

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

In re:

BOY SCOUTS OF AMERICA AND
DELAWARE BSA, LLC,

Debtors.¹

Chapter 11

Case No. 20-10343 (LSS)
(Jointly Administered)

Related DI Nos: 13267, 13268

**STATUS REPORT OF THE HONORABLE BARBARA J. HOUSER (RET.), IN HER
CAPACITY AS TRUSTEE OF THE BSA SETTLEMENT TRUST, ON CLAIMANT
E.K.'S CLAIM [D.I. 13267/13268]**

The Honorable Barbara J. Houser (Ret.) (the “Trustee”), in her capacity as trustee of the BSA Settlement Trust (the “Trust”), hereby submits this Status Update on Claimant E.K. in response to the Claimant’s November 6, 2025 Letter [D.I. 13267/13268] (the “Letter”) filed on the docket.

STATUS UPDATE

I. E.K.’s Letter.

In his Letter, Claimant E.K. describes the Abuse he suffered in connection with Scouting and the effects the Abuse had on his life. *See* Letter at 1–3. E.K. then describes the steps he has taken in connection with the Trust’s Claims process to have his Claim evaluated. *Id.* at 3. Finally, he expresses concerns with his ability to gather certain proof related to his Claim due to the passing of his parents and neighbors (who had knowledge of his involvement with Scouting) as well as the fact that he did not keep any memorabilia from his time with Scouting because he did not want to be reminded of the Abuse he suffered. *Id.* at 3–6. E.K. raises questions concerning how BSA does

¹ The Reorganized Debtors in these Chapter 11 Cases, together with the last four digits of Debtor’s federal tax identification number, are as follows: Boy Scouts of America (6300) and Delaware BSA, LLC (4311). The Reorganized Debtors’ mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

not have records of every individual who was involved in Scouting and states that he has done everything he believes he could do to support his Claim based on the information and memories he has. *Id.* at 6, 9.

II. Status of E.K.’s Claim.

E.K. submitted a timely Proof of Claim in October 2020 and, subsequently, submitted a timely Claims Questionnaire on April 18, 2024. E.K. is represented by Slater Slater Schulman LLP (“Slater”).

E.K.’s Claim is currently at the Initial Review stage. The Trust has not issued any additional information requests based on its review of E.K.’s Claims Questionnaire.

As E.K. is represented by Slater, until recently his Claim was on hold due to irregularities the Trust identified in a population of Claims submitted by Slater. As noted in the *Notice of Issues with Trust Claims Submissions by Slater Slater Schulman LLP* [D.I. 13103] (the “Slater Notice”), in June 2024, the Trust advised Slater that it believed there were irregularities in some of Slater’s Claim submissions to the Trust and, as a result, paused the processing of all Matrix Claims submitted by Slater while an investigation of the irregularities was conducted. *See* Slater Notice at 1. Ultimately, the Trust confirmed, and Slater agreed, that there were procedural and factual problems in some of Slater’s Claim submissions to the Trust. *Id.*

As a result, the Trust and Slater hired, at Slater’s expense, a third-party neutral (the “Neutral”) to vet all undetermined Claims submitted by Slater to the Trust (including E.K.’s Claim) before those Claims proceeded to the Trust’s Claim determination team for its detailed review and determination. *Id.* at 1–2. Based on the Neutral’s vetting and review process, some Claims may pass through the process and proceed to the Trust for its regular Claims determination process. *Id.* at 2. Other Claims may be flagged for irregularities that require the Trust to further investigate the

Claim, obtain additional information from the Claimant or Slater, disallow the Claim, and/or take other action. *Id.*

On December 18, 2025, E.K.'s Claim was cleared by the Neutral. This means that E.K.'s Claim will pass through and proceed to the Trust for its regular Claims review process. To the extent the Trust has questions regarding E.K.'s Claim or requires additional information, it will work with E.K., through his counsel, to obtain such information and move towards fully processing his Claim. Otherwise, the Trust will evaluate E.K.'s Claim in accordance with the terms and procedures set forth in the Trust Distribution Procedures.

