

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
FISKER INC., <i>et al.</i> , ¹	Case No. 24-11390 (TMH)
Debtors.	(Jointly Administered)

**AMENDED² NOTICE OF AGENDA FOR HEARING SCHEDULED FOR
JULY 16, 2024, AT 11:00 A.M. (EASTERN TIME)**

This hearing will be conducted in-person.³ All parties, including witnesses, are expected to attend in person unless permitted to appear via Zoom.

Participation at the in-person Court proceeding using Zoom is allowed only in the following circumstances: (i) counsel for a party or a pro se litigant files a responsive pleading and intends to make only a limited argument; (ii) a party or a representative of a party is interested in observing the hearing; (iii) a party is proceeding in a claims allowance dispute on a pro se basis; (iv) an individual has a good faith health-related reason to participate remotely and has obtained permission from chambers to do so; or (v) other extenuating circumstances that warrant remote participation as may be determined by the Court.

To attend a hearing remotely, please register using the eCourtAppearance tool ([available here](#)) or on the Court's website at <http://www.deb.uscourts.gov>.

The deadline to register for remote attendance is 4:00 p.m. (ET) the business day before the hearing unless otherwise noticed.

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.

² Amended items appear in bold.

³ This hearing will be held before the Honorable Judge Brendan L. Shannon at the United States Bankruptcy Court for the District of Delaware, 824 market street, 6th floor, Courtroom 1, Wilmington, Delaware 19801.



ADJOURNED MATTERS

1. Motion of Debtors for Entry of Interim and Final Orders (I) Waiving the Requirement to File a List of Equity Security Holders and (II) Authorizing Debtors to Redact Certain Personal Information ([D.I. 6](#), filed 6/20/24).

Objection Deadline: July 9, 2024, at 4:00 p.m. (ET); extended to July 11, 2024, at 5:00 p.m. (ET) for the U.S. Trustee; **extended to July 17, 2024, at 11:59 p.m. (ET) for the Official Committee of Unsecured Creditors (the “Committee”).**

Responses Received:

- a) Informal comments received from the U.S. Trustee.
- b) Informal comments received from the Committee.

Related Documents:

- a) Interim Order (I) Waiving the Requirement to File a List of Equity Security Holders and (II) Authorizing Debtors to Redact Certain Personal Information ([D.I. 75](#), entered 6/26/24).
- b) Second Omnibus Notice of First Day Motions and Final Hearing Thereon ([D.I. 83](#), filed 6/26/24).

Status: This matter has been adjourned to the hearing scheduled for July 29, 2024, at 10:00 a.m. (ET).

2. Motion of Debtors for Entry of Interim and Final Orders (I) Establishing Notification and Hearing Procedures for, and Approving Restrictions on, Certain Transfers of and Declarations of Worthlessness with Respect to Interests in and Certain Claims Against the Debtors’ Estates and (II) Establishing a Record Date for Notice and Sell-Down Procedures for Trading in Claims Against the Debtors’ Estates ([D.I. 7](#), filed 6/20/24).

Objection Deadline: July 9, 2024, at 4:00 p.m. (ET); extended to July 11, 2024, at 5:00 p.m. (ET) for the U.S. Trustee; **extended to July 17, 2024, at 11:59 p.m. (ET) for the Committee.**

Responses Received:

- a) Informal comments received from the U.S. Trustee.
- b) Informal comments received from the Committee.

Related Documents:

- a) Interim Order Establishing Notification and Hearing Procedures for, and Approving Restrictions on, Certain Transfers of and Declarations of Worthlessness with Respect to Interests in and Certain Claims Against the Debtors' Estates ([D.I. 64](#), entered 6/24/24).
- b) Omnibus Notice of First Day Motions and Final Hearing Thereon ([D.I. 73](#), filed 6/25/24).

Status: This matter has been adjourned to the hearing scheduled for July 29, 2024, at 10:00 a.m. (ET).

- 3. Motion of Debtors for Entry of Interim and Final Orders Authorizing (I) Debtors to Continue and Renew Their Liability, Property, Casualty, Surety Bond, and Other Insurance Programs, and Honor All Obligations in Respect Thereof and (II) Financial Institutions to Honor and Process Related Checks and Transfers ([D.I. 8](#), filed 6/20/24).

