

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC, ¹ <p style="text-align: right;">Debtors.</p>	Chapter 11 Case No. 20-10343 (LSS) Jointly Administered
BOY SCOUTS OF AMERICA, <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> A.A., et al., ² <p style="text-align: right;">Defendants.</p>	Adv. Pro. No. 20-50527 (LSS) Re: Docket No. 77

**CERTIFICATE OF SERVICE WITH RESPECT TO NOTICES OF PRELIMINARY
INJUNCTION ACKNOWLEDGMENT DEFAULT**

I, Hung Phan, hereby certify that on July 7, 2020, I caused a true and correct copy of the applicable *Notice of Preliminary Injunction Acknowledgment Default* attached hereto to be served to the parties below via U.S. Mail.

VIA U.S. MAIL		
Atlanta Area Council 1800 Circle 75, Pkwy SE Atlanta, GA 30339	Baltimore Area Council 701 Wyman Park Drive Baltimore, MD 21211-2805	Blue Mountain Council 8478 West Gage Street Kennewick, WA 99336-1075
Cimarron Council 317 N. Grand Street Enid, OK 73701-4124	Conquistador Council 2603 N. Aspen Roswell, NM 88201-9785	East Carolina Council 313 Center Blvd., POB 1698 Kinston, NC 28501
Grand Teton Council 3910 South Yellowstone Hwy Idaho Falls, ID 83402	Mason-Dixon Council 18600 Crestwood Dr. Hagerstown, MD 21742-2133	

¹ 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.

² A full list of the Defendants in this adversary proceeding was included in redacted form on Exhibit A to the BSA’s Verified Complaint for Injunctive Relief [A.D.I No. 1] to protect the privacy interests of abuse victims. A revised proposed redacted version of the Complaint and Exhibit A thereto was filed on or about February 26, 2020 [A.D.I No. 14-1]. An unredacted version of the Complaint and Exhibit A thereto have been served on each Defendant’s counsel.

I further certify that, on July 7, 2020, I caused copies of all of the *Notices of Preliminary Injunction Acknowledgement Default* to be served on the parties listed below by electronic mail.

VIA ELECTRONIC MAIL	
Boy Scouts of America	SE.Legal@scouting.org
Ad Hoc Committee of Local Councils	Local_Council_Committee@wlrk.com
Trevor Grayeb	tgrayeb@sidley.com
Matthew Linder	mlinder@sidley.com
Kevin Carey	kevin.carey@hoganlovells.com
Paul Finn	PFinn@commonwealthmediation.com
Timothy Gallagher	timg@thegallaghergroup.com

Date: July 8, 2020

/s/ Hung Phan

Hung Phan

John W. Lucas

July 7, 2020

415.217.5108
jlucas@pszjlaw.com



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TELEPHONE: 714/384 4750
FACSIMILE: 714/384 4751

VIA U.S. MAIL

Atlanta Area Council
1800 Circle 75 Pkwy SE
Atlanta, GA 30339

**Re: Boy Scouts of America:
Local Council Acknowledgment - Ten Day Notice**

Dear Executive Director of Atlanta Area Council:

Pachulski Stang Ziehl & Jones LLP is counsel to the Official Committee of Tort Claimants in the chapter 11 case of the Boy Scouts of America, Case No. 20-10343. Pursuant to the Bankruptcy Court’s order entitled *Second Stipulation and Agreed Order By and Among the Boy Scouts of America, the Official Committee of Survivors of Abuse, and the Official Committee of Unsecured Creditors Modifying the Consent Order Granting the BSA’s Motion For A Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(A) and 362 and Further Extending the Termination Date of the Standstill Period* [Adv. Docket No. 77] (the “Second Stipulation”) entered in the adversary proceeding entitled *Boy Scouts of America v. A.A., et al.*, Adv. Pro. No. 20-50527, you are hereby notified that Atlanta Area Council has failed to execute and deliver to the Boy Scouts of America an “Acknowledgment and Agreement” (Exhibit 4 to the Second Stipulation) by July 6, 2020. You are further notified that if you do not execute and deliver to Boy Scouts of America an Acknowledgment and Agreement by July 21, 2020, the Official Committee of Tort Claimants may file a notice of termination and certification of counsel of a proposed order terminating the preliminary injunction and that such order shall terminate the preliminary injunction as to Atlanta Area Council. Under the terms of the Second Stipulation, the Boy Scouts of America does not have right to move for reinstatement of the preliminary injunction.

