

EXHIBIT 2

66450-3

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, ANDREW L. SCHMIDT'S RESPONSE TO PLAINTIFFS' FIRST
REQUEST FOR PRODUCTION

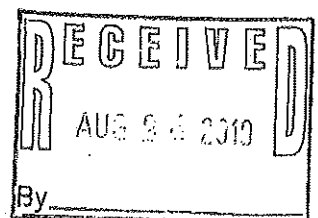
Defendant, ANDREW L. SCHMIDT, by and through the undersigned attorneys,
and pursuant to the applicable Fla. R. Civ. P., responds to Plaintiffs' First Request for
Production served with the Summons and Complaint as follows:

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

RESPONSE: None found after a search has been made.

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 reduced to writing or printing.

5. Any permits received relative to the subject hike.

RESPONSE: A Park Service Use Permit was obtained and is attached.

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: See 5 above.

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: There is no list to respond to this request. Objection is made to the scope of this request because it is overbroad and burdensome. This Defendant cannot readily respond by recalling and categorizing all of the information that has been reviewed, read, provided, or seen in his years of scouting. In good faith, I have my personal copy of the Scout Master handbook, and a copy of our troop's hiking merit badge book and other Boy Scout handbooks which do not even pertain to hiking. 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 in my possession.

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

RESPONSE: I believe Howard's GPS device is being held by the National Park Service who will not return it to him.

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. Also attached is a Hiking Schedule for 2008-2009 and Hiking Merit Badge Notes.

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: This Defendant has no such list of materials he has seen, reviewed, studied or been supplied. Objection is made as being overbroad, burdensome and harassing.

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: No such documents.

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



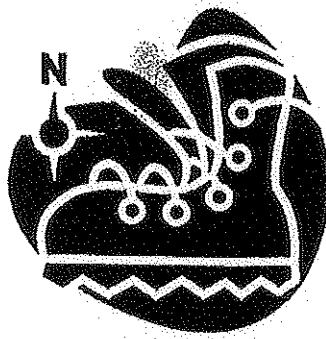
U.S. DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
BACKCOUNTRY USE PERMIT

The visitor must have this permit during the visit.

When signed, this single-visit permit authorizes:

NAME	D. S. P. T. S. P. 11																																	
ADDRESS	Fryberg - Chamcook																																	
CITY																																		
To visit	Trail - 10 days																																	
Give best estimate of start and finish dates	THROUGH	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31		
	MOONDAY																																	
	EQ/DAY																																	
Location of entry	Des 11																																	
Location of exit	Des 11																																	
Primary method of travel	Hike																																	
Number of people in group	5																																	
Number of pack or saddle stock	2																																	
Number of watercraft or other craft	0																																	
CAMP/SITE NAME	PITNEY - 10 miles																																	
	Fryberg - Chamcook																																	
	Wooded Clearing																																	
	Michael S. McPherson																																	
ISSUING OFFICER'S SIGNATURE	R. J. 1022																																	
	Chase Cropp																																	
VISITOR'S SIGNATURE	D. S. P. T. S. P. 11																																	
DATE	7/1/85																																	
NIGHTS	77																																	
	78																																	

FASTEN THIS TAG TO YOUR PACK, SADDLE, BOAT OR TENT



Hiking Schedule for 2008-09

(Merit Badge completion)

You must complete 5 of the first 6 and #7 to complete the badge. Any previous hikes can be counted. All hikes require a minimum of 2 scouts and 2 adults (1 counselor)

Counselors: Mr. Schmidt, Mr. Crompton, Mr. Beals

November 22nd – Hike #1
Old Cutler Hike (Miami), 13 miles

January 31st- Hike #2
Conservation Dike from Markham Park, 10 miles

March 21st- Hike #3
Highlands Hammock (our campout), 10 miles

April 11th- Hike #4
Everglades National Park trail, 10 miles

April 18th- Hike #5
Location TBA, 10 miles

April 25th- Hike #6
On our campout, 10 miles

May 9th – Hike #7
Florida Trail in Big Cypress Preserve (Oasis Ranger Station on Tamiami Trail north 10 miles and return), 20 miles



Hiking Merit Badge Notes

- You must read the hiking merit badge book
- Previous hikes (verified) can be counted and recorded
- Do not wear NEW sneakers or hiking boots
- You can use a small backpack for water bottles or purchase a camelback (available at Outdoor World)
- Remember your scouts account is good for any scout gear so that includes hiking boots and Camelbacks but not sneakers.
- Orientation for this merit badge is Wednesday, March 4th