

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

GRITSTONE BIO, INC., <sup>1</sup>

Debtor.

Chapter 11

Case No. 24-12305 (KBO)

**Objection Deadline:**

May 13, 2025 at 4:00 p.m. (ET)

**Hearing Date:**

Only in the event necessary

**SUMMARY OF FIFTH MONTHLY APPLICATION OF ARENTFOX SCHIFF  
LLP, COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS, FOR INTERIM ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR SERVICES RENDERED DURING  
THE PERIOD FROM MARCH 1, 2025 THROUGH APRIL 4, 2025**

Name of Applicant:

ArentFox Schiff LLP

Authorized to Provide Professional Services  
to:

Official Committee of Unsecured Creditors

Date of Retention:

December 13, 2024  
(*nunc pro tunc* to October 31, 2024)

Period for which Compensation and  
Reimbursement are sought:

March 1, 2025 through April 4, 2025

Amount of Compensation sought as actual,  
reasonable, and necessary:

\$31,467.50

Amount of Expense Reimbursement sought  
as actual, reasonable, and necessary:

\$0.00

This is a(n):

☒ monthly

☐ interim

☐ final application

The total time expended for fee application preparation is approximately 17.20 hours and the corresponding compensation requested is approximately \$9,314.50.

<sup>1</sup> 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.



2412305250429000000000001

**SUMMARY OF PRIOR FEE APPLICATIONS FILED****Monthly Applications:**

		Total Amount Requested		Approved for Payment via Certificate of No Objection		Total Amount Paid to Date		Holdback Fees Requested
Date Filed/ Docket No.	Period Covered	Fees	Expenses	80% Fees	100% Expenses	Fees	Expenses	Unpaid
12/31/24 D.I. 327	10/31/24 – 11/30/24	\$291,583.50	\$0.00	\$233,266.80	\$0.00	\$291,583.50	\$0.00	\$0.00
01/23/25 D.I. 375	12/01/24 – 12/31/24	\$310,875.50	\$2,338.76	\$248,700.40	\$2,338.76	\$310,875.50	\$2,338.76	\$0.00
02/21/25 D.I. 467	01/01/25 – 01/31/25	\$269,429.00	\$0.00	\$215,543.20	\$0.00	\$215,543.20	\$0.00	\$53,885.80
03/31/25 D.I. 589	02/01/25 – 02/28/25	\$49,386.00	\$0.00	\$39,508.80	\$0.00	\$0.00	\$0.00	\$49,386.00
<b>TOTAL:</b>		<b>\$921,274.00</b>	<b>\$2,338.76</b>	<b>\$737,019.20</b>	<b>\$2,338.76</b>	<b>\$818,002.20</b>	<b>\$2,338.76</b>	<b>\$103,271.80</b>

**Interim Applications:**

		Total Amount Requested		Total Approved by Court Order [D.I. 561]		Total Amount Paid to Date
Date Filed/ Docket No.	Period Covered	Fees	Expenses	Fees	Expenses	Fees + Expenses
02/12/25 D.I. 443	10/31/24 – 12/31/24	\$602,459.00	\$2,338.76	\$602,459.00	\$2,338.76	\$604,797.76
<b>TOTAL:</b>		<b>\$602,459.00</b>	<b>\$2,338.76</b>	<b>\$602,459.00</b>	<b>\$2,338.76</b>	<b>\$604,797.76</b>

**COMPENSATION BY TIMEKEEPER**

<b>Name</b>	<b>Position, Year Assumed Position, Year of Obtaining Relevant License to Practice, Area of Expertise</b>	<b>Total Billed Hours</b>	<b>Hourly Billing Rate</b>	<b>Amount</b>
Beth M. Brownstein	Partner since 2019. Member of NY bar since 2009. Bankruptcy & Financial Restructuring.	3.00	\$1,000	\$3,000.00
Patrick Feeney	Joined firm as an associate in 2021. Member of NY bar since 2018. Bankruptcy & Financial Restructuring.	6.40	\$835	\$5,344.00
James E. Britton	Joined firm as an associate in 2020. Member of the PA bar since 2018. Member of the MA bar since 2019. Bankruptcy and Financial Restructuring.	12.70	\$810	\$10,287.00
Carolyn Indelicato	Joined the firm as an associate in 2024. Member of NY bar since 2021. Bankruptcy and Financial Restructuring.	0.80	\$660	\$528.00
Lisa A. Indelicato	Bankruptcy Senior Paralegal Specialist	23.90	\$515	\$12,308.50
<b>TOTAL</b>		<b>46.80</b>		<b>\$31,467.50</b>

