

**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

MOTION AND ORDER FOR ADMISSION *PRO HAC VICE*

Pursuant to Local Rule 9010-1 and the attached certification, undersigned counsel moves the admission *pro hac vice* of Robert F. Longtin of Quinn Emanuel Urquhart and Sullivan, LLP, to represent Cross River Bank in the above-captioned cases and any related proceedings.

Respectful submitted,

Date: March 13, 2023
Wilmington, Delaware

BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP

/s/ Gregory W. Werkheiser

Gregory W. Werkheiser (No. 3553)
1313 North Market Street, Ste. 1201
Wilmington, DE 19801
(302) 442-7010
Email: gwerkheiser@beneschlaw.com

Counsel for Cross River Bank

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.

CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE*

Pursuant to Local Rule 9010-1, I certify that I am eligible for admission to this Court, am admitted, practicing, and in good standing as a member of the Bars of the States of New York Texas, and submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules and with the Standing Order for District Court Fund revised August 31, 2016. I further certify that the annual fee of \$25.00 has been paid to the Clerk of the Court for the District Court.

Date: March 13, 2023

/s/ Robert F. Longtin
Robert F. Longtin
Quinn Emanuel Urquhart & Sullivan, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Email: robertlongtin@quinnemanuel.com

ORDER GRANTING MOTION

IT IS HEREBY ORDERED counsel's motion for admission *pro hac vice* is granted.



Dated: March 13th, 2023
Wilmington, Delaware

CRAIG T. GOLDBLATT
UNITED STATES BANKRUPTCY JUDGE