

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

In re:

FISKER INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

**Re: Docket No. 947**

**CERTIFICATE OF NO OBJECTION REGARDING LIQUIDATING TRUSTEE'S  
MOTION FOR ENTRY OF AN ORDER FURTHER EXTENDING THE TIME PERIOD  
TO FILE NOTICES OF REMOVAL OF CLAIMS AND CAUSES OF  
ACTION RELATED TO THE CHAPTER 11 CASES**

The undersigned counsel to Matthew Dundon, solely in his capacity as the Liquidating Trustee (the "Liquidating Trustee") of the Fisker Liquidating Trust (the "Liquidating Trust"), hereby certifies that, as of the date hereof, no answer, objection, or other responsive pleading has been filed or received to the *Liquidating Trustee's Motion for Entry of an Order Further Extending the Time Period to File Notices of Removal of Claims and Causes of Action Related to the Chapter 11 Cases* [Docket No. 947] (the "Motion") filed with the United States Bankruptcy Court for the District of Delaware (the "Court") on April 8, 2025. Pursuant to the Notice of Motion, objections to the Motion were to be filed and served no later than April 22, 2025 at 4:00 p.m. (ET) (the "Objection Deadline").

The Objection Deadline has passed, and no objections or other responsive pleading to the Motion appear on the docket or were served upon the undersigned counsel. It is therefore

<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers or Delaware file numbers, are as follows: Fisker Inc. (0340); Fisker Group Inc. (3342); Fisker TN LLC (6212); Blue Current Holding LLC (6668); Platinum IPR LLC (4839); and Terra Energy Inc. (0739). The address of the debtors' corporate headquarters is 14 Centerpointe Drive, La Palma, CA 90623.



respectfully requested that the Court enter the Proposed Order attached hereto as **Exhibit A** at the earliest convenience of the Court.

Dated: April 23, 2025  
Wilmington, Delaware

**COLE SCHOTZ P.C.**

/s/ Justin R. Alberto

**COLE SCHOTZ P.C.**

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*Co-Counsel to the Liquidating Trustee*

**Exhibit A**

**Proposed Form of Order**

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FOR THE DISTRICT OF DELAWARE**

In re:

FISKER, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

**Re: D.I. 947**

**ORDER FURTHER EXTENDING  
THE TIME PERIOD TO FILE NOTICES OF REMOVAL OF CLAIMS  
AND CAUSES OF ACTION RELATED TO THE CHAPTER 11 CASES**

THIS MATTER having come before the Court upon the *Liquidating Trustee's Motion for Entry of an Order Further Extending the Time Period to File Notices of Removal of Claims and Causes of Action Related to the Debtors' Chapter 11 Cases* (the "**Motion**"), as more fully described in the Motion; and the Court having reviewed the Motion; and the Court finding that: (i) 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; (ii) venue is appropriate pursuant to 28 U.S.C. §§ 1408 and 1409; (iii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and a final order may be entered on this matter under Article III of the U.S. Constitution; (iv) notice of the Motion was sufficient under the circumstances and no other or further notice is necessary; and (v) a sound business purpose exists for the relief granted herein; and the Court having determined 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;

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of their respective employer identification numbers or Delaware file numbers, are as follows: Fisker Inc. (0340); Fisker Group Inc. (3342); Fisker TN LLC (6212); Blue Current Holding LLC (6668); Platinum IPR LLC (4839); and Terra Energy Inc. (0739). The address of the Debtors' corporate headquarters is 14 Centerpointe Drive, La Palma, CA 90623.

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The Removal Deadline<sup>2</sup> is further extended through and including August 13, 2025.
3. The relief granted herein is without prejudice to (i) the Liquidating Trustee's (or any successors-in-interest's) right to seek further extensions of the Removal Deadline and (ii) any position the Liquidating Trustee (or his successors-in-interest) may take regarding whether Bankruptcy Code section 362 applies to stay any given Action.
4. The Liquidating Trustee and his authorized representatives are authorized and empowered to take any and all actions necessary to implement the terms of this Order.
5. The terms and conditions of this Order shall be immediately enforceable and effective upon its entry.
6. This Court retains jurisdiction over all matters arising from or related to the interpretation, implementation and enforcement of this Order.