**Blended Rate (Attorneys Only): \$836.64**

**COMPENSATION BY PROJECT CATEGORY**

<b>Project Category &amp; Number</b>	<b>Hours Billed</b>	<b>Fees Billed</b>
Petition, Schedules, First Day Orders (01)	0.00	\$0.00
Case Management and Operating Reports (02)	7.90	\$4,068.50
Corporate and Business Matters (03)	0.00	\$0.00
Investigation, Due Diligence, Analysis (04)	0.00	\$0.00
Committee and Debtor Communications (05)	3.70	\$3,207.00
Creditor Information Sharing and 1102 Services (06)	0.00	\$0.00
Creditor Inquiries (07)	0.00	\$0.00
Sale and Disposition of Assets (08)	0.00	\$0.00
Asset Analysis and Recovery (09)	0.00	\$0.00
Claims Administration and Objections (10)	0.60	\$486.00
Miscellaneous Motions and Objections (11)	0.00	\$0.00
Adversary Proceedings (12)	0.00	\$0.00
Professional Retention (13)	0.00	\$0.00
Fee Applications (14)	17.20	\$9,314.50
Cash Collateral and DIP Financing (15)	0.00	\$0.00
Disclosure Statement and Plan Matters (16)	17.40	\$14,391.50
Wage Employee Benefits, Severance, Pensions (17)	0.00	\$0.00
Real Estate (18)	0.00	\$0.00
Automatic Stay and Section 362 and 363 Matters (19)	0.00	\$0.00
Equipment Lessors and Non Real Estate Leases (20)	0.00	\$0.00
Utilities and Regulatory Matters (21)	0.00	\$0.00
Chapter 5 Litigation, Collection, Investigation (22)	0.00	\$0.00
Executory Contracts and Related Matters (23)	0.00	\$0.00
Tax (Federal, State, Local and Corporate) (24)	0.00	\$0.00
NOL's and Tax Attributes (25)	0.00	\$0.00
Plan or Restructuring Support Agreement (26)	0.00	\$0.00
Environmental Matters (27)	0.00	\$0.00
Debtor Communications/Negotiations (28)	0.00	\$0.00
Travel (29) <sup>2</sup>	0.00	\$0.00
Hercules Investigation (30)	0.00	\$0.00
<b>TOTAL</b>	<b>46.80</b>	<b>\$31,467.50</b>

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<sup>2</sup> Time billed for non-working travel is reduced by 50% in accordance with the Local Rules.

**EXPENSE SUMMARY**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
None.		
<b>TOTAL</b>		<b>\$ 0.00</b>

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

In re:

GRITSTONE BIO, INC.,<sup>1</sup>

Debtor.

Chapter 11

Case No. 24-12305 (KBO)

**Objection Deadline:**

May 13, 2025 at 4:00 p.m. (ET)

**Hearing Date:**

Only in the event necessary

**FIFTH MONTHLY APPLICATION OF ARENTFOX SCHIFF LLP,  
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS, FOR INTERIM ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR SERVICES RENDERED DURING  
THE PERIOD FROM MARCH 1, 2025 THROUGH APRIL 4, 2025**

ArentFox Schiff LLP (“ArentFox Schiff”), counsel to the Official Committee of Unsecured Creditors (the “Committee”) of Gritstone bio, Inc. (the “Debtor”), hereby submits its fifth monthly application (the “Application”) pursuant to (i) sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), (ii) Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), (iii) Rule 2016-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and (iv) the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 154] (the “Compensation Order”) for interim allowance of compensation for services rendered in the aggregate amount of \$31,467.50 and for reimbursement of actual and necessary expenses incurred by ArentFox Schiff in connection therewith in the amount of \$0.00 for the period from March 1, 2025 through April 4, 2025 (the “Compensation Period”). In support of this Application, ArentFox Schiff respectfully represents as follows:

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<sup>1</sup> 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.

### **JURISDICTION**

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012 (the “Amended Standing Order”). This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and the Court may enter a final order consistent with Article III of the United States Constitution.

2. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested herein are Bankruptcy Code sections 1103 and 330, Bankruptcy Rule 2016, and Local Rule 2016-1.

### **BACKGROUND**

4. On October 10, 2024 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “Court”). The Debtor continues to operate its business as a debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in this case.

5. On October 29, 2024, the United States Trustee for Region 3 (the “U.S. Trustee”) appointed the Committee and, on October 31, 2024, the Committee selected ArentFox Schiff as its counsel.

6. On December 13, 2024, the Court approved the retention of ArentFox Schiff as counsel to the Committee *nunc pro tunc* to October 31, 2024 [D.I. 254].

### **RELIEF REQUESTED**

7. By this Application, ArentFox Schiff seeks (i) interim allowance and award of compensation for the professional services rendered by ArentFox Schiff as attorneys during the Compensation Period in the amount of \$31,467.50, representing 22.90 hours of professional

services and 23.90 hours of paraprofessional services; and (ii) reimbursement of actual and necessary expenses incurred by ArentFox Schiff during the Compensation Period in connection with the rendering of such professional and paraprofessional services in the amount of \$0.00.

8. ArentFox Schiff seeks payment of 80% of its fees (\$25,174.00) and 100% of its expenses (\$0.00) relating to services rendered during the Compensation Period.

9. As stated in the Declaration of Andrew I. Silfen, Esq. (the "Silfen Declaration"), annexed hereto as Exhibit A, all services for which compensation is requested by ArentFox Schiff were performed for or on behalf of the Committee.

10. ArentFox Schiff has received no payment and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application for the Compensation Period. There is no agreement or understanding between ArentFox Schiff and any persons other than the partners of ArentFox Schiff for the sharing of compensation to be received for services rendered in this case.

#### **SUMMARY OF SERVICES RENDERED**

11. Since its retention, ArentFox Schiff rendered services to the Committee as requested and as appropriate in furtherance of the interests of unsecured creditors and in accordance with its fiduciary and statutory duties and obligations. The variety and complexity of the issues in this case and the need to act or respond to issues on an expedited basis in furtherance of the Committee's needs have required the expenditure of time by ArentFox Schiff personnel on an as-needed basis. In providing these services, ArentFox Schiff has represented the Committee professionally, diligently, and efficiently, advising Committee members on a wide variety of matters and issues intended to maximize recoveries to general unsecured creditors.

12. As is its practice with clients, ArentFox Schiff maintains written records of the time expended by attorneys and professionals in rendering professional services to the Committee. The



respective professionals made these time records contemporaneously with the services rendered. The records of services provided are separated into the major billing categories identified below. In classifying the services provided by ArentFox Schiff into task codes, ArentFox Schiff attempted to place the services performed in the category that best relates to the services provided. However, because certain services may relate to one or more categories, time spent on certain tasks may be included in another category.

