

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

In re:

BOY SCOUTS OF AMERICA AND  
DELAWARE BSA, LLC,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-10343 (LSS)

(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON OCTOBER 19, 2021, AT 10:00 A.M. (EASTERN TIME)**

**This remote hearing will be conducted entirely over Zoom and requires all participants to register in advance. Please register by October 19, 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/vJIsf-6hqj4oHB\\_7xRt4mNfTI-4QQq\\_kYY](https://debuscourts.zoomgov.com/meeting/register/vJIsf-6hqj4oHB_7xRt4mNfTI-4QQq_kYY)**

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

Topic: Boy Scouts of America

**Time: October 19, 2021, at 10:00 a.m. Eastern Time (US and Canada)**

**RESOLVED MATTERS**

1. The Tort Claimants' Committee's Application for Entry of an Order Under 11 U.S.C. §§ 1103(a) and 328(a) and Fed. R. Bankr. P. 2014(a) Authorizing Retention of the Claro Group LLC as Expert Consultant on Sexual Abuse and Expert Witness Effective as of September 1, 2021 ([D.I. 6287](#), filed 9/17/21).

**Objection Deadline:** October 1, 2021, at 4:00 p.m. (Eastern Time).

**Responses Received:** None.

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<sup>1</sup> 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.

Related Pleadings:

- a) Order Authorizing and Approving the Tort Claimants' Committee's Application for Entry of an Order Under 11 U.S.C. §§ 1103(a) and 328(a) and Fed. R. Bankr. P. 2014(a) Authorizing Retention of the Claro Group LLC as Expert Consultant on Sexual Abuse and Expert Witness Effective as of September 1, 2021 ([D.I. 6527](#), filed 10/08/21).

Status: An order has been entered. No hearing is necessary.

2. (WITHDRAWN) Motion of Official Committee of Tort Claimants for Authority to Issue Identical Subpoenas as Insurers in Certain Rule 2004 Discovery Relating to Claims Aggregators ([D.I. 6271](#), filed 9/17/21).

Objection Deadline: October 1, 2021, at 4:00 p.m. (Eastern Time).

Responses Received:

- a) Objection of the Coalition of Abused Scouts for Justice to Century Motion for Clarification ([D.I. 6458](#), filed 10/01/21); and
- b) Omnibus Limited Objection of the Coalition of Abused Scouts for Justice to Motions for Rule 2004 Discovery ([D.I. 6460](#), filed 10/01/21).

Related Pleadings: None.

Status: A notice of withdrawal has been filed. No hearing is necessary.

3. (WITHDRAWN) Motion of "John Doe" to Permit Filing of Proof of Claim After Bar Date ([D.I. 6366](#), filed 9/27/21).

Objection Deadline: October 12, 2021, at 4:00 p.m. (Eastern Time).

Responses Received: None.

Related Pleadings: None.

Status: A notice of withdrawal has been filed. No hearing is necessary.

MATTERS GOING FORWARD

4. Moving Insurers' Motion to Compel Documents Withheld by Eric Green and Resolutions, LLC for the Disclosure Statement Hearing ([D.I. 6282](#), filed 9/17/21).

Objection Deadline: Not Applicable.

Responses Received:

- a) Letter to the Honorable Laurie Selber Silverstein objecting to Moving Insurers' Motion to Compel Documents withheld by Eric Green ([D.I. 6299](#), filed 9/20/21).

Related Pleadings:

- a) Declaration of Salvatore Cocchiaro in Support of Moving Insurers' Motion to Compel Documents Withheld by Eric Green and Resolutions, LLC on the Basis of Mediation Privilege ([D.I. 6283](#), filed 9/17/21); and
- b) Reply in Further Support of Moving Insurers' Motion to Compel Documents Withheld by Eric Green on the Basis of an Alleged Mediation Privilege ([D.I. 6316](#), filed 9/20/21).

Status: This matter is going forward.

5. Debtors' Motion for Protective Order and Related Relief ([D.I. 6288](#), filed 9/17/21).

Objection Deadline: October 1, 2021, at 4:00 p.m. (Eastern Time); objection deadline extended for certain insurers to October 5, 2021, at 4:00 p.m. (Eastern Time).

Responses Received:

- a) Objection of the Tort Claimants' Committee to Debtors' Motion for Protective Order and Related Relief ([D.I. 6457](#), filed 10/01/21);
- b) Joinder of the Zalkin Law Firm, P.C. and Pfau Cochran Vertetis Amala PLLC to the Objection of the Tort Claimants' Committee to Debtors' Motion for Protective Order and Related Relief ([D.I. 6459](#), filed 10/01/21);
- c) Certain Insurers' Objection to Debtors' Motion for Protective Order and Related Relief ([D.I. 6495](#), filed 10/05/21);
- d) Declaration of Daniel Shamah in Support of Certain Insurers' Objection to Debtors' Motion for Protective Order and Related Relief ([D.I. 6496](#), filed 10/05/21);
- e) Objection of the AIG Companies to Debtors' Motion for Protective Order and Related Relief ([D.I. 6497](#), filed 10/05/21);
- f) Joinder of Argonaut Insurance Company's Joinder to Certain Insurers' Objection to Debtors' Motion for Protective Order and Related Relief ([D.I. 6498](#), filed 10/05/21);
- g) Joinder of Arch Insurance Company to Certain Insurers' Objection to Debtors' Motion for Protective Relief ([D.I. 6524](#), filed 10/08/21); and

- h) Joinder of Trader and Pacific Insurance Company, Endurance American Specialty Insurance Company, and Endurance American Insurance Company to Certain Insurers' Objection to Debtors' Motion for Protective Order and Related Relief ([D.I. 6610](#), filed 10/14/21).

