

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF CONNECTICUT
BRIDGEPORT DIVISION**

In re:

HO WAN KWOK, *et al.*,Debtors¹

LUC A. DESPINS, CHAPTER 11 TRUSTEE FOR
THE ESTATE OF HO WAN KWOK,

Plaintiff,

V.

HCHK TECHNOLOGIES, INC., HCHK
PROPERTY MANAGEMENT, INC.,
LEXINGTON PROPERTY AND STAFFING,
INC., HOLY CITY HONG KONG VENTURES,
LTD., ANTHONY DIBATTISTA, YVETTE
WANG, and BRIAN W. HOFMEISTER,
ASSIGNEE FOR THE BENEFIT OF THE
CREDITORS

Defendants.

**[PROPOSED] ORDER GRANTING PROPOSED INTERVENORS
SHIH HSIN YU, 1332156 B.C. LTD AND GWGPNZ LIMITED'S MOTION
TO FILE COMPLETE, UNREDACTED VERSION OF CERTAIN EXHIBITS
TO PROPOSED INTERVENORS' REPLY IN FURTHER SUPPORT OF
MOTION TO INTERVENE IN ADVERSARY PROCEEDING UNDER SEAL**

¹ The Debtors in these chapter 11 cases are Ho Wan Kwok (also known as Guo Wengui, Miles Guo, and Miles Kwok) (last four digits of tax identification number: 9595), Genever Holdings LLC (last four digits of tax identification number: 8202), and Genever Holdings Corporation. The mailing address for the Trustee, Genever Holdings LLC, the Genever Holdings Corporation, is Paul Hastings LLP, 200 Park Avenue, New York, NY 10166 c/o Luc A. Despins, as Trustee for the Estate of Ho Wan Kwok (solely for the purposes of notices and communications).

Upon consideration of the motion (the “Motion”)² of Proposed Intervenor Shin Hsin Yu (“Mr. Shih”), 1332156 B.C. LTD (“1332156 B.C.”) and GWGOPNZ Limited (“GWGOPNZ”) (collectively, the “Proposed Intervenor”) requesting approval of the sealed filing of certain exhibits cited and/or described within the Reply and attached to the Pastore Declaration, and good cause having been shown; the Court having found that the filing of certain exhibits cited and/or described within the Reply and attached to the Pastore Declaration is consistent with the relevant parties’ agreements and expectations under the Protective Order, the relief provided in that Order being narrowly tailored to serve the foregoing purposes, and good cause having thereby and otherwise been shown, it is, HEREBY

1. ORDERED, that the Motion is granted as set forth herein; and it is further

2. ORDERED, that the Proposed Intervenor is authorized to file certain exhibits cited and/or described within the Reply and attached to the Pastore Declaration, and those exhibits shall remain under seal and shall not be made publicly available, unless and until permitted by further order of this Court; and it is further

3. ORDERED, that the Proposed Intervenor is further authorized to file on this Court’s docket and to serve on other parties-in-interest redacted copies of certain exhibits cited and/or described within and attached to the Luft Declaration that are Designated Material pursuant to the Protective Order; and it is further

4. ORDERED, that, pursuant to 11 U.S.C. § 107(c)(3), the United States Trustee has a statutory right of full access to any information and/or document filed on the docket or submitted to the Court in this case; the United States Trustee shall comply with the obligations of 11 U.S.C. § 107(c)(3)(B); and it is further

² Capitalized terms used but not defined in this Order have the meanings set forth in the Motion.

5. ORDERED, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry; and it is further

6. ORDERED, that the Proposed Intervenor are authorized to take all actions necessary to effectuate the relief granted herein; and it is further

7. ORDERED, that the Court shall retain jurisdiction with respect to all matters arising from or related to the interpretation or implementation of this Order.

Dated: Bridgeport, Connecticut
_____, 2023

THE HONORABLE JULIE A. MANNING
UNITED STATES BANKRUPTCY JUDGE