IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

		Hearing Date: May 29, 2025 at 10:00 a.m. (ET) Objection Deadline: May 14, 2025 at 4:00 p.m. (ET)
	Debtors.	(Jointly Administered)
FISKER, INC., et al., ¹		Case No. 24-11390 (TMH)
In re:		Chapter 11

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 CLAIMS; AND (II) MISCLASSIFIED CLAIMS

TO THE HOLDERS OF CLAIMS ON SCHEDULE 1 AND SCHEDULE 2 TO THE PROPOSED ORDER ANNEXED HERETO AS EXHIBIT A:

- YOUR SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND BY ANY FURTHER OBJECTION THAT MAY BE FILED BY THE LIQUIDATING TRUSTEE
- YOU ARE DIRECTED TO LOCATE YOUR CLAIM ON SCHEDULE 1 OR SCHEDULE 2 ATTACHED TO THE PROPOSED ORDER
- THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE LIQUIDATING TRUSTEE'S RIGHTS, OR THE RIGHTS OF OTHER PARTIES-**PURSUE FURTHER** IN-INTEREST, TO **SUBSTANTIVE** OR SUBSTANTIVE OBJECTIONS AGAINST THE CLAIMS ADDRESSED HEREIN

Matthew Dundon, solely in his capacity as the Liquidating Trustee (the "Liquidating <u>Trustee</u>") of the Fisker Liquidating Trust (the "<u>Liquidating Trust</u>"), hereby submits this seventh omnibus objection (substantive) (the "Objection") seeking entry of an order (the "Proposed Order"), substantially in the form annexed hereto as Exhibit A, pursuant to section 502 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007 of the Federal Rules of

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.



Bankruptcy Procedure (the "Bankruptcy Rules"), and Rule 3007-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"): (i) disallowing in full and expunging the claims listed on Schedule 1 to the Proposed Order for which the Debtors' estates have no liability (the "No Liability Claims"), according to the Books and Records (defined below); and (ii) reclassifying the priority status of the disputed claims listed on Schedule 2 to the Proposed Order because the Books and Records show that such Claims are not entitled to the asserted priority (the "Misclassified Claims" and, together with the No Liability Claims, the "Disputed Claims"). In support of the Objection, the Liquidating Trustee submits the Declaration of Rick Wright (the "Wright Declaration," a copy of which is attached hereto as Exhibit B and incorporated by reference herein), and respectively represents as follows:

JURISDICTION AND VENUE

- 1. The United States District Court for the District of Delaware has jurisdiction over this Objection pursuant to 28 U.S.C. § 1334, which was referred to the United States Bankruptcy Court for the District of Delaware (the "Court") under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012.
- 2. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2), and the Court may enter a final order consistent with Article III of the United States Constitution.²
- 3. The statutory bases for the relief requested herein are Bankruptcy Code section 502, Bankruptcy Rule 3007, and Local Rule 3007-1.

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Pursuant to Local Rule 9013-1(f), the Liquidating Trustee hereby confirms his consent to entry of a final order by the Court in connection with this Objection if it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

BACKGROUND

A. The Chapter 11 Cases

- 4. On June 17 and 19, 2024, as applicable (the "<u>Petition Date</u>"), Fisker, Inc. and its debtor affiliates (collectively, the "<u>Debtors</u>") commenced the above-captioned cases (the "<u>Chapter 11 Cases</u>") in the Court under chapter 11 of the Bankruptcy Code.
- 5. On October 15, 2024, the Debtors filed their fourth amended *Combined Disclosure*Statement and Chapter 11 Plan of Liquidation of Fisker Inc. and its Debtor Affiliates (as amended, the "Plan")³ [D.I. 713].
- 6. On October 16, 2024, the Court entered the Findings of Fact, Conclusions of Law, and Order, Approving the Disclosure Statement on a Final Basis, Confirming the Debtors' Joint Chapter 11 Plan of Liquidation, and Granting Related Relief (the "Confirmation Order")

 [D.I. 722] confirming the Plan.
- 7. Pursuant to the Confirmation Order, the appointment of the Liquidating Trustee was approved in all respects, including:

[T]o (a) carry out all rights and duties set forth in the Plan and Liquidating Trust Agreement, (b) appear and be heard on all matters related to the Chapter 11 Cases (as a representative of the Liquidating Trust and/or the Debtors, as applicable), (c) as set forth in Article VIII.B.3 of the Plan and this Order, investigate, prosecute and resolve, in the name of the Debtors and/or the name of the Liquidating Trustee, any Preserved Estate Claims (including, for the avoidance of doubt, any criminal causes of action), and (d) present to creditors and other courts of competent jurisdiction this Order as evidence of such authority.

See Confirmation Order, ¶ 73.

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Any capitalized term used but not otherwise defined herein shall have the meaning ascribed to it in the Plan (as defined below).

- 8. On October 17, 2024 (the "<u>Effective Date</u>"), the Plan went effective as set forth in the Notice of (I) Effective Date of Combined Disclosure Statement and Chapter 11 Plan of Liquidation of Fisker Inc. and its Debtor Affiliates and (II) Certain Claims Bar Dates [D.I. 730].
- 9. The Liquidating Trust was established on the Effective Date, into which the Debtors transferred "all of the Debtors' and Estates' rights, title, and interest in and to all of the Liquidating Trust Assets, and, in accordance with section 1141 of the Bankruptcy Code, the Liquidating Trust Assets, ... automatically vest[ed] in the Liquidating Trust free and clear of all Claims, Liens, encumbrances, or interests." *See* Confirmation Order, ¶ 75.
- 10. The Plan provides that, after the Effective Date, the Liquidating Trustee: "[s]hall have the sole authority to (a) file, withdraw or litigate to judgment, objections to Claims; (b) settle or compromise any Disputed Claim without any further notice to or action, order or approval by the Bankruptcy Court (other than a Professional Fee Claim)." *See* Plan, Article X.B.

B. The Bar Dates

- 11. On August 15 and 16, 2024, each Debtor filed its respective schedule of assets and liabilities (the "Schedules") and statement of financial affairs, as each may have been amended from time to time [D.I. 430-450].
- 12. On August 19, 2024, the Court entered its *Order (I) Establishing Certain Bar Dates* for Filing Proofs of Claim Against the Debtors, and (II) Granting Related Relief, Including Notice and Filing Procedures [D.I. 458] (the "Bar Date Order").
- 13. Among other things, the Bar Date Order established (i) 5:00 p.m. prevailing Eastern Time on September 11, 2024 (the "General Bar Date") as the deadline for all entities, other than governmental units, to file Proofs of Claim and (ii) 5:00 p.m. prevailing Eastern Time on

December 16, 2024 (the "<u>Government Bar Date</u>") as the deadline for governmental units to file Proofs of Claim.

14. The Plan and the Confirmation Order provided that holders of Administrative Claims and Claims arising from the rejection of executory contracts or unexpired leases pursuant to the Plan were required to file such claims no later than the first Business Day that was thirty (30) days following the Effective Date, or November 18, 2024 (the "Administrative Claims and Rejection Bar Date" and, together with the General Bar Date and the Government Bar Date, the "Bar Dates").

C. Deadlines to Object to Claims

- 15. Pursuant to the *Order Extending the Period to File and Serve Objections to Administrative Claims Through and Including April 18, 2025* [D.I. 817], the deadline for the Liquidating Trustee to object to Administrative Claims, including claims under Bankruptcy Code section 503(b)(9), is April 18, 2025 (the "<u>Administrative Claims Objection Deadline</u>"), subject to the Liquidating Trustee's right to seek additional extensions.
- 16. On April 10, 2025, the Liquidating Trustee filed the *Motion for Entry of an Order Further Extending the Time Period to File and Serve Objections to Administrative Claims* [D.I. 950], seeking to further extend the Administrative Claims Objection Deadline for 122 days, from April 18, 2025, through and including August 18, 2025, without prejudice to the Liquidating Trustee's right to seek further extensions thereof (the "Second Administrative Claims Objection Deadline Extension Motion").
- 17. A hearing on the Second Administrative Claims Objection Deadline Extension Motion is scheduled for May 29, 2025 at 10:00 a.m. ET in Wilmington, Del. Pursuant to Local Rule 9006-2, the filing of Second Administrative Claims Objection Deadline Extension Motion

prior to the expiration of the Administrative Claims Objection Deadline automatically extended the Administrative Claims Objection Deadline until the Court rules on the Second Administrative Claims Objection Deadline Extension Motion.

