

**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)
BOY SCOUTS OF AMERICA, Plaintiff, v. A.A., <i>et al.</i> , ² Defendants.	Adv. Pro. No. 20-50527 (LSS)

NOTICE OF **SECOND AMENDED³ AGENDA OF MATTERS SCHEDULED FOR
HEARING ON OCTOBER 14, 2020, AT 10:00 A.M. (ET)**

¹ The Debtors in the 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 Hill Lane, Irving, Texas 75038.

² A full list of the Defendants in this adversary proceeding is included in redacted form on Exhibit A to the BSA's Verified Complaint for Injunctive Relief [A.D.I 14-1] to protect the privacy interests of abuse victims.

³ **Amended items appear in bold.**

This hearing will be held telephonically and by video. All parties wishing to appear must do so telephonically by contacting COURTCALL, LLC at 866-582-6878 no later than October 14 at 8:30 a.m. to sign up. Additionally, anyone wishing to appear by Zoom is invited to use the link below. All parties that will be arguing or testifying must appear by Zoom and CourtCall. Participants on CourtCall should dial into the call not later than 10 minutes prior to the start of the scheduled hearing to insure a proper connection.

PLEASE NOTE THAT THE MICROPHONES ON THE ZOOM MEETING WILL BE MUTED AND THE ONLY AUDIO WILL BE THROUGH COURTCALL

Topic: Boy Scouts of America 20-10343
Time: October 14, 2020 10:00 AM Eastern Time (US and Canada)

Join ZoomGov Meeting
<https://debuscourts.zoomgov.com/j/1607959877>

Meeting ID: 160 795 9877
Passcode: 584382

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RESOLVED MATTER

1. Debtors' Second Motion for Entry of an Order, Under 28 U.S.C. § 1452 and Fed. R. Bankr. P. 9006(b) and 9027, Extending the Period Within Which the Debtors May Remove Civil Actions and Granting Related Relief ([D.I. 1316](#), Filed 9/14/20).

Objection Deadline: September 28, 2020, at 4:00 p.m. (ET).

Responses Received: None.

Related Pleadings:

- a) Certificate of No Objection Regarding the Debtors' Second Motion for Entry of an Order, Under 28 U.S.C. § 1452 and Fed. R. Bankr. P. 9006(b) and 9027, Extending the Period Within Which the Debtors May Remove Civil Actions and Granting Related Relief ([D.I. 1377](#), Filed 9/29/20); and

- b) Second Order, Under 28 U.S.C. § 1452 and Fed. R. Bankr. P. 9006(b) and 9027, Extending the Period Within Which the Debtors May Remove Civil Actions and Granting Related Relief ([D.I. 1393](#), Entered 10/1/20).

Status: An order has been entered. No hearing is necessary.

MATTER UNDER CERTIFICATION

- 2. Motion for Relief from the Automatic Stay of Margaret Henderson, as Personal Representative of the Estate of N.G.H., Deceased ([D.I. 1104](#), Filed 8/14/20).

Objection Deadline: September 2, 2020, at 4:00 p.m. (ET).

Responses Received:

- a) The Future Claimants' Representative's Objections to Motions for Relief from the Automatic Stay Brought by Marco Romero, Jr. and Audrey Romero, Margaret Henderson, as Personal Representative of the Estate Of N.G.H., Deceased, and Debtors with Respect to Lianfen Qian ([D.I. 1221](#), Filed 9/2/20);
- b) The Official Committee of Tort Claimants' Omnibus Objection to: (1) Motion for Relief from the Automatic Stay of Margaret Henderson, as Personal Representative of the Estate of N.G.H. Deceased [Docket No. 1104]; (2) Motion of Marco Romero Jr. and Audrey Romero for an Order for Relief from the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code [Docket No. 1120] ([D.I. 1237](#), Filed 9/2/20); and
- c) Debtors' (A) Response in Support of the Henderson and Romero Motions for Relief From the Automatic Stay and (B) Reply in Further Support of the Motion of the Debtors for Entry of an Order (I) Approving Settlement of Claim of Lianfen Qian and (II) Lifting the Automatic Stay, to the Extent Necessary, to Permit Payment of Settlement Amount by Applicable Insurance ([D.I. 1245](#), Filed 09/04/20).

