

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

Apple Tree Life Sciences, Inc., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-12177 (LSS)

(Joint Administration Requested)

**AMENDED<sup>2</sup> NOTICE OF (I) FILING OF BANKRUPTCY PETITIONS AND  
RELATED DOCUMENTS AND (II) AGENDA FOR HEARING ON FIRST DAY  
MOTIONS SCHEDULED FOR DECEMBER 17, 2025 AT 3:30 P.M. (ET)<sup>3</sup>**

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

**Please refer to Judge Silverstein's Chambers Procedures (<https://www.deb.uscourts.gov/chief-judge-laurie-selber-silverstein>) and the Court's website (<http://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 12:00 p.m. (ET) on December 17, 2025, unless otherwise noticed using the *eCourtAppearances* tool available on the Court's website.**

**PLEASE TAKE NOTICE** that on December 9, 2025, and December 15, 2025, the above-captioned debtors and debtors in possession (the "Debtors") filed the following voluntarily petitions (the "Petitions") for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532:

<sup>1</sup> 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); and Red Queen Therapeutics, Inc. (8563). The location of the Debtors' service address in these chapter 11 cases is 230 Park Avenue, Suite 2800, New York, NY 10169.

<sup>2</sup> **Amended items appear in bold.**

<sup>3</sup> All motions and other pleadings referenced herein are available online at the following address: <http://veritaglobal.net/AppleTree>.



A. Voluntary Petitions:

1. Apple Tree Life Sciences, Inc. [[Case No. 25-12177](#)]
2. ATP Life Science Ventures, L.P. [[Case No. 25-12178](#)]
3. ATP III GP, Ltd. [[Case No. 25-12179](#)]
4. Apertor Pharmaceuticals, Inc. [Case No. [25-12201](#)]
5. Initial Therapeutics, Inc. [Case No. [25-12202](#)]
6. Marlinspike Therapeutics, Inc. [Case No. [25-12203](#)]
7. Red Queen Therapeutics, Inc. [Case No. [25-12204](#)]

**PLEASE TAKE FURTHER NOTICE** that in addition to the filing of the Petitions, the Debtors filed the following first day motions and related pleadings (collectively, the “First Day Motions”).

B. First Day Motions:

8. Debtors’ Motion for an Order Directing Joint Administration of Chapter 11 Cases [[Docket No. 16](#) – filed December 15, 2025]
  - A. **Notice of Filing of Revised Proposed Order Directing Joint Administration of the Debtors’ Chapter 11 Cases** [[Docket No. 50](#) – filed December 16, 2025]
9. Debtors’ Motion for Entry of an Order (I) Authorizing Redaction of Certain Personally Identifiable Information Within the Consolidated List of Creditors and Other Filings and (II) Granting Related Relief [[Docket No. 21](#) – filed December 15, 2025]
  - A. **Notice of Filing of Revised Proposed Order (I) Authorizing Redaction of Certain Personally Identifiable Information in the Consolidated List of Creditors and Other Filings and (II) Granting Related Relief** [[Docket No. 51](#) – filed December 16, 2025]

10. Debtors' Application for Entry of an Order (I) Approving the Retention and Employment of Kurtzman Carson Consultants, LLC dba Verita Global as the Claims and Noticing Agent to the Debtors and (II) Granting Related Relief [[Docket No. 22](#) – filed December 15, 2025]
  - A. **Notice of Filing of Revised Proposed Order (I) Approving the Retention and Employment of Kurtzman Carson Consultants, LLC dba Verita Global as the Claims and Noticing Agent to the Debtors and (II) Granting Related Relief** [[Docket No. 52](#) – filed December 16, 2025]
11. Debtors' Motion for Entry of Interim and Final Orders to (I) Continue Employee Benefits Programs and (II) Granting Related Relief [[Docket No. 23](#) – filed December 15, 2025]
  - A. **Notice of Filing of Revised Proposed Interim Order Authorizing the Debtors to (I) Continue Employee Benefits Programs and (II) Granting Related Relief** [[Docket No. 56](#) – filed December 17, 2025]
  - B. **Omnibus Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Cash Management Motion and Wages Motion** [[Docket No. 61](#) – filed December 17, 2025]
12. Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Pre-Petition Obligations Related Thereto, and (C) Continue to Perform Intercompany Transactions, (II) Granting Administrative Expense Status to Post-Petition Intercompany Balances, and (III) Granting Related Relief [[Docket No. 24](#) – filed December 15, 2025]
  - A. **Notice of Filing of Revised Proposed Interim Order (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Pre-Petition Obligations Related Thereto, and (C) Continue to Perform Intercompany Transactions, (II) Granting Administrative Expense Status to Post-Petition Intercompany Balances, and (III) Granting Related Relief** [[Docket No. 57](#) – filed December 17, 2025]
  - B. **Omnibus Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Cash Management Motion and Wages Motion** [[Docket No. 61](#) – filed December 17, 2025]

C. First Day Declarations:

13. Declaration of Dr. Seth L. Harrison in Support of Chapter 11 Petitions and First Day Motions [[Docket No. 18](#) – filed December 15, 2025]
14. Declaration of Perry M. Mandarin, Chief Restructuring Officer of the Debtors, in Support of Chapter 11 Petitions and First Day Motions [[Docket No. 25](#) – filed December 15, 2025]

A. **Supplemental Declaration of Perry M. Mandarin, Chief Restructuring Officer of the Debtors, in Support of Chapter 11 Petitions and First Day Motions** [[Docket No. 63](#) – filed December 17, 2025]

D. Related Pleadings:

15. **Notice of Preliminary Live Transcript Regarding December 17, 2025 Pre-Trial Review Hearing in the Grand Court of the Cayman Islands Financial Services Division** [[Docket No. 62](#) – filed December 17, 2025]

**PLEASE TAKE FURTHER NOTICE** that an in-person hearing with respect to the Petitions and First Day Motions is scheduled for **December 17, 2025 at 3:30 p.m. (ET)** (the “First Day Hearing”) at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom No. 2, Wilmington, Delaware 19801 before the Honorable Laurie Selber Silverstein, United States Bankruptcy Judge for the District of Delaware. Parties who wish to participate in the First Day Hearing may do so by (i) reviewing Judge Silverstein’s Chambers Procedures regarding expectations of remote participants (<https://www.deb.uscourts.gov/chief-judge-laurie-selber-silverstein>), (ii) reviewing the Court’s website for information on who may participate remotely, the method of allowed participation (video or audio), and the advance registration requirements, and (iii) if permitted to appear remotely, by registering using the Court’s *eCourtAppearances* tool at <http://www.deb.uscourts.gov/ecourt-appearances> found on the Court’s website. Registration is required by 12:00 p.m. (ET) on December 17, 2025, unless otherwise noticed.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the First Day Motions may be made at the First Day Hearing.

Dated: December **17**, 2025  
Wilmington, Delaware

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Respectfully submitted,

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