18. Pursuant to the *Order Extending the Period to File and Serve Objections to Claims and Interests Through and Including July 14*, 2025 [D.I. 883], the deadline for the Liquidating Trustee to object to Claims other than Administrative Claims is July 14, 2025, subject to the Liquidating Trustee's right to seek additional extensions.

D. The Claims Resolution Process

- 19. In the ordinary course of business, the Debtors maintained books and records (the "Books and Records") that reflect, among other things, the Debtors' liabilities and the amounts owed to their creditors. The Liquidating Trustee and his advisors (the "Reviewing Parties") have been and continue to conduct an exhaustive review of the Proofs of Claim filed in these Chapter 11 Cases, including any supporting documentation and a comparison of these documents with the Books and Records, to determine the validity of the Proofs of Claim. This process includes identifying categories of claims that may be targeted for disallowance and expungement, reduction and/or reclassification.
- 20. Additionally, pursuant to the *Order Granting Liquidating Trustee's Motion for*(I) Leave from Local Rule 3007-1(f) Related to the Filings of Substantive Omnibus Claim Objections and (II) Related Relief [D.I. 894], the Court approved certain omnibus claim objection procedures (the "Claims Objection Procedures"). The Claims Objection Procedures permit the Liquidating Trustee to conduct the Claims reconciliation process in a more timely, efficient, and cost-effective manner as it relates to the filing of substantive omnibus Claim objections.

- 21. While the Reviewing Parties' analysis and Claims reconciliation remains ongoing, the Liquidating Trustee has determined that the No Liability Claims are objectionable on substantive grounds and should be disallowed in full and expunged because the Books and Records show that the Debtors' estates have no liability on account of such Claims (*See*, column titled "Reason for Disallowance" on <u>Schedule 1</u>).
- 22. Additionally, the Liquidating Trustee has determined that the Misclassified Claims are objectionable on substantive grounds and should be reclassified to the appropriate unsecured status because the Books and Records show that such Claims are not entitled to the priority asserted in the applicable Proof of Claim (*See*, column titled "Asserted Claim Priority" on **Schedule 2**). The Liquidating Trustee is not seeking to allow or disallow and/or reduce the Disputed Claims listed in the "Reclassified Claim Priority" column on **Schedule 2**. However, the Liquidating Trustee expressly reserves the right to seek such relief in the future.⁴
- 23. To reduce the number of Claims, and to avoid possible double recovery or otherwise improper recovery by claimants, the Liquidating Trustee has filed several omnibus objections to Claims, with additional omnibus objections anticipated.

RELIEF REQUESTED

24. By this Objection and for the reasons described more fully herein, the Liquidating Trustee objects to the Disputed Claims set forth on **Schedule 1** and **Schedule 2** to the Proposed Order. The Liquidating Trustee respectfully requests entry of the Proposed Order disallowing, expunging and/or reclassifying the Disputed Claims, as applicable.

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This Objection is expressly without prejudice to any and all rights of the Liquidating Trustee to bring future and/or additional objections to any of the Disputed Claims on any basis.

BASIS FOR RELIEF

- 25. Section 502(a) of the Bankruptcy Code provides, in pertinent part, as follows: "[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest . . . objects." *See* 11 U.S.C. § 502(a). Further, section 502(b)(1) of the Bankruptcy Code provides that a court "shall determine the amount of such claim . . . as of the date of the filing of the petition, and shall allow such claim in such amount, except to the extent that—such claim is unenforceable against the debtor and the property of the debtor" *See id.* § 502(b)(1).
- 26. The burden of proof for determining the validity of claims rests on different parties at different stages of the objection process. As explained by United States Court of Appeals for the Third Circuit:

The burden of proof for claims brought in bankruptcy court under 11 U.S.C. § 502(a) rests on different parties at different times. Initially, the claimant must allege facts sufficient to support the claim. If the averments in his filed claim meet this standard of sufficiency, it is 'prima facie' valid. [citations omitted]. In other words, a claim that alleges facts sufficient to support legal liability to the claimant satisfies the claimants' initial obligation to go forward. The burden of going forward then shifts to the objector to produce evidence sufficient to negate the prima facie validity of the filed claim . . . In practice, the objector must produce evidence which, if believed, would refute at least one of the allegations that is essential to the claim's legal sufficiency. If the objector produces sufficient evidence to negate one or more of the sworn facts in the proof of claim, the burden reverts to the claimant to prove the validity of the claim by a preponderance of the evidence.

In re Allegheny Int'l Inc., 954 F.2d 167, 173-74 (3d Cir. 1992) (citation omitted). Once the prima facie validity of a claim is rebutted, "it is for the claimant to prove his claim, not for the objector to disprove it." *In re Kahn*, 114 B.R. 40, 44 (Bankr. S.D.N.Y. 1990) (citations omitted).

- 27. Bankruptcy Rule 3007 provides certain grounds upon which "objections to more than one claim may be joined in a single objection." *See* Fed. R. Bankr. P. 3007(d). Additionally, Local Rule 3007-1 governs omnibus objections to Claims in this District and "applies to an omnibus objection to claims. . . . [(i.e.,] an objection that objects to claims filed by different claimants." *See* Del. Bankr. L.R. 3007-1(a).
- 28. Pursuant to Local Rule 3007-1(c) and the Claims Objection Procedures, the Liquidating Trustee may file omnibus objections on a substantive basis to Claims to which the Books and Records show that the Debtors' estates have no liability, as well as Claims that are incorrectly or improperly classified.
- 29. For the reasons set forth herein, there is ample evidence to rebut the *prima facie* validity of each of the Disputed Claims.

A. <u>No Liability Claims</u>

- 30. Bankruptcy Code section 502(b)(1) provides that a claim asserted in a proof of claim shall be allowed, except to the extent "such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law." 11 U.S.C. § 502(b)(1).
- 31. The Liquidating Trustee has identified certain Disputed Claims listed on Schedule 1 to the Proposed Order that he is unable to reconcile with the Books and Records. The Liquidating Trustee believes that the No Liability Claims are not valid claims because of one or more of the following: (i) the Books and Records do not reflect the existence of the asserted Claim or of the claimant asserting such Claim, or otherwise indicate a scheduled liability of zero and/or disputed liability with respect to such Claim; (ii) the Claims provide either no documentation or insufficient supporting documentation to provide prima facie evidence of the validity and amount of the Claim; (iii) the Claims are not enforceable against the Debtors or their property under any agreement or

applicable law; or (iv) the claimant waived, released, or is estopped from asserting the Claim against any of the Debtors' estates.

- 32. Based on the Reviewing Parties' review and analysis of the Books and Records, the Claims Register, the Wright Declaration and the Proofs of Claim and supporting documentation, the No Liability Claims are not enforceable under any applicable law or agreement within the meaning of Bankruptcy Code section 502(b)(1) and, therefore, the Debtors' estates are not liable for such Claims.
- 33. Accordingly, the Liquidating Trustee (i) objects to the No Liability Claims and (ii) requests entry of the Proposed Order disallowing in full and expunging each of the No Liability Claims.

B. <u>Misclassified Claims</u>

- 34. The Misclassified Claims are unenforceable against the Debtors' estates in the priority asserted for the reasons set forth herein and in the Wright Declaration.
- 35. Each Misclassified Claim was filed against a Debtor for certain amounts allegedly owed by that Debtor. The Misclassified Claims must be reclassified because a review of the Books and Records, as well as the documentation (or lack thereof) submitted in support of the Misclassified Claims, establish that the Misclassified Claims were asserted with the incorrect priority status.
- 36. If the Misclassified Claims are not reclassified, the potential exists for the applicable claimants to receive recoveries to which they are not entitled, to the detriment of the Debtors' other stakeholders.

