UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re: CHROME HOLDING CO. (f/k/a 23ANDME HOLDING CO.), *et al.*, Debtors.[1]	Chapter 11 Case No. 25-40976-357 (Jointly Administered)

KRISTEN QUINT'S APPLICATION FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM UNDER 11 U.S.C. § 503

Kristen Quint (the "Applicant") respectfully submits this application (the "Application") for allowance and payment of an administrative expense claim against the above-captioned debtors (collectively, the "Debtors" or "23andMe") pursuant to Section 503(b) of the Bankruptcy Code. In support of this Application, the Applicant states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(B).

2. Venue is appropriate pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

3. On March 23, 2025 (the "Petition Date"), the Debtors commenced the above-captioned bankruptcy proceedings (the "Bankruptcy Cases").

4. On or around that same day, the Applicant executed a Separation Agreement confirming the end of Applicant's employment with certain of the Debtors.

[1] The Debtors in each of these cases, along with the last four digits of each Debtor's federal tax identification number, are: Chrome Holding Co. (0344), ChromeCo, Inc. (7371), Chrome Pharmacy Holdings, Inc. (4690), Lemonaid Community Pharmacy, Inc. (7330), Lemonaid Health, Inc. (6739), Lemonaid Pharmacy Holdings Inc. (6500), LPharm CS LLC (1125), LPharm INS LLC (9800), LPharm RX LLC (7746), LPRXOne LLC (3447), LPRXThree LLC (3852), and LPRXTwo LLC (1595). The Debtors' service address for purposes of these chapter 11 cases is: 870 Market Street, Room 415, San Francisco, CA 94102.

Claim Number: 260636

5. Under the terms of the Separation Agreement, the Debtors became obligated to make a lump sum severance payment of $102,500.00 to the Applicant (the "Severance Amount").

6. Furthermore, as a previous employee of certain of the Debtors, the Applicant possesses rights to advancement, indemnification, reimbursement and/or contribution from the Debtors arising from multiple sources, which may include, but without limitation, the following: applicable state law, bylaws, certificates of incorporation or formation, operating agreements, engagement letters, other organizational documents, board resolutions, indemnification agreements, employment contracts, D&O liability insurance policies, or otherwise (collectively, the "Indemnification Rights").

7. After the Petition Date, the Applicant was and/or remains involved in an investigation commenced by a special committee of independent directors (the "Special Committee Investigation").

8. Furthermore, additional litigation, inquiries, investigations, and other proceedings related to, among other things, 23andMe and its businesses may be commenced in the future against the Applicant (the "Future Proceedings" and, together with the Special Committee Investigation, the "Proceedings").

9. The Proceedings have required, continue to require, and/ or will require the Applicant to retain counsel and incur legal fees, expenses, and other defense costs (the "Indemnification Expenses").

10. The Court established July 14, 2025 as the deadline for filing proofs of claim for pre-petition claims held against the Debtors. *See* ECF No. 349.

11. Accordingly, and out of an abundance of caution, the Applicant timely filed proofs of claim with the Debtors' claims agent asserting the Severance Amount and Indemnification

Expenses. However, through the proofs of claim, the Applicant reserved all rights to seek payment of the Severance Amount and Indemnification Expenses through a timely application for payment of administrative expense claim.

12. On November 26, 2025, the Debtors filed their *Modified Fifth Amended Joint Plan of Chrome Holding Co. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* (the "Plan") [ECF No. 1650].

13. Section V.E of the Plan expressly reinstates the Indemnification Rights and ensures that the Indemnification Rights remain intact, irrevocable, and survive the Effective Date on terms no less favorable than existed prior to the Effective Date. *See* ECF No. 1650 at 69.

14. On December 5, 2025, the Court entered its *Findings of Fact, Conclusions of Law, and Amended Order Confirming the Modified Fifth Amended Joint Plan of Chrome Holding Co. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* (the "Confirmation Order") [ECF No. 1696] confirming the Plan.

15. Paragraph 133(c)(i) of the Confirmation Order expressly preserves the Indemnification Rights. *See* ECF No. 1696 at ¶ 133(c).

16. The deadline for filing requests for administrative expense claims is January 4, 2026. *See* ECF 1709 at 2.

RELIEF REQUESTED

17. Through this Application, the Applicant seeks allowance of the Severance Amount and Indemnification Expenses against the Debtors pursuant to Section 503(b) of the Bankruptcy Code, as well as payment of such Severance Amount and Indemnification Expenses in accordance with the Plan.

18. As described above, the Severance Amount totals $102,500.00.

19. The Indemnification Expenses represent fees and costs already incurred, or anticipated to be incurred, by the Applicant in connection with the Proceedings that are subject to the Indemnification Rights.

20. Because certain of the Proceedings remain ongoing (and additional Indemnification Expenses continue to accrue), the exact amount of the Indemnification Expenses remains unliquidated. The Applicant intends to supplement this Application with additional information regarding the amount of the Indemnification Expenses as such amounts become liquidated.

CONCLUSION

WHEREFORE, the Applicant respectfully requests that the Court enter an order (i) allowing the Severance Amount and Indemnification Expenses as an administrative expense claim against the Debtor, (ii) ordering payment of the Severance Amount and Indemnification Expenses in accordance with the Plan, and (iii) such other and further relief as the Court deems appropriate.

Dated: January 3, 2026

BRYAN CAVE LEIGHTON PAISNER LLP

/s/ Katie Spewak

David M. Unseth, #48086MO
Katie Spewak, #75979MO
One Metropolitan Square
211 N. Broadway, Suite 3600
St. Louis, Missouri 63102-2750
Telephone: (314) 259-2000
Fax: (314) 259-2020
david.unseth@bclplaw.com
katie.spewak@bclplaw.com

Counsel for Kristen Quint