

EXHIBIT A

PROPOSED ORDER

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

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In re: :
: Case No. 06-61796
CEP HOLDINGS, LLC, et al.,¹ : (Jointly Administered)
: :
Debtors. : Chapter 11
: :
: Honorable Russ Kendig
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**ORDER WAIVING COMPLIANCE WITH LOCAL
BANKRUPTCY RULES 9013-1(a), 9013-2(a) AND 9013-2(d)**

Upon the motion (the “**Motion**”)² of CEP Holdings, LLC and its affiliated debtors and debtors in possession (each a “**Debtor**” and collectively, the “**Debtors**” or “**CEP**”) in the above-captioned Chapter 11 cases (the “**Cases**”), for entry of an order waiving the Debtors’ compliance with Local Bankruptcy Rules 9013-1(a), 9013-2(a) and 9013-2(d), thereby authorizing the Debtors to refrain from (i) providing a memorandum in support of each of their First Day Motions and Future Motions, (ii) seeking and obtaining leave of the Court before filing certain First Day Motions and Future Motions that exceed the 20 page limit and (iii) attaching Unreported Orders to their First Day Motions and Future Motions, the Court having reviewed the Motion and having heard the statements of counsel in support of the relief requested therein at a hearing before the Court (the “**Hearing**”); and upon the Mallak Affidavit; and the Court having found and concluded that (i) it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (ii) this is a core proceeding, (iii) notice of the Motion was sufficient under the circumstances, and (iv) the legal and factual bases set forth in the Motion, the Mallak Affidavit,

¹ The Debtors include: CEP Holdings, LLC, Creative Engineered Polymer Products, LLC and Thermoplastics Acquisition, LLC.

² Capitalized terms not otherwise defined herein shall have the meanings given to them in the Motion.

and at the Hearing establish just cause for the relief granted herein; and this Court having determined that granting the relief requested in the Motion is in the best interests of the Debtors, their estates and their creditors; and after due deliberation and sufficient cause appearing therefore;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED to the extent provided herein.
2. The Debtors shall not be required to attach legal memoranda in support of the First Day Motions and/or Future Motions as required by Local Bankruptcy Rule 9013-1(a). Notwithstanding the foregoing, the Debtors specifically reserve the right to submit legal memoranda in support of any First Day Motions or Future Motions (a) to the extent the Debtors deem such legal memoranda to be useful or necessary or (b) upon the request of the Court.
3. The Debtors shall be permitted to file First Day Motions exceeding the 20 page limit imposed by Local Bankruptcy Rule 9013-2(a) and Future Motions exceeding the 20 page limit when appropriate without first seeking or obtaining leave of the Court.
4. The Debtors shall be permitted to cite Unreported Orders in the First Day Motions and/or Future Motions without attaching the Unreported Orders thereto. In lieu of complying with Local Bankruptcy Rule 9013-2(d), the Debtors shall make any Unreported Orders cited available to this Court and parties in interest upon request to the Debtors' counsel. Notwithstanding the foregoing, the Debtors specifically reserve the right to attached copies of any Unreported Orders to any Future Motions or legal memoranda in support thereof (a) to the extent the Debtors deem the inclusion of such Unreported Orders to be useful or necessary or (b) upon the request of the Court.
5. This Court shall retain jurisdiction to hear and determine all matters arising from or relating to the implementation of this Order.

6. The requirement pursuant to Local Bankruptcy Rule 9013-1(a) that the Debtors file a memorandum of law in support of the Motion is hereby waived.

7. Notwithstanding the possible applicability of Bankruptcy Rules 6004(h), 7062, 9014 or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

Dated: September ____, 2006
Canton, OH

UNITED STATES BANKRUPTCY JUDGE