

September 2, 2025

The Honorable Scott S. Harris
Clerk of the Court
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20543

Re: *In re Boy Scouts of America and Delaware BSA LLC*, No. 25A-_____

Dear Mr. Harris:

We are counsel to respondents the Boy Scouts of America (BSA) and Delaware BSA LLC—the reorganized debtors in this Chapter 11 case. BSA joins the supermajority of scouting abuse survivors in urging this Court to require Applicants to expeditiously submit their petition for writ of certiorari.*

BSA’s reorganization plan establishes one of the largest sexual abuse compensation funds in U.S. history. The plan also makes it possible for this 115-year-old congressionally chartered charitable institution to continue its vital work supporting American families. BSA’s plan has already been effective for more than *two years*, and more than \$200 million in initial disbursements have been made to nearly 28,000 abuse survivors. The plan provides the same compensation for Applicants as for other similarly situated survivors. And Applicants represent less than one-tenth of one percent of survivors who filed claims in BSA’s Chapter 11 case.

The court of appeals’ opinion rejecting Applicants’ appeal of BSA’s reorganization plan is thorough and well-reasoned. It does not warrant further review under the standard in this Court’s Rule 10. If this Court denies Applicants’ petition for a writ of certiorari, then that order will end the litigation challenging BSA’s plan and unlock more than \$1.65 billion of additional funding for survivors, finally affording them full and long-awaited compensation and closure. But time is of the essence. Because more than 80% of survivors allege abuse occurring before 1988, the survivor population is elderly, and many are in failing health. As the survivors’ letter explains, thousands of survivors have died during this litigation—including many who have died during Applicants’ appeals.

BSA does not oppose a 30-day extension of time for Applicants to prepare their petition for a writ of certiorari. But any further extension beyond 30 days would prejudice the survivors and BSA. There are many respondents to this proceeding, as shown by Applicants’ eight-page certificate of service attached to their Application. For Applicants to take 150 days to prepare their petition—leaving just a little over one month for all respondents to prepare their briefs in response before the mid-December 2025 term cutoff—would be inequitable.

* We are authorized to represent that respondents the Ad Hoc Committee of Local Councils, the Future Claimants’ Representative, and Hartford join in BSA’s request here.

September 2, 2025

Page 2

To ensure that survivors' compensation is not further unduly delayed, and to ensure that all responses to the petition for certiorari can be submitted to this Court in time for the petition to be considered for the 2025–2026 term, BSA respectfully requests that this Court deny Applicants' request for a 60-day extension and instead allow no more than 30 days. The interests of justice strongly favor concluding Applicants' appellate proceedings as swiftly as possible.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael R. Huston".

Michael R. Huston

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cc: Counsel for all Parties