

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Knotel, Inc., *et al.*,

Debtors.¹

Chapter 11

Case No. 21-10146 (MFW)

Jointly Administered

Re: D.I. 949

**ORDER (I) ESTABLISHING CERTAIN BAR DATES FOR FILING PREPETITION
CLAIMS AND ADMINISTRATIVE EXPENSE CLAIMS, AND (II) GRANTING
RELATED RELIEF, INCLUDING NOTICE AND FILING PROCEDURES**

Upon the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (the “Debtors”), for entry of an order (this “Order”), pursuant to sections 501, 502 and 503 of the Bankruptcy Code, Bankruptcy Rules 2002, 3002 and 3003, and Local Rules 2002-1(e) and 3003-1: (i) establishing certain bar dates for filing prepetition claims and administrative expense claims in these chapter 11 cases and (ii) granting related relief, including approving the form and manner of notice thereof; and notice of this Motion having been due and sufficient under the circumstances; and after any hearing and upon the record in these chapter 11 cases; and after due deliberation; and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED**, as set forth herein.

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://www.omniagentsolutions.com/knotel> or, alternatively, via the Bankruptcy Court at <https://ecf.deb.uscourts.gov/cgi-bin/login.pl> with a Public Access to Court Electronic Records (“PACER”) account, which may be obtained at <https://pacer.uscourts.gov>. The location of Debtor Knotel, Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is 5-9 Union Square West, New York, NY 10003.

² Capitalized terms not defined herein are defined in the Motion.

2. Unless otherwise provided herein, the following Bar Dates are hereby established in these chapter 11 cases:

- a. 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days from service of the Bar Date Notice as the deadline (the “General Bar Date”) for each person or entity, other than a governmental unit, to file a proof of claim in respect of any prepetition claim against any of the Debtors, including, without limitation, any secured claim, unsecured claim, priority claim, or claim asserted under section 503(b)(9) of the Bankruptcy Code for goods delivered and received by any of the Debtors within twenty (20) days of the Petition Date;
- b. 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days from service of the Bar Date Notice as the deadline (the “Administrative Claim Bar Date”) for each person or entity to file a request to allow any unpaid administrative expense claim (each, an “Administrative Claim”) against any of the Debtors arising on or after the Petition Date and through and including the date of the service of the Bar Date Notice, unless otherwise provided in this Order;
- c. July 30, 2021, as the deadline (the “Government Bar Date”) by which a governmental unit must file a proof of claim in respect of a prepetition claim against any of the Debtors;
- d. the later of (i) the General Bar Date or the Government Bar Date (if applicable) and (ii) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days following service of an order approving rejection of an executory contract or unexpired lease of the Debtors as the deadline (the “Rejection Bar Date”) by which an entity asserting a claim for damages against any of the Debtors arising from such rejection must file a proof of claim on account of such damages;
- e. the later of (i) the General Bar Date or the Government Bar Date (if applicable) and (ii) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days following service of notice of an amendment to the Debtors’ Schedules as the deadline (the “Amended Schedule Bar Date”) for an entity whose claim is affected by such amendment to file, amend, or supplement a proof of claim with respect to such claim.

3. The Claim Form, substantially in the form attached hereto as **Exhibit 1**, the Bar Date Notice, substantially in the form attached hereto as **Exhibit 2**, and the form of publication

notice of the Bar Dates, substantially in the form attached hereto as **Exhibit 3**, are each hereby approved.

Who Must File a Proof of Claim

4. Except as otherwise set forth herein, the following persons or entities asserting claims against the Debtors arising, or deemed to arise, before the Petition Date are required to file proofs of claim by the applicable Bar Date (regardless of whether such claims are secured or unsecured, priority or nonpriority, or otherwise) if such persons or entities wish to be treated as creditors with respect to such claims for the purposes of voting and distribution in these cases:

- a. any person or entity whose claim is not listed on the applicable Debtor's Schedules;
- b. any person or entity whose claim is listed on the applicable Debtor's Schedules as contingent, unliquidated or disputed;
- c. any person or entity whose claim is improperly classified on the applicable Debtor's Schedules or is listed in an incorrect amount and who desires to have its claim allowed in a different classification or amount than identified in the applicable Schedules;
- d. any person or entity whose claim is identified on the incorrect Debtor's Schedules, or not identified on the Schedules of all Debtors against whom the entity desires to, and has a basis to, assert such claim;
- e. any person or entity who believes that its claim against a Debtor is or may be entitled to priority under section 503(b)(9) of the Bankruptcy Code for goods delivered and received by any of the Debtors within twenty (20) days of the Petition Date;
- f. any person or entity who asserts a claim arising from the rejection of an executory contract or unexpired lease of a Debtor and has not previously filed any such claim;
- g. any person or entity who asserts a claim against a Debtor arising from or relating to the purchase or sale of any security of the Debtors, including, without limitation, any equity security; and

- h. any person or entity who asserts a claim arising from or relating to pending or threatened litigation against a Debtor.

Who is Not Required to File a Proof of Claim

5. The following persons or entities holding prepetition claims against the Debtors shall not be required to file proofs of claim:

- a. any person or entity whose claim is listed on the Schedules, if (i) the claim is not listed as contingent, unliquidated or disputed, (ii) the person or entity does not disagree with the amount, nature or priority of the claim as identified on the Schedules, and (iii) the person or entity does not dispute that the claim is the obligation of the specific Debtor or Debtors on whose Schedules the claim is identified;
- b. any person or entity who has already filed with Omni or with the Clerk of Court a signed proof of claim against the applicable Debtor(s) utilizing Official Form B410 or a claim form that substantially conforms to such official form, including by providing all of the information required by such form and the procedures set forth herein;
- c. any person or entity whose claim has been allowed by order of the Court entered on or before the applicable Bar Date;
- d. any person or entity whose claim has been paid in full in accordance with an order of the Court entered on or before the applicable Bar Date;
- e. any person or entity whose claim is based solely on owning an equity security in the Debtors;
- f. any employee of the Debtors who was employed at any time on or after the Petition Date and whose prepetition salary, wages, benefits or other remuneration have been paid pursuant to Court order; provided, however, that all other claims of employees arising before the Petition Date must be filed by the applicable Bar Date;
- g. any director, officer or employee of the Debtors who served in such capacity at any time after the Petition Date for claims based on indemnification, contribution or reimbursement;
- h. any Debtor having a claim against another Debtor;
- i. any contract or lease counterparty whose contract or lease has been assumed or assumed and assigned by the Debtors; and

- j. Digiatech, LLC, as the Debtors' pre and postpetition secured lender, on account of any claim arising under the DIP Documents or the Prepetition Secured Credit Documents³ (collectively, the "Loan Documents"). For the avoidance of doubt, Digiatech, LLC, and Newmark Partners, L.P., and their respective parents, subsidiaries, and affiliates, have waived any deficiency claim against the Debtors' estates pursuant to the Committee Settlement Term Sheet.

