

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

In re: FISKER INC., et al., Debtors. Chapter 11 | Case No. 24-11390 (TMH)

**RESPONSE TO LIQUIDATING TRUSTEE'S OMNIBUS OBJECTION TO CLAIM NO.
1925**

Mhisani Miller (the "Claimant"), acting pro se, hereby responds to the Liquidating Trustee's Omnibus Objection to the Claimant's Proof of Claim. In support, the Claimant states:

1. **Validity of Claim:** Claimant Mhisani Miller filed a timely Proof of Claim, assigned **Claim No. 1925**, in the amount of **\$56,915.78**.
2. **Rebuttal of "No Liability":** The Trustee asserts that the Debtors' books and records do not reflect this liability. The Claimant asserts that any absence of this debt in Fisker's records is an accounting error on the part of the Debtors and does not invalidate the **\$56,915.78** legal obligation owed to the Claimant.
3. **Evidence of Claim:** Contrary to the Trustee's assertion of "insufficient documentation," the Claimant is attaching as **Exhibit A** evidence of the valid debt—including copies of the purchase agreement and payment records—which clearly shows the total claim amount of **\$56,915.78**.
4. **Prima Facie Evidence:** The documentation provided herewith constitutes *prima facie* evidence of the validity and amount of the claim under Federal Rule of Bankruptcy Procedure 3001(f).

WHEREFORE, the Claimant respectfully requests that the Court overrule the Trustee's objection and allow Claim No. **1925** in the amount of **\$56,915.78**.

Dated: **December 18, 2025**

Respectfully submitted,



Mhisani Miller 5860 Midnight Place, Unit A Dublin, California 94568 Phone: 510-207-1628



24113902512230000000000001

FISKER **Purchase Order**

Seller's name: Fisker Group Inc
 Address: 1888 Rosecrans Ave
 City: Manhattan Beach

Email:
 FiskerVehicleAdmin@fiskerinc.com
 Zip: 90266

Purchaser's Name: Mhisani Miller
 Address: 5860 Midnight Place
 City/State: Dublin, CA

Telephone*: +15102071628
 Email: m3slegacy@yahoo.com
 Zip: 94568

Co-Purchaser's Name:
 Address:
 City/State:

Telephone*:
 Email:
 Zip:

VEHICLE BEING SOLD

Stock No: Year: 2023 Make: FISKER Model: Ocean Trim: One Vin: VCF1ZBU28PG003294

Ref #: 00273
 Odometer: 4

OPTIONS

Expanding Cargo Organizer

VEHICLE PRICE

\$68,999.00

A processing fee is not an official fee. A processing fee is not required by law, but may be charged to buyers for handling documents and performing services related to the closing of a sale. A processing fee may not exceed \$85 for a motor vehicle contract or a reasonable amount agreed to by the parties for a heavy commercial vehicle contract. This notice is required by law. Your signature acknowledges Fisker's current Odometer Disclosure on the complying Title. Title and Registration fee estimates may change upon actual date of transfer.

TRADE-IN INFORMATION (if applicable)

Year: Make: Stock No:
 VIN: Model:
 License Plate: Mileage:
 Lienholder:
 Address:
 Telephone*:
 Lien/Payoff amount: Payoff amount good until:

Total cash price	\$68,999.00
Unpaid Balance	\$68,999.00
State sales tax	\$7,322.00
Title and Registration fee	\$791.00
Destination & Handling fee	\$2,438.00
Processing fee	\$85.00
Sub-total	\$79,635.00
Reservation and Order fees paid	\$5,250.00
Total due	\$74,385.00

Purchaser represents and warrants with regard to any trade-in:

initial As the seller, you hereby sell, transfer, and convey all rights, title, and interest in and to the vehicle to Fisker, and future assignors designated by Fisker. In consideration of the sale of the vehicle to Fisker the seller enters into an agreement for the amount displayed, which represents the full Value of the Vehicle.

initial You hereby represent and warrant to us that you are the sole legal and record owner of the Vehicle, and that no other party has any interest in or to the Vehicle unless disclosed as Lienholder above. You agree that you are responsible for any negative equity in connection with vehicle payoff. Funds may be utilized from financing with the new Fisker to cover any negative equity. Seller represents and warrants that the odometer of the Vehicle reflects the actual mileage, unless noted below.

Amount of Mileage in excess of Mechanical limits

initial

IS NOT actual mileage or there is an odometer discrepancy

initial

Your signature acknowledges and agrees that the Fisker Ocean One Preorder Agreement Terms and Conditions Addendum and all documents referenced therein are incorporated into this Purchase Order and complete the terms of sale.

PURCHASER *Mhisani Miller*
 Mhisani Miller (Oct 3, 2023 13:19 PDT)
 SELLER *Danish Ahmed*

CO PURCHASER _____
 TITLE Sr VP, Global Marketing, Sales & Service

Date 10/03/2023

Date _____

*Fisker FinanceSM customers: you will receive a text at this number to facilitate signing your loan documents. Message and data rates may apply.







