

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

APPLE TREE LIFE SCIENCES, INC.,

Debtor.

Chapter 11

Case No. 25-12177 (LSS)

Re: Docket No. 7

**NOTICE OF FILING OF CORRECTED EXHIBITS TO [REDACTED] MOTION OF
RIGMORA BIOTECH INVESTOR ONE LP AND RIGMORA BIOTECH INVESTOR
TWO LP FOR AN ORDER (I) DISMISSING THE CHAPTER 11 CASES AND/OR (II)
GRANTING RELATED RELIEF FROM THE AUTOMATIC STAY**

PLEASE TAKE NOTICE that, on December 13, 2025, Rigmora Biotech Investor One LP, by its general partner Unicorn Biotech Ventures One Ltd and Rigmora Biotech Investor Two LP, by its general partner Unicorn Biotech Ventures Two Ltd filed the *[Redacted] Motion of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP for an Order (I) Dismissing the Chapter 11 Cases and/or (II) Granting Related Relief from the Automatic Stay* [Case No. 25-12177, D.I. 7] (the “**Motion**”).

PLEASE TAKE FURTHER NOTICE that the LPs hereby file Exhibits Y and Z (the “**Exhibits**”) as referenced in the Motion and as attached hereto in **Exhibit 1**.

PLEASE TAKE FURTHER NOTICE that the Motion and the Exhibits and/or copies of any related document may be examined by interested parties on the Court’s electronic docket for the above-captioned chapter 11 case, which is posted on the Internet at www.deb.uscourts.gov (a PACER login and password are required and can be obtained through the PACER Service Center at www.pacer.psc.uscourts.gov).



Dated: December 13, 2025
Wilmington, Delaware

**RICHARDS, LAYTON &
FINGER, P.A.**

/s/ Nicholas A. Franchi

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Respectfully Submitted,

DEBEVOISE & PLIMPTON LLP

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Co-Counsel for Rigmora Biotech Investor One LP (by and through its general partner Unicorn Biotech Ventures One Ltd) and Rigmora Biotech Investor Two LP (by and through its general partner Unicorn Biotech Ventures Two Ltd)

Exhibit 1

The Exhibits

EXHIBIT Y



BY EMAIL

26 November 2025

Our Ref: JG/SW/RB/197133

Campbells LLP
Floor 4, Willow House
Cricket Square
Grand Cayman KY1-9010
Cayman Islands

Attention: Liam Faulkner, Hugo Farmer and Jordie Fienberg

Dear Campbells

**UNICORN BIOTECH VENTURES ONE LTD (IN ITS CAPACITY AS GENERAL PARTNER OF RIGMORA BIOTECH INVESTOR ONE LP) AND UNICORN BIOTECH VENTURES TWO LTD (IN ITS CAPACITY AS GENERAL PARTNER OF RIGMORA BIOTECH INVESTOR TWO LP) V ATP III GP, LTD (IN ITS CAPACITY AS GENERAL PARTNER OF ATP LIFE SCIENCE VENTURES, L.P.)
CAUSE NO. FSD 146 OF 2025 (JAJ)**

**IN THE MATTER OF ATP LIFE SCIENCE VENTURES, L.P.
CAUSE NO. FSD 151 OF 2025 (JAJ)**

1. We refer to your letter dated 14 November 2025.
2. To the extent it is implied in your letter that our client has failed in any duty to your clients in respect of the provision of information on the cash available to the Partnership and third-party payments to portfolio companies since our second letter dated 8 September 2025, this is strongly denied. The GP has, and continues to, fully comply with its reporting obligations pursuant to the LPA.
3. Our client provides the following responses to your requests (for which no proper justification was given):

a. The total amount of cash available to the Partnership as of 17 November 2025 (including the cash held in the Partnership's bank accounts, as well as cash being held on behalf of the Partnership by third parties)

4. As at 17 November 2025, the Partnership held US\$21,458,686.33 in its account with Banc of California, and US\$2.23 in a JP Morgan investment account.

b. Documents verifying the above information (e.g. bank statements)

5. Having been informed of the account balances and banks holding the cash available to the Partnership, the provision of bank statements to your client is unnecessary.

