

FISKER OCEAN

RECEIVED

2025 DEC 29 A 9:34

CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

Greg Moyer

S29W35691 Manor House Road

Oconomowoc, WI 53066

262-227-9695

gmmoyer@msn.com

RE: Liquidating Trustee's Fifteenth Omnibus Objection (Non Substantive) Pursuant To 11 U.S.C. 502, Fed.R. Bankr. P. 3007 And Local Rule 3007-1 To Certain No Liability Claims

Document Received:

12-19-25

Response deadline is 12-22-25. There is no possible way to turn this around and have a written response in hand at the Office of the Clerk of the United States Bankruptcy Court for the District of Delaware: 824 North Market Street, Wilmington, Delaware 19801.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

Chapter 11

Case No: 24-11390 (TMH)

Debtor: Fisker, Matthew Dundon "Liquidating Trustee" of the Fisker Liquidating Trust.

Title of the Objection: Objection to the Liquidating Trustee's Fifteenth Omnibus Objection (Non substantive) Pursuant to 11 U.S.C. 502 Fed. R. Bankr. P. 3007 And Local Rule 3007-1 To Certain No Liability Claims.



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Handwritten notes:
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1 prh

Name of Claimant: Greg Moyer Claimant #192 on page 13 of 18 within Schedule 1. Claim #26297148

Basis of the claim as previously stated. Auto manufacturer delivered defective auto with no value, Prior to fixing auto Fisker filed bankruptcy with no support, no manner in which to make the auto usable, thereby rendering the auto with no value to the claimant.

Objection to the "Liquidating Trustee's Fifteenth....No Liability claims"

The Trustee's fifteenth omnibus objection is specifically targeted at "No Liability Claims" and seeks to disallow them entirely because they are allegedly not reflected in the company's books and records or lack sufficient supporting documentation.

Legal arguments against this objection include:

- **Evidentiary Rebuttal:** Claimant argues they have provided sufficient documentation (e.g., invoices, agreements, correspondence) that provides prima facie evidence of the claim's validity, even if the Debtors' internal records are incomplete or inaccurate.
- **Procedural Due Process:** Objecting creditors might argue the omnibus objection process failed to meet specific procedural requirements under the Federal Rules of Bankruptcy Procedure (FRBP) Rule 3007 or relevant local rules, such as adequate notice or improper joinder of substantive and non-substantive claims.
- **Challenging the Books and Records:** creditor/claimant argues that the Trustee's reliance solely on the Debtors' books and records is flawed, potentially due to poor record-keeping during the company's financial distress, which should not invalidate otherwise legitimate claims.
- **Substantive Claim Validity:** The core of the argument is that the claim represents a valid and enforceable debt under applicable non-bankruptcy law, and the lack of matching entries in the Debtors' records should not be a sole basis for disallowance under 11 U.S.C. § 502(b)(1). Had Fisker remained in business the auto would have been either returned or repaired. Since neither occurred, the Claimant is entitled to compensation from the Liquidating Trust.
- **Fisker failed Claimant by not providing the actual and implied warranties of merchantability and fitness for a particular purpose (drivable vehicle) that may not be discharged in bankruptcy.**

Address, email and telephone for the claimant as above:

Greg Moyer

Greg Moyer
12/20/25
1:00 PM

S29W35691 Manor House Road

Oconomowoc, WI 53066

262-227-9695

gmmoyer@msn.com

August Mapp 12/30/25

Sent to:

1 pm

Justin R. Alberto(No 5126)

Melissa M Hartlipp (No 7063)

Jason C DiBattista

Bridgette G. McGrath

Rebecca Stark

Marianna Udem

Matthew Dundon

Gregory M. Moyer

S29W35691 Manor House Road

Oconomowoc, WI 53066

262-227-9695

gmmoyer@msn.com

Dear Office of the Clerk of the United States Bankruptcy Court for the District of Delaware,

I received the Liquidating Trustee's Fifteenth Omnibus Objection on December 19, 2025. I opened it on December 20, 2025. I crafted my response and then attempted to file it online with the you.

I was directed through your system to email it to veritanoticing@veritaglobal.com as per your webpage instructions. (see enclosed screenshot, enclosure A). I followed though and sent the response to the email.

I received an email response (enclosure B) stating that they did not allow me to file via email and directs me back to filing with you. It has a link to the original Objection which errors out (enclosure C).

With the arrival date of 12-19-25, and reading it a number of times to understand its contents, on 12-20-25, there is no way physically possible for me to turn this around and write a response, run it past my atty and have it sent to you. US Mail overnight is not a guarantee and can take 2-3 days.

I apologize for the delay.

