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James E. O'Neill

August 20, 2021

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Via E-mail and ECF Filing

The Honorable Laurie Selber Silverstein
United States Bankruptcy Judge
United States Bankruptcy Court for
the District of Delaware
824 North Market Street, 6th Floor
Wilmington Delaware 19801

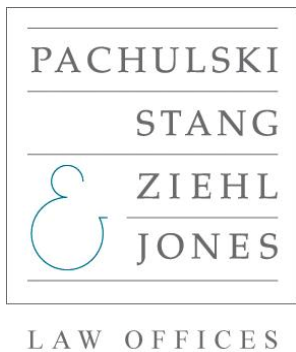
Re: In re Boy Scouts of America and Delaware BSA, LLC, Case No. 20-10343

Dear Judge Silverstein:

On May 28, 2021, the Official Committee of Tort Claimants (the “TCC”) of the above-referenced debtors (the “Debtors”), the Coalition of Abused Scouts for Justice (the “Coalition”), and the Future Claimants’ Representative (collectively with the TCC and the Coalition, the “Movants”) wrote to this Court seeking an order compelling Century Indemnity Company (“Century”) and Chubb Group Holdings (“Chubb” and collectively with Century, the Insurers) to produce certain documents (the “Documents”) related to (i) the 1995 and 1996 restructuring of INA Financial Corporation of North America (“INA”) and its subsidiaries and (ii) the financial condition of each entity (including Century, Chubb, and any related entities) that is financially responsible for the liabilities arising under the certain policies issued by INA that the Debtors are proposing to contribute to the Settlement Trust.¹ A copy of the May 26, 2021 letter [ECF No. 5057] is attached hereto as **Exhibit A**.

On July 30, 2021, the Movants wrote to this Court again and renewed their request that the Insurers be compelled to produce the

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the *Debtors’ Fourth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America Inc. and Delaware BSA, LLC* [Docket No. 5484] dated July 7, 2021 (the “Plan”).



The Honorable Laurie Selber Silverstein
August 20, 2021
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Documents. A copy of the July 30, 2021 letter [ECF No. 5835] is attached hereto as **Exhibit B**.

Despite the Movants' letters to this Court and our attempts inside and outside of mediation to obtain the requested information, the Insurers have continued to refuse to produce the Documents, in the absence of an order from this Court compelling them to do so. As set forth in our prior letters to the Court, these Documents are critical to the Survivors' ability to evaluate the Plan and the funding of the Settlement Trust contemplated therein.

Accordingly, we respectfully request that this Court schedule a conference to discuss this discovery dispute. In the event that the Court declines to set a conference, in light of timing of this case, we respectfully request that the Court set a date for a motion to compel to be heard as soon as possible.

Respectfully submitted,

Brown Rudnick LLP

Pachulski Stang Ziehl &
Jones LLP

Young Conaway
Stargatt & Taylor, LLP

/s/ David J. Molton
Counsel to the Coalition of
Abused Scouts for Justice

/s/ James O'Neill
Counsel to the Official
Committee of Tort
Claimants

/s/ Robert S. Brady
Counsel to the Future
Claimants'
Representative

JEO

Attachments

cc: Stamatios Stamoulis, Esq. (*via email*)
Tancred Schiavoni, Esq. (*via email*)

EXHIBIT A

brownrudnick

ERIC R. GOODMAN
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May 26, 2021

The Honorable Laurie Selber Silverstein
United States Bankruptcy Judge
United States Bankruptcy Court for the District of
Delaware
824 North Market Street, 6th Floor
Wilmington, Delaware 19801

RE: In re Boy Scouts of America and Delaware BSA, LLC, Case No. 20-10343

Dear Judge Silverstein:

The Official Committee of Tort Claimants (the “TCC”), the Coalition of Abused Scouts for Justice (the “Coalition”), and James L. Patton, the Future Claimants’ Representative (the “FCR” and together with the TCC and the Coalition, the “Movants”) write the Court respectfully to seek an order compelling Century Indemnity Company (“Century”) and Chubb Group Holdings, Inc. (“Chubb”) to produce documents related to (i) the 1995 and 1996 restructuring of INA Financial Corporation and its subsidiaries and (ii) the financial condition of each entity (including Century, Chubb, and any related entities) that is financially responsible for the liabilities arising under the INA Policies that the Debtors are proposing to contribute to the Settlement Trust (the “Documents”).

