

# EXHIBIT O

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI

WILL MCRANEY,  
Plaintiff,

vs.

CIVIL ACTION FILE NO.:  
1:17-cv-00080-GHD-DAS

The North American Mission Board  
of the Southern Baptist Convention,  
Inc.,

Defendant.  
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REMOTE DEPOSITION OF

TOM WIGGINTON

November 3, 2022

9:00 a.m.

(All attendees appeared remotely via  
videoconferencing and/or teleconferencing)

Inger Douglas

CVR No. 7481

CCR No. 5166-3765-6508-0064

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1 Q Is that Alpharetta in Georgia?  
 2 A Yes.  
 3 Q And that's the location of NAMB's headquarters?  
 4 A Yes.  
 5 Q What's the address?  
 6 A I'm sorry? Can you repeat that?  
 7 Q What is the address of NAMB's corporate headquarters?  
 8 A 4200 North Point Parkway, Alpharetta, Georgia 30022.  
 9 Q How long has that been the location of NAMB's  
 10 corporate office or headquarters?  
 11 A It was the corporate office before I came. I'm not  
 12 exactly sure of the date.  
 13 Q Okay. So at least 25 years?  
 14 A Yes.  
 15 Q Was there a renovation of the headquarters done in  
 16 the past ten years that you recall?  
 17 A I do recall a repurposing of the corporate office.  
 18 Q Do you recall when that occurred?  
 19 A I do not recall a specific date. Sitting here I do  
 20 not recall a specific date.  
 21 Q Do you recall the year or years that that happened?  
 22 A I cannot recall a specific year.  
 23 Q Okay. I think the phrase you used was "repurposing".  
 24 Was -- did I hear you correctly?  
 25 A That's correct.

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1 Q What did you mean by that?  
 2 A Changing the purpose of the facility from a corporate  
 3 headquarters to more of an event and conferencing center for  
 4 our mission personnel and partners.  
 5 Q Okay. In connection with the repurposing of NAMB's  
 6 corporate office, was the lobby redone?  
 7 A It was.  
 8 Q Do you remember what changes were made?  
 9 A Specifically flooring was changed.  
 10 Q I'm sorry. What was changed?  
 11 A Flooring.  
 12 Q Oh, flooring. Okay. Do you recall anything else?  
 13 A And furnishing.  
 14 Q What kind of furnishing in the lobby was changed  
 15 during the repurposing of NAMB's corporate office?  
 16 A What kind of furnishing? Probably the desks and  
 17 chairs.  
 18 Q When you say desks, what are you referring to? I've  
 19 never been to the lobby of NAMB's corporate office, so can you  
 20 describe what you're referring to?  
 21 A There is a reception desk and a lobby sitting area.  
 22 Q And what, if anything, was changed about the  
 23 reception desk in the lobby of NAMB's corporate office during  
 24 what you referred to as the repurposing of the office?  
 25 A I believe a new reception desk was installed.

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1 Q Did the approximate location of the desk change?  
 2 A It did not.  
 3 Q Okay. Can you describe what you refer to as the  
 4 reception desk in the lobby of NAMB's corporate office?  
 5 A A circular structure with a counter, an overhanging  
 6 surface at the top, and glass -- logo glass accent on the rear,  
 7 as it -- as it is today.  
 8 Q Okay. Was the reception desk in NAMB's lobby also  
 9 circular prior to the repurposing of the office?  
 10 A Yes.  
 11 Q Okay. So has the basic structure of the reception  
 12 desk looked the same both before and after the repurposing of  
 13 the office?  
 14 A Essentially, yes.  
 15 Q And what would you say is the approximate height of  
 16 the counter around the reception desk?  
 17 A I am not sure.  
 18 Q And can you describe where in the lobby the reception  
 19 desk sits at NAMB's headquarters?  
 20 A Forward close to the entry doors of the lobby.  
 21 Q Okay. And is it back against the wall somewhere or  
 22 is it more in the middle of the room where people circulated  
 23 around it?  
 24 A No. It is not -- there are no walls in the lobby  
 25 between the reception desk and the front door.

