

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

In re:

BOY SCOUTS OF AMERICA and  
DELAWARE BSA, LLC,<sup>1</sup>

Debtors.

HARTFORD ACCIDENT AND INDEMNITY  
COMPANY AND FIRST STATE INSURANCE  
COMPANY,

Plaintiffs,

v.

BOY SCOUTS OF AMERICA; *et al*,

Defendants.

Chapter 11

Case No. 20-10343 (LSS)

Jointly Administered

Adv. Proc. No. 20-50601-LSS

**NOTICE OF APPEARANCE, REQUEST FOR SERVICE OF PAPERS  
AND RESERVATION OF RIGHTS**

PLEASE TAKE NOTICE, that the undersigned attorneys hereby appear as counsel for National Union Fire Insurance Company of Pittsburgh, PA; Lexington Insurance Company; Landmark Insurance Company; The Insurance Company of the State of Pennsylvania; and their affiliated entities (collectively referenced herein as “AIG”), parties in interest in the above-captioned case and hereby requests, pursuant to U.S. Bankruptcy Court Rules 2002 and 9007, and 11 U.S.C. §§342 and 1109(b) of the U.S. Bankruptcy Code, that all copies and pleadings given or filed in this case be given and served upon counsel at the following addresses and telephone numbers:

<sup>1</sup> The Debtors in these 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.

**Deirdre M. Richards, Esquire**  
**Fineman Krekstein & Harris PC**  
[drichards@finemanlawfirm.com](mailto:drichards@finemanlawfirm.com)  
**1300 N. King Street**  
**Wilmington, DE 19801**  
**Telephone: (302) 538-8331**  
**Facsimile: (302) 394-9228**

PLEASE TAKE FURTHER NOTICE that this request includes not only notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, e-mail, hand delivery, telephone, telegraph, facsimile, telex, or otherwise: (1) that affects or seeks to affect in any way any rights or interest of any creditor or any party-in-interest in this case, including AIG with respect to (a) the debtor; (b) property of the estate or proceeds thereof, in which the debtor may claim an interest; or (c) property or proceeds thereof in the possession, custody or control of others that the debtor may seek to use; or (2) that requires or seeks to require any act, delivery of any property, payment, or conduct by the delivery of any property, payment, or other conduct by AIG.

PLEASE TAKE FURTHER NOTICE that AIG intends that neither this Entry of Appearance nor any later appearance, claim, or other pleadings shall waive (1) AIG's right to have final Orders in non-core matters entered only after *de novo* review by the United States District Court; (2) AIG's right to trial by jury in any proceeding related to this case; (3) AIG's right to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any rights, claims, actions, defenses, set-offs or

recruitments to which AIG is or may be entitled to under agreement, in law or at equity, all of which rights, claims, actions, defenses, set-off or recruitments AIG hereby expressly reserves.

**FINEMAN KREKSTEIN & HARRIS PC**

By: /s/Deirdre M. Richards  
Deirdre M. Richards (#4191)  
1300 N. King Street  
Wilmington, DE 19801  
Telephone: (302) 538-8331  
Facsimile: (302) 394-9228  
[d Richards@finemanlawfirm.com](mailto:d Richards@finemanlawfirm.com)

*Attorneys for Defendants National Union Fire  
Insurance Company of Pittsburgh, PA; Lexington  
Insurance Company; Landmark Insurance  
Company; The Insurance Company of the State of  
Pennsylvania; and their affiliated entities*

Dated: August 10, 2020