One of the insurance carriers with significant coverage obligations for Abuse Claims is the Insurance Company of North America (“INA”). In the 1990s, INA Financial Corporation and its subsidiaries (which included INA) underwent a restructuring. As part of that restructuring, INA contends that its liabilities (including its coverage obligations for BSA Abuse Claims) were ascribed or assigned to Century. Century—a party that has appeared and actively participated in these proceedings—is an inactive run-off company (that is, a company with liabilities under historical insurance policies, but no ongoing business generating premiums and revenue). Neither the BSA nor any Local Councils approved of the restructuring or released INA. Even if INA’s liabilities were ascribed to Century, INA (an active insurance company and subsidiary of Chubb) is still liable. Century contends that it has a very limited ability to pay—substantially less than the amount that the INA Policies are obligated to pay. Chubb contends that even though the restructuring obligated it to pay substantial amounts regarding the INA-Century liabilities, and even though it has paid, pursuant to the restructuring and other arrangements, hundreds of millions of dollars into Century, it has no obligation to do so.

Certain documents related to the restructuring are public. The Debtors could have reviewed those in connection with the preparation of their Disclosure Statement and the Hartford Settlement. But some key documents relating to which entities are legally responsible to pay BSA’s liability are not public. The Movants believe that, among other Documents, the exhibits referenced in an order entered by the Pennsylvania Insurance Commissioner will shed light on this topic. Century and/or Chubb has these documents but will not produce them.



Furthermore, the restructuring plans were expressly made subject to the right of insureds to legally challenge the restructuring plan and arrangements. *See AICCO, Inc. v. Ins. Co. of N. Am.*, 90 Cal. App. 4th 579, 593 (2001) (“[W]hile the California Department of Insurance approved INA’s division, it did not purport to decide the legal consequences of the division. Indeed, the insurance department expressly said that its consent ‘does not foreclose creditors, including policyholders, from pursuing any remedy at law which may be available to them’” (quoting the Restructuring Agreement)). Thus, Century and Chubb are seeking to block challenges that the restructuring plan expressly recognized could be made—and should be made here.

It is critical that survivors understand the creditworthiness and ability to pay of Century and which entity or entities within the Chubb corporate family are liable for Abuse Claims. The INA Policies are among the key assets that the Debtors are proposing to contribute to the Settlement Trust under both the Global Resolution Plan and the Toggle Plan. If Century and Chubb are permitted to maintain their position without challenge, the result will be to deprive survivors and the Debtors themselves, of the real value of billions of dollars of insurance assets, forcing them to accept pennies on the dollar. Whether the Settlement Trust has sufficient funding for the Court to find that the Plan satisfies the requirements found in section 1129 of the Bankruptcy Code and applicable case law depends on the amounts that the Settlement Trust can reasonably expect to collect on account of the INA Policies. Depending on the answer to this question, various statements contained in the Disclosure Statement may be materially false and misleading.

Further, the Debtors’ proposed settlement with Hartford includes a reduction clause that makes Century’s willingness and ability to pay a key issue. *See* Docket No. 2624, Ex. A at § II.E. Pursuant to the “Century Clause,” if the Debtors (or the Settlement Trust) execute a settlement with Century for less than \$1.3 billion, the Hartford settlement will be reduced, dollar for dollar, by 50% of the difference between \$1.3 billion and the amount payable by Century. Survivors need to know whether it is reasonable to expect that they will achieve a \$1.3 billion or greater settlement with Century. The Debtors failed to conduct any diligence on these issues, but Movants do not believe that it is appropriate for the survivors to be similarly uninformed.

On April 23, 2021, the Movants served Century with discovery. And, on May 11, 2021, the Coalition served a subpoena on Chubb. The requests are straightforward. The Movants want to see the transaction documents pertaining to the INA restructuring so that they can determine for themselves which Chubb entities are liable for Abuse Claims. And, the Movants want information regarding Century’s financial condition and the financial condition of any other Chubb affiliate that is obligated to pay Abuse Claims. The Disclosure Statement is filled with representations that survivors will somehow be paid in full if the Global Resolution Plan is confirmed. The Movants doubt the veracity of such statements but seek discovery so that parties are not left guessing when the facts can be easily brought to light.

Century and Chubb have made it clear through their responses and attempts to meet and confer that they are unwilling to produce non-public documents in response to the Movants’ requests absent an order from this Court compelling them to do so. The parties are at a clear impasse. By this letter, the Movants seek to formally place this dispute before the Court.