Requirements and Procedures for Filing a Proof of Claim

6. The following procedures and requirements with respect to preparing and filing proofs of claim are hereby established:

- a. proofs of claim must be submitted on the Claim Form or Official Form B410, or substantially conform to such official form;
- b. proofs of claim must be written in the English language, denominated in U.S. dollars, specify the name and case number of the Debtor against whom the claim is asserted, set forth the legal and factual bases for the claim, include supporting documentation or an explanation for why supporting documentation is not available, and be signed under penalty of perjury by the claimant or the claimant's attorney or authorized agent; and
- c. if the claimant asserts a claim or claims against more than one Debtor, the claimant must file a separate proof of claim against each applicable Debtor.⁴
- d. Electronic proofs of claim. A proof of claim may be filed electronically at <https://omniagentsolutions.com/knotel-claims> using the interface available after clicking the link entitled "Submit a Proof of Claim". A claim must be submitted **so as to be actually received** on or before the applicable Bar Date.

³ The capitalized terms used in this subparagraph (j) are used as defined in the *Final Order (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Grant Senior Secured Liens and Superpriority Administrative Expense Claims, and (C) Utilize Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Lender; (III) Modifying the Automatic Stay; and (IV) Granting Related Relief* (D.I. 330) (the "Final DIP Order").

⁴ The Debtors reserve the right, in their sole discretion and with prior written approval of the Debtors in each instance, to permit creditors to submit a single proof of claim against multiple Debtors.

- e. Hardcopy proofs of claim. An original, signed copy of the proof of claim must be sent **so as to be actually received** on or before the applicable Bar Date as follows:

Knotel, Inc.
c/o Omni Agent Solutions, Claims Processing
5955 De Soto Ave, Suite 100
Woodland Hills, CA 91367

- f. Other methods not accepted. Proofs of claim sent by means other than as described above, including by means of email or fax, will not be accepted.

7. The Debtors, with assistance from Omni, will provide each creditor listed on the Debtors' Schedules with a personalized Claim Form indicating how the creditor's claim is reflected on the Schedules, including: (i) the identity of the Debtor against which the creditor's claim is scheduled; (ii) the amount of the scheduled claim, if any; (iii) whether the claim is contingent, unliquidated, or disputed; and (iv) whether the claim is listed as secured, unsecured priority, or unsecured nonpriority.

Who Must File a Request for Allowance of an Administrative Claim

8. Except as otherwise provided herein, any person or entity who holds an unpaid Administrative Claim against any of the Debtors arising on or after the Petition Date and through and including the date of the service of the Bar Date Notice shall be required to file a request for allowance of such Administrative Claim by the Administrative Claim Bar Date.

Who is Not Required to File a Request for Allowance of an Administrative Claim

9. The following persons or entities shall not be required to file a request for allowance of an Administrative Claim by the Administrative Claim Bar Date:

- a. any person or entity whose administrative expense arising on or after the Petition Date and through and including the date of the service of the Bar Date Notice has been paid in full on or prior to the Administrative Claim Bar Date;

- b. any person or entity whose administrative expense arising on or after the Petition Date and through and including the date of the service of the Bar Date Notice has been allowed by Court order entered on or prior to the Administrative Claim Bar Date;
- c. any person or entity whose administrative expense arises after service of the Bar Date Notice;
- d. any professional retained by the Debtors or the Committee (including any member of the Committee for reimbursement of expenses incurred in connection with the member's service on the Committee) pursuant to Court order for fees or expenses incurred under such retention order;
- e. any claims for fees payable to the Clerk of the Court;
- f. any claims for fees payable to the Office of the United States Trustee under 28 U.S.C. § 1930(a)(c); and
- g. Digiatech, LLC, as the Debtors' pre and postpetition secured lender, on account of any claim arising under the Loan Documents. For the avoidance of doubt, Digiatech, LLC, and Newmark Partners, L.P., and their respective parents, subsidiaries, and affiliates, have waived any deficiency claim against the Debtors' estates pursuant to the Committee Settlement Term Sheet.

Requirements and Procedures for Filing a Request for Allowance of an Administrative Claim

10. The following requirements and procedures for filing a request for allowance of an Administrative Claim are hereby established:

- a. any request for allowance of an Administrative Claim must contain and be filed under the case caption and on the docket of these jointly administered cases either by electronic filing through CM/ECF by the Administrative Claim Bar Date, or, if filed other than by CM/ECF, be filed sufficiently in advance so as to actually appear on the Court's docket by the Administrative Claim Bar Date; and
- b. any request for allowance of an Administrative Claim must be written in the English language, denominated in U.S. dollars, specify the name and case number of the Debtor against whom the claim is asserted, set forth the legal and factual bases for the claim, include supporting documentation or an explanation for why supporting documentation is not available, and be signed under

penalty of perjury by the claimant or the claimant's attorney or authorized agent.

Consequences of Failure to File a Proof of Claim or Administrative Claim

11. Pursuant to Bankruptcy Rule 3003(c)(2), any holder of a prepetition claim or an Administrative Claim who is required to file but fails to file such claim in accordance with the foregoing requirements and procedures before the applicable Bar Date shall not be treated as a creditor with respect to such claim for the purposes of voting and distribution in these cases.

