

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

In re Prodigy Investments Holding, Inc., ¹ Reorganized Debtor.	Chapter 11 Case No. 23-11120 (BLS) (Jointly Administered) Hearing Date: June 12, 2024 at 11:00 a.m. (ET) Objections Due: May 17, 2024 at 4:00 p.m. (ET)
Proterra Inc. and Proterra Operating Company Inc., Plaintiffs, v. Van Hool, N.V., Defendant.	Adv. No. 24-50014 (BLS)

JOINT MOTION TO WITHDRAW AS COUNSEL FOR CREDITOR VAN HOOL NV

The undersigned former counsel for Van Hool NV (“Van Hool”), respectfully request the Court to enter an order pursuant to Rule 9010-2(b) of the Local Rules for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”) permitting them to withdraw as counsel for Van Hool in the above-caption bankruptcy case (the “Bankruptcy Case”), as well as in Adversary Proceeding 24-50014-BLS (the “AP”). In support of this motion the undersigned state:

1. Local Rule 9010-2(b) provides that “no appearance shall be withdrawn except by order on a motion duly noticed to each party and served on the party client, at least fourteen (14)

¹ The Reorganized Debtor in this chapter 11 case, along with the last four digits of the Reorganized Debtor’s federal tax identification number, is: Prodigy Investment Holdings, inc. (9565). The location of the Reorganized Debtor’s service address is 3350 Virginia St., 2nd Floor, Miami, FL 33133.



days before the motion is presented, by registered or certified mail addressed to the client's last known address.”

2. Van Hool is a Belgian company that had contracts with the Debtor (the “Contracts”). The Debtor rejected the Contracts earlier in the Bankruptcy Case, and filed the AP against Van Hool, alleging that Van Hool owes the Debtor certain amounts for products delivered to Van Hool. The undersigned has been counsel for Van Hool during the pendency of the Bankruptcy Case and has entered appearances therein. Although the undersigned did not formally enter an appearance in the AP, they did enter into a stipulation with Debtor’s counsel regarding filing deadlines in the AP.

3. The undersigned has learned that Van Hool is in a bankruptcy liquidation proceeding in Belgium. As a result, Van Hool has instructed the undersigned counsel to withdraw from the Bankruptcy Case and the AP. The bankruptcy trustees for Van Hool have indicated that they do not wish to employ the undersigned to continue with any representation relating to the Bankruptcy Case or the AP.

4. The undersigned counsel have confirmed with Van Hool that they will seek to withdraw as counsel in the Bankruptcy Case and the AP. The undersigned counsel will also send a copy of this motion to Van Hool pursuant to Local Rule 9010-2(b).

WHEREFORE, the undersigned counsel respectfully requests the Court to enter an order permitting the undersigned to withdraw as counsel for Van Hool in the Bankruptcy Case and the AP.

DATED this 3rd day of May 2024.

Respectfully submitted,

/s/ Ericka F. Johnson

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Attorneys for Van Hool NV

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Proterra Inc. and Proterra Operating Company Inc., Plaintiffs, v. Van Hool, N.V., Defendant.	 Adv. No. 24-50014 (BLS)

**NOTICE OF JOINT MOTION TO WITHDRAW
AS COUNSEL FOR CREDITOR VAN HOOL NV**

PLEASE TAKE NOTICE that on May 3, 2024, counsel to Creditor Van Hool NV, filed the *Joint Motion to Withdraw as Counsel for Creditor to Van Hool NV* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware.

PLEASE TAKE FURTHER NOTICE that any objections or responses to the Motion must be in writing, filed with the Clerk of the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon the undersigned counsel on or before **May 17, 2024 at 4:00 p.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Motion, if required,

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will be held before the Honorable Brendan L. Shannon, United States Bankruptcy Judge for the District of Delaware, at the Bankruptcy Court, 824 North Market Street, 6th Floor, Courtroom No. 1, Wilmington, Delaware 19801 on **June 12, 2024, at 11:00 a.m. (ET) (prevailing Eastern Time)**.

IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

DATED this 3rd day of May 2024.

Respectfully submitted,

/s/ Ericka F. Johnson

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Attorneys for Van Hool NV

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**ORDER GRANTING JOINT MOTION
TO WITHDRAW AS COUNSEL FOR CREDITOR VAN HOOL NV**

Upon consideration of the Joint Motion of Bayard, P.A. and Bass, Berry & Sims PLC for Leave to Withdraw as Counsel for Van Hool, NV (the "Motion"),¹ it is hereby

ORDERED that the Motion is GRANTED; and

IT IS FURTHER ORDERED that Bayard, P.A. and Bass, Berry & Sims PLC are permitted to withdraw as counsel for Van Hool, NV in the Bankruptcy Case and AP, effective the date of the filing of the Motion.

¹ Capitalized terms used herein, but not defined herein shall have the meaning ascribed such terms in the Motion.

CERTIFICATE OF SERVICE

I, Ericka F. Johnson, hereby certify that on May 3, 2024, a true and correct copy of the foregoing was caused to be served via the Court's CM/ECF system on all parties authorized to receive electronic notice in this case and upon the parties listed below via electronic mail or registered mail, where indicated:

Via Registered Mail and Electronic Mail

Van Hool NV
Bernard Van Hoolstraat 58
2500 Lier (Koningshooikt)
Belgium
Email: jaesuk.vanwijngaerden@vanhool.com

Via Electronic Mail

Paul, Weiss, Rifkind, Wharton & Garrison LLP
Attn. Paul Basta, Robert Britton
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Young Conaway Stargatt & Taylor LLP
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The Office of the United States Trustee
for the District of Delaware
Attn: Linda J. Casey
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/s/ Ericka F. Johnson

Ericka F. Johnson, Esq. (No. 5024)