

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 THE DEBTOR TO MAINTAIN AND RENEW
PREPETITION INSURANCE POLICIES AND PAY ALL OBLIGATIONS
IN RESPECT THEREOF AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”) of the above-captioned Debtor (the “Debtor”) for entry of interim and final orders (this “Order”) (i) authorizing the Debtor, in its discretion, to (a) maintain, supplement, amend, extend, renew, or replace its Insurance Policies¹ (b) pay any Insurance Obligations, and (ii) granting certain 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

¹ Capitalized terms not defined herein shall have the meanings ascribed in the Motion.

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, in its discretion and business judgment, to maintain, supplement, amend, extend, renew, or replace its Insurance Policies (including any premium financing agreement) as needed in the ordinary course of business, without obtaining an order of the Court.

4. The Debtor is authorized, but not directed, to make any payment under or with respect to the Insurance Obligations to the extent Debtor determines, in its discretion, that such payment is necessary to avoid cancellation, default, alteration, assignment, attachment, lapse, or any form of impairment to the coverage, benefits or proceeds provided under the Insurance Policies.

5. Notwithstanding anything to the contrary in this Order, in the event that a claim is made or has been made under any of the Insurance Policies where the Debtor receives payment with respect to a loss suffered or claim made by the Debtor, any payment or right to payment arising therefrom shall immediately and automatically become part of the Debtor's estate.

6. The Debtor's banks and financial institutions are authorized to receive, process, honor, and pay all checks, drafts, electronic fund transfers, or other forms of payment drawn or issued on the Debtor's bank accounts before the Petition Date for Insurance Obligations that have not been honored and paid as of the Petition Date (or to reissue checks, drafts, electronic fund transfers, or other forms of payment drawn or issued on the Debtor's bank accounts, as may be necessary), and are authorized to rely on the Debtor's representations as to which checks, drafts, transfers, or other forms of payment drawn or issued on the Debtor's bank accounts are subject to this Order; *provided that* sufficient funds are on deposit in the applicable bank accounts to cover such payments.

7. 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.

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

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

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

11. 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