

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

Will McRaney,

Plaintiff,

v.

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

Defendant.

Case No. 1:17-cv-00080-GHD-DAS

**PLAINTIFF'S RULE 56(d) RESPONSE TO  
DEFENDANT'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

Defendant NAMB seeks summary judgment with respect to Counts I and II of the Complaint based on NAMB's contention that it was released by a Separation Agreement between Plaintiff, Dr. Will McRaney, and his former employer, BCMD, claiming NAMB was a "supporting organization" of BCMD, covered by general release language in Section 5 of the Separation Agreement. *See Docs. 79 & 80.*

For the reasons set forth in the accompanying memorandum, Plaintiff opposes NAMB's motion, and requests, pursuant to Federal Rule of Civil Procedure 56(d), that the motion for partial summary judgment be deferred or denied until the completion of discovery, at which point the motion can be fully briefed and adjudicated.

Plaintiff's Rule 56(d) Response is supported by the Declaration of Charles Lindsay, CPA, attached as an exhibit hereto.

\* \* \* \*

Plaintiff reserves all other responses and arguments in opposition to Defendant's motion, to be filed with the Court at a later date, as directed by the Court. *See Doc. 84.*

September 20, 2021

Respectfully Submitted,

*Scott E. Gant*

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