

**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**

**[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.

<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 30, 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.



---

LAURIE SELBER SILVERSTEIN  
UNITED STATES BANKRUPTCY JUDGE

Dated: October 13, 2020  
**Wilmington, Delaware**

**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 Plaintiffs Complaint in the above captioned adversary proceeding shall be extended up to and

[remainder of page intentionally blank]

<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.

including October 30, 2020.

Respectfully Submitted,

Dated: October 6, 2020

FINEMAN KREKSTEIN & HARRIS PC

By: /s/ Deirdre M. Richards  
Deirdre M. Richards (#4191)  
1300 N. King Street  
Wilmington, DE 19801  
Tel: (302) 538-8331  
Fax: (302) 394-9228  
E-mail: [drichards@finemanlawfirm.com](mailto:drichards@finemanlawfirm.com)

And

Susan N.K. Gummow (Admitted Pro Hac Vice)  
Ronald D. Puhala (Admitted Pro Hac Vice)  
Igor Shleypak (Admitted Pro Hac Vice)  
FORAN GLENNON PALANDECH PONZI & RUDLOFF P.C.  
222 N. LaSalle St., Suite 1400  
Chicago, IL 60601  
Tel: (312) 863-5000  
Fax: (312) 863-5009  
E-mail: [sgummow@fgppr.com](mailto:sgummow@fgppr.com)  
[rpuhala@fgppr.com](mailto:rpuhala@fgppr.com)  
[ishleypak@fgppr.com](mailto:ishleypak@fgppr.com)

*Attorneys for National Union Fire Insurance  
Company of Pittsburgh PA, Lexington Insurance  
Company, Landmark Insurance Company and The  
Insurance Company of the State of Pennsylvania*

And with permission from:

BAYARD, P.A.

By: /s/ Erin R. Fay  
Erin R. Fay (No. 5268)  
Gregory J. Flasser (No. 6154)  
600 North King Street, Suite 400  
Wilmington, Delaware 19801  
Telephone: (302) 655-5000  
Facsimile: (302) 658-6395

Email: efay@bayardlaw.com  
gflasser@bayardlaw.com

- and -

James P. Ruggeri (*admitted pro hac vice*)  
Joshua D. Weinberg (*admitted pro hac vice*)  
Abigail W. Williams (*admitted pro hac vice*)  
Shipman & Goodwin LLP  
1875 K Street, NW, Suite 600  
Washington, DC 20003  
Tel: (202) 469-7750  
Fax: (202) 469-7751

- and -

Eric S. Goldstein (*admitted pro hac vice*)  
Shipman & Goodwin LLP  
One Constitution Plaza  
Hartford, CT 06103  
Tel: (860) 251-5000  
Fax: (860) 251-5099

*Attorneys for First State Insurance Company and  
Hartford Accident and Indemnity Company*