

**Exhibit A**

**Proposed Order**

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

In re:

SPORTCO HOLDINGS, INC., et al.,<sup>1</sup>

Debtors.

Chapter 11

Case No. 19-11299 (LSS)  
(Jointly Administered)

Ref. Docket Nos. 365, 374, 399 & 421 \_\_\_\_\_

**PROPOSED ORDER (I) OVERRULING THE COMMITTEE’S OMNIBUS OBJECTION  
TO THE WELLSPRING CLAIMS AND (II) TEMPORARILY ALLOWING THE  
WELLSPRING CLAIMS FOR VOTING PURPOSES**

Upon consideration of *The Wellspring Creditors’ (I) Response to Committee’s Omnibus Substantive Objection to Classification of Wellspring Claims* (the “Response”) and *(II) Rule 3018 Motion for Temporary Allowance of the Wellspring Claims for Voting Purposes* (the “Rule 3018 Motion,” and together with the Response, the “Response and Motion”);<sup>2</sup> and this Court having jurisdiction to consider the Response and Motion and the relief requested therein under 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* dated February 29, 2012; and the relief requested therein 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 it appearing that this Court may enter a final order consistent with Article III of the United States Constitution; and due and proper notice of the Response and Motion having been provided; and it appearing that no other or further notice need be provided; and a hearing having been held to consider the relief requested in

<sup>1</sup> The Debtors, together with the last four digits of each Debtor’s federal tax identification number, are: Bonitz Brothers, Inc. (4441); Ellett Brothers, LLC (7069); Evans Sports, Inc. (2654); Jerry’s Sports, Inc. (4289); Outdoor Sports Headquarters, Inc. (4548); Quality Boxes, Inc. (0287); Simmons Guns Specialties, Inc. (4364); SportCo Holdings, Inc. (0355); and United Sporting Companies, Inc. (5758). The location of the Debtors’ corporate headquarters and the service address for all Debtors is 267 Columbia Ave., Chapin, SC 29036.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Response and Motion.

the Response and Motion; and this Court having found and determined that the relief sought therein is in the best interests of all parties and that the legal and factual bases set forth in the Response and Motion establish just cause for the relief granted herein; and all objections and responses to the Response and Motion having been duly considered and overruled or withdrawn; and no other objections or responses to the Response and Motion having been filed; and after due deliberation and sufficient cause appearing therefore, it is hereby **ORDERED** that:

1. The Rule 3018 Motion is **GRANTED** as set forth herein.
2. The Claim Objection is **OVERRULED** in its entirety.
3. In accordance with the Solicitation Order and pursuant to Bankruptcy Rule 3018 and Sections 105 and 502 of the Bankruptcy Code, each Wellspring Claim is temporarily allowed as a Class 4 General Unsecured Claim for voting purposes only in the amount and against the Debtor set forth in Schedule 1 to this Order.
4. In light of Local Rule 3007-1(f)(iii), any future objections to the Wellspring Claims shall only be on a non-substantive basis in accordance with Local Rule 3007-1(d).
5. This Court shall retain jurisdiction to hear and determine all matters and disputes arising out of or relating to the implementation or interpretation of this Order.

**Schedule 1**

## Full List of Wellspring Claims Allowed for Voting Purposes Only

<b>Wellspring Creditor</b>	<b>Claim #</b>	<b>Debtor Entity Against Which Proof of Claim is Temporarily Allowed for Voting Purposes Only</b>	<b>Dollar Amount in Which Proof of Claim is Temporarily Allowed for Voting</b>
Wellspring Capital Management LLC	92	SportCo Holdings, Inc.	\$3,486,259.00
Wellspring Capital Management LLC	94	Simmons Gun Specialties, Inc.	\$3,486,259.00
Wellspring Capital Management LLC	97	Quality Boxes, Inc.	\$3,486,259.00
Wellspring Capital Management LLC	98	Outdoor Sports Headquarters, Inc.	\$3,486,259.00
Wellspring Capital Management LLC	99	Jerry's Sports, Inc.	\$3,486,259.00
Wellspring Capital Management LLC	100	Evans Sports, Inc.	\$3,486,259.00
Wellspring Capital Management LLC	101	Outdoor Sports Headquarters, Inc.	\$3,486,259.00
Wellspring Capital Management LLC	101	Bonitz Brothers, Inc.	\$3,486,259.00
Wellspring Capital Management LLC	102	United Sporting Companies, Inc.	\$3,486,259.00
Wellspring Capital Management LLC	103	Ellett Brothers, LLC	\$3,486,259.00
WCM GenPar IV GP, LLC	104	SportCo Holdings, Inc.	\$1.00
WCM GenPar IV GP, LLC	105	United Sporting Companies, Inc.	\$1.00
WCM GenPar IV GP, LLC	106	Ellett Brothers, LLC	\$1.00
WCM GenPar IV GP, LLC	107	Evans Sports, Inc.	\$1.00

