

**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)

Re: D.I. 6210

**NOTICE OF FILING OF REVISED SCHEDULES TO
HARTFORD TERM SHEET AND TCJC TERM SHEET**

PLEASE TAKE NOTICE that, on September 14, 2021, the Mediators filed the *Sixth Mediators' Report* [D.I. 6210] (the "Report").²

PLEASE TAKE FURTHER NOTICE that attached to the Report as Exhibit A was the Hartford Term Sheet. Attached to the Hartford Term Sheet as Schedule 1 was a list of State Court Counsel that have each agreed to support the terms of and be bound by the agreement contemplated by the Hartford Term Sheet.

PLEASE TAKE FURTHER NOTICE that attached to the Report as Exhibit B was the TCJC Term Sheet. Attached to the TCJC Term Sheet as Schedule 1 was a list of State Court Counsel that have each agreed to support the terms of and be bound by the agreement contemplated by the TCJC Term Sheet.

PLEASE TAKE FURTHER NOTICE that certain additional State Court Counsel have agreed to support the terms of and be bound by the agreements contemplated by the Hartford Term Sheet and TCJC Term Sheet, respectively.

PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit 1** is a revised Schedule 1 to the Hartford Term Sheet and attached hereto as **Exhibit 2** is a revised Schedule 1 to the TCJC Term Sheet.

PLEASE TAKE FURTHER NOTICE that, for the convenience of the Court and all parties in interest, attached hereto as **Exhibit 3** is a redline comparison of the revised Schedule 1 to the Hartford Term Sheet marked against the version attached to Exhibit A of the Report and attached hereto as **Exhibit 4** is a redline comparison of the revised Schedule 1 to the TCJC Term Sheet marked against the version attached to Exhibit B of the Report.

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 W. Walnut Hill Ln., Irving, TX 75038.

² Capitalized terms not defined herein are defined in the Report and its accompanying Exhibits.

Dated: September 20, 2021
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Paige N. Topper

Derek C. Abbott (No. 3376)
Andrew R. Remming (No. 5120)
Paige N. Topper (No. 6470)
1201 North Market Street, 16th Floor
P.O. Box 1347
Wilmington, Delaware 19899-1347
Telephone: (302) 658-9200
Email: dabbott@morrisnichols.com
aremming@morrisnichols.com
ptopper@morrisnichols.com

– and –

WHITE & CASE LLP

Jessica C. Lauria (admitted *pro hac vice*)
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 819-8200
Email: jessica.lauria@whitecase.com

– and –

WHITE & CASE LLP

Michael C. Andolina (admitted *pro hac vice*)
Matthew E. Linder (admitted *pro hac vice*)
Laura E. Baccash (admitted *pro hac vice*)
Blair M. Warner (admitted *pro hac vice*)
111 South Wacker Drive, Suite 5100
Chicago, Illinois 60606
Telephone: (312) 881-5400
Email: mandolina@whitecase.com
mlinder@whitecase.com
laura.baccash@whitecase.com
blair.warner@whitecase.com

**ATTORNEYS TO THE DEBTORS AND DEBTORS IN
POSSESSION**

EXHIBIT 1

Revised Schedule 1 to the Hartford Term Sheet

Schedule 1**State Court Counsel**

| FIRM | NOTICE ADDRESS | CLAIMS |
|---|--|---------------|
| Slater Slater Schulman LLP | Attn: Adam P. Slater (aslater@sssfirm.com) 488 Madison Avenue 20 th Floor New York, NY 10022 | 14170 |
| ASK LLP | Attn: Joseph Steinfeld (jsteinfeld@askllp.com) 2600 Eagan Woods Drive, Ste 400 Saint Paul, MN 55121 | 3277 |
| Andrews & Thornton, AAL, ALC | Andrews & Thornton Attn: Anne Andrews (aa@andrewsthornton.com) 4701 Von Karman Ave., Suite 300 Newport Beach, CA 92660 | 3009 |
| Eisenberg, Rothweiler, Winkler, Eisenberg & Jeck, P.C. | Attn: Stewart J. Eisenberg (stewart@erlegal.com) 1634 Spruce Street Philadelphia, PA 19103 | 16869 |
| Junell & Associates PLLC | Attn: Deborah Levy (dlevy@junell-law.com) 3737 Buffalo Speedway Ste. 1850 Houston, TX 77098 | 2918 |
| Reich & Binstock LLP | Attn: Dennis Reich (dreich@reichandbinstock.com) 4265 San Felipe St. #1000 Houston, TX 77027 | 336 |
| Krause & Kinsman Law Firm | Attn: Adam W. Krause (adam@krauseandkinsman.com) 4717 Grand Avenue #300 Kansas City, MO 64112 | 5981 |
| Bailey Cowan Heckaman PLLC | Attn: Aaron Heckaman (aheckaman@bchlaw.com) 5555 San Felipe St. Ste. 900 Houston, TX 77056 | 1026 |
| | | |