13. The below summary of services rendered during the Compensation Period is not intended to be a detailed description of the work performed, as those day-to-day services and the time expended in performing such services are fully set forth in contemporaneous time records for the Compensation Period annexed hereto as **Exhibit B**. Rather, the summaries attempt to highlight certain of those areas in which services were rendered to the Committee.

14. ArentFox Schiff's time records comply with the requirements set forth in Local Rule 2016-1 and (v) the *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases, effective November 1, 2013* (the "**Guidelines**"), including the use of itemized time entries and separate matter numbers for different project types, as hereinafter described in greater detail.

15. To the best of ArentFox Schiff's knowledge, this Application complies with sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, Local Rule 2016-1, and the Interim Compensation Order.

**A. Case Management and Operating Reports**

Fees: \$4,068.50

Total Hours: 7.90

16. This category includes time expended by ArentFox Schiff on a variety of activities relating to day-to-day management and prosecution of the chapter 11 case. Services rendered in

this project category during the Compensation Period include, among other things, compiling and organizing of diligence materials received from the Debtor or other parties in interest on the docket for further use in the chapter 11 case and preparing other administrative materials for the Committee.

**B. Committee and Debtor Communications, Conference**

Fees: \$3,207.00

Total Hours: 3.70

17. The Committee's professionals held regular meetings to discuss and consider strategy in connection with the Debtor's case and confirmation hearing and post-confirmation strategy, as well as to ensure efficient administration and avoid duplication. These meetings involved considerable preparatory work regarding agendas, task lists and follow-up discussions and meetings. ArentFox Schiff also conferred with the Committee in connection with the appointment of the liquidating trustee and ensure a smooth transition from the Committee to the trustee post-confirmation.

18. ArentFox Schiff also prepared for and participated in regular Committee conference calls to provide an overview and recommendations with respect to legal and factual issues presented in these cases, including but not limited to the Debtor's plan confirmation and post-confirmation emergence. With respect to these calls, ArentFox Schiff was engaged in e-mail correspondence internally and with other professionals regarding preparation for the meetings. Additionally, ArentFox Schiff summarized pleadings for the Committee, prepared analyses of proposed actions and answered individual questions from Committee members. Further, ArentFox Schiff regularly engaged in discussions with the Debtor's professionals and other third parties to address the Debtor's upcoming confirmation hearing and coordinate post-confirmation strategy among the Debtor, the Committee, and the liquidation trustee.

**C. Claims Administration and Objections**

Fees: \$486.00

Total Hours: 0.60

19. This category relates to research on other claims. During the Compensation Period, ArentFox Schiff reviewed the Debtor's claims pool, including objections and notices of satisfied claims filed by the Debtor during the Compensation Period.

**D. Fee Applications**

Fees: \$9,314.50

Total Hours: 17.20

20. This category relates to work performed on the preparation of monthly and final fee applications. During the Compensation Period, ArentFox Schiff prepared and filed its *Fourth Monthly Application of ArentFox Schiff LLP, Counsel to the Official Committee of Unsecured Creditors, for Interim Allowance of Compensation and Reimbursement of Expenses for Services Rendered During the Period From February 1, 2025 through February 28, 2025* [Docket No. 589], including reviewing and finalizing its bills in connection therewith and drafting narrative descriptions of the amounts therein in accordance with the fee application procedures previously approved by the Court. During the Compensation Period, ArentFox Schiff also prepared its *Fifth Monthly Application of ArentFox Schiff LLP, Counsel to the Official Committee of Unsecured Creditors, for Interim Allowance of Compensation and Reimbursement of Expenses for Services Rendered During the Period From March 1, 2025 through April 4, 2025* and its *Final Fee Application of ArentFox Schiff LLP, Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Final Period From October 31, 2024 Through April 4, 2025*.

**E. Disclosure Statement and Plan Matters and Solicitation**

Fees: \$14,391.50

Total Hours: 17.40

21. During the Compensation Period, ArentFox Schiff worked extensively with the Committee's other professionals to negotiate with the Debtor, the DIP Lender, Hercules, and their professionals concerning the remaining unresolved issues under the Debtor's plan, including revision and finalization of the liquidating trust agreement and confirmation order, the treatment and timing of distributions, and certain other matters touching on post-confirmation emergence and responsibilities between the Debtor and the liquidating trustee. ArentFox Schiff also continued to review and revise the Debtor's plan and plan supplement to ensure that the terms of the Committee's deal were properly accounted for and preserved therein. ArentFox Schiff also attended the hearing to consider confirmation of the Debtor's plan.

**ACTUAL AND NECESSARY EXPENSES**

22. During the Compensation Period, ArentFox Schiff incurred \$0.00 in expenses on behalf of the Committee.

23. It is ArentFox Schiff's policy to charge its clients in all areas of practice for expenses incurred in connection with their clients' cases. The expenses charged to clients include, among other things, telecommunications, express mail, messenger services, travel expenses, working meals, computerized research, and transcription costs. ArentFox Schiff will charge the Debtors' estates for these expenses in a manner and at rates consistent with charges made generally to ArentFox Schiff's other clients. ArentFox Schiff believes that it is fairer to charge these expenses to the clients incurring them than to increase the hourly rates and spread the expenses among all clients. In providing a reimbursable expense, ArentFox Schiff does not make a profit on that expense, whether the service is performed by ArentFox Schiff in-house or through a third party.

24. ArentFox Schiff believes the foregoing rates are the market rates that the majority of law firms charge clients for such services. In addition, ArentFox Schiff believes that such charges are in accordance with the guidelines of the American Bar Association (“ABA”), as set forth in the ABA’s Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

**NOTICE**

25. Notice of this Application will be provided in accordance with the Interim Compensation Order on the Application Recipients (as defined in the Interim Compensation Order). ArentFox Schiff submits that no further notice is required.

