

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

In re:

BOY SCOUTS OF AMERICA AND  
DELAWARE BSA, LLC,

Debtors.<sup>1</sup>

Chapter 11

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

**NOTICE OF ISSUES WITH TRUST CLAIM SUBMISSIONS**  
**BY SLATER SLATER SCHULMAN LLP**

The Honorable Barbara J. Houser (Ret.) (the “**Trustee**”), in her capacity as trustee of the BSA Settlement Trust (the “**Trust**”), and Slater Slater Schulman LLP (the “**Slater Firm**”) hereby file this Notice to apprise the Court of irregularities the Trust identified in the population of claims submitted to the Trust by the Slater Firm.

The Trust advised the Slater Firm in June 2024 that it believed there were irregularities in some of the Slater Firm’s claim submissions to the Trust. The Trust paused the processing of all Matrix claims submitted by the Slater Firm while an investigation of the irregularities was conducted.<sup>2</sup> The Trust has confirmed, and the Slater Firm now agrees, that there are procedural and factual problems in some of the Slater Firm’s claim submissions to the Trust.

As a result of the Trust’s initial investigation, the Trust and the Slater Firm hired, at the Slater Firm’s expense, an independent third party (the “**Neutral**”) to (i) review documents the Trust asked the Slater Firm to produce, (ii) identify documents that may be relevant to the Trust’s claim determination process, and (iii) facilitate production of those documents to the Trust in a

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<sup>1</sup> 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.

<sup>2</sup> This excludes certain Exigent Health claims, which the Trust concluded were appropriate to process before the investigation concluded given the claimant’s circumstances. However, each such claimant was interviewed by the Trust as part of its determination process.

manner that would preserve any applicable attorney-client and/or work product privileges and protections. When the Slater Firm recently acknowledged that there are problems in some of its claim submissions to the Trust, the Trust and the Slater Firm further agreed that the Neutral would vet all undetermined claims submitted by the Slater Firm to the Trust before those claims could proceed to the Trust's claims determination team for its detailed review and determination. The Neutral's vetting process will include a review of internal documents and communications that the Slater Firm produced in response to the Trust's document production request as relevant to each undetermined claim submitted by the Slater Firm to the Trust. The Neutral will also have access to all documents submitted to the Trust by the Slater Firm on behalf of each such Claimant.

Some claim submissions may pass through the Neutral's vetting and review process and proceed on to the Trust for its regular claims determination process (which itself includes safeguards to identify fraud or other issues). Other claim submissions may be flagged for irregularities that require the Trust to further investigate the claim, obtain additional information from the Claimant or the Slater Firm, disallow the claim, and/or take other action.

The Trust remains committed to the diligent application of its fraud protocol, as approved by this Court, to all claims it is tasked with evaluating. The identification of the irregularities in the Slater Firm's claim population confirms the effectiveness of the Trust's fraud protocol.

Dated: September 9, 2025  
Wilmington, Delaware

**A.M. SACCULLO LEGAL, LLC**

*/s/ Mark T. Hurford*

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Settlement Trust*

**LAW OFFICE OF SUSAN E. KAUFMAN, LLC**

*/s/ Susan E. Kaufman*

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