

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

In re

FISKER INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

**Obj. Deadline:** November 20, 2024 at 4:00 p.m. (ET)

**FOURTH MONTHLY FEE STATEMENT OF DAVIS POLK & WARDWELL  
LLP, AS BANKRUPTCY COUNSEL FOR THE DEBTORS AND DEBTORS IN  
POSSESSION, FOR ALLOWANCE OF MONTHLY COMPENSATION AND  
FOR REIMBURSEMENT OF ALL ACTUAL AND NECESSARY  
EXPENSES INCURRED FOR THE PERIOD  
SEPTEMBER 1, 2024 THROUGH AND INCLUDING SEPTEMBER 30, 2024**

Name of Professional: DAVIS POLK & WARDWELL LLP

Authorized to Provide  
Professional Services to: Debtors and Debtors in Possession

Date of Retention: July 15, 2024, *nunc pro tunc* to June 17, 2024

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<sup>1</sup> 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.



241139024110600000000004

Period for which compensation and reimbursement is sought: September 1, 2024 through and including September 30, 2024<sup>2</sup>

Amount of compensation sought as actual, reasonable and necessary: \$892,859.20 (80% of \$1,116,074.00)

Amount of reimbursement sought as actual, reasonable and necessary: \$10,897.64

This is a  x  monthly   interim   final application

The total time expended for this fee statement preparation is approximately 25 hours and the corresponding compensation requested is approximately \$25,443.00.<sup>3</sup>

If this is not the first fee statement filed, disclose the following for each prior fee statement:

<b>DATE FILED</b>	<b>PERIOD COVERED</b>	<b>REQUESTED FEES/EXPENSES</b>	<b>APPROVED FEES/EXPENSES</b>
8/2/2024 [D.I. 372]	6/17/24 – 6/30/24	\$814,926.40 / \$4,448.20	Pending
8/2/2024 [D.I. 374]	7/1/24 – 7/31/24	\$2,176,836.80 / \$11,538.14	Pending
9/25/2024 [D.I. 595]	8/1/24 – 8/31/24	\$1,082,401.40 / \$10,495.79	Pending

<sup>2</sup> This Fee Statement includes certain expenses of Davis Polk & Wardwell LLP that were not included in the *First Monthly Fee Statement of Davis Polk & Wardwell LLP, as Bankruptcy Counsel for the Debtors and Debtors in Possession, for Allowance of Monthly Compensation and for Reimbursement of all Actual and Necessary Expenses Incurred for the Period June 17, 2024 through and Including June 30, 2024* [D.I. 372] filed on August 2, 2024, the *Second Monthly Fee Statement of Davis Polk & Wardwell LLP, as Bankruptcy Counsel for the Debtors and Debtors in Possession, for Allowance of Monthly Compensation and for Reimbursement of all Actual and Necessary Expenses Incurred for the Period July 1, 2024 through and Including July 31, 2024* [D.I. 374] filed on August 2, 2024, and/or the *Third Monthly Fee Statement of Davis Polk & Wardwell LLP, as Bankruptcy Counsel for the Debtors and Debtors in Possession, for Allowance of Monthly Compensation and for Reimbursement of all Actual and Necessary Expenses Incurred for the Period August 1, 2024 through and Including August 31, 2024* [D.I. 595] filed on September 25, 2024.

<sup>3</sup> Allowance for compensation for all such time is not requested in this fee statement and certain of such compensation will be sought in a subsequent fee statement.

**COMPENSATION BY PROFESSIONAL****FIKER INC., et al.**  
**(Case No. 24-11390 (TMH))****September 1, 2024 through September 30, 2024**

<b>Name of Professional</b>	<b>Position of the Applicant, Area of Expertise, Number of Years in that Position, Year of Obtaining License to Practice</b>	<b>Hourly Billing Rate<sup>4</sup></b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
<b>Partners</b>				
Robert A. Cohen	Partner/Litigation. Partner since 2019. Joined the firm as a partner in 2021. Member of the NY Bar since 1998.	2,375	2.6	\$6,175.00
Corey M. Goodman	Partner/Tax. Partner since 2021. Joined the firm as a partner in 2021. Member of the NY Bar since 2008.	2,375	0.4	\$950.00
James I. McClammy	Partner/Civil Litigation. Partner since 2015. Joined the firm as an associate in 2000. Member of NY Bar since 1999.	2,375	44.6	\$105,925.00
Brian M. Resnick	Partner/Restructuring. Partner since 2011. Joined the firm as an associate in 2003. Member of the NY Bar since 2004.	2,375	94.9	\$225,387.50
Pritesh P. Shah	Partner/Intellectual Property. Partner since 2015. Joined the firm as an associate in 2008. Member of NY Bar since 2009.	2,375	2.9	\$6,887.50
<b>Counsels</b>				
Mikaela Dealissia	Counsel/Intellectual Property. Joined the firm as an associate in 2017. Member of the NY Bar since 2018.	1,725	4.0	\$6,900.00
Tracy L. Matlock	Counsel/Tax. Joined the firm as an associate in 2011. Member of the NY Bar since 2013.	1,830	12.7	\$23,241.00

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<sup>4</sup> The hourly billing rate for non-working travel time has been adjusted to 50% of the normal rates.

<b>Name of Professional</b>	<b>Position of the Applicant, Area of Expertise, Number of Years in that Position, Year of Obtaining License to Practice</b>	<b>Hourly Billing Rate<sup>4</sup></b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
<b>Associates</b>				
James Butler	Associate/Litigation. Joined the firm in 2019. Member of the NY Bar since 2021.	1,590	9.1	\$14,469.00
Chen Chen	Associate/Litigation. Joined the firm in 2018. Member of the NY Bar since 2020.	1,590	16.1	\$25,599.00
Nicholas D'Angelo	Associate/Civil Litigation. Joined the firm in 2017. Member of the NY Bar since 2017.	1,590	56.1	\$89,199.00
Georgianna Eck	Associate/Tax. Joined the firm in 2023. Member of NY Bar since 2024.	965	9.3	\$8,974.50
Amber Leary	Associate/Restructuring. Joined the firm in 2019. Member of the NY Bar since 2020.	1,590	47.8	\$76,002.00
Michael G. Mills	Associate/Litigation. Joined the firm in 2021. Member of the NY Bar since 2022.	1,490	3.9	\$5,811.00
Samira Paydar	Associate/Litigation. Joined the firm in 2016. Member of the NY Bar since 2017.	1,590	25.4	\$40,386.00
Richard J. Steinberg	Associate/Restructuring. Joined the firm in 2019. Member of the NY Bar since 2019.	1,590	226.7	\$360,453.00
Tony Sun	Associate/Restructuring. Joined the firm in 2023. Member of the NY Bar since 2024.	965	5.2	\$5,018.00
Kevin L. Winiarski	Associate/Restructuring. Joined the firm in 2023. Member of the NY Bar since 2024.	965	48.1	\$46,416.50

<b>Name of Professional</b>	<b>Position of the Applicant, Area of Expertise, Number of Years in that Position, Year of Obtaining License to Practice</b>	<b>Hourly Billing Rate<sup>4</sup></b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Yueyu Yang	Associate/Tax. Joined the firm in 2020. Member of the NY Bar since 2021.	1,570	6.0	\$9,420.00
Kayleigh Yerdon	Associate/Restructuring. Joined the firm in 2020. Member of the NY Bar since 2022.	1,490	6.1	\$9,089.00
<b>Legal Assistants / Law Graduates / Librarians / Discovery Team</b>				
Eric Bae	Law graduate/Not yet admitted	695	35.9	\$24,950.50
Magali Giddens	Legal Assistant	650	17.5	\$11,375.00
Will Graves	Legal Assistant	460	0.4	\$184.00
Jonathan H. Lewis	Discovery Attorney	1,190	5.7	\$6,783.00
David Nestor	eDiscovery Project Manager	1,590	0.7	\$1,113.00
Adam Pravda	eDiscovery Project Manager	760	2.1	\$1,596.00
Marjorie Richmond	Librarian	745	0.3	\$223.50
Susan Soussan	eDiscovery Project Manager	690	0.9	\$621.00
Kelsey D. Stevens	Legal Assistant	650	0.5	\$325.00
Eric N. Wagner	Legal Assistant	650	4.0	\$2,600.00
<b>Total</b>		<b>1,617.73</b>	<b>689.9</b>	<b>\$1,116,074.00</b>
<b>BLENDED RATE: \$1,617.73</b>				
<b>ATTORNEY BLENDED RATE: \$1,714.59</b>				

**COMPENSATION BY PROJECT CATEGORY**

**FISKER INC., et al.**  
**(Case No. 24-11390 (TMH))**

**September 1, 2024 through September 30, 2024**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Asset Dispositions	49.5	\$89,379.00
Business Operations	8.8	\$11,844.00
Claims / Creditor Outreach	23.1	\$34,739.50
Contracts / Leases	5.4	\$8,586.00
Corporate Governance / Board Matters / Communications	4.1	\$8,560.00
Cross-Border Issues	32.9	\$67,775.50
Employee and Labor	0.5	\$1,187.50
General Case Administration	58.1	\$82,973.50
Hearing Preparation / Attendance	79.7	\$136,761.50
Litigation	163.3	\$274,893.00
Plan / Disclosure Statement / Confirmation	192.7	\$321,434.00
Regulatory / Antitrust / IP	27.3	\$40,354.50
Retention DPW: Preparation of Fee Applications, Budgeting	42.6	\$34,483.50
Travel (Non-Working) (50%)	1.9	\$3,102.50
<b>TOTAL</b>	<b>689.9</b>	<b>\$1,116,074.00</b>

**EXPENSE SUMMARY****FISKER INC., et al.**  
**(Case No. 24-11390 (TMH))****September 1, 2024 through September 30, 2024**

<b>Expense Category</b>	<b>Total Expenses</b>
Computer Research (Westlaw/Lexis)	\$1,359.23
Court and Related Fees	\$259.50
Duplication	\$536.20
Filing, Registration, Fees & Taxes	\$155.26
Litigation Support	\$1,407.60
Meals	\$223.12
Outside Documents & Research	\$1.57
Postage, Courier & Freight	\$217.02
Travel	\$6,738.14
<b>Grand Total Expenses</b>	<b>\$10,897.64</b>

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

In re

FISKER INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

**Obj. Deadline:** November 20, 2024 at 4:00 p.m. (ET)

**FOURTH MONTHLY FEE STATEMENT OF  
DAVIS POLK & WARDWELL LLP, AS BANKRUPTCY COUNSEL  
FOR THE DEBTORS AND DEBTORS IN POSSESSION, FOR ALLOWANCE  
OF MONTHLY COMPENSATION AND FOR REIMBURSEMENT OF ALL  
ACTUAL AND NECESSARY EXPENSES INCURRED FOR THE PERIOD  
SEPTEMBER 1, 2024 THROUGH AND INCLUDING SEPTEMBER 30, 2024<sup>2</sup>**

Davis Polk & Wardwell LLP (“Davis Polk”), as bankruptcy counsel for the debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned cases (the “Chapter 11 Cases”) submits this fee statement (the “Fee Statement”) for monthly and interim allowance of compensation for professional services rendered by Davis Polk to the Debtors for the period of September 1, 2024 through and including September 30, 2024 (the “Statement Period”), and

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<sup>1</sup> 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.

<sup>2</sup> This Fee Statement includes certain expenses of Davis Polk & Wardwell LLP that were not included in the *First Monthly Fee Statement of Davis Polk & Wardwell LLP, as Bankruptcy Counsel for the Debtors and Debtors in Possession, for Allowance of Monthly Compensation and for Reimbursement of all Actual and Necessary Expenses Incurred for the Period June 17, 2024 through and Including June 30, 2024* [D.I. 372] filed on August 2, 2024, the *Second Monthly Fee Statement of Davis Polk & Wardwell LLP, as Bankruptcy Counsel for the Debtors and Debtors in Possession, for Allowance of Monthly Compensation and for Reimbursement of all Actual and Necessary Expenses Incurred for the Period July 1, 2024 through and Including July 31, 2024* [D.I. 374] filed on August 2, 2024, and/or the *Third Monthly Fee Statement of Davis Polk & Wardwell LLP, as Bankruptcy Counsel for the Debtors and Debtors in Possession, for Allowance of Monthly Compensation and for Reimbursement of all Actual and Necessary Expenses Incurred for the Period August 1, 2024 through and Including August 31, 2024* [D.I. 595] filed on September 25, 2024.



reimbursement of actual and necessary expenses incurred by Davis Polk during the Statement Period pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), rule 2016-2 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, effective as of November 1, 2013 (the “U.S. Trustee Guidelines”) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [D.I. 350] (the “Interim Compensation Procedures Order”).<sup>3</sup> In support of this Fee Statement, Davis Polk represents as follows:

### **JURISDICTION**

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction over this Fee Statement pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested herein are sections 330 and 331 of the Bankruptcy Code, as supplemented by Bankruptcy Rule 2016, Local Rule 2016-2, the U.S. Trustee Guidelines, and the Interim Compensation Procedures Order.

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<sup>3</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Interim Compensation Procedures Order.

### **BACKGROUND**

3. On June 17, 2024 (the “Original Petition Date”), Fisker Group, Inc. filed a voluntary petition under chapter 11 of the Bankruptcy Code with the Court. On June 19, 2024 (the “Subsequent Petition Date” and, together with the Original Petition Date, the “Petition Date”),<sup>4</sup> the other Debtors also filed voluntary petitions under chapter 11 of the Bankruptcy Code with the Court. The Debtors have continued in the management and operation of their business and property as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Chapter 11 Cases.

4. On July 2, 2024, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an Official Committee of Unsecured Creditors (the “Creditors”) pursuant to section 1102 of the Bankruptcy Code (the “Committee”). *See Not. of Appointment of Comm. of Unsecured Creditors* [D.I. 106].

### **DAVIS POLK’S RETENTION**

5. Prior to the commencement of these Chapter 11 Cases, the Debtors retained Davis Polk to provide advice regarding, among other things, preparing for, commencing, and prosecuting the Chapter 11 Cases. On June 25, 2024, the Debtors filed 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. 74] (the “Davis Polk Retention Application”).

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<sup>4</sup> With respect to each Debtor, references to the Petition Date shall mean the applicable Petition Date for such Debtor.

6. On July 15, 2024, the Court granted the Davis Polk Retention Application pursuant to the *Order Approving 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. 216].

**INTERIM COMPENSATION PROCEDURES ORDER**

7. The Court entered the Interim Compensation Procedures Order on July 31, 2024. The Interim Compensation Procedures Order sets forth the procedures for interim compensation and reimbursement of expenses for Retained Professionals in the Chapter 11 Cases.

8. In particular, the Interim Compensation Procedures Order provides that Retained Professionals may file and serve a Monthly Fee Statement following the month or months for which compensation and/or reimbursement is sought. In accordance with the Interim Compensation Procedures Order, if any of the Compensation Notice Parties wishes to object to a Retained Professional's Monthly Fee Statement, the objecting party shall, within 14 days after delivery of the Monthly Fee Statement (the "Objection Deadline"), deliver, via email, a written notice upon the respective Retained Professional and each of the other Compensation Notice Parties (the "Notice of Objection to Monthly Fee Statement") setting forth with reasonable detail the nature of the objection and the amount at issue (the "Disputed Amount"). Thereafter, the objecting party and the Retained Professional shall attempt to resolve the objection on a consensual basis. If the parties reach an agreement, the Debtors shall promptly pay 80% of the agreed-upon fees and 100% of the agreed-upon expenses. If, however, the parties are unable to reach a resolution of the objection within 14 days after delivery of the Notice of Objection to Monthly Fee Statement (or such longer or shorter period as mutually agreed to by the Retained Professional and the objecting party), (i) the objecting party shall file its objection to the Disputed Amount (the "Objection") with the Court within three business days and serve such Objection on the respective

Retained Professional and each of the Compensation Notice Parties and (ii) the Debtors are authorized and directed to pay the Retained Professional the Monthly Fee Statement less the Disputed Amount. Thereafter, the Retained Professional must either (i) file with the Court a response to the Objection, together with a request for payment of the Disputed Amount, or (ii) forego payment of the Disputed Amount until the next fee application hearing, at which time the parties may request that the Court consider the Objection. Provided that no Notice of Objection to Monthly Fee Statement is served prior to the Objection Deadline or no Objections are filed, in each case, in accordance with the Interim Compensation Procedures Order, the Retained Professional may file a certificate of no objection (the "Certificate of No Objection") with the Court.

9. Upon the filing of a Certificate of No Objection, the Debtors are authorized to pay such Retained Professional 80 percent of the fees and 100 percent of the expenses requested in such Monthly Fee Statement.

**RELIEF REQUESTED**

10. Davis Polk submits this Fee Statement for (a) compensation of the actual, reasonable, and necessary professional services that it has rendered as counsel for the Debtors in the Chapter 11 Cases during the Statement Period and (b) reimbursement of actual, reasonable, and necessary expenses incurred by Davis Polk in representing the Debtors during the Statement Period.

11. During the Statement Period, Davis Polk incurred fees in the amount of \$1,116,074.00. For the same period, Davis Polk incurred actual, reasonable, and necessary expenses totaling \$10,897.64. As of the date of this Fee Statement, Davis Polk has received no payments with respect to these amounts.

12. Set forth on the foregoing “Compensation by Project Category” is a summary, by subject matter category, of the time expended to the Chapter 11 Cases by Davis Polk timekeepers during the Statement Period.

13. **Exhibit A** attached hereto contains logs, sorted by case project category, which show the time recorded by professionals, paraprofessionals, and other support staff, as well as descriptions of the services provided.

14. **Exhibit B** attached hereto contains a breakdown of actual, reasonable, and necessary expenses incurred by Davis Polk during the Statement Period.

15. Davis Polk charges \$0.15 per page for photocopying and printing.

16. In accordance with Local Rule 2016-2, Davis Polk has reduced its request for compensation for non-working travel, if any, to 50% of its normal rate.

17. Davis Polk has endeavored to represent the Debtors in the most expeditious and economical manner possible. Tasks have been assigned to attorneys, paralegals, and other support staff at Davis Polk so that work has been performed by those most familiar with the particular matter or task and, where attorney or paralegal involvement was required, by the lowest hourly rate professional appropriate for a particular matter. Moreover, Davis Polk has endeavored to coordinate with the other professionals involved in the Chapter 11 Cases to minimize any duplication of effort and to minimize attorneys’ fees and expenses to the Debtors. Davis Polk believes it has been successful in this regard.

18. No agreement or understanding exists between Davis Polk and any other person for the sharing of compensation received or to be received for services rendered in or in connection with the Chapter 11 Cases.

19. The undersigned has reviewed the requirements of Local Rule 2016-2 and certifies to the best of his or her information, knowledge, and belief that this Fee Statement complies with that Local Rule.

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WHEREFORE, Davis Polk respectfully requests that the Debtors pay Davis Polk \$903,756.84, which is equal to the sum of 80% (\$892,859.20) of Davis Polk's requested compensation (\$1,116,074.00) and 100% (\$10,897.64) of Davis Polk's requested expense reimbursement.

Dated: November 6, 2024  
New York, NY

**DAVIS POLK & WARDWELL LLP**

*/s/ Brian M. Resnick*

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Brian M. Resnick (admitted *pro hac vice*)  
Darren S. Klein (admitted *pro hac vice*)  
Richard J. Steinberg (admitted *pro hac vice*)  
Amber Leary (admitted *pro hac vice*)  
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Tel.: (212) 450-4000  
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richard.steinberg@davispolk.com  
amber.leary@davispolk.com

*Counsel to the Debtors and Debtors in Possession*

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

In re:

FISKER INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

**Obj. Deadline:** November 20, 2024 at 4:00 p.m. (ET)

**NOTICE OF FILING OF FEE STATEMENT**

**PLEASE TAKE NOTICE** that, contemporaneously herewith, Davis Polk & Wardwell LLP filed the attached *Fourth Monthly Fee Statement of Davis Polk & Wardwell LLP, as Bankruptcy Counsel for the Debtors and Debtors in Possession, for Allowance of Monthly Compensation and for Reimbursement of all Actual and Necessary Expenses Incurred for the Period September 1, 2024, through and Including September 30, 2024* (the “Fee Statement”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).<sup>2</sup>

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Fee Statement must be made in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [D.I. 350] (the “Interim Compensation Procedures Order”) and notice of any such objection must be provided in accordance with the Interim Compensation Procedures Order by no later than **November 20, 2024 at 4:00 p.m.**

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<sup>1</sup> 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.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Fee Statement.



**(Eastern Time)** (the “Objection Deadline”) upon on the following parties: (a) the Debtors, c/o Fisker Inc., 14 Centerpointe Drive, La Palma, CA 90623 (Attn: Matthew J. Dundon, md@dundon.com, and John C. DiDonato, jdidonato@hcg.com); (b) counsel to the Debtors, (i) 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; Richard J. Steinberg, Esq., richard.steinberg@davispolk.com; and Amber Leary, Esq., amber.leary@davispolk.com) and (ii) Morris Nichols Arsht & Tunnell LLP, 1201 North Market Street, 16th Floor, Wilmington, DE 19801 (Attn: Robert J. Dehney, Sr., Esq., rdehney@morrisonichols.com; Andrew R. Remming, Esq., aremring@morrisonichols.com; Brenna A. Dolphin, Esq., bdolphin@morrisonichols.com; Sophie Rogers Churchill, Esq., srchurchill@morrisonichols.com); (c) counsel to the Committee, (i) 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 (ii) Cole Schotz, P.C., 500 Delaware Avenue, Suite 1410, Wilmington, DE 19801 (Attn: Justin R. Alberto, Esq., jalberto@coleschotz.com); and (d) 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 Malcolm M. Bates, Esq., malcolm.m.bates@usdoj.gov).

**PLEASE TAKE FURTHER NOTICE** that if no objections to the Fee Statement are served prior to the Objection Deadline, the Retained Professional may file a Certificate of No Objection with the Court, after which the Debtors shall be authorized by the Interim Compensation Procedures Order to pay the Retained Professional an amount equal to 80% of the fees and 100% of the expenses requested in the Fee Statement without the need for further order of the Court.

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Fee Statement will be held only if an objection is timely served and filed in accordance with the Interim Compensation Procedures Order, or if the Court directs otherwise, at a date and time to be scheduled before the Honorable Thomas M. Horan, United States Bankruptcy Court Judge, in the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd floor, Wilmington, Delaware 19801.

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Dated: November 6, 2024  
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Sophie Rogers Churchill  
Robert J. Dehney, Sr. (No. 3578)  
Andrew R. Remming (No. 5120)  
Brenna A. Dolphin (No. 5604)  
Sophie Rogers Churchill (No. 6905)  
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-and-

DAVIS POLK & WARDWELL LLP

Brian M. Resnick (admitted *pro hac vice*)  
Darren S. Klein (admitted *pro hac vice*)  
Richard J. Steinberg (admitted *pro hac vice*)  
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amber.leary@davispolk.com

*Counsel to the Debtors and Debtors in Possession*

**EXHIBIT A****COMPENSATION BY PROJECT CATEGORY****FISKER INC., *et al.*****(Case No. 24-11390 (TMH))****September 1, 2024 through September 30, 2024**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
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Claims / Creditor Outreach	23.1	\$34,739.50
Contracts / Leases	5.4	\$8,586.00
Corporate Governance / Board Matters / Communications	4.1	\$8,560.00
Cross-Border Issues	32.9	\$67,775.50
Employee and Labor	0.5	\$1,187.50
General Case Administration	58.1	\$82,973.50
Hearing Preparation / Attendance	79.7	\$136,761.50
Litigation	163.3	\$274,893.00
Plan / Disclosure Statement / Confirmation	192.7	\$321,434.00
Regulatory / Antitrust / IP	27.3	\$40,354.50
Retention DPW: Preparation of Fee Applications, Budgeting	42.6	\$34,483.50
Travel (Non-Working) (50%)	1.9	\$3,102.50
<b>TOTAL</b>	<b>689.9</b>	<b>\$1,116,074.00</b>

Time Detail By Project			
Name	Date	Hours	Narrative
<b>BC02 Asset Dispositions</b>			
Bae, Eric	09/03/24	2.0	Review and analyze amendments to Fisker Finance licensing agreement and draft summary of changes.
Steinberg, Richard J.	09/03/24	1.0	Call with Huron regarding fleet sale (0.6); emails with Davis Polk team regarding Fisker Finance license (0.4).
Resnick, Brian M.	09/04/24	0.4	Emails regarding American Lease and Fisker Owners Association issues (0.2); discuss same with R. Steinberg (0.2).
Bae, Eric	09/05/24	1.7	Review and analyze intellectual property license issues and analyze de minimis sales procedure.
Resnick, Brian M.	09/05/24	0.5	Emails and calls regarding various American Lease and Fisker-Association owner issues.
Steinberg, Richard J.	09/05/24	5.0	Prepare for and attend call with American Lease, American Lease counsel, and Huron regarding amended fleet sale (0.8); call with Department of Justice regarding same (0.4); email to Huron regarding same (0.5); calls with B. Resnick regarding same (0.2); attend to information distribution to Fisker Owners Association, including confidentiality issues (1.1); draft second amendment to fleet sale order (1.6); emails with parties regarding same (0.4).
Steinberg, Richard J.	09/06/24	0.8	Draft email to Department of Justice regarding fleet sale issues.
Resnick, Brian M.	09/11/24	1.0	Calls with J. Dubel, C. MacGillivray and Huron regarding asset sale issues.
Steinberg, Richard J.	09/11/24	0.8	Call with J. Dubel, Fisker, and Huron regarding asset sale issues (0.8); Call with HCG regarding Adesa (0.4); email to J. McClammy and N. D'Angelo regarding same (0.4); review motion filed by Fisker Indianapolis (0.5); review revised unsealing order (0.3).
Steinberg, Richard J.	09/11/24	1.6	Call with HCG regarding Adesa (0.4); email to J. McClammy and N. D'Angelo regarding same (0.4); review motion filed by Fisker Indianapolis (0.5); review revised unsealing order (0.3)
Steinberg, Richard J.	09/12/24	1.6	Emails with Huron and Fisker regarding asset sales (0.5); call with Fisker regarding same (0.8); review orders regarding same (0.3).
Bae, Eric	09/13/24	0.5	Attend meeting with Davis Polk team regarding asset sale intellectual property issues and coordinate same.
Dealissia, Mikaela	09/13/24	0.7	Correspondence with Davis Polk team regarding transfer of personal data.
Resnick, Brian M.	09/13/24	2.0	Legal team call regarding asset sales and other business issues (0.8); discuss same with R. Steinberg (0.2); calls with Uzzi & Lall and J. Dubel regarding intellectual property sale (1.0).
Shah, Pritesh P.	09/13/24	0.6	Attend to questions regarding data privacy compliance in connection with American Lease sale.
Steinberg, Richard J.	09/13/24	1.9	Call with White & Case, Uzzi & Lall, J. Dubel, and Huron regarding intellectual property (0.6); call with Huron regarding fleet sale update (0.7); calls with Fisker regarding same (0.6).
Dealissia, Mikaela	09/16/24	0.4	Review revised plan and call with Fisker regarding data transfers.
Resnick, Brian M.	09/16/24	0.6	Call with Fisker Owners Association regarding status.
Shah, Pritesh P.	09/16/24	0.2	Review and revise Fisker liquidation plan.
Dealissia, Mikaela	09/17/24	0.7	Call with Fisker regarding data transfers (0.5); correspondence with Davis Polk team regarding trust agreement (0.2).

