

**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)

**Re: D.I. 1519**

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' SECOND MOTION  
FOR ENTRY OF AN ORDER EXTENDING THE DEBTORS' EXCLUSIVE PERIODS  
TO FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF**

The undersigned counsel to the above-captioned debtors and debtors in possession (the "Debtors") hereby certifies as follows:

1. On October 14, 2020, the Debtors filed the *Debtors' Second Motion for Entry of an Order Extending the Debtors' Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof* (D.I. 1519) (the "Motion").

2. The deadline to file objections to the relief requested in the Motion was October 28, 2020, at 4:00 p.m. (ET) (the "Objection Deadline").

3. Prior to the Objection Deadline, the Debtors received informal comments to the Motion from the Official Committee of Tort Claimants (the "Tort Committee") and the Coalition of Abused Scouts for Justice (the "Coalition"). Besides the informal comments from the Tort Committee and Coalition, the Debtors have received no other objection, response, or comments, and no objection or other responsive pleading to the Motion appears on the Court's docket.

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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 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.

4. The Debtors resolved the informal comments of the Tort Committee and Coalition through revisions to the proposed form of order granting the relief requested in the Motion. A copy of the revised proposed form of order is attached as **Exhibit A**.

5. For the convenience of the Court and all parties in interest, a redline comparing the revised proposed order against the form of order attached to the Motion is attached hereto as **Exhibit B**.

6. The Tort Committee and Coalition have reviewed the revised proposed order and do not object to its entry.

*[Remainder of Page Left Intentionally Blank]*

WHEREFORE, the Debtors respectfully request that the Court enter the revised proposed form of order attached as **Exhibit A**.

Dated: October 29, 2020  
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

/s/ Paige N. Topper

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*Counsel and Proposed Co-Counsel to the Debtors and  
Debtors in Possession*

**EXHIBIT A**

**Revised Proposed Order**

**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)

**Ref. Docket No. 1519**

**ORDER EXTENDING THE DEBTORS' EXCLUSIVE PERIODS TO FILE  
A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF**

Upon the motion (the "Motion")<sup>2</sup> of the Boy Scouts of America and Delaware BSA, LLC, the non-profit corporations that are debtors and debtors in possession in the above-captioned chapter 11 cases (together, the "Debtors"), for entry of an order (this "Order"), pursuant to Bankruptcy Code section 1121(d) of the Bankruptcy Code, extending the Exclusive Periods (as defined below), as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and entry of this Order extending the Exclusive Periods being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and the Debtors having consented to the entry of a final order by this Court under Article III of the United States Constitution; and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and all objections to

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<sup>2</sup> All capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Motion.

the Motion, if any, having been withdrawn, resolved or overruled; and the relief requested in the Motion being in the best interests of the Debtors' estates, their creditors and other parties in interest; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The exclusive period for the Debtors to file a chapter 11 plan (the "Exclusive Filing Period") is hereby extended by approximately 155 days, to and including March 19, 2021. The period during which the Debtors have the exclusive right to solicit acceptances thereof (the "Exclusive Solicitation Period" and, together with the Exclusive Filing Period, the "Exclusive Periods") is hereby extended by approximately 154 days, to and including May 18, 2021.
3. The entry of this Order is without prejudice to the Debtors' right to request further extensions of the Exclusive Periods.
4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: \_\_\_\_\_, 2020  
Wilmington, Delaware

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THE HON. LAURIE SELBER SILVERSTEIN  
UNITED STATES BANKRUPTCY JUDGE

**EXHIBIT B**

**Redline**

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

In re:

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Debtors.

Chapter 11

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Upon the motion (the "Motion")<sup>2</sup> of the Boy Scouts of America and Delaware BSA, LLC, the non-profit corporations that are debtors and debtors in possession in the above-captioned chapter 11 cases (together, the "Debtors"), for entry of an order (this "Order"), pursuant to Bankruptcy Code section 1121(d) of the Bankruptcy Code, extending the Exclusive Periods (as defined below), as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and entry of this Order extending the Exclusive Periods being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and the Debtors having consented to the entry of a final order by this Court under Article III of the United States Constitution; and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and all

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<sup>2</sup> All capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Motion.

objections to the Motion, if any, having been withdrawn, resolved or overruled; and the relief requested in the Motion being in the best interests of the Debtors' estates, their creditors and other parties in interest; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

2. The exclusive period for the Debtors to file a chapter 11 plan (the "Exclusive Filing Period") is hereby extended by approximately ~~180~~155 days, to and including ~~April 13~~March 19, 2021. The period during which the Debtors have the exclusive right to solicit acceptances thereof (the "Exclusive Solicitation Period" and, together with the Exclusive Filing Period, the "Exclusive Periods") is hereby extended by approximately ~~180~~154 days, to and including ~~June 14~~May 18, 2021.

3. The entry of this Order is without prejudice to the Debtors' right to request further extensions of the Exclusive Periods.

4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: \_\_\_\_\_, 2020  
Wilmington, Delaware

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THE HON. LAURIE SELBER SILVERSTEIN  
UNITED STATES BANKRUPTCY JUDGE

<b>Summary report:</b>	
<b>Litera® Change-Pro for Word 10.10.0.103 Document comparison done on 10/27/2020 11:55:00 AM</b>	
<b>Style name:</b> 2 W&C Standard Set	
<b>Intelligent Table Comparison:</b> Active	
<b>Original DMS:</b> iw://AMERICAS_DMS/AMERICAS/104580522/1	
<b>Modified DMS:</b> iw://AMERICAS_DMS/AMERICAS/104580522/2	
<b>Changes:</b>	
<u>Add</u>	11
<del>Delete</del>	11
<del>Move From</del>	0
<u>Move To</u>	0
<u>Table Insert</u>	0
<del>Table Delete</del>	0
<u>Table moves to</u>	0
<del>Table moves from</del>	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
<b>Total Changes:</b>	<b>22</b>