Docket #1377 Date Filed: 08/17/2026

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: October 13, 2026 at 11:00 a.m. (ET) **Objection Deadline: September 8, 2026 at 4:00 p.m. (ET)**

LIQUIDATING TRUSTEE'S TWENTY-FIRST OMNIBUS OBJECTION (NON-SUBSTANTIVE) PURSUANT TO 11 U.S.C. § 502, FED. R. BANKR. P. 3007 AND LOCAL RULE 3007-1 TO CERTAIN (I) NO LIABILITY CLAIMS; (II) AMENDED AND SUPERSEDED CLAIMS; (III) LATE-FILED CLAIMS; AND (IV) EQUITY CLAIMS

*****CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON SCHEDULE 1, SCHEDULE 2, SCHEDULE 3 AND/OR SCHEDULE 4 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 Proofs of Claim[2] listed on **Schedule 1** to the Proposed Order for which the Debtors' estates have no liability (the "**No Liability Claims**"), according to the Debtors' Books

[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 herein but not otherwise defined shall have the meaning ascribed to it in the Plan (as defined below).

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and Records (defined below), which Proofs of Claim fail to include sufficient information or documentation to constitute prima facie evidence of a valid Claim; (ii) disallowing in full and expunging the amended and superseded Proofs of Claim[3] listed on **Schedule 2** to the Proposed Order (the "**Amended/Superseded Claims**"); (iii) disallowing in full and expunging the late-filed Proof of Claim listed on **Schedule 3** to the Proposed Order (the "**Late-Filed Claim**"); and (iii) disallowing in full and expunging the Proof of Claim identified on **Schedule 4** to the Proposed Order because such Proof of Claim is based upon ownership of shareholder/equity security interests and/or stock in the Debtors (the "**Equity Claim**" and, together with the Nom Liability Claims, the Amended/Superseded Claims, and the Late-Filed Claim, 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.

[3] Any capitalized term used but not otherwise defined herein shall have the meaning ascribed to it in the Plan (as defined below).

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.[4]

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.

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

[4] 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.

> 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 Prepetition Claims 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] (the "**Verita Certificate of Service**").

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.

16. The Notice of Bar Dates further provides:

> **Instructions for Filing Proofs of Claim for Prepetition Claims.** Any person or entity asserting a prepetition claim against the Debtors MUST abide by the following procedures and requirements in preparing and filing proofs of claim: … [a] claim must be submitted **so as to be actually received** on or before the applicable Bar Date. Proofs of claim sent by means other than as described above will not be accepted. **It is NOT sufficient for the Proof of Claim to be post-marked by the applicable Bar Date. It must be RECEIVED by the applicable Bar Date.**
>
> **Consequences of Failing to Timely File Your Claim.** ABSENT FURTHER ORDER OF THE COURT, ANY HOLDER OF A CLAIM THAT IS NOT EXEMPTED FROM THE REQUIREMENTS OF THE BAR DATE ORDER, AS SET FORTH ABOVE, AND THAT FAILS TO TIMELY FILE A PROOF OF CLAIM IN THE APPROPRIATE FORM BY THE APPLICABLE BAR DATE AS DESCRIBED IN THIS NOTICE SHALL NOT BE TREATED AS A CREDITOR WITH RESPECT TO SUCH CLAIM FOR THE PURPOSES OF VOTING AND DISTRIBUTION.

See Id.

17. A true and correct copy of the Notice of Bar Dates is attached as Exhibit A to the *Declaration of Darlene Calderon in Support of Liquidating Trustee's Eleventh Omnibus Objection (Non-Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain Late-Filed Claims* [D.I. 1107] (the "**Calderon Declaration**").

C. Administrative Claims Bar Date

18. 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.

19. 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.

20. Consequently, all applicable Bar Dates have passed.

C. Claim Objection Deadline

21. Pursuant to the *Order Extending the Period to File and Serve Objections to Claims and Interests* [D.I. 1364], the deadline for the Liquidating Trustee to object to and all Claims and Interests, including but not limited to prepetition Claims and Interests and Administrative Claims, is February 15, 2027, subject to the Liquidating Trustee's right to seek additional extensions.

D. Claim Objection Procedures

22. 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].

23. Among other things, the Claim 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

24. 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.

25. The Liquidating Trustee , for and his employees, advisors and professionals (the "**Reviewing Parties**") continue to undertake 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 includes identifying categories of Claims that may be targeted for disallowance and expungement, reduction and/or reclassification. *See id*

26. 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.

