

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re	X	
	:	Chapter 11
	:	
KServicing Wind Down Corp., <i>et al.</i> ,	:	Case No. 22-10951 (CTG)
	:	
	:	(Jointly Administered)
Post-Confirmation Debtors. ¹	:	
	X	Re: Docket Nos. 914, 915, 916, 917, 918, 919 & 959

**CERTIFICATION OF COUNSEL REGARDING *REVISED* OMNIBUS
ORDER AWARDING FINAL ALLOWANCE OF COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES**

The undersigned hereby certifies as follows:

1. In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals*, entered October 21, 2022 [Docket No. 136] (the “**Interim Compensation Order**”), the *Amended Joint Chapter 11 Plan of Liquidation of Kabbage, Inc. (d/b/a KServicing) and its Affiliated Debtors* [D.I. 627], and the *Order Confirming Amended Joint Chapter 11 Plan of Liquidation of Kabbage, Inc. (d/b/a KServicing) and its Affiliated Debtors* [D.I. 680], those professionals listed on **Exhibit A** attached hereto (each, an “**Applicant**” and collectively, the “**Applicants**”) filed their respective final fee applications [Docket Nos. 914, 915, 916, 917, 918 & 919] (collectively, the “**Final Fee Applications**”) with the United States Bankruptcy Court for the District of Delaware (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: KServicing Wind Down Corp. (f/k/a Kabbage, Inc. d/b/a KServicing) (3937); KServicing Wind Down Canada Holdings LLC (f/k/a Kabbage Canada Holdings, LLC) (N/A); KServicing Wind Down Asset Securitization LLC (f/k/a Kabbage Asset Securitization LLC) (N/A); KServicing Wind Down Asset Funding 2017-A LLC (f/k/a Kabbage Asset Funding 2017-A LLC) (4803); KServicing Wind Down Asset Funding 2019-A LLC (f/k/a Kabbage Asset Funding 2019-A LLC) (8973); and KServicing Wind Down Diameter LLC (f/k/a Kabbage Diameter, LLC) (N/A). The Debtors’ mailing and service address is 925B Peachtree Street NE, Suite 383, Atlanta, GA 30309.

2. On August 17, 2023, the Debtors filed the *Certification of Counsel Regarding Omnibus Order Awarding Final Allowance of Compensation for Services Rendered and Reimbursement of Expenses* [Docket No. 959]. Attached thereto as Exhibit A was a proposed form of order approving the Final Fee Applications (the “**Proposed Order**”).

3. Following the submission of the Proposed Order, the Court made certain comments with respect to the Final Fee Application of Richards, Layton & Finger, P.A. (“**RL&F**”). The comments made by the Court were resolved by agreed upon reductions by RL&F, which are reflected in a revised form of the Proposed Order (the “**Revised Order**”). A copy of the Revised Order is attached hereto as **Exhibit A**. For the convenience of the Court and all parties in interest, a blackline comparison of the Revised Order marked against the Proposed Order is attached hereto as **Exhibit B**.

(Remainder of Page Intentionally Left Blank)

WHEREFORE, the Debtors respectfully request that the Revised Order, substantially in the form attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

Dated: August 31, 2023
Wilmington, Delaware

/s/ Matthew P. Milana

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