

EXHIBIT H

MOHLER

DEPOSITION

EXHIBIT #21

EXHIBIT	
21	
DEPONENT NAME:	DATE:
Mohler	10/8/24

CONFIDENTIAL MATTER

THE SOUTHERN BAPTIST THEOLOGICAL SEMINARY

MEMORANDUM

Date: May 21, 2018

Re: Meeting with Dr. Mohler, President of Southern Seminary

From: Jonathan B. Austin, Executive Assistant to the President

This Memorandum is a summary of the undersigned's meeting with Dr. Mohler (RAM) and Dr. Stinson, Senior VP and Provost of SBTS (Stinson), on Monday, May 21, 2018, and was prepared at RAM's instruction.

- RAM received a phone call from Dr. Thom Rainer, President & CEO of LifeWay (Rainer), on Monday, May 21, 2018, at approximately 1:35pm/EST to discuss a serious matter.
- RAM asked for about 10 minutes. RAM asked Dr. Adam Greenway, Dean of Billy Graham School at SBTS (Greenway), to join him on the call (as Stinson was unavailable).
- Rainer called back at 1:45pm/EST. On the call were RAM, Greenway, Rainer, Eric Geiger, Senior VP at LifeWay (Geiger), and Ms. Jennifer Lyell, a current employee of LifeWay and a former employee of SBTS (Lyell).
- Lyell accused current SBTS professor Dr. David Sills (Sills) of sexual misconduct and assault (all unwanted) over a period of years during Lyell's tenure at SBTS. Lyell apparently did work at Dr. Sills' home from time to time, which is where the bulk of the alleged misconduct occurred.
- RAM asked Lyell the following questions:
 - What do you want SBTS to do? Lyell: protect the gospel and the ministry of SBTS; protect Sills' family.
 - Do you need protection from any legal authorities? Lyell: No.
 - Is there someone with you now that can protect you? Lyell: Yes.
 - Are you willing to make a face-to-face accusation? Lyell: Yes.
- Lyell got off the phone call and the other parties had brief discussion.
- RAM, Stinson, and Greenway will discuss plan going forward, including calling a meeting with Sills.

/s/ Jonathan B. Austin | May 21, 2018
SBTS007433