

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)

**SECOND AMENDED² NOTICE OF AGENDA OF MATTERS
SCHEDULED FOR HEARING ON JANUARY 20, 2026 AT 2:30 P.M. (ET)**

This proceeding will be conducted in-person. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom. Please refer to Judge Silverstein’s Chambers Procedures (<https://www.deb.uscourts.gov/judge-laurie-selber-silverstein>) and the Court’s website (<https://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Silverstein’s expectations of remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (ET) the business day before the hearing unless otherwise noticed using the *eCourtAppearances* tool available on the Court’s website.

MATTERS UNDER CERTIFICATION:

1. Debtors’ Motion for an Order (I) Directing Joint Administration of Additional Chapter 11 Cases and (II) Extending Certain Relief Granted to the Original Debtors [[Docket No. 118](#) – filed January 6, 2026]

Response/Objection Deadline: January 13, 2026 at 4:00 p.m. (ET).

Responses/Objections Received: None.

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); and Nine Square Therapeutics, Inc. (4503). The location of the Debtors’ service address in these chapter 11 cases is 230 Park Avenue, Suite 2800, New York, NY 10169.

² **Amended items appear in bold.**



Related Documents:

- A. Certificate of No Objection Regarding Debtors' Motion for an Order (I) Directing Joint Administration of Additional Chapter 11 Cases and (II) Extending Certain Relief Granted to the Original Debtors [[Docket No. 151](#) – filed January 14, 2026]
- B. Second Supplemental Declaration of Perry M. Mandarino, Chief Restructuring Officer of the Debtors, in Support of Chapter 11 Petitions and First Day Motions [[Docket No. 163](#) – filed January 16, 2026]
- C. **Order (I) Directing Joint Administration of Additional Chapter 11 Cases and (II) Extending Certain Relief Granted to the Original Debtors [[Docket No. 178](#) – entered January 20, 2026]**

Status: **On January 20, 2026, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.**

- 2. Debtors' Motion for Entry of an Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, Statements of Financial Affairs, and Rule 2015.3 Financial Reports and (II) Granting Related Relief [[Docket No. 119](#) – filed January 6, 2026]

Response/Objection Deadline: January 13, 2026 at 4:00 p.m. (ET).

Responses/Objections Received: None.

Related Documents:

- A. Certificate of No Objection Regarding Debtors' Motion for Entry of an Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, Statements of Financial Affairs, and Rule 2015.3 Financial Reports and (II) Granting Related Relief [[Docket No. 152](#) – filed January 14, 2026]
- B. **Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, Statements of Financial Affairs, and Rule 2015.3 Financial Reports and (II) Granting Related Relief [[Docket No. 179](#) – entered January 20, 2026]**

Status: **On January 20, 2026, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.**

3. Debtors' Motion for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief [[Docket No. 120](#) – filed January 6, 2026]

Response/Objection Deadline: January 13, 2026 at 4:00 p.m. (ET).

Responses/Objections Received: None.

Related Documents:

- A. Certificate of No Objection Regarding Debtors' Motion for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief [[Docket No. 153](#) – filed January 14, 2026]
- B. Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief [[Docket No. 181](#) – entered January 20, 2026]**

Status: **On January 20, 2026, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.**

MATTERS GOING FORWARD:

4. Debtors' Motion for Entry of Interim and Final Orders to (I) Continue Employee Benefits Programs and (II) Granting Related Relief [[Docket No. 23](#) – filed December 15, 2025]

Response/Objection Deadline: January 6, 2026 at 4:00 p.m. (ET). Extended to January 13, 2026 at 4:00 p.m. (ET).

Responses/Objections Received:

- i. Informal response from the Office of the United States Trustee for the District of Delaware (the "[U.S. Trustee](#)").
- ii. [SEALED/Redacted] Limited Omnibus Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Motion for Entry of Interim and Final Orders to (I) Make and Accept Secured Loans to Portfolio Companies, (II) Authorize to the Extent Outside the Ordinary Course of Business Payment of Management Company Expenses and (III) Granting Related Relief and Debtors' Other Operational Motions and Supplements Thereto [[Docket No. 143/Docket No. 144](#) – filed January 13, 2026] (the "[Omnibus Objection](#)")

Related Documents:

- A. Interim Order Authorizing Debtors to (I) Continue Employee Benefits Programs and (II) Granting Related Relief [[Docket No. 78](#) – entered December 19, 2025]
- B. Notice of Entry of Interim Order and Hearing Regarding Debtors’ Motion for Entry of Interim and Final Orders to (I) Continue Employee Benefits Programs and (II) Granting Related Relief [[Docket No. 80](#) – filed December 19, 2025]
- C. Debtors’ Supplement to Motion for Entry of Interim and Final Orders to (I) Continue Employee Benefits Programs and (II) Grant Related Relief [[Docket No. 124](#) – filed January 6, 2026]
- D. Declaration of Dr. Seth L. Harrison in Support of Chapter 11 Petitions and First Day Motions [[Docket No. 18](#) – filed December 15, 2025]
- E. Declaration of Perry M. Mandarino, Chief Restructuring Officer of the Debtors, in Support of Chapter 11 Petitions and First Day Motions [[Docket No. 25](#) – filed December 15, 2025]
- F. Debtors’ Reply to Limited Omnibus Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors’ Motion for Entry of Interim and Final Orders to (I) Make and Accept Secured Loans to Portfolio Companies, (II) Authorize to the Extent Outside the Ordinary Course of Business Payment of Management Company Expenses and (III) Granting Related Relief and Debtors’ Other Operational Motions and Supplements Thereto [[Docket No. 160](#) – filed January 16, 2026]
- G. Second Supplemental Declaration of Perry M. Mandarino, Chief Restructuring Officer of the Debtors, in Support of Chapter 11 Petitions and First Day Motions [[Docket No. 163](#) – filed January 16, 2026]
- H. Debtors’ Witness and Exhibit List for Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 164](#) – filed January 19, 2026]
- I. Notice of Filing of Further Revised Proposed Final Order Authorizing the Debtors to (I) Continue Employee Benefits Programs and (II) Granting Related Relief [[Docket No. 166](#) – filed January 19, 2026]
- J. Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP Exhibit List for the Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 173](#) – filed January 19, 2026]**
- K. Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP’s Witness List for the Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 175](#) – filed January 19, 2026]**

L. Certification of Counsel Regarding (A) Debtors' Motion for Entry of Interim and Final Orders to (I) Continue Employee Benefits Programs and (II) Granting Related Relief and (B) Debtors' Supplement Thereto [[Docket No. 187](#) – filed January 20, 2026]

Status: On January 20, 2026, the Debtors filed a revised proposed form of final order under certification of counsel resolving the Omnibus Objection and the informal response of the U.S. Trustee. Accordingly, a hearing on this matter is only necessary to the extent the Court has any questions.

5. Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Pre-Petition Obligations Related Thereto, and (C) Continue to Perform Intercompany Transactions, (II) Granting Administrative Expense Status to Post-Petition Intercompany Balances, and (III) Granting Related Relief [[Docket No. 24](#) – filed December 15, 2025]

Response/Objection Deadline: January 13, 2026 at 4:00 p.m. (ET).

Responses/Objections Received:

- i. Informal response from the U.S. Trustee.
- ii. [SEALED/Redacted] Limited Omnibus Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Motion for Entry of Interim and Final Orders to (I) Make and Accept Secured Loans to Portfolio Companies, (II) Authorize to the Extent Outside the Ordinary Course of Business Payment of Management Company Expenses and (III) Granting Related Relief and Debtors' Other Operational Motions and Supplements Thereto [[Docket No. 143/Docket No. 144](#) – filed January 13, 2026]

Related Documents:

- A. Order Authorizing the Debtors to Open New Segregated Bank Account [[Docket No. 79](#) – entered December 19, 2025]
- B. Interim Order (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System and (B) Honor Certain Pre-Petition Obligations Related Thereto, and (II) Granting Related Relief [[Docket No. 107](#) – entered December 31, 2025]
- C. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System and (B) Honor Certain Pre-Petition Obligations Related Thereto, and (II) Granting Related Relief [[Docket No. 108](#) – filed December 31, 2025]

