

**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)
	)	
	)	<b>Re: Docket No. 779</b>

**NOTICE OF FILING OF SUPPLEMENT TO 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**

**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* [Docket No. 779] (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, Cole Schotz requested final approval of \$492,500.00<sup>2</sup> in fees and \$14,109.86 in expenses incurred for the period commencing July 4, 2024 through October 17, 2024 (the “Final Period”). Cole Schotz also

<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 \$25,000.00 in fees and expenses for the Supplemental Period (as defined herein).



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 any comments thereto.

**PLEASE TAKE FURTHER NOTICE** that Cole Schotz hereby files the supplement (the “Supplement”) to the Final Fee Application, which is attached hereto as **Exhibit A**. As set forth in the Supplement, Cole Schotz has incurred \$16,102.50 in fees and \$62.20 in actual and necessary expenses during the Supplemental Period.<sup>3</sup>

**PLEASE TAKE FURTHER NOTICE** that Cole Schotz 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.

**PLEASE TAKE FURTHER NOTICE** that Cole Schotz requests (i) final approval and allowance of compensation for professional services rendered during the Supplemental Period in the amount of \$16,102.50, together with reimbursement for actual and necessary expenses incurred during the Supplemental Period in the amount of \$62.20 and (ii) final approval and allowance of compensation for professional services rendered during the Final Period in the amount of \$467,195.00,<sup>4</sup> together with reimbursement for actual and necessary expenses incurred during the Final Period in the amount of \$14,109.86. Accordingly, Cole Schotz seeks final approval and allowance of compensation in the amount of \$483,297.50, together with reimbursement for actual and necessary expenses in the amount of \$14,172.06.

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<sup>3</sup> Cole Schotz does not intend to further supplement its Final Fee Application with any additional fees and expenses.

<sup>4</sup> This amount does not include the estimated \$25,000.00 in fees and expenses for the Supplemental Period, but does include a voluntary reduction of \$305.00 to address informal comments received from the Office of the United States Trustee.

Dated: December 12, 2024

*/s/ Justin R. Alberto*

**COLE SCHOTZ P.C.**

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Patrick J. Reilley (No. 4451)  
Stacy L. Newman (No. 5044)  
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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*)  
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*Co-Counsel to the Official Committee  
of Unsecured Creditors*

**EXHIBIT A**



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

Invoice Date: December 4, 2024  
 Invoice Number: 994021  
 Matter Number: 68099-0001

**Re:** OFFICIAL COMMITTEE OF UNSECURED CREDITORS

FOR PROFESSIONAL SERVICES THROUGH DECEMBER 4, 2024

<b>FEE APPLICATION MATTERS/OBJECTIONS</b>			<b>32.90</b>	<b>16,102.50</b>
<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/18/24	MMH	CALCULATE FINAL FEE APP FILING DEADLINES	0.10	43.00
10/23/24	MMH	CIRCULATE DRAFT SEPTEMBER FEE APP TO S. NEWMAN AND M. FITZPATRICK	0.10	43.00
10/23/24	MMH	CORRESPONDENCE WITH M. FITZPATRICK RE: FINAL FEE APP	0.10	43.00
10/23/24	MMH	REVISE SEPTEMBER FEE APP	0.30	129.00
10/23/24	SLN	REVIEW OF AND REVISIONS TO SEPTEMBER FEE APPLICATION (.2); CORRESPONDENCE WITH CS TEAM (.1);	0.30	240.00
10/24/24	MMH	CORRESPONDENCE WITH MOFO TEAM RE: FILING OF SEPTEMBER FEE APPS	0.10	43.00
10/25/24	MMH	COORDINATE FILING OF MOFO SEPTEMBER FEE APP	0.20	86.00
10/25/24	MMH	FINALIZE CS SEPTEMBER FEE APP FOR FILING	0.10	43.00
10/25/24	LSM	REVISE, FILE AND ORGANIZE SERVICE OF TWO MONTHLY FEE APPLICATIONS FOR COLE SCHOTZ AND MORRISON & FOERSTER	0.80	320.00
10/25/24	LSM	UPDATE BANKRUPTCY CASE CALENDAR WITH OBJECTION AND FILING DEADLINES FOR FEE APPLICATIONS	0.30	120.00
10/25/24	MMH	COORDINATE FILING OF CS SEPTEMBER FEE APP	0.10	43.00
10/30/24	MEF	EMAILS W/ S. ROGERS CHURCHILL RE: FINAL FEE APP HEARING	0.20	115.00
10/30/24	MEF	CALL W/ M. RUSSELL RE: FINAL FEE APP HEARING AND FEE APP PREPARATION TIMELINE & EMAILS W/ MOFO AND M3 TEAMS	0.20	115.00
11/05/24	MMH	CORRESPONDENCE WITH ACCOUNTING RE: FINAL FEE APP	0.20	86.00
11/05/24	MMH	CONFER WITH M. FITZPATRICK RE: FINAL FEE APP PREPARATION	0.20	86.00
11/05/24	MMH	CORRESPONDENCE WITH M. FITZPATRICK RE: FINAL FEE APP	0.10	43.00
11/05/24	MMH	DRAFT FINAL FEE APP	0.20	86.00
11/05/24	MEF	EMAILS W/ M. HARTLIPP RE FINAL FEE APP PREP	0.10	57.50
11/05/24	MEF	CALL W/ M. HARTLIPP RE: PROFESSIONAL FEE ESCROW	0.10	57.50

**COLE SCHOTZ P.C.**

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

Invoice Number 994021  
December 4, 2024  
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/05/24	SLN	CORRESPONDENCE WITH CS TEAM REGARDING FINAL FEE APPLICATION (.1);	0.10	80.00
11/06/24	MMH	CONTINUE DRAFTING FINAL FEE APP	1.20	516.00
11/07/24	MMH	CORRESPONDENCE WITH UCC PROFESSIONALS RE: DRAFT FINAL FEE APP	0.20	86.00
11/07/24	MMH	CONTINUE DRAFTING FINAL FEE APP	5.00	2,150.00
11/07/24	MEF	EMAILS W/ M. RUSSEL AND E. GREENHAUS RE: FINAL FEE APP PREP	0.10	57.50
11/08/24	MMH	PREPARE BUDGET FOR FINAL FEE APP	1.50	645.00
11/08/24	MMH	FURTHER CORRESPONDENCE WITH M3 AND MOFO RE: FINAL FEE APPS	0.30	129.00
11/08/24	MEF	EMAILS W S. NEWMAN, M. HARTLIPP, P. REILLEY RE: MOFO FINAL FEE APP INQUIRY	0.20	115.00
11/08/24	SLN	CORRESPONDENCE WITH CS TEAM REGARDING FINAL FEE APPS;	0.20	160.00
11/10/24	MEF	REVIEW COLE SCHOTZ FINAL FEE APP AND EMAILS W/ M. HARTLIPP, S. NEWMAN, AND P. REILLEY RE SAME	2.30	1,322.50
11/11/24	MMH	REVIEW CNO RE:CS AND MOFO THIRD MONTHLY FEE APPS	0.20	86.00
11/11/24	MMH	REVIEW S. NEWMAN COMMENTS TO FINAL FEE APP AND ADDRESS SAME	0.90	387.00
11/11/24	MMH	CIRCULATE DRAFT FINAL FEE APP TO J. ALBERTO FOR REVIEW	0.10	43.00
11/11/24	MMH	CONFER WITH M. RUSSELL RE: FINALIZING FINAL FEE APPS	0.20	86.00
11/11/24	MMH	CONFER WITH M3 RE: FINAL FEE APP	0.10	43.00
11/11/24	MMH	CONFER WITH S. NEWMAN RE: FINAL FEE APP	0.30	129.00
11/11/24	MMH	CORRESPONDENCE WITH M3 RE: FINAL FEE APPS	0.20	86.00
11/11/24	MMH	CALL WITH B. DOLPHIN RE: FINAL FEE APPS	0.10	43.00
11/11/24	MMH	CONFER WITH M. RUSSELL RE: FINAL FEE APP PREPARATION	0.30	129.00
11/11/24	MEF	EMAILS AND CORRES. W/ M. HARTLIPP RE FINALIZING AND FILING COLE SCHOTZ FEE APPLICATIONS, AND INCORPORATING COMMENTS INTO SAME	0.40	230.00
11/11/24	MEF	CALL W/ M. HARTLIPP AND S. NEWMAN RE: FINALIZING COLE SCHOTZ FINAL FEE APP AND QUESTIONS TO SAME	0.20	115.00
11/11/24	LSM	UPATE, FILE AND ORGANIZE SERVICE OF THREE FINAL FEE APPLICATIONS FOR MOFO, COLE SCHOTZ AND M3 PARTNERS	0.90	360.00
11/11/24	LSM	ASSIST WITH REVISIONS AND FILING PREPARATIONS FOR FINAL FEE APPLICATIONS FOR MOFO, COLE SCHOTZ AND M3 PARTNERS	2.60	1,040.00
11/11/24	MMH	REVIEW PLAN RE: MONTHLY FEE STATEMENTS	0.10	43.00
11/11/24	MMH	FINALIZE AND COORDINATE FILING OF COMMITTEE PROFESSIONALS FINAL FEE APPS	0.80	344.00
11/11/24	MMH	REVIEW M3 FINAL FEE APP	0.20	86.00

