

**Exhibit A**

**Proposed Order**

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

In re:

MAREMONT CORPORATION, et al.,<sup>1</sup>

Debtors.

Chapter 11

Case No. 19-10118 (LSS)

(Jointly Administered)

Ref. Docket No. \_\_

**ORDER DIRECTING CLERK OF BANKRUPTCY COURT TO TRANSMIT  
RECORD REGARDING CONFIRMATION OF PLAN TO DISTRICT COURT**

Upon the certification of counsel, dated May 24, 2019 (the “Certification of Counsel”)<sup>2</sup> filed by the Debtors; and this Court having entered the *Findings of Fact, Conclusions of Law and Order (I) Approving the Adequacy of the Disclosure Statement, (II) Approving the Prepetition Solicitation Procedures, and (III) Confirming the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 241] (the “Confirmation Order”); and this Court having recommended that the District Court enter an order issuing and affirming the Asbestos Personal Injury Channeling Injunction set forth in the Plan and paragraphs 176–177 of the Confirmation Order and adopting the Findings of Fact and Conclusions of Law incorporated by reference therein with respect to compliance with the requirements of section 524(g) pursuant to section 524(g)(3) of the Bankruptcy Code; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor,

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<sup>1</sup> 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.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Certification of Counsel.

**IT IS HEREBY ORDERED THAT:**

1. The Clerk of the United States Bankruptcy Court for the District of Delaware shall transmit the record related to the *Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 241] to the United States District Court for the District of Delaware, which record shall include the documents identified on **Exhibit 1** hereto.

2. The Debtors are authorized to take all steps necessary or appropriate to carry out this Order.

3. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: May \_\_\_\_, 2019  
Wilmington, Delaware

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THE HONORABLE LAURIE SELBER SILVERSTEIN  
UNITED STATES BANKRUPTCY JUDGE

**Exhibit 1**

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

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| <p>In re:</p> <p>MAREMONT CORPORATION, <u>et al.</u>,<sup>1</sup></p> <p style="text-align: center;">Debtors.</p> |
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Chapter 11

Case No. 19-10118 (LSS)

(Jointly Administered)

**INDEX OF RECORD WITH RESPECT TO CONFIRMATION  
OF MODIFIED JOINT PREPACKAGED PLAN OF REORGANIZATION  
OF MAREMONT CORPORATION AND ITS DEBTOR AFFILIATES  
PURSUANT TO CHAPTER 11 OF THE BANKRUPTCY CODE**

| Date       | Docket No. | Document   |
|------------|------------|--|
| 01/22/2019 | 10         | Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code   |
| 01/22/2019 | 11         | Disclosure Statement for the Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code  |
| 01/22/2019 | 12         | Declaration of Jung W. Song of Donlin, Recano & Company, Inc. Regarding Solicitation of Votes and Tabulation of Ballots Cast on the Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code   |
| 01/23/2019 | 30         | Order (I) Scheduling Combined Hearing to Consider Approval of Disclosure Statement and Confirmation of Prepackaged Plan, (II) Establishing the Plan and Disclosure Statement Objection Deadline and Related Procedures, (III) Approving the Solicitation Procedures and Forms of Ballots, (IV) Approving the Form and Manner of Notice of the Combined Hearing, Objection Deadline, and Notice of Commencement, (V) Conditionally Directing that a Meeting of Creditors Not Be Convened, (VI) Conditionally Extending Deadline to File Schedules and Statements, and (VII) Granting Related Relief |

<sup>1</sup> 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.

| Date       | Docket No. | Document  |
|------------|------------|---|
| 01/24/2019 | 33         | Notice of (I) Commencement of Prepackaged Chapter 11 Bankruptcy Cases, (II) Combined Hearing to Consider Approval of Disclosure Statement, Confirmation of Prepackaged Plan of Reorganization, and Related Matters, (III) Objection Deadline and Related Procedures, and (IV) Summary of the Plan   |
| 01/30/2019 | 39         | Mealey's Asbestos Bankruptcy Report Affidavit of Publication of the Notice of (I) Commencement of Prepackaged Chapter 11 Bankruptcy Cases, (II) Combined Hearing To Consider Approval of Disclosure Statement, Confirmation of Prepackaged Plan of Reorganization, and Related Matters, (III) Objection Deadline and Related Procedures, and (IV) Summary of the Plan |
| 01/30/2019 | 40         | USA Today Affidavit of Publication of the Notice of (I) Commencement of Prepackaged Chapter 11 Bankruptcy Cases, (II) Combined Hearing to Consider Approval of Disclosure Statement, Confirmation of Prepackaged Plan of Reorganization, and Related Matters, (III) Objection Deadline and Related Procedures, and (IV) Summary of the Plan                           |
| 01/30/2019 | 41         | Mealy's Litigation Report Affidavit of Publication of the Notice of (I) Commencement of Prepackaged Chapter 11 Bankruptcy Cases, (II) Combined Hearing to Consider Approval of Disclosure Statement, Confirmation of Prepackaged Plan of Reorganization, and Related Matters, (III) Objection Deadline and Related Procedures, and (IV) Summary of the Plan           |
| 01/30/2019 | 42         | The Wall Street Journal Affidavit of Publication of the Notice of (I) Commencement of Prepackaged Chapter 11 Bankruptcy Cases, (II) Combined Hearing to Consider Approval of Disclosure Statement, Confirmation of Prepackaged Plan of Reorganization, and Related Matters, (III) Objection Deadline and Related Procedures, and (IV) Summary of the Plan             |
| 01/30/2019 | 43         | The New York Times Affidavit of Publication of the Notice of (I) Commencement of Prepackaged Chapter 11 Bankruptcy Cases, (II) Combined Hearing to Consider Approval of Disclosure Statement, Confirmation of Prepackaged Plan of Reorganization, and Related Matters, (III) Objection Deadline and Related Procedures, and (IV) Summary of the Plan                  |
| 02/15/2019 | 65         | Plan Supplement to the Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates   |