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1 Q So people are able to circulate freely 360 degrees  
 2 around that reception desk in the lobby of NAMB's headquarters?  
 3 A They can.  
 4 Q Okay. And that was true before the repurposing of  
 5 the office as well?  
 6 A Correct.  
 7 Q Were you involved in the planning and execution of  
 8 the repurposing of NAMB's office?  
 9 A I did have an oversight liaison role with the  
 10 project, yes.  
 11 Q Okay. Are there before and after photos that NAMB  
 12 has of what the lobby looked like?  
 13 A I am not sure.  
 14 Q Okay. If there were, do you -- based on your  
 15 experience and your role at NAMB, where do you think those  
 16 would reside?  
 17 A I couldn't answer that specifically. I'm not sure of  
 18 specific photos of before and after the lobby or any part of  
 19 that project.  
 20 Q Okay. You were Senior Executive Director of Shared  
 21 Services at the time of the repurposing, correct?  
 22 A That is correct.  
 23 Q Okay. And did you have oversight for the repurposing  
 24 because of your role as to having oversight over NAMB's  
 25 facilities?

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1 A I had oversight of ensuring that every possible  
 2 accommodation would be made to the team that was doing the  
 3 repurposing, yes.  
 4 Q Who were the members of the team that were overseeing  
 5 and responsible for the repurposing of NAMB's office?  
 6 A We outsourced that to a design and contractor firm.  
 7 I don't have specific information on all of those as I sit  
 8 here.  
 9 Q Was there person within NAMB who had primary  
 10 responsibility for overseeing the repurposing project?  
 11 A Again, I had the primary responsibility of liaising  
 12 with the team that executed that.  
 13 Q So when you're referring to a team, you're referring  
 14 to an external team?  
 15 A Yes.  
 16 Q Okay. So there was no internal team at NAMB that had  
 17 primary responsibility for overseeing the repurposing. Is that  
 18 correct?  
 19 A There was not a formal team, no.  
 20 Q Was there someone at NAMB who principally worked with  
 21 you in planning and executing the repurposing of NAMB's office?  
 22 A At several junctures possibly had feedback, yes. But  
 23 specifically a team that met and was operating, no.  
 24 Q Okay. Were you -- who from NAMB was involved in the  
 25 decision to maintain the basic structure and appearance of the

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1 reception desk in NAMB's lobby when you did the repurposing?  
 2 A The -- the design was approved by the President with  
 3 feedback by the design firm, the architect. To the best of my  
 4 knowledge, that was the process.  
 5 Q Okay. Who was the architect?  
 6 A I don't recall.  
 7 Q Do you recall the name of the design firm?  
 8 A I do not.  
 9 Q Okay. I said you don't know -- sorry. Strike that.  
 10 You testified that you don't recall the year that the  
 11 repurposing of NAMB's office was done. If I told you that I  
 12 had heard that it might have been in 2018, does that refresh  
 13 your recollection at all or you still just don't know what year  
 14 it was?  
 15 A I just can't with certainty tell you what year it  
 16 was.  
 17 Q Okay. But it was definitely when you were -- had  
 18 your current job title, correct?  
 19 A Correct.  
 20 Q So sometime during or after 2015, correct?  
 21 A Correct. I'm sorry. Can you repeat that? I thought  
 22 you said sometime after 2015.  
 23 Q I said during or after 2015. I believe you assumed  
 24 your current position in 2015. But let's go back -- let's pull  
 25 Tab 19 back -- Exhibit 1 back up. According to your LinkedIn

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1 profile, it has under your current position October 2015 to the  
 2 present which was the basis for my question. That is accurate,  
 3 correct?  
 4 A That is accurate.  
 5 Q Okay. So we know that the repurposing happened in --  
 6 either in late 2015 or sometime thereafter, correct?  
 7 A Correct.  
 8 Q All right. Okay. Let's -- let's shrink that back  
 9 down and just go over the top of Page 2. This lists four other  
 10 positions that you've had at NAMB. Is that correct?  
 11 A That is correct.  
 12 Q And are these accurate descriptions of both your  
 13 title and the dates during which you held those titles?  
 14 A To the best of my recollection and knowledge, yes.  
 15 Q Okay. Thank you. What's your current annual  
 16 compensation at NAMB?  
 17 A It is -- let me be specific. My base compensation is  
 18 100 -- you know, to be perfectly honest with you, I don't know  
 19 specifically what my base compensation is. I would have to be  
 20 reminded of it, to be honest with you. To be frank, I just  
 21 don't know it.  
 22 Q And you're distinguishing base compensation from  
 23 what?  
 24 A There -- we receive like a cell phone allowance or  
 25 other, you know, little additions to it that are based above