37. Accordingly, the Liquidating Trustee (i) objects to the Misclassified Claims and (ii) requests entry of the Proposed Order reclassifying each of the Misclassified Claims to the correct priority.

RESPONSES TO OMNIBUS OBJECTIONS

- 38. To contest this Objection, a claimant must file and serve a written response (a "Response") so that it is received no later than May 14, 2025 at 4:00 p.m. (Eastern Time) (the "Response Deadline"). Every Response must be filed with the Office of the Clerk of the United States Bankruptcy Court for the District of Delaware: 824 North Market Street, Wilmington, Delaware 19801, and served upon the following entities, so that the Response is received no later than the Response Deadline, at the undersigned addresses for counsel to the Liquidating Trustee.
- 39. Every Response to this Objection must contain, at a minimum, the following information:
 - i. a caption setting forth the name of the Court, the name of the Debtors, the case number, and the title of the objection to which the response is directed;
 - ii. the name of the claimant, his/her/its Claim number, and a description of the basis of the claim;
 - iii. the specific factual basis and supporting legal argument upon which the party will rely in opposing this Objection;
 - iv. any supporting documentation, to the extent it was not included with the Proof of Claim, previously filed with the clerk or claims agent, upon which the party will rely to support the basis for and amounts asserted in the Proof of Claim; and
 - v. the name, address, telephone number, email address and fax number of the persons (which may be the claimant or the claimant's legal representative) with whom counsel for the Liquidating Trustee should communicate with respect to the Claim and/or the Objection and who possesses authority to reconcile, settle, or otherwise resolve the Objection to the Disputed Claim on behalf of the claimant.
- 40. If a claimant fails to file and serve a timely Response by the Response Deadline, the Liquidating Trustee will present to the Court an appropriate order disallowing in full and

expunging and/or reclassifying such claimant's Claim, as applicable, as set forth on **Schedule 1** and **Schedule 2** to the Proposed Order without further notice to the claimant.

REPLIES TO RESPONSES

41. Consistent with Local Rule 9006-1(d), the Liquidating Trustee may, at his option, file and serve a reply to a Response no later than 4:00 p.m. (Prevailing Eastern Time) one (1) day prior to the deadline for filing the agenda for any hearing to consider the Objection.

SEPARATE CONTESTED MATTERS

42. Each of the above objections to the Proofs of Claim constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. The Liquidating Trustee requests that any order entered by this Court with respect to an objection asserted in this Objection shall be deemed a separate order with respect to each Claim.

RESERVATION OF RIGHTS

43. The Liquidating Trustee expressly reserves the right to amend, modify or supplement this Objection and to file additional objections to the Proofs of Claim or any other Claims (filed or not) which may be asserted against the Debtors and/or the Liquidating Trust. Should one or more of the grounds of objection stated in this Objection be dismissed, the Liquidating Trustee reserve his rights to object on other stated grounds or on any other grounds that the Liquidating Trustee discovers during the pendency of these Chapter 11 Cases.

NOTICE

44. Notice of this Objection has been provided via first class mail and e-mail (if available) to (i) the Office of the United States Trustee for the District of Delaware; (ii) all of the claimants on **Schedule 1** and **Schedule 2** to the Proposed Order; and (iii) any persons who have filed a request for notice in these Chapter 11 Cases pursuant to Bankruptcy Rule 2002.

STATEMENT OF COMPLIANCE WITH LOCAL RULE 3007-1

45. The undersigned representative of Cole Schotz P.C. ("Cole Schotz") certifies that the firm has reviewed the requirements of Local Rule 3007-1 and that the Objection substantially complies with that Local Rule. To the extent that the Objection does not comply in all respects with the requirements of Local Rule 3007-1, Cole Schotz asserts that such deviations are not material and respectfully requests that any such requirement be waived.

CONCLUSION

46. Accordingly, the Liquidating Trustee respectfully requests that this Court: (i) enter the Proposed Order attached hereto as **Exhibit A** disallowing in full and expunging and/or reclassifying, as applicable, the Disputed Claims; and (ii) grant such other and further relief as is just and proper.

Dated: April 23, 2025 Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Justin R. Alberto

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Co-Counsel to the Liquidating Trustee

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

		Hearing Date: May 29, 2025 at 10:00 a.m. (ET) Objection Deadline: May 14, 2025 at 4:00 p.m. (ET)
	Debtors.	(Jointly Administered)
FISKER, INC., et al.,1		Case No. 24-11390 (TMH)
In re:		Chapter 11

NOTICE 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 CLAIMS; AND (II) MISCLASSIFIED CLAIMS

TO THE HOLDERS OF CLAIMS ON <u>SCHEDULE 1</u> AND <u>SCHEDULE 2</u> TO THE PROPOSED ORDER ANNEXED TO THE OBJECTION AS <u>EXHIBIT A</u>:

- YOUR SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND BY ANY FURTHER OBJECTION THAT MAY BE FILED BY THE LIQUIDATING TRUSTEE
- YOU ARE DIRECTED TO LOCATE YOUR CLAIM ON <u>SCHEDULE 1</u> OR <u>SCHEDULE 2</u> ATTACHED TO THE PROPOSED ORDER
- THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE LIQUIDATING TRUSTEE'S RIGHTS, OR THE RIGHTS OF OTHER PARTIES-IN-INTEREST, TO PURSUE FURTHER SUBSTANTIVE OR NON-SUBSTANTIVE OBJECTIONS AGAINST THE CLAIMS ADDRESSED HEREIN

PLEASE TAKE NOTICE, that on April 23, 2025, Matthew Dundon, solely in his capacity as the Liquidating Trustee (the "<u>Liquidating Trustee</u>") of the Fisker Liquidating Trust, filed 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 Claims; and (II) Misclassified Claims (the "<u>Objection</u>") with the United States Bankruptcy Court for the District of Delaware (the "<u>Court</u>"). A copy of the Objection is enclosed herein.

PLEASE TAKE FURTHER NOTICE, that responses, if any, to the Objection must be filed with the Clerk of the Court, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **May 14, 2025 at 4:00 p.m. (ET)** (the "**Response Deadline**"). At the same time, you

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.

must serve a copy of the response upon the undersigned counsel so as to be received on or before the Response Deadline.

PLEASE TAKE FURTHER NOTICE, that, if a response is timely filed and served, and such objection or response is not otherwise timely resolved, a hearing with respect to the Objection will be held before The Honorable Thomas M. Horan, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 5th Floor, Courtroom #5, Wilmington, Delaware 19801 on **May 29, 2025 at 10:00 a.m.** (**ET**).

PLEASE TAKE FURTHER NOTICE THAT IF NO RESPONSE IS RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY ENTER THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

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Dated: April 23, 2025 Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Justin R. Alberto

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Co-Counsel to the Liquidating Trustee

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

		Re: D.I
	Debtors.	(Jointly Administered)
FISKER, INC., et al.,1		Case No. 24-11390 (TMH)
In re:		Chapter 11

ORDER GRANTING 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 CLAIMS; AND (II) MISCLASSIFIED CLAIMS

THIS MATTER having come before the Court² upon 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 Claims; and (II) Misclassified Claims (the "Objection"), 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 disallowing in full and expunging and/or reclassifying the priority status, as applicable, of the Disputed Claims listed on Schedule 1 and Schedule 2 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

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.

Any capitalized term used but not otherwise defined herein shall have the meaning ascribed to it in the Objection.

given; and it appearing that no other notice need be given; and the Court having considered the Objection, the Disputed Claims listed on <u>Schedule 1</u> and <u>Schedule 2</u> 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 <u>Schedule 1</u> and <u>Schedule 2</u> attached hereto was properly and timely served with a copy of the Objection, the Wright Declaration, this Order, the accompanying schedules, 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. The relief requested in the Objection is in the best interests of the Debtors' creditors, the Debtors' estates, the Liquidating Trust and other parties-in-interest; and it is therefore:

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 No Liability Claims on <u>Schedule 1</u> hereto is hereby disallowed and expunged in its entirety.
- 4. Each of the Misclassified Claims on <u>Schedule 2</u> hereto is hereby reclassified to the classification status set forth thereon.
- 5. The Liquidating Trustee's rights to further object at a later date and on any basis to Disputed Claims on **Schedule 1** and **Schedule 2** hereto are fully preserved.

