



December 9, 2010

IRA H. LEESFIELD
Board Certified Civil Trial Lawyer

PATRICIA M. KENNEDY

MARK A. SYLVESTER

THOMAS SCOLARO

ALEXANDER J. PERKINS
Also Admitted in District of Columbia

Via E-Mail

William S. Reese, Esq.
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Via E-Mail

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GAEBE, MULLEN, ANTONELLI & DIMATTEO
420 South Dixie Highway, 3rd Floor
Coral Gables, FL 33146
Ggaebe@GaebeMullen.com

Via E-Mail

Frederick E. Hasty, III, Esq.
WICKER, SMITH, O'HARA et al.,
2800 S.W. 28th Street, 5th Floor
Miami, FL 33133
Fhasty@wickersmith.com

Re: *Estate of Michael Sclawy-Adelman v. Boy Scouts of America, et al.*

Gentlemen:

Reply to Miami Office only:
2350 South Dixie Highway
Miami, Florida 33133
305/854-4900
800/836-6400
Fax: 305/854-8266
E-mail: Info@Leesfield.com
Internet: www.Leesfield.com

Key West:
615 1/2 Whitehead Street
Key West, Florida 33040

South Beach:
1111 Lincoln Road
Miami Beach, Florida 33139

*Winter Park/Orlando:
Of Counsel*
Bounds Gonzalez
222 W. Comstock Avenue
Suite 215
Winter Park, Florida 32789

While I am drafting a proposed stipulation for Magistrate McAliley, please allow this letter to confirm our conversation yesterday that plaintiffs' request the complete preservation of all electronic data within the possession of all defendants including cell phone transmissions and computer transmissions, data and electronic data generated by the Boy Scouts, South Florida Council, and Messrs. Crompton, Schmidt, and Plantation United Methodist Church from a week prior to this incident to date. We also request the names of all cell phone providers for all of the above entities.

I will send to Bill Reese information which will enable him to provide the proper witnesses for our depositions in Irving, Texas; hopefully, during the dates of February 23, 24, and 25.

Bill, since you also represent the South Florida Council, please be advised that we wish to take the depositions of John Anthony, Joshua Crist, and Jeff Hunt.



LEESFIELD
& PARTNERS

December 9, 2010
Page 2

There will be additional depositions of the South Florida Council but since they are local, we can conduct them in early March, after you clear dates with these witnesses.

I will be back to all of you in the next day or so with the draft order reflecting our progress. With this letter I trust you will inform all of your clients of necessity to preserve their computer and cell phone information related to the events leading up to, during, and after this tragic death.

Very truly yours,



Ira H. Leesfield

IHL/lag

MEMORY TRANSMISSION REPORT

TIME : 12-09-'10 16:39
FAX NO.1 : 3058548266
NAME : Leesfield & Partners

FILE NO. : 362
DATE : 12.09 16:34
TO : 8 3054411745
DOCUMENT PAGES : 3
START TIME : 12.09 16:37
END TIME : 12.09 16:38
PAGES SENT : 3
STATUS : OK

*** SUCCESSFUL TX NOTICE ***



Facsimile Cover Sheet

Date: December 9, 2010
To: William S. Reese, Esq.
William L. Summers, Esq.
Greg M. Goebe, Esq.
Frederick E. Hasty, III, Esq.
Fax No.: 305-444-5504
305-284-9844
305-441-1745
From: Mark A. Sylvester
LEESFIELD & PARTNERS, P.A.
2350 South Dixie Highway
Miami, FL 33133
Ph: (305) 854-4900
Fax: (305) 854-8266

Number of pages (including cover sheet): X 3

Original document: _____ will be sent _____ X will not be sent

CONFIDENTIALITY NOTICE

The information contained in this facsimile is legally privileged and confidential, intended only for the use of the named individual recipient. If this facsimile has been transmitted or delivered in error, you are advised that dissemination, copying or use is strictly prohibited. If this has been received in error, please contact the sender collect at (305) 854-4900. You will be reimbursed for any charges incurred in returning this document.

MEMORY TRANSMISSION REPORT

TIME : 12-09-'10 16:36
FAX NO.1 : 3058548266
NAME : Leesfield & Partners

FILE NO. : 361
DATE : 12.09 16:34
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DOCUMENT PAGES : 3
START TIME : 12.09 16:35
END TIME : 12.09 16:36
PAGES SENT : 3
STATUS : OK

*** SUCCESSFUL TX NOTICE ***



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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:

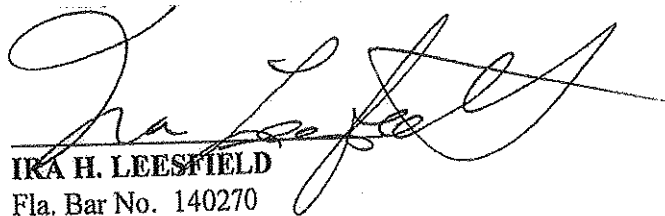
<u>DEPONENT/NAME</u>	<u>DATE AND TIME</u>	<u>PLACE</u>
John Anthony	February 18, 2011 1:00 p.m.	Corporate Headquarters of South Florida Council, Inc., Boy Scouts of America 15255 NW 82 Street Miami Lakes, Florida

