

**ENTERED**

October 18, 2024

Nathan Ochsner, Clerk

**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)
	§	

**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  
(Relates to ECF No. 269)**

Upon the motion (the “Motion”), of the above-captioned debtors (collectively, the “Debtors”), for entry of an order (the “Bar Date Order”) (a) establishing the General Bar Date; (b) establishing the Governmental Bar Date; (c) establishing the Rejection Damages Bar Date; (d) establishing the Amended Schedules Bar Date; (e) approving notice of the Bar Dates; and (f) granting related relief, all as more fully set forth in the Motion; and this Court having jurisdiction to decide the Motion and to enter this Bar Date Order pursuant to 28 U.S.C. § 1334; and consideration of the Motion being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided, such notice being adequate and appropriate under the circumstances; and after notice and a hearing, as defined in section 102 of the Bankruptcy Code;

<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.



and this Court having determined that the legal and factual bases set forth in the Motion and in the record establish just cause for entry of this Order; and it appearing that entry of this Order is in the best interests of the Debtors' estates; it is hereby ORDERED that:

**I. THE BAR DATES**

1. Each entity<sup>2</sup> that asserts a claim against any of the Debtors that arose before the Petition Date shall be required to file an original, written proof of claim (a "Proof of Claim"), on Official Form 410 substantially in the form attached to this Order as **Exhibit 1** (the "Proof of Claim Form") or electronically on the Claims Agent website at <https://www.veritaglobal.net/rhodium/>.

2. Except in the cases of governmental units and certain other exceptions explicitly set forth herein, **November 22, 2024, at 5:00 p.m. (Prevailing Central Time)** (the "General Bar Date") is the deadline for each entity to file a Proof of Claim for any prepetition claim other than a claim that is governed by a more specific Bar Date set forth below or that is exempt from filing a Proof of Claim pursuant to the Bar Date Order.

3. Except in the case of exceptions explicitly set forth herein, **February 20, 2025, at 5:00 p.m. (Prevailing Central Time)** (the "Governmental Bar Date") is the deadline for all governmental units to file a Proof of Claim for any prepetition claim (whether secured, unsecured priority, or unsecured non-priority), and including claims for unpaid taxes, whether such claims arise from prepetition tax years or periods or prepetition transactions to which any of the Debtors

---

<sup>2</sup> Except as otherwise defined in this Order or in the Motion, all terms specifically defined in the Bankruptcy Code shall have those meanings ascribed to them by the Bankruptcy Code. In particular, as used herein: (a) the term "claim" has the meaning given to it in section 101(5) of the Bankruptcy Code; (b) the term "entity" (including individuals, partnerships, corporations, joint ventures, and trusts) has the meaning given to it in section 101(15) of the Bankruptcy Code; (c) the term "governmental unit" has the meaning given to it in section 101(27) of the Bankruptcy Code; and (d) the term "person" has the meaning given to it in section 101(41) of the Bankruptcy Code.

were a party, other than a claim that is governed by a more specific Bar Date set forth below or that is exempt from filing a Proof of Claim pursuant to the Bar Date Order.

4. Unless otherwise ordered, all entities asserting claims arising from the Debtors' rejection of executory contracts or unexpired leases shall file a Proof of Claim on account of such rejection by the later of (a) the General Bar Date or the Governmental Bar Date, as applicable, and (b) 5:00 p.m., prevailing Central Time, on the date that is 30 days following entry of the order approving the Debtors' rejection of the applicable executory contract or unexpired lease (the "Rejection Damages Bar Date").

5. If any of the Debtors amend their schedules of assets and liabilities (the "Schedules") after having given notice of the Bar Dates (as defined herein), the deadline for any entity adversely affected by the amendment, which has not then filed a proof of claim, to file a proof of claim for any prepetition claim (including any request for payment under section 503(b)(9) of the Bankruptcy Code) whose subject matter is related to the amendment, shall be the later of (i) the General Bar Date or the Governmental Bar Date, as applicable, and (ii) **5:00 p.m. (Prevailing Central Time)** on the date that is 30 days from the date on which the Debtors provide notice of the amendment (such later date, the "Amended Schedules Bar Date" and, together with the General Bar Date, the Governmental Bar Date, and the Rejection Damages Bar Date, as applicable, the "Bar Date" or "Bar Dates").

6. All Proofs of Claim must be filed or submitted so as to be *actually received* by the Claims and Noticing Agent on or before the applicable Bar Date. If Proofs of Claim are not received by the Claims and Noticing Agent on or before the applicable Bar Date, except in the case of certain exceptions explicitly set forth herein, the holders of the underlying claims shall be barred from asserting such claims against the Debtors and precluded from voting on any plans of

reorganization filed in these chapter 11 cases and/or receiving distributions from the applicable Debtor on account of such claims in these chapter 11 cases.

7. The Bar Dates established by this Bar Date Order supersede any bar dates established, filed, noticed, or previously served in these Chapter 11 Cases.

## **II. PROOFS OF CLAIM**

### **A. Who Must File**

8. The following categories of claimants, in the capacities described below, shall be required to file a Proof of Claim by the Bar Date:

- a. any entity whose claim against a Debtor is not listed in the applicable Debtor's Schedules;
- b. any entity whose claim against a Debtor is listed as contingent, unliquidated, or disputed in the applicable Debtor's Schedules;
- c. any entity that desires to have its claim allowed in a different classification or amount from the classification or identified in the applicable Debtor's Schedules;
- d. any entity that desires to have its claim allowed against a Debtor other than the Debtor on whose Schedules its claim is identified; and
- e. any present or former officer, manager, director, employee, or independent contractor whose claim relates to any severance under an agreement that arose prior to the Petition Date or relates to any grievance that arose prior to the Petition Date (including for wrongful termination, discrimination, harassment, hostile work environment, or retaliation).