| FIRM | NOTICE ADDRESS | CLAIMS |
|--|--|---------------|
| Motley Rice LLC | Attn: Daniel Lapinski (dlapinski@motleyrice.com) 210 Lake Drive East Suite 101 Cherry Hill, NJ 08002 | 343 |
| Weller Green Toups & Terrell LLP | Attn: Mitchell Toups (matoups@wgttlaw.com) 2615 Calder Ave. #400 Beaumont, TX 77702 | 974 |
| Colter Legal PLLC | Attn: John Harnishfeger (john.harnishfeger@colterlegal.com) 1717 K St. NW Suite 900 Washington D.C. 20006 | 162 |
| Christina Pendleton & Associates, PLLC | Attn: Staesha Rath (sr@cpenlaw.com) 1506 Staples Mill Rd. Suite 101 Richmond, VA 23230 | 309 |
| Forman Law Offices, P.A. | Attn: Theodore Forman (ted@formanlawoffices.com) 238 NE 1 st Ave. Delray Beach, FL 33444 | 125 |
| Danziger & De Llano LLP | Attn: Rod de Llano (rod@dandell.com) 440 Louisiana St. Suite 1212 Houston, TX 77002 | 1707 |
| Swenson & Shelley | Attn: Kevin Swenson (kevin@swensonshelley.com) 107 South 1470 East, Ste. 201 St. George, UT 84790 | 175 |
| Cohen Hirsch LP (formerly Brooke F. Cohen Law, Hirsch Law Firm) | Attn: Brooke F. Cohen (brookefcohenlaw@gmail.com) Attn: Andrea Hirsch (andrea@thehirschlawfirm.com) 4318 Glenwick Lane Dallas, TX 75205 | 64 |
| Damon J. Baldone PLC | Attn: Damon J. Baldone (damon@baldonelaw.com) 162 New Orleans Blvd. Houma LA 70364 | 471 |

| FIRM | NOTICE ADDRESS | CLAIMS |
|--|---|---------------|
| Cutter Law, P.C. | Attn: Brooks Cutter (bcutter@cutterlaw.com) 4179 Piedmont Ave. 3rd Fl. Oakland, CA 94611 | 358 |
| Linville Johnson & Pahlke Law Group | Attn: Robert Pahlke (rgp@pahlkelawgroup.com) 2425 Circle Dr., Ste. 200 Scottsbluff NE 69361 | 71 |
| Porter & Malouf P.A. | Attn: Timothy Porter (tporter@portermalouf.com) (ssmith@portermalouf.com) (susan@portermalouf.com) 825 Ridgewood Rd. Ridgeland, MS 39157 | 86 |
| The Moody Law Firm | Attn: Will Moody Jr. (will@moodyrrlaw.com) 500 Crawford St., Ste. 200 Portsmouth, VA 23704 | 677 |
| Levin Papantonio Thomas Mitchell Rafferty & Procter P.A. | Attn: Cameron Stephenson (cstephenson@levinlaw.com) 316 South Baylen St. Pensacola, FL 32502 | 44 |
| Marc J Bern & Partners LLP | Attn: Joseph Cappelli (jcappelli@bernllp.com) 60 East 42 nd St. Ste. 950 New York, NY 10165 | 5893 |
| D. Miller and Associates, PLLC | Attn: Rochelle Guiton (bsa@dmillerlaw.com) 2610 W. Sam Houston Pkwy Ste. 200 Houston, TX 77042 | 3008 |
| Hilliard Martinez Gonzales LLP | Attn: Robert C. Hilliard and Rudy Gonzales, Jr. (hmgservice@hmglawfirm.com) 719 South Shoreline Blvd. Corpus Christi, TX 78411 | 289 |

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|-------------------------------|---|---------------|
| McDonald Worley, P.C. | Attn: Don Worley 1770 St. James Place, Ste. 100 Houston, TX 77056 | 140 |
| TorHoerman Law, LLC | Attn: Eric Terry (eric@thlawyer.com) 210 S. Main St. Edwardsville, IL 62025 | 125 |
| Gibbs Law Group | Attn: Karen Barth Menzies (kbn@classlawgroup.com) 505 14th St. Suite 1110 Oakland, CA 94612 | 179 |
| Paluch Law, LLC | Attn: Jessica Paluch Hoerman (Jess@simplyconvert.com) 210 S. Main St. Edwardsville, IL 62025 | 139 |
| Philadelphia Lawyers Group | Attn: Alan Zibelman 1500 JFK Blvd. Ste. 1020 Philadelphia, PA 15102 | 135 |
| Carlson Law Firm | Attn: Craig Carlson 100 E Central Texas Expy Killeen, TX 76541 | 191 |
| IPG Law Group | Attn: Chip Winneker 133 W Main St. Norristown, PA 19401 | 122 |
| Douglas & London, P.C. | Attn: Kristin Padden (kpadden@douglasandlondon.com) 59 Maiden Lane, 6th Floor New York, NY 10038 | 60 |
| The Webster Law Firm | Attn: Jason C. Webster (jwebster@thewebsterlawfirm.com) 6200 Savoy Suite 150 Houston, TX 77036 | 20 |
| Freese & Goss, PLLC | Attn: Peter de la Cerda (peter@freeseandgoss.com) 3500 Maple Ave., Ste. 1100 Dallas, TX 75219 | 458 |

| FIRM | NOTICE ADDRESS | CLAIMS |
|-------------------------------------|---|--------|
| Brent Coon & Associates | Attn: Brent Coon (Brent@bcoonlaw.com) 300 Fannin, Suite 200 Houston, TX 77002 | 69 |
| DiCello Levitt Gutzler | Attn : Adam J. Levitt (alevitt@dicellolevitt.com) Ten North Dearborn Street Sixth Floor Chicago, IL 60602 | 112 |
| Davis Bethune Jones | Attn: Grant Davis and Ted Ruzicka (gdavis@dbjlaw.net) (truzicka@dbjlaw.net) 1100 Main Street # 2930 Kansas City, MO 64105 | 1054 |
| Mary Alexander and Associates, P.C. | Attn: Mary Alexander, Esq. (malexander@maryalexanderlaw.com) 44 Montgomery Street, Ste. 1303 San Francisco, CA 94104 | 74 |

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EXHIBIT 2

Revised Schedule 1 to the TCJC Term Sheet

Schedule 1**State Court Counsel**

| FIRM | NOTICE ADDRESS | CLAIMS |
|---|--|---------------|
| Slater Slater Schulman LLP | Attn: Adam P. Slater (aslater@sssfirm.com) 488 Madison Avenue 20 th Floor New York, NY 10022 | 14170 |
| ASK LLP | Attn: Joseph Steinfeld (jsteinfeld@askllp.com) 2600 Eagan Woods Drive, Ste 400 Saint Paul, MN 55121 | 3277 |
| Andrews & Thornton, AAL, ALC | Andrews & Thornton Attn: Anne Andrews (aa@andrewsthornton.com) 4701 Von Karman Ave., Suite 300 Newport Beach, CA 92660 | 3009 |
| Eisenberg, Rothweiler, Winkler, Eisenberg & Jeck, P.C. | Attn: Stewart J. Eisenberg (stewart@erlegal.com) 1634 Spruce Street Philadelphia, PA 19103 | 16869 |
| Junell & Associates PLLC | Attn: Deborah Levy (dlevy@junell-law.com) 3737 Buffalo Speedway Ste. 1850 Houston, TX 77098 | 2918 |
| Reich & Binstock LLP | Attn: Dennis Reich (dreich@reichandbinstock.com) 4265 San Felipe St. #1000 Houston, TX 77027 | 336 |
| Krause & Kinsman Law Firm | Attn: Adam W. Krause (adam@krauseandkinsman.com) 4717 Grand Avenue #300 Kansas City, MO 64112 | 5981 |
| Bailey Cowan Heckaman PLLC | Attn: Aaron Heckaman (aheckaman@bchlaw.com) 5555 San Felipe St. Ste. 900 Houston, TX 77056 | 1026 |
| Jason J. Joy & Associates, PLLC | Attn: Jason Joy (jason@jasonjoylaw.com) 909 Texas St, Ste 1801 | 690 |

