

Exhibit A

(Proposed Interim Order)

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

In re:	:	Chapter 11
	:	
NovaSom, Inc.,	:	Case No. 19-11734 (BLS)
	:	
Debtor.	:	
	:	

**INTERIM ORDER AUTHORIZING DEBTOR TO PAY CERTAIN PRE-PETITION
PAYROLL, EMPLOYEE BENEFITS AND EXPENSES PURSUANT TO 11 U.S.C. §§ 105
507 AND 541 AND (II) GRANTING RELATED RELIEF**

Upon consideration of the Motion (the “Motion”) of the Debtor, for entry of interim and final orders (this “Order”) for leave to pay certain pre-petition payroll, benefits, related federal, state and local payroll taxes, and related expenses; and granting related relief, all as more fully set forth in the Motion; and due and sufficient notice of the Motion having been provided under the particular circumstances, and it appearing that no other or further notice need be provided, and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b)(2); and venue being proper before this Court under 28 U.S.C. §§ 1408 and 1409; and a hearing having been held to consider the relief requested in the Motion on an interim basis (the “Hearing”); and upon the Stokes Declaration and the record of the Hearing and all the proceedings before the Court; and the Court having found and determined that the relief requested in the Motion is necessary to avoid immediate and irreparable harm to the Debtor and its estate, as contemplated by Bankruptcy Rule 6003, and such relief is in the best interests of the Debtor, its estate, its creditors, and any parties in interest; and that the legal and factual bases set forth in the Motion and at the hearing

having established just cause for the relief granted herein; and after due deliberation thereon, and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT**:

1. The Motion is granted on an interim basis as set forth herein.
2. The final hearing (the "Final Hearing") on the Motion will be held on _____, 2019, at ____:____.m. (Eastern Standard Time). Any objections or responses to entry of a final order on the Motion must be filed on or before 4:00 p.m. (Eastern Standard Time) on _____, 2019, and served on the following parties:
(a) Debtor, Kurtzman Steady LLC, 401 S. 2nd Street, Suite 200, Philadelphia, PA, 19147, Attn: Jeffrey Kurtzman, E-Mail: kurtzman@kurtzmansteady.com, and Dilworth Paxson LLP, 1500 Market St. 3500E, Philadelphia, Pennsylvania 19102, Attn: Peter Hughes, E-Mail: phughes@dilworthlaw.com; (b) the Office of the United States Trustee for the District of Delaware, (c) East West Bank and the subordinated noteholders (d) the Debtor's twenty (20) largest unsecured creditors, as identified with the Debtor's Chapter 11 Petition (e) David Weitman, K&L Gates LLP, 1717 Main Street, Suite 2800, Dallas, Texas 75201, counsel to the Stalking Horse Purchaser, and (f) any creditors' committee. In the event no objections to entry of a final order on the Motion are timely received, this Court may enter such final order without need for the Final Hearing.

3. The Debtor is authorized, but not directed, to pay the Pre-Petition Obligations,¹ not to exceed \$12,850 per employee, and not to exceed an aggregate amount of \$323,500, which is comprised of the following individual caps: (i) wages, salaries, employee expenses, commissions, and related taxes (\$160,000), and medical contributions (\$163,5000).

¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.

4. The Debtor is granted authority to exclude the employees whose claims are to be paid hereunder from the list of creditors required to be filed pursuant to 11 U.S.C. § 521(a); provided, however, that the Debtor shall have the right to file amended schedules listing such parties as future circumstances may require.

5. The Debtor is authorized to continue to utilize and pay third-party Paycom for payroll servicing.

6. All banks and financial institutions are authorized to honor all payroll, expense, and related checks issued prepetition and on account of the employment obligations identified herein, that are presented for payment to the extent that sufficient funds are on deposit or the Debtor arranges to have sufficient funds deposited in such accounts. All such banks and financial institutions are authorized to rely upon the Debtor's representations, oral or otherwise, that particular payments are authorized by this Order.

7. The Debtor is authorized to reissue checks to cover amounts that are dishonored by any such bank or financial institution.

8. Nothing in the Motion or this Order or the relief granted herein (including any actions taken or payments made by the Debtor) is to be construed as (i) an admission of the validity of any claim against the Debtor; (ii) an admission with respect to the validity, extent, or perfection of any lien; (iii) a waiver of the Debtor's rights or those of any party in interest to dispute, contest, setoff, or recoup any claim, or assert any related rights, claims, or defenses; (iv) a waiver of the Debtor's rights or those of any party in interest over the validity, extent, perfection, or possible avoidance of any lien; and/or (v) an approval or assumption of any agreement, contract, program, policy, or lease under Section 365 of the Bankruptcy Code.

9. The requirements set forth in Bankruptcy Rule 6004(a) are hereby waived.

10. Notwithstanding the applicability of Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.

11. The Debtor is authorized and empowered to take all actions necessary or appropriate to implement the relief granted in this Order.

12. This Court retains jurisdiction over all matters arising from or related to the implementation or interpretation of this Order.

Dated: _____, 2019
Wilmington, Delaware

UNITED STATES BANKRUPTCY JUDGE