

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

In re:
RHODIUM ENCORE, LLC, et al.,

Debtors,

Chapter 11

Case No. 24-90448 (ARP)

(Jointly Administered)

DESIGNATION OF RECORD ON APPEAL
PURSUANT TO FED. R. BANKR. P. 8009

Pursuant to Fed. R. Bankr. P. 8009, Midas Green Technologies LLC (“Appellant”), by and through its undesignated counsel, hereby submits this designation of the record on appeal of the *Order Sustaining Debtors’ Amended Omnibus Objection To Claim Numbers 004, 062, And 068–072 And Estimating Midas Green’s Claims* (ECF 1879) and *Memorandum Opinion And Order On Debtors’ Amended Omnibus Objection To Claim Numbers 004, 062, And 068–072 and Debtors’ Motion To Estimate* (ECF 1878) entered by the Bankruptcy Court on October 28, 2025 in the above captioned bankruptcy case.

1. Notice of Appeal

- a. Notice of Appeal filed on November 11, 2025 in the Bankruptcy Case (ECF 1983).



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2. The Judgment, Order or Decree Appealed from

a. Order Sustaining Debtors' Amended Omnibus Objection To Claim Numbers 004, 062, And 068–072 And Estimating Midas Green's Claims (ECF 1879)

3. Any Opinion, Findings of Fact, and Conclusions of Law of the Bankruptcy Court

a. Memorandum Opinion and Order on Debtors' Amended Omnibus Objection To Claim Numbers 004, 062, And 068–072 and Debtors' Motion To Estimate (ECF 1878)

4. Docket Sheet for the Bankruptcy Case

5. Transcripts Ordered from the Reporter:

- a. July 8, 2025 Hearing*
- b. September 23, 2025 Hearing*
- c. September 24, 2025 Hearing*

6. Additional items as described in the Docket Sheet for the Bankruptcy Case)

Appellant designates the following items for inclusion in the record on appeal. Such designation of pleadings and matters of record includes all exhibits attached or referred to in the designated items and all exhibits admitted at the relevant hearings:

Date Filed	Court Docket #	Document Name
9/18/2024		Proof of Claim filed by Midas.pdf
11/13/2024		Midas Claim filed against Rhodium - Modified Official 410 Form _10MW.pdf
11/13/2024		Midas Claim filed against Rhodium - Modified Official 410 Form _2.0.pdf
11/13/2024		Midas Claim filed against Rhodium - Modified Official 410 Form _30MW.pdf
11/13/2024		Midas Claim filed against Rhodium - Modified Official 410 Form _Encore.pdf
11/13/2024		Midas Claim filed against Rhodium - Modified Official 410 Form _RENEWABLES.pdf
11/13/2024		Midas Claim filed against Rhodium - Modified Official 410 Form _Rhodium Tech.pdf
1/7/2025	611	Rhodium Motion Granting Limited Relief from Automatic Stay to Continue District Court Litigation (15526604 1).pdf
4/15/2025	0952	[Sealed Document] Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC (Filed by Rhodium Encore LLC) (No Image Available)
4/15/2025	0951	Debtors' Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC
4/17/2025	0954	[Sealed Document] Debtors' Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC (Filed by Rhodium Encore LLC) (No Image Available) RelatedDocument(s): 1963, 1962, 1794, 1793, 1757, 1655, 1602, 1486, 1485, 1427, more...
4/17/2025	0953	Debtors' Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC RelatedDocument(s): 1963, 1962, 1878, 1794, 1793, 1757, 1711, 1698, 1602, 1526, more...
4/17/2025	0955	Motion to Seal Debtors' Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC (Filed by Debtor Rhodium Encore LLC)

