### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	§	Chapter 11
RHODIUM ENCORE LLC, et al., 1	§ §	Case No. 24-90448 (ARP)
	§	,
Debtors.	§ 8	(Jointly Administered)
	§ §	(Johnty Administered)

# APPELLEE'S DESIGNATION OF ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL

Pursuant to Federal Rule of Bankruptcy Procedure 8009, Rhodium Encore LLC and its affiliates, as debtors and debtors in possession (collectively, the "Debtors" or "Rhodium") hereby designates the following additional items to be included in the record in connection with the appeals filed by Midas Green Technologies LLC ("Midas" or "Appellant") 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.

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.



## **DESIGNATION OF RECORD**

Appellees designate 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	ECF	Description
8/29/2024	35	Declaration re: Declaration of David M. Dunn in Support of Chapter 11
		Petitions and First Day Relief (Filed By Rhodium Encore LLC).
9/18/2024		Proof of Claim filed by Midas.pdf
10/15/2024	269	Emergency Motion for Entry of an Order (I) Setting Bar Dates for Filing
		Proofs of Claim, (II) Approving the Form of Proofs of Claim and the
		Manner of Filing, (III) Approving Notice of Bar Dates, and (IV) Granting
		Related Relief Filed by Debtor Rhodium Encore LLC
10/16/2024	270	Proposed Order RE: Setting Bar Dates for Filing Proofs of Claim, (II)
		Approving the Form of Proofs of Claim and the Manner of Filing, (III)
		Approving Notice of Bar Dates, and (IV) Granting Related Relief (Filed By
		Rhodium Encore LLC)
10/18/2024	284	Order (I) Setting Bar Dates for Filing Proofs of Claim, (II) Approving the
		Form of Proofs of Claim and the Manner of Filing, (III) Approving Notice
		of Bar Dates, and (IV) Granting Related Relief, (Related Doc # 269) Signed
11/12/2024		on 10/18/2024. (abm4)
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
11/26/2024	509	Order (I) Authorizing the Sale of the Debtors' Temple Lease; and (II)
11/20/2021	307	Granting Related Relief, Signed on 11/26/2024
1/7/2025	611	Rhodium Motion Granting Limited Relief from Automatic Stay to Continue
		District Court Litigation (15526604_1).pdf
1/30/2025	737	Order Granting Limited Relief from Automatic Stay to Continue District
		Court Litigation
4/8/2025	921	Order (I) Approving Emergency Motion for a Settlement and Compromise
		Between Debtors and Whinstone US, Inc. Pursuant to Bankruptcy Rule
		9019; (II) Authorizing the Use, Sale, or Lease of Certain Property of the
		Debtors' Estate Pursuant to 11 U.S.C. § 363 and (III) Granting Related
		Relief, Signed on 4/8/2025

Date	ECF	Description
4/15/2025	0951	Debtors' Omnibus Objection to Claim Numbers 004, 062, and 068-072
		Filed by Midas Green Technologies LLC
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)
4/17/2025	0953	Debtors' Amended Omnibus Objection to Claim Numbers 004, 062, and
		068-072 Filed by Midas Green Technologies LLC Related Document(s):
		1963, 1962, 1878, 1794, 1793, 1757, 1711, 1698, 1602, 1526, more
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) Related
		Document(s): 1963, 1962, 1794, 1793, 1757, 1655, 1602, 1486, 1485, 1427,
		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)
		,
		Related Document(s): 1074, 1028, 0954
5/8/2025	1066	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) Related Document(s): 1070
5/8/2025	1069	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) Related Document(s): 1963, 1962, 1794, 1793, 1757, 1655, 1602,
		1486, 1485, 1427, more
5/9/2025	1070	Order for Admission Pro Hac Vice of Joseph E. Thomas (Thomas Whitelaw
		& Kolegraff LLP) to Represent Midas Green Technologies, LLC Related
		Document(s): 1072, 1066
5/12/2025	1074	Order Granting the Motion to Seal Debtors' Amended Omnibus Objection
		to Claim Numbers 004, 062, and 068-072 Filed by Midas Green
		Technologies LLC Related Document(s): 1130, 1104, 0955
5/20/2025	1130	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) Related Document(s): 1076, 1074
5/28/2025	1204	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,