- 6. The official claims register in these Chapter 11 Cases shall be modified in accordance with this Order.
- 7. 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.
- 8. 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).
- 9. 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.

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Schedule 1 No Liability Claims

#	Name	Claim No.	Asserted Claim Amount	Asserted Claim Priority	Adjusted Amount	Objection Type	Basis for objection
1	Abdelaziz, Haney	3422	Total Claim: \$123490.78 Secured: \$69,522.86			No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
2	Abrol, Deepankar	1584	Total Claim: \$189,000.00 Secured: \$25,000.00 Priority: \$15,150.00			No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
3	Acroot Packaging, Inc.	3487	Total Claim: \$107,803.82 Secured: \$54,200.40	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
4	Ahmad, Raheem	1141	Total Claim: \$78,082.74 Priority: \$5,000.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
5	Ahmadi, Arman	3901	Total Claim: \$40,000.00 Secured: \$40,000.00 Priority: \$40,000.00	Secured/Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim. The Claim is purportedly based upon common stock ownership and/or loss of value of such common stock; on the Effective Date, all Equity Interests in the Debtors were deemed automatically canceled, released, and extinguished and claimant is not entitled to any distributions on account thereof.
6	Akhavan, Parham	3209	\$40,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
7	Ambrosio, Mark	178	\$30,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
8	Andersen, Sylvia	2689	Total Claim: \$72,860.00 Priority: \$3,350.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
9	Antono, Robbin	90	Total Claim: \$61,400.00 Secured: \$39,056.63	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
10	Arturi, Andrew B.	1208	Total Claim: \$44,150.00 Secured: \$40,478.74	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
11	Azadpour, Maziar	3084	Total Claim: \$72,000.00 Priority: \$3,350.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
12	Barnes, Michelle	2929	Total Claim: \$71,437.00 Secured: \$26,272.22	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
13	Baur, Josef	2065	Total Claim: \$630.00 Secured: \$630.00 Priority \$630.00	Secured/Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim. The Claim is purportedly based upon common stock ownership and/or loss of value of such common stock; on the Effective Date, all Equity Interests in the Debtors were deemed automatically canceled, released, and extinguished and claimant is not entitled to any distributions on account thereof.
14	Baur, Josef	2084	Total Claim: \$630.00 Secured: \$630.00 Priority \$630.00	Secured/Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim. The Claim is purportedly based upon common stock ownership and/or loss of value of such common stock; on the Effective Date, all Equity Interests in the Debtors were deemed automatically canceled, released, and extinguished and claimant is not entitled to any distributions on account thereof.
15	Bendit, Richard	2146	Total Claim: \$71,307.66 Priority: \$3,600.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
16	Bernstein, Evan	1410	Total Claim: \$68,999.00 Priority: \$3,350.00		\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
17	Birch, Shane	2618	Total Claim: \$75,990.88 Secured: \$56,360.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.

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18	Bjornson, Adam	1048	Total Claim: \$82,580.00 Secured: \$25,722.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
19	Brigman, David	1086	Total Claim: \$50,000.00 Priority: \$3,350.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
20	Brown, Doug	1271	Total Claim: \$40,000.00 Secured: \$20,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
21	Brunt, Amy	1531	Total Claim: \$74,507.69 Secured: \$59,507.69	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
22	Buege, Brian	2421	Total Claim: \$70,000.00 Priority: \$3,350.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
23	Cannata, Kim	2569	Total Claim: \$76,425.22 Secured: \$36,273.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
24	Cappel, Mary	2860	Total Claim: \$77,748.00 Priority: \$3,350.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
25	Choudhury, Shah	3909	Total Claim: \$7,910.00 Secured: \$7,910.00 Priority: \$7,910.00	Secured/Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim. The Claim is purportedly based upon common stock ownership and/or loss of value of such common stock; on the Effective Date, all Equity Interests in the Debtors were deemed automatically canceled, released, and extinguished and claimant is not entitled to any distributions on account thereof.
26	Cochran, Suzanne	24	\$30,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
27	Conlon, Nicole	2516	Total Claim: \$78,754.40 Priority: \$26,000.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
28	Crespo, Fausto	3003	Total Claim: \$85,138.32 Secured: \$80,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
29	Crespo, Fausto	3130	Total Claim: \$85,138.32 Secured: \$80,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
30	Dawson, Dennis	299	Total Claim: \$68,999.00 Secured: \$44,000.00 Priority: \$44,000.00	Secured/Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
31	Decker, Michael	2866	\$69,750.00	Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
32	Dedomo, Dario	2259	Total Claim: \$40,000.00 Secured: \$40,000.00 Priority: \$40,000.00	Secured/Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
33	Desai, Chirag	2285	Total Claim: \$70,000.00 Secured: \$68,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
34	Desai, Virag	480	\$62,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
35	Diaz, Hugo	1855	Total Claim: \$63,000.00 Priority: \$3,350.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
36	Diep, Say	1232	Total Claim: \$50,000.00 Secured: \$47,280.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
37	Digital Dreams Innovation, Inc.	136	Total Claim: \$30,000.00 Secured: \$30,000.00 Priority \$30,000.00	Secured/Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
38	Dilles, Robert	156	Total Claim: \$11,960.00 Priority: \$3,350.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.

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39	Dionisopoulos, Sandra	3087	Total Claim: \$71,124.33 Priority: \$3,350.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
40	Dominick, Douglas	103	Total Claim: \$81,000.00 Secured: \$10,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
41	Droneburg, Mark	2347	\$595.90	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim. The Claim is purportedly based upon common stock ownership and/or loss of value of such common stock; on the Effective Date, all Equity Interests in the Debtors were deemed automatically canceled, released, and extinguished and claimant is not entitled to any distributions on account thereof.
42	Dugenio, Jon	1493	Total Claim: \$60,000.00 Priority: \$51,000.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
43	Earhart, Jeff	2379	Total Claim: \$82,627.00 Secured: \$71,437.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
44	Evans, William	3619	Total Claim: \$53,000;.00 Secured: \$52,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
45	EWING, MONICA	1112	Total Claim: \$100,000.00 Secured: \$63,209.00 Priority: \$1,000.00	Secured/Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
46	Firer, Inna	1798	Total Claim: \$35,000.00 Secured: \$35,000.00 Priority: \$10,000.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
47	Flores, Henry	3242	\$70,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
48	Freeman, Lisa	1521	Total Claim: \$89,899.20 Secured: \$71,209.32	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
49	Gardner, William	3312	\$33,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
50	Garnes, Lamont Sr.	1435	Total Claim: \$52,694.99 Secured: \$37,047.00 Priority: \$3,350.00	Secured/priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
51	Gelli, Sreedhar	1296	\$70,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
52	Ghanavati, Habibollah	1677	Total Claim: \$30,000.00 Secured: \$20,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
53	Giarritta, John	2011	Total Claim: \$74,114.11 Secured: \$35,962.11	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
54	Goldberg, Erwin	1694	Total Claim: \$76,720.52 Secured: \$66,470.52	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
55	Goldwyn, David	1691	Total Claim: \$50,000.00 Secured: \$20,000.00 Priority \$15,000.00	Secured/Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
56	Gomes, Patricia	2137	Total Claim: \$76,746.00 Secured: \$74,148.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
57	Greenwald, David	1282	Total Claim: \$65,000.00 Priority: \$18,650.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
58	Grimberg, Arthur	2506	Total Claim: \$74,412.43 Secured: \$47,274.57	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
59	Gross, James	1312	Total Claim: \$79,998.22 Secured: \$54,748.22	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.

