

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Apple Tree Life Sciences, Inc., <i>et al.</i> , <sup>1</sup>	Case No. 25-12177 (LSS)
Debtors.	(Jointly Administered)
	Hearing Date: February 19, 2026 at 10:00 a.m. (ET) Obj. Deadline: February 12, 2026 at 4:00 p.m. (ET)

**DEBTORS' SECOND MOTION FOR ENTRY OF AN  
ORDER (I) EXTENDING TIME TO FILE SCHEDULES OF ASSETS AND  
LIABILITIES, SCHEDULES OF CURRENT INCOME AND EXPENDITURES,  
SCHEDULES OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES, AND  
STATEMENTS OF FINANCIAL AFFAIRS AND (II) GRANTING RELATED RELIEF**

The above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) respectfully state the following in support of this motion (this “Motion”):

**RELIEF REQUESTED**

1. The Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), (a) extending the deadline by which Debtors Apertor Pharmaceuticals, Inc.; Initial Therapeutics, Inc.; Marlinspike Therapeutics, Inc.; Red Queen Therapeutics, Inc.; Evercrisp Biosciences, Inc.; Nine Square Therapeutics, Inc.; and Nereid Therapeutics Incorporated (collectively, the “Portfolio Debtors”), must file their schedules of assets and liabilities, schedules of current income and expenditures, schedules of executory contracts and unexpired leases, and statements of financial affairs (the “Schedules and Statements”), as required by section 521 of title 11 of the United States Code (the “Bankruptcy”

<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); 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.



Code”) and rule 1007 of Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), by thirty (30) days, through and including March 2, 2026,<sup>2</sup> without prejudice to the Portfolio Debtors’ rights to seek further extensions of this deadline and (b) granting related relief.

### **JURISDICTION AND VENUE**

2. The United States Bankruptcy Court for the District of Delaware (this “Court”) has 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.

3. Pursuant to rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the Debtors confirm their consent to the Court entering a final order in connection with this Motion 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.

4. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

5. The statutory bases for the relief requested herein are sections 105(a) and 521 of the Bankruptcy Code, Bankruptcy Rules 1007(c) and 9006(b), and Local Rules 1007-1(a) and 9006-2.

### **BACKGROUND**

6. On December 9 and 15, 2025 and January 1 and 15, 2026 (the “Petition Dates”), each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code

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<sup>2</sup> Thirty (30) days from January 30, 2026 is Sunday, March 1, 2026. By operation of Bankruptcy Rule 9006(a), the deadline would be extended to the next business day, which is Monday, March 2, 2026.

(the “Chapter 11 Cases”). These Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b). *See* Docket Nos. 69, 178 & 200.

7. The Debtors are operating their business and managing their property as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No request for the appointment of a trustee or examiner has been made in these Chapter 11 Cases.

8. On January 20, 2026, the Office of the United States Trustee for the District of Delaware appointed an Official Committee of Unsecured Creditors (the “Committee”) for these Chapter 11 Cases. *See* Docket No.194.

9. A detailed description of the facts and circumstances of these Chapter 11 Cases is set forth in the *Declaration of Dr. Seth L. Harrison in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 18] (the “Harrison Declaration”) and the *Declaration of Perry M. Mandarino, Chief Restructuring Officer of the Debtors, in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 25] (the “Mandarino Declaration,” and with the Harrison Declaration, the “First Day Declarations”).<sup>3</sup> As is described in more detail in the First Day Declarations, the Debtors commenced these Chapter 11 Cases due to the failure of Rigmora Biotech Investor One LP, and Rigmora Biotech Investor Two LP (collectively, “Rigmora”) to fulfill their contractual obligations, and their attempts to wind up Debtor ATP Life Science Ventures, L.P. (the “Partnership Debtor”) and liquidate the portfolio companies. Through these Chapter 11 Cases, the Debtors seek to stabilize their business, and, under the Court’s supervision, restructure the Partnership Debtor’s capital structure.

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<sup>3</sup> Capitalized terms not defined herein shall have the meanings ascribed to such terms in the First Day Declarations, as applicable.

**BASIS FOR RELIEF**

**I. Cause Exists to Extend the Time to File the Schedules and Statements.**

10. Bankruptcy Rule 1007(c) requires a chapter 11 debtor to file its Schedules and Statements within fourteen days of the debtor’s petition date. Local Rule 1007-1(a) extends this time by an additional fourteen days for debtors with more than 200 creditors. Pursuant to an order entered by the Court on January 20, 2026, the Debtors’ Schedules and Statements are currently required to be filed by January 30, 2026, as applicable to each particular Debtor (the “Schedule Deadline”) [Docket No. 179]. Notwithstanding the current Schedule Deadline, Bankruptcy Rules 1007(c) and 9006(b) and Local Rule 1007-1(a) permit the Court to expand a debtor’s time to file Schedules and Statements “for cause shown.”

