

40756

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

Howard Adelman and Judith
Sclawy-Adelman,
as Co-Personal Representatives of
The Estate of Michael Sclawy-Adelman,

Plaintiffs,

CASE NO: 1:10-CV-22236-ASG
Magistrate: ALAN S. GOLD

vs.

Boy Scouts of America, a Foreign
Corporation;
The South Florida Council Inc.,
Boy Scouts of America;
Plantation United Methodist Church;
Howard K. Crompton, individually; and
Andrew L. Schmidt, individually,

Defendants.

AFFIDAVIT OF RICHARD BOURLON

STATE OF TEXAS)
)ss
COUNTY OF Dallas)

BEFORE ME, the undersigned authority, on this day personally appeared, RICHARD BOURLON, who after being first duly sworn, under oath, certifies that the statements set forth in this Affidavit are true to the best of his information and belief and upon personal knowledge and says:

1. My name is Richard Bourlon, and I am a resident of the State of Texas. I am over eighteen years of age, and I am competent to testify in matters contained in this Affidavit.

2. I am currently employed as the Health and Safety Team Leader for Boy Scouts of America ("BSA"). I am familiar with both the operations of the BSA and the structure of the Scouting Movement.
3. I am familiar with the facts of the above-captioned lawsuit and the Risk Management Data Base maintained by the BSA Risk Management Department as part of the BSA managed claims and self insurance/insurance program.
4. I am also familiar with the document labeled as Exhibit 27, which was attached to the deposition taken of me as a Corporate Representative of the BSA.
5. For the entries labeled "Incidents," no paper files are created. The brief information reported on these Risk Management Incidences is only stored electronically and the printout produced during my deposition provided all the incident description information available to BSA.
6. The entries labeled "claims" indicate that the incident was deemed to justify the additional time and expense of further study and document gathering. A paper file was created, and in my deposition those portions of the paper, which do not contain the mental impressions of persons gathering information, were produced.
7. In all instances where an incident labeled "claim" progressed to a lawsuit, the printout, in the final column, identifies that the issue is in litigation

FURTHER AFFIANT SAYETH NAUGHT

Richard Boulton

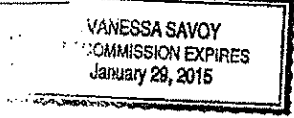
RICHARD BOURLON

STATE OF TEXAS

COUNTY OF Dallas

} SS.
)

The foregoing instrument was acknowledged before me this 13 day of April, 2011, by 2011, who is personally known to me, or who has produced ~~his~~ identification, and who did take an oath.



(Seal)

Signature of person taking acknowledgment

Vanessa Savoy
Name of officer taking acknowledgment

Notary Public
Title or rank

01006123-8
Serial number