



**HOGAN ♦ MCDANIEL**  
**ATTORNEYS AT LAW**

Daniel K. Hogan, Esquire  
Telephone (302) 656-7540  
Facsimile (302) 656-7599  
Email: dkhogan@dkhogan.com

1311 Delaware Avenue  
Wilmington, Delaware 19806

November 22, 2021

**VIA CM/ECF**

Chief Judge Laurie Selber Silverstein  
United States Bankruptcy Court, District of Delaware  
824 North Market Street, 6th Floor  
Wilmington, DE 19801

**RE: *In re Boy Scouts of America*, No. 20-10343  
Kosnoff Deposition scheduled for 12:30 p.m. November 22, 2021**

Dear Judge Silverstein:

I represent Eisenberg Rothweiler Winkler Eisenberg & Jeck P.C. (“Eisenberg Rothweiler”) in connection with the *Debtors’ Emergency Motion for Entry of an Order (I) Enforcing the Solicitation Procedures Order, (II) Enforcing Section 1103 of the Bankruptcy Code Against the Tort Claimants’ Committee, and (III) Granting Related Relief* [Dkt. No. 7118] (the “Motion”), to which ER joined [Dkt. No. 7252].

In connection with the Motion and with Century’s Motion to Compel Timothy Kosnoff [Dkt. No. 7149], the deposition upon oral examination of Timothy Kosnoff is scheduled for today, November 22, 2021, at 12:30 p.m.

Saturday morning, Mr. Kosnoff, through his counsel, David Wilks, produced discovery materials in response to Century’s Motion to Compel. The production of documents contains communications between Abused in Scouting (“AIS”) clients and Kosnoff Law that implicate the attorney-client privilege as well as the common interest privilege and the work product doctrine protections of Eisenberg Rothweiler. The Court will recall that AIS is comprised of three law firms, including Eisenberg Rothweiler, AVA Law and Kosnoff Law. Accordingly, I have emailed each of the recipients of the production and requested that they refrain from reviewing the production, and sequester the documents pending resolution.

Should Your Honor have any questions, I am available at the convenience of the Court.

Respectfully submitted,

/s/ Daniel K. Hogan  
Daniel K. Hogan, Esq. (#2814)

cc: All counsel of record (via CM/ECF)