

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

In re:

MOLECULAR TEMPLATES, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10739 (BLS)

(Jointly Administered)

**Objection Deadline:**

**August 20, 2025 at 4:00 p.m. (ET)**

**Hearing Date:**

**September 11, 2025 at 9:30 a.m. (ET)**

**FIRST INTERIM FEE APPLICATION OF MORRIS, NICHOLS, ARSHT &  
TUNNELL LLP, AS BANKRUPTCY COUNSEL FOR THE DEBTORS AND  
DEBTORS IN POSSESSION, FOR ALLOWANCE OF COMPENSATION AND  
FOR REIMBURSEMENT OF ALL ACTUAL AND NECESSARY EXPENSES  
INCURRED FOR THE PERIOD  
APRIL 20, 2025 THROUGH AND INCLUDING JUNE 30, 2025**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (D.I. 96) (the “Interim Compensation Procedures Order”), Morris, Nichols, Arsht & Tunnell LLP (“Morris Nichols”) hereby submits its first interim fee application, as bankruptcy counsel for the debtors and debtors in possession in the above-captioned cases (the “Debtors”), for allowance of compensation and reimbursement of all actual and necessary expenses incurred for the period of April 20, 2025, through and including June 30, 2025 (the “Application Period”). **Exhibits A, B, and C**, attached hereto, contain certain schedules pursuant to the Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases (the “UST Guidelines”).

<sup>1</sup> 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 Liquidating Trustee’s mailing address is: 124 Washington Street, Ste. 101 Foxboro, MA 02035. All Court filings can be accessed at: <https://www.veritaglobal.net/MolecularTemplates>.



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In addition, Morris Nichols respectfully states as follows to address the questions set forth under paragraph C.5 of the UST Guidelines:

- a. Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain. **No.**
- b. If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client? **Not applicable.**
- c. Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case? **No.**
- d. Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.). If so, please quantify by hours and fees. **No. Morris Nichols reserves the right to seek such fees in subsequent applications.**
- e. Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees. **No.**
- f. If the fee application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? and (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458? **Not applicable.**

Morris Nichols seeks approval for the following fee applications that were filed in the Application Period:

Fee Application Filing Date, Docket No.	Period Covered By Application	Total Fees Requested	Total Expenses Requested	Certification of No Objection, Filing Date, Docket No.	Amount of Fees Allowed (80%)	Amount of Expenses Allowed (100%)	Amount of Holdback Fees Sought
6/11/2025 D.I. 143	4/20/25-4/30/25	\$192,797.50	\$5,062.80	7/2/2025 D.I. 180	\$154,238.00	\$5,062.80	\$38,559.50
6/27/2025 D.I. 158	5/1/25-5/31/25	\$361,692.50	\$2,170.40	7/18/2025 D.I. 193	\$289,354.00	\$2,170.40	\$72,338.50
7/21/2025 D.I. 200	6/1/25-6/30/25	\$369,493.00	\$1,962.88	Pending	\$0.00	\$0.00	\$75,861.48
<b>TOTAL</b>		<b>\$923,983.00</b>	<b>\$9,196.08</b>		<b>\$443,592.00</b>	<b>\$7,233.20</b>	<b>\$186,759.48</b>

WHEREFORE, Morris Nichols, in accordance with the Interim Compensation Procedures Order, respectfully requests that the Court approve the full amount of fees and expenses requested in the above-referenced fee applications, payment by the Debtors of the amounts requested in such fee applications in full, and such other and further relief as is just and proper.

Dated: July 31, 2025  
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

/s/ Andrew R. Remming

Eric D. Schwartz (No. 3134)  
Andrew R. Remming (No. 5120)  
Luke Brzozowski (No. 7377)  
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*Counsel to the Debtors and Debtors in Possession*

**INTERIM COMPENSATION BY PROFESSIONAL****MOLECULAR TEMPLATES, INC., *et al.***  
**(Case No. 25-10739 (BLS))****April 20, 2025 through June 30, 2025**

