

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

	X	
	:	Chapter 11
In re	:	
	:	Case No. 22-10951 (CTG)
KABBAGE, INC. d/b/a KSERVICING, et al.,	:	
	:	(Jointly Administered)
Debtors.¹	:	
	:	
	:	Re: Docket No. 627 & 632
	X	

NOTICE OF FILING OF REVISED PROPOSED CONFIRMATION ORDER

PLEASE TAKE NOTICE that, on March 9, 2023, 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**”), filed the *Amended Joint Chapter 11 Plan of Liquidation of Kabbage, Inc. (d/b/a KServicing) and Its Affiliated Debtors* [Docket No. 627] (including all exhibits and supplements thereto, and as modified or amended from time to time, the “**Plan**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that, on March 9, 2023, the Debtors filed a proposed form of order confirming the Plan [Docket No. 632] (the “**Proposed Order**”).

PLEASE TAKE FURTHER NOTICE that the Debtors hereby file a revised version of the Proposed Order (the “**Revised Order**”) reflecting certain comments received from certain parties in interest. A copy of the Revised Order is attached hereto as **Exhibit A**. For 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.

convenience of the Court and all parties in interest, a blackline comparison of the Revised Order marked against the Proposed Order is attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that a hearing to consider confirmation of the Plan and entry of the Revised Order is scheduled for **March 13, 2023 at 10:00 a.m. (ET)** (the “**Hearing**”) before the Honorable Craig T. Goldblatt, United States Bankruptcy Judge for the District of Delaware, 824 North Market Street, Third Floor, Courtroom 7, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that the Debtors intend to present the Revised Order, substantially in the form attached hereto, to the Court at the Hearing. To the extent the Debtors make revisions to the Revised Order, the Debtors intend to submit a further revised form of order to the Court prior to or at the Hearing.

[Remainder of page intentionally left blank]

Dated: March 12, 2023
Wilmington, Delaware

/s/ Matthew P. Milana

RICHARDS, LAYTON & FINGER, P.A.

Daniel J. DeFranceschi, Esq. (No. 2732)

Amanda R. Steele, Esq. (No. 5530)

Zachary I. Shapiro, Esq. (No. 5103)

Matthew P. Milana, Esq. (No. 6681)

One Rodney Square

920 North King Street

Wilmington, Delaware 19801

Telephone: (302) 651-7700

E-mail: defranceschi@rlf.com

steele@rlf.com

shapiro@rlf.com

milana@rlf.com

-and-

WEIL, GOTSHAL & MANGES LLP

Ray C. Schrock, Esq. (admitted *pro hac vice*)

Candace M. Arthur, Esq. (admitted *pro hac vice*)

Natasha S. Hwangpo, Esq. (admitted *pro hac vice*)

Chase A. Bentley, Esq. (admitted *pro hac vice*)

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

E-mail: ray.schrock@weil.com

candace.arthur@weil.com

natasha.hwangpo@weil.com

chase.bentley@weil.com

Attorneys for Debtors and Debtors in Possession