

**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)

**Hearing Date:** TBD

**Objection Deadline:**  
April 19, 2022 at 4:00 p.m. (ET)

**EIGHTH INTERIM FEE APPLICATION REQUEST OF KCIC, LLC  
AS INSURANCE AND VALUATION CONSULTANT FOR THE DEBTORS  
AND DEBTORS IN POSSESSION, FOR ALLOWANCE OF COMPENSATION  
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM  
NOVEMBER 1, 2021 TO AND INCLUDING JANUARY 31, 2022**

Name of Applicant:	<u>KCIC, LLC</u>
Authorized to Provide Professional Services to:	<u>Debtors and Debtors in Possession</u>
Date of Retention:	<u>February 18, 2020</u>
Period for Which Compensation and Reimbursement Are Requested:	<u>November 1, 2021 – January 31, 2022</u>
Amount of Compensation Requested:	<u>\$899,684.00 (80% = \$719,747.20)</u>
Amount of Expense Reimbursement Requested:	<u>\$1,249.42</u>

This is a(n): monthly \_\_\_\_ interim x final application \_\_\_\_

---

<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.

**PRIOR MONTHLY APPLICATIONS FILED**

		Requested		Approved		Outstanding	
Date Filed; D.I.	Period Covered	Fees	Expenses	Fees	Expenses	Fees	Expenses
5/28/20; D.I. 716	2/18/20 – 4/30/20	\$11,116.00	\$0.00	\$11,116.00	\$0.00	\$0.00	\$0.00
8/6/20; D.I. 1079	5/1/20 – 6/30/20	\$2,135.50	\$0.00	\$2,135.50	\$0.00	\$0.00	\$0.00
8/21/20; D.I. 1138	7/1/20 – 7/31/20	\$7,629.00	\$0.00	\$7,629.00	\$0.00	\$0.00	\$0.00
11/18/20; D.I. 1696	8/1/20 – 8/31/20	\$15,916.00	\$0.00	\$12,732.80	\$0.00	\$3,183.20	\$0.00
11/30/20; D.I. 1759	9/1/20 – 9/30/20	\$93,765.50	\$0.00	\$75,012.40	\$0.00	\$18,753.10	\$0.00
11/30/20; D.I. 1760	10/1/20 – 10/31/20	\$293,090.50	\$0.00	\$234,472.40	\$1,386.39	\$58,618.10	\$0.00
2/16/21; D.I. 2219	11/1/20 – 11/30/20	\$297,683.50	\$0.00	\$238,146.40	\$0.00	\$59,537.00	\$0.00
2/16/21; D.I. 2229	12/1/20 – 12/31/20	\$209,046.50	\$0.00	\$167,237.20	\$0.00	\$41,809.30	\$0.00
3/10/21; D.I. 2351	1/1/21 – 1/31/21	\$272,927.00	\$261.95	\$218,341.60	\$261.95	\$54,585.40	\$0.00
5/20/21; D.I. 4706	2/1/21 – 2/28/21	\$187,683.00	\$0.00	\$150,146.40	\$0.00	\$37,536.60	\$0.00
5/24/21; D.I. 4923	3/1/21 – 3/31/21	\$177,049.50	\$0.00	\$141,639.60	\$0.00	\$35,409.90	\$0.00
6/4/21; D.I. 5227	4/1/21 – 4/30/21	\$118,248.00	\$13.00	\$94,598.40	\$13.00	\$23,649.60	\$0.00
8/31/21; D.I. 6144	5/1/21 – 5/31/21	\$70,811.00	\$0.00	\$56,648.80	\$0.00	\$14,162.20	\$0.00
9/2/21; D.I. 6156	6/1/21 – 6/30/21	\$35,149.00	\$0.00	\$28,119.20	\$0.00	\$7,029.80	\$0.00
10/1/21; D.I. 6466	7/1/21 – 7/31/21	\$23,574.50	\$0.00	\$18,859.60	\$0.00	\$4,714.90	\$0.00
10/28/21 D.I. 8031	8/1/21 – 8/31/21	\$15,803.00	\$0.00	\$12,642.40	\$0.00	\$3,160.60	\$0.00
10/28/21 D.I. 8032	9/1/21 – 9/30/21	\$52,089.00	\$0.00	\$41,671.20	\$0.00	\$10,417.80	\$0.00

