

Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

AIRFASTTICKETS, INC.,

Debtor.

Chapter 11

Case No. 15-11951 (SHL)

ORDER GRANTING MOTION FOR 2004 EXAMINATION

Upon the motion (the “Motion”) of Fareportal Inc. (“Fareportal”) for authorization to (a) conduct an examination of Travana, Inc. (“Travana”) pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and (b) seek related document production; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and sufficient notice of the Motion having been given; and it appearing that no other or further notice need be provided; and no objections to the Motion having been heard; and it appearing that the relief requested in the Motion is proper pursuant to Bankruptcy Rule 2004; after due deliberation and sufficient cause appearing therefore,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. Fareportal shall be permitted to conduct an examination of Travana pursuant to Bankruptcy Rule 2004 in connection with the Trade Secrets (as such term is defined in the Motion).
3. Travana shall produce for inspection and copying the documents identified in Exhibit D to the Motion, and any other documents requested by Fareportal that are within the

scope of the Motion, no later than fourteen (14) days after entry of this Order at the offices of counsel to Fareportal, Sheppard Mullin, Richter & Hampton, LLP (Attn: Malani J. Cademartori, Esq.), 30 Rockefeller Plaza, New York , New York, 10112.

4. This Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York
_____, 2019

THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE