

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)

**AMENDED<sup>2</sup> NOTICE OF AGENDA FOR HEARING SCHEDULED FOR  
MAY 21, 2025, AT 2:00 P.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.**

**RESOLVED MATTERS**

1. Debtors' First 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. 22](#), filed 4/21/25).

Objection Deadline: May 5, 2025, at 4:00 p.m. (ET).

Responses Received: None.

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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>.

<sup>2</sup> Amended items in **bold**.



Related Documents:

- A. Notice of Debtors' First 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. 44](#), filed 4/22/25);
- B. Certificate of No Objection Regarding Debtors' First 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. 64](#), filed 5/6/25); and
- C. 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. 68](#), entered 5/7/25).

Status: An order has been entered. No hearing is necessary.

- 2. Motion of Debtors for Entry of an Order (I) Establishing Certain Bar Dates for Filing Proofs of Claim Against the Debtors, and (II) Granting Related Relief, Including Notice and Filing Procedures ([D.I. 26](#), filed 4/21/25).

Objection Deadline: May 5, 2025, at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. Omnibus Notice of Motions and Hearing Thereon ([D.I. 47](#), filed 4/22/25);
- B. Certificate of No Objection Regarding Motion of Debtors for Entry of an Order (I) Establishing Certain Bar Dates for Filing Proofs of Claim Against the Debtors, and (II) Granting Related Relief, Including Notice and Filing Procedures ([D.I. 65](#), filed 5/6/25); and
- C. Order (I) Establishing Certain Bar Dates for Filing Proofs of Claim Against the Debtors, and (II) Granting Related Relief, Including Notice and Filing Procedures ([D.I. 69](#), entered 5/7/25).

Status: An order has been entered. No hearing is necessary.

- 3. Debtor's Motion for Entry of an Order Extending Time to File Schedules or Assets and Liabilities and Statements of Financial Affairs ([D.I. 27](#), filed 4/21/25).

Objection Deadline: May 5, 2025, at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. Omnibus Notice of Motions and Hearing Thereon ([D.I. 47](#), filed 4/22/25);
- B. Certificate of No Objection Regarding Debtors' Motion for Entry of an Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs ([D.I. 66](#), filed 5/6/25); and
- C. Order Approving Motion to Extend Deadline to File Schedules or Provide Required Information ([D.I. 70](#), entered 5/7/25).

Status: An order has been entered. No hearing is necessary.

- 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).

Objection Deadline: May 8, 2025, at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. Interim Order (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. 35](#), entered 4/22/25);
- B. Omnibus Notice of First Day Motions and Final Hearing Thereon ([D.I. 46](#), filed 4/22/25); and
- C. Final Order (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. 81](#), entered 5/14/25).

Status: An order has been entered. No hearing is necessary.

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).

Objection Deadline: May 8, 2025, at 4:00 p.m. (ET)

Responses Received: None.

Related Documents:

- A. Interim Order (I) Authorizing Payment of Prepetition Claims of Certain Critical Vendors and (II) Granting Related Relief ([D.I. 36](#), entered 4/22/25);
- B. Omnibus Notice of First Day Motions and Final Hearing Thereon ([D.I. 46](#), filed 4/22/25); and
- C. Final Order (I) Authorizing Payment of Prepetition Claims of Certain Critical Vendors and (II) Granting Related Relief ([D.I. 80](#), entered 5/14/25).

Status: An order has been entered. No hearing is necessary.

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).

Objection Deadline: May 8, 2025, at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. Interim Order (I) Authorizing the Debtors to Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses, and (II) Granting Related Relief ([D.I. 37](#), entered 4/22/25);
- B. Omnibus Notice of First Day Motions and Final Hearing Thereon ([D.I. 46](#), filed 4/22/25); and
- C. Final Order (I) Authorizing the Debtors to Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses, and (II) Granting Related Relief ([D.I. 82](#), entered 5/14/25).

Status: An order has been entered. No hearing is necessary.

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).

Objection Deadline: May 8, 2025, at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. Interim Order (I) Authorizing Debtors to Continue Insurance Programs and Pay All Obligations with Respect Thereto; and (II) Granting Related Relief ([D.I. 38](#), entered 4/22/25);
- B. Omnibus Notice of First Day Motions and Final Hearing Thereon ([D.I. 46](#), filed 4/22/25); and
- C. Final Order (I) Authorizing Debtors to Continue Insurance Programs and Pay All Obligations with Respect Thereto; and (II) Granting Related Relief ([D.I. 83](#), entered 5/14/25).

Status: An order has been entered. No hearing is necessary.

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).