Related Pleadings:

- a) Re-Notice of Motion for Relief from the Automatic Stay of Margaret Henderson, as personal Representative of the Estate of N.G.H., Deceased ([D.I. 1247](#), Filed 9/4/20);
- b) Certification of Counsel Regarding the Motion for Relief from the Automatic Stay of Margaret Henderson, as Personal Representative of the Estate of N.G.H., Deceased ([D.I. 1416](#), Filed 10/6/20); and

- c) Order Granting Motion for Relief from the Automatic Stay of Margaret Henderson, Personal Representative of the Estate of N.G.H. ([D.I. 1468](#), Filed 10/9/20).

Status: An order has been entered. No hearing is necessary.

- 3. Debtors' Second Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Certain Executory Contracts and (II) Granting Related Relief ([D.I. 1389](#), Filed 9/30/20).

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

Responses Received: None.

Related Pleadings:

- a) Certificate of No Objection Regarding the Debtors' Second Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Certain Executory Contracts and (II) Granting Related Relief ([D.I. 1448](#), Filed 10/8/20); **and**
- b) **Second Omnibus Order (I) Authorizing the Debtors to Reject Certain Executory Contracts and (II) Granting Related Relief ([D.I. 1492](#), Entered 10/12/20).**

Status: **An order has been entered. No hearing is necessary.**

ADJOURNED MATTER

- 4. Motion of Official Committee of Tort Claimants Enforcing Automatic Stay Under 11 U.S.C. §§ 362(a)(3) and 541(a) Against Middle Tennessee Council Arising from Transfers of Property of the Estate ([D.I. 1084](#), Filed 8/7/20).

Objection Deadline: September 30, 2020, at 4:00 p.m. (ET). Extended to November 4, 2020, at 4:00 p.m. (ET).

Responses Received: None.

Related Pleadings:

- a) Re-Notice of Motion of Official Committee of Tort Claimants Enforcing Automatic Stay Under 11 U.S.C. §§ 362(a)(3) and 541(a) Against Middle Tennessee Council Arising from Transfers of Property of the Estate ([D.I. 1140](#), Filed 8/24/20); **and**
- b) Re-Notice of Motion of Official Committee of Tort Claimants Enforcing Automatic Stay Under 11 U.S.C. §§ 362(a)(3) and 541(a) Against Middle

Tennessee Council Arising from Transfers of Property of the Estate ([D.I. 1408](#), Filed 10/5/20).

Status: This is adjourned to the hearing scheduled for November 18, 2020, at 10:00 a.m. (ET).

MATTERS GOING FORWARD

5. Motion of the Coalition of Abused Scouts for Justice for an Order (I) Authorizing the Coalition to File Under Seal Exhibit A to the Amended 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement ([D.I. 1144](#), Filed 8/24/20).

Objection Deadline: September 2, 2020, at 4:00 p.m. (ET). Extended to September 7, 2020 at 4:00 p.m. (ET) for the Debtors.

Responses Received:

- a) Objection to Motion of the Coalition of Abused Scouts for Justice for an Order (I) Authorizing the Coalition to File Under Seal Exhibit A to the Amended 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement ([D.I. 1219](#), Filed 9/2/20);
- b) [SEALED] Opposition to the Motion of the Coalition of Abused Scouts for Justice for an Order (I) Authorizing the Coalition to File Under Seal Exhibit A to the Amended 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement (D.I. 1220, Filed 9/2/20);
- c) United States Trustee's Objection to Motion of the Coalition of Abused Scouts for Justice for an Order (I) Authorizing the Coalition to File Under Seal Exhibit A to the Amended 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement (D.E. 1144) ([D.I. 1223](#), Filed 9/2/20);
- d) Objection of Allianz Global Risks US Insurance Company and National Surety Corporation to Motions of the Coalition of Abused Scouts for Justice (A) for an Order (I) Authorizing the Coalition to File Under Seal Exhibit A to the Amended 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement; and (B) To Participate in Mediation ([D.I. 1224](#), Filed 9/2/20);
- e) [SEALED] Objection of the Tort Claimants' Committee to Motion of the Coalition of Abused Scouts for Justice for an Order (I) Authorizing the Coalition to File Under Seal Exhibit A to the Amended 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement (D.I. 1227, Filed 9/2/20);

