

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

In re:

FISKER, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

**Re: Docket No. 1055**

**CERTIFICATE OF NO OBJECTION REGARDING LIQUIDATING TRUSTEE'S  
TENTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) PURSUANT TO  
11 U.S.C. § 502, FED. R. BANKR. P. 3007 AND LOCAL RULE 3007-1  
TO CERTAIN AMENDED AND SUPERSEDED CLAIMS**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 Tenth Omnibus Objection (Non-Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain Amended and Superseded Claims* [Docket No. 1055] (the “Objection”) filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) on June 23, 2025. Responses to the Objection were to be filed and served no later than July 14, 2025 at 4:00 p.m. (ET) (the “Objection Deadline”).

The Objection Deadline has passed, and no objections or other responsive pleading to the Objection 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.

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<sup>1</sup> 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.



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Dated: July 15, 2025  
Wilmington, Delaware

**COLE SCHOTZ P.C.**

/s/ Melissa M. Hartlipp

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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.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

**Re: D.I. 1055**

**ORDER GRANTING LIQUIDATING TRUSTEE'S TENTH OMNIBUS OBJECTION  
(NON-SUBSTANTIVE) PURSUANT TO 11 U.S.C. § 502, FED. R. BANKR. P. 3007 AND  
LOCAL RULE 3007-1 TO CERTAIN AMENDED AND SUPERSEDED CLAIMS**

THIS MATTER having come before the Court<sup>2</sup> upon the *Liquidating Trustee's Tenth Omnibus Objection (Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain Amended and Superseded 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 the Disputed Claims listed on **Schedule 1** 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 given; and it appearing that no other notice need be given; and the Court having considered the

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<sup>1</sup> 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.

<sup>2</sup> Any capitalized term used but not otherwise defined herein shall have the meaning ascribed to it in the Objection.

Objection, the Disputed Claims listed on **Schedule 1** 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 **Schedule 1** 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 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 Amended/Superseded Claims on **Schedule 1** hereto is hereby disallowed and expunged in its entirety.

4. The Liquidating Trustee's rights to further object at a later date and on any basis to Disputed Claims on **Schedule 1** hereto are fully preserved.

5. The official claims register in these Chapter 11 Cases shall be modified in accordance with this Order.

6. 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.

7. 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).

8. 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.

**Schedule 1 – Amended and Superseded Claims**

Row No.	Claimant	Surviving Claim No. <sup>1</sup>	Asserted Claim Amount and Priority	Amended and Superseded Claim to be Disallowed	Asserted Claim Amount and Priority	Reason for Disallowance
1	Arizona Department of Revenue	4063	Total: \$75.00 Priority: \$50 General Unsecured: \$25	276	Total: \$42,075.00 Priority: \$42,050.00 General Unsecured: \$25.00	Surviving Claim amends and supersedes Claim to be disallowed.
2	California Department of Tax and Fee Administration	4271	Total: \$2,754.00 Priority: \$2,754.00	4053	Total: \$88,612.42 Priority: \$88,612.42	Surviving Claim amends and supersedes Claim to be disallowed.
3	Department of Treasury - Internal Revenue Service	4209	Total: \$0	377	Total: \$2,662,037.50 Priority: \$2,662,037.50	Surviving Claim amends and supersedes Claim to be disallowed.
4	Department of Treasury - Internal Revenue Service	3844	Total: \$8,512.23 Priority: \$5,000.00 General Unsecured: \$3,512.23	379	Total: \$13,512.23 Priority: \$10,000.00 General Unsecured: \$3,512.23	Surviving Claim amends and supersedes Claim to be disallowed.
5	Department of Treasury - Internal Revenue Service	4260	Total: \$3,512.23 General Unsecured: \$3,512.23	3844	Total: \$8,512.23 Priority: \$5,000.00 General Unsecured: \$3,512.23	Surviving Claim amends and supersedes Claim to be disallowed.

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<sup>1</sup> As the claims reconciliation process is ongoing, the Liquidating Trustee reserves all rights to object to any surviving Claim on any grounds.

Row No.	Claimant	Surviving Claim No. <sup>1</sup>	Asserted Claim Amount and Priority	Amended and Superseded Claim to be Disallowed	Asserted Claim Amount and Priority	Reason for Disallowance
6	Illinois Department of Revenue	3725	Total: \$651,053.72 Priority: \$592,404.62 General Unsecured: \$58,649.10	338	Total: \$585,266.00 Priority: \$585,241.00 General Unsecured: \$25.00	Surviving Claim amends and supersedes Claim to be disallowed.
7	Illinois Department of Revenue	4270	Total: \$25.00 General Unsecured: \$25.00	3725	Total: \$651,053.72 Priority: \$592,404.62 General Unsecured: \$58,649.10	Surviving Claim amends and supersedes Claim to be disallowed.
8	Massachusetts Department of Revenue	4100 <sup>2</sup>	Total: \$104,587.07 Priority: \$89,739.74 General Unsecured: \$14,847.33	13	Total: \$103,554.87 Priority: 88,997.68 General Unsecured: \$14,557.19	Surviving Claim amends and supersedes Claim to be disallowed.
9	Texas Workforce Commission	639	Total: \$15,583.09 Secured: \$15,583.09	6	Total: \$15,461.59 Secured: \$15,461.59	Surviving Claim amends and supersedes Claim to be disallowed.
10	Texas Workforce Commission	676	Total: \$15,583.09 Secured: \$15,583.09	639	Total: \$15,583.09 Secured: \$15,583.09	Surviving Claim amends and supersedes Claim to be disallowed.

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<sup>2</sup> Claim number 4100 is subject to a separate pending omnibus objection as a satisfied claim.