IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: Apple Tree Life Sciences, Inc., *et al.*,[1] Debtors.	Chapter 11 Case No. 25-12177 (LSS) (Jointly Administered) **Hearing Date: January 20, 2026 at 2:30 p.m. (ET)** **Objection Deadline: At the hearing**
In re: Nereid Therapeutics Incorporated, Debtor. Tax I.D. No. 85-3368493	Chapter 11 Case No. 26-10048 (LSS) (Joint Administration Requested)

DEBTORS' MOTION FOR AN ORDER (I) DIRECTING JOINT ADMINISTRATION OF ADDITIONAL CHAPTER 11 CASE AND (II) EXTENDING CERTAIN RELIEF GRANTED TO THE ORIGINAL DEBTORS

The above-captioned debtors and debtors in possession (collectively, the "Debtors") respectfully submit this supplemental motion (this "Supplement") for entry of an order (the "Proposed Order"), substantially in the form attached hereto as **Exhibit A**, (a) directing the joint administration for procedural purposes only of the additional chapter 11 case (the "Additional Chapter 11 Case") of Nereid Therapeutics Incorporated (the "Additional Debtor") with the jointly administered cases (the "Original Chapter 11 Cases," and with the Additional Chapter 11 Case, the "Chapter 11 Cases") of Apple Tree Life Sciences, Inc., ATP Life Science Ventures, L.P., ATP III GP, Ltd., Apertor Pharmaceuticals, Inc., Initial Therapeutics, Inc., Marlinspike Therapeutics,

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number include: Apple Tree Life Sciences, Inc. (4506); ATP Life Science Ventures, L.P. (8224); ATP III GP, Ltd. (6091); Apertor Pharmaceuticals, Inc. (3161); Initial Therapeutics, Inc. (2453); Marlinspike Therapeutics, Inc. (4757); Red Queen Therapeutics, Inc. (8563); Evercrisp Biosciences, Inc. (4437); and Nine Square Therapeutics, Inc. (4503). The location of the Debtors' service address in these chapter 11 cases is 230 Park Avenue, Suite 2800, New York, NY 10169.

Inc., Red Queen Therapeutics, Inc., Evercrisp Biosciences, Inc., and Nine Square Therapeutics, Inc. (the "Original Debtors"), and (b) applying certain orders entered in the Original Chapter 11 Cases to the Additional Chapter 11 Case to facilitate joint administration of these Chapter 11 Cases. In support of this Supplement, the Debtors submit the *Second Supplemental Declaration of Perry M. Mandarino, Chief Restructuring Officer of the Debtors, in Support of Chapter 11 Petitions and First Day Motions* (the "Second Supplemental Declaration"), filed contemporaneously herewith, rely on and incorporate by reference the Original Orders (defined below) and Original Motions (defined below), as reflected on **Exhibit 1** and **Exhibit 2**[2] attached to the Proposed Order, and respectfully state as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (this "Court") has jurisdiction over this matter pursuant to 28 U.S.C. § 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

2. Pursuant to rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), the Debtors confirm their consent to the Court entering a final order in connection with this Supplement 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 is proper under 28 U.S.C. §§ 1408 and 1409.

[2] The Original Orders and Original Motions shall be referred to herein by the defined terms provided in **Exhibit 1** and **Exhibit 2** to **Exhibit A** hereto, as applicable.

4. The bases for the relief requested herein are section 105(a) of title 11 of the United States Code (the "Bankruptcy Code"), rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Rule 1015-1.

BACKGROUND

5. On December 9 and 15, 2025 and January 1, 2026 (the "Original Petition Dates"), each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. On January 15, 2026 (the "Nereid Petition Date"), the Additional Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Original Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b). *See* Docket No. 69.

6. The Debtors are operating their business and managing their property as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No request for the appointment of a trustee or examiner has been made in these Chapter 11 Cases, and no official committees have been appointed or designated.

7. A detailed description of the facts and circumstances of these Chapter 11 Cases is set forth in the *Declaration of Dr. Seth L. Harrison in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 18] (the "Harrison Declaration") and the *Declaration of Perry M. Mandarino, Chief Restructuring Officer of the Debtors, in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 25] (the "Mandarino Declaration," and with the Harrison Declaration, the "First Day Declarations").[3] As is described in more detail in the First Day Declarations, the Debtors commenced these Chapter 11 Cases due to the failure of Rigmora

[3] Capitalized terms not defined herein shall have the meanings ascribed to such terms in the First Day Declarations, the Second Supplemental Declaration, or the Original Orders and Original Motions, as applicable.

Biotech Investor One LP, and Rigmora Biotech Investor Two LP (collectively, "Rigmora") to fulfill their contractual obligations, and their attempts to wind up Debtor ATP Life Science Ventures, L.P. (the "Partnership Debtor") and liquidate the portfolio companies. Through these Chapter 11 Cases, the Debtors seek to stabilize their business, and, under the Court's supervision, restructure the Partnership Debtor's capital structure.