Yours Truly,

John W. Lucas

cc: Boy Scouts of America (SE.Legal@scouting.org)
Ad Hoc Committee of Local Councils
(Local_Council_Committee@wirk.com)
Trevor Grayeb (tgrayeb@sidley.com)
Matthew Linder (mlinder@sidley.com)
Kevin Carey (kevin.carey@hoganlovells.com)
Paul Finn (PFinn@commonwealthmediation.com)
Timothy Gallagher (timg@thegallaghergroup.com)

John W. Lucas

July 7, 2020

415.217.5108
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VIA U.S. MAIL

Baltimore Area Council
701 Wyman Park Drive
Baltimore, MD 21211-2805

**Re: Boy Scouts of America:
Local Council Acknowledgment - Ten Day Notice**

Dear Executive Director of Baltimore Area Council:

Pachulski Stang Ziehl & Jones LLP is counsel to the Official Committee of Tort Claimants in the chapter 11 case of the Boy Scouts of America, Case No. 20-10343. Pursuant to the Bankruptcy Court’s order entitled *Second Stipulation and Agreed Order By and Among the Boy Scouts of America, the Official Committee of Survivors of Abuse, and the Official Committee of Unsecured Creditors Modifying the Consent Order Granting the BSA’s Motion For A Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(A) and 362 and Further Extending the Termination Date of the Standstill Period* [Adv. Docket No. 77] (the “Second Stipulation”) entered in the adversary proceeding entitled *Boy Scouts of America v. A.A., et al.*, Adv. Pro. No. 20-50527, you are hereby notified that Baltimore Area Council has failed to execute and deliver to the Boy Scouts of America an “Acknowledgment and Agreement” (Exhibit 4 to the Second Stipulation) by July 6, 2020. You are further notified that if you do not execute and deliver to Boy Scouts of America an Acknowledgment and Agreement by July 21, 2020, the Official Committee of Tort Claimants may file a notice of termination and certification of counsel of a proposed order terminating the preliminary injunction and that such order shall terminate the preliminary injunction as to Baltimore Area Council. Under the terms of the Second Stipulation, the Boy Scouts of America does not have right to move for reinstatement of the preliminary injunction.

Yours Truly,

John W. Lucas

cc: Boy Scouts of America (SE.Legal@scouting.org)
Ad Hoc Committee of Local Councils
(Local_Council_Committee@wirk.com)
Trevor Grayeb (tgrayeb@sidley.com)
Matthew Linder (mlinder@sidley.com)
Kevin Carey (kevin.carey@hoganlovells.com)
Paul Finn (PFinn@commonwealthmediation.com)
Timothy Gallagher (timg@thegallaghergroup.com)

John W. Lucas

July 7, 2020

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WEB: www.pszjlaw.com

VIA U.S. MAIL

Blue Mountain Council
8478 West Gage Street
Kennewick, WA 99336-1075

**Re: Boy Scouts of America:
Local Council Acknowledgment - Ten Day Notice**

Dear Executive Director of Blue Mountain Council:

Pachulski Stang Ziehl & Jones LLP is counsel to the Official Committee of Tort Claimants in the chapter 11 case of the Boy Scouts of America, Case No. 20-10343. Pursuant to the Bankruptcy Court’s order entitled *Second Stipulation and Agreed Order By and Among the Boy Scouts of America, the Official Committee of Survivors of Abuse, and the Official Committee of Unsecured Creditors Modifying the Consent Order Granting the BSA’s Motion For A Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(A) and 362 and Further Extending the Termination Date of the Standstill Period* [Adv. Docket No. 77] (the “Second Stipulation”) entered in the adversary proceeding entitled *Boy Scouts of America v. A.A., et al.*, Adv. Pro. No. 20-50527, you are hereby notified that Blue Mountain Council has failed to execute and deliver to the Boy Scouts of America an “Acknowledgment and Agreement” (Exhibit 4 to the Second Stipulation) by July 6, 2020. You are further notified that if you do not execute and deliver to Boy Scouts of America an Acknowledgment and Agreement by July 21, 2020, the Official Committee of Tort Claimants may file a notice of termination and certification of counsel of a proposed order terminating the preliminary injunction and that such order shall terminate the preliminary injunction as to Blue Mountain Council. Under the terms of the Second Stipulation, the Boy Scouts of America does not have right to move for reinstatement of the preliminary injunction.

Yours Truly,

John W. Lucas

cc: Boy Scouts of America (SE.Legal@scouting.org)
Ad Hoc Committee of Local Councils
(Local_Council_Committee@wirk.com)
Trevor Grayeb (tgrayeb@sidley.com)
Matthew Linder (mlinder@sidley.com)
Kevin Carey (kevin.carey@hoganlovells.com)
Paul Finn (PFinn@commonwealthmediation.com)
Timothy Gallagher (timg@thegallaghergroup.com)

John W. Lucas

July 7, 2020

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FACSIMILE: 714/384 4751

VIA U.S. MAIL

Cimarron Council
317 N. Grand Street
Enid, OK 73701-4124

**Re: Boy Scouts of America:
Local Council Acknowledgment - Ten Day Notice**

Dear Executive Director of Cimarron Council:

Pachulski Stang Ziehl & Jones LLP is counsel to the Official Committee of Tort Claimants in the chapter 11 case of the Boy Scouts of America, Case No. 20-10343. Pursuant to the Bankruptcy Court’s order entitled *Second Stipulation and Agreed Order By and Among the Boy Scouts of America, the Official Committee of Survivors of Abuse, and the Official Committee of Unsecured Creditors Modifying the Consent Order Granting the BSA’s Motion For A Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(A) and 362 and Further Extending the Termination Date of the Standstill Period* [Adv. Docket No. 77] (the “Second Stipulation”) entered in the adversary proceeding entitled *Boy Scouts of America v. A.A., et al.*, Adv. Pro. No. 20-50527, you are hereby notified that Cimarron Council has failed to execute and deliver to the Boy Scouts of America an “Acknowledgment and Agreement” (Exhibit 4 to the Second Stipulation) by July 6, 2020. You are further notified that if you do not execute and deliver to Boy Scouts of America an Acknowledgment and Agreement by July 21, 2020, the Official Committee of Tort Claimants may file a notice of termination and certification of counsel of a proposed order terminating the preliminary injunction and that such order shall terminate the preliminary injunction as to Cimarron Council. Under the terms of the Second Stipulation, the Boy Scouts of America does not have right to move for reinstatement of the preliminary injunction.

Yours Truly,

John W. Lucas

cc: Boy Scouts of America (SE.Legal@scouting.org)
Ad Hoc Committee of Local Councils
(Local_Council_Committee@wirk.com)
Trevor Grayeb (tgrayeb@sidley.com)
Matthew Linder (mlinder@sidley.com)
Kevin Carey (kevin.carey@hoganlovells.com)
Paul Finn (PFinn@commonwealthmediation.com)
Timothy Gallagher (timg@thegallaghergroup.com)

John W. Lucas

July 7, 2020

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FACSIMILE: 714/384 4751

VIA U.S. MAIL

Conquistador Council
2603 N Aspen
Roswell, NM 88201-9785

**Re: Boy Scouts of America:
Local Council Acknowledgment - Ten Day Notice**

Dear Executive Director of Conquistador Council:

Pachulski Stang Ziehl & Jones LLP is counsel to the Official Committee of Tort Claimants in the chapter 11 case of the Boy Scouts of America, Case No. 20-10343. Pursuant to the Bankruptcy Court’s order entitled *Second Stipulation and Agreed Order By and Among the Boy Scouts of America, the Official Committee of Survivors of Abuse, and the Official Committee of Unsecured Creditors Modifying the Consent Order Granting the BSA’s Motion For A Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(A) and 362 and Further Extending the Termination Date of the Standstill Period* [Adv. Docket No. 77] (the “Second Stipulation”) entered in the adversary proceeding entitled *Boy Scouts of America v. A.A., et al.*, Adv. Pro. No. 20-50527, you are hereby notified that Conquistador Council has failed to execute and deliver to the Boy Scouts of America an “Acknowledgment and Agreement” (Exhibit 4 to the Second Stipulation) by July 6, 2020. You are further notified that if you do not execute and deliver to Boy Scouts of America an Acknowledgment and Agreement by July 21, 2020, the Official Committee of Tort Claimants may file a notice of termination and certification of counsel of a proposed order terminating the preliminary injunction and that such order shall terminate the preliminary injunction as to Conquistador Council. Under the terms of the Second Stipulation, the Boy Scouts of America does not have right to move for reinstatement of the preliminary injunction.

Yours Truly,

John W. Lucas

cc: Boy Scouts of America (SE.Legal@scouting.org)
Ad Hoc Committee of Local Councils
(Local_Council_Committee@wirk.com)
Trevor Grayeb (tgrayeb@sidley.com)
Matthew Linder (mlinder@sidley.com)
Kevin Carey (kevin.carey@hoganlovells.com)
Paul Finn (PFinn@commonwealthmediation.com)
Timothy Gallagher (timg@thegallaghergroup.com)

John W. Lucas

July 7, 2020

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FACSIMILE: 714/384 4751

VIA U.S. MAIL

East Carolina Council
313 Center Blvd., POB 1698
Kinston, NC 28501

**Re: Boy Scouts of America:
Local Council Acknowledgment - Ten Day Notice**

Dear Executive Director of East Carolina Council:

Pachulski Stang Ziehl & Jones LLP is counsel to the Official Committee of Tort Claimants in the chapter 11 case of the Boy Scouts of America, Case No. 20-10343. Pursuant to the Bankruptcy Court’s order entitled *Second Stipulation and Agreed Order By and Among the Boy Scouts of America, the Official Committee of Survivors of Abuse, and the Official Committee of Unsecured Creditors Modifying the Consent Order Granting the BSA’s Motion For A Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(A) and 362 and Further Extending the Termination Date of the Standstill Period* [Adv. Docket No. 77] (the “Second Stipulation”) entered in the adversary proceeding entitled *Boy Scouts of America v. A.A., et al.*, Adv. Pro. No. 20-50527, you are hereby notified that East Carolina Council has failed to execute and deliver to the Boy Scouts of America an “Acknowledgment and Agreement” (Exhibit 4 to the Second Stipulation) by July 6, 2020. You are further notified that if you do not execute and deliver to Boy Scouts of America an Acknowledgment and Agreement by July 21, 2020, the Official Committee of Tort Claimants may file a notice of termination and certification of counsel of a proposed order terminating the preliminary injunction and that such order shall terminate the preliminary injunction as to East Carolina Council. Under the terms of the Second Stipulation, the Boy Scouts of America does not have right to move for reinstatement of the preliminary injunction.

