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

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

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

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

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number include: Apple Tree Life Sciences, Inc. (4506); ATP Life Science Ventures, L.P. (8224); ATP III GP, Ltd. (6091); Apertor Pharmaceuticals, Inc. (3161); Initial Therapeutics, Inc. (2453); Marlinspike Therapeutics, Inc. (4757); Red Queen Therapeutics, Inc. (8563); Evercrisp Biosciences, Inc. (4437); Nine Square Therapeutics, Inc. (4503); and Nereid Therapeutics, Inc. (8493). The location of the Debtors' service address in these chapter 11 cases is 230 Park Avenue, Suite 2800, New York, NY 10169.

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

1. On May 8, 2026, the Appellants filed the *Notice of Appeal* [Bankr. Dkt. No. 634] in the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court"), appealing the *Order (I) Authorizing Use of Funds to (A) Fund Portfolio Companies, (B) Pay Management Company Expenses and (C) Pay Chapter 11 Expenses, and (II) Granting Related Relief* [Docket No. 583] (the "Funding Order")[2] entered by the Bankruptcy Court on April 24, 2026, thereby commencing the instant bankruptcy appeal (the "Bankruptcy Appeal").

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

3. On July 10, 2026, the Honorable Justice Jalil Asif, Judge of the Grand Court of the Cayman Islands (the "Cayman Court"), appointed Alexander Lawson and Barry Lynch as joint officeholders (the "Officeholders") "to act in the stead of and to the exclusion of" ATP III GP Ltd as general partner of the Fund with power and authority to act in relation to the affairs of the Fund

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

within and outside of the Cayman Islands. On July 13, 2026, the Officeholders filed with the Bankruptcy Court the *Motion of Alexander Lawson and Barry Lynch, in Their Capacities as Cayman-Appointed Officeholders, for an Order (I) Recognizing Their Appointment as Officeholders, (II) Clarifying the Scope of Their Powers and Duties in the Chapter 11 Cases, and (III) Granting Related Relief* (the "Recognition Motion") seeking recognition of their appointment and clarification of the scope of their powers and duties in the chapter 11 cases. On July 30, 2026, the Bankruptcy Court entered an order recognizing the Officeholders' appointment by the Cayman Court. Bankr. D. Del. C.A. No. 25-12177-LSS [Docket No. 1000].

4. In the interim, on July 29, 2026, this Court entered the Parties' stipulation extending time extending the deadline for Appellees' answering brief(s) to August 28, 2026, and Appellants' reply brief to September 11, 2026. C.A. No. 26-495, D.I. 48; C.A. No. 26-543, D.I. 32.

5. On August 27, 2026, this Court entered the Parties' stipulation extending the deadline for Appellees' answering brief(s) to October 9, 2026, and Appellants' reply brief to October 22, 2026. C.A. No. 26-495, D.I. 49; C.A. No. 26-543, D.I. 33.

6. On October 9, 2026, this Court entered the Parties' stipulation extending the deadline for Appellees' answering brief(s) to October 30, 2026, and Appellants' reply brief to November 12, 2026. C.A. No. 26-495, D.I. 51; C.A. No. 26-543, D.I. 35.

7. On October 27, 2026, debtor ATP Life Science Ventures LP filed a still pending motion to disqualify Quinn Emmanuel Urquhart & Sullivan from representing the portfolio company debtors and ATP II GP Ltd.

8. The Officeholders conferred with the Parties and all Parties have further agreed on a 35-day extension of time on the current briefing deadlines.

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

| Event | Current Deadline | Amended Deadline |
|---|---|---|
| Deadline for Appellees' answering brief(s) | October 30, 2026 | December 4, 2026 |
| Deadline for Appellants' reply brief | November 12, 2026 | December 17, 2026 |

Dated: October 30, 2026

Respectfully submitted,

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SO ORDERED this _____ day of October, 2026.

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The Hon. Jennifer L. Hall
United States District Judge