

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)
	§	

CERTIFICATE OF NO OBJECTION
(Relates to ECF No. 1488)

Pursuant to the Procedures for Complex Cases in the Southern District of Texas, the undersigned counsel for the Rhodium Encore LLC and its debtor-affiliates, as debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), certifies as follows:

1. On July 30, 2025, the Debtors, through its counsel, filed *Debtors’ Omnibus Objection To Certain Claims Pursuant To Bankruptcy Code Sections 502(B), Bankruptcy Rule 3007, And Local Rule 3007-1 Because Claims Have Been Satisfied And Based On Other Substantive Grounds* (the “Omnibus Claim Objection”) (ECF No. 1488). The deadline for parties to file responses to the relief requested in the Omnibus Claim Objection was August 29, 2025 (the “Objection Deadline”).

2. The following claimants (the “Claimant[s]”) did not file a response, either formally or informally, by the Objection Deadline (as well as by the date of this *Certificate of No Objection*):

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.

(a) Christopher Blackerby – Claims 123, 158, 159, 164, 166, 168, 170, 171, 173, 174, 175, and 181; (b) Colin Hutchings – Claims 177, 201, and 202; (c) Gaurav Parikh 2020 Revocable Trust – Claims 82, 109, 162, and 165; (d) RH Fund II, a Series of Telegraph Treehouse, LP – Claim 81 ; (e) RH Fund III, a Series of Telegraph Treehouse, LP – Claim 84 (scope of the Omnibus Claim Objection limited to the unliquidated claims which are not based on that certain Simple Agreement for Future Equity that this Claimant entered with Debtor Rhodium Enterprises, Inc.); (e) Shane M. Blackmon – Claims 167, 169, 172, and 176; and (f) Vida Kick LLC – Claims 113, 139, and 143.

3. On August 29, 2025, the Ad Hoc Group of SAFE Parties (the “SAFE AHG”) filed the *Limited Response Of The Ad Hoc Group Of SAFE Parties To Debtors’ Omnibus Objection To Certain Claims Pursuant To Bankruptcy Code Sections 502(B), Bankruptcy Rule 3007, And Local Rule 3007-1* (ECF No. 1591), objecting solely to one of the various arguments that Debtors made in support of the relief sought in the Omnibus Claim Objection. None of the Claimants covered by this *Certificate of No Objection* are members of the SAFE AHG.²

4. On September 29, 2025, the Debtors and Claimants Liquid Mining Fund I, LLC and Liquid Mining Fund II, LLC filed the proposed *Agreed Order On Debtors’ Objection To Claims Of Liquid Mining Fund I, LLC and Liquid Mining Fund II, LLC* (ECF No. 1590), pursuant to which (a) Liquid Mining Fund I, LLC agreed to withdraw Claims 122, 124, 126, and 136; and

² Compare Omnibus Claim Objection at 13-14 (listing claimants) with *Third Supplemental Verified Statement of Ad Hoc Group of SAFE Parties Pursuant to Bankruptcy Rule 2019, Exhibit A* (listing members of the SAFE AHG) (ECF No. 1346).

(b) Liquid Mining Fund II, LLC agreed to withdraw Claims 100, and 101. The Court entered the related order on September 2, 2025 (ECF No. 1595).

5. On September 5 2025, the Debtors and Claimants Thomas Lienhart, James M. Farrar and Adda Delgadillo Farrar, Cross the River LLC, Elysium Mining LLC, Infinite Mining LLC, and Trine Mining LLC filed the proposed *Stipulation and Agreed Order On Certain Claims Included In Debtors' Omnibus Claim Objection At Docket No. 1488* (ECF No. 1613), pursuant to which (a) Claimant Cross the River LLC agreed to withdraw with prejudice Claims 187, 191, 207, and 211; (b) Claimant Elysium Mining LLC agreed to withdraw with prejudice Claims 188, 193, 214, and 216; (c) Claimant Trine Mining LLC agreed to withdraw with prejudice Claims 189, 192, 206, 212, and 215; (d) Claimant Thomas Lienhart agreed to withdraw with prejudice Claim 44, and Claim 152 (except for the related SAFE claim included herein, which was not covered by the Omnibus Claim Objection); (e) Claimants James M. Farrar and Adda Delgadillo Farrar agreed to withdraw with prejudice Claim 83 (except for the related SAFE claim included herein),³ Claim 149 (except for the related SAFE claim included herein, which was not covered by the Omnibus Claim Objection), and Claim 151; and (f) Claimant Infinite Mining LLC agreed to withdraw with prejudice Claim 197 (except for the related SAFE claim included herein, which was not covered by the Omnibus Claim Objection) and Claim 198 (except for the related SAFE claim included herein).⁴ The Court entered the related order on September 8, 2025 (ECF No. 1619).

