UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re	:	**Chapter 11**
KABBAGE, INC. d/b/a KSERVICING, *et al.*,	:	**Case No. 22-10951 (CTG)**
Debtors.[1]	:	**(Jointly Administered)**
	:	**Re: Docket No. 627, 632 & 655**

CERTIFICATION OF COUNSEL
REGARDING 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 "**Amended Plan**") with the United States Bankruptcy Court for the District of Delaware (the "**Court**").

PLEASE TAKE FURTHER NOTICE that, on March 12, 2023, the Debtors filed a revised form of order confirming the Amended Plan [Docket No. 655] (the "**Proposed Confirmation Order**").

PLEASE TAKE FURTHER NOTICE that, on March 13, 2023, the Court held a hearing (the "**Hearing**") to consider, among other things, confirmation of the Amended Plan.

[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.

Consistent with the Court's ruling at the Hearing and to memorialize certain agreements between the Debtors and certain parties in interest, the Debtors have prepared a further revised form of the Proposed Confirmation Order (the "**Revised Confirmation Order**"), attached hereto as **Exhibit 1**, and a revised Amended Plan (the "**Revised Amended Plan**"), attached to the Revised Confirmation Order as Exhibit A thereto. The Revised Confirmation Order and the Revised Amended Plan have been circulated to the Office of the United States Trustee for the District of Delaware, and counsel to the Federal Reserve Bank of San Francisco and Cross River Bank, and the aforementioned parties do not object to the entry of the Revised Confirmation Order and the confirmation of the Revised Amended Plan. For the convenience of the Court and all parties in interest, a redline comparison of the Revised Confirmation Order marked against the Proposed Confirmation Order is attached hereto as **Exhibit 2**, and a changed-pages-only comparison of the Revised Amended Plan marked against the Amended Plan is attached hereto as **Exhibit 3**.

[*Remainder of page intentionally left blank*]

WHEREFORE the Debtors respectfully request that the Revised Confirmation Order be entered at the earliest convenience of the Court.

Dated: March 14, 2023
Wilmington, Delaware

/s/ Matthew P. Milana

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