

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)

Hearing Date: September 3, 2025 at 11:00 a.m. (ET)

Objection Deadline: August 22, 2025 at 4:00 p.m. (ET)

LIQUIDATING TRUSTEE'S ELEVENTH OMNIBUS OBJECTION (NON-
SUBSTANTIVE) PURSUANT TO 11 U.S.C. § 502, FED. R. BANKR. P. 3007 AND
LOCAL RULE 3007-1 TO CERTAIN LATE-FILED CLAIMS

***CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES
AND CLAIMS IN THE EXHIBITS TO THE OBJECTION***

Matthew Dundon, solely in his capacity as the Liquidating Trustee (the “Liquidating Trustee”) of the Fisker Liquidating Trust (the “Liquidating Trust”), hereby submits this eleventh omnibus objection (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 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”) disallowing in full and expunging the late-filed claims listed on Schedule 1 to the Proposed Order (the “Late-Filed Claims” or the “Disputed Claims”). In support of the Objection, the Liquidating Trustee submits the: (i) Declaration of Rick Wright (the “Wright Declaration,” a copy of which is attached hereto

¹ 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.



as **Exhibit B** and incorporated by reference herein); and (ii) Declaration of Darlene Calderon (the “**Calderon Declaration**”), and respectively represents as follows:

JURISDICTION, VENUE AND STATUTORY BASIS

1. The United States District Court for the District of Delaware has jurisdiction over this Motion 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.

BACKGROUND

A. The Chapter 11 Cases

4. On June 17 and 19, 2024, as applicable (the “**Petition Date**”), Fisker, Inc. and its debtor affiliates (the “**Debtors**”) commenced the above-captioned cases (the “**Chapter 11 Cases**”) in the Court under chapter 11 of the Bankruptcy Code.

² 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.

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**”) [D.I. 713].³

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.

8. On October 17, 2024 (the “**Effective Date**”), the Plan went effective. *See 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

³ Any capitalized term used but not otherwise defined herein shall have the meaning ascribed to it in the Plan.

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 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 “**Government Bar Date**”) 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 rejected 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 Claim**”).

and Rejection Bar Date” and, together with the General Bar Date and the Government Bar Date, the “**Bar Dates**”).

15. Consequently, all applicable Bar Dates have passed.

C. The Notice of Bar Dates

16. On August 21, 2024, the Liquidating Trust’s (and formerly, the Debtors’) claims and noticing agent, Kurtzman Carson Consultants, LLC dba Verita Global (“**Verita**”) caused the Notice of Bar Dates for Filing Proofs of Claim Against the Debtors [substantially in the form attached as **Exhibit 2** to D.I. 458] (the “**Notice of Bar Dates**”) to be served via first-class mail upon each claimant listed on Schedule 1 to the Proposed Order at their last known address on file,⁴ along with a Modified Official Form 410 Proof of Claim [substantially in the form attached at **Exhibit 1** to D.I. 458], customized for each individual claimant. *See* Calderon Declaration at ¶ 4, 5 (attaching a true and correct copy of the Notice of Bar Dates); *see also Certificate of Service of Scott M. Ewing re: 1) Modified Official Form 410 Proof of Claim; and 2) Notice of Bar Dates for Filing Proofs of Claim Against the Debtors* [D.I. 495], filed on August 29, 2024.

17. The Notice of Bar Dates provides as follows:

On August 19, 2024, the Court entered an order ... establishing the following deadlines for filing certain prepetition claims ... in the Debtors’ Chapter 11 Cases: (a) **September 11, 2024, 5:00 p.m. prevailing Eastern Time** as the deadline (the “**General Bar Date**”) to file a proof of claim in respect of any prepetition claim against any of the Debtors, including, without limitation, any secured claim, unsecured claim, priority claim, or claim asserted under section 503(b)(9) of the Bankruptcy Code for goods delivered and received by any of the Debtors within twenty (20) days before the Petition Date, unless otherwise provided in the Bar Date Order.

⁴ Consistent with the *Final Order (i) Waiving the Requirement to File a List of Equity Security Holders and (ii) Authorizing Debtors to Redact Certain Personal Information* [D.I. 290], the Liquidating Trustee is not listing the claimants’ individual home addresses to protect such individuals’ privacy.

See Notice of Bar Dates.

18. The Notice of Bar Dates further provides:

Instructions for Filing Proofs of Claim for Prepetition Claims.

Any person or entity asserting a prepetition claim against the Debtors MUST abide by the following procedures and requirements in preparing and filing proofs of claim: ... [a] claim must be submitted **so as to be actually received** on or before the applicable Bar Date. Proofs of claim sent by means other than as described above will not be accepted. **It is NOT sufficient for the Proof of Claim to be post-marked by the applicable Bar Date. It must be RECEIVED by the applicable Bar Date.**

Consequences of Failing to Timely File Your Claim. ABSENT FURTHER ORDER OF THE COURT, ANY HOLDER OF A CLAIM THAT IS NOT EXEMPTED FROM THE REQUIREMENTS OF THE BAR DATE ORDER, AS SET FORTH ABOVE, AND THAT FAILS TO TIMELY FILE A PROOF OF CLAIM IN THE APPROPRIATE FORM BY THE APPLICABLE BAR DATE AS DESCRIBED IN THIS NOTICE SHALL NOT BE TREATED AS A CREDITOR WITH RESPECT TO SUCH CLAIM FOR THE PURPOSES OF VOTING AND DISTRIBUTION.

See *Id.*

D. Claim Objection Deadlines

19. Pursuant to the *Order Extending the Time Period Within Which the Liquidating Trustee May File and Serve Objections to Claims and Interests Through and Including January 12, 2026* [D.I. 1068], the deadline for the Liquidating Trustee to object to Claims and Interests, other than Administrative Claims, is January 12, 2026 (the “**Prepetition Claims and Interests Objection Deadline**”), subject to the Liquidating Trustee’s right to seek additional extensions.

20. Pursuant to the *Order Further Extending the Period to File and Serve Objections to Administrative Claims* [D.I. 983], the deadline for the Liquidating Trustee to object to Administrative Claims, including Claims under Bankruptcy Code section 503(b)(9), is currently August 18, 2025 (the “**Administrative Claims Objection Deadline**”), subject to the Liquidating

Trustee's right to seek additional extensions. In that regard, on July 16, 2025, the Liquidating Trustee filed the *Motion of the Liquidating Trustee for Entry of an Order Further Extending the Time Period Within Which the Liquidating Trustee May File and Serve Objections to Administrative Claims* [D.I. 1072], seeking to further extend the Administrative Claims Objection Deadline through and including February 16, 2026. A hearing on the foregoing motion is set for September 3, 2025.

