IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC,¹

Debtors.

Chapter 11

Case No. 20-10343 (LSS)

(Jointly Administered)

NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON SEPTEMBER 23, 2021, AT 10:00 A.M. EASTERN TIME

This remote hearing will be conducted entirely over Zoom and requires all participants to register in advance. Please register by September 23, 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-igrjgtGW6cE6mUjUEIWFTfoFINNtA

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

Topic: Boy Scouts of America

Time: September 23, 2021, at 10:00 a.m. Eastern Time (US and Canada)

RESOLVED MATTERS

1. Motion of "John Doe" to Permit Filing of Proof of Claim After Bar Date (D.I. 6108, filed 8/23/21).

Objection Deadline: September 7, 2021 at 4:00 p.m. (ET).

Responses Received: None.

Related Pleadings:

a) Certification of Counsel Regarding Motion of "John Doe" to Permit Filing of Proof of Claim After Bar Date (D.I. 6242, filed 9/16/21); and

¹ 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.

b) Order Authorizing "John Doe" to File Proof of Claim (<u>D.I. 6260</u>, filed 9/17/21).

Status: An order has been entered. No hearing is necessary.

MATTERS UNDER CERTIFICATION

2. Debtors' Fifth Motion for Entry of an Order Under 28 U.S.C. § 1425 and Fed. R. P. 9006(b) and 9027, Extending the Period Within Which the Debtors May Remove Civil Actions and Granting Related Relief (D.I. 6187, filed 9/9/21).

Objection Deadline: September 16, 2021 at 4:00 p.m. (ET).

Responses Received: None.

Related Pleadings:

a) Certificate of No Objection Regarding Debtors' Fifth Motion for Entry of an Order Under 28 U.S.C. § 1425 and Fed. R. P. 9006(b) and 9027, Extending the Period Within Which the Debtors May Remove Civil Actions and Granting Related Relief (D.I. 6277, filed 9/17/21).

<u>Status</u>: A certification of no objection has been filed. No hearing is necessary unless the court has questions.

3. Debtors' Motion for Entry of an Order (I) Approving Lehr Settlement Agreement and (II) Modifying the Automatic Stay, to the Extent Necessary, to Permit Payment of Settlement Amount by Applicable Insurance (D.I. 2719, filed 4/28/21).

Objection Deadline: May 12, 2021, at 4:00 p.m. (ET).

Responses Received:

- a) (*WITHDRAWN*) Objection of the Tort Claimants' Committee to Debtors' Motion for Entry of an Order (I) Approving Lehr Settlement Agreement and (II) Modifying the Automatic Stay, to the Extent Necessary, to Permit Payment of Settlement Amount by Applicable Insurance (<u>D.I. 3781</u>, filed 5/12/21);
- b) (*WITHDRAWN*) Joinder of the Future Claimants' Representative to the Objection of the Tort Claimants' Committee to Debtors' Motion for Entry of an Order (I) Approving Lehr Settlement Agreement and (II) Modifying the Automatic Stay, to the Extent Necessary, to Permit Payment of Settlement Amount by Applicable Insurance (D.I. 3851, 5/12/21); and
- c) (WITHDRAWN) Joinder and Statement of Support of the Coalition of Abused Scouts for Justice Regarding Objections to First Mediators' Report (D.I. 3854, filed 5/12/21).

Related Pleadings:

a) Certificate of No Objection Regarding Debtors' Motion for Entry of an Order (I) Approving Lehr Settlement Agreement and (II) Modifying the Automatic Stay, to the Extent Necessary, to Permit Payment of Settlement Amount by Applicable Insurance (D.I. 6310, filed 9/20/21).

<u>Status</u>: The objections filed in response to this motion have been withdrawn and a certification of no objection has been filed. No hearing is necessary unless the court has questions.

MATTERS GOING FORWARD

4. Debtors' Motion for Entry of an Order (I) Approving Knight Settlement Agreement and (II) Modifying the Automatic Stay, to the Extent Necessary to Permit Payment of Settlement Amount by Applicable Insurance. (D.I. 6154, filed 9/2/21).

Objection Deadline: September 16, 2021 at 4:00 p.m. (ET).

Responses Received:

a) Substantive Objection to Debtors Motion for Entry of Order Approving Knight Settlement Agreement, Modifying the Automatic Stay, to the Extent Necessary to Permit Settlement amount by Applicable Insurance (D.I.6236, filed 9/16/21).

Related Pleadings:

a) Omnibus Reply of Debtors in Further Support of (A) Debtors' Motion for Entry of an Order (I) Approving Knight Settlement Agreement and (II) Modifying the Automatic Stay, to the Extent Necessary, to Permit Payment of Settlement Amount by Applicable Insurance; and (B) Debtors' Settlement Motion for Entry of an Order (I) Approving Romero Settlement Agreement and (II) Modifying the Automatic Stay, to the Extent Necessary, to Permit Payment of Settlement Amount by Applicable Insurance (D.I. 6302, filed 9/20/21).

<u>Status</u>: This matter is going forward.

5. Debtors' Motion for Entry of an Order (I) Approving Romero Settlement Agreement and (II) Modifying the Automatic Stay, to the Extent Necessary to Permit Payment of Settlement Amount by Applicable Insurance. (D.I. 6155, filed 9/2/21).

Objection Deadline: September 16, 2021 at 4:00 p.m. (ET).

Responses Received:

a) Substantive Objection to Debtors Motion for Entry of an Order Approving Romero Settlement Agreement, Modifying Automatic Stay and Permitting Payment by Insurance (D.I. 6237, filed 9/16/21).

Related Pleadings:

 a) Omnibus Reply of Debtors in Further Support of (A) Debtors' Motion for Entry of an Order (I) Approving Knight Settlement Agreement and (II) Modifying the Automatic Stay, to the Extent Necessary, to Permit Payment of Settlement Amount by Applicable Insurance; and (B) Debtors' Settlement Motion for Entry of an Order (I) Approving Romero Settlement Agreement and (II) Modifying the Automatic Stay, to the Extent Necessary, to Permit Payment of Settlement Amount by Applicable Insurance (D.I. 6302, filed 9/20/21).

Status: This matter is going forward.

Dated: September 21, 2021 Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Paige N. Topper

Derek C. Abbott (No. 3376) Andrew R. Remming (No. 5120) Paige N. Topper (No. 6470) 1201 North Market Street, 16th Floor Wilmington, Delaware 19899-1347 Telephone: (302) 658-9200 Facsimile: (302) 425-4664 Email: dabbott@morrisnichols.com aremming@morrisnichols.com

- and -

WHITE & CASE LLP

Jessica C. Lauria (admitted *pro hac vice*) 1221 Avenue of the Americas New York, New York 10020 Telephone: (212) 819-8200 Email: jessica.lauria@whitecase.com

- and -

WHITE & CASE LLP

Michael C. Andolina (admitted *pro hac vice*) Matthew E. Linder (admitted *pro hac vice*) Laura E. Baccash (admitted *pro hac vice*) Blair M. Warner (admitted *pro hac vice*) 111 South Wacker Drive Chicago, Illinois 60606 Telephone: (312) 881-5400 Email: mandolina@whitecase.com mlinder@whitecase.com laura.baccash@whitecase.com blair.warner@whitecase.com

ATTORNEYS FOR THE DEBTORS AND DEBTORS IN POSSESSION