

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

Prodigy Investment Holdings, Inc.,¹

Reorganized Debtor.

Chapter 11

Case No. 23-11120 (BLS)

Jointly Administered

Re: Docket No. 1424

**ORDER SUSTAINING THE DISTRIBUTION TRUSTEE'S THIRD OMNIBUS
(SUBSTANTIVE) OBJECTION TO CERTAIN (I) MISCLASSIFIED CLAIMS, (II)
OVERSTATED AND MISCLASSIFIED CLAIMS, (III) OVERSTATED CLAIMS, AND
(IV) NO LIABILITY CLAIMS**

Upon the objection (the “Objection”)² of Steven Balasiano, in his capacity as the distribution trustee (the “Distribution Trustee”) of the PTR A Distribution Trust (the “Distribution Trust”) established in the above-captioned chapter 11 case (the “Chapter 11 Case”) of the reorganized debtor (“Prodigy” or the “Reorganized Debtor”), to certain proofs of claim filed by the claimants (the “Claimants”) on Schedule 1 (the “Misclassified Claims”), Schedule 2 (the “Overstated and Misclassified Claims”), Schedule 3 (the “Overstated Claims”), and Schedule 4 (the “No Liability Claims,” and together with the Misclassified Claims, the Overstated and Misclassified Claims, the Overstated Claims, and the No Liability Claims, the “Disputed Claims”); and this Court having reviewed the Objection and the Balasiano Declaration; and this Court having determined that the relief requested in the Objection is in the best interests of the Distribution Trustee, the Distribution Trust, the Reorganized Debtor, its estate, its creditors, and other parties

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 Investments Holdings, Inc. (9565). The location of the Reorganized Debtor’s service address is: 3350 Virginia St., 2nd Floor, Miami, FL 33133.

² Capitalized terms not defined herein shall have the meanings ascribed to them in the Objection.



in interest and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and this Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 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 as of February 29, 2012; and consideration of the Objection and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b)(2); and this Court having authority to enter a final order consistent with Article III of the United States Constitution; and venue being proper before this Court under 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Objection has been given and that no other or further notice is necessary; and upon all of the proceedings before this Court; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on the merits.
3. Each of the Misclassified Claims listed under the column titled “Claim Number” on the attached Schedule 1 is hereby reclassified and modified in accordance with the column titled “Reclassified Claim.” The Misclassified Claims listed in the column titled “Reclassified Claim” on the attached Schedule 1 shall remain on the Claims Register as modified, unless such Misclassified Claims are otherwise disallowed and/or modified by this Order or another order of this Court, subject to the Distribution Trustee’s, or any other parties’ further objections on any substantive or non-substantive grounds.
4. Each of the Overstated and Misclassified Claims listed under the column titled

“Claim Number” on the attached Schedule 2 is hereby reduced, reclassified, and modified in accordance with the columns titled “Modified Claim.” The Overstated and Misclassified Claims listed in the column titled “Modified Claim” on the attached Schedule 2 shall remain on the Claims Register as modified, unless such Overstated and Misclassified Claims are otherwise disallowed and/or modified by this Order or another order of this Court, subject to the Distribution Trustee’s, or any other parties’ further objections on any substantive or non-substantive grounds.

5. Each of the Overstated Claims listed under the column titled “Claim Number” on the attached Schedule 3 is hereby reduced and modified in accordance with the columns titled “Modified Claim.” The Overstated Claims listed in the column titled “Modified Claim” on the attached Schedule 3 shall remain on the Claims Register as modified, unless such Overstated Claims are otherwise disallowed and/or modified by this Order or another order of this Court, subject to the Distribution Trustee’s, or any other parties’ further objections on any substantive or non-substantive grounds.

