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: Docket Nos. 1377, 1392

CERTIFICATION OF COUNSEL REGARDING SUPPLEMENTAL 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 SOLELY WITH RESPECT TO PROOF OF CLAIM NO. 3316

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 as follows:

1. The Liquidating Trustee 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 P. 3007 and Local Rule 3007-1 to Certain (I) No Liability Claims; (II) Amended and Superseded Claims; (III) Late-Filed Claims; and (IV) Equity Claims* [Docket No. 1377] (the "**Objection**")[2] with the United States Bankruptcy Court for the District of Delaware (the "**Court**"). Attached thereto as Exhibit A was a proposed form of order (i) disallowing in full and expunging the No Liability Claims; (ii) disallowing in full and expunging the Amended/Superseded Claims; (iii) disallowing in full and expunging the Late-Filed Claims; and (iii) disallowing in full and expunging the Equity

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

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

Claims, each for the reasons set forth in the Objection and on **Schedule 1**, **Schedule 2**, **Schedule 3**, and **Schedule 4** attached thereto.

2. On October 7, 2026, the Court entered the *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 P. 3007 and Local Rule 3007-1 To Certain (I) No Liability Claims; (II) Amended and Superseded Claims; (III) Late-Filed Claims; and (IV) Equity Claims* [Docket No. 1392] sustaining the Objection as to all claims subject to the Objection with the exception of Claim No. 3316.

3. On October 26, 2026, the Court held a further hearing (the **"Hearing"**) to consider the relief requested in the Objection solely with respect to Claim No. 3316.

4. At the Hearing, the Court sustained the Objection as to Claim No. 3316.

5. Accordingly, attached hereto as **Exhibit 1** is a proposed form of order (the **"Proposed Order"**) sustaining the Objection as to Claim No. 3316.

6. The Liquidating Trustee respectfully requests that the Proposed Order be entered at the earliest convenience of the Court.

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Dated: October 27, 2026
Wilmington, Delaware

COLE SCHOTZ P.C.

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Co-Counsel to the Liquidating Truste

Exhibit 1

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. 1377, 1392

SUPPLEMENTAL 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 SOLELY WITH RESPECT TO PROOF OF CLAIM NO. 3316

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**") [D.I. 1377], filed by Matthew Dundon, solely in his capacity as the Liquidating Trustee (the "**Liquidating Trustee**") of the Fisker Liquidating Trust, seeking entry of an order pursuant to 11 U.S.C. § 502, Bankruptcy Rule 3007 and Local Rule 3007-1: (i) disallowing in full and expunging the No Liability Claims; (ii) disallowing in full and expunging the Amended/Superseded Claims; (iii) disallowing in full and expunging the Late-Filed Claims; and (iii) disallowing in full and expunging the Equity Claims, each for the reasons set forth in the Objection and on **Schedule 1**, **Schedule 2**, **Schedule 3**, and **Schedule 4** attached thereto; and the holder of Proof of Claim No. 3316 (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 Objection.

"**Affected Claimant**") having lodged an informal response to the Objection (the "**Response**"), contesting the relief sought by the Liquidating Trustee as to Proof of Claim No. 3316; and the Court having entered the *Order Granting 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*, which excluded Proof of Claim No. 3316 [D.I. 1392]; 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 and the Response; and the Court having conducted hearings related to the Objection on October 13, 2026 and October 26, 2026, respectively; 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. The Affected Claimant was properly and timely served with a copy of the Objection and related pleadings, the notices of the Objection and related hearing agendas.

C. The Affected Claimant 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 as it relates to Proof of Claim No. 3316 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. The Response is hereby overruled on its merits.

3. Proof of Claim No. 3316 is hereby disallowed in full and expunged for all purposes.

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

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

6. This Court shall retain jurisdiction over the Liquidating Trustee and the Affected Claimant with respect to any matters related to or arising from the Objection and the implementation of this Supplemental Order.