9. The following categories of claimants, in the capacities described below, shall not be required to file a Proof of Claim by the Bar Date:

- a. the U.S. Trustee, on account of claims for fees payable pursuant to 28 U.S.C. § 1930;
- b. any entity that has already filed a signed proof of claim against the applicable Debtor with the Claims Agent on a form substantially similar to Official Form 410;
- c. any entity whose claim is listed on the Schedules if (i) the claim is *not* scheduled by the Debtors as disputed, contingent, or unliquidated; (ii) the

entity agrees with the amount, nature, and priority of the claim as set forth in the Schedules; and (iii) the entity does not dispute that its claim is an obligation only of the specific Debtor on whose Schedules the claim is listed;

- d. any entity whose claim has already been allowed by a final order of this Court;
- e. any Debtor having a claim against another Debtor;
- f. any entity whose claim is solely against a non-Debtor (including a non-Debtor that is an affiliate of a Debtor);
- g. any entity whose claim has been paid in full by a Debtor pursuant to the Bankruptcy Code or in accordance with a Court order;
- h. a person who is or was an officer, manager, director, employee or independent contractor of the Debtors on or after the Petition Date, if an order of this Court authorizes the Debtors to honor its claim in the ordinary course of business as wages, commissions, benefits or severance; *provided* that (i) such a person must file a timely proof of claim as to any other claim that arose before the Petition Date (including for wrongful termination, discrimination, harassment, hostile work environment or retaliation) and (ii) such person must file a timely proof of claim as to any claim that cannot be paid pursuant to section 503(c) of the Bankruptcy Code;
- i. any current officer, manager, director, or employee of the Debtors for claims based on indemnification, contribution, or reimbursement; *provided* that if, at any time prior to the effective date of a chapter 11 plan or closing of the Chapter 11 Cases, any such person is no longer an officer, manager, director, or employee of the Debtors, then such person shall be required to file a proof of claim within 30 days after the date when he or she is no longer an officer, manager, director, or employee;
- j. any entity holding a claim for which a separate deadline is fixed by this Court;
- k. any entity holding a claim that the Court exempts from filing a proof of claim, including pursuant to the *Final Order (I) Authorizing the Debtors to Obtain Secured Superpriority Postpetition Financing, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief* (ECF

No. 186) (the “DIP Order”);

- l. any entity holding a claim for fees, expenses, or other obligations arising or payable under the DIP Order; and
- m. any entity holding a claim that is allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an actual, necessary cost or expense of preserving the Debtors’ estates, to the extent of the administrative claim.

**B. Procedures for Filing**

10. The following requirements shall apply with respect to filing and preparing each

Proof of Claim:

- a. *Form.* Each proof of claim must be filed with the Clerk of the Bankruptcy Court on Official Form 410 in substantially the form attached as Exhibit 1 or filed electronically on the Claims Agent website at <https://www.veritaglobal.net/rhodium/>.
- b. *Signatures.* Only **original** proof of claim are acceptable for purposes of claims administration. Each proof of claim must be signed—in ink for a physical proof of claim or by electronic signature for an electronic proof of claim—by the claimant or by an authorized agent or legal representative of the claimant on the claimant’s behalf.
- c. *Contents.* Each proof of claim must be written or printed in legible English. Any liquidated claim amount that is asserted must be denominated in U.S. dollars. Each proof of claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and 3001(d), except that, with written consent of Debtors’ counsel, a proof of claim may include a summary of voluminous documentation. To the extent that voluminous documentation is summarized, the claimant shall transmit such documentation to counsel to the Debtors or any other party in interest within 5 business days upon request.
- d. *Identification of Debtor.* Each proof of claim must clearly identify one specific Debtor against which it is asserted, including the specific Debtor’s case number. A proof of claim that is filed without specifying a particular Debtor, or that is filed under the lead case number (No. 24-90448 ), or that is filed against multiple Debtors will be deemed as filed only against Rhodium Encore, LLC.
- e. *Delivery.* Each proof of claim must be filed, including supporting documentation through one of the following methods: (i) by the Claims Agent’s electronic filing system at <https://www.veritaglobal.net/rhodium/>; (ii) by first class mail, overnight mail, or hand delivery, to the following

address: Rhodium Claims Processing Center, c/o KCC dba Verita, 222 N. Pacific Coast Hwy., Ste. 300, El Segundo, CA 90245; (iii) by first class mail, overnight mail, or hand delivery, to the following address: United States Bankruptcy Court, P.O. Box 3900, Houston, Texas 77002; or (iv) by electronically filing through Pacer at <https://ecf.txsb.uscourts.gov>. Proofs of claim submitted by fax or email will not be accepted. Claimants who deliver a physical proof of claim to the Claims Agent or the United States Bankruptcy Court and wish to receive acknowledgement of the submission must also deliver to the Claims Agent or the Clerk a copy of the Proof of Claim Form (in addition to the original Proof of Claim Form) and a self-addressed stamped envelope.

- f. *Timing.* Each proof of claim must be delivered in the foregoing manner so that the proof of claim is **actually received** by the Claims Agent or the Clerk of the Court on or before the applicable Bar Date.

### **C. Consequences of Failing to File**

11. Any person or entity that fails to file a timely proof of claim that is required by the Bar Date Order shall be barred, estopped and enjoined from asserting its claim against the Debtors or their estates (and from filing or amending a proof of claim to assert such a claim), and the Debtors and their property and estates shall be discharged from any indebtedness or liability with respect to or arising from such a claim. Such a person or entity shall also be prohibited from voting to accept or reject any plan of reorganization in these Chapter 11 Cases on account of such a claim or participating in any distribution in these Chapter 11 Cases on account of such a claim, and shall not be entitled to receive further notices on account of such a claim. Such a person or entity shall not be treated as a creditor with respect to such a claim for any purpose in these Chapter 11 Cases.

## **III. NOTICE PROCEDURES**

### **A. Mailing of Bar Date Notices**

12. Pursuant to Bankruptcy Rule 2002(a)(7), the Debtors shall cause written notice of the Bar Dates to be mailed via first-class mail to the entities listed below (or their respective counsel, if known). The notice will be in substantially the form attached to the Bar Date Order as

Exhibit 2 (the “Bar Date Notice”) and will be accompanied by a Proof of Claim Form (together, the “Bar Date Package”).

- a. the U.S. Trustee;
- b. counsel or proposed counsel to any statutory committee appointed in these Chapter 11 Cases;
- c. Orrick, Herrington & Sutcliffe LLP, as counsel to the Administrative Agent of the Senior Secured Superpriority Debtor-in-Possession Lenders;
- d. all creditors and other known holders of claims or purported claims against the Debtors as of the date of entry of the Bar Date Order, including all entities listed in the Schedules as holding claims against the Debtors;
- e. all entities that have requested notice of proceedings in these Chapter 11 Cases pursuant to Bankruptcy Rule 2002, as of the date of entry of the Bar Date Order;
- f. all entities that have filed proofs of claim in these Chapter 11 Cases as of the date of the entry of the Bar Date Order;
- g. all known non-Debtor equity holders or interest holders of the Debtors as of the date of entry of the Bar Date Order;
- h. all entities that are party to executory contracts or unexpired leases with the Debtors;
- i. all entities that are party to active litigation with the Debtors;
- j. all current and former employees (to the extent that contact information for former employees is available in the Debtors’ records);
- k. all regulatory authorities that regulate the Debtors’ businesses;
- l. the attorney general for the State of Texas and each other state in which the Debtors conduct business;
- m. the Office of the U.S. Attorney for the Southern District of Texas;
- n. the District Director of the Internal Revenue Service for the Southern District of Texas;
- o. all other taxing authorities for the jurisdictions in which the Debtors maintain or conduct business; and
- p. all other entities listed on the Debtors’ matrix of creditors.



13. The Debtors shall provide each Scheduled creditor with a personalized Proof of Claim Form that sets forth (a) which Debtor the creditor's claim has been Scheduled against, (b) the Scheduled amount of the claim, if any, (c) whether the claim is Scheduled as contingent, unliquidated, or disputed, and (d) whether the claim is Scheduled as secured, unsecured priority, or unsecured non-priority. However, the Debtors' failure to provide any creditor with a personalized Proof of Claim shall not excuse that creditor from filing a proof of claim, if required by the Bar Date Order. Each creditor that receives a personalized Proof of Claim Form may correct any information that it believes is missing, incorrect, or incomplete.

**B. Supplemental Mailings**

14. After the initial mailing of the Bar Date Package, the Debtors may, in their discretion, make supplemental mailings of notices, including in the event that: (a) notices are returned by the post office with forwarding addresses;<sup>3</sup> (b) certain parties acting on behalf of parties in interest (*e.g.*, banks and brokers) decline to distribute notices to these parties and instead return their names and addresses to the Debtors for direct mailing; and (c) additional potential claimants or parties in interest become known to the Debtors. In this regard, the Debtors are permitted to make supplemental mailings of the Bar Date Package in these and similar circumstances at any time up to 14 days in advance of the applicable Bar Date, with any such mailings being deemed timely and the Bar Date being applicable to the recipient creditors.

**C. Publication Notice**

15. The Debtors shall cause notice of the General Bar Date and the Governmental Bar Date to be given by publication to creditors to whom notice by mail is impracticable, including

---

<sup>3</sup> To the extent that any notices are returned as "return to sender" without a forwarding address, the Debtors request that they not be required to mail additional notices to such persons and that publication notice be deemed sufficient as to them.

creditors who are unknown or not reasonably ascertainable by the Debtors and creditors whose identities are known but whose addresses are unknown by the Debtors. Specifically, the Debtors shall cause the Bar Date Notice to be published as soon as reasonably practicable after entry of the Bar Date Order and in accordance with Bankruptcy Rule 2002(l), modified for publication in substantially the form attached hereto as Exhibit 3 (the “Publication Notice”), on one occasion in *The New York Times* (National Edition) and *Houston Chronicle* and any such other local publications that the Debtors deem appropriate and disclose in the Claims Agent’s affidavit of service.

#### IV. MISCELLANEOUS ORDERS

16. Notwithstanding any provision of the Bankruptcy Rules or Local Rules, the terms of this Order shall be immediately effective and enforceable upon its entry.

