

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

	X	
	:	Chapter 11
In re	:	
	:	Case No. 22-10951 (CTG)
KABBAGE, INC. d/b/a KSERVICING, et al.,	:	
	:	(Jointly Administered)
Debtors.¹	:	
	:	
	:	Re: Docket Nos. 14, 63, 395, 396, 453 & 454
	X	

**NOTICE OF BLACKLINES OF (I) AMENDED JOINT CHAPTER 11 PLAN
OF LIQUIDATION OF KABBAGE, INC. (d/b/a KSERVICING) AND ITS
AFFILIATED DEBTORS AND (II) AMENDED DISCLOSURE STATEMENT
FOR THE JOINT CHAPTER 11 PLAN OF LIQUIDATION OF
KABBAGE, INC. (d/b/a KSERVICING) AND ITS AFFILIATED DEBTORS**

PLEASE TAKE NOTICE THAT on October 4, 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 *Joint Chapter 11 Plan of Liquidation of Kabbage, Inc. (d/b/a KServicing) and its Affiliated Debtors* [Docket No. 14] (the “**Plan**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE THAT on October 5, 2022, the Debtors filed the *Disclosure Statement for the Joint Chapter 11 Plan of Liquidation of Kabbage, Inc. (d/b/a KServicing) and its Affiliated Debtors* [Docket No. 63] (the “**Disclosure Statement**”) with the Court.

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.

PLEASE TAKE FURTHER NOTICE THAT on December 30, 2022, the Debtors filed an amended version of the Plan [Docket No. 395] (the “**Amended Plan**”) and an amended version of the Disclosure Statement [Docket No. 396] (the “**Amended Disclosure Statement**”).

PLEASE TAKE FURTHER NOTICE THAT on January 17, 2023, the Debtors filed a second amended version of the Plan [Docket No. 453] (the “**Second Amended Plan**”) and a second amended version of the Disclosure Statement [Docket No. 454] (the “**Second Amended Disclosure Statement**”).

PLEASE TAKE FURTHER NOTICE THAT, for the convenience of the Court and all parties in interest, a blackline comparison of the Second Amended Plan marked against the Amended Plan is attached hereto as **Exhibit 1**, and a blackline comparison of the Second Amended Disclosure Statement marked against the Amended Disclosure Statement is attached hereto as **Exhibit 2**.

PLEASE TAKE FURTHER NOTICE THAT the Debtors reserve the right to amend, modify, or supplement the Second Amended Plan and the Second Amended Disclosure Statement. To the extent that the Debtors make further revisions to the Second Amended Plan or the Second Amended Disclosure Statement, the Debtors will file further revised copies of such documents with the Court.

PLEASE TAKE FURTHER NOTICE THAT the Second Amended Plan and the Second Amended Disclosure Statement are subject to ongoing negotiations between the Debtors and their stakeholders.

Dated: January 17, 2023
Wilmington, Delaware

/s/ Matthew P. Milana

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