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

In re:	§	Chapter 11
	§	
	§	Case No. 24-90448 (ARP)
RHODIUM ENCORE LLC, *et al.*,[1]	§	
Debtors.	§	(Jointly Administered)
	§	
	§	**Re: Docket No. 2327 & 2370**

CERTIFICATE OF NO OBJECTION AND NOTICE OF FILING OF REVISED PROPOSED ORDER FOR FINAL APPLICATION OF MCDERMOTT WILL & SCHULTE LLP AS COUNSEL TO THE COMMITTEE OF UNSECURED CREDITORS

Pursuant to the *Procedures for Complex Cases in the Southern District of Texas*, the undersigned counsel for the Official Committee of Unsecured Creditors (the "Committee") of Rhodium Encore LLC, *et al.* certifies as follows:

1. On March 2, 2026, the Committee, by and through its undersigned counsel, filed the *Twelfth and Thirteenth Monthly and Final Application of McDermott Will & Schulte LLP as Counsel to the Official Committee of Unsecured Creditors for (I) the Monthly Period from November 1, 2025 through November 30, 2025 (II) the Monthly Period from December 1, 2025 through December 19, 2025 and (III) the Final Period From November 23, 2024 through December 19, 2025* [Docket No. 2327] (the "Application"). The deadline for parties to file responses to the relief requested in the Application was March 23, 2026 (the "Objection Deadline"). No objection to the relief requested in the Application was received, either formally or informally, by the Objection Deadline.

[1] 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.

2. On March 20, 2026, the Wind Down Debtor and McDermott Will & Schulte LLP ("McDermott," and with the Wind Down Debtor, the "Parties") entered into the *Stipulation Between the Wind Down Debtor and McDermott Will & Schulte LLP* extending the Objection Deadline solely as to the Wind Down Debtor to April 22, 2026.

3. On April 22, 2026, the Wind Down Debtor and McDermott entered into the *Second Stipulation Between the Wind Down Debtor and McDermott Will and Schulte LLP* [Docket No. 2370] further extending the Objection Deadline solely as to the Wind Down Debtor to May 13, 2026.

4. To resolve any potential responses or objections on behalf of the Wind Down Debtor, McDermott has agreed to reduce the amount requested in the Application by $50,000 as reflected in the attached revised proposed order.

5. Undersigned counsel for the Committee respectfully requests that the Court enter the attached proposed order at its earliest convenience.

Dated: June 5, 2026
Dallas, Texas

MCDERMOTT WILL & SCHULTE LLP

/s/ Charles R. Gibbs

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Counsel to the Official Committee of Unsecured Creditors

CERTIFICATE OF SERVICE

I certify that on June 5, 2026, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Gibbs
Charles R. Gibbs

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
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In re:	§	Chapter 11
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	§	Case No. 24-90448 (ARP)
RHODIUM ENCORE LLC, *et al.*,[1]	§	
Debtors.	§	(Jointly Administered)
	§	
	§	**Re: Docket No. 2327 & 2370**

ORDER GRANTING TWELFTH AND THIRTEENTH MONTHLY AND FINAL APPLICATION OF MCDERMOTT WILL & SCHULTE LLP AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR (I) THE MONTHLY PERIOD FROM NOVEMBER 1, 2025 THROUGH NOVEMBER 30, 2025 (II) THE MONTHLY PERIOD FROM DECEMBER 1, 2025 THROUGH DECEMBER 19, 2025 AND (III) THE FINAL PERIOD FROM NOVEMBER 23, 2024 THROUGH DECEMBER 19, 2025
(Docket No. 2327)

The Court has considered the *Twelfth and Thirteenth Monthly, and Final Application of McDermott Will & Schulte LLP for Compensation for Services and Reimbursement of Expenses as Counsel to the Official Committee of Unsecured Creditors for (I) the Monthly Period from November 1, 2025 Through November 30, 2025, (II) the Monthly Period from December 1, 2025 Through December 19, 2025, and (III) the Final Period from November 23, 2024 Through December 19, 2025* [Docket No. 2327] (the "Application") filed by *McDermott Will & Schulte LLP* (the "Applicant"). The Court orders:

[1] 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.

1. Applicant is allowed compensation and reimbursement of fees and expenses in the amount of $4,591,296.11 for the period set forth in the Application.

2. The Wind Down Debtor is authorized to disburse any unpaid amounts allowed by paragraph 1 of this Order.

Dated: _____, 2026

_____
Alfredo R. Pérez
UNITED STATES BANKRUPTCY JUDGE