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.

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