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

In re:	§	Chapter 11
	§	
RHODIUM ENCORE LLC, et al., 1	§	Case No. 24-90448 (ARP)
	§	
Debtors.	§	
	§	(Jointly Administered)
	§	

## STRIS & MAHER LLP'S TWELFTH MONTHLY FEE STATEMENT FOR THE PERIOD AUGUST 1, 2025, THROUGH AUGUST 31, 2025

Stris & Maher LLP ("Stris & Maher") submits, pursuant to the Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the "Interim Compensation Order") (ECF No. 264) entered on October 14, 2024, this monthly fee statement for the payment of interim compensation rendered and reimbursement of expenses incurred during the period August 1, 2025, through August 31, 2025 (the "Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of \$188,408.00 (80% of the services rendered), plus \$1,258.81 (100% of the interim expenses incurred). *See* Interim Compensation Order at ¶ 1(a). Summaries of the fees and expenses are attached as Exhibits 1, 2, and 3. Invoices reflecting detailed time entries are attached hereto as Exhibit 4.

<sup>&</sup>lt;sup>1</sup> 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), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), Rhodium Encore Sub LLC (1064), Rhodium Enterprises, Inc. (6290), Rhodium Industries LLC (4771), Rhodium Ready Ventures LLC (8618), Rhodium Renewables LLC (0748), Rhodium Renewables Sub LLC (9511), Rhodium Shared Services LLC (5868), and Rhodium Technologies LLC (3973). The mailing and service address of Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall serve within 14 days after delivery of the Monthly Fee Statement a written notice, via email, upon Stris & Maher and each of the other Fee Notice Parties (as listed below) (the "Written Notice"). The Written Notice shall set forth with reasonable detail the nature of the objection and the amount at issue. If the parties are unable to reach a resolution of the objection within 14 calendar days, the objecting party shall file its objection (the "Objection") with this Court within 3 business days and serve such Objection on Stris & Maher and each of the other Fee Notice Parties. See Interim Compensation Order ¶ 1(c).

The Fee Notice Parties as defined in the Interim Compensation Order are:

- a. Rhodium Enterprises, Inc., Attn: Charles Topping (<a href="mailto:chucktopping@rhdm.com">chucktopping@rhdm.com</a>) and Morgan Soule (<a href="mailto:morgansoule@rhdm.com">morgansoule@rhdm.com</a>), 2617 Bissonnet Street, Suite 234, Houston, Texas 77005;
- b. Debtors' Bankruptcy Counsel, c/o Quinn Emanuel Urquhart & Sullivan, LLP, Attn: Patricia B. Tomasco (pattytomasco@quinnemanuel.com); Razmig Izakelian (razmigizakelian@quinnemanuel.com), Alain Jaquet (alainjaquet@quinnemanuel.com), and Joanna D. Caytas (joannacaytas@quinnemanuel.com), 700 Louisiana, Suite 3900, Houston, Texas 77002;
- Debtors' Financial Advisor, Province, Robinson c. c/o Attn: Mark (mrobinson@provincefirm.com); David Dunn (ddunn@provincefirm.com); Kirsten Lee (klee@province.com); and Andrew Popescu (apopescu@provincefirm.com), 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074:
- d. Galaxy Digital, LLC, in its capacity as DIP Agent, c/o Orrick, Herrington & Sutcliffe LLP, Ryan C. Wooten (<a href="mailto:rwooten@orrick.com">rwooten@orrick.com</a>), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (<a href="mailto:rtrust@orrick.com">rtrust@orrick.com</a>), Mark Franke (<a href="mailto:mfranke@orrick.com">mfranke@orrick.com</a>) and Brandon Batzel (<a href="mailto:bbatzel@orrick.com">bbatzel@orrick.com</a>), 51 West 52nd Street, New York, New York 10019;
- e. Counsel or proposed counsel to any statutory committee appointed in these Chapter 11 Cases; and
- f. United States Trustee, Ha Minh Nguyen (<u>ha.nguyen@usdoj.gov</u>), 515 Rusk, Suite 3516, Houston, Texas 77002.

If no objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Stris & Maher an amount equal to 80% of the fees and 100% of the expenses listed herein, or if an objection is timely served, such percentage of fees and expenses that are not subject to an objection, as stated in the Interim Compensation Order.

Respectfully submitted this 12th day of September, 2025.

## QUINN EMANUEL URQUHART & SULLIVAN, LLP

#### /s/ Patricia B. Tomasco

Patricia B. Tomasco (SBN 01797600) Cameron Kelly (SBN 24120936) Alain Jaquet (*pro hac vice*) 700 Louisiana Street, Suite 3900 Houston, Texas 77002

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Eric Winston (*pro hac vice*) Razmig Izakelian (*pro hac vice*) 865 S. Figueroa Street, 10th Floor Los Angeles, California 90017 Telephone: 213-443-3000

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-and-

#### STRIS & MAHER LLP

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Colleen R. Smith (pro hac vice) 1717 K St NW Suite 900 Washington, DC 20006 Phone: (202) 800-5749 Email: cmith@stris.com

### **CERTIFICATE OF SERVICE**

I certify that, on September 12, 2025, a true and correct copy of the foregoing Monthly Fee Statement was served through the Court's Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco

Patricia B. Tomasco

### **Summary of Legal Fees for the Fee Period**

Matter #	Matter Description	Total Hours	<b>Total Fees</b>	80% of Fees
001	Midas Green Patent Litigation	257.4	\$232,210.00	\$185,768.00
007	Retention and Fee Applications	3.0	\$3,300.00	\$2,640.00
Total		260.4	\$235,510.00	\$188,408.00

### Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

### **Midas Green Patent Litigation**

Professional	Position with the	Year	Hourly	Total	<b>Total Compensation</b>
	Applicant	Admitted	Rate	Hours	
Elizabeth Brannen	Managing Partner	2001	1,250.00	75.20	\$94,000.00
Ken Halpern	Partner	1997	1,100.00	78.30	\$86,130.00
Peter Brody	Associate	2016	850.00	20.90	\$17,765.00
Tanya Tice	Staff Attorney	1989	525.00	30.00	\$15,750.00
Monica Viramontes	Senior Paralegal	N/A	425.00	.20	\$85.00
Andrew Atsalis	Litigation Fellow	N/A	350.00	47.30	\$16,555.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	5.50	\$1,925.00

### **Retention and Fee Applications**

Professional	Position with the	Year	Hourly	Total	<b>Total Compensation</b>
	Applicant	Admitted	Rate	Hours	_
Elizabeth Brannen	Managing Partner	2001	1,250.00	1.90	\$2,375.00
Victor O'Connell	Partner	2012	1,025.00	.80	\$820.00
Cynthia Huang	Litigation Fellow	N/A	350.00	.30	\$105.00

### **Summaries of Expenses for the Fee Period**

### **Midas Green Patent Litigation**

Expense	Amount
Travel	\$557.00
Printing services	\$701.81
Total	\$1,258.81



September 12, 2025

Rhodium Enterprises Invoice # 14680
Charles Topping Client # 00346
General Counsel and Secretary Matter # 001
chucktopping@rhdm.com

#### **INVOICE SUMMARY**

For professional services rendered through August 31, 2025

### RE: Midas Green Litigation

Total Professional Services Total Expenses Advanced	\$ 232,210.00 \$ 1,258.81
TOTAL THIS INVOICE	\$ 233,468.81
Previous Balance	\$ 168,189.11
TOTAL BALANCE DUE	\$ 401 657 92

Invoice # 14680 September 12, 2025

#### **PROFESSIONAL SERVICES**

Date	Tkpr	Description	Hours	Rate	Amount
8/01/25	EB	Prepare for upcoming hearing and initial meeting with expert regarding same (2.5); work on sanctions motion (0.4); correspond with client and Stris team regarding Midas subpoena and objections to same (0.1).	3.00	1250.00	3,750.00
8/01/25	KJH	Continue researching and drafting motion for sanctions against Midas, teleconference with E. Brannen regarding same and with A. Atsalis regarding supporting materials needed.	7.10	1100.00	7,810.00
8/01/25	NC	Attention to detailed tracking of deadlines and updating of case management materials in wake of recently served subpoenas.	.40	350.00	140.00
8/01/25	ASA	Prepare and finalize binder materials and correspond with print vendor to assist E. Brannen with preparations for August 22, 2025 hearing regarding motion for summary judgment (1.0); assist attorney K. Halpern format Rule 9011 motion (0.3).	1.00	350.00	350.00
8/02/25	EB	Correspond with K. Halpern and R. Harrington regarding sanctions motion (0.1); begin reviewing and commenting on same (0.6).	.70	1250.00	875.00
8/03/25	EB	Continue working on sanctions motion.	.80	1250.00	1,000.00
8/04/25	ЕВ	Prepare for (0.9) and attend (1.2) initial preparation meeting with expert; confer with TT regarding action items in support of hearing on objection to Midas proof of claim and estimation motion (0.2); correspond with K. Halpern and R. Harrington regarding sanctions motion and next steps in support of same (0.2); update client and co-counsel regarding damages expert (0.1); attend teleconference with K. Halpern and P. Brody regarding objections to Midas subpoena in the GRC case and potential motion to quash and sanctions motion (0.3); review client correspondence regarding subpoena (0.1); continue preparing for upcoming hearing on summary judgment motion (1.9).	4.90	1250.00	6,125.00