		RelatedDocument(s): 1074, 1028, 0954
5/8/2025	1069	<p>Midas Green Technologies, LLC's Response to Debtors' Amended Omnibus Objection to Claim Numbers 004, 062 and 068-072 Filed by Midas Green Technologies, LLC (Filed by Midas Green Technologies, LLC)</p> <p>RelatedDocument(s): 1963, 1962, 1794, 1793, 1757, 1655, 1602, 1486, 1485, 1427, more...</p>
5/8/2025	1066	<p>Motion for Admission Pro Hac Vice of Joseph E. Thomas (Thomas Whitelaw & Kolegraff LLP) to Represent Midas Green Technologies, LLC (Filed by Attorney Joseph Thomas)</p> <p>RelatedDocument(s): 1070</p>
5/9/2025	1070	<p>Order for Admission Pro Hac Vice of Joseph E. Thomas (Thomas Whitelaw & Kolegraff LLP) to Represent Midas Green Technologies, LLC</p> <p>RelatedDocument(s): 1072, 1066</p>
5/12/2025	1074	<p>Order Granting the Motion to Seal Debtors' Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC</p> <p>RelatedDocument(s): 1130, 1104, 0955</p>
5/20/2025	1130	<p>Certificate of Service of Andrew Henchen re: 1) Order Granting the Motion to Seal Debtors' Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC; and 2) Notice of Status Conference (Filed by Kurtzman Carson Consultants, LLC dba Verita Global)</p> <p>RelatedDocument(s): 1076, 1074</p>

5/28/2025	1204	<p>Notice of Hearing re: 1) Debtors' Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC; and 2) [Sealed Document] Debtors' Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC; to be Held on July 8, 2025 at 1:00 p.m. (Central Prevailing Time) (Filed by Air HPC LLC, Jordan HPC LLC, Jordan HPC Sub LLC, Rhodium 10MW LLC, Rhodium 10MW Sub LLC, Rhodium 2.0 LLC, Rhodium 2.0 Sub LLC, Rhodium 30MW LLC, Rhodium 30MW Sub LLC, Rhodium Encore LLC, Rhodium Encore Sub LLC, Rhodium Enterprises, Inc., Rhodium Industries LLC, Rhodium JV LLC, Rhodium Ready Ventures LLC, Rhodium Renewables LLC, Rhodium Renewables Sub LLC, Rhodium Shared Services LLC, Rhodium Technologies LLC)</p> <p>RelatedDocument(s): 1226, 0954, 0953</p>
7/7/2025	1413	<p>Reply in Support of Debtors' Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC and Motion for Summary Judgment Briefing Schedule</p> <p>RelatedDocument(s): 1963, 1962, 1794, 1793, 1757, 1655, 1602, 1486, 1485, 1429, more...</p>
7/8/2025		Rhodium Bankruptcy Court- Omnibus Objection Hearing Transcript
7/29/2025	1484	<p>[Sealed Motion] Debtors' Summary Judgment Motion in Support of Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC (Filed by Debtor Rhodium Encore LLC) (No Image Available)</p> <p>RelatedDocument(s): 1757, 1534, 1487</p>
7/29/2025	1483	<p>[Sealed Motion] Motion to Estimate Contingent and Unliquidated Claims of Midas Green Technologies LLC and Grant Related Relief (Filed by Debtor Rhodium Encore LLC) (No Image Available)</p> <p>RelatedDocument(s): 1757, 1655, 1535, 1487</p>

7/30/2025	1486	Debtors' Summary Judgment Motion in Support of Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC [Objections/Request for Hearing Due in 21 days] (Filed by Debtor Rhodium Encore LLC) RelatedDocument(s): 1757, 1711, 1698, 1526, 1520, 1413, 1069, 0954, 0953
7/30/2025	1485	Motion to Estimate Contingent and Unliquidated Claims of Midas Green Technologies LLC and Grant Related Relief (Filed by Debtor Rhodium Encore LLC) RelatedDocument(s): 1878, 1757, 1711, 1698, 1526, 1520, 1413, 1069, 0954, 0953
7/30/2025	1487	Motion to Seal (I) Debtors' Summary Judgment Motion in Support of Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC and (II) Debtors' Motion to Estimate Contingent and Unliquidated Claims of Midas Green Technologies LLC and Grant Related Relief (Filed by Debtor Rhodium Encore LLC) RelatedDocument(s): 1566, 1520, 1484, 1483
8/12/2025	1522	[Sealed Document] Opposition to Debtors Summary Judgment Motion in Support of Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 (Filed by Midas Green Technologies, LLC) (No Image Available) RelatedDocument(s): 1757
8/12/2025	1523	[Sealed Document] Response to Debtors Motion to Estimate Contingent and Unliquidated Claims of Midas Green Technologies LLC (Filed by Midas Green Technologies, LLC) (No Image Available) RelatedDocument(s): 1757, 1655

