

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

In re:

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

Chapter 11

Case No. 25-12177 (LSS)

(Jointly Administered)

**Hearing Date:** February 25, 2026 at 10:00 a.m. (ET)

**Objection Deadline:** February 18, 2026 at 4:00 p.m. (ET)

**APPLICATION FOR AN ORDER PURSUANT TO 11 U.S.C. §§ 328(a)  
AND 1103 AUTHORIZING AND APPROVING THE RETENTION AND  
EMPLOYMENT OF COLE SCHOTZ P.C. AS COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF JANUARY 23, 2026**

The Official Committee of Unsecured Creditors (the “Committee”) of Apple Tree Life Sciences, Inc., *et al.* (collectively, the “Debtors”) in the above-captioned jointly administered chapter 11 cases (the “Chapter 11 Cases”) hereby files this application (the “Application”) for entry of an order, pursuant to sections 328(a) and 1103 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), authorizing the Committee to retain and employ Cole Schotz P.C. (“Cole Schotz”) as counsel to the Committee effective as of January 23, 2026. In support of the Application, the Committee submits (i) the declaration of Justin R. Alberto attached hereto as **Exhibit A** (the “Alberto Declaration”) and (ii) the declaration of Michael B. Dilling, not in his individual capacity but solely as Chairperson of the Committee,

<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); and Nine Square Therapeutics, Inc. (4503). The location of the Debtors’ service address in these chapter 11 cases is 230 Park Avenue, Suite 2800, New York, NY 10169.



attached hereto as **Exhibit B** (the “Committee Declaration”), and respectfully represents as follows:

**JURISDICTION AND VENUE**

1. The United States District Court for the District of Delaware has jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the United States Bankruptcy Court for the District of Delaware (the “Court”) under 28 U.S.C. § 157 and the *Amended Standing Order of Reference for the United States District Court for the District of Delaware*, dated February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b).

2. Pursuant to Local Rule 9013-1(f), the Committee consents to the entry of a final order or judgment by the Court in connection with this Application 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.

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

4. The statutory and other bases for relief requested in this Application are sections 328(a) and 1103 of the Bankruptcy Code, Bankruptcy Rule 2014 and Local Rule 2014-1.

**BACKGROUND**

5. On December 9 and 15, 2025 (the “Petition Date”),<sup>2</sup> each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. These Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b). Since the Petition Date, the Debtors have remained in possession of their assets and have continued to operate and manage their business as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

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<sup>2</sup> Additional Debtor entities filed voluntary petitions on January 1 and 15, 2026.

6. On January 20, 2026, the Office of the United States Trustee for Region 3 (the “U.S. Trustee”) appointed a three-member Committee consisting of: (i) Fujifilm Cellular Dynamics Inc.; (ii) Global Project Partners, LLC; and (iii) Baylor College of Medicine.<sup>3</sup> Baylor College of Medicine serves as the chairperson of the Committee.

7. On January 23, 2026, the Committee selected Cole Schotz as its counsel and Dundon Advisers, LLC (“Dundon”) as its financial advisor.

**RELIEF REQUESTED**

8. By this Application, the Committee respectfully requests that the Court enter an order, pursuant to sections 328(a) and 1103 of the Bankruptcy Code, authorizing the Committee to retain and employ Cole Schotz as its counsel to represent the Committee in all phases of the Chapter 11 Cases effective as of January 23, 2026, which is the date Cole Schotz was selected as proposed counsel and commenced providing services on behalf of the Committee. Contemporaneously herewith, the Committee is filing an application to retain Dundon as financial advisor to the Committee.

**BASIS FOR RELIEF**

9. Pursuant to sections 328(a) and 1103 of the Bankruptcy Code, a committee appointed under section 1102 of the Bankruptcy Code may employ one or more attorneys to represent it in carrying out its duties under the Bankruptcy Code, provided that such attorneys are disinterested persons and do not hold or represent an interest adverse to the estate. 11 U.S.C. §§ 328(a), 1103. The Committee requests that the Court approve its retention of Cole Schotz as its counsel to perform certain legal services that will be necessary during the Chapter 11 Cases in accordance with Cole Schotz’s standard hourly rates and disbursement policies.

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<sup>3</sup> Docket No. 194.

10. The Committee selected Cole Schotz as its counsel because of the firm's extensive experience representing official committees in complex chapter 11 proceedings. Most recently, Cole Schotz has been engaged to represent committees in: *In re American Signature, Inc., et al*, Case No. 25-12105 (Bankr. D. Del.); *In re Claire's Holdings LLC*, Case No. 25-11454 (BLS) (Bankr. D. Del.); *In re Zen JV, LLC*, Case No. 25-11195 (JKS) (Bankr. D. Del.); *In re F21 Opco, LLC*, Case No. 25-10469 (MFW) (Bankr. D. Del.); *In re LL Flooring Holdings, Inc.*, Case No. 24-11680 (BLS) (Bankr. D. Del.); *In re Fisker, Inc.*, Case No. 24-11390 (TMH) (Bankr. D. Del.); *In re Project Sage Oldco, Inc.*, Case No. 24-10245 (JTD) (Bankr. D. Del.); *In re Cano Health, Inc.*, Case No. 24-10164 (KBO) (Bankr. D. Del.); *In re Restoration Forest Products Group, LLC*, Case No. 24-10120 (KBO) (Bankr. D. Del.); *In re MediaMath Holdings Inc.*, Case No. 23-10882 (LSS) (Bankr. D. Del.); *In re the Mitchell Gold Co., LLC*, Case No. 23-11385 (LSS) (Bankr. D. Del.); *In re FB Debt Financing Guarantor, LLC*, Case No. 23-10025 (KBO) (Bankr. D. Del.); *In re Performance Powersports Group Investor, LLC*, Case No. 23-10047 (LSS) (Bankr. D. Del.); and *In re Mallinckrodt plc*, Case No. 20-12522 (JTD) (Bankr. D. Del.). Several of the attorneys at Cole Schotz who will be employed in the Chapter 11 Cases are members in good standing of the Bar of the Supreme Court of Delaware and all regularly practice before this Court. Accordingly, the Committee seeks to retain Cole Schotz because Cole Schotz is well qualified to represent and assist the Committee in performing its duties in the Chapter 11 Cases.

**SERVICES TO BE PROVIDED BY COLE SCHOTZ**

11. The Committee respectfully submits that it is necessary and appropriate to employ and retain Cole Schotz as its counsel to represent it in the Chapter 11 Cases and render various professional services to enable it to faithfully execute its duties. Cole Schotz's duties may include, among others:

- a) serving as counsel to the Committee;
- b) providing legal advice with respect to the Committee's powers, rights, duties and obligations in the Chapter 11 Cases;
- c) assisting and advising the Committee in its consultations with the Debtors regarding the administration of the Chapter 11 Cases;
- d) assisting the Committee in reviewing and negotiating terms for unsecured creditors with respect to (i) debtor in possession financing and the use of cash collateral, (ii) sale of the Debtors' assets, including negotiating proposed asset purchase agreements, (iii) confirmation of a chapter 11 plan, and (iv) other requests for relief which would impact unsecured creditors;
- e) investigating liens, if any, and any related potential causes of action;
- f) advising the Committee on the corporate aspects of the Chapter 11 Cases and any plan(s) or other means to effect the Debtors' liquidation that may be proposed in connection therewith and participation in the formulation of any such plan(s) or means of implementing the liquidation, as necessary;
- g) taking all necessary actions to protect and preserve the estates of the Debtors for the benefit of unsecured creditors, including the investigation of the acts, conduct, assets, liabilities and financial condition of the Debtors, the investigation of the prior operation of the Debtors' business and the investigation and prosecution of estate claims, causes of action and any other matters relevant to the Chapter 11 Cases;
- h) preparing on behalf of the Committee, all necessary motions, applications, complaints, answers, orders, reports, papers and other pleadings and filings in connection with the Committee's duties in the Chapter 11 Cases;
- i) advising and representing the Committee in hearings and other judicial proceedings in connection with all necessary motions, applications, objections and other pleadings and otherwise protecting the interests of those represented by the Committee; and
- j) performing all other necessary legal services as may be required and authorized by the Committee that are in the best interests of unsecured creditors.

