



in their chapter 11 cases. *See* Lead Case No. 20-10343 (LSS), Bankr. Dkt. 68. I respectfully submit this Declaration in support of the Motion to Dismiss.

2. Except as otherwise stated in this Declaration, all facts set forth herein are based on my personal knowledge and experience, knowledge that I acquired from individuals under my supervision, materials provided by, or my discussions with, members of the Debtors' management team and with Kinsella Media, LLC ("Kinsella"), or information obtained from my personal review of relevant documents. I am authorized to submit this Declaration on behalf of Omni Agent Solutions. If called upon to testify, I would competently testify to the facts set forth herein.

3. As of the date hereof, Omni Agent Solutions has sent the abuse claims bar date notice and the abuse survivor Claim Form to thousands of potential known sexual abuse claimants by first class mail. As further required by the Bar Date Order, BSA has emailed the court-approved notice and Claim Form to approximately six million parties, including current and former Scouts, volunteers, and parents, and email notices will be sent to at least three million additional parties by June 27, 2020.

4. Kinsella Media, LLC ("Kinsella") was retained directly by and has acted exclusively for Omni Agent Solutions to design and implement the Supplemental Notice Plan and other related noticing tasks in the BSA's chapter 11 cases. I understand that Kinsella is in the process of producing print, television, and radio advertisements as part of the Supplemental Notice Plan, all of which are well underway as of the date hereof. The advertisements are scheduled to run from August 31 to mid-October.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 22, 2020

Woodland Hills, California

/s/ Katie Nownes

Katie Nownes

Chief Operating Officer

OMNI AGENT SOLUTIONS