

RIKER DANZIG LLP

Joseph L. Schwartz, Esq.
Tara J. Schellhorn, Esq.
Daniel A. Bloom, Esq.
Gregory S. Toma, Esq.
Headquarters Plaza, One Speedwell Avenue
Morristown, New Jersey 07962-1981
Telephone: (973) 538-0800
Facsimile: (973) 538-1984
jschwartz@riker.com
tschellhorn@riker.com
dbloom@riker.com
gtoma@riker.com

*Co-Counsel to Trustee for the
WeWork UCC Settlement Trust
Created Under Confirmed Plan*

SQUIRE PATTON BOGGS (US) LLP

Jeffrey N. Rothleder, Esq. (admitted *pro hac vice*)
2550 M Street NW
Washington, DC 20037
Telephone: (202) 457-6000
Facsimile: (202) 457-6315
jeffrey.rothleder@squirepb.com

Maura P. McIntyre, Esq. (admitted *pro hac vice*)
1000 Key Tower
127 Public Square
Cleveland, OH 44114
Telephone: (216) 479-8715
Facsimile: (216) 479-8780
maura.mcintyre@squirepb.com

*Co-Counsel to Trustee for the
WeWork UCC Settlement Trust
Created Under Confirmed Plan*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

WEWORK INC., et al.,

Reorganized Debtors.¹

Chapter 11

Case No. 23-19865 (JKS)

(Jointly Administered)

**NOTICE OF THE WEWORK UCC SETTLEMENT TRUST TRUSTEE’S
OBJECTION TO YOUR CLAIM**

PLEASE TAKE NOTICE that Entity Services (SPV), LLC, as Trustee of the WeWork UCC Settlement Trust (respectively, the “Trustee” and the “Trust”) established pursuant to the *Third Amended Joint Chapter 11 Plan of Reorganization of WeWork Inc. and its Debtor Subsidiaries (Further Technical Modifications)* [Docket No. 2051] (the “Plan”) in the above-

¹ The Reorganized Debtor with an open case remaining in these chapter 11 cases (along with the last four digits of its federal tax identification number) is WeWork Inc. (4904). A complete list of each of the Reorganized Debtors whose chapter 11 cases have been closed may be obtained on the website of the Reorganized Debtor’s claims and noticing agent at <https://dm.epiq11.com/WeWork>. The location of the Reorganized Debtor’s principal place of business is 71 5th Avenue, 2nd Floor, New York, NY 10003; the Reorganized Debtor’s service address in these chapter 11 cases is WeWork Inc. c/o Epiq Corporate Restructuring, LLC 10300 SW Allen Blvd. Beaverton, OR 97005.

captioned bankruptcy cases are objecting to your Claim(s)² pursuant to the attached objection (the “Objection”).

Important Information Regarding the Objection

YOU SHOULD LOCATE YOUR REFERENCE NUMBER OR CLAIM NUMBER AND YOUR CLAIM(S) ON THE SCHEDULES ATTACHED HERETO. PLEASE TAKE NOTICE THAT YOUR CLAIM(S) MAY BE DISALLOWED, EXPUNGED, RECLASSIFIED, MODIFIED, REDUCED, OR OTHERWISE AFFECTED AS A RESULT OF THE OBJECTION. THEREFORE, PLEASE READ THIS NOTICE AND THE ACCOMPANYING OBJECTION VERY CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.

Grounds for the Objection. Pursuant to the Objection, the Trustee is seeking to reduce, modify, and/or disallow and expunge your Claim(s) listed in the Schedules to the Proposed Order attached to the Objection, a copy of which has been provided with this Notice.

Objection Procedures. On May 8, 2024, the United States Bankruptcy Court for the District of New Jersey (the “Court”) entered an order [Docket No. 1892] (the “Order”) approving procedures for filing and resolving objections to Claims asserted against the Debtors in these chapter 11 cases, which are attached to the Order at Exhibit 1. On September 27, 2024, the Trustee filed a *Notice of Filing of Amended Procedures for Filing and Serving Omnibus Claims Objections and Notices of Satisfaction of Claims* [Docket No. 2325] (the “Amended Claim Objection Procedures”), which incorporated certain non-material modifications to the original Claims procedures attached to the Order, as authorized therein. *Please review the Amended Claim Objection Procedures carefully to ensure your response to the Objection, if any, is filed and served timely and correctly. You may obtain a copy of the Order as set forth in the Additional Information section below.*

Resolving the Objection(s) to Your Claim(s)

1. Resolving Objections. Claimants that hold Claims subject to a pending Objection shall, prior to filing a response to such pending Objection, attempt to consensually resolve such Objection in good faith by contacting co-counsel to the UCC Settlement Trustee: (i) Riker Danzig LLP, Headquarters Plaza, One Speedwell Avenue, Morristown, NJ 07962, Attn: Joseph L. Schwartz, Esq. (jschwartz@riker.com), Tara J. Schellhorn (tschellhorn@riker.com), and Daniel A. Bloom (dbloom@riker.com); and (ii) Squire Patton Boggs (US) LLP, 2550 M Street NW, Washington, DC 20037, Attn.: Jeffrey N. Rothleder (jeffrey.rothleder@squirepb.com) and Squire Patton Boggs (US) LLP, 1000 Key Tower, 127 Public Square, Cleveland, OH 44114, Attn.: Maura P. McIntyre (maura.mcintyre@squirepb.com) within ten (10) calendar days following the date of the applicable Objection Notice or such other date as the Trustee may agree in writing (email being

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Amended Claim Objection Procedures (as defined herein).

sufficient). Please have your Proof(s) of Claim and any related material available for any such discussions.

