

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

In re:  INVIVO THERAPEUTICS CORPORATION, <i>et al.</i> , <sup>1</sup>  <p align="center">Debtors.</p>	Chapter 11  Case No. 24-10137 (MFW)  (Jointly Administered)  Hearing Date: N/A Obj. Deadline: April 25, 2024 at 4:00 p.m. (ET)
---	---

**SUMMARY OF SECOND MONTHLY APPLICATION OF LANDIS RATH & COBB  
 LLP, COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION,  
 FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES  
 PURSUANT TO 11 U.S.C. §§ 330 AND 331 FOR THE PERIOD FROM  
MARCH 1, 2024 THROUGH MARCH 31, 2024**

Name of Applicant: Landis Rath & Cobb LLP

Authorized to Provide Professional Services to: Debtors and Debtors-In-Possession

Date of Retention: February 22, 2024, effective *nunc pro tunc* to February 1, 2024

Period for which compensation and reimbursement sought: March 1, 2024 through March 31, 2024

Amount of monthly fees to be approved as actual, reasonable and necessary: \$46,715.50 (80% = \$37,372.40)

Amount of monthly expenses sought as actual, reasonable and necessary: \$1,075.10

This is a:   x   monthly        interim        final application

Prior Applications: .

		Requested		Approved	
Dated Filed	Period Covered	Fees	Expenses	Fees	Expenses
3/12/2024	2/1/24 – 2/29/24	\$97,210.00	\$463.01	\$77,768.00	\$463.01

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: InVivo Therapeutics Corporation (6670) and InVivo Therapeutics Holdings Corp. (8166). The Debtors’ mailing address is 1500 District Avenue, Burlington, MA 01803.



**SUMMARY OF BILLING BY PROFESSIONAL**  
**FEBRUARY 1, 2024 THROUGH AND INCLUDING FEBRUARY 29, 2024**

<b>Name of Professional</b>	<b>Position w/LRC and Year of Admission</b>	<b>Year of Law School Graduation</b>	<b>Hourly Billing Rate<sup>2</sup></b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Matthew B. McGuire	Partner; admitted PA 2001, DE 2003	May, 2000	\$1,025.00	22.30	\$22,857.50
<b>Partner Total</b>				<b>22.30</b>	<b>\$22,857.50</b>
Joshua B. Brooks	Associate; admitted MD 2020, DE 2022	May 2020	\$535.00	33.80	\$18,083.00
George A. Williams	Associate; admitted DE 2022	May, 2021	\$450.00	4.20	\$1,890.00
<b>Associate Total</b>				<b>38.00</b>	<b>\$19,973.00</b>
<b>Lawyers Total</b>				<b>60.30</b>	<b>\$42,830.50</b>
Melissa Ramirez	Paralegal	N/A	\$350.00	0.40	\$140.00
Jennifer L. Ford	Paralegal	N/A	\$350.00	10.40	\$3,640.00
Mark Hitchens	Paralegal	N/A	\$350.00	0.30	\$105.00
<b>Non-Legal Professional Total</b>				<b>11.10</b>	<b>\$3,885.00</b>
<b>GRAND TOTAL</b>				<b>71.40</b>	<b>\$46,715.50</b>

**Blended Hourly Rate: \$654.28**

<sup>2</sup> Landis Rath & Cobb LLP's billing rates have not changed during the Application Period (defined below).

**STATEMENT OF FEES BY PROJECT CATEGORY<sup>3</sup>**  
**MARCH 1, 2024 THROUGH AND INCLUDING MARCH 31, 2024**

Project Category	Hours	Fee Amount
B110 – Asset Analysis and Recovery	0.00	\$0.00
B112 – Asset Disposition	0.00	\$0.00
B114 – Assumption/Rejection of Leases and Contracts	3.40	\$1,966.00
B120 – Business Operations	1.90	\$1,088.00
B122 – Case Administration	5.30	\$3,053.50
B124 – Claims Administration & Operations	11.50	\$6,597.50
B126 – Employee Benefits/Pensions	0.00	\$0.00
B130 – Financing/Cash Collateral	0.00	\$0.00
B134 – Hearings	2.80	\$1,165.00
B135 – Litigation	0.00	\$0.00
B136 – LRC Retention & Fee Matters	6.60	\$3,282.00
B139 – Equity Committee	14.80	\$14,680.00
B140 – Creditor Inquiries	0.50	\$267.50
B144 – Non-LRC Retention & Fee Matters	17.70	\$9,081.00
B146 – Plan and Disclosure Statement (including Business Plan)	2.70	\$2,700.00
B151 – Schedules/Operating Reports	4.20	\$2,835.00
B152 – Tax Issues	0.00	\$0.00
<b>TOTAL</b>	<b>71.40</b>	<b>\$46,715.50</b>

**MONTHLY EXPENSE SUMMARY**

Expenses Category	AMOUNT
Inhouse Copying	\$114.80
Online Research	\$0.00
Delivery Services/Messengers	\$0.00
Document Retrieval	\$46.30
Lien Searches	\$914.00
Meals	\$0.00
Filing Fee	\$0.00
<b>TOTAL</b>	<b>\$1,075.10</b>

<sup>3</sup> The subject matter of certain time entries may be appropriate for more than one project category. In such instances, time entries generally have been included in the most appropriate category. Time entries do not appear in more than one category.

