

EXHIBIT 2

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.

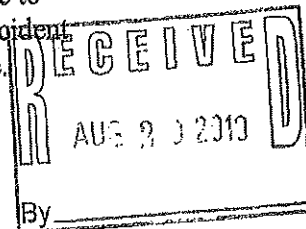
**DEFENDANT, HOWARD K. CROMPTON'S RESPONSE TO PLAINTIFFS'
FIRST REQUEST FOR PRODUCTION**

Defendant, HOWARD K. CROMPTON, by and through the undersigned attorneys, and pursuant to the applicable Fla. R. Civ. P., responds to Plaintiffs', HOWARD ADELMAN and JUDITH SCLAWY-ADELMAN, as Co-Personal Representative of the Estate of MICHAEL SCLAWY-ADELMAN First Request for Production served with the Summons and Complaint as follows:

1. Any and all photographs, videotapes, charts, maps, and other documentary evidence relative to the subject hike.

RESPONSE: Available for inspection at office of undersigned counsel.

2. Any and all insurance policies that may provide benefits or coverage to this defendant for any claimed injury or damage from the subject incident or occurrence, including any umbrella or excess insurance coverage.



RESPONSE: By prior agreement with Plaintiffs, information relating to the subject of this interrogatory will be provided at a later date.

3. Any and all statements of plaintiff(s), plaintiffs' agents and employees, or plaintiff's witnesses; and defendant(s), defendants' agents and employees; bearing on knowledge of facts relevant and material to the claims and defenses in the instant litigation.

RESPONSE: No statements of Plaintiffs have been taken by this Defendant. Defendant has no employees.

4. Any and all weather data that you received, prior to and during the subject hike.

RESPONSE: None.

5. Any permits received relative to the subject hike.

RESPONSE: A Florida Trail permit was obtained.

6. Any applications for permits relative to the subject hike.

RESPONSE: None.

7. Any notification provided to National Park Service personnel or officials relative to the subject hike through the "The Florida Trail" in the Big Cypress National Park of the Florida Everglades on May 9, 2009.

RESPONSE: No documents in my possession.

8. Any and all written guidelines, training manuals, checklists, policies, procedures, first aid training handbooks, manuals, or other written document, as well as videotape and computer materials that provided instruction, guidance or training that you reviewed prior to the subject hike.

RESPONSE: I have my personal copy of the Scout Master handbook, and a copy of our troop's hiking merit badge book. These can be made available for inspection at the office of the undersigned counsel.

9. Any and all documentation, correspondence, memoranda, records or notes regarding complaints made by any individual, entity or agency

(whether public or private) regarding your performance as a Scoutmaster at any time.

RESPONSE: None. And, I am aware of no complaints by anyone regarding my performance as a Scoutmaster until this lawsuit.

10. Any global positioning system and maps that you used during the subject hike.

RESPONSE: I believe my GPS device is being held by the National Park Service who will not return it to me.

11. Any written notes or checklists that you used during the subject hike.

RESPONSE: None.

12. Any written documents that you disseminated to Michael Sclawy-Adelman or his patents, relative to the subject hike.

RESPONSE: An e-mail was sent to the Scouts before the hike took place pertaining to preparing for the hike. I don't have a copy of the e-mail.

13. Any and all written, videotape, or computerized material that you have received or reviewed relating to scouting.

RESPONSE: Objection. The Defendant objects to this request on the grounds that it is overly broad, vague and ambiguous as to the phrase "relating to scouting." Subject to, and without waiving said objections, the Defendant states: 1. The Guide to Safe Scouting, the Hiking Merit Badge book and the Scout master handbook can be made available for inspection.

14. Any and all written, videotape, or computerized material that you have received or reviewed relating to serving as a Scoutmaster.

RESPONSE: None in my possession.

15. Any and all written, videotape, or computerized material that you have received or reviewed relating to emergency medicine.

RESPONSE: Objection. The Defendant objects to this request on the grounds that it is overly broad, vague and ambiguous as to the phrase "relating to emergency medicine." Subject to, and without waiving said objection, see Response to 13 above which overlaps this Response.

16. Any and all complaints, grievances, disciplinary notices, warnings, admonishments, or the like that you have received from any source relative to your service as a Scoutmaster.

RESPONSE: None.

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

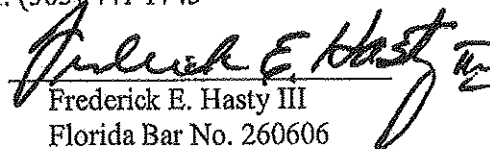
2900 S.W. 28th Terrace

Miami, FL 33133

Phone: (305) 448-3939

Fax: (305) 441-1745

By:



Frederick E. Hasty III

Florida Bar No. 260606

fhasty@wickersmith.com

Service List

Mark A. Sylvester, Esquire
Leesfield & Partners, P.A.
2350 South Dixie Highway
Miami, FL 33133

William S. Reese, Esquire
Lane, Reese, Summers, Ennis & Perdomo
Douglas Centre, Suite 304
2600 Douglas Road
Coral Gables, FL 33134

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