

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

In re:  Apple Tree Life Sciences, Inc., <i>et al.</i> , <sup>1</sup>  Debtors.	Chapter 11  Case No. 25-12177 (LSS)  (Jointly Administered)
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**DEBTORS’ WITNESS AND EXHIBIT LIST FOR  
HEARING ON FEBRUARY 19, 2026 AT 10:00 A.M. (ET)**

PLEASE TAKE NOTICE that the above-captioned debtors and debtors in possession (the “Debtors”), hereby submit this witness and exhibit list (the “Witness and Exhibit List”) for the hearing scheduled for February 19, 2026, at 10:00 a.m. (ET) (the “Hearing”) before the Honorable Laurie Selber Silverstein, United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 6th Floor, Courtroom No. 2, Wilmington, Delaware 19801, in connection with the matters scheduled to go forward at the Hearing.

**WITNESSES**

The Debtors designate the following individuals as potential witnesses for the Hearing whose testimony may be presented live and/or through their declarations:

Name	Topic
Perry Mandarino, Chief Restructuring Officer to the Debtors; Head of Restructuring/Senior Managing Director at B. Riley Restructuring Services, LLC	All topics related to the Second Funding Motion, the DIP Motion, or B. Riley’s Retention Application

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number include: Apple Tree Life Sciences, Inc. (4506); ATP Life Science Ventures, L.P. (8224); ATP III GP, Ltd. (6091); Apertor Pharmaceuticals, Inc. (3161); Initial Therapeutics, Inc. (2453); Marlinspike Therapeutics, Inc. (4757); Red Queen Therapeutics, Inc. (8563); Evercrisp Biosciences, Inc. (4437); Nine Square Therapeutics, Inc. (4503); and Nereid Therapeutics Incorporated (8493). The location of the Debtors’ service address in these chapter 11 cases is 230 Park Avenue, Suite 2800, New York, NY 10169.



<b>Name</b>	<b>Topic</b>
Dr. Seth L. Harrison, Managing Director of Apple Tree Partners	All topics related to the Second Funding Motion or the DIP Motion
Paul Eisenberg, Venture Partner at Apple Tree Life Sciences, Inc.; Director of Nereid Therapeutics Incorporated; Director of Apertor Pharmaceuticals, Inc.; Director of Deep Apple Therapeutics, Inc.; Chief Medical Officer of Red Queen Therapeutics, Inc.	Certain topics related to the Second Funding Motion or the DIP Motion
Meenu Karson, CEO and Director of Evercrisp Biosciences, Inc.	Certain topics related to the Second Funding Motion or the DIP Motion

The Debtors reserve the right to (a) identify additional witnesses who may testify at the Hearing, (b) cross-examine any witness called by any other party, (c) call additional witnesses for the purposes of rebuttal or impeachment, (d) call any witness identified by another party on their witness list, regardless of whether that party thereafter removes the witness from their list, (e) designate additional deposition testimony, and (f) call any witness necessary for the purpose of authenticating documents or otherwise seeking the admission of documents into evidence.

**EXHIBITS<sup>2</sup>**

The Debtors designate the following exhibits that may be used at the Hearing in connection with the matters to be heard:

<b>Exhibit No.</b>	<b>Description</b>	<b>Docket No. / Bates No. / Other Identifier</b>
1.	<i>Declaration of Perry M. Mandarino in Support of Debtors' Motion for Entry of an Order (I) Approving the Retention and Employment of B. Riley Restructuring Services, LLC to Provide the Debtors with a Chief Restructuring Officer and Additional Staff Effective as of the Petition Date and (II) Designating Perry M. Mandarino as the Chief Restructuring Officer to the Debtors; and (III) Granting Related Relief</i>	Docket No. 131-3
2.	<i>Declaration of Patricia B. Tomasco in Support of the Debtors' Application for an Order Authorizing the Retention and Employment of Quinn Emanuel Urquhart &amp; Sullivan, LLP as Co-Counsel for the Debtors Effective as of the Petition Date</i>	Docket No. 132-3
3.	<i>Declaration of Perry M. Mandarino in Support of the Debtors' Application for an Order Authorizing the Retention and Employment of Quinn Emanuel Urquhart &amp; Sullivan, LLP as Co-Counsel for the Debtors Effective as of the Petition Date</i>	Docket No. 132-4
4.	<i>Nereid Therapeutics Incorporated Secured Promissory Note, dated June 11, 2025</i>	Docket No. 144-17; Docket No. 228-2
5.	<i>Declaration of Perry M. Mandarino, Chief Restructuring Officer of the Debtors, in Support of Chapter 11 Petitions and First Day Motions</i>	Docket No. 25
6.	<i>Supplemental Declaration of Perry M. Mandarino, Chief Restructuring Officer of the Debtors, in Support of Chapter 11 Petitions and First Day Motions</i>	Docket No. 63
7.	<i>Declaration of Perry M. Mandarino in Support of Debtors' Motion for Entry of Interim and Final Orders to (I) Make and Accept Secured Loans to Portfolio Companies, (II) Authorize to the Extent Outside the Ordinary Course of Business Payment of Management Company Expenses and (III) Grant Related Relief</i>	Docket No. 90
8.	<i>Second Supplemental Declaration of Perry M. Mandarino, Chief Restructuring Officer of the Debtors, in Support of Chapter 11 Petitions and First Day Motions</i>	Docket No. 163

