
 16 MS. CARRINGTON: Same objection.  
 17 You can answer.  
 18 A. No.  
 19 Q. (BY MR. GANT:) Do you know who  
 20 gave the instruction to post the photo of Dr.  
 21 McRaney up?  
 22 MS. CARRINGTON: Same objection.  
 23 To the extent that the information you may know

Page 112

1 about the photographs stemmed from  
 2 attorney-client privileged communications, I  
 3 object. Subject to that objection, you can  
 4 answer.  
 5 A. No.  
 6 Q. (BY MR. GANT:) You served on the  
 7 NAMB board from 2013 to 2022, correct?  
 8 A. Yes.  
 9 Q. During that time when you served  
 10 on the NAMB Board of Trustees, were you aware  
 11 of NAMB ever putting up a photograph of anybody  
 12 else at the reception desk at NAMB headquarters  
 13 for the purpose of denying that person  
 14 admission to the headquarters?  
 15 MS. CARRINGTON: Object to the  
 16 form of the question, vague, calls for  
 17 speculation. Subject to the objections, you  
 18 can answer.  
 19 A. No.  
 20 Q. (BY MR. GANT:) Have you ever  
 21 discussed with anyone the reason that Dr.  
 22 McRaney's photo was posted at the reception  
 23 desk at NAMB headquarters?

Page 113

1 MS. CARRINGTON: Objection, calls  
 2 for attorney-client privileged communications.  
 3 Subject to that objection, you can answer, if  
 4 you have a source outside of the  
 5 attorney-client privilege.  
 6 A. I don't have a source outside.  
 7 Q. (BY MR. GANT:) So you never  
 8 discussed with anyone other than counsel for  
 9 NAMB the reason why Dr. McRaney's photo was  
 10 posted at the reception desk at NAMB  
 11 headquarters?  
 12 MS. CARRINGTON: Objection to the  
 13 extent it calls for communications that took  
 14 place in an attorney-client privileged  
 15 situation. Subject to that objection, you can  
 16 answer.  
 17 A. Yeah, I am not trying to be  
 18 evasive, Scott. What I am trying to figure out  
 19 is, you know, when that issue was brought up  
 20 or -- I know Will had written about it and then  
 21 in a trustee meeting you would have to address  
 22 it, and that's really about it. So it's not  
 23 like I had conversations with individuals to

Page 114

1 talk about it. Does that make any sense?  
 2 Q. (BY MR. GANT:) Do you recall the  
 3 topic of the posting of Dr. McRaney's photo at  
 4 the NAMB reception desk being addressed at a  
 5 NAMB trustee's meeting?  
 6 MS. CARRINGTON: Objection to the  
 7 extent that the question calls for information  
 8 protected by the attorney-client privilege.  
 9 Subject to the objection, you can answer.  
 10 A. I would say no comment.  
 11 Q. (BY MR. GANT:) Well, there is no  
 12 privileged information. I just asked you if  
 13 you recall it coming up at a Board of Trustees  
 14 meeting. It's a yes or no question. There is  
 15 no privileged content even arguably.  
 16 MS. CARRINGTON: Well, Scott,  
 17 there would be if counsel was present at the  
 18 Board of Trustees meeting. And if you are  
 19 asking him to reveal something that was or was  
 20 not discussed with counsel and trustees, that  
 21 would be privileged.  
 22 MR. GANT: Whether -- it is a yes  
 23 or no whether it came up. We can have a

Page 115

1 discussion about whether the content of the  
 2 communications are privileged. You're leading  
 3 him and coaching him by suggesting that counsel  
 4 was present, which may not have been true. But  
 5 the issue is if that came up at the meeting,  
 6 and you are basically instructing him not to  
 7 answer that. That is improper.  
 8 Q. (BY MR. GANT:) Did it come up at  
 9 a Board of Trustees meeting, yes or no?  
 10 MS. CARRINGTON: Same objection.  
 11 Subject to the objection, if you know, you can  
 12 answer.  
 13 A. I think we are -- I am trying to  
 14 work through here, and maybe George can help me  
 15 or maybe he can't, I am just talking about from  
 16 North American Mission Board. When we have our  
 17 trustee meetings, that is just trustee  
 18 business, it is not -- we go into session and  
 19 it is not for the press to be there, it is not  
 20 for -- it is just where we discuss trustee  
 21 business. So I don't think that I am -- that I  
 22 am supposed to say things that happen in a  
 23 meeting that was just strictly for trustees.

