

**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
AMERICAN ZURICH INSURANCE COMPANY, AMERICAN GUARANTEE AND
LIABILITY INSURANCE COMPANY, AND STEADFAST INSURANCE COMPANY**

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 American Zurich Insurance Company, American Guarantee and Liability Insurance Company, and Steadfast Insurance Company on the topics described in attached **Exhibit 1**.

The deposition will commence on **January 26, 2022 at 1:00 p.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

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/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. 7517] 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 Zurich Insurance Settlement Agreement.

4. The Zurich Term Sheet.

5. Paragraphs 5, 6 and 7 of the Zurich Term Sheet.

6. All BSA Insurance Policies issued by Zurich.

7. All Local Council Insurance Policies issued by Zurich.

8. All policies of insurance issued to Roman Catholic Entities.

9. Which Abuse Claims against insureds and co-insureds covered under insurance policies issued by any Settling Insurer [as defined in the Zurich Term Sheet] will be channeled

under the Settling Insurer Policy Injunction [as defined in the Century Term Sheet] or the Channeling Injunction [as defined in the Plan.]

10. Which BSA Insurance Policies issued by any Settling Insurer [Zurich Term Sheet] cover Abuse Claims against insureds and co-insureds.

11. Which Local Council Insurance Policies issued by any Settling Insurer [Zurich Term Sheet] cover Abuse Claims against insureds and co-insureds.

12. Which policies of insurance issued by any Settling Insurer [Zurich Term Sheet] to any Roman Catholic Entity cover Abuse Claims against insureds and co-insureds.

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

- a. With respect to Local Council Insurance Policies issued by any Settling Insurer [Zurich Term Sheet], 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. With respect to BSA Insurance Policies issued by any Settling Insurer [Zurich Term Sheet], 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 American Zurich Insurance Company, American Guarantee and Liability Insurance Company, and Steadfast Insurance Company** 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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