

**EXHIBIT A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

In re

OPEN ROAD FILMS, LLC, a Delaware  
limited liability company, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 18-12012 (LSS)

(Jointly Administered)

Ref. Docket No. \_\_\_\_\_

**ORDER, PURSUANT TO SECTION 1121(d) OF THE BANKRUPTCY CODE,  
EXTENDING THE EXCLUSIVE PERIODS FOR THE FILING OF A  
CHAPTER 11 PLAN AND THE SOLICITATION AND ACCEPTANCE THEREOF**

Upon consideration of the motion (the “Motion”)<sup>2</sup> of the Debtors for entry of an order, pursuant to section 1121(d) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”), extending the Exclusive Periods for the filing of a chapter 11 plan and solicitation of acceptances thereof; and due and proper notice of the Motion having been given; and it appearing that no other or further notice of the Motion is required; and it appearing that the Court has jurisdiction to consider the Motion in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and it appearing that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that venue of this proceeding and the Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found and determined that the relief requested in the Motion is in the best interest of the Debtors, their

<sup>1</sup> 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 1800 Century Park East, Suite 600, Los Angeles, California 90067.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

estates, their creditors, and all parties in interest; and after due deliberation and good and sufficient cause appearing therefor, **IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.
2. The Plan Period for each Debtor is extended through and including April 4, 2019, pursuant to section 1121(d) of the Bankruptcy Code.
3. The Solicitation Period for each Debtor is extended through and including June 5, 2019, pursuant to section 1121(d) of the Bankruptcy Code.
4. Entry of this Order shall be without prejudice to the Debtors' rights to request further extensions of the Exclusive Periods or to seek other appropriate relief.
5. The Court shall retain jurisdiction and power to hear and determine all matters arising from implementation of this Order.

Dated: January \_\_\_\_\_, 2019  
Wilmington, Delaware

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LAURIE SELBER SILVERSTEIN  
UNITED STATES BANKRUPTCY JUDGE