

**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 Nos. 2719 and 3781**

**JOINDER OF THE FUTURE CLAIMANTS' REPRESENTATIVE TO THE  
OBJECTION OF THE TORT CLAIMANTS' COMMITTEE TO DEBTORS' MOTION  
FOR ENTRY OF AN ORDER (I) APPROVING LEHR SETTLEMENT AGREEMENT  
AND (II) MODIFYING THE AUTOMATIC STAY, TO THE EXTENT NECESSARY, TO  
PERMIT PAYMENT OF SETTLEMENT AMOUNT BY APPLICABLE INSURANCE**

James L. Patton, Jr., the duly-appointed legal representative for future claimants in the above-captioned matter (the "Future Claimants' Representative"), submits this joinder to the *Objection of the Tort Claimants' Committee to Debtors' Motion for Entry of an Order (I) Approving Lehr Settlement Agreement and (II) Modifying the Automatic Stay, to the Extent Necessary, to Permit Payment of Settlement Amount by Applicable Insurance* (the "TCC's Objection")<sup>2</sup> and respectfully states as follows:

**JOINDER**

The Future Claimants' Representative joins in the TCC's position as set forth in the TCC's Objection and agrees that the proposed Lehr settlement should not be approved at this time because it represents favorable treatment of non-abuse claimants over abuse survivor claimants.

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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.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the TCC's Objection.

**CONCLUSION**

WHEREFORE, the Future Claimants' Representative respectfully requests that the Court sustain the TCC's Objection consistent with the foregoing.

Dated: May 12, 2021

YOUNG CONAWAY STARGATT & TAYLOR, LLP

*/s/ Edwin J. Harron*

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

In re:

BOY SCOUTS OF AMERICA AND  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 12, 2021, the *Joinder of the Future Claimants' Representative to the Objection of the Tort Claimants' Committee to Debtors' Motion for Entry of an Order (I) Approving Lehr Settlement Agreement and (II) Modifying the Automatic Stay, to the Extent Necessary, to Permit Payment of Settlement Amount by Applicable Insurance* was caused to be served as indicated upon the parties identified on the attached service list.

Dated: May 12, 2021

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