

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

In re:

Prodigy Investments Holdings, Inc.,<sup>1</sup>

Reorganized Debtor.

Chapter 11

Case No. 23-11120 (BLS)

**Re: Docket No. 1461**

**CERTIFICATE OF NO OBJECTION**

The undersigned counsel hereby certifies as follows:

On November 12, 2024, Steven Balasiano, in his capacity as distribution trustee (“Distribution Trustee”) of the PTR A Distribution Trust of the above captioned reorganized debtor, by and through undersigned counsel, filed the *Motion of the Distribution Trustee Pursuant to Fed. R. Bankr. P. 9019 for Entry of an Order Approving Stipulation Between the Distribution Trustee and Michele Thorne* [Docket No. 1461] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

The deadline to object to the Motion was November 26, 2024 at 4:00 p.m. (ET).

The undersigned further certifies that after reviewing the Court’s docket in this case, no formal answer, objection, or other responsive pleading to the Motion appears thereon. The Distribution Trustee respectfully requests that the Court enter the proposed order granting the Motion, a copy of which was attached as Exhibit A to the Motion.

[Signature to Follow]

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<sup>1</sup> The Reorganized Debtor in this chapter 11 case (f/k/a Proterra Inc.), 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.



Dated: December 3, 2024

**MORRIS JAMES LLP**

/s/ Siena B. Cerra

Eric J. Monzo (DE Bar No. 5214)  
Brya M. Keilson (DE Bar No. 4643)  
Siena B. Cerra (DE Bar No. 7290)  
500 Delaware Avenue, Suite 1500  
Wilmington, DE 19801  
Telephone: (302) 888-6800  
Facsimile: (302) 571-1750  
E-mail: emonzo@morrisjames.com  
bkeilson@morrisjames.com  
scerra@morrisjames.com

-and-

**LOWENSTEIN SANDLER LLP**

Jeffrey L. Cohen, Esq. (admitted *pro hac vice*)  
Eric S. Chafetz, Esq. (admitted *pro hac vice*)  
Daniel B. Besikof, Esq. (admitted *pro hac vice*)  
1251 Avenue of the Americas  
New York, NY 10020  
Telephone: (212) 262-6700  
Facsimile: (212) 262-7402  
E-mail: jcohen@lowenstein.com  
echafetz@lowenstein.com  
dbesikof@lowenstein.com

*Counsel to the Distribution Trust*