

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

MOLECULAR TEMPLATES, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10739 (BLS)

(Jointly Administered)

**Objection Deadline:**

**September 23, 2025, at 4:00 p.m. (ET)**

**Hearing Date:**

**To Be Determined**

**FOURTH MONTHLY FEE APPLICATION (FOR THE PERIOD FROM JULY 1, 2025 THROUGH JULY 18, 2025) AND FINAL FEE APPLICATION OF MORRIS, NICHOLS, ARSHT & TUNNELL LLP, AS BANKRUPTCY COUNSEL FOR THE DEBTORS AND DEBTORS IN POSSESSION, FOR ALLOWANCE OF COMPENSATION AND FOR REIMBURSEMENT OF ALL ACTUAL AND NECESSARY EXPENSES INCURRED FOR THE PERIOD APRIL 20, 2025 THROUGH AND INCLUDING JULY 18, 2025**

Name of Professional:

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

Authorized to Provide  
Professional Services to:

Debtors and Debtors in Possession

Date of Retention:

May 16, 2025, *nunc pro tunc* to April 20, 2025

Monthly Period for which  
compensation and  
reimbursement is sought:

July 1, 2025 through July 18, 2025

Monthly Amount of compensation  
sought as actual, reasonable and  
necessary:

\$98,601.60 (80% of \$123,252.00)

<sup>1</sup> The Debtors in these chapter 11 cases, along with the Debtors' federal tax identification numbers, are: Molecular Templates, Inc. (9596) and Molecular Templates OpCo, Inc. (6035). The Liquidating Trustee's mailing address is: 124 Washington Street, Ste. 101 Foxboro, MA 02035. All Court filings can be accessed at: <https://www.veritaglobal.net/MolecularTemplates>.



2510739250902000000000003

Monthly Amount of reimbursement  
sought as actual, reasonable and  
necessary:

\$563.60

Final Period for which compensation  
and reimbursement is sought:

April 20, 2025 through July 18, 2025

Final Amount of compensation  
sought as actual, reasonable and  
necessary:

\$1,047,235.00

Final Amount of reimbursement  
sought as actual, reasonable and  
necessary:

\$9,759.68

This is a   x   monthly        Final   x   final application

If this is not the first Fee Application filed, disclose the following for each prior Fee Application:

<b>DATE FILED</b>	<b>PERIOD COVERED</b>	<b>REQUESTED FEES/EXPENSES</b>	<b>APPROVED FEES/EXPENSES</b>
6/11/25 D.I. 143	4/20/25-4/30/25	\$192,797.50/\$5,062.80	\$154,238.00/\$5,062.80
6/27/25 D.I. 158	5/1/25-5/31/25	\$361,692.50/\$2,170.40	\$289,354.00/\$2,170.40
7/21/25 D.I. 200	6/1/25-6/30/25	\$369,493.00/\$1,962.00	\$295,594.40/\$1,962.00

**MONTHLY COMPENSATION BY PROFESSIONAL****MOLECULAR TEMPLATES, INC., *et al.*****(Case No. 25-10739 (BLS))****July 1, 2025 through July 18, 2025**

<b>Name of Professional</b>	<b>Position of the Applicant, Area of Expertise, Number of Years in that Position, Year of Obtaining License to Practice</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Eric D. Schwartz	Partner/Bankruptcy. Partner since 2002. Joined firm as an associate in 1999. Member of the DE Bar since 1992.	1,525	25.1	38,277.50
Andrew R. Remming	Partner/Bankruptcy. Partner since 2016. Joined firm as an associate in 2008. Member of the DE Bar since 2008.	1,295	38.8	50,246.00
Brenna A. Dolphin	Special Counsel/Bankruptcy. Joined the firm as special counsel in 2023. Member of the DE Bar since 2011.	1,025	4.4	4,510.00
Luke Brzozowski	Associate/Bankruptcy. Joined the firm as an associate in 2024. Member of the DE Bar since 2024.	625	44.2	27,625.00
Desiree M. Vale	Paralegal	435	1.2	522.00
John J. Lawrence	Paralegal	435	2.8	1,218.00
Radha Chevli	Paralegal	435	0.9	391.50
Marie Reed	Legal Assistant	385	1.2	462.00
<b>Total</b>			<b>118.6</b>	<b>\$123,252.00</b>
<b>BLENDED RATE: \$1,039.22</b>				
<b>ATTORNEY BLENDED RATE: \$1,072.52</b>				

**MONTHLY COMPENSATION BY PROJECT CATEGORY**  
**MOLECULAR TEMPLATES, INC., *et al.***  
**(Case No. 25-10739 (BLS))**

**July 1, 2025 through July 18, 2025**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration	0.50	326.50
Creditor Communications and Meetings	0.90	809.50
Fee Applications (MNAT - Filing)	15.60	10,907.00
Fee Applications (Others - Filing)	5.90	5,168.50
Other Contested Matters	4.30	3,978.50
Financing Matters/Cash Collateral	9.60	9,514.00
Tax Matters	0.10	102.50
Insurance Matters	0.20	305.00
Vendor/Supplier Matters	0.10	129.50
Court Hearings	9.10	9,572.50
Claims Objections and Administration	0.40	340.00
Plan and Disclosure Statement	58.50	68,854.50
Professional Retention (Others - Filing)	2.40	2,036.00
General Case Strategy	2.80	2,150.00
Schedules/SOFA/U.S. Trustee Reports	7.80	8,561.00
Intellectual Property and Asset Review	0.40	497.00
<b>TOTAL</b>	<b>118.60</b>	<b>\$123,252.00</b>

**MONTHLY EXPENSE SUMMARY**

**MOLECULAR TEMPLATES, INC., *et al.***  
**(Case No. 25-10739 (BLS))**

**July 1, 2025 through July 18, 2025**

<b>Expense Category</b>	<b>Total Expenses</b>
Pacer	30.80
In-House Printing - color	92.80
In-House Printing - black & white	3.90
Courier/Delivery Service	121.00
Court Costs	46.00
Transcripts	269.10
<b>Grand Total Expenses</b>	<b>\$563.60</b>

**FINAL COMPENSATION BY PROFESSIONAL****MOLECULAR TEMPLATES, INC., *et al.*****(Case No. 25-10739 (BLS))****April 20, 2025 through July 18, 2025**

<b>Name of Professional</b>	<b>Position of the Applicant, Area of Expertise, Number of Years in that Position, Year of Obtaining License to Practice</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Eric D. Schwartz	Partner/Bankruptcy. Partner since 2002. Joined firm as an associate in 1999. Member of the DE Bar since 1992.	1,525	188.4	287,310.00
Matthew B. Harvey	Partner/Bankruptcy. Partner since 2020. Joined firm as associate from 2008 to Sept. 2013; rejoined the firm as an associate in Nov. 2014. Member of the DE Bar since 2008.	1,295	0.7	906.50
Andrew R. Remming	Partner/Bankruptcy. Partner since 2016. Joined firm as an associate in 2008. Member of the DE Bar since 2008.	1,295	235.1	304,454.50
Tarik J. Haskins	Partner/Commercial Litigation. Partner since 2012. Joined firm as an associate in 2006. Member of the DE Bar since 2003.	1,295	14.2	18,389.00
Todd A. Flubacher	Partner/Trust Law. Partner since 2008. Joined firm as an associate in 1999. Member of the DE Bar since 1999.	1,040	2.1	2,184.00
Daniel B. Butz	Senior Counsel/Bankruptcy. Joined the firm as an associate in 2002. Member of the DE Bar since 2002.	1,095	0.1	109.50
Brenna A. Dolphin	Special Counsel/Bankruptcy. Joined the firm as special counsel in 2023. Member of the DE Bar since 2011.	1,025	98.8	101,270.00
Kelly A. Miranda	Associate/Commercial. Joined the firm as an associate in 2018. Member of the DE Bar since 2018.	885	0.6	531.00
Scott D. Jones	Associate/Bankruptcy. Joined the firm as an associate in 2023. Member of the DE Bar since 2019.	855	1.7	1,453.50
Echo Qian	Associate/Bankruptcy. Joined the firm as an associate in 2023. Member of the DE Bar since 2023.	730	0.5	365.00

<b>Name of Professional</b>	<b>Position of the Applicant, Area of Expertise, Number of Years in that Position, Year of Obtaining License to Practice</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Austin Park	Associate/Bankruptcy. Joined the firm as an associate in 2023. Member of the DE Bar since 2023.	675	124.7	84,172.50
Jake Rauchberg	Associate/Bankruptcy. Joined the firm as an associate in 2024. Member of the PA Bar since 2023	675	69.3	46,777.50
Casey B. Sawyer	Associate/Bankruptcy. Joined the firm as an associate in 2023. Member of the DE Bar since 2023.	675	0.1	67.50
Staats Smith	Associate/Corporate Counseling. Joined the firm as an associate in 2023. Member of the DE Bar since 2023.	675	6.1	4,117.50
Luke Brzozowski	Associate/Bankruptcy. Joined the firm as an associate in 2024. Member of the DE Bar since 2024.	625	275.0	171,875.00
Nicholas Stackhouse	Summer Associate	625	1.6	1,000.00
Desiree M. Vale	Paralegal	435	10.2	4,437.00
John J. Lawrence	Paralegal	435	29.9	13,006.50
Radha Chevli	Paralegal	435	3.0	1,305.00
Amy Pellegrino	Legal Assistant	385	0.4	154.00
Marie Reed	Legal Assistant	385	7.5	2,887.50
Valerie Walker	Legal Assistant	385	1.2	462.00
<b>Total</b>			<b>1,071.2</b>	<b>\$1,047,235.00</b>
<b>BLENDED RATE: \$977.63</b>				
<b>ATTORNEY BLENDED RATE: \$1,005.87</b>				

**FINAL COMPENSATION BY PROJECT CATEGORY**  
**MOLECULAR TEMPLATES, INC., *et al.***  
**(Case No. 25-10739 (BLS))**

**April 20, 2025 through July 18, 2025**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration	8.6	6,224.00
Automatic Stay Matters	0.4	332.00
Creditor Communications and Meetings	11.6	12,089.00
Fee Applications (MNAT - Filing)	41.8	30,113.00
Fee Applications (Others - Filing)	9.6	7,582.00
Executory Contracts/Unexpired Leases	23.8	20,247.00
Other Contested Matters	6.4	6,391.00
Employee Matters	0.7	328.50
Financing Matters/Cash Collateral	91.3	97,177.50
Tax Matters	8.5	9,371.50
Insurance Matters	9.1	10,048.50
Vendor/Supplier Matters	1.9	1,696.50
Court Hearings	81.4	72,514.00
Claims Objections and Administration	28.0	24,444.00
Plan and Disclosure Statement	505.0	516,751.50
Professional Retention (MNAT - Filing)	15.4	12,175.50
Professional Retention (Others - Filing)	65.6	65,028.00
General Corporate Matters (including Corporate Governance)	18.4	17,112.00
General Case Strategy	72.8	65,878.00
Schedules/SOFA/U.S. Trustee Reports	60.4	60,199.00
Intellectual Property and Asset Review	10.5	11,532.50
Case Administration	8.6	6,224.00
<b>TOTAL</b>	<b>1,071.2</b>	<b>\$1,047,235.00</b>



**FINAL EXPENSE SUMMARY****MOLECULAR TEMPLATES, INC., *et al.***  
**(Case No. 25-10739 (BLS))****April 20, 2025 through July 18, 2025**