Date	ECF	Description
		Rhodium Renewables LLC, Rhodium Renewables Sub LLC, Rhodium Shared Services LLC, Rhodium Technologies LLC) Related Document(s): 1226, 0954, 0953
7/7/2025	1413	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 Related Document(s): 1963, 1962, 1794, 1793, 1757, 1655, 1602, 1486, 1485, 1429, more
7/8/2025	1479	Hearing Transcript for July 8, 2025
7/8/2025	1422	Proposed Order Submission After Hearing (Filed By Rhodium Encore LLC).(Related document(s):953 Objection to Claim, 954 Sealed Document, 1069 Response, 1413 Reply)
7/9/2025	1427	Scheduling Order for Contested Matter, Signed on 7/9/2025 (Related document(s):953 Objection to Claim, 954 Sealed Document, 1069 Response, 1413 Reply)
7/29/2025	1483	[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) Related Document(s): 1757, 1655, 1535, 1487
7/29/2025	1484	[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) Related Document(s): 1757, 1534, 1487
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) Related Document(s): 1878, 1757, 1711, 1698, 1526, 1520, 1413, 1069, 0954, 0953
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) Related Document(s): 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) Related Document(s): 1566, 1520, 1484, 1483
8/12/2025	1521	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) Related Document(s): 1618
8/12/2025	1522	[Sealed Document] Opposition to Debtors Summary Judgment Motion in Support of Amended Omnibus Objection to Claim Numbers 004, 062, and

Date	ECF	Description
		068-072 (Filed by Midas Green Technologies, LLC) (No Image Available) Related Document(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) Related Document(s): 1757, 1655
8/13/2025	1526	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) Related Document(s): 1531, 1486, 1485, 0953
8/15/2025	1531	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) Related Document(s): 1526, 1524
8/19/2025	1534	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) Related Document(s): 1757, 1558, 1484
8/19/2025	1535	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) Related Document(s): 1757, 1483
8/21/2025	1558	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) Related Document(s): 1534, 1533
8/25/2025	1566	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 Related Document(s): 1582, 1573, 1487
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) Related Document(s): 1757, 1711, 1698, 1655
8/28/2025	1580	[Sealed] Motion for Leave to File to Amend Proof of Claims (Filed by Creditor Midas Green Technologies, LLC) (No Image Available) Related Document(s): 1698, 1695, 1672, 1596, 1581

Date	ECF	Description
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) Related Document(s): 1672, 1580
8/28/2025	1582	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) Related Document(s): 1566
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) Related Document(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) Related Document(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) Related Document(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 Related Document(s): 1630, 1521
9/9/2025	1625	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) Related Document(s): 1602
9/11/2025	1635	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) Related Document(s): 1609
9/12/2025	1641	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.) Related Document(s): 1652, 1609
9/17/2025	1652	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'

Date	ECF	Description
		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) Related Document(s): 1641, 1639
9/19/2025	1659	Exhibit List (Filed By Rhodium Encore LLC).
9/19/2025	1660	Sealed Exhibit List (Filed By Rhodium Encore LLC).
9/18/2025	1655	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 Bankruptcy Procedure for Abstention (Filed by Rhodium Encore LLC) Related Document(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) Related Document(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 Related Document(s): 1715, 1581, 1580
9/23/2025	1806	Hearing Transcript for September 23, 2025
9/23/2025	1695	Order Granting Midas Green Technologies LLC's Motion for Leave to Amend the Original Proof of Claims Related Document(s): 1717, 1580
9/24/2025	1719	Hearing Transcript for September 24, 2025
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
9/23/2025	1698	Courtroom Minutes. Time Hearing Held: 1:02 PM to 3:00 PM; 3:11 PM to 4:04 PM; 4:13 PM to 4:32 PM; 4:35 PM to 5:15 PM. Appearances: see log. Additional appearances: Joseph Thomas and Michael Smith. Witness(es) sworn and testified: Chase Blackmon, Charles Topping, and Dr. Al Ortega. Admitted exhibits: ECF Nos. 1660-12,1660-31, 1660-32, 1660-42 (demonstrative), 1660-38, 1660-39, 1660-41. Motion hearing held. Debtor makes an oral motion to exclude Midas Technologies LLC exhibits and witnesses. The Court enforced the rules of the Court and will exclude Midas Technologies LLC exhibits and witnesses. Oral argument heard. Motion 1580 is granted and entered on the record. This matter is continued to 9/24/2025 at 9:15 AM. ERO: yes. (Related document(s):953 Objection to Claim, 1485 Generic Motion, 1486 Motion For Summary Judgment, 1579 Motion for Withdrawal of Reference) Hearing scheduled for 9/24/2025 at 09:15 AM at Houston, Courtroom 400 (ARP)
9/24/2025	1705	Statement Slide Show re Direct Examination of Dr. Alfonso Ortega (Filed By Rhodium Encore LLC)

