

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

	)	
In re:	)	Chapter 11
	)	
PROTERRA INC, <i>et al.</i> , <sup>1</sup>	)	Case No. 23-11120 (BLS)
	)	
Debtors.	)	(Jointly Administered)
	)	

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON NOVEMBER 1, 2023 AT 10:00 A.M. (ET)**

**NO MATTERS ARE GOING FORWARD. THE HEARING IS CANCELLED WITH THE PERMISSION OF THE COURT.**

**RESOLVED MATTERS**

1. Motion of NSK Industries, Inc. for an Order Allowing Section 503(b)(9) Administrative Expense Claim and Requiring Immediate Payment Thereof [D.I. 238, 9/14/23]

Objection Deadline: September 27, 2023 at 4:00 p.m. (ET)

Related Documents:

- a. Notice of Withdrawal of Motion [D.I. 431, 10/17/23]

Objections Filed:

- a. Debtors’ Objection to NSK Industries, Inc’s Motion for an Order Allowing Section 503(b)(9) Administrative Expenses Claim and Requiring Immediate Payment Thereof [D.I. 285, 9/27/23]

Status: This matter has been resolved and withdrawn.

2. Debtors’ Application for Entry of an Order Authorizing the Debtors to Retain and Employ KPMG LLP to Provide Audit and Tax Restructuring Services to the Debtors and Debtors in Possession, Effective as of the Petition Date [D.I. 356, 10/11/23]

Objection Deadline: October 25, 2023 at 4:00 p.m. (ET)

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Protterra Inc (1379); and Protterra Operating Company, Inc. (8459). The location of the Debtors’ service address is: 1815 Rollins Road, Burlingame, California 94010



Related Documents:

- a. Certificate of No Objection [D.I. 479, 10/26/23]
- b. Order Authorizing the Debtors to Retain and Employ KPMG LLP to Provide Audit and Tax Restructuring Services to the Debtors and Debtors in Possession Effective as of the Petition Date [D.I. 483, 10/27/23]

Objections Filed: None

Status: An order has been entered.

**ADJOURNED MATTERS**

3. Motion of GS Operating, LLC d/b/a Gexpro Services for Allowance and Payment of Administrative Expense Claim Under 11 U.S.C. § 503(b)(9) [D.I. 122, 8/24/23]

Objection Deadline: August 31, 2023 at 4:00 p.m. (ET)

Related Documents:

- a. Notice of Lien Perfection [D.I. 120, 8/24/23]
- b. Notice of Demand for Reclamation by GS Operating, LLC d/b/a Gexpro Services [D.I. 240, 9/15/23]
- c. Supplemental Notice of Lien Perfection [D.I. 241]

Objections Filed:

- a. Debtors' Omnibus (I) Objection to Gexpro's Motion (A) for Allowance and Payment of Administrative Claim and (B) to Compel Assumption or Rejection of Executory Contract and (II) Reply to Gexpro's Limited Objection to Debtors' Bidding Procedures Motion [D.I. 161, 8/31/23]
- b. Joinder to Debtors' Omnibus (I) Objection to Gexpro's Motion (A) for Allowance and Payment of Administrative Claim and (B) to Compel Assumption or Rejection of Executory Contract and (II) Reply to Gexpro's Limited Objection to Debtors' Bidding Procedures Motion [D.I. 162, 9/1/23]

Status: This matter is adjourned to November 28, 2023 at 10:00 a.m. (ET).

4. Motion of GS Operating, LLC d/b/a Gexpro Services to Compel Assumption or Rejection of Executory Contract [D.I. 123, 8/24/23]

Objection Deadline: August 31, 2023 at 4:00 p.m. (ET)

Related Documents: None.

Objections Filed:

- a. Debtors' Omnibus (I) Objection to Gexpro's Motion (A) for Allowance and Payment of Administrative Claim and (B) to Compel Assumption or Rejection of Executory Contract and (II) Reply to Gexpro's Limited Objection to Debtors' Bidding Procedures Motion [D.I. 161, 8/31/23]
- b. Joinder to Debtors' Omnibus (I) Objection to Gexpro's Motion (A) for Allowance and Payment of Administrative Claim and (B) to Compel Assumption or Rejection of Executory Contract and (II) Reply to Gexpro's Limited Objection to Debtors' Bidding Procedures Motion [D.I. 162, 9/1/23]

Status: This matter is adjourned to November 28, 2023 at 10:00 a.m. (ET).

5. Debtors' Motion for an Order Authorizing and Approving Procedures for the Compromise, Settlement, and Payment of *De Minimis* Disputed Claims [D.I. 124, 8/24/23]

Objection Deadline: August 31, 2023 at 4:00 p.m. (ET), extended for the Office of the United States Trustee to September 1, 2023 at 4:00 p.m. (ET) and extended for the Committee to September 4, 2023 at 4:00 p.m. (ET)

Related Documents:

- a. Re-Notice of Motion and Hearing [D.I. 185, 9/5/23]

Objections Filed:

- a. United States Trustee's Objection to Debtors' Motion for an Order Authorizing and Approving Procedures for the Compromise, Settlement, and Payment of *De Minimis* Disputed Claims [D.I. 211. 9/6/23]

Status: This matter is adjourned to a date and time to be determined.

*[Remainder of page intentionally left blank]*

Dated: October 30, 2023  
Wilmington, Delaware

Respectfully submitted,

**YOUNG CONAWAY STARGATT &  
TAYLOR, LLP**

/s/ Shella Borovinskaya

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Pauline K. Morgan (No. 3650)  
Andrew L. Magaziner (No. 5426)  
Shella Borovinskaya (No. 6758)  
Rodney Square  
1000 North King Street  
Wilmington, Delaware 19801  
Telephone: (302) 571-6600  
Facsimile: (302) 571-1253  
Email: pmorgan@ycst.com  
amagaziner@ycst.com  
sborovinskaya@ycst.com

- and -

**PAUL, WEISS, RIFKIND,  
WHARTON & GARRISON LLP**

Paul M. Basta (admitted *pro hac vice*)  
Robert A. Britton (admitted *pro hac vice*)  
Michael J. Colarossi (admitted *pro hac vice*)  
1285 Avenue of the Americas  
New York, New York 10019  
Tel: (212) 373-3000  
Fax: (212) 757-3990  
Email: pbasta@paulweiss.com  
rbritton@paulweiss.com  
mcolarossi@paulweiss.com

*Counsel to the Debtors and  
Debtors in Possession*