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

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

MOTION TO FILE UNDER SEAL EXHIBITS LISTED ON MIDAS GREEN TECHNOLOGIES LLC'S EXHIBIT AND WITNESS LIST

Midas Green Technologies, LLC, by and through its undersigned counsel, files this Motion to File Under Seal the Exhibits attached hereto described as:

(1) Exhibit 1002: 2026-05-05, Omnibus Order Regarding Pretrial Motions (Dkt. 192) – Under Seal, in Midas Green Technologies LLC v. Rhodium Enterprises, Inc., et al., Case No. 6:22-cv-00050-ADA;

(2) Exhibit 1003: 2023-12-22, Dr. Himanshu Pokharna Expert Witness Report in Accordance with Rule 26 – Under Seal, in Midas Green Technologies LLC v. Rhodium Enterprises, Inc., et al., Case No. 6:22-cv-00050-ADA;

(3) Exhibit 1004: 2022-11-21, Final Infringement Contentions – Under Seal, in Midas Green Technologies LLC v. Rhodium Enterprises, Inc., et al., Case No. 6:22-cv-00050-ADA;

(4) Exhibit 1005: 2023-03-15, Plaintiff's Supplemental Response to Interrogatory No. 10 – Under Seal, in Midas Green Technologies LLC v. Rhodium Enterprises, Inc., et al., Case No. 6:22-cv-00050-ADA; and respectfully states as follows:

I. RELIEF REQUESTED

Movant seeks entry of an order authorizing the filing and maintenance under seal of the Exhibits 1002; 1003, 1004 and 1005 listed on Midas Green Technologies LLC's Exhibit and

Witness List for the June 30, 2026 Evidentiary Hearing on the Motion(s) for Sanctions before this Court.

II. JURISDICTION

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.

2. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

3. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b).

III. FACTUAL BACKGROUND

4. The exhibits identified above were designated and treated as under seal in the related district court patent action identified on Midas's exhibit list. Based on the descriptions in the exhibit list, those exhibits include an expert report, infringement contentions, and interrogatory responses, which commonly contain nonpublic technical analyses, proprietary business information, litigation strategy, and other confidential commercial information. Midas seeks only to maintain the same confidentiality treatment in this Court that applied in the originating litigation.

5. Midas's request is narrowly tailored. Midas does not seek to seal its entire witness and exhibit list, the hearing as a whole, or exhibits not designated as under seal. Instead, Midas seeks sealing only as to those particular exhibits identified in the exhibit list as under seal, namely Exhibits 1002, 1003, 1004, and 1005, and only to the extent they are filed with the Court. The need to preserve the confidentiality of this information outweighs the public's interest in unrestricted access to the Exhibits.

6. To the extent feasible, Midas has limited its sealing request solely to the Exhibits 1002, 1003, 1004 and 1005 and does not seek to seal any broader portion of the record than necessary.

IV. BASIS FOR RELIEF

10. Bankruptcy courts possess the authority to protect confidential commercial information from public disclosure pursuant to section 107(b) of the Bankruptcy Code.

11. Section 107(b)(1) provides that, upon request of a party in interest, the court shall protect an entity with respect to trade secrets or confidential research, development, or commercial information.

12. The Exhibits contain confidential commercial information within the meaning of section 107(b) and should therefore be protected from public disclosure.

13. Sealing the Exhibits is narrowly tailored to protect sensitive information while preserving public access to the remainder of the record.

V. NOTICE

14. Notice of this Motion has been provided to all parties entitled to receive notice under the Bankruptcy Code, Bankruptcy Rules, Local Rules, and any applicable Court orders.

15. Movant submits that no further notice is required.

PRAYER

WHEREFORE, Movant respectfully requests that the Court enter an order:

A. Authorizing the Exhibits 1002, 1003, 1004 and 1005 listed on the Exhibit and Witness List to be filed and maintained under seal;

B. Directing the Clerk to restrict public access to the Exhibits; and

C. Granting such other and further relief as the Court deems just and proper

DATED: June 26, 2026

Respectfully submitted,
/s/ Joseph E. Thomas

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CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2026, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. The CM/ECF system will send notification of such filing to all counsel of record who are registered CM/ECF users.

I further certify that all participants in this case who are registered CM/ECF users will be served by the CM/ECF system pursuant to the Federal Rules of Civil Procedure and the Local Rules of this Court.

Dated: June 26, 2026

Respectfully submitted,

THOMAS WHITELAW & KOLEGRAFF LLP

By: /s/ Joseph E. Thomas
Joseph E. Thomas
Attorneys for Midas Green Technologies

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

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

ORDER GRANTING MOTION TO FILE UNDER SEAL EXHIBITS LISTED ON MIDAS GREEN TECHNOLOGIES LLC'S EXHIBIT AND WITNESS LIST

Upon consideration of the Motion To File Under Seal Exhibits Listed On Midas Green Technologies LLC's Exhibit and Witness List ("Motion"), the Court finds that:

Good cause exists to grant the requested relief under 11 U.S.C. § 107(b) and Federal Rule of Bankruptcy Procedure 9018 because Exhibits 1002, 1003, 1004, and 1005 contain confidential commercial information.

IT IS THEREFORE ORDERED THAT:

The Motion to Seal is GRANTED.

Midas Green Technologies LLC is authorized to file Exhibits 1002, 1003, 1004, and 1005 under seal:

The unredacted version of Exhibits 1002, 1003, 1004, and 1005 shall remain under seal and shall not be made available to anyone except:

(a) the Court;

(b) the United States Trustee;

(c) counsel to the Debtors; and

(d) any other party as may be ordered by the Court or agreed to in writing by Midas.

SIGNED this ___ day of _____, 2026.

ALFREDO R. PEREZ
UNITED STATES BANKRUPTCY JUDGE