

Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

In re:

deeproot Capital Management, LLC, *et al.*,¹²

Debtors.

Chapter 7

Case No. 21-51523 (MMP)

(Jointly Administered)

**ORDER GRANTING EXPEDITED MOTION TO QUASH BANKRUPTCY
RULE 2004 EXAMINATION NOTICES WITH SUBPOENA DUCES TECUM**

Upon the *Expedited Motion to Quash Bankruptcy Rule 2004 Examination Notices with Subpoena Duces Tecum* (the “**Motion**”)¹³ filed by Cycladic International, LLC, (“**Cycladic International**”), Cycladic, LLC (“**Cycladic**”), and Thomas N. Andrew (“**Andrew**” and together with Cycladic International and Cycladic, the “**Subpoena Respondents**”) seeking entry of an

¹² The administratively consolidated chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor’s federal tax identification number, are: *In re Policy Services, Inc.*, 21-51513 (2864), *In re Wizard Mode Media, LLC*, 21-51514 (3205), *In re deeproot Pinball LLC*, 21-51515 (0320), *In re deeproot Growth Runs Deep Fund, LLC*, 21-51516 (8046), *In re deeproot 575 Fund, LLC*, 21-51517 (9404), *In re deeproot 3 Year Bonus Income Debenture Fund, LLC*, 21-51518 (7731), *In re deeproot Bonus Growth 5 Year Debenture Fund, LLC*, 21-51519 (9661), *In re deeproot Tech LLC*, 21-51520 (9043), *In re deeproot Funds LLC*, 21-51521 (9404), *In re deeproot Studios LLC*, 21-51522 (6283), and *In re deeproot Capital Management, LLC*, 21-51523 (2638).

¹³ Capitalized terms used but not defined herein are intended to have the meanings ascribed to them in the Motion.

order granting expedited consideration and other relief concerning Movants' *Expedited Motion to Quash Bankruptcy Rule 2004 Examination Notices with Subpoena Duces Tecum* (the "**Motion to Quash**") filed on August 24, 2022 seeking entry of an order (1) quashing certain examination notices that John Patrick Lowe, Chapter 7 Trustee (the "**Trustee**") issued to the Subpoena Respondents pursuant to Federal Rule of Bankruptcy Procedure 2004 (the "**Rule 2004 Notices**"); (2) quashing certain subpoenas *duces tecum* the Trustee issued accompanying the Rule 2004 Notices (the "**Subpoenas**"); (3) granting protection in favor of the Subpoena Respondents in connection with the Trustee's Rule 2004 Notices and Subpoenas (collectively, the "**Discovery**"); and (4) granting the Subpoena Respondents related relief; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157(a)–(b) and 1334(b); and consideration of the Motion and the requested relief 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 due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT

1. The Motion is GRANTED.
2. The Trustee's Subpoenas are quashed with respect to the entirety of the requests for production set forth in Request Nos. 2, 6-7, and 9-10, 12-15, and 17-22.
3. The Trustee's Subpoenas are quashed as to the requests for production set forth in Request Nos. 4 and 8 to the extent these requests seek communications that occurred between any of the Subpoena Respondents and any non-Debtor third-parties.

4. The Trustee's Subpoenas are quashed as to the requests for production set forth in Request Nos. 11 and 16 except to the extent these requests seek information about transactions between Cycladic and PSI.

5. The Trustee's Rule 2004 Notice and the Subpoenas related thereto are quashed to the same extent as in Paragraphs 2 through 4 of this Order with respect to any Bankruptcy Rule 2004(b) inquiries or questions pertaining to the same quashed subject matter or topics as in Paragraphs 2 through 4 of this Order.

6. The Court shall retain jurisdiction to enforce and interpret this Order, along with any disputes related thereto.

###

PREPARED AND SUBMITTED BY:

Stephen J. Humeniuk
LOCKE LORD LLP
600 Congress Ave., Suite 2200
Austin, TX 78701
Telephone: (512) 305-4700
Facsimile: (512) 305-4800
stephen.humeniuk@lockelord.com

***Counsel for Cycladic International, LLC;
Cycladic, LLC; and Thomas N. Andrew***