

EXHIBIT 1

08-16-2016

66450-3/ea

THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division

HOWARD ADELMAN and JUDITH
SCLAWY-ADELMAN, as Co-Personal
Representative of the Estate of
MICHAEL SCLAWY-ADELMAN,

CASE NO. 1:10-cv-22236-ASG

HONORABLE ALAN S. GOLD

Plaintiffs,

v.

BOY SCOUTS OF AMERICA, THE
SOUTH FLORIDA COUNCIL, INC.;
BOY SCOUTS OF AMERICA;
PLANTATION UNITED METHODIST
CHURCH; HOWARD K.
CROMPTON, individually; and
ANDREW L. SCHMIDT, individually,

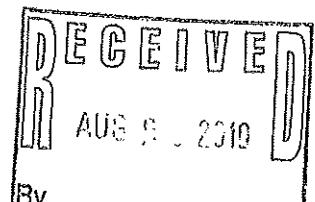
Defendants.

**DEFENDANT, HOWARD K. CROMPTON'S NOTICE OF SERVING ANSWERS
TO PLAINTIFFS' INITIAL INTERROGATORIES**

NOTICE IS HEREBY GIVEN that Answers to the Interrogatories propounded to,
Defendant, HOWARD K. CROMPTON, by Plaintiff, HOWARD ADELMAN and
JUDITH SCLAWY-ADELMAN, as Co-Personal Representative of the Estate of
MICHAEL SCLAWY-ADELMAN, served with the Summons and Complaint have been
furnished to: all counsel of record on date shown below.

WE HEREBY CERTIFY that a true copy of the foregoing was mailed this 16th
day of August to all parties on the attached service list.

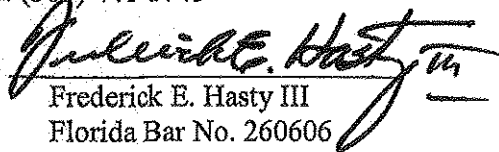
WICKER, SMITH, O'HARA, MCCOY &
FORD, P.A.
Attorney for Howard K. Crompton and
Andrew L. Schmidt
Grove Plaza, 5th Floor



CASE NO. 10-32346 CA 22

2900 S.W. 28th Terrace
Miami, FL 33133
Phone: (305) 448-3939
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By:


Frederick E. Hasty III
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Douglas Centre, Suite 304
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Coral Gables, FL 33134

Greg M. Gaebe, Esquire
Gaebe, Mullen, Antonelli, Esco & DiMatteo
420 South Dixie Highway, 3rd Floor
Coral Gables, Florida 33146

off his feet. We asked him to rest. He agreed to lie down for a while. We elevated his feet and continued observing him. He also drank more water from his Camelbak. We asked him how he felt and he said that he felt a little dizzy. We then poured water on Michael's head to see if that would make him feel better. Michael was asked and did drink water from his supply. Andy and I talked to him and observed him. He said that he wanted to continue the hike. He stood up on his own and wanted to continue the hike, but then he felt dizzy again and told us that. He was advised to lie back down which he did. We observed Michael and asked him to rest. Michael spit up. We decided that Andy should follow Chase and Kris on down the trail to tell the park ranger what was happening with Michael, and where Michael and I were located on the trail. Some time later Michael's breathing changed and he started snoring. Suddenly, he quit breathing. I called 911 on my cell phone to advise them that Michael had quit breathing. I immediately started CPR on Michael. I continued giving CPR until the Rescue personnel arrived. I was with Michael until he was placed in the helicopter to be taken to the Hospital. The paramedics said I had performed CPR appropriately.

During the hike, the scouts knew to drink fluids and eat. At no time did Michael complain of being too hot, too tired or feeling sick. Michael was the leader after the 10 mile mark on the trail, and continued to lead the hike until his speech changed. The Scouts were advised before the hike of the need to drink fluids and water. Michael had already done a 5 mile and a 10 mile hike. Michael arrived prepared and gave every indication that he was enjoying the hike. Michael's decision to participate in the hike was strictly voluntary but necessary for him to be eligible to become an Eagle Scout. Michael was an intelligent young man. He communicated well with us.

4. Describe in detail each act or omission on the part of any party to this lawsuit that you contend constituted negligence that was a contributing legal cause of the incident in question.

ANSWER: None known at this time. Discovery has not begun.

5. Do you contend any person or entity other than you is, or may be, liable in whole or part for the claims asserted against you in this lawsuit? If so, state the full name and address of each such person or entity, the legal basis for your contention, the facts or evidence upon which your contention is based, and whether or not you have notified each such person or entity of your contention.

