

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

In re:

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

Debtors.

Chapter 11

Case No. 25-12177 (LSS)

(Jointly Administered)

**Re: Docket No. 148**

**SECOND SUPPLEMENTAL DECLARATION OF SHELLEY WHITE IN SUPPORT OF DEBTORS' APPLICATION PURSUANT TO SECTIONS 327(e) AND 330 OF THE BANKRUPTCY CODE FOR ENTRY OF AN ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF WALKERS (CAYMAN) LLP AS CAYMAN ISLANDS COUNSEL TO THE DEBTORS EFFECTIVE AS OF THE PETITION DATE**

I, Shelley White, under the penalty of perjury, declare as follows:

1. I am a partner of the firm of Walkers (Cayman) LLP ("Walkers"), proposed Cayman Islands counsel to the above captioned debtors and debtors in possession (collectively, the "Debtors") in these chapter 11 cases (these "Chapter 11 Cases").

2. I submit this second supplemental declaration (this "Second Supplemental Declaration") in further support of the *Debtors' Application Pursuant to Sections 327(e) and 330 of the Bankruptcy Code for Entry of an Order Authorizing the Retention and Employment of Walkers (Cayman) LLP as Cayman Islands Counsel to the Debtors Effective as to the Petition Date* (the "Application")<sup>2</sup> to provide certain disclosures in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules.

<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.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the respective meanings set forth in the Application.



3. Attached to the Application as Exhibit B was the *Declaration of Shelley White in Support of Debtors' Application Pursuant to Sections 327(e) and 330 of the Bankruptcy Code for Entry of an Order Authorizing the Retention and Employment of Walkers (Cayman) LLP as Cayman Islands Counsel to the Debtors Effective as of the Petition Date* (the "Initial Declaration"). Subsequent to the filing of the Application, Walkers also filed the *Supplemental Declaration of Shelley White in Support of Debtors' Application Pursuant to Sections 327(e) and 330 of the Bankruptcy Code for Entry of an Order Authorizing the Retention and Employment of Walkers (Cayman) LLP as Cayman Islands Counsel to the Debtors Effective as of the Petition Date* (the "Supplemental Declaration"). This Second Supplemental Declaration supplements the Initial Declaration and the Supplemental Declaration.

4. Attached to the Initial Declaration as Schedule A was a list of potential parties in interest in these Chapter 11 Cases. Subsequent to the filing of the Initial Declaration and the Supplemental Declaration, the Debtors made Walkers aware of certain additional parties in interest (the "Additional Parties in Interest"), a list of whom is attached hereto as Exhibit 1. Walkers caused to be submitted for review by its conflicts system the name of each of the Additional Parties in Interest. The results of this supplemental conflicts check were compiled and reviewed by Walkers professionals under my supervision. Based on this supplemental review, Walkers became aware of the additional connection disclosed on Exhibit 2 attached hereto.

5. As stated in the Initial Declaration and the Supplemental Declaration, I believe that Walkers does not represent or hold any interest adverse to the Debtors or to their estates with respect to the matters on which the Firm is to be employed, specifically, the winding up proceedings in the Cayman Islands (the "Cayman Proceedings") and any matters related thereto.

None of the Firm's active representations have any connection with the Firm's representation of the Debtors or their respective estates in these Chapter 11 Cases.

6. Walkers and certain of its members and other fee earners may currently represent, and likely in the future will represent creditors of the Debtors and other parties of interest in connection with matters unrelated to the Debtors, these Chapter 11 Cases or the Cayman Proceedings. At this time, I am not aware of any adverse interest, or of any connection with the Debtors, their creditors, the U.S. Trustee, or any party-in-interest in the matters upon which Walkers is to be employed, except as disclosed herein and in the Initial Declaration and the Supplemental Declaration. To the extent that any information disclosed in the Initial Declaration or the Supplemental Declaration or disclosed herein requires amendment or modification as additional party in interest information becomes available to Walkers, a further supplemental declaration will be submitted reflecting such amended or modified information.

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 knowledge and belief.

Dated: February 26, 2026

/s/ Shelley White

Shelley White  
Partner, Walkers Cayman

*Proposed Cayman Island Counsel to the Debtors*

**Exhibit 1**

**Additional Parties in Interest**

**Rigmora Counsel**

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

**Ordinary Course Professionals**

Covington & Burling LLP  
DiFilippo Corporate Finance Group  
Elsberg Baker & Maruri PLLC  
Mishcon De Reya LLP (UK)  
Stout Risius Ross, LLC

**Committee Professionals**

Cole Schotz P.C.  
Dundon Advisers LLC

**DIP Lender Parties**

Alter Domus (US) LLC  
Cleary Gottlieb & Hamilton LLP  
Holland & Knight  
Oak Tree Capital Management, Inc.

**Nereid Therapeutics Equity Holders**

Alice Ting  
Bahareh Eftekharzadeh  
Chanelle Jumper  
Cigall Kadoch  
Dr. Clifford Brangwynne  
Eugine Lee  
Defne Yarar  
Ivan Efremov  
Jared Toettcher  
John Reilly  
Dr. Laura Forese  
Robert Hugin

**Nereid Therapeutics Top 20 Unsecured Creditors**

AustinPX LLC  
Crelux GmbH  
Crystal Pharmatech Co., Ltd.  
Evotec US  
Nexomics BioSciences  
Oncolines  
Premier Research Consulting, LLC  
RREF II 451D, LLC  
STA Pharmaceutical Hong Kong Limited  
VectorBuilder, Inc.

**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

**Exhibit 2**

**Supplemental Conflict Analysis Results**

**Public disclosure approved**

Debevoise & Plimpton LLP  
Oak Tree Capital Management, Inc.