

EXHIBIT "D"

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December 30, 2010

Via telecopier 305-854-8266

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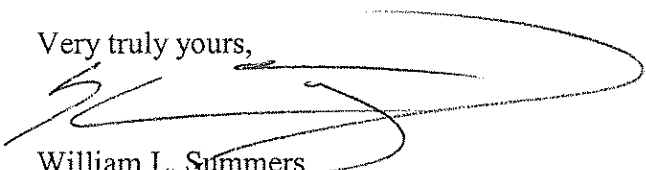
RE: Adelman, Howard & Judith Sclawy as Co-PR/Michael Adelm v BSA
Our File No. : 40756

Dear Mr. Leesfield:

We mentioned in open court yesterday that we would provide a list of reasonable areas of inquiry for our clients' corporate representative depositions. As we indicated in writing a week ago, your list was overbroad in asking for witnesses with knowledge of every outdoor scout-related activity. The areas of inquiry pertinent to the issues in this case are hiking, trekking and first aid procedures. Kindly tailor your Notice to reflect those areas of inquiry. Other relevant areas of inquiry include the scouting organization, the selection and training of scout masters and the information maintained by Boy Scouts on individuals active in scouting. Moreover, as mentioned previously in writing, and as discussed at the hearing, Boy Scouts executive officer, Mr. Robert Mazuca, who has no first hand information on the issues of this case, will not be produced.

Lastly, in response to your letter dated December 30, 2010, the request for cell phone records, which could include all Boy Scouts of America's representatives, is overbroad. The Judge seemed to agree. We can revisit this during our telephonic conference.

Very truly yours,



William L. Summers
Kevin D. Franz

KDF/mg