

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

GRITSTONE BIO, INC.,¹

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 DEBTORS, THE
LIQUIDATING TRUSTEE AND LIFE TECHNOLOGIES CORPORATION WITH
RESPECT TO RECLASSIFICATION OF ADMINISTRATIVE CLAIM AS AN
ALLOWED UNSECURED CLAIM**

Adam Hiller, counsel for Life Technologies Corporation (“Life Tech”), hereby certifies as follows:

1. On January 15, 2025, Life Tech filed Claim No. 124 on the Claims Register, asserting a claim in the total amount of \$31,425.55 (the “Life Tech Claim”), itemized as follows: (a) an administrative priority claim pursuant to 503(b)(2) of \$24,893.75, as set forth in the Life Tech Reclamation Demand (the “Life Tech Reclamation Claim”), and (b) an administrative priority claim pursuant to section 503(b)(9) of the Bankruptcy Code of \$6,527.80, which amount was also included in the Life Tech Reclamation Demand (the “Life Tech 503(b)(9) Claim”).

2. On April 30, 2025, Life Tech filed a Request for Payment of Administrative Expense, asserting the Life Tech Reclamation Claim and the Life Tech 503(b)(9) Claim. [Doc. No. 659.]

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

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

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.



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5. Following responses and replies, the Parties have agreed that the Life Tech Reclamation Claim will be reclassified and treated as part of Life Tech's allowed general unsecured claim now in the total amount of \$24,893.75 (the "Life Tech Allowed GUC").

6. To resolve this Dispute, the Reorganized Debtor, the Liquidating Trustee and Life Tech have executed the Stipulated Order attached hereto as **Exhibit 1** (the "Stipulated Order").

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

8. Life Tech 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.,¹

Debtor.

Chapter 11

Case Nos. 24-12305-KBO

Re: Docket No(s). 309

ORDER APPROVING STIPULATION ORDER

UPON CONSIDERATION of the Stipulated Order agreed to among Life Tech Scientific Company LLC, the Liquidating Trustee and the Reorganized Debtors, said Stipulated Order Reclassifying Reclamation Claim Only As An Allowed General Unsecured Claim 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.

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.

**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)

**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 Life Technologies Corporation (“Life Tech,” 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 15, 2025, Life Tech filed its Claim No. 124 on the Claims Register, asserting a total claim in the amount of \$31,425.55 (the “Life Tech Claim”), itemized as follows: (a) an administrative priority claim pursuant to 503(b)(2) of \$24,893.75, as set forth in the Life Tech Reclamation Demand (the “Life Tech Reclamation Claim”), and (b) an administrative priority claim pursuant to section 503(b)(9) of the Bankruptcy Code of \$6,527.80, which amount was also included in the Life Tech Reclamation Demand (the “Life Tech 503(b)(9) Claim”).

2. On April 30, 2025, Life Tech filed a Request for Payment of Administrative Expense, asserting the Life Tech Reclamation Claim and the Life Tech 503(b)(9) Claim. [Doc. No. 659.]

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

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.

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

5. The Parties have agreed and it is hereby **ORDERED** that the Reclamation Claim shall be reclassified and treated as an allowed general unsecured claim in the amount of \$24,893.75 (the “Life Tech Allowed GUC”).

6. Other than the Life Tech Allowed GUC, Life Tech 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 Life Tech Claim, except with respect to any claims arising out any breach of, or action to enforce, this Stipulation, and Life Tech 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 Life Tech 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, Life Tech shall be allowed to assert such claims as a defense in any litigation brought against Life Tech by the Debtor, the Debtor’s estate, the Liquidation Trustee, the Liquidation Trust, and/or the Reorganized Debtors.

7. 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.

Stipulated and Agreed,

Dated: September 29, 2025
Wilmington, Delaware

Respectfully submitted,

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill

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