

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)

(Jointly Administered)

Re: Docket No. 1173

**CERTIFICATE OF NO OBJECTION REGARDING LIQUIDATING TRUSTEE'S
FOURTEENTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) PURSUANT TO 11
U.S.C. § 502, FED. R. BANKR. P. 3007 AND LOCAL RULE 3007-1 TO CERTAIN
(I) AMENDED AND SUPERSEDED CLAIM; AND (II) EQUITY CLAIMS**

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 *Liquidating Trustee's Fourteenth Omnibus Objection (Non-Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain (I) Amended and Superseded Claim; and (II) Equity Claims* [Docket No. 1173] (the "Objection") filed with the United States Bankruptcy Court for the District of Delaware (the "Court") on November 6, 2025. Responses to the Objection were to be filed and served no later than December 1, 2025 at 4:00 p.m. (ET) (the "Objection Deadline").

The Objection Deadline has passed, and no objections or other responsive pleading to the Objection appear on the docket or were served upon the undersigned counsel. It is therefore respectfully requested that the Court enter the Proposed Order attached hereto as **Exhibit A** at the earliest convenience of the Court.

¹ 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.



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Dated: December 2, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Melissa M. Hartlipp

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Co-Counsel to the Liquidating Trustee

Exhibit A

Proposed Form of Order

**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)

(Jointly Administered)

Re: D.I. 1173

**ORDER GRANTING LIQUIDATING TRUSTEE’S FOURTEENTH OMNIBUS
OBJECTION (NON-SUBSTANTIVE) PURSUANT TO 11 U.S.C. § 502, FED. R. BANKR.
P. 3007 AND LOCAL RULE 3007-1 TO CERTAIN (I) AMENDED AND SUPERSEDED
CLAIMS; AND (II) EQUITY CLAIMS**

THIS MATTER having come before the Court² upon the *Liquidating Trustee’s Fourteenth Omnibus Objection (Non-Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain (I) Amended and Superseded Claims; and (II) Equity Claims* (the “**Objection**”), filed by Matthew Dundon, solely in his capacity as the Liquidating Trustee (the “**Liquidating Trustee**”) of the Fisker Liquidating Trust, seeking entry of an order pursuant to 11 U.S.C. § 502, Bankruptcy Rule 3007 and Local Rule 3007-1: (i) disallowing in full and expunging the amended and superseded Claims listed on **Schedule 1** attached hereto (the “**Amended/Superseded Claims**”); and (ii) disallowing in part, or disallowing in full and expunging, as applicable, each Claim identified on **Schedule 2** attached hereto because each such Claim is based upon, either in whole or in part, ownership of shareholder/equity security interests in the Debtors; and it appearing that the Court has jurisdiction over this matter pursuant to 28

¹ 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.

² Any capitalized term used but not otherwise defined herein shall have the meaning ascribed to it in the Objection.

U.S.C. §1334; and it appearing that this is a core proceeding pursuant to 28 U.S.C. §157; and it appearing that venue of this proceeding is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and adequate notice of the Objection and opportunity for response having been given; and it appearing that no other notice need be given; and the Court having considered the Objection, the Disputed Claims listed on **Schedule 1** and **Schedule 2**, and any responses thereto; and upon the record herein; and, after due deliberation and sufficient cause appearing therefore, it is FOUND AND DETERMINED that:

- A. This Objection is a core proceeding under 28 U.S.C. § 157(b)(2).
- B. Each holder of a Disputed Claim listed on **Schedule 1** and **Schedule 2** attached hereto was properly and timely served with a copy of the Objection, the Wright Declaration, this Order, the accompanying schedules of Disputed Claims, and the notice of Objection.
- C. Any entity known to have an interest in the Disputed Claims subject to the Objection has been afforded reasonable opportunity to respond to, or be heard regarding, the relief requested in the Objection.
- D. The relief requested in the Objection is in the best interests of the Debtors' creditors, the Debtors' estates, the Liquidating Trust and other parties-in-interest; and it is therefore:

ORDERED that:

- 1. The Objection is GRANTED as set forth herein.
- 2. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on its merits.
- 3. Each of the Claims listed as an Amended/Superseded Claim on **Schedule 1** hereto is hereby disallowed in full and expunged.

4. The Liquidating Trustee's rights to object to any of the Surviving Claims listed on **Schedule 1** hereto, at any time and for any reason, are fully preserved.

5. Each portion of the Claims listed on **Schedule 2** hereto constituting Equity Claims is hereby disallowed in full and expunged for all purposes.

6. The Liquidating Trustee's rights to object to any of the Surviving Claims listed on **Schedule 2** hereto (if applicable), at any time and for any reason, are fully preserved.

7. The Liquidating Trustee's rights to further object at a later date and on any basis to the Disputed Claims, if necessary, are fully preserved.

8. The official claims register in these Chapter 11 Cases shall be modified in accordance with this Order.

9. The Liquidating Trustee's rights and the rights of other parties in interest to file additional objections to the Disputed Claims or any other Claims (filed or not) which may be asserted against the Debtors and/or the Liquidating Trust, are preserved. Additionally, should one or more of the grounds of objection stated in the Objection be dismissed, the Liquidating Trustee's rights and the rights of other parties in interest to object on other stated grounds or on any other grounds that the Liquidating Trustee or other parties-in-interest may discover are further preserved.

10. Notwithstanding the possible applicability of Bankruptcy Rules 6004, 7062, 9014 or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry. All time periods set forth in the Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

11. This Court shall retain jurisdiction over the Liquidating Trustee and the claimants whose Claims are subject to the Objection with respect to any matters related to or arising from the Objection and the implementation of this Order.

Row	Claimant	Amended and Superseded Claim			Surviving Claim			Reasons for Disallowance
		Claim #	Asserted Claim Amount	Asserted Priority	Claim #	Asserted Claim Amount	Asserted Priority	
1	Red 1000 LLC	3386	\$590,529.03	Administrative (\$23,286.35) General Unsecured (\$567,242.68)	4181	\$973,047.85	Administrative (\$29,238.45) ¹ General Unsecured (\$943,809.40)	Claim number 3386 was amended and superseded by Claim number 4181.
2	Salesforce, Inc.	675	\$2,238,416.64	Administrative (\$2,194,931.00) General Unsecured (\$43,485.64)	4164	\$2,238,416.64	Administrative (\$697,734.29) ² General Unsecured (\$1,540,682.35)	Claim number 675 was amended and superseded by Claim number 4164.
3	TomTom North America, Inc.	3021	\$692,941.31	Administrative (Unliquidated) 11 U.S.C. § 503(b)(9) Claim (\$12,472.94) General Unsecured (\$680,468.37)	4169	\$692,941.31	General Unsecured ³	Claim number 3021 was amended and superseded by Claim number 4169.
4	Ferrante Koberling Construction, Inc.	414	\$355,820.94	Secured	2094	\$355,820.94	General Unsecured ⁴	Claim number 414 was amended and superseded by Claim number 2094.

1. The administrative portion of Claim No. 4181 was fully resolved pursuant to the Stipulation filed at D.I. 816.
2. The administrative portion of Claim No. 4164 was fully resolved pursuant to the Stipulation filed at D.I. 818.
3. Claim No. 4169 was reclassified pursuant to the Order filed at D.I. 1146.
4. Claim No. 2094 was reclassified pursuant to the Order filed at D.I. 1034.

Row	Claim #	Claimant	Asserted Total Claim Amount	Asserted Priority	Surviving Claim (If Any)	Reasons for Disallowance
1	795	Bollinger, Tim	\$7,471.95	Priority (\$1,000.00) General Unsecured (\$6,471.95)	Priority (\$1,000.00)	Claimant lists "Deposit on goods, stock" as the basis of the Claim in Box 8 of the applicable Proof of Claim form and asserts that the Claim is entitled to priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,000.00. The total amount of the Claim is \$7,471.95. Claim No. 795 does not contain any supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, \$6,471.95, as the amount of the Claim not attributed to the priority Claim under 11 U.S.C. § 507(a)(7), should be disallowed.
2	1540	Dusa, Raul	\$5,850.00	Priority (\$250.00) General Unsecured (\$5,600.00)	Priority (\$250.00)	Claimant lists "Purchase deposit and purchase of shares" as the basis of the Claim in Box 8 of the applicable Proof of Claim form and asserts that the Claim is entitled to priority under 11 U.S.C. § 507(a)(7) in the amount of \$250.00. Claim No. 1540 attaches proof of stock ownership and Fisker order details. The total amount of the Claim is \$5,850.00. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, \$5,600.00, as the amount of the Claim not attributed to the priority Claim under 11 U.S.C. § 507(a)(7), should be disallowed.

3	4219	Kumaresan, Bhuvaneswari	\$10,641.00	11 U.S.C. § 503(b)(9) Claim (\$2,000.00) Priority (\$10,641)	Disallowed in full.	Claimant lists "Money lost" as the basis of the Claim in Box 8 of the applicable Proof of Claim form, and attaches only investment account statements establishing proof of Fisker stock ownership. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
4	1006	Needham, Mark	\$1,550.00	Priority (\$250.00) General Unsecured (\$1,300.00)	Priority (\$250.00)	Claimant lists "Deposit on Vehicle and Stock Purchase" as the basis of the Claim in Box 8 of the applicable Proof of Claim form and asserts that the Claim is entitled to priority under 11 U.S.C. § 507(a)(7) in the amount of \$250.00. The total amount of the Claim is \$1,550.00. Claim No. 1006 attaches proof of stock ownership and a Fisker receipt. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, \$1,300.00, as the amount of the Claim not attributed to the priority Claim under 11 U.S.C. § 507(a)(7), should be disallowed.
5	4261	Roy, Ranajit	\$2,135.00	Secured (\$2,135.00)	Disallowed in full.	Claimant lists "I own 134 shares through IG trading." as the basis of the Claim in Box 8 of the applicable Proof of Claim form and attaches only confirmation of Fisker share orders. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.

6	1257	Schweitzer, Eric	\$75,000.00	Priority (\$15,150.00) General Unsecured (\$59,850.00)	Disallowed in full.	Claimant lists "RSU grant as part of compensation" as the basis of the Claim in Box 8 of the applicable Proof of Claim form, and attaches only an employment agreement that grants Restricted Stock Units subject to multiple vesting dates. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
7	4123	Stanton, Ann Marie	\$25,358.66	Priority (\$25,500.00)	Disallowed in full.	Claimant lists "Stocks" as the basis of the Claim in Box 8 of the applicable Proof of Claim form, and attaches only proof of Fisker stock ownership. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.
8	4250	Whitmer, Therese	\$810.66	Secured (\$810.66) Priority (\$810.66) 11 U.S.C. § 503(b)(9) Claim (\$810.66)	Disallowed in full.	Claimant lists "I lost money in the fisher stock" as the basis of Claim in Box 8 of the applicable Proof of Claim form, and does not attach any supporting documentation. The ownership of an equity security in any debtor entity is not a "Claim" within the meaning of 11 U.S.C. § 101(5). Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. Therefore, the Claim should be disallowed in full.