

IN 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)

**AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON OCTOBER 23, 2024 AT 11:00 A.M. (ET)**

**AT THE DIRECTION OF THE COURT, THIS HEARING IS ADJOURNED TO
NOVEMBER 20, 2024 AT 1:30 P.M. (ET).**

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 has been adjourned to November 20, 2024 at 1:30 p.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 The Distribution Trustee's First Omnibus (Non-Substantive) Objection to Certain (I) Amended and Superseded Claims, (II) Duplicate Claims, (III) Late Filed Claims, and (IV) Insufficient Documentation Claims [Filed May 28, 2024; [Docket No. 1326](#)].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; extended to November 6, 2024 as to Munich.

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 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of BC Transit to The Distribution Trustee's First Omnibus (Non-Substantive) Objection to Certain (I) Amended and Superseded Claims, (II) Duplicate Claims, (III) Late Filed Claims, and (IV) Insufficient Documentation Claim [Filed June 7, 2024; [Docket No. 1358](#)].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](#)].
- B. Certification of Counsel Regarding 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 July 10, 2024; [Docket No. 1387](#)].
- C. Order Sustaining 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 July 12, 2024; [Docket No. 1391](#)].

- D. Certification of Counsel Regarding Revised Order Sustaining 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 September 26, 2024; [Docket No. 1435](#)].
- E. Order Sustaining 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 September 27, 2024; [Docket No. 1436](#)].

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 as 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 **November 20, 2024 at 1:30 p.m. (ET)**.

MATTERS GOING FORWARD:

3. Motion of GS Operating, LLC d/b/a Gexpro Services for Allowance and Payment of an Administrative Expense Claim [Filed April 12, 2024; [Docket No. 1264](#)].

Objection Deadline: April 26, 2024 at 4:00 p.m.; extended to October 9, 2024.

Objection/Response(s) Received:

- A. The Distribution Trustee's Objection and Response to Motion of GS Operating, LLC d/b/a Gexpro Services for Allowance and Payment of an Administrative Expense Claim [Filed October 9, 2024; [Docket No. 1442](#)].
- B. Reply in Support of Motion of GS Operating, LLC d/b/a Gexpro Services for Allowance and Payment of an Administrative Expense Claim [Filed October 18, 2024; [Docket No. 1449](#)].

Related Documents: None.

Status: At the direction of the Court, the evidentiary hearing on this matter is adjourned to November 20, 2024 at 1:30 p.m. (ET).

4. 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](#)].
- B. Order Sustaining The Distribution Trustee's Second Omnibus (Non-Substantive) Objection to Certain Equity Claims [Filed August 27, 2024; [Docket No. 1416](#)].

Status:

- The parties that responded at items A, B, C, D, H, 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 parties that responded at items E, L, and M and J have neither withdrawn their objections nor notified the Distribution Trustee that they intend to press their objection.
 - A revised order reflecting the removal of the parties that filed responses at items E, F, G, H, J, K, L, M, and N from the equity claims schedules was entered by the Court [D.I. 1416] sustaining the Second Omnibus Objection to Claims, other than those continued matters. This matter is going forward with respect to the responses filed at items E, F, G, J, K, L, M, and N. **At the direction of the Court, this matter is adjourned to November 20, 2024 at 1:30 p.m. (ET).**
5. The Distribution Trustee's Third Omnibus (Substantive) Objection to Certain (I) Misclassified Claims, (II) Overstated and Misclassified Claims, (III) Overstated Claims, and (IV) No Liability Claims [Filed September 10, 2024; [Docket No. 1424](#)].

Objection Deadline: October 16, 2024 at 4:00 p.m.

Objection/Response(s) Received:

- A. Informal comments received from Itr, LLC d/b/a All City Tow Service.
- B. Response of Ron Whites Air Compressor Sales, Inc. to Debtors' Third Omnibus (Substantive) Objection to Certain (I) Misclassified Claims, (II) Overstated and Misclassified Claims, (III) Overstated Claims, and (IV) No Liability Claims [Filed October 16, 2024; [Docket No. 1446](#)].

Related Documents:

- A. Notice of Submission of Proofs of Claim in Connection with the Distribution Trustee's Third Omnibus (Substantive) Objection to Certain (I) Misclassified Claims, (II) Overstated and Misclassified Claims, (III) Overstated Claims, and (IV) No Liability Claims [Filed October 9, 2024; [Docket No. 1441](#)].

Status: The informal comments received from Itr, LLC have been resolved and will be reflected in a revised proposed form of order. The hearing with respect to the Response of Ron Whites Air Compressor Sales, Inc. is adjourned to **November 20, 2024 at 1:30 p.m. (ET)** for status only. **At the direction of the Court, this matter is adjourned to November 20, 2024 at 1:30 p.m. (ET).**

Dated: October 22, 2024

MORRIS JAMES LLP

/s/ Siena B. Cerra

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