

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

FISKER INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11390 (TMH)

(Jointly Administered)

Re: D.I. 773

**NOTICE OF FILING OF SUPPLEMENT TO FIFTH MONTHLY FEE STATEMENT  
(FOR THE PERIOD OCTOBER 1, 2024 THROUGH OCTOBER 17, 2024) AND FINAL  
FEE APPLICATION OF MORRIS, NICHOLS, ARSHT & TUNNELL LLP, AS  
BANKRUPTCY COUNSEL FOR THE DEBTORS AND DEBTORS IN POSSESSION,  
FOR ALLOWANCE OF COMPENSATION AND FOR REIMBURSEMENT OF ALL  
ACTUAL AND NECESSARY EXPENSES INCURRED FOR THE PERIOD  
JUNE 17, 2024, THROUGH AND INCLUDING OCTOBER 17, 2024**

**PLEASE TAKE NOTICE** that on November 11, 2024, Morris, Nichols, Arsht & Tunnell LLP (“**Morris Nichols**”) filed the *Fifth Monthly Fee Statement (for the Period October 1, 2024 Through October 17, 2024)* and *Final Fee Application of Morris, Nichols, Arsht & Tunnell LLP, as Bankruptcy Counsel for the Debtors and Debtors In Possession, for Allowance of Compensation and for Reimbursement of All Actual and Necessary Expenses Incurred for the Period June 17, 2024, Through and Including October 17, 2024* [D.I. 773] (the “**Final Fee Application**”).

**PLEASE TAKE FURTHER NOTICE** that in the Final Fee Application, Morris Nichols requested final approval of \$2,473,165.50 in fees and \$91,775.58 in expenses for the period commencing June 17, 2024 through October 17, 2024 (the “**Final Period**”). This request included an estimate of fees and expenses that Morris Nichols expected to incur after October 17, 2024 (the “**Supplemental Period**”), including in connection with preparing the Final Fee Application, assisting the Debtors’ other professionals in preparing and filing their final fee applications, and preparing a final fee hearing, if necessary.

**PLEASE TAKE FURTHER NOTICE** that attached hereto as **Exhibit A** is a supplement to the Final Fee Application, detailing the fees and expenses actually incurred in the Supplemental Period.

**PLEASE TAKE FURTHER NOTICE** that Morris Nichols believes that the fees and expenses included in **Exhibit A** comply with the requirements of Rule 2016-2 of the Local Rules

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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 Dr, La Palma, CA 90623.



of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware.

Dated: December 19, 2024  
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Sophie Rogers Churchill  
Robert J. Dehney, Sr. (No. 3578)  
Andrew R. Remming (No. 5120)  
Brenna A. Dolphin (No. 5604)  
Sophie Rogers Churchill (No. 6905)  
Echo Yi Qian (No. 7330)  
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-and-

DAVIS POLK & WARDWELL LLP

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Darren S. Klein (admitted *pro hac vice*)  
James I. McClammy (admitted *pro hac vice*)  
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*Counsel to the Debtors and Debtors in Possession*

**EXHIBIT A**

Fisker, Inc.

Invoice Date:

December 19, 2024

Invoice Number:

2414251

Matter Number:

60407-0004

**Timekeeper Summary**

<u>Name</u>	<u>Timekeeper Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Remming, Andrew	Partner	2.1	1,145	2,404.50
Dolphin, Brenna	Special Counsel	3.9	965	3,763.50
Rogers Churchill, Sophie	Associate	24.3	635	15,430.50
Vale, Desiree	Paralegal	19.3	395	7,623.50
Weidman, Rebecca	Paralegal	0.5	395	197.50
Reed, Marie	Legal Assistant	1.5	355	532.50
	<b>Total</b>	<b>51.6</b>		<b>\$29,952.00</b>

**Time Detail****Task Code:** B160 Fee Applications (MNAT - Filing)

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/27/24	Rogers Churchill, Sophie	Finalize exhibits for September fee application.	0.9	571.50
10/28/24	Vale, Desiree	Draft Morris Nichols Fourth Fee Application	1.2	474.00
10/28/24	Rogers Churchill, Sophie	Revise September expense detail to comply with local rule 2016-2.	0.4	254.00
10/28/24	Rogers Churchill, Sophie	Email to A. Remming re September fee application.	0.1	63.50
10/29/24	Vale, Desiree	Update Morris Nichols Fourth Fee Application	0.7	276.50
10/29/24	Rogers Churchill, Sophie	Review, revise, and redact exhibits for final fee application.	0.6	381.00
10/30/24	Remming, Andrew	Review and edit draft MNAT September fee application.	0.4	458.00
10/30/24	Remming, Andrew	Confer with SR Churchill re draft MNAT September fee application.	0.1	114.50
10/31/24	Rogers Churchill, Sophie	Work on final fee application.	0.5	317.50
11/04/24	Vale, Desiree	Draft shell re Morris Nichols Final Fee Application (1.7); compile charts (.5)	2.2	869.00

Fisker, Inc.