27. The Reviewing Parties have reviewed the Disputed Claims and have determined that such Claims are objectionable on non-substantive grounds and should be disallowed and expunged in full, or in part, as applicable, because such Proofs of Claim are No Liability Claims, Amended/Superseded Claims, Late-Filed Claims or Equity Claims, respectively, for the reasons set forth herein and on **Schedule 1**, **Schedule 2,** **Schedule 3** and **Schedule 4** to the Proposed Order[5] *See* Wright Declaration ¶ 5.

RELIEF REQUESTED

28. 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**, **Schedule 3** and

[5] 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.

Schedule 4 to the Proposed Order. In that regard, the Liquidating Trustee respectfully requests entry of the Proposed Order: (i) disallowing in full and expunging the No Liability Claims; (ii) disallowing in full and expunging the Amended/Superseded Claims; (iii) disallowing in full and expunging the Late-Filed Claim; and (iv) disallowing in full and expunging the Equity Claim.

BASIS FOR RELIEF

29. 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).

30. 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).

31. 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).

32. 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).

33. 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).

34. 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: … (iii) Amended or superseded claim; (iv) Late filed claim; …. (v) Stockholder claim based on stock ownership, but not a stockholder claim for damages; and (vi) Claim that does not have a basis in the debtor's books and records and does not include or attach information or documents sufficient to constitute prima facie evidence of the validity and amount of the claim under Fed. R. Bankr. P. 3001(f)." *See* Del. Bankr. L.R. 3007-1(c)(iii), (iv), (v), and (vi).

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

A. <u>No Liability Claims</u>

36. Bankruptcy Code section 502(b)(1) provides that a claim asserted in a proof of claim shall be allowed, except to the extent "such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law." 11 U.S.C. § 502(b)(1).

37. The Reviewing Parties have identified certain No Liability Claims listed on **Schedule 1** to the Proposed Order that the Liquidating Trust is unable to reconcile with the Debtors' Books and Records. *See* Wright Declaration at ¶ 6.

38. Specifically, the Reviewing Parties believe that the No Liability Claims are not valid Claims because: (i) the Proofs of Claim do not include or attach information or documents sufficient to constitute *prima facie* evidence of the validity and amount of the Claim; and (ii) the Liquidating Trustee cannot ascertain a basis for any of the No Liability Claims after a reasonable review of the Debtors' Books and Records. *See* Wright Declaration at ¶ 7.

39. Failure to disallow and expunge No Liability Claims could result in the applicable claimant receiving an unwarranted recovery against the Debtors' estates, to the detriment of other stakeholders. *See* Wright Declaration at ¶ 8.

40. Therefore, pursuant to Bankruptcy Code section 502(b)(1), Bankruptcy Rule 3007, Local Rule 3007-1(c) and the Claim Objection Procedures, the Liquidating Trustee respectfully requests that the Court enter the Proposed Order disallowing in full and expunging the No Liability Claims.

B. Amended/Superseded Claims

41. 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).

42. The Reviewing Parties have reviewed the Proofs of Claim listed on **Schedule 2** to the Proposed Order and have 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 ¶ 9.

43. Unless the Amended/Superseded Claims are disallowed, the claimants listed on **Schedule 2** to the Proposed Order could receive a duplicative recovery from the Debtors' estates, to the detriment of other stakeholders. *See* Wright Declaration ¶ 10.

44. 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 2** to the Proposed Order. *See* Wright Declaration ¶ 11.

45. Accordingly, the Liquidating Trustee seeks entry of the Proposed Order disallowing in full and expunging each of the Amended/Superseded Claims listed on **Schedule 2** to the Proposed Order.

C. Late-Filed Claims

46. Pursuant to Bankruptcy Code section 502(b)(9), a claim shall not be allowed "to the extent that . . . proof of such claim is not timely filed[.]" 11 U.S.C. § 502(b)(9); *see also First Fidelity Bank, N.A. v. Hooker Inves. Inc. (In re Hooker Inves. Inc.)*, 937 F.2d 833, 840 (2d Cir. 1991) (enforcing the bar date and stating, inter alia, that "a bar date order does not function merely as a procedural gauntlet"); *In re Keene Corp., 188 B.R. 903, 907* (Bankr. S.D.N.Y. 1995) (stating that the "[b]ar date is akin to a statute of limitations, and must be strictly observed").

