

Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re

NEWBURY COMMON ASSOCIATES,
LLC, ET AL

Debtors.¹

Chapter 11

Case No. 15-12507 (LSS)

Jointly Administered

Re: D.I. _____

**ORDER GRATING A. PAPPAJOHN COMPANY'S MOTION FOR
ENLARGEMENT OF TIME TO MARCH 1, 2017 TO FILE AN ADVERSARY
PROCEEDING CHALLENGING THE AMOUNT, VALIDITY, OR ENFORCEABILITY
OF THE SECURED OBLIGATIONS OR THE PERFECTION OR PRIORITY OF
THE PRE-PETITION LIENS IN AND TO THE PREPETITION COLLATERAL**

Upon the motion [D.I. ____] (the "Motion") of A. Pappajohn Company (the "APC"), for entry of an order (this "Order") enlarging the time APC has to file an adversary proceeding challenging the amount, validity, or enforceability of the Secured Obligations or the perfection or the priority of the IDB Mortgage (as defined in the Motion); it appearing that this Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that venue of the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it

¹ The "**Original Debtors**" in these chapter 11 cases, along with the last four digits of each Original 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); and Tag Forest, LLC (8974).

The "**Additional Debtors**" in these chapter 11 cases, along with the last four digits of each Additional Debtor's tax identification number, are: 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).

appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Motion and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and any objections (if any) to the Motion having been withdrawn or overruled on the merits; and after due deliberation thereon; and good and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. APC is may file an adversary proceeding challenging the amount, validity, or enforceability of the Secured Obligations (as defined in the Motion) or the perfection or the priority of the IDB Mortgages (as defined in the Motion) up through and including **March 1, 2017 at 4:00 p.m.**
3. The Movants are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.
4. This Court shall retain exclusive jurisdiction over all matters pertaining to this Order and the Motion.

Dated: Wilmington, Delaware
_____, 2017

The Honorable Laurie Selber Silverstein
United States Bankruptcy Judge