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

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RHODIUM ENCORE LLC, et al.,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-90448 (ARP)

(Jointly Administered)

### AGENDA OF MATTERS SET FOR HEARING ON AUGUST 30, 2024, AT 10:00 A.M.

Rhodium Encore LLC and its affiliated debtors and debtors in possession (collectively, the

"Debtors") hereby file their Agenda of Matters Set for Hearing on August 30, 2024, at 10:00 a.m.

(prevailing Central Time) before the Honorable Alfredo R. Perez.

## **RESOLVED MATTERS**

1. Debtors' Supplemental Emergency Motion for an Order (I) Directing Joint Administration of Chapter 11 Cases; and (II) Granting Related Relief (ECF No. 31)

Status: An Order has been entered. No hearing is required.

- A. Declaration of David M. Dunn in Support of Chapter 11 Petitions and First Day Relief (ECF No. 35)
- B. Debtors' Emergency Motion for an Order (I) Directing Joint Administration of Chapter 11 Cases; and (II) Granting Related Relief (ECF No. 5) (this was filed on behalf of the first 6 Debtors that filed on August 24, 2024)

<sup>&</sup>lt;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.



- C. Order (I) Directing Joint Administration of Chapter 11 Cases; and (II) Granting Related Relief (ECF No. 8) (this is the Order granting ECF No. 5 for the first 6 Debtors)
- D. Order (I) Directing Joint Administration of Chapter 11 Cases; and (II) Granting Related Relief (ECF No. 41)
- 2. Emergency *Ex Parte* Application for Entry of an Order Authorizing the Employment and Retention of Kurtzman Carson Consultants, LLC DBA Verita Global as Claims, Noticing, and Solicitation Agent (ECF No. 33)
  - Status: An Order has been entered. No hearing is required.

Related Documents:

- A. Declaration of David M. Dunn in Support of Chapter 11 Petitions and First Day Relief (ECF No. 35)
- B. Order Authorizing the Employment and Retention of Kurtzman Carson Consultants, LLC dba Verita Global as Claims, Noticing, and Solicitation Agent (ECF No. 43)

## MATTERS GOING FORWARD

3. Emergency Motion of Debtors for Entry of an Order (I) Authorizing Debtors to (A) File a Consolidated Creditor Matrix and a Consolidated List of 30 Largest Unsecured Creditors and (B) Redact Certain Personal Identification Information; and (II) Approving Form and Manner of Notifying Creditors of Commencement of Chapter 11 Cases and Other Information (ECF No. 39)

Status: This matter is going forward.

Related Documents:

- A. Declaration of David M. Dunn in Support of Chapter 11 Petitions and First Day Relief (ECF No. 35)
- 4. Debtors' Emergency Motion for an Order (I) Extending the Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, Statements of Financial Affairs, and Rule 2015.3 Financial Reports, and (II) Granting Related Relief (ECF No. 40)
  - Status: This matter is going forward.

- A. Declaration of David M. Dunn in Support of Chapter 11 Petitions and First Day Relief (ECF No. 35)
- 5. Emergency Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue Insurance Programs, and (B) Pay Certain Obligations with Respect Thereto; (II) Granting Automatic Stay with Respect to Workers' Compensation Claims; and (III) Granting Related Relief (ECF No. 34)
  - Status: This matter is going forward.

Related Documents:

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- A. Declaration of David M. Dunn in Support of Chapter 11 Petitions and First Day Relief (ECF No. 35)
- 6. Emergency Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue Their Existing Cash Management System, (B) Honor Certain Pre-Petition Obligations Related Thereto, and (C) Continue to Perform Intercompany Transactions, (II) Granting Superpriority Administrative Expenses Status to Post-Petition Intercompany Balances, and (III) Granting Related Relief (ECF No. 36)

Status: This matter is going forward.

Related Documents:

- A. Declaration of David M. Dunn in Support of Chapter 11 Petitions and First Day Relief (ECF No. 35)
- 7. Emergency Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors' Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief (ECF No. 37)
  - Status: This matter is going forward.

- A. Declaration of David M. Dunn in Support of Chapter 11 Petitions and First Day Relief (ECF No. 35)
- B. Notice of Filing of Exhibit A to the Emergency Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors' Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (Granting Related Relief (ECF No. 44)

8. Emergency Motion of Debtors for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Postpetition Financing, (B) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (C) Modifying the Automatic Stay, (D) Scheduling a Final Hearing, and (E) Granting Related Relief (ECF No. 38)

Status: This matter is going forward.

Related Documents:

- A. Declaration of David M. Dunn in Support of Chapter 11 Petitions and First Day Relief (ECF No. 35)
- B. Declaration of Michael Robinson in Support of Emergency Motion of Debtors for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Postpetition Financing, (B) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (C) Modifying the Automatic Stay, (D) Scheduling a Final Hearing, and (E) Granting Related Relief (ECF No. 42)
- C. Notice of Filing of Exhibits to Emergency Motion of Debtors for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Postpetition Financing, (B) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (C) Modifying the Automatic Stay, (D) Scheduling a Final Hearing, and (E) Granting Related Relief (ECF No. 57)

## MATTERS GOING FORWARD AS A STATUS CONFERENCE

9. Debtors' Motion to Assume Certain Executory Contracts with Whinstone US, Inc (ECF No. 7)

Status: This matter is going forward as a status conference.

- A. Declaration of David M. Dunn in Support of Chapter 11 Petitions and First Day Relief (ECF No. 35)
- B. Notice of Status Conference (ECF No. 20)
- C. Debtors' Supplemental Motion to Assume Certain Executory Contracts with Whinstone US, Inc. (ECF No. 32)

Respectfully submitted this 29<sup>th</sup> day of August, 2024.

# QUINN EMANUEL URQUHART & SULLIVAN, LLP

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Proposed Counsel to the Debtors and Debtors-In-Possession

### **CERTIFICATE OF SERVICE**

I, Patricia B. Tomasco, hereby certify that on August 29, 2024, a copy of the foregoing Agenda was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

<u>/s/ Patricia B. Tomasco</u> Patricia B. Tomasco