- f) [REDACTED] Objection of the Tort Claimants' Committee to Motion of the Coalition Of Abused Scouts for Justice for an Order (I) Authorizing the Coalition to File Under Seal Exhibit A to the Amended 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement ([D.I. 1228](#), Filed 9/2/20);
- g) Opposition to the Motion of the Coalition of Abused Scouts For Justice For an Order (I) Authorizing the Coalition to File Under Seal Exhibit A to the Amended 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement [REDACTED] ([D.I. 1248](#), Filed 9/4/20);
- h) Century's Joinder in the Objection of the United States Trustee (D.I. 1223) to the Motion of the Entity Calling Itself the "Coalition" Filing Under Seal All the Exhibits to Its Motion and Amended 2019 Statement (D.I. 1144) (D.I. [1261](#), Filed 9/4/20);
- i) Debtors' Motion for Leave to File Debtors' Omnibus Response to the Motions of the Coalition of Abused Scouts for Justice (A) for an Order (I) Authorizing the Coalition to File Under Seal Exhibit A to the Amend 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement and (B) to Participate in the Mediation ([D.I. 1269](#), Filed 9/8/20); and
- j) Objection of the Coalition of Abused Scouts for Justice to Century's Motion to Compel the Depositions of Timothy Kosnoff and Andrew Van Arsdale or in the Alternative to Adjourn the Hearing on the Pending 2019 Motions [D.I. 1144], [D.I. 1161], and [D.I. 1164] ([D.I. 1445](#), Filed 10/7/20).

Related Pleadings:

- a) [SEALED] Exhibit A to the Amended Verified Statement of Coalition of Abused Scouts for Justice Pursuant to Bankruptcy Rule 2019 (D.I. 1143, Filed 8/24/20);
- b) Amended Notice of Motion of the Coalition of Abused Scouts for Justice for an Order (I) Authorizing the Coalition to File Under Seal Exhibit A to the Amended 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement ([D.I. 1150](#), Filed 8/25/20);
- c) Omnibus Reply of the Coalition of Abused Scouts for Justice to Objections to (A) Motion for an Order (I) Authorizing the Coalition to File Under Seal Exhibit A to the Amended 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement, and (B) Motion of the Coalition to Participate in the Mediation ([D.I. 1257](#), Filed 9/4/20);

- d) Motion of the Coalition of Abused Scouts for Justice for Leave to File Omnibus Reply of the Coalition of Abused Scouts for Justice to Objections to (A) Motion for an Order (I) Authorizing the Coalition to File Under Seal Exhibit A to the Amended 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement, and (B) Motion of the Coalition to Participate in the Mediation ([D.I. 1259](#), Filed 9/4/20);
- e) Notice of Filing of Further Revised Proposed Order (I) Authorizing the Coalition to File Under Seal Exhibit A to the Amended 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement ([D.I. 1291](#), Filed 9/9/20);
- f) Letter from Tancred Schiavoni Regarding Motion of Coalition to File Under Seal ([D.I. 1320](#); File 9/15/20);
- g) Letter from James E. O'Neill, Esq. to Judge Laurie Selber Silverstein Regarding Proposed Order Granting in Part and Denying in Part Motion for an Order to File Under Seal Exhibit A to the Amended 2019 Statement ([D.I. 1321](#); Filed 9/25/20)
- h) Letter from Rachel B. Mersky, Esquire to Judge Laurie Selber Silverstein Regarding Order on Motion for An Order Authorizing the Coalition to File Under Seal Exhibit A to the Amended 2019 Statement ([D.I. 1323](#), Filed 9/15/20);
- i) Letter from Bruce W. McCullough, Esq. to Hon. Laurie Selber Silverstein Joining Century Indemnity Company's Letter Regarding Motion of Coalition to File Under Seal ([D.I. 1365](#), Filed 9/23/20);
- j) Supplemental Brief of the Coalition of Abused Scouts for Justice in Support of (A) Motion for an Order Approving the Sufficiency of the Amended 2019 Statement, and (B) Motion of The Coalition to Participate in the Mediation ([D.I. 1432](#), Filed 10/7/20); and
- k) Order Granting In Part and Continuing In Part Motion of the Coalition of Abused Scouts for Justice For (I) An Order Authorizing the Coalition to File Under Seal Exhibit A to the Amended 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement ([D.I. 1435](#), Entered 10/7/20).

