

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. 1519

CERTIFICATE OF NO OBJECTION REGARDING DOCKET NO. 1519

The undersigned counsel hereby certifies as follows:

On February 24, 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 its undersigned counsel, filed the *Second Motion of the Motion Distribution Trustee for Entry of an Order Extending the Claims Objection Deadline Through and Including September 8, 2025* (the “Motion”) [Docket No. 1519] with the United States Bankruptcy Court for the District of Delaware (the “Court”).

The deadline to object to the Motion was March 10, 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 granting the Motion, a copy of which was attached hereto and to the Motion 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: March 11, 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)

Re: Docket No. 1519

**ORDER EXTENDING THE CLAIMS OBJECTION DEADLINE
THROUGH AND INCLUDING SEPTEMBER 8, 2025**

Upon the motion (the “Motion”)² of the distribution trustee (the “Distribution Trustee”) of the PTRAs Distribution Trust established in the above-captioned chapter 11 case of the reorganized debtor, for an order extending the deadline to object to Claims through and including September 8, 2025; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; venue being proper before this Court; consideration of the Motion and the relief requested being a core proceeding pursuant to 28 U.S.C. § 157(b); due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; the Court having found and determined that the relief sought in the Motion is in the best interests of the creditors of the Debtors’ estates and all parties in interest, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein;

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 otherwise defined herein shall have the meaning ascribed in the Motion or, if not defined in the Motion, such meanings as ascribed to them in the Plan (as defined in the Motion).

2. The Claims Objection Deadline shall be, and hereby is, extended through and including September 8, 2025 as to all Filed Claims, Scheduled Claims, and Administrative Claim Requests, including claims that are payable from the Claims Reserve;

3. This Order is without prejudice to the rights of the Distribution Trustee to seek further extensions of the Claims Objection Deadline; and

4. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Order.