6. The No Liability Claims listed on the attached Schedule 4 are disallowed and expunged in their entirety.

7. Notwithstanding Local Rule 3007-1(f)(iii), the rights of the Distribution Trustee or any other party to: (i) file subsequent objections to any claims listed on any of the Schedules annexed hereto on any ground, substantive or non-substantive (as permitted by the Court); (ii) amend, modify or supplement the Objection, including, without limitation, filing objections to further amended or newly-filed claims; (iii) seek to expunge or reduce any claim to the extent all or a portion of such claim has been paid; and (iv) settle any claim for less than the asserted amount, are expressly preserved. Additionally, should one or more of the grounds for objection stated in the Objection be overruled, the Distribution Trustee’s and any other parties’ rights to object to the

Remaining Claims on any other grounds are preserved. For the avoidance of doubt, leave from the requirements of Local Rule 3007-1(f)(iii) is hereby granted.

8. The objection to each claim, as addressed in the Objection and as set forth in the attached Schedules, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014 and Local Rule 3007-1. This Order shall be deemed a separate order with respect to each such claim that is the subject of the Objection. Any stay of this Order pending appeal by any Claimants whose claims are subject to this Order shall only apply to the contested matter that involves such Claimant and shall not act to stay the applicability and/or finality of this Order with respect to any other contested matters addressed in the Objection and this Order.

9. Verita is authorized and directed to modify the Claims Register to comport with the relief granted by this Order.

10. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Distribution Trustee or any other party may have to enforce rights against the Claimants, including but not limited to any right of setoff.

11. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

12. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Order.

Dated: November 26th, 2024
Wilmington, Delaware


BRENDAN L. SHANNON
UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1

Misclassified Claims

Prodigy Investment Holdings, Inc., et al., (f/k/a Proterra Inc)
Case No. 23-11120 (BLS)

Schedule 1 - Misclassified Claims

SEQ. NO.	NAME OF CLAIMANT	DATE FILED	DEBTOR NAME	CLAIM NUMBER	ASSERTED CLAIM CLASSIFICATION STATUS	RECLASSIFIED CLAIM	REASON FOR MODIFICATION
1	Argo Partners as Transferee of Kenwin Associates, LLC	8/29/2023	Proterra Operating Company, Inc. 23-11121	60	Administrative: \$50,000.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$0.00 Total Claim Amount \$50,000.00	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$50,000.00 Total Claim Amount \$50,000.00	Claim is for prepetition services, which are not entitled to priority status under section 503(b)(9) of the Bankruptcy Code. As such, Claim should be reclassified as a non-priority general unsecured claim.
2	Clean Tracks LLC	8/31/2023	Proterra Inc. 23-11120	70	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$1,210.00 General Unsecured: \$0.00 Total Claim Amount \$1,210.00	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$1,210.00 Total Claim Amount \$1,210.00	Claim is for prepetition services, which are not entitled to priority status under section 507(b)(4) of the Bankruptcy Code. Claim is not a claim by a current or former employee of the Debtors. As a result, the claim is not entitled to priority, and should be reclassified as a general unsecured claim.
