

EXHIBIT A

Proposed Order

**IN THE 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)
)	(Jointly Administered)
Debtors.)	
)	
)	Re: Docket No. _____

**ORDER AUTHORIZING SHOWTIME NETWORKS INC. TO FILE
UNDER SEAL THE LIMITED OBJECTION AND RESERVATION OF RIGHTS OF
SHOWTIME NETWORKS INC. TO PROPOSED SALE FREE AND CLEAR OF ALL
LIENS, CLAIMS, ENCUMBRANCES AND OTHER INTERESTS**

Upon the motion (the “**Motion to Seal**”)² of Showtime Networks Inc. (“**Showtime**”) for entry of an order (this “**Order**”) authorizing Showtime to file under seal the *Limited Objection and Reservation of Rights of Showtime Networks Inc. to Proposed Sale Free and Clear of All Liens, Claims, Encumbrances and Other Interests* (the “**Limited Objection**”); and this Court having jurisdiction to consider the Motion to Seal pursuant to 28 U.S.C. §§ 157 and 1334; and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Motion to Seal has been provided under the circumstances; and after due deliberation thereon; and there being good and sufficient cause;

IT IS HEREBY ORDERED THAT:

1. The Motion to Seal is GRANTED.

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.

² All capitalized terms used but otherwise not defined herein shall have the meanings defined in the Motion to Seal.

2. Pursuant to sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018 and Local Rule 9018-1(d), Showtime is authorized to file an unredacted copy of the Limited Objection under seal.

3. The unredacted version of the Limited Objection may not be unsealed unless and until permitted by further order of this Court.

4. Showtime is authorized to file on this Court's docket and to serve on all parties a redacted copy of the Objection.

5. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

6. This Court shall retain jurisdiction to hear and decide any dispute related to or arising from this Order.

Dated: _____, 2018
Wilmington, Delaware

The Honorable Laurie Selber Silverstein
United States Bankruptcy Judge