

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

FISKER INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

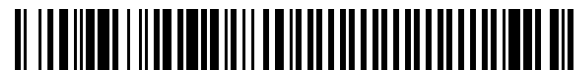
Re: Docket No. 950

**CERTIFICATE OF NO OBJECTION REGARDING LIQUIDATING TRUSTEE'S
MOTION FOR ENTRY OF AN ORDER FURTHER EXTENDING THE TIME PERIOD
TO FILE AND SERVE OBJECTIONS TO ADMINISTRATIVE CLAIMS**

The undersigned counsel to Matthew Dundon, solely in his capacity as the Liquidating Trustee (the “Liquidating Trustee”) of the Fisker Liquidating Trust (the “Liquidating Trust”), hereby certifies that, as of the date hereof, no answer, objection, or other responsive pleading has been filed or received to the *Liquidating Trustee’s Motion for Entry of an Order Further Extending the Time Period to File and Serve Objections to Administrative Claims* [Docket No. 950] (the “Motion”) filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) on April 10, 2025. Pursuant to the Notice of Motion, objections to the Motion were to be filed and served no later than April 24, 2025 at 4:00 p.m. (ET) (the “Objection Deadline”).

The Objection Deadline has passed, and no objections or other responsive pleading to the Motion appear on the docket or were served upon the undersigned counsel. It is therefore respectfully requested that the Court enter the Proposed Order attached hereto as **Exhibit A** at the earliest convenience of the Court.

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



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Dated: April 25, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Justin R. Alberto

COLE SCHOTZ P.C.

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Co-Counsel to the Liquidating Trustee

Exhibit A

Proposed Form of Order

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

In re:

FISKER, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

Re: D.I. 950

**ORDER FURTHER EXTENDING THE TIME PERIOD TO FILE AND SERVE
OBJECTIONS TO ADMINISTRATIVE CLAIMS**

THIS MATTER having come before the Court upon the *Liquidating Trustee's Motion for Entry of an Order Further Extending the Time Period to File and Serve Objections to Administrative Claims* (the "**Motion**"),² as more fully described in the Motion; and the Court having reviewed the Motion; and the Court finding that: (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated February 29, 2012; (ii) venue is appropriate pursuant to 28 U.S.C. §§ 1408 and 1409; (iii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and a final order may be entered on this matter under Article III of the U.S. Constitution; (iv) notice of the Motion was sufficient under the circumstances and no other or further notice is necessary; and (v) a sound business purpose exists for the relief granted herein; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The Administrative Claims Objection Deadline is further extended through and including August 18, 2025, without prejudice to the Liquidating Trustee's right to seek further extensions of the Administrative Claims Objection Deadline.
3. The Liquidating Trustee and his authorized representatives are authorized and empowered to take any and all actions necessary to implement the terms of this Order.
4. The terms and conditions of this Order shall be immediately enforceable and effective upon its entry.
5. This Court retains jurisdiction over all matters arising from or related to the interpretation, implementation and enforcement of this Order.