

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: March 31, 2026 at 10:00 a.m.
(ET)

Objection Deadline: March 18, 2026 at 4:00
p.m. (ET)

**LIQUIDATING TRUSTEE’S SEVENTEENTH OMNIBUS OBJECTION (NON-
SUBSTANTIVE) PURSUANT TO 11 U.S.C. § 502, FED. R. BANKR. P. 3007 AND
LOCAL RULE 3007-1 TO CERTAIN EQUITY 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 seventeenth omnibus objection (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 each Claim² identified on **Schedule 1** to the Proposed Order because each such Claim is based upon ownership of equity security interests and/or stock in 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 Plan (as defined below).



Debtors (the “**Equity Claims**” or the “**Disputed Claims**”). In support of the Objection, the Liquidating Trustee submits the Declaration of Rick Wright (the “**Wright Declaration**,” a copy of which is attached hereto as **Exhibit B** and incorporated by reference herein), and respectively represents as follows:

JURISDICTION, VENUE AND STATUTORY BASES

1. The United States District Court for the District of Delaware has jurisdiction over this Objection 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.³

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.

³ 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].

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 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. Prepetition Claims 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 “**Governmental Bar Date**”) as the deadline for governmental units to file Proofs of Claim.

14. On August 21, 2024, the Liquidating Trust’s (and formerly, the Debtors’) claims and noticing agent, Kurtzman Carson Consultants, LLC dba Verita Global 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 at their last known address on file, 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 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].

15. The Notice of Bar Dates provided 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.

See Notice of Bar Dates.

C. Administrative Claims Bar Date

16. The Plan provided that holders of Administrative Claims 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 Claims Bar Date**" and, together with the General Bar Date and the Governmental Bar Date, the "**Bar Dates**"). *See* Plan, Articles I.A.15, V.A.1.

17. The Confirmation Order further provided that "[e]xcept as otherwise provided in the Plan or this Order, requests for payment of Administrative Claims must be filed no later than the Administrative Claims Bar Date in accordance with the Plan." *See* Confirmation Order ¶ 101.

18. Consequently, all applicable Bar Dates have passed.

C. Claims and Interest Objection Deadline

19. Pursuant to the *Order Further Extending the Time Period Within Which the Liquidating Trustee May File and Serve Objections to Claims and Interests* [D.I. 1228], the deadline for the Liquidating Trustee to object to any and all Claims and Interests, including but

not limited to prepetition Claims and Interests and Administrative Claims, is August 17, 2026, subject to the Liquidating Trustee's right to seek additional extensions.

D. Claims Objection Procedures

20. 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].

21. Most notably, the Claims Objection Procedures provide the Liquidating Trustee with relief from certain of the requirements of the Local Rules to permit (but not require) the Liquidating Trustee to exceed certain Claim objections limits and to file substantive omnibus Claim objections raising common legal issues to multiple Claims, among other things. *See id.*

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 numerous omnibus objections to Claims and/or Interests. *See* D.I. 888, 889, 890, 910, 930, 956, 976, 977, 1054, 1055, 1097, 1131, 1171, 1173, 1185, 1212.

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.

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 Equity Claims.⁴ *See* Wright Declaration ¶ 4.

RELIEF REQUESTED

28. By this Objection and for the reasons described more fully herein, the Liquidating Trustee objects to the Disputed 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 Equity Claims.

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

⁴ 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 Disputed Claims on any basis if applicable.

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” and “are interests, not claims.” *See* Fed. R. Bankr. P. 3007(d)(2)(D) and (G).

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).

34. 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: ... (v) Stockholder claim based on stock ownership, but not a stockholder claim for damages.” *See* Del. Bankr. L.R. 3007-1(c)(v).

35. For the reasons set forth below, there is ample evidence to rebut the *prima facie* validity of each of the Disputed Claims.

A. Equity Claims

36. The Equity Claims identified on **Schedule 1** to the Proposed Order were filed by claimants asserting rights to a distribution in the Chapter 11 Cases based upon ownership of Equity Interests and/or stocks in the Debtors. *See* Wright Declaration ¶ 6.