| FIRM | NOTICE ADDRESS | CLAIMS |
|--|--|--------|
| | Houston, TX 770022 | |
| Motley Rice LLC | Attn: Daniel Lapinski (dlapinski@motleyrice.com) 210 Lake Drive East Suite 101 Cherry Hill, NJ 08002 | 343 |
| Weller Green Toups & Terrell LLP | Attn: Mitchell Toups (matoups@wgttlaw.com) 2615 Calder Ave. #400 Beaumont, TX 77702 | 974 |
| Colter Legal PLLC | Attn: John Harnishfeger (john.harnishfeger@colterlegal.com) 1717 K St. NW Suite 900 Washington D.C. 20006 | 162 |
| Christina Pendleton & Associates, PLLC | Attn: Staesha Rath (sr@cpenlaw.com) 1506 Staples Mill Rd. Suite 101 Richmond, VA 23230 | 309 |
| Forman Law Offices, P.A. | Attn: Theodore Forman (ted@formanlawoffices.com) 238 NE 1 st Ave. Delray Beach, FL 33444 | 125 |
| Danziger & De Llano LLP | Attn: Rod de Llano (rod@dandell.com) 440 Louisiana St. Suite 1212 Houston, TX 77002 | 1707 |
| Swenson & Shelley | Attn: Kevin Swenson (kevin@swensonshelley.com) 107 South 1470 East, Ste. 201 St. George, UT 84790 | 175 |
| Cohen Hirsch LP (formerly Brooke F. Cohen Law, Hirsch Law Firm) | Attn: Brooke F. Cohen (brookefcohenlaw@gmail.com) Attn: Andrea Hirsch (andrea@thehirschlawfirm.com) 4318 Glenwick Lane Dallas, TX 75205 | 64 |
| Damon J. Baldone PLC | Attn: Damon J. Baldone (damon@baldonelaw.com) 162 New Orleans Blvd. | 471 |

| FIRM | NOTICE ADDRESS | CLAIMS |
|--|---|---------------|
| | Houma LA 70364 | |
| Cutter Law, P.C. | Attn: Brooks Cutter (bcutter@cutterlaw.com) 4179 Piedmont Ave. 3rd Fl. Oakland, CA 94611 | 358 |
| Linville Johnson & Pahlke Law Group | Attn: Robert Pahlke (rgp@pahlkelawgroup.com) 2425 Circle Dr., Ste. 200 Scottsbluff NE 69361 | 71 |
| Porter & Malouf P.A. | Attn: Timothy Porter (tporter@portermalouf.com) (ssmith@portermalouf.com) (susan@portermalouf.com) 825 Ridgewood Rd. Ridgeland, MS 39157 | 86 |
| The Moody Law Firm | Attn: Will Moody Jr. (will@moodyrrlaw.com) 500 Crawford St., Ste. 200 Portsmouth, VA 23704 | 677 |
| Levin Papantonio Thomas Mitchell Rafferty & Procter P.A. | Attn: Cameron Stephenson (cstephenson@levinlaw.com) 316 South Baylen St. Pensacola, FL 32502 | 44 |
| Marc J Bern & Partners LLP | Attn: Joseph Cappelli (jcappelli@bernlip.com) 60 East 42 nd St. Ste. 950 New York, NY 10165 | 5893 |
| D. Miller and Associates, PLLC | Attn: Rochelle Guiton (bsa@dmillerlaw.com) 2610 W. Sam Houston Pkwy Ste. 200 Houston, TX 77042 | 3008 |
| Hilliard Martinez Gonzales LLP | Attn: Robert C. Hilliard and Rudy Gonzales, Jr. (hmgservice@hmglawfirm.com) 719 South Shoreline Blvd. Corpus Christi, TX 78411 | 289 |

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| Gibbs Law Group | Attn: Karen Barth Menzies (kbn@classlawgroup.com) 505 14th St. Suite 1110 Oakland, CA 94612 | 179 |
| Paluch Law, LLC | Attn: Jessica Paluch Hoerman (Jess@simplyconvert.com) 210 S. Main St. Edwardsville, IL 62025 | 139 |
| Philadelphia Lawyers Group | Attn: Alan Zibelman 1500 JFK Blvd. Ste. 1020 Philadelphia, PA 15102 | 135 |
| Babin Law, LLC | Attn: Steven Babin (steven.babin@babinlaws.com) (gayle.vojtush@babinlaws.com) 22 E. Gay St., Ste. 200 Columbus, OH 43215 | 1012 |
| Carlson Law Firm | Attn: Craig Carlson 100 E Central Texas Expy Killeen, TX 76541 | 191 |
| IPG Law Group | Attn: Chip Winneker 133 W Main St. Norristown, PA 19401 | 122 |
| Douglas & London, P.C. | Attn: Kristin Padden (kpadden@douglasandlondon.com) 59 Maiden Lane, 6th Floor New York, NY 10038 | 60 |
| The Webster Law Firm | Attn: Jason C. Webster (jwebster@thewebsterlawfirm.com) | 20 |

