

**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)

Ref. D.I. 7118, 7119, 7122

**STATUS REPORT REGARDING DEBTORS' EMERGENCY MOTION
(I) ENFORCING THE SOLICITATION PROCEDURES ORDER,
(II) ENFORCING SECTION 1103 OF THE BANKRUPTCY CODE AGAINST THE
TORT CLAIMANTS' COMMITTEE, AND (III) GRANTING RELATED RELIEF**

1. The Debtors file this status report (this "Report") to apprise the Court of developments since the hearing on Friday, November 12 in connection with the *Debtors' Emergency Motion (I) Enforcing the Solicitation Procedures Order, (II) Enforcing Section 1103 of the Bankruptcy Code Against the Tort Claimants' Committee, and (III) Granting Related Relief* [D.I. 7118] (the "Motion").²

2. As instructed by the Court, the parties continued to discuss the form of order granting the Motion following the conclusion of the November 12 hearing. The Debtors, the TCC, the Coalition, and certain other parties have agreed on the terms of an interim order providing certain specified relief in accordance with the Motion (the "Proposed Interim Order"). Because the investigation of this matter is ongoing, entry of the Proposed Interim Order is without prejudice to requests for further and other applicable legal or equitable remedies for, or other relief in connection with, the TCC's actions. The parties intend to present the Proposed Interim Order at

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 defined herein shall have the meanings ascribed to them in the Motion.

the November 17 hearing. A copy of the Proposed Interim Order, which was previously provided to the Court, is attached hereto as **Exhibit 1**, and a redline comparison of the Proposed Interim Order against the original form of order appended to the Motion is attached hereto as **Exhibit 2**.

3. As the Court is aware, the Debtors issued written discovery requests to the TCC on Monday, November 8, and the TCC provided written responses and produced certain documents in the evening on Thursday, November 11. These responses and documents raise significant concerns with respect to the events surrounding the TCC/Kosnoff Communications, including certain inconsistencies between the TCC's representations at the November 10 hearing and the November 12 hearing:

- **TCC Initiated Sending Email Without Explanation.** It is evident that the idea of transmitting the TCC/Kosnoff Communications originated with Mr. John Lucas—a copy of the communication from Mr. Lucas is attached hereto as **Exhibit 3**.³ See Email from Mr. Lucas to Mr. Kosnoff (Nov. 5, 2021) (“Want us to help you resend your letter?”; “Send me your letter. Also, send me what you want stated in the email.”). There is still no explanation for why the TCC would offer to send the communications of an individual attorney to his purported clients when he was perfectly capable of making the same distribution from his own email account—and apparently did, considering the references by Mr. Lucas to “resending” the letter.
- **TCC Counsel Reviewed and Edited TCC/Kosnoff Email.** During the November 12 hearing, in response to the Court's question about what Debra Grassgreen meant by her assertion that the TCC/Kosnoff Communications were “forwarded from [the TCC] email” but were not “signed by” the TCC, Ms. Grassgreen stated that the TCC/Kosnoff Communications were “a transmission and I think there's a difference between us transmitting someone else's statement. If one says to me, would you forward the email that so and so sent you, doesn't mean that I've adopted or endorsed what's in the email; it means that I've forwarded it.”⁴ See Ex. 4, Nov. 12, 2021 Hr'g Tr. at 31:5-8. Mr. James

³ The TCC has agreed that the exhibits attached to this Report may be de-designated as highly confidential materials under the *Confidentiality and Protective Order* [D.I. 799] such that the Debtors are not required to file these documents under seal.

⁴ Contrary to the TCC's statements that it did not endorse Mr. Kosnoff's Twitter feed, the Kosnoff Email, which the TCC sent from its official email address after review and comment by Mr. Lucas, invited recipients of the TCC/Kosnoff Email to review Mr. Kosnoff's Twitter feed. See TCC/Kosnoff Email from BSASurvivors@pszjlaw.com, Warner Decl. [D.I. 7119], Ex. 3 (“Please stay current on what is happening by following me on Twitter @sexabuseattys.”). Clearly, this was an endorsement of the Kosnoff Email and its contents.

Stang made a similar assertion at the November 10 hearing: “MR. STANG: This motion concerns one email that was written by Mr. Kosnoff. **We had no participation in the writing of it.**” *See* Ex. 5, Nov. 10, 2021 Hr’g Tr. at 17:25-18:1 (emphasis added).

The TCC continues to characterize the distribution of the TCC/Kosnoff Communications as a “mistake,” including in its most recent status report filed on November 15. These statements are inconsistent with the communications that the TCC produced to the Debtors, which clearly show that Mr. Kosnoff sought input from the TCC and Mr. Lucas reviewed and revised the TCC/Kosnoff Communications prior to distribution. *See* Ex. 6, Email from Mr. Lucas to Mr. Timothy Kosnoff (Nov. 5, 2021) (“Received; will prepare asap.”); Email from Mr. Lucas to Mr. Kosnoff (Nov. 5, 2021) (“I only made word reject in bold and underscored. Thx. The email and your letter will go out tonight. Thank you.”).