Invoice Date: December 19, 2024

Invoice Number: 2414251

Matter Number: 60407-0004

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/04/24	Rogers Churchill, Sophie	Review and revise final fee application.	5.8	3,683.00
11/06/24	Remming, Andrew	Review and edit revised version of draft MNAT September fee application.	0.5	572.50
11/07/24	Vale, Desiree	Review and respond to e-mail from S. Rogers Churchill re Morris Nichols Final Fee Application e-filing plan (.1); update and provide same (.1)	0.2	79.00
11/07/24	Vale, Desiree	Update Morris Nichols Final Fee Application	0.4	158.00
11/07/24	Reed, Marie	Review and respond to email from S. Rogers Churchill re filing fee application (.1); prepare and e-file Fourth Monthly Fee Statement of Morris, Nichols, Arsht & Tunnell LLP, as Bankruptcy Counsel for the Debtors and Debtors in Possession, for Allowance of Monthly Compensation and for Reimbursement of All Actual and Necessary Expenses Incurred for the Period September 1, 2024, Through and Including September 30, 2024 (.2)	0.3	106.50
11/07/24	Rogers Churchill, Sophie	Revise October fee application.	10.3	6,540.50
11/08/24	Rogers Churchill, Sophie	Final revisions to MNAT final fee application.	3.5	2,222.50
11/11/24	Vale, Desiree	Update Morris Nichols Final Fee Application (1.2); correspondence with S. Rogers Churchill re same (.1); prepare and e-file same (.4); coordinate service (.1)	1.8	711.00
11/11/24	Remming, Andrew	Review and edit final fee app and conf with SR Churchill re same.	1.1	1,259.50
11/12/24	Vale, Desiree	E-mail LEDES file to U.S. Trustee re Morris Nichols final fee application (October portion)	0.1	39.50
11/21/24	Vale, Desiree	Draft CNOs to Morris Nichols September Fee Application	0.2	79.00

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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/22/24	Reed, Marie	Review and respond to email from B. Dolphin re filing CNO (.1); prepare and e-file Certificate of No Objection Regarding Fourth Monthly Fee Statement of Morris, Nichols, Arsht & Tunnell LLP, as Bankruptcy Counsel for the Debtors and Debtors in Possession, for Allowance of Monthly Compensation and for Reimbursement of All Actual and Necessary Expenses Incurred for the Period September 1, 2024, Through and Including September 30, 2024 (.2)	0.3	106.50
11/22/24	Dolphin, Brenna	Review docket, update draft certificate of no objection, and coordinate with M. Reed re filing certificate of no objection re Morris Nichols September Fee Application.	0.3	289.50
11/25/24	Dolphin, Brenna	Coordinate with J. DiDonato re sending confirmation to liquidating trustee re payment of September 2024 fees and expenses for Morris Nichols.	0.1	96.50
12/02/24	Dolphin, Brenna	Communicate with K. Winiarski and J. DiDonato re payment of September fees and expenses of Morris Nichols.	0.1	96.50
12/04/24	Dolphin, Brenna	Meet with A. Remming and S. Rogers Churchill re final fee application and resolving questions from U.S. Trustee.	0.3	289.50
12/05/24	Rogers Churchill, Sophie	Respond to email from UST re final fee application.	0.3	190.50
12/10/24	Dolphin, Brenna	Confer with D. Vale re drafting certification of counsel re final fee application.	0.1	96.50
12/11/24	Dolphin, Brenna	Communicate with D. Vale re certification of counsel re final fee application.	0.1	96.50
12/12/24	Dolphin, Brenna	Communicate with S. Rogers Churchill and D. Vale re email from Chambers re final fee application.	0.2	193.00
12/13/24	Dolphin, Brenna	Revise draft certification of counsel re final fee application.	0.3	289.50

Fisker, Inc.

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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/13/24	Dolphin, Brenna	Communicate with S. Rogers Churchill (.1) and D. Vale (.1) re final fee application order and certification of counsel regarding same.	0.2	193.00
12/13/24	Rogers Churchill, Sophie	Call with R. Steinberg re final fee applications (.1); call with UST re same (.4); confer with A .Remming re same (.2); email to L. Richenderfer re same (.1); respond to email from B. Dolphin re same (.1).	0.9	571.50
12/16/24	Rogers Churchill, Sophie	Draft supplement to final fee application.	0.3	190.50
<b>Total</b>			<b>34.8</b>	<b>21,930.00</b>

**Task Code:** B165 Fee Applications (Others - Filing)

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/18/24	Rogers Churchill, Sophie	Emails with E. Qian re payment of fees for OCPs post-effective date.	0.3	190.50
10/18/24	Rogers Churchill, Sophie	Review final fee application precedent and email to K. Winiarski re same.	0.2	127.00
11/01/24	Weidman, Rebecca	Prepare Verita fourth monthly fee application for filing (.2); Correspondence with E. Qian re: same (.1); File same (.1); Coordinate service of same (.1)	0.5	197.50
11/06/24	Reed, Marie	Review and respond to email from S. Rogers Churchill re filing fee application (.1); prepare and e-file Fourth Monthly Fee Statement of Davis Polk & Wardwell LLP, as Bankruptcy Counsel for the Debtors and Debtors in Possession, for Allowance of Monthly Compensation and for Reimbursement of All Actual and Necessary Expenses Incurred for the Period September 1, 2024, Through and Including September 30, 2024 (.2)	0.3	106.50
11/11/24	Vale, Desiree	Review and respond to e-mail from S. Rogers Churchill re Professionals Final Fee Applications Notices (.1); Draft 4 Notices (.5)	0.6	237.00

Fisker, Inc.

Invoice Date:

December 19, 2024

Invoice Number:

2414251

Matter Number:

60407-0004

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/11/24	Dolphin, Brenna	Communicate with S. Berde re final fee application of RBSM and filing same.	0.3	289.50
11/11/24	Dolphin, Brenna	Call from M. Hartlipp re timing of estate professionals filing final fee applications.	0.1	96.50
11/12/24	Vale, Desiree	Prepare and e-file Davis Polk Final Fee Application (.5); coordinate service (.1)	0.6	237.00
11/12/24	Dolphin, Brenna	Coordinate with D. Vale re revising RBSM fee application to include additional detail.	0.2	193.00
11/13/24	Vale, Desiree	Update Huron Final Fee Application Notice	0.1	39.50
11/13/24	Vale, Desiree	Review and respond to e-mail from S. Rogers Churchill re Huron Final Fee Application review and changes (.1); prepare and update final application and revert (1.4)	1.5	592.50
11/13/24	Vale, Desiree	Prepare and e-file Huron Final Fee Application (.4); coordinate service (.1)	0.5	197.50
11/18/24	Dolphin, Brenna	Revise first and final fee application of RBSM (.2); confer with S. Berde re same (.1).	0.3	289.50
11/19/24	Dolphin, Brenna	Communicate with S. Berde re updates to fee application, including breakdown by professional and task (.2); coordinate with D. Vale re revising draft to incorporate same (.1).	0.3	289.50
11/21/24	Vale, Desiree	Review and respond to e-mails from E. Qian re Fisker CNOs e-filing (.1); draft CNOs to KCC and Davis Polk (.4)	0.5	197.50
11/21/24	Vale, Desiree	Update RBSM First and Final Fee Application (.9); correspondence with S. Rogers Churchill and B. Dolphin re same (.1)	1.0	395.00
11/21/24	Vale, Desiree	E-file RBSM First and Final Fee Application (.4); coordinate service (.1)	0.5	197.50
11/21/24	Vale, Desiree	Draft Exhibit A re Final Fee Hearing 12/9	1.0	395.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/21/24	Reed, Marie	Review and respond to email from E. Qian re filing CNO (.1); prepare and e-file Certificate of No Objection Regarding Fourth Monthly Fee Statement of Davis Polk & Wardwell LLP, as Bankruptcy Counsel for the Debtors and Debtors in Possession, for Allowance of Monthly Compensation and for Reimbursement of All Actual and Necessary Expenses Incurred for the Period September 1, 2024 Through and Including September 30, 2024 (.2)	0.3	106.50
11/21/24	Reed, Marie	Review and respond to email from E. Qian re filing CNO (.1); prepare and e-file Certificate of No Objection Regarding Fourth Monthly Fee Application of Kurtzman Carson Consultants, LLC dba Verita Global, as Administrative Advisor to the Debtors, for the Period from September 1, 2024 Through and Including September 30, 2024 (.2)	0.3	106.50
11/21/24	Dolphin, Brenna	Communicate with S. Berde re final review and approval of RBSM fee application (.3); finalize RBSM fee application (.1); coordinate with D. Vale re filing RBSM fee application (.2); send as-filed version to S. Berde (.1).	0.7	675.50
11/30/24	Vale, Desiree	Update and hyperlink Exhibit A re final fee binders for December 9 hearing (.6); compile pleadings and prepare searchable pdf re same (1.0); correspondence with S. Rogers Churchill re same (.1)	1.7	671.50
12/01/24	Vale, Desiree	Prepare and assemble final fee binders for December 9 hearing	2.0	790.00
12/02/24	Vale, Desiree	Review and respond to e-mail from S. Rogers Churchill re final fee hearing binders and schedules submission to Chambers (.1); coordinate physical delivery (.1); e-mail Chambers with Exhibit A and searchable pleadings (.2)	0.4	158.00
12/03/24	Vale, Desiree	Compile and prepare charts re final fee order (.3); conf. with S. Rogers Churchill re other professionals handling (.1); calendar hearing with pleadings (.1)	0.5	197.50

