

**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

**Re: Doc. ID.: # 1, 16**

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING  
FURTHER STIPULATION FOR EXTENSION OF TIME**

Counsel to the Defendants National Union Fire Insurance Company of Pittsburgh PA (“National Union”), Lexington Insurance Company (“Lexington”), Landmark Insurance Company (“Landmark”) and The Insurance Company of the State of Pennsylvania (“ICOSP”) (collectively referred to as the “AIG Defendants”) hereby certifies as follows:

1. On or around May 15, 2020, Plaintiffs Hartford Accident and Indemnity Company and First State Insurance Company (the “Plaintiffs”) commenced the above-captioned adversary action by filing a Complaint [D.I. 1], against, the AIG Defendants, among others.
2. Plaintiffs have agreed to extend the time further by which the AIG Defendants must answer, move or otherwise respond to the Complaint to and including October 7, 2020, as set forth in a Stipulation among Plaintiffs and the AIG Defendants.

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<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.

3. Accordingly, the AIG Defendants respectfully request that this Court enter the Order attached hereto as Exhibit “A” approving the Stipulation attached to the Order (as Schedule “1”) at the Court’s earliest convenience.

Dated: September 9, 2020

Respectfully Submitted,

FINEMAN KREKSTEIN & HARRIS PC

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Company, Landmark Insurance Company and The  
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**EXHIBIT “A”**

**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)

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Adv. Proc. No. 20-50601-LSS

**Re: Doc. ID.: # 1, 16**

**[PROPOSED] ORDER APPROVING STIPULATION [D.I. # 16] FOR EXTENSION OF TIME**

THIS COURT, having considered the Further Stipulation for Extension of Time (the “Stipulation”) attached hereto as **Exhibit “1”** by and between (1) the above-captioned plaintiffs (the “Plaintiffs”) and (2) the defendants National Union Fire Insurance Company of Pittsburgh PA (“National Union”), Lexington Insurance Company (“Lexington”), Landmark Insurance Company (“Landmark”) and The Insurance Company of the State of Pennsylvania (“ICOSP”)(collectively referred to as the “AIG Defendants”);, and the Court having determined that good and adequate cause exists for the approval of the Stipulation and extension of time therein, pursuant to Fed. R. Bankr. P. 9006(b)(1) and Delaware Bankr. LR 7012-3; and the Court having determined that no other or further notice of the Stipulation need be given,

IT IS HEREBY ORDERED THAT:

1. The Stipulation is APPROVED.

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<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.

2. The time within which the AIG Defendants must answer, move or otherwise respond to the Complaint [ Doc. DI #1] shall be and hereby is, extended to and including October 7, 2020.
3. This Order shall be effective immediately upon entry on the docket.
4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

**EXHIBIT “1”**

**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

**FURTHER STIPULATION FOR EXTENSION OF TIME**

Plaintiffs Hartford Accident and Indemnity Company and First State Insurance Company (collectively, "Plaintiffs") and Defendants National Union Fire Insurance Company of Pittsburgh PA ("National Union"), Lexington Insurance Company ("Lexington"), Landmark Insurance Company ("Landmark") and The Insurance Company of the State of Pennsylvania ("ICOSP")(collectively referred to as the "AIG Defendants") hereby further stipulate and agree that time within which the AIG Defendants must answer or otherwise plead in response to the

[remainder of page intentionally blank]

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Plaintiffs Complaint in the above captioned adversary proceeding shall be extended up to and including October 7, 2020.

Respectfully Submitted,

Dated: September 9, 2020

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