IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
GRITSTONE BIO, INC.,[1]	Case No. 24-12305 (KBO)
Reorganized Debtor.	**Hearing Date: April 28, 2026 at 10:30 a.m. (ET)** **Objection Deadline: April 13, 2026 at 4:00 p.m. (ET)**

MOTION OF LIQUIDATING TRUSTEE FOR AN ORDER EXTENDING THE DEADLINE TO OBJECT TO THE ALLOWANCE OF CLAIMS

Thomas A. Pitta, in his capacity as Liquidating Trustee (the "Liquidating Trustee") of the Gritstone bio Liquidating Trust (the "Liquidating Trust") established pursuant to *Gritstone bio, Inc.'s Second Modified Chapter 11 Plan of Reorganization* [Docket No. 601-1] (as confirmed, the "Plan"),[2] by and through his undersigned counsel, hereby moves (this "Motion") for entry of an order (the "Proposed Order"), substantially in the form attached hereto as **Exhibit A**, extending the time to object to the allowance of claims (the "Claims Objection Deadline") by approximately 180 days through and including September 28, 2026. In support of this Motion, the Liquidating Trustee respectfully represents as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the "Court") has jurisdiction to consider this Motion under 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated as of February 29, 2012, and Article XII of the Plan. This is a core proceeding under 28 U.S.C. § 157(b).

[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.

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Plan.

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2. Venue of the above-captioned chapter 11 case (this "Chapter 11 Case") and this Motion in this District is proper under 28 U.S.C. §§ 1408 and 1409.

3. The statutory predicates for the relief requested herein are 11 U.S.C. §§ 502 and 503, as supplemented by rule 9006(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and rules 9006-1 and 9006-2 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules").

4. Pursuant to Local Rule 9013-1(f), the Liquidating Trustee confirms his consent to the entry of a final order or judgment by the Court with respect to this Motion if it is determined that the Court, absent consent of the parties, cannot enter a final order or judgment consistent with Article III of the United States Constitution.

RELEVANT BACKGROUND

5. On October 10, 2024 (the "Petition Date"), Gritstone bio, Inc. (the "Debtor" and after the Effective Date, the "Reorganized Debtor") commenced this Chapter 11 Case with the filing of a voluntary petition for relief with the Court.

6. On April 3, 2025, the Court entered the *Order Confirming Gritstone bio, Inc.'s Second Modified Chapter 11 Plan of Reorganization* [Docket No. 601], by which the Plan was confirmed. The Plan became effective on April 4, 2025 (the "Effective Date"). *See* Docket No. 604. On the Effective Date, the Liquidating Trust was created and the Liquidating Trustee was appointed in accordance with the Plan and the Liquidating Trust Agreement.

7. Pursuant to Article VIII.A of the Plan, the Liquidating Trustee was vested with the authority and power to pursue objections to the allowance of all Claims in Class 5 or Class 6 which were pending on the Effective Date, and to file, settle, compromise, or withdraw any objections to Disputed Claims within those same classes.

8. Article I of the Plan sets the Claims Objection Deadline as 180 days after the Effective Date, or October 1, 2025. *See* Plan, Art. I.22.

9. Upon a previous motion of the Liquidating Trustee [Docket No. 730], on October 15, 2025, the Court entered an order extending the Claims Objection Deadline to March 30, 2026. *See* Docket No. 739.

10. Since his appointment, the Liquidating Trustee has been working to finish the reconciliation of the Claims for which he is responsible expeditiously while maximizing recoveries for creditors with valid Claims. The Liquidating Trustee intends to continue investigating and evaluating such Claims in order to file objections to any Claims in Class 5 or Class 6, as may be necessary.

11. Since the Effective Date, the Liquidating Trustee has undertaken various tasks necessary to the administration of the Liquidating Trust. These tasks have included, but are not limited to: (i) investigating and liquidating the Liquidating Trust Assets; (ii) reconciling and resolving Claims (*see* Docket No. 649), including through informal resolutions with claimants; (iii) making distributions to the Liquidating Trust Beneficiaries in accordance with the Liquidating Trust Agreement and the Plan; (iv) fielding and resolving creditor inquires; and (v) otherwise administering the Liquidating Trust.

12. Although the Liquidating Trustee has been working diligently to complete these tasks, and significant progress has been made since the Effective Date, additional work remains. As such, the Liquidating Trustee requires additional time to reconcile and resolve the Claims.

RELIEF REQUESTED

13. By this Motion, the Liquidating Trustee respectfully requests entry of an order, further extending the Claims Objection Deadline for a period of approximately 180 days, from

March 30, 2026, through and including September 28, 2026.[3] The proposed extension is without prejudice to the Liquidating Trustee's right to seek additional extensions of the Claims Objection Deadline, as appropriate.

BASIS FOR RELIEF

14. Sections 502 and 503 of the Bankruptcy Code contemplate that claims will be challenged when appropriate and, if necessary, estimated. *See* 11. U.S.C. §§ 502, 503. The Plan vests the discretion to object to or seek estimation of Claims in Class 5 and Class 6 in the Liquidating Trustee on behalf of the Liquidating Trust. Although the Plan sets an initial deadline by which such challenges must be raised, it contemplates extension of the Claims Objection Deadline by order of this Court. *See* Plan, Art. I.22.

15. Bankruptcy Rule 9006 permits the Court to extend deadlines for cause. Specifically, Bankruptcy Rule 9006 provides, in pertinent part:

> [W]hen these rules, a notice given under these rules, or a court order requires or allows an act to be performed at or within a specified period, . . . the court may—at any time and for cause—extend the time to act if (A) with or without a motion or notice, a request to extend is made before the period (or a previously extended period) expires . . . .

