

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

In re

FISKER INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11390 (TMH)

(Joint Administration Requested)

Re: D.I. 38, 59, 70

NOTICE OF FILING OF CASH COLLATERAL BUDGET

PLEASE TAKE NOTICE that on June 21, 2024, the debtors and debtors in possession (collectively, the “**Debtors**”) in the above captioned cases filed the *Motion of the Debtors for Entry of Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Scheduling a Further Hearing on the Motion, (V) Granting Related Relief* [Docket No. 38] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that on June 24, 2024, the Court entered the *Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Scheduling a Further Hearing on the Motion, (V) Granting Related Relief* [Docket No. 59] (the “**First Interim Cash Collateral Order**”).

PLEASE TAKE FURTHER NOTICE that on June 25, 2024 the Debtors filed the *Notice of Filing of Proposed Second Interim Cash Collateral Order* [Docket No. 70], which included as Exhibit A, the *Second Interim Order (I) Authorizing the Debtors to Use Cash*

¹ 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.



Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Scheduling a Further Hearing on the Motion, (V) Granting Related Relief (the “**Proposed Second Interim Cash Collateral Order**”).

PLEASE TAKE FURTHER NOTICE that the Debtors hereby file Exhibit 1 to the Proposed Second Interim Cash Collateral Order, the “**Approved Budget**” (as defined therein), a copy of which is attached hereto as Exhibit A.

PLEASE TAKE FURTHER NOTICE that the Debtors intend to present the Approved Budget in connection with the Proposed Second Interim Cash Collateral Order at the hearing scheduled for June 27, 2024 at 3:00 p.m. (ET) (“**Cash Collateral Hearing**”). The Debtors reserve all rights to modify the Approved Budget at or prior to the Cash Collateral Hearing.

Dated: June 26, 2024
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Brenna A. Dolphin

Robert J. Dehney, Sr. (No. 3578)
Andrew R. Remming (No. 5120)
Brenna A. Dolphin (No. 5604)
Sophie Rogers Churchill (No. 6905)
Evanthea Hammer (No. 7061)
1201 N. Market Street, 16th Floor
Wilmington, Delaware 19801
Tel.: (302) 658-9200
rdehney@morrisnichols.com
aremming@morrisnichols.com
bdolphin@morrisnichols.com
srchurchill@morrisnichols.com
ehammer@morrisnichols.com

-and-

DAVIS POLK & WARDWELL LLP
Brian M. Resnick (admitted *pro hac vice*)
Darren S. Klein (admitted *pro hac vice*)
Steven Z. Szanzer (admitted *pro hac vice*)
Richard J. Steinberg (admitted *pro hac vice*)
450 Lexington Avenue
New York, New York 10017
Tel.: (212) 450-4000
brian.resnick@davispolk.com
darren.klein@davispolk.com
steven.szanzer@davispolk.com
richard.steinberg@davispolk.com

Proposed Counsel to the Debtors and Debtors in Possession

EXHIBIT A

Approved Budget

Fisker Inc., et al.

Cash Collateral Budget (USD 000s)

Week Forecast Week Ending	Cash Collateral Budget			Post-Petition Total 9-Weeks Jun 22 - Jul 9
	Week 1 Forecast 28-Jun-24	Week 2 Forecast 05-Jul-24	Week 3 Forecast 09-Jul-24	
Projected Cash Receipts:				
Receipts from Customers	\$ -	\$ -	\$ -	\$ -
Other Receipts	455	-	-	455
Total Receipts	\$ 455	\$ -	\$ -	\$ 455
Projected Cash Disbursements:				
Employee Payroll & Benefits	\$ (1,589)	\$ (951)	\$ (680) ²	\$ (3,220)
Taxes / Regulatory	(116)	(41)	-	(157)
IT / Software	-	-	-	-
Engineering	(112)	-	-	(112)
Critical Vendor Payments	-	-	-	-
After Sales Service	-	-	-	-
Professional Services	-	-	-	-
Board Fees	-	-	-	-
Rent	-	-	-	-
Insurance	-	-	-	-
Freight & Other	(33)	-	-	(33)
Vehicle Buybacks	-	-	-	-
Other	-	-	-	-
Total Operating Disbursements	\$ (1,850)	\$ (992)	\$ (680)	\$ (3,522)
Net Operating Cash Flow / (Deficit)	\$ (1,396)	\$ (992)	\$ (680)	\$ (3,067)
Non Operating:				
Restructuring Professionals ¹	\$ -	\$ -	\$ -	\$ -
Utility Deposits	(63)	-	-	(63)
Non-Insider KERP	-	-	-	-
Total Non Operating	\$ (63)	\$ -	\$ -	\$ (63)
Net Cash Flow / (Deficit)	(\$1,458)	(\$992)	(\$680)	(\$3,130)
Beginning Cash Balance	\$ 11,105	\$ 9,647	\$ 8,655	11,105
Net Cash Flow / (Deficit)	(1,458)	(992)	(680)	(3,130)
Ending Total Cash Balance	\$ 9,647	\$ 8,655	\$ 7,975	\$ 7,975
Less Restricted / Trapped Cash:				
Cash Collateralized LCs	\$ (6,087)	\$ (6,087)	\$ (6,087)	\$ (6,087)
Deposits Relating to Imperfected Liens	(1,006)	(1,006)	(1,006)	(1,006)
Ending Total Cash, Unrestricted	\$ 2,554	\$ 1,563	\$ 883	\$ 883

¹ Debtor professional fees will not be paid during the interim period, but will be included in the carve out and paid later in the case (including in connection with any chapter 7 conversion).

² Represents Company's current estimate of payroll obligation that will accrue in the Second Interim Period. Actual accrued payroll may be reduced to account for, among other things, accelerated wind down of operations.