3	Fariant Advisors LLC	10/10/2023	Proterra Inc. 23-11120	205	Administrative: \$14,001.25 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$0.00 Total Claim Amount \$14,001.25	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$14,001.25 Total Claim Amount \$14,001.25	Claim is for prepetition services, which are not entitled to priority status under section 503(b)(9) of the Bankruptcy Code. As such, the Claim should be reclassified as a non-priority general unsecured claim.
4	John Effrid Company	9/18/2023	Proterra Inc. 23-11120	134	Administrative: \$560.50 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$0.00 Total Claim Amount \$560.50	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$560.50 Total Claim Amount \$560.50	Claim is for prepetition services, which are not entitled to priority status under section 503(b)(9) of the Bankruptcy Code. As such, the Claim should be reclassified as a non-priority general unsecured claim.
5	Lock Midge Tool Company Inc.	10/31/2023	Proterra Operating Company, Inc. 23-11121	674	Administrative: \$12,261.11 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$0.00 Total Claim Amount \$12,261.11	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$12,261.11 Total Claim Amount \$12,261.11	Claim is for prepetition goods received by the Debtors outside of the section 503(b)(9) 20-day window, which are not entitled to priority status under section 503(b)(9) of the Bankruptcy Code. As such, the Claim should be reclassified as a non-priority general unsecured claim.
6	Project Genetics LLC	9/11/2023	Proterra Operating Company, Inc. 23-11121	104	Administrative: \$7,631.25 Secured: \$0.00 Priority Unsecured: \$28,027.50 General Unsecured: \$0.00 Total Claim Amount \$35,658.75	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$35,658.75 Total Claim Amount \$35,658.75	Portion of the Claim sought to be reclassified is for prepetition services, which are not entitled to priority status under section 503(b)(9) of the Bankruptcy Code. As such, that portion of the Claim should be reclassified as a non-priority general unsecured claim.
7	Quanta Laboratories	9/15/2023	Proterra Operating Company, Inc. 23-11121	130	Administrative: \$1,100.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$0.00 Total Claim Amount \$1,100.00	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$1,100.00 Total Claim Amount \$1,100.00	Claim is for prepetition services, which are not entitled to priority status under section 503(b)(9) of the Bankruptcy Code. As such, Claim should be reclassified as a non-priority general unsecured claim.
8	RELX Inc. dba LexisNexis	10/03/2023	Proterra Operating Company, Inc. 23-11121	186	Administrative: \$15,950.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$0.00 Total Claim Amount \$15,950.00	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$15,950.00 Total Claim Amount \$15,950.00	Claim is for prepetition services, which are not entitled to priority status under section 503(b)(9) of the Bankruptcy Code. As such, Claim should be reclassified as a non-priority general unsecured claim.
9	Silvaaz, Miguel	11/27/2023	Proterra Inc. 23-11120	1219	Administrative: \$26,188.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$0.00 Total Claim Amount \$26,188.00	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$26,188.00 Total Claim Amount \$26,188.00	Claim is for prepetition services, which are not entitled to priority status under section 503(b)(9) of the Bankruptcy Code. Claim is not a claim by a current or former employee of the Debtors. As a result, the claim should be reclassified as a non-priority general unsecured claim.

SEQ. NO.	NAME OF CLAIMANT	DATE FILED	DEBTOR NAME	CLAIM NUMBER	ASSERTED CLAIM CLASSIFICATION STATUS	RECLASSIFIED CLAIM	REASON FOR MODIFICATION
10	Tech Graphics Private Limited	9/7/2023	Proterra Operating Company, Inc. 23-11121	160	Administrative: \$14,700.00 Secured: \$0.00 Priority Unsecured: \$15,000.00 General Unsecured: \$0.00 Total Claim Amount: \$29,700.00	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$29,700.00 Total Claim Amount: \$29,700.00	Portion of the Claim is for prepetition services, which are not entitled to priority status under section 507(a)(4) of the Bankruptcy Code. No portion of the Claim is a claim by a current or former employee of the Debtors. As a result, this portion of the Claim is not entitled to priority status under section 507(a)(4) of the Bankruptcy Code. As such, this portion of the Claim asserts priority for prepetition services, which are not entitled to priority status under section 507(a)(4) of the Bankruptcy Code. As such, that portion of the Claim should be reclassified as a non-priority general unsecured claim.
11	Volk, Tatyana	11/7/2023	Proterra Inc. 23-11120	658	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$4,143.75 General Unsecured: \$0.00 Total Claim Amount: \$4,143.75	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$4,143.75 Total Claim Amount: \$4,143.75	Claim is for prepetition services, which are not entitled to priority status under section 507(a)(4) of the Bankruptcy Code. Claim is not a claim by a current or former employee of the Debtors. As a result, the Claim is not entitled to priority, and should be reclassified as a general unsecured claim.
12	Wurth-Electronics KS Inc.	10/17/2023	Proterra Operating Company, Inc. 23-11121	283	Administrative: \$23,382.56 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$4,715.67 Total Claim Amount: \$28,101.23	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$28,101.23 Total Claim Amount: \$28,101.23	Portion of the Claim in the amount of \$16,075.68 are for prepetition goods received by the Debtors outside of the section 503(b)(9) 20-day window, which are not entitled to priority status under section 503(b)(9) of the Bankruptcy Code. As such, that portion of the Claim should be reclassified as a general unsecured claim.
13	Zing	8/16/2023	Proterra Inc. 23-11120	12	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$51,596.18 General Unsecured: \$0.00 Total Claim Amount: \$51,596.18	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$51,596.18 Total Claim Amount: \$51,596.18	Claim is for prepetition services, which are not entitled to priority status under section 507(a)(4) of the Bankruptcy Code. Claim is not a claim by a current or former employee of the Debtors. As a result, the Claim is not entitled to priority, and should be reclassified as a general unsecured claim.
Total					\$270,470.77	\$270,470.77	

SCHEDULE 2

Overstated and Misclassified Claims

Prodigy Investment Holdings, Inc., et al., (f/k/a Proterra Inc)
Case No. 23-11120 (BLS)

Schedule 2 - Overstated & Misclassified Claims

SEQ. NO.	NAME OF CLAIMANT	DATE FILED	DEBTOR NAME	CLAIM NUMBER	ASSERTED CLAIM	MODIFIED CLAIM	REASON FOR MODIFICATION
1	Ace Vending Company	10/21/2023	Proterra Inc. 23-11120	393	Administrative: Secured: \$25,319.25 Priority Unsecured: \$0.00 General Unsecured: \$0.00 Total Claim Amount: \$25,319.25	Administrative: \$25,319.25 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$0.00 Total Claim Amount: \$25,319.25	Portion of the Claim is for prepetition goods sold in the amount of \$21,826.25 that were received by the Debtors outside of the section 503(b)(9) 20-day window, which are not entitled to priority status under section 503(b)(9) of the Bankruptcy Code. As such, this portion of the Claim should be reclassified as a non-priority general unsecured claim. According to the Books and Records, a portion of the administrative Claim was paid in the amount of \$3,493.00. Accordingly, the Claim should be reduced and reclassified as a general unsecured claim in the amount of \$21,826.25.
2	Addison Group DBA CVPartners	8/16/2023	Proterra Inc. 23-11120	7	Administrative: Secured: \$53,403.90 Priority Unsecured: \$0.00 General Unsecured: \$15,150.00 Total Claim Amount: \$80,419.50	Administrative: \$53,403.90 Secured: \$0.00 Priority Unsecured: \$15,150.00 General Unsecured: \$11,865.60 Total Claim Amount: \$80,419.50	Portion of the Claim is for prepetition services, but improperly asserts priority under section 503(b)(9) of the Bankruptcy Code. As a result, the Claim is not entitled to priority, and should be reclassified as a general unsecured claim. According to the Books and Records, a portion of the administrative Claim was paid in the amount of \$35,381.95. Accordingly, the Claim should be reduced and reclassified as a general unsecured claim in the amount of \$45,037.44.
3	Bentech Inc	11/22/2023	Proterra Operating Company, Inc. 23-11121	1206	Administrative: Secured: \$242,481.39 Priority Unsecured: \$0.00 General Unsecured: \$0.00 Total Claim Amount: \$242,481.39	Administrative: \$242,481.39 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$0.00 Total Claim Amount: \$242,481.39	Portion of the Claim is for prepetition goods sold in the amount of \$204,121.88 that were received by the Debtors outside of the section 503(b)(9) 20-day window, which are not entitled to priority status under section 503(b)(9) of the Bankruptcy Code. As such, this portion of the Claim should be reclassified as a non-priority general unsecured claim. According to the Books and Records, Claimant was paid \$38,008.63. The Books and Records do not contain support for a remaining section 503(b)(9) administrative Claim balance in the aggregate amount of \$300.88. Accordingly, the Claim should be reduced and reclassified as a non-priority general unsecured claim in the amount of \$204,121.88.
4	Comer Foods	8/18/2023	Proterra Inc. 23-11120	45	Administrative: Secured: \$33,194.96 Priority Unsecured: \$0.00 General Unsecured: \$4,844.99 Total Claim Amount: \$38,039.95	Administrative: \$33,194.96 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$4,844.99 Total Claim Amount: \$38,039.95	According to the Books and Records, Claimant received a cure payment in the amount of \$17,947.82, of which \$5,445.88 was for the section 503(b)(9) administrative expense portion of the Claim and \$13,578.84 was for the general unsecured portion of the Claim. According to the Books and Records, Claimant received an additional payment on account of the section 503(b)(9) portion of the Claim in the amount of \$6,391.12. Accordingly, the Claim should be reduced and reclassified as a non-priority general unsecured claim in the amount of \$12,624.11.
5	Euler-Hermes Agent for USSC GROUP, INC.	10/24/2023	Proterra Inc. 23-11120	467	Administrative: Secured: \$36,241.34 Priority Unsecured: \$0.00 General Unsecured: \$0.00 Total Claim Amount: \$36,241.34	Administrative: \$36,241.34 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$0.00 Total Claim Amount: \$36,241.34	Portion of the Claim is for prepetition goods in the amount of \$32,188.00 that were received by the Debtors outside of the section 503(b)(9) 20-day window, which are not entitled to priority status under section 503(b)(9) of the Bankruptcy Code. As such, this portion of the Claim should be reclassified as a general unsecured claim. Another portion of the Claim is for prepetition goods in the amount of \$4,053.34 that were received by the Debtors within the section 503(b)(9) 20-day window. According to the Books and Records, Claimant was paid \$4,053.34 on account of the section 503(b)(9) administrative expense Claim. Accordingly, the Claim should be reduced and reclassified as a non-priority general unsecured claim in the amount of \$32,188.00.