- **TCC Counsel Failed to Take Immediate Corrective Action.** At the November 10 Hearing, Mr. Stang stated that the TCC, immediately upon learning that the TCC/Kosnoff Communication had been distributed to non-Kosnoff clients, took steps to send a follow-up email to the recipients of the TCC/Kosnoff Communications explaining the error in distribution. *See* Ex. 5, Nov. 10, 2021 Hr’g Tr. 21:25-22:7 (“MR. STANG: As soon as I was able to determine that it had gone out to this other list, and I learned that from an attorney who called me and said, hey, my clients got this communication, what is going on, I promptly communicated with Mr. Lucas, and he with our staff, to issue an email to that TCC list saying it was sent to them by mistake, which it was, it was not pursuant to a direction from an attorney in my office, and that it should be disregarded.”). The Debtors are concerned about this characterization of the facts. Mr. Stang and Mr. Lucas were apprised of the distribution of the TCC/Kosnoff Communications by David Molton, counsel to the Coalition, who had himself received the TCC/Kosnoff Communications, including, for the first time, on November 6. Mr. Stang received multiple communications from Mr. Molton on November 6. No actions were taken by anyone PSZJ to send a follow-up email until November 7.
- **TCC Immediately Shared Responses to the TCC/Kosnoff Communications with Kosnoff.** From the production, it appears that Mr. Steven Golden, an attorney at PSZJ, was instructed by Mr. Lucas to forward more than 75 survivor responses to the TCC/Kosnoff Communications directly to Mr. Kosnoff on November 6. *See* Ex. 7, Email from Mr. Lucas to Mr. Golden (Nov. 6, 2021) (“Please send Tim the emails received in response to the mass email that went out yesterday.”); Ex. 8, Email from Mr. Golden to Mr. Kosnoff (Nov. 6, 2021). The Debtors have requested that the TCC produce these communications, as they are directly responsive to the Debtors’ prior discovery requests. Until these documents are received, the Debtors and other interested parties do not have any way of determining whether it was appropriate to forward these communications to Mr. Kosnoff. At a minimum, it does not appear that there was any review of these responses, and there are significant confidentiality and privilege concerns with the TCC’s sharing of these materials with Mr. Kosnoff and future offer of “immediate forwarding or should I send to you in a batch? Happy to do either; whichever is most convenient for you.” *See* Ex. 7.

- **No Pre-Email Evidence Concerning Intended Distribution List.** Nothing in the TCC's production supports the TCC's assertion that instructions were given to send the TCC/Kosnoff Communications only to the Kosnoff client list, except for after-the-fact communications on November 7, well after the direction to send the TCC/Kosnoff Communications was purportedly given and well after the TCC was aware of the confusion it had caused survivors and the concerns raised by other parties. Indeed, Mr. Lucas refers to the communication as a "mass email" in an email he sent to Mr. Golden on November 6. As noted above, the Debtors are waiting for additional discovery that may shed light on this issue.
- **No Diligence to Confirm Kosnoff Email List.** Based on an interrogatory response from the TCC, the Debtors understand that before sending the TCC/Kosnoff Communications, the TCC conducted no diligence concerning the accuracy of Mr. Kosnoff's list of purported clients. In comparison, the Debtors' Solicitation Agent, Omni Agent Solutions, did not include voting abuse survivors on attorneys' master ballots without evidence of such attorneys' representation of a claimant (through a claimant's indication on a proof of claim and/or evidence of an attorney/client relationship (through an engagement letter or otherwise)).
- **No Evidence of Discussions with Ethics Counsel.** During the November 12 hearing, Ms. Grassgreen stated that PSZJ transmitted the TCC/Kosnoff Communications from the official TCC email address only after consultation with ethics counsel, an excerpt of which is attached hereto as **Exhibit 4**. Nov. 12, 2021 Hr'g Tr. at 20:3-5 ("MS. GRASSGREEN: I understand that, Your Honor. I will tell you we did it on advice of ethics counsel. We previously (indiscernible) TCC notices."). However, there is nothing in the TCC's production to support the assertion that ethics counsel was consulted with respect to the transmittal of the TCC/Kosnoff Communications. The Debtors have requested responsive documents.

4. In light of these significant issues raised by the TCC's initial production, the Debtors immediately reached out to the TCC to identify deficiencies in the TCC's responses and production and served supplemental document requests and interrogatories. The parties met and conferred on the matter, and the parties' agreement to consent to the entry of the Proposed Interim Order is subject to the following conditions, which were agreed to by the TCC:

- (a) The parties will proceed with the November 17 hearing on this matter as a status conference before the Court.

- (b) The TCC will comply with the Debtors' November 8 written discovery requests, including remedying certain deficiencies identified by the Debtors.⁵
- (c) The TCC will comply with the Debtors' additional written discovery requests on an expedited basis. (The TCC has agreed to produce all responsive documents on a rolling basis by Friday, November 19. As of this filing, the Debtors have not received any additional documents.)
- (d) Mr. Stang, Mr. Lucas, Mr. Golden, and Mr. Hung Phan will appear for depositions at the times specified by the Debtors or such other times as the parties may mutually agree. (The Debtors have proposed dates but they have not yet been confirmed by the TCC.)

5. The Debtors are continuing to analyze the voting results and how such votes may have been influenced by the improper distribution of the TCC/Kosnoff Communications. At this time, though the data is not complete, preliminary results indicate there may be reason for concern. Additionally, counsel to the Coalition is still gathering votes, which have not yet been tendered to the Solicitation Agent. The Coalition may provide a further update with respect to those votes.

6. The Debtors' agreement with the TCC on the Proposed Interim Order should not be interpreted as providing finality on this matter. The Debtors are in the initial stages of their investigation into the distribution of the TCC/Kosnoff Communications from the official TCC email address. The full results of the TCC's unfortunate actions remain unknown and may prove to be far-reaching and detrimental to the Debtors and their creditors, including survivors, who are entitled to a fair and equitable process.

7. Depending on the results of the investigation, the Debtors are exploring the possibility of seeking further remedies for the damage caused by the improper distribution of the TCC/Kosnoff Communications, including:

⁵ In addition to the documents referenced above, the TCC has agreed to produce all documents and communications between the TCC and Timothy Kosnoff and/or Kosnoff Law – subject to a privilege log for certain periods – without a limitation on date and all responsive text messages and communications between the parties involved, including between Mr. Stang and Mr. Lucas, as set forth in the Debtors' prior discovery requests.

- (a) Sanctioning the TCC through (a) a prohibition on PSZJ's ability to seek payment of its fees and expenses from the Debtors and their estates with respect to any of the firm's fees and expenses incurred related to the distribution of the TCC/Kosnoff Communications and the Debtors' subsequent enforcement of the Solicitation Procedures Order, and (b) a prospective reduction of the TCC's subsequent fees in the amount the Debtors' and other estate fiduciaries' costs and expenses have incurred and continue to incur going forward in investigating the TCC's actions with respect to the TCC/Kosnoff Communications and enforcing the Solicitation Procedures Order against the TCC;
- (b) Relief that may be necessary to address votes that may have been improperly influenced by the TCC/Kosnoff Communications; and
- (c) Any other applicable legal or equitable remedies for, or other relief in connection with, the TCC's actions.

