

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AgFeed USA, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 13-11761 (BLS)

Jointly Administered

Ref. Docket No.: _____

**ORDER, PURSUANT TO 28 U.S.C. § 1452 AND BANKRUPTCY
RULES 9006 AND 9027, FURTHER EXTENDING THE DEBTORS' TIME
TO FILE NOTICES OF REMOVAL OF CLAIMS AND CAUSES OF ACTION
RELATED TO THE DEBTORS' CHAPTER 11 PROCEEDINGS**

Upon consideration of the Motion² of AgFeed USA and the Debtors for entry of an order, pursuant to 28 U.S.C. § 1452 and Bankruptcy Rules 9006 and 9027, extending the Debtors' time to file notices of removal of the Actions and related proceedings; and upon consideration of the Motion; and due and proper notice of the Motion having been given; and it appearing that no other or further notice of the Motion is required; and it appearing that the Court has jurisdiction to consider the Motion in accordance with 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order; and it appearing that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that venue of this proceeding and the Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that the relief requested in the Motion and provided for herein is in the best interest of the Debtors and their estates and creditors; and after due deliberation and sufficient cause appearing therefor,

¹ The Debtors and the last four digits of their federal tax identification numbers are: AgFeed USA, LLC (8748), AgFeed Industries, Inc. (7168); TS Finishing, LLC (8748); New York Finishing, LLC (8748); Pork Technologies, LC (2076); New Colony Farms, LLC (9246); Heritage Farms, LLC (8141); Heritage Land, LLC (8129); Genetics Operating, LLC (1921); M2P2 Facilities, LLC (8748); MGM, LLC (8748); M2P2 General Operations, LLC (8748); New Colony Land Company, LLC(5834); M2P2 AF JV, LLC (8748); Midwest Finishing, LLC (8748); and Genetic Land, LLC (1921). The Debtors' mailing address is 816 Congress Avenue, Suite 1280, Austin, TX 78701.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The time period provided by Bankruptcy Rule 9027 within which the Debtors may file notices of removal of related proceedings under Bankruptcy Rule 9027(a)(2) and (a)(3) is enlarged and extended through and including July 9, 2014, provided, however, that any request by the Debtors to have the claim(s) filed by James Regnante in these Chapter 11 Cases adjudicated in any forum other than this Court shall be done so only upon order of this Court after notice to Mr. Regnante.
3. The July 9, 2014 deadline to file removal actions applies to all matters specified in Bankruptcy Rule 9027(a)(2) and (a)(3).
4. This Order shall be without prejudice to the Debtors' right to seek further extensions of the time within which to remove related proceedings.

Dated: April ____, 2014
Wilmington, Delaware

BRENDAN L. SHANNON
UNITED STATES BANKRUPTCY JUDGE