37. An equity interest in a debtor, such as stock, is not considered a “claim” under the Bankruptcy Code. *See* 11 U.S.C. § 101(5)(A) (defining a “claim” as a “right to payment” or a “right to an equitable remedy for a breach of performance”); *see also In re Insilco Techs., Inc.*, 480 F.3d 212, 218 (3d Cir. 2007) (“[An equity interest] is not a claim at all”); *In re Hedged-Invs. Assocs.*, 84 F.3d 1267, 1272 (10th Cir. 1996) (“Simply put, an equity interest is not a claim against the debtor... .”) (quotations omitted).

38. Moreover, consistent with Local Rule 3007-1(c)(v), none of the Equity Claims listed on **Schedule 1** to the Proposed Order that assert ownership of Equity Interests allege damages associated therewith. *See* Wright Declaration ¶ 6.

39. Further, pursuant to the Plan, all Class 6 equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and are not entitled to receive a recovery under the Plan. *See* Plan, Article VI.B.6.

40. The allowance of such Equity Claims would unjustifiably elevate the position of equity security holders to that of creditors, to the detriment of legitimate creditors in the Chapter 11 Cases. *See* Wright Declaration ¶ 9.

41. Accordingly, the Liquidating Trustee objects to the Equity Claims, and requests entry of the Proposed Order disallowing in full and expunging the Equity Claims as set forth on **Schedule 1** to the Proposed Order. *See* Wright Declaration ¶ 10.

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 **March 18, 2026 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 undersigned counsel, 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 and e-mail (if available) 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 or 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 enter the Proposed Order attached hereto as **Exhibit A**: (i) disallowing in full and expunging the Equity Claims; and (ii) granting such other and further relief as is just and proper.

Dated: February 25, 2026
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 L. 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

**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: March 31, 2026 at 10:00 a.m.
(ET)**

**Objection Deadline: March 18, 2026 at 4:00
p.m. (ET)**

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

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

PLEASE TAKE NOTICE, that on February 25, 2026, Matthew Dundon, solely in his capacity as the Liquidating Trustee (the "**Liquidating Trustee**") of the Fisker Liquidating Trust, filed the *Liquidating Trustee's Seventeenth Omnibus Objection (Non-Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain Equity 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 **March 18, 2026 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 **March 31, 2026 at 10:00 a.m. (ET)** (the "**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.

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.

Dated: February 25, 2026
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 L. 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

**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 SEVENTEENTH OMNIBUS
OBJECTION (NON-SUBSTANTIVE) PURSUANT TO 11 U.S.C. § 502, FED. R. BANKR.
P. 3007 AND LOCAL RULE 3007-1 TO CERTAIN EQUITY CLAIMS**

THIS MATTER having come before the Court² upon the *Liquidating Trustee's Seventeenth Omnibus Objection (Non-Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain Equity Claims* (the "**Objection**"), filed by Matthew Dundon, solely in his capacity as the Liquidating Trustee (the "**Liquidating Trustee**") of the Fisker Liquidating Trust (the "**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 Equity Claims listed on **Schedule 1** attached hereto for the reasons set forth in the Objection; 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

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

need be given; and the Court having considered the Objection, the Equity Claims listed on **Schedule 1** 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 an Equity 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 schedule of Equity Claims, and the notice of Objection.

C. Any entity known to have an interest in the Equity 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 Equity Claims listed on **Schedule 1** hereto is hereby disallowed in full and expunged for all purposes.

4. The Liquidating Trustee's rights to further object at a later date and on any basis to the Equity Claims, 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 Equity Claims or any other Claims (filed or not) which may be asserted against the Debtors and/or the Liquidating Trust, are fully 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

Row	Claim #	Claimant	Asserted Total Claim Amount	Asserted Priority	Reasons for Disallowance
1	2353	Abraham, Bobby	\$144,690.11	General Unsecured	Claimant lists "Fisker bankruptcy" as the basis of the Claim in Box 8 of the applicable Proof of Claim form, and further notes "Fisker stocks" in Box 11. Claim No. 2353 does not attach any supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
2	3135	Adcock, Marvin	\$700,000.00	General Unsecured	Claimant lists "Stock/Automobile" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 3135 does not attach any supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
3	2598	Ali, Aras	\$151,000.00	General Unsecured	Claimant lists "goods sold and stock purchased" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 2598 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