D. Claims Objection Procedures

21. In connection with the Claims and Interests reconciliation process, the Liquidating Trustee previously obtained approval of certain omnibus objection procedures intended to promote a reconciliation process that is conducted in a timely, efficient, and cost-effective manner. *See Order Granting Liquidating Trustee's Motion (I) Leave from Local Rule 3007-1(f) Related to the Filings of Substantive Omnibus Claim Objections; and (II) Related Relief* [D.I. 894].

E. The Claims and Interest Reconciliation Process

22. In the ordinary course of business, the Debtors maintained books and records (the "**Books and Records**") that reflect, *inter alia*, the Debtors' liabilities and the amounts owed to their creditors.

23. The Liquidating Trustee and his advisors (the "**Reviewing Parties**") have been and continue to undertake a comprehensive review of all Claims and Interests 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 such Claims. This process includes identifying categories of Claims and Interests that may be targeted for disallowance and expungement, reduction and/or reclassification.

24. Since the Effective Date, the Liquidating Trustee has filed ten (10) omnibus objections to Claims and/or Interests, focusing mainly on reclassification and/or disallowance and expungement in whole or in part of priority, secured and administrative Claims (the “**PSA Claims**”).

25. In addition to, and as part of, the formal objection process, the Liquidating Trustee continues to make progress in resolving certain remaining Claims and Interests through stipulated withdrawals, settlements and/or consensual reconciliations.

26. While the Liquidating Trustee has made considerable progress in the Claims and Interests reconciliation process, additional objections are required to resolve as-yet unreconciled Claims and Interests. More specifically, the process moving forward will focus mainly on the reconciliation of general unsecured Claims, along with the continued reconciliation of the remaining, unresolved PSA Claims.

27. The Liquidating Trustee has reviewed the Disputed Claims and has determined that such Claims are objectionable on non-substantive grounds and should be disallowed and expunged in full because such Claims are Late-Filed Claims.⁵

RELIEF REQUESTED

28. By this Objection and for the reasons described more fully herein, the Liquidating Trustee objects to the Late-Filed Claims set forth on **Schedule 1** to the Proposed Order. The Liquidating Trustee respectfully requests entry of the Proposed Order disallowing in full and expunging the Late-Filed Claims.

⁵ 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 Late-Filed Claims on any basis if applicable.

BASIS FOR RELIEF

29. Bankruptcy Code section 502(a) 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.” 11 U.S.C. § 502(a). Further, Bankruptcy Code section 502(b)(1) 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* 11 U.S.C. § 502(b)(1).

30. 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).

31. 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).

32. Pursuant to Bankruptcy Rule 3007(d), a debtor is permitted to file omnibus objections to more than one claim on the bases enumerated therein, which include, among other things, that such claims “were not timely filed.” *See* Fed. R. Bankr. P. 3007(d)(4).

33. 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). Further, Local Rule 3007-1(c) provides that “[a]n omnibus objection is deemed to be made on a substantive basis unless it is based on the following: ... (iv) Late filed claim.” *See* Del. Bankr. L.R. 3007-1(c)(iv).

34. For the reasons set forth below, there is ample evidence to rebut the *prima facie* validity of each of the Late-Filed Claims.

A. Late-Filed Claims

35. Pursuant to Bankruptcy Code section 502(b)(9), a claim shall not be allowed “to the extent that . . . proof of such claim is not timely filed[.]” 11 U.S.C. § 502(b)(9); *see also First Fidelity Bank, N.A. v. Hooker Inves. Inc. (In re Hooker Inves. Inc.)*, 937 F.2d 833, 840 (2d Cir. 1991) (enforcing the bar date and stating, *inter alia*, that “a bar date order does not function merely as a procedural gauntlet”); *In re Keene Corp.*, 188 B.R. 903, 907 (Bankr. S.D.N.Y. 1995) (stating that the “[b]ar date is akin to a statute of limitations, and must be strictly observed”).

36. Moreover, the timeliness of Claims asserted against the Debtors in these Chapter 11 Cases is determined with reference to the Bar Dates fixed by the Court, in accordance with Bankruptcy Rule 3003(c)(3). This rule contributes to one of the main purposes of bankruptcy law, which is securing -- within a limited time -- the prompt and effectual administration and settlement of a debtor’s estate. *In re New Century TRS Holdings, Inc.*, 465 B.R. 38, 46 (Bankr. D. Del. 2012) (citing *In re Smidth & Co.*, 413 B.R. 161, 165 (Bankr. D. Del. 2009)). While setting an outside

limit for the time to assert a right triggers due process concerns of which every court must be cognizant, this concern is resolved through notice. *Id.*

37. The Notice of Bar Dates was served upon, among others, all of the claimants that filed the Late-Filed Claims identified on **Schedule 1** to the Proposed Order, and listed September 11, 2024 at 5:00 p.m. (prevailing Eastern Time) as the General Bar Date. *See* Calderon Declaration at ¶ 4; *see also* Notice of Bar Dates. The Notice of Bar Dates further contained clear and explicit instructions to creditors as to the process by which they may file Proofs of Claim. *See* Notice of Bar Dates.

38. For creditors who receive proper notice, the bar date is a “drop-dead date” that prevents a creditor from asserting prepetition claims unless he can demonstrate excusable neglect. *In re TransWorld Airlines, Inc.*, 96 F.3d 687, 690 (3d Cir. 1996).

39. The Liquidating Trustee has determined that the Proofs of Claim reflected on **Schedule 1** to the Proposed Order were filed after the applicable Bar Date, and that there is no basis to nevertheless accept the Late-Filed Claims as timely. Indeed, such Claims: (a) arose prior to the Petition Date; (b) were subject to the requirement that Proofs of Claim be filed no later than the applicable Bar Date; and (c) were nonetheless filed after the applicable Bar Date, as indicated by the dates identified in the column headed “Date Claim Filed” on **Schedule 1** to the Proposed Order.

