

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

In re

Boy Scouts of America and Delaware  
BSA, LLC,

Debtors.

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

Century Indemnity Company,

Appellant,

v.

Boy Scouts of America,

Appellee,

Delaware BSA, LLC,

Appellee,

and Sidley Austin LLP,

Appellee.

On appeal from the U.S. Bankruptcy  
Court for the District of Delaware

Bankruptcy Case No. 20-10343 (LSS)  
Bankruptcy BAP No. 20-13

**STIPULATION TO EXTEND TIME TO  
RESPOND TO APPELLANTS' OPENING BRIEF ON APPEAL AND  
REPLY TO APPELLEES' ANSWERING BRIEF**

WHEREAS, counsel for Appellees wrote Appellants seeking a one-week extension of the existing briefing schedule as a professional courtesy (one week extension for Appellees to file their response brief and one week extension for Appellants' reply);

WHEREAS, Appellants conveyed that they will not oppose Appellees' request for a professional courtesy on the understanding that Appellees will not assert that Appellants' non-opposition to Appellees' motion for this additional time prejudices Appellants' position on the merits of the appeal in any way.

IT IS HEREBY STIPULATED by the undersigned 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, and Appellees Boy Scouts of America, Delaware BSA, LLC, and Sidley Austin LLP, subject to approval by the Court, that:

1. The deadline by which Appellees shall respond to Appellants' Opening Brief on Appeal will be extended to October 7, 2020;
2. The deadline by which Appellants shall reply to Appellees' response will be extended to October 21, 2020; and
3. Appellees will not assert that Appellants' non-opposition to their motion for additional time prejudices Appellants' position on the merits of the appeal in any way.

Dated: September 21, 2020

Respectfully Submitted,

By: /s/ Stamatios Stamoulis  
STAMOULIS & WEINBLATT LLC  
Stamatios Stamoulis (No. 4606)  
800 N. West Street  
Third Floor  
Wilmington, Delaware 19801  
Telephone: (302) 999-1540  
Facsimile: (302) 762-1688

By: /s/ Derek C. Abbott  
Derek C. Abbott (No. 3376)  
Andrew R. Remming (No. 5120)  
Eric W. Moats (No. 6441)  
Morris, Nichols, Arsht & Tunnell LLP  
1201 North Market Street, 16th Floor  
P.O. Box 1347  
Wilmington, DE 19899-1347  
Telephone: (302) 658-9200  
Email: dabbott@mnat.com  
aremming@mnat.com  
emoats@mnat.com

O'MELVENY & MYERS LLP  
Tancred Schiavoni (*pro hac vice*)  
Janine Panchok-Berry (*pro hac vice*)  
Times Square Tower  
7 Times Square  
New York, New York 10036-6537  
Telephone: (212) 326-2000  
Facsimile: (212) 326-2061

-and-

Jessica C. K. Boelter  
SIDLEY AUSTIN LLP  
787 Seventh Avenue  
New York, New York 10019  
Telephone: (212) 839-5300  
Email: jboelter@sidley.com

-and-

*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")*

Thomas A. Labuda  
Michael C. Andolina

Matthew E. Linder  
SIDLEY AUSTIN LLP  
One South Dearborn Street  
Chicago, Illinois 60603  
Telephone: (312) 853-7000  
Email: tlabuda@sidley.com  
mandolina@sidley.com  
mlinder@sidley.com

*Attorneys for the Boy Scouts of America  
and Delaware BSA, LLC*

By: /s/ Kevin S. Mann  
Christopher P. Simon (No. 3697)  
Kevin S. Mann (No. 4576)  
CROSS & SIMON LLC  
1105 North Market Street, Suite 901  
Wilmington, DE 19801  
Telephone: (302)777-4200  
Email: csimon@crosslaw.com

-and-

James W. Ducayet  
Robert N. Hochman  
SIDLEY AUSTIN LLP  
One South Dearborn Street  
Chicago, Illinois 60603  
Telephone: (312) 853-7000  
Email: jducayet@sidley.com  
rhochman@sidley.com

*Attorneys for Sidley Austin LLP*

SO ORDERED.

Date: \_\_\_\_\_, 2020

\_\_\_\_\_  
United States District Court Judge