8/12/2025	1521	<p>Motion to Seal (I) Midas Green Technologies LLC's Opposition to Debtors' Summary Judgment Motion in Support of Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 and (II) Midas Green Technologies LLC's Opposition to Debtors' Motion to Estimate Contingent and Unliquidated Claims of Midas Green Technologies LLC and Grant Related Relief (Filed by Creditor Midas Green Technologies, LLC)</p> <p>RelatedDocument(s): 1618</p>
8/13/2025	1526	<p>Notice of Rescheduled Hearing on Motions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC; to be Held on September 23, 2025 at 1:00 p.m. (Central Prevailing Time) (Filed by Rhodium Encore LLC)</p> <p>RelatedDocument(s): 1531, 1486, 1485, 0953</p>
8/15/2025	1531	<p>Certificate of Service Hannah Bussey re: 1) Tenth Monthly Fee Statement of Province, LLC for Compensation for Services and Reimbursement of Expenses as Financial Advisor to the Debtors for the Period from June 1, 2025 Through June 30, 2025; and 2) Notice of Rescheduled Hearing on Motions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC (Filed by Kurtzman Carson Consultants, LLC dba Verita Global)</p> <p>RelatedDocument(s): 1526, 1524</p>
8/19/2025	1534	<p>Debtors' Reply in Support of Summary Judgment Motion in Support of Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC (Filed by Rhodium Encore LLC)</p> <p>RelatedDocument(s): 1757, 1558, 1484</p>
8/19/2025	1535	<p>Reply in Support of Motion to Estimate Contingent and Unliquidated Claims of Midas Green Technologies LLC and Grant Related Relief (Filed by Rhodium Encore LLC)</p> <p>RelatedDocument(s): 1757, 1483</p>

8/21/2025	1558	<p>Certificate of Service of Michael Villa re: 1) Stris & Maher LLP's Eleventh Monthly Fee Statement for the Period July 1, 2025, Through July 31, 2025; 2) Debtors' Reply in Support of Summary Judgment Motion in Support of Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC; and 3) Reply in Support of Motion to Estimate Contingent and Unliquidated Claims of Midas Green Technologies LLC and Grant Related Relief (Filed by Kurtzman Carson Consultants, LLC dba Verita Global)</p> <p>RelatedDocument(s): 1534, 1533</p>
8/25/2025	1566	<p>Order Granting the Motion to Seal (I) Debtors' Summary Judgment Motion in Support of Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC and (II) Debtors' Motion to Estimate Contingent and Unliquidated Claims of Midas Green Technologies LLC and Grant Related Relief</p> <p>RelatedDocument(s): 1582, 1573, 1487</p>
8/28/2025	1580	<p>[Sealed] Motion for Leave to File to Amend Proof of Claims (Filed by Creditor Midas Green Technologies, LLC) (No Image Available)</p> <p>RelatedDocument(s): 1698, 1695, 1672, 1596, 1581</p>
8/28/2025	1582	<p>Certificate of Service of Hannah Bussey re: Order Granting the Motion to Seal (I) Debtors Summary Judgment Motion in Support of Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC and (II) Debtors Motion to Estimate Contingent and Unliquidated Claims of Midas Green Technologies LLC and Grant Related Relief (Filed by Kurtzman Carson Consultants, LLC dba Verita Global)</p> <p>RelatedDocument(s): 1566</p>

