

**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)

**FIFTH SUPPLEMENTAL DECLARATION OF JESSICA C. LAURIA
IN SUPPORT OF DEBTORS' APPLICATION FOR ENTRY OF
AN ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF
WHITE & CASE LLP AS ATTORNEYS TO THE DEBTORS AND
DEBTORS IN POSSESSION EFFECTIVE AS OF SEPTEMBER 23, 2020**

I, Jessica C. Lauria, pursuant to 28 U.S.C. § 1746, declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a partner of the firm of White & Case LLP ("White & Case" or the "Firm") and am duly authorized to make this fourth supplemental declaration (the "Fourth Supplemental Declaration") on behalf of White & Case in support of the *Debtors' Application for Entry of an Order Authorizing the Retention and Employment of White & Case LLP as Attorneys to the Debtors and Debtors in Possession Effective as of September 23, 2020* [D.I. 1571] (the "Application") and pursuant to Bankruptcy Rule 2014 and Local Rule 2014-1.² My initial declaration was submitted as Exhibit B to the Application (the "Initial Declaration"), and I later provided a supplemental declaration [D.I. 1657] (the "First Supplemental Declaration"), a second supplemental declaration [D.I. 1886] (the "Second Supplemental Declaration"), a third

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.

² Capitalized terms used but not otherwise defined here have the meanings ascribed to such terms in the Application.

supplemental declaration [D.I. 7148] (the “Third Supplemental Declaration”), and a fourth supplemental declaration [D.I. 7582] (the “Fourth Supplemental Declaration”) in support of the Application. The Court approved the Firm’s retention on November 18, 2020 [D.I. 1698].

2. Except as otherwise noted, I have personal knowledge of the matters set forth herein.³

3. As noted in my previous declarations submitted in support of the Application, White & Case has reviewed and will continue to review its files periodically during these chapter 11 cases with respect to known and newly identified parties in interest. If any new relevant facts or relationships are discovered or arise, White & Case will use reasonable efforts to identify such developments and will promptly file a supplemental declaration, as required by Bankruptcy Rule 2014(a) and Local Rule 2014-1(a).

4. In connection with the Initial Declaration, White & Case obtained from the Debtors and their agents the names of individuals and entities that may be parties in interest in these chapter 11 cases (the “Potential Parties in Interest”), which were first listed on Schedule 1 attached to the Initial Declaration. Later, White & Case received or otherwise identified the names of additional Potential Parties in Interest in these chapter 11 cases (the “First Supplemental Potential Parties in Interest List”), which list was attached as Schedule 1 to the Second Supplemental Declaration. Later still, White & Case received or otherwise identified the names of additional Potential Parties in Interest (the “Second Supplemental Potential Parties in Interest List”), which list was attached as Schedule 1 to the Third Supplemental Declaration. Thereafter, White & Case received or otherwise identified the names of additional Potential Parties in Interest (the “Third Supplemental

³ Certain of the disclosures herein relate to matters within the knowledge of attorneys or employees of White & Case and are based on information provided by them.

Potential Parties in Interest List”), which list was attached as Schedule 1 to the Fourth Supplemental Declaration. Most recently, White & Case received or otherwise identified the names of additional Potential Parties in Interest (the “Fourth Supplemental Potential Parties in Interest List”), which list is attached hereto as **Schedule 1**.

5. White & Case conducted searches of its electronic client database for connections with the Potential Parties in Interest listed on the Fourth Supplemental Potential Parties in Interest List. Based on these searches, White & Case has identified certain Potential Parties in Interest or their apparent affiliates that White & Case represents, or has represented within the last five (5) years, as a client in matters unrelated to the Debtors, the chapter 11 cases, or such entities’ claims against or interests in the Debtors.⁴ The table attached hereto as **Schedule 2** lists the Potential Parties in Interest identified through these searches as current or former clients of White & Case and the status of the matters in which White & Case represents or represented such Potential Parties in Interest or their apparent affiliates, as applicable.