12. The Committee respectfully represents that it is necessary for the Committee to retain counsel to perform the above-referenced services and otherwise assist the Committee in

fulfilling its statutory duties under the Bankruptcy Code. Cole Schotz will perform the above tasks, as may be requested by the Committee, in a manner that avoids unnecessary duplication, promotes the efficient representation of the Committee and is consistent with the representation of the Committee as counsel.

**DISINTERESTEDNESS OF COLE SCHOTZ**

13. To the best of the Committee’s knowledge, information and belief and as evidenced by the Alberto Declaration, Cole Schotz does not currently hold or represent any interest adverse to the interest of the estates or creditors or equity security holders with respect to the matters in which Cole Schotz is to be employed, except as set forth therein, and Cole Schotz is “disinterested” under section 101(14) of the Bankruptcy Code.

14. Except as disclosed in the Alberto Declaration, Cole Schotz does not represent, and has not represented, any entities other than the Committee, in matters related to the Chapter 11 Cases. Cole Schotz may represent, or may have represented, certain parties with interests in the Chapter 11 Cases on matters unrelated to the Chapter 11 Cases. As set forth in the Alberto Declaration, Cole Schotz has conducted, and continues to conduct, research into its relations with the Debtors, the Debtors’ substantial creditors and other parties in interest in the Chapter 11 Cases.

**COMPENSATION OF COLE SCHOTZ**

15. The terms of the employment of Cole Schotz provide generally that certain attorneys and other personnel within Cole Schotz will undertake this representation at their standard hourly rates, and that Cole Schotz will be reimbursed for reasonable and necessary expenses, subject to approval of the Court in accordance with sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and the orders of this Court.

16. The present hourly rates for attorneys and paralegals of Cole Schotz are set forth in the Alberto Declaration. The hourly rates are subject to periodic adjustments to reflect economic

and other conditions and to reflect their increased expertise and experience in their area of law. Cole Schotz will advise the Committee, the Debtors and the U.S. Trustee of any increases in its hourly rates.<sup>4</sup>

17. Cole Schotz will also seek reimbursement for reasonable and necessary expenses incurred, which may include, among other things, travel expenses, work related meals, facsimile (outgoing only) toll and other charges, external teleconferencing, mail and express or overnight mail charges, special or hand delivery charges, document processing, photocopying (not to exceed \$0.10 per page for black and white copies and \$0.80 for color copies), scanning and printing charges, vendor charges, computerized research, transcription costs, filing fees, non-ordinary overhead expenses such as secretarial and other overtime and other out-of-pocket expenses incurred in providing professional services to the Committee. Cole Schotz will charge for these expenses in a manner and at rates consistent with charges made generally to its other clients.

**STATEMENT REGARDING U.S. TRUSTEE GUIDELINES**

18. Cole Schotz will file fee applications with the Court in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and orders of this Court, and be paid pursuant thereto. Cole Schotz also intends to make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013* (the "Revised UST Guidelines").

19. The following is provided in response Paragraph D.1. of the Revised UST Guidelines:

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<sup>4</sup> Such rate increases generally occur on or about September 1 of each year.

- Question** Did you agree to any variations from, or alternatives to, your standard or customary billing arrangements for this engagement?
- Response No. Cole Schotz professionals working on this matter will bill at their standard hourly rates.
- Question** Do any of the professionals included in this engagement vary their rate based on the geographic location of the bankruptcy case?
- Response No.
- Question** If you represented the client in the 12 months prepetition, disclose your billing rates and material financial terms for the prepetition engagement, including any adjustments during the 12 months prepetition. If your billing rates and material financial terms have changed postpetition, explain the difference and the reasons for the difference.
- Response Cole Schotz did not represent the Committee during the 12 months preceding the filing of the Chapter 11 Cases.
- Question** Has your client approved your prospective budget and staffing plan, and, if so for what budget period?
- Response Cole Schotz expects to develop a prospective budget and staffing plan to reasonably comply with the U.S. Trustee's request for information and additional disclosures, as to which Cole Schotz reserves all rights.

**NOTICE**

20. Notice of this Application will be provided to the following parties: (i) the U.S. Trustee; (ii) counsel to the Debtors; and (iii) those persons who have formally appeared in these Chapter 11 Cases and requested service pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Committee respectfully submits that no other or further notice of the Application is required.

**NO PRIOR REQUEST**

21. No prior request for the relief requested in this Application has been made to this Court or any other court.

**CONCLUSION**

**WHEREFORE**, the Committee respectfully requests that this Court enter an order, substantially in the form attached hereto as **Exhibit C**, authorizing and approving the Committee's retention and employment of Cole Schotz as its counsel effective as of January 23, 2026, and grant such other and further relief as the Court deems just and proper.

Dated: February 4, 2026

**THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS OF  
APPLE TREE LIFE SCIENCES,  
INC., *ET AL.***

*/s/ Michael B. Dilling* \_\_\_\_\_

Michael B. Dilling

On behalf of Baylor College of Medicine,  
Solely in his capacity as Chairperson of the  
Official Committee of Unsecured Creditors of  
Apple Tree Life Sciences, Inc., *et al.*

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

In re:

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

Chapter 11

Case No. 25-12177 (LSS)

(Jointly Administered)

**Hearing Date: February 25, 2026 at 10:00 a.m. (ET)**

**Objection Deadline: February 18, 2026 at 4:00 p.m. (ET)**

**NOTICE OF APPLICATION FOR AN  
ORDER PURSUANT TO 11 U.S.C. §§ 328(a) AND 1103  
AUTHORIZING AND APPROVING THE RETENTION AND  
EMPLOYMENT OF COLE SCHOTZ P.C. AS COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF JANUARY 23, 2026**

**PLEASE TAKE NOTICE** that on February 4, 2026, the Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Application for an Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 Authorizing and Approving the Retention and Employment of Cole Schotz P.C. as Counsel to the Official Committee of Unsecured Creditors Effective as of January 23, 2026* (the “Application”).

**PLEASE TAKE FURTHER NOTICE** that a hearing to consider the relief sought in the Application will be held on **February 25, 2026 at 10:00 a.m. (ET)** before The Honorable Laurie S. Silverstein, United States Bankruptcy Judge for the District of Delaware, at the United States

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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); and Nine Square Therapeutics, Inc. (4503). The location of the Debtors’ service address in these chapter 11 cases is 230 Park Avenue, Suite 2800, New York, NY 10169.

