

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

In re:	Chapter 11
FISKER INC., <i>et al.</i> ,	Case No. 24-11390 (TMH)
Debtors. ¹	(Jointly Administered)
	Obj. Deadline: November 8, 2024 at 4:00 p.m. (ET)

**SUMMARY OF THIRD MONTHLY FEE APPLICATION OF
MORRISON & FOERSTER LLP AS COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF FISKER INC., *ET AL.*, FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

Name of Applicant	Morrison & Foerster LLP
Authorized to provide professional services to:	The Official Committee of Unsecured Creditors of Fisker Inc., <i>et al.</i> (the " <u>Committee</u> ")
Date of retention order:	August 6, 2024, effective as of July 3, 2024
Period for which compensation and reimbursement sought:	September 1, 2024 through September 30, 2024
Compensation sought as actual, reasonable, and necessary:	\$275,243.00 (80% of \$344,053.75)
Expense reimbursement sought as actual, reasonable, and necessary:	\$2,202.68
This is a(n):	<input checked="" type="checkbox"/> monthly <input type="checkbox"/> interim <input type="checkbox"/> final

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.



**Summary of Hours by Professional Billed from
September 1, 2024 through September 30, 2024**

Name	Position with Applicant	Year Admitted or No. of Years with Firm	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
Partners and Of Counsel						
Butterfield, Benjamin	Partner	2014	Bankruptcy Restructuring & Insolvency Group ²	\$1,400.00	66.10	\$92,540.00
Lawrence, J. Alexander	Partner	2000	Litigation	\$1,600.00	0.90	\$1,440.00
Mannal, Doug	Partner	2001	BRIG	\$1,875.00	71.00	\$133,125.00
Schaaf, Kathleen E.	Senior Of Counsel	1978	BRIG	\$1,625.00	6.80	\$11,050.00
Sturgeon, Dave B.	Partner	2010	Tax	\$1,500.00	1.50	\$2,250.00
Associates						
Jaworskyj, Philip S.	Associate	2015	Tax	\$1,295.00	4.10	\$5,309.50
Murphy, Joseph	Associate	2023	BRIG	\$995.00	5.60	\$5,572.00
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Yan, Donghao (Helen)	Associate	2023	BRIG	\$925.00	36.10	\$33,392.50
Paraprofessionals						
Coffey, Cameron Tower	Paralegal	3 months	Corporate	\$370.00	8.70	\$3,219.00
Guido, Laura	Senior Paralegal	16 ¾ years	BRIG	\$500.00	5.10	\$2,550.00
Total Incurred:					263.8	\$358,086.00
Less Client Accommodation for Non-Working Travel (50% of Fees Incurred):					n/a	\$(5,943.75)
Less Client Accommodation for Time Entry Review (100% of Fees Incurred):					n/a	\$(8,088.50)
Total Requested:					263.8	\$344,053.75

This monthly application seeks payment of approximately 12.60 hours with a value of approximately \$13,247.00 incurred in connection with the preparation of fee applications.

² Hereinafter referred to as "BRIG."

Total Partners, Of Counsel, Associates, and Paraprofessionals³

Professionals	Blended Rates	Total Hours Billed	Total Compensation
Partners and Of Counsel	\$1,596.20	146.3	\$233,523.75
Associates	\$1,010.23	103.7	\$104,761.00
Total Incurred by Attorneys:	\$1,353.14	250.0	\$338,284.75
Paraprofessionals	\$418.04	13.8	\$5,769.00
Total Requested (Attorneys and Paraprofessionals):	\$1,304.22	263.8	\$344,053.75

Compensation by Project Category from September 1, 2024 through September 30, 2024

Project Category Number	Matter Description	Hours	Total Fees Requested
002	Asset Disposition	1.50	\$2,742.00
003	Assumption and Rejection of Leases and Contracts	0.30	\$351.00
005	Budgeting (Case)	0.80	\$838.00
006	Business Operations	0.20	\$234.00
007	Case Administration	20.10	\$19,727.50
008	Claims Administration and Objections	5.30	\$7,657.50
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013	Financing and Cash Collateral	0.50	\$487.00
015	Meetings and Communications with Creditors	25.20	\$32,584.50
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017	Plan and Disclosure Statement	142.20	\$206,410.00
021	Tax	6.70	\$8,846.50
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³ The aggregate blended rates charged by Morrison & Foerster during the Compensation Period take into account the client accommodation for non-working travel (50% of such fees incurred are written off) and time entry review (100% of such fees are written off).

Expense Summary

Description	Billed Amount
Delivery Fees	\$34.04
Travel	\$759.90
Travel Meals	\$21.90
Search Fees	\$80.57
On-line Research - WESTLAW	\$256.20
On-line Research - OTHER DATABASE	\$109.24
Epiq eDiscovery Managed Services	\$940.83
Total	\$2,202.68

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FOR THE DISTRICT OF DELAWARE**

In re:

FISKER INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

Obj. Deadline: November 8, 2024 at 4:00 p.m. (ET)

**THIRD MONTHLY FEE APPLICATION OF MORRISON & FOERSTER LLP AS
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
FISKER INC., *ET AL.*, FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM SEPTEMBER 1, 2024
THROUGH SEPTEMBER 30, 2024**

Morrison & Foerster LLP (“Morrison & Foerster”), counsel to the Official Committee of Unsecured Creditors (the “Committee”) of Fisker Inc., *et al.* (the “Debtors”) hereby submits its monthly fee application (the “Monthly Fee Application”) pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.*, as amended (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 350] (the “Interim Compensation Order”), and the *Order Authorizing the Employment and Retention of Morrison & Foerster LLP as Counsel to the Official Committee of Unsecured Creditors of Fisker Inc.* *et al.* *Effective as of July 3, 2024* [Docket No. 383] (the “Retention Order”) for allowance of

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.

compensation for services rendered in the amount of \$344,053.75 and reimbursement of expenses in the amount \$2,202.68 for the period from September 1, 2024 through September 30, 2024 (the “Compensation Period”). In support of its Monthly Fee Application, Morrison & Foerster respectfully represents as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction to consider the Monthly Fee Application pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b), and the Committee confirms their consent pursuant to Local Rule 9013-1(f) to the entry of a final order by this Court in connection with this Monthly Fee Application to the extent that it is later determined that this Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-2.

BACKGROUND

A. The Chapter 11 Cases

5. On June 17 and 19, 2024 (collectively, the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with this Court (the “Chapter 11 Cases”). Since the Petition Date, the Debtors have remained in possession of their assets and have continued to operate and manage their businesses as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. On July 2, 2024, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed the Committee pursuant to Section 1102 of the Bankruptcy Code. *See Notice of Appointment of Committee of Unsecured Creditors* [Docket No. 106]. The Committee consists of the following seven (7) members: (i) U.S. Bank Trust National Association; (ii) Avnet, Inc.; (iii) Magna International, Inc.; (iv) Keyframe Capital Partners, L.P.; (v) T-Mobile US, Inc.; (vi) Cristian Fleming; and (vii) Mouri Tech LLC. The Committee selected Avnet, Inc. and Keyframe Capital Partners, L.P. as its co-chairs (the “Co-Chairs”).

7. On July 3, 2024, the Committee conducted its initial meeting and selected Morrison & Foerster as its lead counsel. On July 4, 2024, the Committee selected Cole Schotz P.C. (“Cole Schotz”) as its Delaware counsel. On July 5, 2024, the Committee selected M3 Partners, LP (“M3”) as its financial advisor in these Chapter 11 Cases.

B. The Retention of Morrison & Foerster

6. On July 19, 2024, the Committee filed the *Application of the Official Committee of Unsecured Creditors of Fisker Inc., et al., for Entry of an Order Authorizing the Employment and Retention of Morrison & Foerster LLP as Counsel Effective as of July 3, 2024* [Docket No. 256] (the “Application”). On August 6, 2024, the Court entered the Retention Order.

7. Pursuant to the Retention Order, Morrison & Foerster was employed to represent the Committee as bankruptcy counsel in connection with these chapter 11 cases, effective as of July 3, 2024. The Retention Order authorized Morrison & Foerster to be compensated for professional services rendered and reimbursed for expenses incurred in connection with these chapter 11 cases.

8. All services for which compensation is requested by Morrison & Foerster were performed on behalf of the Committee. All expenses for which reimbursement is requested were

incurred on behalf of the Committee and were actual and necessary to the performance of Morrison & Foerster's services.

C. The Interim Compensation Order

9. On July 1, 2024, the Debtors filed the *Motion of the Debtors for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 105] (the "Interim Compensation Motion"), and on July 31, 2024, the Court entered the Interim Compensation Order.

10. The Interim Compensation Order sets forth the procedures for interim compensation and reimbursement of expenses in these chapter 11 cases. Specifically, the Interim Compensation Order provides that a Professional (as defined in the Interim Compensation Motion) may file and serve a Monthly Fee Application (as defined in the Interim Compensation Order) no earlier than the second (2nd) day of each calendar month following the month for which compensation is sought. Provided that no objections to the Monthly Fee Application are filed on or before the fourteenth (14th) day after service of a Monthly Fee Application, the Professional may file a certificate of no objection with the Court, after which the Debtors are authorized to pay such Professional eighty percent (80%) of the fees and one hundred percent (100%) of the expenses requested in the applicable Monthly Fee Application that are not subject to an objection. In addition, the Interim Compensation Order provides that a Professional may submit a consolidated Monthly Fee Application that includes a request for compensation earned or expenses incurred during previous months.

RELIEF REQUESTED

11. During the Compensation Period, Morrison & Foerster incurred \$344,053.75 in fees for services provided to the Committee relating to these chapter 11 cases. Pursuant to this Monthly Fee Application, Morrison & Foerster seeks (a) allowance of compensation for services

rendered in the amount of \$344,053.75 and (b) payment in the total amount of \$275,243.00 representing 80% of the total fees (\$275,243.00) billed and reimbursement for 100% of the expenses (\$2,202.68) incurred during the Compensation Period.

A. Itemization of Compensation Requested

12. Attached hereto as **Exhibit A** is a detailed itemization, by subject matter category, of all services performed by Morrison & Foerster attorneys and paraprofessionals with respect to these chapter 11 cases during the Compensation Period.

13. A schedule providing certain information regarding the Morrison & Foerster attorneys and paraprofessionals for whose work on these chapter 11 cases compensation is sought in this Monthly Fee Application is attached hereto as **Exhibit B**. Attorneys and paraprofessionals of Morrison & Foerster have expended a total of 263.80 hours in connection with these chapter 11 cases during the Compensation Period.

