

**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)

**NOTICE OF SECOND AMENDED² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON NOVEMBER 29, 2021, AT 2:00 P.M. EASTERN TIME**

This remote hearing will be conducted entirely over Zoom and requires all participants to register in advance. Please register by November 29, 2021, at 8:00 a.m. Eastern Time.

COURTCALL WILL NOT BE USED FOR THIS HEARING.

Please use the following link to register for this hearing:

<https://debuscourts.zoomgov.com/meeting/register/vJItfuigqDkqE16qOuAcsZlSkEs15NFwK6s>

After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.

Topic: Boy Scouts of America

Time: November 29, 2021, at 2:00 p.m. Eastern Time (US and Canada)

MATTERS GOING FORWARD:

1. Motion of Marc J. Bern & Partners LLC to Quash Subpoena to Produce Documents Issued to KLS Legal Solutions LLC ([D.I. 6380](#), filed 9/27/21).

Objection Deadline: None.

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

² **Amended items appear in bold.**

Responses Received:

- a) Century's Objection to Marc J. Bern & Partners' Motion to Quash Subpoena to Produce Documents Issued to KLS Legal Solutions, LLC ([D.I. 6598](#), filed 10/12/21);
- b) Notice of Joinder of Andrews & Thornton, Attorneys at Law, and ASK LLP to Docket Nos. 6380, 6873, and 6945 ([D.I. 6956](#), filed 11/03/21); and
- c) Zurich Insurers' Joinder to Century's Objection to Marc J. Bern & Partners' Motion to Quash Subpoena to Produce Documents Issued to KLS Legal Solutions, LLC ([D.I. 7158](#), filed 11/11/21).

Related Pleadings:

- a) Letter from William D. Sullivan, Esq. to the Honorable Chief Judge Laurie Selber Silverstein regarding Marc J. Bern & Partners, LLC Motion to Quash ([D.I. 6651](#), filed 10/18/21); and
- b) Reply in Support of Motion of Marc J. Bern & Partners LLC to Quash Subpoena to Produce Documents Issued to KLS Legal Solutions, LLC ([D.I. 6873](#), filed 10/29/21).

Status: The Debtors have been informed that the parties to this matter have agreed to adjourn this matter to a date to be determined.

- 2. Letter to the Honorable Chief Judge Laurie Selber Silverstein Seeking an Order Compelling Verus LLC to Comply with a Subpoena ([D.I. 6813](#), filed 10/27/21).

Objection Deadline: November 3, 2021, at 10:00 a.m. (ET).

Responses Received:

- a) Letter to the Honorable Chief Judge Laurie Selber Silverstein in Response to Century's Letter Seeking an Order to Compel Verus to Produce Privileged Information ([D.I. 6945](#), filed 11/03/21);
- b) Affidavit of Mark Eveland in Opposition to Century's Request to Compel Verus, LLC ([D.I. 6946](#), filed 11/03/21);
- c) Notice of Joinder of Andrews & Thornton, Attorneys at Law, and ASK LLP to Docket Nos. 6380, 6873, and 6945 ([D.I. 6956](#), filed 11/03/21); and
- d) Zurich Insurers' Joinder to Century's Letter to the Honorable Chief Judge Laurie Selber Silverstein Seeking an Order Compelling Verus LLC to Comply with a Subpoena ([D.I. 7157](#), filed 11/11/21).

Related Pleadings:

- a) Declaration of Stamatiios Stamoulis in Support of Century's Request to Compel Verus, LLC ([D.I. 6814](#), filed 10/27/21);
- b) Letter to the Honorable Chief Judge Laurie Selber Silverstein in Reply Further Supporting an Order Compelling Verus LLC to Comply with a Subpoena ([D.I. 7052](#), filed 11/09/21); and
- c) Declaration of Stamatiios Stamoulis in Support of Century's Motion to Compel Production by Verus, LLC to Comply with Century's Rule 2004 Subpoena ([D.I. 7054](#), filed 11/09/21).

Status: The Debtors have been informed that the parties to this matter have agreed to adjourn this matter to a date to be determined.

- 3. Letter to the Honorable Chief Judge Laurie Selber Silverstein from Kelly T. Currie Regarding Insurers' Omnibus Motion to Compel Kosnoff Law PLLC, AVA Law Group, Napoli Shkolnik, PLLC, Krause & Kinsman Law Firm, Andrews & Thornton, Attorneys at Law, and ASK LLP to Respond to Document Requests and Interrogatories ([D.I. 7239](#), filed 11/15/21).

Objection Deadline: November 18, 2021.

