IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
FISKER, INC., *et al.*,[1]	Case No. 24-11390 (TMH)
Debtors.	(Jointly Administered)
	Hearing Date: July 14, 2026 at 11:00 a.m. (ET) **Objection Deadline: June 30, 2026 at 4:00 p.m. (ET)**

LIQUIDATING TRUSTEE'S NINETEENTH 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 P. 3007 AND LOCAL RULE 3007-1 TO CERTAIN (I) AMENDED AND SUPERSEDED CLAIMS; (II) SAME-DEBTOR DUPLICATE CLAIMS; AND (II) EQUITY CLAIMS

*****CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON SCHEDULE 1, SCHEDULE 2 AND SCHEDULE 3 TO THE PROPOSED ORDER *****

Matthew Dundon, solely in his capacity as the Liquidating Trustee (the "**Liquidating Trustee**") of the Fisker Liquidating Trust (the "**Liquidating Trust**"), hereby submits this nineteenth omnibus objection (the "**Objection**") seeking entry of an order (the "**Proposed Order**"), substantially in the form annexed hereto as **Exhibit A**, pursuant to section 502 of title 11 of the United States Code (the "**Bankruptcy Code**"), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), and Rule 3007-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "**Local Rules**"): (i) disallowing in full and expunging the amended and superseded Proofs of Claim[2] listed on **Schedule 1** to the Proposed Order (the "**Amended/Superseded Claims**"); (ii) disallowing in full and expunging the

[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' former 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 Plan (as defined below).

same-Debtor duplicate Proofs of Claim listed on **Schedule 2** to the Proposed Order (the "**Same-Debtor Duplicate Claims**"); and (iii) disallowing in part, or disallowing in full and expunging, as applicable, each Proof of Claim identified on **Schedule 3** to the Proposed Order because each such Proof of Claim is based upon, either in whole or in part, ownership of shareholder/equity security interests and/or stock in the Debtors (the "**Equity Claims**" and, together with the Amended/Superseded Claims and the Same-Debtor Duplicate Claims, the "**Disputed Claims**"). In support of the Objection, the Liquidating Trustee submits the Declaration of Rick Wright (the "**Wright Declaration**," a copy of which is attached hereto as **Exhibit B** and incorporated by reference herein), and respectively represents as follows:

JURISDICTION, VENUE AND BASES FOR RELIEF

1. The United States District Court for the District of Delaware has jurisdiction over this Motion pursuant to 28 U.S.C. § 1334, which was referred to the United States Bankruptcy Court for the District of Delaware (the "**Court**") under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012.

2. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2), and the Court may enter a final order consistent with Article III of the United States Constitution.[3]

3. The statutory bases for the relief requested herein are Bankruptcy Code section 502, Bankruptcy Rule 3007, and Local Rule 3007-1. The Plan, the Confirmation Order and the Claim Objection Procedures provide additional bases for the relief sought.

[3] Pursuant to Local Rule 9013-1(f), the Liquidating Trustee hereby confirms his consent to entry of a final order by the Court in connection with this Objection if it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

BACKGROUND

A. The Chapter 11 Cases

4. On June 17 and 19, 2024, as applicable (the "**Petition Date**"), Fisker, Inc. and its debtor affiliates (the "**Debtors**") commenced the above-captioned cases (the "**Chapter 11 Cases**") in the Court under chapter 11 of the Bankruptcy Code.

5. On October 15, 2024, the Debtors filed their fourth amended *Combined Disclosure Statement and Chapter 11 Plan of Liquidation of Fisker Inc. and its Debtor Affiliates* (as amended, the "**Plan**") [D.I. 713].

6. On October 16, 2024, the Court entered the *Findings of Fact, Conclusions of Law, and Order, Approving the Disclosure Statement on a Final Basis, Confirming the Debtors' Joint Chapter 11 Plan of Liquidation, and Granting Related Relief* (the "**Confirmation Order**") [D.I. 722] confirming the Plan.

7. Pursuant to the Confirmation Order, the appointment of the Liquidating Trustee was approved in all respects, including:

> [T]o (a) carry out all rights and duties set forth in the Plan and Liquidating Trust Agreement, (b) appear and be heard on all matters related to the Chapter 11 Cases (as a representative of the Liquidating Trust and/or the Debtors, as applicable), (c) as set forth in Article VIII.B.3 of the Plan and this Order, investigate, prosecute and resolve, in the name of the Debtors and/or the name of the Liquidating Trustee, any Preserved Estate Claims (including, for the avoidance of doubt, any criminal causes of action), and (d) present to creditors and other courts of competent jurisdiction this Order as evidence of such authority.

See Confirmation Order ¶ 73.

8. On October 17, 2024 (the "**Effective Date**"), the Plan went effective. *See Notice of (I) Effective Date of Combined Disclosure Statement and Chapter 11 Plan of Liquidation of Fisker Inc. and its Debtor Affiliates and (II) Certain Claims Bar Dates* [D.I. 730].

9. The Liquidating Trust was established on the Effective Date, into which the Debtors transferred "all of the Debtors' and Estates' rights, title, and interest in and to all of the Liquidating Trust Assets, and, in accordance with section 1141 of the Bankruptcy Code, the Liquidating Trust Assets, … automatically vest[ed] in the Liquidating Trust free and clear of all Claims, Liens, encumbrances, or interests." *See* Confirmation Order, ¶ 75.

10. The Plan provides that, after the Effective Date, the Liquidating Trustee: "[s]hall have the sole authority to (a) file, withdraw or litigate to judgment, objections to Claims; (b) settle or compromise any Disputed Claim without any further notice to or action, order or approval by the Bankruptcy Court (other than a Professional Fee Claim)." *See* Plan, Article X.B.

B. The Bar Dates

11. On August 15 and 16, 2024, each Debtor filed its respective schedule of assets and liabilities and statement of financial affairs, as each may have been amended from time to time [D.I. 430-450].

12. On August 19, 2024, the Court entered its *Order (I) Establishing Certain Bar Dates for Filing Proofs of Claim Against the Debtors, and (II) Granting Related Relief, Including Notice and Filing Procedures* [D.I. 458] (the "**Bar Date Order**").

13. Among other things, the Bar Date Order established (i) 5:00 p.m. prevailing Eastern Time on September 11, 2024 (the "**General Bar Date**") as the deadline for all entities, other than governmental units, to file Proofs of Claim and (ii) 5:00 p.m. prevailing Eastern Time on December 16, 2024 (the "**Governmental Bar Date**") as the deadline for governmental units to file Proofs of Claim.

14. On August 21, 2024, the Liquidating Trust's (and formerly, the Debtors') claims and noticing agent, Kurtzman Carson Consultants, LLC dba Verita Global caused the *Notice of*

Bar Dates for Filing Proofs of Claim Against the Debtors substantially in the form attached as **Exhibit 2** to D.I. 458 (the "**Notice of Bar Dates**") to be served via first-class mail upon each claimant at their last known address on file, along with a Modified Official Form 410 Proof of Claim, substantially in the form attached at **Exhibit 1** to D.I. 458, customized for each individual claimant. *See Certificate of Service of Scott M. Ewing re: 1) Modified Official Form 410 Proof of Claim; and 2) Notice of Bar Dates for Filing Proofs of Claim Against the Debtors* [D.I. 495].

