

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

In re: ) Chapter 11  
BOY SCOUTS OF AMERICA AND ) Case No. 20-10343 (LSS)  
DELAWARE BSA, LLC, et al., Debtors. ) (Jointly Administered)  
)

**NOTICE OF RESPONSE OF LAW FIRMS TO NOTICE OF WITHDRAWAL OF  
VERUS, LLC’S OPPOSITION TO CENTURY INDEMNITY COMPANY’S LETTER  
SEEKING TO COMPEL VERUS, LLC TO RESPOND TO SUBPOENA AND REQUEST  
TO BE HEARD ON MONDAY, DECEMBER 6, 2021**

This Notice is submitted by seven law firms—indicated in the signature block below—who contracted with Verus, LLC (the “Law Firms”) in response to that company’s withdrawal (Doc. 7551) of its response to Century Indemnity Company’s letter seeking the production of documents and information subject to the attorney-client privilege and work product doctrine.

Although Verus, LLC has unilaterally withdrawn its opposition letter (Doc. 6945) and the Affidavit of Mark Eveland in support (Doc. 6946), it did so without first securing the permission of the Law Firms that filed joinders in that objection. (*See* Doc. 6956.) The Law Firms continue to assert that significant portions of the documents and information that Century Indemnity Company is seeking are subject to various privileges, including but not limited to the attorney-client privilege and the work product doctrine.

Given the Court’s useful guidance at the hearing on Thursday, December 2, 2021, the Law Firms ask for time to meet-and-confer with counsel for all parties to narrow the issues of privilege and work product doctrine.

Further, the Law Firms ask that the undersigned counsel be granted the opportunity to address the issue on Monday, December 6, 2021, at the hearing scheduled for that day.

Respectfully Submitted,

Dated: December 5, 2021

/s/ Raeann Warner

Raeann Warner, Esq. (# 4931)  
Jacobs & Crumplar, P.A.  
750 Shipyard Dr.  
Wilmington, DE 19801  
(302) 656-5445  
raeann@jcdelaw.com

and

Jonathan Hilton (0095742)  
HILTON PARKER LLC  
7544 Slate Ridge Blvd.  
Reynoldsburg, OH 43068  
Tel: (614) 992-2277  
Fax: (614) 927-5980  
[jhilton@hiltonparker.com](mailto:jhilton@hiltonparker.com)  
(admitted *Pro Hac Vice*)

*Attorney for the Law Firms:*

KRAUSE & KINSMAN  
WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN,  
LLP  
JAMES HARRIS LAW, PLLC  
ANDREOZZI & FOOTE, P.C.  
BABIN LAW, LLC  
COONEY & CONWAY  
DAVIS BETHUNE & JONES