

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

<p>In re:</p> <p>Boy Scouts of America and Delaware BSA, LLC,<sup>1</sup></p> <p style="text-align:center">Debtors.</p> <hr/> <p>BOY SCOUTS OF AMERICA</p> <p style="text-align:center">Plaintiff,</p> <p style="text-align:center">v.</p> <p>A.A., <i>et al.</i>,</p> <p style="text-align:center">Defendants.</p>	<p>Chapter 11</p> <p>Case No. 20-10343 (LSS) (Jointly Administered)</p> <p><b>Re: Dkt. No. 858</b></p> <p>Adv. Pro. No. 20-50527 (LSS)</p> <p>Re: Adv. Dkt. Nos. 151-1, 156</p>
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**JOINDER OF THE CREDITORS' COMMITTEE TO THE  
REPLY OF THE BOY SCOUTS OF AMERICA TO CENTURY'S OBJECTION TO THE  
FOURTH STIPULATION MODIFYING THE CONSENT ORDER GRANTING THE  
BSA'S MOTION FOR A PRELIMINARY INJUNCTION [ADV. PRO. DKT. NO. 156]**

The Official Committee of Unsecured Creditors (the “**Creditors’ Committee**”) of Boy Scouts of America and Delaware BSA, LLC (collectively, the “**Debtors**”) by and through its undersigned counsel, hereby submits this joinder (the “**Joinder**”) to the *Reply of the Boy Scouts of America to Century’s Objection to the Fourth Stipulation Modifying the Consent Order Granting the BSA’s Motion for a Preliminary Injunction* [Adv. Pro. Dkt. No. 156] (the “**Reply**”) in support of entry of the *Fourth Stipulation by and Among the Boy Scouts of America, the Official Committee of Survivors of Abuse and the Official Committee of Unsecured Creditors Modifying the Consent*

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<sup>1</sup> The Debtors in these chapter 11 cases, together with the last four digits of each Debtors’ 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, TX 75038.

*Order Granting the BSA's Motion for a Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(a) and 362 and Further Extending the Termination Date of the Standstill Period (the "**Fourth Stipulation**")*<sup>2</sup> [Adv. Pro. Dkt. No. 151-1] and respectfully states as follows:

### **STATEMENT**

1. As noted by the Debtors in their Reply, the Fourth Stipulation is supported by the estate fiduciaries – the Debtors, the Creditors' Committee, and the TCC – and numerous other parties in interest have appeared to note their support of the Fourth Stipulation. [Adv. Pro. Dkt. Nos. 148, 150, 153, 154]. The sole objector to the Fourth Stipulation is Century Indemnity, who is supportive of the underlying relief sought in the Fourth Stipulation but takes issue with certain of the terms necessary to achieve that relief on a consensual basis. [Adv. Pro. Dkt. No. 152].

2. The Creditors' Committee joins in the arguments made by the Debtors in the Reply, and respectfully submits that the concerns raised by Century Indemnity are misplaced, and should not be permitted to disrupt the carefully negotiated terms of the Fourth Stipulation. The underlying relief sought therein – the extension of the Preliminary Injunction until July 19, 2021 – is simply too important to the successful outcome of these Chapter 11 Cases.

3. The Debtors have just begun the first of many steps towards what the Creditors' Committee hopes will result in a confirmed Plan of Reorganization, and are seeking to have a confirmation hearing scheduled for July 26, 2021. [Dkt. No. 2295, at 4]. The next few months of these Chapter 11 Cases will be crucial, and it is critical that the Debtors and other parties in interest are able to focus on moving these cases towards a consensual resolution, and not faced with the distraction of further extensions of the Preliminary Injunction or worse, a failure to extend the Preliminary Injunction and the ensuing litigation.

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<sup>2</sup> Capitalized terms used but not defined herein have the meanings ascribed to them in the Fourth Stipulation.

4. The Creditors' Committee respectfully requests that the Court enter the Fourth Stipulation.

Dated: March 16, 2021  
Wilmington, Delaware

Respectfully submitted,

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