Bankruptcy Court, 6th Floor, Courtroom No. 2, 824 North Market Street, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the entry of an order granting the relief sought in the Application must be filed on or before **February 18, 2026 at 4:00 p.m. (ET) (the “Objection Deadline”)** with the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, you must serve a copy of the response or objection upon the undersigned proposed counsel to the Committee so as to be received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO PROPERLY FILE AND SERVE A RESPONSE ON OR BEFORE THE OBJECTION DEADLINE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.**

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Dated: February 4, 2026  
Wilmington, Delaware

**COLE SCHOTZ P.C.**

*/s/ Justin R. Alberto*

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Justin R. Alberto (No. 5126)

Patrick J. Reilley (No. 4451)

Jack M. Dougherty (No. 6784)

Carol E. Thompson (No. 6936)

500 Delaware Avenue, Suite 600

Wilmington, DE 19801

Telephone: (302) 652-3131

Facsimile: (302) 652-3117

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preilley@coleschotz.com

jdougherty@coleschotz.com

cthompson@coleschotz.com

*Proposed Counsel to the Official  
Committee of Unsecured Creditors*

**EXHIBIT A**

**Alberto Declaration**

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

In re:

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

Chapter 11

Case No. 25-12177 (LSS)

(Jointly Administered)

**DECLARATION OF  
JUSTIN R. ALBERTO IN SUPPORT OF APPLICATION  
FOR AN ORDER PURSUANT TO 11 U.S.C. §§ 328(a) AND  
1103 AUTHORIZING AND APPROVING THE RETENTION AND  
EMPLOYMENT OF COLE SCHOTZ P.C. AS COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF JANUARY 23, 2026**

I, Justin R. Alberto, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of the law firm of Cole Schotz P.C. ("Cole Schotz"), which maintains offices for the practice of law at 500 Delaware Avenue, Suite 600, Wilmington, Delaware. Cole Schotz also maintains offices in Boca Raton, Florida; Baltimore, Maryland; Dallas, Texas; Hackensack, New Jersey; Miami, Florida; New York, New York; and Washington D.C.

2. This declaration (the "Declaration") is submitted pursuant to sections 328(a) and 1103(b) of the Bankruptcy Code, Bankruptcy Rule 2014 and Local Rule 2014-1 and in support of the *Application of the Official Committee of Unsecured Creditors for an Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 Authorizing and Approving the Retention and Employment of Cole*

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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); and Nine Square Therapeutics, Inc. (4503). The location of the Debtors' service address in these chapter 11 cases is 230 Park Avenue, Suite 2800, New York, NY 10169.

*Schotz P.C. as Counsel to the Official Committee of Unsecured Creditors Effective as of January 23, 2026* (the “Application”).<sup>2</sup>

3. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein. To the extent that any information disclosed herein requires supplementation, amendment or modification upon Cole Schotz’s completion of further analysis or as additional information becomes available to it, a supplemental declaration will be filed with the Court.

**Cole Schotz’s Disinterestedness**

4. In connection with its proposed retention by the Committee in the Chapter 11 Cases, Cole Schotz researched its client database to determine whether it has relationships with any of the entities or persons that were identified to Cole Schotz as creditors or parties in interest in these Chapter 11 Cases (the “Interested Parties”), as set forth on **Schedule 1** attached hereto and incorporated herein (the “Interested Party List”). In addition, a list of the Interested Parties was sent via email to all employees of Cole Schotz for their individual review and response.

5. To the extent such a search indicated that Cole Schotz has, or previously had, a relationship with any of the Interested Parties within the last three (3) calendar years, the identities of such parties and Cole Schotz’s relationship with such parties are set forth on **Schedule 2** attached hereto. Further, each of the representations identified on **Schedule 2** are wholly unrelated to the Debtors and their Chapter 11 Cases.

6. Through its analysis, Cole Schotz determined that it has no connections with the Debtors, certain creditors of the Debtors, their respective attorneys, the U.S. Trustee or any person employed in the Office of the U.S. Trustee, Judges for the United States Bankruptcy Court for the

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

District of Delaware (and certain staff members) over the last three (3) calendar years, except as set forth herein or on **Schedule 2** attached hereto.

7. Further, as part of its diverse practice, Cole Schotz appears in numerous cases, proceedings and transactions involving many different professionals, including other attorneys, accountants, financial consultants and investment bankers, some of whom are or represent potential parties in interest in the Chapter 11 Cases. Cole Schotz does not, and will not, represent any such professional in the Chapter 11 Cases.

8. Based on the results of Cole Schotz's analysis, and except as otherwise disclosed herein, Cole Schotz does not hold or represent any interest adverse to the Committee, the Debtors or their estates.

9. To the best of my knowledge, information and belief after reasonable inquiry, Cole Schotz is disinterested within the meaning of section 101(14) of the Bankruptcy Code in that neither I, Cole Schotz nor any of its members, special counsel or associates:

- (a) are creditors, equity security holders or insiders of the Debtors;
- (b) are, or within two years before the Petition Date were, a director, officer or employee of the Debtors; or
- (c) have an interest materially adverse to the interest of the estates or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with or interest in the Debtors or for any other reason.

**Cole Schotz's Rates and Billing Practices**

10. Cole Schotz intends to apply for compensation for professional services rendered in connection with the Chapter 11 Cases subject to the approval of this Court and in compliance with applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Local Rules and orders of the Court entered in these Chapter 11 Cases concerning compensation of professionals, on an hourly basis, plus reimbursement of actual, necessary expenses and other charges incurred by Cole Schotz.

The attorneys and paralegals primarily responsible for representing the Committee and their current standard hourly rates are:

<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>
Justin R. Alberto	Member	\$1,150 per hour
Patrick J. Reilley	Member	\$1,000 per hour
Daniel J. Harris	Member	\$950 per hour
Jack M. Dougherty	Associate	\$650 per hour
Carol E. Thompson	Associate	\$505 per hour
Tejal R. Majethia	Associate	\$425 per hour
Larry S. Morton	Paralegal	\$420 per hour

11. In addition, other attorneys, paralegals and staff may be involved as necessary and appropriate to represent the Committee. The current rates of Cole Schotz members, special counsel, associates, paralegals and litigation support specialists are as follows:

<u>Professional</u>	<u>Rates</u>
Members	\$650.00 to \$1,800.00 per hour
Associates and Special Counsel	\$425.00 to \$950.00 per hour
Paralegals	\$330.00 to \$485.00 per hour
Litigation Support Specialists	\$460.00 to \$560.00 per hour

These rates are subject to change in accordance with Cole Schotz's billing practice and procedures. Cole Schotz will advise the Committee, the Debtors and the U.S. Trustee of any increases in its hourly rates.<sup>3</sup>

12. In addition, it is Cole Schotz's policy to charge its clients in all areas of practice for all other expenses incurred related to the representation. The expenses charged to clients include, among other things, facsimile (outgoing only) toll and other charges, external teleconferencing, mail and express mail charges, special or hand delivery charges, photocopying, scanning and printing charges, travel expenses, expenses for "working meals", computerized research,

<sup>3</sup> Cole Schotz generally increases its rates on or about September 1 of each year. These hourly rates are effective as of September 1, 2025.

transcription costs, as well as non-ordinary overhead expenses such as secretarial and other overtime. Cole Schotz will charge for these expenses in a manner and at rates consistent with charges made generally to its other clients.

13. No agreement exists, nor will any be made, between Cole Schotz and any other person regarding the sharing of compensation received by Cole Schotz for its services in these Chapter 11 Cases, as described in Bankruptcy Rule 2016.

**Attorney Statement Pursuant to Revised UST Guidelines**

14. Cole Schotz shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Chapter 11 Cases in compliance with sections 330 and 331 of the Bankruptcy Code and applicable provisions of the Bankruptcy Rules, Local Rules and any other applicable procedures and orders of the Court. Cole Schotz also intends to make a reasonable effort (taking into account the particular facts and circumstances of these cases) to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013* (the "Revised UST Guidelines"), both in connection with this Application and the interim and final fee applications to be filed by Cole Schotz in the Chapter 11 Cases. While Cole Schotz is agreeing to do so in these cases, this statement regarding the Revised UST Guidelines is made for this case only and with a full and express reservation of rights with respect to any other case(s) or matter(s).

