



**RESOLVED MATTER**

1. Debtors' Motion for an Order, Pursuant to Section 105 of the Bankruptcy Code and Bankruptcy Rule 9019, (I) Approving and Authorizing the Settlement Agreement With Respect to the Korean Supply Agreement by and Among the Debtors and LG Energy Solution, Ltd, and (II) Granting Related Relief [D.I. 767, 12/22/23]

Objection Deadline: January 5, 2024 at 4:00 p.m. (ET)

Related Documents:

- a. Certificate of No Objection [D.I. 831, 1/8/24]
- b. Order, Pursuant to Section 105 of the Bankruptcy Code and Bankruptcy Rule 9019, (I) Approving and Authorizing the Settlement Agreement With Respect to the Korean Supply Agreement by and Among the Debtors and LG Energy Solution, Ltd, and (II) Granting Related Relief [D.I. 836, 1/9/24]

Objections Filed: None

Status: An order has been entered.

**CONTESTED MATTER GOING FORWARD**

2. Debtors' Motion for Entry of an Order (A) Approving the Adequacy of the Disclosure Statement; (B) Approving the Solicitation and Notice Procedures With Respect to Confirmation of the Debtors' Joint Chapter 11 Plan of Reorganization; (C) Approving the Forms of Ballots and Notices in Connection Therewith; (D) Scheduling Certain Dates With Respect Thereto; and (E) Granting Related Relief [D.I. 793, 1/2/24]

Objection Deadline: January 16, 2024 at 4:00 p.m. (ET), *extended for the Office of the United States Trustee to January 17, 2024 at 4:00 p.m. (ET)*

Related Documents:

- a. Joint Chapter 11 Plan of Reorganization for Proterra Inc and its Debtor Affiliate [[D.I. 737, 12/17/23](#)]
- b. Disclosure Statement for Joint Chapter 11 Plan of Reorganization for Proterra Inc and its Debtor Affiliate [[D.I. 738, 12/17/23](#)]
- c. Notice of Hearing to Consider Adequacy of Disclosure Statement [[D.I. 739, 12/18/23](#)]
- d. Notice of Filing of Amended and Restated Plan Support Agreement [[D.I. 794, 1/2/24](#)]
- e. Notice of Filing of (I) First Amended Joint Chapter 11 Plan of Reorganization for Proterra Inc and its Debtor Affiliate and (II) Blackline Thereto [[D.I. 795, 1/2/24](#)]

- f. Notice of Filing of (I) First Amended Disclosure Statement for Joint Chapter 11 Plan of Reorganization for Proterra Inc. and its Debtor Affiliate and (II) Blackline Thereto [[D.I. 796, 1/2/24](#)]
- g. Notice of Filing Second Amended Chapter 11 Plan of Reorganization for Proterra Inc and its Debtor Affiliate and (II) Blackline Thereto [[D.I. 888, 1/15/24](#)]
- h. Notice of Filing Second Amended Disclosure Statement for Second Amended Joint Chapter 11 Plan of Reorganization for Proterra Inc and its Affiliate and (II) Blackline Thereto [[D.I. 889, 1/15/24](#)]
- i. Notice of Filing of Revised Proposed Order (A) Approving the Adequacy of the Disclosure Statement; (B) Approving the Solicitation and Notice Procedures With Respect to Confirmation of the Debtors' Joint Chapter 11 Plan of Reorganization; (C) Approving the Forms of Ballots and Notices in Connection Therewith; (D) Scheduling Certain Dates With Respect Thereto; and (E) Granting Related Relief [[D.I. 890, 1/15/24](#)]
- j. Notice of Filing of Exhibit to Proposed Order (A) Approving the Adequacy of the Disclosure Statement; (B) Approving the Solicitation and Notice Procedures With Respect to Confirmation of the Debtors' Joint Chapter 11 Plan of Reorganization; (C) Approving the Forms of Ballots and Notices in Connection Therewith; (D) Scheduling Certain Dates With Respect Thereto; and (E) Granting Related Relief [[D.I. 913, 1/18/24](#)]
- k. Debtors' Motion for an Order (I) Granting the Debtors Leave and Permission to File the Omnibus Reply in Support of Debtors' Motion for Entry of an Order (A) Approving the Adequacy of the Disclosure Statement; (B) Approving the Solicitation and Notice Procedures With Respect to Confirmation of the Debtors' Joint Chapter 11 Plan of Reorganization; (C) Approving the Forms of Ballots and Notices in Connection Therewith; (D) Scheduling Certain Dates With Respect Thereto; and (E) Granting Related Relief, and (II) Authorizing the Debtors to Exceed the Page Limit Requirement in Connection Therewith [D.I. 919, 1/22/24]**
- l. Notice of Filing of *Further* Revised Proposed Order (A) Approving the Adequacy of the Disclosure Statement; (B) Approving the Solicitation and Notice Procedures With Respect to Confirmation of the Debtors' Joint Chapter 11 Plan of Reorganization; (C) Approving the Forms of Ballots and Notices in Connection Therewith; (D) Scheduling Certain Dates With Respect Thereto; and (E) Granting Related Relief [D.I. 920, 1/22/24]**
- m. Notice of Filing of (I) Third Amended Joint Chapter 11 Plan of Reorganization for Proterra Inc and its Debtor Affiliate and (II) Blackline Thereto [D.I. 921, 1/22/24]**