- D. Debtors' Supplement to Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System and (B) Honor Certain Prepetition Obligations Related Thereto, and (II) Granting Related Relief [[Docket No. 122](#) – filed January 6, 2026]
- E. Declaration of Dr. Seth L. Harrison in Support of Chapter 11 Petitions and First Day Motions [[Docket No. 18](#) – filed December 15, 2025]
- F. Declaration of Perry M. Mandarino, Chief Restructuring Officer of the Debtors, in Support of Chapter 11 Petitions and First Day Motions [[Docket No. 25](#) – filed December 15, 2025]
- G. Debtors' Reply to Limited Omnibus Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Motion for Entry of Interim and Final Orders to (I) Make and Accept Secured Loans to Portfolio Companies, (II) Authorize to the Extent Outside the Ordinary Course of Business Payment of Management Company Expenses and (III) Granting Related Relief and Debtors' Other Operational Motions and Supplements Thereto [[Docket No. 160](#) – filed January 16, 2026]
- H. Second Supplemental Declaration of Perry M. Mandarino, Chief Restructuring Officer of the Debtors, in Support of Chapter 11 Petitions and First Day Motions [[Docket No. 163](#) – filed January 16, 2026]
- I. Debtors' Witness and Exhibit List for Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 164](#) – filed January 19, 2026]
- J. Notice of Filing of Further Revised Proposed Final Order (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System and (B) Honor Certain Pre-Petition Obligations Related Thereto, and (II) Granting Related Relief [[Docket No. 165](#) – filed January 19, 2026]
- K. Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP Exhibit List for the Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 173](#) – filed January 19, 2026]**
- L. Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP's Witness List for the Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 175](#) – filed January 19, 2026]**
- M. Certification of Counsel Regarding (A) Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System and (B) Honor Certain Prepetition Obligations Related Thereto, and (II) Granting Related Relief and (B) Debtors' Supplement Thereto [[Docket No. 183](#) – filed January 20, 2026]**

Status: On January 20, 2026, the Debtors filed a revised proposed form of final order under certification of counsel resolving the Omnibus Objection and the informal response of the U.S. Trustee. Accordingly, a hearing on this matter is only necessary to the extent the Court has any questions.

6. [SEALED/Unsealed] Debtors' Motion for an Order (I) Enforcing the Automatic Stay and (II) Imposing Sanctions Against Rigmora [Docket No. 83/[Docket No. 140](#) – filed December 23, 2025/January 9, 2026]

Response/Objection Deadline: January 6, 2026 at 4:00 p.m. (ET).

Responses/Objections Received:

- i. Opposition of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Motion for an Order (I) Enforcing the Automatic Stay and (II) Imposing Sanctions [[Docket No. 117](#) – filed January 6, 2026]

Related Documents:

- A. [SEALED/Unsealed] Declaration of Eric Winston in Support of Debtors' Motion for an Order (I) Enforcing the Automatic Stay and (II) Imposing Sanctions Against Rigmora [Docket No. 84/[Docket No. 141](#) – filed December 23, 2025/January 9, 2026]
- B. Reply in Support of Debtors' Motion for an Order (I) Enforcing the Automatic Stay and (II) Imposing Sanctions Against Rigmora [[Docket No. 150](#) – filed January 14, 2026]
- C. Debtors' Witness and Exhibit List for Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 164](#) – filed January 19, 2026]
- D. Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP Exhibit List for the Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 173](#) – filed January 19, 2026]**
- E. Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP's Witness List for the Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 175](#) – filed January 19, 2026]**

Status: The hearing on this matter is going forward.

7. Debtors' Motion for Entry of Interim and Final Orders to (I) Make and Accept Secured Loans to Portfolio Companies, (II) Authorize to the Extent Outside the Ordinary Course of Business Payment of Management Company Expenses and (III) Grant Related Relief [[Docket No. 89](#) – filed December 23, 2025]

Response/Objection Deadline: January 6, 2026 at 4:00 p.m. (ET). Extended for CSC Leasing Company (“CSC Leasing”) to January 8, 2026 at 4:00 p.m. (ET) and Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP (collectively “Rigmora”) to January 13, 2026.

