

66450-3

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 10-CV-22236-ASG  
Magistrate Judge: Magistrate Judge Chris M. McAliley

HOWARD ADELMAN and JUDITH SCLAWY-  
ADELMAN, as Co-Personal Representative of the  
Estate of MICHAEL SCLAWY-ADELMAN,

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.

**DEFENDANTS', HOWARD K. CROMPTON AND ANDREW L. SCHMIDT,  
FIRST REQUEST FOR PRODUCTION TO PLAINTIFFS**

The Defendants, HOWARD K. CROMPTON and ANDREW L. SCHMIDT, by  
and through the undersigned counsel, and in accordance with the Federal Rules of Civil  
Procedure and the Local Rules of the Southern District of Florida, hereby serves this First  
Request for Production to Plaintiffs, as follows:

**ITEMS TO BE PRODUCED:**

1. Any and all documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, of GPS data, pertaining to the incident described in Plaintiffs' Amended Complaint.
2. Any and all documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video of any kind or description, of Interviews given by Plaintiffs, pertaining to the incident described in Plaintiffs' Amended Complaint.



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3. Any and all e-mails, materials, things, writings, notes, photographs and/or video of any kind or description, received by Michael Adelman and/or Plaintiffs, from: Troop 111, Soutmasters, Plantation United Methodist Chuch, Boy Scouts of America, and/or South Florida Council, regarding the incident described in Plaintiffs' Amended Complaint.
4. Any and all e-mails, materials, things, writings, recordings, transcriptions, notes, hotographs and/or video, of any kind or description, sent by Michael Adelman nd/or Plaintiffs, to: Troop 111, Soutmasters, Plantation United Methodist Chuch, oy Scouts of America, and/or South Florida Council, regarding the incident escribed in Plaintiffs' Amended Complaint.
5. Any and all documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, of e-mails to Michael Adelman or to Plaintiffs regarding Michael Adelman's passing.
6. Any and all documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, of sympathy cards from adult and/or youth members and/or leaders of BSA, South Florida Council, and/or Plantation United Methodist Church.
7. Any and all documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, of employment records of Michael Adelman from any time, including pay stubs and/or W-2 forms.
8. Any and all documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, of letters, notes, gifts and/or sentimental objects decedent sent to or received from Michael Adelman's significant other(s) at any time.
9. Any and all documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, of Michael Adelman's and/or Plaintiffs' involvement with Ira Abram's Eagle Court of Honor.
10. Any and all documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, of Michael Adelman's and/pr Plaintiffs' involvement with the Troop 111 Spaghetti Dinner Fundraiser.
11. True and correct copies and reproductions of all documents, materials, things, writings, recordings, transcriptions, notes, photographs, video, that were inspected at Plaintiffs' counsel's office on November 24, 2010, and that were

requested to be reproduced but have to date not yet been provided to these Defendants.

12. Any and all original documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description of which Plaintiffs now have custody and/or control, received by Plaintiffs at any time after Plaintiffs served their response to Boy Scouts of America's Request for Production, that is responsive to those same requests which Plaintiffs did not then object to.
13. Any and all original documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, pertaining to the incident described in Plaintiffs' Amended Complaint, of communications with Howard Crompton on or about May 10, 2009, as stated in Plaintiffs' Answers to Interrogatory Number 6 of The South Florida Council's Initial Interrogatories.
14. Any and all original documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, pertaining to the incident described in Plaintiffs' Amended Complaint, of communications with Andy Schmidt on or about 12/09 and 1/10, as stated in Plaintiffs' Answers to Interrogatory Number 6 of The South Florida Council's Initial Interrogatories.
15. Any and all original documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, pertaining to the incident described in Plaintiffs' Amended Complaint, of communications with Sherrill Lowey, as stated in Plaintiffs' Answers to Interrogatory Number 6 of The South Florida Council's Initial Interrogatories.
16. Any and all original documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, pertaining to the incident described in Plaintiffs' Amended Complaint, of communications with Douglas Beals, as stated in Plaintiffs' Answers to Interrogatory Number 6 of The South Florida Council's Initial Interrogatories.
17. Any and all original documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, pertaining to the incident described in Plaintiffs' Amended Complaint, of communications with Patrick Roberts, as stated in Plaintiffs' Answers to Interrogatory Number 6 of The South Florida Council's Initial Interrogatories.
18. Any and all original documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description,