<b>Name of Professional</b>	<b>Position of the Applicant, Area of Expertise, Number of Years in that Position, Year of Obtaining License to Practice</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Eric D. Schwartz	Partner/Bankruptcy. Partner since 2002. Joined firm as an associate in 1999. Member of the DE Bar since 1992.	1,525	163.3	249,032.50
Matthew B. Harvey	Partner/Bankruptcy. Partner since 2020. Joined firm as associate from 2008 to Sept. 2013; rejoined the firm as an associate in Nov. 2014. Member of the DE Bar since 2008.	1,295	0.7	906.50
Andrew R. Remming	Partner/Bankruptcy. Partner since 2016. Joined firm as an associate in 2008. Member of the DE Bar since 2008.	1,295	196.3	254,208.50
Tarik J. Haskins	Partner/Commercial Litigation. Partner since 2012. Joined firm as an associate in 2006. Member of the DE Bar since 2003.	1,295	14.2	18,389.00
Todd A. Flubacher	Partner/Trust Law. Partner since 2008. Joined firm as an associate in 1999. Member of the DE Bar since 1999.	1,040	2.1	2,184.00
Daniel B. Butz	Senior Counsel/Bankruptcy. Joined the firm as an associate in 2002. Member of the DE Bar since 2002.	1,095	0.1	109.50
Brenna A. Dolphin	Special Counsel/Bankruptcy. Joined the firm as special counsel in 2023. Member of the DE Bar since 2011.	1,025	94.4	96,760.00
Kelly A. Miranda	Associate/Commercial. Joined the firm as an associate in 2018. Member of the DE Bar since 2018.	885	0.6	531.00
Scott D. Jones	Associate/Bankruptcy. Joined the firm as an associate in 2023. Member of the DE Bar since 2019.	855	1.7	1,453.50

<b>Name of Professional</b>	<b>Position of the Applicant, Area of Expertise, Number of Years in that Position, Year of Obtaining License to Practice</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Echo Qian	Associate/Bankruptcy. Joined the firm as an associate in 2023. Member of the DE Bar since 2023.	730	0.5	365.00
Austin Park	Associate/Bankruptcy. Joined the firm as an associate in 2023. Member of the DE Bar since 2023.	675	124.7	84,172.50
Jake Rauchberg	Associate/Bankruptcy. Joined the firm as an associate in 2024. Member of the PA Bar since 2023	675	69.3	46,777.50
Casey B. Sawyer	Associate/Bankruptcy. Joined the firm as an associate in 2023. Member of the DE Bar since 2023.	675	0.1	67.50
Staats Smith	Associate/Corporate Counseling. Joined the firm as an associate in 2023. Member of the DE Bar since 2023.	675	6.1	4,117.50
Luke Brzozowski	Associate/Bankruptcy. Joined the firm as an associate in 2024. Member of the DE Bar since 2024.	625	230.8	144,250.00
Nicholas Stackhouse	Summer Associate	625	1.6	1,000.00
Desiree M. Vale	Paralegal	435	9.0	3,915.00
John J. Lawrence	Paralegal	435	27.1	11,788.50
Radha Chevli	Paralegal	435	2.1	913.50
Amy Pellegrino	Legal Assistant	385	0.4	154.00
Marie Reed	Legal Assistant	385	6.3	2,425.50
Valerie Walker	Legal Assistant	385	1.2	462.00
<b>Total</b>		<b>969.96</b>	<b>952.6</b>	<b>\$923,983.00</b>
<b>BLENDED RATE: \$969.96</b>				
<b>ATTORNEY BLENDED RATE: \$997.60</b>				

**INTERIM COMPENSATION BY PROJECT CATEGORY****MOLECULAR TEMPLATES, INC., *et al.***  
**(Case No. 25-10739 (BLS))****April 20, 2025 through June 30, 2025**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration	8.1	5,897.50
Automatic Stay Matters	0.4	332.00
Creditor Communications and Meetings	10.7	11,279.50
Fee Applications (MNAT - Filing)	26.2	19,206.00
Fee Applications (Others - Filing)	3.7	2,413.50
Executory Contracts/Unexpired Leases	23.8	20,247.00
Other Contested Matters	2.1	2,412.50
Employee Matters	0.7	328.50
Financing Matters/Cash Collateral	81.7	87,663.50
Tax Matters	8.4	9,269.00
Insurance Matters	8.9	9,743.50
Vendor/Supplier Matters	1.8	1,567.00
Court Hearings	72.3	62,941.50
Claims Objections and Administration	27.6	24,104.00
Plan and Disclosure Statement	446.5	447,897.00
Professional Retention (MNAT - Filing)	15.4	12,175.50
Professional Retention (Others - Filing)	63.2	62,992.00
General Corporate Matters (including Corporate Governance)	18.4	17,112.00
General Case Strategy	70.0	63,728.00
Schedules/SOFA/U.S. Trustee Reports	52.6	51,638.00
Intellectual Property and Asset Review	10.1	11,035.50
<b>TOTAL</b>	<b>952.6</b>	<b>\$923,983.00</b>

