

**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. 1445

**CERTIFICATION OF COUNSEL REGARDING REVISED ORDER SUSTAINING
THE DISTRIBUTION TRUSTEE'S FOURTH OMNIBUS (NON-SUBSTANTIVE)
OBJECTION TO CERTAIN (I) AMENDED AND SUPERSEDED CLAIMS,
(II) DUPLICATE CLAIMS, (III) LATE FILED CLAIMS, AND
(IV) INSUFFICIENT DOCUMENTATION CLAIMS**

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”) by and through his respective undersigned counsel, hereby certify as follows:

1. On October 15, 2024, the Distribution Trustee filed *The Distribution Trustee's Fourth Omnibus (Non-Substantive) Objection to Certain (I) Amended and Superseded Claims, (II) Duplicate Claims, (III) Late Filed Claims, and (IV) Insufficient Documentation Claims* [Docket No. 1445] (the “Objection”) with the United States Bankruptcy Court for the District of Delaware (the “Court”). The notice filed with the Objection established a deadline of November 13, 2024 at 4:00 p.m. (ET) (the “Objection Deadline”) to respond to the Objection. A hearing on the Objection was held on November 20, 2024 at 1:30 p.m. (ET) (the “Hearing”).

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. On November 13, 2024 Sonam Lama filed a response to the Objection with respect to claim number 1336. [Docket No. 1463]. On November 19, 2024, Sonam Lama filed a supplemental response to the Objection also with respect to claim number 1336. [Docket No. 1468].

3. At the Hearing, the Court overruled the responses filed by Sonam Lama to the Objection.

4. At the request of the Court, the Distribution Trustee has revised the proposed order to reflect the removal of claim number 1327 filed by Transit Authority of River City from the proposed order pending adjournment of the hearing on the Objection to that claim to January 15, 2024 at 10:00 a.m. (ET).

5. Attached hereto as **Exhibit A** is a revised proposed order sustaining the Objection. Attached hereto as **Exhibit B** is a redline of the revised proposed order against the proposed order filed with the Objection on October 15, 2024 at Docket Number 1445-2.

WHEREFORE, the Distribution Trustee respectfully requests that the proposed order attached hereto as Exhibit A be entered at the Court's earliest convenience.

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Dated: December 2, 2024

MORRIS JAMES LLP

/s/ Siena B. Cerra

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Counsel to the Distribution Trust

EXHIBIT A

Revised Order

**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. 1445

ORDER SUSTAINING THE DISTRIBUTION TRUSTEE’S FOURTH OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CERTAIN (I) AMENDED AND SUPERSEDED CLAIMS, (II) DUPLICATE CLAIMS, (III) LATE FILED CLAIMS, AND (IV) INSUFFICIENT DOCUMENTATION 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 “Amended Claims”), Schedule 2 (the “Duplicate Claims”), Schedule 3 (the “Late Filed Claims”), and Schedule 4 (the “Insufficient Documentation Claims,” and together with the Amended Claims, the Duplicate Claims, and the Late Filed 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 in interest and that the legal and factual bases set forth in

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.

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. The Amended Claims listed under the column titled “Amended Claim to be Disallowed” on the attached Schedule 1 are disallowed and expunged in their entirety. The claims listed under the column titled “Remaining Claim” on the attached Schedule 1 shall remain on the Claims Register, unless such Remaining Amended Claim is otherwise disallowed by this Order or another Order of this Court, subject the Distribution Trustee’s, or any other parties’ further objections on any substantive or non-substantive grounds.
4. The Duplicate Claims listed under the column titled “Duplicate Claim to be Disallowed” on the attached Schedule 2 are disallowed and expunged in their entirety. The claims listed under the column titled “Remaining Claim” on the attached Schedule 2 shall remain on the

Claims Register, unless such Remaining Duplicate Claim is otherwise disallowed by this Order or another Order of this Court, subject the Distribution Trustee's, or any other parties' further objections on any substantive or non-substantive grounds. In addition, to the extent the Duplicate Claims contain attachments that were not included with the Remaining Claims, such attachments shall be deemed to be attached to the Remaining Duplicate Claims.