Date	ECF	Description
9/24/2025	1706	Statement Slide Show re: Midas Claim Objection Hearing (Filed by Rhodium Encore LLC) Related Document(s): 1698
9/24/2025	1711	Courtroom Minutes. Time Hearing Held: 9:15 AM to 11:00 AM; 11:16 AM to 11:33 AM; 11:34 AM to 12:06 PM. Appearances: see log. Additional appearances: Patricia "Patty" Tomasco, Rachel Harrington, Elizabeth Brannen, Chase Blackmon, Charles Topping, and Joseph Thomas. Motion hearing held. Oral argument heard on the record. Admitted exhibits: ECF Nos. 1660-4, 1660-5, 1660-13, 1660-14, 1660-19, 1660-20, 1660-22, 1660-23, 1660-24, and 1710 (for purposes of the record and not for the truth of the matter). Mr. Thomas is to file exhibits that were admitted from WDTX 6:22-cv-00050-ADA (ECF Nos. 154, 161, 187, 163 for the fact it was filed, not for the truth of the matter) and ECF No. 1522. Parties are to submit a short brief (no more than 10 pages) on the issues before the court. The Court will take motions 953, 1485, 1486, 1579 under advisement. The Court will hold motion 1602 in abeyance. ERO: yes. (Related document(s):953 Objection to Claim, 1485 Generic Motion, 1486 Motion for Summary Judgment, 1579 Motion for Withdrawal of Reference, 1602 Motion for Sanctions) (abh4) Modified on 9/24/2025 (abh4).
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	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) Related Document(s): 1856, 1655, 1579, 1535, 1534, 1523, 1522, 1486, 1485, 1484, more
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) Related Document(s): 1759
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) Related Document(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) Related Document(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) Related Document(s): 1986, 1963, 1807, 1413, 1069, 0954, 0953

Date	ECF	Description
10/28/2025	1878	Memorandum Opinion and Order on Debtors' Amended Omnibus
		Objection To Claim Numbers 004, 062, And 068–072 and Debtors'
		Motion To Estimate
10/28/2025	1878	Rhodium BK Ct Memorandum Opinion and Order on Debtors' Omnibus
		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
10/28/2025	1879	Order Sustaining Debtors' Amended Omnibus Objection to Claim
		Numbers 004, 062, and 068-072 and Estimating Midas Green's Claims
		Related Document(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 Related
		Document(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
11/4/2025	1062	and Supporting Exhibits Related Document(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) Related Document(s): 1793, 1413, 1069, 0954, 0953
11/4/2025	1963	Midas Green Technologies, LLC's Opposition to Debtors' Motion for
11/4/2023	1703	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) Related
		Document(s): 1794, 1413, 1069, 0954, 0953
11/11/2025	1983	Notice of Appeal
11/11/2025	1983	Midas Green Technologies, LLC's Notice of Appeal [Appellant
		Designation due by 11/25/2025] Related Document(s): 1988, 1879, 1878
11/12/2025	1986	Order Abating Motions for Sanctions, Signed on 11/12/2025 (Related
		document(s):1793 Motion for Sanctions, 1794 Motion for Sanctions)
11/12/2025	1988	Clerk's Notice of Filing of an Appeal. On 11/11/2025, Midas Green
		Technologies, LLC filed a notice of appeal. The appeal has been
		assigned to U.S. District Judge George C Hanks, Jr, Civil Action
		25cv5413. Parties notified (Related document(s):[1983] Notice of
		Appeal) (hl4)
11/25/2025	2045	Statement of Issues on Appeal
11/30/2025	2062	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
	1486-2	'457 Patent
	1486-3	'446 Patent
	1486-	'450 Patent
	17	

Respectfully submitted this 9th day of December, 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

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#### - and -

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#### - and -

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Counsel to the Debtors and Debtors-In-Possession

## **Certificate of Service**

I, Patricia B. Tomasco, hereby certify that on the 9th day of December, 2025, a copy of the foregoing 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. Tomas