6. The undersigned counsel for the Debtors respectfully requests that the Court enter the proposed order attached hereto at its earliest convenience.

³ Claim 83 was not amongst the Claims to which the Debtors objected in the Omnibus Claim Objection.

⁴ Claim was 198 was not amongst the Claims to which the Debtors objected in the Omnibus Claim Objection.

Respectfully submitted this 19th day of September, 2025.

QUINN EMANUEL URQUHART &
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/s/ Patricia B. Tomasco

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*Counsel to the Debtors and
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CERTIFICATE OF SERVICE

I, Patricia B. Tomasco, hereby certify that on the 19th day of September, 2025, a copy of the foregoing Certificate of No Objection was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco

Patricia B. Tomasco

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE 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)
	§	
	§	
	§	

**ORDER SUSTAINING DEBTORS' OMNIBUS OBJECTION TO CERTAIN CLAIMS
PURSUANT TO BANKRUPTCY CODE SECTIONS 502(B), BANKRUPTCY RULE
3007, AND LOCAL RULE 3007-1 BECAUSE CLAIMS HAVE BEEN SATISFIED AND
BASED ON OTHER SUBSTANTIVE GROUNDS**

(Relates to ECF No. 1488)

Upon consideration of *Debtors' Omnibus Objection To Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 Because Claims Have Been Satisfied And Based On Other Substantive Grounds* (the "Objection");² and this Court having jurisdiction to consider the Objection and the relief requested therein pursuant to 28 U.S.C. § 1334; and consideration of the Objection and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Objection having been provided; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and the Court having found and determined that the legal and

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation thereon; and good and sufficient cause appearing therefor;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Objection is **SUSTAINED** as to the specific claims and the following Claims are **DISALLOWED**:

- a. Christopher Blackerby – Claims 123, 158, 159, 164, 166, 168, 170, 171, 173, 174, 175, and 181;
- b. Colin Hutchings – Claims 177, 201, and 202;
- c. Gaurav Parikh 2020 Revocable Trust – Claims 82, 109, 162, and 165;
- d. RH Fund II, a Series of Telegraph Treehouse, LP – Claim 81;
- e. RH Fund III, a Series of Telegraph Treehouse, LP – Claim 84 (limitedly to unliquidated claims which are not based on that certain Simple Agreement for Future Equity that this Claimant entered with Debtor Rhodium Enterprises, Inc.);
- f. Shane M. Blackmon – Claims 167, 169, 172, and 176; and
- g. Vida Kick LLC – Claims 113, 139, and 143.

2. The Debtors, the Debtors' Court-appointed claims and noticing agent, and the Clerk of this Court are authorized to modify the Debtors' claim registers in compliance with the terms of this order and to take all steps necessary or appropriate to carry out the relief granted in this order.

3. Nothing in this order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the Claimants.

4. Nothing in the Objection or this order, nor any actions or payments made by the Debtors pursuant to this order, shall be construed as: (i) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable nonbankruptcy law; (ii) a waiver of the Debtors' or any other party in interest's right to dispute any claim; (iii) a promise or requirement to pay any particular claim; (iv) an implication or admission that any particular claim is of a type specified or defined in this order; (v) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (vi) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

5. This order is immediately effective and enforceable.

6. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this order.

Dated: _____, 2025

ALFREDO R. PEREZ
UNITED STATES BANKRUPTCY JUDGE