

**GIBBONS P.C.**

Robert K. Malone  
Kyle P. McEvelly  
One Gateway Center  
Newark, New Jersey 07102-5310  
Telephone: (973) 596-4500  
Email: rmalone@gibbonslaw.com  
kmcevilly@gibbonslaw.com

-and-

**MCDERMOTT WILL & EMERY LLP**

Darren Azman (admitted *pro hac vice*)  
Deanna D. Boll  
One Vanderbilt Avenue  
New York, New York 10017-3852  
Telephone: (212) 547-5400  
Email: dazman@mwe.com  
dboll@mwe.com

*Co-Counsel to Natera Inc.*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:  
  
INVITAE CORPORATION, *et al.*,  
  
Debtors.<sup>1</sup>

(Hon. Michael B. Kaplan)  
Chapter 11  
Case No. 24-11362 (MBK)  
(Jointly Administered)  
**Hearing Date: July 22, 2024 at 10:00 a.m. (ET)**  
**Objection Deadline: July 15, 2024**

**NOTICE OF NATERA INC.’S MOTION FOR RELIEF FROM STAY,  
PURSUANT TO SECTION 362 OF THE BANKRUPTCY CODE, TO  
INITIATE DELAWARE STATE LAW PROCEEDING**

<sup>1</sup> The last four digits of Debtor Invitae Corporation’s tax identification number are 1898. A complete list of the Debtors in these chapter 11 cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ claims and noticing agent at [www.kcellc.net/invitae](http://www.kcellc.net/invitae). The Debtors’ service address in these chapter 11 cases is 1400 16th Street, San Francisco, California 94103.



**PLEASE TAKE NOTICE** that Natera Inc. (“Natera”) filed *Natera Inc.’s Motion for Relief from Stay, Pursuant to Section 362 of the Bankruptcy Code, to Initiate Delaware State Law Proceeding* (the “Motion”) with the United States Bankruptcy Court for the District of New Jersey (the “Bankruptcy Court”).

**PLEASE TAKE FURTHER NOTICE** that a hearing to consider the relief sought in the Motion will be held on **July 22, 2024 at 10:00 a.m. (ET)** before the Honorable Michael B. Kaplan, United States Bankruptcy Court for the District of New Jersey, at the Clarkson S. Fisher United States Courthouse, 402 East State Street, Second Floor, Courtroom No. 8, Trenton, New Jersey 08608.

**PLEASE TAKE FURTHER NOTICE** that responses or objections, if any, to the Motion shall: (i) be in writing; (ii) set forth the specific basis thereof; (iii) be filed with the Clerk of the Bankruptcy Court; and (iv) be served upon the Natera’s undersigned counsel, together with proof of service thereof, so as to be actually received no later than **July 15, 2024** (the “Objection Deadline”).

**PLEASE TAKE FURTHER NOTICE** that unless a response or objection is timely filed and served in accordance with this notice, it may not be considered by the Bankruptcy Court. In the event no objections are filed and served by the Objection Deadline, the relief requested in the Motion may be granted without a hearing.

**PLEASE TAKE FURTHER NOTICE** that Natera has submitted a proposed form of order herewith. Oral argument is requested in the event an objection is timely filed.

**IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: July 1, 2024  
Newark, New Jersey

**GIBBONS P.C.**

/s/ Robert K. Malone  
Robert K. Malone  
Kyle P. McEvilly  
One Gateway Center  
Newark, New Jersey 07102-5310  
Telephone: (973) 596-4500  
Email: rmalone@gibbonslaw.com  
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*Co-Counsel for Natera Inc.*

**NATERA INC.'S MOTION  
FOR RELIEF FROM STAY, PURSUANT TO SECTION 362 OF  
THE BANKRUPTCY CODE, TO INITIATE DELAWARE STATE LAW PROCEEDING**

**(Filed Under Seal)**

**EXHIBIT A**

**FARR DECLARATION**

**(Filed Under Seal)**

**EXHIBIT B**

**ASSET PURCHASE AGREEMENT**

**(Filed Under Seal)**

**PROPOSED ORDER**

**(Filed Under Seal)**