

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

In re:

FIKER INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

Re: 781

**NOTICE OF FILING OF SUPPLEMENT TO THE COMBINED FOURTH MONTHLY AND FINAL FEE APPLICATION OF MORRISON & FOERSTER LLP, AS 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 3, 2024 THROUGH OCTOBER 17, 2024**

**PLEASE TAKE NOTICE** that on November 11, 2024, Morrison & Foerster LLP (“Morrison & Foerster”) filed the *Combined Fourth Monthly and Final Fee Application of Morrison & Foerster LLP as 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 3, 2024 Through October 17, 2024* [Docket No. 781] (the “Final Fee Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that, in the Final Fee Application, Morrison & Foerster requested final approval of \$3,082,379.25<sup>2</sup> in fees and \$45,175.79 in expenses incurred for the period commencing July 3, 2024 through October 17, 2024 (the “Final Period”). Morrison

<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 amount included an estimated \$100,000.00 in fees and expenses for the Supplemental Period (as defined herein).



& Foerster also reserved the right to supplement its Final Fee Application to include fees and expenses incurred after October 17, 2024 (the “Supplemental Period”), including in connection with preparing the Final Fee Application and responding to informal comments.

**PLEASE TAKE FURTHER NOTICE** that, Morrison & Foerster hereby files the supplement (the “Supplement”) to the Final Fee Application, which is attached hereto as **Exhibit A**. As set forth in the Supplement, Morrison & Foerster has incurred \$29,383.50 in fees and \$0.00 in actual and necessary expenses during the Supplemental Period.

**PLEASE TAKE FURTHER NOTICE** that, Morrison & Foerster believes that the time entries and expenses included in **Exhibit A** comply with the requirements of Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware.

*[Remainder of this page intentionally left blank.]*

Dated: December 11, 2024

/s/ Stacy L. Newman

**COLE SCHOTZ P.C.**

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-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*

**EXHIBIT A**

**MORRISON FOERSTER**

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MORRISON & FOERSTER LLP

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

**Taxpayer ID #:** [REDACTED]  
Invoice Number: 6378475  
Invoice Date: December 06, 2024

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

Matter Name: BANKRUPTCY

*For Professional Services Rendered and Disbursements Incurred through November 30, 2024*

|  | <u>US Dollar</u>               |
|--|--------------------------------|
| Current Fees                             | 39,960.50                      |
| Client Accommodation - Time Entry Review | (10,577.00)                    |
| Net Fees                                 | <u>29,383.50</u>               |
| <b>INVOICE TOTAL</b>                     | <b><u><u>29,383.50</u></u></b> |

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**HORRISON FOERSTER**034024-0000001  
BANKRUPTCYInvoice Number: 6378475  
Invoice Date: December 06, 2024**Time Detail**

