

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

In re:

GRITSTONE BIO, INC.,

Reorganized Debtor.

Chapter 11

Case No. 24-12305 (KBO)

Hearing Date: July 1, 2025 at 9:30 a.m. (ET)
Objection Deadline: June 13, 2025 at 4:00 p.m. (ET)

**MOTION TO EXTEND DEADLINE TO OBJECT
TO ADMINISTRATIVE EXPENSE CLAIMS**

Gritstone bio, Inc. (the “Reorganized Debtor”) hereby moves this Court (the “Motion”) for an order extending the time period to file and serve objections to administrative expense claims (the “Administrative Expense Claim Objection Deadline”). The current Administrative Expense Claim Objection Deadline is May 30, 2025. In support of the Motion, the Reorganized Debtor respectfully represents as follows:

JURISDICTION

1. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012, and Article XI of the Plan. This is a core proceeding pursuant to 28 U.S.C. § 157(b) and, pursuant to Local Rule 9013–1(f), the Reorganized Debtor consents to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution. Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The Reorganized Debtor brings this Motion pursuant to section 105 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 9006 of the Federal Rules of Bankruptcy



Procedure (the “Bankruptcy Rules”) and Rule 9006–2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”).

BACKGROUND

3. On October 10, 2024 (the “Petition Date”), the Reorganized Debtor commenced this case (the “Chapter 11 Case”) by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Reorganized Debtor has continued in the possession of its property as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Chapter 11 Case.

4. A detailed description of the Reorganized Debtor’s business and facts precipitating the filing of the Reorganized Debtor’s chapter 11 proceeding is set forth in the *Declaration of Vassiliki (“Celia”) Economides in Support of the Debtor’s Chapter 11 Petition and First Day Relief* (the “First Day Declaration”) [Docket No. 17], incorporated herein by reference.¹

5. On December 23, 2024, the Court entered the *Order (A) Approving the Sale of Substantially All of the Debtor’s Assets Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) Approving Assumption and Assignment of Certain Unexpired Leases and Executory Contracts; and (C) Granting Related Relief* [Docket No. 293], which order approved the sale and “Asset Purchase Agreement” between the Debtor and Seattle Project Corp.

6. On April 4, 2025, the Court entered the *Order Confirming Gritstone bio, Inc.’s Second Modified Chapter 11 Plan of Reorganization* [Docket No. 601] (the “Confirmation Order”), which confirmed *Gritstone bio, Inc.’s Second Modified Chapter 11 Plan of*

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the First Day Declaration.

Reorganization (the “Plan”), attached as Exhibit A to the Confirmation Order. The Plan created the Liquidating Trust and appointed the Liquidating Trustee. The Effective Date of the Plan occurred on April 4, 2025.

7. Since the Effective Date, the Reorganized Debtor has completed certain post Effective Date operational tasks and reviewed and resolved certain claims.

8. Pursuant to the Notice of Effective Date, the deadline to object to administrative expense claims is May 30, 2025. As of the date hereof, the Reorganized Debtor has substantially completed a claims reconciliation process that includes identifying particular categories of claims that may be targeted for disallowance and expungement, reduction and allowance, or reclassification and allowance. In connection therewith, the Reorganized Debtor has filed four omnibus objections to claims.

9. While the Reorganized Debtor believes that only a few administrative claims will require a formal objection, the Reorganized Debtor needs more time to complete and document any resolution of pending claims, wind down the claim process, and make a final determination with respect to administrative claimants and continue its efforts to resolve claims without objection. Accordingly, the Reorganized Debtor must further reserve its right to formally oppose such administrative claims not otherwise consensually resolved to prohibit prejudice to allowed claimants.

RELIEF REQUESTED

10. By this Motion, the Reorganized Debtor respectfully requests entry of an order, (a) extending the Administrative Expense Claim Objection Deadline through and including July 14, 2025, without prejudice to the rights of the Reorganized Debtor to request further extension of

the Administrative Expense Claim Objection Deadline to the extent provided by the Plan, and (b) granting related relief.²

BASIS FOR RELIEF

11. Section 105 of the Bankruptcy Code provides that the Court may “issue any order . . . necessary or appropriate to carry out the provisions of this title.” Also, Bankruptcy Rule 9006(b) provides, in relevant part:

[W]hen an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may . . . order the period enlarged

Fed. R. Bankr. P. 9006(b)

12. Cause exists to extend the Administrative Expense Claim Objection Deadline as requested herein because claims are still under review by the Reorganized Debtor.

