

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION

WILL McRANEY

PLAINTIFF

v.

No. 1:17cv080-GHD-DAS

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

DEFENDANT

DANNY WOOD'S RESPONSE TO SUBPOENA TO PRODUCE DOCUMENTS,
INFORMATION, OR OBJECTS

Danny Wood, by and through counsel and pursuant to Federal Rule of Civil Procedure 45, responds to the Subpoena to Produce Documents, Information, or Objects issued June 14, 2022 as follows:

DOCUMENT REQUESTS

REQUEST NO. 1: All documents in Your possession, custody or control mentioning or referring to Will McRaney (including documents mentioning or referring to him, but not using his name), including all of Your communications with others (including NAMB or its representatives or its counsel) about Will McRaney.

RESPONSE: Mr. Wood objects to this Request to the extent it requests documents reflecting communications between Mr. Wood and legal counsel for NAMB on the grounds that, as a former member of NAMB's Board of Trustees, any communications in Mr. Wood's capacity as a member of the Board with legal counsel for NAMB are protected by attorney-client privilege. Subject to and without waiving this objection, Mr. Wood refers Plaintiff to the responsive documents produced herewith bearing Bates Nos. WOOD 000001-00009. Redacted portions of the documents produced include communications between legal counsel for NAMB, NAMB personnel, and members of NAMB's Board of Trustees, which are privileged and which contain protected attorney work product regarded the email forwarded.

REQUEST NO. 2: All documents in Your possession, custody or control mentioning or referring to this case, or mentioning or referring to the facts or allegations or NAMB's defenses in this case.

RESPONSE: Mr. Wood objects to this Request to the extent it requests documents reflecting communications between Mr. Wood and legal counsel for NAMB on the grounds that, as a former member of NAMB's Board of Trustees, any communications in Mr. Wood's capacity as a member of the Board with legal counsel for NAMB are protected by attorney-client privilege. Subject to



and without waiving this objection, Mr. Wood does not currently have in his possession any privileged or non-privileged documents responsive to this Request.

Respectfully submitted, this the 8th day of July, 2022.

By: s/ Alexa Ortiz Hadley

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*Counsel for Defendant The North American Mission
Board of the Southern Baptist Convention, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this day I had served via email a true and correct copy of the above and foregoing document to all counsel of record.

SO CERTIFIED, this the 8th day of July, 2022.

s/ Alexa Ortiz Hadley

ALEXA ORTIZ HADLEY

From: Danny Wood <dwood@shades.org>
Sent: Friday, February 5, 2016 7:44 AM
To: Ezell, Kevin <kezell@NAMB.NET>
Subject: Re: Letter of Concern

I am writing a letter to all the recipients of Will's letter expressing my hurt feelings that he does not consider me having a leadership role in the SBC evidenced by leaving me off the list! (Actually he put my name but attached it to a fictitious email address...oh the inhumanity!) He has caused harm to me and my family and totally embarrassed me in front of 7500 members of Shades (granted 2500 are non-resident and we have no idea where they are but 7500 sounds better). Having forfeited my big boy pants long ago, I will whine to whoever will listen and demand an investigation into this blatant character assassination that will result in fewer baptisms, reduced giving, and leaving countless missionaries and church planters out to dry due to our nonsupport. 😞😞

Kevin...everyone is in your corner praying for you and ready to go to battle with you and for you. Our shields are locked together surrounding you and your family. Thanks for your bold leadership!

Danny Wood

Sent from my iPhone

On Feb 5, 2016, at 5:29 AM, Ezell, Kevin <kezell@NAMB.NET> wrote:

Didn't want u left out
:)

Sent from my iPad

Begin forwarded message:

From: Will McRaney <will@willmcraney.com>
Date: February 4, 2016 at 2:45:53 PM EST
To: Andy Addis <andy@crosspointnow.net>, Andy Childs <andychilds@ebenezerbaptist.com>, BJ Bateman <bj@cefgreenville.com>, Barry Anderson <barry@mygvbc.com>, Bill Ingram <bingram@mabc.us>, Bill Logan <billlogan@immanuelridgecrest.org>, Blake Gideon <sgorham@fbcedmond.org>, Bob Dickerson <pastor@fbmarion.org>, Bob Lowe <lowerj@juno.com>, Brent Campbell <trbadom@centurytel.net>, Bruce Franklin <bfranklin@gloryroad.net>, Chuck Herring <cherring@fbccoll.org>, Dan Walker <dwalker@slba.org>, Danny Ringer <dringer@cableone.net>, Danny Wood <stjohn@shades.org>, Danny de Armas <DannydeArmas@FirstOrlando.com>, David Green <daviddgreen.ddg@gmail.com>, David Parks <dparks@ddafcpa.com>, David Saylor <pdave777@gmail.com>, David Washington <pastordavid@cantoncf.org>, Denny Gorena <office@fbcleonardtx.org>, Ferrel Wiley <ferrel@srbllife.com>, Gary Yochum <pastorgary@harrisonhills.org>, Greg Varndell <greg@fairlawnbaptist.com>, Heath Peloquin <hpeloquin@sbtexas.com>, Joey Anthony <joey.anthony@mpbclife.com>, Keith Warden <keithw@fbcpic.net>, Lane Moore <lmoore@nwlba.org>, Larry Robertson <lrobertson@tnbaptist.org>, Manuel Martinez <pastor@pibi.org>, Mark Dyer <dyer@mdjwlaw.com>, Mike McLemore <mikem@bbaonline.org>, Natalie White <deaconbell2@verizon.net>, Shane Sowers <shane@centralbaptisthawaii.org>, Spike Hogan <spike@chetscreek.com>, Stephen Spurgin <sspurgin@fbcmiamisburg.org>, Steve Hardy <shardy@ncbaptist.org>, Tad Thompson <tthompson@habc.net>
Cc: Ezell Kevin <kezell@namb.net>
Subject: Letter of Concern

Dear NAMB Trustee,

I am writing you because of your leadership role in the SBC. As a trustee of the Southern Baptist Convention assigned to the North American Mission Board, I value the role you play in providing oversight, accountability and insuring good stewardship on behalf of all Southern Baptist church members.

I appreciated the opportunity to serve the 560 churches of the Mid-Atlantic Baptist Network (MD/DE Baptist Convention) as the Executive Director until my shocking termination on June 8, 2015. In relation to my termination, I have written the attached letter of concern. This letter relates to Dr. Kevin Ezell's interference with matters related to the Mid-Atlantic Baptist Network and my role as the Exec. Director the Network.

The attached letter is being sent to various leaders of the SBC, all NAMB trustees, and select leaders in the Mid-Atlantic Baptist Network because of their relationship in some way to this matter.

Thank you kindly for your consideration.

Will McRaney

PS You are receiving this in electronic form because I was able to locate what I believed to be your email address. My apologies to the other trustees if I was not able to locate an email for them. However, a paper copy has been mailed to you and each NAMB trustee to the address located in the SBC Annual.

<Letter of Concern Ezell NAMB.docx>

From: Danny Wood <dwood@shades.org>
Sent: Thursday, February 4, 2016 5:50 PM
To: Logan, Clark <clogan@NAMB.NET>; Chuck Herring (CHerring@fbccoll.org) <CHerring@fbccoll.org>; Ezell, Kevin <kezell@NAMB.NET>; Ebert, Mike <mebert@NAMB.NET>
Subject: Re: From the Board Chairman -- re: Will McRaney Email

Apparently Will doesn't like me either because I did not get an email. Do you need to forward a copy to me?

Danny Wood

Sent from my iPhone

On Feb 4, 2016, at 4:48 PM, Logan, Clark <clogan@NAMB.NET> wrote:

This email is being sent on behalf of Chuck Herring, Chairman, Board of Trustees NAMB/SBC:

My Fellow Trustee,

James wrote these powerful words—*“So also the tongue is a small part of the body, and yet it boasts of great things. See how great a forest is set aflame by such a small fire!” (James 3:5)* You received an email from Will McRaney today that called into question the integrity of our President and the strategic

direction and effectiveness of NAMB. I have personally been involved in this situation for some time. His virulent opposition has gone too far. Your board officers will get with Kevin, his leadership team, and our legal counsel to formulate an appropriate response. At that time we will inform you about the NAMB'S actions. I would encourage you not to respond to Will personally. Please be in prayer for Kevin and His team.

To God Be The Glory,

Chuck Herring (CHerring@fbcoll.org)

-----Original Message-----

From: Mark Dyer <dyer@mdjwlaw.com>

Sent: Wednesday, June 29, 2016 5:29 PM

To: George McCallum <gmccallum@namb.net>; Kevin Ezell <kezell@namb.net>; cferrer@namb.net

Cc: spike@chetscreek.com; Danny Wood <dwood@shades.org>

Subject: Fwd: follow-up on investigation - Atty/Client Communications

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Begin forwarded message:

From: Chuck Herring <CHerring@fbccoll.org<mailto:CHerring@fbccoll.org>>

Date: June 29, 2016 at 11:30:30 AM CDT

To: Mark Dyer <dyer@mdjwlaw.com<mailto:dyer@mdjwlaw.com>>

Subject: Fwd: follow-up on investigation

Mark,

David Green forwarded this email by McRaney to me. I wanted to send it to you. I thank the Lord for you, Spike, and Danny!

