

**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)

Ref. Docket Nos. 2295 and 3526

Objection Deadline: May 10, 2021, 4:00 p.m.

Hearing Date: May 19, 2021, 10:00 a.m.

**JOINDER OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR THE ARCHBISHOP OF AGANA (BANKR. D. GUAM 19-00010)
TO THE OBJECTION TORT CLAIMANTS' COMMITTEE**

The Official Committee of Unsecured Creditors in the chapter 11 bankruptcy case of the Archbishop of Agana (Bankr. D. Guam 19-00010) (the "Guam Committee") submits this joinder to the Objection of the Tort Claimants' Committee to Debtors' Motion For Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms Of Ballots, (IV) Approving Form, Manner and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief (the "TCC's Objection") and respectfully states as follows:

BACKGROUND

The Guam Committee was appointed in the chapter 11 case of the Archbishop of Agana (Bankr. D. Guam 19-00010) (the "Archdiocese of Agana Bankruptcy") to represent the interests

¹ 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.

of the unsecured creditors in the Archdiocese of Agana Bankruptcy case. Among the constituents of the Guam Committee are certain Survivors of sexual abuse with claims both against the Boy Scout Debtors and the Archdiocese of Agana.

JOINDER

The Guam Committee joins in the TCC's Objection. Notably, and as more fully set forth in the TCC's Objection, the Boy Scouts Disclosure Statement and Plan unlawfully impair the rights of the Survivors of child sexual abuse who hold claims in the Archdiocese of Agana Bankruptcy. The attempts by the Boy Scouts and their insurers to dispose of property of the Archdiocese of Agana's bankruptcy estate violates the automatic stay in the Archdiocese of Agana Bankruptcy case. *See* TCC Objection ¶ 53.

The Guam Committee reserves all rights with respect to the foregoing, including the right to raise additional objections to any future Plan or to any amendments to the Disclosure Statement.

CONCLUSION

WHEREFORE, the Guam Committee respectfully requests that the Court sustain the TCC's Objection consistent with the foregoing.

Dated: May 17, 2021
Wilmington, Delaware

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 17, 2021, I caused copies of the foregoing JOINDER OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE ARCHBISHOP OF AGANA (BANKR. D. GUAM 19-00010) TO THE OBJECTION TORT CLAIMANTS' COMMITTEE to be served via first-class mail, postage prepaid, upon the parties listed on the attached matrix.

Dated: May 17, 2021
Wilmington, Delaware

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