

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

|                                                |   |                                      |
|------------------------------------------------|---|--------------------------------------|
|                                                | X |                                      |
|                                                | : | <b>Chapter 11</b>                    |
| <b>In re</b>                                   | : |                                      |
|                                                | : | <b>Case No. 22-10951 (CTG)</b>       |
| <b>KABBAGE, INC. d/b/a KSERVICING, et al.,</b> | : |                                      |
|                                                | : | <b>(Jointly Administered)</b>        |
| <b>Debtors.<sup>1</sup></b>                    | : |                                      |
|                                                | : |                                      |
|                                                | : | <b>Re: Docket Nos. 466 &amp; 627</b> |
|                                                | X |                                      |

**NOTICE OF BLACKLINE OF AMENDED JOINT CHAPTER 11 PLAN  
OF LIQUIDATION OF KABBAGE, INC. (d/b/a KSERVICING)  
AND ITS AFFILIATED DEBTORS**

**PLEASE TAKE NOTICE THAT**, on January 19, 2023, 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 solicitation version of the *Amended Joint Chapter 11 Plan of Liquidation of Kabbage, Inc. (d/b/a KServicing) and its Affiliated Debtors* [Docket No. 466] (the “**Solicitation Plan**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

**PLEASE TAKE FURTHER NOTICE THAT**, on March 9, 2023, the Debtors filed the *Amended Joint Chapter 11 Plan of Liquidation of Kabbage, Inc. (d/b/a KServicing) and its Affiliated Debtors* [Docket No. 627] (as may be further amended, modified and/or supplemented, the “**Revised Plan**”), reflecting certain technical modifications and comments received from certain parties.

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<sup>1</sup> 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**, for the convenience of the Court and all parties in interest, a blackline comparison of the Revised Plan marked against the Solicitation Plan is attached hereto as **Exhibit 1**.

**PLEASE TAKE FURTHER NOTICE** that a hearing to consider confirmation of the Revised Plan has been scheduled for **March 13, 2023 at 10:00 a.m. (ET)** (the “**Hearing**”) before the Honorable Craig T. Goldblatt, United States Bankruptcy Judge for the District of Delaware, 824 North Market Street, Third Floor, Courtroom 7, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE** that the Debtors intend to seek confirmation of the Revised Plan at the Hearing. To the extent the Debtors make any modifications to the Revised Plan, the Debtors intend to submit a revised version of such document and a blackline comparison to the Court prior to or at the Hearing.

*[Remainder of page intentionally left blank]*

Dated: March 9, 2023  
Wilmington, Delaware

/s/ Matthew P. Milana

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