Actual Notice of the Bar Dates to Known Potential Creditors

12. Pursuant to Bankruptcy Rule 2002(a)(7), (f), and (p), the Debtors shall provide the Bar Date Notice Package to the following potential creditors and other parties in interest, wherever located:

- a. the Office of the U.S. Trustee;
- b. counsel to the Committee;
- c. all known creditors and other known holders of potential claims against the Debtors' or their estates;
- d. all parties who have filed claims in these cases, including administrative expense claims, as of the date of entry of the Bar Date Order;
- e. all counterparties to executory contracts and unexpired leases listed on the Schedules at the addresses stated therein or as updated by a counterparty pursuant to the terms of the contract or lease;
- f. all parties who have filed a request for notice in these cases pursuant to Bankruptcy Rule 2002 as of the date of entry of the Bar Date Order;
- g. all parties who have otherwise filed a document in these cases and are identified on the Court's electronic docket as of the date of entry of the Bar Date Order;
- h. all current employees of the Debtors and former employees of the Debtors who left the Debtors' employ within three years prior to the Petition Date or at any time following the Petition Date through the date of entry of the Bar Date Order;

- i. all taxing authorities for jurisdictions in which the Debtors do business or did business within three years prior to the Petition Date;
- j. all government agencies that regulate the Debtors' business;
- k. the office of the attorney general for each state in which the any Debtor is incorporated or maintained or conducted business within three years prior to the Petition Date;
- l. the SEC;
- m. all known lienholders;
- n. all parties to litigation pending or threatened against the Debtors as of the date of entry of the Bar Date Order;
- o. all providers of utility services to the Debtors, including past providers who provided service within three years of the Petition Date;
- p. the Debtors' current insurance providers; the Debtors' past insurance providers under whose policies open claims remain pending; and the Debtors' past insurance providers who provided coverage within three years before the Petition Date, regardless of whether a claim is currently pending in respect of such coverage;
- q. the Debtors' ordinary course professionals;
- r. the Debtors' banks; and
- s. all parties included on the creditor matrix filed in these chapter 11 cases.

Publication Notice of the Bar Dates for Unknown Potential Creditors

13. The Debtors shall publish the Bar Date Notice, in substantially the form attached hereto as **Exhibit 3**, in the national edition of *The New York Times*. The Debtors shall publish such notice at least twenty-one (21) days prior to the General Bar Date.

14. The publication notice provided pursuant to this Order is hereby determined to be valid, constitutional and proper notice of the Bar Date to bind all Unknown Potential Creditors of the Debtors.

Additional Relief

15. The Debtors and Omni are authorized and empowered to take such steps and perform such actions as may be necessary to implement and effectuate the terms of this Order, including without limitation, paying of costs incurred in connection with noticing the Bar Dates.

16. Notification of the relief granted by this Order as provided herein is fair and reasonable and will provide good, sufficient and proper notice to all creditors of their rights and obligations in connection with claims they may have against the Debtors in these cases.

17. Nothing in this Order shall prejudice the right of the Debtors or any other party in interest to dispute or assert offsets or defense to any claim reflected in the Schedules or otherwise.

18. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

19. The Debtors may make corrections, additions or deletions to the Bar Date Notice Package and the publication notice as appropriate, including to remove stale or non-pertinent information.

20. This Court shall retain jurisdiction over all matters arising out of or related to the Motion and this Order.

Dated: April 1st, 2021
Wilmington, Delaware

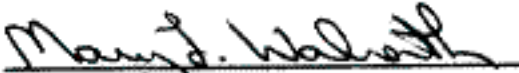

MARY F. WALRATH
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1

CLAIM FORM

Fill in the information to identify the case (Select only one Debtor per form):