**INTERIM EXPENSE SUMMARY****MOLECULAR TEMPLATES, INC., *et al.***  
**(Case No. 25-10739 (BLS))****April 20, 2025 through June 30, 2025**

<b>Expense Category</b>	<b>Total Expenses</b>
Pacer	275.30
In-House Printing - black & white	2,054.30
In-House Printing - color	1,985.60
Courier/Delivery Service	137.00
Transcripts	631.80
Messenger Service	30.00
Court Costs	3,526.00
Non-Delaware Registered Agent Services	474.00
Computer Research - Westlaw	82.08
<b>Grand Total Expenses</b>	<b>9,196.08</b>

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

In re:

MOLECULAR TEMPLATES, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10739 (BLS)

(Jointly Administered)

**Objection Deadline:**  
**August 20, 2025 at 4:00 p.m. (ET)**

**Hearing Date:**  
**September 11, 2025 at 9:30 a.m. (ET)**

**NOTICE OF FILING OF FEE APPLICATION**

**PLEASE TAKE NOTICE** that today, Morris, Nichols, Arsht & Tunnell LLP (the “Professional”) filed the attached *First Interim Fee Application of Morris, Nichols, Arsht & Tunnell LLP, as Bankruptcy Counsel for the Debtors and Debtors In Possession, for Allowance of Compensation and for Reimbursement of All Actual and Necessary Expenses Incurred for the Period April 20, 2025, Through and Including June 30, 2025* (the “Fee Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Fee Application must be made in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (D.I. 96) (the “Interim Compensation Order”) and served no later than **August 20, 2025 at 4:00 p.m. (Eastern Time)** (the “Objection Deadline”) upon on the following parties (the “Fee Notice Parties”):

- (i) the applicant, Morris, Nichols, Arsht & Tunnell LLP, 1201 North Market Street, 16th Floor, Wilmington, DE 19801, Attn: Eric D. Schwartz (eschwartz@morrisnichols.com), and Andrew R. Remming (aremming@morrisnichols.com);
- (ii) the Debtors, c/o Molecular Templates, Inc., 123 Washington Street, Suite 101, Foxboro, MA 20235, Attn: Craig Jalbert (cjalbert@vplc.com);
- (iii) counsel to K2 Health Ventures LLC, (i) Sidley Austin LLP, 1999 Avenue of the Stars, Floor 17, Los Angeles CA 90067, Attn: Samuel Newman (sam.newman@sidley.com) and (ii) Polsinelli PC, 222 Delaware Avenue,

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<sup>1</sup> 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>.



Suite 1101, Wilmington, DE 19801, Attn: Christopher A. Ward (cward@polsinelli.com); and

- (iv) the U.S. Trustee, Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801 Attn: Jane M. Leamy (jane.m.leamy@usdoj.gov).

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Fee Application (the “Hearing”) before the Honorable Brendan L. Shannon, United States Bankruptcy Court Judge, in the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th floor, Courtroom #1, Wilmington, Delaware 19801, will take place on **September 11, 2025 at 9:30 a.m.** If the Hearing is to be held by Zoom videoconference, instructions to appear by Zoom will be provided in the agenda prior to the Hearing.

**PLEASE TAKE FURTHER NOTICE** that only objections made in writing and timely filed and received, in accordance with the procedures above, will be considered by the court at the Hearing.

**PLEASE TAKE FURTHER NOTICE** that if you fail to respond in accordance with this notice, the court may grant the relief requested in the Fee Application without further notice or hearing.

Dated: July 31, 2025  
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

/s/ Andrew R. Remming

Eric D. Schwartz (No. 3134)  
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*Counsel to the Debtors and Debtors in Possession*

**EXHIBIT A****Customary and Comparable Compensation Disclosures**

Morris Nichols's hourly rates for bankruptcy services are comparable to the hourly rates charged in complex chapter 11 cases by comparably skilled bankruptcy attorneys. In addition, Morris Nichols' hourly rates for bankruptcy services are comparable to the rates charged by Morris Nichols, and by comparably skilled practitioners in other firms, for complex corporate and litigation matters, whether in court or otherwise, regardless of whether a fee application is required.

