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)

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

Anne Wojcicki (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. As a former director, officer and/or employee of the Debtors, the Applicant possesses certain rights to advancement, indemnification, reimbursement and/or contribution from 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: 260635

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").

5. Before the Petition Date, the Applicant was named as a defendant in two pending class action lawsuits in the Supreme Court of British Columbia: *J.R. & M.M. v. 23andMe Holding Co.*, et al., Case No. VLC-S-S-2465520 (Can. B.C. S.C.) and *J.R. v. 23andMe Holding Co. & 23andMe, Inc.*, Case No. S237147 (Can. B.C. S.C.) (the "Prepetition Proceedings").

6. Furthermore, after the Petition Date, the Applicant was and/or remains involved in a series of legal and related investigations and proceedings, including: (a) an investigation commenced by a special committee of independent directors (the "Special Committee Investigation"); (b) a request for the Applicant's testimony, and the production of documents and other information, from the United States House Oversight Committee (the "Government Investigation"); and (c) an adversary proceeding arising from the Bankruptcy Cases against the Applicant, amongst others, and captioned as *Hector Gutierrez v. Chromeco, Inc. (f/k/a 23andMe, Inc.)*, *et al.*, Case Number 25-04043-357 (the "Adversary Proceeding," and collectively with the Special Committee Investigation and Government Investigation, the "Postpetition Proceedings").

7. 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, which may include, without limitation, alleged claims against the Applicant relating to fiduciary duties and any actions taken in the Applicant's capacity as a director and officer of

23andMe (the "Future Proceedings" and, together with the Prepetition Proceedings and Postpetition Proceedings, the "Proceedings").

8. 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").

9. 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.

10. Accordingly, and out of an abundance of caution, the Applicant timely filed proofs of claim with the Debtors' claims agent asserting the Indemnification Expenses. However, through the proofs of claim, the Applicant reserved all rights to seek payment of the Indemnification Expenses through a timely application for payment of administrative expense claim.

11. 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].

12. 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.

13. 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.

14. Paragraph 133(c)(i) of the Confirmation Order expressly preserves the Indemnification Rights. *See* ECF No. 1696 at ¶ 133(c).[2]

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

RELIEF REQUESTED

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

17. 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.

18. 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.

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[2] Paragraph 133(c)(iii) of the Confirmation Order provides that the rejection of any "Executory Contract" with a "Wojcicki Party" that includes "Indemnification Provisions" requires the filing of a proof of claim for any rejection damages. Accordingly, the Applicant will also be filing a proof of claim for such rejection damages.

CONCLUSION

WHEREFORE, the Applicant respectfully requests that the Court enter an order (i) allowing the Indemnification Expenses as an administrative expense claim against the Debtor, (ii) ordering payment of the 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 Anne Wojcicki