

**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)

(Jointly Administered)

Re: Docket No. 192

Objection Deadline: February 26, 2026 at 4:00 p.m. (ET)

DISCLOSURE DECLARATION OF ORDINARY COURSE PROFESSIONAL

I, James Halstead, hereby declare that the following is true to the best of my knowledge, information, and belief:

1. I am a partner of Covington & Burling LLP (the “Firm”) which maintains offices at 22 Bishopsgate, London EC2N 4BQ, United Kingdom.

2. This Declaration is submitted in connection with the order (the “OCP Order”) entered by the United States Bankruptcy Court for the District of Delaware dated January 20, 2026, authorizing the above-captioned debtors and debtors in possession (collectively, the “Debtors”) to retain certain professionals in the ordinary course of business during the pendency of the Debtors’ Chapter 11 Cases.

3. The Firm has represented and advised certain of the Debtors as legal counsel with respect to regulatory and general corporate matters, since approximately April 29, 2020.

4. The Firm is a legal services firm.

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); Nine Square Therapeutics, Inc. (4503); and Nereid Therapeutics Incorporated (8493). The location of the Debtors’ service address in these chapter 11 cases is 230 Park Avenue, Suite 2800, New York, NY 10169.



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5. The Firm has provided services to the Debtors prior to December 9, 2025 (the “Petition Date”).

6. The Debtors have requested, and the Firm has agreed, to continue to provide services to the Debtors pursuant to section 327 of title 11 of the United States Code (the “Bankruptcy Code”) with respect to such matters, including regulatory advice with respect to the Debtors’ investments and operations.

7. The Firm’s current customary hourly rates, subject to change from time to time, range from £575 to £2,250 for attorneys and from £350 to £700 for legal assistants. In the normal course of business, the Firm revises its regular hourly rates and advises that, effective January 1 of each year, the aforementioned rates will be revised to the regular hourly rates that will be in effect at that time.

8. The Firm keeps time records in one-tenth-of-an-hour increments in the ordinary course of business.

9. To the best of my knowledge, formed after due inquiry, neither I nor any professional employed by the Firm is a relative of the United States Bankruptcy Judge assigned to these Chapter 11 Cases, and the Firm does not have any connection with the United States Bankruptcy Judge, the Office of the United States Trustee, or any person employed by the Office of the United States Trustee that would render the Firm’s retention in these Chapter 11 Cases improper.

10. To the best of my knowledge, formed after due inquiry, neither I, the Firm, nor any professional thereof has any connection with, or currently represents, any of the Debtors’ creditors or other parties in interest with respect to the matters upon which it is to be engaged.

11. In addition, although unascertainable at this time after due inquiry, by virtue of the magnitude of the Debtors' potential universe of creditors and the Firm's clients, the Firm may have in the past represented, currently represent, and may in the future represent entities and individuals that are creditors of the Debtors in matters entirely unrelated to the Debtors and their estates. The Firm does not and will not represent any such entity in connection with these Chapter 11 Cases and does not have any relationship with any creditor that would be adverse to the Debtors or their estates with respect to the matters for which the Firm is engaged by the Debtors. I believe that the Firm's representation of such entities in matters entirely unrelated to the Debtors is not adverse to the Debtors' interests, or the interests of their creditors or estates in respect of the matters for which the Firm will be engaged, nor will such representation impair the Firm's ability to represent the Debtors in these Chapter 11 Cases.

12. The Firm's process of ascertaining whether it holds or represents an interest adverse to the Debtors, their estates, or any class of creditors or equity interest holders consists of the following: I obtained from the Debtors and their representatives the names of individuals and entities that may be parties in interest in these Chapter 11 Cases (collectively, "Parties in Interest"). At my request, the Firm's staff personnel performed a search of its electronic database containing the names and matter descriptions of all current and past representations handled by the Firm to determine whether the Firm had been retained within the last five (5) years to represent any of the Parties in Interest (or their apparent affiliates, as the case may be). The results of the Firm's searches for its connections to the Interested Parties are set forth on Schedule 1 attached hereto.

13. In light of the foregoing, I believe that the Firm does not hold or represent any interest materially adverse to the Debtors, their estates, creditors, or equity interest holders, as identified to the Firm, with respect to the matter in which the Firm will be engaged.

14. In the past year, the Firm has been paid £23,136 by the Debtors in respect of services rendered to the Debtors. In addition, the Firm has rendered services that have not yet been billed or that have been billed but with respect to which payment has not yet been received. The Firm is currently owed \$17,731.50 on account of prepetition services.

15. I also understand the limitations on compensation and reimbursement of expenses under the OCP Order. Specifically, the Firm understands that in the event its fees and expenses exceed a total of \$75,000 per month, on average, over a rolling three-month period, the Firm will be required to file with the Court a fee application for approval of its fees and expenses for such month in accordance with Bankruptcy Code sections 330 and 331, the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and any applicable procedures or orders of the Court.