15. The Notice of Bar Dates provides as follows:

> On August 19, 2024, the Court entered an order … establishing the following deadlines for filing certain prepetition claims … in the Debtors' Chapter 11 Cases: (a) **September 11, 2024, 5:00 p.m. prevailing Eastern Time** as the deadline (the "**General Bar Date**") to file a proof of claim in respect of any prepetition claim against any of the Debtors, including, without limitation, any secured claim, unsecured claim, priority claim, or claim asserted under section 503(b)(9) of the Bankruptcy Code for goods delivered and received by any of the Debtors within twenty (20) days before the Petition Date, unless otherwise provided in the Bar Date Order.

See Notice of Bar Dates.

C. Administrative Claims Bar Date

16. Under the Plan, holders of Administrative Claims were required to file such Claims no later than the first Business Day that was thirty (30) days following the Effective Date, or November 18, 2024 (the "**Administrative Claims Bar Date**" and, together with the General Bar Date and the Governmental Bar Date, the "**Bar Dates**"). *See* Plan, Articles I.A.15, V.A.1.

17. The Confirmation Order provides that "[e]xcept as otherwise provided in the Plan or this Order, requests for payment of Administrative Claims must be filed no later than the Administrative Claims Bar Date in accordance with the Plan." *See* Confirmation Order ¶ 101.

18. Consequently, all applicable Bar Dates have passed.

C. Claim Objection Deadlines

19. Pursuant to the *Order Further Extending the Time Period Within Which the Liquidating Trustee May File and Serve Objections to Claims and Interests* [D.I. 1228], the deadline for the Liquidating Trustee to object to any and all Claims and Interests, including but not limited to prepetition Claims and Interests and Administrative Claims, is August 17, 2026, subject to the Liquidating Trustee's right to seek additional extensions.

D. Claim Objection Procedures

20. In connection with the Claim reconciliation process, the Liquidating Trustee previously obtained approval of certain omnibus objection procedures intended to promote a reconciliation process that is conducted in a timely, efficient, and cost-effective manner (the "**Claim Objection Procedures**"). *See Order Granting Liquidating Trustee's Motion (I) Leave from Local Rule 3007-1(f) Related to the Filings of Substantive Omnibus Claim Objections; and (II) Related Relief* [D.I. 894].

21. Among other things, the Claims Objection Procedures provide the Liquidating Trustee with relief from certain of the requirements of the Local Rules to permit (but not require) the Liquidating Trustee to exceed certain claims limits and file omnibus Claim objections raising common legal issues to multiple Claims.

E. The Claim Reconciliation Process

22. In the ordinary course of business, the Debtors maintained books and records (the "**Books and Records**") that reflect, *inter alia*, the Debtors' liabilities and the amounts owed to their creditors.

23. Since the Effective Date, the Liquidating Trustee and his advisors (the "**Reviewing Parties**") have undertaken a comprehensive review of all Proofs of Claim filed in these Chapter 11 Cases, including any supporting documentation and a comparison of these documents with the

Books and Records to determine the validity of such Proofs of Claim. *See* Wright Declaration ¶ 4. This process is ongoing and includes identifying categories of Claims that may be targeted for disallowance and expungement, reduction and/or reclassification. *See id.*

24. In that regard, the Liquidating Trustee has successfully prosecuted numerous omnibus objections to Claims. *See, e.g.*, D.I. 888, 889, 890, 910, 930, 956, 976, 977, 1054, 1055, 1097, 1131, 1171, 1173, 1185, 1212, 1255, 1268. In addition to, and as part of, the formal Claim reconciliation process, the Liquidating Trustee continues to resolve certain outstanding Claims through stipulated withdrawals, settlements and/or consensual reconciliations.

25. While the Liquidating Trustee has made significant progress in the Claim reconciliation process, additional objections are required to resolve many as-yet unreconciled Proofs of Claim. To reduce the number of Claims, and to avoid possible double or otherwise improper recovery by claimants, the Liquidating Trustee will continue to file additional objections (both omnibus objections and standalone objections, as applicable) to Proofs of Claim on a rolling basis.

26. The Reviewing Parties have reviewed the Disputed Claims and the Liquidating Trustee has determined that such Claims are objectionable on non-substantive grounds and should be disallowed and expunged in full, or disallowed in part, as applicable, because such Proofs of Claim are Amended/Superseded Claims, Same-Debtor Duplicate Claims or Equity Claims.[4] *See* Wright Declaration ¶ 5.

[4] This Objection is expressly without prejudice to any and all rights of the Liquidating Trustee to bring future and/or additional objections to any of the Disputed Claims on any basis if applicable.

RELIEF REQUESTED

27. By this Objection and for the reasons described more fully herein, the Liquidating Trustee objects to the Disputed Claims set forth on **Schedule 1**, **Schedule 2** and **Schedule 3** to the Proposed Order. The Liquidating Trustee respectfully requests entry of the Proposed Order: (i) disallowing in full and expunging the Amended/Superseded Claims; (ii) disallowing in full and expunging the Same-Debtor Duplicate Claims; and (ii) disallowing in full and expunging, or disallowing in part, as applicable, the Equity Claims.

BASIS FOR RELIEF

28. Bankruptcy Code section 502(a) provides, in pertinent part, as follows: "[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest . . . objects." 11 U.S.C. § 502(a). Further, Bankruptcy Code section 502(b)(1) provides that a court "shall determine the amount of such claim . . . as of the date of the filing of the petition, and shall allow such claim in such amount, except to the extent that—such claim is unenforceable against the debtor and the property of the debtor . . . ." *See* 11 U.S.C. § 502(b)(1).

29. The burden of proof for determining the validity of claims rests on different parties at different stages of the objection process. As explained by United States Court of Appeals for the Third Circuit:

> The burden of proof for claims brought in bankruptcy court under 11 U.S.C. § 502(a) rests on different parties at different times. Initially, the claimant must allege facts sufficient to support the claim. If the averments in his filed claim meet this standard of sufficiency, it is 'prima facie' valid. [citations omitted]. In other words, a claim that alleges facts sufficient to support legal liability to the claimant satisfies the claimants' initial obligation to go forward. The burden of going forward then shifts to the objector to produce evidence sufficient to negate the prima facie validity of the filed claim . . . In practice, the objector must produce evidence

> which, if believed, would refute at least one of the allegations that is essential to the claim's legal sufficiency. If the objector produces sufficient evidence to negate one or more of the sworn facts in the proof of claim, the burden reverts to the claimant to prove the validity of the claim by a preponderance of the evidence.

In re Allegheny Int'l Inc., 954 F.2d 167, 173-74 (3d Cir. 1992) (citation omitted).

30. Once the *prima facie* validity of a claim is rebutted, "it is for the claimant to prove his claim, not for the objector to disprove it." *In re Kahn*, 114 B.R. 40, 44 (Bankr. S.D.N.Y. 1990) (citations omitted).

31. Pursuant to Bankruptcy Rule 3007(d), a debtor is permitted to file omnibus objections to more than one claim on the bases enumerated therein, which include, among other things, that such claims "were not timely filed." *See* Fed. R. Bankr. P. 3007(d)(4).

32. Additionally, Local Rule 3007-1 governs omnibus objections to Claims in this District and "applies to an omnibus objection to claims (*i.e.*, an objection that objects to claims filed by different claimants)." *See* Del. Bankr. L.R. 3007-1(a).