ADDITIONAL DEBTOR'S CASH MANAGEMENT SYSTEM

I. Overview

8. The Additional Debtor is a part of the Debtors' biotechnology venture capital enterprise operating in the United States. In the ordinary course of business, the Additional Debtor maintains a cash management system (the "Additional Debtor's Cash Management System") comparable to the systems used by similarly situated companies to manage cash in a cost-effective and efficient manner. The Additional Debtor's Cash Management System is critical to the Additional Debtor's business, as it streamlines the Additional Debtor's ability to collect, transfer, and disburse cash and to facilitate cash monitoring, forecasting, and reporting.

9. As of the Nereid Petition Date, the Additional Debtor's Cash Management System is comprised of two (2) bank accounts at Eastern Bank, and one (1) bank account at JP Morgan Chase Bank, N.A. (collectively, the "Additional Debtor's Bank Accounts"). As illustrated on the updated Cash Management System diagram attached as **Exhibit 3** to **Exhibit A** hereto, the Additional Debtor maintains a checking account at Eastern Bank that receives funds from the Partnership Debtor's 6841 Account for operating expenses (the "Additional Cash Management Banks"). The Additional Debtor's Bank Accounts are identified on **Exhibit 4** to **Exhibit A**. The Additional Debtor's accounting department maintains daily oversight over the Additional Debtor's Cash Management System, implements cash management controls for entering, processing, and

releasing funds, and regularly reconciles the Additional Debtor's books and records to ensure that all transfers are accounted for properly.

10. The Additional Debtor's Cash Management System is an essential component of the Debtors' businesses. Any interruption of the Additional Debtor's Cash Management System would severely disrupt the Additional Debtor's operations and result in harm to the Debtors' estates and their stakeholders. Accordingly, the Additional Debtor seeks authority to continue using the Additional Debtor's Cash Management System in the ordinary course of business on a post-petition basis in a manner consistent with past practice, and to pay any pre-petition fees (if any) related to the Additional Debtor's Cash Management System.

II. The Bank Accounts, Flow of Funds, and Bank Fees

11. As noted above, the Additional Debtor's Cash Management System consists of three (3) bank accounts.

12. The Additional Debtor receives funds from the Partnership Debtor at an Eastern Bank account ending in 0065 ("0065 Account"). Funds from the 0065 Account are used to pay the Additional Debtor's expenses.

13. As of the Nereid Petition Date, the Additional Debtor has approximately $17,500.89 of cash on hand.

14. In the ordinary course, the Additional Debtor incurs periodic service charges, payment processing fees, and other fees in connection with maintaining the Additional Debtor's Cash Management System (collectively, the "Supplemental Bank Fees"). The Additional Debtor incurs approximately $179 per month in Supplemental Bank Fees. The Additional Debtor estimates no pre-petition Supplemental Bank Fees remain outstanding as of the Nereid Petition Date. To ensure continued access to the Additional Debtor's Bank Accounts without disruption,

the Additional Debtor seeks authority to pay any such due and owing Supplemental Bank Fees, including, out of an abundance of caution, any pre-petition Supplemental Bank Fees, in the ordinary course on a post-petition basis, consistent with historic practice.

III. Corporate Credit Cards

15. As part of the Additional Debtor's Cash Management System, the Additional Debtor maintains five (5) corporate credit cards to cover legitimate business expenses (collectively, the "Supplemental Corporate Cards"). The Supplemental Corporate Cards have an aggregate credit limit of $35,000.

16. Historically, the Additional Debtor accrued and paid approximately $20,000 per month on account of the Supplemental Corporate Cards. As of the Nereid Petition Date, the Supplemental Corporate Cards hold a balance of approximately $3,000.

17. The costs incurred through use of the Supplemental Corporate Cards are billed directly to the Additional Debtor and do not pass through the applicable employee's personal financial account. The Supplemental Corporate Card payments are paid on a monthly basis.

18. The Supplemental Corporate Cards are an integral part of the Additional Debtor's Cash Management System. The ability of the Additional Debtor to use the Supplemental Corporate Cards on a go-forward basis is essential to the continued operation of the Additional Debtor's business and the corporate administration thereof in order for the relevant employees and vendors to have assurance that they will be able to purchase certain business expenses without having to seek reimbursement from their own account or otherwise seek proper remittance. Accordingly, the Additional Debtor's inability to maintain the Supplemental Corporate Cards would result in unnecessary hardship on the continued operation of the Additional Debtor's business. Out an abundance of caution, the Additional Debtor seeks authorization to continue

honoring obligations in relation to the Supplemental Corporate Cards on a post-petition basis in the ordinary course of business.

IV. Compliance with U.S. Trustee Guidelines and the Bankruptcy Code

19. The Additional Cash Management Banks, except Eastern Bank, are designated as authorized depositories in the District of Delaware by the Office of the United States Trustee (the "U.S. Trustee"), pursuant to the *Operating Guidelines and Reporting Requirements for Debtors in Possession and Trustees* (the "U.S. Trustee Guidelines").

20. In the event that any of the Bank Accounts cease to comply with, or do not comply with, the requirements of section 345(b) of the Bankruptcy Code during the Chapter 11 Cases, the Debtors request that the Court either (a) provide the Debtors with 45 days without prejudice to seek an additional extension from the entry of the Proposed Order, to bring the Bank Accounts into compliance with section 345(b) of the Bankruptcy Code or (b) to seek appropriate relief from the Court.