5. The Late Filed Claims listed on the attached Schedule 3 are disallowed and expunged in their entirety.

6. The Insufficient Documentation 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.

SCHEDULE 1

Amended and Superseded Claims

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

Schedule 1 - Amended and Superseded Claims

	Name of Claimant	Remaining Claim	Remaining Claim Asserted Amount	Debtor for Remaining Claim	Amended Claim to be Disallowed	Disallowed Asserted Claim Amount	Debtor for Disallowed Claim	Reason For Disallowance
1	Missouri Department of Revenue	1406	Administrative: Secured: Priority Unsecured: \$1,278.64 General Unsecured: _____ Total Claim Amount \$1,278.64	Proterra Operating Company, Inc. 23-11121	1359	Administrative: \$1,762.64 Secured: Priority Unsecured: General Unsecured: _____ Total Claim Amount \$1,762.64	Proterra Operating Company, Inc. 23-11121	Claim No. 1406 amends and supersedes Claim No. 1359.
2	Missouri Department of Revenue	1409	Administrative: \$1,278.64 Secured: Priority Unsecured: General Unsecured: _____ Total Claim Amount \$1,278.64	Proterra Operating Company, Inc. 23-11121	1406	Administrative: Secured: Priority Unsecured: \$1,278.64 General Unsecured: _____ Total Claim Amount \$1,278.64	Proterra Operating Company, Inc. 23-11121	Claim No. 1409 amends and supersedes Claim No. 1406.

SCHEDULE 2

Duplicate Claims

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

Schedule 2 - Duplicate Claims

	Name of Claimant	Remaining Claim	Remaining Claim Asserted Amount		Debtor for Remaining Claim	Duplicate Claim to be Disallowed	Disallowed Asserted Claim Amount		Debtor for Disallowed Claim	Reason For Disallowance
1	Mobility Forefront LLC	1333	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	Unliquidated	Proterra Inc. 23-11120	1138	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	Unliquidated	Proterra Inc. 23-11120	Claimant filed multiple claims for the same liability or liabilities. The liability or liabilities included in the claim in the column "Duplicate Claim to be Disallowed" is duplicative of the liabilities contained in the claim in the column "Remaining Claim." The Duplicate Claim should be disallowed and expunged in its entirety. NOTE: Claim 1333 is also subject to objection as Contingent or Unliquidated. See Schedule 5.
			Total Claim Amount	Unliquidated			Total Claim Amount	Unliquidated		
2	Rhombus Energy Solutions, Inc.	1390	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$10,975.37 \$2,983.87 \$544,484.48	Proterra Inc. 23-11120	1389	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$10,975.37 \$2,983.87 \$544,484.48	Proterra Operating Company, Inc. 23-11121	Claimant filed multiple claims for the same liability or liabilities. The liability or liabilities included in the claim in the column "Duplicate Claim to be Disallowed" is duplicative of the liabilities contained in the claim in the column "Remaining Claim." The Duplicate Claim should be disallowed and expunged in its entirety.
			Total Claim Amount	\$558,443.72			Total Claim Amount	\$558,443.72		

SCHEDULE 3

Late Filed Claims

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

Schedule 3 - Late Filed Claims

	Name of Claimant	Claim Number	Date Claim was Filed	Claim Asserted Amount and Priority	Debtor	Reason For Disallowance
1	Digital Media Innovations LLC	1407	6/26/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$875.00 Total Claim Amount \$875.00	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023
2	SPAL USA	1405	6/4/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$57,432.13 Total Claim Amount \$57,432.13	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023
3	Atlas-Pellizzari Electric Inc.	1400	5/6/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$149,422.00 Total Claim Amount \$149,422.00	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023
4	Motion Industries	1399	4/30/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$4,289.79 Total Claim Amount \$4,289.79	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023
5	Suzhou Current Electric Limited Company	1396	4/26/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$150.78 Total Claim Amount \$150.78	Proterra Operating Company, Inc. 23-11121	Claim was filed after the applicable General Bar date of November 13, 2023
6	City of Wilsonville	1388	4/12/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$26,019.52 Total Claim Amount \$26,019.52	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023
7	Jet Garagae Inc.	1387	4/12/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$1,356.00 Total Claim Amount \$1,356.00	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023

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

Schedule 3 - Late Filed Claims

	Name of Claimant	Claim Number	Date Claim was Filed	Claim Asserted Amount and Priority		Debtor	Reason For Disallowance
8	Quad City Garage Policy Group	1377	4/11/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$2,832.03	Proterra Operating Company, Inc. 23-11121	Claim was filed after the applicable General Bar date of November 13, 2023
				Total Claim Amount	\$2,832.03		
9	Redding Area Bus Authroity	1337	3/19/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$2,359.50	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023
				Total Claim Amount	\$2,359.50		
10	Lama, Sonam	1336	3/16/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$9,415.00	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023 NOTE: Claim 1336 is also subject to objection as an Insufficient Document Claim. See Schedule 4.
				Total Claim Amount	\$9,415.00		
11	Element Materials Technology Detroit LLC	1309	2/23/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$2,735.00	Proterra Operating Company, Inc. 23-11121	Claim was filed after the applicable General Bar date of November 13, 2023
				Total Claim Amount	\$2,735.00		
12	TE Connectivity Corporation	1262	1/17/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$89,949.32	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023
				Total Claim Amount	\$89,949.32		

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

Schedule 3 - Late Filed Claims

	Name of Claimant	Claim Number	Date Claim was Filed	Claim Asserted Amount and Priority	Debtor	Reason For Disallowance
13	White Rock Mfg.	1255	1/10/2024	Administrative: Secured: Priority Unsecured: General Unsecured: \$141,595.53 Total Claim Amount \$141,595.53	Proterra Operating Company, Inc. 23-11121	Claim was filed after the applicable General Bar date of November 13, 2023
14	Qualtrics	1221	11/28/2023	Administrative: Secured: Priority Unsecured: General Unsecured: \$41,000.00 Total Claim Amount \$41,000.00	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023

SCHEDULE 4

Insufficient Documentation Claims

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

Schedule 4 - Insufficient Documentation Claims

	Name of Claimant	Claim Number	Claim Amount	Claim Priority	Debtor	Reason For Disallowance
1	Alaniz, Paul	545	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 545 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
2	Avina, Gabriel	1209	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 1209 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
3	Bajwa, Haider	765	\$490.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 765 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
4	Bluemle, Andreas	456	\$1,170.68	General Unsecured	Proterra Inc. 23-11120	Claim No. 456 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
5	Campanella, Peter	72	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 72 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
6	Cassilli, Joseph	340	\$500.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 340 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
7	Chang, Pamella	292	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 292 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
8	Cho, Nicholas	354	\$2,272.33	General Unsecured	Proterra Inc. 23-11120	Claim No. 354 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
9	Coultman, Craig	577	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 577 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.

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

Schedule 4 - Insufficient Documentation Claims

	Name of Claimant	Claim Number	Claim Amount	Claim Priority	Debtor	Reason For Disallowance
10	Fenton, Teal	440	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 440 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
11	Gainey, Timothy	1261	\$92.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 1261 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
12	Gnanamuttu, Anuran	766	\$551.34	General Unsecured	Proterra Inc. 23-11120	Claim No. 766 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
13	Gonzalez, Jaudiel	474	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 474 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
14	Graves, Jennie	1316	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 1316 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
15	Haltec Corporation	351	\$9,508.90	General Unsecured	Proterra Operating Company, Inc. 23-11121	Claim No. 351 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
16	Han, Sun W	1205	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 1205 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
17	Hopkins, Corey	969	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 969 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
18	Hupcey, Donald Edward	1294	\$1,034.51	General Unsecured	Proterra Inc. 23-11120	Claim No. 1294 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.

