IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC,¹

Case No. 20-10343 (LSS)

Debtors.

Jointly Administered

BOY SCOUTS OF AMERICA,

Plaintiff,

Adv. Pro. No. 20-50527 (LSS)

v.

A.A., et al.,

Re: Dkt Nos. 144, 145, 151

Defendants.

HARTFORD'S JOINDER IN SUPPORT OF BSA'S MOTION TO EXTEND THE PRELIMINARY INJUNCTION PURSUANT TO 11 U.S.C. §§ 105(a) AND 362

Hartford Accident and Indemnity Company, First State Insurance Company and Twin City Fire Insurance Company (collectively, "Hartford") file this joinder in support of BSA's Motion to Extend Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(a) and 362, filed on February 22, 2021 [Adv. Docket No. 144] (the "Motion") and states as follows:

Hartford does not agree with a number of the statements made in the Motion and BSA's supporting brief [Adv. Docket No. 145]. And Hartford certainly does not agree with any implication that a return of the Abuse Claims to the tort system will lead to an increase in BSA's or the BSA Related Parties' liability. To the contrary, Hartford firmly believes that if the

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.

claimants were required to prove their claims in court, BSA's and the BSA Related Parties' overall liability would be materially less than that which key claimant constituencies in this case evidently hope to obtain under Trust Distribution Procedures that do not provide for any careful scrutiny of the claimants' claims.

Having said this, Hartford supports the relief sought in the Motion. If nothing else, a continuation for a reasonable period of the Preliminary Injunction will allow all parties in interest to focus at this critical juncture in this Chapter 11 case on a possible global settlement, and the Debtors' reorganization efforts, rather than litigation.

WHEREFORE, Hartford respectfully joins in BSA's request in the Motion for an extension of the Preliminary Injunction.

Date: March 9, 2021 BAYARD, P.A.

/s/ Erin R. Fay

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CERTIFICATE OF SERVICE

I, Erin R. Fay, hereby certify that on the 9th day of March 2021, I caused copies of Hartford's Joinder in Support of BSA's Motion to Extend the Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(A) and 362 to be served via CM/ECF and email on the parties listed

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