

**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

Hearing Date: Feb. 17, 2021 at 10:00 a.m. (ET)

Objection Deadline: Feb. 10, 2021 at 4:00 p.m. (ET)

**CENTURY’S MOTION TO COMPEL ICHOR CONSULTING, LLC
TO SUBMIT THE DISCLOSURES REQUIRED BY
FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

On January 6, 2021, J. Chad Edwards filed an appearance in these chapter 11 cases affirming that he does business as “Ichor Consulting, LLC,” and in this capacity represents tort claimants.²

While Mr. Edwards is an attorney, his page on the Texas State Bar website lists his occupation as “Non-Law-Related Employment” and reports that he is not in practice with any law firm.³ The address at which Ichor Consulting, LLC is registered, and the address listed on Ichor’s filings with the Court, is for a “virtual office” which allows users to “[o]perate from anywhere, while reflecting a corporate presence.”⁴ Ichor Consulting, LLC has no website, and there is no readily available information about the nature of this entity.⁵

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are: Boy Scouts of America (6300) and Delaware Boy Scouts, LLC (4311).

² D.I. 1903.

³ Declaration of Andrew Kirschenbaum (“Kirschenbaum Decl.”) Ex. 1.

⁴ Kirschenbaum Decl. Ex. 2.

⁵ An Edgar Search did not reveal any information on the company. Kirschenbaum Decl. Ex. 3.

No additional information has been provided to the Court or the parties about what Ichor Consulting is or its economic interest in the case. Nor have any details been provided regarding Ichor's employment, including retention agreements, fee-sharing agreements, equity partners, and/or co-counsel agreements. Century wrote BSA's bankruptcy counsel on January 6 to ask what Ichor Consulting, LLC is and what role it plays in the case and received no response.⁶

As this Court has explained in this case, "[t]he purpose of Rule 2019 is transparency; transparency with respect to the economic interests of groups is necessary so that other parties in interest and the Court can evaluate the positions the group advocates in a proper context. It is to understand the agenda of the group."⁷ Other courts are in accord.⁸

WHEREFORE, Century⁹ respectfully moves for entry of an Order,¹⁰ substantially in the form attached hereto as Exhibit A, compelling J. Chad Edwards, stating he does business as Ichor Consulting, LLC, to provide the information specified in Exhibit A pursuant to Rule 2019.¹¹

⁶ Kirschenbaum Decl. Ex. 4. (Jan. 6, 2021, email regarding Ichor Consulting).

⁷ Oct. 16, 2020 Hr'g Tr. at 9:8–13.

⁸ *See Baron & Budd, P.C. v. Unsecured Asbestos Claimants*, 321 B.R. 147, 167 (D.N.J. 2005); *see also In re Archdiocese of Saint Paul and Minneapolis*, No. 15-30125 (Feb. 27, 2017) [Dkt. 984] (Kirschenbaum Decl. Ex. 5).

⁹ "Century" refers to Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America and Indemnity Insurance Company of North America.

¹⁰ Century wrote to Mr. Edwards, asking that he submit a Rule 2019 statement, but received no response. Kirschenbaum Decl. Ex. 6.

¹¹ Notice of this motion was provided to the following parties or their respective counsel: (a) the U.S. Trustee; (b) the Debtors; (c) the Official Committee of Unsecured Creditors; (d) the Official Committee of Tort Claimants; (e) the Future Claims Representative; (f) the Coalition of Abused Scouts for Justice; and (g) any other party that has requested notice pursuant to Bankruptcy Rule 2002. No previous request for the relief sought herein has been made to this Court or any other court.

Dated: February 3, 2021

Respectfully Submitted,

By: /s/ Stamatios Stamoulis
Stamatios Stamoulis (#4606)

STAMOULIS & WEINBLATT LLC
800 N. West Street
Third Floor
Wilmington, Delaware 19801
Telephone: 302 999 1540
Facsimile: 302 762 1688

O'MELVENY & MYERS LLP
Tancred Schiavoni (*pro hac vice*)
Gary Svirsky (*pro hac vice*)
Andrew Kirschenbaum (*pro hac vice*)
Times Square Tower
7 Times Square
New York, New York 10036-6537
Telephone: 212 326 2000
Facsimile: 212 326 2061

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

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
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Debtors.