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

Schedule 4 - Insufficient Documentation Claims

	Name of Claimant	Claim Number	Claim Amount	Claim Priority	Debtor	Reason For Disallowance
19	Iqbal, Zafar	386	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 386 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
20	Johnson, Daniel LaShea	592	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 592 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
21	Keizer, Ruth	274	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 274 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
22	Kim, Hyun Soo	409	\$33,500.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 409 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
23	KnowBe4, Inc.	57	\$18,840.00	General Unsecured	Proterra Operating Company, Inc. 23-11121	Claim No. 57 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
24	Lama, Sonam	1336	\$9,415.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 1336 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant. NOTE: Claim 1336 is also subject to objection as a late filed Claim. See Schedule 3.
25	Lee, Anna	458	\$1,068.39	General Unsecured	Proterra Inc. 23-11120	Claim No. 458 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
26	Lewis, Desmond	220	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 220 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
27	Marchitelli, Anthony and Phyllis	1167	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 1167 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.

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

Schedule 4 - Insufficient Documentation Claims

	Name of Claimant	Claim Number	Claim Amount	Claim Priority	Debtor	Reason For Disallowance
28	Mason, Carolyn V.	632	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 632 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
29	Mehta, Rushabh	1322	\$21,000.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 1322 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
30	Ouellette, Sylvain	1227	\$9.18	General Unsecured	Proterra Inc. 23-11120	Claim No. 1227 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
31	Pandya, Dhairya	245	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 245 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
32	Parcus, Jimmy	621	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 621 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
33	Park, Sung Joon	1133	\$4,952.88	General Unsecured	Proterra Inc. 23-11120	Claim No. 1133 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
34	Patel, Nirajkumar	561	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 561 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
35	Ruiz, Thomas	1024	\$500.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 1024 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
36	Said, Ibrahim	687	\$2,999.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 687 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.

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

Schedule 4 - Insufficient Documentation Claims

	Name of Claimant	Claim Number	Claim Amount	Claim Priority	Debtor	Reason For Disallowance
37	TONG, ANH	630	\$2,544.26	General Unsecured	Proterra Inc. 23-11120	Claim No. 630 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
38	Vaca, Alejandra	864	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 864 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
39	Verduzco, Arturo	1152	\$60,000.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 1152 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
40	Williams, Darnetta	460	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 460 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
41	Wong, Derek	723	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 723 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
42	Wong, Derek	724	\$0.00	General Unsecured	Proterra Operating Company, Inc. 23-11121	Claim No. 724 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
43	Xu, Jian	560	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 560 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
44	Zaehler, Steve	743	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 743 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
45	Zehner, Mike W	434	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 434 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.

EXHIBIT B

Redline

**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. ~~1445~~ 1445

ORDER SUSTAINING THE DISTRIBUTION TRUSTEE’S FOURTH OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CERTAIN (I) AMENDED AND SUPERSEDED CLAIMS, (II) DUPLICATE CLAIMS, (III) LATE FILED CLAIMS, AND (IV) INSUFFICIENT DOCUMENTATION 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 “Amended Claims”), Schedule 2 (the “Duplicate Claims”), Schedule 3 (the “Late Filed Claims”), and Schedule 4 (the “Insufficient Documentation Claims,” and together with the Amended Claims, the Duplicate Claims, and the Late Filed 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 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

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.

