

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

<p>In re:</p> <p>BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC,<sup>1</sup></p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 20-10343 (LSS)</p> <p>(Jointly Administered)</p>
<p>PONIL RANCH, L.P.,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>BOY SCOUTS OF AMERICA,</p> <p style="text-align: center;">Defendant.</p>	<p>Adv. Pro. No. 21-51185 (LSS)</p>

**CERTIFICATION OF COUNSEL REGARDING ORDER FURTHER EXTENDING  
THE TIME TO ANSWER, MOVE OR OTHERWISE RESPOND TO THE COMPLAINT**

The undersigned counsel to Boy Scouts of America (“Defendant”) hereby certifies as follows:

1. On October 19, 2021, Ponil Ranch, L.P. filed the *Complaint* (A.D.I. 1) (the “Complaint”) against Defendant, initiating the above-captioned adversary proceeding (the “Adversary Proceeding”).

2. On November 8, 2021, the Court entered the *Order Approving Stipulation Extending the Time to Answer, Move or Otherwise Response to the Complaint* (A.D.I. 11), which extended the deadline for Defendant to answer, move or otherwise respond to the Complaint in the Adversary Proceeding through and including December 20, 2021.

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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.

3. At the hearing on December 14, 2021 (the “Hearing”), the Court approved a further extension of Defendant’s time to answer, move or otherwise respond to the Complaint through and including January 14, 2022.

4. Attached hereto as **Exhibit A** is a proposed order (the “Proposed Order”) reflecting the comments made at the Hearing. Counsel for Ponil Ranch, L.P. has reviewed the Proposed Order and does not object to its entry.

*[Remainder of this page intentionally left blank]*

WHEREFORE, it is hereby respectfully requested that the Court enter the Proposed Order attached hereto as **Exhibit A** at its earliest convenience.

Dated: December 20, 2021

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

/s/ Paige N. Topper

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ATTORNEYS FOR THE DEBTORS AND  
DEBTORS IN POSSESSION

**Exhibit A**

**Proposed Order**

**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)
PONIL RANCH, L.P.,  Plaintiff,  v.  BOY SCOUTS OF AMERICA,  Defendant.	Adv. Pro. No. 21-51185 (LSS)

**ORDER FURTHER EXTENDING THE TIME TO  
ANSWER, MOVE OR OTHERWISE RESPOND TO THE COMPLAINT**

Upon consideration of the *Certification of Counsel Regarding Order Further Extending the Time to Answer, Move or Otherwise Respond to the Complaint* (the "Certification")<sup>2</sup>; and the Court having determined that good and adequate cause exists; and the Court having determined that no further or other notice need be given, it is hereby ORDERED that:

1. Defendant shall have through and including January 14, 2022, to answer, move or otherwise respond to the Complaint.
2. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

<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.

<sup>2</sup> Capitalized terms not defined herein are defined in the Certification.