33. Further, Local Rule 3007-1(c) provides that "[a]n omnibus objection is deemed to be made on a substantive basis unless it is based on the following: … (i) Duplicate claim; … (iii) Amended or superseded claim; …. (v) Stockholder claim based on stock ownership, but not a stockholder claim for damages." *See* Del. Bankr. L.R. 3007-1(c)(i), (iii), (v).

34. For the reasons set forth below, there is ample evidence to rebut the *prima facie* validity of each of the Disputed Claims.

A. <u>Amended/Superseded Claims</u>

35. The Third Circuit has held that in the absence of prejudice, bankruptcy courts should allow amendments to proofs of claim to cure a defect in a claim as filed or to describe the claim with greater particularity. *See In re Edison Bros. Stores*, 2002 Bankr. LEXIS 1228 at * 10

(Bankr. D. Del. May 15, 2002) (stating that amendments are to be allowed where the original claim prompted notice to the court of the existence, nature, and amount of the claim, and are not allowed when they constitute the assertion of an entirely new claim). Amendments relate back to the date of the filing of the original claim. *See In re Metro Transp. Co.*, 117 B.R. 143, 147 (Bankr. E.D. Pa. 1990).

36. The Reviewing Parties have reviewed the Proofs of Claim listed on **Schedule 1** to the Proposed Order and the Liquidating Trustee has determined that such Proofs of Claim have been amended and superseded by a later-filed Proof of Claim, filed by the same claimant asserting a Proof of Claim for the same liability (each, a "**Surviving Claim**"). *See* Wright Declaration ¶ _6.

37. Unless the Amended/Superseded Claims are disallowed, the claimants listed on **Schedule 1** to the Proposed Order could receive a duplicative recovery from the Debtors' estates. *See* Wright Declaration ¶ _7.

38. Moreover, the claimants affected by the Objection will not be prejudiced if the Amended/Superseded Claims are disallowed in full and expunged because each such claimant will retain the corresponding Surviving Claim that is identified on **Schedule 1** to the Proposed Order. *See* Wright Declaration ¶ 8.

39. Accordingly, the Liquidating Trustee seeks entry of the Proposed Order disallowing in full and expunging each of the Amended/Superseded Claims listed on **Schedule 1** to the Proposed Order. *See* Wright Declaration ¶ _9.

B. Same-Debtor Duplicate Claims

40. The Liquidating Trustee has determined that the Proofs of Claim identified as Same-Debtor Duplicate Claims on **Schedule 2** to the Proposed Order are identical to other Proofs of Claim filed by the same claimant asserting a Claim for the same liability, in the same amount

and priority, and against the same debtor, and therefore must be disallowed in full and expunged. *See* Wright Declaration ¶ 10.

41. Notably, such claimants will not be prejudiced if the Same-Debtor Duplicate Claims are disallowed in full and expunged, because such claimants will retain their respective remaining claims (each, a "**Remaining Claim**"), also identified on **Schedule 1** to the Proposed Order. *See* Wright Declaration ¶ 11.

42. Accordingly, the Liquidating Trustee seeks entry of the Proposed Order disallowing in full and expunging each of the Same-Debtor Duplicate Claims listed on **Schedule 2** to the Proposed Order. *See* Wright Declaration ¶ 12.

C. Equity Claims

43. The Equity Claims identified on **Schedule 3** to the Proposed Order were filed by claimants asserting rights to a distribution in the Chapter 11 Cases based, in whole or in part, upon ownership of Equity Interests in the Debtors. *See* Wright Declaration ¶ 13.

44. An equity interest in a debtor, such as stock, is not considered a "claim" under the Bankruptcy Code. *See* 11 U.S.C. § 101(5)(A) (defining a "claim" as a "right to payment" or a "right to an equitable remedy for a breach of performance"); *see also In re Insilco Techs., Inc.*, 480 F.3d 212, 218 (3d Cir. 2007) ("[An equity interest] is not a claim at all"); *In re Hedged-Invs. Assocs.*, 84 F.3d 1267, 1272 (10th Cir. 1996) ("Simply put, an equity interest is not a claim against the debtor… . ") (quotations omitted).

45. Moreover, consistent with Local Rule 3007-1(c)(v), each portion of the Proofs of Claim listed on **Schedule 3** to the Proposed Order (or the entire Proof of Claim, as applicable) that assert ownership of Equity Interests do not allege damages associated therewith. *See* Wright Declaration ¶ 13.

46. Further, pursuant to the Plan, all Class 6 equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and are not entitled to receive a recovery under the Plan. *See* Plan, Article VI.B.6; *see also* Wright Declaration ¶ 15.

47. The allowance of such Equity Claims would unjustifiably elevate the position of equity security holders to that of creditors, to the detriment of legitimate creditors in the Chapter 11 Cases. *See* Wright Declaration ¶ 16.

48. Accordingly, the Liquidating Trustee objects to the Equity Claims, and requests entry of the Proposed Order addressing each of the Equity Claims in the manner set forth on **Schedule 3** to the Proposed Order. *See* Wright Declaration ¶ 17.

RESPONSES TO OMNIBUS OBJECTIONS

49. To contest this Objection, holders of the Disputed Claims must file and serve a written response (a "**Response**") so that it is received no later than June 30, 2026 at 4:00 p.m. (Eastern Time) (the "**Response Deadline**"). The Response must be filed with the Office of the Clerk of the United States Bankruptcy Court for the District of Delaware: 824 North Market Street, Wilmington, Delaware 19801, and served upon co-counsel to the Liquidating Trustee, so that the Response is received no later than the Response Deadline, at the undersigned addresses for counsel to the Liquidating Trustee.

50. Every Response to this Objection must contain, at a minimum, the following information:

i. a caption setting forth the name of the Court, the name of the Debtors, the case number, and the title of the objection to which the response is directed;

ii. the name of the claimant, his/her/its Proof of Claim number, and a description of the basis of the Proof of Claim;

iii. the specific factual basis and supporting legal argument upon which the party will rely in opposing this Objection;

iv. any supporting documentation, to the extent it was not included with the Proof of Claim, previously filed with the clerk or claims agent, upon which the party will rely to support the basis for and amounts asserted in the Proof of Claim; and

v. the name, address, telephone number, email address and fax number of the persons (which may be the claimant or the claimant's legal representative) with whom counsel for the Liquidating Trustee should communicate with respect to the Proof of Claim and/or the Objection and who possesses authority to reconcile, settle, or otherwise resolve the Objection to the Disputed Claims on behalf of the claimant.

51. If a claimant fails to file and serve a timely Response by the Response Deadline, the Liquidating Trustee will present to the Court an appropriate order disallowing in full and expunging, or disallowing in part, as applicable, the Disputed Claims without further notice to the claimant.

REPLIES TO RESPONSES

52. Consistent with Local Rule 9006-1(d), the Liquidating Trustee may, at his option, file and serve a reply to a Response no later than 4:00 p.m. (Prevailing Eastern Time) one (1) day prior to the deadline for filing the agenda for any hearing to consider the Objection.

SEPARATE CONTESTED MATTERS

53. Each of the above objections to the Disputed Claims constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. The Liquidating Trustee requests that any order entered by this Court with respect to an objection asserted in this Objection shall be deemed a separate order with respect to each Proof of Claim.

RESERVATION OF RIGHTS

54. The Liquidating Trustee expressly reserves the right to amend, modify or supplement this Objection and 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. Should one or more of the grounds of objection stated in this Objection be dismissed, the

Liquidating Trustee reserve his rights to object on other stated grounds or on any other grounds that the Liquidating Trustee discovers during the pendency of these Chapter 11 Cases.

NOTICE

55. Notice of this Objection has been provided via first-class mail and e-mail (if available) to (i) the Office of the United States Trustee for the District of Delaware; (ii) all the Claimants listed on **Schedule 1**, **Schedule 2** and **Schedule 3** to the Proposed Order or their counsel, if known; and (iii) any persons who have filed a request for notice in these Chapter 11 Cases pursuant to Bankruptcy Rule 2002.

STATEMENT OF COMPLIANCE WITH LOCAL RULE 3007-1

56. The undersigned representative of Cole Schotz P.C. ("**Cole Schotz**") certifies that he has reviewed the requirements of Local Rule 3007-1 and that the Objection substantially complies with that Local Rule. To the extent that the Objection does not comply in all respects with the requirements of Local Rule 3007-1, Cole Schotz asserts that such deviations are not material and respectfully requests that any such requirement be waived.

CONCLUSION

57. Accordingly, the Liquidating Trustee respectfully requests that this Court: (i) enter the Proposed Order attached hereto as **Exhibit A**; and (ii) grant such other and further relief as is just and proper.

Dated: June 9, 2026
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Justin R. Alberto

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Co-Counsel to the Liquidating Trustee

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
FISKER, INC., *et al.*,[1]	Case No. 24-11390 (TMH)
Debtors.	(Jointly Administered)
	Hearing Date: July 14, 2026 at 11:00 a.m. (ET) **Objection Deadline: June 30, 2026 at 4:00 p.m. (ET)**

NOTICE OF LIQUIDATING TRUSTEE'S NINETEENTH 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; (II) SAME-DEBTOR DUPLICATE CLAIMS; AND (III) EQUITY CLAIMS

*****CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON SCHEDULE 1, SCHEDULE 2 AND SCHEDULE 3 TO THE PROPOSED ORDER**

PLEASE TAKE NOTICE, that on June 9, 2026, Matthew Dundon, solely in his capacity as the Liquidating Trustee (the "**Liquidating Trustee**") of the Fisker Liquidating Trust, filed the *Liquidating Trustee's Nineteenth 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; (II) Same-Debtor Duplicate Claims; and (III) Equity Claims* (the "**Objection**") with the United States Bankruptcy Court for the District of Delaware (the "**Court**"). A copy of the Objection is enclosed herein.

PLEASE TAKE FURTHER NOTICE, that responses, if any, to the Objection must be filed with the Clerk of the Court, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **June 30, 2026 at 4:00 p.m. (ET)** (the "**Response Deadline**"). At the same time, you must serve a copy of the response upon the undersigned counsel so as to be received on or before the Response Deadline.

PLEASE TAKE FURTHER NOTICE, that, if a response is timely filed and served, and such objection or response is not otherwise timely resolved, a hearing with respect to the Objection will be held before The Honorable Thomas M. Horan, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 5th Floor, Courtroom #5, Wilmington, Delaware 19801 on **July 14, 2026 at 11:00 a.m. (ET)** (the "**Hearing**").

[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' former corporate headquarters is 14 Centerpointe Drive, La Palma, CA 90623.

PLEASE TAKE FURTHER NOTICE THAT IF NO RESPONSE IS RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY ENTER THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: June 9, 2026
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Justin R. Alberto

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Co-Counsel to the Liquidating Trustee

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
FISKER, INC., *et al.*,[1]	Case No. 24-11390 (TMH)
Debtors.	(Jointly Administered)

DECLARATION OF RICK WRIGHT IN SUPPORT OF LIQUIDATING TRUSTEE'S NINETEENTH 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; (II) SAME-DEBTOR DUPLICATE CLAIMS; AND (III) EQUITY CLAIMS

I, Rick Wright, hereby declare under penalty of perjury:

1. I submit this declaration (the "**Declaration**") in support of the *Liquidating Trustee's Nineteenth 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; (II) Same-Debtor Duplicate Claims; and (III) Equity Claims* (the "**Objection**"),[2] filed by Matthew Dundon, solely in his capacity as the Liquidating Trustee (the "**Liquidating Trustee**") of the Fisker Liquidating Trust.

2. I am a Managing Director at Dundon Advisers. In that capacity, I work under the direction of the Liquidating Trustee. I am familiar with the Debtors' day-to-day operations, businesses, financial affairs, and Books and Records. I make this Declaration on the basis of the

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

review, by myself and those under my direction, of the Debtors' respective Books and Records, the register of claims (the "**Claims Register**") prepared and provided by the Debtors' (and the Liquidating Trust's) notice and claims agent, Kurtzman Carson Consultants dba Verita Global, and the Proofs of Claim filed in these Chapter 11 Cases.

3. All matters set forth in this Declaration are based on: (a) my personal knowledge; (b) my review of relevant documents; (c) my view, based on my experience and knowledge of the Debtors' operations and Books and Records; (d) information supplied to me by others at my request; and (e) as to matters involving United States bankruptcy law or rules or other applicable laws, my reliance on the advice of counsel or other advisors to the Liquidating Trustee. I have read the Objection, the Proposed Order, and **Schedule 1**, **Schedule 2** and **Schedule 3** attached to the Proposed Order, and I am familiar with the information contained therein.

4. Since the Effective Date, the Reviewing Parties have undertaken a comprehensive review of all Proofs of Claims filed in these Chapter 11 Cases, including any supporting documentation and a comparison of these documents with the Books and Records to determine the validity of such Proofs of Claim. This process includes identifying categories of Claims that may be targeted for disallowance and expungement, reduction and/or reclassification

5. In that regard, the Reviewing Parties have reviewed the Disputed Claims and the Liquidating Trustee has determined that such Proofs of Claim are objectionable on non-substantive grounds and should be disallowed and expunged in full, or disallowed in part, as applicable, because such Proofs of Claim are Amended/Superseded Claims, Same-Debtor Duplicate Claims or Equity Claims, as more fully set forth on the applicable schedules to the Proposed Order.

A. Amended/Superseded Claims

6. To the best of my knowledge, information and belief, and based on the information and the Books and Records available to me, each of the Amended/Superseded Claims identified on **Schedule 1** to the Proposed Order is superseded by the "Surviving Claim" indicated thereon and should be therefore disallowed and expunged.

7. To the best of my knowledge and belief, and based on the information and Books and Records available to me, failure to disallow in full and expunge the Amended/Superseded Claims could result in the applicable claimant receiving a duplicative recovery against the Debtors' estates, to the detriment of other stakeholders.

8. Moreover, to the best of my knowledge and belief, and based on the information and Books and Records available to me, the claimants affected by the Objection will not be prejudiced if the Amended/Superseded Claims are disallowed in full and expunged because each such claimant will retain the corresponding Surviving Claim that is identified on **Schedule 1** to the Proposed Order.

9. Accordingly, I believe that the Court should grant the relief requested in the Objection with respect to the Amended/Superseded Claims.

B. Same-Debtor Duplicate Claims

10. To the best of my knowledge, information and belief, and based on the information and the Books and Records available to me, the Proofs of Claim identified as Same-Debtor Duplicate Claims on **Schedule 2** to the Proposed Order are identical to other Proofs of Claim filed by the same claimant asserting a Claim for the same liability, in the same amount and priority, and against the same debtor, and therefore must be disallowed in full and expunged.

