

**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. 956

**CERTIFICATION OF COUNSEL REGARDING LIQUIDATING TRUSTEE'S SIXTH  
OMNIBUS OBJECTION (SUBSTANTIVE) PURSUANT TO 11 U.S.C. § 502, FED. R.  
BANKR. P. 3007 AND LOCAL RULE 3007-1 TO CERTAIN MISCLASSIFIED CLAIMS**

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 as follows:

1. On April 14, 2025, the Liquidating Trustee filed the *Liquidating Trustee's Sixth Omnibus Objection (Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain Misclassified Claims* [Docket No. 956] (the "Objection") with the United States Bankruptcy Court for the District of Delaware (the "Court"). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Objection (the "Proposed Order").

2. Pursuant to the Notice of Objection, responses to the Objection were required to have been filed with the Court and served on undersigned counsel no later than 4:00 p.m. (ET) on May 5, 2025 (the "Response Deadline"). The Notice of Objection also provided notice that a hearing on the Objection is scheduled for May 29, 2025 at 10:00 a.m. (ET) (the "Hearing").

<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.



3. Prior to the Response Deadline, Paul B Tuzo IV (“Tuzo”) filed a response to the Objection [Docket No. 986] (the “Tuzo Response”) with regard to Claim No. 2083 (the “Tuzo Claim”). The Tuzo Response will go forward at the May 29, 2025 Hearing.

4. Other than the Tuzo Objection, the Liquidating Trustee has not received any other responses or informal comments to the Objection, and none have been filed on the docket.

5. Accordingly, the Liquidating Trustee respectfully requests that the Court enter the revised proposed form of order (the “Revised Proposed Order”) sustaining the Objection as to all claims other than the Tuzo Claim, which has been removed from the Revised Proposed Order.

6. The Revised Proposed Order is attached hereto as **Exhibit 1**.

7. A redline comparing the Revised Proposed Order against the Proposed Order filed with the Objection is attached hereto as **Exhibit 2**.

8. The Liquidating Trustee respectfully requests that the Court enter the Revised Proposed Order at its earliest convenience.

*[Remainder of Page Intentionally Left Blank]*

Dated: May 6, 2025  
Wilmington, Delaware

**COLE SCHOTZ P.C.**

/s/ Justin R. Alberto

Justin R. Alberto (No. 5126)  
Melissa M. Hartlipp (No. 7063)  
500 Delaware Avenue, Suite 200  
Wilmington, DE 19801  
Telephone: (302) 652-3131  
Facsimile: (302) 652-3117  
Email: jalberto@coleschotz.com  
mhartlipp@coleschotz.com

-and-

**ASK LLP**

Jason C. DiBattista (admitted *pro hac vice*)  
Brigette G. McGrath (admitted *pro hac vice*)  
2600 Eagan Woods Drive, Suite 400  
St. Paul, Minnesota 55121  
Telephone: (651) 406-9665  
Facsimile: (651) 406-9676  
Email: jdibattista@askllp.com  
bmcgrath@askllp.com

and-

Marianna Udem (admitted *pro hac vice*)  
60 East 42nd Street, 46th Floor  
New York, New York 10165  
Telephone: (212) 267-7342  
Facsimile: (212) 918-3427  
Email: mudem@askllp.com

*Co-Counsel to the Liquidating Trustee*

**Exhibit 1**

**Revised Proposed Order**

**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: D.I. 956

**ORDER GRANTING LIQUIDATING TRUSTEE'S SIXTH OMNIBUS OBJECTION  
(SUBSTANTIVE) PURSUANT TO 11 U.S.C. § 502, FED. R. BANKR. P. 3007 AND  
LOCAL RULE 3007-1 TO CERTAIN RECLASSIFIED CLAIMS**

THIS MATTER having come before the Court upon the *Liquidating Trustee's Sixth Omnibus Objection (Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain Reclassified Claims* (the "**Objection**"),<sup>2</sup> filed by Matthew Dundon, solely in his capacity as the Liquidating Trustee (the "**Liquidating Trustee**") of the Fisker Liquidating Trust, seeking entry of an order pursuant to 11 U.S.C. § 502, Bankruptcy Rule 3007 and Local Rule 3007-1 reclassifying the priority status of the Disputed Claims listed on **Schedule 1** annexed hereto; and it appearing that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §1334; and it appearing that this is a core proceeding pursuant to 28 U.S.C. §157; and it appearing that venue of this proceeding is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and adequate notice of the Objection and opportunity for response having been given; and it appearing that no other notice need be given; and the Court having considered the Objection, the Disputed

---

<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.

