

**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)

**NOTICE OF SECOND AMENDED<sup>2</sup> AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON DECEMBER 2, 2021, AT 10:00 A.M. (ET)**

**This remote hearing will be conducted entirely over Zoom and requires all participants to register in advance. Please register by December 2, 2021, at 8:00 a.m. Eastern Time.**

**COURTCALL WILL NOT BE USED FOR THIS HEARING.**

**Please use the following link to register for this hearing:**

[https://debuscourts.zoomgov.com/meeting/register/vJItc-ugqTsrHG\\_WwAevSOG-JEcvvC0iqKU](https://debuscourts.zoomgov.com/meeting/register/vJItc-ugqTsrHG_WwAevSOG-JEcvvC0iqKU)

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

Topic: Boy Scouts of America

**Time: December 2, 2021, at 10:00 a.m. Eastern Time (US and Canada)**

**MATTERS GOING FORWARD**

1. Motion of Marc J. Bern & Partners LLC to Quash Subpoena to Produce Documents Issued to KLS Legal Solutions LLC ([D.I. 6380](#), filed 9/27/21).

Objection Deadline: None.

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<sup>1</sup> 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.

<sup>2</sup> **Amended items appear in bold.**

Responses Received:

- a) Century's Objection to Marc J. Bern & Partners' Motion to Quash Subpoena to Produce Documents Issued to KLS Legal Solutions, LLC ([D.I. 6598](#), filed 10/12/21);
- b) Notice of Joinder of Andrews & Thornton, Attorneys at Law, and ASK LLP to Docket Nos. 6380, 6873, and 6945 ([D.I. 6956](#), filed 11/03/21); and
- c) Zurich Insurers' Joinder to Century's Objection to Marc J. Bern & Partners' Motion to Quash Subpoena to Produce Documents Issued to KLS Legal Solutions, LLC ([D.I. 7158](#), filed 11/11/21).

Related Pleadings:

- a) Letter from William D. Sullivan, Esq. to the Honorable Chief Judge Laurie Selber Silverstein regarding Marc J. Bern & Partners, LLC Motion to Quash ([D.I. 6651](#), filed 10/18/21); and
- b) Reply in Support of Motion of Marc J. Bern & Partners LLC to Quash Subpoena to Produce Documents Issued to KLS Legal Solutions, LLC ([D.I. 6873](#), filed 10/29/21).

Status: The Debtors have been informed that counsel to Marc J. Bern & Partners and Century have agreed to adjourn this matter to the hearing scheduled for December 6, 2021.

- 2. Letter to the Honorable Chief Judge Laurie Selber Silverstein from Tancred Schiavoni Seeking an Order Compelling Baltimore Area Council to Comply with a Subpoena ([D.I. 7261](#), filed 11/16/21).

Objection Deadline: November 19, 2021.

Responses Received:

- a) Letter to the Honorable Chief Judge Laurie Selber Silverstein from Todd M. Brooks Regarding Baltimore Area Council's Response to Century's Letter Motion to Compel ([D.I. 7351](#), filed 11/19/21).

Related Pleadings:

- a) Declaration of Samantha Indelicato in Support of Century's Motion to Compel Baltimore Area Council ([D.I. 7262](#), filed 11/16/21);
- b) Letter to the Honorable Chief Judge Laurie Selber Silverstein from Tancred Schiavoni in Reply Further Supporting an Order Compelling Baltimore Area Council to Comply with a Subpoena ([D.I. 7407](#), filed 11/23/21); and

- c) Supplemental Declaration of Todd M. Brooks in Further Support of the Baltimore Area Council's Opposition to Century Indemnity Company's Letter-Motion to Compel a Third Production of Documents ([D.I. 7469](#), filed 11/29/21).

Status: This matter is going forward.

- 3. Letter to the Honorable Chief Judge Laurie Selber Silverstein from Tancred Schiavoni Seeking an Order Compelling Cradle of Liberty Council to Comply with a Subpoena ([D.I. 7263](#), filed 11/17/21).

