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)

MIDAS GREEN TECHNOLOGIES, LLC'S WITNESS AND EXHIBIT LIST

Midas Green Technologies, Inc. ("Midas") submits this Witness and Exhibit List in support of the June 30, 2026 Evidentiary Hearing:

Main Case No.: 24-90448	Name of Debtor: Rhodium Encore LLC, et al
Adversary No:	Style of Adversary:
Witnesses: (provided on subsequent page)	
	Judge: Alfredo Perez
	Courtroom Deputy: Akeita House
	Hearing Date: June 30, 2026
	Hearing Time: 9:00 am CDT
	Party's Name: Midas Green Technologies LLC
	Attorney's Name: Joseph E. Thomas, William J. Kolegraff, Grant J. Thomas
	Attorney's Phone: 949-679-6400
	Nature of Proceedings: Motion(s) for Sanctions

2490448260626000000000002

WITNESSES

Midas Green Technologies LLC ("Midas") discloses the following witness list for the Hearing on Motion(s) for Sanctions to be heard on June 30, 2026.

Midas may also call any witnesses identified by another party, records custodians or like witnesses, and witnesses who may testify for impeachment or rebuttal.

Midas reserves the right to supplement or modify this disclosure, including but not limited to for the purposes of responding any Court order.

Witness	**Type**	**Will Call / May Call**
Himanshu Pokharna	Expert	Will Call
Charles Topping	Fact	Will Call
Jordan Pietzsch	Fact	Will Call

EXHIBITS

Midas may seek to admit or use the exhibits set out in the table below.

Midas may further seek to admit or use other exhibits for purposes of impeachment or rebuttal.

Midas may also seek to admit or use any pleading, hearing transcript, or other document filed with the Court in this action.

Midas reserves the right to supplement or modify this disclosure, including but not limited to for the purposes of correcting any unintentional omission or in response to any Court order.

Ex. #	**Description**	**Offered**	**Objection**	**Admitted/Not Admitted**	**Disposition**
1001	2024-04-09, BEFORE THE HONORABLE ALAN D ALBRIGHT PRETRIAL HEARING (via Zoom) (Midas Green Technologies LLC vs. Rhodium Enterprises, Inc., et al Case No. 6:22-cv-00050-ADA)				
1002	2026-05-05, OMNIBUS ORDER REGARDING PRETRIAL MOTIONS (Dkt. 192) – **UNDER SEAL** (Midas Green Technologies LLC vs. Rhodium Enterprises, Inc., et al Case No. 6:22-cv-00050-ADA)				
1003	2023-12-22, DR. HIMANSHU POKHARNA EXPERT WITNESS REPORT IN ACCORDANCE WITH RULE 26 -**UNDER SEAL** (Midas Green Technologies LLC vs. Rhodium Enterprises,				

Ex. #	Description	Offered	Objection	Admitted/Not Admitted	Disposition
	Inc., et al Case No. 6:22-cv-00050-ADA)				
1004	2022-11-21, FINAL INFRINGEMENT CONTENTIONS – **UNDER SEAL** (Midas Green Technologies LLC vs. Rhodium Enterprises, Inc., et al Case No. 6:22-cv-00050-ADA)				
1005	2023-03-15, PLAINTIFF'S SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 10 – **UNDER SEAL** (Midas Green Technologies LLC vs. Rhodium Enterprises, Inc., et al Case No. 6:22-cv-00050-ADA)				
1006	2024-02-06, VIDEOTAPED DEPOSITION OF: DR. HIMANSHU POKHARNA, Ph.D. (Midas Green Technologies LLC vs. Rhodium Enterprises, Inc., et al Case No. 6:22-cv-00050-ADA)				
1007	DECLARATION OF CHARLES R. TOPPING IN SUPPORT OF DEBTORS' MOTION FOR SANCTIONS RELATING TO CLAIM NUMBERS 004, 062, AND 068-072 FILED BY MIDAS GREEN TECHNOLOGIES LLC (ECF NO. 1602) AS DIRECTED BY THE COURT'S SEPTEMBER 5, 2025 SCHEDULING ORDER (ECF NO. 1609)				
1008	MIDAS GREEN TECHNOLOGIES, LLC'S				

Ex. #	Description	Offered	Objection	Admitted/Not Admitted	Disposition
	OBJECTIONS TO DEBTORS' DECLARATION OF CHARLES R. TOPPING IN SUPPORT OF DEBTORS' MOTION FOR SANCTIONS RELATING TO CLAIMS FILED BY MIDAS GREEN TECHNOLOGIES LLC (ECF No. 1641)				
1009	2026-06-24, DECLARATION OF JORDAN PIETZSCH IN SUPPORT OF REQUEST OF WIND DOWN DEBTOR TO GRANT SANCTIONS MOTIONS AGAINST MIDAS GREEN (Dkt. 2428)				
	Any exhibit necessary for impeachment and/or rebuttal purposes				
	Any exhibit identified or offered by any other party				
	Any document filed on the electronic docket in this action				

DATED: June 25, 2026

Respectfully submitted,
/s/ Joseph E. Thomas

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CERTIFICATE OF SERVICE

I hereby certify that on June 25, 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 25, 2026

Respectfully submitted,

THOMAS WHITELAW & KOLEGRAFF LLP

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

EXHIBIT 1001

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

MIDAS GREEN TECHNOLOGIES, LLC *
VS. *
RHODIUM ENTERPRISES, INC., ET AL. *

April 9, 2024

CIVIL ACTION NO. 6:22-CV-50

BEFORE THE HONORABLE ALAN D ALBRIGHT
PRETRIAL HEARING (via Zoom)

APPEARANCES:

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Proceedings recorded by mechanical stenography, transcript produced by computer-aided transcription.

09:33 (Hearing begins.)

09:33 DEPUTY CLERK: A civil action in Case 6:22-CV-50, Midas Green Technologies, LLC versus Rhodium Enterprises, Incorporated, et al. Case called for a pretrial conference.

09:33 THE COURT: If I could have announcements from counsel, please.

09:33 MR. SMITH: Your Honor, for plaintiff Midas Green, Michael Smith. And with me today are Mr. Joe Thomas, Mr. Bill Kolegraff, and Mr. Grant Thomas; and we're ready to proceed.

09:33 MR. UNDERWOOD: Good morning, Your Honor. Travis Underwood on behalf of the Rhodium defendants. With me is my law partner Melissa Smith. We also have from the Stris & Maher firm our lead counsel, Liz Brannen, along with two other members from her firm, Peter Brody and Sarah Rahimi; and we're ready to proceed.

09:34 THE COURT: With this group, I feel like I'm an honorary Eastern District of Texas judge. What an honor. If I could have only been picked to serve there.

09:34 I will take up first the motion to correct inventorship. And I'll hear argument on that, please.

09:34 Mr. Thomas, I think that's you, or Mr. Kolegraff. Okay.

09:34 MR. KOLEGRAFF: Good morning. This is William Kolegraff.

09:34 THE COURT: Good morning to you, sir.

09:34 MR. KOLEGRAFF: Yes. So this patent was originally issued with seven named inventors. However, during the process of preparing for this case for trial, we discovered that six of the inventors should not have been named. We provided a correction of inventorship document, which was sent to the Patent and Trademark Office about a year ago. We're still waiting to hear back from them.

09:35 So what we did is, in an abundance of caution, just in case we don't get this resolved by the PTO by the time trial starts, we've asked the Court to order the director of the office to correct the inventorship. So right here, we believe we've met our burden for clear and convincing evidence. Every one of the --

09:35 THE COURT: Does that mean I get to tell Kathi Vidal what to do, or is it someone else?

09:35 MR. KOLEGRAFF: Yes. You do. I could help draft that order for you.

09:35 (Laughter.)

09:35 MR. KOLEGRAFF: But we do believe we've met the burden for clear and convincing evidence. First of all, the package that we have duplicated for you in the filing is the exact package that we submitted to the Patent and Trademark Office, which meets all the statutory requirements. All the six inventors that are being removed have signed declarations that they agree that they should be removed from the patent.

09:35 The remaining inventor, Christopher Boyd, has agreed that he is the sole inventor. And Midas Technology, the assignee of all the rights in interest in the patent, has also agreed to this change. So we don't see any reason why this can't be allowed because there's clear and convincing evidence to remove these inventors.

09:36 Now, Rhodium does try to muddy the water and they bring up the names of two other people that they say may be inventors, Rainone and Christian Best. That really is irrelevant to this particular motion.

09:36 This motion is merely to remove six named inventors that were wrongly named on the patent, and if they believe others should be added, then they can take that up at a separate -- separate matter. And just as a point of interest, they don't have any standing to do

this anyway because they don't represent Rainone or Christian Best, as far as we know.

THE COURT: Okay. Response?

MS. BRANNEN: Good morning, Your Honor. Elizabeth Brannen from Stris & Maher on behalf of the Rhodium defendants.

I guess we really should have briefed the point about Ms. Vidal, who -- Director Vidal, who I remember fondly as Kathi Kelly Lutton, but the reason we think this Court should not tell her agency what to do:

First of all, I think they say in their reply, they expect the agency to rule soon anyway. So there is the chance that we can just see what the Patent Office does. But the reason I would ask the Court to deny the motion is that the correct inventorship is a disputed issue in our litigation.

We do contend that there are two omitted inventors, who they're not even trying to add. And we don't think the record that they've submitted to this Court even tries to meet their clear and convincing burden to prove that all six of the guys they say should come off actually didn't contribute.

You know, two of them, and we've cited examples in our brief, testified that they contributed

09:37 to conception of one or more aspects of the claimed
09:38 invention. So I don't -- if you grant the motion, we
09:38 don't believe you'd be correcting anything. We just
09:38 don't think they met their burden. And at this point,
09:38 it may be best to see what the agency does.
09:38 THE COURT: Anything else from the
09:38 plaintiffs?
09:38 MR. KOLEGRAFF: Yeah. Just on the issue
09:38 of disputes of inventorship, there is no dispute on the
09:38 removal of these six. Those six, all six, have agreed
09:38 to do this. All six have testified that they're not
09:38 inventors. All six have testified that they are
09:38 comfortable with, and believe it's correct, that
09:38 Christopher Boyd is the sole inventor.
09:38 That's all, Your Honor.
09:38 THE COURT: Anything else?
09:38 MS. BRANNEN: Your Honor, in our brief,
09:38 we cited testimony from two of them to the effect that
09:38 they contributed to conception, and so that would not
09:38 make it proper to remove them. We don't think they've
09:38 met the clear and convincing burden.
09:38 THE COURT: Okay. I'll be back in a
09:38 second.
09:38 (Pause in proceedings.)
09:43 THE COURT: Okay. I'm going to grant the

dismissal of the six; but with regard to the additional two, I'm not sure -- I'll hear from defendant. I'm not sure, procedurally, that issue is in front of me. I don't think you're raising it in a response to a motion properly put in front of me.

I'm really asking you. Is that wrong? I'm thinking if it were, like, in a pleading or something, it would be in front of me, or it's an issue that the Patent Office should take up.

MS. BRANNEN: Good morning, Your Honor. I think we would agree that doesn't -- the point I was trying to make on this motion is, it wouldn't, from our perspective, be a correction. So we were hoping the Court would deny this motion on that basis. But I think we can present evidence to the jury about whether the patent is invalid for failure to list those two individuals who we believe should be listed, who they're not even asking you to add.

THE COURT: And have you raised that issue formally in the case?

MS. BRANNEN: We have, Your Honor.

THE COURT: Okay. Okay. Well, then we'll take that up at trial.

Next up, I have -- give me one second -- the motion to exclude rebuttal report and testimony of

Dr. Alfonso Ortega.

And for the record, I have: Paragraphs 91, 92, 133 through 146, 178, 184, 189 and 90, 213, 222, 239 and 277.

I'll hear argument on that, please.

MR. THOMAS: Good morning, Your Honor. Joseph Thomas on behalf of the plaintiff Midas Green Technology.

Your Honor, this is a case that is, in my 40 years of practice, I've never seen. A law firm directly engage a party who was supporting an expert and use the privilege to shield from discovery all communications, all test data, all test parameters, and produce nothing but a simple result file, which is what happened here today -- or happened in this case.

We think the law's very clear under Rule 26 that anything the expert relies upon must be produced in a case, and had Mr. Ortega functioned, as the defendants claim, as his support staffer -- is the term that they've used -- all of this would have been discoverable, none of this would have been hidden from us.

