

**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

**Ref. Docket No. 243, 553, 604, 820 &  
3147**

**FOURTH SUPPLEMENTAL DECLARATION OF EDWIN J. HARRON  
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2014(a)**

I, Edwin J. Harron, hereby state as follows:

1. I am a partner in the firm of Young Conaway Stargatt & Taylor, LLP (“Young Conaway”), Rodney Square, 1000 North King Street, Wilmington, Delaware 19801.

2. On March 20, 2020, Young Conaway filed the *Declaration of Edwin J. Harron in Support of the Application for Entry of an Order Authorizing the Proposed Future Claimants’ Representative to Retain and Employ Young Conaway Stargatt & Taylor, LLP as His Attorneys, Effective as of the Petition Date* [Docket No. 243] (the “Initial Declaration”).

3. On May 4, 2020, Young Conaway filed the *First Supplemental Declaration of Edwin J. Harron Pursuant to Federal Rule of Bankruptcy Procedure 2014(a)* [Docket No. 553].

4. Young Conaway’s employment was effective as of February 18, 2020 pursuant to order entered by this Court on May 11, 2020 [Docket No. 604].

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<sup>1</sup> 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.

5. On June 10, 2020, Young Conaway filed the *Second Supplemental Declaration of Edwin J. Harron Pursuant to Federal Rule of Bankruptcy Procedure 2014(a)* [Docket No. 820].

6. On May 5, 2021, Young Conaway filed the *Third Supplemental Declaration of Edwin J. Harron Pursuant to Federal Rule of Bankruptcy Procedure 2014(a)* [Docket No. 3147].

7. Young Conaway has continued to monitor any potential conflicts or connections that may arise with respect to its representation of James L. Patton, Jr., the legal representative for future claimants (the “Future Claimants’ Representative”), since the filing of the Initial Declaration and all subsequent supplemental declarations and submits the following additional disclosure.

8. This fourth supplemental declaration discloses Young Conaway’s representation of PNC Bank in litigation unrelated to abuse claims or the Debtors.

9. Based on the disclosures in the Initial Declaration and all subsequent supplemental declarations, Young Conaway continues to believe that (a) it is independent of the Debtors and the Interested Parties; (b) none of the matters disclosed in this declaration has had or will have an adverse effect on the firm’s ability to carry out its duties to the Future Claimants’ Representative to loyally and effectively represent the Future Claimants; and (c) pursuant to section 101(14), Young Conaway is a “disinterested person” and does not have any interest that is materially adverse to the Future Claimants.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 2<sup>nd</sup> day of December, 2021.

/s/ Edwin J. Harron  
Edwin J. Harron (No. 3396)  
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