| FIRM | NOTICE ADDRESS | CLAIMS |
|--|---|--------|
| | 6200 Savoy Suite 150 Houston, TX 77036 | |
| Freese & Goss, PLLC | Attn: Peter de la Cerda (peter@freeseandgoss.com) 3500 Maple Ave., Ste. 1100 Dallas, TX 75219 | 458 |
| Brent Coon & Associates | Attn: Brent Coon (Brent@bcoonlaw.com) 300 Fannin, Suite 200 Houston, TX 77002 | 69 |
| DiCello Levitt Gutzler | Attn : Adam J. Levitt (alevitt@dicellolevitt.com) Ten North Dearborn Street Sixth Floor Chicago, IL 60602 | 112 |
| Davis Bethune Jones | Attn: Grant Davis and Ted Ruzicka (gdavis@dbjlaw.net) (truzicka@dbjlaw.net) 1100 Main Street # 2930 Kansas City, MO 64105 | 1054 |
| Mary Alexander and Associates, P.C. | Attn: Mary Alexander, Esq. (malexander@maryalexanderlaw.com) 44 Montgomery Street, Ste. 1303 San Francisco, CA 94104 | 74 |

EXHIBIT 3

Redline Comparison of Revised Schedule 1 to the Hartford Term Sheet

Schedule 1**State Court Counsel**

| FIRM | NOTICE ADDRESS | CLAIMS |
|---|---|---------------|
| Slater Slater Schulman LLP | Attn: Adam P. Slater (aslater@sssfirm.com) 488 Madison Avenue 20 th Floor New York, NY 10022 | 14170 |
| ASK LLP | Attn: Joseph Steinfeld (jsteinfeld@askllp.com) 151 West 46th Street, 4th Floor New York, NY 10036 2600 Eagan Woods Drive, Ste 400 Saint Paul, MN 55121 | 3277 |
| Andrews & Thornton, AAL, ALC | Andrews & Thornton Attn: Anne Andrews (aa@andrewsthornton.com) 4701 Von Karman Ave., Suite 300 Newport Beach, CA 92660 | 3009 |
| Eisenberg, Rothweiler, Winkler, Eisenberg & Jeck, P.C. | Attn: Stewart J. Eisenberg (stewart@erlegal.com) 1634 Spruce Street Philadelphia, PA 19103 | 16869 |
| Junell & Associates PLLC | Attn: Deborah Levy (dlevy@junell-law.com) 3737 Buffalo Speedway Ste. 1850 Houston, TX 77098 | 2918 |
| Reich & Binstock LLP | Attn: Dennis Reich (dreich@reichandbinstock.com) 4265 San Felipe St. #1000 Houston, TX 77027 | 336 |
| Krause & Kinsman Law Firm | Attn: Adam W. Krause (adam@krauseandkinsman.com) 4717 Grand Avenue #300 Kansas City, MO 64112 | 5981 |
| Bailey Cowan Heckaman PLLC | Attn: Aaron Heckaman (aheckaman@bchlhw.com) 5555 San Felipe St. Ste. 900 Houston, TX 77056 | 1026 |