And as it stands, the only thing we have access to is a simple result file that, of course, shows a result that Dr. Ortega likes and counsel for

Rhodium likes, but none of the underlying test parameters, test conditions, test failures, the convergence data has been produced. And this kind of -- I guess it's almost a policy argument, I mean, whether the Court would sanction and allow lawyers to --

THE COURT: I got it. I got it.

Is there anything else you need to add?

MR. THOMAS: No, Your Honor. We briefed this and it seems like you've read it. I would just point out, we think the Cellular Communications Equipment case is really on point here, and this report should be excluded.

THE COURT: The portion -- the paragraphs I just read out should be excluded, right?

MR. THOMAS: Well, we think the -- there's a basis to exclude the entire report. We've also, alternatively, cited specifically paragraphs that rely on and use in reference to this CFD report. I can recite those for you if you want, Your Honor. They're in our moving papers.

THE COURT: No. I -- okay.

I'll hear a response.

MS. BRANNEN: Good morning, Your Honor.

We think that the criticisms are wrong on

09:47 1 the facts about what happened, and also about the law.
09:47 2 So Dr. Ortega, to start with, opines that limitations
09:48 3 of the patent claims are missing and this motion, as I
09:48 4 think the Court has observed, only affects one
09:48 5 limitation, the plenum limitation.
09:48 6 And what Dr. Ortega did for that
09:48 7 limitation, it requires a plenum at the bottom of the
09:48 8 tank; and that has to be adapted to dispense the
09:48 9 dielectric fluid in the tank substantially uniformly
09:48 10 upwardly through each appliance slot.
09:48 11 The first thing that Dr. Ortega did was
09:48 12 to look at the design of the tank, the thing they're
09:48 13 pointing to is the plenum. One part of it has a bunch
09:48 14 of holes in it and it's designed to send the fluid
09:48 15 where things are hottest and need to be cooled the
09:48 16 most.
09:48 17 And he used his expertise to say this --
09:48 18 you know, this doesn't go substantially uniformly
09:48 19 upwardly. He reached that conclusion separately on the
09:48 20 plenum limitation.
09:48 21 Then he used data from the CFD analysis
09:48 22 that they challenge. Now, whether they're right, that
09:49 23 the -- his graduate student, who he trained how to do
09:49 24 CFD -- whether they're right, that that was an
09:49 25 independent expert, nontestifying expert, or whether

we're right, that that was his support staff, his graduate student, the standard for what we had to do was the same. Any of the data that Dr. Ortega relied upon, reviewed and relied upon, we had to produce to them. And we did that.

And their motion says we didn't give CAD files, for example. That's flatly wrong. We can look at their own expert's report at Paragraphs 132 and 52, and he cites those CAD files because we produced them in November.

They're also -- they also try to say that there was cherry-picking. No. Dr. Ortega said, here's -- that's a very large set of data. I want to see the part that's right -- you know, he chose the place he wanted to see it based on the claim language, which requires the fluid to be going substantially uniformly upwardly through the appliance slot.

That data that he relied upon, we have produced to them. They never asked for additional data from us in discovery. They never used this Court's robust and efficient discovery dispute processes to say we should have given them anything more.

And they're just wrong that communications with support staff or nontestifying experts get produced under Rule 26. They don't. The

thing that gets produced is what we have produced, what the expert relied upon.

There is a case in response to the argument they make in reply that I would like to call the Court's attention to where the fact pattern is very similar and the expert who was undisclosed was found to be -- there was no exclusion of the testifying expert's report. That is National Wildlife Insurance Company versus Western National Life Insurance Company. It's a 2011 case, 2011 Westlaw 840976, from the Western District of Texas on March 3rd of 2011.

And there is also a major goose/gander violation going on here, because we haven't had a privilege log or the production of any communications with the support staff of any of Midas Green's experts.

They want to have their Dr. Lee testify about claim charts that he admittedly did not prepare. They want to have their damages expert Mr. O'Bryan be able to rely on hearsay from his subordinates.

So with everything going on, there's certainly no basis, no authority whatsoever, for excluding the entirety of Dr. Ortega's opinions. But even his opinions about the CFD that they're challenging, there is no basis to exclude those, not under the facts of what actually happened and not under

09:52 the law of what Rule 26 protects from discovery and
09:52 what it allows to be discoverable.
09:52 THE COURT: I'll be back in just a
09:52 second.
09:52 (Pause in proceedings.)
09:52 THE COURT: The Court is going to grant
09:52 the motion with respect to those paragraphs.
09:52 With respect to the issues that counsel
09:52 brought up at the end under the goose/gander standard,
09:52 if you have issues with what they've done, I'll
09:53 certainly entertain those separately.
09:53 Next I have the motion to exclude
09:53 Dr. Pokharna.
09:53 MS. BRANNEN: Good morning, Your Honor.
09:53 We are asking to control aspects of
09:53 Dr. Pokharna's expert report that we learned about for
09:53 the first time in the -- in his report itself that were
09:53 not in the final infringement contentions and also to
09:53 exclude his opinion about a system at the Temple
09:53 facility of my client that is admittedly inoperable
09:53 because they ran out of money and they never actually
09:53 finished installing what is accused. And so we think
09:53 it would not be -- it's just unreliable to convene a
09:53 jury, and there's no fact issue over that.
09:53 So to start with the new opinions that

were undisclosed, we set those forth in our brief, but I would point out, Your Honor, this is a case where they didn't even tell us they were planning to amend the contentions. They didn't move to amend earlier, give us any warning.

And so the prejudice that we are complaining about is that if we had known that these theories might be something Dr. Pokharna would present, we would have had the ability to take fact discovery and conduct our fact discovery with that in mind.

And it's not a simple case of just getting to depose Dr. Pokharna again for an hour. There are seven named inventors, six of whom are coming off. There were two -- there was a corporate witness for Midas Green and another witness for Midas Green about their systems. There were many Rhodium witnesses.

It's just really unfair, and it shows a disrespect for the rules to have not even alerted us that they wanted to amend the final infringement contentions and to disclose these theories for the first time there.

With regard to the systems that are inoperable, that's just silly to have a trial about that. There's no fact dispute over that, and it would

be a waste of judicial and party resources to do it.

So we would ask that that not -- you know, the system was over two years ago. Our client concededly ran out of money, never installed it.

Their expert has conceded it cannot measure temperature. It's not wired in. There's just nothing to present to the jury.

And it would be unreliable for Dr. Pokharna to opine that systems in that state practice any of the limitations.

THE COURT: A response?

MR. KOLEGRAFF: Yes. This is William Kolegraff.

First of all, there's absolutely no -- nothing was hidden here from them. There's nothing new that was put in Dr. Pokharna's report. For example, this whole idea that Prime Controls, they were surprised about, is, well, just very surprising.

Because on March 15th, 2023, we fully set out to them in a supplement to Interrog 4 (sic), which is Exhibit D here, the exact way that the Prime Controls was set up and that Prime Controls was going to be the infringing set of devices.

In response to our having done that supplement to Rog 10, they came back in their

Supplement Rog 1 and said: As a result of the system described in plaintiff's supplemental response to Interrogatory No. 10 and accused in plaintiff's final infringement contentions...

They admitted that what was in the final infringement contentions were these Prime Control devices. So there's absolutely no surprise here.

Also, this actually is in the contentions. We don't say the name "Prime Controls" with the name "Prime Controls," but it's actually set out that says: The control -- from the contentions -- the control facility includes an automated controlling with software that measures and monitors and controls the pumps, dry coolers, and temperature of the fluid.

That's exactly what the Prime Control systems does. So Prime Control has been fully set out, including Exhibit E, which is a manual that we have cited to, that is the exact Prime Controls manual.

As far as the Kelvion coolers, in the contentions themselves, we lay out that there are two Kelvion coolers. There's a Guntner coolers at the Rockdale facilities; there's Kelvion coolers at the Temple facility. And they form the second -- secondary cooling facility.

Again, those are fully disclosed in the

09:57 contentions, and they were the basis for Dr. Pokharna's report.

09:57 As far as what was installed not being reliable, yes. It is true that they installed significant portions of the Prime Control systems at Temple, and then because they ran out of money, they did delay that process.

09:58 However, we do know that there is evidence that says that they are planning on re- -- turning that system on -- finishing that system and turning it on later.

09:58 So they have substantially installed the Prime Control systems. They're on the 99-yard line. They just haven't flipped the actual switch.

09:58 The system is still adapted to -- it's still capable of taking these measurements once they finish and flip the switch.

09:58 So they also have this issue where they don't believe that we have disclosed the slots, that they were surprised that we have the slots.

09:58 Well, again, if you look through the -- our opposition, we put pictures of the slots in the first amended complaint. We had -- in our supplement to No. 4, we actually had a picture of the tape with red lines showing where the slots were.

There's absolutely no surprise whatsoever to anything in the -- Dr. Pokharna's report.

THE COURT: I'll be back in just a second.

(Pause in proceedings.)

THE COURT: The Court grants that motion.

The next motion we have up is the motion the exclude James Lee. I'll hear from defendants on that.

MS. BRANNEN: Your Honor, on this motion, we had two aspects of it. Sorry. For a moment, I wasn't sure if you were calling on us or the other counsel.

But the first aspect is a correction -- what they call a correction, but it's really an addition to Dr. Lee's report that he served at the end of a deposition.

Their position just doesn't make any sense on this. They argue simultaneously that it is duplicative of what was already in his report and that it's necessary.

It can't be both. And all I know is that it's too late, and we ask Your Honor to exclude it.

The other thing that we are focusing on in this motion is the fact that Dr. Lee is their

rebuttal expert, not their opening expert.

And he gave an opinion that based on charts that he did not prepare, that apparently counsel prepared, as they say they had been produced in discovery, he gave an opinion that Midas' products practice the patents.

We think that opinion is unreliable. But in any event, it's too late -- too late for their damages expert, their opening expert to have relied upon it.

And that's basically about it for that opinion. It's not plausible, and it also is too late for the purposes they want to use it for in the case.

THE COURT: Who's going to respond to this?

MR. THOMAS: Joseph Thomas.

THE COURT: Is there any reason why -- I think I've gone over this -- why this couldn't be taken care of by just allowing this gentleman to be deposed now?

I'm asking you, Counsel.

MR. THOMAS: You're asking Mr. Thomas?

THE COURT: I'm asking you. I'm asking you. I don't know how to make it any clearer. I'm asking you to respond.

10:02 MR. THOMAS: The -- Mr. Thomas. Yes.
10:02 THE COURT: Yes.
10:02 MR. THOMAS: We're happy to let him be deposed again if they want to. We don't think they need to. They had his --
10:02 THE COURT: Well, I'm -- stop while you're ahead. I'm going to allow them -- I'm going to deny the motion and allow them to depose the witness.
10:02 Now, going back to Mr. -- or Dr. Pokharna. Is he your only infringement expert?
10:03 MR. THOMAS: Yes.
10:03 THE COURT: So what I'm going to do is -- it will obviously impact the trial setting, but I'm going to allow you to amend his report, see if you can fix it. And you all will need to get together with opposing counsel and figure out how long you think it'll take for Dr. Pokharna to address any of the issues that you think would make his opinion survive a future challenge.
10:03 And then y'all can set up a schedule to figure out how to deal with that in terms of rebuttal reports and all that. So I'm going to allow him to amend his report.
10:03 Next up I have the motion to exclude -- I don't know if it's a doctor or not. I don't think it

10:03 is -- Duross O'Bryan. This is the defendants' motion.

10:04 MS. BRANNEN: Thank you, Your Honor.

10:04 THE COURT: This one -- this one has both lost profits and a reasonable royalty analysis.

10:04 MS. BRANNEN: That's correct.

10:04 Is my screen successfully sharing? We prepared a few slides on this one.

10:04 Midas' damages opinion -- damages expert makes four main errors that we believe are substantial and not just matters that we should have to cross them on, Your Honor. The first error pervades both his lost profits and his reasonable royalty damages.

10:08 (Clarification by Reporter.)

10:08 (Recess taken.)

10:08 THE COURT: Let's go back on the record.

10:08 MS. BRANNEN: Thank you, Your Honor. This is Elizabeth Brannen, addressing the motion to exclude Midas' damages expert, Mr. O'Bryan.

10:08 The first error he made pervades his lost profits and reasonable royalty opinions, both of them. And he basically doubles his damages number by assuming that Rhodium would continue infringing for almost three years past trial, even if there's a jury verdict of infringement.

