

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

In re:

Apple Tree Life Sciences, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-12177 (LSS)

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
DUNDON ADVISERS LLC AS FINANCIAL ADVISOR 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 chapter 11 case (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 Dundon Advisers LLC (“Dundon”) as financial advisor to the Committee effective as of January 23, 2026. In support of the Application, the Committee submits (i) the declaration of Matthew Dundon attached hereto as **Exhibit A** (the “Dundon Declaration”) and (ii) the declaration of Michael B. Dilling of Baylor College of Medicine, not in his individual capacity but solely as

¹ 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.



Chairperson of the Committee, 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

A. The Chapter 11 Case

5. On December 9 and 15, 2025 (the “Petition Date”),² 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

² Additional Debtor entities filed voluntary petitions on January 1 and 15, 2026.

to operate and manage their business as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

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.³ Baylor College of Medicine serves as the chairperson of the Committee.

7. On January 23, 2026, the Committee selected Cole Schotz P.C. (“Cole Schotz”) as its counsel and Dundon as the Committee’s 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 Dundon as its financial advisor to represent the Committee in all phases of the Chapter 11 Case effective as of January 23, 2026, which is the date Dundon was selected as proposed financial advisor and commenced providing services on behalf of the Committee.

9. Contemporaneously herewith, the Committee is filing an application to retain Cole Schotz as its counsel. Dundon and Cole Schotz will coordinate responsibilities and services rendered to the Committee to avoid any unnecessary duplication and inefficiencies.

BASIS FOR RELIEF

10. The Committee requests that the Court approve its retention of Dundon as its financial advisor to perform certain services that will be necessary during the Chapter 11 Case in accordance with Dundon’s standard hourly rates and disbursement policies.

³ Docket No. 194.

11. The Committee selected Dundon as its financial advisor because of the firm's extensive experience representing committees in complex chapter 11 proceedings. Dundon Advisers or its affiliate IslandDundon LLC acts or acted as financial advisor to: Official Committees of Unsecured Creditors of *I Global* (SD FL), *Acorda Therapeutics* (SDNY), *Agera Energy* (SDNY), *Aequor Management* (ED TX), *Aerofarms* (Delaware), *AFM Mattress* (Delaware), *AfterShock Comics* (CD CA), *Alamo Drafthouse* (Delaware), *All American Oil and Gas* (WD TX), *Allegiance Coal* (Delaware), *Alpha Entertainment* (Delaware), *Alpha Media* (ED VA), *America's Gardening Resource* (Delaware), *American Virtual Cloud Technologies* (Delaware), *Ample* (Southern District of Texas), *AmeriFirst* (Delaware), *AmeriMark* (Delaware), *Aralez Pharmaceuticals* (SDNY), *Automated Trucking* (MD FL), *Avant Gardner* (Delaware), *Aztec Shaeffer* (WD TX), *BeavEx* (Delaware), *Bela Flor* (ND TX), *Better Nutritionals* (CD CA), *Big Village* (Delaware), *Biolase* (Delaware), *BGP / Peltz Shoes* (MD FL), *Catona [CTN]* (Delaware), *Celadon* (Delaware), *Blink Fitness* (Delaware), *Car Toys* (WD WA), *Coach* (Delaware), *Comcar* (Delaware), *Danimer* (Delaware), *DCA Outdoor* (WD MO), *DMK Pharmaceuticals* (Delaware), *Dormify* (Delaware), *Eco-Stim* (SD TX), *Elite Equipment / Reliable Crane* (Montana), *Elite Limousine* (ED NY), *Endo International* (SDNY), *Excell* (ED NY), *FCI Sand* (ND TX), *First Mode* (Delaware), *Flagship Resorts* (New Jersey), *Fluid Market* (Delaware), *Food52* (Delaware), *Franks Theatres* (New Jersey), *Front Sight Management* (Nevada), *F-Start* (SD TX), *Fulcrum Sierra* (Delaware), *Fuse Media* (Delaware), *García Grain Trading* (SD TX), *Global Concessions* (ND GA), *Glostation USA* (CD CA), *Gold's Gym* (ND TX), *Goodrich Quality Theaters* (WD MI), *Ho Wan Kwok* (Connecticut), *Humanigen* (Delaware), *Hwy 55 [Little Mint]* (ED NC), *(HyreCar* (Delaware), *IG Design* (SD TX), *Impresa Aerospace* (Delaware), *In-Shape* (Delaware), *iPic* (Delaware), *iSun* (Delaware), *Ittella (Tattooed Chef)* (CD CA), *Jagged*

Peak/Trade Global (Nevada), *Juno USA* (Delaware), *K&W Cafeterias* (MD NC), *KidKraft* (ND TX), *Lannett* (Delaware), *LaSalle Group* (ND TX), *LBI Media* (Delaware), *Loot Crate* (Delaware), *Lifesize* (SD TX), *Lucira Health* (Delaware), *Madison Square Boys & Girls Clubs* (SDNY), *Maines Paper & Food* (Delaware), *Mallinckrodt* (Delaware), *Matheson* (ED CA), *McClatchy* (SDNY), *MediaMath* (Delaware), *Meridian Restaurants* (Utah), *Miles Keller Trucking* (CD IL), *Mitchell Gold* (Delaware), *NewAge* (Delaware), *NG Purvis Farms* (ED VA), *Nogin* (Delaware), *Nova Shurline Wildcat* (Delaware), *Novan* (Delaware), *Omega Therapeutics* (Delaware), *Omnicare* (ND TX), *One Table* (Delaware), *Open Road Films* (Delaware), *OYA Renewables* (Delaware), *Packable* (Delaware), *Pear Therapeutics* (Delaware), *Peer Street* (Delaware), *Pipeline Foods* (Delaware), *Planta [CHG US Holdings]* (Delaware), *Off Lease Only* (Delaware), *Out of the Gate* (Delaware), *Plastiq* (Delaware), *Platinum Corral* (ED NC), *Port Elizabeth* (New Jersey), *Professional Technical Security Services* (ND CA), *Proteus Heath* (Delaware), *Quanergy* (NJ), *Remnant Oil Company* (WD Texas), *Rive Gauche Television* (CD CA), *Rocking M Media* (Kansas), *Roman Catholic Diocese of Albany* (ND NY), *Rue 21 [2024]* (Delaware), *SIW Holdings* (Delaware), *Slidebelts* (ED CA), *South American Beef* (SD IA), *Structurlam* (Delaware), *Studio Movie Grill* (ND TX), *Sunergy* (ED CA), *Sungard Availability Services* (SD TX), *Supply Source* (Delaware), *Takeoff Technologies* (Delaware), *Tehum Care Services, Inc.* (SD TX), *TOMS King* (ND OH), *TPC Group* (Delaware), *Trinitas Farming* (ND CA), *UpHealth* (Delaware), *Valmiera Glass* (ND GA), *Vector Launch* (Delaware), *Video Corporation of America* (New Jersey), *Village Roadshow* (Delaware) *Volunteer Energy* (SD OH), *Wave Technologies* (ND CA), *Wellmade* (ND GA), *Wellpath* (SD TX), *Westlake Surgical* (WD TX), *Whittier Seafood* (Alaska), *Williams Industrial* (Delaware), *YogaWorks* (ND TX), *YouFit* (Delaware), *Zigi* (SDNY), and *Zynex* (SD TX), and the Ad Hoc Group of Equity Security Holders in *Clearside* (Delaware), the Ad Hoc