Responses Received:

- a) Letter to the Honorable Chief Judge Laurie Selber Silverstein from Joseph Grey Opposing the Letter filed by Certain Insurers Seeking to Compel Kosnoff Law Firm, PPLC, AVA Law Group, Inc., Napoli Shkolnik, LLC, Krause & Kinsman Law Firm, Andrews & Thornton, Attorneys at Law, and ASK LLP to Respond to Document Requests and Interrogatories ([D.I. 7444](#), filed 11/24/21); **and**
- b) **Notice of Opposition to Insurers' Motion to Compel ([D.I. 7334](#), filed 11/18/21).**

Related Pleadings:

- a) Letter to the Honorable Chief Judge Laurie Selber Silverstein from Joseph Grey Regarding Letter from Certain Insurers' to Compel Kosnoff Law PLLC, AVA Law Group, Inc. Napoli Shkonik, PLLC, Krause & Kinsman Law Firm, Andrews & Thornton, Attorneys at Law and ASK LLP to Respond Individually to Insurers' Document Requests and Interrogatories ([D.I. 7324](#), filed 11/18/21).

Status: This matter is going forward.

4. Letter to the Honorable Chief Judge Laurie Selber Silverstein from Tancred Schiavoni Seeking an Order Compelling Baltimore Area Council to Comply with a Subpoena ([D.I. 7261](#), filed 11/16/21).

Objection Deadline: November 19, 2021.

Responses Received:

- a) Letter to the Honorable Chief Judge Laurie Selber Silverstein from Todd M. Brooks Regarding Baltimore Area Council's Response to Century's Letter Motion to Compel ([D.I. 7351](#), filed 11/19/21).

Related Pleadings:

- a) Declaration of Samantha Indelicato in Support of Century's Motion to Compel Baltimore Area Council ([D.I. 7262](#), filed 11/16/21);
- b) Letter to the Honorable Chief Judge Laurie Selber Silverstein from Tancred Schiavoni in Reply Further Supporting an Order Compelling Baltimore Area Council to Comply with a Subpoena ([D.I. 7407](#), filed 11/23/21); **and**
- c) **Supplemental Declaration of Todd M. Brooks in Further Support of the Baltimore Area Council's Opposition to Century Indemnity Company's Letter-Motion to Compel a Third Production of Documents ([D.I. 7469](#), filed 11/29/21).**

Status: The Debtors have been informed that counsel for Century has requested this matter be adjourned and that counsel for Baltimore Area Council has not agreed to adjourn this matter. The Debtors request this matter be adjourned to a date to be determined to allow the parties to focus on ongoing mediation in connection with confirmation.

5. Letter to the Honorable Chief Judge Laurie Selber Silverstein from Tancred Schiavoni Seeking an Order Compelling Cradle of Liberty Council to Comply with a Subpoena ([D.I. 7263](#), filed 11/17/21).

Objection Deadline: November 22, 2021.

Responses Received:

- a) Letter to the Honorable Chief Judge Laurie Selber Silverstein from Jeffrey A. Lutsky Regarding Response of Cradle of Liberty Council to Century's Letter Motion to Compel ([D.I. 7383](#), filed 11/20/21).

Related Pleadings:

- a) Declaration of Samantha Indelicato in Support of Century's Motion to Compel Cradle of Liberty Council ([D.I. 7264](#), filed 11/16/21);

- b) Letter to the Honorable Chief Judge Laurie Selber Silverstein from Tancred Schiavoni in Reply Further Supporting an Order Compelling Cradle of Liberty Council to Comply with a Subpoena ([D.I. 7408](#), filed 11/23/21); **and**
- c) **Letter of Cradle of Liberty Council in Further Support of Opposition to Century's Motion to Compel ([D.I. 7468](#), filed 11/29/21).**

Status: The Debtors have been informed that counsel for Century has requested this matter be adjourned and that counsel for Cradle of Liberty Council has not agreed to adjourn this matter. The Debtors request this matter be adjourned to a date to be determined to allow the parties to focus on ongoing mediation in connection with confirmation.

- 6. Letter to the Honorable Chief Judge Laurie Selber Silverstein from Tancred Schiavoni Moving to Compel the Compliance of the National Capital Area Council with Century's Subpoena ([D.I. 7384](#), filed 11/21/21).

Objection Deadline: November 24, 2021.

Responses Received:

- a) Letter to the Honorable Chief Judge Laurie Selber Silverstein regarding Century Indemnity Company's Letter to compel the National Capital Area Council ([D.I. 7446](#), filed 11/24/21).

Related Pleadings:

- a) Declaration of Samantha Indelicato in Support of Century's Motion to Compel National Capital Area Council ([D.I. 7385](#), filed 11/21/21).

Status: The Debtors have been informed that counsel for Century has requested this matter be adjourned and that counsel for National Capital Area Council has not agreed to adjourn this matter. The Debtors request this matter be adjourned to a date to be determined to allow the parties to focus on ongoing mediation in connection with confirmation.

- 7. **[SEALED] Emergency Motion of the Official Committee of Tort Claimants for Entry of an Order Pursuant to Sections 105, 1103, 1125, and 1126 of the Bankruptcy Code Appointing a Plan Voting Ombudsperson and Granting Related Relief (D.I. 7445, filed 11/24/21).**

Objection Deadline: To be determined.