<sup>2</sup> For the avoidance of doubt, all declarations listed hereon are offered only for reference and not for the truth of the matter unless and until explicitly moved into evidence.

<b>Exhibit No.</b>	<b>Description</b>	<b>Docket No. / Bates No. / Other Identifier</b>
9.	<i>Declaration of Perry M. Mandarino, Chief Restructuring Officer of the Debtors in Support of Debtors' Motion for Entry of Order (I) Authorizing Use of Funds to (A) Fund Portfolio Companies, (B) Pay Management Company Expenses, and (C) Pay Chapter 11 Expenses, and (II) Granting Related Relief</i>	Docket No. 229
10.	<i>Project Newton 26-Week Cashflow Forecast, dated January 15, 2026</i>	Docket No. 160-1
11.	<i>Project Newton 26-Week Cashflow Forecast, dated January 29, 2026</i>	Docket No. 229-1
12.	<i>Declaration of Dr. Seth L. Harrison in Support of Chapter 11 Petitions and First Day Motions</i>	Docket No. 18
13.	<i>Corporate Organizational Structure Chart</i>	Docket No. 18
14.	<i>Final Order to (I) Make and Accept Secured Loans to Portfolio Companies, (II) Authorize to the Extent Outside the Ordinary Course of Business Payment of Management Company Expenses and (III) Granting Related Relief</i>	Docket No. 206
15.	<i>December 15, 2025 Hearing Transcript</i>	Docket No. 55
16.	<i>December 17, 2025 "First Day" Hearing Transcript</i>	Docket No. 81
17.	<i>December 30, 2025 Hearing Transcript</i>	Docket No. 113
18.	<i>January 20, 2026 Hearing Transcript</i>	Docket No. 210
19.	<i>First Amended and Restated Limited Partnership Agreement</i>	Docket No. 144-6
20.	<i>LPA Amendment No. 2</i>	--
21.	<i>LPA Amendment No. 3</i>	Docket No. 144-19
22.	<i>LPA Amendment No. 4</i>	--
23.	<i>LPA Amendment No. 5</i>	--
24.	<i>LPA Amendment No. 6</i>	--
25.	<i>LPA Amendment No. 7</i>	--
26.	<i>LPA Amendment No. 8</i>	--
27.	<i>LPA Amendment No. 9</i>	--
28.	<i>LPA Amendment No. 10</i>	--
29.	<i>LPA Amendment No. 11</i>	--

<b>Exhibit No.</b>	<b>Description</b>	<b>Docket No. / Bates No. / Other Identifier</b>
30.	<i>LPA Amendment No. 12</i>	--
31.	<i>LPA Amendment No. 13</i>	Docket No. 144-11
32.	<i>LPA Amendment No. 14</i>	Docket No. 160-5
33.	<i>LPA Amendment No. 15</i>	--
34.	<i>LPA Amendment No. 16</i>	--
35.	<i>LPA Amendment No. 17</i>	--
36.	<i>LPA Amendment No. 18</i>	--
37.	<i>LPA Amendment No. 19</i>	--
38.	<i>LPA Amendment No. 20</i>	--
39.	<i>LPA Amendment No. 21</i>	--
40.	<i>LPA Amendment No. 22</i>	--
41.	<i>Aethon Series A Preferred Stock Purchase Agreement, dated December 16, 2022</i>	--
42.	<i>Apertor Series A Preferred Stock Purchase Agreement, dated November 5, 2020</i>	--
43.	<i>Aulos Series A Preferred Stock Purchase Agreement, dated October 30, 2020</i>	--
44.	<i>Evercrisp Series A Preferred Stock Purchase Agreement, dated August 11, 2021</i>	--
45.	<i>Initial (Opal) Series A Preferred Stock Purchase Agreement, dated July 2, 2020</i>	--
46.	<i>Marlinspike Series A Preferred Stock Purchase Agreement, dated February 2, 2022</i>	--
47.	<i>Nereid Series A Preferred Stock Purchase Agreement, dated October 13, 2020</i>	--
48.	<i>Nine Square Series A Preferred Stock Purchase Agreement, dated June 16, 2020</i>	--
49.	<i>Red Queen Series A Preferred Stock Purchase Agreement, dated October 13, 2021</i>	--
50.	<i>Secured Promissory Note between Apertor and ATP, dated June 11, 2025</i>	Docket No. 144-13
51.	<i>Secured Promissory Note between Evercrisp and ATP, dated June 11, 2025</i>	Docket No. 144-14