Page 116

1 So --  
 2 Q. (BY MR. GANT:) You are. You are  
 3 under oath and you need to answer my questions.  
 4 There is no privilege -- general privilege over  
 5 trustee meetings, there is no exclusion from  
 6 discovery. You need to answer my questions.  
 7 MS. CARRINGTON: Same objection.  
 8 If counsel was present, then yes, I will  
 9 instruct him to not answer if counsel was  
 10 present. If counsel was not present, he is  
 11 free to answer the question. Subject to that,  
 12 I don't know if you want to --  
 13 MR. GANT: Regardless of whether  
 14 counsel was present, he needs to answer the  
 15 question.  
 16 Q. (BY MR. GANT:) Was it discussed  
 17 at a meeting, yes or no?  
 18 A. So whether counsel was present or  
 19 not --  
 20 Q. Just answer yes or no. Was the  
 21 topic of the posting of Dr. McRaney's  
 22 photograph at the reception desk of NAMB  
 23 headquarters discussed at a NAMB Board of

Page 117	Page 119
<p>1 Trustees meeting, yes or no?</p> <p>2 MS. CARRINGTON: Objection to the</p> <p>3 extent that the question calls for information</p> <p>4 discussed in attorney-client privileged</p> <p>5 communication between counsel and trustees.</p> <p>6 Subject to that objection, you can answer the</p> <p>7 question.</p> <p>8 A. I am confused.</p> <p>9 Q. (BY MR. GANT:) It is a yes or</p> <p>10 no --</p> <p>11 A. I am confused.</p> <p>12 Q. You can answer --</p> <p>13 A. I understand what you are --</p> <p>14 Q. Kat is confusing you because it is</p> <p>15 a yes or no question.</p> <p>16 A. No --</p> <p>17 Q. That is all you need to answer.</p> <p>18 A. No, she is not confusing me. I am</p> <p>19 just trying to figure out that what we talk</p> <p>20 about in trustee meetings is just for trustees.</p> <p>21 Q. Well, Kat, will tell you, I hope,</p> <p>22 that you need to answer my question. There is</p> <p>23 no exception of excluding from discovery what</p>	<p>1 A. I don't know.</p> <p>2 Q. Is every single matter discussed</p> <p>3 at a NAMB Board of Trustees meeting reflected</p> <p>4 in the minutes?</p> <p>5 MS. CARRINGTON: Objection, calls</p> <p>6 for speculation. You can answer.</p> <p>7 A. The way the board is set up is you</p> <p>8 have a working meeting and you can talk about</p> <p>9 some things there that are opened up for a lot</p> <p>10 of discussion and then we have, you know, a</p> <p>11 formal meeting. And everything in the formal</p> <p>12 meeting is in the minutes for the board.</p> <p>13 Q. Do you recall whether the</p> <p>14 discussion of the posting of Dr. McRaney's</p> <p>15 photograph at NAMB headquarters' reception desk</p> <p>16 was discussed as part of the formal portion of</p> <p>17 the NAMB Board of Trustees meeting or the</p> <p>18 informal portion?</p> <p>19 MS. CARRINGTON: Same objection as</p> <p>20 it relates to the limitations of privilege.</p> <p>21 Subject to that, you can answer the question.</p> <p>22 A. I don't remember.</p> <p>23 Q. (BY MR. GANT:) Do you remember</p>
Page 118	Page 120
<p>1 was discussed at trustee meetings. Whether</p> <p>2 it's covered by some attorney-client privilege</p> <p>3 can be subject to discussion between me and</p> <p>4 counsel for NAMB. But there is no exclusion</p> <p>5 from discovering the content of trustee</p> <p>6 meetings, so you need to answer my question and</p> <p>7 you shouldn't be confused about that.</p> <p>8 MS. CARRINGTON: If counsel was</p> <p>9 present -- if counsel was present, the</p> <p>10 conversation would be privileged as it relates</p> <p>11 to this particular topic. If counsel was not</p> <p>12 present, you are free to answer that question,</p> <p>13 Pastor Wood. Subject to all of that, go ahead.</p> <p>14 A. I would say yes.</p> <p>15 Q. (BY MR. GANT:) Do you recall the</p> <p>16 date of the meeting at which this was</p> <p>17 discussed?</p> <p>18 A. No, sir. Sorry, didn't mean to</p> <p>19 say --</p> <p>20 Q. Do you recall the year?</p> <p>21 A. No.</p> <p>22 Q. Do you know whether the discussion</p> <p>23 was recorded in the board minutes?</p>	<p>1 whether any counsel were present at the NAMB</p> <p>2 meeting where the posting of Dr. McRaney's</p> <p>3 photograph was discussed?</p> <p>4 A. I am just not sure. I'd have to</p> <p>5 look back at the minutes of who was there.</p> <p>6 MR. GANT: Let's bring up Exhibit</p> <p>7 K. This is Plaintiff's Exhibit 3.</p> <p>8 (Plaintiff's Exhibit 3 was marked</p> <p>9 for identification.)</p> <p>10 Q. (BY MR. GANT:) It is Bates</p> <p>11 labeled NAMB 5237. Who is Tom Wigginton?</p> <p>12 A. Tom is on the leadership team for</p> <p>13 North American Mission Board.</p> <p>14 Q. Is one of his roles overseeing IT</p> <p>15 at NAMB?</p> <p>16 A. I really don't know. People</p> <p>17 change responsibilities.</p> <p>18 Q. Do you see Mr. Wigginton's name on</p> <p>19 this exhibit?</p> <p>20 A. Yes, I do.</p> <p>21 Q. What is the subject of this</p> <p>22 document?</p> <p>23 A. Will McRaney picture to lobby</p>