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1 that, so...  
 2 Q What's your -- let's just focus on the base pay. I  
 3 understand you don't -- you're not sure of the exact amount.  
 4 What's your best estimate to the nearest \$10,000 of your  
 5 current base salary?  
 6 A 185 annually.  
 7 Q Okay. And then, you mentioned some other benefits  
 8 including a cell phone allowance. Is that correct?  
 9 A That is correct. I do receive a cell phone  
 10 allowance.  
 11 Q And how long has that been the case?  
 12 A I do not recall.  
 13 Q Has it been months or years or decades?  
 14 A Not decades. Not months. Definitely more than a  
 15 year.  
 16 Q Do you believe you've had a cell phone allowance  
 17 since you've held your current job title?  
 18 A Yes.  
 19 Q And how does that work? You submit a bill for  
 20 reimbursement or you're just provided with a certain amount  
 21 extra on a periodic basis?  
 22 A No. It's...  
 23 Q (Crosstalk).  
 24 A I apologize. I didn't hear the last comment.  
 25 Q I just was clarifying for the -- let me start over.

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1 A I'm sorry. Did you say did I do this at work?  
 2 Q Yes.  
 3 A I really don't have a specific memory of when and  
 4 where this took place.  
 5 Q Okay. Do you remember how you printed a color  
 6 version of the photograph that you found of Dr. McRaney?  
 7 A No, I really don't.  
 8 Q So you don't recall the specifics, but you searched  
 9 for and you found a color photograph of Dr. McRaney. We're  
 10 seeing a black-and-white version of that as Exhibit 2, correct?  
 11 A That's correct.  
 12 Q And you somehow printed a color version of it. You  
 13 don't recall the circumstances. And then, you gave it to the  
 14 receptionist at the reception desk in NAMB's lobby, correct?  
 15 A My recollection is that I did give the copy to the  
 16 receptionist, yes.  
 17 Q But you don't recall what person that was that you  
 18 gave it to, correct?  
 19 A I -- I don't want to speculate. I don't remember.  
 20 Q Okay. Did you provide any written instructions to  
 21 the receptionist when you transmitted the color photograph of  
 22 Dr. McRaney to be put up at the reception desk at NAMB's  
 23 headquarters?  
 24 MS. CARRINGTON: Object to the form of the question.  
 25 You can answer.

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1 THE WITNESS: I do not recall giving any instructions  
 2 on posting or treatment of the document or photo at all.  
 3 BY MR. GANT:  
 4 Q Okay. But you -- I assume you agree there must have  
 5 been some instructions; otherwise, the person would not have  
 6 know, what to do with it. Is that fair?  
 7 A The recollection I have was related to -- I just  
 8 don't have -- I really just don't have a recollection of the  
 9 event. I'm sorry. It just was so long ago. I don't have an  
 10 independent or a specific recollection of it.  
 11 Q Before or after you were given instruction about  
 12 obtaining and putting up a photo of Dr. McRaney at the NAMB  
 13 reception desk, were you ever instructed any other time to do  
 14 something similar with respect to any other individual?  
 15 MS. CARRINGTON: Object to the form of the question.  
 16 You can answer.  
 17 THE WITNESS: It was not uncommon for guests, VIPS,  
 18 special guests to -- especially when we didn't know who  
 19 they were or we didn't have -- you know, didn't have  
 20 recognition of them to provide the receptionist desk with  
 21 a photo. Many times that photo was posted on the  
 22 monitors, especially for a speaker. So it's not uncommon  
 23 to communicate to the reception desk a picture of some  
 24 guest coming to the building with -- and not uncommon for  
 25 us to do that at all.

