UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re	:	**Chapter 11**
KABBAGE, INC. d/b/a KSERVICING *et al.*,	:	**Case No. 22-10951 (CTG)**
Debtors.[1]	:	**(Jointly Administered)**
		Obj. Deadline: December 7, 2022 @ 4:00 p.m. (ET)

DECLARATION AND DISCLOSURE STATEMENT OF
JEFFREY J. CHAPMAN ON BEHALF OF McGUIREWOODS LLP

I, Jeffrey J. Chapman, hereby declare, pursuant to section 1746 of title 28 of the United States Code, that the following is true to the best of my knowledge, information, and belief:

1. I am a partner of McGuireWoods LLP located at 1251 Avenue of the Americas, 20th Floor, New York, NY 10020-1104 (the "**Firm**").

2. This declaration (the "**Declaration**") is submitted in accordance with the *Order Pursuant to 11 U.S.C. §§ 105(a), 327, and 330 Authorizing Debtors to Employ Professionals Used in Ordinary Course of Business* [Docket No. 196] (the "**OCP Order**"). Capitalized terms used herein but not otherwise defined herein shall have the meanings ascribed to such terms in the OCP Order.

3. Kabbage, Inc. d/b/a KServicing and its debtor affiliates, as debtors and debtors in possession (collectively, the "**Debtors**"), have requested that the Firm provide legal services to the Debtors, and the Firm has consented to provide such services. The Firm is a legal services firm providing legal services to the Debtors regarding regulatory matters.

[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.

4. The Firm has provided services to the Debtors prior to Petition Date.

5. The Firm will be compensated at its standard hourly rates, which are based on the professionals' level of experience. The Firm's current customary rates, subject to change from time to time, range from $525 per hour for Firm's newest associates to $1,585 per hour for Firm's most senior U.S. partners. In the normal course of its business, the Firm revises its regular rates on January 1 of each year and requests that, effective January 1 of each year, the aforementioned rates be revised to the regular hourly rates which will be in effect at that time.

6. The Firm may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons who are parties in interest in the Debtors' chapter 11 cases. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties-in-interest in these chapter 11 cases. The Firm does not perform services for any such person in connection with these chapter 11 cases. In addition, the Firm does not have any relationship with any such person, its attorneys, or accountants that would be adverse to the Debtors or their estates with respect to the matters on which the Firm is to be retained, except as set forth herein.

7. Neither I, nor any principal of, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principals and regular employees of the Firm.

8. Neither I, nor any principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates with respect to the matters on which the Firm is to be retained.

9. The Debtors owe the Firm $0 for prepetition services, the payment of which is subject to the limitations contained in the Bankruptcy Code.

10. For purposes of making the disclosures herein, the Firm searched the list of parties in interest attached hereto as **Exhibit A** in its conflict check system.

11. As of the Petition Date, the Firm was not party to an agreement for indemnification with the Debtors.

12. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: November 23, 2022

By: /s/ *Jeffrey J. Chapman*

EXHIBIT A

List of Parties in Interest

Kabbage, Inc. d/b/a KServicing – OCP PII List

1. Debtors

(1) Kabbage, Inc.
(2) Kabbage Asset Securitization LLC
(3) Kabbage Asset Funding 2017-A LLC
(4) Kabbage Asset Funding 2019-A LLC
(5) Kabbage Canada Holdings, LLC
(6) Kabbage Diameter, LLC

2. Non-Debtor Affiliates and Subsidiaries

(1) Kabbage Financial Services Limited (UK entity)
(2) Kabbage India Private Limited (India entity)

3. Debtors' Trade Names and Aliases

(1) d/b/a KServicing
(2) d/b/a KServicing Corp.
(3) d/b/a KServicing, Inc.

4. Current Officers and Directors

Officers

(1) David Walker
(2) Donna Evans
(3) Salim Kafiti
(4) Holly Loiseau
(5) Ian Cox
(6) Laquisha Milner

Directors

(1) Eric Hartz (d/b/a Corporate Hartz, LLC)
(2) Laquisha Milner
(3) Lawrence X. Taylor
(4) Robin Gregg

Independent Manager

(1) John Hebert

5. Former Officers and Directors (if available) (3 years)

(1) Daniel Scott Eidson
(2) Jon Hoffman
(3) Julia McCullough
(4) Kathryn Petralia
(5) Kimberly Withrow
(6) L. Scott Askins
(7) Marc Gorlin
(8) Oneal Bhambani
(9) Robert Frohwein
(10) Spencer Robinson
(11) Troy Deus

6. Debtors' Professionals

(1) AlixPartners, LLP
(2) Greenberg Traurig, LLP
(3) Jones Day
(4) Omni Agent Solutions
(5) Richards, Layton & Finger, P.A.
(6) Weil, Gotshal & Manges LLP

7. Adverse Parties

(1) U.S. Department of Justice
(2) U.S. Small Business Administration