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Dated: November 16, 2021
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Paige N. Topper

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ATTORNEYS FOR THE DEBTORS AND
DEBTORS IN POSSESSION

Exhibit 1

Agreed Proposed Interim Order

**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)

Ref. D.I. 7118, 7119, 7120, 7122

**AGREED INTERIM ORDER ON DEBTORS' MOTION
(I) ENFORCING THE SOLICITATION PROCEDURES ORDER,
(II) ENFORCING SECTION 1103 OF THE BANKRUPTCY CODE AGAINST THE
TORT CLAIMANTS' COMMITTEE, AND (III) GRANTING RELATED RELIEF**

Upon the motion [D.I. 7118] (the "Motion")² of the Debtors for entry of an order (this "Order"), pursuant to sections 105(a), 1103, and 1125 of the Bankruptcy Code, (i) enforcing the Solicitation Procedures Order as set forth herein, (ii) enforcing the terms of section 1103 of the Bankruptcy Code and requiring that any official email address of the Tort Claimants' Committee (the "TCC") be used only for official TCC business applicable to the survivor community and not for the benefit of individual state court counsel, and (iii) granting related relief; and upon the Warner Declaration [D.I. 7119] filed in support of the Motion; and the Joinder [D.I. 7120] filed in support of the Motion by the Coalition of Abused Scouts for Justice (the "Coalition"); and this Court having jurisdiction to consider the Motion in accordance with 28 U.S.C. § 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Debtors having consented to entry of a final order by

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 defined herein shall have the meanings ascribed to them in the Motion.

this Court under Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and appropriate notice of and opportunity for a hearing on the Motion having been given and no other or further notice being necessary; and upon the record herein; and the Court having been advised the Debtors, the Coalition, and the TCC have agreed upon the terms of this Order, IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The Solicitation Procedures Order that was entered by this Court on September 30, 2021 remains in full force and effect, and this Order serves to supplement and work in conjunction with the existing Solicitation Procedures Order.
3. The Solicitation Procedures Order is hereby supplemented to provide as follows:
 - (a) The TCC shall refrain from distributing, for the entirety of the chapter 11 cases, any and all communications from or on behalf of any state court counsel, including, without limitation, to parties on the TCC List or the Kosnoff List, as such lists may be amended, modified, or supplemented from time to time;
 - (b) Any official email address of the TCC, including any email address of counsel to the TCC, shall be used only for official TCC business applicable to the survivor community and not for the benefit of individual state court counsel; and
 - (c) The TCC shall give prior notice to Debtors' and the Coalition's restructuring counsel of any substantive written communications that it intends to distribute to any holder of an abuse claim, including, without limitation, parties on the TCC List or the Kosnoff List, as such lists may be amended, modified, or supplemented from time to time, at least 48 hours prior to distribution (the "Notice Requirement"); *provided* that, without limiting any other provision of this Order, (i) notices of TCC town hall meetings (including topics to be discussed at the TCC town hall meetings) are not subject to the Notice Requirement so long as such notices and topics are posted to the TCC's creditor information website contemporaneously with distribution; (ii) transcripts and recordings of town hall meetings are not subject to the Notice Requirement so long as such transcripts and records are posted to the TCC's creditor information website contemporaneously with distribution; (iii) the Notice Requirement does not

apply to responses to individual survivor questions and inquiries received by the TCC via telephone, email or at the Town Halls; (iv) the Notice Requirement does not apply to individual communications with counsel for a represented survivor or individual communications with an unrepresented survivor and (iv) nothing in this Order affects the rights or privileges of the TCC members to communicate amongst themselves and its members' right to communicate with TCC-retained professionals.

If, upon 48 hours' notice to the Debtors and the Coalition (the "Notice Period") in accordance with the Notice Requirement, the Debtors or the Coalition dispute the propriety or accuracy of any of the proposed communications, the Debtors, the Coalition and TCC shall confer in good faith in an attempt to agree on revised communications. If the Debtors, the Coalition and the TCC are unable to agree to revised communications before the expiration of the Notice Period, the Debtors or the Coalition may seek an expedited hearing with the Court to resolve such disagreement. In that event, the TCC shall not oppose the Debtors' or the Coalition's request for expedited consideration; *provided* that any such hearing is held on not less than 24 hours' notice to the TCC; *provided further* that, if a hearing to consider any appropriate relief in connection with any communications (as may be held on an expedited basis) is requested by the Debtors or the Coalition to be heard within 24 hours' after expiration of the Notice Period but is scheduled for a later date by the Court, the communication at issue shall not be distributed until the hearing concludes. In the event of any dispute regarding the terms of such communications, the Debtors, the Coalition and the TCC reserve any and all rights under the Bankruptcy Code or applicable law.

4. The TCC shall comply with all requests for discovery related to the TCC/Kosnoff Communications and the circumstances related thereto, whether served by the Debtors, the Coalition, or any other party in interest, including causing individuals over whom it has control to appear for depositions; *provided*, that if the TCC objects to any request for discovery, and the parties are unable to resolve the dispute despite reasonable efforts, the party requesting the discovery or the TCC may raise the dispute to the Court on an expedited basis.

5. Notwithstanding anything to the contrary in the Motion or this Order, the Debtors, on behalf of themselves and their estates, and the Coalition retain all rights to seek any further and other applicable legal or equitable remedies for, or other relief in connection with, the TCC's actions, and the Debtors' and/or the Coalition's failure to request any such relief in the Motion or

the Joinder or the omission of any such relief from this Order shall not preclude the Debtors, the Coalition, or any other party from later seeking such relief in accordance with applicable law and rules.

6. The Debtors, the Coalition and TCC are authorized to take all action necessary to effectuate the relief granted in this Order.

7. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Exhibit 2

Redline of Agreed Proposed Interim Order

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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.