SEQ. NO.	NAME OF CLAIMANT	DATE FILED	DEBTOR NAME	CLAIM NUMBER	ASSERTED CLAIM	MODIFIED CLAIM	REASON FOR MODIFICATION
6	Hahn Capital Investors Master Fund, LTD as Transferee of NSK Industries	10/26/2023	Proterra Operating Company, Inc. 23-11121	531	Administrative: Secured: <u>Priority Unsecured:</u> <u>General Unsecured:</u> Total Claim Amount	\$22,307.00 Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: <u>\$23,510.12 General Unsecured:</u> \$45,817.12 Total Claim Amount	\$0.00 \$0.00 \$0.00 <u>\$23,477.12</u> \$23,477.12 According to the Books and Records, Claimant was paid \$22,055.00 on account of the section 503(b)(9) administrative expense claim. Claimant was also paid \$285.00 on account of the general unsecured claim. Accordingly, the Claim should be reduced and reclassified as a general unsecured claim in the amount of \$23,477.12
7	HARSCO RAIL, LLC.	10/16/2023	Proterra Inc. 23-11120	284	Administrative: Secured: <u>Priority Unsecured:</u> <u>General Unsecured:</u> Total Claim Amount	\$3,474.00 Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: <u>\$0.00 General Unsecured:</u> \$3,474.00 Total Claim Amount	\$0.00 \$0.00 \$0.00 <u>\$474.00</u> \$474.00 Another portion of the Claim is for prepetition goods in the amount of \$3,000.00 that were received by the Debtors within the section 503(b)(9) 20-day window. According to the Books and Records, Claimant was paid \$3,000.00 on account of the section 503(b)(9) administrative expense claim. Accordingly, the Claim should be reclassified as a general unsecured claim in the amount of \$474.00.
8	Laserform and Machine, Inc.	9/13/2023	Proterra Operating Company, Inc. 23-11121	115	Administrative: Secured: <u>Priority Unsecured:</u> <u>General Unsecured:</u> Total Claim Amount	\$40,028.21 Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: <u>\$53,907.34 General Unsecured:</u> \$93,935.55 Total Claim Amount	\$0.00 \$0.00 \$0.00 <u>\$54,564.56</u> \$54,564.56 Another portion of the Claim is for prepetition goods in the amount of \$38,658.99 that were received by the Debtors. According to the Books and Records, Claimant has been paid \$38,658.99 on account of the section 503(b)(9) administrative expense claim. Additionally, the Books and Records do not include support for a remaining administrative claim in the amount of \$1,309.12. Accordingly, the Claim should be reduced and reclassified as a non-priority general unsecured claim in the amount of \$54,564.56.
9	M1 Graphics Co., Inc.	08/23/2023	Proterra Operating Company, Inc. 23-11121	54	Administrative: Secured: <u>Priority Unsecured:</u> <u>General Unsecured:</u> Total Claim Amount	\$853.20 Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: <u>\$0.00 General Unsecured:</u> \$853.20 Total Claim Amount	\$0.00 \$0.00 \$0.00 <u>\$178.20</u> \$178.20 Another portion of the Claim is for prepetition goods in the amount of \$675.00 that were received by the Debtors. According to the Books and Records, Claimant has been paid \$675.00 on account of the section 503(b)(9) administrative expense claim. Accordingly, the Claim should be reduced and reclassified as a non-priority general unsecured claim in the amount of \$178.20.
10	Watson Engineering Inc.	11/10/2023	Proterra Operating Company, Inc. 23-11121	1004	Administrative: Secured: <u>Priority Unsecured:</u> <u>General Unsecured:</u> Total Claim Amount	\$57,843.10 Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: <u>\$406,026.17 General Unsecured:</u> \$463,869.27 Total Claim Amount	\$53,359.70 \$0.00 \$0.00 <u>\$406,386.57</u> \$459,746.27 Another portion of the Claim is for prepetition goods in the amount of \$4,123.00 that were received by the Debtors within the section 503(b)(9) 20-day window. According to the Books and Records, Claimant has been paid \$4,123.00 on account of the section 503(b)(9) administrative expense claim. Accordingly, the section 503(b)(9) administrative expense portion of the Claim should be reduced to \$53,359.70 and the remaining portion of the Claim in the amount of \$466,386.57 should be reclassified as a general unsecured claim.