The blended hourly rate for all Morris Nichols timekeepers who worked on these cases is approximately the same as the firm's blended rate for all timekeepers over a Comparable Period (defined below). In particular, the blended hourly rate for all Morris Nichols timekeepers (including both professionals and paraprofessionals) who billed to matters excluding chapter 11 representations (collectively, the "Non-Chapter 11 Matters")<sup>1</sup> during the period beginning April 20, 2025 and ending on June 30, 2025 (the "Comparable Period") was, in the aggregate, approximately \$913.36.<sup>2</sup> By comparison, the blended hourly rate for all Morris Nichols timekeepers (including both professionals and paraprofessionals) who worked on these cases during the Application Period was, in the aggregate, \$969.96.

The following table shows blended hourly rates by category of professional and paraprofessional (rounded to the nearest dollar) in the Application and in comparison to the blended hourly rate for Morris Nichols' non-Chapter 11 matters:

<b>Position at Morris Nichols</b>	<b>Blended Hourly Rate for Application Period</b>	<b>Blended Hourly Rate Non-Chapter 11 Matters</b>
Partner	\$1,393	\$1,177
Senior Counsel	\$1,095	\$1,010
Special Counsel	\$1,025	\$886
Associate	\$649	\$686
Paralegal	\$435	\$317
Legal Assistant	\$385	\$377

<sup>1</sup> It is the nature of Morris Nichols's practice that certain non-bankruptcy engagements require the advice and counsel of professionals and paraprofessionals who work primarily within Morris Nichols's Business Reorganization and Restructuring Group. Accordingly, Non-Chapter 11 Matters consist of matters for which Morris Nichols timekeepers represented a client in a matter *other than* court-approved chapter 11 representations. The Non-Chapter 11 Matters include time billed by Morris Nichols timekeepers who work within Morris Nichols's Business Reorganization and Restructuring Group.

<sup>2</sup> Morris Nichols calculated the blended rate for Non-Chapter 11 Matters by dividing the *total dollar amount* billed by Morris Nichols timekeepers to Non-Chapter 11 Matters during the Comparable Period by the *total number of hours* billed by such Morris Nichols timekeepers to Non-Chapter 11 Matters during the same period.

**Exhibit B**

**Interim Application Summary**

**Cover Sheet of Fee Application (UST Guidelines Exh. E)**

<b>Interim Application Period Summary</b>	
Name of Applicant	Morris, Nichols, Arsht & Tunnell LLP
Name of Client	MOLECULAR TEMPLATES, INC., <i>et al.</i>
Time period covered by Interim Application	April 20, 2025 through June 30, 2025
Total compensation sought during Application Period	\$923,983.00
Total expenses sought during Application Period	\$9,196.08
Petition Date	April 20, 2025
Retention Date	May 16, 2025, <i>nunc pro tunc</i> to April 20, 2025
Date of order approving employment	May 16, 2025
Total allowed compensation paid to date	\$443,592.00
Total allowed expenses paid to date	\$7,233.20
Total compensation approved by interim order to date	\$0.00
Total expenses approved by interim order to date	\$0.00
Blended rate in the Interim Application for all partners	\$1,393.31
Blended rate in the Interim Application for all attorneys	\$997.60
Blended rate in the Interim Application for all timekeepers	\$969.96
Compensation sought in the Interim Application already paid pursuant to a monthly compensation certificate but not yet allowed by interim order	\$443,592.00

<b>Interim Application Period Summary</b>	
Expenses sought in the Interim Application already paid pursuant to a monthly compensation certificate but not yet allowed by interim order	\$7,233.20
Number of professionals included in Interim Application	22
If applicable, number of professionals in the Interim Application not included in staffing plan approved by client	See Exhibit C
If applicable, difference between fees budgeted and compensation sought for the Application Period	N/A
Number of professionals billing fewer than 15 hours to the case during the Application Period	16
Are any rates higher than those approved or disclosed at retention	No.

**Exhibit C****Staffing Plan Interim Application Period Staffing Plan**

<b>Category of Timekeeper</b>	<b>Number of Timekeepers Expected to Perform Work Across Matters During the Budget Period</b>	<b>Number of Timekeepers Actually Performing Work During the Budget Period</b>	<b>Projected Average Hourly Rate</b>	<b>Actual Average Hourly Rate</b>
Partner	2	5	\$1,410	\$1,393.31
Senior Counsel	1	1	\$1,075	\$1,075.00
Special Counsel	1	1	\$1,025	\$1,025.00
Associate	2	9	\$740	\$649.37
Other Professionals	4	6	\$435	\$426.43