**NO PRIOR REQUEST**

26. No prior request for the relief sought in this Application has been made to this or any other court.

*[Signature Page Follows]*

WHEREFORE, ArentFox Schiff respectfully requests that the Court:

(a) approve the interim allowance of \$31,467.50 for compensation for professional services rendered to the Committee during the period from March 1, 2025 through and including April 4, 2025.

(b) approve the reimbursement of ArentFox Schiff's out-of-pocket expenses incurred in connection with the rendering of such services during the period from March 1, 2025 through and including April 4, 2025, in the amount of \$0.00; and

(c) authorize and direct the Debtors to immediately pay to ArentFox Schiff the amount of \$25,174.00, which is equal to the sum of 80% of ArentFox Schiff's fees and 100% of ArentFox Schiff's expenses incurred during the Compensation Period.

Dated: April 29, 2025  
New York, New York

Respectfully submitted,

/s/ Andrew I. Silfen

Andrew I. Silfen, Esq. (admitted *pro hac vice*)  
Beth M. Brownstein, Esq. (admitted *pro hac vice*)  
Patrick Feeney, Esq. (admitted *pro hac vice*)  
Carolyn Indelicato, Esq. (admitted *pro hac vice*)  
**ARENTFOX SCHIFF LLP**  
1301 Avenue of the Americas, 42nd Floor  
New York, New York 10019  
Telephone: (212) 484-3900  
Facsimile: (212) 484-3990  
Email: Andrew.Silfen@afslaw.com  
Beth.Brownstein@afslaw.com

-and-

James E. Britton, Esq. (admitted *pro hac vice*)  
**ARENTFOX SCHIFF LLP**  
800 Boylston Street, 32nd Floor  
Boston, MA 02199  
Telephone: (617) 973-6100  
Facsimile: (617) 367-2315  
E-mail: James.Britton@afslaw.com

*Counsel for the Official Committee of Unsecured  
Creditors*

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

In re:

GRITSTONE BIO, INC.,<sup>1</sup>

Debtor.

Chapter 11

Case No. 24-12305 (KBO)

**Objection Deadline: May 13, 2025 at 4:00 p.m. (ET)**

**Hearing Date: Only in the event necessary**

**NOTICE OF FIFTH MONTHLY APPLICATION OF  
ARENTFOX SCHIFF LLP, COUNSEL TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS, FOR INTERIM ALLOWANCE OF COMPENSATION  
AND REIMBURSEMENT OF EXPENSES FOR SERVICES RENDERED DURING  
THE PERIOD FROM MARCH 1, 2025 THROUGH APRIL 4, 2025**

**PLEASE TAKE NOTICE** that the Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter 11 case of the above-captioned debtor and debtor in possession (the “Debtor”) filed the *Fifth Monthly Application of ArentFox Schiff LLP, Counsel to the Official Committee of Unsecured Creditors, for Interim Allowance of Compensation and Reimbursement of Expenses for Services Rendered During the Period from March 1, 2025 Through April 4, 2025* (the “Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that objections to the Application, if any, are required to be filed on or before **May 13, 2025 at 4:00 p.m. (ET)** (the “Objection Deadline”) with the Clerk of the United States Bankruptcy Court for the District of Delaware, 3<sup>rd</sup> Floor, 824 North Market Street, Wilmington, Delaware 19801.

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<sup>1</sup> 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.

**PLEASE TAKE FURTHER NOTICE** that objections to the Application, if any, must be served upon and received by the following: (I) counsel to the Debtor, Pachulski Stang Ziehl & Jones, 919 North Market Street, 17th Floor, Wilmington, DE 19899, (Attn: James E. O'Neill, Debra I. Grassgreen, John W. Lucas, and Malhar S. Pagay; emails: joneill@pszjlaw.com, dgrassgreen@pszjlaw.com, jlucas@pszjlaw.com, and mpagay@pszjlaw.com); (II) counsel to the Prepetition Secured Lenders, Cole Schotz P.C., 500 Delaware Avenue, Suite 1410, Wilmington, DE 19801 (Attn: Stacy L. Newman, Stuart Komrower, Warren A. Usatine, and Felice R. Yudkin; emails: snewman@coleschotz.com, skomrower@coleschotz.com, wusatine@coleschotz.com, and fyudkin@coleschotz.com) and Sheppard Mullin, Four Embarcadero Center, 17th Floor, San Francisco, CA 94111 (Attn: Ori Katz and Robert K. Sahyan; emails: okatz@sheppardmullin.com and rsahyan@sheppardmullin.com); (III) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801 (Attn: Timothy J. Fox, Jr.; email: timothy.fox@usdoj.gov); and (IV) counsel for the Committee, (a) ArentFox Schiff LLP, 1301 Avenue of the Americas, Floor 42, New York, NY (Attn: Andrew I. Silfen, Beth M. Brownstein, and Patrick Feeney; emails: andrew.silfen@afslaw.com, beth.brownstein@afslaw.com, patrick.feeney@afslaw.com, and carolyn.indelicato@afslaw.com), (b) ArentFox Schiff LLP, 800 Boylston Street, 32nd Floor, Boston, MA 02199 (Attn: James E. Britton; email: james.britton@afslaw.com), and (c) Potter Anderson & Corroon LLP, 1313 N. Market Street, 6th Floor, Wilmington DE 19801 (Attn: Christopher M. Samis, Aaron H. Stulman, Katelin A. Morales, and Ethan H. Sulik; emails: csamis@potteranderson.com, astulman@potteranderson.com, kmorlaes@potteranderson.com, and esulik@potteranderson.com).



**PLEASE TAKE FURTHER NOTICE** THAT PURSUANT TO THE ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS [DOCKET NO. 154], IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURE, THE DEBTOR WILL BE AUTHORIZED TO PAY 80% OF THE REQUESTED FEES AND 100% OF THE REQUESTED EXPENSES WITHOUT FURTHER ORDER OF THE COURT.