11. To the best of my knowledge, information and belief, and based on the information and the Books and Records available to me, the claimants will not be prejudiced if the Same-

Debtor Duplicate Claims are disallowed and expunged, because such claimants will retain their respective Remaining Claim, also identified on **Schedule 1** to the Proposed Order.

12. Accordingly, I believe that the Court should grant the relief requested in the Objection with respect to the Same-Debtor Duplicate Claims.

C. Equity Claims

13. To the best of my knowledge, information and belief, and based on the information and the Books and Records available to me, each of the Equity Claims identified on **Schedule 3** to the Proposed Order are based upon ownership of shareholder/equity interests and do not allege damages associated therewith.

14. Each of the Equity Claims identified on **Schedule 3** to the Proposed Order therefore do not constitute "claims" against any of the Debtors' estates within the meaning of section 101(5) of the Bankruptcy Code.

15. Further, pursuant to the Plan, all Class 6 equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and are not entitled to a recovery under the Plan.

16. To the best of my knowledge and belief, and based on the information and Books and Records available to me, if the Equity Claims are not disallowed and expunged, the potential exists for the applicable claimants to receive recoveries to which they are not entitled, to the detriment of other stakeholders.

17. Accordingly, I believe that the Court should grant the relief requested in the Objection with respect to the Equity Claims.

D. Conclusion

18. Accordingly, based upon my review of the Claims Register and the Books and Records, I believe that granting the relief requested in the Objection is in the best interest of the Liquidating Trust, the Debtors' estates and their creditors.

Dated: June 9, 2026

/s/ Rick Wright
Rick Wright

Exhibit A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
FISKER, INC., *et al.*,[1]	Case No. 24-11390 (TMH)
Debtors.	(Jointly Administered)
	Re: D.I. ___

ORDER GRANTING LIQUIDATING TRUSTEE'S NINETEENTH 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; (II) SAME-DEBTOR DUPLICATE CLAIMS; AND (III) EQUITY CLAIMS

THIS MATTER having come before the Court[2] upon the *Liquidating Trustee's Nineteenth 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; (II) Same-Debtor Duplicate Claims; and (III) Equity Claims* (the "**Objection**"), filed by Matthew Dundon, solely in his capacity as the Liquidating Trustee (the "**Liquidating Trustee**") of the Fisker Liquidating Trust (the "**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/Superseded Claims; (ii) disallowing in full and expunging the Same-Debtor Duplicate Claims; and (iii) disallowing in part, or disallowing in full and expunging, as applicable, the Equity Claims, each for the reasons set forth in the Objection; and it appearing that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §1334; and it appearing that this is a core proceeding pursuant to 28

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

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 Amended/Superseded Claims listed on **Schedule 1** hereto, the Same-Debtor Duplicate Claims listed on **Schedule 2** hereto, and the Equity Claims listed on **Schedule 3** hereto, 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: (i) an Amended/Superseded Claim listed on **Schedule 1** hereto; (ii) a Same-Debtor Duplicate Claim listed on **Schedule 2** attached hereto; and (iii) an Equity Claim listed on **Schedule 3** attached hereto was properly and timely served with a copy of the Objection, the Wright Declaration, this Order, the accompanying schedules of Amended/Superseded Claims, Same-Debtor Duplicate Claims, and Equity Claims, and the notice of the 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 Amended/Superseded Claims listed on **Schedule 1** hereto are hereby disallowed in full and expunged for all purposes.

4. Each of the Same-Debtor Duplicate Claims listed on **Schedule 2** hereto are hereby disallowed in full and expunged for all purposes.

5. Each of the Equity Claims listed on **Schedule 3** hereto are hereby disallowed in full and expunged for all purposes, or disallowed in part, as applicable.

6. 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.

7. The official Claims Register in these Chapter 11 Cases shall be modified in accordance with this Order.

8. 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 fully 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.

9. 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).

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

Schedule 1 - Amended and Superseded Claims

	Amended and Superseded Claim				Surviving Claim			
Row	Claimant	Claim #	Asserted Claim Amount	Asserted Priority	Claim #	Asserted Claim Amount	Asserted Priority	Basis for Proposed Disallowance
1	Ahmed, Irshad	316	$49,000.00	General Unsecured	1802	$14,296.00[1]	General Unsecured	Claim number 316 was amended and superseded by Claim number 1802.
2	Alpiger, Brian	254	$35,000.00[2]	General Unsecured	2555	$14,296.00[1]	General Unsecured	Claim number 254 was amended and superseded by Claim number 2555.
3	Asher, James	613	$30,000.00	General Unsecured	4116	$30,000.00	General Unsecured	Claim number 613 was amended and superseded by Claim number 4116.
4	Bajek, Arthur	1679	$30,000.00	General Unsecured	1704	$14,296.00[1]	General Unsecured	Claim number 1679 was amended and superseded by Claim number 1704.
5	Bakalian, Gerry	317	$30,000.00	General Unsecured	2282	$14,296.00[1]	General Unsecured	Claim number 317 was amended and superseded by Claim number 2282.
6	Bauer, Brad	517	$30,000.00	General Unsecured	519	$30,000.00	General Unsecured	Claim number 517 was amended and superseded by Claim number 519.
7	Bazargan, Alberto	3320	$71,437.00	General Unsecured	3531	$14,296.00[1]	General Unsecured	Claim number 3320 was amended and superseded by Claim number 3531.
8	Beckmann, Wesley	1106	$40,000.00	General Unsecured	1697	Undetermined	General Unsecured	Claim number 1106 was amended and superseded by Claim number 1697.
9	Beckmann, Wesley	1697	Undetermined	General Unsecured	4022	$40,000.00	General Unsecured	Claim number 1697 was amended and superseded by Claim number 4022.
10	Britt, Adrienna	3064	$35,000.00	General Unsecured	4243	$14,296.00[1]	General Unsecured	Claim number 3064 was amended and superseded by Claim number 4243.
11	Buzzard, Ryan	478	$78,111.00	General Unsecured	3535	$78,111.00	General Unsecured	Claim number 478 was amended and superseded by Claim number 3535.
12	Carley, Patrick	364	$30,000.00	General Unsecured	2109	$73,000.00	General Unsecured	Claim number 364 was amended and superseded by Claim number 2109.
13	Casal, Cesar G	1325	$68,999.00	General Unsecured	2101	$14,296.00[1]	General Unsecured	Claim number 1325 was amended and superseded by Claim number 2101.
14	Cestone, Gary	567	$24,000.00	General Unsecured	2174	$35,000.00[2]	General Unsecured	Claim number 567 was amended and superseded by Claim number 2174.
15	Chatham, John	99	$78,107.00	General Unsecured	3102	$14,296.00[1]	General Unsecured	Claim number 99 was amended and superseded by Claim number 3102.
16	Cline, Stephanie	2588	$14,296.00[1]	General Unsecured	2677	Unliquidated	General Unsecured	Claim number 2588 was amended and superseded by Claim number 2677.
17	CN Innovations Limited	106	$4,309.00	General Unsecured	107	$4,309.00	General Unsecured	Claim number 106 was amended and superseded by Claim number 107.
18	CN Innovations Limited	107	$4,309.00	General Unsecured	214	$4,309.00	General Unsecured	Claim number 107 was amended and superseded by Claim number 214.
19	CN Innovations Limited	214	$4,309.00	General Unsecured	215	$4,209.00	General Unsecured	Claim number 214 was amended and superseded by Claim number 215.
20	Cork, Pauline	2849	$20,000.00	General Unsecured	2855	$20,000.00	General Unsecured	Claim number 2849 was amended and superseded by Claim number 2855.
21	Cumberlander, Christian	273	$59,681.17	General Unsecured	1419	$35,000.00[2]	General Unsecured	Claim number 273 was amended and superseded by Claim number 1419.
22	David Eugene Merrell	2203	Unliquidated	General Unsecured	2221	Unliquidated	General Unsecured	Claim number 2203 was amended and superseded by Claim number 2221.
23	de Zilva, Douglas Alain	2155	$40,000.00	General Unsecured	2153	$35,000.00[2]	General Unsecured	Claim number 2155 was amended and superseded by Claim number 2153.