11. The Debtors submit that cause exists to further extend the Schedule Deadline for the Portfolio Debtors through and including March 2, 2026<sup>4</sup> based upon, among other things, the numerous burdens imposed on the Portfolio Debtors’ management and professionals by the Portfolio Debtors’ restructuring, particularly in the early days and weeks of these Chapter 11 Cases. This is particularly true in these free-fall Chapter 11 Cases, whose heavy litigation burden has demanded the constant attention of the Portfolio Debtors’ management and professionals. To complete the Schedules and Statements, the Portfolio Debtors’ management, which consists of a limited number of people, must collect, review, and assemble substantial amounts of information. The information to be gathered and sorted through is voluminous and will require significant time from the Portfolio Debtors’ management and professionals. The Debtors submit that these burdens support an extension of the Schedule Deadline for the Portfolio Debtors.

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<sup>4</sup> Pursuant to Local Rule 9006-2, the filing of this Motion operates to extend the Portfolio Debtors’ Schedule Deadline until the Court acts on this Motion.

12. The Debtors further submit that the relief requested herein will not prejudice or adversely affect the rights of the Portfolio Debtors' creditors or other parties in interest. Rather, the Debtors believe that the requested extension will aid the Portfolio Debtors in providing accurate and complete Schedules and Statements to the benefit of these Chapter 11 Cases. However, recognizing the importance of the Schedules and Statements, the Portfolio Debtors intend to complete the Schedules and Statements as quickly as practicable and, if possible, prior to the extended Schedule Deadline.

13. Accordingly, the Debtors respectfully request entry of the Proposed Order extending the Portfolio Debtors' Schedule Deadline by thirty (30) days, through and including March 2, 2026, without prejudice to the Debtors' rights to seek further extensions of the Schedule Deadline for the Portfolio Debtors upon a showing of cause as required by Bankruptcy Rule 1007 and Local Rule 1007-1(a).

**NOTICE**

14. The Debtors will provide notice of this Motion to the following parties or their respective counsel: (a) the United States Trustee for the District of Delaware; (b) the Committee; (c) the United States Attorney's Office for the District of Delaware; (d) the Internal Revenue Service; (e) the offices of the attorneys general in the states in which the Debtors operate; and (f) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

**NO PRIOR REQUEST**

15. No prior request for the relief sought in this Motion has been made to this or any other court.

**CONCLUSION**

**WHEREFORE**, the Debtors respectfully request entry of the Proposed Order, substantially in the form attached hereto as **Exhibit A**, (a) granting the relief requested herein and (b) granting such other relief as the Court deems appropriate under the circumstances.

*[Signature Page Follows]*

Dated: January 30, 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*)  
Alain Jaquet, Esq. (admitted *pro hac vice*)  
Rachel Harrington, Esq. (admitted *pro hac vice*)  
**QUINN EMANUEL URQUHART  
& SULLIVAN, LLP**  
295 5<sup>th</sup> Avenue, 9<sup>th</sup> Floor  
New York, New York 10016  
Telephone: (212) 849-7000  
Facsimile: (212) 849-7100  
Email: andrewberdon@quinnemanuel.com  
pattytomasco@quinnemanuel.com  
rachelepstein@quinnemanuel.com  
alainjaquet@quinnemanuel.com  
rachelharrington@quinnemanuel.com

-and-

Eric D. Winston, Esq. (admitted *pro hac vice*)  
Razmig Izakelian, Esq. (admitted *pro hac vice*)  
Benjamin Roth, Esq. (admitted *pro hac vice*)  
**QUINN EMANUEL URQUHART  
& SULLIVAN, LLP**  
865 S. Figueroa Street, 10<sup>th</sup> Floor  
Los Angeles, California 90017  
Telephone: (213) 443-3000  
Facsimile: (213) 443-3100  
Email: ericwinston@quinnemanuel.com  
razmigizakelian@quinnemanuel.com  
benroth@quinnemanuel.com

Respectfully submitted,

/s/ Brett M. Haywood

L. Katherine Good (No. 5101)  
Brett M. Haywood (No. 6166)  
Shannon A. Forshay (No. 7293)  
Ethan H. Sulik (No. 7270)  
**POTTER ANDERSON & CORROON LLP**  
1313 N. Market Street, 6th Floor  
Wilmington, Delaware 19801  
Telephone: (302) 984-6000  
Facsimile: (302) 658-1192  
Email: kgood@potteranderson.com  
bhaywood@potteranderson.com  
sforshay@potteranderson.com  
esulik@potteranderson.com

*Proposed Counsel to the Debtors and Debtors in Possession*

**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)

Hearing Date: February 19, 2026 at 10:00 a.m. (ET)

Objection Deadline: February 12, 2026 at 4:00 p.m. (ET)

**NOTICE OF DEBTORS' SECOND MOTION FOR ENTRY OF AN  
ORDER (I) EXTENDING TIME TO FILE SCHEDULES OF ASSETS AND  
LIABILITIES, SCHEDULES OF CURRENT INCOME AND EXPENDITURES,  
SCHEDULES OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES, AND  
STATEMENTS OF FINANCIAL AFFAIRS AND (II) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE** that the above-captioned debtors and debtors in possession (the "Debtors"), filed the *Debtors' Second Motion for Entry of an Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, and Statements of Financial Affairs and (II) Granting Related Relief* (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court").

