

**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 DEPOSITION OF SEAN HIGGINS

**TO: Sean Higgins, Andrews & Thornton, Attorneys at Law
c/o Lawrence S. Robbins, Robbins, Russell, Englert, Orseck & Untereiner LLP
2000 K Street, NW, 4th Floor Washington, DC 20006
Phone: (202) 775-4501
Email: lrobbins@robbinsrussell.com**

PLEASE TAKE NOTICE THAT pursuant to Rule 30 of the Federal Rules of Civil Procedure, made applicable to these proceedings by Rules 9014 and 7030 of the Federal Rules of Bankruptcy Procedure, the American Zurich Insurance Company, American Guarantee and Liability Insurance Company, and Steadfast Insurance Company (collectively, “Zurich Insurers”) shall take the deposition of Sean Higgins in connection with the *Modified Fifth Amended Chapter 11 Plan Of Reorganization For Boy Scouts Of America And Delaware BSA, LLC* (Dkt No. 6443).

The deposition will commence on December 3, 2021 at 9:00 a.m. (Prevailing Pacific Time) via Zoom via a link to be circulated in advance. The deposition shall continue from day-to-day (Saturdays, Sundays, and holidays excluded), or as otherwise agreed by the parties, until completed. The deposition shall be taken upon oral examination before an officer authorized by law to administer oaths via remote video conference, and will be recorded by videographer and/or by stenographic means.

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.

PLEASE TAKE FURTHER NOTICE THAT:

1. The deposition will be conducted either in person or remotely, using audio-visual conference technology;
2. The court reporter will either report the deposition from the same location as the witness or a location separate from the witness and will remotely administer the oath to the witness;
3. Counsel for the parties and their clients will participate either from the same location or from separate locations;
4. The witness may be required to provide government-issued identification, which must be legible on camera;
5. Each participating attorney may be visible to all other participants, and their statements will be audible to all participants;
6. All exhibits will be provided simultaneously and, if the deposition is conducted remotely, electronically to the witness and all participants;
7. The court reporter will record the testimony;
8. The deposition may be recorded by stenographic, electronic, and/or visual means;
and
9. Counsel for all parties will be required to stipulate on the record their consent to this manner of deposition and their waiver of any objection to this manner of taking the deposition, including any objection to the admissibility at trial of this testimony based on the manner of remote deposition taking.

Dated: December 1, 2021
Wilmington, Delaware

By: /s/ Robert D. Cecil, Jr.

Robert D. Cecil, Jr. (No. 5317)
TYBOUT, REDFEARN & PELL
501 Carr Road, Suite 300
Wilmington, Delaware 19809
Phone: (302) 658-6901
E-mail: rcecil@trplaw.com

Kelly T. Currie (admitted pro hac vice)
CROWELL & MORING LLP
590 Madison Ave., 20th Floor
New York, NY 10022
Phone: (202) 624-2500
Email: kcurrie@crowell.com

*Attorneys for American Zurich Insurance
Company, American Guarantee and Liability
Insurance Company, and Steadfast Insurance
Company*

**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)

CERTIFICATE OF SERVICE

I, Robert D. Cecil, Jr., Esquire, hereby certify that on December 1, 2021, I caused a copy of *Notice of Deposition of Sean Higgins*, to be filed through the Court's Case Management/Electronic Case File ("CM/ECF") and served on all parties who have electronically entered a notice of appearance through the notice of filing generated by the Court's CM/ECF System. I further certify that I have served via email the foregoing document upon the following parties listed on Exhibit A attached hereto.

Dated: December 1, 2021
Wilmington, Delaware

By: /s/ Robert D. Cecil, Jr.
Robert D. Cecil, Jr. (No. 5317)
TYBOUT, REDFEARN & PELL
501 Carr Road, Suite 300
Wilmington, Delaware 19809
Phone: (302) 658-6901
E-mail: rcecil@trplaw.com

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.

