UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re	:	**Chapter 11**
KABBAGE, INC. d/b/a KSERVICING, *et al.*,	:	**Case No. 22-10951 (CTG)**
Debtors.[1]	:	**(Jointly Administered)**

NOTICE OF AGENDA FOR HEARING SCHEDULED FOR NOVEMBER 21, 2022 AT 1:00 P.M. (PREVAILING EASTERN TIME), BEFORE THE HONORABLE CRAIG T. GOLDBLATT, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

AS NO MATTERS ARE SCHEDULED TO GO FORWARD, THE HEARING HAS BEEN CANCELLED WITH PERMISSION FROM THE COURT.

I. CONTINUED MATTERS:

1. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue Using Existing Cash Management System, Bank Accounts, and Business Forms, (B) Implement Changes to Cash Management in the Ordinary Course of Business; and (II) Granting Related Relief [Docket No. 12 – filed October 3, 2022]

   Objection/Response Deadline: October 31, 2022, at 4:00 p.m. (ET); extended by agreement to January 12, 2023 at 4:00 p.m. (ET) for Office of the United States Trustee (the "U.S. Trustee")

   Objections/Responses Received:

   A. Informal comments received from the U.S. Trustee

   Related Documents:

   i. Emergency Bridge Order Authorizing Debtors' Postpetition Use of Cash Management System on an Interim Basis Pending a Further Hearing [Docket No. 43 – entered October 4, 2022]

[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: Kabbage, Inc. d/b/a KServicing (3937); Kabbage Canada Holdings, LLC (N/A); Kabbage Asset Securitization LLC (N/A); Kabbage Asset Funding 2017-A LLC (4803); Kabbage Asset Funding 2019-A LLC (8973); and Kabbage Diameter, LLC (N/A). Kabbage is a trademark of American Express used under license; Kabbage, Inc. d/b/a KServicing is not affiliated with American Express. The Debtors' mailing and service address is 925B Peachtree Street NE, Suite 383, Atlanta, GA 30309.

ii. Interim Order (I) Authorizing (A) Debtors to Continue Using Existing Cash Management System, Bank Accounts, and Business Forms, (B) Implement Changes to Cash Management in the Ordinary Course of Business; and (II) Granting Related Relief [Docket No. 78 – entered October 6, 2022]

iii. Notice of (A) Entry of Interim Order (I) Authorizing (A) Debtors to Continue Using Existing Cash Management System, Bank Accounts, and Business Forms, (B) Implement Changes to Cash Management in the Ordinary Course of Business; and (II) Granting Related Relief; and (B) Final Hearing Thereon [Docket No. 84 – filed October 26, 2022]

iv. Certification of Counsel Regarding Second Interim Order (I) Authorizing (A) Debtors to Continue Using Existing Cash Management System, Bank Accounts, and Business Forms, (B) Implement Changes to Cash Management in the Ordinary Course of Business; and (II) Granting Related Relief [Docket No. 191 – filed November 1, 2022]

v. Second Interim Order (I) Authorizing (A) Debtors to Continue Using Existing Cash Management System, Bank Accounts, and Business Forms, (B) Implement Changes to Cash Management in the Ordinary Course of Business; and (II) Granting Related Relief [Docket No. 195 – entered November 2, 2022]

Status: The hearing on this matter has been adjourned to the omnibus hearing scheduled for January 19, 2023 at 10:00 a.m. (ET). The Debtors intend to submit a further interim order under certification of counsel with the agreement of the U.S. Trustee.

2. Motion of Debtors for Entry of Order (I) Approving the Disclosure Statement of the Debtors, (II) Establishing Solicitation, Voting, and Related Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of Plan, (V) Approving Special Electronic Noticing Procedures, (VI) Approving Debtors' Proposed Cure Procedures for Unexpired Leases and Executory Contracts, and (VII) Granting Related Relief [Docket No. 176 – filed October 31, 2022]

Objection/Response Deadline: November 14, 2022, at 4:00 p.m. (ET); extended to December 2, 2022 at 4:00 p.m. (ET)

Objections/Responses Received:

A. Informal comments received from the U.S. Trustee

Related Documents:

i. Joint Chapter 11 Plan of Liquidation Kabbage, Inc. (d/b/a KServicing) and its Affiliated Debtors [Docket No. 14 – filed October 4, 2022]

ii. Disclosure Statement for the Joint Chapter 11 Plan of Liquidation of Kabbage, Inc. (d/b/a KServicing) and its Affiliated Debtors [Docket No. 63 – filed October 5, 2022]

iii. Notice of Hearing to Consider Approval of Disclosure Statement for the Joint Chapter 11 Plan of Liquidation of Kabbage, Inc. (d/b/a KServicing) and its Affiliated Debtors [Docket No. 98 – filed October 12, 2022]

iv. Notice of Extended Objection Deadline for and Continued Hearing to Consider Approval of (I) the Disclosure Statement and (II) the Relief Requested in the Disclosure Statement Motion [Docket No. 246 – filed November 11, 2022]

v. Notice of Continued Hearing to Consider Approval of (I) the Disclosure Statement and (II) the Relief Requested in the Disclosure Statement Motion [Docket No. 252 – filed November 15, 2022]

Status: The hearing on this matter has been adjourned to December 14, 2022 at 3:00 p.m. (ET).

Dated: November 17, 2022
Wilmington, Delaware

/s/ Amanda R. Steele

RICHARDS, LAYTON & FINGER, P.A.
Daniel J. DeFranceschi, Esq. (No. 2732)
Amanda R. Steele, Esq. (No. 5530)
Zachary I. Shapiro, Esq. (No. 5103)
Matthew P. Milana, Esq. (No. 6681)
One Rodney Square
920 North King Street
Wilmington, Delaware 19801
Telephone: (302) 651-7700
E-mail: defranceschi@rlf.com
steele@rlf.com
shapiro@rlf.com
milana@rlf.com

-and-

WEIL, GOTSHAL & MANGES LLP
Ray C. Schrock, P.C. (admitted *pro hac vice*)
Candace M. Arthur, Esq. (admitted *pro hac vice*)
Natasha S. Hwangpo, Esq. (admitted *pro hac vice*)
Chase A. Bentley, Esq. (admitted *pro hac vice*)
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
E-mail: ray.schrock@weil.com
candace.arthur@weil.com
natasha.hwangpo@weil.com
chase.bentley@weil.com

Attorneys for Debtors
and Debtors in Possession