

EXHIBIT A

Proposed Order

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

In re

NEWBURY COMMON ASSOCIATES, LLC,
et al.,

Debtors.¹

Chapter 11

Case No. 15-12507 (LSS)

Jointly Administered

**ORDER GRANTING MOTION OF CERTAIN INVESTORS TO FILE UNDER SEAL
CERTAIN EXHIBITS AND PORTIONS OF THE MOTION FOR AN ORDER
APPOINTING AN OFFICIAL COMMITTEE OF INVESTORS**

Upon the motion (the “Motion to Seal”)² of certain non-insider investors (the, “Investors”) for entry of an order (this “Order”), pursuant to section 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1(b), (a) authorizing the Investors to file a redacted version of the *Motion of Certain Investors for an Order Appointing an Official Committee of Investors* (the “Motion”), (b) authorizing the Investors to file under seal (i) an unredacted version of the Motion and (ii) unredacted versions of confidential exhibits to letters from the Investors to the U.S. Trustee attached as Exhibit B to the Motion (the “Confidential

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number, are: Newbury Common Associates, LLC (3783); Seaboard Realty, LLC (6291); 600 Summer Street Stamford Associates, LLC (6739); Seaboard Hotel Member Associates, LLC (8984); Seaboard Hotel LTS Member Associates, LLC (6005); Park Square West Member Associates, LLC (9223); Seaboard Residential, LLC (2990); One Atlantic Member Associates, LLC (4120); 88 Hamilton Avenue Member Associates, LLC (5539); 316 Courtland Avenue Associates, LLC (0290); 300 Main Management, Inc. (6365); 300 Main Street Member Associates, LLC (2334); PSWMA I, LLC (6291); PSWMA II, LLC (6291); Tag Forest, LLC (8974); Newbury Common Member Associates, LLC (3909); Century Plaza Investor Associates, LLC (1480); Seaboard Hotel Associates, LLC (2281); Seaboard Hotel LTS Associates, LLC (8811); Park Square West Associates, LLC (9781); Clocktower Close Associates, LLC (3154); One Atlantic Investor Associates, LLC (7075); 88 Hamilton Avenue Associates, LLC (5749); 220 Elm Street I, LLC (7540); and 300 Main Street Associates, LLC (8501). The Debtors’ corporate headquarters is located at, and the mailing address for each Debtor is, 1 Atlantic Street, Stamford, CT 06901

² Capitalized terms used but not defined herein are defined in the Motion to Seal.

Exhibits”), and (c) granting such other and further relief as the Court deems just and proper; and the Court having found that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the Motion to Seal in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Motion to Seal is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and the Court having reviewed the Motion to Seal; and the Court having determined that the legal and factual bases set forth in the Motion to Seal establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion to Seal is GRANTED as set forth herein.
2. Pursuant to section 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1, the Investors are authorized to (a) file a redacted version of the Motion and (b) file under seal (i) an unredacted version of the Motion and (ii) the Confidential Exhibits.
3. The Clerk of the Court is directed to maintain the unredacted versions of the Motion and the Confidential Exhibits under seal and shall not make them publicly available, unless and until permitted by further order of this Court.

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4. The Court shall retain jurisdiction with respect to all matters arising from or related to the interpretation or implementation of this Order.

Dated: _____, 2016
Wilmington, Delaware

HONORABLE LAURIE SELBER SILVERSTEIN
UNITED STATES BANKRUPTCY JUDGE