<b>Expense Category</b>	<b>Total Expenses</b>
Pacer	306.10
In-House Printing - black & white	2,058.20
In-House Printing - color	2,078.40
Courier/Delivery Service	258.00
Transcripts	900.90
Messenger Service	30.00
Court Costs	3,572.00
Non-Delaware Registered Agent Services	474.00
Computer Research - Westlaw	82.08
<b>Grand Total Expenses</b>	<b>\$9,759.68</b>

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

In re:

MOLECULAR TEMPLATES, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10739 (BLS)

(Jointly Administered)

**Objection Deadline:**

**September 23, 2025, at 4:00 p.m. (ET)**

**Hearing Date:**

**To Be Determined**

**FOURTH MONTHLY FEE APPLICATION (FOR THE PERIOD FROM JULY 1,  
2025 THROUGH JULY 18, 2025) AND FINAL FEE APPLICATION OF MORRIS,  
NICHOLS, ARSHT & TUNNELL LLP, AS BANKRUPTCY COUNSEL FOR THE  
DEBTORS AND DEBTORS IN POSSESSION, FOR ALLOWANCE OF  
COMPENSATION AND FOR REIMBURSEMENT OF ALL ACTUAL AND  
NECESSARY EXPENSES INCURRED FOR THE PERIOD  
APRIL 20, 2025 THROUGH AND INCLUDING JULY 18, 2025**

Morris, Nichols, Arsht & Tunnell LLP (“Morris Nichols”), as bankruptcy counsel for the debtors and debtors in possession in the above-captioned cases (the “Debtors”), submits this fee application (the “Fee Application”) for (i) allowance of reasonable compensation for professional services rendered by Morris Nichols to the Debtors for the period July 1, 2025 through July 18, 2025 (the “Monthly Period”); (ii) reimbursement of actual and necessary expenses and disbursements incurred by Morris Nichols during the Monthly Period in rendering professional services on behalf of the Debtors; (iii) final allowance of reasonable compensation for professional services rendered by Morris Nichols to the Debtors for the period April 20, 2025 through July 18,

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the Debtors’ federal tax identification numbers, are: Molecular Templates, Inc. (9596) and Molecular Templates OpCo, Inc. (6035). The Liquidating Trustee’s mailing address is: 124 Washington Street, Ste. 101 Foxboro, MA 02035. All Court filings can be accessed at: <https://www.veritaglobal.net/MolecularTemplates>.

2025 (the “Final Period”); and (iv) final reimbursement of actual and necessary expenses and disbursements incurred by Morris Nichols in rendering professional services on behalf of the Debtors during the Final Period pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), rule 2016-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, effective November 1, 2013 (the “U.S. Trustee Guidelines”) and the *Order Establishing Procedures for Final Compensation and Reimbursement of Expenses for Retained Professionals* (D.I. 96) (the “Final Compensation Procedures Order”).<sup>2</sup> In support of this Fee Application, Morris Nichols represents as follows:

### **JURISDICTION**

1. This Court has jurisdiction over this Fee Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested herein are sections 330 and 331 of the Bankruptcy Code, as supplemented by Bankruptcy Rule 2016, Local Rule 2016-1, the U.S. Trustee Guidelines, and the Final Compensation Procedures Order.

### **BACKGROUND**

3. On April 20, 2025 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code thereby commencing these chapter 11 cases. The Debtors continue to operate their businesses as debtors in possession pursuant to

---

<sup>2</sup> Capitalized terms used but not defined herein are defined in the Final Compensation Procedures Order.

sections 1107(a) and 1108 of the Bankruptcy Code. No Official Committee of Unsecured Creditors has been appointed (the “Creditors’ Committee”).

4. On July 7, 2025 (the “Confirmation Date”), the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”) entered the amended *Findings of Fact and Conclusions of Law, and Order (I) Approving the Disclosure Statement on a Final Basis and (II) Confirming the Revised Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization of Molecular Templates, Inc. and Its Affiliated Debtor* (D.I. 186) (the “Confirmation Order”), thereby confirming the *Combined Disclosure Statement and Chapter 11 Plan of Reorganization for Molecular Templates, Inc. and Its Affiliated Debtor* (D.I. 186-1) (together with the Plan Supplement (D.I. 147, 150), the “Plan”).

5. On July 18, 2025, the Debtors filed the *Notice of (I) Confirmation Order; (II) Effective Date; (III) Applicable Bar Dates for Filing Certain Claims; and (IV) Related Information* (D.I. 194), setting July 18, 2025 as the effective date of the Plan. The Plan and the Confirmation Order require certain estate professionals to file and serve final fee applications no later than September 2, 2025 (ET).

### **MORRIS NICHOLS’S RETENTION**

6. Prior to the commencement of these chapter 11 cases, the Debtors retained Morris Nichols to provide advice regarding, among other things, preparing for, commencing, and prosecuting these cases under chapter 11 of the Bankruptcy Code. On April 30, 2025, the Debtors filed the *Debtors’ Application for Entry of an Order Authorizing Retention and Employment of Morris, Nichols, Arsht & Tunnell LLP as Bankruptcy Counsel for the Debtors Nunc Pro Tunc to the Petition Date* (D.I. 58) (the “Morris Nichols Retention Application”).

7. On May 16, 2025, this Court granted the Morris Nichols Retention Application pursuant to the *Order Authorizing the Retention and Employment of Morris, Nichols,*

*Arsht & Tunnell LLP as Bankruptcy Counsel for the Debtors Nunc Pro Tunc to the Petition Date* (D.I. 90) (the “Morris Nichols Retention Order”).

### **RELIEF REQUESTED**

8. Morris Nichols submits this Application for (a) monthly and final allowance of reasonable compensation for the actual, reasonable, and necessary professional services that it has rendered as counsel for the Debtors in this case during the Monthly and Final Periods and (b) reimbursement of actual, reasonable, and necessary expenses incurred by Morris Nichols in representing the Debtors during the Monthly and Final Periods.

### **THE MONTHLY PERIOD**

9. During the Monthly Period, Morris Nichols incurred fees in the amount of \$123,252.00. For the same period, Morris Nichols incurred actual, reasonable, and necessary expenses totaling \$563.60. As of the date of this Fee Application, Morris Nichols has received no payments with respect to these amounts.

10. The Court entered the Final Compensation Procedures Order on May 19, 2025 (D.I. 96). The Final Compensation Procedures Order sets forth the procedures for Final compensation and reimbursement of expenses for all retained Professionals in these cases.

11. In particular, the Final Compensation Procedures Order provides that Professionals may file and serve a Monthly Fee Application following the month or months for which compensation is sought, for Final approval and allowance of compensation for services rendered and reimbursement of expenses incurred during the preceding months. Parties in interest will have 20 days (or the next business day if such day is not a business day) after the filing of a Monthly Fee Application (the “Objection Deadline”) to object to the requested compensation for services rendered and reimbursement of expenses incurred. Provided that there are no objections to such Monthly Fee Application filed before the expiration of the Objection Deadline, the

Professional may file a certificate of no objection (the “Certificate of No Objection”) with the Court.

12. Upon the filing of a Certificate of No Objection, the Debtors are authorized to pay such Professional 80 percent of the fees and 100 percent of the expenses requested in such Monthly Fee Application.

13. Set forth on the foregoing “Compensation by Project Category” is a summary, by subject matter category, of the time expended by Morris Nichols’s timekeepers billing time to the Debtors’ cases during the Monthly Period.

14. **Exhibit A** attached hereto contains logs, sorted by case project category, which show the time recorded by professionals, paraprofessionals, and other support staff, as well as descriptions of the services provided.

15. **Exhibit B** attached hereto contains a breakdown of actual, reasonable, and necessary expenses incurred by Morris Nichols during the Monthly Period.

16. Morris Nichols charges \$.10 per page for photocopying and printing. Morris Nichols does not charge for outgoing domestic facsimiles or incoming facsimiles.

17. In accordance with Local Rule 2016-1, Morris Nichols has reduced its request for compensation for non-working travel, if any, to 50% of its normal rate.

#### **THE FINAL PERIOD**

18. Morris Nichols seeks allowance of \$1,047,235.00, for actual, reasonable, and necessary legal services rendered to the Debtors during the Final Period; and \$9,759.68 as reimbursement of actual, reasonable, and necessary expenses incurred in connection with the rendition of such services during the Final Period. Morris Nichols requests that the Debtors be authorized and directed to pay Morris Nichols an amount equal to the sum of the allowed

compensation and expense reimbursement during the Final Period, less any amounts previously paid.

19. Morris Nichols has endeavored to represent the Debtors in the most expeditious and economical manner possible. Tasks have been assigned to attorneys, paralegals, and other support staff at Morris Nichols so that work has been performed by those most familiar with the particular matter or task and, where attorney or paralegal involvement was required, by the lowest hourly rate professional appropriate for a particular matter. Moreover, Morris Nichols has endeavored to coordinate with the other professionals involved in these cases so as to minimize any duplication of effort and to minimize attorneys' fees and expenses to the Debtors. Morris Nichols believes it has been successful in this regard.

20. **Exhibit C** attached hereto contains the Application Summary which details the fees and expenses incurred, paid, and outstanding during the Final Period.

21. **Exhibit D** attached hereto contains the Staffing Plan which provides information relating to the timekeepers who assisted with this chapter 11 case through the Final Period.

22. No agreement or understanding exists between Morris Nichols and any other person for the sharing of compensation received or to be received for services rendered in or in connection with these cases.

23. The undersigned has reviewed the requirements of Local Rule 2016-1 and certifies to the best of his or her information, knowledge, and belief that this Fee Application complies with that Rule.

**INFORMATION RELATED TO THE REVISED U.S. TRUSTEE GUIDELINES**

24. Morris Nichols provides the following information pursuant to the U.S. Trustee Guidelines.

25. Morris Nichols's hourly rates for bankruptcy services are comparable to the hourly rates charged in complex chapter 11 cases by comparably skilled bankruptcy attorneys. In addition, Morris Nichols's hourly rates for bankruptcy services are comparable to the rates charged by Morris Nichols, and by comparably skilled practitioners in other firms, for complex corporate and litigation matters, whether in court or otherwise, regardless of whether a fee application is required.

26. The blended hourly rate for all Morris Nichols timekeepers who worked on these cases is approximately the same as the firm's blended rate for all timekeepers over the Final Period. In particular, the blended hourly rate for all Morris Nichols timekeepers (including both professionals and paraprofessionals) who billed to matters excluding chapter 11 representations (collectively, the "Non-Chapter 11 Matters") during the Final Period was, in the aggregate, approximately \$908.05. By comparison, the blended hourly rate for all Morris Nichols timekeepers (including both professionals and paraprofessionals) who worked on these cases during the Final Period was, in the aggregate, \$977.63.

27. The following table shows blended hourly rates by category of professional and paraprofessional (rounded to the nearest dollar) in the Fee Application and in comparison to the blended hourly rate for Morris Nichols's Non-Chapter 11 Matters during the Final Period:

<b>Position at Morris Nichols</b>	<b>Blended Hourly Rate for Application Period</b>	<b>Blended Hourly Rate Non-Chapter 11 Matters</b>
Partner	\$1,392	\$1,183
Special Counsel	\$1,025	\$886
Associate	\$647	\$687
Paraprofessional	\$426	\$316



27. In addition, Morris Nichols provides the following responses to the inquiries stated in section C.5 of the Revised U.S. Trustee Guidelines:

- a. Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain. **No.**
- b. If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client? **Not applicable.**
- c. Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case? **No.**
- d. Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.). If so, please quantify by hours and fees. **No.**
- e. Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees. **No.**
- f. If the fee application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? and (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458? **No.**

#### **NOTICE**

28. Notice of this Application will be provided in accordance with the procedures set forth in the Final Compensation Procedures Order and the Confirmation Order. Morris Nichols respectfully submits that no further notice is required.

**WHEREFORE**, Morris Nichols respectfully requests that this Court (i) allow Morris Nichols (a) monthly compensation in the amount of \$123,252.00 for actual, reasonable, and necessary professional services rendered on behalf of the Debtors during the Monthly Period, and (b) monthly reimbursement in the amount of \$563.60 for actual, reasonable, and necessary

expenses incurred during the Monthly Period; (ii) allow Morris Nichols (a) final compensation in the amount of \$1,047,235.00 for actual, reasonable, and necessary services rendered during the Final Period, and (b) final reimbursement in the amount of \$9,759.68 for actual, reasonable, and necessary expenses incurred during the Final Period, (c) authorize and direct the Liquidating Trust, as appropriate, to pay Morris Nichols an amount equal to the sum of such allowed compensation and reimbursement, less any amounts previously paid by the Debtors; and (iii) grant such other further relief as the Court deems just and proper.

Dated: September 2, 2025  
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

/s/ Luke Brzozowski

Eric D. Schwartz (No. 3134)  
Andrew R. Remming (No. 5120)  
Brenna A. Dolphin (No. 5604)  
Luke Brzozowski (No. 7377)  
1201 N. Market Street, 16th Floor  
Wilmington, Delaware 19801  
Telephone: (302) 658-9200  
Facsimile: (302) 658-3989  
eschwartz@morrisnichols.com  
aremming@morrisnichols.com  
bdolphin@morrisnichols.com  
lbrzozowski@morrisnichols.com

*Counsel to the Debtors and Debtors in Possession*

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

In re:

MOLECULAR TEMPLATES, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10739 (BLS)

(Jointly Administered)

**Objection Deadline:**

**September 23, 2025, at 4:00 p.m. (ET)**

**Hearing Date:**

**To Be Determined**

**NOTICE OF FOURTH MONTHLY FEE APPLICATION (FOR THE PERIOD  
FROM JULY 1, 2025 THROUGH JULY 18, 2025) AND FINAL FEE  
APPLICATION OF MORRIS, NICHOLS, ARSHT & TUNNELL LLP, AS  
BANKRUPTCY COUNSEL FOR THE DEBTORS AND DEBTORS IN  
POSSESSION, FOR ALLOWANCE OF COMPENSATION AND FOR  
REIMBURSEMENT OF ALL ACTUAL AND NECESSARY EXPENSES  
INCURRED FOR THE PERIOD  
APRIL 20, 2025 THROUGH AND INCLUDING JULY 18, 2025**

**PLEASE TAKE NOTICE** that today, Morris, Nichols, Arsht & Tunnell LLP, as bankruptcy counsel for the debtors and debtors in possession in the above-captioned cases, filed the attached *Fourth Monthly Fee Application (for the Period from July 1, 2025 Through July 18, 2025) and Final Fee Application of Morris, Nichols, Arsht & Tunnell LLP, as Bankruptcy Counsel for the Debtors and Debtors in Possession, for Allowance of Compensation and for Reimbursement of All Actual and Necessary Expenses Incurred for the Period April 20, 2025 through and Including July 18, 2025* (the “Fee Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Fee Application, must be: (a) filed with the Clerk of the Bankruptcy Court, 824 North Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801, by **September 23, 2025, at 4:00 p.m. (Eastern Time)** (the “Objection Deadline”); and (b) served so as to be received on or before the Objection Deadline by:

- (i) the applicant, Morris, Nichols, Arsht & Tunnell LLP, 1201 North Market

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the Debtors’ federal tax identification numbers, are: Molecular Templates, Inc. (9596) and Molecular Templates OpCo, Inc. (6035). The Liquidating Trustee’s mailing address is: 124 Washington Street, Ste. 101 Foxboro, MA 02035. All Court filings can be accessed at: <https://www.veritaglobal.net/MolecularTemplates>.

Street, 16th Floor, Wilmington, DE 19801, Attn: Eric D. Schwartz (eschwartz@morrisnichols.com), and Andrew R. Remming (aremming@morrisnichols.com);

- (ii) the Liquidating Trust, c/o Verdolino & Lowey, P.C., 124 Washington Street, Suite 101, Foxboro, MA 20235, Attn: Craig Jalbert (cjalbert@vplc.com);
- (iii) counsel to K2 Health Ventures LLC, (i) Sidley Austin LLP, 1999 Avenue of the Stars, Floor 17, Los Angeles CA 90067, Attn: Samuel Newman (sam.newman@sidley.com) and (ii) Polsinelli PC, 222 Delaware Avenue, Suite 1101, Wilmington, DE 19801, Attn: Christopher A. Ward (cward@polsinelli.com); and
- (iv) the U.S. Trustee, Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801 Attn: Jane M. Leamy (jane.m.leafy@usdoj.gov).

A HEARING ON THE APPLICATION (THE “HEARING”) BEFORE THE HONORABLE BRENDAN L. SHANNON, UNITED STATES BANKRUPTCY COURT JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 6<sup>TH</sup> FLOOR, COURTROOM #1 WILMINGTON DELAWARE 19801, WILL TAKE PLACE ON **A DATE TO BE DETERMINED**. IF THE HEARING IS TO BE HELD BY ZOOM VIDEOCONFERENCE, INSTRUCTIONS TO APPEAR BY ZOOM WILL BE PROVIDED IN THE AGENDA PRIOR TO THE HEARING.

ONLY OBJECTIONS MADE IN WRITING AND TIMELY FILED AND RECEIVED, IN ACCORDANCE WITH THE PROCEDURES ABOVE, WILL BE CONSIDERED BY THE COURT AT THE HEARING.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: September 2, 2025  
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

/s/ Luke Brzozowski

Eric D. Schwartz (No. 3134)  
Andrew R. Remming (No. 5120)  
Brenna A. Dolphin (No. 5604)  
Luke Brzozowski (No. 7377)  
1201 N. Market Street, 16th Floor  
Wilmington, Delaware 19801  
Telephone: (302) 658-9200  
Facsimile: (302) 658-3989  
eschwartz@morrisnichols.com  
aremming@morrisnichols.com  
bdolphin@morrisnichols.com  
lbrzozowski@morrisnichols.com

*Counsel to the Debtors and Debtors in Possession*

**EXHIBIT A****COMPENSATION BY PROJECT CATEGORY****MOLECULAR TEMPLATES, INC., *et al.***  
**(Case No. 25-10739 (BLS))****July 1, 2025 through July 18, 2025**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration	0.50	326.50
Creditor Communications and Meetings	0.90	809.50
Fee Applications (MNAT - Filing)	15.60	10,907.00
Fee Applications (Others - Filing)	5.90	5,168.50
Other Contested Matters	4.30	3,978.50
Financing Matters/Cash Collateral	9.60	9,514.00
Tax Matters	0.10	102.50
Insurance Matters	0.20	305.00
Vendor/Supplier Matters	0.10	129.50
Court Hearings	9.10	9,572.50
Claims Objections and Administration	0.40	340.00
Plan and Disclosure Statement	58.50	68,854.50
Professional Retention (Others - Filing)	2.40	2,036.00
General Case Strategy	2.80	2,150.00
Schedules/SOFA/U.S. Trustee Reports	7.80	8,561.00
Intellectual Property and Asset Review	0.40	497.00
<b>TOTAL</b>	<b>118.60</b>	<b>\$123,252.00</b>

**Time Detail****Task Code:** B110 Case Administration

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/01/25	Lawrence, John	Update docket folder with order approving second rejection motion and email Verita with service instructions.	0.1	43.50
07/02/25	Lawrence, John	File request for certification of confirmation order with Court.	0.2	87.00
07/07/25	Schwartz, Eric D.	Review Notice of filing fees and A. Remming, L. Brzozowski emails regarding same.	0.1	152.50
07/15/25	Lawrence, John	Review and approved Reliable 7.1.25 hearing transcript invoice for processing.	0.1	43.50
<b>Total</b>			<b>0.5</b>	<b>326.50</b>

**Task Code:** B150 Creditor Communications and Meetings

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/07/25	Schwartz, Eric D.	Review J. Doyle, L. Brzozowski emails regarding Iron Mountain.	0.1	152.50
07/07/25	Brzozowski, Luke	Emails with Iron Mountain re: record storage (.1); review company records/database re: same (.2); review Iron Mountain Inventory report (.2); email MNAT team re: same (.1).	0.6	375.00
07/10/25	Schwartz, Eric D.	Review C. Cable, L. Viera emails regarding Iron Mountain.	0.1	152.50
07/10/25	Remming, Andrew	Review email from C. Cable re: document storage issue.	0.1	129.50
<b>Total</b>			<b>0.9</b>	<b>809.50</b>

**Task Code:** B160 Fee Applications (MNAT - Filing)

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/01/25	Vale, Desiree	Review CNO to Morris Nichols First Fee Application.	0.2	87.00
07/01/25	Chevli, Radha	Review MNAT First Fee Application and prepare the draft CNO re: First Fee Application of MNAT for review.	0.3	130.50
07/01/25	Brzozowski, Luke	Review and revise CNO re: first fee application.	0.2	125.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/02/25	Chevli, Radha	Finalize and file the CNO re: MNAT's First Fee Application.	0.1	43.50
07/02/25	Remming, Andrew	Review update re: CNO for MNAT fee application from L. Brzozowski.	0.1	129.50
07/02/25	Remming, Andrew	Further emails re: CNO for MNAT fee application with L. Brzozowski.	0.1	129.50
07/02/25	Brzozowski, Luke	Email to MNAT team re: CNO to MNAT's fee app.	0.1	62.50
07/02/25	Brzozowski, Luke	Finalize and prepare to file CNO to MNAT's first fee application (.1); email to C. Jalbert re: same (.1).	0.2	125.00
07/02/25	Brzozowski, Luke	Review interim compensation order (.1); email to C. Jalbert re: same (.2).	0.3	187.50
07/02/25	Schwartz, Eric D.	Review L. Brzozowski, A. Remming emails regarding MNAT fee application w/ attachment (.1), review further C. Jalbert, L. Brzozowski emails regarding same (.1).	0.2	305.00
07/02/25	Schwartz, Eric D.	Review Second Monthly Fee Application of Morris, Nichols, Arsht & Tunnell LLP, as Bankruptcy Counsel for the Debtors and Debtors in Possession, for Allowance of Monthly Compensation and for Reimbursement of All Actual and Necessary Expenses Incurred for the period May 1, 2025 to May 31, 2025.	0.3	457.50
07/07/25	Brzozowski, Luke	Email to accounting re: June fee app.	0.1	62.50
07/11/25	Brzozowski, Luke	Review and revise exhibit to June fee application for privilege and confidentiality.	4.3	2,687.50
07/14/25	Brzozowski, Luke	Review and revise exhibit to June fee application for privilege and confidentiality.	3.6	2,250.00
07/16/25	Brzozowski, Luke	Confer with A. Remming re: June and July fee apps (.1); email to A. Bruce re: same (.1); emails with MNAT team re: same (.1).	0.3	187.50
07/16/25	Remming, Andrew	Emails with L. Brzozowski re: draft MNAT June fee application.	0.1	129.50
07/17/25	Brzozowski, Luke	Draft CNO to MNAT's second monthly fee app.	0.2	125.00
07/17/25	Remming, Andrew	Review and edit draft of MNAT June fee application.	0.4	518.00



