

**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)

**Objection Deadline: December 16, 2021, at 4:00
p.m. (prevailing Eastern Time)**

**SUMMARY COVER SHEET OF THE FIFTEENTH MONTHLY FEE APPLICATION
OF QUINN EMANUEL URQUHART & SULLIVAN, LLP FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
OCTOBER 1, 2021, TO AND INCLUDING OCTOBER 31, 2021**

| | |
|---|--|
| Name of Applicant: | Quinn Emanuel Urquhart & Sullivan, LLP |
| Authorized to Provide Professionals Services to: | Debtors and Debtors-in-Possession |
| Date of Retention: | August 1, 2020 (order entered September 18, 2020) |
| Period for Which Compensation and Reimbursement Are Requested: | October 1, 2021, through October 31, 2021 |
| Amount of Compensation Requested: | \$4,604.74 (80% of \$5,755.93) |
| Amount of Expense Reimbursement Requested: | \$6,230.00 |

This is a monthly fee statement.

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.

PRIOR MONTHLY FEE STATEMENTS FILED

| Date Filed; ECF No. | Period Covered | Fees Requested | Expenses Requested | Fees Approved | Expenses Approved | Outstanding Fees | Outstanding Expenses |
|---------------------------|------------------------|----------------|--------------------|---------------|-------------------|------------------|----------------------|
| 10/12/20; ECF No. 1486 | 08/01/2020-08/31/2020 | \$253,452.20 | \$6,261.04 | \$253,452.20 | \$6,261.04 | \$12,021.84 | \$0.00 |
| 11/10/20; ECF No. 1644 | 09/01/2020-09/30/2020 | \$587,436.16 | \$8,054.82 | \$587,436.16 | \$8,054.82 | \$44,794.13 | \$0.00 |
| 12/08/20; ECF No. 1809 | 10/01/2020-10/31/2020 | \$605,752.52 | \$9,975.55 | \$605,752.52 | \$9,975.55 | \$43,558.23 | \$0.00 |
| 01/14/21; ECF No. 1944 | 11/01/2020-11/30/2020 | \$690,108.20 | \$7,868.87 | \$690,108.20 | \$7,868.87 | \$68,440.93 | \$0.00 |
| 03/02/21; ECF No. 2307 | 12/01/2020-12/31/2020 | \$425,618.12 | \$32,405.35 | \$425,618.12 | \$32,405.35 | \$18,605.95 | \$0.00 |
| 03/09/21; ECF No. 2345 | 01/01/2021-01/31/2021 | \$834,988.70 | \$6,799.81 | \$834,988.70 | \$6,799.81 | \$471,515.36 | \$0.00 |
| 03/30/21; ECF No. 2480 | 02/01/2021-02/28/2021- | \$286,599.46 | \$13,902.71 | \$286,599.46 | \$13,902.71 | \$47,771.95 | \$0.00 |
| 04/28/21 ECF No. 2725 | 03/01/2021-03/31/2021 | \$193,900.48 | \$11,622.79 | \$193,900.48 | \$11,622.79 | \$38,780.10 | \$0.00 |
| 06/21/21 ECF No. 5393 | 04/01/2021-04/30/2021 | \$27,839.89 | \$6,230.00 | \$27,839.89 | \$6,230.00 | \$6,959.97 | \$0.00 |
| 08/03/21 ECF No. 5861 | 05/01/2021-05/31/2021 | \$12,573.68 | \$6,311.10 | \$12,573.68 | \$6,311.10 | \$3,143.42 | \$0.00 |
| 08/03/21 ECF No. 5862 | 06/01/2021-06/31/2021 | \$14,584.02 | \$6,230.00 | \$14,584.02 | \$6,230.00 | \$3,646.01 | \$0.00 |
| 09/29/21 ECF No. 6421 | 07/01/2021-07/30/2021 | \$185,776.56 | \$6,716.82 | \$185,776.56 | \$6,716.82 | \$46,444.14 | \$0.00 |
| 11/30/21 ECF No. 7505 | 08/01/2021-08/31/2021 | \$34,216.98 | \$6,230.00 | | | | |
| 11/30/21 ECF No. 7513 | 09/01/2021-09/30/2021 | \$125,531.18 | \$6,416.01 | | | | |

COMPENSATION AND HOURS BY PROFESSIONAL

| Name | Position | Year of Admission/Years of Experience | Discounted Hourly Rate | Total Hours | Total Compensation |
|--------------------------|-----------|---------------------------------------|------------------------|-------------|--------------------|
| Rachel Herrick Kassabian | Partner | 1997; 24 years | \$1,122.00 | 3.3 | \$3,702.60 |
| Todd Anten | Partner | 2007; 14 years | \$930.75 | 1.1 | \$1,023.83 |
| Barbara J. Howell | Paralegal | 36 years | \$355.00 | 2.9 | \$1,029.50 |