*[Signature Page Follows]*

Dated: April 29, 2025  
Wilmington, Delaware

Respectfully submitted,

/s/ Ethan H. Sulik

Christopher M. Samis (No. 4909)

Aaron H. Stulman (No. 5807)

Katelin A. Morales (No. 6683)

Ethan H. Sulik (No. 7270)

**POTTER ANDERSON & CORROON LLP**

1313 N. Market Street, 6<sup>th</sup> Floor

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-and-

Andrew I. Silfen, Esq.

Beth M. Brownstein, Esq.

Patrick Feeney, Esq.

Carolyn Indelicato, Esq.

**ARENTFOX SCHIFF LLP**

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-and-

James E. Britton, Esq.

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Facsimile: (617) 367-2315

Email: james.britton@afslaw.com

*Counsel for the Official Committee of Unsecured  
Creditors*

**EXHIBIT A**

**SILFEN DECLARATION**

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

In re:

GRITSTONE BIO, INC.,<sup>1</sup>

Debtor.

Chapter 11

Case No. 24-12305 (KBO)

**DECLARATION OF ANDREW I. SILFEN IN SUPPORT OF FIFTH  
MONTHLY APPLICATION OF ARENTFOX SCHIFF LLP, COUNSEL TO  
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR  
INTERIM ALLOWANCE OF COMPENSATION AND REIMBURSEMENT  
OF EXPENSES FOR SERVICES RENDERED DURING THE PERIOD  
FROM MARCH 1, 2025 THROUGH APRIL 4, 2025**

I, Andrew I. Silfen, declare under penalty of perjury:

1. I am a partner in the New York office of ArentFox Schiff LLP (“ArentFox Schiff”), a law firm which employs approximately 680 attorneys and maintains an office for the practice of law at 1301 Avenue of the Americas, 42nd Floor, New York, NY, as well as offices in Washington, DC; Los Angeles, CA; San Francisco, CA; Boston, MA; Chicago, IL; Lake Forest, IL; and Ann Arbor, MI.

2. I have read the *Fifth Monthly Application of ArentFox Schiff LLP, Counsel for the Official Committee of Unsecured Creditors, for Interim Allowance of Compensation and Reimbursement of Expenses for Services Rendered During the Period from March 1, 2025 through April 4, 2025* (the “Application”)<sup>2</sup> filed contemporaneously herewith.

3. All services for which compensation is requested by ArentFox Schiff were performed for or on behalf of the Committee.

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<sup>1</sup> 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.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Application.

4. To the best of my knowledge, information and belief, the statements contained in the Application are true and correct.

5. In addition, I have reviewed the *Local Rules of the United States Bankruptcy Court for the District of Delaware* (the “Local Rules”), and believe this Application complies with Rule 2016-1 of the Local Rules.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on April 29, 2025, in New York, New York.

By: /s/ Andrew I. Silfen  
Andrew I. Silfen

**EXHIBIT B**

**INVOICE**



Official Committee of Unsecured Creditors For Gritstone bio Inc.  
 5959 Horton Street, Suite 300  
 Emeryville, CA

Invoice Number 2426434  
 Invoice Date 04/17/2025  
 Client Number 046670

For Professional Services Rendered Through April 04, 2025

**046670 Official Committee of Unsecured Creditors for Gritstone Bio Inc.**

<u>No</u>	<u>Reference</u>	<u>Hours</u>	<u>Total</u>
00002	Case Management and Operating Reports	7.90	4,068.50
00005	Committee and Debtor Communications, Conference Calls and	3.70	3,207.00
00010	Claims Administration and Objections	0.60	486.00
00014	Fee Applications	17.20	9,314.50
00016	Disclosure Statement and Plan Matters and Solicitation	17.40	14,391.50
	<b>Totals</b>	<b>46.80</b>	<b>31,467.50</b>

046670 Official Committee of Unsecured Creditors For Gritstone bio Inc.

Invoice Number 2426434

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April 17, 2025

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**Time Summary**

	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Value</u></b>
<b><u>Partner</u></b>			
Beth M. Brownstein	3.00	1,000.00	3,000.00
<b><u>Associate</u></b>			
Patrick Feeney	6.40	835.00	5,344.00
James E. Britton	12.70	810.00	10,287.00
Carolyn Indelicato	0.80	660.00	528.00
<b>Blended Rate for Attorneys: \$836.64</b>			
<b><u>Paralegal</u></b>			
Lisa A. Indelicato	23.90	515.00	12,308.50
<b>Totals</b>	<b>46.80</b>		<b>31,467.50</b>



046670 Official Committee of Unsecured Creditors For Gritstone bio Inc.  
 00002 Case Management and Operating Reports  
 April 17, 2025