WCM GenPar IV GP, LLC	108	Outdoor Sports Headquarters, Inc.	\$1.00
WCM GenPar IV GP, LLC	109	Simmons Gun Specialties, Inc.	\$1.00
WCM GenPar IV GP, LLC	110	Jerry's Sports, Inc.	\$1.00
WCM GenPar IV GP, LLC	111	Quality Boxes, Inc.	\$1.00
WCM GenPar IV GP, LLC	112	Bonitz Brothers, Inc.	\$1.00
WCM GenPar IV GP, LLC	113	SportCo Holdings, Inc.	\$1.00
WCM GenPar IV GP, LLC	114	United Sporting Companies, Inc.	\$1.00
WCM GenPar IV GP, LLC	115	Ellett Brothers, LLC	\$1.00
WCM GenPar IV GP, LLC	116	Evans Sports, Inc.	\$1.00
WCM GenPar IV GP, LLC	117	Outdoor Sports Headquarters, Inc.	\$1.00
Wellspring Capital Management LLC	118	SportCo Holdings, Inc.	\$1.00
WCM GenPar IV GP, LLC	119	Simmons Gun Specialties, Inc.	\$1.00
Wellspring Capital Management LLC	120	United Sporting Companies, Inc.	\$1.00
Wellspring Capital Management LLC	121	Ellett Brothers, LLC	\$1.00
Wellspring Capital Management LLC	122	Evans Sports, Inc.	\$1.00
Wellspring Capital Management LLC	123	Outdoor Sports Headquarters, Inc.	\$1.00
Wellspring Capital Management LLC	125	Simmons Gun Specialties, Inc.	\$1.00

Wellspring Capital Management LLC	126	Jerry's Sports, Inc.	\$1.00
Wellspring Capital Management LLC	127	Quality Boxes, Inc.	\$1.00
Wellspring Capital Management LLC	128	Bonitz Brothers, Inc.	\$1.00
Wellspring Capital Management LLC	129	SportCo Holdings, Inc.	\$1.00
Wellspring Capital Management LLC	130	United Sporting Companies, Inc.	\$1.00
Wellspring Capital Management LLC	131	Ellett Brothers, LLC	\$1.00
Wellspring Capital Management LLC	132	Evans Sports, Inc.	\$1.00
Wellspring Capital Management LLC	133	Outdoor Sports Headquarters, Inc.	\$1.00
Wellspring Capital Management LLC	134	Simmons Gun Specialties, Inc.	\$1.00
Wellspring Capital Management LLC	135	Jerry's Sports, Inc.	\$1.00
Wellspring Capital Management LLC	136	Quality Boxes, Inc.	\$1.00
Wellspring Capital Management LLC	137	Bonitz Brothers, Inc.	\$1.00
Wellspring Capital Management LLC	139	SportCo Holdings, Inc.	\$1.00
Wellspring Capital Management LLC	140	United Sporting Companies, Inc.	\$1.00
Wellspring Capital Management LLC	141	Ellett Brothers, LLC	\$1.00
Wellspring Capital Management LLC	142	Evans Sports, Inc.	\$1.00
Wellspring Capital Management LLC	143	Outdoor Sports Headquarters, Inc.	\$1.00

Wellspring Capital Management LLC	144	Simmons Gun Specialties, Inc.	\$1.00
Wellspring Capital Management LLC	145	Jerry's Sports, Inc.	\$1.00
Wellspring Capital Management LLC	146	Quality Boxes, Inc.	\$1.00
Wellspring Capital Management LLC	147	Bonitz Brothers, Inc.	\$1.00
Wellspring Capital Partners IV, L.P.	148	SportCo Holdings, Inc.	\$1.00
WCM GenPar IV GP, LLC	149	Quality Boxes, Inc.	\$1.00
Wellspring Capital Partners IV, L.P.	150	United Sporting Companies, Inc.	\$1.00
Wellspring Capital Partners IV, L.P.	151	Ellett Brothers, LLC	\$1.00
Wellspring Capital Partners IV, L.P.	152	Evans Sports, Inc.	\$1.00
Wellspring Capital Partners IV, L.P.	153	Outdoor Sports Headquarters, Inc.	\$1.00
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