**IN THE UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF DELAWARE**

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

**STIPULATION AND [PROPOSED] ORDER TO AMEND**
**BRIEFING SCHEDULE**

WHEREAS, this stipulation ("Stipulation") is made and entered into by and among 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 Two Ltd (collectively, "Appellant" or "Rigmora"), Appellee Apple Tree Life Sciences, Inc. and its affiliated debtors and debtors in possession (the "Debtors"), and Appellee the Official Committee of Unsecured Creditors (the "Committee" and together with the Debtors, the "Appellees").

[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.

WHEREAS, the Appellants and Appellees (collectively with the Officeholders, the "Parties") hereby stipulate and agree as follows:

1. On April 29, 2026, the Appellants filed the *Notice of Appeal* [Bankr. Dkt. No. 601] in the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court"), appealing the *Order Denying Amended Motion to Dismiss* [Bankr. Docket No. 550] and accompanying *Memorandum Opinion* [Bankr. Docket No. 548][2] entered by the Bankruptcy Court on April 14, 2026, thereby commencing the instant bankruptcy appeal (the "Bankruptcy Appeal").

2. On April 14, 2026, the Bankruptcy Court denied Appellant's motion to dismiss the bankruptcy cases of the ATP Life Science Ventures, L.P. (the "Fund") and ATP III GP, Ltd. (the "GP") and granted limited relief from the automatic stay to permit the parties to proceed in the Cayman Court on two issues: whether Rigmora could prove that it had justifiably and irretrievably lost all trust and confidence in the GP's ability to manage the Fund and/or whether the Fund had lost its substratum. On June 30 and July 1, 2026, the Cayman Court held a trial on whether the Fund has lost its substratum, and on July 10, 2026, the Cayman Court appointed two officeholders to act in the stead of the GP.

3. On July 13, 2026, Alexander Lawson and Barry Lynch, in their capacities as Cayman Islands-appointed joint officeholders (the "Officeholders") filed with the Bankruptcy Court the *Motion of Alexander Lawson and Barry Lynch, in Their Capacities as Cayman-Appointed Officeholders, for an Order (I) Recognizing Their Appointment as Officeholders, (II) Clarifying the Scope of Their Powers and Duties in the Chapter 11 Cases, and (III) Granting Related Relief* [Docket No. 926] (the "Recognition Motion") seeking recognition of their appointment and clarification of the scope of their powers and duties in the chapter 11 cases.

[2] Capitalized terms used but not defined herein shall have the definitions ascribed to them in the Opinion.

4. The Parties have since conferred, and agree, subject to the Court's approval, to amend the briefing schedule set forth at Dkt. No. 28 to allow the Parties sufficient time to resolve the Recognition Motion and clarify the role of the Officeholders in this Bankruptcy Appeal.

**IT IS HEREBY STIPULATED AND AGREED** by the parties, and subject to the approval of the Court, that the briefing schedule shall be amended as follows:

| Event | Current Deadline | Amended Deadline |
|---|---|---|
| Deadline for Appellees' answering brief(s) | July 29, 2026 | August 28, 2026 |
| Deadline for Appellants' reply brief | August 12, 2026 | September 11, 2026 |

Dated: July 28, 2026

Respectfully submitted,

*/s/ L. Katherine Good*

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SO ORDERED this ____ day of _____, 2026

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The Honorable Jennifer L. Hall
United States District Judge