Chapter 11

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Hearing Date: Feb. 17, 2021 at 10:00 a.m. (ET)

Objection Deadline: Feb. 10, 2021 at 4:00 p.m. (ET)

**[PROPOSED] ORDER GRANTING CENTURY’S MOTION TO COMPEL
J. CHAD EDWARDS, ESQ. D/B/A ICHOR CONSULTING, LLC
TO SUBMIT THE DISCLOSURES REQUIRED
BY FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Upon the motion (the “Motion”)² of Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America and Indemnity Insurance Company of North America (“Century”) for entry of an Order granting certain relief requested in the Motion (D.I. _____), it is HEREBY ORDERED THAT:

1. The Motion is GRANTED
2. Ichor Consulting LLC and J. Chad Edwards must produce the following information pursuant to Rule 2019:
 - A. A list of the names and addresses of all creditors (including creditors for whom the filing counsel is acting as co-counsel), and a general statement about the nature of their respective claims and when those claims arose.
 - B. A complete copy of each form of retainer agreement, fee agreement, engagement agreement, referral agreement and other agreements authorizing Ichor Consulting, LLC and Mr. Edwards to act on behalf of a

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 Boy Scouts, LLC (4311). The Debtors’ mailing address is 1325 West Walnut Lane, Irving, Texas 75038.

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

creditor in this case, consenting to the payment of Ichor Consulting, LLC's and Mr. Edwards' fees and costs and their representation of multiple parties, including all amendments and modification to any such agreements.

- C. A list and explanation of any co-counsel, consultant, or fee-sharing relationships and arrangements in connection with this bankruptcy case or claims against any of the Debtors, and attachment of copies of any documents that were signed in conjunction with creating that relationship or arrangement.
- D. All other information and disclosures required by Fed. R. Bankr. P. 2019.

Dated _____

United States Bankruptcy Judge

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

In re:

BOY SCOUTS OF AMERICA AND
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Debtors.

Chapter 11

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**DECLARATION OF ANDREW KIRSCHENBAUM IN SUPPORT OF
CENTURY'S MOTION TO COMPEL ICHOR CONSULTING, LLC
TO SUBMIT THE DISCLOSURES REQUIRED BY
FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

I, Andrew Kirschenbaum, pursuant to 28 U.S.C. § 1746(2), under penalty of perjury,
hereby declare as follows:

1. I am an associate at the firm O'Melveny & Myers LLP, Counsel for Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America and Indemnity Insurance Company of North America, Westchester Fire Insurance Company, and Westchester Surplus Lines Insurance Company. I submit this declaration based on my personal knowledge of the proceedings in *In re Boy Scouts of America and Delaware BSA, LLC*, and review of the documents and media described below.

2. Attached as **Exhibit 1** is a true and correct copy of the State Bar of Texas Page for John Chad Edwards, available at <https://www.texasbar.com/AM/Template.cfm?>

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 ("BSA") (6300) and Delaware Boy Scouts, LLC (4311). The Debtors' mailing address is 1325 West Walnut Lane, Irving, Texas 75038.

[Section=Find_A_Lawyer&template=/Customsource/MemberDirectory/MemberDirectoryDetail.cfm&ContactID=351556](#) (last accessed February 2, 2021).

3. Attached as **Exhibit 2** is a true and correct copy of a page from the OpusVO Website advertising a virtual office location at 3626 North Hall Street (Two Oak Lawn), Ste 610 Dallas, TX 75219, available at <https://www.opusvirtualoffices.com/virtual-office/texas/dallas/location-1255/> (last accessed February 2, 2021).

4. Attached as **Exhibit 3** is a page from the SEC.gov website reflecting a search of the Electronic Data Gathering, Analysis, and Retrieval (EDGAR) system for “Ichor Consulting.”

5. Attached as **Exhibit 4** is a true and correct copy of an email sent by Tancred Schiavoni to Jessica Boelter on January 6, 2021.

6. Attached as **Exhibit 5** is a true and correct copy of an Order entered on February 27, 2017 by the Honorable Robert J. Kressel in *In re Archdiocese of Saint Paul and Minneapolis*, No. 15-30125 at Docket No. 984, granting debtor’s motion for an order requiring compliance with Rule 2019 of the Federal Rules of Bankruptcy Procedure.

7. Attached as **Exhibit 6** is a true and correct copy of a letter sent by Gary Svirsky to J. Chad Edwards on January 26, 2021.

I declare under pain and penalty of perjury of the laws of the United States that the foregoing is true and correct.

