

**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)

**AMENDED² NOTICE OF DISCOVERY CONFERENCE
SCHEDULED FOR AUGUST 30, 2021, AT 2:00 P.M. (ET)**

This remote discovery conference will be conducted entirely over Zoom and requires all participants to register in advance. Please register by August 30, 2021, at 11:00 a.m. Eastern Time

COURTCALL WILL NOT BE USED FOR THIS DISCOVERY CONFERENCE.

Please use the following link to register for this discovery conference:

<https://debuscourts.zoomgov.com/meeting/register/vJltf-6vpjgsH73q1kIzZ7liGObrBo--ht4>

After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the discovery conference.

Topic: Boy Scouts of America

Time: August 30, 2021, at 2:00 p.m. Eastern Time (US and Canada)

¹ The Debtors in the 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.

² **Amended items appear in bold.**

DISCOVERY CONFERENCE

1. Joint Letter to the Honorable Judge Laurie Silverstein from the Official Committee of Tort Claimants, the Coalition of Abused Scouts for Justice and the Future Claimants' Representative Regarding Discovery ([D.I. 6102](#), filed 8/20/21).

Responses Received:

- a) Letter to the Honorable Judge Laurie Silverstein Regarding Discovery and Responding to the Joint Letter from the Official Committee of Tort Claimants, the Coalition of Abused Scouts for Justice and the Future Claimants' Representative ([D.I. 6120](#), filed 8/25/21).

Status: Please take notice that at the direction of the Court a discovery conference will be held.

2. [SEALED] Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections (D.I. 1971, Filed 1/22/21).

Objection Deadline: February 5, 2021, at 4:00 p.m. (ET). Extended to February 15, 2021 at 4:00 p.m. (ET) for the Law Office of Carmen L. Durso.

Responses Received:

- a) [SEALED] Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections (D.I. 2046, Filed 2/5/21);
- b) [REDACTED] Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections [D.I. 1972] ([D.I. 2048](#), Filed 2/5/21);
- c) Statement of Interest Regarding Certain Discovery Motions ([D.I. 2049](#), Filed 2/5/21);
- d) Bailey Cowan Heckaman PLLC's Joinder in the Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections [D.I. 1972] ([D.I. 2054](#), Filed 2/5/21);
- e) Objection, Joinder and Reservation of Rights of James Harris Law, PLLC to the Objection of Various Law Firms to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2059](#), Filed 2/5/21);

- f) Joinder of Eisenberg, Rothweiler, Winkler, Eisenberg & Jeck, P.C. to the Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2061](#), Filed 2/5/21);
- g) Claimant No. 40573's Objection to Hartford and Century's Motion for Entry of an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2066](#), Filed 2/5/21);
- h) Joinder by Various Child Sexual Abuse Tort Claimants, to the Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections [D.I 1972] ([D.I. 2069](#), Filed 2/5/21);
- i) Joinder to the Coalition of Abused Scouts for Justice's Objection to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2077](#), Filed 2/5/21);
- j) Joinder by Claimant 55101 to the Coalition of Abused Scouts for Justice's Objection to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2079](#), Filed 2/5/21);
- k) Junell & Associates Joinder to the Objections of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections [D.I. 1972] ([D.I. 2081](#), Filed 2/5/21);
- l) Joinder by Timothy D. Kosnoff, Esquire to the Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2082](#), Filed 2/5/21);
- m) Objection of Schneider Wallace Cottrell Konecky, on behalf of Claimants 18867, 43995, and 50263, to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections [D.I. 1972] ([D.I. 2085](#), Filed 2/5/21);