40. Furthermore, none of the claimants identified on **Schedule 1** to the Proposed Order have sought —much less obtained—relief from the Court pursuant to Bankruptcy Rule 9006 to file a late Proof of Claim or otherwise demonstrated excusable neglect, despite that the applicable Bar Date occurred nearly one year ago.

41. Accordingly, the Late-Filed Claims are untimely under the Bar Date Order, the Plan and/or the Confirmation Order and should be disallowed in their entirety and expunged pursuant to Bankruptcy Code section 502(b)(9). Moreover, permitting the Late-Filed Claims would hinder the bankruptcy process and the Plan because parties that filed late Claims could receive a recovery to which they are not entitled to the detriment of holders of properly filed allowed Claims if such Late-Filed Claims were ultimately allowed. *See e.g., Bank of Am. Nat'l Trust & Sav. Ass'n v. 203 N. LaSalle St. P'ship*, 526 U.S. 434, 453 (1999) (bar dates play an essential role in the important goal of maximizing property available to satisfy creditors).

RESPONSES TO OMNIBUS OBJECTIONS

42. To contest the Objection, a claimant must file and serve a written response to this Objection (a “**Response**”) so that it is received no later than August 22, 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 co-counsel to the Liquidating Trustee.

43. 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.

44. 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 the Disputed Claims without further notice to the claimant.

REPLIES TO RESPONSES

45. 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

46. Each of the above objections to the Disputed Claims constitutes 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

47. The Liquidating Trustee expressly reserves the right to amend, modify or supplement this Objection and 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. 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

48. Notice of this Objection has been provided via first class mail to (i) the Office of the United States Trustee for the District of Delaware; (ii) all the Claimants listed on **Schedule 1** to the Proposed Order and their counsel, if known; 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

49. The undersigned representative of Cole Schotz P.C. ("**Cole Schotz**") certifies that he 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

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

Dated: August 1, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Justin R. Alberto

Justin R. Alberto (No. 5126)
Melissa M. Hartlipp (No. 7063)
500 Delaware Avenue, Suite 600
Wilmington, Delaware 19801
Telephone: (302) 652-3131
Facsimile: (302) 652-3117
Email: jalberto@coleschotz.com
mhartlipp@coleschotz.com

-and-

ASK LLP

Jason C. DiBattista (admitted *pro hac vice*)
Brigette G. McGrath (admitted *pro hac vice*)
2600 Eagan Woods Drive, Suite 400
St. Paul, Minnesota 55121
Telephone: (651) 406-9665
Facsimile: (651) 406-9676
Email: jdibattista@askllp.com
bmcgrath@askllp.com

and-

Marianna Udem (admitted *pro hac vice*)
60 East 42nd Street, 46th Floor
New York, New York 10165
Telephone: (212) 267-7342
Facsimile: (212) 918-3427
Email: mudem@askllp.com

Co-Counsel to the Liquidating Trustee

**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)

Hearing Date: September 3, 2025 at 11:00 a.m. (ET)

Objection Deadline: August 22, 2025 at 4:00 p.m. (ET)

**NOTICE OF LIQUIDATING TRUSTEE'S ELEVENTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) PURSUANT TO 11 U.S.C. § 502, FED. R. BANKR. P. 3007 AND
LOCAL RULE 3007-1 TO CERTAIN LATE-FILED CLAIMS**

*****CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES
AND CLAIMS ON SCHEDULE 1 TO THE PROPOSED ORDER*****

PLEASE TAKE NOTICE, that on August 1, 2025, Matthew Dundon, solely in his capacity as the Liquidating Trustee (the “**Liquidating Trustee**”) of the Fisker Liquidating Trust, filed the *Liquidating Trustee’s Eleventh Omnibus Objection (Non-Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain Late-Filed Claims* (the “**Objection**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). 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 **August 22, 2025 at 4:00 p.m. (ET)** (the “**Response Deadline**”). At the same time, you 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 **September 3, 2025 at 11:00 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.

¹ 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.

Dated: August 1, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Justin R. Alberto

Justin R. Alberto (No. 5126)
Melissa M. Hartlipp (No. 7063)
500 Delaware Avenue, Suite 600
Wilmington, Delaware 19801
Telephone: (302) 652-3131
Facsimile: (302) 652-3117
Email: jalberto@coleschotz.com
mhartlipp@coleschotz.com

-and-

ASK LLP

Jason C. DiBattista (admitted *pro hac vice*)
Brigette G. McGrath (admitted *pro hac vice*)
2600 Eagan Woods Drive, Suite 400
St. Paul, Minnesota 55121
Telephone: (651) 406-9665
Facsimile: (651) 406-9676
Email: jdibattista@askllp.com
bmcgrath@askllp.com

and-

Marianna Udem (admitted *pro hac vice*)
60 East 42nd Street, 46th Floor
New York, New York 10165
Telephone: (212) 267-7342
Facsimile: (212) 918-3427
Email: mudem@askllp.com

Co-Counsel to the Liquidating Trustee

Exhibit A

**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. ____

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

THIS MATTER having come before the Court² upon the *Liquidating Trustee’s Eleventh Omnibus Objection (Non-Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain Late-Filed 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 Late-Filed 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 Objection, the

¹ 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.

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

Late-Filed 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 Late-Filed Claim listed on **Schedule 1** attached hereto was properly and timely served with a copy of the Objection, the Wright Declaration, the Calderon Declaration, this Order, the accompanying schedule of Late-Filed Claims, and the notice of Objection.

C. Any entity known to have an interest in the Late-Filed 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 Late-Filed 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 Late-Filed Claims on **Schedule 1** hereto, if necessary, 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 Late-Filed 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.

#	Name of Claimant	Date Filed	Claim Number	Claim Amount	Reason for Disallowance
1	A2MAC1, LLC	10/02/2024	3999	\$474,101.60	Claim was filed after the General Bar Date of September 11, 2024
2	Abbasi, Mohsen	01/04/2025	4230	\$71,000.00	Claim was filed after the General Bar Date of September 11, 2024
3	Adaptive Corporation	09/24/2024	3947	\$99,792.00	Claim was filed after the General Bar Date of September 11, 2024
4	Akeren, Inc.	09/24/2024	3953	\$500.00	Claim was filed after the General Bar Date of September 11, 2024
5	Albiar, Ruben K	10/10/2024	4050	\$350.00	Claim was filed after the General Bar Date of September 11, 2024
6	Ally, David	09/16/2024	3746	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
7	Al-Shamma, Waleed	09/14/2024	3795	\$1,000.00	Claim was filed after the General Bar Date of September 11, 2024
8	Arroyave, Juan	09/17/2024	3852	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
9	Ashani, Alireza Nazemi	03/10/2025	4256	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
10	ATA Engineering, Inc.	10/31/2024	4136	\$50,953.44	Claim was filed after the General Bar Date of September 11, 2024
11	Attack Research LLC	09/27/2024	3977	\$55,710.00	Claim was filed after the General Bar Date of September 11, 2024
12	Baboyan, Chris	09/12/2024	3716	\$350.00	Claim was filed after the General Bar Date of September 11, 2024
13	Bae, Chang	09/16/2024	3864	\$31,500.00	Claim was filed after the General Bar Date of September 11, 2024
14	Bae, Chang Ho	09/16/2024	3866	\$31,500.00	Claim was filed after the General Bar Date of September 11, 2024
15	Balmeo, Rommel	11/11/2024	4163	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
16	Bauer, Curtis	10/19/2024	4085	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
17	Baxi, Saurabh	09/18/2024	3734	\$70,000.00	Claim was filed after the General Bar Date of September 11, 2024
18	Beljana, Uab	10/02/2024	3994	\$3,538.00	Claim was filed after the General Bar Date of September 11, 2024
19	Bell, Nigel	11/23/2024	4193	\$1,650.00	Claim was filed after the General Bar Date of September 11, 2024
20	Bercutt, Pamela	10/01/2024	3987	\$55,000.00	Claim was filed after the General Bar Date of September 11, 2024
21	Berg, Stewart	09/25/2024	3944	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
22	Berger, Susan	10/21/2024	4092	\$46,209.18	Claim was filed after the General Bar Date of September 11, 2024
23	Bergeron, Dave	09/24/2024	3932	\$35,000.00	Claim was filed after the General Bar Date of September 11, 2024
24	Bhoir, Yashaswita	09/12/2024	3728	\$2,500.00	Claim was filed after the General Bar Date of September 11, 2024
25	Block, Mark	09/13/2024	3838	\$70,000.00	Claim was filed after the General Bar Date of September 11, 2024
26	Bradley, Ryan	01/06/2025	4233	\$1,000.00	Claim was filed after the General Bar Date of September 11, 2024
27	Brann, James G	09/30/2024	3984	\$35,000.00	Claim was filed after the General Bar Date of September 11, 2024
28	Bretos, Fernando	09/17/2024	3822	\$500.00	Claim was filed after the General Bar Date of September 11, 2024
29	Briesemeister, Linda	01/08/2025	4237	\$5,000.00	Claim was filed after the General Bar Date of September 11, 2024
30	Bruschera, Paul	09/13/2024	3847	\$597.45	Claim was filed after the General Bar Date of September 11, 2024
31	Bryner, Jeff	09/12/2024	3755	\$12,000.00	Claim was filed after the General Bar Date of September 11, 2024
32	Burns, Carly	09/15/2024	3801	\$1,000.00	Claim was filed after the General Bar Date of September 11, 2024
33	Capps, Stephanie	09/12/2024	3723	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
34	CDW LLC	09/16/2024	3890	\$1,460.92	Claim was filed after the General Bar Date of September 11, 2024
35	Cemelli, Jeffrey P	09/20/2024	3904	\$285,000.00	Claim was filed after the General Bar Date of September 11, 2024
36	Chabria, Manish	10/19/2024	4079	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
37	Chamorro, Derek	09/12/2024	3731	\$250.00	Claim was filed after the General Bar Date of September 11, 2024

38	Chavez, Silverio	09/16/2024	3859	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
39	Chen, Judy	09/16/2024	3813	\$72,000.00	Claim was filed after the General Bar Date of September 11, 2024
40	Cisneros, Veronica W	10/15/2024	4062	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
41	Clark, Justin	01/12/2025	4239	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
42	Colby, Jeremy	09/26/2024	3963	\$50,643.00	Claim was filed after the General Bar Date of September 11, 2024
43	Conner, Beatrice	09/12/2024	3710	\$50,000.00	Claim was filed after the General Bar Date of September 11, 2024
44	Couch, Laura Jean	09/16/2024	3814	\$60,925.58	Claim was filed after the General Bar Date of September 11, 2024
45	CPA Global FIP LLC	04/21/2025	4264	\$1,722.67	Claim was filed after the General Bar Date of September 11, 2024
46	Crain Communications Inc.	10/23/2024	4104	\$49,970.00	Claim was filed after the General Bar Date of September 11, 2024
47	Crane, James	09/12/2024	3750	\$300.00	Claim was filed after the General Bar Date of September 11, 2024
48	Crooks, Joan	09/30/2024	3980	\$10,000.00	Claim was filed after the General Bar Date of September 11, 2024
49	Crowley, Patrick	09/15/2024	3788	\$50,000.00	Claim was filed after the General Bar Date of September 11, 2024
50	Dabbagh, Karim	10/08/2024	4045	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
51	Daley, Samantha	09/18/2024	3937	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
52	D'Arcy, Thomas	09/17/2024	3823	\$49,595.00	Claim was filed after the General Bar Date of September 11, 2024
53	Davis, Charles	11/18/2024	4175	\$32,044.30	Claim was filed after the General Bar Date of September 11, 2024
54	Davis, John	09/17/2024	3815	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
55	Davis, Lisa	09/16/2024	3841	\$43,999.00	Claim was filed after the General Bar Date of September 11, 2024
56	DeGonza, Garry	09/12/2024	3722	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
57	Del Rio, Annie	09/17/2024	3855	\$50,000.00	Claim was filed after the General Bar Date of September 11, 2024
58	Desai, Cian	09/12/2024	3705	\$72,718.25	Claim was filed after the General Bar Date of September 11, 2024
59	Desai, Cian	10/01/2024	4036	\$72,718.75	Claim was filed after the General Bar Date of September 11, 2024
60	Desai, Viral	09/12/2024	3706	\$72,718.25	Claim was filed after the General Bar Date of September 11, 2024
61	Desai, Viral	10/01/2024	4035	\$72,718.75	Claim was filed after the General Bar Date of September 11, 2024
62	Dober, Martin	10/21/2024	4090	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
63	Duck-il Industry Co., Ltd.	09/13/2024	3790	\$383,581.00	Claim was filed after the General Bar Date of September 11, 2024
64	Durkin, Michael	09/12/2024	3707	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
65	Egan, Steve	10/21/2024	4091	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
66	Evans, William	10/27/2024	4120	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
67	Falco, Tony	09/21/2024	3913	\$500.00	Claim was filed after the General Bar Date of September 11, 2024
68	Farber, Matthew	10/28/2024	4125	\$1,195.00	Claim was filed after the General Bar Date of September 11, 2024
69	Ferguson, David	09/18/2024	3877	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
70	Finn, Mitch	10/10/2024	4051	\$1,000.00	Claim was filed after the General Bar Date of September 11, 2024
71	Fletcher, Lamont	10/07/2024	4042	\$40,201.01	Claim was filed after the General Bar Date of September 11, 2024
72	FMC Services DMCC	12/17/2024	4216	\$19,653.73	Claim was filed after the General Bar Date of September 11, 2024
73	Fowler, Dan	10/28/2024	4124	\$1,500.00	Claim was filed after the General Bar Date of September 11, 2024
74	Frazier, Bruce	09/16/2024	3857	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
75	Fuhr, Robert	10/22/2024	4103	\$250.00	Claim was filed after the General Bar Date of September 11, 2024