8/28/2025	1579	Midas Green Technologies, LLC's Motion for Mandatory Withdrawal of Reference Pursuant to 28 U.S.C. § 157 and Rule 5011 of the Federal Rules of Bankruptcy Procedure for Abstention [Hearing scheduled for 9/23/2025 at 01:00 PM at Houston, Courtroom 400 (ARP)] (Filed by Creditor Midas Green Technologies, LLC) RelatedDocument(s): 1757, 1711, 1698, 1655
8/28/2025	1581	Motion to Seal Midas Green Technologies, LLC's Notice of Motion and Motion for Leave to Amend the Original Proof of Claims (Filed by Creditor Midas Green Technologies, LLC) RelatedDocument(s): 1672, 1580
9/2/2025	1596	Certificate of Service of Tierra Mendiola re: [Sealed] Motion for Leave to File to Amend Proof of Claims (Filed by Midas Green Technologies, LLC) RelatedDocument(s): 1580
9/4/2025	1602	Debtors' Motion for Sanctions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC [Objections/Request for Hearing Due in 21 days] (Filed by Debtor Rhodium Encore LLC) RelatedDocument(s): 1711, 1662, 1625, 1609, 1413, 1069, 0954, 0953
9/5/2025	1609	Scheduling Order with Respect to the Debtors' Motion for Sanctions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC (ECF No. 1602) RelatedDocument(s): 1641, 1635, 1616, 1602
9/8/2025	1618	Order Granting Motion to Seal (I) Midas Green Technologies LLC's Opposition to Debtors' Summary Judgment Motion in Support of Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 and (II) Midas Green Technologies LLC's Opposition to Debtors' Motion to Estimate Contingent and Unliquidated Claims of Midas Green Technologies LLC and Grant Related Relief RelatedDocument(s): 1630, 1521

9/9/2025	1625	<p>Certificate of Service of Andrea Velez re: Debtors' Motion for Sanctions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC (Filed by Kurtzman Carson Consultants, LLC dba Verita Global)</p> <p>RelatedDocument(s): 1602</p>
9/11/2025	1635	<p>Certificate of Service of Andrea Velez re: Scheduling Order with Respect to the Debtors' Motion for Sanctions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC (ECF No. 1602) (Filed by Kurtzman Carson Consultants, LLC dba Verita Global)</p> <p>RelatedDocument(s): 1609</p>
9/12/2025	1641	<p>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) (Filed by Rhodium Encore LLC) (Note: This document is 47 MB. Depending on the speed of your internet connection, download of this document may take several minutes.)</p> <p>RelatedDocument(s): 1652, 1609</p>
9/17/2025	1652	<p>Certificate of Service of Michael Villa re: 1) Stris & Maher LLP's Twelfth Monthly Fee Statement for the Period August 1, 2025, Through August 31, 2025; and 2) 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 Courts September 5, 2025 Scheduling Order (ECF No. 1609) (Filed by Kurtzman Carson Consultants, LLC dba Verita Global)</p> <p>RelatedDocument(s): 1641, 1639</p>
9/18/2025	1655	<p>Debtors' Opposition to Midas Green Technologies, LLC's Motion for Mandatory Withdrawal of Reference Pursuant to 28 U.S.C. § 157 and Rule 5011 of the Federal Rules of</p>

		Bankruptcy Procedure for Abstention (Filed by Rhodium Encore LLC) RelatedDocument(s): 1757, 1579, 1523, 1483, 1413, 1069, 0954
9/19/2025	1662	Midas Green Technologies, LLC's Opposition to Debtors' Motion for Sanctions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC (ECF No. 1602) (Filed by Midas Green Technologies, LLC) RelatedDocument(s): 1602
9/22/2025	1672	Order Granting Motion to Seal Midas Green Technologies, LLC's Notice of Motion and Motion for Leave to Amend the Original Proof of Claims RelatedDocument(s): 1715, 1581, 1580
9/23/2025		Rhodium Bankruptcy Hearing Transcript.pdf
9/23/2025	1695	Order Granting Midas Green Technologies LLC's Motion for Leave to Amend the Original Proof of Claims RelatedDocument(s): 1717, 1580
9/24/2025		Rhodium -Bankruptcy Full Transcript Hearing.pdf
9/24/2025	1706	Statement Slide Show re: Midas Claim Objection Hearing (Filed by Rhodium Encore LLC) RelatedDocument(s): 1698
9/24/2025		Midas Amended Proof of Claim Re Rhodium 10MW LLC; Midas Amended Proof of Claim Re Rhodium 2.0; Midas Amended Proof of Claim Re Rhodium 30MW LLC; Midas Amended Proof of Claim Re Rhodium Encore; Midas Amended Proof of Claim Re Rhodium Enterprises; Midas Amended Proof of Claim Re Rhodium Renewables; Midas Amended Proof of Claim Re Rhodium Technologies
9/30/2025	1728	Certificate of Service of Michael Villa re: Debtors Opposition to Midas Green Technologies, LLCs Motion for Mandatory Withdrawal of Reference Pursuant to 28 U.S.C. § 157 and Rule 5011 of the Federal Rules of Bankruptcy Procedure for Abstention (Filed by