10:09 Now, the patent -- he's -- the patent

10:09 doesn't expire till something like 2035. He's not
10:09 giving an opinion about a fully paid-up license. This
10:09 is something different going on. He's saying he has
10:09 the ability to award damages after trial based on
10:09 speculation that my client would continue to infringe.
10:09 And there's just no basis for that. Certainly no
10:09 reliable basis.
10:09 If we look at the basis he said he had --
10:09 I'll try sharing my screen here to put some of this --
10:09 make some of this visible -- he's relying only on a
10:09 single projection, and that projection is something
10:09 that Rhodium filed in connection with a potential
10:09 merger transaction. And that document just says that
10:09 Midas -- that Rhodium -- excuse me -- plans to expand
10:09 its operations to full capacity if the merger goes
10:10 through.
10:10 Well, two problems. First of all,
10:10 expanding your operations doesn't say anything about
10:10 whether you would continue infringing or ignore an
10:10 infringing verdict. And even more importantly, that
10:10 merger never happened. It was canceled. And
10:10 Mr. O'Bryan omitted the -- didn't take into account the
10:10 fact that he just assumed that --
10:10 THE COURT: Let me interrupt you and hear
10:10 a response to that argument.

10:10 MR. THOMAS: Your Honor, the representations made in that S-1 were for a merger that was canceled, but the representations were not conditional. They did not say, If we get the merger, we'll do this expansion. They just said that our business plan is to expand.

That's what they told their investors. They had existing investors and the prospective new investors through the merger. So those representations are from Rhodium of their own expansion plans, which are reasonable for Mr. O'Bryan to rely upon.

THE COURT: Did he or did he not rely on that merger when he -- when he comes in and he says, This is what I did. I looked and there's this document that shows there's going to be a merger and -- to rely on and the merger didn't happen, is that what he's going to say?

MR. THOMAS: No. He's going to say these are representations that they issued that were not conditioned upon the merger. They were made in the public forum. And I'm going to rely on their representations to their investors that they had a plan -- they have a plan to expand.

THE COURT: Okay. Is there anything else you'd like to say with respect to the lost profits

10:11 argument that the defendant is making?

MR. THOMAS: Yes, Your Honor. The lost profit analysis was done correctly. It was based on information that was available to the experts. Both sides' experts have acknowledged there are no licenses. This is relatively brand-new technology in this field. This immersion cooling technology hasn't been licensed.

Mr. O'Bryan properly used the sales of the product as a basis, and there's good case law we cited for him to rely upon the sales as a basis to determine the reasonable royalty, and the profits from those sales to support that reasonable royalty analysis.

THE COURT: Would you give me an example?

MR. THOMAS: Yes. They -- they -- our deadlines made a significant sale to a company known as RITE. It's a public company. It's one of the largest bitcoin mining companies in the -- North America, if not the U.S. -- if not nationally -- internationally.

And those sales occurred well within months or within a year or so of the time that the license would have been negotiated. And under the Book of Wisdom, Mr. O'Bryan used those sales to forecast what the expected profits would be of my client in terms of making assumption on how to --

10:13 THE COURT: How does the Book of Wisdom, what does that have to do with lost profits?

10:13 MR. THOMAS: Well, the lost -- we believe that the sale of the --

10:13 THE COURT: No, no. What does the book of profits -- what does that have to do with lost profits? I don't understand.

10:13 MR. THOMAS: Well, the -- we believe that the case law allows Mr. O'Bryan --

10:14 THE COURT: Tell me any case that discusses the Book of Wisdom in a context of lost profits.

10:14 MR. THOMAS: Okay. Well, Your Honor, we don't need the Book of Wisdom. Rhodium installed 200 megawatts. He's using their actual installation as the basis to determine a sale that would have been made by my client to Rhodium of those products. And using those -- that sales information, he projected his lost profits.

10:14 THE COURT: Okay. I'll be back in just a second.

10:14 (Pause in proceedings.)

10:15 THE COURT: This question is for -- sorry for all the coughing -- either party, but I'll start with the party that is moving for this, the defendant.

10:15 What specific paragraphs in his -- in the report are you asking me to strike on lost profits? Can you articulate those into the record?

MS. BRANNEN: Your Honor, I would need a moment to pull it up and articulate them into the record, but we're asking to strike his entire lost profits opinion, because he has no basis --

THE COURT: Is it -- I'm sorry. Is it divided up, lost profits -- I'm making this up -- Page 1 through 10, reasonable royalty, 11 through 20. Is it -- is it that clean?

MS. BRANNEN: I believe it's fairly clean. Let me show my screen to give an example of one page. Let me see if I can do it.

So here's an example of a table in his report. And he's very clear at the top about what his reasonable royalty number is. And then underneath that, he's clear -- he's got a separate line item for what his lost profits opinion is. And so the report is well organized in the sense that his lost profits opinions are coherent. And I apologize that I don't know exactly those, but if we take a short break, I can --

THE COURT: Here's what I'm going to do. We've gone over -- I'm going to grant the motion with

10:17 respect to lost profits. Same deal. If the
10:17 defendant -- I'm sorry -- the plaintiff wants to have
10:17 their expert redo the lost profits and try and go
10:17 again, that's fine. You all need to figure out how to
10:17 do the schedule.
10:17 I'm going to deny the motion with respect
10:17 to the -- his reasonable royalty calculations.
10:17 Next up, I have the motion for summary
10:17 judgment of noninfringement. I'll hear from the
10:17 defendant on that, please.
10:17 MS. BRANNEN: Thank you, Your Honor.
10:17 May I clarify the Court's ruling on
10:17 Mr. O'Bryan? The posttrial damages period that he has
10:17 is in his lost profits, but it also pervades his
10:18 reasonable royalty. Is there a separate ruling on the
10:18 aspect of damages --
10:18 THE COURT: So I usually don't have a
10:18 problem with the jury answering future reasonable
10:18 royalty, because then at least we have a reasonable
10:18 royalty rate. And if the plaintiff is successful, then
10:18 the jury will have spoken as to the reasonable royalty
10:18 rate, which is probably what I would consider applying
10:18 on damages going forward, if you continued to make
10:18 sales.
10:18 And they're not going to get those

10:18 damages, future damages, unless you -- the sales were
10:18 actually made. And the way I've done it in the past,
10:18 both as a lawyer and as a judge, is let's say plaintiff
10:18 wins. Reasonable royalty rate -- I'll make up
10:18 something -- 5 percent. I would allow you -- allow the
10:18 defendant to continue to sell and -- but they would
10:18 have to put into the registry of the Court the
10:19 6 percent. If you stopped selling, there would be no
10:19 future damages under a reasonable royalty deal. Does
10:19 that sound -- is that what you were asking me?
10:19 MS. BRANNEN: Thank you, Your Honor.
10:19 Yes. I think it clarifies it. In other words, as I
10:19 understand it, lost profits, they've got to completely
10:19 redo it if they want to try to get it in.
THE COURT: Correct.
10:19 MS. BRANNEN: Reasonable royalty, they --
10:19 THE COURT: And I'll say right now, lost
10:19 profits -- is there -- let me ask the plaintiffs: Is
10:19 there no request for an injunction here?
10:19 MR. THOMAS: No. No, Your Honor. There
10:19 isn't.
10:19 THE COURT: Okay. Is there a reason
10:19 there's not a request for injunction?
10:19 MR. THOMAS: I'm sorry. I misspoke.
10:19 There is a request for an injunction.

10:19 THE COURT: Okay. So generally speaking again, what I will do is, with regard -- if it's a lost profits, I probably will have to -- I probably won't give them a question on future lost profits, but again, and this is because we don't know whether there'd be any, I will take up the injunction question because you all, I assume, are competitors or you wouldn't have lost profits.

And so but I will -- so don't anticipate getting a lost profits question going forward, but if you can redo it and you think you can get past a Daubert challenge, I'll do it for both prior. And then if -- again, only if the plaintiff wins, if the defendant comes in and says, No, you shouldn't give an injunction, well, then we'll have to figure out a way to be fair to the plaintiff to make sure how we assess damages going forward. And I'll take care of that.

So did I make it clearer or less clear on what I just said for everyone? I'm happy to answer any questions that you have.

MS. BRANNEN: Your Honor, this is Elizabeth Brannen for Rhodium. Just I think it's clear with respect to the original question I was asking.

So for their reasonable royalty, they're not going to get a damages award past trial

automatically, they have to present what it is through trial and then they can get a separate ruling on if Rhodium were to continue to infringe, what could the reasonable royalty be after that. Have I --

THE COURT: Right. And I've seen it handled two ways, and I would let you all argue what's fair. I've seen it where the jury's given an amount -- I'm making this up again -- 5 percent. And so you give the 5 percent. This is where the Book of Wisdom does come in. You know, they will have figured that out.

But I've also seen judges who have considered giving a slightly higher, going forward, because it's now -- the jury's now found infringement. So but they're -- I'm not going to award -- now, I didn't hear anyone talk about a lump sum. If there is a lump-sum award that goes through the end of the -- that would go through the end of the patent, whenever that is, which is a period going forward, but obviously, it's an amount that neither of y'all have done yet and that someone would say, as opposed to reasonable royalty, we would take -- the plaintiff would have taken a lump sum of X and y'all would have paid a lump sum of X and -- y'all have -- but y'all haven't done that. So that's not an issue here.

So as far as I can tell, from the way the

10:22 plaintiffs have structured their damages model, they
10:22 won't be getting future damages until we see if they
10:22 win and what I do on the injunction, and then if there
10:22 is not an injunction and you all do continue to sell
10:22 what the jury has determined to be infringing, I'll
10:22 make sure we come up with some way of making sure the
10:22 plaintiff is protected financially.
10:22 Anything else?
10:22 MS. BRANNEN: Just I would like to
10:22 clarify, my client is not a competitor of Midas Green,
10:23 not even allegedly. And that's part of why they have
10:23 such a trouble of meeting the lost profits standard.
10:23 THE COURT: Well, then they're going to
10:23 have a really tough time getting an injunction.
10:23 MS. BRANNEN: I don't even believe
10:23 there's a live injunction request, Your Honor. That
10:23 was news to me. I do not think they've preserved it.
10:23 I certainly don't think they have --
10:23 THE COURT: Well, they've told me there's
10:23 an injunction request. Maybe there is; maybe there
10:23 isn't. I don't know.
10:23 MS. BRANNEN: Thank you.
10:23 THE COURT: I'm up with the law, that
10:23 they only get one if y'all are competitors. And I
10:23 don't know -- I'll know much better after trial whether

10:23 or not I think you're competitors.

MR. THOMAS: Your Honor, that is a disputed issue in this case. We contend, Your Honor, we are competitors.

THE COURT: Well, I have no way of knowing which of you is right.

So next up we have the motion for summary judgment of noninfringement. I'll take that up.

MS. BRANNEN: Thank you, Your Honor.

So the technology at issue involves systems for pooling bitcoin miners. The computers that do the mining get very hot when they're mining bitcoin.

And in particular, the patent and the accused systems -- and you can see a picture -- some of the accused systems, they relate to their immersion cooling systems. Meaning, there are miners that get immersed in dielectric fluid. It doesn't conduct electricity. And as the liquid is circulated through the system, it removes heat from the miners.

We believe a lot of limitations are missing, but we focused our motion on a single claim limitation. And we believe it's the rare case where Midas doesn't have any evidence that Rhodium uses anything like this limitation that's shown here.

And it requires the system to have a

10:24 control facility, and that control facility has to be
10:24 adapted to coordinate the operation of two different
10:25 fluid circulation facilities, a primary facility and a
10:25 secondary facility.
10:25 And it has to be adapted to coordinate
10:25 their operation based on this recited variable as a
10:25 function of the temperature of the dielectric fluid in
10:25 the tank containing the bitcoin miners.
10:25 And we don't -- basically, for the
10:25 primary fluid circulation facility, you can think of
10:25 that as the pipes and pumps. That's what they say it
10:25 is. We may take issue with that at trial, but not for
10:25 purposes of this motion.
10:25 Similarly, for the secondary fluid
10:25 circulation facility, they point to these large coolers
10:25 that have fans in them. So you can think of the
10:25 primary as pumps and pipes; secondary, they say it's
10:25 the fans and the dry coolers.
10:25 And we pointed out in our motion that we
10:25 don't take the temperature of the fluid in the tank,
10:26 and we don't use it for anything, let alone to
10:26 coordinate either of those facilities, those fluid
10:26 circulation facilities.
10:26 Reading their opposition, you could be
10:26 forgiven for assuming that I'd be standing in front of

you asking for a very narrow special construction of this term, but that's not what we're doing.

