

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)

**CERTIFICATION OF COUNSEL REGARDING PROPOSED
ORDER SCHEDULING OMNIBUS HEARING DATE**

The undersigned counsel to Matthew Dundon, solely in his capacity as the Liquidating Trustee (the “Liquidating Trustee”), hereby certifies the following:

1. Counsel for the Liquidating Trustee, through communication with the Chambers of The Honorable Thomas M. Horan, received an omnibus hearing date.
2. Attached hereto as **Exhibit A** is a proposed Order Scheduling Omnibus Hearing Date (the “Proposed Order”) that states with specificity the date and time of the omnibus hearing scheduled, subject to Court approval.
3. The Liquidating Trustee respectfully requests that the Proposed Order be entered at the earliest convenience of the Court.

[Remainder of Page Intentionally Left Blank]

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.



241139025111800000000001

Dated: November 18, 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*)
Rebecca Stark (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
rstark@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

Proposed Order

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

In re:

FISKER INC., *et al.*,

Debtors.

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

Re: Docket No. ____

ORDER SCHEDULING OMNIBUS HEARING DATE

Pursuant to Del. Bankr. L.R. 2002-1(a), IT IS HEREBY ORDERED that the following omnibus hearing is scheduled in the above-captioned cases:

DATE

January 29, 2026

TIME

10:00 a.m. (ET) (Courtroom No. 5)