<input type="checkbox"/> Knotel, Inc. - Case No. 21-10146	<input type="checkbox"/> 195 Broadway NYC LLC - Case No. 21-10182	<input type="checkbox"/> 44 Thomson PI BOS LLC - Case No. 21-10219
<input type="checkbox"/> 100 Bush St SF LLC - Case No. 21-10147	<input type="checkbox"/> 2 Liberty Sq BOS LLC - Case No. 21-10183	<input type="checkbox"/> 447 Broadway NYC LLC - Case No. 21-10220
<input type="checkbox"/> 101 Fifth Ave NYC LLC - Case No. 21-10148	<input type="checkbox"/> 22 W 21 ST NYC LLC - Case No. 21-10184	<input type="checkbox"/> 45 W 45 ST NYC LLC - Case No. 21-10221
<input type="checkbox"/> 101 Montgomery St SF LLC - Case No. 21-10149	<input type="checkbox"/> 2228 Cottner LA LLC - Case No. 21-10185	<input type="checkbox"/> 4501 Glencoe Blvd LA LLC - Case No. 21-10222
<input type="checkbox"/> 10301 Jefferson Blvd LA LLC - Case No. 21-10150	<input type="checkbox"/> 23 W 20th NYC LLC - Case No. 21-10186	<input type="checkbox"/> 455 Market St SF LLC - Case No. 21-10223
<input type="checkbox"/> 110 W 32nd NYC LLC - Case No. 21-10151	<input type="checkbox"/> 239 Causeway St Boston LLC - Case No. 21-10187	<input type="checkbox"/> 456 Montgomery St SF LLC - Case No. 21-10224
<input type="checkbox"/> 1100 Glendon LA LLC - Case No. 21-10152	<input type="checkbox"/> 240 W 35th NYC LLC - Case No. 21-10188	<input type="checkbox"/> 465 California St SF LLC - Case No. 21-10225
<input type="checkbox"/> 1120 20th St DC LLC - Case No. 21-10153	<input type="checkbox"/> 240 W 40 St NYC LLC - Case No. 21-10189	<input type="checkbox"/> 5 Bryant Park NYC LLC - Case No. 21-10226
<input type="checkbox"/> 116 W 32nd NYC LLC - Case No. 21-10154	<input type="checkbox"/> 250 Montgomery St LLC - Case No. 21-10190	<input type="checkbox"/> 50 Osgood PI SF LLC - Case No. 21-10227
<input type="checkbox"/> 12 E 33 St NYC LLC - Case No. 21-10155	<input type="checkbox"/> 259 W 30TH NYC LLC - Case No. 21-10191	<input type="checkbox"/> 505 Howard SF St LLC - Case No. 21-10228
<input type="checkbox"/> 12121 Bluff Creek LA LLC - Case No. 21-10156	<input type="checkbox"/> 26 W 17th St NYC LLC - Case No. 21-10192	<input type="checkbox"/> 545 5th Ave NYC LLC - Case No. 21-10229
<input type="checkbox"/> 12211 Washington LA LLC - Case No. 21-10157	<input type="checkbox"/> 260 W 39th NYC LLC - Case No. 21-10193	<input type="checkbox"/> 555 Montgomery St SF LLC - Case No. 21-10230
<input type="checkbox"/> 125 Fifth Ave NYC LLC - Case No. 21-10158	<input type="checkbox"/> 275 Battery St SF LLC - Case No. 21-10194	<input type="checkbox"/> 565 Commercial St SF LLC - Case No. 21-10231
<input type="checkbox"/> 1250 Eye St DC LLC - Case No. 21-10159	<input type="checkbox"/> 28 W 25 NYC LLC - Case No. 21-10195	<input type="checkbox"/> 580 8th Ave NYC LLC - Case No. 21-10232
<input type="checkbox"/> 12555 West Jefferson Way LA LLC - Case No. 21-10160	<input type="checkbox"/> 29 W 35th St NYC LLC - Case No. 21-10196	<input type="checkbox"/> 590 Fifth Ave NYC LLC - Case No. 21-10233
<input type="checkbox"/> 126 Post St SF LLC - Case No. 21-10161	<input type="checkbox"/> 295 Madison NYC LLC - Case No. 21-10197	<input type="checkbox"/> 597 Fifth Ave NYC LLC - Case No. 21-10234
<input type="checkbox"/> 129 W 29th NYC LLC - Case No. 21-10162	<input type="checkbox"/> 30 W 21 St NYC LLC - Case No. 21-10198	<input type="checkbox"/> 6 W 28th NYC LLC - Case No. 21-10235
<input type="checkbox"/> 131 Rodeo 102 LA LLC - Case No. 21-10163	<input type="checkbox"/> 300 Broadway St SF LLC - Case No. 21-10199	<input type="checkbox"/> 60 Madison NYC LLC - Case No. 21-10236
<input type="checkbox"/> 131 Rodeo 250 LA LLC - Case No. 21-10164	<input type="checkbox"/> 300 Montgomery St SF LLC - Case No. 21-10200	<input type="checkbox"/> 600 Corporate Pointe LA LLC - Case No. 21-10237
<input type="checkbox"/> 13160 Mindanao Way LA LLC - Case No. 21-10165	<input type="checkbox"/> 301 Brannan St SF LLC - Case No. 21-10201	<input type="checkbox"/> 649 Mission St SF LLC - Case No. 21-10238
<input type="checkbox"/> 1317 5th St LA LLC - Case No. 21-10166	<input type="checkbox"/> 303 Second St SF LLC - Case No. 21-10202	<input type="checkbox"/> 650 Fifth Ave NYC LLC - Case No. 21-10239
<input type="checkbox"/> 1330 Conn Ave DC LLC - Case No. 21-10167	<input type="checkbox"/> 3137 S La Cienega Blvd LA LLC - Case No.21-10203	<input type="checkbox"/> 71 Stevenson St SF LLC - Case No. 21-10240
<input type="checkbox"/> 1407 Broadway NYC LLC - Case No. 21-10168	<input type="checkbox"/> 320 Lincoln LA LLC - Case No. 21-10204	<input type="checkbox"/> 750 HARRISON ST SF LLC - Case No. 21-10241
<input type="checkbox"/> 142 Berkeley St BOS LLC - Case No. 21-10169	<input type="checkbox"/> 3309 La Cienega Place LA LLC - Case No. 21-10205	<input type="checkbox"/> 818 Mission St SF LLC - Case No. 21-10242
<input type="checkbox"/> 1444 Market St SF LLC - Case No. 21-10170	<input type="checkbox"/> 333 Broadway SF Tenant LLC - Case No. 21-10206	<input type="checkbox"/> 8590 National Blvd LA LLC - Case No. 21-10243
<input type="checkbox"/> 146 Geary St SF LLC - Case No. 21-10171	<input type="checkbox"/> 350 Sansome St SF LLC - Case No. 21-10207	<input type="checkbox"/> 8690 National Blvd LA LLC - Case No. 21-10244
<input type="checkbox"/> 152 W 25 NYC LLC - Case No. 21-10172	<input type="checkbox"/> 3535 Hayden Ave LA LLC - Case No. 21-10208	<input type="checkbox"/> 875 6th Ave NYC LLC - Case No. 21-10245
<input type="checkbox"/> 1550 Bryant St SF LLC - Case No. 21-10173	<input type="checkbox"/> 360 Madison NYC LLC - Case No. 21-10209	<input type="checkbox"/> 88 Kearny St SF LLC - Case No. 21-10246
<input type="checkbox"/> 1556 20th LA LLC - Case No. 21-10174	<input type="checkbox"/> 369 Lexington Ave NYC LLC - Case No. 21-10210	<input type="checkbox"/> 901 Market St SF LLC - Case No. 21-10247
<input type="checkbox"/> 16 W 36 St NYC LLC - Case No. 21-10175	<input type="checkbox"/> 390 Broadway NYC LLC - Case No. 21-10211	<input type="checkbox"/> 909 E Street DC LLC - Case No. 21-10248
<input type="checkbox"/> 1625 Oly Blvd LA LLC - Case No. 21-10176	<input type="checkbox"/> 40 Broad St BOS LLC - Case No. 21-10212	<input type="checkbox"/> 909 Ocean Front Walk LA LLC - Case No. 21-10249
<input type="checkbox"/> 1640 Sepulveda LA LLC - Case No. 21-10177	<input type="checkbox"/> 400 Sutter St SF LLC - Case No. 21-10213	<input type="checkbox"/> 91 Fifth Ave NYC LLC - Case No. 21-10250
<input type="checkbox"/> 166 Geary St SF LLC - Case No. 21-10178	<input type="checkbox"/> 405 E 4th Avenue SM LLC - Case No. 21-10214	<input type="checkbox"/> Bush 225 SF LLC - Case No. 21-10251
<input type="checkbox"/> 1720 Eye St DC LLC - Case No. 21-10179	<input type="checkbox"/> 405 Howard Street SF LLC - Case No. 21-10215	<input type="checkbox"/> Cortlandt White NYC LLC - Case No. 21-10252
<input type="checkbox"/> 1725 Montgomery St SF LLC - Case No. 21-10180	<input type="checkbox"/> 429 Santa Monica Blvd LA LLC - Case No. 21-10216	<input type="checkbox"/> Kkoin, LLC - Case No. 21-10253
<input type="checkbox"/> 19 W 44th NYC LLC - Case No. 21-10181	<input type="checkbox"/> 42Floors LLC - Case No. 21-10217	<input type="checkbox"/> Knotel 1 Whitehall LLC - Case No. 21-10254
	<input type="checkbox"/> 44 E 32nd Street NYC LLC - Case No. 21-10218	<input type="checkbox"/> Knotel 102 Madison LLC - Case No. 21-10255

