

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

MOLECULAR TEMPLATES, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10739 (BLS)

(Jointly Administered)

**SECOND² AMENDED NOTICE OF AGENDA FOR HEARING SCHEDULED FOR
JULY 1, 2025, AT 10:00 A.M. (EASTERN TIME)**

This proceeding will be conducted in person in Courtroom 1.

Please refer to Judge Shannon's Chambers Procedures (<https://www.deb.uscourts.gov/judge-brendan-l-shannon>) and the Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>) for information on the method of allowed participation (video or audio), Judge Shannon's expectations of remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (Prevailing Eastern Time) the business day before the hearing unless otherwise noticed using the eCourtAppearances tool available on the Court's website.

MATTER GOING FORWARD

1. Debtors' Motion for Entry of an Order (I) Approving the Combined Disclosure Statement and Chapter 11 Plan of Reorganization of Molecular Templates, Inc. and Its Affiliate Debtor on an Interim Basis; (II) Establishing Solicitation and Tabulation Procedures; (III) Approving the Form of Ballots and Solicitation Materials; (IV) Establishing the Voting Record Date; (V) Fixing the Date, Time, and Place for the Confirmation Hearing and the Deadline for Filing Objections Thereto; and (VI) Granting Related Relief ([D.I. 51](#), filed 4/23/25).

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 Amended items in **bold**.



Objection Deadline: June 27, 2025, at 4:00 p.m. (ET).

Responses Received:

- A. Informal comments received from the SEC;
- B. Informal comments received from the DOJ; and
- C. Objection of the United States Trustee to Confirmation of the Revised Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization for Molecular Templates, Inc. and Its Affiliated Debtor ([D.I. 156](#), filed 6/26/25).

Related Documents:

- A. Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization for Molecular Templates, Inc. and its Affiliated Debtor ([D.I. 25](#), filed 4/21/25);
- B. Debtors' Reply to U.S. Trustee's Objection to Debtors' Motion for Entry of an Order (I) Approving the Combined Disclosure Statement and Chapter 11 Plan of Reorganization of Molecular Templates, Inc. and Its Affiliate Debtor on an Interim Basis; (II) Establishing Solicitation and Tabulation Procedures; (III) Approving the Form of Ballots and Solicitation Materials; (IV) Establishing the Voting Record Date; (V) Fixing the Date, Time, and Place for the Confirmation Hearing and the Deadline for Filing Objections Thereto; and (VI) Granting Related Relief ([D.I. 93](#), filed 5/18/25);
- C. Notice of Filing Revised Proposed Order Approving the Combined Disclosure Statement and Chapter 11 Plan of Reorganization of Molecular Templates, Inc. and Its Affiliate Debtor on an Interim Basis; (II) Establishing Solicitation and Tabulation Procedures; (III) Approving the Form of Ballots and Solicitation Materials; (IV) Establishing the Voting Record Date; (V) Fixing the Date, Time, and Place for the Confirmation Hearing and the Deadline for Filing Objections Thereto; and (VI) Granting Related Relief ([D.I. 98](#), filed 5/19/25);
- D. Statement of DIP Lender in Support of Confirmation of Plan ([D.I. 99](#), filed 5/20/25);
- E. Notice of Filing of Revised Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization for Molecular Templates, Inc and its Affiliated Debtor ([D.I. 100](#), filed 5/20/25);
- F. Order Approving the Combined Disclosure Statement and Chapter 11 Plan of Reorganization of Molecular Templates, Inc. and Its Affiliate Debtor on an Interim Basis; (II) Establishing Solicitation and Tabulation Procedures; (III) Approving the Form of Ballots and Solicitation Materials; (IV) Establishing the Voting Record Date; (V) Fixing the Date, Time, and Place for the Confirmation Hearing and the

Deadline for Filing Objections Thereto; and (VI) Granting Related Relief ([D.I. 122](#), filed 5/27/25);

