Docket #1361 Date Filed: 07/29/2026

N 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: Docket No. 1338

CERTIFICATE OF NO OBJECTION REGARDING MOTION FOR ENTRY OF AN ORDER FURTHER EXTENDING THE TIME PERIOD WITHIN WHICH THE LIQUIDATING TRUSTEE MAY FILE NOTICES OF REMOVAL OF CLAIMS AND CAUSES OF ACTION RELATED TO THE CHAPTER 11 CASES

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 *Motion for Entry of an Order Further Extending the Time Period Within Which the Liquidating Trustee May File Notices of Removal of Claims and Causes of Action Related to the Chapter 11 Cases* [Docket No. 1338] (the "Motion") filed with the United States Bankruptcy Court for the District of Delaware (the "Court") on July 14, 2026. Pursuant to the Notice of Motion, objections to the Motion were to be filed and served no later than July 28, 2026 at 4:00 p.m. (ET) (the "Objection Deadline").

The Objection Deadline has passed, and no objections or other responsive pleading to the Motion appear on the docket or were served upon the undersigned counsel. It is therefore

[1] The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers or Delaware file numbers, are as follows: Fisker Inc. (0340); Fisker Group Inc. (3342); Fisker TN LLC (6212); Blue Current Holding LLC (6668); Platinum IPR LLC (4839); and Terra Energy Inc. (0739). The address of the debtors' corporate headquarters is 14 Centerpointe Drive, La Palma, CA 90623.

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respectfully requested that the Court enter the Proposed Order attached hereto as **Exhibit A** at the earliest convenience of the Court.

Dated: July 29, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Stacy L. Newman

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Exhibit A

Proposed Form of 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. 1338

ORDER FURTHER EXTENDING THE TIME PERIOD WITHIN WHICH THE LIQUIDATING TRUSTEE MAY FILE NOTICES OF REMOVAL OF CLAIMS AND CAUSES OF ACTION RELATED TO THE CHAPTER 11 CASES

THIS MATTER having come before the Court[2] upon the *Motion of the Liquidating Trustee for Entry of an Order Further Extending the Time Period Within Which the Liquidating Trustee May File Notices of Removal of Claims and Causes of Action Related to the Chapter 11 Cases* (the "**Motion**"), filed by Matthew Dundon, solely in his capacity as the Liquidating Trustee (the "**Liquidating Trustee**") of the Fisker Liquidating Trust, by and through his co-counsel, seeking entry of an order (this "**Order**") further extending the Removal Deadline by approximately one hundred eighty (180) days from August 10, 2026, through and including February 8, 2027, without prejudice to the Liquidating Trustee's right to seek further extensions, and any position the Liquidating Trustee may take regarding whether Bankruptcy Code section 362 applies to stay any given Action, as more fully described in the Motion; 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

[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] Capitalized terms utilized but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

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 Motion and opportunity for response having been given; and it appearing that no other notice need be given; and the Court having considered the Motion and any responses thereto; and upon the record herein; and, after due deliberation and sufficient cause appearing therefore,

It is hereby ORDERED that:

1. The Motion is GRANTED as set forth herein.

2. The Removal Deadline is extended through and including February 8, 2027.

3. The relief granted herein is without prejudice to the Liquidating Trustee's right to seek further extensions of the Removal Deadline.

4. The Liquidating Trustee and his authorized representatives are authorized and empowered to take any and all actions necessary to implement the terms of this Order.

5. The terms and conditions of this Order shall be immediately enforceable and effective upon its entry.

6. This Court retains jurisdiction over all matters arising from or related to the interpretation, implementation and enforcement of this Order.