Invoice Number 2426434  
 Page 3

For Professional Services Rendered: April 04, 2025

Re: Case Management and Operating Reports

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Value</u>
03/03/25	Lisa A. Indelicato	Review docket and recent filings (.3); download recent filings to client folder (.3); update calendar (.5).	1.10	566.50
03/04/25	Lisa A. Indelicato	Review docket; review recent filings and download to client folder.	0.20	103.00
03/05/25	Lisa A. Indelicato	Review docket and recent filings, download to client folder and update calendar.	0.40	206.00
03/06/25	Lisa A. Indelicato	Review docket and recent filings, download to client folder and update calendar.	0.40	206.00
03/07/25	Lisa A. Indelicato	Review docket, download recent filings to client folder and review, and update calendar.	0.40	206.00
03/11/25	Lisa A. Indelicato	Review docket; review recent filings and download to client folder.	0.30	154.50
03/12/25	Lisa A. Indelicato	Review docket and recent filings.	0.20	103.00
03/13/25	Lisa A. Indelicato	Review docket and recent filings.	0.20	103.00
03/14/25	Lisa A. Indelicato	Review docket and recent filings.	0.20	103.00
03/17/25	Lisa A. Indelicato	Review docket and recent filings.	0.20	103.00
03/18/25	Lisa A. Indelicato	Review docket and recent filings.	0.20	103.00
03/19/25	Lisa A. Indelicato	Review docket and recent filings and update calendar.	0.30	154.50
03/21/25	Lisa A. Indelicato	Review docket; review recent filings and download to client folder.	0.60	309.00
03/24/25	Lisa A. Indelicato	Review docket; review recent filings and download to client folder.	0.30	154.50
03/25/25	Lisa A. Indelicato	Review docket; review recent filings and download to client folder.	0.50	257.50
03/27/25	Lisa A. Indelicato	Review docket; review recent filings and download to client folder.	0.30	154.50
03/28/25	Lisa A. Indelicato	Review docket and recent filings, download to client folder and update calendar.	0.50	257.50

Arent Fox Schiff LLP  
Attorneys at Law046670 Official Committee of Unsecured Creditors For Gritstone bio Inc.  
00002 Case Management and Operating Reports  
April 17, 2025Invoice Number 2426434  
Page 4

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Value</u>
03/31/25	Lisa A. Indelicato	Review docket; review recent filings and download to client folder.	0.30	154.50
04/01/25	Lisa A. Indelicato	Review docket; review recent filings and download to client folder and update calendar.	0.50	257.50
04/02/25	Lisa A. Indelicato	Review docket; download, review and circulate recent filings; update calendar.	0.50	257.50
04/03/25	Lisa A. Indelicato	Review docket; review recent filings and download to client folder and update calendar.	0.30	154.50
<b>Fee Total</b>			<b>7.90</b>	<b>\$4,068.50</b>

**Timekeeper Summary:**

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
Lisa A. Indelicato	7.90	515.00	4,068.50
<b>Timekeeper Summary Total</b>	<b>7.90</b>		<b>4,068.50</b>

Current Fees	\$4,068.50
<b>Subtotal For This Matter</b>	<b>\$4,068.50</b>

046670 Official Committee of Unsecured Creditors For Gritstone bio Inc.  
 00005 Committee and Debtor Communications, Conference Calls and  
 April 17, 2025

Invoice Number 2426434  
 Page 5

For Professional Services Rendered: April 04, 2025

Re: Committee and Debtor Communications, Conference Calls and

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Value</u>
03/05/25	Lisa A. Indelicato	Cancel weekly Committee call; review emails re same.	0.10	51.50
03/12/25	James E. Britton	Correspondence with committee members regarding case updates.	0.20	162.00
03/12/25	Lisa A. Indelicato	Cancel weekly call with Committee; review emails re same.	0.10	51.50
03/19/25	Beth M. Brownstein	Correspondence re; plan; attend committee call	0.60	600.00
03/19/25	James E. Britton	Phone call with committee members regarding upcoming confirmation hearing.	0.30	243.00
03/19/25	Patrick Feeney	Attend committee meeting	0.20	167.00
03/21/25	Beth M. Brownstein	Attend call with debtor re: confirmation prep (.6); follow up with T. Pitta re: same (.3); follow up with FTI re: next steps (.2)	1.10	1,100.00
03/21/25	James E. Britton	Phone call with Debtor professionals regarding confirmation hearing and emergence.	0.50	405.00
03/24/25	James E. Britton	Correspondence with liquidating trustee regarding post confirmation activities.	0.20	162.00
03/25/25	James E. Britton	Correspondence to committee members regarding confirmation adjournment.	0.20	162.00
04/02/25	Lisa A. Indelicato	Reschedule weekly meeting with Committee.	0.10	51.50
04/02/25	Lisa A. Indelicato	Correspond with Committee member regarding TEAMS meeting.	0.10	51.50
<b>Fee Total</b>			<b>3.70</b>	<b>\$3,207.00</b>

**Timekeeper Summary:**

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
Beth M. Brownstein	1.70	1,000.00	1,700.00
Patrick Feeney	0.20	835.00	167.00
James E. Britton	1.40	810.00	1,134.00

Arent Fox Schiff LLP  
Attorneys at Law

046670 Official Committee of Unsecured Creditors For Gritstone bio Inc. Invoice Number 2426434  
00005 Committee and Debtor Communications, Conference Calls and Page 6  
April 17, 2025

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<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
Lisa A. Indelicato	0.40	515.00	206.00
<b>Timekeeper Summary Total</b>	<b>3.70</b>		<b>3,207.00</b>
Current Fees			\$3,207.00
<b>Subtotal For This Matter</b>			<b>\$3,207.00</b>

Arent Fox Schiff LLP  
Attorneys at Law046670 Official Committee of Unsecured Creditors For Gritstone bio Inc.  
00010 Claims Administration and Objections  
April 17, 2025Invoice Number 2426434  
Page 7

For Professional Services Rendered: April 04, 2025

Re: Claims Administration and Objections

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Value</u>
03/12/25	James E. Britton	Review and analyze debtor's four omnibus claims objections.	0.30	243.00
03/20/25	James E. Britton	Review and analyze objections to Debtor's notices of satisfied claims.	0.30	243.00
<b>Fee Total</b>			<b>0.60</b>	<b>\$486.00</b>

**Timekeeper Summary:**

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
James E. Britton	0.60	810.00	486.00
<b>Timekeeper Summary Total</b>	<b>0.60</b>		<b>486.00</b>

