

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)

**SECOND AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON APRIL 28, 2026 AT 10:00 A.M. (ET)**

This proceeding will be conducted in-person. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom.

Please refer to Judge Silverstein’s Chambers Procedures (<https://www.deb.uscourts.gov/judge-laurie-selber-silverstein>) and the Court’s website (<https://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Silverstein’s expectations of remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (ET) the business day before the hearing unless otherwise noticed using the *eCourtAppearances* tool available on the Court’s website.

ADJOURNED MATTER:

1. Debtors’ Application for an Order Pursuant to 11 U.S.C. §§ 327 and 328(a), Fed. R. Bankr. P. 2014 and 2016, and Local Rules 2014-1 and 2016-1 Authorizing the Employment and Retention of Atlantic-Pacific Capital, Inc. as Global Placement Agent for the Debtors Effective as of February 18, 2026 [Docket No. 480 – filed March 26, 2026]

Response/Objection Deadline: April 9, 2026 at 4:00 p.m. (ET); extended until April 13, 2026 at 4:00 p.m. (ET) for Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP (“Rigmora”).

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 **Amended items appear in bold.**



Responses/Objections Received:

- i. Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Application for an Order Pursuant To 11 U.S.C. §§ 327 and 328(a), Fed. R. Bankr. P. 2014 and 2016, and Local Rules 2014-1 and 2016-1 Authorizing the Employment and Retention of Atlantic-Pacific Capital, Inc. as Global Placement Agent for the Debtors Effective as of February 18, 2026 [Docket No. 535 – filed April 13, 2026]
- ii. [SEALED] Declaration of Shannon Rose Selden in Support of the Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Application for an Order Pursuant To 11 U.S.C. §§ 327 and 328(a), Fed. R. Bankr. P. 2014 and 2016, and Local Rules 2014-1 and 2016-1 Authorizing the Employment and Retention of Atlantic-Pacific Capital, Inc. as Global Placement Agent for the Debtors Effective as of February 18, 2026 [Docket No. 536 – filed April 13, 2026]
- iii. [Redacted] Declaration of Shannon Rose Selden in Support of the Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Application for an Order Pursuant To 11 U.S.C. §§ 327 and 328(a), Fed. R. Bankr. P. 2014 and 2016, and Local Rules 2014-1 and 2016-1 Authorizing the Employment and Retention of Atlantic-Pacific Capital, Inc. as Global Placement Agent for the Debtors Effective as of February 18, 2026 [Docket No. 557 – filed April 16, 2026]
- iv. Notice of Filing of Amended Redacted Selden Declaration [Docket No. 574 – filed April 23, 2026]

Related Documents: None.

Status: This matter is being adjourned to a date to be determined.

RESOLVED MATTERS:

2. Debtors' Fourth Motion for Entry of an Order (I) Extending Time to File Rule 2015.3 Financial Report for Braeburn, Inc. and (II) Granting Related Relief [Docket No. 486 – filed March 27, 2026]

Response/Objection Deadline: April 10, 2026 at 4:00 p.m. (ET).

Responses/Objections Received: None

Related Documents:

- A. Certificate of No Objection Regarding Debtors' Fourth Motion for Entry of an Order (I) Extending Time to File Rule 2015.3 Financial Report for Braeburn, Inc. and (II) Granting Related Relief [Docket No. 541 – filed April 13, 2026]
- B. Fourth Order (I) Extending Time to File Rule 2015.3 Financial Report for Braeburn, Inc. and (II) Granting Related Relief [Docket No. 552 – entered April 14, 2026]

Status: The order has been entered. No hearing is necessary.

- 3. Debtors' Motion for Entry of an Order Extending the Time Within Which Unexpired Leases of Nonresidential Real Property May Be Assumed or Rejected [Docket No. 511 – filed April 2, 2026]

Response/Objection Deadline: April 13, 2026 at 4:00 p.m. (ET).

Responses/Objections Received: None

Related Documents:

- A. Certificate of No Objection Regarding Debtors' Motion for Entry of an Order Extending the Time Within Which Unexpired Leases of Nonresidential Real Property May Be Assumed or Rejected [Docket No. 551 – filed April 14, 2026]
- B. Order Extending the Time Within Which Unexpired Leases of Nonresidential Real Property May Be Assumed or Rejected [Docket No. 555 – entered April 16, 2026;]

Status: The order has been entered. No hearing is necessary.