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c. An explanation of what additional capital any of the Fund's portfolio companies have received from third parties (including, but not limited to, an update on the transactions involving Replicate, Aulos, and Ascidian described in paragraph 46 of your letter of 8 September 2025)

6. In the period from our second letter dated 8 September 2025 to the present, the Partnership's portfolio companies have received (or in certain cases, will receive) the following from third parties:
- (a) Ascidian – on 21 October 2025, Ascidian received US\$6,000,000 from Roche for the achievement of LI Go Milestones on programs 1, 2 and 3 pursuant to the previously announced June 2025 Collaboration Agreement with Roche covering Ascidian's exon editing platform;
 - (b) Aulos – on 5 September 2025, Aulos received US\$6,639,824 from a pool of unrelated investors as a second tranche of payments due to Aulos pursuant to a convertible note purchase agreement signed 7 August 2025 as described in our second letter dated 8 September 2025. The first tranche payments totalling US\$2,787,608 had been previously received in August 2025;
 - (c) Marengo – on or around 31 December 2025, Marengo is due to receive an initiating payment of US\$18,000,000 under a collaboration agreement with Menarini dated 21 November 2025 for the development of its TriSTAR0705 platform for cancer patients;
 - (d) Nine Square – on or before 5 December 2025, it is anticipated that Nine Square will receive US\$215,6491 as the first tranche of a four-tranche grant from the Michael J Fox Foundation totalling US\$865,964. The grant is in support of and to conduct the TRPML1 in-vivo efficacy research project
 - (e) Red Queen – on 14 November 2025, Red Queen deposited a US\$13,500 cheque dated 14 October 2025 through the R&D tax credit for increasing research activity program offered by the United States Government; and
 - (f) Replicate:
 - (i) on 19 September 2025, Replicate received US\$6,500,000 from Novo Nordisk. This is in respect of the Collaboration and License Agreement closed on 26 August 2025 described in our second letter dated 8 September 2025, and it is the same payment of US\$6,500,000 described in that letter;
 - (ii) on or around 3 December 2025, it is anticipated Replicate will receive US\$2,500,000 as first tranche funding from two grants through the Gates Foundation. The first grant is in support of the development of an RNA-based HIV vaccine to total US\$3,500,000 up to 2027, and the

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second grant is in support of the development of a low-dose, multigenic RNA-based malaria vaccine to total US\$3,400,000 up to 2027; and

- (iii) in January 2026, Replicate is estimated to receive US\$1,000,000 as up-front payment in relation to a license and development deal with Instituto Butantan dated 13 November 2025 for the development and commercialisation of its RBI-4000 rabies vaccine in Latin America.

- 7. We trust the above fully answers your clients' questions and brings this needless line of enquiry to a close.

Yours faithfully

Walkers (Cayman) LLP

WALKERS (CAYMAN) LLP

EXHIBIT Z

From: Rebecca Moseley <Rebecca.Moseley@walkersglobal.com>
Sent: Wednesday, December 10, 2025 10:52 AM
To: Lauren Wood; FSD Registry
Cc: Walkers-ATP; Rigmora
Subject: FSD 146 of 2025 (JAJ) - Unicorn Biotech Ventures One Ltd and Anor. v ATP III GP Ltd and FSD 151 of 2025 (JAJ) - In the Matter of ATP Life Science Ventures L.P. [WALKERS-AMER_DOCS.FID559398]
Attachments: 2025.12.10 - Letter from Walkers to Campbells (Chapter 11).pdf

EXTERNAL EMAIL: This email originated from outside of Campbells.



