

**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)

**Re: Docket No. 793**

**CERTIFICATE OF NO OBJECTION REGARDING MOTION OF THE LIQUIDATING  
TRUSTEE FOR ENTRY OF AN ORDER EXTENDING THE PERIOD TO  
FILE AND SERVE OBJECTIONS TO ADMINISTRATIVE  
CLAIMS THROUGH AND INCLUDING APRIL 18, 2025**

The undersigned counsel to Matthew Dundon, solely in his capacity as the Liquidating Trustee (the “Liquidating Trustee”) of the Fisker Liquidating Trust (the “Liquidating Trust”), hereby certifies that, as of the date hereof, no answer, objection, or other responsive pleading has been filed or received to the *Motion of the Liquidating Trustee for Entry of an Order Extending the Period to File and Serve Objections to Administrative Claims Through and Including April 18, 2025* [Docket No. 793] (the “Motion”) filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) on November 13, 2024. Pursuant to the Notice of Motion, objections to the Motion were to be filed and served no later than November 27, 2024 at 4:00 p.m. (ET) (the “Objection Deadline”).

The Objection Deadline has passed, and no objections or other responsive pleading to the Motion appear on the docket or were served upon the undersigned counsel. It is therefore

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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.



respectfully requested that the Court enter the Proposed Order attached hereto as **Exhibit A** at the earliest convenience of the Court.

Dated: December 3, 2024  
Wilmington, Delaware

**COLE SCHOTZ P.C.**

*/s/ Justin R. Alberto*

**COLE SCHOTZ P.C.**

Justin R. Alberto (No. 5126)  
Patrick J. Reilley (No. 4451)  
Stacy L. Newman (No. 5044)  
Michael E. Fitzpatrick (No. 6797)  
500 Delaware Avenue, Suite 1410  
Wilmington, DE 19801  
Telephone: (302) 652-3131  
Facsimile: (302) 652-3117  
Email: jalberto@coleschotz.com  
preilley@coleschotz.com  
snewman@coleschotz.com  
mfitzpatrick@coleschotz.com

-and-

**ASK LLP**

Brigette G. McGrath (admitted *pro hac vice*)  
Jason C. DiBattista (admitted *pro hac vice*)  
2600 Eagan Woods Drive, Suite 400  
St. Paul, Minnesota 55121  
Telephone: (651) 406-9665  
Facsimile: (651) 406-9676  
Email: jdibattista@askllp.com  
bmcgrath@askllp.com

-and-

Marianna Udem (admitted *pro hac vice*)  
60 East 42nd Street, 46th Floor  
New York, New York 10165  
Telephone: (212) 267-7342  
Facsimile: (212) 918-3427  
Email: mudem@askllp.com

*Co-Counsel to the Liquidating Trustee*

**Exhibit A**

**Proposed Order**

**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)

**Re: D.I. 793**

**ORDER EXTENDING THE PERIOD TO FILE AND SERVE OBJECTIONS TO  
ADMINISTRATIVE CLAIMS THROUGH AND INCLUDING APRIL 18, 2025**

This matter having come before the Court on the *Motion of the Liquidating Trustee for Entry of an Order Extending the Period to File and Serve Objections to Administrative Claims Through and Including April 18, 2025* (the “**Motion**”),<sup>2</sup> filed by Matthew Dundon, solely in his capacity as the Liquidating Trustee (the “**Liquidating Trustee**”) of the Fisker Liquidating Trust (the “**Liquidating Trust**”), pursuant to sections 105(a) of title 11 of the United States Code, Rule 9006(b) of the Federal Rules of Bankruptcy Procedure, and Rule 9006-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, as more fully described in the Motion; and the Court having reviewed the Motion; and the Court finding that: (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated February 29, 2012; (ii) venue is appropriate pursuant to 28 U.S.C.

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<sup>1</sup> The debtors 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 utilized but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

§§ 1408 and 1409; (iii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and a final order may be entered on this matter under Article III of the U.S. Constitution; (iv) notice of the Motion was sufficient under the circumstances and no other or further notice is necessary; and (v) a sound business purpose exists for the relief granted herein; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor; it is hereby ordered that

1. The Motion is GRANTED to the extent provided herein.
2. The Administrative Claims Objection Deadline is extended through and including April 18, 2025.
3. The relief granted herein is without prejudice to the Liquidating Trustee's or any successor-in-interest's right to seek further extensions of the Administrative Claims Objection Deadline.
4. The Liquidating Trustee and his authorized representatives are authorized and empowered to take any and all actions necessary to implement the terms of this Order.
5. The terms and conditions of this Order shall be immediately enforceable and effective upon its entry.
6. This Court retains jurisdiction over all matters arising from or related to the interpretation, implementation and enforcement of this Order.