Dated: February 3, 2021

Respectfully Submitted,

By: /s/ Andrew Kirschenbaum

ANDREW KIRSCHENBAUM

EXHIBIT 1



STATE BAR of TEXAS



JOHN CHAD EDWARDS

Eligible to Practice in Texas

Bar Card Number: 24102843

TX License Date: 12/08/2016

Primary Practice Location:

2940 Commerce St
Dallas, TX 75226

CONTACT INFORMATION

Tel: -- ☎

Practice Areas: None Reported By Attorney

Statutory Profile Last Certified On: 06/17/2020

PRACTICE INFORMATION

Firm: None Reported By Attorney

Firm Size: Solo

Occupation: Non-Law-Related Employment

Practice Areas: None Reported By Attorney

Services Provided:

Deaf/Hard of Hearing Translation: Not Specified

ADA-accessible client service: Not Specified

Language translation: Not Specified

Fee Options Provided: ?

None Reported By Attorney

Please note: Not all payment options are available for all cases, and any payment arrangement must be agreed upon by the attorney and his/her client. The State Bar of Texas is not responsible for payment arrangements between an attorney and his/her client.

COURTS OF ADMITTANCE

Federal:

Florida Middle Bankruptcy Court

Florida Middle District Court

Florida Southern Bankruptcy Court

Florida Southern District Court

Other Courts:

None Reported By Attorney

Other States Licensed:

California

Florida

Louisiana

Please note: This information is self-reported by Texas attorneys. Current license or admittance status can only be certified by the appropriate court or licensing entity.

Foreign Language Assistance:

None Reported By Attorney

LAW SCHOOL**School****Degree earned**

California Western School of Law
Doctor of Jurisprudence/Juris Doctor (J.D.)

Graduation Date 06/2001

University of Miami
Master of Laws

Graduation Date 06/2004

PUBLIC DISCIPLINARY HISTORY**State of Texas**

No Public Disciplinary History

Other States

None Reported By Attorney

Sanctions that indicate a judgment is on appeal are still in effect but are not final and subject to change. To request a copy of a disciplinary judgment that is not available online or for more information about a specific disciplinary sanction listed above, please contact the Office of the chief Disciplinary Counsel at (877) 953-5535.

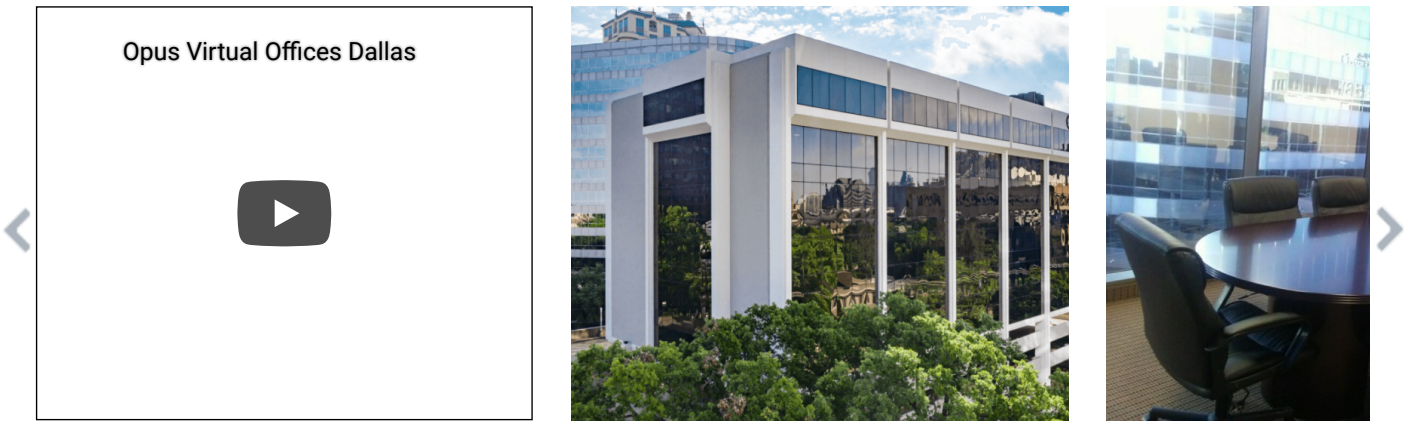
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EXHIBIT 2

[All Virtual Offices](#) > [Texas](#) > [Dallas](#) > [3626 North Hall Street \(Two Oak Lawn\)](#)

[Click Here to Sign-up](#)