ADDITIONAL DEBTOR'S EMPLOYEE BENEFITS PROGRAMS

21. On December 15, 2025, the Debtors filed the *Debtors' Motion for Entry of Interim and Final Orders to (I) Continue Employee Benefits Programs and (II) Grant Related Relief* [Docket No. 23] (the "Wages Motion"). On December 19, 2025, the Court entered an interim order [Docket No. 78] (the "Wages Order") approving the relief requested in the Wages Motion on an interim basis. A more detailed description of the Debtors' employee compensation and benefit obligations is provided in the Wages Motion. On January 6, 2026, the Debtors filed the *Debtors' Supplement to Motion for Entry of Interim and Final Orders to (I) Continue Employee Benefits Programs and (II) Grant Related Relief* [Docket No. 124] (the "Wages Supplement") to

extend the relief granted in the Wages Order to Debtors Evercrisp Biosciences, Inc. and Nine Square Therapeutics, Inc.

22. The amount of interim and final relief sought in the Wages Motion and Wages Supplement was calculated based on estimated prepetition amounts owed on account of the Original Debtors' compensation obligations, withholding obligations, payroll processing obligations, and benefits obligations, among others, to their current employees. As of the Wages Supplement, the Original Debtors estimated that approximately $70,000 was owed on account of Employee Benefits and Compensation (as defined in the Wages Motion). The Debtors have since determined it was necessary to file the Additional Debtor for chapter 11 protection. Accordingly, the Debtors now seek to increase the final cap amount to pay prepetition obligations by $9,000 to account for approximately $9,000 in prepetition health insurance premiums that are due and owing on behalf of the Additional Debtor.

RELIEF REQUESTED

23. The Debtors seek entry of the Proposed Order, substantially in the form attached hereto as **Exhibit A**, (a) directing the joint administration for procedural purposes only of the Additional Chapter 11 Case with the Original Chapter 11 Cases, (b) applying the orders listed on **Exhibit 1** to the Proposed Order (the "Original Orders") entered in the Original Chapter 11 Cases to the Additional Chapter 11 Case, and (c) extending the relief requested in the motions filed in the Original Chapter 11 Cases listed on **Exhibit 2** to the Proposed Order (the "Original Motions") to the Additional Chapter 11 Case upon entry of an order granting the relief requested therein.

24. Many of the motions, applications, affidavits, declarations, hearings, and orders that will arise will have equal effect on the Additional Debtor and the Original Debtors. For that reason, the Debtors respectfully submit that their interests, as well as the interests of their creditors

and other parties in interest, would be best served by the joint administration of these Chapter 11 Cases for procedural purposes and by the application of certain orders entered in the Original Chapter 11 Cases to the Chapter 11 Case of the Additional Debtor.

BASIS FOR RELIEF

I. Joint Administration of the Additional Debtor's Chapter 11 Case Is Appropriate and Will Ease Administrative Burdens.

25. Bankruptcy Rule 1015(b) provides, in relevant part, that "[t]he court may order joint administration of the estates in a joint case or in two or more cases pending in the court if they are brought by or against . . . a debtor and an affiliate." Fed. R. Bankr. P. 1015(b). Section 105(a) of the Bankruptcy Code also empowers the Court to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code]." Accordingly, the Bankruptcy Code and Bankruptcy Rules authorize the Court to grant the relief requested herein.

26. In addition, Local Rule 1015-1 provides:

> The Court may order joint administration of related cases pending in this Court without notice and an opportunity for hearing on a motion supported by an affidavit, declaration, or verification establishing that joint administration of the cases is warranted and will ease the administrative burden for the Court and the parties. A joint administration order entered under this Local Rule (i) is procedural only and does not substantively consolidate the debtors' estates and (ii) may be reconsidered on motion of a party in interest at any time.

Del. Bankr. L.R. 1015-1.

27. As described in the First Day Declarations, the Debtors are "affiliates" as defined in section 101(2) of the Bankruptcy Code. Moreover, given the integrated nature of the Debtors' operations, joint administration of the Additional Chapter 11 Case with the Original Chapter 11 Cases will promote the economical and efficient administration of these Chapter 11 Cases by

avoiding the substantial time and expense required in preparing, replicating, filing, and serving duplicate motions, notices, applications, and orders, and will ease the administrative burden for the Court, the Office of the United States Trustee for the District of Delaware, and other parties in interest.

28. Moreover, joint administration will not adversely affect the Debtors' respective constituencies because this Supplement seeks only administrative, not substantive, consolidation of the Debtors' estates. For example, creditors may still file claims against a particular Debtor or its estate (or against multiple Debtors and their respective estates), and the Debtors will maintain separate records of assets and liabilities. Parties in interest will not be harmed by the relief requested; instead, parties in interest will benefit from the cost reductions associated with the joint administration of the Additional Chapter 11 Case with the Original Chapter 11 Cases. Accordingly, the Debtors submit that the joint administration of the Additional Chapter 11 Case with the Original Chapter 11 Cases is in the best interests of their estates, their creditors, and all other parties in interest.

