

IN 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)

**AMENDED<sup>2</sup> NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON AUGUST 28, 2024 AT 1:00 P.M. (ET)**

**\*\* THIS HEARING HAS BEEN CANCELLED AND RESCHEDULED TO  
SEPTEMBER 25, 2024 AT 10:00 A.M. (ET) AT THE DIRECTION OF THE COURT \*\***

**ADJOURNED MATTERS:**

1. Application of Allied Universal Security Services for Allowance and Payment of Administrative Expense Claim [Filed April 12, 2024; [Docket No. 1269](#)].

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

Objection/Response(s) Received: None.

Related Documents: None.

Status: This matter will be resolved pending Allied's withdrawal of the Application and has been adjourned to September 25, 2024 at 10:00 a.m. (ET).

2. The Distribution Trustee's First Omnibus (Non-Substantive) Objection to Certain (I) Amended and Superseded Claims, (II) Duplicate Claims, (III) Late Filed Claims, and (IV) Insufficient Documentation Claims [Filed May 28, 2024; [Docket No. 1326](#)].

Objection Deadline: June 20, 2024 at 4:00 p.m.; extended to July 24, 2024 for the United Steelworkers International Union and Airgas USA LLC.

<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.

<sup>2</sup> Amended items appear in **BOLD**.



Objection/Response(s) Received:

- A. Informal response received from United Steelworkers International Union.
- B. Informal response received from Airgas USA LLC.
- C. Informal response received from NetApp, Inc.
- D. Informal response received from Itr, LLC D/B/A All City Tow Service.
- E. Reservation of Rights and Response of BC Transit to The Distribution Trustee's First Omnibus (Non-Substantive) Objection to Certain (I) Amended and Superseded Claims, (II) Duplicate Claims, (III) Late Filed Claims, and (IV) Insufficient Documentation Claim [Filed June 7, 2024; [Docket No. 1358](#)].
- F. Missouri Department of Revenue's ("Missouri") Response to the Distribution Trustee's First Omnibus Objection [Filed June 18, 2024; [Docket No. 1371](#)].
- G. Response By The Tennessee Department of Revenue ("Tennessee") To The Distribution Trustee's First Omnibus Objection To Claims [Filed June 20, 2024; [Docket No. 1375](#)].
- H. Munich Electrification Systems GmbH's Response to The Distribution Trustee's First Omnibus (Non-Substantive) Objection to Certain (I) Amended and Superseded Claims, (II) Duplicate Claims, (III) Late Filed Claims, and (IV) Insufficient Documentation Claims and (B) Motion to File Amended Proof of Claim ("Munich Response and Motion") [Filed June 20, 2024; [Docket No. 1377](#)].

Related Documents:

- A. Notice of Submission of Proof of Claim in Connection with the Distribution Trustee's First Omnibus (Non-Substantive) Objection to Certain (I) Amended and Superseded Claims, (II) Duplicate Claims, (III) Late Filed Claims, and (IV) Insufficient Documentation Claims [Filed June 12, 2024; [Docket No. 1365](#)].

Status: The informal comments from Airgas have been resolved and the informal response received from United Steelworkers International Union has been withdrawn. A revised order reflecting NetApp's claim 1366 is the surviving claim and withdrawing the objections to Missouri's and Tennessee's claims from the late-filed objection schedule was entered by the Court [D.I. 1391] sustaining the First Omnibus Objection to Claims, other than those continued matters. Subject to further extensions as agreed upon by the parties, the hearing with respect to the Munich Response and Motion has been adjourned to September 25, 2024 at 10:00 a.m. (ET) with the Trustee's deadline to respond to the Motion extended through September 11, 2024.

**MATTERS GOING FORWARD:**

3. The Distribution Trustee's Second Omnibus (Non-Substantive) Objection To Certain Equity Claims That Should Instead Be Classified as Equity Interests and Expunged [Filed July 17, 2024; [Docket No. 1394](#)].

Objection Deadline: August 21, 2024 at 4:00 p.m.

Objection/Response(s) Received:

- A. Informal response received from Kwasi Sarpong.
- B. Informal response received from Xinshuang Nan.
- C. Informal response received from Jerry Aures.
- D. Informal response received from Sivaporn Basset.
- E. Informal response received from Ayr Naeem.
- F. Informal response received from Hassane Alsibai.
- G. Simon Brereton's Response to Second Omnibus Objection [Filed August 7, 2024; [Docket No. 1402](#) and [1403](#)].
- H. Dr. Adam Howard's Response to Second Omnibus Objection [Filed August 12, 2024; [Docket No. 1404](#)].
- I. Matthew Roth's Dispute Over Filed Proof of Claim [Filed August 13, 2024; [Docket No. 1405](#)].
- J. Robert Apostol's Response to the Distribution Trustee's Second Omnibus (Non-Substantive) Objection to Certain Equity Claims That Should Instead Be Classified as Equity Interests and Expunged [Filed August 19, 2024; [Docket No. 1407](#)].
- K. Selma Karakaya, Ilker Karakaya, and Melih Karamikoglu's Response to the Distribution Trustee's Second Omnibus (Non-Substantive) Objection to Certain Equity Claims That Should Instead Be Classified as Equity Interests and Expunged [Filed August 19, 2024; [Docket No. 1408](#)].
- L. Jessica Church's Response to the Distribution Trustee's Second Omnibus (Non-Substantive) Objection to Certain Equity Claims That Should Instead Be Classified as Equity Interests and Expunged [Filed August 20, 2024; [Docket No. 1409](#)].

M. Ayssam Maalem's Response to the Distribution Trustee's Second Omnibus (Non-Substantive) Objection to Certain Equity Claims That Should Instead Be Classified as Equity Interests and Expunged [Filed August 20, 2024; [Docket No. 1410](#)].

N. Hassane Alsibai's Response to the Distribution Trustee's Second Omnibus (Non-Substantive) Objection to Certain Equity Claims That Should Instead Be Classified as Equity Interests and Expunged [Filed August 22, 2024; [Docket No. 1412](#)].

Related Documents:

A. Certification of Counsel Regarding Order Sustaining The Distribution Trustee's Second Omnibus (Non-Substantive) Objection to Certain Equity Claims [Filed August 26, 2024; [Docket No. 1413](#)].

Status: The parties that responded at items A, B, C, D, and I have either stated in writing or orally confirmed they have withdrawn their response to the Second Omnibus Objection. The parties that responded at items F, G, K, and N have stated in writing that they do not withdraw their respective responses. The Distribution Trustee has revised the proposed form of order to remove the parties that filed responses at items E, F, G, H, J, K, L, M, and N from the equity claims schedules and submitted under certification of counsel otherwise sustaining the Second Omnibus Objection. **The hearing on this matter has been rescheduled to September 25, 2024 at 10:00 a.m. (ET) at the direction of the Court.**

Dated: August 26, 2024

**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)  
500 Delaware Avenue, Suite 1500  
Wilmington, DE 19801  
Telephone: (302) 888-6800  
Facsimile: (302) 571-1750  
E-mail: [emonzo@morrisjames.com](mailto:emonzo@morrisjames.com)  
[bkeilson@morrisjames.com](mailto:bkeilson@morrisjames.com)  
[scerra@morrisjames.com](mailto: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*