

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MIAMI METALS I, INC., *et al.*,

Debtors.

Chapter 11

Case No. 18-13359 (SHL)

(Jointly Administered)

**ORDER GRANTING THE MOTION OF FUNDACIÓN
RAFAEL DONDÉ, I.A.P. FOR STAY PENDING APPEAL**

Upon the Motion (the “Motion”),¹ of the Foundation for entry of an order granting a stay pending appeal of the Sanctions Order pursuant to Bankruptcy Rule 8007; and the Court having reviewed the Motion; and the Court having found that (i) the Court has jurisdiction over this matter under 28 U.S.C. §§ 157 and 1334, (ii) venue is proper in this district under 28 U.S.C. §§ 1408 and 1409, (iii) this is a core proceeding under 28 U.S.C. § 157(b), (iv) service and notice of the Motion was sufficient and appropriate under the circumstances, and (v) good and sufficient cause having been shown; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED, as set forth below.
2. Enforcement of the Sanctions Order is stayed pending final appellate adjudication of the Foundation’s appeal of such orders.

¹ Any terms used but not defined herein shall have the meaning ascribed to them in the Motion.

3. This Court shall retain jurisdiction over any and all matters arising from the interpretation or implementation of this Order.

Dated: New York, New York
July __, 2019

THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE