

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

RHODIUM ENCORE LLC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-90448 (ARP)

Jointly Administered

**CERTIFICATION OF NO OBJECTION REGARDING  
BARNES & THORNBURG LLP'S SECOND INTERIM APPLICATION  
FOR PAYMENT OF COMPENSATION AND REIMBURSEMENT OF  
EXPENSES FOR THE PERIOD DECEMBER 1, 2024, THROUGH FEBRUARY 28, 2025**

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, Barnes & Thornburg LLP (“B&T”), counsel to the Special Committee of the Rhodium Enterprises, Inc. Board of Directors (the “Special Committee”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), certifies as follows:

1. On April 15, 2025, B&T filed its *Second Interim Application for Payment of Compensation and Reimbursement of Expenses for the Period December 1, 2024, through February 28, 2025* (the “Application”) (ECF No. 946).<sup>2</sup> Attached to the Application was a

<sup>1</sup> The Special Committee in these chapter 11 cases and the last four digits of their corporate identification numbers are as follows: Rhodium Encore LLC (3974), Jordan HPC LLC (3683), Rhodium JV LLC (5323), Rhodium 2.0 LLC (1013), Rhodium 10MW LLC (4142), Rhodium 30MW LLC (0263), Rhodium Enterprises, Inc. (6290), Rhodium Technologies LLC (3973), Rhodium Renewables LLC (0748), Air HPC LLC (0387), Rhodium Shared Services LLC (5868), Rhodium Ready Ventures LLC (8618), Rhodium Industries LLC (4771), Rhodium Encore Sub LLC (1064), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), and Rhodium Renewables Sub LLC (9511). The mailing and service address of the Special Committee in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.

<sup>2</sup> Capitalized terms used here but not otherwise defined shall have the meaning ascribed to them in the B&T Retention Application.



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proposed form of order (the “*Proposed Order*”) (ECF No. 946-1). Objections to the Application were required to be filed on or prior to Tuesday, May 6, 2025 (the “*Objection Deadline*”).

2. In accordance with paragraph 44 of the *Complex Case Procedures*, the undersigned counsel files this Certificate of No Objection and represents to the Court that: (i) the Objection Deadline has passed; (ii) the undersigned counsel is unaware of any objections to the Application; and (iii) the undersigned counsel has reviewed the Court’s docket and no objections to the Application appears thereon.

3. B&T respectfully requests entry of the Proposed Order.

Respectfully submitted this 7th day of May 2025.

QUINN EMANUEL URQUHART & SULLIVAN,  
LLP

/s/ Patricia B. Tomasco

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/s/ Trace Schmeltz

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*Counsel to the Special Committee of Rhodium  
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**CERTIFICATE OF SERVICE**

I certify that on May 7, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco

Patricia B. Tomasco