Chuck Herring

Sent from my iPhone

Begin forwarded message:

From: David Green <daviddgreen.ddg@gmail.com<mailto:daviddgreen.ddg@gmail.com>>
Date: June 29, 2016 at 11:17:56 AM CDT
To: Chuck Herring <cherring@fbccoll.org<mailto:cherring@fbccoll.org>>
Subject: Fwd: follow-up on investigation

David D. Green
Sent from my iPhone

Begin forwarded message:

From: Will McRaney <will@willmcraney.com<mailto:will@willmcraney.com>>
Date: June 29, 2016 at 11:50:44 AM EDT
To: Green David <daviddgreen.ddg@gmail.com<mailto:daviddgreen.ddg@gmail.com>>
Subject: follow-up on investigation

David,

I don't want to add to your burden, but as long as you are a trustee, you have chosen to deal with these matters on behalf of Southern Baptists. I wish it were not true or happening, but it is. One pastor with firsthand information wrote Ezell and Herring directly and separately that the investigation was a 'charade'. Another pastor described it this way. "In other news, the NFL has concluded an internal investigation of Deflategate conducted by a three-person, blue ribbon committee consisting of Tom Brady, Bill Belichick and Robert Kraft. No wrongdoing was discovered, and the matter is now closed."

Or, the defendant met with his own legal team and they determined to proclaim his innocence without hearing evidence or cross examination of the defendant. The closed door investigation by NAMB officers did not include hearing evidence from MD/DE pastors or me who were witnesses and are making the accusations. Neither was there cross examination in keeping with Prov. 18:17 and legal protocol. The problem is Ezell cannot be believed and those below him in my situation have shared misinformation upline as well. I have confront Steve Davis and Jeff Christopherson with their part, but of course they don't want to deal with the facts and they cannot contradict them. When is someone involved going to obey the Bible in these matters?

BP writes a story about the investigation being completed, but does not share the accusations or the findings of the investigation. There are many who's hands are dirty and have operated outside of the light. Here is a link to an article with my quotes about the supposed investigation and subsequent vote of the NAMB trustees.

<http://christianexaminer.com/article/former-sbc-state-leader-charges-mission-board-with-cover-up-of-wrongdoing/50796.htm>

David, Ezell's actions have made him unfit for leadership of our national missions agency. He has damaged people, trust, our mission's effectiveness and capacity, and most importantly shook his fist before God with his behaviors. While you are not directly responsible for Ezell's actions (and the lying/cover-up culture among some of his leaders - of course I can prove it to anyone looking for the truth), you are responsible for your part of the corporate cover-up and sin.

He has damaged me significantly which brings Biblical demands. Additionally, I believe a judge would find him guilty of

libel and tortious interference. If patterns hold, Ezell will continue to bully, deceive trustees and Southern Baptists, damage leaders who dare to tell him 'no', and be as ineffective in his mission as he has been. People are confusing affability and handouts with character and integrity.

By any historic standard, the current NAMB strategy is failing significantly. Did you know, that according to the 2006 study by NAMB under Stetzer revealed that the average among 12 denominations and Networks that the baptism ratio for new plants over the first 4 years of reporting is 1:5 on baptisms per members. Ezell touted 1:14 at the SBC. Membership is a terrible way to measure effectiveness when compared to established churches for a host of reasons. So, what he used was misleading as usual and even in that it is terrible results compared to other groups who are planting churches.

You and others can do something about it but it will take courageous faith. Ezell cannot defend his written lies and accusations with cross examination. He provided written cancellation of \$1 million committed to MD/DE and he blamed it on me and my repeated violations of the agreement. HE CANNOT PROVE A SINGLE VIOLATION OF THE AGREEMENT AND I CAN PROVE HIS REPEATED VIOLATIONS. Who is going to demand that he give an account of his accusations and threats? I am and have been available to clearly show with Ezell's own writings that he is guilty many times over.

Tough times call for faithful and courageous men who fear God more than fearing men. The truth only seen by those looking for it. The rest are actively or passively involved in the cover-up. I will pray for you as to your role and responsibilities under the leadership of God.

Will

PS In most of SBC life after 29 years, I am untouchable, except for some local churches. I want you to know that since the first of the year I have earned less than \$1,000. God allowed it. Some of the elected leadership in MD is responsible. However, you and other trustees are responsible for Ezell's behaviors. Ezell meant it for evil and he has succeeded temporarily. However, God is not mocked and will not let the righteous go begging for bread.