

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

In re:	Chapter 11
Apple Tree Life Sciences, Inc., <i>et al.</i> , ¹	Case No. 25-12177 (LSS)
Debtors.	(Joint Administration Requested)
	Re: Docket Nos. 136 and 148

**NOTICE OF FILING OF AMENDED ORDER PURSUANT TO
SECTIONS 327(e) AND 330 OF THE BANKRUPTCY CODE
AUTHORIZING THE EMPLOYMENT AND RETENTION OF
WALKERS (CAYMAN) LLP AS CAYMAN ISLANDS COUNSEL
TO THE DEBTORS EFFECTIVE AS OF THE PETITION DATE**

PLEASE TAKE NOTICE that, on January 8, 2026, the above-captioned debtors and debtors in possession (the “Debtors”) filed 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 of the Petition Date* [Docket No. 136] (the “Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that, attached to the Application as Exhibit A was a proposed form of order approving the retention and relief requested in the Application (the “Proposed Order”).

PLEASE TAKE FURTHER NOTICE that the Proposed Order was entered on February 12, 2026 [Docket No. 303].

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.



PLEASE TAKE FURTHER NOTICE that the United States Trustee for the District of Delaware (the “U.S. Trustee”) has requested certain changes to the Proposed Order.

PLEASE TAKE FURTHER NOTICE that, attached hereto as **Exhibit A** is an amended order (the “Amended Order”) which incorporates the request of the U.S. Trustee. For the convenience of the Court and all parties in interest, a blackline of the Amended Order against the Proposed Order is attached hereto as **Exhibit B**.

Dated: March 13, 2026
Wilmington, Delaware

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Respectfully submitted,

/s/ Brett M. Haywood

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Proposed Counsel to the Debtors and Debtors in Possession

EXHIBIT A

Amended 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)

(Jointly Administered)

Re: Docket Nos. 136 & 148

**AMENDED ORDER PURSUANT TO SECTIONS 327(e) AND 330 OF THE
BANKRUPTCY CODE AUTHORIZING THE EMPLOYMENT AND RETENTION
OF WALKERS (CAYMAN) LLP AS CAYMAN ISLANDS COUNSEL
TO THE DEBTORS EFFECTIVE AS OF THE PETITION DATE**

Upon the application (the “Application”)² of the above-captioned debtors and debtors in possession (the “Debtors”) seeking authorization to retain and employ Walkers (Cayman) LLP (the “Firm”) as Cayman Islands counsel in these Chapter 11 Cases effective as of the December 9, 2025 Petition Date; upon the *Declaration of Shelley White* (the “White Declaration”) and the *Declaration of Perry M. Mandarino* (the “Mandarino Declaration,” and with the White Declaration, the “Retention Declarations”), each annexed to the Application as Exhibit B and Exhibit C, respectively; and the Court being satisfied based on the representations made in the Application and the Retention Declarations that the Firm neither represents nor holds any interest adverse to the Debtors or to the estates with respect to the matters on which the Firm is to be employed, except as otherwise set forth in the Retention Declarations or the Application, and that the employment of the Firm as Cayman Islands counsel to the Debtors is necessary and

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² Capitalized terms used but not defined herein shall have the meanings set forth in the Application.

in the best interests of the Debtors and their estates and creditors; and it appearing that the Court has jurisdiction to consider the Application; and it appearing that due notice of the Application has been given and no further notice need be given; and upon the proceedings before the Court; and after due deliberation and good and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Application is granted as set forth herein.
2. Pursuant to sections 327(e) and 330 of the Bankruptcy Code, the Debtors are authorized to retain and employ the Firm as Cayman Islands counsel in these Chapter 11 Cases, effective as of the December 9, 2025 Petition Date, pursuant to the terms set forth in the Application.
3. The Firm shall be compensated for legal services rendered to the Debtors and reasonable expenses incurred in connection therewith in accordance with provisions of the Application, the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other orders of this Court.
4. Walkers shall not charge a markup to the Debtors with respect to fees billed by contract attorneys who are hired by Walkers to provide services for the Debtors and shall ensure that any such contract attorneys are subject to conflict checks and disclosures in accordance with the requirements of the Bankruptcy Code and Bankruptcy Rules.
5. The Firm shall apply for compensation from the Debtors for professional services rendered and reimbursement of expenses incurred in connection with its representation of the Debtors in compliance with sections 330 and 331 of the Bankruptcy Code (as applicable) and applicable provisions of the Bankruptcy Rules and Local Rules, and such other procedures as may be fixed by order of the Court.

6. The Firm shall make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the U.S. Trustee Guidelines in connection with the Application and any fee application to be filed by the Firm in these Chapter 11 Cases.

7. The Debtors and the Firm are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Application.

8. The Court shall retain exclusive jurisdiction over any disputes that may arise in connection with this Order.

EXHIBIT B

Blackline

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

In re: Apple Tree Life Sciences, Inc., <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 25-12177 (LSS) (Jointly Administered) Re: Docket Nos. 136 & 148
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Upon the application (the “Application”)² of the above-captioned debtors and debtors in possession (the “Debtors”) seeking authorization to retain and employ Walkers (Cayman) LLP (the “Firm”) as Cayman Islands counsel in these Chapter 11 Cases effective as of the December 9, 2025 Petition Date; upon the *Declaration of Shelley White* (the “White Declaration”) and the *Declaration of Perry M. Mandarin* (the “Mandarin Declaration,” and with the White Declaration, the “Retention Declarations”), each annexed to the Application as Exhibit B and Exhibit C, respectively; and the Court being satisfied based on the representations made in the Application and the Retention Declarations that the Firm neither represents nor holds any interest adverse to the Debtors or to the estates with respect to the matters on which the Firm is to be employed, except as otherwise set forth in the Retention Declarations or the

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Application, and that the employment of the Firm as Cayman Islands counsel to the Debtors is necessary and in the best interests of the Debtors and their estates and creditors; and it appearing that the Court has jurisdiction to consider the Application; and it appearing that due notice of the Application has been given and no further notice need be given; and upon the proceedings before the Court; and after due deliberation and good and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Application is granted as set forth herein.
2. Pursuant to sections 327(e) and 330 of the Bankruptcy Code, the Debtors are authorized to retain and employ the Firm as Cayman Islands counsel in these Chapter 11 Cases, effective as of the December 9, 2025 Petition Date, pursuant to the terms set forth in the Application.
3. The Firm shall be compensated for legal services rendered to the Debtors and reasonable expenses incurred in connection therewith in accordance with provisions of the Application, the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other orders of this Court.
4. Walkers shall not charge a markup to the Debtors with respect to fees billed by contract attorneys who are hired by Walkers to provide services for the Debtors and shall ensure that any such contract attorneys are subject to conflict checks and disclosures in accordance with the requirements of the Bankruptcy Code and Bankruptcy Rules.
5. ~~4.~~The Firm shall apply for compensation from the Debtors for professional services rendered and reimbursement of expenses incurred in connection with its representation of the Debtors in compliance with sections 330 and 331 of the Bankruptcy Code (as applicable)

and applicable provisions of the Bankruptcy Rules and Local Rules, and such other procedures as may be fixed by order of the Court.

6. ~~5.~~The Firm shall make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the U.S. Trustee Guidelines in connection with the Application and any fee application to be filed by the Firm in these Chapter 11 Cases.

7. ~~6.~~The Debtors and the Firm are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Application.

8. ~~7.~~The Court shall retain exclusive jurisdiction over any disputes that may arise in connection with this Order.