Our motion, we construed nothing. We agree that this term gets its plain meaning, and we don't have this limitation or anything like it.

And so in our motion, we went through all the various theories their expert had put forth, some of which have been addressed in the motion to exclude Dr. Pokharna, where the opinions weren't in their final infringement contentions.

But we went through all the various theories of why they said this limitation was present, and we debunked each of them. And we showed why the limitation isn't there literally and why, in those instances when he had offered an opinion under the doctrine of equivalents, there was no -- nothing in the report, no evidence that could satisfy that standard for insubstantial differences for same function-way-result.

So the first thing I'd like to hopefully establish in this motion is that based on the DMM Specialities case, which we cite in our reply at Page 2 and also just common sense, their opposition makes no attempt whatsoever to defend or salvage any of Dr. Pokharna's theories under the doctrine of

10:27 equivalents.

10:27 You can scour their opposition. The word "equivalent" isn't there. "Equivalents" isn't there. "DOE" isn't there. "Insubstantial" or "substantial differences," it's just not discussed. They have waived this.

10:27 And I'm happy also to go through each of the things that they have -- all the various theories they pointed to and show why there is a failure under the plain meaning of this limitation to show that we have anything like it.

10:28 But the first system that they accuse are the Prime Controls and Kelvion sensors. Those are the ones that are admittedly inoperable that I believe have been excluded in connection with Dr. Pokharna's report.

10:28 And I don't think this is fixable, Your Honor. There is no -- there's attorney argument, and we heard some of the attorney argument from Mr. Kolegraff.

10:28 But this is a system where most of the sensors are missing and none of the sensors they're pointing to is wired in. And perhaps more importantly, their expert, you can see the interrogatory response they cite to in their opposition at Page 13, saying: Even where a sensor is connected, it is not wired in.

10:28 Their expert, Dr. Pokharna, conceded that
10:28 in its present state, this system cannot measure
10:28 temperature.
10:28 Now, even if this was operational, they
10:29 haven't explained what they believe the plain meaning
10:29 of this limitation is or why what this system was
10:29 designed to measure would actually be adapted to
10:29 coordinate both control facilities.
10:29 And so that's also another problem with
10:29 this whole theory, that you can see up here the
10:29 sensors, where they would go, are in an entirely
10:29 different building and they have a little sign they
10:29 have labeled -- their own expert has labeled that the
10:29 building containing the tanks with the miners is in a
10:29 completely different place.
10:29 This wouldn't be the variable they need
10:29 to show that we're using, and they also can't show that
10:29 it would be adapted to coordinate both fluid
circulation facilities.
10:29 The only evidence they give is shown
10:29 here, that it would be adapted to adjust the fan speed.
10:29 Well, that's what they say is the secondary circulation
10:29 facility. In order to survive summary judgment, they
10:29 should have to present evidence and explain how that
10:30 evidence could lead a reasonable juror to believe that

10:30 the claim language is satisfied with respect to both
10:30 circulation facilities and being adapted to coordinate
10:30 the operation of both of them. And they just can't do
10:30 that for the main thing that they spent the most time
10:30 on in their brief, which is this Prime Controls and
10:30 Kelvion coolers.

10:30 And by the way, they briefed those
10:30 separately, but Prime Controls and other vendors were
10:30 hired to build the monitoring system for the Kelvion
10:30 cooler. So even though they talk about the Prime
10:30 Control system and then they talk about the Kelvion
10:30 coolers, you can see, for example, from their brief at
10:30 Page 18, the thing they're citing to for the Kelvion
10:30 coolers as evidence that those infringe, that's all
10:30 design documents of Prime Controls. That was
10:30 admittedly never installed and is admittedly
10:30 inoperable, cannot measure any temperature.

10:30 So at the last page of their brief, they
10:30 give a couple throwaways to try to defend a theory of
10:31 infringement based on the Guntner coolers. These are
10:31 shown here. These are only at Rhodium's Rockdale
10:31 facility.

10:31 And again, the tanks containing the
10:31 miners are in one place, and the coolers they're
10:31 pointing to are outside the building. And what their

10:31 theory is here is that Rhodium measures the temperature
10:31 of the fluid after it comes out of the cooler.
10:31 Well, that obviously is not literally the
10:31 same thing as the fluid in the tanks nor is it even
10:31 arguably insubstantially different.
10:31 And they also -- for this one too, all
10:31 they say is that we might use it to adjust the fan
10:31 speed in these coolers. There's no evidence they can
10:31 point the Court to of how this is in any way adapted to
10:31 coordinate the operation of what they've pointed to as
10:31 the primary fluid circulation facility, the pumps and
10:31 the pipes.
10:31 So it's deficient in multiple respects.
10:31 And the single paragraph in their opposition that's
10:32 dedicated to try to revive this doesn't answer the
10:32 question of how this is using the right variable in any
10:32 way, let alone using any variable to control both fluid
10:32 circulation facilities. They only talk about fans.
10:32 Then the final thing that they also try
10:32 to revive is the fact that in both facilities, Temple
10:32 and Rockdale, Rhodium can measure the temperature of
10:32 the chips in the miners and the printed circuit boards
10:32 in the miners.
10:32 Their expert, though -- obviously
10:32 measuring a chip temperature or a board temperature is

not measuring the temperature of the tank fluid. And their expert admitted those are different. So there's no literal infringement. There's no analysis of why it would be insubstantially different.

And again, here too, all they say with PCB temperature is that we can monitor it. All they say with chip temperature is that we can shut off the miner or reduce power to the miner.

But what they haven't said is what evidence is there anywhere in the record that we could use either the chip or PCB temperature to coordinate the operation of the pumps and pipes or of the fans, which they say are the primary and the secondary circulation facilities.

There is no evidence. It's a rare case where none of their theories even make sense. And we hope they should have to articulate one that we can at least understand what this jury is going to be asked to decide before they would be allowed to proceed.

THE COURT: A response?

MR. KOLEGRAFF: Yes. So as -- there are just a lot of triable issues of material fact here. And what Rhodium has done to try to eliminate those facts is they've taken a very unusual reading -- a plain reading of Claim 1.

10:33 And what they're trying to say is that you have to have your temperature sensor in the tank to take the temperature of the fluid.

10:34 Their entire motion is based upon that premise, that they have to require a sensor in the tank taking the temperature of the fluid. But the claim just doesn't say that.

10:34 Now, this is extremely important to it. On Page 2 of their motion, they say: In other words, to infringe Midas' asserted claims, a cooling system must take advantage of the dielectric fluid while it is -- must take the temperature while it is in the tank.

10:34 They say the same thing on Page 4: Neither of the tanks have a fluid temperature in the tank.

10:34 This is repeated throughout their motion. That is the basis for this entire motion, is that there has to be a temperature sensor inside the tank in order to take the temperature.

10:34 If we look at Claim 1 and parse it, it talks about: A control facility adapted to coordinate the operation of the primary and secondary fluid circulation facilities as a function of the temperature of the dielectric fluid in the tank.

That plain reading does not say where a temperature sensor has to be. It certainly doesn't place it in the tank. It certainly doesn't even say you have to take the measurement of the fluid itself.

All you have to do is collect enough information so that you can coordinate the operation of the two circulation facilities.

So here you can have that sensor -- that temperature sensor, you could have it in the tank. You don't have to. But you could have it on the pipe leading out of the tank. You could have it on the inlet pipe to the tank. You could have it further down towards the coolers.

Every one of those data points, every one of those points, is going to give you sufficient data in order to make decisions on how you want to run your pumps and fans.

For example, we are talking about the Guntner coolers, which are the coolers that sit out in the -- outside the building, there, we are measuring the fluid temperature that comes out of the cooler.

That is the exact same temperature as is going into the tank. So we are measuring the temperature of the fluid in the tank, and we adjust the fan speeds of that Guntner -- excuse me -- Rhodium

10:36 adjusts the fan speeds of the Guntner cooler to make sure that that inlet temperature to the tank remains very constant.

We know for a fact that the claim does not require that the temperature sensor be in the tank, and we know it for at least a couple of reasons.

First of all, if we look at Figure 13 of the patent, there are sensors that are shown not only in the reservoir, which is separate from the tank, but the temperature sensors are also shown in the fluid pipes and shown in the fluid pipes of the primary circulation facility and shown as the temperature sensors in the secondary facility.

So even the embodiments that we have in the patent do not show the sensor in the tank.

It's also shown in Figures 4 and 12 where you have the tank, which is numbered 14, the tank 14 does not have a sensor in it. The only sensor is in the recovery reservoir, which is No. 42. So again, even the embodiments that we have in the patent do not require that the sensor be in the tank.

So let's talk a little bit about Prime Controls. Prime Controls is a very sophisticated control system that has no other purpose in life but to control and manage the system at the Temple facility.

10:37 There are temperature sensors, there are pump controls, there are reporting facilities. They spent millions of dollars putting this thing in, and it has no noninfringing functionality.

Again, if you look at Exhibit G of our opposition, you can see that they have the layout of the complete system, the entire plumbing and design system. H shows a picture of the Kelvion and Temple coolers that have the temperature sensors installed. They're already there in the pipes.

They talked about saddles being installed. They purchased saddles to put on those pipes so they can make the finishing of the installation even easier.

If you look at Exhibit I, there is an issued-for-approval manual on how this whole system is supposed to be put together, this Prime Control system, and it shows all of these things working and in operation. So it's almost fully installed. They just haven't flipped the final switch.

And let's -- we're going to suggest here, is that they have just not turned on that switch because of this litigation. As soon as this litigation is over, you know, they're very likely to turn this thing back on because, again, they've got a million

10:39 dollars of sunk costs, that they're going to need to turn on. And we have an e-mail, this is from a Depo Exhibit 77, that says: Our plan -- and that's referring to Rhodium -- Our plan is to get Prime Controls paid back and then have Prime Controls finish the rest of the work on the site.

So that is a huge issue of fact, whether or not Rhodium is going to reactivate or activate this Prime Controls when this litigation is over.

Also, so -- also, how much work they have left to do is also a huge issue of fact as it goes to Prime Controls.

As far as any waiver, we've waved nothing. We attached the entire report of Dr. Pokharna, where he goes not only through literal infringement, he goes through doctrine of equivalents infringement on all of these issues.

As far as the Kelvion systems at Temple, that really reduces down to the same arguments we were just talking about with Prime Controls. That is, the temperature sensors are there. The computers are in place. It's basically all set to go, they just have to finish wiring it up and then they're going to be able to control the Kelvion coolers based upon the temperature of the coolant.

10:40 At Guntner, which is at the Rockdale facility, that we do know is in operation. They actually have the Guntner coolers that sense the temperature of the fluid as it's exiting the Guntner coolers. And based upon that temperature, they adjust the fan speed. This is in the Guntner motor managing manual.

They adjust the speed of the fans to keep that outlook temperature the same. That outlook temperature fluid is the temperature of the fluid as it's going into the tank.

Finally, we get to the Restful API, which is this idea that we're checking the temperature of the fluid in the tank by using functionality built into the miners. These miners, which are just very sophisticated computers, actually have a couple different sets of temperature gauges, sensors inside of the miners. One of those is to measure the temperature of the PCB board, the printed circuit board. And the printed circuit board is what's setting up against the fluid. So that is measuring the temperature of the fluid.

And based upon that, the system automatically puts more power on to the miner, if it can handle warming the fluid similar. If the fluid is

too warm, then it actually powers down the miner; it has the miner generate less power. That way it adjusts the amount of heat that is injected into the system, which is controlling the circulation of both the primary and the secondary circulation facilities.

So here we just have a lot of issues of fact as to whether or not Prime Controls is going to be actually finished. We've got questions of fact as to how the Guntner is actually managing the fan speed to control the temperature of the tank; and really, all gets down to their assertion that the temperature probe has to be in the tank, which is just not the plain meaning of this claim.

So with that, I'll turn it back.

MS. BRANNEN: May I respond?

THE COURT: Rebuttal?

Please.

MS. BRANNEN: Thank you.