Status: An order has been entered granting in part and continuing in part this matter. This matter is going forward.

- 6. Motion for Relief from the Automatic Stay of Salvador Contreras Rivera and Kasandra Lopez Ramirez ([D.I. 1153](#), Filed 8/26/20).

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

Responses Received: None.

Related Pleadings:

- a) Certification of No Objection Regarding Motion for Relief from Stay ([D.I. 1458](#), Filed 10/9/20); **and**
- b) **Order Granting Motion for Relief from the Automatic Stay of Salvador Contreras Rivera and Kasandra Lopez Ramirez ([D.I. 1493](#), Entered 10/12/20).**

Status: **An order has been entered. No hearing is necessary.**

- 7. Motion of the Coalition of Abused Scouts for Justice to Participate in The Mediation ([D.I. 1161](#), Filed 8/26/20).

Objection Deadline: September 2, 2020, at 4:00 p.m. (ET). Extended to September 7, 2020 at 4:00 p.m. (ET) for the Debtors.

Responses Received:

- a) Objection of Hartford Accident and Indemnity Company, First State Insurance Company and Twin City Fire Insurance Company to Motion of the Coalition of Abused Scouts for Justice to Participate in the Mediation ([D.I. 1222](#), Filed 9/2/20);
- b) Objection of Allianz Global Risks US Insurance Company and National Surety Corporation to Motions of the Coalition of Abused Scouts for Justice (A) for an Order (I) Authorizing the Coalition to File Under Seal Exhibit A to the Amended 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement; and (B) To Participate in Mediation ([D.I. 1224](#), Filed 9/2/20);
- c) [SEALED] Objection of the Tort Claimants' Committee to Motion of the Coalition of Abused Scouts for Justice to Participate in the Mediation (D.I. 1229, Filed 9/2/20);
- d) Objection of Century and Other Listed Insurers to the Motion Filed by the Entity Calling Itself the Coalition of Abused Scouts for Justice to Participate in the Mediation ([D.I. 1230](#), Filed 9/2/20);
- e) [REDACTED] Objection of the Tort Claimants' Committee to Motion of the Coalition of Abused Scouts for Justice to Participate in the Mediation ([D.I. 1231](#), Filed 9/2/20);

- f) Debtors' Motion for Leave to File Debtors' Omnibus Response to the Motions of the Coalition of Abused Scouts for Justice (A) for an Order (I) Authorizing the Coalition to File Under Seal Exhibit A to the Amend 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement and (B) to Participate in the Mediation ([D.I. 1269](#), Filed 9/8/20); **and**

- g) **Court-Appointed Mediators Statement Related to Motions of the Coalition of Abused Scouts for Justice (A) for an Order (I) Authorizing the Coalition to File Under Seal Exhibit A to the Amended 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement and (B) to Participate in the Mediation ([D.I. 1500](#), Filed 10/13/20).**

Related Pleadings:

- a) Omnibus Reply of the Coalition of Abused Scouts for Justice to Objections to (A) Motion for an Order (I) Authorizing the Coalition to File Under Seal Exhibit A to the Amended 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement, and (B) Motion of the Coalition to Participate in the Mediation ([D.I. 1257](#), Filed 9/4/20);

- b) Motion of the Coalition of Abused Scouts for Justice for Leave to File Omnibus Reply of the Coalition of Abused Scouts for Justice to Objections to (A) Motion for an Order (I) Authorizing the Coalition to File Under Seal Exhibit A to the Amended 2019 Statement and (II) Approving the Sufficiency of the Amended 2019 Statement, and (B) Motion of the Coalition to Participate in the Mediation ([D.I. 1259](#), Filed 9/4/20);

- c) Re-Notice of Motion of the Coalition for Abused Scouts for Justice to Participate in Mediation ([D.I. 1383](#), Filed 9/30/20); and

- d) Supplemental Brief of the Coalition of Abused Scouts for Justice in Support of (A) Motion for an Order Approving the Sufficiency of the Amended 2019 Statement, and (B) Motion of The Coalition to Participate in the Mediation ([D.I. 1432](#), Filed 10/7/20).

Status: This matter is going forward.

