

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC, ¹ Debtors.	Chapter 11 Case No. 20-10343 (LSS) (Jointly Administered)
CENTURY INDEMNITY COMPANY and CHUBB GROUP HOLDINGS, INC., Plaintiffs v. TIMOTHY KOSNOFF Defendant.	Adv. Proc. No. _____

COMPLAINT FOR INJUNCTIVE RELIEF

Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America (“Century”), and Chubb Group Holdings, Inc. (“Chubb,” together with Century, the “Plaintiffs”) allege for their Complaint (the “Complaint”), upon knowledge of their own acts and upon information and belief as to other matters, as follows:

NATURE OF THE ACTION AND THE NEED FOR RELIEF

1. This is an adversary proceeding brought pursuant to Rules 7001(7) and 7065 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 105(a) of title 11 of the United States Code (the “Bankruptcy Code”). This adversary proceeding seeks to enjoin

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are as follows: Boy Scouts of America (6300) and Delaware BSA, LLC (4311). The Debtors’ mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

Dated: January 21, 2022

Respectfully Submitted,

By: Stamatios Stamoulis
Stamatios Stamoulis (#4606)

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successor to Insurance Company of North
America*

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BOY SCOUTS OF AMERICA AND
DELAWARE BSA, LLC,¹
Debtors.

CENTURY INDEMNITY COMPANY and
CHUBB GROUP HOLDINGS, INC.,
Plaintiffs,

v.

TIMOTHY KOSNOFF,
Defendant.

Chapter 11

Case No. 20-10343 (LSS)
(Jointly Administered)

Adv. Proc. No. _____

NOTICE OF DISPUTE RESOLUTION ALTERNATIVES

As party to litigation you have a right to adjudication of your matter by a judge of this Court. Settlement of your case, however, can often produce a resolution more quickly than appearing before a judge. Additionally, settlement can also reduce the expense, inconvenience, and uncertainty of litigation.

There are dispute resolution structures, other than litigation, that can lead to resolving your case. Alternative Dispute Resolution (ADR) is offered through a program established by this Court. The use of these services are often productive and effective in settling disputes. **The purpose of this Notice is to furnish general information about ADR.**

The ADR structures used most often are mediation, early-neutral evaluation, mediation/arbitration and arbitration. In each, the process is presided over by an impartial third party, called the "neutral".

In mediation and early neutral evaluation, an experienced neutral has no power to impose a settlement on you. It fosters an environment where offers can be discussed and exchanged. In the process, together, you and your attorney will be involved in weighing settlement proposals and crafting a settlement. The Court in its Local Rules requires all ADR processes, except threat of a potential criminal action, to be confidential. You will not be prejudiced in the event a settlement is not achieved because the presiding judge will not be advised of the content of any of your settlement discussions.

Mediation/arbitration is a process where you submit to mediation and, if it is unsuccessful, agree that the mediator will act as an arbitrator. At that point, the process is the same as arbitration. You, through your counsel, will present evidence to a neutral, who issues a decision. If the matter in controversy arises in the main bankruptcy case or arises from a subsidiary issue in an adversary proceeding, the arbitration, though voluntary, may be binding. If a party requests *de novo* review of an arbitration award, the judge will rehear the case.

Your attorney can provide you with additional information about ADR and advise you as to whether and when ADR might be helpful in your case.

Dated January 21, 2022

/s/ Una O'Boyle
Clerk of Court

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**SUMMONS AND NOTICE OF PRETRIAL CONFERENCE
IN AN ADVERSARY PROCEEDING**

YOU ARE SUMMONED and required to file a motion or answer to the complaint which is attached to this summons with the clerk of the bankruptcy court within 30 days after the date of issuance of this summons, except that the United States and its offices and agencies shall file a motion or answer to the complaint within 35 days.

Address of Clerk: 824 Market Street, 3 rd Floor Wilmington, DE 19801

At the same time, you must also serve a copy of the motion or answer upon the plaintiff's attorney.

Name and Address of Plaintiff's Attorney:

STAMOULIS & WEINBLATT LLC Stamatios Stamoulis 800 N. West Street Third Floor Wilmington, Delaware 19801 Telephone: (302) 999-1540 Facsimile: (302) 762-1688	O'MELVENY & MYERS LLP Tancred Schiavoni Times Square Tower 7 Times Square New York, New York 10036-6537 Telephone: (212) 326-2000 Facsimile: (212) 326-2061	SIMPSON THACHER & BARTLETT LLP Mary Beth Forshaw 425 Lexington Avenue New York, New York 10017 Telephone: (212) 455-2000 Facsimile: (212) 455-2502
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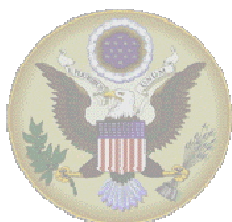
If you make a motion, your time to answer is governed by Fed. R. Bankr. P. 7012.

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YOU ARE NOTIFIED that a pretrial conference of the proceeding commenced by the filing of the complaint will be held at the following time and place.

Address	Room
United States Bankruptcy Court	Courtroom No. 2
824 Market Street, 6 th Floor	Date and Time
Wilmington, Delaware 19801	March 16, 2022 at 10:00 a.m. (ET)

IF YOU FAIL TO RESPOND TO THIS SUMMONS, YOUR FAILURE WILL BE DEEMED TO BE YOUR CONSENT TO ENTRY OF A JUDGMENT BY THE BANKRUPTCY COURT AND JUDGMENT BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.



United States Bankruptcy
Court for the District
of Delaware

/s/ Una O'Boyle
Clerk of the Bankruptcy Court

Date: January 21, 2022