Group of Unsecured Noteholders of Crown Capital Holdings (out of court, prior to the commencement of the issuers' Chapter 11 proceedings, in which IslandDundon LLC acts as debtor financial adviser), the Official Committee of Equity Interest Holders in *Eiger Biopharmaceuticals* (ND TX), the Ad Hoc Group of Consumer and Worker Litigation Claims in *Rite Aid* (SDNY), the Ad Hoc Group of Consumer and Worker Litigation Claimants in *Hertz* (Delaware), the Committee of Customers in *Lear Capital* (Delaware), the Official Committee of Tort Claimants in *PG&E* (ND CA), the Ad Hoc Group of Individual Victims in *Purdue* (SDNY), the Ad Hoc Group of Second Lien Bondholders in *CalPlant* (Delaware), the Ad Hoc Group of Healthcare Providers in *American Physician Partners* (Delaware), the Official Committee of Unsecured Commercial Creditors of the *Roman Catholic Archdiocese of New Orleans* (ED LA), the Ad Hoc Group of Equity Security Holders in *RAIT* (Delaware), Ad Hoc Noteholder Group in *WOM* (Delaware), the Ad Hoc Noteholder Group in *Woodbridge Group of Companies* (Delaware), and the Ad Hoc Group of Equity Interest Holders in *Voyager* (SDNY). All of the foregoing are highly complex chapter 11 cases.

12. The Committee seeks to retain Dundon because Dundon is well qualified to represent, advise and assist the Committee in performing its duties in the Chapter 11 Case.

SERVICES TO BE PROVIDED BY DUNDON

13. **Consulting Services.** The Committee respectfully submits that it is necessary and appropriate to employ and retain Dundon as its financial advisor perform certain consulting services to represent it in the Chapter 11 Cases and render various professional services to enable it to faithfully execute its duties. Dundon's consulting services (the "Consulting Services") may include, but are not limited to, and in each case excluding any services fairly classified under the Transaction Services set forth in the next paragraph:

- a. Serving as financial advisor to the Committee;
- b. Assisting in the analysis, review, and monitoring of the restructuring process, including, but not limited to, an assessment of potential recoveries for unsecured creditors;
- c. Developing a complete understanding of Debtors' business, including their debtor and non-debtor portfolio companies, intellectual property and their valuations;
- d. Determining whether there are viable alternative paths for the disposition of the Debtors' assets from those currently or in the future proposed by any Debtors;
- e. Advising the Committee on the marketing process of the Debtors' assets to any company or on a potential plan of reorganization.
- f. Assisting in valuing any bids or term sheets received for the Debtors' assets;
- g. Evaluating term sheets received related to potential DIP financing, litigation funding/financing, and/or exit financing.
- h. Assisting the Committee in identifying, valuing, and pursuing estate causes of action, including, but not limited to, relating to prepetition transactions, control person liability, and lender liability;
- i. Assisting the Committee to analyze, classify and address claims against the Debtors and to estimate (in any formal or informal sense) the different claims pools, including the analysis of contingent, unliquidated, and disputed claims;
- j. Assisting the Committee to identify, preserve, value, and monetize tax assets of the Debtors, if any;
- k. Advising the Committee in negotiations with the Debtors, lenders of the Debtors' portfolio companies, and third parties;
- l. Analyzing and reviewing the Debtors' financial reports, including monthly operating reports and the filed statement of financial affairs and schedule of assets and liabilities;
- m. Assisting the Committee in reviewing the Debtors' cost/benefit analysis with respect to the assumption or rejection of various executory contracts and leases (if necessary);
- n. Reviewing and providing analysis of operating budgets, actual-budget variances, and liquidity;

- o. Assisting the Committee in evaluating and analyzing avoidance actions, including fraudulent conveyances and preferential transfers;
- p. Reviewing and providing analysis of any proposed disclosure statement and chapter 11 plan and, if appropriate, assist the Committee in developing an alternative chapter 11 plan;
- q. Attending meetings and assisting in discussions with the Committee, the Debtor, the secured lender, the U.S. Trustee and other parties in interest and professionals;
- r. Presenting at meetings of the Committee, as well as meetings with other key stakeholders and parties;
- s. Providing testimony on behalf of the Committee as and when may be deemed appropriate; and
- t. Performing other advisory services for the Committee as may be necessary or proper in these proceedings.

14. **Transaction Services.** In addition to the Consulting Services outlined above, the Committee requests the retention and employment of Dundon to (i) introduce to the Debtors lenders not contacted by the Debtors' restructuring advisor, B. Riley Restructuring Services LLC ("B. Riley"), as potential providers of debtor-in-possession financing ("DIP Financing"), and assist in negotiating terms of any contemplated DIP financing with such lenders, and (ii) introduce to the Debtors, or to the Debtors and the Committee if and after the Debtors' Chapter 11 Plan exclusivity expires or is terminated by the Court, parties who may provide exit financing and/or purchase all or part of the Debtors' assets the proceeds of which will provide for stakeholder recovery ("Exit Transaction") (collectively, the "Transaction Services").

15. The Committee respectfully represents that it is necessary for the Committee to retain a financial advisor to perform the above-referenced Consulting Services and Transaction Services and otherwise assist the Committee in fulfilling its statutory duties under the Bankruptcy Code. Dundon 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 financial advisor.

DISINTERESTEDNESS OF DUNDON

16. To the best of the Committee's knowledge, information and belief and as evidenced by the Dundon Declaration, Dundon nor any of its affiliates do not currently hold or represent any interest adverse to the interest of the estate or creditors or equity security holders with respect to the matters in which Dundon is to be employed, except as set forth therein, and Dundon is "disinterested" under section 101(14) of the Bankruptcy Code.

17. Except as disclosed in the Dundon Declaration, neither Dundon nor any of its affiliates have any connections with any entities other than the Committee, in matters related to the Chapter 11 Case. Dundon may have a connection or may have had a connection with certain parties with interests in the Chapter 11 Cases on matters unrelated to the Chapter 11 Cases. As set forth in the Dundon Declaration, Dundon 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.

18. In the event that Dundon learns of additional connections not reflected in the Dundon Declaration, Dundon will use reasonable efforts to promptly file a supplemental declaration.

COMPENSATION OF DUNDON

19. **Consulting Services.** The terms of the employment of Dundon provide generally that professionals within Dundon will undertake this representation at their standard hourly rates for all Consulting Services, and that Dundon will be reimbursed for reasonable and necessary expenses, subject to the 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.

20. The present hourly rates for professionals of Dundon are set forth in the Dundon Declaration. The hourly rates are subject to periodic adjustments to reflect economic and other conditions and to reflect increases in professional expertise and experience. Dundon will advise the Committee, the Debtors and the U.S. Trustee of any increases in its hourly rates.⁴

21. Dundon will also seek reimbursement for reasonable and necessary expenses incurred, which may include travel expenses, work-related meals, and other out-of-pocket expenses incurred in providing professional services to the Committee. Dundon will charge for these out-of-pocket expenses at cost to Dundon and in accordance with the Bankruptcy Rules and the Local Rules. Non-working travel time will be billed at 50% of a professional's standard hourly rate.

