

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. 1579

**CERTIFICATE OF NO OBJECTION REGARDING THE DISTRIBUTION
TRUSTEE'S SEVENTH OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO
CERTAIN (I) AMENDED AND SUPERSEDED CLAIMS AND
(II) LATE FILED CLAIMS [DOCKET NO. 1579]**

The undersigned counsel hereby certifies as follows:

On September 3, 2025, Steven Balasiano, in his capacity as distribution trustee (“Distribution Trustee”) of the PTRA Distribution Trust of the above captioned reorganized debtor, by and through its undersigned counsel, filed *The Distribution Trustee’s Seventh Omnibus (Non-Substantive) Objection To Certain (I) Amended and Superseded Claims and (II) Late Filed Claims* (the “Claims Objection”) [Docket No. 1579] with the United States Bankruptcy Court for the District of Delaware (the “Court”).

The deadline to respond to the Claims Objection was September 24, 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 Claims Objection appears thereon. The Distribution Trustee respectfully requests that the Court enter the proposed order granting the Claims Objection, a copy of which was attached hereto and to the Claims Objection as **Exhibit A**.

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: September 25, 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. 1579

**ORDER SUSTAINING THE DISTRIBUTION TRUSTEE’S
SEVENTH OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CERTAIN
(I) AMENDED AND SUPERSEDED CLAIMS AND (II) LATE FILED CLAIMS**

Upon the objection (the “Objection”)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 (“Prodigy” or the “Reorganized Debtor”), to certain proofs of claim filed by the claimants (the “Claimants”) on Schedule 1 (the “Amended Claims”) and Schedule 2 (the “Late Filed Claims” and together with the Amended Claims, the “Disputed Claims”); and this Court having reviewed the Objection and the Balasiano Declaration; and this Court having determined that the relief requested in the Objection is in the best interests of the Distribution Trustee, the Distribution Trust, the Reorganized Debtor, its estate, its creditors, and other parties in interest and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and this Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 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;

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 defined herein shall have the meanings ascribed to them in the Objection.

and consideration of the Objection and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b)(2); and this Court having authority to enter a final order consistent with Article III of the United States Constitution; and venue being proper before this Court under 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Objection has been given and that no other or further notice is necessary; and upon all of the proceedings before this Court; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby **ORDERED, ADJUDGED, AND DECREED THAT:**

1. The Objection is SUSTAINED as set forth herein.
2. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on the merits.
3. The Amended Claims listed under the column titled “Amended Claim to be Disallowed” on the attached Schedule 1 are disallowed and expunged in their entirety. The claims listed under the column titled “Remaining Claim” on the attached Schedule 1 shall remain on the Claims Register, unless such Remaining Amended Claim is otherwise disallowed by this Order or another Order of this Court, subject the Distribution Trustee’s, or any other parties’ further objections on any substantive or non-substantive grounds.
4. The Late Filed Claims listed on the attached Schedule 2 are disallowed and expunged in their entirety.
5. Notwithstanding Local Rule 3007-1(3)(iii), the rights of the Distribution Trustee or any other party to: (i) file subsequent objections to any claims listed on any of the Schedules annexed hereto on any ground, substantive or non-substantive (as permitted by the Court); (ii) amend, modify or supplement the Objection, including, without limitation, filing objections to further amended or newly-filed claims; (iii) seek to expunge or reduce any claim to the extent all

or a portion of such claim has been paid; and (iv) settle any claim for less than the asserted amount, are expressly preserved. Additionally, should one or more of the grounds for objection stated in the Objection be overruled, the Distribution Trustee's and any other parties' rights to object to the Remaining Claims on any other grounds are preserved. For the avoidance of doubt, leave from the requirements of Local Rule 3007-1(e)(iii) is hereby granted.

