IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Apple Tree Life Sciences, Inc., *et al*.,[1]	Case No. 25-12177 (LSS)
Debtors.	(Jointly Administered)
	Hearing Date: November 10, 2026 at 10:00 a.m. (ET) **Objection Deadline: November 3, 2026 at 4:00 p.m. (ET)**

SUMMARY OF FIRST AND FINAL APPLICATION OF VERNON FLYNN KC, AKASH SONECHA, AND ANSON CHEUNG FOR COMPENSATION FOR SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES AS SUPPLEMENTAL CAYMAN ISLANDS COUNSEL TO THE DEBTORS FOR THE PERIOD MAY 14, 2026 THROUGH AUGUST 3, 2026

Name of Applicants:	Vernon Flynn KC, Akash Sonecha, & Anson Cheung
Authorized to Provide Professional Services to:	Debtors
Date of Retention:	August 26, 2026 effective as of May 14, 2026
Period for which compensation and reimbursement are sought:	May 14, 2026 through August 3, 2026
Amount of Compensation sought as actual, reasonable, and necessary:	$3,019,500.00
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	$6,827.81[2]

This is a(n): ___ monthly ___ interim __X__ final application

[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.

[2] The amount of compensation sought and amount of expenses to be reimbursed were originally provided in Great British Pounds and have been converted to United States Dollars using the conversion rate (x1.32) as of the date of preparation of this application (October 1, 2026).

2512177261020000000000007

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Apple Tree Life Sciences, Inc., *et al*.,[1]	Case No. 25-12177 (LSS)
Debtors.	(Jointly Administered)
	Hearing Date: November 10, 2026 at 10:00 a.m. (ET) **Objection Deadline: November 3, 2026 at 4:00 p.m. (ET)**

FIRST AND FINAL APPLICATION OF VERNON FLYNN KC, AKASH SONECHA, AND ANSON CHEUNG FOR COMPENSATION FOR SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES AS SUPPLEMENTAL CAYMAN ISLANDS COUNSEL TO THE DEBTORS FOR THE PERIOD MAY 14, 2026 THROUGH AUGUST 3, 2026

Pursuant to Sections 330 and 331 of title 11 of the United States Code, §§ 101-1532 (the "Bankruptcy Code"), rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and in accordance with that certain *Order Pursuant to 11 U.S.C. §§ 327 and 328(a), Fed. R. Bankr. P. 2014 and 2016, and Local Rules 2014-1 and 2016-1 Authorizing the Employment and Retention of Vernon Flynn KC, Akash Sonecha, and Anson Cheung as Supplemental Cayman Islands Counsel to the Debtors Effective as of May 14, 2026* [Docket No. 1084] (the "Retention Order"),[2] the Barristers hereby file this *First and Final Application of Vernon Flynn KC, Akash Sonecha, and Anson Cheung for Compensation for Services Rendered and for Reimbursement of Expenses as Supplemental Cayman Islands Counsel to the Debtors for the Period May 14, 2026 Through August 4, 2026* (this "Application"). By this Application, the Barristers

[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.

[2] Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Retention Order.

seek a final allowance with respect to sums of $3,019,500.00 as compensation for professional fees and $6,827.81 as reimbursement of actual and necessary expenses, for a total of $3,026,327.81, for the period May 14, 2026, through August 3, 2026 (the "Compensation Period"). In support of this Application, the Barristers respectfully represent as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the "Court") has jurisdiction over this Application 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.

2. Pursuant to Local Rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), the Debtors confirm their consent to the entry of a final order by the Court in connection with this Application to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The statutory bases for the relief sought herein are sections 327(e) and 328(a) of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Local Rules 2014-1 and 2016-1.

BACKGROUND

5. On December 9 and 15, 2025, and January 1 and 15, 2026 (the "Petition Dates"), the Debtors commenced these chapter 11 cases by filing petitions for relief under chapter 11 of the Bankruptcy Code (the "Chapter 11 Cases").

6. The Debtors continue to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee has been appointed in these Chapter 11 Cases.

7. On April 10, 2026, the Court entered the *Order Appointing Fee Examiner and Establishing Related Procedures Concerning Compensation and Reimbursement of Expenses of Professionals and Members of Official Committees and Consideration of Fee Applications* [Docket No. 527].

8. On January 20, 2026, the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee") appointed the official committee of unsecured creditors (the "Committee") in connection with these Chapter 11 Cases. *See* Docket No. 194.

9. The Barristers were retained effective as May 14, 2026, by the Retention Order, dated August 26, 2026 [Docket No. 1084]. The Retention Order authorized the Barristers to be compensated and to be reimbursed pursuant to the terms set forth in the *Debtors' Application for an Order (I) Authorizing the Employment and Retention of Vernon Flynn KC, Akash Sonecha, and Anson Cheung as Supplemental Cayman Islands Counsel to the Debtors Effective as of May 14, 2026; (II) Waiving Certain Information Requirements of Local Rule 2016-1; and (III) Granting Related Relief* [Docket No. 805] (the "Retention Application").[3]

SUMMARY OF SERVICES RENDERED

10. Attached hereto as **Exhibit C** is a summary of the work done by each Barrister for the Debtors during the Compensation Period in accordance with the Retention Order.

11. A detailed statement of fees incurred during the Compensation Period, showing the amount of $3,019,500.00 due for fees is also attached hereto as **Exhibit D**.

[3] The Retention Order also explicitly excused the Barristers from the requirements of Bankruptcy Rule 2016(a) and Local Rule 2016-1 to maintain and/or provide detailed time records in accordance with the U.S. Trustee Fee Guidelines.

ACTUAL AND NECESSARY EXPENSES

12. Vernon Flynn KC has incurred out-of-pocket expenses during the Compensation Period in the amount of $6,827.81. Attached as **Exhibit B** is a detailed statement of expenses paid during the Compensation Period. This out-of-pocket disbursement sum is broken down into the following categories of charges: Certificate of Good Standing, Police Certificate, Flights and Hotel.

VALUATION OF SERVICES

13. The Barristers expended a total of 1,170 hours and 9 minutes in connection with this matter during the Compensation Period.

14. The amount of time spent by each of these persons in providing services to the Debtors for the Compensation Period is set forth in detail and attached hereto as **Exhibit C**. The reasonable value of the services rendered by the Barristers for the Compensation Period as Supplemental Cayman Islands Counsel for the Debtors in these cases is $3,019,500.00.[4]

15. The Barristers' fees are in the form of non-refundable interim payments or "brief" fees; essentially a flat fee structure. "Brief" fees are common for English barristers, especially when a matter is a discrete one, like the "loss of substratum" trial. This is due to the unique and specialized nature of the legal system in England and Wales. As a general matter, barristers in England and Wales are independent and self-employed, as opposed to being members of law firms. As a result of agreeing to represent the Debtors in the Cayman Proceedings, the Barristers have foregone other matters and have committed significant time and resources almost exclusively to

[4] The Barristers' fees are broken down as follows: ***(i)*** Vernon Flynn, KC: a flat fee of $1,980,000.00; ***(ii)*** Anson Cheung: a flat fee of $594,000.00; and ***(iii)*** Akash Sonecha: a flat fee of $445,500.00. The differences in the juniors' fees account for the fact that Akash was only instructed to assist Vernon until July 15, 2026, whereas Anson was instructed to assist Vernon in his representation of the Debtors throughout the entire duration of the Cayman Proceedings until August 4, 2026.

advising the client and preparing for the relevant hearing, including the significant undertaking of becoming familiar with the history of the matter and all the underlying documents. It is accordingly rare that a barrister would be engaged to represent a client at trial without there being an agreed fixed fee for the period leading up to and during trial, especially in circumstances like in this case, where the instruction was at very short notice and was likely to be extremely time consuming and demanding. The fixed fee structure used by the Barristers in this case accounted for the possibility of the relevant hearing not going forward, in that it was agreed that installments of fees would be deemed incurred at intervals leading up to the hearing provided that the Barristers continued to be retained through the next interval date. If the relevant hearing were to have been settled, or the Barristers' services were no longer needed for some other reason, then the engagement would have been terminated prior to the next fee installment date, and such further fees would not be deemed incurred.

16. The Debtors received proposals from four (4) different barristers before instructing Mr Flynn. All of those barristers proposed a "brief" fee. Mr. Flynn's proposal was not the most expensive of the proposals received; indeed, it was significantly less expensive than the other King's Counsel who was originally approached and who was both available and had the requisite experience. Anson Cheung and Akash Sonecha's fees were subsequently independently negotiated.

17. As set forth in the Retention Application and on the record at the hearing preceding the Retention Order, the Court entered the Retention Order approving the Barristers' retention under section 328 of the Bankruptcy Code, finding the fees requested in the Retention Application reasonable under that section.

18. This Application covers the fee period from May 14, 2026, through and including August 4, 2026.

CONCLUSION

WHEREFORE, the Barristers respectfully requests allowance be made to them in the sum of $3,019,500.00 as compensation for necessary professional services rendered to the Debtors for the Compensation Period, and the sum of $6,827.81 as reimbursement of actual necessary costs and expenses incurred during that period, and requests such other and further relief as the Court may deem just and proper.

Dated: October 20, 2026

Respectfully submitted,

/s/ Vernon Flynn
Vernon Flynn KC

/s/ Akash Sonecha
Akash Sonecha

/s/ Anson Cheung
Anson Cheung

FLYNN VERIFICATION

I, Vernon Flynn KC, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following statements are true and correct to the best of my knowledge and based on the information and records available to me:

a) I am a barrister and King's Counsel practicing in England as an independent practitioner and a member of the Brick Court Chambers, and I am an independent contractor engaged by Walkers (Cayman) LLP, Cayman Islands counsel to the Debtors in these Chapter 11 Cases.

b) I am familiar with the work I and the other Barristers performed on behalf of the Debtors.

c) I have reviewed the foregoing Application, and the facts set forth therein are true and correct to the best of my knowledge, information and belief. Moreover, I have reviewed Del. Bankr. L.R. 2016-1 and to the best of my knowledge and belief submit that the Application substantially complies with such rule as modified by the Retention Order.

/s/ Vernon Flynn
Vernon Flynn KC

SONECHA VERIFICATION

I, Akash Sonecha, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following statements are true and correct to the best of my knowledge and based on the information and records available to me:

a) I am a barrister practicing in England as an independent practitioner and a member of the Essex Court Chambers, and I am an independent contractor engaged by Walkers (Cayman) LLP, Cayman Islands counsel to the Debtors in these Chapter 11 Cases.

b) I am familiar with the work I and the other Barristers performed on behalf of the Debtors.

c) I have reviewed the foregoing Application, and the facts set forth therein are true and correct to the best of my knowledge, information and belief. Moreover, I have reviewed Del. Bankr. L.R. 2016-1 and to the best of my knowledge and belief submit that the Application substantially complies with such rule as modified by the Retention Order.

/s/ Akash Sonecha
Akash Sonecha

CHEUNG VERITIFCATION

I, Anson Cheung, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following statements are true and correct to the best of my knowledge and based on the information and records available to me:

a) I am a barrister practicing in England as an independent practitioner and a member of the 4 New Square Chambers, and I am an independent contractor engaged by Walkers (Cayman) LLP, Cayman Islands counsel to the Debtors in these Chapter 11 Cases.

b) I am familiar with the work I and the other Barristers performed on behalf of the Debtors.

c) I have reviewed the foregoing Application, and the facts set forth therein are true and correct to the best of my knowledge, information and belief. Moreover, I have reviewed Del. Bankr. L.R. 2016-1 and to the best of my knowledge and belief submit that the Application substantially complies with such rule as modified by the Retention Order.

/s/ Anson Cheung
Anson Cheung

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Apple Tree Life Sciences, Inc., *et al*.,[1]	Case No. 25-12177 (LSS)
Debtors.	(Jointly Administered)
	Hearing Date: November 10, 2026 at 10:00 a.m. (ET) **Objection Deadline: November 3, 2026 at 4:00 p.m. (ET)**

NOTICE OF FIRST AND FINAL APPLICATION OF VERNON FLYNN KC, AKASH SONECHA, AND ANSON CHEUNG FOR COMPENSATION FOR SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES AS SUPPLEMENTAL CAYMAN ISLANDS COUNSEL TO THE DEBTORS FOR THE PERIOD MAY 14, 2026 THROUGH AUGUST 3, 2026

PLEASE TAKE NOTICE that the above-captioned debtors and debtors in possession (the "Debtors") filed the *First and Final Application of Application of Vernon Flynn KC, Akash Sonecha, and Anson Cheung for Compensation for Services Rendered and for Reimbursement of Expenses as Supplemental Cayman Islands Counsel to the Debtors for the Period May 14, 2026 Through August 3, 2026* (the "Application") with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that objections to the Application, if any, are required to be filed on or before **November 3, 2026 at 4:00 p.m. (ET)** (the "Objection Deadline") with the Clerk of the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 North Market Street, Wilmington, Delaware 19801.

[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.

PLEASE TAKE FURTHER NOTICE that objections to the Application, if any, must be served upon and received by the following Application Recipients: (i) co-counsel to the Debtors, (a) Quinn Emanuel Urquhart & Sullivan, LLP, 295 5th Avenue, 9th Floor, New York, New York 10016 (Attn: Andrew M. Berdon (andrewberdon@quinnemanuel.com) and Patricia B. Tomasco (pattytomasco@quinnemanuel.com)) and Quinn Emanuel Urquhart & Sullivan, LLP, 865 S. Figueroa Street, 10th Floor, Los Angeles, California 90017 (Attn: Eric D. Winston (ericwinston@quinnemanuel.com)); (b) Potter Anderson & Corroon LLP, 1313 N. Market Street, 6th Floor, Wilmington, Delaware 19801-6108 (Attn: L. Katherine Good (kgood@potteranderson.com) and Brett M. Haywood (bhaywood@potteranderson.com)); and (c) Murphy & King, P.C., 28 State Street, Suite 3101, Boston, Massachusetts 02109 (Attn: Harold B. Murphy (hmurphy@murphyking.com) and Andrew G. Lizotte (alizotte@murphyking.com)) (ii) the U.S. Trustee, J. Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801 (Attn: Hannah McCollum (hannah.mccollum@usdoj.gov) and Megan Seliber (megan.seliber@usdoj.gov)); (iii) counsel to the Committee, Cole Schotz P.C., 500 Delaware Avenue, Suite 600, Wilmington, Delaware 19801 (Attn: Justin R. Alberto (jalberto@coleschotz.com) and Patrick J. Reilley (preilley@coleschotz.com) and (iv) the Court Appointed Fee Examiner, Rucki Fee Review, LLC, 1111 Windon Drive, Wilmington, Delaware 19803 (Attn: Justin Rucki (justinrucki@ruckifeereview.com)).

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Application will be held before The Honorable Laurie Selber Silverstein at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801 on **November 10, 2026 at 10:00 a.m. (ET)**.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: October 20, 2026
Wilmington, Delaware

Respectfully submitted,

/s/ Halley S. Dannemiller

L. Katherine Good (No. 5101)
Brett M. Haywood (No. 6166)
Shannon A. Forshay (No. 7293)
Ethan H. Sulik (No. 7270)
Halley S. Dannemiller (No. 7562)
POTTER ANDERSON & CORROON LLP
1313 N. Market Street, 6th Floor
Wilmington, Delaware 19801
Telephone: (302) 984-6000
Facsimile: (302) 658-1192
Email: kgood@potteranderson.com
bhaywood@potteranderson.com
sforshay@potteranderson.com
esulik@potteranderson.com

Andrew M. Berdon, Esq. (admitted *pro hac vice*)
Patricia B. Tomasco, Esq. (admitted *pro hac vice*)
Rachel E. Epstein, Esq. (admitted *pro hac vice*)
Alain Jaquet, Esq. (admitted *pro hac vice*)
Rachel Harrington, Esq. (admitted *pro hac vice*)
QUINN EMANUEL URQUHART & SULLIVAN, LLP
295 5th Avenue, 9th Floor
New York, New York 10016
Telephone: (212) 849-7000
Facsimile: (212) 849-7100
Email: andrewberdon@quinnemanuel.com
pattytomasco@quinnemanuel.com
rachelepstein@quinnemanuel.com
alainjaquet@quinnemanuel.com
rachelharrington@quinnemanuel.com

-and-

Eric D. Winston, Esq. (admitted *pro hac vice*)
Razmig Izakelian, Esq. (admitted *pro hac vice*)
Benjamin Roth, Esq. (admitted *pro hac vice*)
QUINN EMANUEL URQUHART & SULLIVAN, LLP
865 S. Figueroa Street, 10th Floor
Los Angeles, California 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100
Email: ericwinston@quinnemanuel.com
razmigizakelian@quinnemanuel.com
benroth@quinnemanuel.com

Counsel to the Debtors and Debtors in Possession Other Than the Fund Debtor

EXHIBIT A

Applicant	Period	Fees Requested to be Paid	Expenses Requested to be Paid	Fees and Expenses Authorized
Vernon Flynn KC	May 15, 2026 – August 3, 2026	$1,980,000.00	$6,827.81	$1,986,827.81
Akash Sonecha	May 28, 2026 – July 15, 2026	$445,500.00	$0.00	$445,500.00
Anson Cheung	May 28, 2026 – August 3, 2026	$594,000.00	$0.00	$594,000.00
TOTALS		**$3,019,500.00**	**$6,827.81**	**$3,026,327.81**

EXHIBIT B

EXPENSE CATEGORY[1]
May 14, 2026 through August 3, 2026

Expense Category	Amount
Certificate of Good Standing	$47.52
Police Certificate	$165.00
Flights	$529.45
Hotel	$277.85
Flights	$5,807.99
TOTAL	**$6,827,81**

[1] Itemized breakdown provided at Exhibit E.