13. The Reorganized Debtor has analyzed and, in many cases, resolved or satisfied the proofs of claim filed against the Reorganized Debtor during this chapter 11 case. The Reorganized Debtor’s review and reconciliation process continues. The Reorganized Debtor wishes to pursue claims objections in a cost-efficient manner, which requires further efforts at informal resolution to minimize the administrative expenses associated with pursuing formal objections. Consequently, the Reorganized Debtor requests sufficient additional time to engage in a process of further review, reconciliation, and settlement discussions to minimize the number of claims that will be the subject of any further filed objections.

14. Accordingly, the Reorganized Debtor requests an extension of the Administrative Expense Claim Objection Deadline from May 30, 2025 through and including July 14, 2025.

² Pursuant to Local Rule 9006–2, since this Motion was filed before the expiration of the period, the time is automatically extended until the Court acts on the Motion.

NOTICE

15. The Reorganized Debtor will serve copies of this Motion on (a) the Office of the United States Trustee; and (b) any party that has requested notice pursuant to Bankruptcy Rule 2002.

WHEREFORE, the Reorganized Debtor respectfully requests that the Court enter an order, in substantially the form attached hereto, (a) granting the Motion, (b) extending the deadline by which the Reorganized Debtor may file any objections to administrative expense claims through and including July 14, 2025; (c) granting such order without prejudice to the Reorganized Debtor's right to seek further extensions of such deadlines; and (d) granting such other relief as the Court deems just and proper.

Dated: May 30, 2025

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill

Debra I. Grassgreen, (admitted *pro hac vice*)

John W. Lucas, (admitted *pro hac vice*)

Malhar S. Pagay, (admitted *pro hac vice*)

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Counsel to the Reorganized Debtor

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

In re:

GRITSTONE BIO, INC.,

Reorganized Debtor.

Chapter 11

Case No. 24-12305 (KBO)

Hearing Date: July 1, 2025 at 9:30 a.m. (ET)
Objection Deadline: June 13, 2025 at 4:00 p.m. (ET)

**NOTICE OF MOTION TO EXTEND DEADLINE
TO OBJECT TO ADMINISTRATIVE EXPENSE CLAIMS**

PLEASE TAKE NOTICE THAT on May 30, 2025, Gritstone bio, Inc. (the “Reorganized Debtor”) filed the *Motion to Extend Deadline to Object to Administrative Expense Claims* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801 (the “Bankruptcy Court”). A copy of the Motion is attached hereto.

PLEASE TAKE FURTHER NOTICE that any response or objection to the entry of an order with respect to the relief sought in the Motion must be filed with the Bankruptcy Court on or before **June 13, 2025 at 4:00 p.m. prevailing Eastern time.**

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response or objection upon: (a) counsel for the Reorganized Debtor, (i) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, P.O. Box 8705, Wilmington, DE 19899-8705 (Courier 19801), Attn: James E. O’Neill (joneill@pszjlaw.com); and (ii) Pachulski Stang Ziehl & Jones LLP, One Sansome Street, Suite 3430, San Francisco, CA 94104, Attn: Debra I. Grassgreen (dgrassgreen@pszjlaw.com) and John W. Lucas (jlucas@pszjlaw.com); (b) Office of the U.S. Trustee for the District of Delaware, 844 King Street, Suite 2207, Lockbox 35,

Wilmington, DE 19801, Attn: Timothy J. Fox, Jr., Esq. (timothy.fox@usdoj.gov); and (c) any party that requests service pursuant to Bankruptcy Rule 2002.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

PLEASE TAKE FURTHER NOTICE THAT, IF OBJECTIONS ARE RECEIVED, A HEARING TO CONSIDER THE RELIEF SOUGHT IN THE MOTION WILL BE HELD ON JULY 1, 2025, AT 9:30 A.M. (ET) BEFORE THE HONORABLE KAREN B. OWENS, UNITED STATES BANKRUPTCY COURT JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 6TH FLOOR, COURTROOM NO. 3, WILMINGTON, DELAWARE 19801.

Dated: May 30, 2025

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill

Debra I. Grassgreen, (admitted *pro hac vice*)

John W. Lucas, (admitted *pro hac vice*)

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Counsel to the Reorganized Debtor

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In re:

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Related Docket No.

**ORDER GRANTING MOTION TO EXTEND DEADLINE
TO OBJECT TO ADMINISTRATIVE EXPENSE CLAIMS**

Upon consideration of the *Motion to Extend Deadline to Object to Administrative Expense Claims* (the “Motion”), and it appearing that good cause exists to grant the relief requested by the Motion, it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The time period to file and serve objections to administrative expense claims in this Chapter 11 case is extended through and including July 14, 2025, without prejudice to the rights of the Reorganized Debtor to request further extensions of the Administrative Expense Claim Objection Deadline.
3. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).
4. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation of this Order.