22. **Transaction Services.** In addition to the hourly fees set forth above in connection with the Consulting Services, Dundon will earn the following contingent fees as follows in connection with the Transaction Services:

- a. **DIP Financing Fee.** Upon the consummation of each DIP Financing (the "**DIP Financing Transaction**") from a party who, or whose affiliates or predecessor, Dundon so introduced, Dundon shall earn, and the Debtors shall pay immediately and directly from the gross proceeds of such DIP financing, as a cost of such DIP financing, a cash fee equal to one percent (1%) of the gross proceeds of any such DIP Financing placed with a counterparty first introduced by Dundon ("**DIP Financing Fee**").
- b. **Exit Transaction Fee.** Separate from and addition to any DIP Financing Fee, upon the consummation of each Exit Transaction (as defined above), Dundon shall earn, and the Debtors shall pay immediately and directly, a transaction fee ("**Exit Transaction Fee**" and, with the DIP Financing Fee, the "**Transaction Fees**") upon the closing of such a transaction with a party who, or whose affiliate or predecessor, Dundon so introduced, (an "**Exit Transaction**") of (i) two percent (2.0%) of the gross proceeds of any senior secured indebtedness raised or committed excluding debtor-in-possession financing, (ii) 2.5% of gross proceeds of any indebtedness raised or committed that is secured by a lien (other than first lien), is unsecured and/or is subordinated, (iii) 5.0% of the gross proceeds of all equity or equity linked securities placed or committed, (iv) 5.0%

⁴ Such rate increases generally occur on or about July 1 of each year.

of the gross proceeds of any litigation funding raised or committed, and (v) 5.05% of the gross proceeds of the purchase of any assets.

23. For the avoidance of doubt, any time spent by Dundon on Transaction Services that could earn Dundon a Transaction Fee (DIP Financing Fee or Exit Transaction Fee) will not be subject to Dundon's hourly rates set forth above. In addition, Dundon is not seeking approval of any DIP Financing Fee or Exit Transaction Fee as part this Application. However, Dundon will seek approval of such fees at a later time.

24. The Transaction Fee structure is consistent with and typical of compensation arrangements entered into by other comparable firms in connection with the rendering of similar services under similar circumstances. Dundon's potential DIP Financing Fee is equal to the DIP financing fee which may potentially be charged by B. Riley, the Debtors' proposed restructuring advisor. *See* Docket No. 131. Both of Dundon's potential DIP Financing Fee and Exit Transaction Fee are reasonably and market-based to fairly compensate Dundon for its work. The Committee believes that the fee structure is in fact reasonable, market-based, and designed to fairly compensate Dundon for its work and to cover necessary and reasonable expenses.

NOTICE

25. 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 this 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

26. 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 Dundon as its financial advisor 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

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.*

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

In re:

Apple Tree Life Sciences, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-12177 (LSS)

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 DUNDON ADVISERS LLC AS FINANCIAL ADVISOR 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 (the “Debtors”), by and through its undersigned proposed counsel, 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 Dundon Advisers LLC as Financial Adviser 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 Honorable Laurie S. Silverstein at the Bankruptcy Court, 824 N. Market Street, 6th Floor, Courtroom No. 2, Wilmington, Delaware 19801.

¹ 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.

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 N. 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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*Proposed Counsel to the Official
Committee of Unsecured Creditors*

EXHIBIT A

Dundon Declaration

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

In re:

Apple Tree Life Sciences, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-12177 (LSS)

**DECLARATION OF MATTHEW J. DUNDON
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 DUNDON ADVISERS LLC AS FINANCIAL ADVISOR TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF JANUARY 23, 2026**

Matthew J. Dundon hereby declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a principal of the financial advisory firm Dundon Advisers LLC (“Dundon”), which maintains its main office at 10 Bank Street, Suite 1100, White Plains, NY 10606.

2. This 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 Dundon Advisers LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of January 23, 2026* (the “Application”).²

¹ 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.

² Capitalized terms used and not otherwise defined herein shall have the meanings ascribed to them in the Application.

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 Dundon's completion of further analysis or as additional information becomes available to it, a supplemental declaration will be filed with the Court.

Dundon's Disinterestedness

4. In connection with its proposed retention by the Committee in the Chapter 11 Cases, Dundon researched its client database to determine whether it or its affiliates have relationships with any of the entities or persons that were identified to Dundon 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").

5. To the extent such a search indicated that Dundon 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 Dundon's relationship with such parties are set forth on Schedule 2 annexed 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, Dundon determined that it has no connections with the Debtors, creditors of the Debtors, their respective attorneys and accountants, the U.S. Trustee or any person employed in the Office of the U.S. Trustee or Judges for the United States Bankruptcy Court for the District of Delaware (and certain staff members) over the last three (3) calendar years, except as set forth above or on Schedule 2 hereto.

7. Based on the results of Dundon's analysis, and except as otherwise disclosed herein, Dundon does not hold or represent any interest adverse to the Committee, the Debtors or its estate in connection with the matters for which Dundon is to be employed.

8. To the best of my knowledge, information and belief after reasonable inquiry, Dundon is disinterested within the meaning of section 101(14) of the Bankruptcy Code, in that neither I, Dundon, nor any of its professionals:

- (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 estate 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.

Dundon’s Rates and Billing Practices

9. **Consulting Services.** In connection with the Consulting Services, Dundon 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 Dundon. The professionals primarily responsible for advising the Committee and their current standard hourly rates are:

<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>
Matthew Dundon	Principal	\$1,090.00
Joshua Nahas	Managing Director	\$960.00
Gary Lipson	Senior Advisor	\$960.00
Christopher Podesfinski	Associate Director	\$650.00
Christopher Kazantzis	Associate	\$350.00

10. In addition, additional professionals may be involved as necessary and appropriate to advising the Committee. The current rates of Dundon professionals are as follows:

<u>Title</u>	<u>Standard Hourly Rate</u>
Principal	\$1,090.00
Managing Director	\$960.00
Senior Advisor	\$960.00
Senior Director	\$850.00
Director	\$755.00
Associate Director	\$650.00
Senior Associate	\$495.00
Associate	\$350.00

These rates are subject to change in accordance with Dundon billing practice and procedures. Dundon will advise the Committee, the Debtors and the U.S. Trustee of any increases in its hourly rates.³

11. **Transaction Services.** Separate from Dundon's hourly rates for Consulting Services discussed in more detail in the Application, Dundon may earn Transaction Fee(s) for services in relation to DIP Financing Transactions and/or Exit Transactions as more fully set forth in the Application.

12. Dundon's DIP Financing Fee is equal to and not duplicative of the DIP financing fee potentially charged by the Debtors' restructuring advisor⁴ and all potential Transaction Fees (including DIP Financing Fees and Exit Transaction Fees) are reasonable and market-based to fairly compensate Dundon for its work.

13. Dundon does not intend to apply for, and shall not accept, any hourly fees for services which do, or which if it successful could have, resulted in the acceptance and payment of a Transaction Fee.

³ Dundon generally increases its rates on or about July 1 of each year.

⁴ See Docket No. 131.

14. The fee structure is consistent with and typical of compensation arrangements entered into by other comparable firms in connection with the rendering of similar services under similar circumstances.

15. In addition, it is Dundon's policy to charge its clients for all out-of-pocket expenses incurred related to its services. The expenses charged to clients include travel expenses, work-related meals, and other out-of-pocket expenses incurred in providing services to the Committee. Dundon will charge for these out-of-pocket expenses at cost to Dundon and in accordance with the Bankruptcy Rules and the Local Rules. Non-working travel time will be billed at 50% of a professional's standard hourly rate.

