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) **Hearing Date: February 25, 2026 at 10:00 a.m. (ET)** **Objection Deadline: February 18, 2026 at 4:00 p.m. (ET)**

APPLICATION FOR AN ORDER PURSUANT TO 11 U.S.C. §§ 328(a) AND 1103 AUTHORIZING AND APPROVING THE RETENTION AND EMPLOYMENT OF DUNDON ADVISERS LLC AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF JANUARY 23, 2026

The Official Committee of Unsecured Creditors (the "Committee") of Apple Tree Life Sciences, Inc., *et al*. (collectively the "Debtors") in the above-captioned chapter 11 case (the "Chapter 11 Cases") hereby files this application (the "Application") for entry of an order, pursuant to sections 328(a) and 1103 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq*. (the "Bankruptcy Code"), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), authorizing the Committee to retain and employ Dundon Advisers LLC ("Dundon") as financial advisor to the Committee effective as of January 23, 2026. In support of the Application, the Committee submits (i) the declaration of Matthew Dundon attached hereto as **Exhibit A** (the "Dundon Declaration") and (ii) the declaration of Michael B. Dilling of Baylor College of Medicine, not in his individual capacity but solely as

[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.

Chairperson of the Committee, attached hereto as **Exhibit B** (the "Committee Declaration"), and respectfully represents as follows:

JURISDICTION AND VENUE

1. The United States District Court for the District of Delaware has jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the United States Bankruptcy Court for the District of Delaware (the "Court") under 28 U.S.C. § 157 and the *Amended Standing Order of Reference for 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. Pursuant to Local Rule 9013-1(f), the Committee consents to the entry of a final order or judgment by the Court in connection with this Application 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 and other bases for relief requested in this Application are sections 328(a) and 1103 of the Bankruptcy Code, Bankruptcy Rule 2014 and Local Rule 2014-1.

BACKGROUND

A. The Chapter 11 Case

5. On December 9 and 15, 2025 (the "Petition Date"),[2] each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. These Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b). Since the Petition Date, the Debtors have remained in possession of their assets and have continued

[2] Additional Debtor entities filed voluntary petitions on January 1 and 15, 2026.

to operate and manage their business as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

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

7. On January 23, 2026, the Committee selected Cole Schotz P.C. ("Cole Schotz") as its counsel and Dundon as the Committee's financial advisor.

RELIEF REQUESTED

8. By this Application, the Committee respectfully requests that the Court enter an order, pursuant to sections 328(a) and 1103 of the Bankruptcy Code, authorizing the Committee to retain and employ Dundon as its financial advisor to represent the Committee in all phases of the Chapter 11 Case effective as of January 23, 2026, which is the date Dundon was selected as proposed financial advisor and commenced providing services on behalf of the Committee.

9. Contemporaneously herewith, the Committee is filing an application to retain Cole Schotz as its counsel. Dundon and Cole Schotz will coordinate responsibilities and services rendered to the Committee to avoid any unnecessary duplication and inefficiencies.

BASIS FOR RELIEF

10. The Committee requests that the Court approve its retention of Dundon as its financial advisor to perform certain services that will be necessary during the Chapter 11 Case in accordance with Dundon's standard hourly rates and disbursement policies.

[3] Docket No. 194.

11. The Committee selected Dundon as its financial advisor because of the firm's extensive experience representing committees in complex chapter 11 proceedings. Dundon Advisers or its affiliate IslandDundon LLC acts or acted as financial advisor to: Official Committees of Unsecured Creditors of *1 Global* (SD FL), *Acorda Therapeutics* (SDNY), *Agera Energy* (SDNY), *Aequor Management* (ED TX), *Aerofarms* (Delaware), *AFM Mattress* (Delaware), *AfterShock Comics* (CD CA), *Alamo Drafthouse* (Delaware), *All American Oil and Gas* (WD TX), *Allegiance Coal* (Delaware), *Alpha Entertainment* (Delaware), *Alpha Media* (ED VA), *America's Gardening Resource* (Delaware), *American Virtual Cloud Technologies* (Delaware), *Ample* (Southern District of Texas), *AmeriFirst* (Delaware), *AmeriMark* (Delaware), *Aralez Pharmaceuticals* (SDNY), *Automated Trucking* (MD FL), *Avant Gardner* (Delaware), *Aztec Shaeffer* (WD TX), *BeavEx* (Delaware), *Bela Flor* (ND TX), *Better Nutritionals* (CD CA), *Big Village* (Delaware), *Biolase* (Delaware), *BGP / Peltz Shoes* (MD FL), *Catona [CTN]* (Delaware), *Celadon* (Delaware), *Blink Fitness* (Delaware), *Car Toys* (WD WA), *Coach* (Delaware), *Comcar* (Delaware), *Danimer* (Delaware), *DCA Outdoor* (WD MO), *DMK Pharmaceuticals* (Delaware), *Dormify* (Delaware), *Eco-Stim* (SD TX), *Elite Equipment / Reliable Crane* (Montana), *Elite Limousine* (ED NY), *Endo International* (SDNY), *Excell* (ED NY), *FCI Sand* (ND TX), *First Mode* (Delaware), *Flagship Resorts* (New Jersey), *Fluid Market* (Delaware), *Food52* (Delaware), *Franks Theatres* (New Jersey), *Front Sight Management* (Nevada), *F-Start* (SD TX), *Fulcrum Sierra* (Delaware), *Fuse Media* (Delaware), *García Grain Trading* (SD TX), *Global Concessions* (ND GA), *Glostation USA* (CD CA), *Gold's Gym* (ND TX), *Goodrich Quality Theaters* (WD MI), *Ho Wan Kwok* (Connecticut), *Humanigen* (Delaware), *Hwy 55 [Little Mint]* (ED NC), (*HyreCar* (Delaware), *IG Design* (SD TX), *Impresa Aerospace* (Delaware), *In-Shape* (Delaware), *iPic* (Delaware), *iSun* (Delaware), *Ittella (Tattooed Chef)* (CD CA), *Jagged*

Peak/Trade Global (Nevada), *Juno USA* (Delaware), *K&W Cafeterias* (MD NC), *KidKraft* (ND TX), *Lannett* (Delaware), *LaSalle Group* (ND TX), *LBI Media* (Delaware), *Loot Crate* (Delaware), *Lifesize* (SD TX), *Lucira Health* (Delaware), *Madison Square Boys & Girls Clubs* (SDNY), *Maines Paper & Food* (Delaware), *Mallinckrodt* (Delaware), *Matheson* (ED CA), *McClatchy* (SDNY), *MediaMath* (Delaware), *Meridian Restaurants* (Utah), *Miles Keller Trucking* (CD IL), *Mitchell Gold* (Delaware), *NewAge* (Delaware), *NG Purvis Farms* (ED VA), *Nogin* (Delaware), *Nova Shurline Wildcat* (Delaware), *Novan* (Delaware), *Omega Therapeutics* (Delaware), *Omnicare* (ND TX), *One Table* (Delaware), *Open Road Films* (Delaware), *OYA Renewables* (Delaware), *Packable* (Delaware), *Pear Therapeutics* (Delaware), *Peer Street* (Delaware), *Pipeline Foods* (Delaware), *Planta [CHG US Holdings]* (Delaware), *Off Lease Only* (Delaware), *Out of the Gate* (Delaware), *Plastiq* (Delaware), *Platinum Corral* (ED NC), *Port Elizabeth* (New Jersey), *Professional Technical Security Services* (ND CA), *Proteus Heath* (Delaware), *Quanergy* (NJ), *Remnant Oil Company* (WD Texas), *Rive Gauche Television* (CD CA), *Rocking M Media* (Kansas), *Roman Catholic Diocese of Albany* (ND NY), *Rue 21* [2024] (Delaware), *SIW Holdings* (Delaware), *Slidebelts* (ED CA), *South American Beef* (SD IA), *Structurlam* (Delaware), *Studio Movie Grill* (ND TX), *Sunergy* (ED CA), *Sungard Availability Services* (SD TX), *Supply Source* (Delaware), *Takeoff Technologies* (Delaware), *Tehum Care Services, Inc.* (SD TX), *TOMS King* (ND OH), *TPC Group* (Delaware), *Trinitas Farming* (ND CA), *UpHealth* (Delaware), *Valmiera Glass* (ND GA), *Vector Launch* (Delaware), *Video Corporation of America* (New Jersey), *Village Roadshow* (Delaware) *Volunteer Energy* (SD OH), *Wave Technologies* (ND CA), *Wellmade* (ND GA), *Wellpath* (SD TX), *Westlake Surgical* (WD TX), *Whittier Seafood* (Alaska), *Williams Industrial* (Delaware), *YogaWorks* (ND TX), *YouFit* (Delaware), *Zigi* (SDNY), and *Zynex* (SD TX), and the Ad Hoc Group of Equity Security Holders in *Clearside* (Delaware), the Ad Hoc

Group of Unsecured Noteholders of Crown Capital Holdings (out of court, prior to the commencement of the issuers' Chapter 11 proceedings, in which IslandDundon LLC acts as debtor financial adviser), the Official Committee of Equity Interest Holders in *Eiger Biopharmaceuticals* (ND TX), the Ad Hoc Group of Consumer and Worker Litigation Claims in *Rite Aid* (SDNY), the Ad Hoc Group of Consumer and Worker Litigation Claimants in *Hertz* (Delaware), the Committee of Customers in *Lear Capital* (Delaware), the Official Committee of Tort Claimants in *PG&E* (ND CA), the Ad Hoc Group of Individual Victims in *Purdue* (SDNY), the Ad Hoc Group of Second Lien Bondholders in *CalPlant* (Delaware), the Ad Hoc Group of Healthcare Providers in *American Physician Partners* (Delaware), the Official Committee of Unsecured Commercial Creditors of the *Roman Catholic Archdiocese of New Orleans* (ED LA), the Ad Hoc Group of Equity Security Holders in *RAIT* (Delaware), Ad Hoc Noteholder Group in *WOM* (Delaware), the Ad Hoc Noteholder Group in *Woodbridge Group of Companies* (Delaware), and the Ad Hoc Group of Equity Interest Holders in *Voyager* (SDNY). All of the foregoing are highly complex chapter 11 cases.