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
LEESFIELD & PARTNERS, P.A.
2350 S. Dixie Highway
Miami, Florida 33133
Telephone: (305) 854-4900
Facsimile: (305) 854-8266
E-mail: leesfield@leesfield.com
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 10, 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

<p>IRA H. LEESFIELD LEESFIELD & PARTNERS, P.A. 2350 S. Dixie Highway Miami, Florida 33133 Telephone: 305-854-4900 Facsimile: 305-854-8266 E-mail: leesfield@leesfield.com <i>Attorneys for the Plaintiffs</i></p> <p>FREDERICK E. HASTY, III WICKER, SMITH, O'HARA, MCCOY, GRAHAM & FORD, P.A. Grove Plaza Building, 5th Floor 2900 Middle Street Miami, Florida 33133 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>WILLIAM S. REESE WILLIAM SUMMERS KEVIN D. FRANZ LANE, REESE, SUMMERS, ENNIS & PERDOMO, P.A. 2600 Douglas Road Douglas Centre, Suite 304 Coral Gables, Florida 33134 Telephone: 305-444-4418 Facsimile: 305-444-5504 Email: wreese@lanereese.com kfranz@lanereese.com wsummers@lanereese.com <i>Attorneys for Boys Scouts of America and The Defendant South Florida Council, Inc.; Boy Scouts of America</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>
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SCHEDULE A

1. All non-privileged correspondence, emails or other types of communication between the South Florida Council and/or this deponent and Troop 111.
2. All correspondence, emails or other types of communications between South Florida Council and/or this deponent Michael Sclawy-Adelman or the Plaintiffs in this case.
3. All non-privileged correspondence, emails or other types of communications between the South Florida Council and/or this deponent, and defendants Crompton or Schmidt.
4. All documents, materials or tangible things which relate to the responsibilities of this deponent with respect to Crompton and Schmidt and/or Plantation United Methodist Church and/or Troop 111.
5. 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.
6. All documents, materials or tangible things which the South Florida Council and/or this deponent sent or caused to be sent to Crompton and Schmidt and/or Troop 111.
7. All documents, materials or tangible things which the South Florida Council and/or this deponent sent or caused to be sent to Michael Sclawy-Adelman or the Plaintiffs in this case.
8. All documents, materials or tangible things which are related to the hike of May 9, 2009.
9. All documents, materials or tangible things related to Michael Sclawy-Adelman and/or his death.
10. Any and all photographs, videotapes, charts, maps, and other documentary evidence relative to the subject hike.
11. Any and 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.

12. Any and all statements of plaintiff(s), plaintiffs' agents and employees, or plaintiff's witnesses; and defendant(s), defendants' agents and employees; bearing on knowledge of facts relevant and material to the claims and defenses in the instant litigation.
13. The South Florida Council's investigative file pertaining to the May 9, 2009, hike and/or the death of Michael Sclawy-Adelman, including, but not limited to any and all notes, correspondence, statements, interviews, audio recordings, video recordings, photographs, charts, maps and reports.
14. The South Florida Council's complete file on Howard K. Crompton, including but not limited to scouting records, Scoutmaster records, all training records, certifications, licenses, merits, de-merits, disciplinary actions and warnings.
15. The South Florida Council's complete file on Andrew L. Schmidt, including but not limited to scouting records, Scoutmaster records, all training records, certifications, licenses, merits, de-merits, disciplinary actions and warnings.
16. Entire scouting and Scoutmaster file for Howard K. Crompton.
17. Entire scouting and Scoutmaster file for Andrew L. Schmidt.
18. Any and all written guidelines, training manuals, checklists, policies, procedures, first aid training handbooks, manuals, or other written document, as well as videotape and computerized materials that provide instruction, guidance and training to Scoutmasters.
19. Any and all documentation, correspondence, memoranda, records or notes regarding complaints made by any individual, entity or agency (whether public or private) relative to boy scout hikes for the past 10 years.
20. Any notices, warnings, orders or directives from any governmental agency indicating the presence of any violation on the part of the Defendant The South Florida Council relative to the subject incident.
21. Any and all documents in the possession of South Florida Council and/or this deponent relative to the application, selection, retention, review or the like of Scoutmaster Howard K. Crompton.
22. Any and all documents in the possession of South Florida Council and/or this

deponent relative to the application, selection, retention, review or the like of Scoutmaster Andrew L. Schmidt.

23. Any and all documents in the possession of South Florida Council and/or this deponent relative to any scouting activities of Defendant Howard K. Crompton at any time.
24. Any and all documents in the possession of South Florida Council and/or this deponent relative to any scouting activities of Defendant Andrew L. Schmidt at any time.
25. A copy of any and all complaints filed in any court of law against South Florida Council relative to scouts injured or killed on boy scout related hikes over the past 10 years.
26. Any permits received or provided by South Florida Council and/or this deponent relative to the May 9, 2009 from any source whatsoever.
27. Any applications received by or provided for permits relative to the May 9, 2009, hike.
28. Any notification or any other documents, materials or tangible things the South Florida Council and/or this deponent provided to the National Park Service personnel or officials relative to the May 9, 2009 hike.

