Docket #1612 Date Filed: 01/12/2026

Amyr Naeem LLP
5233 Bellaire Boulevard, # 246
Bellaire, Texas 77401

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CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

January 5, 2026

Office of the Clerk of the United States Bankruptcy Court
for the District of Delaware
Attn : Honorable Brendan L. Shannon
824 North Market Street, 3rd Floor
Wilmington, Delaware 19801

Dear Honorable Brendan L. Shannon,

I was somewhat cautious when I received the Notice of Deficiency documents because they were mailed from Pennsylvania. Nonetheless, the identifying case name & case number are :

Prodigy Investment Holdings, Inc.
Chapter 11 Reorganized Debtor
Case No. 23-11120 (BLS)

To the extent that a basis for relief is concerned, 11 U.S. Code § 502 of the Bankruptcy Code – Allowance of claims or interests provides that

(c) There shall be estimated for purpose of allowance under this section -
(2) any right to payment arising from a right to an equitable remedy for breach of performance.

Sincerely,

Amyr Naeem

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Amyr Naeem LLP
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Bellaire, Texas 77401

Office of the Clerk of the United States Bankruptcy Court
for the District of Delaware
Attn : Honorable Brendan L. Shannon
824 North Market Street, 3rd Floor
Wilmington, Delaware 19801

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CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

November 15, 2025

Dear Honorable Brendan L. Shannon,

I am a creditor and filed my claim as a governmental unit. I represent KPMG Peat Marwick (the name was subsequently changed to KPMG Consulting) and my own entity, Amyr Naeem LLP. My claim remains classified as Priority.

In our previous hearing on 11/20/2024, I made an argument to highlight the advancements Stellantis N.V. and Factorial Inc. have made to accelerate the future of electric vehicles with solid-state battery technology. This was an article published in Business Wire on 10/23/2024.

I also made the argument that Proterra's assets were split into three divisions and sold off. The Proterra Powered powertrain manufacturing business line would operate as an independent company within the Volvo Group. The transit bus manufacturing business line was sold to Phoenix Motorcars. The Proterra Energy business line which built charging systems for fleets of heavy-duty vehicles was purchased by Cowen Equity. These actions would be an advantage to me as creditor.

According to 11 U.S. Code §501 – Filing of proofs of claims or interest,

(a) A creditor or an indenture trustee may file a proof of claim. An equity security holder may file a proof of interest.

or

(e) A claim arising from the liability of a debtor (the Reorganized Debtors or others) for fuel use tax assessed consistent with the requirements of section 31705 of title 49 may be filed by the base jurisdiction designated pursuant to the International Fuel Tax Agreement (as defined in section 31701 of title 49) and, if so filed, shall be allowed as a single claim.

I previously submitted a government attorney certification and financial statements.

To the best of my knowledge and belief, PTRA.MX was trading at $2.58/share on the Mexico Stock Exchange on July 12, 2024.

Delaware law permits the garnishment of up to 15% of a debtor's net income. This would extend to the contents of the PTRA Distribution Trust.

Thank you.

Sincerely,

Amyr Naeem

Amyr Naeem

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE
824 N. Market Street, 3rd Floor
Wilmington, DE 19801
Ph: (302) 252-2900
www.deb.uscourts.gov

Case No.:

Debtor(s)

NOTICE OF DEFICIENCY

[x] The enclosed document, which was received by the Court on is being returned to you as it does not contain a case name or case number for the U.S. Bankruptcy Court, District of Delaware. If you intend for this document to be filed with the Court, please return it with an identifying case name and case number for the USBC, District of Delaware.

[ ] This case was closed on Should you desire to reopen the case, filling fee and requirements may apply. Please refer to appropriate Federal or Local Rules.

[ ] Claims or Amended Proof of Claims must be submitted on attach form.

[ ] There was a fee included with your document. However, no fee is due for this filing. The document has been processed, and the funds are being returned to you with this notice.

[ ] The enclosed mailing(s) were returned to the Court because of an incorrect address. Please resend to the appropriate party and notify the Court of the correct address.

[ ] Other: The case name and case number do not match what we have in our records.

Local Rules and Schedule of Fees are available on the Court's website at www.deb.uscourts.gov

I certify that this Notice of Deficiency was mailed on the date indicated below to:

Date:
11/21/2025

Deputy Clerk
/s/Ginger Mace

Stephen Grant, Clerk of Court