Chapter 11

Case No. 20-10343 (LSS)

(Jointly Administered)

Ref. D.I. ~~---~~[7118, 7119, 7120, 7122](#)

AGREED INTERIM ORDER ON DEBTORS' MOTION

**(I) ENFORCING THE SOLICITATION PROCEDURES ORDER,
(II) ENFORCING SECTION 1103 OF THE BANKRUPTCY CODE AGAINST THE
TORT CLAIMANTS' COMMITTEE, AND (III) GRANTING RELATED RELIEF**

Upon the motion [\[D.I. 7118\]](#) (the "Motion")² of the Debtors for entry of an order (this "Order"), pursuant to sections 105(a), 1103, and 1125 of the Bankruptcy Code, (i) enforcing the Solicitation Procedures Order as set forth herein, (ii) enforcing the terms of section 1103 of the Bankruptcy Code and requiring that any official email address of the Tort Claimants' Committee (the "TCC") be used only for official TCC business applicable to the survivor community and not for the benefit of individual state court counsel, and (iii) granting related relief; and upon the Warner Declaration [\[D.I. 7119\]](#) filed in support of the Motion; [and the Joinder \[D.I. 7120\] filed in support of the Motion by the Coalition of Abused Scouts for Justice \(the "Coalition"\)](#); and this Court having jurisdiction to consider the Motion in accordance with 28 U.S.C. § 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Debtors having consented to entry of a final order by

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² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

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this Court under Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and appropriate notice of and opportunity for a hearing on the Motion having been given and no other or further notice being necessary; and upon the record herein; and ~~all objections, if any, to the Motion having been withdrawn, resolved or overruled; and the relief requested in the Motion being in the best interests of the Debtors' estates, their creditors and other parties in interest; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor~~the Court having been advised the Debtors, the Coalition, and the TCC have agreed upon the terms of this Order, IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The Solicitation Procedures Order that was entered by this Court on September 30, 2021 remains in full force and effect, and this Order serves to supplement and work in conjunction with the existing Solicitation Procedures Order.
3. The Solicitation Procedures Order is hereby supplemented to provide as follows:
 - (a) The TCC shall refrain from distributing, for the entirety of the chapter 11 cases, any and all communications from or on behalf of any state court counsel, including without limitation, to parties on ~~its official listserv~~the TCC List or the Kosnoff List, as such lists may be amended, modified, or supplemented from time to time;
 - (b) Any official email address of the TCC, including any email address of counsel to the TCC, shall be used only for official TCC business applicable to the survivor community and not for the benefit of individual state court counsel; and
 - (c) The TCC shall give prior notice to ~~the Debtors' and the Coalition's~~ restructuring counsel of any substantive written communications that it intends to distribute to any holder of an abuse claim, including, without limitation, parties on the ~~listserv~~TCC List or the Kosnoff List, as such lists may be amended, modified, or supplemented from time to time, at least 48

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hours prior to distribution: (the “Notice Requirement”); provided that, without limiting any other provision of this Order, (i) notices of TCC town hall meetings (including topics to be discussed at the TCC town hall meetings) are not subject to the Notice Requirement so long as such notices and topics are posted to the TCC’s creditor information website contemporaneously with distribution; (ii) transcripts and recordings of town hall meetings are not subject to the Notice Requirement so long as such transcripts and records are posted to the TCC’s creditor information website contemporaneously with distribution; (iii) the Notice Requirement does not apply to responses to individual survivor questions and inquiries received by the TCC via telephone, email or at the Town Halls; (iv) the Notice Requirement does not apply to individual communications with counsel for a represented survivor or individual communications with an unrepresented survivor and (v) nothing in this Order affects the rights or privileges of the TCC members to communicate amongst themselves and its members’ right to communicate with TCC-retained professionals.

If, upon 48 hours’ notice to the Debtors and the Coalition (the “Notice Period”) in accordance with the Notice Requirement, the Debtors or the Coalition dispute the propriety or accuracy of any of the proposed communications, ~~and the Debtors and~~ the Coalition and TCC shall confer in good faith in an attempt to agree on revised communications. If the Debtors, the Coalition and the TCC are unable to agree to revised communications before the expiration of the Notice Period, the Debtors or the Coalition may seek an expedited hearing with the Court to resolve such disagreement. In that event, the TCC shall not oppose the Debtors’ or the Coalition’s request for expedited consideration; *provided* that any such hearing is held on not less than 24 hours’ notice to the ~~Fort~~ TCC; *provided further* that, if a hearing to consider any appropriate relief in connection with any communications (as may be held on an expedited basis) is requested by the Debtors or the Coalition to be heard within 24 hours’ after expiration of the Notice Period but is scheduled for a later date by the Court, the communication at issue shall not be distributed until the hearing concludes. In the event of any dispute regarding the terms of such communications, the Debtors, the Coalition and the TCC reserve any and all rights under the Bankruptcy Code or applicable law.

4. The TCC shall ~~send a corrective email clarifying the mistake and stating that the TCC does not endorse the sections of the TCC/Kosnoff Letter that are misleading or false, including those statements that attack another attorney in these chapter 11 cases. The email shall attach the letters approved by this Court in connection with the Disclosure Statement from the~~

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~~Debtors, the Coalition, and the FCR. Such corrective email shall state substantially the following:~~ comply with all requests for discovery related to the TCC/Kosnoff Communications and the circumstances related thereto, whether served by the Debtors, the Coalition, or any other party in interest, including causing individuals over whom it has control to appear for depositions; provided, that if the TCC objects to any request for discovery, and the parties are unable to resolve the dispute despite reasonable efforts, the party requesting the discovery or the TCC may raise the dispute to the Court on an expedited basis.