47. Moreover, the timeliness of Proofs of Claim asserted against the Debtors in these Chapter 11 Cases is determined with reference to the Bar Dates fixed by the Court, in accordance with Bankruptcy Rule 3003(c)(3). This rule contributes to one of the main purposes of bankruptcy law, which is securing -- within a limited time -- the prompt and effectual administration and settlement of a debtor's estate. *In re New Century TRS Holdings, Inc.*, 465 B.R. 38, 46 (Bankr. D. Del. 2012) (citing *In re Smidth & Co.*, 413 B.R. 161, 165 (Bankr. D. Del. 2009)). While setting an outside limit for the time to assert a right triggers due process concerns of which every court must be cognizant, this concern is resolved through notice. *Id*.

48. The Notice of Bar Dates was served upon, among others, the claimant that filed the Late-Filed Claim identified on **Schedule 3** to the Proposed Order. *See* Verita Certificate of Service, p. 658. The Notice of Bar Dates listed September 11, 2024 at 5:00 p.m. (prevailing Eastern Time) as the General Bar Date. *See* Calderon Declaration; *see also* Notice of Bar Dates. The Notice of Bar Dates further contained clear and explicit instructions to creditors as to the process by which they may file Proofs of Claim. *See* Notice of Bar Dates.

49. For creditors who receive proper notice, the bar date is a "drop-dead date" that prevents a creditor from asserting prepetition claims unless he can demonstrate excusable neglect. *In re TransWorld Airlines, Inc.*, 96 F.3d 687, 690 (3d Cir. 1996).

50. The Reviewing Parties have determined that the Proof of Claim reflected on **Schedule 3** to the Proposed Order was filed nearly two years after the applicable Bar Date, and that there is no basis to nevertheless accept the Late-Filed Claim as timely. Indeed, such Proof of Claim Claim: (a) arose prior to the Petition Date; (b) was subject to the requirement that Proofs of Claim be filed no later than the applicable Bar Date; and (c) was nonetheless filed after the

applicable Bar Date, as indicated by the dates identified in the column headed "Date Claim Filed" on **Schedule 3** to the Proposed Order. *See* Wright Declaration ¶ 13.

51. Furthermore, the claimant identified on **Schedule 3** to the Proposed Order never sought—much less obtained—relief from the Court pursuant to Bankruptcy Rule 9006 to file a late Proof of Claim or otherwise demonstrated excusable neglect, despite that the applicable Bar Date occurred nearly two years ago. *See* Wright Declaration ¶ 14.

52. Accordingly, the Late-Filed Claim is untimely and should be disallowed in full and expunged pursuant to Bankruptcy Code section 502(b)(9). Moreover, permitting the Late-Filed Claim to survive despite its untimeliness would hinder the bankruptcy process and the Plan because the claimant could receive a recovery to which they are not entitled to the detriment of holders of properly filed allowed Claims (if such Late-Filed Claim was ultimately allowed). *See e.g., Bank of Am. Nat'l Trust & Sav. Ass'n v. 203 N. LaSalle St. P'ship*, 526 U.S. 434, 453 (1999) (bar dates play an essential role in the important goal of maximizing property available to satisfy creditors)

D. Equity Claims

53. The Equity Claim identified on **Schedule 4** to the Proposed Order was filed by a claimant asserting rights to a distribution in the Chapter 11 Cases based upon ownership of shareholder/equity interests, and does not allege damages associated therewith. *See* Wright Declaration ¶ 16.

54. 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).

55. 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.

56. The allowance of the Equity Claim 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.

57. Accordingly, the Liquidating Trustee objects to the Equity Claim and requests entry of the Proposed Order disallowing and expunging the same, as set forth on **Schedule 3** to the Proposed Order.

RESPONSES TO OMNIBUS OBJECTIONS

58. 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 September 8, 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.

59. 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.

60. 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

61. 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

62. 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

63. 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. Should one or more of the grounds of objection stated in this Objection be dismissed, the Liquidating Trustee reserves 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

64. 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**, **Schedule 3** and **Schedule 4** 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

65. 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

66. 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: August 17, 2026
Wilmington, Delaware

COLE SCHOTZ P.C.