EXHIBIT A

BSA

Jessica C. Lauria	jessica.lauria@whitecase.com
Michael C Andolina	mandolina@whitecase.com
Matthew Linder	mlinder@whitecase.com
Laura E. Baccash	laura.baccash@whitecase.com
Blair M. Warner	blair.warner@whitecase.com
Samuel Hershey	sam.hershey@whitecase.com
Glenn Kurtz	gkurtz@whitecase.com
Robert Tiedemann	rtiedemann@whitecase.com
Andrew Hammond	ahammond@whitecase.com
Jennifer Thomas	Jennifer.thomas@whitecase.com
Derek Abbott	DAbbott@morrisnichols.com
Andrew Remming	aremming@morrisnichols.com
Paige Topper	ptopper@morrisnichols.com
Tori Remington	tremington@morrisnichols.com
Ernest Martin	Ernest.Martin@haynesboone.com
Adrian Azer	Adrian.Azer@haynesboone.com

U.S. Trustee

David L. Buchbinder	david.l.buchbinder@usdoj.gov
Hanna Mufson McCollum	hannah.mccollum@usdoj.gov

Tort Claimants' Committee

James Stang	jstang@pszjlaw.com
Rob Orgel	rorgel@pszjlaw.com
John A. Morris	jmorris@pszjlaw.com
John W. Lucas	jllucas@pszjlaw.com
Linda Cantor	lcantor@pszjlaw.com
James O'Neill	joneill@pszjlaw.com
Debra Grassgreen	dgrassgreen@pszjlaw.com
Ken Brown	kbrown@pszjlaw.com
Malhar S. Pagay	mpagay@pszjlaw.com

Ad Hoc Committee of Local Councils

Richard G. Mason	RGMason@WLRK.com
Douglas K. Mayer	DKMayer@WLRK.com
Joseph C. Celentino	JCCelentino@WLRK.com
Mitchell Levy	MSLevy@wlrk.com

Creditors' Committee

Thomas Moers Mayer	TMayer@kramerlevin.com
Rachael Ringer	rringer@kramerlevin.com

Jennifer Sharret	jsharret@kramerlev.com
Megan Wasson	mwasson@kramerlevin.com
Natan Hammerman	nhamerman@kramerlevin.com
Mark Eckar	meckard@reedsmith.com
Kurt Gwynne	kgwynne@reedsmith.com

Future Claimants' Representative

Robert Brady	rbrady@ycst.com
Edwin Harron	eharron@ycst.com
Sharon Zieg	szieg@ycst.com
Erin Edwards	eedwards@ycst.com
Kenneth Enos	kenos@ycst.com
Kevin Guerke	kguerke@ycst.com
Ashley Jacobs	ajacobs@ycst.com
Jared Kochenash	jkochenash@ycst.com
Sara Beth Kohut	skohut@ycst.com
Rachel Jennings	jenningsr@gilbertlegal.com
Meredith Neely	neelym@gilbertlegal.com
Kami Quinn	quinnk@gilbertlegal.com
W. Hunter Winstead	winsteadh@gilbertlegal.com
Emily Grim	grime@gilbertlegal.com

Coalition of Abused Scouts for Justice

D. Cameron Moxley	cmoxley@brownrudnick.com
David Molton	dmolton@brownrudnick.com
Tristan Axelrod	taxelrod@brownrudnick.com
Barbara J. Kelly	bkelly@brownrudnick.com
Gerard Cicero	gcicero@brownrudnick.com
Eric Goodman	egoodman@brownrudnick.com
Rachel Merksy	rmersky@monlaw.com

JPMorgan Chase Bank, N.A.

