

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

In re:

Prodigy Investments Holdings, Inc.,¹

Reorganized Debtor.

Chapter 11

Case No. 23-11120 (BLS)

Re: Docket No. 1505

CERTIFICATE OF NO OBJECTION REGARDING DOCKET NO. 1505

The undersigned counsel hereby certifies as follows:

On January 29, 2025, 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 for an Order (I) Enforcing the Confirmation Order and (II) Granting Related Relief* [Docket No. 1505] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

The deadline to object to the Motion was February 12, 2025 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 attached to the Motion, and attached hereto as Exhibit A.

[Signature to Follow]

¹ 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: February 13, 2025

MORRIS JAMES LLP

/s/ Siena B. Cerra

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Counsel to the Distribution Trust

EXHIBIT A

Proposed 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. 1505

**ORDER GRANTING DISTRIBUTION TRUSTEE’S
MOTION TO ENFORCE CONFIRMATION ORDER**

Upon the motion (the “Motion”)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, for entry of an order (this “Order”) enforcing the Confirmation Order, including the Plan Injunction, against Jorge Sanchez (“Sanchez”), Rikki Rodriguez (“Rodriguez”), and Nick Marquez (“Marquez”); and this Court having jurisdiction over this matter pursuant to 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 this Court having the power to enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Distribution Trustee’s notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the

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² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

statements in support of the relief requested therein at a hearing before this Court (the “Hearing”), if any; and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing, if any, establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. In accordance with the Confirmation Order and Plan, Sanchez is estopped, enjoined and precluded from continuing the Sanchez Action and asserting any claims or causes of action against the Debtors, the Reorganized Debtors, the Distribution Trust, the Distribution Trustee, and the Debtors’ estates.
3. In accordance with the Confirmation Order and Plan, Rodriguez and Marquez are estopped, enjoined and precluded from asserting any claims or causes of action against the Debtors, the Reorganized Debtors, the Distribution Trust, the Distribution Trustee, and the Debtors’ estates.
4. The Plan Injunction is applicable to the Sanchez Action and any other action taken on the part of Sanchez to collect on account of any alleged claims against the Debtors, the Reorganized Debtors, the Distribution Trust, the Distribution Trustee, and the Debtors’ estates.
5. The Distribution Trustee’s right to object in the future to any late claim filed by Sanchez, Rodriguez, or Marquez is fully reserved.
6. Notice of the Motion, as provided therein, shall be deemed good and sufficient notice of the Motion, and the requirements set forth in Rule 9013-1 of the Local Rules for the United States Bankruptcy Court for the District of Delaware are satisfied.

7. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.

8. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.