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[2] Amount previously reduced and fixed (or liquidated and fixed, as applicable) pursuant to the Order filed at D.I. 1301.

Schedule 1 - Amended and Superseded Claims

24	Delahoussaye, James	2469	$20,000.00	General Unsecured	2470	$14,296.00[1]	General Unsecured	Claim number 2469 was amended and superseded by Claim number 2470.
25	Delgadillo, Ricardo	247	$30,000.00	General Unsecured	1927	$35,000.00[2]	General Unsecured	Claim number 247 was amended and superseded by Claim number 1927.
26	Dickerman, Richard and Jagmin, Nancy	3713	Unliquidated	General Unsecured	3636	$259,481.80	General Unsecured	Claim number 3713 was amended and superseded by Claim number 3636.
27	DiClemente, Gino	2337	$68,700.00	General Unsecured	2343	$14,296.00[1]	General Unsecured	Claim number 2337 was amended and superseded by Claim number 2343.
28	Diers, Randall	3173	$30,000.00	General Unsecured	3232	$14,296.00[1]	General Unsecured	Claim number 3173 was amended and superseded by Claim number 3232.
29	Erlandson, Christine	479	$79,408.00	General Unsecured	3574	$79,408.00	General Unsecured	Claim number 479 was amended and superseded by Claim number 3574.
30	Eshraghi, Saeed	372	$30,000.00	General Unsecured	1229	$78,134.00	General Unsecured	Claim number 372 was amended and superseded by Claim number 1229.
31	Fletcher, Kelly	336	$72,314.32	General Unsecured	1876	$77,000.00	General Unsecured	Claim number 336 was amended and superseded by Claim number 1876.
32	Frick, Thomas	1764	Unliquidated	General Unsecured	1776	$35,000.00[2]	General Unsecured	Claim number 1764 was amended and superseded by Claim number 1776.
33	Fuhrman, Michael	1175	$30,000.00	General Unsecured	3678	$14,296.00[1]	General Unsecured	Claim number 1175 was amended and superseded by Claim number 3678.
34	Galli, Anthony	634	$35,000.00[2]	General Unsecured	3623	$73,926.00	General Unsecured	Claim number 634 was amended and superseded by Claim number 3623.
35	Garimella, Murali K	3270	$35,000.00[2]	General Unsecured	3315	$35,000.00[2]	General Unsecured	Claim number 3270 was amended and superseded by Claim number 3315.
36	Goldfarb, Amy	429	$30,000.00	General Unsecured	1983	$14,296.00[1]	General Unsecured	Claim number 429 was amended and superseded by Claim number 1983.
37	Gullapalli, Padmaja	349	$30,000.00	General Unsecured	1936	$14,296.00[1]	General Unsecured	Claim number 349 was amended and superseded by Claim number 1936.
38	Gunther Rid-Stiftung fur den bayerischen Einzelhandel	3097	$452,806.76	General Unsecured	4301	$2,260,798.61	General Unsecured	Claim number 3097 was amended and superseded by Claim number 4301.
39	Harris, David Anthony	355	$25,000.00	General Unsecured	357	$20,000.00	General Unsecured	Claim number 355 was amended and superseded by Claim number 357.
40	Hemenway, Marcus	3146	$30,800.00	General Unsecured	4265	$30,000.00	General Unsecured	Claim number 3146 was amended and superseded by Claim number 4265.
41	Humphrey, Greg	43	$30,000.00	General Unsecured	44	$30,000.00	General Unsecured	Claim number 43 was amended and superseded by Claim number 44.
42	HYG Financial Services, Inc.	1907	$68,210.32	General Unsecured	4286	$45,584.92	General Unsecured	Claim number 1907 was amended and superseded by Claim number 4286.
43	Intellias Global Limited	551	$138,511.00	General Unsecured	560	$138,511.00	General Unsecured	Claim number 551 was amended and superseded by Claim number 560.
44	Jeng, James	1512	$62,874.84	General Unsecured	1823	$14,296.00[1]	General Unsecured	Claim number 1512 was amended and superseded by Claim number 1823.
45	Jenkins, Gary C.	257	$40,000.00	General Unsecured	2730	$14,296.00[1]	General Unsecured	Claim number 257 was amended and superseded by Claim number 2730.
46	Karla, Maureen	2674	$30,000.00	General Unsecured	2691	$109,140.46	General Unsecured	Claim number 2674 was amended and superseded by Claim number 2691.
47	Kihara, Annalisa	1351	$30,000.00	General Unsecured	1339	$30,000.00	General Unsecured	Claim number 1351 was amended and superseded by Claim number 1339.
48	Kim, John	1442	$35,000.00[2]	General Unsecured	4302	$50,000.00	General Unsecured	Claim number 1442 was amended and superseded by Claim number 4302.

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[2] Amount previously reduced and fixed (or liquidated and fixed, as applicable) pursuant to the Order filed at D.I. 1301.

