

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

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In re:	)	
	)	Chapter 11
	)	
FISKER INC., <i>et al.</i> ,	)	Case No. 24-11390 (TMH)
	)	
Debtors. <sup>1</sup>	)	(Jointly Administered)
	)	
	)	Hearing Date: December 9, 2024, at 11:00 a.m. (ET)
	)	Objection Deadline: December 2, 2024, at 4:00 p.m. (ET)

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**SUMMARY OF COMBINED FOURTH MONTHLY AND FINAL FEE  
APPLICATION OF COLE SCHOTZ P.C., DELAWARE CO-COUNSEL  
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE MONTHLY PERIOD FROM OCTOBER 1, 2024 THROUGH OCTOBER 17,  
2024 AND THE FINAL PERIOD FROM JULY 4, 2024 THROUGH OCTOBER 17, 2024**

Name of Applicant:	<b>Cole Schotz, P.C.</b>
Authorized to provide professional services to:	<b>Official Committee of Unsecured Creditors</b>
Date of retention:	<b>August 6, 2024 (Effective as of July 4, 2024) [D.I. 384]</b>
Monthly Period for which compensation and reimbursement is sought:	<b>October 1, 2024 through October 17, 2024</b>
Amount of compensation sought as actual, reasonable and necessary for Monthly Period:	<b>\$31,673.20 (80% of \$39,591.50)</b>
Amount of expense reimbursement sought as actual, reasonable and necessary for Monthly Period:	<b>\$1,883.42</b>
Final Period for which final compensation	

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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.



and reimbursement is sought

**July 4, 2024 through October 17, 2024**

Amount of compensation sought as actual, reasonable and necessary for Final Period:

**\$492,500.00<sup>2</sup>**

Amount of expense reimbursement sought as actual, reasonable and necessary for Final Period:

**\$14,109.86**

This is a(n):

X  monthly   interim  X  final application

**Prior Fee Applications Filed:**

<b>Application/ D.I. No.</b>	<b>Date Filed</b>	<b>Period Covered</b>	<b>Requested Fees/Expenses</b>	<b>Allowed Fees / Expenses</b>
First Monthly Application [D.I. 509]	9/3/2024	7/4/2024 – 7/31/2024	\$294,966.00 / \$10,744.60	\$235,972.80 / \$10,744.60
Second Monthly Application [D.I. 592]	9/24/2024	8/1/2024 – 8/31/2024	\$85,180.50 / \$1,405.41	\$68,144.40 / \$1,405.41
Third Monthly Application [D.I. 592]	10/25/2024	9/1/2024 – 9/30/2024	\$47,762.00 / \$267.81	\$32,209.60 / \$267.81 <sup>3</sup>
<b>TOTAL</b>			\$427,908.50 / \$12,417.82	\$336,326.80 / \$12,417.82

<sup>2</sup> This amount includes an estimated \$25,000 in additional fees and expenses incurred after October 17, 2024 in connection with (i) preparing this Application; (ii) responding to objections to this Application, if any; and (iii) attending the hearing thereon. Cole Schotz reserves the right to seek additional amounts for fees and expenses incurred after October 17, 2024 if not accounted for herein, and in preparing this Application and reviewing the final fee applications of other professionals.

<sup>3</sup> The objection deadline for the Third Monthly Application expired on November 8, 2024, and no objections have been filed. On November 11, 2024, Cole Schotz filed the *Certification of No Objection Regarding Third Monthly Fee Application of Cole Schotz P.C., Delaware Co-Counsel to the Committee, for Allowance of Compensation and Reimbursement of Expenses for the Period from September 1, 2024 Through September 30, 2024* [D.I. 775]. Accordingly, pursuant to the Interim Compensation Order, these fees are allowed, but have not yet been paid.

**FISKER INC., ET AL.**

**SUMMARY OF BILLING BY PROFESSIONAL  
FOR THE MONTHLY PERIOD FROM  
OCTOBER 1, 2024 THROUGH OCTOBER 17, 2024**

<b>Name of Professional Person</b>	<b>Year Admitted</b>	<b>Position with the Applicant</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Justin R. Alberto	2008	Member (Bankruptcy)	\$925.00	8.2	\$7,585.00
Patrick J. Reilley	2003	Member (Bankruptcy)	\$900.00	2.4	\$2,160.00
Stacy L. Newman	2007	Member (Bankruptcy)	\$800.00	19.7	\$15,760.00
Michael E. Fitzpatrick	2022	Associate (Bankruptcy)	\$575.00	13.2	\$7,590.00
Melissa M. Hartlipp	2022	Associate (Bankruptcy)	\$430.00	6.6	\$2,838.00
Julie A. Aberasturi	2022	Associate (Bankruptcy)	\$430.00	0.4	\$172.00
Michael A. Solimani	N/A	Law Clerk	\$405.00	1.3	\$526.50
Larry S. Morton	N/A	Paralegal (Bankruptcy)	\$400.00	7.4	\$2,960.00
<b>TOTAL</b>				<b>59.2</b>	<b>\$39,591.50</b>

**FISKER INC., ET AL.****SUMMARY OF COMPENSATION BY PROJECT CATEGORY  
FOR THE MONTHLY PERIOD FROM  
OCTOBER 1, 2024 THROUGH OCTOBER 17, 2024**

<b>PROJECT CATEGORY</b>	<b>TOTAL HOURS</b>	<b>TOTAL FEES</b>
Asset Dispositions, Sales, Uses and Leases	0.1	\$92.50
Case Administration	12.1	\$8,611.00
Committee Matters and Creditor Meetings	3.9	\$2,448.50
Creditor Inquiries	0.2	\$185.00
Executory Contracts	0.5	\$437.50
Fee Application Matters/Objections	3.7	\$2,103.00
Litigation	0.3	\$277.50
Preparation for and Attendance at Hearings	18.0	\$9,330.50
Reorganization Plan	20.4	\$16,106.00
<b>TOTAL</b>	<b>59.2</b>	<b>\$39,591.50</b>

**FISKER INC., ET AL.****EXPENSE SUMMARY  
FOR THE MONTHLY PERIOD FROM  
OCTOBER 1, 2024 THROUGH OCTOBER 17, 2024**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Court Fees	PACER	\$66.30
Courier Service	Reliable/Parcels	\$1,450.70
Postage		\$9.92
Breakfast/Lunch/Dinner Conferences for Hearings		\$356.50
<b>TOTAL</b>		<b>\$1,883.42</b>

**FIKSKER INC., et al.****SUMMARY OF BILLING BY PROFESSIONAL  
FOR THE FINAL PERIOD FROM  
JULY 4, 2024 THROUGH OCTOBER 17, 2024**

<b>Name of Professional Person</b>	<b>Year Admitted</b>	<b>Position with the Applicant</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Justin R. Alberto	2008	Member (Bankruptcy)	\$830.00	122.0	\$101,260.00
			\$925.00	24.7	\$22,847.50
Patrick J. Reilley	2003	Member (Bankruptcy)	\$805.00	39.2	\$31,556.00
			\$900.00	6.8	\$6,120.00
Christopher Gagic	1997	Member (Tax, Trusts & Estates)	\$650.00	5.9	\$3,835.00
Stacy L. Newman	2007	Member (Bankruptcy)	\$725.00	107.6	\$78,010.00
			\$800.00	38.5	\$30,800.00
Jamie P. Clare	1994	Member (Litigation, Construction & Employment)	\$780.00	7.6	\$5,928.00
Mark Tsukerman	2010	Member (Bankruptcy)	\$700.00	5.7	\$3,990.00
Jonathan R. Friedman	2019	Associate (Bankruptcy)	\$550.00	7.7	\$4,235.00
Jack M. Dougherty	2021	Associate (Bankruptcy)	\$500.00	32.9	\$16,450.00
Michael E. Fitzpatrick	2022	Associate (Bankruptcy)	\$500.00	146.8	\$73,400.00
			\$575.00	16.9	\$9,717.50
Raquel S. Zeitlin	2020	Associate (Tax)	\$420.00	8.0	\$3,360.00
Melissa M. Hartlipp	2022	Associate (Bankruptcy)	\$385.00	90.5	\$34,842.50
			\$430.00	20.7	\$8,901.00
Julie A. Aberasturi	2022	Associate (Bankruptcy)	\$430.00	0.4	\$172.00
Matthew M. Love	2022	Associate (Real Estate)	\$400.00	8.1	\$3,240.00
Michael A. Solimani	N/A	Law Clerk	\$405.00	1.3	\$526.50

<b>Name of Professional Person</b>	<b>Year Admitted</b>	<b>Position with the Applicant</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Larry S. Morton	N/A	Paralegal (Bankruptcy)	\$380.00	49.9	\$18,962.00
			\$400.00	15.2	\$5,920.00
Pauline Z. Ratkowiak	N/A	Paralegal (Bankruptcy)	\$385.00	2.8	\$1,078.00
			\$405.00	5.8	\$2,349.00
<b>TOTAL</b>				<b>765.0</b>	<b>\$467,500.00</b>

**Total Requested Compensation: \$492,500.00<sup>4</sup>**  
**Total Attorney Compensation: \$439,191.00**  
**Blended Rate All Attorneys: \$635.31**  
**Blended Rate All Timekeepers: \$611.11**

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<sup>4</sup> This amount includes an estimated \$25,000 in additional fees and expenses incurred after October 17, 2024 in connection with (i) preparing this Application; (ii) responding to objections to this Application, if any; and (iii) attending the hearing thereon. Cole Schotz reserves the right to seek additional amounts for fees and expenses incurred after October 17, 2024 if not accounted for herein, and in preparing this Application and reviewing the final fee applications of other professionals.

