

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re	X	
	:	Chapter 11
	:	
KABBAGE, INC. d/b/a KSERVICING <i>et al.</i> ,	:	Case No. 22-10951 (CTG)
	:	
	:	(Jointly Administered)
Debtors. ¹	:	
	X	Re: Docket No. ____

**ORDER GRANTING DEBTORS’ MOTION FOR LEAVE TO FILE DEBTORS’
REPLY IN SUPPORT OF DEBTORS’ MOTION FOR ENTRY OF AN ORDER (I)
AUTHORIZING AND APPROVING THE SETTLEMENT AGREEMENT BETWEEN
KSERVICING AND CUSTOMERS BANK AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “**Motion for Leave**”)² of 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**”), for entry of an order pursuant to Local Rule 9006-1(d), granting the Debtors leave to file their Reply in support of the 9019 Motion, all as more fully set forth in the Motion for Leave; and this Court having jurisdiction to consider the Motion for Leave and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and consideration of the Motion for Leave and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion for Leave having been provided to the Notice Parties and such notice having been adequate and appropriate under the

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.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion for Leave.

circumstances; and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion for Leave; and this Court having determined that the legal and factual bases set forth in the Motion for Leave establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion for Leave is in the best interests of the Debtors, their estates, creditors, and all parties in interest; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT

1. The Motion for Leave is granted to the extent set forth herein.
2. The Debtors are granted leave and permission to file and serve the Reply, and the Court will consider the Reply at the hearing on November 7, 2022 at 1:00 p.m. (prevailing Eastern Time).
3. The Debtors are authorized to take all actions necessary or appropriate to carry out the relief granted in this Order.
4. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.