

**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.	(Jointly Administered)
	Re: Docket No. 458

**CERTIFICATE OF NO OBJECTION REGARDING DEBTORS’
MOTION FOR ENTRY OF AN ORDER ENLARGING THE TIME
TO FILE NOTICES OF REMOVAL OF RELATED PROCEEDINGS**

The undersigned hereby certifies that, as of the date hereof, no answer, objection or any other responsive pleading has been received to the *Debtors’ Motion for Entry of an Order Enlarging the Time to File Notices of Removal of Related Proceedings* [Docket No. 458] (the “Motion”) filed by the above-captioned debtors and debtors in possession (the “Debtors”), with the United States Bankruptcy Court for the District of Delaware (the “Court”) on March 9, 2026. Attached to the Motion was, among other things, a proposed form of order approving the relief requested in the Motion (the “Proposed Order”).

The undersigned further certifies that no answer, objection or other responsive pleading to the Motion has appeared on the Court’s docket in these cases. Pursuant to the *Notice of Motion and Hearing* filed with the Motion, any objection or response to the relief requested in the Motion was to be filed and served so as to be received by no later than March 23, 2026 at 4:00 p.m. (ET) (the “Objection Deadline”).

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.



WHEREFORE, the Debtors respectfully request that the Proposed Order, attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

Dated: March 25, 2026
Wilmington, Delaware

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Respectfully submitted,

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Proposed Counsel to the Debtors and Debtors in Possession

EXHIBIT A

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Apple Tree Life Sciences, Inc., <i>et al.</i> , ¹	Case No. 25-12177 (LSS)
Debtors.	(Jointly Administered)
	Re: Docket No. 458

**ORDER ENLARGING THE TIME
TO FILE NOTICES OF REMOVAL OF RELATED PROCEEDINGS**

Upon the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for the entry of an order (this “Order”), (a) extending the time under Bankruptcy Rule 9027(a) to file notices of removal of civil actions and proceedings to which the Debtors are or may become parties and (b) granting related relief, all as more fully set forth in the Motion; and upon the First Day Declarations; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Debtors having consented to entry of a final order; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and this Court having found that the Debtors’

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² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing, if any, before this Court (the “Hearing”); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT

1. The Motion is GRANTED as set forth herein.
2. Any objections to the entry of this Order, to the extent not withdrawn or settled, are overruled.
3. The Debtors’ Removal Deadline is hereby extended through and including July 7, 2026.
4. This Order is without prejudice to (a) any position the Debtors may take regarding whether section 362 of the Bankruptcy Code applies to stay any litigation pending against the Debtors or (b) the Debtors’ right to seek further extensions of the Removal Deadline.
5. Notice of the Motion as provided therein shall be deemed good and sufficient notice of the Motion, and the requirements of the Bankruptcy Rules and the Local Rules are satisfied by such notice.
6. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.
7. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.