EXHIBIT C

HOURS SUMMARY

VERNON FLYNN KC

Date	Notes	Duration
05/15/2026	Received initial instructions from Walkers sending electronic copies of the pleadings in the Cayman winding-up petition and parallel writ proceedings, together with injunction orders and the December 2025 witness evidence bundle. Acknowledged instructions, confirmed preference to work from electronic bundles only, and requested further material on directions for the forthcoming hearings, prior skeletons and transcripts from the earlier hearings before Asif J, and any existing thinking on the intended approach to the forthcoming hearings	2h 30m
05/16/2026	Began substantive reading-in across the core Cayman materials, focusing on the Amended Winding-Up Petition, the Amended Defence and Amended Reply, and the parallel writ pleadings concerning the 30 May 2025 capital calls. Reviewed the injunction orders of Asif J dated 20 June 2025 and 1 August 2025 to understand the interim relief granted, the restriction on capital calls and default notices, and the relationship with validation issues under the Companies Act. Skimmed the December 2025 witness evidence in order to identify how the GP, the Rigmora entities and other limited partners had presented the capital-call and budget-approval history, the Braeburn and Amendment 22 context, and the alleged breakdown of trust and confidence.	8h 30m
05/17/2026	Worked through the Cayman hearing transcript from 1 August 2025 before Asif J, concentrating on the overlap between the Cayman writ proceedings and the Delaware complaint of 30 May 2025, the 15 May 2025 email as alleged repudiatory conduct, and the capital-call and budget-approval regime under the limited partnership agreement. Identified key themes including the global default mechanism, the distinction between capital contribution and ownership, the contractual framework for capital calls, default notices and voting-right suspension, and the court's focus on whether the interim relief genuinely held the ring without forcing payment	8h 0m

	under pressure of default consequences. Cross-referenced those themes to the petition and writ pleadings to see how loss of substratum and loss of trust and confidence were being advanced and resisted.	
05/18/2026	Studied in detail the memorandum addressing the loss-of-substratum issue, together with the underlying Cayman and English authorities relevant to impossibility, impracticability, reasonable expectations and rescue or continuation scenarios. Considered how those authorities applied to ATP, particularly the distinction between impossibility and impracticability as tests for loss of substratum, the weight to be given to the purpose clause in the limited partnership agreement, the extent to which the court would look to Rigmora's reasonable expectations, and whether a Chapter 11 rescue plan and new capital could preserve substratum notwithstanding refusal to fund further. Started sketching how these strands might be combined at trial, including the argument that the Partnership's substratum had not been lost if it could continue to invest in biotech through Chapter 11 financing and new investors, and the counter-argument based on expectations at inception and the Braeburn arrangements.	10h 30m
05/19/2026	Continued detailed review of the loss-of-substratum advice and the authorities to which it referred, including materials dealing with post-petition events, timing, reasonable expectations, soft wind-down situations and the possible relevance of rescue proposals. Considered the possibility of arguing that the petition had been premature when filed because substantial contingent subscriptions remained, and the alternative argument that Chapter 11 restructuring could not properly be ignored when assessing whether there was an inevitable loss of funding leading to loss of substratum. Began to outline the structure for a skeleton argument dealing	10h 30m

	with statutory framework, purpose clause, expectations, funding runway, Chapter 11 plan, and the distinction between rescue and ad hoc wind-down.	
05/20/2026	Reviewed additional procedural and logistical matters arising from the Cayman proceedings at a high level while continuing analysis of the petition pleadings and associated materials. Mapped the distinct heads of claim, namely loss of substratum, just and equitable winding up, and the relief sought, including the evolving focus on declarations and appointment of office-holders in place of the general partner. Revisited further authority on reasonable expectations, management conduct and the proper approach to winding-up relief in order to test how those points might be deployed by or against ATP.	10h 0m
05/21/2026	Worked on successive drafts of the Re-Amended Defence, reviewing proposed amendments and considering how best to plead the contractual and fiduciary framework under acute time pressure. Suggested corrections and strategic edits, and prepared for a follow-up conference with Walkers and Seth Harrison to finalise the language around continuation, viability, Chapter 11 and capital-call headroom in light of the Delaware and Chapter 11 backdrop.	9h 30m
05/22/2026	Following the conference with Walkers and Seth Harrison, refined ATP's pleaded case on continuation and viability, advising against overly specific references in the pleading that might prove tactically unhelpful and preferring broader language directed to continuation through existing cash, realisations, financings, disposals, restructurings and remaining committed capital. Confirmed that the amended wording kept the position open while allowing evidential development later. In parallel, considered how best to position the Delaware judgment and whether it could be said that, even absent Chapter 11, it did not itself trigger immediate	9h 30m

	loss of substratum because funds remained and the Partnership could still be wound down in an orderly way under the limited partnership agreement.	
05/23/2026	Reviewed and consolidated internal working materials addressing substratum, Delaware issue estoppel and trial background, drawing together the developing analysis of the Cayman petition, the parallel Delaware findings and the arguments likely to arise at the June hearing. Considered at a high level how the Cayman loss-of-substratum case, the trust and confidence allegations and the Delaware findings could most coherently be presented together, and refined the developing internal narrative for use in further drafting and preparation.	10h 0m
05/24/2026	Returned to the loss-of-substratum authorities in detail, reviewing the Cayman and English cases and related materials on impossibility, impracticability, reasonable expectations, soft wind-downs and the relevance of rescue proposals. Extracted and organised the key points most likely to matter for ATP, including the interaction between the purpose clause, investor expectations, funding position, and the question whether post-petition restructuring or new capital could properly be taken into account.	10h 30m
05/25/2026	Applied the reviewed authorities and working notes back to ATP's factual position, considering in more detail the strengths and weaknesses of the petitioners' loss-of-substratum case and ATP's continuation case. Refined the internal analysis on timing, post-petition events, reasonable expectations, and the possible treatment of Chapter 11 measures and future funding, with a view to feeding those points into the forthcoming skeleton argument and any further pleading or evidential work.	9h 30m

05/26/2026	Reviewed further materials relevant to the Cayman proceedings and considered the newly served summons seeking the appointment of joint provisional liquidators over the Partnership to act in place of the general partner, together with the proposed timetable for responsive evidence and directions. Assessed at a high level how that application interacted with the existing directions for the forthcoming trust and confidence and substratum trial, and with the Chapter 11 stay in Delaware, including the risk that such relief could cut across the restructuring and effectively sideline the general partner.	9h 30m
05/27/2026	Engaged urgently on the summons seeking joint provisional liquidators, including the implications of the United States lawyers' view that the application represented a breach of the Chapter 11 stay and the need to resist the application in Cayman while coordinating with the Delaware position. Held an urgent conference with Walkers to map out the evidence needed to oppose the summons, plan the Cayman response on directions, and coordinate with United States counsel on the stay position. Also dealt at a high level with related procedural and practical matters arising from the cross-border posture of the case.	10h 30m
05/28/2026	Reviewed in detail the petitioners' Re-Amended Reply together with the Re-Amended Defence, considering in particular the sharpened battleground over whether Chapter 11 and new funding could preserve the substratum and how the joint provisional liquidator summons interacted with the relief now sought. Checked specific pleading points and began sketching the structure for the responsive skeleton argument, including substratum and appropriate relief, trust and confidence, contractual funding and default issues under the limited partnership agreement, and Delaware, issue-estoppel and abuse-of-process points. Also considered at a high level certain practical matters arising from the ongoing conduct of the proceedings	10h 30m
05/29/2026	Continued reading-in across the expanded Cayman and Delaware materials in the electronic bundles, including the December 2025 witness statements, directions orders, skeletons and transcripts, and forwarded the Re-Amended Reply and the JPL	3h 20m

	summons materials internally to Akash Sonecha and Anson Cheung (3 hrs 20 mins)	
05/29/2026	Began mapping which evidence would matter most for the loss-of-substratum hearing and for any subsequent trust and confidence trial, and worked through the interplay between the Delaware judgment and the Cayman petition (2 hrs 51 mins)	2h 51m
05/29/2026	Held a strategy meeting with Akash and Anson to set the overall direction for the Cayman substratum and trust and confidence proceedings, covering issue-estoppel risks and opportunities, the relationship between Chapter 11 restructuring and the Rigmora provisional-liquidator application, and the tight timetable for evidence, cross-examination and bundles; agreed tasks for Akash and Anson (Delaware reading-in, issue list, evidence-needs schedule and a working draft skeleton and speaking note), and coordinated with Walkers on introductions and division of work (3 hrs 20 mins)	3h 20m
05/30/2026	Continued detailed review of the substratum authorities and comparative materials, including Cayman, BVI, English, Hong Kong and Singapore cases and commentary, with a view to refining the legal test and identifying the most helpful authorities on impossibility, impracticability, reasonable expectations and locked-up capital (3 hrs 24 mins)	3h 24m
05/30/2026	Read and considered the Hong Kong and Singapore materials gathered over the weekend and began to integrate those themes into the developing Cayman argument, particularly as to whether the court should focus on the purpose clause, investor expectations or broader fairness considerations (2 hrs 33 mins)	2h 33m
05/30/2026	Updated the working outline for the substratum skeleton and related internal notes to reflect the comparative authorities and their possible use at trial (2 hrs 33 mins)	2h 33m
05/31/2026	Applied the comparative case-law analysis back to ATP’s facts, considering how the Hong Kong and Singapore authorities might support ATP’s position on identifying the Partnership’s main purpose, the proper role of reasonable expectations, and the	3h 24m

	significance of keeping limited partners locked into the vehicle where a rescue route remains available (3 hrs 24 mins)	
05/31/2026	Reviewed further materials concerning the proposed deal structure and how that might be characterised by the petitioners as abandonment, and considered how to answer that point without undermining ATP's continuation case (2 hrs 33 mins)	2h 33m
05/31/2026	Continued developing the internal argument on the proper legal test, appealable points of principle and the extent to which post-petition rescue proposals can and should be taken into account (2 hrs 33 mins)	2h 33m
06/01/2026	Returned to the pleadings, witness materials and limited partnership agreement in light of the developing comparative-law and substratum analysis; also reviewed and approved the redlined draft of my Cayman admission affidavit forwarded by Laure-Astrid Wigglesworth (4 hrs 22 mins)	4h 22m
06/01/2026	Reviewed again the re-amended petition, re-amended defence and re-amended reply, focusing on the pleaded position as to funding runway, management and operating expenses, Braeburn and other portfolio companies, and the significance of the contractual end date (4 hrs 22 mins)	4h 22m
06/01/2026	Considered how the evidential case should answer the petitioners' allegation of inevitable failure and what documentary and witness material would be needed to support ATP's position that the Partnership could lawfully and practically continue through Chapter 11, asset realisations and further funding (3 hrs 45 mins)	3h 45m
06/02/2026	Reviewed the draft Fifth Affirmation of Yuri Bogdanov and the evolving list of evidence for the substratum hearing, checking whether the proposed exhibits would sufficiently address the Partnership's funding runway, Chapter 11 restructuring, Braeburn's position and relevant Delaware rulings (3 hrs 18 mins)	3h 18m

06/02/2026	Took part in a strategy meeting with Akash and Anson focused on evidence planning, including how best to demonstrate that the Partnership could lawfully and practically continue notwithstanding funding headwinds, the extent to which consent requirements could be worked around in Chapter 11, and whether any inconsistency between the petitioners' Cayman substratum case and their position in the bankruptcy proceedings should be deployed (3 hrs 18 mins)	3h 18m
06/02/2026	Settled the framework for an evidence-needs list for Walkers, including limited partnership agreement powers, funding options, asset realisations and causation of difficulties; approved dispatch of the counsel-team list of evidence and questions to Walkers; and agreed that Walkers should assemble a dedicated trust and confidence folder.(4 hrs 24 mins)	4h 24m
06/03/2026	Analysed in more detail the Delaware materials assembled by Quinn Emanuel and Walkers' table of relevant Delaware evidence, focusing on how the Delaware court had approached funding, capital calls and the relationship between Chapter 11 and the Cayman proceedings; considered Walkers' consolidated list of documents referenced across the Grand Court witness statements (4 hrs 24 mins)	4h 24m
06/03/2026	Considered how far ATP could rely on the Delaware findings consistently with issue-estoppel principles and comity, and which points were likely to be contested by Rigmora (3 hrs 18 mins)	3h 18m
06/03/2026	Fed those points into the developing outline for ATP's substratum evidence and thinking on cross-examination and witness preparation (3 hrs 18 mins)	3h 18m
06/04/2026	Reviewed Walkers' draft letter on trial logistics and the emerging plan for witnesses, cross-examination and court time, to ensure alignment with the developing legal and evidential strategy on substratum and related issues (3 hrs 9 mins)	3h 09m
06/04/2026	Read and considered further United States materials and declarations, including material from Perry Mandarino and Seth Harrison, with a view to how their evidence could be deployed in Cayman without cutting across the United States court's supervision of the restructuring; digested the loss-of-substratum evidence just received from the	3h 09m

	Rigmora LPs and the accompanying exhibit link (3 hrs 9 mins)	
06/04/2026	Continued refining the list of evidential topics and legal issues to be addressed in ATP's response evidence and at the hearing; dealt at a high level with the parallel BVI injunctive relief matter which had come back live via the clerks (4 hrs 12 mins)	4h 12m
06/05/2026	Reviewed the sealed version of the Fifth Bogdanov affirmation together with Walkers' latest note on substratum arguments and evidence, and updated the internal analysis of the factual battleground, including funding runway, Braeburn and other portfolio companies, Chapter 11, and investor expectations (3 hrs 18 mins)	3h 18m
06/05/2026	Joined a meeting with Akash and Anson to refine strategy for the substratum hearing in light of the Delaware findings and the demanding evidence timetable, discussing the correct Cayman test for loss of substratum, how best to characterise the Delaware judgment and Chapter 11 in submissions, the relationship with any provisional-liquidator appointments, and how to keep trust and confidence issues largely in reserve (3 hrs 18 mins)	3h 18m
06/05/2026	Agreed next steps for Akash and Anson to progress the skeleton argument, speaking note and evidence planning while liaising with Walkers on timing and coordination, and continued related drafting and preparation (4 hrs 24 mins)	4h 24m
06/06/2026	Reviewed and commented on the draft ATP affidavits, including the draft affidavits of Perry Mandarino and Seth Harrison for the loss-of-substratum trial, checking for consistency with the pleaded case, the Delaware materials and the developing legal analysis.(3 hrs 24 mins)	3h 24m
06/06/2026	Suggested refinements to the narrative on the Partnership's purpose, funding history, current position and future plan, including clarification of how Chapter 11 and new investors could preserve substratum and why the appointment of provisional liquidators would be inconsistent with both Cayman principles and the United States restructuring (2 hrs 33 mins)	2h 33m

06/06/2026	Ensured that the evidence preserved flexibility for appealable points on the proper legal test and the treatment of rescue plans (2 hrs 33 mins)	2h 33m
06/07/2026	Undertook a detailed consolidation of all ATP work done, working through the chronology of instructions, pleadings, authorities, meetings, drafts and evidence (4 hrs 30 mins)	4h 30m
06/07/2026	Reviewed the further round of draft affidavits (including Walkers' revised drafts of the Harrison and Mandarino evidence), the Rigmora loss-of-substratum evidence and the accompanying exhibits, to identify points that needed to be picked up in comments to the solicitor and counsel team (1 hr 30 mins)	1h 30m
06/07/2026	Dictated and sent detailed comments to Walkers and the counsel team on the evolving evidence and skeleton position, including on the treatment of Chapter 11, funding runway and the JPL summons response (54 mins)	0h 54m
06/07/2026	Joined a Zoom strategy call with Walkers to talk through the affidavit and skeleton position, next-week tasks and the interaction with the Delaware proceedings; assets for that meeting were subsequently released to me by the meeting platform (36 mins)	0h 36m
06/08/2026	Reviewed in detail Walkers' redline of Dr Seth Harrison's affidavit received early morning from Rebecca Moseley, including the Sally Jacob witness statement query and the interaction with Perry Mandarino's evidence and the QE-cleared US materials (3 hrs 45 mins)	3h 45m
06/08/2026	Responded to Walkers (14:02) with substantive drafting comments on the Harrison affidavit, focussing on treatment of Chapter 11 funding, Braeburn and the continuation case, and consistency with the pleaded position and the Fifth Bogdanov affirmation (2 hrs 30 mins)	2h 30m
06/08/2026	Considered Walkers' indemnity memorandum circulated by Becky Moseley dealing with the Chapter 11 stay position, the JPL summons and the impact on the substratum trial timetable, and prepared for the 5pm Cayman-time call on Tuesday 9 June (1 hrs 52 mins)	1h 52m
06/08/2026	Continued detailed reading of the Rigmora loss-of-substratum evidence and Fifth Bogdanov affirmation exhibits, cross-checking against the	2h 30m

	counsel-team evidence-needs schedule (2 hrs 30 mins)	
06/08/2026	Progressed the substratum skeleton structure on the strength of the developing evidence and Delaware analysis, and coordinated tasks with Akash and Anson (1 hr 52 mins)	1h 52m
06/09/2026	Attended the 5pm Cayman-time (10pm UK) call with Walkers on the indemnity memo, the Chapter 11 stay and the interaction with the JPL summons and the substratum trial; discussed responsive evidence strategy and the position on cross-examination (3 hrs)	3h 0m
06/09/2026	Reviewed and commented on the further round of Walkers' drafts of the Harrison and Mandarino affidavits, including QE-cleared amendments, and settled the counsel team's consolidated comments (3 hrs)	3h 0m
06/09/2026	Worked through the Delaware Chapter 11 timeline and the interaction with the Cayman substratum trial, in particular the impact of Judge Silverstein's clarification and the sanctions position advanced by ATP (2 hrs 24 mins)	2h 24m
06/09/2026	Continued drafting the substratum skeleton framework and directing Akash and Anson on the loss-of-substratum, trust and confidence and issue-estoppel sections (2 hrs 24 mins)	2h 24m
06/09/2026	Corresponded with Walkers on the JPL summons hearing arrangements and the proposed joint communication to Justice Asif (1 hr 12 mins)	1h 12m
06/10/2026	Reviewed and commented on the multiple iterations of the Mandarino affidavit circulated through the day. advising on structure, treatment of the Chapter 11 funding motions (paragraph 26), the appointment of a Chapter 7 trustee (paragraph 20(c)) and the extent to which references to Rigmora's conduct should remain in the evidence (3 hrs 54 mins)	3h 54m
06/10/2026	Coordinated the QE input from Eric Winston and Alain Jaquet with the Walkers drafts and provided the counsel team's consolidated position (2 hrs 36 mins)	2h 36m
06/10/2026	Reviewed the developing draft of the Harrison affidavit alongside the Mandarino evidence and considered coherence between the two on funding runway, the Delaware findings and the Partnership's continuation case (1 hr 57 mins)	1h 57m

06/10/2026	Continued detailed work on the substratum skeleton and reviewed further US filings and correspondence in relation to the Sanctions Motion and the Clarification Motion in Delaware (1 hr 57 mins)	1h 57m
06/10/2026	Confirmed travel/attendance arrangements for the 30 June/1 July hearing with Izabella Arnold and coordinated with clerks on Cayman logistics (1 hr 18 mins)	1h 18m
06/10/2026	Progressed the JPL summons research work-stream (following the Walkers/Chris research memo forwarded 19:47 the following evening) and planned the response on directions and cross-examinations (1 hr 18 mins)	1h 18m
06/11/2026	Sworn my Cayman admission affidavit remotely with the Court clerk in the morning (Cayman time) in accordance with the arrangements confirmed by Laure-Astrid Wigglesworth, and dealt with the follow-up scanning and dispatch to Walkers (3 hrs 54 mins)	3h 54m
06/11/2026	Reviewed the loss-of-substratum evidence in preparation for the 1pm Cayman-time deadline on agreement on cross-examination of witnesses; concluded, on Akash Sonecha's further analysis, that we should not seek cross-examination, and advised Walkers accordingly (2 hrs 36 mins)	2h 36m
06/11/2026	Reviewed Chris's JPL summons research memorandum on the argument that Justice Asif cannot (or at least should not) exercise the section 104(2) and section 95(3)(a) powers so as to install office-holders during the substratum trial, and considered how this fits with the response to the JPL summons (2 hrs 36 mins)	2h 36m
06/11/2026	Continued drafting and directing the substratum skeleton work, and reviewed the position on the joint communication to the Court with Campbells (1 hr 57 mins)	1h 57m
06/11/2026	Dealt with logistics and correspondence on Cayman admission, hearing bundles and JPL summons research (1 hr 57 mins)	1h 57m
06/12/2026	Reviewed the draft joint communication to the Court from Campbells (forwarded by Becky Moseley 19:54) and Walkers' initial comments; advised on the substance of the joint statement, including whether to include the Respondent's reservation of rights on Justice Asif's power to	3h 45m

	appoint JPLs after the substratum hearing (3 hrs 45 mins)	
06/12/2026	Continued detailed work on the substratum skeleton and further review of the loss-of-substratum authorities and comparative materials, and considered how to structure the presentation of the Delaware findings (2 hrs 30 mins)	2h 30m
06/12/2026	Attended to correspondence with Shelley White on the JPL summons research, including the transmission of the counsel team's points to the US team ahead of the 24 June hearing (1 hr 52 mins)	1h 52m
06/12/2026	Reviewed the position on trial bundles and the interaction with the Opus 2 arrangements in the light of the developing correspondence with Campbells (2 hrs 30 mins)	2h 30m
06/12/2026	Coordinated with Akash and Anson on skeleton drafting, speaking note structure and Delaware issue-estoppel points (1 hr 52 mins)	1h 52m
06/13/2026	Deep reading of the substratum authorities and comparative materials (Cayman, English, BVI, Hong Kong and Singapore) in preparation for the skeleton drafting, focussing on the argument that a Chapter 11 rescue plan and new capital can preserve substratum (3 hrs 24 mins)	3h 24m
06/13/2026	Advanced my own draft of the substratum skeleton framework and worked through the treatment of the purpose clause, reasonable expectations, funding runway, the Braeburn arrangements and the Delaware findings (2 hrs 58 mins)	2h 58m
06/13/2026	Reviewed and commented on Akash's draft chronology, dramatis personae and skeleton sections in progress; sent directions on scope and cross-referencing (2 hrs 8 mins)	2h 08m
06/14/2026	Continued detailed work on the substratum skeleton, in particular the sections on impossibility/impracticability, purpose clause, reasonable expectations and the Delaware backdrop (3 hrs 12 mins)	3h 12m
06/14/2026	Reviewed the Delaware materials (Judge Silverstein's clarifications, the Sanctions Motion, the Clarification Motion and the funding motions) and their interaction with the Cayman substratum case (2 hrs 24 mins)	2h 24m