17. The Debtors and their agents are authorized to take all steps necessary or appropriate to carry out this Order.

18. This Court shall retain jurisdiction over all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Signed: October 18, 2024

  
Alfredo R Pérez  
United States Bankruptcy Judge

**EXHIBIT 1**  
**PROOF OF CLAIM FORM**

United States Bankruptcy Court for the Southern District of Texas, Houston Division

Indicate Debtor against which you assert a claim by checking the appropriate box below. **(Check only one Debtor per claim form.)**

- Rhodium Encore LLC. (Case No. 24-90448)
- Jordan HPC LLC (Case No. 24-90448)
- Rhodium JV LLC (Case No. 24-90448)
- Rhodium 2.0 LLC (Case No. 24-90448)
- Rhodium 10MW LLC (Case No. 24-90448)
- Rhodium 30MW LLC (Case No. 24-90448)
- Rhodium Enterprises, Inc. (Case No. 24-90448)
- Rhodium Technologies LLC (Case No. 24-90448)
- Rhodium Renewables LLC (Case No. 24-90448)
- Air HPC LLC (Case No. 24-90448)
- Rhodium Shared Services LLC (Case No. 24-90448)
- Rhodium Ready Ventures LLC (Case No. 24-90448)
- Rhodium Industries LLC (Case No. 24-90448)
- Rhodium Encore Sub LLC (Case No. 24-90448)
- Jordan HP Sub LLC (Case No. 24-90448)
- Rhodium 2.0 Sub LLC (Case No. 24-90448)
- Rhodium 10MW Sub LLC (Case No. 24-90448)
- Rhodium 30MW Sub LLC (Case No. 24-90448)
- Rhodium Renewables Sub LLC (Case No. 24-90448)

# Official Form 410 Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Other than a claim under 11 U.S.C. § 503(b)(9), this form should not be used to make a claim for an administrative expense arising after the commencement of the case.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed.

**Part 1: Identify the Claim**

<b>1. Who is the current creditor?</b>	Name of the current creditor (the person or entity to be paid for this claim) _____  Other names the creditor used with the debtor _____	
<b>2. Has this claim been acquired from someone else?</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
<b>3. Where should notices and payments to the creditor be sent?</b>	<b>Where should notices to the creditor be sent?</b>  Name _____  Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)  Number _____ Street _____  City _____ State _____ ZIP Code _____  Country _____  Contact phone _____  Contact email _____	<b>Where should payments to the creditor be sent? (if different)</b>  Name _____  Number _____ Street _____  City _____ State _____ ZIP Code _____  Country _____  Contact phone _____  Contact email _____  Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____
<b>4. Does this claim amend one already filed?</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
<b>5. Do you know if anyone else has filed a proof of claim for this claim?</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6. Do you have any number you use to identify the debtor?  No  
 Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: \_\_\_\_\_

7. How much is the claim? \$ \_\_\_\_\_ Does this amount include interest or other charges?  
 No  
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.  
 Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).  
 Limit disclosing information that is entitled to privacy, such as health care information.  
 \_\_\_\_\_

9. Is all or part of the claim secured?  No  
 Yes. The claim is secured by a lien on property.  
**Nature of property:**  
 Real estate: If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.  
 Motor vehicle  
 Other. Describe: \_\_\_\_\_  
**Basis for perfection:** \_\_\_\_\_  
 Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)  
**Value of property:** \$ \_\_\_\_\_  
**Amount of the claim that is secured:** \$ \_\_\_\_\_  
**Amount of the claim that is unsecured:** \$ \_\_\_\_\_ (The sum of the secured and unsecured amount should match the amount in line 7.)  
**Amount necessary to cure any default as of the date of the petition:** \$ \_\_\_\_\_  
**Annual Interest Rate** (when case was filed) \_\_\_\_\_ %  
 Fixed  
 Variable

10. Is this claim based on a lease?  No  
 Yes. Amount necessary to cure any default as of the date of the petition. \$ \_\_\_\_\_

11. Is this claim subject to a right of setoff?  No  
 Yes. Identify the property: \_\_\_\_\_

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

No

Yes. Check all that apply:

Amount entitled to priority

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

\$ \_\_\_\_\_

Up to \$3,350\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ \_\_\_\_\_

Wages, salaries, or commissions (up to \$15,150\* earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ \_\_\_\_\_

Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ \_\_\_\_\_

Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ \_\_\_\_\_

Other. Specify subsection of 11 U.S.C. § 507(a)(\_\_) that applies.

\$ \_\_\_\_\_

\* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?

No

Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

\$ \_\_\_\_\_

**Part 3: Sign Below**

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

I am the creditor.

I am the creditor's attorney or authorized agent.

I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date \_\_\_\_\_  
MM / DD / YYYY

Signature \_\_\_\_\_

**Print the name of the person who is completing and signing this claim:**

Name \_\_\_\_\_  
First name Middle name Last name

Title \_\_\_\_\_

Company \_\_\_\_\_  
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address \_\_\_\_\_  
Number Street

City State ZIP Code Country

Contact phone \_\_\_\_\_ Email \_\_\_\_\_

**Official Form 410****Instructions for Proof of Claim**

United States Bankruptcy Court

12/15

These instructions and definitions generally explain the law. In certain circumstances, such as bankruptcy cases that debtors do not file voluntarily, exceptions to these general rules may apply. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the bankruptcy process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.  
18 U.S.C. §§ 152, 157 and 3571

**PLEASE SEND COMPLETED PROOF(S) OF CLAIM TO:**

Rhodium Claims Processing Center  
c/o KCC dba Verita  
222 N. Pacific Coast Hwy., Ste. 300  
El Segundo, CA 90245

**How to fill out this form**

- **Fill in all of the information about the claim as of the date the case was filed.**
- **Fill in the caption at the top of the form**
- **If the claim has been acquired from someone else, then state the identity of the last party** who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- **Attach any supporting documents to this form.**  
Attach redacted copies of any documents that show that the debt exists, a lien secures the debt, or both. (See the definition of *redaction* on the next page.)  
Also attach redacted copies of any documents that show perfection of any security interest or any assignments or transfers of the debt. In addition to the documents, a summary may be added. Federal Rule of Bankruptcy Procedure (called “Bankruptcy Rule”) 3001(c) and (d).
- **Do not attach original documents because attachments may be destroyed after scanning.**
- **If the claim is based on delivery health care goods or services, do not disclose confidential health care information. Leave out or redact confidential information both in the claim and in the attached documents.**

Alternatively, your claim can be filed electronically on KCC’s website at <https://www.veritaglobal.net/rhodium>.

- **A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, individual’s tax identification number, or financial account number, and only the year of any person’s date of birth.** See Bankruptcy Rule 9037.
- **For a minor child, fill in only the child’s initials and the full name and address of the child’s parent or guardian.**  
For example, write *A.B., a minor child (John Doe, parent, 123 Main St., City, State)*. See Bankruptcy Rule 9037.

**Confirmation that the claim has been filed**

To receive confirmation that the claim has been filed, either enclose a stamped self-addressed envelope and a copy of this form or you may view a list of filed claims in this case by visiting the Claims and Noticing and Agent’s website at <https://www.veritaglobal.net/rhodium>.

**Understand the terms used in this form**

**Administrative expense:** Generally, an expense that arises after a bankruptcy case is filed in connection with operating, liquidating, or distributing that bankruptcy estate.  
11 U.S.C. § 503

**Claim:** A creditor’s right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

**Claim Pursuant to 11 U.S.C. §503(b)(9):** A claim arising from the value of any goods received by the Debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of the Debtor's business. Attach documentation supporting such claim.

**Creditor:** A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. §101 (10).

**Debtor:** A person, corporation, or other entity to who is in bankruptcy. Use the debtor's name and case number as shown in the bankruptcy notice you received. 11 U.S.C. §101 (13).

**Evidence of perfection:** Evidence of perfection of a security interest may include documents showing that a security interest has been filed or recorded, such as a mortgage, lien, certificate of title, or financing statement.

**Information that is entitled to privacy:** A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

**Priority claim:** A claim within a category of unsecured claims that is entitled to priority under 11 U.S.C. §507(a). These claims are paid from the available money or property in a bankruptcy case before other unsecured claims are paid. Common priority unsecured claims include alimony, child support, taxes, and certain unpaid wages.

**Proof of claim:** A form that shows the amount of debt the debtor owed to a creditor on the date of the bankruptcy filing. The form must be filed in the district where the case is pending.

**Redaction of information:** Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

**Do not file these instructions with your form.**

**Secured claim under 11 U.S.C. §506(a):** A claim backed by a lien on particular property of the debtor. A claim is secured to the extent that a creditor has the right to be paid from the property before other creditors are paid. The amount of a secured claim usually cannot be more than the value of the particular property on which the creditor has a lien. Any amount owed to a creditor that is more than the value of the property normally may be an unsecured claim. But exceptions exist; for example, see 11 U.S.C. § 1322(b) and the final sentence of 1325(a).

Examples of liens on property include a mortgage on real estate a security interest in a car. A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In states, a court judgment may be a lien.

**Setoff:** Occurs when a creditor pays itself with money belonging to the debtor that it is holding, or by canceling a debt it owes to the debtor.

**Uniform claim identifier:** An optional 24-character identifier that some creditors use to facilitate electronic payment.

**Unsecured claim:** A claim that does not meet the requirements of a secured claim. A claim may be unsecured in part to the extent that the amount of the claim is more than the value of the property on which a creditor has a lien.

### **Offers to purchase a claim**

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.



**EXHIBIT 2**

**BAR DATE NOTICE**

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

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

**NOTICE OF DEADLINES  
FOR THE FILING OF PROOFS OF CLAIM**

**To all persons and entities who may have claims against any of the following Debtor entities:**

DEBTOR	CASE NO.
Rhodium Encore LLC	24-90448
Jordan HPC LLC	24-90449
Rhodium JV LLC	24-90450
Rhodium 2.0 LLC	24-90451
Rhodium 10MW LLC	24-90452
Rhodium 30MW LLC	24-90453

---

<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.

DEBTOR	CASE NO.
Rhodium Enterprises, Inc.	24-90454
Rhodium Technologies LLC	24-90455
Rhodium Renewables LLC	24-90456
Air HPC LLC	24-90457
Rhodium Shared Services LLC	24-90458
Rhodium Ready Ventures LLC	24-90459
Rhodium Industries LLC	24-90460
Rhodium Encore Sub LLC	24-90461
Jordan HPC Sub LLC	24-90462
Rhodium 2.0 Sub LLC	24-90463
Rhodium 10MW Sub LLC	24-90464
Rhodium 30MW Sub LLC	24-90465
Rhodium Renewables Sub LLC	24-90466

**PLEASE TAKE NOTICE THAT:**

On August 24, 2024 and August 29, 2024 (the “Petition Date”), Rhodium Encore, LLC and certain of its affiliates, as debtors and debtors in possession (collectively, the “Debtors”), each filed a voluntary petition for relief under title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Texas (the “Court”).