Fill in the information to identify the case (Select only one Debtor per form):

<input type="checkbox"/> Knotel 105 Madison LLC - Case No. 21-10256	<input type="checkbox"/> Knotel 30 West 26th LLC - Case No. 21-10293	<input type="checkbox"/> Knotel 598 Broadway LLC - Case No. 21-10330
<input type="checkbox"/> Knotel 109 Stevenson LLC - Case No. 21-10257	<input type="checkbox"/> Knotel 307 Fifth LLC - Case No. 21-10294	<input type="checkbox"/> Knotel 6 W 48th St LLC - Case No. 21-10331
<input type="checkbox"/> Knotel 11 E 44th LLC - Case No. 21-10258	<input type="checkbox"/> Knotel 31 W 27th LLC - Case No. 21-10295	<input type="checkbox"/> Knotel 600 Townsend LLC - Case No. 21-10332
<input type="checkbox"/> Knotel 110 Greene LLC - Case No. 21-10259	<input type="checkbox"/> Knotel 321 11th LLC - Case No. 21-10296	<input type="checkbox"/> Knotel 61 Broadway LLC - Case No. 21-10333
<input type="checkbox"/> Knotel 110 William LLC - Case No. 21-10260	<input type="checkbox"/> Knotel 340 Brannan LLC - Case No. 21-10297	<input type="checkbox"/> Knotel 611 Mission LLC - Case No. 21-10334
<input type="checkbox"/> Knotel 114 W 26th LLC - Case No. 21-10261	<input type="checkbox"/> Knotel 36 W 14th LLC - Case No. 21-10298	<input type="checkbox"/> Knotel 615 Sacramento LLC - Case No. 21-10335
<input type="checkbox"/> Knotel 12 W 21st St LLC - Case No. 21-10262	<input type="checkbox"/> Knotel 360 Pas LLC - Case No. 21-10299	<input type="checkbox"/> Knotel 625 2nd LLC - Case No. 21-10336
<input type="checkbox"/> Knotel 12 W 27th St LLC - Case No. 21-10263	<input type="checkbox"/> Knotel 37 W 17th LLC - Case No. 21-10300	<input type="checkbox"/> Knotel 655 Madison LLC - Case No. 21-10337
<input type="checkbox"/> Knotel 121 2nd Street LLC - Case No. 21-10264	<input type="checkbox"/> Knotel 373 Pas LLC - Case No. 21-10301	<input type="checkbox"/> Knotel 695 AOA LLC - Case No. 21-10338
<input type="checkbox"/> Knotel 147 W 24th LLC - Case No. 21-10265	<input type="checkbox"/> Knotel 38 E 29th LLC - Case No. 21-10302	<input type="checkbox"/> Knotel 701 Sutter LLC - Case No. 21-10339
<input type="checkbox"/> Knotel 148 Lafayette LLC - Case No. 21-10266	<input type="checkbox"/> Knotel 399 Lafayette LLC - Case No. 21-10303	<input type="checkbox"/> Knotel 72 Madison LLC - Case No. 21-10340
<input type="checkbox"/> Knotel 150 Post LLC - Case No. 21-10267	<input type="checkbox"/> Knotel 40 EX LLC - Case No. 21-10304	<input type="checkbox"/> Knotel 785 Market LLC - Case No. 21-10341
<input type="checkbox"/> Knotel 1500 Broadway LLC - Case No. 21-10268	<input type="checkbox"/> Knotel 40 Wooster LLC - Case No. 21-10305	<input type="checkbox"/> Knotel 80 Eighth Ave LLC - Case No. 21-10342
<input type="checkbox"/> Knotel 155 Fifth Ave LLC - Case No. 21-10269	<input type="checkbox"/> Knotel 400 Madison LLC - Case No. 21-10306	<input type="checkbox"/> Knotel 814 Mission LLC - Case No. 21-10343
<input type="checkbox"/> Knotel 156 Fifth, LLC - Case No. 21-10270	<input type="checkbox"/> Knotel 41 USW LLC - Case No. 21-10307	<input type="checkbox"/> Knotel 88 Stevenson LLC - Case No. 21-10344
<input type="checkbox"/> Knotel 16 W 22nd LLC - Case No. 21-10271	<input type="checkbox"/> Knotel 41 W 25 LLC - Case No. 21-10308	<input type="checkbox"/> Knotel 90 John LLC - Case No. 21-10345
<input type="checkbox"/> Knotel 160 Pine LLC - Case No. 21-10272	<input type="checkbox"/> Knotel 417 Montgomery LLC - Case No. 21-10309	<input type="checkbox"/> Knotel 900 Broadway LLC - Case No. 21-10346
<input type="checkbox"/> Knotel 17 W 20th LLC - Case No. 21-10273	<input type="checkbox"/> Knotel 419 PAS LLC - Case No. 21-10310	<input type="checkbox"/> Knotel 972 Mission LLC - Case No. 21-10347
<input type="checkbox"/> Knotel 180 Howard LLC - Case No. 21-10274	<input type="checkbox"/> Knotel 43 W 24th LLC - Case No. 21-10311	<input type="checkbox"/> Knotel Battery LLC - Case No. 21-10348
