

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
<p>Caption in Compliance with D.N.J. LBR 9004-1(b)</p> <p>SHERMAN, SILVERSTEIN, KOHL, ROSE & PODOLSKY, P.A. Arthur J. Abramowitz Ross J. Switkes 308 Harper Drive, Suite 200 Moorestown, New Jersey 08057 Tel: (856) 662-0700 Email: aabramowitz@shermansilverstein.com rswitkes@shermansilverstein.com</p> <p><i>Counsel to Kato International LLC</i></p>	<p>LAW OFFICES OF JACK J. ROSE PLLC Jack J. Rose (<i>pro hac vice</i>) 250 Park Avenue 7th Floor, Suite 7014 New York, NY 10177 Tel: (212) 655-3066 Email: jrose@jrlpllc.com</p> <p><i>Counsel to Kato International LLC</i></p>
<p>In re:</p> <p>WEWORK INC., <i>et. al.</i>,</p> <p style="text-align: center;">Debtors.¹</p>	<p>Case No. 23-19865 (JKS)</p> <p>Chapter 11</p> <p>Honorable John K. Sherwood, U.S.B.J.</p>

**KATO INTERNATIONAL LLC’S JOINDER AND RESERVATION OF RIGHTS
WITH RESPECT TO DEBTORS’ MOTION
FOR ENTRY OF AN ORDER SETTING BAR DATES FOR
SUBMITTING PROOFS OF CLAIM, ETC.**

Kato International LLC (“**Kato**” or “**Landlord**”), by and through its undersigned counsel, respectfully submits this joinder and reservation of rights (the “**Joinder**”) with respect to the *Debtors’ Motion for Entry of an Order Setting Bar Dates for Submitting Proofs of Claim, Etc.* (Docket No. 1108) (the “**Motion**”). In support of its Joinder, Kato submits the following:

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/WeWork>. The location of Debtor WeWork Inc.’s principal place of business is 12 East 49th Street, 3rd Floor, New York, NY 10017; and the Debtors’ service address in these chapter 11 cases is: WeWork Inc. c/o Epiq Corporate Restructuring, LLC 10300 SW Allen Blvd. Beaverton, OR 97005.

BACKGROUND

1. 12 East 49th Street Tenant LLC (“**WeWork**”, “**Tenant**” or, the “**Debtor**”), one of the debtors in these cases, is party to a lease with Kato².

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2. On January 23, 2024, certain landlords filed a *Limited Objection of Multiple Landlords to Debtors’ Motion for Entry of an Order Setting Bar Dates for Submitting Proofs of Claim, Etc.* (Docket No. 1198) (the “**Objection**”). Kato joins in the Objection to the extent that it is not inconsistent with the interests of Kato³.

3. This Joinder is not, nor shall it be deemed to be, (a) a waiver or release of any of Kato’s rights against any person, entity, or property; (b) an election of remedies; or (c) a waiver or release of any claims that are currently owing and not identified in this Joinder and/or claims that may become due and owing to the Landlord subsequent to the filing of this Joinder.

4. Kato expressly reserves all of its rights to assert administrative claims, rejection damages, and any other applicable claims against the Debtors. Kato further reserves all rights with respect to this Joinder, including the right to amend and/or otherwise supplement this Joinder prior to any hearing related to the Motion.

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² The relationship between WeWork and Kato began with that certain Office Lease between Kato International LLC and 12 East 49th Street Tenant LLC, dated July 29, 2016, pursuant to which WeWork initially occupied floors 2 through 11 at Tower 49 located at 12 East 49th Street, New York, New York. The lease was subsequently amended to provide for, *inter alia*, WeWork taking occupancy of an additional ten floors, for a total of 20 floors and approximately three hundred and seventeen thousand (317,000) square feet of Class A Office space. WeWork’s headquarters is presently housed at Tower 49 located at 12 East 49th Street, New York, New York.

³ Kato also expressly reserves its rights to assert claims for administrative rent for the period from the date of the filing of these cases to date and for all other amounts of rent during this case which WeWork has failed to timely pay when due and owing as well as any all other amounts, including but not limited to, additional rent which may be or may become due and owing under the Lease during these cases.

WHEREFORE, Kato respectfully requests that the Court deny the relief requested in the Motion to the extent set forth in the Objection and grant such further relief as is appropriate under the circumstances.

Dated: January 24, 2024

/s/ Arthur J. Abramowitz

**SHERMAN, SILVERSTEIN,
KOHL, ROSE & PODOLSKY, P.A.**

Arthur J. Abramowitz

Ross J. Switkes

308 Harper Drive, Suite 200

Moorestown, NJ 08057

Tel: (856) 662-0700

Email: aabramowitz@shermansilverstein.com

rswitkes@shermansilverstein.com

LAW OFFICES OF JACK J. ROSE PLLC

Jack J. Rose (*pro hac vice*)

250 Park Avenue

7th Floor, Suite 7014

New York, NY 10177

Tel: (212) 655-3066

Email: jrose@jrlpllc.com

[Mailing Address]

PO Box 366

Bronxville, New York 10708