

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

<p>In re:</p> <p>BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC,¹</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 20-10343 (LSS)</p> <p>(Jointly Administered)</p>
<p>PONIL RANCH, L.P.,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>BOY SCOUTS OF AMERICA,</p> <p style="text-align: center;">Defendant.</p>	<p>Adv. Pro. No. 21-51185 (LSS)</p>

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING STIPULATION
EXTENDING THE TIME TO ANSWER, MOVE OR OTHERWISE RESPOND TO THE
COMPLAINT**

Ponil Ranch, L.P. (“Plaintiff”), and Boy Scouts of America (“Defendant,” and together with Plaintiff, the “Parties”), by and through their undersigned counsel, hereby certify that:

1. On October 19, 2021, Plaintiff filed the *Complaint* (A.D.I. 1) (the “Complaint”) against Defendant, initiating the above-captioned adversary proceeding (the “Adversary Proceeding”).

2. The current deadline for Defendant to answer, move or otherwise respond to the Complaint in the Adversary Proceeding is November 18, 2021.

¹ The Debtors in the 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.

3. Pursuant to Local Rule 7012-2, counsel for the Parties have agreed and entered into a stipulation (the “Stipulation”), attached as **Exhibit 1** to the proposed form of order, extending Defendant’s time to answer, move or otherwise respond to the Complaint, through and including December 20, 2021.

4. Except as specifically set forth herein, all rights, claims and defenses of the Parties shall be fully preserved.

[Remainder of this page intentionally left blank]

WHEREFORE, it is hereby respectfully requested that the Court enter the proposed form of order approving the Stipulation attached hereto as **Exhibit A** at its earliest convenience.

Dated: November 3, 2021

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Paige N. Topper

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ATTORNEYS FOR THE DEBTORS AND
DEBTORS IN POSSESSION

Exhibit A

Proposed Order

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

In re: BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC, ¹ Debtors.	Chapter 11 Case No. 20-10343 (LSS) (Jointly Administered)
PONIL RANCH, L.P., Plaintiff, v. BOY SCOUTS OF AMERICA, Defendant.	Adv. Pro. No. 21-51185 (LSS)

**ORDER APPROVING STIPULATION EXTENDING THE TIME TO
ANSWER, MOVE OR OTHERWISE RESPOND TO THE COMPLAINT**

Upon consideration of the *Certification of Counsel Regarding Order Approving Stipulation Extending the Time to Answer, Move or Otherwise Respond to the Complaint* (the "Certification")² and the Stipulation; and the Court having determined that good and adequate cause exists for approval of the Stipulation; and the Court having determined that no further or other notice of the Stipulation need be given, except as provided for herein, it is hereby ORDERED that:

1. The Stipulation attached hereto as **Exhibit 1** is approved.
2. Defendant shall have through and including December 20, 2021, to answer, move or otherwise respond to the Complaint.

¹ The Debtors in the 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.

² Capitalized terms not defined herein are defined in the Certification.

3. Except as specifically set forth herein, all rights, claims and defenses of the Parties shall be fully preserved.

4. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

EXHIBIT 1

Stipulation

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

<p>In re:</p> <p>BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC,¹</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 20-10343 (LSS)</p> <p>(Jointly Administered)</p>
<p>PONIL RANCH, L.P.,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>BOY SCOUTS OF AMERICA,</p> <p style="text-align: center;">Defendant.</p>	<p>Adv. Pro. No. 21-51185 (LSS)</p>

**STIPULATION EXTENDING THE TIME TO ANSWER, MOVE OR OTHERWISE
RESPOND TO THE COMPLAINT**

Ponil Ranch, L.P. (“Plaintiff”), and Boy Scouts of America (“Defendant,” and together with Plaintiff, the “Parties”), hereby agree and stipulate to the following:

WHEREAS, on October 19, 2021, Plaintiff filed the *Complaint* (A.D.I. 1) (the “Complaint”) against Defendant, initiating the above-captioned adversary proceeding;

WHEREAS, Defendant’s deadline to answer, move or otherwise respond to the Complaint is November 18, 2021;

WHEREAS, pursuant to Local Rule 7012-2, counsel to the Parties agree to extend the time for Defendant to answer, move or otherwise respond to the Complaint through and including December 20, 2021;

¹ The Debtors in the 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.

NOW THEREFORE, in consideration of the premises and mutual covenants contained herein and other valuable consideration, the receipt of which is hereby acknowledged, it is stipulated and agreed by and between the Parties, as follows:

1. Defendant's time to answer, move or otherwise respond to the Complaint is extended through and including December 20, 2021.

2. This extension is without prejudice to the rights of any party, including the right to agree to further extensions of time for the filing of the answer or other response, or the right of Defendant to seek further extensions of time from the Court to answer, move or otherwise respond to the Complaint, and Plaintiff's rights to oppose any such requests by Defendant.

[Remainder of this page intentionally left blank]

Dated: November 3, 2021

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