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

In re:

INVIVO THERAPEUTICS CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-10137 (MFW)

(Jointly Administered)

Hearing Date: N/A

Obj. Deadline: April 25, 2024 at 4:00 p.m. (ET)

**SECOND MONTHLY APPLICATION OF LANDIS RATH & COBB LLP,  
COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION, FOR  
COMPENSATION AND REIMBURSEMENT OF EXPENSES  
PURSUANT TO 11 U.S.C. §§ 330 AND 331 FOR THE PERIOD FROM  
MARCH 1, 2024 THROUGH MARCH 31, 2024**

Landis Rath & Cobb LLP (“LRC”), counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), submits this *Second Monthly Application of Landis Rath & Cobb LLP, Counsel to the Debtors and Debtors-In-Possession, for Compensation and Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 for the Period from March 1, 2024 through March 31, 2024* (the “Application”). In the Application, LRC seeks payment for legal services performed during the period commencing March 1, 2024 through and including March 31, 2024 (the “Application Period”). In support of the Application, LRC respectfully states 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. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: InVivo Therapeutics Corporation (6670) and InVivo Therapeutics Holdings Corp. (8166). The Debtors’ mailing address is 1500 District Avenue, Burlington, MA 01803.

is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(A) and (M), and the Court may enter a final order consistent with Article III of the United States Constitution.<sup>2</sup>

2. The statutory bases for the relief sought herein are sections 105(a), 330 and 331 of chapter 11 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (as amended or modified, the “Bankruptcy Code”).

### **BACKGROUND**

3. On February 1, 2024 (the “Petition Date”), the Debtors commenced the above-captioned chapter 11 cases (the “Chapter 11 Cases”) by each filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

4. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to Bankruptcy Code sections 1107(a) and 1108. As of the date of this Application, no trustee, examiner or statutory committee has been appointed in these Chapter 11 Cases.

5. Additional information regarding the circumstances leading to the commencement of these Chapter 11 Cases and information regarding the Debtors’ businesses and capital structure is set forth in the *Declaration of Richard Christopher in Support of the Debtors’ Chapter 11 Petitions and First Day Pleadings* [D.I. 3].

6. On February 22, 2024, the Court entered its *Order Authorizing the Employment and Retention of Landis Rath & Cobb LLP as Counsel, Nunc Pro Tunc to the Petition Date, Pursuant to Bankruptcy Code Section 327(a), Bankruptcy Rules 2014 and 2016 and Local Rule 2014-1* [D.I.

---

<sup>2</sup> Pursuant to rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), LRC hereby confirms its consent to entry of a final order by the Bankruptcy Court in connection with this Application if it is later determined that the Bankruptcy Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

83] (the “LRC Retention Order”) authorizing the Debtors’ retention of LRC as their counsel in these Chapter 11 Cases.

7. On February 22, 2024, the Court entered its *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [D.I. 85] (the “Interim Compensation Order”).

**RELIEF REQUESTED**

8. By this Application and in accordance with the Interim Compensation Order, LRC seeks (i) allowance of compensation as an administrative expense of the Debtors’ estates in the amount of \$46,715.50 for reasonable and necessary professional services rendered, (ii) payment of compensation in the amount of 80% thereof (in the amount of \$37,372.40) and (iii) payment of \$1,075.10 for actual and necessary expenses incurred during the Application Period.

**COMPENSATION REQUESTED**

9. The services performed by LRC during the Application Period included, among others, (i) preparing and/or assisting in the preparation, finalization and filing of various pleadings and orders submitted to the Court and served on parties in interest; (ii) regularly conferring with the Debtors, their other professionals and various parties-in-interest regarding issues related to the Chapter 11 Cases and the various pleadings filed herein; (iii) preparing for and participating in the hearings held in the Chapter 11 Cases; and (iv) researching and advising the Debtors and their other professionals with respect to numerous issues in connection with the Chapter 11 Cases. Attached hereto as **Exhibit A** is a detailed itemization, by project category, of all services performed by LRC with respect to the Chapter 11 Cases during the Application Period. This detailed itemization complies with Local Rule 2016-2 in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of the activity, all time

is billed in increments of one-tenth (1/10) of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified.

10. The timekeepers who rendered services related to each category are identified in **Exhibit A**, along with the number of hours for each individual and the total compensation sought by each category. All services for which LRC requests compensation were performed for, or on behalf of, the Debtors.

### **REIMBURSEMENT OF EXPENSES**

11. LRC incurred out-of-pocket expenses during the Application Period in the amount of \$1,075.10. Attached hereto as **Exhibit B** is a description of the expenses actually incurred by LRC in the performance of services rendered as counsel to the Debtors. The expenses are broken down into categories of charges, which may include, among other things, the following charges: photocopying, printing, outgoing facsimiles, document retrieval, postage, third-party conference calls, messenger service, transcripts, computerized legal research, filing fees, working meals, secretarial overtime, and other expenses.

12. To more efficiently handle the voluminous copying of pleadings served and filed in these Chapter 11 Cases, LRC on occasion retained third-party duplication service providers. LRC seeks reimbursement only for the actual expenses charged by such third-party service providers.

13. In accordance with section 330 of the Bankruptcy Code, LRC seeks reimbursement only for the actual cost of such expenses to LRC. LRC submits that all such expenses incurred

were customary, necessary and related to the Chapter 11 Cases and, by this Application, requests reimbursement of the same.<sup>3</sup>

### **VALUATION OF SERVICES**

14. Professionals of LRC have expended a total of 71.40 hours in connection with this matter during the Application Period.

