

**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

**THE ROMAN CATHOLIC AD HOC COMMITTEE'S NOTICE OF
DEPOSITION TO ERIC GREEN**

PLEASE TAKE NOTICE THAT pursuant to Fed. R. Civ. P. Rule 30(b)(6) and Fed. R. Bank. P. 7030 and 9014, The Roman Catholic Ad Hoc Committee shall take the deposition of Eric Green on the topics described in attached **Exhibit 1**.

The deposition will commence on **January 28, 2022 at 10:00 a.m. (Eastern Time)** and will proceed in person at the office of Schiff Hardin LLP, 233 S. Wacker Drive, Suite 7100, Chicago, IL 60606, remotely via video conference, or by such other means as may be agreed upon by counsel.

The deposition shall be taken upon oral examination before an officer authorized by law to administer oaths and shall be recorded by videographic and/or stenographic means.

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Dated: January 13, 2022
Wilmington, Delaware

POTTER ANDERSON & CORROON LLP

/s/ Jeremy W. Ryan

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*Counsel to the Roman Catholic Ad Hoc
Committee*

EXHIBIT 1

Definitions

1. Unless otherwise defined, capitalized terms shall have the meanings stated in the Second Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC [Docket No. 7832].

2. “Plan” shall mean the Second Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC [Docket. No. 7832] including all Exhibits, Appendices and any documents attached to the Plan Supplement [Docket No. 7515] or the Amended Plan Supplement [Docket No. 7953].

Deposition Topics

1. Any topic that has been noticed for your deposition or about which you are asked at your deposition by any other party.

2. The treatment of Claims of Chartered Organizations under the Plan and Trust Distribution Procedures.

3. The Century and Chubb Companies Insurance Settlement Agreement.

4. The Century and Chubb Companies Term Sheet.

5. Hartford Insurance Settlement Agreement.

6. Hartford Term Sheet.

7. The Zurich Settlement Term Sheet [Docket No. 7928].

8. The Zurich Insurance Settlement Agreement [Docket No. TBD].

9. Clarendon Term Sheet [Docket No. 8095].

10. Clarendon Insurance Settlement Agreement [Docket No. TBD].

11. Paragraphs 8, 9 and 11 of the Century Term Sheet.

12. BSA Insurance Policies.

13. Which Abuse Claims against insureds and co-insureds covered under insurance policies issued by any Settling Insurance Company will be channeled under the Settling Insurer Policy Injunction [Century Term Sheet] or the Channeling Injunction [Plan].

14. Which BSA Insurance Policies cover Abuse Claims against insureds and co-insureds.

15. The scope of the Channeling Injunction for claims against Participating Chartered Organizations, including:

- a. By year and by Local Council what Abuse Claims will be subject to the Channeling Injunction for Abuse Claims Arising prior to January 1, 1976;
and
- b. By year, what Abuse Claims will be subject to the Channeling Injunction for Abuse Claims that Arose on or after January 1, 1976.

CERTIFICATE OF SERVICE

I, Jeremy W. Ryan do hereby certify that on January 13, 2022, a copy of the foregoing **The Roman Catholic Ad Hoc Committee's Notice of Deposition to Eric Green** was served on the parties listed via email.

/s/ Jeremy W. Ryan

Jeremy Ryan (No. 4057)

CH2:25416323.1

In re Boy Scouts of America and Delaware BSA, LLC
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