

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

In re:

Boy Scouts of America and Delaware BSA,  
LLC,<sup>1</sup>

Debtors.

Case No. 20-10343 (LSS)

Chapter 11

Jointly Administered

**AMENDED VERIFIED STATEMENT OF THE ROMAN CATHOLIC AD HOC  
COMMITTEE PURSUANT TO BANKRUPTCY RULE 2019**

Pursuant to Fed. R. Bankr. P. 2019, the Roman Catholic Ad Hoc Committee (the “**Committee**”) submits this amended verified statement in connection with the above captioned chapter 11 cases (the “**Chapter 11 Cases**”).

1. On February 18, 2020 (the “**Petition Date**”), debtors Boy Scouts of America (“**BSA**”) and Delaware BSA, LLC (collectively, the “**Debtors**”) filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code.

2. In October 2020, The Catholic Mutual Relief Society of America (“**Catholic Mutual**”) retained Schiff Hardin LLP (“**Schiff Hardin**”) to represent its interests in these Chapter 11 Cases. In February 2021, Catholic Mutual also retained Potter Anderson & Corroon LLP (“**Potter Anderson**”) to serve as Delaware counsel in these Chapter 11 Cases. Catholic Mutual filed its appearance in the Chapter 11 Cases on February 25, 2021. Dkt. No. 2269.

3. Catholic Mutual is a non-profit corporation established in 1889 that operates as a self-protection fund of the Roman Catholic Church in the United States and Canada. In this role, Catholic Mutual issues certificates of coverage to members that provide them with coverage for certain property and casualty risks. Catholic Mutual counts 112 of the 195 United States Catholic

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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.

archdioceses and dioceses among its members. Those Catholic archdioceses and dioceses in turn have parishes, schools and other catholic organizations within their geographical boundaries that are Chartered Organizations<sup>2</sup> that sponsor scouting activities and that participate in coverage against abuse claims under certificates issued by Catholic Mutual.

4. In June 2021, representatives of Catholic Mutual and certain of its member dioceses and archdioceses formed the Committee to protect and advance their common interests in the Chapter 11 Cases. The Committee has retained Schiff Hardin and Potter Anderson to represent it in these Chapter 11 Cases.<sup>3</sup> The Committee is continuing its outreach and expects to add as members other Catholic dioceses and archdioceses that are not members of Catholic Mutual. However, Catholic Mutual's members and the members of the Committee are representative of the United States Catholic dioceses and archdioceses and the Catholic Chartered Organizations within them.

5. Each of the Catholic dioceses and archdioceses and their respective Chartered Organizations represented by a member of the Committee is a party in interest and holds a Claim against BSA arising from BSA's obligation to indemnify and hold Chartered Organizations harmless for any injuries or damages arising out of official scouting activities or arising out of BSA membership standards, including, but not limited to, Abuse Claims that now or in the future may be asserted against such entities by scouts or other persons. Each of these Catholic entities also is a party in interest and holds a Claim against BSA arising out of BSA's obligation to provide Chartered Organizations primary general liability insurance to cover Chartered Organizations and

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<sup>2</sup> Capitalized terms not defined herein have the meanings stated in the Debtors' Third Amended Chapter 11 Plan of Reorganization. Dkt. No. 5368.

<sup>3</sup> The Committee has also consented to Schiff Hardin's and Potter Anderson's concurrent representation of Catholic Mutual in these Chapter 11 Cases.

related entities with respect to Claims arising out of official scouting activities, including, but not limited to, insurance coverage for Abuse Claims that now or in the future may be asserted against such entities by scouts or other persons. Finally, each of these Catholic entities have valuable property rights as additional insureds entitled to defense and indemnity obligations under BSA Insurance Policies and Local Council Insurance Policies that will be affected by the Plan and other proceedings in these chapter 11 Cases. As of the date of this filing, the date, number, and amount of each Claim held by these Catholic entities is unknown.