Dated: January 2, 2026
Wilmington, DE

A.M. SACCULLO LEGAL, LLC

/s/ Mark T. Hurford

Mark T. Hurford (DE Bar No. 3299)
27 Crimson King Drive
Bear, DE 19701
Telephone: (302) 836-8877
Facsimile: (302) 836-8787
Email: mark@saccullolegal.com

- AND -

GILBERT LLP

Kami E. Quinn (admission *pro hac vice*)
Emily P. Grim (admission *pro hac vice*)
Michael B. Rush (admission *pro hac vice*)
700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
Telephone: (202) 772-2200
Facsimile: (202) 772-3333
Email: quinnk@gilbertlegal.com
grime@gilbertlegal.com
rushm@gilbertlegal.com

*Attorneys for the Honorable Barbara J. Houser
(Ret.), in her capacity as Trustee of the BSA
Settlement Trust*

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

In re:

BOY SCOUTS OF AMERICA AND
DELAWARE BSA, LLC,

Debtors.

Chapter 11

Case No. 20-10343 (LSS)

(Jointly Administered)

CERTIFICATE OF SERVICE

I, Mark T. Hurford, of A.M. Saccullo Legal, LLC, hereby certify that on this date I caused a copy of the forgoing to be served upon the parties on the list attached hereto via email, where one is provided, and where no email is provided, via U.S. regular mail.

Dated: January 2, 2026
Wilmington, Delaware

A.M. SACCULLO LEGAL, LLC

/s/ Mark T. Hurford

Mark T. Hurford (DE Bar No. 3299)

Mary Augustine (DE Bar No. 4477)

27 Crimson King Drive

Bear, DE 19701

Telephone: (302) 836-8877

Facsimile: (302) 836-8787

Email: mark@saccullolegal.com

meg@saccullolegal.com

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Young Conaway Stargatt & Taylor
Attn: Edwin Harron
eharron@ycst.com

Young Conaway Stargatt & Taylor
Attn: Robert Brady
rbrady@ycst.com

Gilbert LLP
Attn: Emily P Grim
grime@gilbertlegal.com

Young Conaway Stargatt & Taylor
Attn: James L. Patton, Jr
jpatton@ycst.com

Balyeat, Leahy, Daley, Miller & Bensinger LLC
Attn: Douglas A. Dailey
doug@dadaleylaw.com

Gilbert LLP
Attn: Kami E Quinn
quinnk@gilbertlegal.com

JPMorgan Chase Bank, NA
Attn: Phil Martin
10 S Dearborn St
Mail Code II1-1415
Chicago, Il 60603

Cole Schotz P.C.
Attn: Seth Van Aalten, Esq.
svanaalten@coleschotz.com

Kramer Levin Naftalis & Frankel LLP
Attn: David E. Blabey Jr.
dblabe@kramerlevin.com

Kramer Levin Naftalis & Frankel LLP
Attn: Jennifer R. Sharret
jsharret@kramerlevin.com

Kramer Levin Naftalis & Frankel LLP
Attn: Megan M. Wasson
mwasson@kramerlevin.com

Kramer Levin Naftalis & Frankel LLP
Attn: Rachel Ringer
rringer@kramerlevin.com

Kramer Levin Naftalis & Frankel LLP
Attn: Thomas Moers Mayer
tmayer@kramerlevin.com

Buchalter, A Professional Corporation
Attn: Shawn M Christianson
schristianson@buchalter.com

Morris, Nichols, Arsht & Tunnell LLP
Attn: Andrew R. Remming
aremming@mnat.com

Morris, Nichols, Arsht & Tunnell LLP
Attn: Derek C. Abbott
dabbott@mnat.com

Norton Rose Fulbright US LLP
Attn: Kristian W Gluck
kristian.gluck@nortonrosefulbright.com

Norton Rose Fulbright US LLP
Attn: Ryan E Manns
ryan.manns@nortonrosefulbright.com

Norton Rose Fulbright Us LLP
Attn: Louis R Strubeck, Jr
louis.strubeck@nortonrosefulbright.com

Office of the United States Trustee
Attn: Timothy J Fox, Jr
Timothy.Fox@usdoj.gov

Office of the United States Trustee
Attn: Hannah M McCollum
hannah.mccollum@usdoj.gov