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. The Amended Claims listed under the column titled “Amended Claim to be Disallowed” on the attached Schedule 1 are disallowed and expunged in their entirety. The claims listed under the column titled “Remaining Claim” on the attached Schedule 1 shall remain on the Claims Register, unless such Remaining Amended Claim is otherwise disallowed by this Order or another Order of this Court, subject the Distribution Trustee’s, or any other parties’ further objections on any substantive or non-substantive grounds.
4. The Duplicate Claims listed under the column titled “Duplicate Claim to be Disallowed” on the attached Schedule 2 are disallowed and expunged in their entirety. The claims listed under the column titled “Remaining Claim” on the attached Schedule 2 shall remain on the Claims Register, unless such Remaining Duplicate Claim is otherwise disallowed by this Order or

another Order of this Court, subject the Distribution Trustee's, or any other parties' further objections on any substantive or non-substantive grounds. In addition, to the extent the Duplicate Claims contain attachments that were not included with the Remaining Claims, such attachments shall be deemed to be attached to the Remaining Duplicate Claims.

5. The Late Filed Claims listed on the attached Schedule 3 are disallowed and expunged in their entirety.

6. The Insufficient Documentation 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.

SCHEDULE 1

Amended and Superseded Claims

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

Schedule 1 - Amended and Superseded Claims

	Name of Claimant	Remaining Claim	Remaining Claim Asserted Amount	Debtor for Remaining Claim	Amended Claim to be Disallowed	Disallowed Asserted Claim Amount	Debtor for Disallowed Claim	Reason For Disallowance
1	Missouri Department of Revenue	1406	Administrative: Secured: Priority Unsecured: \$1,278.64 General Unsecured: _____ Total Claim Amount \$1,278.64	Proterra Operating Company, Inc. 23-11121	1359	Administrative: \$1,762.64 Secured: Priority Unsecured: General Unsecured: _____ Total Claim Amount \$1,762.64	Proterra Operating Company, Inc. 23-11121	Claim No. 1406 amends and supersedes Claim No. 1359.
2	Missouri Department of Revenue	1409	Administrative: \$1,278.64 Secured: Priority Unsecured: General Unsecured: _____ Total Claim Amount \$1,278.64	Proterra Operating Company, Inc. 23-11121	1406	Administrative: Secured: Priority Unsecured: \$1,278.64 General Unsecured: _____ Total Claim Amount \$1,278.64	Proterra Operating Company, Inc. 23-11121	Claim No. 1409 amends and supersedes Claim No. 1406.

SCHEDULE 2

Duplicate Claims

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

Schedule 2 - Duplicate Claims

	Name of Claimant	Remaining Claim	Remaining Claim Asserted Amount		Debtor for Remaining Claim	Duplicate Claim to be Disallowed	Disallowed Asserted Claim Amount		Debtor for Disallowed Claim	Reason For Disallowance
1	Mobility Forefront LLC	1333	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	Unliquidated	Proterra Inc. 23-11120	1138	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	Unliquidated	Proterra Inc. 23-11120	Claimant filed multiple claims for the same liability or liabilities. The liability or liabilities included in the claim in the column "Duplicate Claim to be Disallowed" is duplicative of the liabilities contained in the claim in the column "Remaining Claim." The Duplicate Claim should be disallowed and expunged in its entirety. NOTE: Claim 1333 is also subject to objection as Contingent or Unliquidated. See Schedule 5.
			Total Claim Amount	Unliquidated			Total Claim Amount	Unliquidated		
2	Rhombus Energy Solutions, Inc.	1390	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$10,975.37 \$2,983.87 \$544,484.48	Proterra Inc. 23-11120	1389	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$10,975.37 \$2,983.87 \$544,484.48	Proterra Operating Company, Inc. 23-11121	Claimant filed multiple claims for the same liability or liabilities. The liability or liabilities included in the claim in the column "Duplicate Claim to be Disallowed" is duplicative of the liabilities contained in the claim in the column "Remaining Claim." The Duplicate Claim should be disallowed and expunged in its entirety.
			Total Claim Amount	\$558,443.72			Total Claim Amount	\$558,443.72		

