

**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)

Re: Dkt.

**DECLARATION OF SALVATORE COCCHIARO IN SUPPORT OF
CENTURY'S REPLY IN FURTHER SUPPORT OF MOTION TO ENFORCE
RULE 2019 AS AGAINST THE COALITION, ITS FOUNDING AND LARGEST
ALLEGED MEMBER AND MR. KOSNOFF [D.I. 5802]**

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successor to CCI Insurance Company, as
successor to Insurance Company of North
America and Indemnity Insurance Company of
North America*

I, **SALVATORE COCCHIARO**, declare as follows:

1. I am an associate at the firm O'Melveny & Myers LLP ("OMM"). I submit this declaration based on my knowledge of the proceedings in the Boy Scouts of America bankruptcy and review of the pleadings, in support of *Century's Reply in Further Support of Motion to Enforce Rule 2019 as Against the Coalition, its Founding and Largest Alleged Member and Mr. Kosnoff* [D.I. 5802].

2. Attached hereto as **Exhibit 1** is a true and correct copy of Mr. Kosnoff's Twitter posting on July 25, 2021 that is cited in footnote 5 of the brief.

3. Attached hereto as **Exhibit 2** is a true and correct copy of Mr. Kosnoff's Twitter posting on May 24, 2021 that is cited in footnote 6 of the brief.

4. Attached hereto as **Exhibit 3** is a true and correct copy of Mr. Kosnoff's Twitter posting on July 2, 2021 that is cited in footnote 9 of the brief.

5. Attached hereto as **Exhibit 4** is a true and correct copy of Mr. Kosnoff's Twitter posting on July 4, 2021 and Mr. Trani's reply that is cited in footnote 10 of the brief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28th day of July 2021 in New York, New York.

/s/ Salvatore Cocchiaro
Salvatore Cocchiaro

EXHIBIT 1



Kosnoff Law
@SexAbuseAttys



Tomorrow starts what should be a pivotal week in the BSA case. It won't be because we don't have a judge. A jellyfish. Her thing is to decide nothing. Do nothing. She hasn't ruled once. Sad! True to form she will let the case languish until BSA runs out of cash which is near.

11:35 PM · Jul 25, 2021 · Twitter for iPhone

3 Likes



EXHIBIT 2



Kosnoff Law
@SexAbuseAttys



Judge Silverstein's house is on fire. She wants to kick the can down the road once more. Honey, judges judge. Just fucking judge! On behalf of my 17000 clients, let me put it in a song.



"I Can't Go For That" - Daryl Hall, Chromeo
Live From Daryl's House www.lfdh.com
[youtube.com](https://www.youtube.com)

1:21 AM · May 24, 2021 · Twitter Web App

1 Like

EXHIBIT 3



Kosnoff Law
@SexAbuseAttys



I co-founded Abused in Scouting. We represent 16,000 survivors in this bankruptcy. Ken Rothweiler does not speak for Abused in Scouting or its clients. He is an army of one. I doubt many of our clients know who he is.



Boy Scouts of America settles for \$850 million with more than 84,000 sexual abu...
The settlement is one of the largest of its kind in a child sexual abuse case in U.S. history, but attorneys for victims called it inadequate.
[washingtonpost.com](https://www.washingtonpost.com)

7:31 PM · Jul 2, 2021 · Twitter for iPhone

1 Retweet 2 Likes

EXHIBIT 4



Kosnoff Law
@SexAbuseAttys



"I think it's a disservice to the victims to put out a media release [Ken Rothweiler not AIS] saying they've reached an agreement for \$850 million, especially the way they're taking a victory dance about it," he said. "To me, I find it just reprehensible."



Boy Scouts bankruptcy plans anger some, welcomed by oth...
By DAVID CRARY and RANDALL CHASE Associated Press
[newjerseynewsnetwork.com](https://www.newjerseynewsnetwork.com)

1:38 PM · Jul 4, 2021 · Twitter for iPhone



Matthew Trani @matthewtrani · Jul 5
Replying to @SexAbuseAttys



Clients soon to be shouting "not my lawyer" to Rothweiler and many others right about now.

Who cares about a few thousand anyway?

If you can't dismantle the BSA, the next goal is taking over company control. I want to see a voting supporter in every council across the nation.