Plevin & Turner LLP
Attn: Mark D Plevin
mplevin@plevinturner.com

Plevin & Turner LLP
Attn: Tracie H Yoon
tyoon@plevinturner.com

US Attorney For Delaware
Attn: David C Weiss
usade.ecfbankruptcy@usdoj.gov

Internal Revenue Service
Centralized Insolvency Operation
P.O. Box 7346
Philadelphia, PA 19101-7346

A.M. Saccullo Legal, LLC
Attn: Mark Hurford
mark@saccullolegal.com

A.M. Saccullo Legal, LLC
Attn: Anthony Saccullo
ams@saccullolegal.com

A.M. Saccullo Legal, LLC
Attn: Mary Augustine
meg@saccullolegal.com

Womble Bond Dickinson (US) LLP
Attn: Matthew P Ward
matthew.ward@wbd-us.com

Womble Bond Dickinson (US) LLP
Attn: Morgan L Patterson
morgan.patterson@wbd-us.com

Wachtell, Lipton, Rosen & Katz
Attn: Richard Mason
rgmason@wlrk.com

Wachtell, Lipton, Rosen & Katz
Attn: Joseph C. Celentino
jccelentino@wlrk.com

Wachtell, Lipton, Rosen & Katz
Attn: Douglas Mayer
dkmayer@wlrk.com

Porter Malouf, P.A.
Attn: Suzanne Elizabeth Smith
P.O. Box 12768
Jackson, MS 39236
ssmith@portermalouf.com

Paul Hastings LLP
Attn: Kristopher M. Hansen, Esq.
krishansen@paulhastings.com

The County Commission Of Fayette County
Attn: President
P.O. Box 307
Fayetteville, WV 25840

Paul Hastings LLP
Attn: Matthew M. Murphy, Esq.
mattmurphy@paulhastings.com

The County Commission Of Fayette County
c/o Steptoe & Johnson Plc
Attn: John Stump, Esq
Chase Tower - 8th Fl
707 Virginia St E.
Charleston, WV 25301

United States Dept Of Justice
950 Pennsylvania Ave NW, Rm 2242
Washington, DC 20530-0001

Reed Smith LLP
Attn: Kurt F. Gwynne
kgwynne@reedsmith.com

Reed Smith LLP
Attn: Mark W. Eckard
meckard@reedsmith.com

Smith, Katzenstein & Jenkins LLP
Attn: Kelly A Green
kag@skjlaw.com

Smith, Katzenstein & Jenkins LLP
Attn: Kathleen M Miller
kmiller@skjlaw.com

Squire Patton Boggs (US) LLP
Attn: Mark A Salzberg
mark.salzberg@squirepb.com

White & Case LLP
Attn: Michael C. Andolina
mandolina@whitecase.com

White & Case LLP
Attn: Matthew E. Linder
mlinder@whitecase.com

Tybout, Redfearn & Pell
Attn: Robert M. Greenberg
rgreenberg@trplaw.com

Hogan, McDaniel
Attn: Daniel K. Hogan
dkhogan@dkhogan.com

Law Office of Susan E. Kaufman, LLC
Attn: Susan E. Kaufman
skaufman@skaufmanlaw.com

Robert & Robert PLLC
Attn: Clifford S. Robert
crobert@robertlaw.com

Weller, Green, Toups & Terrell, LLP
Attn: Mitchell A. Toups
matoups@wgttlaw.com

Bass Law, LLC
Attn: Dondra Bass O'Neal
dondra@bassinjurylaw.com

Bielli & Klauder, LLC
Attn: David M. Klauder
dklauder@bk-legal.com

Choate Hall & Stewart LLP
Attn: Douglas R. Gooding
dgooding@choate.com

Marc J Bern & Partners LLP
Attn: Joseph J. Cappelli
jcappelli@bernllp.com

Mintz, Levin, Cohn, Ferris, Glovsky & Popeo PC
Attn: Kim V. Marrkand
KVMarrkand@mintz.com

Seitz, Van Ogtrop & Green, PA
Attn: R. Karl Hill
khill@svglaw.com

Sullivan, Hazeltine, Allinson LLC
Attn: William D. Sullivan
bsullivan@sha-llc.com

Morelli Law Firm PLLC
Attn: Danielle H. Lamberg
dlamberg@morellilaw.com

E.K.

[REDACTED]
[REDACTED]
[REDACTED]