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) **Related D.I.: 926**

MOTION OF ALEXANDER LAWSON AND BARRY LYNCH, IN THEIR CAPACITIES AS CAYMAN APPOINTED OFFICEHOLDERS, FOR AN ORDER SHORTENING NOTICE WITH RESPECT TO THEIR MOTION FOR AN ORDER (I) RECOGNIZING THEIR APPOINTMENT AS OFFICEHOLDERS, (II) CLARIFYING THE SCOPE OF THEIR POWERS AND DUTIES IN THE CHAPTER 11 CASES, AND (III) GRANTING RELATED RELIEF

Alexander Lawson and Barry Lynch, in their capacities as appointed officeholders (the "Officeholders"), by and through their proposed counsel, DLA Piper LLP (US), file this motion (the "Motion") for an order (i) shortening the notice and objection periods with respect to their *Motion of Alexander Lawson and Barry Lynch, in their Capacities as Cayman-Appointed Officeholders, for an Order (I) Recognizing their Appointment as officeholders, (II) Clarifying the Scope of their Powers and Duties in the Chapter 11 Cases, and (III) Granting Related Relief* (the "Motion to Appoint"[2]), filed simultaneously with this Motion, (ii) scheduling an expedited hearing on the Motion as early as the Court's calendar permits, and (iii) granting related relief. In support of this Motion, the Officeholders respectfully state as follows:

[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.

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

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the "Court") has jurisdiction over these chapter 11 cases, the Debtors, property of the Debtors' estates and this matter 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. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(A).

2. Under Local Rule 9013-1(f), the Officeholders consent to the entry of a final order by the Court on 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 is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The statutory bases for the relief requested herein are section 105(a) of the Bankruptcy Code, Bankruptcy Rule 9006, and Local Rule 9006-1.

BACKGROUND

I. General Background

5. On December 9, 2025, December 15, 2025, and January 1, 2026, the above-captioned Debtors commenced these chapter 11 cases. The cases are being jointly administered for procedural purposes only under Case No. 25-12177 (LSS).

6. On January 20, 2026, the Office of the United States Trustee for Region 3 appointed a three-member committee consisting of: (i) Fujifilm Cellular Dynamics Inc.; (ii) Global Project Partners, LLC; and (iii) Baylor College of Medicine (the "Committee").

7. On June 24, 2026, the Court entered the Clarifying Order, which lifted the automatic stay to permit Rigmora to seek a determination in the Cayman Proceeding as to

whether (a) Rigmora had justifiably and irretrievably lost all trust and confidence in the ability of the GP to manage the Fund, and (b) whether the Fund had lost its substratum described above and, if successful, to seek the appointment of officeholders to act in the stead of the GP without entry of a winding up order.

8. Pursuant to this Court's express authorization, the Cayman Court conducted a trial on June 30 and July 1, 2026. On July 10, 2026, the Cayman Court declared that the Fund had lost its substratum and entered the Cayman Order appointing Alexander Lawson and Barry Lynch of Alvarez & Marsal Cayman Islands Limited as joint officeholders with immediate effect to act in the stead of and to the exclusion of ATP III GP, Ltd. as general partner of the Fund.

RELIEF REQUESTED

9. The Officeholders seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), under section 105(a) of title 11 of the United States Code (the "Bankruptcy Code"), rule 9006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and rule 9006-1(e) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules") (i) shortening the notice and objection periods with respect to Motion to Appoint, (ii) scheduling an expedited hearing as soon as the Court's calendar permits, and (iii) granting related relief.

BASIS FOR RELIEF

10. Local Rule 9006-1(c) requires all motion papers to be filed and served at least 14 days prior to the hearing date. Local Rule 9006-1(c)(ii) further provides that objections, if any, to a motion be filed no later than seven days before the hearing date. *See* Del. Bankr. L.R. 9006-1(c)(i), (ii).

11. According to Bankruptcy Rule 9006(c), "[w]hen a rule, notice given under a rule, or court order requires or allows an act to be done within a specified time, the court may—for cause and with or without a motion or notice—reduce the time." Fed. R. Bankr. P. 9006(c)(1). Local Rules 9006-1(e) further provide that a motion may be heard on less notice than as otherwise required if authorized "by order of the Court, on written motion (served on all interested parties) specifying the exigencies justifying shortened notice."

12. Additionally, section 105(a) of the Bankruptcy Code provides that "[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code]."