COMPENSATION BY PROJECT CATEGORY

| Task Description | Total Hours | Total Compensation |
|--|-------------|--------------------|
| Employment and Fee Applications | 3.4 | \$1,571.38 |
| Litigation – Federal District Court Case | 3.9 | \$4,184.55 |
| Total | 7.3 | \$5,755.93 |

EXPENSES BY CATEGORY

| Category | Amount |
|---|------------|
| Postage | |
| Filing fee | |
| Document Reproduction (at \$.10 per page) | |
| Color Document Reproduction (at \$.40 per page) | |
| Document Services | |
| Hosting per GB – 3.50 | \$6,230.00 |
| Total | \$6,230.00 |

**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)

**Objection Deadline: December 16, 2021, at 4:00 p.m.
(prevailing Eastern Time)**

**FIFTEENTH MONTHLY FEE APPLICATION
OF QUINN EMANUEL URQUHART & SULLIVAN, LLP FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES FOR THE PERIOD FROM OCTOBER 1, 2021,
TO AND INCLUDING OCTOBER 31, 2021**

COMES NOW, Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”), special litigation counsel for the Boy Scouts of America and Delaware BSA, LLC, the non-profit corporations that are debtors and debtors-in-possession (together, the “Debtors”) in the above-captioned chapter 11 cases, and hereby submits this fifteenth monthly fee application (this “Application”) for (a) interim allowance and payment of compensation for professional services to the Debtors during the period from October 1, 2021, to and including October 31, 2021 (the “Fee Period”), (a) in the amount of \$4,604.74, representing 80% of \$5,755.93 by Quinn Emanuel for professional services to the Debtors during the Fee Period and (b) reimbursement of 100% of the actual and necessary expenses incurred by Quinn Emanuel during the Fee Period in connection with such services in the amount of \$6,230.00. In support of this Application, Quinn Emanuel respectfully represents as follows:

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.

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction over this matter pursuant to 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. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory and other bases for the relief requested herein are sections 330 and 331 of chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and the *Order (I) Approving Procedures for (A) Interim Compensation and Reimbursement of Expenses of Retained Professionals and (B) Expense Reimbursement for Official Committee Members and (II) Granting Related Relief* (ECF No. 341) (the “Compensation Procedures Order”), and the *Order Amending the Order (I) Approving Procedures for (A) Interim Compensation and Reimbursement of Expenses of Retained Professionals and (B) Expense Reimbursement for Official Committee Members and (II) Granting Related Relief* (ECF No. 5899).

BACKGROUND

3. The Debtors commenced these cases on February 18, 2020 (the “Petition Date”), and they continue to operate their non-profit organization and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. These chapter 11 cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1.

4. On March 5, 2020, the United States Trustee for the District of Delaware appointed an official committee of tort claimants and an official committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code.

5. On April 24, 2020, the Court appointed James L. Patton, Jr. as the representative of future abuse claimants pursuant to sections 105(a) and 1109(b) of the Bankruptcy Code.

6. The Court has authorized the Debtors to retain and employ Quinn Emanuel as their special litigation counsel, *nunc pro tunc* to August 1, 2020, pursuant to the *Order Authorizing the Retention and Employment of Quinn Emanuel Urquhart & Sullivan, LLP as Special Litigation Counsel for the Debtors and Debtors in Possession, Nunc Pro Tunc to August 1, 2020* (ECF No. 1343) (the “Retention Order”). The Retention Order authorizes the Debtors to compensate and reimburse Quinn Emanuel in accordance with the terms and conditions as set forth in the Debtors’ application to retain Quinn Emanuel, subject to Quinn Emanuel’s application to the Court.

7. On April 6, 2020, the Court entered the Compensation Procedures Order. The Compensation Procedures Order provides, among other things, that each professional shall be entitled, on or as soon as practicable after the fifteenth (15th) day of each month following the month for which compensation and/or expense reimbursement is sought, to file and serve an application for interim allowance of compensation earned and reimbursement of expenses incurred during the preceding month (each a “Monthly Fee Application”). Parties shall have 14 days after service of a Monthly Fee Application to object thereto (the “Objection Deadline”). Upon the expiration of the Objection Deadline, the applicant may file a certificate of no objection (a “CNO”) with the Court with respect to the unopposed portion of the fees and/or expenses requested in the applicable Monthly Fee Application. After the filing of a CNO, the Debtors are authorized and

directed to pay the applicant an amount equal to 80% of the fees and 100% of the expenses requested in the applicable Monthly Fee Application not subject to an objection.

