

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

In re:

BOY SCOUTS OF AMERICA AND
DELAWARE BSA, LLC,

Debtors.

Chapter 11

Case No. 20-10343 (LSS)
Jointly Administered

Related Doc. No.: 1379

**Hearing Date: October 14, 2020 at
10:00 a.m. E.T.**

**LIMITED OBJECTION AND RESERVATION OF RIGHTS OF BAY-LAKES
COUNCIL TO 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**

Bay-Lakes Council ("Bay-Lakes") by its undersigned counsel, submits this Limited Objection and Reservation of Rights to approval of 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* [Dkt. No. 1379] (the "Motion"), which is scheduled for a hearing on October 14, 2020 at 10:00 A.M. prevailing Eastern Time, and in support of its Limited Objection, states as follows:

1. Bay-Lakes is a local council of the Boy Scouts of America ("BSA") based in Appleton, Wisconsin and providing programs and services to youth in East Central Wisconsin to the Upper Peninsula of Michigan.

2. In the Motion, the Official Tort Claimants' Committee ("The TCC") seeks authority to issue a subpoena to and direct discovery from Bay-Lakes, as one of the 47 "Additional Local Councils."¹

3. Bay-Lakes files this Limited Objection to reserve its rights to object to any subpoena or other discovery issued to it by The TCC, including on the basis that it is outside the scope of Rule 2004.

WHEREFORE, Bay-Lakes Council requests that in the event the Court grants the Motion, that it be subject to this reservation of rights.

Dated: October 7, 2020

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Attorneys for Bay-Lakes Council

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

CERTIFICATE OF SERVICE

A true and correct copy of the above and forgoing document was served pursuant to the *Notice of 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* [Dkt. No. 1379-1] on all parties receiving notice ECF electronic service and by email on:

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