On [•], 2024 the Court entered an order [ECF No. [•]] (the “Bar Date Order”)<sup>2</sup> establishing certain dates by which parties holding prepetition claims against the Debtors must file proofs of claim (“Proofs of Claim”).

For your convenience, enclosed with this notice (this “Notice”) is a Proof of Claim form, which identifies on its face the amount, nature, and classification of your claim(s), if any, listed in the Debtors’ schedules of assets and liabilities filed in these cases (the “Schedules”). If the Debtors believe that you hold claims against more than one Debtor, you will receive multiple Proof of Claim forms, each of which will reflect the nature and amount of your claim as listed in the Schedules.

As used in this Notice, the term “entity” has the meaning given to it in section 101(15) of the Bankruptcy Code, and includes all persons, estates, trusts, governmental units, and the Office of the United States Trustee for the Southern District of Texas. In addition, the terms “persons”

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Bar Date Order.

and “governmental units” are defined in sections 101(41) and 101(27) of the Bankruptcy Code, respectively.

As used in this Notice, the term “claim” means, as to or against the Debtors and in accordance with section 101(5) of the Bankruptcy Code: (a) any right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

## I. THE BAR DATES

1. The Bar Date Order establishes the following bar dates for filing Proofs of Claim in these Chapter 11 Cases (the “Bar Dates”):

- a. *General Bar Date.* Pursuant to the Bar Date Order, except as described below, all entities (except governmental units) holding claims against the Debtors that arose or are deemed to have arisen prior to the commencement of these cases on the Petition Date **are required to file Proofs of Claim by November 22, 2024, at 5:00 p.m. (Prevailing Central Time)**. Except as expressly set forth in this Notice and the Bar Date Order, the General Bar Date applies to all types of claims against the Debtors that arose prior to the Petition Date, including secured claims, unsecured priority claims, and unsecured non-priority claims.
- b. *Governmental Bar Date.* Pursuant to the Bar Date Order, all governmental units holding claims against the Debtors that arose or are deemed to have arisen prior to the commencement of these cases on the Petition Date **are required to file Proofs of Claim by the Governmental Bar Date of February 20, 2025, at 5:00 p.m. (Prevailing Central Time)**. The Governmental Bar Date applies to all governmental units holding claims against the Debtors (whether secured, unsecured priority, or unsecured non-priority) that arose prior to the Petition Date, including governmental units with claims against the Debtors for unpaid taxes, whether such claims arise from prepetition tax years or periods or prepetition transactions to which the Debtors were a party.
- c. *Rejection Damages Bar Date.* Pursuant to the Bar Date Order, all entities holding claims arising from the Debtors’ rejection of executory contracts or unexpired leases are required to file Proofs of Claim by the Rejection Damages Bar Date, **(i.e., by the date that is the later of (i) the General Bar Date or the Governmental Bar Date, as applicable, and (ii) 5:00 p.m., Prevailing Central Time, on the date that is 30 days following**

**entry of the order approving the rejection of the applicable executory contract or unexpired lease of the Debtors).**

- d. *Amended Schedules Bar Date.* Pursuant to the Bar Date Order, all entities holding claims affected by the amendment to the Debtors' Schedules are required to file Proofs of Claim by the Amended Schedules Bar Date (**i.e., by the date that is the later of (i) the General Bar Date or the Governmental Bar Date, as applicable, and (ii) 5:00 p.m., Prevailing Central Time, on the date that is 30 days from the date on which the Debtors provide notice of the amendment to the Schedules).**)

**The Bar Dates established by the Bar Date Order and referenced in this notice supersede any Bar Dates established, filed, noticed, or previously served in these Chapter 11 Cases.**

## **II. WHO MUST FILE A PROOF OF CLAIM**

2. Except as otherwise set forth herein, the following entities holding claims against the Debtors that arose (or that are deemed to have arisen) prior to the Petition Date *must* file Proofs of Claim on or before the General Bar Date, the Governmental Bar Date, or any other applicable bar date set forth in the Bar Date Order, as applicable:

- a. any entity whose claim against a Debtor is not listed in the applicable Debtor's Schedules;
- b. any entity whose claim against a Debtor is listed as contingent, unliquidated, or disputed in the applicable Debtor's Schedules;
- c. any entity that desires to have its claim allowed in a different classification or amount from the classification or identified in the applicable Debtor's Schedules;
- d. any entity that desires to have its claim allowed against a Debtor other than the Debtor on whose Schedules its claim is identified; and
- e. any present or former officer, manager, director, employee or independent contractor whose claim relates to any severance under an agreement that arose prior to the Petition Date or relates to any grievance that arose prior to the Petition Date (including for wrongful termination, discrimination, harassment, hostile work environment or retaliation).

