Exhibit 2
Josh,

Per our discussion, please see below.

Thanks,

Adrian

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Jim,

I wanted to follow-up on our discussion from a few weeks ago regarding the [redacted] and raise an additional issue.

Second, BSA is in the process of seeking to mediate several, additional claims that trigger Hartford’s coverage obligations. Specifically, there are approximately 240 claims that allege abuse ranging between 1971 and 1975. Based on Hartford’s position that all but its 1971 policies are exhausted as a result of its erroneous interpretation of the term “occurrence” (which, as you know, is the subject of litigation) and Hartford’s failure to fund the [redacted] referenced above, Hartford has waived any cooperation or consent requirements under both its primary and umbrella policies and thus has no right to participate in any mediation with these additional claimants. Indeed, Hartford has no right or interest in mediation over claims which Hartford has made clear it will not cover under its policies.

Notwithstanding the foregoing, BSA hereby provides notice to Hartford of these additional claims and the proposed mediation. Further, if Hartford (1) drops its erroneous single occurrence position and agrees to fund [redacted] of these additional claims in accordance with each of its policies (specifically recognizing that each claimant alleging sexual
abuse constitutes a separate occurrence) and (2) agrees to fund the as demanded above, BSA will provide information relevant to these claimants and the proposed mediation.

Please let us know Hartford’s position regarding funding of; and (2) the proposed mediations with the additional claimants who allege abuse ranging from 1971 to 1975. Please note that with respect to the proposed mediation, that mediation is likely to occur in the near term and if Hartford is willing to fulfill its contractual obligations as set forth above, then we need to know immediately.

Please let us know if you have any questions or would like to discuss.

Ernest

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