- 8. Century and Hartford's Motion to Compel the Attorneys Representing the Entity Calling Itself the "Coalition" to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 1164](#), Filed 8/26/20).

Objection Deadline: September 2, 2020, at 4:00 p.m. (ET).

Responses Received:

- a) Joinder by Allianz Global Risks US Insurance Company and National Surety Corporation to Century and Hartford's Motion to Compel the Attorneys Representing the Entity Calling Itself the "Coalition" to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 1177](#), Filed 8/27/20);
- b) Joinder by Agricultural Insurance Company to Century and Hartford's Motion to Compel the Attorneys Representing the Entity Calling Itself the "Coalition" to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 1218](#), Filed 9/2/20);
- c) Objection of the Coalition of Abused Scouts for Justice to Century to Hartford's Motion to Compel the Attorneys Representing the Entity Calling Itself the "Coalition" to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 1225](#), Filed 9/2/20); and
- d) Joinder by Agricultural Insurance Company to Century's Objection to the Coalition's Motion for Order Permitting Filing of Proof of Claim Forms Signed by Authorized Counsel in Accordance with Bankruptcy Code Sections 501 and 502, Bankruptcy Rule 3001, and Official Form 410 (D.I. 1487, Filed 10/12/20).

Related Pleadings:

- a) Verified Statement of Coalition of Abused Scouts for Justice Pursuant to Bankruptcy Rule 2019 ([D.I. 1053](#), Filed 7/29/20);
- b) Amended Verified Statement of Coalition of Abused Scouts for Justice Pursuant to Bankruptcy Rule 2019 ([D.I. 1106](#), Filed 8/14/20);
- c) Declaration of Janine Panchok-Berry in Support of Century and Hartford's Motion to Compel the Attorneys Representing the Entity Calling Itself the "Coalition" to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 1165](#), Filed 8/26/20);
- d) Exhibits to Declaration of Janine Panchok-Berry in Support of Century and Hartford's Motion to Compel the Attorneys Representing the Entity Calling Itself the "Coalition" to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 1166](#), Filed 8/26/20);
- e) Re-Notice of the Coalition for Abused Scouts for Justice Rule 2019 Verified Statement and Amended Rule 2019 Verified Statement ([D.I. 1384](#), Filed 9/30/20);

- f) [SEALED] Second Amended Verified Statement of the Coalition of Abused Scouts for Justice Pursuant to Bankruptcy Rule 2019 (D.I. 1426, Filed 10/7/20);
- g) [REDACTED] Second Amended Verified Statement of Coalition of Abused Scouts for Justice Pursuant to Bankruptcy Rule 2019 ([D.I. 1429](#), Filed 10/7/20);
- h) **Motion of Hartford Accident and Indemnity Company, First State Insurance Company, Twin City Fire Insurance Company and Century Indemnity Company for Leave to File Late Reply to Responses Regarding Century and Hartford’s Motion to Compel the Attorneys Representing the Entity Calling Itself the “Coalition” to Submit the Disclosures Required by Federal Rule Of Bankruptcy Procedure 2019 ([D.I. 1498](#), Filed 10/13/20); and**
- i) **Reply Brief Of Hartford Accident and Indemnity Company, First State Insurance Company, Twin City Fire Insurance Company and Century Indemnity Company in Support of (I) Century and Hartford’s Motion to Compel the Attorneys Representing the Entity Calling Itself the “Coalition” to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 1499](#), Filed 10/13/20).**

Status: This matter is going forward. **Professor Nancy Moore will be available for cross-examination and will be appearing from her home in Boston, Massachusetts.**

- 9. 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](#), 9/29/20).

Objection Deadline: October 7, 2020, at 4:00 p.m. (ET). Extended to October 11, 2020, at 11:59 p.m. (ET) for the Debtors and the Ad Hoc Committee of Local Councils of the Boy Scouts of America. The reply deadline for the Tort Claimants’ Committee has been extended to October, 13, 2020, at 4:00 p.m. (ET).