Objection Deadline: November 22, 2021.

Responses Received:

- a) Letter to the Honorable Chief Judge Laurie Selber Silverstein from Jeffrey A. Lutsky Regarding Response of Cradle of Liberty Council to Century's Letter Motion to Compel ([D.I. 7383](#), filed 11/20/21).

Related Pleadings:

- a) Declaration of Samantha Indelicato in Support of Century's Motion to Compel Cradle of Liberty Council ([D.I. 7264](#), filed 11/16/21);
- b) Letter to the Honorable Chief Judge Laurie Selber Silverstein from Tancred Schiavoni in Reply Further Supporting an Order Compelling Cradle of Liberty Council to Comply with a Subpoena ([D.I. 7408](#), filed 11/23/21); and
- c) Letter of Cradle of Liberty Council in Further Support of Opposition to Century's Motion to Compel ([D.I. 7468](#), filed 11/29/21).

Status: This matter is going forward.

- 4. Letter to the Honorable Chief Judge Laurie Selber Silverstein from Tancred Schiavoni Moving to Compel the Compliance of the National Capital Area Council with Century's Subpoena ([D.I. 7384](#), filed 11/21/21).

Objection Deadline: November 24, 2021.

Responses Received:

- a) Letter to the Honorable Chief Judge Laurie Selber Silverstein regarding Century Indemnity Company's Letter to compel the National Capital Area Council ([D.I. 7446](#), filed 11/24/21).

Related Pleadings:

- a) Declaration of Samantha Indelicato in Support of Century's Motion to Compel National Capital Area Council ([D.I. 7385](#), filed 11/21/21);

- b) **Letter to the Honorable Chief Judge Laurie Selber Silverstein from Tancred Schiavoni in Reply and Further Support of Century's Motion to Compel the Compliance of the National Capital Area Council with Century's Subpoena (D.I. 7535, filed 12/1/21).**

Status: This matter is going forward.

5. Letter to the Honorable Chief Judge Laurie Selber Silverstein from Justin R. Alberto Regarding Motion to Quash the Deposition Subpoenas Served on Slater Slater Schulman LLP (D.I. 7465, filed 11/26/21).

Objection Deadline: November 29, 2021.

Responses Received:

- a) Letter to the Honorable Chief Judge Laurie Selber Silverstein from Kelly T. Currie Regarding Zurich Insurers' Response to Motion to Quash Subpoenas Served on Slater Slater Schulman and Eisenberg Rothweiler Winkler Eisenberg & Jeck, P.C. (D.I. 7495, filed 11/29/21).

Related Pleadings:

- a) Joinder of Andrews & Thornton, Attorneys at Law, and ASK LLP to Docket Nos. 7465 and 7466 (D.I. 7524, filed 12/1/21).

Status: This matter is going forward.

6. Letter to the Honorable Chief Judge Laurie Selber Silverstein from Daniel K. Hogan Regarding Motion to Quash Deposition Subpoenas Served on Eisenberg, Rothweiler, Winkler, Eisenberg and Jeck, P.C. (D.I. 7466, filed 11/26/21).

Objection Deadline: November 29, 2021.

Responses Received:

- a) Letter to the Honorable Chief Judge Laurie Selber Silverstein from Kelly T. Currie Regarding Zurich Insurers' Response to Motion to Quash Subpoenas Served on Slater Slater Schulman and Eisenberg Rothweiler Winkler Eisenberg & Jeck, P.C. (D.I. 7495, filed 11/29/21).

Related Pleadings:

- a) Joinder of Andrews & Thornton, Attorneys at Law, and ASK LLP to Docket Nos. 7465 and 7466 (D.I. 7524, filed 12/1/21).

Status: This matter is going forward.

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Dated: December 2, 2021  
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

/s/ Paige N. Topper

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**ATTORNEYS FOR THE DEBTORS AND  
DEBTORS IN POSSESSION**