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)
	§	

DECLARATION OF CHARLES R. TOPPING IN SUPPORT OF DEBTORS' MOTION FOR SANCTIONS RELATING TO CLAIM NUMBERS 004, 062, AND 068-072 FILED BY MIDAS GREEN TECHNOLOGIES LLC (ECF NO. 1602) AS DIRECTED BY THE COURT'S SEPTEMBER 5, 2025 SCHEDULING ORDER (ECF NO. 1609)

I, Charles R. Topping, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am General Counsel and Secretary of Rhodium Enterprises, Inc., which directly or indirectly manages other Rhodium-family entities, including but not limited to Rhodium Renewables LLC, Rhodium 30MW LLC, Rhodium JV LLC; Rhodium 2.0 LLC, Rhodium 10MW LLC, Rhodium Encore LLC, Jordan HPC LLC, and Air HPC LLC (collectively referred to as "Rhodium" herein). Except for any matters stated to be based upon information and belief, I have either personal knowledge of the facts set forth below or knowledge based on my review of records kept and maintained by Rhodium in the ordinary course of its business, and if called as a witness, I could and would competently attest to them.

[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.

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2. From the inception of the case filed by Midas Green Technologies, LLC in district court in 2022 purporting to accuse Rhodium of patent infringement (*Midas Green Technologies, LLC v. Rhodium Enterprises, Inc. et al.*, Case No. 6:2022-CV-00050-ADA (W.D. Tex. 2022)) through July of 2023, Rhodium paid no less than $2.5 million in fees to its prior patent litigation counsel at Kirkland & Ellis and $81,778.87 in costs.

3. From May of 2023 through July of 2024, Rhodium paid an additional $2,596,065.00 in fees to Stris & Maher LLP ("Stris") for litigating the case to victory in district court and an additional $320,376.00 in costs.

4. From November 2024 to August 31, 2025, Rhodium incurred the following additional amounts to address the Midas Green claims asserted in these Chapter 11 proceedings:

a. Fees to Stris (reflected and billed in Exhibits A-L and one forthcoming invoice for August services): $527,975.79;

b. Costs (reflected and billed in Exhibits A-L and one forthcoming invoice for August services): $6,103.43; and

c. Fees to Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn Emanuel") (reflected in the fee submissions submitted by Quinn Emanuel and summarized in Exhibit M): $137,059.50.

5. On information and belief, I am informed and believe that to date in September, Rhodium has incurred approximately $65,500.00 in fees and costs to Stris and Quinn Emanuel and $19,350 in expert and other costs.

6. On information and belief, I am informed and believe that Rhodium will incur additional fees between $235,000.00 and $300,000.00 to Stris and Quinn Emanuel and between an additional $22,000.00 and $35,000.00 in expert and other costs to address the Midas Green claims in these proceedings leading up to the September 23, 2025, hearing. Rhodium will request the opportunity to supplement its damages claim based upon these actual additional fees and costs once they are incurred.

7. The fees Rhodium paid to Kirkland & Ellis and Stris in connection with the Midas Green district court litigation were discounted, and it is my opinion that the fees paid to Kirkland & Ellis and Stris to litigate the Midas Green claims in district court have been reasonable, and the fees paid to Stris and Quinn Emanuel to litigate the Midas Green claim in these chapter 11 proceedings have been reasonable.

8. As reflected above and in the exhibits and without taking into account any supplementation that may be permitted, Rhodium has incurred at least $5,498,220.00 in damages due to Midas Green's pursuit of its baseless claim in district court and an additional no less than $755,988.72 in damages due to its continued pursuit of the baseless claim in these proceedings, for a total to-date of $6,254,208.72.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: September 12, 2025

Respectfully submitted,

/s/ Charles R. Topping
Charles R. Topping

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 FIRST MONTHLY FEE STATEMENT FOR THE PERIOD AUGUST 26, 2024, THROUGH SEPTEMBER 30, 2024

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 26, 2024 through September 30, 2024 (the "First Monthly Fee Statement").[2]

Stris & Maher seeks payment of interim compensation in the total amount of $1,021,415.40 (80% of the services rendered), plus $44,263.50 (100% of the interim expenses

[1] 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.

[2] *See* Interim Compensation Order, ECF No. 264 at n.3 ("For the avoidance of doubt, [Stris & Maher LLP] may file and serve . . . a combined Monthly Statement for the months of August 2024 and September 2024"). Stris & Maher received partial payment for its August services from Debtors in August. This Monthly Statement seeks payment only for the unpaid portion of Stris & Maher's fees and expenses in August incurred after the Petition Date.

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.

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 First 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 (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 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;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (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 (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke

(mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 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 (ha.nguyen@usdoj.gov), 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 (after applying, for the Tarrant County Litigation, a 10% discount) 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 6th day of November, 2024.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
Patricia B. Tomasco (SBN 01797600)
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-and-

STRIS & MAHER LLP

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Victor O'Connell (pro hac vice)
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408 W. 11th Street, 5th Floor
Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on November 6, 2024, 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

EXHIBIT 1
Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	1.4	$1,515.00	$1,212.00
002	Temple Green Data Matter	28.6	$22,490.00	$17,992.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	1860.5	$1,182,372.50	$945,898.00
006	Tarrant County Litigation	32.2	$23,226.75[3]	$18,581.40
007	Retention and Fee Applications	54.1	$47,165.00	$37,732.00
Total		1976.8	$1,276,769.25	$1,021,415.40

[3] Stris & Maher has agreed to provide a 10% discount in the Tarrant County Litigation, resulting in a discount from $25,807.50 to $23,226.75 for the period August 26, 2024 through September 30, 2024. *See* Order Granting Application for Order Authorizing the Retention and Employment of Stris & Maher LLP as Special Litigation Counsel, ECF No. 252 at ¶ 2. This discount is reflected in the accompanying text.

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,100.00	0.9	$990.00
Bridget Asay	Partner	1997	$1,050.00	0.5	$525.00

Temple Green Data Matter

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Victor O'Connell	Partner	2012	$875.00	11.7	$10,237.50
Colleen Smith	Associate	2015	$725.00	16.9	$12,252.50

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Peter K. Stris	Founding Partner	2001	$1,250.00	21.1	$26,375.00
Elizabeth Brannen	Managing Partner	2001	$1,100.00	26.3	28,930.00
Bridget Asay	Partner	1997	$1,050.00	124.2	$130,410.00
Victor O'Connell	Partner	2012	$875.00	24.5	$21,437.50
John Stokes	Partner	2016	$875.00	255.4	$223,475.00
Colleen Smith	Associate	2015	$725.00	104.9	$76,052.50
Peter Brody	Associate	2016	$725.00	171.9	$124,627.50
Sarah Rahimi	Associate	2019	$650.00	104.3	$67,795.00
Helen Marsh	Associate	2024	$600.00	157.4	$94,440.00
Tanya Tice	Discovery Associate	1989	$480.00	29.4	$14,112.00
Michele Jarrouj	Discovery Associate	2021	$480.00	27.7	$13,296.00
Pascale Nyby	Discovery Associate	2009	$480.00	146	$70,080.00
Venu Alagh	Discovery Associate	2003	$480.00	156.5	$75,120.00
Holly Sadlon	Discovery Associate	1994	$480.00	126.1	$60,528.00
Fatima Fofana	Discovery Associate	2012	$480.00	177.8	$85,344.00
Monica Viramontes	Senior Paralegal	N/A	$400.00	41	$16,400.00
Andrea Atsalis	Litigation Fellow	N/A	$325.00	25.4	$8,255.00
Cynthia Huang	Litigation Fellow	N/A	$325.00	88.5	$28,762.50
Jaida Hodge-Adams	Litigation Fellow	N/A	$325.00	52.1	$16,932.50

Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate[4]	Total Hours	Total Compensation
Bridget Asay	Partner	1997	$945.00	7.7	$8,085.00
John Stokes	Partner	2016	$787.50	16.8	$14,700.00
Sarah Rahimi	Associate	2019	$585.00	1.6	$1,040.00
Jaida Hodge-Adams	Litigation Fellow	N/A	$292.50	6.1	$1,982.50

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Peter K. Stris	Founding Partner	2001	$1,250.00	9.2	$11,500.00
Elizabeth Brannen	Managing Partner	2001	$1,100.00	1.7	$1,870.00
Victor O'Connell	Partner	2012	$875.00	13.7	$11,987.50
John Stokes	Partner	2016	$875.00	2.8	$2,450.00
Colleen Smith	Associate	2015	$725.00	19.2	$13,920.00
Peter Brody	Associate	2016	$725.00	7.5	$5,437.50

[4] Stris & Maher has agreed to provide a 10% discount in the Tarrant County Litigation, which is reflected as a rate discount in this column. *See* Order Granting Application for Order Authorizing the Retention and Employment of Stris & Maher LLP as Special Litigation Counsel, ECF No. 252 at ¶ 2.

EXHIBIT 3
Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
JND eDiscovery hosting	$7,530.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
StoneTurn professional services	$12,637.50
Logikcull eDiscovery hosting	$2,646.00
Peregrine Consultants, LLC professional services	$21,450.00
Total	$36,773.50

EXHIBIT 4

Stris

November 1, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14247
Client # 00346
Matter # 002

INVOICE SUMMARY

For professional services rendered through August 31, 2024

RE: Temple Green Data Litigation

Total Professional Services	$ 7,190.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 7,190.00**

Electronic Invoice

Invoice # 14247 November 1, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
8/29/24	VO	Confer with CS regarding preparation of letter responding to Second Notice of Default (0.1); correspond with Rhodium personnel including [redacted] regarding new correspondence from M. Simmons raising various issues (0.2); prepare draft response to M. Simmons regarding same (1.4); correspond with CS regarding revisions to same (0.2).	1.90	875.00	1,662.50
8/29/24	CS	Review and analyze letter from Landlord regarding alleged second breach of lease (0.4); review and analyze correspondence from Rhodium personnel regarding allegations (0.3); draft portions of response letter (2.1); review and edit draft email response to M. Simmons regarding other outstanding items (0.3).	3.10	725.00	2,247.50
8/30/24	VO	Review, revise, and further draft letter responding to alleged Second Notice of Default (3.2); confer with CS and Rhodium personnel regarding same (0.3).	3.50	875.00	3,062.50
8/30/24	CS	Review and edit response letter regarding alleged second breach.	.30	725.00	217.50
		TOTAL PROFESSIONAL SERVICES			**$ 7,190.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Victor O'Connell	VO	Partner	5.40	875.00	4,725.00
Colleen Smith	CS	Associate	3.40	725.00	2,465.00
Total			**8.80**		**$ 7,190.00**

TOTAL THIS INVOICE **$ 7,190.00**

Stris

November 1, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14249
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through August 31, 2024

RE: Whinstone Litigation

Total Professional Services	$ 79,868.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 79,868.00**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Invoice # 14249 November 1, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
8/28/24	PS	Review draft documents and confer with BA, VO, and JS regarding strategy and next steps.	.70	1250.00	875.00
8/28/24	BA	Review and correspond with bankruptcy counsel regarding edits to first day declaration (.9); correspond with A. Swartz regarding expert retention (0.1); supervise CH in collecting information necessary for bankruptcy court pro hac motions (0.3); confer with PB regarding status and high priority action items including witness preparation (0.2); correspond with JS and bankruptcy counsel regarding materials for witness preparation (0.4); begin preparing materials for first day hearing witness preparation (1.8); confer with PS and EB regarding damages expert (0.1); confer with PS and JS regarding strategy for proposed schedule for motion to assume, including discovery needs and timing (0.4).	4.20	1050.00	4,410.00
8/28/24	VO	Review and analyze bankruptcy filings provided by Quinn Emanuel (including First Day Declaration, Insurance Motion, Cash Management Motion, DIP Motion, DIP Declaration, Cash Collateral Motion, Application to Retain Verita as Claims Agent, Matrix Motion, Schedules Motion, and Supplemental Joint Administration Motion) (3.8); confer with PS and JS regarding revisions to same (0.5); correspond with Quinn Emanuel attorneys including P. Tomasco regarding same (0.2); review correspondence between P. Tomasco and M. Rosenblatt (0.1).	4.60	875.00	4,025.00
8/28/24	JS	Review and revise first day motions, declarations, and supporting documents (6.5); prepare preparation materials for first day witnesses (6.4).	12.90	875.00	11,287.50
8/28/24	PB	Attend daily document review team quality-control meeting (0.2); review bankruptcy filings (0.7); assist BA and JS with preparation of bankruptcy-related action items including witness preparation materials (0.5).	1.40	725.00	1,015.00
8/28/24	CHH	Collect and summarize attorney information for BA, JS, VO, HM, and PB for bankruptcy action pro hac vice filings (0.3); attend daily review check-in with PB, A. Swartz (Lehotsky), and discovery associates PN and MJ (0.2).	.50	325.00	162.50

Stris & Maher LLP

Invoice # 14249 November 1, 2024

Date	Tkpr	Description	Hours	Rate	Amount
8/28/24	JH	File various documents in arbitration and state court dockets for BA (0.3); review last week's correspondence and filings (3.0).	3.30	325.00	1,072.50
8/28/24	MJ	Attend document review daily team meeting (0.2); review assigned document batches.	1.90	480.00	912.00
8/28/24	PNY	Attend document review daily team meeting (0.2); review assigned document batches.	6.00	480.00	2,880.00
8/29/24	BA	Prepare for and participate in portion of preparatory session for first day hearing witness (1.7); update JS, PB, and W. Thompson regarding same and convey additional preparation materials to bankruptcy counsel (0.2); confer with JS regarding strategy and action items including motion to assume and witness preparation (0.2); confer with JS, PB, A. Swartz, and W. Thompson regarding schedule for motion to assume and correspond with bankruptcy counsel regarding same (0.9).	3.00	1050.00	3,150.00
8/29/24	JS	Prepare for and attend preparation session for first day hearing witness (2.3); review and evaluate proposed schedule for litigating motion to assume and confer with co-counsel regarding same (1.3).	3.60	875.00	3,150.00
8/29/24	CHH	Review instructions from PB regarding [redacted] for document review and implement same on review platform.	.10	325.00	32.50
8/29/24	MJ	Review additional assigned document batches.	3.80	480.00	1,824.00
8/29/24	PNY	Review additional assigned document batches.	8.00	480.00	3,840.00
8/30/24	EB	Begin reviewing and analyzing Whinstone bankruptcy discovery requests (0.3); attention to case management and staffing (0.6).	.90	1100.00	990.00
8/30/24	BA	Attend portion of bankruptcy first day hearing (2.7); confer with JS and correspond with JS and PB regarding high priority action items and schedule following status conference (0.5); review proposed schedule for motion to assume contracts and propose potential revisions to same (0.3); evaluate and confer with Stris and LKC team regarding proposed schedule, discovery, and strategy for motion to assume (1.2).	4.70	1050.00	4,935.00

Invoice # 14249 November 1, 2024

Date	Tkpr	Description	Hours	Rate	Amount
8/30/24	VO	Review team correspondence regarding hearing summary (0.1); confer with [redacted] regarding hearing and next steps (0.8); confer with PB regarding discovery planning (0.3); confer with PS, EB, and JS regarding same (0.6).	1.80	875.00	1,575.00
8/30/24	JS	Prepare for and attend first day hearing (3.6); evaluate scheduling, discovery status and next steps, and expert retention given likely schedule (5.5); confer with Stris and LKC teams regarding same (2.9); evaluate staffing needs in light of timeline (1.1).	13.10	875.00	11,462.50
8/30/24	PB	Review and analyze documents for potential production and to advise review team (1.1); attend first-day hearing in bankruptcy litigation (2.8); confer with Stris and LKC teams regarding bankruptcy litigation and upcoming document review (2.0); analyze strategy and materials for upcoming document review and discovery responses (2.8).	8.70	725.00	6,307.50
8/30/24	MJ	Review assigned document batches.	1.90	480.00	912.00
8/30/24	PNY	Review assigned document batches.	8.00	480.00	3,840.00
8/31/24	EB	Continue reviewing and analyzing Whinstone bankruptcy discovery requests (0.1); correspond with Stris and LKC teams regarding scope of same (0.1); attend portion of teleconference with BA, JS, VO, J. Cohn, T. Griffin, W. Thompson, P. Tomasco, and K. Hutchins regarding status and high priority strategic and discovery-related action items (1.0); review proposed scheduling order and correspond with BA regarding potential adjustment to same (0.1); attention to case management (0.2); correspond with [redacted] regarding engagement of ERCOT expert (0.1).	1.60	1100.00	1,760.00
8/31/24	BA	Participate in portion of teleconference with litigation team and bankruptcy counsel regarding strategy, discovery, and case planning (1.0); confer with EB, JS, and J. Cohn regarding revisions to proposed scheduling order and implement same (0.3); correspond with EB, JS, and VO regarding discovery responses and document review (0.2).	1.50	1050.00	1,575.00
8/31/24	VO	Attend teleconference with LKC, Quinn, and Stris teams regarding strategy for litigation and discovery (1.1); confer with JS regarding discovery planning (0.2); attention to case management (0.5).	1.80	875.00	1,575.00

Stris & Maher LLP

Invoice # 14249 November 1, 2024

Date	Tkpr	Description	Hours	Rate	Amount
8/31/24	JS	Review Whinstone RFPs and evaluate potential responses (3.1); prepare for and attend planning call with co-counsel (1.6); review Whinstone production for potential hot documents (2.5).	7.20	875.00	6,300.00

TOTAL PROFESSIONAL SERVICES **$ 79,868.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	.70	1,250.00	875.00
Elizabeth Brannen	EB	Partner	2.50	1,100.00	2,750.00
Bridget Asay	BA	Partner	13.40	1,050.00	14,070.00
Victor O'Connell	VO	Partner	8.20	875.00	7,175.00
John Stokes	JS	Partner	36.80	875.00	32,200.00
Peter Brody	PB	Associate	10.10	725.00	7,322.50
Michele Jarrouj	MJ	Discovery Associate	7.60	480.00	3,648.00
Pascale Nyby	PNY	Discovery Associate	22.00	480.00	10,560.00
Cynthia Huang	CHH	Fellow	.60	325.00	195.00
Jaida Hodge-Adams	JH	Fellow	3.30	325.00	1,072.50
Total			**105.20**		**$ 79,868.00**

TOTAL THIS INVOICE **$ 79,868.00**

Stris

November 1, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14251
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through August 31, 2024

RE: Midas Green Litigation

Total Professional Services	$ 855.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 855.00**

Electronic Invoice

Invoice # 14251 November 1, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
8/29/24	EB	Confer with BA and PB and correspond with [redacted] regarding suggestion of bankruptcy.	.30	1100.00	330.00
8/29/24	BA	Correspond and confer with EB regarding filing of bankruptcy notice, draft same, and review comments from bankruptcy counsel on same.	.50	1050.00	525.00
		TOTAL PROFESSIONAL SERVICES			**$ 855.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	.30	1,100.00	330.00
Bridget Asay	BA	Partner	.50	1,050.00	525.00
Total			**.80**		**$ 855.00**

TOTAL THIS INVOICE **$ 855.00**

Stris

November 1, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14252
Client # 00346
Matter # 006

INVOICE SUMMARY

For professional services rendered through August 31, 2024

RE: Tarrant County Litigation

Total Professional Services	$ 23,226.75
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 23,226.75**

Electronic Invoice

Invoice # 14252 November 1, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
8/26/24	EB	No Charge - Attention to engagement letter.	.20	990.00	N/C
8/26/24	JS	Evaluate status and next steps for potential responses and confer with P. Tomasco regarding same.	1.10	787.50	866.25
8/26/24	SR	Correspond with BA and JS regarding outstanding action items relating to answer and motion to compel.	.10	585.00	58.50
8/27/24	BA	Confer with JS regarding strategy and [redacted] in light of [redacted] (0.4); research [redacted] stay and correspond with JS regarding same (0.3).	.70	945.00	661.50
8/27/24	JS	Confer with client and co-counsel regarding responses and next steps (0.9); conduct research regarding [redacted] (0.5).	1.40	787.50	1,102.50
8/28/24	EB	No Charge - Attention to engagement terms including teleconference with VO.	.20	990.00	N/C
8/28/24	BA	Correspond with JS and with bankruptcy team regarding responses for [redacted] and confer with JS regarding strategy for same (0.4); review draft motion to compel to assess further steps necessary to prepare for filing (0.3).	.70	945.00	661.50
8/28/24	JS	Review, evaluate, and edit draft responses (1.9); confer with W. Thompson and BA regarding strategy for same (1.0).	2.90	787.50	2,283.75
8/29/24	BA	Continue researching, drafting, and revising response filings, including motion to compel and answer (4.1); correspond with clients including [redacted] regarding same (0.2).	4.30	945.00	4,063.50
8/29/24	JS	Draft plea in abatement sections relating to bankruptcy, related proceedings, and arbitration.	11.40	787.50	8,977.50
8/29/24	SR	Correspond with JH regarding exhibit collection for answer.	1.50	585.00	877.50
8/29/24	JH	Confer with SR regarding exhibits (0.5); begin collecting and labeling exhibits to create exhibits packet (2.0).	2.50	292.50	731.25
8/30/24	BA	Review, draft, and revise responsive pleadings (1.5); research regarding [redacted] (0.2); confer with litigation team and bankruptcy counsel regarding [redacted] (0.3).	2.00	945.00	1,890.00

Stris & Maher LLP

Invoice # 14252 November 1, 2024

Date	Tkpr	Description	Hours	Rate	Amount
8/30/24	JH	Finalize exhibits packet for BA, SR and JS.	3.60	292.50	1,053.00
		TOTAL PROFESSIONAL SERVICES			**$ 23,226.75**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Bridget Asay	BA	Partner	7.70	945.00	7,276.50
John Stokes	JS	Partner	16.80	787.50	13,230.00
Sarah Rahimi	SR	Associate	1.60	585.00	936.00
Jaida Hodge-Adams	JH	Fellow	6.10	292.50	1,784.25
Total			**32.20**		**$ 23,226.75**

TOTAL THIS INVOICE **$ 23,226.75**

Stris

November 4, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14257
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through September 30, 2024

RE: Midas Green Litigation

Total Professional Services	$ 660.00
Total Expenses Advanced	$ 7,530.00
TOTAL THIS INVOICE	**$ 8,190.00**
Previous Balance	$ 855.00
TOTAL BALANCE DUE	**$ 9,045.00**

Electronic Invoice

Invoice # 14257 November 4, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
9/04/24	EB	Confer with counsel for GRC regarding request to accept service of subpoena (0.2); correspond with PS, VO, JS, CS, and PB regarding same and questions for bankruptcy counsel (0.1).	.30	1100.00	330.00
9/05/24	EB	Update PB (0.1) and [redacted] (0.1) regarding request to accept service of GRC subpoena.	.20	1100.00	220.00
9/07/24	EB	Correspond with CS regarding status of subpoena service request.	.10	1100.00	110.00
		TOTAL PROFESSIONAL SERVICES			**$ 660.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	.60	1,100.00	660.00
Total			**.60**		**$ 660.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
7/31/24		JND eDiscovery - Host-Stor2.	3,765.00
8/31/24		JND eDiscovery - Host-Stor2.	3,765.00
		TOTAL EXPENSES ADVANCED	**$ 7,530.00**
		TOTAL THIS INVOICE	**$ 8,190.00**

Stris

November 4, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14259
Client # 00346
Matter # 002

INVOICE SUMMARY

For professional services rendered through September 30, 2024

RE: Temple Green Data Litigation

Total Professional Services	$ 15,300.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 15,300.00**
Previous Balance	$ 7,190.00
TOTAL BALANCE DUE	**$ 22,490.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14259 November 4, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
9/13/24	VO	Review and respond to email from [redacted] regarding Temple Green Data request for financial information (0.2); prepare email to CS regarding analysis needed of [redacted] associated with [redacted] and [redacted] (0.3).	.50	875.00	437.50
9/17/24	CS	Review and analyze viability of and requirements for [redacted] claim [redacted] (1.4); review and analyze [redacted] language regarding same (1.1).	2.50	725.00	1,812.50
9/18/24	VO	Confer with CS regarding [redacted] claim (0.2).	.20	875.00	175.00
9/18/24	CS	Confer with VO regarding (0.2) and begin analyzing [redacted] claims for [redacted] (1.9).	2.10	725.00	1,522.50
9/19/24	CS	Review and analyze information received from client and revise memorandum regarding [redacted] in light of the same (0.9); continue analyzing lease for [redacted] (2.6).	3.50	725.00	2,537.50
9/20/24	VO	Review and analyze memorandum prepared by CS regarding [redacted] (1.6); correspond with [redacted] regarding follow-up questions in support of same (0.3).	1.90	875.00	1,662.50
9/20/24	CS	Continue drafting memorandum regarding [redacted] (1.0); review and analyze contractual [redacted] liability (1.2); analyze possible remedies regarding [redacted] (1.3).	3.50	725.00	2,537.50
9/23/24	VO	Prepare assessment for [redacted] regarding [redacted] (3.2); review memoranda and correspondence from CS in connection with same (0.5).	3.70	875.00	3,237.50
9/23/24	CS	Continue analyzing and update VO regarding [redacted].	1.90	725.00	1,377.50
		TOTAL PROFESSIONAL SERVICES			**$ 15,300.00**

Stris & Maher LLP

Invoice # 14259 November 4, 2024

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Victor O'Connell	VO	Partner	6.30	875.00	5,512.50
Colleen Smith	CS	Associate	13.50	725.00	9,787.50
Total			**19.80**		**$ 15,300.00**

TOTAL THIS INVOICE **$ 15,300.00**

Stris

November 4, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14261
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through September 30, 2024

RE: Retention and Fee Applications

Total Professional Services	$ 47,165.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 47,165.00**

Electronic Invoice

Invoice # 14261 November 4, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
9/03/24	PS	Review Quinn email regarding retention pleading deadlines and parties in interest conflicts list (0.1); review and analyze exemplar retention pleadings and relevant statutes (1.9); meet with VO regarding same (0.3); confer with CS regarding preparation of retention application (0.4); correspond with Stris team regarding preparation of declaration in support of retention application (0.7); coordinate with team regarding conflict check and data collection for retention application (0.5).	3.90	1250.00	4,875.00
9/03/24	CS	Meet with PS to discuss application for order authorizing retention and employment of Stris & Maher LLP as special litigation counsel (0.4); review and analyze rules and statutes governing same (0.3).	.70	725.00	507.50
9/03/24	PB	Draft declaration of P. Stris regarding motion for retention (0.6).	.60	725.00	435.00
9/04/24	PS	Review and revise draft retention application (0.5); confer with VO regarding and update Stris team regarding same (0.4); coordinate with Stris team regarding data needed for supporting declaration (0.3).	1.20	1250.00	1,500.00
9/04/24	VO	Review and revise retention pleading (0.8); correspond with Stris team regarding same (0.2).	1.00	875.00	875.00
9/04/24	JS	Review and revise retention application.	.90	875.00	787.50
9/04/24	CS	Begin drafting application for order authorizing the retention and employment of Stris & Maher as special litigation counsel.	1.00	725.00	725.00
9/04/24	PB	Continue drafting PS declaration in support of retention application.	1.00	725.00	725.00
9/05/24	PS	Coordinate with Stris team regarding revisions to retention application.	.90	1250.00	1,125.00
9/05/24	VO	Review and comment on draft declaration [redacted] in support of retention application (0.1).	.10	875.00	87.50
9/05/24	JS	Further review and revise retention application and supporting declarations.	.40	875.00	350.00

Invoice # 14261 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/05/24	CS	Draft [redacted] declaration (1.6); revise retention application to incorporate partner feedback (3.3).	4.90	725.00	3,552.50
9/05/24	PB	Continue drafting PS declaration in support of retention application.	1.70	725.00	1,232.50
9/06/24	PS	Review updated draft retention application (0.3); confer with CS regarding edits to same (0.6); confer with Stris team regarding data for accompanying declaration (0.4).	1.30	1250.00	1,625.00
9/06/24	EB	Begin reviewing draft retention application and correspond with PS, VO, JS, CS, and PB regarding revisions to same.	.20	1100.00	220.00
9/06/24	VO	Research and provide underlying factual data and information in support of retention application.	1.30	875.00	1,137.50
9/06/24	CS	Confer with PS to discuss further revisions to retention application (0.6); implement same (4.5).	5.10	725.00	3,697.50
9/08/24	PS	Review retention application and discuss edits with Stris team.	1.30	1250.00	1,625.00
9/08/24	EB	Review revised retention application and correspond with PS, VO, and CS regarding same (0.1); further revise and propose additional revisions to same (1.2); review and revise supporting declarations (0.2).	1.50	1100.00	1,650.00
9/08/24	VO	Review and revise retention application and supporting declarations of PS and C. Topping (2.4); correspond with P. Tomasco regarding related information (0.1).	2.50	875.00	2,187.50
9/08/24	JS	Review and propose comments and edits to retention application.	1.50	875.00	1,312.50
9/08/24	CS	Review edits and comments on retention application and continue to implement same.	3.50	725.00	2,537.50
9/08/24	PB	Revise PS declaration in support of retention application.	.80	725.00	580.00
9/09/24	VO	Continue to fact check and revise retention application and PS declaration (4.5); review U.S. Trustee fee guidelines in support of same (0.3).	4.80	875.00	4,200.00
9/09/24	CS	Review and edit further revised PS declaration in support of retention application (1.5); update draft of same with declaration citations (0.7).	2.20	725.00	1,595.00
9/09/24	PB	Revise PS declaration in support of retention application.	2.20	725.00	1,595.00

Stris & Maher LLP

Invoice # 14261 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/10/24	VO	Propose further revisions to PS and [redacted] declarations.	.60	875.00	525.00
9/10/24	CS	Revise retention application including to incorporate citations to [redacted] declaration.	.90	725.00	652.50
9/10/24	PB	Revise declaration of P. Stris regarding retention application to incorporate feedback from VO (0.4).	.40	725.00	290.00
9/13/24	VO	Prepare email to [redacted] regarding retention application.	.10	875.00	87.50
9/16/24	VO	Correspond and confer with Stris team regarding final edits to retention application (0.5); confer with W. Thompson regarding same (0.1); correspond with counsel at Quinn Emanuel regarding same (0.1)..	.70	875.00	612.50
9/16/24	CS	Attention to further revisions to retention application and supporting declarations.	.90	725.00	652.50
9/16/24	PB	Implement further revisions to declaration of PS in support of retention application.	.80	725.00	580.00
9/18/24	VO	Correspond with Stris team and P. Tomasco regarding payment of experts.	.20	875.00	175.00
9/19/24	VO	Confer with PS regarding retention application.	.60	875.00	525.00
9/19/24	PS	Confer with VO regarding retention application.	.60	1250.00	750.00
9/21/24	VO	Review proposed final retention application files forwarded by P. Tomasco and make final edits to same (0.7); correspond with P. Tomasco and [redacted] regarding same (0.1).	.80	875.00	700.00
9/22/24	VO	Continue making finalizing edits to retention application (0.6); correspond with P. Tomasco regarding same (0.1).	.70	875.00	612.50
9/25/24	VO	Review and respond to email from A. Popescu (Province) regarding [redacted] estimate.	.30	875.00	262.50
		TOTAL PROFESSIONAL SERVICES			**$ 47,165.00**

Invoice # 14261 November 4, 2024

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	9.20	1,250.00	11,500.00
Elizabeth Brannen	EB	Partner	1.70	1,100.00	1,870.00
Victor O'Connell	VO	Partner	13.70	875.00	11,987.50
John Stokes	JS	Partner	2.80	875.00	2,450.00
Colleen Smith	CS	Associate	19.20	725.00	13,920.00
Peter Brody	PB	Associate	7.50	725.00	5,437.50
Total			**54.10**		**$ 47,165.00**

TOTAL THIS INVOICE **$ 47,165.00**

Stris

November 4, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14263
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through September 30, 2024

RE: Whinstone Litigation

Total Professional Services	$ 1,102,504.50
Total Expenses Advanced	$ 36,733.50
TOTAL THIS INVOICE	**$ 1,139,238.00**
Previous Balance	$ 79,868.00
TOTAL BALANCE DUE	**$ 1,219,106.00**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Invoice # 14263 November 4, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
9/01/24	BA	Review Whinstone's first set of requests for production and begin drafting objections and responses (2.5); research local protective orders and correspond with bankruptcy counsel and litigation team regarding proposed scheduling order and protective order (0.3).	2.80	1050.00	2,940.00
9/01/24	VO	Call with JS regarding discovery planning (0.3); confer and correspond with litigation team regarding trial planning (0.4).	.70	875.00	612.50
9/01/24	JS	Further review and evaluate Whinstone documents for use in depositions and at trial.	5.50	875.00	4,812.50
9/02/24	EB	Review revised proposed scheduling order (0.1); correspond with BA and JS regarding same (0.1); attention to deposition planning and case management (0.1).	.30	1100.00	330.00
9/02/24	BA	Analyze and begin preparing responses to Whinstone's first sets of RFPs (1.9); correspond with A. Swartz regarding same (0.1); syntehsize and convey comments on revised schedule to bankruptcy and litigation counsel (0.3); review and revise final draft of proposed schedule for P. Tomasco and opposing counsel (0.2); review and correspond with JS and P. Tomasco regarding draft notice of removal and related filings (0.3); correspond with bankruptcy counsel and with litigation team regarding action items in support of removal of Tarrant County litigation to bankruptcy court (0.3); draft and correspond with litigation team regarding proposed interrogatories to Whinstone (1.8).	4.80	1050.00	5,040.00
9/02/24	VO	Confer with J. Cohn regarding strategic planning (0.2); emails with P. Tomasco regarding same (0.1); confer with PB regarding document review staffing and strategy (0.5).	.80	875.00	700.00
9/02/24	JS	Prepare strategy for defensive depositions (1.4); further review Whinstone production for hot documents (0.7); review and evaluate Notice of Removal of Tarrant County litigation and supporting documents (0.7); evaluate strategy and begin drafting interrogatories for inclusion in initial set (1.1).	3.90	875.00	3,412.50
9/02/24	PB	Confer with VO regarding document review staffing.	.50	725.00	362.50

Stris & Maher LLP

Invoice # 14263 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/02/24	MJ	Review assigned document batches.	.50	480.00	240.00
9/02/24	HS	Review and analyze document review protocol to prepare for advising and assisting with document review (0.8).	.80	480.00	384.00
9/03/24	PS	Correspond with Stris team regarding trial planning (0.1).	.10	1250.00	125.00
9/03/24	EB	Attend teleconference with ERCOT expert C. Griffey (0.1); confer with BA, JS, PB, and HM regarding same and expert retention letters (0.2); correspond with [redacted] and C. Griffey regarding status and next steps (0.1); attention to case management (0.1).	.50	1100.00	550.00
9/03/24	BA	Participate in teleconference with [redacted], bankruptcy counsel, and litigation counsel to discuss high priority action items in contested matter, including schedule, discovery, and case strategy (1.0); review and correspond with P. Tomasco regarding edits to motion to transfer (0.9); review proposed protocols for deposition preparation (0.1); attend teleconferences with JS, VO, PB, and A. Swartz regarding deposition planning and discovery (1.1); correspond with EB regarding engagement of expert C. Griffey (0.1); correspond with litigation team regarding engagement of technology vendor for discovery (0.3); review proposed scheduling order from Whinstone and related team correspondence (0.3); evaluate potential production regarding electricity data (0.2); evaluate exemplar protective order for possible use (0.2).	4.20	1050.00	4,410.00
9/03/24	VO	Attend videoconference with Quinn, LKC, and Stris teams to discuss strategy (1.0); confer with JS regarding deposition and staffing plan (0.7); confer with PB regarding document discovery review planning (0.3); confer with HM and CH regarding document review logistics and assignments (0.2).	2.10	875.00	1,837.50
9/03/24	JS	Review and evaluate scheduling order and propose edits to same (0.8); plan discovery and trial preparation steps in light of likely schedule (9.3); confer with BA, WT, and VO regarding interrogatories, deposition planning, and global strategy (1.8).	11.90	875.00	10,412.50

Invoice # 14263 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/03/24	PB	Attention to document review team staffing and strategy and advise HM and review team regarding same (0.5); attend team teleconference regarding litigation strategy (1.0); attend teleconference with BA, JS, and A. Swartz regarding document review and production strategy (0.8); analyze and prepare documents for analysis by review team (4.8); confer with VO regarding review team staffing and strategy (0.3); confer with JS regarding discovery and review plan (0.6); attention to discovery associate and quality control document reviewer onboarding (0.4).	8.40	725.00	6,090.00
9/03/24	SR	Confer with PB regarding document review project (0.2); review and analyze document review [redacted] (2.3).	2.50	650.00	1,625.00
9/03/24	HM	Draft email to T. Stefan of Setec Investigations regarding engagement letter changes and circulate to BA, VO, EB, JS, and PB (0.3); confer with PB about second document production and document review timeline and HS about document review [redacted] and procedure (0.6); confer with VA about document review [redacted] and procedure (0.7); correspond with FF to arrange conference regarding same (0.1); correspond with HS, VA, and FF regarding document review (0.2).	1.90	600.00	1,140.00
9/03/24	MJ	Attend document review daily team meeting (0.5); review assigned document batches (3.6).	4.10	480.00	1,968.00
9/03/24	PNY	Attend document review daily team meeting (0.5); review assigned document batches (7.5).	8.00	480.00	3,840.00
9/03/24	VA	Review document review protocol [redacted] (1.0); attend case review call with HM (0.5); review assigned document batches (3.0).	4.50	480.00	2,160.00
9/03/24	HS	Review assigned document batches.	6.80	480.00	3,264.00
9/03/24	FF	Attend portion of document review daily team meeting (0.2); review assigned document batches (9.8).	10.00	480.00	4,800.00

Invoice # 14263 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/03/24	CHH	Attend portion of teleconference with PB, HM, A. Swartz (Lehotsky) and review team regarding document review (0.2); review and analyze A. Swartz emails regarding case management and implement recommendations in same (0.3); update VO and HM regarding document review progress (0.1); correspond with review team members regarding same (0.4).	1.00	325.00	325.00
9/04/24	PS	Review updates regarding experts (0.2); Tarrant County lawsuit (0.1); and discovery issues and action items (0.3).	.60	1250.00	750.00
9/04/24	EB	Review and respond to team correspondence regarding status and high priority action items (0.3).	.30	1100.00	330.00
9/04/24	BA	Confer with JS and with W. Thompson regarding discovery strategy and action items (0.8); attend portion of teleconference with Stris and LKC litigation team to discuss trial planning including expert retention (0.6); attend portion of teleconference with JS, CS, SR, VO, and PB to discuss deposition planning (0.8); confer with PB and JS regarding document review and responses to Whinstone's RFPs (0.4); confer with PB and Stoneturn expert team regarding bankruptcy engagement and scope (0.3); review and revise draft protective order and convey same to bankruptcy counsel and litigation team for review (1.6); review and revise draft interrogatories and convey same to litigation team for review (1.0); review proposed engagement letter for C. Griffey and correspond with EB, JS, and PB regarding same (0.2); review team correspondence regarding schedule and proposed order submitted by Whinstone (0.2).	5.70	1050.00	5,985.00
9/04/24	VO	Attend videoconference with LKC and Stris teams regarding expert planning (0.8); attend videoconference with Stris team regarding deposition planning (1.0).	1.80	875.00	1,575.00

Stris & Maher LLP

Invoice # 14263 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/04/24	JS	Prepare defensive deposition plan (1.1); confer with BA and Stris team regarding deposition assignments and planning (1.3); review and revise scheduling order and confer with opposing counsel regarding same (1.9); draft correspondence to Whinstone regarding schedule (0.7); review and revise interrogatories (1.5); review other outstanding written discovery matters (1.4); evaluate expert strategy (1.6) and attend videoconference with Stris and LKC teams regarding same (0.8); review status of document production and confer with PB and BA regarding same (1.5).	11.80	875.00	10,325.00
9/04/24	PB	Attend teleconference with Stris and LKC teams regarding expert strategy and workflow planning (0.8); attend portion of teleconference with BA, JS, SR, and HM regarding defensive deposition strategy (0.8); review and analyze material for potential production (3.4); confer with BA and JS regarding responses to Whinstone discovery requests (0.5); confer and correspond with M. Haley (Stoneturn), A. Cooper (Stoneturn), and BA regarding Stoneturn expert analysis (0.4); analyze financial documentation requested by expert team (2.6); attention to and update VO regarding review team staffing (0.3); revise draft engagement letter for expert C. Griffey (0.5).	8.50	725.00	6,162.50
9/04/24	CS	Attend portion of Stris team teleconference regarding deposition planning and preparation for Rhodium witnesses.	1.00	725.00	725.00
9/04/24	SR	Attend teleconference with Stris and LKC teams regarding expert and fact witnesses (0.8); attend portion of teleconference with BA, JS, VO, CS, PB, HM, CHH, and SB regarding defensive deposition preparation and planning (0.9); begin reviewing potentially privileged documents and continue analyzing document review [redacted] in connection with same (4.2).	5.90	650.00	3,835.00

Stris & Maher LLP

Invoice # 14263 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/04/24	HM	Attend portion of teleconference with BA, JS, VO, CS, PB, SR, CHH, and SB for defensive deposition preparation and planning (0.9); attend document review daily team meeting (0.2); confer with FF about document review protocol and procedure (0.9); draft requests for production to Whinstone for bankruptcy proceeding (1.5); manage and revise [redacted] docket, Master Task List, and schedule of deadlines (1.0); attend portion of teleconference with BA, JS, VO, CS, PB, SR, CHH, JHA, SB, A. Swartz, J. Cohn, and W. Thompson for expert report and deposition planning (0.6); draft [redacted] for performing quality checks for second production (1.0); correspond with HH, VO, VA, HS, and FF about document review (0.5).	6.60	600.00	3,960.00
9/04/24	MJ	Attend document review daily team meeting (0.2); review assigned document batches (4.8).	5.00	480.00	2,400.00
9/04/24	PNY	Attend document review daily team meeting (0.2); review assigned document batches (7.8).	8.00	480.00	3,840.00
9/04/24	VA	Review document review protocol (0.3); attend document review daily team meeting (0.2); review assigned document batches (7.5).	8.00	480.00	3,840.00
9/04/24	HS	Review assigned document batches.	5.50	480.00	2,640.00
9/04/24	FF	Attend document review daily team meeting (0.2); review assigned document batches (9.8).	10.00	480.00	4,800.00
9/04/24	SB	No Charge - Attend teleconference with Stris and LKC teams regarding expert and fact witnesses (0.8); attend teleconference with BA, JS, VO, CS, PB, HM, CHH and SR for defensive deposition preparation and planning (0.9); review dockets to identify relevant documents in preparation for [redacted] depositions (1.6).	3.30	325.00	N/C

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Date	Tkpr	Description	Hours	Rate	Amount
9/04/24	CHH	Review and analyze document review progress and update PB regarding same (0.4); review and analyze [redacted] (Rhodium) emails regarding [redacted] (0.2); attend and participate in daily document review check-in with PB, HM, A. Swartz (Lehotsky), and discovery associates (0.2); attend portion of teleconference with BA, JS, VO, CS, PB, SR, HM, and SB for deposition preparation and planning (0.9); summarize key takeaways from same for Stris team (0.3); collect Whinstone financial documents further review by PB (0.2); review A. Swartz email regarding offensive document review and assist with set up of same (0.3); collect key documents for JS and VO review for defensive deposition preparation (0.5); confer with discovery associate FF regarding document review and support for same (0.2).	3.20	325.00	1,040.00
9/04/24	JH	Attend portion of teleconference with JS, AS, HM, BA, JC, VO, SB, WT, SR and PB regarding deposition preparation and planning (0.8); prepare notes for same (1.0).	1.80	325.00	585.00
9/05/24	PS	Review scheduling order and related emails (0.2); review emails regarding discovery (0.6); coordinate with team regarding data collection for declaration (0.4); review draft [redacted] (0.2); review emails between P. Rosenblatt and P. Tomasco regarding third party subpoenas (0.1).	1.50	1250.00	1,875.00
9/05/24	EB	Correspond with PB regarding Stoneturn engagement letter (0.1); review team correspondence and scheduling order (0.1).	.20	1100.00	220.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/05/24	BA	Correspond with K. Hutchins and bankruptcy counsel to confirm plan for review, finalization, and service of RFPs and subpoenas, and correspond with A. Swartz regarding compliance locations for subpoenas (0.3); review draft subpoenas to C. Harris, L. Therriot, and Riot, and convey edits on same to A. Swartz (1); review draft RFPs to Whinstone and convey revisions to same to HM, JS, and team (0.5); correspond with JS regarding status of and plan for discovery (0.1); confer with JS regarding strategy and action items (0.2); review edits on draft protective order from K. Hutchins, correspond with K. Hutchins regarding same, finalize same and convey to opposing counsel for review (0.4); correspond with HM, JS, and PB as necessary to monitor preparation for next document production and oversee finalization and service of requests to produce on Whinstone (0.8); review and revise draft interrogatories to Whinstone and convey same to litigation team for review (1); review motion to transfer and correspond with P. Tomasco regarding same (0.2); correspond with PB and team regarding production formatting to maintain consistency with prior productions (0.2); review scheduling order as entered by court and correspond with CH and team regarding calendaring (0.2).	4.90	1050.00	5,145.00
9/05/24	JS	Attend teleconference with BA regarding discovery status and next steps (0.3); attend teleconference with W. Thompson regarding offensive discovery and outlining core arguments in connection with same (0.8); review written discovery to be served on Whinstone and third parties (2.6); review protective order (0.7); review [redacted] and emails in preparation for depositions of Rhodium [redacted] (4.5); work on deposition line planning (1.5); review M. Thomas deficiency letter and begin preparing response to same (1.1); review new edits to motion to transfer [redacted] (0.5).	12.00	875.00	10,500.00
9/05/24	PB	Prepare second production of documents to Whinstone and correspondence regarding same (6.2); attend daily call with document review associate team regarding quality-control issues (0.2); teleconference with S. Rahimi regarding production review strategy (0.4)	6.80	725.00	4,930.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/05/24	CS	Meet with AA to discuss documents in Whinstone production (0.2); begin reviewing documents in Whinstone production relevant to [redacted] (2.0); review background information regarding [redacted] in anticipation of preparing him for his deposition (0.4).	2.60	725.00	1,885.00
9/05/24	SR	Continue conducting document review of potentially privileged documents (7.2); attend teleconference with PB regarding the same (0.3).	7.50	650.00	4,875.00
9/05/24	HM	Attend document review daily team meeting (0.3); review assigned document batches (7.9).	8.20	600.00	4,920.00
9/05/24	MJ	Attend document review daily team meeting (0.3); review assigned document batches (3.0).	3.30	480.00	1,584.00
9/05/24	PNY	Attend document review daily team meeting (0.3); review assigned document batches (9.7).	10.00	480.00	4,800.00
9/05/24	VA	Attend document review daily team meeting (0.3), review assigned document batches (7.7).	8.00	480.00	3,840.00
9/05/24	HS	Attend document review daily team meeting (0.3); review assigned document batches (5.9).	6.20	480.00	2,976.00
9/05/24	FF	Attend document review daily team meeting (0.3); review assigned document batches (9.7).	10.00	480.00	4,800.00
9/05/24	CHH	Review and collate [redacted] documents in .pdf form in preparation for depositions (0.4); review and organize documents for discovery associates to review, emails with PB, HM, and A. Swartz (Lehotsky) regarding same (0.3); prepare potential second production set for PB, HM, and A. Swartz (Lehotsky) to review (0.8); emails with FF regarding review issues and troubleshoot same (0.2); review and analyze scheduling order and update matter docket and calendar accordingly to ensure compliance (0.7); telephone call with JS regarding document review procedures (0.1).	2.50	325.00	812.50
9/05/24	ASA	Meet with CS to discuss documents in Whinstone production (0.2); provide overview of documents in Whinstone production to assist CS deposition preparation (0.5).	.70	325.00	227.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/06/24	PS	Prepare for and attend teleconference with P. Tomasco, P. Rosenblatt, JS, and VO regarding third party subpoenas (1.4); review subpoenas and discuss with internal team (1.1); review emails regarding discovery (0.5).	3.00	1250.00	3,750.00
9/06/24	EB	Correspond with BA and JS regarding priority action items for Stris attorney team.	.10	1100.00	110.00
9/06/24	BA	Review and finalize proposed engagement letter for potential expert C. Griffey, correspond with litigation team regarding same, and convey same to C. Griffey for review and to schedule meeting (0.4); review draft subpoenas to Riot, C. Harris, and J. Ledoux, correspond with HM regarding revisions to same (1.0); review and approve subpoena to L. Therriot (0.3); confer with JS regarding discovery and third party subpoenas (0.4); review Whinstone's interrogatories (0.3); correspond with HM, JS, and PB to confirm status of pending discovery and production (0.2); outline priority action items for team, correspond with JS and EB regarding same, and convey same to EB, JS, PB, CS, SR, VO, and PS (0.5); review outline of [redacted] deadlines prepared by HM and correspond with HM regarding revisions to same (0.2).	3.30	1050.00	3,465.00
9/06/24	VO	Attend teleconference with PS, JS, P. Tomasco, [redacted], and P. Rosenblatt regarding investor subpoena (0.3); correspondence with [redacted] (0.1); update team (0.1) and confer with [redacted] (0.2) regarding same.	.70	875.00	612.50
9/06/24	JS	Teleconferences with BA regarding discovery matters and third-party subpoenas (0.4); review discovery to be issued (1.5); review [redacted] in connection with next production (0.7); review [redacted] in connection with [redacted] deposition prep (3.5); confer with VO regarding deposition prep (0.4); work on potential response letter to M. Thomas regarding outstanding discovery issues (0.4); prepare for and attend teleconference with PS, VO, P. Tomasco, and P. Rosenblatt regarding subpoenas [redacted] (0.5); review [redacted] subpoenas and evaluate same (0.9).	8.30	875.00	7,262.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/06/24	PB	Attend teleconference with PB, HM, CHH, and [redacted] (Rhodium) to discuss financial documents for production (0.8); attend daily call with document review associate team regarding production issues (0.3); teleconference with [redacted] (Rhodium) regarding data collection (0.5); teleconference with J. Stokes regarding production plan (0.2); prepare second production of documents to Whinstone and perform final review of same (4.3).	6.10	725.00	4,422.50
9/06/24	CS	Meet with SR to discuss plan for preparing [redacted] and [redacted] for their depositions (0.5); review and analyze documents received from Whinstone relevant to [redacted] to begin preparing for his deposition (2.1).	2.60	725.00	1,885.00
9/06/24	SR	Continue conducting document review of potentially privileged documents (6.3); attend videoconference with CS to begin planning deposition preparations for [redacted] and [redacted] (0.3).	6.60	650.00	4,290.00
9/06/24	HM	Complete quality check of additional documents (3.7); attend document review daily team meeting (0.3); correspond with discovery associates about daily tasks and action items (0.6); update and recirculate information concerning review guidelines to discovery associates (0.5); attend teleconference with PB, CHH, and client contacts regarding financial documents (0.8); update task list to reflect current schedule and deadlines (1.4); advise and quality check calendaring of same (0.5); revise, finalize, and serve subpoena notices for multiple third party witnesses (1.8); correspond with CS and SR regarding documents for [redacted] and [redacted] deposition preparation (0.5).	10.10	600.00	6,060.00
9/06/24	MJ	Attend document review daily team meeting (0.3); review assigned documents (0.7).	1.00	480.00	480.00
9/06/24	PNY	Attend document review daily team meeting (0.3); review assigned document batches (7.7).	8.00	480.00	3,840.00
9/06/24	VA	Attend document review daily team meeting (0.3); review assigned document batches (7.7).	8.00	480.00	3,840.00
9/06/24	HS	Attend document review daily team meeting (0.3); review assigned document batches (9.6).	9.90	480.00	4,752.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/06/24	FF	Attend document review daily team meeting (0.3); review assigned document batches (9.7).	10.00	480.00	4,800.00
9/06/24	CHH	Attend teleconference with PB, HM, and Rhodium [redacted] to discuss financial documents (0.8); attend and participate in daily check-in regarding document review with HM, PB, and discovery associates (0.3); prepare proposed production set 2 for PB and HM further review (2.0); review and analyze documents for correspondence regarding power contracts (3.0).	6.10	325.00	1,982.50
9/06/24	JH	File exchanged discovery [redacted] (0.2); update Bankruptcy docket (0.3).	.50	325.00	162.50
9/06/24	ASA	Update [redacted] to reflect recent developments at request of HM.	.40	325.00	130.00
9/07/24	PS	Review master task list and witness preparation [redacted] and correspond with team regarding same.	1.10	1250.00	1,375.00
9/07/24	EB	Review interrogatories served by Whinstone and correspondence from co-counsel regarding [redacted] (0.1); research same (0.1); correspond with BA and JS regarding research results and [redacted] objections to same (0.1); attention to case management (0.8).	1.10	1100.00	1,210.00
9/07/24	BA	Research and analyze [redacted] third party subpoenas, including [redacted] and correspond with JS regarding potential strategies for same (1.5); research interrogatory limits and correspond with EB and JS regarding same, as relevant to Whinstone's service of interrogatories and with HM regarding status of state court proceedings (0.2).	1.70	1050.00	1,785.00
9/07/24	JS	Evaluate documents that need further review in connection with defensive deposition preparation [redacted].	1.30	875.00	1,137.50
9/07/24	HM	Update schedule of deadlines and master task list and circulate it to Stris & Maher and Lehotsky Keller Cohn litigation teams (1.8); update Rhodium [redacted] and circulate to Stris & Maher litigation team (1.8).	3.60	600.00	2,160.00
9/07/24	VA	Review assigned document batches (4.0).	4.00	480.00	1,920.00
9/07/24	HS	Review assigned document batches (10.0).	10.00	480.00	4,800.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/07/24	FF	Review assigned document batches (10.0).	10.00	480.00	4,800.00
9/08/24	PS	Confer with team regarding third party subpoenas.	.60	1250.00	750.00
9/08/24	EB	Review task list and correspond with PS, BA and JS regarding deposition planning (0.1); correspond with BA and JS regarding responses and objections to interrogatories (0.1); begin reviewing witness preparation [redacted] (0.1); correspond with HM regarding initial revisions to same and JS regarding further review and revisions (0.1).	.40	1100.00	440.00
9/08/24	BA	Continue researching and analyzing [redacted] for [redacted] subpoenas, convey summary of analysis and recommendation to litigation team, and correspond further with PS and JS regarding strategy for same (2.2); review proposed email to M. Thomas following up on discovery issues, propose revisions to same, and correspond with JS regarding related discovery matters (0.3); correspond with PB, HM, and JS regarding confidentiality tagging on production and collection of documents for ERCOT expert C. Griffey (0.2); correspond with JS regarding priority action items and correspond with team regarding same (0.4).	3.10	1050.00	3,255.00
9/08/24	JS	Prepare list of priorities for discovery and [redacted] for the week (0.8); draft response response email to M. Thomas deficiency letter (0.5).	1.30	875.00	1,137.50
9/08/24	SR	Continue reviewing potentially privileged documents.	3.40	650.00	2,210.00
9/08/24	HM	Update task list including to add items from BA (0.3); revise draft of email to T. Stefan (Setec Investigations) regarding engagement letter amendment (0.1); conduct quality control review of documents designated for production (0.6).	1.00	600.00	600.00
9/08/24	MJ	Review assigned documents (1.6).	1.60	480.00	768.00
9/08/24	PNY	Review assigned document batches (6.0).	6.00	480.00	2,880.00
9/08/24	VA	Review assigned document batches (7.0).	7.00	480.00	3,360.00
9/08/24	HS	Review assigned document batches (5.1).	5.10	480.00	2,448.00
9/08/24	FF	Review assigned document batches (8.0).	8.00	480.00	3,840.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/09/24	PS	Meet with PB regarding retention application revisions (0.5); review [redacted] in [redacted] dispute and confer J. Cohn regarding same (1.7); review emails and meet with team regarding trial issues and strategy (0.8); review emails regarding discovery and meet with team regarding same (0.4).	3.40	1250.00	4,250.00
9/09/24	EB	Confer with BA regarding status and high priority action items including deposition and trial preparation and accommodations (0.2); instruct AA and SB regarding action items in support of same (0.1); correspond with PS, BA, VO, and JS regarding trial team and attendees (0.1); confer with JS regarding high priority action items including deposition preparation [redacted] and case management-related action items (0.3); review and respond to team correspondence regarding high priority action items including [redacted], and trial planning and attendance (0.2).	.90	1100.00	990.00
9/09/24	BA	Correspond with JS and PB regarding discovery action items and deadlines (0.1); attend teleconference with JS, PB, and HM regarding priority action items, including upcoming discovery deadlines and expert retention (0.7); review updates and correspond with A. Swartz regarding service of subpoenas (0.1); correspond with HM regarding engagement letter for Setec, discovery vendor (0.1); begin analyzing potential issues and topics for additional affirmative discovery and correspond with team regarding need for same (0.6); correspond with C. Griffey regarding expert engagement and with PB regarding revised expert engagement letter for T. Lewis (0.2).	1.80	1050.00	1,890.00
9/09/24	VO	Emails with team regarding trial logistics (0.3); emails with team regarding [redacted] and review [redacted] (0.2); call and email [redacted] regarding same (0.1); confer with JS regarding same (0.3); confer with [redacted] and JS regarding same (0.5); emails with J. Cohn regarding same (0.3); confer with PB regarding document review progress and next steps (0.4); confer with JS regarding preparation for [redacted] defensive depositions (0.5).	3.50	875.00	3,062.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/09/24	JS	Attend teleconference with BA, PB, and HM regarding outstanding discovery issues and next steps (0.7); attend teleconferences with VO regarding [redacted] (0.3) and preparing for depositions of [redacted] (0.5); review issues in [redacted] and evaluate [redacted] issues (0.9); review April 22 notice of termination and evaluate [redacted] of same (1.3); correspond with co-counsel regarding same (0.3); attend teleconference with CS regarding drafting dispositive motion regarding same (0.1); review [redacted] documents in connection with deposition prep (1.0); plan for trial [redacted] (0.5); review energy credit calculation documents in connection with potential expert retention (0.3); review existing outlines of [redacted] depositions in connection with preparing for depositions [redacted] (1.3).	7.20	875.00	6,300.00
9/09/24	PB	Attend daily discovery associate teleconference (0.2); attend teleconference with BA, JS, and HM regarding case strategy and workflow allocation (0.7); coordinate collection of documents for, and review and prepare documents for, upcoming productions to Whinstone (6.8); confer with HM regarding quality check review (0.2); confer with VO regarding review staffing and next steps (0.4).	8.30	725.00	6,017.50
9/09/24	SR	Continue conducting document review of potentially privileged documents.	4.50	650.00	2,925.00
9/09/24	HM	Attend document review daily team meeting (0.2); advise FF regarding review (0.2); attend teleconference with BA, JS, and PB about upcoming deadlines and outstanding discovery (0.7); confer with PB about performing quality check on responsive documents for next production (0.2); draft responses to Whinstone's first set of requests for production (3.0); update and recirculate [redacted] Document Review [redacted] (0.2); confer with T. Stefan of Setec Investigations regarding amendments to engagement letter (0.2); revise, finalize, and serve subpoena to Riot through Foley (0.3); compile and send deposition preparation materials for [redacted] to JS and VO (0.3); correspond with JH regarding responses to Whinstone's interrogatories (0.1).	5.40	600.00	3,240.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/09/24	MJ	Attend document review daily team meeting (0.2); review assigned document batches (1.4).	1.60	480.00	768.00
9/09/24	PNY	Attend document review daily team meeting (0.2); review assigned document batches (9.8).	10.00	480.00	4,800.00
9/09/24	VA	Attend document review daily team (0.2); review assigned document batches (9.8).	10.00	480.00	4,800.00
9/09/24	HS	Review assigned document batches (4.0).	4.00	480.00	1,920.00
9/09/24	FF	Attend document review daily team meeting (0.2); review assigned document batches (9.8).	10.00	480.00	4,800.00
9/09/24	CHH	Finalize search terms for [redacted] email review and confer with JS and JHA regarding same (0.2); daily document review check-in with HM, PB, and discovery associates (0.2); prepare PS and CS information for pro hac vice applications (0.2); telephone [redacted] regarding November trial and logistics of same (0.1); assist with onboarding new attorneys to case per emails with A. Swartz (Lehotsky) (0.1).	.80	325.00	260.00
9/09/24	JH	Update docket and files with final exchanged discovery [redacted] (0.2); finalize Riot subpoena for HM (0.3); begin document review to issue-tag emails [redacted] production sets sent to or from [redacted] (4.5).	5.00	325.00	1,625.00
9/09/24	ASA	Assist JS and JH with review of client documents (0.6); confer with JH regarding same (0.1).	.70	325.00	227.50
9/10/24	PS	Review emails regarding discovery and Tarrant County lawsuit and discuss with team (0.3); review emails between P. Rosenblatt and P. Tomasco (0.2); review [redacted] filings and confer with team regarding same (0.4).	.90	1250.00	1,125.00
9/10/24	EB	Review proposed revisions to damages expert and text collection consulting engagement letters (0.2); correspond with BA, PB, and HM regarding revisions to same (0.2); review [redacted] materials (0.1); advise PB regarding revisions to [redacted] regarding same (0.2).	.70	1100.00	770.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/10/24	BA	Review updates and correspond with A. Swartz and team regarding service of subpoenas (0.1); correspond with [redacted] regarding service of subpoena on Imperium (0.1); correspond with PB, EB, and JS regarding expert engagement for C. Griffey and terms of said engagement, confer with C. Griffey regarding same, finalize engagement letter and convey same to C. Griffey, and arrange meeting with C. Griffey and team (0.8); review draft interrogatories and team correspondence regarding same, and ask A. Swartz to convey same to bankruptcy counsel for review (0.4); review correspondence and filings related to [redacted] related to [redacted] and correspond with litigation team regarding same (0.3); confer with JS regarding discovery and [redacted] issues (0.3); correspond with [redacted] and litigation team regarding weekly client meetings (0.2); continue analyzing need for additional affirmative discovery including potential RFAs and additional interrogatories (0.4); correspond with PB and HM regarding document production issues (0.1); review draft engagement letter for Setec, discovery vendor, and correspond with HM and EB regarding need for revisions to same (0.2).	2.90	1050.00	3,045.00
9/10/24	VO	Emails with team and [redacted] regarding letter [redacted] (0.2); confer with [redacted] regarding same (0.2); emails with [redacted] and J. Cohn regarding same (0.1).	.50	875.00	437.50
9/10/24	JS	Confer with W. Thompson regarding discovery issues and outlining of key merits arguments (0.8); confer with BA regarding discovery and potential [redacted] issues (0.3); draft [redacted] deposition outline, themes, and narrative (14.8).	15.90	875.00	13,912.50
9/10/24	SR	Continue conducting document review of potentially privileged documents (6.2); correspond with HM and CH regarding the same (0.1).	6.30	650.00	4,095.00
9/10/24	SB	No Charge - Format Responses to Whinstone's RFPs for HM.	2.90	325.00	N/C
9/10/24	CS	Review and analyze case law and legal authority regarding bankruptcy laws and standards governing motions to assume executory contracts (2); analyze notice of termination and outline [redacted] for termination cited therein (2.8).	4.80	725.00	3,480.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/10/24	CHH	Complete review of contract negotiation and drafting emails between Whinstone and Rhodium and send memorandum on same to JS for review (2.2); daily check-in with HM, PB, and discovery associates regarding document review (0.2); confer with HM and PB regarding preparations for third set of production (0.2); ingest various client documents into review database for further review (0.4); prepare potential third set of production batches for HM and PB review (1.2); analyze document review progress and summarize same to PB (0.2).	4.40	325.00	1,430.00
9/10/24	JH	Create shell for Rhodium draft responses to Whinstone's interrogatories and Requests for Admission (1.0); continue document review to issue-tag emails [redacted] production sets sent to or from [redacted] (4.0).	5.00	325.00	1,625.00
9/10/24	PB	Coordinate collection, ingestion, and review of documents for upcoming productions to Whinstone (3.0); revise retention letter for expert T. Lewis (1.2); attend daily document review associate team call and follow-up discussion with HM and CS (0.5); teleconference and correspondence with VO regarding review strategy and staffing (0.8).	5.50	725.00	3,987.50
9/10/24	HM	Begin review of documents designated for further review (0.5); attend document review daily team meeting (0.2); confer with CH and PB regarding documents for potential production 3 (0.2); confer with T. Stefan, EB, JS, PB, and BA regarding amendments to engagement letter with Setec Investigations (0.5); continue drafting responses to Whinstone's first set of requests for production (3.0); draft first set of requests for admission for review by JS, BA, and PB (2.0); revise and circulate list of deadlines to Stris and LKC litigation teams (0.5); review and revise first set of interrogatories (0.3); correspond with AS, PB, BA, and JHA regarding filing procedures and pro hac vice applications (0.5); answer document review questions and update materials regarding review guidelines (0.8).	7.70	600.00	4,620.00
9/10/24	MJ	Attend document review daily team meeting (0.2); review assigned document batches (2.8).	3.00	480.00	1,440.00
9/10/24	VA	Attend document review daily team (0.2); review assigned document batches (9.8).	10.00	480.00	4,800.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/10/24	HS	Attend document review daily team meeting (0.2); review assigned document batches (5.8).	6.00	480.00	2,880.00
9/10/24	FF	Attend document review daily team meeting (0.2); review assigned document batches (9.8).	10.00	480.00	4,800.00
9/11/24	PS	Review [redacted] filings and confer with team regarding same (0.3); review emails regarding discovery (0.3).	.60	1250.00	750.00
9/11/24	EB	Review and respond to team correspondence regarding high priority action items including [redacted] (0.2); advise HM regarding revisions to text collection consulting engagement rider (0.1); correspond with VO, PB, and TT regarding case materials and instructions for deposition preparation and future project work (0.1).	.40	1100.00	440.00
9/11/24	BA	Confer with ERCOT expert C. Griffey, JS, HM, and Rhodium contacts regarding data and information requests (1.3); Attend teleconference with JS, HM, [redacted], and C. Griffey to discuss data needed for ERCOT expert analysis (1.1); attend further teleconference with JS and C. Griffey regarding data needed and discovery requests necessary for same (0.3); confer with JS, W. Thompson, J. Cohn, and client regarding [redacted] issues (1.0); research same (0.4); correspond with [redacted] and litigation team regarding Imperium subpoena (0.1); review draft interrogatories and confer with litigation team regarding same (0.3); review draft requests to admit, analyze exemplars for same, and correspond with HM, PB, and JS regarding revisions to same (0.4); correspond with HM, JS, and C. Griffey regarding discovery matters (0.3); confer with JS regarding affirmative discovery (0.1); confer with C. Griffey and JS regarding affirmative discovery/information needs (0.4); correspond with JS regarding email to M. Thomas, review and revise same, and correspond with bankruptcy counsel regarding status of protective order (0.1); correspond with PB regarding document production issues (0.1); correspond with HM regarding subpoena to Priority Power (0.1); revise draft second set of RFPs to add requests [redacted] (1.0).	7.00	1050.00	7,350.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/11/24	JS	Attend teleconference with BA, HM, [redacted] and C. Griffey to discuss data needed for ERCOT expert analysis (1.1); attend further teleconference with BA and C. Griffey regarding data needed and discovery requests necessary for same (0.3); attend teleconferences with BA regarding outstanding discovery issues on interrogatories, requests for admission, and requests for production, as well as ERCOT expert issues and next steps (1.5); draft requests for admission (3.5); review and revise interrogatories (1.1); review and revise second set of requests for production (0.6); review and evaluate draft brief regarding April 22 Notice of Termination and [redacted] in light of same (2.3); prepare for and attend teleconference with BA, W. Thompson, J. Cohn, [redacted], and [redacted] regarding [redacted] litigation (1.3) and further evaluate [redacted] and potential next steps (0.9); continue working on defensive deposition outlines (2.5).	15.10	875.00	13,212.50
9/11/24	CS	Begin drafting motion for partial summary judgment based on portions of April 22, 2024 notice of termination that are ineffective as a matter of law; review and analyze case law in support of the same (8.5).	8.50	725.00	6,162.50
9/11/24	PB	Prepare upcoming productions of custodial and centrally-maintained documents and correspondence regarding same (5.0); revise draft discovery requests to Whinstone US, Inc. regarding motion to assume (0.8)	5.80	725.00	4,205.00
9/11/24	SR	Continue conducting document review of potentially privileged documents.	8.30	650.00	5,395.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/11/24	HM	Attend teleconference with BA, JS, [redacted], and Charles Griffey of Peregrine to discuss data needed for ERCOT expert analysis (1.1); review and revise notes from meeting with Charles Griffey and circulate action items to BA and JS (0.5); continue revising and drafting Debtors' requests for admission, set one to Whinstone US, Inc. (3.3); draft Debtors' subpoena to Priority Power Management LLC and circulate to Stris & Maher and Lehotsky Keller Cohn teams (1.5); draft interrogatory about Whinstone's understanding of "Ercot market profitability (0.2); confer with PB and CH over email about how producing contracts at issue and then sending them to Charles Griffey (0.5).	7.10	600.00	4,260.00
9/11/24	PNY	Review assigned document batches (6.0).	6.00	480.00	2,880.00
9/11/24	TT	No Charge - Review [redacted] (0.9); review and analyze Debtors' Motion to Assume Executory Contracts with Whinstone (0.9); review Voluntary Petition for Chapter 11 Bankruptcy to assist with deposition preparation (0.9); review Declaration of David M. Dunn [redacted] (0.9).	3.60	480.00	N/C
9/11/24	VA	Review assigned document batches (8.0).	8.00	480.00	3,840.00
9/11/24	HS	Review assigned document batches (8.5).	8.50	480.00	4,080.00
9/11/24	FF	Review assigned document batches (10.0).	10.00	480.00	4,800.00
9/11/24	CHH	Review and analyze new client documents and update discovery database with same for document production (0.8); implement additional privilege highlighting (0.2); review documents in potential third production and pull potentially privileged ones for further review (0.6); review and edit list of correspondence between Whinstone and Rhodium regarding [redacted] (0.8); summarize correspondence from and to Whinstone in Whinstone's document production in email memorandum to JS in preparation for [redacted] (0.4); telephone call with [redacted] (0.3); begin reviewing [redacted] (Rhodium) emails for deposition preparation efforts (0.5).	3.60	325.00	1,170.00
9/11/24	JH	Continue reviewing documents to assist with Rhodium witness deposition preparation.	5.00	325.00	1,625.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/11/24	ASA	Review documents for JS to assist with preparation for forthcoming depositions of [redacted].	2.50	325.00	812.50
9/12/24	PS	Review emails regarding discovery (0.2).	.20	1250.00	250.00
9/12/24	BA	Correspond with litigation team regarding Imperium subpoena and with S. Lemmon to set up call (0.1); confer with JS and S. Lemmon regarding Imperium subpoena and related matters (0.6); confer with JS regarding same (0.1); review, draft, and revise affirmative discovery, including interrogatories, requests for admission, and requests to produce, and correspond with litigation team, bankruptcy counsel, and client regarding same, and as needed to oversee finalization of same, as well as related second production to Whinstone (5); correspond with client regarding [redacted] issues and [redacted] (0.6); correspond with C. Griffey regarding affirmative discovery needs (0.3); review and revise 3d party subpoena to Priority and correspond with client and litigation team as needed to oversee finalization of same (0.4).	7.10	1050.00	7,455.00
9/12/24	JS	Confer with BA and S. Lemmon regarding [redacted] subpoena and related matters (0.6); confer with BA regarding same (0.1); review, revise, and finalize RFAs, RFPs, and Rogs and associated exhibits (5.8); review and evaluate potential MSJ (1.4) and confer with W. Thompson regarding same (0.3); confer with potential safety expert and evaluate need for same (1.5).	9.70	875.00	8,487.50
9/12/24	CS	Review and analyze documents received from Whinstone relevant to [redacted] in anticipation of preparing him to be deposed.	7.00	725.00	5,075.00
9/12/24	PB	Call with expert T. Lewis regarding scope of upcoming damages report and follow-up correspondence regarding same (0.9); revise draft requests for admission to Whinstone US, Inc. regarding motion to assume (1.2); compile and prepare documents for production (2.6); call with J. Stokes regarding requests for admission (0.2).	4.90	725.00	3,552.50
9/12/24	SR	Continue conducting document review of potentially privileged documents (1.3); correspond with PB regarding status of the same (0.1); begin reviewing case materials in connection with preparations for [redacted] deposition (5.3).	6.70	650.00	4,355.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/12/24	HM	Attend document review daily team meeting (0.3); confer with VA, HS, PN, and FF via email about document tagging protocol (0.5); revise, finalize, and serve Debtors' intent to issue subpoena to Priority Power Management, form subpoena, and attachment to Whinstone US, Inc. (2.5); revise, finalize, and serve Debtors' requests for production, set two to Whinstone US, Inc.; revise, finalize, and serve Debtors' requests for admission, set one to Whinstone US, Inc. (3.3); confer with CH to create exhibits packet related to Debtors' requests for admission, set one to Whinstone US, Inc. (0.7); revise, finalize, and serve Debtors' interrogatories, set one to Whinstone US, Inc. (2.6).	9.90	600.00	5,940.00
9/12/24	PNY	Attend document review daily team meeting (0.3); review assigned document batches (9.7).	10.00	480.00	4,800.00
9/12/24	VA	Attend document review daily team (0.3); review assigned document batches (9.7).	10.00	480.00	4,800.00
9/12/24	HS	Attend document review daily team meeting (0.3); review assigned document batches (9.0).	9.30	480.00	4,464.00
9/12/24	FF	Attend document review daily team meeting (0.3); review assigned document batches (9.7).	10.00	480.00	4,800.00
9/12/24	CHH	Review and summarize P. Richison (Rhodium) documents in preparation for deposition (4.0); ingest various documents into discovery database for production (0.5); prepare, finalize, and run production set two (1.0); finalize various discovery requests (1.0).	6.50	325.00	2,112.50
9/12/24	JH	Continue document review to issue-tag emails [redacted] sent to or from [redacted].	2.00	325.00	650.00
9/12/24	ASA	No Charge - Submit inquiries and converse with hotel staff at properties in downtown Houston to find suitable accommodations for counsel and client during bankruptcy proceedings in November.	.80	325.00	N/C
9/13/24	EB	Review draft text message collection consulting engagement rider (0.1); correspond with BA and HM regarding revisions to same (0.1); review and begin proposing revisions to witness preparation [redacted] (1.0); correspond with JS and HM regarding same (0.1).	1.30	1100.00	1,430.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/13/24	VO	Attend zoom meeting with JS, P. Tomasco, members of Province, and counsel for [redacted] entities (0.8); confer with JS to get update, discuss progress on discovery, assignments, and next steps (0.7).	1.50	875.00	1,312.50
9/13/24	JS	Attend teleconference with co-counsel and P. Rosenblatt regarding subpoena and information request (0.7); attend teleconference with VO regarding discovery status and next steps (0.7); evaluate Foley correspondence regarding planned depositions and next steps in light of same (1.0); continue preparation for [redacted] depositions (4.3).	6.70	875.00	5,862.50
9/13/24	CS	Meet with SR to discuss progress on preparing materials to prepare Rhodium witnesses for depositions (0.3); continue reviewing and analyzing documents relevant to [redacted] in anticipation of preparing him for his deposition (6.0); continue drafting outline to prepare [redacted] to be deposed (0.9).	7.20	725.00	5,220.00
9/13/24	PB	Lead daily call with document review associate team regarding responsiveness review (0.2); quality-control review, analysis, and preparation of third, fourth, and fifth productions of documents to Whinstone (6.3).	6.50	725.00	4,712.50
9/13/24	SR	Continue reviewing case materials in connection with preparations for B. Cottrell deposition (5.0); attend videoconference with CS to discuss the same (0.1).	5.10	650.00	3,315.00
9/13/24	HM	Attend document review daily team meeting (0.2); perform quality check review of assigned batches (2.0).	2.20	600.00	1,320.00
9/13/24	TT	Conference with PB regarding assignement to analyze outside investor provisions in subscription and operating agreements (0.2); review Amendment to First Amended Operating Agreement for Rhodium 30MW (0.2); review Subscription Agreement for Rhodium 30MW (1.0); review Rhodium 30MW First Amended Operating Agreement (1.0); review Whinstone's Supplemental Reply in Support of Emergency Motion (0.5); review Hosting Agreement between Whinstone and Rhodium 30MW (1.5).	4.40	480.00	2,112.00
9/13/24	VA	Attend document review daily team (0.2); review assigned document batches (6.8).	7.00	480.00	3,360.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/13/24	HS	Attend document review daily team meeting (0.2); review assigned document batches (4.1).	4.30	480.00	2,064.00
9/13/24	FF	Attend document review daily team meeting (0.2); review assigned document batches (7.8).	8.00	480.00	3,840.00
9/13/24	CHH	Review and summarize [redacted] (Rhodium) produced documents in preparation for depositions.	5.00	325.00	1,625.00
9/13/24	JH	Finish document review to issue-tag emails [redacted] (5.0); correspond with AA regarding same (0.1); file new docket entries (0.3).	5.40	325.00	1,755.00
9/13/24	ASA	Continue review of client documents to assist JS with preparation for forthcoming depositions of Rhodium [redacted].	3.00	325.00	975.00
9/14/24	PS	Confer with JS regarding plan for offensive and defensive depositions.	.70	1250.00	875.00
9/14/24	EB	Review and respond to correspondence from JS regarding further revisions to deposition [redacted].	.10	1100.00	110.00
9/14/24	JS	Review and evaluate plan for offensive and defensive depositions (0.5); confer with PS regarding same (0.7); attend teleconference with W. Thompson regarding same and MSJ strategy (0.6).	1.80	875.00	1,575.00
9/14/24	HM	Correspond with JS regarding potential deposition witnesses (0.1); complete performing quality check of assigned batches (2.1); continue drafting Debtors' responses to Whinstone's requests for production (0.4).	2.60	600.00	1,560.00
9/14/24	PNY	Review assigned document batches (8.0).	8.00	480.00	3,840.00
9/15/24	PB	Prepare custodial and collected financial documents for inclusion in third, fourth, and fifth productions of documents.	1.40	725.00	1,015.00
9/15/24	HM	Begin quality check of additional document batches (1.9).	1.90	600.00	1,140.00
9/16/24	PS	Confer with JS regarding trial strategy.	1.40	1250.00	1,750.00
9/16/24	EB	Advise AA and correspond with Stris team, clients, and co-counsel regarding trial accommodations and planning.	.40	1100.00	440.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/16/24	BA	Correspond with JS, PB, and HM regarding status of discovery matters and communications with opposing counsel (0.2); confer with JS regarding pending discovery, proposed depositions, motion practice, and [redacted] (0.7); participate in teleconference with [redacted], J. Cohn, W. Thompson, [redacted], and [redacted] to discuss potential [redacted], confer with [redacted] regarding same, prepare analysis of issues relevant to same, and correspond with J. Cohn and with [redacted] regarding same (2.2); review proposed edits on protective order from Whinstone and HM's analysis of same, correspond with bankruptcy counsel and litigation team regarding response to same, and correspond with Whinstone regarding position on same (0.8); review plan from P. Brody for documents for expert T. Lewis and approve same (0.1); review proposed revision to vendor Setec's engagement letter and approve same (0.1); correspond with litigation team regarding Whinstone's proposed deposition list (0.1); review and revise deficiency letter to Whinstone regarding production (0.4); begin reviewing Whinstone's response to motion to assume (0.3).	4.90	1050.00	5,145.00
9/16/24	JS	Confer with BA regarding discovery status and next steps and related matters (0.7); review and evaluate draft deficiency letter regarding Whinstone productions (0.6); review and evaluate Foley edits to protective order (0.4); review and evaluate Whinstone response to motion to assume (1.7); confer with W. Thompson regarding same (0.7); confer with PS regarding trial strategy (1.4).	5.50	875.00	4,812.50
9/16/24	CS	Continue drafting motion for partial summary judgment and review case law relevant to the same.	6.90	725.00	5,002.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/16/24	PB	Lead daily strategy teleconference with discovery associate team regarding production issues (0.2); follow-up teleconference with H. Marsh and C. Huang regarding production sequencing and finalization (0.2); prepare documents for inclusion in fourth and fifth productions (5.7); teleconference with [redacted] HM, and CH regarding responses to Whinstone requests for Bitcoin mining data (0.8); teleconference with [redacted] HM, and CH regarding financial data for production (0.2); revise draft responses and objections to Whinstone's requests for production (1.0).	8.10	725.00	5,872.50
9/16/24	SR	Begin reviewing and analyzing witness preparation [redacted] in connection with [redacted] deposition (2.0); continue preparing for the same (1.5).	3.50	650.00	2,275.00
9/16/24	HM	Complete quality check of additional batches (3.6); attend document review daily team meeting (0.1); confer with PB and CH about privilege review protocol (0.4); attend portion of teleconference about [redacted] (0.5); attend teleconference with [redacted] and PB and CH to discuss financial information for discovery purposes (0.2); continue drafting Debtors' responses to Whinstone's requests for production (2.5); revise draft deficiency letter in response to Whinstone's document productions (1.2); revise and send updated contract rider to Todd Stefan of Setec Investigations (0.2).	8.70	600.00	5,220.00
9/16/24	PNY	Attend document review daily team meeting (0.2); review assigned document batches (7.8).	8.00	480.00	3,840.00
9/16/24	TT	Review and analyze Rhodium Private Placement Memorandum (2.0); correspond with PB regarding analysis of Amendment to First Operating Agreement; First Amended Operating Agreement; Subscription Agreement; Whinstone Supplemental Reply; Hosting Agreement between Whistone and Rhodium JV LLC (5.0).	7.00	480.00	3,360.00
9/16/24	VA	Attend document review daily team meeting (0.2); review assigned document barches (7.8).	8.00	480.00	3,840.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/16/24	HS	Review and analyze privilege protocol to prepare for privilege review (0.3); conduct privilege review and redaction of assigned batch (5.2).	5.50	480.00	2,640.00
9/16/24	FF	Attend document review daily team meeting (0.2); review assigned document batches (7.8).	8.00	480.00	3,840.00
9/16/24	CHH	Daily document review check-in with HM, PB, and discovery associates (0.1); confer with PB and HM regarding privilege review and setup of same (0.4); set up same (1.5); prepare potential production set five and quality control batches for same (1.5); edit production parameters in light of protective order to ensure compliance (0.5); draft memorandum on production protocol and quality control steps for same (2.0); attend teleconference with PB, HM, and Rhodium contacts regarding [redacted] data (0.7); attend teleconference with PB, HM, and Rhodium contacts regarding financial information document collection (0.2).	7.00	325.00	2,275.00
9/16/24	JH	Correspond with AA regarding ongoing document review of e-mail correspondence [redacted] in production sets (0.2); update docket for bankruptcy matter [redacted] (0.2).	.40	325.00	130.00
9/16/24	ASA	Assist HM and EB with finalization of agreement with Setec (0.1); continue review of assigned documents to assist JS with deposition preparation (3.2).	3.30	325.00	1,072.50
9/17/24	PS	Confer with JS regarding trial strategy.	1.00	1250.00	1,250.00
9/17/24	EB	Correspond with [redacted] regarding [redacted] (0.1); attend teleconference with [redacted] regarding same (0.3); correspond with Stris team to advise regarding same (0.1); correspond with BA, JS, and [redacted] regarding upcoming depositions (0.1); review and respond to team correspondence including regarding meeting to discuss same and high priority action items (0.1).	.70	1100.00	770.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/17/24	BA	Correspond with HM and with bankruptcy counsel regarding protective order (0.1); prepare for and participate in call with [redacted] regarding Whinstone demands for Rhodium employee information, and to update [redacted] on deposition and trial preparation, and convey update on same to JS, HM, and PB (0.6); review and revise RFP responses and correspond with HM and PB regarding same (0.5); confer with VO and W. Thompson regarding work product and [redacted] issues (0.5); confer with JS, HM, and PB regarding high priority action items, including document review and production and discovery responses (0.7); review subpoena to Rhodium from third parties and correspond with PB, HM, and JS regarding same (0.2).	2.60	1050.00	2,730.00
9/17/24	VO	Confer with W. Thompson regarding timeline materials for P. Tomasco (0.2); confer with W. Thompson and BA regarding same (0.5)	.70	875.00	612.50
9/17/24	JS	Review and revise deficiency letter (0.9) and confer with A. Swartz regarding same (0.1); confer with W. Thompson regarding MSJ strategy and next steps (0.3); attend teleconference with BA, PB, and HM regarding outstanding discovery and related issues (0.7); confer with PS regarding trial strategy (1.0); correspond with Stris and LKC teams regarding deposition strategy and planning (0.4).	3.40	875.00	2,975.00
9/17/24	CS	Review and analyze Rhodium's preliminary response to motion to assume contracts (0.9); continue drafting motion for partial summary judgment (4.3); draft declaration in support of motion for partial summary judgment (0.9).	6.10	725.00	4,422.50
9/17/24	PB	Review and analyze Whinstone response to motion to assume (1.1); teleconference with A. Swartz regarding motion to assume and document review status and strategy (0.3); analyze, prepare, and finalize document productions 3, 4, and 5 (5.0); revise engagement letter for damages expert T. Lewis (0.3); teleconference with BA, JS, and HM regarding discovery status and strategy (0.8)	7.50	725.00	5,437.50
9/17/24	SR	Continue reviewing case materials and notes to continue preparing for B. Cottrell deposition.	5.30	650.00	3,445.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/17/24	HM	Attend document review daily team meeting (0.4); revise Debtors' responses to Whinstone's requests for production (0.8); perform quality check of assigned batches (6.8); confer with HS, VA, FF, and PN over email about second-level privilege review and conduct research on [redacted] related to privilege (1.0); attend teleconference with PB, JS, and BA to discuss outstanding discovery items, privilege questions, and the response to the motion to assume (0.7); confer with PB over telephone about second-level privilege review (0.3).	10.00	600.00	6,000.00
9/17/24	PNY	Attend document review daily team meeting (0.4); review assigned document batches (3.6).	4.00	480.00	1,920.00
9/17/24	VA	Attend document review daily team meeting (0.4); review assigned document batches (7.6).	8.00	480.00	3,840.00
9/17/24	HS	Attend document review daily team meeting (0.4); review assigned document batches (7.6).	8.00	480.00	3,840.00
9/17/24	FF	Attend document review daily team meeting (0.4); review assigned document batches (7.6).	8.00	480.00	3,840.00
9/17/24	CHH	Finalize and run production sets 3 and 4 (4.2); daily check-in with PB, HM, and discovery associates regarding document review and next steps for privilege review (0.4).	4.60	325.00	1,495.00
9/17/24	JH	Update bankruptcy docket.	.50	325.00	162.50
9/17/24	ASA	Continue review and tagging of [redacted] emails as requested by JS to assist with deposition preparation (1.3).	1.30	325.00	422.50
9/18/24	EB	Review and propose revisions to E. Brown engagement letter (0.4); correspond with BA, VO, and JS regarding same and approval timing (0.1); review and approve revised version of same (0.1); attend teleconference with BA and JS regarding high priority discovery-related and strategic action items including RFP and interrogatory responses, expert reports, and trial coverage (0.5); attend teleconference with Stris & LKC Teams regarding Whinstone deponents and documents pertaining to preparation of Rhodium witnesses (1.0); review and correspond with BA and JS regarding revisions to correspondence to opposing counsel concerning deponents (0.1); attention to valuations document request (0.2).	2.30	1100.00	2,530.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/18/24	BA	Confer with JS regarding case strategy, including experts and depositions (0.2) and confer with JS and EB regarding same (0.5); participate in teleconference with litigation team to discuss depositions, trial witnesses, and communications with opposing counsel regarding same (1.0); confer with EB, JS, and VO regarding expert retentions (0.1); confer with PB regarding document review and production and RFP responses (0.9), and with PB and JS regarding same (0.1); correspond with PB and with HM regarding document review and production and RFP responses, and with PB, HM, and JS regarding same (0.4); convey potential analysis relevant to summary judgment filing to PB, HM, and JS (0.1); correspond with EB, HM, JS, and PB regarding strategy for RFP responses (0.1); review, draft, and revise RFP responses (3.2).	6.60	1050.00	6,930.00
9/18/24	VO	Attend portion of team deposition planning call (0.5); confer with JS and [redacted] regarding witness attendance at trial (0.4).	.90	875.00	787.50
9/18/24	JS	Confer with BA about [redacted] and trial (0.2); confer with BA and EB regarding same (0.5); attend team call regarding deposition strategy (1.0); review prior witness lists and disclosures and prepare deposition plan (1.5); review and evaluate motion for protective order (1.1); correspond with Foley regarding deposition planning and protective order (0.5); continue review of documents and outlining for [redacted] deposition prep (6.3); review and revise safety expert engagement letter (0.6) and correspond with BA and EB (0.3) and safety expert (0.5) regarding same.	12.50	875.00	10,937.50
9/18/24	CS	Participate in deposition strategy meeting (0.7); review and analyze edits to motion for partial summary judgment and continue revising the same (2.1); gather and organize exhibits in support of motion for partial summary judgment (0.6); continue reviewing analyzing documents relevant to [redacted] in anticipation of preparing him for his deposition (1.5).	4.90	725.00	3,552.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/18/24	PB	Attend daily review meeting with discovery associate team (0.3); review, finalize, and serve production 3 (1.1); attend teleconference with case team regarding offensive and defensive deposition strategy (1.0); teleconference with BA regarding responses to requests for production (0.6); prepare fourth and fifth productions of documents (1.6); review custodial documents of [redacted] for production and deposition preparation (3.1); client correspondence regarding final document collection items (0.4).	8.10	725.00	5,872.50
9/18/24	SR	Continue reviewing case materials and notes to prepare for [redacted] deposition (3.8); attend team call with EB, BA, JS, VO, PB, HM, JHA, AA, CH, and LKC team members to discuss deposition and witness strategy (0.7).	4.50	650.00	2,925.00
9/18/24	HM	Attend document review daily team meeting (0.3); attend portion of Stris & Maher LLP and Lehotsky Keller Cohn LLP litigation team call to discuss trial witness and deposition strategy (0.7); revise Debtors' responses to Whinstone's requests for production (6.4); begin quality check of assigned batches (1.2); confer with T. Stefan regarding processing of text messages for review and potential production (0.1).	8.70	600.00	5,220.00
9/18/24	PNY	Attend document review daily team meeting (0.3); review assigned document batches (7.7).	8.00	480.00	3,840.00
9/18/24	VA	Review assigned document batches (8.0).	8.00	480.00	3,840.00
9/18/24	HS	Attend document review daily team meeting (0.3); review assigned document batches (7.5).	7.80	480.00	3,744.00
9/18/24	FF	Attend document review daily team meeting (0.3); review assigned document batches (7.5).	8.00	480.00	3,840.00
9/18/24	MV	Attend document review daily team meeting (0.3); review assigned document batches (7.5).	3.00	400.00	1,200.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/18/24	CHH	Ingest various client financial documents into discovery database for review and production (0.2); update privilege highlighting to facilitate document review (0.1); create new privilege review sets for review (0.3); finalize production set 3 (2.0); emails with A. Swartz (Lehotsky) regarding documents for expert review (0.2); finish drafting [redacted] on [redacted] productions and privilege review and share same with PB and HM for further review (1.0); emails with JS and JHA regarding further review of [redacted] documents in preparation for depositions (0.1); teleconference with MV regarding discovery database and [redacted] (1.0); attend teleconference with VO, PB, JS, SR, EB, HM, CS, BA, ASA, JHA and Lehotsky Keller Cohn co-counsel (W. Thompson, A. Swartz, T. Disher, M. Frederick, J. Cohn) regarding deposition planning and witness list preparation (1.1).	6.00	325.00	1,950.00
9/18/24	JH	Begin expanded document review of e-mail correspondence sent to and from [redacted] (4.0); Attend teleconference with VO, PB, JS, SR, EB, HM, CS, BA, AA, CHH, JHA and Lehotsky Keller Cohn co-counsel (W. Thompson, A. Swartz, T. Disher, M. Frederick, J. Cohn) regarding deposition planning and witness list preparation (1.0); prepare notes for same (0.3).	5.30	325.00	1,722.50
9/18/24	ASA	Log recent developments in [redacted] at request of HM (0.5); continue review and tagging of documents to assist [redacted] with deposition preparation (3.0); No Charge - attention to case logistics and travel accommodations (0.5).	3.50	325.00	1,137.50
9/19/24	PS	Review summary judgment draft and provide initial comments.	.30	1250.00	375.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/19/24	EB	Call with BA (0.4); review and propose revisions to RFP responses (0.8); correspond with BA regarding same (0.1); further correspond with BA regarding implementation of same and advise PB regarding assignment for TT (0.1); attention to finalization of [redacted] including correspondence with PS, VO, JS, ASA, and [redacted] regarding same (0.2); confer with VO and review status update regarding retention application (0.1); review revised objections (0.1); propose further revisions to objections to [redacted] requests (0.3).	2.10	1100.00	2,310.00
9/19/24	BA	Correspond with A. Swartz and litigation team, and with [redacted], regarding contact information for subpoena targets (0.2); review update from [redacted] on [redacted], and correspond with [redacted] regarding same, including update on [redacted] (0.2); convey draft RFP responses to [redacted] (0.1); review suggested revisions to RFPs from K. Hutchins, correspond with litigation team regarding same, including format of responses, general objections, and consolidated versus separate responses, research propriety of general objections, confer with EB regarding strategy for RFP responses, including general objections and consolidated response, and correspond with K. Hutchins regarding recommended approach (2); correspond with PB regarding document production issues, review proposed cover letter for production, and approve same (0.2); correspond with PB regarding second day hearing and objections [redacted] (0.1); correspond with HM and team regarding revisions to RFP responses, review suggested revisions to same from EB, and correspond with EB regarding same (0.3); review and comment on draft responses to interrogatories prepared by HM and correspond with HM, PB, and JS regarding same (0.9); review and revise responses to requests for production (1.9); correspond with PB and JS regarding meet and confer request to Foley (0.1).	6.00	1050.00	6,300.00
9/19/24	VO	Confer with [redacted] regarding witnesses for trial (0.3); emails with JS, HM, and [redacted] regarding same (0.2).	.60	875.00	525.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/19/24	JS	Work on deposition outline for [redacted] deposition defense and review [redacted] and prior transcripts in connection with same (8.8); confer with CS regarding [redacted] draft (0.3); review same (0.5); further review and evaluate motion for protective order (0.5).	10.10	875.00	8,837.50
9/19/24	CS	Revise motion for partial summary judgment (3.5); meet with JS to discuss revisions to motion for partial summary judgment (.3).	3.80	725.00	2,755.00
9/19/24	PB	Analyze and prepare documents collected from Rhodium for production (1.8); review potentially-privileged documents and prepare production 6 (1.6); teleconference with [redacted] HM, and CS regarding miner data collection (0.3); teleconference with A. Swartz regarding expert strategy (0.3) analyze documents for deposition preparation of [redacted] (2.4).	6.40	725.00	4,640.00
9/19/24	SR	Continue reviewing case materials and notes to prepare for and outline [redacted] deposition.	7.00	650.00	4,550.00
9/19/24	HM	Attend document review daily team meeting (0.3); revise Debtors' responses to Whinstone's requests for production (0.7); draft Debtors' responses to Whinstone's first set of interrogatories (1.5); finish performing quality check of assigned batches (1.6).	4.10	600.00	2,460.00
9/19/24	PNY	Attend document review daily team meeting (0.3); review assigned document batches (7.7).	8.00	480.00	3,840.00
9/19/24	VA	Review assigned document batches.	8.00	480.00	3,840.00
9/19/24	HS	Attend document review daily team meeting (0.3); review assigned document batches (5.8).	6.10	480.00	2,928.00
9/19/24	FF	Review assigned document batches.	8.00	480.00	3,840.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/19/24	MV	Review [redacted] regarding privilege log requirements (0.5); correspondence with litigation team regarding [redacted] fields required for privilege log and next steps (0.5); continue review of defensive document review memorandum (0.5); review [redacted], per attorney instruction (0.5); review [redacted] privilege and issue tags and create saved search in preparation for privilege log (1.0); call with CH regarding search parameters and revise saved search for privilege log (1.0).	4.00	400.00	1,600.00
9/19/24	CHH	Attend teleconference with PB, HM, and Rhodium [redacted] regarding miner data collection (0.4); finalize production set 4 (2.6); prepare and finalize production overlays with additional custodian information for productions 1-3 (2.0); correspond with with [redacted] regarding same (0.1); correspond with PB regarding same (0.3); review and upload new client documents into database for production (0.3); correspond with MV regarding discovery tasks including privilege log (0.3); attend daily document review check-in with HM, PB, and discovery associates (0.2).	6.20	325.00	2,015.00
9/19/24	JH	Continue reviewing productions to identify materials for deposition preparation (3.5); review CHH memorandum regarding preparing production sets for service (1.0).	4.50	325.00	1,462.50
9/20/24	EB	Correspond with (0.1) and attend teleconference with (0.3) BA regarding further revisions to RFP responses; propose further revisions to same (0.1); correspond with BA and HM regarding finalization of same (0.1).	.60	1100.00	660.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/20/24	BA	Confer with EB regarding responses to requests for production (0.3); continue reviewing and revising responses to Whinstone's requests for production, correspond and confer as needed with HM, EB, JS, A. Davis, and PB to supervise finalization and service of same, and review near-final responses to approve service of same (4.2); confer with PB regarding discovery and production issues (0.3); correspond with HM and PB regarding document review and production (0.2); review and revise draft responses to interrogatories (0.8); correspond with AA and with M. Smith as necessary to assist with transferring documents and data to C. Griffey and correspond with C. Griffey regarding meeting (0.2); review Riot's response to subpoena and correspond with W. Thompson regarding same (0.2); correspond with team and Arbitrator regarding Arbitrator's request for update on status (0.1).	6.30	1050.00	6,615.00
9/20/24	JS	Continue deposition defense outlining and document review in connection with same (3.0); correspond with SR and CS regarding deposition prep status (0.1); attend teleconference with BA regarding discovery status and next steps (0.1); review [redacted] responses (0.3).	3.50	875.00	3,062.50
9/20/24	CS	Continue revising motion for summary judgment in response to comments from PS and JS (1.5); continue reviewing documents relevant to [redacted] and drafting outline of the same in anticipation of preparing him to be deposed (4.0).	5.50	725.00	3,987.50
9/20/24	PB	Teleconference with [redacted] regarding potential production issues (0.2); prepare fifth and sixth productions of documents and team correspondence regarding same (6.4); teleconference with BA regarding production preparation and responses to requests for production (0.2).	6.80	725.00	4,930.00
9/20/24	SR	Review temporary injunction hearing transcripts and exhibits to begin outlining list of relevant safety incidents and follow-up actions in connection with deposition preparations (7.0); correspond with CS and JS regarding the same (0.3).	7.30	650.00	4,745.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/20/24	HM	Attend document review daily team meeting (0.1); update log of expert materials (0.2); revise, finalize, and serve responses to Whinstone's first sets of RFPs (2.1); complete quality check of additional production documents (1.2); confer with T. Stefan (Setec), CH and PB about review of collected text messages (0.3).	3.90	600.00	2,340.00
9/20/24	PNY	Attend document review daily team meeting (0.2); review assigned documents including text message batches (7.8).	8.00	480.00	3,840.00
9/20/24	TT	Review and analyze transcripts of First Day Motions and April 2024 AAA Hearing to assist in preparation for depositions of [redacted].	2.00	480.00	960.00
9/20/24	VA	Review assigned document batches.	8.00	480.00	3,840.00
9/20/24	HS	Attend document review daily team meeting (0.1); review additional assigned documents (6.3).	6.40	480.00	3,072.00
9/20/24	FF	Attend document review daily team meeting (0.1); review assigned document batches (7.9).	8.00	480.00	3,840.00
9/20/24	MV	Revise saved search and search parameters for privilege log, further revise issue tags and fields for download of log, review and format draft log and required information fields (2.0); further review of [redacted] (0.5); draft [redacted] regarding privilege log (1.0); teleconference with PB regarding review of draft privilege log and further edits (0.5); create list of all Privilege tags [redacted] (0.5); further revise and review draft log, per attorney instructions (1.0).	5.50	400.00	2,200.00
9/20/24	CHH	Set up various QC searches for production sets 6 and 7 (0.5); collect hearing transcripts for client review in preparation for depositions (0.8); coordinate with QH to upload Whinstone's production sets into discovery platform for further review (1.0); emails with A. Swartz (Lehotsky) regarding same in anticipation of further offensive document review (0.1); emails with T. Stefan (Setec) regarding text message data collection and review (0.2); upload [redacted] text messages into database for further review and [redacted] (3.0); confer with PB regarding Whinstone complaints regarding initial document productions and troubleshoot same (0.6).	6.20	325.00	2,015.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/21/24	BA	Convey discovery correspondence to [redacted] and correspond with [redacted] regarding [redacted].	.10	1050.00	105.00
9/21/24	JS	Outline trial arguments and begin high-level order of proof outline.	2.90	875.00	2,537.50
9/21/24	PB	Preparation of custodial and collected documents for production to Whinstone and correspondence regarding same.	2.70	725.00	1,957.50
9/21/24	HS	Review assigned text message document batches.	3.10	480.00	1,488.00
9/22/24	EB	Correspond with BA, VO, and JS regarding inspection request and status of potential witness [redacted] (0.1); review materials concerning (0.2) and correspond with CS and PB regarding (0.1) versions of data center rules [redacted]; review and respond to correspondence with BA, VO, and JS regarding issues and positions in advance of upcoming meet and confer teleconference with opposing counsel (0.1).	.50	1100.00	550.00
9/22/24	BA	Research requests for inspection of premises under Rule 34, analyze issues with Whinstone's request, and convey analysis to litigation team (0.8); correspond with PB, JS, and HM regarding analysis of privilege issues with respect to document production (0.3); correspond with EB, VO, and JS regarding [redacted] and potential issues related to same, and regarding limits on number of depositions (0.2); confer with VO regarding [redacted] (0.1); research issues related to unavailable witnesses and correspond with EB, VO, and JS regarding same (0.3).	1.70	1050.00	1,785.00
9/22/24	VO	Prepare email to EB, BA, and JS regarding status of [redacted] (0.2); confer with BA regarding witness representation issues and emails with team regarding same (0.3).	.50	875.00	437.50
9/22/24	JS	Continue [redacted] deposition prep and outlining trial strategy in light of and in connection with same.	3.60	875.00	3,150.00
9/22/24	PB	Preparation of custodial and collected documents for production and team correspondence regarding same.	3.90	725.00	2,827.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/23/24	PS	Prepare for (1.8) and confer with (0.4) JS and CS regarding motion for partial summary judgment.	2.20	1250.00	2,750.00
9/23/24	EB	Review and analyze case materials in support of expert support (1.0); prepare for (0.1) and attend (0.6) portion of teleconference with ERCOT expert; correspond with BA, JS, HM, and HJA regarding additional documents for ERCOT expert (0.1); review correspondence from opposing counsel concerning general objections and correspond with BA regarding response to same (0.1); correspond with BA, PB, and HM regarding tracking of materials sent to experts (0.2); attention to case management (0.1); correspond with BA and JS regarding response to discovery disputes concerning third party subpoenas and inspection requests (0.2); begin reviewing and commenting on draft interrogatory responses (0.9).	3.30	1100.00	3,630.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/23/24	BA	Review privilege question and correspond with PB regarding same (0.1); confer with JS regarding discovery matters and high priority action items (0.9); prepare for (0.4) and participate in teleconference (0.7) with expert C. Griffey; confer with CS, JS, and SR regarding strategy for deposition preparation and discovery correspondence, and correspond with SR regarding discovery correspondence (0.5); review discovery correspondence from Whinstone's counsel, and correspond with PB, EB, and JS regarding same (0.5); correspond with JS, PB, and HM regarding preparation for meet and confer with opposing counsel and review updates on same (0.4); confer with JS regarding strategy for discovery disputes, including deposition planning and request for inspection (0.5); correspond with [redacted] JH, and C. Griffey as needed to arrange upload of data and files (0.3); correspond with HM, EB, and JH regarding tracking of expert materials (0.2); correspond with PB and JS regarding Whinstone's demand for native word files and response to same (0.1); draft proposed response to Whinstone's counsel regarding request for inspection, convey same to team for review, [redacted], and email from Whinstone's counsel requesting update on same (0.8); review request from arbitrator regarding hearing dates and convey proposed response to bankruptcy counsel (0.1); continue reviewing and revising interrogatory responses (0.4).	5.80	1050.00	6,090.00
9/23/24	JS	Calls with BA regarding meet and confer issues, discovery status and next steps, and deposition preparation (1.5); attend videoconference with BA, CS, and SR regarding B. Cottrell and P. Richison deposition preparation and discovery response letter (0.5); Zoom with CS and PS regarding motion for summary judgment (0.4); prepare for and attend meet and confer with Foley regarding motion for protective order and depositions (4.0); evaluate next steps in light of meet and confer and prepare follow up correspondence and associated strategy in connection with same (4.0); evaluate outstanding document discovery issues and correspond with PB and BA regarding same (0.8).	11.60	875.00	10,150.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/23/24	CS	Attend videoconference with BA, JS, and SR regarding deposition preparation (0.5); meet with JS and PS to discuss motion for partial summary judgment (0.4); revise motion for partial summary judgment (2.1); review and analyze documents relevant to [redacted] and [redacted] in anticipation of preparing them for their depositions (2.1).	5.10	725.00	3,697.50
9/23/24	PB	Prepare production of documents related to [redacted] (0.8); prepare and finalize upcoming productions of custodial and collected documents in response to Whinstone requests for production (5.3); analysis of Whinstone positions regarding production of Word documents and correspondence regarding same (1.5); supervisory review potentially-privileged documents in preparation to draft privilege log and for production (1.8); prepare production of financial information and correspondence with client regarding same (1.2); review and analysis of [redacted] text messages for production (0.9); analysis of materials for expert use and transmission of same (1.0)	11.60	725.00	8,410.00
9/23/24	SR	Attend portion of videoconference with BA, JS, and CS regarding deposition preparations and outstanding discovery-related actions items (0.4); review and analyze discovery responses and related deficiency correspondence (6.1).	6.50	650.00	4,225.00
9/23/24	HM	Attend document review daily team meeting (0.3); attend teleconference with ERCOT expert C. Griffey, BA, EB, and JHA to regarding materials for analysis (0.6); attend meet-and-confer teleconference with JS and AA, and Whinstone's counsel (0.4); continue drafting and revising responses to Whinstone's first sets of interrogatories (2.5); begin reviewing and analyzing text messages of [redacted] (3.7); begin performing quality check of additional document batches (1.5).	9.00	600.00	5,400.00
9/23/24	PNY	Attend document review daily team meeting (0.3); review assigned document batches (7.7).	8.00	480.00	3,840.00
9/23/24	TT	Review and analyze transcripts of April 2024 AAA Hearing and March 2024 Temporary Injunction Hearing Volume 1 to assist in preparation for depositions of [redacted].	2.00	480.00	960.00
9/23/24	VA	Continue reviewing assigned documents.	8.00	480.00	3,840.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/23/24	HS	Attend portion of document review daily team meeting (0.2); continue reviewing assigned documents (5.0).	5.20	480.00	2,496.00
9/23/24	FF	Attend portion of document review daily team meeting (0.2); review assigned documents (7.8).	8.00	480.00	3,840.00
9/23/24	MV	Begin review of draft privilege log and identify entries for further attorney review (6.0); correspond with review team regarding sorting family documents (0.5); assist with sorting and saving of same in chronological order (0.5).	7.00	400.00	2,800.00
9/23/24	CHH	Assign various documents in discovery database to discovery associates for further review (0.2); set up review set containing redacted documents coded for production for further quality checks (0.3); review correspondence with opposing counsel and update internal production log accordingly (0.1); update document collection memorandum to keep track of documents collected for production (0.2); daily document review check-in with HM and discovery associates (0.2); review and analyze potential documents for production set eight and identify issues with same for PB further review (0.5); prepare production 5 for production (2.6); review [redacted] (Rhodium) documents in preparation for deposition (2.0).	6.10	325.00	1,982.50
9/23/24	JH	Prepare ShareFile folder with relevant contracts, pleadings in the bankruptcy and arbitration dockets, and rhodium usage data for expert C. Griffey's review at BA request (2.0); attend teleconference with BA, EB, HM, JS, and expert Charles Griffey to review [redacted] for his upcoming expert report (0.8); prepare notes for the same (0.7); request transcript of [redacted] status conference for HM (0.9).	4.40	325.00	1,430.00
9/23/24	ASA	Attend meet and confer with JS, HM, and opposing counsel (0.4); record notes and circulate with team (0.1); attention to contact list and [redacted] (1.5).	2.00	325.00	650.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/24/24	EB	Review correspondence to opposing counsel on various discovery issues and correspond with BA and JS regarding revisions to same (0.1); begin reviewing and analyzing materials for ERCOT and damages experts (2.8); correspond with PB regarding same and upcoming teleconference with damages expert (0.1); correspond with BA regarding verification of interrogatory responses (0.1).	3.10	1100.00	3,410.00
9/24/24	BA	Review and analyze issues relating to text message production and correspond with PB regarding same (0.4); correspond with JS, EB, W. Thompson and team regarding [redacted] Whinstone's late request for inspection (0.3); correspond with Arbitrator regarding hearing dates (0.1); correspond with JS regarding issues for weekly client/counsel call (0.1); participate in teleconferences with client team and client team, litigation and bankruptcy counsel, to discuss alleged issues and action items including [redacted] (1.7); correspond with JS regarding response to Whinstone's counsel on multiple discovery matters (0.2); continue reviewing and revising interrogatory responses, correspond with PB regarding same, and convey draft of same to client for review (2.6); correspond with JS, HM, and PB regarding materials provided to expert witness E. Brown and production of same (0.1); correspond with M. Smith regarding ERCOT data (0.2); review correspondence from JS to Whinstone's counsel regarding discovery matters (0.1).	5.80	1050.00	6,090.00
9/24/24	JS	Call with [redacted] regarding retention of safety expert (0.2); call with W. Thompson regarding outstanding discovery issues (0.4); zoom with client and attorney teams regarding Whinstone allegations of safety and OSHA issues (0.7); zoom with client and attorney teams regarding outstanding discovery issues and [redacted] (1.0); revise and prepare further correspondence to Foley regarding outstanding document discovery, deposition, and related issues (2.7); begin outlining issues for safety expert report (3.1); review and confer with [redacted] regarding document discovery [redacted] in connection with substantial completion deadline (0.4); review revised motion for partial summary judgment (0.4).	8.90	875.00	7,787.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/24/24	CS	Participate in meeting with client and legal team to obtain safety and maintenance update on issues raised in February 2024 letter from Whinstone (0.8); revise motion for partial summary judgment to incorporate feedback from JS and PS (2.2); review and analyze documents relevant to Brendan Cottrell in anticipation of preparing him for his deposition (4.4).	7.40	725.00	5,365.00
9/24/24	PB	Prepare production of documents regarding inter-company agreements (0.8); revise draft interrogatory responses (0.5); prepare production of corporate go-get documents (2.3); prepare production of bank statements (2.9); call with HM and T. Stefen regarding text message production (0.2); prepare seventh production of documents to Whinstone (1.3).	8.00	725.00	5,800.00
9/24/24	SR	Attend portion of videoconference with [redacted], LKC team, and Stris team to discuss safety, AUP, and OSHA allegations and site inspection request (0.7); draft correspondence in response to Sept. 23 correspondence from opposing counsel regarding discovery deficiencies (3.9).	4.60	650.00	2,990.00
9/24/24	HM	Attend document review daily team meeting (0.1); attend portion of teleconference with Stris, LKC, and Rhodium regarding safety allegations (0.7); complete quality check of additional documents (3.8); attend teleconference with A. Davis, AA, and J. Ledoux regarding response to subpoena (0.4); draft summary of same for BA, JS, PB, A. Swartz, W. Thompson, M. Rothrock, and A. Davis (0.4); attend teleconference with T. Stefan (Setec) regarding processing and review of text messages (0.4).	5.80	600.00	3,480.00
9/24/24	TT	Review and analyze transcripts of Temporary Injunction Hearings Vol 1 and Vol 2 to assist in preparation for depositions of [redacted].	1.50	480.00	720.00
9/24/24	MV	Continue review of draft privilege log and document potential issues and questions for further discussion with attorney, teleconference with attorney regarding the same (1.0); continue revisions and format fields on draft privilege log (3.0); revise [redacted] privilege tags on draft log (3.0).	7.00	400.00	2,800.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/24/24	CHH	Finalize productions 5 and 6 (2.0); prepare potential production 8 for attorney QC (1.0); upload various client documents into discovery database for further review and production (0.2); emails with [redacted] regarding [redacted] redaction [redacted] (0.1); review discovery database for potentially privileged financial documents and confer with HM regarding same (0.2); review [redacted] (Rhodium) documents in preparation for deposition (2.2); confer with PB regarding document redactions (0.1); set up further privilege reviews in preparation for privilege log (0.4).	6.20	325.00	2,015.00
9/24/24	JH	Update bankruptcy docket.	.90	325.00	292.50
9/24/24	ASA	Attend call with HM and J. Ledoux regarding subpoena compliance and prepare and circulate notes regarding same (0.5).	.50	325.00	162.50
9/25/24	PS	Review and revise latest draft partial summary judgment motion.	1.90	1250.00	2,375.00
9/25/24	EB	Confer with BA regarding proposed verification language and exemplars (0.1); attend portion of teleconference with BA, JS, HM, LKC, and [redacted] regarding interrogatory responses (0.6); review and analyze materials for ERCOT and Damages experts (1.0).	1.70	1100.00	1,870.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/25/24	BA	Participate in teleconference with PB, HM, and Stoneturn expert team to discuss forthcoming opinions and document/data needs (0.9); prepare for (0.2) and participate in teleconference with client team and litigation team to review and discuss [redacted] (1.1); confer with PB, [redacted] regarding interrogatory responses (0.7); confer with PB regarding production and discovery matters (0.2); correspond with HM regarding third party subpoenas and protective order (0.1); review discovery correspondence from Whinstone's counsel and correspond with JS and litigation and bankruptcy counsel regarding strategy for responding to same, including [redacted] (0.5); correspond with EB regarding interrogatory verification language, review exemplars of same, convey same to [redacted] for review, and convey same to bankruptcy counsel for review (0.3); correspond with JS regarding interrogatory responses and discovery matters (0.3); correspond with HM regarding document collection for C. Griffey (0.2).	4.70	1050.00	4,935.00
9/25/24	JS	Draft and review correspondence and evaluate strategy on high-priority discovery issues (7.4); review and revise introduction to motion for summary judgment (1.5); zoom with attorney and client teams regarding [redacted] responses (1.0); zoom with Stris and LKC teams regarding Whinstone production deficiencies and text messages (0.7); evaluate possible summary judgment arguments regarding [redacted] (2.5).	13.10	875.00	11,462.50
9/25/24	CS	Review and analyze documents relevant to [redacted] in anticipation of preparing him for his deposition and continue drafting outline of the same (6.1); review and analyze transcript of [redacted] testimony during March 1, 2024 hearing (2.0).	8.10	725.00	5,872.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/25/24	PB	Teleconference with C. Huang regarding native Word document production (0.4); prepare productions of documents in anticipation for substantial completion deadline (5.5); attend discovery teleconference with client executive team regarding status and responses to interrogatories (1.0); attend follow-up call with [redacted] regarding financial document discovery (1.0); further follow-up teleconference with [redacted] regarding data requests (0.8); teleconference with expert T. Lewis and team regarding financial expert report (0.9).	9.60	725.00	6,960.00
9/25/24	SR	Revise and incorporate JS comments in draft correspondence in response to Sept. 23 correspondence from opposing counsel regarding discovery deficiencies (3.2); correspond with team regarding the same (0.1).	3.30	650.00	2,145.00
9/25/24	HM	Update EB regarding status and high priority action items (0.4); organize and refine expert materials folders (0.4); update expert materials log (0.5); attend teleconference with PB, BA, and Stoneturn to discuss materials and information needed for expert report (0.8); draft and send email to [redacted] regarding collection of [redacted] (0.1); attend teleconference with BA, PB, EB, JS, and Rhodium team to discuss [redacted] responses (1.1); attend portion of teleconference with A. Swartz, W. Thompson, JS, and M. Rothrock to discuss deficiency letter (0.4); review and respond to team correspondence regarding remaining discovery and upcoming substantial completion deadline (1.5); review, analyze, and prepare documents for ERCOT expert C. Griffey (3.1); confer with PB about final productions of documents (0.5); correspond with counsel for Priority Power Management and J. Ledoux about protective order (0.3); review and respond to correspondence with discovery associates about remaining document review tasks (1.2).	10.30	600.00	6,180.00
9/25/24	PNY	Review assigned document batches.	2.00	480.00	960.00
9/25/24	TT	Review and analyze transcript of Temporary Injunction Hearing Vol 2 to assist in preparation for depositions of [redacted].	1.50	480.00	720.00

Stris & Maher LLP

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Date	Tkpr	Description	Hours	Rate	Amount
9/25/24	VA	Review assigned privilege review batches.	8.00	480.00	3,840.00
9/25/24	HS	Review assigned privilege review batches.	4.20	480.00	2,016.00
9/25/24	FF	Review assigned privilege review batches.	8.00	480.00	3,840.00
9/25/24	MV	Continue revising draft privilege log [redacted] (2.0); continue highlighting of document entries for further attorney review [redacted] (2.0); edit template fields [redacted] (0.5).	4.50	400.00	1,800.00
9/25/24	CHH	Review correspondence between team and [redacted] (Rhodium) regarding further document collection and facilitate same (0.2); set up further rounds of privilege review and confer with HM and PB regarding same (0.5); upload various client documents into discovery database in preparation for production (0.3); create various searches of documents marked for [redacted] attorney review (0.3); set up final checks for production set 7 and finalize same in conference with PB (2.0); email with PB regarding production 8 set up (0.2); emails with discovery associates regarding privilege review (0.2); [redacted] finalize production set 6 (1.0); emails with HM and QH regarding Whinstone's fifth production (0.2); review [redacted] (Rhodium) documents in preparation for depositions and confer with CS regarding same (1.0).	5.90	325.00	1,917.50
9/26/24	EB	Review response to deficiency letter (0.1); correspond with BA and JS regarding same and [redacted] (0.1); attention to case management (0.4); review proposed verification language from K. Hutchins and correspond with BA regarding same (0.1); review and correspond with BA regarding further revised interrogatory responses (0.5).	1.20	1100.00	1,320.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/26/24	BA	Correspond with JS and EB regarding strategy for response to Whinstone's inspection demand and review Whinstone's motion regarding same (0.6); correspond with JS, EB, and team regarding response to Whinstone's deficiency letter and [redacted] (0.3); correspond with HM regarding transmittal of documents to C. Griffey and with M. Smith regarding call with C. Griffey (0.1); continue reviewing and revising interrogatory responses, correspond with SR and PB regarding revisions to same, confer with PB regarding strategy for same, correspond with litigation team and with bankruptcy counsel regarding same, including verification and [redacted] responses (2.5); confer with JS regarding opposition to inspection request, convey research to JS, review draft of opposition, and correspond with JS and team regarding same (0.4); confer with PB regarding status of outgoing productions and substantial completion (0.4); correspond with [redacted] regarding data for C. Griffey and correspond with JS regarding same (0.1); review draft deficiency letter to Whinstone (0.1); begin reviewing Whinstone's responses to RFPs (0.2).	4.70	1050.00	4,935.00
9/26/24	VO	Review and evaluate draft letter to [redacted] (0.1); emails with [redacted] regarding same (0.1); review [redacted] email response to [redacted] (0.3); prepare proposed revisions to letter (0.2); prepare email to [redacted] regarding same (0.2); confer with CS to assist with preparation for defensive deposition of [redacted] (0.3).	1.20	875.00	1,050.00
9/26/24	JS	Attend videoconference with E. Brown and Stris team regarding safety expert report (0.2); prepare preliminary draft outline of same (2.1); attend teleconference with BA regarding response to Whinstone deficiency letter (0.1); revise draft response to same and finalize same for service (1.0); draft further high priority discovery correspondence (2.5); prepare opposition to Whinstone emergency motion for status conference (3.4); attend teleconfrence with CS regarding motion for summary judgment and trial strategy (0.3); evaluate potential summary judgment arguments regarding Whinstone defaults (2.0); prepare witness list for exchange with Whinstone (0.5).	12.10	875.00	10,587.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/26/24	CS	Participate in call with expert E. Brown regarding expert report (0.2); revise motion for partial summary judgment (0.7); draft proposed order granting motion for partial summary judgment (0.3); review Whinstone's emergency motion for hearing on discovery dispute (0.3); review and revise opposition to emergency motion for hearing on discovery dispute (0.3); continue reviewing and analyzing transcript of [redacted] prior testimony (1.4); meet with VO regarding [redacted] prior testimony (0.3); meet with JS to discuss motion for partial summary judgment (0.3); continue reviewing and analyzing documents relevant to [redacted] in anticipation of preparing him for his deposition (3.7).	7.50	725.00	5,437.50
9/26/24	PB	Update EB regarding expert discovery status (0.3); prepare eighth, ninth, tenth, and eleventh productions of documents (7.8); teleconference with B. Asay regarding same (0.3); teleconference with K. Pritchard and A. Galbraith regarding production issues (0.4); analyze and compile documents for analysis by potential expert T. Lewis (1.0).	9.80	725.00	7,105.00
9/26/24	SR	Review and revise interrogatory responses.	5.50	650.00	3,575.00
9/26/24	HM	Attend document review daily team call (0.1); review and respond to team correspondence regarding discovery to be produced by substantial completion date, September 26 (2.0); review and revise draft of motion for summary judgment (0.5); complete reviewing and analyzing documents to send to Charles Griffey for his ERCOT expert analysis (2.5); update [redacted] (0.4); organize and refine [redacted] (0.2); confer with PB about document production (0.5); review and analyze text messages of [redacted] (0.5); review and analyze documents related to the purchase of new miners for document production (1.4); review and revise Rhodium-Whinstone Witness Preparation slide deck and case themes (1.2); review response to Whinstone's emergency motion for hearing (0.3); review and analyze Whinstone's responses to Debtors' RFPs - Set One (0.8).	10.40	600.00	6,240.00
9/26/24	PNY	Review assigned document batches.	2.00	480.00	960.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/26/24	TT	Review and analyze transcript of Temporary Injunction Hearing Vol 2 to assist in preparation for depositions of [redacted]	2.20	480.00	1,056.00
9/26/24	VA	Review assigned privilege review batches.	8.00	480.00	3,840.00
9/26/24	HS	Review assigned privilege review batches.	3.40	480.00	1,632.00
9/26/24	FF	Review assigned privilege review batches (7.8).	7.80	480.00	3,744.00
9/26/24	MV	Continue review of draft privilege log and highlight document entries for further attorney review and [redacted].	3.00	400.00	1,200.00
9/26/24	CHH	Document review check-in with HM, PB, and discovery associates (0.1); finalize and run productions 8, 9, and 10 (5.0); upload various client documents to document database for production (0.2); finalize [redacted] native productions and overlays for production sets 1, 3, 4, and 5 (1.0); summarize [redacted] (Rhodium) document review for CS [redacted] (0.3).	6.60	325.00	2,145.00
9/26/24	JH	Attend meeting with expert Eric Brown to discuss case updates and details regarding Brown's expert report with PB, CS and JS (0.3); confer with CHH and ASA regarding continued document review of Rhodium [redacted] emails found in document productions (0.5).	.80	325.00	260.00
9/26/24	ASA	Record material sent to expert Charles Griffey [redacted] at request of HM (0.3); review prior [redacted] email review efforts in light of request by JS to [redacted] (0.9); review [redacted] documents for responsiveness to assist JS with deposition preparation (2.0).	3.20	325.00	1,040.00
9/27/24	EB	Review correspondence from BA regarding ERCOT expert issues (0.1); begin analyzing same (0.2).	.30	1100.00	330.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/27/24	BA	Prepare for and attend teleconference with SD, [redacted] and C. Griffey and review and confirm notes regarding same (0.7); analyze issues relevant to energy credit and expert opinion of C. Griffey and convey same to PB, HM, JS, and EB (0.7); review drafts of opposition to Whinstone's inspection request, research Rule 26 issue for same, and correspond with JS, CS, JH, and team regarding same (0.8); correspond with PB and HM regarding information and revisions needed to finalize interrogatory responses, continue reviewing and revising same, review and confirm documents cited in support of same, oversee process for generating responses for each interrogated entity, correspond and confer with [redacted] regarding finalization [redacted] of same, review and approve near-final and final versions of same (4.5); correspond with PB and team regarding additional hash rate documents for production, additional production from Whinstone, and steps for checking and confirming final productions before final discovery deadline (0.3);correspond with A. Swartz regarding attendance at Monday's hearing (0.1); correspond with W. Thompson and A. Swartz, and with Whinstone's counsel R. Slovak, regarding representation of Lyle Theriot (0.3); review Whinstone's motion to remand Imperium suit (0.2); review transcript of [redacted] and convey same with analysis to [redacted] and [redacted] (0.4); review proposed email to Foley exchanging witness information and correspond with JS, PB, and HM regarding timing of same (0.1).	8.10	1050.00	8,505.00
9/27/24	JS	Review and revise response to Whinstone emergency motion (2.1); calls with CS (0.2) and P. Tomasco (0.2) regarding same; prepare and serve email regarding witness list exchange (0.8).	3.30	875.00	2,887.50
9/27/24	CS	Review and revise opposition to Whinstone's emergency request for hearing on request to inspect premises (2.8); email communications with client regarding the same (0.4); review and analyze case law and other legal authority in support of the same (1.0); review cite check of the same (0.3); review and analyze documents relevant to [redacted] in anticipation of preparing him for his deposition (2.4).	6.90	725.00	5,002.50
9/27/24	PB	Prepare twelfth production of documents (3.8); draft privilege log regarding documents produced to date (1.9); revise draft interrogatory responses (0.7).	5.60	725.00	4,060.00

Stris & Maher LLP

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Date	Tkpr	Description	Hours	Rate	Amount
9/27/24	HM	Revise, finalize, and serve Air HPC's, Jordan HPC's, Rhodium 10MW's, Rhodium 30MW's, and Rhodium Encore's responses to Whinstone's first set of interrogatories (7.5); update [redacted] (0.2); organize and refine [redacted] materials (0.2).	7.90	600.00	4,740.00
9/27/24	PNY	Review assigned privilege review batch.	2.00	480.00	960.00
9/27/24	TT	Review and analyze transcript of Motion for Temporary Injunction Vol 1 Dec 2023 to assist in preparation for depositions of [redacted].	2.00	480.00	960.00
9/27/24	VA	Review assigned privilege review batches.	8.00	480.00	3,840.00
9/27/24	FF	Attend document review daily team meeting (0.2); review assigned document review batches (7.8).	8.00	480.00	3,840.00
9/27/24	MV	Review database workflow and evaluate potential issues regarding data and production formatting (1.5); continue review of draft privilege log and address highlighted entries for further review (2.0); update [redacted] regarding same (1.0).	4.50	400.00	1,800.00
9/27/24	JH	Continue document review of productions 5 through 8 to identify materials for deposition preparation and trial (3.0); confer with PB regarding potential further review project (0.3); confer with SD to assist in finalizing expert meeting notes (0.5); cite-check draft response to Whinstone's motion for a status conference for CS (1.5).	5.30	325.00	1,722.50
9/27/24	SD	No Charge - Attend teleconference with BA and expert Charles Griffey (0.3); attend teleconference with JAH for introduction to the matter (0.2); research and draft notes over meeting (1.3).	1.80	325.00	N/C
9/28/24	EB	Attention to case management (0.4); review and respond to email from JS regarding high priority action items including expert reports (0.1).	.50	1100.00	550.00
9/28/24	JS	Evaluate and plan for high-priority tasks for October (3.1); prepare for status conference regarding Whinstone request for inspection (0.5).	3.60	875.00	3,150.00
9/29/24	JS	Review briefing and interrogatory responses and prepare argument in connection with discovery hearing preparation.	2.50	875.00	2,187.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/29/24	PB	Draft summary analysis of data productions for hearing preparation.	2.30	725.00	1,667.50
9/29/24	HM	Review and respond to team correspondence regarding document discovery and Whinstone's requested inspection of the premises (0.3).	.30	600.00	180.00
9/29/24	TT	Review and analyze prior transcripts in preparation to assist in preparation for depositions of [redacted] (1.5); correspond with PB regarding review and analysis of transcripts (2.5).	4.00	480.00	1,920.00
9/30/24	PS	Attend team call with PB, VO, EB, JS, and CS regarding workflow and case strategy.	.90	1250.00	1,125.00
9/30/24	EB	Attend portion of strategic planning teleconference with PS, BA, VO, JS, CS, and PB (0.7); review correspondence from JS regarding results of hearing and upcoming inspection (0.1).	.80	1100.00	880.00
9/30/24	BA	Review and comment on draft summary judgment motion and correspond with CS regarding research related to same and potential Whinstone termination theories (1.3); participate in teleconference with JS, P. Tomasco, M. Robinson and D. Dunn regarding potential D. Dunn trial testimony (0.5); attend portion of teleconference with JS, PS, EB, VO, CS, and PB to discuss strategic planning for pretrial and trial action items (0.7); participate in teleconference with JS and bankruptcy counsel to discuss status conference on inspection request (0.4); review and propose revisions to correspondence to opposing counsel regarding same (0.1); attend status conference with court (0.5); attend portion of teleconference with PB, HM, and JS to discuss resulting action items (0.6); correspond with A. Davis and HM regarding subpoena follow up (0.1).	4.20	1050.00	4,410.00
9/30/24	VO	Attend portion of Stris team teleconference regarding strategy, assignments, and next steps (0.8).	.80	875.00	700.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/30/24	JS	Prepare for and attend meet and confer call with opposing counsel regarding depositions and inspection (1.8); prepare for discovery hearing regarding inspection and review document and Whinstone data requests in light of same (2.5); attend teleconference with D. Dunn, M. Robinson, P. Tomasco, BA, HM, and PB regarding potential trial testimony of D. Dunn (0.5); attend teleconference with P. Tomasco and BA regarding preparation for discovery hearing (0.4); attend discovery hearing (0.5); attend follow-up calls with [redacted] (0.1), P. Tomasco (0.2), and BA, HM, and PB (0.4) regarding next steps in light of outcome of hearing; prepare further correspondence regarding inspection and information requests from Whinstone (1.5); prepare for and attend Stris team planning call for high-priority October projects (0.9); review data produced in connection with [redacted] (0.8).	9.60	875.00	8,400.00
9/30/24	CS	Draft analysis of alleged breaches in April 22, 2024 notice of termination (5.1); participate in portion of team meeting regarding tasks necessary to prepare for trial (0.7); review and analyze material and begin outlining trial brief (2.4); review and analyze documents relevant to [redacted] deposition preparation (0.8).	9.00	725.00	6,525.00
9/30/24	PB	Prepare follow-up final productions of financial and custodial data (6.3); attend teleconference with Province team and co-counsel (0.5); attend teleconference with PS, VO, EB, JS, and CS regarding workflow and case strategy (0.9); attend court conference regarding inspection (0.6); attend portion of follow-up team call regarding same (0.4).	8.70	725.00	6,307.50
9/30/24	HM	Review and analyze communications and advise AA regarding updates to contact list and case management materials (5.0); attend teleconference with M. Robinson and D. Dunn (Province), BA, JS, PB, and P. Tomasco (Quinn Emanuel) (0.5); attend meet-and-confer teleconference with JS, BA, AA, and opposing counsel (0.6); review and respond to team correspondence regarding discovery matters and status conference (2.5); advise CH regarding updates to production log and document collection memorandum (1.0); attend team teleconference to discuss inspection of Rockdale facility (0.5).	10.10	600.00	6,060.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/30/24	TT	Review and analyze additional prior testimony to assist in preparation for depositions of [redacted] (2.6); correspond with PB regarding analysis of same (0.2).	2.80	480.00	1,344.00
9/30/24	MV	Continue reviewing and updating draft privilege log and and related materials including to address entries designated for further review.	2.50	400.00	1,000.00
9/30/24	JH	Continue reviewing [redacted] emails from productions 5 through 8 in support of deposition and trial preparation.	2.00	325.00	650.00
9/30/24	ASA	Attend and assist JS and HM with notes from meet and confer with opposing counsel (0.6); circulate notes from meeting to Stris team (0.4); review video referenced by opposing counsel (0.1); update running matter memorandum to include document collection efforts, newly filed material, and case updates sent by HM (2.7); organize and file bankruptcy documents and subpoenas (0.5).	4.30	325.00	1,397.50
		TOTAL PROFESSIONAL SERVICES			**$ 1,102,504.50**

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SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	20.40	1,250.00	25,500.00
Elizabeth Brannen	EB	Partner	23.80	1,100.00	26,180.00
Bridget Asay	BA	Partner	110.80	1,050.00	116,340.00
Victor O'Connell	VO	Partner	16.30	875.00	14,262.50
John Stokes	JS	Partner	218.60	875.00	191,275.00
Colleen Smith	CS	Associate	104.90	725.00	76,052.50
Peter Brody	PB	Associate	161.80	725.00	117,305.00
Sarah Rahimi	SR	Associate	104.30	650.00	67,795.00
Helen Marsh	HM	Associate	157.40	600.00	94,440.00
Tanya Tice	TT	Discovery Associate	29.40	480.00	14,112.00
Michele Jarrouj	MJ	Discovery Associate	20.10	480.00	9,648.00
Pascale Nyby	PNY	Discovery Associate	124.00	480.00	59,520.00
Venu Alagh	VA	Discovery Associate	156.50	480.00	75,120.00
Holly Sadlon	HS	Discovery Associate	126.10	480.00	60,528.00
Fatima Fofana	FF	Discovery Associate	177.80	480.00	85,344.00
Monica Viramontes	MV	Sr Paralegal	41.00	400.00	16,400.00
Andrew Atsalis	ASA	Fellow	25.40	325.00	8,255.00
Cynthia Huang	CHH	Fellow	87.90	325.00	28,567.50
Jaida Hodge-Adams	JH	Fellow	48.80	325.00	15,860.00
Total			**1,755.30**		**$ 1,102,504.50**

EXPENSES ADVANCED

Date	Task	Description	Amount
8/23/24		StoneTurn - September 2024 services.	12,637.50
9/01/24		Logikcull Discovery Solutions (September 2024).	2,646.00
9/30/24		Peregrine Consultants, LLC - Professional services for September 2024.	21,450.00
		TOTAL EXPENSES ADVANCED	**$ 36,733.50**

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TOTAL THIS INVOICE **$ 1,139,238.00**

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 SECOND MONTHLY FEE STATEMENT
FOR THE PERIOD OCTOBER 1, 2024, THROUGH OCTOBER 31, 2024

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 October 1, 2024 through October 31, 2024 (the "Second Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $1,255,671.00 (80% of the services rendered), plus $120,666.25 (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.

[1] 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 Second 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 (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 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;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (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 (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 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 (ha.nguyen@usdoj.gov), 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 21th day of November, 2024.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
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-and-

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-and-

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Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on November 21, 2024, 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

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	0.90	$990.00	$792.00
002	Temple Green Data Matter	6.70	$5,682.50	$4,546.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	2,054.40	$1,515,785.00	$1,212,628.00
007	Retention and Fee Applications	21.50	$12,985.00	$10,388.00
008	Non-working Travel for Whinstone Dispute	81.90	$34,146.25	$27,317.00
Total		2165.40	$1,569,588.75	$1,255,671.00

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,100.00	0.90	$990.00

Temple Green Data Matter

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Victor O'Connell	Partner	2012	$875.00	5.50	$4,812.50
Colleen Smith	Associate	2015	$725.00	1.20	$870.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Peter K. Stris	Founding Partner	2001	$1,250.00	19.90	$24,875.00
Elizabeth Brannen	Managing Partner	2001	$1,100.00	179.40	$197,340.00
Bridget Asay	Partner	1997	$1,050.00	219.00	$229,950.00
Victor O'Connell	Partner	2012	$875.00	95.40	$83,475.00
John Stokes	Partner	2016	$875.00	355.20	$310,800.00
Colleen Smith	Associate	2015	$725.00	177.30	$128,542.50
Peter Brody	Associate	2016	$725.00	267.30	$193,792.50
Sarah Rahimi	Associate	2019	$650.00	68.60	$44,590.00
Helen Marsh	Associate	2024	$600.00	240.70	$144,420.00
Tanya Tice	Discovery Associate	1989	$480.00	43.50	$20,880.00
Monica Viramontes	Senior Paralegal	N/A	$400.00	146.50	$58,600.00
Andrew Atsalis	Litigation Fellow	N/A	$325.00	62.20	$20,215.00
Cynthia Huang	Litigation Fellow	N/A	$325.00	57.00	$18,525.00
Shayra Banta	Litigation Fellow	N/A	$325.00	37.70	$12,252.50
Jaida Hodge-Adams	Litigation Fellow	N/A	$325.00	84.70	$27,527.50

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Peter K. Stris	Founding Partner	2001	$1,250.00	0.40	$500.00
Elizabeth Brannen	Managing Partner	2001	$1,100.00	5.70	$6,270.00
Victor O'Connell	Partner	2012	$875.00	2.20	$1,925.00
Cynthia Huang	Litigation Fellow	N/A	$325.00	10.10	$3,282.50
Nicholas Capalbo	Litigation Fellow	N/A	325.00	3.10	$1,007.50

Non-Working Travel for Whinstone Dispute[2]

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,100.00	6.20	$6,820.00
Bridget Asay	Partner	1997	$1,050.00	11.00	$11,550.00
Victor O'Connell	Partner	2012	$875.00	20.30	$17,762.50
John Stokes	Partner	2016	$875.00	7.00	$6,125.00
Peter Brody	Associate	2016	$725.00	23.00	$16,675.00
Sarah Rahimi	Associate	2019	$650.00	14.40	$9,360.00
Total after 50% discount					$34,146.25

[2] Stris & Maher has billed its time for travel in connection with the Whinstone dispute during which no work was performed on a separate invoice at a 50% discount.

EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
JND eDiscovery hosting	$3,765.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
Logikcull Discovery Solutions (October 2024)	$2,646.00
SETEC Investigations	$3,599.00
Fulcrum Legal Graphics	$15,000.00
StoneTurn (September 2024)	$47,600.00
E. Brown expert fees	$48,056.25
Total	$116,901.25

EXHIBIT 4

Stris

November 8, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14283
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through October 31, 2024

RE: Midas Green Litigation

Total Professional Services	$ 990.00
Total Expenses Advanced	$ 3,765.00
TOTAL THIS INVOICE	**$ 4,755.00**
Previous Balance	$ 9,045.00
TOTAL BALANCE DUE	**$ 13,800.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14283 November 8, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
10/07/24	EB	Correspond with PB and G. Cutri regarding [redacted].	.10	1100.00	110.00
10/08/24	EB	Review and respond to further correspondence from former patent litigation counsel G. Cutri.	.10	1100.00	110.00
10/15/24	EB	Review and respond to correspondence from G. Cutri regarding status inquiry concerning [redacted].	.10	1100.00	110.00
10/16/24	EB	Confer with B. Rice regarding inquiry to G. Cutri regarding [redacted].	.10	1100.00	110.00
10/22/24	EB	Confer with G. Cutri (Kirkland) regarding [redacted].	.50	1100.00	550.00
		TOTAL PROFESSIONAL SERVICES			**$ 990.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	.90	1,100.00	990.00
Total			**.90**		**$ 990.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
10/01/24		JND eDiscovery - October invoice.	3,765.00
		TOTAL EXPENSES ADVANCED	**$ 3,765.00**
		TOTAL THIS INVOICE	**$ 4,755.00**

Invoice # 14283 November 8, 2024

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14251	11/01/24	855.00	.00	855.00
14257	11/04/24	8,190.00	.00	8,190.00

Previous Balance	$ 9,045.00
Balance Due This Invoice	$ 4,755.00
TOTAL BALANCE DUE	**$ 13,800.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 9,045.00	$ .00	$ .00	$ .00	$ .00	$ 9,045.00

Stris

November 8, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14268
Client # 00346
Matter # 002

INVOICE SUMMARY

For professional services rendered through October 31, 2024

RE: Temple Green Data Litigation

Total Professional Services	$ 5,682.50
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 5,682.50**
Previous Balance	$ 22,490.00
TOTAL BALANCE DUE	**$ 28,172.50**

Electronic Invoice

Invoice # 14268 November 8, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
10/04/24	CS	Review lease and identify provisions in support of correspondence with landlord.	.20	725.00	145.00
10/09/24	VO	Confer with CS regarding portion of letter to landlord regarding [redacted] (0.1); confer with [redacted] and [redacted] regarding strategy and action items relating to new request for information [redacted] (0.8); review draft insert prepared by CS (0.1); draft talking points for [redacted] in teleconference with TGD (0.3)	1.30	875.00	1,137.50
10/09/24	CS	Continue reviewing and analyzing relevant lease provisions and drafting portion of [redacted] regarding Temple Site.	1.00	725.00	725.00
10/11/24	VO	Review update from [redacted] regarding teleconference with TGD (0.1); attend videoconference with [redacted] and [redacted] regarding strategy and next steps in addressing same (0.7); prepare draft correspondence to M. Simmons (0.5).	1.30	875.00	1,137.50
10/14/24	VO	Correspond with client and P. Tomasco regarding strategy and response to further correspondence from TGD.	.50	875.00	437.50
10/15/24	VO	Review and revise P. Tomasco letter [redacted] (0.8); emails with [redacted] and [redacted] regarding response to TGD regarding [redacted] (0.7).	1.50	875.00	1,312.50
10/23/24	VO	Confer with [redacted] and [redacted] regarding issues relating to [redacted].	.40	875.00	350.00
10/31/24	VO	Review and revise letter [redacted] (0.4); emails with P. Tomasco regarding same (0.1).	.50	875.00	437.50
		TOTAL PROFESSIONAL SERVICES			**$ 5,682.50**

Invoice # 14268 November 8, 2024

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Victor O'Connell	VO	Partner	5.50	875.00	4,812.50
Colleen Smith	CS	Associate	1.20	725.00	870.00
Total			**6.70**		**$ 5,682.50**

TOTAL THIS INVOICE **$ 5,682.50**

Stris & Maher LLP

Invoice # 14268 November 8, 2024

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14247	11/01/24	7,190.00	.00	7,190.00
14259	11/04/24	15,300.00	.00	15,300.00

Previous Balance	$ 22,490.00
Balance Due This Invoice	$ 5,682.50
TOTAL BALANCE DUE	**$ 28,172.50**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 22,490.00	$ .00	$ .00	$ .00	$ .00	$ 22,490.00

Stris

November 14, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14269
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through October 31, 2024

RE: Whinstone Litigation

Total Professional Services	$ 1,515,785.00
Total Expenses Advanced	$ 116,901.25
TOTAL THIS INVOICE	**$ 1,632,686.25**
Previous Balance	$ 1,219,106.00
TOTAL BALANCE DUE	**$ 2,851,792.25**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Invoice # 14269 November 14, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
10/01/24	PS	Review and respond to team correspondence regarding site inspections and trial graphics (0.5); review and convey feedback regarding draft of motion to remand reply (0.8); review and evaluate summary judgment issues and strategy (0.9).	2.20	1250.00	2,750.00
10/01/24	EB	Correspond with Fulcrum, PS, VO, and JS regarding trial graphics support (0.4); review and analyze ERCOT expert materials and strategic questions in support of expert report (0.5); attend portion of teleconference with BA, JS, and PB regarding same (1.1); attend teleconference with MV regarding exhibit list (0.2); advise TT regarding memorandum to support Rhodium witness deposition preparation (0.1); correspond with JS and SR regarding [redacted] for same (0.1); attention to case management (0.5); attend teleconference with SR regarding high priority action items including materials for deposition preparation sessions (0.3); correspond with BA and JS regarding deposition scheduling (0.1); prepare for upcoming deposition preparation sessions (0.8).	4.10	1100.00	4,510.00

Stris & Maher LLP

Invoice # 14269 November 14, 2024

Date	Tkpr	Description	Hours	Rate	Amount
10/01/24	BA	Advise PB regarding privilege log (0.4); prepare [redacted] and confer with EB and JS regarding ERCOT expert report [redacted] (1.5); prepare for client update call regarding trial preparation and correspond with JS regarding same (0.3); participate in same (1.2); correspond with litigation team regarding and review production of documents from C. Harris (1.0); review and correspond with A. Swartz regarding revisions to expert report [redacted] (0.4); correspond with JS, PB, and team regarding regarding inspection and data requests (0.3); correspond with litigation team regarding deposition scheduling and witness availability (0.2); review power-related documents from Whinstone provided to C. Griffey and correspond with HM regarding redactions to and correspondence with opposing counsel regarding same (0.4); review and correspond with JS, PB, and HM regarding response to correspondence from Whinstone's counsel regarding potential summary judgment motion and sealing (0.5); review draft opposition to motion to remand and correspond with JS regarding same (0.4).	6.60	1050.00	6,930.00
10/01/24	JS	Attend teleconferences with A. Swartz (0.1) and M. Frederick regarding upcoming depositions and inspection (0.2); confer with BA, EB, and PB regarding expert report status and next steps (1.2); attend portion of client teleconference (1.0); attend teleconference with PB regarding [redacted] emails (0.2); attend teleconferences with CS regarding summary judgment motion status and next steps (0.2); review and evaluate summary judgment issues and strategy (2.1); prepare correspondence with opposing counsel regarding discovery issues and summary judgment conferral (3.5); evaluate deposition [redacted] and next steps for [redacted] depositions (1.6); continue developing trial [redacted] (2.5).	12.60	875.00	11,025.00
10/01/24	SR	Prepare deposition preparation materials for defensive depositions (1.0); review and summarize termination notices for CS in support of summary judgment briefing (2.2); attend teleconference with EB to discuss trial preparation and deposition support tasks (0.3); begin conducting legal research in support summary judgment briefing for CS (2.0).	5.60	650.00	3,640.00

Stris & Maher LLP

Invoice # 14269 November 14, 2024

Date	Tkpr	Description	Hours	Rate	Amount
10/01/24	CS	Continue reviewing and analyzing documents relevant to [redacted] in anticipation of preparing him for his deposition (1.9); review and analyze documents regarding Whinstone's calculation of profit share (1.0); attend teleconference with JS to discuss motion for partial summary judgment (0.2); continue drafting trial brief outline (2.2); continue drafting motion for partial summary judgment (2.9).	8.20	725.00	5,945.00
10/01/24	JH	Tag documents for upcoming production at PB request.	2.00	325.00	650.00
10/01/24	PB	Analyze materials for use in [redacted] expert report (0.8); prepare privilege log and qc redacted documents for production (4.6); attend teleconference with JS regarding email review (0.2); attend teleconference with MV and HM regarding privilege log (0.3); assist JS with expert materials (0.1); qc and prepare final document production (2.7); analyze supporting materials for [redacted] expert report (0.8).	9.80	725.00	7,105.00
10/01/24	ASA	Download and organize documents from past productions in native and PDF form for use by Rhodium's expert witnesses at request of PB (2.7); create and update expert tracking materials for HM and team (1.3).	4.00	325.00	1,300.00
10/01/24	HM	Review and respond to team correspondence regarding document discovery and privilege log (2.5); attend teleconference with PB, and MV regarding privilege log (0.3); qc organization and completeness of internal case files (1.4); advise ASA regarding updates to same and case management materials (0.8); revise notes from September 30, 2024 meeting with [redacted] and [redacted] (0.6); review and analyze documents [redacted] for [redacted] deposition preparation (1.5); review and revise expert materials lists (0.5).	7.60	600.00	4,560.00
10/01/24	TT	Draft memorandum to EB and PB in support of offensive and defensive depositions and deposition preparation.	4.80	480.00	2,304.00
10/01/24	MV	Review documents and [redacted] to prepare for (2.0) and attend (0.3) teleconference with PB and HM regarding privilege log and [redacted]; begin implementing revisions to same (1.0); attend teleconference with EB regarding exhibit list (0.2).	3.50	400.00	1,400.00

Stris & Maher LLP

Invoice # 14269 November 14, 2024

Date	Tkpr	Description	Hours	Rate	Amount
10/02/24	VO	Confer with JS, BA, and PB regarding deposition preparation.	1.00	875.00	875.00
10/02/24	PS	Review emails regarding discovery and deposition scheduling and confer regarding same.	.30	1250.00	375.00
10/02/24	EB	Prepare for teleconference with [redacted] expert (1.5); attend teleconference with BA regarding same and trial preparation and strategy (0.8); attend portion of teleconference with PB, SR, HM, MV, JHA, and AAS regarding exhibit list and deposition support (1.0); attend portion of teleconference with BA, JS, HM, and [redacted] expert regarding [redacted] and information in support of report (0.4); draft portions of [redacted] (1.0); review and propose revisions to Rule 30(b)(6) deposition notice (0.2); analyze initial questions from TT in support of deposition preparation (0.1); attend teleconference with TT regarding follow-up questions regarding same and revisions to [redacted] (0.2); correspond with TT regarding same and related analysis (0.1); attend teleconference with PB regarding action items including production of additional expert documents and deposition preparation (0.5); attend teleconference with HM regarding trial preparation (0.1).	5.90	1100.00	6,490.00

Stris & Maher LLP

Invoice # 14269 November 14, 2024

Date	Tkpr	Description	Hours	Rate	Amount
10/02/24	BA	Attend teleconference with EB to prepare for meeting with [redacted] expert [redacted] (0.8); correspond with PB regarding document production issues (0.1); correspond with HM regarding provision of third party productions to opposing counsel (0.1); draft proposed email for opposing counsel regarding late disclosure of A. Harris and documents from same, and convey draft to JS (0.2); correspond with HM, AS, JS and team regarding deficiencies in Whinstone's production related to power and power credit data, draft proposed email to opposing regarding same, and convey same to JS (0.5); confer with [redacted], EB, JS, and HM regarding [redacted] for report, data needs, and [redacted] (0.5); continue outlining [redacted] for expert report (0.5); attend teleconference with JS regarding high priority action items and task assignments (0.4); confer with PB, VO, and JS regarding deposition preparation (1.1); confer with JS, [redacted] and [redacted] regarding trial preparation (0.5); continue reviewing draft opposition to motion to remand and convey comments to P. Tomasco (0.4); correspond with HM and PB regarding protective orders to be signed by [redacted] (0.1); review draft 30(b)(6) notice and correspond with JS regarding same, and review comments from EB on same (0.4); correspond with team regarding Whinstone's productions and Rhodium's productions, and monitor correspondence regarding Whinstone's inspection and data requests (0.3).	5.80	1050.00	6,090.00
10/02/24	JS	Attend teleconference with BA, VO, and PB regarding deposition strategy (1.1); call with J. Cohn regarding trial and summary judgment strategy (0.7); call with [redacted] regarding Whinstone inspection (0.4) and with M. Frederick regarding same (0.2); call with A. Swartz regarding production question (0.1); call with [redacted] regarding [redacted] report status and next steps (0.1); call with BA regarding high priority action items on discovery, motion practice, and trial planning (0.4); call with CS regarding MSJ arguments and next steps on same (0.3); work on deposition defense [redacted] for [redacted] (2.5); review and evaluate MSJ arguments and briefing on same (2.2); prepare correspondence with Foley regarding data-production and related high priority discovery issues (3.1); confer with PB regarding [redacted] issues and evaluate same (1.4).	12.50	875.00	10,937.50

Invoice # 14269 November 14, 2024

Date	Tkpr	Description	Hours	Rate	Amount
10/02/24	SR	Attend teleconference with EB, PB, HM, VM, JHA, and AAS regarding exhibit list and deposition documentary support (1.3); conduct legal research regarding contract termination to support summary judgment briefing (3.9); prepare for [redacted] deposition preparation sessions (2.4).	7.50	650.00	4,875.00
10/02/24	CS	Continue reviewing documents relevant to [redacted] and continue drafting [redacted] in anticipation of preparing him for his deposition (2.1); meet with JS to discuss [redacted] deposition (0.3); correspond with SR regarding materials for [redacted] deposition (0.2); continue drafting motion for partial summary judgment (4.3); review and analyze case law regarding [redacted] (1.1).	8.00	725.00	5,800.00
10/02/24	JH	Assist MV with information in support of privilege log (1.1); attend teleconference with EB, PB, SR, HM, MV, and AAS regarding exhibit list and deposition documentary support (1.3); prepare notes for same (0.3); continue reviewing [redacted] communications in preparation for upcoming depositions, at JS request (1.0).	3.70	325.00	1,202.50
10/02/24	PB	Analyze [redacted] materials to be used in preparation of expert report and preparation for deposition defense of [redacted] (2.5); confer with JS regarding [redacted] issues and analysis of same (1.4); prepare final production of documents to Whinstone (3.2); attend teleconference with JHA, EB, MV, HM, and AAS regarding exhibit list preparation and trial preparation strategy (1.3); attend teleconference with EB regarding deposition defense and expert reports (0.5); attend teleconference with HM and A. Swartz regarding expert discovery (0.5); confer with BA, JS, and VO regarding deposition preparation and case strategy (1.0); attend teleconference with [redacted], and [redacted] regarding [redacted] and follow-up discovery items (1.0).	11.40	725.00	8,265.00
10/02/24	ASA	Attend teleconference with EB, PB, SR, HM, VM, and JHA regarding exhibit list and deposition documentary support (1.3); prepare template of Rhodium trial and deposition exhibit tracking spreadsheet for use by MV (0.9).	2.20	325.00	715.00

Stris & Maher LLP

Invoice # 14269 November 14, 2024

Date	Tkpr	Description	Hours	Rate	Amount
10/02/24	HM	Attend part of teleconference with EB, PB, SR, MV, JHA, and AA regarding exhibit list and deposition documentary support (1.2); analyze and review and respond to team correspondence regarding conferral with Whinstone's counsel, documents shared with experts, and redacted documents produced by Whinstone (3.0); confer with EB regarding trial preparation (0.1); attend portion of teleconference with BA, EB, JS, and C. Griffey to discuss outstanding materials needed (0.1); review and analyze opposing and third party document productions to identify materials for ERCOT expert C. Griffey and provide same (3.8); attend teleconference with PB and A. Swartz to discuss outstanding discovery items and review tasks (0.5); review and revise task list (0.3); review and revise Rule 30(b)(6) deposition notice (1.0); draft email to Whinstone's counsel regarding C. Harris document production (0.8); attention to documents requested by P. Tomasco (0.4).	11.20	600.00	6,720.00
10/02/24	TT	Attend teleconference with EB regarding action items in support of depositions of Rhodium and Whinstone and [redacted] expert report (0.2); revise background [redacted] (2.6).	2.80	480.00	1,344.00
10/02/24	MV	Review [redacted] for privilege log and incorporate additional [redacted], per attorney instruction (0.5); attend teleconference with EB, PB, SR, HM, JHA, and AAS regarding exhibit list and deposition documentary support (1.3); continue revising and editing privilege log (2.2).	4.00	400.00	1,600.00
10/03/24	VO	Confer with [redacted] to get update on [redacted] (0.2); correspondence with JS, W. Thompson, and J. Cohn regarding same (0.1); confer with JS regarding strategy in light of [redacted] update regarding [redacted] (0.9); confer with JS, BA, J. Cohn, and W. Thompson regarding strategy in light of same (0.3); confer with JS and [redacted] regarding same (0.5); confer with P. Tomasco, [redacted] and JS regarding same (0.6).	2.60	875.00	2,275.00
10/03/24	PS	Review and attend to emails regarding discovery.	.40	1250.00	500.00

Stris & Maher LLP

Invoice # 14269 November 14, 2024

Date	Tkpr	Description	Hours	Rate	Amount
10/03/24	EB	Continue drafting portions of [redacted] (3.6); correspond with BA, JS, PB, HM, A. Swartz, and [redacted] regarding review and production of additional documents in support of same (0.2); review and comment on draft [redacted] expert report (0.9); attend teleconference with PB regarding revisions and additional information in support of same (0.5); correspond with TT regarding review of [redacted] testimony and evidence in support of same (0.1); correspond with PS, VO, and JS regarding (0.1) and correspond (0.1) and attend teleconference (0.5) with Fulcrum regarding trial graphics; correspond with BA, JS, PB, W. Thompson and A. Swartz regarding coordination of documents for use in depositions and deposition preparation (0.2); correspond with BA and HM regarding trial preparation (0.2); attend teleconference with TT regarding action items in support of portions of same and [redacted] (0.2); correspond with C. Hickey regarding proposed revisions to engagement letter for graphics support (0.2); review and respond to correspondence from BA and HM regarding additional production of documents from Whinstone and Priority Power, deficiency correspondence, and provision to ERCOT expert (0.2).	6.90	1100.00	7,590.00

Stris & Maher LLP

Invoice # 14269 November 14, 2024

Date	Tkpr	Description	Hours	Rate	Amount
10/03/24	BA	Attend teleconference with PB, HM, and clients regarding outstanding discovery production questions (0.3); confer with CS and JS regarding summary judgment motion and trial brief (1.2); review and revise draft motion for summary judgment (01.3); confer with JS, [redacted] and P. Tomasco regarding expert testimony and opinions from [redacted] and related deposition preparation (1.1); confer with JS, VO, J. Cohn and W. Thompson regarding potential witness (0.3) and prepare and convey analysis of issues regarding same (0.2); correspond with HM, EB, and PB regarding documents for review by C. Griffey and production of same (0.4); correspond with PB and JS regarding advising Whinstone of potentially privileged document (0.1); review nonprivilege redactions on Whinstone documents reviewed by [redacted] and correspond regarding same (0.1); correspond with HM, J. Cohn and team regarding follow up on Ledoux subpoena (0.2); review Priority Power production, correspond with HM and EB regarding conveying same to C. Griffey and follow up with Priority Power, and review and edit draft letter seeking additional data (0.5); review Whinstone's motion for summary judgment, correspond with PB regarding same, and correspond with bankruptcy counsel regarding procedural requirements for summary judgment practice (0.9); review Whinstone's discovery responses and began analyzing deficiencies in same (0.9); review analysis from HM of missing documents in Whinstone's production and correspond with HM regarding next steps (0.2).	7.70	1050.00	8,085.00