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4	2304	Ambrozic, Ivo	\$170,000.00	General Unsecured	Claimant lists "stocks" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 2304 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
5	4061	Askew, Sean M	\$71,953.15	General Unsecured	Claimant lists "Investment money lost to bad management" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 4061 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
6	1530	Avila, Yasin	\$169,930.16	General Unsecured	Claimant lists "Common stock holder" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 1530 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

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7	3117	Bauer, Patrizius	\$14,828.00	General Unsecured	Claimant lists "Loss of Money with 6000pcs of A2P9A3/US33813J1060" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 3117 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
8	3609	Bily, Andrew J.	\$455,418.57	General Unsecured	Claimant lists "Claim of interest in 570,343 Shares of Class A Fisker Common Stock" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 3609 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full. Moreover, Claim No. 3609 is duplicative of Claim No. 3566 and should be disallowed in full on that separate basis as well.
9	3566	Bily, Andrew J.	\$455,418.57	General Unsecured	Claimant lists "Claim of interest in 570,343 Shares of Class A Fisker Common Stock" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 3566 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

Row	Claim #	Claimant	Asserted Total Claim Amount	Asserted Priority	Reasons for Disallowance
10	3264	Blue Bridge Trust Company Inc TR Nobile trust	\$166,607.03	General Unsecured	Claimant lists "convertible promissory note which has been converted in 21,999 class A common shares on July 19th, 2020" as the basis of the Claim on the applicable Proof of Claim form. Claim No. 3264 attaches a convertible note purchasing agreement and other business records and emails as supporting documentation, all of which demonstrate that the Claim is based upon ownership of Fisker common shares. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full. Moreover, Claim No. 3264 is duplicative of Claim No. 3257 and should be disallowed in full on that separate basis as well.
11	3257	Blue Bridge Trust Company Inc TR Nobile trust	\$166,607.03	General Unsecured	Claimant lists "convertible promissory note which has been converted in 21,999 class A common shares on July 19th, 2020" as the basis of the Claim on the applicable Proof of Claim form. Claim No. 3257 attaches no supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

Row	Claim #	Claimant	Asserted Total Claim Amount	Asserted Priority	Reasons for Disallowance
12	2819	Boldt, Axel	\$82,000.00	General Unsecured	Claimant lists "Shares" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 2819 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
13	4268	Caybot, Jessie	\$8,000.00	General Unsecured	Claimant lists "just received noted, and just file the claim" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 4268 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full. Additionally, the Claim was filed after the General Bar Date of September 11, 2024, and therefore should be disallowed in full as a late-filed Claim, to the extent necessary.
14	1504	Cemelli, Jeff	\$285,000.00	General Unsecured	Claimant lists "Stock owned" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 1504 does not attach any supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

Row	Claim #	Claimant	Asserted Total Claim Amount	Asserted Priority	Reasons for Disallowance
15	2475	Davila, Jorge Lobo	\$59,473.89	General Unsecured	Claimant lists "Loss in stock Investment due to Company management" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 2475 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
16	2192	Delavie, Daniel	\$23,593.71	General Unsecured	Claimant lists "Shareholder" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 2192 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
17	4218	Dunne, James Kevin	\$24,019.00	General Unsecured	Claimant lists "Shareholder loss" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 4218 attaches no supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

Row	Claim #	Claimant	Asserted Total Claim Amount	Asserted Priority	Reasons for Disallowance
18	2032	Dykstra, Kristi	\$25,224.43	General Unsecured	Claimant lists "Stock purchase" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 2032 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
19	2219	Fakiris, Pantelis	\$24,229.00	General Unsecured	Claimant lists "Investment loss due to malfeasance" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 2219 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
20	2955	Gebhart, Christa	\$31,756.65	General Unsecured	Claimant lists "Purchaseed Fisker Stock which has become worthless" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 2955 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