Kristian Gluck	kristian.gluck@nortonrosefulbright.com
John Heath	john.heath@nortonrosefulbright.com
Sarah Cornelia	sarah.corneila@nortonrosefulbright.com

Steven Zelin	zelin@pjtpartners.com
John Singh	singhj@pjtpartners.com
Scott Meyerson	meyerson@pjtpartners.com
Lukas Schwarzmman	lukas.schwarzmman@pjtpartners.com

The Church of Jesus Christ of Latter-day Saints, a Utah Corporation

Jeff Bjork	jeff.bjork@lw.com
Robert Malioneck	Robert.malioneck@lw.com

Deniz Irgi	deniz.irgi@lw.com
Adam Goldberg	adam.goldberg@lw.com
Blake Denton	Blake.Denton@lw.com
Amy Quartarolo	Amy.Quartarolo@lw.com
Benjamin Dozier	Benjamin.Butzin-Dozier@lw.com
Sohom Datta	Sohom.Datta@lw.com
Natasha Bronn Schrier	natasha.bronnschrier@lw.com
Ryan Jones	ryan.jones@lw.com
Michael Merchant	merchant@rlf.com
Brett Haywood	haywood@rlf.com

United Methodist Ad Hoc Committee

Ed Rice	erice@bradley.com
Elizabeth Brusa	ebrusa@bradley.com
Jeremy Ryan	jryan@potteranderson.com
D. Ryan Slaugh	rslaugh@potteranderson.com

Roman Catholic Ad Hoc Committee Catholic Mutual Relief Society of America

Everett Cygal	ecygal@schiffhardin.com
Mark Fisher	mfisher@schiffhardin.com
Daniel Schufreider	dschufreider@schiffhardin.com
Jin Yan	jyan@schiffhardin.com
Jeremy Ryan	jryan@potteranderson.com

The Episcopal Church and Domestic and Foreign Missionary Society of the Protestant Episcopal Church in the United States of America

Mark Salzberg	mark.salzberg@squirepb.com
---------------	----------------------------

Roman Catholic Diocese of Brooklyn, New York, Roman Catholic Archbishop of Los Angeles, a corporation sole, Roman Catholic Diocese of Dallas, a Texas nonprofit corporation, Archdiocese of Galveston-Houston, and Diocese of Austin

Patrick A. Jackson	patrick.jackson@faegredrinker.com
Ian J. Bambrick	ian.bambrick@faegredrinker.com

Zalkin Law Firm, P.C. and Pfau Cochran Vertetis Amala PLLC, representative group for various state court counsel

Daniel Bussel	dbussel@ktbslaw.com
Thomas Patterson	tpatterson@ktbslaw.com
Sasha Gurvitz	sgurvitz@ktbslaw.com
Robert Pfister	rpfister@ktbslaw.com

Agricultural Insurance Company

Bruce W. McCullough	bmccullough@bodellbove.com
Bruce D. Celebrezze	bruce.celebrezze@clydeco.us

Conrad Krebs
David Christian

Konrad.drebs@clydeco.us
dchristian@dca.law

AIG (National Union Fire Insurance Company, Lexington Insurance Company, Landmark Insurance Company, and the Insurance Company of the State of Pennsylvania)

Susan Gummow	sgummow@fgppr.com
Tracey Jordan	tjordan@fgppr.com
Michael Rosenthal	mrosenthal@gibsondunn.com
Deirdre Richards	drichards@finemanlawfirm.com
Matthew Bouslog	mbouslog@gibsondunn.com
James Hallowell	jhallowell@gibsondunn.com
Keith Martorana	kmartorana@gibsondunn.com
Vincent Eisinger	veisinger@gibsondunn.com

Allianz Global Risks US Insurance Company

Ryan Smethurst	rsmethurst@mwe.com
Margaret Warner	mwarner@mwe.com
Matthew S. Sorem	msorem@nicolaidesllp.com

American Zurich Insurance Company

Mark Plevin	MPlevin@crowell.com
Tacie Yoon	TYoon@crowell.com
Rachel Jankowski	RJankowski@crowell.com
Robert Cecil	Rcecil@trplaw.com

