

**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	:	Re: Docket Nos. 466 & 467
	:	
	X	

**NOTICE OF FILING OF SUPPLEMENT
TO THE AMENDED JOINT CHAPTER 11 PLAN OF LIQUIDATION
OF KABBAGE, INC. (d/b/a KSERVICING) AND ITS AFFILIATED DEBTORS**

PLEASE TAKE NOTICE that on October 3, 2022 (the “**Petition Date**”), 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**”), commenced cases under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that, on January 19, 2023, the Debtors filed the solicitation versions of the *Amended Joint Chapter 11 Plan of Liquidation of Kabbage, Inc. (d/b/a KServicing) and its Affiliated Debtors* [Docket No. 466] (as may be amended, further supplemented, or modified from time to time, the “**Plan**”) and the *Amended Disclosure Statement for the Amended Joint Chapter 11 Plan of Liquidation of Kabbage, Inc. (d/b/a KServicing) and Its*

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.

Affiliated Debtors [Docket No. 467] (as may be amended, further supplemented, or modified from time to time the “**Disclosure Statement**”) with the Court.²

PLEASE TAKE FURTHER NOTICE that, on January 19, 2023, the Court entered the *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* (the “**Disclosure Statement Order**”) that, among other things, approved the Disclosure Statement, authorized the Debtors to solicit votes to accept or reject the Plan, and scheduled a confirmation hearing of the Plan for March 13, 2023 at 10:00 a.m. (prevailing Eastern Time) (the “**Hearing**”). Pursuant to the Disclosure Statement Order, the Hearing may be continued from time to time without further notice other than an adjournment announced in open court or a notice of agenda filed with the Court.

PLEASE TAKE FURTHER NOTICE that, the Plan and Disclosure Statement contemplate the submission of certain documents, schedules, and exhibits (as they may be modified, amended, or supplemented from time to time, collectively, the “**Plan Supplement**”) in advance of the Hearing. The documents contained in this Plan Supplement are integral to, part of, and incorporated by reference into the Plan and the Disclosure Statement.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Plan and the Disclosure Statement Order, the Debtors hereby file the following Plan Supplement documents:

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Plan or Disclosure Statement, as applicable.

Exhibit	Plan Supplement Document
A	Assumption Schedule ³
B	Non-Exclusive Schedule of Causes of Action
C	Wind Down Budget
D	Selection of the Wind Down Officer
E	Wind Down Agreement

PLEASE TAKE FURTHER NOTICE that, certain documents, or portions thereof, contained in this Plan Supplement are not final and remain subject to continuing negotiations among the Debtors and other interested parties. Subject to the terms and conditions of the Plan and the Disclosure Statement Order, the Debtors reserve all rights to amend, revise, or supplement this Plan Supplement, and any of the documents and designations contained herein, at any time before the Effective Date of the Plan, or any such other date as may be provided for by the Plan, the Disclosure Statement Order, or by order of the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE that the Plan Supplement, including the documents therein, may be viewed free of charge by visiting the website maintained by the Debtors' claims, noticing and solicitation agent, Omni Agent Solutions, Inc. ("**Omni**"), at <http://www.omniagentsolutions.com/kservicing>. Additionally, copies of the Plan Supplement and the documents therein may be obtained by contacting Omni (i) in writing at Kabbage, Inc. d/b/a KServicing, *et al.*, c/o Omni Agent Solutions, Solicitation Team, 5955 De Soto Ave., Suite 100,

³ The Assumption Schedule attached to this Plan Supplement contains executory contracts and unexpired leases proposed to be assumed by the Debtors for use by the Wind Down Estates in both the PPP Transfer scenario and the Post-Effective Date Servicing scenario. In the event the Debtors elect to pursue the PPP Transfer scenario, the Debtors reserve the right to file a proposed assumption schedule identifying additional executory contracts and unexpired leases to be assumed and assigned to third parties, as applicable. Alternatively, in the event the Debtors elect to pursue the Post-Effective Date Servicing scenario, the Debtors reserve the right to file a proposed assumption schedule identifying additional executory contracts and unexpired leases to be assumed for the benefit of the Wind Down Estates. The Assumption Schedule is being filed for informational purposes. Counterparties to any contracts or leases that are proposed to be assumed pursuant to the Plan will receive separate notice of the deadline to object to such assumption and the related cure amount.

Woodland Hills, CA 91367, (ii) by email at kservicinginquiries@omniagnt.com, or (iii) by telephone at 866-956-2138 (U.S. & Canada toll free) or 747-226-5953 (international). You may also obtain copies of any pleadings filed in these chapter 11 cases, including the Plan Supplement, for a fee via PACER at <http://www.deb.uscourts.gov>.

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Dated: February 21, 2023
Wilmington, Delaware

/s/ Matthew P. Milana

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