| <b>Date</b> | <b>Docket No.</b> | <b>Document</b>   |
|-------------|-------------------|---|
| 02/15/2019  | 66                | Notice of Filing of Plan Supplement to the Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates   |
| 03/04/2019  | 112               | Objection of the Acting United States Trustee to the Disclosure Statement and Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (D.I. 10, 11)  |
| 03/12/2019  | 136               | Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code   |
| 03/12/2019  | 137               | Notice of Filing of Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code   |
| 03/12/2019  | 138               | Notice of Filing of Blackline of Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates and Revised Certain Exhibits   |
| 03/12/2019  | 139               | Declaration of Carl D. Anderson, II in Support of the Adequacy of the Disclosure Statement and Confirmation of the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code  |
| 03/12/2019  | 140               | Declaration of James L. Patton, Jr. in Support of the Adequacy of the Disclosure Statement and Confirmation of the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code  |
| 03/12/2019  | 141               | Response of the Official Committee of Asbestos Claimants to the Objection of the Acting United States Trustee to the Disclosure Statement and Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code  |
| 03/12/2019  | 142               | Notice of Filing of Proposed Findings of Fact, Conclusions of Law and Order (I) Approving the Adequacy of the Disclosure Statement, (I) Approving the Prepetition Solicitation Procedures, and (III) Confirming the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code |

| Date       | Docket No. | Document  |
|------------|------------|---|
| 03/13/2019 | 143        | Memorandum of Law in Support of Entry of an Order Approving the Adequacy of the Disclosure Statement and Confirming the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code   |
| 03/13/2019 | 144        | Debtors' Ex Parte Motion For Leave to Exceed Page Limit Requirements With Respect to Memorandum of Law in Support of Entry of an Order Approving the Adequacy of the Disclosure Statement and Confirming the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code                |
| 03/13/2019 | 145        | Compendium of Unreported Authorities Cited in Debtors' Memorandum of Law in Support of Entry of an Order Approving the Adequacy of the Disclosure Statement and Confirming the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code  |
| 03/13/2019 | 149        | Order Granting Ex Parte Motion For Leave to Exceed Page Limit Requirements With Respect to Memorandum of Law in Support of Entry of an Order Approving the Adequacy of the Disclosure Statement and Confirming the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code          |
| 03/17/2019 | 155        | Notice of Filing of Black Line of Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates and Exhibit   |
| 03/17/2019 | 158        | Notice of Filing of Revised Proposed Findings of Fact, Conclusions of Law and Order (I) Approving the Adequacy of the Disclosure Statement, (I) Approving the Prepetition Solicitation Procedures, and (III) Confirming the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code |
| 03/19/2019 | 166        | Transcript of March 18, 2019 Combined Hearing to Consider the Adequacy of the Disclosure Statement and Confirmation of the Plan   |
| 04/24/2019 | 210        | Notice of Continued Combined Hearing  |
| 05/14/2019 | 222        | Notice of Filing of Black Line of Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates and Exhibit   |



| Date       | Docket No. | Document  |
|------------|------------|---|
| 05/14/2019 | 223        | Notice of Filing of Revised Proposed Findings of Fact, Conclusions of Law and Order (I) Approving the Adequacy of the Disclosure Statement, (I) Approving the Prepetition Solicitation Procedures, and (III) Confirming the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code         |
| 05/17/2019 | 238        | Certification of Counsel Regarding Proposed Findings of Fact, Conclusions of Law and Order (I) Approving the Adequacy of the Disclosure Statement, (II) Approving the Prepetition Solicitation Procedures, and (III) Confirming the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code |
| 05/17/2019 | 241        | Findings of Fact, Conclusions of Law and Order (I) Approving the Adequacy of the Disclosure Statement, (II) Approving the Prepetition Solicitation Procedures, and (III) Confirming the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code   |
| 05/22/2019 | 249        | Transcript of April 23, 2019 Telephonic Status Conference Before the Honorable Kevin J. Carey, United States Bankruptcy Judge   |
| 05/22/2019 | 250        | Transcript of May 14, 2019 Combined Hearing to Consider the Adequacy of the Disclosure Statement and Confirmation of the Modified Plan  |