01/11/22 D.I 8232	10/1/21 – 10/31/21	\$71,847.00	\$13.59	\$57,477.60	\$13.59	\$14,369.40	\$0.00
02/18/22 D.I 8911	11/1/21 – 11/30/21	\$354,215.00	\$0.00	\$283,372.00	\$0.00	\$70,843.00	\$0.00
02/18/22 D.I 8926	12/1/21 – 12/31/21	\$258,745.00	\$0.00	\$206,996.00	\$0.00	\$51,749.00	\$0.00
04/05/22 D.I. 9579	1/1/22 – 1/31/22	\$286,724.00	\$0.00	\$229,379.20	\$1,249.42	\$57,344.80	\$0.00

### **COMPENSATION AND HOURS BY PROFESSIONAL**

<b>Name</b>	<b>Position Area of Expertise</b>	<b>Year of Admission / Years of Experience</b>	<b>Hourly Rate<sup>2</sup></b>	<b>Total Hours<sup>3</sup></b>	<b>Total Compensation</b>
Chloe McKinney	Consultant	0.5 years	\$150.00	18.9	\$2,835.00
Mark Boyle	Consultant	0.5 years	\$150.00	5.8	\$870.00
Clayton Austin	Consultant	1 year	\$200.00	9.9	\$1,980.00
Jack Boo	Consultant	1 year	\$200.00	27.3	\$5,460.00
Matthew Minter	Consultant	1.5 years	\$250.00	8.5	\$2,125.00
Kelly Monroe	Consultant	1.5 years	\$250.00	32.3	\$8,075.00
Scott Dettloff	Consultant	1.5 years	\$250.00	4.1	\$1,025.00
Luke Butterworth	Senior Consultant	2.5 years	\$300.00	65.1	\$19,530.00
Julia Grehan	Senior Consultant	2.5 years	\$307.41	17	\$5,226.00
Sheila Klauck	Manager	7 years	\$423.45	324.1	\$137,239.00
Victor Taylor	Manager	6 years	\$442.90	387.1	\$171,448.00
Megan Shockley	Managing Director	15 years	\$538.11	24.3	\$13,076.00
Nicholas Sochurek	Managing Director	17 years	\$583.04	164.2	\$95,735.00
Elizabeth Hanke	Vice President	20+ years	\$600.00	253.5	\$152,100.00
Jonathan Terrell	President	25+ years	\$700.00	26.4	\$18,480.00
Nancy Gutzler	Vice President	20+ years	\$800.00	330.6	\$264,480.00
<b>Total</b>				<b>1,699.1</b>	<b>\$899,684.00</b>

<sup>2</sup> As of January 1, 2022, KCIC implemented adjustments to hourly rates for some of its employees. Such adjustments are reflected in the figures in this column.

<sup>3</sup> KCIC, LLC charged the Debtors for 50% of non-working travel time in compliance with Local Rule 2016–2(d)(viii). Such reductions are reflected in the figures in this column.

**COMPENSATION AND EXPENSES BY PROJECT CATEGORY**

<b>Task Description</b>	<b>Total Hours</b>	<b>Total Compensation</b>
Allocations	21.4	\$9,882.00
Coverage Analysis	58.5	\$29,752.00
Exhaustion Analysis	2.1	\$1,260.00
Expert Retention	1,565.3	\$839,915.00
Fee Applications	13.9	\$4,320.00
LC Notice	24.6	\$9,045.00
Local Council	13.3	\$5,510.00
<b>TOTAL:</b>	<b>1,699.1</b>	<b>\$899,684.00</b>

**EXPENSES BY CATEGORY**

<b>Category</b>	<b>Amount</b>
Meal Expense	\$37.58
Lodging/Travel Accommodation	1,211.84
<b>TOTAL:</b>	<b>\$1,249.42</b>

