

## **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 MODIFYING PLAN INJUNCTION  
AS TO CLAIMS OF TREQUAN RUSSELL**

**AND NOW**, on this \_\_\_\_\_ day of \_\_\_\_\_, 2018, upon consideration of the Motion of Trequan Russell for Relief from Automatic Stay Under Section 362 of the Bankruptcy Code (the “Motion”) and all responses thereto,

**IT IS HEREBY ORDERED and DECREED as follows:**

1. The Motion for Relief from the Automatic Stay is DENIED as moot, but the injunction provisions of the Debtors’ confirmed Joint Plan of Reorganization dated December 13, 2017 (the “Plan”) are modified as to Trequan Russell only as set forth herein.

2. Prior to the Debtors’ bankruptcy filings, Russell filed a civil action complaint against Debtor Wordsworth Academy in the Philadelphia County Court of Common Pleas, captioned as Trequan Russell a/k/a Shayana Russell v. Wordsworth Academy d/b/a Wordsworth, May Term, 2017, No. 03133 (the “State Court Action”). The injunction provisions of the Plan are hereby modified to permit Russell to prosecute the State Court Action through its full resolution, whether by settlement or judgment, including any appeals, provided that (a) any claim against the Debtors or the Debtors’ estates shall be treated as a Class 3 claim in accordance with the Plan; and (b) Russell shall be permitted to pursue available insurance if any, only, and shall

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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.

not be permitted to execute on, or otherwise collect on, any assets of the Debtors or the Debtors' estates.

3. The modification of the injunction provisions of the Plan set forth herein is without prejudice to the rights of any insurer regarding whether Russell filed a proof of claim in the bankruptcy case.

Dated: \_\_\_\_\_, 2018

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Honorable Ashely M. Chan  
United States Bankruptcy Judge