15. The amount of time spent by each of the professionals providing services to the Debtors for the Application Period is set forth in **Exhibit A**. The rates are LRC's regular hourly rates of compensation for work of this nature. The reasonable value of the services rendered by LRC for the Application Period as counsel for the Debtors in the Chapter 11 Cases is \$46,715.50.

16. LRC submits that the time entries included in **Exhibit A** attached hereto and the expense breakdown set forth in **Exhibit B** attached hereto are in compliance with the requirements of Local Rule 2016-2.

17. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given the complexities of these Chapter 11 Cases, the time expended, the nature and extent of the services rendered, the value of such services, and the costs of comparable services other than in a case under this title.

### **CERTIFICATE OF COMPLIANCE AND WAIVER**

18. The undersigned representative of LRC certifies that he has reviewed the requirements of Local Rules 2016-2 and that the Application substantially complies with such rule. To the extent that the Application does not comply in all respects with the requirements of Local

---

<sup>3</sup> LRC reserves all rights with respect to any expense cap sought to be imposed or otherwise enforced by the Office of the United States Trustee that is not consistent with or deviates from the Local Rules or applicable orders entered by the Court in these Chapter 11 Cases.



Rule 2016-2, LRC believes that such deviations are not material and respectfully requests that any such requirements be waived.

**NOTICE AND NO PRIOR REQUEST**

19. Notice of this Application has been given to the following parties or, in lieu of, to their counsel, if known: the Office of the United States Trustee for the District of Delaware. LRC submits that no other or further notice is necessary.

20. No prior request for the relief sought in this Application has been made to this or any other court.

WHEREFORE, LRC respectfully requests that the Court (i) grant the Application and (ii) grant such further relief as is just and proper.

Dated: April 11, 2024  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Matthew B. McGuire

Matthew B. McGuire (No. 4366)  
Joshua B. Brooks (No. 6765)  
George A. Williams III (No. 6964)  
919 Market Street, Suite 1800  
Wilmington, Delaware 19801  
Telephone: (302) 467-4400  
Facsimile: (302) 467-4450  
Email: mcguire@lrclaw.com  
brooks@lrclaw.com  
williams@lrclaw.com

*Counsel for the Debtors and Debtors-In-Possession*

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

In re:

INVIVO PHARMACEUTICALS CORPORATION, *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-10137 (MFW)

(Jointly Administered)

Hearing Date: N/A

Obj. Deadline: April 25, 2024 at 4:00 p.m. (ET)

**NOTICE OF SECOND MONTHLY APPLICATION OF LANDIS RATH & COBB LLP,  
COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION, FOR  
COMPENSATION AND REIMBURSEMENT OF EXPENSES PURSUANT  
TO 11 U.S.C. §§ 330 AND 331 FOR THE PERIOD FROM  
MARCH 1, 2024 THROUGH MARCH 31, 2024**

TO: Office of the United States Trustee for the District of Delaware.

**PLEASE TAKE NOTICE** that on the date hereof, Landis Rath & Cobb LLP (“LRC”) filed the *Second Monthly Application of Landis Rath & Cobb LLP, Counsel to the Debtors and Debtors-in-Possession, for Compensation and Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 for the Period from March 1, 2024 through March 31, 2024* (the “Application”) with the United States Bankruptcy Court for the District of Delaware.

**PLEASE TAKE FURTHER NOTICE** that objections (the “Objections”), if any, to the Application must be made in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [D.I. 85] (the “Interim Compensation Order”). Objections must be served on the following parties so as to be received no later than **4:00 p.m. ET on April 25, 2024** (the “Objection Deadline”):

- (1) Counsel to the Debtors, Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, Wilmington, Delaware 19801, Attn: Matthew B. McGuire, Esq. (mcguire@lrclaw.com) and Joshua B. Brooks, Esq. (brooks@lrclaw.com);
- (2) Office of the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Joseph Cudia, Esq. (joseph.cudia@usdoj.gov); and
- (3) counsel to any Committee.

**PLEASE TAKE FURTHER NOTICE THAT IN ACCORDANCE WITH THE INTERIM COMPENSATION ORDER, IF NO OBJECTIONS ARE SERVED IN ACCORDANCE WITH THE INTERIM COMPENSATION ORDER, THE DEBTORS WILL**

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: InVivo Therapeutics Corporation (6670) and InVivo Therapeutics Holdings Corp. (8166). The Debtors’ mailing address is 1500 District Avenue, Burlington, MA 01803.

BE AUTHORIZED TO PAY LRC AN AMOUNT EQUAL TO 80% OF THE FEES AND 100% OF THE EXPENSES REQUESTED IN THE APPLICATION THAT ARE UNOPPOSED WITHOUT FURTHER COURT ORDER.

**PLEASE TAKE FURTHER NOTICE** that if an Objection to the Application is served by the Objection Deadline, the parties shall follow the procedures set forth in the Interim Compensation Order.