12. The Committee seeks to retain Dundon because Dundon is well qualified to represent, advise and assist the Committee in performing its duties in the Chapter 11 Case.

SERVICES TO BE PROVIDED BY DUNDON

13. **Consulting Services.** The Committee respectfully submits that it is necessary and appropriate to employ and retain Dundon as its financial advisor perform certain consulting services to represent it in the Chapter 11 Cases and render various professional services to enable it to faithfully execute its duties. Dundon's consulting services (the "Consulting Services") may include, but are not limited to, and in each case excluding any services fairly classified under the Transaction Services set forth in the next paragraph:

a. Serving as financial advisor to the Committee;

b. Assisting in the analysis, review, and monitoring of the restructuring process, including, but not limited to, an assessment of potential recoveries for unsecured creditors;

c. Developing a complete understanding of Debtors' business, including their debtor and non-debtor portfolio companies, intellectual property and their valuations;

d. Determining whether there are viable alternative paths for the disposition of the Debtors' assets from those currently or in the future proposed by any Debtors;

e. Advising the Committee on the marketing process of the Debtors' assets to any company or on a potential plan of reorganization.

f. Assisting in valuing any bids or term sheets received for the Debtors' assets;

g. Evaluating term sheets received related to potential DIP financing, litigation funding/financing, and/or exit financing.

h. Assisting the Committee in identifying, valuing, and pursuing estate causes of action, including, but not limited to, relating to prepetition transactions, control person liability, and lender liability;

i. Assisting the Committee to analyze, classify and address claims against the Debtors and to estimate (in any formal or informal sense) the different claims pools, including the analysis of contingent, unliquidated, and disputed claims;

j. Assisting the Committee to identify, preserve, value, and monetize tax assets of the Debtors, if any;

k. Advising the Committee in negotiations with the Debtors, lenders of the Debtors' portfolio companies, and third parties;

l. Analyzing and reviewing the Debtors' financial reports, including monthly operating reports and the filed statement of financial affairs and schedule of assets and liabilities;

m. Assisting the Committee in reviewing the Debtors' cost/benefit analysis with respect to the assumption or rejection of various executory contracts and leases (if necessary);

n. Reviewing and providing analysis of operating budgets, actual-budget variances, and liquidity;

o. Assisting the Committee in evaluating and analyzing avoidance actions, including fraudulent conveyances and preferential transfers;

p. Reviewing and providing analysis of any proposed disclosure statement and chapter 11 plan and, if appropriate, assist the Committee in developing an alternative chapter 11 plan;

q. Attending meetings and assisting in discussions with the Committee, the Debtor, the secured lender, the U.S. Trustee and other parties in interest and professionals;

r. Presenting at meetings of the Committee, as well as meetings with other key stakeholders and parties;

s. Providing testimony on behalf of the Committee as and when may be deemed appropriate; and

t. Performing other advisory services for the Committee as may be necessary or proper in these proceedings.

14. **Transaction Services.** In addition to the Consulting Services outlined above, the Committee requests the retention and employment of Dundon to (i) introduce to the Debtors lenders not contacted by the Debtors' restructuring advisor, B. Riley Restructuring Services LLC ("B. Riley"), as potential providers of debtor-in-possession financing ("DIP Financing"), and assist in negotiating terms of any contemplated DIP financing with such lenders, and (ii) introduce to the Debtors, or to the Debtors and the Committee if and after the Debtors' Chapter 11 Plan exclusivity expires or is terminated by the Court, parties who may provide exit financing and/or purchase all or part of the Debtors' assets the proceeds of which will provide for stakeholder recovery ("Exit Transaction") (collectively, the "Transaction Services").

15. The Committee respectfully represents that it is necessary for the Committee to retain a financial advisor to perform the above-referenced Consulting Services and Transaction Services and otherwise assist the Committee in fulfilling its statutory duties under the Bankruptcy Code. Dundon will perform the above tasks, as may be requested by the Committee, in a manner

that avoids unnecessary duplication, promotes the efficient representation of the Committee and is consistent with the representation of the Committee as financial advisor.

DISINTERESTEDNESS OF DUNDON

16. To the best of the Committee's knowledge, information and belief and as evidenced by the Dundon Declaration, Dundon nor any of its affiliates do not currently hold or represent any interest adverse to the interest of the estate or creditors or equity security holders with respect to the matters in which Dundon is to be employed, except as set forth therein, and Dundon is "disinterested" under section 101(14) of the Bankruptcy Code.

17. Except as disclosed in the Dundon Declaration, neither Dundon nor any of its affiliates have any connections with any entities other than the Committee, in matters related to the Chapter 11 Case. Dundon may have a connection or may have had a connection with certain parties with interests in the Chapter 11 Cases on matters unrelated to the Chapter 11 Cases. As set forth in the Dundon Declaration, Dundon has conducted, and continues to conduct, research into its relations with the Debtors, the Debtors' substantial creditors and other parties in interest in the Chapter 11 Cases.

18. In the event that Dundon learns of additional connections not reflected in the Dundon Declaration, Dundon will use reasonable efforts to promptly file a supplemental declaration.

COMPENSATION OF DUNDON

19. **Consulting Services.** The terms of the employment of Dundon provide generally that professionals within Dundon will undertake this representation at their standard hourly rates for all Consulting Services, and that Dundon will be reimbursed for reasonable and necessary expenses, subject to the approval of the Court in accordance with sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and the orders of this Court.

20. The present hourly rates for professionals of Dundon are set forth in the Dundon Declaration. The hourly rates are subject to periodic adjustments to reflect economic and other conditions and to reflect increases in professional expertise and experience. Dundon will advise the Committee, the Debtors and the U.S. Trustee of any increases in its hourly rates.[4]

21. Dundon will also seek reimbursement for reasonable and necessary expenses incurred, which may include travel expenses, work-related meals, and other out-of-pocket expenses incurred in providing professional services to the Committee. Dundon will charge for these out-of-pocket expenses at cost to Dundon and in accordance with the Bankruptcy Rules and the Local Rules. Non-working travel time will be billed at 50% of a professional's standard hourly rate.

22. **Transaction Services.** In addition to the hourly fees set forth above in connection with the Consulting Services, Dundon will earn the following contingent fees as follows in connection with the Transaction Services:

a. DIP Financing Fee. Upon the consummation of each DIP Financing (the "DIP Financing Transaction") from a party who, or whose affiliates or predecessor, Dundon so introduced, Dundon shall earn, and the Debtors shall pay immediately and directly from the gross proceeds of such DIP financing, as a cost of such DIP financing, a cash fee equal to one percent (1%) of the gross proceeds of any such DIP Financing placed with a counterparty first introduced by Dundon ("DIP Financing Fee").

b. Exit Transaction Fee. Separate from and addition to any DIP Financing Fee, upon the consummation of each Exit Transaction (as defined above), Dundon shall earn, and the Debtors shall pay immediately and directly, a transaction fee ("Exit Transaction Fee" and, with the DIP Financing Fee, the "Transaction Fees") upon the closing of such a transaction with a party who, or whose affiliate or predecessor, Dundon so introduced, (an "Exit Transaction") of (i) two percent (2.0%) of the gross proceeds of any senior secured indebtedness raised or committed excluding debtor-in-possession financing, (ii) 2.5% of gross proceeds of any indebtedness raised or committed that is secured by a lien (other than first lien), is unsecured and/or is subordinated, (iii) 5.0% of the gross proceeds of all equity or equity linked securities placed or committed, (iv) 5.0%

[4] Such rate increases generally occur on or about July 1 of each year.

of the gross proceeds of any litigation funding raised or committed, and (v) 5.05% of the gross proceeds of the purchase of any assets.

23. For the avoidance of doubt, any time spent by Dundon on Transaction Services that could earn Dundon a Transaction Fee (DIP Financing Fee or Exit Transaction Fee) will not be subject to Dundon's hourly rates set forth above. In addition, Dundon is not seeking approval of any DIP Financing Fee or Exit Transaction Fee as part this Application. However, Dundon will seek approval of such fees at a later time.

24. The Transaction Fee structure is consistent with and typical of compensation arrangements entered into by other comparable firms in connection with the rendering of similar services under similar circumstances. Dundon's potential DIP Financing Fee is equal to the DIP financing fee which may potentially be charged by B. Riley, the Debtors' proposed restructuring advisor. *See* Docket No. 131. Both of Dundon's potential DIP Financing Fee and Exit Transaction Fee are reasonably and market-based to fairly compensate Dundon for its work. The Committee believes that the fee structure is in fact reasonable, market-based, and designed to fairly compensate Dundon for its work and to cover necessary and reasonable expenses.

NOTICE

25. Notice of this Application will be provided to the following parties: (i) the U.S. Trustee; (ii) counsel to the Debtors; and (iii) those persons who have formally appeared in this Chapter 11 Cases and requested service pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Committee respectfully submits that no other or further notice of the Application is required.

NO PRIOR REQUEST

26. No prior request for the relief requested in this Application has been made to this Court or any other court.

CONCLUSION

WHEREFORE, the Committee respectfully requests that this Court enter an order, substantially in the form attached hereto as **Exhibit C**, authorizing and approving the Committee's retention and employment of Dundon as its financial advisor effective as of January 23, 2026, and grant such other and further relief as the Court deems just and proper.

Dated: February 4, 2026

THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF APPLE TREE LIFE SCIENCES, INC., ET AL.

/s/ Michael B. Dilling
By: Michael B. Dilling
On behalf of Baylor College of Medicine, Solely in his capacity as Chairperson of the Official Committee of Unsecured Creditors of Apple Tree Life Sciences, Inc., *et al.*

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) **Hearing Date: February 25, 2026 at 10:00 a.m. (ET)** **Objection Deadline: February 18, 2026 at 4:00 p.m. (ET)**

NOTICE OF APPLICATION FOR AN ORDER PURSUANT TO 11 U.S.C. §§ 328(a) AND 1103 AUTHORIZING AND APPROVING THE RETENTION AND EMPLOYMENT OF DUNDON ADVISERS LLC AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF JANUARY 23, 2026

PLEASE TAKE NOTICE that, on February 4, 2026, the Official Committee of Unsecured Creditors (the "Committee") of the above-captioned debtors and debtors-in-possession (the "Debtors"), by and through its undersigned proposed counsel, filed with the United States Bankruptcy Court for the District of Delaware (the "Court") the *Application for an Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 Authorizing and Approving the Retention and Employment of Dundon Advisers LLC as Financial Adviser to the Official Committee of Unsecured Creditors Effective as of January 23, 2026* (the "Application").

