

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PRECEDENTIAL VALUE	unpublished district court opinion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)