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

In re:

Prodigy Investments Holdings, Inc.,<sup>1</sup>

Case No. 23-11120 (BLS)

Chapter 11

Reorganized Debtor.

# NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON MAY 8, 2024 AT 10:00 A.M. (ET)

# \*\* AS NO MATTERS ARE SCHEDULED TO GO FORWARD, WITH PERMISSION OF THE COURT, THIS HEARING HAS BEEN CANCELLED \*\*

### **ADJOURNED MATTERS:**

1. Motion of GS Operating, LLC d/b/a Gexpro Services for Allowance and Payment of an Administrative Expense Claim [Filed April 12, 2024; <u>Docket No. 1264</u>].

Objection Deadline: April 26, 2024 at 4:00 p.m. (ET); extended to June 28, 2024 at 4:00 p.m.

Objection/Response(s) Received: None at this time.

Related Documents: None at this time.

<u>Status</u>: This matter has been adjourned by agreement of the parties to July 31, 2024 at 10:00 a.m. (ET).

2. Oracle America Inc's Request for Allowance and Payment of Chapter 11 Administrative Expenses [Filed April 12, 2024; Docket No. 1265].

Objection Deadline: July 24, 2024 at 4:00 p.m. (ET).

Objection/Response(s) Received: None at this time.

<u>Related Documents</u>: None at this time.

Status: This matter has been adjourned by agreement of the parties to July 31, 2024 at

<sup>&</sup>lt;sup>1</sup> 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.



10:00 a.m. (ET).

3. Application of Power Electronics for Allowance and Payment of Administrative Expense [Filed April 12, 2024; Docket No. 1266].

Objection Deadline: July 24, 2024 at 4:00 p.m. (ET).

<u>Objection/Response(s) Received</u>: None at this time.

<u>Related Documents</u>: None at this time.

Status: This matter has been adjourned by agreement of the parties to July 31, 2024 at 10:00 a.m. (ET).

4. Application of Allied Universal Security Services for Allowance and Payment of Administrative Expense Claim [Filed April 12, 2024; <u>Docket No. 1269</u>].

Objection Deadline: May 2, 2024 at 4:00 p.m.; extended to July 24, 2024 at 4:00 p.m. (ET).

<u>Objection/Response(s) Received</u>: None at this time.

Related Documents: None at this time.

<u>Status</u>: This matter has been adjourned by agreement of the parties to July 31, 2024 at 10:00 a.m. (ET).

5. [Redacted] Daimler Truck North America LLC's Motion for Allowance and Payment of Administrative Expense Claims [Filed April 12, 2024; <u>Docket No. 1272</u>].

Objection Deadline: April 26, 2024 at 4:00 p.m.; extended to July 24, 2024 at 4:00 p.m. (ET).

Objection/Response(s) Received: None at this time.

Related Documents:

A. [Sealed] Daimler Truck North America LLC's Motion for Allowance and Payment of Administrative Expense Claims [Filed April 12, 2024; Docket No. 1270].

<u>Status</u>: This matter has been adjourned by agreement of the parties to July 31, 2024 at 10:00 a.m. (ET).

6. Birlasoft Solutions, Inc.'s Motion for Allowance and Payment of Administrative Expense Claim [Filed April 12, 2024; Docket No. 1273].

Objection Deadline: April 26, 2024 at 4:00 p.m.; extended to July 24, 2024 at 4:00 p.m. (ET).

Objection/Response(s) Received: None at this time.

Related Documents: None at this time.

<u>Status</u>: This matter has been adjourned by agreement of the parties to July 31, 2024 at 10:00 a.m. (ET).

## **<u>RESOLVED MATTERS</u>**:

7. Motion of Daimler Truck North America LLC's to Seal Portions of Motion for Allowance and Payment of Administrative Expense Claims [Filed April 12, 2024; <u>Docket No. 1271</u>].

Objection Deadline: April 26, 2024 at 4:00 p.m.

Objection/Response(s) Received: None.

Related Documents:

- A. Certificate of No Objection Regarding Motion of Daimler Truck North America LLC's to Seal Portions of Motion for Allowance and Payment of Administrative Expense Claims [Filed May 2, 2024; Docket No. 1307].
- B. Order Granting Motion of Daimler Truck North America LLC's to Seal Portions of Motion for Allowance and Payment of Administrative Expense Claims [Filed May 2, 2024; <u>Docket No. 1308</u>].