<sup>2</sup> Any capitalized term used but not otherwise defined herein shall have the meaning ascribed to it in the Objection.

Claims listed on **Schedule 1** annexed hereto, and any responses thereto; and upon the record herein; and, after due deliberation and sufficient cause appearing therefore, it is FOUND AND DETERMINED that:

- A. This Objection is a core proceeding under 28 U.S.C. § 157(b)(2).
- B. Each holder of a Disputed Claim listed on **Schedule 1** attached hereto was properly and timely served with a copy of the Objection, this Order, the accompanying exhibit, and the notice.
- C. Any entity known to have an interest in the Disputed Claims subject to the Objection has been afforded reasonable opportunity to respond to, or be heard regarding, the relief requested in the Objection.
- D. Each of the Disputed Claims on **Schedule 1** hereto asserts an incorrect priority status.

IT IS HEREBY ORDERED ADJUDGED AND DECREED that:

- 1. The Objection is GRANTED as set forth herein.
- 2. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on its merits.
- 3. Each of the Disputed Claims on **Schedule 1** hereto is hereby reclassified to the classification status set forth on **Schedule 1**.
- 4. The Liquidating Trustee's rights to further object at a later date and on any basis to Disputed Claims on **Schedule 1** hereto are fully preserved.
- 5. The official claims register in these Chapter 11 Cases shall be modified in accordance with this Order.

6. The Liquidating Trustee's rights and the rights of other parties in interest to file additional objections to the Disputed Claims or any other Claims (filed or not) which may be asserted against the Debtors and/or the Liquidating Trust, are preserved. Additionally, should one or more of the grounds of objection stated in the Objection be dismissed, the Liquidating Trustee's rights and the rights of other parties in interest to object on other stated grounds or on any other grounds that the Liquidating Trustee or other parties in interest may discover are further preserved.

7. Notwithstanding the possible applicability of Bankruptcy Rules 6004, 7062, 9014 or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry. All time periods set forth in the Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

8. This Court shall retain jurisdiction over the Liquidating Trustee and the claimants whose Claims are subject to the Objection with respect to any matters related to or arising from the Objection and the implementation of this Order.

Schedule 1 - Misclassified Claims

#	Claimant Name	Claim No.	Asserted Claim Amount	Asserted Claim Priority	Reclassified Claim Amount	Reclassified Claim Priority	Reason for Reclassification
1	Abounasseri, Khosrow	1768	\$69,000.00	Secured	\$69,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
2	Andrawes, Peter	1710	\$70,000.00	Secured	\$70,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
3	Aribisala, Clement	2106	\$45,000.00	Secured	\$45,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
4	Bolton, Andrew	2310	\$76,669.22	Secured	\$76,669.22	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
5	Buyer, David	2124	\$687.09	Priority	\$687.09	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(8) has no legal basis. The supporting detail shows this Claim relates to taxes owed by the claimant.
6	Cao, Kelly	2135	Total Claim: \$80,681.00 Secured: \$75,431.00 Priority: \$5,250.00	Secured/Priority	\$80,681.00	General Unsecured	According to the Debtors' Books and Records, the portion of the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support of its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
7	Carley, Pat	1649	Total Claim: \$73,000.00 Secured: \$39,000.00 Priority \$73,00.00	Secured/Priority	\$73,000.00	General Unsecured	According to the Debtors' Books and Records, the portion of the liability asserted as secured has no legal basis. The Claimant holds no lien to secured the claim, and the claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, Claimant fails to attach sufficient documentation to support of its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
8	Carroll, Jessica	1252	\$50,000.00	Priority	\$50,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(7) has no legal basis. The supporting detail shows this claim relates to a completed vehicle purchase. Additionally, Claimant fails to attach sufficient documentation to support of its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a)(7).
9	Caveness, Bryant	1615	\$77,941.36	Secured	\$77,941.36	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
10	Chupinin, Vitaliy	1592	Total Claim: \$11,298.00 Priority: \$1,500.00	Priority	Total Claim: \$11,298.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(7) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support of its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a)(7).

#	Claimant Name	Claim No.	Asserted Claim Amount	Asserted Claim Priority	Reclassified Claim Amount	Reclassified Claim Priority	Reason for Reclassification
11	Dexter, Deborah	2966	\$40,000.00	Secured	\$40,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
12	Edmonds, Bradley	1140	Total Claim: \$250.00 Secured: \$250.00 Priority \$250.00	Secured/Priority	\$250.00	Priority	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
13	Enriquez, Jesus	2612	\$77,000.00	Secured	\$77,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
14	Fernandez, Cuauhtemoc	3178	Total Claim: \$67,500.00 Secured: \$67,500.00 Priority \$67,500.00	Secured/Priority	\$67,500.00	General Unsecured	According to the Debtors' Books and Records, the portion of the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
15	Firer, Inna	1798	Total Claim: \$35,000.00 Secured: \$35,000.00 Priority: \$15,000.00	Secured/Priority	\$35,000.00	General Unsecured	According to the Debtors' Books and Records, the portion of the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, Claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
16	Frere, Juliane	2354	\$63,276.36	Priority	\$63,276.36	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(7) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a)(7).
17	Galus, James	790	\$250.00	Secured	\$250.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The Claimant holds no lien to secured the claim, and the claim is therefore ineligible for secured status.
18	Goldstein, Robert	3086	Total Claim: UNLIQUIDATED Secured: \$47,261.37	Secured	UNLIQUIDATED	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
19	Goldwyn, David	1691	Total Claim: \$50,000.00 Secured: \$20,000.00 Priority \$30,000.00	Secured/Priority	\$50,000.00	General Unsecured	According to the Debtors' Books and Records, the portion of the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
20	Grosse, Javier	3687	\$2,144.57	Priority	\$2,144.57	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(7) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a)(7).

#	Claimant Name	Claim No.	Asserted Claim Amount	Asserted Claim Priority	Reclassified Claim Amount	Reclassified Claim Priority	Reason for Reclassification
21	Guedez, Jean-Luc	2788	\$64,152.86	Secured	\$64,152.86	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The Claimant holds no lien to secured the claim, and the claim is therefore ineligible for secured status.
22	Hamilton, Bryan	2709	\$61,560.75	Secured	\$61,560.75	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
23	Haran, Robert	2295	\$54,791.26	Secured	\$54,791.26	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
24	Issac, Jacob	3041	\$62,863.00	Secured	\$62,863.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
25	John, Saji	2754	\$76,815.52	Secured	\$76,815.52	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
26	Kim, Ron	2869	Secured: \$48,000.00 Priority \$16,650.00	Secured/Priority	\$64,650.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
27	Landis, Ned	1732	\$3,800.00	Priority	\$3,800.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a).
28	Lindquist, Mark	2601	Total Claim: \$68,507.61 Secured \$68,507.61 Priority \$20,750.00	Secured/Priority	\$68,507.61	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
29	Lindsley, Philip	2324	\$75,000.00	Secured	\$75,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
30	Maddox, Scott	739	\$2,250.00	Priority	\$2,250.00	Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a).
31	Maske, Doug	2895	\$74,000.00	Priority	\$74,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a).

#	Claimant Name	Claim No.	Asserted Claim Amount	Asserted Claim Priority	Reclassified Claim Amount	Reclassified Claim Priority	Reason for Reclassification
32	Mistry, Himanshu	1865	Total Claim: \$70,000.00 Secured: \$70,000.00 Priority: \$5,250.00	Secured/Priority	\$70,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
33	Momin, Rumesha	2147	\$20,000.00	Secured	\$20,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The Claimant holds no lien to secured the claim, and the claim is therefore ineligible for secured status.
34	Morillo, Jesus	2934	Total Claim: \$85,764.76 Secured: \$80,000.76 Priority: \$8,000.00	Secured/Priority	\$85,764.76	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
35	Mueller, Trudi	3436	\$30,000.00	Secured	\$30,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
36	Paakki, Travis	698	Total Claim: \$750.00 Secured: \$250.00	Secured	\$750.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a).
37	Paquette, Lisa	1185	Total Claim: \$1,000.00 Secured: \$1,000.00 Priority \$1,000.00	Secured/Priority	\$1,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
38	Pendyala, Venkata	1523	\$55,000.00	Secured	\$55,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
39	Phanthapannha, Charles	3253	\$71,136.50	Secured	\$71,136.50	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
40	Prasad, Ramnarayan	2930	\$15,000.00	Secured	\$15,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
41	Reyes, Stephanie	1177	\$5,000.00	Admin/Priority	\$5,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as administrative and/or priority claim pursuant to 11 U.S.C. §§ 503(b)(9) and 507(a) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. §§ 503(b)(9) and/or 507(a).
42	Rossi, George	1547	\$74,249.00	Secured	\$74,249.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.

#	Claimant Name	Claim No.	Asserted Claim Amount	Asserted Claim Priority	Reclassified Claim Amount	Reclassified Claim Priority	Reason for Reclassification
43	Roth, George	2735	\$30,000.00	Secured	\$30,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
44	San, Chris	1249	\$70,000.00	Secured	\$70,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
45	Schrameck, Martha	2360	\$7,500.00	Priority	\$7,500.00	Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a).
46	Siegel, John	2150	Total Claim: \$30,000.00 Secured \$30,000.00 Priority \$5,000.00	Secured/Priority	\$30,000.00	General Unsecured	According to the Debtors' Books and Records, the portion of the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a)(7).
47	Smith, Andrew	3278	\$40,000.00	Secured	\$40,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
48	Snell, Barbara	2743	\$80,000.00	Priority	\$80,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a).
49	Subramanian, Venkatesh	1439	Total Claim: \$94,089.36 Secured: \$65,409.48 Priority \$65,409.48	Secured/Priority/Unsecured	\$94,089.36	General Unsecured	According to the Debtors' Books and Records, the portion of the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
50	Sulik, Kenneth Jr.	1056	\$1,000.00	Secured	\$1,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
51	Thomas, Sheeba	2004	\$76,765.52	Secured	\$76,765.52	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
52	Thomas, Siby	1471	\$33,281.87	Secured	\$33,281.87	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
54	Ullman, Steven	1619	\$79,704.00	Secured	\$79,704.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.

#	Claimant Name	Claim No.	Asserted Claim Amount	Asserted Claim Priority	Reclassified Claim Amount	Reclassified Claim Priority	Reason for Reclassification
55	Unterseher, Reginald	2358	\$58,499.00	Secured	\$58,499.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
56	Vemuri, Vijay	1966	\$70,000.00	Secured	\$70,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
57	Vigil, Daniel	3524	\$57,425.96	Secured	\$57,425.96	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
58	Wiggins, Jeffrey	2113	\$60,328.00	Secured	\$60,328.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
59	Williamson, Heather	728	\$1,000.00	Priority	\$1,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(7) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a)(7).
60	Yu, Jonathan	3249	\$30,000.00	Secured	\$30,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
61	Zim, Craig	1609	\$70,000.00	Secured	\$70,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.

**Exhibit 2**

**Redline**

**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: D.I. ~~956~~ [956](#)

**ORDER GRANTING LIQUIDATING TRUSTEE'S SIXTH OMNIBUS OBJECTION  
(SUBSTANTIVE) PURSUANT TO 11 U.S.C. § 502, FED. R. BANKR. P. 3007 AND  
LOCAL RULE 3007-1 TO CERTAIN RECLASSIFIED CLAIMS**

THIS MATTER having come before the Court upon the *Liquidating Trustee's Sixth Omnibus Objection (Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain Reclassified Claims* (the "**Objection**"),<sup>2</sup> filed by Matthew Dundon, solely in his capacity as the Liquidating Trustee (the "**Liquidating Trustee**") of the Fisker Liquidating Trust, seeking entry of an order pursuant to 11 U.S.C. § 502, Bankruptcy Rule 3007 and Local Rule 3007-1 reclassifying the priority status of the Disputed Claims listed on **Schedule 1** annexed hereto; and it appearing that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §1334; and it appearing that this is a core proceeding pursuant to 28 U.S.C. §157; and it appearing that venue of this proceeding is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and adequate notice of the Objection and opportunity for response having been given; and it appearing that no other notice need be given; and the Court having considered the

<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.

