

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re

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

Debtor.

Chapter 11

Case Nos. 24-12305-KBO

**Re: Docket No(s). 309**

**CERTIFICATION OF COUNSEL REGARDING PROPOSED ORDER APPROVING  
STIPULATION AND AGREEMENT AMONG THE REORGANIZED DEBTOR, THE  
LIQUIDATION TRUSTEE, AND FISHER SCIENTIFIC COMPANY LLC WITH  
RESPECT TO RECLASSIFICATION OF ADMINISTRATIVE CLAIM AS AN  
ALLOWED UNSECURED CLAIM**

Adam Hiller, counsel for Fisher Scientific Company LLC (“Fisher”), hereby certifies as follows:

1. On January 13, 2025, Fisher filed Claim No. 109 on the Claims Register, asserting a claim in the total amount of \$110,691.56 (the “Fisher Claim”), itemized as follows: (a) an unsecured claim of \$72,507.93, (b) an administrative priority claim pursuant to 503(b)(2) of \$27,060.78 (the “Fisher Reclamation Claim”), and (c) an administrative priority claim pursuant to section 503(b)(9) of the Bankruptcy Code of \$11,122.85 (the “Fisher 503(b)(9) Claim”) and on April 30, 2025, Fisher filed its Request for Payment of Administrative Expense, asserting both the Fisher Reclamation Claim and the Fisher 503(b)(9) Claim. [Doc. No. 658.]

2. The Fisher 503(b)(9) Claim was paid in full by the Debtor.

3. The Reorganized Debtor objected to the treatment of the Fisher Reclamation Claim as an administrative claim.

<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.



4. Following responses and replies, the Parties have agreed that the Fisher Reclamation Claim will be reclassified and treated as part of Fisher's allowed general unsecured claim now in the total amount of \$99,568.71 (the "Fisher Allowed GUC").

5. To resolve this dispute, the Reorganized Debtor, the Liquidating Trustee and Fisher have executed the Stipulated Order attached hereto as **Exhibit 1** (the "Stipulated Order").

6. Counsel for the Reorganized Debtor and Liquidation Trustee have indicated to me that they consent to the entry of the Stipulated Order as an order of the Court.

7. Fisher requests that the Court enter the Stipulated Order as an order of the Court at the Court's convenience.

Dated: September 29, 2025  
Wilmington, Delaware

Respectfully submitted,  
  
HILLER LAW, LLC

/s/ Adam Hiller

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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re

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

Debtor.

Chapter 11

Case Nos. 24-12305-KBO

**Re: Docket No(s). 309**

**ORDER APPROVING STIPULATED ORDER**

UPON CONSIDERATION of the Stipulated Order agreed to among Fisher Scientific Company LLC, the Liquidation Trustee and Reorganized Debtors, said Stipulated Order Reclassifying Reclamation Claim Only As An Allowed General Unsecured Claim being attached hereto as **Exhibit A** (the “Stipulated Order”); it is hereby ORDERED that the Stipulated Order is APPROVED. The Court shall retain jurisdiction to interpret and enforce the terms of the Stipulated Order.

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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.

**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)

**STIPULATED ORDER RECLASSIFYING RECLAMATION CLAIM ONLY AS AN  
ALLOWED GENERAL UNSECURED CLAIM**

Gritstone bio, Inc. (the “Reorganized Debtor”), the Liquidation Trustee (the “Liquidation Trustee”) established by the Reorganized Debtor’s Second Modified Chapter 11 Plan of Reorganization (Docket No. 585) (the “Plan”), and Fisher Scientific Company LLC (“Fisher,” and together with the Reorganized Debtor and the Liquidating Trustee, the “Parties”), hereby enter into and consent to this Stipulated Order (“Stipulation”), as set forth below.

1. On January 13, 2025, Fisher filed Claim No. 109 on the Claims Register, asserting a claim in the total amount of \$110,691.56 (the “Fisher Claim”), itemized as follows: (a) an unsecured claim of \$72,507.93, (b) an administrative priority claim pursuant to 503(b)(2) of \$27,060.78 (the “Fisher Reclamation Claim”), and (c) an administrative priority claim pursuant to section 503(b)(9) of the Bankruptcy Code of \$11,122.85 (the “Fisher 503(b)(9) Claim”).

2. On April 30, 2025, Fisher filed its Request for Payment of Administrative Expense, asserting both the Fisher Reclamation Claim and the Fisher 503(b)(9) Claim. [Doc. No. 658.]

3. The Fisher 503(b)(9) Claim was paid in full by the Debtor.

4. The Reorganized Debtor objected to the treatment of the Fisher Reclamation Claim as an administrative claim.

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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.

5. The Parties have agreed, and it is hereby **ORDERED**, that the Fisher Reclamation Claim will be reclassified and treated as part of Fisher's allowed general unsecured claim now in the total amount of \$99,568.71 (the "Fisher Allowed GUC").

6. Other than the Fisher Allowed GUC, Fisher shall not file or seek payment on account of any other claim (including but not limited to any priority, administrative, and/or general unsecured claims) against the Debtor, the Debtor's estate, the Liquidation Trustee, the Liquidation Trust, and/or the Reorganized Debtors, that could have been asserted prior to the Petition Date, arising out of or relating to the subject matter of the Fisher Claim, except with respect to any claims arising out any breach of, or action to enforce, this Stipulation, and Fisher hereby waives and releases all such claims against the Debtor, the Debtor's estate, the Liquidation Trustee, the Liquidation Trust, and/or the Reorganized Debtors, except, for the avoidance of doubt, (i) the Fisher Allowed GUC, and (ii) any claims arising out of any breach of, or action to enforce, this Stipulation; provided however, to the extent that such claims exist, Fisher shall be allowed to assert such claims as a defense in any litigation brought against Fisher by the Debtor, the Debtor's estate, the Liquidation Trustee, the Liquidation Trust, and/or the Reorganized Debtors.

6. The Bankruptcy Court for the District of Delaware shall retain exclusive jurisdiction to hear any matters or disputes arising from or relating to this Stipulation.

Consented to and Agreed:

Dated: September 25, 2025  
Wilmington, Delaware

Respectfully submitted,

PACHULSKI STANG ZIEHL & JONES  
LLP

/s/ James E. O'Neill

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