

EXHIBIT A

PROPOSED ORDER

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	
)	Chapter 11
)	
OPEN ROAD FILMS, LLC, a Delaware limited liability company, <i>et al.</i> , ¹)	Case No. 18-12012-LSS
)	
)	Related to Docket No. _____
Debtors.)	

**ORDER GRANTING THE MOTION OF CLUNE CONSTRUCTION COMPANY, LP
FOR RELIEF FROM THE AUTOMATIC STAY**

THIS CAUSE coming on to be heard on the Motion of Clune Construction Company, L.P. for Relief From the Automatic Stay (the "Motion"); and the Court having jurisdiction over the subject matter; and due notice of the Motion having been given; and the Court finding that grounds exist under 11 U.S.C. § 362(d)(1) and (d)(2) for relief from the automatic stay, it is hereby **ORDERED**:

(1) The Motion is GRANTED;

(2) Pursuant to 11 U.S.C. § 362(d), Clune Construction Company, L.P., its principals, agents, successors and/or assigns (collectively, "Clune"), are granted relief from the automatic stay provisions of 11 U.S.C. § 362(a) by terminating said stay to allow Clune to exercise any and all rights and/or remedies it may have under the Owner/Contractor Agreement and/or applicable state law and to proceed to and complete foreclosure on any mechanic's lien it may have against the Leased Premises;

¹ The Debtors and the last four digits of their respective federal taxpayer identification numbers are as follows: Open Road Films, LLC (4435-Del.); Open Road Releasing, LLC (4736-Del.); OR Productions LLC (5873-Del.); Briarcliff LLC (7304-Del.); Open Road International LLC (4109-Del.); and Empire Productions LLC (9375-Del.). The Debtors' address is 2049 Century Park East, 4th Floor, Los Angeles, CA 90067. They will be referred to herein collectively as the "*Debtors*".

(3) Pursuant to 11 U.S.C. § 362(d), Clune is granted relief from the automatic stay provisions of 11 U.S.C. § 362(a) to exercise any and all rights or remedies it may have under the Owner/Contractor Agreement or any other agreement or under applicable state law that it may have against Tang Media Partners, LLC, Global Road Entertainment LLC, and/or or any other non-debtor party; and

(4) The 14-day stay imposed by Federal Rule of Bankruptcy Procedure 4001(a)(3) is waived.

Dated: _____, 2018

LAURIE SELBER SILVERSTEIN,
UNITED STATES BANKRUPTCY JUDGE