

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

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

DEBTORS' NOTICE OF APPEAL

Rhodium Encore LLC, and its affiliates, as debtors and debtors in possession (collectively, the “Debtors” or “Rhodium”) in the above-captioned chapter 11 cases, pursuant to 28 U.S.C. § 158(a), appeal to the United States District Court for the Southern District of Texas from the following orders entered by the United States Bankruptcy Court for the Southern District of Texas:

- **ECF No. 1592:** Memorandum Opinion Overruling Debtors’ Omnibus Objection at ECF No. 1126 to the SAFE Proofs of Claim
- **ECF No. 1593:** Order Overruling Debtors' Omnibus Objection at ECF No. 1126 to the SAFE Proofs of Claim
- All other rulings that, as a matter of law for purposes of appeal, are merged into these orders as stated in Fed. R. Bankr. P. 8003(a)(4)

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.



The parties to the orders appealed from, and the names and addresses of their counsel are:

Appellees:

Celsius Holdings US LLC
RH Fund III, a Series of Telegraph Treehouse,
LP
Christopher McBee
BT Real Estate LLC
Alfred Murray Capital, LLC
Philip M. Fornaro Trust dated January 9, 2017
Noble Crest Capital, LLC
Brad Weber
Proof Capital Special Situations Fund
JWS QRP Holdings LLC
AnnMarie Fornaro Trust dated January 9, 2017
Alexander Matthew Salvadori
Official Committee of Unsecured Creditors

Pepper Grove Holdings Limited
James M Farrar and Adda Delgadillo
Farrar
Liquid Mining Fund III, LLC
Ranger Private Investment Partners, L.P.
Thomas Lienhart
Winchester Partners, L.P.
Infinite Mining, LLC
Ten R Ten, LLC
Magic Circle Trust
Jeffrey Smith
Sean Michael Gilbert
Emil Stefkov
Patty Yang

Appellees' Counsel:

AKIN GUMP STRAUSS HAUER & FELD
LLP

Sarah Link Schultz (State Bar No. 24033047);
S.D. Tex. 30555)
Elizabeth D. Scott (State Bar No. 24059699;
S.D. Tex. 2255287)
2300 N. Field Street, Suite 1800
Dallas, TX 75201-2481
Telephone: (214) 969-2800
Email: sschultz@akingump.com
Email: edscott@akingump.com

Mitchell P. Hurley (admitted *pro hac vice*)
One Bryant Park New York, NY 10036-6745
Telephone: (212) 872-1000
Email: mhurley@akingump.com

GENEVIEVE GRAHAM LAW, PLLC
DBA GRAHAM PLLC

Genevieve M. Graham (State Bar No.
24085340)
PO Box 130378
Houston, Texas 77219
Telephone: (832) 367.5705
ggraham@graham-pllc.com

MORRIS JAMES LLP

Carl N Kunz, III
3205 Avenue North Blvd., Suite 100
Wilmington, DE 19803
Phone: 302-888-6800
Email: ckunz@morrisjames.com

LESSNE HOFFMAN, PLLC

Michael D. Lessne Florida Bar No.: 73881
Matthew I. Rochman Florida Bar No.: 84615
100 SE 3rd Avenue, 10th Floor
Fort Lauderdale, FL 33394
Telephone: 954-372-5759
Email: mlessne@lessnehoffman.law
Email: mrochman@lessnehoffman.law

GREENBERG TRAUIG, LLP

Shari L. Heyen
James Tillman Grogan, III
1000 Louisiana St., Suite 6700
Houston, TX 77002
Email: shari.heyen@gtlaw.com
Email: James.Grogan@gtlaw.com

Ross Barbash

265 Filbert Street
San Francisco CA 94133
Phone: 415-735-6067
Email: consigrsb@gmail.com

BAILEY DUQUETTE P.C.

Alexandre Sauveplane, Esq.
104 Charlton Street, Suite 1W
New York, New York, 10014
alex@baileyduquette.com
212.658.1946 Ext. 207

COLE SCHOTZ P.C.

