

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

In re:

Boy Scouts of America and Delaware BSA,
LLC,

Debtors.

Case No. 20-10343 (LSS)

Chapter 11

Jointly Administered

**JOINDER OF THE DIOCESE OF BUFFALO, N.Y., TO THE ROMAN
CATHOLIC AD HOC COMMITTEE'S OBJECTION TO THE DEBTORS'
MOTION FOR AUTHORIZATION TO ENTER INTO AND PERFORM UNDER
RESTRUCTURING SUPPORT AGREEMENT AND FOR RELATED RELIEF**

The Diocese of Buffalo, N.Y., Chapter 11 Debtor-in-Possession, Western District of New York Bankruptcy Court, Case No. 20-10322 (the "Buffalo Diocese") by and through the undersigned counsel, hereby joins *Joint Objection of the Roman Catholic Ad Hoc Committee and the United Methodist Ad Hoc Committee to the Debtor's Motion for Authorization to Enter into and Perform Under Restructuring Support Agreement and for Related Relief and Joinder in Limited Objection and Reservation of Rights of the Church of Jesus Christ of Latter-Day Saints* [Docket No. 5676] (the "Catholic Committee Objection"). In support thereof, the Buffalo Diocese respectfully states as follows:

JOINDER

1. The Buffalo Diocese and/or certain parishes within the geographic footprint of the Buffalo Diocese have been involved in supporting and facilitating the scouting programs of the Boy Scouts of America and Delaware BSA, LLC (collectively, the "Debtors").

2. The Buffalo Diocese respectfully joins the arguments raised in the Catholic Committee Objection and adopts and incorporates such arguments as if more fully set forth herein.

3. The Buffalo Diocese respectfully requests that this Court deny the relief sought by the Debtors through the *Debtors' Motion For Entry of an Order, Pursuant to Sections 363(b) and*

105(a) of the Bankruptcy Code, (I) Authorizing the Debtors to Enter Into and Perform Under the Restructuring Support Agreement, and (II) Granting Related Relief [Docket No. 5466] (the “RSA Motion”) for the reasons set forth in the Catholic Committee Objection and incorporated herein by reference.

4. The Buffalo Diocese respectfully reserves the right to raise and present additional authorities, arguments, evidence, and objections in connection with the matters addressed in the foregoing pleadings or that may arise during the hearing. In the event that the Catholic Committee Objection is withdrawn or otherwise resolved, the Buffalo Diocese further reserves the right to present argument on the RSA Motion at the hearing.

Dated: July 22, 2021

GELLERT SCALI BUSENKELL & BROWN LLC

/s/ Charles J. Brown, III

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Counsel for The Diocese of Buffalo, N.Y.

CERTIFICATE OF SERVICE

I, Charles J. Brown, III, Esquire, certify that on July 22, 2021, I caused a true and correct copy of *Joinder of the Diocese of Buffalo, N.Y. to the Roman Catholic Ad Hoc Committee's Objection to the Debtors' Motion for Authorization to Enter Into and Perform Under the Restructuring Support Agreement and for Related Relief* to be electronically filed and served via CM/ECF to all parties requesting electronic service in this case and upon the parties listed below via electronic mail:

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/s/ Charles J. Brown, III
Charles J. Brown, III (DE 3368)

Dated: July 22, 2021