

# Direct Examination of Dr. Alfonso Ortega

Debtors' Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 filed by Midas Green Technologies, LLC

In re: RHODIUM ENCORE LLC, et al.

September 23, 2025



## Dr. Alfonso Ortega

The James R. Bile Professor of Energy Technology, Villanova University

#### **Education**

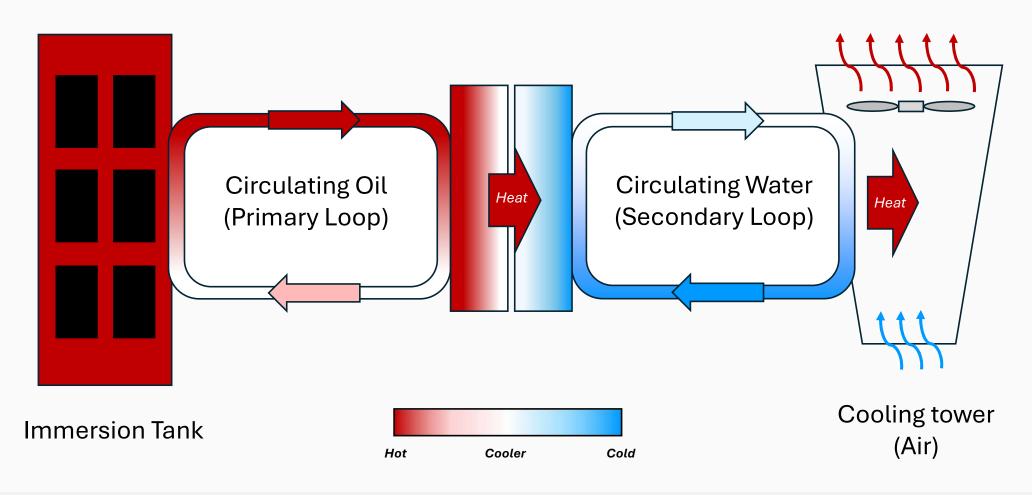
- Ph.D., Mechanical Engineering, Stanford University, June 1986 (Supervisor: Prof. Robert J. Moffat)
- M.S., Mechanical Engineering, Stanford University, August 1978
- B.S., Mechanical Engineering, University of Texas at El Paso, August 1976

#### **Other Current Positions**

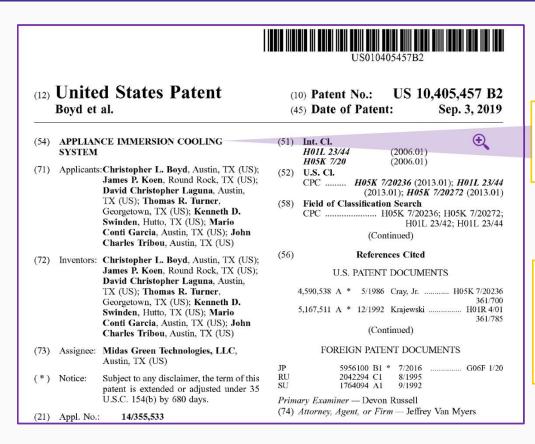
Founder and Director, The Laboratory for Advanced Thermal and Fluid Systems, University of Arizona (1990-2004), Villanova University (2005-present)

Founding Director, The National Science Foundation Industry/University Cooperative Research Center (I/UCRC) on Energy Smart Electronic Systems (ES2)

# **Basic Immersion Cooling Principles**



## U.S. Patent No. 10,405,457



# APPLIANCE IMMERSION COOLING SYSTEM

Title of the '457 Patent

**Independent Claim 1** 

Dependent Claim 5

Asserted Claims of the '457 Patent

'457 Patent

#### **Asserted Claims of '457 Patent**

"1 . An appliance immersion cooling system comprising:

a tank adapted to immerse in a dielectric fluid a plurality of electrical appliances, each in a respective appliance slot distributed vertically along, and extending transverse to, a long wall of the tank, the tank comprising . . . "

"5 . The system of claim 1

wherein the control facility further comprises a communication facility adapted to facilitate monitoring and control of the control facility from a remote location."

Claim 1 of the '457 Patent (excerpted)

Claim 5 of the '457 Patent (excerpted)

# **Appliance Slots**

"1 . An appliance immersion cooling system comprising: a tank adapted to immerse in a dielectric fluid a plurality of electrical appliances, each in a respective appliance slot distributed vertically along, and extending transverse to, a long wall of the tank, the tank comprising:

a weir, integrated horizontally into the long wall of the tank adjacent all appliance slots, having an overflow lip adapted to facilitate substantially uniform recovery of the dielectric fluid flowing through each appliance slot; and; . . . "

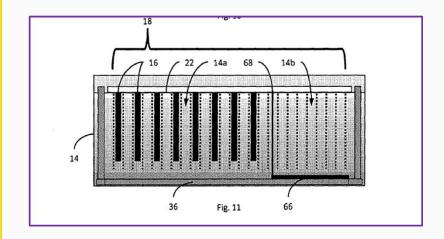


Fig. 11 of the '457 Patent

Claim 1 of the '457 Patent (excerpted)

