

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

MOLECULAR TEMPLATES, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 25-10739 (BLS)

(Joint Administration Requested)

MOTION OF DEBTORS FOR ENTRY OF INTERIM AND FINAL ORDERS: (I) AUTHORIZING THE DEBTORS TO (A) FILE A CONSOLIDATED LIST OF CREDITORS IN LIEU OF SUBMITTING A SEPARATE MATRIX FOR EACH DEBTOR, (B) FILE A CONSOLIDATED LIST OF THE DEBTORS' THIRTY LARGEST UNSECURED CREDITORS, AND (C) REDACT CERTAIN PERSONALLY IDENTIFIABLE INFORMATION, AND (II) GRANTING RELATED RELIEF

The above-captioned debtors and debtors in possession (collectively, the “Debtors”), by and through their undersigned proposed counsel, hereby submit this motion (the “Motion”) for entry of interim and final orders, substantially in the form attached hereto as **Exhibit A** (the “Interim Order”) and **Exhibit B** (the “Final Order” and, together with the Interim Order, the “Proposed Orders”), (i) authorizing the Debtors to (a) file a consolidated list of creditors in lieu of submitting a separate mailing matrix for each debtor, (b) file a consolidated list of the Debtors’ thirty largest unsecured creditors in lieu of filing lists for each debtor, and (c) redact certain personally identifiable information for the Debtors’ individual creditors; and (ii) granting related relief. In addition, the Debtors request that the Court schedule a final hearing approximately 21 days from the Petition Date. In support of this Motion, the Debtors respectfully represent as follows:

¹ The Debtors in these chapter 11 cases, along with the Debtors’ federal tax identification numbers, are: Molecular Templates, Inc. (9596) and Molecular Templates OpCo, Inc. (6035). The Debtors’ mailing address is: 124 Washington Street, Ste. 101, Foxboro, MA 02035. All Court filings can be accessed at: <https://www.veritaglobal.net/MolecularTemplates>.



JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction over these chapter 11 cases (these “Chapter 11 Cases”) pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012.

2. This is a core proceeding pursuant to 28 U.S.C. § 157(b), and pursuant to Rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the Debtors consent to the entry of a final order with respect to this Motion if it is determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

3. Venue of these Chapter 11 Cases and this Motion in this District is proper under 28 U.S.C. §§ 1408 and 1409.

4. The statutory bases for the relief requested in this Motion are sections 105(a) and 521 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 1007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Local Rules 1001-1(d), 2002-1, and 9013-1(m).

BACKGROUND

5. On April 20, 2025 (the “Petition Date”), the Debtors each commenced a voluntary case under chapter 11 of the Bankruptcy Code in this Court. The Debtors have requested joint administration of their chapter 11 cases for procedural purposes. The Debtors are operating their businesses as debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. No trustee, examiner or official committee has been appointed in these cases.

6. Additional detail regarding the Debtors, their business, the events leading to the commencement of these cases, and the facts and circumstances supporting the relief requested

herein is set forth in the *Declaration of Craig Jalbert in Support of Debtors' Chapter 11 Petitions and First Day Motions* (the "First Day Declaration"), filed concurrently herewith and incorporated herein by reference.

RELIEF REQUESTED

7. By this Motion, the Debtors seek entry of the Proposed Orders, substantially in the forms attached hereto as **Exhibit A** and **Exhibit B**, (i) authorizing the Debtors to (a) file a consolidated list of creditors in lieu of submitting a separate mailing matrix for each Debtor, (b) file a consolidated list of the Debtors' thirty largest unsecured creditors in lieu of filing lists for each Debtor, and (c) redact certain personally identifiable information for the Debtors' individual creditors; and (ii) granting related relief.

BASIS FOR RELIEF REQUESTED

I. Permitting Debtors to File a Consolidated List of Creditors in Lieu of Filing a Separate Mailing Matrix for Each Debtor is in the Interest of Justice.