Responses Received:

- a) Objection of Circle Ten 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 ([D.I. 1421](#), Filed 10/7/20);
- b) 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 ([D.I. 1422](#), Filed 10/7/20);
- c) Baltimore Area Council's Objection to Tort Claimants' Committee's Rule 2004 Motion for an Order Authorizing the Issuance of a Subpoena ([D.I. 1423](#), Filed 10/7/20);
 - d) 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 ([D.I. 1425](#), Filed 10/7/20);
 - e) Response and Reservation of Rights of the Coalition of Abused Scouts for Justice Regarding Discovery Motion ([D.I. 1431](#), Filed 10/7/20);
 - f) Objection of the Greater St. Louis Area Council, Boy Scouts of America, Inc., to 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. 1434](#), Filed 10/7/20);
 - g) Objection of Daniel Webster 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 ([D.I. 1459](#), Filed 10/9/20);
 - h) Objection of Orange County Council of the Boy Scouts of America 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 ([D.I. 1462](#), Filed 10/9/20);
 - i) Objection of the Ad Hoc Committee of Local Councils to Tort Claimants' Committee's Rule 2004 Motion ([D.I. 1480](#), Filed 10/11/20);
 - j) Debtors' Motion for Leave to File Debtors' Limited Objection to 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. 1481](#), Filed 10/11/20);
 - k) Declaration of Blair M. Warner in Support of Debtors' Limited Objection to 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. 1482](#), Filed 10/11/20); and

- l) **Century's Objection to Proposed Form of Order Approving the Stipulation Regarding 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. 1495](#), Filed 10/13/20).**

Related Pleadings:

- a) Certification of Counsel Regarding Stipulation Regarding 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. 1479](#), Filed 10/11/20);
- b) **Omnibus Reply of the Official Tort Claimants' Committee to Objections of Certain Examinees to Motion of Official Tort Claimants' Committee for an Order Authorizing the Issuance of Subpoenas for Discovery from Debtors and Certain Local Councils ([D.I. 1504](#), Filed 10/13/20);**
- c) **Declaration of John W. Lucas in Support of Omnibus Reply of the Official Tort Claimants' Committee to Objections of Certain Examinees to Motion of Official Tort Claimants' Committee for an Order Authorizing the Issuance of Subpoenas for Discovery from Debtors and Certain Local Councils ([D.I. 1505](#), Filed 10/13/20); and**
- d) **Motion for Leave to File Late Omnibus Reply to Objections 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 ([D.I. 1506](#), Filed 10/13/20).**

Status: This matter is going forward.

10. The Tort Claimants' Committee's Motion to Supplement the Claims Bar Date Order Regarding the Electronic Execution of Abuse Proofs of Claim ([D.I. 1387](#), Filed 9/30/20).

Objection Deadline: October 7, 2020, at 4:00 p.m. (ET). Extended to October 10, 2020, at 12:00 p.m. (ET) for the Coalition, the Debtors, and the Ad Hoc Committee of Local Councils of the Boy Scouts of America.

Responses Received:

- a) United States Trustee's Omnibus Response to (1) the Tort Claimants' Committee's Motion to Supplement the Claims Bar Date Order Regarding the Electronic Execution of Abuse Proofs of Claim (D.E. 1387), and (2) Motion of the Coalition of Abused Scouts for Justice for Order Permitting Filing of Proof of Claim Forms Signed by Authorized Counsel in Accordance with Bankruptcy Code Sections 501 and 502, Bankruptcy Rule 3001, and Official Form. 410 (D.E. 1388) ([D.I. 1424](#), Filed 10/7/20);
- b) Joinder of the Coalition of Abused Scouts for Justice to the Tort Claimants' Committee's Motion to Supplement the Claims Bar Date Order Regarding the Electronic Execution of Abuse Proofs of Claim ([D.I. 1450](#), Filed 10/8/20);
- c) Debtors' Motion for Leave to File Debtors' Omnibus Response to (I) Motion of Coalition of Abuse Scouts for Justice for Order Permitting Filing of Proof of Claim Forms Signed by Authorized Counsel and (II) Tort Claimants' Committee's Motion to Supplement the Claims Bar Date Order Regarding the Electronic Execution of Abuse Proofs of Claim ([D.I. 1478](#), Filed 10/10/20); **and**
- d) **Century's Opposition to the Coalition's Motion for Leave to File Omnibus Reply to the Objections to Motion for Order Permitting Filing of Proof of Claim Forms Signed by Authorized Counsel ([D.I. 1494](#), Filed 10/13/20).**

Related Pleadings:

- a) **Omnibus Reply of the Coalition of Abused Scouts for Justice to Objections to Motion for Order Permitting Filing of Proof of Claim Forms Signed by Authorized Counsel in Accordance with Bankruptcy Code Sections 501 and 502, Bankruptcy Rule 3001, and Official Form 410 ([D.I. 1490](#), Filed 10/12/20);**
- b) **Motion of the Coalition of Abused Scouts for Justice for Leave to File Omnibus Reply to Objections to Motion for Order Permitting Filing of Proof of Claim Forms Signed by Authorized Counsel in Accordance with Bankruptcy Code Sections 501 and 502, Bankruptcy Rule 3001, and Official Form 410 ([D.I. 1491](#), Filed 10/12/20); and**
- c) **Corrected Omnibus Reply of the Coalition of Abused Scouts for Justice to Objections to Motion for Order Permitting Filing of Proof of Claim Forms Signed by Authorized Counsel in Accordance with Bankruptcy Code Sections 501 and 502, Bankruptcy Rule 3001, and Official Form 410 ([D.I. 1496](#), Filed 10/13/20).**

Status: This matter is going forward.

11. Motion of Coalition of Abused Scouts for Justice for Order Permitting Filing of Proof of Claim Forms Signed by Authorized Counsel in Accordance with Bankruptcy Code Sections 501 and 502, Bankruptcy Rule 3001, and Official Form 410 ([D.I. 1388](#), Filed 9/30/20).

Objection Deadline: October 7, 2020, at 4:00 p.m. (ET). Extended to October 9, 2020, at 4:00 p.m. (ET) for the Debtors, the Tort Claimants' Committee, the Ad Hoc Committee of Local Councils of the Boy Scouts of America, and certain insurers (**including Hartford and Century**). Extended to October 10, 2020, at 12:00 p.m. (ET) for the Tort Claimants' Committee and the Debtors.

Responses Received:

- a) United States Trustee's Omnibus Response to (1) the Tort Claimants' Committee's Motion to Supplement the Claims Bar Date Order Regarding the Electronic Execution of Abuse Proofs of Claim (D.E. 1387), and (2) Motion of the Coalition of Abused Scouts for Justice for Order Permitting Filing of Proof of Claim Forms Signed by Authorized Counsel in Accordance with Bankruptcy Code Sections 501 and 502, Bankruptcy Rule 3001, and Official Form. 410 (D.E. 1388) ([D.I. 1424](#), Filed 10/7/20);
- b) Hartford's Objection to the Motion of Coalition of Abused Scouts for Justice for Order Permitting Filing of Proof of Claim Forms Signed by Authorized Counsel in Accordance with Bankruptcy Code Section 501 and 502, Bankruptcy Rule 3001, and Official Form 410 ([D.I. 1460](#), Filed 10/9/20);
- c) Century's Objection to the Coalition's Motion for Order Permitting Filing of Proof of Claim Forms Signed by Authorized Counsel in Accordance with Bankruptcy Code Sections 501 and 502, Bankruptcy Rule 3001, and Official Form 410 ([D.I. 1463](#), Filed 10/9/20);
- d) Declaration of Andrew Kirschenbaum in Support of Century's Objection to the Coalition's Motion for Order Permitting Filing of Proof of Claim Forms Signed by Authorized Counsel in Accordance with Bankruptcy Code Sections 501 and 502, Bankruptcy Rule 3001, and Official Form 410 ([D.I. 1464](#), Filed 10/9/20);
- e) Objection of the Tort Claimants' Committee to Motion for Order Permitting Filing of Proof of Claim Forms Signed by Authorized Counsel in Accordance with Bankruptcy Code Sections 501 and 502, Bankruptcy Rule 3001, and Official Form 410 ([D.I. 1465](#), Filed 10/9/20);

- f) Debtors' Motion for Leave to File Debtors' Omnibus Response to (I) Motion of Coalition of Abuse Scouts for Justice for Order Permitting Filing of Proof of Claim Forms Signed by Authorized Counsel and (II) Tort Claimants' Committee's Motion to Supplement the Claims Bar Date Order Regarding the Electronic Execution of Abuse Proofs of Claim ([D.I. 1478](#), Filed 10/10/20); and
- g) **Century's Opposition to the Coalition's Motion for Leave to File Omnibus Reply to the Objections to Motion for Order Permitting Filing of Proof of Claim Forms Signed by Authorized Counsel ([D.I. 1494](#), Filed 10/13/20).**