Virtual Office Dallas, TX



Virtual office Dallas Location

3626 North Hall Street (Two Oak Lawn), S
Dallas, TX 75219
(214) 932-9906

[See on map](#)

All for
\$99/month
All inclusive
NO SMALL PRINT

All Virtual Office Services Below for only \$99/month

- ✓ Live Receptionist Answering Calls
 - ✓ Corporate Mailing Address
 - ✓ Company Phone Number
 - ✓ Company Fax Number
 - ✓ Premium Call Transferring (Call Forwarding)
- ✓ Voice Mail Converted to Email
 - ✓ Faxes Converted to Email
 - ✓ Discounted meeting room time available
 - ✓ Free Mail Scanning
- [Choose this location](#)

Our premium Dallas office space is located at 3626 North Hall Street (Two Oak Lawn), Ste 610, Dallas, TX 75219.

In addition to the features of the classic Opus Virtual Offices solution such as live receptionist call answer, corporate mailing address, voice mail converted to email, faxes converted to email and premium call transferring (call forwarding) this premium location offers optional hourly access to professionally staffed conference room facilities for those important face to face meetings. That's right, with a quick phone call use of a luxuriously appointed meeting room for a fraction of the price of maintaining a dedicated office space.

Virtual Office Reviews



Very efficient and affordable. The get is absolutely amazing and personalized too. We are really ve

Michael Davis, Internet Marketing, Fort FL

Why choose Opus VO for your Virtual Office

“9 out of 10 small businesses go out of business due to high rent costs and employee overhead.” ~ NY Post

Sign up for an Opus Virtual Office today and reap the benefits every entrepreneur is raving about Grow your business, while increasing flexibility Operate from anywhere, while reflecting a corporate presence, using our prestigious address locations without the prestigious rent Lower your overhead, while having access to a larger talent pool and increasing cash flow by access new and local markets

POPULAR PREMIUM LOCATIONS

Premium Virtual Office
Atlanta
Beverly Hills
Boca Raton
Chicago
Dallas
Delaware
Fort Lauderdale
Houston
Los Angeles
Miami
New York
Tampa

RESOURCES

Affiliate Program
Privacy Policy
Terms Of Use
Customer Support
Blog
Answering Service
Partners
Is It For Me?

POPULAR CITIES

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Beverly Hills
Boca Raton
Chicago
Dallas
Fort Lauderdale
Houston
Los Angeles
Miami
New York
Tampa
Wilmington

FOLLOW US



[Click here to contact us](#)



Opus Virtual offices
★★★★★
4.7 out of 5 based on 103 reviews on ekomi-us.com.

EXHIBIT 3



SEC.gov |

EDGAR

FAQ

Other search tools

?

Browse filing types

View all



Last 10 years

?

View all



SEARCH

No results found for your search!

EXHIBIT 4

From: Schiavoni, Tancred <tschiavoni@omm.com>
Sent: Wednesday, January 6, 2021 3:54 PM
To: Boelter, Jessica <jessica.boelter@whitecase.com>
Cc: Schiavoni, Tancred <tschiavoni@omm.com>
Subject: FW: [0705810-00073] Boy Scouts of America (Doc# 1903, Bankr. D. Del. 1:20-bk-10343)

What can you tell us about Ichor Consulting, LLC and how it represents claimants?

From: ECFdocuments@pacerpro.com <ECFdocuments@pacerpro.com>
Sent: Wednesday, January 6, 2021 1:43 PM
To: Schneider, Brandon D. <bschneider@omm.com>; Schiavoni, Tancred <tschiavoni@omm.com>; PACER <pacer@omm.com>; Kirschenbaum, Andrew <akirschenbaum@omm.com>; Panchok-Berry, Janine <jpanchok-berry@omm.com>; PacerPro - OMMNI <pacerpro-omnilink@omm.com>
Subject: [0705810-00073] Boy Scouts of America (Doc# 1903, Bankr. D. Del. 1:20-bk-10343)

[EXTERNAL MESSAGE]

Boy Scouts of America

Docket entry number: 1903

Notice of Appearance. Filed by Abuse Victims. (Edwards, John) (Entered: 01/06/2021)

Date entered: 2021-01-06

VIEW CASE

<https://app.pacerpro.com/cases/12273178>

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Questions? sales@pacerpro.com or (415) 890-4958

EXHIBIT 5

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

The Archdiocese of Saint Paul and
Minneapolis,

Debtor.