8. Each debtor, or its duly appointed claims agent, is required by Local Rule 2002-1(e)(v) to maintain "a separate claims register and separate creditor mailing matrix for each debtor in jointly administrated cases." However, the Court may modify application of the Local Rules "in the interest of justice," pursuant to Local Rule 1001-1(d).

9. Permitting the Debtors to maintain a single consolidated list of creditors (the "Consolidated Creditor Matrix") in lieu of maintaining a separate creditor matrix for each Debtor is warranted. Because the Debtors operate as a single business enterprise, granting them authority to file a single, consolidated list of their largest creditors is appropriate as it would be unnecessarily burdensome to require the Debtors to segregate and convert all records into a debtor-specific creditor format.

10. Similar relief to that requested herein has been granted by various courts in this district. *See, e.g., In re Am. Physician Partners, LLC*, No. 23-11469 (BLS) (Bankr. D. Del. Oct. 27, 2023), ECF No. 295 (authorizing debtors to file a consolidated list of creditors in lieu of submitting a separate mailing matrix for each debtor on final basis); *In re Yellow Corp.*, No. 23-11069 (CTG) (Bankr. D. Del. Sept. 13, 2023), ECF No. 528 (same); *In re Lannett Co., Inc.*, No. 23-10559 (JKS) (Bankr. D. Del. May 5, 2023), ECF No. 69 (authorizing debtors to file a consolidated list of creditors in lieu of submitting a separate mailing matrix for each debtor on interim basis); *In re SiO2 Med. Prods., Inc.*, No. 23-10366 (JTD) (Bankr. D. Del. Mar. 30, 2023), ECF No. 7 (same).²

11. Accordingly, the Debtors submit that permitting Debtors to maintain a Consolidated Creditor Matrix in lieu of maintaining debtor-specific matrices, “is in the interest of justice” pursuant to Local Rule 1001-1(d).

II. It is Appropriate to Permit Debtors to File a Single Consolidated List of the Debtors’ 30 Largest Unsecured Creditors in These Chapter 11 Cases.

12. Bankruptcy Rule 1007(d) requires a debtor to file “a list containing the name, address and claim of the creditors that hold the twenty largest unsecured claims, excluding insiders” (the “Top 20 List”) and Local Rule 1007-2(b) allows debtors in jointly administered cases with a claims and noticing agent to file the list required by Bankruptcy Rule 1007(d) on a consolidated basis. The Top 20 List aids the Office of the United States Trustee (the “U.S. Trustee”) in its efforts to communicate with creditors and evaluate the types and amounts of unsecured claims against a debtor. It also assists the U.S. Trustee in identifying potential candidates to serve on an official committee of unsecured creditors in the Chapter 11 Cases.

² Because of the voluminous nature of the orders cited herein, such orders have not been attached to this Motion. Copies of these orders are available upon request of the Debtors’ proposed counsel.

13. The Debtors request authority to file a single list of their thirty largest general unsecured creditors on a consolidated basis (the “Top 30 List”).

14. Because the top creditors of the Debtors overlap, and the Debtors generally operated, prior to the Petition Date, as a consolidated enterprise, it would be unnecessarily burdensome to require the Debtors to compile separate top-20 or top-30 lists of creditors for each debtor. Accordingly, the Debtors submit that it is appropriate to permit them to instead submit the Top 30 List for each of the Debtors.

15. Courts in this district have granted relief like the relief requested herein. *See, e.g., In re Am. Physician Partners*, No. 23-11469 (BLS), ECF No. 295 (authorizing a consolidated top 30 general unsecured creditors list on a final basis); *In re Yellow Corp.*, No. 23-11069 (CTG), ECF No. 528 (same); *In re Ayris, Inc.*, No. 23-11131 (TMH), ECF No. 59 (same); *In re Lannett Co., Inc.*, No. 23-10559 (JKS), ECF No. 69 (authorizing a consolidated top 30 general unsecured creditors list on an interim basis); *In re Si02 Med. Prods., Inc.*, No. 23-10366 (JTD), ECF No. 7 (same).