- n) **PCVA Claimants' Objections to Hartford and Century's Request for Rule 2004 Examinations ([D.I. 2088](#), Filed 2/5/21);**
- o) **Joinder of Schneider Wallace Cottrell Konecky, on behalf of Claimants 18867, 43995, and 50263, in the Objection of Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objection ([D.I. 2089](#), Filed 2/5/21);**
- p) **Napoli Shkolnik PLLC's Opposition to Hartford and Century's Motions for (1) an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections and (2) Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2090](#), Filed 2/5/21);**
- q) **Crew Janci Claimants' Objection to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2092](#), Filed 2/5/21);**
- r) **[Corrected] Joinder by Timothy D. Kosnoff, Esquire to the Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2094](#), Filed 2/5/21);**
- s) **Corrected Objection of Steven C. Babin, Jr. and Babin Law, LLC to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claims [D.I. 1974] and Joinder to the Objection of the Coalition of Abused Scouts for Justice to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claims [DK 2046] ([D.I. 2098](#), Filed 2/5/21);**
- t) **Joinder by Claimant No. 5502 to PCVA Claimants' Objections to Hartford and Century's Request for Rule 2004 Examinations ([D.I. 2099](#), Filed 2/5/21);**
- u) **Joinder by Claimant Nos. 26704, 31245, 31384, 35542 and 41005 to PCVA Claimants' Objections to Hartford and Century's Request for 2004 Examinations ([D.I. 2100](#), Filed 2/5/21);**
- v) **Joinder of Marc J. Bern & Partners LLP to the Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections [D.I. 1972] ([D.I. 2101](#), Filed 2/5/21);**

- w) Merson Law Claimant's Joinder to PCVA Claimants' Objections to Hartford and Century's Request for Rule 2004 Examinations ([D.I. 2107](#), Filed 2/6/21);
- x) Porter & Malouf, P.A.'s Joinder in the Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections [D.I. 1972] ([D.I. 2108](#), Filed 2/6/21);
- y) Supplement to Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections [D.I. 1972] ([D.I. 2184](#), Filed 2/11/21); and
- z) Objection of John Doe No. 59969 to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2217](#), Filed 2/16/21).

Related Pleadings:

- a) [REDACTED] Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 1972](#), Filed 1/22/21);
- b) Joinder by Agricultural Insurance Company to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 1979](#), Filed 1/25/21);
- c) Notice of Filing Revised Proposed Redacted Version of Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2007](#), Filed 2/2/21);
- d) Joinder by Travelers Casualty and Surety Company, Inc. (FKA Aetna Casualty & Surety Company), St. Paul Surplus Line Insurance Company and Gulf Insurance Company to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2008](#), Filed 2/2/21);

- e) **[SEALED] Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections (D.I. 2009, Filed 2/2/21);**
- f) **The Allianz Insurers' Joinder to (A) Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections and (B) Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2026](#), Filed 2/3/21);**
- g) **Joinder by the Continental Insurance Company to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2065](#), Filed 2/5/21);**
- h) **AIG's Joinder to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2070](#), Filed 2/5/21);**
- i) **Joinder by General Star Indemnity Company to Hartford & Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2136](#), Filed 2/10/21);**
- j) **Joinder of Liberty Mutual Insurance Company to (A) Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections; and (B) Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2168](#), Filed 2/11/21);**
- k) **Reply in Support of Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave From Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2169](#), Filed 2/11/21);**
- l) **Notice of Withdrawal of the Crew Janci Claimants' Objection to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2205](#), Filed 2/16/21);**
- m) **Notice of Withdrawal of PCVA Claimants' Objections to Hartford and Century's Request for Rule 2004 Examinations ([D.I. 2212](#), Filed 2/16/21); and**

- n) Notice of Filing Revised Exhibit C to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2224](#), Filed 2/16/21).

Status: At the direction of the Court this matter is going forward.

- 3. [SEALED] Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claims (D.I. 1974, Filed 1/22/21).

Objection Deadline: February 5, 2021, at 4:00 p.m. (ET).

Responses Received:

- a) Objection of the Coalition of Abused Scouts for Justice to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim [D.I. 1974] ([D.I. 2043](#), Filed 2/5/21);
- b) Statement of Interest Regarding Certain Discovery Motions ([D.I. 2049](#), Filed 2/5/21);
- c) Objection of Bailey Cowan Heckaman PLLC to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim [D.I. 1974] ([D.I. 2053](#), Filed 2/5/21);
- d) Objection, Joinder and Reservation of Rights of James Harris Law, PLLC to the Objection of Various Law Firms to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2060](#), Filed 2/5/21);
- e) Joinder of Eisenberg, Rothweiler, Winkler, Eisenberg & Jeck, P.C. to the Objection of the Coalition of Abused Scouts for Justice to the Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2062](#), Filed 2/5/21);
- f) Joinder by Various Child Sexual Abuse Tort Claimants to the Objection of the Coalition of Abused Scouts for Justice to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim [D.I. 1974] ([D.I. 2074](#), Filed 2/5/21);
- g) Objection of Timothy D. Kosnoff, Esquire to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2076](#), Filed 2/5/21);

