

EXHIBIT A

[Proposed Order Granting Motion to Seal]

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

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

**ORDER APPROVING MOTION OF CUSTOMERS BANK FOR AUTHORIZATION TO
SEAL EXHIBITS A AND C TO THE DECLARATION OF ALYSSA WHITE IN
SUPPORT OF 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**

Upon consideration of the *Motion of Customers Bank for Authorization to Seal Exhibits A and C to the Declaration of Alyssa White 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* (the “Motion to Seal”); and the Court having reviewed all pleadings related thereto; and the Court having determined that there exists just cause for the relief granted therein;

IT IS HEREBY ORDERED THAT:

1. The Motion to Seal is GRANTED; and

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. Customer Bank is hereby granted permission to file Exhibits A and C to the White Declaration² under seal pursuant to Federal Rule 9018 and Local Rule 9018-1(b).

Dated: _____, 2022

The Honorable Craig T. Goldblatt
United States Bankruptcy Judge

² Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion to Seal.