06/14/2026	Prepared for the coming week's tasks including the Apple Tree retention application, the substratum skeleton first-circulation deadline and the JPL summons response, and gave directions to Akash and Anson on next steps (2 hrs 24 mins)	2h 24m
06/15/2026	Worked on the substantive draft of the substratum skeleton, focussing on the loss-of-substratum test, the treatment of Chapter 11, the Braeburn position and the funding runway argument (3 hrs 45 mins)	3h 45m
06/15/2026	Reviewed further Cayman and English authorities on winding up and rescue and their application to ATP; refined the framework for reasonable-expectations argument (3 hrs 8 mins)	3h 08m
06/15/2026	Directed Akash and Anson on skeleton sections and reviewed successive drafts of the introduction and the substratum authorities section (2 hrs 30 mins)	2h 30m
06/15/2026	Corresponded with Walkers on skeleton timing, evidence status and the trial bundle position; reviewed the emerging position on the Opus 2 arrangements (1 hr 52 mins)	1h 52m
06/15/2026	Reviewed further US-side developments including Delaware filings and the interaction with the Cayman timetable (1 hr 15 mins)	1h 15m
06/16/2026	Continued work on the substantive draft of the substratum skeleton, including the sections on the purpose clause and the interaction with the Chapter 11 rescue plan (3 hrs 15 mins)	3h 15m
06/16/2026	Reviewed the Campbells mark-up of the proposed joint communication to Justice Asif (received via Walkers) and considered points to be pressed and points to be conceded, including on the Opus 2 correspondence and the position on the JPLs summons (2 hrs 36 mins)	2h 36m
06/16/2026	Reviewed Walkers' response to Campbells on the trial bundle index and provided drafting directions on the position to be taken with Campbells and, if necessary, with the Court (2 hrs 36 mins)	2h 36m
06/16/2026	Reviewed the updated position on cross-examination (Campbells having now agreed there would be no cross-examination at the loss-of-substratum trial, as confirmed by Rebecca Moseley on 16 June 21:13) and revised the trial-preparation plan accordingly (1 hrs 57 mins)	1h 57m
06/16/2026	Continued preparation for the Apple Tree retention application in Delaware, including reading through	1h 18m

	the draft retention application circulated by Halley Dannemiller of Potter Anderson (1 hr 18 mins)	
06/16/2026	Directed Akash and Anson on the JPL/substratum speaking note and the response to Campbells on trial logistics (1 hr 18 mins)	1h 18m
06/17/2026	Reviewed and drafted comments on the Apple Tree retention application received the previous evening from Halley Dannemiller (Potter Anderson), and sent substantive comments at 06:17 (confirmed as received by Potter Anderson at 05:23 US time on 17 June) covering the scope of Cayman work, the s.24(5)(j) position and the interaction with limited admission (2 hrs 42 mins)	2h 42m
06/17/2026	Considered Akash Sonecha's follow-up (09:47) on the possibility of continuing to work on the case after 30 June under s.24(5)(j) of the 2020 Act, and coordinated with the clerks on the Cayman admission position (2 hrs 2 mins)	2h 02m
06/17/2026	Continued detailed work on the substantive draft of the substratum skeleton and directed Akash and Anson on completion for first circulation, in response to Becky Moseley's 19:42 chase (4 hrs 3 mins)	4h 03m
06/17/2026	Reviewed the further Campbells mark-up of the joint communication to the Court (Becky Moseley 02:49) and advised on final position, including whether to concede the deletion of the paragraph on Justice Asif's power to appoint JPLs after the substratum hearing (2 hrs 2 mins)	2h 02m
06/17/2026	Reviewed the developing trial-bundle correspondence with Campbells and the position on the Opus 2 arrangements (1 hr 21 mins)	1h 21m
06/17/2026	Reviewed the US Chapter 11 developments and Delaware filings and prepared for the imminent circulation of the substratum skeleton to Walkers (1 hr 21 mins)	1h 21m
06/18/2026	Finalised the counsel-team draft of the substratum skeleton for first circulation, working through the treatment of the loss-of-substratum test, the interaction with the Chapter 11 rescue plan, the Braeburn and funding runway analysis and the Delaware backdrop; instructed Akash to circulate to Walkers by COB (4 hrs 54 mins)	4h 54m

06/18/2026	Reviewed the trial logistics correspondence between Walkers and Campbells and directed Walkers on the position to be taken on the trial bundle index (Laure-Astrid Wigglesworth 22:00 update on putting the onus back on Campbells to provide a revised index) (2 hrs 48 mins)	2h 48m
06/18/2026	Continued review of the Delaware materials and correspondence, including the position on the JPL summons and the Sanctions Motion, and the interaction with the joint communication to the Court (2 hrs 6 mins)	2h 06m
06/18/2026	Directed Akash and Anson on the JPL/substratum speaking note and reviewed drafts of the chronology and dramatis personae in progress (2 hrs 6 mins)	2h 06m
06/18/2026	Corresponded with Walkers on hearing logistics, admission requirements and travel arrangements for the 30 June/1 July hearing (2 hrs 6 mins)	2h 06m
06/19/2026	Circulated the counsel-team's Loss of Substratum Skeleton to Walkers in the morning through Akash Sonecha's 11:10 email ("we now have an advanced draft of the skeleton on the stocks"); managed subsequent comments and the review process with Shelley White, Becky Moseley and Laure-Astrid Wigglesworth (Shelley's 11:48 acknowledgement) (3 hrs 30 mins)	3h 30m
06/19/2026	Considered and directed the response to Campbells' position on the trial bundle index, including through the counsel-team amendments to the draft Index (Akash Sonecha 10:44 with suggested amendments) and Shelley White's 11:14 and 11:53 emails on strategy (whether to revert by Campbells' 10am deadline or write to the judge) (2 hrs 48 mins)	2h 48m
06/19/2026	Advised on the substratum skeleton direction being sought from Asif J on Campbells' conduct on bundles and considered the position (Akash Sonecha 10:06/10:19 and Shelley White 10:19) on the joint email versus a direct approach to the judge (2 hrs 6 mins)	2h 06m
06/19/2026	Reviewed the further trial logistics correspondence and the Opus 2 arrangements (Laure-Astrid Wigglesworth 02:35 and Shelley White 02:54) (2 hrs 6 mins)	2h 06m
06/19/2026	Continued detailed preparation for the substantive substratum hearing, including further work on the speaking note and the underlying authorities on	2h 06m

	impossibility, impracticability and reasonable expectations (2 hrs 6 mins)	
06/19/2026	Dealt with US-side matters, including the Apple Tree retention application and its interaction with the s.24(5)(j) position (1 hr 24 mins)	1h 24m
06/20/2026	Reviewed Campbells' response on the bundle index (Becky Moseley 19:35 – "incredibly unhelpful", reinstating almost everything) and directed Akash and Anson on the counsel team's response, approving Akash's suggested draft email at 20:35 and confirmed by Anson at 20:54 (4 hrs 48 mins)	4h 48m
06/20/2026	Continued detailed work on the substratum skeleton and speaking note, incorporating Walkers' initial reactions and identifying remaining points to be worked through with Shelley, Becky and Laure-Astrid (3 hrs 36 mins)	3h 36m
06/20/2026	Reviewed the underlying loss-of-substratum authorities in light of the Rigmora evidence and the Delaware findings; refined the argument on the Chapter 11 rescue plan (2 hrs 24 mins)	2h 24m
06/20/2026	Corresponded with Walkers on trial logistics, the US attorney position and the interaction with the 30 June/1 July hearing (1 hr 12 mins)	1h 12m
06/21/2026	Deep work on the substratum skeleton and speaking note ahead of the hearing week, focussing on the treatment of the Delaware findings, the Chapter 11 restructuring and the funding runway argument (4 hrs 33 mins)	4h 33m
06/21/2026	Reviewed further authorities on issue estoppel and abuse of process in the Chapter 11/Cayman context and their treatment in the skeleton and speaking note (3 hrs 15 mins)	3h 15m
06/21/2026	Reviewed and directed drafts of the chronology and dramatis personae for the trial bundle (2 hrs 36 mins)	2h 36m
06/21/2026	Prepared for the hearing week's tasks and coordinated with Akash, Anson and Walkers on the remaining drafting and evidence work (2 hrs 36 mins)	2h 36m
06/22/2026	Reviewed and considered Walkers' comments and tracked changes on the substratum Skeleton and settled the counsel team's response to Walkers' substantive amendments (4 hrs 30 mins)	4h 30m

06/22/2026	Reviewed further Walkers correspondence on the position of a US attorney at the loss-of-substratum trial (Shelley White 10:37) and the timezone/venue considerations, and coordinated the counsel team's response (3 hrs)	3h 0m
06/22/2026	Continued substantive redrafting of the substratum skeleton, working through the Delaware materials and the Chapter 11 rescue plan analysis (3 hrs)	3h 0m
06/22/2026	Directed Akash and Anson on the speaking note and the chronology/dramatis personae drafts, and reviewed successive iterations (2 hrs 15 mins)	2h 15m
06/22/2026	Reviewed the underlying loss-of-substratum authorities and the Rigmora evidence in detail, cross-checking against the pleaded case and the Delaware findings (2 hrs 15 mins)	2h 15m
06/23/2026	Reviewed the counsel team's amendments to the chronology and dramatis personae (Akash Sonecha 14:22 and 15:07 sending back to Walkers with comments) and directed Akash on the remaining points; considered Rebecca Moseley's 16:58 reply attaching the 11 May 2025 budget-allocation email and its treatment in the chronology (3 hrs 45 mins)	3h 45m
06/23/2026	Reviewed Walkers' further comments on the substratum skeleton (Shelley White 10:12 point about the Rigmora bid proposal being provided on a WP basis and Eric's hope for a public release) and refined the skeleton and speaking note accordingly (3 hrs)	3h 0m
06/23/2026	Continued detailed drafting and editing of the substratum skeleton, focussing on the loss-of-substratum test, the Chapter 11 rescue plan, the Braeburn position and the funding runway analysis (3 hrs 45 mins)	3h 45m
06/23/2026	Directed Akash and Anson on the speaking note and reviewed further drafts of the chronology and dramatis personae (2 hrs 15 mins)	2h 15m
06/23/2026	Reviewed further Delaware developments and correspondence, and prepared for the 24 June hearing (2 hrs 15 mins)	2h 15m
06/24/2026	Attended to the 24 June Cayman hearing preparation and follow-up, including review of the trust and confidence points and the interaction with the substratum case (3 hrs 6 mins)	3h 06m
06/24/2026	Reviewed further comments on the substratum skeleton from Walkers (Rebecca Moseley 19:24 circulating the wider-group comments after	3h 06m

	finishing with the Delaware materials) and settled the counsel team's consolidated position (3 hrs 6 mins)	
06/24/2026	Reviewed the position on the Apple Tree retention application in the Delaware bankruptcy court (Shelley White 20:07 confirming addition to the invitation, and the docket update) and its interaction with the Cayman timetable (2 hrs 20 mins)	2h 20m
06/24/2026	Reviewed Rebecca Moseley's 23:57 email on the chronology with Campbells' amendments and gave directions on which to accept and which to press back on (2 hrs 20 mins)	2h 20m
06/24/2026	Continued substantive drafting on the substratum skeleton and speaking note and directed the counsel team on the remaining work (2 hrs 20 mins)	2h 20m
06/24/2026	Coordinated the US-attorney breakfast arrangement (Shelley White 23:46 confirming 7:30am at Seven) and the wider hearing-week logistics (2 hrs 20 mins)	2h 20m
06/25/2026	Reviewed and directed the counsel team on Rebecca Moseley's 21:41 email on Campbells' "screed" over the Rigmora bid document being non-privileged and the interaction with Opus 2 upload; advised on the position to be taken (that we would not refer to the bid at trial if Shelley and Jan were content). (4 hrs 39 mins)	4h 39m
06/25/2026	Reviewed Walkers' further work on the corrective affidavit position (Shelley White 19:07 on the transfer having occurred at the time the earlier affidavit was sworn) and directed the counsel team (3 hrs 6 mins)	3h 06m
06/25/2026	Continued substantive editing of the substratum skeleton and finalising the speaking note (3 hrs 6 mins)	3h 06m
06/25/2026	Reviewed further trial-bundle and correspondence issues with Campbells and coordinated the position on the trial preparation (3 hrs 6 mins)	3h 06m
06/25/2026	Prepared for departure to Cayman and coordinated final admission and logistical points with Walkers and clerks (3 hrs 6 mins)	3h 06m
06/26/2026	Reviewed Rebecca Moseley's 02:10 response on the Rigmora bid position with the alternative options to be sent back to Hugo Farmer of Campbells and settled the counsel team's reply (3 hrs 6 mins)	3h 06m

06/26/2026	Reviewed Walkers' forwarded proposed timetable for submissions (Laure-Astrid Wigglesworth 17:15 and 17:16 "Trial next week" correspondence with Campbells) and settled the counsel team's response (3 hrs 6 mins)	3h 06m
06/26/2026	Reviewed Rebecca Moseley's 21:28 note on issue estoppel research together with the summary of the Cayman position, and used it to refine the treatment of issue estoppel in the substratum skeleton and JPL speaking note (3 hrs 6 mins)	3h 06m
06/26/2026	Reviewed Izabella Arnold's 22:43 email on the L2/1, L2/4, L3/30 and L2/2 replacements from Campbells due to highlighting and other issues and considered the impact on the trial bundle (2 hrs 20 mins)	2h 20m
06/26/2026	Attended final logistics and admission points and pre-hearing coordination with Walkers, Akash and Anson (2 hrs 20 mins)	2h 20m
06/26/2026	Continued substantive work on the speaking note and finalised the counsel team's position on all remaining points (1 hr 33 mins)	1h 33m
06/27/2026	Full-day preparation for the substratum trial, working through the final substratum skeleton, the JPL speaking note, the chronology and dramatis personae and the trial bundle (6 hrs)	6h 0m
06/27/2026	Detailed re-reading of the loss-of-substratum authorities, the Delaware findings and the Rigmora evidence to prepare for the oral submissions on Day 1 (30 June) (4 hrs 30 mins)	4h 30m
06/27/2026	Considered anticipated arguments and cross-arguments from Campbells and prepared responsive points, and coordinated with Akash and Anson (3 hrs)	3h 0m
06/27/2026	Travel and logistics to Cayman for the hearing week; final coordination with Walkers (1 hr 30 mins)	1h 30m
06/28/2026	Continued full-day preparation for the substratum trial in Cayman, working through the final draft of the speaking note, the substratum skeleton and the trial bundle materials (5 hrs 36 mins)	5h 36m
06/28/2026	Deep reading of the loss-of-substratum authorities and Delaware materials, focussing on issue estoppel and the Chapter 11 rescue plan analysis; refined arguments on the reasonable-expectations and purpose-clause points (4 hrs 12 mins)	4h 12m

06/28/2026	Coordinated with Walkers, Akash and Anson on final hearing logistics, the JPL summons position and the interaction with the substratum trial timetable (2 hrs 48 mins)	2h 48m
06/28/2026	Reviewed the trial bundle and Opus 2 arrangements ahead of the hearing (1 hr 24 mins)	1h 24m
06/29/2026	Reviewed Anson Cheung's and Akash Sonecha's drafts of the JPL/Bundle Speaking Note and the issue estoppel note; approved the "short short" answer structure for paragraph 2 and directed removal of numbering in the attached speaking note (Akash Sonecha 17:36). (3 hrs 45 mins)	3h 45m
06/29/2026	Reviewed Akash's further note on issue estoppel (18:06) reflecting Becky's comments and directed the final position on paragraphs 33 and 87 (3 hrs 45 mins)	3h 45m
06/29/2026	Reviewed Jan Golaszewski's 19:58 initial questions on the trust and confidence points at paragraph 14 of the note and coordinated the counsel team's response (3 hrs)	3h 0m
06/29/2026	Attended final pre-hearing coordination with Walkers, including Laure-Astrid Wigglesworth's 21:33 email confirming the 9am car and hearing arrangements (2 hrs 15 mins)	2h 15m
06/29/2026	Coordinated the team lunch and social/travel arrangements with Jan Golaszewski and the wider team for after the hearing (20:46, 20:52, 21:27 and 21:33 exchanges). (2 hrs 15 mins)	2h 15m
06/30/2026	Early-morning preparation from 05:00 UK time onwards, including review of Laure-Astrid Wigglesworth's 02:34 email clarifying the position on the trust and confidence points raised the previous night, Rebecca Moseley's 03:58 further comments on the speaking note and Akash Sonecha's 11:25 further turn of the note (2 hrs 20 mins)	2h 20m
06/30/2026	Reviewed Akash Sonecha's 11:48 correction on the Third Funding Motion cash-on-hand figure, and his 12:58 short summary of the new documents circulated (2 hrs 20 mins)	2h 20m
06/30/2026	Reviewed Anson Cheung's 13:32 and 13:41 JPL note and highlighted points; and Rebecca Moseley's 13:49 email on the composition of the $66m figure and Chapter 11 expenses (2 hrs 20 mins)	2h 20m

06/30/2026	Appeared before Justice Asif KC on Day 1 of the loss-of-substratum trial in FSD 151 of 2025 (JAJ) from approximately 10:00 to 16:30 Cayman time, opening the case on loss of substratum, dealing with the Delaware materials and the Chapter 11 rescue plan analysis, and responding on the JPL summons and issue-estoppel points; documents on screen were coordinated through Izabella Arnold with Cara at Opus 2 (14:56/14:57 exchange).(4 hrs 39 mins)	4h 39m
06/30/2026	Post-hearing conference with Walkers and the counsel team, including review of Jan Golaszewski's 16:11 and 16:26 emails on the FN 55 quote and the QE/Potter Anderson coordination, and Izabella Arnold's 16:55 and 20:12 emails on the paragraph 52 quote and the client/US counsel reactions to whether the criticism was directed to Rigmora rather than the Judge (2 hrs 20 mins)	2h 20m
06/30/2026	Reviewed Izabella Arnold's 21:14 further comments from QE (Patty Tomasco) over the course of the Petitioners' submissions and Rebecca Moseley's 22:33 note on the new hearing entry on the Court portal (FSD2025-0151, due date 3 July 2026), and Anson Cheung's 23:41 and 23:49 JPL note and Cayman ELP legal-personality point (1 hr 33 mins)	1h 33m
07/01/2026	Early-morning preparation from 05:00 UK time onwards, including Rebecca Moseley's 00:30 note on when "officeholders" was first raised and Akash Sonecha's 00:46 updated speaking note with responsive points reflecting Asif J's indicated interests, and 00:52 and 00:58 exchanges on s.24(5)(j) and the point-by-point format (2 hrs 20 mins)	2h 20m
07/01/2026	Reviewed Izabella Arnold's 01:58 email on the Realtime page availability and Opus 2 recipient list, Rebecca Moseley's 02:10 further points on figures in the speaking note, Izabella Arnold's 02:47 email on the Trial Bundle Upload correspondence at Bundle I and Laure-Astrid Wigglesworth's 03:59 email on the ELP Act s.35 point and the substitution of LPs argument (2 hrs 20 mins)	2h 20m
07/01/2026	Reviewed the Day 1 transcript circulated by Laure-Astrid Wigglesworth at 04:02 and used it to refine the Day 2 arguments and the responses to the Petitioners' submissions (2 hrs 20 mins)	2h 20m

07/01/2026	Reviewed Rebecca Moseley's 05:08 further comments on the responsive speaking note, Akash Sonecha's 10:22 revised draft focussed on cutting unnecessary points, and Anson Cheung's 11:13, 12:18 and 12:20 tracked-changes iterations and Opus upload requests (2 hrs 20 mins)	2h 20m
07/01/2026	Appeared before Justice Asif KC on Day 2 of the loss-of-substratum trial from approximately 10:00 to 16:30 Cayman time, responding to the Petitioners' submissions, dealing with the JPL summons and the ELP legal-personality point, and taking the Court through the further Delaware materials and the QE/Potter Anderson responses on timing and bad faith (LA Wigglesworth 18:22 and Becky Moseley 18:29 summarising QE input, Motion to Dismiss and Motion for Relief from Stay materials). (3 hrs 52 mins)	3h 52m
07/01/2026	Post-hearing conference with Walkers, Jan Golaszewski, and the counsel team; Rebecca Moseley's 12:32 and 12:40 responses on the ELP provisions and Opus uploads; coordinated final position and next-day debrief (2 hrs 30 mins)	2h 20m
07/03/2026	Reviewed and consolidated the Day 1 and Day 2 hearing transcripts (finalised Day 2 having come in from Opus 2 the previous night) and the counsel-team notes of Justice Asif KC's indications on the substratum, JPL and officeholder points, to identify next steps and any further evidence, submissions or applications that might be needed post-hearing. (2 hrs 45 mins)	2h 45m
07/03/2026	Considered with Akash and Anson the scope of the further evidence required for the trust and confidence trial, in particular whether ATP had a further round of evidence to serve and the interaction with the timetable set by paragraph 15 of the directions order (1 hr 45 mins)	1h 45m
07/03/2026	Convened a counsel-team call with Akash and Anson to work through the position on TC-trial evidence, the sequencing of the December 2025 evidence and reply evidence, and next steps to be taken with Walkers (1 hr 45 mins)	1h 45m
07/03/2026	Reviewed and settled the counsel-team position on the ATP Life Science Ventures Day 2 (01/07/2026) follow-up correspondence with Walkers, and joined the resulting post-hearing debrief call with Walkers(1 hr 15 mins)	1h 15m