<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/18/25	Lawrence, John	Draft June 2025 MNAT fee application.	2.0	870.00
07/18/25	Schwartz, Eric D.	Review L. Brzozowski, A. Remming emails regarding MNAT second Monthly fee application and L. Brzozowski email to C. Jalbert regarding same and C. Jalbert emails regarding same.	0.1	152.50
07/18/25	Brzozowski, Luke	Email to MNAT team re: second monthly fee app (.1); email to R. Chevli re: same (.1).	0.2	125.00
07/18/25	Brzozowski, Luke	Communications with A. Bruce (.2) and J. Lawrence re: June fee application (.1).	0.3	187.50
07/18/25	Brzozowski, Luke	Review interim compensation procedures (.1) and emails with J. Lawrence re: same and June fee app (.1).	0.2	125.00
07/18/25	Brzozowski, Luke	Email to C. Jalbert re: CNO to MNAT's May fee app.	0.1	62.50
07/18/25	Chevli, Radha	Check the docket for objection to MNAT's Second Monthly Fee Application and communicate with L. Brzozowski regarding draft CNO for MNAT's Second Monthly Fee Application.	0.2	87.00
07/18/25	Chevli, Radha	Finalize and File CNO re: MNAT's Second Monthly Fee Application (.2); conduct docket search and update docket folder (.1).	0.3	130.50
07/18/25	Remming, Andrew	Review and edit revised draft of MNAT June fee application.	0.4	518.00
07/18/25	Remming, Andrew	Review and edit further revised version of draft MNAT June fee application.	0.7	906.50
<b>Total</b>			<b>15.6</b>	<b>10,907.00</b>

**Task Code:** B165 Fee Applications (Others - Filing)

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/01/25	Brzozowski, Luke	Review and revise Rock Creek's first fee application (.5); email to MNAT team re: same (.1).	0.6	375.00
07/01/25	Schwartz, Eric D.	Review L. Brzozowski, B. Dolphin emails (w/ attachment) of draft of first Rock Creek fee application.	0.2	305.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/02/25	Remming, Andrew	Review update from L. Brzozowski re: draft Rock Creek fee application.	0.1	129.50
07/02/25	Schwartz, Eric D.	Review L. Brzozowski email to B. Ayers and P. Donnelly regarding Rock Creek's first fee application.	0.1	152.50
07/03/25	Vale, Desiree	Conference with L. Brzozowski re: Rock Creek First Fee Application e-filing (.1); update same (.2); prepare and e-file same (.4); coordinate service (.1); download pleading and file it in the docket folder (.1); calendar objection deadline (.1).	1.0	435.00
07/03/25	Brzozowski, Luke	Finalize and prepare to file and serve Rock Creek's first fee application (.2); emails with Rock Creek re: same (.1).	0.3	187.50
07/03/25	Schwartz, Eric D.	Review B. Ayers, L. Brzozowski emails regarding Rock Creek fee application.	0.1	152.50
07/03/25	Remming, Andrew	Review draft of Rock Creek fee application (.2) and emails re: same from B. Ayers (.1).	0.3	388.50
07/03/25	Brzozowski, Luke	Conference with D. Vale re: Rock Creek First Fee Application e-filing.	0.1	62.50
07/14/25	Schwartz, Eric D.	Review L. Brzozowski and A. Remming emails regarding PSD fees.	0.1	152.50
07/14/25	Dolphin, Brenna	Review draft ordinary course professional fees and expenses statement (April 20 - June 30, 2025) (.1); discuss same with L. Brzozowski (.1).	0.2	205.00
07/14/25	Remming, Andrew	Review analysis of OCP issues from L. Brzozowski.	0.1	129.50
07/14/25	Brzozowski, Luke	Review professional fees/invoices (.2); email to MNAT team, C. Jalbert, and Rock Creek re: same (.2); further email C. Jalbert re: OCP fees (.1).	0.5	312.50
07/14/25	Brzozowski, Luke	Draft first OCP fee and expense statement (.4); email same to B. Dolphin re: same (.2).	0.6	375.00
07/14/25	Remming, Andrew	Review draft of first OCP statement (.1); and emails re same with L. Brzozowski (.1) review invoices from DIP lenders' counsel (.1) and emails re same with Sidley team and L. Brzozowski (.1); review additional analysis re OCP issues (.1) and emails re same with L. Brzozowski (.1)	0.6	777.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/14/25	Brzozowski, Luke	Discuss draft ordinary course professional fees and expenses statement (April 20 - June 30, 2025) with B. Dolphin.	0.1	62.50
07/15/25	Schwartz, Eric D.	Review L. Brzozowski, A. Remming emails regarding PSD fees.	0.1	152.50
07/15/25	Remming, Andrew	Review email from L. Brzozowski re: OCP issues.	0.1	129.50
07/15/25	Remming, Andrew	Emails with L. Brzozowski re: OCP issues.	0.1	129.50
07/18/25	Schwartz, Eric D.	Review A. Gorman email with attachment of Verita Fee Application (.1), review L. Brzozowski email w/ attachment regarding revised Verita Fee Application (.1).	0.2	305.00
07/18/25	Brzozowski, Luke	Review Verita's fee app (.3); email to MNAT team re: same (.1).	0.4	250.00
<b>Total</b>			<b>5.9</b>	<b>5,168.50</b>

**Task Code:** B190 Other Contested Matters

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/16/25	Brzozowski, Luke	Draft motion to extend removal deadline of state court actions (.6); review and revise re: same (.3); email to B. Dolphin re: same (.1); further revise same per B. Dolphin comments (.2); email same to MNAT team (.1).	1.3	812.50
07/16/25	Dolphin, Brenna	Review draft motion to extend removal deadline (.6); confer with L. Brzozowski re: same (.1).	0.7	717.50
07/16/25	Remming, Andrew	Review and edit draft of removal motion (.2) and emails re: same with L. Brzozowski (.1).	0.3	388.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/18/25	Schwartz, Eric D.	Review L. Brzozowski email regarding removal and respond to same (.1), review email from L. Brzozowski w/ attachment of draft removal motion (.1), emails to and from L. Brzozowski and A. Remming regarding same given confirmation (.1), review B. Dolphin email w/ attachment of revised removal motion with confirmation/effective date language and review BSA removal motion regarding same from B. Dolphin (.2).	0.5	762.50
07/18/25	Brzozowski, Luke	Emails with E. Schwartz re: removal extension motion.	0.2	125.00
07/18/25	Brzozowski, Luke	Research issue re: confirmation and removal deadline (.3); review B. Dolphin email re: same (.1).	0.4	250.00
07/18/25	Dolphin, Brenna	Review and revise draft motion to extend removal deadline (.7); discuss proposed language internally with E. Schwartz, A. Remming, and L. Brzozowski (.2).	0.9	922.50
<b>Total</b>			<b>4.3</b>	<b>3,978.50</b>

**Task Code:** B230 Financing Matters/Cash Collateral

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/01/25	Remming, Andrew	Review email from JL Miller re: lender invoices.	0.1	129.50
07/01/25	Schwartz, Eric D.	Review J. L. Miller email w/ attachments of Lender Fees.	0.1	152.50
07/02/25	Remming, Andrew	Review update from L. Brzozowski re: lender invoices.	0.1	129.50
07/02/25	Remming, Andrew	Emails with L. Brzozowski re: budget issues.	0.1	129.50
07/02/25	Remming, Andrew	Review further emails from C. Jalbert and L. Brzozowski re: lender invoices.	0.1	129.50
07/02/25	Brzozowski, Luke	Emails with MNAT, Sidley, Rock Creek, and C. Jalbert re: professional fees.	0.2	125.00
07/02/25	Schwartz, Eric D.	Review L. Brzozowski, A. Remming emails w/ attachment regarding lender fees.	0.1	152.50
07/02/25	Schwartz, Eric D.	Review C. Jalbert email regarding lenders fees.	0.1	152.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/03/25	Brzozowski, Luke	Draft notice of discretionary draw letter.	0.3	187.50
07/03/25	Schwartz, Eric D.	Review ShareFile Activity Notification regarding Lender Fees.	0.1	152.50
07/07/25	Dolphin, Brenna	Meet with L. Brzozowski re: final DIP draw and draw request draft.	0.1	102.50
07/07/25	Brzozowski, Luke	Further review and revise third borrowing notice (.1); email to B. Dolphin re: same (.1).	0.2	125.00
07/07/25	Brzozowski, Luke	Meet with B. Dolphin re: final DIP draw and draw request draft.	0.1	62.50
07/08/25	Schwartz, Eric D.	Review L. Brzozowski, A. Remming, B. Ayers emails (w/ attachment) regarding third draw letter (.1), review further A. Remming, L. Brzozowski, P. Donnelly emails regarding same (.1).	0.2	305.00
07/08/25	Brzozowski, Luke	Confer with A. Remming re: discretionary draw (.1); email to C. Jalbert re: same (.1); finalize and send executed copy to Rock Creek (.1).	0.3	187.50
07/08/25	Remming, Andrew	Review email from P. Donnelly re: draft borrowing notice.	0.1	129.50
07/08/25	Remming, Andrew	Review draft borrowing notice (.2) and emails re: same with L. Brzozowski (.1).	0.3	388.50
07/08/25	Remming, Andrew	Review and respond to email from L. Brzozowski re: draw request.	0.1	129.50
07/08/25	Remming, Andrew	Office conf with L. Brzozowski re: LTA and DIP draw request.	0.1	129.50
07/09/25	Schwartz, Eric D.	Review J. Gansman emails regarding discussions with K2 regarding funding, DIP draws and wind down budget.	0.1	152.50
07/09/25	Remming, Andrew	Emails with E. Schwartz re: DIP draw request.	0.1	129.50
07/10/25	Dolphin, Brenna	Email Polsinelli (K2 Delaware counsel) to request June professional fee invoice.	0.1	102.50
07/10/25	Dolphin, Brenna	Confer with A. Remming and L. Brzozowski re: wind down budget analysis.	0.3	307.50
07/10/25	Brzozowski, Luke	Emails with C. Jalbert and Rock Creek team re: wind down budget.	0.2	125.00
07/10/25	Remming, Andrew	Review email from C. Jalbert re: borrowing certificate.	0.1	129.50
07/10/25	Remming, Andrew	Review update from E. Schwartz re: DIP borrowing request.	0.1	129.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/10/25	Dolphin, Brenna	Review update from Rock Creek (J. Gansman) re K2 fees and budgeting.	0.1	102.50
07/10/25	Remming, Andrew	Confer with B. Dolphin and L. Brzozowski re: wind down budget analysis.	0.3	388.50
07/10/25	Brzozowski, Luke	Confer with B. Dolphin and A. Remming re: wind down budget analysis.	0.3	187.50
07/11/25	Brzozowski, Luke	Emails with A. Remming re: professional fees and wind down budget (.2); email to C. Jalbert and Rock Creek team re: same (.2).	0.4	250.00
07/11/25	Schwartz, Eric D.	Review C. Pratt, J. Oosthuizen, L. Brzozowski emails regarding professional fees (.1), and A. Remming, L. Brzozowski emails regarding wind-down budget (.1).	0.2	305.00
07/11/25	Schwartz, Eric D.	Review A. Remming, L. Brzozowski and JL Miller emails regarding final DIP draw and respond thereto (.1), and review and respond to further A. Remming and L. Brzozowski emails regarding same (.1), review further L. Brzozowski emails regarding same (.1).	0.3	457.50
07/11/25	Remming, Andrew	Emails with L. Brzozowski re: wind down budget issues.	0.1	129.50
07/14/25	Schwartz, Eric D.	Review L. Brzozowski email regarding wind down budget (.1), review L. Brzozowski email to Sidley regarding same and JL Miller email responding thereto (.1), review S. Katona email regarding fees (.1).	0.3	457.50
07/14/25	Schwartz, Eric D.	Review Sidley and Ankura's invoices (.2), review B. Ayers and KCC invoicing emails and review further L. Brzozowski email regarding Sidley and Ankura/Ropes fees (.1), review MNAT invoices (.2).	0.5	762.50
07/14/25	Remming, Andrew	Review email from S. Katona re: DIP lender fee estimates.	0.1	129.50
07/14/25	Remming, Andrew	Review update from L. Brzozowski re: DIP draw request.	0.1	129.50
07/14/25	Remming, Andrew	Emails with E. Schwartz and L. Brzozowski re: lender fees.	0.1	129.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/14/25	Brzozowski, Luke	Email to Rock Creek and C. Jalbert re: wind down budget (.1); emails with Sidley re: same (.1).	0.2	125.00
07/14/25	Remming, Andrew	Review update from B. Ayers re: budget.	0.1	129.50
07/17/25	Brzozowski, Luke	Email to Rock Creek and C. Jalbert re: wind down budget (.1); review updated claims analysis with revised budget (.2); attend call with Rock Creek, C. Jalbert and MNAT re: same (.2). Follow up call w/ E. Schwartz and A. Remming re: same (.1).	0.6	375.00
07/17/25	Brzozowski, Luke	Draft revised draw language (.1); email to MNAT team re: same (.1); call with A. Remming and E. Schwartz re: same (.2); revise draw language per A. Remming and E. Schwartz comments (.2); and email to A. Remming and E. Schwartz re: same (.1).	0.7	437.50
07/18/25	Brzozowski, Luke	Emails with A. Remming and E. Schwartz re: revised borrowing notice and next steps.	0.3	187.50
07/18/25	Brzozowski, Luke	Further revise borrowing notice.	0.2	125.00
07/18/25	Brzozowski, Luke	Emails with C. Jalbert re: revised borrowing notice.	0.2	125.00
07/18/25	Brzozowski, Luke	Emails with Sidley re: wind-down budget.	0.1	62.50
07/18/25	Brzozowski, Luke	Calls with E. Schwartz (.1) and A. Remming (.1) re: revised budget and response to Sidley.	0.2	125.00
07/18/25	Brzozowski, Luke	Emails with Sidley re: revised borrowing notice (.2); revise borrowing notice per Sidley's comments (.1).	0.3	187.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/18/25	Remming, Andrew	Tele with L. Brzozowski re: DIP draw request.	0.1	129.50
<b>Total</b>			<b>9.6</b>	<b>9,514.00</b>