ANSWER: Not at this time.

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6. State the full name, address and telephone number of each person, known to you or your attorneys, who has any knowledge regarding any of the issues of this lawsuit, and indicate which of these persons are eyewitnesses. For each person identified, specify the subject matter about which the witness has knowledge, and if a statement was obtained from that person, the date or dates said statements were obtained, the name, address, employer and job classification of the person taking said statement, the name, address, employer and job classification of all persons present at the taking of said statement, and the name, address, and job classification of the person having custody or control of the original statement, recording or transcript of said statement.

ANSWER: Objection. The Defendant objects to this interrogatory on the grounds that it is unduly burdensome and harassing. Subject to, and without waiving said objection, the Defendant states:

The Defendants and the Plaintiffs.

Investigator Kevin P. O'Neill – Major Crimes Investigator
Sheriff's Office
Collier County
Naples, Florida

Chase Howard Crompton – Scout on Hike
10349 NW 2nd Court
Plantation, FL 33324

Kristopher Lee Leon – Scout on Hike
Address Unknown.

Ed Clark
United States Park Ranger

Sergeant Wrobleski
Collier County Sheriff's Office
Naples, Florida
(O'Neill's supervisor)

Brian Reeds – Family friend of Adelman's
Address Unknown.

Ranger Schreffler
(239) 340-0121

Chase Crompton (son of Howard Crompton)

Collier County 911 Dispatcher – name unknown.

Responders whose names are not known by me.

7. State the name and address of every person known to you, your agents, or your attorneys who has knowledge about, or possession, custody or control of, any model, plat, map, drawing, motion picture, videotape, or photograph pertaining to any fact or issue involved in this controversy; and describe as to each, what item such person has, the name and address of the person who took or prepared it, and the date it was taken or prepared.

ANSWER: GPS and the Park Service Rangers who refuse to release the GPS owned by Howard Crompton.

This Defendant is in possession of 7 photographs taken on May 9, 2009, during the hike.

8. Have you made an agreement with anyone that would limit that party's liability to anyone for any of the damages sued upon in the case? If so, state the terms of the agreement and the parties to it.

ANSWER: No agreement to limit my liability after the hike occurred on May 9, 2009.

9. Please state if you have ever been a party, either plaintiff or defendant, in a lawsuit other than the present matter, and, if so, state whether you were plaintiff or defendant, the nature of the action, and the date and court in which such suit was filed.

ANSWER: To the best of my knowledge not me personally but businesses I have been involved in have had lawsuits involved with business disputes.

10. Have you ever been convicted of a crime, other than any juvenile adjudication, which under the law under which you were convicted punishable by death or imprisonment in excess of one (1) year, or that involved dishonesty or a false statement, regardless of the punishment? If so, state as to each conviction, the specific crime, the date and the place of conviction.

ANSWER: No.

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11. Identify by name, address, telephone number, title/job description the person or persons who were responsible for coordinating and preparing for the 20 mile hike on May 9, 2009.

ANSWER: I was responsible for coordinating the hike with Andrew L. Schmidt as voluntary scout leaders.

12. Did you or anyone else provide any verbal or written instructions, manuals or warnings to minor Michael Sclawy-Adelman, and/or his parents, prior to the 20 mile hike on May 9, 2009; and relating to said hike? If so, specify in detail what was provided, to whom it was provided, how it was provided, and when it was provided.

ANSWER: Yes. E-mail was sent before the hike. Verbal instructions were given about preparation for the hike before the day of the hike. The Scouts were advised about bringing food and water. Michael was provided the Boy Scouts hiking merit badge book. Michael was reminded of the need to bring and drink plenty of water during the hike. Rests were taken during the hike.

13. Please list and describe all equipment, survival gear, safety equipment, to include communications equipment, taken on the 20 mile hike on May 9, 2009.

ANSWER: Cellphones, a GPS, water and hiking food were brought on the hike in addition to the information about the Florida Trail.

14. List and provide a description of any and all verbal, oral or written training and instruction relative to hiking that you received prior to the subject hike on May 9, 2010. In doing so, state when you recorded said training and instruction, and from whom you received said instruction.

ANSWER: Instruction on hiking was given at the Scoutmaster training weekend I attended in 2008 which was put on by the Pine Island District of the Boy Scouts. I do not remember who taught the course. First aid was discussed as well. There are other sources but I cannot identify all of them including word of mouth, advice and training.

15. Were any photographs or videotapes taken by you or anyone else during the subject hike? If so, state who took said photographs or videotape, what said photographs or videotape purport to show, and who is in possession of the photographs and/or videotapes.