| <b>Date</b>                                | <b>Services</b>   | <b>Timekeeper</b>     | <b>Hours</b> | <b>Value</b>    |
|--|---|-----------------------|--------------|-----------------|
| <b>007 Case Administration</b>             |   |                       |              |                 |
| 18-Oct-24                                  | Circulate notice of ECF filings to internal working group (.1); update case calendar (.1).  | Coffey, Cameron Tower | 0.20         | 74.00           |
| 21-Oct-24                                  | Circulate notice of ECF filings to internal working group (.1); update case calendar (.1).  | Coffey, Cameron Tower | 0.20         | 74.00           |
| 22-Oct-24                                  | Circulate notice of ECF filings to internal working group.  | Coffey, Cameron Tower | 0.10         | 37.00           |
| 23-Oct-24                                  | Circulate notice of ECF filings to internal working group (.1); update case calendar (.1); update ECF filing distribution schedule post-closing (.1).                                     | Coffey, Cameron Tower | 0.30         | 111.00          |
| 29-Oct-24                                  | Circulate notice of ECF filings to internal working group (.1); update case calendar (.1).  | Coffey, Cameron Tower | 0.20         | 74.00           |
| 01-Nov-24                                  | Circulate notice of ECF filings and calendar updates to internal working group.   | Coffey, Cameron Tower | 0.20         | 74.00           |
| 04-Nov-24                                  | Correspond with M. Russell regarding ongoing work streams.  | Smolarski, Darren     | 0.10         | 99.50           |
| 05-Nov-24                                  | Circulate notice of ECF filings to internal working group.  | Coffey, Cameron Tower | 0.20         | 74.00           |
| 13-Nov-24                                  | Circulate notice of ECF filings to internal working group (.2); update case calendar (.1).  | Coffey, Cameron Tower | 0.30         | 111.00          |
| 15-Nov-24                                  | Circulate notice of ECF filings and calendar updates to internal working group (.2); update case calendar (.1)..  | Coffey, Cameron Tower | 0.30         | 111.00          |
| 19-Nov-24                                  | Circulate notice of ECF filings to internal working group.  | Coffey, Cameron Tower | 0.10         | 37.00           |
| 20-Nov-24                                  | Circulate notice of ECF filings and calendar updates to internal working group.   | Coffey, Cameron Tower | 0.20         | 74.00           |
| 22-Nov-24                                  | Update case calendar.   | Coffey, Cameron Tower | 0.20         | 74.00           |
| 27-Nov-24                                  | Circulate notice of ECF filings to internal working group.  | Coffey, Cameron Tower | 0.10         | 37.00           |
| <b>Total: 007 Case Administration</b>      |   |                       | <b>2.70</b>  | <b>1,061.50</b> |
| <b>011 Employment and Fee Applications</b> |   |                       |              |                 |
| 18-Oct-24                                  | Correspond with internal working group regarding final fee application.   | Russell, Miranda K.   | 0.30         | 351.00          |
| 18-Oct-24                                  | Correspond with M. Russell regarding final fee application (.1); conduct diligence regarding key dates and deadlines in connection with same (.2); draft MoFo final fee application (.4). | Smolarski, Darren     | 0.70         | 696.50          |
| 22-Oct-24                                  | Correspond with D. Smolarski regarding final fee application (.1); correspond with internal working group regarding invoice review in connection with same (.1).                          | Russell, Miranda K.   | 0.20         | 234.00          |
| 23-Oct-24                                  | Correspond with internal working group regarding September monthly fee statement preparation.   | Russell, Miranda K.   | 0.30         | 351.00          |
| 24-Oct-24                                  | Correspond with internal working group regarding finalizing September monthly fee statement.  | Murphy, Joseph        | 0.10         | 99.50           |

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| <b>Date</b> | <b>Services</b>  | <b>Timekeeper</b>   | <b>Hours</b> | <b>Value</b> |
|-------------|--|---------------------|--------------|--------------|
| 24-Oct-24   | Draft September monthly fee statement.   | Russell, Miranda K. | 1.30         | 1,521.00     |
| 25-Oct-24   | Correspond with M. Russell regarding September monthly fee statement.  | Mannal, Doug        | 0.10         | 187.50       |
| 25-Oct-24   | Revise September monthly fee statement in preparation of filing same (.4); correspond with internal working group regarding same (.3).   | Murphy, Joseph      | 0.70         | 696.50       |
| 25-Oct-24   | Draft (.3) and finalize (.2) September monthly fee statement; correspond with internal working group regarding same (.1); coordinate filing of same (.1); correspond with U.S. Trustee regarding same (.1).  | Russell, Miranda K. | 0.80         | 936.00       |
| 25-Oct-24   | Analyze (.3) and revise (.2) September MoFo fee application; correspond with M. Russell regarding same (.1).   | Smolarski, Darren   | 0.60         | 597.00       |
| 29-Oct-24   | Correspond with internal working group and DPW team regarding final fee applications.  | Russell, Miranda K. | 0.10         | 117.00       |
| 30-Oct-24   | Call with R. Steinberg (DPW) and S. Churchill (MNAT) regarding final fee applications (.2); follow-up call with M. Fitzpatrick (Cole Schotz) regarding same (.1); correspond with Committee professionals regarding same (.1); meet with D. Smolarski regarding same (.1); correspond with M3 team regarding September monthly fee statement (.1). | Russell, Miranda K. | 0.60         | 702.00       |
| 30-Oct-24   | Draft MoFo final fee application (.6); meet with M. Russell regarding final fee applications (.1).   | Smolarski, Darren   | 0.70         | 696.50       |
| 01-Nov-24   | Draft final fee application.   | Smolarski, Darren   | 1.10         | 1,094.50     |
| 04-Nov-24   | Analyze final fee application.   | Mannal, Doug        | 0.40         | 750.00       |
| 04-Nov-24   | Correspond with internal working group regarding final fee application.  | Murphy, Joseph      | 0.20         | 199.00       |
| 05-Nov-24   | Correspond with internal working group regarding preparation of final fee application.   | Russell, Miranda K. | 0.10         | 117.00       |
| 06-Nov-24   | Correspond with M3 team regarding final fee applications.  | Russell, Miranda K. | 0.10         | 117.00       |
| 07-Nov-24   | Revise final fee application (.6); correspond with Cole Schotz team and internal working group regarding same (.1); analyze draft Cole Schotz final fee application (.1).  | Russell, Miranda K. | 0.80         | 936.00       |
| 07-Nov-24   | Analyze Cole Schotz draft final fee application.   | Smolarski, Darren   | 0.90         | 895.50       |
| 08-Nov-24   | Draft (2.2) and revise (2.1) final fee application; correspond with internal working group and Cole Schotz team regarding same (.2).   | Russell, Miranda K. | 4.50         | 5,265.00     |
| 11-Nov-24   | Analyze (.4) and comment on (.3) final fee application.  | Mannal, Doug        | 0.70         | 1,312.50     |
| 11-Nov-24   | Revise final fee application (4.3); calls with M. Hartlipp (Cole Schotz) (.1) and D. Mannal (.1) regarding same; finalize same for filing (.2); correspond with internal working group regarding same (.1).  | Russell, Miranda K. | 4.80         | 5,616.00     |
| 11-Nov-24   | Draft MoFo final fee application (2.2); correspond with M. Russell and D. Mannal regarding same (.4); analyze certificate of no objection in connection with September monthly fee statement (.1); correspond with Cole Schotz team regarding same (.1).   | Smolarski, Darren   | 2.80         | 2,786.00     |