# Figure 1 of the '457 Patent

**Q** 

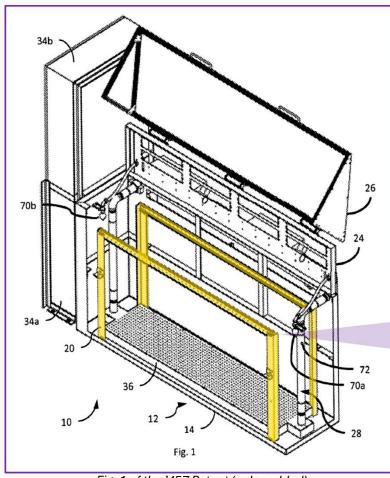
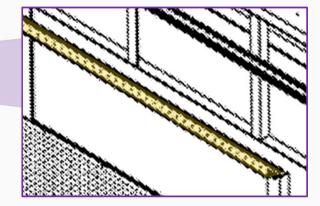


Fig. 1 of the '457 Patent (color added)

"... an appliance rack facility **20** of convention design adapted to suspend the appliance **16**..."

Col. 3, ll. 49-51 of '457 Patent (excerpted)



# **Rhodium's Tanks**

Exhibit No. 31

Filed Under Seal

Exhibit No. 32

Filed Under Seal

# **Primary & Secondary Fluid Circulation Facilities**

"1 . An appliance immersion cooling system comprising . . .

a secondary fluid circulation facility adapted to extract heat from the dielectric fluid circulating in the primary circulation facility, and to dissipate to the environment the heat so extracted; and . . . "

Hot
Cooler
Cold

Claim 1 of the '457 Patent (excerpted)

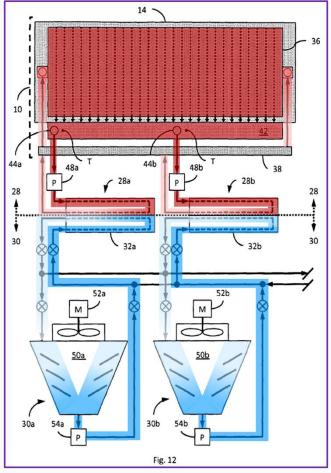
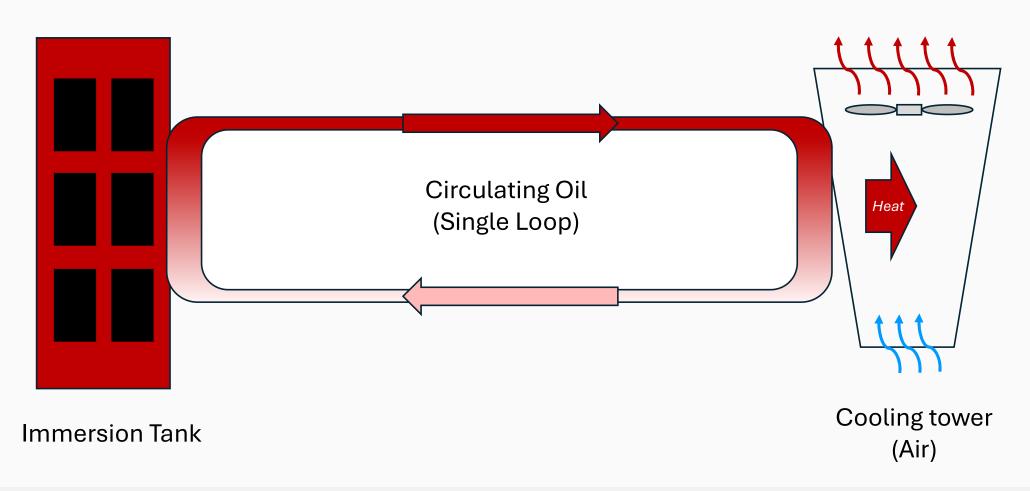


Fig. 12 of the '457 Patent (color added)

# **Rhodium's Single Loop Cooling System**



# **Control Facility**

- 1. An appliance immersion cooling system comprising: a tank adapted to immerse in a dielectric fluid a plurality of electrical appliances, each in a respective appliance slot distributed vertically along, and extending transverse to, a long wall of the tank, the tank comprising: a weir, integrated horizontally into the long wall of the tank adjacent all appliance slots, having an overflow lip adapted to facilitate substantially uniform recovery of the dielectric fluid flowing through each appliance slot; and;
  - a dielectric fluid recovery reservoir positioned vertically beneath the overflow lip of the weir and adapted to receive the dielectric fluid as it flows over the weir;
- a primary circulation facility adapted to circulate the dielectric fluid through the tank, comprising:
  - a plenum, positioned adjacent the bottom of the tank, adapted to dispense the dielectric fluid substantially uniformly upwardly through each appliance slot;
- a secondary fluid circulation facility adapted to extract heat from the dielectric fluid circulating in the primary circulation facility, and to dissipate to the environment the heat so extracted; and
- a control facility adapted to coordinate the operation of the primary and secondary fluid circulation facilities as a function of the temperature of the dielectric fluid in the tank.

"... a control facility adapted to coordinate the operation of the primary and secondary fluid circulation facilities as a function of the temperature of the dielectric fluid in the tank."

Claim 1 of the '457 Patent (excerpted)