## **III. PARTIES WHO DO NOT NEED TO FILE PROOFS OF CLAIM BY THE GENERAL BAR DATE**

3. Certain parties are not required to file Proofs of Claim. The Court may, however, enter one or more separate orders at a later time requiring creditors to file Proofs of Claim for some kinds of the following claims and setting related deadlines. If the Court does enter such an order,

you will receive notice of it. The following entities holding claims that would otherwise be subject to the Bar Dates, in the capacities described below, need **not** file Proofs of Claims:

- a. the U.S. Trustee, on account of claims for fees payable pursuant to 28 U.S.C. § 1930;
- b. any entity that has already filed a signed proof of claim against the applicable Debtor with the Claims Agent on a form substantially similar to Official Form 410;
- c. any entity whose claim is listed on the Schedules if (i) the claim is **not** scheduled by the Debtors as disputed, contingent, or unliquidated; (ii) the entity agrees with the amount, nature, and priority of the claim as set forth in the Schedules; and (iii) the entity does not dispute that its claim is an obligation only of the specific Debtor on whose Schedules the claim is listed;
- d. any entity whose claim has already been allowed by a final order of the Court;
- e. any Debtor having a claim against another Debtor;
- f. any entity whose claim is solely against a non-Debtor (including a non-Debtor that is an affiliate of a Debtor);
- g. any entity whose claim has been paid in full by a Debtor pursuant to the Bankruptcy Code or in accordance with a Court order;
- h. a person who is or was an officer, manager, director, employee or independent contractor of the Debtors on or after the Petition Date, if an order of the Court authorizes the Debtors to honor its claim in the ordinary course of business as wages, commissions, benefits or severance; *provided* that (i) such a person must file a timely proof of claim as to any other claim that arose before the Petition Date (including for wrongful termination, discrimination, harassment, hostile work environment or retaliation) and (ii) such person must file a timely proof of claim as to any claim that cannot be paid pursuant to section 503(c) of the Bankruptcy Code;
- i. any current officer, manager, director, or employee for claims based on indemnification, contribution, or reimbursement; *provided* that if, at any time prior to the effective date of a chapter 11 plan or closing of the Chapter 11 Cases, any such person is no longer an officer, manager, director, or employee of the Debtors, then such person shall be required to file a proof

- of claim within 30 days after the date when he or she is no longer an officer, manager, director, or employee;
- j. any entity holding a claim for which a separate deadline is fixed by the Court;
  - k. any entity holding a claim that the Court exempts from filing a proof of claim, including pursuant to the *Final Order (I) Authorizing the Debtors to Obtain Secured Superpriority Postpetition Financing, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief* (ECF No. 186) (the “DIP Order”), which may (but are not required to) file master proofs of claim in accordance with paragraph 28 of the DIP Order;
  - l. any entity holding a claim for fees, expenses, or other obligations arising or payable under the DIP Order; and
  - m. any entity holding a claim that is allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an actual, necessary cost or expense of preserving the Debtors’ estates, to the extent of the administrative claim.

#### IV. INSTRUCTIONS FOR FILING PROOFS OF CLAIM

4. The following requirements shall apply with respect to filing and preparing each Proof of Claim.

- a. *Form.* Each proof of claim must be filed with the Clerk of the Bankruptcy Court on Official Form 410 in substantially the form attached as **Exhibit 1** to the Bar Date Order (the “Proof of Claim Form”) or filed electronically on the Claims Agent website at <https://www.veritaglobal.net/rhodium/>.
- b. *Signatures.* Only **original** proofs of claim are acceptable for purposes of claims administration. Each proof of claim must be signed—in ink for a physical proof of claim or by electronic signature for an electronic proof of claim—by the claimant or by an authorized agent or legal representative of the claimant on the claimant’s behalf.
- c. *Contents.* Each proof of claim must be written or printed in legible English. Any liquidated claim amount that is asserted must be denominated in U.S. dollars. Each proof of claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and 3001(d), except that, with written consent of Debtors’ counsel, a proof of claim may include a summary of voluminous documentation. To the extent that voluminous documentation is summarized, the claimant shall transmit such documentation to counsel to the Debtors or any other party in interest within 5 business days upon request.
- d. *Identification of Debtor.* Each proof of claim must clearly identify one specific Debtor against which it is asserted, including the specific Debtor’s

case number. A proof of claim that is filed without specifying a particular Debtor, or that is filed under the lead case number (No. 24-90448), or that is filed against multiple Debtors will be deemed as filed only against Rhodium Encore LLC.

- e. *Delivery.* Each proof of claim must be filed, including supporting documentation, through one of the following methods: (i) by the Claims Agent's electronic filing system at <https://www.veritaglobal.net/rhodium>; (ii) by first class mail, overnight mail, or hand delivery, to the following address: Rhodium Claims Processing Center, c/o KCC dba Verita, 222 N. Pacific Coast Hwy., Ste. 300, El Segundo, CA 90245; (iii) by first class mail, overnight mail, or hand delivery, to the following address: United States Bankruptcy Court, P.O. Box 3900, Houston, Texas 77002; or (iv) by electronically filing through Pacer at <https://ecf.txsb.uscourts.gov>. Proofs of claim submitted by fax or email will not be accepted. Claimants who deliver a physical proof of claim to the Claims Agent or the United States Bankruptcy Court and wish to receive acknowledgement of the submission must also deliver to the Claims Agent or the Clerk a copy of the Proof of Claim Form (in addition to the original Proof of Claim Form) and a self-addressed stamped envelope.
- f. *Timing.* Each proof of claim must be delivered in the foregoing manner so that the proof of claim is **actually received** by the Claims Agent or the Clerk of the Court on or before the applicable Bar Date.