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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: October 13, 2026 at 11:00 a.m. (ET) **Objection Deadline: September 8, 2026 at 4:00 p.m. (ET)**

NOTICE OF LIQUIDATING TRUSTEE'S TWENTY-FIRST OMNIBUS OBJECTION (NON-SUBSTANTIVE) PURSUANT TO 11 U.S.C. § 502, FED. R. BANKR. P. 3007 AND LOCAL RULE 3007-1 TO CERTAIN (I) NO LIABILITY CLAIMS; (II) AMENDED AND SUPERSEDED CLAIMS; (III) LATE-FILED CLAIMS; AND (IV) EQUITY CLAIMS

*****CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON SCHEDULE 1, SCHEDULE 2, SCHEDULE 3 AND SCHEDULE 4 TO THE PROPOSED ORDER**

PLEASE TAKE NOTICE, that on August 17, 2026, Matthew Dundon, solely in his capacity as the Liquidating Trustee (the "**Liquidating Trustee**") of the Fisker Liquidating Trust, filed the *Liquidating Trustee's Twenty-First Omnibus Objection (Non-Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain (I) No Liability Claims; (II) Amended and Superseded Claims; (III) Late-Filed Claims; and (IV) 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 **September 8, 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, 3rd Floor, Courtroom #7, Wilmington, Delaware 19801 on **October 13, 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: August 17, 2026
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Justin R. Alberto

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Co-Counsel to the Liquidating Trustee

Exhibit A

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 TWENTY-FIRST OMNIBUS OBJECTION (NON-SUBSTANTIVE) PURSUANT TO 11 U.S.C. § 502, FED. R. BANKR. P. 3007 AND LOCAL RULE 3007-1 TO CERTAIN (I) NO LIABILITY CLAIMS; (II) AMENDED AND SUPERSEDED CLAIMS; (III) LATE-FILED CLAIMS; AND (IV) EQUITY CLAIMS

THIS MATTER having come before the Court[2] upon the *Liquidating Trustee's Twenty-First Omnibus Objection (Non-Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain (I) No Liability Claims; (II) Amended and Superseded Claims; (III) Late-Filed Claims; and (IV) 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 No Liability Claims; (ii) disallowing in full and expunging the Amended/Superseded Claims; (iii) disallowing in full and expunging the Late-Filed Claim; and (iii) disallowing in full and expunging the Equity Claim, each for the reasons set forth in the Objection and on **Schedule 1**, **Schedule 2**,

[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 Objection.

Schedule 3, and **Schedule 4** attached hereto; 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 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 No Liability Claims listed on **Schedule 1** hereto, Amended/Superseded Claims listed on **Schedule 2** hereto, the Late-Filed Claim listed on **Schedule 3** hereto, and the Equity Claim listed on **Schedule 4** 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) a No Liability Claim listed on **Schedule 1** hereto; (ii) an Amended/Superseded Claim listed on **Schedule 2** hereto; (iii) the Late-Filed Claim listed on **Schedule 3** attached hereto; and (iii) the Equity Claim listed on **Schedule 4** attached hereto was properly and timely served with a copy of the Objection, the Wright Declaration, this Order, the accompanying schedules of DisputedClaims, 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 No Liability Claims listed on **Schedule 1** hereto are hereby disallowed in full and expunged for all purposes.

4. Each of the Amended/Superseded Claims listed on **Schedule 2** hereto are hereby disallowed in full and expunged for all purposes.

5. The Late-Filed Claim listed on **Schedule 3** hereto is hereby disallowed in full and expunged for all purposes.

6. The Equity Claim listed on **Schedule 4** hereto is hereby disallowed in full and expunged for all purposes.

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 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.

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 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 - No Liability Claims

Row	Claimant Name	Claim No.	Asserted Claim Amount	Asserted Claim Priority	Reasons for Disallowance
1	Abernethy-Grottkau, Rebekah J.	2671	$73,337.50	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
2	Beltran, Joshua	2808	$30,000.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
3	Britt, Walt M.	3260	$77,627.07	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
4	Britt, Walt M.	3245	$77,627.07	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
5	Chase, Brian	1073	$64,068.02	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
6	Corte Madera Village, LLC	3189	$65,221.38	Administrative	According to the Debtors' Books and Records, the Administrative Claim has no legal basis. The Debtors did not occupy, use, or otherwise derive any benefit from the subject premises as of, or anytime after, the Petition Date. In addition, the subject lease of non-residential real property was rejected as of the Petition Date. Therefore, the Claim is not on account of an actual, necessary cost or expense of preserving the Debtors' estates as required under 11 U.S.C. § 503(b)(1)(A). The Claim should therefore be disallowed.