Argonaut Insurance Company and Colony Insurance Company

Laura Archie	laura.archie@argogroupus.com
Paul Logan	plogan@postschell.com
Kathleen K. Kerns	kkerns@postschell.com
George R. Calhoun	george@ifrahlaw.com

Arrowood Indemnity Company

Michael Hrinewski	mhrinewski@coughlinduffy.com
Lorraine Armenti	larmenti@coughlinduffy.com

Aspen Insurance Holdings Limited

Clay Wilson	cwilkerson@brownsims.com
-------------	--------------------------

AXA XL

Jonathan Mulvihill	jonathan.mulvihill@axaxl.com
Lloyd A. Gura	lgura@moundcotton.com
Pamela Minetto	pminetto@moundcotton.com

Ategrity Specialty

John Morgenstern
Matthew Szwajkowski
Carl "Chuck" Kunz, III

jmorgenstern@ohaganmeyer.com
mszwajkowski@ohaganmeyer.com
ckunz@morrisjames.com

Berkley Custom

John Baay

jbaay@glllaw.com

Berkeley Research Group

Matthew Babcock

MBabcock@thinkbrg.com

Clarendon America Insurance Company

Kenya Spivey
Harry Lee
Brett Grindrod
John O'Connor
Nailah Ogle
Matthew Summers

Kenya.Spivey@enstargroup.com
hlee@steptoe.co
bgrindrod@steptoe.com
joconnor@steptoe.com
nogle@steptoe.com
SummersM@ballardspahr.com

Century Indemnity Company

Stamatios Stamoulis
Richard Weinblatt
Tancred Schiavoni
Salvatore J. Cocchiaro

Stamoulis@swdelaw.com
weinblatt@swdelaw.com
tschiavoni@omm.com
scocchiaro@omm.com

CNA

Laura McNally
Emily Stone

lmcnally@loeb.com
estone@loeb.com

General Star Indemnity

Gary P. Seligman
Ashley L. Criss

gseligman@wiley.law
acriss@wiley.law

Hartford

James P. Ruggeri
Abigail W. Williams
Joshua D. Weinberg
Annette Rolain
Sara Hunkler
Phil Anker
Danielle Spinelli
Joel Millar
Lauren Lifland
Benjamin Loveland

JRuggeri@goodwin.com
AWilliams@goodwin.com
JWeinberg@goodwin.com
arolain@goodwin.com
shunkler@goodwin.com
Philip.Anker@wilmerhale.com
Danielle.Spinelli@wilmerhale.com
Joel.Millar@wilmerhale.com
lauren.lifland@wilmerhale.com
Benjamin.loveland@wilmerhale.com

Erin Fay efay@bayardlaw.com
Gregory Flasser gflasser@bayardlaw.com
Eric Goldstein egoldstein@goodwin.com

Liberty Mutual

Douglas R. Gooding dgooding@choate.com
Jonathan Marshall jmarshall@choate.com
Kim V. Marrkand KMarrkand@mintz.com

Markel

Russell Dennis russell.dennis@markel.com
Jessica O'Neill Jessica.oneill@markel.com
Michael Pankow MPankow@BHFS.com

Maryland Casualty Company, Maryland American General Group, and American General Fire & Casualty Company

Harry Lee HLee@steptoe.com
Brett Grindod bgrindod@steptoe.com
Nailah Ogle nogle@steptoe.com

Munich Re

Thaddeus Weaver tweaver@dilworthlaw.com
William McGrath wmcgrath@dilworthlaw.com

National Surety

Todd C Jacobs TJacobs@bradleyriley.com
John E. Bucheit jbucheit@bradleyriley.com
David M. Caves dcaves@bradleyriley.com
Harris B. Winsberg harris.winsberg@troutman.com
David Fournier david.fournier@troutman.com
Marcy Smith marcy.smith@troutman.com