Annexed hereto are the following schedules for compensation and reimbursement of expenses sought by KCIC, LLC for the period from November 1, 2021 to and including January 31, 2022:

Exhibit A Summary of Time Detail by Task  
Exhibit B Summary of Time Detail by Professional  
Exhibit C Summary of Expense Detail by Category

**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)

**Hearing Date:** TBD

**Objection Deadline:**  
April 19, 2022 at 4:00 p.m. (ET)

**EIGHTH INTERIM FEE APPLICATION REQUEST OF KCIC, LLC  
AS INSURANCE AND VALUATION CONSULTANT FOR THE DEBTORS  
AND DEBTORS IN POSSESSION, FOR ALLOWANCE OF COMPENSATION  
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM  
NOVEMBER 1, 2021 TO AND INCLUDING JANUARY 31, 2022**

KCIC, LLC (“KCIC”), insurance and valuation consultant for the Boy Scouts of America and Delaware BSA, LLC, the non-profit corporations that are debtors and debtors in possession (together, the “Debtors”) in the above-captioned chapter 11 cases, hereby submits this eighth interim application (this “Application”) for entry of an order, pursuant to section 331 of chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), granting interim compensation and reimbursement of expenses for the period from November 1, 2021 to and including January 31, 2022. In support of this Application, KCIC respectfully represents as follows:

**JURISDICTION AND VENUE**

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334 and the *Amended Standing Order of*

---

<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.

*Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory and other bases for the relief requested herein are sections 330 and 331 of the Bankruptcy Code, rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the *Order (I) Approving Procedures for (A) Interim Compensation and Reimbursement of Expenses of Retained Professionals and (B) Expense Reimbursement for Official Committee Members and (II) Granting Related Relief* [Docket No. 341], as amended by the *Order Amending the Order Approving Procedures for (A) Interim Compensation and Reimbursement of Expenses of Retained Professionals and (B) Expense Reimbursement for Official Committee Members and (II) Granting Related Relief* [Docket No. 5899] (the “Amended Interim Compensation Order”).

### **BACKGROUND**

3. On February 18, 2020 (the “Petition Date”), each of the Debtors filed a voluntary petition with the Court for relief under chapter 11 of the Bankruptcy Code. The Debtors continue to operate and maintain their non-profit organization and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On February 19, 2020, the Court entered an order [Docket No. 61] authorizing the joint administration and procedural consolidation of the chapter 11 cases pursuant to Bankruptcy Rule 1015(b).

4. The Debtors retained KCIC as their Insurance and Valuation Consultant, *nunc pro tunc* to the Petition Date, pursuant to the *Order Authorizing the Retention and Employment of KCIC, LLC as Insurance and Valuation Consultant for the Debtors and Debtors in Possession*,

Nunc Pro Tunc *to the Petition Date* [Docket No. 340] (the “Retention Order”). The Retention Order authorizes the Debtors to compensate and reimburse KCIC in accordance with the terms and conditions set forth in the Debtors’ application to retain KCIC, subject to KCIC’s application to the Court.

5. KCIC has rendered services on behalf of the debtors for the period from November 1, 2021 through January 31, 2022 (the “Compensation Period”), totaling 1,699.1 hours of professional time.

6. Attached hereto as Exhibits A–C is a summary of professional services rendered and expenses incurred by each KCIC professional and by category during the Compensation Period.

7. The total sum due to KCIC for professional services rendered on behalf of the Debtors for the Compensation Period is \$899,684.00. KCIC submits that the professional services it rendered on behalf of the debtors during this time were reasonable and necessary.

8. KCIC also expended costs on behalf of the Debtors in the sum of \$1,249.42 during the Compensation period. Attached hereto as Exhibit C is a summary by category of expenses incurred during the compensation period.

9. KCIC accordingly seeks allowance of the sum of \$899,684.00 in fees and \$1,249.42 in expenses, for a total of \$900,933.42, to be paid pursuant to the Amended Interim Compensation Order.

10. The undersigned hereby attests that she has reviewed the requirements of Local Rule 2016-2 and this Application conforms to such requirements.