Thank you,

Greg Moyer

A handwritten signature in black ink, appearing to read "Greg Moyer", is written over the typed name.

United States Bankruptcy Court District of Delaware

This case or an associated case has a claims agent. File all claims with the agent shown below.
If none is shown, please contact the debtor's attorney to file a claim.

Kurtzman Carson Consultants, LLC dba Verita Global
222 N. Pacific Coast Highway
Suite 300

El Segundo, CA 90245

Email: veritanoticing@veritaglobal.com

To Try Again Click Here

A



B,

RE: Fisker Objection to the Liquidating Trustee's Fifteenth...Claims

From Christopher Estes <cestes@veritaglobal.com>
Date Mon 12/22/2025 1:12 PM
To gmmoyer@msn.com <gmmoyer@msn.com>
Cc INA Verita Call_Center <Verita_Call_Center@veritaglobal.com>

Hello,

Verita Global is the claims and notification agent in the **Fisker Inc., et al.** (Case Number: 24-11390) Chapter 11 bankruptcy case. **We are not attorneys and do not offer legal advice nor do we interpret legal documentation.**

- Verita is prohibited from accepting claims or claim related materials via email.

Refer to the procedures to **Response to Omnibus Objections** beginning on page 9 of the Objection (linked below) that include Responses must be filed with the Office of the Clerk of the United States Bankruptcy Court.

- <http://portal.kccllc.com//Documents/ViewableDocs/2411390/241139025120100000000001.PDF> [DN 1185]

Unfortunately, Veritas Global is not qualified or permitted to interpret these documents so if you need additional guidance, you should seek the assistance of your attorney or financial advisor.

Best,

Christopher Estes
Senior RSS Consultant
Corporate Restructuring
cestes@veritaglobal.com

Verita
[veritaglobal.com]veritaglobal.com

KCC is now Verita. Please note updated contact information.

From: Greg Moyer <gmmoyer@msn.com>
Sent: Saturday, December 20, 2025 10:21 AM
To: Verita Noticing <veritanoticing@veritaglobal.com>
Subject: Fisker Objection to the Liquidating Trustee's Fifteenth...Claims

You don't often get email from gmmoyer@msn.com. [Learn why this is important](#)
Please see attached Objection to the Attempt to remove me from my claim.
I received the document 12-19-25 and read it this am and do not have time to mail the response and therefore sent copies of all attys listed on the document as well as Mr. Dundon.

I tried to file my objection with the Clerk of Court of the US bankruptcy for the District of Delaware, but the system booked me out stating that you were the Claims Agent. Please let me know that I have the right place. I tried to add to my claim on your website but the old pin doesn't work from when I originated my claim and a new pin was sent but it wants me to file a new claim.

I am confused. So here goes

B2

FISKER OCEAN

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Chapter 11

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Name of Claimant: Greg Moyer Claimant #192 on page 13 of 18 within Schedule 1. Claim #26297148

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B₃

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Sent to:

Justin R. Alberto(No 5126)

Melissa M Hartlipp (No 7063)

Jason C DiBattista

Bridgette G. McGrath

Rebecca Stark

Marianna Udem

Matthew Dundon

8:33

◀ Mail



Error 1016



Ray ID: 9b2474ab3d5ccd80 •

2025-12-23 02:33:42 UTC

Origin DNS error

What happened?

You've requested a page on a website (portal.kccllc.com) that is on the Cloudflare network. Cloudflare is currently unable to resolve your requested domain (portal.kccllc.com).

Please see

<https://developers.cloudflare.com/support/troubleshooting/status-codes/cloudflare-1xxx-errors/error-1016/> for more details.

What can I do?

If you are a visitor of this website:

Please try again in a few minutes.

If you are the owner of this website:





IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

ISKER, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

Hearing Date: January 29, 2026 at 10:00 a.m. (ET)

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

LIQUIDATING TRUSTEE'S FIFTEENTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) PURSUANT TO 11 U.S.C. § 502, FED. R. BANKR. P. 3007 AND LOCAL RULE 3007-1 TO CERTAIN NO LIABILITY CLAIMS

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

Matthew Dundon, solely in his capacity as the Liquidating Trustee (the "Liquidating Trustee") of the Fisker Liquidating Trust (the "Liquidating Trust"), hereby submits this fifteenth omnibus objection (non-substantive) (the "Objection") seeking entry of an order (the "Proposed Order"), substantially in the form annexed hereto as Exhibit A, pursuant to, *inter alia*, 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 Claims² listed on Schedule 1 to the Proposed Order for which the Debtors' estates have no liability (the "No Liability Claims"), according to the Debtors'

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 herein but not otherwise defined shall have the meaning ascribed to it in the Plan (as defined below).