15. The following is provided in response to the request for additional information set forth in Paragraph D.1. of the Revised UST Guidelines:

<b>Question</b>	Did you agree to any variations from, or alternatives to, your standard or customary billing arrangements for this engagement?
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- Response No. Cole Schotz professionals working on this matter will bill at their standard hourly rates.
- Question** Do any of the professionals included in this engagement vary their rate based on the geographic location of the bankruptcy case?
- Response No.
- Question** If you represented the client in the 12 months prepetition, disclose your billing rates and material financial terms for the prepetition engagement, including any adjustments during the 12 months prepetition. If your billing rates and material financial terms have changed postpetition, explain the difference and the reasons for the difference.
- Response Cole Schotz did not represent the Committee during the 12 months preceding the filing of the Chapter 11 Cases.
- Question** Has your client approved your prospective budget and staffing plan, and, if so for what budget period?
- Response Cole Schotz expects to develop a prospective budget and staffing plan to reasonably comply with the U.S. Trustee's request for information and additional disclosures, as to which Cole Schotz reserves all rights.

16. Cole Schotz, as proposed counsel to the Committee, will report directly to the Committee. During these Chapter 11 Cases, Cole Schotz will reasonably coordinate with Dundon regarding responsibilities and services rendered to the Committee to avoid any unnecessary duplication and inefficiencies.

I hereby declare under the penalty of perjury that the foregoing is true and correct.

Executed on February 4, 2026  
Wilmington, Delaware

/s/ Justin R. Alberto  
Justin R. Alberto

**SCHEDULE 1**

**List of Potential Parties in Interest**

**Debtors**

Apple Tree Life Sciences, Inc.  
ATP Life Science Ventures, L.P.  
ATP III GP, Ltd.  
Apertor Pharmaceuticals, Inc.  
Evercrisp Biosciences, Inc.  
Initial Therapeutics, Inc.  
Marlinspike Therapeutics, Inc.  
Nereid Therapeutics  
Nine Square Therapeutics, Inc.  
Red Queen Therapeutics, Inc.

**Banks**

Banc of California  
Citizens Bank  
Eastern Bank  
JP Morgan Chase Bank, N.A.  
Western Alliance Bank

**Vendors**

AAAS  
BioCentury, Inc.  
Boston Globe Life Science Media  
Canon  
Digital Science & Research Solutions, Inc.  
DirectUS  
Integration Appliance, Inc.  
Prendio LLC  
Private Plane Expenses

**Consultants**

Andrew Bayliffe  
Hughes and Hughes Bookkeeping  
Newfront Consulting  
Ollie Yuav

**Contract Counterparties**

1Password  
American Copy Machines  
BCL Search  
Citeline  
Directus Cloud  
EndPointsNews

Evaluate Ltd.  
Guidepoint Global, LLC  
Insperity  
Intapp  
Massachusetts Medical Society  
New England Journal of Medicine  
Nextiva  
Palmier Services Ltd.  
Science AAAS  
Sentient Jet  
Springer Nature  
Rockefeller University Press Journal of  
Experimental Medicine  
The New York Times

**Lessors**

Contemporary Information Company  
RXR HB Owner, LLC  
230 Park Avenue Holdco, LLC

**Utilities**

8x8  
Spectrum  
Verizon

**Insurance Providers**

Coalition Insurance Solutions, Inc.  
Continental Casualty Company  
Federal Insurance Company  
Houston Casualty Company  
National Union Fire Insurance Company of  
Pittsburgh, Pa  
Travelers Excess and Surplus Lines Company  
Westfield Insurance Company

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Joesph Yanchik  
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Loren Walensky  
Margaret Bigelow  
Mark Mitchnick  
Matthew Jacobson  
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Neena Kadaba  
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Spiros Liras  
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Brian Shoichet  
Christopher Rader  
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Edward Yoon  
Himani Bhalla  
Jerry Karabelas  
Jim Vaselli  
Kathy Fernando  
Leo Redmund  
Mace Rothbenberg  
Micheal Derkacz  
Micheal Ehlers

Micheal Wasserman  
Mikael Dolsten  
Nathaniel Wang  
Parinaz Aliahmad  
Patrick Kennedy  
Paul Da Silva Jardine  
Suraj Shah  
Todd Skacan  
Yanay Ofran  
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Elsberg Baker & Maruri PLLC  
Maples Group  
Marcum LLP (CBIZ, Inc.)  
Mishcon De Reya LLP (UK)  
Petra Funds Group, LLC  
Pluris Valuation Advisors, LLC  
Proskauer Rose LLP  
Stout Risius Ross, LLC  
WilliamsMarston LLC  
Wilson Sonsini Goodrich & Rosati, P.C.

**Rigmora Counsel**

Debevoise & Plimpton LLP  
Richards, Layton & Finger, P.A.

**Portfolio Companies (aka non-debtor affiliates)**

Aethon Therapeutics  
Ascidian Therapeutics (fka Pulsar Bio  
Therapeutics)  
Aulos Bioscience  
Braeburn  
Deep Apple Therapeutics

Galvaniz Therapeutics  
Marengo Therapeutics  
Replicate Bioscience

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Chelsea Technologies LLC  
Cogent Communications, LLC  
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Mark Mitchnick  
RXR HB Owner LLC  
The Agency Worldwide  
The Regents of the University of California  
Berkeley

**ATP Life Science Ventures, L.P. Equity Holders**

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Anna Batarina  
Danjie (Eva) Zhou  
David McIntyre  
Hamade Family Trust (dated 6/18/2003)  
Jonathan Waldstreicher  
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Les Pommes LLC c/o/ Apple Tree Ventures  
Management LLC  
Marie-Therese Afif  
Paul Eisenberg  
Rob Armstrong  
Sally Jacob  
Samuel Hall  
Seth L. Harrison  
Stephen G. Dance  
The Lauren A. Farrell Trust (dated 5/18/2018)  
William Engels

**ATP III GP, Ltd. Equity Holder**

Seth L. Harrison, MD

**Red Queen Therapeutics, Inc. Top 20 Unsecured Creditors**

Altasciences Company Inc.  
Dechert LLP

Omega Systems Consultants  
Omnicia, Inc.  
Pace Analytical Life Sciences, LLC  
Prendio LLC  
Sarah Recchio

**Red Queen Therapeutics, Inc. Equity Holders**

Dana-Farber Cancer Institute, Inc.  
Gregory Bird  
Henry Herce  
Loren Walensky  
Marilynn Bersoff  
Mark Mitchnick  
Namrata Turaga  
Paul Da Silva Jardine  
Paul Eisenberg  
Ravneesh Sachdev  
Spiros Liras

**Red Queen Therapeutics, Inc., Creditors**

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Aptar Congers  
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Bill.com  
Blue Cross Blue Shield  
Boston Industries, Inc.  
Brex  
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Cambridge Biolabs  
Cambridge Trust  
Cameron Wolfe  
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Charles River Laboratories, Inc.  
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Research  
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Zahra Fathi