Old Republic Insurance Company

Thomas Dare tdare@oldrepublic.com
Peg Anderson panderson@foxswibel.com
Adam Hachikian ahachikian@foxswibel.com
Kenneth Thomas kthomas@foxswibel.com
Ryan Schultz rschultz@foxswibel.com
Stephen Miller smiller@morrisjames.com
Carl Kunz, III ckunz@morrisjames.com

Traders and Pacific Insurance Company, Endurance American Specialty Insurance Company, and Endurance American Insurance Company

Joseph Ziemianski jziemianski@cozen.com

Marla Benedek mbenedek@cozen.com

Travelers

Scott Myers SPMyers@travelers.com
Louis Rizzo lrizzo@regerlaw.com

Notice of Intent Parties

Lujan Claimants

Delia Lujan Wolff dslwolff@lawguam.com
Christopher Loizides loizides@loizides.com

Kentucky Creditors: N.C., K.W., C.F.,B.L., A.F. and A.S.

Raeann Warner raeann@jcdelaw.com
Louis Schneider lou.schneider@thomaslawoffices.com
Tad Thomas tad@thomaslawoffices.com

Crew Janci Claimants

Salle Veghte sveghte@klehr.com
Morton Branzburg mbranzburg@klehr.com
Peter Janci peter@crewjanci.com

Hurley McKenna & Mertz Survivors (HMM)

Sally Veghte sveghte@klehr.com
Christopher Hurley churley@hurley-law.com
Evan Smola esmola@hurley-law.com

Lonnie Washburn (*Pro Se*)²

Frank Schwindler (*Pro Se*) nundawao@gmail.com

Gillispie Claimants

Sally Veghte sveghte@klehr.com
Joshua Gillispie josh@greenandgillispie.com
Morton Branzburg mbranzburg@klehr.com

Arch Insurance Company

Kathleen Miller kmiller@skjlaw.com
Matthew Hamermesh mah@hangle.com
Ronald Schiller rschiller@hangle.com
Sharon McKee smckee@hangle.com
Elizabeth Dolce edolce@hangle.com

² Contact information for the *pro se* individuals has been provided to the Participating Parties.

Jane Doe

Mark L. Desgrosseilliers
Cindy L. Robinson
Douglas Mahoney

desgross@chipmanbrown.com
crobinson@robinsonmahoney.com
dmahoney@robinsonmahoney.com

ASK LLP

Lawrence Robbins
William Trunk
Anthony M. Saccullo
Mary E. Augustine

lrobbins@robbinsrussell.com
wtrunk@robbinsrussell.com
ams@saccullolegal.com
meg@saccullolegal.com

Andrews & Thornton

Lawrence Robbins
William Trunk
Anthony M. Saccullo
Mary E. Augustine

lrobbins@robbinsrussell.com
wtrunk@robbinsrussell.com
ams@saccullolegal.com
meg@saccullolegal.com

Kosnoff Law

David E. Wilks

dwilks@wilks.law

Napoli Shkolnik PLLC

Brett Bustamante

BBustamante@NapoliLaw.com

AVA Law

Joseph Grey

jgrey@crosslaw.com

Krause & Kinsman

Bernard Conaway

bgc@conaway-legal.com

Slater Slater Schulman LLP

Michael Trentin
Justin Alberto
Michael Klauder
Seth Van Aalten
Brooke Fink

MTrentin@coleschotz.com
JAlberto@coleschotz.com
MKlauder@coleschotz.com
SVanAalten@coleschotz.com
BFink@coleschotz.com

Eisenberg, Rothweiler, Winkler, Eisenberg & Jeck, P.C.

Daniel Hogan
Gabrielle Durstein

dan@dkhogan.com
gdurstein@dkhogan.com

Mark Eveland, Chief Executive Officer of Verus LLC

Michael A. Kaplan
Rasmeet K. Chahil
Sally E. Veghte

mkaplan@lowenstein.com
rchahil@lowenstein.com
SVeghte@klehr.com