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

17. Dundon, as proposed financial advisor to the Committee, will report directly to the Committee. During the course of these Chapter 11 Cases, Cole Schotz and Dundon will reasonably coordinate 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
Salt Lake City, Utah

/s/ Matthew J. Dundon
Matthew J. Dundon
Principal
Dundon Advisers LLC

SCHEDULE 1

List of Potential Parties of 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

IPassword
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

**Bankruptcy Judges, Court Staff, and
Clerk of Court for the District of Delaware**

Chief Judge Karen B. Owens
Judge John. T. Dorsey
Judge Craig T. Goldblatt
Judge Thomas M. Horan
Judge Brenden L. Shannon
Judge Laurie Selber Silverstein
Judge Kate J. Stickles
Judge Mary F. Walrath
Al Lugano

Amanda Hrycak
Cacia Batts
Claire Brady
Danielle Gadson
Demitra Yeager
Jill Walker
Laura Haney
Laurie Capp
Lora Johnson
Marquietta Lopez
Nickita Barksdale
Nikki Washington
Paula Subda
Rachel Bello
Stephen L. Grant
Xavier Hunt

Staff of the Office of the United States

Trustee, Region 3

Andrew R. Vara
Benjamin Hackman
Christine Green
Denis Cooke
Diane Giordano
Dion Wynn
Edith A. Serrano
Elizabeth Thomas
Fang Bu
Hannah M. McCollum
Holly Dice
James R. O'Malley
Jane Leamy
Jonathen Lipshie
Jonathen Nyaku
Joseph Cudia
Joseph McMahan
Juliet Sarkessian
Lauren Attix
Linda Casey
Linda Richenderfer
Micheal Panacio
Nyanquioi Jnoes
Ramona Harris
Richard Schepacarter
Rosa Sierra-Fox
Shakima L. Dortch

Timothy J. Fox, Jr.

Debtor Board Members

Bob Hugin
Edmund Graziani
Joseph Yanchik
Laura Forese
Loren Walensky
Margaret Bigelow
Mark Mitchnick
Matthew Jacobson
Meenu Chhabra Karson
Neena Kadaba
Paul Eisenberg
Seth Harrison
Spiros Liras
Tanja Kortemme

Debtor Officers

Lawrence Lum
John Reilly

**Non-Debtor Portfolio Company Directors
and Officers**

Andrew Geall
Ankeet Jethwa
Anna Batarina
Antoine Papiernik
Aron Knickernocker
Brian Shoichet
Christopher Rader
David Lewis
Dennis Langer
Doug Godshall
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
Zack Scott
Zhen Su

Debtors' Professionals

B. Riley Restructuring Services, LLC
Grant Thornton, LLP
Murphy & King
Potter Anderson & Corroon LLP
Quinn Emanuel Urquhart & Sullivan, LLP
Verita
Walkers Global

Ordinary Course Professionals

Covington & Burling LLP
DiFilippo Corporate Finance Group
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

Management Debtors Top 20 Unsecured Creditors

Belay Solutions, LLC
Chelsea Technologies LLC
Cogent Communications, LLC
Echelon Fine Printing
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

Aaron Kantoff
Anna Batarina
Danjie (Eva) Zhou
David McIntyre
Hamade Family Trust (dated 6/18/2003)
Jonathan Waldstreicher
Julie A. Gionfriddo
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

1Life Healthcare Inc.
9375-3408 Quebec Inc.
ADP, Inc
Amnet Systems LLC
Apple Tree Life Sciences, Inc.
Aptar Congers
Arthur J. Gallagher Risk Management Services, Inc.
Aruna K. Subramanian
Ascidian Therapeutics, Inc.
ATP Research and Development, Inc.
Bachem Americas, Inc.
Bay Valuation Advisors, LLC
BDO USA, LLP
Bend Financial, Inc.
Bill.com
Blue Cross Blue Shield
Boston Industries, Inc.
Brex
Browne Consulting Group
Cambridge Biolabs
Cambridge Trust
Cameron Wolfe

CD Chunn & Associates, Inc.
Charles River Laboratories, Inc.
Chien-Te Kent Tseng
Colorado State University
CPC Scientific, Inc.
Creative Biolabs Inc.
Credit Card Misc.
CT Corporation
Custom NMR Services, Inc.
Cytel Inc
Davey Smith
Delaware Secretary of State
Digital Insurance LLC
DocuSign, Inc.
Ea Spry Co. Inc.
eCtd Publishing LLC
Eric Smith
Eurofins Panlabs Discovery Services Taiwan, Ltd.
Eurofins Panlabs Inc
Eva Garland Consulting
EyeMed
Fragomen, Del Ray, Bernsen & Loewy, LLP
Franchise Tax Board
Gyros Protein Technologies
Halloran Consulting Group
Hansol Jang
Human Predictions LLC
ImQuest BioSciences
InCSD, LLC
Integral Molecular, Inc.
Intuit
IVEK Corporation
Janet Nogleby
John George McHutchison
JTR & Associates, LLC
K P'Das Bio-Consulting
KOC Consulting, LLC
Kyinno Biotechnology Co., Ltd.
Larry Smith
Latham BioPharm Group
LinkedIn Corporation
Loxley LLC
Lyrica Therapeutics, Inc.
M3 USA Corporation
MED Regulatory & Toxicology Consulting,

LLC
 Medizinische Universität Innsbruck
 Meeting Protocol Worldwide LP
 Meeting Protocol Worldwide LP-1
 Microbiologics
 NAGASE Specialty Materials NA LLC
 Nanopharm Ltd.
 Nanopharm Ltd. – USD
 Next Breath
 Organix
 Peak Scientific Inc.
 Pentagram Design Inc.
 PPD Development, LP
 ProPharma Group LLC
 Protein Technologies, Inc.
 Prudence Ciardullo
 PurePEG, LLC
 Quality Compliance Partners, Inc.
 Raphael J. Landovitz
 Retrovirox Inc.
 RG Supply Chain Consulting Inc
 Ron Moss
 Shelterpoint
 Shyam Kottilil
 Sigmovir Biosystems Inc.
 Sino Biological US Inc.
 Solium Capital LLC
 Southern Research Institute
 Spences Services LLC
 Sterling Corporation
 Sun Life
 The Agency Worldwide
 The Catalytic Agency, LLC
 Tremaine DMPK Consulting, LLC
 True North Biopharm LLC
 TS Pharma Experts LLC
 Tufts Biolabs
 University of Tennessee Health Science
 Center
 Uppsala Monitoring Centre
 Utah State University, Institute for Antiviral
 Research
 V4Scientific
 Vascumab LLC
 Vectura Ltd.
 ViraTree LLC

Vivitide
 Waters Technologies Corporation
 World Courier Inc
 World Customs Brokerage Inc
 WuXi AppTec (HongKong) Limited
 YIN HTWE
 Zahra Fathi

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

Airgas USA, LLC
 Armanino Advisory LLC
 BDO USA LLP
 CAS Chemical Abstract Services, Inc.
 Curia Global, Inc.
 Diamond Age Data Science LLC
 Fisher Scientific Company, LLC
 Forkable
 Formulatrix LLC
 Life Technologies Corporation
 Mettler-Toledo Rainin, LLC
 NexusCW Inc
 Pegasus Purchaser, Inc.
 Pharmaron, Inc.
 Promega Corporation
 ProteinSimple Checking BIN #39
 Stemcell Technologies Inc
 Tecan U.S. Inc
 VWR International, LLC