13. In exercising its discretion, the court should "consider the prejudice to the 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, 172 (3d Cir. 2012) (noting that such motions are common given the "accelerated timeframe of bankruptcy proceedings"). Indeed, "notice and a hearing" is an elastic concept in the Bankruptcy Code meant to consider the "particular circumstances" of a debtor's case. See 11 U.S.C. § 102(1) ("'after notice and a hearing', or a similar phrase . . . means after such notice as is appropriate in the particular circumstances . . ."); *Rockwell Int'l Corp. v. Harnischfeger Indus., Inc. (In re Harnischfeger Indus., Inc.)*, 316 B.R. 616, 620 (D. Del. 2003) ("The policy of Section 102 is to permit the court flexibility, while ensuring that all parties have proper notice.").

14. Here, compelling circumstances exist to shorten the objection and notice periods for this Motion to avoid any uncertainty regarding the appropriate party to represent and manage the GP and Fund debtors in these chapter 11 cases. The Officeholders were appointed with immediate effect in the Cayman Court and should be able to immediately assume their role and

begin administering the Fund's affairs and asserting their rights in these chapter 11 cases. Any delay in confirming the Officeholders' authority could result in conflicting instructions to the CRO, uncertainty as to who is authorized to make decisions for the Fund and the General Partner, and uncertainty as to who may appear in this Court on their behalf.

15. The requested relief will enable the Court to consider this Motion at the earliest practicable opportunity and, if appropriate, confirm the Officeholders' authority so that the Fund's affairs may be properly administered. Moreover, no party will be prejudiced by the requested relief, as the Officeholders are seeking only the limited relief of this Court's recognition of the Cayman Order and clarification of their role in these chapter 11 cases in accordance with this Court's Clarification Order.

LOCAL RULE 9006-1(E) CERTIFICATION

16. In accordance with Local Rule 9006-1(e), counsel to the Officeholders notified the Debtors, the Office of the United States Trustee for Region 3 (the "U.S. Trustee"), the Committee, and Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP of their intention to file this Motion. The Officeholders represent that: (i) the U.S. Trustee takes no position with respect to this Motion; (ii) the Debtors do not object to shortened notice with respect to a hearing on July 22, 2026, but oppose a hearing on a date earlier than July 22, 2026; (iii) the Committee objects to shortened notice; and (iv) Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP support scheduling a hearing on as short notice as possible.

NOTICE

17. Notice of this Motion will be provided to: (i) the Debtors; (ii) the U.S. Trustee; (iii) the Committee; and (iv) all parties entitled to notice under to Local Rules 2002-1(b) and 9013-1(m). The Officeholders submit that no other or further notice is required.

Dated: July 13, 2026
Wilmington, Delaware

Respectfully submitted,

DLA PIPER LLP (US)

/s/ R. Craig Martin

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Proposed Counsel to the Officeholders

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF DELAWARE

In re: Apple Tree Life Sciences, Inc., et al., Debtors.	Chapter 11 Case No. 25-12177 (LSS) (Jointly Administered) **Re: Docket Nos. 926 &**

ORDER SHORTENING NOTICE AND OBJECTION PERIODS WITH RESPECT TO MOTION OF ALEXANDER LAWSON AND BARRY LYNCH, IN THEIR CAPACITIES AS CAYMAN-APPOINTED OFFICEHOLDERS, FOR AN ORDER (I) RECOGNIZING THEIR APPOINTMENT AS OFFICEHOLDERS, (II) CLARIFYING THE SCOPE OF THEIR POWERS AND DUTIES IN THE CHAPTER 11 CASES, AND (III) GRANTING RELATED RELIEF

Upon the motion (the "Motion")[3] filed by the Officeholders for entry of an order (this "Order"), shortening the notice periods and objection deadlines for the Motion to Appoint, setting an expedited hearing for the Motion to Appoint, and related relief, all as more fully set forth in the Motion; and this Court having jurisdiction over the Debtors and their estates 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; and this Court having found that this is a core proceeding under 28 U.S.C. § 157(b)(2)(A); and this Court having found that venue of this proceeding and the Motion in this district is proper under 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Officeholders' notice of the Motion and opportunity for a hearing were adequate and appropriate under the circumstances and no other or further notice need be provided; and this Court having determined that the legal and factual bases set forth in the Motion

[3] Capitalized terms used but not defined herein shall have the meaning given to them in the Motion.

establish just cause for the relief granted in this Order; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion to Shorten is **GRANTED**, as set forth herein.

2. The Motion to Appoint shall be heard on July ___, 2026, at __:00 _.m. (EDT) (the "Hearing").

3. The deadline for any objections to the Motion to Appoint is July __, 2026.

4. The deadline for any responses to objections to the Motion to Appoint is July __, 2026 at 4:00 p.m. (EDT).

5. The Court shall retain exclusive jurisdiction with respect to all matters arising from or related to this Order.