07/03/2026	Corresponded with Walkers on the new Court portal hearing entry (FSD2025-0151 due date 3 July 2026), Rebecca Moseley's outstanding queries from the hearing and the interaction with the Delaware Chapter 11 timetable (1 hr 15 mins)	1h 15m
07/04/2026	General preparation for the trust and confidence trial, focussing on the pleaded issues, the evidence served to date and the further evidence to be marshalled by ATP; considered the areas in which Reply evidence would be required and how those areas mapped onto the Cayman substratum ruling awaited from Justice Asif KC. (3 hr 45 mins)	3h 45m
07/04/2026	Reviewed the witness statements served in December 2025 with a view to identifying gaps and points requiring further explanation, and considered the topics on which cross-examination would be most productive (2 hrs 15 mins)	2h 15m
07/04/2026	Reviewed the Delaware Chapter 11 materials most closely bearing on the TC issues and considered the interaction between the Delaware and Cayman timetables (1 hr 30 mins)	1h 30m
07/05/2026	Continued preparation for the trust and confidence trial, working through the outline of ATP's case on the trust and confidence issues and refining the working list of themes and factual points to be developed at trial (3 hrs 30 mins)	3h 30m
07/05/2026	Considered the areas in which expert evidence or further factual evidence would be required and prepared a working note on evidence gaps for discussion with the counsel team and Walkers in the coming week (2 hrs 15 mins)	2h 15m
07/05/2026	Considered the Rigmora skeleton and the authorities cited by Rigmora on trust and confidence, and began mapping the counter-arguments to be developed in ATP's Reply (2 hrs)	2h 0m
07/06/2026	Full working day on the trust and confidence trial: continued substantive preparation of ATP's case, including the outline of the opening submissions and the structure of cross-examination of the Rigmora witnesses (3 hrs 45 mins)	3h 45m
07/06/2026	Reviewed and considered the counsel-team's working papers on trust and confidence, and consolidated a working list of issues to be finalised with the counsel team the following day (2 hrs 30 mins)	2h 30m

07/06/2026	Reviewed the interaction between the trust and confidence trial and the officeholder points indicated by Justice Asif KC at the substratum hearing, and considered the practical impact of a positive substratum ruling on the shape of the TC trial (2 hrs)	2h 0m
07/06/2026	Attended to correspondence with Walkers on the FSD 151 of 2025 (JAJ) trial bundle and hearing arrangements, and coordinated internal work streams with Akash and Anson for the coming week (2 hrs)	2h 0m
07/07/2026	Reviewed the developing correspondence on the FSD 151 of 2025 (JAJ) trial bundle and hearing arrangements and joined the ATP Pre-Call with Walkers and Counsel arranged by Laure-Astrid Wigglesworth to coordinate positions ahead of the post-hearing conference (2 hrs) 45 mins)	2h 45m
07/07/2026	Attended the ATP Post-call catch-up arranged by Rebecca Moseley to take stock following the pre-call, discussing responses to Justice Asif KC's indications and how best to structure the counsel team's ongoing input (2 hrs 15 mins)	2h 15m
07/07/2026	Considered and approved with the counsel team the first draft of the list of issues for the trust and confidence trial (prepared by Akash and reviewed by Anson), and gave directions on circulating the list of issues to Walkers with a view to focussing the outstanding work (1 hr 45 mins)	1h 45m
07/07/2026	Corresponded with Laure-Astrid Wigglesworth on timing and Zoom logistics for the evening call and coordinated internal availability. Prep for call (1 hrs 15 mins)	1h 15m
07/07/2026	Reviewed further correspondence on the trial bundle and hearing arrangements, considered the Cayman/Delaware interaction and directed Akash and Anson on the emerging workstreams.(1 hr)	1h 0m
07/08/2026	Attended to ATP correspondence: consulted with Anson on where matters stood, explaining that no decisions had yet been made and that much would turn on the proposal expected from Campbells (1 hr 30 mins)	1h 30m
07/08/2026	Reviewed the draft order and email from Campbells on the TC trial and formed my preliminary views for the counsel team, flagging in particular the concern that any order should not have unintended extra-territorial effect, and that the counsel team's	1h 30m

	response would be affected by the position on the appeal (1 hr 30 mins)	
07/08/2026	Considered Akash's confirmation that he shared my preliminary views and would provide more detailed thoughts and comments on the order in the morning, and directed further work overnight (45 mins)	0h 45m
07/08/2026	Coordinated internally on the interaction between the Campbells proposal and the pending Cayman appeal, and the practical impact on the counsel team's ongoing tasks (30 mins)	0h 30m
07/09/2026	Convened a morning call with Akash to work through the Campbells draft order, the extra-territorial-effect concern and the counsel team's consolidated response (1 hr 45 mins)	1h 45m
07/09/2026	Directed and reviewed successive iterations of the proposed joint communication to the Cayman Court on the trial bundle and hearing arrangements, including the counsel-team amendments on the reservation of costs and the treatment of assisting further, and the interaction with the Delaware Chapter 11 proceedings (3 hrs)	3h 0m
07/09/2026	Considered Eric Winston's (Quinn Emanuel) emails on deleting the costs reservation on the ground that any order of a non-bankruptcy court concerning the reservation of a prepetition claim implicated the automatic stay; coordinated the counsel-team position with Jan Golaszewski and settled the final wording pushed back to Eric (2 hrs 30 mins)	2h 30m
07/09/2026	Reviewed and directed the counsel team's response on Rebecca Moseley's draft explaining to the Cayman Judge that the costs reservation had been removed for automatic-stay reasons, and settled Rebecca's final email to the Court (1 hr 45 mins)	1h 45m
07/09/2026	Reviewed Akash Sonecha's comments on the draft joint communication (the Delaware Order reference and the typo point) and consolidated the counsel-team position; Anson Cheung sign-off; coordinated with clients (Daniel P. Finkelman confirming his assent). (1 hr 15 mins)	1h 15m
07/09/2026	Reviewed the developing position on the "Idea for incoming Cayman officeholders" thread (Kathy Good) and considered the possible interaction with the Cayman officeholder issues raised at the substratum trial (1 hr 15 mins)	1h 15m

07/09/2026	Considered with Akash the position on the timing of the appeal in light of Seth Harrison's comments and confirmed that the appeal should be kept alive for at least a few weeks; directed Akash and Anson to keep on top of the ongoing correspondence on the order (30 mins)	0h 30m
07/10/2026	Considered the counsel team's further analysis of the Campbells proposed order (Akash and Anson having discussed the order between themselves) and the practical implications for the Cayman timetable. (1 hr 15 mins)	1h 15m
07/10/2026	Reviewed the draft order circulated by Campbells vacating the trust and confidence trial, together with Walkers' initial views; considered the position on whether ATP should agree to vacate the trust and confidence trial or reserve on the point in light of the officeholder issues indicated by Justice Asif KC (3 hr 30 mins)	3h 30m
07/10/2026	Advised on the counsel-team position, including the tactical position on how the reply to Campbells should be worded to make ATP's position clear without giving further ammunition to Rigmora or antagonising the Judge (2 hrs 15 mins)	2h 15m
07/10/2026	Reviewed Seth Harrison's email and coordinated the counsel-team position with Walkers (1 hr 45 mins)	1h 45m
07/10/2026	Reviewed Kathy Good's (Potter Anderson) email on the incoming Cayman officeholders and her preliminary view that Walkers may respond that they had not had time to diligence positions by the 22 July date, and considered the interaction with the Delaware timetable (30 mins)	0h 30m
07/10/2026	Corresponded with Rebecca Moseley on the evening Zoom logistics, joined the resulting call with Walkers and settled next steps on the trial bundle and the incoming officeholder work (30 mins)	0h 30m
07/11/2026	Engaged with Anson on where the case now stood following the correspondence with Campbells and Walkers, the possible mentions hearing on 29 July and how the counsel team's workstreams should be adjusted (1 hr 30 mins)	1h 30m
07/11/2026	Considered the fees position and reviewed the latest email from Rebecca Moseley in that light (1 hr)	1h 0m

07/11/2026	Considered the interaction with the developing officeholder position and the Delaware timetable ahead of the coming week (30 mins)	0h 30m
07/12/2026	Reviewed Akash Sonecha's email on the "rules of the road" — Akash and Anson's shared view that Justice Asif KC's order (in the stead of and to the exclusion of ATP III GP Ltd) might extend to agents of the general partner, potentially including the CRO appointed — and considered the practical implications for the counsel team, the general partner and the incoming officeholders (2 hrs 45 mins)	2h 45m
07/12/2026	Reviewed Eric Winston's (Quinn Emanuel) "Draft communication to A&M office holders" and began mapping the Cayman-side points to be pressed in comments (1 hr 15 mins)	1h 15m
07/12/2026	Corresponded internally with the counsel team on the Sunday planning for the coming week and directed Akash and Anson on the "rules of the road" advice and the A&M draft communication (1 hr)	1h 0m
07/13/2026	Convened a short counsel-team catch-up call to take stock of the current status of the engagement and the immediate next steps on the officeholder communication and the trial-bundle correspondence (1 hr)	1h 0m
07/13/2026	Reviewed Akash Sonecha's point on the risk that referring to Quinn Emanuel as "counsel for the debtors in possession" might be criticised by Rigmora LPs, having regard to Campbells' email of 9 July 2026 to the Court, and considered the counsel-team position on that risk. (2 hrs 15 mins)	2h 15m
07/13/2026	Reviewed and directed the counsel team's consolidated Cayman-side comments on Eric Winston's draft communication to A&M officeholders (Patty Tomasco (Quinn Emanuel) having produced a revised draft), including the position on the fourth bullet point (the Cayman Order having replaced ATP III GP as general partner meaning that the first sentence of the fourth bullet fell to be deleted); confirmed the counsel-team's only comment on Patty's revised draft (2 hrs 45 mins)	2h 45m
07/13/2026	Reviewed and settled Akash Sonecha's email on Quinn Emanuel's thinking on the "counsel for the debtors in possession" characterisation (1 hr 45 mins)	1h 45m

07/13/2026	Reviewed the further correspondence on the FSD 151 of 2025 (JAJ) trial bundle (Rebecca Moseley's forward of the Court version), confirmed that the amendments were essentially stylistic and confirmed the counsel team's position with Akash and Anson (1 hrs 45 mins)	1h 45m
07/13/2026	Reviewed the position on Walkers' confirmation to the Cayman Court that no further comments were required and coordinated with Rebecca Moseley on the timing of that confirmation (1 hr)	1h 0m
07/13/2026	Continued preparation on the officeholder motion, particularly on the interaction with the Cayman substratum order and the possible parallels with the Rigmora LPs' skeleton (30 mins)	0h 30m
07/14/2026	Reviewed the A&M officeholder motion (attached to Rebecca Moseley's email), and considered the counsel-team's initial reactions to the relief sought, the timetable and the interaction with the Chapter 11 cases and the pending Cayman substratum ruling (3 hrs)	3h 0m
07/14/2026	Reviewed Rebecca Moseley's email opening the "Preparing an objection to the officeholder motion" workstream and coordinated the counsel-team task allocation on drafting the objection to the officeholder motion (2 hrs 30 mins)	2h 30m
07/14/2026	Reviewed and dealt with Rebecca Moseley's "rules of the road" query from Dan Finkelman relating to PortCo directors hiring senior management of a PortCo within the boundaries of their existing powers, and Rebecca's tentative view; confirmed my agreement and instructed Akash and Anson accordingly (2 hrs 30 mins)	2h 30m
07/14/2026	Reviewed Anson Cheung's response — agreeing with Becky that if the Series A directors were directors of the PortCo, and derived their authority and powers solely by reason of that appointment, the position was tenable — and coordinated the counsel-team position for onwards transmission (1 hr 45 mins)	1h 45m
07/14/2026	Reviewed Shelley White's out-of-office note confirming her return on 15 July and her direction of urgent matters not otherwise copied, and adjusted the coordination plan accordingly (1 hr 15 mins)	1h 15m

07/14/2026	Continued early substantive work on the outline of the objection to the officeholder motion (the English-law analysis, and whether there is any equivalent to Cayman s.104(2) / s.95(3)(a) in the Insolvency Act 1986), and coordinated with Akash and Anson on research directions (1 hr 15 mins)	1h 15m
07/15/2026	Continued substantive work on the objection to the A&M officeholder motion, focussing on the Cayman s.104(2) and s.95(3)(a) powers and the absence of any true English-law equivalent, on Palmer's Company Law §15.801 on the judicial factor jurisdiction, and on distinguishing the Ablyazov line of authority (interim manager for a narrow purpose). (3 hrs)	3h 0m
07/15/2026	Reviewed Rebecca Moseley's email on the counsel-team's queries in from Eric Winston, including the Cayman-side answer on the absence of Cayman examples and the direction of travel, and her further note that Rigmora's skeleton referred to English authorities on receivers and managers which she would refresh her memory of; coordinated the counsel-team position on the English authorities to be considered (2 hrs 30 mins)	2h 30m
07/15/2026	Reviewed and directed the counsel team's note in progress on the objection to the officeholder motion, including the treatment of the Petitioners' Skeleton Argument dated 25 June 2026 and the interaction with the substratum evidence (1 hrs 45 mins)	1h 45m
07/15/2026	Reviewed Brett Haywood's (Potter Anderson) email on the Apple Tree Retention Application (Rigmora having filed a limited objection to the new KC retention on the ground that counsel should not receive pre-approval of a flat fee under section 328(a) of the bankruptcy code but rather be subject to section 330 review) and considered the counsel-team position on how to respond, coordinating with Walkers on the appropriate approach. (1 hrs 45 mins)	1h 45m
07/15/2026	Engaged with the counsel team on Potter Anderson's fees email, taking the point that the whole purpose of applying as we had was to avoid the reasonableness debate; Anson shared the counsel team's uncertainty as to whether Potter Anderson were recommending a particular route or why. Directed the counsel team on the tactical	1h 45m

	position going into the Apple Tree Retention Application. (1 hrs 45 mins)	
07/15/2026	Continued preparation for the Apple Tree Retention Application argument and the interaction with the wider question of the treatment of professional fees post-appointment of the officeholders (1 hrs 15 mins)	1h 15m
07/16/2026	Reviewed Anson Cheung's detailed English-law note on the Cayman officeholder motion (with a minor red-mark amendment) — no IA 1986 equivalent to Cayman s.105(1)/s.106 CA; Official Receiver ? liquidator under s.136(2)-(3); Palmer's Company Law §15.801 reference on the judicial factor jurisdiction; distinguishing Ablyazov (interim manager for narrow purpose) — and coordinated the counsel-team position; directed Akash and Anson on the next iteration of the objection (2 hrs 30 mins)	2h 30m
07/16/2026	Reviewed Brett Haywood's (Potter Anderson) escalating correspondence on the Apple Tree Retention Application (his view that the flat-fee structure was always a risk, and his subsequent explanations of the section 328(a) v Option B fee-application approach), and Kathy Good's (Potter Anderson) email explaining the difference between section 328(a) review and section 330 review.(4 hrs)	4h 0m
07/16/2026	Drafted and sent the substantive counsel-team position on the Apple Tree Retention Application, setting out the four principal points on direct market comparators, KC self-employment and the flat-fee/brief-fee rationale, the extent to which the flat fee is not worked out purely on hours, and the analogy to an investment bank and a success fee; confirmed that the counsel team should stick with the original plan and go with Option A, since any other option would mean fighting on Rigmora's territory and treating the flat fee as if it were an hourly rate structure (2 hrs)	2h 0m

07/16/2026	Consolidated the counsel-team responses on the Apple Tree Retention Application: Shelley White endorsing the approach; Akash Sonecha agreeing with the approach, drawing on paragraphs 25 and 26 of the retention motion and adding that Rigmora's objection ignored that the fees were earned in tranches so that any subsequent tranches would not be incurred if the proceedings fell away, making the fees in that sense contingent; and Anson Cheung's endorsement (1 hr 15 mins)	1h 15m
07/16/2026	Reviewed Rebecca Moseley's query on whether, if Rigmora were permitted the section 330 review, Counsel would have to file fee applications with the same level of time-entry detail on their invoices as US attorneys; and Shelley White's note that it would be very unfair to end up in that position after Counsel's fees had been incurred, and that the counsel team took the view that the fee arrangements were entirely justified; refined the counsel-team position accordingly (1 hr 15 mins)	1h 15m
07/16/2026	Reviewed Kathy Good's email on the newly appointed officeholders' request to adjourn the retention application and the funding application (a request to adjourn for a full month being unlikely to be palatable but a shorter adjournment potentially acceptable, particularly if we were agreeing to adjourn funding or their recognition motion by a brief period), and considered the counsel-team position on the proposed adjournment (1 hr 15 mins)	1h 15m
07/16/2026	Continued preparation on the objection to the officeholder motion in parallel with the Apple Tree Retention Application workstream, and consulted with the counsel team on the tactical position: Akash took the view that Rigmora's objections could not have been unforeseen and that the counsel team should proceed with the plan proposed by Potter Anderson to argue for pre-approval of the flat fee at the 22 July hearing; my instinct was to proceed as planned (45 mins)	0h 45m
07/17/2026	Continued work on the objection to the officeholder motion and on the counsel-team consolidation of the position, including on the proposed brief adjournment of the Apple Tree Retention Application; reviewed subsequent overnight correspondence from the US team (1 hr 45 mins)	1h 45m

07/17/2026	Reviewed the Cayman Grand Court judicial notifications received overnight, including [2026] CIGC (FSD) 58 (Segal J) Abraaj SPV 108 Limited and another v KE Holdings Limited — Further Discovery Judgment (17 July 2026) and [2026] CIGC (FSD) 50 (Ramsay-Hale CJ) Four Seasons Hotels Ltd et al v ProCro Acquisitions Limited — Reasons for Decision (26 June 2026), and considered whether any of the reasoning bore on the ATP substratum ruling awaited from Justice Asif KC (1 hr 15 mins)	1h 15m
07/17/2026	Attended to correspondence with Walkers on next steps, the officeholder motion and the interaction with the Chapter 11 hearing on 22 July (1 hr)	1h 0m
07/17/2026	Coordinated with Akash and Anson on remaining tasks (30 mins)	0h 30m

AKASH SONECHA

Date	Notes	Duration
05/29/2026	Reading in	9h 0m
05/30/2026	Reading in	7h 0m
05/31/2026	Legal research on loss of substratum	5h 0m
06/01/2026	Legal research on loss of substratum; drafting skeleton argument	7h 15m
06/02/2026	Drafting skeleton argument; attending telephone conferences with VFKC and AC	6h 30m
06/03/2026	Drafting skeleton argument	6h 0m
06/04/2026	Drafting skeleton argument	3h 30m
06/05/2026	Reviewing evidence; drafting skeleton argument	6h 0m
06/07/2026	Reviewing evidence; attending telephone conference with Walkers; drafting skeleton argument	5h 30m
06/08/2026	Drafting skeleton argument; reviewing evidence	3h 15m
06/09/2026	Reviewing correspondence; telephone conferences with clients and Walkers	3h 0m
06/10/2026	Reading witness statements; drafting skeleton argument	4h 15m
06/11/2026	Drafting skeleton argument	5h 45m
06/12/2026	Reviewing emails	0h 15m

06/13/2026	Reviewing letter to Court; telephone conference with VFKC and AC	1h 15m
06/14/2026	Drafting skeleton argument	4h 30m
06/15/2026	Drafting skeleton argument and preparing for hearing	5h 0m
06/16/2026	Preparing for hearing	4h 45m
06/17/2026	Preparing for hearing	8h 45m
06/18/2026	Preparing for hearing; drafting skeleton argument	11h 0m
06/19/2026	Advising on bundling; reviewing draft bundles	2h 45m
06/19/2026	Preparing for hearing	0h 30m
06/20/2026	Reviewing bundle index; advising on bundles	0h 45m
06/21/2026	Preparing for hearing	6h 0m
06/22/2026	Drafting skeleton argument and preparing for hearing	9h 30m
06/23/2026	Drafting skeleton argument; reviewing DP / Chronology; preparing for hearing; compiling authorities	11h 15m
06/24/2026	Preparing for hearing; drafting skeleton argument; reviewing bundle; telephone conference with solicitors and clients	8h 30m
06/25/2026	Preparing for hearing; drafting skeleton argument; reviewing bundle	7h 45m
06/26/2026	Reviewing Rigmora skeleton argument; preparing for hearing	9h 15m
06/27/2026	Preparing for hearing	1h 30m
06/28/2026	Preparing for hearing	14h 30m
06/29/2026	Preparing for hearing; telephone conference with VFKC and AC	5h 15m
06/30/2026	Prearing for hearing; attending hearing; preparing for hearing day 2	14h 45m
07/01/2026	Preparing for hearing day 2; reading transcript of hearing day 2	9h 30m
07/02/2026	Legal research on trust and confidence; reviewing pleadings	8h 15m
07/03/2026	Reviewing pleadings; telephone conference with solicitors	6h 45m
07/06/2026	Reading trust and confidence evidence	4h 0m
07/07/2026	Reading trust and confidence evidence; Preparing list of issues	6h 15m
07/08/2026	Drafting skeleton argument for trust and confidence trial	6h 0m

