

Exhibit A

Proposed Order

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

In re:

MAREMONT CORPORATION, et al.,¹

Debtors.

Chapter 11

Case No. 19-____ (____)

(Jointly Administered)

Ref. Docket No. __

ORDER (I) AUTHORIZING THE FILING OF A LIST OF (A) THE TWENTY-FIVE LAW FIRMS REPRESENTING THE LARGEST NUMBERS OF ASBESTOS PLAINTIFFS ASSERTING CLAIMS AGAINST THE DEBTORS AND (B) THE UNSECURED CREDITORS OF THE DEBTORS, (II) AUTHORIZING THE LISTING OF ADDRESSES OF COUNSEL FOR ASBESTOS CLAIMANTS IN CREDITOR MATRIX IN LIEU OF CLAIMANTS' ADDRESSES, (III) APPROVING NOTICE PROCEDURES FOR SUCH CLAIMANTS, AND (IV) GRANTING RELATED RELIEF

Upon the motion (the "Motion")² of Maremont Corporation and its affiliated debtors and debtors in possession (collectively, the "Debtors") in the above-captioned chapter 11 cases (the "Chapter 11 Cases") for entry of an order (this "Order") (i) authorizing the Debtors to file (a) the Top Asbestos Counsel List and (b) the Unsecured Creditors List, in lieu of the Top Twenty List, (ii) authorizing the Debtors to list the addresses of counsel for asbestos claimants in the creditor matrix in lieu of claimants' addresses, (iii) approving notice procedures for asbestos claimants, and (iv) granting related relief; and upon consideration of the Motion and all pleadings related thereto; and upon consideration of the First Day Declaration; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of this proceeding and the Motion being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor's federal taxpayer identification number, are: Maremont Corporation (6138); Maremont Exhaust Products, Inc. (9284); AVM, Inc. (9285); and Former Ride Control Operating Company, Inc. (f/k/a ArvinMeritor, Inc., a Delaware corporation) (9286). The mailing address for each Debtor for purposes of these chapter 11 cases is 2135 West Maple Road, Troy, MI 48084.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

appropriate notice of and the opportunity for a hearing on the Motion having been given and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court; and all objections, if any, to the Motion having been withdrawn, resolved or overruled; and the relief requested in the Motion being in the best interests of the Debtors' estates, their creditors and other parties in interest; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

1. The relief requested in the Motion is **GRANTED** as set forth herein.
2. Debtors are authorized to file a single consolidated list of the twenty-five (25) law firms with the largest number of open and active representations of parties with asbestos claims against the Debtors and a single consolidated list of known creditors holding unsecured claims against the Debtors other than asbestos-related claims, in lieu of filing a list of the individual holders of the twenty largest unsecured claims for each Debtor.
3. The Debtors are authorized to list the addresses of counsel of record of the asbestos claimants in the Debtors' creditor matrix in lieu of listing the individual claimants' addresses.
4. The Debtors are authorized to implement the Asbestos Claimant Notice Procedures, such that the Debtors will provide (or direct the Court-appointed Claims and Noticing Agent to provide) all notices, mailings and other communications that are required to be served on all asbestos claimants to the respective counsel of record for the asbestos claimants,

to the extent available and based upon the information available to the Debtors, in the manner required pursuant to otherwise applicable noticing procedures in effect in the Chapter 11 Cases.

5. The Debtors need not provide further notice to asbestos claimants beyond the notice set forth in the Asbestos Claimant Notice Procedures.

6. The Debtors are authorized to take all action necessary to effectuate the relief granted in this Order in accordance with the Motion.

7. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation and enforcement of this Order.

Dated: _____, 2019
Wilmington, Delaware

UNITED STATES BANKRUPTCY JUDGE