

Amyr Naeem LLP
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Bellaire, Texas 77401

Office of the Clerk of the United States Bankruptcy Court
for the District of Delaware
Attn : Honorable Brendan L. Shannon
824 North Market Street, 3rd Floor
Wilmington, Delaware 19801

December 11, 2024

Dear Honorable Brendan L. Shannon,

I am a creditor and filed my claim as a governmental unit. I represent KPMG Peat Marwick (the name was subsequently changed to KPMG Consulting) and my own entity, Amyr Naeem LLP. My claim remains classified as Priority.

In our previous hearing on 11/20/2024, I made an argument to highlight the advancements Stellantis N.V. and Factorial Inc. have made to accelerate the future of electric vehicles with solid-state battery technology. This was an article published in BusinessWire on 10/23/2024.

I also made the argument that Proterra's assets were split into three divisions and sold off. The Proterra Powered powertrain manufacturing business line would operate as an independent company within the Volvo Group. The transit bus manufacturing business line was sold to Phoenix Motorcars. The Proterra Energy business line which built charging systems for fleets of heavy-duty vehicles was purchased by Cowen Equity. These actions would be an advantage to me as creditor.

According to 11 U.S. Code §501 – Filing of proofs of claims or interest,

(a) A creditor or an indenture trustee may file a proof of claim. An equity security holder may file a proof of interest.

and/or

(e) A claim arising from the liability of a debtor (the Reorganized Debtors or others) for fuel use tax assessed consistent with the requirements of section 31705 of title 49 may be filed by the base jurisdiction designated pursuant to the International Fuel Tax Agreement (as defined in section 31701 of title 49) and, if so filed, shall be allowed as a single claim.

Delaware law permits the garnishment of up to 15% of a debtor's net income. This would extend to the contents of the PTR A Distribution Trust.

Sincerely,



Amyr Naeem

Enclosures : Government Attorney Certification
Financial Statements



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UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In Re:

Chapter 11

Prodigy Investment Holdings, Inc.,
Reorganized Debtor.

Case No. 23 - 11120 (BLS)

GOVERNMENT ATTORNEY CERTIFICATION

Pursuant to the requirement of Local Rule 9010-1(e) for admittance of Government counsel to represent the United States of America (or any officer or agency thereof) or any state or local government (or any officer or agency thereof), the undersigned counsel hereby certifies the following in order to satisfy the requirement to appear to represent Amyr Naeem

in this action: I am admitted to practice law in (court(s))

North America

I am in good standing in all jurisdictions to which I have been admitted; and, further, I consent to be bound by the Local Rules of the Bankruptcy Court-District of Delaware and submit to the jurisdiction of this court for disciplinary purposes.

Agency/Organization

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