14. Morrison & Foerster incurred \$2,202.68 of expenses during the Compensation Period. A schedule detailing the specific disbursements is attached hereto as **Exhibit C**. Morrison & Foerster submits that the expenses requested were actual and necessary to the performance of Morrison & Foerster's services.

15. Morrison & Foerster's time detail and records of fees incurred during the Compensation Period are attached hereto as **Exhibit D**. This detailed itemization complies with Local Rule 2016-2(d) in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of the activity, all time is billed in increments of one-tenth of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified.

VALUATION OF SERVICES

16. The rates charged by Morrison & Foerster for these services are its normal hourly rates of compensation for work of this nature. The reasonable value of the services rendered by Morrison & Foerster for the Compensation Period as counsel to the Committee in these chapter 11 cases is \$358,086.00.

17. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is reasonable and necessary given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

REPRESENTATIONS

18. Although every effort has been made to include all fees and expenses incurred by Morrison & Foerster attorneys and paraprofessionals during the Compensation Period, some fees and expenses might not be included in this Monthly Fee Application due to delays caused in connection with accounting and processing of such time and expenses. Accordingly, Morrison & Foerster reserves the right to make further applications to this Court for allowance of such fees and expenses incurred during the Compensation Period, but not included herein.

[Continued on next page]

WHEREFORE, Morrison & Foerster hereby requests pursuant to the procedures allowed in the Interim Compensation Order: (a) interim allowance of compensation for necessary and valuable professional services rendered to the Committee in the amount of \$344,053.75 and reimbursement of reasonable and necessary expenses in the amount of \$2,202.68 for the period from September 1, 2024 through September 30, 2024; (b) payment in the total amount of \$277,445.68 (representing 80% of the total fees (\$275,243.00) billed and 100% of the expenses (\$2,202.68) incurred during the Compensation Period); and (c) such other relief as this Court deems just and proper.

Dated: October 25, 2024

/s/ Doug Mannal

Doug Mannal

MORRISON & FOERSTER LLP

Lorenzo Marinuzzi, Esq. (admitted *pro hac vice*)

Doug Mannal, Esq. (admitted *pro hac vice*)

Benjamin Butterfield, Esq. (admitted *pro hac vice*)

Miranda K. Russell, Esq. (admitted *pro hac vice*)

Darren Smolarski, Esq. (admitted *pro hac vice*)

Donghao (Helen) Yan, Esq. (admitted *pro hac vice*)

250 West 55th Street

New York, New York 10019-9601

Telephone: (212) 468-8000

Facsimile: (212) 468-7900

Email: lmarinuzzi@mofocom

dmannal@mofocom

bbutterfield@mofocom

mrussell@mofocom

dsmolarski@mofocom

hyan@mofocom

Co-Counsel for the Official Committee of Unsecured Creditors

**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)

Obj. Deadline: November 8, 2024 at 4:00 p.m. (ET)

**NOTICE OF THIRD MONTHLY FEE APPLICATION OF
MORRISON & FOERSTER LLP AS COUNSEL TO THE OFFICIAL COMMITTEE OF
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COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

PLEASE TAKE NOTICE that on October 25, 2024, Morrison & Foerster LLP (“Morrison & Foerster”), filed the *Third Monthly Fee Application of Morrison & Foerster LLP as Counsel to the Official Committee of Unsecured Creditors of Fisker Inc., et al., for Allowance of Compensation and Reimbursement of Expenses for the Period from September 1, 2024 through September 30, 2024* (the “Monthly Fee Application”) seeking compensation for services rendered and reimbursement of expenses incurred as counsel to the Official Committee of Unsecured Creditors (the “Committee”) of Fisker Inc., *et al.* (the “Debtors”) for the period from September 1, 2024 through September 30, 2024 (the “Compensation Period”).

PLEASE TAKE FURTHER NOTICE that if you object to the relief sought by the Monthly Fee Application, you are required to file a response to the Monthly Fee Application with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 on or before **November 8, 2024 at 4:00 p.m. (ET)** (the “Objection Deadline”). At the same time, you must also serve a copy of the response upon the following parties: i) the Debtors, c/o Fisker Inc., 14 Centerpointe Drive, La Palma, CA 90623 (Attn: John C. DiDonato, jdidonato@hcg.com); ii) counsel to the Debtors, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, NY, 10017 (Attn: Brian M. Resnick, Esq., brian.resnick@davispolk.com; Darren S. Klein, Esq., darren.klein@davispolk.com; Steven Z. Szanzer, Esq., steven.szanzer@davispolk.com; and Richard J. Steinberg, Esq., at richard.steinberg@davispolk.com); iii) counsel to the Debtors, Morris Nichols Arshat & Tunnell LLP, 1201 North Market Street, 16th Floor, Wilmington, DE 19801 (Attn: Robert J. Dehney, Sr., Esq., rdehney@morrisnichols.com; Andrew R. Remming, Esq., aremming@morrisnichols.com);

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Brenna A. Dolphin, Esq., bdolphin@morrisonichols.com; Sophie Rogers Churchill, Esq., srchurchill@morrisonichols.com; iv) counsel to the Official Committee of Unsecured Creditors in the above-captioned Chapter 11 Cases (the "Committee"), Morrison & Foerster LLP, 250 West 55th Street, New York, NY 10019-9601 (Attn: Lorenzo Marinuzzi, Esq., lmarinuzzi@mof.com; Douglas Mannal, Esq., dmannel@mof.com; Benjamin Butterfield, Esq., bbutterfield@mof.com; and Miranda K. Russell, Esq., mrussell@mof.com and Cole Schotz, P.C., 500 Delaware Avenue, Suite 1410, Wilmington, DE 19801 (Attn: Justin R. Alberto, Esq., jalberto@coleschotz.com); and v) the U.S. Trustee, Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801 (Attn: Linda Richenderfer, Esq., linda.richenderfer@usdoj.gov and Malcom M. Bates, Esq., malcolm.m.bates@usdoj.gov).

PLEASE TAKE FURTHER NOTICE THAT IF ANY RESPONSES OR OBJECTIONS TO THE MONTHLY FEE APPLICATION ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE AND THE INTERIM COMPENSATION ORDER, A HEARING ON THE MONTHLY FEE APPLICATION WILL BE HELD AT THE CONVENIENCE OF THE BANKRUPTCY COURT. ONLY THOSE OBJECTIONS MADE IN WRITING AND TIMELY FILED AND RECEIVED IN ACCORDANCE WITH THE INTERIM COMPENSATION ORDER AND THE PROCEDURES DESCRIBED HEREIN WILL BE CONSIDERED BY THE BANKRUPTCY COURT AT SUCH HEARING.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, THEN 80% OF FEES AND 100% OF THE EXPENSES REQUESTED IN THE MONTHLY FEE APPLICATION MAY BE PAID PURSUANT TO THE INTERIM COMPENSATION ORDER WITHOUT FURTHER HEARING OR ORDER OF THE COURT.

Dated: October 25, 2024

Respectfully submitted,

By: /s/ Justin R. Alberto

COLE SCHOTZ, P.C.

Justin R. Alberto (No. 5126)

Patrick J. Reilley (No. 4451)

Stacy L. Newman (No. 5044)

Michael E. Fitzpatrick (No. 6797)

500 Delaware Avenue, Suite 1410

Wilmington, DE 19801

Tel: (302) 652-3131

Facsimile: (302) 652-3117

Email: jalberto@coleschotz.com

preilley@coleschotz.com

snewman@coleschotz.com

mfitzpatrick@coleschotz.com

*Co-Counsel for the Official Committee of
Unsecured Creditors*

-and-

MORRISON & FOERSTER LLP

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Telephone: (212) 468-8000

Facsimile: (212) 468-7900

Email: lmarinuzzi@mofocom

dmannal@mofocom

bbutterfield@mofocom

mrussell@mofocom

dsmolarski@mofocom

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*Co-Counsel for the Official Committee of Unsecured
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EXHIBIT A

Statement of Fees by Subject Matter

Compensation by Project Category from September 1, 2024 through September 30, 2024

Project Category Number	Matter Description	Hours	Total Fees Requested
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EXHIBIT B

Timekeeper Summary

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EXHIBIT C**Summary of Actual and Necessary Expenses**

Description	Billed Amount
Delivery Fees	\$34.04
Travel	\$759.90
Travel Meals	\$21.90
Search Fees	\$80.57
On-line Research - WESTLAW	\$256.20
On-line Research - OTHER DATABASE	\$109.24
Epiq eDiscovery Managed Services	\$940.83
Total	\$2,202.68

EXHIBIT D

Detailed Description of Fees, Expenses, and Disbursements

MORRISON FOERSTER

P.O. BOX 742335
LOS ANGELES, CA 90074-2335

MORRISON & FOERSTER LLP

AUSTIN, BERLIN, BOSTON,
BRUSSELS, DENVER, HONG KONG,
LONDON, LOS ANGELES, MIAMI,
NEW YORK, PALO ALTO, SAN DIEGO,
SAN FRANCISCO, SHANGHAI,
SINGAPORE, TOKYO, WASHINGTON, D.C.

INVOICE

TELEPHONE: 01 415.268.7000
FACSIMILE: 01 415.268.7522

WWW.MOFO.COM

Fisker Inc.
14 Centerpointe Drive
La Palma, CA 90623
CA
UNITED STATES

Taxpayer ID #: [REDACTED]
Invoice Number: 6365155
Invoice Date: October 24, 2024
Client/Matter Number: 034024-0000001
Billing Atty: DOUG MANNAL

Matter Name: BANKRUPTCY

For Professional Services Rendered and Disbursements Incurred through September 30, 2024

	<u>US Dollar</u>
Current Fees	358,086.00
Client Accommodation - Non-Working Travel	(5,943.75)
Client Accommodation - Time Entry Review	(8,088.50)
Net Fees	<u>344,053.75</u>
Current Disbursements	2,202.68
INVOICE TOTAL	<u><u>346,256.43*</u></u>

*In addition to the reductions for time associated with non-working travel and time entry review reflected herein, this amount reflects a reduction of \$9,764, including for, among other things, additional time associated with time entry review and compliance with the cash collateral budget.

