

Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re:

deeproot Capital Management, LLC, *et al.*,¹

Debtors.

Chapter 7

Case No. 21-51523 (MMP)

(Jointly Administered)

**ORDER GRANTING MOTION TO (I) EXPEDITE MOTION TO QUASH
BANKRUPTCY RULE 2004 EXAMINATION NOTICES WITH SUBPOENA
DUCES TECUM, AND (II) SHORTEN AND PRESCRIBE NOTICE RELATED THERETO**

Upon the *Motion to (I) Expedite Motion to Quash Bankruptcy Rule 2004 Examination Notices with Subpoena Duces Tecum, and (II) Shorten and Prescribe Notice Related Thereto* (the “*Motion*”)² filed by Cycladic International, LLC, (“*Cycladic International*”), Cycladic, LLC

¹ 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).

² Capitalized terms used but not defined herein are intended to have the meanings ascribed to them in the Motion.

(“*Cycladic*”), and Thomas N. Andrew (“*Andrew*” and together with Cycladic International and Cycladic, the “*Movants*”) seeking entry of an 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 [Docket No. ___]. The Court finds that the Motion should be granted as set forth below.

IT IS, THEREFORE, ORDERED that the Motion to Quash is scheduled for expedited hearing on the date and time listed above.

IT IS FURTHER ORDERED that Movants must serve notice of the hearing on the Motion to Quash in accordance with Local Rule 9014(e) to (a) the Trustee; (b) counsel to the Trustee; (c) the lead Debtor; (d) counsel to the Debtors; (e) the U.S. Trustee; and (f) any other party having appeared and requested notice in the lead chapter 7 bankruptcy case.

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