

Exhibit A

[Proposed Order]

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

In re: : Chapter 11
: :
Wordsworth Academy, *et al.*,⁴ : Case No. 17- 14463 (AMC)
: :
Debtors. : Jointly Administered
: :

**ORDER APPROVING STIPULATIONS
WITH TORT CLAIMANTS FOR RELIEF FROM STAY**

AND NOW, on this _____ day of October, 2017, upon consideration of Motion of the Debtors to Approve Stipulations With Multiple Tort Claimants Regarding Relief from Stay (the “Motion”), and any responses thereto,

IT IS HEREBY ORDERED:

1. The Motion is GRANTED as to the terms set forth herein;
2. The Stipulations (as defined in the Motion) are approved and shall be binding on the Debtors and other parties thereto.

Dated: October _____, 2017

Honorable Ashely M. Chan
United States Bankruptcy Judge

⁴ 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.