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Date	Services	Timekeeper	Hours	Value
002 Asset Disposition				
05-Sep-24	Analyze asset sale from Debtors (.2); correspond with Debtors' counsel regarding same (.2).	Mannal, Doug	0.40	750.00
10-Sep-24	Analyze de minimis asset sale notice.	Russell, Miranda K.	0.10	117.00
25-Sep-24	Analyze Toccata stipulation (.3); correspond with M3 regarding same (.1).	Mannal, Doug	0.40	750.00
26-Sep-24	Analyze memorandum from J. DiDonato (Huron) regarding amendment to American lease deal (.2); call (.2) and correspond (.1) with M3 team regarding Toccata settlement.	Mannal, Doug	0.50	937.50
30-Sep-24	Analyze correspondence from J. DiDonato (Huron) regarding modification to American lease deal.	Mannal, Doug	0.10	187.50
Total: 002 Asset Disposition			1.50	2,742.00
003 Assumption and Rejection of Leases and Contracts				
08-Sep-24	Analyze rejection notice.	Russell, Miranda K.	0.10	117.00
21-Sep-24	Analyze rejection notice.	Russell, Miranda K.	0.10	117.00
29-Sep-24	Analyze rejection notice.	Russell, Miranda K.	0.10	117.00
Total: 003 Assumption and Rejection of Leases and Contracts			0.30	351.00
005 Budgeting (Case)				
04-Sep-24	Comment on draft second interim budget (.3); correspond with D. Mannal and H. Yan regarding same (.1).	Russell, Miranda K.	0.40	468.00
04-Sep-24	Revise second interim budget and staffing plan.	Yan, Donghao (Helen)	0.10	92.50
16-Sep-24	Correspond with Committee co-chairs regarding budget.	Yan, Donghao (Helen)	0.30	277.50
Total: 005 Budgeting (Case)			0.80	838.00
006 Business Operations				
18-Sep-24	Analyze reimbursement request in connection with JPM letter of credit draw (.1); correspond with internal working group regarding same (.1).	Russell, Miranda K.	0.20	234.00
Total: 006 Business Operations			0.20	234.00
007 Case Administration				
03-Sep-24	Circulate notice of ECF filings and case calendar invites to internal working group (.2); update case calendar (.2); revise case calendar invites in connection with subsequent filings (.1).	Coffey, Cameron Tower	0.50	185.00
03-Sep-24	Correspond with H. Yan regarding confidentiality agreement.	Lawrence, J. Alexander	0.20	320.00

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Date	Services	Timekeeper	Hours	Value
03-Sep-24	Correspond with M3 team regarding ongoing work streams (.1); comment on work plan regarding ongoing work streams (.4).	Russell, Miranda K.	0.50	585.00
03-Sep-24	Revise work plan regarding ongoing work streams (.6); correspond with M. Russell regarding same (.3); correspond with internal working group regarding case calendar and upcoming deadlines (.3); correspond with internal working group regarding confidentiality agreement (.3); correspond with Cole Schotz and M3 teams regarding same (.3).	Yan, Donghao (Helen)	1.80	1,665.00
05-Sep-24	Update case calendar.	Coffey, Cameron Tower	0.10	37.00
05-Sep-24	Correspond with internal working group regarding case calendar and upcoming deadlines.	Yan, Donghao (Helen)	0.30	277.50
06-Sep-24	Circulate notice of ECF filings and calendar updates to internal working group (.2); update case calendar (.1).	Coffey, Cameron Tower	0.30	111.00
06-Sep-24	Revise work plan regarding ongoing work streams.	Yan, Donghao (Helen)	0.30	277.50
08-Sep-24	Revise work plan regarding ongoing work streams (.5); correspond with internal working group regarding same (.1).	Russell, Miranda K.	0.60	702.00
09-Sep-24	Circulate notice of ECF filings and calendar updates to internal working group (.2); update case calendar (.1); revise distributed calendar invites (.1).	Coffey, Cameron Tower	0.40	148.00
09-Sep-24	Correspond with White & Case and H. Yan regarding confidentiality agreement.	Lawrence, J. Alexander	0.20	320.00
10-Sep-24	Circulate notice of ECF filings and calendar updates to internal working group.	Coffey, Cameron Tower	0.30	111.00
10-Sep-24	Correspond with H. Yan and White & Case regarding confidentiality agreement.	Lawrence, J. Alexander	0.20	320.00
11-Sep-24	Participate on weekly professionals' call regarding case status and updates.	Butterfield, Benjamin	0.30	420.00
11-Sep-24	Prepare for (.2) and participate on (.3) weekly professionals' call regarding case status and updates.	Mannal, Doug	0.50	937.50
11-Sep-24	Analyze work plan regarding ongoing work streams in advance of professionals' call (.1); participate on weekly professionals' call regarding case status and updates (.3).	Russell, Miranda K.	0.40	468.00
11-Sep-24	Revise work plan regarding ongoing work streams.	Yan, Donghao (Helen)	0.20	185.00
12-Sep-24	Correspond with internal working group regarding ongoing work streams.	Butterfield, Benjamin	0.50	700.00
12-Sep-24	Circulate notice of ECF filings and calendar updates to internal working group (.2); update case calendar (.1).	Coffey, Cameron Tower	0.30	111.00
12-Sep-24	Comment on work plan regarding ongoing work streams.	Russell, Miranda K.	0.20	234.00
13-Sep-24	Circulate notice of ECF filings to internal working group (.3); update case calendar (.1).	Coffey, Cameron Tower	0.40	148.00
13-Sep-24	Revise work plan regarding ongoing work streams.	Yan, Donghao (Helen)	0.30	277.50
16-Sep-24	Participate on call with internal working group regarding ongoing work streams.	Butterfield, Benjamin	0.50	700.00
16-Sep-24	Circulate notice of ECF filings, calendar updates and calendar invites to internal working group (.3); update case calendar (.1).	Coffey, Cameron Tower	0.40	148.00

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Date	Services	Timekeeper	Hours	Value
16-Sep-24	Participate on call with internal working group regarding ongoing work streams.	Mannal, Doug	0.50	937.50
16-Sep-24	Participate on call with internal working group regarding ongoing work streams (.5); comment on work plan regarding same (.2); correspond with internal working group regarding same and upcoming deadlines (.1).	Russell, Miranda K.	0.80	936.00
16-Sep-24	Revise work plan regarding ongoing work streams (.1); participate on call with internal working group regarding same (.5).	Yan, Donghao (Helen)	0.60	555.00
17-Sep-24	Correspond with internal working group regarding ongoing work streams.	Butterfield, Benjamin	0.20	280.00
17-Sep-24	Circulate notice of ECF filings to internal working group.	Coffey, Cameron Tower	0.20	74.00
18-Sep-24	Circulate notice of ECF filings to internal working group (.2); update case calendar (.1).	Coffey, Cameron Tower	0.30	111.00
19-Sep-24	Circulate notice of ECF filings to internal working group (.2); update case calendar (.1); revise calendar invitations (.1).	Coffey, Cameron Tower	0.40	148.00
20-Sep-24	Circulate notice of ECF filings and calendar updates to internal working group (.2); update case calendar (.1).	Coffey, Cameron Tower	0.30	111.00
23-Sep-24	Circulate notice of ECF filings and calendar updates to internal working group (.2); update case calendar (.1).	Coffey, Cameron Tower	0.30	111.00
23-Sep-24	Prepare for (.2) and participate on (.6) call with H. Yan and M. Russell regarding ongoing work streams.	Mannal, Doug	0.80	1,500.00
23-Sep-24	Comment on work plan regarding ongoing work streams (.3); call with D. Mannal and H. Yan regarding same (.6); follow-up call with H. Yan regarding same (.1).	Russell, Miranda K.	1.00	1,170.00
23-Sep-24	Revise work plan regarding ongoing work streams (.3); call with M. Russell and D. Mannal regarding same (.6); follow-up call with M. Russell regarding same (.1).	Yan, Donghao (Helen)	1.00	925.00
24-Sep-24	Circulate notice of ECF filings and case calendar invites to internal working group (.2); revise case calendar invites (.1).	Coffey, Cameron Tower	0.30	111.00
24-Sep-24	Correspond with M3 regarding Committee deliverables in preparation for weekly call.	Mannal, Doug	0.20	375.00
25-Sep-24	Circulate notice of ECF filings and calendar invites to internal working group (.1); update case calendar (.1); revise calendar invites (.1).	Coffey, Cameron Tower	0.30	111.00
25-Sep-24	Revise work plan regarding ongoing work streams.	Yan, Donghao (Helen)	0.50	462.50
26-Sep-24	Circulate notice of ECF filings and calendar updates to internal working group.	Coffey, Cameron Tower	0.20	74.00
26-Sep-24	Comment on draft work plan regarding ongoing work streams.	Russell, Miranda K.	0.20	234.00
26-Sep-24	Revise work plan regarding ongoing work streams.	Yan, Donghao (Helen)	0.70	647.50
27-Sep-24	Circulate notice of ECF filings and calendar updates to internal working group (.1); update case calendar (.1).	Coffey, Cameron Tower	0.20	74.00
30-Sep-24	Circulate notice of ECF filings and calendar updates to internal working group (.2); update case calendar (.1).	Coffey, Cameron Tower	0.30	111.00

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Date	Services	Timekeeper	Hours	Value
30-Sep-24	Analyze (.1) and comment on (.1) work plan regarding ongoing work streams.	Mannal, Doug	0.20	375.00
30-Sep-24	Correspond with H. Yan regarding ongoing work streams (.1); comment on work plan regarding same (.2).	Russell, Miranda K.	0.30	351.00
30-Sep-24	Revise work plan regarding ongoing work streams.	Yan, Donghao (Helen)	0.60	555.00
Total: 007 Case Administration			20.10	19,727.50
008 Claims Administration and Objections				
03-Sep-24	Call with Debtors' counsel regarding customer reservations claims (.3); correspond with internal working group regarding same (.2).	Yan, Donghao (Helen)	0.50	462.50
16-Sep-24	Call with M. Dundon (Dundon Advisors) regarding Foxconn claim settlement proposal and case status.	Mannal, Doug	0.50	937.50
17-Sep-24	Analyze Foxconn claim (.2); correspond with B. Butterfield regarding same (.1).	Mannal, Doug	0.30	562.50
24-Sep-24	Analyze Foxconn settlement (.4); participate on call with Debtors' counsel regarding same (.3); correspond with B. Butterfield regarding same (.3).	Mannal, Doug	1.00	1,875.00
24-Sep-24	Analyze materials from Foxconn affiliates regarding claims (.5); participate on call (.3) and correspond (.2) with Debtors' counsel regarding Foxconn settlement.	Yan, Donghao (Helen)	1.00	925.00
25-Sep-24	Analyze Foxconn claims.	Butterfield, Benjamin	1.00	1,400.00
25-Sep-24	Analyze additional materials from Foxconn affiliates regarding claims.	Yan, Donghao (Helen)	0.40	370.00
26-Sep-24	Analyze Foxconn claims settlement proposal (.4); correspond with H. Yan regarding same (.2).	Mannal, Doug	0.60	1,125.00
Total: 008 Claims Administration and Objections			5.30	7,657.50
011 Employment and Fee Applications				
02-Sep-24	Correspond with Committee professionals regarding July fee statements.	Russell, Miranda K.	0.20	234.00
03-Sep-24	Meet with M. Russell regarding July monthly fee statement.	Butterfield, Benjamin	0.10	140.00
03-Sep-24	Draft MoFo first monthly fee application (1.4) and related exhibits (.9).	Guido, Laura	2.30	1,150.00
03-Sep-24	Analyze (.6) and comment on (.3) August fee statement.	Mannal, Doug	0.90	1,687.50
03-Sep-24	Meet with B. Butterfield regarding July monthly fee statement (.1); coordinate preparation of same with internal working group (.3); correspond with Cole Schotz team regarding filing of July monthly fee statements (.2); revise MoFo July monthly fee statement (1.0); correspond with internal working group regarding same (.1); call with U.S. Trustee regarding Orrick retention and other current matters (.3); analyze supplemental OCP filing (.1).	Russell, Miranda K.	2.10	2,457.00
03-Sep-24	Correspond with internal working group regarding first monthly fee application (.1); revise same (.5).	Smolarski, Darren	0.60	597.00