So I'll try to make five or fewer points. First, I want to talk about what we did not hear. Normally, to oppose summary judgment where we would -- you would hear the plaintiff saying, This is what I think the plain meaning of this limitation is, and this is the evidence I'm pointing you to, Judge, where a reasonable jury could find that the temperature of the

10:43 fluid in the tank is part of the -- is adapted to control both of these variables.

We've never heard that.

We've heard them saying that I'm asking you to give an overly narrow claim construction. I'm not. But they need to be doing something. If they're not measuring it with a sensor in the tank, they need to be explaining what evidence there is that we do anything like using that temperature of the fluid in the tank to coordinate the operation -- to be adapted to coordinate the operation of two different control facilities.

And I didn't hear counsel give an explanation of what that limitation means or what evidence satisfies it.

With respect to Prime Controls -- and this applies to Prime Controls and the Kelvion coolers where they were going to install sensors but never did. The most -- this is where we heard counsel try to point to evidence, but he points to some unidentified deposition testimony that I'm not sure was even in the opposition brief, and is from several years ago, I believe, saying that at one point Rhodium planned to have Prime Controls finish its work.

That is of no moment now.

10:44 If we're going to have a trial now, we can't have an advisory opinion about a system that isn't in place. And that would -- even if we could, that would be an enormous waste of resources. We need to have a trial over the system as it exists now. And Mr. Kolegraff is not pointing to any evidence that all Rhodium needs to do is turn on the switch. The evidence is to the contrary.

10:44 Their own evidence that they cite to this Court is that none of the sensors is wired in. Their expert concedes that the system is incapable of measuring temperature. We really ought not to have a trial over Prime Controls and Kelvion, which may never be finished, may be changed. It's not the province of federal courts to have a trial over something that might happen with a system in the future.

10:45 There also is no evidence of how these sensors, which are nowhere near the tank containing the bitcoin miners, if they were operational, would be used to coordinate the operation of both the fans and the coolers. That's what they say they would do, but how would that be adapted to coordinate the operation of what they say counts as the primary circulation facility, the pumps and the pipes?

10:45 We didn't hear that. We won't hear that,

10:45 from them or their expert, because they have no evidence of that. And they haven't tried to point Your Honor to that evidence now.

The third point I'd like to make is about Guntner. Mr. Kolegraff misstated the record. I will show -- this is their opposition brief, Docket 164. Near the end, I think we're at Page 21. Yeah. Page 21.

The Guntner coolers -- which he acknowledges are outside the building -- the temperature sensors there sense the temperature -- I'm quoting from their brief -- sense the temperature of the dielectric fluid flowing out of the evaporative cooler.

The job of that cooler is to cool. So it's obviously not the same as the temperature of the liquid when it's in the tank with the miners. And their expert concedes as much, and they have completely abandoned any effort to explain how it's insubstantially different or how, under the doctrine of equivalents, this theory could survive.

And the second thing about Guntner, all they say at that page of their brief is that the sensor there in that Guntner cooler is adapted to adjust the cooler's fan speed. Okay. So they have evidence to

10:47 get to the jury on one of the two circulation facilities that they need.

But we didn't even hear Mr. Kolegraff point to any evidence about coordination of the primary facility, the pumps and the pipes, because Guntner, there is no evidence from which a reasonable juror could conclude that this claim limitation is satisfied.

And finally, on Restful API, I will say, we heard attorney argument, but all they're really saying is that Rhodium can monitor the temperature of the chips. They're not pointing to any evidence that the chip temperature or the PCB board temperature is actually adapted to coordinate the operation of anything that they've pointed to as the primary or secondary circulation facilities.

And to -- just to conclude, at minimum, Your Honor, I hope we have at least made the case narrower on doctrine of equivalents, because they did not -- they can't save that by just saying, Oh, but we attached our expert report.

Well, our brief went through the expert report and explained why what the expert said couldn't count -- wasn't enough to get to a jury on doctrine of equivalents. And they made no attempt to defend that, and they shouldn't get to revive it now.

10:48 MR. KOLEGRAFF: Your Honor?
10:48 THE COURT: Yes, sir.
10:48 MR. KOLEGRAFF: May I address those points or...
10:48 Yes. So you asked if we ever described where we get our plain meaning that the temperature probe does not have to be in the tank. I don't want to repeat myself, but yes. We did have evidence that we've shown the Court today.
10:48 For example, Figure 4 and Figure 12 of the patent shows that the sensors don't have to be in the tank. Figure 13 actually shows that you could have the sensors on the fluid lines and the reservoir. You could have it on the -- on the coolant lines. You could have it in the primary. You could have it in the secondary.
10:48 You can put that -- those temperature probes wherever you want them and still control the primary and secondary circulation of those.
10:48 Something we have to understand when we look at the Rhodium system, because we're talking about primary versus secondary, here the primary is the portion of the system that takes the fluid and flows it through the tank, which extracts heat from the miner. The secondary's what happens out at the coolers, where

you take that fluid and cool it through the evaporative cooler.

So where do we have to measure? This is our Point No. 2.

So she's saying we haven't talked about where we actually take the measurements. Well, if you're talking about Prime Controls, they take the measurements all over the place.

Their system has no noninfringing functionality. It is adapted to take the temperatures and control the fans.

True. At this exact moment in time the wires haven't been hooked up, but we have evidence, we have the e-mail that says they are planning to hook these things up when they get the chance.

So they are going to use this system at some point. It's just not believable that you're going to have millions of dollars worth of control equipment sitting there, all of these computers, a room full of computers meant to control this facility, and you're not going to turn it on.

So again, the same thing with the Prime Control and the Kelvion. Even though it can't measure today, it certainly is adapted to.

Now, again, Ms. Brannen said that I

10:50 misquoted how the Guntner works. I thought I got that
10:50 right, because I do understand that what's flowing --
10:50 what we are measuring is the output of the Guntner
10:50 cooler. That is true.
10:50 And that -- and I think I pointed out
10:50 that the output of the Guntner cooler is actually the
10:50 input to the tank.
10:50 So we are measuring the fluid temperature
10:50 of the temperature in the tank. It's just we're
10:50 measuring that at the input line rather than the output
10:50 line.
10:50 So she asked: How is that coordinating
10:50 primary and secondary?
10:50 Well, you have the fans on the Guntner
10:50 cooler, which are adjusting to keep that output at a
10:50 certain temperature or temperature range to make sure
10:50 the miners are being cooled. That is affecting the
10:51 temperature of the fluid as it flows through the
10:51 primary system and through the secondary system.
10:51 We are coordinating the control of the
10:51 facilities by using the output temperature from that
10:51 Guntner cooler.
10:51 As far as the Restful API, I think we've
10:51 shown pretty strongly in the expert report that we are
10:51 measuring at a temperature of the fluid using the PCB

10:51 inside the miner itself, and then that is used to reset the miner to either increase power if it can be run warmer or decrease power if you need it to run cooler.

So I think we've shown this in all of it. Again, there's a -- plenty of genuine issues of fact here for denying this motion.

THE COURT: I'll be back in a few seconds.

(Pause in proceedings.)

10:54 THE COURT: The Court is going to grant the motion for summary judgment of noninfringement. I think that fully takes care of the case for the time being.

I'm not going to take up the motions in limine given my ruling on that motion, which I think obviates the need for a trial at this time.

Is there anything else we need to take up today?

MR. KOLEGRAFF: Your Honor, would we be able to readdress this -- after we get Pokharna's report redone, would we be able to readdress this issue on the motion for summary judgment?

THE COURT: Well, you know, you have -- you've had your chance, but obviously, it's a fairly severe ruling. Let me talk to my clerks and see if

they think anything additional that an expert would say might benefit us. And if it is, we'll let you know. As of right now, I don't think it would.

So anything besides that?

MR. SMITH: Your Honor, if I could ask one more question about the Court's ruling.

There's been a fair amount of argument today about how the systems are today versus after how the systems are turned on or wired or whatever.

So I think we'd want to confirm the scope of the Court's ruling so we would know whether a claim against the facilities, once they're put into operation, would be affected by the Court's ruling today, or would that be a different set of facts?

THE COURT: That would be a different set of facts. I don't know --

MR. SMITH: Thank you, Your Honor.

THE COURT: Yeah. I don't know that it would change the ruling ultimately, but, you know, that clearly is an issue in this case.

MR. SMITH: Okay. Thank you, Your Honor.

THE COURT: Okay. Have a good day. Take care.

(Hearing adjourned.)

UNITED STATES DISTRICT COURT)
WESTERN DISTRICT OF TEXAS)

I, Kristie M. Davis, Official Court Reporter for the United States District Court, Western District of Texas, do certify that the foregoing is a correct transcript from the record of proceedings in the above-entitled matter.

I certify that the transcript fees and format comply with those prescribed by the Court and Judicial Conference of the United States.

Certified to by me this 11th day of April 2024.

/s/ Kristie M. Davis
KRISTIE M. DAVIS
Official Court Reporter
800 Franklin Avenue
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10:56

EXHIBIT 1002

FILED UNDER SEAL

EXHIBIT 1003

FILED UNDER SEAL

EXHIBIT 1004

FILED UNDER SEAL

EXHIBIT 1005

FILED UNDER SEAL

EXHIBIT 1006

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

MIDAS GREEN TECHNOLOGIES, LLC,	)	
Plaintiff,	)	No. 6:22-cv-00050-ADA
VS.	)	
RHODIUM ENTERPRISES, INC., et al.,	)	Pages 1-290
Defendants.	)	

VIDEOTAPED DEPOSITION OF:
HIMANSHU POKHARNA, Ph.D.
TUESDAY, FEBRUARY 6, 2024
9:59 A.M.

Reported by: LINDA NICKERSON
CSR No. 8746

Videotaped Deposition of HIMANSHU POKHARNA, Ph.D., the witness, taken on behalf of the Defendants, on TUESDAY, FEBRUARY 6, 2024, 9:59 a.m., at 18101 Von Karman Avenue, Suite 230, Irvine, California, before LINDA NICKERSON, CSR No. 8746, pursuant to NOTICE.

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ZAVEN BAGHDANIAN (Videographer)
ALFONSO ORTEGA (Via Zoom)
ANDREA AKINOLA (Paralegal)

I N D E X

WITNESS	EXAMINATION	PAGE
HIMANSHU POKHARNA, Ph.D.		
	By Mr. Halpern	7

E X H I B I T S

NUMBER	PAGE	DESCRIPTION
Exhibit 1	13	Expert Witness Report in Accordance with Rule 26, 12-22-23
Exhibit 2	47	Defendants' Third Supplemental Responses and Objections to Plaintiff's First Set of Interrogatories
Exhibit 3	45	Plaintiff's Supplemental Response to Interrogatory No. 10
Exhibit 4	57	Final Infringement Contentions
Exhibit 5	101	Collins Dictionary Definition of Slot
Exhibit 6	102	American Heritage Dictionary Definition of Slot

E X H I B I T S (Continued)

NUMBER	PAGE	DESCRIPTION
Exhibit 7	108	Cambridge Dictionary Definition of Slot
Exhibit 8	113	Oxford Dictionary Definition of Slot
Exhibit 9	213	Deposition Excerpts of Christopher Boyd's Deposition taken on 12-7-23
Exhibit 10	284	Deposition Excerpts of the Corporate Representative of Midas Green Technologies, taken on 9-21-23

IRVINE, CALIFORNIA
TUESDAY, FEBRUARY 6, 2024, 9:59 A.M.

