EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11 (Subchapter V)

SHARITY MINISTRIES, INC.,¹

Debtor.

Case No.: 21-11001 (JTD)

Ref. No. ____

ORDER (I) EXTENDING THE GENERAL BAR DATE FOR FILING PROOFS OF CLAIM, AND (II) APPROVING THE MANNER OF NOTICE THEREOF

Upon the motion (the "<u>Motion</u>")² of the Debtor for entry of an order (the "<u>Order</u>") (the "<u>Order</u>"), (i) extending the General Bar Date to January 4, 2022, and (ii) approving the form and manner of notice thereof; 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 having found that venue of this case and this proceeding is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtor's estate, its creditors, and other parties in interest; and this Court having found that the Debtor's notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "<u>Hearing</u>"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of

¹ The last four digits of the Debtor's federal tax identification number is 0344. The Debtor's mailing address is 821 Atlanta Street, Suite 124, Roswell, GA 30075.

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

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the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

1. The Motion is **GRANTED** as set forth herein.

2. The General Bar Date is extended to January 4, 2022.

3. The Debtor is authorized to provide notice of the extended General Bar Date to all members consistent with the provisions of the Notice Order.

4. The Debtor is authorized and empowered to take all actions necessary to implement the relief granted in this Order in accordance with the Motion.

5. Nothing contained in the Motion or this Order is intended or should be construed as a waiver of the Debtor's or any parties in interests' right to dispute, object to, challenge or assert offsets or defenses against any claim on any grounds; nor shall anything in this Order preclude any post-confirmation trust or trustee from extending the right of certain or all holders of claims or interests to submit proofs of claims after the effective date of any order approving a Chapter 11 plan of reorganization or liquidation.

6. The terms and conditions of this Order shall be immediately effective and enforceable upon entry of this order.

7. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2021 Wilmington, Delaware

> THE HONORABLE JOHN T. DORSEY UNITED STATES BANKRUPTCY JUDGE