

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. 1580

**CERTIFICATE OF NO OBJECTION REGARDING THE
DISTRIBUTION TRUSTEE'S EIGHTH OMNIBUS (SUBSTANTIVE) OBJECTION
TO CERTAIN (I) MISCLASSIFIED CLAIMS, (II) NO LIABILITY CLAIMS,
(III) OVERSTATED CLAIMS, AND (IV) CONTINGENT AND
UNLIQUIDATED CLAIMS. [DOCKET NO. 1580]**

The undersigned counsel hereby certifies as follows:

On September 3, 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 Distribution Trustee’s Eighth Omnibus (Substantive) Objection to Certain (I) Misclassified Claims, (II) No Liability Claims, (III) Overstated Claims, and (IV) Contingent and Unliquidated Claims*. (the “Claims Objection”) [Docket No. 1580] 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

Eric J. Monzo (DE Bar No. 5214)
Brya M. Keilson (DE Bar No. 4643)
Siena B. Cerra (DE Bar No. 7290)
3205 Avenue North Blvd., Suite 100
Wilmington, DE 19803
Telephone: (302) 888-6800
Facsimile: (302) 571-1750
E-mail: emonzo@morrisjames.com
bkeilson@morrisjames.com
scerra@morrisjames.com

-and-

LOWENSTEIN SANDLER LLP

Jeffrey L. Cohen, Esq. (admitted *pro hac vice*)
Eric S. Chafetz, Esq. (admitted *pro hac vice*)
Daniel B. Besikof, Esq. (admitted *pro hac vice*)
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 262-6700
Facsimile: (212) 262-7402
E-mail: jcohen@lowenstein.com
echafetz@lowenstein.com
dbesikof@lowenstein.com

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. 1580

**ORDER SUSTAINING THE DISTRIBUTION TRUSTEE’S EIGHTH OMNIBUS
(SUBSTANTIVE) OBJECTION TO CERTAIN (I) MISCLASSIFIED CLAIMS,
(II) NO LIABILITY CLAIMS, (III) OVERSTATED CLAIMS, AND
(IV) CONTINGENT AND UNLIQUIDATED 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 “Misclassified Claim”), Schedule 2 (the “No Liability Claims”), Schedule 3 (the “Overstated Claims,”), and Schedule 4 (the “Unliquidated Claims” and together with the Misclassified Claim and the No Liability Claims, the “Disputed Claims,” and each a “Disputed Claim”) 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

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.

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; 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 Misclassified Claims listed under the column titled “Claim Number” on the attached Schedule 1 are hereby reclassified and modified in accordance with the column titled “Modified Claim Amount and Priority Status.” The Misclassified Claims listed in the column titled “Modified Claim Amount and Priority Status” on the attached Schedule 1 shall remain on the Claims Register as modified, unless such Misclassified Claims are otherwise disallowed and/or modified by this Order or another order of this Court, subject to the Distribution Trustee’s, or any other parties’ further objections on any substantive or non-substantive grounds.
4. The No Liability Claims listed on the attached Schedule 2 are disallowed and expunged in their entirety.

5. Each of the Overstated Claims listed under the column titled “Claim Number” on the attached Schedule 3 is hereby reduced and modified in accordance with the columns titled “Modified Claim Amount and Priority Status.” The Overstated Claims listed in the column titled “Modified Claim Amount and Priority Status” on the attached Schedule 3 shall remain on the Claims Register as modified, unless such Overstated Claims are otherwise disallowed and/or modified by this Order or another order of this Court, subject to the Distribution Trustee’s, or any other parties’ further objections on any substantive or non-substantive grounds.

6. Each of the Unliquidated Claims listed under the column titled “Claim Number” on the attached Schedule 4 is hereby disallowed and expunged in their entirety.

7. Notwithstanding Local Rule 3007-1(e)(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 Modified 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.

8. 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.

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

10. 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.

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

12. 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

Misclassified Claims

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

Schedule 1 - Misclassified Claims

		Name	Date Filed	Claim Number	Debtor	Claim Amount and Priority Status		Modified Claim Amount and Priority Status		REASON FOR MODIFICATION
1		Deere and Company	03/07/2024	1328	Proterra Operating Company, Inc. 23-11121	Administrative: \$0.00 Secured: \$20,000.00 Priority Unsecured: \$0.00 General Unsecured: \$0.00		Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$20,000.00		Claim is for prepetition goods sold on credit terms, which claim is not entitled to secured status. The Debtors rejected the contract. See D.I. 997. As such, the Claim should be reclassified as a General Unsecured Claim.
2		Des Moines Area Regional Transit Authority	10/31/2023	620	Proterra Operating Company, Inc. 23-11121	Administrative: \$0.00 Secured: \$3,574,482.00 Priority Unsecured: \$0.00 General Unsecured: \$0.00		Administrative: \$0.00 Secured: \$0.00 Priority Unsecured: \$0.00 General Unsecured: \$76,700.34		Claim asserts \$3,574,482.00 for contractual commitment for goods purchased. Claimant attached a copy of two letters concerning the Proterra/DART Coordinated Success Plan, but there is no calculation/summary of the specific damages incurred. The Claim is also not secured and should be reclassified as a General Unsecured Claim. The Trustee separately objects to the amount of the Claim. See Schedule 3.