BKY 15-30125

Chapter 11

ORDER

This case is before the court on the debtor's motion for an order requiring compliance with Rule 2019 of the Federal Rules of Bankruptcy Procedure.

Based on the motion and file,

IT IS ORDERED:

On or before March 9, 2017, Jeff Anderson and Associates, P.A., shall comply with the provisions of Federal Rule of Bankruptcy Procedure 2019 by filing a verified disclosure containing the following:

A. A complete copy of each form of retainer agreement, fee agreement, engagement agreement, referral agreement and all other applicable agreements authorizing the Anderson Firm to act on behalf of a creditor in this case or providing in any way for the payment of the Anderson Firm's fees and costs, including all amendments and modification to any such agreements. The Anderson Firm shall provide exemplar copies of each version of the actual signed agreements entered into with creditors in this case. The Anderson Firm may redact the personally identifying information of those creditor clients from such agreements but may not

redact any other information. The disclosure shall further set forth by claimant number which exemplar agreements apply to each client.

B. All other information and disclosures required by Fed. R. Bankr. P. 2019.

Dated: *February 27, 2017*

/s/ Robert J. Kressel

Robert J. Kressel
United States Bankruptcy Judge

EXHIBIT 6



O'Melveny & Myers LLP
Times Square Tower
7 Times Square
New York, NY 10036-6537

T: +1 212 326 2000
F: +1 212 326 2061
omm.com

File Number:

January 26, 2021

Gary Svirsky
D: +1 212 326 4305
gsvirsky@omm.com

VIA EMAIL

J. Chad Edwards
Ichor Consulting, LLC
3626 N. Hall St. (Two Oak Lawn), Ste. 610
Dallas, TX 75219

Re: In re Boy Scouts of America, No. 20-10343

Dear Mr. Edwards:

We are writing to request that you submit a verified Rule 2019 statement in the above captioned case, providing the information required by the Rule. It should include a list of your clients.

Thank you.

Sincerely,

/s/ Gary Svirsky

Gary Svirsky
O'MELVENY & MYERS LLP

**IN THE UNITED STATES BANKRUPTCY COURT
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In re:

BOY SCOUTS OF AMERICA AND
DELAWARE BSA, LLC,¹

Debtors.

Chapter 11

Case No. 20-10343 (LSS)

Jointly Administered

**NOTICE OF CENTURY'S MOTION TO COMPEL
ICHOR CONSULTING, LLC TO SUBMIT THE DISCLOSURES REQUIRED BY
FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

PLEASE TAKE NOTICE that on February 3, 2021, Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America and Indemnity Insurance Company of North America, Westchester Fire Insurance Company and Westchester Surplus Lines Insurance Company filed with the United States Bankruptcy Court for the District of Delaware (the "Court") filed *Century's Motion to Compel Ichor Consulting, LLC to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019* (the "Motion").

PLEASE TAKE FURTHER NOTICE that if you wish to oppose the entry of an order approving the Motion you must (a) file a written response or objection ("Objection") if any, to the Motion with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before **February 10, 2021 at 4:00 p.m. (Eastern Time)** (the "Objection Deadline"); and (b) serve such Objection so as to be received on or before the Objection Deadline by counsel to Hartford and Century.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **February 17, 2021 at 10:00 a.m. (ET)** before the Honorable Laurie Selber Silverstein, United States Bankruptcy Judge, at the Court, 824 Market Street, 6th Floor, Courtroom No. 2, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO PROPERLY FILE AND SERVE A RESPONSE ON OR BEFORE THE OBJECTION DEADLINE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

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 ("BSA") (6300) and Delaware Boy Scouts, LLC (4311). The Debtors' mailing address is 1325 West Walnut Lane, Irving, Texas 75038.

Dated: February 3, 2021

Respectfully Submitted,

By: /s/ Stamatios Stamoulis
Stamatios Stamoulis (No. 4606)

Stamoulis & Weinblatt LLC

800 N. West Street

Third Floor

Wilmington, Delaware 19801

Telephone: (302) 999-1540

Facsimile: (302) 762-1688

O'Melveny & Myers LLP

Tancred Schiavoni (*pro hac vice*)

Gary Svirsky (*pro hac vice*)

Andrew Kirschenbaum (*pro hac vice*)

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*Counsel for Century Indemnity Company, as
successor to CCI Insurance Company, as
successor to Insurance Company of North
America and Indemnity Insurance Company of
North America, Westchester Fire Insurance
Company and Westchester Surplus Lines
Insurance Company*