6. The objection to each claim, as addressed in the Objection and as set forth in the attached Schedules, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014 and Local Rule 3007-1. This Order shall be deemed a separate order with respect to each such claim that is the subject of the Objection. Any stay of this Order pending appeal by any Claimants whose claims are subject to this Order shall only apply to the contested matter that involves such Claimant and shall not act to stay the applicability and/or finality of this Order with respect to any other contested matters addressed in the Objection and this Order.

7. Verita is authorized and directed to modify the Claims Register to comport with the relief granted by this Order.

8. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Distribution Trustee or any other party may have to enforce rights against the Claimants, including but not limited to any right of setoff.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

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

SCHEDULE 1

Amended and Superseded Claims

Prodigy Investment Holdings, Inc., (f/k/a/ Proterra Inc.)
Case No. 23-11120 (BLS)

Schedule 1 - Amended and Superseded Claims

	Name of Claimant	Remaining Claim	Remaining Claim Asserted Amount	Debtor for Remaining Claim	Amended Claim to be Disallowed	Disallowed Asserted Claim Amount	Debtor for Disallowed Claim	Reason For Disallowance
1	Oregon Department of Revenue	N/A	Administrative: Secured: Priority Unsecured: \$452.06 <u>General Unsecured:</u> \$7.50 Total Claim Amount \$459.56	Proterra Inc. 23-11120	1242	Administrative: Secured: Priority Unsecured: \$152.06 <u>General Unsecured:</u> \$7.50 Total Claim Amount \$159.56	Proterra Inc. 23-11120	Claim No. 1413 amends and supersedes Claim No. 1242. Claim No. 1413 was already expunged in the <i>Order Sustaining the Distribution Trustee's Sixth Omnibus (Substantive) Objection to Certain (I) Misclassified Claims, (II) No Liability Claims, and (III) Overstated Claims</i> [D.I. 1548]
2	PAC Operating Limited Partnership	1415	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$406,285.95 Total Claim Amount \$406,285.95	Proterra Inc. 23-11120	1039	Administrative: Secured: \$108,199.48 Priority Unsecured: <u>General Unsecured:</u> \$8,507.11 Total Claim Amount \$116,706.59	Proterra Inc. 23-11120	Claim No. 1415 amends and supersedes Claim No. 1039.
3	Parker Hannifin Corporation	1416	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$167,277.50 Total Claim Amount \$167,277.50	Proterra Inc. 23-11120	213	Administrative: \$96,616.00 Secured: Priority Unsecured: <u>General Unsecured:</u> \$200,025.50 Total Claim Amount \$296,641.50	Proterra Inc. 23-11120	Claim No. 1416 amends and supersedes Claim No. 213

SCHEDULE 2

Late Filed Claims

Prodigy Investment Holdings, Inc., (f/k/a/ Proterra Inc.)
Case No. 23-11120 (BLS)

Schedule 2 - Late Filed Claims

	Name of Claimant	Claim Number	Date Claim was Filed	Claim Asserted Amount and Priority	Debtor	Reason For Disallowance
1	Boston, Mark	1417	5/23/2025	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$24,664.80 Total Claim Amount \$24,664.80	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023
2	DOGA USA	1410	9/4/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$9,306.92 Total Claim Amount \$9,306.92	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023
3	IFAB CORP	1412	12/30/2024	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u> \$15,821.26 Total Claim Amount \$15,821.26	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023
4	Saf-Gard Safety Shoe Company	1169	11/15/2023	Administrative: \$1,110.37 (503(b)(9)) Secured: Priority Unsecured: <u>General Unsecured:</u> \$4,644.12 Total Claim Amount \$5,754.49	Proterra Inc. 23-11120	Claim was filed after the applicable General Bar date of November 13, 2023
5	Toronto Transit Commission	1383	4/12/2024	Administrative: \$24,286.32 Secured: Priority Unsecured: <u>General Unsecured:</u> _____ Total Claim Amount \$24,286.32	Proterra Inc. 23-11121	Claim was filed after the applicable General Bar date of November 13, 2023