16. Accordingly, filing the Top 30 List is appropriate under the circumstances, necessary for the efficient administration of these Chapter 11 Cases, is in the best interest of the Debtors’ estates, and is “in the interest of justice” pursuant to Local Rule 1001-1(c).

III. Personal Identifying Information Contained in the Consolidated Creditor Matrix Should be Redacted.

17. The Bankruptcy Code authorizes courts, for cause, to limit public access to “[a]ny means of identification . . . contained in a paper filed, or to be filed” in a bankruptcy case “to the extent the court finds that disclosure of such information would create undue risk of identity theft or other unlawful injury to the individual or the individual’s property.” 11 U.S.C. § 107(c)(1); *see*

also *Goldstein v. Forbes (In re Cendant Corp.)*, 260 F.3d 183, 192, 194 (3d Cir. 2001) (finding the public’s right of access to judicial proceedings and records “is not absolute”).

18. The Debtors respectfully submit that it is appropriate and necessary to authorize Debtors to redact from any paper filed, to be filed, with this Court in these Chapter 11 Cases the personal identifying information, including email addresses and home addresses, of any of the Debtors’ individual equity security holders and creditors, including the Debtors’ customers and current and former employees. Such relief is appropriate because such information can be used to perpetuate identity theft, execute phishing schemes, or otherwise lead to unlawful injury, such as harassment or stalking,³ under section 107(c)(1) of the Bankruptcy Code.

19. Courts in this district have recognized the importance of authorizing redactions of individuals’ personal identifying information. See Hr’g Tr. at 25:6–7, *In re Art Furniture, LLC*, No. 20-10533 (CSS) (Bankr. D. Del. Mar. 2020) (overruling objection to redactions and describing authorization of redactions of personally identifiable information as “routine” and an “obvious relief”); Hr’g Tr. at 24:21–25:10, *In re Clover Techs. Grp., LLC*, No. 19-12680 (KBO) (Bankr. D. Del. Jan. 22, 2020) (overruling objection to redactions and describing such authorization as “common sense”).

20. Courts in this district have granted relief like the relief requested herein. See, e.g., *In re Am. Physician Partners, LLC*, No. 23-11469 (BLS), ECF No. 295 (authorizing debtors to redact personally identifiable information of any natural persons); *In re Yellow Corp.*, No. 23-11069 (CTG), ECF No. 528 (same); *In re Ayris, Inc.*, No. 23-11131 (TMH), ECF No. 59 (same);

³ In 2017, an abusive former partner of an employee of a debtor tracked the employee to her home using her personal information that was disclosed in the chapter 11 proceedings in Delaware. See *In re Charming Charlie Holdings, Inc.*, No. 19-11534 (CSS) (Bankr. D. Del. July 11, 2019), ECF No. 4.

In re Lannett Co., Inc., No. 23-10559 (JKS), ECF No. 335 (same); *In re PGX Holdings, Inc.*, No. 23-10718 (CTG) (Bankr. D. Del. July 19, 2023), ECF No. 201 (same).

21. Debtors propose to provide the U.S. Trustee and this Court an unredacted version of the Consolidated Creditor Matrix upon request, and to file an unredacted copy of the Consolidated Creditor Matrix under seal.

22. For these reasons, the Debtors respectfully submit that cause exists to authorize Debtors to redact, pursuant to 11 U.S.C. § 107(c)(1), personally identifiable information, including home addresses and email addresses, of the Debtors' individual creditors who are listed on the Consolidated Creditor Matrix, or any other document filed with the Court. The relief is required to avoid rendering individuals more susceptible to identity theft and other unlawful injury to their person or their property.

COMPLIANCE WITH LOCAL RULE 9018-1(d)

23. Under the circumstances and given the nature of the relief requested in this Motion, the Debtors are unable to confer with the individuals whose information is requested to be sealed. Accordingly, the Debtors submit that there is cause to excuse the Debtors from the meet and confer obligations under Local Rule 9018-1(d).