Invoice # 14269 November 14, 2024

Date	Tkpr	Description	Hours	Rate	Amount
10/03/24	JS	Confer with BA and CS regarding MSJ and trial brief (1.2); review and evaluate draft motion for summary judgment (1.0); confer with BA, [redacted], and P. Tomasco regarding expert testimony from [redacted] (1.1); confer with BA, VO, J. Cohn, and W. Thompson regarding [redacted] witness (0.3); calls with [redacted] and VO (0.5), [redacted], VO, and P. Tomasco (0.6), P. Tomasco (0.2), and VO (0.8) regarding same; evaluate adjustments to trial presentation with VO in light of same (0.9); review and evaluate correspondence from Foley regarding discovery matters (0.5); review and evaluate Foley responses to RFAs and interrogatories (1.0); review and evaluate Whinstone motion for summary judgment (1.5); correspond with PB regarding same (0.4); attend teleconference with PB regarding [redacted] issues (0.5).	10.50	875.00	9,187.50
10/03/24	SR	Continue drafting [redacted] deposition preparation [redacted]	6.90	650.00	4,485.00
10/03/24	CS	Confer with JS and BA to discuss summary judgment motion and trial brief (1.2); continue drafting partial summary judgment motion (3.6); continue drafting outline for trial brief (2.5).	7.30	725.00	5,292.50
10/03/24	JH	Continue reviewing and flagging [redacted] communications for use in preparation for upcoming depositions (3.5); assist HM and ASA to prepare new files for expert C. Griffey (1.0).	4.50	325.00	1,462.50
10/03/24	PB	Draft preparation [redacted] for upcoming deposition defense of [redacted] (1.1); prepare, finalize, and serve Debtors' thirteenth production of documents (3.7); attend teleconference with JS regarding [redacted] issues (0.5); attend teleconference with [redacted], BA, and HM regarding potential [redacted] issues (0.3); attend teleconference with EB regarding [redacted] expert report (0.5); analyze financial documentation to support damages expert report (4.3).	10.20	725.00	7,395.00
10/03/24	ASA	Assist with provision of documents to Rhodium expert C. Griffey (0.4); update case management material to to ensure attorney organization (1.5).	1.90	325.00	617.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/03/24	HM	Attend teleconference with BA and PB, and MS, CT, PR, and [redacted] to discuss outstanding discovery production questions related to [redacted] (0.3); review and analyze TXU invoices, Priority Power Management Documents, and Rhodium Energy Usage report for temporal gaps and redactions (3.0); create and circulate a chart for temporal gaps and redactions of documents produced by Whinstone (1.5); draft letter to counsel for Priority Power Management (0.2); review, analyze, and organize supplemental materials from Whinstone productions and send to Charles Griffey (2.3); review and respond to team correspondence relating to Whinstone's productions and subpoena responses from Priority Power Management and James Ledoux (2.7).	10.00	600.00	6,000.00
10/03/24	TT	Confer with EB regarding questions to assist with preparation [redacted] report (0.2); review, analyze, and draft memorandum to EB regarding analysis of pleadings, hearing transcripts, contracts, and documents to assist in preparation of same (2.7); draft [redacted] to assist in deposition preparation for experts and Rhodium and opposing witnesses (3.0).	5.90	480.00	2,832.00
10/03/24	TT	Review and analyze December 2023 and March 2024 Temporary Injunction Hearings regarding [redacted] issues to assist in preparation for depositions and trial (2.0).	2.00	480.00	960.00
10/03/24	MV	Review and format data on draft privilege log (3.0); review, update, and cross-check documents for inclusion on same (4.0).	7.00	400.00	2,800.00
10/04/24	PS	Review emails and confer with team on various items of litigation strategy including Foley's emergency motion.	1.30	1250.00	1,625.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/04/24	EB	Correspond with A. Schwartz, BA, VO, JS, PB, SR, and HM regarding [redacted] and deposition preparation materials (0.1); review and analyze additional materials in support of and continue drafting portions of [redacted] (2.1); review, respond, and incorporate additional feedback and questions from TT into draft of same (0.1); review and respond to initial update from TT regarding [redacted] evidence with follow-up questions (0.1); correspond with BA, JS, PB, and HM regarding same and potential additions and revisions to [redacted] expert report (0.5); review and respond to team correspondence regarding additional discovery-related issues and action items (0.2).	3.10	1100.00	3,410.00
10/04/24	BA	Confer with JS, J. Cohn, and W. Thompson regarding strategy and outline summary judgment motion and opposition (1.4); outline research tasks for same, convey to JS for review, and convey to W. Thompson and J. Cohn for staffing of same (0.4); review summary judgment notes and outline for J. Cohn, update with notes of teleconference, and convey same to CS and JS for review (0.3); correspond with bankruptcy counsel regarding timing and procedural requirements for summary judgment filings (0.1); continue reviewing and analyzing Whinstone's discovery responses and convey analysis of deficiencies in same to JS, HM, PB, and A. Swartz, with proposal for deficiency letter (1); correspond and confer with SD to make binders for use in summary judgment and trial brief preparation (0.1); correspond with EB regarding potential opinion from [redacted] rebutting power overage claims and review response from [redacted] regarding same (0.3); review proposed email from JS to M. Thomas regarding expert information and respond to same (0.1); draft, review, and revise deficiency letters to Whinstone and Riot regarding document productions, missing documents, and deficient responses to written discovery, correspond with JS, HM, and PB regarding same, and confer with JS regarding same (3.2); review correspondence and filings related to Whinstone's emergency motion to alter scheduling order (0.2).	7.00	1050.00	7,350.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/04/24	JS	Call with BA, J. Cohn, and W. Thompson regarding MSJ strategy (1.4); call with W. Thompson regarding deficiency letter on Whinstone RFA Responses (0.2); call with J. Cohn regarding MSJ schedule and Whinstone emergency motion (0.1); prepare deficiency letters regarding Whinstone discovery responses (5.5); prepare correspondence to Foley regarding emergency motion and MSJ schedule (0.3); conduct legal research regarding issues in Foley MSJ on breach questions (0.5); review high-relevance documents in connection with opposition to Foley MSJ (0.9); correspond with SMLLP, LKC, and client teams regarding emergency motion and MSJ schedule (0.2); prepare correspondence to Foley regarding deposition scheduling (0.5).	9.60	875.00	8,400.00
10/04/24	CS	Review and analyze edits to motion for partial summary judgment from [redacted] (0.5); continue drafting and revising motion for partial summary judgment (7.7).	8.20	725.00	5,945.00
10/04/24	JH	Continue reviewing Rhodium [redacted] to be issue-tagged and flagged as [redacted] with ASA in preparation for upcoming depositions.	4.00	325.00	1,300.00
10/04/24	PB	Assist in preparation and drafting of expert report of [redacted] (2.3); prepare for defense of deposition of [redacted] (3.0); analyze financial materials for use in expert report of [redacted] (0.6); teleconference with [redacted] regarding financial data (0.6).	6.50	725.00	4,712.50
10/04/24	ASA	Update case status [redacted] to reflect recent developments (0.6); assist attorneys with deposition scheduling and preparation including responding to rolling requests from JS and VO for documents (2.9).	3.50	325.00	1,137.50
10/04/24	HM	Continue reviewing and analyzing TXU invoices, Priority Power Management Documents, and Rhodium Energy Usage report and other key documents produced by Whinstone for temporal gaps and redactions (4.0); draft Rhodium's Third Deficiency Letter regarding deficiencies in Whinstone's productions (3.8); review and respond to team correspondence regarding Rhodium's Third Deficiency Letter and Whinstone's responses to Rhodium's second set of requests for production, first set of requests for admission, and first set of interrogatories (1.5).	9.30	600.00	5,580.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/04/24	TT	Review and analyze December 2023 and March 2024 Temporary Injunction Hearings regarding [redacted] issues to assist in preparation for depositions and trial (9.0).	9.00	480.00	4,320.00
10/04/24	MV	Continue revising privilege log (3.0); [redacted] on log for further attorney review (1.0); review draft exhibit list and revise template for same (0.5).	4.50	400.00	1,800.00
10/05/24	BA	Review and revise discovery correspondence to Whinstone's counsel, review discovery letter from Whinstone's counsel, correspond with JS, PB, and HM regarding same, and finalize and send fourth deficiency letter to Whinstone's counsel (1.2); confer with JS regarding creditor correspondence (0.1).	1.30	1050.00	1,365.00
10/05/24	JS	Work on trial strategy outlining (1.5); review Whinstone deficiency letter and confer with BA, HM, PB regarding same (0.5); review and revise deficiency letters regarding Whinstone discovery responses in preparation for finalization of same (0.5).	2.50	875.00	2,187.50
10/05/24	PB	Analyze correspondence from Whinstone regarding purported discovery deficiencies and draft response to same.	2.30	725.00	1,667.50
10/05/24	HM	Revise, finalize, and send Rhodium's Third Deficiency Letter to Whinstone and Riot (1.5); collect, send, and log documents for ERCOT expert Charles Griffey's review (0.5); review and revise letter from JS to Whinstone's counsel regarding Whinstone's responses to Rhodium's requests for admission, interrogatories, and requests for documents (0.5); begin reviewing past transcripts of temporary injunction hearings for [redacted] to proffer at trial (1.5).	4.00	600.00	2,400.00
10/06/24	BA	Review and revise draft 30(b)(6) notice and convey same to EB, JS, PB, and HM for review (1.8); research new witness disclosed by Whinstone, correspond with JS and team regarding implications of same, and correspond with EB regarding issues related to [redacted] report (0.4); research and draft portions of response to Whinstone's Oct 5 discovery letter and correspond with PB regarding same (1.5).	3.70	1050.00	3,885.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/06/24	JS	[redacted] with [redacted] regarding deposition scheduling (0.6); review and revise 30(b)(6) notice (0.7); review and evaluate Whinstone deficiency letter and our response to same (1.0); evaluate alleged payment defaults by Whinstone aside from profit-share underpayment (0.8); outline high-priority action items for the week and prepare [redacted] regarding same (1.0); correspond with Foley regarding MSJ scheduling (0.2); call with J. Cohn regarding MSJ response on miner-ownership issue (0.2).	4.50	875.00	3,937.50
10/06/24	PB	Draft response to document production deficiency letter and correspondence regarding same (6.1); teleconferences with expert [redacted] regarding data analysis (0.5).	6.60	725.00	4,785.00
10/06/24	HM	Continue reviewing and analyzing prior testimony of Whinstone and Riot witnesses from temporary injunction hearings (1.2).	1.20	600.00	720.00
10/07/24	VO	Attend team conference to discuss deposition prep (0.9); attend team conference regarding trial preparation and related action items including witness list (2.4).	3.30	875.00	2,887.50
10/07/24	PS	Attend teleconference with EB, BA, VO, JS, CS, and PB regarding trial preparation and related action items including witness list.	2.40	1250.00	3,000.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/07/24	EB	Attend teleconference with BA regarding action items including further revisions to Rule 30(b)(6) deposition notice (0.1); further revise and correspond with co-counsel regarding same (0.1); review and respond to further correspondence from [redacted] regarding information for [redacted] (0.2); continue drafting portions of same (2.0); attend teleconference with BA, PB, HM, and [redacted] regarding same (1.2); attention to resulting action items including instructing HM regarding additional documents for [redacted] (0.2); prepare for (0.1) and attend portion of (0.8) teleconference with VO, JS, PB, SR, HM, and W. Thompson and A. Swartz regarding deposition preparation and coordination; advise ASA regarding revisions to witness preparation materials and draft deposition notice for first deponent (0.1); review and respond to team correspondence regarding additional discovery and expert-related issues (0.3); attend teleconference with PS, BA, VO, JS, CS, and PB regarding trial preparation and related action items including witness list (2.4); review and respond to update from TT regarding [redacted] testimony and evidence in support of [redacted] report (0.1).	7.60	1100.00	8,360.00
10/07/24	BA	Review draft response to Whinstone's discovery letter drafted by PB, correspond with JS regarding same, and propose edits to same (0.7); confer with EB regarding edits to 30(b)(6) notice (0.1); continue outlining and drafting trial brief (2); confer with JS, EB, VO, PS, CS, and PB to discuss trial preparation and priority action items including witness list (2.4); review draft witness list, correspond with HM and team regarding revisions to same, convey same to bankruptcy counsel, review edits from bankruptcy counsel, review Whinstone's witness list, and review and approve final witness list for service (0.8); confer with [redacted], EB, HM, and PB regarding preparation of expert report (1.2); review deposition notices from Whinstone's counsel, correspond with JS regarding same, review response from Whinstone's counsel regarding same, review correspondence from A. Swartz regarding proposed deposition assignments, and correspond with JS, EB, HM, and PB regarding same (0.3).	7.50	1050.00	7,875.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/07/24	JS	Prepare materials and [redacted], W. Thompson, and VO regarding deposition preparation and planning (0.9); confer with J. Cohn regarding Whinstone request to alter MSJ schedule (0.1); attend teleconference with counsel for potential witness (0.2); advise PB regarding expert issue (0.1); attend teleconference with BA, EB, CS, PB, VO, PS regarding trial strategy and [redacted] (2.4); further prepare for defensive deposition of [redacted] (2.9); evaluate and draft topics for offensive depositions (0.5); review and revise correspondence regarding discovery deficiencies (0.6); create deposition scheduling plan and correspond with Foley regarding same (0.7); attend portion of call with EB, PB, A. Swartz, and W. Thompson regarding deposition coordination (0.4); evaluate [redacted] issues (0.4); continue outlining trial presentation strategy (1.6).	10.80	875.00	9,450.00
10/07/24	SR	Attend videoconference with EB, JS, HM, PB, and LKC team to discuss deposition preparations and planning (0.9); continue drafting [redacted] deposition preparation [redacted] (6.9).	7.80	650.00	5,070.00
10/07/24	SB	Review RIOT presentations and assist with citations and cite checking of [redacted] expert report.	6.30	325.00	2,047.50
10/07/24	CS	Meet with JS, BA, EB, PS, and PB regarding trial strategy and themes (2.4); continue drafting and revising motion for partial summary judgment (6.1); review draft of trial brief (0.5).	9.00	725.00	6,525.00
10/07/24	CHH	Update case management materials (1.0); correspond with HM regarding same (0.2); review and analyze C. Harris (Whinstone) documents and designate same for further review (2.2); correspond with A. Swartz regarding same (0.2); summarize [redacted] testimony for trial use and confer with HM regarding same (0.8).	4.40	325.00	1,430.00
10/07/24	JH	File ongoing discovery exchanges (0.5); prepare additional documents for expert C. Griffey at HM request (0.5); continue reviewing produced communications to assist with preparation for upcoming depositions (3.0).	4.00	325.00	1,300.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/07/24	PB	Attend teleconference with Stris and LKC teams regarding witness preparation (0.9); revise correspondence to Whinstone regarding discovery deficiencies (1.6); attend trial preparation strategy call with PS, VO, JS, EB, BA, and CS (2.4); attend part of teleconference with expert [redacted] regarding [redacted] issues (1.1); assist in preparation of expert report [redacted] (2.8).	8.80	725.00	6,380.00
10/07/24	ASA	Create revised [redacted] to assist with deposition preparation at request of EB (3.0); collect Riot SEC filings at request of HM and create ShareFile link for distribution (1.0).	4.00	325.00	1,300.00
10/07/24	HM	Draft, revise, and circulate Debtors' proposed fact witness list (0.8); attend portion of teleconference with PB, SR, EB, JS, VO, and LKC to discuss deposition preparation (0.8); draft and circulate deposition preparation [redacted] for organization and collaboration (1.5); attend teleconference with [redacted], PB, EB, BA to discuss expert report, documents, and opinions (1.2); confer with CH about organizing production log (0.2); confer with CH about summarizing temporary injunction hearing testimony by Whinstone witnesses (0.1); confer with AA, MV, and JHA regarding sending additional documents to C. Griffey for expert report preparation (0.5); create and organize materials for deposition preparation and collaboration (1.2); draft materials regarding trial proof and send to EB for review (3.8).	9.90	600.00	5,940.00
10/07/24	TT	Review and analyze Temporary Injunction Hearing on March 2024 and analyze [redacted] regarding alleged OSHA violations, equipment maintenance issues and spill incidents at Rockdale site to assist in preparation for depositions and trial (8.0); draft memorandum to EB regarding same analysis (1.0).	9.00	480.00	4,320.00
10/07/24	MV	Review correspondence from EB and create document searches in support of expert depositions (1.5); revise exhibit list and prepare contract exhibits (4.0); review local court rules and standing order regarding exhibit list and protocol for trial, and correspondend with team regarding same (1.0).	6.50	400.00	2,600.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/08/24	PS	Review revisions to motion for partial summary judgment and confer with team regarding same.	1.80	1250.00	2,250.00
10/08/24	EB	Review draft and correspond with JS and PB regarding questions concerning patent portion of [redacted] (0.2); continue drafting portions of [redacted] (6.4); attend teleconference with PB, [redacted] regarding information in support of [redacted] report (1.1); attend teleconference with PB regarding resulting action items (0.2); attend portion of teleconference with BA, JS, PB, HM, J. Cohn, W. Thompson, and A. Swartz regarding coordination between and among expert reports and positions (1.2); review, analyze, and confer with TT regarding analysis of evidence in support of [redacted] (0.3); review draft C. Harris deposition notice and advise ASA regarding revisions to same (0.1); review, propose [redacted], and correspond with BA, JS, and M. Frederick and LKC team regarding finalization of Rule 30(b)(6) notice (0.1).	9.60	1100.00	10,560.00
10/08/24	BA	Attend hearing on briefing schedule (0.2); participate in call with JS, EB, PB, W. Thompson, A. Swartz, and J. Cohn to discuss expert opinions (1.5); research and draft trial brief (0.8); attend teleconference with client, co-counsel and bankruptcy counsel (0.9); correspond with JS and with bankruptcy counsel regarding drafting of expert disclosure for [redacted] (0.2); review correspondence from J. Cohn regarding expert disclosure of [redacted] (0.2); review and revise draft summary judgment motion and correspond with JS regarding same (2.2).	6.00	1050.00	6,300.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/08/24	JS	Prepare for and attend hearing on emergency motion regarding MSJ schedule (1.2); call with J. Cohn (0.2) and W. Thompson and J. Cohn (0.1) regarding [redacted] testimony; call with A. Swartz, W. Thompson, J. Cohn, PB, BA, EB, and HM regarding deposition planning and expert coordination (1.5); call with client, LKC, Stris, and Quinn teams regarding high priority action items (0.9); work on [redacted] report (1.5); review and revise summary judgment motion (3.4); evaluate status and coordinate next steps on miner-level data transfer in connection with Foley letters (0.3); call with Province and Quinn teams regarding scheduling of [redacted] (0.3); evaluate research regarding Whinstone breaches (0.4) and potential insolvency issues (0.4); continue deposition defense [redacted] for [redacted] depositions (1.0).	10.80	875.00	9,450.00
10/08/24	SR	Continue drafting [redacted] deposition preparation [redacted]	9.70	650.00	6,305.00
10/08/24	SB	Review RIOT presentations and fill in cites for [redacted] in [redacted] for EB.	.50	325.00	162.50
10/08/24	CS	Review and respond to correspondence from SR regarding preparation materials for [redacted] deposition (0.6); draft declaration of [redacted] in support of summary judgment including identification and incorporation of accompanying documents (3.5); draft proposed order granting motion for partial summary judgment (0.4); review and analyze supporting contract-related case law (1.1); continue revising motion including to incorporate edits and respond to comments from PS (1.8).	7.40	725.00	5,365.00
10/08/24	CHH	Assist MV and A. Swartz with review of materials for exhibit list and exhibit collection.	.80	325.00	260.00
10/08/24	JH	Finish reviewing documents for JS to assist with depositions and trial preparation.	3.50	325.00	1,137.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/08/24	PB	Prepare for (0.3) and attend (1.1) teleconference with EB, [redacted] regarding supporting materials for expert reports; attend follow-up call with EB regarding same (0.2); analyze data regarding inter-entity transfers (1.2); attend portion of teleconference with W. Thompson, A. Swartz, J. Cohn, EB, BA, and JS regarding depositions and expert work (1.1); teleconference with [redacted] regarding upcoming [redacted] expert report (0.9); analyze supporting data regarding expert report of [redacted] (3.2); confer with HM regarding discovery issues and respond to correspondence regarding same (0.3).	7.10	725.00	5,147.50
10/08/24	ASA	Prepare deposition notices for C. Harris, D. Schatz, H. Davidson, J. McGonegal, and K. Haugen, and confirm deposition scheduling specifics (2.8); collect additional documents from Whinstone production for provision to C. Griffey (0.5); continue to assist attorneys with defensive deposition preparation materials (0.7).	4.00	325.00	1,300.00
10/08/24	HM	Revise, finalize, and serve C. Harris deposition notice (1.2); attend teleconference with BA, JS, EB, PB, and LKC to discuss expert reports and deposition preparation (1.5); confer with PB about documents to send to [redacted] (0.2); collect and prepare additional invoices for [redacted] (3.2); review and respond to team correspondence regarding outstanding document discovery issues and upcoming depositions (3.0); attend emergency motion on scheduling before Judge Alfredo Perez (0.2); review and summarize insolvency research for JS (0.3); correspond with counsel for Priority Power Management about subpoena response (0.2); update master deposition schedule (0.5).	10.30	600.00	6,180.00
10/08/24	TT	Review and analyze December 2023 and March 2024 Temporary Injunction Hearings regarding site safety issues in preparation for depositions and trial (8.5); Draft memorandum to EB regarding review and analysis (1.5)	10.00	480.00	4,800.00
10/08/24	MV	Continue preparing exhibit list and exhibits for trial.	7.00	400.00	2,800.00
10/09/24	PS	Prepare for and confer with JS regarding insolvency issues (0.7); research regarding same (1.4); confer with P. Tomasco regarding same (0.2).	2.30	1250.00	2,875.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/09/24	EB	Continue drafting portions of [redacted] (4.6); correspond with [redacted] regarding same including analysis of additional documents in support of same (0.4); correspond with ASA and Fulcrum regarding engagement for graphics and trial support and potential graphic for [redacted] (0.3); correspond with (0.2) and attend teleconferences with (0.3) HM regarding additional documents for [redacted] review and respond to team correspondence regarding various issues including procedure for Temple sales bids and deposition preparation (0.2); begin reviewing [redacted] (0.5); attend teleconference with PB regarding reconciling and revising statements in [redacted] versus [redacted] (0.2); confer with ASA regarding tables for [redacted] (0.2).	6.90	1100.00	7,590.00
10/09/24	BA	Confer with HM, PB, and JS regarding discovery conferral issues (0.2); review and analyze proposed revisions to summary judgment motion, and correspond and confer with JS regarding same (0.4); participate in teleconference with client and bankruptcy counsel regarding Riot's request to participate in Temple bid process (0.6); confer with PB, A. Swartz, and W. Thompson regarding expert reports (1.5); draft and revise partial summary judgment motion (2.2); correspond and confer with JS regarding [redacted] deposition, disclosure, and related issues (0.3).	5.20	1050.00	5,460.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/09/24	JS	Call with J. Cohn regarding [redacted] (0.2); call with P. Tomasco regarding same (0.1); calls with PB regarding miner data production (0.3); call with [redacted] regarding [redacted] production (0.1); call with BA regarding MSJ edits (0.1); call with CS regarding same (0.1); call with [redacted] regarding deposition prep (0.2); call with W. Thompson regarding solvency questions (0.4); call with [redacted] regarding [redacted] (0.1); call with [redacted] regarding [redacted] and litigation overlay (0.4); prepare for and attend [redacted] call regarding [redacted] report (1.3); call with P. Tomasco regarding [redacted] testimony (0.2); calls with J. Cohn and W. Thompson regarding plan for insolvency testimony (0.7); prepare for and attend [redacted] (0.9); prepare for and attend conferral call with Foley regarding outstanding discovery issues (2.1); plan for depositions of RHDM and Whinstone witnesses (1.3); review and revise [redacted] (3.1); review and revise [redacted] (1.5) and confer with PB regarding same (0.3); review and evaluate [redacted] and propose edits to same (1.0); final review of 30(b)(6) notice (0.2); correspond with Foley regarding depositions and other discovery issues (1.0).	15.60	875.00	13,650.00
10/09/24	SR	Review and revise [redacted] deposition preparation material (2.0); assist JS and team in preparing for other depositions (2.7).	4.70	650.00	3,055.00
10/09/24	CS	Begin drafting opposition to Whinstone's motion for partial summary judgment.	7.30	725.00	5,292.50
10/09/24	CHH	Summarize categories of necessary trial exhibits for collection and emails with MV regarding same (0.8); review and analyze documents provided to [redacted] and collect Bates numbers for same in preparation for trial (2.0); review and analyze all produced invoices in discovery database, and summarize and collect same for [redacted] (expert) further review (2.0); create various ShareFile links to transfer further documents to experts in preparation for reports (0.2).	5.00	325.00	1,625.00
10/09/24	JH	Prepare documents for VO to assist with deposition and trial preparation.	.80	325.00	260.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/09/24	PB	Analyze draft report of [redacted] (1.2); correspondence regarding same (0.6); analyze supporting materials to assist in preparation by [redacted] of draft [redacted] (3.2); revise [redacted] regarding background matters (1.7); attend strategy call with W. Thompson, A. Swartz, and BA regarding site safety expert (1.5); call with JS regarding potential report of [redacted] (0.3).	8.50	725.00	6,162.50
10/09/24	ASA	Create table of power curtailment credits at request of EB to assist drafting efforts (0.9); review RIOT presentations and Bates-stamped material cited by SB for accuracy at request of EB (1.7); execute agreement between Rhodium and Fulcrum at request of EB (0.5); create shared folder and link for expert [redacted] to upload and download material (0.4); gather material for use by [redacted] at request of HM (0.6); coordinate with HM, CHH, and JHA to create list of Bates-stamped material considered by [redacted] (1.4).	5.50	325.00	1,787.50
10/09/24	HM	Teleconference with EB regarding provision of documents to [redacted] (0.3); attend teleconference with JS, and [redacted], and [redacted] to discuss Rhodium's safety measure at Rockdale (0.6); attend meet-and-confer teleconference with JS, A. Swartz, P. Tomasco, and Whinstone's counsel to discuss deposition locations and outstanding document discovery issues (0.7); coordinate with CH, JHA, and AA to update Expert Shared Materials log with Bates numbers for all documents considered by [redacted] and [redacted] (4.4); review and revise [redacted] (0.5); collect and send all Rhodium safety procedures to [redacted] (0.5); coordinate with CH and MV to review and analyze documents sent from Rhodium to ensure all relevant documents are sent to [redacted] (1.0); review and respond to team correspondence regarding expert reports and depositions (2.5).	10.50	600.00	6,300.00
10/09/24	MV	Continue preparing exhibit list and trial exhibits.	6.00	400.00	2,400.00
10/10/24	VO	Review [redacted] email history and work on outline for [redacted] deposition (3.7); review 30(b)(6) notification from Whinstone and emails with JS and CH regarding next steps in light of same (0.2).	3.90	875.00	3,412.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/10/24	EB	Attend teleconference with PB, [redacted], and [redacted] regarding information to address issues identified by [redacted] (0.2); review and comment on draft [redacted] expert report including to address potential overlap with other reports (1.5); attend portion of teleconference with [redacted] regarding same (0.9); review and analyze additional analysis of evidence and testimony from TT in support of [redacted] reports (0.3); correspond with JS and A. Swartz regarding potential revisions to [redacted] (1.0); review and comment on further revised [redacted] (0.6); correspond with [redacted] regarding Fulcrum engagement (0.1); correspond with Fulcrum regarding graphic for [redacted] (0.1); attend teleconference with C. Hickey (Fulcrum) regarding same (0.5); confer with NC regarding potential revisions to [redacted] and review and incorporate same (0.2); correspond with BA, JS, PB, and HM regarding Rhodium information and strategic questions relating to potential further revisions to same (0.3); review and respond to team correspondence regarding action items including deposition coverage (0.2); attend portion of [redacted] teleconference with BA, JS, PB, HM, J. Cohn, W. Thompson, and A. Swartz (0.4); correspond with [redacted] regarding revisions to [redacted] (0.3); correspond with BA, JS, PB, HM, J. Cohn, W. Thompson, and A. Swartz regarding further revisions to same (0.2); begin revising same including to incorporate initial further revisions from [redacted] and BA (1.6).	8.40	1100.00	9,240.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/10/24	BA	Review [redacted] from [redacted] and correspond with PB regarding revisions to same (0.8); review [redacted] from [redacted] and correspond with JS regarding same (0.8); draft and revise motion for partial summary judgment (3.0); correspond with EB regarding opinion of [redacted] (0.1); participate in teleconference with [redacted] and team to discuss [redacted] (1.1); review and comment on draft report for [redacted] and correspond with EB regarding same (1.0); review Whinstone's 30(b)(6) topics, correspond with JS regarding same, and analyze potential witnesses and objections for same (0.7); review analysis from PB of potential discovery matters and correspond with PB, A. Swartz, and team regarding discovery priorities and potential compromises, and correspond with PB, team, and Whinstone's counsel regarding Whinstone's continued failure to provide verified interrogatory responses (0.3).	7.80	1050.00	8,190.00
10/10/24	JS	Prepare for and attend call with E. Winston and P. Tomasco regarding [redacted] deposition plan (0.9); confer with J. Cohn regarding same (0.3); call with [redacted] regarding [redacted] testimony (0.1); continue preparing for [redacted] deposition prep (0.3); calls with PB regarding [redacted] and discovery disputes with Whinstone (1.0); call with W. Thompson regarding same (0.5); call with [redacted] and attorney teams regarding [redacted] (1.0); attend portion of call with Stris and LKC teams regarding expert coordination (0.6); correspond with Foley regarding deposition coordination and privilege issues (0.4); advise HM regarding [redacted] (0.1); review documents related to [redacted] and [redacted] and evaluate reports in light of same (1.5); review edits to MSJ and add further revisions (1.5); review and evaluate [redacted] (0.6); review Foley 30(b)(6) notice and evaluate which witnesses to designate and potential objections (1.0).	9.00	875.00	7,875.00
10/10/24	SR	Begin drafting defensive deposition preparation [redacted].	2.20	650.00	1,430.00
10/10/24	CS	Draft opposition to Whinstone's motion for summary judgment.	8.20	725.00	5,945.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/10/24	CHH	Assist HM and MV with identification of documents for trial (3.3); attend meet and confer with PB and opposing counsel regarding document production disputes (0.8); review Whinstone's 30(b)(6) deposition notice and summarize topics in same for VO (0.3).	4.40	325.00	1,430.00
10/10/24	PB	Propose revisions to [redacted] (1.2); attend teleconference with [redacted], and EB regarding [redacted] in support of same (0.2); prepare for meet-and-confer including to analyze deficiencies in Whinstone discovery responses (1.7); attend meet-and- confer with CHH and counsel for Whinstone regarding same (0.8); attend teleconferences with JS regarding discovery issues and [redacted] (1.0); attend teleconference with [redacted] and [redacted] regarding [redacted] (1.0); confer with W. Thompson regarding same (0.3); attend teleconference with J. Cohn, A. Swartz, W. Thompson, JS, BA, EB, and HM regarding expert reports (0.7); review draft expert report of [redacted] and correspondence regarding same (0.7); review draft motion for summary judgment (0.3); correspond with BA, JS, HM, and A. Swartz regarding responses to additional discovery requests (1.1); prepare privilege log (0.6).	9.60	725.00	6,960.00
10/10/24	ASA	Create secure ShareFile link and gather site services invoices, hosting invoices, ancillary service invoices, and other miscellaneous invoices for use by [redacted] at request of HM (0.3); create ShareFile link for use by Fulcrum in preparation of graphics (0.2); review documents sent to [redacted] and confirm Bates number of produced versions (2.6).	3.10	325.00	1,007.50
10/10/24	HM	Correspond and assist BA, EB, VO, JS, PB, and LKC team with action items in support of expert reports, outstanding discovery, and deposition preparation (3.3); research objection deadlines for BA and revise, finalize, and serve Debtor's notice of 30(b)(6) deposition to Whinstone (2.1); qc documents sent to [redacted] (2.5); review and revise deposition notices (0.8); organize and send documents to [redacted] (0.2); attention to case management including deposition scheduling and qc calendaring of deadlines (0.9).	9.80	600.00	5,880.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/10/24	MV	Continue preparing exhibit list and exhibits for trial.	4.00	400.00	1,600.00
10/11/24	PS	Review [redacted] and confer with team regarding same.	.30	1250.00	375.00
10/11/24	EB	Continue revising [redacted] (5.2); advise HM and litigation fellows regarding action items in support of finalization of same including provision of additional documents to [redacted] and cite checking of [redacted] (0.6); attend teleconference with BA regarding potential further revision to [redacted] and upcoming corporate representative depositions (0.3); attend teleconference with [redacted] regarding revisions to [redacted] (0.3); review and implement edits and comments from J. Cohn regarding same (0.2); review further revisions from J. Cohn and incorporate same (1.8); correspond with Stris and LKC teams and [redacted] regarding same (0.5); attention to coordination between [redacted] including emails to PB and [redacted] (0.2); attend teleconference with JS regarding expert reports (0.3).	9.40	1100.00	10,340.00
10/11/24	BA	Review draft report for [redacted] and provide comments on same to EB (0.8); assist EB and team with identifying exhibits to [redacted] correspond with EB regarding same, confer with EB regarding same, and review and comment on further edits to same (0.9); confer with EB regarding 30(b)(6) strategy options and convey same to JS (0.3); review reply in support of motion to transfer and correspond with bankruptcy counsel regarding same (0.4); continue reviewing and revising motion for partial summary judgment, including incorporating revisions from JS and from A. Davis and M. Frederick, and correspond with CS and JS regarding next steps for same (3.1); confer with JS, PS, and HM regarding preparation and strategy for meet and confer on discovery matters with opposing counsel (0.8); continue analyzing issues for trial brief (0.3); correspond with A. Swartz regarding issue for [redacted] (0.1).	6.70	1050.00	7,035.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/11/24	JS	Attend teleconference with EB regarding [redacted] (0.3); correspond with CHH regarding overlap of Temple data room with productions (0.1); attend teleconference with CHH regarding same (0.1); advise PB regarding expert reports and discovery disputes with Whinstone (0.4); confer with BA, PB, and HM regarding outstanding discovery issues and meet and confer preparation (0.8); review and revise MSJ (1.8); review and evaluate MSJ opposition (1.0); continue preparing deposition and related trial strategy (2.9); further coordinate deposition timing and logistics (0.7); analyze and propose resolution of overlapping issues between [redacted] and [redacted] (1.1).	9.20	875.00	8,050.00
10/11/24	CHH	Download set of final, Bates-stamped contracts in suit for A. Swartz (Lehotsky) review (0.2); correspondence with ASA regarding same (0.2); meet and confer with PB and A. Howell (Foley) regarding document production disputes (1.3); continue reviewing discovery database to determine list of produced [redacted] documents and summarize findings to VO and PB (2.6); telephone call with JS regarding same (0.1); prepare sample of unproduced [redacted] documents for JS review (0.3).	4.70	325.00	1,527.50
10/11/24	JH	Update bankruptcy docket (0.8); confirm related information for HM (0.5); assist HM with transfer of additional documents to [redacted] (0.3); assist ASA with confirmation of materials sent to [redacted] (1.0); prepare additional documents for VO to assist with deposition preparation (2.5).	5.10	325.00	1,657.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/11/24	PB	Revise [redacted] regarding [redacted] (1.4); prepare for meet-and-confer with counsel for Whinstone regarding discovery issues (0.7); teleconference with AA regarding expert supporting material (0.1); teleconference with BA, JS, and AS regarding meet-and-confer preparation (0.8); teleconference with [redacted] and [redacted] regarding support for [redacted] (0.3); teleconference with supporting staff for [redacted] regarding support for draft report (0.5); meet-and-confer with counsel for Whinstone regarding document discovery issues (1.5); teleconference with [redacted] and team regarding draft report (1.0); teleconference with JHA regarding deposition preparation (0.2); conference with VO regarding case strategy (0.2); confer with MV regarding privilege logs (0.1); teleconference with JS regarding expert strategy (0.3); prepare and serve production 14 (1.4).	8.50	725.00	6,162.50
10/11/24	ASA	Confirm list of contracts previously sent to [redacted] at request of EB (0.4); search for specific provisions in said contracts at request of EB in support of report drafting (1.2); itemize by Bates number list of documents sent to [redacted] in support of report and exhibit finalization (7.6).	9.20	325.00	2,990.00
10/11/24	HM	Revise, finalize, and serve deposition notices of Kevin Haugen, David Schatz, Heath Davidson, and Jeff McGonegal (0.6); review and revise expert report of [redacted] (4.9); review and respond to team correspondence regarding scheduling and document discovery (2.2).	7.70	600.00	4,620.00
10/11/24	MV	Continue preparing and formatting privilege log (7.5); highlight descriptions for attorney review (0.5).	8.00	400.00	3,200.00
10/12/24	VO	Confer with JS regarding deposition planning, scheduling, and next steps.	.60	875.00	525.00
10/12/24	PS	Confer and email with team regarding expert reports, depositions, and trial planning.	1.50	1250.00	1,875.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/12/24	EB	Correspond with [redacted] regarding potential further revisions to ERCOT expert report (0.4); continue revising same (3.2); correspond with HM regarding cite checking and support for finalization of same (0.1); attend teleconference with PB and JS regarding reconciliation of [redacted] with [redacted] and [redacted] (0.6); correspond with PB and [redacted] regarding same (0.5); confer with J. Cohn regarding further revisions to same (0.3); create new potential exhibits for [redacted] to support [redacted] analysis and correspond with [redacted] regarding incorporation of same (0.9); attend teleconference with JS regarding high priority action items including expert report coordination and deposition coverage (0.3).	6.30	1100.00	6,930.00
10/12/24	BA	Review edits from W. Thompson and J. Cohn on motion for partial summary judgment and correspond with JS and CS regarding same (0.8); review and comment on opposition to motion for partial summary and correspond with JS regarding Whinstone's supplementation of same and communications with opposing counsel regarding deposition scheduling (0.4).	1.20	1050.00	1,260.00
10/12/24	JS	Call with VO regarding deposition of [redacted] (0.6); call with [redacted] regarding attendance at [redacted] deposition (0.1) and with P. Tomasco regarding same (0.1); call with W. Thompson regarding trial witness planning (0.2); attend portion of call with PB and EB regarding expert report on [redacted] (0.3); review and evaluate [redacted] (1.5); review [redacted] and propose questions regarding same (2.4); evaluate edits to MSJ from LKC (0.6); continue preparing trial plan (2.0).	7.80	875.00	6,825.00
10/12/24	CHH	Prepare exhibit of list of documents reviewed in preparation of [redacted] report.	1.30	325.00	422.50
10/12/24	PB	Review team correspondence regarding draft expert reports (0.2); correspond with [redacted] regarding draft report (0.8); attend teleconference with EB and JS regarding same (0.6); attend teleconference with LKC team regarding draft [redacted] report (0.4); further correspond with [redacted] and colleagues regarding revisions to draft report (0.4); revise draft privilege log in preparation for service (3.6).	6.00	725.00	4,350.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/12/24	HM	Organize documents sent to [redacted] within Expert Shared Materials spreadsheet (0.7); coordinate with CH to create Exhibit B, list of documents reviewed, for [redacted] report (0.2).	.90	600.00	540.00
10/13/24	VO	Continue to review [redacted] email history and work on outline for [redacted] deposition (7.1); emails with PB, JS, and JH regarding same (0.4).	7.50	875.00	6,562.50
10/13/24	PS	Confer and email with team regarding expert reports, depositions, and trial planning.	.80	1250.00	1,000.00
10/13/24	EB	Correspond with HM, SD, and CHA regarding cite check of materials considered exhibit for [redacted] report (0.3); review and respond to correspondence from A. Swartz, JS, and PB regarding [redacted] (0.5); attend teleconference with JS (0.1) and portion of teleconference with JS and PB (0.2) regarding same; confer with PS and JS regarding deposition and trial coverage (0.2).	1.30	1100.00	1,430.00
10/13/24	BA	Review correspondence and draft reports and correspond with JS and PB regarding strategy questions for expert reports (0.4); participate in teleconference with litigation team regarding expert reports (0.5); confer with JS and PB regarding strategy for and revisions to [redacted] (0.7); participate in teleconference with litigation team and data center expert (0.2); confer with JS and PB regarding strategy for issues in [redacted] and confer with [redacted] regarding same (1.1); review and revise motion for partial summary judgment (1); correspond with PS, JS, and EB regarding trial strategy (1).	4.00	1050.00	4,200.00
10/13/24	JS	Continue advising and assisting with revisions to [redacted] and [redacted] (5.9); review and propose revisions to [redacted] (1.1); review and revise MSJ (0.5); continue outlining for [redacted] deposition preparation (0.8); review and evaluate Rule 30(b)(6) notice and objections to same (1.0); continue [redacted] outline and adding questions to same (1.3).	10.60	875.00	9,275.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/13/24	CHH	Review [redacted] report in conjunction with exhibit of list of documents reviewed to ensure comprehensiveness (0.8); review JS emails regarding potentially important documents and review document database for same to confirm production (0.5).	1.30	325.00	422.50
10/13/24	PB	Continue working with EB, BA, JS, LKC teams, and experts to assist with final revisions to [redacted] and [redacted] (8.7); prepare draft privilege log (3.4).	12.10	725.00	8,772.50
10/13/24	HM	Draft [redacted] (1.5); revise and finalize [redacted] expert report with exhibits (1.1).	2.60	600.00	1,560.00
10/14/24	VO	Continue to prepare for [redacted] deposition preparation, including further review of documents, and identify additional documents for [redacted] deposition outline in connection with same (5.6); review and analyze 30(b)(6) topics to plan for witness preparation (0.8); confer with PB regarding same (0.3); confer with JS regarding same (0.3); prepare recommendations for additional questions and documents to be added to [redacted] and send to W. Thompson and A. Swartz (2.4).	9.40	875.00	8,225.00
10/14/24	PS	Review and comment on draft motion for summary judgment (1.8); confer with BA regarding deposition strategy (0.2); advise VO, and PB regarding [redacted] (0.3).	2.60	1250.00	3,250.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/14/24	EB	Correspond with JS regarding materials in support of expert depositions (1.2); advise HM regarding final revisions to and finalization and service of fully executed report and attachments (0.6); review correspondence from [redacted] (0.1); review and comment on portions of draft summary judgment motion (0.5); attend teleconference with BA and JS regarding deposition and trial preparation (1.2); begin preparing for [redacted] deposition preparation (4.6); correspond with A. Swartz regarding action items including equipment expert deposition preparation (0.1); review near-final equipment expert report (0.5); correspond with BA, JS, PB, and A. Swartz regarding finalization of same (0.1); attend portion of deposition preparation teleconference with BA, JS, PB, and LKC team members (0.3); review correspondence regarding [redacted] expert reports and advise JS and PB regarding same (0.4).	9.60	1100.00	10,560.00
10/14/24	BA	Continue reviewing and revising summary judgment motion and drafting and revising supporting declarations (4.0); review and comment on materials for C. Harris deposition (1.0); attend teleconference with EB and JS regarding deposition and trial planning (1.2); advise HM and A. Swartz regarding revisions to deposition preparation and tracking information (0.4); confer with PS regarding upcoming depositions (0.2); review updated report schedules from [redacted] and advise PB regarding final updates to and finalization of same (1.6); attend teleconference with PB regarding trial planning (0.5); confer with Stris and LKC teams regarding upcoming depositions and Rule 30(b)(6) objections and correspond with opposing counsel regarding same (1.2); review [redacted] conveyed by P. Tomasco, review AAA confidentiality rules, and correspond with JS and HM regarding next steps (0.5).	10.60	1050.00	11,130.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/14/24	JS	Attend teleconference with EB and BA regarding trial planning (1.2); assist W. Thompson with preparation of C. Harris deposition outline (2.5); confer with VO regarding 30(b)(6) deposition preparation (0.3); confer with J. Cohn regarding expert witness next steps (0.5); review and revise [redacted] and assist in preparing same for service (5.4); prepare for and confer with LKC team regarding Schatz and Davidson deposition preparation (1.9); continue preparing [redacted] defensive deposition materials (2.0).	13.80	875.00	12,075.00
10/14/24	CS	Draft BA declaration in support of motion for partial summary judgment and gather exhibits to accompany the same (0.9); revise [redacted] in support of same to incorporate comments from BA (0.7); review and incorporate edits to motion for partial summary judgment (1.0); continue drafting opposition to Whinstone's motion for partial summary judgment (2.9).	5.50	725.00	3,987.50
10/14/24	CHH	Finalize exhibits to [redacted] (0.7); share exhibits to motion for partial summary judgment for client review (0.1); compile produced [redacted] text messages for VO further review (0.1); finalize exhibits to [redacted] in support of motion for partial summary judgment (1.4).	2.30	325.00	747.50
10/14/24	PB	Assist in revision and finalization of expert reports including conferring with [redacted] BA, and JS regarding same (5.1); attend teleconference with BA regarding trial plan (0.5); continue preparing privilege log for service to Whinstone (5.8).	11.40	725.00	8,265.00
10/14/24	ASA	Draft expert deposition notices for HM (2.5); update case management materials and files to reflect case updates and recent correspondence (1.0); organize deposition materials for Stris and LKC teams (0.5).	4.00	325.00	1,300.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/14/24	HM	Review and respond to team correspondence regarding action items in support of finalization of expert reports (2.0); review, revise, finalize, and serve expert reports of C. Griffey, N. Miljkovic, T. Lewis, and E. Brown (5.0); advise ASA regarding notices of deposition for Whinstone experts (0.5); correspond with VO and JS regarding [redacted] deposition (0.1); update master deposition schedule (0.5).	8.10	600.00	4,860.00
10/15/24	VO	Confer with JS and [redacted] to provide update on recent developments, status of case, strategy, and next steps (0.4); attend videoconference with JS and [redacted] regarding 30(b)(6) deposition preparation (1.0).	1.40	875.00	1,225.00
10/15/24	PS	Emails with team regarding Slovack designation and next steps (0.2); review Whinstone expert reports and confer with team regarding same (1.5).	1.70	1250.00	2,125.00
10/15/24	EB	Review correspondence regarding final expert reports and documents served by Whinstone (0.1); attend teleconference with BA regarding high priority action items including potential [redacted] by [redacted] to two Whinstone experts (0.3); correspond with [redacted] regarding same, request for documents relied upon by Whinstone damages expert, and teleconferences to discuss questions in support of C. Harris deposition and [redacted] (0.2); attend teleconference with JS regarding action items including [redacted] support for C. Harris deposition and information in support of teleconference with [redacted] regarding same (0.5); correspond with JS and W. Thompson regarding documents and information in support of same (0.2); review and analyze Whinstone damages and ERCOT reports and related materials to support [redacted] (4.0); begin [redacted] same (1.2); review final Griffey excel file and correspond with BA and HM regarding production of same (0.4); review and respond to team correspondence regarding additional issues including response to request from Whinstone for next profit share calculation and hot documents for upcoming depositions (0.5).	7.40	1100.00	8,140.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/15/24	BA	Confer with EB regarding Whinstone expert reports and potential responses and rebuttal (0.4); participate in teleconference with litigation counsel to discuss preparation for offensive depositions (1.2); participate in teleconference with JS and [redacted] to discuss deposition preparation and rebuttal topics (0.5); review and analyze expert reports served by Whinstone and correspond with team and experts regarding same, including conveying Whinstone reports to Rhodium experts and correspond with AA, EB, HM, and A. Swartz as necessary to convey supporting materials from Whinstone experts to Rhodium experts and supporting materials from Rhodium experts to Whinstone (3.5); review additional edits on summary judgment motion from bankruptcy counsel and correspond with CS and JS regarding next steps to begin finalizing same (0.8); convey analysis and potential issues regarding Whinstone's disclosure of Slovak as fee witness to litigation and bankruptcy team, research same, and correspond with same and JS and PS regarding next steps (1.5); review question from client regarding updated profit share calculation and correspond with team regarding need for input from bankruptcy counsel (0.2); review Whinstone's privilege log, review draft privilege log for Rhodium, correspond with PB and JS regarding privilege and redaction issues flagged by PB, correspond with PB and EB regarding common interest privilege, and review and approve final log for service (1.5); correspond with JS regarding potential approach to objections to 30(b)(6) notice, draft objections letter, and convey same to team for review (2).	11.60	1050.00	12,180.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/15/24	JS	Confer with VO and [redacted] to provide update on recent developments, status of case, strategy, and next steps (0.4); attend portion of [redacted] prep call with LKC (1.9); attend portion of zoom with EB and W. Thompson regarding C. Harris deposition (0.4); attend portion of 30b6 deposition prep with VO and [redacted] (0.9); confer with [redacted] and BA regarding [redacted] issues in connection with C. Harris deposition (0.5); prepare for and attend planning call for depositions of McGonegal and Haugen with Stris and LKC teams (1.6); attend Rhodium weekly touchpoint call with all counsel (1.0); call with [redacted] regarding 30b6 topics and [redacted] testimony (0.5); review and evaluate 30b6 topics in connection with objection and conferral (0.3); prepare for C. Harris deposition (7.7).	15.20	875.00	13,300.00
10/15/24	CS	Revise summary judgment motion, including to incorporate edits from PS and Quinn Emanuel (7.0); continue drafting opposition to Whinstone's summary judgment motion (0.9).	7.90	725.00	5,727.50
10/15/24	CHH	Review and correspond with JS regarding documents for C. Harris (1.0); finalize exhibits to BA declaration in support of motion for partial summary judgment (1.2); cite-check and proofread N. Nichols (Rhodium) and BA declarations in support of same (0.6); attention to claw back deletions to ensure compliance with local rules (0.4); create shareable, secure links for transmission of data to C. Griffey (expert) and opposing counsel (0.2); prepare reproduction of text messages for opposing counsel (0.5).	3.60	325.00	1,170.00
10/15/24	JH	Prepare various expert materials reviewed by Whinstone experts for ShareFile delivery to Rhodium experts for HM (0.8); continue populating running internal exhibit list (3.0).	3.80	325.00	1,235.00
10/15/24	PB	Prepare, revise, finalize, and serve privilege log (4.8); prepare production of non-privileged [redacted] documents (2.1); prepare for defense of deposition of [redacted] (2.0); teleconference with A. Davis regarding expert reports (0.2); attend case team call regarding deposition preparation (1.0); review and analyze Whinstone damages expert report (1.4)	11.50	725.00	8,337.50
10/15/24	ASA	Assist BA and EB with provision of additional materials to C. Griffey (1.4); attention to organization and tracking of material sent to experts (0.3).	1.70	325.00	552.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/15/24	HM	Review and respond to team correspondence regarding deposition preparation, documents relied on by Whinstone's experts, and documents to share with [redacted] and Foley (4.4); attend teleconference with VO, JS, PB, HM, BA and J. Cohn, A. Davis, T. Disher, and M. Frederick (LKC) to discuss deposition strategy (1.3); revise, finalize, and serve deposition notices of Benjamin Gibson, Nicholas Burnett, and Richard Peters (1.0); revise deposition notices of Jeffrey Matthews and Shams Siddiqi (0.2); review and analyze correspondence with opposing counsel relating to discovery (0.8); review and analyze Whinstone's amended responses to Debtors' requests for admission (1.5).	9.20	600.00	5,520.00
10/15/24	MV	Continue reviewing documents for and updating exhibit list.	6.00	400.00	2,400.00
10/16/24	VO	Review and revise [redacted] and prepare email to team regarding next steps for same (0.6); confer with JS to get update on C. Harris deposition takeaways, discuss [redacted], and discuss [redacted] deposition preparation strategy and next steps (1.0).	1.60	875.00	1,400.00
10/16/24	EB	Begin preparing to depose Whinstone exert S. Siddiqi (ERCOT) (2.0); prepare for (0.2) and attend (0.7) teleconference with BA and [redacted] regarding [redacted] continue drafting portions of same (1.5); correspond with HM and CHH regarding management and tracking of additional documents sent to [redacted] (0.2); correspond with [redacted], BA, JS, and HM regarding additional documents and information in support of [redacted] (0.3); attend portion of teleconference with BA, PB, A. Davis, and [redacted] regarding [redacted] (0.7); correspond with [redacted], and ASA regarding confirmation of witnesses and trial attendees (0.1); correspond with BA and JS regarding update to Stris and LKC teams regarding trial graphics and hot seat vendor (0.1); review [redacted] report (0.2); review and respond to Stris team correspondence regarding high priority expert-related action items and motion for partial summary judgment (0.5).	6.50	1100.00	7,150.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/16/24	BA	Review 30(b)(6) objections from Whinstone and review and respond to team correspondence regarding same and Whinstone's privilege log (0.4); advise HM regarding cite checking and service of 30(b)(6) objection letter (0.3); correspond with EB, JS, and HM regarding questions from [redacted] (0.5) and attend portion of teleconference with EB and [redacted] to discuss [redacted] report (0.5); correspond and confer with [redacted] regarding witness list and finalization of summary judgment documents (0.1); attention to same, including correspondence with [redacted] regarding declaration and implementation of edits from bankruptcy counsel (3.2); review materials and update JS and team regarding depositions and high priority action items (0.6); correspond with M. Thomas rebarding changes to deposition schedule (0.2); review and approve service of supplementation to [redacted] report (0.1); review protective order for [redacted] and correspond with JS regarding same (0.2); correspond with PS regarding discovery issues and supplementation (0.5); continue analyzing Whinstone's damages expert report to prepare for call with Stoneturn and for deposition (1.0); participate in teleconference with PB, EB, and [redacted] to discuss responses to Whinstone's expert reports and potential rebuttal reports (0.8).	8.40	1050.00	8,820.00
10/16/24	JS	Prepare for and attend deposition of C. Harris and debrief (9.5); confer with VO regarding next steps in light of C. Harris deposition, 30b6 issues, and [redacted] deposition prep (1.0); confer with BA regarding C. Harris deposition and next steps (0.3); review N. Nichols declaration in support of MSJ (0.4); correspond with Stris, LKC, and Quinn teams regarding high priority trial preparation items and coordination with additional outside counsel and NDA (1.4); call with J. Cohn regarding deposition planning in light of witness 30b6 designations (0.3); review Whinstone 30b6 designation and objections in connection with meet and confer (0.5); review and propose revisions to [redacted] [redacted] (0.7); continue preparation for [redacted] deposition (0.3).	14.40	875.00	12,600.00
10/16/24	SR	Correspond with team regarding [redacted] deposition logistics (0.5); review case file and notes in connection with preparations for the same (1.1).	1.60	650.00	1,040.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/16/24	SB	Cite check Motion for Partial Summary Judgment for CS.	4.40	325.00	1,430.00
10/16/24	CS	Continue drafting response to Whinstone's motion for partial summary judgment (1.1); review and revise Debtors' motion for partial summary judgment (4.5); review cite check of motion for partial summary judgment (.5); review finalized exhibits in support of the same (.4); review and finalize declarations in support of the same (.8); add tables to motion for partial summary judgment (.9); file sealed and unsealed versions of motion for partial summary judgment (1)	9.20	725.00	6,670.00
10/16/24	CHH	Cite-check and proofread motion for partial summary judgment (2.5); finalize new exhibits for BA declaration in support of same and proofread declaration accordingly (0.6); review and analyze documents in preparation for expert depositions and emails with EB regarding same (0.2); prepare and download documents for [redacted] for A. Swartz (Lehotsky) further review (0.4); review and organize material in preparation for [redacted] supplemental report (0.3); finalize reproduced text messages for production and confer with PB regarding same (0.3).	4.30	325.00	1,397.50
10/16/24	JH	Confer with MV regarding exhibit list (0.5); begin populating [redacted] exhibit list with bates-numbered [redacted] (1.9); prepare key pleadings from [redacted] for expert [redacted] review at HM request (0.3).	2.70	325.00	877.50
10/16/24	PB	Teleconference with [redacted], and BA regarding [redacted] (0.4); conferences with VO regarding deposition defense of [redacted] (1.4); preparation for defense of deposition of [redacted] and upcoming preparation sessions (5.0); prepare for and attend teleconference with T. Lewis regarding rebuttal report (1.1); conference [redacted] regarding discovery [redacted] (0.4); research regarding [redacted] motion (1.2); review and analyze miner expert report (0.7).	10.20	725.00	7,395.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/16/24	HM	Review documents in search of [redacted] to produce to Whinstone (4.5); finalize and serve correspondence from BA to M. Thomas regarding 30(b)(6) topics (0.2); [redacted] and serve corrected Tiffany Lewis expert report (0.3); review and respond to team correspondence regarding documents to send to experts and deposition logistics (2.2); perform fact research for BA about [redacted] and an energy use issue (2.0).	9.20	600.00	5,520.00
10/16/24	MV	Continue preparing exhibit list and exhibits for trial.	3.00	400.00	1,200.00
10/17/24	VO	Correspond with Quinn Emanuel regarding deposition scheduling.	.30	875.00	262.50
10/17/24	EB	Correspond with witnesses and Stris team regarding trial attendance (0.5); attend teleconference with [redacted] regarding same (0.2); begin preparing to depose Whinstone ERCOT expert S. Siddiqi (3.8); review and comment on draft expert rebuttal report of [redacted] regarding [redacted] and [redacted] issues (2.4); correspond with BA regarding same (0.1); correspond with BA and Stris team regarding high priority action items including potential discovery and Daubert motions (0.3).	7.30	1100.00	8,030.00
10/17/24	BA	Analyze and outline high priority discovery, trial preparation, and motion practice tasks and convey same to JS, EB, HM, and PB (0.8); prepare for (0.5), confer with JS regarding (0.3), participate in (1.0), and confer with JS to debrief (0.3) conferral conference with Whinstone's counsel regarding 30(b)(6) topics; correspond and confer with HM regarding preparation of designations and objections to 30(b)(6) topics (0.2); review, draft, correspond with JS and bankruptcy counsel regarding, and revise designations and objections to 30(b)(6) topics, and prepare draft email to opposing counsel regarding same (4.0); correspond with litigation team regarding production of underlying calculations for expert reports (0.3); review correspondence from opposing counsel regarding discovery matters, correspond and confer with PB and JS regarding responses to same, and review and edit response to same (0.6); correspond with litigation and bankruptcy team regarding hearing and trial planning (0.2); continue preparing to depose expert J. Matthews (0.8).	9.00	1050.00	9,450.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/17/24	JS	Prepare for [redacted] deposition (2.3); prepare to depose B. Gibson (4.0); evaluate power credit issues in connection with K. Haugen deposition (0.9); prepare for and attend meet and confer regarding 30b6 topics (1.8); confer with W. Thompson regarding deposition [redacted] and remaining Whinstone experts (0.9); calls with J. Cohn regarding 30b6 topic designations and objections (0.4); review and revise 30b6 topic designations and objections (2.0); confer with BA regarding 30b6 designations and objections (2.2); attend to high priority outstanding discovery matters (1.6).	16.10	875.00	14,087.50
10/17/24	CS	Continue drafting opposition to Whinstone's motion for partial summary judgment (9.7).	9.70	725.00	7,032.50
10/17/24	CHH	Compile documents for [redacted] review for deposition preparation and emails with JS regarding same (1.5); review and update matter docket (0.3); teleconference with PB and prepare supplemental text message and word native productions in light of same (0.2); prepare and email G. Gonzalez-Araiza (Lehotsky) with [redacted] (expert) [redacted] deposition preparation materials (0.1); review and edit trial exhibit list (1.8).	3.90	325.00	1,267.50
10/17/24	NC	No Charge - Research and circulate expert past transcripts; correspond with EB and MN regarding same.	2.00	325.00	N/C
10/17/24	JH	Continue populating exhibit list with Hot Docs identified by HM (4.3); update bankruptcy docket with CHH assistance (1.0).	5.30	325.00	1,722.50
10/17/24	PB	Correspondence with EB, BA, and JS regarding discovery status (0.9); correspondence with counsel for Whinstone regarding open discovery items and Whinstone discovery deficiencies (2.6); teleconference with T. Lewis regarding [redacted] (0.5); teleconference with [redacted] regarding [redacted] issues (0.3); prepare production of documents responsive to supplemental Whinstone requests (6.4); prepare for upcoming defense of deposition testimony of [redacted] (1.0)	11.40	725.00	8,265.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/17/24	HM	Begin drafting deposition outline of Benjamin Gibson (5.2); teleconference with JS about deposition preparation for [redacted] and [redacted] (1.5); finalize and serve deposition notices for Jeffrey G. Matthews and Shams Siddiqi (0.5); attend meet-and-confer with BA, JS, A. Swartz (LKC), M. Thomas and A. Howell (Foley) to discuss corporate representative topics (1.0); begin drafting objections and designations for Whinstone's corporate representative topics (2.0); meet with [redacted] to discuss [redacted] and deposition [redacted] (0.3); review and respond to team correspondence regarding court reporter services, deposition logistics, and deposition scheduling (2.5).	13.00	600.00	7,800.00
10/17/24	MV	Further review local rules and exhibit requirements and correspond with team regarding same (0.5); continue reviewing documents for inclusion on and preparing exhibit list (6.0).	6.50	400.00	2,600.00
10/18/24	VO	Participate in portion of deposition preparation session for [redacted] (2.5); debrief with PB and JS regarding same (0.5); prepare emails to [redacted] regarding deposition preparation (0.3); continue preparing for further [redacted] deposition preparation (1.4).	4.70	875.00	4,112.50
10/18/24	EB	Continue making initial proposed revisions to [redacted] (1.1); correspond with [redacted] regarding same and next steps (0.1); advise ASA regarding provision of additional documents to [redacted] and NC regarding citation checks for [redacted] (0.1); attend portion of teleconference with JS, M. Frederick, W. Thompson, A. Davis, and [redacted] regarding [redacted] issues (0.9); attend teleconference with [redacted] regarding revisions to [redacted] report (0.2); continue [redacted] same (4.7); review and respond to team correspondence regarding high priority action items including further production of documents in advance of upcoming depositions and expert reports (0.5).	7.60	1100.00	8,360.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/18/24	BA	Review draft rebuttal opinion from [redacted] and advise EB regarding revisions to same (1.0); review and revise 30(b)(6) objections and designations and correspond with litigation and bankruptcy teams regarding final revisions to same (1.5); review, revise, and draft opposition to Whinstone's motion for partial summary judgment and correspond with CS regarding same (2.8); confer with litigation and bankruptcy teams regarding trial preparation (0.9); correspond with JS, PB, and HM regarding trial support (0.1); advise VO, JS, and PB regarding discovery matters and deposition preparation for [redacted] (0.5); correspond with ASA and NC regarding deposition and trial planning and support (0.2).	7.00	1050.00	7,350.00
10/18/24	JS	Participate in portion of [redacted] deposition preparation (0.5); participate in portion of [redacted] deposition preparation (1.5); debrief with VO and PB (0.5); review and finalize objections and designations on 30b6 topics (0.4); attend call with [redacted] and LKC team regarding [redacted] programs (0.5); participate in [redacted] deposition preparation (2.4); advise HM regarding next steps in connection with same (0.2); attention to [redacted] deposition preparation (1.4); prepare to depose Gibson (4.0); research and evaluate potential privilege issues (0.4) and confer with PB regarding same (0.3).	12.10	875.00	10,587.50
10/18/24	CS	Continue drafting response to Whinstone's motion for partial summary judgment.	7.90	725.00	5,727.50
10/18/24	JH	Continue populating exhibit list with key documents used as exhibits in filed declarations.	4.70	325.00	1,527.50
10/18/24	PB	Prepare for and conduct deposition preparation session with [redacted] and VO (3.1); debrief with VO and JS regarding same (0.5); attention to discovery action items including review and analyze supplemental production of documents to Whinstone and advising HM regarding and producing same (5.5); analyze [redacted] issues at the request of JS (0.3); attend team teleconference regarding trial preparation (1.0); confer with BA, JS, and VO regarding issues for [redacted] deposition preparation (1.0).	11.40	725.00	8,265.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/18/24	ASA	Compile motion for summary judgment briefing for reference by expert [redacted] at request of EB (0.6); locate hosting service agreement document at request of co-counsel (0.6); coordinate with EB, HH, and team members to finalize rooming list for Houston trial (1.6); attend conference about trial logistics with litigation and bankruptcy teams (0.9).	3.70	325.00	1,202.50
10/18/24	HM	Assist PB in collecting, reviewing, and producing documents for production 16 (4.3); participate and assist JS with [redacted] deposition preparation (2.4); confer with Stris and LKC team members regarding trial planning (0.9); review and respond to team correspondence regarding deposition support (1.0); attention to scheduling of depositions of opposing experts (0.5).	9.10	600.00	5,460.00
10/18/24	MV	Attend teleconference with local vendor regarding trial preparation and support (0.5); continue preparing exhibit list and exhibits for trial (5.5).	6.00	400.00	2,400.00
10/19/24	VO	Continue to review and prepare outline for [redacted] deposition of [redacted], and review and analyze hot documents in connection with same (4.3); prepare email to [redacted] regarding 30(b)(6) topics and to provide update (0.1).	4.40	875.00	3,850.00
10/19/24	EB	Revise [redacted] (1.0); confer with BA, JS, and [redacted] regarding same (0.5); correspond with PB regarding [redacted] rebuttal report (0.2).	1.70	1100.00	1,870.00
10/19/24	BA	Review and [redacted] rebuttal report in consultation with [redacted] and EB (2.1); review draft rebuttal report from [redacted], convey [redacted] to PB, EB, and JS, correspond with PB regarding same, and convey same to [redacted] (1.4); correspond with CS and JS regarding summary judgment opposition and continue reviewing and revising same (1.0).	4.50	1050.00	4,725.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/19/24	JS	Work on Gibson [redacted] (5.7); work through [redacted] issues for [redacted] deposition with PB (1.7) and evaluate additional potential issues for [redacted] deposition (0.5); confer with W. Thompson regarding issue prioritization and trial planning (0.9); confer with J. Cohn regarding [redacted] issues and trial planning (0.4); confer with VO regarding depositions of [redacted], and [redacted] (0.5).	9.70	875.00	8,487.50
10/19/24	CS	Continue drafting response to Whinstone's motion for partial summary judgment.	4.30	725.00	3,117.50
10/19/24	PB	Review, analyze, and suggest revisions to draft expert report of T. Lewis (5.9); teleconference with J. Stokes regarding same (1.6).	7.50	725.00	5,437.50
10/19/24	HM	Draft deposition outline of Benjamin Gibson. (2.8).	2.80	600.00	1,680.00
10/20/24	EB	Confer with BA and [redacted] regarding [redacted] rebuttal report and continue [redacted] (1.9); correspond with BA, PB, and [redacted] regarding revisions to [redacted] rebuttal report (0.2); attend portion of teleconference with JS and LKC regarding upcoming Whinstone Rule 30(b)(6) deposition on power topics (1.1); correspond with M. Frederick regarding documents for potential use at same (0.3).	3.50	1100.00	3,850.00
10/20/24	BA	Confer with EB and [redacted] regarding rebuttal expert report (0.8); review and revise summary judgment opposition and correspond with CS regarding same (1.1); correspond with EB and JS regarding revisions to [redacted] rebuttal report (0.4); review discovery correspondence from Whinstone and correspond with team regarding same, including proposing response language (0.4); correspond with M. Frederick and team regarding Haugen deposition (0.2).	2.90	1050.00	3,045.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/20/24	JS	Prepare for deposition of B. Gibson (4.3); assist M. Frederick in preparation for deposition of K. Haugen (2.5); evaluate high priority discovery dispute and prepare plan regarding same (1.4); review and evaluate expert report of C. Griffey (0.9); evaluate contract interpretation arguments related to pricing terms (0.5); review materials in connection with preparation of [redacted] for deposition (1.1); correspond with BA regarding [redacted] report (0.2).	10.90	875.00	9,537.50
10/20/24	CS	Continue drafting response to Whinstone's motion for partial summary judgment.	6.90	725.00	5,002.50
10/20/24	PB	Propose revisions to [redacted] report of [redacted] (1.2); analyze draft report of [redacted] (.3); prepare to defend deposition of [redacted] (5.8).	7.30	725.00	5,292.50
10/21/24	VO	Attend portion of [redacted] deposition preparation session (2.7); debrief with PB regarding same and to discuss additional issues for next preparation session (0.4).	3.10	875.00	2,712.50
10/21/24	PS	Review and comment on opposition to MSJ (1.1); review and comment on expert rebuttal reports (0.8).	1.90	1250.00	2,375.00
10/21/24	EB	Further revise [redacted] including to reflect additional comments from BA, J. Cohn, and [redacted] (2.5); advise ASA regarding cite check and revisions to [redacted] exhibit and ASA and HM regarding finalization and service of same (0.5); assist BA and PB with further revisions to [redacted] regarding [redacted] report (0.7); correspond with BA and JS regarding high priority issues including potential further [redacted] document production (0.4); attend teleconference with BA, JS, VO, PB, [redacted]nson regarding same (0.5); attend portion of [redacted] deposition preparation session (1.1); review proposed final [redacted] rebuttal report and correspond with A. Swartz regarding [redacted] to same (0.9); continue preparing for Siddiqi deposition (2.2).	8.80	1100.00	9,680.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/21/24	BA	Convey and review additional research and confer with litigation and bankruptcy counsel and client regarding objection to Whinstone's demand for production of general ledgers and expansion of 30(b)(6) topics (1.6); correspond with HM regarding priority tasks including deposition outline for J. Matthews and Daubert research (0.1); review revised [redacted] report and correspond with A. Swartz regarding same (0.3); review revisions to [redacted] report and confer with EB regarding revisions and finalization of same (1.0); review draft [redacted] report and supporting [redacted] and confer with PB, EB, and A. Davis, and [redacted] regarding revisions to and finalization of same (3.0); continue reviewing and revising opposition to Whinstone's motion for summary judgment and correspond and confer with CS regarding same (2.9).	8.90	1050.00	9,345.00
10/21/24	JS	Revise Gibson deposition outline (5.7); review rebuttal report and add further questions to deposition outline (2.5); attend portion of prep session for [redacted] (1.5); attend [redacted] prep session (4.0); follow up with HM on outstanding [redacted] issues (0.7); prepare discovery correspondence regarding general ledgers and corporate designee issues (0.5).	14.80	875.00	12,950.00
10/21/24	CS	Continue revising opposition to Whinstone's motion for summary judgment (4.2); draft [redacted] declaration in support of opposition to motion for summary judgment and organize exhibits attached thereto (1.6); draft [redacted] declaration in support of opposition to motion for summary judgment and organize exhibits attached thereto (2.1).	7.90	725.00	5,727.50
10/21/24	CHH	Collect exhibit information in preparation for K. Haugen (Riot) deposition (0.1); review production correspondence and update production log accordingly (0.5).	.60	325.00	195.00
10/21/24	JH	Continue populating the internal exhibit list with MV assistance and direction.	6.00	325.00	1,950.00
10/21/24	PB	Teleconference with EB and BA regarding [redacted] report (0.5); meeting with [redacted] regarding deposition preparation (2.3); assist in [redacted] and finalization of [redacted] report of [redacted] (3.6); prepare for upcoming defense of deposition of [redacted] (5.5).	11.90	725.00	8,627.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/21/24	ASA	Proofread, cite-check, prepare list of documents considered, and attach related material before finalizing in support of [redacted] expert report.	6.60	325.00	2,145.00
10/21/24	HM	Review photos attached to messages for production (2.2); attend teleconference with [redacted], JS, and Gabriela Gonzales-Araiza (LKC) regarding deposition preparation (4.2); review and prepare documents and photos for deposition of Benjamin Gibson (2.4); review and revise Benjamin Gibson deposition outline (1.6); review and analyze notes from deposition preparation session to draft [redacted] for [redacted] deposition (1.4); coordinate with [redacted] for scheduling offensive expert depositions (0.5); review, finalize, and serve expert rebuttal reports of Tiffany Lewis, Charles Griffey, and Nenad Miljkovic (0.4); conduct research for W. Thompson about [redacted] (1.0); begin reviewing deposition transcript of Chad Harris (1.5).	14.50	600.00	8,700.00
10/21/24	MV	Continue revising exhibit list and reviewing documents for revisions to same.	6.00	400.00	2,400.00
10/22/24	VO	Attend portion of [redacted] deposition preparation session (2.2); debrief with PB regarding same (0.2); confer and correspondence with W. Thompson regarding same (0.2).	2.60	875.00	2,275.00
10/22/24	EB	Continue preparing to depose opposing expert S. Siddiqi (ERCOT) (3.9); begin preparing to depose Peters (miners) (1.1); review and correspond with PS, BA, and [redacted] regarding opposing rebuttal report of Whinstone experts S. Siddiqi and supplement of M. Matthews (0.6); confer with BA and Stris and LKC teams regarding [redacted] deposition preparation (0.2); attend teleconference with [redacted] regarding same and upcoming expert depositions (1.4); correspond with [redacted] regarding exhibit list (0.2); attention to revising, finalizing, and advising HM regarding service of [redacted] reports and accompanying [redacted] (1.8).	8.20	1100.00	9,020.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/22/24	BA	Review and analyze rebuttal reports from Whinstone (1.5); confer with EB and [redacted] regarding Whinstone rebuttal reports and deposition prep (0.8); continue reviewing, revising, and drafting opposition to Whinstone's motion for summary judgment, and correspond and confer with J. Cohn and CS regarding same (7.0); correspond with PB and T. Lewis regarding deposition preparation (0.2).	9.50	1050.00	9,975.00
10/22/24	JS	Prepare for and attend B Gibson deposition (7.6); review and revise MSJ opposition (3.1); work on [redacted] deposition defense prep (1.5); work on [redacted] deposition defense prep (0.4).	12.60	875.00	11,025.00
10/22/24	SR	Draft materials for [redacted] deposition preparation.	2.30	650.00	1,495.00
10/22/24	SB	Put together [redacted] of Whinstone's experts for EB (0.5); conduct westlaw searches for cases and opinions where experts [redacted] testimony was excluded (1.7); review dockets of cases where experts [redacted] testified and send same to EB (1.0).	3.20	325.00	1,040.00
10/22/24	CS	Continue revising opposition to Whinstone's motion for summary judgment (6.6); revise and finalize Nichols declaration in support of opposition to Whinstone's motion for summary judgment (1.1).	7.70	725.00	5,582.50
10/22/24	JH	Prepare cover sheets for exhibits to Debtor's Opposition to Whinstone's Partial Motion for Summary Judgment for CS (2.5); assist EB in proofreading expert [redacted] for Opening and Rebuttal reports (3.0); update bankruptcy docket (0.3); update MV running exhibit list with ECF numbers of those exhibits filed in bankruptcy court (2.0).	7.80	325.00	2,535.00
10/22/24	PB	Teleconferences with [redacted], JS, JC, and WT regarding deposition preparation and follow-up calls with WT and JS regarding same (7.4); teleconference with EB regarding expert depositions (0.2); prepare for upcoming defense of deposition of [redacted] (1.2); teleconference with J. Stokes regarding privilege issues (0.3); review deposition transcript of C. Harris for trial preparation (0.3).	9.40	725.00	6,815.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/22/24	HM	Attend deposition of Benjamin Gibson (5.5); conduct research on exclusion of Gibson's expert report given lack of compliance with FRCP 26(a)(2)(B)(v) and send to JS (1.0); attend teleconference with [redacted] and JS regarding deposition preparation (0.5); finalize and serve corrected reports of Charles Griffey (0.3); review and respond to team correspondence regarding deposition logistics and document discovery (0.8); continue reading deposition transcript of Chad Harris (0.5).	8.60	600.00	5,160.00
10/22/24	MV	Continue preparing and assisting PB with preparation of exhibit list and exhibits for trial.	7.00	400.00	2,800.00
10/23/24	EB	Correspond with J. Cohn regarding deposition preparation questions for [redacted] (0.3); continue preparing to depose S. Siddiqi (ERCOT) expert (5.8); correspond with MV regarding exhibit list and related action items (0.2).	6.30	1100.00	6,930.00
10/23/24	BA	Review additional edits on draft opposition to summary judgment motion from J. Cohn, W. Thompson, and JS, continue revising same, correspond with J. Cohn and with JS regarding edits to same, correspond with SB regarding cite check, correspond and confer with [redacted] regarding same, and correspond and confer with CS as needed on all issues regarding finalizing same, including final edits, cite check, exhibits, sealing, and redactions (4.5); review correspondence and related discovery motion from Whinstone, and correspond with K. Hutchins regarding same (0.4); confer with PB regarding same (0.2); confer with J. Cohn and PB regarding strategy for response (0.2); research and draft opposition to Whinstone's motion to compel and convey same to team for review, corresponding as necessary with K. Hutchins and PB regarding same (4.5); confer with JS regarding high priority action items including discovery motions (0.2); correspond and confer with EB, HM, PB, JS and A. Swartz regarding redactions issues related to power spreadsheets, as relevant to deposition preparation and expert disclosures (1).	11.00	1050.00	11,550.00
10/23/24	JS	Attend deposition of E. Brown (7.5); review and revise discovery motion and opposition (3.3); evaluate trial strategy and further deposition strategy in light of depositions so far (2.2).	13.00	875.00	11,375.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/23/24	SR	Attend teleconference with JS regarding [redacted] deposition preparations (0.1); correspond with HM regarding the same (0.1).	.20	650.00	130.00
10/23/24	SB	Cite Opposition to Whinstone's Partial Summary Judgment for CS (4.4); create calendar invites for expert deposition preparation for EB (0.2).	4.60	325.00	1,495.00
10/23/24	CS	Review and revise opposition to Whinstone's motion for summary judgment (7.1); review cite check of the same (0.4); finalize exhibits and declarations for filing (0.7); file opposition and supporting materials (0.8).	9.00	725.00	6,525.00
10/23/24	JH	Cite-check Debtors' Opposition to Whinstone's Motion for Partial Summary Judgment with SB at CS request (5.0); update bankruptcy docket (0.5); begin tagging [redacted] deposition exhibits to compare with those on MV running exhibit list (1.0).	6.50	325.00	2,112.50
10/23/24	PB	Teleconference with JS regarding response to discovery motion (0.2); teleconference with BA regarding response to discovery motion (0.3); teleconference with JS and BA regarding strategy for discovery motion response (0.1); draft motion to compel interrogatory responses (6.4); analyze deposition transcript of C. Harris for trial preparation (0.4); analyze rebuttal report of J. Matthews (1.2).	8.60	725.00	6,235.00
10/23/24	HM	Attend deposition of Dr. Eric Brown (5.5); confer with JS about deposition of Dr. Eric Brown (0.5); draft [redacted] of depositions of Eric Brown and Benjamin Gibson and circulate to [redacted] (0.5); finalize and serve letter from Debtors to Foley regarding confidentiality designations of Chad Harris's October 16, 2024 deposition (0.3); review and respond to team correspondence regarding trial exhibits and deposition logistics (1.2).	8.00	600.00	4,800.00
10/23/24	MV	Correspond with attorneys regarding trial logistics and action items and coordinate trial assignments with fellows (0.5); correspond with co-counsel regarding depositions and exhibits and update internal deposition log (0.5); prepare for teleconference with Quinn Emanuel paralegal regarding court requirements and exhibit list (1.0); further revise exhibit list and trial exhibits (6.0).	8.00	400.00	3,200.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/24/24	VO	Prepare for (1.0) and attend (4.5) deposition preparation session for [redacted]; attend portion of deposition preparation session for [redacted] (2.5).	8.00	875.00	7,000.00
10/24/24	EB	Continue preparing for (1.6) and conduct (5.8) deposition of Whinstone expert S. Siddiqi (ERCOT); summarize same for [redacted] (0.6); continue preparing to depose Whinstone expert R. Peters (miners) (0.7); correspond with J. Cohn regarding information for preparation of Rhodium expert [redacted] (0.2); correspond with opposing counsel to reiterate request for production of documents in unredacted form (0.5).	9.40	1100.00	10,340.00
10/24/24	BA	Correspond with HM, JS, PB, and EB and confer with EB regarding issues with Whinstone redactions on power spreadsheets, relevance to pending expert depositions, and potential response to opposing counsel regarding same (0.8); confer with JS regarding high priority action items including discovery motions, deposition prep and depositions (0.2); participate in teleconference with litigation team regarding preparation for [redacted] deposition and other action items including pending motions (0.5); participate in teleconference with client team, bankruptcy counsel, and [redacted] counsel for [redacted] (0.5); review, research, draft, revise, and supervise finalization of opposition to Whinstone's motion to compel and Debtors' motion to compel, including corresponding and conferring with bankruptcy counsel as needed regarding same, with HM and CS regarding finalization and filing of same, and with JH and SD regarding exhibit preparation for same (8.3); review and approve for service amended interrogatory response (0.2).	10.50	1050.00	11,025.00
10/24/24	JS	Attend update teleconference with client and attorney teams (1.0); attend preparation session for [redacted] deposition (2.0); advise PB regarding action items in support of same (0.5); prepare supplemental response to interrogatory No. 4 (0.9); continue preparing materials for [redacted] deposition preparation (1.5); attend preparation session for same (3.1); review M. Moore correspondence regarding scope of proceedings and evaluate same (0.9); prepare for discovery hearing (2.9).	12.80	875.00	11,200.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/24/24	SR	Attend teleconference with HM to discuss [redacted] deposition preparations.	.10	650.00	65.00
10/24/24	SB	No Charge - Attend Logickull training with Sophia Ho.	.70	325.00	N/C
10/24/24	CS	Finalize and file motion to compel (0.5); continue working on trial brief (0.2); review preliminary opposition to motion to assume (0.5).	1.20	725.00	870.00
10/24/24	CHH	Redline Whinstone's verified and original interrogatory responses and email PB with findings (0.3); collect and review trial exhibits (1.9).	2.20	325.00	715.00
10/24/24	JH	Prepare exhibits for the Motion to Compel Production and the Opposition to Whinstone's Motion for Partial Summary Judgment for BA.	.50	325.00	162.50
10/24/24	PB	Prepare for deposition preparation session with [redacted] (3.0); [redacted] teleconference with BA, JS, JC, WT, and VO regarding defense of deposition of [redacted] (0.5); attend deposition preparation session with [redacted] (4.8); follow-up teleconference with [redacted] regarding [redacted] issue (0.5).	8.80	725.00	6,380.00
10/24/24	HM	Review and analyze documents produced by Whinstone regarding discovery disputes and motion to compel (4.5); review, revise, and finalize motion to compel (1.0); review, revise, and finalize proposed order for hearing and order to compel (0.2); draft, finalize, and serve supplemental response to Whinstone's interrogatory 4 (1.2); review and respond to team correspondence regarding discovery disputes and upcoming hearing (1.0); finalize exhibits to motion to compel (0.2).	8.10	600.00	4,860.00
10/24/24	MV	Assist attorneys with documents for depositions (0.5); continue reviewing documents for inclusion and revising exhibit list (7.0).	7.50	400.00	3,000.00
10/25/24	VO	Attend hearing before bankruptcy judge (0.5); prepare for (1.5) and defend (5.0) A. Peloubet deposition; debrief with team regarding same (0.5).	7.50	875.00	6,562.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/25/24	EB	Review and respond to further correspondence from opposing counsel regarding production of unredacted documents (0.2); prepare materials for J. Cohn regarding [redacted] deposition preparation (1.0); correspond with J. Cohn regarding same (0.1); continue preparing to depose Whinstone expert R. Peters (miner expert) (4.6); attend teleconference with J. Cohn and [redacted] regarding deposition preparation (1.5); attend further teleconference with [redacted] regarding information for [redacted] portion of Whinstone expert Matthews deposition (0.8).	8.20	1100.00	9,020.00
10/25/24	BA	Prepare for and attend status conference (1.0); confer with JS, J. Cohn, and P. Tomasco regarding outcome of same and potential bifurcation (0.5); analyze issues and proposed correspondence to opposing counsel regarding same (0.2); confer with JS regarding same (0.3); confer with EB regarding deposition preparation for upcoming experts (0.4); review materials and prepare for Matthews deposition including corresponding with JS and HM (4.4); confer with PB to prepare for depositions of [redacted] and Matthews (0.9); advise HM regarding redactions of power spreadsheets (0.3).	8.00	1050.00	8,400.00
10/25/24	JS	Prepare for [redacted] deposition (5.4); virtually attend portions of depositions of A Peloubet and J McGonegal (3.2); confer with BA regarding [redacted] for deposition of J Matthews (0.8); prepare for and attend hearing on discovery issues (1.5); confer with team and prepare follow up correspondence regarding bifurcation (0.9); evaluate potential witness strategies in light of possible bifurcation (0.3); confer with QE team regarding [redacted] deposition (0.5); review transcript of Haugen deposition (0.6).	13.40	875.00	11,725.00
10/25/24	SR	Prepare for (3.3) and lead (1.4) deposition preparation session with [redacted], A. Swartz, and HM.	4.70	650.00	3,055.00
10/25/24	CS	Begin drafting reply in support of motion to assume (6.2); listen to hearing on emergency discovery motion (.5).	6.70	725.00	4,857.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/25/24	CHH	Review and update matter docket with latest opposition to motion for partial summary judgment filings and compile same for client review (0.5); review and collect documents in preparation for expert depositions (0.2); review and collect deposition notices in preparation for trial exhibit collection (0.3); review J. Matthews (expert)'s opening and rebuttal reports and collect all documents referenced in same for BA review in preparation for depositions (2.5); continue collecting trial exhibits (2.0).	5.50	325.00	1,787.50
10/25/24	JH	Continue updating running exhibit list.	5.80	325.00	1,885.00
10/25/24	PB	Attend hearing (0.5); prepare for deposition defense of [redacted] (1.6); defend deposition of A. Peloubet (4.8); confer with BA regarding [redacted] and Matthews depositions (0.9).	7.80	725.00	5,655.00
10/25/24	ASA	Record documents recently sent to expert C. Griffey (0.2); update [redacted] memorandum [redacted] exchanged expert reports (0.5).	.70	325.00	227.50
10/25/24	HM	Attend hearing (0.5); attend teleconference deposition preparation session of [redacted] with SR and A. Swartz (2.3); review and respond to team correspondence regarding document discovery disputes and deposition matters (2.0); review and revise [redacted] deposition preparation materials (1.5); coordinate deposition logistics with vendors and co-counsel (1.1); coordinate with AA and CH about [redacted] exhibits for Jeffrey Matthews deposition (0.4); collect spreadsheets produced by Whinstone [redacted] for deposition of Jeffrey Matthews (1.2); confer with A. Swartz via phone regarding depositions of Benjamin Gibson and Eric Brown (0.3); attention to deposition scheduling and related action items (0.5); attention to document management (0.1).	9.50	600.00	5,700.00
10/25/24	MV	Continue revising exhibit list including to reflect updated expert witness materials (5.5); correspond with team regarding exhibit list descriptions and additional trial assignments (0.5).	6.00	400.00	2,400.00
10/26/24	VO	Attend deposition preparation session for [redacted].	5.80	875.00	5,075.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/26/24	EB	Correspond with MV regarding exhibit list (0.2); correspond with JS regarding questions for [redacted] and review and analyze responses to same (0.2).	.40	1100.00	440.00
10/26/24	BA	Prepare for Matthews expert deposition, including corresponding with HM and PB regarding exhibits and deposition outline (4.5).	4.50	1050.00	4,725.00
10/26/24	JS	Prepare for deposition of [redacted].	9.70	875.00	8,487.50
10/26/24	PB	Prepare for defense of deposition of [redacted]	2.50	725.00	1,812.50
10/26/24	HM	Review, analyze, collect, and organize documents for deposition of Jeffrey Matthews (2.8); continue reviewing report of Jeffrey Matthews (1.0).	3.80	600.00	2,280.00
10/26/24	MV	Continue reviewing documents for inclusion and revising exhibit list, preparing exhibits for trial.	5.00	400.00	2,000.00
10/27/24	VO	Continue to conduct deposition preparation with JS and [redacted].	5.50	875.00	4,812.50
10/27/24	EB	Continue preparing to depose Whinstone expert R. Peters (3.5); continue preparing to defend Rhodium expert C. Griffey (3.9); confer with JS, VO, PB, and [redacted] regarding proposed bifurcation (0.2); correspond with MV and litigation fellows regarding exhibit list and deposition calendering (0.3); attend portion of [redacted] deposition preparation (0.2).	8.10	1100.00	8,910.00
10/27/24	BA	Prepare for [redacted] expert deposition (0.7); prepare for Matthews expert deposition (4.2); correspond and confer with JS regarding preparation for upcoming status conference and discovery hearing, including positions on discovery issues, and review omnibus filing from Whinstone regarding same (1.1).	6.00	1050.00	6,300.00
10/27/24	JS	Prepare for [redacted] deposition (6.3); prepare for and attend meet and confer regarding bifurcation and discovery disputes (2.3); prepare for discovery hearing (1.5); confer with client and attorney teams regarding bifurcation (0.8).	10.90	875.00	9,537.50
10/27/24	CS	Continue drafting reply in support of motion to assume.	2.70	725.00	1,957.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/27/24	PB	Assist JS with meet-and-confer regarding discovery status and case schedule (1.0); assist in preparation of defense of deposition of [redacted] (3.7); prepare for deposition of J. Matthews (0.8).	5.50	725.00	3,987.50
10/27/24	HM	Continue reviewing Jeffrey Matthews's expert report (0.5); update list of proposed deposition exhibits (1.0); review and analyze list of documents listed in Matthews expert report and continue drafting annotated list for BA (4.2); review transcript of Eric Brown deposition and draft errata sheet (2.5).	8.20	600.00	4,920.00
10/27/24	MV	Correspond with team regarding trial-related action items including revisions to trial exhibit descriptions (1.8); continue assisting with documents for deposition preparation (2.0); continue revising exhibit list and preparing exhibits for trial (2.2).	6.00	400.00	2,400.00
10/28/24	VO	Participate in deposition of N. Nichols.	10.50	875.00	9,187.50
10/28/24	EB	Assist BA and PB with portion of Rhodium expert [redacted] deposition preparation (3.8); prepare power credits exhibit for [redacted] expert (0.5); prepare for and assist J. Cohn and A. Swartz with [redacted] of Rhodium [redacted] expert N. Milkjovic (3.5); review and respond to team correspondence regarding issues including exhibit list and action items resulting from bifurcation and discovery hearing (0.4).	8.20	1100.00	9,020.00
10/28/24	BA	Attend status conference by remote teleconference (1.2); prepare for deposition of [redacted], including reviewing preparation [redacted] and meeting with [redacted], EB, and PB and conferring with PB (6); prepare for deposition of J. Matthews, including continuing to prepare deposition outline and corresponding with HM and PB regarding deposition topics, outline, and exhibits (2); correspond with team regarding matters related to status conference, bifurcation, and depositions (0.3); begin reviewing reply in support of motion to assume and correspond with CS regarding reply memorandum and trial brief (0.6).	10.10	1050.00	10,605.00
10/28/24	JS	Prepare for and attend N Nichols deposition (11.4); attend hearing on discovery issues (1.0); evaluate next steps on remaining depositions and implications of bifurcation (1.0).	13.40	875.00	11,725.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/28/24	SR	Continue preparing for [redacted] deposition preparation session.	2.90	650.00	1,885.00
10/28/24	SB	Assist MV with revisions to trial and deposition exhibit list (4.1); pull documents for MV for exhibits folder (0.4).	4.50	325.00	1,462.50
10/28/24	CS	Analyze hearing on motions to compel and bifurcation of trial and continue drafting trial brief (1.0); continue drafting reply in support of motion to assume (3.7); review and analyze case law relevant to the same (4.1).	8.80	725.00	6,380.00
10/28/24	CHH	Review deposition transcripts and collect documents referenced in same for trial exhibit purposes.	2.30	325.00	747.50
10/28/24	JH	Update final exhibit titles for exhibits in running exhibit list (2.0); Begin creating exhibit covers [redacted] (2.5).	4.50	325.00	1,462.50
10/28/24	PB	Assist BA with preparation for deposition of J. Matthews (2.0); attend hearing on discovery motions (1.0); confer with BA, EB, [redacted], and [redacted] regarding defense of deposition of [redacted] (6.5); attend teleconference with A. Davis regarding [redacted] deposition preparation (0.5).	10.00	725.00	7,250.00
10/28/24	ASA	Update contact list and running matter status memorandum (0.4); assist with trial exhibit list preparation (0.8).	1.20	325.00	390.00
10/28/24	HM	Attend emergency motion teleconference before Judge Perez (1.0); continue reviewing and analyzing documents to create an annotated list of documents for the Jeffrey Matthews [redacted] (3.7); draft portion of Jeffrey Matthews deposition outline (3.2); review and respond to team correspondence regarding the trial exhibit list and deposition logistics (1.3).	9.20	600.00	5,520.00
10/28/24	MV	Correspond with legal assistants regarding outstanding trial assignments regarding exhibit list and related tasks (0.5); continue revising exhibit list and preparing exhibits for trial (6.5).	7.00	400.00	2,800.00
10/29/24	VO	Prepare for (2.2) and attend (4.0) deposition preparation session for [redacted].	6.20	875.00	5,425.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/29/24	EB	Prepare portion of Whinstone damages expert deposition outline for BA (3.3); review rough transcript of T. Lewis deposition and confer with BA and PB regarding same (1.0); review and respond to correspondence regarding order on motion to compel and resulting document production (0.2); advise HM and ASA regarding updates to trial travel and housing arrangements resulting from bifurcation order (0.1); correspond with HM and ASA regarding response to request for documents from bankruptcy counsel (0.1); advise MV regarding updates and revisions to exhibit list and potential sealing of portions of same (0.6).	5.30	1100.00	5,830.00
10/29/24	BA	Prepare for deposition of J. Matthews, including [redacted] and conferring with PB and JS (4.4); prepare for and attend deposition of T. Lewis (5); confer with [redacted] to prepare for Matthews deposition (0.8); participate in client call with litigation counsel and bankruptcy counsel (0.8); correspond with team and CS regarding sealing issues as related to exhibit list and regarding late productions from Whinstone and possible responses to same (0.4).	11.40	1050.00	11,970.00
10/29/24	JS	Assist with [redacted] prep (2.6); assist with [redacted] prep (1.5); assist with [redacted] prep (2.0); evaluate arguments regarding profit share calculations (8.3).	14.40	875.00	12,600.00
10/29/24	SR	Prepare for (2.5) and lead (4.4) deposition preparation session for [redacted] with VO.	6.80	650.00	4,420.00
10/29/24	SB	Assist MV with revisions to trial and deposition exhibit list (4.1); update exhibits folder (0.4).	4.50	325.00	1,462.50
10/29/24	CS	Continue drafting trial brief (5.4); correspond with MV regarding identifying and sealing certain trial exhibits (0.3).	5.70	725.00	4,132.50
10/29/24	CHH	Prepare trial exhibits, and review and analyze deposition transcripts for same.	4.00	325.00	1,300.00
10/29/24	JH	Continue creating exhibit covers [redacted].	3.00	325.00	975.00
10/29/24	PB	Prepare for deposition of T. Lewis (1.0); defend deposition of T. Lewis (4.3); prepare for deposition of J. Matthews (4.9).	10.20	725.00	7,395.00
10/29/24	ASA	Attention to trial and accommodation logistics (0.9); assist with trial exhibit list preparation (1.6).	2.50	325.00	812.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/29/24	HM	Revise deposition [redacted] of [redacted] (2.2); organize proposed Matthews deposition exhibits for printing and update corresponding tab index (1.4); begin reviewing deposition [redacted] of [redacted] (1.6); review and respond to team correspondence regarding document discovery and upcoming depositions (2.1).	7.30	600.00	4,380.00
10/29/24	MV	Continue preparing exhibit list and exhibits (6.1); attention to preparation for filing of sealed exhibits and qc for related issues (0.9).	7.00	400.00	2,800.00
10/30/24	VO	Defend deposition of B. Cottrell.	5.50	875.00	4,812.50
10/30/24	PS	Review Whinstone reply in support of MSJ.	.40	1250.00	500.00
10/30/24	EB	Attend teleconference with CS, HM, MV, and CHH regarding updates and revisions to exhibit list (1.1); review draft list and identify additional exhibits for phase 2 only (1.0); confer with BA and A. Swartz regarding expert deposition updates and review portions of rough transcripts of same (0.5).	2.60	1100.00	2,860.00
10/30/24	BA	Prepare for deposition of J. Matthews (2.6); attend and take same (7.2); confer with EB regarding Matthews deposition (0.2); confer with JS and PB regarding trial preparation (0.5); correspond with JS and PB regarding pretrial motion filings and with JS regarding strategy for high priority action items (0.5); review and revise reply in support of motion to assume (0.9).	11.90	1050.00	12,495.00
10/30/24	JS	Attend portions of B Cottrell deposition (2.5); attend teleconference with BA and PB regarding trial preparation (0.5); work on trial presentation (6.7); evaluate next steps for briefing and trial preparation in light of end of depositions (1.3); review trial brief (0.7) and reply in support of motion to assume (0.6); review Whinstone summary judgment briefing (1.0) and evaluate responses to same (1.2).	14.50	875.00	12,687.50
10/30/24	SR	Attend and assist VO with B. Cottrell deposition.	5.60	650.00	3,640.00
10/30/24	SB	Assist MV with updates to trial and deposition exhibit list (3.7); attend and assist VO and SR with exhibits for B. Cottrell deposition (0.9).	4.60	325.00	1,495.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/30/24	CS	Review and analyze Whinstone's reply in support of motion for partial summary judgment (0.8); attend teleconference with EB, HM, MV, and CHH regarding updates and revisions to exhibit list (1.1); continue drafting trial brief (4.1); review and analyze transcript of hearing on motion to [redacted] in [redacted] (1.5).	7.50	725.00	5,437.50
10/30/24	CHH	Review and analyze general ledger documents for production (0.5); finalize production for same and confer with PB accordingly (0.3); attend teleconference with EB, CS, HM, and MV regarding trial exhibit collection and preparation (1.1).	1.90	325.00	617.50
10/30/24	JH	Assist MV with confidentiality updates and sealing designations for exhibit list (3.0); prepare documents for HM to send to client (0.5).	3.50	325.00	1,137.50
10/30/24	PB	Prepare for deposition of J. Matthews (1.2); attend and assist BA with same (6.4); attend teleconference with BA and JS regarding trial preparation (0.5).	8.10	725.00	5,872.50
10/30/24	ASA	Assist with trial exhibit list preparation (1.8); attention to document management including of supplemental discovery responses (0.5).	2.30	325.00	747.50
10/30/24	HM	Attend teleconference with EB, CS, MV, and CHH to discuss revisions and updates to the exhibit list (1.1); review and respond to team correspondence regarding discovery responses (0.5); review, analyze, and collect documents for exhibit list and client review (5.5); attend meet-and-confer with opposing counsel (0.3); review and respond to client inquiry regarding discovery (0.4).	8.00	600.00	4,800.00
10/30/24	MV	Attend team teleconference regarding exhibit list (1.1); continue preparing and updating same and exhibits in preparation for trial (6.9).	8.00	400.00	3,200.00
10/31/24	EB	Review correspondence from Fulcrum and correspond with BA and JS regarding trial graphics (0.2); advise PB and correspond with Stris team regarding exhibit list revisions (0.5); correspond with PB, HM, and A. Swartz regarding Siddiqi deposition confidentiality designations (0.1).	.80	1100.00	880.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/31/24	BA	Continue reviewing and revising draft reply brief in support of motion to assume and confer JS and CS regarding same (2.5); correspond with litigation team regarding exhibit list and motion practice (0.2).	2.70	1050.00	2,835.00
10/31/24	JS	Prepare for and confer with BA and CS regarding trial brief, reply in support of assumption, and reply in support of MSJ (1.3); attend teleconference with opposing counsel regarding scheduling of phase 2 (0.4); attend teleconference with SMLLP and LKC teams and [redacted] regarding [redacted] questions (1.0); confer with W. Thompson (0.5) and PB (0.3) regarding motions in limine; draft outlines of same (0.6); begin outlining opening (2.0); review and revise Daubert motion regarding Gibson (1.4).	7.50	875.00	6,562.50
10/31/24	SB	Assist MV with updates to trial exhibit list.	5.10	325.00	1,657.50
10/31/24	CS	Continue drafting trial brief and confer with JS and BA regarding same and reply in support of moton to assume (4.3); review and analyze Whinstone's opposition to Debtors' motion for partial summary judgment (0.8).	5.10	725.00	3,697.50
10/31/24	CHH	Continue assisting PB and MV with updates and revisions to trial exhibit list and reviewing and analyzing deposition transcripts for same.	4.50	325.00	1,462.50
10/31/24	JH	Assist PB and MV with exhibit list including confidentiality assessment and replacement of slip-sheets of email attachments with native versions.	3.00	325.00	975.00
10/31/24	PB	Analyze Whinstone claims regarding unpaid invoices (1.0); attend teleconference with Stris and LKC teams and [redacted] regarding [redacted] documentation and [redacted] questions (1.0); attend teleconference with A. Swartz regarding Miljkovic deposition exhibits (0.2); continue preparing trial exhibit list, advising MV regarding revisions, and analyzing documents for inclusion on same (4.2).	6.40	725.00	4,640.00
10/31/24	ASA	Assist MV and CHH with trial exhibit preparation (1.7); correspond with Stris and LKC teams and vendors regarding deposition and trial support logistics (0.4).	2.10	325.00	682.50

