

**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)

**CERTIFICATION OF COUNSEL REGARDING REVISED ORDER  
(I) AMENDING AND SCHEDULING CERTAIN SUPPLEMENTAL DATES  
AND DEADLINES IN CONNECTION WITH CONFIRMATION OF THE  
DEBTORS' PLAN OF REORGANIZATION AND (II) APPROVING A  
LIMITED SUPPLEMENTAL VOTING DEADLINE FOR CLASS 8 DIRECT  
ABUSE CLAIMS AND CLASS 9 INDIRECT ABUSE CLAIMS**

The undersigned counsel to the above-captioned debtors and debtors in possession (the "Debtors") hereby certifies as follows:

1. At the hearing held before the Court on February 18, 2022 (the "Hearing"), this Court further revised certain dates and deadlines in connection with confirmation of the Debtors' plan of reorganization.
2. Attached hereto as **Exhibit A** is a proposed form of Order (the "Proposed Order") that revises the dates and deadlines as discussed on the record at the Hearing and among the Participating Parties following the Hearing.<sup>2</sup>
3. On February 22, 2022, the Debtors sent the Proposed Order to the

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<sup>1</sup> The Debtors in the chapter 11 cases, together with the last four digits of each Debtors' federal tax identification number, are as follows: Boy Scouts of America (6300) and Delaware BSA, LLC (4311). The Debtors' mailing address is 1325 W. Walnut Hill Ln., Irving, TX 75038.

<sup>2</sup> Capitalized terms not defined herein are defined in the *Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization, (II) Establishing Certain Protocols, and (III) Granting Related Relief* [D.I. 6528] or the *Court's Order (I) Amending and Scheduling Certain Supplemental Dates and Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization and (II) Approving a Limited Supplemental Voting Deadline for Class 8 Direct Abuse Claims and Class 9 Indirect Abuse Claims* [D.I. 8830].

Participating Parties. The Debtors received comments on the Proposed Order from the Roman Catholic Ad Hoc Committee (the “RCAHC”) and the Certain Insurers. The Debtors believe that the Proposed Order reflects the comments received from the RCAHC and the Certain Insurers.

4. The Debtors circulated the Proposed Order to the Participating Parties on March 1, 2022. The Debtors received comments from the Certain Insurers and the Ad Hoc Committee of Local Councils and incorporated the comments into the Proposed Order.

*[Remainder of page intentionally left blank]*

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order attached hereto as **Exhibit A** at its earliest convenience.

Dated: March 1, 2022  
Wilmington, Delaware

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

/s/ Tori L. Remington

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ATTORNEYS FOR THE DEBTORS AND  
DEBTORS IN POSSESSION

**Exhibit A**

**Proposed Order**

**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)

Ref. D.I. 6438, 6528, 7996, 8830

**REVISED ORDER (I) AMENDING AND SCHEDULING CERTAIN  
SUPPLEMENTAL DATES AND DEADLINES IN CONNECTION  
WITH CONFIRMATION OF THE DEBTORS' PLAN OF  
REORGANIZATION AND (II) APPROVING A LIMITED  
SUPPLEMENTAL VOTING DEADLINE FOR CLASS 8 DIRECT  
ABUSE CLAIMS AND CLASS 9 INDIRECT ABUSE CLAIMS**

Upon the *Certification of Counsel Regarding the Order (I) Amending and Scheduling Certain Supplemental Dates and Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization and (II) Approving a Limited Supplemental Voting Deadline for Class 8 Direct Abuse Claims and Class 9 Indirect Abuse Claims* of Boy Scouts of America (the "BSA") and Delaware BSA, LLC, the non-profit corporations that are debtors and debtors in possession in the above-captioned chapter 11 cases (together, the "Debtors"), for entry of an order scheduling certain supplemental dates and deadlines in connection with confirmation of the Plan and all related discovery; and this Court's *Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization, (II) Establishing Certain Protocols, and (III) Granting Related Relief* [D.I. 6528]; and this Court's *Order Granting Certain Insurers' Motion to Modify the Confirmation Scheduling Order* [D.I. 7996]; and this Court's *Order (I) Amending and Scheduling Certain Supplemental Dates and Deadlines in Connection with*

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<sup>1</sup> The Debtors in these 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.