NOTICE

24. Notice of this Motion is being provided to: (a) the Office of the United States Trustee for the District of Delaware (Attn: Jane M. Leamy, jane.m.leafy@usdoj.gov); (b) the parties included on the Debtors' consolidated list of their 30 largest unsecured creditors; (c) counsel to K2 HealthVentures LLC; (d) the Securities and Exchange Commission; (e) the Internal Revenue Service; (f) the United States Attorney's Office for the District of Delaware; and (g) any party that has requested notice pursuant to Bankruptcy Rule 2002. As this Motion is seeking first-day relief, the Debtors will serve copies of this Motion and any order entered in respect of this

Motion as required by Local Rule 9013-1(m). The Debtors respectfully submit that no further notice of this Motion is required under the circumstances.

CONCLUSION

WHEREFORE, the Debtors request that the Court enter the Proposed Orders, granting the relief requested herein and such other and further relief as is just and proper.

Dated: April 21, 2025
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Andrew R. Remming

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*Proposed Counsel to the Debtors and
Debtors in Possession*

Exhibit A

Proposed Interim Order

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

In re

MOLECULAR TEMPLATES, INC., *et al.*,

Debtors.⁴

Chapter 11

Case No. 25-10739 (BLS)

(Joint Administration Requested)

Re: D.I. ____

**INTERIM ORDER (I) AUTHORIZING THE DEBTORS TO (A) FILE A
CONSOLIDATED LIST OF CREDITORS IN LIEU OF SUBMITTING A SEPARATE
MATRIX FOR EACH DEBTOR; (B) FILE A CONSOLIDATED LIST OF THE
DEBTORS' THIRTY LARGEST UNSECURED CREDITORS; AND (C) REDACT
CERTAIN PERSONALLY IDENTIFIABLE INFORMATION; AND
(II) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)⁵ of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for entry of interim and final orders, authorizing the Debtors to (a) file a consolidated list of creditors in lieu of submitting a separate matrix for each debtor, (b) file a consolidated list of the Debtors’ thirty largest unsecured creditors, and (c) redact certain personally identifiable information for the Debtors’ individual creditors and interest holders, and (d) granting related relief, all as more fully set forth in the Motion; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012 (Sleet, C.J.); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this is a core proceeding pursuant to 28 U.S.C. § 157(b);

⁴ The Debtors in these chapter 11 cases, along with the Debtors’ federal tax identification numbers, are: Molecular Templates, Inc. (9596) and Molecular Templates OpCo, Inc. (6035). The Debtors’ mailing address is: 124 Washington Street, Ste. 101, Foxboro, MA 02035. All Court filings can be accessed at: <https://www.veritaglobal.net/MolecularTemplates>.

⁵ Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

and notice of the Motion and the hearing thereon being sufficient under the circumstances; and it appearing that no other or further notice need be provided; and it appearing that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and the Court having determined that the relief sought in the Motion is in the best interests of the Debtors, their estates and creditors; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED on an interim basis as set forth herein.
2. The requirements of Local Rule 2002-1(e)(v) that separate mailing matrices be submitted for each debtor are waived, and the Debtors are authorized to submit a consolidated list of creditors.
3. The Debtors are authorized to file a consolidated list of the Debtors' thirty largest unsecured creditors. The filing of the Top 30 List shall satisfy Bankruptcy Rule 1007(d) as to all Debtors.
4. The Debtors are authorized to redact home address information and email information of the Debtors' individual creditors and interest holders who are natural persons listed on the Creditor Matrix, schedules and statements, or similar documents filed with the Court. The Debtors reserve any and all rights to request the authority to seal additional personally identifiable information in future documents filed with the Court. The U.S. Trustee and the Court will receive an unredacted copy of the Consolidated Creditor Matrix. An unredacted copy of the Consolidated Creditor Matrix will be filed under seal. Any party in interest may make a request for an unredacted copy of the Consolidated Creditor Matrix.
5. The Debtors are not required to provide an unredacted version of the Consolidated Creditor Matrix to any party in interest except for the U.S. Trustee and counsel to

any official committee appointed in these cases unless and until such party signs a confidentiality agreement acceptable to the Debtors, unless otherwise ordered by the Court.

