

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

In re:)	Chapter 11
)	
BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC,)	Case No. 20-10343 (LSS)
)	
Debtors. ¹)	Jointly Administered
)	
)	Re: Docket Nos. 7480, 7532, 7533
)	
)	
)	
)	

**JOINDER OF TIMOTHY D. KOSNOFF, ESQUIRE AND KOSNOFF LAW, PLLC
TO THE LAW FIRMS’ OPPOSITION TO EISENBERG ROTHWEILER’S
MOTION FOR PROTECTIVE ORDER**

Timothy D. Kosnoff, Esquire, and Kosnoff Law, PLLC, by their undersigned counsel, hereby join (the “Joinder”) in the *Opposition to Motion for Protective Order* filed by Zalkin Law Firm, P.C. and Pfau Cochran Vertetis Amala PLLC [D.I. 7532 and 7533] (the “Opposition”).

Mr. Kosnoff and Kosnoff Law adopt and incorporate by reference all arguments set forth in the Opposition together with those arguments to be presented at any hearing on the Motion for Protective Order [D.I. 7480]. To the extent that any privilege or other protection against disclosure applies to any of the exhibits to or testimony contained in Mr. Kosnoff’s deposition of November 22, 2021, such privilege or protection was waived. Accordingly, Mr. Kosnoff and Kosnoff Law respectfully request that the Court deny the Motion for Protective Order and grant the relief requested in the Opposition.

¹The 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.

Respectfully submitted,

Date: December 2, 2021

WILKS LAW, LLC

/s/ David E. Wilks

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