~~To all concerned:~~

~~My firm sent an email from Mr. Kosnoff to all individuals on this listserv on November 6, 2021. We urge each of you to disregard its contents, which included false and misleading statements that are inconsistent with the Court-approved Disclosure Statement. Many of you have counsel who represent your interests and who have very different opinions as to how you should vote on the Boy Scouts' plan of reorganization. In fact, we understand that counsel representing a majority of the survivors in these cases support the plan and are urging their clients to vote "YES" on the plan. We are not trying to interfere with the advice that you are receiving from your own counsel, and if you have questions on how to vote on the plan, we strongly encourage you to seek advice from your counsel. If you would like to change your vote on the Boy Scouts' plan, you must submit a new ballot on or prior to the Voting Deadline of December 14, 2021 at 4:00 p.m. (Eastern Time). Furthermore, the TCC does not agree with and affirmatively rejects any and all statements made about the Eisenberg Rothweiler law firm in the letter from Mr. Kosnoff that was attached to the email sent to you. The TCC regrets any suggestion that its counsel endorsed the distribution of such statements. Finally, please see the attached letters from the Debtors, FCR and Coalition of Abused Scouts for Justice.~~

5. Notwithstanding anything to the contrary in the Motion or this Order, the Debtors, on behalf of themselves and their estates, and the Coalition retain all rights to seek any further and other applicable legal or equitable remedies for, or other relief in connection with, the TCC's actions ~~and the harm caused by those actions~~, and the Debtors' and/or the Coalition's failure to

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request any such relief in the Motion [or the Joinder](#) or the omission of any such relief from this Order shall not preclude the Debtors, [the Coalition](#), or any other party from later seeking such relief in accordance with applicable law and rules.

6. The Debtors, [the Coalition and TCC](#) are authorized to take all action necessary to effectuate the relief granted in this Order ~~in accordance with the Motion~~.

7. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

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Exhibit 3

November 5, 2021 Email from John Lucas to Timothy Kosnoff

From: "John W. Lucas"

To: "'Timothy Kosnoff'" <tim@kosnoff.com>

Subject: RE: Eisenberg Rothweiler, P.C.: Boy Scouts of America Bankruptcy - Plan Voting

Date: Fri, 05 Nov 2021 23:12:31 -0000

Importance: Normal

Send me your letter. Also, send me what you want stated in the email. Please. Need it asap before my staff leaves.

John W. Lucas

Pachulski Stang Ziehl & Jones LLP

Direct Dial: 415.217.5108

Tel: 415.263.7000 | Cell: 415.306.3576 | Fax: 415.263.7010

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[vCard](#) | [Bio](#) | [LinkedIn](#)



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From: Timothy Kosnoff [mailto:tim@kosnoff.com]

Sent: Friday, November 05, 2021 4:12 PM

To: John W. Lucas <jlucas@pszjlaw.com>

Subject: Re: Eisenberg Rothweiler, P.C.: Boy Scouts of America Bankruptcy - Plan Voting

Yes! Send it. Can you append it to your two dashboards? Is there more I should add to the letter. I think it's imperative to get it out immediately.

Sent from my iPhone

On Nov 5, 2021, at 4:02 PM, John W. Lucas <jlucas@pszjlaw.com> wrote:

Want us to help you resend your letter?

John W. Lucas

Pachulski Stang Ziehl & Jones LLP

Direct Dial: 415.217.5108

Tel: 415.263.7000 | Cell: 415.306.3576 | Fax: 415.263.7010

jlucas@pszjlaw.com

[vCard](#) | [Bio](#) | [LinkedIn](#)



Los Angeles | San Francisco | Wilmington, DE | New York | Houston

From: Timothy Kosnoff [<mailto:tim@kosnoff.com>]

Sent: Friday, November 05, 2021 3:51 PM

To: John W. Lucas <jlucas@pszjlaw.com>

Subject: Fwd: Eisenberg Rothweiler, P.C.: Boy Scouts of America Bankruptcy - Plan Voting

Sent from my iPhone

Begin forwarded message:

From: [REDACTED] <[REDACTED]>

Date: November 5, 2021 at 3:26:47 PM PDT

To: [REDACTED] <[REDACTED]>

Subject: Fwd: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

----- Forwarded message -----

From: [REDACTED] <[REDACTED]>

Date: Fri, Nov 5, 2021 at 4:48 PM

Subject: [REDACTED]

To: <[REDACTED]>

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Exhibit 4

Excerpt of November 12, 2021 Hearing Transcript

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

IN RE: . Chapter 11
. Case No. 20-10343 (LSS)
BOY SCOUTS OF AMERICA AND .
DELAWARE BSA, LLC, .
. Courtroom No. 2
. 824 North Market Street
. Wilmington, Delaware 19801
. Debtors. . Friday, November 12, 2021
. 10:00 A.M.

TRANSCRIPT OF OMNIBUS HEARING
BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN
UNITED STATES BANKRUPTCY JUDGE

APPEARANCES:

For the Debtor: Derek Abbott, Esquire
MORRIS, NICHOLS, ARSHT & TUNNELL LLP
1201 North Market Street, 16th Floor
Wilmington, Delaware 19899

- and -

Jessica C. Lauria, Esquire
Glenn Kurtz, Esquire
WHITE & CASE LLP
1221 Avenue of the Americas
New York, New York 10020

Audio Operator: LaCrisha Harden, ECRO

Transcription Company: Reliable
1007 N. Orange Street
Wilmington, Delaware 19801
(302) 654-8080
Email: gmatthews@reliable-co.com

Proceedings recorded by electronic sound recording; transcript
produced by transcription service.

1 problematic. There are three law firms that represent those
2 clients and you only had permission from one.

3 MS. GRASSGREEN: I understand that, Your Honor. I
4 will tell you we did it on advice of ethics counsel. We
5 previously (indiscernible) TCC notices.

6 THE COURT: That is really interesting that you
7 felt the need to get advice of ethics counsel for that. That
8 is very telling. And I will be interested in hearing that
9 advice that the committee got because I find that very
10 problematic especially because the committee knows that the
11 lawyers disagree. The lawyers disagree, the committee knows
12 it.

13 The committee turned a private attorney/client
14 communication that was not a solicitation into a solicitation
15 endorsed by the committee. The question is what do I do about
16 it that doesn't create more confusion, that doesn't prejudge
17 issues that are in front of me, but you can hear my very
18 strong preliminary thoughts?

19 How do I, because I have the preliminary thoughts I
20 have, permit a letter to go to clients, forget for the moment
21 the non-clients, but the clients in what I think could be a
22 breach of professional ethics?

23 MS. GRASSGREEN: Well, Your Honor, if I could, we
24 don't want to create more problems. We are really, really
25 working hard, and we did work hard with the parties, to try to

1 but it wasn't signed by us, what does that mean to you?