FILE NO. : 894

*** SUCCESSFUL TX NOTICE ***

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>
John Anthony	February 18, 2011 1:00 p.m.	Corporate Headquarters of South Florida Council, Inc., Boy Scouts of America 15255 NW 82 Street Miami Lakes, 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

MULTI TRANSMISSION REPORT

TIME : 01-10-'11 15:27
FAX NO.1 : 3058548266
NAME : Leesfield & Partners

FILE NO. : 895
DATE : 01.10 15:09
DOCUMENT PAGES : 6
START TIME : 01.10 15:22
END TIME : 01.10 15:27

SUCCESSFUL

FAX NUMBER

☎ 3052849844

☎ 3054445504

☎ 3054411745

UNSUCCESSFUL

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
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Plaintiffs,

vs.

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PLANTATION UNITED METHODIST CHURCH;
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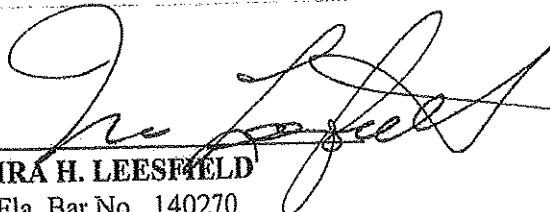
<u>DEPONENT/NAME</u>	<u>DATE AND TIME</u>	<u>PLACE</u>
Jeff Hunt	February 14, 2011 2:00 p.m.	Corporate Headquarters of South Florida Council, Inc., Boy Scouts of America 15255 NW 82 Street Miami Lakes, Florida

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IRA H. LEESFIELD

Fla. Bar No. 140270

LEESFIELD & PARTNERS, P.A.

2350 S. Dixie Highway

Miami, Florida 33133

Telephone: (305) 854-4900

Facsimile: (305) 854-8266

E-mail: leesfield@leesfield.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 10, 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

<p>IRA H. LEESFIELD ROBERT PELTZ LEESFIELD & PARTNERS, P.A. 2350 S. Dixie Highway Miami, Florida 33133 Telephone: 305-854-4900 Facsimile: 305-854-8266 E-mail: leesfield@leesfield.com peltz@leesfield.com <i>Attorneys for the Plaintiffs</i></p> <p>FREDERICK E. HASTY, III WICKER, SMITH, O'HARA, MCCOY, GRAHAM & FORD, P.A. Grove Plaza Building, 5th Floor 2900 Middle Street Miami, Florida 33133 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>WILLIAM S. REESE WILLIAM SUMMERS KEVIN D. FRANZ LANE, REESE, SUMMERS, ENNIS & PERDOMO, P.A. 2600 Douglas Road Douglas Centre, Suite 304 Coral Gables, Florida 33134 Telephone: 305-444-4418 Facsimile: 305-444-5504 Email: wreese@lanereese.com kfranz@lanereese.com wsummers@lanereese.com <i>Attorneys for Boys Scouts of America and The Defendant South Florida Council, Inc.; Boy Scouts of America</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@gacbemullen.com <i>Attorneys for Plantation United Methodist Church</i></p>
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11. Any and 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.

12. Any and all statements of plaintiff(s), plaintiffs' agents and employees, or plaintiff's witnesses; and defendant(s), defendants' agents and employees; bearing on knowledge of facts relevant and material to the claims and defenses in the instant litigation.
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20. Any notices, warnings, orders or directives from any governmental agency indicating the presence of any violation on the part of the Defendant The South Florida Council relative to the subject incident.
21. Any and all documents in the possession of South Florida Council and/or this deponent relative to the application, selection, retention, review or the like of Scoutmaster Howard K. Crompton.
22. Any and all documents in the possession of South Florida Council and/or this deponent relative to the application, selection, retention, review or the like of

Scoutmaster Andrew L. Schmidt.

23. Any and all documents in the possession of South Florida Council and/or this deponent relative to any scouting activities of Defendant Howard K. Crompton at any time.
24. Any and all documents in the possession of South Florida Council and/or this deponent relative to any scouting activities of Defendant Andrew L. Schmidt at any time.
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FILE NO. : 892

*** SUCCESSFUL TX NOTICE ***

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.

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<u>DEPONENT/NAME</u>	<u>DATE AND TIME</u>	<u>PLACE</u>
Jeff Hunt	February 14, 2011 2:00 p.m.	Corporate Headquarters of South Florida Council, Inc., Boy Scouts of America 15255 NW 82 Street Miami Lakes, Florida

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NAME : Leesfield & Partners

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DATE : 01.10 15:06
DOCUMENT PAGES : 6
START TIME : 01.10 15:12
END TIME : 01.10 15:19

SUCCESSFUL

FAX NUMBER

☎ 3052849844

☎ 3054445504

☎ 3054411745

UNSUCCESSFUL