

**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)

(Joint Administration Requested)

**AMENDED² NOTICE OF (I) FILING OF CHAPTER 11 PETITIONS AND RELATED
DOCUMENTS AND (II) AGENDA FOR HEARING SCHEDULED FOR
APRIL 22, 2025, AT 9:30 A.M. (EASTERN TIME)**

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 voluntary petitions 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. The Debtors are debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The automatic stay of Section 362(a) of the Bankruptcy Code is in effect.

PLEASE TAKE FURTHER NOTICE that a hearing with respect to the following first day motions (collectively, the "First Day Motions"), to the extent set forth below, is scheduled for **April 22, 2025, at 9:30 a.m. (Eastern Time)** (the "First Day Hearing") before The Honorable Brendan L. Shannon, United States Bankruptcy Judge for the District of Delaware.

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.



PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Motions may be made at the First Day Hearing.

PETITIONS

1. Voluntary Petitions (see attached **Exhibit A**).

Related Documents:

- A. Notice of Hearing to Consider First Day Motions ([D.I. 23](#), filed 4/21/25).

DECLARATION IN SUPPORT OF FIRST DAY MOTIONS

2. Declaration of Craig Jalbert in Support of Debtors' Chapter 11 Petitions and First Day Motions ([D.I. 15](#), filed 4/21/25).

Related Document:

- A. Notice of Filing of Additional Schedule to Declaration of Craig Jalbert in Support of Debtors' Chapter 11 Petitions and First Day Motions (D.I. 15) ([D.I. 18](#), filed 4/21/25).

MATTERS GOING FORWARD

3. Debtors' Motion for Entry of an Order Authorizing the Joint Administration of Debtors' Chapter 11 Cases ([D.I. 3](#), filed 4/21/25).

Status: This matter is going forward.

4. 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 ([D.I. 5](#), filed 4/21/25).

Status: This matter is going forward.

5. Debtors' Motion for Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of Certain Critical Vendors and (II) Granting Related Relief ([D.I. 6](#), filed 4/21/25).

Status: This matter is going forward.

6. 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 ([D.I. 10](#), filed 4/21/25).

Status: This matter is going forward.

7. 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 ([D.I. 11](#), filed 4/21/25).

Status: This matter is going forward.

8. 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 ([D.I. 12](#), filed 4/21/25).

Status: This matter is going forward.

9. 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 ([D.I. 13](#), filed 4/21/25).

Status: This matter is going forward.

10. 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 ([D.I. 14](#), filed 4/21/25).

Related Documents:

- A. Declaration of Brian Ayers in Support of 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 (V) Granting Related Relief ([D.I. 16](#), filed 4/21/25); and
- B. Notice of Amended Declaration of Brian Ayers in Support of 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 (V) Granting Related Relief ([D.I. 29](#), filed 4/22/25).**

Status: This matter is going forward.

11. 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 ([D.I. 17](#), filed 4/21/25).

Status: This matter is going forward.

Dated: April 22, 2025
Wilmington, Delaware

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Proposed Counsel to the Debtors and Debtors in Possession

Exhibit A

Debtor	Case No.
Molecular Templates, Inc.	<u>25-10739 (BLS)</u>
Molecular Templates Opco, Inc.	<u>25-10740 (BLS)</u>