

Exhibit A

[Proposed Order]

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	Chapter 11
	:	
Wordsworth Academy, <i>et al.</i> , ¹	:	Case No. 17- 14463 (AMC)
	:	
Debtors.	:	Jointly Administered
	:	

ORDER ENFORCING THE AUTOMATIC STAY

Upon the Debtors' motion (the "Motion")² for entry of an order (this "Order") Enforcing the Automatic Stay and Imposing Sanctions for Violation of the Stay, and any objections thereto,

IT IS HEREBY ORDERED that:

1. The Motion is GRANTED on the terms set forth herein.
2. The Court finds that Vee Galaxy and Khaled A. Baki have violated the automatic stay of 11 U.S.C. § 362 by (1) taking action to collect on a prepetition debt; and (2) exercising control over the property by the Debtors consisting of administrative credentials and passwords.
3. The Court hereby imposes damages against Vee Galaxy and Khaled A. Baki in the amount of \$ _____, plus punitive damages in the amount of \$ _____, for a total of \$ _____ in damages.
4. Vee Galaxy and Khaled A. Baki are hereby ordered to pay such damages to Wordsworth Academy, without offset, on or before July 27, 2017.
5. Vee Galaxy and Khaled A. Baki are hereby ordered to disclose in writing to the Debtors the Passwords and any other information held by Vee Galaxy or Khaled A. Baki

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: Wordsworth Academy (9031); Wordsworth CUA 5, LLC (0983); and Wordsworth CUA 10, LLC (5980). Wordsworth Academy has an address at 3300 Henry Ave., Philadelphia, PA 19129.

² Capitalized terms not defined herein shall have the meaning set forth in the Motion.

which is reasonably necessary or useful to the Operation of the Debtors' computer systems and related systems on or before the close of business on July 18th, 2017.

_____, 2017

Honorable Ashley M. Chan
UNITED STATES BANKRUPTCY JUDGE