<u>Status</u>: An Order has been entered by the Court. Accordingly, a hearing on this matter is no longer necessary.

# FEE APPLICATIONS:

8. Interim Fee Applications – See attached **Exhibit A**.

Objection Deadline: April 8, 2024 at 4:00 p.m. (ET).

Objection/Response(s) Received:

A. Informal comments from Rucki Fee Review, LLC

#### Related Documents:

- A. Certification of Counsel Regarding Omnibus Order Approving Second Interim Fee Applications of the Debtors' Professionals [Filed April 26, 2024; <u>Docket No.</u> <u>1290</u>].
- B. Omnibus Order Approving Second Interim Fee Applications of the Debtors' Professionals [Filed April 26, 2024; <u>Docket No. 1291</u>].
- C. Certification of Counsel Regarding Omnibus Order Approving Second Interim Applications of the Committee Professionals [Filed April 29, 2024; <u>Docket No.</u> <u>1300</u>].
- D. Omnibus Order Approving Second Interim Applications of the Committee Professionals [Filed May 1, 2024; Docket No. 1305].
- <u>Status</u>: Orders have been entered by the Court. Accordingly, a hearing on this matter is no longer necessary.

Dated: May 6, 2024

#### **MORRIS JAMES LLP**

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-and-

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Counsel to the Distribution Trust

# EXHIBIT A

Interim Fee Applications

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

In re:

Prodigy Investments Holdings, Inc.,<sup>1</sup>

Reorganized Debtor.

Chapter 11

Case No. 23-11120 (BLS)

Re: Docket Nos. 1214, 1219, 1222

# INDEX OF SECOND INTERIM FEE APPLICATIONS TO BE CONSIDERED AT THE HEARING ON MAY 8, 2024 AT 10:00 A.M. (ET)

# Young Conaway Stargatt & Taylor, LLP Co-Counsel to the Debtors

1. Notice of Second Interim Fee Application of the Debtors' Professionals for the Period from September 1, 2023 Through and Including January 31, 2024 [Filed March 18, 2024; Docket No. 1214].

Objection Deadline: April 8, 2024 at 4:00 p.m. (ET).

Responses/Objections Received: None.

- A. Third Monthly Fee Application of Young Conaway Stargatt & Taylor, LLP, as Co-Counsel for the Debtors, for Allowance of Compensation and Reimbursement of Expenses for the Period from November 1, 2023 Through November 30, 2023 [Filed December 18, 2023; Docket No. 741].
- B. Certification of No Objection Regarding Third Monthly Fee Application of Young Conaway Stargatt & Taylor, LLP, as Co-Counsel for the Debtors, for Allowance of Compensation and Reimbursement of Expenses for the Period from November 1, 2023 Through November 30, 2023 [Filed January 9, 2024; Docket No. 838].
- C. Fourth Monthly Fee Application of Young Conaway Stargatt & Taylor, LLP, as Co-Counsel for the Debtors, for Allowance of Compensation and Reimbursement of Expenses for the Period from December 1, 2023 Through December 31, 2023 [Filed January 18, 2024; Docket No. 912].

<sup>&</sup>lt;sup>1</sup> 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.

- D. Certification of No Objection Regarding Fourth Monthly Fee Application of Young Conaway Stargatt & Taylor, LLP, as Co-Counsel for the Debtors, for Allowance of Compensation and Reimbursement of Expenses for the Period from December 1, 2023 Through December 31, 2023 [Filed February 9, 2024; Docket No. 1046].
- E. Fifth Monthly Fee Application of Young Conaway Stargatt & Taylor, LLP, as Co-Counsel for the Debtors, for Allowance of Compensation and Reimbursement of Expenses for the Period from January 1, 2024 Through January 31, 2024 [Filed February 16, 2024; Docket No. 1075].
- F. Certification of No Objection Regarding Fifth Monthly Fee Application of Young Conaway Stargatt & Taylor, LLP, as Co-Counsel for the Debtors, for Allowance of Compensation and Reimbursement of Expenses for the Period from January 1, 2024 Through January 31, 2024 [Filed March 11, 2024; Docket No. 1197].
- G. Supplement to Second Interim Fee Request of Young Conaway Stargatt & Taylor, LLP [Filed March 18, 2024; Docket No. 1215].
- H. Final Report Regarding Second Quarterly Fee Application of Young Conaway Stargatt & Taylor, LLP [Filed April 26, 2024; Docket No. 1282].

# Paul, Weiss, Rifkind, Wharton & Garrison, LLP Counsel to the Debtors

2. Notice of Second Interim Fee Application of the Debtors' Professionals for the Period from September 1, 2023 Through and Including January 31, 2024 [Filed March 18, 2024; Docket No. 1214].

Objection Deadline: April 8, 2024 at 4:00 p.m. (ET).

Responses/Objections Received: None.

- A. Third Monthly Fee Application of Paul, Weiss, Rifkind, Wharton & Garrison, LLP for Allowance of Compensation and Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period from November 1, 2023 Through November 30, 2023 [Filed December 21, 2023; Docket No. 758].
- B. Certification of No Objection Regarding Third Monthly Fee Application of Paul, Weiss, Rifkind, Wharton & Garrison, LLP for Allowance of Compensation and Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period from November 1, 2023 Through November 30, 2023 [Filed January 24, 2024; Docket No. 937].

- C. Fourth Monthly Fee Application of Paul, Weiss, Rifkind, Wharton & Garrison, LLP for Allowance of Compensation and Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period from December 1, 2023 Through December 31, 2023 [Filed January 24, 2024; Docket No. 938].
- D. Certification of No Objection Regarding Fourth Monthly Fee Application of Paul, Weiss, Rifkind, Wharton & Garrison, LLP for Allowance of Compensation and Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period from December 1, 2023 Through December 31, 2023 [Filed February 15, 2024; Docket No. 1071].
- E. Fifth Monthly Fee Application of Paul, Weiss, Rifkind, Wharton & Garrison, LLP for Allowance of Compensation and Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period from January 1, 2024 Through January 31, 2024 [Filed February 23, 2024; Docket No. 1112].
- F. Certification of No Objection Regarding Fifth Monthly Fee Application of Paul, Weiss, Rifkind, Wharton & Garrison, LLP for Allowance of Compensation and Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period from January 1, 2024 Through January 31, 2024 [Filed March 18, 2024; Docket No. 1221].
- G. Supplement to Second Interim Fee Request of Paul, Weiss, Rifkind, Wharton & Garrison, LLP [Filed March 18, 2024; Docket No. 1216].
- H. Final Report Regarding Second Quarterly Fee Application of Paul, Weiss, Rifkind, Wharton & Garrison, LLP [Filed April 26, 2024; Docket No. 1283].

## Moelis & Company LLC Investment Banker to the Debtors

3. Notice of Second Interim Fee Application of the Debtors' Professionals for the Period from September 1, 2023 Through and Including January 31, 2024 [Filed March 18, 2024; Docket No. 1214].

Objection Deadline: April 8, 2024 at 4:00 p.m. (ET).

Responses/Objections Received: None.

### Related Documents:

A. Third Monthly Fee Application of Moelis & Company LLC for Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses as Investment Banker to the Debtors from November 1, 2023 Through and Including December 31, 2023 [Filed February 16, 2024; Docket No. 1073].

- B. Certification of No Objection Regarding Third Monthly Fee Application of Moelis & Company LLC for Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses as Investment Banker to the Debtors from November 1, 2023 Through and Including December 31, 2023 [Filed March 11, 2024; Docket No. 1199].
- C. Final Report Regarding Second Quarterly Fee Application of Moelis & Company LLC [Filed April 26, 2024; Docket No. 1284].

# **KPMG LLP Audit and Tax Restructuring Service Provider to the Debtors**

4. Notice of Second Interim Fee Application of the Debtors' Professionals for the Period from September 1, 2023 Through and Including January 31, 2024 [Filed March 18, 2024; Docket No. 1214].

Objection Deadline: April 8, 2024 at 4:00 p.m. (ET).

Responses/Objections Received: None.

- A. Third Monthly Fee Application of KPMG LLP, Providing Audit and Tax Restructuring Services to the Debtors and Requesting Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period of November 1, 2023 Through November 30, 2023 [Filed February 1, 2024; Docket No. 967].
- B. Certification of No Objection Regarding Third Monthly Fee Application of KPMG LLP, Providing Audit and Tax Restructuring Services to the Debtors and Requesting Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period of November 1, 2023 Through November 30, 2023 [Filed February 23, 2024; Docket No. 1111].
- C. Fourth Monthly Fee Application of KPMG LLP, Providing Audit and Tax Restructuring Services to the Debtors and Requesting Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period of December 1, 2023 Through December 31, 2023 [Filed February 16, 2024; Docket No. 1074].
- D. Certification of No Objection Regarding Fourth Monthly Fee Application of Young Conaway Stargatt & Taylor, LLP, as Co-Counsel for the Debtors, for Allowance of Compensation and Reimbursement of Expenses for the Period from December 1, 2023 Through December 31, 2023 [Filed March 11, 2024; Docket No. 1198].

- E. Fifth Monthly Fee Application of KPMG LLP, Providing Audit and Tax Restructuring Services to the Debtors and Requesting Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period of January 1, 2024 Through January 31, 2024 [Filed March 7, 2024; Docket No. 1185].
- F. Certification of No Objection Regarding Fifth Monthly Fee Application of KPMG LLP, Providing Audit and Tax Restructuring Services to the Debtors and Requesting Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period of January 1, 2024 Through January 31, 2024 [Filed April 1, 2024; Docket No. 1245].
- G. Final Report Regarding Second Quarterly Fee Application of KPMG LLP [Filed April 26, 2024; Docket No. 1286].

# Slaughter and May Special Corporate Counsel to the Debtors

5. Notice of Second Interim Fee Application of the Debtors' Professionals for the Period from September 1, 2023 Through and Including January 31, 2024 [Filed March 18, 2024; Docket No. 1214].

Objection Deadline: April 8, 2024 at 4:00 p.m. (ET).

Responses/Objections Received: None.

- A. First Monthly Fee Application of Slaughter and May for Allowance of Compensation for Services Rendered as Special Corporate Counsel to the Debtors and Debtors in Possession for the Period from October 20, 2023 Through December 31, 2023 [Filed January 16, 2024; Docket No. 1893].
- B. Certification of No Objection Regarding First Monthly Fee Application of Slaughter and May for Allowance of Compensation for Services Rendered as Special Corporate Counsel to the Debtors and Debtors in Possession for the Period from October 20, 2023 Through December 31, 2023 [Filed February 7, 2024; Docket No. 1026].
- C. Second Monthly Fee Application of Slaughter and May for Allowance of Compensation for Services Rendered as Special Corporate Counsel to the Debtors and Debtors in Possession for the Period from January 1, 2024 Through January 31, 2024 [Filed February 19, 2024; Docket No. 1077].

- D. Certification of No Objection Regarding Second Monthly Fee Application of Slaughter and May for Allowance of Compensation for Services Rendered as Special Corporate Counsel to the Debtors and Debtors in Possession for the Period from January 1, 2024 Through January 31, 2024 [Filed March 13, 2024; Docket No. 1207].
- E. Supplement to Second Interim Fee Request of Slaughter and May [Filed March 18, 2024; Docket No. 1217].
- F. Final Report Regarding First Quarterly Fee Application of Slaughter and May [Filed April 26, 2024; Docket No. 1287].

## Kurtzman Carson Consultants LLC Administrative Advisor to the Debtors

6. Notice of Second Interim Fee Application of the Debtors' Professionals for the Period from September 1, 2023 Through and Including January 31, 2024 [Filed March 18, 2024; Docket No. 1214].

Objection Deadline: April 8, 2024 at 4:00 p.m. (ET).

Responses/Objections Received: None.

Related Documents:

- A. Fourth Monthly Fee Application of Kurtzman Carson Consultants LLC, as Administrative Advisor to the Debtors, for the Period from January 1, 2024 Through and Including January 31, 2024 [Filed February 27, 2024; Docket No. 11120].
- B. Certification of No Objection Regarding Fourth Monthly Fee Application of Kurtzman Carson Consultants LLC, as Administrative Advisor to the Debtors, for the Period from January 1, 2024 Through and Including January 31, 2024 [Filed March 20, 2024; Docket No. 1229].
- C. Final Report Regarding Second Quarterly Fee Application of Kurtzman Carson Consultants LLC [Filed April 26, 2024; Docket No. 1285].

## Lowenstein Sandler LLP Counsel to the Official Committee of Unsecured Creditors

 Second Interim Application of Lowenstein Sandler LLP as Counsel to the Official Committee of Unsecured Creditors for Services Rendered and Reimbursement of Expenses Incurred for the Period of November 1, 2023 Through January 31, 2024 [Filed March 18, 2024; Docket No. 1219]. Objection Deadline: April 8, 2024 at 4:00 p.m. (ET).

### Responses/Objections Received: None.

- A. Third Monthly Application of Lowenstein Sandler LLP, as Counsel to the Official Committee of Unsecured Creditors for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from November 1, 2023 Through November 30, 2023 [Filed December 26, 2023; Docket No. 770].
- B. Certification of No Objection Regarding Third Monthly Application of Lowenstein Sandler LLP, as Counsel to the Official Committee of Unsecured Creditors for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from November 1, 2023 Through November 30, 2023 [Filed January 17, 2024; Docket No. 901].
- C. Fourth Monthly Application of Lowenstein Sandler LLP, as Counsel to the Official Committee of Unsecured Creditors for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from December 1, 2023 Through December 31, 2023 [Filed January 19, 2024; Docket No. 917].
- D. Certification of No Objection Regarding Fourth Monthly Application of Lowenstein Sandler LLP, as Counsel to the Official Committee of Unsecured Creditors for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from December 1, 2023 Through December 31, 2023 [Filed February 12, 2024; Docket No. 1052].
- E. Fifth Monthly Application of Lowenstein Sandler LLP, as Counsel to the Official Committee of Unsecured Creditors for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from January 1, 2024 Through January 31, 2024 [Filed February 29, 2024; Docket No. 1137].
- F. Certification of No Objection Regarding Fifth Monthly Application of Lowenstein Sandler LLP, as Counsel to the Official Committee of Unsecured Creditors for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from January 1, 2024 Through January 31, 2024 [Filed March 22, 2024; Docket No. 1234].
- G. Final Report Regarding Second Quarterly Fee Application of Lowenstein Sandler LLP [Filed April 26, 2024; Docket No. 1289].

# Morris James LLP Delaware Counsel to the Official Committee of Unsecured Creditors

8. Second Interim Application of Morris James LLP, as Delaware Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period from November 1, 2023 Through January 31, 2024 [Filed March 18, 2024; Docket No. 1222].

Objection Deadline: April 8, 2024 at 4:00 p.m. (ET).

Responses/Objections Received: None.

- A. Third Monthly Application of Morris James LLP, as Delaware Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period from November 1, 2023 Through November 30, 2023 [Filed December 26, 2023; Docket No. 771].
- B. Certification of No Objection Regarding Third Monthly Application of Morris James LLP, as Delaware Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period from November 1, 2023 Through November 30, 2023 [Filed January 17, 2024; Docket No. 902].
- C. Fourth Monthly Application of Morris James LLP, as Delaware Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period from December 1, 2023 Through December 31, 2023 [Filed January 19, 2024; Docket No. 918].
- D. Certification of No Objection Regarding Fourth Monthly Application of Morris James LLP, as Delaware Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period from December 1, 2023 Through December 31, 2023 [Filed February 12, 2024; Docket No. 1053].
- E. Fifth Monthly Application of Morris James LLP, as Delaware Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period from January 1, 2024 Through January 31, 2024 [Filed February 29, 2024; Docket No. 1139].
- F. Certification of No Objection Regarding Fifth Monthly Application of Morris James LLP, as Delaware Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period from January 1, 2024 Through January 31, 2024 [Filed March 22, 2024; Docket No. 1235].

G. Final Report Regarding Second Quarterly Fee Application of Morris James LLP [Filed April 26, 2024; Docket No. 1288].

Dated: May 1, 2024

#### **MORRIS JAMES LLP**

/s/ Brya M. Keilson Eric J. Monzo (DE Bar No. 5214) Brya M. Keilson (DE Bar No. 4643) Siena B. Cerra (DE Bar No. 7290) 500 Delaware Avenue, Suite 1500 Wilmington, DE 19801 Telephone: (302) 888-6800 Facsimile: (302) 571-1750 E-mail: emonzo@morrisjames.com bkeilson@morrisjames.com

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