76	Gannett/USA Today	11/20/2024	4194	\$135,000.00	Claim was filed after the General Bar Date of September 11, 2024
77	Gardocki, Eva	09/17/2024	3820	\$6,893.00	Claim was filed after the General Bar Date of September 11, 2024
78	Garkani, Saman Ghaffari	10/18/2024	4077	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
79	Gestamp Auto Components Sales Tianjin Co., Ltd.	10/22/2024	4097	\$6,300,803.43	Claim was filed after the General Bar Date of September 11, 2024
80	Ghanavati, Habib	09/13/2024	3845	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
81	Givens, Jamell	09/18/2024	3720	\$76,300.00	Claim was filed after the General Bar Date of September 11, 2024
82	Gleitz, Ryan	09/18/2024	3853	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
83	GRAF ISOLA Rechtsanwälte GmbH	09/25/2024	3948	\$20,342.99	Claim was filed after the General Bar Date of September 11, 2024
84	Grant, Telaya	11/04/2024	4145	\$280.00	Claim was filed after the General Bar Date of September 11, 2024
85	Griffin, John	10/29/2024	4131	\$55,000.00	Claim was filed after the General Bar Date of September 11, 2024
86	Griffin, John	10/29/2024	4133	BLANK	Claim was filed after the General Bar Date of September 11, 2024
87	Gruner, Timothy	09/16/2024	3811	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
88	Gudipudi, Sandhya	10/02/2024	4001	\$350.00	Claim was filed after the General Bar Date of September 11, 2024
89	Gunatilleke, Sobitha	09/23/2024	3923	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
90	Gutierrez, Irene	09/13/2024	3777	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
91	Hall, Marcus	10/02/2024	3996	\$74,500.00	Claim was filed after the General Bar Date of September 11, 2024
92	Hamilton, Daryl	09/26/2024	3969	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
93	Hanjra, Satwinder	09/28/2024	3979	\$25,398.60	Claim was filed after the General Bar Date of September 11, 2024
94	Harris, David	10/28/2024	4115	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
95	Hearne, Marcus	10/20/2024	4088	\$1,000.00	Claim was filed after the General Bar Date of September 11, 2024
96	Hertz, Marc	09/17/2024	3754	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
97	Hested, Bryan	09/13/2024	3780	\$1,000.00	Claim was filed after the General Bar Date of September 11, 2024
98	Hines, Bobby C	09/18/2024	3718	\$49,999.00	Claim was filed after the General Bar Date of September 11, 2024
99	Hiu, Philip	09/24/2024	3935	\$3,858.33	Claim was filed after the General Bar Date of September 11, 2024
100	Hodgson, Philip	10/01/2024	3992	\$67,739.94	Claim was filed after the General Bar Date of September 11, 2024
101	Hoffman, Shay	10/25/2024	4118	\$75,234.14	Claim was filed after the General Bar Date of September 11, 2024
102	Hovland, Matthew	09/18/2024	3850	\$74,105.50	Claim was filed after the General Bar Date of September 11, 2024
103	Huda, Mohammed	09/12/2024	3753	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
104	Hussman, Ryan	10/03/2024	4006	\$78,182.00	Claim was filed after the General Bar Date of September 11, 2024
105	Imada, Shane	10/24/2024	4113	\$5,250.00	Claim was filed after the General Bar Date of September 11, 2024
106	Intertrust (Belgium) NV/SA	09/12/2024	3871	\$6,114.28	Claim was filed after the General Bar Date of September 11, 2024
107	Intrepid Control Systems, Inc.	10/17/2024	4068	\$148,224.68	Claim was filed after the General Bar Date of September 11, 2024
108	Jaffe, Ari H.	10/06/2024	4033	\$40,000.00	Claim was filed after the General Bar Date of September 11, 2024
109	Joshi, Pranav	10/11/2024	4054	\$50,000.00	Claim was filed after the General Bar Date of September 11, 2024
110	Judge, Timothy	09/19/2024	3873	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
111	Kabakov, Mikhail	09/18/2024	3824	\$66,000.00	Claim was filed after the General Bar Date of September 11, 2024

112	Kash, Gouzel	11/06/2024	4147	\$13,565.10	Claim was filed after the General Bar Date of September 11, 2024
113	Katragadda, Lakshmikanth	01/26/2025	4244	\$80,000.00	Claim was filed after the General Bar Date of September 11, 2024
114	Kennedy, Lisa	09/13/2024	3839	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
115	Khameneh, Shawn	09/15/2024	3800	\$77,814.69	Claim was filed after the General Bar Date of September 11, 2024
116	Khan, Naveed	11/18/2024	4182	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
117	King, Jennifer	10/23/2024	4105	\$75,000.00	Claim was filed after the General Bar Date of September 11, 2024
118	Knaus, Tory	09/25/2024	3951	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
119	Knowles, Clio	10/21/2024	4095	\$5,250.00	Claim was filed after the General Bar Date of September 11, 2024
120	Kong, Sang	09/30/2024	3981	\$38,348.00	Claim was filed after the General Bar Date of September 11, 2024
121	Krishna, Rama	03/14/2025	4258	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
122	Kumar, Ramdas	10/30/2024	4135	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
123	Kumar, Sanil	09/22/2024	3918	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
124	LaCroix, Jeremy	09/13/2024	3769	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
125	Lampert, Stewart	10/21/2024	4096	\$1,000.00	Claim was filed after the General Bar Date of September 11, 2024
126	Larkin, Thomas	12/06/2024	4210	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
127	Laursen, Ulrik	09/12/2024	3752	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
128	Ledbetter, Paul	10/14/2024	4058	\$800.00	Claim was filed after the General Bar Date of September 11, 2024
129	Lemberg, Mary	10/30/2024	4134	\$75,273.85	Claim was filed after the General Bar Date of September 11, 2024
130	Levinson, Ronald	09/27/2024	3976	\$1,000.00	Claim was filed after the General Bar Date of September 11, 2024
131	Lewis, Alex	09/12/2024	3833	\$72,000.00	Claim was filed after the General Bar Date of September 11, 2024
132	Liu, Tom	12/20/2024	4222	\$60,229.50	Claim was filed after the General Bar Date of September 11, 2024
133	Lloyd, Amy	09/17/2024	3867	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
134	Loganathan, Piruthiviraj	10/29/2024	4129	\$80,357.00	Claim was filed after the General Bar Date of September 11, 2024
135	London, Robert	09/16/2024	3763	\$40,000.00	Claim was filed after the General Bar Date of September 11, 2024
136	Lopez, Julie	09/26/2024	3967	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
137	Lulic, Pablo	10/26/2024	4117	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
138	Lyjak, Craig	09/19/2024	3879	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
139	Ma, Jeffrey	09/12/2024	3730	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
140	Madathil, Anil Kumar Elambilan	10/05/2024	4029	\$78,030.18	Claim was filed after the General Bar Date of September 11, 2024
141	Maddern, Chris	10/04/2024	4027	\$1,376.53	Claim was filed after the General Bar Date of September 11, 2024
142	Maduff, Wendy	09/25/2024	3950	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
143	Makowiec, Rich	11/03/2024	4139	\$266.43	Claim was filed after the General Bar Date of September 11, 2024
144	Markwardt, Andrew	09/24/2024	3936	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
145	Martin, Andrea	10/29/2024	4132	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
146	Martin, Richard	09/26/2024	3962	\$70,000.00	Claim was filed after the General Bar Date of September 11, 2024
147	Martinez, Marcos M	09/16/2024	3812	\$71,998.02	Claim was filed after the General Bar Date of September 11, 2024
148	Maslennikov, Innokentiy	09/24/2024	3945	\$45,000.00	Claim was filed after the General Bar Date of September 11, 2024

149	Massetti, James	09/12/2024	3775	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
150	Mateo, David	09/19/2024	3878	\$92,125.64	Claim was filed after the General Bar Date of September 11, 2024
151	Mathis, Shauna	09/22/2024	3916	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
152	Maya, Joel	09/13/2024	3758	\$5,587.24	Claim was filed after the General Bar Date of September 11, 2024
153	McCormick, Patrick	10/16/2024	4064	\$1,000.00	Claim was filed after the General Bar Date of September 11, 2024
154	McCullough Hill PLLC	09/23/2024	3925	\$300.00	Claim was filed after the General Bar Date of September 11, 2024
155	McGregor, Eric Dennis	09/13/2024	3889	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
156	McNutt, Terri	09/17/2024	3860	\$79,000.00	Claim was filed after the General Bar Date of September 11, 2024
157	Melchor, Nasser	11/04/2024	4141	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
158	Melgardshagen, Stig	09/12/2024	3764	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
159	Merrell, David	09/27/2024	3971	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
160	Miller, Dave	09/20/2024	3891	\$20,225.00	Claim was filed after the General Bar Date of September 11, 2024
161	Milliner, Kevin	09/20/2024	3912	\$85,000.00	Claim was filed after the General Bar Date of September 11, 2024
162	Milliner, Kevin S	09/25/2024	3940	\$85,000.00	Claim was filed after the General Bar Date of September 11, 2024
163	Mishra, Sumit	09/19/2024	3893	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
164	Moeding, Jess	11/27/2024	4195	\$56,000.00	Claim was filed after the General Bar Date of September 11, 2024
165	Moore, Keith	09/13/2024	3836	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
166	Moore, Robert	02/24/2025	4251	\$19,368.00	Claim was filed after the General Bar Date of September 11, 2024
167	Moore, Robert L	11/02/2024	4138	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
168	Morales, Lois	09/26/2024	3958	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
169	Morali, Olivier	10/19/2024	4080	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
170	Moussa, Anthony	10/29/2024	4126	\$53,768.75	Claim was filed after the General Bar Date of September 11, 2024
171	Murphy, Brian	11/17/2024	4177	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
172	Murphy, Brian	11/17/2024	4176	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
173	Murray, Dana	09/13/2024	3768	\$50,000.00	Claim was filed after the General Bar Date of September 11, 2024
174	Nelson, Amanda	09/16/2024	3818	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
175	Newman, Eric	09/23/2024	3929	\$40,000.00	Claim was filed after the General Bar Date of September 11, 2024
176	Nguyen, Andrea	09/23/2024	3930	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
177	Nguyen, Kathy	09/16/2024	3810	\$1,000.00	Claim was filed after the General Bar Date of September 11, 2024
178	Nowicki, Jerzy	10/19/2024	4083	\$60,241.32	Claim was filed after the General Bar Date of September 11, 2024
179	Nunez, Keota A	09/25/2024	3952	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
180	Odolski, Larisa	09/19/2024	3885	\$40,611.00	Claim was filed after the General Bar Date of September 11, 2024
181	Odolski, Larisa	09/19/2024	3882	\$40,611.00	Claim was filed after the General Bar Date of September 11, 2024
182	Osler, Hoskin and Harcourt LLP	03/15/2025	4259	\$802.90	Claim was filed after the General Bar Date of September 11, 2024
183	Palayamkottai, Chokha	12/08/2024	4211	\$31,500.00	Claim was filed after the General Bar Date of September 11, 2024
184	Pape Material Handling, Inc	11/07/2024	4151	\$674.13	Claim was filed after the General Bar Date of September 11, 2024
185	Patapati, Kishore	09/13/2024	3770	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024