Dated: April 11, 2024  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Matthew B. McGuire

Matthew B. McGuire (No. 4366)

Joshua B. Brooks (No. 6765)

George A. Williams III (No. 6964)

919 Market Street, Suite 1800

Wilmington, Delaware 19801

Telephone: (302) 467-4400

Facsimile: (302) 467-4450

Email: mcguire@lrclaw.com

brooks@lrclaw.com

williams@lrclaw.com

*Counsel for the Debtors and Debtors in Possession*

**EXHIBIT A**

Date: 04/11/2024

**Summary Fee Task Code Billing Report**  
Landis Rath & Cobb LLP

Page: 1

		<u>Hours to Bill</u>	<u>Amount</u>	
<b>Total for Timekeeper 10</b>	Billable	22.30	22,857.50	Matthew B. McGuire
<b>Total for Timekeeper 21</b>	Billable	4.20	1,890.00	George A. Williams
<b>Total for Timekeeper 29</b>	Billable	0.30	105.00	Mark Hitchens
<b>Total for Timekeeper 32</b>	Billable	0.40	140.00	Melissa Ramirez
<b>Total for Timekeeper 35</b>	Billable	33.80	18,083.00	Joshua B. Brooks
<b>Total for Timekeeper 36</b>	Billable	10.40	3,640.00	Jennifer L. Ford
<b>GRAND TOTALS</b>				
	Billable	71.40	46,715.50	

Fee App - Detailed Fees  
Landis Rath & Cobb LLP

Client	Trans Date	Tkpr	Hours to Bill	Amount	
<b>Phase ID B114 Assumption/Rejection of Leases and Contracts</b>					
1394.002	03/12/2024	JBB	0.40	214.00	Emails with GAW re: draft cure notice (.1); review draft cure notice (.3)
1394.002	03/13/2024	JBB	0.30	160.50	Review and revise cure notice (.2); emails with MBM re: same (.1)
1394.002	03/14/2024	JBB	0.70	374.50	Review and revise draft cure schedule (.4); emails with Sonoran and client teams re: necessary revisions and cure issues (.3)
1394.002	03/14/2024	MBM	0.30	307.50	review of cure notice and schedule
1394.002	03/15/2024	JBB	0.80	428.00	Review and revise updated cure schedule (.6); emails with Sonoran and client team re: cure schedule (.2)
1394.002	03/15/2024	JBB	0.90	481.50	Emails with MBM re: cure notice status (.1); emails with M. Barney re: same (.2); confer with M. Foster re: same (.1); emails with R. Christopher and H. Hamel for approval to file (.1); finalize notice and schedule and assist with filing (.4)
<b>Total for Phase ID B114</b>			Billable	3.40	1,966.00 Assumption/Rejection of Leases and Contracts
<b>Phase ID B120 Business Operations</b>					
1394.002	03/04/2024	JBB	0.30	160.50	Call with working group
1394.002	03/07/2024	JLF	0.30	105.00	Emails to/from J. Brooks re: Review and revise Notice of OCP Motion (.1); Analyze and revise Notice of OCP Motion (.2)
1394.002	03/07/2024	JLF	0.40	140.00	Emails to/from M. McGuire and J. Brooks re: OCP Motion (.1); Finalize and file re: same (.2); Email to KCC to effectuate service re: same (.1)
1394.002	03/08/2024	JLF	0.10	35.00	Inform M. McGuire, J. Brooks and G. Williams re: Objection deadline of OCP Motion
1394.002	03/11/2024	GAW	0.30	135.00	Attend InVivo Working Group Call
1394.002	03/11/2024	MBM	0.30	307.50	participate in weekly status call
1394.002	03/29/2024	MBM	0.20	205.00	email with shareholder re: status
<b>Total for Phase ID B120</b>			Billable	1.90	1,088.00 Business Operations
<b>Phase ID B122 Case Administration</b>					
1394.002	03/04/2024	JBB	0.10	53.50	Confer with JF re: upcoming filings
1394.002	03/06/2024	JLF	0.20	70.00	meet and confer with J Brooks re: up coming filings and 1st Monthly LRC Fee Application
1394.002	03/06/2024	JLF	0.50	175.00	Analyze Docket (.2); Revise Critical Dates memorandum (.2); Email to J. Brooks re: same (.1)
1394.002	03/07/2024	JBB	0.20	107.00	Confer with MBM and JF re: filings
1394.002	03/08/2024	JBB	0.30	160.50	Review updated critical dates calendar (.2); email GAW and JF re: same (.1)
