

**Exhibit A**

Proposed Order

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

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

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**ORDER EXTENDING TIME TO FILE  
NOTICES OF REMOVAL OF CERTAIN CIVIL ACTIONS**

Upon the Motion of the above-captioned debtors and debtors in possession (collectively, the “Debtors”),<sup>2</sup> for entry of an order pursuant to 28 U.S.C. § 1452, Section 105(a) of the Bankruptcy Code, and Rules 9006 and 9027 of the Federal Rules of Bankruptcy Procedure extending the Removal Period with respect to any or all of the Civil Actions filed prior to the Petition Date by an additional 125 days, *i.e.*, through and including January 31, 2018 as further described in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the relief requested therein being a core proceeding in accordance with 28 U.S.C. § 157(b)(2)(A) and/or (O); and venue being proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and a hearing, if any; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties in interest, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted

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<sup>1</sup> 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.

<sup>2</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.

herein; and any objections to the requested relief having been withdrawn or overruled on the merits; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED:

1. The Motion is GRANTED to the extent provided herein.
2. The time provided by Bankruptcy Rule 9027 within which the Debtors must file notices of removal of any Civil Actions filed prior to the Petition Date is extended 125 days, through and including January 31, 2018.
3. This Order is without prejudice to the Debtors' right to request a further extension of time to file notices of removal of any or all of the Civil Actions, whether filed before or after the Petition Date.
4. This Order is without prejudice to any position the Debtors may take regarding whether Section 362 of the Bankruptcy Code applies to any Civil Action.
5. The Debtors are authorized and empowered to take any and all actions necessary to implement the relief granted in this Order.
6. Notwithstanding the possible application of Bankruptcy Rule 6004(h), or otherwise, the terms of this Order shall be immediately effective and enforceable upon its entry.
7. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: \_\_\_\_\_, 2017  
Philadelphia, Pennsylvania

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Honorable Ashely M. Chan  
United States Bankruptcy Judge