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. ROBERT FROHWEIN, KATHRYN PETRALIA, LESLIE SCOTT ASKINS, SPENCER ROBINSON, SAM TAUSSIG, DON BUTLER, JONATHAN EBINGER, ALEX CHULACK, LAURIE HODRICK, BRYAN STOLLE, IOANNIS PIPILIS, THOMVEST VENTURES LTD., BLUERUN VENTURES IV, LP, BRV OPPORTUNITIES FUND, L.P., REVERENCE CAPITAL PARTNERS OPPORTUNITIES FUND I, L.P., REVERENCE CAPITAL PARTNERS OPPORTUNITIES FUND I (CAYMAN), L.P., RCP KICKER CO-INVEST, L.P., REVERENCE CAPITAL PARTNERS OPPORTUNITIES FUND I (AI), L.P., MDV IX, L.P., SOFTBANK VISION FUND (AIV M2) L.P., SOFTBANK PRINCEVILLE INVESTMENTS, L.P., CURIEUX LIMITED CO., BENNU HOLDINGS LIMITED CO., RAYMOND JAMES & ASSOCIATES, INC. CSDN FBO ROBERT FROHWEIN RIRA U/A/D 5/27/16 A/C 2867A298, and THE FROHWEIN FAMILY 2015 TRUST, Defendants.	Adversary Proceeding No. 25-52372 (CTG)

[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.

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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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
REID COLLINS & TSAI LLP
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ORDER GRANTING MOTION

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