Objection Deadline: July 9, 2024, at 4:00 p.m. (ET); extended to July 11, 2024, at 5:00 p.m. (ET) for the U.S. Trustee; **extended to July 17, 2024, at 11:59 p.m. (ET) for the Committee.**

Responses Received:

- a) Limited Omnibus Objection of CVI Investments, Inc. to Certain of the Debtors' First Day Motions ([D.I. 182](#), filed 7/9/24).
- b) Informal comments received from the Committee.

Related Documents:

- a) Interim Order Authorizing (I) Debtors to Continue and Renew Their Liability, Property, Casualty, Surety Bond, and Other Insurance Programs, and Honor All Obligations in Respect Thereof and (II) Financial Institutions to Honor and Process Related Checks and Transfers ([D.I. 61](#), entered 6/24/24).
- b) Omnibus Notice of First Day Motions and Final Hearing Thereon ([D.I. 73](#), filed 6/25/24).

Status: This matter has been adjourned to the hearing scheduled for July 29, 2024, at 10:00 a.m. (ET).

4. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing (A) Debtors to Continue to Maintain Existing Cash Management System, Bank Accounts, and Business Forms, (B) Debtors to Open and Close Bank Accounts, and (C) Financial Institutions to Administer the Bank Accounts and Honor and Process Related Checks and Transfers, and (II) Waiving Deposit and Investment Requirements ([D.I. 9](#), filed 6/20/24).

Objection Deadline: July 10, 2024, at 4:00 p.m. (ET); extended to July 11, 2024, at 5:00 p.m. (ET) for the U.S. Trustee; **extended to July 17, 2024, at 11:59 p.m. (ET) for the Committee.**

Responses Received:

- a) Informal comments received from the U.S. Trustee.

Related Documents:

- a) Interim Order (I) Authorizing (A) Debtors to Continue to Maintain Existing Cash Management System, Bank Accounts, and Business Forms, (B) Debtors to Open and Close Bank Accounts, and (C) Financial Institutions to Administer the Bank Accounts and Honor and Process Related Checks and Transfers, and (II) Waiving Deposit and Investment Requirements ([D.I. 76](#), entered 6/26/24).
- b) Second Omnibus Notice of First Day Motions and Final Hearing Thereon ([D.I. 83](#), filed 6/26/24).

Status: This matter has been adjourned to the hearing scheduled for July 29, 2024, at 10:00 a.m. (ET).

5. Motion of Debtors for Entry of Interim and Final Orders (I) Prohibiting Utilities From Altering, Refusing, or Discontinuing Service, (II) Deeming Utilities Adequately Assured of Future Performance, and (III) Establishing Procedures for Determining Requests for Additional Adequate Assurance ([D.I. 10](#), filed 6/20/24).

Objection Deadline: July 9, 2024, at 4:00 p.m. (ET); extended to July 11, 2024, at 5:00 p.m. (ET) for the U.S. Trustee; **extended to July 17, 2024, at 11:59 p.m. (ET) for the Committee.**

Responses Received:

- a) Limited Omnibus Objection of CVI Investments, Inc. to Certain of the Debtors' First Day Motions ([D.I. 182](#), filed 7/9/24).
- b) Informal comments received from the Committee.

Related Documents:

- a) Interim Order (I) Prohibiting Utilities From Altering, Refusing, or Discontinuing Service, (II) Deeming Utilities Adequately Assured of Future Performance, and (III) Establishing Procedures for Determining Requests for Additional Adequate Assurance ([D.I. 62](#), filed 6/24/24).
- b) Omnibus Notice of First Day Motions and Final Hearing Thereon ([D.I. 73](#), filed 6/25/24).

Status: This matter has been adjourned to the hearing scheduled for July 29, 2024, at 10:00 a.m. (ET).

- 6. Motion of Debtors for Entry of Interim and Final Orders Authorizing (I) Debtors to Pay Certain Prepetition Taxes, Governmental Assessments, and Fees and (II) Financial Institutions to Honor and Process Related Checks and Transfers ([D.I. 11](#), filed 6/20/24).

Objection Deadline: July 9, 2024, at 4:00 p.m. (ET); extended to July 11, 2024, at 5:00 p.m. (ET) for the U.S. Trustee; **extended to July 17, 2024, at 11:59 p.m. (ET) for the Committee.**

Responses Received:

- a) Limited Omnibus Objection of CVI Investments, Inc. to Certain of the Debtors' First Day Motions ([D.I. 182](#), filed 7/9/24).
- b) Informal comments received from the Committee.