PLEASE TAKE FURTHER NOTICE that a hearing to consider the relief sought in the Application will be held on **February 25, 2026 at 10:00 a.m. (ET)** before Honorable Laurie S. Silverstein at the Bankruptcy Court, 824 N. Market Street, 6th Floor, Courtroom No. 2, Wilmington, Delaware 19801.

[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.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the entry of an order granting the relief sought in the Application must be filed on or before **February 18, 2026 at 4:00 p.m. (ET)** (the "Objection Deadline") with the Court, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, you must serve a copy of the response or objection upon the undersigned proposed counsel to the Committee so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO PROPERLY FILE AND SERVE A RESPONSE ON OR BEFORE THE OBJECTION DEADLINE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

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Dated: February 4, 2026
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Justin R. Alberto

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Proposed Counsel to the Official Committee of Unsecured Creditors

EXHIBIT A

Dundon Declaration

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)

DECLARATION OF MATTHEW J. DUNDON IN SUPPORT OF APPLICATION FOR AN ORDER PURSUANT TO 11 U.S.C. §§ 328(a) AND 1103 AUTHORIZING AND APPROVING THE RETENTION AND EMPLOYMENT OF DUNDON ADVISERS LLC AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF JANUARY 23, 2026

Matthew J. Dundon hereby declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a principal of the financial advisory firm Dundon Advisers LLC ("Dundon"), which maintains its main office at 10 Bank Street, Suite 1100, White Plains, NY 10606.

2. This Declaration is submitted pursuant to sections 328(a) and 1103(b) of the Bankruptcy Code, Bankruptcy Rule 2014 and Local Rule 2014-1 and in support of the *Application of the Official Committee of Unsecured Creditors for an Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 Authorizing and Approving the Retention and Employment of Dundon Advisers LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of January 23, 2026* (the "Application").[2]

[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 and not otherwise defined herein shall have the meanings ascribed to them in the Application.

3. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein. To the extent that any information disclosed herein requires supplementation, amendment or modification upon Dundon's completion of further analysis or as additional information becomes available to it, a supplemental declaration will be filed with the Court.

Dundon's Disinterestedness

4. In connection with its proposed retention by the Committee in the Chapter 11 Cases, Dundon researched its client database to determine whether it or its affiliates have relationships with any of the entities or persons that were identified to Dundon as creditors or parties in interest in these Chapter 11 Cases (the "Interested Parties"), as set forth on Schedule 1 attached hereto and incorporated herein (the "Interested Party List").

5. To the extent such a search indicated that Dundon has, or previously had, a relationship with any of the Interested Parties within the last three (3) calendar years, the identities of such parties and Dundon's relationship with such parties are set forth on Schedule 2 annexed hereto. Further, each of the representations identified on Schedule 2 are wholly unrelated to the Debtors and their Chapter 11 Cases.

6. Through its analysis, Dundon determined that it has no connections with the Debtors, creditors of the Debtors, their respective attorneys and accountants, the U.S. Trustee or any person employed in the Office of the U.S. Trustee or Judges for the United States Bankruptcy Court for the District of Delaware (and certain staff members) over the last three (3) calendar years, except as set forth above or on Schedule 2 hereto.

7. Based on the results of Dundon's analysis, and except as otherwise disclosed herein, Dundon does not hold or represent any interest adverse to the Committee, the Debtors or its estate in connection with the matters for which Dundon is to be employed.

8. To the best of my knowledge, information and belief after reasonable inquiry, Dundon is disinterested within the meaning of section 101(14) of the Bankruptcy Code, in that neither I, Dundon, nor any of its professionals:

(a) are creditors, equity security holders or insiders of the Debtors;

(b) are, or within two years before the Petition Date were, a director, officer or employee of the Debtors; or

(c) have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with or interest in the Debtors or for any other reason.

Dundon's Rates and Billing Practices

9. **Consulting Services.** In connection with the Consulting Services, Dundon intends to apply for compensation for professional services rendered in connection with the Chapter 11 Cases subject to the approval of this Court and in compliance with applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Local Rules and orders of the Court entered in these Chapter 11 Cases concerning compensation of professionals, on an hourly basis, plus reimbursement of actual, necessary expenses and other charges incurred by Dundon. The professionals primarily responsible for advising the Committee and their current standard hourly rates are:

Name	Title	Hourly Rate
Matthew Dundon	Principal	$1,090.00
Joshua Nahas	Managing Director	$960.00
Gary Lipson	Senior Advisor	$960.00
Christopher Podesfinski	Associate Director	$650.00
Christopher Kazantzis	Associate	$350.00

10. In addition, additional professionals may be involved as necessary and appropriate to advising the Committee. The current rates of Dundon professionals are as follows:

Title	Standard Hourly Rate
Principal	$1,090.00
Managing Director	$960.00
Senior Advisor	$960.00
Senior Director	$850.00
Director	$755.00
Associate Director	$650.00
Senior Associate	$495.00
Associate	$350.00

These rates are subject to change in accordance with Dundon billing practice and procedures. Dundon will advise the Committee, the Debtors and the U.S. Trustee of any increases in its hourly rates.[3]

11. **Transaction Services.** Separate from Dundon's hourly rates for Consulting Services discussed in more detail in the Application, Dundon may earn Transaction Fee(s) for services in relation to DIP Financing Transactions and/or Exit Transactions as more fully set forth in the Application.

12. Dundon's DIP Financing Fee is equal to and not duplicative of the DIP financing fee potentially charged by the Debtors' restructuring advisor[4] and all potential Transaction Fees (including DIP Financing Fees and Exit Transaction Fees) are reasonable and market-based to fairly compensate Dundon for its work.

13. Dundon does not intend to apply for, and shall not accept, any hourly fees for services which do, or which if it successful could have, resulted in the acceptance and payment of a Transaction Fee.

[3] Dundon generally increases its rates on or about July 1 of each year.

[4] *See* Docket No. 131.

14. The fee structure is consistent with and typical of compensation arrangements entered into by other comparable firms in connection with the rendering of similar services under similar circumstances.

15. In addition, it is Dundon's policy to charge its clients for all out-of-pocket expenses incurred related to its services. The expenses charged to clients include travel expenses, work-related meals, and other out-of-pocket expenses incurred in providing services to the Committee. Dundon will charge for these out-of-pocket expenses at cost to Dundon and in accordance with the Bankruptcy Rules and the Local Rules. Non-working travel time will be billed at 50% of a professional's standard hourly rate.

16. No agreement exists, nor will any be made, between Dundon and any other person regarding the sharing of compensation received by Dundon for its services in these Chapter 11 Cases, as described in Bankruptcy Rule 2016.

17. Dundon, as proposed financial advisor to the Committee, will report directly to the Committee. During the course of these Chapter 11 Cases, Cole Schotz and Dundon will reasonably coordinate responsibilities and services rendered to the Committee to avoid any unnecessary duplication and inefficiencies.

I hereby declare under the penalty of perjury that the foregoing is true and correct.

Executed on February 4, 2026
Salt Lake City, Utah

/s/ Matthew J. Dundon
Matthew J. Dundon
Principal
Dundon Advisers LLC

SCHEDULE 1

List of Potential Parties of Interest

Debtors
Apple Tree Life Sciences, Inc.
ATP Life Science Ventures, L.P.
ATP III GP, Ltd.
Apertor Pharmaceuticals, Inc.
Evercrisp Biosciences, Inc.
Initial Therapeutics, Inc.
Marlinspike Therapeutics, Inc.
Nereid Therapeutics
Nine Square Therapeutics, Inc.
Red Queen Therapeutics, Inc.

Banks
Banc of California
Citizens Bank
Eastern Bank
JP Morgan Chase Bank, N.A.
Western Alliance Bank

Vendors
AAAS
BioCentury, Inc.
Boston Globe Life Science Media
Canon
Digital Science & Research Solutions, Inc.
DirectUS
Integration Appliance, Inc.
Prendio LLC
Private Plane Expenses

Consultants
Andrew Bayliffe
Hughes and Hughes Bookkeeping
Newfront Consulting
Ollie Yuav

Contract Counterparties
1Password
American Copy Machines
BCL Search
Citeline
Directus Cloud
EndPointsNews
Evaluate Ltd.
Guidepoint Global, LLC
Insperity
Intapp
Massachusetts Medical Society
New England Journal of Medicine
Nextiva
Palmier Services Ltd.
Science AAAS
Sentient Jet
Springer Nature
Rockefeller University Press Journal of Experimental Medicine
The New York Times

Lessors
Contemporary Information Company
RXR HB Owner, LLC
230 Park Avenue Holdco, LLC

Utilities
8x8
Spectrum
Verizon

Insurance Providers
Coalition Insurance Solutions, Inc.
Continental Casualty Company
Federal Insurance Company
Houston Casualty Company
National Union Fire Insurance Company of Pittsburgh, Pa
Travelers Excess and Surplus Lines Company
Westfield Insurance Company

Bankruptcy Judges, Court Staff, and Clerk of Court for the District of Delaware
Chief Judge Karen B. Owens
Judge John. T. Dorsey
Judge Craig T. Goldblatt
Judge Thomas M. Horan
Judge Brenden L. Shannon
Judge Laurie Selber Silverstein
Judge Kate J. Stickles
Judge Mary F. Walrath
Al Lugano

Amanda Hrycak
Cacia Batts
Claire Brady
Danielle Gadson
Demitra Yeager
Jill Walker
Laura Haney
Laurie Capp
Lora Johnson
Marquietta Lopez
Nickita Barksdale
Nikki Washington
Paula Subda
Rachel Bello
Stephen L. Grant
Xavier Hunt

Staff of the Office of the United States Trustee, Region 3
Andrew R. Vara
Benjemin Hackman
Christine Green
Denis Cooke
Diane Giordano
Dion Wynn
Edith A. Serrano
Elizabeth Thomas
Fang Bu
Hannah M. McCollum
Holly Dice
James R. O'Malley
Jane Leamy
Jonathen Lipshie
Jonathen Nyaku
Joesph Cudia
Joseph McMahon
Juliet Sarkessian
Lauren Attix
Linda Casey
Linda Richenderfer
Micheal Panacio
Nyanquioi Jnoes
Ramona Harris
Richard Schepacarter
Rosa Sierra-Fox
Shakima L. Dortch
Timothy J. Fox, Jr.