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| <b>Date</b>                                       | <b>Services</b>  | <b>Timekeeper</b>   | <b>Hours</b> | <b>Value</b>     |
|---|--|---------------------|--------------|------------------|
| 12-Nov-24   | Correspond with Cole Schotz team and internal working group regarding final fee applications.  | Russell, Miranda K. | 0.20         | 234.00           |
| 13-Nov-24   | Correspond with internal working group, Cole Schotz team and U.S. Trustee regarding final fee applications (.4); correspond with internal working group and Cole Schotz team regarding September monthly fee applications (.1).                        | Russell, Miranda K. | 0.50         | 585.00           |
| 13-Nov-24   | Correspond with internal working group regarding issues in connection with final fee application.  | Smolarski, Darren   | 0.20         | 199.00           |
| 14-Nov-24   | Correspond with internal working group regarding September monthly fee application.  | Russell, Miranda K. | 0.10         | 117.00           |
| 15-Nov-24   | Correspond with internal working group regarding September monthly fee application.  | Russell, Miranda K. | 0.10         | 117.00           |
| 19-Nov-24   | Correspond with Huron and internal working group regarding MoFo September fee statement.   | Smolarski, Darren   | 0.30         | 298.50           |
| 25-Nov-24   | Comment on draft certificate of no objection regarding MoFo fourth monthly fee statement.  | Smolarski, Darren   | 0.20         | 199.00           |
| 26-Nov-24   | Correspond with D. Mannal (.1) and Trust administrator (.1) regarding fee applications; correspond with Cole Schotz team regarding certificate of no objection (.1).   | Smolarski, Darren   | 0.30         | 298.50           |
| <b>Total: 011 Employment and Fee Applications</b> |  |                     | <b>24.80</b> | <b>28,322.00</b> |
| <b>032 Time Entry Review</b>                      |  |                     |              |                  |
| 21-Oct-24   | Correspond with M. Russell regarding analysis of September time entries and October time entries for compliance with U.S. Trustee's guidelines.  | Murphy, Joseph      | 0.20         | 199.00           |
| 21-Oct-24   | Analyze revisions regarding September time entries for compliance with U.S. Trustee's guidelines (.2); correspond with internal working group regarding same (.2).   | Russell, Miranda K. | 0.40         | 468.00           |
| 22-Oct-24   | Correspond with internal working group regarding analysis of September time entries and initial draft of October time entries for compliance with U.S. Trustee's guidelines.   | Murphy, Joseph      | 0.10         | 99.50            |
| 23-Oct-24   | Analyze preliminary draft of October time entries for compliance with U.S. Trustee's guidelines (.3); analyze D. Mannal comments regarding September time entries (.1) and correspond with internal working group regarding finalization of same (.5). | Murphy, Joseph      | 0.90         | 895.50           |
| 26-Oct-24   | Analyze October time entries for compliance with U.S. Trustee's guidelines (1.8); correspond with M. Russell regarding same (.1).  | Murphy, Joseph      | 1.90         | 1,890.50         |
| 28-Oct-24   | Analyze October time entries for compliance with U.S. Trustee's guidelines.  | Russell, Miranda K. | 0.80         | 936.00           |
| 29-Oct-24   | Analyze revised October time entries for compliance with U.S. Trustee's guidelines (.6); correspond with internal working group regarding same (.2).   | Murphy, Joseph      | 0.80         | 796.00           |
| 30-Oct-24   | Analyze further revised September time entries for compliance with U.S. Trustee's guidelines (.6); correspond with M. Russell regarding same (.1).   | Murphy, Joseph      | 0.70         | 696.50           |



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| <b>Date</b>                              | <b>Services</b>  | <b>Timekeeper</b> | <b>Hours</b>        | <b>Value</b>       |
|--|--|-------------------|---------------------|--------------------|
| 31-Oct-24                                | Analyze revised October time entries for compliance with U.S. Trustee's guidelines (.6); correspond with internal working group regarding same (.2). | Murphy, Joseph    | 0.80                | 796.00             |
| 04-Nov-24                                | Analyze (.2) and comment on (.1) October time entries for compliance with U.S. Trustee's guidelines.   | Mannal, Doug      | 0.30                | 562.50             |
| 05-Nov-24                                | Further comment on October time entries for compliance with U.S. Trustee's guidelines.   | Mannal, Doug      | 0.40                | 750.00             |
| 05-Nov-24                                | Correspond with internal working group regarding finalizing of October time entries.   | Murphy, Joseph    | 0.20                | 199.00             |
| 25-Nov-24                                | Correspond with internal working group regarding analysis of October time entries.   | Murphy, Joseph    | 0.20                | 199.00             |
| 25-Nov-24                                | Correspond with internal working group regarding October time entries (.2); analyze same for compliance with U.S. Trustee's guidelines (.1).         | Smolarski, Darren | 0.30                | 298.50             |
| 26-Nov-24                                | Analyze October time entries for compliance with U.S. Trustee's guidelines (1.5); correspond with internal working group regarding same (.3).        | Murphy, Joseph    | 1.80                | 1,791.00           |
| <b>Total: 032 Time Entry Review</b>      |  |                   | <b>9.80</b>         | <b>10,577.00</b>   |
| Client Accommodation - Time Entry Review |  |                   |                     | (10,577.00)        |
|  |  |                   | <b>Current Fees</b> | <b>\$29,383.50</b> |