SCHEDULE 3

Overstated Claims

Prodigy Investment Holdings, Inc., et al. (f/k/a Proterra Inc)
Case No. 23-11120 (BLS)

Schedule 3 - Overstated Claims

SEQ. NO.	NAME OF CLAIMANT	DEBTOR NAME	DATE FILED	CLAIM NUMBER	ASSERTED CLAIM	MODIFIED CLAIM	REASON FOR MODIFICATION
1	Advanced Wheel Sales, LLC	Proterra Inc 23-11120	10/17/2023	258	Administrative: \$116,630.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$21,172.00 Total Claim Amount \$137,702.00	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$21,172.00 Total Claim Amount \$21,172.00	According to the Books and Records, a portion of the Claim is for returned and credited goods in the amount of \$2,310.00, which are not entitled to section 503(b)(9) administrative claim status under the Bankruptcy Code. Additionally, the Books and Records reflect that the Claimant has been paid \$114,220.00 on account of the section 503(b)(9) administrative portion of the Claim. Accordingly, the Claim should be reduced to the general unsecured claim amount of \$21,172.00.
2	Altro USA, Inc.	Proterra Operating Company, Inc. 23-11121	8/18/2023	39	Administrative: \$2,838.87 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$21,303.00 Total Claim Amount \$24,141.87	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$21,303.00 Total Claim Amount \$21,303.00	A portion of the Claim is a \$2,838.87 section 503(b)(9) administrative claim for goods that were received by the Debtors within the section 503(b)(9) 20-day window. According to the Books and Records, Claimant has been paid \$2,838.87 on account of the section 503(b)(9) administrative portion of the Claim. Accordingly, the Claim should be reduced to the general unsecured claim amount of \$21,303.00.
3	Digi-Key Electronics	Proterra Operating Company, Inc. 23-11121	8/28/2023	47	Administrative: \$1,969.79 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$4,222.53 Total Claim Amount \$6,192.32	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$4,222.53 Total Claim Amount \$4,222.53	A portion of the Claim is a \$1,969.79 section 503(b)(9) administrative claim for goods that were received by the Debtors within the section 503(b)(9) 20-day window. According to the Books and Records, Claimant has been paid \$1,969.79 on account of the section 503(b)(9) administrative portion of the Claim. Accordingly, the Claim should be reduced to the general unsecured claim amount of \$4,222.53.
4	ILR, LLC D/B/A All City Tow Service	Proterra Operating Company, Inc. 23-11121		190	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$86,547.85 General Unsecured: \$86,547.85 Total Claim Amount \$173,095.70	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$64,380.00 Total Claim Amount \$64,380.00	According to the Books and Records, a portion of the Claim was paid in the amount of \$44,334.00. Accordingly, the Claim should be reduced to the general unsecured claim \$64,380.
5	Kolors By Keisler, LLC	Proterra Inc 23-11120	9/11/2023	302	Administrative: \$50,364.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$119,646.00 Total Claim Amount \$170,010.00	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$119,646.00 Total Claim Amount \$119,646.00	A portion of the Claim is a \$50,364.00 section 503(b)(9) administrative claim for goods that were received by the Debtors within the section 503(b)(9) 20-day window. According to the Books and Records, Claimant has been paid \$49,900.00 on account of the section 503(b)(9) administrative portion of the Claim. The Books and Records do not support the remaining asserted administrative section 503(b)(9) claim balance in the amount of \$464.00. Accordingly, the Claim should be reduced to the general unsecured claim amount of \$119,646.00.
6	Lucerik International Corporation	Proterra Operating Company, Inc. 23-11121	10/5/2023	198	Administrative: \$210.10 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$7,624.08 Total Claim Amount \$7,834.18	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$7,624.08 Total Claim Amount \$7,624.08	A portion of the Claim is a \$210.10 section 503(b)(9) administrative claim for goods that were received by the Debtors within the section 503(b)(9) 20-day window. According to the Books and Records, Claimant has been paid \$210.10 on account of the section 503(b)(9) administrative portion of the Claim. Accordingly, the Claim should be reduced as a general unsecured claim in the amount of \$7,624.08.
7	Romeo RIM, Inc.	Proterra Operating Company, Inc. 23-11121	8/29/2023	37	Administrative: \$37,791.12 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$57,592.60 Total Claim Amount \$95,383.72	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$57,592.60 Total Claim Amount \$57,592.60	A portion of the Claim is a \$37,791.12 section 503(b)(9) administrative claim for goods that were received by the Debtors within the section 503(b)(9) 20-day window. According to the Books and Records, Claimant has been paid \$37,791.12 on account of the section 503(b)(9) administrative portion of the Claim. Accordingly, the Claim should be reduced to the general unsecured claim amount of \$57,592.60.
8	Sportworks Global LLC	Proterra Inc 23-11120	9/6/2023	92	Administrative: \$10,285.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$26,197.60 Total Claim Amount \$36,482.60	Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$26,197.60 Total Claim Amount \$26,197.60	A portion of the Claim is a \$10,285.00 section 503(b)(9) administrative claim for goods that were received by the Debtors within the section 503(b)(9) 20-day window. According to the Books and Records, Claimant has been paid \$10,285.00 on account of the section 503(b)(9) administrative portion of the Claim. Accordingly, the Claim should be reduced to the general unsecured claim of \$26,197.60.

SCHEDULE 4

No Liability Claims

Prodigy Investment Holdings, Inc., et al., (f/k/a Proterra Inc)
Case No. 23-11120 (BLS)

