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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 10-CV-22236-ASG

HOWARD ADELMAN AND JUDITH
SCLAWY-ADELMAN, AS CO-PERSONAL
REPRESENTATIVES OF THE
ESTATE OF MICHAEL SCLAWY-ADELMAN,

Plaintiffs,

vs.

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.

NOTICE OF DEPOSITION DUCES TECUM

PLEASE TAKE NOTICE that the undersigned attorneys will take the deposition of:

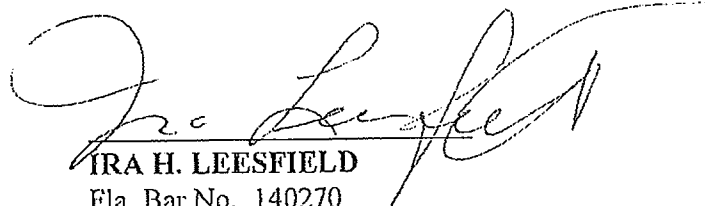
<u>DEPONENT/NAME</u>	<u>DATE AND TIME</u>	<u>PLACE</u>
ANDREW L. SCHMIDT	March 7, 2011 9:00 a.m	Law offices of Wicker, Smith et al 2800 Ponce de Leon Blvd. Suite 800 Coral Gables, Florida

Upon oral examination before an officer authorized by law to administer oaths in accordance with Rule 28 of the Federal Rules of Civil Procedure in the State of Florida at the address listed above. The oral examination will continue from day to day until completed. The deposition will be recorded *stenographically* and by *audiovisual* means. The deposition is being taken for the purpose

of discovery, for use at trial or for such other purposes as are permitted under the applicable Federal Rules of Civil Procedures.

The deponents is requested to produce documents at the deposition as set forth in Schedule A.

In accordance with the Americans with Disabilities Act, persons needing a special accommodation to participate in this proceeding should contact the ADA coordinator no later than seven days prior to the proceeding. Telephone (305) 854-4900 for assistance.



IRA H. LEESFIELD

Fla. Bar No. 140270

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 11, 2011, I served the foregoing by email and First Class U.S. Mail to the persons listed on the attached Service List.



IRA H. LEESFIELD

SERVICE LIST

HOWARD ADELMAN AND JUDITH SCLAWY-ADELMAN
VS.
BOY SCOUTS OF AMERICA, et al
CASE NO.: 10-CV-22236-ASG

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

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<p>FREDERICK E. HASTY, III WICKER, SMITH, O'HARA, MCCOY, GRAHAM & FORD, P.A. 2800 Ponce de Leon Blvd. Suite 800 Coral Gables, Florida 33134 Telephone: 305-448-3939 Facsimile: 305-441-1745 Email: fhasty@wickersmith.com <i>Attorneys for Howard K. Crompton and Andrew L. Schmidt</i></p>	<p>GREG M. GAEBE GAEBE, MULLEN, ANTONELLI & DIMATTEO 420 South Dixie Highway, 3rd Floor Coral Gables, FL 33146 305-667-0223 305-284-9844 – Fax Email: ggaebe@gaebemullen.com <i>Attorneys for Plantation United Methodist Church</i></p>

SCHEDULE A

1. All non-privileged correspondence, emails or other types of communication between this deponent and South Florida Council.
2. All non-privileged correspondence, emails or other types of communication between this deponent and Boy Scouts of America.
3. All non-privileged correspondence, emails or other types of communication between this deponent and Plantation United Methodist Church.
4. All correspondence, emails or other types of communications between South Florida Council and/or Troop 111, and/or this deponent and Michael Sclawy-Adelman or the Plaintiffs in this case.
5. All documents, materials or tangible things which relate to the responsibilities of this deponent with respect to Troop 111, and/or South Florida Council, and/or Boy Scouts of America and/or Plantation United Methodist Church.
6. The cell phone record for **May 9, 2009**, for this deponent which reflects:
 - calls to or from any defendant in this case,
 - calls to or from any employee, agent or representative of any defendant,
 - calls to or from the National Park Service,
 - calls to or from any law enforcement personnel,
 - calls to or from any person or entitywhich are in any way or manner whatsoever related to the incident at issue in this case.
7. All documents, materials or tangible things which this deponent, and/or Plantation United Methodist Church, and/or South Florida Council and/or Boy Scouts of America sent or caused to be sent to the members or parents of members of Troop 111.
8. All documents, materials or tangible things which this deponent and/or South Florida Council, and/or Plantation United Methodist Church, and/or Boy Scouts of America sent or caused to be sent to Michael Sclawy-Adelman or the Plaintiffs in this case.
9. All documents, materials or tangible things which are related to the hike of May 9, 2009.
10. All documents, materials or tangible things related to Michael Sclawy-Adelman and/or his death.

11. Any and all photographs, videotapes, charts, maps, and other documentary evidence relative to the subject hike.
12. 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.
13. Any weather data that you, or anyone associated with the Boy Scouts of America, Troop 111, South Florida Council, or the Plantation United Methodist Church received, from any source whatsoever, including any website, prior to and during the May 9, 2009 hike.
14. Any permits you or anyone associated with Boy Scouts of America, Troop 111, South Florida Council, or the Plantation United Methodist Church received relative to the May 9, 2009 hike.
15. Any applications for permits relative to the May 9, 2009 hike.
16. Any notification(s) provided to National Park Service personnel or officials relative to the May 9, 2009 hike.
17. 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 May 9, 2009 hike.
18. 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.
19. Any global positioning system and maps that you used during the May 9, 2009 hike.
20. Any written notes or checklists that you used during the May 9, 2009 hike.
21. Any written documents that you disseminated to Michael Sclawy-Adelman or his parents, relative to the May 9, 2009 hike.
22. Any and all written, videotape, or computerized material, from any source whatsoever, that you have received or reviewed relating to scouting.
23. Any and all written, videotape, or computerized material, from any source whatsoever, that you have received or reviewed relating to serving as a Scoutmaster.

24. Any and all written, videotape, or computerized material from any source whatsoever, that you have received or reviewed relating to first aid, and/or emergency procedures or guidelines, and/or emergency situations, and/or emergency medicine.
25. Any and all complaints, grievances, disciplinary notices, warnings, admonishments, or the like that you have received from any source regarding your service as a Scoutmaster.
26. Copies of any and all notes, journals, notebooks, computer entries, diaries, logs, journal entries, and memoranda, that were created by this deponent which relate in any way to Michael Sclawy-Adelman, including, but not limited to Michael Sclawy-Adelman's Boy Scouting activities.