Responses Received:

- a) **Kosnoff Law, PLLC's Response in Support of Emergency Motion to Appoint a Plan Voting Ombudsperson ([D.I. 7461](#), filed 11/24/21); and**

- b) Debtors' Omnibus Objection to Tort Claimants' Committee's (I) Emergency Motion for Entry of an Order Pursuant to Sections 105 and 1103 of the Bankruptcy Code Appointing a Plan Voting Ombudsperson and Granting Related Relief and (II) Related Motion to Shorten Notice ([D.I. 7467](#), filed 11/29/21).

Related Pleadings:

- a) [REDACTED] Emergency Motion of the Official Committee of Tort Claimants for Entry of an Order Pursuant to Sections 105, 1103, 1125, and 1126 of the Bankruptcy Code Appointing a Plan Voting Ombudsperson and Granting Related Relief ([D.I. 7447](#), filed 11/24/21);
- b) Joinder of the Zalkin Law Firm, P.C. and Pfau Cochran Vertetis Amala PLLC to the Emergency Motion of the Official Committee of Tort Claimants for Entry of an Order Pursuant to Sections 105, 1103, 1125, and 1126 of the Bankruptcy Code Appointing a Plan Voting Ombudsperson and Granting Related Relief ([D.I. 7459](#), filed 11/24/21);
- c) Declaration of Jason Amala in Support of Joinder of the Joinder of the Zalkin Law Firm, P.C. and Pfau Cochran Vertetis Amala PLLC to the Emergency Motion of the Official Committee of Tort Claimants for Entry of an Order Pursuant to Sections 105, 1103, 1125, and 1126 of the Bankruptcy Code Appointing a Plan Voting Ombudsperson and Granting Related Relief ([D.I. 7460](#), filed 11/24/21).

Status: This matter is going forward as a status conference.

- 8. Motion to Shorten Notice Period and Schedule Hearing on Emergency Motion of the Official Committee of Tort Claimants for Entry of an Order Pursuant to Sections 105, 1103, 1125, and 1126 of the Bankruptcy Code Appointing a Plan Voting Ombudsperson and Granting Related Relief ([D.I. 7448](#), filed 11/24/21).

Objection Deadline: To be determined.

Responses Received:

- a) The United States Trustee's Objection to Emergency Motion of the Official Committee of Tort Claimants for Entry of an Order Shortening the Notice and Objection Periods for Emergency Motion of the Official Committee of Tort Claimants for Entry of an Order Pursuant to Sections 105, 1103, 1125, and 1126 of the Bankruptcy Code Appointing a Plan Voting Ombudsperson and Granting Related Relief (D.E. 7448) ([D.I. 7450](#), filed 11/24/21); and

- b) **Debtors' Omnibus Objection to Tort Claimants' Committee's (I) Emergency Motion for Entry of an Order Pursuant to Sections 105 and 1103 of the Bankruptcy Code Appointing a Plan Voting Ombudsperson and Granting Related Relief and (II) Related Motion to Shorten Notice ([D.I. 7467](#), filed 11/29/21).**

Related Pleadings: None.

Status: This matter is going forward as a status conference.

9. **Motion for Entry of an Order Authorizing the Tort Claimants' Committee to File Under Seal Certain Exhibits and Information in Support of the Emergency Motion of the Official Committee of Tort Claimants for Entry of an Order Shortening the Notice and Objection Periods for Emergency Motion of the Official Committee of Tort Claimants for Entry of an Order Pursuant to Sections 105, 1103, 1125, and 1126 of the Bankruptcy Code Appointing a Plan Voting Ombudsperson and Granting Related Relief ([D.I. 7449](#), filed 11/24/21).**

Objection Deadline: To be determined.

Responses Received: None.

Related Pleadings: None.

Status: This matter is going forward as a status conference.

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Dated: November 29, 2021
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Paige N. Topper

Derek C. Abbott (No. 3376)
Andrew R. Remming (No. 5120)
Paige N. Topper (No. 6470)
1201 North Market Street, 16th Floor
P.O. Box 1347
Wilmington, Delaware 19899-1347
Telephone: (302) 658-9200
Email: dabbott@morrisnichols.com
aremming@morrisnichols.com
ptopper@morrisnichols.com

– and –

WHITE & CASE LLP

Jessica C. Lauria (admitted *pro hac vice*)
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 819-8200
Email: jessica.lauria@whitecase.com

– and –

WHITE & CASE LLP

Michael C. Andolina (admitted *pro hac vice*)
Matthew E. Linder (admitted *pro hac vice*)
Laura E. Baccash (admitted *pro hac vice*)
Blair M. Warner (admitted *pro hac vice*)
111 South Wacker Drive
Chicago, Illinois 60606
Telephone: (312) 881-5400
Email: mandolina@whitecase.com
mlinder@whitecase.com
laura.baccash@whitecase.com
blair.warner@whitecase.com

**ATTORNEYS FOR THE DEBTORS AND
DEBTORS IN POSSESSION**