**CERTIFICATION OF COMPLIANCE**

11. The undersigned has reviewed the requirements of Local Rule 2016-2 and certifies that, to the best of her knowledge, information and belief, this Application complies with that rule.

WHEREFORE, KCIC requests (i) allowance on an interim basis of compensation for necessary and valuable professional services rendered to the Debtors in the sum of \$899,684.00 and reimbursement of actual and necessary expenses incurred in the sum of \$1,249.42 for the period from November 1, 2021, to and including January 31, 2022, and (ii) such other relief as this Court deems just and proper.

Dated: April 5, 2022  
Wilmington, Delaware

**KCIC, LLC**

/s/ Elizabeth Hanke  
Elizabeth Hanke  
1401 I Street, NW, Suite 1200  
Washington, DC 20005  
Telephone: (202) 650-0503  
Facsimile: (202) 650-0651  
E-mail: hanke@kcic.com

INSURANCE AND VALUATION  
CONSULTANT TO THE DEBTORS AND  
DEBTORS IN POSSESSION



**Exhibit A****Summary of Time Detail by Task**

<b>Task Description</b>	<b>Total Hours</b>	<b>Total Compensation</b>
Allocations	21.4	\$9,882.00
Coverage Analysis	58.5	\$29,752.00
Exhaustion Analysis	2.1	\$1,260.00
Expert Retention	1,565.3	\$839,915.00
Fee Applications	13.9	\$4,320.00
LC Notice	24.6	\$9,045.00
Local Council	13.3	\$5,510.00
<b>TOTAL:</b>	<b>1,699.1</b>	<b>\$899,684.00</b>

**Exhibit B****Summary of Time Detail by Professional**

<b>Name</b>	<b>Position Area of Expertise</b>	<b>Year of Admission / Years of Experience</b>	<b>Hourly Rate<sup>1</sup></b>	<b>Total Hours<sup>2</sup></b>	<b>Total Compensation</b>
Chloe McKinney	Consultant	0.5 years	\$150.00	18.9	\$2,835.00
Mark Boyle	Consultant	0.5 years	\$150.00	5.8	\$870.00
Clayton Austin	Consultant	1 year	\$200.00	9.9	\$1,980.00
Jack Boo	Consultant	1 year	\$200.00	27.3	\$5,460.00
Matthew Minter	Consultant	1.5 years	\$250.00	8.5	\$2,125.00
Kelly Monroe	Consultant	1.5 years	\$250.00	32.3	\$8,075.00
Scott Dettloff	Consultant	1.5 years	\$250.00	4.1	\$1,025.00
Luke Butterworth	Senior Consultant	2.5 years	\$300.00	65.1	\$19,530.00
Julia Grehan	Senior Consultant	2.5 years	\$307.41	17	\$5,226.00
Sheila Klauck	Manager	7 years	\$423.45	324.1	\$137,239.00
Victor Taylor	Manager	6 years	\$442.90	387.1	\$171,448.00
Megan Shockley	Managing Director	15 years	\$538.11	24.3	\$13,076.00
Nicholas Sochurek	Managing Director	17 years	\$583.04	164.2	\$95,735.00
Elizabeth Hanke	Vice President	20+ years	\$600.00	253.5	\$152,100.00
Jonathan Terrell	President	25+ years	\$700.00	26.4	\$18,480.00
Nancy Gutzler	Vice President	20+ years	\$800.00	330.6	\$264,480.00
<b>Total</b>				<b>1,699.1</b>	<b>\$899,684.00</b>

<sup>1</sup> As of January 1, 2022, KCIC implemented adjustments to hourly rates for some of its employees. Such adjustments are reflected in the figures in this column.

<sup>2</sup> KCIC, LLC charged the Debtors for 50% of non-working travel time in compliance with Local Rule 2016-2(d)(viii). Such reductions are reflected in the figures in this column.

**Exhibit C**

**Summary of Expense Detail by Category**

Category	Amount
Meal Expense	\$37.58
Lodging/Travel Accommodation	1,211.84
<b>TOTAL:</b>	<b>\$1,249.42</b>