

LANE REESE SUMMERS ENNIS & PERDOMO, P.A.

ATTORNEYS AT LAW
 SUITE 304, DOUGLAS CENTRE
 2800 DOUGLAS ROAD
 CORAL GABLES, FLORIDA 33134
 (305) 444-4418

TELECOPIER (305) 444-5504
 OFFICE@LANERESE.COM

WILLIAM S. REESE
 WILLIAM L. SUMMERS
 J. DANIEL ENNIS
 LUIS J. PERDOMO
 ELIZABETH A. BOAN
 KEVIN D. FRANZ
 KIMBERLEY S. BROWN

FRANK A. LANE
 OF COUNSEL
 GEORGE O. MITCHELL
 OF COUNSEL
 FLORIDA BAR BOARD CERTIFIED
 ADMIRALTY & MARITIME LAW

C. PAGE LANE
 OF COUNSEL

January 26, 2011

Robert Peltz
 Patricia Kennedy
 Leesfield & Partners
 2350 S Dixie Hwy
 Miami, FL 33133

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

Dear Bob and Patricia:

It was a pleasure speaking with you yesterday in an attempt to work out discovery disputes. This represents what we agreed upon and what we could not agree upon. If this does not represent your understanding of our conversation, please let me know.

Notice of Deposition Duces Tecum (BSA and SFC)

Schedule A

- Plaintiffs agree that community related emergencies are unnecessary. Plaintiffs only seek information pertaining to first aid related emergencies. Plaintiffs wish to limit the scope to activities involving physical exertion and exposure to elements. BSA and SFC object and seek to limit the same in solely to hiking, trekking, and first aid.
- Plaintiffs and BSA/SFC maintain the same positions for numbers 2, 5 and 6.
- Plaintiffs agreed to limit # 3 to first aid emergency situations.
- As to number 11, Plaintiffs seek a corporate representative with knowledge about the organizational structure, the different types of scouting and who is responsible for running those areas, the policies and guidelines of BSA/SFC, the manuals that define each levels responsibilities. I indicated that I would get back to you as to whether we still object or



January 26, 2011
Page 2

would agree to this area of inquiry.

- As to number 12, BSA/SFC agrees to producing a representative with knowledge of lawsuits concerning heat related serious illnesses and/or deaths stemming from hiking activities within the past five years. Plaintiffs maintain their request number 12 is valid.
- As to number 14, BSA/SFC object to the request, but this office will request from BSA/SFC documentation it possesses concerning heat related incidents occurring during the 2005 Jamboree. We will try to accomplish this within 10 business days.
- As to number 19, I believe the parties agreed to limit the area of inquiry to scouts who died or who required medical assistance (from a doctor or EMT) as a result of exposure to heat or dehydration. However, BSA/SFC seeks to limit this to the past five years and to hiking only as we discussed throughout the conversation.

Schedule B

- For items 1, 2, 3, 4, 5, 6, and 7, BSA/SFC seeks to limit the records to hiking, trekking and first aid. Plaintiffs believe it should include all outdoor activities that could involve physical exertion and/or involve the elements of nature.
- For item 12 Plaintiffs agree only to limit the request to those phones that are paid for by BSA and SFC. BSA / SFC wishes to limit the request to calls made to or received from Plaintiffs on May 9, 2009.

Notices of Deposition Duces Tecum (named SFC representatives)

- As to number 1, SFC wishes to limit the inquiry to the particular deponent's communications with Troop 111 concerning Michael and the hike dating back to January 1, 2009. Plaintiffs would not change the request other than to limit it to the past three years.
- As to number 3, SFC wishes to limit the inquiry to the particular deponent's communications with Crompton or Schmidt concerning Michael and/or the hike dating back to January 1, 2009. Plaintiffs would not change the request other than to limit it to the past three years.
- As to number 6, SFC wishes to limit the inquiry to the particular deponent's communications with Crompton or Schmidt concerning Michael and the hike dating back to January 1, 2009. Plaintiffs would not change the request other than to limit it to the past three years.
- As to number 13, I believe the parties agreed that the request would be subject to the privilege log previously produced as well as the upcoming supplemental privilege log.

