

# **EXHIBIT A**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

TRIAD GUARANTY INC.,<sup>1</sup>

Debtor.

Chapter 11

Case No. 13-11452 (MFW)

Re: D.I. 515, 516, 523, 524

**ORDER ESTABLISHING DISCOVERY SCHEDULE WITH RESPECT TO  
CONFIRMATION OF THE AMENDED JOINT PLAN OF REORGANIZATION**

Upon consideration of the Disclosure Statement [D.I. 523] filed by the debtor, Triad Guaranty Inc. (“Debtor”) and Wolfgang Holdings, LLC (“Wolfgang”, and together with the Debtor, the “Plan Proponents”), related to the Amended Joint Plan of Reorganization of Triad Guaranty Inc. and Wolfgang Holdings, LLC Pursuant to Chapter 11 of the United States Bankruptcy Code (as may be amended, the “Plan”) [D.I. 516], and the Court having considered the request of Jennifer Hammer, Director of Insurance of the State of Illinois, in her Role as Statutory and Court-affirmed Rehabilitator for Triad Guaranty Insurance Corporation and Triad Guarantee Assurance Corporation (the “Rehabilitator” and together with the Plan Proponents, the “Parties”) for a discovery schedule in connection with the Plan (“Discovery Schedule”), which shall apply to discovery by and among the Parties only, and good and sufficient cause appearing therefor, and the Court having jurisdiction to consider the Plan and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, and consideration of the Plan and the relief

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<sup>1</sup> The last four digits of the Debtor’s federal tax identification number are 8519. The location of the Debtor’s headquarters and service address is 1900 Crestwood Blvd., Birmingham, AL 35210.  
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requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(L), and venue being proper pursuant to 28 U.S.C. §§ 1408 and 1409; it is hereby ordered that:

1. The Parties may serve written discovery by email to counsel of record.
2. Responses to written discovery shall be served within fourteen days after service of such discovery, unless the Parties agree otherwise. The Plan Proponents shall respond to the outstanding discovery previously served by the Rehabilitator by October 30, 2017. The Plan Proponents shall serve discovery on the Rehabilitator, if any, by December 1, 2017.
3. The Parties shall work to resolve any discovery-related issues promptly.
4. Depositions among the Parties shall proceed by notice. Any party deposition, the location for which cannot be agreed upon, shall take place in Wilmington, Delaware. Any non-party deposition shall take place in accordance with the applicable Federal Rules.
5. Depositions noticed by the Rehabilitator shall be completed by November 10, 2017. Depositions noticed by the Plan Proponents shall be completed by December 21, 2017. If the Plan Proponents cannot conclude their depositions on December 21, 2017, the Parties will schedule and conclude any remaining deposition on December 22, 2017 and will work cooperatively to minimize any inconveniences for those involved.
6. In accordance with paragraph 6 of the Order (A) Approving Amended Disclosure Statement; (B) Fixing the Voting Record Date; (C) Approving Solicitation and Voting Procedures with Respect to Debtor's Amended Plan of Reorganization; (D) Approving Form of Solicitation Package and Notices; and (E) Scheduling Certain Dates

in Connection Therewith (the “Solicitation Order”) [D.I. 524], objections to Plan confirmation solely with respect to the Rehabilitator are due on November 28, 2017.

7. In accordance with paragraph 8 of the Solicitation Order, no later than January 4, 2018, the Debtor shall file its reply to any timely filed objection by the Rehabilitator.

8. Nothing herein shall be deemed to affect discovery involving any party other than the Parties.

9. The Parties may by mutual agreement modify the dates in the Discovery Schedule without further order of the Court.

10. In the event there is conflict between this Scheduling Order and the Solicitation Order, the Solicitation Order will control.

11. This Court retains jurisdiction to interpret, implement, and enforce this Order.

Dated: October \_\_\_\_, 2017

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The Honorable Mary F. Walrath  
United States Bankruptcy Judge