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1 BY MR. GANT:  
 2 Q And those circumstances that you described, for  
 3 example, for VIPs and special guests, were for the purpose of  
 4 welcoming those persons into the NAMB lobby and the NAMB  
 5 building, correct?  
 6 A Welcoming as well as connecting them to the  
 7 appropriate party and organization at NAMB, yes.  
 8 Q Can you ever recall a circumstance in which a  
 9 photograph of an individual was put up at the reception desk at  
 10 NAMB's headquarters for the purpose of ensuring that that  
 11 person did not enter into NAMB's headquarters or offices?  
 12 A I am not aware of any circumstance related to that,  
 13 no.  
 14 Q Do you recall how long the photograph of -- oh,  
 15 strike that. The circumstance when a VIP or special guest is  
 16 coming in and there may be a photograph of that person, that's  
 17 for a particular event or meeting on a particular date. Is  
 18 that correct?  
 19 A It could be, yes. Uh-huh.  
 20 Q Can you think of any other specific circumstance  
 21 where you kept up a photograph of an individual, a VIP or a  
 22 special guest, for months at a time?  
 23 A I cannot think of any event related to that. If the  
 24 -- if the arrival date of the guest is known and comes and  
 25 passes, it would be -- it would be kept until the arrival date,

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1 I assume. But, no, I don't have any specific knowledge.  
 2 Q And then, taken down after the event had occurred,  
 3 correct?  
 4 A That would be a normal practice, yes.  
 5 Q At the time that the photograph of Dr. McRaney was  
 6 put up at the NAMB reception desk, was NAMB expecting Dr.  
 7 McRaney to arrive for a meeting or a conference?  
 8 A Not to my knowledge, no.  
 9 Q Do you have any basis to dispute that the photograph  
 10 of Dr. McRaney was put up at the NAMB reception desk on  
 11 February 5, 2016?  
 12 MS. CARRINGTON: Object to the form of the question,  
 13 but you can answer.  
 14 THE WITNESS: I'm sorry. I didn't hear the full  
 15 question, so can you please say that again? I apologize.  
 16 BY MR. GANT:  
 17 Q Sure. Do you have any specific basis to dispute that  
 18 the photograph of Dr. McRaney that we've been discussing was  
 19 put up at the reception desk at NAMB headquarters on February  
 20 5, 2016?  
 21 MS. CARRINGTON: Object to the form of the question.  
 22 You can answer.  
 23 THE WITNESS: I do not know the specific date that  
 24 the photo was placed anywhere. I don't know -- I don't  
 25 know that specific date at all.

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1 Exhibit 4. Can you just show the Bates number just so he  
 2 can see what I was referring to?  
 3 (Plaintiff's Exhibit No. 4 was identified.)  
 4 BY MR. GANT:  
 5 Q Okay. There's the Bates number, and we'll just go up  
 6 to the top third of the document which has all the writing.  
 7 Are you able to see this?  
 8 A I am.  
 9 Q Did you see this document yesterday?  
 10 A Yes.  
 11 Q Prior to yesterday, when was the last time you saw  
 12 this document?  
 13 A No -- no recollection.  
 14 Q Do you know one way or another whether you ever saw  
 15 this document before yesterday?  
 16 A I have no recollection of it, no.  
 17 Q Do you recognize the format of the document?  
 18 A It looks to be a printed copy or a printed version of  
 19 an Outlook Task.  
 20 Q Do you sometimes create or does someone create for  
 21 you tasks for yourself to perform using Outlook?  
 22 A I do.  
 23 Q Okay. Does this appear in the format of a task for  
 24 yourself that would be created using Outlook?  
 25 A Yes.

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1 Q Do you have any basis for disputing that this is, in  
 2 fact, a true and correct copy of a task for yourself created  
 3 using Outlook in NAMB's system?  
 4 A I would agree that it is a task in Outlook created,  
 5 yes.  
 6 Q In NAMB's system, correct?  
 7 A In NAMB's system. Correct.  
 8 Q Okay. The subject of this task is "Will McRaney  
 9 picture to lobby desk - no entry in building". Do you see  
 10 that?  
 11 A I do.  
 12 Q And as we discussed, you understand the reference to  
 13 lobby desk to be what you earlier were calling the reception  
 14 desk, correct?  
 15 A Correct.  
 16 Q And then, it says, "Due date February -- Friday,  
 17 February 5, 2016." Do you see that?  
 18 A I do.  
 19 Q And when you -- a task of yours is being created  
 20 using Outlook, what does the due date typically refer to?  
 21 A Typically in Outlook, the due date defaults to the  
 22 date it's created unless you specify a future date.  
 23 Q Okay. And is the purpose of specifying a due date to  
 24 indicate the date in which the test is -- should be performed?  
 25 A Yes.

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1 Q And the -- under status in this task document, it  
 2 says, "Completed." Do you see that?  
 3 A I do.  
 4 Q And under it, it says, "Percent complete,  
 5 100 percent." Do you see that?  
 6 A I do.  
 7 Q Do you understand on this particular task 100 percent  
 8 complete to mean that the photograph of Dr. McRaney that you  
 9 had obtained had been put up at the NAMB reception desk?  
 10 MS. CARRINGTON: Object to the form of the question.  
 11 You can answer.  
 12 THE WITNESS: I would not characterize what happened  
 13 to the photo once it was delivered to the lobby desk. But  
 14 that would indicate that the task was completed, yes.  
 15 BY MR. GANT:  
 16 Q The task being obtaining a photograph of Dr. McRaney  
 17 and providing it to the reception desk?  
 18 A That's correct.  
 19 Q And the date that task was completed was February 5,  
 20 2016, according to this document, correct?  
 21 A That's correct.  
 22 Q And you don't have any facts to dispute that, do you?  
 23 A I do not. I'm not aware of any.  
 24 Q Okay. And the last item is Owner. What does that  
 25 refer to here?

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1 A That is the account that the task was created under  
 2 or assigned to.  
 3 Q Now, do you know whether you typed the information  
 4 into Outlook yourself for this task that's marked as Exhibit 4  
 5 or whether someone else did it for you?  
 6 A I have no specific memory of this at all.  
 7 Q Okay. And in or around February 2016, did anyone  
 8 else create Outlook tasks for you, or did you prepare your own?  
 9 A I would normally prepare my own, yes.  
 10 Q And you don't have any basis to dispute that you  
 11 prepared the Outlook task reflected in Exhibit 4, correct?  
 12 A I can't definitively say I did or not.  
 13 Q Okay. Well, you said at the time your practice was  
 14 to do them yourself, correct?  
 15 A My normal practice is to do them myself. Correct.  
 16 Q Okay. And you don't have any specific recollection  
 17 of asking anyone else to create the Outlook task marked as  
 18 Exhibit 4, correct?  
 19 A I have no recollection of the Outlooks task marked  
 20 Exhibit 4.  
 21 Q Okay. You don't have any specific basis to dispute  
 22 that you typed in the subject line for the Outlook task marked  
 23 as Exhibit 4, correct?  
 24 A Again, I have no recollection of this task  
 25 whatsoever.

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1 Q Okay. My question was: Do you have any specific  
 2 basis for disputing that you typed in the information listed  
 3 under subject in this Outlook task? Do you have any --  
 4 A (Crosstalk).  
 5 Q -- any basis for disputing that you typed that?  
 6 A No. I understand your question. I would not have  
 7 either/or a basis because I don't recall the task at all.  
 8 Q Okay. But what I'm trying to understand, and I'm  
 9 entitled to know, is if -- you're testifying under oath. I  
 10 want to know if there's a reason you can think of that would  
 11 support the notion that you didn't type what's set out in the  
 12 subject line of this Outlook task. If you have any reason to  
 13 doubt it, any specific basis for thinking and demonstrating you  
 14 didn't type this, I'd like to know it. If you have none, then  
 15 that's -- that's what I'm trying to find out.  
 16 A I don't have any specific recollection to either  
 17 confirm or dispute it.  
 18 Q Okay. But you -- you are not disputing that this is  
 19 an authentic Outlook task for you as the owner that was created  
 20 in connection with your work at NAMB? You're not disputing  
 21 that, are you?  
 22 A I have no recollection of this task. I have no  
 23 recollection of creating it or completing it in the Outlook  
 24 system. That's my -- that's my answer and my testimony.  
 25 Q Okay. But you oversee information technology at

