



Harrison H.D. Breakstone  
Archer & Greiner, P.C.  
1211 Avenue of the Americas  
New York, New York 10036  
212-682-4940  
[www.archerlaw.com](http://www.archerlaw.com)

July 7, 2025

**via Email**

Epiq  
Attn: Kathryn Tran  
777 Third Avenue, 12th Floor  
New York, New York 10017  
Email: [ktran@epiqglobal.com](mailto:ktran@epiqglobal.com)

Re: *In re WeWork Inc.*  
Case No. 23-19865  
United States Bankruptcy Court for the District of New Jersey  
*Securities and Exchange Commission*  
*v. Jonathan Larmore, et al.: ArciTerra Receivership*  
Case No. 23-CV-02470-DLR  
United States District Court for the District of Arizona  
Withdrawal of Claim No. 11087

Dear Ms. Tran:

Our firm represents Allen D. Applbaum as Receiver in the referenced District of Arizona matter pursuant to that certain *Order Appointing Receiver, Freezing Assets and Imposing Litigation Injunction* [ECF No. 154] (the "Order") and *Temporary Restraining Order* [ECF No. 78] (the "TRO").

The United States District Court for the District of Arizona entered the Order and TRO to protect investors and other parties in investment funds and assets owned and/or controlled by one or more of Defendants Jonathan M. Larmore, ArciTerra Companies, LLC, ArciTerra Note Advisors II, LLC, ArciTerra Note Advisors III, LLC, ArciTerra Strategic Retail Advisors, LLC, and Cole Capital Funds, LLC as well as other entities identified in the Order (collectively the "Receivership Entities").

Having become aware of a nexus between Mr. Larmore and WeWork, on March 12, 2024, the Receiver filed a claim in an unliquidated amount on account of any and all claims belonging to the Receivership Entities, Claim No 11087 (the "Claim"). A copy of the Claim is enclosed. The Claim was designated Claim No. 11087. On December 23, 2024, the UCC Settlement Trust Trustee filed the *WeWork UCC Settlement Trust Trustee's First Omnibus Objection to Certain General Unsecured Claims* objecting to the Claim (Docket No. 2374).

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Since the filing of the Claim, and the objection thereto, the Receiver continued to conduct diligence to determine whether the ArciTerra Receivership Entities had cognizable claims against the WeWork estates. The Receiver has determined to withdraw the Claim. Therefore, the Receiver requests that Epiq record the Claim as withdrawn.

Please confirm.

Sincerely,

A handwritten signature in black ink, appearing to read 'HDB', is written over a horizontal line.

HARRISON H.D. BREAKSTONE

Encl.

*cc: via email only (with enclosure)*

Daniel Bloom, Riker Danzig LLP, Counsel to Official Committee of Unsecured Creditors  
Allen D. Applbaum, Receiver  
Abby Barasch, StoneTurn Group LLC

United States Bankruptcy Court for the District of New Jersey

**Name of Debtor:** WeWork Inc.

**Case Number:** 23-19865

**For Court Use Only**

Claim Number: 0000011087

File Date: 03/12/2024 16:27:40

## Proof of Claim (Official Form 410)

**Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. With the exception of 503(b)(9), do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.**

**Filers must leave out or redact** information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

**Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.**

04/22

### Part 1: Identify the Claim

**1. Who is the current creditor?**

Name of the current creditor (the person or entity to be paid for this claim): Allen D. Applebaum, ArciTerra Receiver

Other names the creditor used with the debtor: \_\_\_\_\_

**2. Has this claim been acquired from someone else?** ☒ No ☐ Yes. From whom? \_\_\_\_\_

**3. Where should notices and payments to the creditor be sent?** Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

**Where should notices to the creditor be sent?**

Name Allen D. Applebaum, ArciTerra Receiver

Address Archer & Greiner, P.C.