8. On September 18, 2020, the Court entered an order appointing Justin H. Rucki of Rucki Fee Review, LLC as the fee examiner in these chapter 11 cases.

RELIEF REQUESTED

9. By this Application, in accordance with the Compensation Procedures Order, Quinn Emanuel requests payment in the amount of \$4,604.74, which is equal to (a) 80% of the \$5,755.93 earned by Quinn Emanuel for professional services to the Debtors during the Fee Period and (b) 100% of the \$6,230.00 of actual and necessary expenses incurred by Quinn Emanuel during the Fee Period in connection with its services to the Debtors.

SUMMARY OF SERVICES RENDERED

10. Attached hereto as **Exhibit A** is a detailed statement of the time expended and compensation earned by Quinn Emanuel during the Fee Period. Quinn Emanuel's professionals expended a total of 7.3 hours in connection with these chapter 11 cases during the Fee Period. All services for which Quinn Emanuel is requesting compensation were performed for or on behalf of the Debtors. The services rendered by Quinn Emanuel during the Fee Period are categorized as set forth in **Exhibit A** and in the summary cover sheet prefixed to this Application. The professionals who provided services to the Debtors during the Fee Period are also identified in **Exhibit A** and in the summary cover sheets.

ACTUAL AND NECESSARY EXPENSES

11. Quinn Emanuel also incurred certain necessary expenses during the Fee Period for which it is entitled to reimbursement under the terms of its retention. Attached hereto as **Exhibit A** is a detailed statement of Quinn Emanuel's out-of-pocket expenses incurred during the Fee Period,

totaling \$6,230.00. These expenses include, but are not limited to, reprographics and document services and hosting services.

VALUATION OF SERVICES

12. As noted above, the amount of time spent by each Quinn Emanuel professional providing services to the Debtors during the Fee Period is set forth in the summary attached hereto as **Exhibit A**. The rates reflected on **Exhibit A** are Quinn Emanuel's customary hourly rates for work of this character. The reasonable value of the services rendered by Quinn Emanuel for the Fee Period as special litigation counsel to the Debtors in these chapter 11 cases is \$5,755.93.

13. In accordance with the factor enumerated in section 330 of the Bankruptcy Code, the fees requested are fair and reasonable given (a) the complexity of these chapter 11 cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

14. Although Quinn Emanuel has made every effort to include all fees and expenses incurred during the Fee Period in this Application, some fees and expenses might not be included in this Application due to delays caused by accounting and processing during the Fee Period. Quinn Emanuel reserves the right to make further applications to this Court for allowance of such fees and expenses not included herein. Subsequent fee applications will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Compensation Procedures Order.

CERTIFICATE OF COMPLIANCE

15. The undersigned has reviewed the requirements of Local Rule 2016-2 and certifies that, to the best of her knowledge, information, and belief, this Application complies with the requirements of that Local Rule.

WHEREFORE, Quinn Emanuel requests allowance and payment of compensation for professional services to the Debtors during the Fee Period in the amount of (a) \$4,604.74, representing 80% of the \$5,755.93 of fees earned by Quinn Emanuel for professional services to the Debtors during the Fee Period and (b) 100% of the actual and necessary expenses incurred by Quinn Emanuel during the Fee Period in connection with such services in the amount of \$6,230.00.

Respectfully submitted this 2nd day of December, 2021.

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ Patricia B. Tomasco

Patricia B. Tomasco
711 Louisiana, Suite 500
Houston, Texas 77002
Telephone: (713) 221-7000
Email: pattytomasco@quinnemanuel.com

– and –

Rachel Herrick Kassabian
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, California 94065
Telephone: (650) 801-5005
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– and –

Todd Anten
51 Madison Avenue, 22nd Floor
New York, New York 10010
Telephone: (212) 849-7192
Email: toddanten@quinnemanuel.com

SPECIAL LITIGATION COUNSEL FOR THE
DEBTORS AND DEBTORS IN POSSESSION

Exhibit A

Fees Statement and Expense Detail

quinn emanuel trial lawyers

865 S. Figueroa Street, 10th Floor
Los Angeles, California 90017

LOS ANGELES | NEW YORK | SAN FRANCISCO | SILICON VALLEY |
CHICAGO | DC | LONDON | MANNHEIM | TOKYO | HAMBURG |
PARIS | MUNICH | SYDNEY | HONG KONG | HOUSTON | BOSTON |
BRUSSELS | SEATTLE | ZURICH | SHANGHAI | STUTTGART | PERTH |
SALT LAKE CITY |