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Date	Services	Timekeeper	Hours	Value
08-Sep-24	Correspond with Committee professionals regarding August monthly fee statements.	Russell, Miranda K.	0.10	117.00
09-Sep-24	Correspond with R. Steinberg (DPW) regarding Orrick OCP retention.	Russell, Miranda K.	0.10	117.00
10-Sep-24	Meet with M. Russell regarding Orrick OCP retention and solicitation matters.	Butterfield, Benjamin	0.10	140.00
10-Sep-24	Call with B. Dolphin (MNAT) regarding Orrick OCP retention (.1); meet with B. Butterfield regarding same and solicitation matters (.1); correspond with H. Yan regarding Orrick retention (.1).	Russell, Miranda K.	0.30	351.00
10-Sep-24	Correspond with Cole Schotz team and internal working group regarding Orrick retention.	Yan, Donghao (Helen)	0.20	185.00
12-Sep-24	Call with DPW team regarding Orrick OCP retention issues (.2); correspond with U.S. Trustee and internal working group regarding MoFo first monthly fee statement (.1).	Russell, Miranda K.	0.30	351.00
13-Sep-24	Correspond with D. Mannal regarding monthly fee applications (.1); correspond with B. Dolphin (MNAT) regarding Orrick OCP retention (.1).	Russell, Miranda K.	0.20	234.00
16-Sep-24	Correspond (.1) and call (.1) with B. Dolphin (MNAT) regarding Orrick OCP retention.	Russell, Miranda K.	0.20	234.00
18-Sep-24	Correspond with MNAT team regarding Orrick retention (.1); correspond with E. Greenhaus (M3) regarding August fee applications (.1).	Russell, Miranda K.	0.20	234.00
18-Sep-24	Analyze RBSM retention application.	Yan, Donghao (Helen)	0.30	277.50
23-Sep-24	Draft MoFo August fee application.	Guido, Laura	0.40	200.00
23-Sep-24	Call (.1) and correspond (.1) with M. Russell regarding preparation of August fee statement.	Murphy, Joseph	0.20	199.00
23-Sep-24	Correspond with internal working group regarding preparation of August fee statement (.2); call with J. Murphy regarding same (.1).	Russell, Miranda K.	0.30	351.00
24-Sep-24	Draft MoFo August fee application.	Guido, Laura	1.60	800.00
24-Sep-24	Analyze August fee application (1.3); correspond with J. Murphy and M. Russell regarding same (.2).	Mannal, Doug	1.50	2,812.50
24-Sep-24	Revise August fee statement in preparation for filing (.4); correspond with internal working group and Cole Schotz team regarding finalizing and filing of August fee statement (.3); meet with M. Russell regarding August monthly fee statement (.1).	Murphy, Joseph	0.80	796.00
24-Sep-24	Meet with J. Murphy regarding August monthly fee statement (.1); correspond with internal working group regarding same (.4); revise same (.7); analyze revisions to same (.1).	Russell, Miranda K.	1.30	1,521.00
24-Sep-24	Revise August monthly fee statement.	Yan, Donghao (Helen)	0.20	185.00
Total: 011 Employment and Fee Applications			14.50	15,370.50

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013 Financing and Cash Collateral				
10-Sep-24	Correspond with internal working group regarding cash collateral budget.	Russell, Miranda K.	0.10	117.00
13-Sep-24	Correspond with internal working group regarding certain issues in connection with cash collateral.	Yan, Donghao (Helen)	0.40	370.00
Total: 013 Financing and Cash Collateral			0.50	487.00
015 Meetings and Communications with Creditors				
03-Sep-24	Correspond with M. Russell and H. Yan regarding upcoming calls with Committee and other Committee professionals.	Mannal, Doug	0.40	750.00
03-Sep-24	Correspond with creditor regarding claim inquiry.	Yan, Donghao (Helen)	0.30	277.50
04-Sep-24	Prepare for (.2) and participate on (.4) call with Committee co-chairs regarding trust structure and plan negotiations.	Mannal, Doug	0.60	1,125.00
04-Sep-24	Draft (.2) and circulate (.1) update to Committee regarding Committee recommendation letter and motion to unseal; participate on call with Committee co-chairs regarding trust structure and plan negotiations (.4).	Yan, Donghao (Helen)	0.70	647.50
05-Sep-24	Call (.7) and correspond (.3) with creditor regarding claim inquiry.	Yan, Donghao (Helen)	1.00	925.00
07-Sep-24	Correspond with Committee regarding plan comments.	Russell, Miranda K.	0.10	117.00
09-Sep-24	Draft (.4) and circulate (.1) update to Committee regarding Rule 9019 settlement hearing; call with D. Losik (Avnet) regarding same (.1).	Yan, Donghao (Helen)	0.60	555.00
10-Sep-24	Call with creditor regarding case status.	Yan, Donghao (Helen)	0.30	277.50
11-Sep-24	Participate on call with Committee co-chairs regarding case status.	Butterfield, Benjamin	0.30	420.00
11-Sep-24	Prepare for (.2) and participate on (.3) call with Committee co-chairs regarding case status.	Mannal, Doug	0.50	937.50
11-Sep-24	Correspond with B. Butterfield and D. Mannal regarding Committee call.	Russell, Miranda K.	0.10	117.00
12-Sep-24	Prepare for (.2) and participate on (.3) call with Committee regarding plan, liquidation trust and trustee.	Mannal, Doug	0.50	937.50
12-Sep-24	Draft (.2) and circulate (.1) update to Committee regarding case status; participate on call with Committee regarding plan, liquidation trust and trustee (.3).	Yan, Donghao (Helen)	0.60	555.00
13-Sep-24	Call with Committee members regarding potential liquidating trust candidates.	Mannal, Doug	0.40	750.00
13-Sep-24	Correspond with creditors regarding plan.	Yan, Donghao (Helen)	0.80	740.00
16-Sep-24	Draft (.2) and circulate (.1) update to Committee regarding status conference.	Yan, Donghao (Helen)	0.30	277.50
17-Sep-24	Call with Committee members regarding plan status.	Butterfield, Benjamin	0.50	700.00
17-Sep-24	Correspond with H. Yan regarding correspondence to Committee regarding update.	Mannal, Doug	0.20	375.00

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Date	Services	Timekeeper	Hours	Value
17-Sep-24	Correspond with H. Yan regarding correspondence to Committee regarding comments to plan.	Russell, Miranda K.	0.10	117.00
17-Sep-24	Draft (.4) and circulate (.1) update to Committee regarding plan comments and Heights certification; correspond with B. Butterfield regarding same (.1).	Yan, Donghao (Helen)	0.60	555.00
18-Sep-24	Participate on call with Committee co-chairs regarding case status.	Butterfield, Benjamin	0.40	560.00
18-Sep-24	Participate on call with Committee co-chairs regarding case status (.4); analyze (.1) and comment on (.1) agenda for Committee call; correspond with Committee members regarding plan provisions and liquidating trustee (.1).	Mannal, Doug	0.70	1,312.50
18-Sep-24	Correspond with H. Yan regarding correspondence to Committee regarding plan updates.	Russell, Miranda K.	0.10	117.00
18-Sep-24	Participate on call with Committee co-chairs regarding case status (.4); draft (.3) and circulate (.1) updates to Committee regarding same.	Yan, Donghao (Helen)	0.80	740.00
19-Sep-24	Prepare for (.1) and participate on (.3) call with Committee regarding plan updates.	Butterfield, Benjamin	0.40	560.00
19-Sep-24	Prepare for (.4) and participate on (.3) call with Committee regarding plan updates; call with Committee members regarding selection of liquidating trustee (.5).	Mannal, Doug	1.20	2,250.00
19-Sep-24	Participate on call with Committee regarding plan updates.	Russell, Miranda K.	0.30	351.00
19-Sep-24	Draft (.4) and circulate (.1) updates to Committee regarding status conference; participate on call with Committee regarding plan updates (.3); revise attendance sheet of same (.1).	Yan, Donghao (Helen)	0.90	832.50
23-Sep-24	Call with Committee members regarding liquidating trust candidates.	Mannal, Doug	0.20	375.00
23-Sep-24	Draft (.2) and circulate (.1) updates to Committee regarding amended plan; correspond with creditor regarding claim inquiries (.6).	Yan, Donghao (Helen)	0.90	832.50
25-Sep-24	Prepare for (.3) and participate on (.2) call with Committee co-chairs regarding case status and strategy; call with Committee members regarding payment of fees to owners' association and vehicle issues (.5); analyze (.3) and revise (.2) materials for Committee call (.5); correspond with M3 regarding same (.1).	Mannal, Doug	1.60	3,000.00
25-Sep-24	Participate on call with Committee co-chairs regarding case status and strategy (.2); correspond with H. Yan regarding materials for Committee call (.1).	Russell, Miranda K.	0.30	351.00
25-Sep-24	Draft (.5) and circulate (.1) updates to Committee regarding case status; draft agenda for Committee call (.2); draft materials regarding Foxconn claims for same (1.2); correspond with internal working group regarding same (.4); participate on call with Committee co-chairs regarding case status and strategy (.2).	Yan, Donghao (Helen)	2.60	2,405.00
26-Sep-24	Prepare for (.4) and participate (.5) on call with Committee regarding case strategy and updates.	Butterfield, Benjamin	0.90	1,260.00

