Docket #2416 Date Filed: 06/15/2026

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)

STIPULATION REGARDING EXTENDING THE OBJECTION DEADLINE TO RESPOND TO EATON ADMINISTRATIVE CLAIM

GXD Labs, LLC as plan administrator (the "**Plan Administrator**") for Rhodium Enterprises, Inc. as wind down debtor in the above-captioned chapter 11 cases (the "**Chapter 11 Cases**") of Rhodium Encore LLC and its affiliated debtors and debtors in possession (the "**Debtors**") and David Eaton ("**Mr. Eaton**"), in his capacity as a former director of Rhodium Enterprises, Inc. and as a former member of the Special Committee of Rhodium Enterprises' Board of Directors (the "**Special Committee**"), by and through their undersigned counsel, hereby stipulate and agree as set forth below.

RECITALS

WHEREAS, on December 19, 2025, the Court approved the *Second Amended Joint Chapter 11 Plan of Liquidation for Rhodium Encore LLC and its Affiliated Debtors Proposed by*

[1] 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), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), Rhodium Encore Sub LLC (1064), Rhodium Enterprises, Inc. (6290), Rhodium Industries LLC (4771), Rhodium Ready Ventures LLC (8618), Rhodium Renewables LLC (0748), Air HPC LLC (0387), Rhodium Renewables Sub LLC (9511), Rhodium Shared Services LLC (5868), and Rhodium Technologies LLC (3973). The mailing and service address of Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.

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Debtors and Ad Hoc Group of SAFE Parties [Docket No. 2062] (the "**Plan**"),[2] and

WHEREAS, on December 24, 2025, the Court entered the *Order (I) Setting Bar Date for Filing Proofs of Administrative Expense Claims and (II) Approving Notice of the Administrative Expense Claims Bar Date and the Plan Effective Date, and (III) Granting Related Relief* [Docket No. 2197] (the "**Administrative Claim Bar Date Order**"), and

WHEREAS, on January 14, 2026, the Plan went effective (the "**Effective Date**") and the Court entered the *Notice of (I) Effective Date of Debtors' Second Amended Joint Chapter 11 Plan of Reorganization and (II) Bar Dates for Certain Claims* [Docket No. 2247], and

WHEREAS, the Administrative Claim Bar Date Order provides that objections to proofs of administrative expense claims must be served no later than 60 days after the Effective Date of the Plan, or March 16, 2026 (the "**Objection Deadline**"),[3] and

WHEREAS, on February 10, 2026, Mr. Eaton timely filed his *Proof of Administrative Claim or, in the Alternative, Claim for Damages Relating to Rejection of Indemnification and Other Obligations, Asserted by David Eaton* [Docket No. 2292] (the "**Eaton Administrative Claim**"), and

WHEREAS, on February 23, 2026, the parties agreed to extend the Objection Deadline to June 15, 2026, and

WHEREAS, the Plan Administrator has requested and Mr. Eaton has agreed to further extend the Objection Deadline as to the Eaton Administrative Claim.

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[2] *See Order Approving the Disclosure Statement For, and Confirming, Second Amended Joint Chapter 11 Plan of Liquidation for Rhodium Encore LLC and its Affiliated Debtors Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 2170].

[3] March 15, 2026, is sixty (60) days after the Plan's January 14, 2026, Effective Date. However, pursuant to Fed. R. Bankr. P. 9006(a)(1)(C), because that date falls on a Sunday, the deadline to object was March 16, 2026.

IT IS HEREBY STIPULATED AND AGREED,

1. The Objection Deadline to respond to the Eaton Administrative Claim shall be extended from June 15, 2026 to September 14, 2026.

STIPULATED AND AGREED:

Dated: June 15, 2026

AKIN GUMP STRAUSS HAUER & FELD LLP

By: */s/ Sarah Link Schultz*
Sarah Link Schultz (State Bar No. 24033047; S.D. Tex. 30555)
Elizabeth D. Scott (State Bar No. 24059699; S.D. Tex. 2255287)
2300 N. Field Street, Suite 1800
Dallas, TX 75201-2481
Telephone: (214) 969-2800
Email: sschultz@akingump.com
Email: edscott@akingump.com

- and -

Mitchell P. Hurley (admitted *pro hac vice*)
One Bryant Park
New York, NY 10036-6745
Telephone: (212) 872-1000
Email: mhurley@akingump.com

Counsel to the Plan Administrator

BAKER BOTTS L.L.P.

By: */s/ Travis A. McRoberts*
Thomas E. O'Brien (TX 24046543)
Travis A. McRoberts (TX 24088040)
2001 Ross Avenue, Suite 900
Dallas, Texas 75201-2980
Telephone: (214) 953-6500
Email: tom.obrien@bakerbotts.com
travis.mcroberts@bakerbotts.com

-and-

Matthew G. Sheridan (TX 24088404)
One Shell Plaza
910 Louisiana Street
Houston, Texas 77002
Telephone: (713) 229-1234
Email: matthew.sheridan@bakerbotts.com

Counsel to David Eaton