**Initial Therapeutics, Inc. Top 20 Unsecured Creditors**

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Stemcell Technologies Inc  
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Brain Paegel  
Brooke Olsen Blair  
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Fred Ward  
Ilsa Kirby  
James H. Doudna Cate  
James and Jennifer Doudna Cate Living Trust  
(dated 1/2/2014)  
Kevan Shokat  
Kevan M. Shokat and Deborah Kamali, as trustees  
of the Shokat-Kamali Living Trust (dated  
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Matthew Jacobson  
Micheal Ehlers  
Mohan Sivaraja  
Mohit Trikha  
Neena Kadaba  
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**Initial Therapeutics, Inc., Creditors**

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Amaresh Keleta  
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Jeff Hsu  
Jena Bioscience GmbH  
Jennifer Rocnik  
Jessamyn Wead  
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JMP Group Inc.  
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Jonathan R Wong dba Enigma Search Solutions  
LLC  
Joesph M. Llovet  
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K.F. Howell Electric, Inc.  
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Kim F. McClure (Kb Pharma Consulting, LLC)  
Klein Hersh International  
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Kristine Anne Gordon  
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NovoPro Bioscience Inc.  
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OriGene Technologies, Inc.  
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Riposo Mobile  
Road Master Club  
Ronnie-Ray Abriam Orpilla  
Rosemarie O'Shea  
RStudio  
Rudra Nand  
Russell Reynolds Associates, Inc.  
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Samuel Munroe  
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San Francisco Baking Institute  
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Schrodinger, LLC  
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Slack  
Slidexpress PVT LTD  
SmartSign  
SnapGene  
SNPsaurus  
Solium Plan Managers LLC  
Soloprotect US  
SPRO  
Stanford University  
Staples  
Staples Advantage  
Starbucks  
Stella Alpina Osteria  
Stericycle, Inc.  
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Surplus Solutions LLC

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 TAQUERIA LAS PENCAS  
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 Tax1099  
 TeamViewer  
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 Technology & Patent Research International, Inc.  
 Teledyne ISCO  
 Thai Satay Restaurant & Bar  
 The Agency Worldwide  
 The Catalytic Agency, LLC  
 The Cohen Group  
 The Grove Wine Bar & Kitchen - Cedar Park  
 The Home Depot  
 The Honest Company  
 The Regents of the University of California, San Francisco  
 The Speech Improvement Company Inc.  
 Therma LLX  
 Thomas Scientific Holdings Inc  
 Thorlabs, Inc.  
 Tim French  
 Total Wine & More  
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 Uber  
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 Unity Biotechnology  
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 UPS Supply Chain Solutions, Inc.  
 Urban Kitchen  
 USA Scientific, Inc.  
 USPS  
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 Veloxee  
 Vincor Tech  
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 Waterco of California  
 Wave  
 Wave Rock  
 West Coast Chemistry Services  
 White Elephant Restaurant  
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 WuXi AppTec (Shanghi) Co., Ltd.  
 Yi Chao Fan  
 Yummy Home Plate  
 Zachary Sweeney (Edgewood Scientific Consulting)  
 Zazzle  
 Zoom Video Communications, Inc.  
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 Middlesex Gases & Technologies, Inc.  
 Norton Rose Fulbright US LLP  
 Pharmaron, Inc.  
 PPF OFF 150  
 Roger Benjamin Ruggeri  
 Safety Partners  
 Triumvirate Environmental, Inc.  
 Viva Biotech (Shanghai) Limited

**Marlinspike Therapeutics, Inc. Equity Holders**

Alessandro Boezio  
 Alexander McCampbell

Baylor College of Medicine  
Calla Olson  
Joseph Yanchik  
Kristen Karlin  
Paul Da Silva Jardine  
Rajesh Chopra  
Thomas Westbrook  
Victor Rusu

**Apertor Pharmaceuticals, Inc., Top 20  
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1640 South Loop Road LLC c/o Paceline  
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Alameda County Tax Collector  
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BioDuro, LLC  
BioProcure, Inc.  
Browne Consulting Group  
Cell Signaling Technology, Inc.  
Clarke Consulting, Inc.  
CSC Leasing Company  
De Lage Landen Financial Services, Inc.  
Digital Insurance, LLC  
Elsevier B.V.  
IQ Proteomics, LLC  
Laboratory Equipment Company  
Life Technologies Corporation  
Reaction Biology Corporation  
Science Suite Inc. dba BioRender  
University of North Carolina at Wilmington  
Zhejiang Huida Biotech Co., Ltd.

**Apertor Pharmaceuticals, Inc. Equity Holders**

Bo Pang  
Daniel Nomura  
Edmund Graziani  
Ericka Mendez  
Jay Keasling  
Jay D. Keasling Trust (Dated 8/5/2013)  
Kevan Shokat  
Lawrence Lum  
Matthew Jacobson  
Micheal White  
Neena Kadaba  
Paul De Silva Jardine  
Paul Eisenberg

Paul Hawkins  
Rajesh Chopra  
Samantha Bucktrout  
Shellwater & Company  
Spiros Liras

**Apertor Pharmaceuticals, Inc., Creditors**

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Abmole Bioscience Inc.  
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Access Plants LLC  
Adams & Chittenden Scientific Glass  
ADP  
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AK Scientific, Inc.  
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Amazon Capital Services  
Amazon Web Services  
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AmiD Biosciences LLC  
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Apple Tree Life Sciences, Inc.  
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 Bio-Rad Laboratories, Inc.  
 Biotage LLC  
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 Comcast  
 Commonwealth of Massachusetts  
 ComputerCare, LLC  
 Cooley LLP  
 Copyright Clearance Center, Inc.  
 CozChemix Limited  
 Creative Bioarray  
 Creative BioMart Inc.  
 Credit Card Misc.  
 CT Corporation  
 CTK Instruments LLC  
 Data Kable Technology Inc  
 Dean Olson Patent Consulting LLC  
 Demetrix, Inc.  
 Denisse Martinez  
 Diaago LLC  
 Diego Garrido Ruiz  
 Discovery Life Sciences  
 Discovery Scientific Solutions LLC  
 Diversified Laboratory Repair, Inc.  
 Dragonfly Design Group, Inc.  
 E-Control Systems, Inc.  
 Elson Electric  
 Epoch Life Science, Inc.  
 Eppendorf North America, Inc.  
 Esco Technologies, Inc.  
 EyeMed  
 Fahim Syed  
 FedEx Freight  
 First Choice Coffee Services  
 Fisher Scientific  
 Flowjo, LLC  
 Fortis Life Sciences fna Bethyl Laboratories  
 Foxx Life Sciences, LLC  
 Fragomen, Del Ray, Bernsen & Loewy, LLP  
 FUJIFILM Wako Chemicals U.S.A. Corporation  
 Genesee Scientific Corporation  
 Genewiz, LLC  
 Genprice Inc.  
 GenScript USA Inc.  
 Gentige USA Sales, LLC  
 Global Industrial  
 Global Life Sciences Solutions USA LLC  
 Gold Biotechnology  
 Gordon Research Conferences  
 Grainger  
 GSL Biotech, LLC  
 Hamilton Company, Inc.  
 Harris & Lee Environmental Sciences LLC  
 HARVARD APPARATUS  
 Heather Roth  
 Hooke Laboratories, Inc.  
 HIS  
 ICE Safety Solutions  
 IKA Works, Inc.  
 Independent Plumbing Co.  
 Infors USA Inc.