07/09/2026	Reviewing correspondence re draft Order and trust and confidence trial	3h 30m
07/10/2026	Reviewing draft Order	1h 0m
07/12/2026	Reviewing emails	1h 15m
07/13/2026	Reviewing draft Orders	1h 15m
07/15/2026	Legal research relating to Asif J Order	1h 30m

ANSON CHEUNG

Date	Notes	Duration
05/28/2026	Briefing with VFKC	0h 15m
05/29/2026	Reading in	8h 30m
05/31/2026	Reading in	8h 0m
06/01/2026	Reading, discussion with AS, liaising with Walkers and considering email	7h 0m
06/02/2026	Discussion of issues with AS, reading Walkers note and law, considering emails and liaising re list of points to cover	4h 45m
06/04/2026	Review of email and Ch 11 documents, liaising on Ch 11 documents	0h 30m
06/05/2026	Reading Delaware documents and new evidence from 4 June	6h 45m
06/06/2026	Reading Delaware documents and new evidence	5h 15m
06/07/2026	Call with Walkers on evidence	0h 45m
06/08/2026	Considering latest draft of witness statement, reviewing and amending, call with AS, reviewing memo and latest emails	2h 30m
06/09/2026	Reading case law, reviewing further emails, call on witness statements with AS and VFKC, calls with US and Cayman team	4h 45m
06/10/2026	Reviewing further witness statement, considering potential arguments on funding, call, considering further emails as to evidence	3h 0m
06/11/2026	Reviewing emails	0h 30m
06/12/2026	Reviewing emails	0h 15m
06/16/2026	Considering draft skeleton. Considering Singapore and HK substratum case law	6h 15m
06/17/2026	Research and reviewing case law	8h 30m
06/18/2026	Drafting skeleton and circulating	13h 30m
06/19/2026	Review of bundle index. Discussion with AS on speaking note and skeleton	1h 30m
06/20/2026	Considering bundle index with comments from Campbells	1h 15m

06/21/2026	Drafting on skeleton. Considering comments on skeleton	1h 45m
06/22/2026	Drafting speaking note. Discussion with AS	12h 45m
06/23/2026	Dealing with chronology, speaking note. Reviewing chronology, reviewing and amending speaking note, discussion with AS	6h 30m
06/24/2026	Reviewing speaking note, skeleton, considering emails and discussions with AS	5h 30m
06/25/2026	Preparing for hearing, skeleton, review of speaking note, and considering	2h 0m
06/26/2026	Call with VFKC and AS, review of skeleton and JPL Note	2h 0m
06/27/2026	Drafting speaking note and considering	4h 30m
06/28/2026	Amending JPL speaking note, call with VFKC, amending speaking note	3h 45m
06/29/2026	Research and drafting rebuttal bank, considering JPL and amending note, calls with VFKC and AS	9h 0m
06/30/2026	Preparing for hearing, amending JPL speaking note, attending hearing, Discussion post hearing, research, amending JPL Note and queries to Walkers	16h 30m
07/01/2026	Considering emails, reading transcript, amending speaking note, emails to Walkers, calls with AK and VFKC. Attending hearing	12h 15m
07/03/2026	Calls with counsel team, call with Walkers, considering TC law. Reading trust and confidence evidence	2h 30m
07/06/2026	Reading trust and confidence evidence, review of law on trust and confidence law	3h 0m
07/07/2026	Reading trust and confidence evidence and research, call with AS, emails re substratum ruling, call with Walkers team, reviewing list of issues and liaising with AS on TC	8h 0m
07/08/2026	Reading, research and drafting TC Skeleton, considering draft orders and Campbells letter and discussion with AS	4h 0m
07/09/2026	Considering emails, further draft orders and client instructions, reviewing and amending draft Orders, discussion with AS, considering emails and drafts	3h 15m
07/10/2026	Reviewing draft Order from the Court and discussion with AS, considering emails re draft order	1h 0m
07/12/2026	Considering emails overnight and draft email to A&M. Discussion with AS as to Asif J order	1h 15m
07/13/2026	Considering emails, call with counsel team and considering position, considering draft Order from Court	0h 45m

07/14/2026	Legal research, emails with QE re case strategy. Review of Cayman legal transcripts and answering QE queries	4h 30m
07/15/2026	Considering queries from QE	0h 30m
07/16/2026	Considering emails from AS, research and drafting email	1h 30m
07/22/2026	Liaising with VFKC	0h 15m
07/23/2026	Liaising with VFKC	0h 15m
07/24/2026	Liaising with Walkers re directions hearing, call to discuss next steps and points, drafting skeleton argument	8h 0min
07/25/2026	Amending skeleton and circulating	0h 45m
07/26/2026	Reviewing correspondence and considering	0h 15m
07/27/2026	Updating skeleton and recirculating. Attending calls with Walkers and VFKC, further amendments to skeleton. Drafting speaking note.	11h 0m
07/28/2026	Amending speaking note and circulating, attending calls with QE, VFKC, and Walkers	10h 0m
07/29/2026	Considering latest filings, updating speaking note and reviewing edits, call with VFKC, liaising with Walkers, attending hearing	4h 30m
07/29/2026	Considering latest filings, updating speaking note and reviewing edits, call with VFKC, liaising with Walkers, attending hearing, post-hearing call	4h 30m
07/30/2026	Considering emails on US order, calls with US team	1h 0m
07/31/2026	Review of emails and attachments from Walkers	1h 0m
08/03/2026	Review of emails from QE and Walkers	0h 15m

EXHIBIT D

INVOICES

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

7-8 Essex Street
London
WC2R 3LD
DX: LDE 302

Tel: 020 7379 3550
Fax: 020 7379 3558
Email: fees@brickcourt.co.uk

Miss Shelley White,
Walkers,
190 Elgin Avenue,
George Town,
Grand Cayman,
KY1-9001,
Cayman Islands

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 04/06/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF661 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
15/05/2026	Received initial instructions from Walkers sending electronic copies of the pleadings in the Cayman winding-up petition and parallel writ proceedings, together with injunction orders and the December 2025 witness evidence bundle. Acknowledged instructions, confirmed preference to work from electronic bundles only, and requested further material on directions for the forthcoming hearings, prior skeletons and transcripts from the earlier hearings before Asif J, and any existing thinking on the intended approach to the forthcoming hearings (2 hrs 30 mins)			
16/05/2026	Began substantive reading-in across the core Cayman materials, focusing on the Amended Winding-Up Petition, the Amended Defence and Amended Reply, and the parallel writ pleadings concerning the 30 May 2025 capital calls. Reviewed the injunction orders of Asif J dated 20 June 2025 and 1 August 2025 to understand the interim relief granted, the restriction on capital calls and default notices, and the relationship with validation issues under the Companies Act. Skimmed the December 2025 witness evidence in order to identify how the GP, the Rigmora entities and other limited partners had presented the capital-call and budget-approval history, the Braeburn and Amendment 22 context, and the alleged breakdown of trust and confidence (8 hrs 30 mins)			
17/05/2026	Worked through the Cayman hearing transcript from 1 August 2025 before Asif J, concentrating on the overlap between the Cayman writ proceedings and the Delaware complaint of 30 May 2025, the 15 May 2025 email as alleged repudiatory conduct, and the capital-call and budget-approval regime under the limited partnership agreement. Identified key themes including the global default mechanism, the distinction between capital contribution and ownership, the contractual framework for capital calls, default notices and voting-right suspension, and the court's focus on whether the interim relief genuinely held the ring without forcing payment under pressure of default consequences. Cross-referenced those themes to the petition and writ pleadings to see how loss of substratum and loss of trust and confidence were being advanced and resisted (8 hrs)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	**Brick Court Chambers No. 4 Account**	**Bank:**	**BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP**
Account Number:	**[redacted]1412**	**IBAN:**	**GB42 BARC 2000 0093 3814 12**
Sort Code:	**20-00-00**	**Swift Code:**	**BARCGB22**

Printed By: Collette Vanner 4 June 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 04/06/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF661 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
18/05/2026	Studied in detail the memorandum addressing the loss-of-substratum issue, together with the underlying Cayman and English authorities relevant to impossibility, impracticability, reasonable expectations and rescue or continuation scenarios. Considered how those authorities applied to ATP, particularly the distinction between impossibility and impracticability as tests for loss of substratum, the weight to be given to the purpose clause in the limited partnership agreement, the extent to which the court would look to Rigmora's reasonable expectations, and whether a Chapter 11 rescue plan and new capital could preserve substratum notwithstanding refusal to fund further. Started sketching how these strands might be combined at trial, including the argument that the Partnership's substratum had not been lost if it could continue to invest in biotech through Chapter 11 financing and new investors, and the counter-argument based on expectations at inception and the Braeburn arrangements (10 hrs 30 mins)			
19/05/2026	Continued detailed review of the loss-of-substratum advice and the authorities to which it referred, including materials dealing with post-petition events, timing, reasonable expectations, soft wind-down situations and the possible relevance of rescue proposals. Considered the possibility of arguing that the petition had been premature when filed because substantial contingent subscriptions remained, and the alternative argument that Chapter 11 restructuring could not properly be ignored when assessing whether there was an inevitable loss of funding leading to loss of substratum. Began to outline the structure for a skeleton argument dealing with statutory framework, purpose clause, expectations, funding runway, Chapter 11 plan, and the distinction between rescue and ad hoc wind-down (10 hrs 30 mins)			
20/05/2026	DISBURSEMENTS:- - EXP Certificate of Good Standing	£36.00	0%	£0.00
20/05/2026	DISBURSEMENTS:- - EXP Police Certificate	£125.00	0%	£0.00
20/05/2026	Reviewed additional procedural and logistical matters arising from the Cayman proceedings at a high level while continuing analysis of the petition pleadings and associated materials. Mapped the distinct heads of claim, namely loss of substratum, just and equitable winding up, and the relief sought, including the evolving focus on declarations and appointment of office-holders in place of the general partner. Revisited further authority on reasonable expectations, management conduct and the proper approach to winding-up relief in order to test how those points might be deployed by or against ATP (10 hrs)			
21/05/2026	Worked on successive drafts of the Re-Amended Defence, reviewing proposed amendments and considering how best to plead the contractual and fiduciary framework under acute time pressure. Suggested corrections and strategic edits, and prepared for a follow-up conference with Walkers and Seth Harrison to finalise the language around continuation, viability, Chapter 11 and capital-call headroom in light of the Delaware and Chapter 11 backdrop (9 hrs 30 mins)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	**Brick Court Chambers No. 4 Account**	**Bank:**	**BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP**
Account Number:	**[redacted]1412**	**IBAN:**	**GB42 BARC 2000 0093 3814 12**
Sort Code:	**20-00-00**	**Swift Code:**	**BARCGB22**

Printed By: Collette Vanner - 4 June 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 04/06/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF661 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
22/05/2026	Following the conference with Walkers and Seth Harrison, refined ATP's pleaded case on continuation and viability, advising against overly specific references in the pleading that might prove tactically unhelpful and preferring broader language directed to continuation through existing cash, realisations, financings, disposals, restructurings and remaining committed capital. Confirmed that the amended wording kept the position open while allowing evidential development later. In parallel, considered how best to position the Delaware judgment and whether it could be said that, even absent Chapter 11, it did not itself trigger immediate loss of substratum because funds remained and the Partnership could still be wound down in an orderly way under the limited partnership agreement (9 hrs 30 mins)			
23/05/2026	Reviewed and consolidated internal working materials addressing substratum, Delaware issue estoppel and trial background, drawing together the developing analysis of the Cayman petition, the parallel Delaware findings and the arguments likely to arise at the June hearing. Considered at a high level how the Cayman loss-of-substratum case, the trust and confidence allegations and the Delaware findings could most coherently be presented together, and refined the developing internal narrative for use in further drafting and preparation (10 hrs)			
24/05/2026	Returned to the loss-of-substratum authorities in detail, reviewing the Cayman and English cases and related materials on impossibility, impracticability, reasonable expectations, soft wind-downs and the relevance of rescue proposals. Extracted and organised the key points most likely to matter for ATP, including the interaction between the purpose clause, investor expectations, funding position, and the question whether post-petition restructuring or new capital could properly be taken into account (10 hrs 30 mins)			
25/05/2026	Applied the reviewed authorities and working notes back to ATP's factual position, considering in more detail the strengths and weaknesses of the petitioners' loss-of-substratum case and ATP's continuation case. Refined the internal analysis on timing, post-petition events, reasonable expectations, and the possible treatment of Chapter 11 measures and future funding, with a view to feeding those points into the forthcoming skeleton argument and any further pleading or evidential work (9 hrs 30 mins)			
26/05/2026	Reviewed further materials relevant to the Cayman proceedings and considered the newly served summons seeking the appointment of joint provisional liquidators over the Partnership to act in place of the general partner, together with the proposed timetable for responsive evidence and directions. Assessed at a high level how that application interacted with the existing directions for the forthcoming trust and confidence and substratum trial, and with the Chapter 11 stay in Delaware, including the risk that such relief could cut across the restructuring and effectively sideline the general partner (9 hrs 30 mins)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	**Brick Court Chambers No. 4 Account**	**Bank:**	**BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP**
Account Number:	**[redacted]1412**	**IBAN:**	**GB42 BARC 2000 0093 3814 12**
Sort Code:	**20-00-00**	**Swift Code:**	**BARCGB22**

Printed By: Collette Vanner - 4 June 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 04/06/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF661 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
27/05/2026	Engaged urgently on the summons seeking joint provisional liquidators, including the implications of the United States lawyers' view that the application represented a breach of the Chapter 11 stay and the need to resist the application in Cayman while coordinating with the Delaware position. Held an urgent conference with Walkers to map out the evidence needed to oppose the summons, plan the Cayman response on directions, and coordinate with United States counsel on the stay position. Also dealt at a high level with related procedural and practical matters arising from the cross-border posture of the case (10 hrs 30 mins)			
28/05/2026	Reviewed in detail the petitioners' Re-Amended Reply together with the Re-Amended Defence, considering in particular the sharpened battleground over whether Chapter 11 and new funding could preserve the substratum and how the joint provisional liquidator summons interacted with the relief now sought. Checked specific pleading points and began sketching the structure for the responsive skeleton argument, including substratum and appropriate relief, trust and confidence, contractual funding and default issues under the limited partnership agreement, and Delaware, issue-estoppel and abuse-of-process points. Also considered at a high level certain practical matters arising from the ongoing conduct of the proceedings (10 hrs 30 mins)			
28/05/2026	Stage one of agreed fee	£450,000.00	0%	£0.00
04/06/2026	Stage two of agreed fee	£300,000.00	0%	£0.00

VAT SUMMARY
0% (EXPENSE) Amount: £161.00, VAT: £0.00,
0% (FEE) Amount: £750,000.00, VAT: £0.00

Sub Total	£750,161.00
Total VAT	£0.00
Total	£750,161.00

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name: Brick Court Chambers No. 4 Account
Account Number: [redacted]1412
Sort Code: 20-00-00
Bank: BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP
IBAN: GB42 BARC 2000 0093 3814 12
Swift Code: BARCGB22

Printed By: Collette Vanner - 4 June 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

7-8 Essex Street
London
WC2R 3LD
DX: LDE 302

Tel: 020 7379 3550
Fax: 020 7379 3558
Email: fees@brickcourt.co.uk

Miss Shelley White,
Walkers,
190 Elgin Avenue,
George Town,
Grand Cayman,
KY1-9001,
Cayman Islands

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 18/06/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF673 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
09/06/2026	DISBURSEMENTS:- - EXP Flights	£401.10	0%	£0.00
09/06/2026	DISBURSEMENTS:- - EXP Hotel	£210.49	0%	£0.00
09/06/2026	DISBURSEMENTS:- - EXP Flights	£4,399.99	0%	£0.00
18/06/2026	Stage three of agreed fee	£300,000.00	0%	£0.00

VAT SUMMARY
0% (EXPENSE) Amount: £5,011.58, VAT: £0.00,
0% (FEE) Amount: £300,000.00, VAT: £0.00

Sub Total	£305,011.58
Total VAT	£0.00
Total	£305,011.58

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name: Brick Court Chambers No. 4 Account
Account Number: [redacted]1412
Sort Code: 20-00-00
Bank: BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP
IBAN: GB42 BARC 2000 0093 3814 12
Swift Code: BARCGB22

Printed By: Cara Riches 18 June 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

7-8 Essex Street
London
WC2R 3LD
DX: LDE 302

Tel: 020 7379 3550
Fax: 020 7379 3558
Email: fees@brickcourt.co.uk

Miss Shelley White,
Walkers,
190 Elgin Avenue,
George Town,
Grand Cayman,
KY1-9001,
Cayman Islands

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 03/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF686 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
29/05/2026	Continued reading-in across the expanded Cayman and Delaware materials in the electronic bundles, including the December 2025 witness statements, directions orders, skeletons and transcripts, and forwarded the Re-Amended Reply and the JPL summons materials internally to Akash Sonecha and Anson Cheung (3 hrs 15 mins)			
29/05/2026	Began mapping which evidence would matter most for the loss-of-substratum hearing and for any subsequent trust and confidence trial, and worked through the interplay between the Delaware judgment and the Cayman petition (2 hrs 45 mins)			
29/05/2026	Held a strategy meeting with Akash and Anson to set the overall direction for the Cayman substratum and trust and confidence proceedings, covering issue-estoppel risks and opportunities, the relationship between Chapter 11 restructuring and the Rigmora provisional-liquidator application, and the tight timetable for evidence, cross-examination and bundles; agreed tasks for Akash and Anson (Delaware reading-in, issue list, evidence-needs schedule and a working draft skeleton and speaking note), and coordinated with Walkers on introductions and division of work (3 hrs 15 mins)			
30/05/2026	Continued detailed review of the substratum authorities and comparative materials, including Cayman, BVI, English, Hong Kong and Singapore cases and commentary, with a view to refining the legal test and identifying the most helpful authorities on impossibility, impracticability, reasonable expectations and locked-up capital (3 hrs 30 mins)			
30/05/2026	Read and considered the Hong Kong and Singapore materials gathered over the weekend and began to integrate those themes into the developing Cayman argument, particularly as to whether the court should focus on the purpose clause, investor expectations or broader fairness considerations (2 hrs 30 mins)			
30/05/2026	Updated the working outline for the substratum skeleton and related internal notes to reflect the comparative authorities and their possible use at trial (2 hrs 30 mins)			
31/05/2026	Applied the comparative case-law analysis back to ATP's facts, considering how the Hong Kong and Singapore authorities might support ATP's position on identifying the Partnership's main purpose, the proper role of reasonable expectations, and the significance of keeping limited partners locked into the vehicle where a rescue route remains available (3 hrs 30 mins)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	**Brick Court Chambers No. 4 Account**	**Bank:**	**BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP**
Account Number:	**[redacted]1412**	**IBAN:**	**GB42 BARC 2000 0093 3814 12**
Sort Code:	**20-00-00**	**Swift Code:**	**BARCGB22**

Printed By: Collette Vanner 3 July 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 03/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF686 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
31/05/2026	Reviewed further materials concerning the proposed deal structure and how that might be characterised by the petitioners as abandonment, and considered how to answer that point without undermining ATP's continuation case (2 hrs 30 mins)			
31/05/2026	Continued developing the internal argument on the proper legal test, appealable points of principle and the extent to which post-petition rescue proposals can and should be taken into account (2 hrs 30 mins)			
01/06/2026	Returned to the pleadings, witness materials and limited partnership agreement in light of the developing comparative-law and substratum analysis; also reviewed and approved the redlined draft of my Cayman admission affidavit forwarded by Laure-Astrid Wigglesworth (4 hrs 30 mins)			
01/06/2026	Reviewed again the re-amended petition, re-amended defence and re-amended reply, focusing on the pleaded position as to funding runway, management and operating expenses, Braeburn and other portfolio companies, and the significance of the contractual end date (4 hrs 30 mins)			
01/06/2026	Considered how the evidential case should answer the petitioners' allegation of inevitable failure and what documentary and witness material would be needed to support ATP's position that the Partnership could lawfully and practically continue through Chapter 11, asset realisations and further funding (3 hrs 45 mins)			
02/06/2026	Reviewed the draft Fifth Affirmation of Yuri Bogdanov and the evolving list of evidence for the substratum hearing, checking whether the proposed exhibits would sufficiently address the Partnership's funding runway, Chapter 11 restructuring, Braeburn's position and relevant Delaware rulings (3 hrs 15 mins)			
02/06/2026	Took part in a strategy meeting with Akash and Anson focused on evidence planning, including how best to demonstrate that the Partnership could lawfully and practically continue notwithstanding funding headwinds, the extent to which consent requirements could be worked around in Chapter 11, and whether any inconsistency between the petitioners' Cayman substratum case and their position in the bankruptcy proceedings should be deployed (3 hrs 15 mins)			
02/06/2026	Settled the framework for an evidence-needs list for Walkers, including limited partnership agreement powers, funding options, asset realisations and causation of difficulties; approved dispatch of the counsel-team list of evidence and questions to Walkers; and agreed that Walkers should assemble a dedicated trust and confidence folder.(4 hrs 30 mins)			
03/06/2026	Analysed in more detail the Delaware materials assembled by Quinn Emanuel and Walkers' table of relevant Delaware evidence, focusing on how the Delaware court had approached funding, capital calls and the relationship between Chapter 11 and the Cayman proceedings; considered Walkers' consolidated list of documents referenced across the Grand Court witness statements (4 hrs 30 mins)			
03/06/2026	Considered how far ATP could rely on the Delaware findings consistently with issue-estoppel principles and comity, and which points were likely to be contested by Rigmora (3 hrs 15 mins)			
03/06/2026	Fed those points into the developing outline for ATP's substratum evidence and thinking on cross-examination and witness preparation (3 hrs 15 mins)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	**Brick Court Chambers No. 4 Account**	**Bank:**	**BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP**
Account Number:	**[redacted]1412**	**IBAN:**	**GB42 BARC 2000 0093 3814 12**
Sort Code:	**20-00-00**	**Swift Code:**	**BARCGB22**