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60	Grzech, Greg	2348	Total Claim: \$177,000.00 Secured: \$177,000.00 Priority: \$15,000.00		\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
61	Gunda, Kiran	1568	\$61,323.47	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
62	Haider, Syed	2682	\$72,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
63	Hajari, Uday	1451	Total Claim: \$58,778.00 Secured: \$21,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
64	Halle, Ray	2132	Total Claim: \$70,768.31 Priority: \$11,000.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
65	Hannah, William	70	Total Claim: \$40,000.00 Priority: \$3,350.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
66	Heath, Shane	2864	Total Claim: \$75,717.71 Secured: \$23,361.14	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
67	Hect, Michael	2066	\$20,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
68	Hembree, Derek	1412	\$78,624.29	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
69	Hemenway, Marcus	3103	\$800.00	Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
70	Hippely, Matthew	306	Total Claim: \$80,616.00 Secured: \$68,999.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
71	Hoghooghi, Alexander	2152	\$77,512.80	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
72	Hovhannisyan, Hakob	3437	\$68,211.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
73	Itzaina, David	174	Total Claim: \$79,868.00 Priority: \$5,250.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
74	Jason, Ben	3409	\$65,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
75	JOHN, SAJI	455	\$76,815.52	Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
76	JOHN, SAJI	1845	\$76,815.52	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
77	Jr, Fritz	3395	\$70,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
78	Kaiserling, Crystal	3020	Total Claim: \$4,500.00 Secured: \$4,500.00 Priority: \$3,350.00	Secured/Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
79	Kaiserling, Juergen	3482	Total Claim: \$3,800.00 Secured: \$3,800.00 Priority: \$3,350.00	Secured/Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
80	Kar, Joseph	3542	Total Claim: \$100,000.00 Secured Claim: \$51,229.19	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
81	Kaur, Sandeep	309	Total Claim: \$78,625.71 Secured: \$78,625.71 Priority: \$5,000.00	Secured/Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.

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82	Khan, Noor	1579	Total Claim: \$79,000.00 Secured: \$79,000.00 Priority: \$55,200.00	Secured/Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
83	Kornegay, Dennis	3380	Total Claim: \$30,000.00 Secured: \$15,000.00 Priority: \$5,000.00 Administrative: \$30,000.00	Secured/Priority/Administrative	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured, priority, or administrative claim.
84	Kunishima, Marti	1091	\$78,111.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
	Kvale, Ronald	2335	\$689,990.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
86	Laird, Jeff	1525	Total Claim: \$66,771.48 Secured: \$10,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
87	Leon, Jennifer	1332	Total Claim: \$72,588.00 Secured: \$64,295.29	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
88	Leon, Jennifer	2216	Total Claim: \$88,283.52 Secured: \$72,588.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
89	Leon, Victor	1445	Total Claim: \$90,583.92 Secured: \$74,160.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
90	Levin, Peter	3477	\$40,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
91	Lopez, Gary	237	Total Claim: \$50,000.00 Secured: \$22,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
92	Lopez, Ramon	2205	Total Claim: \$72,000.00 Secured: \$60,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
93	Lowry, Brian	1096	Total Claim: \$23,400.00 Secured: \$800.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
94	Lund, Joshua	1588	Total Claim: \$74,565.00 Secured: \$15,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
95	McArdle, Michael	2374	Total Claim: \$77,795.94 Secured: \$48,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
96	McCartney, Randy	1520	Total Claim: \$76,718.96 Secured: \$20,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
97	McCorkle, Kimberly	2988	Total Claim: \$90,000.00 Secured: \$58,015.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
98	McInerney, Jennifer	1544	Total Claim: \$77,688.29 Secured: \$68,999.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
99	Mehta, Sanatkumar	3676	Total Claim: \$70,473.02 Secured: \$65,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
100	Metz, Luke	2794	\$49,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
101	Mills, Jeffrey	240	\$55,191.62	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
102	Miryala, Aravind	2440	Total Claim: \$76,985.55 Secured: \$61,763.91	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.

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103	Mistry, Himanshu	1865	Total Claim: \$70,000.00 Secured: \$70,000.00 Priority: \$5,250.00	Secured/Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
104	Mogasala, Murali	3262		Admin Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to an administrative priority claim.
105	Morillo, Jesus	2934	Total Claim: \$85,764.76 Secured: \$80,000.76	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
106	Moss, Jacob	1459	Total Claim: \$90,953.81 Priority: \$3,500.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
107	Moss, Jacob	1472	Total Claim: \$90,953.81 Priority: \$3,500.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
108	Moss, Jacob	1524	Total Claim: \$90,953.81 Priority: \$3,500.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
109	Moss, Jacob	1526	Total Claim: \$90,953.81 Priority: \$3,500.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
110	Muralidharan, Chakravarthi	640	\$39,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
111	Muthyala, Sunil	1093	\$73,840.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
112	NA, JP	2051	\$74,701.97	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
113	Najm, Rudy	1627	Total Claim: \$70,537.47 Priority: \$5,000.00 Administrative: \$5,000.00	Priority/Administrative/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority or administrative claim.
114	Nakani, Pinak	496	Total Claim: \$77,000.00 Priority: \$5,000.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
115	Nestor, Kouya	1133	Total Claim: \$72,000.00 Secured: \$28,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
116	NOYES, DAVID	1509	Total Claim: \$72,499.00 Secured: \$48,444.07 Priority: \$5,000.00	Secured/Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
117	Olson, Brady	2836	Total Claim: \$69,249.00 Secured: \$52,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
118	Ordonez, Rocio	21	\$76,765.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
119	Osterbur, Megan	502	Total Claim: \$44,740.14 Secured: \$41,728.99 Priority: \$3,350.00	Secured/Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
120	Osterbur, Megan	483	Total Claim: \$44,740.14 Secured: \$40,353.89 Priority: \$3,350.00	Secured/Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
121	Ostrinsky, Anatoly	2824		Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
122	Owens, Jason	474	Total Claim: \$53,886.00 Secured: \$53,886.00 Priority: \$3,350.00	Secured/Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
123	Pagidimarri, Aloki	1180	\$72,007.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
124	Palmer, Kendra	3031	Total Claim: \$92,321.21 Secured: \$87,071.21	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.

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125	Patel, Ashok	3018	Total Claim: \$60,000.00 Secured: \$14,086.11	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
126	Patel, Chetankumar	3276	Total Claim: \$60,000.00 Secured: \$60,000.00 Priority: \$60,000.00	Secured/Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
	Patel, Jayesh	2931	Total Claim: \$68,999.00 Secured: \$59,917.02 Priority: \$11,089.98			No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
	Patel, Kunal	1387	Total Claim: \$50,439.05 Secured: \$44,042.58			No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
	Patel, Rajesh	3174	\$30,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
130	Patterson, Rossi	1922	Total Claim: \$72,000.00 Secured: \$62,000.00 Priority: \$10,000.00	Secured/Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
131	Peniuk, Trevor	3491	\$70,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
132	Perkins, Jason	674	Total Claim: \$10,000.00 Priority: \$8,350.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
133	Perry, Steve	1489	Total Claim: \$80,964.60 Secured: \$74,964.60 Priority: \$3,350.00	Secured/Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
134	Peters, Rene	1638	\$4,291.38	Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim. The Claim is purportedly based upon common stock ownership and/or loss of value of such common stock; on the Effective Date, all Equity Interests in the Debtors were deemed automatically canceled, released, and extinguished and claimant is not entitled to any distributions on account thereof.
	Potturu, Aravind	1635	Total Claim: \$77,695.22 Secured: \$60,000.00 Priority: \$43,145.00	Secured/Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
136	Ramirez, David	1283	Total Claim: \$30,000.00 Secured: \$24,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
137	Ramos, Javin	1395	Total Claim: \$30,000.00 Priority: \$5,000.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
138	Rance, Sharon	3442	\$47,168.43	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
139	Reeves, Craig	1715	Total Claim: \$78,900.00 Secured: \$53,650.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
140	Reeves, Sarah	1712	Total Claim: \$78,900.00 Secured: \$53,650.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
141	Riaz, Betty	238	Total Claim: \$77,185.00 Secured: \$35,935.00 Priority: \$3,350.00	Secured/Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
142	Rodgers, Daniel	3299	Total Claim: \$80,691.00 Secured: \$40,263.43	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
143	Rosenzweig, James	3168	Total Claim: \$65,000.00 Secured: \$61,958.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
144	Rovner, Alec	2395	\$55,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
145	Roy, Raj	553	\$72,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.

