

EXHIBIT B

[Redline of 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 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”)², and any responses thereto,

[The Court has considered the factors relevant to approval of a compromise and finds that the record with respect to the Motion supports the approval of the Stipulations, and accordingly](#)

IT IS HEREBY ORDERED:

1. The Motion is GRANTED ~~as to~~on 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; and

[3. Paragraph 1 of each Stipulation was intended, and is hereby construed, *inter alia*, to assign and transfer to each Plaintiff all of the Debtors’ rights to enforce the Debtors’ insurance contracts, including “Bad Faith” claims should such claims rise, in the event that such Plaintiff obtains a judgment against any Debtor as a consequence of the stipulated relief from stay. No further document or agreement is necessary to effectuate this assignment and transfer.](#)

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.](#)

4. The Debtors shall provide copies of any applicable insurance policies reasonably requested by the Plaintiffs relating to the Claims, but the Debtors make no representations or warranties as to the availability, terms, or conditions of those policies.

Dated: October _____, 2017

Honorable Ashely M. Chan
United States Bankruptcy Judge

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