

**EXHIBIT "C"**

40456

Mercy Gomez

**From:** William Summers  
**Sent:** Thursday, December 23, 2010 12:49 PM  
**To:** 'Ira Leesfield'; fhasty@wickersmith.com; ggaebe@gaebemullen.com; William Reese; Kevin Franz  
**Cc:** Mercy Gomez  
**Subject:** RE: Adelman

Ira,

[REDACTED]

[REDACTED]

[REDACTED]

Your letter of 12/9 over-reaches our discussion topics, significantly.  
BSA producing witnesses on hiking, trekking and the associated first aid and emergency procedures is a reasonable request.  
 Producing witnesses on every activity in scouting related to the outside is not.  
 In legal terms our response is: Objection, overbroad to the extent that the instruction is impossible to comply with.

So, if you want witnesses on areas other than the areas underlined, then give me a specific topic related to the hike of 2009.

As for the second page of your 12/9 letter, it primarily lists items not discussed in the conference call. The top paid executive in BSA, Mr. Robert Mazuca, has no first hand information on the issues in this case and will not be produced. I anticipate that the head of Health and Safety will be produced. The topics as underlined above are relevant as are the topics on scouting organization, the selection and training of scout masters, and the information maintained by BSA on individuals active in Scouting.

Sincerely,  
 Bill Summers