

**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. 133

**SUPPLEMENTAL DECLARATION OF L. KATHERINE GOOD OF POTTER
ANDERSON & CORROON LLP IN SUPPORT OF DEBTORS' APPLICATION TO
RETAIN AND EMPLOY POTTER ANDERSON & CORROON LLP AS CO-COUNSEL
TO THE DEBTORS AND DEBTORS IN POSSESSION PURSUANT TO SECTION
327(A) OF THE BANKRUPTCY CODE, BANKRUPTCY RULES 2014(A) AND 2016,
AND LOCAL RULE 2014-1, EFFECTIVE AS OF THE PETITION DATE**

I, L. Katherine Good, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner of the firm Potter Anderson & Corroon LLP ("Potter Anderson"), which maintains an office for the practice of law at 1313 N. Market Street, 6th Floor, Wilmington, Delaware 19801. I am an attorney-at-law, duly admitted and in good standing to practice in the State of Delaware and the United States District Court for the District of Delaware.

2. I make this supplemental declaration (this "Supplemental Declaration") in further support of the *Debtors' Application to Retain and Employ Potter Anderson & Corroon LLP as Co-Counsel to the Debtors and Debtors in Possession Pursuant to Section 327(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016, and Local Rule 2014-1, Effective as of the*

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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Petition Date (the “Application”)² to provide certain disclosures in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules.

3. Attached to the Application as Exhibit B was the *Declaration of L. Katherine Good of Potter Anderson & Corroon LLP in Support of Debtors’ Application to Retain and Employ Potter Anderson & Corroon LLP as Co-Counsel to the Debtors and Debtors in Possession Pursuant to Section 327(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016, and Local Rule 2014-1, Effective as of the Petition Date* (the “Initial Declaration”). This Supplemental Declaration supplements the Initial Declaration.

4. Attached to the Initial Declaration as Exhibit 1 was a list of potential parties in interest in these Chapter 11 Cases. In connection with its continuing duty to disclose, Potter Anderson had been made aware of additional parties in interest in these Chapter 11 Cases (the “Additional Parties in Interest”), a list of whom is attached hereto as Exhibit 1.

5. Consistent with the process described in the Initial Declaration, Potter Anderson has run the Additional Parties in Interest through its conflict system. Potter Anderson has in the past represented and may in the future represent, in matters wholly unrelated to the Debtors or these Chapter 11 Cases, Debevoise & Plimpton LLP (“Debevoise”). Debevoise is a former client of Potter Anderson’s who has been provided with general corporate advice within the last five (5) years. The engagement ended in 2023, and Potter Anderson will not represent Debevoise in any matter relating to the Debtors or these Chapter 11 Cases.

6. In addition to the disclosures contained in the Initial Declaration and above, one of Potter Anderson’s partners is married to a partner of Wilson Sonsini Goodrich & Rosati, P.C.

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

(“WSGR”). WSGR is an Ordinary Course Professional (as defined in that certain *Order (I) Authorizing Debtors to Employ Professionals Utilized in the Ordinary Course of Business, (II) Waiving Certain Information Requirements of Local Rule 2016-1, and (III) Granting Related Relief* [Docket No. 192]) that has provided and/or will provide certain legal services to the Debtors. WSGR also represents certain of the Debtors’ non-debtor affiliated portfolio companies.

7. Since the filing of the Initial Declaration, it has also been brought to Potter Anderson’s attention that it currently represents the Compensation Committee of B. Riley Financial, Inc., in connection with a matter unrelated to the Debtors or these Chapter 11 Cases.

8. Based on the foregoing, I believe that Potter Anderson is “disinterested” as that term is defined in section 101(14) of the Bankruptcy Code as it does not hold or represent any interest adverse to the Debtors’ estates.

9. Except as otherwise disclosed herein, Potter Anderson has no connection with any of the Additional Parties in Interest. To the extent that any information disclosed herein requires amendment or modification as additional party in interest information becomes available to Potter Anderson, a further supplemental declaration will be submitted to the Court 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.

Date: March 17, 2026
Wilmington, Delaware

By: /s/ L. Katherine Good
Name: L. Katherine Good

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
Oaktree 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