MATTER WITH CERTIFICATE OF NO OBJECTION:

- 4. Debtors' Motion for Entry of an Order Authorizing the Filing of Certain Portfolio Company Information Under Seal in Connection with Bankruptcy Rule 2015.3 Reports [Docket No. 487 – filed March 27, 2026]

Response/Objection Deadline: April 10, 2026 at 4:00 p.m. (ET).

Responses/Objections Received: None

Related Documents:

- A. Certificate of No Objection Regarding Debtors' Motion for Entry of an Order Authorizing the Filing of Certain Portfolio Company Information Under Seal in

Connection with Bankruptcy Rule 2015.3 Reports [Docket No. 543 – filed April 13, 2026]

Status: A certificate of no objection has been filed. No hearing is necessary unless the Court has questions.

MATTERS GOING FORWARD:

5. Debtors’ Motion for Entry of an Order (I) Approving the Retention and Employment of B. Riley Restructuring Services, LLC to Provide the Debtors with a Chief Restructuring Officer and Additional Staff Effective as of the Petition Date; (II) Designating Perry M. Mandarino as the Chief Restructuring Officer to the Debtors; and (III) Granting Related Relief [[Docket No. 131](#) – filed January 8, 2026]

Response/Objection Deadline: January 22, 2026 at 4:00 p.m. (ET). Extended to January 29, 2026 at 4:00 p.m. (ET) for Rigmora.

Responses/Objections Received:

- i. [SEALED] Limited Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors’ Motion for Entry of an Order (I) Approving the Retention and Employment of B. Riley Restructuring Services, LLC to Provide the Debtors with a Chief Restructuring Officer and Additional Staff Effective as of the Petition Date; (II) Designating Perry M. Mandarino as the Chief Restructuring Officer to the Debtors; and (III) Granting Related Relief [Docket No. 225 – filed January 29, 2026]
- ii. [Redacted] Limited Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors’ Motion for Entry of an Order (I) Approving the Retention and Employment of B. Riley Restructuring Services, LLC to Provide the Debtors with a Chief Restructuring Officer and Additional Staff Effective as of the Petition Date; (II) Designating Perry M. Mandarino as the Chief Restructuring Officer to the Debtors; and (III) Granting Related Relief [[Docket No. 227](#) – filed January 29, 2026]
- iii. Supplemental Statement of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP Regarding Matters Scheduled for the April 28, 2026 Hearing [[Docket No. 589](#) – filed April 27, 2026] (the “Supplemental Statement”)

Related Documents:

- A. Debtors’ Omnibus Reply to (A) Limited Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors’ Motion for Entry of an Order Authorizing the Retention and Employment of Quinn Emanuel Urquhart & Sullivan, LLP as Co-Counsel for the Debtors Effective as of the Petition Date, and (B) Limited Objection of Rigmora Biotech Investor One LP and Rigmora Biotech

Investor Two LP to Debtors' Motion for Entry of an Order (I) Approving the Retention and Employment of B. Riley Restructuring Services, LLC to Provide the Debtors with a Chief Restructuring Officer and Additional Staff Effective as of the Petition Date; (II) Designating Perry M. Mandarino as the Chief Restructuring Officer to the Debtors; and (III) Granting Related Relief [[Docket No. 316](#) – filed February 13, 2026]

- B. Supplemental Declaration of Perry M. Mandarino in Support of Debtors' Motion for Entry of an Order (I) Approving the Retention and Employment of B. Riley Restructuring Services, LLC to Provide the Debtors with a Chief Restructuring Officer and Additional Staff Effective as of the Petition Date; (II) Designating Perry M. Mandarino as the Chief Restructuring Officer to the Debtors; and (III) Granting Related Relief [[Docket No. 349](#) – filed on February 17, 2026]

Status: This matter is resolved and going forward on an uncontested basis.

6. Debtors' Application for an Order Authorizing the Retention and Employment of Quinn Emanuel Urquhart & Sullivan, LLP as Co-Counsel for the Debtors Effective as of the Petition Date [[Docket No. 132](#) – filed January 8, 2026]

Response/Objection Deadline: January 22, 2026 at 4:00 p.m. (ET). Extended to January 29, 2026 at 4:00 p.m. (ET) for Rigmora and to February 10, 2026 for the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee").

