

Exhibit A

[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
	:	

**THIRD ORDER APPROVING STIPULATION
WITH TORT CLAIMANTS FOR RELIEF FROM PLAN INJUNCTION**

AND NOW, on this ____ day of _____, 2018, upon consideration of the Third Motion of the Debtors to Approve Stipulation With Multiple Tort Claimants Regarding Relief from Plan Injunction (the “Motion”), and any responses thereto,

IT IS HEREBY ORDERED:

1. The Motion is GRANTED as to the terms set forth herein;
2. The Stipulation² is approved and shall be binding on the Debtors and other parties thereto.
3. Subject to the terms and conditions of the Stipulation, 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.

Honorable Ashely M. Chan
United States Bankruptcy Judge

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.