- pertaining to the incident described in Plaintiffs' Amended Complaint, of communications with Linda Vedsted, as stated in Plaintiffs' Answers to Interrogatory Number 6 of The South Florida Council's Initial Interrogatories.
19. Any and all original documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, pertaining to the incident described in Plaintiffs' Amended Complaint, of communications with Rosemary Novak, as stated in Plaintiffs' Answers to Interrogatory Number 6 of The South Florida Council's Initial Interrogatories.
  20. Any and all original documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, pertaining to the incident described in Plaintiffs' Amended Complaint, of communications with Carol Henderson, as stated in Plaintiffs' Answers to Interrogatory Number 6 of The South Florida Council's Initial Interrogatories.
  21. Any and all original documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, pertaining to the incident described in Plaintiffs' Amended Complaint, of communications with Brad Schmidt, as stated in Plaintiffs' Answers to Interrogatory Number 7 of The South Florida Council's Initial Interrogatories.
  22. Any and all original documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, pertaining to the incident described in Plaintiffs' Amended Complaint, of communications with Phillip King, as stated in Plaintiffs' Answers to Interrogatory Number 7 of The South Florida Council's Initial Interrogatories.
  23. Any and all original documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, pertaining to the incident described in Plaintiffs' Amended Complaint, of communications with Sam Kent, as stated in Plaintiffs' Answers to Interrogatory Number 7 of The South Florida Council's Initial Interrogatories.
  24. Any and all original documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, pertaining to the incident described in Plaintiffs' Amended Complaint, of communications with Ira Abrams, as stated in Plaintiffs' Answers to Interrogatory Number 7 of The South Florida Council's Initial Interrogatories.
  25. Any and all original documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, pertaining to the incident described in Plaintiffs' Amended Complaint, of

communications with Jeff Hunt, as stated in Plaintiffs' Answers to Interrogatory Number 8 of The South Florida Council's Initial Interrogatories.

26. Any and all original documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, pertaining to the incident described in Plaintiffs' Amended Complaint, of communications with Rich Levenson, as stated in Plaintiffs' Answers to Interrogatory Number 8 of The South Florida Council's Initial Interrogatories.
27. Any and all original documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, pertaining to the incident described in Plaintiffs' Amended Complaint, of communications with Joshua Christ, as stated in Plaintiffs' Answers to Interrogatory Number 8 of The South Florida Council's Initial Interrogatories.
28. Any and all documents, materials, things, writings, e-mails, notes, photographs and/or video, of any kind or description, received from Douglas Beals.
29. Any and all original documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, pertaining to the incident described in Plaintiffs' Amended Complaint, of communications with Rosemary Novak, as stated in Plaintiffs' Answers to Interrogatory Number 8 of The South Florida Council's Initial Interrogatories.
30. Any and all original documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, pertaining to the incident described in Plaintiffs' Amended Complaint, of communications with Carol Henderson, as stated in Plaintiffs' Answers to Interrogatory Number 8 of The South Florida Council's Initial Interrogatories.
31. Any and all documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, that show that Michael Adelman, Howard Adelman (Michael's father), Judith Sclawy-Adelman (Michael's mother), and Elisabeth Sclawy-Adelman (Michael's sister), accessed, sent and/or received e-mails regarding Troop 111 activities, and/or accessed internet information regarding Troop 111, excluding the subject hike that is described in Plaintiffs' Amended Complaint.
32. Any and all documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, that show that Michael Adelman, Howard Adelman (Michael's father), Judith Sclawy-Adelman (Michael's mother), and Elisabeth Sclawy-Adelman (Michael's sister), accessed, sent, and/or received e-mails regarding Troop 111 activities, and/or accessed

Adelman's care, treatment, counseling, sessions, advice, prescriptions, suggestions and/or interactions with Dr. James Conti, as stated in Plaintiffs' answer to Interrogatory Number 18 of Boy Scouts of America's Initial Interrogatories.