**Task Code:** B240 Tax Matters

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/17/25	Dolphin, Brenna	Confer with Rock Creek, C. Jalbert, and internally re: June monthly operating reports for both debtors.	0.1	102.50
<b>Total</b>			<b>0.1</b>	<b>102.50</b>

**Task Code:** B260 Insurance Matters

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/01/25	Schwartz, Eric D.	Review A. Remming, B. Ayers, P. Miller emails regarding D&O Insurance.	0.1	152.50
07/02/25	Schwartz, Eric D.	Review C. Brandt, et al., emails regarding insurance.	0.1	152.50
<b>Total</b>			<b>0.2</b>	<b>305.00</b>

**Task Code:** B290 Vendor/Supplier Matters

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/07/25	Remming, Andrew	Review emails re: vendor issues from L. Brzozowski.	0.1	129.50
<b>Total</b>			<b>0.1</b>	<b>129.50</b>

**Task Code:** B300 Court Hearings



<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/01/25	Schwartz, Eric D.	Meet with C. Jalbert and A. Remming in preparation for hearing (.1), prepare for hearing (UST Release Argument) (.5), tele. w/ J.L. Miller and A. Remming regarding hearing (.1), further conf. w/ C. Jalbert and A. Remming regarding call with J.L. Miller and hearing (.1), review motion for leave and reply to UST for argument (.2), conf. w/ L. Brzozowski regarding hearing and preparation (.1).	1.1	1,677.50
07/01/25	Lawrence, John	Prepare materials for 7/1 hearing.	0.2	87.00
07/01/25	Dolphin, Brenna	Confer with L. Brzozowski re: confirmation hearing and status of preparation for same.	0.1	102.50
07/01/25	Dolphin, Brenna	Coordinate with A. Pellegrino re: confirmation hearing registrations.	0.1	102.50
07/01/25	Brzozowski, Luke	Confer with A. Remming re: 7/1 confirmation hearing prep (.1); prepare for same (1.5); attend 7/1 confirmation hearing (2.0); email to G. Matthews re: hearing transcript (.1).	3.7	2,312.50
07/01/25	Schwartz, Eric D.	Attend confirmation hearing (2.0) and meet with C. Jalbert and A. Remming post-confirmation hearing (.5).	2.5	3,812.50
07/01/25	Remming, Andrew	Meet with C. Jalbert and E. Schwartz in preparation for hearing (.1), tele. w/ J.L. Miller and E. Schwartz regarding hearing (.1), further conf. w/ C. Jalbert and E. Schwartz regarding call with J.L. Miller and hearing (.1).	0.3	388.50
07/01/25	Brzozowski, Luke	Conf. w/ E. Schwartz regarding hearing and preparation.	0.1	62.50
07/01/25	Brzozowski, Luke	Confer with B. Dolphin re: confirmation hearing and status of preparation for same.	0.1	62.50
07/01/25	Remming, Andrew	Confer with L. Brzozowski re: 7/1 confirmation hearing prep.	0.1	129.50
07/01/25	Remming, Andrew	Meet with C. Jalbert and E. Schwartz post-confirmation hearing.	0.5	647.50
07/02/25	Brzozowski, Luke	Email J. Lawrence re: certified copies of the confirmation order.	0.1	62.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/09/25	Brzozowski, Luke	Emails with Reliable (.1) and Sidley (.1) re: 7/1 confirmation hearing.	0.2	125.00
<b>Total</b>			<b>9.1</b>	<b>9,572.50</b>

**Task Code:** B310 Claims Objections and Administration

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/02/25	Brzozowski, Luke	Review professional fees and claims analysis (.2); email to A. Remming and E. Schwartz re: same (.1).	0.3	187.50
07/07/25	Schwartz, Eric D.	Review Supplemental Service regarding Bar Dates.	0.1	152.50
<b>Total</b>			<b>0.4</b>	<b>340.00</b>