Related Documents:

- a) Interim Order Authorizing (I) Debtors to Pay Certain Prepetition Taxes, Governmental Assessments, and Fees and (II) Financial Institutions to Honor and Process Related Checks and Transfers ([D.I. 60](#), entered 6/24/24).
- b) Omnibus Notice of First Day Motions and Final Hearing Thereon ([D.I. 73](#), filed 6/25/24).

Status: This matter has been adjourned to the hearing scheduled for July 29, 2024, at 10:00 a.m. (ET).

7. Motion of Debtors for Entry of Interim and Final Orders Authorizing (I) Debtors to (A) Pay Prepetition Employee Obligations and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Current and Former Employees to Proceed with Outstanding Workers' Compensation Claims, and (III) Financial Institutions to Honor and Process Related Checks and Transfers ([D.I. 12](#), filed 6/20/24).

Objection Deadline: July 9, 2024, at 4:00 p.m. (ET); extended to July 11, 2024, at 5:00 p.m. (ET) for the U.S. Trustee; **extended to July 17, 2024, at 11:59 p.m. (ET) for the Committee.**

Responses Received:

- a) Limited Omnibus Objection of CVI Investments, Inc. to Certain of the Debtors' First Day Motions ([D.I. 182](#), filed 7/9/24).
- b) Informal comments received from the U.S. Trustee.
- c) Informal comments received from the Committee.

Related Documents:

- a) Interim Order Authorizing (I) Debtors to (A) Pay Prepetition Employee Obligations and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Current and Former Employees to Proceed with Outstanding Workers' Compensation Claims, and (III) Financial Institutions to Honor and Process Related Checks and Transfers ([D.I. 52](#), filed 6/21/24).
- b) Omnibus Notice of First Day Motions and Final Hearing Thereon ([D.I. 73](#), filed 6/25/24).

Status: This matter has been adjourned to the hearing scheduled for July 29, 2024, at 10:00 a.m. (ET).

8. Motion of Debtors for Entry of an Order (I) Authorizing Debtors to Reject Certain Unexpired Leases of Nonresidential Real Property and (II) Authorizing and Establishing Procedures to Reject Executory Contracts and Unexpired Leases ([D.I. 13](#), filed 6/20/24).

Objection Deadline: July 10, 2024, at 4:00 p.m. (ET); **extended to July 17, 2024, at 11:59 p.m. (ET) for the Committee.**

Responses Received:

- a) Limited Objection by Landlord to Debtors' Motion for Entry of an Order (I) Authorizing Debtors to Reject Certain Unexpired Leases of Nonresidential Real Property and (II) Authorizing and Establishing Procedures to Reject Executory Contracts and Unexpired Leases ([D.I. 185](#), filed 7/10/24).

b) The Grove, LLC's Limited Objection to Debtors' Motion to Reject Lease ([D.I. 191](#), filed 7/10/24).

c) **Informal comments received from Continental Rosecran.**

Related Documents:

a) Notice of Motion and Hearing ([D.I. 82](#), filed 6/26/24).

Status: The Grove, LLC's objection is resolved subject to the Debtors filing a revised proposed form of order removing The Grove, LLC from the list of rejected contracts, which the Debtors intend to do in advance of the hearing. This matter has been adjourned to the hearing scheduled for July 29, 2024, at 10:00 a.m. (ET).

9. Motion of Debtors for Entry of an Order Extending Time to File (I) Schedules of Assets and Liabilities, (II) Schedules of Current Income and Expenditures, (III) Schedules of Executory Contracts and Unexpired Leases, (IV) Statements of Financial Affairs, and (V) Bankruptcy Rule 2015.3 Financial Reports ([D.I. 104](#), filed 7/1/24).

Objection Deadline: July 9, 2024, at 4:00 p.m. (ET); extended to July 17, 2024, at 11:59 p.m. (ET) for the Committee.

Responses Received:

a) Informal comments received from the Committee.

Related Documents: None at this time.

Status: This matter has been adjourned to the hearing scheduled for July 29, 2024, at 10:00 a.m. (ET).

10. Motion of Debtors for Entry of an Order Approving Procedures for the Retention and Compensation of Ordinary Course Professionals *Nunc Pro Tunc* to the Petition Date ([D.I. 87](#), filed 6/26/24).

