

Exhibit A

Proposed Order

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

In re:

MAREMONT CORPORATION, et al.,¹

Reorganized Debtors.

Chapter 11

Case No. 19-10118 (LSS)

(Jointly Administered)

RE: Docket No. _____

**ORDER (I) GRANTING FINAL DECREE CLOSING THE CHAPTER 11
CASES AND (II) TERMINATING CLAIMS AND NOTICING SERVICES**

Upon consideration of the motion (the "Motion")² of the Reorganized Debtors, pursuant to sections 105(a) and 350(a) of the Bankruptcy Code, Bankruptcy Rule 3022 and Local Rules 2002-1(f) and 3022-1; and it appearing that the estates of the Reorganized Debtors have been fully administered; and the Court having found that good and sufficient cause exists for granting the Motion,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The case of Maremont Corporation, Case No. 19-10118 (LSS), is hereby closed effective upon the entry of this Order, subject to the matters provided for in decretal paragraph 6 below.
3. The case of Maremont Exhaust Products, Inc., Case No. 19-10119 (LSS), is hereby closed effective upon the entry of this Order.

¹ The Reorganized Debtors in these chapter 11 cases, together with the last four digits of each Reorganized 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 the Reorganized Debtors for purposes of these chapter 11 cases is 7324 Gaston Avenue, Suite 124, LB 430, Dallas, Texas 75214.

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

4. The case of AVM, Inc., Case No. 19-10120 (LSS), is hereby closed effective upon the entry of this Order.

5. The case of Former Ride Control Operating Company, Inc., Case No. 19-10121 (LSS), is hereby closed effective upon the entry of this Order.

6. The Clerk of the Court shall accept for filing on the docket of Maremont Corporation's case (Case No. 19-10118 (LSS)), without the requirement that any party in interest seek to reopen Maremont Corporation's case, any pleading or report submitted by the Maremont Asbestos Personal Injury Trust ("Trust"), the Trustee for the Trust, the Asbestos Personal Injury Trust Advisory Committee, the Post-Effective Date Future Claimants' Representative, the Reorganized Debtors or a party affected by the Trust.

7. Within thirty (30) days of entry of this Order, the Reorganized Debtors shall (i) file any and all outstanding monthly operating reports including a post-confirmation quarterly report for the portion of the third quarter of calendar year 2019 during which the Chapter 11 Cases remained open and (ii) pay any and all Section 1930 Fees that are due and owing for such time period. The Office of the United States Trustee for the District of Delaware reserves the right to, *inter alia*, move to reopen the Chapter 11 Cases in the event that any such reports are not submitted and any and all Section 1930 Fees have not been paid on a timely basis.

8. The Services provided in the Chapter 11 Cases by DRC are terminated in accordance with the Motion and this Order. Thereafter, DRC shall have no further obligations to this Court, the Debtors, the Reorganized Debtors, or any other party in interest in the Chapter 11 Cases with respect to any Services.

9. Pursuant to Local Rule 2002-1(f)(ix), within twenty-eight (28) days of entry of this Order, DRC shall (a) forward to the Clerk an electronic version of all imaged claims; (b)

upload the creditor mailing list into CM/ECF; and (c) docket the final claims register. DRC also shall box and deliver all original claims to the Philadelphia Federal Records Center, 14700 Townsend Road, Philadelphia, Pennsylvania 19154 and docket a completed SF-135 Form indicating the accession and location numbers of the archived claims. All tasks performed by DRC pursuant to this paragraph 9 shall be at the Reorganized Debtors' expense and shall be paid by the Reorganized Debtors on a timely basis upon receipt of a final invoice from DRC.

10. Within thirty (30) days of entry of this Order, DRC shall remove the Debtors' case website.

11. Should DRC receive any mail regarding the Reorganized Debtors or the Debtors after entry of this Order, DRC shall collect and forward such mail no less frequently than once a month to the Reorganized Debtors at the following address (or such other address as may be subsequently provided by the Reorganized Debtors to DRC): Reorganized Debtors, Attn: Alan Rich, 7324 Gaston Avenue, Suite 124, LB 430, Dallas, Texas 75214.

12. The Reorganized Debtors and their agents are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

13. The terms and conditions of this Order will be immediately effective and enforceable upon its entry.

14. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation or enforcement of the Plan, the Confirmation Order, the Asbestos Personal Injury Channeling Injunction, the Trust, and this Order.

Dated: September ____, 2019
Wilmington, Delaware

The Honorable Laurie Selber Silverstein
United States Bankruptcy Judge