

EXHIBIT A



December 9, 2010

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

Dear Counsel:

I thought yesterday's telephone conference was very productive. I appreciate your cooperation in moving the discovery process along and in resolving, to the extent we can, the issues related to document discovery. As we discussed, here is the information regarding the depositions the Plaintiffs wish to take.

With respect to Boys Scouts of America in February 2011:

- The corporate representative with the most knowledge of every procedure related to outdoor scouting activities, in particular, hiking, trekking, any other physical scouting activities, first aid, medical assistance, emergency preparedness, and communication procedures in case of emergency. We also wish to depose the person or persons who formulate and enforce the organization's policies related to each of the areas mentioned herein. If one person does not satisfy all of the categories, please let us know in advance so we can set aside ample time.

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In addition, we wish to depose:

- The Chief Scout Executive of Boy Scouts of America (Robert Mazzuca)
- The organization's health safety administrator/officer by whatever title known;
- The authors and/or custodians of all health, safety, and emergency procedures;
- The person who formulates all information and communicates policies related to the investigations of injuries and deaths arising from, occurring in the course of, and/or related to scouting activities;
- The Records custodian of Adelman case within the organization;
- The Records custodian with the most knowledge and information on the communications of rules, regulations and procedures related to (1) hiking activities and (2) rescue, safety, and emergency procedures
- The person responsible for all scouting policies/procedures/guidelines on hiking safety;
- The person within the organization who Crompton and Schmidt report to in their capacities as scoutmasters and/or who Troop 111 reports to,
- The person within the organization who the South Florida Council, Boy Scouts of America reports to or communicates with;
- The person who formulates and/or is responsible for guidelines and policies for selection of scout masters;
- The person who formulates and/or is responsible for guidelines and policies for scoutmaster training ;

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- The person who formulates and/or is responsible for guidelines and policies for first aid and emergency situations;
- The person who receives information and/or corresponds with any representative of any of the co-defendants in this case including Messrs. Schmidt, Crompton, Scout Troop 111, the South Florida Council, Messrs. John Anthony, Joshua Crist, and Jeff Hunt;
- The person with the most knowledge of the facts and circumstances surrounding and related to the death of Michael Sclawy-Adelman.

Once Bill confirms the dates for these witnesses, we will notice the depositions, duces tecum. We will ask that the witnesses have with them at their depositions any and all correspondence between Boy Scouts of America, Troop 111, and all other defendants that is not privileged and work product; any materials provided by Boy Scouts of America to Troop 111, South Florida Council, and all other defendants dealing with the issue of hiking safety, first aid, administration of first aid; and all documents related to the subject matter of their designated knowledge as set forth above.

I may need to revise this list as we move forward, but this should provide the essence of both the people we wish to depose and the documentation we wish them to produce.

With respect to South Florida Council, Boy Scouts of America:

We wish to depose the same categories of persons from the South Florida Council as set forth above for Boy Scouts of America. We would like to depose the Executive Director, Jeff Hunt, and Chief Operating Officer, Joshua Crist and John Anthony. This may lead to additional witnesses.

Inasmuch as the depositions of the witnesses for the South Florida Council are local, we are requesting 2 ½ days of depositions. If everyone would please check your calendars for possible dates when you are available in late January 2011, we can go ahead and set these depositions.

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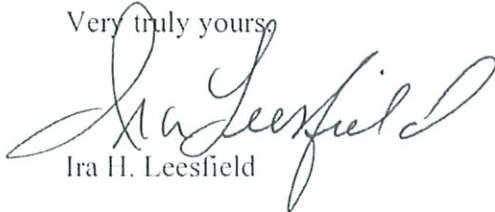
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With respect to Andrew Schmidt and Howard Crompton:

I anticipate that we will need one day for each of these defendants. If possible, we would like to depose them in January 2011, so please let me know what dates they, and you, are available.

Finally, please check your availability for depositions of the Plaintiffs, commencing January 27, 2011, at 10:30 a.m. and January 28, 2011, at 10:00 a.m.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Ira H. Leesfield". The signature is written in dark ink and is positioned above the printed name.

Ira H. Leesfield

IHL/lag