Initial Therapeutics, Inc. Equity Holders

Alexander McCampbell
 Brain Paegel
 Brooke Olsen Blair
 Danielle Carino
 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 5/11/2012)
 Margot Paulick
 Mariwil Wong

Matthew Jacobson
 Micheal Ehlers
 Mohan Sivaraja
 Mohit Trikha
 Neena Kadaba
 Peiwen Yu
 Peter DiLaura
 Phil Patten
 Rachel Green
 Rajesh Chopra
 Sarah Smith
 Spiros Liras
 Stephanie Maiocco
 Xiaoyue (April) Chen

Initial Therapeutics, Inc., Creditors

1Life Healthcare, Inc.
 201 Spear Street
 AA BLOCKS, LLC
 AABC Testing & Certification
 AACR
 ABBEXA
 Abcam, inc.
 AC Hotel
 AC Lab Instruments
 Ace Parking
 Acrotien ChemBio Inc
 ACTenviro
 Adobe
 ADP
 Agilent Technologies, Inc.
 AIR-TITE Products Co., Inc.
 AK Scientific, Inc.
 Alaska Airlines
 Alex's Mobile Notary Public Services
 Alitheia Genomics SA
 Allucent US LLC
 Alpha Teknova, Inc.
 Amami San
 Amaresh Keleta
 Amazon
 Amazon Business Prime
 Amazon Capital Services, Inc.
 Amazon Web Services
 Ambeed, Inc.
 American Association for Cancer Research

American Chemical Society
 American Type Culture
 American Type Culture Collection
 Amith Vikram Rangarajan
 Amoura Resturant
 Ampersandpeople inc
 Anecdote
 Anirban Datta
 Ann MacLaren
 Antibodies Inc.
 AnytimeLabTrader, LLC
 Aon Consulting, Inc. (NJ)
 Apconix Ltd.
 Apertor Pharmaceuticals Inc.
 Apexbio Technology LLC
 Apicells Inc.
 Are Café Resturant
 Arthur Dean Olson (Dean Olson Patent
 Consulting)
 Arthur J. Gallagher Risk Management
 Services, Inc.
 Asana
 ASCO
 AstaTech Inc.
 Astrill VPN
 ATCC
 ATP Research and Development, Inc.
 Atum
 Aurigene Pharmaceutical Services, Ltd.
 Avanan
 Aviva Systems Biology
 Axis Enterprises Inc.
 Axis Promotions
 Azenta US, Inc.
 Backhaus
 BambooHR
 Baskin-Robbins
 Bay Valuation Advisors
 Bayshore Safety & Industrial Supplies
 BCBS
 Beckman Coulter, Inc.
 Becton, Dickinson & Co.
 Bend Financial
 Biocom California
 BioDuro LLC
 BioIVT

BioLegend	Chemical Computing Group
BioProcedure	Chemrus Inc.
Bio-Rad Laboratories, Inc.	Che,scene Limited Liability Company
Biospace	Chemtos LLC
Biotage, LLC	Chico Marx
Biotech Equipment Sales, Inc.	Chipotle Online
Bio-Techne Sales Corporation	Christine Matthews (now Digital Insurance)
Bliss Pops	Christos Tzitzilonis
Blossom Flower Deliver	Chwen Cheng Chen
Blue Bottle Coffee	Cintas Corporation (AZ)
BMG LABTECH, Inc.	City of Burlingame
Bordelon Marine	City of Sm Pw Parking
Boster Biological Technology	City of South San Francisco
Box, Inc.	City of Ssf Permit Dept
BPS Bioscience Technology	Clarke Consulting
Brady Worldwide Inc	Clarke S1 Sirn
Brex Card – Expensify Linked	Clipper
Brian Benjamin Tuch	CLSA
Bridge Bank	CAN
Broken Yolk Café	Collaborative Drug Discovery, Inc.
Bronwyn Sanders	Combi-Blocks Inc.
Browne Consulting Group	Computer Care
BUTCHER’S CUT	Copyright Clearance Center
Cable 55	Corovan Moving & Storage Co.
Caffe Central	Costco
Caffe Centro	Creative Biogene, Inc.
California Chamber of Commerce	Creative Biolabs, Inc.
California Franchise Tax Board	Credit Card Misc.
California Pizza Kitchen	Crossmint Pending
Cambridge Healthtech Institute	Crown Bioscience Netherlands BV
Cancer Research Institute	Crown Bioscience, Inc.
CC My Admin LLC	Crown Worldwide Moving and Storage, LLC
CDW LLC	CSC
Celine Calalang	CSC Leasing CO
Cell Culture Company	Cshl Meetings & Courses
Cell Signaling Technology, Inc.	CT Corporation
Certara USA, Inc.	Culligan
Certified GeneTool, Inc.	Culligan Water
Champions Oncology, Inc.	Curia Bio Inc. (dba Lake Pharma)
Charles Kreider (Kreider Consulting)	Cursor
Charles River Laboratories	CVS Pharmacy
Chase Luck Bakery	Daicel Chiral Technologies
Checkr	Danae Inc.
ChemAxon	Daniel W Pierce
ChemExplorer Company LTD	Data Kable Technology Inc
Chemglass Life Sciences	Dataworks Development Inc

DC3 Therapeutics, LLC
 De Novo Software
 Dead Eye Coffee Bar
 Dean W. Felsher
 Deep Apple Therapeutics, Inc.
 Delaware State
 DeNoix Inc
 DHL
 Diaago LLC
 Dice Molecules SV, inc.
 Divisadero Florist
 DocuSign
 Dojindo Molecular Technologies, Inc.
 Dollar Tree
 Donald Schmidt Jr.
 DoorDash
 Dorothy Rachel Green
 Dotmatics, LLC
 Dragonfly Design Group
 Drug Design Group
 Easy Learning Incubator LLC
 EasyLlama
 Eataly
 eBay
 EDITCO BIO INC.
 Edward M. Driggers
 Eirna Bio Ltd
 Embassy Suites by Hilton
 EMD Millipore Corporation
 Emily Lin Karbarz
 eMolecules, Inc.
 Enamine US Inc.
 Endpoints
 Envoy
 Eppendorf North America Inc.
 Esposto's Catering
 Esquire
 Esraa Mohamed
 Etsy
 Eurofins Cerep SA
 EUROFINS DISCOVEREX CORP
 Eurofins Panlabs Inc.
 EventCreate
 Express Parking
 Extra Space Storage
 EyeMed
 ezCater
 Ezcater Ruse Woodfire
 Farley's
 FedEx
 FlowJo LLC
 Fragomen, Del Ray, Bensen, & Loewy, LLP
 Frontage Laboratories, Inc.
 Frontier Scientific Services Inc.
 Fuchunju
 FUJIFILM Wako Chemicals U.S.A.
 Corporation
 G&P Biosciences LLC
 Galen Laboratory Supplies LLC
 GarboBio Inc. (AcceGen)
 Gary F. Musso
 Gaslamp
 GeneCopoeia, Inc.
 Genesee Scientific Corporation
 GenScript USA, Inc.
 Gifford Bioscience Ltd
 Github
 GlobalData
 GoDaddy
 Gordon Rees Scully Mansukhani, LLP
 Grainger Industrial Supply
 Grant Park Bistro
 GraphPad
 Greenhouse Software, inc.
 GroupGreeting
 GS Pharma Solutions, LLC
 Hamamatsu Corporation
 Headline Pa
 Herb N' Kitchen
 High Flying Foods
 Hilton Hotels
 HL Peninsula
 HoneyBaked Ham
 Horizon Discovery Biosciences Ltd
 Hyatt
 Ichika Sushi House
 IKA-WORKS, Inc.
 IKEA
 Il Fornaio
 Illumina, Inc.
 Impark
 India Quality Restaurant

