

40758

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 10-CV-22236-ASG/GOODMAN

HOWARD ADELMAN AND JUDITH SCLAWY  
as Co-Personal Representatives 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.

**RE-NOTICE OF TAKING DIGITAL VIDEO DEPOSITION DUCES OF  
DEFENDANT SOUTH FLORIDA COUNCIL, INC. BOY SCOUTS OF AMERICA  
UPON ORAL EXAMINATION OF CORPORATION, PARTNERSHIP,  
ASSOCIATION OR GOVERNMENT AGENCY**

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

NAME: Defendant, The South Florida Council's  
Corporate Representative(s) with knowledge of the areas listed below.

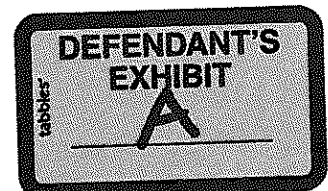
DATE: Monday, August 19, 2011

TIME: 10:00 a.m.

PLACE: Leesfield & Partners, P.A.  
2350 S. Dixie Highway  
Miami, Florida 33133  
(305) 854-4900

**Areas of Inquiry:**

1. The specific courses and/or training programs required for an adult leader to be considered a "trained leader" entitled to the official Boy Scout "Trained" emblem which were in effect on May 9, 2009.



2. The courses and programs which had been completed by Howard Crompton in reference to item number 1 above, as of May 9, 2009.
3. The documentation maintained by the South Florida Council establishing the completion of the courses referred to in item number 1 above by Howard Crompton as of May 9, 2009.
4. Whether or not Howard Crompton was a "trained" leader as that term was defined by the Boy Scouts of America on May 9, 2009, and whether or not he was "eligible" to receive the official "Trained" emblem on said date.


**Duces Tecum:**

1. All documents in the possession of the South Florida Council documenting the courses and/or programs completed by Howard Crompton as of May 9, 2009, which were necessary to become a "trained leader" and entitled to wear the official Boy Scouts of America "Trained" emblem as of May 9, 2009.

Upon oral examination before *Reef, King Welch Legal Services*, 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 *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.

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.

Respectfully submitted,

  
ROBERT D. PELTZ (Fla. Bar No. 220418)  
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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 5<sup>th</sup>, 2011, I served the foregoing by email and First Class U.S. Mail to the persons listed on the attached Service List.



**ROBERT D. PELTZ**

**SERVICE LIST**

<p><b>IRA H. LEESFIELD, ESQ.</b> E-mail: <a href="mailto:leesfield@leesfield.com">leesfield@leesfield.com</a> <b>ROBERT D. PELTZ, ESQ.</b> Email: <a href="mailto:peltz@leesfield.com">peltz@leesfield.com</a> LEESFIELD &amp; PARTNERS, P.A. 2350 S. Dixie Highway Miami, Florida 33133 Telephone: (305) 854-4900 Facsimile: (305) 854-8266 <i>Attorneys for the Plaintiffs</i></p> <p><b>FREDERICK E. HASTY, III, ESQ.</b> Email: <a href="mailto:fhasty@wickersmith.com">fhasty@wickersmith.com</a> WICKER, SMITH, O'HARA, MCCOY, GRAHAM &amp; FORD, P.A. 2800 Ponce de Leon Blvd. Suite 800 Coral Gables, Florida 33134 Telephone: (305) 448-3939 Facsimile: (305) 441-1745 <i>Attorneys for Howard K. Crompton and Andrew L. Schmidt</i></p> <p><b>UBALDO J. PEREZ, ESQ.</b> Email: <a href="mailto:uperez@uperezlaw.com">uperez@uperezlaw.com</a> LAW OFFICE OF UBALDO J. PEREZ, JR., P.A. 8181 NW 154th Street, Suite 210 Miami Lakes, FL 33016 Telephone: (305) 722-8954 Facsimile: (305) 722-8956 <i>Co-Counsel for Howard K. Crompton</i></p>	<p><b>WILLIAM S. REESE, ESQ.</b> Email: <a href="mailto:wreese@lanereese.com">wreese@lanereese.com</a> <b>WILLIAM SUMMERS, ESQ.</b> Email: <a href="mailto:kfranz@lanereese.com">kfranz@lanereese.com</a> <b>KEVIN D. FRANZ, ESQ.</b> Email: <a href="mailto:wsummers@lanereese.com">wsummers@lanereese.com</a> LANE, REESE, SUMMERS, ENNIS &amp; PERDOMO, P.A. 2600 Douglas Road Douglas Centre, Suite 304 Coral Gables, Florida 33134 Telephone: (305) 444-4418 Facsimile: (305) 444-5504 <i>Attorneys for Boys Scouts of America and The South Florida Council, Inc.; Boy Scouts of America</i></p> <p><b>GREG M. GAEBE, ESQ.</b> Email: <a href="mailto:ggaebe@gaebemullen.com">ggaebe@gaebemullen.com</a> GAEBE, MULLEN, ANTONELLI &amp; DIMATTEO 420 South Dixie Highway, 3<sup>rd</sup> Floor Coral Gables, FL 33146 Telephone: (305) 667-0223 Facsimile: (305) 284-9844 – Fax <i>Attorneys for Plantation United Methodist Church</i></p>
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