- h) Joinder of Krause and Kinsman to the Coalition of Abused Scouts for Justice Objection to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim [D.I. 1974] ([D.I. 2078](#), Filed 2/5/21);**
- i) Junell & Associates, PLLC's Joinder to the Objections of the Coalition of Abused Scouts for Justice to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim [D.I. 1974] ([D.I. 2084](#), Filed 2/5/21);**
- j) [SEALED] Objection of Andrews & Thornton, Attorneys at Law and Ask LLP to Insurers' Motion for an Order Authorizing Rule 2004 Discovery (D.I. 2086, Filed 2/5/21);**
- k) Joinder of Timothy D. Kosnoff, Esquire to the Objection of the Coalition of Abused Scouts for Justice to the Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2087](#), Filed 2/5/21);**
- l) Napoli Shkolnik PLLC's Opposition to Hartford and Century's Motions for (1) an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections and (2) Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2090](#), Filed 2/5/21);**
- m) Joinder of Slater Slater Schulman LLP to the Objection of the Coalition of Abused Scouts for Justice to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2091](#), Filed 2/5/21);**
- n) Joinder by D. Miller & Associates PLLC to the Objection of the Coalition of Abused Scouts for Justice to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2093](#), Filed 2/5/21);**
- o) [REDACTED] Objection of Andrews & Thornton, Attorneys at Law and Ask LLP to Insurers' Motion for an Order Authorizing Rule 2004 Discovery ([D.I. 2095](#), Filed 2/5/21);**
- p) Corrected Objection of Steven C. Babin, Jr. and Babin Law, LLC to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claims [D.I. 1974] and Joinder to the Objection of the Coalition of Abused Scouts for Justice to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claims [DK 2046] ([D.I. 2098](#), Filed 2/5/21);**
- q) Objection of Marc J. Bern & Partners LLP to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim [D.I. 1974] ([D.I. 2102](#), Filed 2/5/21);**

- r) Joinder by Andrus Wagstaff, PC to the Objection of the Coalition of Abused Scouts for Justice to the Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claims ([D.I. 2117](#), Filed 2/8/21);
- s) Motion of the Coalition of Abused Scouts for Justice to File Sur-Reply to Insurers' Reply Brief in Support of Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2196](#), Filed 2/15/21).

Related Pleadings:

- a) [REDACTED] Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 1975](#), Filed 1/22/21);
- b) Notice of Filing Revised Proposed Redacted Version of Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2022](#), Filed 2/3/21);
- c) The Allianz Insurers' Joinder to (A) Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections and (B) Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2026](#), Filed 2/3/21);
- d) AIG'S Joinder to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2114](#), Filed 2/8/21);
- e) Joinder of Liberty Mutual Insurance Company to (A) Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections; and (B) Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2168](#), Filed 2/11/21);
- f) [SEALED] Reply to Motion for 2004 Discovery (D.I. 2171, Filed 2/11/21);
- g) Declaration of Andrew Kirschenbaum in Support of Insurers' Reply Brief in Support of Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim [D.I. 1974, Revised Public Version D.I. 2022] ([D.I. 2173](#), Filed 2/11/21);
- h) Supplemental Declaration of Paul J. Hinton ([D.I. 2174](#), Filed 2/11/21);
- i) [SEALED] Declaration in Support of Erich J. Speckin (D.I. 2175, Filed 2/11/21);
- j) [SEALED] Declaration in Support of Charles Fox (D.I. 2177, Filed 2/11/21);

- k) **Insurers' Reply Brief in Support of Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim [D.I. 1974, Revised Public Version of D.I. 2022] ([D.I. 2180](#), Filed 2/11/21); and**
- l) **Timothy D. Kosnoff, Esquire's Motion to Strike Insurers' Reply Brief in Support of Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim [D.I. 2180] ([D.I. 2204](#), Filed 2/16/21).**

Status: At the request of the Court this matter is going forward.

Dated: August 27, 2021
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Paige N. Topper

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– and –

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