

**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)

OFFICIAL TORT CLAIMANTS'
COMMITTEE OF BOY SCOUTS OF
AMERICA AND DELAWARE BSA, LLC,

Plaintiff,

v.

BOY SCOUTS OF AMERICA AND
DELAWARE BSA, LLC,

Defendants.

Adv. Pro. No. 21-50032 (LSS)

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING STIPULATION
FOR FURTHER EXTENSION OF TIME**

Undersigned counsel to the Boy Scouts of America and Delaware BSA, LLC (together, the "Debtors") hereby certifies as follows:

1. On January 8, 2021, the Official Tort Claimants' Committee of Boy Scouts of America and Delaware BSA (the "Plaintiff") commenced the above-captioned adversary proceeding by filing a *Complaint* [D.I. 1] (the "Complaint") against the Debtors.

¹ The Debtors in the 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 BSA, LLC ("Delaware BSA") (4311). The Debtors' mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

2. On February 1, 2021, the Complaint and *Summons and Notice of Pretrial Conference* [D.I. 3] were served on the Debtors.

3. On March 3, 2021, the Court entered the *Order Approving Stipulation for Extension of Time* [D.I. 5], which extended the time within which the Debtors must answer, move, or otherwise respond to the Complaint to and including April 2, 2021.

4. On April 5, 2021, the Court entered the *Order Approving Stipulation for Further Extension of Time* [D.I. 10], which further extended the time within which the Debtors must answer, move, or otherwise respond to the Complaint to and including April 16, 2021.

5. The Plaintiff has agreed to a further extension of the time within which the Debtors must answer, move, or otherwise respond to the Complaint to and including April 23, 2021, all as set forth in the *Stipulation for Further Extension of Time* (the “Stipulation”) by and among the Plaintiff and Debtors.

6. Accordingly, the Debtors respectfully request that the Court enter the Order attached hereto as **Exhibit A**, approving the Stipulation appended to the Order as **Schedule 1**, at its earliest convenience.

[Remainder of Page Intentionally Left Blank]

Dated: April 14, 2021
Wilmington, Delaware

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EXHIBIT A

PROPOSED ORDER

**IN THE UNITED STATES BANKRUPTCY COURT
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Adv. Pro. No. 21-50032 (LSS)

ORDER APPROVING STIPULATION FOR FURTHER EXTENSION OF TIME

THE COURT, having considered the *Stipulation for Further Extension of Time* (the "Stipulation"), attached hereto as **Schedule 1** by and among (i) the Official Tort Claimants' Committee of Boy Scouts of America and Delaware BSA, LLC (the "Plaintiff"), and (ii) the Boy Scouts of America and Delaware BSA, LLC (together, the "Debtors"); and the Court having determined that good and adequate cause exists for the approval of the Stipulation granted herein, pursuant to FED. R. BANKR. P. 9006(b)(1) and DEL. BANKR. L.R. 7012-2; and the Court having determined that no other or further notice of the Stipulation need be given,

¹ The Debtors in the 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 BSA, LLC ("Delaware BSA") (4311). The Debtors' mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

IT IS HEREBY ORDERED THAT:

1. The Stipulation is APPROVED as set forth herein.
2. The time within which the Debtors must answer, move, or otherwise respond to the *Complaint* [D.I. 1] shall be, and hereby is, extended to and including April 23, 2021.
3. The relief granted herein is without prejudice to the Plaintiff's and Debtors' rights to seek or oppose additional extensions of time.
4. This Order shall be effective immediately upon entry on the docket.
5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

SCHEDULE 1

STIPULATION

**IN THE UNITED STATES BANKRUPTCY COURT
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Plaintiff,

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Defendants.

Adv. Pro. No. 21-50032 (LSS)

STIPULATION FOR FURTHER EXTENSION OF TIME

This *Stipulation for Extension of Time* (the "Stipulation") is entered into by and among (i) the Official Tort Claimants' Committee of Boy Scouts of America and Delaware BSA, LLC (the "Plaintiff"), and (ii) Boy Scouts of America and Delaware BSA, LLC (together, the "Debtors"). The Plaintiffs and Debtors are collectively referred to herein as the "Parties."

R E C I T A L S:

WHEREAS, on January 8, 2021, the Plaintiffs commenced the above-captioned adversary proceeding by filing a *Complaint* [D.I. 1] (the "Complaint") against the Debtors;

¹ The Debtors in the 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 BSA, LLC ("Delaware BSA") (4311). The Debtors' mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

WHEREAS, a *Summons and Notice of Pretrial Conference* [D.I. 3] was issued with respect to the Debtors on February 1, 2021, thereby establishing March 3, 2021 as the date by which Debtors are required to answer, move, or otherwise respond to the Complaint;

WHEREAS, the Debtors have requested that their deadline to answer, move, or otherwise respond to the Complaint be extended to and including April 23, 2021;

WHEREAS, the Plaintiff has consented to such an extension; and

WHEREAS, the Parties acknowledge that the Court must approve any such extension of time.

NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE INCORPORATED AS THOUGH FULLY STATED FORTH HEREIN, IT IS HEREBY STIPULATED AND AGREED, BY AND AMONG THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER, THAT:

1. The time within which the Debtors must answer, move, or otherwise respond to the Complaint is extended to and including April 23, 2021.
2. The Stipulation is without prejudice to any application for, opposition to, or Stipulation for further extensions.

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