<sup>2</sup> Any capitalized term used but not otherwise defined herein shall have the meaning ascribed to it in the Objection.

Objection, the Disputed Claims listed on **Schedule 1** annexed hereto, and any responses thereto; and upon the record herein; and, after due deliberation and sufficient cause appearing therefore, it is FOUND AND DETERMINED that:

A. This Objection is a core proceeding under 28 U.S.C. § 157(b)(2).

B. Each holder of a Disputed Claim listed on **Schedule 1** attached hereto was properly and timely served with a copy of the Objection, this Order, the accompanying exhibit, and the notice.

C. Any entity known to have an interest in the Disputed Claims subject to the Objection has been afforded reasonable opportunity to respond to, or be heard regarding, the relief requested in the Objection.

D. Each of the Disputed Claims on **Schedule 1** hereto asserts an incorrect priority status.

IT IS HEREBY ORDERED ADJUDGED AND DECREED that:

1. The Objection is GRANTED as set forth herein.

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

3. Each of the Disputed Claims on **Schedule 1** hereto is hereby reclassified to the classification status set forth on **Schedule 1**.

4. The Liquidating Trustee's rights to further object at a later date and on any basis to Disputed Claims on **Schedule 1** hereto are fully preserved.

5. The official claims register in these Chapter 11 Cases shall be modified in accordance with this Order.

6. The Liquidating Trustee's rights and the rights of other parties in interest to file additional objections to the Disputed Claims or any other Claims (filed or not) which may be asserted against the Debtors and/or the Liquidating Trust, are preserved. Additionally, should one or more of the grounds of objection stated in the Objection be dismissed, the Liquidating Trustee's rights and the rights of other parties in interest to object on other stated grounds or on any other grounds that the Liquidating Trustee or other parties in interest may discover are further preserved.

7. Notwithstanding the possible applicability of Bankruptcy Rules 6004, 7062, 9014 or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry. All time periods set forth in the Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

8. This Court shall retain jurisdiction over the Liquidating Trustee and the claimants whose Claims are subject to the Objection with respect to any matters related to or arising from the Objection and the implementation of this Order.

Schedule 1 - Misclassified Claims

#	Claimant Name	Claim No.	Asserted Claim Amount	Asserted Claim Priority	Reclassified Claim Amount	Reclassified Claim Priority	Reason for Reclassification
1	Abounasseri, Khosrow	1768	\$69,000.00	Secured	\$69,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
2	Andrawes, Peter	1710	\$70,000.00	Secured	\$70,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
3	Aribisala, Clement	2106	\$45,000.00	Secured	\$45,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
4	Bolton, Andrew	2310	\$76,669.22	Secured	\$76,669.22	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
5	Buyer, David	2124	\$687.09	Priority	\$687.09	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(8) has no legal basis. The supporting detail shows this Claim relates to taxes owed by the claimant.
6	Cao, Kelly	2135	Total Claim: \$80,681.00 Secured: \$75,431.00 Priority: \$5,250.00	Secured/Priority	\$80,681.00	General Unsecured	According to the Debtors' Books and Records, the portion of the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support of its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
7	Carley, Pat	1649	Total Claim: \$73,000.00 Secured: \$39,000.00 Priority \$73,00.00	Secured/Priority	\$73,000.00	General Unsecured	According to the Debtors' Books and Records, the portion of the liability asserted as secured has no legal basis. The Claimant holds no lien to secured the claim, and the claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, Claimant fails to attach sufficient documentation to support of its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
8	Carroll, Jessica	1252	\$50,000.00	Priority	\$50,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(7) has no legal basis. The supporting detail shows this claim relates to a completed vehicle purchase. Additionally, Claimant fails to attach sufficient documentation to support of its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a)(7).
9	Caveness, Bryant	1615	\$77,941.36	Secured	\$77,941.36	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
10	Chupinin, Vitaliy	1592	Total Claim: \$11,298.00 Priority: \$1,500.00	Priority	Total Claim: \$11,298.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(7) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support of its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a)(7).