2. Parties Required to File a Response. If you are not able to resolve the Objection filed with respect to your Claim(s) as set forth above consensually, you must file a response (each, a “Response”) with the Court in accordance with the following procedures:

3. Response Contents. Each Response must contain the following (at a minimum):

- a. a caption stating the name of the Court, the name of the Debtors, the case number, the title of the Objection to which the Response is directed, and, if applicable, the Proof of Claim number(s) related thereto from the Claims Register;
- b. a concise statement setting forth the reasons why the Court should not grant the Objection with respect to such Claim, including the factual and legal bases upon which the claimant will rely in opposing the Objection;
- c. a copy of any other documentation or other evidence of the Claim, to the extent not already included with the Proof of Claim (if applicable), upon which the claimant will rely in opposing the Objection; *provided, however,* that the claimant need not disclose confidential, proprietary, or otherwise protected information in the Response; *provided further, however,* that the claimant shall disclose to the Trustee all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its Claim, subject to appropriate confidentiality constraints; and
- d. the following contact information for the responding party:
 - i. the name, address, telephone number, and email address of the responding claimant or the claimant’s attorney or designated representative to whom the attorneys for the Trustee should serve a reply to the Response, if any; or
 - ii. the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the Objection on the claimant’s behalf.
- e. For the avoidance of doubt, a Response may also, but is not required to, include a statement that discovery is necessary

to resolve the Objection. The statement needs only to clarify that the affected claimant believes discovery is necessary, but does not need to set forth the discovery requested. If the affected claimant includes such statement in his or her Response, such claimant must serve notice of his or her request in accordance with the below. The scheduled hearing will then be treated as a status conference during which the parties will request that the Court issue a scheduling order to discuss what, if any, discovery is necessary to facilitate dismissal or resolution of the litigation. Such notice must be provided in a separate notice.

4. Filing and Serving the Response. A Response shall be deemed timely only if it is filed with the Court and served on all of the following parties (the “Notice Parties”) so as to be actually received **by or before 4:00 p.m. (prevailing Eastern Time) on the day that is seven (7) calendar days before the Hearing (defined below) on the Objection(s) and Response(s)** (the “Response Deadline”), unless the Trustee consents to an extension in writing:

- a. Reorganized Debtors’ Counsel. Co-counsel to the Reorganized Debtors: (i) Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, Attn.: Ciara Foster (ciara.foster@kirkland.com), Oliver Paré (oliver.pare@kirkland.com), and Jimmy Ryan (jimmy.ryan@kirkland.com) and Kirkland & Ellis LLP, 300 North LaSalle, Chicago, IL 60654, Attn.: Connor Casas (connor.casas@kirkland.com); and (ii) Cole Schotz P.C., Court Plaza North, 25 Main Street, Hackensack, New Jersey 07601, Attn.: Michael D. Sirota, Esq. (msirota@coleschotz.com), Warren A. Usatine, Esq. (WUsatine@coleschotz.com), Ryan T. Jareck, Esq. (RJareck@coleschotz.com), and Felice R. Yudkin, Esq. (FYudkin@coleschotz.com);
- b. Trustee’s Counsel. Co-counsel to the UCC Settlement Trustee: (i) Riker Danzig LLP, Headquarters Plaza, One Speedwell Avenue, Morristown, NJ 07962, Attn: Joseph L. Schwartz (jschwartz@riker.com), Tara J. Schellhorn (tschellhorn@riker.com), and Daniel A. Bloom (dbloom@riker.com); and (ii) Squire Patton Boggs (US) LLP, 2550 M Street NW, Washington, DC 20037, Attn.: Jeffrey N. Rothleder (jeffrey.rothleder@squirepb.com) and Squire Patton Boggs (US) LLP, 1000 Key Tower, 127 Public Square, Cleveland, OH 44114, Attn.: Maura P. McIntyre (maura.mcintyre@squirepb.com); and
- c. U.S. Trustee. Office of the United States Trustee for the District of New Jersey, One Newark Center, Suite 2100, Newark, NJ 07102, Attn.: Fran Steele (Fran.B.Steele@usdoj.gov) and Peter D’Auria (Peter.DAuria@usdoj.gov).

5. Failure to Respond. A Response that is not filed with the Court and served in accordance with the procedures set forth herein on or before the Response Deadline or such other date as agreed with the Trustee, in accordance with the procedures set forth herein, may not be considered at the Hearing before the Court. **Absent reaching an agreement with the Trustee in writing (email being sufficient) resolving the Objection to a Claim, failure to both timely file**

and serve a Response as set forth herein may result in the Court granting the Objection without further notice or hearing. Affected creditors shall be served with such order once it has been entered.