**HORRISON FOERSTER**034024-0000001  
BANKRUPTCYInvoice Number: 6378475  
Invoice Date: December 06, 2024**Timekeeper Summary**

| <b>No.</b> | <b>Timekeeper</b>                        | <b>Hours</b> | <b>Rate</b>  | <b>Value</b>       |
|------------|--|--------------|--------------|--------------------|
| 26707      | Mannal, Doug                             | 1.90         | 1,875.00     | 3,562.50           |
| 23754      | Russell, Miranda K.                      | 16.00        | 1,170.00     | 18,720.00          |
| 26524      | Murphy, Joseph                           | 8.60         | 995.00       | 8,557.00           |
| 25856      | Smolarski, Darren                        | 8.20         | 995.00       | 8,159.00           |
| 26914      | Coffey, Cameron Tower                    | 2.60         | 370.00       | 962.00             |
|            | Client Accommodation - Time Entry Review |              |              | (10,577.00)        |
|            |  | <b>Total</b> | <b>37.30</b> | <b>\$29,383.50</b> |

**Task Code Summary**

| <b>Task Code</b> | <b>Description</b>                       | <b>Hours</b> | <b>Value</b>       |
|------------------|--|--------------|--------------------|
| 007              | Case Administration                      | 2.70         | 1,061.50           |
| 011              | Employment and Fee Applications          | 24.80        | 28,322.00          |
| 032              | Time Entry Review                        | 9.80         | 10,577.00          |
|                  | Client Accommodation - Time Entry Review |              | (10,577.00)        |
|                  |  | <b>Total</b> | <b>37.30</b>       |
|                  |  |              | <b>\$29,383.50</b> |

**MORRISON FOERSTER**034024-0000001  
BANKRUPTCYInvoice Number: 6378475  
Invoice Date: December 06, 2024**Prior Open Invoices**

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

| <b>Date</b>                      | <b>Invoice Number</b> | <b>Currency</b> | <b>Original Invoice Amount</b> | <b>Payments Applied</b> | <b>Amount Outstanding</b> |
|----------------------------------|-----------------------|-----------------|--------------------------------|-------------------------|---------------------------|
| 30-Aug-24                        | 6350200               | USD             | 1,931,885.08                   | (1,917,493.00)          | 14,392.08                 |
| 24-Sep-24                        | 6355864               | USD             | 455,560.02                     | 0.00                    | 455,560.02                |
| 24-Oct-24                        | 6365155               | USD             | 346,256.43                     | 0.00                    | 346,256.43                |
| 05-Nov-24                        | 6368467               | USD             | 293,853.51                     | 0.00                    | 293,853.51                |
| <b>Total Prior Open Invoices</b> |                       |                 |                                |                         | <b>\$1,110,062.04</b>     |