Date	Tkpr	Description	Hours	Rate	Amount
8/04/25	KJH	Attend teleconference with expert and E. Brannen regarding preparation for testimony at hearing Midas's patent infringement claims (1.2); attend teleconference with E. Brannen and P. Brody regarding response to Midas subpoenas on Cameron and Chase Blackmon (0.3).	1.50	1100.00	1,650.00
8/04/25	NC	Research regarding previously filed subpoena objections; correspond with E. Brannen regarding same.	.30	350.00	105.00
8/04/25	РВ	Teleconference with EB regarding response to Blackmon subpoenas	.30	850.00	255.00
8/04/25	TT	Prepare analysis and materials to assist E. Brannen with upcoming hearing.	6.00	525.00	3,150.00
8/05/25	ЕВ	Correspond with client regarding Midas v. GRC subpoena service and objections (0.1); continue preparing for hearing on motion to estimate and summary judgment on Midas claims (5.0); review and comment on draft Rule 11 letter (0.2); correspond with K. Halpern and R. Harrington regarding revisions to and next step in support of sanctions motion (0.1); correspond with client and damages expert regarding upcoming hearing (0.1).	5.50	1250.00	6,875.00
8/05/25	KJH	Correspond with E. Brannen and R. Harrington (Quinn) regarding revisions to draft motion for sanctions (0.1); review expert report on and correspond with E. Brannen, A. Atsalis, and P. Brody regarding images to be used for summary judgment hearing (0.3); research and begin drafting motion to quash Midas subpoena (2.4).	2.80	1100.00	3,080.00
8/05/25	РВ	Analyze potential exhibits for use at bankruptcy hearing.	.40	850.00	340.00
8/05/25	TT	Continue preparing materials to assist E. Brannen with upcoming hearing scheduled for August 22.	8.00	525.00	4,200.00
8/06/25	ЕВ	Correspond with R. Harrington regarding revisions to and next steps in support of sanctions motion and P. Tomasco regarding remote hearing sealing of proprietary exhibits (0.1); prepare for (1.4) and attend (1.5) preparation meeting for upcoming hearing with clients; begin revising direct examination materials in light of same (1.3); instruct Stris team members regarding action items in support of same (0.5).	4.80	1250.00	6,000.00

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Date	Tkpr	Description	Hours	Rate	Amount
8/06/25	KJH	Review draft motion for sanctions and correspond with R. Harrington and E. Brannen regarding revisions to, and plan for, same (0.3); research and draft motion to quash subpoenas to Chase and Cameron Blackmon (3).	3.30	1100.00	3,630.00
8/06/25	NC	Research regarding previous filings in Bankruptcy Court and corresponding filings in District Court to support hearing preparation.	2.20	350.00	770.00
8/06/25	ASA	Review and analyze expert reports, briefing, exhibits, produced documents, and internal records for specific material, including images of specific components of allegedly infringing device, requested by E. Brannen in preparation for presentation and witness testimony during August 22, 2025 hearing.	3.80	350.00	1,330.00
8/06/25	TT	Prepare materials to assist E. Brannen with upcoming hearing on August 22 (8.0).	8.00	525.00	4,200.00
8/07/25	ЕВ	Work on materials in support of client direct examination at upcoming hearing (1.7); continue preparing for hearing (2.0); review correspondence from R. Harrington regarding revised sanctions motion (0.1); correspond with B. Harrington and Stris team regarding exhibit and witness lists and sealing of exhibits (0.1).	3.90	1250.00	4,875.00
8/07/25	NC	Update E. Brannen regarding research into previous filings in Bankruptcy Court and corresponding filings in District Court to support hearing preparation.	.70	350.00	245.00
8/07/25	РВ	Draft response to subpoena to Chase Blackmon in Midas Green patent litigation.	.70	850.00	595.00
8/07/25	TT	Continue preparing materials to assist E. Brannen with upcoming hearing scheduled for August 22.	8.00	525.00	4,200.00
8/07/25	MV	Review correspondence from attorney E. Brannen related to contract with vendor, review previous correspondence with vendor and upload contract to iManage.	.20	425.00	85.00

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Date	Tkpr	Description	Hours	Rate	Amount
8/08/25	ЕВ	Review correspondence from counsel for Midas regarding subpoenas to Chase and Cameron Blackmon in GRC case and correspond with K. Halpern, P. Brody, A. Atsalis, and N. Capalbo regarding next steps in support of response, opposition, and potential motion to quash same (0.2); continue preparing for upcoming hearing including revising client materials, corresponding with client, and preparing expert materials (6.1).	6.30	1250.00	7,875.00
8/08/25	РВ	Revise draft responses and objections to Midas Green subpoena to Chase Blackmon.	.50	850.00	425.00
8/08/25	ASA	Assist P. Brody with drafting and formatting of objections to subpoenas to Cameron Blackmon and Chase Blackmon requesting documents from Midas Green Technologies v. Rhodium case and documents related to patent asserted by Midas.	1.50	350.00	525.00
8/10/25	EB	Correspond with P. Brody regarding revisions to objections to Midas subpoenas to Chase and Cameron Blackmon in GRC case.	.50	1250.00	625.00
8/11/25	ЕВ	Review and work on response to correspondence from counsel for Midas proposing amendments to proofs of claim in consultation with K. Halpern, P. Brody, P. Tomasco, and R. Harrington (0.7); communicate with K. Halpern and P. Brody regarding opposition to Chase and Cameron Blackmon subpoenas and motion to quash same (0.5); prepare for (1.5) and attend (1.8) further meeting with expert to prepare for upcoming hearing.	4.50	1250.00	5,625.00
8/11/25	KJH	Prepare for (0.2) and attend (1.8) teleconference with E. Brannen and expert to prepare for 8/22 hearing on Midas's proof of claim; attend teleconference with E. Brannen and P. Brody regarding Midas subpoenas to Blackmons (0.5); research facts and law and draft motion to quash Midas subpoenas and correspond with A. Atsalis regarding record research needed for same (8.2).	10.70	1100.00	11,770.00
8/11/25	NC	Assist A. Atsalis with objections to Blackmon subpoena.	.10	350.00	35.00

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Date	Tkpr	Description	Hours	Rate	Amount
8/11/25	РВ	Revise response to subpoena to Chase Blackmon and prepare response to subpoena to Cameron Blackmon (0.8); communicate with E. Brannen and K. Halpern regarding same (0.6).	1.40	850.00	1,190.00
8/11/25	ASA	Assist K. Halpern with drafting of motion to quash by analyzing discovery requests, deposition transcripts, and deposition notices served in Midas Green v. Rhodium matter to identify duplicative content in subpoenas served on Chase Blackmon and Cameron Blackmon (2.8); assist P. Brody and E. Brannen with preparation of objections to subpoenas and motion to quash by conducting legal research into relevant granted motions by Judge Gilliland and in the Western District of Texas (3.3).	6.10	350.00	2,135.00
8/12/25	ЕВ	Work with expert, client, and co-counsel to respond to rescheduling correspondence from clerk (0.4); continue preparing for same (1.3); correspond with counsel for Midas in consultation with co-counsel and client regarding basis for objection to proposed amendments (0.5); revise objections to Midas subpoena to Chase and Cameron Blackmon in GRC case, serve, and correspond with counsel for Midas regarding same (1.4); review draft motion to quash (0.2); correspond with K. Halpern and A. Atsalis regarding initial revisions to same (0.1).	3.90	1250.00	4,875.00
8/12/25	KJH	Complete draft motion to quash subpoenas to Chase and Cameron Blackmon and correspond with E. Brannen and A. Atsalis regarding same.	4.80	1100.00	5,280.00
8/12/25	NC	Implement further K. Halpern edits to motion to quash subpoena; correspond with K. Halpern regarding same.	.80	350.00	280.00
8/12/25	ASA	Work on motion to quash subpoena to Chase Blackmon and Cameron Blackmon at request of K. Halpern (0.4); assist E. Brannen and P. Brody with finalization of objections and responses to subpoenas served on Cameron Blackmon and Chase Blackmon by Midas Green (1.8).	2.20	350.00	770.00

Date	Tkpr	Description	Hours	Rate	Amount
8/13/25	ЕВ	Continue working on motion to quash subpoenas to Cameron and Chase Blackmon in GRC case (1.1); review and analyze Midas opposition briefs to estimation and summary judgment motions (1.0); correspond with Stris team and R. Harrington regarding research and action items in support of replies to same (0.2); begin working on reply in support of summary judgment motion (0.8); attend meet and confer teleconference with K. Halpern and opposing counsel H. Pogorzelski regarding subpoenas to Cameron and Chase Blackmon in GRC case (0.5); attention to resulting action items including client update and response to correspondence from opposing counsel (0.3); attend teleconference with K. Halpern, P. Brody, R. Harrington, and A. Atsalis regarding Midas oppositions and reply briefs (0.7); continue preparing for hearing on same including correspondence with clients and experts (0.6).	5.20	1250.00	6,500.00
8/13/25	KJH	Review Midas opposition to motion for summary judgment (0.5); teleconference with E. Brannen, P. Brody and R. Harrington regarding Midas opposition to motion for summary judgment and planning for reply brief (0.7); revise draft motion to quash and research law and confer with E. Brannen and A. Atsalis regarding same (2.2); attend meet and confer teleconference with E. Brannen and H. Pogorzelski regarding meet and confer on subpoenas to Blackmon brothers (0.5); draft patent section of reply brief in support of motion for summary judgment (3.2).	7.10	1100.00	7,810.00
8/13/25	NC	No Charge - Travel research regarding flights and hotel rooms for upcoming hearing; correspond with E. Brannen and expert regarding same	1.20	350.00	N/C
8/13/25	РВ	Communicate with E. Brannen regarding action items (0.2); revise draft motion to quash (1.7); teleconference with E. Brannen, K. Halpern, A. Atsalis, and R. Harrington [Quinn] regarding replies in support of motions (0.7).	2.60	850.00	2,210.00

Date	Tkpr	Description	Hours	Rate	Amount
8/13/25	ASA	Assist K. Halpern and E. Brannen with finalization of motion to quash by insert citations to supporting exhibits (0.8); proofread and cite check motion to quash (1.6); draft declaration in support of motion to quash at request of E. Brannen (1.2); prepare documents for use as exhibits in support of motion to quash (1.5); teleconference with E. Brannen, K. Halpern, P. Brody and R. Harrington regarding Midas opposition to motion for summary judgment and planning for reply brief (0.7); organize sealed opposition motions and supporting material filed by Midas Green and circulate with team and client at request of E. Brannen (0.2).	6.00	350.00	2,100.00
8/14/25	EB	Prepare for (0.2) and attend (0.4) client teleconference regarding high priority action items; continue preparing for hearing including revising expert materials and assessing Midas opposition points to refute with key evidence and testimony (3.2).	3.80	1250.00	4,750.00
8/14/25	KJH	Draft patent section of reply brief in support of motion for summary judgment.	6.30	1100.00	6,930.00
8/14/25	NC	No Charge - Attend to hotel and flight bookings for clients and expert.	3.40	350.00	N/C
8/14/25	РВ	Draft reply in support of motion for summary judgment.	5.80	850.00	4,930.00
8/14/25	ASA	Analyze Midas Green's opposition to motion for summary judgment in order to assist with drafting of reply (0.6); file correspondence regarding narrowing of subpoenas to assist E. Brannen, P. Brody, and K. Halpern's with edits to motion to quash (0.2); calendar updated hearing date of September 23, 2025 (0.1).	.90	350.00	315.00
8/15/25	EB	Correspond with expert and K. Halpern regarding hearing preparation.	.10	1250.00	125.00
8/15/25	KJH	Draft patent section of reply in support of motion for summary judgment and research law in support of same.	7.70	1100.00	8,470.00
8/15/25	NC	Compile and track recent filings for attorney analysis.	.40	350.00	140.00
8/15/25	РВ	Revise portions of draft reply in support of motion for summary judgment.	2.00	850.00	1,700.00
8/16/25	EB	Review, analyze, and begin revising reply in support of summary judgment motion.	1.10	1250.00	1,375.00

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Date	Tkpr	Description	Hours	Rate	Amount
8/16/25	KJH	Complete initial draft of patent law section of reply in support of motion for summary judgment and research law in support of same.	5.20	1100.00	5,720.00
8/17/25	EB	Revise summary judgment reply (2.3); correspond with K. Halpern, P. Brody, and A. Atsalis regarding next steps in support of same (0.1).	2.40	1250.00	3,000.00
8/17/25	РВ	Revise draft reply in support of motion for summary judgment.	.90	850.00	765.00
8/18/25	EB	Continue working on reply in support of summary judgment motion (4.7); advise K. Halpern regarding further revisions to same (0.1).	4.80	1250.00	6,000.00
8/18/25	KJH	Conduct additional research in support of and further revise reply brief in support of summary judgment motion including to implement E. Brannen comments.	6.90	1100.00	7,590.00
8/18/25	РВ	Revise draft reply in support of motion for summary judgment.	1.20	850.00	1,020.00
8/18/25	ASA	Assist E. Brannen, K. Halpern, and P. Brody with edits to Debtors' Reply in Support of Motion for Summary Judgment by revising citations, formatting and phrasing of draft pursuant to attorney requests.	3.20	350.00	1,120.00
8/19/25	EB	Continue revising reply in support of summary judgment motion including to incorporate comments from clients and co-counsel (3.3); review and propose revisions to draft estimation reply (0.9); correspond with K. Halpern and R. Harrington regarding further revisions to same (0.1).	4.30	1250.00	5,375.00
8/19/25	KJH	Research case law and propose revisions to draft reply in support of motion to estimate (1.0); review and revise draft reply in support of summary judgment (1.4).	2.40	1100.00	2,640.00
8/19/25	ASA	Cite-check of and revise Debtors' Reply in Support of Motion for Summary Judgment at request of E. Brannen (4.8); assist with iterative edits and finalization of same and supporting documents (2.8).	7.60	350.00	2,660.00

Date	Tkpr	Description	Hours	Rate	Amount
8/20/25	EB	Attention to potential motion to quash subpoenas to Cameron and Chase Blackmon regarding Midas subpoena in GRC litigation given extended deadline and failure to narrow subpoena (0.4); communicate with K. Halpern and P. Brody regarding same (0.1).	.50	1250.00	625.00
8/21/25	EB	Correspond with (0.2) and attend teleconference with (0.5) K. Halpern, clients, and co-counsel regarding Midas position with respect to subpoenas to Cameron and Chase Blackmon; advise K. Halpern, P. Brody, and A. Atsalis regarding revisions to motion to quash (0.3); further revise same and supporting documents (0.9); continue preparing expert materials in advance of upcoming teleconference to prepare for hearing (2.0).	3.90	1250.00	4,875.00
8/21/25	KJH	Attend teleconference with E. Brannen,	5.30	1100.00	5,830.00
		response to Midas meet-and-confer email relating to subpoenas to Blackmons (0.5); research record and correspond with E. Brannen, P. Brody, and A. Atsalis regarding prior testimony of Chase Blackmon on GRC-related topics (0.5); review, comment on, research law for, and propose edits to draft motion to quash subpoena (3.3); review key points for testimony and '457 patent to extract helpful material (1).			
8/21/25	NC	Correspond with E. Brannen, , Patty Tomasco, and Rachel Harrington regarding upcoming meeting.	.20	350.00	70.00
8/21/25	РВ	Revise draft motion to quash including to implement comments from E. Brannen.	2.80	850.00	2,380.00
8/21/25	ASA	Assist E. Brannen, K. Halpern, and P. Brody with finalization of motion to quash subpoenas by editing, proofreading, inserting citations, and cite-checking iterative changes to draft (3.8); excerpt and highlight case materials for use as exhibits pursuant to local rules (1.2); draft revised declaration of to ensure accurate listing of Rhodium entities and additional exhibits (1.1); coordinate with E. Brannen and implement final edits prior to filing (0.6); file motion to quash and supporting exhibits via ECF (0.5).	6.60	350.00	2,310.00

