

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

In re:

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

Reorganized Debtor.

Chapter 11

Case No. 23-11120 (BLS)

**Response Deadline: July 31, 2024 at 4:00 p.m. (ET)**

**THE DISTRIBUTION TRUSTEE'S NOTICE OF  
PARTIAL SATISFACTION OF CLAIM NO. 1325 FILED BY  
DAIMLER TRUCK NORTH AMERICA LLC**

**PLEASE TAKE NOTICE** Steven Balasiano, in his capacity as the distribution trustee (the "Distribution Trustee") of the PTRA Distribution Trust (the "Distribution Trust"), by and through his undersigned counsel, hereby files this notice (the "Notice") identifying that the proof of claim filed by Daimler Truck North America LLC ("Daimler") assigned number 1325 (the "Partially Satisfied Claim") has been partially satisfied through fulfillment of obligations owed by the Debtors to Daimler. A schedule describing the Partially Satisfied Claim is attached hereto as Exhibit A.

**PLEASE TAKE FURTHER NOTICE** that the Distribution Trustee intends to designate on the register of claims maintained by Verita Global, f/k/a Kurtzman Carson Consultants LLC ("KCC"), the court-appointed noticing and claims agent for the Reorganized Debtor, the Partially Satisfied Claim as having been previously partially satisfied, while denoting the remaining amounts potentially owed in connection with the Partially Satisfied Claim. The Distribution Trustee is serving this Notice on Daimler and providing Daimler with an

<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.



opportunity to object to the Distribution Trustee's position that certain amounts have already been satisfied.

**PLEASE TAKE FURTHER NOTICE** that any party disputing the Distribution Trustee's position that the Partially Satisfied Claim has been partially satisfied as provided herein and on Exhibit A hereto must (i) file a written response (a "Response") to this Notice with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before July 31, 2024 at 4:00 p.m. (ET) (the "Response Deadline"), and (ii) serve such Response on the undersigned counsel to the Distribution Trustee on or before the Response Deadline. If no Response is timely filed and served by the Response Deadline, (i) Daimler and/or any disputing party will be deemed to have consented to this Notice and the Distribution Trustee's determinations with respect to the Partially Satisfied Claim, as set forth herein, and (ii) KCC shall immediately, and without further notice to any party (including Daimler), mark such Partially Satisfied Claim as satisfied to the extent set forth in Exhibit A.

**PLEASE TAKE FURTHER NOTICE** that if you file a Response, the Distribution Trustee will make a good faith reasonable effort to review the Partially Satisfied Claim in light of such Response to determine whether any asserted amounts were, in fact, not satisfied. If the parties are unable to reach a resolution, a hearing will be held on the matter at a date and time to be determined by the Distribution Trustee in their discretion, subject to the Court's availability.

**PLEASE TAKE FURTHER NOTICE** that the Distribution Trustee expressly reserves the right to amend, modify, or supplement this Notice, and reserves all rights to file objections to the remaining portion of the Partially Satisfied Claim listed on Exhibit A on a substantive or non-substantive basis.

Dated: July 17, 2024

**MORRIS JAMES LLP**

*/s/ Siena B. Cerra*

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**Exhibit A**

**Partially Satisfied Claim**

Exhibit A - Partially Satisfied Claim

Name of Claimant	Filed Date	Claim Number	Claim Amount	Satisfied Amount	Remaining Claim Amount	Reason
Daimler Truck North America LLC	3/5/2024	1325	\$86,698,394.03	\$6,495,417.12	\$80,202,976.91	Administrative claim portion of Claim No. 1325 was satisfied (see also D.I. 1390). The Distribution Trustee reserves all rights to object to the remaining claim amount, a general unsecured claim in the amount of \$80,202,976.91, on any applicable substantive or non-substantive grounds.