

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

ISKER. INC.. et al.

Debtors.

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

RE: Docket No. 1097

Claimant: Saman Ghaffari Garkani

Claim No.: 4077

Claim Amount: \$250.00

RESPONSE TO LIQUIDATING TRUSTEE'S OBJECTION TO CLAIM NO. 4077

I, Saman Ghaffari Garkani, respectfully submit this response to the Liquidating Trustee's Eleventh, Omnibus Objection (Non-Substantive) [D.I. 1097] which seeks to disallow and expunge my ~~Proof of~~ Claim No. 4077 on the basis that it was filed after the General Bar Date of September 11, 2024.

1. I did not receive proper and timely notice of the bankruptcy filing or bar date.
2. My first email from the claims agent, Verita Global, regarding this case was on September 12, 2024 — One day after the deadline had already passed.
3. I was then sent a follow-up email from Verita Global on October 18, 2024, which included my Personal Identification Number (PIN) necessary to log in and file a claim via the ePOC portal. That PIN email was the first time I had the ability to file my claim electronically.
4. I filed my claim on October 18, 2024 — the same day I received the PIN — demonstrating that I acted in good faith and without delay.
5. The delay in filing was caused entirely by lack of timely access and notice, not by negligence or disregard. Denying my claim under these circumstances would violate my due process rights under



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applicable bankruptcy law. See *In re TransWorld Airlines, Inc.*, 96 F.3d 687 (3d Cir. 1996).

6. I respectfully request that my claim be deemed timely and allowed, as my late filing was due to excusable neglect and the failure to receive notice and access before the bar date.

Supporting Documentation:

- Exhibit A: Email from Verita Global dated September 12, 2024 (received after the bar date).
- Exhibit B: Email from Verita Global dated October 18, 2024 (providing access to file claim).

Respectfully submitted,

Saman Ghaffari Garkani

15-2796 Moi St

Pahoa, HI 96778

(310) 855-4198

saman.garkani@gmail.com

Dated: 08/08/2025

9/2/25, 2:16 PM

Gmail - In re Fisker Inc., et al., Case No. 24-11390

mail

Saman G. Garkani <saman.garkani@gmail.com>

In re Fisker Inc., et al., Case No. 24-11390

1 message

Verita Fisker Noticing <fisker@e.veritanoticing.com>

Thu, Sep 12, 2024 at 3:05 PM

To: saman.garkani@gmail.com

[View this message in your browser](#)

Please find below a link to the following document recently filed in the bankruptcy proceedings of Fisker Inc., et al. Case No. 24-11390 (United States Bankruptcy Court, District of Delaware):

- Notice of Joint Hearing for Final Approval of the Disclosure Statement and Confirmation of the Plan [Docket No. 547]

For more information and copies of all pleadings, please visit the case website at www.veritaglobal.net/fisker

Do not reply to this email, as it was delivered from an unmonitored email account.

If saman.garkani@gmail.com should not be subscribed or if you need to change your subscription information for Verita/Fisker, please use this preferences page.

5/2/25, 2:14 PM

Gmail - Verita (KCC) ePOC PIN Request



Saman G. Garkani <saman.garkani@gmail.com>

Verita (KCC) ePOC PIN Request

1 message

noreply@veritaglobal.com <noreply@veritaglobal.com>

Fri, Oct 18, 2024 at 3:32 PM

To: saman.garkani@gmail.com

To saman.garkani@gmail.com:

Your Personal Identification Number (PIN) for you to file a claim against Fisker Inc., et al.. Your PIN is:

Aleddan5

This PIN will work with the saman.garkani@gmail.com email address you have provided to login to the ePOC system to create a claim.

If you have received this email in error, please contact us at (888) 926-3479.

Saman Chaffari Garkani
15-2796 Moi St.
Pahoa, HI 96778

HONOLULU HI 967

9 AUG 2025 PM 2 L 1775



Clerk of the court
U.S Bankruptcy Court for the District of Delaware
824 N. Market Street, 3rd Floor
Wilmington, DE 19801

Re: Case No. 24-11390 (TMH) - claim No. 4077

19801-302499