Attn: Allen G. Kadish

1211 Avenue of the Americas, Suite 2750

City New York

State NY ZIP Code 10036

Country (if International): United States

Phone: 2126824940

Email: akadish@archerlaw.com

**Where should payments to the creditor be sent? (if different)**

Name \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_

Country (if International): \_\_\_\_\_

Phone: \_\_\_\_\_

Email: \_\_\_\_\_

**4. Does this claim amend one already filed?**

☒ No

☐ Yes.

Claim number on court claims register (if known) \_\_\_\_\_

Filed on \_\_\_\_\_  
MM / DD / YYYY

**5. Do you know if anyone else has filed a proof of claim for this claim?**

☒ No

☐ Yes.

Who made the earlier filing?  
\_\_\_\_\_

<b>6. Do you have any number you use to identify the debtor?</b>  <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor:  _____	<b>7. How much is the claim?</b> undetermined \$ _____  <b>Does this amount include interest or other charges?</b>  <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).	<b>8. What is the basis of the claim?</b>  Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.  Other Basis _____  See Attached.
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<b>9. Is all or part of the claim secured?</b>  <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property. <b>Nature of property:</b>  <input type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (official Form 410-A) with this <i>Proof of Claim</i> .  <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____  <b>Basis for perfection:</b>  _____ Attach redacted copies of documents, if any, that show evidence of perfection of security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) <b>Value of property:</b> \$ _____ <b>Amount of the claim that is secured:</b> \$ _____ <b>Amount of the claim that is unsecured:</b> \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.) <b>Amount necessary to cure any default as of the date of the petition:</b> \$ _____ <b>Annual Interest Rate</b> (when case was filed) _____% <input type="checkbox"/> Fixed <input type="checkbox"/> Variable	<b>10. Is this claim based on a lease?</b>  <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. <b>Amount necessary to cure any default as of the date of petition.</b> \$ _____	<b>11. Is this claim subject to a right of setoff?</b>  <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____
	<b>12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?</b>  <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. <i>Check one:</i>  <input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). <input type="checkbox"/> Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). <input type="checkbox"/> Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). <input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). <input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). <input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507 (a) (_____) that applies. <small>* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.</small>	

**13. Does this claim qualify as an Administrative Expense under 11 U.S.C. § 503(b)(9)?**  
  
☒ No  
☐ Yes. **Amount that qualifies as an Administrative Expense under 11 U.S.C. § 503(b)(9):** \$ \_\_\_\_\_

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Part 3: Sign Below	Page 5 of 5
<p><b>The person completing this proof of claim must sign and date it. FRBP 9011(b).</b></p> <p>If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.</p> <p><b>A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.</b></p>	<p>Check the appropriate box:</p> <p><input type="checkbox"/> I am the creditor.</p> <p><input checked="" type="checkbox"/> I am the creditor's attorney or authorized agent.</p> <p><input type="checkbox"/> I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.</p> <p><input type="checkbox"/> I am a guarantor, surety, endorser, or other co-debtor. Bankruptcy Rule 3005.</p> <p>I understand that an authorized signature on this <i>Proof of Claim</i> serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.</p> <p>I have examined the information in this <i>Proof of Claim</i> and have a reasonable belief that the information is true and correct.</p> <p>I declare under penalty of perjury that the foregoing is true and correct.</p> <p><u>Allen D. Applbaum</u> 03/12/2024 16:27:40</p> <p>Signature Date</p> <p><b>Provide the name and contact information of the person completing and signing this claim:</b></p> <p>Name <u>Allen D. Applbaum, ArciTerra Receiver</u></p> <p>Address <u>c/o StoneTurn Group LLP</u></p> <p><u>17 State Street 2nd Floor</u></p> <p><u>Attn: Receiver, AZ. Case #: CV-23-02470</u></p> <p>City <u>New York</u></p> <p>State <u>NY</u> Zip <u>10004</u></p> <p>Country (in international) <u>USA</u></p> <p>Phone <u>(212)4303400</u></p> <p>Email <u>receiver@arciterrareceivership.com</u></p>