Indian Clay Pot
Instacart
Integra Biosciences Corporation
Integrated DNA Technologies, Inc.
Integrative Drug Discovery ULC
Intuit
Invested Digital Group, Inc.
IQ Proteomics, LLC
Jack in the Box
Jackie McGrath Inc.
Jeff Hsu
Jena Bioscience GmbH
Jennifer Rocnik
Jessamyn Wead
Jetbrains Americas, Inc.
Jim Li
JMP Group Inc.
John Hood
Jonathan R Wong dba Enigma Search
Solutions LLC
Joesph M. Llovet
Joesph Fan
Julius Khoo, Consultant
K.F. Howell Electric, Inc.
Kai Fa Qu Xi Lai Deng Jiu
Kenneth B. Wlasichuk
Kim F. McClure (Kb Pharma Consulting,
LLC)
Klein Hersh International
Kristina Leandra Harter
Kristine Anne Gordon
Laurie L. LeDoux
LAZ Parking
Leibniz-Institut DSMZ-Deutsche Sammlung
von Mikroorganismen und Zellkulturen
GmbH
Lenovo Group
Letterman Digital Arts
LifeSpan Biosciences, Inc.
Lonza Walkersville, Inc.
Lowe's
Lucid Software
Luke's Lobster
Marriott
Marshall Scientific LLC
Martin S. Linsell

Maruzen International Co., Ltd.
Matphil Technologies, Inc. dba Pipette.com
McCormick Place
McMaster-Carr Supply
McNeill Baur PLLC
Meaghan An
MeCour Temperature Control, LLC
MedChemExpress LLC
Mercury Business Services LLC
Meso Scale Diagnostics, LLC
Metrion Biosciences Ltd.
Mzez Greek Fusion
Microsoft Office Azure
Microsoft Store
Miller & Lux Restaurant
MingHin Cuisine
Molecular Devices, LLC
MongoDB
Monnit Corporation
Moravek Biochemicals, Inc.
Morrow Service, Inc.
Mosaic Networx, LLC
Murigenics, Inc.
Murphy & King
MyBioSource, Inc.
NanoImaging Services, Inc.
Nanosyn, Inc.
National Screening Services LLC
Nationwide Screening Services
Nespresso
New England Biolabs
Nicholas Galli
Niu B
NorCal Water
Nothing Bundt Cakes
Novogene Corporation Inc.
NovoPro Bioscience Inc.
Novus Biologicals, LLC
Nuaire
NXT Power, LLC
Occupational Health Centers of North
Carolina, P.C.
Okta, Inc
OLIVAS MEXICAN FOOD
On The Roll Catering and Events
One12

OneDigital Topco LLC (Digital Insurance LLC)	Riposo Mobile
OpenAI	Road Master Club
Optibrium Limited	Ronnie-Ray Abriam Orpilla
OriGene Technologies, Inc.	Rosemarie O'Shea
Osteria Panevino	RStudio
Palace Hotel Dining	Rudra Nand
Panera Bread	Russell Reynolds Associates, Inc.
Parking – SF	Sab Lai Thai Kitchen
Parr Instrument Company	Samuel Munroe
Pbss	San Diego Convention Center
Penske Truck Rental	San Francisco Baking Institute
PerformYard, Inc.	San Francisco International Airport
Peter DiLaura	San Mateo County
Pharmablock (USA), Inc.	San Mateo County Tax
Phenomenex, Inc.	Santa Cruz Biotechnology Inc
Pingyu Ding	Sartorius Corporation
Pizzeria Delfina	SBC Worldwide, LLC
Plasmidsaurus Inc.	Schrodinger, LLC
Posit Software, PBC	SciSummary
Postal Annex	Secretary of State California
Prendio LLC	See's Candies
Pressed Café	Seismic Installations
Prestige Lens Lab	Selleck Chemicals LLC
PricewaterhouseCoopers LLC	Sensitech Inc.
Primordium Labs	Sentinel
Prince Scientific LLC	Seqmatic LLC
Profcontrol GmbH	SFMTA Parking
Pronto!	Shanghai Chempartner Co., Ltd.
Proteintech Group, Inc.	Sheridan Books
Qiagen LLC	Shisan Fan Sushi and Chinese Restaurant
Quintara Discovery, Inc.	Shred City
R&D Systems, Inc.	Sigma-Aldrich, Inc.
Rachel Kindt	Signal Solutions Corporation
Ramen Hero	Silicon Valley Corporate Relocation
RayBiotech	SL 2T, LLC (SmartLabs)
RC TRITEC AG	Slack
Regents of the University of CA, Irvine	Slidexpress PVT LTD
Remarkable	SmartSign
RevMab Biosciences USA, Inc.	SnapGene
Revvity Health Sciences, Inc.	SNPsaurus
Revvity Signals Software, Inc.	Solium Plan Managers LLC
Rhino Networks	Soloprotect US
Ribomaps LTD	SPRO
Ricky P Jones	Stanford University
RIPOSO	Staples
	Staples Advantage

Starbucks
 Stella Alpina Osteria
 Stericycle, Inc.
 Steven A Smith
 Steven J. Freedman
 Steven R. Sando
 Strategic Spaces
 Subscription Cc Auth
 Sun Life Financial
 Surplus Solutions LLC
 Susan Lyman
 Susanne Steggerda
 Swagelok Northern California
 Synthego Corporation
 System Biosciences
 TAQUERIA LAS PENCAS
 Target
 Tastes On The Fly
 Tax1099
 TeamViewer
 Technical Safety Services, LLC
 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
 Traverse
 TriLink Biotechnologies, LLC
 Trip.com
 Triton Appliance Repair
 Uber
 Uline, Inc
 United

Unity Biotechnology
 University of California, San Diego Small Molecule X-ray Crystallography Facility
 UPS Supply Chain Solutions, Inc.
 Urban Kitchen
 USA Scientific, Inc.
 USPS
 Vector Laboratories, Inc.
 Veloxee
 Vincor Tech
 Vistaprint
 W.B. Mason Company, Inc.
 W.W. Grainger, Inc.
 Waterco of California
 Wave
 Wave Rock
 West Coast Chemistry Services
 White Elephant Restaurant
 Whole Foods Market
 Wise Guys Events
 WPP Group USA, Inc. dba Ogilvy Health
 WTMR
 WuXi AppTec (Shanghi) Co., Ltd.
 Yi Chao Fan
 Yummy Home Plate
 Zachary Sweeney (Edgewood Scientific Consulting)
 Zazzle
 Zoom Video Communications, Inc.
 Zotero
 Zymo Research Corporation

Marlinspike Therapeutics, Inc. Top 20 Unsecured Creditors

Advion, Inc.
 Air Systems Technologies Inc
 Aurigene Pharmaceutical Services LTD
 Baylor College of Medicine
 BDO USA, LLP
 BioProcure, Inc.
 Biotech Law Center, Inc.
 Browne Consulting Group
 Crown Castle International Corp.
 CSC Leasing Co
 Digital Insurance, LLC
 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
Joesph Yanchik
Kristen Karlin
Paul Da Silva Jardine
Rajesh Chopra
Thomas Westbrook
Victor Rusu

