

**Fox Ortega Enterprises, Inc. dba Premier Cru, Debtor
Case No. 16-40050-WJL-7**

EXHIBIT A

TO

**MOTION FOR ORDER AUTHORIZING SALE
OF WINE PURSUANT TO BANKRUPTCY CODE
SECTION 363 AND TO DETERMINE TITLE TO
SEGREGATED WINE**

STIPULATION FOR RESOLUTION OF TITLE AS TO SEGREGATED WINES

This Stipulation for Resolution of Title as to Segregated Wines is entered on March 14, 2016, and is between Michael Kasolas, the Chapter 7 Trustee in bankruptcy ("Trustee") in the bankruptcy estate of Fox Ortega Enterprises, Inc. dba Premier Cru, Case No. 16-40050 ("Debtor"), pending in the United States Bankruptcy Court for the Northern District of California, Oakland Division ("Estate") and William A. Witte ("Creditor"), a creditor in this Estate. The Trustee and Creditor are collectively referred to as the "Parties".

Facts:

1. The Debtor filed a Chapter 7 of Title 11 of the United States Code on January 8, 2016.
2. At the time this case was commenced, certain bottles of wine had been physically segregated from the general inventory. The Creditor in this Stipulation has been identified as someone who has wine with his or her name attached that has been physically segregated.
3. If in addition to the segregated wine bottles the Creditor claims an ownership interest in other wine, the Trustee will advise the Creditor if said wine is in the Debtor's warehouse, and the Creditor will be given an option to enter into a stipulation to resolve that dispute at the same time under a similar time frame as the dispute involving the segregated wine bottles.
4. The purpose of this Stipulation is to find a way in which both the Trustee and Creditor can obtain an expedited decision by the Bankruptcy Court on the issue of who has title to the wine that is segregated.
5. The Parties agree that it is in their interest to resolve this matter as soon as possible, and the traditional method of resolving a title dispute can be very lengthy. Therefore, in the interest of resolving this as soon as possible, the Parties agree to enter into this Stipulation.

Stipulation

- A. Within 4 business days after the Parties have executed this Stipulation, the Trustee will provide Creditor with a list of the wine under its name that has been segregated, along with a description as to how it has been segregated.
- B. The Parties agree that the Honorable William Lafferty, United States Bankruptcy Judge, shall have jurisdiction to enter a final order determining title in this matter, upon the filing of a motion by the Trustee ("Title Determination Motion"). Said Title Determination Motion will be deemed a contested matter, and all bankruptcy rules that apply to contested matters will apply in this instance, except for those items which have specifically been agreed to herein. The parties waive their right to have the matter determined by adversary proceeding.

C. The Parties agree that the Trustee will file a motion to determine title as to all Creditors who have segregated wine in their names and execute this Stipulation on or before 2 weeks after executing this Stipulation. The Creditors will have three weeks to file a response. The Trustee will thereafter have 1 week to file a reply brief. Thereafter, the matter will be submitted to the Court for determination if there are no factual disputes. The court may set a status conference in the matter at any time.

D. If there are factual issues to be resolved the Parties will coordinate with the Court to set an evidentiary hearing on an expedited basis.

E. Notwithstanding this Stipulation, the Parties are free to try to settle this dispute if they choose to.

Michael Kasolas, Trustee



Creditor signature

WILLIAM A. WITTE

(print name)