Date	Tkpr	Description	Hours	Rate	Amount
8/22/25	EB	Prepare for upcoming teleconference with expert (1.0); correspond with expert, K. Halpern, P. Brody, and A. Atsalis regarding same and related action items (0.1); attend teleconference with K. Halpern, P. Brody, and A. Atsalis regarding same (0.7).	1.80	1250.00	2,250.00
8/22/25	РВ	Attend portion of teleconference with E. Brannen, K. Halpern, and A. Atsalis regarding hearing preparation action items.	.50	850.00	425.00
8/22/25	ASA	Attend meeting with E. Brannen, K. Halpern, and P. Brody regarding preparation and support for upcoming expert meeting (0.7); organize case management and detailed tracking materials to reflect recent case activity and ensure attorney organization in advance of upcoming hearing (0.1).	.80	350.00	280.00
8/23/25	KJH	Review asserted '457 patent and propose additions to expert hearing testimony.	1.00	1100.00	1,100.00
8/23/25	KJH	Attend teleconference with E. Brannen, P. Brody and A. Atsalis regarding planning for Rhodium summary judgment hearing and outstanding tasks (0.5); draft correspondence with Midas counsel H. Pogorzelski regarding motion to quash subpoena (0.9).	1.40	1100.00	1,540.00
8/25/25	EB	Continue preparing for hearing including upcoming preparation meeting with expert (1.0); correspond with K. Halpern, P. Brody, and A. Atsalis regarding updates to materials in support of same (0.2).	1.20	1250.00	1,500.00
8/25/25	РВ	Revise draft engagement letter for damages expert J. Saitz.	.50	850.00	425.00
8/26/25	EB	Continue preparing for (1.0) and attend (1.7) hearing preparation meeting with K. Halpern, P. Brody, A. Atsalis, and expert.	2.70	1250.00	3,375.00
8/26/25	KJH	Attend teleconference with expert expert, E. Brannen, P. Brody, and A. Atsalis regarding preparation for summary judgment and evidentiary hearing.	1.70	1100.00	1,870.00
8/26/25	ASA	Attend hearing preparation meeting with E. Brannen, K. Halpern, P. Brody, A. Atsalis, and expert (1.7); prepare presentation and assist with edits to motion for summary judgment presentation at request of E. Brannen (2.2).	3.90	350.00	1,365.00

Date	Tkpr	Description	Hours	Rate	Amount
8/27/25	ЕВ	Review and correspond with clients and co-counsel regarding narrowed Midas GRC subpoena proposal (0.1); attend teleconference with P. Brody and clients to discuss response to same (0.3); correspond with (0.1) and attend meet and confer teleconference with (0.5) K. Halpern and counsel to Midas in GRC case concerning same (0.5); attention to resulting action items including client update and correspondence with opposing counsel to confirm extension (0.1); prepare for next meeting with expert (0.5).	2.00	1250.00	2,500.00
8/27/25	KJH	Attend teleconference with E. Brannen and Midas counsel H. Pogorzelski to meet and confer about Midas subpoenas to Chase and Cameron Blackmon (0.5); review Pokharna infringement report for doctrine-of-equivalents arguments (1.1).	1.60	1100.00	1,760.00
8/27/25	РВ	Attend teleconference with clients and E. Brannen regarding response to Midas subpoena in GRC litigation.	.30	850.00	255.00
8/28/25	EB	Correspond with expert (0.1); attend teleconference with K. Halpern, P. Brody, and A. Atsalis to revise materials for expert direct examination (1.0).	1.10	1250.00	1,375.00
8/28/25	KJH	Attend teleconference with E. Brannen, P. Brody and A. Atsalis regarding direct examination hearing (1); correspond with A. Atsalis regarding scheduling (0.1); confer with A. Atsalis regarding edits to (0.4).	1.50	1100.00	1,650.00
8/28/25	РВ	Teleconference with E. Brannen, K. Halpern, and A. Atsalis regarding preparation for hearing on motion for summary judgment.	1.00	850.00	850.00
8/28/25	ASA	Attend teleconference with E. Brannen, K. Halpern, and P. Brody regarding direct examination hearing (1); correspond with K. Halpern regarding scheduling (0.1); confer with K. Halpern regarding edits to direct exam materials (0.4); edit same as directed by K. Halpern (0.6)	2.10	350.00	735.00
8/29/25	ЕВ	Review Midas motion to amend claim and related correspondence with co-counsel (0.2); correspond with K. Halpern, P. Brody, and A. Atsalis regarding high priority action items (0.2); continue preparing for hearing on opposition to Midas claim (1.1).	1.50	1250.00	1,875.00