Responses/Objections Received:

- i. Informal response from CSC Leasing.
- ii. [SEALED/Redacted] Limited Omnibus Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors’ Motion for Entry of Interim and Final Orders to (I) Make and Accept Secured Loans to Portfolio Companies, (II) Authorize to the Extent Outside the Ordinary Course of Business Payment of Management Company Expenses and (III) Granting Related Relief and Debtors’ Other Operational Motions and Supplements Thereto [Docket No. 143/[Docket No. 144](#) – filed January 13, 2026]

Related Documents:

- A. Interim Order to (I) Make and Accept Secured Loans to Portfolio Companies, (II) Authorize to the Extent Outside the Ordinary Course of Business Payment of Management Company Expenses and (III) Grant Related Relief [[Docket No. 102](#) – entered December 30, 2025]
- B. Notice of Entry of Interim Order and Final Hearing Regarding Debtors’ Motion for Entry of Interim and Final Orders to (I) Make and Accept Secured Loans to Portfolio Companies, (II) Authorize to the Extent Outside the Ordinary Course of Business Payment of Management Company Expenses and (III) Grant Related Relief [[Docket No. 104](#) – filed December 30, 2025]
- C. Supplemental Declaration of Perry M. Mandarino, Chief Restructuring Officer of the Debtors, in Support of Chapter 11 Petitions and First Day Motions [[Docket No. 63](#) – filed December 17, 2025]
- D. Declaration of Perry Mandarino in Support of Debtors’ Motion for Entry of Interim and Final Orders to (I) Make and Accept Secured Loans to Portfolio Companies, (II) Authorize to the Extent Outside the Ordinary Course of Business Payment of Management Company Expenses and (III) Grant Related Relief [[Docket No. 90](#) – filed December 23, 2025]

- E. Debtors' Reply to Limited Omnibus Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Motion for Entry of Interim and Final Orders to (I) Make and Accept Secured Loans to Portfolio Companies, (II) Authorize to the Extent Outside the Ordinary Course of Business Payment of Management Company Expenses and (III) Granting Related Relief and Debtors' Other Operational Motions and Supplements Thereto [[Docket No. 160](#) – filed January 16, 2026]
- F. Debtors' Witness and Exhibit List for Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 164](#) – filed January 19, 2026]
- G. Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP Exhibit List for the Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 173](#) – filed January 19, 2026]**
- H. Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP's Witness List for the Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 175](#) – filed January 19, 2026]**

Status: The Debtors have resolved the informal response of CSC Leasing. The hearing on this matter is going forward with respect to the Omnibus Objection.

- 8. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to (A) Pay Their Obligations Under Prepetition Insurance Policies, (B) Continue to Pay Certain Brokerage Fees, (C) Renew, Supplement, Modify, or Purchase Insurance Coverage, and (II) Granting Related Relief [[Docket No. 106](#) – filed December 30, 2025]

Response/Objection Deadline: January 13, 2026 at 4:00 p.m. (ET).

Responses/Objections Received:

- i. Informal response from Rigmora.
- ii. Informal response from the U.S. Trustee.

Related Documents:

- A. Second Supplemental Declaration of Perry M. Mandarino, Chief Restructuring Officer of the Debtors, in Support of Chapter 11 Petitions and First Day Motions [[Docket No. 163](#) – filed January 16, 2026]
- B. Debtors' Witness and Exhibit List for Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 164](#) – filed January 19, 2026]

- C. Notice of Filing of Revised Proposed Order (I) Authorizing the Debtors to (A) Pay Their Obligations Under Prepetition Insurance Policies, (B) Continue to Pay Certain Brokerage Fees, (C) Renew, Supplement, Modify, or Purchase Insurance Coverage, and (II) Granting Related Relief [[Docket No. 167](#) – filed January 19, 2026]
- D. **Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP’s Witness List for the Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 175](#) – filed January 19, 2026]**
- E. **Certification of Counsel Regarding Debtors’ Motion for Entry of an Order (I) Authorizing the Debtors to (A) Pay Their Obligations Under Prepetition Insurance Policies, (B) Continue to Pay Certain Brokerage Fees, (C) Renew, Supplement, Modify, or Purchase Insurance Coverage, and (II) Granting Related Relief [[Docket No. 184](#) – filed January 20, 2026]**

Status: On January 20, 2026, the Debtors filed a revised proposed form of order under certification of counsel resolving the informal responses of Rigmora and the U.S. Trustee. Accordingly, a hearing on this matter is only necessary to the extent the Court has any questions.

- 9. Debtors’ Motion for Entry of an 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. 121](#) – filed January 6, 2026]

Response/Objection Deadline: January 13, 2026 at 4:00 p.m. (ET).