29. The Debtors request that the Clerk of the United States Bankruptcy Court for the District of Delaware (the "Clerk of the Court") maintain one file and one docket for all the jointly administered cases under the case number assigned to Apple Tree Life Sciences, Inc. (Case No. 25-12177 (LSS)), and that the Clerk of the Court administer the Chapter 11 Cases under the following amended consolidated caption:

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Apple Tree Life Sciences, Inc., *et al.*,[1]	Case No. 25-12177 (LSS)
Debtors.	(Jointly Administered)

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number include: Apple Tree Life Sciences, Inc. (4506); ATP Life Science Ventures, L.P. (8224); ATP III GP, Ltd. (6091); Apertor Pharmaceuticals, Inc. (3161); Initial Therapeutics, Inc. (2453); Marlinspike Therapeutics, Inc. (4757); Red Queen Therapeutics, Inc. (8563); Evercrisp Biosciences, Inc. (4437); Nine Square Therapeutics, Inc. (4503); and Nereid Therapeutics Incorporated (8493). The location of the Debtors' service address in these chapter 11 cases is 230 Park Avenue, Suite 2800, New York, NY 10169.

30. The Debtors further request that this Court order that the foregoing caption satisfies the requirements set forth in section 342(c) of the Bankruptcy Code.

31. Additionally, the Debtors request that the Clerk of the Court make a docket entry on the docket of the Additional Debtor to reflect the joint administration of these Chapter 11 Cases, substantially as follows:

> An order has been entered in this case directing the procedural consolidation and joint administration of this chapter 11 case with the chapter 11 cases of *Apple Tree Life Sciences, Inc.*, et al. The docket in Case No. 25-12177 (LSS) should be consulted for all matters affecting this chapter 11 case.

II. Application of the Original Orders and Original Motions to the Additional Chapter 11 Case Will Avoid Unnecessary Duplication and Expense.

32. Section 105(a) of the Bankruptcy Code empowers the Court to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code]." This section expressly affirms that bankruptcy courts are courts of equity and grants the Court the power to fashion orders which serve to preserve or protect the estates' assets. *See Off.*

Comm. of Unsecured Creditors of Cybergenics Corp. v. Chinery, 330 F.3d 548, 568 (3d Cir. 2003) ("[C]ourts are able to craft flexible remedies that, while not expressly authorized by the Code, effect the result the Code was designed to obtain.").

33. This Court's entry of the Proposed Order directing that the Original Orders and Original Motions apply to the Additional Chapter 11 Case will obviate the need for costly and duplicative motions and applications to be filed in the Additional Chapter 11 Case, and such relief is therefore necessary to benefit the Debtors' creditors and parties in interest. This relief will save considerable time and expense for the Debtors and will reduce the burden placed on this Court and parties in interest by avoiding inefficient and duplicative hearings.

34. The Debtors believe this relief is appropriate and necessary to carry out the provisions of the Bankruptcy Code, as required by section 105(a) thereof. Further, such relief is consistent with similar relief previously granted in this district. *See, e.g.*, *In re AIO US, Inc.*, Case No. 24-11836 (CTG) (Bankr. D. Del. Nov. 14, 2024) [Docket No. 389] (order directing joint administration of additional debtors with original debtors and extending applicability of prior orders to additional debtors); *In re Terraform Labs Pte. Ltd.*, Case No. 24-10070 (BLS) (Bankr. D. Del. July 17, 2024) [Docket No. 478] (order extending applicability of prior orders to additional debtors); *In re Amyris, Inc.*, Case No. 23-11131 (TMH) (Bankr. D. Del. Aug. 23, 2023) [Docket No. 125] (order directing joint administration of additional debtors with original debtors and extending applicability of prior orders to additional debtors); *In re Knotel, Inc.*, Case No. 21-10146 (MFW) (Bankr. D. Del. Mar. 26, 2021) [Docket No. 994] (order extending applicability of prior orders to additional debtor).

I. Cash Management Motion

35. Relying on the legal arguments set forth in the Cash Management Motion, the Debtors believe that the Additional Debtor satisfies the standards for maintaining the Additional Debtor's Cash Management System and respectfully requests that the Court allow the Additional Debtor to continue operating the Additional Debtor's Bank Accounts identified on **Exhibit 4** to **Exhibit A** attached hereto. The Additional Debtor's Bank Accounts will be maintained in the ordinary course as they were before the Nereid Petition Date and are necessary to conduct the Additional Debtor's routine pre-petition transactions; as such, the Debtors believe the continued use of the Additional Debtor's Cash Management System falls within the purview of ordinary course transactions permitted under Bankruptcy Code section 363(c)(1). Maintaining the Additional Debtor's Cash Management System and Additional Debtor's Bank Accounts allows efficient utilization of the Additional Debtor's cash resources and will enable the Additional Debtor's business to continue operating. The relief requested in the Cash Management Motion and this Supplement will help minimize any disruption in the Additional Debtor's business operations during these Chapter 11 Cases and preserve the value of the Additional Debtor's estate.