Justin R. Alberto, Esq. (*pro hac vice*)
Stacy L. Newman, Esq. (*pro hac vice*)
Bryant Churbuck, Esq. (*pro hac vice*)
500 Delaware Ave., Ste. 600
Wilmington, Delaware 19801
Telephone: (302) 652-3131
Email: jalberto@coleschotz.com
Email: snewman@coleschotz.com
Email: bchurbuck@coleschotz.com

Ian Ross Phillips, TX Bar No. 24091239
901 Main Street, Suite 4120
Dallas, Texas 75202
Telephone: (469) 557-9390
Email: iphillips@coleschotz.com

MCDERMOTT WILL & EMERY LLP

Charles R. Gibbs (TX Bar No. 7846300)
Grayson Williams (TX Bar No. 24124561)
2801 North Harwood Street, Suite 2600
Dallas, TX 75201-1664
Telephone: (214) 295-8000
Facsimile: (972) 232-3098
Email: crgibbs@mwe.com
Email: gwilliams@mwe.com

Darren Azman (admitted *pro hac vice*)
Joseph B. Evans (admitted *pro hac vice*)
One Vanderbilt Avenue New York, NY
10017-3852
Telephone: (212) 547-5400
Fax: (212) 547-5444
Email: dazman@mwe.com
Email: jbevans@mwe.com
Gregg Steinman (admitted *pro hac vice*)
333 SE 2nd Avenue, Suite 4500
Miami, FL 33131-2184
Telephone: (305) 329-4473
Facsimile: (305) 503-8805
Email: gsteinman@mwe.com

Appellant:

Rhodium Enterprises, Inc.
Special Committee of the Board of Directors of Rhodium Enterprises, Inc.

Appellant's Counsel:

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

Patricia B. Tomasco (SBN 01797600)
Cameron Kelly (SBN 24120936)
Alain Jaquet (*pro hac vice*)
Rachel Harrington (*pro hac vice*)
700 Louisiana Street, Suite 3900
Houston, Texas 77002
Telephone: 713-221-7000
Facsimile: 713-221-7100
Email: pattytomasco@quinnemanuel.com
Email: cameronkelly@quinnemanuel.com
Email: alainjaquet@quinnemanuel.com
Email: rachelharrington@quinnemanuel.com

Eric Winston (*pro hac vice*)
Razmig Izakelian (*pro hac vice*)
Ben Roth (*pro hac vice*)
865 S. Figueroa Street, 10th Floor
Los Angeles, California 90017
Telephone: 213-443-3000
Facsimile: 213-443-3100
Email: ericwinston@quinnemanuel.com
Email: razmigizakelian@quinnemanuel.com
Email: benroth@quinnemanuel.com

BARNES & THORNBURG LLP

Vincent P. (Trace) Schmeltz III (*pro hac vice*)
One N. Wacker Drive, Suite 4400
Chicago, Illinois 60606
Telephone: 312-214-5602
Facsimile: 312-759-5646
Email: tschmeltz@btlaw.com

Dated: September 13, 2025

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ Patricia B. Tomasco

Patricia B. Tomasco (SBN 01797600)

Cameron Kelly (SBN 24120936)

Alain Jaquet (*pro hac vice*)

Rachel Harrington (*pro hac vice*)

700 Louisiana Street, Suite 3900

Houston, Texas 77002

Telephone: 713-221-7000

Facsimile: 713-221-7100

Email: pattytomasco@quinnemanuel.com

Email: cameronkelly@quinnemanuel.com

Email: alainjaquet@quinnemanuel.com

Email: rachelharrington@quinnemanuel.com

- and -

Eric Winston (*pro hac vice*)

Razmig Izakelian (*pro hac vice*)

Ben Roth (*pro hac vice*)

865 S. Figueroa Street, 10th Floor

Los Angeles, California 90017

Telephone: 213-443-3000

Facsimile: 213-443-3100

Email: ericwinston@quinnemanuel.com

Email: razmigizakelian@quinnemanuel.com

Email: benroth@quinnemanuel.com

*Counsel to Appellant Debtors and
Debtors-In-Possession*