THE VIDEOGRAPHER: Good morning. We are going on the record at approximately 9:59 a.m. on February 6th, 2024. 09:33:24 09:59:20 09:59:27

This begins Video One of the video-recorded deposition of Dr. Himanshu Pokharna in the matter of Midas Green Technologies, LLC, versus Rhodium Enterprises, Inc., et al., Case Number 6:22-cv-00050-ADA. 09:59:29 09:59:32 09:59:40 09:59:44 09:59:53

This deposition is taking place at 18101 Von Karman Avenue, Suite 230, Irvine, California 92612. My name is Zaven Baghdanian from the firm Veritext, and I'm the videographer. The court reporter is Linda Nickerson. 09:59:56 10:00:03 10:00:07 10:00:12 10:00:14

Counsel will now state their appearances and affiliations for the record. 10:00:16 10:00:19

MR. THOMAS: Joseph Thomas on behalf of Plaintiff Midas Green Technologies along with William Kolegraff and for the witness as well. 10:00:23 10:00:25 10:00:27

MR. HALPERN: Ken Halpern on behalf of the Rhodium defendants. With me is my paralegal. 10:00:32 10:00:36

MR. THOMAS: This is Mr. Kolegraff. I mentioned him already. 10:00:46 10:00:47

THE VIDEOGRAPHER: Would the court reporter please swear in the witness. 10:00:48 10:00:49

HIMANSHU POKHARNA, Ph.D.,
having been first duly sworn, was
examined and testified as follows:
10:01:00

THE VIDEOGRAPHER: Please proceed, Counsel. 10:01:00

EXAMINATION

BY MR. HALPERN:

Q Okay. Good morning, Dr. Pokharna. Am I pronouncing your name correctly? 10:01:02 10:01:05

A Yes, you are. Good morning. 10:01:06

Q I'm sorry? 10:01:08

A Good morning. 10:01:08

Q Good morning. Have you testified in a deposition before? 10:01:09 10:01:13

A Yes, I have. 10:01:14

Q How many times? 10:01:15

A I'm going to guess more than 15 times, but probably less than 25 times. 10:01:20 10:01:24

Q Okay. And were those all patent cases? 10:01:25

A Yes, they were all IP-related matters. 10:01:30

Q Okay. And in all of those cases, were you an expert? 10:01:32 10:01:36

A Yes, I was an expert. 10:01:39

Q Okay. Have you been the expert for the plaintiff in all of those cases or were you an expert working with the defendant in some of them? 10:01:41 10:01:47 10:01:50

A I have been both on the plaintiff's side and defendant's side, and in some of the cases, they were countersuing. So I was on both sides in the same case also. 10:01:53 10:01:57 10:02:02 10:02:05

Q Okay. Have you testified at trial? 10:02:06

A Not in district court, but I have testified in trial. 10:02:08 10:02:13

Q Where -- in what court have you testified at trial? 10:02:13 10:02:16

A ITC, ITC. 10:02:17

Q I see. How many times? 10:02:19

A Just for one case. 10:02:20

Q Do you recall what case that was? 10:02:21

A It was Samsung versus MRI. 10:02:24

Q And what technology did that relate to? 10:02:33

A Cooling off outdoor displays. 10:02:36

Q And what sort of cooling technology was used in that case? 10:02:39 10:02:44

A They were using air cooling. 10:02:45

Q Okay. And when you say "outdoor displays," you're referring to electronic billboards? 10:02:48 10:02:50

A Yes. 10:02:53

Q I see. And how did the air cooling systems, just very generally, how did they work in that case? 10:02:53 10:03:00 10:03:02

A So in that case, the core technology involved cooling the displays without bringing external air which may have water and dust inside them, without bringing that air, how would you cool the displays, the LEDs as well as the electronics inside the display. 10:03:02 10:03:09 10:03:16 10:03:21 10:03:27 10:03:32

Q Have any of the other cases in which you have served as an expert witness involved immersion cooling? 10:03:33 10:03:42 10:03:47

A Not immersion cooling, but liquid cooling, yes. 10:03:48 10:03:51

Q I see. And what sort of liquid cooling? 10:03:52

A It's called direct-to-chip liquid cooling. 10:03:54

Q So that was technology where liquid was sprayed on chips to cool them? 10:03:58 10:04:04

A It's mostly liquid in a cold plate that is going around a cooling loop of some sort. 10:04:07 10:04:14

Q Okay. So let me just quickly speak to the ground rules. 10:04:20 10:04:33

I'll take a break approximately every hour. 10:04:35

If you need a break, let me know and you can take a break any time. 10:04:38 10:04:45

The only thing is that if there's a question pending, I'll ask you to do your best to answer before we take the break. 10:04:46 10:04:48 10:04:50

I need verbal answers rather than gestures, nods, because those don't show up in the transcript. I will try not to speak over you. Please try not to speak over me so, again, we get a clear record. 10:04:53 10:04:57 10:05:03 10:05:05

If you can't hear me, let me know, and I'll speak more clearly or more loudly. If you don't understand a question I ask, please ask for a clarification. Otherwise, I'll presume you understood my question. 10:05:08 10:05:12 10:05:16 10:05:18 10:05:21

From time to time, your attorney may object. Even if your attorney objects, you're still required to answer the question unless you're specifically instructed by your attorney not to answer. 10:05:23 10:05:24 10:05:28 10:05:31 10:05:34

Do you understand everything I just said? 10:05:34

A Yes. 10:05:36

Q Okay. And is that -- can we proceed that way? 10:05:37 10:05:47

A Yes. 10:05:47

Q Okay. So you understand that this is a patent infringement action? 10:05:47 10:05:51

A Yes. 10:05:54

Q And that you're under oath? 10:05:54

A Yes. 10:05:56

Q And you understand that the oath that you took is the same oath you would take if you testified in federal court? 10:05:57 10:06:00 10:06:02

A Yes, I understand. 10:06:03

Q Okay. Are you taking any medication that would impair your testimony? 10:06:06 10:06:09

A No. 10:06:11

Q Okay. Is there any other reason you can't give your best and most honest testimony today? 10:06:12 10:06:15

A No. 10:06:17

Q Okay. Now, do you have a computer screen on in front of you? 10:06:18 10:06:24

A Yes, I do. 10:06:25

Q What's displayed on that screen? 10:06:26

A It's my own picture which is very distracting. 10:06:29 10:06:31

MR. THOMAS: Yeah, we can actually -- I don't know why that is set there to be honest with you. If that is distracting to the witness, is that going to interfere with anything we're doing if we close this, just turn it? 10:06:32 10:06:33 10:06:36 10:06:38 10:06:42

THE WITNESS: Thank you. 10:06:47

MR. HALPERN: Oh, I see. That's the -- 10:06:48

MR. THOMAS: It's a Zoom is what it is. 10:06:50

MR. HALPERN: Yeah, yeah, yeah, I don't particularly want to be on the Zoom either. The only person who's being filmed is the witness. Yeah, just like that is fine. 10:06:52 10:06:55 10:06:57 10:07:00

MR. THOMAS: Okay.

MR. HALPERN: Okay. 10:07:02

THE WITNESS: Thank you. 10:07:02

BY MR. HALPERN: 10:07:03

Q All right. Do you have your cell phone with you? 10:07:03 10:07:12

A No, I do not. 10:07:12

Q Okay. All right. And do you agree that you won't -- I'm not referring to breaks now, but you won't communicate with anyone during your testimony other than incidentally as your lawyer may need to instruct you? 10:07:13 10:07:22 10:07:24 10:07:30 10:07:33

MR. THOMAS: Yeah, I have to -- other than necessary attorney-client communications, he won't communicate with any third party. 10:07:34 10:07:37 10:07:40

BY MR. HALPERN:

Q Okay. Did you do anything to prepare for today's deposition? 10:07:41 10:07:44

A Yes, I went over my report primarily, the claims of the patent. I -- I looked a little bit at the report from Dr. Ortega, and I spoke to the attorneys yesterday evening when I got here, and just this morning again we were in the same room for an hour or so. 10:07:47 10:07:56 10:08:06 10:08:20 10:08:23 10:08:28

MR. HALPERN: Okay. So I'm going to hand you a copy of your report so that should be marked as Pokharna Exhibit 1. 10:08:29 10:08:40 10:08:44

THE WITNESS: Can I write on this Exhibit 1? 10:08:58 10:08:59

MR. HALPERN: Yes. 10:08:59

THE WITNESS: Okay. Thank you. 10:09:00

MR. THOMAS: Do you have extra copies? 10:09:04

MR. HALPERN: Yes. Thanks. Okay. 10:09:05

MR. THOMAS: Thank you. 10:09:14

(The document referred to was marked by the Reporter as Pokharna Exhibit 1 for identification and is attached hereto.)

BY MR. HALPERN:

Q Do you recognize the document I put in front of you? 10:09:22 10:09:25

A Yes, I do. 10:09:27

Q Okay. And is this your expert witness report on infringement? 10:09:27 10:09:31

A Yes, it is. 10:09:32
Q Okay. So I'm just going to ask you a 10:09:35
little bit about your background. 10:10:06
Where did you go to college? 10:10:16
A I did my undergraduate in India, in Indian 10:10:19
Institute of Technology Bombay, called Mumbai now. 10:10:25
After that, I came to U.S. to pursue my graduate 10:10:34
studies. I came to Purdue University and got my 10:10:37
master's and Ph.D. in nuclear engineering there. I 10:10:41
also have gone to University of Pennsylvania, the 10:10:47
Wharton School of Business. 10:10:52
Q And I notice that your -- you have a 10:10:53
bachelor of science and a master of science from the 10:10:58
Indian Institute of Technology -- 10:11:01
A That's right. 10:11:02
Q -- correct? 10:11:03
A That's right. 10:11:03
Q And both of those degrees are in mechanical 10:11:04
engineering? 10:11:07
A That's right. 10:11:08
Q Okay. Did you have any particular focus 10:11:08
for your bachelor's degree in mechanical 10:11:11
engineering? 10:11:14
A Bachelor's degree is not -- is a broad 10:11:15
degree, and the only focus that comes in is through 10:11:21

the project, as we used to call it, which used to 10:11:25
have a thesis. For that, I had looked at fluid 10:11:30
flows to -- I'm sorry. I take that back. 10:11:39
For my bachelor's degree, it was 40 years 10:11:43
ago almost, I looked at actually some robotic 10:11:46
systems -- design of some robotic systems for my 10:11:51
bachelor's degree. 10:11:56
Q I see. What sort of robotic systems? 10:11:58
A It was -- it was just looking at kinematics 10:12:02
of some closed-chain robots. Yeah, I really 10:12:04
couldn't go too much in detail simply because it was 10:12:12
a bachelor's project, and it was around 40 years 10:12:14
ago. 10:12:17
Q Understood. And what about for your 10:12:17
master's degree, did you -- did you have a focus for 10:12:20
your master's degree? 10:12:23
A Yes. For my master's degree, my focus was 10:12:24
thermal and fluid flow, thermal meaning cooling of 10:12:29
things heat transfer as well as fluid flow, and 10:12:32
specifically there for my master's thesis, I worked 10:12:36
on flow instabilities through nuclear reactors. 10:12:39
Q What fluid is flowing through a nuclear 10:12:45
reactor? 10:12:49
A The kind of reactors that I was looking at 10:12:50
were just water-cooled, maybe heavily water-cooled 10:12:54

so -- 10:12:58
Q And then your Ph.D. is not in mechanical 10:13:05
engineering, but in nuclear engineering, correct? 10:13:09
A That's correct. 10:13:11
Q And the Ph.D. is from Purdue University? 10:13:12
A That's right. 10:13:16
Q Why did you switch from mechanical 10:13:16
engineering to nuclear engineering? 10:13:20
A Actually it's the same field of study. You 10:13:21
know, my advisor was a professor of mechanical 10:13:24
engineering that became head of nuclear 10:13:32
engineering -- 10:13:34
Q I see. 10:13:35
A -- and I was studying heat transfer and 10:13:35
fluid flow which is -- you know, in some schools, it 10:13:38
could be -- in most schools, it is certainly taught 10:13:43
in mechanical engineering department. 10:13:47
Some schools have a separate nuclear 10:13:50
engineering department where they focus more on the 10:13:53
flow and heat transfer specifically encountered in a 10:13:56
nuclear reactor, and then there are also other 10:14:00
fields of study, nuclear fusion, nuclear fission, 10:14:03
and the design of the reactor and, you know, the 10:14:07
nuclear fuel rod design, etcetera, those are also 10:14:12
then part of the nuclear engineering department. 10:14:14

Q And did you write a thesis? 10:14:17
A Yes, of course. For a Ph.D., it's a 10:14:20
requirement. 10:14:23
Q And what was the subject of your thesis? 10:14:23
A Again, it was developing some computation 10:14:25
of fluid dynamics code for multiphase flows through 10:14:32
nuclear reactors. 10:14:37
So essentially you have water that is 10:14:39
coming into the reactor. It becomes steam. So you 10:14:42
have a phase change happening as the liquid is 10:14:47
flowing through the reactor, and my thesis was 10:14:53
developing a specific kind of modeling technique for 10:14:56
that volume water flows through channels. 10:14:59
Q Okay. And then it looks like your first 10:15:03
job after grad school was as a senior mechanical 10:15:40
engineer at Applied Materials, correct? 10:15:46
A That's right. 10:15:47
Q Okay. And what was the product you were 10:15:48
developing there? 10:15:52
A We were developing -- I was working on 10:15:52
chemical vapor deposition, CVD chambers. So Applied 10:15:57
Materials makes refurbed processing tools, and there 10:16:03
are a lot of different techniques that are used in 10:16:07
refurbed processing in a fab. 10:16:09
The team that I was with was developing 10:16:11

sub-atmospheric chemical vapor deposition tools. 10:16:16
THE REPORTER: I'm sorry. Re-deposition?
THE WITNESS: Sub-atmospheric chemical 10:16:23
vapor deposition. 10:16:26
THE REPORTER: Deposition? 10:16:29
THE WITNESS: Deposition, yeah. 10:16:30
BY MR. HALPERN: 10:16:30
Q And did that involve any analysis of fluid 10:16:30
flows? 10:16:38
A Yes, it was fairly complex physics as well 10:16:38
as chemistry that happens in chemical vapor 10:16:44
deposition chamber, and you need to make sure that 10:16:48
the temperatures, the reactions, the flows of 10:16:51
reactants are all uniform or a wafer so that you can 10:16:56
deposit uniform thickness films on those. 10:17:02
So really I was looking at using analytical 10:17:07
techniques as well as experimental techniques to 10:17:10
ensure uniformity of chemical reaction on the wafer. 10:17:13
THE REPORTER: Vapor?
THE WITNESS: On the wafer, w-a-f-e-r, 10:17:28
wafer.
THE REPORTER: I'm sorry?
THE WITNESS: Wafer, w-a-f-e-r.
MR. HALPERN: Wafer.
THE REPORTER: Oh, wafer.