Current Fees	\$486.00
<b>Subtotal For This Matter</b>	<b>\$486.00</b>

046670 Official Committee of Unsecured Creditors For Gritstone bio Inc.  
 00014 Fee Applications  
 April 17, 2025

Invoice Number 2426434  
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For Professional Services Rendered: April 04, 2025

Re: Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Value</u>
03/05/25	Carolyn Indelicato	Review February pro formas	0.30	198.00
03/06/25	Lisa A. Indelicato	Prepare fourth monthly fee application.	1.60	824.00
03/07/25	James E. Britton	Review and analyze CNO and correspondence regarding fee application.	0.20	162.00
03/12/25	Lisa A. Indelicato	Prepare fourth monthly fee application.	2.20	1,133.00
03/14/25	Lisa A. Indelicato	Draft monthly fee application for March.	2.10	1,081.50
03/17/25	Lisa A. Indelicato	Draft final fee application.	2.90	1,493.50
03/20/25	Lisa A. Indelicato	Email Y. Cruz and V. Santiago regarding payments received.	0.10	51.50
03/21/25	Lisa A. Indelicato	Prepare exhibits to final fee application.	3.30	1,699.50
03/21/25	Lisa A. Indelicato	Follow up discussions with Y. Cruz and V. Santiago regarding payments received.	0.10	51.50
03/24/25	James E. Britton	Review and revise fee application for February.	0.70	567.00
03/24/25	James E. Britton	Review and analyze February invoice.	0.30	243.00
03/24/25	Lisa A. Indelicato	Internal discussions regarding final fee application.	0.20	103.00
03/24/25	Lisa A. Indelicato	Revise and circulate Fourth Monthly Fee Application, invoice and LEDES file.	0.50	257.50
03/27/25	Lisa A. Indelicato	Correspond with Beth Brownstein regarding Fourth Monthly Fee Application.	0.10	51.50
03/31/25	James E. Britton	Review and finalize February fee application and correspondence regarding same (0.2).	0.20	162.00
03/31/25	Lisa A. Indelicato	Correspond with Beth Brownstein and James Britton regarding Fourth Monthly Fee Application (.2); finalize Fourth Monthly Fee Application and email to local counsel for filing and service (.6).	0.80	412.00
04/04/25	Lisa A. Indelicato	Revise final fee application.	1.40	721.00
04/04/25	Lisa A. Indelicato	Email w. J. Britton re status of fifth monthly and final fee applications.	0.10	51.50
04/04/25	Lisa A. Indelicato	Calendar deadline to file final fee	0.10	51.50

Arent Fox Schiff LLP

Attorneys at Law

046670 Official Committee of Unsecured Creditors For Gritstone bio Inc.  
 00014 Fee Applications  
 April 17, 2025

Invoice Number 2426434  
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<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Value</u>
		applications.		
		<b>Fee Total</b>	<b>17.20</b>	<b>\$9,314.50</b>

**Timekeeper Summary:**

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
James E. Britton	1.40	810.00	1,134.00
Carolyn Indelicato	0.30	660.00	198.00
Lisa A. Indelicato	15.50	515.00	7,982.50
<b>Timekeeper Summary Total</b>	<b>17.20</b>		<b>9,314.50</b>

Current Fees	\$9,314.50
<b>Subtotal For This Matter</b>	<b>\$9,314.50</b>

046670 Official Committee of Unsecured Creditors For Gritstone bio Inc.  
 00016 Disclosure Statement and Plan Matters and Solicitation  
 April 17, 2025

Invoice Number 2426434  
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For Professional Services Rendered: April 04, 2025

Re: Disclosure Statement and Plan Matters and Solicitation

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Value</u>
03/01/25	James E. Britton	Review and analyze revisions to liquidating trust agreement.	0.20	162.00
03/01/25	James E. Britton	Review and analyze plan regarding claims objections procedures and distributions.	0.20	162.00
03/01/25	James E. Britton	Correspondence regarding liquidating trust agreement revisions and plan provisions.	0.20	162.00
03/02/25	James E. Britton	Review and analyze comments to liquidating trust agreement and revise agreement further.	0.50	405.00
03/03/25	James E. Britton	Revise liquidating trust agreement and correspondence regarding revisions and plan supplement.	0.20	162.00
03/04/25	James E. Britton	Review and analyze comments to liquidating trust agreement from Hercules (0.2).	0.20	162.00
03/04/25	James E. Britton	Correspondence regarding liquidating trust agreement and revisions.	0.20	162.00
03/04/25	James E. Britton	Further revise trust agreement.	0.20	162.00
03/05/25	Beth M. Brownstein	finalize LTA and documents for filing supplement	0.30	300.00
03/05/25	James E. Britton	Correspondence regarding liquidating trust revisions and review and analyze revisions.	0.20	162.00
03/05/25	James E. Britton	Further revise liquidating trust agreement.	0.20	162.00
03/05/25	James E. Britton	Review and analyze plan supplement.	0.30	243.00
03/10/25	James E. Britton	Correspondence regarding draft confirmation order and comments.	0.20	162.00
03/10/25	Patrick Feeney	Review draft confirmation order.	0.50	417.50
03/11/25	James E. Britton	Correspondence regarding confirmation order draft and comments.	0.20	162.00
03/11/25	Patrick Feeney	Review draft confirmation order.	1.60	1,336.00
03/13/25	James E. Britton	Review and revise proposed confirmation order.	1.20	972.00
03/13/25	James E. Britton	Review and analyze plan.	0.20	162.00