Dear Ms Wood

FSD 146 of 2025 (JAJ) – Unicorn Biotech Ventures One Ltd and Anor. v ATP III GP Ltd (the "Writ Proceedings")
FSD 151 of 2025 (JAJ) – In the Matter of ATP Life Science Ventures L.P. (the "Petition Proceedings")

We would be most grateful if you could please bring this email and the **attached** letter to the attention of the Learned Justice Asif at your earliest convenience.

As the letter confirms, yesterday afternoon our clients ATP Life Science Ventures, L.P. (acting by its GP) and ATP III GP, Ltd., along with Apple Tree Life Sciences, Inc., commenced Chapter 11 cases in the United States Bankruptcy Court for the District of Delaware. We wanted the Court to be made aware of those developments as soon as possible.

Those filings bring into effect the automatic stay provided for in 11 U.S.C. § 362(a). That stay applies to the commencement or continuation of any proceedings against each debtor anywhere in the world. In those circumstances, the above-captioned Writ Proceedings and Petition Proceedings are both subject to the automatic stay.

We will liaise separately with Campbells regarding both the automatic stay and the orderly approach to vacating the upcoming PTR and trial dates. We will update the Court as soon as we can.

Kind regards

Rebecca

Rebecca Moseley
Associate
Walkers (Cayman) LLP

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Singapore

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BY EMAIL

10 December 2025

Our Ref: JG/SW/RB/197133

Campbells LLP
Floor 4, Willow House
Cricket Square
Grand Cayman KY1-9010
Cayman Islands

Attention: Liam Faulkner, Hugo Farmer and Jordie Fienberg

Dear Campbells

**UNICORN BIOTECH VENTURES ONE LTD (IN ITS CAPACITY AS GENERAL PARTNER OF RIGMORA BIOTECH INVESTOR ONE LP) AND UNICORN BIOTECH VENTURES TWO LTD (IN ITS CAPACITY AS GENERAL PARTNER OF RIGMORA BIOTECH INVESTOR TWO LP) V ATP III GP, LTD (IN ITS CAPACITY AS GENERAL PARTNER OF ATP LIFE SCIENCE VENTURES, L.P.)
CAUSE NO. FSD 146 OF 2025 (JAJ) (The Writ Proceedings)**

**IN THE MATTER OF ATP LIFE SCIENCE VENTURES, L.P.
CAUSE NO. FSD 151 OF 2025 (JAJ) (The Petition Proceedings)**

1. We write regarding the above-captioned proceedings.

Chapter 11 Filings in Delaware

2. We write to confirm that, as you have likely been informed by your clients' Delaware attorneys, yesterday afternoon our clients ATP Life Science Ventures, L.P. (acting by its GP) and ATP III GP, Ltd., along with Apple Tree Life Sciences, Inc., commenced Chapter 11 cases in the United States Bankruptcy Court for the District of Delaware.
3. Those filings bring into effect the automatic stay provided for in 11 U.S.C. § 362(a). That stay applies to the commencement or continuation of any proceedings against each debtor, and the exercise of control over the property of each debtor, anywhere in the world
4. In those circumstances, the Writ Proceedings and the Petition Proceedings are both subject to the automatic stay and no further steps are to be taken in respect of either of them while the Chapter 11 Proceedings are on foot.
5. We wish to inform both you and the Court of these developments immediately in light of the effect that they will have on the Writ Proceedings and the Petition Proceedings, and to ensure that no further unnecessary costs or time are expended by any of the parties or the Court on those proceedings.

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6. We will also now write to the Court with a copy of this letter, both to ensure that the Learned Judge is also aware of the developments and to confirm that we will liaise with you under separate cover regarding the agreement of a consent order noting the stay and vacating the 17 December hearing and the January trial.
7. We will write shortly with draft orders for your comments.
8. We hope that our clients can work together to assist the US Bankruptcy Court of Delaware to ensure that a restructuring is achieved that will ensure the best outcome for all parties concerned.

Yours faithfully

Walkers (Cayman) LLP

WALKERS (CAYMAN) LLP

cc Ms Lauren Wood, Secretary to Justice Asif