

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

In re:

BOY SCOUTS OF AMERICA and
DELAWARE BSA, LLC,
Debtors.

Chapter 11

Civil Action No. 20-cv-00798 (RGA)

STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME

WHEREAS, Appellants commenced this appeal regarding the June 2, 2020 Order of the United States Bankruptcy Court for the District of Delaware authorizing the retention of Sidley LLP as counsel to the debtors over the objection of Century (D.I. 1);

WHEREAS, the Notice of appeal names the debtors in this matter – Boy Scouts of America and Delaware BSA, Inc. – as the Appellees to this appeal;

WHEREAS, Sidley Austin LLP, represented by its own counsel, appeared before the bankruptcy court and submitted its own briefing in support of the Debtors' motion for its retention and its application before the Bankruptcy Court and intends to appear in this appeal and argue in support of the June 2, 2020 Order approving its retention; and

WHEREAS, the parties have agreed that the notice of appeal should be amended to reflect Sidley Austin LLP's status as an appellee in this matter, that the amendment of the notice of appeal will relate back and have the benefit of the filing date of the original notice of appeal, and that there should be a 30-day extension to the briefing schedule entered by the Court on July 1, 2020 (D.I. 10) so that the deadline for the filing of opening briefs in this matter is extended up to and including Monday, August 31, 2020.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto, through their respective counsel and subject to the approval of the Court, that the briefing schedule entered by the Court on July 1, 2020 (D.I. 10) will be amended so that (1) Appellants' Opening Brief is due on August 31, 2020, (2) Appellees' Answering Briefs are due on September 30, 2020, and (3) Appellants' Reply Brief is due on October 14, 2020 (see 1. footnote).

Dated: July 13, 2020

Respectfully Submitted,

By: /s/ Stamatios Stamoulis
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Counsel for Appellants Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America and Indemnity Insurance Company of North America, Westchester Fire Insurance Company and Westchester Surplus Lines Insurance Company ("Century")

/s/ Derek C. Abbott

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SO ORDERED this 22 day of July, 2020.

/s/ Richard G. Andrews

United States District Court Judge

1. As I understand it, this is an appeal from an order of the Bankruptcy Court concerning the representation of the Debtors. Appellants are in no hurry to brief the appeal. Counsel for Appellants say they have other commitments. They work for one of the largest law firms in the world, with essentially a limitless supply of attorneys to draw upon. If Appellants are serious about their appeal, I would expect them to be pushing the appeal along, not dawdling.