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Invoice # 14269 November 14, 2024

Date	Tkpr	Description	Hours	Rate	Amount
10/31/24	HM	Review and analyze documents reviewed by experts to be included on exhibit list (2.9); review and respond to team correspondence regarding contention interrogatories and post-deposition tasks (1.3); attend meet-and-confer with P. Tomasco (Quinn), and opposing counsel (0.3); review and analyze deposition transcripts of E. Brown and B. Gibson for confidentiality designations and draft correspondence regarding designations (3.5); begin reviewing and analyzing deposition transcript of N. Nichols for confidentiality designations (1.1).	9.10	600.00	5,460.00
10/31/24	MV	Continue preparing and revising trial exhibits and exhibit list in preparation for trial.	7.00	400.00	2,800.00
		TOTAL PROFESSIONAL SERVICES			**$ 1,515,785.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	19.90	1,250.00	24,875.00
Elizabeth Brannen	EB	Partner	179.40	1,100.00	197,340.00
Bridget Asay	BA	Partner	219.00	1,050.00	229,950.00
Victor O'Connell	VO	Partner	95.40	875.00	83,475.00
John Stokes	JS	Partner	355.20	875.00	310,800.00
Colleen Smith	CS	Associate	177.30	725.00	128,542.50
Peter Brody	PB	Associate	267.30	725.00	193,792.50
Sarah Rahimi	SR	Associate	68.60	650.00	44,590.00
Helen Marsh	HM	Associate	240.70	600.00	144,420.00
Tanya Tice	TT	Discovery Associate	43.50	480.00	20,880.00
Monica Viramontes	MV	Sr Paralegal	146.50	400.00	58,600.00
Andrew Atsalis	ASA	Fellow	62.20	325.00	20,215.00
Cynthia Huang	CHH	Fellow	57.00	325.00	18,525.00
Shayra Banta	SB	Fellow	37.70	325.00	12,252.50
Jaida Hodge-Adams	JH	Fellow	84.70	325.00	27,527.50
Total			**2,054.40**		**$ 1,515,785.00**

Invoice # 14269 November 14, 2024

EXPENSES ADVANCED

Date	Task	Description	Amount
10/01/24		Logikcull Discovery Solutions (October 2024).	2,646.00
10/08/24		SETEC Investigations - Mounted Acquistion of 3 cell phones to preform keyword searches.	3,599.00
10/09/24		Fulcrum Legal Graphics - Retainer for trial support Graphics support.	15,000.00
10/18/24		StoneTurn - September 2024 services.	47,600.00
10/24/24		E. Brown invoice for deposition prep, deposition attendance and retainer for trial.	48,056.25
		TOTAL EXPENSES ADVANCED	**$ 116,901.25**
		TOTAL THIS INVOICE	**$ 1,632,686.25**

Stris & Maher LLP

Invoice # 14269 November 14, 2024

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14249	11/01/24	79,868.00	.00	79,868.00
14263	11/04/24	1,139,238.00	.00	1,139,238.00

Previous Balance	$ 1,219,106.00
Balance Due This Invoice	$ 1,632,686.25
TOTAL BALANCE DUE	**$ 2,851,792.25**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
1,219,106.00	$ .00	$ .00	$ .00	$$.00	1,219,106.00

Stris

November 8, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14284
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through October 31, 2024

RE: Retention and Fee Applications

Total Professional Services	$ 12,985.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 12,985.00**
Previous Balance	$ 47,165.00
TOTAL BALANCE DUE	**$ 60,150.00**

Electronic Invoice

Invoice # 14284 November 8, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
10/17/24	VO	Correspond with Quinn Emanuel regarding fee application process (0.1); begin preparing same (0.8); advise CH regarding instructions on preparation of portion of fee application (0.5).	1.40	875.00	1,225.00
10/17/24	PS	Confer with VO regarding fee application process and next steps.	.40	1250.00	500.00
10/17/24	CHH	Confer with VO regarding preparation of fee application (0.5); begin preparing portion of same (0.3).	.80	325.00	260.00
10/18/24	CHH	Continue drafting fee application.	6.50	325.00	2,112.50
10/21/24	VO	Confer with EB, CH, and Quinn Emanual regarding best-practices for and preparation of fee application.	.40	875.00	350.00
10/21/24	CHH	Continue drafting portion of monthly fee statement (2.6); confer with VO regarding same (0.2).	2.80	325.00	910.00
10/22/24	VO	Continue preparing portion of and advise EB and J. Richards regarding fee application.	.40	875.00	350.00
10/22/24	EB	Begin preparing portions of monthly fee application.	1.60	1100.00	1,760.00
10/23/24	EB	Continue preparing portions of monthly fee application (1.0); confer with PS, VO, and B. Howell (QE) regarding same (0.5).	1.50	1100.00	1,650.00
10/24/24	EB	Advise NC regarding preparation of portions of monthly fee statement.	.20	1100.00	220.00
10/24/24	NC	Assist EB with preparation of portion of monthly fee statement.	2.10	325.00	682.50
10/25/24	EB	Continue preparing portions of monthly fee statement.	.50	1100.00	550.00
10/30/24	EB	Prepare portion of August fee statement.	1.70	1100.00	1,870.00
10/31/24	EB	Advise NC regarding preparation of portion of August fee statement.	.20	1100.00	220.00
10/31/24	NC	Assist EB with preparation of portion of August fee statement.	1.00	325.00	325.00

TOTAL PROFESSIONAL SERVICES **$ 12,985.00**

Stris & Maher LLP

Invoice # 14284 November 8, 2024

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	.40	1,250.00	500.00
Elizabeth Brannen	EB	Partner	5.70	1,100.00	6,270.00
Victor O'Connell	VO	Partner	2.20	875.00	1,925.00
Cynthia Huang	CHH	Fellow	10.10	325.00	3,282.50
Nicholas Capalbo	NC	Fellow	3.10	325.00	1,007.50
Total			**21.50**		**$ 12,985.00**

TOTAL THIS INVOICE **$ 12,985.00**

Stris & Maher LLP

Invoice # 14284 November 8, 2024

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14261	11/04/24	47,165.00	.00	47,165.00

Previous Balance	$ 47,165.00
Balance Due This Invoice	$ 12,985.00
TOTAL BALANCE DUE	**$ 60,150.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 47,165.00	$ .00	$ .00	$ .00	$ .00	$ 47,165.00

Stris

November 14, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14295
Client # 00346
Matter # 008

INVOICE SUMMARY

For professional services rendered through October 31, 2024

RE: Non-working Travel for Whinstone Dispute

Total Professional Services	$ 68,292.50
50% discount	$ -34,146.25
Net Professional Services	$ 34,146.25
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 34,146.25**

Invoice # 14295 November 14, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
10/23/24	VO	Travel LAX-DAL for deposition of A. Peloubet.	6.50	875.00	5,687.50
10/23/24	PB	Travel to Dallas to defend deposition of A. Peloubet.	2.70	725.00	1,957.50
10/25/24	PB	Travel to Los Angeles from Dallas deposition of A. Peloubet.	5.30	725.00	3,842.50
10/26/24	VO	Travel DAL-HOU for N. Nichols deposition prep and deposition.	4.50	875.00	3,937.50
10/27/24	EB	Travel to Houston for expert depositions.	4.00	1100.00	4,400.00
10/27/24	BA	Travel from Montpelier, VT to Houston, TX .	4.00	1050.00	4,200.00
10/27/24	JS	Travel to Houston for N. Nichols deposition.	2.50	875.00	2,187.50
10/27/24	PB	Travel to Houston for deposition of T. Lewis.	7.60	725.00	5,510.00
10/28/24	JS	Travel home from Houston following N. Nichols deposition.	4.50	875.00	3,937.50
10/28/24	SR	Travel from Los Angeles to Austin for B. Cottrell deposition.	6.20	650.00	4,030.00
10/29/24	EB	Return travel from Houston for expert depositions.	2.20	1100.00	2,420.00
10/29/24	BA	Travel from Houston to Dallas for Matthews deposition.	2.80	1050.00	2,940.00
10/29/24	VO	Travel from Houston to Austin for B. Cottrell deposition preparation and deposition.	3.30	875.00	2,887.50
10/29/24	PB	Travel from Houston to Dallas for deposition of J. Matthews	1.90	725.00	1,377.50
10/30/24	VO	Return travel following depositions AUS-SNA.	6.00	875.00	5,250.00
10/30/24	PB	Return travel from Dallas to Los Angeles following deposition of J. Matthews.	5.50	725.00	3,987.50
10/30/24	SR	Travel from Austin to Los Angeles following B. Cottrell deposition.	8.20	650.00	5,330.00
10/31/24	BA	Travel from Dulles Airport (DC) to Montpelier, VT, completion of return travel from depositions of T. Lewis and J. Matthews.	4.20	1050.00	4,410.00

TOTAL PROFESSIONAL SERVICES	**$ 68,292.50**
50% discount	$ -34,146.25
NET PROFESSIONAL SERVICES	**$ 34,146.25**

Invoice # 14295 November 14, 2024

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	6.20	1,100.00	6,820.00
Bridget Asay	BA	Partner	11.00	1,050.00	11,550.00
Victor O'Connell	VO	Partner	20.30	875.00	17,762.50
John Stokes	JS	Partner	7.00	875.00	6,125.00
Peter Brody	PB	Associate	23.00	725.00	16,675.00
Sarah Rahimi	SR	Associate	14.40	650.00	9,360.00
Total			**81.90**		**$ 68,292.50**

TOTAL THIS INVOICE **$ 34,146.25**

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 THIRD MONTHLY FEE STATEMENT
FOR THE PERIOD NOVEMBER 1, 2024, THROUGH NOVEMBER 30, 2024

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 November 1, 2024 through November 30, 2024 (the "Second Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $719,844.00 (80% of the services rendered), plus $382,654.12 (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.

[1] 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 Second 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 (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 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;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (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 (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 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 (ha.nguyen@usdoj.gov), 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 23rd day of December, 2024.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
Patricia B. Tomasco (SBN 01797600)
Joanna D. Caytas (SBN 24127230)
Cameron Kelly (SBN 24120936)
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-and-

STRIS & MAHER LLP

Peter K. Stris (pro hac vice)
Victor O'Connell (pro hac vice)
John Stokes (pro hac vice)
Peter Brody (pro hac vice)
Helen Marsh (pro hac vice)

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-and-

LEHOTSKY KELLER COHN LLP

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408 W. 11th Street, 5th Floor
Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on December 23, 2024, 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

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	0.60	$660.00	$528.00
002	Temple Green Data Matter	19.20	$16,800.00	$13,440.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	1209.70	$804,262.50	$643,410.00
007	Retention and Fee Applications	46.5	$46,190.00	$36,952.00
008	Non-working Travel for Whinstone Dispute	100.60	$31,892.50	$25,514.00
Total		1376.60	$899,805.00	$719,844.00

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,100.00	0.60	$660.00

Temple Green Data Matter

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Victor O'Connell	Partner	2012	$875.00	19.20	$16,800.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,100.00	15.20	$16,720.00
Bridget Asay	Partner	1997	$1,050.00	164.40	$172,620.00
Victor O'Connell	Partner	2012	$875.00	62.60	$54,775.00
John Stokes	Partner	2016	$875.00	192.70	$168,612.50
Colleen Smith	Associate	2015	$725.00	56.40	$40,890.00
Peter Brody	Associate	2016	$725.00	179.90	$130,427.50
Sarah Rahimi	Associate	2019	$650.00	8.30	$5,395.00
Helen Marsh	Associate	2024	$600.00	133.30	$79,980.00
Monica Viramontes	Senior Paralegal	N/A	$400.00	78.00	$31,200.00
Andrew Atsalis	Litigation Fellow	N/A	$325.00	105.60	$34,320.00
Cynthia Huang	Litigation Fellow	N/A	$325.00	116.30	$37,797.50
Sebastian Delgado	Litigation Fellow	N/A	$325.00	8.30	$2,697.50
Shayra Banta	Litigation Fellow	N/A	$325.00	8.70	$2,827.50
Jaida Hodge-Adams	Litigation Fellow	N/A	$325.00	80.00	$26,000.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Peter K. Stris	Founding Partner	2001	$1,250.00	1.20	$1,500.00
Elizabeth Brannen	Managing Partner	2001	$1,100.00	35.90	$39,490.00
Victor O'Connell	Partner	2012	$875.00	3.90	$3,412.50
Andrew Atsalis	Litigation Fellow	N/A	$325.00	3.40	$1,105.00
Cynthia Huang	Litigation Fellow	N/A	$325.00	0.90	$292.50
Nicholas Capalbo	Litigation Fellow	N/A	$325.00	1.20	$390.00

Non-Working Travel for Whinstone Dispute[2]

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Bridget Asay	Partner	1997	$1,050.00	16.20	$17,010.00
Victor O'Connell	Partner	2012	$875.00	10.70	$9,362.50
John Stokes	Partner	2016	$875.00	9.90	$8,662.50
Peter Brody	Associate	2016	$725.00	11.10	$8,047.50
Helen Marsh	Associate	2024	$600.00	13.00	$7,800.00
Andrew Atsalis	Litigation Fellow	N/A	$325.00	16.50	$5,362.50
Cynthia Huang	Litigation Fellow	N/A	$325.00	12.20	$3,965.00
Jaida Hodge-Adams	Litigation Fellow	N/A	$325.00	11.00	$3,575.00
Total after 50% discount					$31,892.50

[2] Stris & Maher has billed its time for travel in connection with the Whinstone dispute during which no work was performed on a separate invoice at a 50% discount.

EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
E-discovery platform fees	$3,765.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
E-discovery platform fees	$6,411.00
Court reporter services	$60,121.20
Travel	$160,114.07
Expert fees	$133,015.75
Trial graphics and hot-seat operator	$19,227.10
Total	$378,889.12

EXHIBIT 4

Stris

December 19, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14330
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through November 30, 2024

RE: Midas Green Litigation

Total Professional Services	$ 660.00
Total Expenses Advanced	$ 3,765.00
TOTAL THIS INVOICE	**$ 4,425.00**
Previous Balance	$ 501.00
TOTAL BALANCE DUE	**$ 4,926.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14330 December 19, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
11/12/24	EB	Correspond with M. Soule regarding [redacted] (0.1); correspond with former patent counsel G. Cutri and Rhodium regarding [redacted] (0.1).	.20	1100.00	220.00
11/26/24	EB	Attend teleconference with C. Topping and C. Blackmon regarding [redacted].	.40	1100.00	440.00
		TOTAL PROFESSIONAL SERVICES			**$ 660.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	.60	1,100.00	660.00
Total			**.60**		**$ 660.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
10/31/24		JND eDiscovery - October invoice.	3,765.00
		TOTAL EXPENSES ADVANCED	**$ 3,765.00**
		TOTAL THIS INVOICE	**$ 4,425.00**

Stris & Maher LLP

Invoice # 14330 December 19, 2024

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14251	11/01/24	855.00	684.00	171.00
14257	11/04/24	8,190.00	8,058.00	132.00
14283	11/14/24	4,755.00	4,557.00	198.00

Previous Balance	$ 501.00
Balance Due This Invoice	$ 4,425.00
TOTAL BALANCE DUE	**$ 4,926.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 501.00	$ .00	$ .00	$ .00	$ 501.00

Stris

December 19, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14316
Client # 00346
Matter # 002

INVOICE SUMMARY

For professional services rendered through November 30, 2024

RE: Temple Green Data Litigation

Total Professional Services	$ 16,800.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 16,800.00**
Previous Balance	$ 5,634.50
TOTAL BALANCE DUE	**$ 22,434.50**

Electronic Invoice

Stris & Maher LLP

Invoice # 14316 December 19, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
11/06/24	VO	Confer with client representatives regarding client request for research regarding lease provision.	.40	875.00	350.00
11/07/24	VO	Emails with client representatives regarding [redacted] questions.	.10	875.00	87.50
11/08/24	VO	Review and analyze potential claims for [redacted] (0.3); prepare email to Rhodium client representatives regarding same (0.1).	.40	875.00	350.00
11/11/24	VO	Review letter from TGD and prepare draft response (2.7); emails with P. Tomasco regarding same (0.1); confer and calls with client in-house counsel regarding same (0.1).	2.90	875.00	2,537.50
11/17/24	VO	Review and analyze letter from counsel for TGD and prepare email to P. Tomasco and client representatives regarding same (1.3); review draft response to TGD sealed motion (0.3).	1.60	875.00	1,400.00
11/18/24	VO	Confer with C. Topping regarding [redacted].	.20	875.00	175.00
11/19/24	VO	Review operative lease and prepare email to Rhodium representative (0.2).	.20	875.00	175.00
11/20/24	VO	Emails with Rhodium representative and Quinn Emanuel regarding analysis of [redacted] lease (0.5).	.50	875.00	437.50
11/21/24	VO	Review and comment on purchase sale agreement (0.5); confer with P. Tomasco regarding preparation of cross-examination for upcoming [redacted] testimony (0.2); prepare cross-examination [redacted] (3.3); emails with B. Howell regarding exhibits for same (0.2).	4.20	875.00	3,675.00
11/24/24	VO	Continue to prepare cross-examination [redacted] and evaluate strategy for hearing in light of progress on same (7.3); emails with P. Tomasco regarding same (0.4); emails with Rhodium representative regarding same (0.1).	7.80	875.00	6,825.00
11/26/24	VO	Attend bid confirmation hearing (0.8) and update internal team regarding same (0.1).	.90	875.00	787.50
		TOTAL PROFESSIONAL SERVICES			**$ 16,800.00**

[redacted]

[redacted]

[redacted]

[redacted]

Name	Tkpr	Title	Hours	Rate	Total
Victor O'Connell	VO	Partner	19.20	875.00	16,800.00
Total			**19.20**		**$ 16,800.00**

TOTAL THIS INVOICE **$ 16,800.00**

Invoice # 14316 December 19, 2024

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14247	11/01/24	7,190.00	5,752.00	1,438.00
14259	11/04/24	15,300.00	12,240.00	3,060.00
14268	11/14/24	5,682.50	4,546.00	1,136.50

Previous Balance	$ 5,634.50
Balance Due This Invoice	$ 16,800.00
TOTAL BALANCE DUE	**$ 22,434.50**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 5,634.50	$ .00	$ .00	$ .00	$ 5,634.50

Stris

December 19, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14317
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through November 30, 2024

RE: Whinstone Litigation

Total Professional Services	$ 804,262.50
Total Expenses Advanced	$ 378,889.12
TOTAL THIS INVOICE	**$ 1,183,151.62**
Previous Balance	$ 539,631.50
TOTAL BALANCE DUE	**$ 1,722,783.12**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Invoice # 14317 December 19, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
11/01/24	VO	Correspond with team regarding trial witnesses.	.10	875.00	87.50
11/01/24	EB	Correspond with BA, JS, PB, LKC team, B. Howell, and Fulcrum regarding graphics set up at pretrial conference and preparation of trial graphics (0.9); review expert materials for updates and revisions to exhibit list (1.2); attend teleconference with BA, JS, and PB regarding same (1.0); advise PB, HM, ASA, and NC regarding review of Siddiqi deposition transcript for potential confidentiality designations (0.2).	3.30	1100.00	3,630.00
11/01/24	BA	Review confidentiality designations for Gibson and Brown depositions and correspond with HM and JS regarding same (0.8); review and revise draft reply memorandum in support of motion to assume (1.2); confer with EB, PB, and JS regarding trial exhibits and exhibit list (1.0); review and instruct Stris team regarding changes to trial exhibit list including review of potential exhibits and deposition transcripts (4.0); confer with JS regarding trial preparation and strategy (1.0).	8.00	1050.00	8,400.00
11/01/24	JS	Work on trial presentation planning (6.3); attend portion of teleconference with BA, EB, and PB regarding exhibit list (0.6); confer with BA regarding trial plan (1.0); confer with PB regarding trial witnesses preparation (1.0); confer with CS regarding trial brief (0.2); review and serve trial subpoena on C. Harris (0.3); review and evaluate assumption reply (0.5); review and revise B Gibson Daubert brief (0.5).	10.40	875.00	9,100.00
11/01/24	CS	Finalize and file motion to exclude expert testimony of Benjamin Gibson (0.5); continue drafting trial brief (9.2).	9.20	725.00	6,670.00
11/01/24	CHH	Review and analyze deposition transcripts and exhibits, and update trial exhibits list accordingly.	4.00	325.00	1,300.00
11/01/24	JH	Continue updating email exhibits as directed by PB and MV.	4.00	325.00	1,300.00
11/01/24	PB	Review and analyze reply brief regarding motion to assume (0.3); attend teleconference with EB, BA, and JS regarding revisions to exhibit list (1.0); continue preparing same (5.6); confer with JS regarding trial witness preparation (1.0).	7.90	725.00	5,727.50

Stris & Maher LLP

Invoice # 14317 December 19, 2024

Date	Tkpr	Description	Hours	Rate	Amount
11/01/24	ASA	Prepare sealed exhibit covers and material ahead of trial (2.4); gather relevant [redacted] SEC material at request of MV (0.7); highlighted proposed deposition designations to assist HM (3.0); create tables and finalize Debtors' Motion to Exclude Testimony of Whinstone's Expert Benjamin Gibson (1.9).	8.00	325.00	2,600.00
11/01/24	HM	Continue reviewing and analyzing Nathan Nichols deposition transcript for confidentiality designations and draft correspondence to opposing counsel (4.4); review and respond to team correspondence regarding post-deposition tasks (0.9); review, revise, and draft portion of Daubert motion for Whinstone safety expert Benjamin Gibson (3.1); finalize and serve confidentiality designation correspondence for Benjamin Gibson, David Schatz, and Kevin Haugen (0.2).	8.60	600.00	5,160.00
11/01/24	MV	Continue preparing trial exhibits, advising litigation fellows regarding supporting tasks, and revising exhibit list.	10.00	400.00	4,000.00
11/02/24	BA	Research and draft reply memorandum in support of motion to assume (6.7); confer with JS regarding same (0.3); correspond with PB regarding exhibit list (0.2).	7.20	1050.00	7,560.00
11/02/24	JS	Continue preparing opening (7.2); prepare direct exam of N. Nichols (4.0); review and evaluate assumption reply (0.7) and confer with BA (0.3) and W. Thompson and J. Cohn regarding same (0.8).	13.00	875.00	11,375.00
11/02/24	CS	Continue drafting trial brief.	4.00	725.00	2,900.00
11/02/24	CHH	Review and update trial exhibit list as directed by PB and MV.	4.30	325.00	1,397.50
11/02/24	PB	Continue preparing trial exhibit list (3.4); attend teleconferences with W. Thompson (0.5) and A. Swartz (0.3) regarding revisions to same.	4.20	725.00	3,045.00
11/02/24	HM	Finalize and serve confidentiality designations for the transcript of the deposition of Jeff McGonegal (0.1); review and analyze transcript of deposition of Alex Peloubet for confidentiality designations and draft correspondence to opposing counsel (3.2); begin reviewing and analyzing transcript of deposition of Tiffany Lewis for confidentiality designations (1.7).	5.00	600.00	3,000.00

Invoice # 14317 December 19, 2024

Date	Tkpr	Description	Hours	Rate	Amount
11/02/24	MV	Continue preparing trial exhibits and revising exhibit list.	6.00	400.00	2,400.00
11/03/24	EB	Correspond with PB regarding exhibit list (0.1); review and respond to correspondence from BA and update clients regarding trial preparation and attendance (0.2).	.30	1100.00	330.00
11/03/24	BA	Continuing researching and revising reply memorandum in support of motion to assume and convey same to JS for review (0.7); review edits on reply memorandum from J. Cohn, implement same and further revise draft, correspond with HM regarding citations for same, and convey same to bankruptcy and litigation teams for review (1.9); review draft trial brief, correspond with JS regarding same, confer with CS regarding strategy for same, review research from [redacted] on contract positions as relevant to same, and research, draft, and revise same (2.9); correspond and confer with JS regarding reply brief in support of motion for summary judgment, analyze outline for same, and participate in teleconference with JS, CS, J. Cohn, and W. Thompson regarding strategy for same (1); ,correspond with bankruptcy team and with client team regarding trial preparation logistics (0.1); correspond with SD regarding assistance with summary judgment hearing preparation (0.1); review draft motion in limine and correspond with litigation team regarding same (0.3); review draft motion in limine regarding materials not disclosed by expert and correspond with litigation team regarding same (0.2).	7.20	1050.00	7,560.00
11/03/24	JS	Prepare outline of MSJ reply brief (1.3); review and revise MILs (1.5); confer with CS (0.3), BA (0.3), and BA, CS, J. Cohn, and W. Thompson (0.5) regarding MILs and MSJ reply; continue work on opening (2.7) and direct examination of N. Nichols (2.0) and confer with PB regarding same (1.0).	9.60	875.00	8,400.00
11/03/24	CS	Meet with JS, BA, J. Cohn, and W. Thompson to discuss substance of reply in support of motion for summary judgment (.4); meet with JS and BA to discuss trial brief (.3); continue drafting reply in support of motion for summary judgment (5.9).	6.60	725.00	4,785.00

Invoice # 14317 December 19, 2024

Date	Tkpr	Description	Hours	Rate	Amount
11/03/24	PB	Prepare trial exhibit list (5.2); teleconference with MV regarding exhibit list (0.3); teleconference with JS regarding exhibit list and trial strategy (0.5); correspondence regarding same (0.4).	6.40	725.00	4,640.00
11/03/24	HM	Complete reviewing and analyzing Tiffany Lewis deposition transcript for confidentiality designations and draft correspondence to opposing counsel (0.8); review and analyze Alex Peloubet deposition transcript for confidentiality designations and draft correspondence to opposing counsel (1.2); begin reviewing and analyzing Brendan Cottrell deposition transcript for confidentiality designations (1.5); review and revise reply in support of motion to assume (1.5); finalize and serve confidentiality designations for deposition transcripts of Alex Peloubet, Tiffany Lewis, Shams Siddiqi, and Nathan Nichols (0.4).	5.40	600.00	3,240.00
11/03/24	MV	Continue gathering of trial exhibits, create Logikcull searches for Bates stamped versions of all documents including all family documents and Native files, create slipsheets for the same, continue revising internal exhibit list.	9.00	400.00	3,600.00
11/04/24	EB	Confer with BA, JS, ASA, and [redacted] regarding [redacted] and adjustments to same to facilitate [redacted] (0.6); assist BA, PB, and MV with updates to exhibit list and confidentiality designations (0.7).	1.30	1100.00	1,430.00
11/04/24	BA	Research, draft, and revise trial brief (6.4); confer with JS regarding trial strategy (0.2); correspond with PB and EB regarding issues with exhibit list, including potential sealing, and review draft of same (0.8); correspond with Quinn team, with JS and EB, and with litigation team, regarding trial preparation logistics (0.6); review draft motions in limine and correspond with HM, A. Swartz, and JS regarding finalization and filing of same (1); correspond with P. Tomasco regarding M. Robinson testimony and potential exhibits (0.1)	9.10	1050.00	9,555.00
11/04/24	JS	Continue preparing for pretrial conference and trial.	10.10	875.00	8,837.50

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Date	Tkpr	Description	Hours	Rate	Amount
11/04/24	CS	Review and revise reply in support of motion to assume (3.1); draft Asay declaration in support of reply in support of motion to assume (0.4); finalize and file reply in support of motion to assume (0.5); continue drafting reply in support of motion for summary judgment (6.6).	10.60	725.00	7,685.00
11/04/24	CHH	Prepare and finalize trial exhibits and trial exhibit list.	10.00	325.00	3,250.00
11/04/24	JH	Update internal bankruptcy docket [redacted] (0.5); coordinate with Stris team, Lehotsky Keller Cohn co-counsel, and Quinn Emmanuel Bankruptcy counsel regarding Houston travel logistics (no charge - 2.5); cite-check Debtors' Reply in Support of Debtors' Motion to Assume at CS request (3.0).	3.50	325.00	1,137.50
11/04/24	PB	Prepare trial exhibit list and supporting documents.	10.00	725.00	7,250.00
11/04/24	ASA	Attention to Houston trial logistics in light of bifurcation of trial (1.0); assist CHH, JHA, and MV with trial exhibit list preparation by collecting and recording information about relevant documents (4.2).	5.20	325.00	1,690.00
11/04/24	HM	Revise, finalize, and file motions in limine (5.3); continue performing discovery tasks related to protective order (2.2); review and respond to team correspondence regarding motions and trial preparation (0.7); review and revise reply in support of motion to assume (1.6).	9.80	600.00	5,880.00
11/04/24	SD	Start making binders of both parties' Partial Motions for Summary Judgment, exhibits, and replies (3.7).	3.70	325.00	1,202.50
11/04/24	MV	Continue gathering of trial exhibits, create [redacted] for Bates stamped versions of all documents including all family documents and Native files, create slip sheets for the same, continue revising internal exhibit list.	7.00	400.00	2,800.00
11/05/24	EB	Review and respond to Stris and LKC team correspondence regarding action items including finalization of exhibit list and exhibits and trial preparation (0.5); attend teleconference with PB regarding expert witness trial preparation (0.3).	.80	1100.00	880.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/05/24	BA	Participate in teleconference with Fulcrum representative, JS, PB, and HM to discuss graphics preparation (0.4); confer with PB regarding trial preparation and witness scripts (0.3); participate in teleconference with client team, litigation counsel, and bankruptcy counsel to discuss trial preparation and other priority action items (0.9); research, draft, and revise trial brief (6.6); review and revise reply brief in support of summary judgment motion, review proposed edits from J. Cohn, and correspond with CS and JS regarding edits to same (0.8);	9.00	1050.00	9,450.00
11/05/24	JS	Continue preparing for final pretrial conference and trial.	9.00	875.00	7,875.00
11/05/24	SB	Review trial exhibit list and identify documents that are meant to be filed under seal (1.1); create cover sheets for exhibits that are being filed under seal (2.3); create sharefile link to send the same to legal assistant CHH (0.2).	3.60	325.00	1,170.00
11/05/24	CS	Draft [redacted] in support of reply in support of motion for partial summary judgment (.2); continue drafting reply in support of motion for partial summary judgment (2.9); revise reply in support of motion for partial summary judgment in light of suggested edits (2.1); review and revise trial brief (2.9)	8.10	725.00	5,872.50
11/05/24	CHH	Prepare and finalize trial exhibits and trial exhibit list.	6.50	325.00	2,112.50
11/05/24	PB	Prepare trial exhibit list (2.2); teleconference with BA and JS regarding exhibit list (0.3); teleconference with EB regarding expert trial preparation (0.3); prepare cross-examination of J. Matthews (2.2); teleconference with C. Hickey (Fulcrum) and JS, BA, and HM regarding trial graphics (0.5); teleconference with BA regarding Matthews cross (0.5); call with K. Pritchard regarding T. Lewis testimony (0.3).	6.30	725.00	4,567.50
11/05/24	ASA	Update master contact list to ensure ease of communication among team members and external contacts (0.4); update [redacted] memorandum and tend to file organization to reflect recent case activity (1.9); correspond with Houston hotel to make alterations to booking (no charge - 0.5); further assist with trial preparatory tasks in advance of pre-trial hearing and trial (3.1).	5.40	325.00	1,755.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/05/24	HM	Continue performing post-deposition tasks under the protective order (3.3); review and organize deposition transcripts and videos (4.2); review and revise trial brief (1.0); attend meeting with Fulcrum Legal, BA, JS, and PB to discuss trial preparation (0.4).	8.90	600.00	5,340.00
11/05/24	SD	Continue to prepare binders for the upcoming trial in U.S. Bankruptcy Court of the Southern District of Texas (1.0).	1.00	325.00	325.00
11/05/24	MV	Continue finalizing trial exhibits, correspondence with PB and CH regarding the same (1.0); create copies of all Native sealed and unsealed trial exhibits for service (0.5); review final exhibit list and cross check omitted exhibits and official descriptions with internal list, update the same in preparation for trial (3.5).	5.00	400.00	2,000.00
11/06/24	EB	Advise ASA regarding high priority hearing and trial preparation action items (0.1); continue assisting with trial preparation (1.0).	1.10	1100.00	1,210.00
11/06/24	BA	Research, review, and revise trial brief (4.5); prepare for summary judgment argument (3); confer with JS, W. Thompson, and J. Cohn regarding strategy for and edits to reply brief in support of summary judgment and argument regarding same, and correspond with CS regarding same (0.5); correspond with [redacted] regarding declaration for reply brief, with [redacted] regarding reply brief filing, and with litigation and bankruptcy team regarding motions in limine (0.2).	8.20	1050.00	8,610.00
11/06/24	JS	Continue preparing for final pretrial conference and trial.	12.20	875.00	10,675.00
11/06/24	CS	Revise reply in support of motion for partial summary judgment (5.2); finalize declaration of Bridget Asay and exhibits in support of reply brief (0.6); review and revise trial brief (2.2).	8.00	725.00	5,800.00
11/06/24	JH	Cite-check reply brief in support of Debtors' motion for partial summary judgment at CS request (5.0).	5.00	325.00	1,625.00
11/06/24	PB	Prepare Matthews cross-examination outline (1.4); prepare direct examination outline for A. Peloubet (5.5); revise trial exhibit list and correspondence regarding same (3.8).	10.70	725.00	7,757.50

Stris & Maher LLP

Invoice # 14317 December 19, 2024

Date	Tkpr	Description	Hours	Rate	Amount
11/06/24	ASA	Update [redacted] memorandum to reflect recent case activity (1.0); gather deposition transcripts for trial preparation (0.6); circulate contact information amongst trial team (0.1); review trial exhibits and master exhibit list to ensure proper preparation of material (2.5); attention to trial and travel logistics on behalf of attorneys and support staff (no charge - 0.8).	4.20	325.00	1,365.00
11/06/24	HM	Review and revise trial brief (7.1); review and respond to team correspondence regarding trial preparation (0.3).	7.40	600.00	4,440.00
11/06/24	SD	Finalize Rhodium binders for upcoming Bankruptcy Court trial (1.9).	1.90	325.00	617.50
11/06/24	MV	Review additional documents added to exhibits by attorneys, save originals for internal records, update internal exhibit list regarding the same (2.0); review local rules and judge standing order regarding pre-trial conference and documents required, correspondence with PB regarding the same (0.5); continue review of internal exhibit list and cross reference official list for updated sealing designations, update the same (2.0); add missing information in preparation for trial (3.0)	6.50	400.00	2,600.00
11/07/24	EB	Continue assisting with summary judgment hearing and trial preparation.	.60	1100.00	660.00
11/07/24	BA	Prepare for summary judgment hearing and for trial (6.8).	6.80	1050.00	7,140.00
11/07/24	JS	Prepare for final pre-trial conference.	11.50	875.00	10,062.50
11/07/24	SR	Begin reviewing and analyzing file and deposition transcript in connection with drafting trial cross outline for B. Cottrell.	2.70	650.00	1,755.00
11/07/24	SB	Assist JS with trial preparation by reviewing Whinstone's exhibit list and identifying witness designations (1.4); cite check trial brief for CS (3.7).	5.10	325.00	1,657.50
11/07/24	CS	Revise trial brief (8.6); draft [redacted] declaration in support of trial brief (0.4); collect and finalize exhibits in support of trial brief (0.6); finalized and file trial brief (.3).	9.90	725.00	7,177.50
11/07/24	CHH	Prepare materials for pre-trial conference.	6.00	325.00	1,950.00
11/07/24	JH	Assist in preparation for pre-trial conference.	3.00	325.00	975.00

Stris & Maher LLP

Invoice # 14317 December 19, 2024

Date	Tkpr	Description	Hours	Rate	Amount
11/07/24	PB	Prepare trial exhibit list (0.7); prepare direct examination outline for A. Peloubet (4.5); prepare cross outline regarding B. Gibson (2.3); review and analyze draft trial brief (0.6); teleconference with EB regarding trial strategy (0.2).	8.30	725.00	6,017.50
11/07/24	ASA	Gather documents at request of JS and initiate creation of binders for Motions for Summary Judgment and Motion to Exclude Whinstone's expert Benjamin Gibson.	2.00	325.00	650.00
11/07/24	HM	Assist with pretrial hearing preparation tasks (2.0); discuss trial preparation with PB and W. Thompson (1.1); review and respond to team correspondence regarding trial preparation (1.2).	4.30	600.00	2,580.00
11/07/24	MV	Review Rhodium court endorsed trial exhibits and cross reference all electronic court numbering on internal list for both sealed and unsealed versions, update internal exhibit list, correspondence regarding the same.	8.00	400.00	3,200.00
11/08/24	VO	Confer with BA and JS regarding preparation for hearing on motions for summary judgment and motions in limine (0.5); meet with client, P. Tomasco, and litigation teams in preparation for pretrial conference (2.5); attend pretrial conference and motions hearing (3.0); debrief with team and plan regarding next steps (1.7).	7.70	875.00	6,737.50
11/08/24	EB	Continue assisting with trial preparation (1.0); review team correspondence regarding hearing and resulting action items (0.1).	1.10	1100.00	1,210.00
11/08/24	BA	Prepare for, attend and participate in status conference and pretrial motions hearing, and confer with litigation team, bankruptcy team, and client representatives (10.5); prepare for trial, including review of proposed deposition designations from Whinstone (2.5).	13.00	1050.00	13,650.00
11/08/24	JS	Prepare for and attend final pretrial conference (6.5); prepare for first day of trial (7.8).	14.30	875.00	12,512.50
11/08/24	SR	Continue drafting B. Cottrell cross outline.	5.60	650.00	3,640.00
11/08/24	CHH	Assist in preparations for pre-trial hearing (4.5); attend pre-trial hearing (3.5); assist JS with preparations of opening slides for trial (1.0).	9.00	325.00	2,925.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/08/24	JH	Collect all Whinstone and Rhodium exhibits internally for attorney reference (2.0); attend pre-trial conference with BA, JS, VO, PB, HM, ASA, CHH, Lehotsky Keller Cohn co-counsel (W. Thompson), and clients (M. Soule, C. Topping, C. Blackmon, N. Nichols) (3.0); attend de-brief with litigation team to discuss [redacted] (1.0); prepare transcript of opposing counsel M. Thomas' hearing testimony regarding notices of breach and May 2022 termination letter for BA (2.5).	8.50	325.00	2,762.50
11/08/24	PB	Prepare cross examination outline regarding B. Gibson (0.8); prepare for final pre-trial conference (4.5); attend final pre-trial conference (3.5); follow-up team meeting regarding trial strategy (1.5); case strategy discussion with BA, JS, and W. Thompson (1.0); review deposition designations for A. Peloubet (1.2); meeting with JS regarding opening slides (2.6); review depositions (1.0).	16.10	725.00	11,672.50
11/08/24	ASA	Assist with final preparations for pre-trial hearing (4.0); highlight Whinstone's designations of relevant deposition testimony (2.0); attend pre-trial hearing (3.5); assist with collection of documents relevant to B. Cottrell witness preparation (1.3).	10.80	325.00	3,510.00
11/08/24	HM	Attend pretrial conference (3.5); prepare for pretrial conference including working with hot seat operator to prepare exhibits (3.7); attend meeting with client and Stris, Lehotsky, and Quinn litigation teams to discuss pretrial conference and trial strategy (2.0).	9.20	600.00	5,520.00
11/08/24	MV	Download Whinstone court endorsed exhibits, document the same on internal list with referenced electronic court filed numbering, add descriptions of exhibits, send the same to vendor in preparation for trial (7.0); make copies of all exhibits for internal records (0.5).	7.50	400.00	3,000.00
11/09/24	VO	Draft direct script for B. Cottrell examination (2.6); review and revise [redacted] for B. Cottrell trial preparation (0.5); attend trial preparation session with B. Cottrell (5.2).	8.30	875.00	7,262.50
11/09/24	BA	Trial preparation, including drafting and review of scripts, exhibits, exhibit objections, and strategy assessments and planning.	12.00	1050.00	12,600.00

Stris & Maher LLP

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Date	Tkpr	Description	Hours	Rate	Amount
11/09/24	JS	Prepare for first day of trial.	12.00	875.00	10,500.00
11/09/24	CHH	Assist JS with [redacted] (witness) direct examination preparations (3.0); assist VO with [redacted] (witness) cross examination preparations (5.0); legal research for BA on various evidentiary issues in preparation for trial (3.0); assist with various other trial preparations (1.5).	12.50	325.00	4,062.50
11/09/24	JH	Begin comparing B. Cottrell deposition and Temporary Injunction hearing transcripts to [redacted] (5.0); perform other administrative tasks as needed (3.0).	8.00	325.00	2,600.00
11/09/24	PB	Preparation for trial on motion to assume.	16.10	725.00	11,672.50
11/09/24	ASA	Assist PB and B. Wiggins of Fulcrum Legal Graphics with preparation of slides for use during trial, including review of deposition of Whinstone N. Burnett (2.0); download and share deposition video of N. Nichols with client (0.5); conduct legal research alongside CHH on various issues specified by BA in preparation for trial (3.3); assist with other iterative trial preparations (2.5).	8.30	325.00	2,697.50
11/09/24	HM	Draft and revise responses to Whinstone's objections to evidence in Rhodium's summary judgment briefs (7.0); assist with pretrial tasks, including reviewing and revising opening argument slide deck and discussing trial strategy with BA, JS, PB, and W. Thompson (1.3); draft and revise direct examination outline of Dr. Eric Brown (1.5).	9.80	600.00	5,880.00
11/09/24	MV	Review Native files pertaining to trial exhibits and previously sent to the judge's clerk, discuss the same with attorney PB, determine missing Native files and create zip/correspondence for judge's courtesy copies.	1.00	400.00	400.00
11/10/24	VO	Participate in portions of multiple Rhodium witness preparation sessions (4.0); participate in trial preparation (4.1).	8.10	875.00	7,087.50
11/10/24	BA	Trial preparation, including exhibit review, script preparation, witness preparation, and strategy assessment.	12.90	1050.00	13,545.00
11/10/24	JS	Prepare for first day of trial.	10.30	875.00	9,012.50

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Date	Tkpr	Description	Hours	Rate	Amount
11/10/24	CHH	Assist attorneys with preparation for direct and cross-examination including preparation of witness binders and coordination with B. Wiggins (Fulcrum) regarding document displays for witness examinations.	9.70	325.00	3,152.50
11/10/24	JH	Assist with pretrial support including identifying trial exhibits for attorneys (3.2); prepare memorandum identifying [redacted] between [redacted] at VO request (4.8).	8.00	325.00	2,600.00
11/10/24	PB	Preparation for trial on motion to assume.	16.90	725.00	12,252.50
11/10/24	ASA	Assist attorneys and CHH with review of past witness testimony, counter-designations, and exhibit binder preparation for use during examination of witnesses (3.6); continue legal research for HM in support of objections (1.6); assist with additional pretrial action items in support of attorney team (2.9).	8.10	325.00	2,632.50
11/10/24	HM	Prepare and revise responses to Whinstone's evidentiary objections to Rhodium's summary judgment briefs (3.4); continue assisting with trial preparation including of witnesses for direct examination and opening presentation (5.9).	9.30	600.00	5,580.00
11/11/24	VO	Conduct further witness preparation with [redacted] (1.2); meetings with team in preparation for trial (1.6).	2.80	875.00	2,450.00
11/11/24	BA	Trial preparation, including witness scripts, cross preparation, witness preparation, exhibit review, and strategy analysis.	13.20	1050.00	13,860.00
11/11/24	JS	Prepare for first day of trial.	16.30	875.00	14,262.50

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Date	Tkpr	Description	Hours	Rate	Amount
11/11/24	CHH	Assist A. Swartz (LKC) with N. Miljkovic (witness) cross examination preparations (1.0); assist W. Thompson (LKC) with C. Harris (witness) cross examination preparations (1.0); assist JS with [redacted] (witness) direct examination preparations (1.0); review and finalize witness binders for N. Nichols, C. Harris, D. Schatz, and N. Miljkovic (witnesses) (1.5); review and analyze Whinstone and Debtors' objections to exhibit lists to create exhibit admission tracker and final, [redacted] exhibit lists for use at trial (4.0); emails and telephone calls with L. Garcia (printing service contact) regarding preparation of witness binders and exhibit lists (0.3); emails with B. Wiggins (Fulcrum) regarding document displays with witness examinations (0.2).	9.00	325.00	2,925.00
11/11/24	JH	Continue assisting with trial support including preparation of exhibit tracking spreadsheet and other tasks as directed by attorneys.	8.00	325.00	2,600.00
11/11/24	PB	Preparation for trial on motion to assume.	17.30	725.00	12,542.50
11/11/24	ASA	Assist attorneys with administrative tasks and preparation for trial incuding preparing examination binders and responding to iterative requests alongside CHH and JHA regarding organization and compliation of documents for use during trial.	7.70	325.00	2,502.50
11/11/24	HM	Perform trial preparation tasks, including reviewing and revising opening statement presentation, conferring with litigation team regarding trial and exhibit logistics, and revising Dr. Eric Brown direct examination outline.	6.30	600.00	3,780.00
11/12/24	VO	Attend trial.	8.00	875.00	7,000.00
11/12/24	BA	Trial preparation and trial attendance.	14.00	1050.00	14,700.00
11/12/24	JS	Prepare for and attend trial.	15.50	875.00	13,562.50

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Date	Tkpr	Description	Hours	Rate	Amount
11/12/24	CHH	Assist with filing of amended exhibit and amended exhibit list (0.3); assist W. Thompson (LKC) with J. McGonegal (witness) cross examination preparations (1.0); assist W. Thompson (LKC) with N. Burnett (witness) cross examination preparations (0.5); emails and telephone calls with L. Garcia (printing service contact) regarding preparation of witness binders (0.2); attend portions of trial day one and assist attorneys with admitted exhibits tracking (5.0); continue assisting with various other trial preparations (3.5); prepare list of Debtors' and Whinstone's admitted exhibits and copies of same for attorney review (1.0).	11.50	325.00	3,737.50
11/12/24	JH	Attend trial while marking admitted exhibits and fulfilling various other attorney requests as needed.	8.00	325.00	2,600.00
11/12/24	PB	Attend trial and preparation for same.	16.50	725.00	11,962.50
11/12/24	ASA	Attend court proceedings and actively support attorneys during trial [redacted] (8.0); assist PB and BA with finalization of witness examination binders [redacted] (3.0).	11.00	325.00	3,575.00
11/12/24	HM	Continue preparing for and assisting with trial day 1, including tracking admitted exhibits and conducting document research (9.0); assist with preparations for trial day 2 (0.3).	9.30	600.00	5,580.00
11/12/24	MV	Continue updating exhibit list information to ensure completeness, accuracy with respect to Phase 1, and preparation for Phase 2 trial.	5.00	400.00	2,000.00
11/13/24	VO	Attend trial.	8.00	875.00	7,000.00
11/13/24	EB	Remotely attend and continue assisting with portions of trial day 2.	1.00	1100.00	1,100.00
11/13/24	BA	Trial preparation and attendance at trial.	13.90	1050.00	14,595.00
11/13/24	JS	Prepare for and attend trial.	11.90	875.00	10,412.50
11/13/24	CHH	Prepare for trial day two (2.5); attend trial day two and assist attorneys with admitted exhibits (9.0); review and analyze Court's minute entry and prepare list of admitted exhibits and copies of same for attorney review (1.0).	12.50	325.00	4,062.50

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Date	Tkpr	Description	Hours	Rate	Amount
11/13/24	JH	Attend trial while marking admitted exhibits and fulfilling various other attorney requests as needed.	8.00	325.00	2,600.00
11/13/24	PB	Attend trial and preparation for same.	15.30	725.00	11,092.50
11/13/24	ASA	Make adjustments to final binder for use by BA in cross of J. Matthews (0.8); attend portion of court proceedings and support attorneys when requests for documents arise (9.2).	10.00	325.00	3,250.00
11/13/24	HM	Continue preparing for and assisting with trial day 2, including tracking admitted exhibits and conducting document research (9.0); assist with preparations for trial day 3 and 4, including drafting evidentiary chart for closing argument and conducting research on [redacted] (3.2).	12.20	600.00	7,320.00
11/13/24	MV	Continue updating exhibit list information to ensure completeness, accuracy with respect to Phase 1, and preparation for Phase 2 trial.	5.00	400.00	2,000.00
11/14/24	VO	Attend trial.	8.00	875.00	7,000.00
11/14/24	EB	Remotely attend portions of trial.	1.50	1100.00	1,650.00
11/14/24	BA	Trial preparation and attendance at trial.	14.30	1050.00	15,015.00
11/14/24	JS	Prepare for and attend trial.	16.40	875.00	14,350.00
11/14/24	CHH	Prepare for trial day three (2.5); observe and assist with trial day three (9.0).	11.50	325.00	3,737.50
11/14/24	JH	Attend trial while marking admitted exhibits and fulfilling various other attorney requests as needed.	8.00	325.00	2,600.00
11/14/24	PB	Attend trial and prepare for final day of trial.	18.20	725.00	13,195.00
11/14/24	ASA	Prepare for trial day three by tending to attorney requests (2.5); observe and assist with trial day three (9.0); assist attorneys after trial day three (1.5).	13.00	325.00	4,225.00
11/14/24	HM	Continue preparing for and assisting with trial day 3, including tracking admitted exhibits and conducting document research (9.5); assist with preparations for trial day 2, including conducting witness preparation with [redacted] and drafting correspondence to opposing counsel (1.5).	11.00	600.00	6,600.00
11/15/24	VO	Attend trial.	6.00	875.00	5,250.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/15/24	EB	Remotely attend portions of trial (2.5); update C. Griffey on status (0.1).	2.60	1100.00	2,860.00
11/15/24	BA	Trial preparation and attendance at trial.	8.40	1050.00	8,820.00
11/15/24	JS	Prepare for and attend final day of trial.	8.70	875.00	7,612.50
11/15/24	CHH	Prepare for trial day four (0.5); attend and assist with trial day four (8.0).	8.50	325.00	2,762.50
11/15/24	JH	Attend trial while marking admitted exhibits and fulfilling various other attorney requests as needed.	8.00	325.00	2,600.00
11/15/24	PB	Attend final day of trial.	9.20	725.00	6,670.00
11/15/24	ASA	Prepare for trial day four (0.7); attend court proceedings of trial day four (8.0); assist attorneys with related documents and files (2.3).	11.00	325.00	3,575.00
11/15/24	HM	Continue preparing for and assisting with trial day 4, including tracking admitted exhibits, conducting document research, and participating in strategy discussions (7.5); debrief with litigation teams (0.5).	8.00	600.00	4,800.00
11/15/24	MV	Review internal exhibit list for universe of documents and segregate Phase 2 trial documents, create [redacted] for missing information related to document Bates numbers, in preparation for trial Phase 2 [redacted].	6.00	400.00	2,400.00
11/16/24	EB	Attention to post-trial action items.	.20	1100.00	220.00
11/17/24	VO	Confer with JS regarding [redacted] (0.1); review same (0.2); prepare for (0.2) and confer with client representatives regarding same (0.7); correspondence with JS and PS regarding same (0.6); confer with P. Tomasco regarding same (0.3); emails with team and client representatives regarding [redacted] (0.3).	2.40	875.00	2,100.00
11/17/24	EB	Review and respond to team correspondence regarding [redacted] and analysis (0.2); attention to post-trial action items (0.1).	.30	1100.00	330.00
11/17/24	BA	Collect [redacted] from experts and convey same to VO.	.30	1050.00	315.00
11/18/24	VO	Attend client meeting.	2.00	875.00	1,750.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/18/24	EB	Correspond with BA and JS regarding damages experts and potential supplementation (0.1); advise HM regarding post-trial case management-related action items (0.1).	.20	1100.00	220.00
11/18/24	BA	Confer with JS and correspond with EB regarding follow up with C. Griffey regarding [redacted]; correspond with litigation team regarding [redacted] damages.	.30	1050.00	315.00
11/18/24	ASA	Attention to payment of invoice for transcript request (0.1); organize trial material and update matter memorandum at request of HM (0.8).	.90	325.00	292.50
11/18/24	MV	Continue review of internal exhibit list for universe of documents and Phase 2 trial, determine missing information and update list with document identification and Bates numbers, complete all fields in preparation for possible Phase 2 trial.	2.00	400.00	800.00
11/19/24	EB	Confer with BA regarding ERCOT expert analysis (0.2); review and respond to team correspondence regarding same and post-trial action items (0.2).	.40	1100.00	440.00
11/19/24	BA	Participate in portion of client call with JS, W. Thompson, J. Cohn, and P. Tomasco (0.8); confer with EB regarding C. Griffey opinion and [redacted] (0.2); correspond with C. Griffey regarding meeting and with W. Thompson regarding updated closing slides (0.1).	1.10	1050.00	1,155.00
11/19/24	JS	Evaluate potential phase 2 issues (0.9) and prepare for and attend touch point call (1.3).	2.20	875.00	1,925.00
11/19/24	HM	Review and analyze documents for confidentiality designations (0.8).	.80	600.00	480.00
11/20/24	EB	Review update from and correspond with HM regarding compilation and provision of unredacted information to C. Griffey.	.20	1100.00	220.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/20/24	BA	Review Siddiqi and Griffey expert reports as relevant to potential phase 2 and [redacted] (0.5); participate in meeting with expert C. Griffey, BA, and SD to discuss issues raised in rebuttal report as well as [redacted] in phase 2 of the trial (0.4); attend debrief meeting with JS and SD following meeting with expert C. Griffey (0.2); correspond with HM, EB, and JS to provide direction for HM to collect and review unredacted data as needed for C. Griffey (0.3); correspond with HM and with W. Thompson on follow up matters from trial to ensure litigation files are complete (0.2); confer with JS and correspond with JS and litigation team regarding response to opposing counsel and phase 2 timing (0.2).	1.80	1050.00	1,890.00
11/20/24	JS	Prepare for and attend damages call with Stris and LKC teams (1.5); prepare for and attend call with C. Griffey and Stris team regarding phase 2 issues (0.9); prepare for and attend call with [redacted] regarding [redacted] (0.9); prepare for and attend group calls regarding damages issues (1.6).	4.90	875.00	4,287.50
11/20/24	CHH	Prepare and finalize materials to share with expert C. Griffey.	.20	325.00	65.00
11/20/24	HM	Review and analyze documents to send to C. Griffey for trial phase 2 (3.0); continue assisting with post-trial phase 1 tasks, including qc of exhibit docketing and internal file updates (1.5).	4.50	600.00	2,700.00
11/20/24	SD	Participate in meeting with expert C. Griffey, BA, and JS to discuss issues raised in rebuttal report as well as potential expert involvement in phase 2 of the trial (0.4); attend debrief meeting with BA and JS following meeting with expert C. Griffey (0.2).	.60	325.00	195.00
11/21/24	VO	Confer with [redacted] regarding strategic action items.	.70	875.00	612.50
11/21/24	SD	Attend and prepare notes regarding 11/20/24 meeting with expert C. Griffey.	1.10	325.00	357.50
11/22/24	BA	Correspond with J. Cohn and litigation team regarding phase two timing, and correspond with C. Griffey to convey additional data and [redacted] and to confirm [redacted] (0.3).	.30	1050.00	315.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/25/24	BA	Prepare for (0.3) and participate in (0.5) teleconference with C. Griffey and HM to discuss status of [redacted] based on unredacted data; confer with EB regarding potential next steps for same (0.2).	1.00	1050.00	1,050.00
11/25/24	HM	Confer with BA and C. Griffey about [redacted] for phase 2 (0.5); review and analyze documents for C. Griffey (1.5).	2.00	600.00	1,200.00
11/26/24	VO	Attend status conference; emails with team regarding next steps regarding outcome of same.	.50	875.00	437.50
11/26/24	EB	Attend portion of debrief from ruling announcement (0.2); attention to resulting action items including expert updates (0.1).	.30	1100.00	330.00
11/26/24	BA	Attend portion of remote status conference regarding motion to assume (0.3); confer with JS, W. Thompson, and J. Cohn regarding next steps (0.3); confer with litigation and bankruptcy team regarding case strategy and phase 2 (0.5); attend client call with bankruptcy and litigation counsel (0.5); correspond with PB and JS regarding court's preliminary ruling, prepare talking points for [redacted], and correspond with C. Griffey regarding preliminary ruling and anticipated schedule (0.4); correspond and confer with EB regarding preliminary ruling and likely next steps (0.1); correspond with JS and EB regarding [redacted] by C. Griffey and information needed to support same (0.3).	2.40	1050.00	2,520.00
11/26/24	JS	Prepare for and attend status conference on ruling (0.6); attend debrief calls with Stris, LKC, and Rhodium teams (2.5); evaluate next steps in light of partial ruling on assumption motion (1.3).	4.40	875.00	3,850.00
11/26/24	CHH	Attend hearing regarding motion to assume contracts and debrief with trial team (0.8); review and update matter docket (0.3).	1.10	325.00	357.50
11/26/24	PB	Prepare for and attend hearing on motion to assume contracts.	.50	725.00	362.50

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Date	Tkpr	Description	Hours	Rate	Amount
11/26/24	HM	Attend status conference before Judge Alfredo Perez (0.5); confer with Stris, Lehotsky, and Quinn litigation teams to discuss status conference and upcoming tasks (0.4); attention to organization of internal files and memoranda (0.6).	1.50	600.00	900.00

TOTAL PROFESSIONAL SERVICES **$ 804,262.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	15.20	1,100.00	16,720.00
Bridget Asay	BA	Partner	164.40	1,050.00	172,620.00
Victor O'Connell	VO	Partner	62.60	875.00	54,775.00
John Stokes	JS	Partner	192.70	875.00	168,612.50
Colleen Smith	CS	Associate	56.40	725.00	40,890.00
Peter Brody	PB	Associate	179.90	725.00	130,427.50
Sarah Rahimi	SR	Associate	8.30	650.00	5,395.00
Helen Marsh	HM	Associate	133.30	600.00	79,980.00
Monica Viramontes	MV	Sr Paralegal	78.00	400.00	31,200.00
Andrew Atsalis	ASA	Fellow	105.60	325.00	34,320.00
Cynthia Huang	CHH	Fellow	116.30	325.00	37,797.50
Sebastian Delgado	SD	Fellow	8.30	325.00	2,697.50
Shayra Banta	SB	Fellow	8.70	325.00	2,827.50
Jaida Hodge-Adams	JH	Fellow	80.00	325.00	26,000.00
Total			**1,209.70**		**$ 804,262.50**

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EXPENSES ADVANCED

Date	Task	Description	Amount
10/15/24		EB airfare from Tallahassee to Houston round trip for depositions.	808.00
10/16/24		PB airfare from LAX to Dallas for depositions.	338.95
10/17/24		JS Airfare from SD - Houston - SD for depositions.	839.97
10/17/24		EB airport parking while in Texas for depositions.	39.00
10/17/24		VO lodging in Austin for depositions.	426.42
10/17/24		VO airfare from Los Angeles to Dallas	563.98
10/17/24		VO airfare from Austin to LAX from depositions.	420.98
10/18/24		SR airfare from Los Angeles to Austin for depositions.	429.97
10/18/24		SR airfare from Austin to Los Angeles for depositions.	420.98
10/21/24		BA airfare from Washington DC to Vermont for depositions.	783.97
10/21/24		VO lodging in Houston for depositions.	972.85
10/21/24		CH airfare from Las Vegas to Houston for trial.	311.98
10/21/24		VO airfare from Dallas to Houston for depositions.	299.98
10/21/24		CH airfare from Houston to Las Vegas for trial.	128.97
10/22/24		BA airfare from Vermont to Houston for depositions	723.98
10/22/24		SR airfare from Los Angeles to Austin for depositions.	106.01
10/23/24		JH roundtrip airfare for travel to Houston for trial.	314.01
10/24/24		VO transporation in Texas for depositions.	43.65
10/24/24		VO transporation in Texas for depositions.	70.20
10/24/24		PB airfare from Los Angeles to Houston for depositions.	477.98
10/24/24		PB airfare from Houston to Dallas for depositions.	224.98
10/25/24		VO transporation in Texas for depositions.	189.53
10/25/24		VO transporation in Texas for depositions.	34.99
10/25/24		VO transporation in Texas for depositions.	31.11
10/25/24		PB airfare from Dallas to Los Angeles for depositions.	480.48
10/25/24		PB lodging in Houston for depositions.	583.31
10/26/24		JS airport parking while in Texas for depositions.	73.00
10/26/24		EB transporation in Texas for depositions.	59.70
10/26/24		VO lodging in Dallas for depositions.	1,401.60
10/26/24		VO transporation in Texas for depositions.	87.50

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Date	Task	Description	Amount
10/26/24		PB lodging in Dallas for depositions.	483.63
10/27/24		EB transporation in Texas for depositions.	37.18
10/28/24		BA transporation in Texas for depositions.	81.30
10/28/24		JS transporation in Texas for depositions.	35.65
10/28/24		JS hotel in Texas for depostions.	380.53
10/28/24		VO hotel for deposition prep in Houston.	147.89
10/29/24		EB transportation in Texas for depositions.	102.33
10/29/24		BA hotel for Houston depositions.	767.14
10/29/24		VO hotel in Houston for depositions.	145.89
10/29/24		VO parking for depostions in Houston.	34.65
10/29/24		Vendor fee for deposition of B. Gibson.	3,525.80
10/29/24		Vendor fee for videography services for deposition of Tiffany Lewis.	699.00
10/29/24		Transcript with Index of Eric N Brown.	2,781.35
10/29/24		Vendor fee for videography services for the deposition of Eric N Brown.	689.00
10/30/24		EB hotel in Texas for depostions.	1,394.54
10/30/24		BA transporation for depostions and trial.	270.02
10/30/24		VO hotel in Austin for depositions.	458.63
10/30/24		VO airfare from Austin to Santa Ana.	99.00
10/30/24		VO parking for depositions in Houston.	13.99
10/30/24		VO car rental for depositions in Houston and Austin.	598.43
10/30/24		BA airfare from HOU to DAL for deposition.	249.98
10/31/24		BA airfare to Houston for depositions.	364.48
10/31/24		BA airport parking for depositions.	48.00
11/01/24		BA hotel in Dallas for depositions.	1,275.64
11/01/24		Logikcull - EDiscovery (November 2024).	2,646.00
11/01/24		Vendor fee for deposition of S. Siddiqi.	2,576.55
11/01/24		Charles S Griffey - October 2024 services.	72,600.00
11/01/24		Vendor fee for expedited transcripts with index of Tiffany Lewis.	2,597.90
11/02/24		BA airfare to Houston for trial.	1,086.36
11/03/24		JS airfare from Houston to SD from trial.	461.99
11/04/24		JS airfare from SD to Houston for trial.	498.47
11/05/24		Fulcrum additional retainer.	18,000.00
11/06/24		PB flight from LAX to HOU for trial.	542.46

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Date	Task	Description	Amount
11/06/24		The Lancaster Hotel room block for trial.	131,734.24
11/06/24		Vendor fee for deposition cancellation of R. Peters.	500.00
11/07/24		BA airfare to VT from Houston for trial.	647.97
11/07/24		VO airfare from LB to HOU for trial.	583.98
11/07/24		AA airfare from BOS to HOU for trial.	398.98
11/08/24		JS transportation in Texas for trial.	324.57
11/08/24		VO transportation in Houston for trial.	277.66
11/08/24		CH airfare from HOU to LAS.	100.01
11/08/24		Vendor fee for expedited transcritp with index of Brendan Cottrell.	2,960.90
11/08/24		Vendor fee for expedited transcript with index of Nathan Nichols.	4,664.35
11/08/24		Vendor fee for videography services for the deposition of Brendan Cottrell.	749.00
11/08/24		Vendor fee for videography services for the deposition of Nathan Nichols.	1,449.00
11/11/24		PB flight from HOU to LAX.	453.98
11/12/24		JH flight from HOU to LAX.	438.48
11/12/24		SR lodging for depoisition in Houston.	998.55
11/12/24		SR transportaion while Houston for deposition.	173.70
11/13/24		AA airfare from HOU to BOS for trial.	263.48
11/15/24		VO airfare from HOU to Santa Ana.	496.47
11/15/24		Vendor fee for videography services for the deposition of Alex Peloubet.	749.00
11/15/24		Vendor fee for expedited transcript with index of Alex Peloubet.	2,678.90
11/16/24		BA airport parking while at trial.	115.00
11/18/24		Vendor fee for expedited heating transcript day 4.	8,227.20
11/18/24		Vendor fee for expedited heating transcript day 1.	7,799.25
11/18/24		Vendor fee for expedited heating transcript day 2.	8,601.70
11/18/24		Vendor fee for expedited heating transcript day 3.	8,821.00
11/18/24		Vendor fee transcript in support of the Rhodium-Whinstone dispute.	51.30
11/18/24		AA transporation in Texas for depositions.	84.24
11/18/24		PB transporation in Texas for depositions.	826.75
11/18/24		HM airfare SD Houston to SD for trial.	588.94
11/18/24		HM transporation in Texas for Trail.	182.61
11/18/24		CH transportation in Texas for depositions.	99.44

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Date	Task	Description	Amount
11/20/24		E. Brown invoice for deposition prep, deposition attendance and retainer for trial.	25,488.25
11/21/24		StoneTurn - Professional services rendered in October 2024.	18,577.50
11/25/24		Fulcrum Legal Graphics - Professional services rendered September 16 - October 16, 2024.	1,227.10
11/30/24		JND Discovery Invoice for November 2024.	3,765.00
11/30/24		Transportaion for JH while in Houston for trial.	58.81
12/01/24		Peregrine Consultants - Novemeber 2024.	16,350.00
		TOTAL EXPENSES ADVANCED	**$ 378,889.12**
		TOTAL THIS INVOICE	**$ 1,183,151.62**

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OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14249	11/01/24	79,868.00	63,894.40	15,973.60
14263	11/04/24	1,139,238.00	918,737.10	220,500.90
14269	11/14/24	1,632,686.25	1,329,529.25	303,157.00

Previous Balance	$ 539,631.50
Balance Due This Invoice	$ 1,183,151.62
TOTAL BALANCE DUE	**$ 1,722,783.12**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 539,631.50	$ .00	$ .00	$ .00	$ 539,631.50

Stris

December 19, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14331
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through November 30, 2024

RE: Retention and Fee Applications

Total Professional Services	$ 46,190.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 46,190.00**
Previous Balance	$ 12,030.00
TOTAL BALANCE DUE	**$ 58,220.00**

Electronic Invoice

Invoice # 14331 December 19, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
11/01/24	PS	Review draft fee statement and confer with EB regarding same.	.30	1250.00	375.00
11/01/24	EB	Continue preparing, conferring with PS regarding, and advising NC regarding portions of August fee statement.	.50	1100.00	550.00
11/01/24	CHH	Update draft fee statement per instructions from PS and EB.	.40	325.00	130.00
11/04/24	PS	Review updated draft fee statement and confer with team regarding revisions to same.	.40	1250.00	500.00
11/04/24	EB	Advise ASA regarding revisions to August and begin preparing September portions of fee statement.	4.10	1100.00	4,510.00
11/04/24	ASA	Assist EB with preparation of August portion of fee statement.	.90	325.00	292.50
11/05/24	VO	Review, confer with PS about, and revise first monthly fee application (2.7); prepare email to B. Howell regarding same (0.1).	2.80	875.00	2,450.00
11/05/24	PS	Review fee statement and confer with VO regarding same.	.50	1250.00	625.00
11/05/24	EB	Continue preparing September portions of monthly fee statement.	6.50	1100.00	7,150.00
11/05/24	CHH	Continue assisting with prepartion of monthly fee statement.	.50	325.00	162.50
11/08/24	EB	Begin working on October fee statement.	1.00	1100.00	1,100.00
11/12/24	EB	Continue preparing portions of October fee statement.	6.20	1100.00	6,820.00
11/13/24	EB	Continue preparing portions of October fee statement.	1.80	1100.00	1,980.00
11/14/24	EB	Continue preparing portions of October fee statement (3.9); review order and correspond with B. Rice and B. Howell regarding client inquiry concerning ordinary course declarations (0.2).	4.10	1100.00	4,510.00
11/15/24	EB	Advise NC regarding October fee statement (0.2); review, revise, and continue preparing portions of same (3.0).	3.20	1100.00	3,520.00
11/15/24	NC	Continue assisting EB with preparation of portions of October monthly fee statement.	1.20	325.00	390.00
11/18/24	EB	Continue preparing portions of October fee statement.	2.50	1100.00	2,750.00

Stris & Maher LLP

Invoice # 14331 December 19, 2024

Date	Tkpr	Description	Hours	Rate	Amount
11/19/24	EB	Continue preparing portions of October fee statement (2.4); advise ASA regarding same (0.2).	2.60	1100.00	2,860.00
11/19/24	ASA	Assist EB with preparation of portions of October fee statement.	2.50	325.00	812.50
11/20/24	EB	Revise portions from ASA and continue preparing portions of October fee statement.	1.00	1100.00	1,100.00
11/21/24	VO	Review and revise second monthly fee application.	1.10	875.00	962.50
11/25/24	EB	Begin preparing portions of November fee statement.	1.40	1100.00	1,540.00
11/26/24	EB	Continue preparing portion of November fee statement.	1.00	1100.00	1,100.00
		TOTAL PROFESSIONAL SERVICES			**$ 46,190.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	1.20	1,250.00	1,500.00
Elizabeth Brannen	EB	Partner	35.90	1,100.00	39,490.00
Victor O'Connell	VO	Partner	3.90	875.00	3,412.50
Andrew Atsalis	ASA	Fellow	3.40	325.00	1,105.00
Cynthia Huang	CHH	Fellow	.90	325.00	292.50
Nicholas Capalbo	NC	Fellow	1.20	325.00	390.00
Total			**46.50**		**$ 46,190.00**

TOTAL THIS INVOICE **$ 46,190.00**

Invoice # 14331 December 19, 2024

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14261	11/04/24	47,165.00	37,732.00	9,433.00
14284	11/14/24	12,985.00	10,388.00	2,597.00

Previous Balance	$ 12,030.00
Balance Due This Invoice	$ 46,190.00
TOTAL BALANCE DUE	**$ 58,220.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 12,030.00	$ .00	$ .00	$ .00	$ 12,030.00

Stris

December 19, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14332
Client # 00346
Matter # 008

INVOICE SUMMARY

For professional services rendered through November 30, 2024

RE: Non-working Travel for Whinstone Dispute

Total Professional Services	$ 63,785.00
50% discount	$ -31,892.50
Net Professional Services	$ 31,892.50
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 31,892.50**
Previous Balance	$ 6,829.25
TOTAL BALANCE DUE	**$ 38,721.75**

Electronic Invoice

Stris & Maher LLP

Invoice # 14332 December 19, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
11/01/24	BA	Travel Dallas to Dulles, part of return trip from depositions of T. Lewis and J. Matthews.	3.00	1050.00	3,150.00
11/07/24	VO	Travel LGB - HOU for pretrial conference and trial.	5.20	875.00	4,550.00
11/07/24	BA	Travel from Montpelier VT to Houston Texas for trial.	4.70	1050.00	4,935.00
11/07/24	JS	Travel to Houston for trial.	5.10	875.00	4,462.50
11/07/24	CHH	Travel from LAS to HOU.	6.00	325.00	1,950.00
11/07/24	JH	Travel from LAX to HOU for trial.	5.00	325.00	1,625.00
11/07/24	PB	Travel to Houston for trial.	4.30	725.00	3,117.50
11/07/24	ASA	Travel from BOS to IAH for trial.	8.00	325.00	2,600.00
11/07/24	HM	Travel from SAN to IAH for trial.	6.50	600.00	3,900.00
11/15/24	VO	Travel HOU-SNA.	5.50	875.00	4,812.50
11/15/24	JS	Travel home from Houston following trial.	4.80	875.00	4,200.00
11/15/24	PB	Return travel from trial.	6.80	725.00	4,930.00
11/16/24	BA	Travel back to Montpelier VT from Houston Texas following Whinstone trial.	8.50	1050.00	8,925.00
11/16/24	CHH	Travel from HOU to LAS.	6.20	325.00	2,015.00
11/16/24	JH	Travel home to Los Angeles from Houston bankruptcy trial.	6.00	325.00	1,950.00
11/16/24	ASA	Travel back to Massachusetts from Houston, Texas following Whinstone trial.	8.50	325.00	2,762.50
11/16/24	HM	Travel from IAH to SAN.	6.50	600.00	3,900.00

TOTAL PROFESSIONAL SERVICES	**$ 63,785.00**
50% discount	$ -31,892.50
NET PROFESSIONAL SERVICES	**$ 31,892.50**

Stris & Maher LLP

Invoice # 14332 December 19, 2024

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Bridget Asay	BA	Partner	16.20	1,050.00	17,010.00
Victor O'Connell	VO	Partner	10.70	875.00	9,362.50
John Stokes	JS	Partner	9.90	875.00	8,662.50
Peter Brody	PB	Associate	11.10	725.00	8,047.50
Helen Marsh	HM	Associate	13.00	600.00	7,800.00
Andrew Atsalis	ASA	Fellow	16.50	325.00	5,362.50
Cynthia Huang	CHH	Fellow	12.20	325.00	3,965.00
Jaida Hodge-Adams	JH	Fellow	11.00	325.00	3,575.00
Total			**100.60**		**$ 63,785.00**

TOTAL THIS INVOICE **$ 31,892.50**

Stris & Maher LLP

Invoice # 14332 December 19, 2024

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14295	11/14/24	34,146.25	27,317.00	6,829.25

Previous Balance	$ 6,829.25
Balance Due This Invoice	$ 31,892.50
TOTAL BALANCE DUE	**$ 38,721.75**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 6,829.25	$ .00	$ .00	$ .00	$ 6,829.25

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 THIRD MONTHLY FEE STATEMENT
FOR THE PERIOD DECEMBER 1, 2024, THROUGH DECEMBER 31, 2024

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 December 1, 2024 through December 31, 2024 (the "Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $117,981.80 (80% of the services rendered), plus $31,592.25 (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.