1394.002	03/08/2024	JLF	0.40	140.00	Update Critical Dates memorandum (.3); Email to M. McGuire, J. Brooks and G. Williams re: same (.1)
1394.002	03/11/2024	JBB	0.30	160.50	Attend and participate in client working group call
1394.002	03/11/2024	JLF	0.30	105.00	Update Critical Dates Memo (.2); Email to M. McGuire, J. Brooks and G. Williams re: same (.1)
1394.002	03/14/2024	JLF	0.30	105.00	Emails to/from M. McGuire and J. Brooks re: Notice of Filing of Revised Schedule of Ordinary Course Professionals (.1); Finalize and file Notice of Filing of Revised Schedule of Ordinary Course Professionals (.1); Email to KCC to effectuate service re: same (.1)
1394.002	03/14/2024	JLF	0.30	105.00	Update Critical Dates memo (.2); Email to M. McGuire, J. Brooks and G. Williams re: same (.1)
1394.002	03/21/2024	JBB	0.10	53.50	Emails with KCC re: service issues
1394.002	03/25/2024	MBM	0.50	512.50	call with working group re: status
1394.002	03/25/2024	JBB	0.50	267.50	Attend working group call
1394.002	03/26/2024	JBB	0.30	160.50	Review case docket for upcoming filings
1394.002	03/27/2024	MBM	0.70	717.50	call with Hamel and Christopher re: UST question on equity committee
1394.002	03/27/2024	JBB	0.30	160.50	Confer with MBM re: filing of Certificates of No Objection (.1); email MR to file same (.1); confer with MR re: same (.1)
<b>Total for Phase ID B122</b>			Billable	5.30	3,053.50 Case Administration
<b>Phase ID B124 Claims Administration &amp; Objections</b>					
1394.002	03/06/2024	MBM	0.70	717.50	review and revise bar date motion
1394.002	03/07/2024	JBB	0.20	107.00	Emails and confer with GAW re: bar date issues
1394.002	03/07/2024	JBB	1.10	588.50	Review and finalize bar date motion (.5); emails with KCC re: proof of claim and interest forms (.4); confer with J. Miller re: same (.2)
1394.002	03/07/2024	JLF	0.30	105.00	Emails to/from J. Brooks re: Review and revise Notice of Bar Date Motion (.1); Analyze and revise Notice of Bar Date Motion (.2)
1394.002	03/07/2024	GAW	0.30	135.00	Review bar date motion
1394.002	03/08/2024	JBB	3.40	1,819.00	Revise notice of bar date motion (.2); review and revise bar date motion (1.0); confer with MRP re: admin bar date issues (.2); emails with Sonoran re: same (.2); research re: potential admin claims (.5); review bar date precedent (.2); call with KCC re: bar date issues (.2); review and revise draft proof of claim forms received from KCC (.5); draft response email to KCC (.3); email JF re: notice of bar date revisions (.1)
1394.002	03/11/2024	JBB	1.30	695.50	Revise bar date motion (.4); confer with JF re: filing same (.1); emails with MBM re: same (.1); emails with R. Christopher and H. Hamel re: same (.1); finalize same for filing (.3); assist with filing same (.3)
1394.002	03/11/2024	JBB	0.10	53.50	Emails with MBM re: bar date issues for warrant holders
1394.002	03/11/2024	JLF	0.50	175.00	Emails to/from M. MCGuire and J. Brooks re: Bar Date Motion status (.1); Finalize and file re: same (.3); Email to KCC to effectuate service of Bar Date Motion (.1)
1394.002	03/11/2024	MBM	0.20	205.00	review of revised bar date motion
1394.002	03/13/2024	JBB	0.40	214.00	Review UST's comments to bar date order (.2); emails with MBM re: same (.2)
1394.002	03/13/2024	JBB	0.20	107.00	Incorporate UST's comments to bar date order
1394.002	03/13/2024	JBB	0.20	107.00	Follow up emails with MBM re: UST's comments to bar date order (.1); email to UST re: same (.1)
1394.002	03/14/2024	JBB	0.10	53.50	Emails with UST re: comments to bar date order
1394.002	03/15/2024	JLF	0.40	140.00	Emails to/from J. Brooks re: Cure Notice filing status (.1) Finalize and file Notice of