6. Furthermore, after the prior connections searches undertaken by White & Case in relation to the Potential Parties in Interest disclosed in the Initial Declaration, the First Supplemental Declaration, the Second Supplemental Declaration, the Third Supplemental Declaration or the Fourth Supplemental Declaration (as applicable), White & Case may have opened new matters representing existing Potential Parties in Interest or their apparent affiliates on matters unrelated to the Debtors, the chapter 11 cases, or such entities’ claims against or

⁴ The term “client” means an entity listed as a client or affiliate of a client in an active or closed matter in White & Case’s conflicts search system. To the extent that a Potential Party in Interest falls under more than one category, such Potential Party in Interest is disclosed below in only one category. Furthermore, the inclusion of a Potential Party in Interest within one or more categories in the Application or this Declaration is for convenience only and is not, and shall not be construed as, an acknowledgment or admission regarding any Potential Party in Interest, including with respect to any claims or relationships that such Potential Party in Interest may have with the Debtors.

interests in the Debtors. Specifically, based on its periodic review of its files, the table attached hereto as **Schedule 3** identifies certain Potential Parties in Interest or their apparent affiliates that White & Case currently represents, or has represented since the filing of my prior declarations, in matters unrelated to the Debtors, the chapter 11 cases, or such entities' claims against or interests in the Debtors. In each instance, White & Case's representation related to matters unrelated to the Debtors, the chapter 11 cases, or such entities' claims against or interests in the Debtors.

7. None of the current or former clients listed on Schedules 2 and 3 represents more than 1% of White & Case's revenue for the twelve-month period from January 2021 through December 2021.

8. Thus, to the best of my knowledge, (i) White & Case is a "disinterested person" under section 101(14) of the Bankruptcy Code, as required by section 327(a) of the Bankruptcy Code, and does not hold or represent an interest adverse to the Debtors' estates, and (ii) White & Case has no connection with any of the Debtors, their affiliates, their creditors, or any other party in interest, or their respective attorneys and accountants, the United States Trustee for the District of Delaware or any person employed in the office of the same, or any judge of the United States Bankruptcy Court or District Court for the District of Delaware or any person in the offices of the same, except as may be disclosed in the Initial Declaration, the First Supplemental Declaration, the Second Supplemental Declaration, the Third Supplemental Declaration, the Fourth Supplemental Declaration, and this Declaration.

[Remainder of Page Intentionally Left Blank]

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: January 14, 2022
New York, New York

Respectfully submitted,

/s/ Jessica C. Lauria

Jessica C. Lauria

Partner

WHITE & CASE LLP

Schedule 1

Fourth Supplemental Potential Parties in Interest List

Third-Party Discovery Parties

Archer Systems, LLC
Case Works, LLC
Catalur Special Opportunities Fund I, LP
Consumer Attorney Marketing Group, LLC
 c/o Michael Vizvary
Corbin ERISA Opportunity Fund, Ltd
Corbin Opportunity Fund, L.P.
EPIQ Systems, Inc.
Ferncroft Capital LLC
Fortress Credit Corp
KLS Legal Solutions, LLC
Law Ruler
Legal Conversion Center c/o Monica Ingram
Legal Help Center c/o Michele F. Cohen
Legal-Bay Lawsuit Funding
Marc J. Bern & Partners LLC
Reciprocity Industries, LLC
Rocan Capital LLC
Stratos Legal
Verus, LLC

Ordinary Course Professionals

535 Group LLC
Barnes Lipscomb Stewart & Ott
The BVA Group

**Professionals Representing Certain
Parties in Interest**

Barnes & Thornburg LLP
Gellert Scali Busenkell & Brown, LLC
Gray Reed
Hodgson Russ LLP
Kiernan Trebach LLP
Klehr Harrison Harvey Branzburg LLP
Lowenstein Sandler LLP
Sullivan Hazetina Allinson LLC
The Rosner Law Group LLC
Werb & Sullivan

Miscellaneous

Cattaraugus-Little Valley School District
Ponil Ranch L.P.
Presbyterian Church at Woodbury
West Valley Central School District

Schedule 2

Results of the Connections Search on Supplemental Parties in Interest Listed on Schedule 1

Category	Open Unrelated Client Matter(s)	Closed Unrelated Client Matter(s)
Third-Party Discovery Parties	Fortress Credit Corp	

Schedule 3

Results of the Updated Connections Search for Existing Potential Parties in Interest

Category	Open Unrelated Client Matter(s)	Closed Unrelated Client Matter(s)
Secured Parties	TIAA Commercial Finance, Inc.	
Banks	State Street Bank	