Yours Truly,

John W. Lucas

cc: Boy Scouts of America (SE.Legal@scouting.org)
Ad Hoc Committee of Local Councils
(Local_Council_Committee@wirk.com)
Trevor Grayeb (tgrayeb@sidley.com)
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John W. Lucas

July 7, 2020

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WEB: www.pszjlaw.com

VIA U.S. MAIL

Grand Teton Council
3910 South Yellowstone Highway
Idaho Falls, ID 83402

**Re: Boy Scouts of America:
Local Council Acknowledgment - Ten Day Notice**

Dear Executive Director of Grand Teton Council:

Pachulski Stang Ziehl & Jones LLP is counsel to the Official Committee of Tort Claimants in the chapter 11 case of the Boy Scouts of America, Case No. 20-10343. Pursuant to the Bankruptcy Court’s order entitled *Second Stipulation and Agreed Order By and Among the Boy Scouts of America, the Official Committee of Survivors of Abuse, and the Official Committee of Unsecured Creditors Modifying the Consent Order Granting the BSA’s Motion For A Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(A) and 362 and Further Extending the Termination Date of the Standstill Period* [Adv. Docket No. 77] (the “Second Stipulation”) entered in the adversary proceeding entitled *Boy Scouts of America v. A.A., et al.*, Adv. Pro. No. 20-50527, you are hereby notified that Grand Teton Council has failed to execute and deliver to the Boy Scouts of America an “Acknowledgment and Agreement” (Exhibit 4 to the Second Stipulation) by July 6, 2020. You are further notified that if you do not execute and deliver to Boy Scouts of America an Acknowledgment and Agreement by July 21, 2020, the Official Committee of Tort Claimants may file a notice of termination and certification of counsel of a proposed order terminating the preliminary injunction and that such order shall terminate the preliminary injunction as to Grand Teton Council. Under the terms of the Second Stipulation, the Boy Scouts of America does not have right to move for reinstatement of the preliminary injunction.

Yours Truly,

John W. Lucas

cc: Boy Scouts of America (SE.Legal@scouting.org)
Ad Hoc Committee of Local Councils
(Local_Council_Committee@wirk.com)
Trevor Grayeb (tgrayeb@sidley.com)
Matthew Linder (mlinder@sidley.com)
Kevin Carey (kevin.carey@hoganlovells.com)
Paul Finn (PFinn@commonwealthmediation.com)
Timothy Gallagher (timg@thegallaghergroup.com)

John W. Lucas

July 7, 2020

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VIA U.S. MAIL

Mason-Dixon Council
18600 Crestwood Dr.
Hagerstown, MD 21742-2133

**Re: Boy Scouts of America:
Local Council Acknowledgment - Ten Day Notice**

Dear Executive Director of Mason-Dixon Council:

Pachulski Stang Ziehl & Jones LLP is counsel to the Official Committee of Tort Claimants in the chapter 11 case of the Boy Scouts of America, Case No. 20-10343. Pursuant to the Bankruptcy Court’s order entitled *Second Stipulation and Agreed Order By and Among the Boy Scouts of America, the Official Committee of Survivors of Abuse, and the Official Committee of Unsecured Creditors Modifying the Consent Order Granting the BSA’s Motion For A Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(A) and 362 and Further Extending the Termination Date of the Standstill Period* [Adv. Docket No. 77] (the “Second Stipulation”) entered in the adversary proceeding entitled *Boy Scouts of America v. A.A., et al.*, Adv. Pro. No. 20-50527, you are hereby notified that Mason-Dixon Council has failed to execute and deliver to the Boy Scouts of America an “Acknowledgment and Agreement” (Exhibit 4 to the Second Stipulation) by July 6, 2020. You are further notified that if you do not execute and deliver to Boy Scouts of America an Acknowledgment and Agreement by July 21, 2020, the Official Committee of Tort Claimants may file a notice of termination and certification of counsel of a proposed order terminating the preliminary injunction and that such order shall terminate the preliminary injunction as to Mason-Dixon Council. Under the terms of the Second Stipulation, the Boy Scouts of America does not have right to move for reinstatement of the preliminary injunction.

Yours Truly,

John W. Lucas

cc: Boy Scouts of America (SE.Legal@scouting.org)
Ad Hoc Committee of Local Councils
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