IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
SANGAMO THERAPEUTICS, INC.,[1]	Case No. 26-10989 (CTG)
Debtor.	**Re: Docket No. 375**

MOTION OF THE OFFICIAL COMMITTEE OF EQUITY HOLDERS FOR ENTRY OF AN ORDER SHORTENING THE NOTICE PERIOD WITH RESPECT TO THE EMERGENCY MOTION OF THE OFFICIAL COMMITTEE OF EQUITY HOLDERS TO EXTEND THE BID DEADLINE FOR THE SALE OF THE REMAINING ASSETS

The Official Committee of Equity Holders (the "Equity Committee") appointed in the above-captioned chapter 11 case of Sangamo Therapeutics, Inc. (the "Debtor"), by and through its proposed undersigned counsel, hereby moves (the "Motion"), pursuant to Rule 9006(c) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Rule 9006-1(c) of the Local Rules of Bankruptcy Practice and Procedure for the District of Delaware (the "Local Rules"), and 11 U.S.C. § 105(a), for entry of an order, substantially in the form attached hereto as **Exhibit A**, shortening the notice period with respect to the *Emergency Motion of the Official Committee of Equity Holders to Extend the Bid Deadline for the Sale of the Remaining Assets* (the "Emergency Motion")[2] [Docket No. 375]. In support of this Motion, the Equity Committee respectfully states as follows:

JURISDICTION AND STATUTORY PREDICATES

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*

[1] The last four digits of the Debtor's federal tax identification number are 9556. The Debtor's principal office is located at 501 Canal Boulevard, Suite A100, Richmond, CA 94084.

[2] Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Emergency Motion.

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Order of Reference from the United States District Court for the District of Delaware, dated as of February 29, 2012.

2. This is a core proceeding pursuant to 28 U.S.C. § 157(b), and, under Local Rule 9013-1(f), the Debtor consent to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue of these cases and this Motion in this district is proper under 28 U.S.C. §§ 1408 and 1409. The statutory bases for the relief requested herein are sections 105(a) of the Bankruptcy Code, Bankruptcy Rule 9006(c) and Local Rules 9006-1(c).

BACKGROUND

4. On June 23, 2026 ("Petition Date"), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, commencing this chapter 11 case.

5. The Debtor has continued in the possession of its property and has continued to operate and manage its business as Debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Chapter 11 Case.

6. On August 5, 2026, the United States Trustee for the District of Delaware (the "United States Trustee") filed its *Notice of Appointment of Committee of Equity Holders* [Docket No. 256] of the five (5) member Equity Committee pursuant to section 1102(a)(1) of the Bankruptcy Code.[3] On August 5, 2026, the Equity Committee selected Orrick, Herrington &

[3] The Equity Committee members are the following: (1) Kenneth Grossman; (2) Venkata Jalagam; (3) Frank J. Foley (4) Adam Nagin; and (5) Charlestown Jupiter Fund, LLC. Following his appointment to the Equity Committee, Frank J. Foley resigned, and as of the date hereof, no replacement has been made.

Sutcliffe LLP ("Orrick") as its proposed lead counsel and Morris James as its proposed Delaware counsel.

RELIEF REQUESTED

7. By this Motion, the Equity Committee seeks entry of an order, substantially in the form attached hereto as **Exhibit A**, shortening and limiting notice and objection periods with respect to the Emergency Motion. More specifically, the Equity Committee requests that the Court consider the Emergency Motion at a hearing scheduled before the expiration of the August 31, 2026 Bid Deadline and further requests that the Court set the deadline for the filing of objections to the Emergency Motion, if any, at the hearing.

BASIS FOR RELIEF REQUESTED

8. Local Rule 9006-1(c)(i) states that "all motion papers shall be filed and served . . . at least fourteen (14) days prior to the hearing date." Del. Bankr. L.R. 9006-1(c)(i).

9. Section 102(1) of the Bankruptcy Code explains that the phrase "after notice and a hearing" requires only such notice and opportunity for a hearing as may be appropriate under the circumstances. 11 U.S.C. § 102(1). Additionally, section 105(a) of the Bankruptcy Code provides that the Court "may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions" of the Bankruptcy Code. 11 U.S.C. § 105(a).

