

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

In re: BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC, ¹ Debtors.	Chapter 11 Bankruptcy Case No. 20-10343 (LSS) Jointly Administered
FUTURE CLAIMANTS' REPRESENTATIVE, et al., Petitioners, v. BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC, Respondents.	Case No. 21-cv-00392 (RGA)

**STIPULATION WITH REGARD TO MOTION OF THE
FCR, TCC, AND COALITION FOR ENTRY OF AN ORDER
WITHDRAWING THE REFERENCE OF PROCEEDINGS
INVOLVING THE ESTIMATION OF PERSONAL INJURY CLAIMS**

WHEREAS, on March 17, 2021, James L. Patton, Jr., the Future Claimants' Representative (the "FCR"), the Official Committee of Tort Claimants (the "TCC"), and the Coalition of Abused Scouts for Justice (the "Coalition") (collectively, the "Movants"), filed the *Motion of the Future Claimants' Representative, the Official Committee of Tort Claimants, and the Coalition of Abused Scouts for Justice for Entry of an Order, Pursuant to 28 U.S.C. § 157(d) and Bankruptcy Rule 5011(a), Withdrawing the Reference of Proceedings Involving the Estimation of Personal Injury Claims* (the "Motion") with the United States Bankruptcy Court

¹ The Debtors in these 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.

for the District of Delaware (the “Bankruptcy Court”). The Motion was subsequently docketed in the United States District Court for the District of Delaware (the “District Court”).

WHEREAS, on March 29, 2021, the Movants served the Motion on the certain parties, which date shall be the date the Motion was deemed served on all parties under Local Rule 7.1.2(b). Copies of the Motion are available for review and download free of charge on the website maintained by the Debtors’ Claims, Noticing, and Solicitation Agent, Omni Agent Solutions, at <https://omniagentsolutions.com/BSA>.

IT IS HEREBY STIPULATED AND AGREED, by and between the parties for the undersigned counsel as follows:

- (1) the time for any party to file a response to the Motion shall be **April 15, 2021**; and
- (2) the time for the Movants to file a reply shall be **April 22, 2021**.

Dated: March 31, 2021

By: /s/ Stamatios Stamoulis
Stamatios Stamoulis (#4606)

STAMOULIS & WEINBLATT LLC
800 N. West Street
Third Floor
Wilmington, Delaware 19801
Telephone: 302 999 1540

O’MELVENY & MYERS LLP
Tancred Schiavoni (*pro hac vice*)
Times Square Tower
7 Times Square
New York, New York 10036-6537
Telephone: 212 326 2000

Counsel for Century Indemnity Company

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Derek C. Abbott

Derek C. Abbott (No. 3376)
Andrew R. Remming (No. 5120)
Eric W. Moats (No. 6441)
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@mnat.com
aremring@mnat.com
emoats@mnat.com
ptopper@mnat.com

WHITE & CASE LLP

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

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

Counsel for the Debtors and Debtors in Possession

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Robert S. Brady

Robert S. Brady (Bar No. 2847)
Edwin J. Harron (Bar No. 3396)
Sharon M. Zieg (Bar No. 4196)
Rodney Square
1000 North King Street
Wilmington, Delaware 19801

Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: rbrady@ycst.com
eharron@ycst.com
szieg@ycst.com

Counsel to the Future Claimants' Representative

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill

James I. Stang (CA Bar No. 94435)
Iain A.W. Nasatir (CA Bar No. 148977)
John A. Morris (NY Bar No. 2405397)
James E. O'Neill (DE Bar No. 4042)
John W. Lucas (CA Bar No.271038)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: jstang@pszjlaw.com
inasatir@pszjlaw.com
jmorris@pszjlaw.com
joneill@pszjlaw.com
jlucas@pszjlaw.com

Counsel for the Tort Claimants' Committee

MONZACK MERSKY AND BROWDER, P.A.

/s/ Rachel B. Mersky

Rachel B. Mersky (DE No. 049)
1201 North Orange Street, Suite 400
Wilmington, Delaware 19801
Telephone: (302) 656-8162
Email: mersky@monlaw.com

BROWN RUDNICK LLP

David J. Molton, Esq.
Eric R. Goodman, Esq.
Seven Times Square
New York, NY 10036
Telephone: (212) 209-4800

Email: dmolton@brownrudnick.com
Email: egoodman@brownrudnick.com

ROBBINS, RUSSELL, ENGLERT, ORSECK,
UNTEREINER & SAUBER LLP

Lawrence S. Robbins
Ariel N. Lavinbuk
William J. Trunk
Joshua S. Bolian
2000 K Street NW, 4th Floor
Washington, DC 20006
Telephone: 202-775-4500
Email: lrobbins@robbinsrussell.com
alavinbuk@robbinsrussell.com
wtrunk@robbinsrussell.com
jbolian@robbinsrussell.com

*Counsel to the Coalition of Abused Scouts for
Justice*

BAYARD, P.A.

/s/ Erin R. Fay

Erin R. Fay (No. 5268)
Gregory J. Flasser (No. 6154)
600 North King Street, Suite 400
Wilmington, Delaware 19801
Telephone: (302) 655-5000
Email: efay@bayardlaw.com
gflasser@bayardlaw.com

SHIPMAN & GOODWIN LLP

James P. Ruggeri
Joshua D. Weinberg
1875 K Street, NW, Suite 600
Washington, D.C. 20003
Tel: (202) 469-7750
Email: Ruggeri@goodwin.com
JWeinberg@goodwin.com

WILMER CUTLER PICKERING
HALE AND DORR LLP

Philip D. Anker
7 World Trade Center
250 Greenwich Street
New York, N.Y. 10007

Tel: (212) 230-8890
Email: philip.anker@wilmerhale.com

Danielle Spinelli
Joel Millar
1875 Pennsylvania Avenue N.W.
Washington, D.C. 20006
Tel: (202) 663-6000
Email: danielle.spinelli@wilmerhale.com
joel.millar@wilmerhale.com

*Attorneys for First State Insurance
Company, Hartford Accident and
Indemnity Company and Twin City
Fire Insurance Company*

APPROVED AND SO ORDERED

BY THE COURT:

Honorable Richard G. Andrews