Apertor Pharmaceuticals, Inc., Top 20 Unsecured Creditors

1640 South Loop Road LLC c/o Paceline
Investors LLC
Alameda County Tax Collector
Benchling, Inc.
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

Life Healthcare, Inc.
Abcam, Inc.
Abmole Bioscience Inc.
Abwiz Bio Inc
Access Plants LLC
Adams & Chittenden Scientific Glass
ADP
Advanced Chemical Transport
Agilent Technologies, Inc
AK Scientific, Inc.
Alameda County Environmental Health
Amazon Capital Services
Amazon Web Services
Ambeed Inc.
AmiD Biosciences LLC
AnaSpec Inc.
Apple Tree Life Sciences, Inc.
Applied Chemistry Solutions
Applikon Biotechnology, Inc.
Arash Samadi
Arthur J. Gallagher Risk Management
Services, Inc.
ATCC
Atlas Copco Compressors LLC
ATP Research and Development, Inc.
Avanan, Inc

AxisPharm	Cole-Parmer Instrument Company, LLC
Azenta US, Inc.	Collaborative Drug Discovery, Inc.
Bay Air Systems	Combi-Blocks Inc.
Bay Valuation Advisors, LLC	Comcast
BCBS MA	Commonwealth of Massachusetts
BDO USA, LLP	ComputerCare, LLC
Becton, Dickinson and Company	Cooley LLP
Bend Financial, Inc.	Copyright Clearance Center, Inc.
Bill.com	CozChemix Limited
Bio Basic Inc.	Creative Bioarray
bioauxilium	Creative BioMart Inc.
Biocair Inc	Credit Card Misc.
BioLegend, Inc.	CT Corporation
Biomatik Corporation	CTK Instruments LLC
BioPharmics LLC	Data Kable Technology Inc
Bio-Rad Laboratories, Inc.	Dean Olson Patent Consulting LLC
Biotage LLC	Demetrix, Inc.
BiotechnologyJobs	Denisse Martinez
Biozilla, LLC	Diaago LLC
Bordelon, Inc dba Ben's Dry Ice	Diego Garrido Ruiz
Boston BioProducts, Inc.	Discovery Life Sciences
BPS Bioscience, Inc.	Discovery Scientific Solutions LLC
Brex	Diversified Laboratory Repair, Inc.
BroadPharm	Dragonfly Design Group, Inc.
BUCHI Corporation	E-Control Systems, Inc.
California Fire Detection	Elson Electric
California Life Sciences	Epoch Life Science, Inc.
Carvill Consulting	Eppendorf North America, Inc.
Cayman Chemical Company Inc.	Esco Technologies, Inc.
CC My Admin, LLC	EyeMed
CDW Direct, LLC	Fahim Syed
Cell Biolabs, Inc.	FedEx Freight
Charles River Discovery Research Services	First Choice Coffee Services
UK Limited [GBP]	Fisher Scientific
Charles River Discovery Research Services	Flowjo, LLC
UK Limited [USD]	Fortis Life Sciences fna Bethyl Laboratories
Charles River Laboratories Cell Solutions, Inc.	Foxx Life Sciences, LLC
Chemglass Life Sciences, LLC	Fragomen, Del Ray, Bernsen & Loewy, LLP
Chemical Computing Group	FUJIFILM Wako Chemicals U.S.A. Corporation
Christian Puccetti	Genesee Scientific Corporation
Chun Li	Genewiz, LLC
Cintas Corporation	Genprice Inc.
Clarivate Analytics (US) LLC	GenScript USA Inc.
Clark + Elbing LLP	Gentige USA Sales, LLC
CNA	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.
 Naomi Jareily Ruvalcaba
 National Institute of Technology and
 Evaluation
 Nationwide Screening Services
 NBS Scientific, LLC
 NCS Moving Services
 Nefeli Chanoutsis
 Neil Vasani
 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 Yarar
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 Dundon Retention Application

- Dundon Advisers receives payment card services from JP Morgan Chase in the ordinary course of their respective businesses.
- Dundon Advisers receives payroll and employee benefits services from ADP in the ordinary course of their respective businesses.
- Dundon Advisers receives cloud document services from DocuSign in the ordinary course of their respective businesses.
- Dundon Advisers receives insurance services from ShelterPoint in the ordinary course of their respective businesses.
- Dundon Advisers receives cloud, productivity, messaging, market intelligence and recruiting services from Microsoft and its business units (including LinkedIn) in the ordinary course of their respective businesses.
- Dundon Advisers receives travel services from Hyatt, Marriott and its business units (including AC Hotels), Hilton and its business units (including Embassy Suites), Trip.com, Uber, United Airlines, and Alaska Airlines in the ordinary course of their respective businesses.
- Dundon Advisers receives video and teleconference services from Zoom in the ordinary course of their respective businesses.
- Dundon Advisers receives courier services from UPS in the ordinary course of their respective businesses.
- Dundon Advisers receives courier and mail services from USPS in the ordinary course of their respective businesses.
- Dundon Advisers receives office supplies and other goods from Amazon and its affiliates (including Whole Foods), CVS, DoorDash, WB Mason and Costco in the ordinary course of their respective businesses.
- Dundon Advisers receives generative AI / LLM services from OpenAI in the ordinary course of their respective businesses.
- Dundon Advisers receives online accounting services from Intuit in the ordinary course of their respective businesses.

- Dundon Advisers purchases computer hardware from Lenovo in the ordinary course of their respective businesses.
- Dundon Advisers receives employee benefits services from Anthem BCBS in the ordinary course of their respective businesses; Dundon Advisers is not aware if the “Blue Cross Blue Shield” with whom the Debtors have a connection is Anthem BCBS.
- Dundon Advisers receives commercial banking services from Western Alliance in the ordinary course of their respective businesses.
- Dundon Advisers receives news services from The New York Times in the ordinary course of their respective businesses.
- Dundon Advisers receives courier and printing services from FedEx in the ordinary course of their respective businesses.
- A Dundon Advisers professional Jack Poynter was formerly employed by Citizens Bank. During such employment he was not involved in services for any of the Debtors, and he has no residual compensation interest in any interest Citizens Bank may hold in these Chapter 11 cases.
- Dundon Advisers and/or senior members of its staff, not in their respective individual capacities, but solely as fiduciaries in matters unrelated to these Chapter 11 cases, has engaged for services each of the following: Western Alliance Bank, Verita, Potter Anderson & Corroon, Grant Thornton, Proskauer Rose, Dechert, BDO, Amazon, CT Corporation, CSC, Intuit, Cooley, and US Bank.
- Dundon Advisers engaged Cole Schotz for transactional advice in a since-concluded engagement unrelated to these Chapter 11 Cases. Dundon and/or certain of its senior professionals, not in any individual capacity, but solely as fiduciaries, have engaged Cole Schotz as counsel in matters unrelated to these Chapter 11 Cases.

EXHIBIT B

Committee Declaration

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

In re:

Apple Tree Life Sciences, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-12177 (LSS)

**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 DUNDON
ADVISERS LLC AS FINANCIAL ADVISOR 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 (the “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 in support of the Committee’s application (the “Application”)² seeking authorization to retain Dundon Advisers LLC. (“Dundon” or the “Firm”) as its financial advisor pursuant to sections 328(a) and 1103(a) 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

¹ 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.

