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

In re:

INVITAE CORPORATION, *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11362 (MBK)

(Jointly Administered)

**APPLICATION FOR ORDER SHORTENING TIME FOR HEARING ON  
DEBTORS' MOTION TO FILE UNDER SEAL DEBTORS' OBJECTION TO  
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION FOR  
(I) LEAVE, STANDING AND AUTHORITY TO COMMENCE AND PROSECUTE**

<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.kccollc.net/invitae](http://www.kccollc.net/invitae). The Debtors' service address in these chapter 11 cases is 1400 16<sup>th</sup> Street, San Francisco, California 94103.



**CERTAIN CLAIMS AND CAUSES OF ACTION ON BEHALF OF DEBTORS’  
ESTATES AND (II) EXCLUSIVE SETTLEMENT AUTHORITY**

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TO THE HONORABLE MICHAEL B. KAPLAN,  
CHIEF UNITED STATES BANKRUPTCY JUDGE:

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) by and through their undersigned counsel request that the time period to notice a hearing on the *Debtors’ Motion to File Under Seal Debtors’ Objection to the Official Committee of Unsecured Creditors’ Motion for (I) Leave, Standing and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of Debtors’ Estates and (II) Exclusive Settlement Authority* (the “Motion to Seal”),<sup>2</sup> as required by Fed. R. Bankr. P. 2002 be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and respectfully submit:

1. A shortened time hearing is requested because: As set forth in the Motion to Seal, the Unredacted Standing Motion Objection and Goldfine Decl. submitted by the Debtors in response to the Standing Motion reference certain material that the Debtors have designated as “Confidential” or “Highly Confidential” pursuant to the Protective Order and contain certain proprietary information of the Debtors. The Standing Motion and Unredacted Standing Motion Objection are scheduled to be heard on July 9, 2024 at 11:00 a.m. The Debtors submit that the Motion to Seal should be heard together with the Unredacted Standing Motion Objection to protect the interests of the Debtors and to promote judicial economy. The Debtors do not believe that any parties will be prejudiced by the request to shorten time as the relief sought in the Motion to Seal relates solely to sealing of certain information.

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<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion to Seal.

2. State the hearing dates requested: The Debtors respectfully request that the Court hear the Motion to Seal on July 9, 2024 at 11:00 a.m., subject to the Court's availability.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

**WHEREFORE**, the Debtors respectfully request entry of the proposed order shortening time, in substantially the form submitted herewith, granting the relief requested herein and such other relief as is just and proper under the circumstances.

Dated: July 2, 2024

*/s/ Michael D. Sirota*

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*Co-Counsel to the Debtors and  
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**Proposed Order**

Caption in Compliance with D.N.J. LBR 9004-1(b)

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
In re:  INVITAE CORPORATION, <i>et al.</i> ,  Debtors. <sup>1</sup>	Chapter 11  Case No. 24-11362 (MBK)  (Jointly Administered)

**ORDER SHORTENING TIME PERIOD FOR NOTICE**

The relief set forth on the following pages, numbered three (3) through four (4), is hereby **ORDERED.**

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<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 16<sup>th</sup> Street, San Francisco, California 94103.

(Page 2)

Debtors: INVITAE COPORATION, *et al.*

Case No. 24-11362 (VFP)

Caption of Order: ORDER SHORTENING TIME PERIOD FOR NOTICE

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**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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(Page 3)

Debtors: INVITAE COPORATION, *et al.*  
Case No. 24-11362 (VFP)  
Caption of Order: ORDER SHORTENING TIME PERIOD FOR NOTICE

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Upon review of the Debtors' *Application for Order Shortening Time for Hearing on Debtors' Motion to File Under Seal Debtors' Objection to the Official Committee of Unsecured Creditors' Motion for (I) Leave, Standing and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of Debtors' Estates and (II) Exclusive Settlement Authority* (the "Application"),<sup>3</sup> of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Order") requesting that the time period for the *Debtors' Motion to File Under Seal Debtors' Objection to the Official Committee of Unsecured Creditors' Motion for (I) Leave, Standing and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of Debtors' Estates and (II) Exclusive Settlement Authority* (the "Motion to Seal"), be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1),

**IT IS HEREBY ORDERED THAT:**

1. A hearing will be conducted on the Motion to Seal on \_\_\_\_\_, 2024 at \_\_\_\_\_:\_\_\_\_\_ .m. (E.T.), before the Honorable Chief Judge Michael B. Kaplan, Clarkson S. Fisher United States Courthouse, 402 East State Street, Second Floor, Courtroom 8, Trenton, NJ 08608.
2. The Debtors must serve a copy of this Order, and all related documents to all parties in interest by either regular mail or email, as applicable.
3. Service must be made within \_\_\_\_\_ days of the date of this Order.
4. Notice by telephone is not required.

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<sup>3</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Application.



(Page 4)

Debtors: INVITAE COPORATION, *et al.*

Case No. 24-11362 (VFP)

Caption of Order: ORDER SHORTENING TIME PERIOD FOR NOTICE

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5. Any objections to the Motion to Seal must be filed no later than \_\_\_\_\_ days before the hearing.
  
6. Parties may request to appear by Zoom by submitting an email request to Chambers ([chambers\\_of\\_mbk@njb.uscourts.gov](mailto:chambers_of_mbk@njb.uscourts.gov)) prior to the return date.