

**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, 466 & 467
	X	

**NOTICE OF BLACKLINES OF SOLICITATION VERSIONS 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 AMENDED 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] and an amended version of the Disclosure Statement [Docket No. 396].

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 on January 19, 2023, the Debtors filed the solicitation version of the Plan [Docket No. 466] (the “**Solicitation Version of Plan**”) and the solicitation version of the Disclosure Statement [Docket No. 467] (the “**Solicitation Version of Disclosure Statement**”).

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

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Dated: January 19, 2023
Wilmington, Delaware

/s/ Matthew P. Milana

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