EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
KServicing Wind Down Corp., *et al*.,[1]	Case No. 22-10951 (CTG)
Post-Confirmation Debtors.	(Jointly Administered)
	Re: Docket No. _____

ORDER SUSTAINING KSERVICING WIND DOWN CORPORATION'S FIFTH (SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN (I) NO LIABILITY CLAIMS, AND (II) UNLIQUIDATED CLAIMS

Upon the objection (the "**Objection**")[2] of the post-confirmation Debtors' wind down estates ("**KServicing Wind Down Estates**"), for entry of an order (this "**Order**") sustaining the Objection and disallowing and expunging in its entirety the claims listed in **Schedule 1** (the "**No Liability Claims**") and **Schedule 2** (the "**Unliquidated Claims**") attached hereto (the "**Disputed Claims**"), and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the relief requested therein has been provided in accordance

[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] Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to them in the Objection.

with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the KServicing Wind Down Estates, their estates, their creditors, and other parties in interest; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore;

IT IS HEREBY ORDERED THAT:

1. The Objection is **SUSTAINED** as provided herein.

2. The Disputed Claims are hereby disallowed and expunged in their entirety.

3. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any claims referenced or identified in the Objection other than the Disputed Claims listed on **Schedule 1** and **Schedule 2**, attached hereto.

4. The Wind Down Officer's right to object on any other grounds that he or KServicing Wind Down Estates discovers is preserved.

5. KServicing Wind Down Estates and the Wind Down Officer are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

6. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights KServicing Wind Down Estates or the Wind Down Officer may have to enforce rights of setoff against the Claimants.

7. Nothing in the Objection or this Order, nor any actions or payments made by KServicing Wind Down Estates pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against KServicing Wind Down Estates under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Wind Down Officer's or any other party in interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the KServicing Wind Down Estates or the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

8. The Wind Down Officer's objection to each of the No Liability Claims and Unliquidated Claims addressed in the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each claim. Any stay of this Order pending appeal by any of the Claimants subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters addressed in the Objection and this Order.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. Stretto, Inc., KServicing Wind Down Estates' noticing and claims agent, is authorized to update the Claims Register to reflect the relief granted in this Order.

11. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Schedule 1
No Liability Claims

Claimant	Claim Date Filed	Claim Number	Debtor & Case No.	Claim Amount	Reason for Disallowance
Bhambani, Oneal Address on file	11/29/2022	85	Kabbage, Inc. d/b/a KServicing 22-10951	Unknown/Unliquidated General Unsecured	Claims must be disallowed for no liability because indemnification shall be rejected as of the Effective Date pursuant to Section 8.5 of the Plan and related sections.
Douglas, James Address on file	11/29/2022	3	Kabbage Diameter, LLC 22-10956	Unknown/Unliquidated General Unsecured	Claims must be disallowed for no liability because indemnification shall be rejected as of the Effective Date pursuant to Section 8.5 of the Plan and related sections.
Douglas, James Address on file	11/29/2022	92	Kabbage, Inc. d/b/a Kservicing 22-10951	Unknown/Unliquidated General Unsecured	Claims must be disallowed for no liability because indemnification shall be rejected as of the Effective Date pursuant to Section 8.5 of the Plan and related sections.
Goldberg, Laura Address on file	11/30/2022	130	Kabbage, Inc. d/b/a Kservicing 22-10951	Unknown/Unliquidated General Unsecured	Claims must be disallowed for no liability because indemnification shall be rejected as of the Effective Date pursuant to Section 8.5 of the Plan and related sections.
Jain, Deepesh Address on file	11/30/2022	5	Kabbage Asset Funding 2017-A, LLC 22-10954	Unknown/Unliquidated General Unsecured	Claims must be disallowed for no liability because indemnification shall be rejected as of the Effective Date pursuant to Section 8.5 of the Plan and related sections.
Jain, Deepesh Address on file	11/30/2022	7	Kabbage Asset Funding 2019-A, LLC 22-10955	Unknown/Unliquidated General Unsecured	Claims must be disallowed for no liability because indemnification shall be rejected as of the Effective Date pursuant to Section 8.5 of the Plan and related sections.
Jain, Deepesh Address on file	11/30/2022	127	Kabbage, Inc. d/b/a Kservicing 22-10951	Unknown/Unliquidated General Unsecured	Claims must be disallowed for no liability because indemnification shall be rejected as of the Effective Date pursuant to Section 8.5 of the Plan and related sections.
McGowan, David Address on file	11/29/2022	89	Kabbage, Inc. d/b/a Kservicing 22-10951	Unknown/Unliquidated General Unsecured	Claims must be disallowed for no liability because indemnification shall be rejected as of the Effective Date pursuant to Section 8.5 of the Plan and related sections.
Mendel, Rebecca Address on file	11/29/2022	111	Kabbage, Inc. d/b/a Kservicing 22-10951	Unknown/Unliquidated General Unsecured	Claims must be disallowed for no liability because indemnification shall be rejected as of the Effective Date pursuant to Section 8.5 of the Plan and related sections.
Zimmerman, Amy Address on file	11/29/2022	114	Kabbage, Inc. d/b/a Kservicing 22-10951	Unknown/Unliquidated General Unsecured	Claims must be disallowed for no liability because indemnification shall be rejected as of the Effective Date pursuant to Section 8.5 of the Plan and related sections.

Schedule 2
Unliquidated Claims

Claimant	Claim Date Filed	Claim Number	Debtor & Case No.	Claim Amount	Reason for Disallowance
Bhambani, Oneal Address on file	11/29/2022	85	Kabbage, Inc. d/b/a KServicing 22-10951	Unknown/Unliquidated General Unsecured	Claim asserts a contingent, unliquidated amount and lacks sufficient information to determine value.
Douglas, James Address on file	11/29/2022	3	Kabbage Diameter, LLC 22-10956	Unknown/Unliquidated General Unsecured	Claim asserts a contingent, unliquidated amount and lacks sufficient information to determine value.
Douglas, James Address on file	11/29/2022	92	Kabbage, Inc. d/b/a Kservicing 22-10951	Unknown/Unliquidated General Unsecured	Claim asserts a contingent, unliquidated amount and lacks sufficient information to determine value.
Goldberg, Laura Address on file	11/30/2022	130	Kabbage, Inc. d/b/a Kservicing 22-10951	Unknown/Unliquidated General Unsecured	Claim asserts a contingent, unliquidated amount and lacks sufficient information to determine value.
Jain, Deepesh Address on file	11/30/2022	5	Kabbage Asset Funding 2017-A, LLC 22-10954	Unknown/Unliquidated General Unsecured	Claim asserts a contingent, unliquidated amount and lacks sufficient information to determine value.
Jain, Deepesh Address on file	11/30/2022	7	Kabbage Asset Funding 2019-A, LLC 22-10955	Unknown/Unliquidated General Unsecured	Claim asserts a contingent, unliquidated amount and lacks sufficient information to determine value.
Jain, Deepesh Address on file	11/30/2022	127	Kabbage, Inc. d/b/a Kservicing 22-10951	Unknown/Unliquidated General Unsecured	Claim asserts a contingent, unliquidated amount and lacks sufficient information to determine value.
McGowan, David Address on file	11/29/2022	89	Kabbage, Inc. d/b/a Kservicing 22-10951	Unknown/Unliquidated General Unsecured	Claim asserts a contingent, unliquidated amount and lacks sufficient information to determine value.
Mendel, Rebecca Address on file	11/29/2022	111	Kabbage, Inc. d/b/a Kservicing 22-10951	Unknown/Unliquidated General Unsecured	Claim asserts a contingent, unliquidated amount and lacks sufficient information to determine value.
Zimmerman, Amy Address on file	11/29/2022	114	Kabbage, Inc. d/b/a Kservicing 22-10951	Unknown/Unliquidated General Unsecured	Claim asserts a contingent, unliquidated amount and lacks sufficient information to determine value.