SCHEDULE 3

Late Filed Claims

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

Schedule 3 - Late Filed Claims

	Name of Claimant	Claim Number	Date Claim was Filed	Claim Asserted Amount and Priority	Debtor	Reason For Disallowance
1	Digital Media Innovations LLC	1407	6/26/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$875.00 Total Claim Amount \$875.00	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023
2	SPAL USA	1405	6/4/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$57,432.13 Total Claim Amount \$57,432.13	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023
3	Atlas-Pellizzari Electric Inc.	1400	5/6/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$149,422.00 Total Claim Amount \$149,422.00	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023
4	Motion Industries	1399	4/30/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$4,289.79 Total Claim Amount \$4,289.79	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023
5	Suzhou Current Electric Limited Company	1396	4/26/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$150.78 Total Claim Amount \$150.78	Proterra Operating Company, Inc. 23-11121	Claim was filed after the applicable General Bar date of November 13, 2023
6	City of Wilsonville	1388	4/12/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$26,019.52 Total Claim Amount \$26,019.52	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023
7	Jet Garagae Inc.	1387	4/12/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$1,356.00 Total Claim Amount \$1,356.00	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023

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

Schedule 3 - Late Filed Claims

	Name of Claimant	Claim Number	Date Claim was Filed	Claim Asserted Amount and Priority		Debtor	Reason For Disallowance
8	Quad City Garage Policy Group	1377	4/11/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$2,832.03	Proterra Operating Company, Inc. 23-11121	Claim was filed after the applicable General Bar date of November 13, 2023
				Total Claim Amount	\$2,832.03		
9	Redding Area Bus Authroity	1337	3/19/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$2,359.50	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023
				Total Claim Amount	\$2,359.50		
10	Lama, Sonam	1336	3/16/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$9,415.00	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023 NOTE: Claim 1336 is also subject to objection as an Insufficient Document Claim. See Schedule 4.
				Total Claim Amount	\$9,415.00		
11	Element Materials Technology Detroit LLC	1309	2/23/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$2,735.00	Proterra Operating Company, Inc. 23-11121	Claim was filed after the applicable General Bar date of November 13, 2023
				Total Claim Amount	\$2,735.00		
12	TE Connectivity Corporation	1262	1/17/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$89,949.32	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023
				Total Claim Amount	\$89,949.32		

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

Schedule 3 - Late Filed Claims

	Name of Claimant	Claim Number	Date Claim was Filed	Claim Asserted Amount and Priority	Debtor	Reason For Disallowance
13	White Rock Mfg.	1255	1/10/2024	Administrative: Secured: Priority Unsecured: General Unsecured: \$141,595.53 Total Claim Amount \$141,595.53	Proterra Operating Company, Inc. 23-11121	Claim was filed after the applicable General Bar date of November 13, 2023
14	Qualtrics	1221	11/28/2023	Administrative: Secured: Priority Unsecured: General Unsecured: \$41,000.00 Total Claim Amount \$41,000.00	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023

SCHEDULE 4

Insufficient Documentation Claims

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

Schedule 4 - Insufficient Documentation Claims

	Name of Claimant	Claim Number	Claim Amount	Claim Priority	Debtor	Reason For Disallowance
1	Alaniz, Paul	545	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 545 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
2	Avina, Gabriel	1209	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 1209 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
3	Bajwa, Haider	765	\$490.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 765 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
4	Bluemle, Andreas	456	\$1,170.68	General Unsecured	Proterra Inc. 23-11120	Claim No. 456 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
5	Campanella, Peter	72	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 72 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
6	Cassilli, Joseph	340	\$500.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 340 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
7	Chang, Pamella	292	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 292 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
8	Cho, Nicholas	354	\$2,272.33	General Unsecured	Proterra Inc. 23-11120	Claim No. 354 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
9	Coultman, Craig	577	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 577 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.