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Date	Services	Timekeeper	Hours	Value
26-Sep-24	Prepare for (.5) and participate on (.5) call with Committee regarding case strategy and updates; follow-up calls with Committee members regarding next steps and liquidating trustee (.7).	Mannal, Doug	1.70	3,187.50
26-Sep-24	Correspond with H. Yan regarding materials for Committee call (.1); participate on call with Committee regarding case strategy and updates (.5).	Russell, Miranda K.	0.60	702.00
26-Sep-24	Draft (.4) and circulate (.1) updates to Committee regarding case status; participate on call with Committee regarding case strategy and updates (.5); revise attendance sheet for same (.1).	Yan, Donghao (Helen)	1.10	1,017.50
27-Sep-24	Draft (.3) and circulate (.1) updates to Committee regarding case status.	Yan, Donghao (Helen)	0.40	370.00
30-Sep-24	Correspond with Committee regarding liquidating trust comp structure.	Mannal, Doug	0.10	187.50
30-Sep-24	Correspond (.5) and call (.3) with Committee members regarding liquidating trust; correspond with creditor regarding plan confirmation (.3).	Yan, Donghao (Helen)	1.10	1,017.50
Total: 015 Meetings and Communications with Creditors			25.20	32,584.50
016 Non-Working Travel				
09-Sep-24	Non-working travel to/from Delaware for disclosure statement hearing.	Butterfield, Benjamin	3.00	4,200.00
09-Sep-24	Non-working travel to/from Delaware for disclosure statement hearing.	Mannal, Doug	4.10	7,687.50
Total: 016 Non-Working Travel			7.10	11,887.50
017 Plan and Disclosure Statement				
03-Sep-24	Revise Committee recommendation letter (.3); call with H. Yan regarding same (.2); analyze filed 9019 motion (.3) and proposed order (.3); participate on call with internal working group regarding plan and disclosure statement (.4).	Butterfield, Benjamin	1.50	2,100.00
03-Sep-24	Calls with R. Steinberg (DPW) (.1) and A. Leary (DPW) (.1) regarding Orrick retention and plan matters; correspond with internal working group regarding Orrick retention, plan work streams and other ongoing work streams (.5); correspond with White & Case team regarding draft trust agreement (.1).	Russell, Miranda K.	0.80	936.00
03-Sep-24	Participate on call with internal working group regarding plan and disclosure statement (.4); draft Committee recommendation letter (.8); call with B. Butterfield regarding same (.2); revise same (.3).	Yan, Donghao (Helen)	1.70	1,572.50
04-Sep-24	Analyze plan (1.8); participate on call with internal working group regarding open plan work streams (.6).	Butterfield, Benjamin	2.40	3,360.00

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Date	Services	Timekeeper	Hours	Value
04-Sep-24	Prepare for (.1) and participate on (.6) call with internal working group regarding open plan work streams; analyze (.3) and comment on (.1) letter in support of plan; analyze trust structure (.3) and funding issues (.2).	Mannal, Doug	1.60	3,000.00
04-Sep-24	Participate on call with internal working group regarding open plan work streams (.6); analyze SEC comments in connection with plan (.1); correspond with internal working group regarding same (.1).	Russell, Miranda K.	0.80	936.00
04-Sep-24	Participate on call with internal working group regarding open plan work streams (.6); analyze legal research regarding issues in connection with plan releases (.9); call with E. Greenhaus (M3) regarding plan releases (.1).	Yan, Donghao (Helen)	1.60	1,480.00
05-Sep-24	Negotiate settlement of Austria issue (1.0); participate on calls regarding same (.6); call with D. Mannal regarding Austria settlement (.3); follow-up call with D. Mannal regarding same and impact on plan (.2).	Butterfield, Benjamin	2.10	2,940.00
05-Sep-24	Call with B. Butterfield regarding Austria settlement (.3); prepare for (1.1) and participate on (.6) call with Debtors' professionals regarding plan and trust budget; call with potential candidate for trustee (1.1); prepare for (.3) and participate on (.6) call with Magna regarding Austria settlement and impact on plan; follow-up call with B. Butterfield regarding same (.2); calls with M3 regarding budget (.3).	Mannal, Doug	4.50	8,437.50
05-Sep-24	Further comment on draft plan (1.4) and disclosure statement (1.4); correspond with DPW and internal working group regarding comments to same and solicitation procedures (.3).	Russell, Miranda K.	3.10	3,627.00
06-Sep-24	Negotiate settlement of Austria issue (.4); call with Weil team regarding same (.3); call with D. Mannal regarding settlement of claims in Austria settlement and impact of plan (.3); call with B. Resnick (DPW) regarding budget and Austria settlement (.3); call with D. Mannal regarding same (.3); revise plan (3.9); call with M. Russell regarding Committee's plan comments (.1).	Butterfield, Benjamin	5.60	7,840.00
06-Sep-24	Calls (.8) and correspond (.4) with counsel for Debtors and Magna regarding settlement of claims in Austria settlement and impact of plan; call with B. Butterfield regarding same (.3); analyze comment regarding plan (.4); correspond with M. Russell regarding same (.3); call with B. Resnick (DPW) regarding budget and Austria settlement (.3); call with B. Butterfield regarding same (.3); analyze trust budget (.2); call with M3 regarding same (.3).	Mannal, Doug	3.30	6,187.50
06-Sep-24	Correspond with internal working group regarding Committee's plan comments (.3); call with B. Butterfield regarding same (.1); coordinate with K. Schaaf regarding insurance analysis of same (.3); calls with R. Steinberg (DPW) and M. Hartlipp (Cole Schotz) regarding solicitation procedures and other plan matters (.4).	Russell, Miranda K.	1.10	1,287.00

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Date	Services	Timekeeper	Hours	Value
06-Sep-24	Analyze U.S. Trustee's objection regarding combined disclosure statement and plan (.8); analyze combined disclosure statement and plan (.4).	Yan, Donghao (Helen)	1.20	1,110.00
07-Sep-24	Revise plan.	Butterfield, Benjamin	4.40	6,160.00
07-Sep-24	Analyze B. Butterfield's comments regarding plan (.3); correspond with DPW, B. Butterfield and counsel to U.S. Bank regarding same (.2); analyze H. Yan's summary regarding U.S. Trustee's disclosure statement objection (.1); analyze DPW team's comments regarding Committee recommendation letter (.1); correspond with internal working group regarding same (.1); correspond with DPW regarding Austrian settlement updates (.1).	Russell, Miranda K.	0.90	1,053.00
08-Sep-24	Correspond with internal working group and Weil team regarding comments to plan (.1); call with D. Mannal regarding revised plan (.2).	Butterfield, Benjamin	0.30	420.00
08-Sep-24	Analyze (2.3) and comment on (.9) revised plan; call (.2) and correspond (.1) with B. Resnick (DPW) regarding same; call (.2) and correspond (.1) with B. Butterfield regarding same.	Mannal, Doug	3.80	7,125.00
08-Sep-24	Correspond with DPW team and Cole Schotz team regarding additional plan comments and draft solicitation procedures order.	Russell, Miranda K.	0.20	234.00
09-Sep-24	Negotiate terms of plan (1.5); call with M. Russell regarding Committee statement regarding plan (.2).	Butterfield, Benjamin	1.70	2,380.00
09-Sep-24	Participate on all-hands call regarding Fisker Austria settlement (.6); calls (.4) and correspond (.2) with counsel for Debtors and Magna regarding Rule 9019 settlement; analyze (.7) and comment on (.4) proposed Rule 9019 order and Fisker Austria settlement term sheet; analyze (2.4) and comment on (1.8) proposed plan.	Mannal, Doug	6.50	12,187.50
09-Sep-24	Call with B. Butterfield regarding Committee statement regarding plan (.2); revise same (.6); correspond with B. Butterfield, DPW team and White & Case team regarding same (.2); correspond with K. Schaaf regarding insurance analysis of plan (.2); correspond with counsel to U.S. Bank regarding comments to plan (.1).	Russell, Miranda K.	1.30	1,521.00
10-Sep-24	Comment on plan (1.2); correspond with internal working group regarding next steps in connection with same (.2).	Butterfield, Benjamin	1.40	1,960.00
10-Sep-24	Analyze (1.2) and comment on (.9) release provisions and other plan provisions; correspond with DPW regarding same (.1).	Mannal, Doug	2.20	4,125.00
10-Sep-24	Call with B. Dolphin (MNAT) regarding solicitation procedures order and materials (.1); correspond with internal working group and R. Steinberg (DPW) regarding same (.1); correspond with H. Yan regarding plan (.1).	Russell, Miranda K.	0.30	351.00
10-Sep-24	Analyze revised plan.	Yan, Donghao (Helen)	0.80	740.00
11-Sep-24	Meet with D. Mannal and. M. Russell regarding plan and disclosure agreement (3.3); revise plan (1.2).	Butterfield, Benjamin	4.50	6,300.00

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11-Sep-24	Analyze (.2) and comment on (.2) plan provisions; meet with B. Butterfield and M. Russell regarding plan and disclosure agreement (3.3).	Mannal, Doug	3.70	6,937.50
11-Sep-24	Meet with B. Butterfield and D. Mannal regarding plan and disclosure statement (3.3); correspond with internal working group regarding issues list in connection with same (.2).	Russell, Miranda K.	3.50	4,095.00
12-Sep-24	Comment on plan (3.2); prepare for (1.1) and participate on (.8) call with DPW and White & Case regarding plan and disclosure statement.	Butterfield, Benjamin	5.10	7,140.00
12-Sep-24	Call with M3 team regarding trust budget (.5); prepare for (.1) and participate on (.8) call with DPW and White & Case regarding plan and disclosure statement; correspond with internal working group regarding Uzzi certification (.2).	Mannal, Doug	1.60	3,000.00
12-Sep-24	Draft (1.6) and revise (.7) issues list for plan and disclosure statement; correspond with B. Butterfield regarding same (.1); participate on call with DPW and White & Case regarding plan and disclosure statement (partial) (.5).	Russell, Miranda K.	2.90	3,393.00
12-Sep-24	Correspond with internal working group regarding Heights' certification.	Yan, Donghao (Helen)	0.40	370.00
13-Sep-24	Analyze issues in connection with plan markup.	Butterfield, Benjamin	1.50	2,100.00
13-Sep-24	Calls (.6) and correspond (.3) with potential liquidating trust candidates.	Mannal, Doug	0.90	1,687.50
13-Sep-24	Correspond with internal working group regarding Heights' certification.	Yan, Donghao (Helen)	0.20	185.00
15-Sep-24	Call (.2) and correspond (.2) with potential trustee candidates.	Mannal, Doug	0.40	750.00
16-Sep-24	Draft Zahabi v. Fisker case calendar in connection with plan analysis (.7); circulate same to internal working group (.2).	Coffey, Cameron Tower	0.90	333.00
16-Sep-24	Call with counsel for USB regarding potential role as liquidating trustee.	Mannal, Doug	0.30	562.50
16-Sep-24	Correspond with White & Case and DPW teams regarding plan supplement documents.	Russell, Miranda K.	0.20	234.00
16-Sep-24	Analyze issues regarding plan provision on ongoing class action.	Yan, Donghao (Helen)	0.50	462.50
17-Sep-24	Analyze UL certificate (1.0); prepare for (.4) and participate on (.5) call with DPW, Huron and M3 teams regarding emergence budget; follow-up call with D. Mannal regarding same (.3).	Butterfield, Benjamin	2.20	3,080.00
17-Sep-24	Call with various trustee candidates (.8); participate on call with DPW, Huron and M3 teams regarding emergence budget (.5); follow-up call with B. Butterfield regarding same (.3); call with B. Resnick (DPW) regarding confirmation issues (.2).	Mannal, Doug	1.80	3,375.00
17-Sep-24	Analyze Trust structuring issues (.2); correspond with White & Case team regarding draft Trust agreements (.1); coordinate with professionals regarding emergence budget (.1); participate on call with DPW, Huron and M3 teams regarding same (.5).	Russell, Miranda K.	0.90	1,053.00