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146	Ruiz, Arthur	125	\$74,114.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
147	Scharffenberger, John	3369	Total Claim: \$70,000.00 Secured: \$50,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
148	Schmidt-Lehmann, Thomas	2906	Total Claim: \$7,102.61 Priority: \$3,350.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim. The Claim is purportedly based upon common stock ownership and/or loss of value of such common stock; on the Effective Date, all Equity Interests in the Debtors were deemed automatically canceled, released, and extinguished and claimant is not entitled to any distributions on account thereof.
149	Scholl, Terry	1404	Total Claim: \$53,199.00 Secured: \$38,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
150	Scinto, Michael	2872	Total Claim: \$67,408.00 Secured: \$25,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
151	Seelam, Lakshmi	2399	Total Claim: \$75,000.00 Secured: \$50,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
152	Seiden, Robert	3310	\$10,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
153	Selvidge, Linda	510	\$1,000.00	Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
154	Senyondo, Godson	3108	\$79,300.06	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
155	Shah, Dr.	2415	Total Claim: \$77,143.00 Priority: \$5,000.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
156	Shelton, Timothy	1724	Total Claim: \$78,000.00 Secured: \$75,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
157	Sidhu, Raj	158	\$40,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
158	Singh, Sarnjeet	1165	Total Claim: \$78,208.55 Priority: \$10,036.55	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
159	Sittnick, Frank	2373	Total Claim: \$76,724.32 Secured: \$65,884.06	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
160	Smith, Idris	2722	Total Claim: \$89,380.20 Secured: \$67,680.06	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
161	Sokolowski, Brian	454	Total Claim: \$78,744.59 Secured: \$75,021.33	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
162	Sonboli, Maryam	1267	Total Claim: \$78,648.00 Priority: \$3,350.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
163	Sonboli, Maryam	1266	Total Claim: \$78,648.00 Priority: \$3,350.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
164	Spano, Thomas	1479	\$75,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
165	Stefan, Claudiu	1235	\$77,500.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
166	Stiglitz, Daniel	1409	\$59,228.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.

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167	Stovner, Eric	2321	Total Claim: \$5,250.00 Priority: \$3,350.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
168	Sundarraj, Malathi	1425	Total Claim: \$77,025.45; Secured: \$51,775.45	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
	Suram, Swathi	3480	Total Claim: \$80,000.00 Secured: \$70,000.00 Priority: \$10,000.00			No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
	Swanson, Jay	2712	Total Claim: \$30,000.00 Secured: \$26,000.00			No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
	Tagari, Pervez	3160	\$110,000.00		·	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
172	Taneja, Anupam	4019	\$18,037.50	Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim. The claim is purportedly based upon common stock ownership and/or loss of value of such common stock; on the Effective Date, all Equity Interests in the Debtors were deemed automatically canceled, released, and extinguished and claimant is not entitled to any distributions on account thereof.
173	Tassara, Lisa	2446	\$1,000.00		\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim. The claim is purportedly based upon common stock ownership and/or loss of value of such common stock; on the Effective Date, all Equity Interests in the Debtors were deemed automatically canceled, released, and extinguished and claimant is not entitled to any distributions on account thereof.
174	Taylor, James	3166	\$75,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
175	Tekumalla, Sudhir	1087	Total Claim: \$71,000.00 Secured: \$44,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
176	Thakore, Mehul	3488	\$5,000.00	Priority		No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
177	Thomas, Siby	1474	\$73,879.94	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
178	Torres, Eriberto	3323	Total Claim: \$40,076.68 Priority: \$15,000.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
179	Tran, Vince	34	\$100,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
180	Travalini, David	2890	Total Claim: \$74,100.00 Secured: \$40,100.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
181	Traverse, Danielle	2851	Total Claim: \$72,411.00 Secured: \$35,300.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
182	Trust, Larissa	3218	Total Claim: \$77,427.94 Secured: \$77,427.94 Priority: \$30,000.00	Secured/Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
	Tsang, Jeffrey	3349	Secured: \$10,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
184	Tucker, Reggie	2800	Total Claim: \$72,661.00 Secured: \$48,998.01	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.

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185	Twible, MaryAn	2413	\$2,686.93	Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim. The Claim is purportedly based upon common stock ownership and/or loss of value of such common stock; on the Effective Date, all Equity Interests in the Debtors were deemed automatically canceled, released, and extinguished and claimant is not entitled to any distributions on account thereof.
186	Twiner, Christopher	77	Total Claim: \$79,407.00 Secured: \$70,449.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
187	V, Selvam	1186	Total Claim: \$42,000.00 Priority: \$42,000.00	Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim. The Claim is purportedly based upon common stock ownership and/or loss of value of such common stock; on the Effective Date, all Equity Interests in the Debtors were deemed automatically canceled, released, and extinguished and claimant is not entitled to any distributions on account thereof.
188	Venneri, Alexandra	239	\$78,724.70	Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
189	Vermilye, James	1463	Total Claim: \$70,519.00 Secured: \$15,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
190	Vo, Hoang	269	Total Claim: \$50,000.00 Secured: \$40,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
191	Walker, Gregory	543	\$29,449.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
192	Walsh, Richard	2390	\$30,000.00	Secured	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
193	Wang, Kehyoung	1210	Total Claim: \$25,000.00 Secured: \$25,000.00 Priority: \$25,000.00	Secured/Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
194	Weinstock, Yitzchak	3079	Total Claim: \$79,558.13 Priority: \$3,350.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
195	Williams, Areejus	1807	Total Claim: \$78,562.99 Secured: \$73,562.99	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
196	Witulski, Jason	1699	Total Claim: \$74,194.70 Secured: \$59,200.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.
197	Wojciechowski, Amy	1749	Total Claim: \$78,435.02 Secured: \$73,185.02 Priority: \$3,350.00	Secured/Priority	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured or priority claim.
198	Yang, Chheang	1836	Total Claim: \$50,114.00 Priority: \$2,500.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
199	Zim, Craig	430	Total Claim: \$75,000.00 Priority: \$3,536.00	Priority/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a priority claim.
200	Zipeto, Mark	2085	Total Claim: \$45,000.00 Secured: \$38,000.00	Secured/GUC	\$0.00	No Liability	The Debtors' Books and Records reflect that there are no amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid claim. Further, there is no evidence that this claimant is entitled to a secured claim.