Date: 04/11/2024

## Detail Fee Task Code Billing Report

Page: 2

Fee App - Detailed Fees  
Landis Rath & Cobb LLP

Client	Trans Date	Tkpr	Hours to Bill	Amount	
<b>Phase ID B124 Claims Administration &amp; Objections</b>					
					Debtors' Intent to Assume and Assign Certain Unexpired Leases and Executory Contracts and Fixing of Cure Amounts [DI 113] (.2); Email to KCC to effectuate service (.1)
1394.002	03/21/2024	JBB	0.10	53.50	Emails with JF re: drafting Certification of Counsel for bar date motion
1394.002	03/25/2024	MBM	0.30	307.50	review of revised bar date order (.2); emails with Brooks and Cudia re: same (.1)
1394.002	03/26/2024	JBB	0.50	267.50	Finalize Certification of Counsel for bar date motion for filing (.2); assist with filing and upload of same (.3)
1394.002	03/28/2024	GAW	0.50	225.00	emails w. MBM & JBB re: bar date notice (.1); review same; assist w. filing (.2); email w. MBM, JBB, InVivo and KCC re: publication of bar date notice (.2)
1394.002	03/28/2024	JBB	0.40	214.00	Emails with GAW re: bar date notice (.1); email MBM to file same (.1); emails with KCC re: publication notice (.2)
1394.002	03/28/2024	MBM	0.30	307.50	review of bar date notice (.2); email with Brooks re: same (.1)
<b>Total for Phase ID B124</b>		Billable	11.50	6,597.50	Claims Administration & Objections
<b>Phase ID B134 Hearings</b>					
1394.002	03/01/2024	JLF	0.50	175.00	Draft Agenda for March 13th hearing (.4); Email to J. Brooks re: same (.1)
1394.002	03/05/2024	JBB	0.40	214.00	Review draft agenda for March 13 hearing (.2); email MBM re: filing same (.1); email chambers for approval to cancel March 13 hearing (.1)
1394.002	03/06/2024	JLF		0.00	emails to/from J. Brooks re: revise agenda for March 13th hearing adding hyperlinks (.1); Revise agenda re: same (.3)
1394.002	03/06/2024	JLF	0.40	140.00	Finalize and file Notice of Agenda of Matters for Hearing on March 13, 2024 (.2); Email to KCC to effectuate service re: same (.1); Email to M. McGuire and J. Brooks re: same (.1)
1394.002	03/06/2024	JBB	0.50	267.50	Revise agenda cancelling March 13, hearing (.2); email JF to hyperlink same (.1); assist with filing same (.2)
1394.002	03/14/2024	JBB	0.10	53.50	Emails with GAW and JF re: comments for agenda
1394.002	03/14/2024	JLF	0.50	175.00	Emails to/from J. Brooks and G. Williams re: draft April 9th Agenda and status of bar date motion and the OCP motion (.1); Begin draft April 9th agenda (.4)
1394.002	03/15/2024	JLF	0.40	140.00	Continue drafting Begin draft April 9th agenda (.3); Email to J. Brooks and G. Williams re: same (.1)
<b>Total for Phase ID B134</b>		Billable	2.80	1,165.00	Hearings
<b>Phase ID B136 LRC Retention &amp; Fee Matters</b>					
1394.002	03/06/2024	JLF	1.70	595.00	Emails to/from J. Brooks re: draft LRC 1st Monthly Fee Application (.1); Draft LRC's 1st Monthly Fee Application (1.6)
1394.002	03/08/2024	JBB	1.10	588.50	Review LRC fee statements for fee application
1394.002	03/11/2024	JBB	0.10	53.50	Confer with JF re: filing fee application
1394.002	03/12/2024	JBB	1.50	802.50	Review and revise LRC fee application (.3); emails with JF re: notice for same (.2); email MBM re: review of same (.1); review and finalize same (.4); email MBM re: filing approval for same (.2); assist with filing same (.3)
1394.002	03/12/2024	JLF	0.90	315.00	Emails to/from J. Brooks re: revise LRC's Monthly fee application with amounts (.1); Revise LRC's February Monthly Fee Application (.8)
1394.002	03/12/2024	JLF	0.40	140.00	Emails to/from M. McGuire and J. Brooks re: (First) of Landis Rath & Cobb LLP, Counsel to the Debtors and Debtors-In-Possession, for Compensation and Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 for the period February 1, 2024 to February 29, 2024 (.1); Finalize and file re: same (.2); Email to KCC to effectuate service re: same (.1)
1394.002	03/12/2024	MBM	0.70	717.50	review and revise LRC fee application
1394.002	03/27/2024	MR	0.20	70.00	file Certificate of No Objection re: LRC's 1st monthly fee app; emails with MBM and JBB re: same
<b>Total for Phase ID B136</b>		Billable	6.60	3,282.00	LRC Retention & Fee Matters
<b>Phase ID B139 Equity Committee</b>					
1394.002	03/26/2024	JBB	0.50	267.50	Call with MBM and G. Shuster re: equity committee requests (.2); emails with MBM and G. Shuster re: same (.2); emails with UST re: same (.1)
1394.002	03/26/2024	MBM	2.50	2,562.50	review of EC emails and correspondence from UST re: equity committee (.2); emails and call with Shuster re: same (.5); email with Hamel and Christopher re: same (.2); research re: EC standards and response thereto (1.6)
1394.002	03/27/2024	MBM	4.30	4,407.50	research (1.2) and draft objection to EC appointment (2.9); emails with Foster and Christopher re: same (.2)
1394.002	03/28/2024	MBM	3.70	3,792.50	draft and revise opposition to equity committee appointment
1394.002	03/28/2024	MBM	1.10	1,127.50	review of financial projections (.6); emails and calls with R. Christopher re: same (.5)
1394.002	03/29/2024	JBB	0.50	267.50	Review draft response letter to UST re: equity committee request (.4); email comments to MBM (.1)
1394.002	03/29/2024	MBM	2.20	2,255.00	numerous emails with Shuster, Hamel and Christopher re: response to EC formation (.5); review and revise letter to UST objecting to formation of EC (1.7)
<b>Total for Phase ID B139</b>		Billable	14.80	14,680.00	Equity Committee
<b>Phase ID B140 Creditor Inquiries</b>					
1394.002	03/05/2024	JBB	0.20	107.00	Receive call re: creditor inquiry to submit proof of claim
1394.002	03/12/2024	JBB	0.30	160.50	Return call from D. Wise, left voicemail (.1); call with D. Wise (.2)
<b>Total for Phase ID B140</b>		Billable	0.50	267.50	Creditor Inquiries
<b>Phase ID B144 Non-LRC Retention &amp; Fee Matters</b>					
1394.002	03/04/2024	JLF	0.40	140.00	Emails to/from J. Brooks and G. Williams re: uploading WH retention order (.1); Assist in uploading order for WH Retention (.3)