Debtor Board Members
Bob Hugin
Edmund Graziani
Joesph Yanchik
Laura Forese
Loren Walensky
Margaret Bigelow
Mark Mitchnick
Matthew Jacobson
Meenu Chhabra Karson
Neena Kadaba
Paul Eisenberg
Seth Harrison
Spiros Liras
Tanja Kortemme

Debtor Officers
Lawrence Lum
John Reilly

Non-Debtor Portfolio Company Directors and Officers
Andrew Geall
Ankeet Jethwa
Anna Batarina
Antoine Papiernik
Aron Knickernocker
Brian Shoichet
Christopher Rader
David Lewis
Dennis Langer
Doug Godshall
Edward Yoon
Himani Bhalla
Jerry Karabelas
Jim Vaselli
Kathy Fernando
Leo Redmund
Mace Rothbenberg
Micheal Derkacz
Micheal Ehlers
Micheal Wasserman
Mikael Dolsten
Nathaniel Wang

Parinaz Aliahmad
Patrick Kennedy
Paul Da Silva Jardine
Suraj Shah
Todd Skacan
Yanay Ofran
Zack Scott
Zhen Su

Debtors' Professionals
B. Riley Restructuring Services, LLC
Grant Thornton, LLP
Murphy & King
Potter Anderson & Corroon LLP
Quinn Emanuel Urquhart & Sullivan, LLP
Verita
Walkers Global

Ordinary Course Professionals
Covington & Burling LLP
DiFilippo Corporate Finance Group
Elsberg Baker & Maruri PLLC
Maples Group
Marcum LLP (CBIZ, Inc.)
Mishcon De Reya LLP (UK)
Petra Funds Group, LLC
Pluris Valuation Advisors, LLC
Proskauer Rose LLP
Stout Risius Ross, LLC
WilliamsMarston LLC
Wilson Sonsini Goodrich & Rosati, P.C.

Rigmora Counsel
Debevoise & Plimpton LLP
Richards, Layton & Finger, P.A.

Portfolio Companies (aka non-debtor affiliates)
Aethon Therapeutics
Ascidian Therapeutics (fka Pulsar Bio Therapeutics)
Aulos Bioscience
Braeburn
Deep Apple Therapeutics
Galvaniz Therapeutics
Marengo Therapeutics
Replicate Bioscience

Management Debtors Top 20 Unsecured Creditors
Belay Solutions, LLC
Chelsea Technologies LLC
Cogent Communications, LLC
Echelon Fine Printing
Mark Mitchnick
RXR HB Owner LLC
The Agency Worldwide
The Regents of the University of California Berkeley

ATP Life Science Ventures, L.P. Equity Holders
Aaron Kantoff
Anna Batarina
Danjie (Eva) Zhou
David McIntyre
Hamade Family Trust (dated 6/18/2003)
Jonathan Waldstreicher
Julie A. Gionfriddo
Les Pommes LLC c/o/ Apple Tree Ventures Management LLC
Marie-Therese Afif
Paul Eisenberg
Rob Armstrong
Sally Jacob
Samuel Hall
Seth L. Harrison
Stephen G. Dance
The Lauren A. Farrell Trust (dated 5/18/2018)
William Engels

ATP III GP, Ltd. Equity Holder
Seth L. Harrison, MD

Red Queen Therapeutics, Inc. Top 20 Unsecured Creditors

Altasciences Company Inc.
Dechert LLP
Omega Systems Consultants
Omnicia, Inc.
Pace Analytical Life Sciences, LLC
Prendio LLC
Sarah Recchio

Red Queen Therapeutics, Inc. Equity Holders
Dana-Farber Cancer Institute, Inc.
Gregory Bird
Henry Herce
Loren Walensky
Marilynn Bersoff
Mark Mitchnick
Namrata Turaga
Paul Da Silva Jardine
Paul Eisenberg
Ravneesh Sachdev
Spiros Liras

Red Queen Therapeutics, Inc., Creditors
1Life Healthcare Inc.
9375-3408 Quebec Inc.
ADP, Inc
Amnet Systems LLC
Apple Tree Life Sciences, Inc.
Aptar Congers
Arthur J. Gallagher Risk Management Services, Inc.
Aruna K. Subramanian
Ascidian Therapeutics, Inc.
ATP Research and Development, Inc.
Bachem Americas, Inc.
Bay Valuation Advisors, LLC
BDO USA, LLP
Bend Financial, Inc.
Bill.com
Blue Cross Blue Shield
Boston Industries, Inc.
Brex
Browne Consulting Group
Cambridge Biolabs
Cambridge Trust
Cameron Wolfe
CD Chunn & Associates, Inc.
Charles River Laboratories, Inc.
Chien-Te Kent Tseng
Colorado State University
CPC Scientific, Inc.
Creative Biolabs Inc.
Credit Card Misc.
CT Corporation
Custom NMR Services, Inc.
Cytel Inc
Davey Smith
Delaware Secretary of State
Digital Insurance LLC
DocuSign, Inc.
Ea Spry Co. Inc.
eCtd Publishing LLC
Eric Smith
Eurofins Panlabs Discovery Services Taiwan, Ltd.
Eurofins Panlabs Inc
Eva Garland Consulting
EyeMed
Fragomen, Del Ray, Bernsen & Loewy, LLP
Franchise Tax Board
Gyros Protein Technologies
Halloran Consulting Group
Hansol Jang
Human Predictions LLC
ImQuest BioSciences
InCSD, LLC
Integral Molecular, Inc.
Intuit
IVEK Corporation
Janet Nokleby
John George McHutchison
JTR & Associates, LLC
K P'Das Bio-Consulting
KOC Consulting, LLC
Kyinno Biotechnology Co., Ltd.
Larry Smith
Latham BioPharm Group
LinkedIn Corporation
Loxley LLC
Lytica Therapeutics, Inc.
M3 USA Corporation
MED Regulatory & Toxicology Consulting,

LLC
Medizinische UniversitÃt Innsbruck
Meeting Protocol Worldwide LP
Meeting Protocol Worldwide LP-1
Microbiologics
NAGASE Specialty Materials NA LLC
Nanopharm Ltd.
Nanopharm Ltd. – USD
Next Breath
Organix
Peak Scientific Inc.
Pentagram Design Inc.
PPD Development, LP
ProPharma Group LLC
Protein Technologies, Inc.
Prudence Ciardullo
PurePEG, LLC
Quality Compliance Partners, Inc.
Raphael J. Landovitz
Retrovirox Inc.
RG Supply Chain Consulting Inc
Ron Moss
Shelterpoint
Shyam Kottilil
Sigmovir Biosystems Inc.
Sino Biological US Inc.
Solium Capital LLC
Southern Research Institute
Spences Services LLC
Sterling Corporation
Sun Life
The Agency Worldwide
The Catalytic Agency, LLC
Tremaine DMPK Consulting, LLC
True North Biopharm LLC
TS Pharma Experts LLC
Tufts Biolabs
University of Tennessee Health Science Center
Uppsala Monitoring Centre
Utah State University, Institute for Antiviral Research
V4Scientific
Vascumab LLC
Vectura Ltd.
ViraTree LLC
Vivitide
Waters Technologies Corporation
World Courier Inc
World Customs Brokerage Inc
WuXi AppTec (HongKong) Limited
YIN HTWE
Zahra Fathi

Initial Therapeutics, Inc. Top 20 Unsecured Creditors

Airgas USA, LLC
Armanino Advisory LLC
BDO USA LLP
CAS Chemical Abstract Services, Inc.
Curia Global, Inc.
Diamond Age Data Science LLC
Fisher Scientific Company, LLC
Forkable
Formulatrix LLC
Life Technologies Corporation
Mettler-Toledo Rainin, LLC
NexusCW Inc
Pegasus Purchaser, Inc.
Pharmaron, Inc.
Promega Corporation
ProteinSimple Checking BIN #39
Stemcell Technologies Inc
Tecan U.S. Inc
VWR International, LLC

Initial Therapeutics, Inc. Equity Holders

Alexander McCampbell
Brain Paegel
Brooke Olsen Blair
Danielle Carino
Fred Ward
Ilsa Kirby
James H. Doudna Cate
James and Jennifer Doudna Cate Living Trust (dated 1/2/2014)
Kevan Shokat
Kevan M. Shokat and Deborah Kamali, as trustees of the Shokat-Kamali Living Trust (dated 5/11/2012)
Margot Paulick
Mariwil Wong

Matthew Jacobson
Micheal Ehlers
Mohan Sivaraja
Mohit Trikha
Neena Kadaba
Peiwen Yu
Peter DiLaura
Phil Patten
Rachel Green
Rajesh Chopra
Sarah Smith
Spiros Liras
Stephanie Maiocco
Xiaoyue (April) Chen

Initial Therapeutics, Inc., Creditors

1Life Healthcare, Inc.
201 Spear Street
AA BLOCKS, LLC
AABC Testing & Certification
AACR
ABBEXA
Abcam, inc.
AC Hotel
AC Lab Instruments
Ace Parking
Acrotien ChemBio Inc
ACTenviro
Adobe
ADP
Agilent Technologies, Inc.
AIR-TITE Products Co., Inc.
AK Scientific, Inc.
Alaska Airlines
Alex's Mobile Notary Public Services
Alithea Genomics SA
Allucent US LLC
Alpha Teknova, Inc.
Amami San
Amaresh Keleta
Amazon
Amazon Business Prime
Amazon Capital Services, Inc.
Amazon Web Services
Ambeed, Inc.
American Association for Cancer Research
American Chemical Society
American Type Culture
American Type Culture Collection
Amith Vikram Rangarajan
Amoura Resturant
Ampersandpeople inc
Anecdote
Anirban Datta
Ann MacLaren
Antibodies Inc.
AnytimeLabTrader, LLC
Aon Consulting, Inc. (NJ)
Apconix Ltd.
Apertor Pharmaceuticals Inc.
Apexbio Technology LLC
Apicells Inc.
Are Café Resturant
Arthur Dean Olson (Dean Olson Patent Consulting)
Arthur J. Gallagher Risk Management Services, Inc.
Asana
ASCO
AstaTech Inc.
Astrill VPN
ATCC
ATP Research and Development, Inc.
Atum
Aurigene Pharmaceutical Services, Ltd.
Avanan
Aviva Systems Biology
Axis Enterprises Inc.
Axis Promotions
Azenta US, Inc.
Backhaus
BambooHR
Baskin-Robbins
Bay Valuation Advisors
Bayshore Safety & Industrial Supplies
BCBS
Beckman Coulter, Inc.
Becton, Dickinson & Co.
Bend Financial
Biocom California
BioDuro LLC
BioIVT

BioLegend
BioProcedure
Bio-Rad Laboratories, Inc.
Biospace
Biotage, LLC
Biotech Equipment Sales, Inc.
Bio-Techne Sales Corporation
Bliss Pops
Blossom Flower Deliver
Blue Bottle Coffee
BMG LABTECH, Inc.
Bordelon Marine
Boster Biological Technology
Box, Inc.
BPS Bioscience Technology
Brady Worldwide Inc
Brex Card – Expensify Linked
Brian Benjamin Tuch
Bridge Bank
Broken Yolk Café
Bronwyn Sanders
Browne Consulting Group
BUTCHER'S CUT
Cable 55
Caffe Central
Caffe Centro
California Chamber of Commerce
California Franchise Tax Board
California Pizza Kitchen
Cambridge Healthtech Institute
Cancer Research Institute
CC My Admin LLC
CDW LLC
Celine Calalang
Cell Culture Company
Cell Signaling Technology, Inc.
Certara USA, Inc.
Certified GeneTool, Inc.
Champions Oncology, Inc.
Charles Kreider (Kreider Consulting)
Charles River Laboratories
Chase Luck Bakery
Checkr
ChemAxon
ChemExplorer Company LTD
Chemglass Life Sciences
Chemical Computing Group
Chemrus Inc.
Che,scene Limited Liability Company
Chemtos LLC
Chico Marx
Chipotle Online
Christine Matthews (now Digital Insurance)
Christos Tzitzilonis
Chwen Cheng Chen
Cintas Corporation (AZ)
City of Burlingame
City of Sm Pw Parking
City of South San Francisco
City of Ssf Permit Dept
Clarke Consulting
Clarke S1 Sirn
Clipper
CLSA
CAN
Collaborative Drug Discovery, Inc.
Combi-Blocks Inc.
Computer Care
Copyright Clearance Center
Corovan Moving & Storage Co.
Costco
Creative Biogene, Inc.
Creative Biolabs, Inc.
Credit Card Misc.
Crossmint Pending
Crown Bioscience Netherlands BV
Crown Bioscience, Inc.
Crown Worldwide Moving and Storage, LLC
CSC
CSC Leasing CO
Cshl Meetings & Courses
CT Corporation
Culligan
Culligan Water
Curia Bio Inc. (dba Lake Pharma)
Cursor
CVS Pharmacy
Daicel Chiral Technologies
Danae Inc.
Daniel W Pierce
Data Kable Technology Inc
Dataworks Development Inc

DC3 Therapeutics, LLC
De Novo Software
Dead Eye Coffee Bar
Dean W. Felsher
Deep Apple Therapeutics, Inc.
Delaware State
DeNoix Inc
DHL
Diaago LLC
Dice Molecules SV, inc.
Divisadero Florist
DocuSign
Dojindo Molecular Technologies, Inc.
Dollar Tree
Donald Schmidt Jr.
DoorDash
Dorothy Rachel Green
Dotmatics, LLC
Dragonfly Design Group
Drug Design Group
Easy Learning Incubator LLC
EasyLlama
Eataly
eBay
EDITCO BIO INC.
Edward M. Driggers
Eirna Bio Ltd
Embassy Suites by Hilton
EMD Millipore Corporation
Emily Lin Karbarz
eMolecules, Inc.
Enamine US Inc.
Endpoints
Envoy
Eppendorf North America Inc.
Esposto's Catering
Esquire
Esraa Mohamed
Etsy
Eurofins Cerep SA
EUROFINS DISCOVEREX CORP
Eurofins Panlabs Inc.
EventCreate
Express Parking
Extra Space Storage
EyeMed
ezCater
Ezcater Ruse Woodfire
Farley's
FedEx
FlowJo LLC
Fragomen, Del Ray, Bensen, & Loewy, LLP
Frontage Laboratories, Inc.
Frontier Scientific Services Inc.
Fuchunju
FUJIFILM Wako Chemicals U.S.A. Corporation
G&P Biosciences LLC
Galen Laboratory Supplies LLC
GarboBio Inc. (AcceGen)
Gary F. Musso
Gaslamp
GeneCopoeia, Inc.
Genesee Scientific Corporation
GenScript USA, Inc.
Gifford Bioscience Ltd
Github
GlobalData
GoDaddy
Gordon Rees Scully Mansukhani, LLP
Grainger Industrial Supply
Grant Park Bistro
GraphPad
Greenhouse Software, inc.
GroupGreeting
GS Pharma Solutions, LLC
Hamamatsu Corporation
Headline Pa
Herb N' Kitchen
High Flying Foods
Hilton Hotels
HL Peninsula
HoneyBaked Ham
Horizon Discovery Biosciences Ltd
Hyatt
Ichika Sushi House
IKA-WORKS, Inc.
IKEA
Il Fornaio
Illumina, Inc.
Impark
India Quality Restaurant

Indian Clay Pot
Instacart
Integra Biosciences Corporation
Integrated DNA Technologies, Inc.
Integrative Drug Discovery ULC
Intuit
Invested Digital Group, Inc.
IQ Proteomics, LLC
Jack in the Box
Jackie McGrath Inc.
Jeff Hsu
Jena Bioscience GmbH
Jennifer Rocnik
Jessamyn Wead
Jetbrains Americas, Inc.
Jim Li
JMP Group Inc.
John Hood
Jonathan R Wong dba Enigma Search Solutions LLC
Joesph M. Llovet
Joesph Fan
Julius Khoo, Consultant
K.F. Howell Electric, Inc.
Kai Fa Qu Xi Lai Deng Jiu
Kenneth B. Wlasichuk
Kim F. McClure (Kb Pharma Consulting, LLC)
Klein Hersh International
Kristina Leandra Harter
Kristine Anne Gordon
Laurie L. LeDoux
LAZ Parking
Leibniz-Institut DSMZ-Deutsche Sammlung von Mikroorganismen und Zellkulturen GmbH
Lenovo Group
Letterman Digital Arts
LifeSpan Biosciences, Inc.
Lonza Walkersville, Inc.
Lowe's
Lucid Software
Luke's Lobster
Marriott
Marshall Scientific LLC
Martin S. Linsell
Maruzen International Co., Ltd.
Matphil Technologies, Inc. dba Pipette.com
McCormick Place
McMaster-Carr Supply
McNeill Baur PLLC
Meaghan An
MeCour Temperature Control, LLC
MedChemExpress LLC
Mercury Business Services LLC
Meso Scale Diagnostics, LLC
Metrion Biosciences Ltd.
Mzez Greek Fusion
Microsoft Office Azure
Microsoft Store
Miller & Lux Restaurant
MingHin Cuisine
Molecular Devices, LLC
MongoDB
Monnit Corporation
Moravek Biochemicals, Inc.
Morrow Service, Inc.
Mosaic Networx, LLC
Murigenics, Inc.
Murphy & King
MyBioSource, Inc.
NanoImaging Services, Inc.
Nanosyn, Inc.
National Screening Services LLC
Nationwide Screening Services
Nespresso
New England Biolabs
Nicholas Galli
Niu B
NorCal Water
Nothing Bundt Cakes
Novogene Corporation Inc.
NovoPro Bioscience Inc.
Novus Biologicals, LLC
Nuaire
NXT Power, LLC
Occupational Health Centers of North Carolina, P.C.
Okta, Inc
OLIVAS MEXICAN FOOD
On The Roll Catering and Events
One12

OneDigitial Topco LLC (Digital Insurance LLC)
OpenAI
Optibrium Limited
OriGene Technologies, Inc.
Osteria Panevino
Palace Hotel Dining
Panera Bread
Parking – SF
Parr Instrument Company
Pbss
Penske Truck Rental
PerformYard, Inc.
Peter DiLaura
Pharmablock (USA), Inc.
Phenomenex, Inc.
Pingyu Ding
Pizzeria Delfina
Plasmidsaurus Inc.
Posit Software, PBC
Postal Annex
Prendio LLC
Pressed Café
Prestige Lens Lab
PricewaterhouseCoopers LLC
Primordium Labs
Prince Scientific LLC
Profcontrol GmbH
Pronto!
Proteintech Group, Inc.
Qiagen LLC
Quintara Discovery, Inc.
R&D Systems, Inc.
Rachel Kindt
Ramen Hero
RayBiotech
RC TRITEC AG
Regents of the University of CA, Irvine
Remarkable
RevMAb Biosciences USA, Inc.
Revvity Health Sciences, Inc.
Revvity Signals Software, Inc.
Rhino Networks
Ribomaps LTD
Ricky P Jones
RIPOSO
Riposo Mobile
Road Master Club
Ronnie-Ray Abriam Orpilla
Rosemarie O'Shea
RStudio
Rudra Nand
Russell Reynolds Associates, Inc.
Sab Lai Thai Kitchen
Samuel Munroe
San Diego Convention Center
San Francisco Baking Institute
San Francisco International Airport
San Mateo County
San Mateo County Tax
Santa Cruz Biotechnology Inc
Sartorius Corporation
SBC Worldwide, LLC
Schrodinger, LLC
SciSummary
Secretary of State California
See's Candies
Seismic Installations
Selleck Chemicals LLC
Sensitech Inc.
Sentinel
Seqmatic LLC
SFMTA Parking
Shanghai Chempartner Co., Ltd.
Sheridan Books
Shisan Fan Sushi and Chinese Restaurant
Shred City
Sigma-Aldrich, Inc.
Signal Solutions Corporation
Silicon Valley Corporate Relocation
SL 2T, LLC (SmartLabs)
Slack
Slidexpress PVT LTD
SmartSign
SnapGene
SNPsaurus
Solium Plan Managers LLC
Soloprotect US
SPRO
Stanford University
Staples
Staples Advantage

Starbucks
Stella Alpina Osteria
Stericycle, Inc.
Steven A Smith
Steven J. Freedman
Steven R. Sando
Strategic Spaces
Subscription Cc Auth
Sun Life Financial
Surplus Solutions LLC
Susan Lyman
Susanne Steggerda
Swagelok Northern California
Synthego Corporation
System Biosciences
TAQUERIA LAS PENCAS
Target
Tastes On The Fly
Tax1099
TeamViewer
Technical Safety Services, LLC
Technology & Patent Research International, Inc.
Teledyne ISCO
Thai Satay Restaurant & Bar
The Agency Worldwide
The Catalytic Agency, LLC
The Cohen Group
The Grove Wine Bar & Kitchen - Cedar Park
The Home Depot
The Honest Company
The Regents of the University of California, San Francisco
The Speech Improvement Company Inc.
Therma LLX
Thomas Scientific Holdings Inc
Thorlabs, Inc.
Tim French
Total Wine & More
Traverse
TriLink Biotechnologies, LLC
Trip.com
Triton Appliance Repair
Uber
Uline, Inc
United
Unity Biotechnology
University of California, San Diego Small Molecule X-ray Crystallography Facility
UPS Supply Chain Solutions, Inc.
Urban Kitchen
USA Scientific, Inc.
USPS
Vector Laboratories, Inc.
Veloxee
Vincor Tech
Vistaprint
W.B. Mason Company, Inc.
W.W. Grainger, Inc.
Waterco of California
Wave
Wave Rock
West Coast Chemistry Services
White Elephant Restaurant
Whole Foods Market
Wise Guys Events
WPP Group USA, Inc. dba Ogilvy Health
WTMR
WuXi AppTec (Shanghi) Co., Ltd.
Yi Chao Fan
Yummy Home Plate
Zachary Sweeney (Edgewood Scientific Consulting)
Zazzle
Zoom Video Communications, Inc.
Zotero
Zymo Research Corporation

Marlinspike Therapeutics, Inc. Top 20 Unsecured Creditors

Advion, Inc.
Air Systems Technologies Inc
Aurigene Pharmaceutical Services LTD
Baylor College of Medicine
BDO USA, LLP
BioProcure, Inc.
Biotech Law Center, Inc.
Browne Consulting Group
Crown Castle International Corp.
CSC Leasing Co
Digital Insurance, LLC
Middlesex Gases & Technologies, Inc.

Norton Rose Fulbright US LLP
Pharmaron, Inc.
PPF OFF 150
Roger Benjamin Ruggeri
Safety Partners
Triumvirate Environmental, Inc.
Viva Biotech (Shanghai) Limited

Marlinspike Therapeutics, Inc. Equity Holders

Alessandro Boezio
Alexander McCampbell
Baylor College of Medicine
Calla Olson
Joesph Yanchik
Kristen Karlin
Paul Da Silva Jardine
Rajesh Chopra
Thomas Westbrook
Victor Rusu

Apertor Pharmaceuticals, Inc., Top 20 Unsecured Creditors

1640 South Loop Road LLC c/o Paceline Investors LLC
Alameda County Tax Collector
Benchling, Inc.
BioDuro, LLC
BioProcure, Inc.
Browne Consulting Group
Cell Signaling Technology, Inc.
Clarke Consulting, Inc.
CSC Leasing Company
De Lage Landen Financial Services, Inc.
Digital Insurance, LLC
Elsevier B.V.
IQ Proteomics, LLC
Laboratory Equipment Company
Life Technologies Corporation
Reaction Biology Corporation
Science Suite Inc. dba BioRender
University of North Carolina at Wilmington
Zhejiang Huida Biotech Co., Ltd.

Apertor Pharmaceuticals, Inc. Equity Holders

Bo Pang
Daniel Nomura
Edmund Graziani
Ericka Mendez
Jay Keasling
Jay D. Keasling Trust (Dated 8/5/2013)
Kevan Shokat
Lawrence Lum
Matthew Jacobson
Micheal White
Neena Kadaba
Paul De Silva Jardine
Paul Eisenberg
Paul Hawkins
Rajesh Chopra
Samantha Bucktrout
Shellwater & Company
Spiros Liras

Apertor Pharmaceuticals, Inc., Creditors

1Life Healthcare, Inc.
Abcam, Inc.
Abmole Bioscience Inc.
Abwiz Bio Inc
Access Plants LLC
Adams & Chittenden Scientific Glass
ADP
Advanced Chemical Transport
Agilent Technologies, Inc
AK Scientific, Inc.
Alameda County Environmental Health
Amazon Capital Services
Amazon Web Services
Ambeed Inc.
AmiD Biosciences LLC
AnaSpec Inc.
Apple Tree Life Sciences, Inc.
Applied Chemistry Solutions
Applikon Biotechnology, Inc.
Arash Samadi
Arthur J. Gallagher Risk Management Services, Inc.
ATCC
Atlas Copco Compressors LLC
ATP Research and Development, Inc.
Avanan, Inc

AxisPharm
Azenta US, Inc.
Bay Air Systems
Bay Valuation Advisors, LLC
BCBS MA
BDO USA, LLP
Becton, Dickinson and Company
Bend Financial, Inc.
Bill.com
Bio Basic Inc.
bioauxilium
Biocair Inc
BioLegend, Inc.
Biomatik Corporation
BioPharmics LLC
Bio-Rad Laboratories, Inc.
Biotage LLC
BiotechnologyJobs
Biozilla, LLC
Bordelon, Inc dba Ben's Dry Ice
Boston BioProducts, Inc.
BPS Bioscience, Inc.
Brex
BroadPharm
BUCHI Corporation
California Fire Detection
California Life Sciences
Carvill Consulting
Cayman Chemical Company Inc.
CC My Admin, LLC
CDW Direct, LLC
Cell Biolabs, Inc.
Charles River Discovery Research Services UK Limited [GBP]
Charles River Discovery Research Services UK Limited [USD]
Charles River Laboratories Cell Solutions, Inc.
Chemglass Life Sciences, LLC
Chemical Computing Group
Christian Puccetti
Chun Li
Cintas Corporation
Clarivate Analytics (US) LLC
Clark + Elbing LLP
CNA
Cole-Parmer Instrument Company, LLC
Collaborative Drug Discovery, Inc.
Combi-Blocks Inc.
Comcast
Commonwealth of Massachusetts
ComputerCare, LLC
Cooley LLP
Copyright Clearance Center, Inc.
CozChemix Limited
Creative Bioarray
Creative BioMart Inc.
Credit Card Misc.
CT Corporation
CTK Instruments LLC
Data Kable Technology Inc
Dean Olson Patent Consulting LLC
Demetrix, Inc.
Denisse Martinez
Diaago LLC
Diego Garrido Ruiz
Discovery Life Sciences
Discovery Scientific Solutions LLC
Diversified Laboratory Repair, Inc.
Dragonfly Design Group, Inc.
E-Control Systems, Inc.
Elson Electric
Epoch Life Science, Inc.
Eppendorf North America, Inc.
Esco Technologies, Inc.
EyeMed
Fahim Syed
FedEx Freight
First Choice Coffee Services
Fisher Scientific
Flowjo, LLC
Fortis Life Sciences fna Bethyl Laboratories
Foxx Life Sciences, LLC
Fragomen, Del Ray, Bernsen & Loewy, LLP
FUJIFILM Wako Chemicals U.S.A. Corporation
Genesee Scientific Corporation
Genewiz, LLC
Genprice Inc.
GenScript USA Inc.
Gentige USA Sales, LLC
Global Industrial

Global Life Sciences Solutions USA LLC
Gold Biotechnology
Gordon Research Conferences
Grainger
GSL Biotech, LLC
Hamilton Company, Inc.
Harris & Lee Environmental Sciences LLC
HARVARD APPARATUS
Heather Roth
Hooke Laboratories, Inc.
HIS
ICE Safety Solutions
IKA Works, Inc.
Independent Plumbing Co.
Infors USA Inc.
Ingenium Group, LLC
Initial Therapeutics, Inc.
Integra Biosciences Corporation
Integrated DNA Technologies, Inc.
Intuit, Inc
Invested Digital Group, Inc.
Iron Box LLC
Isomerase Therapeutics Ltd
James Kim
Jeff Wong
Jeremy Barton Consulting Inc.
Karen Sutherland
KBA Document Solutions, LLC
Kelly Services
Labelmaster
LABRepCo LLC
Lambda
Lawson Drayage, Inc
Leibniz- Institut DSMZ-Deutsche Sammlung von Mikroorganismen und Zellkulturen GmbH
Leo Letendre
LHE Bioscience Inc.
LI-COR Biotech, LLC
LI-COR, Inc.
Linde Gas & Equipment Inc.
Litmos US, L.P. f/k/a Solo Operations US, LLC
Lonza Walkersville, Inc.
Mallory Safety and Supply LLC
Marmon Biostatistics
Marvelgent Biosciences, Inc.
McMaster-Carr
MedChemExpress, LLC
MedSupply Partners
Mettler-Toledo Rainin, LLC
Mettler-Toledo, LLC
Microverse Studios
Molecular Devices
Mosaic Network
Nacalai USA, Inc.
Naomy Jareily Ruvalcaba
National Institute of Technology and Evaluation
Nationwide Screening Services
NBS Scientific, LLC
NCS Moving Services
Nefeli Chanoutsi
Neil Vasan
New England BioLabs, Inc.
New Life Scientific, Inc.
New Pig Corporation
North America Immigration Law Group
Novogene Corporation Inc.
Novus Biologicals, LLC
NW Seacology
NXT Power
Okta, Inc.
OTJ Architects
Oxford Nanopore Technologies Inc.
Peak Scientific, Inc.
Pete KOH Installations
Phenomenex, Inc.
Plasmidsaurus
Prenido LLC
Prestige Lens Lab
PricewaterhouseCoopers LLP
Promega Corporation
ProPharma Group LLC
Protection Plus Security Services
Proteintech Group, Inc.
Qiagen LLC
QuakeHold Industrial, Inc.
R&D Systems, Inc.
Rabin
Raissa Estrela Curado
Ray Liu Consulting LLC

Regina Roodhouse
Revvity Health Sciences, Inc.
Revvity Signals Software, Inc.
Roman Aguirre
Rose Citron
San Mateo County Tax Collector
Sandra Santulli-Marotto
Santa Cruz Biotechnology, Inc.
SBS Pharma Consulting
Sciencelo
Scientific Plastics Company, Inc.
SciSafe Inc.
Seismic Installations
Sentinel Benefits
SeqCenter
SEQUETECH CORP
Sequoia Signs & Graphics, Inc.
SFS Chemical Safety
Shimadzu Scientific Instruments, Inc.
Shinji Kasahara
Sigma-Aldrich, Inc.
Signalchem Biotech Inc.
Signosis, Inc.
Silas Burdick
Sino Biological US inc.
SL2T LLC
SmartSheet Inc.
SNPsaurus LLC
Solium Plan Managers LLC
SoloProtect US LLC
South San Francisco Fire Department
Southern Biotech
Staples Advantage
State of CA – Franchise Tax Board
State of Delaware – Division of Corporations
Stemcell Technologies Inc
STERIS Corporation
Strategic Spaces, LLC
STRUCTURAL ENGINEERS, INC.
Sun Life Assurance Company of Canada
Takara Bio USA, Inc.
Technical Safety Services, LLC
Teco Pneumatic
Tenova Pharmaceuticals Inc.
Thames Pharma Partners, LLC
The Cambridge Crystallographic Data Centre
The Cohen Group
The Ogilvy Group LLC
The Regents pf the University of California
Thermo Fisher Financial Services Inc.
Thomas Scientific, LLC
Tinghua Cao
Toronto Research Chemicals, Inc.
Tracking Solutions, Inc.
Twist Bioscience Corporation
Uline, Inc.
US Bank Equipment Finance
USA Scientific
Varigen Biosciences
Vascumab LLC
Veolia Water Technologies, Inc.
VWR International LLC
William A. Faubion, M.D.
Wuxi AppTec (HongKong) Limited
Wynden Stark LLC
XanTec bioanalytics GmbH
Zymo Research Corporation

Evercrisp Biosciences, Inc. Top 20 Unsecured Creditors

Admera Health, LLC
Agilent Technologies, Inc.
BioMetas Group Limited
Browne Consulting Group
Charles River Laboratories, Inc.
ChemPartner Corporation Chengdu ChemPartner Co., Ltd.
CSC Leasing Company
Digital Insurance, LLC
Fisher Scientific
Global Project Partners, LLC
Horizon Discovery Biosciences Ltd
Life Technologies Corporation
Marija Zecevic
Pegasus Purchaser Inc., - BioProcure LLC
Robert Thomas Abraham
Tanja Kortemme
VWR International, LLC
Wuxi AppTec (HongKong) Limited

Evercrisp Biosciences, Inc. Equity Holders

Ajeeth Adhikari

Benjamin Jagger
Brian Vash
Cody Krivacic
Geoffrey Berguig
Jennifer Doudna
Matthew Jacobson
Meenu Karson
Neena Kadaba
Peng Cheng Zhang
Raj Chopra
Spiros Liras
Stephanie Maiocco
Steven Strutt
Victor Rusu

Nine Square Therapeutics, Inc. Top 20 Unsecured Creditors
Amazon Web Services
Amprion, Inc.
Biognosys AG
Browne Consulting Group
CAS
Cell Signaling Technology, Inc.
FUJIFILM Cellular Dynamics, Inc.
Hooke Laboratories, LLC
Institut Curie
LeadTech Pharma, Inc.
Life Technologies Corporation
Mettler-Toledo Rainin, LLC
Pegasus Purchaser, Inc. (BioProcure)
Pharmaron
PLANET PHARMA, LLC
Regents of the University of Michigan
Revvity Health Sciences, Inc.
Viva Biotech (Shanghai) Limited
Wuxi AppTec United

Nine Square Therapeutics, Inc. Equity Holders
Aimee Kao
Alexander McCampbell
Brina Le
Chakrapani Kalyanaraman
Damoder Motati
Hoi-Shan (Helen) Wong
Jacob Meller Eriksen
James Summers
John Hood
Kristine A. Gordon
Lani Wu
Louise Heinrich
Mark Rosen
Matthew Jacobson
Micheal Ehlers
Neena Kadaba
Paul Da Silva Jardine
Robert Edwards
Robert Paul
Roberto Zoncu
Sami Barmada
Samuel Clark
Sarah Smith
Spiros Liras
Steven Altschuler
Tetsuya Kobayashi
Tina Schwabe

Rigmora LPs
Rigmora Biotech Investor One LP
Rigmora Biotech Investor Two LP

Nereid Therapeutics Equity Holders
Alex McCampbell
Alice Ting
Bahareh Eftekharzadeh
Chanelle Jumper
Cigall Kadoch
Dr. Clifford Brangwynne
Eugine Lee
Defne Yarar
Ivan Efremov
Jared Toettcher
John Reilly
Dr. Laura Forese
Matthew Jacobson
Robert Hugin
Spiros Liras

Nereid Therapeutics Top 20 Unsecured Creditors
Amnet Systems, LLC
AustinPX LLC

Beckman Coulter, Inc.
BioDuro, LLC
Crelux GmbH
Crystal Pharmatech Co., Ltd.
Eurofins Panlabs Inc.
Evotec US
Life Technologies Corporation
Nexomics BioSciences
Oncolines
Premier Research Consulting, LLC Reaction
Biology Corporation
RREF II 451D, LLC
Schrodinger, LLC
STA Pharmaceutical Hong Kong Limited
VectorBuilder, Inc.
Viva Biotech (Shanghai) Limited
Wuxi AppTec

SCHEDULE 2

Disclosures to Dundon Retention Application

- Dundon Advisers receives payment card services from JP Morgan Chase in the ordinary course of their respective businesses.
- Dundon Advisers receives payroll and employee benefits services from ADP in the ordinary course of their respective businesses.
- Dundon Advisers receives cloud document services from DocuSign in the ordinary course of their respective businesses.
- Dundon Advisers receives insurance services from ShelterPoint in the ordinary course of their respective businesses.
- Dundon Advisers receives cloud, productivity, messaging, market intelligence and recruiting services from Microsoft and its business units (including LinkedIn) in the ordinary course of their respective businesses.
- Dundon Advisers receives travel services from Hyatt, Marriott and its business units (including AC Hotels), Hilton and its business units (including Embassy Suits), Trip.com, Uber, United Airlines, and Alaksa Airlines in the ordinary course of their respective businesses.
- Dundon Advisers receives video and teleconference services from Zoom in the ordinary course of their respective businesses.
- Dundon Advisers receives courier services from UPS in the ordinary course of their respective businesses.
- Dundon Advisers receives courier and mail services from USPS in the ordinary course of their respective businesses.
- Dundon Advisers receives office supplies and other goods from Amazon and its affiliates (including Whole Foods), CVS, DoorDash, WB Mason and Costco in the ordinary course of their respective businesses.
- Dundon Advisers receives generative AI / LLM services from OpenAI in the ordinary course of their respective businesses.
- Dundon Advisers receives online accounting services from Intuit in the ordinary course of their respective businesses.

- Dundon Advisers purchases computer hardware from Lenovo in the ordinary course of their respective businesses.

- Dundon Advisers receives employee benefits services from Anthem BCBS in the ordinary course of their respective businesses; Dundon Advisers is not aware if the "Blue Cross Blue Shield" with whom the Debtors have a connection is Anthem BCBS.

- Dundon Advisers receives commercial banking services from Western Alliance in the ordinary course of their respective businesses.

- Dundon Advisers receives news services from The New York Times in the ordinary course of their respective businesses.

- Dundon Advisers receives courier and printing services from FedEx in the ordinary course of their respective businesses.

- A Dundon Advisers professional Jack Poynter was formerly employed by Citizens Bank. During such employment he was not involved in services for any of the Debtors, and he has no residual compensation interest in any interest Citizens Bank may hold in these Chapter 11 cases.

- Dundon Advisers and/or senior members of its staff, not in their respective individual capacities, but solely as fiduciaries in matters unrelated to these Chapter 11 cases, has engaged for services each of the following: Western Alliance Bank, Verita, Potter Anderson & Corroon, Grant Thornton, Proskauer Rose, Dechert, BDO, Amazon, CT Corporation, CSC, Intuit, Cooley, and US Bank.

- Dundon Advisers engaged Cole Schotz for transactional advice in a since-concluded engagement unrelated to these Chapter 11 Cases. Dundon and/or certain of its senior professionals, not in any individual capacity, but solely as fiduciaries, have engaged Cole Schotz as counsel in matters unrelated to these Chapter 11 Cases.

EXHIBIT B

Committee Declaration

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)

DECLARATION OF MICHAEL B. DILLING OF BAYLOR COLLEGE OF MEDICINE IN SUPPORT OF THE APPLICATION FOR AN ORDER PURSUANT TO 11 U.S.C. §§ 328(a) AND 1103 AUTHORIZING AND APPROVING THE RETENTION AND EMPLOYMENT OF DUNDON ADVISERS LLC AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF JANUARY 23, 2026

I, Michael B. Dilling, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. My name is Michael B. Dilling. I am over the age of 21 and am competent in all respects to make this declaration (the "Declaration"). I am the Chairperson of the Official Committee of Unsecured Creditors (the "Committee") of Apple Tree Life Sciences, Inc., *et al.* (collectively, the "Debtors") in these chapter 11 cases (the "Chapter 11 Cases").

2. I am authorized to make this Declaration in support of the Committee's application (the "Application")[2] seeking authorization to retain Dundon Advisers LLC. ("Dundon" or the "Firm") as its financial advisor pursuant to sections 328(a) and 1103(a) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq*. (the "Bankruptcy Code"), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 2014-1 of the Local Rules of the United

[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 not defined herein shall have the meanings ascribed to them in the Application.

States Bankruptcy Court for the District of Delaware (the "Local Rules"). Except as otherwise noted, I have personal knowledge as to all of the information set forth below.

Identity of Declarant

3. On January 20, 2026, the Office of the United States Trustee for Region 3 (the "U.S. Trustee") appointed a three-member Committee consisting of: (i) Fujifilm Cellular Dynamics Inc.; (ii) Global Project Partners, LLC; and (iii) Baylor College of Medicine. *See* Docket No. 194. Baylor College of Medicine serves as the Chairperson of the Committee.

4. On January 23, 2026, the Committee selected Cole Schotz P.C. ("Cole Schotz") as counsel and Dundon as financial advisor. As Chairperson and a member of the Committee, I was directly involved in the Committee's decision to retain Dundon.

Steps Taken to Ensure the Comparability of Engagement Terms

5. Dundon has informed the Committee that its rates for bankruptcy services are comparable to the rates Dundon charges for non-bankruptcy services, and that Dundon endeavors to set its hourly rates for professionals at levels competitive to those charged by peer firms.

6. After interviewing Dundon, the Committee found Dundon to be qualified for the present engagement. As described in the Application, the Committee selected Dundon as its financial advisor because of its extensive experience assisting, advising, and providing strategic advice to creditors and other entities in numerous chapter 11 cases of similar size and complexity to these Chapter 11 Cases. Dundon's professionals have provided restructuring and financial advisory services in numerous large cases across the United States

Rate Structure

7. Dundon has informed the Committee that its hourly rates in connection with the Consulting Services are subject to periodic adjustments (typically effective on or about July 1 of each year) to reflect economic and other conditions.

8. Dundon has informed the Committee that its Transaction Fee structure is consistent with and typical of compensation arrangements entered into by other comparable firms in connection with the rendering of similar services under similar circumstances.

9. By virtue of the foregoing, and for the reasons set forth in the Application and the Dundon Declaration, the Committee believes that Dundon is well qualified to represent the Committee in these Chapter 11 Cases as financial advisor and seeks entry of an order in the form attached to the Application authorizing the Committee to retain Dundon effective as of January 23, 2026 in accordance with the terms set forth in the Application and the Dundon Declaration.

Procedures Established to Supervise Fees and Expenses and Manage Costs

10. The Committee recognizes that it is its responsibility to closely monitor the billing practices of its financial advisor to ensure that the fees and expenses paid by the estate remains consistent with the Committee's expectations and exigencies of these cases. The Committee will review the invoices submitted by Dundon throughout these Chapter 11 Cases.

[*Remainder of Page Left Intentionally Blank*]

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 4, 2026

THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF APPLE TREE LIFE SCIENCES, INC., ET AL.

/s/ Michael B. Dilling

By: Michael B. Dilling
On behalf of Baylor College of Medicine, solely in its capacity as Chairperson of the Official Committee of Unsecured Creditors of Apple Tree Life Sciences, Inc., *et al*.

EXHIBIT C

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)

ORDER PURSUANT TO 11 U.S.C. §§ 328(a) AND 1103 AUTHORIZING AND APPROVING THE RETENTION AND EMPLOYMENT OF DUNDON ADVISERS LLC AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF JANUARY 23, 2026

Upon the application (the "Application")[2] of the Official Committee of Unsecured Creditors (the "Committee") of Apple Tree Life Sciences, Inc., *et al.* (collectively, the "Debtors") for entry of an order, pursuant to sections 328(a) and 1103(a) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), authorizing the Committee to retain and employ Dundon Advisers LLC ("Dundon") as its financial advisor in connection with the Debtors' chapter 11 cases (the "Chapter 11 Cases") effective as of January 23, 2026, and upon the declaration of Matthew J. Dundon a principal of Dundon (the "Dundon Declaration") and the declaration of Michael B. Dilling, solely in his capacity as Chairperson of the Committee (the "Committee Declaration", and together with the Dundon Declaration, the "Declarations"); and it appearing that the professionals Dundon who will perform services on behalf of the Committee in the Chapter 11 Case are duly qualified to practice before this Court; and the United States District Court for the

[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 defined herein shall have the meanings ascribed to such terms in the Application.

District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the Court under 28 U.S.C. § 157 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 this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and the Court finding, based on the representations made in the Application and the Declarations, that Dundon does not represent any interest adverse to the Committee or the Debtor's estate with respect to the matters upon which it is to be engaged, that it is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code, that its employment is necessary and appropriate and in the best interests of the Committee and the Debtor's estate; and finding that adequate notice of the Application having been given; and it appearing that no other notice need be given; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED AND DECREED that:

1. The Application is APPROVED as set forth herein.

2. The Committee is hereby authorized to retain and employ Dundon as its financial advisor in these Chapter 11 Cases, effective as of January 23, 2026, pursuant to sections 328 and 1103 of the Bankruptcy Code, as contemplated by the Application and on the terms provided in the Application and the Dundon Declaration, and Dundon is authorized to perform the services set forth in the Application and in the Dundon Declaration, as may be modified herein.

3. For the avoidance of doubt, except to the extent set forth herein, Dundon's fee and expense structure relating to Dundon's Transaction Services is approved pursuant to section 328 of the Bankruptcy Code.

4. Dundon shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with these Chapter 11 Cases in compliance with sections 330 and 331 of the Bankruptcy Code for the Consulting Services and section 328 of the Bankruptcy Code for the Transaction services and shall also comply with the applicable provisions of the Bankruptcy Rules, Local Rules, and any other applicable procedures and orders of the Court.

5. Any time spent by Dundon on Transaction Services that could earn Dundon a Transaction Fee shall not be subject to Dundon's hourly rates.

6. Notwithstanding the preceding paragraphs, with respect to Dundon's Consulting Services, the compensation and fees and expenses to be paid to Dundon shall be subject to review under section 330 of the Bankruptcy Code, and with respect to Dundon's Transaction Services, the compensation and fees and expenses to be paid to Dundon, including without limitation, the DIP Financing Fee and Exit Transaction Fee, shall be reviewable under section 328 of the Bankruptcy Code; *provided*, *however*, that with respect to the Transaction Services, the U.S. Trustee shall retain the right to object to the compensation and fees and expenses paid to Dundon pursuant to the Application, based on the reasonableness standard provided for in section 330 of the Bankruptcy Code.

7. Dundon is entitled to reimbursement by the Debtors for reasonable expenses incurred in connection with the performance of its engagement pursuant to the Application, including without limitation, the reasonable fees, disbursements, and other charges of Dundon's counsel, in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, applicable orders of this Court, and the fee guidelines promulgated by the Office of the United States Trustee. Notwithstanding the foregoing, Dundon shall only be reimbursed for any legal fees or costs incurred in connection with these Chapter 11 Cases to the extent permitted under applicable law and the decisions of this Court; *provided*, *however*, Dundon

shall not seek reimbursement of any fees incurred defending any of its fee applications in these Chapter 11 Cases.

8. No amounts shall be paid to Dundon for fees related to Transaction Services absent an order of this Court approving a fee application filed on notice to parties in interest in these Chapter 11 Cases under the procedures set forth in any order establishing procedures for compensation and reimbursement of professionals (the "Interim Compensation Procedures").

9. Dundon shall file fee statements with time entries and requests for reimbursement that comply with Bankruptcy Rule 2016 and the Local Rule 2016-1, except as expressly set forth in this Order, pursuant to the deadlines and other procedures specified for such fee statements under any order or procedures approved by this Court. Dundon shall be entitled to file and serve a fee statement (that otherwise complies with the Interim Compensation Procedures) immediately upon the consummation of a DIP Financing Transaction or Exit Transaction, with respect to any DIP Financing Fee or Exit Transaction Fee. For the avoidance of doubt, any portion of a DIP Financing Fee or Exit Transaction Fee subject to an objection filed with the Court shall not be payable to Dundon until such objection has been resolved.

10. In light of the Transaction Services to be provided by Dundon and the compensation structure set forth in the Application, solely with respect to the Transaction Services, Dundon and its professionals shall be excused from: (i) the requirement to maintain or provide detailed time records in accordance with Bankruptcy Rule 2016(a) and Local Rule 2016-1; and (ii) conforming with a schedule or hourly rates for its professionals. Instead Dundon shall maintain reasonably detailed time records in half hour (0.5) increments containing descriptions of the Transaction Services rendered for the Committee, and the individuals who provided those services, and will present such records together with its fee applications filed with this Court. For the Consulting

Services, Dundon shall maintain time records in accordance with Bankruptcy Rule 2016(a) and Local Rule 2016-1.

11. Dundon shall provide ten (10) business days' notice to the Debtor, the Committee, and the U.S. Trustee before any increases in the rates set forth in the Application are implemented and shall file such notice with the Court. The U.S. Trustee retains all rights to object to any rate increase on all grounds, including the reasonableness standard set forth in section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

12. Notwithstanding anything in the Application to the contrary, Dundon shall (i) to the extent that it uses the services of independent contractors or subcontractors (collectively, the "Contractors") in this case, pass through the cost of such Contractors at the same rate that Dundon pays the Contractors; (ii) seek reimbursement for actual costs only; (iii) ensure that the Contractors are subject to the same conflicts checks as required for Dundon; and (iv) file with this Court such disclosures required by Bankruptcy Rule 2014.

13. Dundon shall use its reasonable efforts to avoid any duplication of services provided by any of the Committee's other retained professionals in this Chapter 11 Case.

14. To the extent that there may be any inconsistency among the terms of the Application, the Dundon Declaration and this Order, the terms of this Order shall govern.

15. The Committee is authorized and empowered to take all actions necessary to effectuate the relief granted by this Order.

16. Notwithstanding the possible applicability of Bankruptcy Rules 6004, 7062, 9014 or otherwise, or any Local Rule that might otherwise delay the effectiveness of this Order, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

17. The Court shall retain jurisdiction to hear and determine all matters arising under or related to the implementation or interpretation of this Order.