Docket #2412 Date Filed: 06/12/2026

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

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

SECOND STIPULATION BETWEEN THE WIND DOWN DEBTOR AND BARNES & THORNBURG LLP

[Relates to Dkt. Nos. 264, 2322 and 2353]

The Wind Down Debtor[2] and Barnes & Thornburg LLP ("B&T," and with the Wind Down Debtor, the "Parties"), by and through their undersigned counsel, hereby stipulate and agree as set forth below in this stipulation (the "Stipulation").

RECITALS

1. On October 14, 2024, this Court entered its *Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Dkt. No. 264] (the "Compensation Procedures Order"). The Compensation Procedures Order sets out the procedures for Interim and Final Fee Applications (as those terms are utilized within the Compensation Procedures Order).

[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.

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2. On February 27, 2026, B&T filed its *Fifth and Final Fee Application of Barnes & Thornburg LLP* [Dkt. No. 2322] seeking allowance and approval of certain compensation to B&T on an interim and final basis, and reimbursement of certain expenses (the "Application"). Utilizing the Court's negative notice procedures, the Application sets the deadline for any party to object or otherwise respond to the Application as Friday, March 20, 2026 – the 21st day after B&T's filing of the Application (the "Original Response Deadline").

3. On March 18, 2026, the Parties filed their *Stipulation Between the Wind Down Debtor and Barnes & Thornburg LLP* [Dkt. No. 2353] (the "First Stipulation"), stipulating to an extension of the Original Response Deadline, or any other contrary response deadline, to Thursday, June 18, 2026 (the "Extended Response Deadline").

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

1. Notwithstanding the Extended Response Deadline or any other contrary response deadline, the Parties have agreed that the Wind Down Debtor's deadline to file an objection or any other response to the Application is **Thursday, July 2, 2026.**

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