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1 NAMB, correct?  
 2 A I do.  
 3 Q That includes the creation and maintenance of Outlook  
 4 tasks, correct?  
 5 MS. CARRINGTON: Object to the form of the question.  
 6 You can answer.  
 7 THE WITNESS: It involves the system, Outlook, that  
 8 creates -- that this task essentially was created in, yes.  
 9 BY MR. GANT:  
 10 Q And I will represent to you this document was  
 11 produced to us by counsel for NAMB. Is that your understanding  
 12 as well?  
 13 A As I sit here, I don't know who produced it. So I'll  
 14 -- I will take your word for that. Again, I don't remember  
 15 this at all. No recollection of it whatsoever.  
 16 Q But you're not disputing its authenticity, are you?  
 17 MS. CARRINGTON: Object to the form of the question,  
 18 but you can answer.  
 19 THE WITNESS: I would not -- I would not have any  
 20 reason to think it's inauthentic, no.  
 21 BY MR. GANT:  
 22 Q In preparation for today's deposition, did you see  
 23 any other documents that reflected other Outlook tasks other  
 24 than the one that's marked as Exhibit 4?  
 25 A Again, as I sit here now, I can't recall what

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1 happened yesterday. If you want to show it to me, I can maybe  
 2 specifically address it. But I can't recall in detail.  
 3 Q Okay. At the time you obtained the photograph of  
 4 Dr. McRaney, had anyone at NAMB communicated to you that they  
 5 believed that Dr. McRaney posed a physical threat to NAMB  
 6 personnel or the facility?  
 7 A Not -- no. Not to my recollection at all, no.  
 8 Q Did anyone subsequent to your obtaining the  
 9 photograph of Dr. McRaney communicate to you that they believed  
 10 that Dr. McRaney posed a physical threat to NAMB personnel or  
 11 the facility?  
 12 A I have no recollection of that, no.  
 13 Q Your obtaining the photograph of Dr. McRaney didn't  
 14 have anything to do with a concern about violence or security  
 15 risks, correct?  
 16 A No.  
 17 Q No, that's not correct, or no, there were no  
 18 concerns?  
 19 A I'm sorry.  
 20 Q Can you clarify?  
 21 A I'm so -- I'm so sorry. No. It had nothing to do --  
 22 rephrase it so I'm certain. Did you say violence?  
 23 Q Yeah.  
 24 A I -- I apologize.  
 25 Q Yeah. When you were -- in connection with your

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1 obtaining the photograph of Dr. McRaney and providing it to the  
 2 reception desk at NAMB, was that undertaken out of a concern  
 3 about security or a risk of violence posed by Dr. McRaney?  
 4 A No.  
 5 MR. GANT: Okay. Let's go off the record and take a  
 6 short break.  
 7 VIDEOGRAPHER: The time is now 11:12. We're going  
 8 off the video record. This completes media unit number  
 9 two.  
 10 (Break was taken.)  
 11 VIDEOGRAPHER: The time is now 11:19. We're back on  
 12 the video record. This begins media unit number three.  
 13 You may proceed.  
 14 MR. GANT: Thank you.  
 15 BY MR. GANT:  
 16 Q Welcome back from the break, Mr. Wigginton. Did you  
 17 speak with anyone during the break about anything related to  
 18 the deposition?  
 19 A I did not.  
 20 Q Okay. We don't need to bring it back up unless you  
 21 want to see it. But do you remember there was some language in  
 22 your LinkedIn page about "influencing others through love,  
 23 humility, respect, and courage"? Do you remember that?  
 24 A Yes.  
 25 Q Would you consider an element of treating others with

