

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

In re:	Chapter 11
BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC, ¹	Case No. 20-10343 (LSS)
Debtors.	Jointly Administered
HARTFORD ACCIDENT AND INDEMNITY COMPANY AND FIRST STATE INSURANCE COMPANY	Adv. Pro. No. 20-50601 (LSS)
Plaintiffs,	
vs.	
BOY SCOUTS OF AMERICA, <i>et al.</i>	
Defendants.	

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

Undersigned counsel to defendants Allianz Global Risks US Insurance Company ("Allianz") and National Surety Corporation ("NSC"; and, together with Allianz, the "Allianz Insurer Defendants") hereby certifies as follows:

1. On May 15, 2020, Hartford Accident and Indemnity Company and First State Insurance Company (collectively, the "Plaintiffs") commenced the above-captioned adversary proceeding by filing a *Complaint* [D.I. 1] (the "Complaint") against, among others, the Allianz Insurer Defendants.

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: Boy Scouts of America (6300) and Delaware BSA, LLC (4311). The Debtors' mailing address is 1325 West Walnut Lane, Irving, Texas 75038.

2. On July 23, 2020, the Complaint and *Summons and Notice of Pretrial Conference* [D.I. 4, 5] were served on the Allianz Insurer Defendants.

3. On August 8, 2020, the Allianz Insurer Defendants filed the *Certification of Counsel Regarding Order Approving Stipulation for Extension of Time* [D.I. 14], seeking approval of a stipulation between the Plaintiffs and Allianz Insurer Defendants extending the Allianz Insurer Defendants' deadline to answer, move, or respond to the Complaint to and including September 15, 2020.

4. On August 16, 2020, the Court entered the *Order Approving Stipulation for Extension of Time* [D.I. 23].

5. Thereafter, on September 14, 2020, the Allianz Insurer Defendants filed the *Certification of Counsel Regarding Order Approving Stipulation for Second Extension of Time* [D.I. 47], seeking approval of a stipulation between the Plaintiffs and Allianz Insurer Defendants extending the Allianz Insurer Defendants' deadline to answer, move, or respond to the Complaint to and including October 7, 2020.

6. On September 15, 2020, the Court entered the *Order Approving Stipulation for Second Extension of Time* [D.I. 48].

7. The Plaintiffs have agreed to a third extension of the time within which the Allianz Insurer Defendants must answer, move, or otherwise respond to the Complaint to and including November 2, 2020, all as set forth in that certain *Stipulation for Third Extension of Time* (the "Stipulation") by and among the Plaintiffs and the Allianz Insurer Defendants.

8. Accordingly, the Allianz Insurer Defendants respectfully request that the Court enter the Order attached hereto as **Exhibit A**, approving the Stipulation appended to the Order as **Schedule 1**, at its earliest convenience.

Dated: October 6, 2020
Wilmington, Delaware

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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, ¹ <p style="text-align: right;">Debtors.</p>	Chapter 11 Case No. 20-10343 (LSS) Jointly Administered
HARTFORD ACCIDENT AND INDEMNITY COMPANY AND FIRST STATE INSURANCE COMPANY Plaintiffs, vs. BOY SCOUTS OF AMERICA, <i>et al.</i> Defendants.	Adv. Pro. No. 20-50601 (LSS) Re: D.I. _____

ORDER APPROVING STIPULATION FOR THIRD EXTENSION OF TIME

THE COURT having considered the *Stipulation for Third Extension of Time* (the "**Stipulation**"),² attached hereto as **Schedule 1**, by and among (i) the above-captioned plaintiffs (the "**Plaintiffs**"), (ii) defendant Allianz Global Risks US Insurance Company ("**Allianz**"), and (iii) defendant National Surety Corporation ("**NSC**"; and, together with Allianz, the "**Allianz Insurer Defendants**"); and the Court having determined that good and adequate cause exists for the approval of the Stipulation and extension of time granted herein, pursuant to FED. R. BANKR. P. 9006(b)(1) and Del. Bankr. L.R. 7012-2; and the Court having determined that no other or further notice of the Stipulation need be given,

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: Boy Scouts of America (6300) and Delaware BSA, LLC (4311). The Debtors' mailing address is 1325 West Walnut Lane, Irving, Texas 75038.

² Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Stipulation.

IT IS HEREBY ORDERED THAT:

1. The Stipulation is APPROVED.
2. The time within which each of the Allianz Insurer Defendants must answer, move, or otherwise respond to the *Complaint* (Docket No. 1) shall be, and hereby is, extended to and including November 2, 2020.
3. The relief granted herein is without prejudice to the Parties' rights to seek or oppose additional extensions of time.
4. This Order shall be effective immediately upon entry on the docket.
5. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

SCHEDULE 1

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

In re: BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC, ¹ Debtors.	Chapter 11 Case No. 20-10343 (LSS) Jointly Administered
HARTFORD ACCIDENT AND INDEMNITY COMPANY AND FIRST STATE INSURANCE COMPANY Plaintiffs, vs. BOY SCOUTS OF AMERICA, <i>et al.</i> Defendants.	Adv. Pro. No. 20-50601 (LSS)

STIPULATION FOR THIRD EXTENSION OF TIME

This stipulation and agreement (this "Stipulation") for a third extension of time is entered into by and among (i) the above-captioned plaintiffs (collectively, the "Plaintiffs"), (ii) defendant Allianz Global Risks US Insurance Company ("Allianz"), and (iii) defendant National Surety Corporation ("NSC"; and, together with Allianz, the "Allianz Insurer Defendants"). The Plaintiffs and the Allianz Insurer Defendants are collectively referred to herein as the "Parties."

R E C I T A L S:

WHEREAS, on May 15, 2020, the Plaintiffs commenced the above-captioned adversary proceeding by filing a *Complaint* [D.I. 1] (the "Complaint") against, among others, the Allianz Insurer Defendants;

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: Boy Scouts of America (6300) and Delaware BSA, LLC (4311). The Debtors' mailing address is 1325 West Walnut Lane, Irving, Texas 75038.

WHEREAS, a *Summons and Notice of Pretrial Conference* [D.I. 4] was issued with respect to NSC on July 10, 2020, thereby establishing August 10, 2020 as the date by which NSC is required to answer, move, or otherwise respond to the Complaint;

WHEREAS, a *Summons and Notice of Pretrial Conference* [D.I. 5] was issued with respect to Allianz on July 16, 2020, thereby establishing August 17, 2020 as the date by which Allianz is required to answer, move, or otherwise respond to the Complaint;

WHEREAS, the Parties entered into the *Stipulation for Extension of Time*, as approved by the *Order Approving Stipulation for Extension of Time* [D.I. 23], extending the Allianz Insurer Defendants' deadline to answer, move, or otherwise respond to the Complaint to and including September 15, 2020;

WHEREAS, the Parties entered into the *Stipulation for Second Extension of Time*, as approved by the *Order Approving Stipulation for Second Extension of Time* [D.I. 48], extending the Allianz Insurer Defendants' deadline to answer, move, or otherwise respond to the Complaint to and including October 7, 2020;

WHEREAS, the Allianz Insurer Defendants have requested that their deadline to answer, move, or otherwise respond to the Complaint be further extended to and including November 2, 2020;

WHEREAS, the Plaintiffs have consented to such an extension; and

WHEREAS, the Parties acknowledge that the Court must approve any such extension of time.

NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT IS HEREBY STIPULATED AND AGREED, BY AND AMONG THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER, THAT:

1. The time within which each of the Allianz Insurer Defendants must answer, move, or otherwise respond to the Complaint is extended to and including November 2, 2020.
2. This Stipulation is without prejudice to any application for, opposition to, or stipulation for, further extensions.

[Signature Pages Follow]

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