Responses/Objections Received:

- i. Informal response from the U.S. Trustee.
- ii. [SEALED/Redacted] Limited Omnibus Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors’ Motion for Entry of Interim and Final Orders to (I) Make and Accept Secured Loans to Portfolio Companies, (II) Authorize to the Extent Outside the Ordinary Course of Business Payment of Management Company Expenses and (III) Granting Related Relief and Debtors’ Other Operational Motions and Supplements Thereto [[Docket No. 143/Docket No. 144](#) – filed January 13, 2026]

Related Documents:

- A. Debtors' Reply to Limited Omnibus Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Motion for Entry of Interim and Final Orders to (I) Make and Accept Secured Loans to Portfolio Companies, (II) Authorize to the Extent Outside the Ordinary Course of Business Payment of Management Company Expenses and (III) Granting Related Relief and Debtors' Other Operational Motions and Supplements Thereto [[Docket No. 160](#) – filed January 16, 2026]
- B. Debtors' Witness and Exhibit List for Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 164](#) – filed January 19, 2026]
- C. Notice of Filing of Revised Proposed 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. 168](#) – filed January 19, 2026]
- D. Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP Exhibit List for the Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 173](#) – filed January 19, 2026]**
- E. Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP's Witness List for the Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 175](#) – filed January 19, 2026]**
- F. Certification of Counsel Regarding Debtors' Motion for Entry of an 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. 186](#) – filed January 20, 2026]**

Status: **On January 20, 2026, the Debtors filed a revised proposed form of order under certification of counsel resolving the Omnibus Objection and the informal response of the U.S. Trustee. According, a hearing on this matter is only necessary to the extent the Court has any questions.**

- 10. Debtors' Motion Seeking Entry of an Order (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (IV) Granting Related Relief [[Docket No. 123](#) – filed January 6, 2026]

Response/Objection Deadline: January 13, 2026 at 4:00 p.m. (ET).

Responses/Objections Received:

- i. Informal response from Rigmora.
- ii. Informal response from the U.S. Trustee.

Related Documents:

- A. Second Supplemental Declaration of Perry M. Mandarino, Chief Restructuring Officer of the Debtors, in Support of Chapter 11 Petitions and First Day Motions [[Docket No. 163](#) – filed January 16, 2026]
- B. Debtors' Witness and Exhibit List for Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 164](#) – filed January 19, 2026]
- C. Notice of Filing of Revised Proposed Order (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (IV) Granting Related Relief [[Docket No. 169](#) – filed January 19, 2026]
- D. Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP's Witness List for the Hearing on January 20, 2026 at 2:30 p.m. (ET) [[Docket No. 175](#) – filed January 19, 2026]**
- E. Certification of Counsel Regarding Debtors' Motion Seeking Entry of an Order (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (IV) Granting Related Relief [[Docket No. 185](#) – filed January 20, 2026]**

Status: **On January 20, 2026, the Debtors filed a revised proposed form of order under certification of counsel resolving the informal responses of Rigmora and the U.S. Trustee. Accordingly, a hearing on this matter is only necessary to the extent the Court has any questions.**

11. Motion of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to File Under Seal Exhibit B Attached to the Limited Objection [[Docket No. 156](#) – filed January 15, 2026]

Response/Objection Deadline: At the hearing.

Responses/Objections Received:

i. Informal response from the U.S. Trustee.

Related Documents:

- A. [SEALED] Limited Omnibus Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Motion for Entry of Interim and Final Orders to (I) Make and Accept Secured Loans to Portfolio Companies, (II) Authorize to the Extent Outside the Ordinary Course of Business Payment of Management Company Expenses and (III) Granting Related Relief and Debtors' Other Operational Motions and Supplements Thereto [Docket No. 143 – filed January 13, 2026]

- B. [Redacted] Limited Omnibus Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Motion for Entry of Interim and Final Orders to (I) Make and Accept Secured Loans to Portfolio Companies, (II) Authorize to the Extent Outside the Ordinary Course of Business Payment of Management Company Expenses and (III) Granting Related Relief and Debtors' Other Operational Motions and Supplements Thereto [[Docket No. 144](#) – filed January 13, 2026]

Status: This matter is going forward.

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Dated: January 20, 2026
Wilmington, Delaware

Andrew M. Berdon, Esq. (admitted *pro hac vice*)
Patricia B. Tomasco, Esq. (admitted *pro hac vice*)
Rachel E. Epstein, Esq. (admitted *pro hac vice*)
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Respectfully submitted,

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Proposed Counsel to the Debtors and Debtors in Possession