<b>Exhibit No.</b>	<b>Description</b>	<b>Docket No. / Bates No. / Other Identifier</b>
52.	<i>Secured Promissory Note between Initial and ATP, dated June 11, 2025</i>	Docket No. 89-3
53.	<i>First Amendment to Secured Promissory Note between Initial and ATP, dated July 24, 2025</i>	Docket No. 144-15
54.	<i>Secured Promissory Note between Marlinspike and ATP, dated June 11, 2025</i>	Docket No. 144-16
55.	<i>Secured Promissory Note between Nine Square and ATP, dated June 11, 2025</i>	Docket No. 144-18
56.	<i>September 19, 2025 Hearing Transcript, ATP III GP, LTD. v. Rigmora, No. 2025-0607-KSJM</i>	Docket No. 141-1, Ex. B
57.	<i>ATP III GP Motion to Maintain Status Quo, ATP III GP, LTD. v. Rigmora, No. 2025-0607-KSJM</i>	Docket No. 141-1, Ex. A
58.	<i>October 16, 2025 Hearing Transcript, ATP III GP, LTD. v. Rigmora, No. 2025-0607-KSJM</i>	Docket No. 144-5
59.	<i>ATP III GP Pre-Trial Brief, ATP III GP, LTD. v. Rigmora, No. 2025-0607-KSJM</i>	Docket No. 144-7
60.	<i>ATP III GP Post-Trial Brief, ATP III GP, LTD. v. Rigmora, No. 2025-0607-KSJM</i>	Docket No. 144-12
61.	<i>ATP III GP Post-Trial Reply Brief, ATP III GP, LTD. v. Rigmora, No. 2025-0607-KSJM</i>	Docket No. 144-8
62.	<i>Post-Trial Memorandum Opinion, ATP III GP, LTD. v. Rigmora, No. 2025-0607-KSJM (Del. Ch. Dec. 3, 2025)</i>	Docket No. 17-1; Docket No. 18
63.	<i>Letter from Debtors Counsel to Rigmora Regarding Funding of Portfolio Companies, dated September 8, 2025</i>	Docket No. 144-10
64.	<i>Amended Winding Up Petition, dated November 21, 2025</i>	Docket No. 226-9
65.	<i>Email from Rigmora's Cayman Counsel to the Cayman Court Regarding the Chapter 11 Cases, dated December 10, 2025</i>	Docket No. 141-1, Ex. C
66.	<i>Email from Debtors' Cayman Counsel to Cayman Court Regarding the Chapter 11 Cases, dated December 10, 2025</i>	Docket No. 141-1, Ex. D
67.	<i>Letter from Debtors' Counsel to Rigmora's Cayman Counsel Regarding Debtors' Cayman Stay, dated December 11, 2025</i>	Docket No. 141-1, Ex. E
68.	<i>Emails between Debtors' Cayman Counsel and Rigmora's Cayman Counsel Regarding Rigmora's Proposed Cayman Order, dated between December 11 and 17, 2025</i>	Docket No. 141-1, Ex. J
69.	<i>Letter from Debtors' Counsel to Rigmora Regarding Cayman Cases Case-Management, dated December 16, 2025</i>	Docket No. 150-1
70.	<i>Rigmora's Skeleton Argument, dated December 16, 2025</i>	Docket No. 141-1, Ex. G
71.	<i>Debtors' Skeleton Argument, dated December 16, 2025</i>	--

