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.	**Obj. Deadline: March 13, 2026 at 4:00 p.m. (ET)** **Hearing Date: March 25, 2026 at 9:30 a.m. (ET)**

FOURTH MOTION OF THE DISTRIBUTION TRUSTEE FOR ENTRY OF AN ORDER EXTENDING THE CLAIMS OBJECTION DEADLINE THROUGH AND INCLUDING SEPTEMBER 8, 2026

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"), by and through its undersigned counsel, files this motion (the "Motion") for the entry of an order, substantially in the form attached to this Motion as **Exhibit A** (the "Proposed Order"), extending the deadline to object to claims from September 8, 2025 (the "Claims Objection Deadline") through and including September 8, 2026. In support of the Motion, the Distribution Trustee respectfully represents as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the "Court") has jurisdiction over this matter pursuant to 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 February 29, 2012. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). The Distribution Trustee confirms his consent, pursuant to Rule 7008 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 9013-1(f) of the *Local Rules of Bankruptcy Practice and*

[1] The Reorganized Debtor (defined herein) in this Chapter 11 Case (defined herein), 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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Procedure of the United States Bankruptcy Court For the District of Delaware (the "Local Rules"), to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory and legal predicates for the relief requested herein are sections 105(a), 502, and 503 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "Bankruptcy Code"), Bankruptcy Rule 9006, and Local Rules 9006-1 and 9006-2.

BACKGROUND

4. On August 7, 2023, Proterra Inc ("Proterra") and its affiliate, Proterra Operating Company, Inc. (together with Proterra, the "Debtors") filed voluntary petitions for relief in this Court, commencing the chapter 11 cases (the "Chapter 11 Cases").[2] Additional details regarding the Debtors and the facts and circumstances supporting the relief requested herein are set forth in the *Declaration of Gareth T. Joyce in Support of First Day Relief* [D.I. 16].

5. On September 5, 2023, the Court entered an Order [D.I. 187] (the "Bar Date Order") establishing (a) November 13, 2023 (the "Bar Date") as the last day for persons or entities other than governmental units to file claims against the Debtors that arose, or are deemed to have arisen, prior to the Petition Date, including claims arising under section 503(b)(9) of the Bankruptcy Code, and (b) February 3, 2024 as the last day for governmental units to file prepetition proofs of claim.

[2] For the avoidance of doubt, references to the "Debtors" and the "Chapter 11 Cases" pertain to the time before the entry of the Case Closing Order [D.I. 1233], as referenced herein, while references to the "Reorganized Debtor" and the "Chapter 11 Case" pertain to the period after the Effective Date (defined below) and entry of the Case Closing Order, as applicable.

6. On March 1, 2024, the Debtors filed the *Fifth Amended Joint Chapter 11 Plan of Reorganization for Proterra Inc and its Debtor Affiliate* [D.I. 1154] (the "Plan").

7. On March 6, 2024, the Court entered the *Findings of Fact, Conclusions of Law, and Order Confirming the Fifth Amended Joint Chapter 11 Plan of Reorganization of Proterra Inc and its Debtor Affiliate* [D.I. 1180] (the "Confirmation Order"), confirming the Plan and approving all supplements thereto, including the Distribution Trust Agreement [D.I. 1205] (the "Trust Agreement").

8. The Plan went effective on March 13, 2024 (the "Effective Date"). *See Notice of (I) Entry of Confirmation Order, (II) Occurrence of Effective Date, and (III) Final Deadlines for Filing Certain Claims* [D.I. 1208] (the "Notice of Effective Date").

9. Upon the Effective Date, the Distribution Trustee was appointed as the distribution trustee of the Distribution Trust pursuant to the Confirmation Order, Plan, and Trust Agreement. In accordance with the Plan and Trust Agreement, the Distribution Trustee has the authority to object to any claims filed against the Debtors. Plan, Art. VII.A.; Trust Agreement, Art. 2.1(c)(xii).

10. The Plan provides that objections to the amount or validity of any claim must be filed within 180 days of the Effective Date, or such later deadline as may be fixed by an order of this Court (the "Claims Objection Deadline"). Plan, Arts. I.A.22 and VII.A. The initial Claims Objection Deadline was September 9, 2024. The Claims Objection Deadline is currently March 9, 2026.

11. On August 14, 2024, the Distribution Trustee filed *The Distribution Trustee's Motion for an Order Extending the Claims Objection Deadline Through and Including March 10, 2025* [D.I. 1406] (the "First Extension Motion") prior to the expiration of the initial Claims

Objection Deadline. On August 30, 2024, the Court entered an order extending the Claims Objection Deadline through March 10, 2025 [D.I. 1418].

12. On February 24, 2025, the Distribution Trustee filed *The Distribution Trustee's Second Motion for an Order Extending the Claims Objection Deadline Through and Including September 8, 2025* [D.I. 1519] (the "Second Extension Motion") prior to the expiration of the Claims Objection Deadline. On March 13, 2025, the Court entered an order extending the Claims Objection Deadline through September 8, 2025 [D.I. 1525].

13. On August 25, 2025, the Distribution Trustee filed *The Distribution Trustee's Third Motion for an Order Extending the Claims Objection Deadline Through and Including March 9, 2026* [D.I. 1570] (the "Third Extension Motion") prior to the expiration of the Claims Objection Deadline. On September 10, 2025, the Court entered an order extending the Claims Objection Deadline through March 9, 2026 [D.I. 1587].

CLAIMS RECONCILIATION PROCESS

14. The register of claims (the "Claims Register") maintained by Verita Global, f/k/a Kurtzman Carson Consultants LLC ("KCC"), reflects that, as of the date of this Motion, approximately 1,417 proofs of claim of varying priority levels, including general unsecured, secured, priority and administrative (collectively, the "Filed Claims"), have been filed in these Chapter 11 Cases. In addition, approximately 571 claims were listed in the Debtors' schedules of assets and liabilities, filed in these Chapter 11 Cases on October 6, 2023 (collectively, the "Scheduled Claims"). As of the date of this Motion, nine motions or other requests for payment of administrative claims (the "Administrative Claim Requests") have been filed with the Court.

15. Since the Effective Date, the Distribution Trustee has been working to reconcile the Filed Claims, Scheduled Claims, and Administrative Claim Requests, expeditiously, with a view

towards maximizing recoveries for creditors with valid claims. Since the First Extension Motion, the Distribution Trustee has (i) filed nine omnibus claims objections, (ii) continued to review and negotiate resolutions of various Administrative Claim Requests, (iii) reviewed and negotiated resolutions of certain other administrative and priority claims, (iv) informally negotiated with claimants and settled and reconciled numerous disputed claims, and (v) filed an amended second notice of fully satisfied claims addressing 94 claims. Although the Distribution Trustee has been working diligently to reconcile and resolve the outstanding claims, substantial additional work remains. The Distribution Trustee will continue to work through the unresolved claims as quickly as possible under the circumstances, but requires additional time to do so.

RELIEF REQUESTED

16. The Distribution Trustee respectfully requests entry of an order extending the Claims Objection Deadline for a period of 180 days[3] through and including September 8, 2026.[4] The proposed extension is without prejudice to the rights of the Distribution Trustee to seek additional extensions of the Claims Objection Deadline, as appropriate.

BASIS FOR RELIEF

17. Sections 502 and 503 of the Bankruptcy Code contemplate that, claims will be challenged when appropriate and, if necessary, estimated. *See* 11 U.S.C. §§ 502(b)–(c), 503. The Plan vests the discretion to object to or seek estimation of Claims and Administrative Claim Requests in the Distribution Trustee on behalf of the Debtors' estates. *See* Plan, Art. VII.A. Although the Plan set an initial deadline by which such objections must be filed, the Plan contemplates an extension of the Claims Objection Deadline if such extension is ordered by this

[3] One-hundred and eighty days from March 9, 2026 is September 5, 2026, which is a Saturday.

[4] Pursuant to Local Rule 9006-2, the filing of this Motion prior to the expiration of the Claims Objection Deadline serves to automatically extend the Claims Objection Deadline until such time as the Court rules on this Motion. *See* Del. Bankr. LR 9006-2.

Court. *See, e.g.*, Plan, Art. I.A.22.

18. Bankruptcy Rule 9006(b) also provides for extensions of time for cause. Specifically:

> [W]hen an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion … with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order.

Fed R. Bankr. P. 9006(b)(1).

19. Finally, section 105 of the Bankruptcy Code provides that the "court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a).

20. The Distribution Trustee submits that an extension of the Claims Objection Deadline through and including September 8, 2026 is fundamental and necessary to allow for the required claims reconciliation, the efficient administration of the Distribution Trust, and is in the best interests of creditors. As discussed above, the Distribution Trustee has been working diligently since the Effective Date and has addressed many claims-related and other matters in a short amount of time.

21. Since the Effective Date, the Distribution Trustee has worked to address and reconcile the claims asserted against the Debtors and Administrative Claim Requests, in addition to the myriad of other day-to-day tasks required to be undertaken by the Distribution Trustee. To ensure the fair and proper administration of the Distribution Trust, the Distribution Trustee requires additional time to reconcile the remaining claims and Administrative Claim Requests, in an effort to reach a consensual resolution and, only if appropriate, to file objections.

22. The requested extension of the Claims Objection Deadline will not prejudice any claimant or other party in interest and will benefit creditors holding valid claims of all priority levels. Extension of the Claims Objection Deadline is also not sought for purposes of delay, nor will it affect any claimant's substantive defense(s) to any potential objection. Rather, the extension is intended to ensure that claims and Administrative Claim Requests will only be challenged after negotiations, if appropriate, and a meaningful review.

23. Absent the extension, creditors may suffer unnecessary and unfair prejudice due to the improper allowance of Administrative Claim Requests and claims. Either the Distribution Trustee will be precluded from challenging invalid, misclassified and/or overstated claims or Administrative Claim Requests, or he will be forced to lodge hastily prepared "protective" objections without the benefit of a full review and analysis by the Distribution Trustee and/or his respective professionals, as applicable.

24. The requested extension will not only allow the Distribution Trustee to properly review the remaining unresolved claims and Administrative Claim Requests and address the myriad of other responsibilities for which he is responsible, but will also conserve the limited resources of the Distribution Trust for the benefit of all creditors, by allowing the Distribution Trustee time to pursue settlement, and avoid the delay and expense of unnecessary objections and litigation.

RESERVATION OF RIGHTS

25. While the Distribution Trustee will endeavor to resolve all of the remaining unresolved claims and Administrative Claim Requests within the time of the requested extension, the Distribution Trustee reserves all of his rights to seek further extensions of the Claims Objection Deadline, as appropriate, as well as to object to and/or seek estimation of particular claims.

NOTICE

26. Notice of this Motion will be provided to (i) the Office of the United States Trustee for the District of Delaware, and (ii) all parties who have filed a renewed notice of appearance and request for service of papers pursuant to Local Rule 2002-1(b) and the Confirmation Order. A copy of this Motion is also available on the Reorganized Debtor's case website at https://veritaglobal.net/proterra. In light of the procedural nature of the post-confirmation relief requested herein, the Distribution Trustee submits that such notice is sufficient under the circumstances and that no other or further notice is required.

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WHEREFORE, the Distribution Trustee respectfully requests that this Court enter the Proposed Order: (i) extending the Claims Objection Deadline through and including September 8, 2026, without prejudice to the rights of the Distribution Trustee to seek additional extensions of such deadline as appropriate; and (ii) granting such other and further relief as the Court may deem just and proper.