Objection Deadline: July 10, 2024, at 4:00 p.m. (ET); extended to July 12, 2024, at 5:00 p.m. (ET) for the U.S. Trustee; extended to July 17, 2024, at 11:59 p.m. (ET) for the Committee.

Responses Received:

a) Limited Omnibus Objection of CVI Investments, Inc. to Certain of the Debtors' First Day Motions ([D.I. 182](#), filed 7/9/24).

b) Informal comments received from the U.S. Trustee.

Related Documents: None.

Status: This matter has been adjourned to the hearing scheduled for July 29, 2024, at 10:00 a.m. (ET).

11. Motion of Debtors for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals ([D.I. 105](#), filed 7/1/24).

Objection Deadline: July 9, 2024, at 4:00 p.m. (ET); extended to July 12, 2024, at 5:00 p.m. (ET) for the U.S. Trustee; **extended to July 17, 2024, at 11:59 p.m. (ET) for the Committee.**

Responses Received:

- a) Limited Omnibus Objection of CVI Investments, Inc. to Certain of the Debtors' First Day Motions ([D.I. 182](#), filed 7/9/24).
- b) Informal comments received from the U.S. Trustee.

Related Documents: None at this time.

Status: This matter has been adjourned to the hearing scheduled for July 29, 2024, at 10:00 a.m. (ET).

MATTERS GOING FORWARD

12. Motion of the Debtors for Entry of Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Waiving Any Stay of the Effectiveness of the Relief Granted, (V) Granting Related Relief ([D.I. 38](#), filed 6/21/24).

Objection Deadline: July 12, 2024, at 5:00 p.m. (ET); extended to July 14, 2024, at 11:59 p.m. (ET) for the Committee.

Responses Received:

- a) United States Trustee's Objection and Reservation of Rights with Respect to Debtors' Third Interim Cash Collateral Order ([D.I. 162](#), filed 7/8/24).
- b) Limited Objection and Reservation of Rights of the Official Committee of Unsecured Creditors to the Debtors' Proposed Third Interim Cash Collateral Order ([D.I. 168](#), filed 7/9/24).

Related Documents:

- a) Notice of Filing of Cash Collateral Budget ([D.I. 49](#), filed 6/21/24).
- b) Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Scheduling a Further Hearing on the Motion, and (V) Granting Related Relief ([D.I. 59](#), entered 6/24/24).
- c) Second Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Scheduling a Further Hearing on the Motion, and (V) Granting Related Relief ([D.I. 98](#), entered 6/28/24).
- d) Notice of Hearing on Motion of the Debtors for Entry of Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Waiving Any Stay of the Effectiveness of the Relief Granted, (V) Granting Related Relief ([D.I. 100](#), filed 6/28/24).
- e) Notice of Filing of Cash Collateral Budget ([D.I. 142](#), filed 7/6/24).
- f) Notice of Filing of Third Interim Cash Collateral Budget and Cash Collateral Budget Variance Report (From June 18, 2024 to July 5, 2024) ([D.I. 170](#), filed 7/9/24).
- g) Third Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection (III) Modifying the Automatic Stay, (IV) Scheduling a Further Hearing on the Motion, and (V) Granting Related Relief ([D.I. 184](#), entered 7/10/24).
- h) Notice of Hearing on the Motion of the Debtors for Entry of Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Waiving Any Stay of the Effectiveness of the Relief Granted, (V) Granting Related Relief ([D.I. 195](#), filed 7/11/24).
- i) **Notice of Filing of Proposed Fourth Interim Cash Collateral Order ([D.I. 204](#), filed 7/14/2024).**
- j) **Notice of Filing of Cash Collateral Budget ([D.I. 205](#), filed 7/14/2024).**

Status: **This matter is going forward on an interim basis.**

13. Application of Debtors for Authority To Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor to the Debtors *Nunc Pro Tunc* to the Petition Date ([D.I. 71](#), filed 6/25/24).

Objection Deadline: July 9, 2024, at 4:00 p.m. (ET); extended to July 14, 2024, at 11:59 p.m. (ET) for the Committee.

Responses Received:

- a) Limited Omnibus Objection of CVI Investments, Inc. to Certain of the Debtors' First Day Motions ([D.I. 182](#), filed 7/9/24).

Related Documents: None.

Status: This matter is going forward.

14. Application of Debtors for Authority to Employ and Retain Morris, Nichols, Arsht & Tunnell LLP as Bankruptcy Counsel for the Debtors *Nunc Pro Tunc* to the Petition Date ([D.I. 72](#), filed 6/25/24).