40. Any and all documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, of Howard Adelman's care, treatment, counseling, sessions, advice, prescriptions, suggestions and/or interactions with Dr. James Conti, as stated in Plaintiffs' answer to Interrogatory Number 18 of Boy Scouts of America's Initial Interrogatories.
41. Any and all documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, of Judith Sclawy-Adelman's care, treatment, counseling, sessions, advice, prescriptions, suggestions and/or interactions with Suzanne Leitner, as stated in Plaintiffs' answer to Interrogatory Number 18 of Boy Scouts of America's Initial Interrogatories.
42. Any and all documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, of Howard Adelman's care, treatment, counseling, sessions, advice, prescriptions, suggestions and/or interactions with Suzanne Leitner, as stated in Plaintiffs' answer to Interrogatory Number 18 of Boy Scouts of America's Initial Interrogatories.
43. Any and all documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, of Judith Sclawy-Adelman's care, treatment, counseling, sessions, advice, prescriptions, suggestions and/or interactions with Charlotte Evans, as stated in Plaintiffs' answer to Interrogatory Number 18 of Boy Scouts of America's Initial Interrogatories.
44. Any and all documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, of Howard Adelman's care, treatment, counseling, sessions, advice, prescriptions, suggestions and/or interactions with Charlotte Evans, as stated in Plaintiffs' answer to Interrogatory Number 18 of Boy Scouts of America's Initial Interrogatories.
45. Any and all documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, of Judith Sclawy-Adelman's care, treatment, counseling, sessions, advice, prescriptions, suggestions and/or interactions with Valerie Panciera-Rietch, as stated in

Plaintiffs' answer to Interrogatory Number 18 of Boy Scouts of America's Initial Interrogatories.

46. Any and all documents, materials, things, writings, recordings, transcriptions, notes, photographs and/or video, of any kind or description, of Howard Adelman's care, treatment, counseling, sessions, advice, prescriptions, suggestions and/or interactions with Valerie Panciera-Rietch, as stated in Plaintiffs' answer to Interrogatory Number 18 of Boy Scouts of America's Initial Interrogatories.
47. Any and all documents, e-mails, and/or written communications, sent to and/or received by Judith Sclawy-Adelman and/or Howard Adelman, from any of the Park Rangers from May 9, 2009, until present.
48. Any and all e-mails and/or written communications, sent to any of the Park Rangers by Judith Sclawy-Adelman and/or Howard Adelman from May 9, 2009, until present.
49. Any and all Troop 111 documents, e-mails and/or writings of any kind given to Howard Adelman and/or Judith Sclawy-Adelman or to their attorneys, by Doug Beals since May 9, 2009.
50. Any and all documents that have the registration and/or dates for the Advanced Placement Tests that Michael Sclawy-Adelman was signed up to take in May of 2009.
51. Any and all prescription bottles for any medications prescribed for Michael Sclawy-Adelman in 2006-2009.
52. Any and all invoices submitted to Leesfield & Partners from Carter Conrad, Jr.
53. Any and all invoices to/from Plaintiffs' designated expert witnesses.
54. Any and all statements, both sworn and/or unsworn, taken by counsel for Plaintiffs from any non-retained witnesses.
55. Any and all documents, e-mails, writings of any kind, obtained from Scout members and/or their parents from Troop 111, since January 1, 2009 until present.
56. Any and all documents, communications, e-mails and/or writings of any kind, that shows, mentions, describes and/or otherwise relates to, the temperature in the Big Cypress National Preserve on May 9, 2009.

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WE HEREBY CERTIFY that a true copy of the foregoing was served via *hand delivery* and U.S. Mail, this 1<sup>st</sup> day of August, 2011, 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

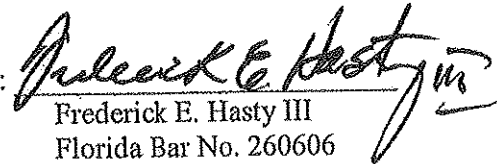
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