Exhibit A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: **KABBAGE, INC. d/b/a KSERVICING**, *et al.*,[1] Debtors.	Chapter 11 Case No. 22-10951 (CTG) (Jointly Administered)

ORDER APPROVING STIPULATION
TO EXTEND PAUL PIETSCHNER'S DEADLINE TO
FILE A COMPLAINT TO DETERMINE DISCHARGEABILITY OF DEBT

Upon consideration of the *Certification of Counsel Submitting Proposed Order Approving Stipulation to Extend Paul Pietschner's Deadline to File a Complaint to Determine Dischargeability of Debt* (the "**Stipulation**")[2] by and between the above-captioned debtors (collectively, the "**Debtors**") and Paul Pietschner ("**Pietschner**," and together with the Debtors, the "**Parties**"), through their respective counsel, a copy of which is attached hereto as **Exhibit 1** and related certification of counsel; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED:

1. The Stipulation is approved.

[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) (the "Company"); 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 herein but not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

2. The deadline for Paul Pietschner to file a complaint to determine dischargeability under 11 U.S.C. § 523(c) shall be extended from January 9, 2023, to the date which is twenty-one days following the entry of an order confirming any plan, without prejudice to Paul Pietschner's right to seek further extension of the Nondischargeability Deadline, and without prejudice to the Debtors' rights, objections, or defense related thereto.

3. The Parties are authorized to take any and all actions reasonably necessary to effectuate the terms of the Stipulation.

4. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.

5. Notwithstanding any Federal Rule of Bankruptcy Procedure or Local Rule of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware that might otherwise delay the effectiveness of this Order, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

Exhibit 1

Stipulation

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re: **KABBAGE, INC. d/b/a KSERVICING**, *et al.*,[1] Debtors.	Chapter 11 Case No. 22-10951 (CTG) (Jointly Administered)

STIPULATON TO EXTEND PAUL PIETSCHNER'S DEADLINE TO FILE A COMPLAINT TO DETERMINE DISCHARGEABILITY OF DEBT

The above-captioned debtors (collectively, the "**Debtors**") and Paul Pietschner ("**Pietschner**," and together with the Debtors, the "**Parties**") enter into this stipulation to extend the deadline to file a complaint to determine the dischargeability of debt under 11 U.S.C. § 523. The Parties stipulate as follows:

1. Pietschner is the relator in a proceeding commenced under the False Claims Act, 31 U.S.C. Sec. 3729 et seq, which remains under seal.

2. On October 3, 2022 (the "**Petition Date**"), the Debtors filed their voluntary petitions for relief under chapter 11 of the title 11 of the United States Code.

3. On November 10, 2022, the meeting of creditors pursuant to 11 U.S.C. § 341 was scheduled and conducted (the "**341 Meeting**").

4. Pursuant to Federal Rule of Bankruptcy Procedure 4007(c), a party in interest may file a complaint under 11 U.S.C. § 523(c) within sixty days after the first date set for the 341 Meeting.

[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) (the "Company"); 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.

5. Accordingly, the deadline for filing a complaint under 11 U.S.C. § 523(c) is January 9, 2023 (the "**Nondischargeability Deadline**").

NOW, THEREFORE, the Parties agree as follows:

1. The Nondischargeability Deadline for Paul Pietschner to file a complaint to determine the dischargeability of debt under 11 U.S.C. § 523(c) shall be extended through and including the date which is twenty-one days following the entry of an order confirming any plan.

2. Any extension of the Nondischargeability Deadline is without prejudice to Paul Pietschner's right to seek additional extensions and the Debtors' rights, objections, or defenses related thereto.

3. This stipulation may be executed in counterparts, each of which shall be deemed an original and such counterparts shall together constitute a single agreement. Any signature, including an electronic signature, transmitted by facsimile or electronic mail shall be deemed an original signature to this Stipulation.

/s/ Zachary I. Shapiro
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