

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)
) Chapter 11
PROTERRA INC, et al.,1)
) Case No. 23-11120 (BLS)
)
Debtors.) (Jointly Administered)
)
) Ref. Docket Nos. 44, 72 & 142
)

SECOND NOTICE OF EXTENSION
OF DEBTORS' AUTHORITY TO USE CASH COLLATERAL AND SCHEDULING A
FINAL HEARING THEREON

PLEASE TAKE NOTICE that, on August 7, 2023, each Debtor in the above-captioned proceedings filed a voluntary petition for relief under chapter 11 of title 11 of the U.S. Code, 11 U.S.C. §§ 101-1532, in the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that, on August 9, 2023, the Debtors filed the Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [Docket No. 44] (the "Motion").2

PLEASE TAKE FURTHER NOTICE that, on August 10, 2023, the Court entered that certain Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [Docket No. 72] (the "Interim Cash Collateral Order"). The Interim Cash Collateral Order authorized the Debtors to submit a further interim order governing the authority to use cash collateral.

On August 25, 2023, the Court entered that certain Second Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [D.I. 142] (the "Second Interim Cash Collateral Order").

PLEASE TAKE FURTHER NOTICE that paragraph 3 of the Second Interim Cash Collateral Order provides that the Debtors' authority to use Cash Collateral shall terminate at 5:00

1 The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Protterra Inc (9565); and Protterra Operating Company, Inc. (8459). The location of the Debtors' service address is: 1815 Rollins Road, Burlingame, California 94010.

2 Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.



p.m. (prevailing Eastern Time) on September 10, 2023 (the “Interim Period”), *provided that* the Interim Period may be extended pursuant to the terms of paragraph 3 of the Second Interim Cash Collateral Order.

PLEASE TAKE FURTHER NOTICE that the Debtors hereby provide notice that the Interim Period has been extended in accordance with paragraph 3 of the Second Interim Cash Collateral Order until 11:59 p.m. (prevailing Eastern Time) on September 21, 2023.

PLEASE TAKE FURTHER NOTICE that a hearing to consider approval of the Motion on a final basis was originally scheduled to go forward on September 7, 2023. The Motion will now be heard on **September 21, 2023 at 9:00 a.m. (ET)** before the Honorable Brenden Linehan Shannon, United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 6th Floor, Courtroom 1, Wilmington, Delaware 19801.³

PLEASE TAKE FURTHER NOTICE that the Debtors reserve the right to further extend the Interim Period, and provide corresponding notice, in accordance with the Second Interim Cash Collateral Order.

³ The Debtors will file a proposed order governing the use of cash collateral on a final basis in advance of the hearing scheduled for September 21, 2023.

Dated: September 6, 2023
Wilmington, Delaware

Respectfully submitted,

**YOUNG CONAWAY STARGATT &
TAYLOR, LLP**

/s/ Shella Borovinskaya

Pauline K. Morgan (No. 3650)
Andrew L. Magaziner (No. 5426)
Shella Borovinskaya (No. 6758)
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: pmorgan@ycst.com
amagaziner@ycst.com
sborovinskaya@ycst.com

- and -

**PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP**

Paul M. Basta (admitted *pro hac vice*)
Robert A. Britton (admitted *pro hac vice*)
Michael J. Colarossi (admitted *pro hac vice*)
1285 Avenue of the Americas
New York, New York 10019
Tel: (212) 373-3000
Fax: (212) 757-3990
Email: pbasta@paulweiss.com
rbritton@paulweiss.com
mcolarossi@paulweiss.com

*Proposed Counsel to the Debtors and
Debtors in Possession*