6. Notwithstanding any Bankruptcy Rule to the contrary, the terms and conditions of this Order are immediately effective and enforceable upon entry.

7. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Interim Order in accordance with the Motion.

This Court shall retain jurisdiction with respect to all matters arising from or related to interpretation, implementation, and enforcement of this Interim Order.

Exhibit B

Proposed Final Order

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

In re

MOLECULAR TEMPLATES, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 25-10739 (BLS)

(Joint Administration Requested)

Re: D.I. ____

**FINAL ORDER (I) AUTHORIZING THE DEBTORS TO (A) FILE A CONSOLIDATED
LIST OF CREDITORS IN LIEU OF SUBMITTING A SEPARATE MATRIX FOR
EACH DEBTOR; (B) FILE A CONSOLIDATED LIST OF THE DEBTORS' THIRTY
LARGEST UNSECURED CREDITORS; AND (C) REDACT CERTAIN PERSONALLY
IDENTIFIABLE INFORMATION; AND
(II) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for entry interim and final orders, authorizing the Debtors to (a) file a consolidated list of creditors in lieu of submitting a separate matrix for each debtor, (b) file a consolidated list of the Debtors’ thirty largest unsecured creditors, and (c) redact certain personally identifiable information for the Debtors’ individual creditors and interest holders, and (d) granting related relief, all as more fully set forth in the Motion; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012 (Sleet, C.J.); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this is a core proceeding pursuant to 28 U.S.C. § 157(b); and notice of the Motion

¹ The Debtors in these chapter 11 cases, along with the Debtors’ federal tax identification numbers, are: Molecular Templates, Inc. (9596) and Molecular Templates OpCo, Inc. (6035). The Debtors’ mailing address is: 124 Washington Street, Ste. 101, Foxboro, MA 02035. All Court filings can be accessed at: <https://www.veritaglobal.net/MolecularTemplates>.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

and the hearing thereon being sufficient under the circumstances; and it appearing that no other or further notice need be provided; and it appearing that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and the Court having determined that the relief sought in the Motion is in the best interests of the Debtors, their estates and creditors; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED on a final basis as set forth herein.
2. The requirements of Local Rule 2002-1(e)(v) that separate mailing matrices be submitted for each debtor are waived, and the Debtors are authorized to submit a consolidated list of creditors.
3. The Debtors are authorized to file a consolidated list of the Debtors' thirty largest unsecured creditors. The filing of the Top 30 List shall satisfy Bankruptcy Rule 1007(d) as to all Debtors.
4. The Debtors are authorized to redact home address information and email information of the Debtors' individual creditors and interest holders who are natural persons listed on the Creditor Matrix, schedules and statements, or similar documents filed with the Court. The Debtors reserve any and all rights to request the authority to seal additional personally identifiable information in future documents filed with the Court. The U.S. Trustee and the Court will receive an unredacted copy of the Consolidated Creditor Matrix. An unredacted copy of the Consolidated Creditor Matrix will be filed under seal. Any party in interest may make a request for an unredacted copy of the Consolidated Creditor Matrix.
5. The Debtors are not required to provide an unredacted version of the Consolidated Creditor Matrix to any party in interest except for the U.S. Trustee and counsel to

any official committee appointed in these cases unless and until such party signs a confidentiality agreement acceptable to the Debtors, unless otherwise ordered by the Court.

6. Notwithstanding any Bankruptcy Rule to the contrary, the terms and conditions of this Final Order are immediately effective and enforceable upon entry.

7. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Final Order in accordance with the Motion.

This Court shall retain jurisdiction with respect to all matters arising from or related to interpretation, implementation, and enforcement of this Final Order.