

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)

(Jointly Administered)

Re: Docket No. 24

**CERTIFICATION OF COUNSEL REGARDING ORDER  
AUTHORIZING THE DEBTORS TO OPEN NEW SEGREGATED BANK ACCOUNT**

The undersigned hereby certifies as follows:

1. On December 15, 2025, the above-captioned debtors and debtors in possession (the “Debtors”) filed the *Debtors’ Motion Seeking Entry of Interim and Final Orders (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. 24] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. On December 17, 2025, Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP (collectively, “Rigmora”) filed a formal objection to the interim relief sought in the Motion [Docket No. 61] (the “Rigmora Objection”).

3. On December 17, 2025 at 3:30 p.m. (ET), the Court held a hearing (the “First Day Hearing”) to consider the interim approval of the Motion and the Rigmora Objection. Consistent

<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.



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with the discussion on the record of the First Day Hearing regarding Debtor ATP Life Science Ventures, L.P.'s urgent need to open a segregated bank account, the Debtors have prepared a form of order, attached hereto as **Exhibit A** (the "Order"), authorizing such relief. The Order has been circulated to the Office of the United States Trustee for the District of Delaware and Rigmora who do not object to its entry.

WHEREFORE, the Debtors respectfully request that the Order authorizing Debtor ATP Life Science Ventures, L.P. to open a segregated bank account, attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

*[Remainder of Page Intentionally Left Blank]*

Dated: December 19, 2025  
Wilmington, Delaware

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Respectfully submitted,

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*Proposed Counsel to the Debtors and Debtors in Possession*

**EXHIBIT A**

**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)

(Jointly Administered)

**Re: Docket No. 24**

**ORDER AUTHORIZING THE DEBTORS TO OPEN  
NEW SEGREGATED BANK ACCOUNT**

Upon the motion (the “Motion”)<sup>2</sup> of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for entry of an 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; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, entered February 29, 2012; and that the Debtors consent to entry of a final order; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and a hearing having been held to consider the relief requested in the Motion and upon the record of the hearing and all of

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<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor;

**IT IS HEREBY ORDERED THAT:**

1. The Debtors are directed to immediately open a new segregated bank account for Debtor ATP Life Science Ventures, L.P. (the “Fund”) which shall be used to hold the \$96,960,925.88 to be paid by the Rigmora LPs in accordance with the Partial Final Judgment and Order of the Delaware Court of Chancery dated December 11, 2025. The Debtors shall immediately provide notice of such new segregated bank account, together with wiring instructions, to the Rigmora LPs. The segregated bank account shall only be opened at a bank that is a party to a Uniform Depository Agreement with the Office of the United States Trustee.

2. Any funds deposited in this segregated bank account shall not be withdrawn or otherwise used or encumbered pending further order of this Court.

3. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order.

4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.