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

In re:

Chapter 11

PRODIGY INVESTMENTS HOLDINGS, INC.,¹

Reorganized Debtor.

Case No. 23-11120 (BLS)

AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON JANUARY 15, 2025 AT 10:00 A.M. (ET)

** AT THE DIRECTION OF THE COURT, THIS HEARING IS CANCELLED **

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 February 19, 2025 at 10:00 a.m. (ET).

 The Distribution Trustee's First Omnibus (Non-Substantive) Objection to Certain (I) Amended and Superseded Claims, (II) Duplicate Claims, (III) Late Filed Claims, and (IV) Insufficient Documentation Claims [Filed May 28, 2024; 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

<u>Objection Deadline</u>: 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 December 31, 2024 as to Munich.

Objection/Response(s) Received:

A. Informal response received from United Steelworkers International Union.



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**.

- 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of BC Transit to The Distribution Trustee's First Omnibus (Non-Substantive) Objection to Certain (I) Amended and Superseded Claims, (II) Duplicate Claims, (III) Late Filed Claims, and (IV) Insufficient Documentation Claim [Filed June 7, 2024; <u>Docket No. 1358</u>].
- F. Missouri Department of Revenue's ("<u>Missouri</u>") Response to the Distribution Trustee's First Omnibus Objection [Filed June 18, 2024; <u>Docket No. 1371</u>].
- G. Response By The Tennessee Department of Revenue ("<u>Tennessee</u>") To The Distribution Trustee's First Omnibus Objection To Claims [Filed June 20, 2024; <u>Docket No. 1375</u>].
- H. Munich Electrification Systems GmbH's ("<u>Munich</u>") 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 ("<u>Munich Response and Motion</u>") [Filed June 20, 2024; <u>Docket No. 1377</u>].

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; <u>Docket No. 1365</u>].
- 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; <u>Docket No. 1387</u>].
- 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; <u>Docket No. 1391</u>].
- 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; <u>Docket No. 1436</u>].
- Status: All of the claims referenced in the First Omnibus Objection have been resolved or adjudicated, other than the claim of Munich [Claim No. 1108 and Claim No. 1275]. Subject to further extensions as agreed upon by the parties, the hearing with respect to the Munich Response and Motion has been adjourned to February 19, 2025 at 10:00 a.m. (ET).
- 3. 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; <u>Docket No. 1424</u>].

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; <u>Docket No. 1446</u>].

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; <u>Docket No. 1441</u>].
- B. Certification of Counsel Regarding Revised Order Sustaining 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 November 25, 2024; <u>Docket No. 1474</u>].
- C. Order Sustaining 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 December 2, 2024; <u>Docket</u> <u>No. 1477</u>].

Status: A revised order was submitted reflecting (i) the removal of claim number 1117 filed by Ron Whites Air Compressor Sales, Inc. pending resolution of same; and (ii) modification of the claim amount with respect to claim number 190 filed by Itr, LLC D/B/A All City Tow Service and has been entered by the Court sustaining the Third Omnibus Objection [Docket No. 1477], other than those continued matters. The hearing with respect to the Response of Ron Whites Air Compressor Sales, Inc. is adjourned to February 19, 2025 at 10:00 a.m. (ET) as to status only.

MATTERS GOING FORWARD:

4. Distribution Trustee's Fifth Omnibus (Substantive) Objection to Certain Contingent and Unliquidated Claims [Filed November 26, 2024; <u>Docket No. 1476</u>].

<u>Objection Deadline</u>: January 8, 2025 at 4:00 p.m.; extended to January 22, 2025 for Pierce County Public Transportation Benefit Area Corporation.

Objection/Response(s) Received:

- A. Informal response received from Pierce County Public Transportation Benefit Area Corporation.
- B. Declaration of Noor Zainal Abidin Regarding Department of Taxation, State of Hawaii's Response to Distribution Trustee's Fifth Omnibus (Substantive) Objection to Certain Contingent and Unliquidated Claims [Filed December 23, 2024; <u>Docket</u> <u>No. 1490</u>].
- C. Response in Opposition to Distribution Trustees Fifth Omnibus (Substantive) Objection to Certain Contingent and Unliquidated Claims Filed by The City of Philadelphia [Filed December 30, 2024; <u>Docket No. 1491</u>].
- D. Objection by City of Madison to Distribution Trustee's Fifth Omnibus (Substantive) Objection to Certain Claims [Filed January 8, 2025; Docket No. 1494].

Related Documents:

- A. Notice of Submission of Proofs of Claim in Connection with Distribution Trustee's Fifth Omnibus (Substantive) Objection to Certain Contingent and Unliquidated Claims [Filed December 30, 2024; <u>Docket No. 1492</u>].
- <u>Status</u>: The Distribution Trustee would like to adjourn the hearing on the objection to the Department of Taxation, State of Hawaii's claim number 1250 to February 19, 2025 at 10:00 a.m. (ET) to work on consensually resolving the objection and has been attempting to discuss this information with Hawaii's representative and will

continue to reach out. Subject to further extensions as agreed upon by the parties, the hearing with respect to the objection to Pierce County Public Transportation Benefit Area Corporation's claim number 1278 and is adjourned to February 19, 2025 at 10:00 a.m. (ET). At the direction of the Court, the hearing on the Trustee's Fifth Omnibus Objection is adjourned to February 19, 2025 at 10:00 a.m. (ET).

Dated: January 13, 2025

MORRIS JAMES LLP

<u>/s/ Siena B. Cerra</u> Eric J. Monzo (DE Bar No. 5214)

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