Docket #0387 Date Filed: 08/25/2026

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** **Obj. Deadline: September 8, 2026 at 4:00 p.m. (ET)** **Hearing Date: September 21, 2026 at 1:00 p.m. (ET)**

MOTION OF THE OFFICIAL COMMITTEE OF EQUITY HOLDERS TO FILE UNDER SEAL 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 ("Seal Motion") for entry of an order, substantially in the form attached hereto as **Exhibit A** ("Proposed Order"), pursuant to sections 105(a) and 107(b) of title 11 of the United States Code, as amended ("Bankruptcy Code"), Rule 9018 of the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules"), and Rule 9018-1 of the Local Rules for the United States Bankruptcy Court for the District of Delaware ("Local Rules"), authorizing the Equity Committee to file under seal the *Emergency Motion of the Official Committee of Equity Holders to Extend the Bid Deadline for the Sale of the Remaining Assets* (the "Extension Motion")[2] [Docket No. 375]. In support of this Seal Motion, the Equity Committee respectfully states as follows:

[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 meanings ascribed to them in the Extension Motion.

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JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware ("Court") has jurisdiction over this Seal Motion pursuant to 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 February 29, 2012*. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

2. Pursuant to Local Rule 9013-1(f), the Equity Committee consents to the entry of a final order or judgment with respect to this Seal Motion if it is determined that the Court would lack Article III jurisdiction to enter such final order or judgment absent consent of the parties.

3. The statutory predicates for the relief sought herein are sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1.

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 Seal Motion, the Equity Committee seeks entry of the Proposed Order, pursuant to sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1, (i) authorizing the Equity Committee to file the Extension Motion under seal, and (ii) granting such other and further relief as the Court deems just and proper.

BASIS FOR THE RELIEF REQUESTED

8. Section 107(b)(1) provides that "[o]n request of a party in interest, the bankruptcy court shall protect an entity with respect to a trade secret or confidential research, development, or commercial information." 11 U.S.C. § 107(b)(1). Section 105(a) of the Bankruptcy Code further authorizes the Court to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a).

9. Bankruptcy Rule 9018 provides that "[o]n motion or on its own, the court may, with or without notice, issue any order that justice requires to (1) protect the estate or any entity regarding a trade secret or other confidential research, development, or commercial information." Fed. R. Bankr. P. 9018(a)(1). Local Rule 9018-1(d) further provides, in relevant part, that "[a]ny party who seeks to file documents under seal must file a motion to that effect." Del. Bankr. L.R. 9018-1(d).

10. Unlike its counterpart in Rule 26(c) of the Federal Rules of Civil Procedure, an entity seeking protection under section 107(b) of the Bankruptcy Code does not need to demonstrate "good cause" for such relief. *See, e.g.*, *Video Software Dealers Ass'n v. Orion Pictures Corp*. (*In re Orion Pictures Corp*.), 21 F.3d 24, 28 (2d Cir. 1994). Rather, where the

requirements of section 107(b) are satisfied, "the court is required to protect a requesting interested party and has no discretion to deny the application." *See id.* at 27 (emphasis in original). Thus, once the information at issue falls within the scope of section 107(b), the Court has authority to fashion appropriate relief to protect that information from public disclosure.

11. Bankruptcy Rule 9018 likewise gives the Court broad authority to tailor appropriate protection for confidential commercial information. *See In re Global Crossing Ltd*., 295 B.R. 720, 724–25 (Bankr. S.D.N.Y. 2003). Indeed, the "authority goes not just to the protection of confidential documents, but to other confidentiality restrictions that are warranted in the interests of justice." *Id*.

12. The relief requested here satisfies section 107(b), Bankruptcy Rule 9018, and Local Rule 9018-1. The Equity Committee does not seek to withhold information from the Court. Rather, the Equity Committee will provide the Court with an unredacted copy so that the Court may fully evaluate the Extension Motion. The Equity Committee seeks only to restrict public access to references in the Extension Motion, to the extent necessary, to protect the integrity of the Debtor's marketing process for the Remaining Assets.