*Confirmation of the Debtors' Plan of Reorganization and (II) Approving a Limited Supplemental Voting Deadline for Class 8 Direct Abuse Claims and Class 9 Indirect Abuse Claims* [D.I. 8830] (together, the "Prior Confirmation Scheduling Orders");<sup>2</sup> and this Court's rulings and remarks at the hearing held before the Court on February 11 and February 18, 2022; and the Court having jurisdiction pursuant to 28 U.S.C. § 1334(b), and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and consideration of the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice having been provided, and it appearing that no other or further notice need be provided; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT**

1. The dates and deadlines in connection with confirmation of the Debtors' Plan are hereby approved as follows:

<b>Event</b>	<b>Prior Date</b>	<b>New Date<sup>3</sup></b>
Confirmation Brief / Plan Reply Deadline	February 14, 2022	March 2, 2022
Deadline to Object to FCR/Coalition Motion to Strike [D.I. 8771]	N/A	<b>March 2, 2022</b>
Deadline to Submit Witness and Exhibit Lists	January 20, 2022	<b>March 7, 2022</b>
Supplemental Chartered Organization Opt Out Deadline	February 25, 2022	<b>March 7, 2022</b>

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Prior Confirmation Scheduling Orders or the *Third Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC* [D.I. 8813] (the "Plan").

<sup>3</sup> Dates that have been revised in accordance with the Court's remarks at the status conference held on February 18, 2022 in addition to further discussions among the parties appear in bold below.

Deadline to Submit Pre-Trial Stipulations	January 20, 2022	<b>March 7, 2022 at 12:00 p.m. (Eastern Time)</b>
Limited Extended Voting Deadline	March 4, 2022 at 4:00 p.m. (Eastern Time)	<b>March 7, 2022 at 4:00 p.m. (Eastern Time)</b>
Final Pre-Trial Conference	March 8, 2022 at 10:00 a.m. (Eastern Time), <i>subject to the Court's availability</i>	March 8, 2022 at 10:00 a.m. (Eastern Time)
Hearing on FCR/Coalition Motion to Strike [D.I. 8771]	N/A	March 8, 2022 at 10:00 a.m. (Eastern Time), <i>subject to the Court's availability</i>
Revised Final Voting Report Submission Date	March 7, 2022	<b>March 10, 2022</b>
Deadline for Parties to File Witness Declarations with Respect to Confirmation	N/A	<b>72 hours prior to first day of subject witness's testimony at Confirmation Hearing</b>
Deadline for Parties to Object to Witness Declarations with Respect to Confirmation	N/A	<b>24 hours prior to first day of subject witness's testimony at Confirmation Hearing</b>
Confirmation Hearing	March 9, 2022 at 10:00 a.m. (Eastern Time)	<b>March 14, 2022 at 10:00 a.m. (Eastern Time)</b>

2. The Limited Extended Voting Deadline of **March 7, 2022 at 4:00 p.m. (Eastern Time)** shall be limited to (a) representatives or holders of Class 8 Direct Abuse Claims and (b) representatives or holders of Class 9 Indirect Abuse Claims to submit votes in connection with the Plan filed on February 15, 2022.

3. This Order only modifies the Prior Confirmation Scheduling Orders and the *Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief* [D.I. 6438] (the "**Solicitation Procedures Order**") as expressly provided herein. The other terms of the Prior Confirmation Scheduling Orders and the Solicitation Procedures Order,

including without limitation the Solicitation Procedures attached as Exhibit 1 to the Solicitation Procedures Order, otherwise control.

4. All time periods set forth in this order shall be calculated in accordance with Bankruptcy Rule 9006(a).

5. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

6. Nothing in this Order, nor the entry thereof, shall be construed as a finding or conclusion of the Court that the revised deadlines set forth in this Order and notices contemplated by or issued pursuant to this Order satisfy the Debtors' obligations under , *inter alia*, sections 1125 and 1127 of the Bankruptcy Code and Bankruptcy Rule 2002. All parties reserve their rights to argue compliance, or lack thereof, at the Confirmation Hearing.

7. The Debtors are authorized to take all action necessary to effectuate the relief granted in this Order.

8. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.