## Time Detail By Project

Name	Date	Hours	Narrative
Resnick, Brian M.	09/17/24	0.8	Call with Huron and Fisker regarding NHTSA issues.
Shah, Pritesh P.	09/17/24	0.9	Attend to questions regarding data transfer restrictions and review trust agreement (0.9).
Yerdon, Kayleigh	09/17/24	0.8	Various correspondence and call with Fisker regarding IP issues.
Dealissia, Mikaela	09/18/24	1.2	Review and revise Liquidating Trust Agreement.
Resnick, Brian M.	09/18/24	0.4	Discuss various sale and Fisker Owners Association matters with R. Steinberg (0.2); call with C. MacGillivray regarding same (0.2).
Shah, Pritesh P.	09/18/24	0.8	Review and revise Liquidating Trust Agreement.
Steinberg, Richard J.	09/20/24	0.9	Emails with Huron regarding fleet sale agreement (0.7); emails with L. Singer and D. Rothman regarding same (0.2).
Dealissia, Mikaela	09/23/24	0.6	Review and revise Liquidating Trust Agreement.
Resnick, Brian M.	09/23/24	1.5	Emails and calls with Huron, Fisker and Davis Polk team regarding American Lease and Fisker Owners Association issues.
Shah, Pritesh P.	09/23/24	0.4	Review and revise Liquidating Trust Agreement.
Steinberg, Richard J.	09/23/24	0.6	Call with American Lease, Riemer & Braunstein, and Huron regarding supplement to fleet sales agreement (0.5); follow-up call with Huron regarding same (0.1).
Resnick, Brian M.	09/24/24	1.9	Emails with Huron and Davis Polk team regarding American Lease sale issues (0.6); discuss same with R. Steinberg (0.2); calls with Cooley (0.4); call with Fisker Owners Association (0.7).
Steinberg, Richard J.	09/24/24	0.9	Call with Huron regarding fleet sale and other issues (0.8); call with J. McClammy regarding same (0.1).
Resnick, Brian M.	09/25/24	1.9	Emails and calls with Davis Polk team and Huron regarding American Lease issues (1.2); calls with G. Fisker regarding prototypes (0.5); emails with J. Dubel regarding same (0.2).
Steinberg, Richard J.	09/25/24	0.5	Emails with Huron regarding supplement to fleet sales agreement.
Resnick, Brian M.	09/26/24	1.9	Emails and calls with Huron and Davis Polk teams regarding American Lease and Fisker owner issues.
Steinberg, Richard J.	09/26/24	4.2	Meeting with W. Flolu regarding fleet sale (0.4); review and revise correspondence to interested parties regarding fleet sale (1.0); draft supplement to fleet sales agreement (2.8).
Resnick, Brian M.	09/27/24	1.3	Calls and emails with Davis Polk and Huron teams regarding American Lease and Fisker owner issues.
Steinberg, Richard J.	09/27/24	1.7	Review and revise fleet sales agreement supplement (0.9); calls with Huron regarding same (0.4); call with counsel to American Lease regarding same (0.4).
Dealissia, Mikaela	09/28/24	0.2	Correspondence regarding intellectual property diligence questions.
Resnick, Brian M.	09/28/24	0.5	Emails with Huron and Davis Polk team regarding American Lease issues (0.3); calls with R. Steinberg regarding same (0.2).
Steinberg, Richard J.	09/28/24	0.8	Call and emails with B. Resnick regarding fleet sales agreement supplement (0.4); emails with Huron regarding same (0.3); emails with Morris Nichols regarding same (0.1).
Dealissia, Mikaela	09/29/24	0.1	Correspondence with Fisker regarding IP diligence questions.

Time Detail By Project			
Name	Date	Hours	Narrative
Resnick, Brian M.	09/29/24	0.2	Emails with Huron and Davis Polk team regarding various issues.
Steinberg, Richard J.	09/29/24	0.4	Email with U.S. Trustee regarding fleet sales agreement supplement.
Dealissia, Mikaela	09/30/24	0.1	Correspondence with Fisker regarding IP diligence questions.
<b>Total BC02 Asset Dispositions</b>		<b>49.5</b>	
<b>BC03 Business Operations</b>			
Bae, Eric	09/03/24	2.4	Draft comfort motion requesting order on D&O insurance (1.8); emails and calls with Davis Polk team regarding same (0.6).
Leary, Amber	09/07/24	1.0	Attend call with Huron team regarding budget.
Steinberg, Richard J.	09/19/24	1.1	Emails and calls with counsel to Microsoft (0.6); calls with B. Resnick and Huron regarding Auto Kabel claim (0.5).
Steinberg, Richard J.	09/19/24	0.2	Emails with Huron regarding services provide abroad.
Steinberg, Richard J.	09/23/24	0.4	Emails regarding D&O insurance motion (0.2); emails regarding La Palma (0.2).
Steinberg, Richard J.	09/24/24	1.8	Call with Cooley regarding Fisker Owners Association (0.4); call with Fisker Owners Association, Cooley and Huron (1.1); call with Huron regarding recalls (0.3).
Steinberg, Richard J.	09/25/24	0.2	Emails with Cooley regarding IP deck.
Steinberg, Richard J.	09/26/24	0.5	Call with Fisker and Huron regarding SAP.
Steinberg, Richard J.	09/30/24	1.2	Call with Hogan Lovells, Huron, and Fisker regarding AutoKabel (0.3); emails regarding Hogan Lovells retention (0.2); call with C. MacGillivray regarding same and other issues (0.2); emails with B. Resnick regarding same (0.2); call with JPMorgan Chase Bank regarding restricted accounts (0.3).
<b>Total BC03 Business Operations</b>		<b>8.8</b>	
<b>BC04 Claims; Creditor Outreach</b>			
Steinberg, Richard J.	09/03/24	1.5	Negotiations with various counterparties regarding administrative claims.
Steinberg, Richard J.	09/04/24	0.3	Respond to inbound emails from various creditors.
Steinberg, Richard J.	09/05/24	0.2	Emails with Huron regarding negotiations with creditor counterparties.
Steinberg, Richard J.	09/06/24	0.8	Review and revise agreement with SAP.
Winiarski, Kevin L.	09/06/24	1.4	Draft and revise settlement agreement with SAP (1.0); emails with R. Steinberg regarding same (0.3); emails with Cozen O'Connor regarding same (0.1).
Winiarski, Kevin L.	09/07/24	0.2	Review and revise draft SAP settlement agreement.
Steinberg, Richard J.	09/10/24	2.0	Emails with Idaho tax commission (0.2); emails and call with counsel to SAP (0.4); review and revise SAP agreement (0.3); respond to inbounds from various claimants (0.8); emails with Huron regarding Adesa (0.3).
Steinberg, Richard J.	09/11/24	0.5	Attend claims workstreams call with Huron, Verita, and Morris Nichols.
Steinberg, Richard J.	09/12/24	1.2	Call with Fisker regarding amendment to Chase bank agreements (0.5); review and revise same (0.5); emails with Blank Rome regarding same (0.2).
Bae, Eric	09/13/24	1.6	Review and circulate summary of JPMorgan proof of claim (1.2); emails regarding same (0.3).
Steinberg, Richard J.	09/16/24	0.5	Emails with counsel to Salesforce regarding administrative claim agreement (0.3); respond to creditor inbounds (0.2).

<b>Time Detail By Project</b>			
<b>Name</b>	<b>Date</b>	<b>Hours</b>	<b>Narrative</b>
Winiarski, Kevin L.	09/16/24	1.9	Attend weekly call with Fisker Owners Association, Cooley, and Huron teams (1.0); review draft Plan in connection with creditor inquiries (0.4); draft email summary to R. Steinberg regarding treatment of administrative expense claims (0.5).
Resnick, Brian M.	09/17/24	0.5	Call with M. Dundon regarding Foxconn claim (0.2); call with D. Mannal regarding same (0.2); email to R. Steinberg regarding same (0.1).
Steinberg, Richard J.	09/17/24	0.4	Claims reconciliation call with Huron and Fisker (0.4); emails and calls regarding Foxconn claims (0.3).
Steinberg, Richard J.	09/18/24	1.3	Email to counsel to Microsoft (0.1); calls with Huron regarding same (0.5); emails with counsel to Salesforce regarding claims settlement (0.3); review Foxconn claims (0.4).
Yerdon, Kayleigh	09/18/24	3.5	Attention to workstreams emails (0.3); various team calls and correspondence regarding workstreams (2.2); draft settlement agreement for SAP (1.0).
Steinberg, Richard J.	09/19/24	0.8	Email to Morrison & Foerster regarding claims reconciliation (0.8); review and revise Salesforce agreement (1.7).
Resnick, Brian M.	09/21/24	0.4	Call with G. Fisker regarding Auto Kabel claim and related issues.
Resnick, Brian M.	09/23/24	0.2	Emails regarding Foxconn and other claims.
Resnick, Brian M.	09/24/24	0.3	Emails with Huron and Davis Polk teams regarding Foxconn and other claims.
Steinberg, Richard J.	09/24/24	0.7	Emails and calls with Morrison & Foerster regarding claims.
Resnick, Brian M.	09/25/24	0.1	Various emails regarding the bankruptcy claims.
Steinberg, Richard J.	09/25/24	0.7	Calls with Morrison & Foerster, Graf Isola, and Fisker regarding claims (0.5); emails with Morrison & Foerster regarding same (0.2).
McClammy, James I.	09/27/24	0.6	Calls with Bul Auto to repay amounts owed to Debtors and follow up regarding same.
Resnick, Brian M.	09/30/24	0.9	Calls and emails with Fisker and Huron teams regarding AutoKabel settlement.
Winiarski, Kevin L.	09/30/24	0.6	Attend to various creditor and claimant emails (0.4); emails with R. Steinberg regarding same (0.2).
<b>Total BC04 Claims; Creditor Outreach</b>		<b>23.1</b>	
<b>BC05 Contracts/Leases</b>			
Leary, Amber	09/04/24	1.0	Attend call with Huron team regarding recall issues.
Leary, Amber	09/06/24	0.5	Attend meeting with Davis Polk team regarding ordinary course professional payments.
Leary, Amber	09/10/24	1.0	Attention to issues relating to release of cash collateral backing surety bonds.
Steinberg, Richard J.	09/23/24	0.5	Call with Fisker and Huron regarding American Express and JPMorgan.
Leary, Amber	09/24/24	1.6	Attention to the bond release issue.
Leary, Amber	09/26/24	0.8	Prepare for and attend call regarding bond release.
<b>Total BC05 Contracts/Leases</b>		<b>5.4</b>	
<b>BC06 Corporate Governance; Board Matters; Communications</b>			
Resnick, Brian M.	09/16/24	0.2	Call with J. Dubel regarding case status.
Resnick, Brian M.	09/18/24	0.2	Call with J. Dubel regarding case status.
Resnick, Brian M.	09/20/24	0.1	Emails with J. Dubel regarding various board matters.
Resnick, Brian M.	09/23/24	1.6	Participate in September 23rd Board meeting.



Time Detail By Project				
Name	Date	Hours	Narrative	
Steinberg, Richard J.	09/23/24	1.5	Prepare for and attend Board call.	
Resnick, Brian M.	09/27/24	0.5	Calls with G. Fisker (0.3); call with J. Dubel (0.2).	
<b>Total BC06 Corporate Governance; Board Matters; Communications</b>		<b>4.1</b>		
<b>BC07 Cross-Border Issues</b>				
Resnick, Brian M.	09/01/24	0.2	Emails regarding U.S. Trustee questions in connection with 9019 settlement.	
Resnick, Brian M.	09/02/24	0.9	Emails with Austrian counsel regarding U.S. Trustee questions regarding 9019 settlement.	
Leary, Amber	09/03/24	1.3	Prepare for and attend calls regarding Fisker Canada.	
Leary, Amber	09/03/24	0.7	Attention to queries regarding 9019 motion.	
Resnick, Brian M.	09/03/24	1.8	Emails with White & Case, Graf Isola, Weil Gotshal and Fisker regarding Magna settlement issues.	
Steinberg, Richard J.	09/03/24	0.5	Call with Huron and Morris Nichols regarding Canada.	
Leary, Amber	09/04/24	1.0	Attend call with Huron and Morris Nichols regarding Fisker Canada.	
Resnick, Brian M.	09/04/24	1.2	Emails regarding Austrian deal (0.8); call with M. Simsa regarding same (0.4).	
Resnick, Brian M.	09/05/24	1.8	Call with Austrian counsel regarding 9019, Austrian term sheet and addendum (0.5); emails with Austrian counsel regarding same and related issues (0.4); negotiate same with U.S. counsel (0.9).	
Steinberg, Richard J.	09/05/24	1.0	Calls with White & Case and respective Austrian counsel regarding Austria proceedings.	
Resnick, Brian M.	09/06/24	2.5	Negotiate 9019 order and Austrian term sheet and addendum with various parties.	
Resnick, Brian M.	09/07/24	1.4	Call with White & Case regarding 9019 and related issues (0.4); emails with Austrian counsel and Davis Polk team regarding same (1.0).	
Resnick, Brian M.	09/08/24	1.8	Emails with Austrian counsel regarding Austrian settlement (0.4); calls with G. Fail regarding same (0.4); calls with White & Case regarding same (0.5); review and revise 9019 order (0.5).	
Resnick, Brian M.	09/09/24	4.5	Negotiate 9019 order and Austrian settlement with various parties thereto.	
Resnick, Brian M.	09/10/24	0.2	Review revisions to Austrian settlement and 9019-related documents.	
Leary, Amber	09/11/24	1.6	Attend internal update call (0.5); attention to matters regarding Austrian Settlement (1.1).	
Resnick, Brian M.	09/11/24	0.3	Emails with Austrian counsel and Fisker regarding closing of Austrian term sheet transaction.	
Steinberg, Richard J.	09/11/24	0.4	Emails regarding Austrian CRO and engagement letter.	
Leary, Amber	09/12/24	0.5	Attention to matters regarding Austrian Settlement (0.5).	
Resnick, Brian M.	09/12/24	0.7	Emails with Austrian counsel, Huron, H. Fisker, and G. Gupta-Fisker regarding finalization of Austrian transaction (0.5); call with C. MacGillivray regarding same (0.2).	
Steinberg, Richard J.	09/12/24	0.4	Call with Graf Isola regarding Austrian proceeding.	
Resnick, Brian M.	09/13/24	0.7	Call with Norwegian counsel (0.3); emails regarding finalization of Austrian deal (0.4).	

