

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

GRITSTONE BIO, INC.,¹

Debtor.

Chapter 11

Case No. 24-12305 (KBO)

Related Docket No. 483

**CERTIFICATION OF NO OBJECTION REGARDING DEBTOR'S FIRST OMNIBUS
OBJECTION (SUBSTANTIVE) TO CERTAIN CLAIMS
(RECLASSIFICATION CLAIMS)**

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading has been received on the *Debtor's First Omnibus Objection (Substantive) to Certain Claims (Reclassification Claims)* [Docket No. 483] (the "Omnibus Objection") filed on February 28, 2025. Pursuant to the *Notice of Debtor's First Omnibus Objection (Substantive) to Certain Claims (Reclassification Claims)* [Docket No. 483-1] objections to the Omnibus Objection were to be filed and served no later than March 21, 2025, at 4:00 p.m. (ET). The undersigned further certifies that the Court's docket has been reviewed in this case and no answer, objection or other responsive pleading to the Omnibus Objection appears thereon.

Accordingly, it is hereby respectfully requested that the proposed order attached hereto as **Exhibit A** be entered at the Court's convenience.

¹ The Debtor's mailing address is 4698 Willow Road, Pleasanton, CA 94588, and the last four digits of the Debtor's federal tax identification number is 9534.



241230525041400000000001

Dated: April 11, 2025

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill

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EXHIBIT A

Proposed Order

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

In re:

GRITSTONE BIO, INC.,¹

Debtor.

Chapter 11

Case No. 24-12305 (KBO)

Related Docket No. 483

**ORDER SUSTAINING DEBTOR’S FIRST OMNIBUS OBJECTION
(SUBSTANTIVE) TO CERTAIN CLAIMS (RECLASSIFICATION CLAIMS)**

Upon consideration of the *Debtor’s First Omnibus Objection (Substantive) to Certain Claims (Reclassification Claims)* (the “Objection”)² filed by the above-captioned debtor and debtor in possession (the “Debtor”) for entry of an order (this “Order”) pursuant to section 502 of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007, and Local Rule 3007–1, (a) reclassifying the claims listed on **Schedule 1** to this Order (the “Reclassified Claims”), and (b) reclassifying the claims listed on **Schedule 2** to this Order (the “Reclassified Interests,” and collectively with the Reclassified Claims, the “Reclassification Claims”), all as more fully set forth in the Objection; and the Court having reviewed the Fleming Declaration in support of the Objection; and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157 pursuant to the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that it may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to

¹ The Debtor’s mailing address is 4698 Willow Road, Pleasanton, CA 94588, and the last four digits of the Debtor’s federal tax identification number is 9534.

² Capitalized terms used but not defined in this Order shall have the meanings ascribed to them in the Objection.

28 U.S.C. §§ 1408 and 1409; and notice of the Objection and of the hearing on the Objection was sufficient under the circumstances and in full compliance with the requirements of the Bankruptcy Code, the Bankruptcy Rules and the Local Rules; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on its merits.
3. Each Reclassified Claim identified on Schedule 1 attached hereto is hereby reclassified as a non-priority general unsecured claim as set forth on Schedule 1.
4. Each Reclassified Interest identified on Schedule 2 attached hereto is hereby reclassified as an Equity Interest as set forth on Schedule 2.
5. The Claims Agent is authorized to update the claims register to reflect the relief granted in this Order.
6. Each of the Reclassification Claims and the objections by the Debtor to such Claims, as addressed in the Objection and set forth on Schedule 1 and Schedule 2 attached to this Order, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each of the Reclassification Claims. Any stay of this Order shall apply only to the contested matter that involves such creditor and shall not act to stay the applicability or finality of this Order with respect to the other contested matters covered hereby.

7. Nothing in this Order shall be deemed (i) an admission as to the validity of any claim or interest against the Debtor; (ii) a waiver of the Debtor's or any other party's rights to dispute or otherwise to object to any claim or proof of interest on any grounds or basis; (iii) a promise or requirement to pay any claim; (iv) an implication or admission that any claim is of a type referenced or defined in the Objection; (v) a waiver or limitation of any of the Debtor's rights under the Bankruptcy Code or applicable law, or (vi) to waive or release any right, claim, defense, or counterclaim of the Debtor, or to estop the Debtor from asserting any right, claim, defense, or counterclaim (including setoff).

8. The Debtor and the Claims Agent are authorized to take all actions necessary to effectuate the relief granted in this Order.

9. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

10. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Schedule 1

Debtor's First Omnibus Objection (Substantive) to Certain Claims (Reclassification Claims)

Schedule 1: Reclassified Claims

Claims to be Reclassified								
Asserted Amounts					Reclassified Amounts			
No.	Claimant	Claim Number	Original Amount / Classification		Proposed Amount / Classification		Basis for Objection	
1	Air Energy Group, LLC	11		(U)	\$ 1,561.62	(U)	Claimant asserts no basis for. secured treatment of this claim. The Debtor's books and records do not reflect any secured claim by this claimant and are unaware of any valid basis for a secured claim. As such, the Debtor seeks to reclassify the claim to a non-priority general unsecured claim.	
	c/o Maria Busby			(P)		(P)		
	17 Powder Hill Rd		\$ 1,561.62	(S)		(S)		
	Lincoln, RI 02865			(A)		(A)		
			\$ 1,561.62	(T)	\$ 1,561.62	(T)		
2	Titanium Strategic Legal Solutions PC	138		(U)	\$ 3,087.50	(U)	Claimant asserts an administrative claim for legal services provided to the Debtor. The services were rendered to the Debtor before the Petition Date. As such, the Debtor seeks to reclassify the claim to a non-priority general unsecured claim.	
	Cynthia Yoshimura			(P)		(P)		
	1 Park Plaza Suite 600			(S)		(S)		
	Irvine, CA 92614		\$ 3,087.50	(A)		(A)		
			\$ 3,087.50	(T)	\$ 3,087.50	(T)		

(U) - Unsecured, (P) - Priority, (S) - Secured, (A) - Administrative, (T) - Total

Schedule 2

Debtor's First Omnibus Objection (Substantive) to Certain Claims (Reclassification Claims)

Schedule 2: Reclassified Interests

Claims to be Reclassified					
Asserted Amounts				Reclassified Amounts	
No.	Claimant	Claim Number	Original Amount / Classification	Proposed Amount / Classification	Basis for Objection
1	Bulva, Jeff MD MS FACP	27	\$ 8,892.39 (U)	Equity interest	Claimant asserts a claim based on Claimant's ownership of stock in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.
	15130 Crestone Circle		(P)		
	Rosemount, MN 55068		(S)		
			(A)		
			\$ 8,892.39 (T)		
2	Bulva, Jeff MD MS FACP	61	\$ 8,892.39 (U)	Equity interest	Claimant asserts a claim based on Claimant's ownership of stock in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.
	15130 Crestone Circle		(P)		
	Rosemount, MN 55068		(S)		
			(A)		
			\$ 8,892.39 (T)		
3	Chen, Hueyyu	140	\$ 2,229.50 (U)	Equity interest	Claimant asserts a claim based on Claimant's ownership of stock in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.
	11101 Bryans View Ct		(P)		
	Henrico, VA 23233		(S)		
			(A)		
			\$ 2,229.50 (T)		
4	Costa, Judy Rosario	47	\$ 975.00 (U)	Equity interest	Claimant asserts a claim based on Claimant's ownership of shares in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.
	40 Ashwell Ave		(P)		
	Rocky Hill, CT 06067		(S)		
			(A)		
			\$ 975.00 (T)		
5	DiCarlo, Nicholas	96	\$ 6,712.99 (U)	Equity interest	Claimant asserts a claim based on "shares purchased" in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.
	100 Cabrini Blvd Apt 65		(P)		
	New York, NY 10033		(S)		
			(A)		
			\$ 6,712.99 (T)		
6	Elron, Yoni	40	\$ 1,660.98 (U)	Equity interest	Claimant asserts a claim based on Claimant's purchase of stock in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.
	Hailanot 42/A Street		(P)		
	Hadera, Hefa 3846722		(S)		
			(A)		
			\$ 1,660.98 (T)		

Claims to be Reclassified						
Asserted Amounts				Reclassified Amounts		
No.	Claimant	Claim Number	Original Amount / Classification	Proposed Amount / Classification	Basis for Objection	
7	Estrada, Jose Pomares	83		(U)	Equity interest	Claimant asserts a claim based on Claimant's ownership of shares in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.
	Via Al Mar, Zona Norte. La Boquilla		\$ 3,000.00	(P)		
	Km12 Condominio Laguna Club. Bloque Gu			(S)		
	Cartagena, Bolivar 130007			(A)		
			\$ 3,000.00	(T)		
8	Estrada, Jose Pomares	82		(U)	Equity interest	Claimant asserts a claim based on Claimant's ownership of shares in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.
	Via Al Mar, Zona Norte. La Boquilla		\$ 3,000.00	(P)		
	Km12 Condominio Laguna Club. Bloque Gu			(S)		
	Cartagena, Bolivar 130007			(A)		
			\$ 3,000.00	(T)		
9	Fitch, Eileen C.	106	\$ 65.64	(U)	Equity interest	Claimant asserts a claim based on Claimant's ownership of shares in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.
	102 Campus Dr.			(P)		
	Rochester, NY 14623			(S)		
				(A)		
			\$ 65.64	(T)		
10	Fitch, J. Lee	95	\$ 430.30	(U)	Equity interest	Claimant asserts a claim based on Claimant's ownership of shares in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.
	102 Campus Dr.			(P)		
	Rochester, NY 14623			(S)		
				(A)		
			\$ 430.30	(T)		
11	Grattidge, Bradley T.	55	\$ 1,047,726.54	(U)	Equity interest	Claimant asserts a claim based on "ownership stake" in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.
	643 Los Padres Blvd			(P)		
	Santa Clara, CA 95050-6945			(S)		
				(A)		
			\$ 1,047,726.54	(T)		
12	Joshua D. Kaplan Living Trust	75	\$ 6,803.51	(U)	Equity interest	Claimant asserts a claim based on Claimant's purchase of shares in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.
	1950 NE 188th St.			(P)		
	North Miami Beach, FL 33179			(S)		
				(A)		
			\$ 6,803.51	(T)		
13	McCutchan OD, Howard H.	26	\$ 5,996.44	(U)	Equity interest	Claimant asserts a claim based on Claimant's ownership of shares in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.
	PO Box 715			(P)		
	Harlan, IA 51537			(S)		
				(A)		
			\$ 5,996.44	(T)		