II. Wages Motion

36. As explained in the Wages Motion, failing to honor employee compensation and benefit obligations is very likely to result in premature attrition, demotivation, and lessened productivity of the Debtors' workforce, leading to potentially severe adverse impacts on the Debtors' ability to conduct a successful value-maximizing reorganization. If this Supplement is not approved, the Additional Debtor's employees may suffer significant financial hardship and, as a result, may terminate their employment with the Additional Debtor. Without the continued, uninterrupted services of their current employees, the ability of the Debtors to maximize the value

of their estates and continue their lifesaving research will be materially impaired. As detailed further in the Wages Motion, the relief sought in this Supplement is therefore supported by the "doctrine of necessity." *See, e.g., In re Just for Feet, Inc.*, 242 B.R. 821, 824–25 (D. Del. 1999) (holding that section 105(a) of the Bankruptcy Code provides a statutory basis for the payment of prepetition claims under the doctrine of necessity and noting that "[t]he Supreme Court, the Third Circuit and the District of Delaware all recognize the court's power to authorize payment of pre-petition claims when such payment is necessary for the debtors' survival during chapter 11"); *In re Columbia Gas Sys., Inc.*, 171 B.R. 189, 191–92 (Bankr. D. Del. 1994) (confirming that the doctrine of necessity is the standard in the Third Circuit for enabling a court to authorize the payment of prepetition claims prior to the confirmation of a reorganization plan); *In re Fin. News Network, Inc.*, 134 B.R. 732, 735–36 (Bankr. S.D.N.Y. 1991) ("The 'doctrine of necessity' stands for the principle that a bankruptcy court may allow pre-plan payments of prepetition obligations where such payments are critical to the debtor's reorganization."); *In re Ionosphere Clubs, Inc.*, 98 B.R. 175, 176 (Bankr. S.D.N.Y. 1989).

37. Additional bases for relief are provided at length in the Wages Motion, which is incorporated herein by reference. The Debtors submit that the bases for relief provided in the Wages Motion equally apply to the relief sought in this Supplement. This Supplement merely seeks to update the Debtors' estimate of the amount owed to their employees for prepetition amounts on account of amounts owed by the Additional Debtor.

38. For these reasons, the Debtors respectfully request that the Court approve this Supplement and increase the Employee Obligations Cap (as defined in the Wages Motion) by $9,000.

III. Utilities Motion

39. To the best of the Debtors' knowledge, the Additional Debtor does not utilize traditional Utility Providers. Nevertheless, the Additional Debtor intends to pay postpetition obligations on account of Utility Services (if any) in the ordinary course of business and in a timely manner.

40. Additional bases for relief are provided at length in the Utilities Motion, which is incorporated herein by reference. While the Additional Debtor does not believe that its Utility Services (if any) are provided directly through a Utility Provider, the Additional Debtor seeks to extend the Utility Motion's requested relief to the extent any disputes arise regarding the Additional Debtor's Utility Services. The Debtors submit that the bases for relief provided in the Utilities Motion equally apply to the relief sought in this Supplement. Accordingly, the Debtors assert that extending the relief requested in the Utilities Motion to the Additional Debtor is appropriate and necessary for the efficient administration of these Chapter 11 Cases.

IV. Insurance Motion

41. In the ordinary course of business, the Additional Debtor maintains approximately two (2) insurance policies, which are listed on **Exhibit B** attached hereto (the "Insurance Policies"). The Additional Debtor believes no prepetition amounts are owed on account of the Insurance Policies. As further set forth in the Insurance Motion, continuation and renewal of the Insurance Policies, and entry into new insurance policies as applicable, is essential for preserving the value of the Debtors' business, operations and assets. Additional bases for relief are provided at length in the Insurance Motion, which is incorporated herein by reference. The Debtors submit that the bases for relief provided in the Insurance Motion equally apply to the relief sought in this Supplement.

42. Therefore, the Debtors believe extension of the relief requested in the Insurance Motion to the Additional Debtor is appropriate and necessary for the efficient administration of these Chapter 11 Cases.

V. Interim Compensation Motion

43. The Debtors seek extension of the relief requested in the Interim Compensation Motion to the Additional Chapter 11 Case. As further set forth in the Interim Compensation Motion, extension of the relief requested in the Interim Compensation Motion to the Additional Debtor will ensure an orderly, regular process for the allowance and payment of compensation and reimbursement for professionals retained by the Debtors or any statutory committee appointed in these cases. Additional bases for relief are provided at length in the Interim Compensation Motion, which is incorporated herein by reference. The Debtors submit that the bases for relief provided in the Interim Compensation Motion equally apply to the relief sought in this Supplement.

VI. OCP Motion

44. The Debtors seek extension of the relief requested in the OCP Motion to the Additional Chapter 11 Case. The Debtors do not presently seek to retain additional Ordinary Course Professionals specific to the Additional Debtor.

45. As further set forth in the OCP Motion, extension of the relief requested in the OCP Motion to the Additional Debtor is necessary to avoid disruption of the Debtors' normal business operations as well as the cost, expense, and delay in securing replacement professionals. Additional bases for relief are provided at length in the OCP Motion, which is incorporated herein by reference. The Debtors submit that the bases for relief provided in the OCP Motion equally apply to the relief sought in this Supplement.