Signing Ceremony - Mhisani Miller

Final Audit Report

2023-10-03

Created:	2023-10-03
By:	Lavar Wilson (lawilson@fiskerinc.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA8Nx_7jf-2K_vAXZsCTU5fYI7JOnRnU15

"Signing Ceremony - Mhisani Miller" History

-  Document created by Lavar Wilson (lawilson@fiskerinc.com)
2023-10-03 - 7:53:02 PM GMT
-  Document emailed to m3slegacy@yahoo.com for signature
2023-10-03 - 7:54:02 PM GMT
-  Email viewed by m3slegacy@yahoo.com
2023-10-03 - 7:57:41 PM GMT
-  Signer m3slegacy@yahoo.com entered name at signing as Mhisani Miller
2023-10-03 - 8:19:57 PM GMT
-  Document e-signed by Mhisani Miller (m3slegacy@yahoo.com)
Signature Date: 2023-10-03 - 8:19:59 PM GMT - Time Source: server
-  Agreement completed.
2023-10-03 - 8:19:59 PM GMT



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Acrobat Sign



Wiring Instructions

Account Name: Fisker Group Inc.
Account Number: 901658333
Routing Number: 021000021
SWIFT Code: CHASUS33
Bank: JPMorgan Chase New York, NY 10017
Reference: Please reference your OC# OC-V9474



P.O. Box 7629
Long Beach, CA 90807-0629
866.445.9828

Member Statement

Account Number [REDACTED]
Statement Period 06/01/2024 - 06/30/2024
Mail Code 6
Page 1 of 2

0000298-0000697 PDF 001 ----- 665340 88Y1



MHISANI MILLER
5860 MIDNIGHT PLACE A
DUBLIN CA 94568

Account Balances at a Glance

Total Checking: \$0.07
Total Savings: \$257.26
Total Loans: \$0.00

YOU'RE PRE-APPROVED FOR AN AUTO LOAN!

Rate:

5.74%
APR¹

New Auto up to 60 months²

Loan Amount:

\$70,000

Call 866.445.9828 to Accept Your Offer Today!

¹APR=Annual Percentage Rate. ²5.74% APR is valid for new autos up to 60 months.
*Finance charges will continue to accrue during 90 day payment deferral period.
Restrictions may apply. Offer expires 9/30/24. Contact us for details.

PLUS, MAKE NO
PAYMENTS FOR 90 DAYS!³

0050 CHECKING

Date	Description	Amount	Balance
06/01	Previous Balance		0.07
06/30	Closing Balance		0.07
		Period to Date	Year to Date
	Total Interest	0.00	0.72
	Total Overdraft Fees	0.00	0.00
	Total Return Item Fees	0.00	0.00

0000 REGULAR SHARE

Date	Description	Amount	Balance
06/01	Previous Balance		5.00
06/06	Deposit ACH PACIFIC MARITIME TYPE: PAYROLL AMT: 220.00 CO: PACIFIC MARITIME ACH Trace Number: 111000023267735	220.00	225.00
06/14	Deposit by Check	2,446.87	2,671.87
06/17	Withdrawal Adv Plus Banking A2A payment	-2,500.00	171.87
06/17	Deposit by Check	85.08	256.95
06/30	Deposit Dividend MONTHLY DIVIDEND Based on the whole daily balance: \$2,441.41	0.31	257.26
06/30	Closing Balance		257.26
	Dividend rate of 0.050% as of 06/30/24		
		Period to Date	Year to Date
	Total Interest	0.31	0.50
	Total Overdraft Fees	0.00	0.00
	Total Return Item Fees	0.00	0.00

Member Statement

Account Number: [REDACTED]

Statement Period: 06/01/2024 - 06/30/2024

Page 2 of 2

0001 2023 FISHER OCEAN					
Date	Description	Amount	Finance Charge	Late Charge	Balance
06/01	Previous Balance				56,915.78
06/05	Payments	-2,495.00	102.73		54,523.51
06/05	Additional Principal \$756.26 PAYTRACE PMT 2495.00 +5.00 00049A				
06/14	Payments by Check	-54,597.32	73.81		0.00
06/14	0001 2023 FISHER OCEAN This loan is now closed. Please retain this statement for your records. *** Please retain this final statement for tax reporting purposes *** Annual Percentage Rate 5.490% Daily Periodic Rate .015041% Year to Date Interest Year to Date Insurance and Late Charges	1,465.50 0.00			

For questions about your statement or your account please call Member Services at **866.4ILWUCU (866.445.9828)**.

In Case of Errors or Questions About Your Electronic Transfers call us at 866.445.9828 or write us at 3447 Atlantic Avenue, Long Beach, CA 90807, as soon as you can, if you think your statement or receipt is wrong or if you need more information about a transfer on the statement or receipt. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared.

- (1) Tell us your name and account number (if any).
- (2) Describe the error or the transfer you are unsure about and explain as clearly as you can why you believe it is an error or why you need more information.
- (3) Tell us the dollar amount of the suspected error.

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days to do this, we will credit your account for the amount you think is in error, so that you will have the use of the money during the time it takes us to complete our investigation.

Please complete the form that you can access using the link below to report any errors or discrepancies on your account which have not been resolved to your satisfaction by the ILWU Credit Union staff to the Supervisory Committee. Do not use this form to submit general member inquiries to the Credit Union.

<https://ilwucu.formyfi.com/contact-form>

CERTIFICATE OF SERVICE

I, Mhisani Miller, certify that on this 18th day of December, 2025, I caused a copy of the foregoing Response and Exhibit A to be served via Federal Express (FedEx) upon the following parties:

Clerk of the Court
824 N. Market Street, 3rd Floor
Wilmington, DE 19801

ASK LLP
Attn: Brigitte G. McGrath
60 East 42nd Street, 46th Floor
New York, NY 10165

Respectfully,


Mhisani Miller

RECEIVED
2025 DEC 22 P 1:16
CLERK
U.S. DISTRICT COURT
DISTRICT OF DELAWARE