

Exhibit 4

Weil, Gotshal & Manges LLP

VIA E-MAIL

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January 13, 2023

James L. Bromley, Esq.
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Re: *In re Kabbage, Inc. d/b/a KServicing, et al.*, Case No. 22-10951

Dear Jim:

Following up on our discussions regarding the need for the Debtors to obtain loan servicing information in the possession of Amex Kabbage, attached is a schedule identifying particular information requested by the Debtors, as well as general matters that will be necessary to transition loan servicing from Amex Kabbage. Certain of the requested information is more immediately necessary and critical for the Debtors to run the PPP business, and Amex Kabbage is obligated under the Transition Services Agreement, dated as of October 16, 2020 and as amended on November 13, 2020 (“TSA”), by and between American Express Kabbage Inc., (formerly Alpha Kabbage, Inc.) (“Amex Kabbage”) and Kabbage, Inc. (“Legacy Kabbage”) to provide such information to the Debtors. Moreover, given that the TSA expressly contemplated Amex Kabbage would ultimately transition its services under the TSA, it is appropriate to undertake the steps necessary toward that transition. To that end, other items requested on the attached schedule address that transition as well. Note, while we believe the particular information requested in the schedule is comprehensive, we reserve the right to supplement should additional items be required.

In light of the importance of this information to the Debtors’ proper fulfillment of their loan servicing obligations and the administration of the Debtors’ estates, the Debtors request that Amex Kabbage voluntarily provide the information specified in the schedule as soon as possible, especially as relates to the more specific requests.

We believe it is in all parties’ interests to work cooperatively in transitioning these materials to the Debtors as quickly as possible. Accordingly, by January 19, 2023, please confirm that Amex Kabbage is willing to provide the requested material, and that it will do so by February 17, 2023. As you are aware, the Federal Reserve and certain of the Debtors’ partner banks are especially eager to have this information made available to the Debtors so that the Debtors, or another entity, can better service the applicable loans. The information is further required in connection with the Debtors’ ongoing administration and is additionally necessary to respond to certain third-party regulatory requests. For these reasons, and given

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the importance of the materials to the Debtor's estates, if Amex Kabbage opposes providing the requested information, the Debtors will file a motion for entry of an order directing Amex Kabbage to produce the requested information pursuant to Bankruptcy Rule 2004 and Rule 2004-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware. We hope you will work cooperatively to provide all the requested materials and information to avoid our having to file a motion.

If Amex Kabbage is unwilling to provide the information or believes to be unable to do so before February 17, 2023, please let us know if you are available on Tuesday next week to meet and confer about the requests.

Sincerely,



Theodore E. Tsekerides

Encl.

cc: Candace M. Arthur, candace.arthur@weil.com
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