The Honorable Laurie Selber Silverstein
May 26, 2021
Page 3

Sincerely,

Brown Rudnick LLP

Pachulski Stang Ziehl & Jones
LLP

Young Conaway Stargatt &
Taylor, LLP

/s/ David J. Molton
Counsel to the Coalition of
Abused Scouts for Justice

/s/ James Stang
Counsel to the Official
Committee of Tort Claimants

/s/ Edwin Harron
Counsel to the Future
Claimants' Representative

Monzack Mersky and Browder,
P.A.

Pasich LLP

Gilbert LLP

/s/ Rachel B. Mersky
Counsel to the Coalition of
Abused Scouts for Justice

/s/ Jeffrey L. Schulman
Counsel to the Official
Committee of Tort Claimants

/s/ Kami E. Quinn
Counsel to the Future
Claimants' Representative

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

In re:

BOY SCOUTS OF AMERICA AND
DELAWARE BSA, LLC

Debtors.

Chapter 11

Case No. 20-10343 (LSS)

(Jointly Administered)

CERTIFICATE OF SERVICE

I Rachel B. Mersky, hereby certify that on May 26, 2021, I served or caused to be served a copy of the foregoing Letter via email or first class mail upon all parties on the attached service list, and by CM/ECF upon those parties registered to received such electronic notifications in this case.

Dated: May 26, 2021
Wilmington, Delaware

MONZACK MERSKY & BROWDER, P.A.

/s/ Rachel B. Mersky

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*Co-Counsel to the Coalition of Abused Scouts for
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3	Abernathy, Roeder, Boyd & Hullett, P.C.								bankruptcy@abernathylaw.com	Larry R. Boyd	*NOA - Counsel to Collin County Tax Assessor/Collector
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54	Foran Glennon Planadach Ponzi & Rudloff, P.C.						312-863-5000	312-863-5000	ishleypak@fgppr.com	Igor Shleypak	*NOA - Counsel for National Union Fire Insurance Co of PA, A
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63	James, Vernon & Weeks, P.A.	Attn: Leander L. James	Attn: Craig K. Vernon	Attn: R. Charlie Beckett	1626 Lincoln Wy	Coeur d'Alene, ID 83815	208-667-0683	208-664-1684	ljames@jvwlaw.net	Leander L. James	*NOA - Counsel to Certain Tort Claimants
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68	Jpmorgan Chase Bank, NA	c/o Norton Rose Fulbright US LLP	Attn: Louis R. Strubeck, Jr	1301 Ave of the Americas	New York, NY 10019-6022		212-318-3159		louis.strubeck@nortonrosefulbright.com	Louis R. Strubeck, Jr	*NOA - Counsel for JPMorgan Chase Bank, National Association
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	A	B	C	D	E	F	G	H	I	J	K
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190	Womble Bond Dickinson (US) LLP	Attn: Matthew Ward/Morgan Patterson	1313 N Market St, Ste 1200	Wilmington, DE 19801			302-252-4320	302-252-4330	matthew.ward@wbd-us.com	Matthew P. Ward	*NOA - Counsel for JPMorgan Chase Bank, National Association
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EXHIBIT B

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July 30, 2021

The Honorable Laurie Selber Silverstein
United States Bankruptcy Judge
United States Bankruptcy Court for the District
of Delaware
824 North Market Street, 6th Floor
Wilmington, Delaware 19801

RE: In re Boy Scouts of America and Delaware BSA, LLC, Case No. 20-10343

Dear Judge Silverstein:

We write respectfully to renew our request for an order compelling Century Indemnity Company (“Century”) and Chubb Group Holdings, Inc. (“Chubb”) to produce certain documents sought by the Coalition, the TCC, and FCR from Century and Chubb. *See* D.I. 5057 (May 26, 2021 letter to Your Honor seeking order compelling production of documents).

In April and May, the Coalition, TCC, and FCR served discovery on Century and Chubb. The point of the discovery was clear. As Your Honor knows, the Hartford Settlement Agreement contains a clause that ties the amount Hartford must pay to buy back its insurance policies that cover Abuse Claims to a future settlement with Century. Based on deposition testimony, Hartford believes that this applies to any verdict or judgment obtained by Century regarding its BSA coverage obligations in litigation. If Century were to pay less than \$1.3 billion, then Hartford’s obligation would decrease based on the formula in the Hartford Settlement Agreement.

Publicly available financial information indicates that Century may lack the ability to pay the \$1.3 billion set out in the Hartford Settlement Agreement to buy back or otherwise settle its policies (even assuming such an amount constituted a reasonable settlement, which it does not). The policies were issued by the Insurance Company of North America (“INA”)—a subsidiary of Chubb. Chubb is clearly solvent. Without the information Chubb is refusing to disclose, we cannot determine which Chubb entity(ies) are potentially liable for Abuse Claims.

