

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

<p>In re:</p> <p>BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC</p> <p style="text-align: right;">Debtors.¹</p>	<p>⋮</p> <p>⋮</p> <p>⋮</p> <p>⋮</p> <p>⋮</p> <p>⋮</p> <p>⋮</p>	<p>Chapter 11</p> <p>Case No. 20-10343 (LSS)</p> <p>(Jointly Administered)</p>
---	--	--

**VERIFIED STATEMENT OF COALITION OF ABUSED SCOUTS FOR JUSTICE
PURSUANT TO BANKRUPTCY RULE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, amended as of December 1, 2011 (“Rule 2019”), the Coalition of Abused Scouts for Justice (the “Coalition”), by its undersigned counsel, hereby submits this verified statement (the “Verified Statement”) in the Chapter 11 cases of the above-captioned debtors (collectively, the “Debtors” and the “Bankruptcy Cases”) and, in support thereof, states:

1. On or around July 18, 2020, the members of the Coalition, by and through their counsel, formed the Coalition and retained Brown Rudnick LLP and Blank Rome LLP (together, the “Coalition Counsel”) to represent them in connection with the Coalition’s claims and interests in respect of the Debtors and the Bankruptcy Cases. The Coalition is comprised of more than 10,000 sexual abuse victims (collectively, the “Coalition Members”). Each Coalition Member, a party-in-interest, holds claims against the Debtors that may include, but are not necessarily limited to, unsecured claims and administrative claims.

2. Each Coalition Member is a Sexual Abuse Survivor (as defined in the Debtors’ bar date order [D.I. 695]). As a result, the identity of each member is highly confidential. Nonetheless,

¹ 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.

in accordance with Rule 2019, a list of the names and addresses of each current Coalition Member may be provided upon request by a proper party in interest and subject to a confidentiality agreement, or may otherwise be filed with the Court or provided to the Office of the United States Trustee under seal.

3. Nothing contained in this Verified Statement should be construed as (i) a waiver or release of any claims filed or to be filed against, or interests in, the Debtors held by any Coalition Member or any other entity, or (ii) a limitation upon, or waiver of, any Coalition Member's rights to assert, file and/or amend its claims in accordance with applicable law and any orders entered in these cases establishing procedures for filing proofs of claim.

4. Other than as disclosed herein, the Coalition Counsel does not represent or purport to represent any other entities with respect to the Bankruptcy Cases.² In addition, the Coalition Members and the Coalition do not purport to act, represent, or speak on behalf of any other entities in connection with the Bankruptcy Cases.

5. The undersigned declares under penalty of perjury that this Verified Statement is true and accurate to the best of his/her knowledge, information and belief.

² Blank Rome LLP, Delaware counsel to the Coalition, has in the past represented Lianfen Qian, a personal injury claimant, and currently represents Infor (US), Inc., a software licensor to the Debtors, in the Bankruptcy Cases in matters unrelated to the Coalition. Blank Rome LLP has set up an ethical wall between the attorneys representing the Coalition and the attorney representing Infor (US), Inc. in the Bankruptcy Cases. Blank Rome LLP will not represent the Coalition or any Coalition Member in any matter that may be adverse to Infor (US), Inc.

6. The Coalition reserves the right to amend or supplement this Verified Statement in accordance with the requirements set forth in Rule 2019.

Dated: July 29, 2020
Wilmington, Delaware

BLANK ROME LLP

/s/ Stanley B. Tarr

Stanley B. Tarr (DE No. 5535)
1201 Market Street, Suite 800
Wilmington, Delaware 19801
Telephone: (302) 425-6423
Facsimile: (302) 252-0921
E-mail: Tarr@BlankRome.com

-and-

BROWN RUDNICK LLP

David J. Molton, Esquire
BROWN RUDNICK LLP
Seven Times Square
New York, NY 10036
Telephone: (212) 209-4800
E-mail: DMolton@brownrudnick.com

and

Sunni P. Beville, Esquire
Tristan G. Axelrod, Esquire
BROWN RUDNICK LLP
One Financial Center
Boston, MA 02111
Telephone: (617) 856-8200
E-mail: sbeville@brownrudnick.com
E-mail: taxelrod@brownrudnick.com

Co-Counsel to the Coalition of Abused Scouts for Justice