## V. CONSEQUENCES OF FAILING TO TIMELY FILE YOUR PROOF OF CLAIM

5. Pursuant to the Bar Date Order and in accordance with Bankruptcy Rule 3003(c)(2), **if you are required to file a Proof of Claim but fail to file a timely Proof of Claim in accordance with the Bar Date Order with respect to any claim:**

- a. **you will be forever barred, estopped and enjoined from asserting your claim against the Debtors (or filing a Proof of Claim with respect to your claim);**
- b. **the Debtors and their property will be forever discharged from any and all indebtedness or liability with respect to or arising from your claim;**
- c. **you will not receive any distribution in these Chapter 11 Cases on account of your claim; and**
- d. **you will not be permitted to vote on any plan or plans of reorganization an account of your claim, and you may not receive further notices regarding the Chapter 11 Cases.**



## **VI. RESERVATION OF RIGHTS**

6. Nothing contained in this Notice is intended to or should be construed as a waiver of the Debtors' right to (a) dispute, or asset offsets or defenses against, any filed claim or any claim listed or reflected in the Schedules as to the nature, amount, liability, or classification thereof; (b) subsequently designate any scheduled claim as disputed, contingent, or unliquidated; and (c) otherwise amend or supplement the Schedules.

## **VII. THE DEBTORS' SCHEDULES**

7. You may be listed as the holder of a claim against one or more of the Debtor entities in the Debtors' Schedules. To determine if and how you are listed on the Schedules, please refer to the descriptions set forth on the enclosed Proof of Claim forms regarding the nature, amount, and status of your claim(s), if any. If the Debtors believe that you may hold claims against more than one Debtor entity, you will receive multiple Proof of Claim forms, each of which will reflect the nature and amount of your claim against one Debtor entity, as listed in the Schedules.

8. If you rely on the Debtors' Schedules, it is your responsibility to determine that the claim is accurately listed in the Schedules. However, you may rely on the enclosed form, which: (a) sets forth the amount of your claim (if any) as scheduled; (b) identifies the Debtor entity against which it is scheduled; (c) specifies whether your claim is listed in the Schedules as disputed, contingent, unliquidated; and (d) identifies whether your claim is scheduled as a secured, unsecured priority, or unsecured non-priority claim.

9. As described above, if you agree with the nature, amount, and status of your claim as listed in the Debtors' Schedules, and if you do not dispute that your claim is only against the Debtor entity specified by the Debtors, and if your claim is not described as "disputed," "contingent," or "unliquidated," you need not file a Proof of Claim. Otherwise, or if you decide to file a Proof of Claim, you must do so before the applicable Bar Date in accordance with the procedures set forth in this Notice.

## **VIII. ADDITIONAL INFORMATION**

10. Copies of the Debtors' Schedules, the Bar Date Order, and other information regarding these Chapter 11 Cases are available for inspection free of charge on the Debtors' website at <https://www.veritaglobal.net/rhodium/>. The Schedules and other filings in these Chapter 11 Cases also are available for a fee at the Court's website at <https://ecf.txsb.uscourts.gov/>. A login identification and password to the Court's Public Access to Court Electronic Records ("PACER") are required to access this information and can be obtained through the PACER Service Center at <http://www.pacer.psc.uscourts.gov>. Copies of the Schedules and other documents filed in these cases may also be examined between the hours of 8:00 a.m. and 5:00 p.m., Prevailing Central Time, Monday through Friday, at the office of the Clerk of the Bankruptcy Court, United States Bankruptcy Court for the Southern District of Texas, 515 Rusk Avenue, 5<sup>th</sup> Floor, Houston, Texas 77002.

11. If you require additional information regarding the filing of a Proof of Claim, you may contact the Debtors' restructuring hotline at 888-733-1541 (U.S./Canada toll-free) or +1-310-

751-2637 (International) or submit an inquiry online at <http://www.veritaglobal.net/rhodium/inquiry>.

**A HOLDER OF A POSSIBLE CLAIM AGAINST THE DEBTORS SHOULD CONSULT AN ATTORNEY REGARDING ANY MATTERS NOT COVERED BY THIS NOTICE, SUCH AS WHETHER THE HOLDER SHOULD FILE A PROOF OF CLAIM.**

Dated: October [●], 2024.

**QUINN EMANUEL URQUHART &  
SULLIVAN, LLP**

/s/ [DRAFT]

Patricia B. Tomasco (SBN 01797600)

Joanna D. Caytas (SBN 24127230)

Cameron Kelly (SBN 24120936)

Alain Jaquet (*pro hac vice*)

700 Louisiana Street, Suite 3900

Houston, Texas 77002

Telephone: 713-221-7000

Facsimile: 713-221-7100

Email: [pattytomasco@quinnemanuel.com](mailto:pattytomasco@quinnemanuel.com)

Email: [joannacaytas@quinnemanuel.com](mailto:joannacaytas@quinnemanuel.com)

Email: [cameronkelly@quinnemanuel.com](mailto:cameronkelly@quinnemanuel.com)

Email: [alainjaquet@quinnemanuel.com](mailto:alainjaquet@quinnemanuel.com)

- and -

Eric Winston (*pro hac vice*)

Razmig Izakelian (*pro hac vice*)

865 S. Figueroa Street, 10th Floor

Los Angeles, California 90017

Telephone: 213-443-3000

Facsimile: 213-443-3100

Email: [ericwinston@quinnemanuel.com](mailto:ericwinston@quinnemanuel.com)

Email: [razmigizakelian@quinnemanuel.com](mailto:razmigizakelian@quinnemanuel.com)

*Counsel to the Debtors and  
Debtors-In-Possession*