6. Catholic Mutual is a party in interest and has a Claim against BSA to the extent BSA fails to honor its obligations to indemnify and provide primary liability coverage for Abuse Claims that now or in the future may be asserted against Catholic Mutual's members, including Catholic entities represented by members of the Committee, as discussed above, and to the extent those members seek coverage under the certificates issued to them by Catholic Mutual. As of the date of this filing, the date, number, and amount of Catholic Mutual's Claim is unknown.

7. The Committee filed its initial Verified Statement Pursuant to Bankruptcy Rule 2019 on June 25, 2021 when the Committee consisted of 7 members, listed on the schedule attached as Exhibit A to that initial Verified Statement. Dkt. No. 5421.

8. The Committee has since grown by 2 additional members, representatives of the Archdiocese of New York and the Archdiocese of Chicago, necessitating this Amended Verified Statement in accordance with the requirements of Fed. R. Bankr. P. 2019.

9. The nine current members of the Committee, as well as their addresses and the entity affiliated with each member, are listed on the schedule attached as **Exhibit A** hereto.

10. As of the date of this disclosure, the members of the Committee do not hold or represent any other economic interest in relation to the Debtors other than as stated above.

11. Other than as disclosed herein, the Committee does not represent or purport to represent any other entities with respect to these Chapter 11 Cases.

12. The undersigned reserves the right to further amend or supplement this Verified Statement in accordance with the requirements of Fed. R. Bankr. P. 2019 with any additional information that may become available, including any further additions to the Committee's membership.

13. Pursuant 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that the foregoing is true and correct to the best of his knowledge, information, and belief.

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Dated: July 29, 2021  
Wilmington, Delaware

Respectfully submitted,

**POTTER ANDERSON & CORROON LLP**

/s/ Jeremy W. Ryan

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- and -

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*Counsel to the Roman Catholic Ad Hoc  
Committee*

**EXHIBIT A**

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<b>Committee Member</b>	<b>Address</b>	<b>Affiliation</b>
Rodney W. Oligmueller	10843 Old Mill Rd Omaha, NE 68154-2600	Catholic Mutual Relief Society of America
Royce Ranninger	1821 Jackson Street Souix City, IA 51105	Roman Catholic Diocese of Souix City
Brian Schroeder	16555 Weber Road Crest Hill, IL 60403	Roman Catholic Diocese of Joliet
James J. Stolze	2222 N. 111 <sup>th</sup> Street Omaha, NE 68164	Roman Catholic Diocese of Omaha
Andrew D. Brannon	55 W. Sanborn St. Winona, MN 55987	Roman Catholic Diocese of Winona-Rochester
Deacon Eric Simontis	P.O. Box 29260 Washington, D.C. 20017-0260	Roman Catholic Archdiocese of Washington, D.C.
David Spotanski	2401 Lake Park Drive. S.E. Smyrna, GA 30080	Roman Catholic Archdiocese of Atlanta
Frank Napolitano	1011 First Ave., New York, NY 10022	Roman Catholic Archdiocese of New York
James C. Geoly	835 N. Rush St., Chicago, IL 60611	Roman Catholic Archdiocese of Chicago

**CERTIFICATE OF SERVICE**

I, Jeremy Ryan do hereby certify that on July 29, 2021, a copy of the foregoing **Amended Verified Statement of the Roman Catholic Ad Hoc Committee Pursuant to Bankruptcy Rule 2019** was served on the parties listed via email.

/s/ Jeremy Ryan  
Jeremy Ryan (No. 4057)



**SERVICE LIST**

<p><b><u>VIA EMAIL</u></b> Derek C. Abbott, Esq. Andrew R. Remming, Esq. Eric W. Moats, Esq. Paige N. Topper, Esq. <b>MORRIS, NICHOLS, ARSHT &amp; TUNNELL LLP</b> 1201 North Market Street, 16th Floor P.O. Box 1347 Wilmington, Delaware 19899-1347 Email: dabbott@morrisnichols.com aremming@morrisnichols.com emoats@morrisnichols.com ptopper@morrisnichols.com</p>	<p><b><u>VIA EMAIL</u></b> Jessica C. Lauria, Esq. <b>WHITE &amp; CASE LLP</b> 1221 Avenue of the Americas New York, New York 10020 Email: jessica.lauria@whitecase.com</p>
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