2 MS. GRASSGREEN: Well, the re line said, see
3 attached communication from Kosnoff, right; it didn't say --
4 so, it was a transmission and I think there's a difference
5 between us transmitting someone else's statement. If one says
6 to me, would you forward the email that so and so sent you,
7 doesn't mean that I've adopted or endorsed what's in the
8 email; it means that I've forwarded it.

9 THE COURT: And what does that mean?

10 That's sort of like the people who say, oh, I
11 didn't view the whole tweet to see what it says; I just re-
12 tweeted it.

13 MS. GRASSGREEN: Well, I -- your question was, is
14 it our communication and we don't think it was.

15 THE COURT: I guess I would -- you should be
16 prepared --

17 MS. GRASSGREEN: A consequence of us forwarding it
18 are clear -- are becoming clearer and, again -- but that's for
19 Wednesday. And if there's needs to be an order saying, we did
20 all these wrong things -- we're not asking you to find that it
21 was not false today. We're not asking you to find that it was
22 not misleading. We are not asking you to find that it was not
23 defamatory.

24 But we're not asking you to find that it -- they're
25 asking you to say that it is by asking us to admit it and

1 counsel. We are adjourned.

2 COUNSEL: Thank you, Your Honor.

3 (Proceedings concluded at 12:09 p.m.)

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CERTIFICATE

9

10 We certify that the foregoing is a correct transcript
11 from the electronic sound recording of the proceedings in the
12 above-entitled matter.

13

14 /s/Mary Zajaczkowski November 12, 2021
Mary Zajaczkowski, CET**D-531

15

16 /s/William J. Garling November 12, 2021
William J. Garling, CE/T 543

17

18 /s/ Tracey J. Williams November 12, 2021
Tracey J. Williams, CET-914

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Exhibit 5

Excerpt of November 10, 2021 Hearing Transcript

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

IN RE:	.	Chapter 11
	.	Case No. 20-10343 (LSS)
BOY SCOUTS OF AMERICA AND	.	
DELAWARE BSA, LLC,	.	(Jointly Administered)
	.	
Debtors.	.	
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.	
	.	Adversary Proceeding No.
BOY SCOUTS OF AMERICA,	.	20-50527 (LSS)
	.	
Plaintiff,	.	
	.	
v.	.	
	.	
A.A., et al.,	.	Courtroom 2
	.	824 Market Street
Defendants.	.	Wilmington, Delaware 19801
	.	
	.	Wednesday, November 10, 2021
.	10:05 a.m.

TRANSCRIPT OF ZOOM HEARING
BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN
CHIEF UNITED STATES BANKRUPTCY JUDGE

Electronically
Recorded By: Brandon J. McCarthy, ECRO

Transcription Service: Reliable
1007 N. Orange Street
Wilmington, Delaware 19801
Telephone: (302) 654-8080
E-Mail: gmatthews@reliable-co.com

Proceedings recorded by electronic sound recording:
transcript produced by transcription service.

1 and we intend to answer the discovery. Ms. Lauria, in one of
2 her letters, set a deadline for answering, at the time,
3 unspecified discovery, but it consists of interrogatories and
4 requests for production of documents. And because this deals
5 with, at least some of it deals with a fairly circumscribed
6 period of time, essentially this past weekend, we have every
7 intention of responding as quickly as possible. And I mean
8 as quickly as possible.

9 So we will be open about what happened and our
10 explanation, if it's not satisfactory in the form of a
11 letter, will be answered in interrogatories and, frankly,
12 ongoing communications with the debtor.

13 As the parties have noted, this -- we have an
14 unprecedented solicitation campaign going on between the tort
15 claimants committee and those who oppose the plan, and the
16 coalition, and those who support the plan. This backdrop
17 includes, in my experience, fairly sophisticated websites, we
18 have one, the coalition has one; weekly town hall meetings
19 previously to the last maybe month we were doing them
20 monthly. Those town hall meetings were announced in using
21 our list serve. The coalition has now weekly town hall
22 meetings, at least I believe they are weekly. They are
23 certainly periodic. And it has even gotten to the point of
24 having, in effect, dueling YouTube videos.

25 This motion concerns one email that was written by

1 Mr. Kosnoff. We had no participation in the writing of it.
2 It was signed by Mr. Kosnoff, though it's probably the
3 digital type signature, but we did transmit it. It was
4 transmitted to a subset of the constituency. It was sent to
5 a client list that Mr. Kosnoff had provided to us. He
6 provided it to us some time ago, I think it was just after --
7 I'm not sure of the exact timing, but we had used it to send
8 out announcements of our town halls. Then it was also sent
9 to, what I refer to as, the TCC list.

10 By the way, Mr. Kosnoff gave us written authority
11 to use the, what I will call, Kosnoff list which consists of
12 what he represented to be his clients where he was co-counsel
13 with other parties, but we have expressed written authority
14 from him to use it.

15 As to what I call the TCC list, it consists of,
16 obviously, coalition lawyers, because Mr. Molton said that he
17 received it, and has always had them on it for some
18 substantial period of time parties who are unrepresented
19 which we gartered from the proof of claim forms. And also
20 individuals who over the last almost two years have contacted
21 us saying they want to be kept apprised of what was going on
22 in the case. These are generalities, Your Honor. I don't
23 know if we're going to get into discovery that explains each
24 and every person on what I call the TCC list, but those are
25 generally how the two lists fall out.

1 responsibility entails we will eventually see. I wanted you
2 to hear our explanation of, at least, some of the facts
3 regarding who it went out to and our attitude towards the
4 things that are in Mr. Kosnoff's twitter that it was not
5 something we ascribe to.

6 So with that, Your Honor, I don't -- unless you
7 have questions of me, which I am more than happy to answer,
8 we consent to the shortened time, we will do everything in
9 our power to answer the discovery quickly and we will
10 continue our conversations with the debtor, and the
11 coalition, and the FCR to try to reach a resolution of this.

12 I should say one other thing, Judge, just so you
13 appreciate what happened. My first understanding of -- my
14 first awareness that there was a response to what we had sent
15 out was from Mr. Molton and he called me, I was not in a
16 position to take the phone call, but when I saw the other
17 communications, and we did speak once, I thought it was about
18 his objection to the communication going out, what I call,
19 the Kosnoff list which are the AIS claims which we believe,
20 at least in terms of the communication, a communication with
21 them we were entitled to make because Mr. Kosnoff had given
22 us his consent.

