

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

In re:

FISKER INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

**THE LIQUIDATING TRUSTEE'S
WITNESS AND EXHIBIT LIST FOR HEARING SCHEDULED FOR
MAY 29, 2025 AT 10:00 A.M. (PREVAILING EASTERN TIME)**

Matthew Dundon, solely in his capacity as the Liquidating Trustee (the "Liquidating Trustee") of the Fisker Liquidating Trust (the "Liquidating Trust"), respectfully files this Witness and Exhibit List identifying the individuals that the Liquidating Trustee may call as witnesses and the exhibits that the Liquidating Trustee may introduce into evidence at the hearing to be held on May 29, 2025 at 10:00 a.m. (ET) (the "Hearing").

Witnesses

The Liquidating Trustee identifies the below individuals as persons whom the Liquidating Trustee may call to testify at the Hearing. The Liquidating Trustee reserves the right to cross-examine any witness identified by any other party and to call any other party's witness as a rebuttal witness.

1. Rick Wright, Managing Director at Dundon Advisors, will testify regarding:
 - (i) *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 "Sixth Omnibus Objection");

¹ 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.



- (ii) The *Liquidating Trustee’s Seventh Omnibus Objection (Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain (I) No Liability; and (II) Misclassified Claims* [Docket No. 976] (the “Seventh Omnibus Objection”); and
- (iii) Any matters raised by another party on cross-examination.

The Liquidating Trustee intends to present Mr. Wright’s direct testimony by declaration, including the Declaration of Rick Wright in Support of Liquidating Trustee’s Seventh Omnibus Objection (Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain (I) No Liability; and (II) Misclassified Claims [Docket No. 976-3] and Declaration of Rick Wright in Support of Liquidating Trustee’s Seventh Omnibus Objection (Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain (I) No Liability; and (II) Misclassified Claims [Docket No. 976-3]. Mr. Wright will be available for cross-examination.

- 2. Any witness listed or called by any other party;
- 3. Rebuttal witnesses, as necessary; and
- 4. The Liquidating Trustee reserves the right to cross-examine any witness called by another party.

Exhibits²

The Liquidating Trustee designates the following exhibits that may be used at the Hearing:

Exhibit	Description	Docket No./ Bates No.
1	Certificate of Service regarding the Sixth Omnibus Objection	958
2	Certificate of Service regarding the Seventh Omnibus Objection	985

² Certain documents may be confidential pursuant to the *Final Order (I) Waiving the Requirement to File a List of Equity Holders and (II) Authorizing Debtors to Redact Certain Personal Information* [D.I. 290] and if so, will be offered, if at all, under seal or in redacted form.

Exhibit	Description	Docket No./ Bates No.
3	Proof of Claim No. 1275 of Giovanni Barone	
4	Proof of Claim No. 3827 of Rakesh Bhat	
5	Proof of Claim No. 449 and 468 of Simas Ceckauskas	
6	Proof of Claim No. 468 of Simas Ceckauskas	
7	Proof of Claim No. 480 of Virag Desai	
8	Proof of Claim No. 2011 of John Giarritta	
9	Proof of Claim No. 3986 of Adiah Jones	
10	Proof of Claim No. 3870 of Osnalza Ortiz	
11	Proof of Claim No. 510 of Linda Selvidge	
12	Proof of Claim No. 2083 of Paul Tuzo	
	Any document or pleading filed in the above-captioned cases	
	Any exhibit necessary for impeachment and/or rebuttal purposes	
	Any exhibit identified or offered by any other party	

Reservation of Rights

The Liquidating Trustee reserves all rights, including without limitation, the right to amend, revise or supplement this Witness and Exhibit List at any time, to designate additional witnesses and exhibits, to call any person identified as a witness by any other party or introduce any document identified as an exhibit by any other party, and to offer additional witnesses and

exhibits at the Hearing for purposes of impeachment, rebuttal or in response to witnesses or evidence offered by any other party.

Dated: May 23, 2025

COLE SCHOTZ P.C.

/s/ Justin R. Alberto

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