SCHEDULE 2

No Liability Claims

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

Schedule 2 - No Liability Claims

	Name	Date Filed	Claim Number	Debtor	Asserted Claim Amount and Priority		Reason for Disallowance
1	L3Harris Technologies, Inc., L3Harris - PSPC	11/9/2023	928	Proterra Inc. 23-11120	Administrative: Secured: Priority Unsecured: General Unsecured:	\$0.00 \$0.00 \$0.00 <u>\$10,800.00</u>	Claimant asserts a General Unsecured Claim in the amount of \$10,800.00 for Invoice 93415817 dated 8/28/2023 that was billed against Purchase Order No. 765268. According to the Debtors' Books and Records, that purchase order was cancelled on 6/15/2023 due to years of no movement. As such, the Liquidating Trustee has no liability for the claim.
				Total Claim Amount	\$10,800.00		
2	Ruiz, Hector	11/17/2023	1191	Proterra Inc. 23-11120	Administrative: Secured: Priority Unsecured: General Unsecured:	\$0.00 \$0.00 \$0.00 <u>\$300,000.00</u>	Claimant asserts a General Unsecured Claim in the amount of \$300,000.00 on account of a wrongful termination lawsuit filed in Los Angeles County Superior Court. The State court action was dismissed in April 2025. The Debtors' books and records do not reflect any liability for this claim. As such, the Liquidating Trustee has no liability for the claim.
				Total Claim Amount	\$300,000.00		

SCHEDULE 3

Overstated Claims

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

Schedule 3 - Overstated Claims

Name		Date Filed	Claim Number	Debtor	Claim Amount and Priority Status		Modified Claim Amount and Priority Status		REASON FOR MODIFICATION
1	Cross Technologies, Inc.	10/5/2023	202	Proterra Operating Company, Inc. 23-11121	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$0.00 \$0.00 \$0.00 <u>\$431,369.20</u>	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$0.00 \$0.00 \$0.00 <u>\$6,144.62</u>	Claimant asserts \$431,369.20 as a General Unsecured but attached \$509,309.88 of invoices. According to the Debtors' books and records, the following payments on account of the claim were made: (1) \$2,251.52 on 9/13/2023 for INV752295 on PO GEM810860 (reference no. 489269), (2) \$404,639.50 on 3/8/2024 for Invoices IN733870, IN739331, INV740736, INV743873 and INV747600 on PO GEM809301; and INV738743, INV739028, IN743871, IN745758 and INV747598 on PO GEM810860 (reference no. 100252), and (3) \$96,274.24 on 11/30/23 for INV747958, INV748297, INV749452 and INV749723 on PO GEM809301 (reference no. 490549). Accordingly, the claim should be reduced to the General Unsecured Claim in the amount of \$6,144.62.
2	Eberspaecher Climate Control Systems U.S.A. Inc.	11/13/2023	1097	Proterra Operating Company, Inc. 23-11121	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$0.00 \$0.00 \$0.00 <u>\$2,515,862.00</u>	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$0.00 \$0.00 \$0.00 <u>\$1,223,844.00</u>	Claimant asserts a \$2,515,862.00 General Unsecured Claim on account of air conditioning units sold. A \$1,292,018.00 portion of the claim is on account of the costs for anticipated future orders from the Debtors. The Debtors never issued purchase orders for future air conditioning units covered by this portion of the claim. As such, the Liquidating Trustee has no liability for that portion of the claim and the claim should be reduced to a General Unsecured Claim in the amount of \$1,223,844.00.
3	LEB Services, LLC dba Jan-Pro of the Western Carolinas	9/20/2023	139	Proterra Inc. 23-11120	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$0.00 \$0.00 \$0.00 <u>\$47,400.52</u>	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$0.00 \$0.00 \$0.00 <u>\$9,866.91</u>	A portion of the General Unsecured Claim was satisfied by a partial cure payment that, according to the Debtors' Books and Records, was paid as follows: (i) \$27,533.61 (reference no. 850035) on 2/5/2024, and (ii) \$10,000.00 (reference no. 488737) on 6/1/2023. Accordingly, the claim should be reduced to a General Unsecured Claim in the amount of \$9,866.91.
4	Des Moines Area Regional Transit Authority	10/31/2023	620	Proterra Operating Company, Inc. 23-11121	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$0.00 \$3,574,482.00 \$0.00 <u>\$0.00</u>	Administrative: Secured: Priority Unsecured: <u>General Unsecured:</u>	\$0.00 \$0.00 \$0.00 <u>\$76,700.34</u>	Claimant asserts a General Unsecured Claim in the Amount of \$3,574,482.00 for contractual commitment for goods purchased. Claimant attached a copy of two letters concerning the Proterra/DART Coordinated Success Plan, but there is no calculation/summary of the specific damages incurred. Thus, the Claim should be reduced to \$76,700.34 per the Debtors' Books and Records. The Trustee separately objects to the priority of the Claim. See Schedule 1.

SCHEDULE 4

Unliquidated Claims

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

Schedule 4 - Unliquidated Claims

Name of Claimant	Claim Number	Date Claim was Filed	Claim Asserted Amount and Priority	Debtor	Reason For Disallowance
1 The Travelers Indemnity Company and Those Certain of its Property Casualty Insurance Affiliates	709	11/2/2023	Administrative: Unliquidated Secured: Priority Unsecured: <u>General Unsecured:</u> Unliquidated	Proterra Operating Company, Inc. 23-11121	Claimant asserts a contingent and an unliquidated amount and the claim lacks sufficient information to determine value.