November 19, 2021

Steve P. McGowan, General Counsel
Legal Department
Boy Scouts of America
1325 W. Walnut Hill Lane
P.O. Box 152079
Irving, Texas 75015

Matter #: 05621-00003
Invoice Number: 101-0000126501
Responsible Attorney: Rachel Herrick Kassabian

Girl Scouts of the United States of America v. Boy Scouts of America

For Professional Services through October 31, 2021 in connection with defending Boy Scouts of America against Girls Scouts of the United States of America.

| | |
|------------------------|-------------------|
| Fees | \$5,755.93 |
| Expenses | <u>\$6,230.00</u> |
| Net Amount | \$11,985.93 |
| Total Due This Invoice | \$11,985.93 |

Confidential – May include attorney-client privileged and work-product information

quinn emanuel trial lawyers

November 19, 2021

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Matter #: 05621-00003

Invoice Number: 101-0000126501

Statement Detail**02 Employment and Fee Applications**

| | | | | |
|----------|-----|--|------|----------|
| 10/07/21 | BH2 | Prepare September Monthly Fee Statement as required by the Interim Compensation Order (1.8). | 1.80 | 639.00 |
| 10/11/21 | RHK | Email correspondence with G. Dermarkariants re invoices for submission in bankruptcy action. | 0.20 | 224.40 |
| 10/15/21 | BH2 | Prepare a Certificate of No Objection for submission to the bankruptcy court (.4); email correspondence with R. Kassabian, T. Anten, and P. Tomasco regarding same (.1). | 0.50 | 177.50 |
| 10/15/21 | RHK | Email correspondence with T. Anten re Certificate of No Objection. | 0.20 | 224.40 |
| 10/15/21 | TA | Review draft certificate of no objection for legal approval (0.1). | 0.10 | 93.08 |
| 10/18/21 | BH2 | Finalize the Certificate of No Objection for the July Fee Statement (.3) and submit the same pursuant to the Interim Compensation Order (.3). | 0.60 | 213.00 |
| | | SUBTOTAL | 3.40 | 1,571.38 |

03 Litigation - Federal District Court Case

| | | | | |
|----------|-----|--|------|--------|
| 10/04/21 | TA | Email correspondence [REDACTED] (0.2). | 0.20 | 186.15 |
| 10/05/21 | RHK | Conference call [REDACTED] [REDACTED] [REDACTED] (.3); email correspondence with T. Anten [REDACTED] (.2). | 0.50 | 561.00 |
| 10/06/21 | RHK | Analysis re [REDACTED] [REDACTED]. | 0.30 | 336.60 |
| 10/06/21 | TA | Research [REDACTED] [REDACTED] | 0.40 | 372.30 |



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Matter #: 05621-00003
Invoice Number: 101-0000126501

| | | | | |
|----------|-----|--|------|----------|
| | | ██████████ ██████████ (0.4). | | |
| 10/07/21 | TA | Email correspondence with R.Kassabian re ██████████ ██████████ (0.4). | 0.40 | 372.30 |
| 10/12/21 | RHK | Email correspondence ██████████ ██████████. | 0.10 | 112.20 |
| 10/18/21 | RHK | Analysis re ██████████ ██████████ (.6); email correspondence ██████████ (.5). | 1.10 | 1,234.20 |
| 10/22/21 | RHK | Email correspondence ██████████ ██████████. | 0.30 | 336.60 |
| 10/25/21 | RHK | Email correspondence ██████████ ██████████. | 0.30 | 336.60 |
| 10/29/21 | RHK | Review ██████████ (.1); email correspondence ██████████ ██████████ (.2). | 0.30 | 336.60 |
| | | SUBTOTAL | 3.90 | 4,184.55 |

quinn emanuel trial lawyers

November 19, 2021

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Matter #: 05621-00003

Invoice Number: 101-0000126501

Fee Summary

| Attorneys | Init. | Title | Hours | Rate | Amount |
|--------------------------|-------|-----------|-------|----------|----------|
| Rachel Herrick Kassabian | RHK | Partner | 3.30 | 1,122.00 | 3,702.60 |
| Todd Anten | TA | Partner | 1.10 | 930.75 | 1,023.83 |
| Case Assistants | Init. | Title | Hours | Rate | Amount |
| Barbara J Howell | BH2 | Paralegal | 2.90 | 355.00 | 1,029.50 |

Expense Summary

| Description | Amount |
|--|------------|
| <u>Litigation Support Costs</u> | |
| Hosting per GB - 3.50 | 6,230.00 |
| Total Expenses | \$6,230.00 |

