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)**
	:	**Re: Docket No. 176 & 398**

NOTICE OF FILING OF FURTHER REVISED 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

PLEASE TAKE NOTICE THAT on October 31, 2022, Kabbage, Inc. d/b/a KServicing and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "**Debtors**"), filed the *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] (the "**Motion**") with 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: 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.

United States Bankruptcy Court for the District of Delaware (the "**Court**"). A proposed form of order granting the relief requested in the Motion was attached to the Motion as Exhibit A (the "**Proposed Order**").

PLEASE TAKE FURTHER NOTICE THAT on December 30, 2022, the Debtors filed a revised version of the Proposed Order (the "**Revised Order**") under notice at Docket No. 398.

PLEASE TAKE FURTHER NOTICE THAT the Debtors hereby file a further revised version of the Proposed Order (the "**Further Revised Order**"), a copy of which is attached hereto as **Exhibit 1**. For the convenience of the Court and all parties in interest, a blackline comparison of the Further Revised Order marked against the Revised Order is attached hereto as **Exhibit 2**.

PLEASE TAKE FURTHER NOTICE THAT the Debtors intend to present the Further Revised Order to the Court at the hearing currently scheduled for **January 19, 2023 at 10:00 a.m. (prevailing Eastern Time)** before The Honorable Craig T. Goldblatt, United States Bankruptcy Judge, in the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Courtroom 7, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE THAT the Debtors reserve the right to amend, modify, or supplement the Further Revised Order. To the extent that the Debtors make further revisions to the Further Revised Order, the Debtors will file a further revised order with the Court.

[*Remainder of page intentionally left blank*]

Dated: January 17, 2023
Wilmington, Delaware

/s/ Matthew P. Milana

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