BY MR. HALPERN: 10:17:37
Q So I understand from what you just said 10:17:37
that you were trying to deposit -- you were trying 10:17:40
to ensure uniformity of the chemical reaction across 10:17:49
the wafer which involved thermal uniformity, is that 10:17:54
what you're testifying? 10:17:58
A There are a lot of different things that 10:17:59
need to be uniform. Yes, it used to be at high 10:18:00
temperatures. I couldn't tell you exactly, but it's 10:18:03
more than 200 degrees celsius. 10:18:07
So you need to ensure that the temperature 10:18:13
is within like half a degree or more -- even more 10:18:16
uniform than that across the wafer, and you also 10:18:21
have to ensure that the reactants that are flowing 10:18:25
from outside the chamber are uniformly distributed 10:18:28
so they react such that the film that you are 10:18:33
depositing is of uniform thickness in hundreds of 10:18:37
nanometer kind of uniformity. 10:18:43
Q I see. And are the reactants fluids? 10:18:44
A The reactants are fluids, yes. 10:18:47
Q Okay. So in other words, principles of 10:18:49
fluid flow were involved in that work? 10:18:53
A Yes, there were principles of fluid flow, 10:18:55
and there were things beyond that as it is in any 10:18:59
kind of job. It's a complex system. There were 10:19:02

mechanical designs involved. There were, you know, 10:19:05
fluid flows involved and other systems including 10:19:08
microwave and electronic systems were involved in 10:19:14
those chambers. 10:19:17
Q Okay. And then your next job was at the 10:19:18
Intel Corporation, correct? 10:19:24
A That's correct. 10:19:27
Q Okay. And it says you had overall 10:19:28
responsibility -- I'm reading your resume that's in 10:19:33
your report -- it says you had overall 10:19:36
responsibility for thermal, mechanical technology 10:19:40
development and deployment for Intel's mobile 10:19:43
products group; is that correct? 10:19:47
A That's correct. I joined as an engineer 10:19:49
there and ended up managing a fairly large team, I 10:19:53
think over 25 engineers, which were involved in 10:20:00
developing essentially cooling technologies for 10:20:05
laptop computers primarily, but was also involved 10:20:10
broadly in the company in helping people with 10:20:14
cooling of other kind of computer systems that Intel 10:20:20
was involved in. 10:20:23
Q I see. And what kinds of cooling 10:20:24
technologies did that involve? 10:20:26
A So there were quite a few different 10:20:29
components. In a computer that is used for cooling 10:20:31

today, they include things like thermal interface 10:20:34
materials, heat pipe or vapor chamber-based 10:20:41
technologies which have, you know, phase change 10:20:46
happening inside of them, and just heat exchanges as 10:20:50
well as air movement technologies like fans, but, 10:20:55
you know, those are the technologies that made it. 10:21:01
I was also involved in doing development or 10:21:05
sponsoring USD research on a variety of other 10:21:14
different technologies from liquid cooling to even 10:21:19
using liquid metals in -- in closed loop cooling 10:21:24
system as a coolant to various kinds of 10:21:30
refrigeration technologies. 10:21:36
It was over seven years leading -- you 10:21:38
know, quite a few of them, leading a team of 25 10:21:44
people, maybe with more than ten people with Ph.D.s. 10:21:48
There was a whole lot of things that we were engaged 10:21:51
in at that time. 10:21:55
Q And the liquid cooling that you were 10:21:56
working on or your group was working on there at 10:21:59
Intel, can you just elaborate a little bit on what 10:22:04
sort of liquid cooling that was? 10:22:07
A Yes. So this was something that I actually 10:22:09
was personally involved in in the beginning as an 10:22:12
engineer before I had my management 10:22:15
responsibilities, and we were looking at 10:22:19

single-phase and two-phase liquid cooling where we would have a pump liquid loop that will go over a CPU and then reject heat through a heat exchanger through air.

Q So the liquid loop would go over the CPU, in other words, you would just have like a closed pipe that would pass next to the CPU to withdraw heat from it?

A Yes, I would describe it as cold plate, microchannel cold plate specifically --

Q Okay.

A -- and we were looking at both single phase and two phase, meaning water or the coolant might change its phase while it is being heated, that would be called two phase, or single phase is something where the water does not or the coolant does not change its phase. It just remains liquid throughout.

Q When it was two-phase cooling, what were the two phases of coolant?

A The liquid and the vapor phase.

Q Okay. And then your next position was at k-Technology Corp. where you were vice president of product development, correct?

A That's right.

Q And it says -- your resume says you led many SBIR projects for new product applications based upon the core materials technology; is that correct?

A That's right.

Q So what are SBIR projects?

A SBIR stands for small business innovation research. So by, I guess, a congressional act, any federal agency that spends more than a certain amount -- I forget the exact number -- maybe it's like $50 million in R&D, they need to spend part of that sponsoring work at small businesses as classified by SBC, Small Business Corporation.

So it's a request for proposal from like Department of Defense, Department of Energy, National Science Foundation, Office of Naval Research, Omni Research Lab, etcetera, you write proposals and it's through a competitive process that they would choose to fund certain projects.

Q And what were the new product applications that you worked on at k-Technology?

A They were a variety of things ranging from cooling of really high-powered electric motors in like electrification of the ships, like these will be sort of megawatt power motors with some coolant

inside of that to, you know, cooling of motor drivers, IGBT --

THE REPORTER: I'm sorry. Modal?

THE WITNESS: Motor drivers, like IGBT and diodes, also some channeling wave -- TWTA, I forget what it stands for. It's essentially a microwave kind of thing that is very high powered, used in satellites. So there were -- most of them were essentially either industrial or defense or aerospace-related applications.

BY MR. HALPERN:

Q And what was the materials technology that these were based on, the core materials that you're referring to?

A So k Corp., our main material technology was something called graphite. Graphite is a form of carbon and it can have extremely high thermal conductivity in two directions.

Q When you say "two directions," I'm confused. What do you mean?

A So typically if you take water, right, it has the same -- like a block of a steam, it has the same properties in all three dimensions, like X, Y, and Z direction.

Graphite is an interesting material where

because of its crystalline structure, it has properties in, let's call it, X and Y plane that are the same. But two plane in the Z direction, its properties are very different, orders of magnitude different.

Q Okay. And then your next position was as a VP of applications engineering at Ventiva, correct?

A That's right.

Q Okay. And you -- your CV describes that as a startup developing air moving technology, no moving parts fan, with a licensing business model.

So -- and then there's some more detail there, but can you just explain what that air moving technology is -- was?

A So that air moving technology is a new moving part, a mover where the air is moved not by blades like you would have in a rotating fan, but ionizing the air under very strong electric field, and then moving the ions under an electric field to create an airflow.

Q And this is used in what kinds of products?

A This technology is still under development primarily for use in mobile computing products including laptops as well as variable devices like your -- like your VR, virtual reality headphones --

or sorry -- virtual reality systems, anything where the noise from the fan is annoying to a user.

Q Now, are some of -- I know you have a number of patents, correct?

A That's right.

Q Do some of your patents relate to this technology?

A I may have some filed patents --

THE REPORTER: I'm sorry. Five?

THE WITNESS: Filed patents, like patents that were filed. I don't know if they issued or not. Probably -- I have no recollection if I have issued patents on that technology or not.

BY MR. HALPERN:

Q Okay. In other words, you may have filed patent applications on that technology, but you're not sure if any patents issued from those applications?

A Yes, I was not the core developer of that technology.

Q And it mentions a licensing -- licensing business model.

Was -- would you say that Ventiva was successful in licensing that technology?

A As I mentioned, the product is still

undergoing development. So they are not fully done with the product development phase still.

Q Okay. Then your next position was at Sheetak, if I'm pronouncing that correctly, where you were cofounder, board member, and vice president of business development?

A That's right.

Q And you describe this as a startup applying an innovative Peltier technology for power generation and cooling, correct?

A That's right.

Q Were you the developer of the Peltier technology?

A So there were two parts to our technology. One was the core Peltier material --

THE REPORTER: I'm sorry. Peltier?

THE WITNESS: Peltier, P-e-l-t-i-e-r, material technology, and then the second part was the system technology utilizing the Peltier devices.

So my focus was mostly on the system side of things more than the materials side of things, and, yes, I was one of the core developers on the system side of our technology.

BY MR. HALPERN:

Q And what -- what is the Peltier technology?

A So it's -- you can think of Peltier as a no moving part compressor. It essentially pumps heat from cool side to hot side of a system which is opposite to the natural heat transfer flow, which heat typically flows from hot to cold side.

But if you look at your refrigeration system or air-conditioning systems, they are taking heat from a cold environment and pumping it out to a warmer or a hotter environment, and Peltier -- Peltier systems do that with no moving parts, just by utilizing physical phenomenon called Seebeck effect.

Q I just want to clarify something you just said about refrigeration systems. You said they are taking heat from a cold environment and pumping it out to a warmer or hotter environment, but wouldn't it be accurate to say that they are making the environment cold by removing heat and pumping it out?

A Same thing technically speaking.

Q Okay. And --

MR. THOMAS: Excuse me for one minute. They asked -- the court reporter and the videographer asked for us to enhance the temperature in the room. So the building maintenance guy is

going to come in and we can continue. I just want everybody to be aware of it.

Go ahead. You can do what you've got to do.

MR. HALPERN: Okay.

Q So the system side of the technology that you and your colleagues were developing at Sheetak that you said you worked on, what was -- what did the system side involve?

A So to make an efficient Peltier system, you -- if it is used for refrigeration, you need to reject the heat from the hot side of the Peltier system very efficiently, and in that sense, it is very similar to cooling of computers or cooling of electronics.

With my vast background and experience in computer system cooling, I applied some of those advanced concepts in removing the heat from the hot side of the Peltier system. The examples included using liquid cooling, using heat pipe-based heat sinks in rejecting the heat from the hot side of the -- of the Peltier devices.

Q Okay. And I see that you had -- you had some licensing deals that you made at Sheetak that the company made; is that correct?