Ingenium Group, LLC  
Initial Therapeutics, Inc.  
Integra Biosciences Corporation  
Integrated DNA Technologies, Inc.  
Intuit, Inc  
Invested Digital Group, Inc.  
Iron Box LLC  
Isomerase Therapeutics Ltd  
James Kim  
Jeff Wong  
Jeremy Barton Consulting Inc.  
Karen Sutherland  
KBA Document Solutions, LLC  
Kelly Services  
Labelmaster  
LABRepCo LLC  
Lambda  
Lawson Drayage, Inc  
Leibniz- Institut DSMZ-Deutsche Sammlung von  
Mikroorganismen und Zellkulturen GmbH  
Leo Letendre  
LHE Bioscience Inc.  
LI-COR Biotech, LLC  
LI-COR, Inc.  
Linde Gas & Equipment Inc.  
Litmos US, L.P. f/k/a Solo Operations US, LLC  
Lonza Walkersville, Inc.  
Mallory Safety and Supply LLC  
Marmon Biostatistics  
Marvelgent Biosciences, Inc.  
McMaster-Carr  
MedChemExpress, LLC  
MedSupply Partners  
Mettler-Toledo Rainin, LLC  
Mettler-Toledo, LLC  
Microverse Studios  
Molecular Devices  
Mosaic Network  
Nacalai USA, Inc.  
Naomy Jareily Ruvalcaba  
National Institute of Technology and Evaluation  
Nationwide Screening Services  
NBS Scientific, LLC  
NCS Moving Services  
Nefeli Chanoutsis  
Neil Vasan  
New England BioLabs, Inc.  
New Life Scientific, Inc.  
New Pig Corporation  
North America Immigration Law Group  
Novogene Corporation Inc.  
Novus Biologicals, LLC  
NW Seacology  
NXT Power  
Okta, Inc.  
OTJ Architects  
Oxford Nanopore Technologies Inc.  
Peak Scientific, Inc.  
Pete KOH Installations  
Phenomenex, Inc.  
Plasmidsaurus  
Prenido LLC  
Prestige Lens Lab  
PricewaterhouseCoopers LLP  
Promega Corporation  
ProPharma Group LLC  
Protection Plus Security Services  
Proteintech Group, Inc.  
Qiagen LLC  
QuakeHold Industrial, Inc.  
R&D Systems, Inc.  
Rabin  
Raissa Estrela Curado  
Ray Liu Consulting LLC  
Regina Roodhouse  
Revvity Health Sciences, Inc.  
Revvity Signals Software, Inc.  
Roman Aguirre  
Rose Citron  
San Mateo County Tax Collector  
Sandra Santulli-Marotto  
Santa Cruz Biotechnology, Inc.  
SBS Pharma Consulting  
Sciencelo  
Scientific Plastics Company, Inc.  
SciSafe Inc.  
Seismic Installations  
Sentinel Benefits  
SeqCenter  
SEQUETECH CORP  
Sequoia Signs & Graphics, Inc.  
SFS Chemical Safety

Shimadzu Scientific Instruments, Inc.  
 Shinji Kasahara  
 Sigma-Aldrich, Inc.  
 Signalchem Biotech Inc.  
 Signosis, Inc.  
 Silas Burdick  
 Sino Biological US inc.  
 SL2T LLC  
 SmartSheet Inc.  
 SNPsaurus LLC  
 Solium Plan Managers LLC  
 SoloProtect US LLC  
 South San Francisco Fire Department  
 Southern Biotech  
 Staples Advantage  
 State of CA – Franchise Tax Board  
 State of Delaware – Division of Corporations  
 Stemcell Technologies Inc  
 STERIS Corporation  
 Strategic Spaces, LLC  
 STRUCTURAL ENGINEERS, INC.  
 Sun Life Assurance Company of Canada  
 Takara Bio USA, Inc.  
 Technical Safety Services, LLC  
 Teco Pneumatic  
 Tenova Pharmaceuticals Inc.  
 Thames Pharma Partners, LLC  
 The Cambridge Crystallographic Data Centre  
 The Cohen Group  
 The Ogilvy Group LLC  
 The Regents pf the University of California  
 Thermo Fisher Financial Services Inc.  
 Thomas Scientific, LLC  
 Tinghua Cao  
 Toronto Research Chemicals, Inc.  
 Tracking Solutions, Inc.  
 Twist Bioscience Corporation  
 Uline, Inc.  
 US Bank Equipment Finance  
 USA Scientific  
 Varigen Biosciences  
 Vascumab LLC  
 Veolia Water Technologies, Inc.  
 VWR International LLC  
 William A. Faubion, M.D.  
 Wuxi AppTec (HongKong) Limited

Wynden Stark LLC  
 XanTec bioanalytics GmbH  
 Zymo Research Corporation

**Evercrisp Biosciences, Inc. Top 20 Unsecured Creditors**

Admera Health, LLC  
 Agilent Technologies, Inc.  
 BioMetas Group Limited  
 Browne Consulting Group  
 Charles River Laboratories, Inc.  
 ChemPartner Corporation Chengdu ChemPartner Co., Ltd.  
 CSC Leasing Company  
 Digital Insurance, LLC  
 Fisher Scientific  
 Global Project Partners, LLC  
 Horizon Discovery Biosciences Ltd  
 Life Technologies Corporation  
 Marija Zecevic  
 Pegasus Purchaser Inc., - BioProcure LLC  
 Robert Thomas Abraham  
 Tanja Kortemme  
 VWR International, LLC  
 Wuxi AppTec (HongKong) Limited

**Evercrisp Biosciences, Inc. Equity Holders**

Ajeeth Adhikari  
 Benjamin Jagger  
 Brian Vash  
 Cody Krivacic  
 Geoffrey Berguig  
 Jennifer Doudna  
 Matthew Jacobson  
 Meenu Karson  
 Neena Kadaba  
 Peng Cheng Zhang  
 Raj Chopra  
 Spiros Liras  
 Stephanie Maiocco  
 Steven Strutt  
 Victor Rusu

**Nine Square Therapeutics, Inc. Top 20 Unsecured Creditors**

Amazon Web Services

Amprion, Inc.  
Biognosys AG  
Browne Consulting Group  
CAS  
Cell Signaling Technology, Inc.  
FUJIFILM Cellular Dynamics, Inc.  
Hooke Laboratories, LLC  
Institut Curie  
LeadTech Pharma, Inc.  
Life Technologies Corporation  
Mettler-Toledo Rainin, LLC  
Pegasus Purchaser, Inc. (BioProcure)  
Pharmaron  
PLANET PHARMA, LLC  
Regents of the University of Michigan  
Revvity Health Sciences, Inc.  
Viva Biotech (Shanghai) Limited  
Wuxi AppTec United

**Nine Square Therapeutics, Inc. Equity Holders**

Aimee Kao  
Alexander McCampbell  
Brina Le  
Chakrapani Kalyanaraman  
Damoder Motati  
Hoi-Shan (Helen) Wong  
Jacob Meller Eriksen  
James Summers  
John Hood  
Kristine A. Gordon  
Lani Wu  
Louise Heinrich  
Mark Rosen  
Matthew Jacobson  
Micheal Ehlers  
Neena Kadaba  
Paul Da Silva Jardine  
Robert Edwards  
Robert Paul  
Roberto Zoncu  
Sami Barmada  
Samuel Clark  
Sarah Smith  
Spiros Liras  
Steven Altschuler  
Tetsuya Kobayashi

Tina Schwabe

**Rigmora LPs**

Rigmora Biotech Investor One LP  
Rigmora Biotech Investor Two LP

**Nereid Therapeutics Equity Holders**

Alex McCampbell  
Alice Ting  
Bahareh Eftekharzadeh  
Chanelle Jumper  
Cigall Kadoch  
Dr. Clifford Brangwynne  
Eugene Lee  
Defne Yasar  
Ivan Efremov  
Jared Toettcher  
John Reilly  
Dr. Laura Forese  
Matthew Jacobson  
Robert Hugin  
Spiros Liras

