

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

In re:

Fisker Inc., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF ALL NOTICES AND DOCUMENTS**

PLEASE TAKE NOTICE that McDermott Will & Emery LLP hereby enters its appearance (this “Notice of Appearance”) in the above-captioned cases as counsel to the Fisker Liquidating Trust, pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “Bankruptcy Code”), and Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). McDermott Will & Emery LLP hereby requests that copies of any and all notices and papers filed or entered in these cases be given to and served upon the following:

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PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code and Bankruptcy Rules 2002, 3017(a), 9007, and 9010, this request includes not only the notices and papers referred to in the Bankruptcy Rules, but also includes, without limitation, any notice, motion, proposed order, application, petition, pleading, request,

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 Dr, La Palma, CA 90623.



complaint, demand, memorandum, affidavit, declaration, presentment, order to show cause, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile, electronically, or otherwise, that is filed or given in connection with the above-captioned cases.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any prior or later appearance, pleading, or claim waives (i) any right to have final orders in non-core matters arising in or related to the above-captioned chapter 11 cases entered only after *de novo* review by a district court judge; (ii) any right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases; (iii) any right to have a district court judge withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) an election of remedies; or (v) any other substantive or procedural right.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance is without prejudice to any other rights, claims, actions, defenses, setoffs, or recoupments under agreement, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments against a debtor or any other entity either in these cases or in any other action are expressly reserved.

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Dated: October 23, 2024
Wilmington, Delaware

MCDERMOTT WILL AND EMERY LLP

/s/ Maris J. Kandestin

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