Schedule 2 Misclassified Claims

# Name	Claim No.	Asserted Claim Amount Asserted Claim Priority	Reclassified Clain Amount	n Reclassified Claim Priority	Basis for objection
1 American Auto Transportation, Ltd.		Total Claim: \$20,250.00 Priority: Priority/GUC \$7,725.00		General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(4) 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)(4).
2 American Auto Transportation, Ltd.	1917	Total Claim: \$950.00 Priority: Priority/GUC \$300.00	\$950.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(4) 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)(4).
3 Anthony, Mark	447	\$26,986.72 Secured	\$26,986.72	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 Attack Research LLC	3977	Total Claim: \$55,710.00 Priority Priority/GUC \$15,150.00	\$55,710.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(4) 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)(4).
5 Barone, Giovanni	1274	Total Claim: \$95,935.00 Secured: Secured/GUC \$46,198.40	\$95,935.00	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.
6 Bell, Gregory	442	\$61,381.46 Secured	\$61,381.46	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.
7 Bhat, Rakesh Kumar	3827	\$40,100.00 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.
8 Blum, Merriman	252	Total Claim: \$40,000.00 Priority: Priority/GUC \$3,350.00	\$40,000.00	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).
9 Bufano, Richard	1503	Total Claim: \$84,000.00 Secured: Secured/GUC \$79,268.00	\$84,000.00	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.
10 Capp, Jamie	1766	Total Claim: \$87,383.18 Secured: Secured/GUC \$81,142.32	\$87,383.18	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.
11 Carley, Patrick	364		\$30,000.00	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).
12 Carley, Patrick	1357	Total Claim: \$73,000.00 Secured: Secured/Priority \$39,000.00 Priority: \$73,000.00	\$73,000.00	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. Further, 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).
13 Carley, Patrick	2109	Total Claim: \$73,000.00 Secured: Secured/Priority \$39,000.00 Priority: \$73,000.00	\$73,000.00	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. Further, 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
14 Ceckauskas, Simas	449	\$44,162.17 Secured	\$44,162.17	General Unsecured	liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a). 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,
15 Ceckauskas, Simas	468	\$44,162.17 Secured	\$44,162.17	General Unsecured	and the Claim is therefore ineligible for secured status. 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,
16 Chatham, John	99	Total Claim: \$78,107.00 Secured: Secured/GUC \$46,563.39	\$78,107.00	General Unsecured	and the Claim is therefore ineligible for secured status. 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.
17 Chavarria, Jonathan	1379		\$8,000.00	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).
18 Cherdsuriya, Vichien	2397	Total Claim: Unliquidated Priority: Priority/GUC \$250	Unliquidate	d 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. Documentation attached does not support claim that the liability asserted is entitled to priority status pursuant to 11 U.S.C. § 507(a)(7) as it demonstrates that Claimant received the vehicle after making the deposit.
19 Christensen, Thomas Ordrup Huusom	2630	Total Claim: \$92,460.00 Secured: Secured/GUC \$60,000.00	\$92,460.00	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.
20 Coleman, Sherman	3563	Total Claim: \$82,132.24 Priority: Priority/GUC \$3,350.00	\$82,132.24	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).
21 Connor, Derrick	439	\$80,000.00 Secured	\$80,000.00	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.
22 Cronin, Ryan	59	\$64,417.63 Secured	\$64,417.63	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 Davila, Jorge Lobo	296	Total Claim: \$77,859.19 Secured: Secured/GUC \$46,600.42	\$77,859.19	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 Davila, Jorge Lobo	1340	Total Claim: \$77,859.19 Secured: Secured/GUC \$45,261.91	\$77,859.19	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 deNagy, David	1204	\$87,626.00 Secured	\$87,626.00	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.
26 Denham, Simon	3493	Total Claim: \$61,160.00 Priority: Priority/GUC \$50,000.00	\$61,160.00	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
27 Dexter, Deborah	2968		\$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.
28 Dexter, Deborah	2971	\$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.
29 Dexter, Deborah	2973	\$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.

30 Dexter, Deborah	2974	\$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.
31 Didkovskaya, Kira	83	\$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.
32 Dominick, David Matthew	624	Total Claim: \$123,710.35 Secured: \$70,519.00 Priority: \$1,000.00		\$123,710.35	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. Further, 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).
33 El Monte Community Credit Union	3142	\$79,532.02	Secured	\$79,532.02	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 Eshraghi, Saeed	372	\$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.
35 Eshraghi, Saeed	1229	Total Claim: \$78,134.00 Secured: \$64,549.20 Priority: \$3,410.00		\$78,134.00	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. Further, 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).
36 Fabian, Matthew	2442	Total Claim: \$69,000.00 Secured: \$69,000.00 Priority: \$3,350.00		\$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. Further, 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).
37 Ferrante Koberling Construction, Inc.	2094	\$355,820.94	Secured	\$355,820.94	General Unsecured	According to the Debtors' Books and Records, the liability asserted as secured has no legal basis. The mechanic's lien is not asserted against any property of the Debtors' estates. The Debtors previously leased the subject premises from The Grove LLC and the lease was terminated prior to the Petition Date.
38 Feroah, Michael L	3297	\$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.
39 Fletcher, Kelly	336	Total Claim: \$72,314.32 Secured: \$67,780.80	l l	\$72,314.32	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 Goldstein, Jeff	195	Total Claim: \$70,000.00 Secured: \$64,000.00		\$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.
41 Hall, Karine	2064	Total Claim: \$30,000.00 Secured: \$25,000.00		\$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.
42 Hememway, Marcus	3146	\$30,800.00	Priority	\$30,800.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(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).
43 Ho, Pak	452	Total Claim: \$878.00 Secured \$878.00 Priority: \$878.00	Secured/Priority	\$878.00	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. Further, 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).
44 Hoppe, Matthew	2025	\$11,000.00	Administrative Priority	\$11,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as an administrative expense priority claim pursuant to 11 U.S.C. § 503(b)(9) has no legal basis. Claim is related to vehicle purchase by the claimant and is not entitled to administrative expense priority under 11 U.S.C. § 503(b)(9).
45 International Cultural Exchange Service	s, Inc. 3596	Total Claim: \$80,546.22 Priority: \$5,905.97	1	\$80,546.22	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. 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)(8).
46 Ivanov, Rumen	329	Total Claim: \$74,931.84 Secured: \$49,821.73	1 · · · · · · · · · · · · · · · · · · ·	\$74,931.84	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.
47 Jensen, Torben Spuur	3231	\$87,435.00	Priority	\$87,435.00	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).
48 Jones, Adiah	3986	Total Claim: \$105,750.00 Secured: \$67,913.69	1 · · · · · · · · · · · · · · · · · · ·	\$105,750.00	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.
49 Konstandt, David	2342	Total Claim: Unliquidated Secured: \$62,000.00	I	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.
50 Kraemer, Chad	220	\$53,000.00	Secured	\$53,000.00	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 Krishnamoorthy, Kannan	1040	\$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.
52 Labinski, Michael	1605	Total Claim: \$75,552.82 Secured: \$69,552.82 Priority: \$3,350.00		\$75,552.82	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. Further, 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).
53 Levey, Jon	2175	Total Claim: \$77,494.99 Priority: \$3,350.00	1 "	\$77,494.99	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).
54 Lincoln, Desrene	79	\$50,000.00	Secured	\$50,000.00	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.
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55	Lock, Christopher	Total Claim: \$50,000.00 Priority: \$1,800.00	Priority/GUC \$50,000.0	OO 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).
56	Madrid, Jacob 204	\$36,770.96	Secured \$36,770.9	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.
57 (Mateo, David 38	78 Total Claim: \$92,125.64 Secured: \$77,660	Secured/GUC \$92,125.6	64 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	Mehta, Aditya 5	77 Total Claim: \$50,000.00 Priority: \$3,350.00	Priority/GUC \$50,000.0	OO 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).
59 (Moerkeberg, Per 29	76 Total Claim: \$84,347.00 Secured: \$84,347.00 Priority: \$84,347.00		OO 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. Further, 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).
60	Mora, Pablo 259	74 Total Claim: \$85,222.24 Priority: \$5,250.00	l	24 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).
61	Muddana, Murali 18	Total Claim: \$69,249.00 Priority: \$3,350.00	1 1	OO 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).
62	Mulford, Christopher 14	Total Claim: \$76,884.69 Secured: \$43,794.52	Secured/GUC \$76,884.6	69 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.
63	Nair, Kesav 29:	28 Total Claim: \$75,275.05 Secured: \$40,147.62 Priority: \$3,350.00		O5 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. Further, 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).
64	Nguyen, Tu 5:	4 \$45.87	Secured \$45.8	37 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.
65 (Ortiz, Osnalza 38	70 Total Claim: \$53,406.64 Priority: \$10,000.00		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. This is not a valid claim for a deposit as claimant received her car. 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).
66	Penton, Steven Victor 112	25 Total Claim: \$58,046.96 Priority: \$250.00	l '	96 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).
67	Rider, Curtis 19	55 Total Claim: \$82,460.49 Secured: \$57,817.61		49 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.
68	Robledo, Daniel 124	\$3,600.00	Secured \$3,600.0	OO 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.
69	Rosenthal, Michael 330	05 Total Claim: \$68,344.49 Secured: \$33,303.79	Secured/GUC \$68,344.4	49 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.
70	Rosenthal, Michael 333	36 Total Claim: \$68,344.49 Secured: \$33,303.79	Secured/GUC \$68,344.4	49 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.
71	Sack, Kevin 30	56 Total Claim: \$72,487.00 Secured: \$22,487.00		OO 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.
72	Santucci, Jacques 11	\$30,000.00	Administrative Priority \$30,000.0	OO General Unsecured	According to the Debtors' Books and Records, the liability asserted as an administrative expense priority claim pursuant to 11 U.S.C. § 503(b)(9) has no legal basis. Claim is related to vehicle purchase by the claimant and is not entitled to administrative expense priority under 11 U.S.C. § 503(b)(9).
73	Scott, Evan Patrick 124	Total Claim: \$28,737.00 Priority: \$1,000.00	Priority/GUC \$28,737.0	OO 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).
74 5	Scott, Samuel 236	59 Total Claim: \$80,410.52 Secured: \$75,160.52	Secured/GUC \$80,410.9	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.
75	Shah, Mitesh	\$40,000.00	Secured \$40,000.0	OO 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.
76	Shtyfman, Vladimir	\$7,000.00	Secured \$7,000.0	OO 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.
77 :	Siegel, Benjamin 328	\$53,866.81	Secured \$53,866.8	31 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.
78	Smith, Alicia L 28	76 Total Claim: \$87,843.53 Secured: \$39,815.78	Secured/GUC \$87,843.5	53 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.
79	Sofis, George T. 313	33 Total Claim: \$75,870.37 Priority: \$1,800.00	l	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).
80 :	Spear, Bonnie 254	Total Claim: \$127,962.00 Priority: \$9,100.00	l	OO 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).
81	Stephens, Randall RJ	\$45,000.00	Secured \$45,000.0	OO 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.