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

Schedule 4 - Insufficient Documentation Claims

	Name of Claimant	Claim Number	Claim Amount	Claim Priority	Debtor	Reason For Disallowance
10	Fenton, Teal	440	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 440 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
11	Gainey, Timothy	1261	\$92.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 1261 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
12	Gnanamuttu, Anuran	766	\$551.34	General Unsecured	Proterra Inc. 23-11120	Claim No. 766 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
13	Gonzalez, Jaudiel	474	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 474 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
14	Graves, Jennie	1316	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 1316 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
15	Haltec Corporation	351	\$9,508.90	General Unsecured	Proterra Operating Company, Inc. 23-11121	Claim No. 351 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
16	Han, Sun W	1205	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 1205 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
17	Hopkins, Corey	969	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 969 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
18	Hupcey, Donald Edward	1294	\$1,034.51	General Unsecured	Proterra Inc. 23-11120	Claim No. 1294 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.

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

Schedule 4 - Insufficient Documentation Claims

	Name of Claimant	Claim Number	Claim Amount	Claim Priority	Debtor	Reason For Disallowance
19	Iqbal, Zafar	386	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 386 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
20	Johnson, Daniel LaShea	592	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 592 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
21	Keizer, Ruth	274	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 274 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
22	Kim, Hyun Soo	409	\$33,500.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 409 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
23	KnowBe4, Inc.	57	\$18,840.00	General Unsecured	Proterra Operating Company, Inc. 23-11121	Claim No. 57 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
24	Lama, Sonam	1336	\$9,415.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 1336 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant. NOTE: Claim 1336 is also subject to objection as a late filed Claim. See Schedule 3.
25	Lee, Anna	458	\$1,068.39	General Unsecured	Proterra Inc. 23-11120	Claim No. 458 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
26	Lewis, Desmond	220	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 220 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
27	Marchitelli, Anthony and Phyllis	1167	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 1167 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.

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

Schedule 4 - Insufficient Documentation Claims

	Name of Claimant	Claim Number	Claim Amount	Claim Priority	Debtor	Reason For Disallowance
28	Mason, Carolyn V.	632	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 632 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
29	Mehta, Rushabh	1322	\$21,000.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 1322 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
30	Ouellette, Sylvain	1227	\$9.18	General Unsecured	Proterra Inc. 23-11120	Claim No. 1227 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
31	Pandya, Dhairya	245	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 245 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
32	Parcus, Jimmy	621	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 621 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
33	Park, Sung Joon	1133	\$4,952.88	General Unsecured	Proterra Inc. 23-11120	Claim No. 1133 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
34	Patel, Nirajkumar	561	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 561 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
35	Ruiz, Thomas	1024	\$500.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 1024 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
36	Said, Ibrahim	687	\$2,999.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 687 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.

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

Schedule 4 - Insufficient Documentation Claims

	Name of Claimant	Claim Number	Claim Amount	Claim Priority	Debtor	Reason For Disallowance
37	TONG, ANH	630	\$2,544.26	General Unsecured	Proterra Inc. 23-11120	Claim No. 630 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
38	Transit Authority of River City	1327	\$3,192,348.00	General Unsecured	Proterra Inc. 23-11122	Claim No. 1327 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
39	Vaca, Alejandra	864	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 864 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
40	Verduzco, Arturo	1152	\$60,000.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 1152 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
41	Williams, Darnetta	460	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 460 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
42	Wong, Derek	723	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 723 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
43	Wong, Derek	724	\$0.00	General Unsecured	Proterra Operating Company, Inc. 23-11121	Claim No. 724 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
44	Xu, Jian	560	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 560 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.
45	Zaehler, Steve	743	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 743 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.

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

Schedule 4 - Insufficient Documentation Claims

	Name of Claimant	Claim Number	Claim Amount	Claim Priority	Debtor	Reason For Disallowance
46	Zehner, Mike W	434	\$0.00	General Unsecured	Proterra Inc. 23-11120	Claim No. 434 does not include or attach sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Books and Records do not reflect any basis for the claim on behalf of the Claimant.