

EXHIBIT A

Proposed Order

Robert S. Westermann (VSB No. 43294) Sheila deLa Cruz (VSB No. 65395) HIRSCHLER FLEISCHER, P.C. The Edgeworth Building 2100 East Cary Street Post Office Box 500 Richmond, Virginia 23218-0500 Telephone: (804) 771-9500 Facsimile: (804) 644-0957 E-mail: rwestermann@hf-law.com sdelacruz@hf-law.com	Thomas R. Califano (NY Bar No. 2286144)* George B. South, III (NY Bar No. 2446771)* Sarah E. Castle (NY Bar No. 4932240)* DLA PIPER LLP (US) 1251 Avenue of the Americas New York, New York 10020-1104 Telephone: (212) 335-4500 Facsimile: (212) 335-4501 E-mail: Thomas.Califano@dlapiper.com George.South@dlapiper.com Sarah.Castle@dlapiper.com * Admitted <i>pro hac vice</i>
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Counsel for Virginia United Methodist Homes of Williamsburg, Inc., Debtor and Debtor In Possession

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:)	
)	
VIRGINIA UNITED METHODIST HOMES)	Case No. 13-31098
OF WILLIAMSBURG, INC.,)	
)	Chapter 11
Debtor,)	
)	

**ORDER SUSTAINING DEBTOR'S FIRST OMNIBUS OBJECTION TO
CLAIMS (DISALLOWANCE OF CERTAIN (I) DUPLICATE CLAIMS;
AND (II) AMENDED CLAIMS)**

This matter came before the Court upon the *Debtor's First Omnibus Objection to Claims (Disallowance of Certain (I) Duplicate Claims; and (II) Amended Claims)* (the "Objection"),² which requested, among other things, that the "Claim No. To Be Disallowed" specifically identified in Exhibit C and Exhibit D attached to the Objection be disallowed in their entirety and for all purposes in this bankruptcy case for those reasons set forth in the Objection; and it appearing to the Court that the relief requested in the Objection is in the best interests of the bankruptcy estate, creditors, and other parties in interest; it further appearing to the Court that (i) proper notice of the Objection has been provided to all necessary parties, and no further notice

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

being necessary, (ii) the Court's consideration of the Objection is proper and the relief requested therein is a core proceeding pursuant to 28 U.S.C. §§ 157 and 1334, (iii) venue is proper under 28 U.S.C. §§ 1408 and 1409, and (iv) no responses or objections to the Objection have been filed, or if filed have been resolved or overruled; and after due deliberation and sufficient cause appearing therefore, it is hereby

ORDERED, ADJUDGED, AND DECREED that:

1. The Objection is sustained in its entirety.
2. The Claims as identified in the column "Claim No. To Be Disallowed" in **Exhibit 1** and **Exhibit 2** attached to this Order and incorporated herein, are forever disallowed in their entirety for all purposes in this bankruptcy case.
3. The Debtor's rights to object to any claim, including, without limitation, the Claims and Surviving Claims subject to this Objection, on any grounds that applicable law permits, are not waived and are expressly reserved.
4. The Order is effective without further action by the Debtor or the Claimants.
5. The Debtor is authorized to take all action necessary to effectuate the relief granted pursuant to this Order and in accordance with the Objection.
6. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry and any applicable stay is waived.
7. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: _____
Richmond, Virginia

United States Bankruptcy Judge

Entered on Docket: _____

We ask for this:

/s/ Sheila deLa Cruz

Robert S. Westermann (VSB No. 43294)

Sheila deLa Cruz (VSB No. 65395)

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*Counsel for Virginia United Methodist Homes of Williamsburg, Inc.,
Debtor and Debtor In Possession*

CERTIFICATE OF ENDORSEMENT

I hereby certify, under Local Rule 9022-1, that the foregoing proposed Order has been endorsed by and/or served upon all necessary parties.

/s/ Sheila deLa Cruz

Counsel

EXHIBIT 1 To Proposed Order

\$26,472.88

EXHIBIT 2 To Proposed Order

\$19,528.27