<input type="checkbox"/> Knotel 200 W 41st LLC - Case No. 21-10275	<input type="checkbox"/> Knotel 443 PAS LLC - Case No. 21-10312	<input type="checkbox"/> Knotel Blockchain Services LLC - Case No. 21-10349
<input type="checkbox"/> Knotel 2080 Addison LLC - Case No. 21-10276	<input type="checkbox"/> Knotel 475 Park LLC - Case No. 21-10313	<input type="checkbox"/> Knotel Canada, Inc. - Case No. 21-10540
<input type="checkbox"/> Knotel 211 East 43 LLC - Case No. 21-10277	<input type="checkbox"/> Knotel 49 Drumm LLC - Case No. 21-10314	<input type="checkbox"/> Knotel Flowerpot LLC - Case No. 21-10350
<input type="checkbox"/> Knotel 213 W 35th St LLC - Case No. 21-10278	<input type="checkbox"/> Knotel 5 Hanover LLC - Case No. 21-10315	<input type="checkbox"/> Knotel Geometry LLC - Case No. 21-10351
<input type="checkbox"/> Knotel 220 W 19th St LLC - Case No. 21-10279	<input type="checkbox"/> Knotel 521 Broadway LLC - Case No. 21-10317	<input type="checkbox"/> Knotel Platform 2017 LLC - Case No. 21-10352
<input type="checkbox"/> Knotel 221 Pine LLC - Case No. 21-10280	<input type="checkbox"/> Knotel 530 Broadway LLC - Case No. 21-10318	<input type="checkbox"/> Knotel President LLC - Case No. 21-10353
<input type="checkbox"/> Knotel 224 W 30th LLC - Case No. 21-10281	<input type="checkbox"/> Knotel 530 Seventh Avenue LLC - Case No.21-10319	<input type="checkbox"/> Knotel Properties LLC - Case No. 21-10354
<input type="checkbox"/> Knotel 229 W 43 LLC - Case No. 21-10282	<input type="checkbox"/> Knotel 54 W 21st LLC - Case No. 21-10320	<input type="checkbox"/> Knotel Varick LLC - Case No. 21-10355
<input type="checkbox"/> Knotel 25 W 45th LLC - Case No. 21-10283	<input type="checkbox"/> Knotel 54 W 22nd LLC - Case No. 21-10321	<input type="checkbox"/> Knotel William LLC - Case No. 21-10356
<input type="checkbox"/> Knotel 250 Hudson LLC - Case No. 21-10284	<input type="checkbox"/> Knotel 55 W 21St LLC - Case No. 21-10322	<input type="checkbox"/> Paces Ferry Road ATL LLC - Case No. 21-10357
<input type="checkbox"/> Knotel 250 Hudson ST LLC - Case No. 21-10285	<input type="checkbox"/> Knotel 550 Montgomery LLC - Case No. 21-10323	<input type="checkbox"/> Pine Street Tenant NY LLC - Case No. 21-10358
<input type="checkbox"/> Knotel 26 OFarrell LLC - Case No. 21-10286	<input type="checkbox"/> Knotel 551 Fifth Ave LLC - Case No. 21-10324	<input type="checkbox"/> Tenant 660 Mkt St SF LLC - Case No. 21-10359
<input type="checkbox"/> Knotel 26 W 17 LLC - Case No. 21-10287	<input type="checkbox"/> Knotel 560 LEXINGTON LLC - Case No. 21-10325	
<input type="checkbox"/> Knotel 261 Madison LLC - Case No. 21-10288	<input type="checkbox"/> Knotel 575 8th Ave LLC - Case No. 21-10326	
<input type="checkbox"/> Knotel 27 W 23rd ST LLC - Case No. 21-10289	<input type="checkbox"/> Knotel 580 5th Ave NYC LLC - Case No. 21-10327	
<input type="checkbox"/> Knotel 29 W 17th LLC - Case No. 21-10290	<input type="checkbox"/> Knotel 580 Market LLC - Case No. 21-10328	
<input type="checkbox"/> Knotel 3 E 28th LLC - Case No. 21-10291	<input type="checkbox"/> Knotel 584 Broadway LLC - Case No. 21-10329	
<input type="checkbox"/> Knotel 30 Broad LLC - Case No. 21-10292	<input type="checkbox"/> Knotel 5-9 USW LLC - Case No. 21-10316	

Official Form 410
Proof of Claim

04/19

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. 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, which is January 31, 2021 for all Debtors except Knotel Canada, Inc. For Knotel Canada, Inc., the case was filed on March 8, 2021.

Carefully read instructions included with this Proof of Claim before completing. In order to have your claim considered for payment and/or voting purposes, complete ALL applicable questions. The original of this Proof of Claim must be sent to: Debtor Name, c/o Omni Agent Solutions, 5955 De Soto Avenue, Suite 100, Woodland Hills, CA 91367.

