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LAW OFFICES  
**WICKER, SMITH, O'HARA  
McCoy & Ford, P.A.**

2900 S.W. 28TH TERRACE, 5TH FLOOR

MIAMI, FLORIDA 33133

(305) 441-3939

FAX (305) 441-1745

WWW.WICKERSMITH.COM

FORT LAUDERDALE  
(954) 847-4800

WEST PALM BEACH  
(561) 689-3800

ORLANDO  
(407) 843-3939

TAMPA  
(813) 222-3939

NAPLES  
(239) 552-5300

JACKSONVILLE  
(904) 355-0225

January 4, 2011

**VIA FACSIMILE**

Ira H. Leesfield, Esquire  
Leesfield & Partners, P.A.  
2350 South Dixie Highway  
Miami, FL 33133

RE: Adelman v. Howard K. Crompton and Andrew L. Schmidt  
Our File No.: 66450-3

Dear Mr. Leesfield:

When we did the inspection in compliance with Rule 26, we requested copies of documents and things which were identified with your paralegal in your office on November 24<sup>th</sup>, 2010. When we did our telephone conference on December 8<sup>th</sup>, 2010, we reminded you that we had not received the documents and we were told that your law clerks were in final exams. We still have not received the documents and things that we requested. We need these documents and things in order to properly prepare to depose the parents. Please have the documents and things delivered to us forthwith.

On December 8<sup>th</sup>, 2010, we brought to your attention the fact that the cellphone had never been disclosed to us. We understand your contention that the cellphone is not relevant but we disagree with that assertion completely. We think that Michael Adelman's cellphone is relevant and we agreed on December 8<sup>th</sup>, 2010, you would provide us with his cellphone number and the name of his provider. We also asked for the names of the providers of his parents' cellphone. You told us that was "not going to be a problem." However, since December 8<sup>th</sup>, 2010, we have not been provided that information nor do we know who to subpoena. We just completed a

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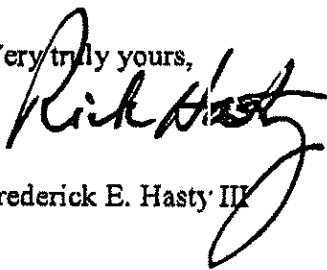
lengthy Hearing with the Magistrate on December 29<sup>th</sup>, 2010, and we have no compliance with your promise to provide the information pertaining to the cellphones.

In the same conference on December 8<sup>th</sup>, 2010, we requested the information about computers in the household where Michael lived and which were used to effectuate communications with Troop 111 and the Scout Masters. Both parents were involved in the Scout activities including the spaghetti dinner, which is a fundraiser, done annually for Troop 111. Communications about Troop 111 and activities were sent via e-mail and we have requested that we be advised which computers were utilized so that we can get that information prior to the deposition of the parents. Again, there has been no compliance with that request.

We agreed to try to handle things by letter agreement, oral agreement, or informal means, as opposed to filing formal discovery with the court and going to the Magistrate. I have kept my word and told you that we would produce our clients in March which was what you requested. We will file formal written discovery requests and a motion to shorten time which was recommended by the Magistrate. I will tell you that I am not going to notice the parents for deposition on January 28<sup>th</sup> and 29<sup>th</sup>, 2011, and be compromised because we do not have the documents, we do not have the cellphone information, we do not have the computer information, and we do not have adequate time to prepare what we think is appropriate examination for the deposition of the parents. We do not want to waste their time or your time in which to conduct meaningful cross examination. While we may not agree on relevancy or scope, we are endeavoring to discover what evidence was contained in the Rule 26 disclosure and in your Interrogatory answers to the Boy Scouts of America previously filed in this case. All of the information that was requested in a subpoena duces tecum came directly out of your Complaint, your Rule 26 disclosure, and your discovery responses provided in this case.

I look forward to receiving the cellphone information, the computer information, the documents we requested on November 24<sup>th</sup>, 2010, and I will provide you with information about the forensic independent laboratories. I am available to discuss this and all other matters with you and other counsel at a mutually convenient time.

Very truly yours,



Frederick E. Hasty III

FEH/ts

cc: Greg M. Gaebe, Esquire  
William L. Summers, Esquire