IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: KSERVICING WIND DOWN CORP., *et al.*,[1] Post-Confirmation Debtors.	Chapter 11 Case No. 22-10951 (CTG) (Jointly Administered)
KSERVICING WIND DOWN CORP. (f/k/a Kabbage, Inc.), Plaintiff, v. AMERICAN EXPRESS KABBAGE INC. (f/k/a Alpha Kabbage, Inc.) and AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC., Defendants.	Adversary Proceeding No. 25-52371 (CTG)

MOTION AND ORDER FOR ADMISSION *PRO HAC VICE*

Pursuant to Del. Bankr. L.R. 9010-1 and the below certification, counsel moves for the admission *pro hac vice* of Eric D. Madden of Reid Collins & Tsai LLP, 1601 Elm Street, Suite 4200, Dallas, Texas 75201 to represent KServicing Wind Down Corp. (f/k/a Kabbage, Inc. d/b/a KServicing) ("Kabbage") in this action.

Dated: January 7, 2026
Wilmington, Delaware

MORRIS JAMES LLP

/s/ Brya M. Keilson
Brya M. Keilson (DE Bar No. 4643)
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[1] The post-confirmation 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 KServicing Wind Down Corp. c/o Resolute Commercial Services, 6750 E. Camelback Road, Suite 103, Scottsdale, AZ 85251.

CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE*

Pursuant to Local Rule 9010-1, I certify that I am eligible for admission to this Court, and am admitted, practicing, and in good standing as a member of the Bar of the States of Texas and New York. I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules and with the Standing Order for District Court Fund effective 12/21/23. I further certify that the fee of $50.00 has been paid to the Clerk of Court for District Court.

Dated: January 7, 2026

/s/ Eric D. Madden

Eric D. Madden
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ORDER GRANTING MOTION

IT IS HEREBY ORDERED that counsel's motion for admission *pro hac vice* is granted.