**FISKER INC., et al.**

**SUMMARY OF COMPENSATION BY PROJECT CATEGORY  
FOR THE FINAL PERIOD FROM  
JULY 4, 2024 THROUGH OCTOBER 17, 2024**

<b>PROJECT CATEGORY</b>	<b>TOTAL HOURS</b>	<b>TOTAL FEES</b>
Asset Dispositions, Sales, Uses and Leases	19.5	\$14,348.00
Automatic Stay Matters/Litigation	4.3	\$3,186.50
Case Administration	126.8	\$80,638.00
Cash Collateral and DIP Financing	25.9	\$18,241.00
Claims Analysis	2.0	\$1,424.50
Committee Matters and Creditor Meetings	66.1	\$47,277.50
Creditor Inquiries	1.2	\$950.50
Disclosure Statement/Voting Issues	1.9	\$1,607.00
Executory Contracts	1.6	\$1,284.00
Fee Application Matters/Objections	31.9	\$16,862.50
Leases (Real Property)	2.1	\$1,447.50
Litigation	262.1	\$154,885.50
Preparation for and Attendance at Hearings	120.9	\$63,514.50
Reorganization Plan	34.4	\$27,533.50
Retention Matters	64.1	\$34,121.50
U.S. Trustee Matters and Meetings	0.2	\$133.00
<b>TOTAL</b>	<b>765.0</b>	<b>\$467,455.00</b>



**FISKER INC., et al.**

**EXPENSE SUMMARY  
FOR THE FINAL PERIOD FROM  
JULY 4, 2024 THROUGH OCTOBER 17, 2024**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Photocopying/Printing/Scanning (2,724 pages @ \$0.10/page)		\$272.40
Court Fees	PACER	\$195.70
Online Research	Westlaw/Lexis	\$599.97
Filing Fees		\$500.00
Outside Printing	Reliable/Parcels	\$9,499.41
Courier Service	Reliable/Parcels	\$1,705.70
Postage		\$168.00
Breakfast/Lunch/Dinner Conferences for Hearings		\$1,086.33
Transcripts		\$82.35
<b>TOTAL</b>		<b>\$14,109.86</b>

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

	)	
In re:	)	Chapter 11
	)	
FISKER INC., <i>et al.</i> ,	)	Case No. 24-11390 (TMH)
	)	
Debtors. <sup>1</sup>	)	(Jointly Administered)
	)	
	)	Hearing Date: December 9, 2024, at 11:00 a.m. (ET)
	)	Objection Deadline: December 2, 2024, at 4:00 p.m. (ET)

**COMBINED FOURTH MONTHLY  
AND FINAL FEE APPLICATION OF COLE SCHOTZ P.C., DELAWARE  
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,  
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE MONTHLY PERIOD FROM OCTOBER 1, 2024 THROUGH OCTOBER 17,  
2024 AND THE FINAL PERIOD FROM JULY 4, 2024 THROUGH OCTOBER 17, 2024**

Cole Schotz P.C. (the “Applicant” or “Cole Schotz”), Delaware co-counsel to the Official Committee of Unsecured Creditors (the “Committee”) of Fisker Inc., *et al.*, and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), hereby submits this application (the “Application”) pursuant to (i) sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), (ii) Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), (iii) Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and (iv) the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [D.I. 350] (the “Interim Compensation Order”),<sup>2</sup> for

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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 not defined herein shall have the meanings ascribed to them in the Interim Compensation Order or the fourth amended *Combined Disclosure Statement and Chapter 11 Plan of Liquidation of Fisker Inc. and its Debtor Affiliates* [D.I. 713] (the “Plan”), as applicable.

allowance of compensation for services rendered and reimbursement of expenses for the monthly period from October 1, 2024 through October 17, 2024 (the “Monthly Period”) and the final period from July 4, 2024 through October 17, 2024 (the “Final Period”). In support of this Application, Cole Schotz respectfully represents as follows:

### **JURISDICTION AND VENUE**

1. The Court has jurisdiction to consider the Application pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

2. Pursuant to Local Rule 9013-1(f), the Committee consents to entry of final orders or judgments by the Court if it is determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

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

### **BACKGROUND**

#### **A. The Chapter 11 Cases**

4. On June 17 and 19, 2024 (collectively, the “Petition Date”), each of the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. These Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b). Since the Petition Date, the Debtors have remained in possession of their assets and have continued to operate and manage their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. On July 2, 2024, the Office of the United States Trustee for Region 3 (the “U.S. Trustee”) appointed a seven-member Committee consisting of: (i) U.S. Bank Trust National Association; (ii) Avnet, Inc.; (iii) Magna International, Inc.; (iv) Keyframe Capital

Partners, L.P.; (v) T-Mobile US, Inc.; (vi) Cristian Fleming; and (vii) Mouri Tech LLC. *See* D.I. 106.

**B. The Retention of Cole Schotz**

6. On July 19, 2024, the Committee applied to the Court for an order authorizing the retention and employment of Cole Schotz as Delaware co-counsel to the Committee, effective as of July 4, 2024. *See* D.I. 257.

7. On August 6, 2024, the Court entered the *Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 Authorizing and Approving the Retention and Employment of Cole Schotz P.C. as Delaware Co-Counsel to the Official Committee of Unsecured Creditors Effective as of July 4, 2024* authorizing the retention and employment of Cole Schotz as Delaware co-counsel to the Committee. *See* D.I. 384.

**C. The Interim Compensation Order**

8. The Interim Compensation Order sets forth the procedures for interim compensation and reimbursement of expenses in these Chapter 11 Cases. Specifically, the Interim Compensation Order provides that on or after the second day of each month following the month for which compensation is sought, each Retained Professional seeking compensation may file a monthly fee statement (each, a “Monthly Fee Statement”) for interim allowance of compensation for services rendered and reimbursement of expenses incurred during the preceding month and serve such Monthly Fee Statement on the Compensation Notice Parties. Provided that there are no objections to the Monthly Fee Statement filed within fourteen (14) days after service of a Monthly Fee Statement, a Retained Professional may file a certificate of no objection with the Court with respect to the unopposed portion of the compensation and expenses requested in its Monthly Fee Statement, after which the Debtors are authorized and

directed to pay such Retained Professional eighty percent (80%) of the fees and one-hundred percent (100%) of the expenses requested in such Monthly Fee Statement.

9. Additionally, pursuant to the Interim Compensation Order, Retained Professionals are required to file Final Fee Applications on or before the deadline set in a confirmed chapter 11 plan or an order of the Court.

**D. The Plan and Confirmation Order**

10. On October 15, 2024, the Debtors filed the Plan.

11. On October 16, 2024, the Court entered *Findings of Fact, Conclusions of Law, and Order, Approving the Disclosure Statement on a Final Basis, Confirming the Debtors' Joint Chapter 11 Plan of Liquidation, and Granting Related Relief* (the "Confirmation Order") [D.I. 722].

12. On October 17, 2024, the Debtors filed the *Notice of (I) Effective Date of Combined Disclosure Statement and Chapter 11 Plan of Liquidation of Fisker Inc. and its Debtor Affiliates and (II) Certain Claims Bar Dates* [D.I. 730] (the "Effective Date Notice"), and the Plan became effective in accordance with its terms.

13. Pursuant to the confirmed Plan, and as set forth in the Effective Date Notice, each Retained Professional who holds or asserts a Professional Fee Claim is required to file with the Court, and serve on all parties required to receive notice, a Final Fee Application within forty-five days after the Effective Date (*i.e.* Monday, December 2, 2024), for final Allowance of compensation for the services rendered and reimbursement of expenses incurred.

**RELIEF REQUESTED**

14. By this Application, and pursuant to the Interim Compensation Order, the Plan, and sections 330 and 331 of the Bankruptcy Code, Cole Schotz is seeking: (i) compensation in the amount of \$31,673.20, which is equal to eighty percent (80%) of the \$39,591.50 in fees for

professional services rendered by Cole Schotz during the Monthly Period and (ii) compensation in the amount of \$492,500.00<sup>3</sup> in fees for professional services rendered by Cole Schotz during the Final Period. This amount is derived solely from the applicable hourly billing rates of Cole Schotz personnel who rendered such services to the Committee. In addition, Cole Schotz is seeking reimbursement of expenses incurred during: (i) the Monthly Period in the amount of \$1,883.42 and (ii) the Final Period in the amount of \$14,109.86.

**A. Compensation Requested**

15. Attached hereto as **Exhibit A** is a detailed itemization, by project category, of all services performed by Cole Schotz with respect to the Chapter 11 Cases during the Monthly Period and Final Period. This detailed itemization complies with Local Rule 2016-2(d) in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of the activity, all time is billed in increments of one-tenth of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified. *See* DEL. BANKR. L.R. 2016-2(d).

16. The attorneys and professionals who rendered services related to each category are identified in **Exhibit A**, along with the number of hours for each individual and the total compensation.

**B. Expense Reimbursement**

17. Cole Schotz incurred out-of-pocket expenses during: (i) the Monthly Period in the amount of \$1,883.42 and (ii) the Final Period in the amount of \$14,109.86. Attached hereto as **Exhibit B** is a description of the expenses actually incurred by Cole Schotz in the performance

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<sup>3</sup> This amount includes an estimated \$25,000 in additional fees and expenses incurred after October 17, 2024 in connection with (i) preparing this Application; (ii) responding to objections to this Application, if any; and (iii) attending the hearing thereon. Cole Schotz reserves the right to seek additional amounts for fees and expenses incurred after October 17, 2024 if not accounted for herein, and in preparing this Application and reviewing the final fee applications of other professionals.

of services rendered as counsel to the Committee. The expenses are broken down into categories of charges, including, among other things, the following charges: photocopying, scanning and printing, telecopy, telephone, Court fees, transcription charges, filing fees, telephonic appearances, legal research and other non-ordinary expenses. *See* DEL. BANKR. L.R. 2016-2(e).<sup>4</sup>

**THE APPLICATION AND COMPLIANCE WITH GUIDELINES**

18. This Application was prepared in accordance with (a) Local Rule 2016-2, (b) the United States Trustee *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, adopted on June 11, 2013 (the “UST Guidelines”), and (c) the Interim Compensation Order (collectively with Local Rule 2016-2 and the UST Guidelines, the “Guidelines”).

19. In addition to the summary of billing by project category and summary of billing by professional attached to the Application as **Exhibit A** and summary of expenses attached to the Application as **Exhibit B**, annexed hereto as **Exhibit C** are the other various schedules required by the Guidelines, as applicable.

20. Cole Schotz provides the following responses to the questions set forth under ¶ C.5 of Appendix B of the UST Guidelines:

**Question:** Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

**Response:** No. Cole Schotz professionals working on this matter billed at Cole Schotz’s standard hourly rates.

**Question:** If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or

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<sup>4</sup> In accordance with Local Rule 2016-2(e)(iii), Cole Schotz does not charge more than \$0.10 per page for photocopies, does not charge for incoming facsimile transmissions, and does not charge more than \$0.25 per page for outgoing facsimiles. Applicant does not surcharge for computerized research. DEL. BANKR. L.R. 2016-2(e)(iii).

more, did you discuss the reasons for the variation with the client?

Response: The fees sought in this Application are less than the amount budgeted for the Final Period.

Question: Have any of the professionals included in this fee application varied their hourly rates based on the geographic location of the bankruptcy case.

Response: No.

Question: Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? If so, please quantify by hours and fees.

Response: No.

Question: Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: No.

Question: Does this fee application include rate increases since retention?

Response: Yes.

### **REASONABLE AND NECESSARY SERVICES**

21. The services for which Cole Schotz seeks compensation were, at the time rendered, necessary for, beneficial to and in the best interests of the Committee and the Debtors' estates. The services rendered were consistently performed in a timely manner commensurate with the complexity, importance and nature of the issues involved. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Cole Schotz is fair and reasonable given (a) the complexity of these Chapter 11 Cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.



**CERTIFICATION OF COMPLIANCE AND WAIVER**

22. The undersigned representative of Cole Schotz certifies that he has reviewed the requirements of Local Rule 2016-2, and that the Application substantially complies with that Local Rule. To the extent that the Application does not comply in all respects with the requirements of Local Rule 2016-2, Cole Schotz believes that such deviations are not material and respectfully requests that any such requirements be waived.

**NOTICE**

23. Cole Schotz will provide notice of this Application by electronic mail to: (i) the Debtors; (ii) counsel for the Debtors; (iii) the U.S. Trustee; and (iv) all parties in interest required to receive notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, Cole Schotz submits that no other or further notice is required.

**CONCLUSION**

**WHEREFORE**, Cole Schotz respectfully requests the Court enter an order: (i) granting the Application and authorizing monthly allowance of compensation in the amount of \$31,673.20 (80% of \$39,591.50) for professional services rendered, and reimbursement of actual and necessary costs in the amount of \$1,883.42 incurred, during the Monthly Period; (ii) granting the Application and authorizing final allowance of compensation in the amount of \$492,500.00 for professional services rendered, and reimbursement of actual and necessary costs in the amount of \$14,109.86 incurred, during the Final Period; (iii) authorizing the payment of the amounts requested in the Application; and (iv) granting such other and further relief as the Court may deem just and proper.

*[Remainder of Page Intentionally Left Blank]*

Dated: November 11, 2024

*/s/ Justin R. Alberto*

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**COLE SCHOTZ P.C.**

Justin R. Alberto (No. 5126)

Patrick J. Reilley (No. 4451)

Stacy L. Newman (No. 5044)

Michael E. Fitzpatrick (No. 6797)

500 Delaware Avenue, Suite 1410

Wilmington, DE 19801

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

**Exhibit A****FISKER INC., ET AL.****SUMMARY OF BILLING BY PROFESSIONAL  
FOR THE MONTHLY PERIOD FROM  
OCTOBER 1, 2024 THROUGH OCTOBER 17, 2024**

<b>Name of Professional Person</b>	<b>Year Admitted</b>	<b>Position with the Applicant</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Justin R. Alberto	2008	Member (Bankruptcy)	\$925.00	8.2	\$7,585.00
Patrick J. Reilley	2003	Member (Bankruptcy)	\$900.00	2.4	\$2,160.00
Stacy L. Newman	2007	Member (Bankruptcy)	\$800.00	19.7	\$15,760.00
Michael E. Fitzpatrick	2022	Associate (Bankruptcy)	\$575.00	13.2	\$7,590.00
Melissa M. Hartlipp	2022	Associate (Bankruptcy)	\$430.00	6.6	\$2,838.00
Julie A. Aberasturi	2022	Associate (Bankruptcy)	\$430.00	0.4	\$172.00
Michael A. Solimani	N/A	Law Clerk	\$405.00	1.3	\$526.50
Larry S. Morton	N/A	Paralegal (Bankruptcy)	\$400.00	7.4	\$2,960.00
<b>TOTAL</b>				<b>59.2</b>	<b>\$39,591.50</b>

**FISKER INC., ET AL.**

**SUMMARY OF COMPENSATION BY PROJECT CATEGORY  
FOR THE MONTHLY PERIOD FROM  
OCTOBER 1, 2024 THROUGH OCTOBER 17, 2024**

<b>PROJECT CATEGORY</b>	<b>TOTAL HOURS</b>	<b>TOTAL FEES</b>
Asset Dispositions, Sales, Uses and Leases	0.1	\$92.50
Case Administration	12.1	\$8,611.00
Committee Matters and Creditor Meetings	3.9	\$2,448.50
Creditor Inquiries	0.2	\$185.00
Executory Contracts	0.5	\$437.50
Fee Application Matters/Objections	3.7	\$2,103.00
Litigation	0.3	\$277.50
Preparation for and Attendance at Hearings	18.0	\$9,330.50
Reorganization Plan	20.4	\$16,106.00
<b>TOTAL</b>	<b>59.2</b>	<b>\$39,591.50</b>



FISKER AUTOMOTIVE, INC.  
 C/O VERITA  
 222 N. PACIFIC COAST HIGHWAY, SUITE 300  
 EL SEGUNDO, CA 90245

Invoice Date: November 11, 2024  
 Invoice Number: 991565  
 Matter Number: 68099-0001

**Re:** OFFICIAL COMMITTEE OF UNSECURED CREDITORS

FOR PROFESSIONAL SERVICES THROUGH OCTOBER 17, 2024

**ASSET DISPOSITIONS, SALES, USES, AND LEASES (SECTION 363) 0.10 92.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/04/24	JRA	REVIEW NOTICE OF DE MINIMIS ASSET SALE	0.10	92.50

**CASE ADMINISTRATION 12.10 8,611.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/03/24	SLN	CORRESPONDENCE WITH DEBTORS REGARDING TOCCATA SANCTIONS MOTION (.1); REVIEW DEBTORS MOTION FOR SANCTIONS AGAINST TOCCATA, DECLARATION AND MOTION TO SHORTEN NOTICE (.9);	1.00	800.00
10/03/24	MMH	CORRESPONDENCE WITH E. GREENHAUS RE: BUDGET ISSUES	0.10	43.00
10/03/24	MMH	CORRESPONDENCE WITH M3 RE: CLOSING ITEMS	0.10	43.00
10/04/24	SLN	REVIEW ORDER SHORTENING NOTICE OF TOCCATA MOTION (.1);	0.10	80.00
10/04/24	MMH	CORRESPONDENCE WITH M3 RE: BUDGET AND CLOSING ITEMS	0.10	43.00
10/04/24	MMH	CORRESPONDENCE WITH ACCOUNTING RE: BUDGET ISSUES	0.10	43.00
10/07/24	SLN	CORRESPONDENCE WITH CS TEAM REGARDING 10/9 HEARING (.1); REVIEW AGENDA FOR 10/9 HEARING (.1); REVIEW TOCCATA OPPOSITION TO CONTEMPT MOTION (.3); REVIEW HARRISON MOTION TO STRIKE DEPOSITION NOTICE (.1);	0.60	480.00
10/07/24	MMH	CORRESPONDENCE WITH J. ALBERTO RE: BUDGET ISSUES	0.20	86.00
10/07/24	LSM	UPDATE BANKRUPTCY CASE CALENDAR WITH OBJECTION/FILING DEADLINES AND HEARING DATE.	0.30	120.00
10/08/24	SLN	CORRESPONDENCE WITH CS TEAM REGARDING 10/9 HEARING (.1); REVIEW SHAREHOLDER MOTION TO UNSEAL COMMITTEE CONVERSION MOTION (.1); DEBTOR OBJECTION TO TOCCATA MOTION (.3);	0.50	400.00
10/08/24	LSM	ARRANGE TELEPHONIC APPEARANCES FOR NINE ATTORNEYS FOR OCTOBER 9, 2024 HEARING	0.60	240.00

**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/09/24	SLN	REVIEW AMENDED AGENDA (.1); PREP FOR AND ATTEND HEARING AND CONTINUED HEARING (2.4);	2.50	2,000.00
10/09/24	MMH	CORRESPONDENCE WITH H. YAN RE: OBJECTION TO COMMITTEE'S SEALING MOTION	0.20	86.00
10/10/24	SLN	REVIEW SHAREHOLDER MOTION TO UNSEAL UCC CONVERSION OBJECTION (.1); CORRESPONDENCE WITH CS TEAM (.1);	0.20	160.00
10/10/24	SLN	PREPARE FOR AND ATTEND HEARING (1.4); CORRESPONDENCE WITH UCC REGARDING HEARING (.2);	1.60	1,280.00
10/10/24	MMH	CONFER WITH H. YAN RE: MOTION TO UNSEAL RESPONSE	0.10	43.00
10/10/24	MMH	CONFER WITH S. NEWMAN RE: MOTION TO UNSEAL ISSUES	0.10	43.00
10/10/24	MMH	REVIEW MOTION TO UNSEAL	0.20	86.00
10/10/24	LSM	ARRANGE TELEPHONIC APPEARANCE FOR S. NEWMAN FOR OCTOBER 10, 2024 HEARING	0.20	80.00
10/11/24	SLN	PREP FOR AND ATTENDANCE AT HEARING (2.3);	2.30	1,840.00
10/14/24	SLN	REVIEW POST-EFFECTIVE WORKSTREAMS (.2);	0.20	160.00
10/15/24	MMH	CORRESPONDENCE WITH M3 RE: BUDGET ISSUES	0.10	43.00
10/15/24	MMH	CORRESPONDENCE WITH M3 RE: BUDGET ISSUES	0.20	86.00
10/16/24	SLN	REVIEW TOCCATA NOTICE OF APPEAL (.1); REVIEW MOTION TO STAY PENDING APPEAL (.1);	0.20	160.00
10/16/24	MMH	CORRESPONDENCE WITH M. RUSSELL AND H. YAN RE: MOTION TO SEAL	0.20	86.00
10/17/24	SLN	REVIEW NOTICE OF EFFECTIVE DATE (.1);	0.10	80.00

**COMMITTEE MATTERS AND CREDITOR MEETINGS**

**3.90 2,448.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/02/24	SLN	CORRESPONDENCE WITH UCC (.1); REVIEW AGENDA FOR UCC CALL (.1);	0.20	160.00
10/03/24	SLN	ATTENDANCE AT UCC MEETING (.4); CORRESPONDENCE WITH UCC REGARDING TOCCATA (.1);	0.50	400.00
10/03/24	MEF	REVIEW H. YAN COMMITTEE UPDATE EMAIL	0.10	57.50
10/07/24	SLN	CORRESPONDENCE WITH UCC REGARDING CONFIRMATION (.1);	0.10	80.00
10/09/24	SLN	CORRESPONDENCE WITH UCC REGARDING HEARING (.2);	0.20	160.00
10/09/24	MMH	CORRESPONDENCE WITH COMMITTEE MEMBER RE: DIAL-IN INFORMATION	0.10	43.00
10/09/24	MAS	RUN BRIDGE HEARING LINE RE: CONFIRMATION HEARING	1.30	526.50
10/09/24	JRA	EMAIL WITH H. YAN RE CONFIRMATION HEARING UPDATE	0.10	92.50
10/10/24	SLN	CORRESPONDENCE WITH UCC REGARDING HEARING AND VOTING REPORT (X3) (.2);	0.20	160.00
10/11/24	SLN	CORRESPONDENCE WITH UCC REGARDING CONFIRMATION (X3) (.2);	0.20	160.00
10/15/24	SLN	CORRESPONDENCE WITH UCC (.1);	0.10	80.00

**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/16/24	SLN	CORRESPONDENCE WITH UCC (.1);	0.10	80.00
10/17/24	SLN	ATTENDANCE AT UCC CALL (.3); CORRESPONDENCE WITH UCC REGARDING EFFECTIVE DATE AND BAR DATES (.1);	0.40	320.00
10/17/24	MMH	ATTEND COMMITTEE CALL	0.30	129.00

**CREDITOR INQUIRIES** **0.20** **185.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/04/24	JRA	REVIEW CREDITOR INQUIRY EMAILS	0.20	185.00

**EXECUTORY CONTRACTS** **0.50** **437.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/04/24	JRA	REVIEW SHAMROCK REJECTION NOTICE OBJECTION	0.30	277.50
10/04/24	SLN	REVIEW SHAMROCK OBJECTION TO REJECTION NOTICE (.2):	0.20	160.00

**FEE APPLICATION MATTERS/OBJECTIONS** **3.70** **2,103.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/04/24	MEF	EMAILS AND CALL W/ M. RUSSEL RE: COMMITTEE FEE APPS AND FILING TIMELINE	0.40	230.00
10/07/24	JRA	EMAILS WITH M. FITZPATRICK RE FEE APPS	0.10	92.50
10/07/24	MEF	EMAILS W/ US TRUSTEE RE: COLE SCHOTZ LEDES FILE	0.10	57.50
10/07/24	MEF	BEGIN DRAFTING COLE SCHOTZ THIRD MONTHLY FEE APPLICATION AND CONF. W/ P. REILLEY RE SAME	0.40	230.00
10/09/24	SLN	CORRESPONDENCE WITH CS TEAM REGARDING FEE APPLICATIONS (.1);	0.10	80.00
10/09/24	PJR	EMAILS TO AND FROM S. NEWMAN AND M. FITZPATRICK RE: FEE ISSUES	0.10	90.00
10/09/24	MEF	EMAILS W/ S. NEWMAN AND P. REILLEY RE: CNOS TO CS FEE APP	0.10	57.50
10/10/24	MMH	CORRESPONDENCE WITH M. FITZPATRICK RE: FEE APP	0.10	43.00
10/10/24	MEF	CONT. DRAFTING COLE SCHOTZ THIRD MONTHLY FEE APPLICATION AND EMAILS W/ M. HARTLIPP RE SAME	1.10	632.50
10/11/24	MMH	CONTINUE DRAFTING CS SEP. FEE APP	0.50	215.00
10/13/24	SLN	CORRESPONDENCE WITH PROFESSIONALS REGARDING FEES (.1);	0.10	80.00
10/14/24	SLN	CORRESPONDENCE WITH MOFO REGARDING FEE APPLICATIONS (.1);	0.10	80.00
10/14/24	MMH	CORRESPONDENCE WITH H. YAN RE: FINAL FEE APP	0.20	86.00
10/14/24	MMH	ANALYZE LOCAL RULES RE: FINAL FEE APP	0.20	86.00
10/17/24	MMH	CORRESPONDENCE WITH S. NEWMAN RE: FINAL FEE APP	0.10	43.00

**LITIGATION/ GEN. (EXCEPT AUTOMATIC STAY RELIEF)** **0.30** **277.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
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**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/08/24	JRA	EMAIL WITH B. DOLPHIN RE HARRISON DEPOSITION	0.10	92.50
10/09/24	JRA	REVIEW SECOND MOTION TO UNSEAL AND EMAILS WITH S. NEWMAN RE SAME	0.20	185.00
<b>PREPARATION FOR AND ATTENDANCE AT HEARINGS</b>			<b>18.00</b>	<b>9,330.50</b>

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/07/24	JRA	REVIEW 10/9 HEARING AGENDA	0.10	92.50
10/07/24	JRA	CORRESPOND WITH S. NEWMAN RE CONFIRMATION HEARING	0.20	185.00
10/07/24	JRA	REVIEW AGENDA FOR CONFIRMATION HEARING	0.10	92.50
10/07/24	LSM	ASSIST WITH HEARING PREPARATIONS FOR OCTOBER 9, 2024 HEARING	0.90	360.00
10/07/24	LSM	COMPILE, REVIEW AND CIRCULATE TO CS TEAM THE AGENDA FOR THE OCTOBER 9, 2024 HEARING	0.30	120.00
10/08/24	MMH	COORDINATE BRIDGE LINE LOGISTICS	0.10	43.00
10/08/24	MMH	CORRESPONDENCE WITH MOFO TEAM RE: HEARING LOGISTICS	0.10	43.00
10/08/24	LSM	ASSIST WITH HEARING PREPARATIONS FOR S. NEWMAN REGARDING OCTOBER 9, 2024 HEARING	0.50	200.00
10/08/24	LSM	ASSIST WITH ASSEMBLE OF HEARING BINDERS FOR OCTOBER 9, 2024 HEARING	0.90	360.00
10/08/24	MEF	EMAILS W/ S. NEWMAN RE: CONFIRMATION HEARING LOGISTICS AND BINDER PREP	0.20	115.00
10/08/24	MEF	EMAILS W/ L. MORTON RE: HEARING SIGNUP/LOGISTICS	0.10	57.50
10/09/24	JAA	OPERATE DIAL IN LINE FOR HEARING	0.40	172.00
10/09/24	MMH	REGISTER CS AND MOFO TEAM FOR 10/10 HEARING	0.20	86.00
10/09/24	MMH	COORDINATE PREPARATION OF HEARING BINDERS WITH RECENT FILINGS	0.60	258.00
10/09/24	JRA	CORRESPOND WITH S. NEWMAN, M. FITZPATRICK AND M. SOLIMANI RE TODAY'S HEARING	0.40	370.00
10/09/24	MEF	ATTEND CONFIRMATION HEARING (1.0, 2.0)	3.00	1,725.00
10/09/24	MEF	PREP FOR CONFIRMATION HEARING (BINDER PREP, PRINTING PLEADINGS PER M. RUSSELL REQUEST, COORDINATING ZOOM APPEARANCES) & EMAILS W/ B. BUTTERFIELD AND M. RUSSELL RE SAME	2.90	1,667.50
10/09/24	LSM	COMPILE, REVIEW AND CIRCULATE TO CS TEAM AND CO-COUNSEL THE AMENDED AGENDA FOR OCTOBER 9, 2024 HEARING	0.30	120.00
10/09/24	LSM	COMPILE, REVIEW AND CIRCULATE TO CS TEAM THE SUPPLEMENTAL AGENDA FOR OCTOBER 11, 2024 HEARING	0.30	120.00
10/09/24	LSM	UPDATE HEARING BINDERS FOR OCTOBER 9, 2024 HEARING AND FORWARD TO CS TEAM AND CO-COUNSEL	1.30	520.00
10/09/24	MEF	REVIEW AMENDED AGENDA FOR CONFIRMATION HEARING	0.10	57.50



**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/10/24	MMH	VIRTUALLY ATTEND AND RUN LISTEN ONLY LINE FOR HEARING	0.30	129.00
10/10/24	MMH	CORRESPONDENCE WITH D. MANNAL RE: HEARING LINK	0.10	43.00
10/10/24	LSM	ASSIST WITH HEARING PREPARATIONS FOR OCTOBER 10, 2024 AND OCTOBER 11, 2024 HEARING	1.80	720.00
10/10/24	PJR	EMAILS TO AND FROM D. MANNAL AND S. NEWMAN RE: HEARING ISSUES	0.10	90.00
10/11/24	MMH	VIRTUALLY ATTEND AND RUN BRIDGE LINE FOR CONTINUED HEARING	1.20	516.00
10/11/24	MMH	VIRTUALLY ATTEND AND RUN BRIDGE LINE FOR HEARING	0.60	258.00
10/11/24	PJR	ATTEND CONFIRMATION HEARING	0.90	810.00

**REORGANIZATION PLAN**

**20.40 16,106.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/03/24	JRA	REVIEW SECOND PLAN SUPPLEMENT	0.70	647.50
10/04/24	SLN	REVIEW SEC CONFIRMATION OBJECTION (.5); REVIEW UST CONFIRMATION OBJECTION (1.7);	2.20	1,760.00
10/04/24	PJR	REVIEW UST OBJECTION TO CONFIRMATION	0.20	180.00
10/06/24	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING REVISED CONFIRMATION ORDER AND OPT OUT, INCLUDING REVIEW OF DS ORDER (.3);	0.30	240.00
10/06/24	MEF	EMAILS W/ M. RUSSEL AND S. NEWMAN RE: CONFIRMATION ORDER INQUIRY & REVISE DISCLOSURE STATEMENT ORDER RE SAME	0.60	345.00
10/06/24	MEF	REVIEW UST PLAN OBJECTION	0.60	345.00
10/07/24	SLN	CORRESPONDENCE WITH UCC COUNSEL REGARDING REVISED CONFIRMATION ORDER (.1); REVIEW UST CONFIRMATION OBJECTION (.3); REVIEW AMERICAN LEASE CONFIRMATION OBJECTION AND ADJOURNMENT REQUEST (.2); REVIEW AMERICAN LEASE MOTION FOR LEAVE TO FILE LATE OBJECTION (.1);	0.70	560.00
10/07/24	JRA	REVIEW NHTSA OBJECTION TO CONFIRMATION	0.20	185.00
10/07/24	JRA	REVIEW SEC OBJECTION TO CONFIRMATION	0.30	277.50
10/08/24	SLN	CORRESPONDENCE WITH UCC REGARDING PLAN OBJECTIONS (.1); REVIEW DEBTORS CONFIRMATION BRIEF (2.2); REVIEW DIDONATO DECLARATION IN SUPPORT OF CONFIRMATION (.5); REVIEW VOTING DECLARATION (.2); REVIEW AMENDED PLAN (.4); REVIEW DEBTORS RESPONSE TO AMERICAN LEASE CONFIRMATION OBJECTION (.2);	3.60	2,880.00
10/08/24	MEF	REVIEW DEBTORS PROPOSED CONFIRMATION ORDER	0.70	402.50
10/08/24	MEF	EMAILS W/ M. RUSSELL AND K. WINIARSKI RE: CONFIRMATION ORDER OPT OUT MECHANICS AND REVIEW SOLICITATION ORDER RE SAME	0.40	230.00
10/08/24	MEF	REVIEW AMERICAN LEASE EMERGENCY CONFIRMATION OBJECTION	0.10	57.50

**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/08/24	MEF	REVIEW NHTSA PLAN CONFIRMAITON OBJECTION	0.10	57.50
10/09/24	JRA	REVIEW VOTING TABULATION	0.30	277.50
10/09/24	PJR	REVIEW AND ANALYZE CONFIRMATION ORDER (.5); REVIEW AND ANALYZE PLAN (.6)	1.10	990.00
10/09/24	JRA	REVIEW DEBTORS RESPONSE TO TOCCATA'S MOTION FOR SECURED CLAIM	0.30	277.50
10/09/24	JRA	REVIEW CONFIRMATION BRIEF	1.10	1,017.50
10/09/24	JRA	REVIEW RESPONSE TO AMERICAN LEASING OBJECTION	0.20	185.00
10/09/24	MEF	REVIEW DIDONATO DEC IN SUPPORT OF PLAN CONFIRMATION	0.20	115.00
10/09/24	MEF	REVIEW REDLINE OF AMENDED PLAN AND DISCLOSURE STATEMENT	0.60	345.00
10/09/24	MEF	REVIEW DEBTORS RESPONSE TO AMERICAN LEASING PLAN OBJECTION	0.30	172.50
10/09/24	MEF	REVIEW DEBTORS CONFIRMATION BRIEF	1.10	632.50
10/10/24	SLN	REVIEW VOTING REPORT (.1); REVIEW REVISED PROPOSED PLAN (.2);	0.30	240.00
10/10/24	JRA	CORRESPOND WITH D. MANNAL, S. NEWMAN, H. YAN, M. HARTLIPP AND UCC MEMBERS RE CONFIRMATION HEARING AND OPEN ISSUES	0.80	740.00
10/11/24	SLN	REVIEW REDLINE CONFIRMATION ORDER (.2); REVIEW TERM SHEET FOR AMERICAN LEASING DEAL (.2);	0.40	320.00
10/11/24	JRA	FURTHER CORRESPONDENCE WITH D. MANNAL, S. NEWMAN AND UCC MEMBERS RE CONFIRMATION ISSUES AND HEARING STATUS	0.50	462.50
10/11/24	JRA	REVIEW REVISED PLAN (.5); EMAIL WITH D. MANNAL RE SAME (.1)	0.60	555.00
10/11/24	JRA	T/C WITH B. BUTTERFIELD RE CONFIRMATION ISSUES	0.30	277.50
10/13/24	JRA	EMAILS WITH E. GREENHAUS RE CONFIRMATION ISSUE	0.20	185.00
10/15/24	SLN	CORRESPONDENCE WITH UCC PROFESSIONALS REGARDING EFFECTIVE DATE (.2); REVIEW BLACKLINE PLAN (.1); REVIEW REVISED CONFIRMATION ORDER (.1);	0.40	320.00
10/15/24	MMH	CORRESPONDENCE WITH M3 RE: CLOSING ESCROW	0.10	43.00
10/16/24	MMH	CALENDAR APPLICABLE UPCOMING PLAN DEADLINES	0.10	43.00
10/16/24	JRA	REVIEW REVISED PLAN (.6); CORRESPOND WITH B. BUTTERFIELD AND D. MANNAL RE SAME (.2)	0.80	740.00
TOTAL HOURS			59.20	
PROFESSIONAL SERVICES:				\$39,591.50

**COLE SCHOTZ P.C.**Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001Invoice Number 991565  
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Page 7**TIMEKEEPER SUMMARY**

<b><u>NAME</u></b>	<b><u>TIMEKEEPER TITLE</u></b>	<b><u>HOURS</u></b>	<b><u>RATE</u></b>	<b><u>AMOUNT</u></b>
Julie A. Aberasturi	Associate	0.40	430.00	172.00
Justin R. Alberto	Member	8.20	925.00	7,585.00
Larry S. Morton	Paralegal	7.40	400.00	2,960.00
Melissa M. Hartlipp	Associate	6.60	430.00	2,838.00
Michael A. Solimani	Associate	1.30	405.00	526.50
Michael E. Fitzpatrick	Associate	13.20	575.00	7,590.00
Patrick J. Reilley	Member	2.40	900.00	2,160.00
Stacy L. Newman	Member	19.70	800.00	15,760.00
		<b>Total</b>	<b>59.20</b>	<b>\$39,591.50</b>

**FISKER INC., ET AL.****SUMMARY OF BILLING BY PROFESSIONAL  
FOR THE FINAL PERIOD FROM  
JULY 4, 2024 THROUGH OCTOBER 17, 2024**

<b>Name of Professional Person</b>	<b>Year Admitted</b>	<b>Position with the Applicant</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Justin R. Alberto	2008	Member (Bankruptcy)	\$830.00	122.0	\$101,260.00
			\$925.00	24.7	\$22,847.50
Patrick J. Reilley	2003	Member (Bankruptcy)	\$805.00	39.2	\$31,556.00
			\$900.00	6.8	\$6,120.00
Christopher Gagic	1997	Member (Tax, Trusts & Estates)	\$650.00	5.9	\$3,835.00
Stacy L. Newman	2007	Member (Bankruptcy)	\$725.00	107.6	\$78,010.00
			\$800.00	38.5	\$30,800.00
Jamie P. Clare	1994	Member (Litigation, Construction & Employment)	\$780.00	7.6	\$5,928.00
Mark Tsukerman	2010	Member (Bankruptcy)	\$700.00	5.7	\$3,990.00
Jonathan R. Friedman	2019	Associate (Bankruptcy)	\$550.00	7.7	\$4,235.00
Jack M. Dougherty	2021	Associate (Bankruptcy)	\$500.00	32.9	\$16,450.00
Michael E. Fitzpatrick	2022	Associate (Bankruptcy)	\$500.00	146.8	\$73,400.00
			\$575.00	16.9	\$9,717.50
Raquel S. Zeitlin	2020	Associate (Tax)	\$420.00	8.0	\$3,360.00
Melissa M. Hartlipp	2022	Associate (Bankruptcy)	\$385.00	90.5	\$34,842.50
			\$430.00	20.7	\$8,901.00
Julie A. Aberasturi	2022	Associate (Bankruptcy)	\$430.00	0.4	\$172.00
Matthew M. Love	2022	Associate (Real Estate)	\$400.00	8.1	\$3,240.00
Michael A. Solimani	N/A	Law Clerk	\$405.00	1.3	\$526.50

<b>Name of Professional Person</b>	<b>Year Admitted</b>	<b>Position with the Applicant</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Larry S. Morton	N/A	Paralegal (Bankruptcy)	\$380.00	49.9	\$18,962.00
			\$400.00	15.2	\$5,920.00
Pauline Z. Ratkowiak	N/A	Paralegal (Bankruptcy)	\$385.00	2.8	\$1,078.00
			\$405.00	5.8	\$2,349.00
<b>TOTAL</b>				<b>765.0</b>	<b>\$467,500.00</b>

**Total Requested Compensation: \$492,500.00<sup>1</sup>**

**Total Attorney Compensation: \$439,191.00**

**Blended Rate All Attorneys: \$635.31**

**Blended Rate All Timekeepers: \$611.11**

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<sup>1</sup> This amount includes an estimated \$25,000 in additional fees and expenses incurred after October 17, 2024 in connection with (i) preparing this Application; (ii) responding to objections to this Application, if any; and (iii) attending the hearing thereon. Cole Schotz reserves the right to seek additional amounts for fees and expenses incurred after October 17, 2024 if not accounted for herein, and in preparing this Application and reviewing the final fee applications of other professionals.

**FISKER INC., ET AL.**

**SUMMARY OF COMPENSATION BY PROJECT CATEGORY  
FOR THE FINAL PERIOD FROM  
JULY 4, 2024 THROUGH OCTOBER 17, 2024**

<b>PROJECT CATEGORY</b>	<b>TOTAL HOURS</b>	<b>TOTAL FEES</b>
Asset Dispositions, Sales, Uses and Leases	19.5	\$14,348.00
Automatic Stay Matters/Litigation	4.3	\$3,186.50
Case Administration	126.8	\$80,638.00
Cash Collateral and DIP Financing	25.9	\$18,241.00
Claims Analysis	2.0	\$1,424.50
Committee Matters and Creditor Meetings	66.1	\$47,277.50
Creditor Inquiries	1.2	\$950.50
Disclosure Statement/Voting Issues	1.9	\$1,607.00
Executory Contracts	1.6	\$1,284.00
Fee Application Matters/Objections	31.9	\$16,862.50
Leases (Real Property)	2.1	\$1,447.50
Litigation	262.1	\$154,885.50
Preparation for and Attendance at Hearings	120.9	\$63,514.50
Reorganization Plan	34.4	\$27,533.50
Retention Matters	64.1	\$34,121.50
U.S. Trustee Matters and Meetings	0.2	\$133.00
<b>TOTAL</b>	<b>765.0</b>	<b>\$467,455.00</b>

**EXHIBIT B****FIKER INC., *ET AL.*****EXPENSE SUMMARY  
FOR THE MONTHLY PERIOD FROM  
OCTOBER 1, 2024 THROUGH OCTOBER 17, 2024**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Court Fees	PACER	\$66.30
Courier Service	Reliable/Parcels	\$1,450.70
Postage		\$9.92
Breakfast/Lunch/Dinner Conferences for Hearings		\$356.50
<b>TOTAL</b>		<b>\$1,883.42</b>

**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

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**COST DETAIL**

<b><u>DATE</u></b>	<b><u>Description</u></b>	<b><u>QUANTITY</u></b>	<b><u>AMOUNT</u></b>
07/08/24	COURT FEES	7.00	0.70
07/08/24	COURT FEES	1.00	0.10
07/08/24	COURT FEES	2.00	0.20
07/08/24	COURT FEES	1.00	0.10
07/08/24	COURT FEES	30.00	3.00
07/08/24	COURT FEES	2.00	0.20
07/08/24	COURT FEES	1.00	0.10
07/08/24	COURT FEES	23.00	2.30
07/08/24	COURT FEES	1.00	0.10
07/08/24	COURT FEES	1.00	0.10
07/08/24	COURT FEES	5.00	0.50
07/08/24	COURT FEES	2.00	0.20
07/08/24	COURT FEES	2.00	0.20
07/08/24	COURT FEES	2.00	0.20
07/08/24	COURT FEES	17.00	1.70
07/08/24	COURT FEES	7.00	0.70
07/08/24	COURT FEES	6.00	0.60
07/08/24	COURT FEES	30.00	3.00
07/09/24	COURT FEES	27.00	2.70
07/09/24	COURT FEES	30.00	3.00
07/10/24	COURT FEES	20.00	2.00
07/12/24	COURT FEES	30.00	3.00
07/12/24	COURT FEES	3.00	0.30
07/12/24	COURT FEES	30.00	3.00
07/16/24	COURT FEES	1.00	0.10
07/16/24	COURT FEES	10.00	1.00
07/18/24	COURT FEES	12.00	1.20
07/18/24	COURT FEES	3.00	0.30
07/18/24	COURT FEES	11.00	1.10
07/18/24	COURT FEES	2.00	0.20
07/18/24	COURT FEES	18.00	1.80
07/18/24	COURT FEES	12.00	1.20
07/18/24	COURT FEES	14.00	1.40
07/18/24	COURT FEES	3.00	0.30
07/20/24	COURT FEES	2.00	0.20
07/20/24	COURT FEES	16.00	1.60
08/13/24	COURT FEES	15.00	1.50



**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

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<u>DATE</u>	<u>Description</u>	<u>QUANTITY</u>	<u>AMOUNT</u>
09/09/24	COURT FEES	10.00	1.00
09/09/24	COURT FEES	30.00	3.00
09/09/24	COURT FEES	30.00	3.00
09/16/24	COURT FEES	30.00	3.00
09/16/24	COURT FEES	2.00	0.20
09/24/24	COURT FEES	4.00	0.40
09/24/24	COURT FEES	30.00	3.00
09/24/24	COURT FEES	3.00	0.30
09/24/24	COURT FEES	26.00	2.60
09/24/24	COURT FEES	3.00	0.30
09/24/24	COURT FEES	4.00	0.40
09/24/24	COURT FEES	2.00	0.20
09/24/24	COURT FEES	3.00	0.30
09/24/24	COURT FEES	11.00	1.10
09/24/24	COURT FEES	3.00	0.30
09/24/24	COURT FEES	3.00	0.30
09/24/24	COURT FEES	11.00	1.10
09/24/24	COURT FEES	30.00	3.00
09/25/24	COURT FEES	8.00	0.80
09/25/24	COURT FEES	3.00	0.30
09/25/24	COURT FEES	10.00	1.00
09/25/24	COURT FEES	3.00	0.30
09/27/24	COURT FEES	2.00	0.20
09/27/24	COURT FEES	3.00	0.30
10/09/24	DELIVERY/COURIERS	1.00	91.00
10/09/24	DELIVERY/COURIERS	1.00	46.00
10/09/24	DELIVERY/COURIERS	1.00	90.00
10/09/24	LUNCHEON/DINNER CONFERENCE - 5 PROFESSIONALS DURING HEARING DAYS	1.00	110.50
10/10/24	POSTAGE	1.00	9.92
10/10/24	DELIVERY/COURIERS	1.00	1,223.70
10/10/24	LUNCHEON/DINNER CONFERENCE - 5 PROFESSIONALS DURING HEARING DAYS	1.00	246.00
<b>Total</b>			<b>\$1,883.42</b>

**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 68099-0001

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TOTAL SERVICES AND COSTS: \$ 41,474.92

**FISKER INC., ET AL.**

**EXPENSE SUMMARY  
FOR THE FINAL PERIOD FROM  
JULY 4, 2024 THROUGH OCTOBER 17, 2024**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Photocopying/Printing/Scanning (2,724 pages @ \$0.10/page)		\$272.40
Court Fees	PACER	\$195.70
Online Research	Westlaw/Lexis	\$599.97
Filing Fees		\$500.00
Outside Printing	Reliable/Parcels	\$9,499.41
Courier Service	Reliable/Parcels	\$1,705.70
Postage		\$168.00
Breakfast/Lunch/Dinner Conferences for Hearings		\$1,086.33
Transcripts		\$82.35
<b>TOTAL</b>		<b>\$14,109.86</b>

**Exhibit C**

**Customary and Comparable Compensation Disclosures,  
Budget and Staffing Plan and Summary Cover Sheet of Final Fee Application**

**CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES**

The aggregate hourly rate for all Cole Schotz Delaware, New Jersey and New York non-bankruptcy timekeepers (including both attorneys and paralegals) (the “Non-Bankruptcy Blended Rate”) for the year ending December 31, 2023 (the “Comparable Period”) was \$545.85 per hour, and the aggregate hourly rate for all Cole Schotz Delaware, New Jersey and New York bankruptcy timekeepers (including both attorneys and paralegals) (the “Bankruptcy Blended Rate”) for the Comparable Period was \$637.37 per hour.

The blended hourly rate for all Cole Schotz timekeepers (including both attorneys and paralegals) who provided services to the Committee during the Final Period was approximately \$611.11 per hour.

<b>Category of Timekeeper</b>	<b>2023 Bankruptcy Blended Rate</b>	<b>2023 Non-Bankruptcy Blended Rate</b>	<b>Final Period Blended Rate</b>
Member	\$765.64	\$665.22	\$794.26
Special Counsel	N/A	\$673.65	N/A
Associate	\$475.36	\$421.60	\$415.26
Paralegal	\$356.74	\$335.20	\$384.11
<b>Aggregate</b>	<b>\$637.37</b>	<b>\$545.85</b>	<b>\$611.11</b>

**FISKER INC., ET AL.**

**STAFFING PLAN FOR COLE SCHOTZ P.C.  
JULY 4, 2024 – OCTOBER 17, 2024**

*ALL FIGURES ARE ESTIMATES*

<b>Category of Timekeeper</b>	<b>Estimated Number of Timekeepers Expected to Work on Matters During the Budget Period</b>	<b>Average Hourly Rate</b>
Members	3	\$895
Associates	3	\$550
Paralegal	2	\$415
<b>Estimated Blended Hourly Rate:</b>		<b>\$650</b>

**FISKER INC., ET AL.****BUDGET AND BILLING BY PROJECT CATEGORY  
JULY 4, 2024 THROUGH OCTOBER 17, 2024**

<b>PROJECT CATEGORY</b>	<b>ESTIMATED HOURS</b>	<b>ESTIMATED FEES</b>	<b>TOTAL HOURS</b>	<b>TOTAL FEES</b>
Asset Dispositions, Sales, Uses, and Leases	20.0	\$13,000.00	19.5	\$14,348.00
Automatic Stay Issues	5.0	\$3,250.00	4.3	\$3,186.50
Case Administration	150.0	\$97,500.00	126.8	\$80,683.00
Cash Collateral and DIP Financing	50.0	\$16,835.00	25.9	\$18,241.00
Claims Analysis	5.0	\$3,250.00	2.0	\$1,424.50
Committee Matters and Creditor Meetings	100.0	\$65,000.00	66.1	\$47,277.50
Creditor Inquiries	5.0	\$3,250.00	1.2	\$950.50
Disclosure Statement/Voting Issues	5.0	\$3,250.00	1.9	\$1,607.00
Executory Contracts	5.0	\$3,250.00	1.6	\$1,284.00
Fee Application Matters/Objections	50.0	\$32,500.00	31.9	\$16,862.50
Leases (Real Property)	5.0	\$3,250.00	2.1	\$1,447.50
Litigation	250.0	\$170,365.00	262.1	\$154,885.50
Preparation for and Attendance at Hearings	125.0	\$81,250.00	120.9	\$63,514.50
Reorganization Plan	50.0	\$32,500.00	34.4	\$27,533.50
Retention Matters	75.0	\$48,750.00	64.1	\$34,121.50
U.S. Trustee Matters and Meetings	5.0	\$3,250.00	0.2	\$ 133.00
<b>TOTAL</b>	<b>905.0</b>	<b>\$580,450.00</b>	<b>765.0</b>	<b>\$467,500.00</b>

<b>SUMMARY OF FINAL FEE APPLICATION</b>	
Name of Applicant	Cole Schotz P.C.
Name of Client	Official Committee of Unsecured Creditors of Fisker Inc., <i>et al.</i>
Fee period covered by Final Fee Application	July 4, 2024 through October 17, 2024
Total compensation sought during Final Period	\$492,500.00 <sup>1</sup>
Total expenses sought during Final Period	\$14,109.86
Petition Date	June 17 and 19, 2024
Retention Date	August 6, 2024, effective as of July 4, 2024
Date of order approving employment	August 6, 2024
Total compensation approved by interim order to date	\$0.00
Total expenses approved by interim order to date	\$0.00
Total allowed compensation paid to date	\$304,117.20
Total allowed expenses paid to date	\$12,150.01
Blended rate in Final Fee Application for all Attorneys	\$635.31
Blended rate in Final Fee Application for all Timekeepers	\$611.11
Compensation sought in this Final Fee Application already paid pursuant to a monthly compensation order but not yet allowed	\$304,117.20
Expenses sought in this Final Fee Application already paid pursuant to a monthly compensation order but not yet allowed	\$12,150.01
Number of professionals included in this Final Fee Application	16
If applicable, number of professionals in this Final Fee Application not included in staffing plan	N/A
If applicable, difference between fees budgeted and compensation sought for this Final Period	Budgeted: \$580,450.00 Difference: (\$87,950.00)
Number of professionals billing fewer than 15 hours to the case during this Final Period:	9
Are any rates higher than those approved or disclosed at retention? If yes, calculate and disclose the total compensation sought in this Final Fee Application using the rates originally disclosed in the retention application:	8

<sup>1</sup> This amount includes an estimated \$25,000 in additional fees and expenses incurred after October 17, 2024 in connection with (i) preparing this Application; (ii) responding to objections to this Application, if any; and (iii) attending the hearing thereon. Cole Schotz reserves the right to seek additional fees or expenses incurred for fees incurred during the time period indicated above if not accounted for herein, and in preparing this Application and reviewing the final fee applications of other professionals.



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

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In re:	)	
	)	Chapter 11
	)	
FISKER INC., <i>et al.</i> ,	)	Case No. 24-11390 (TMH)
	)	
Debtors. <sup>1</sup>	)	(Jointly Administered)
	)	
	)	<b>Hearing Date: December 9, 2024, at 11:00 a.m. (ET)</b>
	)	<b>Objection Deadline: December 2, 2024, at 4:00 p.m. (ET)</b>

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**NOTICE OF COMBINED FOURTH MONTHLY AND FINAL FEE  
APPLICATION OF COLE SCHOTZ P.C., DELAWARE CO-COUNSEL  
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE MONTHLY PERIOD FROM OCTOBER 1, 2024 THROUGH OCTOBER 17,  
2024 AND THE FINAL PERIOD FROM JULY 4, 2024 THROUGH OCTOBER 17, 2024**

**PLEASE TAKE NOTICE** that on November 11, 2024, Cole Schotz P.C. filed the *Combined Fourth Monthly and Final Fee Application of Cole Schotz P.C., Delaware Co-Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Monthly Period from October 1, 2024 through October 17, 2024 and the Final Period from July 4, 2024 through October 17, 2024* (the “Application”), which seeks: (i) approval of monthly compensation for professional services rendered to the Official Committee of Unsecured Creditors (the “Committee”) in the amount of \$31,673.20 (80% of \$39,591.50), together with reimbursement of expenses in the amount of \$1,883.42 for the monthly period from October 1, 2024 through October 17, 2024 (the “Monthly Period”) and (ii) approval of final compensation for professional services rendered to the Committee in the amount of \$492,500.00, together with reimbursement of final expenses in the amount of \$14,109.86 for the final period from July 4, 2024 through October 17, 2024 (the “Final Period”).

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Application are required to be filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served on the following, so as to be **received no later than 4:00 p.m. (ET) on December 2, 2024 (the “Objection Deadline”)**: (i) the Debtors, c/o Fisker Inc., 14 Centerpointe Drive, La Palma, CA 90623 (Attn: John C. DiDonato, jdidonato@hcg.com); (ii) counsel to the Debtors, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, NY, 10017 (Attn: Brian M. Resnick, Esq., brian.resnick@davispolk.com; Darren S. Klein, Esq., darren.klein@davispolk.com; Steven Z.

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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.

Szanzer, Esq., steven.szanzer@davispolk.com; and Richard J. Steinberg, Esq., richard.steinberg@davispolk.com) and Morris Nichols Arshat & Tunnell LLP, 1201 North Market Street, 16th Floor, Wilmington, DE 19801 (Attn: Robert J. Dehney, Sr., Esq., rdehney@morrisonnichols.com; Andrew R. Remming, Esq., aremring@morrisonnichols.com; Brenna A. Dolphin, Esq., bdolphin@morrisonnichols.com; and Sophie Rogers Churchill, Esq., srchurchill@morrisonnichols.com); (iii) counsel to the Official Committee of Unsecured Creditors, Morrison & Foerster LLP, 250 West 55th Street, New York, NY 10019-9601 (Attn: Lorenzo Marinuzzi, Esq., lmarinuzzi@mfo.com; Douglas Mannal, Esq., dmannel@mfo.com; Benjamin Butterfield, Esq., bbutterfield@mfo.com; and Miranda K. Russell, Esq., mrussell@mfo.com) and Cole Schotz, P.C., 500 Delaware Avenue, Suite 1410, Wilmington, DE 19801 (Attn: Justin R. Alberto, Esq., jalberto@coleschotz.com); and (iv) the U.S. Trustee, Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801 (Attn: Linda Richenderfer, Esq., linda.richenderfer@usdoj.gov and Malcom M. Bates, Esq., malcolm.m.bates@usdoj.gov).

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Application will be held on **December 9, 2024 at 11:00 a.m. (ET) (the “Hearing”)** before The Honorable Thomas H. Horan, United States Bankruptcy Judge of the United States Bankruptcy Court for the District of Delaware, 3rd Floor, Courtroom No. 7, 824 North Market Street, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE BY THE OBJECTION DEADLINE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED BY THE APPLICATION WITHOUT FURTHER NOTICE.**

*[Remainder of Page Intentionally Left Blank]*

Dated: November 11, 2024

*/s/ Justin R. Alberto*

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**COLE SCHOTZ P.C.**

Justin R. Alberto (No. 5126)  
Patrick J. Reilley (No. 4451)  
Stacy L. Newman (No. 5044)  
Michael E. Fitzpatrick (No. 6797)  
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preilley@coleschotz.com  
snewman@coleschotz.com  
mfitzpatrick@coleschotz.com

-and-

**MORRISON & FOERSTER LLP**

Lorenzo Marinuzzi (admitted *pro hac vice*)  
Doug Mannal (admitted *pro hac vice*)  
Benjamin Butterfield (admitted *pro hac vice*)  
Miranda K. Russell (admitted *pro hac vice*)  
Darren Smolarski (admitted *pro hac vice*)  
Donghao (Helen) Yan (admitted *pro hac vice*)  
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*Co-Counsel to the Official Committee  
of Unsecured Creditors*