**n. Notice of Filing of (I) Third Amended Disclosure Statement for Third Amended Joint Chapter 11 Plan of Reorganization for Proterra Inc and its Debtor Affiliate and (II) Blackline Thereto [D.I. 922, 1/22/24]**

Objections Filed:

- a. Informal Responses:
  - i. The Official Committee of Unsecured Creditors
  - ii. Anthelion Prodigy Co-Investment LP (f/k/a CSI Prodigy Co-Investment LP), Anthelion I Prodigy Holdco LP (f/k/a CSI I Prodigy Holdco LP), and Anthelion PRTA Co-Investment LP (f/k/a CSI PRTA Co-Investment LP)
  - iii. **Cigna Health and Life Insurance Company**
- b. Objection and Reservation of Rights of Lexon Insurance Company to the Debtors' Motion for Entry of an Order (A) Approving the Adequacy of the Disclosure Statement; (B) Approving the Solicitation and Notice Procedures With Respect to Confirmation of the Debtors' Joint Chapter 11 Plan of Reorganization; (C) Approving the Forms of Ballots and Notices in Connection Therewith; (D) Scheduling Certain Dates with Respect Thereto; and (E) Granting Related Relief [[D.I. 891, 1/16/24](#)]
- c. Limited Objection of the Southeastern Pennsylvania Transportation Authority to the Second Amended Disclosure Statement for Joint Chapter 11 Plan of Reorganization for Proterra Inc and its Debtor Affiliate [[D.I. 892, 1/16/24](#)]
- d. Objection of Cyress Jam, Court-Appointed Securities Class Action Lead Plaintiff, to (A) Adequacy of the Disclosure Statement; (B) Approving the Solicitation and Notice Procedures With Respect to Confirmation of the Debtors' Joint Chapter 11 Plan of Reorganization; (C) Approving the Forms of Ballots and Notices in Connection Therewith; (D) Scheduling Certain Dates With Respect Thereto; and (E) Granting Related Relief [[D.I. 894, 1/16/24](#)]
- e. Philadelphia Indemnity Insurance Company's Limited Objection, Joinder and Reservation of Rights With Respect to the Debtors' Second Amended Disclosure Statement [[D.I. 897, 1/16/24](#)]
- f. United States Trustee's Objection to Debtors' Motion for Entry of an Order (A) Approving the Adequacy of the Disclosure Statement; (B) Approving the Solicitation and Notice Procedures With Respect to Confirmation of the Debtors' Joint Chapter 11 Plan of Reorganization; (C) Approving the Forms of Ballots and Notices in Connection Therewith; (D) Scheduling Certain Dates With Respect Thereto; and (E) Granting Related Relief [[D.I. 900, 1/17/24](#)]

Status: Items (a)(i)–(iii), (b), (c), and (e) are resolved. This matter is going forward.

Dated: January 22, 2024  
Wilmington, Delaware

Respectfully submitted,

**YOUNG CONAWAY STARGATT &  
TAYLOR, LLP**

/s/ Shella Borovinskaya

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- and -

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