**PLEASE TAKE FURTHER NOTICE** that objections to the Motion, if any, must be in writing, filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 3<sup>rd</sup> Floor, 824 N. Market Street, Wilmington, Delaware 19801, on or before **February 12, 2026**

<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); 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.

**at 4:00 p.m. (ET)** (the “Objection Deadline”), and served upon and received by the undersigned proposed counsel for the Debtors.

**PLEASE TAKE FURTHER NOTICE** that, if any objections to the Motion are received, the Motion and such objections shall be considered at a hearing before the Honorable Laurie Selber Silverstein at the Bankruptcy Court, 824 N. Market Street, 6th Floor, Courtroom No. 2, Wilmington, Delaware 19801 on **February 19, 2026 at 10:00 a.m. (ET)**.

**IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

*[Remainder of Page Intentionally Left Blank]*

Dated: January 30, 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*)  
Alain Jaquet, Esq. (admitted *pro hac vice*)  
Rachel Harrington, Esq. (admitted *pro hac vice*)  
**QUINN EMANUEL URQUHART  
& SULLIVAN, LLP**  
295 5<sup>th</sup> Avenue, 9<sup>th</sup> Floor  
New York, New York 10016  
Telephone: (212) 849-7000  
Facsimile: (212) 849-7100  
Email: andrewberdon@quinnemanuel.com  
pattytomasco@quinnemanuel.com  
rachelepstein@quinnemanuel.com  
alainjaquet@quinnemanuel.com  
rachelharrington@quinnemanuel.com

-and-

Eric D. Winston, Esq. (admitted *pro hac vice*)  
Razmig Izakelian, Esq. (admitted *pro hac vice*)  
Benjamin Roth, Esq. (admitted *pro hac vice*)  
**QUINN EMANUEL URQUHART  
& SULLIVAN, LLP**  
865 S. Figueroa Street, 10<sup>th</sup> Floor  
Los Angeles, California 90017  
Telephone: (213) 443-3000  
Facsimile: (213) 443-3100  
Email: ericwinston@quinnemanuel.com  
razmigizakelian@quinnemanuel.com  
benroth@quinnemanuel.com

Respectfully submitted,

*/s/ Brett M. Haywood*

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L. Katherine Good (No. 5101)  
Brett M. Haywood (No. 6166)  
Shannon A. Forshay (No. 7293)  
Ethan H. Sulik (No. 7270)  
**POTTER ANDERSON & CORROON LLP**  
1313 N. Market Street, 6th Floor  
Wilmington, Delaware 19801  
Telephone: (302) 984-6000  
Facsimile: (302) 658-1192  
Email: kgood@potteranderson.com  
bhaywood@potteranderson.com  
sforshay@potteranderson.com  
esulik@potteranderson.com

*Proposed Counsel to the Debtors and Debtors in Possession*

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  Apple Tree Life Sciences, Inc., <i>et al.</i> , <sup>1</sup>  Debtors.	Chapter 11  Case No. 25-12177 (LSS)  (Jointly Administered)  Re: Docket No. ____
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**SECOND ORDER (I) EXTENDING TIME TO FILE SCHEDULES OF ASSETS AND LIABILITIES, SCHEDULES OF CURRENT INCOME AND EXPENDITURES, SCHEDULES OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES, AND STATEMENTS OF FINANCIAL AFFAIRS AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)<sup>2</sup> of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for the entry of an order (this “Order”), (a) extending the time period for the Portfolio Debtors to file their Schedules and Statements and (b) granting related relief, all as more fully set forth in the Motion; and upon the First Day Declarations; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 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 the Debtors having consented 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 Court having found that the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and this Court

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<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); 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.

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

having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing, if any, before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor;

**IT IS HEREBY ORDERED THAT**

1. The Motion is granted as set forth herein.
2. Any objections to the entry of this Order, to the extent not withdrawn or settled, are overruled.
3. The Portfolio Debtors' Schedule Deadline is extended through and including March 2, 2026. Such extension is without prejudice to the Debtors' right to seek further extensions.
4. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).
5. Notice of the Motion as provided therein shall be deemed good and sufficient notice of the Motion, and the requirements of the Bankruptcy Rules and the Local Rules are satisfied by such notice.
6. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

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