		Kurtzman Carson Consultants, LLC dba Verita Global)
10/8/2025	1758	[Sealed Document] Midas Green Technologies, LLCs Court Directed Omnibus Brief Regarding Pending Claim Objections and Motions (Filed by Midas Green Technologies, LLC) (No Image Available) RelatedDocument(s): 1759
10/8/2025	1757	Debtors' Post-Hearing Brief in Support of Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC and Related Motions (for Summary Judgment and to Estimate, and in Opposition to Motion to Withdraw the Reference) (Filed by Rhodium Encore LLC) RelatedDocument(s): 1856, 1655, 1579, 1535, 1534, 1523, 1522, 1486, 1485, 1484, more...
10/8/2025	1759	Motion to Seal Midas Green Technologies, LLC's Court Directed Omnibus Brief Regarding Pending Claim Objections and Motions and Supporting Exhibits (Filed by Creditor Midas Green Technologies, LLC) RelatedDocument(s): 1945, 1763, 1758, 1578
10/14/2025	1793	Debtors' Motion for Sanctions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC [Objections/Request for Hearing Due in 21 days] (Filed by Debtor Rhodium Encore LLC) RelatedDocument(s): 1986, 1962, 1807, 1413, 1069, 0954, 0953
10/14/2025	1794	Debtors' Motion for Sanctions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC Pursuant to 11 U.S. Code § 105 and 35 U.S. Code § 285 [Objections/Request for Hearing Due in 21 days] (Filed by Debtor Rhodium Encore LLC) RelatedDocument(s): 1986, 1963, 1807, 1413, 1069, 0954, 0953

5	1878	Rhodium BK Ct Memorandum Opinion and Order on Debtors' Ominbus Objection to Claims Filed by Midas.pdf
10/28/2025	1879	Order Sustaining Debtors' Amended Omnibus Objection to Claim Numbers 004, 062, and 068–072 and Estimating Midas Green's Claims RelatedDocument(s): 1983, 1959, 1906, 1880, 1878
10/28/2025	1880	Report and Recommendation to the District Court Regarding Midas Green Technologies, LLC's Motion to Withdraw the Reference RelatedDocument(s): 1907, 1879, 1878
11/3/2025	1945	Order Granting Motion to Seal Midas Green Technologies, LLC's Court Directed Omnibus Brief Regarding Pending Claim Objections and Motions and Supporting Exhibits RelatedDocument(s): 1971, 1759
11/4/2025	1962	Midas Green Technologies, LLC's Opposition to Debtors' Motion for Sanctions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC (Filed by Midas Green Technologies, LLC) RelatedDocument(s): 1793, 1413, 1069, 0954, 0953
11/4/2025	1963	Midas Green Technologies, LLC's Opposition to Debtors' Motion for Sanctions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC Pursuant to 11 U.S. Code § 105 and 35 U.S. Code § 285 (Filed by Midas Green Technologies, LLC) RelatedDocument(s): 1794, 1413, 1069, 0954, 0953
11/11/2025	1983	Midas Green Technologies, LLC's Notice of Appeal [Appellant Designation due by 11/25/2025] RelatedDocument(s): 1988, 1879, 1878
11/25/2025		Statement of Issues on Appeal

DATED: November 25, 2025

Respectfully submitted,

/s/ Joseph E. Thomas

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on November 25, 2025, a true and correct copy of this document was electronically served via the Court's CM/ECF system on all parties entitled to such notice.

/s/ Tierra Mendiola
Tierra Mendiola