Date: 04/11/2024

## Detail Fee Task Code Billing Report

Page: 3

Fee App - Detailed Fees  
Landis Rath & Cobb LLP

Client	Trans Date	Tkpr	Hours to Bill	Amount	
<b>Phase ID B144 Non-LRC Retention &amp; Fee Matters</b>					
1394.002	03/04/2024	JBB	0.40	214.00	Emails with GAW, JF, and chambers re: entry of WH retention order (.3); email retention order to G. Shuster and L. Lifland (.1)
1394.002	03/05/2024	JBB	0.10	53.50	Emails with M. Foster and R. Christopher re: interim compensation procedures
1394.002	03/06/2024	MBM	0.20	205.00	review of OCP motion
1394.002	03/07/2024	GAW	2.20	990.00	emails w. JBB re: OCP motion (.2); review same (1.3); finalize same (.3); confer w. JBB re: same (.2); review local rules (.2);
1394.002	03/07/2024	JBB	0.20	107.00	Emails and confer with GAW re: finalizing OCP motion
1394.002	03/07/2024	JBB	3.10	1,658.50	Review OCP motion and finalize for filing (.9); email same to R. Christopher and H. Hamel re: approval to file (.2); further revise OCP motion (1.0); email further revised draft to MBM for comments (.1); revise WilliamsMarston form of OCP documents (.6); emails with R. Christopher re: WilliamsMarston form of OCP documents (.3);
1394.002	03/12/2024	JBB	0.60	321.00	Draft notice of revised OCP exhibit (.5); email MBM re: OCP cap (.1)
1394.002	03/12/2024	JBB	1.50	802.50	Review and revise Sonoran fee application (.5); email JF re: notice for same (.1); revise and finalize notice (.3); email MBM to file same (.1); finalize same for filing (.3); assist with filing same (.2)
1394.002	03/12/2024	JBB	0.10	53.50	Emails with L. Lifland and A. Chavez re: fee application precedent
1394.002	03/12/2024	JLF	0.40	140.00	Emails to/from J. Brooks re: draft Notice for Sonoran's Monthly fee application (.1); Draft Notice of Sonoran's Monthly Fee Application (.3)
1394.002	03/12/2024	JLF	0.40	140.00	Emails to/from M. McGuire and J. Brooks re: (First) of Landis Rath & Cobb LLP, Counsel to the Debtors and Debtors-In-Possession, for Compensation and Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 for the period February 1, 2024 to February 29, 2024 (.1); Finalize and file re: same (.2); Email to KCC to effectuate service re: same (.1)
1394.002	03/13/2024	JBB	0.60	321.00	Review UST's comments to OCP order (.4); emails with MBM re: same (.2)
1394.002	03/13/2024	JBB	0.30	160.50	Review WH fee application
1394.002	03/13/2024	JBB	0.30	160.50	Follow up emails with MBM re: revised OCP exhibit and UST's comments to OCP order (.1); draft email to UST re: OCP comments (.2)
1394.002	03/14/2024	JBB	0.10	53.50	Emails with UST re: comments to OCP order
1394.002	03/14/2024	JBB	0.60	321.00	Revise OCP order and OCP Declaration consistent with UST's comments
1394.002	03/14/2024	JBB	0.30	160.50	Draft email to R. Christopher & H. Hamel re: revised OCP order and revised OCP list
1394.002	03/14/2024	JBB	0.60	321.00	Finalize WH first monthly fee application (.3); email to MBM for approval to file (.1); assist with filing (.2)
1394.002	03/14/2024	JBB	0.50	267.50	Further revise and finalize revised OCP list (.2); email to MBM for review (.1); assist with filing (.2)
1394.002	03/14/2024	JLF	0.30	105.00	Emails to/from M. McGuire and J. Brooks re: (First) of Wilmer Cutler Pickering Hale and Dorr LLP, Special Corporate Counsel to the Debtors and Debtors-In-Possession, for Compensation and Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 for the period February 1, 2024 to February 29, 2024 (.1); Finalize and file re: same (.1); Email to KCC to effectuate service re: same (.1)
1394.002	03/21/2024	JBB	0.10	53.50	Emails with JF re: drafting Certification of Counsel for OCP motion
1394.002	03/25/2024	MBM	0.30	307.50	review of revised OCP order (.2); emails with Brooks and Cudia re: same (.1)
1394.002	03/26/2024	JBB	0.30	160.50	Email GAW re: Certificate of No Objection and filing same for WH and Sonoran (.1); review and revise Sonoran Certificate of No Objection (.2)
1394.002	03/26/2024	JBB	0.80	428.00	Draft notice of filing WilliamsMarston OCP retention documents (.2); review and finalize same for filing (.3); email MBM re: filing same (.1); assist with filing (.2)
1394.002	03/27/2024	GAW	0.90	405.00	Email w. JBB re: CNO for Debtors' Professionals and review Debtors' Professionals' (WH, LRC, Sonoran) Fee Applications (.1); Revise same (.8)
1394.002	03/27/2024	JBB	0.40	214.00	Review Certificate of No Objection re: WH fee application (.2); emails with GAW re: revisions to same (.2)
1394.002	03/27/2024	JBB	0.30	160.50	Emails with R. Christopher re: OCP payments and possible additional OCP retention
1394.002	03/27/2024	MR	0.20	70.00	file Certificate of No Objection re: sonoran 1st monthly fee app; emails with MBM and JBB re: same
1394.002	03/28/2024	JBB	0.10	53.50	Emails with L. Lifland re: Certificate of No Objection for WilmerHale fee application
1394.002	03/28/2024	JBB	0.10	53.50	Emails with H. Hamel re: possible additional OCP retention
1394.002	03/28/2024	JBB	0.10	53.50	Emails with MR and MH re: filing of bar date notice
1394.002	03/28/2024	JBB	0.20	107.00	Emails with R. Christopher re: SSG fee issues
1394.002	03/29/2024	JBB	0.40	214.00	Finalize Certificate of No Objection for WH fee application (.2); emails with MBM, GAW and MH re: filing same (.1); email L. Lifland to confirm no objections received (.1)
1394.002	03/29/2024	MPH	0.30	105.00	Finalize and file Certificate of No Objection re: Wilmer Hale's 1st Fee Application; Email exchange with JBB re: same