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Date	Services	Timekeeper	Hours	Value
18-Sep-24	Call with H. Yan regarding review of trust documents (.1); participate on call with M3 team regarding reimbursement mechanics (.3).	Butterfield, Benjamin	0.40	560.00
18-Sep-24	Correspond with B. Butterfield and D. Mannel regarding review of IP trust agreement and drafting of liquidating trust agreement (.2); correspond with MoFo specialist teams regarding same (.4); draft liquidating trust agreement (2.2).	Russell, Miranda K.	2.80	3,276.00
18-Sep-24	Call with B. Butterfield regarding review of trust documents (.1); participate on call with M3 team regarding reimbursement mechanics (.3).	Yan, Donghao (Helen)	0.40	370.00
19-Sep-24	Analyze plan.	Butterfield, Benjamin	0.60	840.00
19-Sep-24	Call with M. Dundon (Dundon Advisors) regarding potential role as liquidating trustee (.5); correspond with A. Halperin (Paul Weis) regarding same (.2); call (.2) and correspond (.1) with counsel for USB regarding same; analyze (.7) and comment on (.4) plan revisions; call (.1) and correspond (.1) with DPW regarding plan comments; correspond with M. Russell regarding release in plan (.2).	Mannel, Doug	2.50	4,687.50
19-Sep-24	Further draft liquidating trust agreement (.6); analyze revised draft of plan (.4); draft issues list regarding same (.5); correspond with specialist teams regarding revised draft of plan (.1); correspond with B. Butterfield regarding next steps (.1).	Russell, Miranda K.	1.70	1,989.00
20-Sep-24	Comment on plan (.4); call with M. Russell regarding same and disclosure statement (.3).	Butterfield, Benjamin	0.70	980.00
20-Sep-24	Retrieve precedent liquidating trust agreements.	Guido, Laura	0.20	100.00
20-Sep-24	Comment on plan (1.3); correspond with internal working group regarding same (.1); call with M. Russell regarding same and disclosure statement (.3).	Mannel, Doug	1.70	3,187.50
20-Sep-24	Revise plan (2.3) and disclosure statement (2.8); call with B. Butterfield (.3) and D. Mannel (.3) regarding same; correspond with DPW and W&C teams regarding same (.1).	Russell, Miranda K.	5.80	6,786.00
21-Sep-24	Prepare for (.3) and participate on (.9) call with DPW and White & Case teams regarding plan; revise trust agreement (1.2).	Butterfield, Benjamin	2.40	3,360.00
21-Sep-24	Prepare for (.2) and participate on (.9) call with DPW and White & Case teams regarding plan; analyze (.8) and comment on (.3) same.	Mannel, Doug	2.20	4,125.00
21-Sep-24	Correspond with internal working group and DPW team regarding next steps for plan and plan supplement documents (.2); participate on call with DPW and White & Case teams regarding plan (.9); follow-up call with N. Abbattista (White & Case) regarding same (.2); draft revised insert for same (.2); correspond (.1) and call (.1) with E. Greenhaus (M3) regarding IP schedule.	Russell, Miranda K.	1.70	1,989.00
22-Sep-24	Revise liquidating trust agreement.	Butterfield, Benjamin	3.40	4,760.00

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22-Sep-24	Analyze (.2) and comment on (.2) revised plan; correspond with DPW team regarding same (.2); analyze (.2) and comment on (.1) correspondence to Orrick.	Mannal, Doug	0.90	1,687.50
22-Sep-24	Analyze revised draft of plan (.1); draft issues list regarding same (.1); analyze budget update from M3 team (.1); draft language regarding Debtors' professional releases (.2).	Russell, Miranda K.	0.50	585.00
23-Sep-24	Revise liquidating trust agreement (.7); revise plan (2.9); participate on call with White & Case regarding same (.6); participate on call with DPW team regarding same (.4); call with D. Mannal regarding same (.2).	Butterfield, Benjamin	4.80	6,720.00
23-Sep-24	Participate on call with White & Case regarding plan (.6); participate on call with DPW team regarding same (.4); correspond with internal working group regarding same (.1); analyze (.4) and comment on (.3) same; call with B. Butterfield regarding same (.2); call with liquidating trust candidates (.7); call (.1) and correspond (.1) with M3 team regarding budget; analyze same (.1).	Mannal, Doug	3.00	5,625.00
23-Sep-24	Revise Committee statement in support of plan (.3); correspond with internal working group regarding same and plan supplement documents (.6); further revise same (.3); analyze (.5) and revise plan (1.0) and liquidating trust agreement (.4); correspond with B. Butterfield regarding plan supplement documents (.1); coordinate with DPW team and internal working group regarding filing and finalization of same (.4).	Russell, Miranda K.	3.60	4,212.00
23-Sep-24	Analyze revised plan (.7) and trust agreements (.7); analyze (.3) and revise (.3) Committee recommendation letter; analyze draft notice for plan supplement (.2).	Yan, Donghao (Helen)	2.20	2,035.00
24-Sep-24	Analyze liquidating trust issues (1.4); correspond with Committee professionals regarding same (.3).	Butterfield, Benjamin	1.70	2,380.00
24-Sep-24	Calls (.1) and correspond (.1) with R. Steinberg (DPW) regarding release issues; call with B. Resnick (DPW) regarding Cooley fee issue (.2).	Mannal, Doug	0.40	750.00
25-Sep-24	Analyze budget updates from M3 in connection with plan supplement (.2); correspond with B. Butterfield regarding same and remediation work (.1); follow-up call with E. Greenhaus (M3) regarding same (.2); participate on call with Huron, M3 and DPW regarding same (.6).	Russell, Miranda K.	1.10	1,287.00
25-Sep-24	Participate on call with Huron, M3 and DPW regarding budget updates from M3 and remediation work.	Yan, Donghao (Helen)	0.60	555.00
26-Sep-24	Prepare for (.1) and participate on (.4) call with NHTSA and D. Mannal regarding plan issues; correspond with internal working group regarding trust budgeting issues (.8).	Butterfield, Benjamin	1.30	1,820.00
26-Sep-24	Participate on call with NHTSA and B. Butterfield regarding plan issues (.4); call with M. Dundon (Dundon Advisors) regarding fee structure (.3).	Mannal, Doug	0.70	1,312.50

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Date	Services	Timekeeper	Hours	Value
26-Sep-24	Correspond with DPW and internal working group regarding status of open confirmation work streams.	Russell, Miranda K.	0.10	117.00
27-Sep-24	Analyze liquidating trust agreement.	Butterfield, Benjamin	2.00	2,800.00
27-Sep-24	Analyze (.9) and comment on (.4) liquidating trust agreement; calls (.2) and correspond (.2) with Committee members regarding compensation structure for Dundon advisors; correspond with R. Winning (M3) regarding same (.2); revise proposed compensation structure (.4); correspond with M. Dundon (Dundon Advisors) regarding same (.1); analyze correspondence from Orrick regarding release (.1).	Mannal, Doug	2.50	4,687.50
27-Sep-24	Correspond with R. Steinberg (DPW) regarding release language in plan (.1); correspond with White & Case team regarding draft confirmation order (.1).	Russell, Miranda K.	0.20	234.00
29-Sep-24	Correspond with H. Yan regarding Dundon fee approval.	Mannal, Doug	0.10	187.50
30-Sep-24	Participate on call with DPW regarding liquidating trust agreement.	Butterfield, Benjamin	0.70	980.00
30-Sep-24	Call (.2) and correspond (.1) with Dundon advisors regarding comp structure.	Mannal, Doug	0.30	562.50
30-Sep-24	Call with H. Yan regarding plan work streams (.1); participate on call with DPW regarding liquidating trust agreement (.7); analyze (.7) and revise (.6) confirmation order.	Russell, Miranda K.	2.10	2,457.00
30-Sep-24	Correspond with M. Hartlipp (Cole Schotz) regarding confirmation order (.1); correspond with E. Greenhaus (M3) regarding plan treatment (.1); call with M. Russell regarding plan work streams (.1).	Yan, Donghao (Helen)	0.30	277.50
Total: 017 Plan and Disclosure Statement			142.20	206,410.00
021 Tax				
16-Sep-24	Correspond with P. Jaworskyj regarding tax review of plan.	Russell, Miranda K.	0.20	234.00
19-Sep-24	Analyze taxes matters in connection with disclosure statement.	Jaworskyj, Philip S.	1.00	1,295.00
20-Sep-24	Calls with M. Russell regarding tax issues in connection with plan and liquidating trust agreement (.6); call with D. Sturgeon regarding tax review of trust agreement and disclosure statement (.3); further analyze (1.1) and comment on (.8) same.	Jaworskyj, Philip S.	2.80	3,626.00
20-Sep-24	Calls with P. Jaworskyj regarding tax issues in connection with plan and liquidating trust agreement (.6); follow-up call with E. Greenhaus (M3) regarding same (.2); correspond with internal working group regarding same (.1).	Russell, Miranda K.	0.90	1,053.00
20-Sep-24	Call with P. Jaworskyj regarding tax review of trust agreement and disclosure statement.	Sturgeon, Dave B.	0.30	450.00

