

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

	X	
	:	Chapter 11
In re	:	
	:	Case No. 22-10951 (CTG)
KABBAGE, INC. d/b/a KSERVICING, et al.,	:	
	:	(Jointly Administered)
Debtors.¹	:	
	:	Obj. Deadline: Dec. 2, 2022, at 4:00 p.m. (ET)
	:	Hearing Date: To be determined
	:	
	:	Re: Docket Nos. 14, 63, 98 & 176

**NOTICE OF EXTENDED OBJECTION DEADLINE FOR AND CONTINUED HEARING
TO CONSIDER APPROVAL OF (I) THE DISCLOSURE STATEMENT AND
(II) THE RELIEF REQUESTED IN THE DISCLOSURE STATEMENT MOTION**

PLEASE TAKE NOTICE THAT on October 5, 2022, Kabbage, Inc. d/b/a KServicing and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), filed the *Disclosure Statement for the Joint Chapter 11 Plan of Liquidation Kabbage, Inc. (d/b/a KServicing) and its Affiliated Debtors* [Docket No. 63] (as may be amended, modified, or supplemented, the “**Disclosure Statement**”), and on October 12, 2022, the Debtors filed the *Notice of Hearing to Consider Approval of Disclosure Statement for the Joint Chapter 11 Plan of Liquidation of Kabbage, Inc. (d/b/a KServicing) and its Affiliated Debtors* [Docket No. 98] (the “**Disclosure Statement Notice**”), with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable are: Kabbage, Inc. d/b/a KServicing (3937); Kabbage Canada Holdings, LLC (N/A); Kabbage Asset Securitization LLC (N/A); Kabbage Asset Funding 2017-A LLC (4803); Kabbage Asset Funding 2019-A LLC (8973); and Kabbage Diameter, LLC (N/A). Kabbage is a trademark of American Express used under license; Kabbage, Inc. d/b/a KServicing is not affiliated with American Express. The Debtors’ mailing and service address is 925B Peachtree Street NE, Suite 383, Atlanta, GA 30309.

PLEASE TAKE FURTHER NOTICE THAT on October 31, 2022, the Debtors filed the *Motion of Debtors for Entry of Order (I) Approving the Disclosure Statement of the Debtors, (II) Establishing Solicitation, Voting, and Related Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of Plan, (V) Approving Special Electronic Noticing Procedures, (VI) Approving Debtors' Proposed Cure Procedures for Unexpired Leases and Executory Contracts, and (VII) Granting Related Relief* [Docket No. 176] (the “**Disclosure Statement Motion**”) with the Court. Pursuant to the Disclosure Statement Motion, the Debtors sought entry of an order (the “**Disclosure Statement Order**”), approving, among other things, the Disclosure Statement and the solicitation and voting procedures with respect to the *Joint Chapter 11 Plan of Liquidation Kabbage, Inc. (d/b/a KServicing) and its Affiliated Debtors* [Docket No. 14] (as may be amended, modified, or supplemented, the “**Plan**”).

PLEASE TAKE FURTHER NOTICE THAT pursuant to the Disclosure Statement Notice and the *Notice of Motion and Hearing* filed with the Disclosure Statement Motion, objections or responses to entry of the Disclosure Statement Order, including approval of the Disclosure Statement, were to be filed on or before November 14, 2022 at 4:00 p.m. (prevailing Eastern Time) (the “**Objection Deadline**”), and a hearing to consider entry of the Disclosure Statement Order, including approval of the Disclosure Statement, was scheduled for November 21, 2022 at 1:00 p.m. (prevailing Eastern Time) (the “**Hearing**”).

PLEASE TAKE FURTHER NOTICE THAT the Debtors hereby extend the Objection Deadline through and including **December 2, 2022, at 4:00 p.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE THAT the Hearing has been continued to a **date and time to be determined**. The date and time of the Hearing will be separately noticed upon receiving such date and time from the Court.

PLEASE TAKE FURTHER NOTICE THAT IF AN OBJECTION TO THE DISCLOSURE STATEMENT OR DISCLOSURE STATEMENT MOTION IS NOT FILED BY THE EXTENDED OBJECTION DEADLINE, THE OBJECTING PARTY MAY BE BARRED FROM OBJECTING TO THE DISCLOSURE STATEMENT OR THE ADEQUACY THEREOF, OR THE DISCLOSURE STATEMENT MOTION, AND MAY NOT BE HEARD AT THE HEARING. IF NO OBJECTIONS TO THE DISCLOSURE STATEMENT OR THE DISCLOSURE STATEMENT MOTION ARE TIMELY FILED AS SET FORTH HEREIN, THE COURT MAY ENTER THE DISCLOSURE STATEMENT ORDER WITHOUT FURTHER NOTICE OR HEARING. THIS NOTICE IS NOT A SOLICITATION OF VOTES TO ACCEPT OR REJECT THE PLAN. VOTES ON THE PLAN MAY NOT BE SOLICITED UNLESS AND UNTIL THE COURT ENTERS THE DISCLOSURE STATEMENT ORDER.

PLEASE TAKE FURTHER NOTICE THAT the Objection Deadline may be further extended or the Hearing continued or adjourned from time to time without further notice to parties in interest other than by an announcement in the Court of such extension or adjournment, or as indicated in any notice of hearing or agenda of matters scheduled for hearing filed by the Debtors with the Court.

Dated: November 11, 2022
Wilmington, Delaware

/s/ Matthew P. Milana

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