46. For these reasons, the Debtors respectfully submit that the relief requested herein is necessary, appropriate, and in the best interests of the Debtors' estates and creditors.

THE REQUIREMENTS OF BANKRUPTCY RULE 6003 ARE SATISFIED

47. Bankruptcy Rule 6003 empowers a court to grant relief within the first 21 days after the Nereid Petition Date if the "relief is needed to avoid immediate and irreparable harm." As set forth in this Supplement, the Additional Debtor believes an immediate and orderly transition into chapter 11 is critical to the viability of their operations and that any delay in granting the relief requested could hinder the Additional Debtor's operations and cause irreparable harm. Furthermore, the failure to receive the requested relief during the first 21 days of the Additional Chapter 11 Case would severely disrupt the Additional Debtor's operations at this critical juncture. Accordingly, the Additional Debtor submits that it has satisfied the "immediate and irreparable harm" standard of Bankruptcy Rule 6003 to support the relief requested herein.

WAIVER OF BANKRUPTCY RULE 6004(A) AND 6004(H)

48. To implement the foregoing successfully, the Debtors request that the Court enter an order providing that notice of the relief requested herein satisfies Bankruptcy Rule 6004(a) and that the Debtors have established cause to exclude such relief from the 14-day stay period under Bankruptcy Rule 6004(h).

NOTICE

49. The Debtors will provide notice of this Supplement to the following parties and/or their respective counsel, as applicable: (a) the United States Trustee for the District of Delaware; (b) the holders of the 30 largest unsecured claims against the Debtors (on a consolidated basis); (c) the United States Attorney's Office for the District of Delaware; (d) the Internal Revenue Service; (e) the attorneys general in the states where the Debtors conduct their business operations;

(f) the Additional Cash Management Banks; (g) the Debtors' Wage and Benefit Service Provider; (h) the Insurance Carriers listed on **Exhibit B** hereto; and (i) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors respectfully submit that, in light of the relief requested, no further notice is necessary.

NO PRIOR REQUEST

50. No prior request for the relief sought in this Supplement has been made to this or any other court.

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CONCLUSION

WHEREFORE, the Debtors respectfully request that this Court enter the Proposed Order, substantially in the form annexed hereto as **Exhibit A**, granting the relief requested herein and such other and further relief as may be just and proper.

Dated: January 16, 2026
Wilmington, Delaware

Respectfully submitted,

/s/ Ethan H. Sulik

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Proposed Counsel to the Debtors and Debtors in Possession

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: Apple Tree Life Sciences, Inc., *et al.*,[1] Debtors.	Chapter 11 Case No. 25-12177 (LSS) (Jointly Administered) **Re: Docket No. __**
In re: Nereid Therapeutics Incorporated, Debtor. Tax I.D. No. 85-3368493	Chapter 11 Case No. 26-10048 (LSS) (Joint Administration Requested)

ORDER (I) DIRECTING JOINT ADMINISTRATION OF ADDITIONAL CHAPTER 11 CASES AND (II) EXTENDING CERTAIN RELIEF GRANTED TO THE ORIGINAL DEBTORS

Upon the supplemental motion (the "Supplement")[2] of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Order"), (a) directing the joint administration for procedural purposes only of the Additional Chapter 11 Case with the Original Chapter 11 Cases, (b) applying the orders listed on **Exhibit 1** to this Order (the "Original Orders") entered in the Original Chapter 11 Cases to the Additional Chapter 11 Case, and (c) extending the relief requested in the motions filed in the Original Chapter 11 Cases listed on **Exhibit 2** to this Order (the "Original Motions") to the Additional Chapter 11 Case upon entry of an order granting the relief requested therein, all as more fully set forth in the Supplement; and

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number include: Apple Tree Life Sciences, Inc. (4506); ATP Life Science Ventures, L.P. (8224); ATP III GP, Ltd. (6091); Apertor Pharmaceuticals, Inc. (3161); Initial Therapeutics, Inc. (2453); Marlinspike Therapeutics, Inc. (4757); Red Queen Therapeutics, Inc. (8563); Evercrisp Biosciences, Inc. (4437); and Nine Square Therapeutics, Inc. (4503). The location of the Debtors' service address in these chapter 11 cases is 230 Park Avenue, Suite 2800, New York, NY 10169.

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

upon the First Day Declarations and the Second Supplemental Declaration; and this Court having jurisdiction over this matter in accordance with 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; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and that the Debtors have consented to entry of a final order; and this Court having found that venue of these Chapter 11 Cases is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that proper and adequate notice of the Supplement and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and objections (if any) to the Supplement having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Supplement and upon the record of the hearing and all of the proceedings had before this Court; and that the legal and factual bases set forth in the Supplement establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT

1. The Supplement is **GRANTED** as set forth herein.

2. The Additional Chapter 11 Case is consolidated with the Original Chapter 11 Cases for procedural purposes only and shall be jointly administered under Case No. 25-12177 (LSS).

