

**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)

Re: Docket No. 1185

CERTIFICATE OF NO OBJECTION REGARDING DOCKET NO. 1185

The undersigned counsel hereby certifies as follows:

On December 15, 2025, the post-confirmation Debtors (the “Post-Confirmation Debtors”), operating as the Wind Down Estates as defined in, and under terms of, the *Amended Joint Chapter 11 Plan of Liquidation of Kabbage, Inc. (d/b/a KServicing) and Its Affiliated Debtors*, dated March 9, 2023 [Docket No. 627] (as amended, modified, or supplemented in accordance with its terms), filed the *KServicing Wind Down Corporation’s Fifth (Substantive) Omnibus Objection to Certain (I) No Liability Claims, and (II) Unliquidated Claims* (the “Objection”) [Docket No. 1185] with the United States Bankruptcy Court for the District of Delaware (the “Court”).

The deadline to respond to the Objection was January 5, 2026 at 4:00 p.m. (ET).

The undersigned further certifies that after reviewing the Court’s docket in this case, no formal answer, objection, or other responsive pleading to the Objection appears thereon. The

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: 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 925B Peachtree Street NE, Suite 383, Atlanta, GA 30309.

Post-Confirmation Debtors respectfully request that the Court enter the Order granting the Objection, a copy of which is attached hereto and to the Objection as **Exhibit A**.

Dated: January 6, 2026

MORRIS JAMES LLP

/s/ Samantha L. Rodriguez

Eric J. Monzo (DE Bar No. 5214)

Brya M. Keilson (DE Bar No. 4643)

Samantha L. Rodriguez (DE Bar No. 7524)

3205 Avenue North Blvd., Suite 100

Wilmington, DE 19803

Telephone: (302) 888-6800

Facsimile: (302) 571-1750

E-mail: emonzo@morrisjames.com

bkeilson@morrisjames.com

srodriguez@morrisjames.com

and

PERKINS COIE LLP

Bradley A. Cosman (admitted *pro hac vice*)

Kathleen Allare (admitted *pro hac vice*)

2525 E. Camelback Road, Suite 500

Phoenix, Arizona 85016

Telephone: (602) 351-8000

Facsimile: (602) 648-7000

E-mail: BCosman@perkinscoie.com

KAllare@perkinscoie.com

and

John D. Penn (admitted *pro hac vice*)

500 North Akard Street, Suite 3300

Dallas, TX 75201-3347

Telephone: (214) 965-7700

Facsimile: (214) 965-7799

E-mail: JPenn@perkinscoie.com

*Counsel to the Post-Confirmation Debtors,
operating as the Wind Down Estates*