Schedule 1 - Amended and Superseded Claims

49	Kirkendall, Eric	1689	$20,000.00	General Unsecured	1904	$35,000.00[2]	General Unsecured	Claim number 1689 was amended and superseded by Claim number 1904.
50	Landis, Ned A	1732	$3,800.00	General Unsecured	2195	$35,000.00[2]	General Unsecured	Claim number 1732 was amended and superseded by Claim number 2195.
51	Liu, Jennifer	225	$84,535.24	General Unsecured	230	$84,535.24	General Unsecured	Claim number 225 was amended and superseded by Claim number 230.
52	Lyle, Glen	511	$31,000.00	General Unsecured	1953	$35,000.00[2]	General Unsecured	Claim number 511 was amended and superseded by Claim number 1953.
53	Madrid, Jacob	1501	$36,770.96	General Unsecured	2040	$36,770.96	General Unsecured	Claim number 1501 was amended and superseded by Claim number 2040.
54	Madrid, Jacob	2040	$36,770.96	General Unsecured	2038	$35,000.00[2]	General Unsecured	Claim number 2040 was amended and superseded by Claim number 2038.
55	Majumdar, Ketav	108	$702,077.00	General Unsecured	109	$70,277.57	General Unsecured	Claim number 108 was amended and superseded by Claim number 109.
56	Mapatunage, Saminda P	325	$30,000.00	General Unsecured	1261	$30,000.00	General Unsecured	Claim number 325 was amended and superseded by Claim number 1261.
57	Martinez, Jose	29	$15,000.00	General Unsecured	1725	$14,296.00[1]	General Unsecured	Claim number 29 was amended and superseded by Claim number 1725.
58	Marttinen, Jennifer	475	$35,000.00[2]	General Unsecured	4245	$70,000.00	General Unsecured	Claim number 475 was amended and superseded by Claim number 4245.
59	Mohammadi, Farhad	568	$37,000.00	General Unsecured	2760	$20,000.00	General Unsecured	Claim number 568 was amended and superseded by Claim number 2760.
60	Mohem, Gurmeet	3461	$78,826.61	General Unsecured	3465	$14,296.00[1]	General Unsecured	Claim number 3461 was amended and superseded by Claim number 3465.
61	Morocco, James R	451	$5,000.00	General Unsecured	3581	$1,650.00	General Unsecured	Claim number 451 was amended and superseded by Claim number 3581.
62	Muench, Michael	73	$31,200.00	General Unsecured	2392	Unliquidated	General Unsecured	Claim number 73 was amended and superseded by Claim number 2392.
63	Mullin, Paul	193	$35,000.00[2]	General Unsecured	2400	$35,000.00[2]	General Unsecured	Claim number 193 was amended and superseded by Claim number 2400.
64	Nanra, Jasdeep	1072	$30,000.00	General Unsecured	1075	$14,296.00[1]	General Unsecured	Claim number 1072 was amended and superseded by Claim number 1075.
65	Nerenberg, Ira	387	$14,296.00[1]	General Unsecured	3862	$32,000.00	General Unsecured	Claim number 387 was amended and superseded by Claim number 3862.
66	Nguyen, The	1812	Unliquidated	General Unsecured	1813	$14,296.00[1]	General Unsecured	Claim number 1812 was amended and superseded by Claim number 1813.
67	Nguyen, Tin V	293	$70,000.00	General Unsecured	2050	$35,000.00[2]	General Unsecured	Claim number 293 was amended and superseded by Claim number 2050.
68	Ordonez, Pablo	3034	$80,000.00	General Unsecured	3153	$100,000.00	General Unsecured	Claim number 3034 was amended and superseded by Claim number 3153.
69	Parekh, Nirav	45	$30,000.00	General Unsecured	3291	$14,296.00[1]	General Unsecured	Claim number 45 was amended and superseded by Claim number 3291.
70	Parikh, Devang	527	$70,000.00	General Unsecured	2226	$14,296.00[1]	General Unsecured	Claim number 527 was amended and superseded by Claim number 2226.
71	Patapati, Kishore	134	$30,000.00	General Unsecured	135	$14,296.00[1]	General Unsecured	Claim number 134 was amended and superseded by Claim number 135.
72	Patel, Nirmalkumar	259	$20,000.00	General Unsecured	1415	$20,000.00	General Unsecured	Claim number 259 was amended and superseded by Claim number 1415.
73	Patel, Nirmalkumar	1415	$20,000.00	General Unsecured	1819	$14,296.00[1]	General Unsecured	Claim number 1415 was amended and superseded by Claim number 1819.

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[2] Amount previously reduced and fixed (or liquidated and fixed, as applicable) pursuant to the Order filed at D.I. 1301.

Schedule 1 - Amended and Superseded Claims

74	Pattanashetti, Praveena	2718	$30,000.00	General Unsecured	2756	$14,296.00[1]	General Unsecured	Claim number 2718 was amended and superseded by Claim number 2756.
75	Pedley, David	96	$25,000.00	General Unsecured	2240	$14,296.00[1]	General Unsecured	Claim number 96 was amended and superseded by Claim number 2240.
76	Ramos, Adylson and Kristin	406	$30,000.00	General Unsecured	3063	$14,296.00[1]	General Unsecured	Claim number 406 was amended and superseded by Claim number 3063.
77	Rao, Jaidev	2435	$14,296.00[1]	General Unsecured	2444	$35,000.00[2]	General Unsecured	Claim number 2435 was amended and superseded by Claim number 2444.
78	Ratiwanich, Jak	428	$78,575.00	General Unsecured	572	$35,000.00[2]	General Unsecured	Claim number 428 was amended and superseded by Claim number 572.
79	Rayaprolu, Vamsi Pavan	42	$14,296.00[1]	General Unsecured	2807	$35,000.00[2]	General Unsecured	Claim number 42 was amended and superseded by Claim number 2807.
80	Roldan, Karen	2573	Unliquidated	General Unsecured	3551	Unliquidated	General Unsecured	Claim number 2573 was amended and superseded by Claim number 3551.
81	Roldan, Karen	2611	Unliquidated	General Unsecured	3529	Unliquidated	General Unsecured	Claim number 2611 was amended and superseded by Claim number 3529.
82	Rosario, Jose	2964	Unliquidated	General Unsecured	2982	$14,296.00[1]	General Unsecured	Claim number 2964 was amended and superseded by Claim number 2982.
83	Rosenthal, Michael	3305	$14,296.00[1]	General Unsecured	3336	$35,000.00[2]	General Unsecured	Claim number 3305 was amended and superseded by Claim number 3336.
84	Sabbag, Kenneth	573	$10,000.00	General Unsecured	2751	$14,296.00[1]	General Unsecured	Claim number 573 was amended and superseded by Claim number 2751.
85	Sayyaparaju, Sarat Kumar Varma	3492	$15,000.00	General Unsecured	3500	$15,000.00	General Unsecured	Claim number 3492 was amended and superseded by Claim number 3500.
86	SBS-Feintechnik GmbH and Co. KG	1116	$96,700.21	General Unsecured	1346	$402,327.34	General Unsecured	Claim number 1116 was amended and superseded by Claim number 1346.
87	Shklovsky, Michael A.	477	$78,182.00	General Unsecured	3602	$78,182.00	General Unsecured	Claim number 477 was amended and superseded by Claim number 3602.
88	Silver, Michael	2428	$10,000.00	General Unsecured	2616	$10,000.00	General Unsecured	Claim number 2428 was amended and superseded by Claim number 2616.
89	Silverman, Howard	604	Unliquidated	General Unsecured	2297	$15,000.00	General Unsecured	Claim number 604 was amended and superseded by Claim number 2297.
90	Simonian, Lonny	344	$79,409.00	General Unsecured	2583	$35,000.00[2]	General Unsecured	Claim number 344 was amended and superseded by Claim number 2583.
91	Singh, Baljinder	2073	$14,296.00[1]	General Unsecured	3834	$69,624.00	General Unsecured	Claim number 2073 was amended and superseded by Claim number 3834.
92	Singh, Baljinder	3834	$69,624.00	General Unsecured	3829	$69,624.00	General Unsecured	Claim number 3834 was amended and superseded by Claim number 3829.
93	Spies, Gary	2636	$30,000.00	General Unsecured	2655	$30,000.00	General Unsecured	Claim number 2636 was amended and superseded by Claim number 2655.
94	St. Germaine, Kevin	2600	Unliquidated	General Unsecured	2613	$35,000.00[2]	General Unsecured	Claim number 2600 was amended and superseded by Claim number 2613.
95	Suweidan, Rich	1462	$30,000.00	General Unsecured	2426	$35,000.00[2]	General Unsecured	Claim number 1462 was amended and superseded by Claim number 2426.
96	Szekely, Les	1616	$30,000.00	General Unsecured	2963	$14,296.00[1]	General Unsecured	Claim number 1616 was amended and superseded by Claim number 2963.
97	Tiwana, Hardeep Singh	198	$14,296.00[1]	General Unsecured	3188	$35,000.00[2]	General Unsecured	Claim number 198 was amended and superseded by Claim number 3188.
98	Tuxill, John	423	$20,000.00	General Unsecured	3145	Unliquidated	General Unsecured	Claim number 423 was amended and superseded by Claim number 3145.