**Task Code:** B320 Plan and Disclosure Statement

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/01/25	Lawrence, John	Finalize and file revised confirmation order.	0.2	87.00
07/01/25	Remming, Andrew	Prepare for (2.1) and attend confirmation hearing (2.0).	4.1	5,309.50
07/01/25	Remming, Andrew	Review revised draft of confirmation order following hearing (.2) and emails re: same with E. Schwartz and L. Brzozowski (.1).	0.3	388.50
07/01/25	Remming, Andrew	Review update from L. Brzozowski re: revised confirmation order.	0.1	129.50
07/01/25	Brzozowski, Luke	Review and revise confirmation order based on comments from 7/1 hearing (.2); email to U.S. Trustee re: same (.1); finalize and prepare to file re: same (.2).	0.5	312.50
07/01/25	Schwartz, Eric D.	Review case law in preparation for hearing (.3), conf. w/ L Brzozowski regarding same (.1), further review prior reply to UST and case law (.2), further conf. w/ L. Brzozowski regarding same (.1), further conf. w/ A. Remming regarding confirmation hearing (.1).	0.8	1,220.00
07/01/25	Schwartz, Eric D.	Review L. Brzozowski email w/ attachment regarding DOJ and SEC comments to proposed confirmation order.	0.1	152.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/01/25	Schwartz, Eric D.	Review L. Brzozowski emails (internal, to C. Jalbert, et al., J. Leamy, Sidley) regarding revised post hearing form of confirmation order for submission (.1), respond thereto and review further L. Brzozowski and A. Remming emails regarding same (.1), review as filed proposed final version of confirmation order (.3), emails to and from J. Lawrence regarding same (.1).	0.6	915.00
07/01/25	Brzozowski, Luke	Conf. w/ E. Schwartz regarding case law (.1), further conf. w/ E. Schwartz regarding prior reply to UST and case law (.1).	0.2	125.00
07/01/25	Remming, Andrew	Further conf. w/ E. Schwartz regarding confirmation hearing.	0.1	129.50
07/02/25	Reed, Marie	Review and respond to email from L. Brzozowski re: filing COC (.1); prepare and e-file Certification of Counsel Regarding Amended Findings of Fact, Conclusions of Law, and Order (I) Approving the Disclosure Statement on a Final Basis and (II) Confirming the Revised Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization for Molecular Templates, Inc. and Its Affiliated Debtor and upload order (.2).	0.3	115.50
07/02/25	Remming, Andrew	Tele with E. Schwartz re: revised confirmation order.	0.1	129.50
07/02/25	Remming, Andrew	Review update from L. Brzozowski re: confirmation order.	0.1	129.50
07/02/25	Remming, Andrew	Review emails re: certified copy of confirmation order from L. Brzozowski and J. Lawrence.	0.1	129.50
07/02/25	Remming, Andrew	Review draft of amended confirmation order and COC re: same (.3) and emails re: same with L. Brzozowski and E. Schwartz (.1).	0.4	518.00
07/02/25	Remming, Andrew	Tele with E. Schwartz re: update from UST re: confirmation order.	0.1	129.50
07/02/25	Remming, Andrew	Review update from J. Lawrence re: as-entered confirmation order.	0.1	129.50
07/02/25	Remming, Andrew	Review emails from J. Leamy re: confirmation order.	0.1	129.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/02/25	Remming, Andrew	Further emails re: confirmation order revisions with E. Schwartz and JL Miller.	0.1	129.50
07/02/25	Remming, Andrew	Review email from T. Scheuer re: confirmation order.	0.1	129.50
07/02/25	Brzozowski, Luke	Emails with MNAT, Rock Creek and client re: confirmation order.	0.1	62.50
07/02/25	Brzozowski, Luke	Call with E. Schwartz re: WIP and next steps, including amended confirmation order and COC.	0.1	62.50
07/02/25	Brzozowski, Luke	Revise confirmation order (.1); draft CoC re: same (.9); call with E. Schwartz re: same (.1); email to MNAT team re: same (.1); emails to C. Jalbert, J. Leamy, and Sidley re: same (.2); finalize and prepare to file re: same (.3).	1.7	1,062.50
07/02/25	Brzozowski, Luke	Review confirmation order service requirements (.1) and effective date conditions (.3).	0.4	250.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/02/25	Schwartz, Eric D.	Review J. Leamy email regarding appeal and confirmation order (.1), respond to J. Leamy email regarding appeal and confirmation order (.1), email to MNAT team regarding certification of counsel and amended confirmation order (.1), tele. w/ L. Brzozowski regarding certification of counsel and amended confirmation order (.1), review draft certification of counsel and amended confirmation order from L. Brzozowski (.1), tele. with L. Brzozowski regarding comments to certification of counsel (.1), tele. w/ A. Remming regarding same (.1), further tele from L. Brzozowski regarding sign-off of same by UST, K2 and client (.1), review revised certification of counsel and amended confirmation order and email to L. Brzozowski regarding same (.1), review L. Brzozowski, A. Remming, J.L. Miller, C. Jalbert and J. Leamy emails regarding same (.1), review further J. Leamy email to Court regarding same and respond thereto (.1), review emails and filings regarding filing of amended confirmation order and entry of same (.1), review as filed certification of counsel regarding confirmation order (.1).	1.3	1,982.50
07/02/25	Schwartz, Eric D.	Review as entered confirmation order.	0.3	457.50
07/02/25	Schwartz, Eric D.	Review L. Brzozowski, J. Lawrence emails regarding FINRA and certified copy of confirmation order and Certification Request.	0.1	152.50
07/02/25	Schwartz, Eric D.	Review T. Scheuer email regarding FINRA and confirmation order.	0.1	152.50
07/02/25	Schwartz, Eric D.	Tele with A. Remming re: update from UST re: confirmation order.	0.1	152.50
07/03/25	Dolphin, Brenna	Meet with L. Brzozowski to discuss status of amended confirmation order and going effective.	0.1	102.50
07/03/25	Brzozowski, Luke	Draft notice of effective date.	1.3	812.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/03/25	Brzozowski, Luke	Meet with B. Dolphin to discuss status of amended confirmation order and going effective.	0.1	62.50
07/07/25	Dolphin, Brenna	Review and revise draft notice of effective date.	0.4	410.00
07/07/25	Dolphin, Brenna	Meet with L. Brzozowski re: execution of liquidating trust agreement.	0.1	102.50
07/07/25	Dolphin, Brenna	Meet with L. Brzozowski to discuss entry of confirmation order, conditions of effective date, and notice of effective date.	0.2	205.00
07/07/25	Remming, Andrew	Review and edit draft notice of effective date (.4) and review confirmed plan re: same and emails with L. Brzozowski re: same (.1).	0.5	647.50
07/07/25	Remming, Andrew	Review analysis of effective date issues (.1) and emails re: same with L. Brzozowski (.1).	0.2	259.00
07/07/25	Remming, Andrew	Review update from L. Brzozowski re: amended confirmation order.	0.1	129.50
07/07/25	Remming, Andrew	Extensive email exchange with E. Schwartz and L. Brzozowski re: effective date issues.	0.5	647.50
07/07/25	Schwartz, Eric D.	Review as entered amended confirmation order (.3), review L. Brzozowski, J. L. Miller, A. Remming emails regarding same (.1).	0.4	610.00
07/07/25	Schwartz, Eric D.	Review L. Brzozowski email w/ attachment regarding draft notice of effective date with redline (.1), borrowing notice (.1) and letter regarding draw (.1), and review A. Remming email responding thereto and further L. Brzozowski email regarding same (.1), review further L. Brzozowski email w/ attachments regarding revised effective date notice (.1).	0.5	762.50
07/07/25	Schwartz, Eric D.	Review L. Brzozowski, A. Remming emails regarding effective date conditions (.1), review further L. Brzozowski email w/ attachment regarding confirmation materials and going effective conditions (.1), and further A. Remming, L. Brzozowski, J.L. Miller emails regarding going effective (.1).	0.3	457.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/07/25	Schwartz, Eric D.	Review finalized Liquidating Trust Agreement (email from L. Brzozowski).	1.0	1,525.00
07/07/25	Brzozowski, Luke	Review and revise notice of effective date (.3); email B. Dolphin re: same (.1).	0.4	250.00
07/07/25	Brzozowski, Luke	Email to MNAT team re: amended confirmation order.	0.1	62.50
07/07/25	Brzozowski, Luke	Confer with B. Dolphin re: WIP, including effective date notice and confirmation order.	0.2	125.00
07/07/25	Brzozowski, Luke	Review conditions of effective date (.2); draft memo re: same (.2); email to MNAT team re: same (.1); further review Final DIP Order and RSA re: same (.4); email to A. Remming re: same (.1).	1.0	625.00
07/07/25	Brzozowski, Luke	Review and revise liquidating trust agreement (.2); email to MNAT team re: same (.1).	0.3	187.50
07/07/25	Brzozowski, Luke	Emails with C. Jalbert and Rock Creek team re: amended confirmation order and effective date (.3); email to Sidley re: same (.1).	0.4	250.00
07/07/25	Brzozowski, Luke	Meet with B. Dolphin re: execution of liquidating trust agreement.	0.1	62.50
07/08/25	Dolphin, Brenna	Meet with C. Jalbert, M. Schindler, B. Ayers, P. Donnelly, E. Schwartz, A. Remming, and L. Brzozowski re: preconditions to plan going effective.	0.3	307.50
07/08/25	Dolphin, Brenna	Confer with L. Brzozowski re: confirmation order, notice of effective date, and service of same.	0.1	102.50
07/08/25	Schwartz, Eric D.	Tele. w/ A. Remming regarding going effective (.1), tele. w/ C. Jalbert, MJ Schindler, P. Donnelly, B. Ayers, A. Remming, L. Brzozowski and B. Dolphin regarding going effective (.3), review and respond to A. Remming regarding email to JL Miller regarding same (.1), review further A. Remming, L. Brzozowski emails regarding same (.1), further call from A. Remming regarding update of call with JL Miller and going effective (.1).	0.7	1,067.50
07/08/25	Schwartz, Eric D.	Review and respond A. Remming, L. Brzozowski emails regarding draft email to Sidley regarding wind down budget.	0.1	152.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/08/25	Schwartz, Eric D.	Review L. Brzozowski email to C. Jalbert regarding Liquidating Trust Agreement and C. Jalbert email responding thereto.	0.1	152.50
07/08/25	Brzozowski, Luke	Email to Rock Creek, C. Jalbert and MNAT team re: effective date.	0.2	125.00
07/08/25	Brzozowski, Luke	Review confirmation order re: service requirements.	0.1	62.50
07/08/25	Brzozowski, Luke	Attend meeting with Rock Creek, MNAT, and C. Jalbert re: effective date conditions.	0.3	187.50
07/08/25	Brzozowski, Luke	Review DIP Credit Agreement and DIP Final Order (.1); review and revise A. Remming email to Sidley re: same and effective date conditions (.2).	0.3	187.50
07/08/25	Brzozowski, Luke	Emails with C. Jalbert re: Liquidating Trust Agreement (.2); finalize re: same (.1).	0.3	187.50
07/08/25	Brzozowski, Luke	Call with A. Remming re: WIP, including effective date conditions.	0.1	62.50
07/08/25	Remming, Andrew	Office conf with L. Brzozowski re: effective date issues.	0.1	129.50
07/08/25	Remming, Andrew	Tele with E. Schwartz re: effective date issues.	0.1	129.50
07/08/25	Remming, Andrew	Attend call with E. Schwartz, B. Dolphin, L. Brzozowski, Rock Creek and C. Jalbert re: effective date issues.	0.3	388.50
07/08/25	Remming, Andrew	Draft email memo to JL Miller re: effective date issues (.2); review plan re same (.2).	0.4	518.00
07/08/25	Remming, Andrew	Tele with JL Miller re: effective date issues (.1); tele with E. Schwartz re: same (.1); tele with L. Brzozowski re: same (.2); emails with C. Jalbert and Rock Creek team re: same (.2).	0.6	777.00
07/08/25	Remming, Andrew	Review update from L. Brzozowski re: LTA.	0.1	129.50
07/08/25	Remming, Andrew	Review further update re: LTA from C. Jalbert.	0.1	129.50
07/08/25	Remming, Andrew	Draft correspondence to Sidley re: effective date issues (.2); review plan re: same (.1); review and edit revised version of same (.1) and emails re: same with L. Brzozowski and E. Schwartz (.1).	0.5	647.50