**COLE SCHOTZ P.C.**

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/11/24	SLN	REVIEW OF AND REVISIONS TO FINAL FEE APPLICATION; CORRESPONDENCE AND TELEPHONE CALL WITH CS TEAM REGARDING CNO FOR THIRD MONTHLY AND FINAL FEE APPLICATION;	1.80	1,440.00
11/12/24	MEF	EMAILS W/ M. RUSSELL RE: FINAL FEE APPS AND STATUS OF HEARING FOR SAME & REVIEW EMAILS FROM MNAT TEAM AND M. HARTLIPP RE SAME	0.20	115.00
11/13/24	MEF	EMAILS W/ M. RUSSELL RE: PAYMENT OF COMMITTEE FEES FROM PROFESSIONAL FEE ESCROW UNDER CONFIRMED PLAN	0.10	57.50
11/14/24	MMH	CORRESPONDENCE WITH ACCOUNTING RE: LEDES FILES FOR UST	0.10	43.00
11/14/24	MEF	EMAILS W/ M. HARTLIPP RE: LEDES FILE FOR COLE SCHOTZ APP TO SEND TO US TRUSTEE	0.10	57.50
11/14/24	MMH	CIRCULATE LEDES FILES TO UST	0.20	86.00
11/25/24	MMH	DRAFT CNO FOR MOFO FEE APP	0.30	129.00
11/26/24	MMH	COORDINATE FILING OF CNO FOR FOURTH MONTHLY MOFO FEE APP	0.10	43.00
11/26/24	MMH	CORRESPONDENCE WITH D. SMOLARSKI RE: FINAL FEE APPS	0.20	86.00
11/26/24	LSM	COMPILE, REVIEW AND ORGANIZE ALL FINAL FEE APPLICATIONS FOR DECEMBER 9, 2024 HEARING	0.70	280.00
11/27/24	MMH	CORRESPONDENCE WITH P. REILLEY RE: UST COMMENTS TO FEE APP	0.40	172.00
11/27/24	SLN	REVIEW UST COMMENTS TO COLE SCHOTZ FINAL FEE APPLICATION; CORRESPONDENCE WITH CS TEAM REGARDING PROPOSED RESPONSE;	0.30	240.00
12/02/24	MMH	CORRESPONDENCE WITH MOFO RE: SUPPLEMENT TO FINAL FEE APPS	0.10	43.00
12/02/24	MMH	COORDINATE PREPARATION OF FINAL FEE APP BINDERS	0.10	43.00
12/02/24	MMH	CORRESPONDENCE WITH CS TEAM RE: UST COMMENTS TO CS FINAL FEE APP	0.10	43.00
12/02/24	MMH	REVIEW AND REVISE FEE APP. BINDER INDEX	0.70	301.00
12/02/24	JRA	CORRESPOND WITH S. NEWMAN RE FEE APP	0.20	185.00
12/02/24	SLN	TELEPHONE CALL WITH CS TEAM REGARDING FINAL FEE APPLICATIONS (.1); DRAFT RESPONSES TO UST INFORMAL COMMENTS AND CORRESPONDENCE WITH CS TEAM (.2); EMAIL TO UST (.1); REVIEW OF AND REVISIONS TO FINAL FEE APPLICATION INDEX (.1);	0.50	400.00
12/03/24	MMH	CORRESPONDENCE WITH CS TEAM RE: SUPPLEMENT TO FINAL FEE APP	0.10	43.00
12/03/24	MMH	REVIEW AND REVISE CHART OF PROFESSIONALS FINAL FEES	0.80	344.00
12/04/24	MMH	CONTINUE PREPARING FINAL FEE APP COC CHART	1.10	473.00
12/04/24	MMH	CONFER WITH S. NEWMAN RE: FINAL FEE APP COC PREP.	0.10	43.00
12/04/24	MMH	DRAFT NOTICE OF FILING RE: SUPPLEMENTAL INVOICE AND COORDINATE FILING PREPARATION	1.00	430.00