<b>Exhibit No.</b>	<b>Description</b>	<b>Docket No. / Bates No. / Other Identifier</b>
72.	<i>December 17, 2025 Cayman Islands Hearing Transcript</i>	Docket No. 141-1, Ex. H
73.	<i>Rigmora's Proposed Order, dated December 17, 2025</i>	Docket No. 141-1, Ex. I
74.	<i>December 22, 2025 Judgment, Cause Nos. FSD 146 and 151 of 2025 (JAJ)</i>	Docket No. 141-1, Ex. K; Docket No. 244-11; Docket No. 245-6
75.	<i>Consent, dated November 11, 2019</i>	Docket No. 144-23
76.	<i>Consent, dated December 28, 2020</i>	Docket No. 144-24
77.	<i>PPD Development Master Services Agreement, dated Sept 14, 2021</i>	--
78.	<i>Amendment to PPD Development Master Services Agreement, dated July 29, 2024</i>	--
79.	<i>ATP 2025 Q2 Report</i>	Docket No. 144-3
80.	<i>ATP 2024 Q4 Report</i>	Docket No. 144-4
81.	<i>December 2025 "Portfolio Lift-Out Opportunities" Presentation</i>	--
82.	<i>ATP Life Science Ventures, L.P. Consolidated Financial Statements and Report of Independent Certified Public Accountants as of and for the Year Ended December 31, 2024</i>	Docket No. 245-1
83.	<i>DIP Term Sheet</i>	Docket No. 313-1, Ex. 1
84.	<i>Project Newton 26-Week Cashflow Forecast, dated February 12, 2026</i>	Docket No. 313-1, Ex. 2
85.	<i>Declaration of Perry M. Mandarino, Chief Restructuring Officer of the Debtors in Support of Debtors' Motion for Entry of Interim and Final Orders: (A) Authorizing the Debtors to Incur Post-Petition Debt, (B) Granting Super-Priority Administrative Expense Claims, (C) Scheduling a Final Hearing, and (D) Granting Related Relief</i>	Docket No. 314
86.	<i>Email from William Taft to Perry Mandarino, et al. Regarding Budget Request, dated February 7, 2026</i>	Docket No. 314-1
87.	<i>Rigmora Summary of Key Terms Sheet</i>	
88.	<i>Rigmora DIP Facility Term Sheet</i>	
89.	<i>Order Authorizing the Debtors to Open New Segregated Bank Account</i>	Docket No. 79

Exhibit No.	Description	Docket No. / Bates No. / Other Identifier
90.	<i>Email from Daniel Finkelman to Yuri Bogdanov, et al., with attachments Regarding Second Amendment to Loan Agreement, dated between March 9 and June 11, 2025</i>	ATPBK_00064373-ATPBK_00064399
91.	<i>Email from Patrik Blochlinger to Daniel Finkelman, et al. Regarding Second Amendment to Loan Agreement, dated between March 9 and June 11, 2025</i>	ATPBK_00064400-ATPBK_00064417
92.	<i>Voluntary Petition, In re Sea Launch Company, LLC, No. 09-12153 (BLS) [Docket No. 1]</i>	Docket No. 244-1
93.	<i>Declaration of Brett A. Carman in Support of Chapter 11 Petitions and First Day Motions, In re Sea Launch Company, LLC, No. 09-12153 (BLS) [Docket No. 4]</i>	Docket No. 244-2
94.	<i>Findings of Fact, Conclusions of Law, and Order Confirming the Debtors' Second Amended Plan of Reorganization, In re Sea Launch Company, LLC, No. 09-12153 (BLS) [Docket No. 923]</i>	Docket No. 244-3
95.	<i>Voluntary Petition, In re MatlinPatterson Global Opportunities Partners II L.P., No. 21-11255 (DSJ) [Docket No. 1]</i>	Docket No. 244-4
96.	<i>Declaration of Matthew Doheny, Chief Restructuring Officer of the Debtors, in Support of Chapter 11 Petitions and First Day Motions In Compliance with Local Rule 1007-2, In re MatlinPatterson Global Opportunities Partners II L.P., No. 21-11255 (DSJ) [Docket No. 2]</i>	Docket No. 244-5
97.	<i>Findings of Fact, Conclusions of Law, and Order (I) Confirming the Debtors' Second Amended Joint Chapter 11 Plan of Liquidation and (II) Approving the Related Disclosure Statement on a Final Basis, In re MatlinPatterson Global Opportunities Partners II L.P., No. 21-11255 (DSJ) [Docket No. 915]</i>	Docket No. 244-6
98.	<i>Voluntary Petition, In re Petra Offshore Fund LP, No. 10-15501 (SCC) [Docket No. 1]</i>	Docket No. 244-7
99.	<i>Affidavit Pursuant to Local Rule 1007-2, In re Petra Fund REIT Corp., No. 10-15500 (SCC) [Docket No. 2]</i>	Docket No. 244-8
100.	<i>Order Confirming Second Amended Plan of Reorganization of Petra Fund REIT Corp. and Petra Offshore Fund, L.P., as Modified, In re Petra Fund REIT Corp., No. 10-15500 (SCC) [Docket No. 259]</i>	Docket No. 244-9
101.	<i>Designations of Deposition Transcript of Yuri Bogdanov, conducted on February 15, 2026</i>	--
102.	<i>Chapter 15 Petition for Recognition of a Foreign Proceeding, In re ECM Straits Fund I, LP (in Official Liquidation), No. 23-12044 (MG) [Docket No. 1]</i>	--

