

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

In re: RHODIUM ENCORE LLC, <i>et al.</i>,¹ Debtors.	Chapter 11 Case No. 24-90448 (ARP) (Jointly Administered)
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**STIPULATION AND AGREED ORDER ON CERTAIN CLAIMS INCLUDED IN
DEBTORS' OMNIBUS CLAIMS OBJECTION AT DOCKET NO. 1488**

TO THE HONORABLE ALFREDO R. PEREZ, BANKRUPTCY JUDGE:

A. On July 30, 2025, the Debtors filed their *Omnibus Objection to Certain Claims Pursuant to Bankruptcy Code Sections 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 Because Claims Have Been Satisfied and Based on Other Substantive Grounds* (ECF No. 1488) (the “Objection”).

B. The above-referenced debtors and debtors in possession (the “Debtors”) and the below claimants (the “Claimants” and, together with the Debtors, the “Parties”) have reached an agreement on the Objection to resolve the below claims (the “Claims”):

- a. Thomas Lienhart, Claim Nos. 44, and 152;
- b. James M. Farrar and Adda Delgadillo Farrar, Claim Nos. 83, 149 and 151;
- c. Cross the River LLC, Claim Nos. 187, 191, 207, and 211;

¹ The Debtors 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 Debtors in these Chapter 11 Cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.



- d. Elysium Mining LLC, Claim Nos. 188, 193, 214, and 216;
- e. Infinite Mining, LLC, Claim Nos. 197, and 198;
- f. Trine Mining LLC, Claim Nos. 189, 192, 206, 212, and 215.

C. Claimants Thomas Lienhart, James M. Farrar and Adda Delgadillo Farrar, and Infinite Mining, LLC are also “SAFE Holders” as that term is defined in the *Memorandum Opinion Overruling Debtors’ Omnibus Objection at ECF No. 1126 to the SAFE Proofs of Claim* (ECF No. 1592) because each of these Claimants additionally filed their own SAFE claims where they asserted claims based on the respective Simple Agreement for Future Equity entered with Debtor Rhodium Enterprises, Inc. (the “SAFE Claims”).²

D. The Parties therefore file this Stipulation and Agreed Order to resolve the Objection. It is **THEREFORE ORDERED THAT**

1. The secured portion of Claim nos. 44 (Thomas Lienhart), 151 (James M. Farrar and Adda Delgadillo Farrar), and 193 (Elysium Mining LLC) have been satisfied.

2. Claimants Thomas Lienhart, James M. Farrar and Adda Delgadillo Farrar, and Infinite Mining, LLC withdraw with prejudice their Claims against the Debtors, *except* for the respective SAFE Claims included in Claim Nos. 83, 149, 152, 197 and 198.

3. Claimants Cross the River LLC, Elysium Mining, LLC, and Trine Mining LLC withdraw with prejudice their Claims against the Debtors.

² In particular, the SAFE Claims are included in (i) Claim No. 152 for Thomas Lienhart; (ii) Claim Nos. 83 and 149 for James M. Farrar and Adda Delgadillo Farrar; and (iii) Claims Nos. 197 and 198 for Infinite Mining, LLC.

4. Notwithstanding anything to the contrary, nothing in this Stipulation and Agreed Order affect any of the Claimants' claims against nondebtors.

Dated: _____, 2025.

Alfredo R. Pérez
United States Bankruptcy Judge

AGREED TO:

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