

**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)

(Joint Administration Requested)

**NOTICE OF HEARING TO CONSIDER FIRST DAY MOTIONS**

**This proceeding will be conducted in person in Courtroom 1 and via Zoom.**

**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 should be completed at least 1 hour prior to the start of the hearing, unless otherwise noticed, using the eCourtAppearances tool available on the Court’s website.**

**PLEASE TAKE NOTICE** that on April 20, 2025, the debtors and debtors in possession in the above-captioned chapter 11 case (the “Debtors”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), and related motions with the United States Bankruptcy Court for the District of Delaware.

**PLEASE TAKE FURTHER NOTICE** that the Debtors continue to manage their assets as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

**PLEASE TAKE FURTHER NOTICE** that a hearing (the “First Day Hearing”) will be held in person and via Zoom, before The Honorable Brendan L. Shannon, United States

<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.



Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, located at 824 North Market Street, 6th Floor, Courtroom #1, Wilmington, Delaware 19801 on **April 22, 2025, at 9:30 a.m. (ET)** on the following motions requesting certain “first day” relief (the “First Day Motions”), which have been filed by the Debtors in connection with its chapter 11 cases.

<b>D.I. No.</b>	<b>First Day Motions</b>
<a href="#"><u>3</u></a>	Debtors’ Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases
<a href="#"><u>5</u></a>	Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue Their Existing Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Their Bank Accounts and Existing Business Forms, (D) Implement Changes to the Existing Cash Management System as Necessary, and (E) Continue Ordinary Course Intercompany Transactions; (II) Waiving the Requirements of 11 U.S.C. § 345(b) and the U.S. Trustee’s Operating Guidelines; and (III) Granting Related Relief
<a href="#"><u>6</u></a>	Debtors’ Motion for Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of Certain Critical Vendors and (II) Granting Related Relief
<a href="#"><u>10</u></a>	Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses, and (II) Granting Related Relief
<a href="#"><u>11</u></a>	Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Continue Insurance Programs and Pay All Obligations with Respect Thereto; and (II) Granting Related Relief
<a href="#"><u>12</u></a>	Motion of the Debtors for Entry of Interim and Final Orders Establishing Notification and Hearing Procedures for, and Approving Restrictions on, Certain Transfers of, and Declarations of Worthlessness with Respect to, Interests in the Debtors’ Estates
<a href="#"><u>13</u></a>	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
<a href="#"><u>14</u></a>	Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to the Prepetition Lender, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing and (VI) Granting Related Relief
<a href="#"><u>17</u></a>	Debtors’ Application for Authorization to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Claims and Noticing Agent Effective as of the Petition Date

Copies of the First Day Motions are available free of charge at <https://www.veritaglobal.net/MolecularTemplates>. Copies of the First Day Motions may also be inspected in the offices of the Clerk of the Bankruptcy Court during normal business hours or downloaded from the Bankruptcy Court's website at [www.deb.uscourts.gov](http://www.deb.uscourts.gov). Please note that prior registration with the PACER Service Center and payment of a fee may be required to access such documents. Parties in interest may sign up for a PACER account by visiting the PACER website at <http://pacer.psc.uscourts.gov> or by calling (800) 676-6856.

Dated: April 21, 2025  
Wilmington, Delaware

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

/s/ Andrew R. Remming

Eric D. Schwartz (No. 3134)

Andrew R. Remming (No. 5120)

Austin T. Park (No. 7247)

Jake A. Rauchberg (No. 7444)

1201 N. Market Street, 16th Floor

Wilmington, Delaware 19801

Telephone: (302) 658-9200

Facsimile: (302) 658-3989

Email: [eschwartz@morrisnichols.com](mailto:eschwartz@morrisnichols.com)

[aremming@morrisnichols.com](mailto:aremming@morrisnichols.com)

[apark@morrisnichols.com](mailto:apark@morrisnichols.com)

[jrauchberg@morrisnichols.com](mailto:jrauchberg@morrisnichols.com)

*Proposed Counsel to the Debtors and Debtors in Possession*