Responses/Objections Received:

- i. Informal response from to U.S. Trustee.
- ii. [SEALED] Limited Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Application for an Order Authorizing the Retention and Employment of Quinn Emanuel Urquhart & Sullivan, LLP as Co-Counsel for the Debtors Effective as of the Petition Date [[Docket No. 224](#) – filed January 29, 2026]
- iii. [Redacted] Limited Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Application for an Order Authorizing the Retention and Employment of Quinn Emanuel Urquhart & Sullivan, LLP as Co-Counsel for the Debtors Effective as of the Petition Date [[Docket No. 226](#) – filed January 29, 2026]
- iv. Supplemental Statement of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP Regarding Matters Scheduled for the April 28, 2026 Hearing [[Docket No. 589](#) – filed April 27, 2026]

Related Documents:

- A. Debtors' Omnibus Reply to (A) Limited Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Motion for Entry of an Order Authorizing the Retention and Employment of Quinn Emanuel Urquhart & Sullivan, LLP as Co-Counsel for the Debtors Effective as of the Petition Date, and (B) Limited Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Motion for Entry of an Order (I) Approving the Retention and Employment of B. Riley Restructuring Services, LLC to Provide the Debtors with a Chief Restructuring Officer and Additional Staff Effective as of the Petition Date; (II) Designating Perry M. Mandarino as the Chief Restructuring Officer to the Debtors; and (III) Granting Related Relief [[Docket No. 316](#) – filed February 13, 2026]
- B. Supplemental Declaration of Patricia B. Tomasco in Support of the Debtors' Application for an Order Authorizing the Retention and Employment of Quinn Emanuel Urquhart & Sullivan, LLP as Co-Counsel for the Debtors as of the Petition Date [[Docket No. 509](#) – filed April 1, 2026]
- C. Notice of Filing of Revised Proposed Order Authorizing the Debtors to Retain and Employ Quinn Emanuel Urquhart & Sullivan, LLP as Co-Counsel for the Debtors Effective as of the Petition Date [[Docket No. 593](#) – Filed April, 2026]

Status: The informal comments from the U.S. Trustee have been resolved. This matter is going forward solely as to the objections noted in the Supplemental Statement.

- 7. Debtors' Motion for Approval of (I) Exit Financing Procedures, (II) Payment of Upfront Due Diligence Fee and Stalking Horse Protections, and (III) Form and Manner of Notice Related Thereto [[Docket No. 478](#) – filed March 25, 2026]

Response/Objection Deadline: April 8, 2026 at 4:00 p.m. (ET); extended to April 13, 2026 at 4:00 p.m. for the U.S. Trustee and Rigmora.

Responses/Objections Received:

- i. Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Motion for Approval of (I) Exit Financing Procedures, (II) Payment of Upfront Due Diligence Fee and Stalking Horse Protections, and (III) Form and Manner of Notice Related Thereto [[Docket No. 539](#) – filed April 13, 2026]
- ii. Declaration of Shannon Rose Selden in Support of the Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Motion for Approval of (I) Exit Financing Procedures, (II) Payment of Upfront Due Diligence Fee and Stalking Horse Protections, and (III) Form and Manner of Notice Related Thereto [[Docket No. 540](#) – filed April 13, 2026]

- iii. Informal comments from the U.S. Trustee
- iv. Supplemental Statement of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP Regarding Matters Scheduled for the April 28, 2026 Hearing [[Docket No. 589](#) – filed April 27, 2026]

Related Documents:

- A. Debtors’ Reply to Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors’ Motion for Approval of (I) Exit Financing Procedures; (II) Payment of Upfront Due Diligence Fee and Stalking Horse Protections; and (III) Form and Manner of Notices Related [[Docket No. 579](#) – filed April 23, 2026]
- B. Debtors’ Witness and Exhibit List for Hearing on April 28, 2026 at 10:00 A.M. (ET) [[Docket No. 588](#) – filed April 27, 2026]
- C. **Notice of Filing of Revised Proposed Order for Approval of (I) Exit Financing Solicitation Procedures, (II) Payment of Upfront Due Diligence Fee and Stalking Horse Protections, and (III) Form and Manner of Notice Related Thereto** [[Docket No. 596](#) – filed April 28, 2026]

Status: The informal comments from the U.S. Trustee have been resolved. **A Notice of Filing of Revised Proposed Order has been filed.** This matter is going forward.

- 8. Debtors’ Motion for Entry of an Order (I) Extending the Debtors’ Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code and (II) Granting Related Relief [[Docket No. 512](#) – filed April 2, 2026]

Response/Objection Deadline: April 13, 2026 at 4:00 p.m. (ET).

