

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

In re:

Boy Scouts of America and Delaware BSA,  
LLC,

Debtors.

Case No. 20-10343 (LSS)

Chapter 11

Jointly Administered

**JOINDER OF ARCHBISHOP OF AGAÑA, A CORPORATION SOLE TO THE ROMAN CATHOLIC AD HOC COMMITTEE'S OBJECTION TO THE DEBTORS' MOTION FOR AUTHORIZATION TO ENTER INTO AND PERFORM UNDER RESTRUCTURING SUPPORT AGREEMENT AND FOR RELATED RELIEF**

Archbishop of Agaña, a Corporation Sole, Chapter 11 Debtor-in-Possession, District Court of Guam, Territory of Guam, Bankruptcy Division, Case 19-00010 ("Archbishop of Agaña") by and through the undersigned counsel, hereby joins *Joint Objection of the Roman Catholic Ad Hoc Committee and the United Methodist Ad Hoc Committee to the Debtor's Motion for Authorization to Enter into and Perform Under Restructuring Support Agreement and for Related Relief and Joinder in Limited Objection and Reservation of Rights of the Church of Jesus Christ of Latter-Day Saints* [Docket No. 5676] (the "Catholic Committee Objection"). In support thereof, Archbishop of Agaña respectfully states as follows:

**JOINDER**

1. Archbishop of Agaña and/or certain parishes within the geographic footprint of Archbishop of Agaña have been involved in supporting and facilitating the scouting programs of the Boy Scouts of America and Delaware BSA, LLC (collectively, the "Debtors").

2. Archbishop of Agaña respectfully joins the arguments raised in the Catholic Committee Objection and adopts and incorporates such arguments as if more fully set forth herein.

3. Archbishop of Agaña respectfully requests that this Court deny the relief sought by the Debtors through the *Debtors' Motion For Entry of an Order, Pursuant to Sections 363(b) and*

*105(a) of the Bankruptcy Code, (I) Authorizing the Debtors to Enter Into and Perform Under the Restructuring Support Agreement, and (II) Granting Related Relief* [Docket No. 5466] (the “RSA Motion”) for the reasons set forth in the Catholic Committee Objection and incorporated herein by reference.

4. Archbishop of Agaña respectfully reserves the right to raise and present additional authorities, arguments, evidence, and objections in connection with the matters addressed in the foregoing pleadings or that may arise during the hearing. In the event that the Catholic Committee Objection is withdrawn or otherwise resolved, Archbishop of Agaña further reserves the right to present argument on the RSA Motion at the hearing.

Dated: July 22, 2021

GELLERT SCALI BUSENKELL & BROWN LLC

/s/ Charles J. Brown, III

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*Counsel for Archbishop of Agaña, a  
Corporation Sole*

**CERTIFICATE OF SERVICE**

I, Charles J. Brown, III, Esquire, certify that on July 22, 2021, I caused a true and correct copy of *Joinder of Archbishop of Agaña, a Corporation Sole to the Roman Catholic Ad Hoc Committee's Objection to the Debtors' Motion for Authorization to Enter Into and Perform Under the Restructuring Support Agreement and for Related Relief* to be electronically filed and served via CM/ECF to all parties requesting electronic service in this case and upon the parties listed below via electronic mail:

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/s/ Charles J. Brown, III  
Charles J. Brown, III (DE 3368)

Dated: July 22, 2021