Fed. R. Bankr. P. 9006(b)(1).

16. The Liquidating Trustee submits that the further extension of the Claims Objection Deadline by 180 days is critical to the efficient administration of the Liquidating Trust and is in the best interests of creditors. To ensure the fair and proper administration of the Liquidating Trust, the Liquidating Trustee requests additional time to reconcile and object to any of the remaining Claims within his purview, to the extent such a need arises.

[3] Pursuant to Local Rule 9006-2, the Claims Objection Deadline is automatically extended until the Court acts on this Motion, without the necessity for the entry of a bridge order.

17. The requested extension of the Claims Objection Deadline will not prejudice any claimant or other party in interest and will benefit creditors holding valid Claims in Class 5 and Class 6. Additionally, the requested extension will not affect any claimant's substantive defenses to any objection to its Claim.

18. Given the posture of this Chapter 11 Case and the limited resources available, both the Liquidating Trustee and creditors would be severely prejudiced if the Claims Objection Deadline is not extended. Failure to further extend the Claims Objection Deadline could preclude the Liquidating Trustee from challenging invalid or overstated Claims in Class 5 and Class 6, which will diminish the *pro rata* recovery of other claimants within those Classes under the Plan. Alternatively, without an extension, the Liquidating Trustee may learn of a viable claim objection in the future but would be time-barred if not for the requested extension.

19. Extending the Claims Objection Deadline until September 28, 2026, will permit the Liquidating Trustee to continue finalizing the administration of the Liquidating Trust and allow the Liquidating Trustee to object to any Claims in Class 5 and Class 6, should the need arise, while conserving the limited resources of the Liquidating Trust. Moreover, the Liquidating Trustee believes this extension is appropriate as the Liquidating Trustee's investigation and monetization of certain litigation claims remains ongoing. Failure to further extend the Claims Objection Deadline during the pursuit of such litigation claims could lead to prejudice or waste of resources.

20. In sum, the Liquidating Trustee believes the proposed time extension will provide additional time and flexibility to allow him to continue administering the Liquidating Trust in an efficient manner. The Liquidating Trustee reserves the right to request additional extensions as appropriate. Accordingly, the Liquidating Trustee respectfully submits that cause exists for the relief requested herein.

NOTICE

21. Notice of this Motion has been given to: (i) the Office of the United States Trustee and (ii) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Liquidating Trustee submits that, in light of the nature of the relief requested, no other or further notice need be given.

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CONCLUSION

WHEREFORE, the Liquidating Trustee respectfully requests entry of an order, substantially in the form attached hereto as **Exhibit A**, (i) granting the relief requested herein and (ii) granting such other or further relief as is just and proper.

Dated: March 30, 2026
Wilmington, Delaware

Respectfully submitted,

/s/ Andrew C. Ehrmann

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Counsel to the Liquidating Trustee

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
GRITSTONE BIO, INC.,[1]	Case No. 24-12305 (KBO)
Reorganized Debtor.	**Hearing Date: April 28, 2026 at 10:30 a.m. (ET)** **Objection Deadline: April 13, 2026 at 4:00 p.m. (ET)**

NOTICE OF MOTION OF LIQUIDATING TRUSTEE FOR AN ORDER EXTENDING THE DEADLINE TO OBJECT TO THE ALLOWANCE OF CLAIMS

PLEASE TAKE NOTICE that Thomas A. Pitta, as Liquidating Trustee (the "Liquidating Trustee") of the Gritstone bio Liquidating Trust, filed the *Motion of Liquidating Trustee for an Order Extending the Deadline to Object to the Allowance of Claims* (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that objections to the Motion, if any, must be in writing, filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 N. Market Street, Wilmington, Delaware 19801, on or before **April 13, 2026 at 4:00 p.m. (ET)** (the "Objection Deadline"), and served upon and received by the undersigned counsel.

PLEASE TAKE FURTHER NOTICE that, if any objections to the Motion are received, the Motion and such objections shall be considered at a hearing before the Honorable Karen B. Owens at the Bankruptcy Court, 824 N. Market Street, 6th Floor, Courtroom No. 3, Wilmington, Delaware 19801 on **April 28, 2026 at 10:30 a.m. (ET).**

[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.

IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: March 30, 2026
Wilmington, Delaware

Respectfully submitted,

/s/ Andrew C. Ehrmann

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EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: GRITSTONE BIO, INC.,[1] Reorganized Debtor.	Chapter 11 Case No. 24-12305 (KBO) **Re: Docket No. ___**

ORDER EXTENDING THE DEADLINE
TO OBJECT TO THE ALLOWANCE OF CLAIMS

Upon consideration of the *Motion of Liquidating Trustee for an Order Extending the Deadline to Object to the Allowance of Claims* (the "Motion"),[2] filed by Thomas A. Pitta, in his capacity as Liquidating Trustee pursuant to *Gritstone bio, Inc.'s Second Modified Chapter 11 Plan of Reorganization* [Docket No. 601-1] (as confirmed, the "Plan") in the above-captioned case (the "Chapter 11 Case"); and the Court having reviewed the Motion; and it appearing that proper and adequate notice has been given and that no other or further notice is required; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation thereon; and sufficient cause therefor; it is hereby ORDERED that:

1. The Motion is GRANTED, as set forth herein.

2. Pursuant to Bankruptcy Rule 9006, the Claims Objection Deadline is extended 180 days, through and including September 28, 2026.

[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.

[2] Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

3. This Order shall be without prejudice to the Liquidating Trustee's right to seek further extensions of the Claims Objection Deadline.

4. This Court shall retain jurisdiction with respect to all matters relating to or arising from the Motion or the interpretation or implementation of this Order.