Part 1: Identify the Claim

<p>1. Who is the current creditor?</p>	<p>_____</p> <p>Name of the current creditor (the person or entity to be paid for this claim)</p> <p>Other names the creditor used with the debtor _____</p>	
<p>2. Has this claim been acquired from someone else?</p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes From whom? _____</p>	
<p>3. Where should notices and payments to the creditor be sent?</p> <p>Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)</p>	<p>Where should notices to the creditor be sent?</p> <p>Name _____</p> <p>Number Street _____</p> <p>City State ZIP Code _____</p> <p>Contact Phone _____</p> <p>Contact email _____</p> <p>Uniform claim identifier for electronic payments in chapter 13 (if you use one) _____</p>	<p>Where should payments to the creditor be sent? (if different)</p> <p>Name _____</p> <p>Number Street _____</p> <p>City State ZIP Code _____</p> <p>Contact Phone _____</p> <p>Contact email _____</p>
<p>4. Does this claim amend one already filed?</p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes Claim Number on court claims registry (if known) _____ Filed On _____</p> <p style="text-align: right;">MM / DD / YYYY</p>	
<p>5. Do you know if anyone else has filed a proof of claim for this claim?</p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes Who made the earlier filing? _____</p>	

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? No Yes Last 4 digits of the debtor's account or any number you use to identify the debtor: _____

7. How much is the claim? \$ _____ Does this amount include interest or other charges? No Yes Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? 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

9. Is all or part of the claim secured? No Yes The claim is secured by a lien on property

Nature of property:

Real Estate If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*

Motor Vehicle

Other Describe: _____

Basis for perfection: _____

Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded).

Value of Property: \$ _____

Amount of the claim that is secured: \$ _____

Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7).

Amount necessary to cure any default as of the date of the petition: \$ _____

Annual Interest Rate: (when case was filed) _____%

Fixed Variable

10. Is this claim based on a lease? No Yes Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff? No Yes Identify the property: _____

12. Is this claim for the value of goods received by the debtor within 20 days before the commencement date of this case (11 U.S.C. §503(b)(9)).? No Yes Amount of 503(b)(9) Claim: \$ _____

13. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

- No
 Yes *Check all that apply*

Amount entitled to priority

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

- Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). \$ _____
- Up to \$3,025* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). \$ _____
- Wages, salaries, or commissions (up to \$13,650*) 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). \$ _____
- Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). \$ _____
- Contributions to an employee benefit plan 11 U.S.C. § 507(a)(5). \$ _____
- Other. Specify subsection of 11 U.S.C. § 507(a)(____) that applies. \$ _____

* Amounts are subject to adjustment on 4/01/22 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it.

FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

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.

Check the appropriate box:

- I am the creditor.
- I am the creditor's attorney or authorized agent.
- I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
- I am the guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* 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.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date _____
 MM / DD / YYYY

 Signature

Print the name of the person who is completing and signing this claim:

Name _____
 First Name Middle Name Last Name

Title _____

Company _____
 Identify the corporate servicer as the company if the authorized agent is a servicer.

Address _____
 Number Street

City State ZIP Code

Contact Phone _____ Email _____

EXHIBIT 2

BAR DATE NOTICE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Knotel, Inc., *et al.*,

Debtors.¹

Chapter 11

Case No. 21-10146 (MFW)

Jointly Administered

NOTICE OF BAR DATES FOR FILING PREPETITION CLAIMS AND ADMINISTRATIVE CLAIMS

On January 31, 2021 (the “Petition Date”), the above-captioned debtors and debtors in possession (the “Debtors”) filed voluntary chapter 11 petitions in the U.S. Bankruptcy Court for the District of Delaware (the “Court”). On [•], 2021, the Court entered an order (the “Bar Date Order”) establishing the following deadlines for filing certain prepetition claims and administrative expense claims in the Debtors’ chapter 11 cases:

(i) **[30 days from service of this notice], 2021, 5:00 p.m. prevailing Eastern Time** as the deadline (the “General Bar Date”) to file a proof of claim in respect of any prepetition claim against any of the Debtors, including, without limitation, any secured claim, unsecured claim, priority claim, or claim asserted under section 503(b)(9) of the Bankruptcy Code for goods delivered and received by any of the Debtors within 20 days of the Petition Date;

(ii) **[30 days from service of this notice], 2021, 5:00 p.m. prevailing Eastern Time** as the deadline (the “Administrative Claim Bar Date”) for each person or entity to file a request to allow any unpaid administrative expense claim (each, an “Administrative Claim”) against any of the Debtors arising on or after the Petition Date and through and including the date of the service of the Bar Date Notice, unless otherwise provided in Bar Date Order;

(iii) **July 30, 2021**, as the deadline (the “Government Bar Date”) by which a governmental unit must file a proof of claim in respect of a prepetition claim against any of the Debtors;

(iv) the later of (i) the General Bar Date or the Government Bar Date (if applicable) and (ii) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days following service of an order approving rejection of an executory contract or unexpired lease of the Debtors as the deadline for an entity asserting a claim for damages against any of the Debtors arising from such rejection to file a proof of claim on account of such damages;

(v) the later of (i) the General Bar Date or the Government Bar Date (if applicable) and (ii) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days following service of notice of an amendment to the Debtors’ schedules of assets and liabilities (the “Schedules”) as the deadline for an entity whose claim is affected by such amendment to file, amend, or supplement a proof of claim with respect to such claim.

Consult the Bar Date Order for Details on Who Must File a Claim. Consult the Bar Date Order for additional details on whether you are required to file a proof of claim or request for allowance of an Administrative Claim. Copies of the Bar Date Order, the Schedules and other documents and information regarding the Debtors’ chapter 11 cases are available free of charge at <https://omniagentsolutions.com/knotel>.

Instructions for Filing Proofs of Claim for Prepetition Claims. Any person or entity asserting a prepetition claim against the Debtors **MUST** abide by the following procedures and requirements in preparing and filing proofs of claim: (i) proofs of claim must be (a) submitted on the enclosed claim form or Official Form B410 and (b) written in

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://www.omniagentsolutions.com/knotel> or, alternatively, via the Bankruptcy Court at <https://ecf.deb.uscourts.gov/cgi-bin/login.pl> with a Public Access to Court Electronic Records (“PACER”) account, which may be obtained at <https://pacer.uscourts.gov>. The location of Debtor Knotel, Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is 5-9 Union Square West, New York, NY 10003

the English language, denominated in U.S. dollars, specify the name and case number of the Debtor against whom the claim is asserted, set forth the legal and factual bases for the claim, include supporting documentation or an explanation for why supporting documentation is not available, and be signed under penalty of perjury by the claimant or the claimant's attorney or authorized agent; and (ii) if the claimant asserts a claim or claims against more than one Debtor, the claimant must file a separate proof of claim against each applicable Debtor.

