Exhibit A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
SGR WINDDOWN, INC., et al.,[1]	Case No. 19-11973 (MFW)
Debtors.	(Jointly Administered)
	Re D.I. _____

ORDER EXTENDING THE PERIOD TO REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452 AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 9027

Upon the motion (the "Motion")[2] of the above-captioned Debtors and Debtors-in-Possession (collectively, the "Debtors") for entry of an order (this "Order") extending the period within which the Debtors may remove actions pursuant to 28 U.S.C. § 1452 and Rule 9027 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), as more fully set forth in the Motion; and it appearing that this Court has jurisdiction to consider the Motion 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 it may enter a final order consistent with Article III of the United States Constitution; and the 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 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 hearing to consider the relief requested herein (the "Hearing") having been

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number or Canadian Revenue Agency, as applicable are (1) SGR Winddown, Inc., a Delaware corporation (4356), (2) SGR Winddown International, LLC, a Delaware limited liability company (1254), and (3) SGR Canada Winddown Legacy, Ltd. (4480). The location of the Debtors' corporate headquarters is 1700 E. Walnut Ave, 5th Floor, El Segundo, California 90245

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

provided to the parties provided for in the Motion and no further notice being necessary; and the legal and factual bases set forth in the Motion establishing just and sufficient cause to grant the relief requested therein; and the relief granted herein being in the best interests of the Debtors, their estates, creditors, and all parties in interest; and upon all of the proceedings before the Court; and upon due deliberation given, IT IS HEREBY ORDERED THAT:

1. 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) is enlarged and extended through and including May 4, 2020 (the "Pre-Petition Removal Deadline").

2. The Pre-Petition Removal Deadline applies to all matters specified in Bankruptcy Rule 9027(a)(2)(A), (B), (C).

3. 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)(3) is enlarged and extended to the later of (i) May 4, 2020, and (ii) the time period specified in Bankruptcy Rule 9027(a)(3)(A) and (B) (i.e. the shorter of (A) 30 days after receipt, through service or otherwise, of a copy of the initial pleading setting forth the claim or cause of action sought to be removed, or (B) 30 days after receipt of the summons if the initial pleading has been filed with the court but not served with the summons) (the "Post-Petition Removal Deadline").

4. The Post-Petition Removal Deadline applies to all matters specified in Bankruptcy Rule 9027(a)(3).

5. This Order is without prejudice to the Debtors' rights to seek further extensions of the time within which to remove related proceedings.

6. This Court shall retain jurisdiction over all matters arising from or related to the implementation, interpretation, or enforcement of this Order.