Page 121	Page 123
<p>1 desk, no entry in building.</p> <p>2 Q. Did any non-NAMB attorney ever</p> <p>3 explain to you the reason why Dr. McRaney's</p> <p>4 photo was posted at the NAMB reception desk?</p> <p>5 A. Not that I can remember.</p> <p>6 Q. Are you personally aware of Dr.</p> <p>7 McRaney ever making any physical threats</p> <p>8 against anyone at NAMB?</p> <p>9 A. Not that I can remember, no.</p> <p>10 Q. Do you ever remember anybody</p> <p>11 accusing Dr. McRaney of making any threats of</p> <p>12 physical misconduct directed towards anybody at</p> <p>13 NAMB?</p> <p>14 MS. CARRINGTON: Objection, vague,</p> <p>15 calls for speculation. You can answer.</p> <p>16 A. Yeah, from my personal standpoint,</p> <p>17 no.</p> <p>18 Q. (BY MR. GANT:) Are you aware of</p> <p>19 any reason that anyone at NAMB would have fear</p> <p>20 to -- strike that.</p> <p>21 Are you aware of any reason why</p> <p>22 anyone at NAMB would have reason to physically</p> <p>23 fear Dr. McRaney's presence at NAMB</p>	<p>1 for speculation, vague. Subject to those</p> <p>2 objections, you can answer.</p> <p>3 A. I was on the board.</p> <p>4 Q. (BY MR. GANT:) Well, the NAMB</p> <p>5 board meeting where the subject of Dr.</p> <p>6 McRaney's photo came up, do you know sitting</p> <p>7 here today whether that photograph was still</p> <p>8 posted at the time of that trustee meeting?</p> <p>9 MS. CARRINGTON: Objection, asked</p> <p>10 and answered. You can answer again.</p> <p>11 A. I really don't know. I never saw</p> <p>12 the photo.</p> <p>13 Q. (BY MR. GANT:) Do you recall</p> <p>14 whether you were aware that the photo was up at</p> <p>15 any point before it was removed?</p> <p>16 MS. CARRINGTON: Objection, asked</p> <p>17 and answered. Subject to that objection, you</p> <p>18 can answer.</p> <p>19 A. Was I aware it was up before it</p> <p>20 was removed? No, I was not aware -- I was</p> <p>21 trying to make sure I understood the question.</p> <p>22 I was not aware that it was up before it was</p> <p>23 removed.</p>
Page 122	Page 124
<p>1 headquarters?</p> <p>2 MS. CARRINGTON: Objection, vague.</p> <p>3 Object to the form of the question, calls for</p> <p>4 speculation. Subject to those objections, you</p> <p>5 can answer.</p> <p>6 A. I don't know, but I am not there</p> <p>7 in Alpharetta and I am not there at the</p> <p>8 building so --</p> <p>9 Q. (BY MR. GANT:) My question was</p> <p>10 whether you were aware of any reason that</p> <p>11 anyone would fear for their safety in having</p> <p>12 Dr. McRaney present at NAMB headquarters. Are</p> <p>13 you aware of any reason, yes or no?</p> <p>14 MS. CARRINGTON: Same objections,</p> <p>15 asked and answered. You can answer.</p> <p>16 A. I would say no.</p> <p>17 Q. (BY MR. GANT:) And you were on</p> <p>18 the NAMB Board of Trustees when there was an</p> <p>19 instruction for NAMB to post Dr. McRaney's</p> <p>20 photo at the reception desk at NAMB</p> <p>21 headquarters, correct?</p> <p>22 MS. CARRINGTON: Object to the</p> <p>23 form of the question, lack of foundation, calls</p>	<p>1 Q. (BY MR. GANT:) And sitting here</p> <p>2 today, do you have any recollection or</p> <p>3 understanding about at what point in time the</p> <p>4 photograph of Dr. McRaney was removed from the</p> <p>5 NAMB reception desk?</p> <p>6 MS. CARRINGTON: Same objection,</p> <p>7 asked and answered. You can respond.</p> <p>8 A. No, I don't.</p> <p>9 Q. (BY MR. GANT:) Did you ever</p> <p>10 personally instruct anybody to remove Dr.</p> <p>11 McRaney's photograph from the reception desk at</p> <p>12 NAMB headquarters?</p> <p>13 A. No.</p> <p>14 Q. And while you were on the -- while</p> <p>15 you were chairman of the Board of Trustees of</p> <p>16 NAMB, did you ever instruct anyone to not again</p> <p>17 post a photograph of Dr. McRaney at the NAMB</p> <p>18 reception desk for the purpose of denying him</p> <p>19 admission to the building?</p> <p>20 MS. CARRINGTON: Object to the</p> <p>21 form of the question, lack of foundation.</p> <p>22 Subject to those objections, you can answer.</p> <p>23 A. I think if I understood the</p>