<b>Total for Phase ID B144</b>	Billable	17.70	9,081.00	Non-LRC Retention & Fee Matters
--------------------------------	----------	-------	----------	---------------------------------

**Phase ID B146 Plan and Disclosure Statement (including Business Plan)**

1394.002	03/05/2024	JLF	0.10	35.00	Review/analyze Affidavit of Publication of the Notice of Bid Deadline, Auction, and Sale Hearing in Connection with the Sale of Substantially all of the Debtors Assets in the New York Times [D.I. 100] and Email to M. McGuire, J. Brooks and G. Williams re: same
1394.002	03/23/2024	MBM	0.90	922.50	review and revise plan of liquidation
1394.002	03/25/2024	MBM	1.70	1,742.50	draft and revise plan

<b>Total for Phase ID B146</b>	Billable	2.70	2,700.00	Plan and Disclosure Statement (including Business Plan)
--------------------------------	----------	------	----------	---

**Phase ID B151 Schedules/Operating Reports**

1394.002	03/06/2024	MBM	0.50	512.50	call with Christopher re: 341 meeting
1394.002	03/06/2024	MBM	0.70	717.50	prepare for and attend 341 meeting
1394.002	03/06/2024	JBB	0.20	107.00	Prep session for section 341 meeting
1394.002	03/07/2024	JBB	0.20	107.00	Emails with US Trustee's office re: section 341 meeting (.1); emails with client group re: same (.1)
1394.002	03/07/2024	JBB	0.50	267.50	Attend section 341 meeting



Date: 04/11/2024

**Detail Fee Task Code Billing Report**

Page: 4

Fee App - Detailed Fees  
Landis Rath & Cobb LLP

Client	Trans Date	Tkpr	Hours to Bill	Amount	
<b>Phase ID B151 Schedules/Operating Reports</b>					
1394.002	03/19/2024	JBB	0.20	107.00	Review MORs
1394.002	03/20/2024	JBB	0.20	107.00	Emails with R. Christopher and Sonoran re: draft MORs
1394.002	03/21/2024	JBB	1.10	588.50	Review draft MORs (.8); email R. Christopher re: same (.1); emails with R. Christopher and M. Foster re: attachments to MORs (.2)
1394.002	03/21/2024	JBB	0.60	321.00	Review supporting documentation for MORs (.5); emails with R. Christopher re: same (.1)
<b>Total for Phase ID B151</b>		Billable	4.20	2,835.00	Schedules/Operating Reports
<b>GRAND TOTALS</b>					
		Billable	71.40	46,715.50	

**EXHIBIT B**

Date: 04/11/2024

**Detail Cost Task Code Billing Report**  
Landis Rath & Cobb LLP

Page: 1

<u>Client</u>	<u>Trans Date</u>	<u>Rate</u>	<u>Units</u>	<u>Amount</u>	
<b>Activity ID E101 Inhouse Copying</b>					
1394.002	02/01/2024	0.100	559.00	55.90	Inhouse Copying
1394.002	02/05/2024	0.100	375.00	37.50	Inhouse Copying
1394.002	02/12/2024	0.100	35.00	3.50	Inhouse Copying
1394.002	02/15/2024	0.100	47.00	4.70	Inhouse Copying
1394.002	02/16/2024	0.100	78.00	7.80	Inhouse Copying
1394.002	03/31/2024	0.100	54.00	5.40	Inhouse Copying
<b>Total for Activity ID E101</b>			Billable	114.80	Inhouse Copying
<b>Activity ID E208 Document Retrieval</b>					
1394.002	02/29/2024			32.80	Document Retrieval - PACER
1394.002	03/31/2024			13.50	Docket Retrieval - PACER
<b>Total for Activity ID E208</b>			Billable	46.30	Document Retrieval
<b>Activity ID E229 Lien Searches</b>					
1394.002	02/01/2024			439.00	Lien Searches CSC - Invoice 86115510513 (Nevada)
1394.002	02/01/2024			475.00	Lien Searches CSC - Invoice 86115513005 (Delaware)
<b>Total for Activity ID E229</b>			Billable	914.00	Lien Searches
<b>GRAND TOTALS</b>					
			Billable	1,075.10	

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

In re:

INVIVO THERAPEUTICS CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-10137 (MFW)

(Jointly Administered)

**CERTIFICATION OF MATTHEW B. MCGUIRE**

Matthew B. McGuire, an attorney-at-law, duly admitted and in good standing to practice in the State of Delaware, hereby certifies that:

1. I am a partner in the firm of Landis Rath & Cobb LLP (“LRC”) and I am duly authorized to make this certification on behalf of LRC. LRC was retained by the above-captioned debtors and debtors-in-possession as their counsel pursuant to an order of the Court. This certification is made in support of the *Second Monthly Application of Landis Rath & Cobb LLP, Counsel to the Debtors and Debtors-In-Possession, for Compensation and Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 for the Period from March 1, 2024 through March 31, 2024* (the “Application”) and in compliance with rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (“Rule 2016-2”).

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: InVivo Therapeutics Corporation (6670) and InVivo Therapeutics Holdings Corp. (8166). The Debtors’ mailing address is 1500 District Avenue, Burlington, MA 01803.

2. I have read the Application and I certify that the Application substantially complies with Rule 2016-2.

Dated: April 11, 2024  
Wilmington, Delaware

/s/ Matthew B. McGuire  
Matthew B. McGuire