

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

KABBAGE, INC. d/b/a KSERVICING, et al.,Debtors.¹

Chapter 11

Case No. 22-10951 (CTG)

(Jointly Administered)

Re: Dkt. Nos. 592 & 627

**CROSS RIVER BANK’S EXHIBIT LIST FOR THE MARCH 13, 2023 CONFIRMATION
HEARING AT 10:00 A.M.**

Cross River Bank (“Cross River”) hereby discloses the exhibits that it may rely on at the March 13, 2023 hearing in support of its *Limited Objection and Reservation of Rights of Cross River Bank to Confirmation of Debtors’ Chapter 11 Plan* [ECF 592].

Cross River reserves the right to introduce at the Hearing documents that are part of the record of the above-captioned chapter 11 cases, including pleadings and other documents filed on the docket (including those not listed herein), as well as to introduce any document, or to rebut the testimony of witnesses or evidence presented by any other party, or for impeachment.

No.	Document Description
1	December 8, 2022 email from Matthew Scheck to Candace Arthur and Ms. Arthur’s response confirming receipt [ECF 623-1]
2	January 17, 2023 Order Approving Stipulation Between the Debtors and Cross River Bank [ECF 444 & ECF 444-1].
3	January 13, 2023 letter from Theodore Tsekerides to James Bromley, and the document requests attached thereto [ECF 623-3]
4	January 11, 2023 email from Matthew Scheck to Candace Arthur, and the documents attached thereto

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) (collectively, the “Debtors”).

5	Debtors' Liquidation Analysis (ECF 454-3)
6	Disclosure Statement Order (ECF 470)
7	Motion to Approve Disclosure Statement (ECF 176)
8	Debtors' Omnibus Reply re Disclosure Statement (ECF 449)
9	Cross River Proof of Claim #155

Dated: March 10, 2023
Wilmington, Delaware

Respectfully submitted,

**BENESCH, FRIEDLANDER, COPLAN &
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