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US BANKRUPTCY COURT
DISTRICT OF DELAWARE

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:
Fisker, Inc., et al.,
Debtors.

Chapter 11
Case No. 24-11390 (TMH)
Hearing Date: September 3, 2025 at 11:00 a.m. (ET)
Objection Deadline: August 22, 2025 at 4:00 p.m. (ET)

RESPONSE OF ERIC DENNIS MCGREGOR TO THE LIQUIDATING
TRUSTEE'S ELEVENTH OMNIBUS OBJECTION (NON-SUBSTANTIVE)
TO CERTAIN LATE-FILED CLAIMS

TO THE HONORABLE THOMAS M. HORAN, UNITED
STATES BANKRUPTCY JUDGE:

I, Eric Dennis McGregor, hereby submit this response (the
"Response") to the Liquidating Trustee's Eleventh
Omnibus Objection (Non-Substantive) to Certain Late-
Filed Claims (the "Objection"), and respectfully state the
following:

1. Claimant Information:

- Name: Eric Dennis McGregor
- Claim Number: 3889
- Claim Amount: \$30,000.00
- Date Filed: September 13, 2024
- Address: 247 Kentucky Dr., Lower Burrell, PA 15068
- Email: Edmac969@yahoo.com
- Phone: 724-681-4204

2. Background and Grounds for Response:

The claim I submitted relates to losses and damages arising from my purchase of a Fisker Ocean electric vehicle prior to Fisker's Chapter 11 filing. My claim was filed two days after the General Bar Date of September 11, 2024. I respectfully request that the Court allow my claim notwithstanding its lateness based on excusable neglect under Bankruptcy Rule 9006(b)(1).

3. Basis for Excusable Neglect:

- The delay was minimal—just two days—and I
- material impact on the bankruptcy estate or other
- I am a retail customer, not a commercial entity or



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professional creditor. I was not represented by legal counsel
and did not fully understand the deadlines or filing
requirements.

- The delay was unintentional and in good faith, and I acted promptly once I became aware of the need to file a claim.
- Disallowing my claim would result in an unjust financial loss to a consumer who relied on Fisker's representations and has suffered damages through no fault of his own.

4. Supporting Documentation:

Attached are:

- A copy of Proof of Claim #3889 filed on September 13, 2024
- A copy of the purchase agreement or invoice for my Fisker Ocean vehicle
- Any available correspondence between myself and Fisker Customer Service or support channels documenting the issue and timing

5. Request for Relief:

I respectfully request that the Court:

1. Overrule the Objection with respect to my claim (No. 3889);
2. Allow and preserve my \$30,000 claim for purposes of distribution under the Plan;
3. Grant such other and further relief as the Court deems appropriate and just.

6. Reservation of Rights:

I reserve all rights to amend or supplement this Response and to present additional evidence at any hearing on this matter.

Dated: August 2, 2025
Respectfully submitted,

[Signature]

Eric Dennis McGregor

247 Kentucky Dr.
Lower Burrell, PA 15068
Edmac969@yahoo.com
724-681-4204

FISKER **Purchase Order**

Seller's name: Fisker Group Inc
 Address: 1888 Rosecrans Ave
 City: Manhattan Beach

State: CA

Email:
 FiskerVehicleAdmin@fiskerinc.com
 Zip: 90266

Purchaser's Name: ERIC MCGREGOR
 Address: 247 Kentucky Drive
 City/State: Lower Burrell, PA

Telephone*: 7246814204
 Email: EDMAC969@YAHOO.COM
 Zip: 15068

Co-Purchaser's Name:
 Address:
 City/State:

Telephone*:
 Email:
 Zip:

VEHICLE BEING SOLD

Stock No: Year: 2023 Make: Fisker Model: Ocean Trim: Extreme Vin: VCF1EBU26PG008862

Ref #: 00001
 Odometer: 6

OPTIONS

Black Abyss Plus (FeelTek)
 Stealth Green
 22" F5b AirGlider - Black
 Recycled Floor Mats
 Tow Package - US
 Expanding Cargo Organizer
 Retractable Cargo Area Cover

VEHICLE PRICE

\$61,499.00

A processing fee is not an official fee. A processing fee is not required by law, but may be charged to buyers for handling documents and performing services related to the closing of a sale. A processing fee may not exceed \$299 for a motor vehicle contract or a reasonable amount agreed to by the parties for a heavy commercial vehicle contract. This notice is required by law.

\$0.00

\$4,500.00

\$1,600.00

\$250.00

\$1,200.00

\$0.00

\$199.00

Your signature acknowledges Fisker's current Odometer Disclosure on the complying Title.

\$69,248.00

\$69,248.00

Title and Registration fee estimates may change upon actual date of transfer.

Total cash price

Unpaid Balance

State sales tax

Title and Registration fee

Destination & Handling fee

Delivery fee

Processing fee

Sub-total

Reservation and Order fees paid

\$77,257.16

\$1,000.00

TRADE-IN INFORMATION (if applicable)

Year: Make: Stock No:
 VIN: Model:
 License Plate: Mileage:
 Lienholder:
 Address:
 Telephone*:
 Lien/Payoff amount: Payoff amount good until:

Purchaser represents and warrants with regard to any trade-in:

As the seller, you hereby sell, transfer, and convey all rights, title, and interest in and to the vehicle to Fisker, and future assignors designated by Fisker. In consideration of the sale of the vehicle to Fisker the seller enters into an agreement for the amount displayed, which represents the full Value of the Vehicle.

initial

You hereby represent and warrant to us that you are the sole legal and record owner of the Vehicle, and that no other party has any interest in or to the Vehicle unless disclosed as Lienholder above. You agree that you are responsible for any negative equity in connection with vehicle payoff. Funds may be utilized from financing with the new Fisker to cover any negative equity. Seller represents and warrants that the odometer of the Vehicle reflects the actual mileage, unless noted below.

initial

Amount of Mileage in excess of Mechanical limits

initial

IS NOT actual mileage or there is an odometer discrepancy

initial

Total due

\$76,257.16

Your signature acknowledges and agrees that the Fisker Ocean Preorder Agreement Terms and Conditions Addendum and all documents referenced therein are incorporated into this Purchase Order and complete the terms of sale.

Eric McGregor
 PURCHASER Eric McGregor (Jan 8, 2024 13:50 EST)
 SELLER Dan Allen

CO PURCHASER _____
 TITLE Sr VP, Global Marketing, Sales & Service

Date 01/08/2024

Date _____

*Fisker FinanceSM customers: you will receive a text at this number to facilitate signing your loan documents. Message and data rates may apply.