

**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.

Chapter 11

Case No. 20-10343 (LSS)

Jointly Administered

**Hearing Date: Oct. 14, 2020 at 10:00 a.m. (ET)**

**Objection Deadline: Oct. 7, 2020 at 4:00 p.m. (ET)**

**Re: D.I. 1379 & 1421**

**CAPITOL AREA COUNCIL'S JOINDER TO CIRCLE TEN COUNCIL'S OBJECTION  
TO THE OFFICIAL TORT CLAIMANTS' COMMITTEE'S MOTION FOR AN ORDER  
AUTHORIZING THE ISSUANCE OF SUBPOENAS FOR DISCOVERY FROM  
DEBTORS AND CERTAIN LOCAL COUNCILS PURSUANT  
TO BANKRUPTCY RULE 2004 AND LOCAL RULE 2004-1**

Capitol Area Council ("CAC"), by and through its undersigned counsel, hereby submits this *Joinder to Circle Ten Council's Objection to The Official Tort Claimants' Committee's Motion for an Order Authorizing the Issuance of Subpoenas for Discovery From Debtors and Certain Local Councils Pursuant to Bankruptcy Rule 2004 and Local Rule 2004-1* (the "Joinder"), and respectfully states as follows:

1. CAC is a nonprofit organization formed in 1912 and provides support and training to the programs of the Boy Scouts of America operating within Central Texas. Over time, CAC has grown to support Scouting programs in fifteen Central Texas counties including Bastrop, Blanco, Burnet, Caldwell, DeWitt, Fayette, Gillespie, Gonzalez, Hays, Lavaca, Lee, Llano, Mason, Travis and Williamson.

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

2. CAC is among the Additional Local Councils<sup>2</sup> from which the TCC seeks authority to compel discovery pursuant to the Rule 2004 Motion.

3. CAC objects to the Rule 2004 Motion, and adopts the factual averments and objections set forth in the Objection to the Rule 2004 Motion filed by Circle Ten Council [D.I. 1421] (the “Circle Ten Objection”), to the extent they are applicable to CAC.

4. CAC expressly reserves the right to supplement or amend this Joinder.

WHEREFORE, for the reasons set forth in the Circle Ten Objection, Capitol Area Council respectfully requests the Rule 2004 Motion be denied, and for such other and further relief as the Court deems just and equitable.

Dated: October 7, 2020  
Wilmington, Delaware

**ASHBY & GEDDES, P.A.**

/s/ William P. Bowden  
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*Counsel for Capitol Area Council*

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<sup>2</sup> Capitalized terms not otherwise defined herein have the meaning given them in the *Motion of the Official Tort Claimants’ Committee Pursuant to Bankruptcy Rule 2004 and Local Rule 2004-1 for an Order Authorizing the Issuance of Subpoenas for Discovery from Debtors and Certain Local Councils* [D.I. 1379] (the “Rule 2004 Motion”).

**CERTIFICATE OF SERVICE**

I, William P. Bowden, hereby certify that on October 7, 2020, I caused one copy of the foregoing to be served upon (1) all parties of record via CM/ECF and (2) to the parties on the attached service list via electronic mail.

Dated: October 7, 2020

/s/ William P. Bowden

William P. Bowden (DE Bar No. 2553)

**SERVICE LIST**

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