**Nereid Therapeutics Top 20 Unsecured Creditors**

Amnet Systems, LLC  
AustinPX LLC  
Beckman Coulter, Inc.  
BioDuro, LLC  
Crelux GmbH  
Crystal Pharmatech Co., Ltd.  
Eurofins Panlabs Inc.  
Evotec US  
Life Technologies Corporation  
Nexomics BioSciences  
Oncolines  
Premier Research Consulting, LLC Reaction  
Biology Corporation  
RREF II 451D, LLC  
Schrodinger, LLC  
STA Pharmaceutical Hong Kong Limited  
VectorBuilder, Inc.  
Viva Biotech (Shanghai) Limited  
Wuxi AppTec

**SCHEDULE 2**

**Disclosures to Cole Schotz Retention Application**

Parties who are current or former clients of Cole Schotz in matters unrelated to the Chapter 11 Cases, whose names include the following:

<b>Name of Interested Party Searched</b>	<b>Relationship to Debtors</b>	<b>Name of Entity that is a Cole Schotz Client</b>	<b>Relationship to Cole Schotz</b>
ADP, Inc.	Creditor	ADP International, Inc.	Current Client
Ascidian Therapeutics (FKA Pulsar Bio Therapeutics)	Non-Debtor Affiliate	Ascidian Therapeutics, Inc.	Current Client in unrelated intellectual property matters
B. Riley Restructuring Services, LLC	Debtor Professional	B. Riley Securities, Inc.	Former Client
Banc of California	Bank	Bank of California	Former Client
Blue Cross Blue Shield	Creditor	Horizon Blue Cross Blue Shield of New Jersey	Former Client
Buchi Corporation	Creditor	Buchi Corp.	Current Client
Cogent Communications, LLC	Creditor	Cogent Communications, Inc.	Current Client
Continental Casualty Company	Insurance Provider	Continental Casualty Company	Cole Schotz currently represents a group of ad hoc lenders in which Continental Casualty Company is a member
Dundon Advisers LLC	Committee Professional	Dundon Advisers LLC	Current Client
Guidepoint Global, LLC	Contract Counterparty	Guidepoint Global, LLC	Current Client
JP Morgan Chase Bank, N.A.	Bank	JP Morgan Chase & Co.	Affiliate of a Former Client
PricewaterhouseCoopers LLC	Creditor	Pricewaterhouse & Co.	Former Client
Verizon	Utility Provider	Verizon Pennsylvania, Inc.	Affiliate of Former Client

As part of its diverse practice, Cole Schotz appears in numerous cases, proceedings and transactions involving many different professionals, including other attorneys, accountants, financial consultants and investment bankers, some of whom are or represent parties-in-interest in the Chapter 11 Cases. Cole Schotz does not, and will not, represent any such professional in the Chapter 11 Cases. In addition, Cole Schotz has been in the past, and likely will be in the future, engaged in matters unrelated to the Debtors or these Chapter 11 Cases in which it works with or in opposition to other professionals involved in these Chapter 11 Cases. Moreover, Cole Schotz might have referred work to other professionals retained in these Chapter 11 Cases. For example, Cole Schotz periodically represents Matthew Dundon, Principal of Dundon Advisers, LLC in Mr. Dundon's capacity as a liquidating trustee and/or plan administrator in various unrelated chapter 11 matters. Likewise, professionals retained in these Chapter 11 Cases might have referred work to Cole Schotz. To the best of my knowledge, information and belief, insofar as I have been able to ascertain after reasonable inquiry, none of these business relationships constitute interests adverse to the Debtors' estates.

Justin R. Alberto, a member of Cole Schotz, currently serves as a mediator in an unrelated matter, *AmeriFirst Financial, Inc. v. Bowlby, et al.* A party to the litigation is represented by Quinn Emanuel Urquhart & Sullivan, LLP.

Furthermore, United States Bankruptcy Judge for the District of Delaware J. Kate Stickle was a former partner at Cole Schotz.

**EXHIBIT B**

**Committee Declaration**

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

In re:

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

Chapter 11

Case No. 25-12177 (LSS)

(Jointly Administered)

**DECLARATION OF MICHAEL B. DILLING OF BAYLOR COLLEGE OF MEDICINE  
IN SUPPORT OF THE APPLICATION FOR AN ORDER  
PURSUANT TO 11 U.S.C. §§ 328(a) AND 1103 AUTHORIZING  
AND APPROVING THE RETENTION AND EMPLOYMENT OF  
COLE SCHOTZ P.C. AS COUNSEL TO THE OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS EFFECTIVE AS OF JANUARY 23, 2026**

I, Michael B. Dilling, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. My name is Michael B. Dilling. I am over the age of 21 and am competent in all respects to make this Declaration. I am the Chairperson of the Official Committee of Unsecured Creditors (the “Committee”) of Apple Tree Life Sciences, Inc., *et al.* (collectively, the “Debtors”) in these chapter 11 cases (the “Chapter 11 Cases”).

2. I am authorized to make this declaration (this “Declaration”) in support of the Committee’s application (the “Application”)<sup>2</sup> seeking authorization to retain Cole Schotz P.C. (“Cole Schotz”) as its counsel pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014 and Local Rule 2014-1. Except as otherwise noted, I have personal knowledge as to all of the information set forth below.

<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); and Nine Square Therapeutics, Inc. (4503). 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 shall have the meanings ascribed to such terms in the Application.

3. This Declaration is provided pursuant to the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013* (the “Revised UST Guidelines”). Except as otherwise noted, all facts in this Declaration are based on my personal knowledge of the matters set forth herein, information gathered from my review of relevant documents and information supplied to me by Cole Schotz.

4. I am informed by counsel that Paragraph D.2 of the Revised UST Guidelines suggests that any application for employment of an attorney under sections 327 or 1103 of the Bankruptcy Code be accompanied by a verified statement from the client that addresses the following:

- (a) The identity and position of the person making the verification. The person ordinarily should be the general counsel of the debtor or another officer responsible for supervising outside counsel and monitoring and controlling legal costs.
- (b) The steps taken by the client to ensure that the applicant’s billing rates and material terms for the engagement are comparable to the applicant’s billing rates and terms for other non-bankruptcy engagements and to the billing rates and terms of other comparably skilled professionals.
- (c) The number of firms the client interviewed.
- (d) If the billing rates are not comparable to the applicant’s billing rates for other non-bankruptcy engagements and to the billing rates of other comparably skilled professionals, the circumstances warranting the retention of that firm.
- (e) The procedures the client has established to supervise the applicant’s fees and expenses and to manage costs. If the procedure for the budgeting, review and approval of fees and expenses differ from those the client regularly employs in non-bankruptcy cases to supervise outside general counsel, explain how and why. In addition, describe any efforts to negotiate rates including rates for routine matters, or in the alternative to delegate such matters to less expensive counsel.

**Identity of Declarant**

5. On January 20, 2026, the Office of the United States Trustee for Region 3 (the “U.S. Trustee”) appointed a three-member Committee consisting of: (i) Fujifilm Cellular Dynamics Inc.; (ii) Global Project Partners, LLC; and (iii) Baylor College of Medicine. *See* Docket No. 194. Baylor College of Medicine serves as the Chairperson of the Committee.

6. On January 23, 2026, the Committee selected Cole Schotz as counsel and Dundon Advisers, LLC (“Dundon”) as financial advisor. As Chairperson and a member of the Committee, I was directly involved in the Committee’s decision to retain Cole Schotz.

