

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

John Doe v. Boy Scouts of America, et al.

Doe · No. 4:20-cv-0272-MTS · Decided February 13, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri addresses the status of a civil action that had been stayed during the bankruptcy of the Boy Scouts of America. Following the Supreme Court’s denial of a certiorari petition concerning the bankruptcy reorganization, the court concludes that the plaintiff failed to explain why the action could remain open and dismisses the case without prejudice.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	February 13, 2026
DOCKET	4:20-cv-0272-MTS
DISPOSITION	dismissed
PROCEDURAL POSTURE	The action had been stayed for nearly six years because of Boy Scouts of America's Chapter 11 bankruptcy. After the Supreme Court denied a certiorari petition challenging the reorganization, the court directed the parties to provide status updates and considered whether the action should remain open.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	John Doe v. Boy Scouts of America, et al.

TOPICS

- bankruptcy
- chapter 11
- injunctions
- civil procedure

PRACTICE AREAS

- Bankruptcy
- Civil procedure
- Bankruptcy reorganization

QUESTIONS PRESENTED

1. Whether the action should remain open or be dismissed after completion of Boy Scouts of America's Chapter 11 reorganization and entry of a channeling injunction.
2. Whether the plaintiff's belated and procedurally deficient status update sufficiently justified continuing the stay.

HOLDINGS

1. Because the plaintiff failed to sufficiently explain why the action could remain open after the finality of the Chapter 11 reorganization and channeling injunction, the court dismissed the action without prejudice.
2. The plaintiff's belated status update did not sufficiently explain why the case should remain open, and the court did not treat the filing as a properly presented motion.

KEY QUOTATIONS

“Because Plaintiff's belated filing fails to sufficiently explain why this case may remain open, the Court will enter herewith an Order of Dismissal, which shall dismiss it without prejudice.” (at 2)

FACTUAL BACKGROUND

The action had been stayed for just shy of six years due to Boy Scouts of America's bankruptcy and Chapter 11 reorganization. After the Supreme Court denied a petition challenging the reorganization, the defendant asserted that the channeling injunction barred further prosecution, while the plaintiff requested that the stay continue until his claims were satisfied by the BSA Administrative Trustee.

PROCEDURAL HISTORY

The case was stayed during the bankruptcy and reorganization of Defendant Boy Scouts of America. Following the Supreme Court's denial of certiorari, the defendant advised that the channeling injunction required dismissal, while the plaintiff sought continuation of the stay. The court found the plaintiff's late filing procedurally deficient and dismissed the action without prejudice.

DISPOSITION

dismissed

CASES CITED

- In re Boy Scouts of Am., 1:20-bk-10343-LSS (Bankr. D. Del. filed Feb. 18, 2020)
- Lujan Claimants v. Boy Scouts of Am., No. 25-490, 2026 WL 79599 (U.S. Jan. 12, 2026)
- In re Pan Am Corp., 130 B.R. 409, 415 (S.D.N.Y. 1991)

OPINION

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN
DIVISION JOHN DOE,)) Plaintiff,)) vs.) Case No. 4:20-cv-0272-MTS) BOY SCOUTS OF
AMERICA, et al.,)) Defendants.) MEMORANDUM OPINION This action has been stayed for
just shy of six years due to the bankruptcy of Defendant Boy Scouts of America.

In re Boy Scouts of Am., 1:20-bk-10343-LSS (Bankr. D. Del. filed Feb. 18, 2020). On January 07,
2026, Defendant Boy Scouts of America filed a jointly signed status update in this action
informing the Court that dissenting claimants had filed a petition for a writ of certiorari with the
Supreme Court that challenged the Defendant's Chapter 11 reorganization.

Doc. [29]. Days later, the Supreme Court denied the petition. Lujan Claimants v. Boy Scouts of
Am., No. 25-490, 2026 WL 79599 (U.S. Jan. 12, 2026). This Court then ordered the parties, no
later than February 12, 2026, to submit a status update on the matter given the Supreme Court's
denial of the petition. Doc.

[30]. Only Defendant timely did so. Defendant maintains that the Supreme Court's denial of
certiorari "enjoin[ed] further prosecution of this action and requires that the case be dismissed."
Doc. [31] ¶ 15. After the Court's ordered deadline had passed—and without explanation,
justification, or even acknowledgement of the tardiness—Plaintiff filed his status update.

But see Fed. R. Civ. P. 6(b)(1)(B). In it, he "move[d]" that the Court "stay further actions until
such time as the Plaintiffs [sic] claims have been satisfied by the BSA Administrative Trustee."
Doc. [32] 420. But see E.D. Mo. L.R. 4.01(A) (governing how to make motions in this Court).
Plaintiff provided no explanation why this case should— or even can—remain open given the
finality of the reorganization and the channeling injunction.

See 11 U.S.C. § 105(a); see also In re Pan Am Corp., 130 B.R. 409, 415 (S.D.N.Y. 1991) ("In
general, a bankruptcy court has the power under § 105(a) to enjoin proceedings that affect
property of the estate and channel claims against property of the estate into the bankruptcy
forum.").

Because Plaintiff's belated filing fails to sufficiently explain why this case may remain open, the
Court will enter herewith an Order of Dismissal, which shall dismiss it without prejudice. Dated
this 13th day of February 2026.) dl UNITED STATES DISTRICT JUDGE _2-