

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

In re:

BOY SCOUTS OF AMERICA AND  
DELAWARE BSA, LLC,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-10343 (LSS)

(Jointly Administered)

**FOURTH 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.<sup>2</sup> 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"), and a third

<sup>1</sup> 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.

<sup>2</sup> 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”) 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.<sup>3</sup>

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

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<sup>3</sup> 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.

5. White & Case conducted searches of its electronic client database for connections with the Potential Parties in Interest listed on the Third 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.<sup>4</sup> 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. None of the current or former clients listed on Schedule 2 represents more than 1% of White & Case's revenue for the twelve-month period from October 2020 through September 2021.

7. Further, on or about November 15, 2021, Ren-Ann Wang joined White & Case as an associate from her prior firm Eckert Seamans Cherin & Mellott, LLC. While an associate with her prior firm, Ms. Wang represented two Potential Parties in Interest, Rotary International ("Rotary") and the Upper New York Conference of the United Methodist Church ("UMC Upper New York Conference"), in connection with these chapter 11 cases. Rotary and the UMC Upper New York Conference are affiliated with certain Chartered Organizations that may be involved or become involved in these chapter 11 cases. Since joining White & Case, Ms. Wang has not

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<sup>4</sup> 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.

represented Rotary or the UMC Upper New York Conference. Additionally, Rotary and the UMC Upper New York Conference each provided written consent to White & Case that they would not seek to disqualify White & Case on the basis of Ms. Wang's hiring. As a condition of this consent, White & Case established a formal screening procedure or "ethical wall" to prevent Ms. Wang from accessing any of White & Case's files relating to the Debtors in these Chapter 11 Cases. Also, Ms. Wang has been advised that there should be no communications or exchanges of any information protected as confidential or as client secrets between, on the one hand, lawyers, paraprofessionals or legal assistants who have previously worked on, are currently working on, or are later assigned to work on, White & Case's representation of the Debtors in these Chapter 11 Cases and, on the other hand, Ms. Wang regarding her prior representation of Rotary and the UMC Upper New York Conference.

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, 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: December 6, 2021  
New York, New York

Respectfully submitted,

/s/ Jessica C. Lauria

Jessica C. Lauria

Partner

WHITE & CASE LLP

**Schedule 1**

**Third Supplemental Potential Parties in Interest List**

**Ordinary Course Professionals for Debtors**

535 Group  
Akerman LLP  
Barnes Lipscomb Stewart and Ott PLLC  
The BVA Group LLC

**Professional Representing the Other Parties**

Akin Gump

**Schedule 2**

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

<b>Category</b>	<b>Open Unrelated Client Matter(s)</b>	<b>Closed Unrelated Client Matter(s)</b>
Ordinary Course Professionals for Debtors		Akerman LLP