Hearing on the Objection

6. **Date, Time, and Location.** A hearing (the “Hearing”) on the Objection will be held on March 18, 2025 at 10:00 a.m., prevailing Eastern Time, before the Honorable John K. Sherwood, United States Bankruptcy Judge for the District of New Jersey. The Hearing will be conducted virtually using Zoom for Government. To the extent parties wish to present their argument at the Hearing, a request for “Presenter Status” must be submitted to the Court at least one (1) business day prior to the Hearing by emailing Chambers (chambers_of_jks@njb.uscourts.gov) and providing the following information: (i) name of presenter, (ii) email address of presenter, (iii) presenter’s connection to the case, and/or (iv) what party or interest the presenter represents. If the request is approved, the presenter will receive appropriate Zoom credentials and further instructions via email. The Hearing may be adjourned to a subsequent date in these cases in the Court’s or Trustee’s discretion. You must attend the Hearing if you disagree with the Objection and have filed a Response that remains unresolved prior to the Hearing. If such Claims cannot be resolved and a hearing is determined to be necessary, the Trustee shall file with the Court and serve on the affected claimants a notice of the Hearing to the extent the Trustee did not file a notice of Hearing previously.

7. **Reply to a Response.** The Reorganized Debtors or the Trustee shall be permitted to file a reply to any Response no later than one (1) business day before the Hearing with respect to the relevant Objection.

8. **Discovery.** If the Trustee determines that discovery is necessary in advance of a Hearing on an Objection, such party shall serve notice on the affected claimant and its counsel of record that the scheduled Hearing shall be treated as a status conference during which the parties shall request that the Court issue a scheduling order to facilitate dismissal or resolution of the litigation. Such notice may be incorporated into the initial agenda letter for the hearing or may be provided in a separate notice. Unless otherwise agreed between the applicable party seeking discovery and the applicable claimant, the first Hearing on any contested Objection with respect to a particular Claim will not be an evidentiary Hearing, and there is no need for any witnesses to appear at such Hearing unless the Court orders otherwise.

Additional Information

Copies of these procedures, the Order, the Motion, or any other pleadings filed in these chapter 11 cases are available for free online at <https://dm.epiq11.com/WeWork>. Copies of these documents may also be obtained upon written request to Epiq, the Trustee’s Notice and Claims Agent by (i) accessing the Reorganized Debtors’ restructuring website at <https://dm.epiq11.com/WeWork>; (ii) writing to WeWork Inc. Ballot Processing, c/o Epiq Corporate Restructuring, LLC, 10300 SW Allen Blvd., Beaverton, OR 97005; (iii) emailing WeWorkinfo@epiqglobal.com; or (iv) calling the following number: (877) 959-5845 (U.S. /Canada Toll-Free), +1 (503) 852-9067 (International).

Reservation of Rights

9. NOTHING IN ANY NOTICE SHALL BE DEEMED TO CONSTITUTE A WAIVER OF ANY RIGHTS OF THE REORGANIZED DEBTORS, THE TRUSTEE OR ANY OTHER PARTY IN INTEREST TO DISPUTE ANY CLAIMS, ASSERT COUNTERCLAIMS, EXERCISE RIGHTS OF OFFSET OR RECOUPMENT, RAISE DEFENSES, OBJECT TO ANY CLAIMS ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION (UNLESS THE COURT HAS ALLOWED THE CLAIM OR ORDERED OTHERWISE), OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE. AFFECTED PARTIES WILL BE PROVIDED APPROPRIATE NOTICE THEREOF AT SUCH TIME.

[Remainder of the page intentionally left blank]

February 14, 2025
Morristown, New Jersey

RIKER DANZIG LLP

By: /s/ Joseph L. Schwartz

Joseph L. Schwartz, Esq.

Tara J. Schellhorn, Esq.

Daniel A. Bloom, Esq.

Gregory S. Toma, Esq.

Headquarters Plaza, One Speedwell Avenue

Morristown, New Jersey 07962-1981

Telephone: (973) 538-0800

Facsimile: (973) 538-1984

jschwartz@riker.com

tschellhorn@riker.com

dbloom@riker.com

gtoma@riker.com

-and-

SQUIRE PATTON BOGGS (US) LLP

Jeffrey N. Rothleder, Esq. (admitted *pro hac vice*)

2550 M Street NW

Washington, DC 20037

Telephone: (202) 457-6000

Facsimile: (202) 457-6315

jeffrey.rothleder@squirepb.com

Maura P. McIntyre, Esq. (admitted *pro hac vice*)

1000 Key Tower

127 Public Square

Cleveland, OH 44114

Telephone: (216) 479-8715

Facsimile: (216) 479-8780

maura.mcintyre@squirepb.com

*Co-Counsel to Trustee for the WeWork UCC
Settlement Trust Created Under Confirmed Plan*