

## **EXHIBIT A**

### **Proposed Order**

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

	)	
In re:	)	Chapter 11
	)	
KIKO USA, Inc., <sup>1</sup>	)	Case No. 18-10069 (MFW)
	)	
Debtor.	)	
	)	Re: Docket Nos. 243, 247, 248 and _____
	)	

**ORDER AUTHORIZING, BUT NOT DIRECTING,  
THE DEBTOR TO PAY SEVERANCE OBLIGATIONS  
ABOVE THE STATUTORY LIMIT SET FORTH IN 11 U.S.C. § 507(a)(4)**

Upon the motion (the “**Motion**”) of KIKO USA, Inc. (“**KIKO**” or the “**Debtor**”), as debtor and debtor in possession in the above-captioned case, for entry of an order authorizing, but not directing, the Debtor, in accordance with its past and current employment policies and practices, to honor certain severance program obligations in the ordinary course of business that are in excess of the statutory limit set forth in section 507(a)(4) of the Bankruptcy Code; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court being able to issue a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; 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; after due deliberation thereon; and this Court having found that good and sufficient cause exists for the relief granted by this Order, it is hereby

<sup>1</sup> The last four digits of the Debtor’s federal tax identification number are 0805. The principal place of business for the Debtor is 470 Park Avenue South, 15th Floor New York, NY, 10016.

**ORDERED, ADJUDGED, AND DECREED THAT:**

1. The Motion is GRANTED.
2. The Debtor is authorized, but not directed, to pay the Excess Severance Obligations (as that term is defined in the Motion) as they become due.
3. Notwithstanding the relief granted herein or any action taken hereunder, nothing contained in this Order shall create any rights in favor of, or enhance the status of any claim held by, any Employee, or any other person or entity.
4. The notice of the relief requested in the Motion satisfies Bankruptcy Rule 6004(a) and, pursuant to Bankruptcy Rule 6004(h), the terms and provisions of this Order shall be immediately effective and enforceable upon its entry.
5. The Debtor is authorized to take all steps necessary or appropriate to carry out the terms of this Order.
6. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.

Dated: \_\_\_\_\_, 2018  
Wilmington, Delaware

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HONORABLE MARY F. WALRATH  
UNITED STATES BANKRUPTCY JUDGE