10. Under Bankruptcy Rule 9006, the Court may order time periods set by the Bankruptcy Rules to be reduced "for cause shown." Fed. R. Bankr. P. 9006. Local Rule 9006-1(e) likewise provides for shortened notice "by order of the Court, on written motion . . . specifying the exigencies justifying shortened notice." Del. Bankr. L.R. 9006-1(e). In exercising such discretion, the Court should "consider the prejudice to parties entitled to notice and weigh this against the reasons for hearing the motion on an expedited basis." *In re Philadelphia Newspapers, LLC*, 690

F.3d 161, 171-72 (3d Cir. 2012) (noting the commonality of such motions "given the accelerated time frame of bankruptcy proceedings").

11. The Equity Committee, through the filing of this Motion and the contemporaneous filing of the Emergency Motion, is seeking to have the Emergency Motion heard the week of August 24, 2026.

12. As noted above, Local Rule 9006-1(e) provides that the Court, for cause shown, may in its discretion reduce the notice period normally required. The Equity Committee submits that such cause is shown here.

13. As set forth in the Emergency Motion, approval is necessary to provide a reasonable amount of time for interested parties to evaluate potential transactions involving the Remaining Assets.

14. For all the foregoing reasons, the Equity Committee submits that cause exists to shorten the notice for a hearing on the Emergency Motion.

LOCAL RULE 9006-1(e) AVERMENT

15. The undersigned counsel certifies pursuant to Local Rule 9006-1 that a reasonable effort has been made to notify counsel to the Debtor, counsel to the Official Committee of Unsecured Creditors (the "UCC Committee"), and United States Trustee to determine whether there would be an objection to the relief contained in this Motion. Prior to filing of this motion, the Equity Committee reached out to counsel for each of the Debtor, the UCC Committee, and the United States Trustee requesting that each consent on behalf of their respective clients to a hearing on an emergency basis this week. As of the time of filing no party has consented to the relief requested here.

WHEREFORE, the Equity Committee respectfully requests that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, (i) scheduling the Emergency Motion to be heard the week of August 24, 2026, and (ii) setting the deadline for the filing of objections to the Emergency Motion, if any, at the hearing, and (iii) granting any relief that is just and proper.

Dated: August 24, 2026

MORRIS JAMES LLP

/s/ Jason S. Levin

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Proposed Counsel to the Official Committee of Equity Holders

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
SANGAMO THERAPEUTICS, INC.,[1]	Case No. 26-10989 (CTG)
Debtor.	**Re: Docket No. ___**

ORDER SHORTENING THE NOTICE PERIOD WITH RESPECT TO THE EMERGENCY MOTION OF THE COMMITTEE OF EQUITY HOLDERS TO EXTEND THE BID DEADLINE FOR THE SALE OF THE REMAINING ASSETS

Upon consideration of the *Motion of the Committee of Equity Holders for Entry of an Order Shortening the Notice Period With Respect to the Emergency Motion of the Official Committee of Equity Holders to Extend the Bid Deadline for the Sale of the Remaining Assets* (the "Motion"), filed by the Equity Committee,[2] seeking entry of an order shortening time for notice on the Emergency Motion, scheduling the hearing date and time, and establishing the deadline by which parties must file objections to the Emergency Motion; and the Court having determined that granting the relief requested in the Motion is in the best interest of the Debtor, the Debtor's creditors, and other parties in interest; and it appearing that due and adequate notice of the Motion and the Emergency Motion has been given; and no other or further notice of such Motion is necessary or required; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED, that:

1. The Motion is granted to the extent set forth herein.

2. A hearing on the Emergency Motion will be held on _____, 2026 at ___:___ _.m. (prevailing Eastern Time).

[1] The last four digits of the Debtor's federal tax identification number are 9556. The Debtor's principal office is located at 501 Canal Boulevard, Suite A100, Richmond, CA 94084.

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

3. Any party may file an objection to the Emergency Motion at any time until the hearing.

4. The Equity Committee is authorized and empowered to take such actions as may be necessary and appropriate to implement the terms of this Order.

5. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.