Row	Claim #	Claimant	Asserted Total Claim Amount	Asserted Priority	Reasons for Disallowance
21	2842	Gebhart, Christa	\$31,130.00	General Unsecured	Claimant lists "Stock Account with Schwab" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 2842 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full. Additionally, the Claim appears to have been amended and superseded by Claim No. 2955 and should be also be disallowed in full on that basis.
22	607	Gilliam, Charles David	\$137,458.82	General Unsecured	Claimant lists "Goods sold and money loaned" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 607 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
23	3898	Goodin, John P	\$16,368.00	General Unsecured	Claimant lists "stock purchase" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 3898 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

Row	Claim #	Claimant	Asserted Total Claim Amount	Asserted Priority	Reasons for Disallowance
24	2225	Graziano, Daniel	\$10,092.07	General Unsecured	Claimant lists "Investment loss due to malfeasance" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 2225 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
25	1041	Hansen, Christopher	\$7,766.00	General Unsecured	Claimant lists "Stock Purchase" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 1041 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
26	1769	Heurlin, Chase	\$22,000.00	General Unsecured	Claimant lists "Stock holder" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 1769 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

Row	Claim #	Claimant	Asserted Total Claim Amount	Asserted Priority	Reasons for Disallowance
27	3213	Hoghooghi, Aexander	\$10,886.80	General Unsecured	Claimant lists "Equity interests" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 3213 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
28	2316	Indus GmbH	\$52,211.00	General Unsecured	Claimant lists "shares" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 2316 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
29	4289	Kaljund, Mati	\$23,002.35	General Unsecured	Claimant lists "Stock purchase - Fisker Inc. common shares" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 4289 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

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30	1563	Kloss, Alexander	\$13,971.56	General Unsecured	Claimant lists "Kauf von Fisker-Aktien" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 1563 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
31	208	La Rosa, Manuele	\$55,562.43	General Unsecured	Claimant lists "Shareholder" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 208 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
32	1014	Liang, Frank	\$900,000.00	General Unsecured	Claimant lists "Purchasing stocks" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 1014 does not attach any supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

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33	4146	Malcolm, Laura	\$15,811.55	General Unsecured	Claimant lists "Money loaned" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 4146 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
34	3910	Methvin, Marc Andrew	\$13,039.48	General Unsecured	Claimant lists "General unsecured" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 3910 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
35	1074	Milanski, John	\$30,000.00	General Unsecured	Claimant lists "Stockholder" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 1074 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

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36	3675	Miller, Stephen	\$14,540.00	General Unsecured	Claimant lists "bankruptcy" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 3675 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
37	4018	Moran-Cassese Steve	\$7,156.00	General Unsecured	Claimant lists "Fisker Stock Investment/Shares" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 4018 attaches no supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full. Additionally, the Claim was filed after the General Bar Date of September 11, 2024, and therefore should be disallowed in full as a late-filed Claim, to the extent necessary.
38	1418	Norbakhsh, Moe	\$190,000.00	General Unsecured	Claimant lists "money lost" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 1418 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

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39	996	Patel, Hardik	\$61,499.00	General Unsecured	Claimant lists "10000 - Stocks" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 996 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
40	2317	Penny Leal IRA	\$19,992.42	General Unsecured	Claimant lists "Stock Purchase" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 2317 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
41	404	Per Lars Jacobsen Childs Trust UTD The Solveig Bogg Jacobsen Insurance Trust 12/26/1996	\$10,770.00	General Unsecured	Claimant lists "Investment in class A common stock" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 404 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

Row	Claim #	Claimant	Asserted Total Claim Amount	Asserted Priority	Reasons for Disallowance
42	3938	Petrino, Nicholas	\$9,160.00	General Unsecured	Claimant lists "Stock purchased" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 3938 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full. Additionally, the Claim was filed after the General Bar Date of September 11, 2024, and therefore should be disallowed in full as a late-filed Claim, to the extent necessary.
43	3914	Pflum, Jeffrey	\$12,128.50	General Unsecured	Claimant lists "Stock purchased" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 3914 attaches no supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full. Additionally, the Claim was filed after the General Bar Date of September 11, 2024, and therefore should be disallowed in full as a late-filed Claim, to the extent necessary.

