

Exhibit A

Williams Declaration

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

In re

KServicing Wind down Corp., *et al.*,¹

Post-Confirmation Debtors.

Chapter 11

Case No. 22-10951 (CTG)

(Jointly Administered)

**DECLARATION OF TAMICA M. WILLIAMS IN SUPPORT OF
POST-CONFIRMATION DEBTORS’
OBJECTION TO THE APPLICATION OF BIZ2CREDIT INC. FOR
ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM**

I, Tamica M. Williams, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I was the Corporate Controller of Kabbage, Inc. d/b/a KServicing (“**Kabbage**”). I served as the Corporate Controller from November 2021 through June 2023, and I have been providing consulting services to the Post-Confirmation Debtors on an as needed basis. As Corporate Controller, I established and implemented financial policies and controls, supervised all accounting and financial functions, and prepared financial statements.

2. I submit my declaration in further support of the *Post-Confirmation Debtors’ Objection to the Application of Biz2credit Inc. for Allowance and Payment of Administrative*

¹ The post-confirmation Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable are: KServicing Wind Down Corp. (f/k/a Kabbage, Inc. d/b/a KServicing) (3937); KServicing Wind Down Canada Holdings LLC (f/k/a Kabbage Canada Holdings, LLC) (N/A); KServicing Wind Down Asset Securitization LLC (f/k/a Kabbage Asset Securitization LLC) (N/A); KServicing Wind Down Asset Funding 2017-A LLC (f/k/a Kabbage Asset Funding 2017-A LLC) (4803); KServicing Wind Down Asset Funding 2019-A LLC (f/k/a Kabbage Asset Funding 2019-A LLC) (8973); and KServicing Wind Down Diameter LLC (f/k/a Kabbage Diameter, LLC) (N/A). The Debtors’ mailing and service address is KServicing Wind Down Corp. c/o Resolute Commercial Services, 6750 E. Camelback Road, Suite 103, Scottsdale, AZ 85251.

Expense Claim (the “**Objection**”) filed contemporaneously herewith.² I am generally knowledgeable about the commercial dealings between Biz2Credit and Kabbage. Except as otherwise indicated, the facts set forth in this declaration are based upon my personal knowledge, my review of relevant documents and databases that are prepared, maintained, and utilized by Kabbage in the ordinary course of its business, as well as the information provided to me by other employees of Kabbage. If called upon to testify, I would testify to the facts set forth in this declaration.

3. Kabbage and Biz2Credit are parties to that certain Referral and Marketing Agreement dated January 18, 2021 (the “**Referral Agreement**”).

4. Kabbage and Biz2Credit are also parties to that certain Software License Agreement dated April 28, 2021 (as amended by the First Amendment to the Software License Agreement dated October 3, 2022) (the “**Platform Agreement**”).

5. As of June 6, 2022, the outstanding fees owed under the Referral Agreement were no less than \$1,031,000. It is my understanding that Biz2Credit’s Asserted Claim is \$371,570. Accordingly, I believe that the Kabbage Counterclaim exceeds the Asserted Claim by an amount no less than \$659,430.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 8, 2023
Atlanta, Georgia

/s/ Tamica M. Williams
Tamica M. Williams

² Capitalized terms used but not defined in this declaration shall have the meanings defined to them in the Objection.