#	Claimant Name	Claim No.	Asserted Claim Amount	Asserted Claim Priority	Reclassified Claim Amount	Reclassified Claim Priority	Reason for Reclassification
11	Dexter, Deborah	2966	\$40,000.00	Secured	\$40,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
12	Edmonds, Bradley	1140	Total Claim: \$250.00 Secured: \$250.00 Priority \$250.00	Secured/Priority	\$250.00	Priority	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
13	Enriquez, Jesus	2612	\$77,000.00	Secured	\$77,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
14	Fernandez, Cuauhtemoc	3178	Total Claim: \$67,500.00 Secured: \$67,500.00 Priority \$67,500.00	Secured/Priority	\$67,500.00	General Unsecured	According to the Debtors' Books and Records, the portion of the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
15	Firer, Inna	1798	Total Claim: \$35,000.00 Secured: \$35,000.00 Priority: \$15,000.00	Secured/Priority	\$35,000.00	General Unsecured	According to the Debtors' Books and Records, the portion of the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, Claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
16	Frere, Juliane	2354	\$63,276.36	Priority	\$63,276.36	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(7) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a)(7).
17	Galus, James	790	\$250.00	Secured	\$250.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The Claimant holds no lien to secured the claim, and the claim is therefore ineligible for secured status.
18	Goldstein, Robert	3086	Total Claim: UNLIQUIDATED Secured: \$47,261.37	Secured	UNLIQUIDATED	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
19	Goldwyn, David	1691	Total Claim: \$50,000.00 Secured: \$20,000.00 Priority \$30,000.00	Secured/Priority	\$50,000.00	General Unsecured	According to the Debtors' Books and Records, the portion of the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
20	Grosse, Javier	3687	\$2,144.57	Priority	\$2,144.57	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(7) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a)(7).

#	Claimant Name	Claim No.	Asserted Claim Amount	Asserted Claim Priority	Reclassified Claim Amount	Reclassified Claim Priority	Reason for Reclassification
21	Guedez, Jean-Luc	2788	\$64,152.86	Secured	\$64,152.86	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The Claimant holds no lien to secured the claim, and the claim is therefore ineligible for secured status.
22	Hamilton, Bryan	2709	\$61,560.75	Secured	\$61,560.75	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
23	Haran, Robert	2295	\$54,791.26	Secured	\$54,791.26	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
24	Issac, Jacob	3041	\$62,863.00	Secured	\$62,863.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
25	John, Saji	2754	\$76,815.52	Secured	\$76,815.52	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
26	Kim, Ron	2869	Secured: \$48,000.00 Priority \$16,650.00	Secured/Priority	\$64,650.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
27	Landis, Ned	1732	\$3,800.00	Priority	\$3,800.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a).
28	Lindquist, Mark	2601	Total Claim: \$68,507.61 Secured \$68,507.61 Priority \$20,750.00	Secured/Priority	\$68,507.61	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
29	Lindsley, Philip	2324	\$75,000.00	Secured	\$75,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
30	Maddox, Scott	739	\$2,250.00	Priority	\$2,250.00	Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a).
31	Maske, Doug	2895	\$74,000.00	Priority	\$74,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a).