**COLE SCHOTZ P.C.**

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/04/24	MMH	CORRESPONDENCE WITH PROFESSIONALS RE: FINAL FEE APP SUPPLEMENTS	0.30	129.00
12/04/24	JRA	CORRESPOND WITH M. HARTLIPP RE FINAL FEE APP	0.20	185.00
12/04/24	JRA	FURTHER EMAILS WITH S. NEWMAN RE FEE APP	0.10	92.50
12/04/24	MMH	CORRESPONDENCE WITH S. NEWMAN RE: FINAL FEE APP PPLAN LANGUAGE	0.20	86.00
12/04/24	MMH	CORRESPONDENCE WITH CS TEAM RE: FEE SUPPLEMENT	0.10	43.00
12/04/24	SLN	TELEPHONE CALL WITH M. HARTLIPP REGARDING FINAL FEE APP (.1); CORRESPONDENCE WITH DEBTORS (.1);	0.20	160.00
TOTAL HOURS			32.90	

PROFESSIONAL SERVICES:

\$16,102.50

**TIMEKEEPER SUMMARY**

<u>NAME</u>	<u>TIMEKEEPER TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Justin R. Alberto	Member	0.50	925.00	462.50
Larry S. Morton	Paralegal	5.30	400.00	2,120.00
Melissa M. Hartlipp	Associate	19.50	430.00	8,385.00
Michael E. Fitzpatrick	Associate	4.20	575.00	2,415.00
Stacy L. Newman	Member	3.40	800.00	2,720.00
<b>Total</b>		<b>32.90</b>		<b>\$16,102.50</b>

**COST DETAIL**

<u>DATE</u>	<u>Description</u>	<u>QUANTITY</u>	<u>AMOUNT</u>
10/07/24	COURT FEES	30.00	3.00
10/07/24	COURT FEES	7.00	0.70
10/07/24	COURT FEES	7.00	0.70
10/09/24	COURT FEES	2.00	0.20
10/09/24	COURT FEES	15.00	1.50
10/09/24	COURT FEES	3.00	0.30
10/09/24	COURT FEES	10.00	1.00
10/09/24	COURT FEES	30.00	3.00
10/09/24	COURT FEES	1.00	0.10
10/09/24	COURT FEES	6.00	0.60
10/09/24	COURT FEES	10.00	1.00
10/09/24	COURT FEES	5.00	0.50
10/09/24	COURT FEES	15.00	1.50
10/09/24	COURT FEES	30.00	3.00



**COLE SCHOTZ P.C.**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
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<u>DATE</u>	<u>Description</u>	<u>QUANTITY</u>	<u>AMOUNT</u>
10/09/24	COURT FEES	3.00	0.30
10/09/24	COURT FEES	5.00	0.50
10/09/24	COURT FEES	7.00	0.70
10/09/24	COURT FEES	4.00	0.40
10/09/24	COURT FEES	30.00	3.00
10/09/24	COURT FEES	8.00	0.80
10/09/24	COURT FEES	15.00	1.50
10/09/24	COURT FEES	30.00	3.00
10/09/24	COURT FEES	2.00	0.20
10/09/24	COURT FEES	2.00	0.20
10/09/24	COURT FEES	25.00	2.50
11/06/24	DELIVERY/COURIERS	1.00	32.00
<b>Total</b>			<b>\$62.20</b>

TOTAL SERVICES AND COSTS: \$ 16,164.70