

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

AND NOW, on this \_\_\_\_ day of \_\_\_\_\_, 2018, upon consideration of the Second 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<sup>2</sup> are approved and shall be binding on the Debtors and other parties thereto.
3. The Plaintiffs shall not be prohibited under the injunction provisions of the Plan, including but not limited to sections 10.01 (a) and 10.02(c) of the Plan, from pursuing claims against the Reorganized Debtors for the limited purpose of collecting from any available insurance.

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Honorable Ashely M. Chan  
United States Bankruptcy Judge

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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 set forth in the Motion.