In addition, the Debtors are proposing to fund the Settlement Trust with insurance assets. For this Court to confirm a plan with nonconsensual third-party releases, the Court must find that the survivors are being paid in full or close thereto. Whether Century is solvent and which Chubb entity(ies) are potentially liable bears directly on whether the Court can confirm a plan that includes nonconsensual third-party releases. Whether a global resolution plan is confirmable may turn, as a factual matter, on the very information that Century and Chubb are



refusing to produce. ***Century and Chubb have stonewalled all efforts to obtain this information.***

After suggesting that they might produce documents in response to the requests, on July 6, 2021, Century and Chubb delivered eight boxes of hard-copy documents to Brown Rudnick's New York office. Century/Chubb made no effort to deliver any documents to the TCC or the FCR.

In response to this production, the Coalition's counsel asked Century and Chubb to comply with the instructions in the requests and produce the documents electronically in accordance with those instructions and the Federal Rules of Civil Procedure. The Coalition's counsel also asked Century/Chubb to produce the documents to the TCC and the FCR. To date, Century/Chubb have refused to produce any documents in electronic form. Nor has Century/Chubb produced any documents to the TCC or the FCR.

It gets worse. The Coalition inventoried the hard-copy production made by Century/Chubb. The production consists of the publicly available financial disclosures that the Coalition reviewed prior to issuing the discovery served in April 2021. Century/Chubb produced the very information that the Coalition had informed Century/Chubb's counsel that it had already reviewed prior to serving the discovery requests. Century has also refused to respond to discovery based on the mediation privilege. Century has alleged that financial information that it has apparently provided to the mediators—*i.e.*, information that exists independent of the Debtors' bankruptcy cases—is now shielded from production because it was provided to the mediators.

Century's tactics to delay discovery also include objecting to customary definitions as "overly broad" and "unduly burdensome," objecting to the use of terms used by Century in Century's own financial statements as being "vague and ambiguous," and offering nonsensical and circular responses to simple requests. For example, Century's response to the request for "[d]ocuments sufficient to show all liabilities Concerning the Debtors that Century assumed in connection with the 1996 Transaction" simply referred to the 1996 Order even though such Order does not identify any such liabilities. Likewise, Century refused to "[i]dentify the maximum amount that Century can pay for any Century Settlement" on the grounds that doing so would "undermine Century's ability to negotiate and mediate as directed by the Court." Apparently, Century believes that if it is required to disclose basic financial information, it will not be able to secure a favorable settlement for itself. The survivors deserve better than this.

Within the next few weeks, this Court will consider the Debtors' motion to approve the Restructuring Support Agreement ("RSA"). The RSA requires the Debtors to abandon their settlement with Hartford in favor of a plan that the survivor groups support. The Hartford Settlement will undoubtedly cast a shadow over the Court's consideration of the RSA as Hartford continues to argue that the Debtors would be better off trying to confirm a plan that includes the Hartford Settlement. Century/Chubb should not be permitted to continue to withhold the information sought as it may show that, assuming it is enforceable in the first instance, the Hartford Settlement may require Hartford to pay far less than \$650 million.



Further, if this issue is not addressed now, it will likely re-surface at plan confirmation when the Debtors seek the entry of a Confirmation Order that includes the Channeling Injunction.

Hartford has also refused to produce any documents related to the Hartford Settlement, asserting privilege as a basis for withholding all relevant information. In addition, Hartford's counsel repeatedly instructed Mr. John J. Kinney (the person who negotiated and signed the Hartford Settlement Agreement on Hartford's behalf) not to answer questions regarding the proposed settlement at his deposition, claiming privilege. Hartford's position is that its settlement is reasonable, but all information Hartford purportedly has in its possession, custody, or control that supports (or refutes) that opinion is shrouded by a claim of privilege and can be withheld on such basis.

We respectfully request that the Court issue an order compelling Century and Chubb to produce documents responsive to the discovery served on them months ago.

Respectfully submitted,

Brown Rudnick LLP

Pachulski Stang Ziehl &
Jones LLP

Young Conaway Stargatt &
Taylor, LLP

/s/ Eric Goodman
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Abused Scouts for Justice

/s/ Iain Nasatir
Counsel to the Official
Committee of Tort Claimants

/s/ Kenneth Enos
Counsel to the Future
Claimants' Representative