186	Patel Patel, Manoj	09/19/2024	3875	\$70,000.00	Claim was filed after the General Bar Date of September 11, 2024
187	Patel, Chirag	11/03/2024	4143	\$20,000.00	Claim was filed after the General Bar Date of September 11, 2024
188	Patel, Devindra	11/30/2024	4198	\$78,000.00	Claim was filed after the General Bar Date of September 11, 2024
189	Patel, Divya	09/16/2024	3856	\$76,000.00	Claim was filed after the General Bar Date of September 11, 2024
190	Patel, Madhavi	10/05/2024	4030	\$225.00	Claim was filed after the General Bar Date of September 11, 2024
191	Patel, Veeshal	09/14/2024	3794	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
192	Pedro, Joe	02/06/2025	4249	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
193	Pena, Ricardo	09/13/2024	3784	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
194	Perkins, Eric	09/14/2024	3772	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
195	Perzanowski, Matt	09/15/2024	3798	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
196	Peterika, Nicole	09/18/2024	3727	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
197	Peters, Mark	09/12/2024	3726	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
198	Peterson, Gene	01/01/2025	4228	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
199	Petrosyan, Lilit	10/18/2024	4073	\$350.00	Claim was filed after the General Bar Date of September 11, 2024
200	Pettitt, James	09/13/2024	3785	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
201	Pfaehler, John	10/24/2024	4114	\$1,000.00	Claim was filed after the General Bar Date of September 11, 2024
202	Pham, Lincoln	09/16/2024	3858	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
203	Philip, Philip M	10/19/2024	4084	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
204	Pickett, Mark	10/08/2024	4044	\$74,663.92	Claim was filed after the General Bar Date of September 11, 2024
205	Pillote, Cynthia	10/07/2024	4037	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
206	Prihoda, Carl	01/07/2025	4234	\$262.00	Claim was filed after the General Bar Date of September 11, 2024
207	Querido, David	09/16/2024	3809	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
208	Quinones, Rafael	11/14/2024	4168	\$71,687.00	Claim was filed after the General Bar Date of September 11, 2024
209	R, Derrick	09/13/2024	3771	\$20,000.00	Claim was filed after the General Bar Date of September 11, 2024
210	Rajendran, Gautham	11/17/2024	4180	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
211	Rapport, Joshua	04/26/2025	4266	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
212	Rashid, Muath	09/12/2024	3742	\$72,000.00	Claim was filed after the General Bar Date of September 11, 2024
213	Rat fur Formgebung Service GmbH	12/02/2024	4202	\$4,566.59	Claim was filed after the General Bar Date of September 11, 2024
214	Reigrut, Timothy	09/13/2024	3756	\$80,000.00	Claim was filed after the General Bar Date of September 11, 2024
215	RichGuzi, Rachel	10/03/2024	4004	\$110,500.00	Claim was filed after the General Bar Date of September 11, 2024
216	Rick Jackman	09/25/2024	3955	\$100.00	Claim was filed after the General Bar Date of September 11, 2024
217	Rijnmond Cleaning bv	10/16/2024	4065	(Euro) 1031.31	Claim was filed after the General Bar Date of September 11, 2024
218	Rinesmith, Roger	09/23/2024	3928	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
219	Rivera, Chanse	10/09/2024	4048	\$70,000.00	Claim was filed after the General Bar Date of September 11, 2024
220	Roan, Roger	10/04/2024	4021	\$78,441.18	Claim was filed after the General Bar Date of September 11, 2024
221	Roberts, Jason	09/16/2024	3846	\$85,000.00	Claim was filed after the General Bar Date of September 11, 2024
222	Robins, Shari	09/23/2024	3922	\$68,000.00	Claim was filed after the General Bar Date of September 11, 2024

223	Robinson, Garfield	12/31/2024	4227	\$750.00	Claim was filed after the General Bar Date of September 11, 2024
224	Rouge, Jorge A	09/16/2024	3745	\$5,250.00	Claim was filed after the General Bar Date of September 11, 2024
225	Rowlands, Mohan	12/13/2024	4213	\$40,000.00	Claim was filed after the General Bar Date of September 11, 2024
226	Rubien, Ira	10/21/2024	4098	\$45,250.00	Claim was filed after the General Bar Date of September 11, 2024
227	Rufner, Kevin	09/14/2024	3797	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
228	Ruiz, Miguel	09/27/2024	3970	\$20,000.00	Claim was filed after the General Bar Date of September 11, 2024
229	Saad, Mubashir	09/12/2024	3717	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
230	Sadis, Harvey J.	09/25/2024	3949	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
231	Saladini, Lynn	10/13/2024	4056	\$500.00	Claim was filed after the General Bar Date of September 11, 2024
232	Sands, Franklin	09/16/2024	3849	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
233	Santizo, Jose	09/19/2024	3874	\$59,900.00	Claim was filed after the General Bar Date of September 11, 2024
234	Sarabia, Santiago	10/10/2024	4059	\$257,285.25	Claim was filed after the General Bar Date of September 11, 2024
235	Schapiro, Robert M	09/17/2024	3825	\$38,700.00	Claim was filed after the General Bar Date of September 11, 2024
236	Schulte, Bryan	11/03/2024	4142	\$8,383.26	Claim was filed after the General Bar Date of September 11, 2024
237	Serra, Albert	09/25/2024	3941	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
238	Serwanski, Jaroslaw	10/23/2024	4111	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
239	Shanghai Xundao New Energy Technolo Co., Ltd	09/14/2024	3791	\$262,770.17	Claim was filed after the General Bar Date of September 11, 2024
240	Silva, Valdeci	10/21/2024	4089	\$1,100.00	Claim was filed after the General Bar Date of September 11, 2024
241	Silva, Wayne	10/04/2024	4011	\$79,814.00	Claim was filed after the General Bar Date of September 11, 2024
242	Sri Krishna Systems Inc Kishore Patapati	09/13/2024	3789	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
243	Starr, Alexandra	09/17/2024	3739	\$10,000.00	Claim was filed after the General Bar Date of September 11, 2024
244	Steele, Kenneth	03/04/2025	4255	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
245	Stephen A Watkins Trust	09/12/2024	3719	\$55,433.42	Claim was filed after the General Bar Date of September 11, 2024
246	Strattec Power Access LLC	10/30/2024	4130	\$84,000.00	Claim was filed after the General Bar Date of September 11, 2024
247	Tabatabaian, Rameen	09/13/2024	3778	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
248	Tan, Annelyn	09/12/2024	3709	\$58,808.46	Claim was filed after the General Bar Date of September 11, 2024
249	TandS Maintenance Co. LLC DBA Tetra Maintenance	10/03/2024	4005	\$2,068.00	Claim was filed after the General Bar Date of September 11, 2024
250	Taw, Kenneth	10/04/2024	4023	\$70,000.00	Claim was filed after the General Bar Date of September 11, 2024
251	Thai, Khuong	09/19/2024	3876	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
252	Thakkar, Bina	09/19/2024	3881	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
253	Thompson, Tiffany	09/13/2024	3781	\$2,500.00	Claim was filed after the General Bar Date of September 11, 2024
254	Tomuta, Bogdan	09/12/2024	3708	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
255	Tran, Danny	09/16/2024	3861	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024

