

**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. 1515

CERTIFICATE OF NO OBJECTION REGARDING DOCKET NO. 1515

The undersigned counsel hereby certify as follows:

On February 18, 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 *Motion of the Distribution Trustee for Entry of an Order Authorizing the Distribution Trustee to Redact Certain Confidential Information In Connection With the Distribution Trustee's Objection to Claim Number 1325 Filed by Daimler Truck North America LLC* (the “Motion”) [Docket No. 1515] with the United States Bankruptcy Court for the District of Delaware (the “Court”).

The deadline to object to the Motion was March 11, 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 19, 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. 1515

**ORDER AUTHORIZING THE DISTRIBUTION TRUSTEE TO REDACT CERTAIN
CONFIDENTIAL INFORMATION IN CONNECTION WITH THE DISTRIBUTION
TRUSTEE'S OBJECTION TO CLAIM NUMBER 1325 FILED
BY DAIMLER TRUCK NORTH AMERICA LLC**

Upon the motion (the "Motion")² of the Distribution Trustee for entry of an order pursuant to sections 105 and 107 of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1 authorizing the Distribution Trustee to file the Claim Objection under seal, the Court finds that (i) it has jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. §§ 157 and 1334(b); (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) the relief requested in the Motion is in the best interest of all parties; (iv) proper and adequate notice of the Motion and the hearing thereon has been given and that no other or further notice is necessary; and (v) upon the record herein after due deliberation thereon, good and sufficient cause exists for the granting of the relief as set forth herein. Therefore,

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.

2. The Distribution Trustee is authorized to file an unredacted version of the Claim Objection under seal.

3. The Distribution Trustee is permitted to file a redacted version of the Claim Objection.

4. The unredacted version of the Claim Objection may not be unsealed unless and until permitted by further order of this Court.

5. The Distribution Trustee is authorized and empowered to take such actions as may be necessary and appropriate to implement the terms of this Order.

6. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.