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[2] Amount previously reduced and fixed (or liquidated and fixed, as applicable) pursuant to the Order filed at D.I. 1301.

Schedule 1 - Amended and Superseded Claims

99	TVAB Holdings LLC d/b/a NTS Communications Inc	461	$5,913.20	General Unsecured	1284	$8,309.04	General Unsecured	Claim number 461 was amended and superseded by Claim number 1284.
100	Verghese, Mathew	1408	$181,159.00	General Unsecured	1413	$181,159.00	General Unsecured	Claim number 1408 was amended and superseded by Claim number 1413.
101	Wang, Justin K	142	$64,459.59	General Unsecured	144	$64,459.59	General Unsecured	Claim number 142 was amended and superseded by Claim number 144.
102	Weiler, Michelle	119	$30,000.00	General Unsecured	169	$14,296.00[1]	General Unsecured	Claim number 119 was amended and superseded by Claim number 169.
103	WM Corporate Services Inc	4200	$1,519.39	General Unsecured	4201	$1,519.39	General Unsecured	Claim number 4200 was amended and superseded by Claim number 4201.
104	Woodland, Blake	1482	$24,508.00	General Unsecured	1495	$24,593.00	General Unsecured	Claim number 1482 was amended and superseded by Claim number 1495.
105	Woodland, Blake	1495	$24,593.00	General Unsecured	3736	$14,296.00[1]	General Unsecured	Claim number 1495 was amended and superseded by Claim number 3736.
106	Wu, Wen Feng	1538	$30,000.00	General Unsecured	1559	$30,000.00	General Unsecured	Claim number 1538 was amended and superseded by Claim number 1559.
107	Yedla, Srinivasa	385	$45,000.00	General Unsecured	1806	$35,000.00[2]	General Unsecured	Claim number 385 was amended and superseded by Claim number 1806.
108	Zavorka, Ryan	162	$20,000.00	General Unsecured	2394	$14,296.00[1]	General Unsecured	Claim number 162 was amended and superseded by Claim number 2394.

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Schedule 2 - Same-Debtor Duplicate Claims

Row	Claimant Name	Duplicate Claim # to be Disallowed	Duplicate Claim Amount	Duplicate Claim Priority	Remaining Claim #	Remaining Claim Amount	Remaining Claim Priority	Remaining Claim Debtor	Reason for Disallowance
1	Britt, Adrienna	4155	$72,000.00	General Unsecured	4167	$72,000.00	General Unsecured	Fisker Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
2	Carley, Patrick	1357	$73,000.00	General Unsecured	2109	$73,000.00	General Unsecured	Fisker Group Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
3	CRC Transport LLC	2103	$35,767.65	General Unsecured	138	$35,767.65	General Unsecured	Fisker Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
4	Davila, Jorge Lobo	296	$77,859.19	General Unsecured	1340	$77,859.19	General Unsecured	Fisker Group Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
5	Gelber, Lonnie	2566	Unliquidated	General Unsecured	2563	$14,296.00[1]	General Unsecured	Fisker Group Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
6	Hansen, Bodil and Jorgen Fogh	3435	$93,645.00	General Unsecured	3368	$35,000.00[2]	General Unsecured	Fisker Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
7	Jankovic, Mica	2791	Unliquidated	General Unsecured	2502	$14,296.00[1]	General Unsecured	Fisker Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
8	Kiedrowski, Logan	1647	$30,000.00	General Unsecured	1242	$14,296.00[1]	General Unsecured	Fisker Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
9	LeBard, Waverly Edward	1367	$62,578.78	General Unsecured	1366	$62,578.78	General Unsecured	Fisker Group Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
10	Martin, Fernando	516	$1,000.00	General Unsecured	2131	$1,000.00	General Unsecured	Fisker Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
11	Mirosha, Iman	54	$73,689.00	General Unsecured	473	$73,689.00	General Unsecured	Fisker Group Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
12	Morales, Raul	1742	Unliquidated	General Unsecured	1828	$14,296.00[1]	General Unsecured	Fisker Group Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
13	Morales, Raul	1787	Unliquidated	General Unsecured	1828	$14,296.00[1]	General Unsecured	Fisker Group Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
14	Olson, Scott W.	358	$77,825.19	General Unsecured	1795	$77,825.19	General Unsecured	Fisker Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
15	Pharma Pharma Ltd	2056	$47,000.00	General Unsecured	1933	$35,000.00[2]	General Unsecured	Fisker Group Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
16	Ramanathan, Lakshminarayanan	2508	$30,000.00	General Unsecured	2509	$30,000.00	General Unsecured	Fisker Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
17	Schruntek, Mark	571	$30,000.00	General Unsecured	3011	$30,000.00	General Unsecured	Fisker Inc., Fisker Group Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
18	Sherburne, Kevin	298	$78,334.84	General Unsecured	2753	$78,334.84	General Unsecured	Fisker Group Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
19	Spies, Gary	361	$30,000.00	General Unsecured	2655	$30,000.00	General Unsecured	Fisker Group Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
20	Ticeson, Steven D.	3894	Unliquidated	General Unsecured	3568	$35,000.00[2]	General Unsecured	Fisker Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
21	VAE Industries Corporation	534	$24,774.52	General Unsecured	1201	$24,774.52	General Unsecured	Fisker Group Inc.	The Duplicate Claim is duplicative of the Remaining Claim.
22	Williams, Kevin	1962	$14,296.00[1]	General Unsecured	1942	$35,000.00[2]	General Unsecured	Fisker Inc.	The Duplicate Claim is duplicative of the Remaining Claim.

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Schedule 3 - Equity Claims

Row	Claimant	Claim #	Asserted Total Claim Amount	Asserted Priority	Surviving Claim (If Any)	Reasons for Disallowance
1	Hansen, Ashley	3456	$29,120.00	General Unsecured	Disallowed in full.	Claimant lists "RSUs promised as part of compensation plan. 25 precent were to be vested back to employee" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. 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.
2	Rahimi, Sohail	3382	$75,000.00	General Unsecured	Disallowed in full.	Claimant lists "Never received Performance Stock Shares" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. 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.
3	Rubien, Ira	4098	$45,250.00	General Unsecured	$250.00, General Unsecured	Claimant lists "250 deposit for Fisker car and purchased 3000 shares of common FSR stock" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. Claim No. 4098 attaches proof of stock ownership and Fisker promotional emails. 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, $45,000.00, as the amount of the Claim not attributed to the vehicle deposit, should be disallowed.
4	Wuench, Stephan	270	$141,900.00	General Unsecured	Disallowed in full.	Claimant lists "Service performed" as the basis of the Claim in Box 8 of the applicable Proof of Claim form and attaches an employment contract highlighting the provision related to Restricted Stock Units. 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.
5	Zora, Amanda	2217	$51,000.00	General Unsecured	Disallowed in full.	Claimant lists "Right to claim 51,000 dollars in RSUs" as the basis of the Claim in Box 8 of the applicable Proof of Claim form. 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.