

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

In re:

BOY SCOUTS OF AMERICA AND
DELAWARE BSA, LLC,

Debtors.¹

Chapter 11

Case No. 20-10343 (LSS)

(Jointly Administered)

Re: D.I. 6813

**NOTICE OF ORAL DEPOSITION OF MARK EVELAND
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(b)(1)**

**TO: Mark Eveland, Chief Executive Officer of Verus LLC
c/o Michael A. Kaplan, Lowenstein Sandler LLP (mkaplan@lowenstein.com)
1251 Avenue of the Americas, New York, New York 10020**

TAKE NOTICE that Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America and Indemnity Insurance Company of North America (“Century”), pursuant to Fed. R. Civ. P. 30, made applicable to this proceeding pursuant to Federal Rules of Bankruptcy 7030 and 9014, will take the deposition upon oral examination of Mark Eveland in connection with *Century’s Letter to Judge Silverstein Compelling Verus* [D.I. 6813], *Verus’ Letter to Judge Silverstein in Opposition to Century’s Letter to Compel Verus*, [D.I. 6945], the *Eveland Declaration in Support of Verus’s Opposition to Century’s Letter* [D.I. 6946], and the *Modified Fifth Amended Chapter 11 Plan Of Reorganization For Boy Scouts Of America And Delaware BSA, LLC* [D.I. 6443].

¹ The Debtors in these Chapter 11 Cases, together with the last four digits of 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.

The deposition will commence on December 3, 2021 at 10:00 a.m. (Prevailing Eastern Time) via Zoom via a link to be circulated in advance. The deposition shall continue from day-to-day (Saturdays, Sundays, and holidays excluded), or as otherwise agreed by the parties, until completed. The deposition shall be taken upon oral examination before an officer authorized by law to administer oaths via remote video conference, and will be recorded by videographer and/or by stenographic means.

PLEASE TAKE FURTHER NOTICE that:

1. The deposition will be conducted remotely, using audio-visual conference technology;
2. The court reporter will either report the deposition from the same location as the witness or a location separate from the witness and will remotely administer the oath to the witness;
3. Counsel for the parties and their clients will participate either from the same location or from separate locations but if they appear from the same location as their clients then the lawyer or lawyers questioning the deponent may also be present at that location;
4. The witness may be required to provide government-issued identification, which must be legible on camera;
5. Each participating attorney may be visible to all other participants, and their statements will be audible to all participants;
6. All exhibits will be provided simultaneously and, if the deposition is conducted remotely, electronically to the witness and all participants;
7. The court reporter will record the testimony;

8. The deposition may be recorded by stenographic, electronic, and/or visual means;
and

9. Counsel for all parties will be required to stipulate on the record their consent to this manner of deposition and their waiver of any objection to this manner of taking the deposition, including any objection to the admissibility at trial of this testimony based on the manner of remote deposition taking.

Dated: November 30, 2021

Respectfully Submitted,

By: /s/ Stamatios Stamoulis
Stamatios Stamoulis (#4606)

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*Counsel for Century Indemnity Company, as
successor to CCI Insurance Company, as
successor to Insurance Company of North
America and Indemnity Insurance Company of
North America*

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing document was electronically served on all counsel of record, on this 30th day of November, 2021, in accordance with the Federal Rules of Civil Procedure.

Stamatios Stamoulis
Stamatios Stamoulis