3. The caption of the jointly administered cases shall read as follows:

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Apple Tree Life Sciences, Inc., *et al.*,[1]	Case No. 25-12177 (LSS)
Debtors.	(Jointly Administered)

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number include: Apple Tree Life Sciences, Inc. (4506); ATP Life Science Ventures, L.P. (8224); ATP III GP, Ltd. (6091); Apertor Pharmaceuticals, Inc. (3161); Initial Therapeutics, Inc. (2453); Marlinspike Therapeutics, Inc. (4757); Red Queen Therapeutics, Inc. (8563); Evercrisp Biosciences, Inc. (4437); Nine Square Therapeutics, Inc. (4503); and Nereid Therapeutics Incorporated (8493). The location of the Debtors' service address in these chapter 11 cases is 230 Park Avenue, Suite 2800, New York, NY 10169.

4. The foregoing caption satisfies the requirements set forth in section 342(c)(1) of the Bankruptcy Code.

5. The Clerk of the Court shall make a docket entry in the Additional Chapter 11 Case, substantially similar to the following:

> An order has been entered in this case directing the procedural consolidation and joint administration of this chapter 11 case with the chapter 11 cases of *Apple Tree Life Sciences, Inc.*, et al. The docket in Case No. 25-12177 (LSS) should be consulted for all matters affecting this chapter 11 case.

6. The Debtors shall maintain, and the Clerk of the Court shall keep, one consolidated docket, one file, and one consolidated service list for these Chapter 11 Cases, with the assistance of the Debtors' claims and noticing agent.

7. Nothing contained in the Supplement or this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of these Chapter 11 Cases and this

Order shall be without prejudice to the rights of the Debtors to seek entry of an order substantively consolidating these Chapter 11 Cases.

8. The Original Orders, as listed on **Exhibit 1** hereto, are hereby applicable to the Additional Debtor effective as of the Nereid Petition Date, and any orders hereafter entered on motions that were pending in the Original Chapter 11 Cases on or before the date hereof, including the Original Motions listed on **Exhibit 2** hereto, are hereby applicable to the Additional Debtor effective as of the date of entry of such orders, *provided* that any order intentionally limited to specific Debtors shall not apply to the Additional Debtor. The definition of "Debtors" in any of the Original Orders is hereby amended to include the Additional Debtor. Any reference to "Petition Date" in the Original Orders is hereby amended to mean, with respect to the Additional Debtor, the Nereid Petition Date.

Interim Insurance Relief

9. The Additional Debtor is authorized to continue and maintain the Insurance Policies, including, but not limited to, the Insurance Policies identified on Exhibit B to the Supplement, and, in its sole discretion, pay any prepetition or post-petition obligations related to the Insurance Policies, Premium Payments, Deductibles, Brokerage Fees, and any other related expenses.

10. Notwithstanding anything in the Insurance Order granting final relief to the Debtors, the Insurance Order shall be applicable to the Additional Debtor only on an interim basis. The Additional Debtor shall serve notice of entry of this Order on parties in interest, and such parties shall fourteen (14) days therefrom to object to the final relief in the Insurance Order applying to the Additional Debtor on a final basis.

Interim Cash Management Relief

11. The Additional Debtor is authorized to: (a) continue operating the Additional Debtor's Cash Management System, substantially as illustrated on **Exhibit 3** attached hereto; and (b) honor their pre-petition obligations related thereto. The Additional Debtor is further authorized to: (a) continue to use, with the same account numbers, the Additional Debtor's Bank Accounts in existence as of the Petition Date, which accounts are identified on **Exhibit 4** attached hereto; (b) treat the Additional Debtor's Bank Accounts for all purposes as accounts of the Debtors as debtors in possession; (c) deposit funds in and withdraw funds from the Additional Debtor's Bank Accounts by all usual means, including checks, wire transfers, and other debits; (d) pay any pre-petition Supplemental Bank Fees; and (e) pay any ordinary course Supplemental Bank Fees incurred in connection with the Additional Debtor's Bank Accounts, irrespective of whether such fees arose prior to the Nereid Petition Date, and to otherwise perform their obligations under the documents governing the Additional Debtor's Bank Accounts.

12. Notwithstanding anything in the Final Cash Management Order granting final relief to the Debtors, the Final Cash Management Order shall be applicable to the Additional Debtor only on an interim basis. The Additional Debtor shall serve notice of entry of this Order on parties in interest, and such parties shall fourteen (14) days therefrom to object to the final relief in the Final Cash Management Order applying to the Additional Debtor on a final basis.

Interim Wages Relief

13. Notwithstanding anything to the contrary in the Final Wages Order, the Additional Debtor is authorized, but not directed, to pay and honor, prepetition obligations on account of Employee Benefits and Compensation on an interim basis, in the aggregate amount not to exceed $9,000.

14. Notwithstanding anything in the Final Wages Order granting final relief to the Debtors, the Final Wages Order shall be applicable to the Additional Debtor only on an interim basis. The Additional Debtor shall serve notice of entry of this Order on parties in interest, and such parties shall fourteen (14) days therefrom to object to the final relief in the Final Wages Order applying to the Additional Debtor on a final basis.