Responses/Objections Received: None

- i. Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors’ Motion for Entry of an Order (I) Extending the Debtors’ Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code and (II) Granting Related Relief [[Docket No. 537](#) – filed April 13, 2026]
- ii. Declaration of Shannon Rose Selden in Support of the Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors’ Motion for Entry of an Order (I) Extending the Debtors’ Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code and (II) Granting Related Relief [[Docket No. 538](#) – filed April 13, 2026]

- iii. Notice of Filing of Corrected Exhibit to Declaration of Shannon Rose Selden in Support of the Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Motion for Entry of an Order (I) Extending the Debtors' Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code and (II) Granting Related Relief [[Docket No. 547](#) – filed April 14, 2026]
- iv. Supplemental Statement of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP Regarding Matters Scheduled for the April 28, 2026 Hearing [[Docket No. 589](#) – filed April 27, 2026]

Related Documents:

- A. Debtors' Reply to Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Motion for Entry of an Order (I) Extending the Debtors' Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code and (II) Granting Related Relief [[Docket No. 576](#) – filed April 23, 2026]

Status: This matter is resolved and going forward on an uncontested basis.

- 9. Motion of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to File Under Seal Certain of the Exhibits Attached to the Selden Declaration [[Docket No. 556](#) – filed April 16, 2026]

Response/Objection Deadline: April 28, 2026 at 10:00 a.m. (ET).

Responses/Objections Received: None

Related Documents:

- A. [SEALED] Declaration of Shannon Rose Selden in Support of the Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Application for an Order Pursuant to 11 U.S.C. §§ 327 and 328(a), Fed. R. Bankr. P. 2014 and 2016, and Local Rules 2014-1 and 2016-1 Authorizing the Employment and Retention of Atlantic-Pacific Capital, Inc. as Global Placement Agent for the Debtors Effective as of February 18, 2026 [[Docket No. 536](#) – filed April 13, 2026]
- B. [Redacted] Declaration of Shannon Rose Selden in Support of the Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Application for an Order Pursuant To 11 U.S.C. §§ 327 and 328(a), Fed. R. Bankr. P. 2014 and 2016, and Local Rules 2014-1 and 2016-1 Authorizing the Employment and Retention of Atlantic-Pacific Capital, Inc. as Global Placement Agent for the Debtors Effective as of February 18, 2026 [[Docket No. 557](#) – filed April 16, 2026]

- C. Notice of Filing of Amended Redacted Selden Declaration [[Docket No. 574](#) – filed April 23, 2026]

Status: This matter is going forward.

10. Debtors’ Motion to Stay Effectiveness of Order for Relief from Stay Pending Resolution of Motion to Clarify [[Docket No. 591](#) – filed April 27, 2026]

Response/Objection Deadline: TBD

Responses/Objections Received:

- i. **Emergency Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors’ Motion to Stay Effectiveness of Order for Relief from Stay Pending Resolution of Motion to Clarify** [[Docket No. 595](#) – filed April 28, 2026]

Related Documents:

- A. Debtors’ Motion for Relief from Order Partially Granting Motion for Relief from Stay, or in the Alternative to Confirm the Scope of the Automatic Stay [[Docket No. 590](#) – filed April 27, 2026]
- B. Debtors’ Motion for an Order Shortening Notice and Objection Periods with Respect to (I) Debtors’ Motion to Stay Effectiveness of Order for Relief from Stay Pending Resolution on Motion to Clarify, and Establishing a Hearing on (II) Debtors’ Motion for Relief from Order Partially Granting Motion for Relief from Stay, or in the Alternative to Confirm the Scope of the Automatic Stay [[Docket No. 592](#) – filed April 27, 2026] (the “Motion to Shorten”)

Status: The Debtors filed the Motion to Shorten requesting this matter go forward at the April 28, 2026 hearing. Accordingly, the Debtors respectfully request this matter go forward.

[Signature Page Follows]

Dated: April 28, 2026
Wilmington, Delaware

Andrew M. Berdon, Esq. (admitted *pro hac vice*)
Patricia B. Tomasco, Esq. (admitted *pro hac vice*)
Rachel E. Epstein, Esq. (admitted *pro hac vice*)
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*Proposed Counsel to the Debtors and Debtors in
Possession*

Respectfully submitted,

/s/ Ethan H. Sulik

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