- G. Revised Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization for Molecular Templates, Inc. and its Affiliated Debtor ([D.I. 124](#), filed 5/27/25);
- H. Notice of (I) Interim Approval of Combined Disclosure Statement and Plan; and (II) the Hearing to Consider (A) Final Approval of the Combined Disclosure Statement and Plan as Containing Adequate Information and (B) Confirmation of the Combined Disclosure Statement and Plan ([D.I. 127](#), filed 5/29/25);
- I. Notice of Filing of Plan Supplement to Revised Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization for Molecular Templates, Inc. and its Affiliated Debtor ([D.I. 147](#), filed 6/17/25);
- J. Notice of Filing of Amended Plan Supplement Document with Respect to Debtors' Revised Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization for Molecular Templates, Inc. and its Affiliated Debtor ([D.I. 150](#), filed 6/20/25);
- K. Affidavit of Publication of the Notice of (I) Interim Approval of Combined Disclosure Statement and Plan; and (II) the Hearing to Consider (A) Final Approval of the Combined Disclosure Statement and Plan as Containing Adequate Information and (B) Confirmation of the Combined Disclosure Statement and Plan in The Wall Street Journal ([D.I. 154](#), filed 6/26/25);
- L. Notice of Revised Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization for Molecular Templates, Inc. and its Affiliated Debtor ([D.I. 159](#), filed 6/27/25);
- M. Declaration of Adam J. Gorman of Kurtzman Carson Consultants, LLC dba Verita Global Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the Revised Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization of Molecular Templates, Inc. and its Affiliated Debtor ([D.I. 160](#), filed 6/27/25);
- N. Declaration of Craig Jalbert in Support of Confirmation of the Revised Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization for Molecular Templates, Inc. and its Affiliated Debtor ([D.I. 161](#), filed 6/27/25);
- O. Debtors' Memorandum of Law in Support of Confirmation of the Revised Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization for Molecular Templates, Inc. and its Affiliated Debtor ([D.I. 162](#), filed 6/27/25);

- P. Proposed Findings of Fact, Conclusions of Law, and Order (I) Approving the Disclosure Statement on a Final Basis and (II) Confirming the Revised Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization for Molecular Templates, Inc. and its Affiliated Debtor ([D.I. 163](#), filed 6/27/25);
- Q. DIP Lender's Reply to Objection of United States Trustee to Debtors' Motion for Entry of an Order (I) Approving the Combined Disclosure Statement and Chapter 11 Plan of Reorganization of Molecular Templates, Inc. and its Affiliate Debtor on an Interim Basis; (II) Establishing Solicitation and Tabulation Procedures; (III) Approving the Form of Ballots and Solicitation Materials; (IV) Establishing the Voting Record Date; (V) Fixing the Date, Time, and Place for the Confirmation Hearing and the Deadline for Filing Objections Thereto; and (VI) Granting Related Relief ([D.I. 164](#), filed 6/27/25);
- R. **Debtors' Reply in Support of Confirmation of the Revised Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization of Molecular Templates, Inc. and Its Affiliate Debtor ([D.I. 167](#), filed 6/30/25); and**
- S. **Motion of Debtors for Leave to File Debtors' Reply in Support of Confirmation of the Revised Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization for Molecular Templates, Inc. and Its Affiliated Debtor ([D.I. 168](#), filed 6/30/25).**

Status: The Debtors have resolved the informal comments with the SEC and the DOJ. This matter is going forward.

MATTER UNDER CERTIFICATION

- 2. Debtors' Second Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to (A) Reject Certain Unexpired Leases *Nunc Pro Tunc* to the Petition Date, and (B) Abandon Any Personal Property That Remains at Leased Premises, and (II) Granting Related Relief ([D.I. 148](#), filed 6/17/25).

Objection Deadline: June 24, 2025, at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. Certificate of No Objection Regarding Debtors' Second Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to (A) Reject Certain Unexpired Leases *Nunc Pro Tunc* to the Petition Date, and (B) Abandon Any Personal Property That Remains at Leased Premises, and (II) Granting Related Relief ([D.I. 165](#), filed 6/30/25).

Status: On June 30, 2025, the Debtors submitted a certification of no objection with respect to this matter. Accordingly, a hearing on this matter is no longer necessary unless the Court directs otherwise.

Dated: June 30, 2025
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Luke Brzozowski

Eric D. Schwartz (No. 3134)

Andrew R. Remming (No. 5120)

Luke Brzozowski (No. 7377)

1201 N. Market Street, 16th Floor

Wilmington, Delaware 19801

Telephone: (302) 658-9200

Facsimile: (302) 658-3989

Email: eschwartz@morrisnichols.com

aremming@morrisnichols.com

lbrzozowski@morrisnichols.com

Counsel to the Debtors and Debtors in Possession