² Capitalized terms not defined herein shall have the meanings ascribed to them in the Application.

States Bankruptcy Court for the District of Delaware (the “Local Rules”). Except as otherwise noted, I have personal knowledge as to all of the information set forth below.

Identity of Declarant

3. 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.

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

Steps Taken to Ensure the Comparability of Engagement Terms

5. Dundon has informed the Committee that its rates for bankruptcy services are comparable to the rates Dundon charges for non-bankruptcy services, and that Dundon endeavors to set its hourly rates for professionals at levels competitive to those charged by peer firms.

6. After interviewing Dundon, the Committee found Dundon to be qualified for the present engagement. As described in the Application, the Committee selected Dundon as its financial advisor because of its extensive experience assisting, advising, and providing strategic advice to creditors and other entities in numerous chapter 11 cases of similar size and complexity to these Chapter 11 Cases. Dundon’s professionals have provided restructuring and financial advisory services in numerous large cases across the United States

Rate Structure

7. Dundon has informed the Committee that its hourly rates in connection with the Consulting Services are subject to periodic adjustments (typically effective on or about July 1 of each year) to reflect economic and other conditions.

8. Dundon has informed the Committee that its Transaction Fee structure is consistent with and typical of compensation arrangements entered into by other comparable firms in connection with the rendering of similar services under similar circumstances.

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

Procedures Established to Supervise Fees and Expenses and Manage Costs

10. The Committee recognizes that it is its responsibility to closely monitor the billing practices of its financial advisor to ensure that the fees and expenses paid by the estate remains consistent with the Committee's expectations and exigencies of these cases. The Committee will review the invoices submitted by Dundon throughout these Chapter 11 Cases.

[Remainder of Page Left Intentionally Blank]

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 its 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 Sciences, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-12177 (LSS)

**ORDER PURSUANT TO 11 U.S.C. §§ 328(a) AND 1103
AUTHORIZING AND APPROVING THE RETENTION AND EMPLOYMENT
OF DUNDON ADVISERS LLC AS FINANCIAL ADVISOR TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF JANUARY 23, 2026**

Upon the application (the “Application”)² 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 Dundon Advisers LLC (“Dundon”) as its financial advisor in connection with the Debtors’ chapter 11 cases (the “Chapter 11 Cases”) effective as of January 23, 2026, and upon the declaration of Matthew J. Dundon a principal of Dundon (the “Dundon Declaration”) and the declaration of Michael B. Dilling, solely in his capacity as Chairperson of the Committee (the “Committee Declaration”), and together with the Dundon Declaration, the “Declarations”); and it appearing that the professionals Dundon who will perform services on behalf of the Committee in the Chapter 11 Case are duly qualified to practice before this Court; and the United States District Court for the

¹ 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.

² Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Application.

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 the Court finding, based on the representations made in the Application and the Declarations, that Dundon does not represent any interest adverse to the Committee or the Debtor's estate 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 Debtor's estate; 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 Dundon as its financial advisor in these Chapter 11 Cases, effective as of January 23, 2026, pursuant to sections 328 and 1103 of the Bankruptcy Code, as contemplated by the Application and on the terms provided in the Application and the Dundon Declaration, and Dundon is authorized to perform the services set forth in the Application and in the Dundon Declaration, as may be modified herein.
3. For the avoidance of doubt, except to the extent set forth herein, Dundon's fee and expense structure relating to Dundon's Transaction Services is approved pursuant to section 328 of the Bankruptcy Code.

4. Dundon shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with these Chapter 11 Cases in compliance with sections 330 and 331 of the Bankruptcy Code for the Consulting Services and section 328 of the Bankruptcy Code for the Transaction services and shall also comply with the applicable provisions of the Bankruptcy Rules, Local Rules, and any other applicable procedures and orders of the Court.

5. Any time spent by Dundon on Transaction Services that could earn Dundon a Transaction Fee shall not be subject to Dundon's hourly rates.

6. Notwithstanding the preceding paragraphs, with respect to Dundon's Consulting Services, the compensation and fees and expenses to be paid to Dundon shall be subject to review under section 330 of the Bankruptcy Code, and with respect to Dundon's Transaction Services, the compensation and fees and expenses to be paid to Dundon, including without limitation, the DIP Financing Fee and Exit Transaction Fee, shall be reviewable under section 328 of the Bankruptcy Code; *provided, however*, that with respect to the Transaction Services, the U.S. Trustee shall retain the right to object to the compensation and fees and expenses paid to Dundon pursuant to the Application, based on the reasonableness standard provided for in section 330 of the Bankruptcy Code.

7. Dundon is entitled to reimbursement by the Debtors for reasonable expenses incurred in connection with the performance of its engagement pursuant to the Application, including without limitation, the reasonable fees, disbursements, and other charges of Dundon's counsel, in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, applicable orders of this Court, and the fee guidelines promulgated by the Office of the United States Trustee. Notwithstanding the foregoing, Dundon shall only be reimbursed for any legal fees or costs incurred in connection with these Chapter 11 Cases to the extent permitted under applicable law and the decisions of this Court; *provided, however*, Dundon

shall not seek reimbursement of any fees incurred defending any of its fee applications in these Chapter 11 Cases.

8. No amounts shall be paid to Dundon for fees related to Transaction Services absent an order of this Court approving a fee application filed on notice to parties in interest in these Chapter 11 Cases under the procedures set forth in any order establishing procedures for compensation and reimbursement of professionals (the “Interim Compensation Procedures”).

9. Dundon shall file fee statements with time entries and requests for reimbursement that comply with Bankruptcy Rule 2016 and the Local Rule 2016-1, except as expressly set forth in this Order, pursuant to the deadlines and other procedures specified for such fee statements under any order or procedures approved by this Court. Dundon shall be entitled to file and serve a fee statement (that otherwise complies with the Interim Compensation Procedures) immediately upon the consummation of a DIP Financing Transaction or Exit Transaction, with respect to any DIP Financing Fee or Exit Transaction Fee. For the avoidance of doubt, any portion of a DIP Financing Fee or Exit Transaction Fee subject to an objection filed with the Court shall not be payable to Dundon until such objection has been resolved.

10. In light of the Transaction Services to be provided by Dundon and the compensation structure set forth in the Application, solely with respect to the Transaction Services, Dundon and its professionals shall be excused from: (i) the requirement to maintain or provide detailed time records in accordance with Bankruptcy Rule 2016(a) and Local Rule 2016-1; and (ii) conforming with a schedule or hourly rates for its professionals. Instead Dundon shall maintain reasonably detailed time records in half hour (0.5) increments containing descriptions of the Transaction Services rendered for the Committee, and the individuals who provided those services, and will present such records together with its fee applications filed with this Court. For the Consulting

Services, Dundon shall maintain time records in accordance with Bankruptcy Rule 2016(a) and Local Rule 2016-1.

11. Dundon shall provide ten (10) business days' notice to the Debtor, 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.

12. Notwithstanding anything in the Application to the contrary, Dundon shall (i) to the extent that it uses the services of independent contractors or subcontractors (collectively, the "Contractors") in this case, pass through the cost of such Contractors at the same rate that Dundon 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 Dundon; and (iv) file with this Court such disclosures required by Bankruptcy Rule 2014.

13. Dundon shall use its reasonable efforts to avoid any duplication of services provided by any of the Committee's other retained professionals in this Chapter 11 Case.

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

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

16. 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.

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