IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Prodigy Investment Holdings, Inc.,[1]	Case No. 23-11120 (BLS)
Reorganized Debtor.	**Re: Docket No. 1608**

CERTIFICATION OF COUNSEL REGARDING ORDER SUSTAINING THE DISTRIBUTION TRUSTEE'S NINTH OMNIBUS (SUBSTANTIVE) OBJECTION TO CERTAIN (I) MISCLASSIFIED AND OVERSTATED CLAIMS, (II) OVERSTATED CLAIMS, AND (III) UNLIQUIDATED CLAIMS

I, Siena B. Cerra, of Morris James LLP ("Morris James"), counsel for Steven Balasiano, in his capacity as the distribution trustee (the "Distribution Trustee") of the PTRA Distribution Trust (the "Distribution Trust") established in the above-captioned chapter 11 case of the reorganized debtor, hereby certifies as follows:

1. On December 12, 2025, *The Distribution Trustee's Ninth Omnibus (Substantive) Objection To Certain (I) Misclassified and Overstated Claims, (II) Overstated Claims, and (III) Unliquidated Claims* [D.I. 1608] (the "Ninth Omnibus Objection") was filed with the Court.

2. Responses to the Ninth Omnibus Objection were to be filed and served no later than January 2, 2026 at 4:00 p.m. (ET) (the "Objection Deadline").

3. Prior to the Objection Deadline, a formal response ("Response") was filed on behalf of Santa Clara Valley Transportation Authority ("Santa Clara VTA") [D.I. 1611].

4. The Distribution Trustee is working with Santa Clara VTA to resolve its Response to the Ninth Omnibus Objection. As such, Claim No. 1113 filed by Santa Clara VTA has been removed from the proposed form of order for the Ninth Omnibus Objection.

[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.

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5. Attached hereto as **Exhibit A** is a revised proposed form of order for the Ninth Omnibus Objection (the "Revised Order") removing (i) Santa Clara VTA from the unliquidated claim schedule and (ii) otherwise granting the Ninth Omnibus Objection. Attached as **Exhibit B** is a redline of the Revised Order showing the revisions compared to the Proposed Order that was filed with the Ninth Omnibus Objection.

6. Wherefore, the Distribution Trustee respectfully requests that the Court enter the Revised Order attached hereto as **Exhibit A** at its earliest convenience.

Dated: February 2, 2026
Wilmington, Delaware

MORRIS JAMES LLP

/s/ Siena B. Cerra

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Counsel to the Distribution Trust

EXHIBIT A

Revised Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Prodigy Investment Holdings, Inc.,[1]	Case No. 23-11120 (BLS)
Reorganized Debtor.	Jointly Administered
	Re: Docket No. 1608

ORDER SUSTAINING THE DISTRIBUTION TRUSTEE'S NINTH OMNIBUS (SUBSTANTIVE) OBJECTION TO CERTAIN (I) MISCLASSIFIED AND OVERSTATED CLAIMS, (II) OVERSTATED CLAIMS, AND (III) UNLIQUIDATED CLAIMS

Upon the objection (the "Objection")[2] of Steven Balasiano, in his capacity as the distribution trustee (the "Distribution Trustee") of the PTRA Distribution Trust (the "Distribution Trust") established in the above-captioned chapter 11 case (the "Chapter 11 Case") of the reorganized debtor ("Prodigy" or the "Reorganized Debtor"), to certain proofs of claim filed by the claimants (the "Claimants") on Schedule 1 (the "Misclassified and Overstated Claim"), Schedule 2 (the "Overstated Claim"), and Schedule 3 (the "Unliquidated Claim," and together with the Misclassified and Overstated Claim and the Overstated Claims, the "Disputed Claims"); and this Court having reviewed the Objection and the Balasiano Declaration; and this Court having determined that the relief requested in the Objection is in the best interests of the Distribution Trustee, the Distribution Trust, the Reorganized Debtor, its estate, its creditors, and other parties in interest and that the legal and factual bases set forth in the Objection establish just cause for the

[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] Capitalized terms not defined herein shall have the meanings ascribed to them in the Objection.

relief granted herein; and this Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and consideration of the Objection and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b)(2); and this Court having authority to enter a final order consistent with Article III of the United States Constitution; and venue being proper before this Court under 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Objection has been given and that no other or further notice is necessary; and upon all of the proceedings before this Court; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Objection is SUSTAINED as set forth herein.

2. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on the merits.

3. The Misclassified and Overstated Claim listed under the column titled "Claim Number" on the attached Schedule 1 is hereby reclassified and reduced in accordance with the column titled "Modified Claim Amount and Priority Status." The Misclassified and Overstated Claim listed in the column titled "Modified Claim Amount and Priority Status" on the attached Schedule 1 shall remain on the Claims Register as modified, unless such Misclassified and Overstated Claim is otherwise disallowed and/or modified by this Order or another order of this Court, subject to the Distribution Trustee's, or any other parties' further objections on any substantive or non-substantive grounds.

4. The Overstated Claim listed under the column titled "Claim Number" on the attached Schedule 2 is hereby reduced and modified in accordance with the columns titled "Modified Claim Amount and Priority Status." The Overstated Claim listed in the column titled "Modified Claim Amount and Priority Status" on the attached Schedule 2 shall remain on the Claims Register as modified, unless such Overstated Claim is otherwise disallowed and/or modified by this Order or another order of this Court, subject to the Distribution Trustee's, or any other parties' further objections on any substantive or non-substantive grounds.

5. The Unliquidated Claim listed under the column titled "Claim Number" on the attached Schedule 3 is hereby liquidated and fixed in the amount set forth in the column titled "Fixed General Unsecured Amount."

6. Notwithstanding Local Rule 3007-1(f)(iii), the rights of the Distribution Trustee or any other party to: (i) file subsequent objections to any claims listed on any of the Schedules annexed hereto on any ground, substantive or non-substantive (as permitted by the Court); (ii) amend, modify or supplement the Objection, including, without limitation, filing objections to further amended or newly-filed claims; (iii) seek to expunge or reduce any claim to the extent all or a portion of such claim has been paid; and (iv) settle any claim for less than the asserted amount, are expressly preserved. Additionally, should one or more of the grounds for objection stated in the Objection be overruled, the Distribution Trustee's and any other parties' rights to object to the Modified Claims on any other grounds are preserved. For the avoidance of doubt, leave from the requirements of Local Rule 3007-1(f)(iii) is hereby granted.

7. The objection to each claim, as addressed in the Objection and as set forth in the attached Schedules, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014 and Local Rule 3007-1. This Order shall be deemed a separate order with respect to each

such claim that is the subject of the Objection. Any stay of this Order pending appeal by any Claimants whose claims are subject to this Order shall only apply to the contested matter that involves such Claimant and shall not act to stay the applicability and/or finality of this Order with respect to any other contested matters addressed in the Objection and this Order.

8. Verita is authorized and directed to modify the Claims Register to comport with the relief granted by this Order.

9. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Distribution Trustee or any other party may have to enforce rights against the Claimants, including, but not limited to, any right of setoff.

10. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

11. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Order.

SCHEDULE 1

Misclassified and Overstated Claim

Proterra Inc., et al., (f/k/a Proterra Inc.)
Case No. 23-11120 (BLS)

Schedule 1 - Misclassified & Overstated Claims

	NAME	DATE FILED	Claim Number	Debtor	Claim Amount and Priority Status		Modified Claim Amount and Priority Status		REASON FOR MODIFICATION
1	TTI, Inc.	1/22/2024	1266	Proterra Inc. 23-11120	Administrative: Secured: Priority Unsecured: General Unsecured: Total Claim Amount	$185,880.17 $0.00 $0.00 $189,020.25 $347,900.42	Administrative: Secured: Priority Unsecured: General Unsecured: Total Claim Amount	$0.00 $0.00 $0.00 $37,026.20 $37,026.20	A portion of the claim ($185,880.17) was asserted as a section 503(b)(9) administrative claim for goods that were received by the Debtors within the 20-days prior to the Petition Date. According to the Debtors' Books and Records, claimant was paid $154,203.36 on 3/13/2024 via ACH payment (reference no. 491906) on account of the section 503(b)(9) administrative portion of the claim. Invoice 474982801, which was a post-petition invoice totaling $12,106.00, was paid in full. Two invoices totaling $1,975.20 were paid on 11/9/2023 via ACH payment (reference no. 490311). Invoice 493016101 was paid $103.00 on 9/8/2023 via ACH payment (reference no. 553837). The remaining invoices totaling $17,492.61 were for delivery of goods outside of the section 503(b)(9) 20-day window and therefore do not qualify for administrative expense priority status. Accordingly, $17,492.61 of the asserted administrative expense portion of the claim should be reclassified as a general unsecured claim. Additionally, $169,486.66 of the general unsecured claim was paid on various dates: (i) $16,054.26 paid on 6/23/2023 (reference no. 489449), (ii) $74,851.62 paid on 9/8/2023 (reference no. 553837), (iii) $5,257.63 paid on 9/12/2023 (reference no. 489360) (iv), $6,494.94 paid on 9/19/2023 (reference no. 489360), (v) $4,666.42 paid on 9/25/2023 (reference no. 489449), (vi) $20,720.68 paid on 10/03/2023 (reference no. 489570), (vii) $20,720.43 paid on 10/9/2023 (reference no. 489715); and (viii) $20,720.68 paid on 10/17/2023 (reference no. 489831). Accordingly, the claim should be reduced to the general unsecured claim amount of $37,026.20, consisting of $17,492.61 reclassified to General Unsecured and remaining balance of $19,533.59 for unpaid General Unsecured invoices.