Fisker, Inc.

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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/06/24	Vale, Desiree	Draft CoC re Final Omnibus Fee Hearing December 9	0.7	276.50
12/11/24	Vale, Desiree	Review and respond e-mail from B. Dolphin re Final Omnibus Fee Hearing updates (.1) updated the order and CoC to include all professionals and agreed-upon reductions (.4)	0.5	197.50
12/12/24	Vale, Desiree	Conference with S. Rogers Churchill and B. Dolphin re U.S. Trustee and Court comments to final fee applications (.1) incorporate Court comments in final fee order (.3)	0.4	158.00
12/13/24	Dolphin, Brenna	Respond to inquiry from committee counsel re order approving final fee applications and request confirmation from committee re accuracy of final fees and expenses for committee professionals.	0.3	289.50
12/13/24	Rogers Churchill, Sophie	Emails with R. Steinberg and chambers re DPW final fee application.	0.2	127.00
<b>Total</b>			<b>16.8</b>	<b>8,022.00</b>

**Cost Summary**

<u>Description</u>	<u>Amount</u>
Pacer	168.70
In-House Printing - black & white	346.60
Courier/Delivery Service	20.00
<b>Total</b>	<b>\$535.30</b>

Fisker, Inc.

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**Cost Detail**

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Amount</u>
10/18/24	Pacer	65.0	6.50
10/23/24	Pacer	42.0	4.20
10/23/24	In-House Printing - black & white	4.0	0.40
10/25/24	In-House Printing - black & white	122.0	12.20
10/28/24	In-House Printing - black & white	96.0	9.60
10/29/24	In-House Printing - black & white	115.0	11.50
10/30/24	Pacer	3.0	0.30
10/31/24	Pacer	1.0	0.10
11/01/24	Pacer	25.0	2.50
11/04/24	In-House Printing - black & white	53.0	5.30
11/05/24	Pacer	56.0	5.60
11/07/24	In-House Printing - black & white	180.0	18.00
11/07/24	Pacer	108.0	10.80
11/11/24	Pacer	466.0	46.60
11/11/24	In-House Printing - black & white	206.0	20.60
11/12/24	Pacer	83.0	8.30
11/12/24	In-House Printing - black & white	26.0	2.60
11/21/24	Pacer	95.0	9.50
11/22/24	Pacer	30.0	3.00
11/25/24	Pacer	186.0	18.60
11/26/24	Pacer	63.0	6.30
11/27/24	Pacer	173.0	17.30
11/30/24	Pacer	291.0	29.10
11/30/24	In-House Printing - black & white	2,562.0	256.20
12/02/24	In-House Printing - black & white	102.0	10.20
12/02/24	Courier/Delivery Service – Delivery of documents to and from Court for hearings.	1.0	20.00

**Total****\$535.30**

Fisker, Inc.

Invoice Date: December 19, 2024  
 Invoice Number: 2414251  
 Matter Number: 60407-0004

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**Task Summary**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee Applications (MNAT - Filing)	34.80	21,930.00
B165	Fee Applications (Others - Filing)	16.80	8,022.00
<b>Total</b>		<b>51.60</b>	<b>\$29,952.00</b>