

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

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In re:	Chapter 11
PRODIGY INVESTMENT HOLDINGS, INC., <sup>1</sup>	Case No. 23-11120-BLS
Reorganized Debtor.	Jointly Administered

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**CITY OF MADISON'S RESPONSE IN OPPOSITION  
TO DISTRIBUTION TRUSTEE'S FIFTH OMNIBUS (SUBSTANTIVE) OBJECTION  
TO CERTAIN CONTINGENT AND UNLIQUIDATED CLAIMS**

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The City of Madison, Wisconsin ("City"), by and through its undersigned counsel, Eric Finch, Assistant City Attorney, hereby responds in opposition to Distribution Trustee's Fifth Omnibus (Substantive) Objection to Certain Contingent and Unliquidated Claims [Docket No. 1476] (the "Fifth Omnibus Objection") and in support thereof, states as follows:

1. On November 13, 2023, the City filed Claim No. 1093, which has since been expunged.
2. On February 3, 2024, the City filed Claim No. 1287 (Claim 1287).
3. On March 8, 2024, the City filed Claims Nos. 1331 and 1332. Claim 1332 has since been expunged.
4. The principal reason for the filing of multiple claims was that more accurate information was provided over the course of the proceeding, ultimately resulting in the Claim 1331, which reasonably represents the facts of the contractual claim to that date.

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<sup>1</sup> 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., 2<sup>nd</sup> Floor, Miami, FL 33133.



5. The general bar date for claims was February 5<sup>th</sup>, but Claim 1331 was properly made after that date based on the proceedings of the case.

6. Today, the City is responding to the Fifth Omnibus objection as to Claim 1287 to prevent any uncertainty of the validity and timeliness of the Claims of the City of Madison.

WHEREFORE, the City respectfully requests that this Court: (i) deny the Fifth Omnibus Objection as to Claim 1287; (ii) Amend Claim 1287 to be an exact textual duplicate of Claim 1331; (iii) grant such other and further relief as is just and proper.

Upon such amendment as outlined above, the City of Madison would then stipulate to the dismissal of Claim 1331, as it would be duplicative of Claim 1287. Counsel for the City of Madison will work in proactive fashion with Counsel for the Reorganized Debtor and Counsel for the Distribution Trustee to resolve this objection in advance of the January 15<sup>th</sup> hearing.

Dated: January 8, 2025

Respectfully submitted,

**CITY OF MADISON**  
Office of the City Attorney




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Attorney & Counsel Pro Hac Vice for the  
City of Madison, Wisconsin

**CERTIFICATE OF SERVICE**

I, Eric Finch, hereby certify that on the 8<sup>th</sup> day of January 2025, a copy of the foregoing was served via the Court's Electronic Filing (ECF) system on all parties registered to receive electronic notices in this case, and also upon the parties listed below by electronic mail.

  
Eric A. Finch