256	Upadhyayula, Sharma	10/03/2024	4007	\$50,000.00	Claim was filed after the General Bar Date of September 11, 2024
257	Valderrabano, Miguel	09/15/2024	3787	\$53,000.00	Claim was filed after the General Bar Date of September 11, 2024
258	Van Sloten, Christine P	01/19/2025	4240	\$27,559.43	Claim was filed after the General Bar Date of September 11, 2024
259	Vector North America Inc.	10/01/2024	3991	\$491,844.02	Claim was filed after the General Bar Date of September 11, 2024
260	Vemuri, Sri Pavan	09/15/2024	3796	\$25,000.00	Claim was filed after the General Bar Date of September 11, 2024
261	Visone, Mario	09/13/2024	3835	\$30,000.00	Claim was filed after the General Bar Date of September 11, 2024
262	Vollbracht, Carlos	09/12/2024	3744	UNLIQUIDATED	Claim was filed after the General Bar Date of September 11, 2024
263	Wallace, Judith L	01/22/2025	4242	\$5,250.00	Claim was filed after the General Bar Date of September 11, 2024
264	Walters, Gregory	09/13/2024	3762	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
265	Wan, Ken	09/13/2024	3767	\$361,262.40	Claim was filed after the General Bar Date of September 11, 2024
266	Washington, DeAnna	01/21/2025	4241	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
267	Watkins, Stephen	09/12/2024	3721	\$5,088.08	Claim was filed after the General Bar Date of September 11, 2024
268	Wentland, Laci	10/07/2024	4038	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
269	Wieken, Peter	10/10/2024	4049	\$250.00	Claim was filed after the General Bar Date of September 11, 2024
270	Wilkins, Davis	09/23/2024	3927	\$69,312.94	Claim was filed after the General Bar Date of September 11, 2024
271	Williams, David	01/28/2025	4246	\$70,000.00	Claim was filed after the General Bar Date of September 11, 2024
272	Williams, David	04/08/2025	4263	\$8,490.32	Claim was filed after the General Bar Date of September 11, 2024
273	WilliamsMarston LLC	11/13/2024	4166	\$14,686.87	Claim was filed after the General Bar Date of September 11, 2024
274	Wong, Mankit	09/19/2024	3897	\$70,000.00	Claim was filed after the General Bar Date of September 11, 2024
275	Wong, Tim	09/13/2024	3840	\$20,000.00	Claim was filed after the General Bar Date of September 11, 2024
276	Woods, Anthony	09/24/2024	3939	\$32,500.00	Claim was filed after the General Bar Date of September 11, 2024
277	XiangYang NTN-YULON Drivetrain Co., Ltd.	09/24/2024	3942	\$265,520.92	Claim was filed after the General Bar Date of September 11, 2024
278	Ziebell, Christine	09/14/2024	3786	\$78,537.66	Claim was filed after the General Bar Date of September 11, 2024
279	Zuk, Jack A	11/04/2024	4144	\$1,900.00	Claim was filed after the General Bar Date of September 11, 2024
280	Zurich American Insurance Company	09/26/2024	3965	\$446.70	Claim was filed after the General Bar Date of September 11, 2024

Exhibit B

**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)

**DECLARATION OF RICK WRIGHT IN SUPPORT OF LIQUIDATING TRUSTEE'S
ELEVENTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) PURSUANT TO 11 U.S.C.
§ 502, FED. R. BANKR. P. 3007 AND LOCAL RULE 3007-1 TO CERTAIN LATE-FILED
CLAIMS**

I, Rick Wright, hereby declare under penalty of perjury:

1. I submit this declaration (the “**Declaration**”) in support of the *Liquidating Trustee’s Eleventh Omnibus Objection (Non-Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain Late-File Claims* (the “**Objection**”),² filed by Matthew Dundon, solely in his capacity as the Liquidating Trustee (the “**Liquidating Trustee**”) 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 Debtors’ day-to-day operations, businesses, financial affairs, and Books and Records. 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 register of claims (the “**Claims Register**”) prepared and provided by the Debtors’ (and the

¹ 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.

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

Liquidating Trust's) notice and claims agent, Kurtzman Carson Consultants dba Verita Global, 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. I have read the Objection, the Proposed Order, and **Schedule 1** attached to the Proposed Order, and I am familiar with the information contained therein. To the best of my knowledge and belief, and based on the information and records available to me, the assertions made in the Objection are accurate.

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 non-substantive grounds, i.e., the Late-Filed Claims.

5. Upon the review of the Proofs of Claim filed in these Chapter 11 Cases, I have identified the Late-Filed 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 Debtors' Books and Records, the Proofs of Claim, and all documentation submitted with the Proofs of Claim, each of the Claims listed on **Schedule 1** attached to the Proposed Order were filed after the applicable Bar Date and therefore constitute Late-Filed Claims that should each be disallowed in full and expunged.

6. Failure to disallow and expunge the Late-Filed Claims could result in the applicable claimants receiving an unwarranted and duplicate recovery if any such Claim(s) is ultimately allowed.

7. Moreover, disallowance of these Claims will enable the Liquidating Trust to maintain a Claims Register that more accurately reflects the Claims that exist against the Debtors. As such, I believe that disallowance and expungement of the Late-Filed Claims is appropriate.

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.

Dated: August 1, 2025

/s/ Rick Wright
Rick Wright