Docket #1659 Date Filed: 07/24/2026

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.	

CERTIFICATION OF COUNSEL REGARDING STIPULATION AND ORDER REGARDING BRIEFING SCHEDULE FOR SANTA CLARA VALLEY TRANSPORTATION AUTHORITY'S MOTION FOR LEAVE TO AMEND CLAIM NO. 1113

The undersigned hereby certifies that Steven Balasiano, in his capacity as the distribution trustee of the PTRA Distribution Trust established in the above-captioned chapter 11 case of the reorganized debtor, agrees to the proposed form of Stipulated Scheduling Order attached hereto as **Exhibit A**. The undersigned counsel respectfully requests that the Court enter the attached Stipulated Scheduling Order at its earliest convenience.

[*Remainder of Page Intentionally Left Blank*]

[1] The Reorganized Debtor in this Chapter 11 Case (defined herein), along with the last four digits of the Reorganized Debtor's federal tax identification number, is: Prodigy Investment 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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Dated: July 24, 2026
Wilmington, Delaware

MORRIS JAMES LLP

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EXHIBIT A

Stipulated Scheduling 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: D.I. ___**

STIPULATION AND ORDER REGARDING BRIEFING SCHEDULE FOR SANTA CLARA VALLEY TRANSPORTATION AUTHORITY'S MOTION FOR LEAVE TO AMEND CLAIM NO. 1113

This stipulation and order ("Stipulation and Order") is made and entered into by and between, Steven Balasiano, in his capacity as the distribution trustee (the "Distribution Trustee" or "Trustee") of the PTRA Distribution Trust (the "Distribution Trust" or "Trust") established in the above-captioned chapter 11 case (the "Chapter 11 Case") of the reorganized debtor ("Prodigy" or the "Reorganized Debtor"),[2] and Santa Clara Valley Transportation Authority ("SCVTA," together with the Distribution Trustee, the "Parties"). The Parties hereby stipulate and agree as follows:

WHEREAS, on December 12, 2025, the Distribution Trustee filed the *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"), which, *inter alia*, sought to fix Claim No. 1113, filed by SCVTA, at $880,786.98;

[1] The Reorganized Debtor in this Chapter 11 Case (defined herein), along with the last four digits of the Reorganized Debtor's federal tax identification number, is: Prodigy Investment Holdings, Inc. (9565). The location of the Reorganized Debtor's service address is: 3350 Virginia St., 2nd Floor, Miami, FL 33133.

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

WHEREAS, on January 2, 2026, SCVTA filed its Response to the Ninth Omnibus Objection [D.I. 1611] (the "Response"), which purported to amend Claim No. 1113 and assert an increased claim in the total amount of $8,506,160.24;

WHEREAS, on June 19, 2026, the Distribution Trustee filed a Reply in Support of the Ninth Omnibus Objection as to Claim No. 1113 (the "Reply"), contesting, among other things, SCVTA's ability to amend its claim without first seeking and obtaining leave of Court;

WHEREAS, on June 25, 2026, the Court held a status conference (the "Status Conference") before the Honorable Brendan L. Shannon regarding the Ninth Omnibus Objection as it relates to SCVTA's Claim No. 1113;

WHEREAS, at the Status Conference, the Court directed that the threshold question of whether SCVTA should be granted leave to amend Claim No. 1113 must be resolved through motion practice before the Court will consider the substantive merits of the claim dispute, and the Court indicated that this threshold procedural question is appropriately resolved without an evidentiary hearing on the underlying merits;

WHEREAS, in order to implement the Court's guidance and establish an orderly briefing schedule, the Parties, by and through their undersigned counsel, have conferred and agreed to the schedule set forth below for briefing SCVTA's Motion for Leave to Amend Claim No. 1113, subject to the Court's approval;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned Parties, through their respective undersigned counsel, subject to the approval of the Court, as follows:

Motion for Leave to Amend Deadline. SCVTA shall file and serve its motion for leave to amend Claim No. 1113 (the "Motion for Leave to Amend" or "Motion"), together with a proposed

amended proof of claim, on or before August 7, 2026. The Motion shall be limited to the threshold procedural question of whether SCVTA should be permitted to amend Claim No. 1113, and if so to what extent (the "Threshold Issue").

Response Deadline. The Distribution Trustee shall file and serve its response in opposition to the Motion for Leave to Amend (the "Response") on or before August 21, 2026.

Reply Deadline. SCVTA may file and serve a reply in further support of the Motion for Leave to Amend (the "Reply") on or before September 11, 2026 at 4:00 p.m. prevailing Eastern Time in accordance with Local Rule 9006-1(d). The Reply shall be limited to matters raised in the Response and shall not exceed ten (10) pages.

Hearing. A hearing on the Motion for Leave to Amend (the "Hearing") shall be held on September 16, 2026 at 1:00 p.m. (ET). The Hearing shall be limited to the Threshold Issue; no evidence or argument regarding the substantive merits of the underlying claim, including issues of breach, causation, or damages, shall be presented at the Hearing.

Modification. The deadlines set forth in this Stipulation and Order may be modified by written agreement of the Parties, without further order of the Court. The Parties shall promptly advise the Court, in writing, of any occurrence or circumstance that may necessitate the adjournment of the Hearing.

Jurisdiction. This Court retains jurisdiction over all matters arising from or relating to the interpretation, implementation, or enforcement of this Stipulation and Order.

Reservation of Rights. Nothing in this Stipulation and Order shall be deemed to constitute, or shall operate as, a waiver of, or prejudice to, any Party's rights, claims, objections, defenses, or arguments with respect to Claim No. 1113, the Ninth Omnibus Objection, the Response, or the Reply, all of which are expressly preserved and reserved. Without limiting the foregoing, the

Distribution Trustee expressly reserves the right, in the event that one or more of the grounds for objection asserted in the Ninth Omnibus Objection is withdrawn, overruled, or otherwise not sustained, to assert additional or alternative objections to Claim No. 1113, or to any other proof of claim, on any ground, whether substantive or procedural, in accordance with applicable law and the orders of this Court.

Counterparts. This Stipulation and Order may be executed in counterparts, including by electronic or facsimile signature, each of which shall be deemed an original and all of which, when taken together, shall constitute one and the same instrument.

Notice. The Distribution Trustee shall only be required to serve this Stipulation and Order and Agreed Order on: (a) the U.S. Trustee; (b) SCVTA, and (c) any party that has requested notice pursuant to Bankruptcy Rule 2002.

[*Remainder of page is intentionally left blank*]

STIPULATED and AGREED on this 24th day of July 2026

Dated: New York, New York
July 24, 2026

LOWENSTEIN SANDLER LLP

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Counsel to the Distribution Trustee

Dated: San Jose, California
July 24, 2026

GREENFIELD LLP

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