Schedule 4 - No Liability Claims

SEQ. NO.	NAME OF CLAIMANT	DATE FILED	DEBTOR NAME	CLAIM NUMBER	ASSERTED CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	Argo Partners as Transferer of Capelin Solutions LLC	11/13/2023	Proterra Operating Company, Inc. 23-11121	1106	Administrative: Secured: Priority Unsecured: \$77,310.00 <u>General Unsecured: \$77,310.00</u> Total Claim Amount: \$77,310.00	The Debtors' contract with the Claimant was assumed and assigned and the Claimant was paid the cure costs totaling \$77,310.00. See D.I. 880. As such, the Distribution Trustee has no liability for the Claim.
2	Bizlink Technology, Inc.	10/11/2023	Proterra Operating Company, Inc. 23-11121	211	Administrative: \$291,856.51 Secured: Priority Unsecured: <u>General Unsecured:</u> Total Claim Amount: \$291,856.51	Claimant asserts an administrative section 503(b)(9) claim in the amount of \$291,856.51 for goods that were received by the Debtors. According to the Books and Records, Claimant has been paid on account of the administrative claims. As such, no balance is due on the administrative section 503(b)(9) claim and the Distribution Trustee has no liability for the Claim.
3	Capelin Solutions LLC	11/13/2023	Proterra Operating Company, Inc. 23-11121	1106	Administrative: \$13,788.4 Secured: Priority Unsecured: <u>General Unsecured:</u> Total Claim Amount: \$13,788.4	The Debtors' contract with the Claimant was assumed and assigned and the Claimant was paid the cure costs totaling \$77,310.00. See D.I. 880. As such, the Distribution Trustee has no liability for the Claim.
4	Colorado Department of Revenue	10/23/2023	Proterra Operating Company, Inc. 23-11121	421	Administrative: Secured: Priority Unsecured: \$1,913.86 <u>General Unsecured:</u> Total Claim Amount: \$1,913.86	Claimant asserts a \$1,913.86 Claim for Sales & Use Tax for the tax quarter ending 9/30/2023. According to the Books and Records, the Actual Tax amount due on the Sales & Use Tax return has been paid. Accordingly, no balance is due on the priority unsecured claim and the Distribution Trustee has no liability for the Claim.
5	Engineered Machined Products, Inc.	10/6/2023	Proterra Inc. 23-11120	200	Administrative: \$47,520.00 Secured: Priority Unsecured: <u>General Unsecured:</u> Total Claim Amount: \$47,520.00	Claimant asserts \$47,520.00 section 503(b)(9) administrative claim for goods that were received by the Debtors within the section 503(b)(9) 20-day window. According to the Books and Records, Claimant has been paid on account of the administrative Claim. As such, no balance is due on the administrative section 503(b)(9) claim and the Distribution Trustee has no liability for the Claim.

SEQ. NO.	NAME OF CLAIMANT	DATE FILED	DEBTOR NAME	CLAIM NUMBER	ASSERTED CLAIM AMOUNT	REASON FOR DISALLOWANCE
6	Heiland Electronics, Inc.	10/31/2023	Proterra Inc. 23-11120	639	Administrative: \$223,223.2 Secured: Priority Unsecured: <u>General Unsecured: \$414,470.00</u> Total Claim Amount: \$223,637.67	The Debtors' contract with the Claimant was assumed and assigned and the Claimant was paid the cure costs totaling \$214,259.46. See D.I. 880. As such, the Distribution Trustee has no liability for the Claim.
7	Seifert Graphics, Inc.	9/22/2023	Proterra Operating Company, Inc. 23-11121	154	Administrative: \$118,096.83 Secured: Priority Unsecured: <u>General Unsecured:</u> Total Claim Amount: \$118,096.83	The Debtors' contract with the Claimant was assumed and assigned and the Claimant was paid the cure costs totaling \$316,923.98. See D.I. 880. As such, the Distribution Trustee has no liability for the Claim.
8	Seifert Graphics, Inc.	9/22/2023	Proterra Operating Company, Inc. 23-11121	454	Administrative: Secured: Priority Unsecured: <u>General Unsecured: \$328,825.88</u> Total Claim Amount: \$328,825.88	The Debtors' contract with the Claimant was assumed and assigned and the Claimant was paid the cure costs totaling \$316,923.98. See D.I. 880. As such, the Distribution Trustee has no liability for the Claim.
9	Sigma Machine, Inc.	11/13/2023	Proterra Operating Company, Inc. 23-11121	1046	Administrative: \$872,750.00 Secured: Priority Unsecured: <u>General Unsecured: \$912,936.65</u> Total Claim Amount: \$1,785,686.65	The Debtors' contract with the Claimant was assumed and assigned and the Claimant was paid the cure costs, \$1,262,476.78. See D.I. 880. As such, the Distribution Trustee has no liability for the Claim.
10	Softchoice Corp.	9/28/2023	Proterra Operating Company, Inc. 23-11121	177	Administrative: \$3,495.00 Secured: Priority Unsecured: <u>General Unsecured: \$25.24</u> Total Claim Amount: \$3,520.24	Claimant asserts a \$3,495.00 administrative section 503(b)(9) claim and a \$25.24 general unsecured claim for goods that were received by the Debtors outside of the section 503(b)(9) 20-day window. According to the Books and Records, Claimant has been paid on account of the administrative and general unsecured claims. As such, no balance is due on either the administrative or general unsecured claims and the Distribution Trustee has no liability for the Claim.