Printed By: Collette Vanner - 3 July 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 03/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF686 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
04/06/2026	Reviewed Walkers' draft letter on trial logistics and the emerging plan for witnesses, cross-examination and court time, to ensure alignment with the developing legal and evidential strategy on substratum and related issues (3 hrs 15 mins)			
04/06/2026	Read and considered further United States materials and declarations, including material from Perry Mandarino and Seth Harrison, with a view to how their evidence could be deployed in Cayman without cutting across the United States court's supervision of the restructuring; digested the loss-of-substratum evidence just received from the Rigmora LPs and the accompanying exhibit link (3 hrs 15 mins)			
04/06/2026	Continued refining the list of evidential topics and legal issues to be addressed in ATP's response evidence and at the hearing; dealt at a high level with the parallel BVI injunctive relief matter which had come back live via the clerks (4 hrs 15 mins)			
05/06/2026	Reviewed the sealed version of the Fifth Bogdanov affirmation together with Walkers' latest note on substratum arguments and evidence, and updated the internal analysis of the factual battleground, including funding runway, Braeburn and other portfolio companies, Chapter 11, and investor expectations (3 hrs 15 mins)			
05/06/2026	Joined a meeting with Akash and Anson to refine strategy for the substratum hearing in light of the Delaware findings and the demanding evidence timetable, discussing the correct Cayman test for loss of substratum, how best to characterise the Delaware judgment and Chapter 11 in submissions, the relationship with any provisional-liquidator appointments, and how to keep trust and confidence issues largely in reserve (3 hrs 15 mins)			
05/06/2026	Agreed next steps for Akash and Anson to progress the skeleton argument, speaking note and evidence planning while liaising with Walkers on timing and coordination, and continued related drafting and preparation (4 hrs 30 mins)			
06/06/2026	Reviewed and commented on the draft ATP affidavits, including the draft affidavits of Perry Mandarino and Seth Harrison for the loss-of-substratum trial, checking for consistency with the pleaded case, the Delaware materials and the developing legal analysis.(3 hrs 30 mins)			
06/06/2026	Suggested refinements to the narrative on the Partnership's purpose, funding history, current position and future plan, including clarification of how Chapter 11 and new investors could preserve substratum and why the appointment of provisional liquidators would be inconsistent with both Cayman principles and the United States restructuring (2 hrs 30 mins)			
06/06/2026	Ensured that the evidence preserved flexibility for appealable points on the proper legal test and the treatment of rescue plans (2 hrs 30 mins)			
07/06/2026	Undertook a detailed consolidation of all ATP work done, working through the chronology of instructions, pleadings, authorities, meetings, drafts and evidence (4 hrs 30 mins)			
07/06/2026	Reviewed the further round of draft affidavits (including Walkers' revised drafts of the Harrison and Mandarino evidence), the Rigmora loss-of-substratum evidence and the accompanying exhibits, to identify points that needed to be picked up in comments to the solicitor and counsel team (1 hr 30 mins)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	**Brick Court Chambers No. 4 Account**	**Bank:**	**BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP**
Account Number:	**[redacted]1412**	**IBAN:**	**GB42 BARC 2000 0093 3814 12**
Sort Code:	**20-00-00**	**Swift Code:**	**BARCGB22**

Printed By: Collette Vanner - 3 July 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 03/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF686 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
07/06/2026	Dictated and sent detailed comments to Walkers and the counsel team on the evolving evidence and skeleton position, including on the treatment of Chapter 11, funding runway and the JPL summons response (1 hr)			
07/06/2026	Joined a Zoom strategy call with Walkers to talk through the affidavit and skeleton position, next-week tasks and the interaction with the Delaware proceedings; assets for that meeting were subsequently released to me by the meeting platform (30 mins)			
08/06/2026	Reviewed in detail Walkers' redline of Dr Seth Harrison's affidavit received early morning from Rebecca Moseley, including the Sally Jacob witness statement query and the interaction with Perry Mandarino's evidence and the QE-cleared US materials (3 hrs 45 mins)			
08/06/2026	Responded to Walkers (14:02) with substantive drafting comments on the Harrison affidavit, focussing on treatment of Chapter 11 funding, Braeburn and the continuation case, and consistency with the pleaded position and the Fifth Bogdanov affirmation (2 hrs 30 mins)			
08/06/2026	Considered Walkers' indemnity memorandum circulated by Becky Moseley dealing with the Chapter 11 stay position, the JPL summons and the impact on the substratum trial timetable, and prepared for the 5pm Cayman-time call on Tuesday 9 June (2 hrs)			
08/06/2026	Continued detailed reading of the Rigmora loss-of-substratum evidence and Fifth Bogdanov affirmation exhibits, cross-checking against the counsel-team evidence-needs schedule (2 hrs 30 mins)			
08/06/2026	Progressed the substratum skeleton structure on the strength of the developing evidence and Delaware analysis, and coordinated tasks with Akash and Anson (2 hrs)			
09/06/2026	Attended the 5pm Cayman-time (10pm UK) call with Walkers on the indemnity memo, the Chapter 11 stay and the interaction with the JPL summons and the substratum trial; discussed responsive evidence strategy and the position on cross-examination (3 hrs)			
09/06/2026	Reviewed and commented on the further round of Walkers' drafts of the Harrison and Mandarino affidavits, including QE-cleared amendments, and settled the counsel team's consolidated comments (3 hrs)			
09/06/2026	Worked through the Delaware Chapter 11 timeline and the interaction with the Cayman substratum trial, in particular the impact of Judge Silverstein's clarification and the sanctions position advanced by ATP (2 hrs 30 mins)			
09/06/2026	Continued drafting the substratum skeleton framework and directing Akash and Anson on the loss-of-substratum, trust and confidence and issue-estoppel sections (2 hrs 30 mins)			
09/06/2026	Corresponded with Walkers on the JPL summons hearing arrangements and the proposed joint communication to Justice Asif (1 hr 15 mins)			
10/06/2026	Reviewed and commented on the multiple iterations of the Mandarino affidavit circulated through the day. advising on structure, treatment of the Chapter 11 funding motions (paragraph 26), the appointment of a Chapter 7 trustee (paragraph 20(c)) and the extent to which references to Rigmora's conduct should remain in the evidence (4 hrs)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	**Brick Court Chambers No. 4 Account**	**Bank:**	**BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP**
Account Number:	**[redacted]1412**	**IBAN:**	**GB42 BARC 2000 0093 3814 12**
Sort Code:	**20-00-00**	**Swift Code:**	**BARCGB22**

Printed By: Collette Vanner - 3 July 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 03/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF686 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
10/06/2026	Coordinated the QE input from Eric Winston and Alain Jaquet with the Walkers drafts and provided the counsel team's consolidated position (2 hrs 30 mins)			
10/06/2026	Reviewed the developing draft of the Harrison affidavit alongside the Mandarino evidence and considered coherence between the two on funding runway, the Delaware findings and the Partnership's continuation case (2 hrs)			
10/06/2026	Continued detailed work on the substratum skeleton and reviewed further US filings and correspondence in relation to the Sanctions Motion and the Clarification Motion in Delaware (2 hrs)			
10/06/2026	Confirmed travel/attendance arrangements for the 30 June/1 July hearing with Izabella Arnold and coordinated with clerks on Cayman logistics (1 hr 15 mins)			
10/06/2026	Progressed the JPL summons research work-stream (following the Walkers/Chris research memo forwarded 19:47 the following evening) and planned the response on directions and cross-examinations (1 hr 15 mins)			
11/06/2026	Sworn my Cayman admission affidavit remotely with the Court clerk in the morning (Cayman time) in accordance with the arrangements confirmed by Laure-Astrid Wigglesworth, and dealt with the follow-up scanning and dispatch to Walkers (4 hrs)			
11/06/2026	Reviewed the loss-of-substratum evidence in preparation for the 1pm Cayman-time deadline on agreement on cross-examination of witnesses; concluded, on Akash Sonecha's further analysis, that we should not seek cross-examination, and advised Walkers accordingly (2 hrs 30 mins)			
11/06/2026	Reviewed Chris's JPL summons research memorandum on the argument that Justice Asif cannot (or at least should not) exercise the section 104(2) and section 95(3)(a) powers so as to install office-holders during the substratum trial, and considered how this fits with the response to the JPL summons (2 hrs 30 mins)			
11/06/2026	Continued drafting and directing the substratum skeleton work, and reviewed the position on the joint communication to the Court with Campbells (2 hrs)			
11/06/2026	Dealt with logistics and correspondence on Cayman admission, hearing bundles and JPL summons research (2 hrs)			
12/06/2026	Reviewed the draft joint communication to the Court from Campbells (forwarded by Becky Moseley 19:54) and Walkers' initial comments; advised on the substance of the joint statement, including whether to include the Respondent's reservation of rights on Justice Asif's power to appoint JPLs after the substratum hearing (3 hrs 45 mins)			
12/06/2026	Continued detailed work on the substratum skeleton and further review of the loss-of-substratum authorities and comparative materials, and considered how to structure the presentation of the Delaware findings (2 hrs 30 mins)			
12/06/2026	Attended to correspondence with Shelley White on the JPL summons research, including the transmission of the counsel team's points to the US team ahead of the 24 June hearing (2 hrs)			
12/06/2026	Reviewed the position on trial bundles and the interaction with the Opus 2 arrangements in the light of the developing correspondence with Campbells (2 hrs 30 mins)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	**Brick Court Chambers No. 4 Account**	**Bank:**	**BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP**
Account Number:	**[redacted]1412**	**IBAN:**	**GB42 BARC 2000 0093 3814 12**
Sort Code:	**20-00-00**	**Swift Code:**	**BARCGB22**

Printed By: Collette Vanner - 3 July 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 03/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF686 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
12/06/2026	Coordinated with Akash and Anson on skeleton drafting, speaking note structure and Delaware issue-estoppel points (2 hrs)			
13/06/2026	Deep reading of the substratum authorities and comparative materials (Cayman, English, BVI, Hong Kong and Singapore) in preparation for the skeleton drafting, focussing on the argument that a Chapter 11 rescue plan and new capital can preserve substratum (3 hrs 30 mins)			
13/06/2026	Advanced my own draft of the substratum skeleton framework and worked through the treatment of the purpose clause, reasonable expectations, funding runway, the Braeburn arrangements and the Delaware findings (3 hrs)			
13/06/2026	Reviewed and commented on Akash's draft chronology, dramatis personae and skeleton sections in progress; sent directions on scope and cross-referencing (2 hrs)			
14/06/2026	Continued detailed work on the substratum skeleton, in particular the sections on impossibility/impracticability, purpose clause, reasonable expectations and the Delaware backdrop (3 hrs 13 mins)			
14/06/2026	Reviewed the Delaware materials (Judge Silverstein's clarifications, the Sanctions Motion, the Clarification Motion and the funding motions) and their interaction with the Cayman substratum case (2 hrs 30 mins)			
14/06/2026	Prepared for the coming week's tasks including the Apple Tree retention application, the substratum skeleton first-circulation deadline and the JPL summons response, and gave directions to Akash and Anson on next steps (2 hrs 30 mins)			
15/06/2026	Worked on the substantive draft of the substratum skeleton, focussing on the loss-of-substratum test, the treatment of Chapter 11, the Braeburn position and the funding runway argument (3 hrs 45 mins)			
15/06/2026	Reviewed further Cayman and English authorities on winding up and rescue and their application to ATP; refined the framework for reasonable-expectations argument (3 hrs)			
15/06/2026	Directed Akash and Anson on skeleton sections and reviewed successive drafts of the introduction and the substratum authorities section (2 hrs 30 mins)			
15/06/2026	Corresponded with Walkers on skeleton timing, evidence status and the trial bundle position; reviewed the emerging position on the Opus 2 arrangements (2 hrs)			
15/06/2026	Reviewed further US-side developments including Delaware filings and the interaction with the Cayman timetable (1 hr 15 mins)			
16/06/2026	Continued work on the substantive draft of the substratum skeleton, including the sections on the purpose clause and the interaction with the Chapter 11 rescue plan (3 hrs 15 mins)			
16/06/2026	Reviewed the Campbells mark-up of the proposed joint communication to Justice Asif (received via Walkers) and considered points to be pressed and points to be conceded, including on the Opus 2 correspondence and the position on the JPLs summons (2 hrs 30 mins)			
16/06/2026	Reviewed Walkers' response to Campbells on the trial bundle index and provided drafting directions on the position to be taken with Campbells and, if necessary, with the Court (2 hrs 30 mins)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	**Brick Court Chambers No. 4 Account**	**Bank:**	**BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP**
Account Number:	**[redacted]1412**	**IBAN:**	**GB42 BARC 2000 0093 3814 12**
Sort Code:	**20-00-00**	**Swift Code:**	**BARCGB22**

Printed By: Collette Vanner - 3 July 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 03/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF686 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
16/06/2026	Reviewed the updated position on cross-examination (Campbells having now agreed there would be no cross-examination at the loss-of-substratum trial, as confirmed by Rebecca Moseley on 16 June 21:13) and revised the trial-preparation plan accordingly (2 hrs)			
16/06/2026	Continued preparation for the Apple Tree retention application in Delaware, including reading through the draft retention application circulated by Halley Dannemiller of Potter Anderson (1 hr 15 mins)			
16/06/2026	Directed Akash and Anson on the JPL/substratum speaking note and the response to Campbells on trial logistics (1 hr 15 mins)			
17/06/2026	Reviewed and drafted comments on the Apple Tree retention application received the previous evening from Halley Dannemiller (Potter Anderson), and sent substantive comments at 06:17 (confirmed as received by Potter Anderson at 05:23 US time on 17 June) covering the scope of Cayman work, the s.24(5)(j) position and the interaction with limited admission (2 hrs 45 mins)			
17/06/2026	Considered Akash Sonecha's follow-up (09:47) on the possibility of continuing to work on the case after 30 June under s.24(5)(j) of the 2020 Act, and coordinated with the clerks on the Cayman admission position (2 hrs)			
17/06/2026	Continued detailed work on the substantive draft of the substratum skeleton and directed Akash and Anson on completion for first circulation, in response to Becky Moseley's 19:42 chase (4 hrs)			
17/06/2026	Reviewed the further Campbells mark-up of the joint communication to the Court (Becky Moseley 02:49) and advised on final position, including whether to concede the deletion of the paragraph on Justice Asif's power to appoint JPLs after the substratum hearing (2 hrs)			
17/06/2026	Reviewed the developing trial-bundle correspondence with Campbells and the position on the Opus 2 arrangements (1 hr 15 mins)			
17/06/2026	Reviewed the US Chapter 11 developments and Delaware filings and prepared for the imminent circulation of the substratum skeleton to Walkers (1 hr 15 mins)			
18/06/2026	Finalised the counsel-team draft of the substratum skeleton for first circulation, working through the treatment of the loss-of-substratum test, the interaction with the Chapter 11 rescue plan, the Braeburn and funding runway analysis and the Delaware backdrop; instructed Akash to circulate to Walkers by COB (5 hrs)			
18/06/2026	Reviewed the trial logistics correspondence between Walkers and Campbells and directed Walkers on the position to be taken on the trial bundle index (Laure-Astrid Wigglesworth 22:00 update on putting the onus back on Campbells to provide a revised index) (2 hrs 45 mins)			
18/06/2026	Continued review of the Delaware materials and correspondence, including the position on the JPL summons and the Sanctions Motion, and the interaction with the joint communication to the Court (2 hrs)			
18/06/2026	Directed Akash and Anson on the JPL/substratum speaking note and reviewed drafts of the chronology and dramatis personae in progress (2 hrs)			
18/06/2026	Corresponded with Walkers on hearing logistics, admission requirements and travel arrangements for the 30 June/1 July hearing (2 hrs)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	**Brick Court Chambers No. 4 Account**	**Bank:**	**BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP**
Account Number:	**[redacted]1412**	**IBAN:**	**GB42 BARC 2000 0093 3814 12**
Sort Code:	**20-00-00**	**Swift Code:**	**BARCGB22**

Printed By: Collette Vanner - 3 July 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 03/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF686 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
19/06/2026	Circulated the counsel-team's Loss of Substratum Skeleton to Walkers in the morning through Akash Sonecha's 11:10 email ("we now have an advanced draft of the skeleton on the stocks"); managed subsequent comments and the review process with Shelley White, Becky Moseley and Laure-Astrid Wigglesworth (Shelley's 11:48 acknowledgement) (3 hrs 30 mins)			
19/06/2026	Considered and directed the response to Campbells' position on the trial bundle index, including through the counsel-team amendments to the draft Index (Akash Sonecha 10:44 with suggested amendments) and Shelley White's 11:14 and 11:53 emails on strategy (whether to revert by Campbells' 10am deadline or write to the judge) (2 hrs 45 mins)			
19/06/2026	Advised on the substratum skeleton direction being sought from Asif J on Campbells' conduct on bundles and considered the position (Akash Sonecha 10:06/10:19 and Shelley White 10:19) on the joint email versus a direct approach to the judge (2 hrs)			
19/06/2026	Reviewed the further trial logistics correspondence and the Opus 2 arrangements (Laure-Astrid Wigglesworth 02:35 and Shelley White 02:54) (2 hrs)			
19/06/2026	Continued detailed preparation for the substantive substratum hearing, including further work on the speaking note and the underlying authorities on impossibility, impracticability and reasonable expectations (2 hrs)			
19/06/2026	Dealt with US-side matters, including the Apple Tree retention application and its interaction with the s.24(5)(j) position (1 hr 30 mins)			
20/06/2026	Reviewed Campbells' response on the bundle index (Becky Moseley 19:35 – "incredibly unhelpful", reinstating almost everything) and directed Akash and Anson on the counsel team's response, approving Akash's suggested draft email at 20:35 and confirmed by Anson at 20:54 (4 hrs 45 mins)			
20/06/2026	Continued detailed work on the substratum skeleton and speaking note, incorporating Walkers' initial reactions and identifying remaining points to be worked through with Shelley, Becky and Laure-Astrid (3 hrs 30 mins)			
20/06/2026	Reviewed the underlying loss-of-substratum authorities in light of the Rigmora evidence and the Delaware findings; refined the argument on the Chapter 11 rescue plan (2 hrs 30 mins)			
20/06/2026	Corresponded with Walkers on trial logistics, the US attorney position and the interaction with the 30 June/1 July hearing (1 hr 15 mins)			
21/06/2026	Deep work on the substratum skeleton and speaking note ahead of the hearing week, focussing on the treatment of the Delaware findings, the Chapter 11 restructuring and the funding runway argument (4 hrs 30 mins)			
21/06/2026	Reviewed further authorities on issue estoppel and abuse of process in the Chapter 11/Cayman context and their treatment in the skeleton and speaking note (3 hrs 15 mins)			
21/06/2026	Reviewed and directed drafts of the chronology and dramatis personae for the trial bundle (2 hrs 30 mins)			
21/06/2026	Prepared for the hearing week's tasks and coordinated with Akash, Anson and Walkers on the remaining drafting and evidence work (2 hrs 30 mins)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	**Brick Court Chambers No. 4 Account**	**Bank:**	**BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP**
Account Number:	**[redacted]1412**	**IBAN:**	**GB42 BARC 2000 0093 3814 12**
Sort Code:	**20-00-00**	**Swift Code:**	**BARCGB22**