Time Detail By Project				
Name	Date	Hours	Narrative	
Steinberg, Richard J.	09/13/24	0.6	Call with counsel to Fisker Denmark regarding claims issues.	
Resnick, Brian M.	09/18/24	0.3	Emails with foreign counsel and Huron regarding 9019 settlement.	
Steinberg, Richard J.	09/18/24	0.1	Emails with Huron regarding cross-border insolvency proceedings.	
Steinberg, Richard J.	09/23/24	0.5	Emails with White & Case and Huron regarding foreign insolvency proceedings.	
Steinberg, Richard J.	09/24/24	0.2	Emails with Davis Polk team regarding Fisker Shanghai.	
Resnick, Brian M.	09/27/24	0.5	Emails and calls with Davis Polk team, Huron and White & Case regarding foreign jurisdiction issues.	
Steinberg, Richard J.	09/27/24	2.0	Prepare for and attend call regarding Fisker update call U.S. and European Jurisdictions (1.4); follow-up call with C. MacGilvray regarding same (0.1); emails with Huron regarding intercompany claims (0.5).	
Resnick, Brian M.	09/29/24	0.9	Call with Fisker and Huron regarding China claims issues.	
Steinberg, Richard J.	09/29/24	0.8	Call with Fisker, Huron, and Fisker Shanghai regarding foreign claims issues.	
Steinberg, Richard J.	09/30/24	1.6	Call with White & Case regarding foreign insolvency proceedings (0.3); emails with Fisker team regarding same (0.1); emails with Fisker Denmark (0.6); call with Huron team regarding intercompany claims (0.2); call with Verita team regarding same (0.2); call with Morris Nichols regarding same (0.2).	
<b>Total BC07 Cross-Border Issues</b>		<b>32.9</b>		
<b>BC08 Employee &amp; Labor</b>				
Resnick, Brian M.	09/20/24	0.3	Call and emails with C. MacGillivray regarding employee release and severance issues.	
Resnick, Brian M.	09/22/24	0.2	Call with C. MacGillivray regarding employee severance waiver.	
<b>Total BC08 Employee &amp; Labor</b>		<b>0.5</b>		
<b>BC10 General Case Administration</b>				
Leary, Amber	09/03/24	1.0	Prepare for and attend internal workstreams meeting.	
Resnick, Brian M.	09/03/24	0.5	Attend Davis Polk team workstreams meeting.	
Steinberg, Richard J.	09/03/24	1.4	Analyze weekly fee accruals in connection with cash collateral budget (0.5); emails and calls with Davis Polk team regarding recall-related order (0.9).	
Winiarski, Kevin L.	09/03/24	1.0	Attend workstreams meeting with B. Resnick, R. Steinberg, and A. Leary (0.6); emails with R. Steinberg regarding workstreams and planning (0.4).	
Leary, Amber	09/04/24	0.5	Attend workstreams meeting with Huron team.	
Richmond, Marjorie	09/04/24	0.3	Retrieve hearing transcripts in various bankruptcy proceedings for T. Sun.	
Steinberg, Richard J.	09/04/24	0.7	Call with Fisker and Huron regarding Dealer and Recall Issues.	
Leary, Amber	09/05/24	5.5	Attend call with Huron team regarding budget (1.5); attend calls regarding Fisker Austria (0.8); attend Huron workstreams call (1.0); attend internal workstreams call (0.5); attend call with Huron (1.0); attention to various other matters (0.7).	

Time Detail By Project			
Name	Date	Hours	Narrative
Steinberg, Richard J.	09/05/24	2.3	Attend Huron workstreams calls (1.0); attend Davis Polk workstreams meeting (0.3); review interim compensation procedures (0.5); review and revise monthly operating report (0.3); emails with Huron and Morris Nichols regarding same (0.2).
Winiarski, Kevin L.	09/05/24	1.0	Attend workstreams call with R. Steinberg and A. Leary.
Bae, Eric	09/06/24	0.9	Review and circulate court filings to Davis Polk team (0.2); attend strategy meeting with Davis Polk team (0.7).
Giddens, Magali	09/06/24	0.9	Review recent court filings on bankruptcy docket.
Steinberg, Richard J.	09/06/24	0.8	Attend standing call with Fisker Owners Association (0.6); follow-up call with Huron regarding same (0.2).
Steinberg, Richard J.	09/10/24	2.4	Attend workstream calls with Huron team.
Bae, Eric	09/11/24	0.7	Coordinate translation services for engagement letter (0.4); review and calendar Toccata motion (0.3).
Giddens, Magali	09/11/24	0.9	Review Combined Plan and Disclosure Statement.
Steinberg, Richard J.	09/11/24	2.5	Attend Huron workstream calls (1.5); call with A. Leary regarding workstreams (0.5); review and revise correspondence to U.S. Trustee regarding budgets (0.5).
Graves, Will	09/12/24	0.2	Sent Docusign request to J. DiDonato for A. Leary (0.2); Sent Docusign to J. Zhao per A. Leary (0.2).
Graves, Will	09/12/24	0.2	Sent Docusign to J. Zhao per A. Leary.
Steinberg, Richard J.	09/12/24	0.6	Attend workstream calls with Huron team.
Steinberg, Richard J.	09/13/24	1.0	Attend call with J. DiDonato and internal Fisker counsel.
Steinberg, Richard J.	09/13/24	0.4	Attend workstreams call with Huron team.
Giddens, Magali	09/16/24	0.5	Review recent team correspondence and case documents.
Steinberg, Richard J.	09/16/24	1.4	Review motion to extend time for removal (0.3); emails with Huron regarding surety bonds (0.3); attend Huron workstreams call (0.5); review and revise asset sale update report (0.3).
Steinberg, Richard J.	09/17/24	0.4	Call with Huron and D. Swan regarding cloud transition (0.4); calls with J. Palacios regarding various workstreams (0.4); call and emails with Fisker and Huron regarding NHTSA issues (1.3); emails with Huron regarding securing recall parts (0.4); emails regarding D&O insurance motion (0.3).
Steinberg, Richard J.	09/18/24	3.3	Calls with Dykema Gossett and Fisker regarding NHTSA issues (0.5); otherwise attend to recall-related issues (2.0); call with B. Resnick regarding same (0.3); emails with B. Resnick and A. Leary regarding restricted cash (0.3); emails with surety regarding same (0.2).
Giddens, Magali	09/19/24	0.5	Review recent team correspondence and court filings regarding case status.
Winiarski, Kevin L.	09/19/24	1.0	Attend call with B. Resnick, R. Steinberg, and NHTSA regarding Plan (0.6); attend follow-up workstreams meeting with B. Resnick and R. Steinberg (0.4).
Yerdon, Kayleigh	09/19/24	1.5	Draft and revise settlement agreement and order.
Leary, Amber	09/23/24	1.2	Attention to various emails (0.3); internal meeting with Davis Polk team (0.9).
Steinberg, Richard J.	09/23/24	2.3	Attend Huron workstreams calls (1.4); attend Davis Polk team workstreams call (0.9).
Yerdon, Kayleigh	09/23/24	0.3	Correspondence with team regarding workstreams coverage.
Steinberg, Richard J.	09/24/24	2.2	Attend Huron workstreams calls (1.2); calls with B. Resnick regarding various workstreams (0.5); emails and call with Reorg Research (0.5).
Giddens, Magali	09/25/24	0.8	Review recent court filings in connection with case status.

Time Detail By Project				
Name	Date	Hours	Narrative	
Leary, Amber	09/25/24	1.0	Discussions and deliberation regarding release of customs bond.	
Steinberg, Richard J.	09/25/24	3.0	Attend Huron workstreams calls (1.0); calls with B. Resnick regarding various workstreams (0.5); attend call with Fisker Owners Association (1.1); call with Blank Rome regarding reserve accounts (0.4).	
Steinberg, Richard J.	09/26/24	1.8	Attend Huron workstreams calls (1.2); calls with B. Resnick and A. Leary regarding various workstreams (0.6).	
Giddens, Magali	09/27/24	0.6	Correspondence with J. Candelario and Davis Polk team regarding notice parties hotline (0.2); review correspondence related documents and court documents (0.4).	
Leary, Amber	09/27/24	1.2	Attend call with Davis Polk team (0.3); attention to various matters regarding bond release (1.0).	
Steinberg, Richard J.	09/27/24	1.6	Attend call with Fisker Owners Association (1.1); attend pre-call regarding same with Huron (0.2); attend Huron workstreams calls (0.8); attend Davis Polk workstreams call (0.3).	
Stevens, Kelsey D.	09/27/24	0.5	Coordinate signature page distribution via DocuSign to J. DiDonato.	
Leary, Amber	09/30/24	3.2	Attend workstream meeting with Davis Polk team (1.2); workstream regarding Plan confirmation and emergence (2.0).	
Steinberg, Richard J.	09/30/24	2.2	Attend Huron workstreams meeting (0.6); emails and calls with Huron regarding same (1.1); draft response emails to inbounds from creditors and equityholders (0.3); emails with A. Leary regarding bond release (0.2).	
Winiarski, Kevin L.	09/30/24	1.9	Attend workstreams meeting with Davis Polk team (1.2); update workstreams chart (0.7).	
<b>Total BC10 General Case Administration</b>		<b>58.1</b>		
<b>BC11 Hearing Preparation/Attendance</b>				
Mills, Michael G.	09/04/24	0.2	Email N. D'Angelo and T. Sun regarding hearing preparation materials.	
Leary, Amber	09/06/24	0.7	Attend call regarding disclosure statement hearing preparation.	
Leary, Amber	09/07/24	3.7	Attend various calls in anticipation of disclosure statement hearing (1.3); review Plan comments and communications regarding same (2.4).	
Resnick, Brian M.	09/07/24	0.6	Prepare for disclosure statement hearing and attention to related items.	
Winiarski, Kevin L.	09/07/24	0.5	Call with R. Steinberg, A. Leary, and N. D'Angelo regarding disclosure statement hearing preparation.	
Leary, Amber	09/08/24	5.3	Prepare for disclosure statement hearing and attention to related items.	
McClammy, James I.	09/08/24	7.4	Prepare regarding disclosure statement hearing and attention to related items.	
Resnick, Brian M.	09/08/24	0.6	Prepare for disclosure statement hearing and attention to related items.	
Winiarski, Kevin L.	09/08/24	4.0	Review and revise talking points for disclosure statement hearing (1.5); meet with Davis Polk team regarding hearing preparation (0.8); meet with Morris Nichols team regarding same (1.1); follow-up emails and meeting with Davis Polk and Morris Nichols teams regarding same (0.6).	
Bae, Eric	09/09/24	1.5	Attend disclosure statement hearing (1.3); set up listen-only line for hearing (0.2).	

<b>Time Detail By Project</b>				
<b>Name</b>	<b>Date</b>	<b>Hours</b>	<b>Narrative</b>	
D'Angelo, Nicholas	09/09/24	7.5	Attend disclosure statement hearing (1.5); prepare materials for same (6.0).	
Leary, Amber	09/09/24	10.0	Prepare for and attend disclosure statement hearing.	
McClammy, James I.	09/09/24	8.5	Prepare for and present at disclosure statement hearing.	
Resnick, Brian M.	09/09/24	2.0	Prepare for disclosure statement hearing (0.5); participate in hearing (1.5).	
Steinberg, Richard J.	09/09/24	9.8	Prepare for and attend disclosure statement hearing.	
Winiarski, Kevin L.	09/09/24	5.7	Prepare and revise talking points for disclosure statement hearing (2.8); attend meetings with Davis Polk and Morris Nichols teams regarding same (1.8); attend hearing (1.1).	
Resnick, Brian M.	09/15/24	0.2	Emails with R. Steinberg and K. Winiarski regarding hearing.	
D'Angelo, Nicholas	09/16/24	5.0	Prepare materials and conduct research for status conference regarding Toccata.	
McClammy, James I.	09/16/24	1.5	Prepare for and present regarding stay violation motion to shorten time.	
Resnick, Brian M.	09/16/24	0.5	Participate in court hearing regarding the Toccata litigation.	
Winiarski, Kevin L.	09/16/24	0.6	Prepare for status conference regarding Toccata motions (0.3); attend same (0.3).	
D'Angelo, Nicholas	09/18/24	1.0	Coordinate and review materials for Toccata hearing on automatic stay.	
McClammy, James I.	09/19/24	1.8	Prepare for and present at stay violation hearing.	
Resnick, Brian M.	09/19/24	0.5	Attend hearing regarding the Toccata litigation.	
Sun, Tony	09/19/24	0.1	Prepare for automatic stay hearing with J. McClammy.	
Winiarski, Kevin L.	09/19/24	0.5	Attend hearing regarding motion to enforce automatic stay regarding Toccata.	
<b>Total BC11 Hearing Preparation/Attendance</b>		<b>79.7</b>		
<b>BC12 Litigation</b>				
D'Angelo, Nicholas	09/02/24	1.5	Conference with Davis Polk team regarding disclosure statement hearing (0.5) and White & Case regarding sealing motion (0.5); review materials related to same (0.5).	
Resnick, Brian M.	09/02/24	1.6	Emails with various parties, Davis Polk and Morris Nichols teams regarding motion to unseal and response thereto (0.8); call with White & Case regarding same (0.5); review pleadings regarding same (0.3).	
Steinberg, Richard J.	09/02/24	0.5	Call with White & Case regarding unsealing of Creditors Committee conversion objection.	
D'Angelo, Nicholas	09/03/24	4.2	Review and revise objection to motion to unseal and coordinate with team on same (2.2); review objections to motion (1.6); conference with J. McClammy regarding preparing for disclosure statement hearing (0.4).	
Resnick, Brian M.	09/03/24	0.5	Review objection to unsealing motion (0.2); emails regarding same (0.2); review other parties' objections (0.1).	
Steinberg, Richard J.	09/03/24	1.4	Calls with N. D'Angelo regarding motion to unseal reply brief and hearing preparation (0.4); calls and negotiations with TomTom counsel and Fisker Owners Association (1.0).	
D'Angelo, Nicholas	09/04/24	3.0	Draft unsealing motion reply brief (1.7); coordinate with team regarding hearing preparation (0.3); prepare materials for same (1.0).	
McClammy, James I.	09/04/24	2.9	Review materials regarding consensual third-party releases (2.5); emails regarding Plan issues (0.4).	
Resnick, Brian M.	09/04/24	0.4	Emails with Davis Polk team regarding opt-out release issues.	

Time Detail By Project			
Name	Date	Hours	Narrative
Steinberg, Richard J.	09/04/24	1.8	Emails with TomTom counsel and Fisker Owners Association (0.4); emails with parties regarding 9019 motion (0.3); review and analysis regarding third-party releases (1.0).
Sun, Tony	09/04/24	2.1	Analyze motion for interim approval of disclosure statement in preparation for hearing per N. D'Angelo.
D'Angelo, Nicholas	09/05/24	1.0	Review materials regarding opt-out releases (0.5); prepare hearing materials (0.5).
Mills, Michael G.	09/05/24	0.1	Email with N. D'Angelo and T. Sun regarding hearing preparation.
Steinberg, Richard J.	09/05/24	0.9	Call with TomTom counsel and Fisker Owners Association counsel (0.4); emails and call with Morris Nichols regarding insurance defense costs motion (0.5).
Sun, Tony	09/05/24	0.3	Review third-party release cases in preparation for disclosure statement hearing.
D'Angelo, Nicholas	09/06/24	3.0	Review U.S. Trustee objection to Plan (0.7); revise reply regarding same (1.5); conference with team regarding same (0.3) prepare for hearing (0.5).
Resnick, Brian M.	09/06/24	1.0	Emails and calls with Davis Polk team regarding reply to U.S. Trustee objection (0.8); review same (0.2).
Steinberg, Richard J.	09/06/24	1.0	Review and revise stipulated order with TomTom (0.5); calls with counsel regarding same (0.5).
D'Angelo, Nicholas	09/07/24	3.3	Conference with R. Steinberg and team regarding hearing preparation and reply to U.S. Trustee objection to Plan (0.6); prepare materials related to same (2.7).
Resnick, Brian M.	09/07/24	1.5	Emails and calls with Davis Polk and Morris Nichols teams regarding response to U.S. Trustee objection (1.2); review draft response (0.3).
D'Angelo, Nicholas	09/08/24	5.2	Revise reply to U.S. trustee Plan objection (2.5); prepare same for filing (0.2); attend hearing preparation sessions (1.5); review materials related to same (0.5); coordinate with team regarding same (0.5).
Goodman, Corey M.	09/08/24	0.4	Attend conference call with White & Case regarding liquidating trust analysis in Combined Plan and Disclosure Statement.
Resnick, Brian M.	09/08/24	1.8	Call with M. Bates regarding Plan litigation (0.4); calls with Davis Polk and Morris Nichols teams regarding same (1.2); review reply brief (0.2).
Steinberg, Richard J.	09/09/24	0.6	Review and revise unsealing order and certification of counsel in connection with same.
D'Angelo, Nicholas	09/10/24	1.0	Coordinate with Huron team and Fisker regarding dealer issues.
D'Angelo, Nicholas	09/11/24	4.6	Draft motion to enforce automatic stay (2.8); emails with J. McClammy and Toccata's counsel regarding stipulation and violations (1.0); review Toccata's motion for payment and exhibits to same (0.6).
McClammy, James I.	09/11/24	1.2	Follow up regarding Toccata issues for return of vehicles, claim challenge
Mills, Michael G.	09/11/24	0.4	Email with N. D'Angelo and T. Sun regarding lien research (0.2); analyze research question regarding liens (0.2).
Sun, Tony	09/11/24	0.7	Conduct legal research regarding dealer disputes.
D'Angelo, Nicholas	09/12/24	5.6	Draft and revise emergency motion to enforce automatic stay (4.1); coordinate with team and Fisker regarding filing of motion (0.5); coordinate with opposing counsel regarding emergency motion and shortened notice (1.0).

Time Detail By Project				
Name	Date	Hours	Narrative	
McClammy, James I.	09/12/24	2.1	Review and revise automatic stay motion papers (1.3); emails regarding automatic stay violation and motion (0.8).	
Mills, Michael G.	09/12/24	3.0	Email with N. D'Angelo and T. Sun regarding lien research (0.2); analyze lien research question (0.2); research regarding liens (2.6).	
Sun, Tony	09/12/24	1.7	Conduct legal research regarding dealer disputes.	
D'Angelo, Nicholas	09/13/24	2.0	Conference with J. McClammy regarding Toccata opposition (0.5), review same (0.5), draft reply regarding same (1.0).	
McClammy, James I.	09/13/24	0.7	Review opposition to motion to shorten time (0.2); emails regarding response (0.4).	
Mills, Michael G.	09/13/24	0.1	Email with N. D'Angelo regarding lien research.	
D'Angelo, Nicholas	09/14/24	2.7	Draft reply to Toccata's opposition to motion to shorten.	
D'Angelo, Nicholas	09/15/24	2.0	Revise draft reply to Toccata's opposition to motion to shorten.	
McClammy, James I.	09/15/24	0.8	Review and revise reply in support of motion to shorten time.	
Steinberg, Richard J.	09/15/24	1.8	Call with N. D'Angelo regarding Toccata opposition to motion to shorten (0.5); review pleadings regarding same (0.8); email to Fisker regarding same (0.5).	
McClammy, James I.	09/16/24	0.7	Call with C. Simon regarding vehicle return issues (0.4); call with J. Mueller regarding Toccata vehicles (0.3).	
Mills, Michael G.	09/16/24	0.1	Email N. D'Angelo regarding lien research.	
Resnick, Brian M.	09/16/24	0.5	Call with C. MacGillivray regarding securities litigation (0.2); call with Orrick Herrington regarding same (0.3).	
Steinberg, Richard J.	09/16/24	0.4	Correspondence to the board and management regarding Toccata.	
Cohen, Robert A.	09/17/24	0.5	Call with O'Melveny & Myers and Fisker regarding transition of counsel and status of matter.	
D'Angelo, Nicholas	09/17/24	3.5	Draft and conduct research for objection to Toccata claims motion.	
McClammy, James I.	09/17/24	1.9	Call with Davis Polk and Huron regarding Toccata next steps (0.5); consideration of possible resolution points with Toccata (0.6); review SEC subpoena and call regarding same (0.8).	
Resnick, Brian M.	09/17/24	1.0	Calls with Davis Polk, Fisker and Orrick Herrington regarding securities litigation (0.9); emails regarding Toccata litigation (0.1).	
Chen, Chen	09/18/24	0.7	Review background regarding SEC investigation (0.3); confer with Orrick Herrington regarding same (0.4).	
Cohen, Robert A.	09/18/24	0.2	Emails with KLDDiscovery regarding assuming representation for matter (0.1); emails with Fisker and Orrick Herrington regarding laptop preservation (0.1).	
McClammy, James I.	09/18/24	1.2	Follow up regarding Toccata stay violations and prepare for same hearing.	
Paydar, Samira	09/18/24	0.7	Correspondence with R. Cohen and C. Chen regarding matter background.	
Resnick, Brian M.	09/18/24	0.1	Call with C. MacGillivray regarding Toccata litigation.	
Steinberg, Richard J.	09/18/24	0.2	Emails with team regarding Toccata dispute.	
Chen, Chen	09/19/24	1.1	Review onboarding documents relating to SEC investigation (0.7); attend calls with R. Cohen and S. Paydar regarding onboarding (0.4).	
Cohen, Robert A.	09/19/24	0.3	Emails with K. Askew regarding communications with SEC (0.1); call with S. Paydar and C. Chen regarding assuming representation (0.2).	
McClammy, James I.	09/19/24	0.9	Call with new Toccata counsel (0.6); follow up regarding potential resolution (0.3).	

Time Detail By Project				
Name	Date	Hours	Narrative	
Paydar, Samira	09/19/24	5.1	Review investigation background materials (4.1); prepare for meeting with R. Cohen and C. Chen (0.6); meeting with R. Cohen and C. Chen regarding matter background and next steps (0.4).	
Resnick, Brian M.	09/19/24	1.2	Emails and calls with Davis Polk team and Fisker regarding Toccata litigation (1.0); emails with R. Cohen and Orrick Herrington regarding SEC investigation (0.2).	
Chen, Chen	09/20/24	0.2	Attend call with A. Winawer, R. Cohen and others regarding transition of SEC investigation.	
Chen, Chen	09/20/24	0.4	Attend call with e-discovery management team regarding engagement with KLDiscovery.	
Chen, Chen	09/20/24	1.4	Review SEC subpoenas and previous productions (1.4); Confer with e-discovery management team and others regarding engagement with KLDiscovery counsel transition (2.1); Attend call with A. Winawer, R. Cohen and others regarding transition of SEC investigation (0.2); Attend call with e-discovery management team regarding engagement with KLDiscovery (0.4).	
Chen, Chen	09/20/24	2.1	Confer with e-discovery management team and others regarding engagement with KLDiscovery counsel transition.	
Cohen, Robert A.	09/20/24	0.2	Emails with C. Chen and S. Paydar regarding document collection, review, and vendor agreement.	
Lewis, Jonathan H.	09/20/24	1.3	Correspondence and calls with Davis Polk case team, A. Pravda, and Consilio regarding e-discovery vendor contracting and document review project management issues.	
McClammy, James I.	09/20/24	1.3	Calls and emails regarding potential Toccata resolution.	
Nestor, David	09/20/24	0.4	Correspond internally regarding KLDiscovery vendor engagement agreement.	
Paydar, Samira	09/20/24	3.3	Review revised KLDiscovery statement of work and related correspondence with C. Chen and KLDiscovery (0.5); set up relativity credentials and review database for production background (0.4); meeting with Orrick Herrington and C. Chen regarding matter background (0.4); communications with C. Chen regarding various workstreams (1.0); meeting with J. Lewis and C. Chen regarding document review vendor (0.5); communications with KLDiscovery regarding relativity access and related workstreams (0.5).	
Pravda, Adam	09/20/24	0.4	Call with C. Chen, S. Paydar, and J. Lewis regarding KLDiscovery engagement (0.4); Emails with J. Lewis and D. Nestor regarding vendor engagement (0.2); Emails with case team regarding vendor engagement (0.1).	
Pravda, Adam	09/20/24	0.2	Emails with J. Lewis and D. Nestor regarding vendor engagement.	
Pravda, Adam	09/20/24	0.1	Emails with case team regarding vendor engagement.	
Wagner, Eric N.	09/20/24	3.6	Create portfolio of materials sent from Orrick Herrington per C. Chen.	
McClammy, James I.	09/21/24	1.7	Coordinate with various case parties regarding finalizing Toccata settlement.	
Butler, James C.	09/23/24	3.6	Draft stipulation of settlement with Toccata.	
Chen, Chen	09/23/24	1.9	Confer with S. Paydar and others regarding SEC investigation (1.1); attend call with KLDiscovery regarding engagement (0.3); call with S. Paydar and e-discovery management team regarding KLDiscovery engagement (0.3); call with S. Paydar regarding document review protocol (0.2).	



Time Detail By Project			
Name	Date	Hours	Narrative
Cohen, Robert A.	09/23/24	0.2	Correspondence with S. Paydar and C. Chen regarding next steps in connection with document vendor (0.1); emails with SEC regarding taking over matter (0.1).
Lewis, Jonathan H.	09/23/24	1.0	Correspondence and calls with Davis Polk case team, A. Pravda, and Consilio regarding e-discovery vendor contracting and document review project management issues.
Paydar, Samira	09/23/24	3.3	Correspondence with C. Chen, R. Cohen, J. Lewis, A. Pravda, and KLDDiscovery and others regarding vendor engagement (0.7); meeting with C. Chen, J. Lewis, and KLDDiscovery regarding statement of work agreement (0.5); call with C. Chen regarding Statement of Work follow up (0.2); meeting with C. Chen, J. Lewis, and A. Pravda in advance of discussion with KLDDiscovery (0.3); Review portfolio of documents prepared by E. Wagner (1.0); meet with J. Lewis regarding statement of work agreement with document vendor (0.6).
Pravda, Adam	09/23/24	0.6	Call with C. Chen, S. Paydar, and J. Lewis regarding KLDDiscovery agreement (0.3); call with case team and KLDDiscovery regarding vendor engagement (0.3).
Sun, Tony	09/23/24	0.2	Correspondence with J. Butler regarding litigation workstreams.
Wagner, Eric N.	09/23/24	0.4	Coordinate printing and delivery of materials from Orrick Herrington portfolio, per C. Chen.
Butler, James C.	09/24/24	3.2	Draft and revise stipulation of settlement agreement with Toccata
Chen, Chen	09/24/24	4.1	Review prior SEC productions and correspondence with R. Cohen regarding, e-discovery team and others regarding document collection (3.5); calls with SEC regarding subpoena response (0.3); calls with S. Paydar and R. Cohen regarding SEC subpoena response (0.3).
Cohen, Robert A.	09/24/24	1.1	Review prior production status and Orrick Herrington communications with SEC (0.3); emails with S. Paydar and C. Chen regarding document review (0.2); call with SEC regarding assuming matter and document production status (0.3); call with S. Paydar and C. Chen regarding next steps following call with SEC (0.2); update email to Fisker regarding SEC call (0.1).
McClammy, James I.	09/24/24	1.4	Review and comment regarding settlement stipulation with Toccata (0.9); emails and calls regarding Toccata settlement (0.5).
Paydar, Samira	09/24/24	0.8	Correspondence with R. Cohen and C. Chen, J. Lewis and others regarding various workstreams (0.8); Review correspondences with SEC including document request tracker from Orrick Herrington (1.1); Communications with C. Chen and KLDDiscovery regarding status of document collections (0.5).
Paydar, Samira	09/24/24	1.1	Review correspondences with SEC including document request tracker from Orrick Herrington.
Paydar, Samira	09/24/24	0.5	Communications with C. Chen and KLDDiscovery regarding status of document collections.

Time Detail By Project				
Name	Date	Hours	Narrative	
Paydar, Samira	09/24/24	2.3	Analyze status of document collections from KLDISCOVERY processing reports (0.9); attend meeting with SEC, R. Cohen, and C. Chen (0.3); revise notes taken during meeting with SEC (0.6); meeting with R. Cohen and C. Chen following SEC meeting regarding document production next steps (0.3); meeting with C. Chen regarding next steps (0.2).	
Pravda, Adam	09/24/24	0.8	Emails with C. Chen regarding document metrics (0.2); analyze processing reports to provide metrics requested by C. Chen (0.2); emails with KLDISCOVERY regarding processing report metrics (0.2); staff e-discovery management team on new matter (0.2).	
Soussan, Susan	09/24/24	0.5	Attention to new case assignment per A. Pravda.	
Steinberg, Richard J.	09/24/24	2.5	Call with Huron and Fisker regarding Indy dealer (0.4); call with J. McClammy regarding same (0.1); review and revise Toccata certification of counsel, stipulation and order (2.0).	
Butler, James C.	09/25/24	1.8	Discuss case background with J. McClammy (0.5); coordinate Toccata settlement stipulation filing with Davis Polk team and interested parties (1.3).	
Chen, Chen	09/25/24	3.0	Draft SEC search terms (0.8) confer with S. Paydar and others regarding same (0.2); confer with KLDISCOVERY and others regarding prior SEC document productions (0.8); attend call with e-discovery management and S. Paydar regarding KLDISCOVERY engagement (0.4); conference with KLDISCOVERY and others regarding prior SEC document productions (0.8).	
Lewis, Jonathan H.	09/25/24	2.0	Draft and revise KLDISCOVERY statement of work for e-discovery services and managed document review (1.5); correspondence, calls with Davis Polk case team, D. Nestor, KLDISCOVERY regarding e-discovery vendor contracting issues (0.5).	
McClammy, James I.	09/25/24	0.4	Follow up regarding Toccata settlement and objection extension.	
Nestor, David	09/25/24	0.3	Call with C. Chen regarding KLDISCOVERY vendor engagement agreement.	
Paydar, Samira	09/25/24	3.7	Meeting with J. Lewis, D. Nestor, and C. Chen regarding document vendor MSA, statement of work agreements (0.5); correspondence with J. Lewis and others regarding statement of work agreement with vendor (0.5); communications with C. Chen regarding various workstreams (0.8); review correspondences with R. Cohen and others regarding bankruptcy proceedings (0.3); review motion to allow advancement per R. Cohen (0.8); prepare search terms for first-level review team and related correspondences with Davis Polk e-discovery team (0.8).	
Resnick, Brian M.	09/25/24	1.2	Calls and emails with R. Cohen, T. Polubinski, J. McClammy and C. MacGillivray regarding SEC investigation and related matters.	
Soussan, Susan	09/25/24	0.4	Attention to database search request per C. Chen.	
Steinberg, Richard J.	09/25/24	1.2	Call with R. Cohen, B. Resnick and others regarding litigation (0.6); review D&O insurance motion (0.4); emails with J. McClammy regarding same (0.2)	
Sun, Tony	09/25/24	0.1	Review payments received by Fisker from dealerships.	
Chen, Chen	09/26/24	0.2	Conference with KLDISCOVERY regarding search terms.	

Time Detail By Project			
Name	Date	Hours	Narrative
Lewis, Jonathan H.	09/26/24	1.0	Review draft KLDISCOVERY conflicts waiver form (0.2); correspondence and calls with Davis Polk case team, D. Nestor, and KLDISCOVERY regarding e-discovery vendor contracting issues (0.4).
Paydar, Samira	09/26/24	0.8	Review conflicts waiver correspondence with J Lewis and others regarding same (0.5); communications with KLDISCOVERY, C. Chen, and Davis Polk e-discovery team regarding search term hits (0.3).
Steinberg, Richard J.	09/26/24	0.5	Call with Morgan Lewis regarding lemon law claims.
Chen, Chen	09/27/24	0.4	Conference with KLDISCOVERY, S. Paydar and others regarding search terms.
Lewis, Jonathan H.	09/27/24	0.2	Correspondence and calls with Davis Polk case team, D. Nestor and KLDISCOVERY regarding e-discovery vendor contracting issues.
Paydar, Samira	09/27/24	1.7	Correspond with J. Lewis, KLDISCOVERY, and C. Chen regarding document collection workstreams (0.5); Analyze search term hits and correspondence regarding same (0.6); Review document vendor contract per J. Lewis (0.6).
Paydar, Samira	09/27/24	1.2	Analyze search term hits and correspondence regarding same (0.6); review document vendor contract per J. Lewis (0.6).
Resnick, Brian M.	09/27/24	0.3	Review new case relevant to opt-outs under plan.
Chen, Chen	09/28/24	0.2	Confer with S. Paydar regarding search terms.
Lewis, Jonathan H.	09/28/24	0.2	Correspondence, with Davis Polk case team, D. Nestor, and KLDISCOVERY regarding e-discovery vendor contracting issues.
McClammy, James I.	09/28/24	0.3	Follow up regarding Toccata non-responsiveness in connection with settlement.
Paydar, Samira	09/28/24	0.6	Correspond with C. Chen and R. Cohen regarding search term hits (0.4); correspondence with J. Lewis and C. Chen regarding vendor agreements (0.2).
Butler, James C.	09/29/24	0.3	Respond to case inquiry from J. McClammy.
McClammy, James I.	09/29/24	0.5	Emails regarding Toccata non-responsiveness to settlement and outreach.
Butler, James C.	09/30/24	0.2	Send follow-up correspondence to Toccata counsel.
Chen, Chen	09/30/24	0.4	Confer with R. Cohen and Davis Polk team regarding document review for SEC productions.
Cohen, Robert A.	09/30/24	0.1	Emails with SEC and Davis Polk team, regarding call in connection with next steps.
McClammy, James I.	09/30/24	2.8	Teleconferences, emails, and work to close on agreement with Toccata.
Paydar, Samira	09/30/24	0.3	Correspondence with R. Cohen, C. Chen, and Davis Polk team regarding various SEC investigation workstreams.
Steinberg, Richard J.	09/30/24	0.2	Emails with Morrison & Foerster, White & Case, and U.S. Trustee regarding Toccata settlement.
<b>Total BC12 Litigation</b>		<b>163.3</b>	
<b>BC13 Plan; Disclosure Statement; Confirmation</b>			
Matlock, Tracy L.	09/01/24	0.1	Email with Davis Polk team regarding Combined Plan and Disclosure Statement.
Resnick, Brian M.	09/02/24	0.1	Emails with White & Case team regarding Plan comments.
Resnick, Brian M.	09/03/24	1.0	Emails with White & Case regarding Plan (0.1); emails with Davis Polk team regarding same (0.5); discuss same with R. Steinberg (0.4).

Time Detail By Project			
Name	Date	Hours	Narrative
Steinberg, Richard J.	09/03/24	2.5	Call with Morrison & Foerster regarding Plan (0.1); attend Plan workstreams meeting with Davis Polk team (0.5); calls with B. Resnick regarding same (0.5); attend Huron workstreams calls (1.1); calls with Huron regarding Plan documents (0.3).
Resnick, Brian M.	09/04/24	3.1	Emails regarding comments to disclosure statement and Plan (2.5); meet with R. Steinberg regarding same and related issues (0.3); emails with litigation team regarding same (0.3).
Steinberg, Richard J.	09/04/24	1.2	Attend to comments from SEC to disclosure statement order (1.0); call with SEC regarding same (0.2).
Resnick, Brian M.	09/05/24	2.5	Emails and calls regarding Combined Plan and Disclosure Statement.
Steinberg, Richard J.	09/05/24	5.6	Review and revise Plan (0.8); emails with Davis Polk team regarding same (1.0); call with DOJ regarding same (0.3); calls with Morrison & Foerster, M3, and/or Huron regarding budget (0.8); calls with Huron regarding Plan (0.4); review and revise hearing agenda (0.2); emails with parties regarding revised disclosure statement order (0.5); prepare confirmation timeline and workstreams chart (0.9); review and revise disclosure statement order (0.5); call with Weil Gotshal (0.2).
Winiarski, Kevin L.	09/05/24	0.8	Draft and revise Combined Plan and Disclosure Statement summary (0.7); email with R. Steinberg regarding same (0.1).
McClammy, James I.	09/06/24	2.2	Review U.S. Trustee objection to disclosure statement approval (0.7); call regarding same (0.5); review cases in connection with same (1.0).
Resnick, Brian M.	09/06/24	3.3	Emails with various parties regarding Combined Plan and Disclosure Statement comments (1.5); calls with R. Steinberg and others regarding same (1.0); review comments to same (0.8).
Steinberg, Richard J.	09/06/24	8.2	Attend to disclosure statement issues, including review and revise Combined Plan and Disclosure Statement and reply to U.S. Trustee objection.
Winiarski, Kevin L.	09/06/24	1.0	Review and revise Combined Plan and Disclosure Statement (0.7); emails with R. Steinberg regarding same (0.3).
Bae, Eric	09/07/24	2.9	Review and revise Combined Plan and Disclosure Statement.
Resnick, Brian M.	09/07/24	2.2	Call with M. Bates regarding Plan (0.4); review various parties' comments to Combined Plan and Disclosure Statement and revisions to same (1.3); discuss regarding same with R. Steinberg (0.5).
Steinberg, Richard J.	09/07/24	11.3	Attend to disclosure statement issues, including review and revise Combined Plan and Disclosure Statement and reply to U.S. Trustee objection to same.
Winiarski, Kevin L.	09/07/24	2.7	Review and revise draft combined Plan and disclosure statement (1.9); emails with R. Steinberg regarding same (0.2); revise Plan to incorporate various parties' comments (0.6).
Resnick, Brian M.	09/08/24	4.8	Review revisions and comments to Plan (3.0); calls with Davis Polk team regarding same (1.0); calls with Morrison & Foerster regarding same (0.2); calls with White & Case regarding same (0.3); call with J. Dubel regarding same (0.3).
Steinberg, Richard J.	09/08/24	11.7	Attend to disclosure statement issues, including reviewing and revising Combined Plan and Disclosure Statement and reply to U.S. Trustee objection.

Time Detail By Project			
Name	Date	Hours	Narrative
Winiarski, Kevin L.	09/08/24	1.7	Review and revise draft combined Plan and disclosure statement to incorporate comments from Fisker, Heights, and Creditors Committee (1.3); emails with R. Steinberg regarding same (0.4).
Resnick, Brian M.	09/09/24	2.5	Negotiate Plan and disclosure statement with various parties.
Steinberg, Richard J.	09/09/24	4.4	Review and revise Plan (3.2); emails with parties regarding same (0.4); review and revise solicitation order (0.8).
Winiarski, Kevin L.	09/09/24	0.3	Review and revise draft Combined Plan and Disclosure Statement to incorporate Heights comments.
Resnick, Brian M.	09/10/24	0.6	Review revisions to Plan and related documents (0.2); emails with Morris Nichols and Davis Polk team regarding same (0.4).
Steinberg, Richard J.	09/10/24	3.6	Review and revise solicitation order (0.8); call with Morrison & Foerster regarding same (0.3); review and revise Plan (0.5); prepare solicitation package (0.8); emails with Morrison & Foerster regarding Creditors Committee letter (0.2); emails with White & Case and Morrison & Foerster regarding plan (0.3); review and revise responses to Uzzi & Lall's inquiries (0.7).
Resnick, Brian M.	09/11/24	0.4	Discuss Plan issues with R. Steinberg.
Steinberg, Richard J.	09/11/24	6.4	Review and revise effective date sources and uses analysis (1.1); prepare effective date cash waterfall slide (2.7); call with Huron regarding same (1.0); call with A. Leary regarding same (0.3); review and revise joint hearing notice (0.5); emails and calls with B. Resnick regarding solicitation (0.8).
Leary, Amber	09/12/24	1.6	Review Plan comments and attend calls regarding same.
Resnick, Brian M.	09/12/24	2.3	Review Creditors Committee comments to Plan and related issues list (0.5); discuss same with R. Steinberg (0.3); call with White & Case and Morrison & Foerster regarding same (0.6); emails regarding same (0.2); call with S. Greissman regarding Plan issues (0.2); call with White & Case, Uzzi & Lall and Huron regarding budget (0.5).
Steinberg, Richard J.	09/12/24	4.5	Call with White & Case regarding Plan (0.5); review markup from Morrison & Foerster regarding Plan (1.5); calls with Morrison & Foerster and White & Case regarding same (2.5).
Winiarski, Kevin L.	09/12/24	2.1	Call with Morrison & Foerster and White & Case teams regarding Plan issues (1.0); follow-up meeting with R. Steinberg and A. Leary regarding same (0.4); review emails from Davis Polk and Morris Nichols teams in connection with same (0.7).
Leary, Amber	09/13/24	1.9	Review and revise Combined Plan and Disclosure Statement.
Resnick, Brian M.	09/13/24	0.6	Call with R. Steinberg regarding Plan (0.2); call with Cooley regarding plan issues (0.4).
Steinberg, Richard J.	09/13/24	5.8	Call with Davis Polk team regarding asset transfers in Plan (0.5); call with Morrison & Foerster regarding Plan (1.0); prepare for and attend call with Cooley regarding Fisker Owners Association (0.7); follow-up call with B. Resnick regarding same (0.3); call with Blank Rome regarding Plan (0.1); call with White & Case regarding Plan (0.2); call with B. Resnick regarding Plan (0.2); review and revise plan analysis (2.2); email to Huron regarding same (0.6).
Winiarski, Kevin L.	09/13/24	0.9	Review and revise draft Combined Plan and Disclosure Statement (0.5); call with R. Steinberg and A. Leary regarding same (0.3).
Resnick, Brian M.	09/14/24	0.2	Emails with Huron and R. Steinberg regarding effective date waterfall.

Time Detail By Project			
Name	Date	Hours	Narrative
Steinberg, Richard J.	09/15/24	2.9	Review and revise Combined Plan and Disclosure Statement.
Resnick, Brian M.	09/16/24	0.9	Review revisions to Plan (0.4); review release chart and email to Fisker (0.3); discuss same with R. Steinberg (0.2).
Steinberg, Richard J.	09/16/24	5.2	Review and revise Plan (2.1); emails and calls with Davis Polk team regarding same (0.4); emails with various interested parties regarding same (0.3); emails with Huron regarding payment of professional fees (0.2); email with Huron regarding data privacy (0.2); emails regarding NHTSA (0.3); emails with Huron regarding data privacy (0.2); emails with Davis Polk intellectual property team regarding same (0.2); emails with Department of Justice regarding Plan (0.2); revise release and exculpation summary (0.9); emails with B. Resnick regarding same (0.3).
Winiarski, Kevin L.	09/16/24	3.4	Review and revise Combined Plan and Disclosure Statement to incorporate Creditors Committee and R. Steinberg comments (1.5); emails with R. Steinberg regarding same (0.2); emails with R. Steinberg and K. Yerdon regarding Plan questions from creditors (0.5); review and further revise draft Plan and disclosure statement to incorporate B. Resnick and R. Steinberg comments (1.1); email same to White & Case (0.1).
Resnick, Brian M.	09/17/24	0.9	Call with Morrison & Foerster regarding plan issues (0.5); emails regarding same (0.2); discuss same with R. Steinberg (0.2).
Steinberg, Richard J.	09/17/24	6.2	Review and revise plan (2.1); call with Morrison & Foerster to discuss plan and budget (1.3); review and revise release and exculpation summary (0.5); call with Davis Polk intellectual property team, Huron, and Fisker, including D. Swan regarding data privacy (0.5); call with Morrison Foerster regarding budget (0.6); review and revise effective date cash slide (1.1); emails with Huron regarding same (0.3); emails with Davis Polk litigation team regarding releases (0.3).
Winiarski, Kevin L.	09/17/24	1.0	Review and revise draft of Combined Plan and Disclosure Statement (0.7); emails with R. Steinberg regarding same (0.3).
Resnick, Brian M.	09/18/24	0.3	Emails regarding revisions to Plan and related issues.
Steinberg, Richard J.	09/18/24	3.2	Analysis regarding settlement budget and related claims (0.8); email to Huron regarding same (0.2); review and revise IP/Austria Trust Agreement (1.1); emails internally regarding same (0.3); review and revise combined Plan and Disclosure Statement (0.8).
Resnick, Brian M.	09/19/24	2.2	Call with NHTSA and Fisker regarding plan provisions (0.8); discuss same with R. Steinberg and K. Winiarski (0.7); call with S. Greissman regarding plan (0.2); call with R. Steinberg regarding plan and budget (0.5).
Steinberg, Richard J.	09/19/24	4.9	Review and revise plan (1.0); prepare for and attend call with NHTSA and Department of Justice (1.0); call with C. MacGilvray regarding same (0.3); emails with Fisker and Huron regarding same (0.3); call with J. Logel regarding same (0.3); follow-up emails with Fisker regarding same (0.7); scall with Huron regarding Plan supplements (1.3).
Resnick, Brian M.	09/20/24	0.4	Call with D. Shamah regarding plan (0.2); emails with R. Steinberg regarding same (0.2).

Time Detail By Project			
Name	Date	Hours	Narrative
Steinberg, Richard J.	09/20/24	2.6	Review and revise post-effective date budget (0.4); review and revise NHTSA correspondence (0.4); emails with parties regarding intellectual property asset schedule (0.2); review and revise plan (0.6); update releases and exculpation analysis (0.7); email to Board and Orrick Herrington regarding same (0.3).
Winiarski, Kevin L.	09/20/24	1.8	Review and revise draft IP/Austria Assets Trust Agreement (1.5); emails with R. Steinberg regarding same (0.3).
Resnick, Brian M.	09/21/24	3.9	Review revisions to Combined Plan and Disclosure Statement (0.5); calls with R. Steinberg regarding: same (0.6); pre-call with White & Case regarding same (0.4); call with Morrison & Foerster and White & Case regarding same (0.8); review budget (0.2); call with Huron and R. Steinberg regarding same (1.4).
Steinberg, Richard J.	09/21/24	7.3	Attend to revised Combined Plan and Disclosure Statement and Plan Supplement documents.
Winiarski, Kevin L.	09/21/24	0.7	Call with Davis Polk, White & Case, and Morrison & Foerster teams regarding open issues in Plan.
Resnick, Brian M.	09/22/24	0.8	Emails with Morrison & Foerster, White & Case and R. Steinberg regarding plan revisions (0.5); emails with Huron and R. Steinberg regarding budget (0.3).
Steinberg, Richard J.	09/22/24	2.1	Attend to revised Combined Plan and Disclosure Statement and Plan Supplement documents.
Resnick, Brian M.	09/23/24	1.8	Emails and calls regarding finalization of Combined Plan and Disclosure Statement.
Steinberg, Richard J.	09/23/24	7.2	Attend to revised Combined Plan and Disclosure Statement and Plan Supplement documents.
Winiarski, Kevin L.	09/23/24	6.1	Review and revise draft Trust Agreements (2.1); emails with R. Steinberg regarding same (0.2); emails with Davis Polk teams regarding same (0.6); call with Y. Yang regarding same (0.3); further review and revision of same (2.5); finalize same for filing along with amended Combined Plan and Disclosure Statement (0.4).
Resnick, Brian M.	09/24/24	0.2	Emails regarding certain discussed Plan issues.
Steinberg, Richard J.	09/24/24	0.6	Call with White & Case regarding confirmation order and IP Assignment Agreement (0.2); emails and calls with Morrison & Foerster regarding releases (0.4).
Steinberg, Richard J.	09/25/24	1.8	Call with Fisker and Huron regarding vehicle software updates, continued support budgets and Board catch-up (0.5); call with M3 and Morrison & Foerster regarding post-effective date budget (1.3).
Resnick, Brian M.	09/26/24	1.2	Call with S. Greissman regarding Plan issues (0.2); emails and calls with Huron and Davis Polk team regarding same (1.0).
Steinberg, Richard J.	09/26/24	3.8	Review post-effective date budget and professional fee caps (1.5); calls with Huron regarding same (0.8); emails with Weil Gotshal regarding informal Plan objection (0.6); email to Weil Gotshal regarding same (0.9).
Resnick, Brian M.	09/27/24	0.8	Calls and emails with White & Case, Davis Polk and Huron teams regarding Plan issues.

<b>Time Detail By Project</b>			
<b>Name</b>	<b>Date</b>	<b>Hours</b>	<b>Narrative</b>
Steinberg, Richard J.	09/27/24	2.2	Call with White & Case regarding NHTSA (0.4); call with Weil Gotshal regarding Plan and confirmation order (0.4); call with Morris Nichols regarding plan supplement (0.1); email to Morrison & Foerster regarding releases (0.1); attend to Plan-related issues (0.9); emails with various parties regarding comments to confirmation order (0.3).
Winiarski, Kevin L.	09/27/24	0.6	Review and comment on draft of confirmation order (0.5); email to Morrison & Foerster regarding same (0.1).
Resnick, Brian M.	09/28/24	0.3	Emails with Huron and Davis Polk team regarding post-emergence budget issues.
Steinberg, Richard J.	09/28/24	0.3	Emails with White & Case and Huron regarding IP transfer.
McClammy, James I.	09/29/24	1.8	Review recent decision and transcript regarding opt-out releases (0.5); prepare regarding confirmation issues (1.3).
Resnick, Brian M.	09/29/24	0.3	Emails regarding plan and budget issues.
Matlock, Tracy L.	09/30/24	0.6	Call with Morrison & Forester and Davis Polk team regarding trust agreement.
Steinberg, Richard J.	09/30/24	4.2	Review and revise Plan (0.2); emails with Magna regarding plan and confirmation order comments (0.5); emails with White & Case and Morrison & Foerster regarding same (0.1); confirmation workstreams meeting with Davis Polk team (1.1); call with Morrison & Foerster regarding Liquidation Trust Agreement (0.5); draft responses to questions from Creditors Committee advisors (0.5); review and revise confirmation order (2.3).
Winiarski, Kevin L.	09/30/24	1.2	Call with Morrison & Foerster and Davis Polk teams regarding Plan supplements (0.5); review Morris Nichols comments on confirmation order (0.7).
<b>Total BC13 Plan; Disclosure Statement; Confirmation</b>		<b>192.7</b>	
<b>BC14 Regulatory; Antitrust; Tax; IP</b>			
Matlock, Tracy L.	09/03/24	0.1	Discuss liquidation analysis in Combined Plan and Disclosure Statement with C. Goodman.
Matlock, Tracy L.	09/04/24	0.1	Review Combined Plan and Disclosure Statement.
Eck, Georgianna	09/05/24	4.1	Review Combined Plan and Disclosure Statement schedule for tax matters.
Matlock, Tracy L.	09/05/24	4.3	Review Combined Plan and Disclosure Statement and related analysis.
Yang, Yueyu	09/05/24	1.6	Review and revise Plan (0.9); review and confirm tax treatment of trusts under Plan (0.7).
Eck, Georgianna	09/06/24	0.2	Review Combined Plan and Disclosure Statement and liquidation analysis for tax matters.
Matlock, Tracy L.	09/06/24	0.4	Emails regarding Combined Plan and Disclosure Statement.
Matlock, Tracy L.	09/07/24	0.3	Email regarding tax treatment of trusts.
Eck, Georgianna	09/08/24	0.5	Review Combined Plan and Disclosure Statement and liquidation analysis for tax matters (0.3); confer with T. Matlock, C. Goodman, Y. Yang, and D. Dreier regarding liquidation Plan grantor trust treatment (0.2).
Matlock, Tracy L.	09/08/24	0.7	Call with D. Dreier regarding tax treatment of trusts (0.2); revise Plan regarding same (0.5).
Yang, Yueyu	09/08/24	0.4	Conference with White & Case tax team regarding Plan (0.2); review and revise same (0.2).
Matlock, Tracy L.	09/09/24	0.1	Email with Davis Polk team regarding first day motions.
Eck, Georgianna	09/16/24	0.4	Review language for treatment of allowed tax claims in Combined Plan and Disclosure Statement.



<b>Time Detail By Project</b>				
<b>Name</b>	<b>Date</b>	<b>Hours</b>	<b>Narrative</b>	
Matlock, Tracy L.	09/16/24	0.2	Review Combined Plan and Disclosure Statement regarding tax issues.	
Yang, Yueyu	09/16/24	0.3	Review question on allowed tax claims and email with G. Eck regarding same.	
Eck, Georgianna	09/18/24	2.2	Review IP/Austria Assets Trust Agreement in connection with tax consequences.	
Matlock, Tracy L.	09/18/24	0.1	Email with team regarding Liquidating Trust Agreement.	
Yang, Yueyu	09/18/24	1.5	Review and revise Liquidation Trust Agreement.	
Eck, Georgianna	09/19/24	0.5	Review Intellectual Property/Austria Assets Trust Agreement for tax consequences.	
Yang, Yueyu	09/19/24	0.6	Review and revise liquidation trust agreement.	
Eck, Georgianna	09/23/24	1.4	Revise IP/Austria assets trust agreement and Liquidating Trust Agreement.	
Matlock, Tracy L.	09/23/24	5.7	Review and discuss Trust Agreements with Davis Polk team.	
Yang, Yueyu	09/23/24	1.6	Review and revise IP/Austria Assets Trust Agreement (0.7); email and conference with T. Matlock and K. Winiarski regarding Liquidating Trust Agreement (0.5); review Liquidating Trust Agreement (0.4).	
<b>Total BC14 Regulatory; Antitrust; Tax; IP</b>		<b>27.3</b>		
<b>BC16 Retention DPW: Preparation of Fee Applications, Budgeting</b>				
Giddens, Magali	09/05/24	0.1	Call with E. Bae regarding review and revision of August billing detail.	
Giddens, Magali	09/06/24	2.9	Review and revise August billing detail and correspondence with E. Bae regarding same.	
Giddens, Magali	09/09/24	2.1	Review and revise August billing detail.	
Bae, Eric	09/10/24	2.5	Review and revise August billing detail for privileged and confidential information.	
Bae, Eric	09/11/24	1.2	Review and revise August billing detail regarding privileged and confidential information.	
Bae, Eric	09/12/24	1.8	Review and revise August billing detail for privileged and confidential information (1.7) correspondence and call with M. Giddens regarding same (0.1).	
Giddens, Magali	09/12/24	2.0	Correspondence and calls with E. Bae regarding August billing detail (0.1); review and revise same (1.8); follow-up correspondence and discussion with E. Bae regarding same (0.1).	
Bae, Eric	09/13/24	0.3	Emails with Davis Polk team regarding time entries.	
Giddens, Magali	09/17/24	1.7	Correspondence with D. Shirley regarding obtaining September billing detail (0.1); review and revise August billing detail (1.6).	
Steinberg, Richard J.	09/19/24	0.5	Review and revise August 2024 invoice.	
Winiarski, Kevin L.	09/19/24	2.5	Review and revise August invoice for privilege and confidentiality.	
Bae, Eric	09/22/24	3.8	Revise August invoice in connection with third monthly fee statement.	
Bae, Eric	09/23/24	4.2	Draft and revise August monthly fee statement.	
Bae, Eric	09/24/24	3.7	Draft and revise August monthly fee statement.	
Steinberg, Richard J.	09/24/24	3.3	Review and revise August monthly fee statement.	
Bae, Eric	09/25/24	4.2	Draft and revise August fee statement (3.5); emails regarding same (0.7).	

<b>Time Detail By Project</b>			
<b>Name</b>	<b>Date</b>	<b>Hours</b>	<b>Narrative</b>
Giddens, Magali	09/25/24	0.4	Correspondence with D. Shirley regarding queries in connection with August invoice and review same (0.1); further query regarding payments (0.1); call with E. Bae regarding same and correspondence with same regarding time spent reviewing and revising August and September billing detail in connection with calculating August time and fees (0.1); review same and provide hours regarding same (0.1).
Resnick, Brian M.	09/25/24	0.3	Review the August monthly fee statement.
Steinberg, Richard J.	09/25/24	1.0	Review and revise third monthly fee statement.
Giddens, Magali	09/26/24	0.9	Review and revise September billing detail and correspondence with K. DiMeo.
Giddens, Magali	09/27/24	1.5	Review and revise September billing detail (1.4); discussion regarding billing with E. Bae (0.1).
Giddens, Magali	09/30/24	1.7	Review and revise September billing detail for privilege and confidentiality.
<b>Total BC16 Retention DPW: Preparation of Fee Applications, Budgeting</b>		<b>42.6</b>	
<b>BC18 Travel (Non-Working)</b>			
Resnick, Brian M.	09/08/24	0.9	Travel to Delaware for disclosure statement hearing.
Winiarski, Kevin L.	09/08/24	1.0	Travel from New York to Wilmington for disclosure statement hearing.
<b>Total BC18 Travel (Non-Working)</b>		<b>1.9</b>	
<b>TOTAL</b>		<b>689.9</b>	

**EXHIBIT B****EXPENSE SUMMARY**

**FISKER INC., et al.**  
**(Case No. 24-11390 (TMH))**

**September 1, 2024 through September 30, 2024**

<b>Expense Category</b>	<b>Total Expenses</b>
Computer Research (Westlaw/Lexis)	\$1,359.23
Court and Related Fees	\$259.50
Duplication	\$536.20
Filing, Registration, Fees & Taxes	\$155.26
Litigation Support	\$1,407.60
Meals	\$223.12
Outside Documents & Research	\$1.57
Postage, Courier & Freight	\$217.02
Travel	\$6,738.14
<b>Grand Total Expenses</b>	<b>\$10,897.64</b>

<b>DISBURSEMENT DETAIL</b>			
<b>Date</b>	<b>Expense Type</b>	<b>Description</b>	<b>Amount</b>
09/09/24	Computer research	LEXIS; SEARCH;ACCESS CHARGE	\$116.40
09/10/24	Computer research	LEXIS; US TREATISES;DOC ACCESS	\$335.08
09/11/24	Computer research	LEXIS; SEARCH;ACCESS CHARGE	\$58.20
09/11/24	Computer research	LEXIS; US TREATISES;DOC ACCESS	\$111.69
09/12/24	Computer research	Westlaw usage by SUN,TONY on 09/12/2024	\$409.50
09/12/24	Computer research	Westlaw usage by MILLS,MICHAEL on 09/12/2024	\$328.36
09/30/24	Court and related fees	VENDOR: Citizens Bank, Atty: A. Leary; Online Division of Revenue and Enterprise Svcs	\$42.50
09/30/24	Court and related fees	VENDOR: Citizens Bank, Atty: A. Leary; PayPal-Merchants Mobile Notary; Notary svc	\$217.00
09/05/24	Duplication	Requested by Tony Sun; 15 pages duplicated; Job ID 148407	\$2.25
09/05/24	Duplication	Requested by Tony Sun; 16 pages duplicated; Job ID 148426	\$2.40
09/05/24	Duplication	Requested by Tony Sun; 1050 color pages print; Job ID 148407	\$157.50
09/05/24	Duplication	Requested by Tony Sun; 1046 color pages print; Job ID 148426	\$156.90
09/05/24	Duplication	Requested by Tony Sun; 2 binders; Job ID 148426	\$4.00
09/05/24	Duplication	Requested by Tony Sun; 2 binders; Job ID 148407	\$4.00
09/11/24	Duplication	Requested by Nicholas D'Angelo; 172 color pages print; Job ID 148474	\$25.80
09/11/24	Duplication	Requested by Nicholas D'Angelo; 1 binders; Job ID 148474	\$2.00
09/12/24	Duplication	Requested by Nicholas D'Angelo; 174 color pages print; Job ID 148505	\$26.10
09/12/24	Duplication	Requested by Nicholas D'Angelo; 1 binders; Job ID 148505	\$2.00
09/16/24	Duplication	Requested by Nicholas D'Angelo; 24 pages duplicated; Job ID 148537	\$3.60

<b>DISBURSEMENT DETAIL</b>			
<b>Date</b>	<b>Expense Type</b>	<b>Description</b>	<b>Amount</b>
09/16/24	Duplication	Requested by Nicholas D'Angelo; 722 color pages print; Job ID 148537	\$108.30
09/16/24	Duplication	Requested by Nicholas D'Angelo; 1 binders; Job ID 148537	\$2.00
09/23/24	Duplication	Requested by Eric Wagner; 24 pages duplicated; Job ID 148621	\$3.60
09/23/24	Duplication	Requested by Eric Wagner; 225 color pages print; Job ID 148621	\$33.75
09/23/24	Duplication	Requested by Eric Wagner; 1 binders; Job ID 148621	\$2.00
09/30/24	Filing, registration, fees & taxes	VENDOR: Citizens Bank, Atty: A. Leary; Notary Svcs	\$155.26
09/04/24	Litigation Support	Lit Doc Mgt - Data Storage	\$1,407.60
09/05/24	Meals	Matlock, Tracy L., OT 6:34 PM, Chick Fil A, OT Dinner	\$27.07
09/05/24	Meals	Matlock, Tracy L., OT 6:30 PM, Starbucks, OT Dinner	\$7.35
09/05/24	Meals	G. Eck, 18:05:55, OT Dinner from Shake Shack	\$35.83
09/05/24	Meals	R.J. Steinberg, 21:13:37, OT Dinner from Spice	\$37.00
09/08/24	Meals	Payee: Resnick, Brian M., Hotel DU Pont, 9/9/2024, Hotel DU Pont	\$36.35
09/08/24	Meals	Payee: Resnick, Brian M., Hotel Dupont, 9/8/2024, Breakfast 1 Night	\$51.54
09/23/24	Meals	T.L. Matlock, 17:51:38, OT Dinner from Bobwhite Counter	\$27.98
09/04/24	Outside Documents & Research	courtlink: US DOCKETS DOC ACCESS For MARJORIE RICHMOND	\$1.57
09/05/24	Postage, courier & freight	From Tony Sun to James I McClammy, Fedex	\$100.74
09/13/24	Postage, courier & freight	From Catharine Mariampillai to Catharine Mariampillai, Fedex	\$28.12
09/17/24	Postage, courier & freight	From Catharine Mariampillai to Division Customer Service Coun/Division of Revenue and Enterp, Fedex	\$27.13
09/20/24	Postage, courier & freight	From Catharine Mariampillai to Catharine Mariampillai, Fedex	\$28.01

<b>DISBURSEMENT DETAIL</b>			
<b>Date</b>	<b>Expense Type</b>	<b>Description</b>	<b>Amount</b>
09/30/24	Postage, courier & freight	From Catharine Mariampillai to STEFANIE AICHHORN WOSS/SCHONHERR RECHTSANWALTE GMBH, Fedex	\$33.02
06/20/24	Travel	D. Klein, Car Service from Home to Wilmington, DE	\$602.56
06/20/24	Travel	B. Resnick, Car Service from Davis Polk offices to Wilmington, DE	\$877.96
07/24/24	Travel	Leary, Amber, OT 8:20 PM, OT Taxi	\$29.76
07/29/24	Travel	Leary, Amber, 7/29/2024, Lyft, OT Taxi from Morris Nichols offices to Wilmington, DE hotel	\$10.00
07/29/24	Travel	Leary, Amber, 7/29/2024, Curb, Davis Polk offices to Penn Station	\$34.44
08/18/24	Travel	Leary, Amber, 8/18/2024, Lyft, Home to Penn Station	\$59.00
09/05/24	Travel	Eck, Georgianna, OT Taxi from Davis Polk offices to Home	\$193.83
09/08/24	Travel	Leary, Amber, 9/8/2024, Amtrak, (B), Penn Station, Wilmington, DE	\$207.00
09/08/24	Travel	D'Angelo, Nicholas, 9/8/2024-9/9/2024, Hotel Du Pont	\$394.90
09/08/24	Travel	D'Angelo, Nicholas, 9/8/2024, , Amtrak, (B), NY Penn, Wilmington, DE	\$255.00
09/08/24	Travel	Leary, Amber, 9/8/2024, , Lyft, Client dinner, Hotel	\$10.00
09/08/24	Travel	D'Angelo, Nicholas, 9/8/2024, Lyft, Home to NY Penn	\$48.56
09/08/24	Travel	D'Angelo, Nicholas, 9/8/2024, Lyft, Wilmington, DE train station to Morris Nichols offices	\$9.25
09/08/24	Travel	Payee: NYP, WDE	\$190.00
09/08/24	Travel	Resnick, Brian M., 9/8/2024, Taxi, Lyft , 100 S French St, Wilmington, DE, 4 W 11th St, Wilmington, DE	\$10.68
09/08/24	Travel	Resnick, Brian M., 9/8/2024, Taxi, Uber, Home to New Rochelle train station	\$34.42
09/08/24	Travel	McClammy, James I., 9/8/2024-9/11/2024, Hearing in Delaware, Hotel Du Pont	\$1,579.60
09/08/24	Travel	Resnick, Brian M., 9/8/2024-9/9/2024, Hotel, Hotel Du Pont	\$394.90

<b>DISBURSEMENT DETAIL</b>			
<b>Date</b>	<b>Expense Type</b>	<b>Description</b>	<b>Amount</b>
09/08/24	Travel	Resnick, Brian M., 9/8/2024-9/9/2024, Hotel - N. D'Angelo, Hotel Du Pont	\$394.90
09/08/24	Travel	Resnick, Brian M., 9/8/2024-9/9/2024, Hotel - A. Leary, Hotel Du pont	\$394.90
09/08/24	Travel	Winiarski, Kevin L., 9/8/2024, , Amtrak, (C), New York City, Wilmington, DE	\$125.00
09/09/24	Travel	Winiarski, Kevin L., 9/9/2024-9/9/2024 Hotel Du Pont	\$394.90
09/09/24	Travel	D'Angelo, Nicholas, 9/9/2024 Lift, Market St., Wilmington, DE, King St., Wilmington, DE	\$13.90
09/09/24	Travel	Leary, Amber, 9/9/2024, Lyft, Court hearing, Hotel	\$6.00
09/09/24	Travel	D'Angelo, Nicholas, 9/9/2024 Amtrak, (B), Wilmington, DE, NY Penn	\$135.00
09/09/24	Travel	D'Angelo, Nicholas, 9/9/2024 Curb, NY Penn to Home	\$28.64
09/09/24	Travel	Leary, Amber, 9/9/2024, Amtrak, (B), Wilmington, DE, Penn Station	\$135.00
09/24/24	Travel	Matlock Tracy, 1221am, OT Taxi from Davis Polk offices to home	\$168.04
<b>TOTAL</b>			<b>\$10,897.64</b>