82 Stovner, Eric C	2315	Total Claim: \$91,180.00 Priority: \$3,350.00	1	\$91,180.00	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).
83 Tanguay, Dan	4031	\$85,000.00	Priority	\$85,000.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(4) 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)(4).
84 Tapia, Felix	2193	\$5,000.00	Priority	\$5,000.00	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).
85 Verghese, Mathew	1413	Total Claim: \$181,159.00 Priority: \$11,085.00		\$181,159.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(8) 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)(8).
86 Villela, Gilbert	3373	Total Claim: \$70,000.00 Priority: \$1,000.00		\$70,000.00	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).
87 Viviene New York, LLC	424	\$6,500.00	Priority	\$6,500.00	General Unsecured	According to the Debtors' Books and Records, the liability asserted as a priority claim pursuant to 11 U.S.C. § 507(a)(4) 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)(4).
88 von Wong, Johnson	1234	Total Claim: \$42,000.00 Secured: \$41,307.73	Secured/GUC	\$42,000.00	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.
89 Watson JR, Michael Lydell	579	Total Claim: \$32,443.77 Priority: \$3,350.00	• • • • • • • • • • • • • • • • • • • •	\$32,443.77	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).
90 Winterholler, Erika	359	Total Claim: \$79,364.00 Secured: \$63,014.48 Priority: \$1,000.00	·	\$79,364.00	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. Further, 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).
91 Yassine, Bassam	297	\$3,133.00	Priority	\$3,133.00	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).
92 Zier, Vena	3158	Total Claim: \$30,000.00 Secured: \$30,000.00 Priority: \$30,000.00	,	\$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. Further, 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).

EXHIBIT B

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:		Chapter 11
FISKER, INC., et al., 1		Case No. 24-11390 (TMH)
	Debtors.	(Jointly Administered)

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 CLAIMS; AND (II) MISCLASSIFIED CLAIMS

- I, Rick Wright, hereby declare under penalty of perjury:
- 1. I submit this declaration (the "<u>Declaration</u>") in support of 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 Claims; and (II) Misclassified Claims (the "<u>Objection</u>"),² filed by Matthew Dundon, solely in his capacity as the Liquidating Trustee (the "<u>Liquidating Trustee</u>") of the Fisker Liquidating Trust.
- 2. I am a Managing Director at Dundon Advisers. In that capacity, I work under the direction of the Liquidating Trustee. I am familiar with the day-to-day operations, businesses, financial affairs, and books and records of Fisker, Inc. and its debtor affiliates (collectively, the "**Debtors**"). I make this Declaration on the basis of the review, by myself and those under my direction, of the Debtors' respective books and records (the "**Books and Records**"), the register

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.

Any capitalized term used but not otherwise defined herein shall have the meaning ascribed to it in the Objection.

of claims (the "<u>Claims Register</u>") prepared and provided by the Debtors' (and the Liquidating Trust's) notice and claims agent, Kurtzman Carson Consultants dba Verita Global ("<u>Verita</u>"), and the Proofs of Claim filed in these Chapter 11 Cases.

- 3. All matters set forth in this Declaration are based on: (a) my personal knowledge; (b) my review of relevant documents; (c) my view, based on my experience and knowledge of the Debtors' operations and Books and Records; (d) information supplied to me by others at my request; and (e) as to matters involving United States bankruptcy law or rules or other applicable laws, my reliance on the advice of counsel or other advisors to the Liquidating Trustee. If called upon to testify, I could and would testify competently to the facts set forth herein.
- 4. During the Claims reconciliation process, the Reviewing Parties have conducted, and continue to conduct, a review of the Claims filed in the Chapter 11 Cases. In this regard, I, or another person at my direction, participated in the review of both the Claims Register and the Books and Records with respect to identifying certain Disputed Claims that are objectionable on substantive grounds, i.e., the No Liability Claims and the Misclassified Claims. I have read the Objection, the Proposed Order, and <u>Schedule 1</u> and <u>Schedule 2</u> attached to the Proposed Order, and I am familiar with the information contained therein.
- 5. Upon the review of the Proofs of Claim filed in these Chapter 11 Cases, I have identified the Disputed Claims. To the best of my knowledge, information, and belief, and insofar as I have been able to ascertain after reasonable inquiry and investigation of the Books and Records, the Proofs of Claim, and all documentation submitted with the Proofs of Claim, each of the Claims listed on **Schedule 1** and **Schedule 2** attached to the Proposed Order represent Disputed Claims that should be disallowed in full and expunged and/or reclassified, as applicable, as set forth therein and further discussed below.

- 6. No Liability Claims. To the best of my knowledge and belief, and based on the information and records available to me, the Claims listed on Schedule 1 to the Proposed Order cannot be reconciled with the Books and Records. To the best of my knowledge and belief, and based on the information and records available to me, the No Liability Claims are not valid because of one or more of the following reasons: (i) the Books and Records do not reflect the existence of the asserted Claim or of the claimant asserting such Claim, or otherwise indicate a scheduled liability of zero and/or disputed liability with respect to such Claim; (ii) the Claims provide either no documentation or insufficient supporting documentation to provide prima facie evidence of the validity and amount of the Claim; (iii) the Claims are not enforceable against the Debtors or their property under any agreement or applicable law; or (iv) the claimant waived, released, or is estopped from asserting the Claim against any of the Debtors' estates. If the relief sought is granted, each of the No Liability Claims will be disallowed and expunged in its entirety.
- 7. <u>Misclassified Claims</u>. To the best of my knowledge and belief, and based on the information and records available to me, the Claims identified on <u>Schedule 2</u> to the Proposed Order were each asserted as secured, priority and/or administrative when they are not entitled to such priority. If the relief sought is granted, the Misclassified Claims identified on <u>Schedule 2</u> will be modified by reclassifying each such Claim, in whole or in part, to reflect the revised priority listed on <u>Schedule 2</u>.
- 8. Accordingly, based upon my review of the Claims Register and the Books and Records, I believe that granting the relief requested in the Objection is in the best interest of the Liquidating Trust, the Debtors' estates and their creditors.

Case 24-11390-TMH Doc 976-3 Filed 04/23/25 Page 5 of 5

Dated:	April	23,	2025
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/s/ Rick Wright
Rick Wright