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Date	Services	Timekeeper	Hours	Value
21-Sep-24	Correspond with M. Russell and D. Sturgeon regarding finalization of tax review for trust agreement and disclosure schedule.	Jaworskyj, Philip S.	0.30	388.50
21-Sep-24	Analyze trust agreement (.6) and disclosure statement (.4); correspond with P. Jaworskyj regarding same (.2).	Sturgeon, Dave B.	1.20	1,800.00
Total: 021 Tax			6.70	8,846.50
024 Hearings				
05-Sep-24	Prepare hearing binder (.9) correspond internal working group regarding same (.2).	Coffey, Cameron Tower	1.10	407.00
05-Sep-24	Correspond with H. Yan regarding preparation for disclosure statement hearing.	Russell, Miranda K.	0.10	117.00
05-Sep-24	Correspond with Cole Schotz team regarding preparations for upcoming hearing.	Yan, Donghao (Helen)	0.20	185.00
06-Sep-24	Draft hearing binder (1.1); correspond with internal working group regarding same (.1).	Coffey, Cameron Tower	1.20	444.00
09-Sep-24	Prepare for (3.7) and attend (1.4) disclosure statement hearing.	Butterfield, Benjamin	5.10	7,140.00
09-Sep-24	Prepare for (1.0) and attend (1.4) disclosure statement hearing.	Mannal, Doug	2.40	4,500.00
09-Sep-24	Correspond with Cole Schotz team regarding hearing preparation for disclosure statement hearing (.1); attend disclosure statement hearing (telephonically) (1.4).	Russell, Miranda K.	1.50	1,755.00
09-Sep-24	Attend disclosure statement hearing (telephonically).	Yan, Donghao (Helen)	1.40	1,295.00
13-Sep-24	Correspond with Cole Schotz team regarding upcoming status conference.	Russell, Miranda K.	0.10	117.00
13-Sep-24	Correspond with internal working group and Cole Schotz team regarding upcoming hearing.	Yan, Donghao (Helen)	0.20	185.00
14-Sep-24	Correspond with Cole Schotz team regarding upcoming status conference.	Russell, Miranda K.	0.10	117.00
16-Sep-24	Correspond with Cole Schotz team and H. Yan regarding status conference.	Russell, Miranda K.	0.20	234.00
Total: 024 Hearings			13.60	16,496.00
029 Other Motions/Applications				
02-Sep-24	Analyze motion to unseal Committee conversion objection (.2); correspond with M. Russell regarding same (.1).	Lawrence, J. Alexander	0.30	480.00
02-Sep-24	Analyze draft CVI objection to motion to unseal (.1); comment on draft Committee joinder to same (.1); correspond with internal working group regarding same (.1).	Russell, Miranda K.	0.30	351.00
03-Sep-24	Correspond with Cole Schotz team regarding objection to motion to unseal (.1); revise same in advance of filing (.2).	Russell, Miranda K.	0.30	351.00
12-Sep-24	Correspond with M. Russell regarding dealer automatic stay motion.	Mannal, Doug	0.20	375.00

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Date	Services	Timekeeper	Hours	Value
12-Sep-24	Analyze motion for payment from creditor (.8); correspond with B. Dolphin (MNAT) (.3) and internal working group (.2) regarding same.	Yan, Donghao (Helen)	1.30	1,202.50
17-Sep-24	Analyze motion to extend removal period.	Yan, Donghao (Helen)	0.40	370.00
Total: 029 Other Motions/Applications			2.80	3,129.50
030 Schedules and Statements				
06-Sep-24	Analyze global notes to schedules and statements (.5); correspond with M3 team regarding same (.1).	Russell, Miranda K.	0.60	702.00
Total: 030 Schedules and Statements			0.60	702.00
031 Insurance				
02-Aug-24	Call (.2) and correspond (.1) with B. Butterfield regarding availability of insurance limits; analyze policy regarding priority of payment (.4).	Schaaf, Kathleen E.	0.70	1,137.50
12-Aug-24	Correspond with D. Mannal regarding insurance inquiry (.1); call with D. Mannal and H. Yan regarding same (.4); analyze proposed footnote in settlement term sheet regarding D&O insurance (.2); analyze same (.1) and policy language (.1) in connection with cooperation inquiry; correspond with D. Mannal regarding same (.1).	Schaaf, Kathleen E.	1.00	1,625.00
06-Sep-24	Correspond with M. Russell regarding insurance matters (.1); analyze draft plan (.2) and policy (.1); correspond with M. Russell regarding same (.3); analyze correspondence from M Russell to B. Butterfield regarding insurance matters (.1); analyze correspondence from B. Butterfield regarding insurance matters (.1); correspond with M. Russell regarding insurance-related definitions in plan (.2).	Schaaf, Kathleen E.	1.10	1,787.50
09-Sep-24	Analyze correspondence from M. Russell regarding insurance provisions in plan (.2); analyze plan (.3); correspond with M. Russell regarding same (.2).	Schaaf, Kathleen E.	0.70	1,137.50
10-Sep-24	Correspond with M. Russell regarding insurance provisions in plan.	Schaaf, Kathleen E.	0.30	487.50
12-Sep-24	Call with Debtors regarding advancement of D&O defense costs.	Butterfield, Benjamin	0.30	420.00
13-Sep-24	Correspond with internal working group regarding insurance provisions in plan.	Schaaf, Kathleen E.	0.40	650.00
16-Sep-24	Prepare for (.1) and participate on (.4) call with internal working group regarding insurance matters in connection with plan.	Butterfield, Benjamin	0.50	700.00
16-Sep-24	Conduct legal research regarding D&O claims.	Guido, Laura	0.60	300.00
16-Sep-24	Prepare for (.2) and participate on (.4) call with internal working group regarding insurance matters in connection with plan.	Mannal, Doug	0.60	1,125.00
16-Sep-24	Participate on call (.4) and correspond (.1) with internal working group regarding insurance matters in connection with plan.	Russell, Miranda K.	0.50	585.00

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Date	Services	Timekeeper	Hours	Value
16-Sep-24	Participate on call with internal working group regarding insurance matters in connection with plan (.4); analyze correspondence from M. Russell regarding same (.1).	Schaaf, Kathleen E.	0.50	812.50
17-Sep-24	Analyze revised plan documents in connection with insurance matters.	Schaaf, Kathleen E.	0.40	650.00
19-Sep-24	Analyze revised plan documents in connection with insurance matters.	Schaaf, Kathleen E.	0.30	487.50
24-Sep-24	Correspond with K. Schaaf regarding D&O insurance advance motion.	Russell, Miranda K.	0.10	117.00
24-Sep-24	Analyze correspondence (.1) and documents (.2) from M. Russell regarding D&O advance motion; analyze D&O advance motion (.3); analyze legal research regarding release (.4).	Schaaf, Kathleen E.	1.00	1,625.00
25-Sep-24	Analyze motion to advance D&O policy proceeds.	Butterfield, Benjamin	0.50	700.00
25-Sep-24	Analyze D&O advance motion (.2); call with K. Schaaf regarding same (.2); comment on order regarding same (.1); correspond with D. Mannal and B. Butterfield regarding same (.1).	Russell, Miranda K.	0.60	702.00
25-Sep-24	Call with M. Russell regarding D&O advance motion.	Schaaf, Kathleen E.	0.40	650.00
26-Sep-24	Correspond with B. Dolphin (MNAT) regarding comments to D&O advance motion.	Russell, Miranda K.	0.20	234.00
29-Sep-24	Correspond with internal working group and U.S. Trustee regarding U.S. Trustee's inquiry regarding Debtors' insurance motion regarding defense costs (.2); analyze same (.3).	Mannal, Doug	0.50	937.50
29-Sep-24	Correspond with B. Dolphin (MNAT) regarding D&O insurer advance motion and additional comments regarding same.	Russell, Miranda K.	0.20	234.00
30-Sep-24	Analyze motion to advance D&O policy proceeds (.1); comment on proposed order (.1); calls with M. Russell and D. Mannal regarding D&O insurance motion and order (.6).	Butterfield, Benjamin	0.80	1,120.00
30-Sep-24	Prepare for (.3) and participate on (.3) call with U.S. Trustees regarding Debtors motion seeking access to insurance funds for insiders; calls with M. Russell and B. Butterfield regarding D&O insurance motion and order (.6).	Mannal, Doug	1.30	2,437.50
30-Sep-24	Correspond with DPW and internal working group regarding D&O insurance motion and order (.3); further revise same (.7); calls with D. Mannal and B. Butterfield regarding same (.6).	Russell, Miranda K.	1.60	1,872.00
Total: 031 Insurance			15.10	22,534.00
032 Time Entry Review				
01-Sep-24	Analyze August time entries for compliance with U.S. Trustee's guidelines (3.0); correspond with M. Russell regarding comments in connection with same (.3).	Murphy, Joseph	3.30	3,283.50
02-Sep-24	Analyze August time entries for compliance with U.S. Trustee's guidelines.	Russell, Miranda K.	1.10	1,287.00

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05-Sep-24	Analyze revised August time entries for compliance with U.S. Trustee's guidelines (.2); correspond with J. Murphy regarding same (.1).	Russell, Miranda K.	0.30	351.00
06-Sep-24	Analyze revised August time entries for compliance with U.S. Trustee's guidelines (.4); correspond with J. Murphy regarding same (.1).	Russell, Miranda K.	0.50	585.00
09-Sep-24	Analyze revised August time entries for compliance with U.S. Trustee's guidelines.	Murphy, Joseph	0.90	895.50
09-Sep-24	Analyze revised August time entries for compliance with U.S. Trustee's guidelines (.2); correspond with J. Murphy regarding same (.1).	Russell, Miranda K.	0.30	351.00
10-Sep-24	Analyze revised drafts of August time entries for compliance with U.S. Trustee's guidelines.	Murphy, Joseph	0.40	398.00
17-Sep-24	Analyze (.3) and comment on (.2) August time entries for compliance with U.S. Trustee's guidelines.	Mannal, Doug	0.50	937.50
Total: 032 Time Entry Review			7.30	8,088.50
Total Discount				(14,032.25)
			Current Fees	\$344,053.75

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No.	Timekeeper	Hours	Rate	Value
26707	Mannal, Doug	71.00	1,875.00	133,125.00
07476	Lawrence, J. Alexander	0.90	1,600.00	1,440.00
24305	Sturgeon, Dave B.	1.50	1,500.00	2,250.00
20018	Butterfield, Benjamin	66.10	1,400.00	92,540.00
23247	Jaworskyj, Philip S.	4.10	1,295.00	5,309.50
23754	Russell, Miranda K.	57.30	1,170.00	67,041.00
26524	Murphy, Joseph	5.60	995.00	5,572.00
25856	Smolarski, Darren	0.60	995.00	597.00
26891	Yan, Donghao (Helen)	36.10	925.00	33,392.50
12984	Schaaf, Kathleen E.	6.80	1,625.00	11,050.00
13849	Guido, Laura	5.10	500.00	2,550.00
26914	Coffey, Cameron Tower	8.70	370.00	3,219.00
	Total Discount			(14,032.25)
	Total	263.80		\$344,053.75

Task Code Summary

Task Code	Description	Hours	Value
002	Asset Disposition	1.50	2,742.00
003	Assumption and Rejection of Leases and Contracts	0.30	351.00
005	Budgeting (Case)	0.80	838.00
006	Business Operations	0.20	234.00
007	Case Administration	20.10	19,727.50
008	Claims Administration and Objections	5.30	7,657.50
011	Employment and Fee Applications	14.50	15,370.50
013	Financing and Cash Collateral	0.50	487.00
015	Meetings and Communications with Creditors	25.20	32,584.50
016	Non-Working Travel	7.10	11,887.50
017	Plan and Disclosure Statement	142.20	206,410.00
021	Tax	6.70	8,846.50
024	Hearings	13.60	16,496.00
029	Other Motions/Applications	2.80	3,129.50
030	Schedules and Statements	0.60	702.00
031	Insurance	15.10	22,534.00
032	Time Entry Review	7.30	8,088.50
	Total Discount		(14,032.25)
	Total	263.80	\$344,053.75

MORRISON FOERSTER034024-0000001
BANKRUPTCYInvoice Number: 6365155
Invoice Date: October 24, 2024**Disbursement Detail**

Date	Description	Value
18-Jul-24	Search fees, Cogency Global INC, Lien Search	80.57
08-Sep-24	Travel, train, D. Mannal, travel to/from Delaware for hearing, 9/9/24	323.00
09-Sep-24	Travel, taxi/car service, B. Butterfield, ground travel from train to courthouse in Delaware for hearing, 9/9/24	9.90
09-Sep-24	Travel, train, B. Butterfield, travel to/from Delaware for hearing, 9/9/24	396.00
09-Sep-24	Travel, meals, B, Butterfield, other, in Delaware for hearing, 9/9/24	21.90
09-Sep-24	Travel, parking, B. Butterfield, in Delaware for hearing, 9/9/24	23.00
09-Sep-24	Travel, parking, D. Mannal, in Delaware for hearing, 9/9/24	8.00
11-Sep-24	EDiscovery, Epiq Managed Services, August 2024	940.83
17-Sep-24	Delivery Fees, Deluxe Delivery Systems, INC.- W2220060	17.02
19-Sep-24	Delivery Fees, Deluxe Delivery Systems, INC.- W2223077	17.02
30-Sep-24	On-line Research - OTHER DATABASE	109.24
30-Sep-24	On-line Research - WESTLAW	256.20
	Total	\$2,202.68

MORRISON FOERSTER034024-0000001
BANKRUPTCYInvoice Number: 6365155
Invoice Date: October 24, 2024**Prior Open Invoices**

For your convenience, we have listed below previous invoices on this matter that remain outstanding at this time according to our records. If you have already submitted payment, we appreciate your promptness. Should you note any discrepancies or if we can provide additional assistance, please call our Client Accounting team at (415) 268-6446 or (866) 314-5320.

Date	Invoice Number	Currency	Original Invoice Amount	Payments Applied	Amount Outstanding
30-Aug-24	6350200	USD	1,931,885.08	(1,917,493.00)	14,392.08
24-Sep-24	6355864	USD	455,560.02	0.00	455,560.02
Total Prior Open Invoices					\$469,952.10

MORRISON FOERSTER

P.O. BOX 742335
LOS ANGELES, CA 90074-2335

MORRISON & FOERSTER LLP

AUSTIN, BERLIN, BOSTON,
BRUSSELS, DENVER, HONG KONG,
LONDON, LOS ANGELES, MIAMI,
NEW YORK, PALO ALTO, SAN DIEGO,
SAN FRANCISCO, SHANGHAI,
SINGAPORE, TOKYO, WASHINGTON, D.C.

INVOICE

TELEPHONE: 01 415.268.7000
FACSIMILE: 01 415.268.7522

WWW.MOFO.COM

Fisker Inc.
14 Centerpointe Drive
La Palma, CA 90623
CA
UNITED STATES

Taxpayer ID #: [REDACTED]
Invoice Number: 6365155
Invoice Date: October 24, 2024

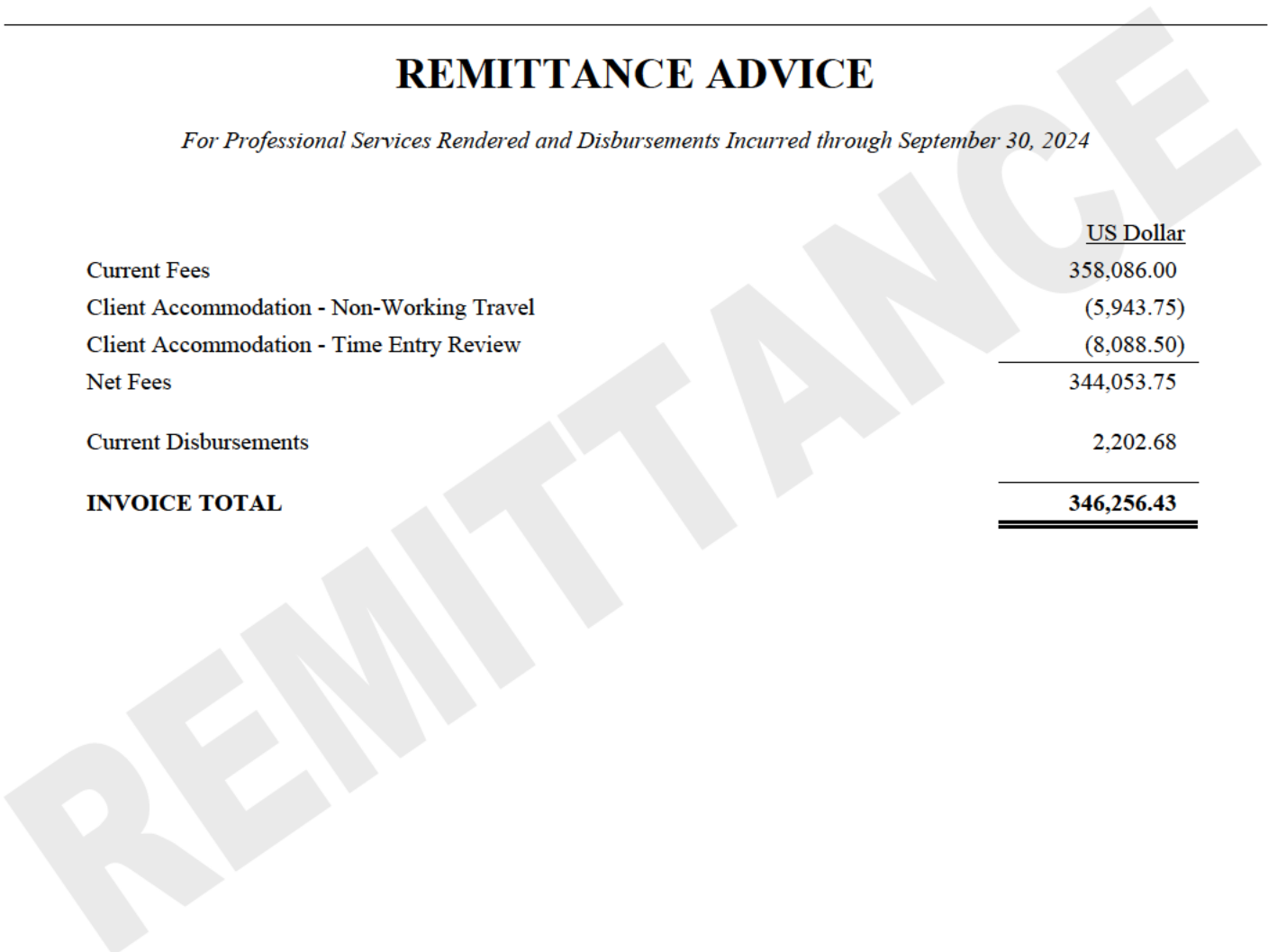
Client/Matter Number: 034024-0000001
Billing Atty: DOUG MANNAL

Matter Name: BANKRUPTCY

REMITTANCE ADVICE

For Professional Services Rendered and Disbursements Incurred through September 30, 2024

	<u>US Dollar</u>
Current Fees	358,086.00
Client Accommodation - Non-Working Travel	(5,943.75)
Client Accommodation - Time Entry Review	(8,088.50)
Net Fees	<u>344,053.75</u>
Current Disbursements	2,202.68
INVOICE TOTAL	<u><u>346,256.43</u></u>



[REDACTED]

**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)

Obj. Deadline: November 8, 2024 at 4:00 p.m. (ET)

**DECLARATION OF DOUG MANNAL REGARDING THIRD MONTHLY FEE
APPLICATION OF MORRISON & FOERSTER LLP AS COUNSEL TO THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF FISKER INC., ET AL.,
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

I, Doug Mannal, declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury:

1. I am a partner with the law firm of Morrison & Foerster LLP (“Morrison & Foerster”), with offices at 250 West 55th Street, New York, New York 10019, among other locations. I am an attorney duly admitted and in good standing to practice before the Bar of the State of New York. There are no disciplinary proceedings pending against me.

2. I have personally performed many of the legal services rendered by Morrison & Foerster, as counsel for the Official Committee of Unsecured Creditors (the “Committee”) of Fisker Inc., *et al.* (the “Debtors”), and am familiar with all other work performed on behalf of the Committee by the lawyers and paraprofessionals in the firm.

3. I have reviewed the foregoing Monthly Fee Application, and the facts set forth therein are true and correct to the best of my knowledge, information, and belief. Moreover, I have

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.

reviewed Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware and submit that the Monthly Fee Application complies with such Rule.

4. No agreement or understanding exists between Morrison & Foerster and any other person for the sharing of compensation received or to be received for services rendered in or in connection with these cases.

I certify, under penalty of perjury, that the foregoing statements made by me are true to the best of my knowledge, information, and belief.

Dated: October 25, 2024

/s/ Doug Mannal
Doug Mannal