

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

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

**AMENDED AGENDA OF MATTERS SET FOR HEARING  
ON DECEMBER 3, 2025, AT 9:30 A.M.<sup>2</sup>**

Rhodium Encore LLC and its affiliated debtors and debtors in possession (collectively, the “Debtors”) hereby file their Agenda of Matters Set for Hearing on December 3, 2025, at 9:30 a.m. (prevailing Central Time) before the Honorable Alfredo R. Perez.

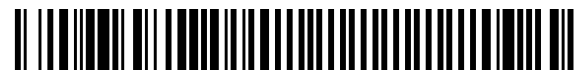
**I. STIPULATION ON MEDIATION PRIVILEGE**

- A. Agreed Mediation Order (Docket No. 966)
- B. Stipulation and Agreed Order Regarding the Production and Use of Mediation-Related Documents and Communications (Docket No. 2061)

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<sup>1</sup> 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.

<sup>2</sup> This Agenda is amended to add the documents in bold print.



## **II. PLAN CONFIRMATION**

1. Second Amended Joint Chapter 11 Plan of Liquidation For Rhodium Encore LLC and its Affiliated Debtors Proposed by Debtors and Ad Hoc Group of SAFE Parties (Docket No. 2062)

### **Plan Supplement Documents**

- A. Notice of Filing Plan Supplement for First Amended Joint Chapter 11 Plan of Liquidation for Rhodium Encore LLC and Its Affiliated Debtors Proposed by Debtors and Ad Hoc Group of SAFE Parties (Docket No. 2001)
- B. Notice of Filing Second Plan Supplement for First Amended Joint Chapter 11 Plan of Liquidation for Rhodium Encore LLC and its Affiliated Debtors Proposed by Debtors and Ad Hoc Group of SAFE Parties (Docket No. 2051)
- C. **Amended Notice of Filing Amended Plan Supplement for Second Amended Joint Chapter 11 Plan of Liquidation for Rhodium Encore LLC and Its Affiliated Debtors Proposed by Debtors and Ad Hoc Group of SAFE Parties (Docket No. 2103)**

### **Confirmation Responses Received**

- A. Lehotsky Keller Cohn LLP's Limited Objection to Plan and Reservation of Rights (Docket No. 2010)
- B. Limited Objection and Reservation of Rights Related to First Amended Joint Chapter 11 Plan of Liquidation for Rhodium Encore LLC and its Affiliated Debtors Proposed by Debtors and Ad Hoc Group of SAFE Parties (Filed by Caleb VanZaeren) (Docket No. 2011)

### **Confirmation Briefs and Declarations in Support of Confirmation**

- A. Plan Proponents' Memorandum of Law in Support of Confirmation of the Second Amended Joint Chapter 11 Plan of Liquidation of Rhodium Encore LLC and Its Affiliated Debtors (Docket No. 2087-Sealed; Docket No. 2088-Redacted)
- B. Declaration of Michael Robinson in Support of Confirmation of the Second Amended Joint Chapter 11 Plan of Liquidation for Rhodium Encore LLC and Its Affiliated Debtors Proposed by Debtors and Ad Hoc Group of SAFE Parties (Docket No. 2063)
- C. Declaration of David Eaton in Support of Plan Confirmation (Docket No. 2074)
- D. Declaration of Mitchell P. Hurley in Support of Plan Confirmation (Docket No. 2075-Sealed; Docket No. 2076-Redacted)

- E. Corrected Declaration of Mitchell P. Hurley in Support of Plan Confirmation (Docket No. 2085)

Plan Support Agreements

- A. Notice of Filing Plan Support Agreement (Docket No. 1347)
- B. Notice of Filing Plan Support Agreement (Docket No. 1747)

Voting Reports

- A. Certificate of Jeffrey Miller Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First Amended Joint Chapter 11 Plan of Liquidation for Rhodium Encore LLC and Its Debtor Affiliates Proposed by Debtors and Ad Hoc Group of SAFE Parties (Docket No. 2050)

Proposed Confirmation Order

- A. ***Proposed Order Approving the Disclosure Statement for, and Confirming, Second Amended Joint Chapter 11 Plan of Liquidation for Rhodium Encore LLC and its Affiliated Debtors Pursuant to Chapter 11 of the Bankruptcy Code (Docket No. 2106)***

Previously Filed Plans

- A. Joint Chapter 11 Plan Of Rhodium Encore LLC and Its Affiliated Debtors (Docket No. 1174)
- B. Amended Joint Chapter 11 Plan of Liquidation of Rhodium Encore LLC and its Affiliated Debtors (Docket No. 1297)
- C. Amended Joint Chapter 11 Plan of Liquidation for Rhodium Encore LLC and its Affiliated Debtors Proposed by Debtors and Ad Hoc Group of SAFE Parties (Docket No. 1750)
- D. First Amended Joint Chapter 11 Plan of Liquidation For Rhodium Encore LLC and Its Affiliated Debtors Proposed by Debtors and Ad Hoc Group of SAFE Parties (Docket No. 1821)
- E. Second Amended Joint Chapter 11 Plan of Liquidation For Rhodium Encore LLC and Its Affiliated Debtors Proposed by Debtors and Ad Hoc Group of SAFE Parties (Docket No. 2062)

Settlement Documents

- A. Notice of Filing of Settlement Stipulation By and Between the Debtors, Acting Through the Special Committee, the SAFE AHG, the Transcend Group, and the Other Encore Parties (Docket No. 2006)

Disclosure Statements, Disclosure Statement Order

- A. Amended Disclosure Statement for Amended Joint Chapter 11 Plan of Liquidation of Rhodium Encore LLC and its Affiliated Debtors (Docket No. 1298)
- B. Disclosure Statement for Joint Chapter 11 Plan of Liquidation of Rhodium Encore LLC and its Affiliated Debtors (Docket No. 1751)
- C. Disclosure Statement for First Amended Joint Chapter 11 Plan of Liquidation of Rhodium Encore LLC and its Affiliated Debtors (Docket No. 1822)
- D. Notice of Filing the Redlined Versions of the Amended Joint Plan of Liquidation and Disclosure Statement (Docket No. 1823)
- E. Disclosure Statement for First Amended Joint Chapter 11 Plan of Liquidation of Rhodium Encore LLC and Its Affiliated Debtors (Docket No. 1832)
- F. Notice of Filing of Liquidation Analysis Related to the Disclosure Statement for the Joint Chapter 11 Plan of Liquidation of Rhodium Encore LLC and Its Affiliated Debtors (Docket No. 1813)
- G. Order (A) Conditionally Approving the Adequacy of the Disclosure Statement; (B) Approving the Solicitation Procedures and Solicitation Packages; (C) Scheduling Combined Hearing; (D) Establishing Procedures for Objecting to the Plan and Final Approval of the Disclosure Statement; (E) Approving the Form, Manner, and Sufficiency of Notice of the Combined Hearing; and (F) Granting Related Relief (Docket No. 1834)

Certificates of Service

- A. Affidavit of Publication Re: Notice of Combined Hearing to Consider Final Approval of the Disclosure Statement and Confirmation of Plan Held on December 3, 2025, at 9:30 a.m. (Prevailing Central Time) (Docket No. 1961)
- B. Certificate of Service filed by Kurtzman Carson Consultants LLC dba Verita Global for the Solicitation Packages (Docket No. 1984)
- C. Supplemental Certificate of Service filed by Kurtzman Carson Consultants LLC dba Verita Global for the Notice of Combined Hearing to Consider Final Approval of the Disclosure Statement and Confirmation of Plan Held on December 3, 2025, at 9:30 a.m. (Prevailing Central Time) (Docket No. 2003)

- D. Certificate of Service re 1) Notice of Filing Plan Supplement for First Amended Joint Chapter 11 Plan of Liquidation for Rhodium Encore LLC and Its Affiliated Debtors Proposed by Debtors and Ad Hoc Group of SAFE Parties; 2) Notice of Hearing; and 3) Barnes & Thornburg LLP's Fourteenth Monthly Fee Statement for the Period October 1, 2025, Through October 31, 2025 (Docket No. 2053)

Witness and Exhibit Lists

- A. Witness List, Exhibit List (Filed By Lehotsky Keller Cohn LLP) (Docket No. 2065)
- B. Exhibit List, Witness List (Filed By Caleb VanZooeren) (Docket No. 2073)
- C. Witness List, Exhibit List (Filed By GR Fairbairn Family Trust, GRF Tiger Trust, Grant Fairbairn Revocable Trust, NC Fairbairn Family Trust, NCF Eagle Trust, Nina Claire Fairbairn Revocable Trust, Transcend Partners Legend Fund LLC, Valley High LP) (Docket No. 2078)
- D. Joint Exhibit List for Hearings Scheduled For December 3, 2025, filed by the Plan Proponents (Docket Nos. 2077 and 2079-Redacted; Docket Nos. 2080, 2082, 2083, and 2084-Sealed)
- E. **Amended Joint Exhibit List for Hearings Scheduled for December 3, 2025 (Docket No. 2104-Redacted; Docket No. 2105-Sealed)**

Motions to Seal

- A. Motion to Seal Confidential Information Included on the Joint Exhibit List for Hearings Scheduled for December 3, 2025, and the Declaration of Mitchell P. Hurley in Support of Plan Confirmation Filed by Debtor Rhodium Encore LLC (Docket No. 2089)

**II. III. MOTION TO ENFORCE**

- A. Motion to Enforce the Purchase and Sale Agreement with Whinstone US, Inc. filed by the Debtors and the Special Committee (Docket No. 1881)
- B. Certificate of Service of Motion to Enforce (Docket No. 1959)
- C. Certificate of No Objection to Motion to Enforce the Purchase and Sale Agreement with Whinstone US, Inc. (Docket No. 2000)
- D. Notice of Hearing on Certificate of No Objection to Motion to Enforce the Purchase and Sale Agreement with Whinstone US, Inc. (Docket No. 2004)
- E. Declaration of Mark Christopher Wheeler (Docket No. 2090)

Respectfully submitted this 3rd day of December, 2025.

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By: /s/ Patricia B. Tomasco

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**CERTIFICATE OF SERVICE**

I, Patricia B. Tomasco, hereby certify that on the 3rd day of December, 2025, a copy of the foregoing Amended Agenda 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