Related Pleadings:

- a) Notice of Filing of Privilege Log ([D.I. 6453](#), filed 9/30/21);
- b) Notice of Filing of Certification of Counsel Regarding Debtors' Motion for Protective Order and related Relief ([D.I. 6454](#), filed 9/30/21);
- c) Debtors' Omnibus Reply to the Objections by the Tort Claimants' Committee, Century, and AIG, to the Debtors' Motion for Protective Order and Related Relief ([D.I. 6631](#), filed 10/15/21); and
- d) Notice of Filing of Revised Proposed Order Regarding Debtors' Motion for Protective Order and Related Relief ([D.I. 6634](#), filed 10/15/21).

Status: This matter is going forward.

- 6. [SEALED] Motion of Paul Mones, P.C. to Withdraw as Counsel to Claimant Number SA-59066 (D.I. 6309, filed 9/20/21).

Objection Deadline: October 4, 2021, at 4:00 p.m. (Eastern Time).

Responses Received:

- a) [SEALED] *Ex Parte* Response to Motion by Paul Mones (D.I. 6488, filed 10/05/21);
- b) [Redacted] *Ex Parte* Response to Motion by Paul Mones ([D.I. 6489](#), filed 10/05/21);
- c) [SEALED] *Ex Parte* Response to Motion by Paul Mones P.C. (D.I. 6602, filed 10/13/21); and
- d) [Redacted] *Ex Parte* Response to Motion by Paul Mones ([D.I. 6603](#), filed 10/13/21).

Related Pleadings: None.

Status: This matter is going forward.

- 7. Motion of Zurich Insurers for Authority to Join in Rule 2004 Subpoenas or, in the Alternative, Issue Identical Subpoenas as Previously Served by Other Insurers Relating to Claims Aggregators ([D.I. 6342](#), filed 9/22/21).

Objection Deadline: October 6, 2021, at 4:00 p.m. (Eastern Time).

Responses Received:

- a) Joinder of Clarendon National Insurance Company, as Successor by Merger to Clarendon America Insurance Company, American General Fire & Casualty Company, Maryland American General Group, and Maryland Casualty Company to the Zurich Insurers' Motion for Authority to Join in Rule 2004 Subpoenas or, in the Alternative, Issue Identical Subpoenas as Previously Served by Other Insurers Relating to Claims Aggregators ([D.I. 6426](#), filed 9/29/21);
- b) Objection of the Coalition of Abused Scouts for Justice to Century Motion for Clarification ([D.I. 6458](#), filed 10/01/21); and
- c) Omnibus Limited Objection of the Coalition of Abused Scouts for Justice to Motions for Rule 2004 Discovery ([D.I. 6460](#), filed 10/01/21).

Related Pleadings: None.

Status: This matter is going forward.

- 8. Motion of Paul Mones, P.C. for Entry of an Order Authorizing Paul Mones, P.C. to File Under Seal its Motion to Withdraw as Counsel to Claimant Number SA-59066 and Exhibits ([D.I. 6343](#), filed 9/22/21).

Objection Deadline: Not Applicable.

Responses Received: None.

Related Pleadings: None.

Status: This matter is going forward.

- 9. 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.

Responses Received:

- a) Century's Objection to Marc J. Bern & Partners' Motion to Quash Supboena to Produce Documents Issued to KLS Legal Solutions LLC ([D.I. 6598](#), filed 10/12/21).

Related Pleadings: None.

Status: This matter is going forward.

10. Debtors' Motion for Leave to File Debtors' Omnibus Reply to the Objections by the Tort Claimants' Committee, Century, and AIG, to the Debtors' Motion for Protective Order and Related Relief ([D.I. 6632](#), filed 10/15/21).

Objection Deadline: At the October 19, 2021 hearing.

Responses Received: None.

Related Pleadings: None.

Status: This matter is going forward.

11. Motion for Leave to Exceed the Page Limit Regarding Debtors' Omnibus Reply to the Objections by the Tort Claimants' Committee, Century, and AIG, to Debtors' Motion for Protective Order and Related Relief ([D.I. 6633](#), filed 10/15/21).

Objection Deadline: At the October 19, 2021 hearing.

Responses Received: None.

Related Pleadings: None.

Status: This matter is going forward.

Dated: October 15, 2021  
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

*/s/ Paige N. Topper*

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