23 I was not aware that it had gone out to, what I
24 call, the TCC list. That was not our instruction when we
25 communicated with staff. As soon as I was able to determine

1 that it had gone out to this other list, and I learned that
2 from an attorney who called me and said, hey, my clients got
3 this communication, what is going on, I promptly communicated
4 with Mr. Lucas, and he with our staff, to issue an email to
5 that TCC list saying it was sent to them by mistake, which it
6 was, it was not pursuant to a direction from an attorney in
7 my office, and that it should be disregarded.

8 It was a short email, it did not elaborate beyond
9 that. So, again, within the context of communicating with
10 the people on the TCC list we attempted to mitigate the
11 effect of the communication.

12 So, Your Honor, that is what I wanted to say to
13 you today. And as I said, I am prepared to answer any
14 question you have regarding this to the best of my knowledge.

15 THE COURT: Thank you. I am not asking any
16 questions today. I have not had a chance to review in detail
17 what was filed. I certainly suspect I will have questions.

18 Mr. Hogan.

19 MR. HOGAN: Good morning, Your Honor. Daniel
20 Hogan of Hogan McDaniel on behalf of Eisenberg, Rothweiler,
21 Winkler, Eisenberg & Jeck.

22 Your Honor, I will be brief. I just wanted the
23 court to understand that my clients, Eisenberg, Rothweiler,
24 is the firm that has been implicated by this defamatory email
25 that was sent out by the TCC. The vote -- the AIS votes

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CERTIFICATION

I certify that the foregoing is a correct transcript from the electronic sound recording of the proceedings in the above-entitled matter to the best of my knowledge and ability.

/s/ William J. Garling

November 10, 2021

William J. Garling, CET**D-543
Certified Court Transcriptionist
For Reliable

Exhibit 6

November 5, 2021 Emails from John Lucas to Timothy Kosnoff

From: Timothy Kosnoff <Tim@kosnoff.com>
To: "John W. Lucas" <jlucas@pszjlaw.com>
Subject: Re: Kosnoff Law Letter to BSA Clients
Date: Fri, 5 Nov 2021 17:11:53 -0700
Importance: Normal

Thanks John. I just noticed that I had omitted the most important thing: **VOTE TO REJECT**.

TIMOTHY D. KOSNOFF
Licensed Attorney

U.S. Mailing address:

1321 Upland Drive
PMB 4685
Houston, TX 77043
USA

Direct: 425-837-9690
Main: 206-257-3590
Fax: 206-837-9690
Toll free: 855-LAW4CSA

tim@kosnoff.com

www.kosnoff.com (sexual abuse in focus website)

If you'd like to connect with me on Twitter my feed is:

<http://twitter.com/SexAbuseAttys>

CONFIDENTIALITY NOTICE: This email and any attachments may contain confidential or attorney-client protected information that may not be further distributed by any means without permission of the sender. If you are not the intended recipient, you are hereby notified that you are not permitted to read its content and that any disclosure, copying, printing, distribution or use of any of the information is prohibited. If you have received this email in error, please immediately notify the sender by return e-mail and delete the message and its attachments without saving in any manner.

On Fri, Nov 5, 2021 at 5:08 PM John W. Lucas <jlucas@pszjlaw.com> wrote:

I only made word reject in bold and underscored. Thx. The email and your letter will go out tonight. Thank you.

John W. Lucas

Pachulski Stang Ziehl & Jones LLP

Direct Dial: 415.217.5108<tel:415.217.5108>

Tel: 415.263.7000<tel:415.263.7000> | Cell: 415.306.3576<tel:415.306.3576> | Fax:

415.263.7010<tel:415.263.7010>

jlucas@pszjlaw.com<mailto:jlucas@pszjlaw.com>

vCard<<http://www.pszjlaw.com/vcard-106.vcf>> | Bio<<http://www.pszjlaw.com/attorneys-john-w-lucas.html>> | LinkedIn<<https://www.linkedin.com/pub/john-lucas/46/245/594>>

Los Angeles | San Francisco | Wilmington, DE | New York

On Nov 5, 2021, at 5:00 PM, Timothy Kosnoff <tim@kosnoff.com> wrote:

Ok to send. I don't need to see your edits. I'm certain they are excellent.

TIMOTHY D. KOSNOFF
Licensed Attorney

U.S. Mailing address:

1321 Upland Drive
PMB 4685
Houston, TX 77043
USA

Direct: 425-837-9690
Main: 206-257-3590
Fax: 206-837-9690
Toll free: 855-LAW4CSA

tim@kosnoff.com<mailto:tim@kosnoff.com>

www.kosnoff.com<<http://www.kosnoff.com>> (sexual abuse in focus website)

If you'd like to connect with me on Twitter my feed is:
<http://twitter.com/SexAbuseAttys><<http://twitter.com/SexAbuseAttys>>

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On Fri, Nov 5, 2021 at 4:30 PM John W. Lucas <jlucas@pszjlaw.com<mailto:jlucas@pszjlaw.com>>>
wrote:
Received; will prepare asap.

John W. Lucas
Pachulski Stang Ziehl & Jones LLP
Direct Dial: 415.217.5108
Tel: 415.263.7000 | Cell: 415.306.3576 | Fax: 415.263.7010
jlucas@pszjlaw.com<mailto:jlucas@pszjlaw.com>
vCard<<http://www.pszjlaw.com/vcard-106.vcf>> | Bio<<http://www.pszjlaw.com/attorneys-john-w-lucas.html>> | LinkedIn<<https://www.linkedin.com/in/john-lucas-59424546>>

[X]<<http://www.pszjlaw.com/>>
Los Angeles | San Francisco | Wilmington, DE | New York | Houston

From: Timothy Kosnoff [mailto:Tim@kosnoff.com<mailto:Tim@kosnoff.com>]

Sent: Friday, November 05, 2021 4:29 PM

To: John W. Lucas <jlucas@pszjlaw.com><<mailto:jlucas@pszjlaw.com>>>

Subject: Kosnoff Law Letter to BSA Clients

John,

Attached is the letter.