**Steps Taken to Ensure the Comparability of Engagement Terms**

7. Cole Schotz has informed the Committee that its rates for bankruptcy representations are comparable to the rates Cole Schotz charges for non-bankruptcy representations, and that Cole Schotz endeavors to set its hourly rates for attorneys and professionals at levels competitive to those charged by peer firms.

8. Following its formation, the Committee elected to only interview one law firm to represent the Committee as bankruptcy counsel in these Chapter 11 Cases. After interviewing Cole Schotz, the Committee selected Cole Schotz as its proposed counsel because of its extensive experience representing committees and other parties in chapter 11 proceedings, as well as its knowledge and expertise in the fields of, *inter alia*, debtors’ and creditors’ rights and bankruptcy. In addition, several of the attorneys at Cole Schotz are members in good standing of the Bar of the Supreme Court of Delaware and regularly practice before this Court. Therefore, it is the Committee’s opinion that Cole Schotz is well qualified to represent and assist the Committee in performing its duties in the Chapter 11 Cases.

**Rate Structure**

9. Cole Schotz has informed the Committee that its hourly rates are subject to periodic adjustments (typically on or about September 1 of each year) to reflect economic and other conditions.

10. By virtue of the foregoing, and for the reasons set forth in the Application and the Alberto Declaration, the Committee believes that Cole Schotz is well qualified to represent the Committee in the Chapter 11 Cases as counsel and seeks entry of an order in the form attached to the Application authorizing the Committee to retain Cole Schotz effective as of January 23, 2026 in accordance with the terms set forth in the Application and the Alberto Declaration.

**Procedures Established to Supervise Fees and Expenses and Manage Costs**

11. I understand that Cole Schotz will be using budget and staffing reports for legal services provided to the Committee during this engagement. The Committee recognizes that in the course of a chapter 11 case, there may be unforeseeable fees and expenses that will need to be addressed by the Committee and Cole Schotz. Therefore, the Committee recognizes that it is its responsibility to closely monitor the billing practices of its counsel to ensure that the fees and expenses paid by the estates remain consistent with the Committee's expectations and exigencies of these cases. The Committee will continue to review the invoices submitted by Cole Schotz, and together with Cole Schotz, may periodically amend the budget and staffing plan as the cases develop to reflect changed circumstances or unanticipated developments.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 4, 2026

**THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS OF APPLE  
TREE LIFE SCIENCES, INC., *ET AL.***

*/s/ Michael B. Dilling* \_\_\_\_\_

By: Michael B. Dilling

On behalf of Baylor College of Medicine,  
Solely in his capacity as Chairperson of the  
Official Committee of Unsecured Creditors of  
Apple Tree Life Sciences, Inc., *et al.*

**EXHIBIT C**

**Proposed Order**

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

In re:

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

Debtors.

Chapter 11

Case No. 25-12177 (LSS)

(Jointly Administered)

**ORDER PURSUANT TO  
11 U.S.C. §§ 328(a) AND 1103 AUTHORIZING  
AND APPROVING THE RETENTION AND EMPLOYMENT OF  
COLE SCHOTZ P.C. AS COUNSEL TO THE OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS EFFECTIVE AS OF TO JANUARY 23, 2026**

Upon the application (the “Application”)<sup>2</sup> of the Official Committee of Unsecured Creditors (the “Committee”) of Apple Tree Life Sciences, Inc., *et al.* (collectively, the “Debtors”) for entry of an order, pursuant to sections 328(a) and 1103(a) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), authorizing the Committee to retain and employ Cole Schotz P.C. (“Cole Schotz”) as its counsel in connection with the Debtors’ chapter 11 cases (the “Chapter 11 Cases”) effective as of January 23, 2026, and upon the declaration of Justin R. Alberto, a member in the Bankruptcy & Corporate Restructuring group of Cole Schotz (the “Alberto Declaration”), and upon the declaration of Michael B. Dilling, solely in his capacity as Chairperson of the Committee (the “Committee Declaration”), and together with the Alberto

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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); and Nine Square Therapeutics, Inc. (4503). 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 shall have the meanings ascribed to such terms in the Application.

Declaration, the “Declarations”); and it appearing that the attorneys of Cole Schotz who will perform services on behalf of the Committee in the Chapter 11 Cases are duly qualified to practice before this Court; and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the Court under 28 U.S.C. § 157 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 this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court finding, based on the representations made in the Application and the Declarations, that Cole Schotz does not represent any interest adverse to the Committee or the Debtors’ estates with respect to the matters upon which it is to be engaged, that it is a “disinterested person” as that term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code, that its employment is necessary and appropriate and in the best interests of the Committee and the Debtors’ estates; and finding that adequate notice of the Application having been given; and it appearing that no other notice need be given; and after due deliberation and sufficient cause appearing therefor, it is hereby

**ORDERED, ADJUDGED AND DECREED** that:

1. The Application is APPROVED as set forth herein.
2. The Committee is hereby authorized to retain and employ Cole Schotz as its counsel in these Chapter 11 Cases, effective as of January 23, 2026, pursuant to sections 328(a) and 1103 of the Bankruptcy Code, as contemplated by the Application and on the terms provided in the Application and the Alberto Declaration, and Cole Schotz is authorized to perform the services set forth in the Application and the Alberto Declaration, as may be modified herein.

3. Cole Schotz shall be compensated in accordance with procedures set forth in sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and such procedures as may be fixed by order of this Court.

4. Notwithstanding anything to the contrary in the Application or the Alberto Declaration, Cole Schotz shall not seek reimbursement of any fees or costs arising from the defense of any of Cole Schotz's fee applications in these Chapter 11 Cases.

5. Cole Schotz shall make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013* (the "Revised UST Guidelines") in connection with any interim or final fee applications Cole Schotz files in the Chapter 11 Cases.

6. Notwithstanding anything in the Application or this Order to the contrary, all parties shall retain the right and be entitled to object to Cole Schotz's fee applications based on the reasonableness standard provided for in section 330 of the Bankruptcy Code, including, without limitation, objections to fees and expenses on the basis of duplication of efforts among the Committee's professionals.

7. Consistent with the Revised UST Guidelines, Cole Schotz shall provide ten (10) business days' notice to the Debtors, the Committee, and the U.S. Trustee before any increases in the rates set forth in the Application are implemented and shall file such notice with the Court. The U.S. Trustee retains all rights to object to any rate increase on all grounds, including the reasonableness standard set forth in section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

8. Notwithstanding anything in the Application to the contrary, to the extent that Cole Schotz uses the services of independent contractors or subcontractors (collectively, the “Contractors”) in these cases, Cole Schotz shall (i) pass through the cost of such Contractors at the same rate that Cole Schotz pays the Contractors; (ii) seek reimbursement for actual costs only; (iii) ensure that the Contractors are subject to the same conflicts checks as required for Cole Schotz; and (iv) file with this Court such disclosures required by Bankruptcy Rule 2014.

9. Cole Schotz shall use its reasonable efforts to avoid any duplication of services provided by any of the Committee’s other retained professionals in these Chapter 11 Cases.

10. To the extent that there may be any inconsistency among the terms of the Application, the Alberto Declaration and this Order, the terms of this Order shall govern.

11. The Committee is authorized and empowered to take all actions necessary to effectuate the relief granted by this Order.

12. Notwithstanding the possible applicability of Bankruptcy Rules 6004, 7062, 9014 or otherwise, or any Local Rule that might otherwise delay the effectiveness of this Order, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

13. The Court shall retain jurisdiction to hear and determine all matters arising under or related to the implementation or interpretation of this Order.