

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. 1022

**CERTIFICATE OF NO OBJECTION REGARDING MOTION OF GOE FORSYTHE &
HODGES LLP AND ROBERT GOE TO WITHDRAW AS COUNSEL TO
IDEAL MOTORS CORP.**

1. The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection, or other responsive pleading to the final approval of the *Motion Goe Forsythe & Hodges LLP And Robert Goe to Withdraw as Counsel for Ideal Motors Corp.* [D.I. 1022] (the “Motion”) filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) on May 21, 2025.

2. The undersigned further certifies that, as of the date hereof, he has reviewed the Court’s docket in these cases and no answer, objection, or other responsive pleading to final approval of the Motion appears thereon. Pursuant to the Notice of the Motion, objections or responses, if any, to the Motion were to be filed with the Court and served upon the undersigned counsel June 4, 2025 at 4:00 p.m. (ET).

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. ² The Debtors and their direct and indirect non-Debtor subsidiaries are collectively referred to herein as “Fisker.”



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3. As no responses to the Motion have been received, it is hereby respectfully requested that the Proposed Order granting the Motion, attached hereto as Exhibit “1” and to the Motion as Exhibit “A”, be entered at the earliest convenience of the Court.

Dated: June 13, 2025

LOIZIDES, P.A.

/s/ Christopher D. Loizides

Christopher D. Loizides (No. 3968)

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EXHIBIT 1

**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. 1022, ____

**ORDER GRANTING MOTION OF
GOE FORSYTHE & HODGES LLP AND ROBERT GOE TO
WITHDRAW AS COUNSEL TO IDEAL MOTORS CORP.**

Upon consideration of the *Motion of Goe Forsythe & Hodges LLP and Robert Goe to Withdraw as Counsel for Ideal Motors Corp.* (the “Motion”), and having found that good cause exists for granting the relief requested in the Motion, it is hereby ORDERED that:

1. The Motion is GRANTED.
2. Goe Forsythe & Hodges LLP and Robert Goe shall be and are hereby withdrawn as counsel of record for Ideal Motors Corp. in the above-captioned bankruptcy case.

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. ² The Debtors and their direct and indirect non-Debtor subsidiaries are collectively referred to herein as “Fisker.”