

**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)

Re: **D.I. 5348**

**DEBTORS' RESPONSE TO THIRD-PARTY MOTION FOR
CORRECTION AND RESPONSE**

Boy Scouts of America and Delaware BSA, LLC, the non-profit corporations that are debtors and debtors in possession in the above-captioned chapter 11 cases (together, the “Debtors”), submit this response to the *Third-Party Motion for Correction and Response* [D.I. 5348] (the “Motion”) and respectfully state as follows:

1. On June 15, 2021, the clerk of the United States Bankruptcy Court for the District of Delaware docketed the Motion on behalf of the Movant.² As detailed in the Motion, the Movant has requested that his contact information be updated to reflect the correct address listed in the Motion and that he receive confirmation that this update has occurred.

2. Following receipt of the Motion, the Debtors directed their claims agent, Omni Agent Solutions (“Omni”), to update the claims register and any relevant service lists with respect

¹ 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.

² The Movant’s identity will remain confidential pursuant to the *Final Order (I) Authorizing the Debtors to File (A) a Consolidated List of Counsel Representing the Largest Numbers of Abuse Victims and (B) a Consolidated List of Other Unsecured Creditors of the Debtors, (II) Authorizing and Approving Special Noticing and Confidentiality Procedures, and (III) Granting Related Relief* [D.I. 274].

to the Movant's mailing address. On June 22, 2021, Omni sent a letter to the Movant at the updated mailing address, confirming that the Movant's address was updated. Attached hereto as **Exhibit A** is a copy of the letter with the Movant's name and address redacted (the "Letter"). As of the filing of this response, neither the Debtors nor Omni have received a reply to the Letter.

3. The Debtors will serve the Movant a copy of this response at the updated mailing address.

4. Based on the foregoing, the Debtors believe that the Motion is resolved and no further action from the Court is required.

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Dated: July 8, 2021
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Michelle M. Fu

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ATTORNEYS FOR THE DEBTORS AND
DEBTORS IN POSSESSION

Exhibit A

Letter

EXHIBIT A



June 22, 2021



We have received your letter and updated our database with your correct address information as provided. We are not attorneys so we cannot give any legal advice on your claim or the case. We do not send out updates to the case other than what the courts instruct us to disseminate. Below is a general update for you of the case.

The advisors for the debtors, the creditors' committee, and the TCC, among others, continue to negotiate the terms of the plan of reorganization, the current version of which you can review [Docket No. 5368]. This is the document that will outline the terms of a global settlement for abuse claimants, among other things. There is a hearing to consider approval of the disclosure statement (which you can review [Docket No. 5373]), which is the document that describes the terms of the plan in greater detail. The solicitation hearing is scheduled in late July 20,2021.

Once approved, copies of the disclosure statement, including the plan, will be sent to abuse claimants (or their lawyers, depending on the communication preference indicated on the proof of claim form) to vote on. This process is called solicitation. Once that is complete, the court will hold a hearing to determine whether to approve the plan (called confirmation).

At the same this time, and for many months after, abuse claims will be evaluated by various professionals, including the ones I mentioned above, and negotiations will be ongoing as to settlement amounts. I do not have any details, but I suspect this will take quite some time.

That is all we really know at-the-moment, but we are here for you if you want to talk or have questions, at (866) 907-2721.

Best Regards
Jd

John Doherty
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