EXHIBIT A

I. Document Requests

1. All documents constituting the loan files of Customers Bank borrowers serviced by the Debtor, including without limitation applications, tax forms, resolution to borrower forms, notes, and supporting borrower documents.

2. All documents constituting the servicing file(s) for Customers Bank borrowers serviced by the Debtor.

3. All documents evidencing communications between the Debtor and Customers Bank borrowers, including without limitation emails and recorded calls and billing and payment information for loans with a remaining balance.

4. All documents evidencing fraud reviews performed by the Debtor with respect to Customers Bank borrowers, including without limitation Know Your Customer ("KYC") and/or Know Your Business ("KYB") investigations made by the Debtor regarding Customers Bank borrowers, incident reports and associated narratives, questionable activity reports, fraud flag categories and flag explanations, and results of screening procedures (such as Threatmetrix, Lexis/Nexis, Experian, GIAC).

5. All documents evidencing borrower payments, including without limitation ACH detail for payments.

6. All documents evidencing SBA guaranty purchase submissions and underlying eligibility documents and transcript assignment forms.

7. All documents regarding forgiveness applications submitted to the SBA for Customers Bank borrowers, including without limitation the data extract from the Biz2Credit platform.

8. All documents evidencing which Customers Bank loans are impacted by the SBA's "excess loan amount" hold, including without limitation reports with loan level detail on actions taken by Kabbage on the "excess loan amount issue."

9. All documents evidencing communications with the SBA regarding processing forgiveness and/or guaranty on loans with an "excess loan amount" issue, including without limitation any SBA requirements for processing forgiveness and guaranty on the "excess loan" population.

10. All documents evidencing third party audit and governance requirements and communications with respect to the Debtor's servicing of the Customers Bank loans.

11. All plans, timelines, or statements of work regarding the transition of servicing from the Debtor to Customers Bank.

II. <u>Deposition Topics</u>

1. The documents requested above.

2. The location, transfer status, technical specifications, and transferability of the data: (a) necessary to transfer the loan servicing to Customers Bank; and (b) requested by Customers Bank from the Debtor to effect the transfer of loan servicing to Customers Bank.