Row	Claim #	Claimant	Asserted Total Claim Amount	Asserted Priority	Reasons for Disallowance
44	4232	Pirasteh, Yashar	\$8,086.50	General Unsecured	Claimant lists "Stock shareholder" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 4232 attaches no supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full. Additionally, the Claim was filed after the General Bar Date of September 11, 2024, and therefore should be disallowed in full as a late-filed Claim, to the extent necessary.
45	2857	Schwartz, Matthew	\$89,285.18	General Unsecured	Claimant lists "Remaining value of shares" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 2857 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
46	1026	Sen, Anup	\$17,554.99	General Unsecured	Claimant lists "3100 Fisker equities - FSR now FSRNQ" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 1026 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

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47	1098	Shukla, Sandeep	\$13,265.95	General Unsecured	Claimant lists "Fisker Shares purchased on 3/29/2022" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 1098 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
48	691	Silva-Bruniany, Delia	\$66,563.98	General Unsecured	Claimant lists "Investment money lost to bad management" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 691 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
49	2736	Spitzer, Benjamin	\$39,939.35	General Unsecured	Claimant lists "Lost value of stock owned at time of bankruptcy" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 2736 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

Row	Claim #	Claimant	Asserted Total Claim Amount	Asserted Priority	Reasons for Disallowance
50	2731	Spitzer, Richard	\$50,392.78	General Unsecured	Claimant lists "Lost value of stock owned at time of bankruptcy" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 2731 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
51	2727	Thompson, Carmen C	\$9,000.00	General Unsecured	Claimant lists "Stock purchased" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 2727 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
52	3905	Traar, Marcel	\$22,749.06	General Unsecured	Claimant lists "Insolvency proceedings" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 3905 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

Row	Claim #	Claimant	Asserted Total Claim Amount	Asserted Priority	Reasons for Disallowance
53	1728	Tratz, Jochen	\$16,157.00	General Unsecured	Claimant lists "Namensaktien" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 1728 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
54	1135	Vidaurri, Alejandro	\$118,000.00	General Unsecured	Claimant lists "Bought shares of common stock" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 1135 does not attach any supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
55	143	Wang, Justin	\$34,478.36	General Unsecured	Claimant lists "Stocks" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 143 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

Row	Claim #	Claimant	Asserted Total Claim Amount	Asserted Priority	Reasons for Disallowance
56	2187	Weis, Jerry	\$305,593.60	General Unsecured	Claimant lists "misled by company statements and filings" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 2187 attaches investment account records as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
57	4178	Xinnian, Wen	\$325,000.00	General Unsecured	Claimant lists "The costs I bought the stocks" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 4178 attaches investment account records and a copy of a Chinese passport as supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

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
SEVENTEENTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) PURSUANT TO 11
U.S.C. § 502, FED. R. BANKR. P. 3007 AND LOCAL RULE 3007-1 TO CERTAIN
EQUITY CLAIMS**

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

1. I submit this declaration (the “**Declaration**”) in support of the *Liquidating Trustee’s Seventeenth Omnibus Objection (Non-Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain Equity 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. 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.

4. During the Claims reconciliation process, the Reviewing Parties have conducted, and continue to conduct, a review of the Proofs of Claim 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 and identified certain Disputed Claims that are objectionable on non-substantive grounds, i.e., the Equity Claims.

5. 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 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 represent Disputed Claims that should be disallowed in full and expunged.

A. Equity Claims

6. To the best of my knowledge, information and belief, and based on the information and the Books and Records available to me, each of the Equity Claims identified on **Schedule 1**

to the Proposed Order are based upon ownership of shareholder/equity interests and do not allege damages associated therewith.

7. Each of the Equity Claims identified on **Schedule 1** to the Proposed Order therefore do not constitute “claims” against any of the Debtors’ estates within the meaning of section 101(5) of the Bankruptcy Code.

8. Further, pursuant to the Plan, all Class 6 equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and are not entitled to a recovery under the Plan.

9. To the best of my knowledge and belief, and based on the information and Books and Records available to me, if the Equity Claims are not disallowed and expunged, the potential exists for the applicable claimants to receive recoveries to which they are not entitled, to the detriment of other stakeholders.

10. Accordingly, I believe that the Court should grant the relief requested in the Objection with respect to the Equity Claims.

D. Conclusion

11. 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: February 25, 2026

/s/ Rick Wright
Rick Wright