| FIRM | NOTICE ADDRESS | CLAIMS |
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| Jason J. Joy & Associates, PLLC | Attn: Jason Joy (jason@jasonjoylaw.com)- 909 Texas St, Ste 1801 Houston, TX 770022 | 690 |
| Motley Rice LLC | Attn: Daniel Lapinski (dlapinski@motleyrice.com) 210 Lake Drive East Suite 101 Cherry Hill, NJ 08002 | 343 |
| Weller Green Touns & Terrell LLP | Attn: Mitchell Touns (matouns@wgttlaw.com) 2615 Calder Ave. #400 Beaumont, TX 77702 | 974 |
| Colter Legal PLLC | Attn: John Harnishfeger (john.harnishfeger@colterlegal.com) 1717 K St. NW Suite 900 Washington D.C. 20006 | 162 |
| Christina Pendleton & Associates, PLLC | Attn: Staesha Rath (sr@cpenlaw.com) 1506 Staples Mill Rd. Suite 101 Richmond, VA 23230 | 309 |
| Forman Law Offices, P.A. | Attn: Theodore Forman (ted@formanlawoffices.com) 238 NE 1 st Ave. Delray Beach, FL 33444 | 125 |
| Danziger & De Llano LLP | Attn: Rod de Llano (rod@dandell.com) 440 Louisiana St. Suite 1212 Houston, TX 77002 | 1707 |
| Swenson & Shelley | Attn: Kevin Swenson (kevin@swensonshelley.com) 107 South 1470 East, Ste. 201 St. George, UT 84790 | 175 |
| Cohen Hirsch LP (formerly Brooke F. Cohen Law, Hirsch Law Firm) | Attn: Brooke F. Cohen (brookefcohenlaw@gmail.com) Attn: Andrea Hirsch (andrea@thehirschlawfirm.com) 4318 Glenwick Lane Dallas, TX 75205 | 64 |
| Damon J. Baldone | Attn: Damon J. Baldone | 471 |

| FIRM | NOTICE ADDRESS | CLAIMS |
|--|--|----------------------|
| PLC | (damon@baldonelaw.com) 162 New Orleans Blvd. Houma LA 70364 | |
| Cutter Law, P.C. | Attn: Brooks Cutter (bcutter@cutterlaw.com) 4179 Piedmont Ave. 3rd Fl. Oakland, CA 94611 | 358 |
| Linville Johnson & Pahlke Law Group | Attn: Robert Pahlke (rgp@pahlkelawgroup.com) 2425 Circle Dr., Ste. 200 Scottsbluff NE 69361 | 71 |
| Porter & Malouf P.A. | Attn: Timothy Porter (tporter@portermalouf.com) ssmith@portermalouf.com susan@portermalouf.com 825 Ridgewood Rd. Ridgeland, MS 39157 | 86 |
| The Moody Law Firm | Attn: Will Moody Jr. (will@moodyrrlaw.com) 500 Crawford St., Ste. 200 Portsmouth, VA 23704 | 677 |
| Levin Papantonio Thomas Mitchell Rafferty & Procter P.A. | Attn: Cameron Stephenson (cstephenson@levinlaw.com) 316 South Baylen St. Pensacola, FL 32502 | 44 |
| Marc J Bern & Partners LLP | Attn: Joseph Cappelli (jcappelli@bernlip.com) 60 East 42 nd St. Ste. 950 New York, NY 10165 | 5893 |
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| Hilliard Martinez Gonzales LLP | Attn: Robert C. Hilliard and Rudy Gonzales, Jr. hmgservice@hmglawfirm.com | 289 |

| FIRM | NOTICE ADDRESS | CLAIMS |
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| | 719 South Shoreline Blvd. Corpus Christi, TX 78411 | |
| McDonald Worley, P.C. | Attn: Don Worley 1770 St. James Place, Ste. 100 Houston, TX 77056 | 140 |
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| Paluch Law, LLC | Attn: Jessica Paluch Hoerman (Jess@simplyconvert.com) 210 S. Main St. Edwardsville, IL 62025 | 139 |
| Philadelphia Lawyers Group | Attn: Alan Zibelman 1500 JFK Blvd. Ste. 1020 Philadelphia, PA 15102 | 135 |
| Carlson Law Firm | Attn: Craig Carlson 100 E Central Texas Expy Killeen, TX 76541 | 191 |
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| Douglas & London, P.C. | Attn: Kristin Padden (kpadden@douglasandlondon.com) 59 Maiden Lane, 6th Floor New York, NY 10038 | 60 |
| The Webster Law Firm | Attn: Jason C. Webster (jwebster@thewebsterlawfirm.com) 6200 Savoy Suite 150 | 20 |

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| DiCello Levitt Gutzler | Attn : Adam J. Levitt (alevitt@dicellolevitt.com) Ten North Dearborn Street Sixth Floor Chicago, IL 60602 | 112 |
| Davis Bethune Jones | Attn: Grant Davis and Ted Ruzicka (gdavis@dbjlaw.net) (truzicka@dbjlaw.net) 1100 Main Street # 2930 Kansas City, MO 64105 | 1054 |
| Mary Alexander and Associates, P.C. | Attn: Mary Alexander, Esq. (malexander@maryalexanderlaw.com) 44 Montgomery Street, Ste. 1303 San Francisco, CA 94104 | 74 |