CERTIFICATION PURSUANT TO LOCAL RULE 9018-1

13. The undersigned counsel certifies that good faith discussions have been held with counsel for the Debtor and counsel to FSI, and agreement has been reached concerning filing the Extension Motion under seal and the redaction of certain references in the publicly filed version of the Extension Motion.

WHEREFORE, the Equity Committee respectfully requests that this Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A**, (i) granting the relief requested in this Seal Motion, and (ii) granting such other and further relief as this Court deems is just and proper.

Dated: August 25, 2026

MORRIS JAMES LLP

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Proposed Counsel to the Official Committee of Equity Holders

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.	**Obj. Deadline: September 8, 2026 at 4:00 p.m. (ET)** **Hearing Date: September 21, 2026 at 1:00 p.m. (ET)**

NOTICE OF MOTION OF THE OFFICIAL COMMITTEE OF EQUITY HOLDERS TO FILE UNDER SEAL THE EMERGENCY MOTION OF THE OFFICIAL COMMITTEE OF EQUITY HOLDERS TO EXTEND THE BID DEADLINE FOR THE SALE OF THE REMAINING ASSETS

PLEASE TAKE NOTICE that on August 25, 2026, the Official Committee of Equity Holders (the "Committee") of Sangamo Therapeutics, Inc., by and through proposed undersigned counsel, filed with the United States Bankruptcy Court for the District of Delaware (the "Court") the *Motion of the Official Committee of Equity Holders to File Under Seal Emergency Motion of the Official Committee of Equity Holders to Extend the Bid Deadline for the Sale of the Remaining Assets* (the "Motion").

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion are required to be filed on or before **September 8, 2026 at 4:00 p.m. (ET)** (the "Objection Deadline") with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, you must also serve a copy of the response upon proposed undersigned counsel to the Committee.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE MOTION WILL BE HELD ON **SEPTEMBER 21, 2026 AT 1:00 P.M. (ET) (the "Hearing")** BEFORE THE HONORABLE CRAIG T. GOLDBLATT, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 3RD FLOOR, COURTROOM NO. 7, WILMINGTON, DELAWARE 19801.

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

[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.

Dated: August 25, 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 GRANTING MOTION OF THE OFFICIAL COMMITTEE OF EQUITY HOLDERS TO FILE UNDER SEAL THE EMERGENCY MOTION OF THE OFFICIAL COMMITTEE OF EQUITY HOLDERS TO EXTEND THE BID DEADLINE FOR THE SALE OF THE REMAINING ASSETS

Upon consideration of the motion ("Seal Motion")[2] of the Official Committee of Equity Holders (the "Equity Committee"), for entry of an order pursuant to sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1 (i) authorizing the Equity Committee to file the Extension Motion under seal, and (ii) granting related relief; and the Court having determined that this is a core matter pursuant to 28 U.S.C. § 157(b)(2); and that the Court can enter a final order consistent with Article III of the United States Constitution; and that venue of the Seal Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and that due and adequate notice has been given, and that no other or further notice need be given; and the Court having determined that granting the relief requested in the Seal 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 Extension Motion has been given; and no other or further notice of such Seal Motion is necessary or required; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED, that:

1. The Seal Motion is **GRANTED** to the extent set forth herein.

[1] The last four digits of the Debtor'ss 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 have the meanings ascribed to them in the Seal Motion.

2. Pursuant to section 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1, the Equity Committee is authorized to file the Extension Motion under seal.

3. The Clerk of the Court is directed to maintain under seal the unredacted Extension Motion. The Clerk of the Court shall not make such sealed materials publicly available. The unredacted Extension Motion shall not be unsealed unless and until permitted by further order of this Court.

4. The Equity Committee is authorized and empowered to take any and all actions necessary to effectuate the relief granted in this Order.

5. The Court retains exclusive jurisdiction over any disputes arising from or relating to this Order, including with respect to the interpretation, implementation, administration, or enforcement of the terms and provisions of this Order.