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

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

**FOURTH STIPULATION BETWEEN THE WIND DOWN DEBTOR AND TEMPLE GREEN DATA, LLC**

**[Relates to Dkt. Nos. 2197, 2247, 2298, 2331, 2346 and 2379]**

The Wind Down Debtor[2] and Temple Green Data, LLC ("Temple Green", and with the Wind Down Debtor, the "Parties"), by and through their undersigned counsel, hereby stipulate and agree as set for below in this stipulation (the "Stipulation").

## RECITALS

1. On December 24, 2025, this Court entered its *Order (I) Setting Bar Date for Filing Proofs of Administrative Expense Claims and (II) Approving Notice of the Administrative Expense Claims Bare Date and the Plan Effective Date, and (III) Granting Related Relief* [Dkt. No. 2197] (the "Administrative Claims Order"). The Administrative Claims Order states that (i) the deadline for any entity to file a Proof of Administrative Claim is 5:00 p.m. (prevailing Central Time) on the 30th day following the Effective Date of the Plan; and (ii) objections to such Proof of

[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) (collectively, the "Debtors").

[2] The term "Wind Down Debtor," when used herein, refers to Rhodium Enterprises, Inc.

Administrative Claim, if any, must be filed and served (as more clearly mandated within the Administrative Claims Order) no later than 60 days after the Effective Date.

2. On January 14, 2026, the Debtors and the Ad Hoc Group of SAFE Parties filed the *Notice of (I) Effective Date of Debtors' Second Amended Joint Chapter 11 Plan of Reorganization and (II) Bar Dates for Certain Claims* (the "Notice of Effective Date"). The Notice of Effective Date provides that the Debtors' Plan[3] became effective on January 14, 2026 (the "Effective Date").

3. As a result of the Effective Date, and pursuant to the Administrative Claims Order, the deadline for any entity to file a Proof of Administrative Claim was February 13, 2026, at 5:00 p.m. (prevailing central time). In turn, objections to such Proof of Administrative Claim, if any, must be filed and served, pursuant to the Administrative Claims Order, no later than Monday, March 16, 2026.[4]

4. On February 12, 2026, Temple Green filed its *Temple Green Data, LLC's Application for Administrative Expense Claim* [Dkt. No. 2298] seeking an administrative expense claim in an amount not less than $2,685,187.33 (the "Application").

5. On March 4, 2026, the Parties filed their *Stipulation Between the Wind Down Debtor and Temple Green Data, LLC* [Dkt. No. 2331] (the "First Stipulation") stipulating to Monday, March 16, 2026 as the deadline to file an objection or any other response to the Application.

6. On March 12, 2026, the Parties filed their *Second Stipulation Between the Wind Down Debtor and Temple Green Data, LLC* [Dkt. No. 2346] (the "Second Stipulation") stipulating

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[3] *Second Amended Joint Chapter 11 Plan of Liquidation for Rhodium Encore LLC and its Affiliated Debtors Pursuant to Chapter 11 of the Bankruptcy Code* [Dkt. No. 2062].

[4] The 60th day following the Effective Date falls on Sunday, March 15, 2026. Accordingly, and pursuant to Rule 9006(a)(1)(C) of the Federal Rule of Bankruptcy Procedure, the Objection Deadline falls on the next day business day: Monday, March 16, 2026.

to Friday, May 15, 2026 as the deadline to file an objection or any other response to the Application.

7. On May 12, 2026, the Parties filed their *Third Stipulation Between the Wind Down Debtor and Temple Green Data, LLC* [Dkt. No. 2379] (the "Third Stipulation") stipulating to Monday, June 15, 2026 as the deadline to file an objection or any other response to the Application.

**NOW, THEREFORE, IT IS HEREBY FURTHER STIPULATED AND AGREED AS FOLLOWS:**

1. Notwithstanding any contrary response deadline contained within the Application, the First Stipulation, the Second Stipulation, or the Third Stipulation, the Parties have agreed that the deadline to file an objection or any other response, including compulsory counterclaims if applicable, to the Application is extended to **Wednesday, July 15, 2026.**

**STIPULATED AND AGREED:**

*/s/ Chase J. Potter*
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