Docket #0003 Date Filed: 5/11/2026

RICHARDS LAYTON & FINGER

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May 11, 2026

VIA HAND DELIVERY

The Honorable Jennifer L. Hall
J. Caleb Boggs Federal Building
844 N. King Street
Unit 17
Room 6312
Wilmington, Delaware 19801

Re: ***Rigmora Biotech Investor One LP, et al., v. Apple Tree Life Sciences, Inc., et al.*, C.A. No. 26-cv-495 (JLH), BAP No. 26-23**

Dear Judge Hall:

This firm, along with the firm of Debevoise & Plimpton LLP, is counsel to Rigmora Biotech Investor One LP, by its general partner Unicorn Biotech Ventures One Ltd, and Rigmora Biotech Investor Two LP, by its general partner Unicorn Biotech Ventures Two Ltd (collectively, the "**Appellants**").[1]

For the reasons set forth in the enclosed *Stipulation and Order Regarding Addition of Party* (the "**Stipulation and Order**"), subject to Your Honor's approval, all of the parties to the Action agree that the Committee should be added as an appellee in the Action.

Consequently, the Appellants respectfully request that Your Honor enter and approve the Stipulation and Order at Your Honor's earliest convenience.

Counsel is available should Your Honor have any questions.

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[1] Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Stipulation and Order.

Respectfully,

/s/ Michael J. Merchant

Michael J. Merchant (No. 3854)

cc (via email): Justin R. Alberto
Jack M. Dougherty
L. Katherine Good
Brett M. Haywood
Andrew M. Berdon
Patricia B. Tomasco
Eric D. Winston

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

In re: Apple Tree Life Sciences, Inc., *et al*., Debtors. [1]	Chapter 11 Case No. 25-12177 (LSS) (Jointly Administered)
Rigmora Biotech Investor One LP, *et al*., Appellants, v. Apple Tree Life Sciences, Inc., *et al*., Appellees.	C.A. No. 26-cv-495 (JLH) BAP No. 26-23

STIPULATION AND ORDER REGARDING ADDITION OF PARTY

WHEREAS, on December 9, 2025, the above-captioned debtors and debtors in possession (the "**Debtors**" or "**Appellees**") commenced chapter 11 cases in the United States Bankruptcy Court for the District of Delaware (the "**Bankruptcy Court**") by filing voluntary petitions for relief under chapter 11 of title 11 of the United States Code;

WHEREAS, on January 23, 2026, Rigmora Biotech Investor One LP, by its general partner Unicorn Biotech Ventures One Ltd, and Rigmora Biotech Investor Two LP, by its general partner Unicorn Biotech Ventures Two Ltd (collectively, the "**Rigmora LPs**" or the "**Appellants**") filed the *[Sealed] Amended Motion of Rigmora Biotech Investor One LP and*

[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.

Rigmora Biotech Investor Two LP for an Order Dismissing the Bankruptcy Cases of ATP Life Science Ventures L.P. and ATP III GP, Ltd. [Docket No. 204; Redacted at Docket No. 205][2] (the "**Dismissal Motion**");

WHEREAS, on January 30, 2026, the Debtors filed the *[Sealed] Debtors' Opposition to Rigmora's Motion to Dismiss* [Docket No. 245; Redacted at Docket No. 260] (the "**Opposition**");

WHEREAS, on January 30, 2026, the Official Committee of Unsecured Creditors (the "**Committee**") filed the *Omnibus Joinder of the Official Committee of Unsecured Creditors to the Debtors' Oppositions to Rigmora's (I) Motion for Relief from the Automatic Stay and (II) Dismissal Motion* [Docket No. 247];[3]

WHEREAS, on April 14, 2026, the Court entered the *Order Denying Amended Motion to Dismiss* [Docket No. 550] (the "**Bankruptcy Court Order**") and the accompanying *Memorandum Opinion* [Docket No. 548];

WHEREAS, on April 28, 2026, the Appellants filed the *Notice of Appeal* [Docket No. 601] with the Bankruptcy Court, appealing the Bankruptcy Court Order to the United States District Court for the District of Delaware (this "**Court**"), naming the Debtors as Appellees;

WHEREAS, on April 29, 2026, the above-captioned civil action (the "**Action**") was commenced in this Court;

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[2] All docket references shall refer to the docket in the above-captioned chapter 11 proceedings with the Bankruptcy Court.

[3] Separate from the Dismissal Motion, the Rigmora LPs filed the *Motion of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP for Relief from the Automatic Stay* [Docket No. 125] (the "**Lift Stay Motion**"). In response, the Debtors filed the *Debtors' Opposition to the Rigmora LPs' Motion for Relief from the Automatic Stay* [Docket No. 244]. The order granting in part the Lift Stay Motion is not being appealed here.

WHEREFORE, IT IS HEREBY STIPULATED by the Appellants, the Committee, and the Debtors, subject to approval of the Court, that the Committee shall be added as an appellee in the Action.

Dated: May 11, 2026
Wilmington, Delaware

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Dated: May 11, 2026
Wilmington, Delaware

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Dated: May 11, 2026
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Counsel to the Debtors and Debtors in Possession

STIPULATION AND ORDER REGARDING ADDITION OF PARTY

IT IS SO ORDERED this ___ day of _____, 2026.

_____
United States District Court Judge