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Date	Tkpr	Description	Hours	Rate	Amount
8/29/25	NC	Work on upcoming hearing materials for E. Brannen.	.40	350.00	140.00
8/29/25	ASA	Assist P. Brody with analysis of District Court Motion to Exclude (0.2); assist E. Brannen with analysis of Midas Green's motion for leave to file amended proof of claims (0.3); calculate and perform detailed tracking of deadlines triggered by Midas Green's motion and calendar deadlines related to subpoenas to Cameron and Chase Blackmon (0.2); continue edits to direct examination materials and circulate with E. Brannen, K. Halpern, and P. Brody (0.9).	1.60	350.00	560.00

#### **TOTAL PROFESSIONAL SERVICES**

\$ 232,210.00

#### **SUMMARY OF PROFESSIONAL SERVICES**

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	75.20	1,250.00	94,000.00
Ken Halpern	KJH	Partner	78.30	1,100.00	86,130.00
Peter Brody	РВ	Associate	20.90	850.00	17,765.00
Tanya Tice	TT	Staff Attorney	30.00	525.00	15,750.00
Monica Viramontes	MV	Sr Paralegal	.20	425.00	85.00
Andrew Atsalis	ASA	Fellow	47.30	350.00	16,555.00
Nicholas Capalbo	NC	Fellow	5.50	350.00	1,925.00
Total			257.40		\$ 232,210.00

#### **EXPENSES ADVANCED**

Date Task	Description	Amount
8/12/25	Vendor fee for preparation of briefing binders.	701.81
8/15/25	EB airfare for 09/23 hearing.	557.00
	TOTAL EXPENSES ADVANCED	\$ 1,258.81
	TOTAL THIS INVOICE	\$ 233,468.81

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#### **OUTSTANDING INVOICES**

Invoice	Date	Total	Payments	Balance
14614	7/16/25	83,677.36	67,905.37	15,771.99
14650	8/07/25	152,417.12	.00	152,417.12
	Previous Balance			
	Balance Due This Invoice			\$ 233,468.81
	TOTAL	. BALANCE DUE		\$ 401,657.92

#### AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$ .00	\$ 168,189.11	\$.00	\$ .00	\$ .00	\$ 168,189.11



September 12, 2025

Rhodium Enterprises Invoice # 14681
Charles Topping Client # 00346
General Counsel and Secretary Matter # 007
chucktopping@rhdm.com

#### **INVOICE SUMMARY**

For professional services rendered through August 31, 2025

### **RE:** Retention and Fee Applications

Total Professional Services Total Expenses Advanced	\$ 3,300.00 \$ .00
TOTAL THIS INVOICE	\$ 3,300.00
Previous Balance	\$ 7,268.00
TOTAL BALANCE DUF	\$ 10.568.00

Invoice # 14681 September 12, 2025

#### **PROFESSIONAL SERVICES**

Date	Tkpr	Description	Hours	Rate	Amount
8/05/25	EB	Begin working on portions of monthly fee statement.	.40	1250.00	500.00
8/06/25	EB	Continue working on portions of monthly fee statement.	.60	1250.00	750.00
8/07/25	EB	Continue working on portions of monthly fee statement.	.90	1250.00	1,125.00
8/07/25	NC	Assist E. Brannen in preparation of monthly fee statements.	.30	350.00	105.00
8/19/25	VO	Prepare monthly fee application (0.7); emails with B. Howell and to serve application (0.1).	.80	1025.00	820.00

#### **TOTAL PROFESSIONAL SERVICES**

\$ 3,300.00

#### **SUMMARY OF PROFESSIONAL SERVICES**

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	1.90	1,250.00	2,375.00
Victor O'Connell	VO	Partner	.80	1,025.00	820.00
Nicholas Capalbo	NC	Fellow	.30	350.00	105.00
Total			3.00		\$ 3,300.00

**TOTAL THIS INVOICE** 

\$ 3,300.00

Invoice # 14681 September 12, 2025

#### **OUTSTANDING INVOICES**

Invoice	Date	Total	Payments	Balance
14615	7/16/25	7,227.50	5,782.00	1,445.50
14651	8/07/25	5,822.50	.00	5,822.50
	Previous E	Balance		\$ 7,268.00
	Balance D	Balance Due This Invoice		
	TOTAL BA	TOTAL BALANCE DUE		

#### **AGED ACCOUNTS RECEIVABLE**

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$ .00	\$ 7,268.00	\$ .00	\$ .00	\$ .00	\$ 7,268.00