

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re	X	
	:	Chapter 11
	:	
KABBAGE, INC. d/b/a KSERVICING, <i>et al.</i> ,	:	Case No. 22-10951 (CTG)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	
	:	Re: Docket Nos. 721 & 754
	:	
	X	

**CERTIFICATE OF NO OBJECTION REGARDING
DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING
AND APPROVING THE LOAN TRANSFER AGREEMENT BETWEEN
KSERVICING, LENDISTRY SBLC, LLC, AND THE FEDERAL RESERVE BANK
OF SAN FRANCISCO; (II) AUTHORIZING DEBTORS TO TAKE ALL ACTIONS
TO FACILITATE TRANSFER OF CERTAIN SERVICING RIGHTS AND
OBLIGATIONS; AND (III) GRANTING RELATED RELIEF**

The undersigned hereby certifies that 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**”), have received no answer, objection or any other responsive pleading with respect to the *Debtors’ Motion for Entry of an Order (I) Authorizing and Approving the Loan Transfer Agreement Between KServicing, Lendistry SBLC, LLC, and the Federal Reserve Bank of San Francisco: (II) Authorizing Debtors to Take all Actions to Facilitate Transfer of Certain Servicing Rights and Obligations; and (III) Granting Related Relief* [Docket No. 721] (the “**Motion**”)² filed by the Debtors with the United States Bankruptcy

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 Capitalized terms that are used herein and not otherwise defined shall have the meanings given to them in the Motion.

Court for the District of Delaware (the “**Court**”) on March 23, 2023. The undersigned further certifies that no answer, objection or other responsive pleading to the Motion has appeared on the Court’s docket in the above-captioned chapter 11 cases. Pursuant to the *Notice of Motion and Hearing* filed with the Motion, any objection or response to the relief requested in the Motion was to be filed and served no later than April 6, 2023 at 4:00 p.m. (prevailing Eastern Time).

WHEREFORE, the Debtors respectfully request that an order (the “**Proposed Order**”),³ substantially in the form attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

[Remainder of page intentionally left blank.]

³ The Proposed Order incorporates the revised schedule of Transferred Loans (the “**Revised Schedule**”) filed with the *Notice of Filing of Revised Exhibit to Loan Transfer Agreement* on April 5, 2023 [Docket No. 754]. The Revised Schedule is attached to the Loan Transfer Agreement as **Exhibit A** thereto. The Loan Transfer Agreement is attached to the Proposed Order as **Exhibit 1** thereto.

Dated: April 11, 2023
Wilmington, Delaware

/s/ Huiqi Liu

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