[64153897 v4-WorkSiteUS-036293/0001](#)

EXHIBIT 4

Redline Comparison of Revised Schedule 1 to the TCJC Term Sheet

Schedule 1**State Court Counsel**

| FIRM | NOTICE ADDRESS | CLAIMS |
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| ASK LLP | Attn: Joseph Steinfeld (jsteinfeld@askllp.com) 151 West 46th Street, 4th Floor New York, NY 10036 2600 Eagan Woods Drive, Ste 400 Saint Paul, MN 55121 | 3277 |
| Andrews & Thornton, AAL, ALC | Andrews & Thornton Attn: Anne Andrews (aa@andrewsthornton.com) 4701 Von Karman Ave., Suite 300 Newport Beach, CA 92660 | 3009 |
| Eisenberg, Rothweiler, Winkler, Eisenberg & Jeck, P.C. | Attn: Stewart J. Eisenberg (stewart@erlegal.com) 1634 Spruce Street Philadelphia, PA 19103 | 16869 |
| Junell & Associates PLLC | Attn: Deborah Levy (dlevy@junell-law.com) 3737 Buffalo Speedway Ste. 1850 Houston, TX 77098 | 2918 |
| Reich & Binstock LLP | Attn: Dennis Reich (dreich@reichandbinstock.com) 4265 San Felipe St. #1000 Houston, TX 77027 | 336 |
| Krause & Kinsman Law Firm | Attn: Adam W. Krause (adam@krauseandkinsman.com) 4717 Grand Avenue #300 Kansas City, MO 64112 | 5981 |
| Bailey Cowan Heckaman PLLC | Attn: Aaron Heckaman (aheckaman@bchlhw.com) 5555 San Felipe St. Ste. 900 Houston, TX 77056 | 1026 |

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| Motley Rice LLC | Attn: Daniel Lapinski (dlapinski@motleyrice.com) 210 Lake Drive East Suite 101 Cherry Hill, NJ 08002 | 343 |
| Weller Green Troups & Terrell LLP | Attn: Mitchell Troups (matroups@wgttlaw.com) 2615 Calder Ave. #400 Beaumont, TX 77702 | 974 |
| Colter Legal PLLC | Attn: John Harnishfeger (john.harnishfeger@colterlegal.com) 1717 K St. NW Suite 900 Washington D.C. 20006 | 162 |
| Christina Pendleton & Associates, PLLC | Attn: Staesha Rath (sr@cpenlaw.com) 1506 Staples Mill Rd. Suite 101 Richmond, VA 23230 | 309 |
| Forman Law Offices, P.A. | Attn: Theodore Forman (ted@formanlawoffices.com) 238 NE 1 st Ave. Delray Beach, FL 33444 | 125 |
| Danziger & De Llano LLP | Attn: Rod de Llano (rod@dandell.com) 440 Louisiana St. Suite 1212 Houston, TX 77002 | 1707 |
| Swenson & Shelley | Attn: Kevin Swenson (kevin@swensonshelley.com) 107 South 1470 East, Ste. 201 St. George, UT 84790 | 175 |
| Cohen Hirsch LP (formerly Brooke F. Cohen Law, Hirsch Law Firm) | Attn: Brooke F. Cohen (brookefcohenlaw@gmail.com) Attn: Andrea Hirsch (andrea@thehirschlawfirm.com) 4318 Glenwick Lane Dallas, TX 75205 | 64 |
| Damon J. Baldone | Attn: Damon J. Baldone | 471 |