Claims to be Reclassified						
Asserted Amounts				Reclassified Amounts		
No.	Claimant	Claim Number	Original Amount / Classification	Proposed Amount / Classification	Basis for Objection	
14	Montoro, John Michael	112	\$ 5,201.00 (U)	Equity interest	Claimant asserts a claim based on Claimant's ownership of shares in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.	
	119 Blauvelt Avenue		(P)			
	HoHoKus, NJ 07423		(S)			
			(A)			
			\$ 5,201.00 (T)			
15	Nguyen, Minh Hoang Anh	3	\$ 21,150.00 (U)	Equity interest	Claimant asserts a claim based on Claimant's ownership of shares in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.	
	17111 Copper Shore Dr		(P)			
	Houston, TX 77095		(S)			
			(A)			
			\$ 21,150.00 (T)			
16	Nguyen, Minh Hoang Anh	71	(U)	Equity interest	Claimant asserts a claim based on Claimant's ownership of shares in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.	
	17111 Copper Shore Dr		\$ 21,500.00 (P)			
	Houston, TX 77095		(S)			
			(A)			
			\$ 21,500.00 (T)			
17	Nguyen, Minh Hoang Anh	142	(U)	Equity interest	Claimant asserts an administrative expense based on Claimant's ownership of shares in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.	
	17111 Copper Shore Dr		(P)			
	Houston, TX 77095		(S)			
			\$ 21,150.00 (A)			
			\$ 21,150.00 (T)			
18	Patsis, Louiza	65	\$ 3,095.00 (U)	Equity interest	Claimant asserts a claim based on Claimant's ownership of shares in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.	
	87-87 171 Street Apt 7K		(P)			
	Jamacia, NY 11432		(S)			
			(A)			
			\$ 3,095.00 (T)			
19	Pattis, James G.	134	\$ 16,223.83 (U)	Equity interest	Claimant asserts a claim based on "stock purchased" in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.	
	120 Jordan Road		(P)			
	Rockaway, NJ 07866		(S)			
			(A)			
			\$ 16,223.83 (T)			
20	Raaymaker, Jeremy	133	\$ 219.44 (U)	Equity interest	Claimant asserts a claim based on "shares held" in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.	
	2023 107 Ave SW		(P)			
	Calgary, AB T2W 0C4 Canada		(S)			
			(A)			
			\$ 219.44 (T)			

Claims to be Reclassified						
Asserted Amounts				Reclassified Amounts		
No.	Claimant	Claim Number	Original Amount / Classification	Proposed Amount / Classification	Basis for Objection	
21	SIMON FAMILY VENTURES LP	51	\$ 7,870.00 (U)	Equity interest	Claimant asserts a claim based on Claimant's ownership of shares in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.	
	50 CLARK DRIVE		(P)			
	SAN MATEO, CA 94401		(S)			
			(A)			
			\$ 7,870.00 (T)			
22	Simon, Nicholas	52	\$ 18,364.00 (U)	Equity interest	Claimant asserts a claim based on Claimant's ownership of shares in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.	
	50 CLARK DRIVE		(P)			
	SAN MATEO, CA 94401		(S)			
			(A)			
			\$ 18,364.00 (T)			
23	Su, Zhi Xing	137	\$ 98,085.21 (U)	Equity interest	Claimant asserts a claim based on Claimant's ownership of shares in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.	
	157 Pineway Boulevard		(P)			
	Toronto, ON		(S)			
	M2H 1A9 Canada		(A)			
			\$ 98,085.21 (T)			
24	Valluru, Anvita	103	\$ 13,944.82 (U)	Equity interest	Claimant asserts a claim based on Claimant's ownership of shares in the Debtor. Thus, the Debtor seeks to reclassify this claim to an equity interest in the Debtor.	
	7850 Kelly Canyon Pl		(P)			
	Dublin, CA 94568-1395		(S)			
			(A)			
			\$ 13,944.82 (T)			
(U) - Unsecured, (P) - Priority, (S) - Secured, (A) - Administrative, (T) - Total						