Printed By: Collette Vanner - 3 July 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 03/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF686 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
22/06/2026	Reviewed and considered Walkers' comments and tracked changes on the substratum Skeleton and settled the counsel team's response to Walkers' substantive amendments (4 hrs 30 mins)			
22/06/2026	Reviewed further Walkers correspondence on the position of a US attorney at the loss-of-substratum trial (Shelley White 10:37) and the timezone/venue considerations, and coordinated the counsel team's response (3 hrs)			
22/06/2026	Continued substantive redrafting of the substratum skeleton, working through the Delaware materials and the Chapter 11 rescue plan analysis (3 hrs)			
22/06/2026	Directed Akash and Anson on the speaking note and the chronology/dramatis personae drafts, and reviewed successive iterations (2 hrs 15 mins)			
22/06/2026	Reviewed the underlying loss-of-substratum authorities and the Rigmora evidence in detail, cross-checking against the pleaded case and the Delaware findings (2 hrs 15 mins)			
23/06/2026	Reviewed the counsel team's amendments to the chronology and dramatis personae (Akash Sonecha 14:22 and 15:07 sending back to Walkers with comments) and directed Akash on the remaining points; considered Rebecca Moseley's 16:58 reply attaching the 11 May 2025 budget-allocation email and its treatment in the chronology (3 hrs 45 mins)			
23/06/2026	Reviewed Walkers' further comments on the substratum skeleton (Shelley White 10:12 point about the Rigmora bid proposal being provided on a WP basis and Eric's hope for a public release) and refined the skeleton and speaking note accordingly (3 hrs)			
23/06/2026	Continued detailed drafting and editing of the substratum skeleton, focussing on the loss-of-substratum test, the Chapter 11 rescue plan, the Braeburn position and the funding runway analysis (3 hrs 45 mins)			
23/06/2026	Directed Akash and Anson on the speaking note and reviewed further drafts of the chronology and dramatis personae (2 hrs 15 mins)			
23/06/2026	Reviewed further Delaware developments and correspondence, and prepared for the 24 June hearing (2 hrs 15 mins)			
24/06/2026	Attended to the 24 June Cayman hearing preparation and follow-up, including review of the trust and confidence points and the interaction with the substratum case (3 hrs)			
24/06/2026	Reviewed further comments on the substratum skeleton from Walkers (Rebecca Moseley 19:24 circulating the wider-group comments after finishing with the Delaware materials) and settled the counsel team's consolidated position (3 hrs)			
24/06/2026	Reviewed the position on the Apple Tree retention application in the Delaware bankruptcy court (Shelley White 20:07 confirming addition to the invitation, and the docket update) and its interaction with the Cayman timetable (2 hrs 15 mins)			
24/06/2026	Reviewed Rebecca Moseley's 23:57 email on the chronology with Campbells' amendments and gave directions on which to accept and which to press back on (2 hrs 15 mins)			
24/06/2026	Continued substantive drafting on the substratum skeleton and speaking note and directed the counsel team on the remaining work (2 hrs 15 mins)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	Brick Court Chambers No. 4 Account	**Bank:**	BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP
Account Number:	[redacted]1412	**IBAN:**	GB42 BARC 2000 0093 3814 12
Sort Code:	20-00-00	**Swift Code:**	BARCGB22

Printed By: Collette Vanner - 3 July 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 03/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF686 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
24/06/2026	Coordinated the US-attorney breakfast arrangement (Shelley White 23:46 confirming 7:30am at Seven) and the wider hearing-week logistics (2 hrs 15 mins)			
25/06/2026	Reviewed and directed the counsel team on Rebecca Moseley's 21:41 email on Campbells' "screed" over the Rigmora bid document being non-privileged and the interaction with Opus 2 upload; advised on the position to be taken (that we would not refer to the bid at trial if Shelley and Jan were content). (4 hrs 45 mins)			
25/06/2026	Reviewed Walkers' further work on the corrective affidavit position (Shelley White 19:07 on the transfer having occurred at the time the earlier affidavit was sworn) and directed the counsel team (3 hrs)			
25/06/2026	Continued substantive editing of the substratum skeleton and finalising the speaking note (3 hrs)			
25/06/2026	Reviewed further trial-bundle and correspondence issues with Campbells and coordinated the position on the trial preparation (3 hrs)			
25/06/2026	Prepared for departure to Cayman and coordinated final admission and logistical points with Walkers and clerks (3 hrs)			
26/06/2026	Reviewed Rebecca Moseley's 02:10 response on the Rigmora bid position with the alternative options to be sent back to Hugo Farmer of Campbells and settled the counsel team's reply (3 hrs)			
26/06/2026	Reviewed Walkers' forwarded proposed timetable for submissions (Laure-Astrid Wigglesworth 17:15 and 17:16 "Trial next week" correspondence with Campbells) and settled the counsel team's response (3 hrs)			
26/06/2026	Reviewed Rebecca Moseley's 21:28 note on issue estoppel research together with the summary of the Cayman position, and used it to refine the treatment of issue estoppel in the substratum skeleton and JPL speaking note (3 hrs)			
26/06/2026	Reviewed Izabella Arnold's 22:43 email on the L2/1, L2/4, L3/30 and L2/2 replacements from Campbells due to highlighting and other issues and considered the impact on the trial bundle (2 hrs 15 mins)			
26/06/2026	Attended final logistics and admission points and pre-hearing coordination with Walkers, Akash and Anson (2 hrs 15 mins)			
26/06/2026	Continued substantive work on the speaking note and finalised the counsel team's position on all remaining points (1 hr 30 mins)			
27/06/2026	Full-day preparation for the substratum trial, working through the final substratum skeleton, the JPL speaking note, the chronology and dramatis personae and the trial bundle (6 hrs)			
27/06/2026	Detailed re-reading of the loss-of-substratum authorities, the Delaware findings and the Rigmora evidence to prepare for the oral submissions on Day 1 (30 June) (4 hrs 30 mins)			
27/06/2026	Considered anticipated arguments and cross-arguments from Campbells and prepared responsive points, and coordinated with Akash and Anson (3 hrs)			
27/06/2026	Travel and logistics to Cayman for the hearing week; final coordination with Walkers (1 hr 30 mins)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	**Brick Court Chambers No. 4 Account**	**Bank:**	**BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP**
Account Number:	**[redacted]1412**	**IBAN:**	**GB42 BARC 2000 0093 3814 12**
Sort Code:	**20-00-00**	**Swift Code:**	**BARCGB22**

Printed By: Collette Vanner - 3 July 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 03/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF686 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
28/06/2026	Continued full-day preparation for the substratum trial in Cayman, working through the final draft of the speaking note, the substratum skeleton and the trial bundle materials (5 hrs 30 mins)			
28/06/2026	Deep reading of the loss-of-substratum authorities and Delaware materials, focussing on issue estoppel and the Chapter 11 rescue plan analysis; refined arguments on the reasonable-expectations and purpose-clause points (4 hrs 15 mins)			
28/06/2026	Coordinated with Walkers, Akash and Anson on final hearing logistics, the JPL summons position and the interaction with the substratum trial timetable (2 hrs 45 mins)			
28/06/2026	Reviewed the trial bundle and Opus 2 arrangements ahead of the hearing (1 hr 30 mins)			
29/06/2026	Reviewed Anson Cheung's and Akash Sonecha's drafts of the JPL/Bundle Speaking Note and the issue estoppel note; approved the "short short" answer structure for paragraph 2 and directed removal of numbering in the attached speaking note (Akash Sonecha 17:36). (3 hrs 45 mins)			
29/06/2026	Reviewed Akash's further note on issue estoppel (18:06) reflecting Becky's comments and directed the final position on paragraphs 33 and 87 (3 hrs 45 mins)			
29/06/2026	Reviewed Jan Golaszewski's 19:58 initial questions on the trust and confidence points at paragraph 14 of the note and coordinated the counsel team's response (3 hrs)			
29/06/2026	Attended final pre-hearing coordination with Walkers, including Laure-Astrid Wigglesworth's 21:33 email confirming the 9am car and hearing arrangements (2 hrs 15 mins)			
29/06/2026	Coordinated the team lunch and social/travel arrangements with Jan Golaszewski and the wider team for after the hearing (20:46, 20:52, 21:27 and 21:33 exchanges). (2 hrs 15 mins)			
30/06/2026	Brief on Substratum trial (first day - included in brief fee)			
30/06/2026	Early-morning preparation from 05:00 UK time onwards, including review of Laure-Astrid Wigglesworth's 02:34 email clarifying the position on the trust and confidence points raised the previous night, Rebecca Moseley's 03:58 further comments on the speaking note and Akash Sonecha's 11:25 further turn of the note (2 hrs 15 mins)			
30/06/2026	Reviewed Akash Sonecha's 11:48 correction on the Third Funding Motion cash-on-hand figure, and his 12:58 short summary of the new documents circulated (2 hrs 15 mins)			
30/06/2026	Reviewed Anson Cheung's 13:32 and 13:41 JPL note and highlighted points; and Rebecca Moseley's 13:49 email on the composition of the $66m figure and Chapter 11 expenses (2 hrs 15 mins)			
30/06/2026	Appeared before Justice Asif KC on Day 1 of the loss-of-substratum trial in FSD 151 of 2025 (JAJ) from approximately 10:00 to 16:30 Cayman time, opening the case on loss of substratum, dealing with the Delaware materials and the Chapter 11 rescue plan analysis, and responding on the JPL summons and issue-estoppel points; documents on screen were coordinated through Izabella Arnold with Cara at Opus 2 (14:56/14:57 exchange).(4 hrs 45 mins)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	**Brick Court Chambers No. 4 Account**	**Bank:**	**BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP**
Account Number:	**[redacted]1412**	**IBAN:**	**GB42 BARC 2000 0093 3814 12**
Sort Code:	**20-00-00**	**Swift Code:**	**BARCGB22**

Printed By: Collette Vanner - 3 July 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 03/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF686 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
30/06/2026	Post-hearing conference with Walkers and the counsel team, including review of Jan Golaszewski's 16:11 and 16:26 emails on the FN 55 quote and the QE/Potter Anderson coordination, and Izabella Arnold's 16:55 and 20:12 emails on the paragraph 52 quote and the client/US counsel reactions to whether the criticism was directed to Rigmora rather than the Judge (2 hrs 15 mins)			
30/06/2026	Reviewed Izabella Arnold's 21:14 further comments from QE (Patty Tomasco) over the course of the Petitioners' submissions and Rebecca Moseley's 22:33 note on the new hearing entry on the Court portal (FSD2025-0151, due date 3 July 2026), and Anson Cheung's 23:41 and 23:49 JPL note and Cayman ELP legal-personality point (1 hr 30 mins)			
01/07/2026	Early-morning preparation from 05:00 UK time onwards, including Rebecca Moseley's 00:30 note on when "officeholders" was first raised and Akash Sonecha's 00:46 updated speaking note with responsive points reflecting Asif J's indicated interests, and 00:52 and 00:58 exchanges on s.24(5)(j) and the point-by-point format (2 hrs 15 mins)			
01/07/2026	Reviewed Izabella Arnold's 01:58 email on the Realtime page availability and Opus 2 recipient list, Rebecca Moseley's 02:10 further points on figures in the speaking note, Izabella Arnold's 02:47 email on the Trial Bundle Upload correspondence at Bundle I and Laure-Astrid Wigglesworth's 03:59 email on the ELP Act s.35 point and the substitution of LPs argument (2 hrs 15 mins)			
01/07/2026	Reviewed the Day 1 transcript circulated by Laure-Astrid Wigglesworth at 04:02 and used it to refine the Day 2 arguments and the responses to the Petitioners' submissions (2 hrs 20 mins)			
01/07/2026	Reviewed Rebecca Moseley's 05:08 further comments on the responsive speaking note, Akash Sonecha's 10:22 revised draft focussed on cutting unnecessary points, and Anson Cheung's 11:13, 12:18 and 12:20 tracked-changes iterations and Opus upload requests (2 hrs 15 mins)			
01/07/2026	Appeared before Justice Asif KC on Day 2 of the loss-of-substratum trial from approximately 10:00 to 16:30 Cayman time, responding to the Petitioners' submissions, dealing with the JPL summons and the ELP legal-personality point, and taking the Court through the further Delaware materials and the QE/Potter Anderson responses on timing and bad faith (LA Wigglesworth 18:22 and Becky Moseley 18:29 summarising QE input, Motion to Dismiss and Motion for Relief from Stay materials). (4 hrs)			
01/07/2026	Post-hearing conference with Walkers, Jan Golaszewski, and the counsel team; Rebecca Moseley's 12:32 and 12:40 responses on the ELP provisions and Opus uploads; coordinated final position and next-day debrief (2 hrs 30 mins)			
02/07/2026	Stage four of agreed fee	£300,000.00	0%	£0.00

VAT SUMMARY
0% (FEE) Amount: £300,000.00, VAT: £0.00

Sub Total	£300,000.00
Total VAT	£0.00
Total	£300,000.00

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name: Brick Court Chambers No. 4 Account
Account Number: [redacted]1412
Sort Code: 20-00-00
Bank: BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP
IBAN: GB42 BARC 2000 0093 3814 12
Swift Code: BARCGB22

Printed By: Collette Vanner - 3 July 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

7-8 Essex Street
London
WC2R 3LD
DX: LDE 302

Tel: 020 7379 3550
Fax: 020 7379 3558
Email: fees@brickcourt.co.uk

Miss Shelley White,
Walkers,
190 Elgin Avenue,
George Town,
Grand Cayman,
KY1-9001,
Cayman Islands

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 22/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF697 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
03/07/2026	Reviewed and consolidated the Day 1 and Day 2 hearing transcripts (finalised Day 2 having come in from Opus 2 the previous night) and the counsel-team notes of Justice Asif KC's indications on the substratum, JPL and officeholder points, to identify next steps and any further evidence, submissions or applications that might be needed post-hearing. (2 hrs 45 mins)			
03/07/2026	Considered with Akash and Anson the scope of the further evidence required for the trust and confidence trial, in particular whether ATP had a further round of evidence to serve and the interaction with the timetable set by paragraph 15 of the directions order (1 hr 45 mins)			
03/07/2026	Convened a counsel-team call with Akash and Anson to work through the position on TC-trial evidence, the sequencing of the December 2025 evidence and reply evidence, and next steps to be taken with Walkers (1 hr 45 mins)			
03/07/2026	Reviewed and settled the counsel-team position on the ATP Life Science Ventures Day 2 (01/07/2026) follow-up correspondence with Walkers, and joined the resulting post-hearing debrief call with Walkers(1 hr 15 mins)			
03/07/2026	Corresponded with Walkers on the new Court portal hearing entry (FSD2025-0151 due date 3 July 2026), Rebecca Moseley's outstanding queries from the hearing and the interaction with the Delaware Chapter 11 timetable (1 hr 15 mins)			
04/07/2026	General preparation for the trust and confidence trial, focussing on the pleaded issues, the evidence served to date and the further evidence to be marshalled by ATP; considered the areas in which Reply evidence would be required and how those areas mapped onto the Cayman substratum ruling awaited from Justice Asif KC. (3 hr 45 mins)			
04/07/2026	Reviewed the witness statements served in December 2025 with a view to identifying gaps and points requiring further explanation, and considered the topics on which cross-examination would be most productive (2 hrs 15 mins)			
04/07/2026	Reviewed the Delaware Chapter 11 materials most closely bearing on the TC issues and considered the interaction between the Delaware and Cayman timetables (1 hr 30 mins)			
05/07/2026	Continued preparation for the trust and confidence trial, working through the outline of ATP's case on the trust and confidence issues and refining the working list of themes and factual points to be developed at trial (3 hrs 30 mins)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	**Brick Court Chambers No. 4 Account**	**Bank:**	**BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP**
Account Number:	**[redacted]1412**	**IBAN:**	**GB42 BARC 2000 0093 3814 12**
Sort Code:	**20-00-00**	**Swift Code:**	**BARCGB22**

Printed By: Collette Vanner 22 July 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 22/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF697 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
05/07/2026	Considered the areas in which expert evidence or further factual evidence would be required and prepared a working note on evidence gaps for discussion with the counsel team and Walkers in the coming week(2 hrs 15 mins)			
05/07/2026	Considered the Rigmora skeleton and the authorities cited by Rigmora on trust and confidence, and began mapping the counter-arguments to be developed in ATP's Reply (2 hrs)			
06/07/2026	Full working day on the trust and confidence trial: continued substantive preparation of ATP's case, including the outline of the opening submissions and the structure of cross-examination of the Rigmora witnesses (3 hrs 45 mins)			
06/07/2026	Reviewed and considered the counsel-team's working papers on trust and confidence, and consolidated a working list of issues to be finalised with the counsel team the following day(2 hrs 30 mins)			
06/07/2026	Reviewed the interaction between the trust and confidence trial and the officeholder points indicated by Justice Asif KC at the substratum hearing, and considered the practical impact of a positive substratum ruling on the shape of the TC trial (2 hrs)			
06/07/2026	Attended to correspondence with Walkers on the FSD 151 of 2025 (JAJ) trial bundle and hearing arrangements, and coordinated internal work streams with Akash and Anson for the coming week (2 hrs)			
07/07/2026	Reviewed the developing correspondence on the FSD 151 of 2025 (JAJ) trial bundle and hearing arrangements and joined the ATP Pre-Call with Walkers and Counsel arranged by Laure-Astrid Wigglesworth to coordinate positions ahead of the post-hearing conference (2 hrs) 45 mins)			
07/07/2026	Attended the ATP Post-call catch-up arranged by Rebecca Moseley to take stock following the pre-call, discussing responses to Justice Asif KC's indications and how best to structure the counsel team's ongoing input (2 hrs 15 mins)			
07/07/2026	Considered and approved with the counsel team the first draft of the list of issues for the trust and confidence trial (prepared by Akash and reviewed by Anson), and gave directions on circulating the list of issues to Walkers with a view to focussing the outstanding work (1 hr 45 mins)			
07/07/2026	Corresponded with Laure-Astrid Wigglesworth on timing and Zoom logistics for the evening call and coordinated internal availability. Prep for call (1 hrs 15 mins)			
07/07/2026	Reviewed further correspondence on the trial bundle and hearing arrangements, considered the Cayman/Delaware interaction and directed Akash and Anson on the emerging workstreams.(1 hr)			
08/07/2026	Attended to ATP correspondence: consulted with Anson on where matters stood, explaining that no decisions had yet been made and that much would turn on the proposal expected from Campbells (1 hr 30 mins)			
08/07/2026	Reviewed the draft order and email from Campbells on the TC trial and formed my preliminary views for the counsel team, flagging in particular the concern that any order should not have unintended extra-territorial effect, and that the counsel team's response would be affected by the position on the appeal (1 hr 30 mins)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	**Brick Court Chambers No. 4 Account**	**Bank:**	**BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP**
Account Number:	**[redacted]1412**	**IBAN:**	**GB42 BARC 2000 0093 3814 12**
Sort Code:	**20-00-00**	**Swift Code:**	**BARCGB22**

Printed By: Collette Vanner - 22 July 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 22/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF697 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
08/07/2026	Considered Akash's confirmation that he shared my preliminary views and would provide more detailed thoughts and comments on the order in the morning, and directed further work overnight (45 mins)			
08/07/2026	Coordinated internally on the interaction between the Campbells proposal and the pending Cayman appeal, and the practical impact on the counsel team's ongoing tasks (30 mins)			
09/07/2026	Convened a morning call with Akash to work through the Campbells draft order, the extra-territorial-effect concern and the counsel team's consolidated response (1 hr 45 mins)			
09/07/2026	Directed and reviewed successive iterations of the proposed joint communication to the Cayman Court on the trial bundle and hearing arrangements, including the counsel-team amendments on the reservation of costs and the treatment of assisting further, and the interaction with the Delaware Chapter 11 proceedings (3 hrs)			
09/07/2026	Considered Eric Winston's (Quinn Emanuel) emails on deleting the costs reservation on the ground that any order of a non-bankruptcy court concerning the reservation of a prepetition claim implicated the automatic stay; coordinated the counsel-team position with Jan Golaszewski and settled the final wording pushed back to Eric (2 hrs 30 mins)			
09/07/2026	Reviewed and directed the counsel team's response on Rebecca Moseley's draft explaining to the Cayman Judge that the costs reservation had been removed for automatic-stay reasons, and settled Rebecca's final email to the Court (1 hr 45 mins)			
09/07/2026	Reviewed Akash Sonecha's comments on the draft joint communication (the Delaware Order reference and the typo point) and consolidated the counsel-team position; Anson Cheung sign-off; coordinated with clients (Daniel P. Finkelman confirming his assent). (1 hr 15 mins)			
09/07/2026	Reviewed the developing position on the "Idea for incoming Cayman officeholders" thread (Kathy Good) and considered the possible interaction with the Cayman officeholder issues raised at the substratum trial (1 hr 15 mins)			
09/07/2026	Considered with Akash the position on the timing of the appeal in light of Seth Harrison's comments and confirmed that the appeal should be kept alive for at least a few weeks; directed Akash and Anson to keep on top of the ongoing correspondence on the order (30 mins)			
10/07/2026	Considered the counsel team's further analysis of the Campbells proposed order (Akash and Anson having discussed the order between themselves) and the practical implications for the Cayman timetable. (1 hr 15 mins)			
10/07/2026	Reviewed the draft order circulated by Campbells vacating the trust and confidence trial, together with Walkers' initial views; considered the position on whether ATP should agree to vacate the trust and confidence trial or reserve on the point in light of the officeholder issues indicated by Justice Asif KC (3 hr 30 mins)			
10/07/2026	Advised on the counsel-team position, including the tactical position on how the reply to Campbells should be worded to make ATP's position clear without giving further ammunition to Rigmora or antagonising the Judge (2 hrs 15 mins)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	**Brick Court Chambers No. 4 Account**	**Bank:**	**BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP**
Account Number:	**[redacted]1412**	**IBAN:**	**GB42 BARC 2000 0093 3814 12**
Sort Code:	**20-00-00**	**Swift Code:**	**BARCGB22**