**MORRISON FOERSTER**

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MORRISON & FOERSTER LLP

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

**Taxpayer ID #:** [REDACTED]  
Invoice Number: 6378475  
Invoice Date: December 06, 2024

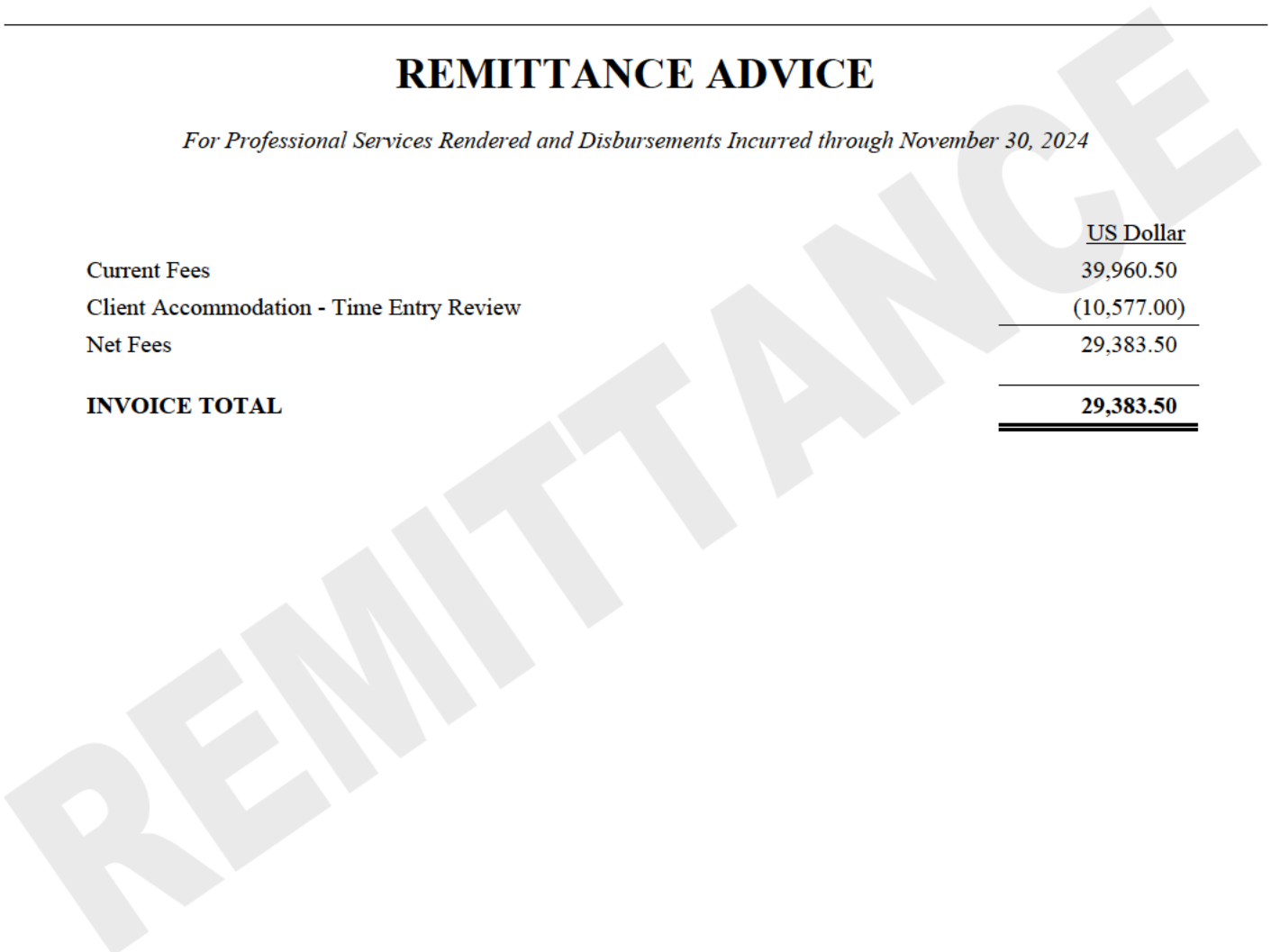
Client/Matter Number: 034024-0000001  
Billing Atty: DOUG MANNAL

Matter Name: BANKRUPTCY

## REMITTANCE ADVICE

*For Professional Services Rendered and Disbursements Incurred through November 30, 2024*

|  | <u>US Dollar</u>               |
|--|--------------------------------|
| Current Fees                             | 39,960.50                      |
| Client Accommodation - Time Entry Review | (10,577.00)                    |
| Net Fees                                 | <u>29,383.50</u>               |
| <b>INVOICE TOTAL</b>                     | <b><u><u>29,383.50</u></u></b> |



[REDACTED]