#	Claimant Name	Claim No.	Asserted Claim Amount	Asserted Claim Priority	Reclassified Claim Amount	Reclassified Claim Priority	Reason for Reclassification
32	Mistry, Himanshu	1865	Total Claim: \$70,000.00 Secured: \$70,000.00 Priority: \$5,250.00	Secured/Priority	\$70,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
33	Momin, Rumesha	2147	\$20,000.00	Secured	\$20,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The Claimant holds no lien to secure the claim, and the claim is therefore ineligible for secured status.
34	Morillo, Jesus	2934	Total Claim: \$85,764.76 Secured: \$80,000.76 Priority: \$8,000.00	Secured/Priority	\$85,764.76	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
35	Mueller, Trudi	3436	\$30,000.00	Secured	\$30,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
36	Paakki, Travis	698	Total Claim: \$750.00 Secured: \$250.00	Secured	\$750.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a).
37	Paquette, Lisa	1185	Total Claim: \$1,000.00 Secured: \$1,000.00 Priority \$1,000.00	Secured/Priority	\$1,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
38	Pendyala, Venkata	1523	\$55,000.00	Secured	\$55,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
39	Phanthapannha, Charles	3253	\$71,136.50	Secured	\$71,136.50	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
40	Prasad, Ramnarayan	2930	\$15,000.00	Secured	\$15,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
41	Reyes, Stephanie	1177	\$5,000.00	Admin/Priority	\$5,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as administrative and/or priority claim pursuant to 11 U.S.C. §§ 503(b)(9) and 507(a) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. §§ 503(b)(9) and/or 507(a).
42	Rossi, George	1547	\$74,249.00	Secured	\$74,249.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.

#	Claimant Name	Claim No.	Asserted Claim Amount	Asserted Claim Priority	Reclassified Claim Amount	Reclassified Claim Priority	Reason for Reclassification
43	Roth, George	2735	\$30,000.00	Secured	\$30,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
44	San, Chris	1249	\$70,000.00	Secured	\$70,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
45	Schrameck, Martha	2360	\$7,500.00	Priority	\$7,500.00	Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a).
46	Siegel, John	2150	Total Claim: \$30,000.00 Secured \$30,000.00 Priority \$5,000.00	Secured/Priority	\$30,000.00	General Unsecured	According to the Debtors' Books and Records, the portion of the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a)(7).
47	Smith, Andrew	3278	\$40,000.00	Secured	\$40,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
48	Snell, Barbara	2743	\$80,000.00	Priority	\$80,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a).
49	Subramanian, Venkatesh	1439	Total Claim: \$94,089.36 Secured: \$65,409.48 Priority \$65,409.48	Secured/Priority/Unsecured	\$94,089.36	General Unsecured	According to the Debtors' Books and Records, the portion of the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the claim is therefore ineligible for secured status. Additionally, according to the Debtors' Books and Records, the portion of the liability asserted as priority has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to secured status or priority status pursuant to 11 U.S.C. § 507(a).
50	Sulik, Kenneth Jr.	1056	\$1,000.00	Secured	\$1,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
51	Thomas, Sheeba	2004	\$76,765.52	Secured	\$76,765.52	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
52	Thomas, Siby	1471	\$33,281.87	Secured	\$33,281.87	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
53	<del>Tuzo, Paul</del>	<del>2083</del>	<del>\$80,464.00</del>	<del>Secured</del>	<del>\$80,464.00</del>	<del>General Unsecured</del>	<del>According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.</del>
54	Ullman, Steven	1619	\$79,704.00	Secured	\$79,704.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.

#	Claimant Name	Claim No.	Asserted Claim Amount	Asserted Claim Priority	Reclassified Claim Amount	Reclassified Claim Priority	Reason for Reclassification
55	Unterseher, Reginald	2358	\$58,499.00	Secured	\$58,499.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
56	Vemuri, Vijay	1966	\$70,000.00	Secured	\$70,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
57	Vigil, Daniel	3524	\$57,425.96	Secured	\$57,425.96	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
58	Wiggins, Jeffrey	2113	\$60,328.00	Secured	\$60,328.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
59	Williamson, Heather	728	\$1,000.00	Priority	\$1,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(7) has no legal basis. Additionally, claimant fails to attach sufficient documentation to support its claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a)(7).
60	Yu, Jonathan	3249	\$30,000.00	Secured	\$30,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.
61	Zim, Craig	1609	\$70,000.00	Secured	\$70,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The claimant holds no lien to secure the Claim, and the Claim is therefore ineligible for secured status.