

Exhibit 2

PLAINTIFFS' DISCOVERY REQUESTS WHICH REMAIN IN DISPUTE

Plaintiffs' Request 9:

Any and all written guidelines, training manuals, checklists, policies, procedures, first aid training handbooks, manuals, or other written documents, as well as videotape and computerized materials, that provide instruction, guidance and training to Scoutmasters.

Defendants' Response:

Boy Scouts of America objects to this request as overly broad, burdensome and that it requests information entirely irrelevant to the issues involved in this case. Without waiving this objection, Boy Scouts of America states that the following original materials are available at the office of its attorneys for inspection:

"Guide to Safe Scouting," "Boy Scout Handbook," "The Troop Committee Guidebook," "BSA Field Guide," "The Scoutmaster Handbook," "Hiking Merit Badge Book," and "First Aid Merit Badge Book." Available on line is the Hazardous Weather Training Course.

Plaintiff's Request 10: Any and all documentation, correspondence, memoranda, records or notes regarding complaints made by any individual, entity or agency (whether public or private) relative to boy scouts hikes for the past 20 years.

Defendants' Response: Boy Scouts of America objects to this request as overly broad, a request for 20 years of items, as it is unduly burdensome, unduly vague and ambiguous, not likely to lead to the discovery of admissible evidence, not limited to scope and as potentially protected as privileged due to the request for private documents. To the extent that the request is intended to encompass materials related to claims for injury or compensation then BSA asserts its work product and attorney/client privileges.

Note: In discussions with Defendants' counsel, Plaintiffs' agreed to limit this request to the **five year** period prior to Michael Sclawy-Adelman's death, and only as to complaints involving death or illness serious enough to require medical care due to heat related causes, exposure to the elements and/or exertional activities from outdoor activities.

Note: Subsequently, the Defendants modified their position as reflected by the correspondence attached as Exhibit "2" hereto to provide:

Plaintiffs' Request 16: A copy of any and all complaints filed against the Defendant Boy Scouts of America relative to scouts injured or killed on boy scout related hikes over the past 20 years.

Defendants' Response: Boy Scouts of America objects to the 20 years span of this request as overly broad, unduly burdensome, vague and ambiguous, not likely to lead to the discovery of admissible evidence, not limited in scope.

Note: In discussions with Defendant's counsel, as with Request No. 10 above, the Plaintiffs' agreed to limit this request to complaints involving death or illness serious enough to require medical care, due to heat related causes, exposure to the elements and/or exertional activities from outdoor activities over the **five year** period prior to the subject incident up to the present.

Note: Subsequently, the Defendants modified their position as reflected by the correspondence attached as Exhibit "2" attached hereto, as follows: "As to number 16, BSA/SFC seeks to limit the request to litigation initiated in the past 5 years against BSA/SFC that stem from serious heat related illnesses and heat related deaths from a BSA/SFC "hiking" activity."

Plaintiffs' Interrogatory 9: Please state whether Defendant Boy Scouts of America has ever been a party, either plaintiff or defendant, in a lawsuit other than the present matter within the last 20 years relating to allegations of negligence resulting in injuries or death to boy scouts while participating in hikes and hiking activities. If so, state whether this defendant was the plaintiff or defendant, the nature of the action, and the date and court in which such suit was filed.

Defendants' Response: BSA objects to the overly broad twenty year time frame and the request for information regarding injuries or death which are unrelated to the claimed cause of death in this case, a heat related problem. Moreover, BSA objects because the interrogatory is not likely to lead to the discovery of relevant evidence, it is not limited in scope, it is unduly burdensome and harassing.

Plaintiffs' Interrogatory No. 10: Please state whether Defendant Boy Scouts of America has ever been a party, either plaintiff or defendant, in a lawsuit other than the present matter within the last 20 years relating to allegations of negligence resulting in injuries or death to boy scouts while participating in outdoor activities. If so, state whether this defendant was the plaintiff or defendant, the nature of the action, and the date and court in which such suit was filed.

Defendants' Response: BSA objects to the overly broad twenty year time frame and the request for information regarding injuries or death which are unrelated to the claimed cause of death in this case, a heat related problem. Moreover, BSA objects because the interrogatory is not likely to lead to the discovery of relevant evidence, it is not limited in scope, it is unduly burdensome and harassing.