

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

	X	
	:	
In re	:	Chapter 11
	:	
KABBAGE, INC. d/b/a KSERVICING, et al.,	:	Case No. 22-10951 (CTG)
	:	
	:	
Debtors.¹	:	(Jointly Administered)
	X	Re: Docket Nos. 336 & 355

DEBTORS' WITNESS LIST FOR JANUARY 6, 2023 HEARING

On December 7, 2022, Customers Bank (“CB”) filed the *Motion of Customers Bank for Entry of an Order (I) Compelling Compliance with Court Approved Settlement Agreement and Order; (II) Requiring Additional Adequate Protection in Favor of Customers Bank; and (III) Granting Related Relief* [Docket No. 336] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Bankruptcy Court**”). On December 21, 2022, Kabbage, Inc. d/b/a KServicing and its debtor affiliates, as debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”), filed in response the *Debtors’ Objection to Motion of Customers Bank for Entry of an Order (I) Compelling Compliance with Court Approved Settlement Agreement and Order; (II) Requiring Additional Adequate Protection in Favor of Customers Bank; and (III) Granting Related Relief* [Docket No. 355] (the “**Objection**”). The hearing on the Motion is scheduled for January 6, 2023 at 10:00 a.m. (ET) (the “**Hearing**”) and the deadline for CB to file a reply in further support of its Motion (“**Reply**”) is January 5, 2022 at

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.

10:00 a.m. (ET).

The Debtors are filing this witness list (this “**Witness List**”) in compliance with the *Chambers Procedures for Judge Craig T. Goldblatt*. The Debtors hereby identify the following individuals that they may call as witnesses:

1. Tamica M. Williams, the Debtors’ Corporate Controller — the scope of Ms. Williams testimony would be in support of the Objection;
2. Alyssa White, Senior VP for Customers Bank — the scope of Ms. White’s testimony would be in support of the Motion;
3. Other witnesses, if any, that the Debtors deem necessary after reviewing CB’s Reply;
4. Any rebuttal and/or impeachment witnesses;
5. Any witnesses designated by any other party; and
6. Any witnesses necessary to establish the admissibility of any document.

The Debtors reserve their right to amend and/or supplement this Witness List at any time prior to the Hearing.

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Dated: January 5, 2023
Wilmington, Delaware

/s/ Matthew P. Milana

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