<b>Exhibit No.</b>	<b>Description</b>	<b>Docket No. / Bates No. / Other Identifier</b>
103.	<i>Order Granting Recognition and Relief in Aid of a Foreign Main Proceeding Pursuant to Sections 1504, 1509, 1515, 1517, 1520, and 1521 of the Bankruptcy Code, In re ECM Straits Fund I, LP (in Official Liquidation), No. 23-12044 (MG) [Docket No. 15]</i>	--
104.	<i>Declaration of Peter Sherwood in Support of Chapter 15 Petition for Recognition as Foreign Main Proceeding, In re ECM Straits Fund I, LP (in Official Liquidation), No. 23-12044 (MG) [Docket No. 4]</i>	--
105.	<i>Chapter 15 Petition for Recognition of a Foreign Proceeding, In re Platinum Partners Value Arbitrage Fund L.P., No. 16-12925 (SCC) [Docket No. 1]</i>	--
106.	<i>Order Granting Recognition and Relief in Aid of a Foreign Main Proceeding Pursuant to Sections 1504, 1509, 1515, 1517, 1520, and 1521 of the Bankruptcy Code, In re Platinum Partners Value Arbitrage Fund L.P., No. 16-12925 (SCC) [Docket No. 27]</i>	--
107.	<i>Declaration of Warren E. Gluck in Support of Recognition as Foreign Main Proceeding to Chapter 15 of the Bankruptcy Code, In re Platinum Partners Value Arbitrage Fund L.P., No. 16-12925 (SCC) [Docket No. 4]</i>	--
108.	<i>February 13, 2026 Discovery Conference Transcript</i>	Docket No. 318
109.	<i>Email from Rigmora's Counsel to Debtors' Counsel Regarding Proposed Form of Chancery Court Order, with Attachments, dated December 10, 2025</i>	RIGMORA_BK179- RIGMORA_BK192
110.	<i>Rigmora's Amended Reply to the Amended Defence to the Amended Winding Up Petition, dated November 24, 2025</i>	--
111.	<i>RTW Presentation to Rigmora Regarding ATP Portfolio, dated November 20, 2025</i>	Docket No. 332, Ex. E
112.	<i>RTW Presentation to Rigmora Regarding ATP Portfolio Follow-Up, dated December 18, 2025</i>	Docket No. 332, Ex. F
113.	<i>Email from Kristina Koskinen to Yuantao Li Regarding RTW Interest in Investing, dated June 11, 2025</i>	ATPBK_00030400- ATPBK_00030401
114.	<i>Email from Lindsay McBride to RTW Regarding RTW Interest in Investing, dated Jan 6, 2023</i>	ATPBK_00238595
115.	<i>Partial Final Judgment and Order Pursuant to Rule 54(b), ATP III GP, LTD. v. Rigmora, No. 2025-0607-KSJM (Del. Ch. Dec. 11, 2025)</i>	--
116.	<i>Any other document or pleading filed in the above captioned cases</i>	--
117.	<i>Any exhibit necessary for impeachment or rebuttal purposes</i>	--
118.	<i>Any exhibit identified or offered by any other party</i>	--

**RESERVATION OF RIGHTS**

The Debtors reserve all rights, including but not limited to the right to amend, revise, supplement, or withdraw this Witness and Exhibit List at any time, to designate additional witnesses and exhibits, to call or cross examine any person identified as a witness by any other party in interest or introduce any document identified as an exhibit by any other party in interest, to add deposition designations, and to offer additional witnesses and exhibits at the Hearing for purposes of impeachment or rebuttal, in response to witnesses and evidence offered by any other party, and for any other permissible purpose under the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure, and the Federal Rules of Evidence. The Debtors also reserve the right to amend this Witness and Exhibit List at any time prior to the close of the Hearing, including, without limitation, in the event of the filing of any objections, responses, replies, supplemental declarations, or other filings in connection with the Hearing.

*[Signature Page Follows]*

Dated: February 18, 2026  
Wilmington, Delaware

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Respectfully submitted,

/s/ Ethan H. Sulik

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