SCHEDULE 2

Overstated Claim

Proterra Inc., et al., (f/k/a Proterra Inc.)
Case No. 23-11120 (BLS)

Schedule 2 - Overstated Claims

	NAME	DATE FILED	Claim Number	Debtor	Claim Amount and Priority Status		Modified Claim Amount and Priority Status		REASON FOR MODIFICATION
1	Arow Global Corp.	11/7/2023	840	Proterra Operating Company, Inc. 23-11121	Administrative: Secured: Priority Unsecured: General Unsecured: Total Claim Amount	$126,121.58 $0.00 $0.00 $939,683.35 $1,065,804.93	Administrative: Secured: Priority Unsecured: General Unsecured: Total Claim Amount	$0.00 $0.00 $0.00 $497,044.30 $497,044.30	A portion of the claim for $126,121.58 is asserted as a section 503(b)(9) administrative expense claim for goods that were received by the Debtors within the 20-day period prior to the Petition Date. According to the Debtors' Books and Records, claimant has been paid $126,121.58 on 3/13/2024 via ACH payment (reference no. 491854) on account of the section 503(b)(9) administrative portion of the claim. Additionally, a portion of the general unsecured claim is asserted for alleged cancellation fees of $442,639.05. According to the Debtors' Books and Records, the Debtor is not liable for the alleged cancellation fees. Claimant provided no evidence to support the assertion of cancellation fees. Accordingly, the claim should be reduced to the general unsecured claim amount of $497,044.30.

SCHEDULE 3

Unliquidated Claim

Proterra Inc., et al., (f/k/a Proterra Inc.)
Case No. 23-11120 (BLS)

Schedule 3 - Unliquidated

Name of Claimant	Claim Number	Date Claim was Filed	Debtor & Case #	Claim Asserted Amount and Priority	Fixed General Unsecured Amount	Basis to Fix and Allow

EXHIBIT B

Redline

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Prodigy Investment Holdings, Inc.,[1]	Case No. 23-11120 (BLS)
Reorganized Debtor.	Jointly Administered
	Re: Docket No. ~~—~~1608

ORDER SUSTAINING THE DISTRIBUTION TRUSTEE'S NINTH OMNIBUS (SUBSTANTIVE) OBJECTION TO CERTAIN (I) MISCLASSIFIED AND OVERSTATED CLAIMS, (II) OVERSTATED CLAIMS, AND (III) UNLIQUIDATED CLAIMS

Upon the objection (the "Objection")[2] of Steven Balasiano, in his capacity as the distribution trustee (the "Distribution Trustee") of the PTRA Distribution Trust (the "Distribution Trust") established in the above-captioned chapter 11 case (the "Chapter 11 Case") of the reorganized debtor ("Prodigy" or the "Reorganized Debtor"), to certain proofs of claim filed by the claimants (the "Claimants") on Schedule 1 (the "Misclassified and Overstated Claim"), Schedule 2 (the "Overstated Claim"), and Schedule 3 (the "Unliquidated Claim," and together with the Misclassified and Overstated Claim and the Overstated Claims, the "Disputed Claims"); and this Court having reviewed the Objection and the Balasiano Declaration; and this Court having determined that the relief requested in the Objection is in the best interests of the Distribution Trustee, the Distribution Trust, the Reorganized Debtor, its estate, its creditors, and other parties in interest and that the legal and factual bases set forth in the Objection establish just cause for the

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[2] Capitalized terms not defined herein shall have the meanings ascribed to them in the Objection.

relief granted herein; and this Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and consideration of the Objection and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b)(2); and this Court having authority to enter a final order consistent with Article III of the United States Constitution; and venue being proper before this Court under 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Objection has been given and that no other or further notice is necessary; and upon all of the proceedings before this Court; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Objection is SUSTAINED as set forth herein.

2. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on the merits.

3. The Misclassified and Overstated Claim listed under the column titled "Claim Number" on the attached Schedule 1 is hereby reclassified and reduced in accordance with the column titled "Modified Claim Amount and Priority Status." The Misclassified and Overstated Claim listed in the column titled "Modified Claim Amount and Priority Status" on the attached Schedule 1 shall remain on the Claims Register as modified, unless such Misclassified and Overstated Claim is otherwise disallowed and/or modified by this Order or another order of this Court, subject to the Distribution Trustee's, or any other parties' further objections on any substantive or non-substantive grounds.

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5. The Unliquidated Claim listed under the column titled "Claim Number" on the attached Schedule 3 is hereby liquidated and fixed in the amount set forth in the column titled "Fixed General Unsecured Amount."

6. Notwithstanding Local Rule 3007-1(f)(iii), the rights of the Distribution Trustee or any other party to: (i) file subsequent objections to any claims listed on any of the Schedules annexed hereto on any ground, substantive or non-substantive (as permitted by the Court); (ii) amend, modify or supplement the Objection, including, without limitation, filing objections to further amended or newly-filed claims; (iii) seek to expunge or reduce any claim to the extent all or a portion of such claim has been paid; and (iv) settle any claim for less than the asserted amount, are expressly preserved. Additionally, should one or more of the grounds for objection stated in the Objection be overruled, the Distribution Trustee's and any other parties' rights to object to the Modified Claims on any other grounds are preserved. For the avoidance of doubt, leave from the requirements of Local Rule 3007-1(f)(iii) is hereby granted.

7. The objection to each claim, as addressed in the Objection and as set forth in the attached Schedules, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014 and Local Rule 3007-1. This Order shall be deemed a separate order with respect to each

such claim that is the subject of the Objection. Any stay of this Order pending appeal by any Claimants whose claims are subject to this Order shall only apply to the contested matter that involves such Claimant and shall not act to stay the applicability and/or finality of this Order with respect to any other contested matters addressed in the Objection and this Order.

8. Verita is authorized and directed to modify the Claims Register to comport with the relief granted by this Order.

9. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Distribution Trustee or any other party may have to enforce rights against the Claimants, including, but not limited to, any right of setoff.

10. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

11. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Order.

SCHEDULE 1

Misclassified and Overstated Claim

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SCHEDULE 2

Overstated Claim

Proterra Inc., et al., (f/k/a Proterra Inc.)
Case No. 23-11120 (BLS)

Schedule 2 - Overstated Claims

	NAME	DATE FILED	Claim Number	Debtor	Claim Amount and Priority Status		Modified Claim Amount and Priority Status		REASON FOR MODIFICATION
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SCHEDULE 3

Unliquidated Claim

Proterra Inc., et al., (f/k/a Proterra Inc.)
Case No. 23-11120 (BLS)

Schedule 3 - Unliquidated

	Name of Claimant	Claim Number	Date Claim was Filed	Debtor & Case #	Claim Asserted Amount and Priority	Fixed General Unsecured Amount	Basis to Fix and Allow
~~1~~	~~Santa Clara Valley Transportation Authority~~	~~1113~~	~~11/13/2023~~	~~Proterra Inc. 23-11120~~	~~Administrative:~~ ~~Secured:~~ ~~Priority Unsecured:~~ ~~General Unsecured: $880,786.98 (unliquidated)~~ ~~Total Claim Amount $880,786.98 (unliquidated)~~	~~Administrative:~~ ~~Secured:~~ ~~Priority Unsecured:~~ ~~General Unsecured: $880,786.98~~ ~~Total Claim Amount $880,786.98~~	~~Claimant asserts rejection damages in an amount of $880,786.98. The proof of claim further notes that the "total amount is still under investigation." As of the date of this filing, claimant has not filed an amendment to the claim asserting any additional damages. Therefore, the claim should be liquidated and fixed at $880,786.98.~~