Objection Deadline: July 9, 2024, at 4:00 p.m. (ET); extended to July 11, 2024, at 5:00 p.m. (ET) for the U.S. Trustee; extended to July 14, 2024, at 11:59 p.m. (ET) for the Committee.

Responses Received:

- a) Informal comments received from the U.S. Trustee.

Related Documents:

- a) Supplemental Declaration of Robert J. Dehney, Sr. in Support of the Application of Debtors for Authority to Employ and Retain Morris, Nichols, Arsht & Tunnell LLP as Bankruptcy Counsel for the Debtors *Nunc Pro Tunc* to the Petition Date ([D.I. 181](#), filed 7/9/24).
- b) **Second Supplemental Declaration of Robert J. Dehney, Sr. in Support of the Application of Debtors for Authority to Employ and Retain Morris, Nichols, Arsht & Tunnell LLP as Bankruptcy Counsel for the Debtors *Nunc Pro Tunc* to the Petition Date ([D.I. 218](#), filed 7/15/24).**
- c) **Order Granting Application of Debtors for Authority to Employ and Retain Morris, Nichols, Arsht & Tunnell LLP as Bankruptcy Counsel for the Debtors *Nunc Pro Tunc* to the Petition Date ([D.I. 232](#), filed 7/15/24).**

Status: An order has been entered with respect to this matter. A hearing on this matter is not necessary.

15. Application of Debtors for Authority to Employ and Retain Davis Polk & Wardwell LLP as Attorneys for the Debtors *Nunc Pro Tunc* to the Petition Date ([D.I. 74](#), filed 6/25/24).

Objection Deadline: July 9, 2024, at 4:00 p.m. (ET); extended to July 11, 2024, at 5:00 p.m. (ET) for the U.S. Trustee; extended to July 14, 2024, at 11:59 p.m. (ET) for the Committee.

Responses Received:

- a) Informal comments received from the U.S. Trustee.

Related Documents:

- a) **Supplemental Declaration of Brian M. Resnick in Support of the Application of Debtors for Authority to Employ and Retain Davis Polk & Wardwell LLP as Attorneys for the Debtors *Nunc Pro Tunc* to the Petition Date ([D.I. 212](#), filed 7/15/24).**
- b) **Order Approving Application of Debtors of Authority to Employ and Retain Davis Polk & Wardwell LLP as Attorneys for the Debtors *Nunc Pro Tunc* to the Petition Date ([D.I. 216](#), entered 7/15/24).**

Status: **An order has been entered with respect to this matter. A hearing on this matter is not necessary.**

16. Application of Debtors for Entry of an Order (I) Authorizing the Debtors to (A) Employ and Retain Huron Consulting Services, LLC, and (B) Designate John C. DiDonato as Chief Restructuring Officer for the Debtors Effective as of the Petition Date; and (II) Granting Related Relief ([D.I. 89](#), filed 6/26/24).

Objection Deadline: July 10, 2024, at 4:00 p.m. (ET); extended to July 11, 2024, at 5:00 p.m. (ET) for the U.S. Trustee; extended to July 14, 2024, at 11:59 p.m. (ET) for the Committee.

Responses Received:

- a) Informal comments received from the U.S. Trustee.

Related Documents:

- a) **Certification of Counsel Regarding Order Granting Application of Debtors for Entry of an Order (I) Authorizing the Debtors to (A) Employ and Retain Huron Consulting Services, LLC, and (B) Designate John C. DiDonato as Chief Restructuring Officer for the Debtors Effective as of the Petition Date; and (II) Granting Related Relief ([D.I. 222](#), filed 7/15/24).**

Status: On July 15, 2024, the Debtors filed a Certification of Counsel with respect to this matter. Accordingly, a hearing on this matter is not necessary unless the Court directs otherwise.

17. Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Certain of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrance, and Interests, (II) Authorizing the Debtors to Enter into and Perform Under the Fleet Sales Agreement, and (III) Granting Related Relief ([D.I. 110](#), filed 7/2/24).

Objection Deadline: July 11, 2024, at 5:00 p.m. (ET); extended to July 12, 2024, at 5:00 p.m. (ET) for Fisker GmbH; extended to July 14, 2024, at 11:59 p.m. (ET) for the Committee.