[1] 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 (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 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;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (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 (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 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 (ha.nguyen@usdoj.gov), 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 21st day of January, 2025.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
Patricia B. Tomasco (SBN 01797600)
Joanna D. Caytas (SBN 24127230)
Cameron Kelly (SBN 24120936)
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Email: razmigizakelian@quinnemanuel.com

-and-

STRIS & MAHER LLP

Peter K. Stris (pro hac vice)
Victor O'Connell (pro hac vice)
John Stokes (pro hac vice)
Peter Brody (pro hac vice)
Helen Marsh (pro hac vice)

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-and-

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todd@lkcfirm.com
alexis@lkcfirm.com
408 W. 11th Street, 5th Floor
Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on January 21, 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

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	11.70	$8,990.00	$7,192.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	144.00	$132,202.25	$105,761.80
007	Retention and Fee Applications	6.00	$6,285.00	$5,028.00
Total		161.7	$147,477.25	$117,981.80

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,100.00	6.60	$7,260.00
Bridget Asay	Partner	1997	$1,050.00	.10	$105.00
Andrew Atsalis	Litigation Fellow	N/A	$325.00	5.00	$1,625.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,100.00	6.50	$7,150.00
Bridget Asay	Partner	1997	$1,050.00	17.40	$18,270.00
Victor O'Connell	Partner	2012	$875.00	5.00	$4,375.00
John Stokes	Partner	2016	$875.00	44.10	$38,587.50
Colleen Smith	Associate	2015	$725.00	14.10	$10,222.50
Peter Brody	Associate	2016	$725.00	3.00	$2,175.00
Helen Marsh	Associate	2024	$600.00	22.10	$13,260.00
Andrew Atsalis	Litigation Fellow	N/A	$325.00	5.60	$1,820.00
Cynthia Huang	Litigation Fellow	N/A	$325.00	7.80	$2,535.00
Jaida Hodge-Adams	Litigation Fellow	N/A	$325.00	18.40	$5,980.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,100.00	4.60	$5,060.00
Victor O'Connell	Partner	2012	$875.00	1.40	$1,225.00

EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
E-discovery platform fees	$3,765.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
E-discovery platform fees	$1,976.00
Expert fees	$25,851.25
Total	$27,827.25

Stris

January 13, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14380
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through December 31, 2024

RE: Midas Green Litigation

Total Professional Services	$ 8,990.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 8,990.00**
Previous Balance	$ 4,926.00
TOTAL BALANCE DUE	**$ 13,916.00**

Electronic Invoice

Invoice # 14380 January 13, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
12/06/24	EB	Review and analyze motion to lift bankruptcy stay to permit resolution of patent case (0.4); correspond with R. Harrington (0.1) and confer with P. Tomasco and R. Harrington (0.2) and Texas counsel (0.2) regarding same.	.90	1100.00	990.00
12/08/24	EB	Review materials in support of request for entry of summary judgment order.	.10	1100.00	110.00
12/09/24	EB	Review and respond to correspondence from Texas counsel regarding steps to seek entry of summary judgment order.	.10	1100.00	110.00
12/10/24	EB	Correspond with R. Harrington regarding proposed revisions to motion to lift stay to permit entry of judgment and next steps in support of same.	.80	1100.00	880.00
12/16/24	BA	Review proposed motion to lift stay in Midas Green litigation and correspond with EB regarding same.	.10	1050.00	105.00
12/17/24	EB	Correspond with [redacted] regarding [redacted].	.10	1100.00	110.00
12/19/24	EB	Correspond with co-counsel R. Harrington regarding status of bankruptcy court submission requesting to lift stay.	.50	1100.00	550.00
12/20/24	EB	Correspond with R. Harrington and Texas counsel regarding submissions to bankruptcy and district courts to request written ruling on summary judgment order (0.8); advise NC and MN regarding draft motion and proposed order seeking same (0.4).	1.20	1100.00	1,320.00
12/23/24	EB	Review draft motion and proposed order asking district court to enter summary judgment order (0.1); advise MN regarding revisions to same (0.2).	.30	1100.00	330.00
12/27/24	EB	Continue revising and drafting portions of motion for order on summary judgment (1.3); review supporting research from ASA (0.1); advise ASA regarding further revisions in light of same (0.2).	1.60	1100.00	1,760.00
12/27/24	ASA	Conducting research and review relevant transcript material to assist EB with portions of motion for written summary judgment order.	2.00	325.00	650.00

Stris

January 13, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14366
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through December 31, 2024

RE: Whinstone Litigation

Total Professional Services	$ 104,375.00
Total Expenses Advanced	$ 27,827.25
TOTAL THIS INVOICE	**$ 132,202.25**
Previous Balance	$ 1,722,783.12
TOTAL BALANCE DUE	**$ 1,854,985.37**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Invoice # 14366 January 13, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
12/02/24	JH	Organize case materials including review and update of bankruptcy docket.	3.00	325.00	975.00
12/03/24	BA	Participate in portion of teleconference with potential [redacted] expert [redacted], with JS, W. Thompson, and A. Davis (0.5); participate in weekly client call with bankruptcy and litigation counsel (0.4); evaluate next steps (0.1).	1.00	1050.00	1,050.00
12/03/24	JS	Attend call with potential [redacted] expert (0.6); attend portion of weekly touch-point call (0.6); evaluate next steps in light of same (0.7).	1.90	875.00	1,662.50
12/03/24	JH	Continue organizing materials for phase 2 and updating bankruptcy docket.	2.00	325.00	650.00
12/04/24	JS	Confer with W. Thompson and J. Cohn regarding timing and strategy for [redacted] phase (0.5); review [redacted] agreements and evaluate same in connection with potential [redacted] (1.7); confer with P. Tomasco regarding same (0.3).	2.50	875.00	2,187.50
12/04/24	CHH	Review and update matter docket.	.10	325.00	32.50
12/04/24	JH	No Charge - Update docket (0.5); review November 26 status conference hearing audio and transcript (2.5).	3.00	325.00	N/C
12/05/24	BA	Correspond with bankruptcy counsel and with JS and PB regarding proposed disclosure of [redacted] materials [redacted] to creditors' committee.	.30	1050.00	315.00
12/05/24	JS	Work on strategy for [redacted] of litigation.	1.90	875.00	1,662.50
12/05/24	CHH	Review and update matter review and update matter docket.	.20	325.00	65.00
12/05/24	JH	No Charge - Update bankruptcy docket.	1.40	325.00	N/C
12/05/24	ASA	Organize case materials including audio files received from court.	.20	325.00	65.00
12/06/24	BA	Participate in teleconference with JS, W. Thompson, A. Davis, and potential [redacted] expert for [redacted] (0.7); correspond with JS and EB regarding potential additional [redacted] modeling by [redacted] (0.1).	.80	1050.00	840.00

Stris & Maher LLP

Invoice # 14366 January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/06/24	JH	Update bankruptcy docket.	.80	325.00	260.00
12/06/24	EZ	No Charge - Update Bankruptcy docket (1.0).	1.00	325.00	N/C
12/09/24	EB	Attention to case management.	.40	1100.00	440.00
12/09/24	BA	Review and correspond with litigation team regarding revisions to materials for [redacted] (0.7); review and manage response to request from bankruptcy counsel regarding sharing of [redacted] materials in compliance with protective order requirements (0.4).	1.10	1050.00	1,155.00
12/09/24	JS	Review, evaluate, and prepare correspondence regarding [redacted] in relation to Whinstone litigation.	2.40	875.00	2,100.00
12/09/24	HM	Advise and assist CHH to compile [redacted] and corresponding [redacted] for creditors' counsel.	1.10	600.00	660.00
12/10/24	JS	Further review and revise slides regarding [redacted].	.90	875.00	787.50
12/10/24	CHH	Compile and edit [redacted] for creditors' committee's review.	1.50	325.00	487.50
12/10/24	HM	Advise and assist CHH to compile deposition exhibits for creditors' counsel.	.50	600.00	300.00
12/11/24	EB	Correspond with JS and BA regarding additional analysis by [redacted] (0.1); attend teleconference with [redacted] regarding same (0.1).	.20	1100.00	220.00
12/11/24	BA	Correspond with JS, W. Thompson, J. Cohn, and A. Davis regarding [redacted] expert (0.1); correspond with EB and JS regarding next steps for additional [redacted] from [redacted] (0.2).	.30	1050.00	315.00
12/11/24	JS	Further evaluate next steps on [redacted] phase of case (1.3); further review slides and email regarding [redacted] (0.6).	1.90	875.00	1,662.50
12/11/24	CHH	Continue compiling [redacted] materials for creditors' counsel.	5.00	325.00	1,625.00
12/11/24	JH	Update bankruptcy docket.	2.30	325.00	747.50
12/11/24	ASA	Update internal memoranda regarding additional developments.	1.00	325.00	325.00

Stris & Maher LLP

Invoice # 14366 January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/11/24	HM	Attention to documents collected for creditors' counsel (2.0); coordinate with Todd Stefan of Setec Investigations and [redacted] to transfer [redacted] data to [redacted] (0.4).	2.40	600.00	1,440.00
12/12/24	EB	Correspond with BA and [redacted] regarding teleconference to discuss information in support of [redacted] analysis (0.1); correspond with [redacted] and [redacted] regarding same (0.1).	.20	1100.00	220.00
12/13/24	EB	Prepare for (0.5) and attend (0.4) teleconference with BA, ASA, and [redacted] to discuss information in support of [redacted] analysis; attention to resulting action items including correspondence to client regarding open questions (0.3).	1.20	1100.00	1,320.00
12/13/24	BA	Prepare for (0.2) and attend teleconference with [redacted], EB, BA, and ASA regarding information in support of [redacted] analysis (0.3); correspond with JS and team regarding sharing [redacted] (0.1).	.60	1050.00	630.00
12/13/24	JS	Work on 50(b) opposition.	8.00	875.00	7,000.00
12/13/24	ASA	Attend teleconference with [redacted], EB, and BA regarding information in support of [redacted] analysis (0.3); refine and circulate notes from call (0.1); confirm confidentiality of relevant documents to discuss with client (0.5).	.90	325.00	292.50
12/16/24	EB	Prepare for (0.5) and attend (0.6) teleconference with BA, ASA, [redacted] and [redacted] regarding information in support of [redacted] analysis; attention to resulting action items (0.2); review correspondence regarding and begin reviewing interim order on motion to assume (0.2)	1.50	1100.00	1,650.00
12/16/24	BA	Attend call with EB, BA, ASA, [redacted] and expert [redacted] regarding information in support of [redacted] analysis (0.6).	.60	1050.00	630.00
12/16/24	JS	Attention to high-priority action items in connection with phase two [redacted].	3.30	875.00	2,887.50
12/16/24	CS	Review and analyze bankruptcy court order on phase 1 of motion to assume executory contracts.	1.00	725.00	725.00
12/16/24	JH	Update bankruptcy docket.	1.00	325.00	325.00

Invoice # 14366 January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/16/24	PB	Review and analyze bankruptcy court trial order.	1.20	725.00	870.00
12/16/24	ASA	Attend call with EB, BA, [redacted] and expert [redacted] regarding information in support of [redacted] analysis (0.6); draft and circulate notes (0.4); create shared folder and link to facilitate upload of material by client (0.3).	1.30	325.00	422.50
12/16/24	HM	Review and analyze interim order on phase 1 of the motion to assume.	2.00	600.00	1,200.00
12/17/24	BA	Correspond with bankruptcy counsel regarding [redacted] for sharing with creditors committee, and correspond with JHA and HM to direct preparation of same (0.3); review court's phase 1 ruling (0.8).	1.10	1050.00	1,155.00
12/17/24	JS	Review and evaluate research issues and strategy in connection with phase two [redacted].	2.00	875.00	1,750.00
12/18/24	EB	Attend teleconference with BA and JS regarding status and high priority action items in support of phase two [redacted] claim (0.5); attend teleconference with JS, CS, PB and HM regarding research and high priority action items [redacted] (0.4); correspond with ASA and [redacted] regarding information in support of [redacted] analysis (0.1).	1.00	1100.00	1,100.00
12/18/24	BA	Confer with JS and EB regarding priority action items including [redacted] and [redacted] analyses.	.50	1050.00	525.00
12/18/24	JS	Review and evaluate order on phase 1 and high-priority action items in connection with phase two and [redacted] (3.2); attend teleconferences with EB and BA (0.5) and EB, CS, PB, and HM (0.4) regarding same.	4.10	875.00	3,587.50
12/18/24	CS	Teleconference with EB, HM, JS, HM, and PB regarding research and high priority action items [redacted] (0.4).	.40	725.00	290.00
12/18/24	JH	Prepare materials for Quinn Emmanuel co-counsel [redacted] at HM request.	5.00	325.00	1,625.00
12/18/24	PB	Teleconference with EB, JS, CS, and HM regarding research projects and high-priority action items.	.40	725.00	290.00

Invoice # 14366 January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/18/24	ASA	No Charge - Review and analyze bankruptcy court order on phase 1 of motion to assume executory contracts (0.9).	.90	325.00	N/C
12/18/24	HM	Teleconference with EB, JS, CS, and PB regarding research and high priority action items in support of [redacted] (0.4); coordinate with JHA to collect, quality check, and send [redacted] to creditors' counsel (3.1).	3.50	600.00	2,100.00
12/19/24	VO	Confer with [redacted] regarding materials including [redacted] update and drafting of notice [redacted] (0.1); prepare same (1.9); emails with team regarding same and incorporate team comments (0.3); review [redacted] contract and prepare draft notice [redacted] (0.4); emails with PB regarding same (0.1).	2.80	875.00	2,450.00
12/19/24	EB	Review documentation from [redacted] (0.1); advise ASA regarding analysis of and questions concerning same (0.1).	.20	1100.00	220.00
12/19/24	BA	Review and revise draft materials regarding phase 1 and correspond with JS regarding same (0.2); review email from Whinstone's counsel regarding conferral for phase 2, correspond with JS regarding same, and propose draft response to same to litigation team (0.4); correspond with JS, PB, and HM regarding support for co-counsel response to creditors' committee request for information (0.3); review correspondence with [redacted] and P. Brody regarding technical steps for upcoming production (0.2).	1.10	1050.00	1,155.00
12/19/24	JS	Further evaluate high priority research issues in connection with phase two [redacted].	1.50	875.00	1,312.50
12/19/24	ASA	Analyze updated [redacted] spreadsheet, summarize updates for EB and BA, and provide spreadsheet to [redacted].	2.00	325.00	650.00
12/19/24	HM	Conduct research for [redacted] case (4.2); review and respond to team correspondence regarding materials provided to creditors' counsel (0.5).	4.70	600.00	2,820.00
12/20/24	VO	Review, comment, and correspond with client representatives regarding phase 1 update materials.	.40	875.00	350.00
12/20/24	VO	Correspond with PB regarding notice to begin services [redacted].	.10	875.00	87.50

Invoice # 14366 January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/20/24	EB	Confer with PB regarding action items in support of [redacted] phase (0.1); correspond with BA and JS regarding same (0.1); correspond with [redacted], BA and ASA regarding additional documentation and advise ASA regarding provision of same to [redacted] (0.2); review research updates from HM (0.2).	.60	1100.00	660.00
12/20/24	BA	Review and analyze phase one decision with respect to strategy and options for phase 2 (3.5); correspond with JS, [redacted], and [redacted] regarding response to Whinstone's counsel regarding phase 2 conferral, and revise and send same to Whinstone's counsel (0.4); correspond with EB regarding data for [redacted] (0.1).	4.00	1050.00	4,200.00
12/20/24	CS	Review and analyze Texas law regarding [redacted] in contract disputes [redacted].	5.90	725.00	4,277.50
12/20/24	ASA	Share updated [redacted] spreadsheet with expert [redacted] via secure link.	.20	325.00	65.00
12/20/24	HM	Conduct research for [redacted] case.	2.60	600.00	1,560.00
12/21/24	HM	Continue research for [redacted] case.	2.70	600.00	1,620.00
12/23/24	BA	Continue reviewing and analyzing phase one decision and correspond with JS regarding same (1.0); review research from HM and PB regarding [redacted] issues related to [redacted] and further research same (1.0); review correspondence from Whinstone's counsel regarding phase 2 and correspond with JS and PB regarding same (0.2); review correspondence from [redacted] regarding client matter, confer with JS regarding same, and propose edits to potential [redacted] communication (0.5).	2.70	1050.00	2,835.00
12/23/24	JS	Attention to high-priority action items in connection with phase two [redacted].	5.50	875.00	4,812.50
12/23/24	CS	Continue reviewing and analyzing Texas law regarding [redacted] in contract disputes [redacted].	3.70	725.00	2,682.50
12/23/24	PB	Correspondence regarding questions from counsel for special committee.	.30	725.00	217.50

Invoice # 14366 January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/24/24	CS	Continue reviewing and analyzing Texas law regarding [redacted] in contract disputes [redacted].	3.10	725.00	2,247.50
12/26/24	VO	Finalize and submit [redacted] (0.5); confer with Rhodium legal counsel regarding same (0.1); emails with client regarding same (0.1).	.70	875.00	612.50
12/26/24	BA	Correspond with bankruptcy counsel regarding disclosures to creditors' committee.	.30	1050.00	315.00
12/26/24	JS	Review and evaluate [redacted] memoranda and next steps on same in connection with phase two [redacted].	2.80	875.00	2,450.00
12/26/24	JH	Update bankruptcy docket and review ongoing correspondence.	3.50	325.00	1,137.50
12/27/24	BA	Continue researching issues relating to [redacted] and correspond with JS regarding same; (1.5); review and revise proposed response to opposing counsel regarding phase 2, correspond with JS regarding same, and convey response to opposing counsel (0.4); correspond with VO regarding availability of trial transcripts (0.1).	1.90	1050.00	1,995.00
12/27/24	JS	Further evaluate research and discovery issues in connection with phase two [redacted].	1.00	875.00	875.00
12/27/24	JH	Send bankruptcy trial transcripts to VO.	.80	325.00	260.00
12/27/24	PB	Research regarding [redacted] clauses.	1.10	725.00	797.50
12/30/24	VO	Confer with JS regarding planning for Phase 2 (0.5); further confer with JS and EB regarding same (0.5).	1.00	875.00	875.00
12/30/24	EB	Confer with VO and JS regarding high priority action items in support of phase 2 [redacted] (0.5); confer with BA regarding expert-related action items in support of same (0.1); correspond with HM regarding [redacted] memorandum (0.2); correspond with CS regarding revisions to [redacted] expert deposition outline (0.1).	.90	1100.00	990.00

Invoice # 14366 January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/30/24	BA	Review correspondence from opposing counsel regarding case schedule and correspond with team regarding further response (0.3); review client inquiry regarding delivery of new miners and correspond with litigation team regarding response to same (0.2).	.50	1050.00	525.00
12/30/24	JS	Call with EB and VO regarding high priority action items for [redacted] (0.5); call with VO regarding high priority action items for [redacted] (0.5); review materials in connection with [redacted] (1.3).	2.30	875.00	2,012.50
12/31/24	EB	Correspond with BA and JS regarding analysis of [redacted] ancillary services charges (0.2); attention to case management (0.1).	.30	1100.00	330.00
12/31/24	BA	Correspond with litigation team regarding issues related to phase 2 and correspond with opposing counsel regarding same.	.60	1050.00	630.00
12/31/24	JS	Continue research in connection with high-priority action items in connection with [redacted] phase.	2.10	875.00	1,837.50
12/31/24	CHH	Prepare Imperium discovery uploads for transmission to [redacted].	1.00	325.00	325.00
12/31/24	HM	Conduct research for [redacted].	2.60	600.00	1,560.00
		TOTAL PROFESSIONAL SERVICES			**$ 104,375.00**

Invoice # 14366 January 13, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	6.50	1,100.00	7,150.00
Bridget Asay	BA	Partner	17.40	1,050.00	18,270.00
Victor O'Connell	VO	Partner	5.00	875.00	4,375.00
John Stokes	JS	Partner	44.10	875.00	38,587.50
Colleen Smith	CS	Associate	14.10	725.00	10,222.50
Peter Brody	PB	Associate	3.00	725.00	2,175.00
Helen Marsh	HM	Associate	22.10	600.00	13,260.00
Andrew Atsalis	ASA	Fellow	5.60	325.00	1,820.00
Cynthia Huang	CHH	Fellow	7.80	325.00	2,535.00
Jaida Hodge-Adams	JH	Fellow	18.40	325.00	5,980.00
Total			**144.00**		**$ 104,375.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
12/01/24		Logikcull December invoice.	1,976.00
12/20/24		StoneTurn Group - Professional services rendered for November 2024.	25,851.25
		TOTAL EXPENSES ADVANCED	**$ 27,827.25**
		TOTAL THIS INVOICE	**$ 132,202.25**

Invoice # 14366 January 13, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14249	11/01/24	79,868.00	63,894.40	15,973.60
14263	11/04/24	1,139,238.00	918,737.10	220,500.90
14269	11/14/24	1,632,686.25	1,329,529.25	303,157.00
14317	12/19/24	1,183,151.62	.00	1,183,151.62
		Previous Balance		$ 1,722,783.12
		Balance Due This Invoice		$ 132,202.25
		TOTAL BALANCE DUE		**$ 1,854,985.37**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
1,183,151.62	$ 303,157.00	$ 236,474.50	$ .00	$$.00	1,722,783.12

Invoice # 14380 January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/30/24	EB	Review updated drafts (0.1); advise ASA regarding further changes (0.1); and continue revising draft motion for entry of written order confirming grant of summary judgment (0.3).	.50	1100.00	550.00
12/30/24	ASA	Draft proposed order and portions of motion for written summary judgment order for EB and assist with revisions to same.	3.00	325.00	975.00
12/31/24	EB	Continue revising motion for entry of written summary judgment order.	.50	1100.00	550.00
		TOTAL PROFESSIONAL SERVICES			**$ 8,990.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	6.60	1,100.00	7,260.00
Bridget Asay	BA	Partner	.10	1,050.00	105.00
Andrew Atsalis	ASA	Fellow	5.00	325.00	1,625.00
Total			**11.70**		**$ 8,990.00**

TOTAL THIS INVOICE **$ 8,990.00**

Stris & Maher LLP

Invoice # 14380 January 13, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14251	11/01/24	855.00	684.00	171.00
14257	11/04/24	8,190.00	8,058.00	132.00
14283	11/14/24	4,755.00	4,557.00	198.00
14330	12/19/24	4,425.00	.00	4,425.00

Previous Balance	$ 4,926.00
Balance Due This Invoice	$ 8,990.00
TOTAL BALANCE DUE	**$ 13,916.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 4,425.00	$ 198.00	$ 303.00	$ .00	$ .00	$ 4,926.00

Stris

January 13, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14381
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through December 31, 2024

RE: Retention and Fee Applications

Total Professional Services	$ 6,285.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 6,285.00**
Previous Balance	$ 58,220.00
TOTAL BALANCE DUE	**$ 64,505.00**

Electronic Invoice

Invoice # 14381 January 13, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
12/13/24	EB	Continue preparing portions of November fee statement.	1.40	1100.00	1,540.00
12/17/24	EB	Continue preparing portions of November fee statement.	.90	1100.00	990.00
12/19/24	EB	Continue preparing portions of November fee statement.	2.30	1100.00	2,530.00
12/20/24	VO	Work on fee application.	1.40	875.00	1,225.00
		TOTAL PROFESSIONAL SERVICES			**$ 6,285.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	4.60	1,100.00	5,060.00
Victor O'Connell	VO	Partner	1.40	875.00	1,225.00
Total			**6.00**		**$ 6,285.00**

TOTAL THIS INVOICE **$ 6,285.00**

Stris & Maher LLP

Invoice # 14381 January 13, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14261	11/04/24	47,165.00	37,732.00	9,433.00
14284	11/14/24	12,985.00	10,388.00	2,597.00
14331	12/19/24	46,190.00	.00	46,190.00

Previous Balance	$ 58,220.00
Balance Due This Invoice	$ 6,285.00
TOTAL BALANCE DUE	**$ 64,505.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 46,190.00	$ 2,597.00	$ 9,433.00	$ .00	$ .00	$ 58,220.00

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 FIFTH MONTHLY FEE STATEMENT
FOR THE PERIOD JANUARY 1, 2025, THROUGH JANUARY 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 January 1, 2025 through January 31, 2025 (the "Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $531,962.00 (80% of the services rendered), plus $209,033.47 (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.

[1] 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 (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 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;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (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 (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 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 (ha.nguyen@usdoj.gov), 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 24th day of February, 2025.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
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-and-

STRIS & MAHER LLP

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408 W. 11th Street, 5th Floor
Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on February 24, 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

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	19.6	$21,615.00	$17,292.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	814.6	$634,762.50	$507,810.00
007	Retention and Fee Applications	8.3	$8575.00	$6,860.00
Total			$664,952.50	$531,962.00

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,250.00	11.90	$14,875.00
Bridget Asay	Partner	1997	$1,200.00	2.20	$2,640.00
Ken Halpern	Partner	1997	$1,100.00	2.90	$3,190.00
Andrew Atsalis	Litigation Fellow	N/A	$350.00	2.60	$910.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Peter Stris	Founding Partner	2001	$1,450.00	9.00	$13,050.00
Elizabeth Brannen	Managing Partner	2001	$1,250.00	72.80	$91,000.00
Bridget Asay	Partner	1997	$1,200.00	82.90	$99,480.00
Tillman Breckenridge	Partner	2003	$1,200.00	19.30	$23,160.00
Victor O'Connell	Partner	2012	$1,025.00	6.60	$6,765.00
John Stokes	Partner	2016	$1,025.00	80.40	$82,410.00
Colleen Smith	Associate	2015	$850.00	103.20	$87,720.00
Peter Brody	Associate	2016	$850.00	15.10	$12,835.00
Sarah Rahimi	Associate	2019	$750.00	80.00	$60,000.00
Helen Marsh	Associate	2024	$700.00	47.30	$33,110.00
Tanya Tice	Discovery Associate	1989	$525.00	115.50	$60,637.50
Monica Viramontes	Senior Paralegal	N/A	$425.00	9.60	$4,080.00
Andrew Atsalis	Litigation Fellow	N/A	$350.00	36.40	$12,740.00
Cynthia Huang	Litigation Fellow	N/A	$350.00	40.90	$14,315.00
Sebastian Delgado	Litigation Fellow	N/A	$350.00	.90	$315.00
Shayra Banta	Litigation Fellow	N/A	$350.00	23.20	$8,120.00
Nicholas Capalbo	Litigation Fellow	N/A	$350.00	25.40	$8,890.00
Jaida Hodge-Adams	Litigation Fellow	N/A	$350.00	46.10	$16,135.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,250.00	5.70	$7,125.00
Victor O'Connell	Partner	2012	$1,025.00	.80	$820.00
Nicholas Capalbo	Litigation Fellow	N/A	$350.00	1.80	$630.00

EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
E-discovery platform fees	$3,765.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
Printing for Phase 1 hearing	$6,687.77
Hotel accommodations for Phase 1 hearing	$30,919.21
Legal research	$116.49
Press release	$349.00
Litigation Support Vendors	$2,550.00
E-discovery platform fees	$2,646.00
Expert services for Phase 1 hearing	$162,000.00
Total	$205,268.47

EXHIBIT 4

Stris

February 21, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14471
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through January 31, 2025

RE: Midas Green Litigation

Total Professional Services	$ 21,615.00
Total Expenses Advanced	$ 3,765.00
TOTAL THIS INVOICE	**$ 25,380.00**
Previous Balance	$ 2,431.00
TOTAL BALANCE DUE	**$ 27,811.00**

Electronic Invoice

Invoice # 14471 February 21, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
1/02/25	EB	Revise motion for entry of written summary judgment order and proposed order in support of same (1.1); correspond with BA regarding same (0.1).	1.20	1250.00	1,500.00
1/02/25	BA	Begin reviewing proposed filings seeking entry of judgment upon lifting of stay.	.30	1200.00	360.00
1/03/25	EB	Review materials in support of revisions to motion requesting written summary judgment order (0.5); correspond with BA, KH, PB, and SR regarding information in support of revisions to same and updated draft motion to lift stay from bankruptcy counsel (0.5); review and analyze related analysis and correspondence from BA and KH (0.3); revise and propose further revisions to both motions and accompanying proposed orders (1.9); correspond with bankruptcy and Texas counsel regarding same (0.1).	3.30	1250.00	4,125.00
1/03/25	BA	Review, analyze, and edit proposed filings seeking lifting of bankruptcy stay and entry of judgment upon lifting of stay, and correspond with EB and KH regarding same.	1.90	1200.00	2,280.00
1/03/25	ASA	Assist EB with analysis of named defendants in support of motion to lift stay.	.20	350.00	70.00
1/04/25	KJH	Research injunction waiver and review and provide related and additional comments on draft motion to lift stay.	2.90	1100.00	3,190.00
1/06/25	EB	Review and analyze proposed revisions from Texas counsel (0.1); correspond with Texas counsel regarding same (0.1).	.20	1250.00	250.00
1/07/25	EB	Review and analyze revisions proposed by Texas counsel to district court submission to prepare for upcoming discussion (0.2); attend teleconference with Texas counsel regarding same and corresponding bankruptcy court submission (0.4); correspond with Texas counsel regarding draft bankruptcy court submission and potential further revisions to same and district court submission (0.1); correspond with litigation fellows and Texas counsel regarding Midas Green bankruptcy proofs of claim (0.1); begin reviewing same and providing information to bankruptcy counsel in support of objections to same (0.5).	1.30	1250.00	1,625.00

Stris & Maher LLP

Invoice # 14471 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/07/25	ASA	Review and circulate Midas Green proof of claim for EB.	1.70	350.00	595.00
1/08/25	EB	Advise ASA and MN regarding compilation of documents requested by bankruptcy counsel (0.3); review and provide same (0.2); correspond with bankruptcy counsel (0.3) and Texas counsel (0.1) regarding status and supporting analysis.	.90	1250.00	1,125.00
1/08/25	ASA	Collect redacted documents from docket to assist preparation of Motion to Lift Stay in bankruptcy court in coordination with EB and MN.	.70	350.00	245.00
1/13/25	EB	Correspond with [redacted] regarding preservation notice and update Texas counsel regarding anticipated timing.	.10	1250.00	125.00
1/17/25	EB	Review objection status and deadline.	.10	1250.00	125.00
1/21/25	EB	Attend teleconference with [redacted] regarding request to lift stay to permit entry of summary judgment order and related action items (0.2); begin preparing description of invalidity and inequitable conduct claims (0.5).	.70	1250.00	875.00
1/22/25	EB	Review materials regarding status of claims and prepare draft invalidity and inequitable conduct claim description (0.8); correspond with BA, JS, and VO regarding same (0.2); correspond with [redacted] regarding reminder preservation notice (0.1).	1.10	1250.00	1,375.00
1/23/25	EB	Correspond with [redacted] regarding [redacted].	.20	1250.00	250.00
1/30/25	EB	Review and update Texas counsel regarding order lifting stay (0.1); draft meet and confer correspondence to opposing counsel (0.1); revise motion for entry of written summary judgment order (1.9); review and update client and co-counsel regarding correspondence from district court clerk and proposed response to same (0.2).	2.30	1250.00	2,875.00
1/31/25	EB	Evaluate response to correspondence from district court clerk (0.3); correspond with [redacted] and bankruptcy counsel regarding same (0.1); correspond with Texas counsel regarding correspondence to district court clerk regarding bankruptcy order (0.1).	.50	1250.00	625.00
		TOTAL PROFESSIONAL SERVICES			**$ 21,615.00**

Invoice # 14471 February 21, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	11.90	1,250.00	14,875.00
Bridget Asay	BA	Partner	2.20	1,200.00	2,640.00
Ken Halpern	KJH	Partner	2.90	1,100.00	3,190.00
Andrew Atsalis	ASA	Fellow	2.60	350.00	910.00
Total			**19.60**		**$ 21,615.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
12/31/24		JND Discovery Invoice for December 2024.	3,765.00
		TOTAL EXPENSES ADVANCED	**$ 3,765.00**
		TOTAL THIS INVOICE	**$ 25,380.00**

Stris & Maher LLP

Invoice # 14471 February 21, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14251	11/01/24	855.00	684.00	171.00
14257	11/04/24	8,190.00	8,058.00	132.00
14283	11/14/24	4,755.00	4,557.00	198.00
14330	12/19/24	4,425.00	4,293.00	132.00
14380	1/13/25	8,990.00	7,192.00	1,798.00

Previous Balance	$ 2,431.00
Balance Due This Invoice	$ 25,380.00
TOTAL BALANCE DUE	**$ 27,811.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 1,798.00	$ 132.00	$ 501.00	$ .00	$ 2,431.00

Stris

February 21, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14459
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through January 31, 2025

RE: Whinstone Litigation

Total Professional Services	$ 634,762.50
Total Expenses Advanced	$ 205,268.47
TOTAL THIS INVOICE	**$ 840,030.97**
Previous Balance	$ 721,359.00
TOTAL BALANCE DUE	**$ 1,561,389.97**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Invoice # 14459 February 21, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
1/02/25	EB	Attention to case management.	.30	1250.00	375.00
1/02/25	JS	Assign and advise Stris team regarding high priority phase two and damages case research issues.	1.30	1025.00	1,332.50
1/02/25	HM	Continue conducting research for affirmative damages case.	4.60	700.00	3,220.00
1/03/25	VO	Confer with PS, EB, and JS regarding Phase 2 strategy and planning.	.90	1025.00	922.50
1/03/25	PS	Teleconference with EB, JS, and VO regarding phase two strategy and planning.	.90	1450.00	1,305.00
1/03/25	EB	Review update from HM regarding [redacted] research (0.2); attend teleconference with PS, VO, and JS regarding phase 2 strategy and planning (0.9); confer with BA and JS regarding expert-related action items in support of phase 2 and affirmative damages claim (0.8); correspond with PB, HM, MV and litigation fellows regarding text messages for TT analysis (0.1); prepare correspondence to TT regarding upcoming project in support of phase 2 trial preparation (0.1).	2.10	1250.00	2,625.00
1/03/25	BA	Confer with JS and EB regarding expert-related action items (0.8); correspond with [redacted] (0.1).	.90	1200.00	1,080.00
1/03/25	JS	Call with EB and BA regarding expert action items on phase two and damages case (0.8); call with EB, PS, and VO regarding phase two strategy and planning (0.9); evaluate high priority expert action items in relation to damages case and phase two (2.4).	4.10	1025.00	4,202.50
1/03/25	HM	Continue drafting damages-phase document review memorandum (0.7).	.70	700.00	490.00
1/04/25	EB	Prepare for (0.1) and attend (0.3) teleconference with BA and [redacted] regarding analysis in support of phase 2 [redacted]; confer with BA regarding resulting action items and other damages expert analysis for phase 2 (0.3).	.70	1250.00	875.00
1/04/25	BA	Prepare for meeting with [redacted] to discuss potential further analysis of [redacted] (0.3); participate in teleconference with [redacted] and EB to discuss same (0.3); confer with EB regarding expert-related action items (0.3).	.90	1200.00	1,080.00

Stris & Maher LLP

Invoice # 14459 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/05/25	BA	Review correspondence from expert [redacted] and correspond with [redacted] and JS and EB regarding next steps.	.20	1200.00	240.00
1/06/25	EB	Prepare for (0.1) and attend (0.4) teleconference with CS regarding [redacted] outline; attend teleconference with SR regarding action items in support of [redacted] analysis and phase 2 testimony (0.3).	.80	1250.00	1,000.00
1/06/25	JS	Correspond with client regarding status and next steps for phase two of assumption litigation (0.4); evaluate and advance expert and research action items for phase two and damages case (3.0).	3.40	1025.00	3,485.00
1/06/25	SR	Confer with EB regarding action items relating to [redacted] phase 2 and damages case.	.30	750.00	225.00
1/06/25	CS	Teleconference with EB to discuss [redacted] deposition outline (0.4); review and analyze [redacted] expert report (2.7).	3.10	850.00	2,635.00
1/06/25	HM	Continue drafting document review memorandum for damages and phase 2.	2.10	700.00	1,470.00
1/07/25	EB	Attend teleconference with BA, JS, and PB regarding damages claim and phase 2 document review memorandum and next steps in support of review (0.3); correspond with TT regarding action items in support of damages and phase 2 text message review (0.2)	.50	1250.00	625.00
1/07/25	BA	Correspond and confer with litigation team and P. Tomasco regarding lack of response from Whinstone's counsel regarding phase 2 and correspond with M. Thomas regarding same and intent to seek status conference (0.8); draft emergency motion for status conference, correspond with litigation team and P. Tomasco regarding edits to same and finalization of same, and correspond with B. Howell regarding finalization and filing of same (2.7); review response from M. Thomas regarding phase 2 and analysis of same from JS (0.2); attend meeting with EB, JS, and PB to discuss strategy for preparation for upcoming trial proceedings (0.3).	4.00	1200.00	4,800.00
1/07/25	JS	Attend meeting with BA, EB, and PB to discuss strategy for preparation for upcoming trial proceedings (0.3); review and evaluate memorandum regarding review for damages case (0.3); move forward high priority action items for phase 2 and damages case (3.3).	3.90	1025.00	3,997.50

Stris & Maher LLP

Invoice # 14459 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/07/25	SR	Begin reviewing materials to assist BA, EB, JS in [redacted] phase 2 and damages analysis.	6.10	750.00	4,575.00
1/07/25	CS	Review and analyze [redacted] reports in preparation for taking [redacted] deposition.	4.60	850.00	3,910.00
1/07/25	PB	Attend meeting with BA, EB, and JS to discuss strategy for preparation for upcoming trial proceedings.	.30	850.00	255.00
1/07/25	HM	Continue drafting damages-phase document review memorandum (2.2).	2.20	700.00	1,540.00
1/08/25	VO	Emails with client representatives and client's legal counsel regarding Whinstone objection to installation of miners (0.3); confer and correspond with JS and W. Thompson regarding same (1.1).	1.40	1025.00	1,435.00
1/08/25	EB	Review and correspond with BA, JS, PB, and HM regarding revisions to damages and phase 2 document review memorandum (0.7); prepare for (0.2) and attend (0.5) teleconference with TT regarding text message review and analysis in support of damages claim and phase 2; correspond with PB and HM regarding supporting action items (0.1).	1.50	1250.00	1,875.00
1/08/25	BA	Review correspondence between client and Whinstone regarding miner replacement and correspond with JS and litigation team regarding strategy for response to same (0.4); review draft review memorandum for damages phase and correspond with HM, EB, PB, and JS regarding strategy for and revisions to same (0.3); review draft notice of hearing and correspond with B. Howell regarding filing of same (0.1).	.80	1200.00	960.00
1/08/25	JS	Evaluate next steps and prepare correspondence and research regarding Whinstone refusal to cooperate with miner swap.	5.30	1025.00	5,432.50
1/08/25	SR	Continue reviewing materials to assist BA, EB, JS in [redacted] phase 2 and damages analysis.	6.50	750.00	4,875.00
1/08/25	CS	Continue reviewing and analyzing [redacted] reports and [redacted] report in preparation for [redacted] deposition.	6.30	850.00	5,355.00
1/08/25	PB	Review and revise draft memorandum regarding Phase 2 document analysis (1.2); teleconference with MV regarding Phase 2 preparation (0.2).	1.40	850.00	1,190.00

Invoice # 14459 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/08/25	TT	Review materials including draft memorandum from HM to prepare for hot document assessment for damages and phase 2 (0.7); confer with EB regarding phase two litigation and affirmative damages in support of hot document assessment (0.5); prepare summary and analysis of [redacted] texts in support of same (6.0).	7.20	525.00	3,780.00
1/09/25	VO	Attend conference call with client representatives and client's legal counsel regarding miner installation dispute (0.8); emails with client and team regarding same (0.5).	1.30	1025.00	1,332.50
1/09/25	EB	Review initial summary and analysis from TT regarding text message review (0.5); advise TT regarding revisions to same (0.2); prepare for (0.4) and attend (1.0) teleconference with BA, JS, SR, and [redacted] regarding [redacted] in support of phase 2; review further information from [redacted] (0.1); correspond with BA, JS, and SR regarding same (0.1).	2.30	1250.00	2,875.00
1/09/25	BA	Correspond with litigation team and client regarding Whinstone's refusal to cooperate in replacement of miners and response to same (0.6); participate in teleconference with litigation team, bankruptcy counsel, and client team to address Whinstone's refusal to cooperate in replacement of miners (0.5); correspond further with J. Cohn, W. Thompson, and JS regarding email to Whinstone's counsel regarding same, correspond and confer with JS regarding same, and email Whinstone's counsel regarding same (0.5); begin drafting emergency motion seeking status conference to address Whinstone's refusal to cooperate in replacement of miners (2); participate in teleconference with [redacted], EB, SR, and JS to discuss analysis of [redacted] as relevant to phase 2 and to affirmative damages claim (1).	4.60	1200.00	5,520.00
1/09/25	JS	Prepare emergency motion regarding Whinstone actions in connection with miner swap (3.5); evaluate strategy and next steps in connection with same (3.4); attend teleconference with BA, SR, EB, and [redacted] regarding [redacted] in connection with phase 2 and damages (1.0).	7.90	1025.00	8,097.50
1/09/25	SR	Attend videoconference with [redacted], EB, BA, JS to discuss phase 2 and damages analysis (1); continue reviewing materials in connection with the same (5.5).	6.50	750.00	4,875.00

Invoice # 14459 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/09/25	CS	Begin drafting outline for deposition of [redacted].	5.00	850.00	4,250.00
1/09/25	TT	Prepare summary and analysis of [redacted] texts in support of phase two litigation and affirmative damages hot document assessment (9.2)	9.20	525.00	4,830.00
1/10/25	VO	Emails with client and legal teams regarding new roadblocks from Whinstone regarding miner installation and Rhodium response to same (0.6); videoconference with client and legal teams regarding same (0.9).	1.50	1025.00	1,537.50
1/10/25	EB	Review and respond to team and client correspondence regarding status and high priority action items (0.1); attend teleconference with CS regarding [redacted] deposition [redacted] and [redacted] fact-gathering in support of same (0.1); attend teleconference with HM regarding discovery-related action items including revisions to review memorandum (0.1); begin reviewing and annotating materials in support of [redacted] damages and potential phase 2 analysis (1.0).	1.30	1250.00	1,625.00
1/10/25	BA	Correspond with [redacted] and P. Tomasco regarding deposition schedule (0.1); participate in teleconference with P. Tomasco, W. Thompson, J. Cohn, and JS to discuss preparation for status conference regarding phase 2 and issues related to miner replacement (1); participate in teleconference with A. Swartz, T. Disher, and [redacted] to discuss issues related to [redacted], correspond with litigation team regarding next steps with [redacted], and convey materials to A. Swartz related to same (0.6); correspond with litigation team and client team regarding Whinstone's refusal to cooperate with miner replacement and participate in teleconference with client team and litigation team regarding Whinstone's refusal to cooperate with miner replacement (1); correspond with JS and W. Thompson regarding Monday's status conference, review analysis of W. Thompson for same, correspond with JS, HM, and PB regarding analysis needed to prepare for same, and begin preparing for same (2).	4.70	1200.00	5,640.00
1/10/25	JS	Assist in preparation for status conference regarding phase 2 (5.3); attend teleconference with J. Cohn, W. Thompson, P. Tomasco, and BA regarding same (1.0).	6.30	1025.00	6,457.50
1/10/25	SR	Continue reviewing materials to assist BA, EB, JS in [redacted] phase 2 and damages analysis.	6.90	750.00	5,175.00

Invoice # 14459 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/10/25	CS	Meet with EB to discuss progress on [redacted] deposition outline (0.1); review and analyze articles and papers [redacted] (1.0); continue drafting outline for [redacted] deposition (6.5).	7.60	850.00	6,460.00
1/10/25	PB	Draft analysis of invoices submitted by Whinstone in support of potential Phase 2 litigation.	1.20	850.00	1,020.00
1/10/25	HM	Continue drafting phase 2 and affirmative damages claim document review memorandum (4.4); teleconference with EB about document review memorandum (0.1); assist BA and JS with emergency status conference preparation (1.5).	6.00	700.00	4,200.00
1/10/25	TT	Continue preparing summary and analysis of [redacted] texts in support of phase two litigation and affirmative damages hot document assessment.	9.10	525.00	4,777.50
1/11/25	EB	Review correspondence and propose revised response to correspondence from Whinstone (0.1); correspond with JS regarding same (0.1); attend teleconferences with [redacted] (0.1) and [redacted] (0.2) regarding same and related action items; correspond with BA and JS regarding updating of document preservation notice (0.1).	.60	1250.00	750.00
1/11/25	BA	Prepare for hearing on scope of phase 2, including review of pleadings and evidence (2.9); review prior document hold letter and correspond with EB regarding [redacted] (0.1); correspond with P. Tomasco, W. Thompson, and JS regarding deposition dates (0.1).	3.10	1200.00	3,720.00
1/11/25	JS	Assist in preparation for status conference regarding Phase II issues.	2.20	1025.00	2,255.00
1/11/25	CS	Continue drafting outline for deposition of [redacted].	1.70	850.00	1,445.00
1/12/25	BA	Prepare for status conference, including research, outline and slide preparation, review of pleadings, and correspondence with JS and P. Tomasco (3.5); correspond with opposing counsel regarding deposition schedule (0.1).	3.60	1200.00	4,320.00
1/12/25	CS	Continue drafting outline for deposition of [redacted].	.90	850.00	765.00
1/12/25	PB	Draft analysis of invoices in preparation for status conference regarding Phase 2.	1.50	850.00	1,275.00

Invoice # 14459 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/12/25	HM	Assist BA and JS with preparation for emergency status conference (0.4); continue drafting phase 2 and affirmative damages case document review memorandum (0.7).	1.10	700.00	770.00
1/12/25	TT	Continue preparing summary and analysis of [redacted] texts.	1.60	525.00	840.00
1/13/25	VO	Confer with JS and client legal counsel regarding [redacted] (0.2); emails with team and Rhodium regarding same (0.1); emails with JS and EB and confer with JS regarding analysis of [redacted] in connection with potential [redacted] (0.4).	.70	1025.00	717.50
1/13/25	EB	Correspond with [redacted], SR, and review and respond to team correspondence including TT, BA, JS, PB, and ASA regarding TT review of text messages (0.4); continue reviewing and annotating materials in support of [redacted], damages, and phase 2 analysis (1.5).	1.90	1250.00	2,375.00
1/13/25	BA	Prepare for and participate in status conference regarding scope of phase 2, including conferring with JS and corresponding with P. Tomasco regarding slide revisions (3.4); correspond with JS and team regarding follow up to status conference, and correspond with opposing counsel regarding same (0.2); correspond with JS and W. Thompson regarding proposed meet and confer, and correspond with [redacted], litigation team, and bankruptcy counsel regarding mediation [redacted] (0.2); review initial text message analysis and correspond with EB and JS regarding same (0.2).	4.00	1200.00	4,800.00
1/13/25	JS	Prepare for (0.3) and attend conference regarding phase II issues (0.5); confer with BA to prepare for same (0.5); evaluate and implement high priority action items in light of same (2.3); confer with CS regarding [redacted] deposition (0.2).	3.80	1025.00	3,895.00
1/13/25	CS	Listen to court hearing on need and subject of Phase II trial (0.7); meet with JS to discuss status of miner installation at Rockdale (0.2); review email communications related to the same (0.3); continue drafting outline for deposition of [redacted] (6.6).	7.80	850.00	6,630.00
1/13/25	PB	Attend hearing regarding schedule for trial phase two.	.50	850.00	425.00
1/13/25	HM	Continue drafting and revising phase 2 and affirmative damages case document review memorandum (1.5).	1.50	700.00	1,050.00

Invoice # 14459 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/13/25	TT	Continue preparing summary and analysis of [redacted] texts.	8.50	525.00	4,462.50
1/14/25	EB	Review and respond to team correspondence and correspond with Stris team members regarding high priority action items (0.4); update TB regarding [redacted] analysis request in support of [redacted] (0.1); continue analyzing and annotating materials in support of [redacted] damages and phase analysis (1.2); attend teleconference with SR regarding same (0.2); review draft report from client (0.1); attend teleconference with clients, JS, co-counsel, and [redacted] regarding next steps in the wake of same (0.4); attend portion of checkpoint teleconference with BA, JS, clients and co-counsel (0.5).	2.90	1250.00	3,625.00
1/14/25	BA	Attend strategy call with litigation team, bankruptcy team, and client team (0.4); correspond with JS regarding [redacted] issue raised by client (0.1); correspond with bankruptcy counsel regarding discovery information for [redacted] and correspond with PB regarding responses to same (0.3).	.80	1200.00	960.00
1/14/25	JS	Attend teleconferences regarding [redacted] (0.4) and weekly touchpoint (0.5); evaluate next steps for phase 2 and potential mediation in light of status conference (0.5).	1.40	1025.00	1,435.00
1/14/25	SR	Continue reviewing and analyzing material and begin drafting [redacted] in support of [redacted], damages, and expert analysis (4.3); attend teleconference with EB regarding the same (0.2).	4.50	750.00	3,375.00
1/14/25	TB	Call with EB to discuss contract question regarding [redacted].	.10	1200.00	120.00
1/14/25	CS	Continue drafting outline for [redacted] deposition.	5.30	850.00	4,505.00
1/14/25	NC	Schedule meeting for EB & SR; correspond with EB regarding same.	.10	350.00	35.00
1/14/25	PB	Revise analysis of produced invoices.	.30	850.00	255.00
1/14/25	HM	Revise phase 2 and affirmative damages case document review memorandum (1.5).	1.50	700.00	1,050.00
1/14/25	TT	Continue preparing summary and analysis of [redacted] texts.	8.30	525.00	4,357.50

Invoice # 14459 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/15/25	PS	Teleconference with EB regarding strategy (0.3); prepare for upcoming strategy team calls (1.9).	2.20	1450.00	3,190.00
1/15/25	EB	Continue analyzing and annotating information in support of [redacted] phase 2 and damages claims (3.0); correspond with Stris team members regarding status and phase 2 action items (0.5); attend teleconference with PS regarding high priority action items and matter strategy (0.3).	3.80	1250.00	4,750.00
1/15/25	BA	Correspond and confer with PB and JS regarding Whinstone/Riot invoices (0.4); prepare for meet and confer with opposing counsel, confer with JS regarding same, and participate in meet and confer with opposing counsel (0.8); correspond with PB regarding invoice analysis and review further analysis of unpaid invoices, and correspond with JS regarding strategy for addressing invoices disputes with court (0.4).	1.60	1200.00	1,920.00
1/15/25	JS	Confer with BA to prepare for meet and confer regarding mediation and phase 2 (0.2); attend meet and confer with opposing counsel and [redacted] regarding mediation and phase 2 (0.5); evaluate strategic next steps in connection with [redacted] issues (1.0); evaluate legal issues surrounding Whinstone invoice claims and [redacted] argument (2.5).	4.20	1025.00	4,305.00
1/15/25	SR	Continue reviewing and analyzing material and drafting notes in support of [redacted] claims, damages, and expert analysis.	8.60	750.00	6,450.00
1/15/25	CS	Continue drafting outline for deposition of [redacted]; review and analyze data and documents relevant to the same.	7.60	850.00	6,460.00
1/15/25	CHH	Review and circulate attachments to produced [redacted] messages for document review efforts.	.30	350.00	105.00
1/15/25	PB	Teleconference with BA and JS regarding invoice analysis (0.6); correspondence with BA and JS regarding same (0.5).	1.10	850.00	935.00
1/15/25	HM	Review and respond to team correspondence regarding phase 2 and affirmative damages case document review memorandum (0.2).	.20	700.00	140.00
1/15/25	TT	Continue preparing summary and analysis of [redacted] texts.	10.00	525.00	5,250.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/16/25	VO	Confer with PS, EB, and JS regarding litigation planning and strategy.	.80	1025.00	820.00
1/16/25	PS	Continue to prepare for (1.3) and attend (0.9) team meeting regarding high priority phase 2 and damages-related action items; attend further strategy teleconference with EB, JS, and VO (0.8).	3.00	1450.00	4,350.00
1/16/25	EB	Continue analyzing and annotating materials in support of [redacted] of phase 2 and damages claim (2.4); advise NC regarding memorandum in support of same (0.1); correspond with Stris team and co-counsel regarding high priority action items including response to client inquiry and potential correspondence to Whinstone (0.4); review update from and advise TT regarding next steps in support of text message analysis (0.1); prepare for (0.5), attend and lead (0.9) Stris team meeting regarding high priority phase 2 and damages-related action items, and attend further strategy teleconference with PS, JS, and VO (0.8).	5.20	1250.00	6,500.00
1/16/25	BA	Review and analyze invoice data to prepare for phase 2 and assist client with resolving disputed invoices, correspond with JS regarding same, correspond with A. Peloubet to seek additional information, and review further analysis from A. Peloubet (1.9); attend teleconference with PS, EB, JS, CS, SR, CHH, JHA, and ASA regarding strategic and high-priority Phase 2 action items (0.5); begin outlining phase 2 scope arguments (0.5); correspond and confer with JS and W. Thompson regarding analysis of [redacted] to Whinstone for [redacted] (0.7); correspond with litigation team regarding client request for advice on [redacted] report (0.1).	3.70	1200.00	4,440.00
1/16/25	JS	Attend teleconference with PS, EB, BA, CS, SR, CHH, JHA, and ASA regarding strategic and high-priority Phase 2 action items (0.9); attend teleconference with VO, EB, and PS regarding strategic and high-priority Phase 2 action items (0.8).	1.70	1025.00	1,742.50
1/16/25	SR	Attend teleconference with PS, EB, BA, JS, CS, CHH, JHA, and ASA regarding strategic and high-priority Phase 2 action items (0.9); continue reviewing and analyzing material and drafting notes in support of [redacted] claims, damages, and expert analysis (6.4).	7.40	750.00	5,550.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/16/25	TB	Conduct legal research and analysis regarding [redacted] for EB and JS.	3.70	1200.00	4,440.00
1/16/25	CS	Participate in teleconference with PS, EB, JS, BA, CH, AA, and JHA regarding Phase 2 pressing action items (0.5); continue drafting outline for deposition of [redacted] (4.7).	5.20	850.00	4,420.00
1/16/25	CHH	Prepare invoice document review set for Phase II (0.5); attend teleconference with PS, EB, BA, JS, CS, SR, JHA, and ASA regarding strategic and high-priority Phase 2 action items (0.9).	1.40	350.00	490.00
1/16/25	NC	Update [redacted] memorandum with [redacted].	.10	350.00	35.00
1/16/25	ASA	Attend teleconference with PS, EB, BA, JS, CS, SR, CHH, and JHA regarding strategic and high-priority Phase 2 action items.	.90	350.00	315.00
1/16/25	TT	Complete initial summary and analysis of [redacted] texts (2.0); repare summary and analysis of [redacted] texts in support of phase two and damages claims (8.9).	10.90	525.00	5,722.50
1/17/25	EB	Review update from TT and correspond with BA, JS, and ASA regarding additional text message analysis (0.2); attend teleconference with TT regarding next steps in support of same including review of embedded documents (0.4); continue analyzing and annotating materials in support of [redacted] of phase 2 and damages claim (2.2); advise NC regarding revisions to memorandum regarding same (0.1).	2.90	1250.00	3,625.00
1/17/25	BA	Continue analyzing disputed payment amounts, correspond with JS and with litigation and client team regarding same, and participate in teleconference with P. Tomasco, JS, and J. Cohn regarding strategy for same (1.9); review Whinstone's filing on scope of phase 2 and correspondence regarding water payments, correspond with JS regarding same, and continue analyzing and outlining arguments for response to Whinstone's scope filing (2).	3.90	1200.00	4,680.00
1/17/25	JS	Review and evaluate Whinstone scope filing and prepare preliminary outline of response.	3.50	1025.00	3,587.50
1/17/25	SR	Continue reviewing and analyzing material and drafting notes in support of [redacted] claims, damages, and expert analysis.	6.30	750.00	4,725.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/17/25	CS	Continue drafting outline for deposition of [redacted] (6.4); review and analyze Whinstone's statement on scope of phase 2 hearing (0.7).	7.10	850.00	6,035.00
1/17/25	NC	Prepare memorandum for EB regarding [redacted] phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	2.30	350.00	805.00
1/17/25	JH	Update bankruptcy docket.	2.00	350.00	700.00
1/17/25	TT	Conference call with EB regarding status and strategy going forward in support of phase two and affirmative damages hot document assessment (.4)	.40	525.00	210.00
1/17/25	TT	Revise summary and analysis of [redacted] texts to address additional information as directed by EB.	5.50	525.00	2,887.50
1/18/25	BA	Research and draft opposition to Whinstone's Phase 2 statement.	4.30	1200.00	5,160.00
1/18/25	SR	Continue reviewing and analyzing material and drafting notes in support of [redacted] claims, damages, and expert analysis.	6.50	750.00	4,875.00
1/18/25	TB	Continue [redacted] research.	3.10	1200.00	3,720.00
1/18/25	HM	Continue revising phase 2 and affirmative damages document review memorandum (1.4).	1.40	700.00	980.00
1/19/25	BA	Continue researching and drafting opposition to Whinstone's Phase 2 statement.	4.50	1200.00	5,400.00
1/19/25	TB	Continue [redacted] research and analysis regarding [redacted].	2.90	1200.00	3,480.00
1/19/25	HM	Revise phase 2 and affirmative damages case document review memorandum (3.8).	3.80	700.00	2,660.00
1/19/25	TT	Review and analyze embedded attachments from Rhodium texts regarding hot document assessment for phase two and affirmative damages.	8.60	525.00	4,515.00
1/20/25	EB	Revise phase 2 and damages document review memorandum (1.8); correspond with BA, JS, VO, PB, and HM regarding further revisions to and next steps in support of same and with TT regarding text review and analysis (0.5); continue annotating materials for [redacted] phase 2 and damages analysis (1.5).	3.80	1250.00	4,750.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/20/25	EB	Attend teleconference with CS [redacted] deposition regarding outline and preparation.	.20	1250.00	250.00
1/20/25	BA	Continue researching and drafting response to Whinstone's phase 2 scope filing and correspond and confer with JS regarding same (3.6); correspond with P. Tomasco and client team regarding payment disputes with Whinstone and phase 2 issues (0.3).	3.90	1200.00	4,680.00
1/20/25	JS	Prepare for and attend call with counsel and client teams regarding statement of scope (1.3); review and revise statement of scope (4.5); confer with BA regarding same (0.1).	5.90	1025.00	6,047.50
1/20/25	CS	Call with EB to discuss status of [redacted] deposition outline (0.2); continue drafting outline for deposition of [redacted] (7.2)	7.40	850.00	6,290.00
1/20/25	PB	Teleconference with BA and JS regarding brief on scope of Phase 2.	1.00	850.00	850.00
1/20/25	HM	Revise phase 2 and affirmative damages review memorandum (0.7).	.70	700.00	490.00
1/20/25	TT	Continue reviewing and analyzing embedded attachments as requested by EB.	5.60	525.00	2,940.00
1/21/25	EB	Correspond with Stris team regarding high priority action items including final revisions to phase 2 review memorandum (0.2); attend teleconference with BA, JS, PB, and HM regarding action items including same (0.8); prepare for (0.2) and attend (0.3) teleconference with [redacted] regarding action items including [redacted] notice; continue annotating materials for [redacted] phase 2 and damages memorandum (1.5); review draft memorandum and advise NC regarding revisions to same (0.3); attend portion of checkpoint teleconference with clients and co-counsel (0.5).	3.80	1250.00	4,750.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/21/25	BA	Continue researching and drafting response to Whinstone's Phase 2 statement, correspond with litigation team and with JS, HM, and PB regarding strategy for same, and review and incorporate revisions from bankruptcy counsel for same (4.2); participate in teleconference with bankruptcy counsel, client, and litigation team (.5); review draft document review memorandum for affirmative damages phase, convey edits on some to EB and HM, and participate in teleconference with EB, HM, JS, and PB to discuss revisions to same and finalize tagging decisions (0.8).	5.50	1200.00	6,600.00
1/21/25	JS	Assist in preparation of Statement of Scope (2.4); attend portion of weekly touch-point call with client and outside counsel teams (0.5); attend teleconference with BA, EB, HM, and PB regarding damages phase document review memorandum (0.8).	3.70	1025.00	3,792.50
1/21/25	SR	Continue reviewing and analyzing material and drafting notes in support of [redacted] claims, damages, and expert analysis.	3.50	750.00	2,625.00
1/21/25	TB	Continue [redacted] research and analysis.	3.80	1200.00	4,560.00
1/21/25	CS	Continue drafting outline for deposition of [redacted].	8.10	850.00	6,885.00
1/21/25	CHH	Review BA email and collect documents for Phase II preparations accordingly (0.3); review and analyze Quinn Emanuel [redacted] request (0.2); confer with PB regarding same (0.1); work on same (4.0).	4.60	350.00	1,610.00
1/21/25	NC	Continue preparing memorandum for EB regarding [redacted] phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.50	350.00	525.00
1/21/25	JH	Update bankruptcy docket (0.5); review materials from HM to prepare for phase 2 and damages case document review (1.0).	1.50	350.00	525.00
1/21/25	PB	Teleconference with BA, JS, EB, and HM regarding strategy for Phase 2 preparation and follow-up call with HM regarding same (1.0); call with BA regarding brief on scope of Phase 2 (0.3); call with CH regarding response to SAFE request (0.2).	1.50	850.00	1,275.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/21/25	HM	Teleconference with EB, PB, JS, and BA regarding phase 2 and affirmative damages document review memorandum (0.8); confer with PB about document review management (0.2); revise phase 2 and affirmative damages document review memorandum (3.3); assist BA with upcoming filing on scope of phase 2 (0.4).	4.70	700.00	3,290.00
1/21/25	TT	Continue reviewing and analyzing embedded attachments.	6.90	525.00	3,622.50
1/22/25	EB	Revise and advise CS regarding revisions to [redacted] deposition outline (3.5); correspond with BA, JS, and NC regarding [redacted] notice (0.1); attend teleconference with PB, HM, TT, ASA, CHH, JHA, and SB regarding phase 2 document review instructions (1.0); correspond with [redacted] regarding [redacted] notice (0.2); attention to case management (0.3); review and respond to team correspondence regarding high priority action items including response to [redacted] inquiries (0.5).	5.60	1250.00	7,000.00
1/22/25	BA	Continue researching, reviewing, and drafting response to Whinstone's phase 2 statement, correspond with litigation and bankruptcy counsel regarding revisions to same, correspond and confer with PS and JS regarding invoice analysis and related strategy for same, review and revise supporting materials and declaration for same, and correspond with JS, PB, HM, SB, and CH and B. Howell as necessary regarding finalization and filing of same (5.2); correspond with [redacted] and P. Tomasco regarding [redacted], correspond with EB regarding client request for assistance with [redacted], and correspond with JS and EB regarding updating [redacted] notice (0.2); correspond with CH and with bankruptcy counsel regarding document search requests from SAFE holders (0.2); correspond with EB and VO regarding request from [redacted] for expert reports and correspond with EB regarding Midas Green counterclaim description for bankruptcy schedules (0.2).	5.80	1200.00	6,960.00
1/22/25	JS	Assist in finalizing Statement of Scope.	3.00	1025.00	3,075.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/22/25	SB	Attend teleconference with EB, PB, HM, TT, ASA, CHH and JHA regarding phase 2 document review instructions (1.0); create Asay declaration iso Debtors' scope statement (1.8); create exhibits iso Debtors' scope statement (1.0).	3.80	350.00	1,330.00
1/22/25	CS	Continue drafting outline for deposition of [redacted].	6.10	850.00	5,185.00
1/22/25	CHH	Prepare discovery database for phase 2 document review (0.1); attend teleconference with EB, PB, HM, TT, ASA, JHA, and SB regarding phase 2 document review instructions (1.0); teleconference with [redacted] regarding proximity searching (0.3); continue running search term reports for Quinn (3.5); [redacted] issues with same in email memorandum to BA and JS (0.1); cite-check and proofread Debtors' response and counter-statement on the scope of phase 2 (3.2).	8.20	350.00	2,870.00
1/22/25	NC	Continue preparing memorandum for EB regarding [redacted] phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.20	350.00	420.00
1/22/25	JH	Attend teleconference with EB, PB, HM, TT, ASA, CHH and SB regarding phase 2 document review instructions (1.0); review first assigned batch of documents for Phase 2 issues (6.0).	7.00	350.00	2,450.00
1/22/25	PB	Attend teleconference with EB, HM, TT, ASA, CHH< JHA, and SB regarding Phase 2 document review instructions (1.0); prepare analysis to support brief regarding Phase 2 scope (2.2); teleconferences with BA and JS regarding same (0.8); call with CH regarding response to discovery requests (0.1).	4.10	850.00	3,485.00
1/22/25	ASA	Attend teleconference with EB, PB, HM, TT, CHH, JHA, and SB regarding phase 2 document review instructions (1.0); review and analyze materials from HM to prepare for phase 2 document review (1.0); begin Phase 2 document review (0.7).	2.70	350.00	945.00
1/22/25	HM	Attend teleconference with EB, PB, HM, TT, ASA, CHH, JHA, and SB regarding phase 2 document review instructions (1.0); assist BA with scope filing (1.0); perform tasks related to document review, including [redacted] batch completion and drafting correspondence to reviewers (0.6).	2.60	700.00	1,820.00
1/22/25	TT	Attend teleconference with EB, PB, HM, TT, ASA, CHH, JHA, and SB regarding phase 2 document review instructions (1.0).	1.00	525.00	525.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/22/25	TT	Continue reviewing and analyzing embedded text attachments.	7.80	525.00	4,095.00
1/23/25	PS	Prepare for (1.0) and attend (1.1) teleconference with EB, BA, JS, CS, PB, HM, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items.	2.10	1450.00	3,045.00
1/23/25	EB	Confer with BA regarding action items including response to credits analysis inquiry (0.2); correspond with P. Tomasco and R. Izakelian regarding same (0.3); review and advise NC regarding revisions to [redacted] memorandum (0.2); continue reviewing and annotating materials in support of same (2.5); attend initial daily checkpoint phase 2 document review teleconference to assess progress, address questions, and advise regarding revisions to review memoranda and protocol (0.2); prepare for (0.5) and attend (1.1) teleconference with PS, EB, BA, JS, CS, PB, HM, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority phase 2 action items; review comments and questions from CS (0.2) and attend teleconference with CS regarding revisions to [redacted] deposition outline (0.3); provide materials to CS in support of same (0.1); correspond with co-counsel and [redacted] regarding [redacted] and TB regarding review and analysis of materials in support of mediation (0.2).	5.80	1250.00	7,250.00
1/23/25	BA	Attend teleconference with PS, EB, JS, CS, PB, HM, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items (1); correspond with JS regarding upcoming status conference on Phase 2 scope, correspond with P. Tomasco regarding same, and begin preparing for argument at same (1.2); review updates from CH regarding issues with Logikcull searches requested by bankruptcy counsel (0.2).	2.40	1200.00	2,880.00
1/23/25	JS	Attend teleconference with PS, EB, BA, CS, PB, HM, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items (1.1); review and evaluate strategic questions posed by [redacted] in connection with Phase 2 and damages case strategy (0.7); confer with [redacted] regarding same (0.1).	1.90	1025.00	1,947.50
1/23/25	SR	Attend portion of teleconference with PS, EB, BA, JS, CS, PB, HM, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items.	1.00	750.00	750.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/23/25	SB	Attend teleconference with PS, EB, BA, JS, CS, PB, HM, SR, CHH, MV, JHA, and ASA regarding strategic and high-priority Phase 2 action items (1.1); attend daily checkpoint teleconference regarding phase 2 document review. (0.2); conduct Phase 2 document review (3.7).	5.00	350.00	1,750.00
1/23/25	CS	Meet with EB regarding status of outline for deposition of [redacted] (0.3); attend teleconference with PS, EB, BA, JS, PB, HM, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items (1.1); continue drafting outline for deposition of [redacted] (5.8)	7.20	850.00	6,120.00
1/23/25	CHH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); prepare discovery database for same (0.1); attend teleconference with PS, EB, BA, JS, CS, PB, HM, SR, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items (1.1); collect and prepare background documents regarding [redacted] for team to review (0.3); confer with [redacted] regarding proximity searching issues (0.1); test run various searches with proposed solution to same (0.2); email memorandum to BA regarding same (0.1); review and analyze materials from HM to prepare for phase 2 document review (1.0); review first assigned phase 2 document review batch (1.5).	4.60	350.00	1,610.00
1/23/25	NC	Continue preparing memorandum for EB regarding [redacted] of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.80	350.00	630.00
1/23/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review second assigned batch of documents for Phase 2 issues (5.0).	5.20	350.00	1,820.00
1/23/25	PB	Attend teleconference with PS, EB, BA, JS, CS, HM, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items.	1.10	850.00	935.00
1/23/25	ASA	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); circulate requested deposition transcript at request of EB (0.2); review assigned batch of Phase 2 documents (3.0); attend teleconference with PS, EB, BA, JS, CS, PB, HM, SR, MV, SB, JHA, and CHH regarding strategic and high-priority Phase 2 action items (1.1).	4.50	350.00	1,575.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/23/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); attend teleconference with PS, EB, BA, JS, CS, PB, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items (1.1); perform quality check of document review (0.5); draft phase 2 task list (0.3).	2.10	700.00	1,470.00
1/23/25	TT	Review and analyze revised memorandum from HM and Order of U.S. Bankruptcy Court in preparation for phase 2 and affirmative damages review.	1.20	525.00	630.00
1/23/25	MV	Attend teleconference with PS, EB, BA, JS, CS, PB, HM, SR, CHH, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items.	1.10	425.00	467.50
1/24/25	EB	Provide further feedback to CS regarding revisions to [redacted] deposition outline (0.5); review and respond to team and co-counsel correspondence regarding high priority action items (0.5); review and comment on draft complaint (2.0); continue annotating [redacted] phase 1 materials in support of phase 2 and damages claims (1.1).	4.10	1250.00	5,125.00
1/24/25	BA	Prepare for status conference/hearing on scope of phase 2, including conferring with P. Tomasco, W. Thompson, J. Cohn, and JS (4.3); participate in status conference/hearing on scope of phase 2 (1); confer with [redacted] and [redacted] following hearing (0.2); confer with JS regarding follow up from hearing (0.1); correspond with litigation and bankruptcy counsel regarding ongoing issues with [redacted] (0.1).	5.60	1200.00	6,720.00
1/24/25	JS	Attend portion of teleconference with outside counsel teams to prepare for hearing on scope of Phase 2 (0.6); attend teleconferences with BA to prepare for (0.8) and debrief from (0.1) hearing on scope of Phase 2; attend hearing on Phase 2 (0.9); begin reviewing and evaluating damages complaint (1.0).	3.40	1025.00	3,485.00
1/24/25	TB	Update [redacted] research and analysis based on review of additional [redacted] materials.	4.50	1200.00	5,400.00
1/24/25	CS	Continue drafting outline for deposition of [redacted] (6.1); review hearing on phase two trial issues (1).	7.10	850.00	6,035.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/24/25	CHH	Review first assigned phase 2 document review batch (1.5); attend daily checkpoint teleconference regarding phase 2 document review (0.3); review second assigned phase 2 document review batch (2.0); review third assigned phase 2 document review batch (0.5).	4.30	350.00	1,505.00
1/24/25	NC	Continue preparing memorandum for EB regarding [redacted] of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	5.30	350.00	1,855.00
1/24/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review third assigned batch of documents for Phase 2 issues (6.0).	6.30	350.00	2,205.00
1/24/25	PB	Attend daily team meeting regarding document preparation for Phase 2 hearing (0.3); attend portion of hearing regarding scope of Phase 2 (0.5).	.80	850.00	680.00
1/24/25	ASA	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); update running matter status memorandum (0.2); review assigned batch of Phase 2 documents (5.0)	5.50	350.00	1,925.00
1/24/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review and respond to team correspondence regarding phase 2 document review (0.6).	.90	700.00	630.00
1/24/25	SD	Prepare and organize documents for BA's hearing in U.S. Bankruptcy Court, Southern Dist. of Texas (0.9).	.90	350.00	315.00
1/25/25	BA	Review correspondence from W. Thompson regarding miner installations and correspond with [redacted] regarding same (0.1); begin reviewing draft affirmative complaint (0.9).	1.00	1200.00	1,200.00
1/25/25	JS	Review and evaluate draft damages phase complaint.	1.50	1025.00	1,537.50
1/25/25	TB	Continue updating [redacted] analysis based upon additional [redacted] litigation documents.	1.20	1200.00	1,440.00
1/25/25	CS	Continue drafting outline for deposition of [redacted].	2.00	850.00	1,700.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/26/25	EB	Continue reviewing and commenting on draft complaint including responding to comments from BA (0.6); continue reviewing and annotating materials in support of [redacted] phase 2 and damages claims (2.0); correspond with NC regarding next steps in support of memorandum regarding same (0.1).	2.70	1250.00	3,375.00
1/26/25	BA	Correspond with EB and JS regarding draft complaint and review additional comments from EB on same.	.20	1200.00	240.00
1/26/25	JS	Further review and revise draft damages phase complaint.	1.00	1025.00	1,025.00
1/26/25	CS	Continue revising outline for deposition of [redacted].	3.10	850.00	2,635.00
1/27/25	EB	Correspond with BA, JS, HM, MV, and litigation assistants regarding high priority action items in support of phase 2 (0.5); continue reviewing and annotating [redacted] phase 1 materials (3.0); review and begin further revising revised [redacted] deposition outline from CS (2.1); review update from and advise TT regarding next steps in support of text analysis (0.3); confer with and provide documents to A. Swartz in support of revisions to draft complaint (0.3).	6.20	1250.00	7,750.00
1/27/25	BA	Correspond with JS and EB regarding high priority action items for both phase 2 and affirmative case, correspond with HM regarding text message storage by Setec, and review client update regarding miner installation (0.4).	.40	1200.00	480.00
1/27/25	JS	Attend teleconferences with [redacted] and [redacted] (1.3); further review damages phase complaint (0.5); evaluate high priority action items in connection with Phase 2 and damages case (1.1).	2.90	1025.00	2,972.50
1/27/25	SR	Continue reviewing and analyzing material and drafting notes in support of [redacted] claims, damages, and expert analysis.	1.00	750.00	750.00
1/27/25	SB	Attend portion of daily checkpoint teleconference regarding phase 2 document review. (0.1); conduct Phase 2 document review (2.9).	3.00	350.00	1,050.00
1/27/25	NC	Continue preparing memorandum for EB regarding [redacted] of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.50	350.00	525.00

Stris & Maher LLP

Invoice # 14459 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/27/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review fourth assigned batch of documents for Phase 2 issues (4.0).	4.20	350.00	1,470.00
1/27/25	ASA	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review assigned batch of Phase 2 documents (3.8).	4.00	350.00	1,400.00
1/27/25	HM	Perform quality check of phase 2 document review (0.1); update document review memorandum (0.3); attend daily checkpoint teleconference regarding phase 2 document review (0.1); confer with [redacted] Setec regarding storage of cell phone images (0.3); draft correspondence to BA, JS, and PB regarding storage of cell phone images (0.3).	1.10	700.00	770.00
1/27/25	TT	Revise summary and analysis of [redacted] texts to address additional information as directed by EB.	5.10	525.00	2,677.50
1/27/25	MV	Assist with syntax and search parameters for phase 2 review (0.8); begin preparing phase 2 exhibits and exhibit list (1.2); create targeted searches and provide results for attorney review (0.5).	2.50	425.00	1,062.50
1/28/25	EB	Correspond with NC regarding [redacted] memorandum (0.1); continue annotating materials for same (1.9); prepare for (0.6) and attend (1.0) teleconference with BA, JS, and SR regarding action items in support of [redacted] analysis; review and respond to team correspondence and correspondence with co-counsel regarding high priority action items including revisions to draft complaint (0.4); correspond with [redacted] regarding analysis and action items (0.1); prepare for (0.2) and attend portion of (1.1) teleconference with clients and co-counsel.	5.40	1250.00	6,750.00

Invoice # 14459 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/28/25	BA	Review, research, and analyze proposed slides for financing process as related to damages claims, correspond with JS and EB regarding same, and correspond with litigation team and client team regarding same (0.8); participate in teleconference with SR, JS, and EB to analyze and strategize for work of [redacted] expert [redacted] (1); review and analyze revised draft of amended complaint, correspond with litigation team regarding same, and research issues for same (0.8); participate in teleconference with client team, litigation team, and bankruptcy counsel (1.1); review revisions to draft affirmative complaint and convey edits on same to JS and EB (0.4); analyze research on [redacted] issues as relevant to [redacted] complaint (0.3).	4.40	1200.00	5,280.00
1/28/25	JS	Attend client touch point call (0.7); attend portion of teleconference with SR, EB, and BA regarding [redacted] issues in connection with damages phase (0.5); evaluate [redacted] slides in connection with [redacted] issues (0.6); review and evaluate revised complaint (0.5).	2.30	1025.00	2,357.50
1/28/25	SR	Continue reviewing and analyzing material and drafting notes in support of [redacted] claims, damages, and expert analysis (4.8); attend teleconference with EB, BA, and JS to discuss action items and strategy relating to the same (1); review and analyze damages-related calculations top assist EB, JS, and BA in preparation for client call regarding the same (1.7).	7.40	750.00	5,550.00
1/28/25	SB	Attend portion of daily checkpoint teleconference regarding phase 2 document review. (0.1); conduct Phase 2 document review (3.9).	4.00	350.00	1,400.00
1/28/25	CHH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); teleconference with MV regarding various targeted searches in support of phase 2 discovery (0.3); generate same (0.1); review and analyze documents regarding [redacted] issue (0.7); email memorandum to EB regarding same (0.1); review third assigned phase 2 document review batch (1.0).	2.40	350.00	840.00

Invoice # 14459 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/28/25	NC	Continue preparing memorandum for EB regarding [redacted] of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.70	350.00	595.00
1/28/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review fifth assigned batch of documents for Phase 2 issues (5.0).	5.20	350.00	1,820.00
1/28/25	ASA	Assist EB with access to spreadsheets provided by [redacted] (0.3); update [redacted] memorandum (0.2); attend daily checkpoint teleconference regarding phase 2 document review (0.2): continue review of Phase 2 documents [redacted] (2.8).	3.50	350.00	1,225.00
1/28/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); perform quality check of phase 2 document review (0.9); correspond with EB about progress of document review (0.5).	1.60	700.00	1,120.00
1/28/25	TT	Continue revising summary and analysis of [redacted] texts(2.1); revise summary and analysis of [redacted] (0.8) and [redacted] (2.5) texts in support of phase 2 litigation and affirmative damages claims.	5.40	525.00	2,835.00
1/28/25	MV	Attend teleconference with CH regarding search parameters and syntax set-up for phase 2 targeted searches (0.3); review documents from targeted document searches, create and revise additional searches, and update HM and team regarding same (1.9).	2.20	425.00	935.00
1/29/25	EB	Review revised slide deck and draft complaint to assist with further revisions (1.4); attend teleconference with JS and co-counsel regarding revisions to and action items in support of latter (0.6); review additional materials from [redacted] in support of same and to prepare for upcoming teleconference (0.2); attend teleconference with BA, SR, and [redacted] regarding related analysis (1.0); correspond with BA, JS, and SR regarding resulting action items (0.1).	3.30	1250.00	4,125.00
1/29/25	BA	Participate in teleconference with [redacted], EB, and SR to discuss action items and analysis related to damages calculations.	1.00	1200.00	1,200.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/29/25	JS	Attend teleconference with EB and co-counsel regarding revisions and action items in connection with slide deck draft (0.6); review and revise same and draft complaint (0.9); evaluate motion to [redacted] and related issues (1.5)	3.00	1025.00	3,075.00
1/29/25	SR	Attend videoconference with [redacted], EB, BA to discuss [redacted] and damages-related expert analysis (1); review and analyze correspondence from [redacted] regarding the same (1); continue analyzing material and drafting notes in support of [redacted], damages, and expert analysis (5.5).	7.50	750.00	5,625.00
1/29/25	SB	Attend portion of daily checkpoint teleconference regarding phase 2 document review. (0.2); conduct Phase 2 document review (4.0).	4.20	350.00	1,470.00
1/29/25	CHH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); targeted searching and review and analysis of documents for same (0.5); emails to EB and HM regarding same (0.1); review fourth assigned phase 2 document review batch (2.5); review fifth assigned phase 2 document review batch (1.4).	4.80	350.00	1,680.00
1/29/25	NC	Continue preparing memorandum for EB regarding [redacted] of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.60	350.00	560.00
1/29/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); update bankruptcy docket (0.5); review sixth assigned batch of documents for Phase 2 issues (4.0).	4.80	350.00	1,680.00
1/29/25	ASA	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); continue review of assigned Phase 2 documents [redacted] (3.4); update [redacted] memorandum at request of EB (0.3).	4.00	350.00	1,400.00
1/29/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); update document review memorandum (0.2); review and respond to team correspondence regarding document review (1.5); attention to organization of internal matter files (0.5).	2.50	700.00	1,750.00
1/29/25	TT	Continue analyzing embedded attachments.	1.70	525.00	892.50

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Date	Tkpr	Description	Hours	Rate	Amount
1/29/25	MV	Assist with further targeted searches for attorney review.	2.50	425.00	1,062.50
1/30/25	PS	Prepare for (0.5) and attend (0.3) team teleconference regarding high priority action items.	.80	1450.00	1,160.00
1/30/25	EB	Continue analyzing and corresponding with BA, JS, SR, C. [redacted] and co-counsel regarding information in support of [redacted] analysis (1.5); attend portion of Stris team teleconference regarding high priority action items (0.2); attend teleconference with JS, client, and co-counsel regarding [redacted] expert (0.5).	2.20	1250.00	2,750.00
1/30/25	BA	Continue reviewing and analyzing adversary complaint, including edits and comments on same from client team and bankruptcy team, and correspond with A. Swartz and team regarding same (1.7); participate in teleconference with litigation team, bankruptcy counsel, and client team regarding [redacted] to Whinstone (0.6); attend teleconference with PB, HM, PS, EB, CHH, ASA, and JHA to discuss strategic and high-priority Phase 2 action items (0.3); confer with EB regarding proposed [redacted] expert [redacted] (0.1); confer with JS regarding case status and correspond with J. Cohn and team regarding water bill invoices (0.2); continue analyzing research on issues related to [redacted] for damages claims (0.3).	3.20	1200.00	3,840.00
1/30/25	JS	Further review and evaluate complaint in connection with water issues (1.1); attend client call regarding [redacted] issues (0.6); attend call with [redacted] regarding Whinstone litigation issues (1.1).	2.80	1025.00	2,870.00
1/30/25	SB	Conduct Phase 2 document review (3.2).	3.20	350.00	1,120.00
1/30/25	CHH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review fifth assigned phase 2 document review batch (1.0); review sixth assigned phase 2 review batch (2.0); review seventh assigned phase 2 review batch (2.0); attend teleconference with BA, PB, HM, PS, EB, ASA, and JHA to discuss strategic and high-priority Phase 2 action items (0.3).	5.60	350.00	1,960.00

Invoice # 14459 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/30/25	NC	Continue preparing memorandum for EB regarding [redacted] of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	2.20	350.00	770.00
1/30/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); update bankruptcy docket (0.1); review seventh assigned batch of documents for Phase 2 issues (4.0).	4.40	350.00	1,540.00
1/30/25	PB	Attend teleconference with BA, PB, HM, PS, EB, CHH, ASA, and JHA to discuss strategic and high-priority Phase 2 action items.	.30	850.00	255.00
1/30/25	ASA	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); attend teleconference with BA, PB, HM, PS, EB, CHH, and JHA to discuss strategic and high-priority Phase 2 action items (0.3); provide ShareFile link for [redacted] and download updated spreadsheet (0.1); update [redacted] memorandum (0.2); continue review of assigned Phase 2 documents (5.1).	6.00	350.00	2,100.00
1/30/25	HM	Attend teleconference with BA, PB, PS, EB, CHH, ASA, and JHA to discuss strategic and high-priority Phase 2 action items (0.3); attend daily checkpoint teleconference regarding phase 2 document review (0.3); review and respond to team correspondence regarding task list and document review (0.7).	1.30	700.00	910.00
1/30/25	MV	Attend teleconference with PS, EB, BA, JS, CS, PB, HM, SR, CHH, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items.	.30	425.00	127.50
1/31/25	EB	Correspond with BA, HM, MV, TT, and CH regarding status and action items in support of document review, qc, and exhibit list (0.5); correspond with JS and co-counsel regarding material and action items in support of revisions to draft complaint (0.6); advise NC regarding next steps in support of memorandum (0.1); revise [redacted] deposition outline (1.7).	2.90	1250.00	3,625.00

Invoice # 14459 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/31/25	BA	Review and analyze new NDA agreement required by Whinstone for employees, correspond with CH to request document comparison, correspond with client regarding same, and correspond with J. Cohn, W. Thompson, P. Tomasco, and JS regarding analysis of same and [redacted] (1.8); participate in teleconference with client team, P. Tomasco, and A. Swartz regarding [redacted] consultant (0.5); correspond with P. Tomasco and litigation team regarding next steps for [redacted] consultant, and potential further production of documents for [redacted] (0.3); correspond with J. Cohn and JS regarding water invoices, request history of same from [redacted], and review same as relevant to phase 2, and correspond with HM, MV, and CH regarding use of same as phase 2 exhibits (0.5); review correspondence from [redacted] regarding potential mediation and correspond with P. Tomasco and team regarding same (0.2); correspond with HM, EB, and CH regarding document review updates and potential phase 2 exhibits (0.2); correspond with HM regarding [redacted] data storage (0.1); review Whinstone's reply regarding scope of phase 2 and correspond with P. Tomasco regarding potential response to same (0.4).	3.90	1200.00	4,680.00
1/31/25	CHH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review eighth assigned phase 2 document review batch (2.0); review ninth assigned phase 2 review batch (2.0); targeted searching and analysis of [redacted] issues (0.5).	4.70	350.00	1,645.00
1/31/25	NC	Continue preparing memorandum for EB regarding [redacted] of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	6.10	350.00	2,135.00
1/31/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); update bankruptcy docket (0.2); review eighth assigned batch of documents for Phase 2 issues (5.0).	5.50	350.00	1,925.00
1/31/25	ASA	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); continue review of assigned Phase 2 documents (5.0).	5.30	350.00	1,855.00

Stris & Maher LLP

Invoice # 14459 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/31/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); confer with TT regarding phase 2 document review (1.1); perform quality check of document review (1.2); amend review memorandum (0.5); review and respond to team correspondence regarding document review and other targeted document searches (1.6).	4.70	700.00	3,290.00
1/31/25	TT	Review and analyze additional materials in support of phase 2 document review (0.4); confer with HM regarding phase 2 document review (1.1).	1.50	525.00	787.50
1/31/25	MV	Continue working on Phase 2 exhibits and exhibit list.	1.00	425.00	425.00
		TOTAL PROFESSIONAL SERVICES			**$ 634,762.50**

Invoice # 14459 February 21, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	9.00	1,450.00	13,050.00
Elizabeth Brannen	EB	Partner	72.80	1,250.00	91,000.00
Bridget Asay	BA	Partner	82.90	1,200.00	99,480.00
Tillman Breckenridge	TB	Partner	19.30	1,200.00	23,160.00
Victor O'Connell	VO	Partner	6.60	1,025.00	6,765.00
John Stokes	JS	Partner	80.40	1,025.00	82,410.00
Colleen Smith	CS	Associate	103.20	850.00	87,720.00
Peter Brody	PB	Associate	15.10	850.00	12,835.00
Sarah Rahimi	SR	Associate	80.00	750.00	60,000.00
Helen Marsh	HM	Associate	47.30	700.00	33,110.00
Tanya Tice	TT	Discovery Associate	115.50	525.00	60,637.50
Monica Viramontes	MV	Sr Paralegal	9.60	425.00	4,080.00
Andrew Atsalis	ASA	Fellow	36.40	350.00	12,740.00
Cynthia Huang	CHH	Fellow	40.90	350.00	14,315.00
Sebastian Delgado	SD	Fellow	.90	350.00	315.00
Shayra Banta	SB	Fellow	23.20	350.00	8,120.00
Nicholas Capalbo	NC	Fellow	25.40	350.00	8,890.00
Jaida Hodge-Adams	JH	Fellow	46.10	350.00	16,135.00
Total			**814.60**		**$ 634,762.50**

Invoice # 14459 February 21, 2025

EXPENSES ADVANCED

Date	Task	Description	Amount
11/30/24		Printing for the Rhodium trial in Houston.	6,687.77
12/05/24		Local Travel - The Lancaster Hotel - lodging for Houston Depositions.	30,919.21
12/19/24		Local Travel - Vendor fee for research documents.	116.49
12/27/24		Local Travel - Newswire press release service fee.	349.00
12/31/24		Litigation Support Vendors	2,550.00
1/01/25		Logikcull EDiscovery SaaS subscription.	2,646.00
2/11/25		Stone turn - Balance of professional services rendered.	162,000.00
		TOTAL EXPENSES ADVANCED	**$ 205,268.47**
		TOTAL THIS INVOICE	**$ 840,030.97**

Invoice # 14459 February 21, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14249	11/01/24	79,868.00	63,894.40	15,973.60
14263	11/04/24	1,139,238.00	918,737.10	220,500.90
14269	11/14/24	1,632,686.25	1,329,529.25	303,157.00
14317	12/19/24	1,183,151.62	1,022,299.12	160,852.50
14366	1/13/25	132,202.25	111,327.25	20,875.00

Previous Balance	$ 721,359.00
Balance Due This Invoice	$ 840,030.97
TOTAL BALANCE DUE	**$ 1,561,389.97**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 20,875.00	$ 160,852.50	$ 539,631.50	$ .00	$ 721,359.00

Stris

February 21, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14472
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through January 31, 2025

RE: Retention and Fee Applications

Total Professional Services	$ 8,575.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 8,575.00**
Previous Balance	$ 22,525.00
TOTAL BALANCE DUE	**$ 31,100.00**

Electronic Invoice

Invoice # 14472 February 21, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
1/09/25	EB	Begin working on December fee statement.	1.40	1250.00	1,750.00
1/10/25	EB	Continue working on December fee statement.	2.60	1250.00	3,250.00
1/10/25	NC	Assist EB with portions of December fee statement.	1.80	350.00	630.00
1/13/25	EB	Continue preparing portions of December fee statement.	1.00	1250.00	1,250.00
1/14/25	EB	Correspond with NC regarding (0.1) and continue preparing portions of December fee statement (0.6).	.70	1250.00	875.00
1/20/25	VO	Work on December fee application.	.80	1025.00	820.00
		TOTAL PROFESSIONAL SERVICES			**$ 8,575.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	5.70	1,250.00	7,125.00
Victor O'Connell	VO	Partner	.80	1,025.00	820.00
Nicholas Capalbo	NC	Fellow	1.80	350.00	630.00
Total			**8.30**		**$ 8,575.00**

TOTAL THIS INVOICE **$ 8,575.00**

Stris & Maher LLP

Invoice # 14472 February 21, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14261	11/04/24	47,165.00	37,732.00	9,433.00
14284	11/14/24	12,985.00	10,388.00	2,597.00
14331	12/19/24	46,190.00	36,952.00	9,238.00
14381	1/13/25	6,285.00	5,028.00	1,257.00

Previous Balance	$ 22,525.00
Balance Due This Invoice	$ 8,575.00
TOTAL BALANCE DUE	**$ 31,100.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 1,257.00	$ 9,238.00	$ 12,030.00	$ .00	$ 22,525.00

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 SIXTH MONTHLY FEE STATEMENT
FOR THE PERIOD FEBRUARY 1, 2025, THROUGH FEBRUARY 28, 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 February 1, 2025, through February 28, 2025 (the "Second Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $624,995.00 (80% of the services rendered), plus $18,425.62 (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.

[1] 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 Second 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 (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 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;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (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 (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 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 (ha.nguyen@usdoj.gov), 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 3rd day of April, 2025.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
Patricia B. Tomasco (SBN 01797600)
Joanna D. Caytas (SBN 24127230)
Cameron Kelly (SBN 24120936)
Alain Jaquet (*pro hac vice)*
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Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on April 3, 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

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	12.6	$15,240.00	$12,192.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	969.1	$736,447.50	$589,158.00
007	Retention and Fee Applications	22.5	$16,177.50	$12,942.00
008	Non-working Travel for Whinstone Dispute	32.6	$13,378.75	$10,703.00
Total		1036.8	$781,243.75	$624,995.00

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,250.00	9.2	$11,500.00
Ken Halpern	Partner	1997	$1,100.00	3.4	$3,740.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Peter Stris	Founding Partner	2001	1,450.00	11.50	$16,675.00
Elizabeth Brannen	Managing Partner	2001	1,250.00	85.00	$106,250.00
Bridget Asay	Partner	1997	1,200.00	52.40	$62,880.00
Tillman Breckenridge	Partner	2003	1,200.00	47.00	$56,400.00
Victor O'Connell	Partner	2012	1,025.00	19.90	$20,397.50
John Stokes	Partner	2016	1,025.00	87.10	$89,277.50
Colleen Smith	Associate	2015	850.00	83.40	$70,890.00
Peter Brody	Associate	2016	850.00	53.30	$45,305.00
Sarah Rahimi	Associate	2019	750.00	63.70	$47,775.00
Helen Marsh	Associate	2024	700.00	84.60	$59,220.00
Tanya Tice	Discovery Associate	1989	525.00	142.40	$74,760.00
Monica Viramontes	Senior Paralegal	N/A	425.00	40.50	$17,212.50
Andrew Atsalis	Litigation Fellow	N/A	350.00	71.20	$24,920.00
Cynthia Huang	Litigation Fellow	N/A	350.00	49.50	$17,325.00
Sebastian Delgado	Litigation Fellow	N/A	350.00	2.20	$770.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	32.30	$11,305.00
Jaida Hodge-Adams	Litigation Fellow	N/A	350.00	43.10	$15,085.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	3.90	$4,875.00
Victor O'Connell	Partner	2012	1,025.00	7.10	$7,277.50
Cynthia Huang	Litigation Fellow	N/A	350.00	9.70	$3,395.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	1.80	$630.00

Non-Working Travel for Whinstone Dispute[2]

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Bridget Asay	Partner	1997	1,200.00	12.10	$14,520.00
Victor O'Connell	Partner	2012	1,025.00	7.50	$7,687.50
Andrew Atsalis	Litigation Fellow	N/A	350.00	13.00	$4,550.00
Total after 50% discount					$13,378.75

[2] Stris & Maher has billed its time for travel in connection with the Whinstone dispute during which no work was performed on a separate invoice at a 50% discount.

EXHIBIT 3

Summaries of Expenses for the Fee Period

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
E-discovery platform fees	$5,292.00
Litigation support	$3,374.68
Travel	$1,258.94
Expert fees	$8,400.00
Court fees	$100.00
Total	$18,425.62

EXHIBIT 4

Stris

March 28, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14498
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through February 28, 2025

RE: Midas Green Litigation

Total Professional Services	$ 15,240.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 15,240.00**
Previous Balance	$ 27,178.00
TOTAL BALANCE DUE	**$ 42,418.00**

Electronic Invoice

Invoice # 14498 March 28, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
2/03/25	EB	Prepare and correspond with Texas counsel regarding notice of order modifying stay.	.50	1250.00	625.00
2/04/25	EB	Correspond with opposing counsel regarding joint submission (0.1); review and begin analyzing draft of same (0.1); correspond with KH, PB, and SR regarding corrections in support of same (0.1).	.30	1250.00	375.00
2/04/25	KJH	Review Midas Green's draft proposed order memorializing the Court's rulings on pretrial motions, motion hearing transcript, and motions, and correspond with EB regarding defects in proposed order.	1.70	1100.00	1,870.00
2/05/25	EB	Revise draft orders on pretrial motions received from opposing counsel (2.6); correspond with KH, BA, co-counsel, and [redacted] regarding proposed revisions to and next steps in support of same (0.1).	2.70	1250.00	3,375.00
2/05/25	KJH	Review draft edits to Midas's proposed order on summary judgment and Dauberts and correspond with EB regarding same.	.60	1100.00	660.00
2/06/25	EB	Correspond with KH and co-counsel regarding revisions to proposed orders (0.2); implement same (0.2); correspond with opposing counsel and confer with [redacted] regarding same (0.1); review and propose revisions to objection to Midas bankruptcy claims (2.9).	3.40	1250.00	4,250.00
2/06/25	KJH	Correspond with EB regarding proposed revisions to draft order on dispositive motions.	.20	1100.00	220.00
2/07/25	EB	Revise proposed orders to incorporate feedback from R. Harrington (0.5); correspond and confer with KH and opposing counsel regarding further revisions to and finalization of same (0.5).	1.00	1250.00	1,250.00
2/07/25	KJH	Review redline to draft proposed order on dispositive motions and correspond with BA, EB, and opposing counsel J. Thomas regarding same (0.5); attend teleconferences with opposing counsel H. Pogorzelski regarding revisions to draft proposed order and Midas proposal to extend time for submission (0.4).	.90	1100.00	990.00

Stris & Maher LLP

Invoice # 14498 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/10/25	EB	Update R. Harrington regarding submission and status.	.10	1250.00	125.00
2/14/25	EB	Correspond with counsel for third party regarding initial response to inquiry.	.10	1250.00	125.00
2/21/25	EB	Correspond with counsel for GRC regarding confidentiality inquiry.	.10	1250.00	125.00
2/24/25	EB	Update [redacted] regarding status (0.1); correspond with Texas counsel and counsel for GRC regarding same and confidentiality request, respectively (0.1).	.20	1250.00	250.00
2/25/25	EB	Correspond with counsel for GRC regarding teleconference to discuss confidentiality inquiry.	.10	1250.00	125.00
2/26/25	EB	Attend teleconference with counsel for GRC (0.4); review correspondence from counsel for GRC providing applicable protective order (0.1) update [redacted] regarding same and potential next steps (0.1).	.60	1250.00	750.00
2/27/25	EB	Communicate with Texas counsel regarding status and steps in support of request for district court ruling.	.10	1250.00	125.00
		TOTAL PROFESSIONAL SERVICES			**$ 15,240.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	9.20	1,250.00	11,500.00
Ken Halpern	KJH	Partner	3.40	1,100.00	3,740.00
Total			**12.60**		**$ 15,240.00**

TOTAL THIS INVOICE **$ 15,240.00**

Stris & Maher LLP

Invoice # 14498 March 28, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14380	1/13/25	8,990.00	7,192.00	1,798.00
14471	2/21/25	25,380.00	.00	25,380.00

Previous Balance	$ 27,178.00
Balance Due This Invoice	$ 15,240.00
TOTAL BALANCE DUE	**$ 42,418.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 25,380.00	$ 1,798.00	$ .00	$ .00	$ 27,178.00

Stris

March 28, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14486
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through February 28, 2025

RE: Whinstone Litigation

Total Professional Services	$ 736,447.50
Total Expenses Advanced	$ 18,425.62
TOTAL THIS INVOICE	**$ 754,873.12**
Previous Balance	$ 860,905.97
TOTAL BALANCE DUE	**$ 1,615,779.09**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Invoice # 14486 March 28, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
2/01/25	BA	Continue reviewing new draft waiver/NDA from Whinstone, draft proposed [redacted] regarding same, and convey same to JS, W. Thompson, J. Cohn, and P. Tomasco (0.6); confer with JS and W. Thompson, regarding [redacted], proposed mediation, and other high priority action items (0.7); review W. Thompson's [redacted] email regarding [redacted], revise same, and convey same to client (0.2).	1.50	1200.00	1,800.00
2/01/25	JS	Confer with BA and W. Thompson regarding high priority action items (0.7); confer with VO and correspond with client and co-counsel regarding mediation planning (0.3).	1.00	1025.00	1,025.00
2/02/25	JS	Review and evaluate complaint and Building D contract claims (2.9); attend teleconference with [redacted] regarding litigation status and next steps (0.5).	3.40	1025.00	3,485.00
2/02/25	TT	Review documents as instructed by HM to help prepare for phase 2 litigation and affirmative damages claim.	2.60	525.00	1,365.00
2/03/25	EB	Correspond with HM and NC regarding action items including document review and MV regarding phase 2 exhibit list (0.2); attention to case management (0.5); continue annotating [redacted] phase 1 materials (1.8); advise CS regarding additional information and material in support of [redacted] deposition (0.1); review and analyze proposed form of consulting agreement (0.3); correspond with BA, JS, VO, co-counsel and [redacted] regarding same (0.2).	3.10	1250.00	3,875.00

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/03/25	BA	Correspond with HM and PB regarding cell phone data storage, update client and legal team regarding same, and correspond with custodians' counsel regarding same (0.3); correspond with legal team and with opposing counsel regarding mediation (0.1); correspond with bankruptcy counsel regarding SAFE group's discovery requests, confer with bankruptcy counsel and PB regarding same and confer further with PB regarding next steps (0.3); review projections document from bankruptcy counsel, correspond with bankruptcy counsel and with PB, JS, and HM regarding steps for production of same (0.3); review draft consulting agreement for client and correspond with EB regarding same (0.2); research and draft reply memorandum regarding phase 2 scope and convey same to J. Cohn, P. Tomasco, W. Thompson, and JS for review (4).	5.20	1200.00	6,240.00
2/03/25	JS	Evaluate high priority action items in connection with Phase 2 and damages claims.	1.30	1025.00	1,332.50
2/03/25	CS	Review and analyze documents relevant to [redacted] deposition; continue revising outline for [redacted] deposition.	4.10	850.00	3,485.00
2/03/25	CHH	Targeted searching for BA regarding water issues for phase 2 (0.5); attend daily checkpoint teleconference regarding phase 2 document review (0.3); review tenth assigned phase 2 document review batch (2.0); review eleventh assigned phase 2 document review batch (2.0); begin reviewing twelfth assigned phase 2 document review batch (0.5); targeted searching for CS regarding [redacted] for phase 2 (0.5).	5.80	350.00	2,030.00
2/03/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	2.00	350.00	700.00
2/03/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review ninth assigned batch of documents for Phase 2 issues (4.5).	4.80	350.00	1,680.00
2/03/25	PB	Prepare to lead (0.1) and attend (0.3) daily checkpoint teleconference regarding phase 2 and damages document review; attend teleconference with B. Asay and R. Izakelian regarding document production (0.3).	.40	850.00	340.00

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/03/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review and respond to team correspondence and questions from document reviewers regarding phase 2 document review (2.3); draft guidance for reviewers and update review memorandum (0.6).	3.20	700.00	2,240.00
2/03/25	TT	Review documents as instructed by HM to prepare for phase 2 litigation (8.3); attend daily checkpoint teleconference regarding phase 2 document review (0.3).	8.60	525.00	4,515.00
2/03/25	MV	Organize, prepare, and update internal exhibit list to reflect, Whinstone water invoices as instructed by counsel.	.70	425.00	297.50
2/04/25	EB	Confer with BA and JS regarding high priority action items (0.5); correspond with HM, MV, and NC regarding action items in support of document review and phase 2 exhibit list (0.2); continue analyzing and correspond with BA, JS, and co-counsel regarding [redacted] information in support of damages complaint (0.5); attend teleconference with client and co-counsel (1.5)	2.70	1250.00	3,375.00
2/04/25	BA	Review edits to phase 2 scope reply from J. Cohn and W. Thompson, correspond with JS regarding same, convey revised draft to client for review, correspond with JH regarding cite check of same and review cite check changes, and convey final draft to P. Tomasco and B. Howell for filing (1.5); confer with JS and EB regarding high priority action items including upcoming mediation, damages claims, and phase 2 preparation (0.5); review GMO filings regarding [redacted] and correspond with PB and litigation team regarding witness transcripts in GMO matter (0.2); correspond with EB, MV, PB and team regarding phase 2 exhibits (0.1); correspond with A. Swartz, P. Tomasco and team regarding [redacted] expert (0.1); participate in teleconference with client team, bankruptcy counsel, and litigation counsel to discuss high priority action items, including damages complaint and mediation preparation (1.5).	3.90	1200.00	4,680.00
2/04/25	JS	Attend call with BA and EB regarding high priority action items for phase 2 and damage case (0.5); attend client weekly touch point call (1.0); further review and evaluate issues with damages complaint (1.1).	2.60	1025.00	2,665.00

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/04/25	CS	Continue reviewing documents relevant to [redacted] deposition (2.5).	2.50	850.00	2,125.00
2/04/25	CHH	Targeted searching for CS regarding [redacted] for phase 2 (0.5); daily checkpoint teleconference regarding phase 2 document review (0.3); review twelfth assigned phase 2 document review batch (1.5); begin reviewing thirteenth assigned phase 2 document review batch (0.5); review Quinn document request and begin working on same (0.5).	3.30	350.00	1,155.00
2/04/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	2.00	350.00	700.00
2/04/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review eighth assigned batch of documents for Phase 2 issues (5.5).	5.80	350.00	2,030.00
2/04/25	PB	Attend daily review team status check-in.	.30	850.00	255.00
2/04/25	HM	Review and respond to team correspondence regarding document 2 review (1.1); perform quality check of documents reviewed (0.5); attend daily checkpoint teleconference regarding phase 2 document review (0.3).	1.90	700.00	1,330.00
2/04/25	TT	Attend part of daily checkpoint teleconference regarding phase 2 document review (0.2); Review documents for HM to prepare for phase 2 litigation (9.5).	9.70	525.00	5,092.50
2/04/25	MV	Create and revise various Logikcull searches for target documents for attorneys (2.0); assess court requirements for supplemental exhibit list for Phase 2 (0.7); continue revisions to internal exhibit list and locate, organize, and save potential exhibits (2.5).	5.20	425.00	2,210.00
2/05/25	EB	Attend teleconference with J. Cohn regarding [redacted] analysis in support of complaint (0.4); correspond and confer with Stris team and [redacted] regarding additional materials and analysis in support of same (0.5); review updates and review and respond to correspondence with HM, MV, and litigation fellows regarding document review and exhibit list (0.2); prepare to depose [redacted] (2.5).	3.60	1250.00	4,500.00

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/05/25	BA	Review comments from client team and bankruptcy counsel on draft affirmative complaint, correspond with EB and JS regarding same, and convey edits and comments on same to A. Swartz, W. Thompson, and J. Cohn (1.2); correspond with MV and CH regarding potential exhibits for phase 2 (.1); review correspondence from EB, [redacted] and team regarding potential further analysis by [redacted] regarding buildings C and D, as relevant to damages claims (0.1).	1.40	1200.00	1,680.00
2/05/25	JS	Further work on draft damages complaint and potential Phase 2 issues.	1.60	1025.00	1,640.00
2/05/25	SR	Review and analyze [redacted] report, [redacted] report and materials relied upon in connection with [redacted] inquiries regarding materials needed for additional analysis.	2.50	750.00	1,875.00
2/05/25	CS	Continue reviewing documents for [redacted] deposition and revising deposition outline (1.1)	1.10	850.00	935.00
2/05/25	CHH	Daily checkpoint teleconference regarding phase 2 document review (0.2); review thirteenth assigned phase 2 document review batch (1.5); review fourteenth assigned phase 2 document review batch (2.0); continue working on Quinn document request (0.5).	4.20	350.00	1,470.00
2/05/25	NC	Correspond with EB and HM regarding support for Phase 2 document review (0.2); continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims (1.7).	1.90	350.00	665.00
2/05/25	JH	Attend portion of daily checkpoint teleconference regarding phase 2 document review (0.2); review tenth assigned batch of documents for Phase 2 issues (3.5).	3.70	350.00	1,295.00
2/05/25	PB	Attend daily review team meeting regarding Phase 2 preparation (0.2); prepare transfer of data to co-counsel (0.2); call with CH regarding same (0.1).	.50	850.00	425.00
2/05/25	ASA	Continue review of Phase 2 documents produced by Whinstone and tag with relevant issue tags (4.0); gather relevant expert report material to assist SR with review of [redacted] data sources (0.1).	4.10	350.00	1,435.00

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/05/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review and respond to team correspondence regarding phase 2 document review (0.4); review documents for phase 2 (5.0).	6.00	700.00	4,200.00
2/05/25	TT	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); continue reviewing documents assigned by HM (7.7).	7.90	525.00	4,147.50
2/05/25	MV	Conduct targeted searching for additional exhibits requested by attorneys (1.5); further update internal exhibit list with current potential exhibits and revise in preparation for phase 2 trial (2.0); further revise and add additional documents to deposition list (0.5).	4.00	425.00	1,700.00
2/06/25	EB	Prepare for and lead Stris team meeting regarding high priority action items (0.6); begin reviewing revised draft complaint (0.5).	1.10	1250.00	1,375.00
2/06/25	SR	Continue reviewing and analyzing [redacted] report, [redacted] report and materials relied upon in connection with [redacted] inquiries regarding materials needed for additional analysis (2.6); correspond with PB. EB, and [redacted] regarding the same (0.3); attend teleconference with EB, PB, HM, MV, JHA, CHH, and ASA regarding collection of relevant [redacted] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.5).	3.40	750.00	2,550.00
2/06/25	CS	Continue reviewing documents relevant to [redacted] deposition; continue revising outline for [redacted] deposition (2.1).	2.10	850.00	1,785.00
2/06/25	CHH	Daily checkpoint teleconference regarding phase 2 document review (0.3); review fifteenth assigned phase 2 document review batch (2.0); review sixteenth assigned phase 2 document review batch (2.0); attend teleconference with EB, PB, SR, HM, MV, JHA, and ASA regarding collection of relevant [redacted] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.5).	4.80	350.00	1,680.00
2/06/25	NC	Review first assigned phase 2 document review batch.	2.00	350.00	700.00

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/06/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); re-organize filed exhibits by ECF number at MV request for ease of attorney access (2.0); attend teleconference with EB, PB, SR, HM, MV, JHA, CHH, and ASA regarding collection of relevant [redacted] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.5).	2.70	350.00	945.00
2/06/25	PB	Attend daily review team meeting regarding Phase 2 issues (0.3); attend portion of teleconference with EB, SR, HM, MV, JHA, CHH, and ASA regarding collection of relevant [redacted] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.4).	.70	850.00	595.00
2/06/25	ASA	Daily checkpoint teleconference regarding phase 2 document review (0.3); attend teleconference with EB, PB, SR, HM, MV, JHA, and CHH regarding collection of relevant [redacted] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.5); continue Phase 2 review of documents produced by Whinstone and tag with relevant issue tags (5.1); analyze expert reports of [redacted] and [redacted] for sources of specific power data as requested by EB (1.1).	7.00	350.00	2,450.00
2/06/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review and respond to team correspondence regarding phase 2 document review (1.5); perform quality check of phase 2 document review (1.0); update phase 2 document review memorandum (0.7); attend teleconference with EB, PB, SR, MV, JHA, CHH, and ASA regarding collection of relevant [redacted] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.5).	4.00	700.00	2,800.00
2/06/25	TT	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review documents assigned by HM to support phase 2 litigation (10.5).	10.80	525.00	5,670.00

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/06/25	MV	Continue updating internal exhibit list to add potential exhibits and verify status of exhibits admitted in phase 1 (3.0); attend teleconference with EB, PB, SR, HM, JHA, CHH, and ASA regarding collection of relevant [redacted] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.5).	3.50	425.00	1,487.50
2/07/25	EB	Attend portion of teleconference with client and co-counsel regarding information and next steps in support of finalization of complaint (1.1); attention to regarding action items in light of order setting phase 2 hearing date (0.5).	1.60	1250.00	2,000.00
2/07/25	BA	Participate in teleconference with [redacted], bankruptcy counsel and litigation team regarding affirmative complaint (0.4); participate in teleconference with client team, bankruptcy counsel, and litigation team regarding affirmative complaint and mediation (1.2); confer with JS regarding affirmative complaint and phase 2 proceedings, review phase 2 scheduling order and correspond with client and litigation team to update regarding same, and confer with [redacted] regarding same (0.4).	2.00	1200.00	2,400.00
2/07/25	JS	Attend teleconferences regarding inclusion of certain claims in damages complaint (1.3) and further review and evaluate damages complaint (0.7).	2.00	1025.00	2,050.00
2/07/25	CS	Continue reviewing documents relevant to and revising [redacted] deposition outline.	4.60	850.00	3,910.00
2/07/25	CHH	Confer with PB regarding Quinn Emanuel document request (0.2); daily checkpoint teleconference regarding phase 2 document review (0.6); review seventeenth assigned phase 2 document review batch (2.0); review eighteenth assigned phase 2 document review batch (1.9); review nineteenth assigned phase 2 document review batch (2.0).	6.70	350.00	2,345.00
2/07/25	NC	Daily checkpoint teleconference regarding phase 2 document review (0.6); review second assigned phase 2 document review batch (3.0);	3.60	350.00	1,260.00
2/07/25	JH	Attend part of daily checkpoint teleconference regarding phase 2 document review (0.2); review eleventh assigned batch of documents for Phase 2 issues (3.0).	3.20	350.00	1,120.00
2/07/25	PB	Attend teleconference with CHH regarding production.	.20	850.00	170.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/07/25	ASA	Continue Phase 2 review of documents produced by Whinstone and tag with relevant issue tags.	8.00	350.00	2,800.00
2/07/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.6); review and respond to team correspondence regarding phase 2 document review (1.5); review documents for phase 2 (5.0).	7.10	700.00	4,970.00
2/07/25	TT	Attend daily checkpoint teleconference regarding phase 2 document review (0.6); review documents for HM to prepare for phase 2 litigation (6.8).	7.40	525.00	3,885.00
2/08/25	EB	Analyze and correspond with BA, JS, and co-counsel regarding further revisions to draft complaint (1.6); review update from client and co-counsel and correspond with BA regarding next steps in support of same (0.1).	1.70	1250.00	2,125.00
2/08/25	BA	Review revised draft complaint and correspond with A. Swartz and J. Cohn regarding same (0.4); review correspondence regarding draft complaint and timing of filing and correspond and confer with JS regarding same (0.3).	.70	1200.00	840.00
2/08/25	JS	Evaluate potential inclusion of certain claims in damages complaint.	1.20	1025.00	1,230.00
2/08/25	HM	Review documents for phase 2 (2.5); review and response to document reviewer team correspondence regarding phase 2 document review (0.5).	3.00	700.00	2,100.00
2/08/25	TT	Review documents as assigned by HM to support upcoming phases of trial and claims.	4.20	525.00	2,205.00
2/09/25	EB	Review and respond to team correspondence regarding phase 2 document review and expert depositions.	.10	1250.00	125.00
2/09/25	BA	Review further correspondence regarding filing of affirmative complaint, review additional client comments on same and correspond with A. Swartz regarding edits to and attachments to same.	.30	1200.00	360.00
2/09/25	JS	Further evaluate potential inclusion of certain claims in damages complaint.	.80	1025.00	820.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/09/25	CHH	Review twentieth assigned phase 2 document review batch (0.8); review twenty-first assigned phase 2 document review batch (0.8); review twenty-second assigned phase 2 document review batch (0.8); review twenty-third assigned phase 2 document review batch (0.8).	3.20	350.00	1,120.00
2/09/25	TT	Continue reviewing assigned documents.	1.50	525.00	787.50
2/10/25	VO	Correspond with client and team regarding damages analysis in advance of mediation.	.40	1025.00	410.00
2/10/25	EB	Continue preparing for [redacted] expert deposition (2.7); correspond with CS regarding next steps in support of same (0.1); correspond with Stris Team and W. Thompson regarding and continue assisting with additional analysis and document searching in support of damages complaint (0.4); advise TB regarding adequate assurance research and analysis TB (0.2); attend teleconference with PB, SR, and [redacted] regarding additional documentation and analysis in support of [redacted] damages (0.3); attend to high priority phase 2 action items resulting from scope order including staffing, witness preparation planning, document and transcript review, and exhibit list updates and revisions (3.0).	6.70	1250.00	8,375.00
2/10/25	BA	Review second interim order addressing scope of phase 2 (0.3); prepare for phase 2 hearing, including reviewing evidence and potential exhibits, approving new production, and corresponding and conferring with bankruptcy and litigation team regarding strategy, potential briefing, depositions, and witnesses (2.5); review email from T. Schmeltz regarding special committee and correspond with JS regarding same (0.2).	3.00	1200.00	3,600.00
2/10/25	JS	Begin preparing plan for witnesses, exhibits, and briefing for Phase 2 in light of ruling from court.	6.30	1025.00	6,457.50
2/10/25	SR	Attend videoconference with EB, PB, and [redacted] regarding materials needed for additional analysis.	.30	750.00	225.00
2/10/25	TB	Call with E. Brannen regarding question on assumption of contracts; research regarding assumption of contracts in bankruptcy and review of sources (3.6).	3.80	1200.00	4,560.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/10/25	CS	Review and analyze court order regarding phase two of the motion to assume (0.6); begin reviewing damages complaint and review and respond to email communications regarding the same (1.5); review and analyze documents relevant to Winter Storm Uri energy credits(2.2); continue analyzing [redacted] deposition outline (0.7).	5.00	850.00	4,250.00
2/10/25	CHH	Review twenty-fourth assigned phase 2 document review batch (0.7); review twenty-fifth assigned phase 2 document review batch (0.7); review twenty-sixth assigned phase 2 document review batch (0.7); targeted searching regarding Winter Storm Uri settlement and summarize results from same to EB (0.5); attend daily checkpoint teleconference regarding phase 2 document review (0.2); review twenty-seventh assigned phase 2 document review batch (0.7); review twenty-eighth assigned phase 2 document review batch (0.7); review twenty-ninth assigned phase 2 document review batch (0.7); perform quality control checks regarding phase 2 review batches (0.1); prepare and finalize debtors' production set 19 (0.2).	5.10	350.00	1,785.00
2/10/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.80	350.00	630.00
2/10/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review twelfth assigned batch of documents for Phase 2 issues (5.0).	5.20	350.00	1,820.00
2/10/25	PB	Attend daily review team check in regarding Phase 2 preparation (0.2); preparation for Phase 2 trial (3.1); teleconference with EB, SR, and potential expert (0.3).	3.60	850.00	3,060.00
2/10/25	ASA	Review documents produced by Whinstone and apply Phase 2 issue tags (3.6); collect [redacted] and exhibits at request of EB in support of [redacted] project (0.5); attend daily checkpoint teleconference regarding phase 2 document review (0.2); conduct targeted search for specific Whinstone invoices billed to client (0.6); review Phase 2 documents flagged during quality control and assign appropriate tags (1.2).	6.10	350.00	2,135.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/10/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review and respond to team correspondence regarding phase 2 document review (1.0); review documents for phase 2 (1.1).	2.30	700.00	1,610.00
2/10/25	TT	Attend daily checkpoint teleconference regarding phase 2 litigation (.2); review documents for HM to prepare for phase 2 litigation (4.7); review [redacted] for EB in support of fraud claim in phase 2 (3.5).	8.40	525.00	4,410.00
2/10/25	MV	Perform additional tarteged searches for email as requested by attorneys (0.5); revise further, review hits, and update team (0.5).	1.00	425.00	425.00
2/11/25	VO	Confer with JS regarding settlement dynamics and strategy (0.7); emails with client and team regarding same (0.4).	1.10	1025.00	1,127.50
2/11/25	EB	Continue preparing to depose [redacted] expert (2.3); confer with CS, ASA, and JHA regarding preparation of exhibits for same and pretrial motions (0.2); attend teleconference with PB, HM, TT, CHH, JHA, and ASA to advise regarding high-priority Phase 2 action items (0.5); assist with final review and correspond with Stris team and co-counsel regarding finalization of damages complaint and accompanying documents and advise Stris team members regarding additional document searching and analysis in support of same (2.0); attend portion of checkpoint teleconference with BA, JS, clients, and co-counsel (1.2).	6.20	1250.00	7,750.00
2/11/25	BA	Participate in teleconference with client team and litigation team to discuss mediation and phase 2 preparation (1.2); confer with CS regarding phase 2 motion in limine, correspond with JS and litigation team regarding phase 2 preparation and meet and confer with opposing counsel, and correspond with opposing counsel regarding depositions and conferral (0.3).	1.50	1200.00	1,800.00
2/11/25	JS	Continue planning for witnesses, exhibits, depositions, and briefing for Phase 2 in light of court order (6.0) and attend portion of client touchpoint call (1.3).	7.30	1025.00	7,482.50

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Date	Tkpr	Description	Hours	Rate	Amount
2/11/25	TB	Research regarding bankruptcy law requirements for establishing adequate assurance and when that is necessary; call with J. Stokes regarding specific parameters of adequate assurance issue.	6.80	1200.00	8,160.00
2/11/25	CS	Attend teleconference with EB, JHA, and ASA to discuss tasks in support of the deposition of Whinstone's expert [redacted] (0.2); meet with BA to discuss motion in limine to file in advance of Phase 2 hearing on motion to assume (0.2); beginning reviewing filings and background materials in preparation for drafting motion in limine (3.8); continue reviewing and analyzing damages complaint (0.8).	5.00	850.00	4,250.00
2/11/25	CHH	Attend teleconference with EB, PB, HM, TT, JHA, and ASA regarding high-priority Phase 2 action items (0.5); assist EB with targeted searching regarding ancillary invoices (0.5).	1.00	350.00	350.00
2/11/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.90	350.00	665.00
2/11/25	JH	Attend teleconference with EB, CS, JHA, and ASA to discuss tasks in support of the deposition of Whinstone's expert [redacted] (0.2); attend teleconference with EB, PB, HM, TT, CHH, JHA, and ASA regarding high-priority Phase 2 action items (0.5); assist MV, EB and A. Swartz (LKC) in verifying the confidentiality of given filings in support of Rhodium's damages complaint (2.0).	2.90	350.00	1,015.00
2/11/25	PB	Prepare for Phase 2 trial.	4.30	850.00	3,655.00
2/11/25	ASA	Finish review of Phase 2 documents produced by Whinstone flagged during quality control and assign appropriate tags (2.5); attend teleconference with EB, PB, HM, TT, JHA, and CHH regarding high-priority Phase 2 action items (0.5); attend teleconference with EB, CS, and JHA to discuss tasks in support of the deposition of Whinstone's expert [redacted] (0.2); assist with review of orders issued by the arbitrator and Phase 1 trial exhibits in support of preparing damages complaint exhibits (1.5).	4.70	350.00	1,645.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/11/25	HM	Attend teleconference with EB, PB, TT, CHH, JHA, and ASA regarding high-priority Phase 2 action items (0.5); review and analyze hot documents for potential use in Phase 2 hearing and affirmative damages case (2.4).	2.90	700.00	2,030.00
2/11/25	TT	Attend teleconference with EB, PB, HM, CHH, JHA, and ASA regarding high-priority Phase 2 action items (0.5); analyze related materials and summarize [redacted] testimony of [redacted] in preparation for phase 2 (8.5); review and Analyze additional [redacted] in preparation for phase 2 (2.0).	11.00	525.00	5,775.00
2/11/25	MV	Create and revise Logikcull various target searches for documents, review hits, correspondence regarding the same (2.0); correspondence with paralegal regarding filing of Phase 2 exhibits and exhibit list, review current documents (0.2); search of previously filed exhibit list and confirm exhibits filed under seal, correspondence regarding the same (0.8).	3.00	425.00	1,275.00
2/12/25	VO	Prepare for mediation (0.8); review emails from client regarding same (0.2); confer with JS regarding same (0.3).	1.30	1025.00	1,332.50
2/12/25	EB	Continue working on and advising Stris team regarding high priority action items in support of phase 2 and damages claim including exhibit list and document searching and analysis (5.3); review and respond to correspondence from [redacted] and update PS, BA, and JS regarding same (0.1).	5.40	1250.00	6,750.00
2/12/25	BA	Continue preparing for mediation and phase 2 of the hearing, including reviewing analyses of outstanding invoices, reviewing potential exhibits, conferring with JS, PB, HM, and EB regarding strategy and preparation, conferring with A. Peloubet regarding status of invoices and hearing preparation, and correspond with P. Tomasco and team regarding hearing date and attempts to confer with opposing counsel.	1.80	1200.00	2,160.00
2/12/25	JS	Prepare for mediation (2.3) and for Phase 2 of assumption litigation (3.5).	5.80	1025.00	5,945.00
2/12/25	SR	Review energy consumption data in connection with [redacted] request and correspond with [redacted] regarding the same.	1.50	750.00	1,125.00
2/12/25	TB	Review case law regarding adequate assurance and write results of research.	3.60	1200.00	4,320.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/12/25	CS	Begin drafting motion in limine regarding ancillary services charges; review and analyze case law relevant to the same (5.4).	5.40	850.00	4,590.00
2/12/25	CHH	Email HM regarding phase 2 document review (0.1); assist EB with targeted searching in support of phase 2 (1.0).	1.10	350.00	385.00
2/12/25	PB	Preparation for trial Phase 2.	7.50	850.00	6,375.00
2/12/25	ASA	Gather relevant Court orders and recently filed damages complaint and send to Rhodium expert [redacted] (0.6); update internal memorandum to reflect recent case activity (0.7); compile and organize invoices requested by PB to assist with attorney review (0.2); research [redacted] information requested by EB in support of deposition preparation (2.7).	4.20	350.00	1,470.00
2/12/25	HM	Review, analyze, and prepare documents and potential exhibits for phase 2 hearing.	6.10	700.00	4,270.00
2/12/25	TT	Analyze and summarize materials for EB regarding Building D.	8.80	525.00	4,620.00
2/12/25	MV	Conduct further targeted searches for hot documents as requested by attorneys.	2.00	425.00	850.00
2/13/25	VO	Attend zoom meeting with team regarding phase 2 trial planning and mediation planning (1.5); emails with team regarding mediation position statement (0.2).	1.70	1025.00	1,742.50
2/13/25	PS	Attend internal meeting regarding high priority action items in support of mediation and phase 2 hearing (1.5); confer with individual team members regarding next steps (0.9).	2.40	1450.00	3,480.00
2/13/25	BA	Attend Stris team meeting regarding high priority action items in support of mediation and phase 2 hearing preparation (1.5); correspond with P. Tomasco, JS, EB, and CS regarding mediation position statement and with CS regarding pretrial motion in limine for phase 2 (0.2); review and analyze research and correspondence regarding privilege issues and correspond with litigation team regarding same (0.5).	2.20	1200.00	2,640.00
2/13/25	JS	Continue preparation for mediation (2.0) and Phase 2 of assumption litigation (5.5).	7.50	1025.00	7,687.50

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Date	Tkpr	Description	Hours	Rate	Amount
2/13/25	SR	Attend portion of Stris team meeting regarding high priority action items in support of mediation and phase 2 hearing preparation (0.5); conduct document review regarding energy consumption data in connection with [redacted] request and team correspondence regarding the same (3).	3.50	750.00	2,625.00
2/13/25	TB	Begin research regarding third-party information sharing requested by EB.	2.40	1200.00	2,880.00
2/13/25	CS	Attend portion of Stris team meeting regarding high priority action items in support of mediation and phase 2 hearing preparation (0.6); continue drafting motion in limine for phase 2 hearing (4.0); draft mediation statement (4.9).	9.50	850.00	8,075.00
2/13/25	CHH	Draft memorandum regarding targeted search findings in support of phase 2 (1.5); attend daily checkpoint teleconference regarding phase 2 document review (0.5); attend portion of Stris team meeting regarding high priority action items in support of mediation and phase 2 hearing preparation (0.5);	2.50	350.00	875.00
2/13/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.70	350.00	595.00
2/13/25	JH	Attend teleconference with PS, EB, BA, JS, VO, CS, PB, SR, CHH, MV, JHA, and ASA regarding strategic and high-priority Phase 2 action items (0.5); attend teleconference with HM, TT, CHH, ASA, and NC to discuss the collection of documents tagged in the phase 2 review and found via targeted search that are related to outstanding or contested invoices from Whinstone (0.6); begin collecting documents tagged in the phase 2 review and found via targeted search that are related to outstanding or contested invoices from Whinstone (2.0).	3.10	350.00	1,085.00
2/13/25	JH	Review Bankruptcy trial transcripts to determine which of the exhibits filed under seal were admitted under seal, rather than admitted publicly, for PB review.	2.20	350.00	770.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/13/25	PB	Preparation for trial Phase 2, including analysis of exhibits admitted in Phase 1 (3.9); attend teleconference with PS, EB, BA, JS, VO, CS, SR, CHH, MV, JHA, and ASA regarding strategic and high-priority Phase 2 action items and follow-on call regarding mediation strategy (1.5).	5.40	850.00	4,590.00
2/13/25	ASA	Analyze invoices and conduct targeted searches for supporting documentation at request of HM in support of Phase 2 preparation efforts (7.0); attend daily checkpoint teleconference regarding phase 2 document review (0.5); attend portion of Stris team meeting regarding high priority action items in support of mediation and phase 2 hearing preparation (0.5).	8.00	350.00	2,800.00
2/13/25	HM	Review, analyze, and prepare documents and potential exhibits for phase 2 hearing.	9.50	700.00	6,650.00
2/13/25	TT	Attend daily checkpoint teleconference with HM, ASA, EB, JHA, to prepare for phase 2 targeted document review (0.4); analyze and summarize additional [redacted] for EB in preparation for phase 2 (11.0).	11.00	525.00	5,775.00
2/13/25	MV	Provide attorney CS with requested filed versions of exhibits in support of upcoming deposition (1.5); attend teleconference with PS, EB, BA, JS, VO, CS, PB, SR, CHH, JHA, and ASA regarding strategic and high-priority Phase 2 action items (0.5); conduct additional target searches for documents related to disputed invoices, review hits, correspond with team regarding the same, and save for further attorney review (4.0).	6.00	425.00	2,550.00
2/14/25	EB	Review, propose revisions to, and correspond with Stris team and co-counsel regarding mediation brief (0.5); review updates from TT and attend to high priority phase 2 action items including analysis in support of cross-examinations (1.2).	1.70	1250.00	2,125.00
2/14/25	BA	Review and revise draft mediation statement prepared by CS, correspond with JS regarding strategy for same, and and review further edits from JS and P. Tomasco (2.4); draft proposed response to Whinstone's counsel regarding phase 2 hearing, correspond with litigation team regarding same, and convey same to M. Moore (0.7).	3.10	1200.00	3,720.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/14/25	BA	Participate in teleconference with [redacted] and PB to assess status of invoices as relevant to preparation for phase 2 hearing.	.40	1200.00	480.00
2/14/25	JS	Work on mediation preparation and related issues.	2.20	1025.00	2,255.00
2/14/25	SR	Continue conducting document review regarding energy consumption data in connection with [redacted] request (0.8); continue reviewing and analyzing materials and drafting notes in support of [redacted] claims, damages, and expert analysis (4.2).	5.00	750.00	3,750.00
2/14/25	TB	Continue research regarding regarding third party disclosures for EB and JS.	2.40	1200.00	2,880.00
2/14/25	CS	Continue drafting and revising mediation statement (1.6); continue drafting motion in limine for phase 2 hearing (1.5)	3.10	850.00	2,635.00
2/14/25	CHH	Attend daily checkpoint teleconference regarding phase 2 document review (0.6); update targeted search findings memorandum in support of phase 2 (0.5); attend teleconference regarding invoices with [redacted] (Rhodium), PB, BA, and ASA (0.4); assist HM with invoice review in support of phase 2 (3.5); review JS email regarding Quinn Emanuel document request and continue working on same (0.2).	5.20	350.00	1,820.00
2/14/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	5.30	350.00	1,855.00
2/14/25	JH	Attend teleconference with HM, TT, CHH and ASA to discuss the collection of documents tagged in the phase 2 review and found via targeted search that are related to outstanding or contested invoices from Whinstone (0.5); continue collecting documents tagged in the phase 2 review and found via targeted search that are related to outstanding or contested invoices from Whinstone (4.0); distribute updated exhibit list tracking which exhibits from Bankruptcy Phase 1 were admitted under seal or publicly to attorney team at PB request (0.5).	4.00	350.00	1,400.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/14/25	PB	Preparation for trial Phase 2 (3.6); teleconference with [redacted], BA, and ASA regarding Phase 2 issues (0.4); attend internal discovery team meeting regarding Phase 2 issue analysis (0.5).	4.50	850.00	3,825.00
2/14/25	ASA	Attend teleconference regarding invoices with [redacted] (Rhodium), Ashley Jonson (Rhodium), PB, BA, and CHH (0.4); conduct targeted searches for invoice documentation and assist HM with drafting of memorandum in support of phase 2 preparation efforts (5.7); gather privilege log material at request of PB (0.2).	6.30	350.00	2,205.00
2/14/25	HM	Review, analyze, and prepare documents and potential exhibits for phase 2 hearing.	5.50	700.00	3,850.00
2/14/25	TT	Attend daily checkpoint teleconference with HM, PB, JH, CH, AA regarding phase 2 targeted invoice searches (0.6); continue analyzing and summarize [redacted] testimony regarding [redacted] for EB (7.1).	7.70	525.00	4,042.50
2/14/25	MV	Qc internal document with exhibit admission tracker (0.2); assist with further targeted searches for attorney review (0.3).	.50	425.00	212.50
2/15/25	EB	Review and analyze memorandum from co-counsel and related materials and correspond with BA, TB, and JS regarding next steps in support of assessment of action items resulting from same.	1.50	1250.00	1,875.00
2/15/25	BA	Review analysis of potential phase 2 invoices prepared by HM to prepare for phase 2 trial.	.30	1200.00	360.00
2/15/25	JS	Prepare for presentation to Special Committee regarding damages complaint.	3.50	1025.00	3,587.50
2/15/25	TB	Consider issues and engage in further legal research regarding third party disclosures.	1.60	1200.00	1,920.00
2/15/25	HM	Finalize and circulate phase 2 invoice document analysis memorandum in preparation for the phase 2 hearing.	1.50	700.00	1,050.00
2/16/25	EB	Review and correspond with HM regarding memorandum analyzing phase 2 invoices and related documents (0.3); review and respond to further correspondence from BA, TB, JS, and co-counsel regarding research and update to [redacted] (0.5).	.80	1250.00	1,000.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/16/25	BA	Review draft memorandum from LKC regarding privilege issues and correspond with JS, EB, and TB regarding strategy and potential issues relevant to privilege concerns.	.40	1200.00	480.00
2/16/25	JS	Prepare for (1.5) and confer (0.8) with Special Committee regarding potential damages claims; attend board meeting regarding mediation (2.3); work on mediation follow-up (1.0).	5.60	1025.00	5,740.00
2/16/25	TB	Review memorandum regarding third party disclosures and advise regarding duties of directors.	2.80	1200.00	3,360.00
2/17/25	VO	Confer with PS, EB, and JS regarding mediation and strategy (0.6); confer with JS regarding same (0.4).	1.00	1025.00	1,025.00
2/17/25	PS	Attend teleconference with EB, VO, and JS regarding mediation preparation and case strategy.	.60	1450.00	870.00
2/17/25	EB	Continue working on high priority phase 2-related action items including assessing materials for cross-examination and materials relating to invoices (5.0); review and correspond with BA and JS regarding analysis from TT regarding Building D [redacted] (0.4); attend teleconference with PS, VO, and JS regarding mediation preparation and case strategy (0.6); confer with TT regarding transcript analysis in support of phase 2 cross-examinations (0.2); attend teleconference with BA, JS, PB, and co-counsel to prepare for meet and confer (0.5); correspond with BA, VO, JS, co-counsel and clients regarding mediation preparation (0.1); review and correspond with BA, VO, JS, and LKC co-counsel regarding revisions to objection to Whinstone proof of claim (0.3).	7.10	1250.00	8,875.00
2/17/25	BA	Participate in teleconference with JS, EB, PB, and P. Tomasco to prepare for meet and confer with Whinstone's counsel regarding phase 2 hearing (0.5); participate in meet and confer with Whinstone's counsel regarding phase 2 hearing (0.4); review and revise draft objection to Whinstone's proof of claim, correspond with litigatoin team regarding same, and correspond with P. Tomasco regarding edits to same (0.5); continue preparing for mediatoin and phase 2 hearing, including reviewing deposition [redacted] analyses, conferring with JS regarding hearing strategy, and correspond with JS, PB, and EB regarding potential phase 2 issues (2.2).	3.60	1200.00	4,320.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/17/25	JS	Assist in preparation for mediation (2.3) and prepare for Phase 2 trial (1.4).	3.70	1025.00	3,792.50
2/17/25	TB	Analyze additional documents and research regarding third party information sharing.	2.40	1200.00	2,880.00
2/17/25	CS	Continue drafting motion in limine for Phase 2 hearing.	6.90	850.00	5,865.00
2/17/25	PB	Prepare for Phase 2 hearing, including preparation of testimony of [redacted] and compilation of exhibits and cross-examination material (4.8); teleconference with JS, BA, EB, P. Tomasco, and J. Cohn regarding mediation and key Phase 2 action items (0.5).	5.30	850.00	4,505.00
2/17/25	TT	Confer with EB to coordinate review and summary of [redacted] regarding phase 2 (0.2); continue analysis and summary of prior [redacted] testimony of two [redacted] witnesses (6.0).	6.20	525.00	3,255.00
2/18/25	VO	Attend mediation planning call with client representatives and co-counsel (0.6); prepare for mediation (4.3).	4.90	1025.00	5,022.50
2/18/25	EB	Attend teleconference with VO, clients, and co-counsel to prepare for mediation (0.5); continue assisting with information and analysis in support of same (1.2); review and analyze additional documents and correspondence from MV and CHH regarding [redacted] invoice and correspond with [redacted] and Stris team regarding follow-up questions regarding same (0.9); continue working on additional high priority phase 2 action items (2.0); attend phase 2 document review checkpoint teleconference to advise regarding additional action items (0.7); coordinate hot seat and graphics support for phase 2 (0.2).	5.50	1250.00	6,875.00
2/18/25	BA	Prepare for mediation and phase 2 hearing.	1.00	1200.00	1,200.00
2/18/25	JS	Assist in preparation for mediation (1.3); attend teleconference regarding exit financing issues (1.1); prepare for Phase 2 trial (1.5).	3.90	1025.00	3,997.50

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Date	Tkpr	Description	Hours	Rate	Amount
2/18/25	SR	Continue reviewing and analyzing materials and drafting notes in support of [redacted] claims, damages, and expert analysis (3.7); review and analyze EB and [redacted] correspondence relating to [redacted] invoices in connection with the same (0.9); review correspondence and correspond with CHH regarding latest [redacted] calculations to assist EB (0.3).	4.90	750.00	3,675.00
2/18/25	CS	Begin drafting Phase 2 opening slides (2.5); review and potential exhibits for Phase 2 hearing (1.2)	3.70	850.00	3,145.00
2/18/25	CHH	Assist EB, BA, and JS with targeted searching regarding curtailments in support of phase 2 (1.0); update internal targeted searching memorandum in light of same (0.2); attend daily checkpoint teleconference with EB, PB, and HM regarding phase 2 document review (0.7); assist EB, PB, and HM with further targeted searching in light of same (1.5); assist PB with [redacted] (Rhodium) direct preparations (0.1).	3.50	350.00	1,225.00
2/18/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.20	350.00	420.00
2/18/25	PB	Attend daily checkpoint teleconference with EB, PB, HM, and CH regarding phase 2 document review (0.7); follow-up call with CH regarding same (0.3); draft direct examination outline for Phase 2 testimony (3.8).	4.80	850.00	4,080.00
2/18/25	ASA	Assist EB by gathering relevant analysis by expert [redacted] (0.4); update internal detailed tracking memorandum (0.3); search for and identify documentation related to Phase 2 invoices (0.3).	1.00	350.00	350.00
2/18/25	HM	Attend daily checkpoint teleconference with EB, PB, HM, and CH regarding phase 2 document review (0.7); revise and continue drafting phase 2 invoices analysis memorandum (6.0).	6.70	700.00	4,690.00
2/18/25	SD	Print and compile materials for mediation session (1.1); compile mediation materials into an e-binder (0.8).	1.90	350.00	665.00
2/18/25	TT	Continue analyzing and summarizing prior [redacted] testimony for EB in support of phase 2 trial preparation.	8.80	525.00	4,620.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/18/25	MV	Further update and revise internal exhibit list (1.0); further review admitted trial exhibits used in Phase 1 and update official Phase 2 exhibit list regarding the same (0.5).	1.50	425.00	637.50
2/19/25	VO	Attend mediation.	9.00	1025.00	9,225.00
2/19/25	PS	Review Whinstone's emergency motion to continue phase 2 and confer with team regarding same and mediation updates.	2.40	1450.00	3,480.00
2/19/25	EB	Attend teleconference with PB regarding action items including additional phase 2 exhibit searches (0.2); review and comment on draft [redacted] direct examination [redacted] (0.9); attention to case management and upcoming hearing staffing (0.4); analyze additional information from [redacted] regarding [redacted] invoice and correspond with [redacted] regarding follow-up requests (1.1); attend teleconference with SR regarding high priority [redacted] and phase 2 action items (0.2); correspond with Stris team and co-counsel regarding high priority action items including [redacted] deposition (0.2); prepare for same (1.5); attend teleconference with PB regarding phase 2 witness preparation and exhibits (1.0); prepare Rhodium witness preparation materials (1.9); review, propose revisions, and correspond with BA and PB regarding motion in limine (0.7); review mediation updates and correspond with Stris team members and Fulcrum regarding status and resulting action items (0.2).	8.30	1250.00	10,375.00
2/19/25	BA	Attend and participate in mediation (6); review and revise motion in limine for phase 2 and correspond and confer with team regarding same (2.8); review Whinstone's motion to continue hearing, confer with team regarding same, and begin drafting opposition to same (1.2).	10.00	1200.00	12,000.00
2/19/25	JS	Prepare for Phase 2 trial.	2.20	1025.00	2,255.00
2/19/25	SR	Confer with EB regarding [redacted] and phase 2 high priority action items (0.2); review team and [redacted] correspondence and documents pertaining to [redacted] invoices and June 10, 2023 mining in connection with [redacted] phase 2 and damages analysis (0.7)	.90	750.00	675.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/19/25	CS	Review and analyze emergency motion to continue Phase 2 hearing (0.5); draft section of response to motion to continue (2.0); continue drafting Phase 2 opening slides (0.6); review edits to and revise motion in limine (2.1); prepare exhibits, declaration, and proposed order granting motion in limine (1.3) finalize and file motion in limine and supporting materials (1.4).	7.90	850.00	6,715.00
2/19/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	2.10	350.00	735.00
2/19/25	PB	Preparation for Phase 2 trial (4.9); teleconference with EB regarding priority discovery items (0.2); teleconference with EB regarding key Phase 2 preparation issues (1.0); teleconference with JS regarding preparation for Phase 2 opening (0.3).	6.40	850.00	5,440.00
2/19/25	ASA	Support mediation efforts of attorneys ahead of Phase 2 hearing (6.5); review Whinstone's motion to continue hearing and draft shell of opposition to same at request of BA (1.0); revise internal tracking memorandum to reflect case updates and relevant preparatory material ahead of Phase 2 hearing (0.5).	8.00	350.00	2,800.00
2/19/25	HM	Revise phase 2 invoice analysis memorandum (3.6); review and analyze documents for EB (1.5).	5.10	700.00	3,570.00
2/19/25	TT	Analyze and summarize [redacted] testimony of Whinstone witness for EB in preparation for phase 2 (9.0).	9.00	525.00	4,725.00
2/19/25	MV	Further revise internal exhibit list to cover documents cited in draft motion in limine (4.0); correspond with QE paralegal regarding exhibit list requirements (0.1); create further targeted searches, review hits, and correspond with attorneys regarding same (2.0); pull additional documents for attorneys to be used as Phase 2 trial exhibits (0.4).	6.50	425.00	2,762.50

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Date	Tkpr	Description	Hours	Rate	Amount
2/20/25	PS	Prepare for (1.4) and attend (0.7) teleconference with EB, CS, PB, SR, HM, and MV regarding action items in support of emergency hearing and phase 2 imminent deadlinesreview draft opposition to Whinstone motion and email EB and team (0.4); attend portion of zoom with EB, BA, JS, and PB regarding high priority action items (0.4).	2.90	1450.00	4,205.00
2/20/25	EB	Confer with NC regarding status and revisions to [redacted] memorandum (0.1); attend teleconference with PS, CS, PB, SR, HM, and MV regarding action items in support of emergency hearing and phase 2 imminent deadlines (1.1); confer and review and respond to correspondence with Stris team and co-counsel regarding emergency hearing and high priority action items including phase 2 contingency preparations (0.5); attend to same in consultation with Stris team and co-counsel (3.5); correspond with opposing counsel regarding Peters deposition and phase 2 agreement memorialization (); attend teleconference with BA, JS, PB, P. Tomasco, and other fiduciaries with SAFE representatives regarding mediation strategy (0.7); attend further Stris team teleconference regarding high priority action items (0.6); confer with BA, JS, and P. Tomasco regarding action items including revisions to phase 2 order and client update and convey same (0.9).	7.30	1250.00	9,125.00
2/20/25	BA	Continue drafting opposition to motion to continue and preparing for phase 2 hearing if needed, including conferring with EB regarding same and conferring with CS regarding filings (1); correspond and confer with CS regarding potential filing of opposition to Whinstone's continuance motion and potential hearing on motion in limine and confer with EB regarding potential hearing on motion in limine/status conference (0.2); participate in teleconference with P. Tomasco, mediator Mullin, SAFE representations and client representatives to discuss mediation (0.7); confer with EB, PB, JS, and PS regarding offer from SAFEs/Riot and next steps (0.6); confer with EB, P. Tomasco, and JS regarding upcoming status conference, steps to finalize agreement regarding phase 2, and mediation/offer (1); correspond with litigation and bankruptcy team regarding Rhodium and Whinstone's proposals to document agreement regarding phase 2 and (0.4).	3.90	1200.00	4,680.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/20/25	JS	Attend call with SAFE group and Debtor team regarding Riot settlement offer (0.8); evaluate and move forward next steps in light of same (0.7).	1.50	1025.00	1,537.50
2/20/25	SR	Continue reviewing and analyzing materials and drafting notes in support of [redacted] claims, damages, and expert analysis (4.1); attend teleconference with PS, EB, CS, PB, HM, and MV regarding action items in support of emergency hearing and phase 2 imminent deadlines (1.1); review and revise Opposition to Whinstone's Continuance Motion (0.4).	5.60	750.00	4,200.00
2/20/25	CS	Attend teleconference with PS, EB, CS, PB, SR, HM, and MV regarding action items in support of emergency hearing and phase 2 imminent deadlines (1.1); review and revise opposition to motion to continue (2.2); draft declaration in support of opposition to motion to continue phase 2 hearing and compile exhibits in support of the same (1.1); review motion in limine to prepare for hearing regarding the same (0.4); continue preparing Phase 2 opening slides (0.3).	5.10	850.00	4,335.00
2/20/25	NC	Confer with EB regarding case status and high priority action items (0.1); add additional materials and continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims (1.5).	1.60	350.00	560.00
2/20/25	PB	Preparation for Phase 2 trial, including exhibits and drafting direct examination outline (3.5); attend portion of teleconference with PS, EB, CS, SR, HM, and MV regarding action items in support of emergency hearing and Phase 2 imminent deadlines (0.7); attend teleconference with Ad Hoc Group regarding mediation (0.7); attend follow-up call with EB, JS, BA, and PS regarding same (0.6); teleconference with R. Izakelian, R. Lopez, and R. Vasquez regarding document transfer (0.2).	5.70	850.00	4,845.00
2/20/25	ASA	Create witness preparation PowerPoint at request of PB.	1.50	350.00	525.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/20/25	HM	Attend teleconference with PS, EB, CS, PB, SR, HM, and MV regarding action items in support of emergency hearing and phase 2 imminent deadlines (1.1); review and revise [redacted] deposition outline (1.0); revise phase 2 invoices analysis memorandum (1.2); review and analyze documents for phase 2 exhibit list (1.1).	4.40	700.00	3,080.00
2/20/25	MV	Continue revising exhibit list and preparing additional exhibits (3.0); review confidentiality designations and prepare exhibit cover sheets for filing (0.5); conduct additional searches for bates versions of invoices (0.5); attend teleconference with PS, EB, CS, PB, SR, HM regarding action items in support of emergency hearing and phase 2 imminent deadlines (1.1).	5.60	425.00	2,380.00
2/21/25	PS	Confer with team and plan for damages case.	.90	1450.00	1,305.00
2/21/25	EB	Confer with SR regarding high priority action items in wake of phase 2 resolution (0.2); confer with and advise Stris team members including JS, CS, and TT regarding same (0.4); attend hearing (0.1); attention to resulting action items including correspondence with co-counsel and opposing counsel and revisions to agreed order (2.6).	3.30	1250.00	4,125.00
2/21/25	BA	Prepare for and participate in status conference/hearing to discuss phase 2 issues (0.5); review draft proposed agreed orders and correspond with team regarding same (0.3).	.80	1200.00	960.00
2/21/25	JS	Continue planning for damages case.	1.50	1025.00	1,537.50
2/21/25	SR	Confer with EB regarding high priority action items in support of damages analysis and in wake of phase 2 resolution (0.2); continue reviewing materials and drafting notes in connection with the same (6.7).	6.90	750.00	5,175.00
2/21/25	CS	Attend hearing on motion to continue and motion in limine (0.2); review and revise proposed agreed order on motion to assume contracts and exhibit thereto (1.0); research statute of limitations issues for damages complaint and begin drafting memorandum regarding the same (2.9).	4.10	850.00	3,485.00
2/21/25	PB	Attend hearing regarding Phase 2 trial scheduling.	.30	850.00	255.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/21/25	ASA	Assist EB with formatting and finalizing of proposed agreed order granting Debtors' motion and supplemental motion to assume certain executory contracts with Whinstone US, Inc. prior to filing (2.0); at request of PB, excerpt relevant portions of bates-stamped documents for use in witness preparation PowerPoint (0.7); update internal status memorandum to reflect agreement and cancellation of Phase 2 hearing (0.2).	2.90	350.00	1,015.00
2/21/25	HM	Review and analyze hot documents identified in phase 2 document review.	.60	700.00	420.00
2/21/25	SD	Prepare materials for BA for 02-21-2025 hearing (0.3).	.30	350.00	105.00
2/22/25	SR	Continue reviewing materials and drafting notes in support of [redacted] claims, damages, and expert analysis	4.90	750.00	3,675.00
2/24/25	EB	Confer with W. Thompson (0.2) and JS (0.5) regarding status and high priority action items; attend teleconferences with [redacted] (0.8) regarding same and BA (0.3) regarding high priority research action items; advise TB and CS regarding research questions regarding appeal and damages complaint (0.5); attend teleconference with Stris team and A. Swartz regarding document and discovery related action items (1.1); review updates and correspond with TB and CS regarding follow-up questions (0.1); attention to case management (0.5); review updates and correspond with HM regarding [redacted] (0.1); review notice of appeal and update [redacted] regarding same (0.1); attention to resulting action items including corresponding with TB regarding additional analysis and next steps regarding same (0.3).	.40	1250.00	500.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/24/25	BA	Review order entered on motion to assume, convey same to client, correspond with PS, JS, and EB regarding potential appeal of order on motion to assume, review appeal documents filed by Whinstone, and review research on same from TB (0.4); confer with EB regarding high priority action items including appeal and document review for adversary proceeding (0.3); participate in teleconference with EB, JS, PB, HM, and A. Swartz to discuss high priority action items, including appeal of order on motion to assume and discovery matters related to adversary proceeding (1.1); review draft notice of appearance for adversary proceeding and correspond with team regarding same (0.1).	1.90	1200.00	2,280.00
2/24/25	JS	Call with EB regarding high priority action items in connection with settlement and damages case (0.5); call with EB, BA, PS, HM, SR, and A. Schwartz regarding document discovery issues in connection with damages case (1.1); review and evaluate research issues in connection with Whinstone appeal and damages case (1.7); prepare for mediation follow-up and confer with client team regarding same (2.2).	6.50	1025.00	6,662.50
2/24/25	SR	Attend teleconference with EB, BA, JS, PB, HM, A. Schwartz to discuss high priority action items relating to damages complaint (1.1); review materials and take notes in connection with the same to assist EB analysis (7.9).	9.00	750.00	6,750.00
2/24/25	TB	Review procedures and engage in legal research regarding bankruptcy appeals both to the district court and on direct certified appeal to the Fifth Circuit and plan regarding appeal of prior decisions.	5.20	1200.00	6,240.00
2/24/25	CS	Continue researching statute of limitations for fraudulent inducement claim and drafting legal memorandum regarding the same (4.1).	4.10	850.00	3,485.00
2/24/25	JH	Update bankruptcy docket.	1.00	350.00	350.00
2/24/25	PB	Prepare documents for disclosure in response to Rule 2004 request (1.0); call with discovery vendor regarding same (0.1); attend strategy teleconference with EB, BA, JS, HM, and A. Swartz regarding discovery action items (1.1).	2.20	850.00	1,870.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/24/25	ASA	Update detailed tracking memorandum to reflect case developments and precise substance of the agreed order on the motion to assume (0.3); attention to ensuring proper docket notices for attorneys in adversarial damages case at request of EB (1.4).	1.70	350.00	595.00
2/24/25	HM	Confer with PB, EB, JS, BA, SR, and A. Swartz regarding appeal of motion to assume and high priority discovery items for adversary case (1.1); coordinate with ASA and PH regarding case management and notices of filing (2.2); draft notices of appearance for adversary case (0.7).	4.00	700.00	2,800.00
2/25/25	VO	Confer with JS regarding mediation issues and strategy.	.50	1025.00	512.50
2/25/25	PS	Review JS assessment in support of settlement and briefly evaluate relevant underlying documents.	.60	1450.00	870.00
2/25/25	EB	Review initial research results from TB and CS (0.3); attend teleconference with BA regarding high priority action items including follow-up research requests (0.3); advise TB and CS regarding same (0.3); attention to discovery-related action items including document assessment and collection (1.5); advise HM regarding revisions to notice of appearance (0.1); attend checkpoint teleconference with BA, clients, and co-counsel (0.5); correspond with TT regarding instructions for upcoming [redacted] and revisions to prior summary (0.2); review and respond to correspondence from BA and JS regarding additional high priority analysis and action items including correspondence to opposing counsel (0.2).	3.40	1250.00	4,250.00
2/25/25	BA	Attend teleconference with EB regarding high priority action items including follow-up research requests (0.3); participate in teleconference with litigation counsel, bankruptcy counsel, and client regarding case status and strategy (0.5); review update from JS on meeting with mediator, confer with W. Thompson regarding supersedeas deposit in Milam County, research and draft proposed email to Whinstone's counsel regarding same, and convey to litigation team and bankruptcy counsel for review (0.4).	1.20	1200.00	1,440.00
2/25/25	JS	Review and evaluate SAFE note and next steps in connection with mediation (5.9); attend call with mediator and client team (1.3).	7.20	1025.00	7,380.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/25/25	SR	Continue reviewing materials and taking notes in support of [redacted] claims, damages, and expert analysis.	1.30	750.00	975.00
2/25/25	TB	Research and planning regarding appeal schedule and legal research regarding path going forward for appeal.	3.60	1200.00	4,320.00
2/25/25	CS	Continue researching statute of limitations issues on fraudulent inducement claim and drafting memorandum regarding the same (3.8).	3.80	850.00	3,230.00
2/25/25	HM	Review and respond to team correspondence regarding documents for use in adversary proceeding (2.5); finalize and file notices of appearance for BA and JS in adversary proceeding (0.5).	3.00	700.00	2,100.00
2/25/25	TT	Review and analyze damages complaint to assist EB with analysis of additional supporting material.	1.00	525.00	525.00
2/26/25	PS	Confer with JS regarding strategic planning.	.90	1450.00	1,305.00
2/26/25	EB	Review updated statute of limitations research from CS (0.1); correspond with BA, JS, and CS regarding revisions to same (0.1); review correspondence and initial research results from TB regarding appeal and correspond regarding same (0.1); work on discovery-related action items including coordinating and instructing Stris team regarding further [redacted] review (2.0); begin reviewing revised summary from TT (0.1).	2.40	1250.00	3,000.00
2/26/25	BA	Review and analyze drafts of memorandum regarding fraudulent inducement claim prepared by CS and correspond with CS, JS, and EB regarding edits to same (0.6); review AEO documents for which designation is being challenged by SAFEs and correspond with bankruptcy counsel regarding same and scheduling of meeting with SAFEs to discuss (0.4); review document preservation letter sent by Whinstone to Rhodium investors, research same, and correspond with EB regarding follow up research on nonparties' preservation obligations (0.3).	1.30	1200.00	1,560.00
2/26/25	JS	Strategic planning for damages case.	3.00	1025.00	3,075.00
2/26/25	SR	Continue reviewing materials and conducting factual research in connection with damages complaint and draft memorandum summarizing preliminary findings (7.8); correspond with EB regarding the same (0.2).	8.00	750.00	6,000.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/26/25	TB	Legal research regarding grounds for dismissal of bankruptcy appeals.	4.00	1200.00	4,800.00
2/26/25	CS	Continue reviewing and analyzing case law regarding statute of limitations for fraudulent inducement claim and continue revising memorandum regarding the same (1.9).	1.90	850.00	1,615.00
2/26/25	CHH	Assist CS with targeted searches regarding Winter Storm Uri release.	.30	350.00	105.00
2/26/25	JH	Distribute documents previously designated Highly Confidential and challenged by SAFE entities to BA, HM and PB at BA request (0.5); update bankruptcy docket (0.4); update adversary case docket (0.2).	1.10	350.00	385.00
2/26/25	PB	Prepare for teleconference with SAFEs regarding discovery matters.	.30	850.00	255.00
2/26/25	ASA	Analyze materials and revise memorandum with instructions for additional damages-related and potential privilege review as instructed by EB and HM (5.0); attend to further updates to internal detailed tracking memorandum (0.4).	5.40	350.00	1,890.00
2/26/25	HM	Review and respond to team correspondence regarding preparation for the adversary case (0.5); perform legal research for EB, BA, and JS (1.0); review and analyze discovery requests and productions for correspondence regarding Winter Storm Uri in phase 1 for EB (2.2).	3.70	700.00	2,590.00
2/26/25	TT	Analyze and summarize additional [redacted] testimony regarding [redacted].	5.50	525.00	2,887.50
2/27/25	PS	Attend teleconference with EB, BA, JS, PB, CS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal.	.80	1450.00	1,160.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/27/25	EB	Correspond with BA, TB, and JS regarding further appeal research (0.1); confer with W. Thompson regarding status and high priority action items and correspond with W. Thompson and A. Swartz regarding pro hac applications (0.2); review drafts and correspond with PS, JS and SR regarding revisions to same (0.1); review order assigning district judge Hanks and correspond with ASA and JHA regarding resulting action items (0.1); review procedure and materials from JHA regarding assigned judge and correspond with A. Swartz and SR regarding revisions resulting from same (0.6); analyze revised statute of limitations memorandum and correspond with BA, JS, and CS regarding next steps (0.2); correspond with co-counsel regarding same (0.1); work on discovery-related action items and strategy (1.1); update [redacted] regarding status (0.1); attention to case management including correspond with HM regarding calendaring of additional deadlines (0.1); prepare for (0.4) and lead (1.0) Stris team teleconference to discuss high priority action items; correspond with HM, TT, and CHH to coordinate further [redacted] review (0.2); review memorandum from SR regarding Uri representations, analyze related documents, and correspond with CS and SR regarding revisions to same (1.2); analyze potential next steps in light of correspondence from HM regarding third party preservation obligations and correspond with BA, JS, and HM regarding same (0.2).	5.70	1250.00	7,125.00
2/27/25	BA	Attend first half of teleconference with EB, JS, PB, PS, CS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (0.5); confer with EB regarding appeal and adversary proceeding action items (0.2).	.70	1200.00	840.00
2/27/25	JS	Continue evaluating SAFE issues in connection with mediation (1.3); continue strategic planning for damages case (1.0); confer with [redacted] regarding issues related to mediation (0.5); attend portion of teleconference with EB, BA, PB, PS, CS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (0.5); attend teleconference with SAFE group and QE regarding professional eyes only designation issue (0.2).	3.50	1025.00	3,587.50

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Date	Tkpr	Description	Hours	Rate	Amount
2/27/25	SR	Attend teleconference with EB, BA, JS, PB, PS, CS, TB, MV, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (1); review team pro hac vice applications and conduct legal research in connection with the same (0.4); continue conducting factual research in connection with damages complaint (1.5).	2.90	750.00	2,175.00
2/27/25	TB	Legal research and planning regarding stay of bankruptcy proceedings in light of appeal (4.4); attend part of planning teleconference with Stris attorneys PS, EB, BA, JS, CS, PB, SR, MV, CHH, ASA, and JSA (0.5).	4.90	1200.00	5,880.00
2/27/25	CS	Attend teleconference with EB, BA, JS, PB, PS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (1.0); review and revise memorandum regarding factual background of [redacted] (2.4).	3.40	850.00	2,890.00
2/27/25	CHH	Attend teleconference with EB, BA, JS, PB, PS, CS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (1.0); assist JS and PS with SAFE document searches (0.2); coordinate with vendor, EB, QH, and TT regarding [redacted] and review (0.5); assist SR with preparation of pro hac vice applications for appeal (0.2).	1.90	350.00	665.00
2/27/25	JH	Attend teleconference with EB, BA, JS, PB, PS, CS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (1.0); prepare notes for same (0.6); research background information on [redacted] for Whinstone appeal to S.D. Tex. (1.0).	2.60	350.00	910.00
2/27/25	PB	Attend portion of teleconference with EB, BA, JS, PS, CS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (0.5); teleconference with JS regarding meet and confer (0.1); attend meet and confer with counsel for SAFEs regarding confidentiality issues (0.3).	.90	850.00	765.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/27/25	ASA	Attend teleconference with EB, BA, JS, PB, PS, CS, TB, MV, SR, CHH, and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (1.0); update internal memorandum to reflect recent developments (0.2).	1.20	350.00	420.00
2/27/25	HM	Conduct research for EB and BA relating to non-party preservation obligations in support of response to correspondence asserting same.	1.50	700.00	1,050.00
2/27/25	TT	Analyze and summarize [redacted] of [redacted] in support of damages claim.	4.20	525.00	2,205.00
2/27/25	MV	Attend teleconference with EB, BA, JS, PB, PS, CS, TB, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal.	1.00	425.00	425.00
2/28/25	EB	Review and analyze stay research from TB (0.3); correspond with BA, TB, JS, and litigation fellows regarding follow-up questions and requests (0.1); advise NC regarding assistance with privilege log review and related research and analysis (0.2); begin analyzing same (2.8); review and respond to team correspondence regarding status and high priority action items (0.5); attention to case management (0.2); attend teleconference with TT regarding initial questions and guidance regarding further [redacted] review (0.2); attention to mediation update and resulting action items (0.1); analyze materials and work on discovery strategy (1.0).	5.40	1250.00	6,750.00
2/28/25	BA	Review pro hac motion and judge's procedures.	.30	1200.00	360.00
2/28/25	JS	Work on high priority action items in connection with damages case.	2.00	1025.00	2,050.00
2/28/25	SR	Attend to pro hac vice applications for PKS, JS, BA, and CS and correspond with team regarding the same (1.1); continue conducting factual research in connection with damages complaint (2).	3.10	750.00	2,325.00
2/28/25	TB	Analyze potential arguments, conduct research, and summarize legal issues involved in potential stay of bankruptcy proceedings.	3.50	1200.00	4,200.00

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/28/25	CS	Review and approve pro hac vice application for appeal of Phase 1 ruling to district court.	.10	850.00	85.00
2/28/25	CHH	Assist SR with preparation of pro hac vice applications for appeal (0.4); emails with EB, QH, and TT regarding [redacted] collection from vendor (0.2); summarize TB research regarding bankruptcy stay (0.3);	.90	350.00	315.00
2/28/25	NC	Work on preparation of privilege log as advised by EB.	5.20	350.00	1,820.00
2/28/25	JH	Check for updates in ongoing matter [redacted] at SR request.	.80	350.00	280.00
2/28/25	ASA	Review [redacted] memorandum and begin preparation of timeline of relevant events at request of EB.	1.10	350.00	385.00
2/28/25	HM	Review and revise adversary case review memorandum (0.8); continue performing research for EB (1.8).	2.60	700.00	1,820.00
2/28/25	TT	Analyze and summarize additional Rhodium communications in support of damages claim.	8.10	525.00	4,252.50
		TOTAL PROFESSIONAL SERVICES			**$ 736,447.50**

Invoice # 14486 March 28, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	11.50	1,450.00	16,675.00
Elizabeth Brannen	EB	Partner	85.00	1,250.00	106,250.00
Bridget Asay	BA	Partner	52.40	1,200.00	62,880.00
Tillman Breckenridge	TB	Partner	47.00	1,200.00	56,400.00
Victor O'Connell	VO	Partner	19.90	1,025.00	20,397.50
John Stokes	JS	Partner	87.10	1,025.00	89,277.50
Colleen Smith	CS	Associate	83.40	850.00	70,890.00
Peter Brody	PB	Associate	53.30	850.00	45,305.00
Sarah Rahimi	SR	Associate	63.70	750.00	47,775.00
Helen Marsh	HM	Associate	84.60	700.00	59,220.00
Tanya Tice	TT	Discovery Associate	142.40	525.00	74,760.00
Monica Viramontes	MV	Sr Paralegal	40.50	425.00	17,212.50
Andrew Atsalis	ASA	Fellow	71.20	350.00	24,920.00
Cynthia Huang	CHH	Fellow	49.50	350.00	17,325.00
Sebastian Delgado	SD	Fellow	2.20	350.00	770.00
Nicholas Capalbo	NC	Fellow	32.30	350.00	11,305.00
Jaida Hodge-Adams	JH	Fellow	43.10	350.00	15,085.00
Total			**969.10**		**$ 736,447.50**

Invoice # 14486 March 28, 2025

EXPENSES ADVANCED

Date	Task	Description	Amount
2/01/25		Logikcull Discovery Solutions (February 2025).	2,646.00
2/04/25		Peregrine Consultants - January 2025.	8,400.00
2/14/25		Bankruptcy court filing fee.	100.00
2/15/25		AA airfare for Dallas mediation.	521.78
2/18/25		AA lodging in Dallas for mediation.	657.96
2/25/25		Setec Investigations invoice.	3,374.68
2/26/25		AA transportation to airport.	79.20
2/28/25		Logikcull Discovery Solutions (March 2025).	2,646.00
		TOTAL EXPENSES ADVANCED	**$ 18,425.62**
		TOTAL THIS INVOICE	**$ 754,873.12**

Invoice # 14486 March 28, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14366	1/13/25	132,202.25	111,327.25	20,875.00
14459	2/21/25	840,030.97	.00	840,030.97

Previous Balance	$ 860,905.97
Balance Due This Invoice	$ 754,873.12
TOTAL BALANCE DUE	**$ 1,615,779.09**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 840,030.97	$ 20,875.00	$ .00	$ .00	$ 860,905.97

Stris

March 28, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14500
Client # 00346
Matter # 008

INVOICE SUMMARY

For professional services rendered through February 28, 2025

RE: Non-working Travel for Whinstone Dispute

Total Professional Services	$ 26,757.50
50% discount	$ -13,378.75
Net Professional Services	$ 13,378.75
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 13,378.75**

Electronic Invoice

Invoice # 14500 March 28, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
2/18/25	VO	Travel to mediation.	4.50	1025.00	4,612.50
2/18/25	BA	Travel from Montpelier VT to Dallas TX, not otherwise billed.	4.60	1200.00	5,520.00
2/18/25	ASA	Travel from Barnstable, MA to Dallas, TX to support mediation efforts.	7.00	350.00	2,450.00
2/19/25	VO	Return travel from mediation.	3.00	1025.00	3,075.00
2/20/25	BA	Travel back to Montpelier, VT from Dallas TX following mediation.	7.50	1200.00	9,000.00
2/20/25	ASA	Return travel from Dallas, TX to Barnstable, MA after supporting mediation efforts.	6.00	350.00	2,100.00

TOTAL PROFESSIONAL SERVICES	**$ 26,757.50**
50% discount	$ -13,378.75
NET PROFESSIONAL SERVICES	**$ 13,378.75**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Bridget Asay	BA	Partner	12.10	1,200.00	14,520.00
Victor O'Connell	VO	Partner	7.50	1,025.00	7,687.50
Andrew Atsalis	ASA	Fellow	13.00	350.00	4,550.00
Total			**32.60**		**$ 26,757.50**

TOTAL THIS INVOICE **$ 13,378.75**

Stris

March 28, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14499
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through February 28, 2025

RE: Retention and Fee Applications

Total Professional Services	$ 16,177.50
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 16,177.50**
Previous Balance	$ 9,832.00
TOTAL BALANCE DUE	**$ 26,009.50**

Electronic Invoice

Invoice # 14499 March 28, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
2/10/25	CHH	Begin working on first interim fee application.	1.00	350.00	350.00
2/11/25	VO	Emails and confer with CH regarding quarterly fee application (0.4); emails with B. Howell regarding same (0.1)	.50	1025.00	512.50
2/11/25	CHH	Draft first interim fee application.	5.50	350.00	1,925.00
2/12/25	CHH	Draft first interim fee application.	3.00	350.00	1,050.00
2/13/25	VO	Review, revise, and further prepare interim fee application.	5.30	1025.00	5,432.50
2/13/25	CHH	Assist VO with exhibits for first interim fee application.	.20	350.00	70.00
2/20/25	EB	Prepare portions of monthly fee statement.	.50	1250.00	625.00
2/21/25	EB	Prepare portions of monthly fee statement.	3.40	1250.00	4,250.00
2/21/25	NC	Assist EB with portions of fee statements.	1.80	350.00	630.00
2/24/25	VO	Work on January fee application.	1.30	1025.00	1,332.50

TOTAL PROFESSIONAL SERVICES **$ 16,177.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	3.90	1,250.00	4,875.00
Victor O'Connell	VO	Partner	7.10	1,025.00	7,277.50
Cynthia Huang	CHH	Fellow	9.70	350.00	3,395.00
Nicholas Capalbo	NC	Fellow	1.80	350.00	630.00
Total			**22.50**		**$ 16,177.50**

TOTAL THIS INVOICE **$ 16,177.50**

Stris & Maher LLP

Invoice # 14499 March 28, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14381	1/13/25	6,285.00	5,028.00	1,257.00
14472	2/21/25	8,575.00	.00	8,575.00

Previous Balance	$ 9,832.00
Balance Due This Invoice	$ 16,177.50
TOTAL BALANCE DUE	**$ 26,009.50**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 8,575.00	$ 1,257.00	$ .00	$ .00	$ 9,832.00

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 SEVENTH MONTHLY FEE STATEMENT
FOR THE PERIOD MARCH 1, 2025, THROUGH MARCH 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 March 1, 2025, through March 31, 2025 (the "Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $416,800.00 (80% of the services rendered), plus $21,970.41 (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.

