

**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

**NOTICE OF SUBMISSION OF PROOFS OF CLAIM IN CONNECTION
WITH KSERVICING WIND DOWN CORPORATION'S FIFTH
(SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN
(I) NO LIABILITY CLAIMS, AND (II) UNLIQUIDATED CLAIMS**

On December 15, 2025, KServicing Wind Down Corporation ("KServicing WD") and its affiliates, as successors to Kabbage, Inc. d/b/a KServicing ("KServicing") and its affiliates, by and through their undersigned counsel, filed the *KServicing Wind Down Corporation's Fifth (Substantive) Omnibus Objection to Certain (I) No Liability Claims, and (II) Unliquidated Claims* [Docket No. 1185] (the "Objection") with the United States Bankruptcy Court for the District of Delaware. A hearing on the Objection is to be held on **January 14, 2026 at 10:00 a.m. (ET)**.

Pursuant to Del. Bankr. L.R. 3007-1(e)(iv), copies of the proofs of claim (the "Proofs of Claim")² to which KServicing WD objected to under Del. Bankr. L.R. 3007-1 have been delivered to Chambers together with a copy of the Objection.

This notice of submission of proofs of claims has been served upon all parties requesting notice under Fed. R. Bankr. P. 2002 in compliance with Del. Bankr. L.R. 3007-1(e)(iv)(C). Any

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.

² Pursuant to the Local Rules, a copy of all claims referenced in the Objection have been included in the submission to Chambers.

parties who wish to acquire copies of the Proofs of Claim may do so by making a request to the undersigned counsel.

Dated: December 31, 2025

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, Delaware 19803
Telephone: (302) 888-6800
Facsimile: (302) 571-1750
E-mail: emonzo@morrisjames.com
E-mail: bkeilson@morrisjames.com
E-mail: 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 85016-4227
Telephone: (602) 351-8000
Facsimile: (602) 648-7000
E-mail: BCosman@perkinscoie.com
E-mail: KAllare@perkinscoie.com

and

John D. Penn (admitted *pro hac vice*)
500 North Akard Street, Suite 3300
Dallas, Texas 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*