Responses Received:

- a) Objection to the Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Certain of the Debtors Assets Free and Clear of Liens, Claims, Encumbrances, and Interests, (II) Authorizing the Debtors to Enter Into and Perform Under the Fleet Sales Agreement, and (III) Granting Related Relief ([D.I. 193](#), filed 7/11/2024).
- b) Preliminary Objection and Reservation of Rights of Ideal Motors to Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Certain of the Debtors Assets Free and Clear of Liens, Claims, Encumbrances, and Interests, (II) Authorizing the Debtors to Enter Into and Perform Under the Fleet Sales Agreement, and (III) Granting Related Relief ([D.I. 194](#), filed 7/11/2024).
- c) **Reservation of Rights of the Official Committee of Unsecured Creditors to the Motion of Debtors for Entry of an Order Approving Fleet Sales Agreement ([D.I. 203](#), filed 7/14/2024).**

Related Documents:

- a) Declaration of John C. DiDonato as Chief Restructuring Officer of the Debtors in Support of Debtors' Chapter 11 Proceedings and First Day Pleadings ([D.I. 37](#), filed 6/21/24).
- b) Motion of the Debtors for Entry of Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Scheduling a Further Hearing on the Motion, (V) Granting Related Relief ([D.I. 38](#), filed 6/21/24).
- c) Second Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay,

(IV) Scheduling a Further Hearing on the Motion, and (V) Granting Related Relief ([D.I. 98](#), entered 6/28/24).

- d) Declaration of John C. DiDonato as Chief Restructuring Officer of the Debtors in Support of the Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Certain of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrance, and Interests, (II) Authorizing the Debtors to Enter into and Perform Under the Fleet Sales Agreement, and (III) Granting Related Relief ([D.I. 111](#), filed 7/2/24).
- e) Certificate of Service ([D.I. 117](#), filed 7/3/24).
- f) Order Shortening Notice of Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Certain of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrance, and Interests, (II) Authorizing the Debtors to Enter into and Perform Under the Fleet Sales Agreement, and (III) Granting Related Relief ([D.I. 126](#), entered 7/4/24).
- g) Notice of Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Certain of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrance, and Interests, (II) Authorizing the Debtors to Enter into and Perform Under the Fleet Sales Agreement, and (III) Granting Related Relief ([D.I. 128](#), filed 7/5/24).
- h) Supplemental Certificate of Service ([D.I. 148](#), filed 7/7/24).
- i) Supplemental Declaration of John C. DiDonato as Chief Restructuring Officer of the Debtors in Support of the Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Certain of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances, and Interests, (II) Authorizing the Debtors to Enter Into and Perform Under the Fleet Sales Agreement, and (III) Granting Related Relief ([D.I. 171](#), filed 7/9/24).
- j) Third Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection (III) Modifying the Automatic Stay, (IV) Scheduling a Further Hearing on the Motion, and (V) Granting Related Relief ([D.I. 184](#), entered 7/10/24).
- k) Amended Notice of Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Certain of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances, and Interests, (II) Authorizing the Debtors to Enter Into and Perform Under the Fleet Sales Agreement, and (III) Granting Related Relief ([D.I. 186](#), filed 7/10/24).

- l) Conditional Statement of Support by Fisker Owners Association to Debtors' Motion for Entry of an Order (I) Authorizing and Approving the Sale of Certain of the Debtors Assets Free and Clear of Liens, Claims, Encumbrances, and Interests, (II) Authorizing the Debtors to Enter Into and Perform Under the Fleet Sales Agreement, and (III) Granting Related Relief ([D.I. 210](#), filed 7/15/24).**
- m) Supplemental Declaration of John C. DiDonato as Chief Restructuring Officer of the Debtors in Further Support of the Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Certain of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances, and Interests, (II) Authorizing the Debtors to Enter into and Perform Under the Fleet Sales Agreement, and (III) Granting Related Relief ([D.I. 225](#), filed 7/15/24).**
- n) Debtors' Omnibus Reply to Objections and in Further Support of the Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Sale of Certain of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances, and Interests, (II) Authorizing the Debtors to Enter into and Perform Under the Fleet Sales Agreement, and (III) Granting Related Relief ([D.I. 227](#), filed 7/15/24).**
- o) Notice of Filing of Proposed Fleet Sale Order ([D.I. 228](#), filed 7/15/24).**

Status: This matter is going forward.

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Dated: July 16, 2024
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Sophie Rogers Churchill

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-and-

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