

**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)
OFFICIAL TORT CLAIMANTS' COMMITTEE OF BOY SCOUTS OF AMERICA and DELAWARE BSA, LLC, Plaintiffs, -against- BOY SCOUTS OF AMERICA and DELAWARE BSA, LLC, Defendants.	Adv. Pro. No. 21-50032 (LSS) Related Docket No.: 15

**CERTIFICATION OF COUNSEL REGARDING MOTION TO
INTERVENE OF JPMORGAN CHASE BANK, NATIONAL ASSOCIATION**

The undersigned counsel to JPMorgan Chase Bank, National Association (“JPM”) hereby certifies as follows:

1. On April 23, 2021, JPM filed its Motion to Intervene [Adv. Docket No. 15] (the “Motion”) in the above-captioned adversary proceeding. Pursuant to DEL. BANKR. L.R. 7007-1(a), objections or responses to the Motion were due on or before May 7, 2021.

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.

2. Prior to the response deadline, counsel to JPM received informal comments from counsel to plaintiff, the Official Tort Claimants' Committee of Boy Scouts of America and Delaware BSA, LLC ("Plaintiff"), with respect to the Motion.

3. In response to the informal comments from Plaintiff, JPM has prepared a revised proposed order granting the Motion, which is attached hereto as **Exhibit A** (the "Revised Proposed Order"). Attached hereto as **Exhibit B** is a redline reflecting the changes between the proposed order filed with the Motion and the Revised Proposed Order.

4. Except as set forth herein, the undersigned has received no answer, objection, or other response to the Motion. The Court's docket in these cases reflects that no answer, objection, or other response to the Motion has been filed.

WHEREFORE, the undersigned respectfully requests that the Revised Proposed Order attached hereto as **Exhibit A** be entered by the Court without further notice or hearing.

Dated: May 14, 2021
Wilmington, Delaware

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/s/ Morgan L. Patterson

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*Counsel to JPMorgan Chase Bank, National
Association*

EXHIBIT A

Revised Proposed Order

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**ORDER GRANTING MOTION TO INTERVENE
OF JPMORGAN CHASE BANK, NATIONAL ASSOCIATION**

Before the Court is the motion of JPMorgan Chase Bank, National Association (“JPM”) to intervene in the above-captioned adversary proceeding. After reviewing the motion and other submissions; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and the Court having found that venue of this proceeding is proper pursuant to 28 U.S.C. § 1408 and 1409; and proper and adequate notice has

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been given and no other or further notice is necessary; and after due deliberation thereon and for good cause having been shown,

**NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED
THAT:**

1. JPM is authorized to intervene in this adversary proceeding as a party plaintiff.
2. The Court retains jurisdiction over all matters arising from or related to the implementation or interpretation of this Order.

EXHIBIT B

Redline

**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)
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been given and no other or further notice is necessary; and after due deliberation thereon and for good cause having been shown,

**NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED
THAT:**

1. JPM is authorized to intervene in this adversary proceeding [as a party plaintiff](#).
2. The Court retains jurisdiction over all matters arising from or related to the implementation or interpretation of this Order.