

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: March 2, 2026 at 4:00 p.m. (ET)

DISCLOSURE DECLARATION OF ORDINARY COURSE PROFESSIONAL

I, John P. Rearick, hereby declare that the following is true to the best of my knowledge, information, and belief:

1. I am an attorney at law and a partner at Cooley LLP (the “Firm”) which maintains offices at 500 Boylston Street, Boston, MA 02116.

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 Red Queen Therapeutics, Inc. as legal counsel with respect to intellectual property matters since October 20, 2025.

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.



5. The Firm has provided services to the Debtors prior to December 15, 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. Additionally, the Debtors have requested, and the Firm proposes to render, patent prosecution services to Red Queen Therapeutics, Inc. during these Chapter 11 Cases.

7. The Firm’s current customary hourly rates, subject to change from time to time, are reflected in the chart below. In the normal course of business, the Firm adjusts its customary hourly rates and advises that effective January 1 of each year, the aforementioned rates will be adjusted to customary hourly rates that will be in effect at that time. The Firm has agreed that a 10% discount will apply to fees billed by partners.

Billing Category	Range
Partners	\$1,790 - \$2,595
Counsel ²	\$1,535 - \$2,855
Associates	\$910 - \$1,670
Paralegals	\$240 - \$780
Professional Staff	\$475 - \$780

8. The Firm does keep 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

² Includes Senior Counsel, Of Counsel, and Special Counsel timekeepers.

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. 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 its 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: the Firm obtaining from the Debtors' bankruptcy counsel a list of interested parties and searching its client/matter records to ensure that it does not have any conflicts or other connections that might cause it to hold or represent an interest adverse to the Debtors with respect to the matter on which the Firm is to be retained as an ordinary course professional.

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 \$0.00 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 \$1,638.70 on account of prepetition services.

15. As of the Petition Date, the Firm held no retainer.

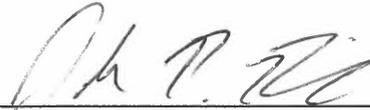
16. I also understand the limitations on compensation and reimbursement of expenses under the OCP Order. Specifically, the Firm understands that in the event its fees and expenses exceed a total of \$75,000 per month, on average, over a rolling three-month period, the Firm will be required to file with 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.

17. 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.

18. 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.

19. 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.



John P. Rearick, Esq.

COOLEY LLP

500 Boylston Street

Boston, MA 02116

Tel: (617) 937-2300

Email: jrearick@cooley.com