Schedule 1 - No Liability Claims

7	Dealertrack, Inc.	3622	$44,000.00	Secured	The Claim and supporting documentation establish that the Claim has been fully satisfied through setoff under 11 U.S.C. § 553. Therefore, the Claim should be disallowed.
8	DeVico, Matt	1484	$35,000.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
9	Grottkau, James	446	$73,337.50	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
10	Hossell, Robert	3582	$60,000.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
11	Johnston, Matt	1970	$70,000.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
12	Lidzell, Maria	531	$26,845.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
13	Lief, Christopher	1390	$60,795.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.

Schedule 1 - No Liability Claims

14	Lief, Christopher	1935	$60,795.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
15	Lief, Christopher	1937	$60,795.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
16	Lief, Christopher	1940	$60,795.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
17	Lief, Christopher	1945	$60,795.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
18	Lief, Christopher	1977	$60,795.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
19	Machado, Tiago Bugalho	3316	$264,000.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
20	Marttinen, Jennifer	4245	$70,000.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.

Schedule 1 - No Liability Claims

21	Ortbals, Chris	1996	$25,000.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
22	Pennsylvania Department of Revenue	15	$436,594.66	Priority, General Unsecured	The Claim amount was reconciled to the Debtor's Books and Records, tax returns were filed and do not reflect any amounts owed. Therefore, the Claim should be disallowed.
23	Percia, Joseph	2513	$63,820.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
24	Perkins, Scott	4308	$348,000.00	Secured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
25	Ridgeway, Jason	1598	$45,000.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
26	Robledo, Daniel	1246	$12,200.00	Priority, General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
27	Russert, Ricky	1775	$71,612.49	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
28	Shepherdson, Edwin	2322	$30,000.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.

Schedule 1 - No Liability Claims

29	Simpson, Tony	2981	$78,825.61	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
30	Smith, Cameron	1308	$40,000.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
31	Stinson, Robert W.	2181	$40,000.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
32	Sua, Brent	1293	$20,000.00	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
33	Sutedjo, Iwan	1774	$40,430.40	Priority, General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Pursuant to a Severance and General Release Agreement entered into by the claimant and the Debtors, no amounts are outstanding. Therefore, the Claim should be disallowed.
34	Turlapati, Manoj	1645	$70,763.47	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.
35	Uguz, Alpay	1031	$210,000.00	Priority, General Unsecured	According to the Debtors' Books and Records, the claimant received a payment of $11,460.98 on October 15, 2024. Pursuant to a Severance and General Release Agreement entered into by the claimant and the Debtors, no amounts are outstanding. Therefore, the Claim should be disallowed.

Schedule 1 - No Liability Claims

36	Wang, Justin K.	144	$64,459.59	General Unsecured	The Debtors' Books and Records do not reflect any amounts owed to this claimant. Additionally, the Proof of Claim does not include sufficient information or documentation to constitute prima facie evidence of a valid Claim.

Schedule 2 - Amended and Superseded Claims

	Amended and Superseded Claims				Surviving Claim			
Row	Claimant	Claim #	Asserted Claim Amount	Asserted Priority	Claim #	Asserted Claim Amount	Asserted Priority	Reasons for Disallowance
1	Alpiger, Brian	254	$70,000.00	General Unsecured	2552	$35,000.00[1]	General Unsecured	Claim number 254 was amended and superseded by Claim number 2552. Claim number 254 should therefore be disallowed.
2	Alpiger, Brian	2552	$35,000.00[1]	General Unsecured	2555	$14,296.00[2]	General Unsecured	Claim number 2552 was amended and superseded by Claim number 2555. Claim number 2552 should therefore be disallowed.

1. Claim No. 2552 was previously liquidated and fixed pursuant to the Order filed at D.I. 1301.

2. Claim No. 2555 was previously liquidated and fixed pursuant to the Order filed at D.I. 1247.

Schedule 3 - Late Claims

Row	Claimant Name	Date Claim Filed	Claim Number	Claim Amount	Reasons for Disallowance
1	Corte Madera Village LLC	8/18/2025	4281	$254,191.12	The Claim was filed after the General Bar Date of September 11, 2024. Claimant was timely served with the Bar Date Notice. *See* Dkt. No. 495 at 658. The Claim should therefore be disallowed.