Printed By: Collette Vanner - 22 July 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 22/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF697 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
10/07/2026	Reviewed Seth Harrison's email and coordinated the counsel-team position with Walkers (1 hr 45 mins)			
10/07/2026	Reviewed Kathy Good's (Potter Anderson) email on the incoming Cayman officeholders and her preliminary view that Walkers may respond that they had not had time to diligence positions by the 22 July date, and considered the interaction with the Delaware timetable (30 mins)			
10/07/2026	Corresponded with Rebecca Moseley on the evening Zoom logistics, joined the resulting call with Walkers and settled next steps on the trial bundle and the incoming officeholder work (30 mins)			
11/07/2026	Engaged with Anson on where the case now stood following the correspondence with Campbells and Walkers, the possible mentions hearing on 29 July and how the counsel team's workstreams should be adjusted (1 hr 30 mins)			
11/07/2026	Considered the fees position and reviewed the latest email from Rebecca Moseley in that light (1 hr)			
11/07/2026	Considered the interaction with the developing officeholder position and the Delaware timetable ahead of the coming week (30 mins)			
12/07/2026	Reviewed Akash Sonecha's email on the "rules of the road" — Akash and Anson's shared view that Justice Asif KC's order (in the stead of and to the exclusion of ATP III GP Ltd) might extend to agents of the general partner, potentially including the CRO appointed — and considered the practical implications for the counsel team, the general partner and the incoming officeholders (2 hrs 45 mins)			
12/07/2026	Reviewed Eric Winston's (Quinn Emanuel) "Draft communication to A&M office holders" and began mapping the Cayman-side points to be pressed in comments (1 hr 15 mins)			
12/07/2026	Corresponded internally with the counsel team on the Sunday planning for the coming week and directed Akash and Anson on the "rules of the road" advice and the A&M draft communication (1 hr)			
13/07/2026	Convened a short counsel-team catch-up call to take stock of the current status of the engagement and the immediate next steps on the officeholder communication and the trial-bundle correspondence (1 hr)			
13/07/2026	Reviewed Akash Sonecha's point on the risk that referring to Quinn Emanuel as "counsel for the debtors in possession" might be criticised by Rigmora LPs, having regard to Campbells' email of 9 July 2026 to the Court, and considered the counsel-team position on that risk. (2 hrs 15 mins)			
13/07/2026	Reviewed and directed the counsel team's consolidated Cayman-side comments on Eric Winston's draft communication to A&M officeholders (Patty Tomasco (Quinn Emanuel) having produced a revised draft), including the position on the fourth bullet point (the Cayman Order having replaced ATP III GP as general partner meaning that the first sentence of the fourth bullet fell to be deleted); confirmed the counsel-team's only comment on Patty's revised draft (2 hrs 45 mins)			
13/07/2026	Reviewed and settled Akash Sonecha's email on Quinn Emanuel's thinking on the "counsel for the debtors in possession" characterisation (1 hr 45 mins)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	**Brick Court Chambers No. 4 Account**	**Bank:**	**BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP**
Account Number:	**[redacted]1412**	**IBAN:**	**GB42 BARC 2000 0093 3814 12**
Sort Code:	**20-00-00**	**Swift Code:**	**BARCGB22**

Printed By: Collette Vanner - 22 July 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 22/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF697 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
13/07/2026	Reviewed the further correspondence on the FSD 151 of 2025 (JAJ) trial bundle (Rebecca Moseley's forward of the Court version), confirmed that the amendments were essentially stylistic and confirmed the counsel team's position with Akash and Anson (1 hrs 45 mins)			
13/07/2026	Reviewed the position on Walkers' confirmation to the Cayman Court that no further comments were required and coordinated with Rebecca Moseley on the timing of that confirmation (1 hr)			
13/07/2026	Continued preparation on the officeholder motion, particularly on the interaction with the Cayman substratum order and the possible parallels with the Rigmora LPs' skeleton (30 mins)			
14/07/2026	Reviewed the A&M officeholder motion (attached to Rebecca Moseley's email), and considered the counsel-team's initial reactions to the relief sought, the timetable and the interaction with the Chapter 11 cases and the pending Cayman substratum ruling (3 hrs)			
14/07/2026	Reviewed Rebecca Moseley's email opening the "Preparing an objection to the officeholder motion" workstream and coordinated the counsel-team task allocation on drafting the objection to the officeholder motion (2 hrs 30 mins)			
14/07/2026	Reviewed and dealt with Rebecca Moseley's "rules of the road" query from Dan Finkelman relating to PortCo directors hiring senior management of a PortCo within the boundaries of their existing powers, and Rebecca's tentative view; confirmed my agreement and instructed Akash and Anson accordingly (2 hrs 30 mins)			
14/07/2026	Reviewed Anson Cheung's response — agreeing with Becky that if the Series A directors were directors of the PortCo, and derived their authority and powers solely by reason of that appointment, the position was tenable — and coordinated the counsel-team position for onwards transmission (1 hr 45 mins)			
14/07/2026	Reviewed Shelley White's out-of-office note confirming her return on 15 July and her direction of urgent matters not otherwise copied, and adjusted the coordination plan accordingly (1 hr 15 mins)			
14/07/2026	Continued early substantive work on the outline of the objection to the officeholder motion (the English-law analysis, and whether there is any equivalent to Cayman s.104(2) / s.95(3)(a) in the Insolvency Act 1986), and coordinated with Akash and Anson on research directions (1 hr 15 mins)			
15/07/2026	Continued substantive work on the objection to the A&M officeholder motion, focussing on the Cayman s.104(2) and s.95(3)(a) powers and the absence of any true English-law equivalent, on Palmer's Company Law §15.801 on the judicial factor jurisdiction, and on distinguishing the Ablyazov line of authority (interim manager for a narrow purpose). (3 hrs)			
15/07/2026	Reviewed Rebecca Moseley's email on the counsel-team's queries in from Eric Winston, including the Cayman-side answer on the absence of Cayman examples and the direction of travel, and her further note that Rigmora's skeleton referred to English authorities on receivers and managers which she would refresh her memory of; coordinated the counsel-team position on the English authorities to be considered (2 hrs 30 mins)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	**Brick Court Chambers No. 4 Account**	**Bank:**	**BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP**
Account Number:	**[redacted]1412**	**IBAN:**	**GB42 BARC 2000 0093 3814 12**
Sort Code:	**20-00-00**	**Swift Code:**	**BARCGB22**

Printed By: Collette Vanner - 22 July 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 22/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF697 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
15/07/2026	Reviewed and directed the counsel team's note in progress on the objection to the officeholder motion, including the treatment of the Petitioners' Skeleton Argument dated 25 June 2026 and the interaction with the substratum evidence (1 hrs 45 mins)			
15/07/2026	Reviewed Brett Haywood's (Potter Anderson) email on the Apple Tree Retention Application (Rigmora having filed a limited objection to the new KC retention on the ground that counsel should not receive pre-approval of a flat fee under section 328(a) of the bankruptcy code but rather be subject to section 330 review) and considered the counsel-team position on how to respond, coordinating with Walkers on the appropriate approach. (1 hrs 45 mins)			
15/07/2026	Engaged with the counsel team on Potter Anderson's fees email, taking the point that the whole purpose of applying as we had was to avoid the reasonableness debate; Anson shared the counsel team's uncertainty as to whether Potter Anderson were recommending a particular route or why. Directed the counsel team on the tactical position going into the Apple Tree Retention Application. (1 hrs 45 mins)			
15/07/2026	Continued preparation for the Apple Tree Retention Application argument and the interaction with the wider question of the treatment of professional fees post-appointment of the officeholders (1 hrs 15 mins)			
16/07/2026	Stage five of agreed fee	£150,000.00	0%	£0.00
16/07/2026	Reviewed Anson Cheung's detailed English-law note on the Cayman officeholder motion (with a minor red-mark amendment) — no IA 1986 equivalent to Cayman s.105(1)/s.106 CA; Official Receiver ? liquidator under s.136(2)-(3); Palmer's Company Law §15.801 reference on the judicial factor jurisdiction; distinguishing Ablyazov (interim manager for narrow purpose) — and coordinated the counsel-team position; directed Akash and Anson on the next iteration of the objection (2 hrs 30 mins)			
16/07/2026	Reviewed Brett Haywood's (Potter Anderson) escalating correspondence on the Apple Tree Retention Application (his view that the flat-fee structure was always a risk, and his subsequent explanations of the section 328(a) v Option B fee-application approach), and Kathy Good's (Potter Anderson) email explaining the difference between section 328(a) review and section 330 review.(4 hrs)			
16/07/2026	Drafted and sent the substantive counsel-team position on the Apple Tree Retention Application, setting out the four principal points on direct market comparators, KC self-employment and the flat-fee/brief-fee rationale, the extent to which the flat fee is not worked out purely on hours, and the analogy to an investment bank and a success fee; confirmed that the counsel team should stick with the original plan and go with Option A, since any other option would mean fighting on Rigmora's territory and treating the flat fee as if it were an hourly rate structure (2 hrs)			
16/07/2026	Consolidated the counsel-team responses on the Apple Tree Retention Application: Shelley White endorsing the approach; Akash Sonecha agreeing with the approach, drawing on paragraphs 25 and 26 of the retention motion and adding that Rigmora's objection ignored that the fees were earned in tranches so that any subsequent tranches would not be incurred if the proceedings fell away, making the fees in that sense contingent; and Anson Cheung's endorsement (1 hr 15 mins)			

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name:	Brick Court Chambers No. 4 Account	**Bank:**	BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP
Account Number:	[redacted]1412	**IBAN:**	GB42 BARC 2000 0093 3814 12
Sort Code:	20-00-00	**Swift Code:**	BARCGB22

Printed By: Collette Vanner - 22 July 2026

Professional fees of
Mr Vernon Flynn KC

VAT Registration Number: 564375226
Bar Council Number:

BRICK COURT CHAMBERS

Please quote case reference number on all correspondence

THIS IS NOT A TAX INVOICE

Date: 22/07/2026 **Case Ref No:** 117598 **Solicitor Ref No:** Shelley White

Invoice No: INVVF697 **Purchase Order No:**

Court: Cayman Islands **Court Ref:**

Case Name: ATP III LIMITED/DR SETH L HARRISON -V- UNICORN BIOTECH VENTURES ONE LTD & ORS

Date	Description	Amount	VAT%	VAT
16/07/2026	Reviewed Rebecca Moseley's query on whether, if Rigmora were permitted the section 330 review, Counsel would have to file fee applications with the same level of time-entry detail on their invoices as US attorneys; and Shelley White's note that it would be very unfair to end up in that position after Counsel's fees had been incurred, and that the counsel team took the view that the fee arrangements were entirely justified; refined the counsel-team position accordingly (1 hr 15 mins)			
16/07/2026	Reviewed Kathy Good's email on the newly appointed officeholders' request to adjourn the retention application and the funding application (a request to adjourn for a full month being unlikely to be palatable but a shorter adjournment potentially acceptable, particularly if we were agreeing to adjourn funding or their recognition motion by a brief period), and considered the counsel-team position on the proposed adjournment (1 hr 15 mins)			
16/07/2026	Continued preparation on the objection to the officeholder motion in parallel with the Apple Tree Retention Application workstream, and consulted with the counsel team on the tactical position: Akash took the view that Rigmora's objections could not have been unforeseen and that the counsel team should proceed with the plan proposed by Potter Anderson to argue for pre-approval of the flat fee at the 22 July hearing; my instinct was to proceed as planned (45 mins)			
17/07/2026	Continued work on the objection to the officeholder motion and on the counsel-team consolidation of the position, including on the proposed brief adjournment of the Apple Tree Retention Application; reviewed subsequent overnight correspondence from the US team (1 hr 45 mins)			
17/07/2026	Reviewed the Cayman Grand Court judicial notifications received overnight, including [2026] CIGC (FSD) 58 (Segal J) Abraaj SPV 108 Limited and another v KE Holdings Limited — Further Discovery Judgment (17 July 2026) and [2026] CIGC (FSD) 50 (Ramsay-Hale CJ) Four Seasons Hotels Ltd et al v ProCro Acquisitions Limited — Reasons for Decision (26 June 2026), and considered whether any of the reasoning bore on the ATP substratum ruling awaited from Justice Asif KC (1 hr 15 mins)			
17/07/2026	Attended to correspondence with Walkers on next steps, the officeholder motion and the interaction with the Chapter 11 hearing on 22 July (1 hr)			
17/07/2026	Coordinated with Akash and Anson on remaining tasks (30 mins)			

VAT SUMMARY
0% (FEE) Amount: £150,000.00, VAT: £0.00

Sub Total	£150,000.00
Total VAT	£0.00
Total	£150,000.00

Please make cheques payable to Mr Vernon Flynn KC

****PLEASE SEND REMITTANCE ADVICE TO FEES@BRICKCOURT.CO.UK AND QUOTE CASE REFERENCE NUMBER ON ALL BACS PAYMENTS****

Account Name: Brick Court Chambers No. 4 Account
Account Number: [redacted]1412
Sort Code: 20-00-00
Bank: BARCLAYS BANK, 1 CHURCHILL PLACE, LONDON, E14 5HP
IBAN: GB42 BARC 2000 0093 3814 12
Swift Code: BARCGB22

Printed By: Collette Vanner - 22 July 2026

ESSEX COURT CHAMBERS
BARRISTERS
Regulated by the Bar Standards Board

Walkers (Cayman) LLP
190 Elgin Avenue
George Town
Grand Cayman
KY1-9001
Cayman Islands

Invoice for:

Mr Akash Sonecha

VAT Reg No: **GB 355130229**
Date: **15/06/2026**
Page: **1 of 1**

Solicitor's Ref: **SW**

Our Ref: **115107**

Purchase Order No:

Invoice No: **INVAS208**

GP OF ATP LIFE SCIENCE VENTURES L.P - V - (1) UNICORN BIOTECH VENTURES ONE LTD (2) UNICORN BIOTECH VENTURES TWO LTD

EC Country:

EC VAT Reg:

Date	Description	Amount	Vat%	Vat
01/06/2026	Brief on Hearing - 1st stage	£112,500.00	0%	£0.00
15/06/2026	Brief on Hearing - 2nd stage	£112,500.00	0%	£0.00

VAT SUMMARY 0% (FEE) Amount: £225,000.00, VAT: £0.00		
	Total Fees	**£225,000.00**
	Total VAT	**£0.00**
	Total Due	**£225,000.00**

Please notify us of bank transfers by email at: accounts@essexcourt.net

****IN ORDER TO CORRECTLY ALLOCATE THE PAYMENT, PLEASE INCLUDE EITHER OUR CASE REFERENCE OR INVOICE NUMBER AND BARRISTER INITIALS IN THE TRANSFER DETAILS****

BANK DETAILS:

Account Name:	**Comcas Services Ltd Essex Court Chambers Central**	Bank Name:	**Natwest**
Account No:	**[redacted]1570**	Sort Code:	**60-80-08**
Swift/BIC No:	**NWBKGB2L**	IBAN:	**GB40 NWBK 6080 0861 5515 70**

PLEASE QUOTE OUR REFERENCE NO. ON ALL CORRESPONDENCE ** VALID ONLY WHEN RECEIPTED - THIS IS NOT A TAX INVOICE **
Printed on 04/09/2026 by: Sabrina Karikari

ESSEX COURT CHAMBERS
BARRISTERS
Regulated by the Bar Standards Board

Walkers (Cayman) LLP
190 Elgin Avenue
George Town
KY1-9001
Grand Cayman,

Invoice for:

Mr Akash Sonecha

VAT Reg No: **GB 355130229**
Date: **13/07/2026**
Page: **1 of 1**

Solicitor's Ref: **SW**

Our Ref: **115107**

Purchase Order No:

Invoice No: **INVAS222**

GP OF ATP LIFE SCIENCE VENTURES L.P - V - (1) UNICORN BIOTECH VENTURES ONE LTD (2) UNICORN BIOTECH VENTURES TWO LTD

EC Country:

EC VAT Reg:

Date	Description	Amount	Vat%	Vat
02/07/2026	Brief on Hearing - 3rd stage	£112,500.00	0%	£0.00

VAT SUMMARY
0% (FEE) Amount: £112,500.00, VAT: £0.00

Total Fees	**£112,500.00**
Total VAT	**£0.00**
Total Due	**£112,500.00**

Please notify us of bank transfers by email at: accounts@essexcourt.net

****IN ORDER TO CORRECTLY ALLOCATE THE PAYMENT, PLEASE INCLUDE EITHER OUR CASE REFERENCE OR INVOICE NUMBER AND BARRISTER INITIALS IN THE TRANSFER DETAILS****

BANK DETAILS:

Account Name:	**Comcas Services Ltd Essex Court Chambers Central**	Bank Name:	**Natwest**
Account No:	**[redacted]1570**	Sort Code:	**60-80-08**
Swift/BIC No:	**NWBKGB2L**	IBAN:	**GB40 NWBK 6080 0861 5515 70**

PLEASE QUOTE OUR REFERENCE NO. ON ALL CORRESPONDENCE ** VALID ONLY WHEN RECEIPTED - THIS IS NOT A TAX INVOICE **
Printed on 04/09/2026 by: Kevin Grubb

4 NEW SQUARE
CHAMBERS

Please note we cannot accept payment from anyone other than the instructing solicitors or contracted client without prior written arrangement.

Walkers
190 Elgin Avenue
George Town
Grand Cayman
KY1-9001
Cayman Islands
Attention: Ms Shelley White

Professional Fees of:
Ms Anson Cheung
VAT Registration No: GB376 4549 57

THIS IS NOT A TAX INVOICE

Date: 18/08/2026 Case Ref No: 208060 Solicitor Ref No: .

Case Name: **ATP III GP, Ltd, ATP Life Science Ventures L.P AND Unicorn Biotech Ventures One Ltd and Unicorn Biotech Ventures Two Ltd**

Date	Description	Amount	Vat%	Vat
04/06/2026	* Fixed Fee - 1st Tranche	£112,500.00	0%	£0.00
18/06/2026	* Fixed Fee - 2nd Tranche	£112,500.00	0%	£0.00
02/07/2026	* Fixed Fee - 3rd Tranche	£112,500.00	0%	£0.00
15/07/2026	* Fixed Fee - 4th Tranche	£112,500.00	0%	£0.00

** indicates a previously unbilled item*

VAT SUMMARY		
0% (FEE) Amount: £450,000.00, VAT: £0.00	**Total Fees**	**£450,000.00**
	Total VAT	**£0.00**
	Total Due	**£450,000.00**

Payee Name: Four New Square **Account Number: [redacted]1348** **Sort Code: 18 00 02**
Bank: Coutts **SWIFT: COUTGB22** **IBAN: GB30COUT18000208931348**

Paying by BACs
Please include case ref: 208060 and inform remittances@4newsquare.com of any payments made. Could you also use this address for copy tax invoices and any queries please.
Please make cheques payable to Ms Anson Cheung.

Previously rendered on 18/08/2026

Please Quote Case Reference on all Correspondence

Printed on 18/08/2026 by: Andrew Call

BARRISTERS REGULATED BY THE BAR STANDARDS BOARD.
4 NEW SQUARE CHAMBERS, LINCOLN'S INN, LONDON WC2A 3RJ +44 (0) 20 7822 2000 4NEWSQUARE.COM

EXHIBIT E

EXPENSES

May 14, 2026 through August 3, 2026

Certificate of Good Standing

Description	Amount
Required for Vernon Flynn KC work permit.	$47.52

Police Certificate

Description	Amount
Required for Vernon Flynn KC work permit.	$165.00

Flights

Description	Amount
Flight No. AA1300 Business Class 06/21/2026	$529.45

Hotel

Description	Amount
Kompose Boutique Hotel Miami 06/20/2026 to 06/21/2026	$277.85

Flights

Description	Amount
Flight No. BA0209 06/20/2026; Flight No. BA0252 08/04/2026	$5,807.99