

IN THE CHANCERY COURT FOR DAVIDSON COUNTY, TENNESSEE

JACK PELHAM, and )  
KAY PELHAM, )  
 )  
Plaintiffs, )  
 )  
v. ) Case No. 05-2259-III  
 )  
THE NASHVILLE CHURCH, INC., )  
INTERNATIONAL CHURCHES OF )  
CHRIST, INC., HOPE WORLDWIDE, LTD., )  
and CENTRAL AND SOUTH AMERICA )  
WORLD SECTOR, INC. )  
 )  
Defendants. )

AFFIDAVIT OF WOODY NATHAN ROWE

Comes now Woody Nathan Rowe, the Affiant, who on oath deposes and states as follows:

1. My name is Woody Nathan Rowe. I reside at 629 Watson Branch Road, Franklin, Tennessee, 37064. I am over the age of eighteen. I have personal knowledge of the matters stated herein.
2. I am the Financial Administrator of The Nashville Church, Inc. (The Nashville Church). I have served in that capacity since May 15, 1996. I also serve as the Church treasurer. I am the custodian of financial records.
3. The Plaintiff Jack Pelham and Plaintiff Kay Davis (now Pelham) joined The Nashville Church in late 1998. The financial records of The Nashville Church, Inc. reflect that Plaintiff Kay Davis Pelham first made a recorded financial donation on 12/9/98. In 1998,

Plaintiff Jack Pelham's first recorded contribution was on 10/21/98.

4. Plaintiff Kay Davis Pelham's last recorded donation was 8/29/01. Plaintiff Jack Pelham's last recorded donation was on 8/08/01. I believe they married in late 2001 and moved to the Atlanta, Georgia area. It was and is our Church practice to remove person's names from our membership roster when the person no longer lives in the area or no longer attends our Church.
5. During the timeframe of 12/09/98 through 8/29/01, Plaintiff Kay Davis Pelham made donations to the Nashville Church, that can be documented through checks that she wrote and that were recorded, or cash donations for which a receipt was given. The records reflect that she gave \$2,750.00 to "Special Missions", and \$30.00 to "Benevolence" or "Contributions for the Poor" for Honduran relief.
6. With respect to Plaintiff Jack Pelham, covering the timeframe of 10/21/98 through 8/08/01, Mr. Pelham made donations that can be documented through checks that he wrote and that were recorded, or cash donations for which a receipt was given. The Nashville Church records reflect that he gave \$3,260.00 to "Special Missions", and \$221.00 to "Benevolence" or "Contributions for the Poor" for Honduran relief.

Further Affiant saith not.

Dated this the 16<sup>th</sup> day of September, 2005.

Woody Nathan Rowe  
Woody Nathan Rowe

STATE OF TENNESSEE            )  
COUNTY OF Davidson         )

Sworn to and subscribed before me on  
this the 16<sup>th</sup> day of September, 2005.

Notary Public Brenda Wright

My commission expires: July 25, 2009