Objection Deadline: May 8, 2025, at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. Interim Order 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. 39](#), entered 4/22/25);
- B. Notice of (I) Disclosure Procedures Applicable to Certain Holders of Common Stock, Disclosure Procedures for Transfers of Common Stock, and Declarations of Worthlessness with Respect to Interests in the Debtors' Estate, and (II) Final Hearing on the Application Thereon ([D.I. 45](#), filed 4/22/25); and
- C. Final Order 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. 84](#), entered 5/14/25).

Status: An order has been entered. No hearing is necessary.

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).

Objection Deadline: May 8, 2025, at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. 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 ([D.I. 40](#), entered 4/22/25);
- B. Omnibus Notice of First Day Motions and Final Hearing Thereon ([D.I. 46](#), filed 4/22/25); and
- C. 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 ([D.I. 85](#), entered 5/14/25).

Status: An order has been entered. No hearing is necessary.

10. Debtors' Application for Entry of an Order Authorizing Retention and Employment of Morris, Nichols, Arsht & Tunnell LLP as Bankruptcy Counsel for the Debtors *Nunc Pro Tunc* to the Petition Date ([D.I. 58](#), filed 5/2/25).

Objection Deadline: May 14, 2025, at 4:00 p.m. (ET)

Responses Received: None.

Related Documents:

- A. Certificate of No Objection Regarding Debtors' Application for Entry of an Order Authorizing Retention and Employment of Morris, Nichols, Arsht & Tunnell LLP as Bankruptcy Counsel for the Debtors *Nunc Pro Tunc* to the Petition Date ([D.I. 87](#), filed 5/15/25); and

- B. Order Approving Application to Employ Morris, Nichols, Arsht & Tunnell LLP as Bankruptcy Counsel for the Debtors ([D.I. 90](#), entered 5/16/25).

Status: An order has been entered. No hearing is necessary.

11. Debtors' Motion for an Order Authorizing the Retention and Employment of Professionals Used in the Ordinary Course Effective as of the Petition Date ([D.I. 72](#), filed 5/7/25).

Objection Deadline: May 14, 2025, at 4:00 p.m. (ET)

Responses Received: None.

Related Documents:

- A. Certificate of No Objection Regarding Debtors' Motion for an Order Authorizing the Retention and Employment of Professionals Used in the Ordinary Course Effective as of the Petition Date ([D.I. 88](#), filed 5/15/25); and
- B. Order Authorizing the Retention and Employment of Professionals Used in the Ordinary Course Effective as of the Petition Date ([D.I. 91](#), entered 5/16/25).

Status: An order has been entered. No hearing is necessary.

#### **MATTERS UNDER CERTIFICATION**

12. Debtors' Application for Authorization to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor Effective as of the Petition Date ([D.I. 57](#), filed 5/2/25).

Objection Deadline: May 14, 2025, at 4:00 p.m. (ET).

Responses Received:

- A. Informal comments from the Office of the United States Trustee (the "[U.S. Trustee](#)").

Related Documents:

- A. Certification of Counsel Regarding Debtors' Application for Authorization to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor Effective as of the Petition Date ([D.I. 94](#), filed 5/19/25);  
**and**
- B. **Order Approving Application to Employ Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor** ([D.I. 97](#), entered 5/19/25).

Status: An order has been entered. No hearing is necessary.

13. Debtors' Motion for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals ([D.I. 71](#), filed 5/7/25).

Objection Deadline: May 14, 2025, at 4:00 p.m. (ET).

Responses Received:

- A. Informal comments from the U.S. Trustee.

Related Documents:

- A. Certification of Counsel Regarding Debtors' Motion for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals ([D.I. 92](#), filed 5/16/25); **and**
- B. Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals ([D.I. 96](#), entered 5/19/25).**

**Status: An order has been entered. No hearing is necessary.**

#### **MATTERS GOING FORWARD**

14. 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).

Objection Deadline: May 8, 2025, at 4:00 p.m. (ET).

Responses Received: None at this time.

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);
- 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);

- C. Interim Order (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. 56](#), entered 4/28/25); and
- D. Notice of Filing of Proposed Final Order (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. 103](#), filed 5/21/25).

**Status: A revised proposed final order has been filed. This matter is going forward.**

- 15. 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).

Objection Deadline: May 7, 2025, at 4:00 p.m. (ET); extended to May 14, 2025, at 4:00 p.m. (ET) for the U.S. Trustee; extended to May 16, 2025, at 4:00 p.m. (ET) for the Securities and Exchange Commission (the "SEC").

Responses Received:

- A. Informal comments received from the U.S. Trustee;
- B. Informal comments received from the SEC; and
- C. 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. 86](#), filed 5/14/25).

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. 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); and
- E. Statement of DIP Lender in Support of Confirmation of Plan ([D.I. 99](#), filed 5/20/25).

Status: This matter is going forward.

Dated: May 21, 2025  
Wilmington, Delaware

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

/s/ Austin T. Park

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*Counsel to the Debtors and Debtors in Possession*