Related Pleadings:

- a) **Omnibus Reply of the Coalition of Abused Scouts for Justice to Objections to Motion for Order Permitting Filing of Proof of Claim Forms Signed by Authorized Counsel in Accordance with Bankruptcy Code Sections 501 and 502, Bankruptcy Rule 3001, and Official Form 410 ([D.I. 1490](#), Filed 10/12/20);**
- b) **Motion of the Coalition of Abused Scouts for Justice for Leave to File Omnibus Reply to Objections to Motion for Order Permitting Filing of Proof of Claim Forms Signed by Authorized Counsel in Accordance with Bankruptcy Code Sections 501 and 502, Bankruptcy Rule 3001, and Official Form 410 ([D.I. 1491](#), Filed 10/12/20); and**
- c) **Corrected Omnibus Reply of the Coalition of Abused Scouts for Justice to Objections to Motion for Order Permitting Filing of Proof of Claim Forms Signed by Authorized Counsel in Accordance with Bankruptcy Code Sections 501 and 502, Bankruptcy Rule 3001, and Official Form 410 ([D.I. 1496](#), Filed 10/13/20).**

Status: This matter is going forward.

- 12. Century's Motion to Compel the Depositions of Timothy Kosnoff and Andrew Van Arsdale or in the Alternative to Adjourn the Hearing on the Pending 2019 Motions [D.I. 1144], [D.I. 1161], and [D.I. 1164] ([D.I. 1417](#), Filed 1/7/20).

Objection Deadline: TBD

Responses Received: See Item 13, below.

Related Pleadings:

- a) Declaration of Andrew Kirschenbaum in Support of Century's Motion to Compel the Depositions of Messrs. Kosnoff and Van Arsdale, or in the

Alternative Adjourn the Hearing on the Pending 2019 Motions [D.I. 1144], [D.I. 1161] and [D.I. 1164] ([D.I. 1418](#), Filed 10/7/20);

- b) Motion To Shorten Notice Of Century's Motion To Compel The Depositions Of Messrs. Kosnoff And Van Arsdale, Or In The Alternative Adjourn The Hearing On The Pending 2019 Motions [D.I. 1144], [D.I. 1161]and [D.I. 1164] ([D.I. 1419](#), Filed 10/7/20); **and**
- c) **Objection Of Timothy Kosnoff, Esquire And Andrew Van Arsdale, Esquire To Century's Motion To Compel ([D.I. 1501](#), Filed 10/13/20).**

Status: This matter is going forward.

13. Motion of Tim Kosnoff, Esquire for Protective Order and to Quash Notice of Deposition ([D.I. 1420](#), Filed 10/7/20).

Objection Deadline: October 13, 2020, at 4:00 p.m. (ET).

Responses Received:

- a) Century's Opposition to Motion of Tim Kosnoff, Esquire for Protective Order and to Quash Notice of Deposition ([D.I. 1461](#), Filed 10/9/20).

Related Pleadings: None.

STATUS CONFERENCE

14. Boy Scouts of America v. A.A., *et al.* (20-ap-50527).

Related Pleadings:

- a) Consent Order Pursuant to 11 U.S.C. §§ 105(a) and 362 Granting the BSA's Motion for a Preliminary Injunction ([A.D.I. 54](#), Entered 3/30/20); and
- b) Stipulation and Agreed Order By and Among the Boy Scouts of America, The Official Committee of Survivors of Abuse, and the Official Committee of Unsecured Creditors Extending the Termination Date of the Standstill Period Under the Consent Order Granting the BSA's Motion for a Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(a) and 362 ([A.D.I. 72](#), Entered 5/18/20); and
- c) Second Stipulation and Agreed Order by and Among the Boy Scouts of America, the Official Committee of Survivors of Abuse, and the Official Committee of Unsecured Creditors Modifying the Consent Order Granting the BSAs Motion for a Preliminary Injunction Pursuant to 11 U.S.C. §§

105(a) and 362 and Further Extending the Termination Date of the Standstill Period ([A.D.I. 77](#), Entered 6/9/20).

Status: This matter is going forward as a status conference.

Dated: October 13, 2020
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Eric W. Moats

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