Schedule 4 - Equity Claims

Row	Claimant Name	Claim #	Asserted Claim Amount	Asserted Claim Priority	Reasons for Disallowance
1	Goodwin, Akeem	4179	Unliquidated	Administrative	Claimant attaches proof of stock ownership and email correspondence related to Fisker stock. 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. The Claim should therefore be disallowed.

Exhibit B

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 TWENTY-FIRST OMNIBUS OBJECTION (NON-SUBSTANTIVE) PURSUANT TO 11 U.S.C. § 502, FED. R. BANKR. P. 3007 AND LOCAL RULE 3007-1 TO CERTAIN (I) NO LIABILITY CLAIMS; (II) AMENDED AND SUPERSEDED CLAIMS; (III) LATE-FILED CLAIMS; AND (IV) 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 Twenty-First Omnibus Objection (Non-Substantive) Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Local Rule 3007-1 to Certain (I) No Liability Claims; (II) Amended and Superseded Claims; (III) Late-Filed Claims; and (IV) 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

[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 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**, **Schedule 3** and **Schedule 4** attached to the Proposed Order, and I am familiar with the information contained therein.

4. The Reviewing Parties continue to undertake 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. 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 have determined that such Proofs of Claim are objectionable on non-substantive grounds and should be disallowed and expunged in full because such Proofs of Claim are No Liability Claims, Amended/Superseded Claims, a Late-Filed Claim and an Equity Claim, as more fully set forth on the applicable schedules to the Proposed Order.

A. No Liability Claims

6. The Reviewing Parties have identified certain No Liability Claims listed on **Schedule 1** to the Proposed Order that the Liquidating Trust is unable to reconcile with the Debtors' Books and Records.

7. Specifically, to the best of my knowledge and belief, I believe that the No Liability Claims are not valid Claims because: (i) the Claims do not include or attach information or documents sufficient to constitute *prima facie* evidence of the validity and amount of the Claim; and (ii) I cannot ascertain a basis for any of the No Liability Claims after a reasonable review of the Debtors' Books and Records.

8. Further, to the best of my knowledge and belief, and based on the information and Books and Records available to me, failure to disallow and expunge No Liability Claims could result in the applicable claimant receiving an unwarranted recovery against the Debtors' estates, to the detriment of other stakeholders. Accordingly, I believe that the Court should grant the relief requested in the Objection with respect to the No Liability Claims

B. Amended/Superseded Claims

9. The Reviewing Parties have reviewed the Proofs of Claim listed on **Schedule 2** to the Proposed Order and, 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 2** to the Proposed Order is superseded by the "Surviving Claim" indicated thereon and should be therefore disallowed and expunged.

10. 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' es

11. 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 2** to the Proposed Order.

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

C. Late-Filed Claim

13. The Reviewing Parties have reviewed the Proof of Claim listed on **Schedule 3** to the Proposed Order and, to the best of my knowledge, information and belief, and based on the information and the Books and Records available to me, determined that the Proof of Claim was filed untimely and nearly two years after the applicable Bar Date and that there is no basis to nevertheless accept the Late-Filed Claim as timely. Indeed, such Proof of Claim: (a) arose prior to the Petition Date; (b) was subject to the requirement that Proofs of Claim be filed no later than the applicable Bar Date; and (c) was nonetheless filed after the applicable Bar Date, as indicated by the dates identified in the column headed "Date Claim Filed" on **Schedule 3** to the Proposed Order.

14. Furthermore, the claimant identified on **Schedule 3** to the Proposed Order never sought—much less obtained—relief from the Court pursuant to Bankruptcy Rule 9006 to file a late Proof of Claim or otherwise demonstrated excusable neglect, despite that the applicable Bar Date occurred nearly two years ago.

15. Accordingly, I believe that the Court should grant the relief requested in the Objection with respect to the Late-Filed Claim.

D. Equity Claims

16. To the best of my knowledge, information and belief, and based on the information and the Books and Records available to me, the Equity Claim identified on **Schedule 4** to the Proposed Order was filed by a claimant asserting rights to a distribution in the Chapter 11 Cases based upon ownership of shareholder/equity interests, and does not allege damages associated therewith.

17. To the best of my knowledge and belief, and based on the information and Books and Records available to me, the allowance of the Equity Claim would unjustifiably elevate the position of equity security holders to that of creditors, to the detriment of legitimate creditors in the Chapter 11 Cases.

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

E. Conclusion

19. 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: August 17, 2026

/s/ Rick Wright
Rick Wright