16. Except as set forth herein, no promises have been received by the Firm or any partner, associate, or other professional thereof as to compensation in connection with these Chapter 11 Cases other than in accordance with the provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and orders of the Court.

17. The Firm further states that it has not shared, nor agreed to share any compensation received in connection with these Chapter 11 Cases with another party or person, other than as permitted by section 504(b) of the Bankruptcy Code and Bankruptcy Rule 2016.

18. The foregoing constitutes the statement of the Firm pursuant to sections 329 and 504 of the Bankruptcy Code and Bankruptcy Rules 2014 and 2016(b).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

/s/ James Halstead

James Halstead
22 Bishopsgate
London EC2N 4BQ
United Kingdom

Schedule 1

Name of Interested Party	Status - Current / Former Client
1Life HealthCare, Inc.	Current
Abcam Limited	Current
Adobe	Current
Agilent Technologies, Inc.	Current
Alaska Airlines, Inc.	Current
Altasciences Company Inc.	Current
Amazon Technologies, Inc.	Current
Arthur J. Gallagher & Co.	Current
Atlas Copco AB (in relation to Atlas Copco Compressors LLC)	Current
Asuragen, Inc.	Current
Azenta Life Sciences	Current
Beckman Coulter	Current
Becton, Dickinson & Co.	Current
Becton, Dickinson and Company	Current
BioLegend, Inc.	Current
Bio-Techne Sales Corporation	Current
Bridge Bank	Current
California Chamber of Commerce	Current
Canon, Inc.	Current
Canon Finetech Nisca, Inc.	Current
CDW Corporation	Current
Champions Oncology, Inc.	Current
Charles River Laboratories	Current
CNA Enterprises, Inc.	Current
Cole-Parmer Instrument Company, LLC	Current
Costco	Current
Crown Bioscience Netherlands BV	Current
Crown Bioscience, Inc.	Current
Dechert LLP	Current
DHL	Current
eBay	Current
Elsevier B.V.	Current
Etsy	Current
FUJIFILM Cellular Dynamics, Inc.	Current
FUJIFILM Wako Chemicals U.S.A. Corporation	Current
Genewiz, LLC	Current
Github	Current
Global Life Sciences Solutions USA LLC	Current
GSL Biotech, LLC	Current

Name of Interested Party	Status - Current / Former Client
Gyros Protein Technologies	Current
HIS	Current
Hyatt	Current
Illumina, Inc.	Current
Intuit	Current
JP Morgan Chase Bank, N.A.	Current
Lenovo Group	Current
Life Technologies Corporation	Current
LinkedIn Corporation	Current
Lowe's	Current
Marriott	Current
Microsoft Office Azure	Current
Microsoft Store	Current
Mishcon De Reya LLP (UK)	Current
New England Biolabs	Current
Okta, Inc	Current
OpenAI	Current
Patrick Kennedy ¹	Current
PricewaterhouseCoopers LLC	Current
PricewaterhouseCoopers LLP	Current
Proskauer Rose LLP	Current
Quinn Emanuel Urquhart & Sullivan, LLP	Current
Regents of the University of Michigan	Current
Santa Cruz Biotechnology Inc	Current
Stanford University	Current
Starbucks	Current
Takara Bio USA, Inc.	Current
Target	Current
The Home Depot	Current
The New York Times	Current
The Regents of the University of California, San Francisco	Current
The Regents pf the University of California	Current
Thermo Fisher Scientific Inc.	Current
Uber	Current
United	Current
Unity Biotechnology	Current
Vectura Ltd.	Current
Verizon	Current

¹ The Firm represents an individual with this name in connection with matters unrelated to the Debtors.

Name of Interested Party	Status - Current / Former Client
Wave	Current
Wave Rock	Current
Western Alliance Bank	Current
Whole Foods Market	Current
Zoom Video Communications, Inc.	Current
8x8, Inc.	Former
American Chemical Society	Former
Pulsar Informatics, Inc. (in relation to Ascidian Therapeutics)	Former
BDO Legal Rechtsanwaltsgesellschaft mbH (in relation to BDO USA LLP)	Former
Benchling, Inc.	Former
Bioduro-Sundia LLC	Former
California Life Sciences Association	Former
Checkr, Inc.	Former
Clarivate Analytics	Former
Clipper Realty Inc.	Former
Cshl Meetings & Courses	Former
Dana-Farber Cancer Institute, Inc.	Former
Fragomen, Del Rey, Bernsen & Loewy, LLP	Former
Grainger	Former
GraphPad	Former
Hamamatsu Corporation	Former
Horizon Discovery Biosciences Ltd	Former
IKEA	Former
Instacart	Former
Marengo Therapeutics	Former
New Pig Corporation	Former
NXT Power	Former
Panera Bread	Former
Science AAAS	Former
Shimadzu Scientific Instruments, Inc.	Former
Springer Nature	Former
Stemcell Technologies Inc	Former
W.W. Grainger, Inc.	Former