[1] 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 (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 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;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (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 (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 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 (ha.nguyen@usdoj.gov), 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 29th day of April, 2025.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
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Cameron Kelly (SBN 24120936)
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-and-

STRIS & MAHER LLP

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John Stokes (pro hac vice)
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-and-

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408 W. 11th Street, 5th Floor
Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on April 29, 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

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	15.4	$16,695.00	$13,356.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	580.4	$493,202.50	$394,562.00
007	Retention and Fee Applications	9.8	$11,102.50	$8,882.00
Total		605.6	$521,000.00	$416,800.00

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	9.70	12,125.00
Bridget Asay	Partner	1997	1,200.00	.50	600.00
Ken Halpern	Partner	1997	1,100.00	1.70	1,870.00
Helen Marsh	Associate	2024	700.00	2.50	1,750.00
Andrew Atsalis	Litigation Fellow	N/A	350.00	1.00	350.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Peter Stris	Founding Partner	2001	1,450.00	23.80	34,510.00
Elizabeth Brannen	Managing Partner	2001	1,250.00	61.50	76,875.00
Bridget Asay	Partner	1997	1,200.00	27.60	33,120.00
Tillman Breckenridge	Partner	2003	1,200.00	47.90	57,480.00
Matthew Seligman	Partner	2013	1,100.00	23.80	26,180.00
Victor O'Connell	Partner	2012	1,025.00	18.90	19,372.50
John Stokes	Partner	2016	1,025.00	73.90	75,747.50
Colleen Smith	Associate	2015	850.00	44.80	38,080.00
Peter Brody	Associate	2016	850.00	4.00	3,400.00
Sarah Rahimi	Associate	2019	750.00	8.70	6,525.00
Helen Marsh	Associate	2024	700.00	21.90	15,330.00
Lisa Sherrod	Lead Discovery Assoc	2001	625.00	15.30	9,562.50
Tanya Tice	Discovery Associate	1989	525.00	132.70	69,667.50
Monica Viramontes	Senior Paralegal	N/A	425.00	11.90	5,057.50
Andrew Atsalis	Litigation Fellow	N/A	350.00	26.30	9,205.00
Cynthia Huang	Litigation Fellow	N/A	350.00	7.70	2,695.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	3.10	1,085.00
Jaida Hodge-Adams	Litigation Fellow	N/A	350.00	26.60	9,310.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	8.30	10,375.00
Victor O'Connell	Partner	2012	1,025.00	.30	307.50
Nicholas Capalbo	Litigation Fellow	N/A	350.00	1.20	420.00

EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
E-discovery platform fees	$3,765.00
Expert fees	$7,950.00
Total	$11,715.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
E-discovery platform fees	$2,646.00
Litigation support	$2,776.30
Travel	$4,433.11
Court fees	$400.00
Total	$10,255.41

EXHIBIT 4

Stris

April 23, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14530
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through March 31, 2025

RE: Midas Green Litigation

Total Professional Services	$ 16,695.00
Total Expenses Advanced	$ 11,715.00
TOTAL THIS INVOICE	**$ 28,410.00**
Previous Balance	$ 21,361.00
TOTAL BALANCE DUE	**$ 49,771.00**

Electronic Invoice

Invoice # 14530 April 23, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
3/03/25	EB	Review docket and confer with Texas counsel regarding status and anticipated timing (0.4); update [redacted] regarding same and GRC request (0.1).	.50	1250.00	625.00
3/04/25	EB	Review correspondence from counsel for GRC and correspond with [redacted] regarding response to same.	.10	1250.00	125.00
3/05/25	EB	Correspond with (0.1) and attend teleconference with counsel for GRC regarding confidentiality inquiry (0.1).	.20	1250.00	250.00
3/06/25	EB	Correspond with R. Harrington regarding revised objections to Midas proofs of claim (0.2); advise HM regarding research in support of additional grounds for same (0.3); analyze results and perform further research in support of same (1.9); propose revisions to same (0.7).	3.10	1250.00	3,875.00
3/06/25	ASA	Review and compile internal documents regarding technical expert to provide information requested by KH and EB in support of oppositoin to Midas patent claim.	.50	350.00	175.00
3/06/25	HM	Conduct research for EB regarding Kessler doctrine and law of the case.	2.50	700.00	1,750.00
3/07/25	EB	Analyze further revised objections to Midas proof of claim and correspond with R. Harrington regarding same.	.40	1250.00	500.00
3/10/25	EB	Correspond with JHA and ASA regarding objections to Midas claims.	.10	1250.00	125.00
3/13/25	EB	Review and respond to correspondence from KH regarding inquiry from opposing counsel (0.1); review correspondence from opposing counsel regarding notice to Rhodium (0.1); begin analyzing issues resulting from same (0.4).	.60	1250.00	750.00
3/13/25	KJH	Attend teleconference with Midas counsel H. Pogorzelski regarding GRC subpoena to Midas for Rhodium documents (0.2); correspond with EB regarding same and resulting action items (0.3).	.50	1100.00	550.00

Invoice # 14530 April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/14/25	EB	Review and analyze issues relating to further correspondence from counsel for Midas Green relating to Immersion Systems (0.5); discuss same with BA (0.5); advise PB and ASA regarding research in support of Immersion Systems analysis (0.1); review results of same (0.1); correspond with [redacted] and [redacted] regarding update from Midas-GRC discovery hearing and response to outstanding inquiries (0.2).	1.40	1250.00	1,750.00
3/14/25	BA	Confer with EB regarding requests for production to Midas Greene of Rhodium/Immersion documents in a separate lawsuit.	.50	1200.00	600.00
3/17/25	EB	Prepare initial responses to correspondence from opposing counsel and correspond with [redacted] and [redacted] regarding same (0.2); review further correspondence from opposing counsel and additional third party recipient (Ameritex) and respond to counsel for Ameritex (0.2); analyze discovery hearing transcript (0.4); correspond with KH regarding same (0.1); send initial responses to opposing counsel (0.1).	1.00	1250.00	1,250.00
3/17/25	KJH	Confer with EB regarding GRC subpoena to Midas (0.1); correspond with EB regarding status and action items in support of proposed written dispositive motions order from Judge Albright (0.2).	.30	1100.00	330.00
3/18/25	EB	Review correspondence from KH regarding status and potential steps in support of request for written ruling (0.1); prepare for (0.1); and attend (0.3) teleconference with counsel for Ameritex; correspond with KH regarding resulting action items (0.1).	.60	1250.00	750.00
3/18/25	KJH	Analyze, confer with PB regarding, and update EB regarding Ameritex information in support of response to Ameritex counsel and to Midas regarding Rhodium's position on subpoena seeking Ameritex documents from Midas-Rhodium litigation.	.80	1100.00	880.00

Invoice # 14530 April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/19/25	EB	Respond to correspondence from counsel for Ameritex with interim update and review interim update from opposing counsel (0.1); correspond with [redacted] regarding open questions and action items including potential motion practice and deadline (0.2); correspond with opposing counsel and ASA regarding status and subpoena scope (0.2); confer with KH regarding action items including record assessment in support of response to Ameritex (0.1).	.60	1250.00	750.00
3/19/25	KJH	Teleconference with EB regarding record assessment in support of response to GRC subpoena to Midas seeking Rhodium and Ameritex documents.	.10	1100.00	110.00
3/19/25	ASA	Detailed tracking of Rhodium, Ameritex, and Midas positions based upon correspondence regarding third- party subpoena and potential production of Rhodium and Ameritex documents as outside counsel eyes only.	.50	350.00	175.00
3/20/25	EB	Review correspondence from counsel for Midas and proposed orders submitted by GRC and Midas (0.2); correspond with clients (0.1) and counsel for Ameritex (0.1) regarding same.	.40	1250.00	500.00
3/21/25	EB	Review and analyze order and update [redacted] and [redacted] regarding same (0.2); confer with counsel for Ameritex regarding Rhodium position with respect to confidentiality and subpoena scope and advise ASA regarding updates to [redacted] memorandum (0.2).	.40	1250.00	500.00
3/23/25	EB	Correspond with opposing counsel and counsel for Ameritex regarding Rhodium position (0.1); correspond with opposing counsel to request notice to Immersion Systems in the event of future broader scope subpoena (0.1).	.20	1250.00	250.00
3/26/25	EB	Update [redacted] and [redacted] regarding status of case and interim update from discussions with [redacted] and opposing counsel.	.10	1250.00	125.00
		TOTAL PROFESSIONAL SERVICES			**$ 16,695.00**

Stris & Maher LLP

Invoice # 14530 April 23, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	9.70	1,250.00	12,125.00
Bridget Asay	BA	Partner	.50	1,200.00	600.00
Ken Halpern	KJH	Partner	1.70	1,100.00	1,870.00
Helen Marsh	HM	Associate	2.50	700.00	1,750.00
Andrew Atsalis	ASA	Fellow	1.00	350.00	350.00
Total			**15.40**		**$ 16,695.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
2/28/25		JND Discovery Invoice for February 2025.	3,765.00
3/04/25		Peregrine Consultants - February 2025.	7,950.00
		TOTAL EXPENSES ADVANCED	**$ 11,715.00**
		TOTAL THIS INVOICE	**$ 28,410.00**

Stris & Maher LLP

Invoice # 14530 April 23, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14380	1/13/25	8,990.00	7,192.00	1,798.00
14471	2/21/25	25,380.00	21,057.00	4,323.00
14498	3/28/25	15,240.00	.00	15,240.00

Previous Balance	$ 21,361.00
Balance Due This Invoice	$ 28,410.00
TOTAL BALANCE DUE	**$ 49,771.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 15,240.00	$ .00	$ 4,323.00	$ 1,798.00	$ .00	$ 21,361.00

Stris

April 23, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14517
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through March 31, 2025

RE: Whinstone Litigation

Total Professional Services	$ 493,202.50
Total Expenses Advanced	$ 10,255.41
TOTAL THIS INVOICE	**$ 503,457.91**
Previous Balance	$ 902,700.62
TOTAL BALANCE DUE	**$ 1,406,158.53**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Invoice # 14517 April 23, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
3/01/25	JS	Review and evaluate issues arising from mediation.	1.00	1025.00	1,025.00
3/02/25	JS	Evaluate strategy for Whinstone litigation in connection with potential plan confirmation issues.	1.70	1025.00	1,742.50
3/02/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	2.60	525.00	1,365.00
3/03/25	VO	Confer with JS regarding strategy for damages case.	.80	1025.00	820.00
3/03/25	EB	Update TB regarding case status and upcoming action items including record designations (0.1); advise NC, further revise, and correspond with BA, JS, and PB regarding revisions to initial analysis of Whinstone privilege log to support further review and assessment of issues and deficiencies relating to same (0.9); correspond with SR, CHH, and A. Swartz regarding pro hac applications (0.1); work on discovery strategy and staffing for damages case and assess highest priority action items (2.0); review and analyze update from HM regarding Whinstone's [redacted] discovery representations and correspond with SR, ASA, and NC regarding revisions to related memorandum and timeline (0.4); analyze and correspond with TT regarding updates from further review (0.2).	3.70	1250.00	4,625.00
3/03/25	BA	Correspond and confer with CS regarding analysis of issues with respect to adversary proceeding (0.3); correspond with EB, PB, and JS regarding analysis of Whinstone's privilege log as relevant to claims in adversary proceeding (0.1).	.40	1200.00	480.00
3/03/25	JS	Confer with VO regarding strategy for damages case (0.8); evaluate next steps in light of mediation outcome (0.5).	1.30	1025.00	1,332.50
3/03/25	SR	Attend to pro hac vice applications for PKS, JS, BA, and CS and correspond with team regarding the same (1.0); review CS edits to memorandum relating to damages complaint and further revise same to incorporate additional facts and research (2.2).	3.20	750.00	2,400.00
3/03/25	TB	Telephone call with EB to discuss status and upcoming action items.	.10	1200.00	120.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/03/25	CS	Correspond and confer with BA to discuss research on various questions related to adversary proceeding (0.3); begin reviewing and analyzing case law and drafting memorandum regarding the same (3.7).	4.00	850.00	3,400.00
3/03/25	CHH	Finalize pro hac vice applications for bankruptcy appeal and confer with SR and PH regarding same (0.5); telephone call with SDTX clerk regarding same (0.2).	.70	350.00	245.00
3/03/25	NC	Update privilege log analysis as directed by EB and circulate to attorney team.	1.30	350.00	455.00
3/03/25	ASA	Continue preparing timeline of key representations related to [redacted].	2.40	350.00	840.00
3/03/25	HM	Review, analyze, and summarize phase 1 discovery correspondence and documents for EB.	2.00	700.00	1,400.00
3/03/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	8.00	525.00	4,200.00
3/04/25	EB	Advise litigation fellows in support of discovery-related action items (0.2); review and analyze updates from TT and advise regarding further document review and analysis (0.3); attention to preservation notices sent to third-parties (0.2).	.70	1250.00	875.00
3/04/25	BA	Participate in weekly teleconference with client, litigation counsel, and bankruptcy counsel to discuss appeal, adversary proceeding, case strategy, and settlement discussions.	1.00	1200.00	1,200.00
3/04/25	JS	Attend weekly client touchpoint call (1.0); evaluate next steps in light of mediation outcome (0.5).	1.50	1025.00	1,537.50
3/04/25	SR	Review and analyze documents to be added to memorandum summarizing factual research relating to damages complaint and correspond with MV regarding the same.	.60	750.00	450.00
3/04/25	CS	Continue analyzing case law and drafting memorandum in support of adversary proceeding [redacted].	3.60	850.00	3,060.00
3/04/25	CHH	Update draft pro hac vice applications for bankruptcy appeal (0.2); telephone call with SDTX clerk regarding same (0.2); file pro hac vice applications for bankruptcy appeal (0.3).	.70	350.00	245.00
3/04/25	JHA	Check for ongoing updates in litigation pending against [redacted] at SR request.	1.80	350.00	630.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/04/25	ASA	Review client documents to revise [redacted] for reference by document reviewers in support of damages case (0.7); update document review memorandum with information requested by EB (0.8).	1.50	350.00	525.00
3/04/25	HM	Coordinate with ASA, JHA, and CH regarding ongoing task assignments.	.50	700.00	350.00
3/04/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	9.30	525.00	4,882.50
3/04/25	MV	Create saved searches in support of attorney review of additional documents.	1.00	425.00	425.00
3/05/25	EB	Review updated draft and advise NC regarding privilege log analysis (0.2); review team and client correspondence and begin analyzing response to client inquiry (0.7).	.90	1250.00	1,125.00
3/05/25	BA	Correspond with opposing counsel and [redacted] regarding state court bond deposit.	.10	1200.00	120.00
3/05/25	JS	Work on high priority action items for damages case.	2.50	1025.00	2,562.50
3/05/25	NC	Update privilege log analysis.	1.20	350.00	420.00
3/05/25	JHA	Update dockets, including the bankruptcy original and adversary proceedings and the district court appeal.	2.50	350.00	875.00
3/05/25	PB	Coordinate transfer of ESI to co-counsel for response to Rule 2004 requests.	.50	850.00	425.00
3/05/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	8.10	525.00	4,252.50
3/06/25	VO	Attend teleconference with PS, EB, JS, CS, PB, SR, HM, MV, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research.	.80	1025.00	820.00
3/06/25	PS	Prepare for (0.4) and attend (0.8) weekly team zoom.	1.20	1450.00	1,740.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/06/25	EB	Confer with NC regarding status of privilege log analysis (0.1) and BA regarding high priority action items (0.1); attend teleconference with W. Thompson and [redacted] regarding motion to withdraw the reference (0.1); prepare for (0.5) and attend (0.8) Stris team meeting regarding status and high priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research; review related materials and review and respond to team correspondence regarding high priority action items in support of document assessment, claim objections, and analysis in response to client inquiry (0.5).	2.10	1250.00	2,625.00
3/06/25	BA	Review, research, and edit draft omnibus objection to SAFEs' claim, correspond with JS regarding same, and convey comments on same to P. Tomasco (2.4); review draft opposition to motion to withdraw the reference and correspond with P. Tomasco and team regarding same (0.9); review draft memorandum from P. Tomasco regarding [redacted] and research related issues (0.4).	3.70	1200.00	4,440.00
3/06/25	JS	Attend teleconference with PS, EB, VO, CS, PB, SR, HM, MV, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research (0.8); review and evaluate SAFE claim objection (0.9); review and evaluate [redacted] issues (1.0); review and evaluate contract [redacted] issues (1.5); continue to work on high priority action items for damages case (1.0).	5.20	1025.00	5,330.00
3/06/25	SR	Attend teleconference with PS, EB, VO, JS, CS, PB, HM, MV, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research.	.80	750.00	600.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/06/25	CS	Attend teleconference with PS, EB, VO, JS, PB, SR, HM, MV, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research (0.8); review and analyze memorandum regarding [redacted] (1.0); review and analyze power contracts regarding [redacted] or [redacted] economic value (2.4).	4.20	850.00	3,570.00
3/06/25	CHH	Attend teleconference with PS, EB, VO, JS, CS, PB, SR, HM, MV, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research.	.80	350.00	280.00
3/06/25	JHA	Attend teleconference with PS, EB, VO, JS, CS, PB, SR, HM, MV, CHH & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research (0.8); update dockets, including bankruptcy original and adversary proceedings, and district court appeal (0.7).	1.50	350.00	525.00
3/06/25	PB	Attend teleconference with PS, EB, VO, JS, CS, SR, HM, MV, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research (0.8); correspondence with JS regarding [redacted] obligations (0.2).	1.00	850.00	850.00
3/06/25	ASA	Attend teleconference with PS, EB, VO, JS, CS, PB, SR, HM, MV, CHH, and JHA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research (0.8); update document review memorandum to reflect attorney priorities (0.4).	1.20	350.00	420.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/06/25	HM	Attend teleconference with PS, EB, VO, JS, CS, PB, SR, MV, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research (0.8); update damages case document review memorandum (0.5).	1.30	700.00	910.00
3/06/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	8.50	525.00	4,462.50
3/06/25	MV	Attend teleconference with PS, EB, VO, JS, CS, PB, SR, HM, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities and ongoing legal research.	.80	425.00	340.00
3/07/25	EB	Review and respond to updates from TT (0.1); analyze same and correspond with BA and JS regarding potential addition to amended complaint (0.4); correspond with litigation fellows and HM regarding [redacted] action items including [redacted] updates (0.1).	.60	1250.00	750.00
3/07/25	JS	Continue strategic planning for damages case (3.9); confer with [redacted] regarding latest settlement negotiations with Riot (0.2).	4.10	1025.00	4,202.50
3/07/25	ASA	Prepare exports for review in support of damages case (0.6); begin review of additional Rhodium documents to identify information in support of damages case (0.9).	1.50	350.00	525.00
3/07/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	7.10	525.00	3,727.50
3/09/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	2.90	525.00	1,522.50
3/10/25	EB	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	.60	1250.00	750.00
3/10/25	JS	Continue work on analysis of [redacted] energization.	2.00	1025.00	2,050.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/10/25	JHA	Review and update bankruptcy dockets, including district court appeal, bankruptcy appeal and adversary proceeding dockets (1.0); confer with EB regarding status of bankruptcy objections to Midas Green proof of claim in the related matter (0.3).	1.30	350.00	455.00
3/10/25	ASA	Continue analysis of additional Rhodium documents to identify information in support of damages case.	3.70	350.00	1,295.00
3/10/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	9.30	525.00	4,882.50
3/11/25	EB	Review correspondence, begin analyzing issues, and correspond with BA, TB, and JS regarding appellate record designations (0.6); review correspondence and materials from P. Tomasco regarding same (0.1); attention to case management (0.5).	1.20	1250.00	1,500.00
3/11/25	BA	Participate in weekly call with bankruptcy counsel, litigation counsel, and client (0.4); review Whinstone's designation of record for appeal, correspond with EB, TB, and JS regarding issues related to same, correspond with P. Tomasco regarding same, and review related research (0.4); correspond with P. Tomasco and with W. Thompson and A. Swartz regarding preparation of motion to recover bond deposit with state court (0.3).	1.10	1200.00	1,320.00
3/11/25	JS	Continue evaluating [redacted] energization issue (2.0); review and evaluate letter from SAFE group regarding disclosure of Stris and LKC information (1.2) and confer with P. Tomasco regarding same (0.2); continue preparing go-forward strategy and evaluating key issues in connection with damages case (1.7); attend portion of weekly touchpoint call (0.6).	5.70	1025.00	5,842.50
3/11/25	TB	Plan regarding document designation response; review document designations; review opinion on appropriate designations.	.70	1200.00	840.00
3/11/25	CS	Continue analyzing case law and drafting memorandum regarding adversary proceeding.	1.90	850.00	1,615.00
3/11/25	ASA	Continue analysis of additional Rhodium documents to identify information in support of damages case.	2.20	350.00	770.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/11/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	8.20	525.00	4,305.00
3/12/25	VO	Confer with JS regarding assignments and strategy (1.0); review and respond to email from P. Tomasco regarding draft letter (0.6); confer with PS regarding same (0.3).	1.90	1025.00	1,947.50
3/12/25	EB	Correspond with TT regarding review status and action items (0.1); confer with HM regarding high priority discovery-related action items (0.1); analyze materials and advise HM and litigation fellows regarding revisions to review memorandum (0.5); review team correspondence and correspondence with co-counsel regarding objections to SAFE discovery requests and analyze draft of same (0.2); attention to case management (0.3).	1.20	1250.00	1,500.00
3/12/25	BA	Begin outlining and analyzing issues for motion to release supersedeas deposit in state court (1.5); review and analyze issues relating to energizing [redacted] and correspond with JS regarding same (0.5); review proposed response and correspondence regarding SAFE discovery requests and correspond with JS regarding status of certain discovery matters (0.4).	2.40	1200.00	2,880.00
3/12/25	JS	Evaluate response letter regarding SAFE document requests (0.5) and confer with B. Roth regarding same (0.1); evaluate issues regarding appellate record designation (0.4); further revise [redacted] energization analysis (0.7); evaluate discovery issues that remain to be addressed in damages case (1.5).	3.20	1025.00	3,280.00
3/12/25	TB	Review record designations and docket to assess potential further designations.	1.90	1200.00	2,280.00
3/12/25	CS	Continue analyzing case law and drafting memorandum regarding adversary proceeding.	4.50	850.00	3,825.00
3/12/25	HM	Confer with EB about high priority discovery items (0.1); coordinate with PH to ensure compliance with case deadlines (0.1).	.20	700.00	140.00
3/12/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	9.50	525.00	4,987.50

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Date	Tkpr	Description	Hours	Rate	Amount
3/13/25	VO	Prepare for (0.3) and attend call with P. Tomasco, JS, W. Thomson, and others regarding response to letter (0.7); emails with P. Tomasco and legal team regarding same (0.3).	1.30	1025.00	1,332.50
3/13/25	PS	Prepare for (0.5) and attend (0.9) weekly team zoom.	1.40	1450.00	2,030.00
3/13/25	EB	Prepare for (0.5) and lead (0.9) Stris team meeting; attend teleconference with TT, HM, ASA and JHA regarding status and action items in support of further review (0.5); attend teleconference with MV regarding high priority action items including fellow management (0.2); work on offensive discovery strategy (1.4); review and respond to team correspondence and correspond with Stris team regarding action items including document and privilege log review and analysis (0.2).	3.70	1250.00	4,625.00
3/13/25	BA	Attend portion of teleconference with MV, EB, PS, JS, TB, CS, PB, HM, SR, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal (0.6); continue reviewing Whinstone's record designations for appeal, research issues relating to record designations and motion to strike improper designations, and correspond with P. Tomasco regarding same (0.5); confer with CH regarding Whinstone's record designations (0.1); review correspondence from R. Mates regarding discovery matters and correspond with JS and PB regarding same (0.1); continue analyzing appeal issues raised by Whinstone and correspond with TB, EB, and JS regarding potential waiver of appellate issues (0.5); review potential exhibits for supersedeas bond filing and correspond with JH and HM regarding preparation of exhibits and declaration for supersedeas bond filing (0.3).	2.10	1200.00	2,520.00
3/13/25	JS	Attend teleconference with MV, EB, PS, TB, CS, PB, HM, SR, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal (0.9); push forward key action items related to damages issues on Building D and Winter Storm Uri (1.9).	2.80	1025.00	2,870.00
3/13/25	SR	Attend teleconference with MV, EB, PS, JS, TB, CS, PB, HM, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal.	.90	750.00	675.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/13/25	TB	Review Second Interim Order and plan regarding record needs and counter designations and work on same (4.2); attend part of Stris team call regarding appellate action items including waiver research (0.3).	4.50	1200.00	5,400.00
3/13/25	CS	Attend teleconference with MV, EB, PS, JS, TB, PB, HM, SR, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal (0.6); continue reviewing and analyzing case law in preparation for responding answer in adversary proceeding and drafting memorandum regarding the same (3.2).	3.80	850.00	3,230.00
3/13/25	CHH	Attend teleconference with MV, EB, PS, JS, TB, CS, PB, HM, SR, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal.	.60	350.00	210.00
3/13/25	JHA	Attend teleconference with MV, EB, PS, JS, TB, CS, PB, HM, SR, and CHH to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal (0.6); update internal tracking memorandum with exhibits offered and admitted, including for a limited purpose, in support of appellate motion practice as directed by BA (1.0); attend teleconference with TT, ASA, EB, CHH and HM to discuss ongoing review of Rhodium materials (0.5); begin reviewing additional assigned materials in support of damages claims (2.0); prepare exhibits and provide materials for upcoming motion regarding supersedeas deposit at BA request (1.5).	5.60	350.00	1,960.00
3/13/25	PB	Attend teleconference with MV, EB, PS, JS, TB, CS, HM, SR, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal.	.90	850.00	765.00
3/13/25	ASA	Finalize Damages Phase document review memorandum and circulate to EB, HM, CHH, JHA, and TT (0.8); attend teleconference with EB, TT, HM, and JHA to discuss and assign roles for analysis and review in support of same (0.5); correspond with MV about review project (0.2); continue analysis of additional Rhodium documents to identify information in support of damages case (2.9).	4.40	350.00	1,540.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/13/25	HM	Attend teleconference with EB, TT, ASA and JHA regarding status and action items in support of further document review (0.5); prepare for (0.1) and attend (0.9) teleconference with MV, EB, PS, JS, TB, CS, PB, SR, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal.	1.50	700.00	1,050.00
3/13/25	TT	Attend teleconference with EB, HM, ASA and JHA regarding status and action items in support of further Rhoidum document review (0.5); analyze and summarize additional Rhodium materials for EB in support of damages claim (8.0).	8.50	525.00	4,462.50
3/13/25	MV	Attend teleconference with EB, PS, JS, TB, CS, PB, HM, SR, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal (0.9); attend teleconference with EB regarding high priority action items including fellow management (0.2); assess and follow-up with fellows and attorneys regarding ongoing document assignments and action items (0.2).	1.30	425.00	552.50
3/14/25	EB	Prepare for (0.5) and attend portion of teleconference to advise HM and MV regarding damages case document review and case management (0.6); analyze current privilege log materials (0.4); correspond with PB, MV, NC, and ASA regarding family analysis of same (0.2); review correspondence from BA and analyze issues and record relating to appellate waiver arguments (1.0); review and respond to correspondence from BA regarding supplemental record designations (0.1).	2.80	1250.00	3,500.00
3/14/25	BA	Continue researching and reviewing issues for record designation and motion to strike portions of Whinstone's designations, and correspond with CH and JH regarding research and documents for same.	1.90	1200.00	2,280.00
3/14/25	JS	Prepare for (0.5) and attend (0.4) call regarding [redacted] exit financing questions; continue evaluating next steps for damages case and possible Whinstone settlement (0.9).	1.80	1025.00	1,845.00
3/14/25	SR	Review and analyze documents to be added to memorandum summarizing factual research relating to damages complaint.	2.40	750.00	1,800.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/14/25	TB	Review docket and document designations and plan regarding responsive designations (5.0); plan regarding research on waiver issues (0.9).	5.90	1200.00	7,080.00
3/14/25	CS	Continue reviewing and analyzing case law in preparation for composing response to Whinstone and Riot's answer to or motion to dismiss damages action; continue drafting memorandum regarding the same (6.0).	6.00	850.00	5,100.00
3/14/25	CHH	Provide documents to BA in support of additional designations to record on appeal (0.5); review and analyze Whinstone's designations and pull pleadings relating to same (1.0).	1.50	350.00	525.00
3/14/25	NC	Update and circulate updated privilege log analysis for attorney review.	.20	350.00	70.00
3/14/25	JHA	Continue reviewing and analyzing assigned Rhodium documents in support of damages case (2.1); compile exhibits and supporting materials for motion to strike Whinstone designations (1.0).	3.10	350.00	1,085.00
3/14/25	ASA	Analyze past briefing at request of PB and EB to confirm pertinent information about Immersion Systems.	2.10	350.00	735.00
3/14/25	HM	Confer with HM, EB, and MV regarding damages case document review and case management.	1.70	700.00	1,190.00
3/14/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	7.80	525.00	4,095.00
3/14/25	MV	Confer with HM and EB regarding damages case document review and case management (1.7); review damages case review memorandum and related documents (1.0); correspond with team regarding ongoing oversight of fellows regarding document review and assign batches for review (0.3); review and respond to correspondence related to privilege log (0.5); conduct document review in support of damages case and begin summary of findings regarding same (3.5).	7.00	425.00	2,975.00
3/15/25	TB	Research regarding waiver and planning regarding response to waived issues.	2.10	1200.00	2,520.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/15/25	CS	Continue analyzing case law and drafting memorandum in support of adversary proceeding in preparation for responding to answers or motions to dismiss.	2.90	850.00	2,465.00
3/16/25	VO	Review and analyze [redacted], and [redacted] documents and summaries of key information relating to same.	1.60	1025.00	1,640.00
3/16/25	PS	Review documents provided and curated by J. Stokes for purposes of assessing key strategic issues pertaining to damages claim, potential settlement, and proposed plan terms.	4.50	1450.00	6,525.00
3/16/25	EB	Confer with JS regarding high priority action items and assignments including searching in support of objection to SAFE claim, approval for fraudulent inducement amendment, and appellate waiver research (0.5); analyze materials relating to support for fraudulent inducement claim (3.5); correspond with BA, TB, MS, and JS regarding analysis of same (1.6); correspond with CHH regarding systems access and related action items (0.1).	5.70	1250.00	7,125.00
3/16/25	BA	Correspond with EB and MS regarding issues related to fraudulent inducement claim (0.3); continue analyzing issues for and drafting filings for response to Whinstone's designation of record materials (0.5).	.80	1200.00	960.00
3/16/25	JS	Confer with EB regarding high priority action items and assignments including searching in support of objection to SAFE claim, approval for fraudulent inducement amendment, and appellate waiver research (0.5); review complaint and existing research in connection with same (0.4).	.90	1025.00	922.50
3/16/25	TB	Conduct further legal research regarding waiver via agreement and failure to raise.	5.10	1200.00	6,120.00
3/16/25	CS	Continue research in support of response to Whinstone and Riot answers to or motions to dismiss damages action and drafting memorandum regarding same.	3.10	850.00	2,635.00
3/16/25	MS	Analyze documents and materials regarding fraudulent inducement issue.	2.70	1100.00	2,970.00
3/16/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	6.30	525.00	3,307.50

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Date	Tkpr	Description	Hours	Rate	Amount
3/17/25	VO	Review documents provided and curated by JS for purposes of assessing key strategic issues pertaining to damages claim, potential settlement, and proposed plan terms (4.8); confer with JS and EB regarding damages and other high-priority items (0.5).	5.30	1025.00	5,432.50
3/17/25	PS	Review documents provided and curated by JS for purposes of assessing key strategic issues pertaining to damages claim, potential settlement, and proposed plan terms.	4.30	1450.00	6,235.00
3/17/25	EB	Review and respond to team correspondence regarding discovery and document-related action items (0.2); evaluate high priority damages-related tasks (0.5); correspond with ASA regarding prioritization of litigation fellow tasks (0.1); analyze additional materials to prepare for (1.3) and confer with JS and MS regarding fraudulent inducement analysis (0.7); correspond with HM regarding and provide additional information to MS in support of same (0.1); review updates from TT, confer with Stris Team regarding background, and advise TT regarding further Rhodium document review and analysis (0.2); confer with VO and JS regarding Building D analysis and high priority action items (0.5); review update from TB regarding appellate record designations and correspondence from BA regarding next steps (0.1); review and analyze Building D correspondence, materials, and legal research from co-counsel and determine next steps in support of development of proof regarding same (2.0); attend teleconference with HM regarding factual memorandum assessing same (0.2); review and provide supporting materials and further instructions to HM (0.3); begin reviewing Riot and Whinstone filings moving to withdraw the reference and dismiss damages complaint (1.0).	7.20	1250.00	9,000.00
3/17/25	BA	Correspond with CH and with JH regarding status of analysis relevant to record designations for appeal (0.2); begin reviewing transcripts as relevant to both supplemental designations and motion to strike Whinstone's designations (1.5).	1.70	1200.00	2,040.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/17/25	JS	Confer with EB and MS regarding fraudulent inducement analysis (0.7); correspond with EB and MS regarding same (0.2); confer with VO and EB regarding Building D and other high priority issues (0.5); review and evaluate Riot and Whinstone responses to damages complaint (2.5); review documents in connection with SAFE analysis related to Whinstone settlement issues (1.2); review SAFE claim objection (1.0); evaluate high priority next steps in connection with damages complaint (1.4); review and evaluate draft motion to return bond in Milam County (0.8).	8.30	1025.00	8,507.50
3/17/25	TB	Research regarding waiver of arguments by contract and judicial waiver (4.6); review documents and advise regarding document designations for appeal (0.6).	5.20	1200.00	6,240.00
3/17/25	CHH	Continue assisting BA with designations for bankruptcy appeal (0.4); assist JS and LS with targeted searching and analysis for Whinstone settlement (0.4); organize and provide documents to various attorneys per EB request (0.1).	.90	350.00	315.00
3/17/25	MS	Analyze documents and expert reports regarding fraudulent inducement issue (2.3); conduct legal research regarding same (4.9); attend teleconference with EB and JS regarding fraudulent inducement analysis (0.7).	7.90	1100.00	8,690.00
3/17/25	JHA	Review Phase 1 hearing transcripts and update internal tracking memorandum with exhibits offered and admitted in support of appellate motion practice as directed by BA (1.3); continue reviewing assigned materials in support of damages phase (2.5).	3.80	350.00	1,330.00
3/17/25	PB	Analyze Whinstone motions to dismiss and to withdraw reference.	.80	850.00	680.00
3/17/25	ASA	Continue review and analysis of assigned Rhodium documents for information for damages case.	2.60	350.00	910.00
3/17/25	HM	Begin reviewing documents and drafting Building D analysis (1.3); confer with EB about Building D analysis (0.2).	1.50	700.00	1,050.00
3/17/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	10.50	525.00	5,512.50
3/17/25	LS	Perform targeted search, review of search results, and compilation of findings for attorney J. Stokes.	7.70	625.00	4,812.50

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Date	Tkpr	Description	Hours	Rate	Amount
3/18/25	VO	Review settlement term sheet and emails with team regarding same (0.4); review and analyze omnibus claim objection and underlying SAFE documents, including reviewing EB redlines to same (1.4); confer with JS regarding same (0.3); attend videoconference with co-counsel and client representatives (0.8).	2.90	1025.00	2,972.50
3/18/25	PS	Review documents provided and curated by JS for purposes of assessing key strategic issues pertaining to damages claim, potential settlement, and proposed plan terms.	4.20	1450.00	6,090.00
3/18/25	EB	Continue reviewing and analyzing Riot and Whinstone motions and ensure staffing and coverage to respond to same (1.2); advise NC and ASA correspond with BA, JS, NC, and ASA regarding preparation of opposition papers responding to same and potential motion to strike jury demand (0.2); review updates from TT regarding document review and analysis and advise regarding same (0.1); correspond with LS regarding additional targeted searching (0.1); attend teleconference with LS regarding same (0.4); prepare for (0.2) and attend (0.4) teleconference with litigation fellows and TT regarding review and matter status, client instructions, and prioritization of non-extended deadline-related tasks; attend teleconference with BA regarding status and high priority action items (0.2); review term sheet (0.1); propose revisions to term sheet including to address intellectual property issues in consultation with BA and JS (0.5); correspond with BA, JS, and co-counsel and review further correspondence regarding further revisions to same (0.1); review update from LS and correspond with JS, LS, and CHH regarding next steps in support of targeted SAFE searches and review (0.1); review and analyze additional Building D materials and further instruct HM regarding analysis of same (0.2); analyze and propose revisions to SAFE claim objection and correspond with JS regarding same (2.5); attend portion of checkpoint teleconference with BA, JS, client and co-counsel (0.7); advise associates and litigation fellows regarding damages case stand down and status memorialization (0.2); attend teleconference with JS, client and co-counsel to discuss SAFE issues (1.5); consult with JS regarding resulting action items including high priority research and assess staffing for same (0.1).	8.80	1250.00	11,000.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/18/25	BA	Review draft term sheet from P. Tomasco and correspond with JS, EB, and VO regarding potential revisions to same (0.2); confer with EB regarding draft term sheet (0.2); confer with EB and JS regarding potential issues to flag in term sheet (0.5); continue reviewing record materials to prepare supplemental designations of record and motion to strike, correspond with JH regarding exhibit list, correspond with CH and CS regarding potential filings for designation, and convey draft record designations to litigation team for input (4.6); participate in teleconference with client, bankruptcy counsel, and litigation team (0.8).	6.20	1200.00	7,440.00
3/18/25	JS	Evaluate SAFE issues in connection with Whinstone settlement (2.3); attend weekly touchpoint call (0.8); attend call with QE, SMLLP, and Province teams regarding SAFE issues in connection with Whinstone settlement (1.5); further conversation with EB regarding same (0.1).	4.70	1025.00	4,817.50
3/18/25	TB	Continue waiver research.	5.90	1200.00	7,080.00
3/18/25	CHH	Assist BA with additional designations for appeal (0.5); teleconference with EB, HM, JHA, and ASA regarding case updates and high priority action items (0.4); summarize LS research findings regarding SAFEs for EB and JS review (0.3).	1.20	350.00	420.00
3/18/25	NC	Assist ASA with materials in support of responses to Riot and Whinstone motions.	.40	350.00	140.00
3/18/25	MS	Conduct further research and analysis regarding fraudulent inducement.	9.30	1100.00	10,230.00
3/18/25	JHA	Finish reviewing Phase 1 hearing transcripts to update and qc internal tracking memorandum with exhibits offered and admitted in support of appellate motion practice as directed by BA (2.5); attend teleconference with EB, HM, CHH, and ASA regarding case updates and high priority action items (0.4).	2.90	350.00	1,015.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/18/25	ASA	Prepare materials for Rhodium's responses to Riot's Motion to Dismiss and Motion to Withdraw Reference (0.8); prepare materials for Rhodium's responses to Whinstone's Motion to Dismiss and Motion to Withdraw Reference (0.8); correspond with EB regarding Building D materials and information (0.2); teleconference with EB, HM, JHA, and CHH regarding case updates and high priority action items (0.4); record detailed update of document review efforts to facilitate reference by attorneys (0.3).	2.50	350.00	875.00
3/18/25	HM	Continue drafting Building D memorandum (4.1); teleconference with EB, JHA, CH, and ASA regarding case updates and high priority action items (0.4).	4.50	700.00	3,150.00
3/18/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim (7.9); attend portion of teleconference with EB, HM, JHA, CH and ASA regarding case updates and high priority action items (0.2); assist HM in the identification of Building D documents for detailed timeline (0.8); amend summary and analysis of Building D documents for detailed timeline (0.2).	9.10	525.00	4,777.50
3/18/25	LS	Telephone call with attorney E. Brannen to discuss high priority targeted search requests (0.4) targeted search, review of search results, and compilation of findings relating to Temple for attorney EB (1.6); targeted search, review of search results, and compilation of findings related executed Building D contracts for EB, JS, and HM (5.6).	7.60	625.00	4,750.00
3/19/25	VO	Confer with PS and JS regarding key strategic issues.	.50	1025.00	512.50
3/19/25	PS	Review documents provided and curated by J. Stokes for purposes of assessing key strategic issues pertaining to damages claim, potential settlement, and proposed plan terms (3.6); confer with JS and VO regarding same (0.5).	4.10	1450.00	5,945.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/19/25	EB	Assess status and high priority action items in support of Whinstone settlement and SAFE issues (1.0); attend teleconference with TB regarding investor priority claims and research (0.2); review and analyze initial research from P. Tomasco (0.3); revise objections to SAFE claim to incorporate edits from VO (0.2); continue assessing strategic issues (0.8); correspond with patent prosecution counsel regarding status of pending patent applications (0.1); advise associates and TT regarding status and high priority action items (0.4); assess further documents located by LS (1.0); attend teleconference with TT regarding analysis of documents in support of settlement (0.2); confer with BA regarding appeal status and coverage of non-stayed deadlines (0.2); review BA and JS comments and propose further revisions to term sheet (0.6); correspond with co-counsel regarding same (0.1).	5.10	1250.00	6,375.00
3/19/25	BA	Review revisions to term sheet and convey suggested edits to JS and EB (0.3); correspond with P. Tomasco regarding upcoming deadlines and confer with EB regarding appeal deadlines and term sheet (0.2); review draft motion to approve settlement and convey suggested edits to EB and JS (0.4); review initial admitted exhibit list from JH, correspond with JH regarding revisions to same, and correspond with HM regarding review and revision of same (0.4).	1.30	1200.00	1,560.00
3/19/25	JS	Confer with PS and VO regarding key strategic issues.	.50	1025.00	512.50
3/19/25	TB	Confer with E. Brannen regarding priority of appeal issues and issues regarding investor interest in bankruptcy (0.2); Plan research and research regarding bankruptcy rules regarding investor interest (5.4).	5.60	1200.00	6,720.00
3/19/25	MS	Conduct legal research regarding fraudulent inducement issue (1.4); review and analyze [redacted] complaint and research and analyze issues as requested by EB and JS in support of settlement (2.5).	3.90	1100.00	4,290.00
3/19/25	HM	Conduct research and draft notice of withdrawal as counsel for HM.	1.10	700.00	770.00
3/19/25	TT	Analyze and summarize third party materials for EB in support of potential Whinstone settlement.	6.50	525.00	3,412.50

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Date	Tkpr	Description	Hours	Rate	Amount
3/20/25	VO	Attend teleconference with team regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms (0.8); confer with PS and JS regarding key strategic issues (0.8).	1.60	1025.00	1,640.00
3/20/25	PS	Review documents provided and curated by JS for purposes of assessing key strategic issues pertaining to damages claim, potential settlement, and proposed plan terms (3.1); confer with VO and JS regarding same (0.8).	3.90	1450.00	5,655.00
3/20/25	EB	Review client and counsel initial comments on motion to assume, propose further revisions, and correspond with client and co-counsel regarding same (0.9); prepare for (0.5) and lead (0.8) Stris team meeting regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms; review updates from TT regarding further analysis (0.2); correspond with JS and TT regarding next steps in support of same (0.1); continue analyzing SAFE issues, further revise, and correspond with co-counsel regarding objection to SAFE claim (2.6); attend portion of teleconference with JS, clients, and co-counsel regarding same (0.5); review and respond to further team correspondence and additional SAFE discovery- related correspondence (0.3).	5.90	1250.00	7,375.00
3/20/25	BA	Correspond with EB regarding term sheet (0.1); participate in portion of teleconference regarding strategy for plan and SAFE issues (0.5); correspond and confer with HM regarding exhibit list for appeal (0.3); attend portion of teleconference with EB, TB, JS, VO, CS, PB, SR, HM, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms (0.5).	1.40	1200.00	1,680.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/20/25	JS	Continued work on SAFE issues in connection with Whinstone settlement (3.8); attend call with client and counsel teams regarding same (1.1); review and evaluate further correspondence from SAFEs regarding document requests related to litigation team (1.3); review and evaluate issues affecting Debtors in connection with SAFE subpoena of Imperium (0.9); attend teleconference with EB, BA, TB, VO, CS, PB, SR, HM, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	7.90	1025.00	8,097.50
3/20/25	SR	Attend teleconference with EB, BA, TB, JS, VO, CS, PB, HM, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	.80	750.00	600.00
3/20/25	TB	Legal research regarding subordination of claims (5.1); Attend teleconference with EB, BA, JS, VO, CS, PB, SR, HM, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms. (0.8).	5.90	1200.00	7,080.00
3/20/25	CS	Attend teleconference with EB, BA, TB, JS, VO, PB, SR, HM, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	.80	850.00	680.00
3/20/25	CHH	Attend teleconference with EB, BA, TB, JS, VO, CS, PB, SR, HM, MV, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	.80	350.00	280.00
3/20/25	JHA	Attend teleconference with EB, BA, TB, JS, VO, CS, PB, SR, HM, MV, CHH and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	.80	350.00	280.00
3/20/25	PB	Attend teleconference with EB, BA, TB, JS, VO, CS, PB, SR, HM, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	.80	850.00	680.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/20/25	ASA	Attend teleconference with EB, BA, TB, JS, VO, CS, PB, SR, HM, MV, CHH and JHA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms (0.8); assist HM with preparation of notice of withdrawal as counsel (1.0).	1.80	350.00	630.00
3/20/25	HM	Create Exhibit List for Appeal document for BA (6.8); attend teleconference with EB, BA, TB, JS, VO, CS, PB, SR, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms (0.8).	7.60	700.00	5,320.00
3/20/25	TT	Analyze and summarize additional Rhodium (5.0) and SEC (4.0) materials for EB in support of potential Whinstone settlement.	9.00	525.00	4,725.00
3/20/25	MV	Attend teleconference with EB, BA, TB, JS, VO, CS, PB, SR, HM, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	.80	425.00	340.00
3/21/25	VO	Emails and confer with team regarding preparation of correspondence to counsel for SAFE AHG regarding Whinstone settlement, and analyze issues relating to same.	2.20	1025.00	2,255.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/21/25	EB	Attend teleconference with JS regarding high priority action items including response to discovery requests from counsel for SAFEs (0.7); review proposed final motion, term sheet, and proposed order (0.3); attend teleconference with client and co-counsel to discuss same (0.8); correspond with prosecution counsel (0.1); correspond with and advise CS regarding research in support of opposition to SAFE discovery requests (0.2); continue analyzing SAFE discovery issues (0.3); correspond with TT regarding revisions to memorandum (0.1); revise correspondence to counsel for SAFEs and correspond with BA, JS, co-counsel and clients regarding further revisions to same (0.7); review privilege research and memorandum from co-counsel (0.5); revise, finalize, and send response to most recent correspondence responding to SAFE discovery demands including agreed upon confidential projections document (0.6); begin analyzing materials from prosecution counsel (1.0); review proposed press release and correspondence from co-counsel regarding same (0.1); review Stris team correspondence including regarding SAFE research updates from TB (0.2).	5.60	1250.00	7,000.00
3/21/25	BA	Correspond with CS and P. Tomasco regarding appeal designations (0.2); review correspondence from K. Yang, review draft motion for protective order, and correspond with team regarding potential responses to SAFE counsel (0.4).	.60	1200.00	720.00
3/21/25	JS	Evaluate follow-on issues related to the Whinstone settlement and its impacts on potential plan confirmation (2.7); review, evaluate, and respond to discovery issues related to SAFE requests as to Stris and Lehotsky fees (2.0); prepare discovery correspondence related to SAFE involvement in Whinstone mediation (2.8); confer with EB regarding high priority action items including response to discovery requests regarding Stris and LKC fees in the Whinstone litigation (0.7).	8.20	1025.00	8,405.00
3/21/25	TB	Legal research regarding contracts potentially bearing upon Whinstone settlement (4.4); draft quick summary regarding assessment of same (0.6).	5.00	1200.00	6,000.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/21/25	CS	Review and analyze case law in preparation for responding to SAFE Committee discovery requests and begin drafting memorandum regarding the same.	5.50	850.00	4,675.00
3/21/25	TT	Analyze and summarize additional SEC materials for EB in support of Whinstone settlement issues.	1.50	525.00	787.50
3/22/25	EB	Review, analyze, and correspond with P. Tomasco, JS regarding further correspondence to counsel for SAFEs (0.2); review publicly available materials and update ERCOT expert regarding matter status (0.1); continue evaluating settlement implications with respect to SAFE and additional third party asserted claims and positions (1.0).	1.30	1250.00	1,625.00
3/22/25	JS	Further evaluate interaction of SAFEs with Whinstone settlement.	1.90	1025.00	1,947.50
3/23/25	EB	Review correspondence from SAFE counsel and correspond with JS and co-counsel regarding response to same (0.2); review drafts and correspondence from BA for upcoming non-stayed appellate filing and correspond with BA, JS, and CS regarding potential revisions to same (0.6).	.80	1250.00	1,000.00
3/23/25	BA	Correspond with P. Tomasco and with CS and team regarding appeal designations and related filings (0.3); review new proof of claim from N. Cerasuolo (0.1); review correspondence with SAFE AHGs (0.2).	.60	1200.00	720.00
3/23/25	JS	Further discovery correspondence regarding SAFE interaction with Whinstone settlement issues.	1.10	1025.00	1,127.50
3/24/25	EB	Prepare for (0.2) and attend (0.4) teleconference with prosecution counsel; continue analyzing related materials and correspond with prosecution counsel and clients regarding potential interim action items and questions (1.0); review further correspondence from mediator and SAFE counsel and correspond with JS and P. Tomasco regarding response to same (0.2); propose revisions to non-abated appellate filing and correspond with BA, JS, and CS regarding same (0.2).	2.00	1250.00	2,500.00
3/24/25	BA	Correspond with CS and EB regarding appeal designations, review and revise same, correspond with P. Tomasco regarding same, correspond with M. Moore and opposing counsel regarding filing of same and need for stipulation to abate further deadlines, and approve filing of same.	1.10	1200.00	1,320.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/24/25	JS	Continued work regarding SAFE interaction with Whinstone settlement and related next steps.	4.90	1025.00	5,022.50
3/24/25	CS	Review, revise, finalize, and file appellees' designations to record for appeal to district court.	1.20	850.00	1,020.00
3/24/25	CHH	Assist JS with research and collection of documents from discovery database.	.20	350.00	70.00
3/25/25	EB	Attend portion of checkpoint teleconference with BA, JS, clients, and co-counsel regarding status and high priority action items including with respect to IP (0.2); review and respond to correspondence from JS regarding client instructions and update MS and TB regarding same (0.1).	.30	1250.00	375.00
3/25/25	JS	Continued work on interaction of SAFE with Whinstone settlement and related issues (2.3); attend weekly touchpoint call (0.4).	2.70	1025.00	2,767.50
3/25/25	CS	Continue reviewing and analyzing case law in preparation for responding to SAFE discovery concerning Whinstone settlement and continue drafting memorandum regarding the same.	3.30	850.00	2,805.00
3/25/25	JHA	Prepare draft stipulation to abate deadlines at BA request.	2.20	350.00	770.00
3/26/25	EB	Attend teleconference with W. Thompson regarding expert report and analysis inquiry from [redacted] (0.1); correspond with BA, JS, ASA, JHA, and W. Thompson regarding response to same (0.2); confer with [redacted] and [redacted] regarding high priority action items including upcoming renewal deadline for document vendor (0.1); correspond with Stris team members regarding timing and correspondence with vendor regarding same (0.1).	.50	1250.00	625.00
3/26/25	BA	Review expert reports and correspond with EB and JS regarding inquiry from [redacted] (0.5); revise proposed stipulation to abate appeal deadlines, correspond with P. Tomasco, and advise JH regarding further revisions to same (0.4).	.90	1200.00	1,080.00
3/26/25	JHA	Edit draft Stipulation to Abate Deadlines at BA request.	.10	350.00	35.00
3/27/25	EB	Correspond with Stris team and vendor regarding document hosting renewal options.	.10	1250.00	125.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/28/25	EB	Correspond with vendor to reiterate time-sensitive request for document hosting platform renewal options (0.1); communicate with Stris team members regarding assessment of data hosting size and anticipated needs (0.1).	.20	1250.00	250.00
3/28/25	ASA	Analyze data hosting needs and correspond with vendor regarding data usage at request of EB ahead of renewal deadline.	.40	350.00	140.00
3/31/25	PS	Review mediation appointment order (0.1); confer with team regarding same (0.1).	.20	1450.00	290.00
3/31/25	EB	Correspond with Stris team and vendor and assign MV to assess data hosting size and anticipated needs and pricing options (0.2); attend teleconference with MV and review update from MV regarding status of discussions (0.2); update [redacted] regarding same (0.1).	.50	1250.00	625.00
3/31/25	BA	Review mediation appointment order (0.1); correspond with PS, JS, and EB regarding plan mediation and upcoming hearings and confer with EB regarding same (0.2).	.30	1200.00	360.00
3/31/25	CHH	Correspond with vendor regarding discovery platform usage, issues, and needs in advance of potential renewal.	.30	350.00	105.00
3/31/25	JHA	Update files and attend to detailed tracking regarding recent filings and case developments.	1.00	350.00	350.00
3/31/25	MV	Correspond with vendor regarding options for potential contract renewal (0.3); obtain options from separate vendor and correspond regarding potential data transfer needs (0.2); analyze and correspond with EB regarding options (0.3); attend teleconference with MV regarding same (0.2).	1.00	425.00	425.00
		TOTAL PROFESSIONAL SERVICES			**$ 493,202.50**

Stris & Maher LLP

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SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	23.80	1,450.00	34,510.00
Elizabeth Brannen	EB	Partner	61.50	1,250.00	76,875.00
Bridget Asay	BA	Partner	27.60	1,200.00	33,120.00
Tillman Breckenridge	TB	Partner	47.90	1,200.00	57,480.00
Matthew Seligman	MS	Partner	23.80	1,100.00	26,180.00
Victor O'Connell	VO	Partner	18.90	1,025.00	19,372.50
John Stokes	JS	Partner	73.90	1,025.00	75,747.50
Colleen Smith	CS	Associate	44.80	850.00	38,080.00
Peter Brody	PB	Associate	4.00	850.00	3,400.00
Sarah Rahimi	SR	Associate	8.70	750.00	6,525.00
Helen Marsh	HM	Associate	21.90	700.00	15,330.00
Lisa Sherrod	LS	Lead Discovery Assoc	15.30	625.00	9,562.50
Tanya Tice	TT	Discovery Associate	132.70	525.00	69,667.50
Monica Viramontes	MV	Sr Paralegal	11.90	425.00	5,057.50
Andrew Atsalis	ASA	Fellow	26.30	350.00	9,205.00
Cynthia Huang	CHH	Fellow	7.70	350.00	2,695.00
Nicholas Capalbo	NC	Fellow	3.10	350.00	1,085.00
Jaida Hodge-Adams	JHA	Fellow	26.60	350.00	9,310.00
Total			**580.40**		**$ 493,202.50**

Invoice # 14517 April 23, 2025

EXPENSES ADVANCED

Date	Task	Description	Amount
2/11/25		BA airfare for mediation.	1,168.35
2/17/25		VO Airfare to Dallas for mediation.	560.49
2/19/25		BA transportation while in Dallas for mediation.	82.64
2/19/25		VO transportation for mediation.	161.63
2/20/25		BA transportation while in Dallas for mediation.	88.48
2/20/25		VO lodging in Dallas for mediation.á	651.89
2/20/25		VO airfare for mediation.	216.99
2/21/25		BA lodging for mediation in Dallas.	1,466.64
2/21/25		BA airpot parking for mediation.	36.00
3/05/25		CS pro hac application fee.	100.00
3/05/25		PS pro hac application fee.	100.00
3/05/25		JS pro hac application fee.	100.00
3/05/25		BA pro hac application fee.	100.00
3/17/25		Setec invoice - forensic investigation.	2,776.30
4/01/25		Logikcull Discovery Solutions (April 2025).	2,646.00
		TOTAL EXPENSES ADVANCED	**$ 10,255.41**
		TOTAL THIS INVOICE	**$ 503,457.91**

Invoice # 14517 April 23, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14366	1/13/25	132,202.25	111,327.25	20,875.00
14459	2/21/25	840,030.97	713,078.47	126,952.50
14486	3/28/25	754,873.12	.00	754,873.12

Previous Balance	$ 902,700.62
Balance Due This Invoice	$ 503,457.91
TOTAL BALANCE DUE	**$ 1,406,158.53**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 754,873.12	$ .00	$ 126,952.50	$ 20,875.00	$ .00	$ 902,700.62

Stris

April 23, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14532
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through March 31, 2025

RE: Retention and Fee Applications

Total Professional Services	$ 11,102.50
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 11,102.50**
Previous Balance	$ 19,149.50
TOTAL BALANCE DUE	**$ 30,252.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14532 April 23, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
3/05/25	EB	Begin working on February monthly fee statement.	.50	1250.00	625.00
3/06/25	VO	Attention to process for quarterly fee application (0.2); prepare certificate of no objection (0.1).	.30	1025.00	307.50
3/11/25	EB	Work on monthly fee statement (0.4); advise NC regarding same (0.1).	.50	1250.00	625.00
3/12/25	NC	Assist EB with portions of monthly fee statement.	1.20	350.00	420.00
3/27/25	EB	Continue working on portion of monthly fee statement.	1.90	1250.00	2,375.00
3/28/25	EB	Continue preparing monthly fee statement.	2.80	1250.00	3,500.00
3/31/25	EB	Continue preparing monthly fee statement.	2.60	1250.00	3,250.00
		TOTAL PROFESSIONAL SERVICES			**$ 11,102.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	8.30	1,250.00	10,375.00
Victor O'Connell	VO	Partner	.30	1,025.00	307.50
Nicholas Capalbo	NC	Fellow	1.20	350.00	420.00
Total			**9.80**		**$ 11,102.50**

TOTAL THIS INVOICE **$ 11,102.50**

Stris & Maher LLP

Invoice # 14532 April 23, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14381	1/13/25	6,285.00	5,028.00	1,257.00
14472	2/21/25	8,575.00	6,860.00	1,715.00
14499	3/28/25	16,177.50	.00	16,177.50

Previous Balance	$ 19,149.50
Balance Due This Invoice	$ 11,102.50
TOTAL BALANCE DUE	**$ 30,252.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 16,177.50	$ .00	$ 1,715.00	$ 1,257.00	$ .00	$ 19,149.50

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 EIGHTH MONTHLY FEE STATEMENT
FOR THE PERIOD APRIL 1, 2025, THROUGH APRIL 30, 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 April 1, 2025, through April 30, 2025 (the "Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $63,240.00 (80% of the services rendered), plus $7,530.00 (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.

[1] 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 (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 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;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (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 (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 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 (ha.nguyen@usdoj.gov), 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 22nd day of May, 2025.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
Patricia B. Tomasco (SBN 01797600)
Joanna D. Caytas (SBN 24127230)
Cameron Kelly (SBN 24120936)
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-and-

STRIS & MAHER LLP

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-and-

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408 W. 11th Street, 5th Floor
Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on May 22, 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

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	52.3	$55,720.00	$44,576.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	2.7	$3,037.50	$2,430.00
007	Retention and Fee Applications	21.4	$20,292.50	$16,234.00
Total		76.4	$79,050.00	$63,240.00

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	2.10	$2,625.00
Victor O'Connell	Partner	2012	1,025.00	.30	$307.50
Andrew Atsalis	Litigation Fellow	N/A	350.00	.30	$105.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	24.00	$30,000.00
Bridget Asay	Partner	1997	1,200.00	12.20	$14,640.00
John Stokes	Partner	2016	1,025.00	7.90	$8,097.50
Monica Viramontes	Senior Paralegal	N/A	425.00	1.50	$637.50
Andrew Atsalis	Litigation Fellow	N/A	350.00	.40	$140.00
Cynthia Huang	Litigation Fellow	N/A	350.00	.30	$105.00
Sebastian Delgado	Litigation Fellow	N/A	350.00	.40	$140.00
Jaida Hodge-Adams	Litigation Fellow	N/A	350.00	5.60	$1,960.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	9.80	$12,250.00
Victor O'Connell	Partner	2012	1,025.00	5.90	$6,047.50
Cynthia Huang	Litigation Fellow	N/A	350.00	4.40	$1,540.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	1.30	$455.00

EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
E-discovery platform fees	$7,530.00
Total	$7,530.00

EXHIBIT 4

Stris

May 14, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14560
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through April 30, 2025

RE: Midas Green Litigation

Total Professional Services	$ 3,037.50
Total Expenses Advanced	$ 7,530.00
TOTAL THIS INVOICE	**$ 10,567.50**
Previous Balance	$ 37,579.00
TOTAL BALANCE DUE	**$ 48,146.50**

Electronic Invoice

Stris & Maher LLP

Invoice # 14560 May 14, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
4/10/25	EB	Communicate with [redacted] regarding status of district court case and objection to Midas proof of claim (0.1); analyze current draft opposition to same (0.4); correspond with P. Tomasco regarding same and related action items with respect to district court (0.1).	.60	1250.00	750.00
4/15/25	EB	Communicate with CHH and ASA regarding status and analyze information in support of responding to client inquiry (0.1); correspond with [redacted], B. Rice, P. Tomasco, and D. Holzman regarding same (0.1).	.20	1250.00	250.00
4/16/25	VO	Review and revise EB declaration in support of objection to Midas Green's proof of claim.	.30	1025.00	307.50
4/16/25	EB	Confirm information (0.1) and revise declaration in support of objection to Midas Green claim (0.9); correspond with VO (0.1) and R. Harrington (0.1) regarding revisions to same.	1.20	1250.00	1,500.00
4/16/25	ASA	Collect requested documentation at request of EB to assist with drafting of declaration in support of Rhodium's objection to Midas Green's proof of claim.	.30	350.00	105.00
4/22/25	EB	Instruct ASA regarding status and action items following submission of amended objection to Midas Green proof of claim.	.10	1250.00	125.00
		TOTAL PROFESSIONAL SERVICES			**$ 3,037.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	2.10	1,250.00	2,625.00
Victor O'Connell	VO	Partner	.30	1,025.00	307.50
Andrew Atsalis	ASA	Fellow	.30	350.00	105.00
Total			**2.70**		**$ 3,037.50**

Invoice # 14560 May 14, 2025

EXPENSES ADVANCED

Date	Task	Description	Amount
1/31/25		JND Discovery Invoice for January 2025.	3,765.00
3/31/25		JND Discovery Invoice for March 2025.	3,765.00
		TOTAL EXPENSES ADVANCED	**$ 7,530.00**
		TOTAL THIS INVOICE	**$ 10,567.50**

Stris & Maher LLP

Invoice # 14560 May 14, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14380	1/13/25	8,990.00	7,192.00	1,798.00
14471	2/21/25	25,380.00	21,057.00	4,323.00
14498	3/28/25	15,240.00	12,192.00	3,048.00
14530	4/23/25	28,410.00	.00	28,410.00

Previous Balance	$ 37,579.00
Balance Due This Invoice	$ 10,567.50
TOTAL BALANCE DUE	**$ 48,146.50**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 28,410.00	$ 3,048.00	$ 4,323.00	$ .00	$ 1,798.00	$ 37,579.00

Stris

May 14, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14547
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through April 30, 2025

RE: Whinstone Litigation

Total Professional Services	$ 55,720.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 55,720.00**
Previous Balance	$ 798,574.91
TOTAL BALANCE DUE	**$ 854,294.91**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Invoice # 14547 May 14, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
4/01/25	EB	Correspond with MV regarding and analyze document hosting options and recommendations (0.2); correspond with Rhodium regarding same (0.1); correspond with BA and JS and review correspondence from co-counsel regarding high priority action items including motion to stay appeal deadlines (0.1); advise MV regarding correspondence with vendor and review same (0.1).	.50	1250.00	625.00
4/01/25	BA	Correspond with EB and JS regarding abatement of appeal deadlines pending settlement (0.1); revise draft proposed filing regarding same (0.4); correspond with P. Tomasco regarding further edits to same, and convey draft of same to M. Moore for review (0.1).	.60	1200.00	720.00
4/01/25	MV	Assess and negotiate vendor renewal hosting contract and cold storage options including with alternative vendor (1.3); provide options to EB for next steps (0.2).	1.50	425.00	637.50
4/04/25	EB	Review and comment on draft settlement agreement (0.7); correspond with BA, JS, and VO regarding same (0.1).	.80	1250.00	1,000.00
4/04/25	BA	Review, analyze, and propose edits on draft settlement agreement (2.6); convey same to JS and EB for further review (0.1); review comments from JS, EB, and W. Thompson (0.1); convey edits and comments on draft settlement agreement from Stris team to P. Tomasco (0.2).	3.00	1200.00	3,600.00
4/07/25	BA	Review witness and exhibits lists, and exhibits, for settlement hearing (0.5); correspond with JS regarding settlement hearing (0.2).	.70	1200.00	840.00
4/08/25	EB	Review update from BA regarding client checkpoint teleconference and correspond with BA and JS regarding resulting action items (0.1); communicate with [redacted] regarding upcoming license review (0.1).	.20	1250.00	250.00

Stris & Maher LLP

Invoice # 14547 May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/08/25	BA	Attend hearing on settlement approval by telephone (0.6); review order approving settlement (0.2); participate in portion of weekly client update call with [redacted] W. Thompson, and J. Cohn (0.5); correspond with JS, EB, and PS regarding status of LKC fee dispute in connection with Whinstone litigation (0.3).	1.60	1200.00	1,920.00
4/09/25	EB	Begin analyzing draft license agreement as requested by [redacted] (1.0); correspond with [redacted] and [redacted] regarding same (0.1); attend teleconference with [redacted] regarding same (0.3).	1.40	1250.00	1,750.00
4/09/25	JHA	Detailed tracking of docket updates for bankruptcy proceeding, adversary proceeding, bankruptcy appeal, and district court appeal.	1.00	350.00	350.00
4/10/25	EB	Continue analyzing and propose revisions to draft license agreement (1.9); prepare for and attend teleconference with [redacted] and [redacted] regarding same (0.9); further revise same to incorporate client feedback (0.8); correspond with [redacted] regarding additional information in support of same (0.1).	3.70	1250.00	4,625.00
4/10/25	BA	Correspond with EB, JS, and team regarding client's position on potential fee dispute.	.20	1200.00	240.00
4/10/25	JHA	Attention to detailed tracking of further docket updates for bankruptcy proceeding.	.20	350.00	70.00
4/13/25	EB	Begin reviewing and analyzing Whinstone proposed changes to license agreement.	.50	1250.00	625.00
4/13/25	BA	Review bankruptcy appeal rules and correspond with P. Tomasco, JS, and W. Thompson regarding [redacted] regarding stay of appellate deadlines.	.20	1200.00	240.00

Invoice # 14547 May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/14/25	EB	Continue analyzing Whinstone proposed changes to license agreement (0.9); correspond with co-counsel and client regarding same (0.2); attend teleconference to discuss same and proposed further changes (0.8); implement same (0.4); analyze PSA confidentiality provision and related client and co-counsel correspondence (0.2); propose revisions and correspond with co-counsel and clients regarding same (0.2); review correspondence from [redacted] regarding and provide feedback on and propose revisions to additional provision of PSA concerning patent claims (0.2).	2.90	1250.00	3,625.00
4/14/25	CHH	Assist EB with fact research and information from various docket items in support of drafting of portion of PSA.	.30	350.00	105.00
4/14/25	ASA	Provide informaiton and documentation to EB as requested to support potential revisions to settlement agreement.	.40	350.00	140.00
4/15/25	EB	Prepare for and attend teleconference with JS, W. Thompson, and client contacts regarding status and high priority action items including PSA and license agreement progression and anticipated timing of Whinstone close (0.2); analyze Whinstone's proposed changes to license agreement and correspond with [redacted] P. Tomasco, and D. Holzman regarding same (1.5); attend teleconference with [redacted] P. Tomasco, and D. Holzman regarding same (0.4); revise same (0.3); review client questions and correspond with D. Holzman regarding proposed revisions to confidentiality provision of PSA (0.3); review and advise in response to inquiry from [redacted] regarding PSA disclosure of status of Midas Green claim (0.4).	3.10	1250.00	3,875.00
4/16/25	EB	Correspond with [redacted] and P. Tomasco regarding status and rescheduling of hearing on objections to updated LKC retention application.	.10	1250.00	125.00
4/16/25	JHA	Update bankruptcy docket to reflect and track recent filings and documents.	.50	350.00	175.00
4/17/25	EB	Communicate with JS regarding high priority action items including continuance (0.1); review Whinstone further changes to license agreement and correspond with clients and co-counsel regarding same (0.2).	.30	1250.00	375.00

Invoice # 14547 May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/18/25	EB	Continue analyzing license agreement and confidentiality PSA provision proposed changes (0.2); attend call with client and co-counsel (1.0); prepare for (0.5) and attend (0.7) meet and confer call with co-counsel and counsel for Whinstone to discuss same; confer with D. Holtzman regarding further revisions to same (0.3); correspond with JS regarding status and high priority action items (0.1).	2.80	1250.00	3,500.00
4/18/25	JS	Review and evaluate extension request and confer with team regarding next steps on same.	.90	1025.00	922.50
4/21/25	EB	Review filings and correspondence and correspond with BA, JS, [redacted], and co-counsel regarding status and high priority action items including review of proposed revisions to PSA.	.50	1250.00	625.00
4/21/25	BA	Correspond with JS and EB regarding status of LKC fee matter, Stris retention, and Whinstone settlement (0.1); review draft motion for extension of time with respect to LKC fee matter and correspond with EB and JS regarding same (0.2).	.30	1200.00	360.00
4/22/25	EB	Correspond with [redacted], and co-counsel regarding response to Whinstone [redacted] request (0.2); attend teleconference with [redacted] regarding same and next steps (0.1); correspond with BA and JS regarding high priority action items (0.2); correspond with counsel for Whinstone regarding interim response to [redacted] and to inquire about timing on license agreement comments (0.1); review correspondence from prosecution counsel and respond regarding status of two additional applications (0.1); analyze Whinstone proposed further revisions to license agreement and correspond with D. Holzman regarding proposed further response to same (0.4); attend checkpoint teleconference with [redacted], BA, JS, and co-counsel (0.5); confer with [redacted] regarding proposed further changes on license agreement (0.1); revise and correspond with clients and P. Tomasco regarding same (0.2); correspond with counsel for Whinstone regarding same (0.1).	2.00	1250.00	2,500.00

Invoice # 14547 May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/22/25	BA	Review discovery from LKC to Rhodium and correspond with JS and EB regarding same (0.2); review objection filed by SAFEs and review calendar/docket regarding status of emergency extension request, and correspond with JS and EB regarding same (0.2); participate in team call with client ([redacted]) and JS, EB, W. Thompson and J. Cohn to discuss pending matters including status of settlement documents and LKC fee dispute (0.5).	.90	1200.00	1,080.00
4/22/25	JHA	Attention to detailed tracking of further docket updates and document management for bankruptcy proceeding.	2.00	350.00	700.00
4/23/25	EB	Analyze and communicate with client contacts, co-counsel, prosecution counsel, and counsel for Whinstone regarding further revisions to license agreement and PSA confidentiality provision (1.7); instruct litigation fellows and qc confidentiality designations on patent applications (0.2); correspond with prosecution counsel, client contacts, and counsel for Whinstone regarding same (0.1); correspond with JS and BA regarding status and high priority action items including Rhodium's position on discovery and disclosure in response to new requests (0.4); review draft [redacted] declaration (0.2); confer with BA and JS regarding analysis of and potential revisions to draft [redacted] declaration (0.5).	3.10	1250.00	3,875.00
4/23/25	BA	Confer with JS and EB regarding analysis of and potential revisions to draft [redacted] declaration.	.50	1200.00	600.00
4/23/25	JS	Attend to high priority action items regarding LKC retention application (2.1); attend status conference addressing in part same (0.3).	2.40	1025.00	2,460.00
4/23/25	JHA	Attention to detailed tracking of further docket updates.	.90	350.00	315.00
4/24/25	EB	Review and analyze revised [redacted] declaration from BA (0.2); confer with BA, [redacted] regarding same (0.5); further revise same (0.3); correspond with BA and JS regarding proposed dismissal papers (0.1).	1.10	1250.00	1,375.00

Invoice # 14547 May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/24/25	BA	Draft proposed declaration for [redacted] in connection with LKC fee (2.2); confer with [redacted], and EB regarding same (0.5); confer with JS and with JS and [redacted] regarding issues related to LKC fee and Whinstone settlement (0.3); review proposed dismissal papers and accompanying orders for purposes of executing Whinstone settlement and correspond with EB and JS regarding same (0.4).	3.40	1200.00	4,080.00
4/24/25	JS	Further work on high priority action items in connection with revised LKC retention application.	3.30	1025.00	3,382.50
4/24/25	SD	Assist BA with preparation of [redacted] declaration.	.40	350.00	140.00
4/25/25	EB	Attend teleconference with co-counsel and counsel for Whinstone regarding final action items in support of execution of settlement, license, and accompanying documents (0.2); review updates and correspond with PS, BA, VO, and JS regarding same and anticipated closing and dismissal timing (0.1).	.30	1250.00	375.00
4/25/25	BA	Review edits from [redacted] on draft declaration and correspond with [redacted] regarding same (0.2); confer with JS regarding status conference and LKC fee matter (0.2).	.40	1200.00	480.00
4/25/25	JS	Prepare for (0.3) and attend (0.2) status conference regarding LKC fee dispute.	.50	1025.00	512.50
4/29/25	EB	Review and confirm filing of dismissal papers and correspond with BA regarding upcoming teleconference with [redacted].	.10	1250.00	125.00
4/29/25	BA	Correspond with JS regarding status of mediation and [redacted] declaration, correspond with JS, EB, and client regarding meeting to discuss [redacted] declaration, review various court orders on filings implementing settlement, and correspond with litigation team regarding Milam County filing.	.20	1200.00	240.00
4/29/25	JS	Further work on high priority action items for LKC revised retention application.	.80	1025.00	820.00

Stris & Maher LLP

Invoice # 14547 May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/30/25	EB	Review correspondence from counsel for Whinstone regarding software and transition support (0.1); communicate with PS, BA, VO, and JS regarding status and high priority action items (0.2); prepare for and attend teleconference with [redacted] and P. Tomasco regarding response to Whinstone inquiry and review further updates regarding same (0.3).	.60	1250.00	750.00
4/30/25	BA	Review correspondence from Whinstone's counsel and client regarding transition issues and correspond with EB regarding same.	.20	1200.00	240.00
4/30/25	JHA	Attention to detailed tracking of further docket updates and document organization for bankruptcy proceeding, adversary proceeding, and district court appeal.	1.00	350.00	350.00
		TOTAL PROFESSIONAL SERVICES			**$ 55,720.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	24.00	1,250.00	30,000.00
Bridget Asay	BA	Partner	12.20	1,200.00	14,640.00
John Stokes	JS	Partner	7.90	1,025.00	8,097.50
Monica Viramontes	MV	Sr Paralegal	1.50	425.00	637.50
Andrew Atsalis	ASA	Fellow	.40	350.00	140.00
Cynthia Huang	CHH	Fellow	.30	350.00	105.00
Sebastian Delgado	SD	Fellow	.40	350.00	140.00
Jaida Hodge-Adams	JHA	Fellow	5.60	350.00	1,960.00
Total			**52.30**		**$ 55,720.00**

TOTAL THIS INVOICE **$ 55,720.00**

Invoice # 14547 May 14, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14366	1/13/25	132,202.25	111,327.25	20,875.00
14459	2/21/25	840,030.97	713,078.47	126,952.50
14486	3/28/25	754,873.12	607,583.62	147,289.50
14517	4/23/25	503,457.91	.00	503,457.91

Previous Balance	$ 798,574.91
Balance Due This Invoice	$ 55,720.00
TOTAL BALANCE DUE	**$ 854,294.91**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 503,457.91	$ 147,289.50	$ 126,952.50	$ .00	$ 20,875.00	$ 798,574.91

Stris

May 14, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14561
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through April 30, 2025

RE: Retention and Fee Applications

Total Professional Services	$ 20,292.50
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 20,292.50**
Previous Balance	$ 17,310.00
TOTAL BALANCE DUE	**$ 37,602.50**

Electronic Invoice

Invoice # 14561 May 14, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
3/25/25	NC	Assist EB with preparation of fee statements.	1.30	350.00	455.00
4/02/25	VO	Prepare February 2025 fee application.	1.50	1025.00	1,537.50
4/10/25	VO	Work on quarterly fee application (1.0); advise CHH regarding action items and next steps in support of same (0.1).	1.10	1025.00	1,127.50
4/12/25	EB	Assess and begin working on amended retention application to clarify scope to include representing Debtors in response to objections to LKC amended retention agreement.	.50	1250.00	625.00
4/13/25	EB	Attend teleconference with [redacted] regarding status and action items in support of amended retention application (0.3); update PS, VO, and JS regarding same and correspond with VO regarding related materials (0.1); continue working on same (0.5).	.90	1250.00	1,125.00
4/14/25	VO	Emails with EB regarding amended retention application.	.20	1025.00	205.00
4/14/25	EB	Continue preparing amended retention application (0.7); correspond with PS, VO, JS, [redacted] and [redacted] regarding same (0.1).	.80	1250.00	1,000.00
4/15/25	VO	Review and revise application to update retention order (0.8); emails with team regarding same (0.2).	1.00	1025.00	1,025.00
4/15/25	EB	Revise proposed order in support of amended and clarified retention application to incorporate feedback from [redacted] (0.1); update VO regarding status and continue preparing amended application (0.7); correspond with [redacted] regarding same (0.1); further revise and prepare updated retention application and proposed order and correspond with clients and PS, VO, and JS regarding same (1.2).	2.10	1250.00	2,625.00
4/15/25	CHH	Assist VO in preparing second interim fee application.	4.20	350.00	1,470.00
4/16/25	VO	Further prepare quarterly fee application (0.8); correspond with CHH regarding same (0.1).	.90	1025.00	922.50
4/16/25	EB	Advise NC regarding preparation of portions of monthly fee statement.	.10	1250.00	125.00
4/17/25	VO	Correspond with EB regarding clarified retention application and supporting materials.	.30	1025.00	307.50

Invoice # 14561 May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/17/25	EB	Correspond with NC and review portions of monthly fee statement (0.1); communicate with [redacted], P. Tomasco, B. Howell, and Stris Team regarding final revisions to and filing of updated Stris retention application and supporting materials (0.7).	.80	1250.00	1,000.00
4/17/25	CHH	Assist VO with finalizing second interim fee application and proposed order to same.	.20	350.00	70.00
4/22/25	EB	Continue preparing portions of monthly fee application.	1.70	1250.00	2,125.00
4/23/25	EB	Continue preparing portions of monthly fee application.	2.90	1250.00	3,625.00
4/28/25	VO	Prepare March monthly fee application (0.8); emails with B. Howell and client regarding filing of same (0.1).	.90	1025.00	922.50
		TOTAL PROFESSIONAL SERVICES			**$ 20,292.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	9.80	1,250.00	12,250.00
Victor O'Connell	VO	Partner	5.90	1,025.00	6,047.50
Cynthia Huang	CHH	Fellow	4.40	350.00	1,540.00
Nicholas Capalbo	NC	Fellow	1.30	350.00	455.00
Total			**21.40**		**$ 20,292.50**

TOTAL THIS INVOICE **$ 20,292.50**

Invoice # 14561 May 14, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14381	1/13/25	6,285.00	5,028.00	1,257.00
14472	2/21/25	8,575.00	6,860.00	1,715.00
14499	3/28/25	16,177.50	12,942.00	3,235.50
14532	4/23/25	11,102.50	.00	11,102.50

Previous Balance	$ 17,310.00
Balance Due This Invoice	$ 20,292.50
TOTAL BALANCE DUE	**$ 37,602.50**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 11,102.50	$ 3,235.50	$ 1,715.00	$ .00	$ 1,257.00	$ 17,310.00

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 NINTH MONTHLY FEE STATEMENT
FOR THE PERIOD MAY 1, 2025, THROUGH MAY 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 May 1, 2025, through May 31, 2025 (the "Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $143,678.00 (80% of the services rendered), plus $7,394.36 (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.

