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. 576**

DECLARATION OF THEODORE E. TSEKERIDES IN SUPPORT OF MOTION OF DEBTORS PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004 FOR PRODUCTION OF DOCUMENTS FROM FINANCIAL TECHNOLOGY PARTNERS LP AND FTP SECURITIES LLC

Pursuant to 28 U.S.C. § 1746, I, Theodore E. Tsekerides, hereby declare under penalty of perjury as follows:

1. I am a partner at Weil, Gotshal & Manges LLP and counsel for Kabbage, Inc. d/b/a KServicing (the "**Debtors**") in the above captioned cases. I am admitted *pro hac vice* to the Court for these cases. I submit this declaration on behalf of the Debtors in support of the *Motion of Debtors Pursuant to Federal Rule of Bankruptcy Procedure 2004 for Production of Documents from Financial Technology Partners LP and FTP Securities LLC* (the "**Motion**"), filed concurrently herewith.[2]

[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.

[2] All capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Motion.

2. Attached hereto as Exhibit 1 is a true and correct copy of the June 23, 2020 Minutes of a Special Meeting of the Board of Directors of Kabbage, Inc.

3. Attached hereto as Exhibit 2 is a true and correct copy the December 15, 2022 Letter from the Debtors' counsel to FT Partners requesting production of certain documents related to the AmEx Transaction for the Debtors' examination.

4. Attached hereto as Exhibit 3 is a true and correct copy of a December 27, 2023 email chain between the Debtors' counsel and FT Partners' counsel.

5. Attached hereto as Exhibit 4 is a true and correct copy of a January 10, 2023 email chain between the Debtors' counsel and FT Partners' counsel.

6. Attached hereto as Exhibit 5 is a true and correct copy of a January 29, 2023 email chain between the Debtors' counsel and FT Partners' counsel.

7. Attached hereto as Exhibit 6 is a true and correct copy of a February 3, 2023 email chain between the Debtors' counsel and FT Partners' counsel.

8. Attached hereto as Exhibit 7 is a true and correct copy of a February 7, 2023 email sent from FT Partners' counsel to the Debtors' counsel.

9. Attached hereto as Exhibit 8 is a true and correct copy of a February 16, 2023 email chain between the Debtors' counsel and FT Partners' counsel.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 24, 2023
New York, New York

/s/ Theodore E. Tsekerides
THEODORE E. TSEKERIDES