**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)

**Objection Deadline: December 16, 2021, at 4:00 p.m.
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**NOTICE OF THE FIFTEENTH MONTHLY FEE APPLICATION
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ALLOWANCE OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES FOR THE PERIOD FROM OCTOBER 1, 2021,
TO AND INCLUDING OCTOBER 31, 2021**

PLEASE TAKE NOTICE that today, Quinn Emanuel Urquhart & Sullivan, LLP, as special counsel to the Debtors in the above-captioned case, filed the attached Fifteenth Monthly Fee Application of Quinn Emanuel Urquhart & Sullivan, LLP for Allowance of Compensation and Reimbursement of Expenses for the Period from October 1, 2021, to and including October 31, 2021 (the “Application”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Application, must: (a) be filed with the Clerk of the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, by December 16, 2021, at 4:00 p.m. (ET) (the “Objection Deadline”); and (b) be served so as to be received on or before the Objection Deadline by:

- a. The Debtors, Boy Scouts of America, 1325 West Walnut Hill Lane, Irving, Texas 75038, Attn: Steven P. McGowan (steve.mcgowan@scouting.org);
- b. Counsel to the Debtors – White & Case LLP, 1221 Avenue of the Americas, New York, New York 10020, Attn: Jessica C.K. Boelter (jessica.boelter@whitecase.com) and Matthew E. Linder (mlinder@whitecase.com);
- c. Co-counsel to the Debtors - Morris, Nichols, Arsht & Tunnell LLP, 1201 North Market Street, 16th Floor, P.O. Box 1347, Wilmington, Delaware 19899-1347, Attn: Derek C. Abbott (dabbott@mnat.com);

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.

- d. The United States Trustee - 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: David Buchbinder, Hannah M. McCollum, and Ramona Vinson (david.l.buchbinder@usdoj.gov; hannah.mccollum@usdoj.gov; ramona.vinson@usdoj.gov); Christine Green (Christine.Green@usdoj.gov);
- e. Counsel to the Official Committee of Unsecured Creditors - Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, New York 10036, Attn: Rachael Ringer and Megan M. Wasson (rringer@kramerlevin.com; mwasson@kramerlevin.com);
- f. Co-counsel to the Official Committee of Unsecured Creditors - Reed Smith LLP, 1201 N. Market Street, Suite 1500, Wilmington, DE 19801, Attn: Kurt F. Gwynne and Katelin A. Morales (kgwynne@reedsmith.com; kmorales@reedsmith.com);
- g. Counsel to the Official Committee of Tort Claimants - Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, Delaware 19801, Attn: James E. O'Neill and James I. Stang (joneill@pszjlaw.com; jstang@pszjlaw.com);
- h. Counsel to the Ad Hoc Committee of Local Councils - Wachtell, Lipton, Rosen & Katz, 51 West 52nd Street, New York New York 10019, Attn: Richard G. Mason and Joseph C. Celentino (rgmason@wlrk.com; jccelentino@wlrk.com);
- i. Counsel to JPMorgan Chase Bank, National Association - Norton Rose Fulbright US LLP, 2200 Ross Avenue, Dallas, Texas 75201-7932, Attn: Louis R. Strubeck and Kristian W. Gluck; (kristian.gluck@nortonrosefulbright.com; louis.strubeck@nortonrosefulbright.com);
- j. Counsel to the County Commission of Fayette County (West Virginia) - Steptoe & Johnson PLLC, Chase Tower, 8th Floor, 707 Virginia Street East, Charleston, West Virginia 25301, Attn: John Stump (john.stump@steptoe-johnson.com);
- k. Counsel to the Future Claimants' Representative - Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 N. King Street, Wilmington, Delaware 19801, Attn: Robert S. Brady and Edwin J. Harron (eharron@ycst.com; rbrady@ycst.com); and
- l. Rucki Fee Review, LLC, 1111 Windon Drive, Wilmington, DE 19803, Attn: Justin H. Rucki (justinrucki@ruckifeereview.com).

A HEARING ON THE APPLICATION, IF NECESSARY, WILL BE HELD AT THE CONVENIENCE OF THE COURT AND NOTICE OF ANY SUCH HEARING WILL BE GIVEN ONLY TO THE OBJECTING PARTY OR PARTIES.

IF YOU FILE TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE APPLICATION, WITHOUT FURTHER NOTICE OF HEARING.

Respectfully submitted this 2nd day of December, 2021.

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

By: /s/ Patricia B. Tomasco

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-and-

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-and-

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Telephone: 212-849-7192
Email: toddanten@quinnemanuel.com

SPECIAL LITIGATION COUNSEL FOR THE
BOY SCOUTS OF AMERICA AND DELAWARE
BSA, LLC