<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/08/25	Brzozowski, Luke	Confer with B. Dolphin re: confirmation order, notice of effective date, and service of same.	0.1	62.50
07/08/25	Brzozowski, Luke	Tele with A. Remming re: effective date issues.	0.2	125.00
07/09/25	Schwartz, Eric D.	Review confirmation transcript regarding funding and related matters (.5), tele. w/ L. Brzozowski regarding funding email (.1), review L. Viera email and email to C. Jalbert, MJ Schindler and Rock Creek regarding same (.1), teleconf. w/ A. Remming regarding Viera email and effective date issues (.1), further conf. w/ L. Brzozowski regarding same (.1), confs. w/ A. Remming pre and post call (.2); call with J. Leigh Miller and A. Remming regarding funding, declaration, etc. (.1).	1.2	1,830.00
07/09/25	Schwartz, Eric D.	Teleconf. w/ C. Jalbert, A. Remming and in part J. Gansman regarding funding, wind down budget, etc.	0.4	610.00
07/09/25	Schwartz, Eric D.	Review A. Remming email to JL Miller regarding DIP draw and wind down budget.	0.1	152.50
07/09/25	Remming, Andrew	Tele with E. Schwartz re: effective date issues.	0.2	259.00
07/09/25	Remming, Andrew	Office confs with E. Schwartz re: effective date issues (.2); further tele with E. Schwartz and JL Miller re: same (.1).	0.3	388.50
07/09/25	Remming, Andrew	Tele with JL Miller re: effective date issues.	0.2	259.00
07/09/25	Remming, Andrew	Tele with E. Schwartz, J. Gansman and C. Jalbert re: wind down issues.	0.4	518.00
07/09/25	Remming, Andrew	Review email from L. Brzozowski re: transcript from confirmation hearing.	0.1	129.50
07/09/25	Remming, Andrew	Review emails re: wind down issues from J. Gansman and E. Schwartz.	0.1	129.50
07/09/25	Remming, Andrew	Email to JL Miller re: effective date issues.	0.1	129.50
07/09/25	Brzozowski, Luke	Tele. w/ E. Schwartz regarding funding email (.1), further conf. w/ E. Schwartz regarding Viera email and effective date issues (.1).	0.2	125.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/10/25	Schwartz, Eric D.	Review J. Gansman, C. Jalbert and others' emails regarding funding (.1), conf. w/ L. Brzozowski regarding budget and fees (.1), review L. Brzozowski and others' emails regarding budget and fees (.1), conf. w/ A. Remming and L. Brzozowski regarding same (.2).	0.5	762.50
07/10/25	Schwartz, Eric D.	Call w/ C. Jalbert, J. Gansman, B. Ayers, A. Remming, L. Brzozowski regarding budget, fees, funding, etc.	0.3	457.50
07/10/25	Schwartz, Eric D.	Teleconf. w/ A. Remming regarding budget, funding, fee (.1), review A. Remming, B. Dolphin, L. Brzozowski emails regarding same (.1), review further A. Remming, B. Dolphin, L. Brzozowski emails regarding same (.1), review further A. Remming email to C. Jalbert and Rock Creek regarding updates for the wind down budget (.1), review further emails to professionals from B. Dolphin, L. Brzozowski and related A. Remming, B. Dolphin and L. Brzozowski emails regarding same (.1).	0.5	762.50
07/10/25	Brzozowski, Luke	Confer with E. Schwartz re: professional fees (.1); review emails re: same (.1); conduct professional fee claim analysis (.8); email to MNAT team re: same (.1); further confer with E. Schwartz and A. Remming re: same (.2); emails with A. Remming re: same (.2).	1.5	937.50
07/10/25	Brzozowski, Luke	Call with Rock Creek, C. Jalbert, and MNAT team re: wind down budget and effective date.	0.3	187.50
07/10/25	Remming, Andrew	Office conf with L. Brzozowski and E. Schwartz re: effective date issues.	0.2	259.00
07/10/25	Remming, Andrew	Tele with E. Schwartz, L. Brzozowski, C. Jalbert and Rock Creek team re: effective date issues.	0.3	388.50
07/10/25	Remming, Andrew	Review and analyze wind down budget and POC reconciliation issues and draft summary of analysis (2.1) and extensive email correspondence with MNAT team, C. Jalbert and Rock Creek team re: same (.8).	2.9	3,755.50
07/10/25	Remming, Andrew	Teleconf. w/ E. Schwartz regarding budget, funding, fee.	0.1	129.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/11/25	Remming, Andrew	Draft correspondence to Sidley team re: effective date issues (.4); review revised version of same (.2) and emails re: same with E. Schwartz and L. Brzozowski (.1).	0.7	906.50
07/14/25	Schwartz, Eric D.	Review liquidation trust agreement, plan and confirmation order regarding effective date and thereafter (.3), review current wind down budget (.1).	0.4	610.00
07/14/25	Remming, Andrew	Office conf with L. Brzozowski re: effective date issues.	0.1	129.50
07/14/25	Remming, Andrew	Review email from L. Brzozowski re: winddown/effective date issues.	0.1	129.50
07/14/25	Brzozowski, Luke	Office conf with A. Remming re: effective date issues.	0.1	62.50
07/15/25	Schwartz, Eric D.	Review draft A. Remming email regarding wind down budget (.1), tele. w/ A. Remming regarding wind down budget and discussions (.2), review A. Remming, L. Brzozowski, C. Jalbert emails regarding effective date, DIP draw (.1).	0.4	610.00
07/15/25	Schwartz, Eric D.	Review A. Remming email regarding status of DIP draw draft email.	0.1	152.50
07/15/25	Remming, Andrew	Tele with E. Schwartz re: effective date and budget issues.	0.2	259.00
07/15/25	Remming, Andrew	Email to MNAT team re: effective date issues.	0.1	129.50
07/15/25	Remming, Andrew	Extensive email exchange with C. Jalbert, L. Brzozowski and E. Schwartz re: effective date issues.	0.2	259.00
07/16/25	Schwartz, Eric D.	Review wind down budget (.2), conf. w/ L. Brzozowski regarding status of going effective (.1), conf. w/ A. Remming regarding same (.1), tele. w/ B. Ayers and A. Remming regarding wind down budget (.1).	0.5	762.50
07/16/25	Schwartz, Eric D.	Review L. Brzozowski and others' emails regarding information for wind down budget.	0.1	152.50
07/16/25	Remming, Andrew	Office conf with E. Schwartz re: winddown issues (.1); tele with E. Schwartz and B. Ayers re: same (.1); office conf with L. Brzozowski re: same (.1).	0.3	388.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/16/25	Brzozowski, Luke	Conf. w/ E. Schwartz regarding status of going effective.	0.1	62.50
07/17/25	Schwartz, Eric D.	Tele. from J. Gansman regarding wind down budget (.1), call with A. Remming regarding call with J. Gansman and next steps on wind down budget, going effective and funding request (.1), review K. Hyesoo emails regarding revised budget (.1).	0.3	457.50
07/17/25	Schwartz, Eric D.	Review email from B. Ayers with revised wind down budget (.2), review A. Remming emails regarding same (.1), call with C. Jalbert, J. Gansman, B. Ayers, A. Remming, L. Brzozowski regarding wind down budget, funding request, going effect and agreement with K2 (.2), post-call with L Brzozowski and A. Remming regarding same (.1), review further L. Brzozowski, A. Remming emails regarding wind down budget (.1), review further F. Sadler, L. Brzozowski, A. Remming emails revised budget (.1).	0.8	1,220.00
07/17/25	Schwartz, Eric D.	Review and respond to L. Brzozowski, A. Remming emails regarding draft emails to Sidley and C. Jalbert regarding funding request, wind down budget, going effective conditions (.1), tele. w/ A. Remming and L. Brzozowski regarding same (.2), review further A. Remming, L. Brzozowski, F. Sadler, C. Jalbert emails regarding same (.1), further tele. from A. Remming regarding discussions with Sidley regarding same (.1).	0.5	762.50
07/17/25	Brzozowski, Luke	Call with A. Remming and E. Schwartz re: wind down budget and effective date issues.	0.2	125.00
07/17/25	Brzozowski, Luke	Confer with A. Remming re: borrowing and effective notice and next steps (.1); draft revised borrowing notice (.2).	0.3	187.50
07/17/25	Remming, Andrew	Tele with E. Schwartz and L. Brzozowski re: wind down and effective date issues.	0.2	259.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/17/25	Remming, Andrew	Tele with MNAT, Rock Creek and C. Jalbert re: wind down issues (.2); follow up tele with E. Schwartz and L. Brzozowski re: same (.1).	0.3	388.50
07/17/25	Remming, Andrew	Tele with L. Brzozowski and E. Schwartz re: effective date issues (.2); tele with F. Sadler re: same (.2).	0.4	518.00
07/17/25	Remming, Andrew	Review draft effective date correspondence (.2); emails with L. Brzozowski re: same (.1); office conf with L. Brzozowski re: same and borrowing notice (.1).	0.4	518.00
07/17/25	Remming, Andrew	Draft email memo to C. Jalbert re: effective date issues and wind down budget.	0.2	259.00
07/17/25	Remming, Andrew	Review revised draft of claims analysis (.4); review revisions to same (.1); extensive email exchange re: same with B. Ayers, J. Gansman, E. Schwartz and L. Brzozowski (.4).	0.9	1,165.50
07/17/25	Remming, Andrew	Review emails from F. Sadler and H. Kim re: effective date issues.	0.2	259.00
07/17/25	Remming, Andrew	Review and analyze confirmed chapter 11 plan and confirmation order and effective date conditions, review budget and claim reconciliation analysis and draft and revise memo regarding effective date conditions (2.7); extensive email correspondence with MNAT, Rock Creek and Sidley teams and C. Jalbert re same (.8).	3.5	4,532.50
07/17/25	Remming, Andrew	Review plan and confirmation order (.5); draft further email memo re: effective date issues (.2) and emails re: same with L. Brzozowski (.2).	0.9	1,165.50
07/17/25	Remming, Andrew	Call with E. Schwartz regarding call with J. Gansman and next steps on wind down budget, going effective and funding request.	0.1	129.50
07/17/25	Remming, Andrew	Further tele. from E. Schwartz regarding discussions with Sidley regarding funding request, wind down budget, going effective conditions.	0.1	129.50
07/17/25	Schwartz, Eric D.	Tele with L. Brzozowski and A. Remming re: effective date issues.	0.2	305.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/18/25	Reed, Marie	Review and respond to email from L. Brzozowski re: filing notice (.1); prepare and e-file Notice of (I) Confirmation Order; (II) Effective Date; (III) Applicable Bar Dates for Filing Certain Claims; and (IV) Related Information (.2).	0.3	115.50
07/18/25	Schwartz, Eric D.	Review F. Sadler email regarding funding request and review L. Brzozowski email w/ attachment with funding request (.1), and review and respond to A. Remming, L. Brzozowski, C. Jalbert, emails (.1) regarding funding request and draft email to Sidley regarding conditions to going effective and funding request, email to C. Jalbert regarding same, draft funding request (.1) and further emails from and to A. Remming and L. Brzozowski regarding same and review L. Brzozowski email to C. Sidley with attachment of draw request and F. Sadler's response thereto (.1).	0.4	610.00
07/18/25	Schwartz, Eric D.	Review and respond to L. Brzozowski emails to C. Jalbert, JL Miller regarding going conditions to going effective, and C. Jalbert and JL Miller responses (.1), tele. from L. Brzozowski regarding JL Miller's response and removal motion (.1), review A. Remming email regarding same to JL Miller and F. Sadler email responding thereto and review and respond to L. Brzozowski email regarding same (.1).	0.3	457.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/18/25	Schwartz, Eric D.	Review A. Remming email regarding going effective process/steps and review F. Sadler and A. Remming emails regarding going effective (process) (.1), review L. Brzozowski email to C. Cable regarding funding/draw request and going effective and email to C. Jalbert regarding draft of notice of effective date and C. Jalbert response thereto and further L. Brzozowski, C. Cable, C. Jalbert emails regarding same (.1), review A. Remming email to C. Jalbert regarding going effective and detail of each condition precedent to going effective in effective date condition check list (.2), review A. Remming, L. Brzozowski emails and further L. Brzozowski email to Sidley regarding going effective date notice and F. Sadler response thereto (.1), review A. Remming email to MNAT team regarding effective date condition checklist for Sidley and further F. Sadler, A. Remming, JL Miller emails regarding same (.1), review A. Remming email to Sidley with tracker of effective date conditions and JL Miller email confirming same and A. Remming response thereto (.1).	0.7	1,067.50
07/18/25	Schwartz, Eric D.	Review L. Brzozowski email w/ attachments of finalized liquidating trust agreement (.3), and effective date notice (.1).	0.4	610.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/18/25	Schwartz, Eric D.	Review A. Remming and C. Jalbert emails regarding going effective (.1), review L. Brzozowski email w/ attachment regarding revised effective date notice and A. Remming further emails regarding and commenting on same (.1), review further A. Remming, L. Brzozowski emails regarding effective date notice and review L. Brzozowski email to Sidley regarding revised effective date notice (.1), review H. Kim email w/ attachment of comments to effective date notice and L. Brzozowski, A. Remming emails responding (.1), review and respond to further L. Brzozowski (.1), A. Remming (.1) emails w/ finalized effective date notice, review as filed effective date notice (.1).	0.7	1,067.50
07/18/25	Brzozowski, Luke	Multiple emails with A. Remming re: notice of effective date and conditions re: same.	0.8	500.00
07/18/25	Brzozowski, Luke	Emails with C. Cable (.2) and C. Jalbert (.2) re: notice of effective date and borrowing notice.	0.4	250.00
07/18/25	Brzozowski, Luke	Multiple correspondences with Sidley re: notice of effective date and conditions re: same.	0.3	187.50
07/18/25	Brzozowski, Luke	Finalize liquidating trust agreement (.1) and emails with A. Remming re: same (.1).	0.2	125.00
07/18/25	Brzozowski, Luke	Review and revise notice of effective date per A. Remming and Sidley's comments.	0.6	375.00
07/18/25	Brzozowski, Luke	Finalize and prepare to file and serve notice of effective date.	0.5	312.50



<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/18/25	Remming, Andrew	Review and analyze effective date issues and coordinate with MNAT, Rock Creek, client and Sidley teams re going effective under confirmed chapter 11 plan; including drafting email memos to MNAT, Sidley and client teams re analysis of chapter 11 plan and effective date conditions and update same re satisfaction of effective date conditions; review and edit revised draft of DIP borrowing notice; review and edit draft effective date notice; review revisions to notice of effective date from Sidley team and review chapter 11 plan re same; draft memos to MNAT and client teams analyzing Sidley revisions to effective date notice; extensive email and tele correspondence with MNAT, client and Sidley teams re numerous effective date issues.	4.1	5,309.50
<b>Total</b>			<b>58.5</b>	<b>68,854.50</b>