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1 respect and humility is following the Golden Rule?  
 2 MS. CARRINGTON: Object to the form of the question.  
 3 You can answer.  
 4 THE WITNESS: The Golden Rule being defined as treat  
 5 others as you would want to be treated?  
 6 BY MR. GANT:  
 7 Q Yes. That's my understanding of the -- the Christian  
 8 version of the Golden Rule, yes.  
 9 A And your question is: For the statement I have on my  
 10 LinkedIn page is defined by that -- by the Golden Rule? I'm  
 11 sorry. I don't understand what you're...  
 12 Q Let me -- yeah. Your -- the statement you have there  
 13 in the About section --  
 14 A Yes.  
 15 Q -- refers to love, humility, respect, and courage.  
 16 Do you see those words?  
 17 A Yes. Yes, I do.  
 18 Q So not specifically tied to what you wrote there, but  
 19 when I think about respect and I think about humility, a part  
 20 of what I think about is the Golden Rule, which as you  
 21 described it is to -- the way I usually hear it is do unto  
 22 others as you would have them do unto you. Do you agree that  
 23 that's essentially what you just described?  
 24 A As the Golden Rule, yes, I agree.  
 25 Q Okay. Do you believe in the Golden Rule?

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1 A I do.  
 2 Q Do you try and live your life according to the Golden  
 3 Rule?  
 4 A Personally, yes, I do.  
 5 Q Do you think that NAMB should conduct itself in  
 6 accordance with the Golden Rule?  
 7 A I believe that NAMB as an entity does conduct itself  
 8 according to the Golden Rule.  
 9 Q And do you...  
 10 A I -- well, can I clarify?  
 11 Q Sure.  
 12 A Can I step back and clarify?  
 13 Q Yes.  
 14 A Personally that's my opinion, yes.  
 15 Q Okay. Do you personally think that NAMB should  
 16 conduct itself in accordance with the Golden Rule?  
 17 A I personally believe they do, yes.  
 18 Q And should?  
 19 A Do is my answer, yes.  
 20 Q You won't say -- you won't say should? You won't  
 21 agree to that?  
 22 A And should.  
 23 MR. GANT: Okay. Let's bring up Tab 20. While it's  
 24 being called up, I'll just identify the Bates numbers,  
 25 which are NAMB 7512 through 7513.

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1 (Plaintiff's Exhibit No. 5 was identified.)  
 2 BY MR. GANT:  
 3 Q Do you agree, Mr. Wigginton, that the first page of  
 4 this exhibit has the NAMB logo or letterhead at the top of the  
 5 first page?  
 6 A I do. Kat is bringing it up. Yes, I see it now.  
 7 Q Okay. Do you recognize that as...  
 8 A Yes, I do. NAMB logo, yes.  
 9 Q Now, I think you testified earlier that your  
 10 searching for and retrieving a photograph of Dr. McRaney was  
 11 related to a letter of concern. Do you remember using that  
 12 phrase, "letter of concern"?  
 13 A I did. I do, yes.  
 14 Q And I...  
 15 MR. GANT: Is this Exhibit 5?  
 16 VIDEOGRAPHER: Yes, it is.  
 17 MR. GANT: Thank you.  
 18 BY MR. GANT:  
 19 Q Is Exhibit 5 a response by NAMB to the letter of  
 20 concern you were referencing earlier?  
 21 A I am not familiar with this response -- with this  
 22 exhibit.  
 23 Q When you say you're not familiar with it, meaning you  
 24 don't recall seeing it before I just showed it to you?  
 25 A I don't have a specific recollection of seeing it,

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1 no.  
 2 Q Okay. So you're just not sure whether you've seen it  
 3 before; is that fair?  
 4 A I don't have a specific recollection of seeing it  
 5 before.  
 6 Q Do you have a general recollection of having seen it  
 7 before?  
 8 A I don't have any recollection of seeing it before.  
 9 Q Do you have any recollection of discussion within  
 10 NAMB of a response to Dr. McRaney's letter of concern from the  
 11 NAMB Board of Trustees?  
 12 A I do not have a recollection specifically about that,  
 13 no.  
 14 Q Do you have a general recollection that the NAMB  
 15 Board of Trustees prepared a response to Dr. McRaney's letter  
 16 of concern?  
 17 A I do have some recollection that that took place, but  
 18 I never saw -- I don't recall the contents of this, no.  
 19 Q This document with the NAMB logo at the top of the  
 20 first page is entitled "Response to Will McRaney's Letter of  
 21 Concern", correct?  
 22 A I'm sorry. Can you repeat the last part of your  
 23 phrase again?  
 24 Q This exhibit...  
 25 A Or your question. I'm sorry. Your question?