15. The Debtors and the Clerk of the Court are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

16. This Court shall retain exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

EXHIBIT 1

Original Debtors' Orders

DATE	DOCKET NO.	ORDER
12/17/2025	69	Order Directing Joint Administration of the Debtors' Chapter 11 Cases
12/17/2025	70	Order (I) Authorizing Redaction of Certain Personally Identifiable Information in the Consolidated List of Creditors and Other Filings and (II) Granting Related Relief
12/17/2025	71	Order (I) Approving the Retention and Employment of Kurtzman Carson Consultants, LLC dba Verita Global as the Claims and Noticing Agent to the Debtors and (II) Granting Related Relief
12/19/2025	78	Interim Order Authorizing the Debtors to (I) Continue Employee Benefits Programs and (II) Granting Related Relief (the "Interim Wages Order")
12/19/2025	79	Order Authorizing the Debtors to Open New Segregated Bank Accounts
12/31/2025	107	Interim Order (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System and (B) Honor Certain Pre-Petition Obligations Related Thereto, and (II) Granting Related Relief (the "Interim Cash Management Order")
[●]	[●]	Final Order Authorizing the Debtors to (I) Continue Employee Benefits Programs and (II) Granting Related Relief (the "Final Wages Order," and with the Interim Wages Order, the "Wages Order")
[●]	[●]	Final Order (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System and (B) Honor Certain Pre-Petition Obligations Related Thereto, and (II) Granting Related Relief (the "Final Cash Management Order," and with the Interim Cash Management Order, the "Cash Management Order")
[●]	[●]	Order Authorizing the Debtors to (A) Pay Their Obligations Under Prepetition Insurance Policies, (B) Continue to Pay Certain Brokerage Fees, (C) Renew, Supplement, Modify or Purchase Insurance Coverage, and (II) Granting Related Relief (the "Insurance Order")

[●]	[●]	Order (I) Authorizing Debtors to Employ Professionals Utilized in the Ordinary Course of Business, (II) Waiving Certain Information Requirements of Local Rule 2016-1, and (III) Granting Related Relief
[●]	[●]	Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief
[●]	[●]	Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Executory Contracts and Unexpired Leases, Statements of Financial Affairs, and Rule 2015.3 Reports, and (II) Granting Related Relief
Various	Various	*Pro Hac Vice* Orders

Exhibit 2

Original Debtors' Motions

DATE	DOCKET NO.	MOTION
12/30/2025	106	Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to (A) Pay Their Obligations Under Prepetition Insurance Policies, (B) Continue to Pay Certain Brokerage Fees, (C) Renew, Supplement, Modify, or Purchase Insurance Coverage, and (II) Granting Related Relief (the "Insurance Motion")
1/6/2026	120	Debtors' Motion for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief (the "Interim Compensation Motion")
1/6/2026	121	Debtors' Motion for Entry of an Order (I) Authorizing Debtors to Employ Professionals Utilized in the Ordinary Course of Business, (II) Waiving Certain Information Requirements of Local Rule 2016-1, and (III) Granting Related Relief (the "OCP Motion")
1/6/2026	123	Debtors' Motion Seeking Entry of an Order (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurances Requests, and (IV) Granting Related Relief (the "Utilities Motion")

Exhibit 3

Cash Management Schematic

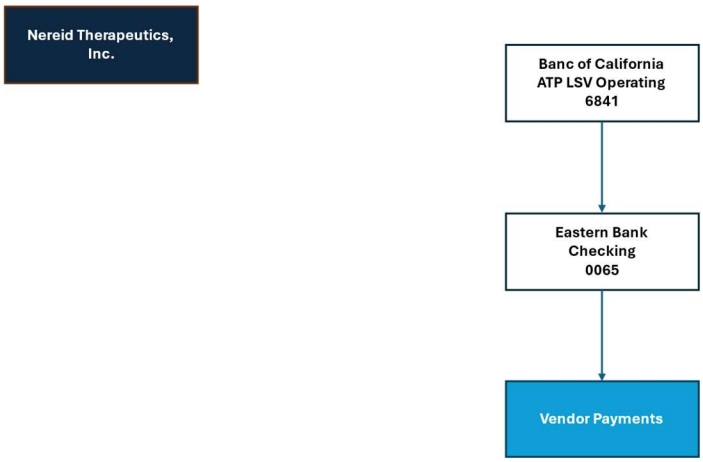


Exhibit 4

Additional Debtor's Bank Accounts

No.	Bank Name	Last Four Digits of Account Number	Account Type
1	Eastern Bank	0065	Checking
2	Eastern Bank	2531	Savings
3	JPM	9626	Checking

Exhibit B

Additional Debtor Insurance Policies

Insurance Carrier	Policy Type	Policy Number	Coverage Period	Premium
Transportation Insurance Company	General Liability	B 7012739969	4/1/2025 – 4/1/2026	$13,016 +$349 (Surcharges)
Continental Casualty Company	Commercial Umbrella	B 7012739972	4/1/2025 – 4/1/2026	$1,232 +$12 (Surcharged)