Arent Fox Schiff LLP  
Attorneys at Law046670 Official Committee of Unsecured Creditors For Gritstone bio Inc.  
00016 Disclosure Statement and Plan Matters and Solicitation  
April 17, 2025Invoice Number 2426434  
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<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Value</u>
03/16/25	James E. Britton	Correspondence regarding revisions to confirmation order.	0.20	162.00
03/16/25	James E. Britton	Review and revise comments to confirmation order.	0.30	243.00
03/17/25	James E. Britton	Correspondence regarding confirmation order comments and voting deadline.	0.20	162.00
03/17/25	James E. Britton	Review and analyze further comments to confirmation order.	0.20	162.00
03/17/25	James E. Britton	Review and analyze limited objection to plan.	0.20	162.00
03/17/25	Patrick Feeney	Review revisions to confirmation order.	0.10	83.50
03/18/25	James E. Britton	Review and analyze voting report.	0.20	162.00
03/18/25	James E. Britton	Correspondence regarding confirmation hearing and preparation.	0.20	162.00
03/19/25	James E. Britton	Correspondence regarding confirmation hearing and coordination on pre and post confirmation tasks.	0.20	162.00
03/20/25	Beth M. Brownstein	Attend call with trustee and claims agent re: next steps and preparing for confirmation	0.50	500.00
03/20/25	James E. Britton	Phone call with claims agent regarding post-confirmation services.	0.40	324.00
03/20/25	James E. Britton	Correspondence regarding confirmation order comments and hearing preparation.	0.20	162.00
03/21/25	James E. Britton	Correspondence regarding confirmation hearing tasks.	0.20	162.00
03/21/25	James E. Britton	Review and analyze comments to confirmation order.	0.20	162.00
03/21/25	Patrick Feeney	Draft statement in support of confirmation of plan.	2.00	1,670.00
03/21/25	Patrick Feeney	Review and revise/comment upon confirmation brief.	1.50	1,252.50
03/24/25	Patrick Feeney	Revise statement in support of plan confirmation and prep for filing.	0.50	417.50
03/25/25	James E. Britton	Review and analyze notice of confirmation adjournment and correspondence regarding same.	0.20	162.00
03/30/25	James E. Britton	Review and analyze revisions to plan.	0.30	243.00
03/30/25	James E. Britton	Correspondence regarding plan revisions.	0.20	162.00
03/31/25	Beth M. Brownstein	correspondence with DEbtors re: finalizing	0.50	500.00

046670 Official Committee of Unsecured Creditors For Gritstone bio Inc.  
 00016 Disclosure Statement and Plan Matters and Solicitation  
 April 17, 2025

Invoice Number 2426434  
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<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Value</u>
		plan, confirmation order		
03/31/25	James E. Britton	Review and analyze revised confirmation order.	0.20	162.00
04/02/25	Carolyn Indelicato	Attend virtual confirmation hearing	0.50	330.00
04/02/25	James E. Britton	Attend plan confirmation hearing.	0.60	486.00
04/03/25	James E. Britton	Correspondence regarding confirmation order.	0.20	162.00
04/04/25	James E. Britton	Correspondence regarding notice of effective date and liquidating trust agreement.	0.20	162.00
04/04/25	James E. Britton	Revise and finalize liquidating trust agreement.	0.30	243.00
04/04/25	Lisa A. Indelicato	Download and review Notice of Effective Date.	0.10	51.50
<b>Fee Total</b>			<b>17.40</b>	<b>\$14,391.50</b>

**Timekeeper Summary:**

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
Beth M. Brownstein	1.30	1,000.00	1,300.00
Patrick Feeney	6.20	835.00	5,177.00
James E. Britton	9.30	810.00	7,533.00
Carolyn Indelicato	0.50	660.00	330.00
Lisa A. Indelicato	0.10	515.00	51.50
<b>Timekeeper Summary Total</b>	<b>17.40</b>		<b>14,391.50</b>

Current Fees \$14,391.50  
**Subtotal For This Matter** \$14,391.50

**CERTIFICATE OF SERVICE**

I, Ethan H. Sulik, do hereby certify that on April 29, 2025, I caused a copy of the foregoing **Fifth Monthly Application of ArentFox Schiff LLP, Counsel to the Official Committee of Unsecured Creditors, for Interim Allowance of Compensation and Reimbursement of Expenses for Services Rendered During the Period from March 1, 2025 Through April 4, 2025** to be served on the parties listed on the attached service list in the manner indicated.

/s/ *Ethan H. Sulik*

Ethan H. Sulik (No. 7270)

**SERVICE LIST**

**Counsel to the Debtors**

**Pachulski Stang Ziehl & Jones**

Attn: James E. O'Neill, Debra I. Grassgreen  
John W. Lucas, and Malhar S. Pagay  
919 North Market Street, 17th Floor  
Wilmington, DE 19899  
Email: joneill@pszjlaw.com;  
dgrassgreen@pszjlaw.com;  
jlucas@pszjlaw.com; mpagay@pszjlaw.com

**VIA FCM**

**Counsel to Prepetition Secured Lenders**

**Cole Schotz P.C.**

Attn: Stacy L. Newman, Stuart Komrower,  
Warren A. Usatine, and Felice R. Yudkin  
500 Delaware Avenue, Suite 1410  
Wilmington, DE 19801  
Email: snewman@coleschotz.com;  
skomrower@coleschotz.com;  
wusatine@coleschotz.com;  
fyudkin@coleschotz.com

**VIA FCM**

**Counsel to Prepetition Secured Lenders**

**Sheppard Mullin**

Attn: Ori Katz and Robert K. Sahyan  
Four Embarcadero Center, Seventeenth Floor  
San Francisco, CA 94111  
Email: okatz@sheppardmullin.com;  
rsahyan@sheppardmullin.com

**VIA FCM**

**United States Trustee**

**Office of the United States Trustee for the  
District of Delaware**

Attn: Timothy Jay Fox, Jr.  
844 King Street, Suite 2207  
Lockbox 35  
Wilmington, DE 19801  
Email: timothy.fox@usdoj.gov

**VIA FCM**