Page 165

1 MS. CARRINGTON: Object to the  
 2 form of the question, mischaracterizes what is  
 3 in the letter, mischaracterizes previous  
 4 testimony, vague, lack of foundation,  
 5 speculative, calls for a legal conclusion.  
 6 Subject to all of those  
 7 objections, you can answer.  
 8 A. I am just -- I am not the guy to  
 9 ask these questions, so I really don't know.  
 10 MR. GANT: Let's bring up Exhibit  
 11 L, please, which will be Plaintiff's 10.  
 12 (Plaintiff's Exhibit 10 was marked  
 13 for identification.)  
 14 Q. (BY MR. GANT:) Let's identify  
 15 this for the record. It is Bates labeled NAMB  
 16 5350 through 5352. It says at the top Minutes  
 17 Executive Committee of the Board of Trustees,  
 18 North American Mission Board, SBC; Tuesday,  
 19 February 3rd, 2015; 12:30 p.m.; Las Vegas,  
 20 Nevada. Do you see that?  
 21 A. Yes.  
 22 Q. And do you see yourself listed as  
 23 present in section three?

Page 166

1 A. Yes.  
 2 MR. GANT: If you could just  
 3 scroll through the pages.  
 4 Q. (BY MR. GANT:) And then my  
 5 question is going to be whether you have any  
 6 reason to doubt that this -- strike that.  
 7 My question is does this appear to  
 8 be a true and correct copy of the NAMB Board of  
 9 Trustees minutes for the February 3rd, 2015  
 10 meeting?  
 11 A. Yes.  
 12 Q. Let's go to the page we're on  
 13 right there. I will direct your attention to  
 14 paragraph ten. Remember a moment ago I asked  
 15 you about whether the NAMB termination letter  
 16 to BCMD was part of the process of disciplining  
 17 the BCMD and you said you didn't know? Do you  
 18 recall that?  
 19 A. Yes.  
 20 Q. Can you read into the record the  
 21 first sentence of section ten A?  
 22 A. Yes, I see that.  
 23 Q. Can you read that sentence, it

Page 167

1 says Maryland/Delaware disciplinary process?  
 2 Just read that one sentence.  
 3 A. Yes. Maryland/Delaware  
 4 disciplinary process in hopes of restoration.  
 5 Yeah.  
 6 Q. You didn't recall that from the  
 7 minutes?  
 8 A. I did not what?  
 9 Q. You didn't recall that from the  
 10 minutes that we are looking at?  
 11 A. Not that phrase so -- but I see it  
 12 now.  
 13 Q. Are you familiar with the term  
 14 "disciplinary"? I have the definition if you  
 15 want me to put it on the screen.  
 16 MS. CARRINGTON: Object to the  
 17 form of the question, vague, compound. Subject  
 18 to all of that, you can answer the question if  
 19 you understand it.  
 20 A. If you have got a better  
 21 definition, I --  
 22 Q. (BY MR. GANT:) Are you familiar  
 23 with the term?

Page 168

1 A. Is it a legal term or just the --  
 2 just the definition of discipline?  
 3 MR. GANT: Let's put up R, please.  
 4 Q. (BY MR. GANT:) We are going to  
 5 put it up on the screen.  
 6 A. Yes, I got it.  
 7 (Plaintiff's Exhibit 11 was marked  
 8 for identification.)  
 9 Q. So you see, according to this  
 10 source, disciplinary means relating to  
 11 discipline, i.e. order and/or punishment? Do  
 12 you see that?  
 13 A. Yes, I do.  
 14 Q. Do you have any reason to dispute  
 15 the reliability of that definition?  
 16 MS. CARRINGTON: Objection, vague,  
 17 calls for speculation, calls for a legal  
 18 conclusion, lack of foundation.  
 19 Subject to the foregoing  
 20 objections, you can answer the question.  
 21 A. I guess discipline is discipline.  
 22 MR. GANT: Let's bring up N,  
 23 please.