A proof of claim may be filed electronically at <https://omniagentsolutions.com/knotel-claims> using the interface available after clicking the link entitled "Submit a Proof of Claim". If filed by hardcopy, an original, signed copy of the proof of claim must be sent to Knotel, Inc., c/o Omni Agent Solutions, Claims Processing 5955 De Soto Ave, Suite 100, Woodland Hills, CA 91367.

A claim must be submitted **so as to be actually received** on or before the applicable Bar Date. Proofs of claim sent by means other than as described above will not be accepted.

Instructions for Filing Administrative Claims. Any person or entity filing a request for allowance of an Administrative Claim against the Debtors **MUST** abide by the following procedures and requirements: any request for allowance of an Administrative Claim must (i) contain and be filed under the case caption and on the docket of these jointly administered cases either by electronic filing through CM/ECF by the Administrative Claim Bar Date, or, if filed other than by CM/ECF, be filed sufficiently in advance so as to actually appear on the Court's docket by the Administrative Claim Bar Date and (ii) be written in the English language, denominated in U.S. dollars, specify the name and case number of the Debtor against whom the claim is asserted, set forth the legal and factual bases for the claim, include supporting documentation or an explanation for why supporting documentation is not available, and be signed under penalty of perjury by the claimant or the claimant's attorney or authorized agent.

THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THE DEBTORS BELIEVE YOU HAVE A CLAIM. ANY PERSON OR ENTITY REQUIRED TO TIMELY FILE A PROOF OF CLAIM OR A REQUEST FOR ALLOWANCE OF AN ADMINISTRATIVE CLAIM ON OR BEFORE THE APPLICABLE BAR DATE, BUT FAILS TO DO SO SHALL NOT BE TREATED AS A CREDITOR WITH RESPECT TO SUCH CLAIM FOR THE PURPOSE OF VOTING AND DISTRIBUTION IN THESE CHAPTER 11 CASES ON ACCOUNT OF SUCH CLAIM OR ADMINISTRATIVE CLAIM.

If you have any questions relating to this notice, please contact the Debtors' notice and claims agent, Omni, at 866-771-0565 (toll-free) or by email at knotelinquiries@omniagnt.com.

Dated: April __, 2021

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

MILBANK LLP

Robert J. Dehney (No. 3578)
Matthew B. Harvey (No. 5186)
Tamara K. Mann (No. 5643)
Matthew O. Talmo (No. 6333)
Eric W. Moats (No. 6441)
1201 N. Market Street, 16th Floor
P.O. Box 1347
Wilmington, Delaware 19899-1347
Telephone: (302) 658-9200
Facsimile: (302) 658-3989
Email: rdehney@morrisonichols.com
mharvey@morrisonichols.com
tmann@morrisonichols.com
mtalmo@morrisonichols.com
emoats@morrisonichols.com

Mark Shinderman (admitted *pro hac vice*)
Daniel B. Denny (admitted *pro hac vice*)
2029 Century Park East, 33rd Floor
Los Angeles, CA 90067
Telephone: (424) 386-4000
Facsimile: (213) 629-5063
Email: mshinderman@milbank.com
ddenny@milbank.com

Counsel to Debtors and Debtors in Possession

EXHIBIT 3

PUBLICATION NOTICE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Knotel, Inc., *et al.*,

Debtors.¹

Chapter 11

Case No. 21-10146 (MFW)

Jointly Administered

NOTICE OF DEADLINES TO FILE CERTAIN CLAIMS

To all persons or entities with claims against the above-captioned debtors and debtors in possession: On January 31, 2021 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 petitions in the United States Bankruptcy Court for the District of Delaware (the “Court”).

By order dated [●], 2021 (the “Bar Date Order”), the Court established claim filing deadlines as follows: (i) all persons or entities with a claim against any of the Debtors that arose before the Petition Date, no matter how remote or contingent, **MUST FILE A PROOF OF CLAIM** on or before [____], 2021, **5:00 p.m. prevailing Eastern Time**; (ii) all persons or entities who have an unpaid administrative expense claim against any of the Debtors arising on or after the Petition Date and through and including [____] **MUST FILE A REQUEST FOR ALLOWANCE OF AN ADMINISTRATIVE CLAIM** on or before [____], 2021, **5:00 p.m. prevailing Eastern Time**; and (iii) governmental units **MUST FILE A PROOF OF CLAIM** on or before **July 30, 2021**. A claim must be submitted **so as to be actually received** on or before the applicable deadline to be deemed timely.

Copies of the Bar Date Order, the Debtors’ schedules of assets and liabilities and other documents and information regarding the Debtors’ chapter 11 cases are available free of charge at <https://omniagentsolutions.com/knotel>, by calling 866-771-0565 (toll-free), or by email at knotelinquiries@omniagnt.com. Consult the Bar Date Order for additional details on whether you are required to file a proof of claim or request for allowance of an administrative expense claim, as well as instructions and procedures for completing and filing proofs of claim or requests for allowance of an administrative expense claim. Do not contact the Clerk of Court for legal advice.

ANY PERSON OR ENTITY THAT IS REQUIRED TO TIMELY FILE A PROOF OF CLAIM OR A REQUEST FOR ALLOWANCE OF AN ADMINISTRATIVE EXPENSE CLAIM BUT FAILS TO DO SO SHALL NOT BE TREATED AS A CREDITOR WITH RESPECT TO SUCH CLAIM FOR THE PURPOSE OF VOTING AND DISTRIBUTION IN THE DEBTORS’ CHAPTER 11 CASES.

BY ORDER OF THE COURT

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://www.omniagentsolutions.com/knotel> or, alternatively, via the Bankruptcy Court at <https://ecf.deb.uscourts.gov/cgi-bin/login.pl> with a Public Access to Court Electronic Records (“PACER”) account, which may be obtained at <https://pacer.uscourts.gov>. The location of Debtor Knotel, Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is 5-9 Union Square West, New York, NY 10003.