| FIRM | NOTICE ADDRESS | CLAIMS |
|--|--|----------------------|
| PLC | (damon@baldonelaw.com) 162 New Orleans Blvd. Houma LA 70364 | |
| Cutter Law, P.C. | Attn: Brooks Cutter (bcutter@cutterlaw.com) 4179 Piedmont Ave. 3rd Fl. Oakland, CA 94611 | 358 |
| Linville Johnson & Pahlke Law Group | Attn: Robert Pahlke (rgp@pahlkelawgroup.com) 2425 Circle Dr., Ste. 200 Scottsbluff NE 69361 | 71 |
| Porter & Malouf P.A. | Attn: Timothy Porter (tporter@portermalouf.com) ssmith@portermalouf.com susan@portermalouf.com 825 Ridgewood Rd. Ridgeland, MS 39157 | 86 |
| The Moody Law Firm | Attn: Will Moody Jr. (will@moodyrrlaw.com) 500 Crawford St., Ste. 200 Portsmouth, VA 23704 | 677 |
| Levin Papantonio Thomas Mitchell Rafferty & Procter P.A. | Attn: Cameron Stephenson (cstephenson@levinlaw.com) 316 South Baylen St. Pensacola, FL 32502 | 44 |
| Marc J Bern & Partners LLP | Attn: Joseph Cappelli (jcappelli@bernllp.com) 60 East 42 nd St. Ste. 950 New York, NY 10165 | 5893 |
| D. Miller and Associates, PLLC | Attn: Rochelle Guiton bsa@dmillerlaw.com 2610 W. Sam Houston Pkwy Ste. 200 Houston, TX 77042 | 3008 |
| Hilliard Martinez Gonzales LLP | Attn: Robert C. Hilliard and Rudy Gonzales, Jr. hmgservice@hmglawfirm.com | 289 |

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| | <u>719 South Shoreline Blvd.</u> <u>Corpus Christi, TX 78411</u> | |
| <u>McDonald Worley,</u> <u>P.C.</u> | <u>Attn: Don Worley</u> <u>1770 St. James Place, Ste. 100</u> <u>Houston, TX 77056</u> | <u>140</u> |
| <u>TorHoerman Law,</u> <u>LLC</u> | <u>Attn: Eric Terry</u> <u>(eric@thlawyer.com)</u> <u>210 S. Main St.</u> <u>Edwardsville, IL 62025</u> | <u>125</u> |
| <u>Gibbs Law Group</u> | <u>Attn: Karen Barth Menzies</u> <u>(kbn@classlawgroup.com)</u> <u>505 14th St. Suite 1110</u> <u>Oakland, CA 94612</u> | <u>179</u> |
| <u>Paluch Law, LLC</u> | <u>Attn: Jessica Paluch Hoerman</u> <u>(Jess@simplyconvert.com)</u> <u>210 S. Main St.</u> <u>Edwardsville, IL 62025</u> | <u>139</u> |
| <u>Philadelphia</u> <u>Lawyers Group</u> | <u>Attn: Alan Zibelman</u> <u>1500 JFK Blvd. Ste. 1020</u> <u>Philadelphia, PA 15102</u> | <u>135</u> |
| <u>Babin Law, LLC</u> | <u>Attn: Steven Babin</u> <u>(steven.babin@babinlaws.com)</u> <u>(gayle.vojtush@babinlaws.com)</u> <u>22 E. Gay St., Ste. 200</u> <u>Columbus, OH 43215</u> | <u>1012</u> |
| <u>Carlson Law Firm</u> | <u>Attn: Craig Carlson</u> <u>100 E Central Texas Expy</u> <u>Killeen, TX 76541</u> | <u>191</u> |
| <u>IPG Law Group</u> | <u>Attn: Chip Winneker</u> <u>133 W Main St.</u> <u>Norristown, PA 19401</u> | <u>122</u> |
| <u>Douglas & London,</u> <u>P.C.</u> | <u>Attn: Kristin Padden</u> <u>(kpadden@douglasandlondon.com)</u> | <u>60</u> |

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| The Webster Law Firm | Attn: Jason C. Webster (jwebster@thewebsterlawfirm.com) 6200 Savoy Suite 150 Houston, TX 77036 | 20 |
| Freese & Goss, PLLC | Attn: Peter de la Cerda (peter@freeseandgoss.com) 3500 Maple Ave., Ste. 1100 Dallas, TX 75219 | 458 |
| Brent Coon & Associates | Attn: Brent Coon (Brent@bcoonlaw.com) 300 Fannin, Suite 200 Houston, TX 77002 | 69 |
| DiCello Levitt Gutzler | Attn : Adam J. Levitt (alevitt@dicellolevitt.com) Ten North Dearborn Street Sixth Floor Chicago, IL 60602 | 112 |
| Davis Bethune Jones | Attn: Grant Davis and Ted Ruzicka (gdavis@dbjlaw.net) (truzicka@dbjlaw.net) 1100 Main Street # 2930 Kansas City, MO 64105 | 1054 |
| Mary Alexander and Associates, P.C. | Attn: Mary Alexander, Esq. (malexander@maryalexanderlaw.com) 44 Montgomery Street, Ste. 1303 San Francisco, CA 94104 | 74 |