Dated: February 27, 2026

MORRIS JAMES LLP

/s/ Siena B. Cerra
Eric J. Monzo (DE Bar No. 5214)
Brya M. Keilson (DE Bar No. 4643)
Siena B. Cerra (DE Bar No. 7290)
3205 Avenue North Blvd., Suite 100
Wilmington, DE 19803
Telephone: (302) 888-6800
Facsimile: (302) 571-1750
E-mail: emonzo@morrisjames.com
bkeilson@morrisjames.com
scerra@morrisjames.com

-and-

LOWENSTEIN SANDLER LLP
Jeffrey L. Cohen, Esq. (admitted *pro hac vice*)
Eric S. Chafetz, Esq. (admitted *pro hac vice*)
Daniel B. Besikof, Esq. (admitted *pro hac vice*)
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 262-6700
Facsimile: (212) 262-7402
E-mail: jcohen@lowenstein.com
echafetz@lowenstein.com
dbesikof@lowenstein.com

Counsel to the Distribution Trust

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.	**Obj. Deadline: March 13, 2026 at 4:00 p.m. (ET)** **Hearing Date: March 25, 2026 at 9:30 a.m. (ET)**

NOTICE OF FOURTH MOTION OF THE DISTRIBUTION TRUSTEE FOR ENTRY OF AN ORDER EXTENDING THE CLAIMS OBJECTION DEADLINE THROUGH AND INCLUDING SEPTEMBER 8, 2026

PLEASE TAKE NOTICE that on February 27, 2026, the distribution trustee (the "Distribution Trustee") of the PTRA Distribution Trust (the "Distribution Trust"), by and through its undersigned counsel, filed the *Fourth Motion of the Distribution Trustee for Entry of an Order Extending the Claims Objection Deadline Through and Including September 8, 2026* (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Motion must be filed and received before **March 13, 2026 at 4:00 p.m. (ET) (the "Objection Deadline")** with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, you must serve a copy of the response on undersigned counsel.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Motion will be held on **March 25, 2026, at 9:30 a.m. (ET)** before the Honorable Brendan L. Shannon, United States Bankruptcy Judge for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom 1, Wilmington, Delaware 19801.

IF NO OBJECTIONS ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH SUCH PLEADINGS WITHOUT FURTHER NOTICE OR HEARING.

[Signature Page to Follow]

[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.

Dated: February 27, 2026

MORRIS JAMES LLP

/s/ Siena B. Cerra
Eric J. Monzo (DE Bar No. 5214)
Brya M. Keilson (DE Bar No. 4643)
Siena B. Cerra (DE Bar No. 7290)
3205 Avenue North Blvd., Suite 100
Wilmington, DE 19803
Telephone: (302) 888-6800
Facsimile: (302) 571-1750
E-mail: emonzo@morrisjames.com
bkeilson@morrisjames.com
scerra@morrisjames.com

-and-

LOWENSTEIN SANDLER LLP
Jeffrey L. Cohen, Esq. (admitted *pro hac vice*)
Eric S. Chafetz, Esq. (admitted *pro hac vice*)
Daniel B. Besikof, Esq. (admitted *pro hac vice*)
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 262-6700
Facsimile: (212) 262-7402
E-mail: jcohen@lowenstein.com
echafetz@lowenstein.com
dbesikof@lowenstein.com

Counsel to the Distribution Trust

EXHIBIT A

Proposed 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.	**Re: Docket No. ____**

ORDER EXTENDING THE CLAIMS OBJECTION DEADLINE THROUGH AND INCLUDING SEPTEMBER 8, 2026

Upon the motion (the "Motion")[2] of the distribution trustee (the "Distribution Trustee") of the PTRA Distribution Trust established in the above-captioned chapter 11 case of the reorganized debtor, for an order extending the deadline to object to Claims through and including September 8, 2026; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; venue being proper before this Court; consideration of the Motion and the relief requested being a core proceeding pursuant to 28 U.S.C. § 157(b); due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; the Court having found and determined that the relief sought in the Motion is in the best interests of the creditors of the Debtors' estates and all parties in interest, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein;

[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 otherwise defined herein shall have the meaning ascribed in the Motion or, if not defined in the Motion, such meanings as ascribed to them in the Plan (as defined in the Motion).

2. The Claims Objection Deadline shall be, and hereby is, extended through and including September 8, 2026 as to all Filed Claims, Scheduled Claims, and Administrative Claim Requests, including claims that are payable from the Claims Reserve;

3. This Order is without prejudice to the rights of the Distribution Trustee to seek further extensions of the Claims Objection Deadline; and

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