About



# NAMB Backgrounder: Next Steps in McRaney Lawsuit



## Next Steps in Lawsuit Filed by Dr. Will McRaney against the North American Mission Board



### Background

Dr. Will McRaney resigned as executive director of the Baptist Convention of Maryland-Delaware (BCMD) in June 2015 and signed a severance agreement related to that resignation. Nearly two years later, Dr. McRaney filed a lawsuit against NAMB in April 2017, after demanding that NAMB pay him more than \$7.7 million.

His lawsuit alleges that NAMB intentionally caused BCMD to terminate his employment. The BCMD, however, stated clearly and directly in a March 2016 public statement, “any suggestion that the North American Mission Board (NAMB) or any of its officers influenced the separation of Dr. McRaney’s employment from the Network is false.”

The merits of the case have never been heard by a judge or jury. Instead, the case has, so far, been about whether the courts can and should exercise power over churches and other religious ministries—as Dr. McRaney’s lawsuit claims—or whether that government power is limited under the First Amendment of the United States Constitution so that local church autonomy is protected—as NAMB has consistently asserted.



*NAMB is seeking to protect the local church and religious liberty.*

The back and forth in the courts, up to this point, has only involved NAMB seeking to protect the autonomy of religious organizations and the local church from government interference. Dr. McRaney invites the courts to step in and scrutinize local church and religious ministry decision-making. NAMB does not.

Put simply, if a court can control who NAMB cooperates with in carrying out its religious mission, it can also tell the local church who it must hire to preach its beliefs, teach its faith, and carry out its mission.

NAMB has always believed that disputes involving ministry strategy—whether between churches or any other religious ministries—should not be determined by the power of any government. We are willing to do everything possible—including a request to the U.S. Supreme Court—to defend that religious liberty for every local church and for every pastor.

On June 28, 2021, the U.S. Supreme Court opted not to hear this case.

### *What's next?*

The case has returned to the original trial court, the U.S. District Court for the Northern District of Mississippi (the District Court). NAMB has consistently denied Dr. McRaney's unfounded allegations, and we will continue to vigorously defend against them now that he has once again pushed this into secular court.

The District Court has set a timeline for the case. Both parties will engage in a lengthy process known as "discovery," in which they exchange relevant documents and information, request information from certain non-parties, and ask questions of witnesses in depositions.

During and after the discovery process, the parties may also file various motions. Those motions may be related to discovery or court procedure or may request that the Court dismiss all or some of Dr. McRaney's claims. Once all discovery and motions are completed, the District Court will schedule a trial to determine any claims and issues that may remain at that time.

*NAMB would prefer biblical reconciliation but will respond to the lawsuit.*

In March 2015, while Dr. McRaney was still with the BCMD, NAMB president Kevin Ezell and other NAMB leaders met with Dr. McRaney and other BCMD leaders at the BCMD's offices in Maryland. The parties left the meeting with mutually agreeable plans to improve ministry cooperation.

After Dr. McRaney's resignation, he sent NAMB a letter regarding his prior employment with BCMD. As a result, NAMB offered to meet with him in February 2016, "in keeping with NAMB's desire to obey and follow the scriptures." Dr. McRaney responded in March 2016 that "it would not be productive for us to meet to discuss factual matters," but agreed to meet only to discuss the details of a public, written confession and apology from NAMB's president and the amount of compensation he would be paid as "restitution."

Dr. McRaney then engaged in a lengthy social media campaign aimed at NAMB and its executive leadership.

NAMB again requested to meet with Dr. McRaney during a telephone call with his legal counsel on March 3, 2017 and by correspondence dated March 7, 2017.

In his only response to those requests, Dr. McRaney sent a letter to NAMB on March 8, 2017, in which he demanded payment from NAMB of more than \$7.7 million.

Even after such a demand, NAMB once again offered to meet with Dr. McRaney on March 27, 2017.

Dr. McRaney's response to NAMB's March 27, 2017 offer was to file his lawsuit on April 7, 2017.

During the lawsuit, NAMB representatives have met with Dr. McRaney on more than one occasion to seek resolution of his claims in a Christ-honoring and reasonable manner. It is unfortunate that these efforts have been unsuccessful.

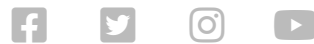
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