January 26, 2011
Page 3

- Plaintiffs would not agree to limit number 19 in any way. SFC believes it is vague, ambiguous, overbroad, a fishing expedition. SFC would be willing to limit it to documentation regarding lawsuits brought by any individual over the past 5 years concerning heat related serious illnesses/death.
- Plaintiffs agree to limit request 25 only to the past 5 years involving outdoor activities that require physical exertion. SFC request to limit it to lawsuits in the past 5 years stemming from heat related serious illness/death on hikes.

BSA/SFC's Responses to Requests for Production

- As to number 1, BSA/SFC will review the documents it claims privileged and amend the privilege log if possible to include (1) the preparer of the document(s), (2) the purpose for which it was prepared and (3) will provide a more specific description of the document(s) to the extent possible.
- As to number 2, BSA/SFC provided primary and excess levels of insurance coverage up to approximately \$10 millions. BSA/SFC objects to producing further insurance policies to the extent they exist.
- As to number 3, BSA/SFC agrees to provide a better response
- As to number 4, BSA/SFC will amend the privilege logs to the extent possible
- As to 5-8 and 12-15, BSA/SFC already provided valid responses. However, as discussed these responses represent the complete and full responses from BSA/SFC.
- As to number 9, the response given encapsulates the additional requests made through the January 19, 2011 letter to the best of our knowledge.
- As to number 16, BSA/SFC seeks to limit the request to litigation initiated in the past five years against BSA/SFC that stem from serious heat related illnesses and heat related deaths from a BSA/SFC hiking activity. Plaintiffs seek to limit the request to litigation initiated in the past five years against BSA/SFC that stem from heat related illnesses, heat related death from any outdoor related activity that involves physical exertion and/or the elements of nature.
- As to numbers 17, 18, BSA/SFC will provide a better response.

BSA/SFC's Answers to Interrogatories

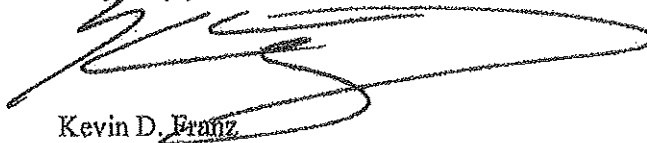
January 26, 2011

Page 4

- BSA/SFC agree to amend its answer to number 7.
- As to number 9, BSA/SFC seeks to limit the request to litigation initiated in the past five years against BSA/SFC that stem from serious heat related illnesses and heat related deaths from a BSA/SFC hiking activity. Plaintiffs seek to limit the request to litigation initiated in the past five years against BSA/SFC that stem from heat related illnesses, heat related death from any outdoor related activity that involves physical exertion and/or the elements of nature.
- As to number 10, BSA/SFC seeks to limit the request to litigation initiated in the past five years against BSA/SFC that stem from serious heat related illnesses and heat related deaths from a BSA/SFC hiking activity. Plaintiffs seek to limit the request to litigation initiated in the past five years against BSA/SFC that stem from heat related illnesses, heat related death from any outdoor related activity that involves physical exertion and/or the elements of nature.
- BSA/SFC agree to amend its answer to number 11.

BSA/SFC will move for a protective order regarding the notices of deposition no later than February 2, 2011. BSA/SFC will represent through such motions the concessions made by both parties despite the inability to reach an agreement. Plaintiffs will move to compel better answers/responses no later than February 5, 2011. Plaintiffs will represent through such motions the concessions made by both parties despite the inability to reach an agreement. BSA/SFC will provide better answers and an amended privilege log as indicated above by February 10, 2011.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kevin D. Franz", written over a horizontal line.

Kevin D. Franz

KDF/mg

Exhibit 2