IN THE UNITED STATES DISTRICT 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)
Rigmora Biotech Investor One LP, *et al.*, Appellants, v. Apple Tree Life Sciences, Inc., *et al.*, Appellees.	Civil Action No. 26-cv-495(JLH) BAP No. 26-23

APPELLEES' DESIGNATION OF ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), as supplemented by Rule 8009-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware, Appellee Apple Tree Life Sciences, Inc. and its affiliated debtors and debtors in possession (the "Appellees" or "Debtors"), by and through their undersigned counsel, hereby respectfully submit this designation of additional items to be included in the record on appeal (this "Counterstatement") with respect to the appeal by Appellant Rigmora Biotech Investor One LP, by and through its general partner Unicorn Biotech Ventures One Ltd, and Rigmora Biotech Investor Two LP, by and through its general partner Unicorn Biotech Ventures

[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, Inc. (8493). The location of the Debtors' service address in these chapter 11 cases is 230 Park Avenue, Suite 2800, New York, NY 10169.

Two Ltd (collectively, "Appellant" or "Rigmora") from the *Order Denying Amended Motion to Dismiss* [Docket No. 550] and accompanying *Memorandum Opinion* [Docket No. 548] entered by the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court"), on April 14, 2026.

ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL

Appellees hereby counter-designate the following additional items to be included in the record on appeal:

Item No.	Docket No. / Exhibit No.	Filing Date	Title
1	--	5/30/2025	*ATP III GP, Ltd. v. Rigmora Biotech Inv. One LP*, C.A. No. 2025-0607-KSJM (Del. Ch. May 30, 2025)
2	--	12/11/2025	Partial Final J. and Order Pursuant to Rule 54(b), *ATP III GP, Ltd. v. Rigmora Biotech Inv. One LP*, C.A. No. 2025-0607-KSJM (Del. Ch. Dec. 11, 2025)
3	D.I. 3	12/12/2025	[SEALED] *Motion of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP for an Order (I) Dismissing the Chapter 11 Cases and/or (II) Granting Relief from the Automatic Stay*
4	D.I. 5	12/12/2025	*Motion to Shorten Notice and Objection Periods for the Motion of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP for an Order (I) Dismissing the Chapter 11 Cases and/or (II) Granting Relief from the Automatic Stay*
5	D.I. 7	12/13/2025	[REDACTED] *Motion of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP for an Order (I) Dismissing the Chapter 11 Cases and/or (II) Granting Relief from the Automatic Stay*
6	D.I. 102	12/30/2025	*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*
7	D.I. 125	1/6/2026	*Motion of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP Relief from the Automatic Stay*

Item No.	Docket No. / Exhibit No.	Filing Date	Title
8	D.I. 131	1/8/2026	*Debtors' Motion for Entry of an Order (I) Approving the Retention and Employment of B. Riley Restructuring Services, LLC to Provide the Debtors with a Chief Restructuring Officer and Additional Staff Effective as of the Petition Date; (II) Designating Perry M. Mandarino as the Chief Restructuring Officer to the Debtors; and (III) Granting Related Relief*
9	D.I. 132	1/8/26	*Debtors' Application for an Order Authorizing the Retention and Employment of Quinn Emanuel Urquhart & Sullivan, LLP as Co-Counsel for the Debtors Effective as of the Petition Date*
10	D.I. 206	1/24/2026	*Final 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*
11	D.I. 211	1/27/2026	*Certification of Counsel Regarding Proposed Scheduling Order for Contested Motions*
12	D.I. 224	1/29/26	[SEALED] *Limited Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Application for an Order Authorizing the Retention and Employment of Quinn Emanuel Urquhart & Sullivan, LLP as Co-Counsel for the Debtors Effective as of the Petition Date*
13	D.I. 225	1/29/26	[SEALED] *Limited Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Motion for Entry of an Order (I) Approving the Retention and Employment of B. Riley Restructuring Services, LLC to Provide the Debtors with a Chief Restructuring Officer and Additional Staff Effective as of the Petition Date; (II) Designating Perry M. Mandarino as the Chief Restructuring Officer to the Debtors; and (III) Granting Related Relief*
14	D.I. 226	1/29/26	[REDACTED] *Limited Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Application for an Order Authorizing the Retention and Employment of Quinn Emanuel Urquhart & Sullivan, LLP as Co-Counsel for the Debtors Effective as of the Petition Date*

Item No.	Docket No. / Exhibit No.	Filing Date	Title
15	D.I. 227	1/29/26	[REDACTED] *Limited Objection of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP to Debtors' Motion for Entry of an Order (I) Approving the Retention and Employment of B. Riley Restructuring Services, LLC to Provide the Debtors with a Chief Restructuring Officer and Additional Staff Effective as of the Petition Date; (II) Designating Perry M. Mandarino as the Chief Restructuring Officer to the Debtors; and (III) Granting Related Relief*
16	D.I. 236	1/30/2026	*Schedules of Assets and Liabilities for Apple Tree Life Sciences, Inc.*
17	D.I. 244	1/30/2026	*Debtors' Opposition to the Rigmora LPs' Motion for Relief from the Automatic Stay*
18	D.I. 248	2/2/2026	*Scheduling Order for Contested Motions*
19	D.I. 313	2/13/2026	*Debtors' Motion for Entry of Interim and Final Orders: (A) Authorizing the Debtors to Incur Post-Petition Debt, (B) Granting Super-Priority Administrative Expense Claims, (C) Scheduling a Final Hearing, and (D) Granting Related Relief*
20	D.I. 349	2/17/26	*Supplemental Declaration of Perry M. Mandarino in Support of Debtors' Motion for Entry of an Order (I) Approving the Retention and Employment of B. Riley Restructuring Services, LLC to Provide the Debtors with a Chief Restructuring Officer and Additional Staff Effective as of the Petition Date; (II) Designating Perry M. Mandarino as the Chief Restructuring Officer to the Debtors; and (III) Granting Related Relief*
21	D.I. 370	2/18/2026	*Reply in Support of Motion of Rigmora Biotech Investor One LP and Rigmora Biotech Investor Two LP for Relief from the Automatic Stay*
22	D.I. 429	3/4/2026	*Schedules of Assets and Liabilities for Apertor Pharmaceuticals, Inc.*
23	D.I. 431	3/4/2026	*Schedules of Assets and Liabilities for Initial Therapeutics, Inc.*
24	D.I. 433	3/4/2026	*Schedules of Assets and Liabilities for Marlinspike Therapeutics, Inc.*
25	D.I. 435	3/4/2026	*Schedules of Assets and Liabilities for Red Queen Therapeutics, Inc.*
26	D.I. 439	3/4/2026	*Schedules of Assets and Liabilities for Nine Square Therapeutics, Inc.*

Item No.	Docket No. / Exhibit No.	Filing Date	Title
27	D.I. 441	3/4/2026	*Schedules of Assets and Liabilities for Nereid Therapeutics Incorporated*
28	D.I. 446	3/5/2026	*Schedules of Assets and Liabilities for Evercrisp Biosciences, Inc.*

RESERVATION OF RIGHTS

Appellees reserve all rights to amend or supplement this Counterstatement, including, without limitation, the right to identify additional issues on appeal and to designate further documents for inclusion in the record as may be appropriate.

[*Signature Page Follows*]

Dated: May 26, 2026
Wilmington, Delaware

Respectfully submitted,

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