The email could say this:

Dear Clients of AIS,

Today the eBallot went out to you a few minutes ago from Eisenberg Rothweiler. I was not expecting it to be sent by that firm. I was not given an opportunity to review it and the reason is because that firm knew I would have objected to its form and content. It was wholly improper and possibly illegal for them to solicit your vote on a ballot which is supposed to be neutral. Instead they used deceit to spew their patently false and misleading statements. There is a simple word for why lawyers do things like that:greed.

Please find the link to my October 19, 2021 letter urging you to reject the Plan. I ask you respectfully to read my letter again. If you do, I am confident you will reach the same conclusions I did.

Please stay current on what is happening by following me on Twitter @sexabuseattys. Please feel free to call me or email me with any questions you may have. My email is tim@kosnoff.com<<mailto:tim@kosnoff.com>>. My cell number is 425-830-8201 Listen to the lawyer that listens to you and returns your phone call.

Thank you.

Timothy Kosnoff

TIMOTHY D. KOSNOFF
Licensed Attorney

U.S. Mailing address:

1321 Upland Drive
PMB 4685
Houston, TX 77043
USA

Direct: 425-837-9690
Main: 206-257-3590
Fax: 206-837-9690
Toll free: 855-LAW4CSA

tim@kosnoff.com<<mailto:tim@kosnoff.com>>

www.kosnoff.com<<http://www.kosnoff.com>> (sexual abuse in focus website)

If you'd like to connect with me on Twitter my feed is:
<http://twitter.com/SexAbuseAttys><<http://twitter.com/SexAbuseAttys>>

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sender. If you are not the intended recipient, you are hereby notified that you are not permitted to read its content and that any disclosure, copying, printing, distribution or use of any of the information is prohibited. If you have received this email in error, please immediately notify the sender by return e-mail and delete the message and its attachments without saving in any manner.

Exhibit 7

November 6 Email from John Lucas to Steven Golden

From: "Steven W. Golden" <sgolden@pszjlaw.com>

To: "John W. Lucas" <jlucas@pszjlaw.com>

Cc: Tim Kosnoff <tim@kosnoff.com>

Subject: RE: BSA - Kosnoff AIS Survivor Client Emails

Date: Sat, 6 Nov 2021 13:39:17 -0400

Importance: Normal

Inline-Images: image001.jpg

Will do.

Tim, I will put together a ZIP file of the emails I have now. For any ones in the future, would you prefer immediate forwarding or should I send to you in a batch? Happy to do either; whichever is most convenient for you.

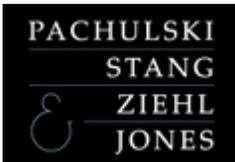
--Steve

Steven W. Golden

Pachulski Stang Ziehl & Jones LLP

Tel: 212.561.7715 | Fax: 212.561.7777 | Mobile: 301.706.7520

sgolden@pszjlaw.com



Los Angeles | San Francisco | Wilmington, DE | New York | Houston

From: John W. Lucas

Sent: Saturday, November 06, 2021 1:37 PM

To: Steven W. Golden <sgolden@pszjlaw.com>

Cc: Tim Kosnoff <tim@kosnoff.com>

Subject: BSA - Kosnoff AIS Survivor Client Emails

Steve,

Please send Tim the emails received in response to the mass email that went out yesterday.

Thanks,

John

John W. Lucas

Pachulski Stang Ziehl & Jones LLP

Direct Dial: 415.217.5108

Tel: 415.263.7000 | Cell: 415.306.3576 | Fax: 415.263.7010

jlucas@pszjlaw.com

[vCard](#) | [Bio](#) | [LinkedIn](#)



Los Angeles | San Francisco | Wilmington, DE | New York | Houston

Exhibit 8

November 6 Email from Steven Golden to Timothy Kosnoff

From: "Steven W. Golden" <sgolden@pszjlaw.com>

To: Tim Kosnoff <tim@kosnoff.com>

Cc: "John W. Lucas" <jlucas@pszjlaw.com>

Subject: RE: File Delivered: TK Emails.zip

Date: Sat, 6 Nov 2021 18:23:11 -0400

Importance: Normal

Inline-Images: image001.jpg

Tim,

Wanted to confirm you were able to receive the emails below. I have about 75 more since I sent the below, but just want to confirm the method of sending to you worked before I do the same again.

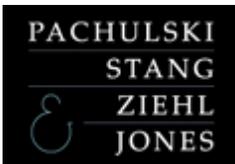
--Steve

Steven W. Golden

Pachulski Stang Ziehl & Jones LLP

Tel: 212.561.7715 | Fax: 212.561.7777 | Mobile: 301.706.7520

sgolden@pszjlaw.com



Los Angeles | San Francisco | Wilmington, DE | New York | Houston

From: Steven W. Golden

Sent: Saturday, November 06, 2021 2:05 PM

To: Tim Kosnoff <tim@kosnoff.com>

Cc: John W. Lucas <jlucas@pszjlaw.com>

Subject: FW: File Delivered: TK Emails.zip

Tim,

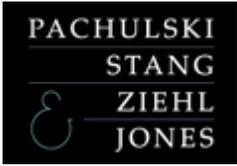
Please see link below. Please let me know if you have any trouble accessing.

Steven W. Golden

Pachulski Stang Ziehl & Jones LLP

Tel: 212.561.7715 | Fax: 212.561.7777 | Mobile: 301.706.7520

sgolden@pszjlaw.com



Los Angeles | San Francisco | Wilmington, DE | New York | Houston

From: Hightail [<mailto:delivery@spaces.hightailmail.com>]

Sent: Saturday, November 06, 2021 2:03 PM

To: Steven W. Golden <sgolden@pszjlaw.com>

Subject: File Delivered: TK Emails.zip



You have shared 1 file.

1 file

•

16.9 MB total

•

Shared on 11/06/2021

Your files have been delivered to the following recipient:

itdepartment@pszjlaw.com



ZIP

TK Emails.zip

16.9 MB

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