[1] 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 (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 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;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (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 (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 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 (ha.nguyen@usdoj.gov), 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 13th day of June, 2025.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
Patricia B. Tomasco (SBN 01797600)
Joanna D. Caytas (SBN 24127230)
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-and-

STRIS & MAHER LLP

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Victor O'Connell (pro hac vice)
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Peter Brody (pro hac vice)
Helen Marsh (pro hac vice)

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-and-

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408 W. 11th Street, 5th Floor
Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on June 13, 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

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	6.20	$6,170.00	$4,936.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	169.00	$159,317.50	$127,454.00
007	Retention and Fee Applications	13.10	$14,110.00	$11,288.00
Total		188.3	$179,597.50	$143,678.00

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	3.90	$4,875.00
Bridget Asay	Partner	1997	1,200.00	.40	$480.00
Colleen Smith	Partner	2015	850.00	.30	$255.00
Andrew Atsalis	Litigation Fellow	N/A	350.00	.20	$70.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	1.40	$490.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	53.00	$66,250.00
Bridget Asay	Partner	1997	1,200.00	32.00	$38,400.00
Victor O'Connell	Partner	2012	1,025.00	.50	$512.50
John Stokes	Partner	2016	1,025.00	33.60	$34,440.00
Colleen Smith	Associate	2015	850.00	2.30	$1,955.00
Peter Brody	Associate	2016	850.00	.40	$340.00
Monica Viramontes	Senior Paralegal	N/A	425.00	12.00	$5,100.00
Quoc Hoang	Legal Tech Specialist	N/A	350.00	.50	$175.00
Andrew Atsalis	Litigation Fellow	N/A	350.00	3.50	$1,225.00
Cynthia Huang	Litigation Fellow	N/A	350.00	.70	$245.00
Sebastian Delgado	Litigation Fellow	N/A	350.00	14.50	$5,075.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	.60	$210.00
Jaida Hodge-Adams	Litigation Fellow	N/A	350.00	15.40	$5,390.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	2.40	$3,000.00
Bridget Asay	Partner	1997	1,200.00	4.20	$5,040.00
Victor O'Connell	Partner	2012	1,025.00	.90	$922.50
John Stokes	Partner	2016	1,025.00	4.50	$4,612.50
Colleen Smith	Partner	2015	850.00	.30	$255.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	.70	$280.00

EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
E-discovery platform fees	$3,765.00
Total	$3,765.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
E-discovery platform fees	$2,646.00
E-discovery related costs	$983.36
Total	$3,629.36

EXHIBIT 4

Stris

June 10, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14587
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through May 31, 2025

RE: Midas Green Litigation

Total Professional Services	$ 6,170.00
Total Expenses Advanced	$ 3,765.00
TOTAL THIS INVOICE	**$ 9,935.00**
Previous Balance	$ 13,906.50
TOTAL BALANCE DUE	**$ 23,841.50**

Electronic Invoice

Invoice # 14587 June 10, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
5/08/25	EB	Review and respond to P. Tomasco regarding notice of filing of Midas reply (0.1); review same (0.1).	.20	1250.00	250.00
5/09/25	EB	Correspond with BA and JS regarding status and high priority action items (0.2); attend teleconference with BA and JS regarding GMO request for declaration (0.2); correspond with [redacted] regarding protective order compliance and related vendor and document issues (0.2).	.40	1250.00	500.00
5/09/25	NC	Prepare notice of filing for EB (0.8); prepare exhibits for same for EB (0.6).	1.40	350.00	490.00
5/09/25	ASA	Assist NC with preparation of notice of order.	.20	350.00	70.00
5/20/25	EB	Communicate with P. Tomasco regarding and begin preparing for hearing on Midas claim.	.50	1250.00	625.00
5/21/25	EB	Correspond with R. Harrington regarding hearing on objection to Midas proof of claim.	.10	1250.00	125.00
5/27/25	EB	Begin preparing for hearing and [redacted] on Midas proof of claim in consultation with BA, JS, and R. Harrington.	.50	1250.00	625.00
5/27/25	BA	Confer with EB regarding [redacted] to Midas claim and correspond with EB and Quinn team regarding same.	.20	1200.00	240.00
5/28/25	EB	Prepare and coordinate contact with clerk and opposing counsel regarding hearing request (0.2); update client regarding status and next steps (0.1); coordinate filing of notice of hearing with CS (0.2); assess potential further briefing in advance of hearing and correspond with co-counsel regarding same (1.0).	1.50	1250.00	1,875.00
5/28/25	BA	Correspond with EB and team regarding outreach to court on Midas Green hearing.	.20	1200.00	240.00
5/28/25	CS	Review, finalize and file notice of hearing.	.30	850.00	255.00
5/29/25	EB	Correspond with R. Harrington regarding next steps to prepare for upcoming hearing.	.10	1250.00	125.00

Stris & Maher LLP

Invoice # 14587 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/30/25	EB	Continue working on next steps in support of opposition to Midas Green claim in consultation with co-counsel (0.5); update BA and JS regarding same (0.1).	.60	1250.00	750.00
		TOTAL PROFESSIONAL SERVICES			**$ 6,170.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	3.90	1,250.00	4,875.00
Bridget Asay	BA	Partner	.40	1,200.00	480.00
Colleen Smith	CS	Associate	.30	850.00	255.00
Andrew Atsalis	ASA	Fellow	.20	350.00	70.00
Nicholas Capalbo	NC	Fellow	1.40	350.00	490.00
Total			**6.20**		**$ 6,170.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
5/16/25		JND Discovery Invoice for April 2025.	3,765.00
		TOTAL EXPENSES ADVANCED	**$ 3,765.00**
		TOTAL THIS INVOICE	**$ 9,935.00**

Stris & Maher LLP

Invoice # 14587 June 10, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14530	4/23/25	28,410.00	25,071.00	3,339.00
14560	5/14/25	10,567.50	.00	10,567.50

Previous Balance	$ 13,906.50
Balance Due This Invoice	$ 9,935.00
TOTAL BALANCE DUE	**$ 23,841.50**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 10,567.50	$ 3,339.00	$ .00	$ .00	$ .00	$ 13,906.50

Stris

June 10, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14575
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through May 31, 2025

RE: Whinstone Litigation

Total Professional Services	$ 159,317.50
Total Expenses Advanced	$ 3,629.36
TOTAL THIS INVOICE	**$ 162,946.86**
Previous Balance	$ 154,360.50
TOTAL BALANCE DUE	**$ 317,307.36**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Invoice # 14575 June 10, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
5/01/25	EB	Attention to high priority action items including protective order compliance.	.50	1250.00	625.00
5/01/25	MV	Discuss Logikcull download data options with chief technology officer, correspondence regarding the same (0.2); review protective order regarding destruction of documents after dismissal, correspondence regarding next steps for data destruction and download of client data (0.5).	.70	425.00	297.50
5/02/25	EB	Review draft and correspond with BA and JS regarding [redacted] declaration (0.2); further revise same (0.3); prepare for (0.2) and attend (0.7) teleconference with BA and [redacted] regarding declaration and protective order compliance; correspond with MV regarding next steps in support of protective order compliance (0.1).	1.50	1250.00	1,875.00
5/02/25	BA	Confer with EB and [redacted] to discuss and revise declaration (0.7); review revised declaration and correspond with EB and JS regarding same ().1).	.80	1200.00	960.00
5/02/25	JS	Work on declaration of [redacted] in connection with LKC revised retention application.	.40	1025.00	410.00
5/05/25	EB	Correspond with BA, JS, co-counsel and clients regarding status and action items including additional dismissal papers and compliance with settlement agreement provisions (0.4); evaluate further potential revisions to [redacted] declaration (0.2).	.60	1250.00	750.00
5/05/25	BA	Review comments from [redacted] regarding declaration, correspond with EB and JS regarding same, and review settlement agreements as requested by [redacted] in connection with declaration (0.4); correspond with EB and JS regarding arbitration dismissal and review docket for arbitration (0.2).	.60	1200.00	720.00
5/05/25	JHA	Prepare memorandum with links to important documents for attorney use.	2.00	350.00	700.00

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/06/25	EB	Review related correspondence, revise [redacted] declaration, and correspond with BA, JS, and [redacted] regarding next steps in support of same (0.4); correspond with BA, JS, ASA, and co-counsel regarding updates and action items including filing of arbitration dismissal request and client updates (0.2); correspond with BA, KH, VO, ASA, client, and counsel for [redacted] regarding response to transcript request (0.3).	.90	1250.00	1,125.00
5/06/25	BA	Correspond with AA, EB and team regarding AAA docket and efile, review final stipulation of dismissal and efile same (0.3); correspond JS, and with EB and JS regarding LKC fee dispute (0.2); confer with EB and correspond with EB and team regarding request from [redacted] for deposition transcript, and research same (0.3).	.80	1200.00	960.00
5/06/25	JHA	Prepare memorandum with links to important documents for attorney use.	3.00	350.00	1,050.00
5/06/25	ASA	Correspond with EB, BA, and A. Swartz (Lehotsky Keller Cohn) regarding filing of joint motion to dismiss arbitration (0.3); file and organize closing American Arbitration Association documentation at request of BA (0.5).	.80	350.00	280.00
5/07/25	EB	Review correspondence regarding final revisions to [redacted] declaration (0.1); work on protective order compliance requirements and related vendor and document issues (0.2).	.30	1250.00	375.00
5/07/25	JS	Work on finalization of [redacted] declaration in support of LKC amended retention application (0.8); evaluate Debtor arguments in support of LKC amended retention application (0.5).	1.30	1025.00	1,332.50
5/07/25	JHA	Detailed tracking of docket updates for bankruptcy proceeding.	.60	350.00	210.00

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/08/25	EB	Continue assessing requirements and working on protective order compliance (1.1); correspond with PB and MV regarding same (0.1); review and respond to correspondence with BA and JS regarding high priority action items including client update regarding SAFE objections (0.1).	1.30	1250.00	1,625.00
5/08/25	BA	Confer with JS regarding reply in support of application to amend LKC retention (0.3); begin researching and drafting reply memorandum in support of Debtors' application to amend LKC retention and correspond with JS regarding strategy for same (2.1); correspond with EB, JS, PB and [redacted] regarding status and high priority action items (0.5).	2.90	1200.00	3,480.00
5/08/25	JHA	Continue preparing memorandum with links to important documents for attorney use.	.50	350.00	175.00
5/08/25	SD	Research docket and pull documents related to Lehotsky Keller Cohen's retention dispute (1.6); begin preparing Rhodium's response to SAFE's objection to the Lehotsky Keller Cohen retention for BA (0.9).	2.50	350.00	875.00
5/09/25	EB	Attend teleconference with BA and JS regarding GMO request for declaration (0.2); attend to and correspond with [redacted] regarding protective order compliance and related vendor and document issues (0.4).	.60	1250.00	750.00
5/09/25	BA	Correspond with EB regarding status and high priority action items including recent filings (0.2); confer with EB and JS regarding high priority action items including GMO request for business records (0.2).	.40	1200.00	480.00
5/09/25	JS	Confer with EB and BA regarding GMO subpoena (0.2).	.20	1025.00	205.00
5/09/25	JHA	Continue preparing memorandum with links to important documents for attorney use.	2.00	350.00	700.00
5/09/25	SD	Work on debtors' reply to objection of the ad hoc group of SAFE parties for BA.	1.60	350.00	560.00
5/10/25	EB	Review and respond to correspondence from BA and JS regarding client teleconference.	.10	1250.00	125.00
5/10/25	BA	Continue researching and drafting reply in support of Debtors' application to amend LKC retention (3.3).	3.30	1200.00	3,960.00

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/11/25	BA	Continue researching and drafting reply in support of Debtors' application to amend LKC retention and correspond with JS regarding same.	1.00	1200.00	1,200.00
5/12/25	EB	Attend portion of teleconference with BA, [redacted] and [redacted] regarding action items including protective order compliance and related document issues (0.6); correspond with MV regarding database backup process and client request (0.2); correspond with P. Tomasco, R. Izakelian, clients, and Stris team regarding same (0.1).	.90	1250.00	1,125.00
5/12/25	BA	Confer with [redacted] and E. Brannen regarding matters related to protective order and data preservation needs (0.5); confer with [redacted] regarding issues related to LKC retention dispute (0.1); confer with [redacted] and P. Tomasco regarding protective order/data preservation and Stris retention matter (0.3); (0.8); correspond with SD regarding review of transcript of prior status conference regarding LKC retention (0.2); correspond with W. Thompson regarding deadline for filings related to LKC retention dispute (0.1); correspond and confer with JS regarding LKC retention dispute and briefing on same (0.1); continue researching and drafting reply in support of updated LKC retention (1.7).	3.00	1200.00	3,600.00
5/12/25	JS	Review BA draft of reply regarding LKC retention application.	.50	1025.00	512.50
5/12/25	JHA	Continue preparing memorandum with links to important documents for attorney use.	2.20	350.00	770.00
5/12/25	SD	Evaluate transcripts and trancribed audio recordings to confirm information for BA regarding LCK retention.	1.40	350.00	490.00
5/12/25	MV	Review correspondence regarding transfer of client data (0.1); evaluate steps for transfer of data and correspond with vendor regarding same (0.2).	.30	425.00	127.50
5/13/25	EB	Review and correspond with BA and JS regarding action items including further revisions to Debtors' draft reply submission in support of LKC amended fee application (0.4); correspond with R. Izakelian regarding protective order compliance and related document issues and procedures (0.1).	.50	1250.00	625.00

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/13/25	BA	Review and revise draft reply in support of LKC retention and convey same to [redacted] for review, and review comments and suggestions from [redacted] on same (0.6); review question from LKC's counsel regarding [redacted] issues and correspond with JS regarding same (0.2) and confer with JS regarding same (0.2).	1.00	1200.00	1,200.00
5/13/25	JS	Attend teleconference with BA regarding LKC retention application (0.2).	.20	1025.00	205.00
5/13/25	CHH	Assist MV with pull of Logikcull data for clients.	.10	350.00	35.00
5/13/25	PB	Correspond with EB and MV to provide information in support of client data request.	.40	850.00	340.00
5/13/25	MV	Work on exporting of client data from Logikcull including corresponding with vendor and creating searches and initial downlod of files (4.7); update EB regarding estimate of project scope (0.3).	5.00	425.00	2,125.00
5/14/25	EB	Correspond with Stris team regarding status and high priority action items (0.5); advise MV regarding information in support of file backup request from client and co-counsel (0.1).	.60	1250.00	750.00
5/14/25	BA	Research [redacted] issues as relevant to LKC retention, correspond with JS and EB regarding same, and confer with JS regarding same.	.30	1200.00	360.00
5/14/25	JS	Evaluate [redacted] issues and confer with BA regarding same (0.4) and prepare [redacted] declaration (1.5).	1.90	1025.00	1,947.50
5/14/25	CHH	Review and respond to attorney correspondence.	.10	350.00	35.00
5/14/25	MV	Continue working on exporting of client data including correspondence with vendor regarding redacted and native unredacted files, running test export, and discussing same with QH.	1.50	425.00	637.50
5/15/25	EB	Assess and review and respond to correspondence with BA, JS, co-counsel and client regarding response to inquiry concerning [redacted].	.50	1250.00	625.00

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/15/25	BA	Review client request regarding [redacted] and correspond with EB regarding same (0.1); continue drafting reply in support of LKC retention, correspond with JS and EB regarding same, and revise draft to incorporate client comments and convey revisions to JS and EB (1.2).	1.30	1200.00	1,560.00
5/15/25	JS	Work on Debtors' reply in support of LKC updated retention.	2.50	1025.00	2,562.50
5/15/25	SD	Cite check and assist BA with finalization of Debtors' reply to SAFE Group's objection to Lehotsky Keller Cohen amended retention agreement.	3.50	350.00	1,225.00
5/16/25	EB	Communicate with J. Cohn regarding status and action items in advance of hearing on LKC updated fee application (0.1); review, revise, and correspond with BA, JS, and CS regarding revisions to draft reply in support of same and [redacted] declaration (1.7); review and correspond with BA, JS, P. Tomasco, and R. Izakelian regarding action items including opposition to SAFE motion to compel and motion for protective order (0.7); review related correspondence and confer with BA and JS regarding deposition request (0.2).	2.70	1250.00	3,375.00
5/16/25	BA	Convey new discovery subpoenas from SAFE AHG to P. Tomasco and [redacted] (0.1); review draft motion for a protective order prepared by Quinn and convey comments on same (0.3); review final draft of reply memorandum in support of LKC retention and correspond with SD and CS as needed to assist in finalizing same and confirm filing of same, and correspond with [redacted] regarding same (0.8); review correspondence from AHG regarding request for deposition and confer with JS and EB regarding same (0.2); confer with SD regarding preparation of exhibit and witness list, correspond with JS regarding potential witness, and convey initial draft of same to JS (0.4).	1.80	1200.00	2,160.00
5/16/25	CHH	Precisely track and organize documents and deadlines for attorney use.	.20	350.00	70.00
5/16/25	SD	Continue assisting BA with revisions to Debtors' reply regarding Lehotsky Keller Cohn retention (1.4); research regarding witness and exhibit lists and begin drafting Debtors' witness and exhibit list for Lehotsky Keller Cohn retention hearing (1.6).	3.00	350.00	1,050.00

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Date	Tkpr	Description	Hours	Rate	Amount
5/16/25	MV	Correspond with CHH regarding action items in support of client data export including additional production in separate workspace.	.20	425.00	85.00
5/17/25	EB	Review correspondence from counsel for SAFE AHG (0.1); correspond with BA and JS regarding revisions to response to same (0.2).	.30	1250.00	375.00
5/17/25	BA	Correspond with JS and EB regarding responses to SAFE AHG.	.20	1200.00	240.00
5/17/25	JS	Review and evaluate next steps in light of SAFE AHG notice of deposition of C. Topping and correspond with SAFE AHG regarding same.	3.10	1025.00	3,177.50
5/18/25	EB	Correspond with BA and JS regarding revisions to further correspondence with counsel for SAFE AHG regarding upcoming hearing and strategy for same.	.70	1250.00	875.00
5/18/25	BA	Review ongoing correspondence with SAFE AHG's regarding upcoming hearing and correspond with JS and EB regarding [redacted] and for hearing (0.5); draft exhibit and witness list and convey same to JS and EB for review, and correspond with CS regarding upcoming filing (0.6).	1.10	1200.00	1,320.00
5/18/25	JS	Further review and evaluate next steps in light of SAFE AHG notice of deposition of C. Topping and correspond with SAFE AHG regarding same.	4.00	1025.00	4,100.00
5/19/25	EB	Attend teleconference with BA, JS, and counsel for LKC regarding discussions with counsel for SAFE AHG regarding challenge to C. Topping declaration (0.5); attention to negotiations and communications addressing same (1.3); review and correspond with BA regarding revisions to exhibit and witness lists (0.2); correspond with BA and JS regarding protective order compliance and [redacted] (0.1); begin preparing for C. Topping deposition preparation (1.0).	3.10	1250.00	3,875.00

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/19/25	BA	Participate in teleconference with JS, EB, and LKC's counsel to discuss potential continuance of hearing, prep for same, and planned conferral with SAFE AHG (.5); correspond with JS, EB, SD, and CS as needed for final revisions to and finalization of exhibit and witness list, and review and approve same for filing (0.5); draft motion for continuance and/or acceptance of Topping declaration and correspond with SD and JH as needed for assistance with formatting and revisions to same (1.2); review correspondence with SAFE AHG in attempt to negotiate continuance and correspond and confer with JS regarding strategy for and responses to same (0.6); correspond with EB regarding [redacted] issues (0.1); correspond with CS and JS regarding joint motion for continuance, and with Quinn team regarding procedure for same (0.1).	3.00	1200.00	3,600.00
5/19/25	JS	Work on SAFE AHG challenge to C. Topping declaration, including correspondence and calls with opposing counsel, client coordination regarding continuance, and preparation of motion for continuance in light of AHG's unreasonable positions.	7.70	1025.00	7,892.50
5/19/25	CS	Draft stipulation to continue hearing on updated application to employ LKC; draft updated notice of hearing; review docket entries and email communications in preparation for drafting the same; review, finalize and file witness and exhibit list.	1.80	850.00	1,530.00
5/19/25	JHA	Collect materials including emergency motions at BA request (1.0); assist with preparing draft emergency motion (0.5); provide requested additional information to BA including regarding Texas Southern District [redacted] and procedures (0.6).	2.10	350.00	735.00
5/19/25	SD	Continue preparing exhibits to accompany Debtors' witness list (1.3); assist BA and JS with potential motion seeking continuance (1.2).	2.50	350.00	875.00
5/20/25	VO	Confer with BA, EB, and JS regarding strategy for upcoming hearing on AHG discovery disputes and strategy for upcoming deposition and hearing related to LKC retention dispute.	.50	1025.00	512.50

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/20/25	EB	Advise NC regarding revisions to notice of rescheduled hearing and correspond with BA, JS, CS, NC, co-counsel and opposing parties regarding same (0.2); correspond with counsel for Whinstone regarding document issues (0.1); review and analyze SAFE AHG correspondence and reply briefing on motion to compel Imperium and Debtors and communicate with BA and JS regarding same (0.4); continue preparing for C. Topping deposition preparation (1.5); confer with BA, VO (portion), and JS regarding [redacted] for same and upcoming hearing on AHG discovery disputes and hearing related to LKC retention dispute (0.8).	3.00	1250.00	3,750.00
5/20/25	BA	Confer with JS, EB, and VO (portion) regarding [redacted] for upcoming hearing on AHG discovery disputes and [redacted] for upcoming deposition and hearing related to LKC retention dispute (0.8); review filings related to AHG discovery disputes and objection to AHG claim (0.3); correspond with EB and JS regarding outreach from M. Fox regarding LKC dispute (0.1); correspond with JS and JH action items in support of upcoming hearing and ensuring [redacted] properly requested (0.1); review draft joint request for continuance, review court order granting continuance, review draft notice of hearing, correspond with Quinn team to review same, and assist EB and team with finalizing same (0.2).	1.50	1200.00	1,800.00
5/20/25	CS	Review, finalize and file updated notice of hearing on updated application to employ LKC; email communications regarding the same.	.50	850.00	425.00
5/20/25	CHH	Precisely track and organize documents for attorney use (0.2); precisely track and calendar deadlines for attorney use (0.1).	.30	350.00	105.00
5/20/25	NC	Revise notice of rescheduling of hearing on LKC fee application	.60	350.00	210.00
5/20/25	JHA	Assist BA and JS with preparation for motion to compel hearing and filing privileges.	1.00	350.00	350.00
5/20/25	MV	Continue working on export of unredacted client documents.	.10	425.00	42.50
5/21/25	EB	Continue preparing for deposition preparation of C. Topping pertaining to LKC application for updated fee motion (4.9); analyze interim implications for same from hearing on SAFE and Rhodium discovery motions in consultation with JS (0.2).	5.10	1250.00	6,375.00

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/21/25	BA	Attend motion hearing to monitor with respect to matters relating to Stris, to LKC retention, and to documents produced related to Whinstone litigation, and confer with JS regarding same.	2.00	1200.00	2,400.00
5/21/25	JS	Prepare for and attend hearing on motion to compel filed by SAFE AHG in light of potential connection to LKC retention application (1.8); evaluate next steps in connection with deposition of C. Topping and hearing on LKC retention application in light of same (1.0).	2.80	1025.00	2,870.00
5/21/25	JHA	Attention to attorney requests regarding documents and updates to filing status (0.8); correspond with Houston bankryptcy court regarding filing status for JS (0.2).	1.00	350.00	350.00
5/22/25	EB	Continue preparing for C. Topping deposition (3.5); review portions of rough transcript of [redacted] in support of same (1.2).	4.70	1250.00	5,875.00
5/22/25	BA	Provide research and analysis to EB in preparation for deposition preparation of C. Topping.	.40	1200.00	480.00
5/22/25	JS	Work on preparation for deposition of C. Topping.	.80	1025.00	820.00
5/22/25	QH	Assist with export and download of multiple-part zipped files for requested [redacted].	.50	350.00	175.00
5/22/25	MV	Continue working on export and back up of client documents including correspondence with EB and vendor regarding metadata and potential de-duplification and review of search fields for export.	2.50	425.00	1,062.50
5/23/25	EB	Continue preparing for C. Topping deposition preparation (3.0); attend teleconference with [redacted] regarding same (0.2); correspond with BA, VO, JS, and ASA regarding action items in support of same and resulting from discovery hearing (0.1); begin working on production of certain pre-petition invoices (0.5); correspond with R. Izakelian regarding same (0.1).	3.90	1250.00	4,875.00
5/23/25	BA	Review discovery requests from LKC related to LKC dispute; correspond with EB and review correspondence from AHG regarding Topping deposition parameters.	.20	1200.00	240.00

Stris & Maher LLP

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/23/25	ASA	Analyze recent filings related to Debtors' application for an updated order authorizing the retention and employment of Lehotsky Keller Cohn LLP at request of EB, review full docket for related filings, and prepare all relevant briefing and supporting material to assist EB with preparation of C. Topping for upcoming deposition.	2.20	350.00	770.00
5/23/25	MV	Review download of zip files containing client data to check file format and functionality of load files.	.20	425.00	85.00
5/24/25	EB	Review and communicate with BA, JS, co-counsel, and [redacted] regarding inquiry concerning Whinstone [redacted] invoice.	.30	1250.00	375.00
5/24/25	BA	Review Whinstone invoices forwarded by [redacted], research same, and correspond with EB and team regarding potential response to same.	.40	1200.00	480.00
5/25/25	EB	Review and respond to correspondence from BA and co-counsel regarding inquiry concerning Whinstone [redacted] invoice.	.10	1250.00	125.00
5/25/25	BA	Research background on payment of [redacted] charges, draft proposed response to Whinstone objecting to [redacted], and convey analysis and proposed draft to client, litigation team, and Quinn team for review.	.60	1200.00	720.00
5/26/25	BA	Correspond with client, EB, and P. Tomasco regarding mistaken Whinstone invoice for [redacted].	.10	1200.00	120.00
5/27/25	EB	Continue preparing for and assisting C. Topping with preparation for deposition (4.8); confer with BA regarding issues and analysis in support of same (0.4); communicate with BA, JS, and [redacted] regarding hearing scheduled for June 4 (0.1); continue attending to invoices for production in consultation with R. Izakelian, BA, and JS (0.7); confer with BA and JS regarding potential [redacted], hearing, and deposition preparation (0.5).	6.50	1250.00	8,125.00

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/27/25	BA	Monitor court hearing as potentially relevant to LKC dispute and update EB and JS regarding same (0.2); analyze issues and confer with EB to assist with deposition preparation for C. Topping (0.4); correspond with EB and JS regarding potential [redacted] for LKC dispute and confer with JS and EB regarding issues related to same (0.5); correspond with EB and JS regarding redaction of LKC and Stris invoices for production (0.1); confer with EB and JS regarding potential [redacted], hearing, and deposition preparation (0.5).	1.70	1200.00	2,040.00
5/27/25	JS	Prepare for and attend portion of deposition preparation session with C. Topping and EB (1.4); prepare for hearing on LKC retention application (1.5).	3.90	1025.00	3,997.50
5/28/25	EB	Continue preparing for C. Topping deposition (4.0); communicate with [redacted], BA, and JS regarding preparation for same and related hearing (0.2).	4.20	1250.00	5,250.00
5/28/25	BA	Assist with matters for preparation for C. Topping deposition, including corresponding with EB and JS regarding issues for same, and regarding invoice production.	.60	1200.00	720.00
5/28/25	JHA	Detailed tracking of docket updates for bankruptcy proceeding.	1.00	350.00	350.00
5/28/25	MV	Continue working on export of client data including creation of additional downloads containing unredacted and redacted data.	1.50	425.00	637.50
5/29/25	EB	Continue preparing for C. Topping deposition.	5.90	1250.00	7,375.00
5/29/25	BA	Confer with EB to assist in preparing for deposition of C. Topping and meet with EB and [redacted] regarding same.	3.00	1200.00	3,600.00
5/29/25	JS	Prepare for hearing on LKC retention application.	2.00	1025.00	2,050.00
5/29/25	ASA	Conduct research at request of EB in preparation for upcoming deposition of C. Topping on June 3, 2025.	.50	350.00	175.00
5/30/25	EB	Continue preparing for deposition of C. Topping (4.0); communicate with T. Schmeltz and P. Lohse regarding same (0.2).	4.20	1250.00	5,250.00
5/30/25	JS	Attend portion of deposition preparation session with [redacted] and EB (1.5); prepare for hearing on LKC retention application (0.8).	2.30	1025.00	2,357.50

Invoice # 14575 June 10, 2025

TOTAL PROFESSIONAL SERVICES $ 159,317.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	53.00	1,250.00	66,250.00
Bridget Asay	BA	Partner	32.00	1,200.00	38,400.00
Victor O'Connell	VO	Partner	.50	1,025.00	512.50
John Stokes	JS	Partner	33.60	1,025.00	34,440.00
Colleen Smith	CS	Associate	2.30	850.00	1,955.00
Peter Brody	PB	Associate	.40	850.00	340.00
Monica Viramontes	MV	Sr Paralegal	12.00	425.00	5,100.00
Quoc Hoang	QH	Legal Technology Spe	.50	350.00	175.00
Andrew Atsalis	ASA	Fellow	3.50	350.00	1,225.00
Cynthia Huang	CHH	Fellow	.70	350.00	245.00
Sebastian Delgado	SD	Fellow	14.50	350.00	5,075.00
Nicholas Capalbo	NC	Fellow	.60	350.00	210.00
Jaida Hodge-Adams	JHA	Fellow	15.40	350.00	5,390.00
Total			**169.00**		**$ 159,317.50**

EXPENSES ADVANCED

Date	Task	Description	Amount
5/01/25		Logikcull Discovery Solutions (May 2025).	2,646.00
5/22/25		Purchase of (4) hard drives for data backup.	983.36

TOTAL EXPENSES ADVANCED $ 3,629.36

TOTAL THIS INVOICE $ 162,946.86

Invoice # 14575 June 10, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14517	4/23/25	503,457.91	404,817.41	98,640.50
14547	5/14/25	55,720.00	.00	55,720.00

Previous Balance	$ 154,360.50
Balance Due This Invoice	$ 162,946.86
TOTAL BALANCE DUE	**$ 317,307.36**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 55,720.00	$ 98,640.50	$ .00	$ .00	$ .00	$ 154,360.50

Stris

June 10, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14588
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through May 31, 2025

RE: Retention and Fee Applications

Total Professional Services	$ 14,110.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 14,110.00**
Previous Balance	$ 22,513.00
TOTAL BALANCE DUE	**$ 36,623.00**

Electronic Invoice

Invoice # 14588 June 10, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
5/07/25	EB	Advise NC regarding preparation of portions of monthly fee statement.	.20	1250.00	250.00
5/07/25	NC	Assist EB with preparation of fee statements.	.80	350.00	280.00
5/09/25	EB	Review and revise reply in support of updated retention application to address SAFE objection (0.5); correspond with BA and JS regarding same (0.1).	.60	1250.00	750.00
5/09/25	BA	Confer with EB and JS regarding Ad Hoc Group's objection to updated Stris retention (0.3); draft reply in support of updated Stris retention, convey same to JS and EB for review, and review edits from JS to same (1.0).	1.30	1200.00	1,560.00
5/09/25	JS	Work on Stris reply regarding Stris retention application.	1.50	1025.00	1,537.50
5/10/25	BA	Review comments from P. Tomasco and [redacted] on draft reply in support of updated Stris retention, research and further revise same, and convey revised draft to JS and EB for review.	1.80	1200.00	2,160.00
5/10/25	JS	Work on Stris reply regarding Stris retention application.	1.50	1025.00	1,537.50
5/12/25	VO	Prepare certificate of no objection and emails with B. Howell regarding same.	.20	1025.00	205.00
5/12/25	EB	Review and correspond with BA and JS regarding action items including revisions to updated draft reply in support of amended engagement order.	.40	1250.00	500.00
5/12/25	BA	Revise reply in support of Stris retention, convey same to JS, P. Tomasco, and [redacted] for review, further revise and finalize same and correspond with CS for filing (0.8); correspond with JS, B. Howell, and P. Tomasco regarding status conference on Stris retention and notice of hearing for same, and correspond with JS regarding status conference (0.2).	1.00	1200.00	1,200.00
5/12/25	JS	Work on reply regarding Stris retention application.	1.50	1025.00	1,537.50
5/12/25	CS	File Reply to Ad Hoc Group of Safe Parties Objection to Debtor's Application for an Updated Order Authorizing the Retention and Employment of Stris & Maher LLP as Special Litigation Counsel.	.30	850.00	255.00

Invoice # 14588 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/13/25	EB	Prepare portions of monthly fee statement.	.70	1250.00	875.00
5/13/25	BA	Attend by teleconference status conference on Stris retention.	.10	1200.00	120.00
5/20/25	EB	Continue working on portions of monthly fee statement.	.50	1250.00	625.00
5/21/25	VO	Prepare April monthly fee application (0.5); emails with B. Howell and client regarding same (0.2).	.70	1025.00	717.50

TOTAL PROFESSIONAL SERVICES **$ 14,110.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	2.40	1,250.00	3,000.00
Bridget Asay	BA	Partner	4.20	1,200.00	5,040.00
Victor O'Connell	VO	Partner	.90	1,025.00	922.50
John Stokes	JS	Partner	4.50	1,025.00	4,612.50
Colleen Smith	CS	Associate	.30	850.00	255.00
Nicholas Capalbo	NC	Fellow	.80	350.00	280.00
Total			**13.10**		**$ 14,110.00**

TOTAL THIS INVOICE **$ 14,110.00**

Stris & Maher LLP

Invoice # 14588 June 10, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14532	4/23/25	11,102.50	8,882.00	2,220.50
14561	5/14/25	20,292.50	.00	20,292.50

Previous Balance	$ 22,513.00
Balance Due This Invoice	$ 14,110.00
TOTAL BALANCE DUE	**$ 36,623.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 20,292.50	$ 2,220.50	$ .00	$ .00	$ .00	$ 22,513.00

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 NINTH MONTHLY FEE STATEMENT
FOR THE PERIOD JUNE 1, 2025, THROUGH JUNE 30, 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 June 1, 2025, through June 30, 2025 (the "Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $181,376.00 (80% of the services rendered), plus $11,305.52 (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.

[1] 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 (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 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;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (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 (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 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 (ha.nguyen@usdoj.gov), 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 17th day of July, 2025.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
Patricia B. Tomasco (SBN 01797600)
Joanna D. Caytas (SBN 24127230)
Cameron Kelly (SBN 24120936)
Alain Jaquet (*pro hac vice)*
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Razmig Izakelian (pro hac vice)
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Email: razmigizakelian@quinnemanuel.com

-and-

STRIS & MAHER LLP

Peter K. Stris (pro hac vice)
Victor O'Connell (pro hac vice)
John Stokes (pro hac vice)
Peter Brody (pro hac vice)
Helen Marsh (pro hac vice)

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-and-

LEHOTSKY KELLER COHN LLP

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Todd Disher (pro hac vice)
Alexis Swartz (pro hac vice)
will@lkcfirm.com
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alexis@lkcfirm.com
408 W. 11th Street, 5th Floor
Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on July 17, 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

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	72.1	$78,860.00	$63,088.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	141.9	$133,992.50	$107,194.00
007	Retention and Fee Applications	6.7	$7,227.50	$5,782.00
008	Non-working Travel	7.4	$6,640.00	$5,312.00
Total			$226,720.00	$181,376.00

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	13.90	$17,375.00
Tillman Breckenridge	Partner	2003	1,200.00	11.40	$13,680.00
Ken Halpern	Partner	1997	1,100.00	41.90	$46,090.00
Andrew Atsalis	Litigation Fellow	N/A	350.00	4.90	$1,715.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	34.20	$42,750.00
Bridget Asay	Partner	1997	1,200.00	26.20	$31,440.00
John Stokes	Partner	2016	1,025.00	43.40	$44,485.00
Peter Brody	Associate	2016	850.00	.30	$255.00
Colleen Smith	Associate	2015	850.00	.50	$425.00
Rachel Fleischer	Staff Attorney	2021	525.00	2.40	$1,260.00
Monica Viramontes	Senior Paralegal	N/A	425.00	15.50	$6,587.50
Quoc Hoang	Legal Tech Specialist	N/A	350.00	3.00	$1,050.00
Andrew Atsalis	Litigation Fellow	N/A	350.00	2.30	$805.00
Sebastian Delgado	Litigation Fellow	N/A	350.00	11.70	$4,095.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	2.40	$840.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	3.70	$4,625.00
Victor O'Connell	Partner	2012	1,025.00	.60	$615.00
John Stokes	Partner	2016	1,025.00	1.70	$1,742.50
Nicholas Capalbo	Litigation Fellow	N/A	350.00	.70	$245.00

Non-Working Travel[2]

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
John Stokes	Partner	2016	1,025.00	6.00	$6,150.00
Sebastian Delgado	Litigation Fellow	N/A	350.00	1.40	$490.00
Total after 50% discount					

[2] Stris & Maher has billed its time for travel during which no work was performed on a separate invoice at a 50% discount.

EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
E-discovery platform fees	$3,765.00
Travel	$1,052.36
Total	$4,817.36

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
E-discovery platform fees	$2,646.00
Travel	$1,851.47
Court transcription services	$1,990.69
Total	$6,488.16

EXHIBIT 4

Stris

July 16, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14614
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through June 30, 2025

RE: Midas Green Litigation

Total Professional Services	$ 78,860.00
Total Expenses Advanced	$ 4,817.36
TOTAL THIS INVOICE	**$ 83,677.36**
Previous Balance	$ 5,180.50
TOTAL BALANCE DUE	**$ 88,857.86**

Electronic Invoice

Stris & Maher LLP

Invoice # 14614 July 16, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
6/02/25	EB	Work on reply in advance of hearing on objection to Midas Green claim.	.50	1250.00	625.00
6/03/25	EB	Advise TB regarding action items in support of reply brief (0.2); review and update client and co-counsel regarding correspondence from counsel for Midas (0.1).	.30	1250.00	375.00
6/03/25	TB	Review and analyze documents in support of further filing on objection to Midas claim (0.3) confer with EB regarding same (0.2).	.50	1200.00	600.00
6/04/25	EB	Correspond with counsel for Midas Green (0.1); review and respond to correspondence from R. Harrington (0.1).	.20	1250.00	250.00
6/05/25	EB	Attend teleconference with counsel for Midas Green (0.2); update client and co-counsel regarding same (0.1); correspond with Stris team regarding status and upcoming action items (0.1).	.40	1250.00	500.00
6/09/25	EB	Continue working on [redacted] brief and hearing preparation (0.3); attend teleconference with KH regarding same (0.3); correspond with R. Harrington and update TB and KH regarding status and brief (0.1).	.70	1250.00	875.00
6/09/25	KJH	Teleconference with EB regarding opposition brief to proof of claim and hearing prep on that claim.	.30	1100.00	330.00
6/09/25	TB	Analyze materials to assist with reply brief and hearing preparation.	.90	1200.00	1,080.00
6/10/25	EB	Update [redacted] regarding status and action items in support of upcoming hearing.	.10	1250.00	125.00
6/10/25	TB	Continue analyzing materials including summary judgment transcript to assist EB with hearing preparation and further briefing.	.50	1200.00	600.00
6/10/25	ASA	Prepare materials for EB, TB, and KH in support of further briefing and preparation for hearing.	.80	350.00	280.00
6/11/25	EB	Prepare status summary as requested by [redacted].	.80	1250.00	1,000.00
6/14/25	TB	Continue analyzing district court materials to assist EB and KH with further briefing and EB with hearing preparation.	1.40	1200.00	1,680.00

Stris & Maher LLP

Invoice # 14614 July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/15/25	TB	Continue analyzing Midas-related bankruptcy court materials to assist EB and KH with further briefing and EB with hearing preparation.	3.60	1200.00	4,320.00
6/16/25	EB	Correspond with R. Harrington regarding status and action items in support of reply brief.	.10	1250.00	125.00
6/16/25	KJH	Review and analyze bankruptcy court filings and record on motion for summary judgment of noninfringement in preparation for reply and hearing on objection to claim in bankruptcy court.	3.20	1100.00	3,520.00
6/16/25	TB	Continue assisting with preparation for July 8 hearing.	.50	1200.00	600.00
6/17/25	EB	Continue preparing for hearing on objections to Midas claims.	1.00	1250.00	1,250.00
6/17/25	KJH	Conduct additional research on [redacted] of district court's oral order granting summary judgment [redacted] in preparation for reply and bankruptcy court hearing on objection to claim.	3.80	1100.00	4,180.00
6/18/25	KJH	Teleconference with EB regarding status, research findings, and further tasks to prepare for hearing (0.3); further research record and law and draft analysis and talking points regarding [redacted] of district court's bench ruling [redacted] in support of further briefing and hearing preparation (3.2).	3.50	1100.00	3,850.00
6/19/25	KJH	Further research [redacted] of oral summary judgment ruling and factual record, and revise analysis in preparation for hearing on Midas's proof of claim.	5.20	1100.00	5,720.00
6/20/25	EB	Review correspondence from KH and Texas counsel in support of preparation for hearing on objection to Midas claim (0.1); continue analyzing materials in preparation for same including research updates and analysis from KH (1.0).	1.10	1250.00	1,375.00
6/20/25	KJH	Research and revise analysis of [redacted] of Western District's grant of summary judgment, research [redacted] of claim under [redacted], and correspond with EB regarding same (4.8); teleconference with E. Winston (Quinn) regarding same (0.2).	5.00	1100.00	5,500.00
6/21/25	EB	Correspond with KH regarding status and action items in support of hearing preparation.	.10	1250.00	125.00

Stris & Maher LLP

Invoice # 14614 July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/23/25	EB	Analyze and correspond with KH regarding next steps in support of objection to Midas claim.	.50	1250.00	625.00
6/23/25	KJH	Research law on [redacted] of patent claims in bankruptcy court in preparation for review of reply brief and for July 8 hearing (2); correspond with E. Brannen regarding [redacted] at summary judgment hearing regarding [redacted] its rulings (0.1).	2.10	1100.00	2,310.00
6/24/25	EB	Attend teleconference with R. Harrington regarding status and action items in support of reply brief (0.2); analyze and correspond with KH regarding same and potential further arguments in support of objections to Midas claim (3.5).	3.70	1250.00	4,625.00
6/24/25	KJH	In preparation for editing reply and for hearing on Midas' proof of claim, research [redacted] of patent claim in bankruptcy court, and teleconference with EB regarding same.	2.10	1100.00	2,310.00
6/25/25	EB	Correspond with KH regarding update and further research in support of additional arguments for opposition to Midas claim (0.2); continue analyzing same (1.0); correspond with R. Harrington and KH regarding next steps in support of draft reply (0.1); work on same (1.1).	2.40	1250.00	3,000.00
6/25/25	KJH	Review draft reply brief in opposition to Midas proof of claim and initial revisions from TB and correspond with EB regarding issues to be addressed in same.	.40	1100.00	440.00
6/25/25	TB	Review reply brief and prior briefing and edit reply brief on objection to Midas Green claim.	1.80	1200.00	2,160.00
6/26/25	EB	Advise PB and MV regarding preservation and maintenance of document database (0.1); correspond with TB, KH, and R. Harrington regarding further revisions to reply brief in support of objection to Midas claim and related [redacted] issues (0.4).	.50	1250.00	625.00

Invoice # 14614 July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/26/25	KJH	Teleconference with EB regarding revisions to reply brief in opposition to Midas proof of claim (0.2); teleconference with TB regarding reply brief tasks (0.1); teleconference with R. Harrington regarding reply brief in opposition to Midas proof of claim (0.3); correspond with EB and R. Harrington regarding US trustee's [redacted] (0.1); teleconference and correspond with VO regarding research into [redacted] for use in reply brief (0.1); teleconference and correspond with AA regarding research into [redacted] and [redacted] in patent case for use in reply brief (0.2); research [redacted] of claims [redacted] for drafting material for reply brief (1.4).	2.40	1100.00	2,640.00
6/26/25	TB	Propose further edits to revised reply brief on Midas Green objection.	2.20	1200.00	2,640.00
6/27/25	KJH	Revise draft reply in opposition to Midas's proof of claim.	3.10	1100.00	3,410.00
6/27/25	ASA	Analyze deposition transcripts, expert reports, and correspondence between counsel regarding [redacted] in support of KH and drafting of reply in opposition to Midas's proof of claim.	1.90	350.00	665.00
6/29/25	KJH	Revise draft reply in opposition to Midas proof of claim, research case law and factual record to support arguments in reply, and correspond with EB, TB and ASA regarding same.	6.80	1100.00	7,480.00
6/30/25	EB	Continue working on further opposition brief including analyzing revisions proposed by TB and KH and additional arguments for incorporation into same.	1.50	1250.00	1,875.00
6/30/25	KJH	Research law relating to [redacted] of claims purporting to cover post-bankruptcy petition conduct and [redacted] of claims [redacted].	3.70	1100.00	4,070.00
6/30/25	KJH	Teleconference with AA regarding statistics on Midas/Rhodium patent litigation and adjustments to reply in opposition to Midas proof of claim (0.2); teleconference with R. Harrington regarding revisions to reply in opposition to Midas proof of claim (0.1).	.30	1100.00	330.00

Invoice # 14614 July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/30/25	ASA	Revise draft reply in opposition to Midas's proof of claim at request of KH and circulate with EB and TB (0.2); analyze deposition transcripts to calculate cumulative time already spent taking depositions as a data point in support of draft reply in opposition to Midas's proof of claim (1.6); correspond with KH regarding further edits to draft reply in opposition to Midas's proof of claim (0.2); analyze and provide attorneys with statistical figures related to past document productions (0.2).	2.20	350.00	770.00
		TOTAL PROFESSIONAL SERVICES			**$ 78,860.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	13.90	1,250.00	17,375.00
Tillman Breckenridge	TB	Partner	11.40	1,200.00	13,680.00
Ken Halpern	KJH	Partner	41.90	1,100.00	46,090.00
Andrew Atsalis	ASA	Fellow	4.90	350.00	1,715.00
Total			**72.10**		**$ 78,860.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
5/31/25		JND Discovery Invoice for May 2025.	3,765.00
6/03/25		EB airfare for hearing in Houston.	1,052.36
		TOTAL EXPENSES ADVANCED	**$ 4,817.36**
		TOTAL THIS INVOICE	**$ 83,677.36**

Stris & Maher LLP

Invoice # 14614 July 16, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14530	4/23/25	28,410.00	25,071.00	3,339.00
14560	5/14/25	10,567.50	9,960.00	607.50
14587	6/10/25	9,935.00	8,701.00	1,234.00

Previous Balance	$ 5,180.50
Balance Due This Invoice	$ 83,677.36
TOTAL BALANCE DUE	**$ 88,857.86**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 1,234.00	$ 3,946.50	$ .00	$ .00	$ 5,180.50

Stris

July 16, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14602
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through June 30, 2025

RE: Whinstone Litigation

Total Professional Services	$ 133,992.50
Total Expenses Advanced	$ 6,488.16
TOTAL THIS INVOICE	**$ 140,480.66**
Previous Balance	$ 141,648.00
TOTAL BALANCE DUE	**$ 282,128.66**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Stris & Maher LLP

Invoice # 14602 July 16, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
6/02/25	EB	Address correspondence and document requests from counsel for SAFE AHG in advance of C. Topping deposition (1.5); continue preparing for (2.7) and defend (3.0) same; begin attending to resulting action items including assessment of additional requested documents (1.2); assist with preparation for upcoming hearing on LKC amended fee application (1.0).	9.40	1250.00	11,750.00
6/02/25	BA	Review emailed document request from SAFE AHG and correspondence from JS regarding same (0.1); confer with JS and EB regarding document request, privilege issues, and response to same (1); review and redact requested document, confer with SD as needed for assistance with same, and correspond with EB and JS regarding redactions and privilege issues (0.8); confer with JS and correspond with bankruptcy counsel, CS and SD as needed to direct preparation of, review, and ensure filing of exhibit and witness hearing for LKC dispute (0.3); correspond and confer with JS regarding ongoing demands from SAFE AHG (0.2); correspond with JS, and with JS and EB, regarding hearing [redacted] and witness preparation, Topping deposition and further document requests, and outreach to Akin regarding hearing (0.4); review rough TR of Topping deposition to assist with hearing preparation (0.8).	3.60	1200.00	4,320.00
6/02/25	JS	Prepare for hearing on LKC retention application (6.9); attend portions of deposition of C. Topping in connection with same (1.8).	8.70	1025.00	8,917.50
6/02/25	CS	Review, finalize, and file witness and exhibit list for hearing on retention of LKC as special litigation counsel.	.30	850.00	255.00
6/02/25	SD	Analyze draft application for order authorizing Lehotsky Keller Cohn as special litigation counsel and application to employ Lehotsky Keller Cohn as special litigation counsel as instructed by BA (1.9); prepare new draft of debtors' witness and exhibit list, prepare proposed PDF, compile exhibits to be filed along with debtors' witness and exhibit list, and send to BA, CS, and JS (0.5).	2.40	350.00	840.00

Invoice # 14602 July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/02/25	MV	Review and correspond with vendor regarding status of client document downloads.	.20	425.00	85.00
6/02/25	RF	Review, analyze, calendar, and inform the team of new filings.	.60	525.00	315.00
6/03/25	EB	Analyze and address requests from counsel for SAFE AHG for further documents (1.9); continue analyzing materials including transcript and exhibits and assisting with preparation for C. Topping testimony at LKC retention application hearing (3.1); meet with [redacted] (BA present for portion) regarding same (1.7); attend meet and confer requested by counsel for SAFE AHG (0.5).	7.20	1250.00	9,000.00
6/03/25	BA	Analyze action items to assist with hearing preparation (0.8); review multiple additional SAFE document requests and begin assessing privilege, burden, and work product issues and correspond with EB and JS regarding same (1.0); correspond with JS regarding [redacted] and legal analysis in preparation for hearing on LKC dispute, outline [redacted], and convey same to JS (1.0); confer with EB and [redacted] to assist in witness preparation for hearing (0.8); prepare for meet and confer with SAFE counsel (0.3); participate in meet and confer with SAFE AHG, EB, JS, and other counsel in preparation for hearing on LKC matter, and confer further with EB and JS regarding same (0.7).	4.60	1200.00	5,520.00
6/03/25	JS	Prepare for hearing on LKC retention application.	10.30	1025.00	10,557.50
6/03/25	ASA	Prepare briefing and supporting documentation at request of JS in support of his preparation for June 4 hearing regarding retention of Lehotsky Keller Cohn LLP.	2.30	350.00	805.00
6/03/25	SD	Obtain and organize C. Topping deposition materials in advance of hearing (0.3); prepare and provide BA and JS with additional materials including replies regarding Lehotsky Keller Cohn's retention application (0.3).	.60	350.00	210.00
6/03/25	MV	Continue working with vendor to secure client document exports.	.50	425.00	212.50
6/03/25	RF	Review, analyze, and inform EB, BA, JS, and CS of new filings.	.10	525.00	52.50

Invoice # 14602 July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/04/25	EB	Review and correspond with BA and JS regarding new objectionable correspondence from counsel for SAFE AHG (0.4); review newly added SAFE AHG exhibits (0.2); continue assisting with hearing preparation (1.0); attend hearing on LKC updated fee application (3.0); begin attending to resulting action items including assessing material for 5-page brief (0.5).	5.10	1250.00	6,375.00
6/04/25	BA	Review correspondence from SAFE AHG changing position regarding exhibit agreements and correspond with JS and EB regarding hearing [redacted] (0.4); monitor hearing on LKC dispute (2.0); analyze points for post hearing memorandum and correspond with SD regarding research for same (0.2).	2.60	1200.00	3,120.00
6/04/25	JS	Prepare for and attend hearing on LKC retention application, including redoing direct examination in light of SAFE AHG's withdrawal of agreement to proceed partially by declaration.	11.30	1025.00	11,582.50
6/04/25	MV	Check status of exporting of client data to confirm progress and timing.	.10	425.00	42.50
6/04/25	RF	Review and analyze new filings (0.2); correspond with EB, BA, JS, and CS regarding same (0.2).	.40	525.00	210.00
6/05/25	EB	Work on 5-page submission in consultation with BA, JS, co-counsel, and counsel for LKC.	2.60	1250.00	3,250.00
6/05/25	BA	Confer with JS, EB, and LKC team regarding post-hearing brief and [redacted] for same (0.7); confer with SD as needed regarding research for same, and research and begin drafting same (2.9).	3.60	1200.00	4,320.00
6/05/25	JS	Work on potential [redacted] with objectors (0.9); work on post-hearing brief (1.5).	2.40	1025.00	2,460.00
6/05/25	SD	Research bankruptcy treatises concerning Rule 2014 for BA (1.7); prepare and send materials to BA (0.5); begin drafting debtors' post-hearing memorandum as directed by BA (0.4).	2.60	350.00	910.00
6/05/25	MV	Continue assessing progress of client data downloads and update EB regarding status.	.20	425.00	85.00
6/05/25	RF	Review, analyze, and correspond with EB, BA, JS, and CS regarding new filings.	.30	525.00	157.50

Invoice # 14602 July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/06/25	EB	Continue working on 5-page brief and supporting research (2.0); confer with BA regarding [redacted] and edits to same (0.2).	2.20	1250.00	2,750.00
6/06/25	BA	Continue researching and drafting post-hearing memorandum regarding LKC dispute and convey drafts to JS and EB for review (5.3): confer with EB regarding [redacted] and edits to draft (0.2).	5.50	1200.00	6,600.00
6/06/25	JS	Review and evaluate post-hearing brief (2.0); work on potential [redacted] with objectors (1.2).	3.20	1025.00	3,280.00
6/06/25	SD	Assist BA with materials in support of post-hearing briefing.	.30	350.00	105.00
6/06/25	MV	Continue working on export of client data.	.20	425.00	85.00
6/06/25	RF	Correspond with EB, BA, JS, and CS regarding status and new filings.	.20	525.00	105.00
6/07/25	EB	Continue working on 5-page post-hearing brief in consultation with BA and JS (1.0); review and communicate with BA and JS regarding [redacted] relating to same (0.2).	1.20	1250.00	1,500.00
6/07/25	BA	Review correspondence from AHG regarding potential [redacted] and request for additional information, review LKC response to same, and correspond with JS and EB regarding same.	.20	1200.00	240.00
6/07/25	JS	Work on post-hearing brief (1.3); continued work on potential [redacted] with objectors and evaluating information request from SAFE AHG in connection with same (1.0).	2.30	1025.00	2,357.50
6/08/25	BA	Correspond with JS regarding research questions for post-hearing memorandum and AHG request for extension.	.10	1200.00	120.00
6/09/25	EB	Continue working on 5-page post-hearing brief.	1.50	1250.00	1,875.00
6/09/25	BA	Continuing researching issues relevant to LKC fee dispute, review and edit draft memorandum, and review court order regarding deadline and audio recording.	1.60	1200.00	1,920.00
6/09/25	JS	Work on post-hearing brief.	1.90	1025.00	1,947.50
6/09/25	MV	Continue working to export client documents.	.50	425.00	212.50
6/09/25	RF	Correspond with EB, BA, JS, and CS regarding action items and pleadings.	.60	525.00	315.00

Invoice # 14602 July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/10/25	EB	Continue revising and communicating with BA, JS, client and co-counsel regarding final revisions to post-hearing brief including to incorporate comments from client and co-counsel.	4.90	1250.00	6,125.00
6/10/25	BA	Review revisions to joint filing from LKC's attorneys, correspond with EB and JS regarding same and further potential revisions, and confer with JS regarding same (0.8); confer with EB and [redacted] regarding same (0.1); confer as needed with SD to supervise cite check for joint post-hearing filing, continue researching and revising same, correspond with JS, EB, and LKC's attorneys regarding same, and finalize and final same (3.2).	4.10	1200.00	4,920.00
6/10/25	JS	Work on and assist in finalizing post-hearing brief.	3.30	1025.00	3,382.50
6/10/25	SD	Assist EB, BA, and JS with final revisions to and finalization of post-hearing memorandum.	5.00	350.00	1,750.00
6/10/25	MV	Continue working to export client data for backup.	.20	425.00	85.00
6/10/25	RF	Correspond with EB, BA, JS, and CS regarding new filings.	.20	525.00	105.00
6/11/25	BA	Review SAFE AHG's post-hearing memorandum (0.2); correspond with JS and EB regarding data storage (0.1).	.30	1200.00	360.00
6/11/25	QH	Download and transfer multiple-part zip files from Logikcull onto an external hard drive.	1.20	350.00	420.00
6/11/25	PB	Discuss status and advise MV regarding database export of client documents.	.50	850.00	425.00
6/11/25	SD	Review, organize, and track post-hearing briefing and qc docket updating of earlier filings related to LKC retention to ensure completeness and accuracy.	.80	350.00	280.00
6/11/25	MV	Meet with PB regarding next steps in support of export of client documents (0.5); continue working on same in consultation with QH and preparing for end of vendor hosting cotract (3.3).	3.80	425.00	1,615.00
6/12/25	EB	Correspond with BA and JS regarding data storage issues and correspondence with client regarding same.	.10	1250.00	125.00
6/12/25	MV	Continue working to save and verify exported client files including load files to external hard drive.	1.20	425.00	510.00

Stris & Maher LLP

Invoice # 14602 July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/16/25	QH	Download and transfer 00346 RHOD - Gen 001 export of 148 multiple-part zip files from Logikcull onto an external hard drive.	1.80	350.00	630.00
6/16/25	MV	Check status of data transfer.	.10	425.00	42.50
6/17/25	MV	Continue working on (1.2), update EB regarding (0.2), and draft memoranda regarding (1.5) export of client data.	2.90	425.00	1,232.50
6/18/25	MV	Correspond with vendor regarding end of document hosting and end of contract process.	.20	425.00	85.00
6/20/25	NC	Review and organize recent filings for attorney review.	2.40	350.00	840.00
6/20/25	MV	Correspond with EB regarding instructions to vendor and end of contract process.	.20	425.00	85.00
6/26/25	MV	Continue working on end of document vendor and client backup process in consultation with EB, PB, and QH.	1.20	425.00	510.00
6/27/25	MV	Review correspondence from QH regarding status and next steps in support of vendor contract termination and work on same.	.50	425.00	212.50
6/30/25	MV	Work with vendor on final steps to terminate contract and confirm exports of client data.	3.50	425.00	1,487.50
		TOTAL PROFESSIONAL SERVICES			**$ 133,992.50**

Invoice # 14602 July 16, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	34.20	1,250.00	42,750.00
Bridget Asay	BA	Partner	26.20	1,200.00	31,440.00
John Stokes	JS	Partner	43.40	1,025.00	44,485.00
Colleen Smith	CS	Associate	.30	850.00	255.00
Peter Brody	PB	Associate	.50	850.00	425.00
Rachel Fleischer	RF	Staff Attorney	2.40	525.00	1,260.00
Monica Viramontes	MV	Sr Paralegal	15.50	425.00	6,587.50
Quoc Hoang	QH	Legal Technology Spe	3.00	350.00	1,050.00
Andrew Atsalis	ASA	Fellow	2.30	350.00	805.00
Sebastian Delgado	SD	Fellow	11.70	350.00	4,095.00
Nicholas Capalbo	NC	Fellow	2.40	350.00	840.00
Total			**141.90**		**$ 133,992.50**

EXPENSES ADVANCED

Date	Task	Description	Amount
5/29/25		JS airfare for hearing on LKC retention.	1,176.96
5/30/25		JS lodging for hearing on LKC retention.	325.24
6/01/25		Logikcull Discovery Solutions (June 2025).	2,646.00
6/03/25		Vendor fee for transcripts for Charles Topping dated 06/02/2025.	1,990.69
6/04/25		JS transportation for hearing on LKC retention.	349.27
		TOTAL EXPENSES ADVANCED	**$ 6,488.16**
		TOTAL THIS INVOICE	**$ 140,480.66**

Invoice # 14602 July 16, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14517	4/23/25	503,457.91	404,817.41	98,640.50
14547	5/14/25	55,720.00	44,576.00	11,144.00
14575	6/10/25	162,946.86	131,083.36	31,863.50

Previous Balance	$ 141,648.00
Balance Due This Invoice	$ 140,480.66
TOTAL BALANCE DUE	**$ 282,128.66**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 31,863.50	$ 109,784.50	$ .00	$ .00	$ 141,648.00

Stris

July 16, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14615
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through June 30, 2025

RE: Retention and Fee Applications

Total Professional Services	$ 7,227.50
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 7,227.50**
Previous Balance	$ 9,101.00
TOTAL BALANCE DUE	**$ 16,328.50**

Electronic Invoice

Invoice # 14615 July 16, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
5/13/25	JS	Prepare for and attend status conference on Stris retention application.	1.70	1025.00	1,742.50
6/05/25	EB	Begin preparing portions of monthly fee statement.	.50	1250.00	625.00
6/05/25	NC	Assist EB in preparation of monthly fee statements.	.70	350.00	245.00
6/06/25	EB	Continue preparing portions of monthly fee statement.	.90	1250.00	1,125.00
6/09/25	EB	Continue preparing portions of monthly fee statement.	1.20	1250.00	1,500.00
6/10/25	EB	Continue preparing portions of monthly fee statement.	1.10	1250.00	1,375.00
6/13/25	VO	Prepare May monthly fee statement.	.60	1025.00	615.00

TOTAL PROFESSIONAL SERVICES **$ 7,227.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	3.70	1,250.00	4,625.00
Victor O'Connell	VO	Partner	.60	1,025.00	615.00
John Stokes	JS	Partner	1.70	1,025.00	1,742.50
Nicholas Capalbo	NC	Fellow	.70	350.00	245.00
Total			**6.70**		**$ 7,227.50**

TOTAL THIS INVOICE **$ 7,227.50**

Stris & Maher LLP

Invoice # 14615 July 16, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14532	4/23/25	11,102.50	8,882.00	2,220.50
14561	5/14/25	20,292.50	16,234.00	4,058.50
14588	6/10/25	14,110.00	11,288.00	2,822.00

Previous Balance	$ 9,101.00
Balance Due This Invoice	$ 7,227.50
TOTAL BALANCE DUE	**$ 16,328.50**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 2,822.00	$ 6,279.00	$ .00	$ .00	$ 9,101.00

Stris

July 16, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14630
Client # 00346
Matter # 008

INVOICE SUMMARY

For professional services rendered through June 30, 2025

RE: Non-working Travel

Total Professional Services	$ 6,640.00
50% discount	$ -3,320.00
Net Professional Services	$ 3,320.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 3,320.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14630 July 16, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
6/03/25	JS	Non-working travel to hearing on LKC retention.	2.00	1025.00	2,050.00
6/04/25	JS	Non-working return travel from hearing on LKC retention.	4.00	1025.00	4,100.00
6/05/25	SD	Travel to and from Vermont Law School to conduct research on bankruptcy treatises concerning Rule 2014 and employment of an attorney for BA .	1.40	350.00	490.00

TOTAL PROFESSIONAL SERVICES	**$ 6,640.00**
50% discount	$ -3,320.00
NET PROFESSIONAL SERVICES	**$ 3,320.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
John Stokes	JS	Partner	6.00	1,025.00	6,150.00
Sebastian Delgado	SD	Fellow	1.40	350.00	490.00
Total			**7.40**		**$ 6,640.00**

TOTAL THIS INVOICE **$ 3,320.00**

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 ELEVENTH MONTHLY FEE STATEMENT
FOR THE PERIOD JULY 1, 2025, THROUGH JULY 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 July 1, 2025, through July 31, 2025 (the "Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $128,704.00 (80% of the services rendered), plus $5,387.03 (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.

[1] 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 (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 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;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (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 (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 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 (ha.nguyen@usdoj.gov), 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 19th day of August, 2025.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
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Cameron Kelly (SBN 24120936)
Alain Jaquet (*pro hac vice)*
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-and-

STRIS & MAHER LLP

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-and-

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Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on August 19, 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

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	166.10	$147,572.50	$118,058.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	5.30	$2,485.00	$1,988.00
007	Retention and Fee Applications	8.60	$5,822.50	$4,658.00
008	Non-working Travel	8.00	$5,000.00	$4,000.00
Total		188.00	$160,880.00	$128,704.00

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	63.70	$79,625.00
Tillman Breckenridge	Partner	2003	1,200.00	3.10	$3,720.00
Ken Halpern	Partner	1997	1,100.00	31.60	$34,760.00
Peter Brody	Associate	2016	850.00	11.50	$9,775.00
Monica Viramontes	Senior Paralegal	N/A	425.00	.30	$127.50
Andrew Atsalis	Litigation Fellow	N/A	350.00	42.30	$14,805.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	13.60	$4,760.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Bridget Asay	Partner	1997	1,200.00	.30	$360.00
Monica Viramontes	Senior Paralegal	N/A	425.00	5.0	$2,125.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	2.0	2,500.00
Victor O'Connell	Partner	2012	1,025.00	1.5	1,537.50
Cynthia Huang	Litigation Fellow	N/A	350.00	5.1	1,785.00

Non-Working Travel[2]

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	8.0	$10,000.00
Total after 50% discount					$5,000.00

[2] Stris & Maher has billed its time for travel during which no work was performed on a separate invoice at a 50% discount.

EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
E-discovery platform fees	$3,765.00
Travel	$1,032.58
Printing services	$47.04
Total	**$4,844.62**

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
Printing services	$542.41
Total	**$542.41**

EXHIBIT 4

Stris

August 7, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14650
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through July 31, 2025

RE: Midas Green Litigation

Total Professional Services	$ 147,572.50
Total Expenses Advanced	$ 4,844.62
TOTAL THIS INVOICE	**$ 152,417.12**
Previous Balance	$ 15,771.99
TOTAL BALANCE DUE	**$ 168,189.11**

Electronic Invoice

Stris & Maher LLP

Invoice # 14650 August 7, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
7/01/25	EB	Review current draft further brief opposing Midas claim (0.3); work on same (0.5) and correspond with KH, TB, and ASA regarding further revisions to same (0.4).	1.20	1250.00	1,500.00
7/01/25	KJH	Further review and revise reply in opposition to Midas's proof claim and correspond with EB and TB regarding same.	1.90	1100.00	2,090.00
7/01/25	TB	Revise reply brief opposing Midas patent claim.	3.10	1200.00	3,720.00
7/01/25	ASA	Assist KH and TB with edits to reply brief opposing Midas patent claim and work with R. Harrington to implement same.	2.00	350.00	700.00
7/02/25	EB	Prepare for hearing on objection to Midas claim.	1.80	1250.00	2,250.00
7/02/25	KJH	Work on revisions to reply brief in consultation with R. Harrington.	.70	1100.00	770.00
7/03/25	EB	Attend teleconferences with KH (0.5) and R. Harrington (0.2) regarding action items in support of revisions to further brief objecting to Midas claim and hearing; prepare for hearing (4.8); review and communicate with R. Harrington regarding further revised brief (0.7).	6.20	1250.00	7,750.00
7/03/25	KJH	Teleconferences with EB regarding revisions to reply in opposition to Midas's proof of claim (0.5); teleconferences with R. Harrington regarding revisions to reply in opposition to Midas's proof of claim (0.2); review events in Western District of Texas action since summary judgment hearing and correspond with EB regarding same (0.4); review and revise reply in opposition to Midas's proof of claim (0.6); review case law regarding exclusion of postpetition conduct from claim in bankruptcy and correspond with EB regarding same (0.4).	2.10	1100.00	2,310.00
7/03/25	ASA	Prepare materials requested by EB in preparation for upcoming hearing (1.6); correspond with B. Howell regarding sealed briefing in preparation for same (0.1).	1.70	350.00	595.00

Stris & Maher LLP

Invoice # 14650 August 7, 2025

Date	Tkpr	Description	Hours	Rate	Amount
7/07/25	EB	Continue preparing for hearing on objection to Midas claim (8.0); review proposed final further brief and correspond with P. Tomasco, R. Harrington, and KH regarding same (0.3); correspond with KH, PB, ASA, and R. Harrington regarding summary judgment hearing slides (0.1).	8.40	1250.00	10,500.00
7/07/25	KJH	Review and revise reply brief in opposition to proof of claim and correspond with R. Harrington and EB regarding same.	.70	1100.00	770.00
7/08/25	EB	Continue preparing for (3.9) and attend (0.5) hearing on objection to Midas proof of claim; attend to resulting action items in consultation with P. Tomasco and R. Harrington (0.5); update Stris team and begin preparing summary judgment motion (1.5); confer with KH regarding same (0.3).	6.70	1250.00	8,375.00
7/08/25	KJH	Analyze hearing on Midas' proof of claim in support of subsequent briefing (0.3); confer with EB regarding same (0.3); conduct research in support of further briefing including regarding status of Midas's [redacted] on asserted patents (1.0).	1.60	1100.00	1,760.00
7/09/25	EB	Continue working on summary judgment motion.	1.20	1250.00	1,500.00
7/09/25	KJH	Work on portions of summary judgment briefing.	1.50	1100.00	1,650.00
7/09/25	ASA	Conduct research relating to deponents from district court case for EB and KH in support of summary judgment briefing (0.8); attention to detailed tracking of deadlines set by S.D. Texas Bankruptcy Court (0.2).	1.00	350.00	350.00
7/10/25	EB	Continue working on summary judgment motion (2.0); and estimation motion (0.3); correspond with prospective client witness regarding status (0.1).	2.40	1250.00	3,000.00
7/11/25	EB	Correspond with ASA regarding documents and potential exhibits for summary judgment motion.	.20	1250.00	250.00
7/11/25	NC	Attention to detailed tracking of recent filings and hearing materials.	.50	350.00	175.00
7/11/25	ASA	Prepare materials for EB in support of drafting of motion for summary judgment and motion for estimation.	3.20	350.00	1,120.00
7/13/25	EB	Continue working on summary judgment motion.	1.20	1250.00	1,500.00
7/15/25	EB	Work on summary judgment motion.	2.00	1250.00	2,500.00

Invoice # 14650 August 7, 2025

Date	Tkpr	Description	Hours	Rate	Amount
7/15/25	NC	Assist EB with preparation of additional materials for summary judgmetn motion.	.70	350.00	245.00
7/16/25	EB	Prepare for (0.5) and attend (0.8) teleconference with clients regarding upcoming briefing and next steps in support of hearing preparation; correspond with [redacted] experts regarding upcoming hearing (0.2); continue working on summary judgment briefing (1.1).	2.60	1250.00	3,250.00
7/16/25	NC	Continue assisting EB with additional materials in support of summary judgment motion and hearing.	.90	350.00	315.00
7/16/25	PB	Assess and assist EB with action items in support of hearing preparation.	.20	850.00	170.00
7/17/25	EB	Correspond with [redacted] expert regarding upcoming hearing.	.10	1250.00	125.00
7/18/25	EB	Prepare (0.2) for and attend (0.5) teleconference with [redacted] expert; update client and co-counsel regarding same (0.1); continue working on summary judgment motion and hearing preparation (1.5).	2.30	1250.00	2,875.00
7/20/25	EB	Review and respond to correspondence from co-counsel and client regarding expert.	.10	1250.00	125.00
7/21/25	EB	Confer with KH regarding status and action items in support of summary judgment motion, Rule 11 motion, and hearing preparation including expert retention (0.3); correspond with [redacted] expert regarding same (0.2); continue working on summary judgment brief (4.0).	4.50	1250.00	5,625.00
7/21/25	KJH	Teleconference with EB regarding brief in support of summary judgment motion in bankruptcy court.	.30	1100.00	330.00
7/21/25	NC	Assist EB and ASA with upcoming filing.	.40	350.00	140.00
7/21/25	ASA	Assist EB (2.4) and KH (0.4) with drafting of portions and collection and analysis of material including district court briefing and expet reports in support of summary judgment motion.	2.80	350.00	980.00

Invoice # 14650 August 7, 2025

Date	Tkpr	Description	Hours	Rate	Amount
7/22/25	EB	Work on declaration in support of summary judgment motion (0.6); continue drafting brief in support of same (4.9); correspond with KH, PB, ASA, and NC regarding action items in support of same (0.2); attend teleconference with KH, ASA, and NC regarding same (0.4).	6.10	1250.00	7,625.00
7/22/25	KJH	Teleconference with EB, ASA, and NC regarding preparation of motion for summary judgment in bankruptcy court.	.40	1100.00	440.00
7/22/25	NC	Attend teleconference with EB, KH, and ASA regarding action items in support of preparation of motion for summary judgment in bankruptcy court.	.40	350.00	140.00
7/22/25	ASA	Teleconference with EB, KH, and NC regarding preparation of motion for summary judgment in bankruptcy court (0.4); review initial draft of motion for summary judgment and prepare additional exhibits requested by EB (1.6).	2.00	350.00	700.00
7/23/25	EB	Continue revising summary judgment motion (1.5); correspond with KH, PB, ASA, and NC regarding further revisions to same (0.2).	1.70	1250.00	2,125.00
7/23/25	KJH	Review and revise draft motion for summary judgment and confer and correspond with EB regarding same.	9.20	1100.00	10,120.00
7/23/25	NC	Compile and qc supporting documents for Brannen Declaration in support of summary judgment motion.	2.80	350.00	980.00
7/23/25	PB	Draft portions of motion for summary judgment in bankruptcy proceeding (3.8); review correspondence from EB regarding same (0.2).	4.00	850.00	3,400.00
7/23/25	ASA	Assist PB with further drafting and revisions to summary judgment motion.	1.10	350.00	385.00
7/24/25	EB	Review Midas subpoenas to Chase and Cameron Blackmon and correspond with K. Halpern, P. Tomasco, and clients regarding same (0.3); further revise summary judgment motion (0.6).	.90	1250.00	1,125.00
7/24/25	KJH	Review Midas subpoenas to Chase and Cameron Blackmon and correspond with E. Brannen, P. Tomasco, [redacted], and [redacted] regarding same (0.3); further revise motion for summary judgment (4.5).	4.80	1100.00	5,280.00

Invoice # 14650 August 7, 2025

Date	Tkpr	Description	Hours	Rate	Amount
7/24/25	NC	Continue compiling and reviewing documents for Brannen declaration.	1.10	350.00	385.00
7/24/25	PB	Draft motion for summary judgment on Midas's bankruptcy claims.	1.30	850.00	1,105.00
7/24/25	ASA	Draft and revise declaration in support of summary judgment motion as instructed by EB.	3.10	350.00	1,085.00
7/25/25	EB	Correspond with KH, PB, ASA, and NC regarding revisions to and next steps in support of summary judgment motion and supporting documents (0.2); review correspondence from KH and R. Harrington regarding estimation motion (0.1).	.30	1250.00	375.00
7/25/25	KJH	Review and revise draft motion to estimate and correspond with R. Harrington, EB and PB regarding same (0.8); correspond with EB, PB, AA, R. Harrington and P. Tomasco regarding revisions to draft motion for summary judgment (0.4).	1.20	1100.00	1,320.00
7/25/25	NC	Continue revising supporting declaration for summary judgment motion.	.30	350.00	105.00
7/25/25	ASA	Assist KH with further revisions to draft summary judgment motion (4.1); compile additional District Court documents in preparation for use as exhibits (1.5).	5.60	350.00	1,960.00
7/25/25	MV	Correspond with PB regarding Relativity vendor and document status.	.10	425.00	42.50
7/26/25	PB	Revise draft motion for summary judgment on Midas bankruptcy claims for patent infringement.	1.00	850.00	850.00
7/27/25	KJH	Further revise motion for summary judgment of noninfringement.	1.50	1100.00	1,650.00
7/28/25	EB	Continue working on summary judgment motion and supporting documents (3.7); correspond with PB regarding additional research in support of damages section of same (0.2); review and comment on estimation motion (1.9); advise KH, PB, ASA, and NC regarding next steps in support of same and supporting Brannen declaration and documents (0.4).	6.20	1250.00	7,750.00
7/28/25	KJH	Correspond with EB and ASA regarding revisions to summary judgment motion.	.20	1100.00	220.00

Invoice # 14650 August 7, 2025

Date	Tkpr	Description	Hours	Rate	Amount
7/28/25	NC	Continue assisting attorneys with further revisions to summary judgment motion and supporting documents including review of previously submitted jury instructions as requested by EB.	2.30	350.00	805.00
7/28/25	PB	Continue revising draft motion for summary judgment on Midas patent claims for bankruptcy court.	2.90	850.00	2,465.00
7/28/25	ASA	Continue assisting attorneys with further revisions to summary judgment motion and supporting declaration.	4.30	350.00	1,505.00
7/29/25	EB	Review and further revise summary judgment motion (2.3); review and revise supporting Brannen declaration (0.5); communicate with R. Harrington, KH, PB, ASA, and NC regarding next steps in support of same including preparation of proposed order, confirmation of applicable procedures, final review and revisions, and redactions from brief (0.4); review revised estimation motion and correspond with R. Harrington regarding further revisions to same (0.2); analyze next steps regarding Midas subpoenas in GRC case and correspond with client and co-counsel regarding same (0.2).	3.60	1250.00	4,500.00
7/29/25	NC	Assist ASA with legal cite checking of summary judgment motion (3.9); prepare and revise proposed order in support of same as directed by EB (0.3).	4.20	350.00	1,470.00
7/29/25	PB	Revise, finalize, and oversee filing of motion for summary judgment on Midas bankruptcy claims regarding patent infringement.	2.10	850.00	1,785.00
7/29/25	ASA	Assist PB with final revisions to, and cite checking and compilation of summary judgment and voluminous supporting materials (10.0); correspond and coordinate with R. Harrington and B. Howell regarding finalization and filing of same (0.5).	10.50	350.00	3,675.00
7/30/25	EB	Correspond with PB, ASA, and NC regarding high priority action items including compilation of recent filings for [redacted] expert and hearing preparation (0.5); attend teleconference with C. Underwood regarding upcoming hearing and Midas subpoenas (0.1); review and respond to client correspondence regarding service of subpoena and analyze next steps to oppose and potentially quash same (0.3); prepare for hearing (1.0).	1.90	1250.00	2,375.00

Invoice # 14650 August 7, 2025

Date	Tkpr	Description	Hours	Rate	Amount
7/30/25	ASA	Compile materials for [redacted] expert as requested by EB (2.7); correspond with B. Howell regarding proof of service of sealed documents (0.3); begin assembling materials for EB for use at upcoming August 22 hearing (0.6).	3.60	350.00	1,260.00
7/31/25	EB	Correspond with Stris team, clients, and P. Tomasco regarding high priority action items (0.5); attend teleconference with [redacted] expert regarding status and upcoming hearing (0.2); work on sanctions motion (0.3), hearing preparation (0.5), and opposition to Midas subpoena to Chase Blackmon in GRC case (0.6).	2.10	1250.00	2,625.00
7/31/25	KJH	Research and work on drafting sanctions motion.	5.50	1100.00	6,050.00
7/31/25	ASA	Assist KH with requested legal research including regarding Rule 11 and Federal Rule of Bankruptyc Procedure 9011.	1.40	350.00	490.00
7/31/25	MV	Update EB regarding Relativity vendor status and terms with respect to documents potentially needed for upcoming hearing.	.20	425.00	85.00
		TOTAL PROFESSIONAL SERVICES			**$ 147,572.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	63.70	1,250.00	79,625.00
Tillman Breckenridge	TB	Partner	3.10	1,200.00	3,720.00
Ken Halpern	KJH	Partner	31.60	1,100.00	34,760.00
Peter Brody	PB	Associate	11.50	850.00	9,775.00
Monica Viramontes	MV	Sr Paralegal	.30	425.00	127.50
Andrew Atsalis	ASA	Fellow	42.30	350.00	14,805.00
Nicholas Capalbo	NC	Fellow	13.60	350.00	4,760.00
Total			**166.10**		**$ 147,572.50**

Invoice # 14650 August 7, 2025

EXPENSES ADVANCED

Date	Task	Description	Amount
6/30/25		JND Discovery Invoice for June 2025.	3,765.00
7/07/25		EB lodging for hearing in Houston.	946.81
7/08/25		EB transportation for hearing in Houston.	42.43
7/09/25		EB transportation for hearing in Houston.	43.34
7/11/25		Document printing for hearing.	47.04
		TOTAL EXPENSES ADVANCED	**$ 4,844.62**
		TOTAL THIS INVOICE	**$ 152,417.12**

Stris & Maher LLP

Invoice # 14650 August 7, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14614	7/16/25	83,677.36	67,905.37	15,771.99

Previous Balance	$ 15,771.99
Balance Due This Invoice	$ 152,417.12
TOTAL BALANCE DUE	**$ 168,189.11**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 15,771.99	$ .00	$ .00	$ .00	$ .00	$ 15,771.99

Stris

August 7, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14638
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through July 31, 2025

RE: Whinstone Litigation

Total Professional Services	$ 2,485.00
Total Expenses Advanced	$ 542.41
TOTAL THIS INVOICE	**$ 3,027.41**
Previous Balance	$ 26,798.50
TOTAL BALANCE DUE	**$ 29,825.91**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Stris & Maher LLP

Invoice # 14638 August 7, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
7/01/25	MV	Continue working on final client data export.	5.00	425.00	2,125.00
7/08/25	BA	Review ruling on motion to update LCK retention application and attend to final action items including client update.	.30	1200.00	360.00
		TOTAL PROFESSIONAL SERVICES			**$ 2,485.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Bridget Asay	BA	Partner	.30	1,200.00	360.00
Monica Viramontes	MV	Sr Paralegal	5.00	425.00	2,125.00
Total			**5.30**		**$ 2,485.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
6/23/25		Vendor fee for hearing document printing.	542.41
		TOTAL EXPENSES ADVANCED	**$ 542.41**
		TOTAL THIS INVOICE	**$ 3,027.41**

Stris & Maher LLP

Invoice # 14638 August 7, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14602	7/16/25	140,480.66	113,682.16	26,798.50

Previous Balance	$ 26,798.50
Balance Due This Invoice	$ 3,027.41
TOTAL BALANCE DUE	**$ 29,825.91**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 26,798.50	$ .00	$ .00	$ .00	$ .00	$ 26,798.50

Stris

August 7, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14651
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through July 31, 2025

RE: Retention and Fee Applications

Total Professional Services	$ 5,822.50
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 5,822.50**
Previous Balance	$ 1,445.50
TOTAL BALANCE DUE	**$ 7,268.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14651 August 7, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
7/01/25	CHH	Assist VO with drafting and preparing third interim fee application and supporting documents.	4.80	350.00	1,680.00
7/08/25	VO	Review and revise CH draft of quarterly fee application.	.70	1025.00	717.50
7/08/25	CHH	Review and analyze docket materials and B. Howell (Quinn) email pertaining to plan status and draft section of third interim fee application regarding same.	.30	350.00	105.00
7/13/25	EB	Begin preparing monthly fee statement.	.80	1250.00	1,000.00
7/15/25	EB	Work on portions of monthly fee statement.	.80	1250.00	1,000.00
7/16/25	EB	Continue preparing portions of monthly fee statement.	.40	1250.00	500.00
7/17/25	VO	Prepare June fee application.	.80	1025.00	820.00
		TOTAL PROFESSIONAL SERVICES			**$ 5,822.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	2.00	1,250.00	2,500.00
Victor O'Connell	VO	Partner	1.50	1,025.00	1,537.50
Cynthia Huang	CHH	Fellow	5.10	350.00	1,785.00
Total			**8.60**		**$ 5,822.50**

TOTAL THIS INVOICE **$ 5,822.50**

Stris & Maher LLP

Invoice # 14651 August 7, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14615	7/16/25	7,227.50	5,782.00	1,445.50

Previous Balance	$ 1,445.50
Balance Due This Invoice	$ 5,822.50
TOTAL BALANCE DUE	**$ 7,268.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 1,445.50	$ .00	$ .00	$ .00	$ .00	$ 1,445.50

Stris

August 7, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14652
Client # 00346
Matter # 008

INVOICE SUMMARY

For professional services rendered through July 31, 2025

RE: Non-working Travel for Whinstone Dispute

Total Professional Services	$ 10,000.00
50% discount	$ -5,000.00
Net Professional Services	$ 5,000.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 5,000.00**
Previous Balance	$ 664.00
TOTAL BALANCE DUE	**$ 5,664.00**

Electronic Invoice

Invoice # 14652 August 7, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
7/07/25	EB	Travel to Houston for hearing on objection to Midas claim.	2.20	1250.00	2,750.00
7/09/25	EB	Return travel from Houston hearing.	5.80	1250.00	7,250.00

TOTAL PROFESSIONAL SERVICES	**$ 10,000.00**
50% discount	$ -5,000.00
NET PROFESSIONAL SERVICES	**$ 5,000.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	8.00	1,250.00	10,000.00
Total			**8.00**		**$ 10,000.00**

TOTAL THIS INVOICE	**$ 5,000.00**

Stris & Maher LLP

Invoice # 14652 August 7, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14630	7/16/25	3,320.00	2,656.00	664.00

Previous Balance	$ 664.00
Balance Due This Invoice	$ 5,000.00
TOTAL BALANCE DUE	**$ 5,664.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 664.00	$ .00	$ .00	$ .00	$ .00	$ 664.00

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.

[1] 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 (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 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;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (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 (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 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 (ha.nguyen@usdoj.gov), 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)*
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-and-

STRIS & MAHER LLP

Peter K. Stris (*pro hac vice*)
Victor O'Connell (*pro hac vice*)
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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

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	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

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
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 Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
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

EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

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

EXHIBIT 4

Stris

September 12, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14680
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through August 31, 2025

RE: Midas Green Litigation

Total Professional Services	$ 232,210.00
Total Expenses Advanced	$ 1,258.81
TOTAL THIS INVOICE	**$ 233,468.81**
Previous Balance	$ 168,189.11
TOTAL BALANCE DUE	**$ 401,657.92**

Electronic Invoice

Stris & Maher LLP

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 [redacted] 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	EB	Prepare for (0.9) and attend (1.2) initial preparation meeting with [redacted] 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

Stris & Maher LLP

Invoice # 14680 September 12, 2025

Date	Tkpr	Description	Hours	Rate	Amount
8/04/25	KJH	Attend teleconference with [redacted] expert [redacted] and E. Brannen regarding preparation for [redacted] 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	PB	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	EB	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 [redacted] expert report on [redacted] 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	PB	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	EB	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

Stris & Maher LLP

Invoice # 14680 September 12, 2025

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	EB	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	PB	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

Stris & Maher LLP

Invoice # 14680 September 12, 2025

Date	Tkpr	Description	Hours	Rate	Amount
8/08/25	EB	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	PB	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	EB	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 [redacted] 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	PB	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	EB	Work with [redacted] 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

Stris & Maher LLP

Invoice # 14680 September 12, 2025

Date	Tkpr	Description	Hours	Rate	Amount
8/13/25	EB	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 [redacted] and [redacted] 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	PB	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

Stris & Maher LLP

Invoice # 14680 September 12, 2025

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	PB	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 [redacted] 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	PB	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

Stris & Maher LLP

Invoice # 14680 September 12, 2025

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	PB	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	PB	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

Invoice # 14680 September 12, 2025

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 [redacted] 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, [redacted] and [redacted] regarding 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 [redacted] testimony and '457 patent to extract helpful material (1).	5.30	1100.00	5,830.00
8/21/25	NC	Correspond with E. Brannen, [redacted], Patty Tomasco, and Rachel Harrington regarding upcoming meeting.	.20	350.00	70.00
8/21/25	PB	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 [redacted] 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

Invoice # 14680 September 12, 2025

Date	Tkpr	Description	Hours	Rate	Amount
8/22/25	EB	Prepare for upcoming teleconference with [redacted] 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	PB	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 [redacted] 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 [redacted] 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	PB	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 [redacted] expert.	2.70	1250.00	3,375.00
8/26/25	KJH	Attend teleconference with [redacted] expert [redacted], 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 [redacted] 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

Invoice # 14680 September 12, 2025

Date	Tkpr	Description	Hours	Rate	Amount
8/27/25	EB	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 [redacted] 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	PB	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 [redacted] expert (0.1); attend teleconference with K. Halpern, P. Brody, and A. Atsalis to revise materials for [redacted] 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 [redacted] direct examination hearing [redacted] (1); correspond with A. Atsalis regarding scheduling (0.1); confer with A. Atsalis regarding edits to [redacted] (0.4).	1.50	1100.00	1,650.00
8/28/25	PB	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 [redacted] direct examination hearing [redacted] (1); correspond with K. Halpern regarding scheduling (0.1); confer with K. Halpern regarding edits to [redacted] direct exam materials (0.4); edit same as directed by K. Halpern (0.6)..	2.10	350.00	735.00
8/29/25	EB	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

Stris & Maher LLP

Invoice # 14680 September 12, 2025

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 [redacted] (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	PB	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**

Stris & Maher LLP

Invoice # 14680 September 12, 2025

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	$ 168,189.11
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

Stris

September 12, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14681
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through August 31, 2025

RE: Retention and Fee Applications

Total Professional Services	$ 3,300.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 3,300.00**
Previous Balance	$ 7,268.00
TOTAL BALANCE DUE	**$ 10,568.00**

Electronic Invoice

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**

Stris & Maher LLP

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 Balance	$ 7,268.00
Balance Due This Invoice	$ 3,300.00
TOTAL BALANCE DUE	**$ 10,568.00**

AGED ACCOUNTS RECEIVABLE

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

FEES INCURRED BY QUINN EMANUEL REGARDING
THE MIDAS TECHNOLOGY CLAIM OBJECTION

DATE	QE	NARRATIVE	HOURS	HOURLY RATE	AMOUNT
2/5/25	RH	Draft Midas claim objection	3.4	$1,165.00	$3,961.00
2/6/25	RH	Revisions to the Midas claim objection	.9	$1,165.00	$1,048.50
2/6/25	RH	Legal research to support review of district court order in Midas litigation	2.5	$1,165.00	$2,912.50
3/7/25	RH	Revise the Midas claim objection	2.0	$1,165.00	$2,330.00
3/13/25	RH	Proof Midas claim objection and order	.8	$1,165.00	$932.00
4/10/25	RH	Revisions to Midas Green Claim objection (.8); draft motion to seal and order (1.1)	1.9	$1,165.00	$2,213.50
4/14/25	PT	Correspond with E. Brannen and C. Topping regarding filing Midas Green claim objection in light of the district court delay (.2)	.2	$1,945.00	$389.00
4/15/25	PT	Revise and finalize Midas claim objection (.3); coordinate filing of same with R. Harrington to do declaration to support preclusion (.2); follow up with R. Harrington regarding need to seal Midas claim objection (.3)	.8	$1,945.00	$1,556.00
4/15/25	BH	Work with attorneys to finalize the claim objection to the Midas Green proofs of claim (1.8); file the sealed claim objection and the unsealed claim objection (.6) and forward a copy of the sealed claim objection to the attorneys for Midas Green (.1)	2.5	$655.00	$1,637.50
4/15/25	RH	Draft and coordinate Brannen declaration (1.4); review and redact Midas claim objection (1.)	2.4	$1,165.00	$2,796.00
4/17/25	BH	Finalize (.6) and file the amended objection to the Midas Green claims (.3); finalize (.2) and file the Motion to Seal the Midas Green Claim Objection (.3); distribute file-stamped copies to the Client (.1)	1.5	$655.00	$982.50
5/8/25	PT	Review and analyze the Midas response to claim objection (.4) and	.6	$1,945.00	$1,167.00

DATE	QE	NARRATIVE	HOURS	HOURLY RATE	AMOUNT
		emails with E. Brannen regarding same (.2)			
5/28/25	PT	Review and respond to court inquiry regarding scheduling hearing on Midas Green claim objection with E. Brannen (.5); correspond with E. Brannen regarding logistics for claims objection hearing and potential for summary disposal (.2)	.7	$1,945.00	$1,361.50
5/30/25	PT	Conference call with Rachel Harrington, Elizabeth Brannen, Bridget Asay, John Stokes, Collen Smith to discuss strategy for Midas Green claim objection (.8); correspondence with R. Harrington regarding using dispositive motion on Midas Green and Proof claim objections and forward research (.4).	1.2	$1,945.00	$2,334.00
6/5/25	PT	Correspond with E. Brannen regarding Midas Green claim objection (.2)	.2	$1,945.00	$389.00
6/25/25	RH	Draft Midas Green reply (3.1)	3.1	$1,165.00	$3,611.50
6/26/25	RH	Call with co-counsel to discuss the Midas Green claim objection (.3)	.3	$1,165.00	$349.50
7/2/25	RH	Legal research into preclusion doctrines (3.5); call with K. Halpern to discuss claim objection (.5); draft Midas reply (5.8)	9.8	$1,165.00	$11,417.00
7/3/25	PT	Preparation for the hearing on the Midas Green claim objection (1.4)	1.4	$1,945.00	$2,723.00
7/3/25	RH	Draft the Midas reply (5.); identify and draft exhibit list (1.); incorporate revisions to reply (1.5); calls with E. Brannen to discuss reply (.3); draft proposed scheduling order (.6)	8.4	$1,165.00	$9,786.00
7/7/25	RH	Incorporate edits to the Midas Reply and proposed order (1.5); proof and finalize reply (.7); call with E. Brannen to discuss upcoming hearing (.3); legal research to distinguish opposition cases (1.5); create presentation for hearing (6.1).	10.1	$1,165.00	$11,766.50
7/8/25	BH	Prepare hearing notebooks and pleading notebooks for P. Tomasco	2.4	$655.00	$1,572.00

DATE	QE	NARRATIVE	HOURS	HOURLY RATE	AMOUNT
		and R. Harrington (1.1); attend part of the hearing by telephone (.8); finalize (.2) and file the proposed Scheduling Order for Contested Matter re Midas Claim Objection (.3).			
7/8/25	PT	Meeting with E. Brannen and R. Harrington regarding hearing presentation and hearing preparation (2.1); prepare for (.2) and participate in hearing on claim objection re Midas Green (1.); follow up review and revisions to proposed scheduling order (.4).	3.7	$1,945.00	$7,196.50
7/8/25	RH	Legal research into preclusion doctrines (1.1); revise presentation (1.); attend Midas hearing (1.); discuss strategy for Midas claim objection (1.5); draft revised proposed order (.5); legal research into Delaware statute of limitations (1.)	6.1	$1,165.00	$7,106.50
7/18/25	PT	Correspond with E. Brannen regarding retaining expert for Midas Green litigation (.1)	.1	$1,945.00	$194.50
7/24/25	PT	Review subpoena request from Midas Green and correspondence with E. Brannen and C. Topping regarding same and timing compared to hearing on summary judgment motion (.8)	.8	$1,945.00	$1,556.00
7/24/25	RH	Draft Midas Claim estimation motion	4.0	$1,165.00	$4,660.00
7/25/25	RH	Draft Midas estimation motion (5.5); review motion for summary judgment (.6)	6.1	$1,165.00	$7,106.50
7/28/25	PT	Review, revise and suggest additional revisions to motion for summary judgment (1.2); correspondence with E. Brannen regarding additional charges to motion for summary judgment against Midas Green (.7)	1.9	$1,945.00	$3,695.50
7/29/25	RH	Revise and incorporate comments to Midas estimation motion (3.1); draft proposed order (.5); finalize estimation motion (.5); draft motion	5.6	$1,165.00	$6,524.00

DATE	QE	NARRATIVE	HOURS	HOURLY RATE	AMOUNT
		to seal (.5); review and send edits to motion for summary judgment (1.)			
8/5/25	PT	Correspondence with E. Brannen regarding procedures for hearing (.1); review and revise proposed rule 11 letter to Midas Green and additional research regarding 1927 to include in letter (1.3)	1.4	$1,945.00	$2,723.00
8/6/25	PT	Correspond with E. Brannen regarding hearing preparation for Midas claim objection and witness logistics (.2)	.2	$1,945.00	$389.00
8/11/25	PT	Review and suggest response to amended Midas Green claims (.4); correspondence with chambers and E. Brannen regarding rescheduling hearing (.6)	1.0	$1,945.00	$1,945.00
8/12/25	RH	Draft notice of rescheduled hearing regarding Midas Claims	.4	$1,165.00	$466.00
8/12/25	PT	Coordinate reset hearing date with E. Brannen and chambers and correspondence regarding briefing schedule (.9); correspondence with E. Brannen regarding timing for sanctions motion (.2); review and suggest revisions to letter to Midas counsel (.3); coordinate hearing date notice (.1)	1.5	$1,945.00	$2,917.50
8/13/25	RH	Review Midas opposition papers (.5); legal research into related issues (4.4).	4.9	$1,165.00	$5,708.50
8/13/25	BH	Draft Notice of Rescheduled Hearing regarding Midas Green Technology's claims (.3) and file same (.3).	.6	$655.00	$393.00
8/15/25	RH	Legal Research in support of Reply to Midas estimation motion (5.8)	5.8	$1,165.00	$6,757.00
8/19/25	RH	Revisions to Midas estimation reply (4.8); proof reply (.5)	5.3	$1,165.00	$6,174.50
8/19/25	BH	Work with attorneys to finalize (4.1) and file the Reply in Support of Summary Judgment Motion in Support of Amended Omnibus Objection to Claims filed by Midas Green Technologies (.4); serve both J	4.8	$655.00	$3,144.00

DATE	QE	NARRATIVE	HOURS	HOURLY RATE	AMOUNT
		Thomas (.2); distribute same to the Client (.1)			
8/28/25	PT	Review and comment on filing by Midas Green	.3	$1,945.00	$583.50
8/4/25	PT	Review and comment on draft rule 11 letter to Midas Green (.3)	.3	$1,945.00	$583.50
Total			111.9		$137,059.50