**Task Code:** B360 Professional Retention (Others - Filing)

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/09/25	Reed, Marie	Review and respond to email from L. Brzozowski re: filing statement (.1); prepare and e-file Verified Statement of Mathys & Squire LLP Pursuant to Federal Rule of Bankruptcy Procedure 2014 (.2).	0.3	115.50
07/09/25	Schwartz, Eric D.	Review C. Pratt, B. Dolphin emails regarding Mathys retention w/ attachment (.1), review Mathys Rule 2014 Statement (.1).	0.2	305.00
07/09/25	Brzozowski, Luke	Review and revise Mathys & Squire's Rule 2014 statement and exhibit (.2); email to B. Dolphin re: same (.1); finalize and prepare to file and serve re: same (.2); email to C. Pratt re: same (.1).	0.6	375.00
07/09/25	Remming, Andrew	Review update from B. Dolphin re: OCP issues.	0.1	129.50
07/09/25	Dolphin, Brenna	Review ordinary course professional retention statement of Mathys & Squire (.1) and confer with L. Brzozowski re same (.1).	0.2	205.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/09/25	Dolphin, Brenna	Review update received from Mathys & Squire (C. Pratt) and respond to same.	0.2	205.00
07/09/25	Brzozowski, Luke	Confer with B. Dolphin re: ordinary course professional retention statement of Mathys & Squire.	0.1	62.50
07/10/25	Brzozowski, Luke	Email to A. Remming re: OCP retentions and professional fees.	0.1	62.50
07/10/25	Brzozowski, Luke	Emails with Rock Creek re: OCP fees (.1); emails to Mathys & Squire and Pope Shamsie & Dooley LLP re: same (.2).	0.3	187.50
07/11/25	Remming, Andrew	Review update from L. Brzozowski re: OCP issues.	0.1	129.50
07/11/25	Remming, Andrew	Further emails re: OCP issues with L. Brzozowski.	0.1	129.50
07/14/25	Remming, Andrew	Emails with L. Brzozowski re: OCP issues.	0.1	129.50
<b>Total</b>			<b>2.4</b>	<b>2,036.00</b>

**Task Code:** B410 General Case Strategy

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/01/25	Schwartz, Eric D.	Review order approving motion for leave and order approving second omnibus rejection motion.	0.1	152.50
07/07/25	Brzozowski, Luke	Revise notice of effective date with B. Dolphin's comments (.1); email same and borrowing notice to MNAT team (.2); further revise notice re: same (.6); email A. Remming re: same (.1).	1.0	625.00
07/11/25	Brzozowski, Luke	Draft email to Rock Creek and C. Jalbert re: final DIP draw, effective date, and update on wind-down budget.	0.4	250.00
07/14/25	Schwartz, Eric D.	Review L. Brzozowski email regarding OCP Fee and Expense Statement & Removal Deadline email (.1); review OCP Fee and Expense Statement (.1).	0.2	305.00
07/14/25	Brzozowski, Luke	Confer with B. Dolphin re: deadline to remove state court actions (.1); research issue re: same (.2); draft email to A. Remming and E. Schwartz re: same and OCP fee and expenses (.2).	0.5	312.50
07/14/25	Dolphin, Brenna	Confer with L. Brzozowski re: deadline to remove state court actions.	0.1	102.50

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/15/25	Brzozowski, Luke	Emails with A. Remming re: wind down budget, borrowing request, and OCP fees.	0.2	125.00
07/16/25	Schwartz, Eric D.	Review L. Brzozowski email w/ attachment regarding OCPs and removal.	0.1	152.50
07/16/25	Brzozowski, Luke	Review and revise WIP memorandum to correspond with recent filings and new dates and deadlines.	0.2	125.00
<b>Total</b>			<b>2.8</b>	<b>2,150.00</b>

**Task Code:** B420 Schedules/SOFA/U.S. Trustee Reports

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/01/25	Remming, Andrew	Email to MNAT team re: unredacted schedules and SOFAs requested by UST.	0.1	129.50
07/01/25	Brzozowski, Luke	Draft amended schedule E/F (.6); email to A. Remming re: same (.1).	0.7	437.50
07/01/25	Schwartz, Eric D.	Review A. Remming, L. Brzozowski, C. Jalbert, et al. emails regarding amending schedules (.1), review L. Brzozowski, A. Remming further emails (w/ attachment) of amended schedules (.1).	0.2	305.00
07/02/25	Reed, Marie	Review and respond to email from L. Brzozowski re: filing schedule (.1); prepare and e-file Amended Schedule E/F of Assets and Liabilities for Molecular Templates OpCo, Inc. (.2).	0.3	115.50
07/02/25	Remming, Andrew	Review amended schedules removing redactions per UST request (.2) and emails re: same with L. Brzozowski (.1).	0.3	388.50
07/02/25	Brzozowski, Luke	Email to C. Jalbert and Rock Creek team re: amended schedule E/F (.1).	0.1	62.50
07/02/25	Brzozowski, Luke	Finalize and prepare to file and serve amended redacted schedule E/F (.3); emails with Verita re: same (.2).	0.5	312.50
07/02/25	Schwartz, Eric D.	Review A. Remming, L. Brzozowski emails (w/ attachments) regarding Amended Schedules and further C. Jalbert, J. Gansman, P. Donnelly emails regarding same.	0.1	152.50
07/02/25	Schwartz, Eric D.	Review as filed amended schedules.	0.2	305.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/07/25	Remming, Andrew	Emails with L. Brzozowski re: amended schedules and SOFAs.	0.1	129.50
07/16/25	Schwartz, Eric D.	Review L. Brzozowski email regarding June MORs.	0.1	152.50
07/16/25	Brzozowski, Luke	Review instructions for UST Form 11-MOR (.2); email to Rock Creek to re: same and June MORs (.1).	0.3	187.50
07/17/25	Schwartz, Eric D.	Review P. Donnelly, C. Jalbert emails w/ attachment regarding draft MORs.	0.1	152.50
07/17/25	Brzozowski, Luke	Review and revise MTEM Inc. and MTEM Opco's monthly operating reports and supporting documents (.4); email to MNAT team re: same (.1).	0.5	312.50
07/17/25	Remming, Andrew	Review draft of June MOR and email re: same from P. Donnelly.	0.3	388.50
07/17/25	Remming, Andrew	Review email from C. Jalbert re: MORs.	0.1	129.50
07/17/25	Remming, Andrew	Review and analyze claims analysis, confirmation order, DIP order and other key documents re: effective date issues and prepare WIP memo re same.	3.5	4,532.50
07/18/25	Schwartz, Eric D.	Review and respond to L. Brzozowski emails regarding June MORs (.1), review further L. Brzozowski emails regarding June MORs (.1).	0.2	305.00
07/18/25	Brzozowski, Luke	Emails with Rock Creek re: June MORs.	0.1	62.50
<b>Total</b>			<b>7.8</b>	<b>8,561.00</b>

**Task Code:** B430 Intellectual Property and Asset Review

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/03/25	Schwartz, Eric D.	Review G. Thomas email regarding Mexican Patent.	0.1	152.50
07/17/25	Schwartz, Eric D.	Review C. Pratt, L. Brzozowski emails regarding Japanese Patent.	0.1	152.50
07/17/25	Brzozowski, Luke	Emails with IP counsel re: Japanese Patent Application.	0.1	62.50
07/17/25	Remming, Andrew	Review update from L. Brzozowski re: IP issues.	0.1	129.50
<b>Total</b>			<b>0.4</b>	<b>497.00</b>

**EXHIBIT B**  
**EXPENSE SUMMARY**

**MOLECULAR TEMPLATES, INC., *et al.***  
**(Case No. 25-10739 (BLS))**

**July 1, 2025 through July 18, 2025**

<b>Expense Category</b>	<b>Total Expenses</b>
Pacer	30.80
In-House Printing - color	92.80
In-House Printing - black & white	3.90
Courier/Delivery Service	121.00
Court Costs	46.00
Transcripts	269.10
<b>Grand Total Expenses</b>	<b>\$563.60</b>

**Cost Detail**

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Amount</u>
07/01/25	Pacer	47.0	4.70
07/01/25	In-House Printing - color	46.0	36.80
07/01/25	In-House Printing - black & white	30.0	3.00
07/01/25	Courier/Delivery Service - COURIER SERVICES FROM MORRIS NICHOLS TO JUDGE BRENDAN L. SHANNON - 07/01/2025	1.0	15.00
07/01/25	Courier/Delivery Service - COURIER SERVICES FROM MORRIS NICHOLS TO BANKRUPTCY COURT - 07/01/2025	1.0	53.00
07/01/25	Courier/Delivery Service - COURIER SERVICES FROM BANKRUPTCY COURT TO MORRIS NICHOLS - 07/07/2025	1.0	53.00
07/01/25	Transcripts - EXPEDITED TRANSCRIPT-ORIGINAL - 46 PAGES - 07/11/2025	1.0	269.10
07/02/25	Pacer	155.0	15.50
07/02/25	Court Costs - COURTS/USDC-DE - RECEIPT A12259937 - FEE FOR DOCUMENT CERTIFICATION - L. BRZOZOWSKI - 07/02/2025	1.0	12.00
07/03/25	Pacer	29.0	2.90
07/07/25	In-House Printing - color	70.0	56.00
07/07/25	Court Costs - FILING FEE CASE #25-10739-BLS - DI 182 - FILED ON 07/02/25	1.0	34.00
07/09/25	Pacer	17.0	1.70
07/16/25	In-House Printing - black & white	9.0	0.90
07/18/25	Pacer	60.0	6.00
<b>Total</b>			<b>\$563.60</b>

**Exhibit C**

**Final Application Summary**

**Cover Sheet of Fee Application (UST Guidelines Exhibit E)**

<b>Final Application Period Summary</b>	
Name of Applicant	Morris, Nichols, Arsht & Tunnell LLP
Name of Client	MOLECULAR TEMPLATES, INC., <i>et al.</i>
Time period covered by Final Application	April 20, 2025 through July 18, 2025
Total compensation sought during Application Period	\$1,047,235.00
Total expenses sought during Application Period	\$9,759.68
Petition Date	April 20, 2025
Retention Date	May 16, 2025, <i>nunc pro tunc</i> to April 20, 2025
Date of order approving employment	May 16, 2025
Total allowed compensation paid to date	\$739,186.40
Total allowed expenses paid to date	\$9,196.08
Total compensation approved by Interim order to date	\$0.00
Total expenses approved by Interim order to date	\$0.00
Blended rate in the Final Application for all partners	\$1,392.15
Blended rate in the Final Application for all attorneys	\$1,005.87
Blended rate in the Final Application for all timekeepers	\$977.63
Compensation sought in the Final Application already paid pursuant to a monthly compensation certificate but not yet allowed by Final order	\$739,186.40



<b>Final Application Period Summary</b>	
Expenses sought in the Final Application already paid pursuant to a monthly compensation certificate but not yet allowed by Final order	\$9,196.08
Number of professionals included in Final Application	22
If applicable, number of professionals in the Final Application not included in staffing plan approved by client	See Exhibit D
If applicable, difference between fees budgeted and compensation sought for the Application Period	N/A
Number of professionals billing fewer than 15 hours to the case during the Application Period	15
Are any rates higher than those approved or disclosed at retention	No.

**Exhibit D****Staffing Plan Final Application Period Staffing Plan**

<b>Category of Timekeeper</b>	<b>Number of Timekeepers Expected to Perform Work Across Matters During the Budget Period</b>	<b>Number of Timekeepers Actually Performing Work During the Budget Period</b>	<b>Projected Average Hourly Rate</b>	<b>Actual Average Hourly Rate</b>
Partner	2	5	\$1,410	\$1,392.15
Senior Counsel	1	1	\$1,075	\$1,075.00
Special Counsel	1	1	\$1,025	\$1,025.00
Associate	2	9	\$740	\$647.12
Other Professionals	4	6	\$435	\$426.28