ANSWER: Yes. I took 7 photographs during the hike.

16. Were you or anyone else using any type of global positioning system device during the subject hike? If so, provide the make and model, as well as the current location of said device.

ANSWER: Yes. My GPS device is being held by the National Park Service.

17. Were you in possession of a cellular phone or any other communication device during the subject hike? If so, provide the cellular phone number, or any other number associated therewith, as well as the name of the service provider.

ANSWER: Yes. Objection is made to this Request due to privacy rights of Howard Crompton. Short of a confidentiality agreement, this number will not be released.

18. Prior to the subject hike, did you review any weather related information? If so, list the sources of all weather information that you reviewed, and the state when you reviewed said information.

ANSWER: I watched the weather report that morning on the local news.

19. List all positions that you have held with any scouting organization and the dates you held these positions.

ANSWER: I began as a volunteer with the Boy Scouts in 2007. I became Committee Chairman from November 2007 until December 2008. I have been a Scout Master from January 2009 until present.

20. Have you ever received a grievance or complaint, whether written or oral, from the parent or guardian or any scout as it relates any scouting activity? If so, state the nature of the grievance or complaint, when it was made, and the full name of the person who made the complaint or grievance.

ANSWER: No.

21. List and describe any and all text books, manuals, guidelines, written materials, videotape material, or computer related material that you have reviewed as it relates to hiking.

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ANSWER: The Boy Scouts hiking merit badge book, and the Boy Scouts Scout Master handbook. Objection. Overbroad, vague and calls for speculation. In addition, verbal instructions from other Scout Masters, the Guide to Safe Scouting, and other materials I cannot remember.

22. List and describe any and all text books, manuals, guidelines, written materials, videotape material, or computer related material that you have reviewed as it relates to handling emergency medical situations, such as heatstroke.

ANSWER: The Boy Scouts hiking merit badge book, and the Boy Scouts Scout Master handbook. I was also trained in CPR. Other First Aid and CPR materials were known by me but cannot be listed here.

23. Did you, or anyone to your knowledge, seek permission or authorization from any person or entity to conduct the subject hike? If so, state the name of the person(s) or entity(ies) from whom you sought permission or authorization, when that permission or authorization was sought, and the result of your request.

ANSWER: I called Andy and he told me that he had a tour permit filled out. When we got to the Park we filed a permit request to get on the trail.

24. Did you or anyone to your knowledge, obtain a permit for the subject hike? If so, from whom was said permit obtained, and when?

ANSWER: The Park gave us a permit to be on the trail.

25. List by name and description any and all training and instruction pertaining to scouting that you have received, whether through written material, videotape material, or computerized material.

ANSWER: I received Scout Master leader-specific training by the Pine Island District. I completed a youth protection online course by Boy Scouts of America, which covered youth protection policy, kinds of abuse, signs of abuse, how to respond to disclosure of abuse, and proper reporting procedures. See other answers above.

26. List by name and description any and all training and instruction pertaining to serving as a Scoutmaster that you have received, whether through written material, videotape material, or computerized material.

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ANSWER: I received Scout Master leader specific training by the Pine Island District. I completed a youth protection online course by Boy Scouts of America, which covered youth protection policy, kinds of abuse, signs of abuse, how to respond to disclosure of abuse, and proper reporting procedures. I also relied upon the Scout Master handbook, the Merit Badge books, word of mouth advice and other sources I may not remember.

27. List the names, business address, dates of employment and rates of pay regarding all employers, including self-employment, for whom you have worked in the past ten (10) years.

ANSWER: Objection. The Defendant objects to this request on the grounds that it is overly broad as to subject-matter scope, as the rates of pay earned by this Defendant during any period of time is not reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving said objections, the Defendant states:

I have worked for Crompco, Inc., d/b/a Parkrow Printing. We are in the printing business. I have worked for the company for almost 25 years.

The address is:
6531 North West 13th Court
Plantation, FL 33313

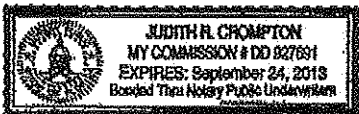
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Howard K. Crompton

STATE OF FLORIDA)
COUNTY OF Broward) SS.

The foregoing instrument was acknowledged before me this 30 day of July, 2010, by Howard K Crompton who is personally known to me or who has produced _____ and who did take an oath.

S
E
A
L




Signature of person taking acknowledgment

Name of officer taking acknowledgment

Title or rank

Serial number