A That's right. 10:35:14
Q Does that company still exist? 10:35:15
A Sheetak still exists, yes. 10:35:20
Q Has it been profitable? 10:35:24
A No. 10:35:31
Q Okay. And why do you think it hasn't been profitable? 10:35:31 10:35:33
MR. THOMAS: I'm just going to object on relevance. My other concern is I don't want the witness to be compromised if he's under some obligation of confidentiality about this -- what's going on in this company. So either I'm going to have to take a break and ask him or he can -- 10:35:33 10:35:35 10:35:38 10:35:41 10:35:45 10:35:50
MR. HALPERN: Just don't say anything -- don't reveal anything confidential. 10:35:54 10:35:56
THE WITNESS: Okay. Could you repeat your question again? I'm sorry. 10:35:59 10:36:00
BY MR. HALPERN: 10:36:00
Q Sure. I was just asking -- you said it hasn't been profitable and I was just asking why it hasn't been profitable. 10:36:00 10:36:04 10:36:05
A Yeah, we are trying to fundamentally develop a new material technology and that takes a significant amount of efforts. 10:36:12 10:36:13 10:36:16
On the Peltier systems, the thermal 10:36:20

electric systems, they probably have been -- I'm just going to have a vague wild guess -- about a billion dollars spent on developing those kinds of systems over the last 50 years, but most of them still remain relatively low-efficiency systems. 10:36:25 10:36:27 10:36:30 10:36:34 10:36:37
Q I see. 10:36:43
A So it's not an easy problem to solve. 10:36:43
Q So it's fair to say that that's still an experimental technology? 10:36:45 10:36:47
A That's a very broad statement. The system-level technology using existing Peltiers that we developed was implemented in products. In fact, I created the cheapest refrigeration products in India. It has had mentions in Wall Street Journal, has a, you know, book written on it with a significant focus on that technology, has won numerous awards and so forth and still continues to be sold in developing world. 10:36:49 10:36:53 10:36:56 10:37:01 10:37:05 10:37:09 10:37:13 10:37:17 10:37:19
So I would say it was very successful in that sense, but a lot of the efforts were still to try to develop fundamentally more better materials that could, you know, obviate the need for compressors in an air-conditioner and so forth. 10:37:21 10:37:25 10:37:28 10:37:31 10:37:35
THE REPORTER: I'm sorry. The need for compressors? 10:37:41 10:37:42

THE WITNESS: Obviate the need for compressors. 10:37:43
BY MR. HALPERN: 10:37:43
Q Do you know how many of the ultra cheap refrigerators have been distributed? 10:37:43 10:37:50
A No idea. 10:37:53
Q I mean is it hundreds, thousands, tens of thousands, millions? 10:37:54 10:37:56
A I don't believe it is millions, but it's certainly more than tens of thousands, maybe even more than that. I am not privy to that information. I left the company now almost seven years ago. 10:38:00 10:38:05 10:38:08 10:38:11
Q And do you have -- do any of your patents relate to this technology, your issued patents? 10:38:14 10:38:28
A Again, I was certainly a named inventor on some of the applications there. I have not kept track if those have issued or not. 10:38:31 10:38:38 10:38:41
Q Okay. And then your next position, which is where you still are, is that Inficold India; is that correct? 10:38:47 10:38:49 10:38:55
A That's right. 10:38:55
Q Okay. And what does Inficold do? 10:38:56
A So Inficold is in the business of using thermal energy storage systems. So it's a thermal battery where you are storing energy in the form of 10:39:01 10:39:09 10:39:15

cooling to use it later when there is no power source available. 10:39:19 10:39:25
So, for example, if you only use solar energy and provide cooling, let's say, air-conditioning in this room in the night, you have two options. Either you store them in an electric battery or you store it in a thermal battery. 10:39:26 10:39:29 10:39:32 10:39:35 10:39:38
What we do is we do the cooling when power is available, use that cooling to cool a certain media inside of a thermal battery, and then utilize that cold media to provide cooling during the nighttime. 10:39:42 10:39:44 10:39:50 10:39:55 10:39:58
For example, we -- our cold products there are systems that are configured for chilling milk and systems that are configured for chilling fruits and vegetables or fish, meat, etcetera, kept in sort of a warehouse. 10:40:00 10:40:04 10:40:07 10:40:11 10:40:16
We have done systems that were used for air-conditioning, but that's not the current focus of the company. 10:40:19 10:40:21 10:40:25
Q And how is the cooling achieved in that product? What sort of cooling is it? 10:40:26 10:40:31
A So the cooling is done using a compressor, but in the thermal battery, we, you know, have to freeze a media and efficiently bring heat in or 10:40:32 10:40:38 10:40:42

remove heat from that media. 10:40:48
So that requires a lot of fluid flow 10:40:50
principles in terms of efficiently distributing the 10:40:54
heating or efficiently distributing the coolant 10:40:57
through that thermal storage system. 10:41:01
Q And how has -- how has that company done? 10:41:12
A It's doing reasonably okay. You know, we 10:41:23
have installed systems in almost every state in 10:41:28
India and, you know, in many countries in Africa, 10:41:32
also in Southeast Asia. There is a very good demand 10:41:39
for the products. 10:41:44
We are engaged with, you know, the Royal 10:41:45
Bank and many of the international agencies in 10:41:49
trying to improve the post-harvest management of, 10:41:52
you know, fruits, vegetables, fish, etcetera. 10:41:55
Q Has that company been profitable yet? 10:42:05
A So I believe last year we did have a small 10:42:09
profit, and this year, the financial year in India 10:42:13
will get over in March 31st, and I believe that we 10:42:17
will have a small profit again this year also. 10:42:21
Q You know, I missed one of your positions 10:42:25
which appears you still hold which is Deeia? 10:42:36
A Right. 10:42:38
Q Okay. Where you were a principal? 10:42:39
A Uh-huh. 10:42:42

Q And it says you do thermal consulting 10:42:43
there? 10:42:48
A That's right. 10:42:48
Q Okay. With several companies. 10:42:49
And what does the thermal consulting, what 10:42:51
sort of technologies are you consulting on? 10:42:54
A Not limiting on anything, anything that, 10:42:56
you know, people are interested in, right. 10:43:02
So I have consulted there with people on, 10:43:05
you know, design of some laptops in the beginning 10:43:13
because that's where a lot of my background was, 10:43:18
right, but I've done things like LED lights. I have 10:43:21
done, you know, consulting for people who are 10:43:24
designing some new consumer electronic devices. 10:43:29
I have done consulting for people, you 10:43:33
know, who are interested in even immersion cooling 10:43:36
systems. I have done consulting for people who are 10:43:40
doing liquid cooling systems, you know, almost all 10:43:43
kinds of things, material technologies, quite a bit 10:43:47
of that is in material technologies, also 10:43:50
heat-sinked designs. It's a very broad variety of 10:43:53
things that I have done there. 10:43:58
Q And in your consulting on immersion cooling 10:44:01
systems, what aspects of immersion cooling systems 10:44:06
did that involve? 10:44:10

A Just people trying to understand how much 10:44:11
additional benefit they may have if they were to use 10:44:16
immersion systems. 10:44:20
Q As compared to what? 10:44:22
A As compared to air-cooled. 10:44:23
Q I see. And what did you -- what have you 10:44:25
found to be the benefit of immersion cooling as 10:44:28
compared to air cooling? 10:44:32
A Yeah. I mean that -- specifically for that 10:44:32
client, I couldn't get into that. In general, you 10:44:35
know, immersion cooling systems simply because of 10:44:40
higher thermal conductivity as well as higher heat 10:44:45
capacity, your specific heat capacity like mass flow 10:44:49
times heat capacity being larger, it can help in 10:44:54
keeping the temperatures of some of the heat sources 10:44:59
to be within specification. 10:45:05
So it's another cooling technology for, you 10:45:08
know, cooling off chips. There are a variety of 10:45:13
them, and each of them has their pluses and minuses. 10:45:17
Q I see. Have you found that when you are 10:45:21
talking to people -- well, is it fair to say that 10:45:39
since you're consulting on immersion cooling versus 10:45:42
air cooling, that the people who are considering 10:45:46
immersion cooling also regard air cooling as an 10:45:50
option that they may use? 10:45:53

A Of course, right. It depends on what 10:45:58
performance you want to operate your systems at and, 10:46:00
you know, what reliability you want it at, right. 10:46:03
Everybody in a system has a different design 10:46:07
objective. 10:46:09
You know, you can achieve a design 10:46:15
objective by using a lot of different options. 10:46:17
Again, the cost may be different. The reliability 10:46:20
may be different. The size may be different. The 10:46:22
acoustics of the noise may be different from those, 10:46:24
right, but given no constraints like that, right, it 10:46:28
is possible to achieve cooling a lot of different 10:46:33
ways. 10:46:36
Q I see. I mean are there any applications 10:46:36
for which you have advised people that air cooling 10:46:39
is not suitable, and they should use immersion 10:46:42
cooling or some other form of cooling? 10:46:47
A That wasn't the part of my objective in 10:46:49
this, you know, concerting project that I had with 10:46:54
this company. The focus was slightly different. It 10:47:01
was more about feasibility and things like that. 10:47:06
Q Now, you mention a Loop Thermosyphon 10:47:14
technology that you developed or that was -- let me 10:47:17
first ask, your resume says that a new Loop 10:47:21
Thermosyphon technology was developed at Deeia. 10:47:29

Did you personally develop that or was that 10:47:31
a group? Was it other folks at Deeia? 10:47:33
A No, it was mostly by myself. I certainly 10:47:36
used some external places to get things made. 10:47:40
Q Right. 10:47:45
A I believe I just got issued patent on -- on 10:47:46
that technology in the last six months or so. 10:47:51
Q Okay. Can you describe the Loop 10:47:53
Thermosyphon technology that you developed? 10:47:58
A So it's a closed loop system, hermetically 10:48:03
sealed, where you have some phase change happening 10:48:08
at the heat source, and you essentially -- by "phase 10:48:12
change," I mean the liquid turning into vapor. 10:48:16
The vapor flows over to some other section 10:48:19
that has a heat exchanger there to reject the heat 10:48:25
to the environment. So that removes the heat from 10:48:29
the vapor. It turns back into liquid, and then 10:48:31
there is a small height difference between where 10:48:34
evaporation is happening versus where the 10:48:38
condensation is happening. 10:48:40
So the condensed liquid comes back through 10:48:42
a separate line back to where the evaporation is 10:48:45
happening. So in this way, you can move heat from 10:48:49
heat source, like your CPU or an ASIC to a heat sink 10:48:52
where you may have a fan and a heat exchanger to 10:48:57

reject the heat. 10:49:01
Q So this would be used within a laptop or a 10:49:02
desktop computer? 10:49:05
A The primary focus of that technology was 10:49:06
data centers -- 10:49:10
Q Okay. 10:49:11
A -- in a server. 10:49:13
Q So it's used in a server within a data 10:49:14
center? 10:49:17
A That's right. 10:49:17
Q Okay. It's not a technology that is 10:49:17
spanning the length of a data center, correct? 10:49:21
A No, no, it's within the server to reject 10:49:24
the heat from the CPU and the server. 10:49:27
Q And you're also at Deep-Materials where you 10:49:36
were the founder and CEO, correct? 10:49:39
A That's right. 10:49:40
Q That company develops -- how many other 10:49:51
people are at Deep-Materials besides you? 10:49:53
A In the United States, I'm the only person. 10:49:56
As an employee, I have some consultants and 10:49:59
contractors here in the U.S., but I have a few 10:50:04
different entities in China depending on the 10:50:10
location. In China, each location, I need to have a 10:50:12
separate entity. 10:50:15

So I have two entities that are joint 10:50:16
ventures with other companies where I may have like 10:50:20
30 or 40 employees total in those joint ventures, 10:50:24
and then I have another joint venture company which, 10:50:28
you know, is in the hiding phase right now, bringing 10:50:34
up the factory right now. 10:50:38
So that right now has only two employees, 10:50:40
but we are going to hire maybe about 15 employees 10:50:42
then there. Then I also have an R&D team that is in 10:50:45
a separate entity based out of India. 10:50:49
Q And that company Deep-Materials develops 10:50:51
you say high thermal conductivity dispensed silicone 10:50:57
TIMs, correct? 10:51:01
A That's right. And there are some more 10:51:02
things also that we do, not just silicone based now, 10:51:06
we also do non-silicone-based thermal interface 10:51:10
materials or TIMs. 10:51:14
Q Okay. And what are the non-silicone-based 10:51:15
TIMs based on? 10:51:20
A The ones that we are developing are for -- 10:51:21
they are metallic thermal interface materials, and 10:51:26
they are being tested both in immersion cooling and 10:51:30
in air cooling. 10:51:33
Q And are these -- you mention that they're 10:51:35
used in consumer electronics, computing, and 10:51:41

automotive parts, correct? 10:51:45
A The silicone-based products right now are 10:51:46
being used in quite a few different consumer 10:51:49
electronic systems, also automotive systems, also 10:51:52
now computer systems, high-performance liquid 10:51:57
cooling systems. 10:52:01
So maybe my resume is a little bit outdated 10:52:03
right now as I realize. Like, you know, we have 10:52:06
expanded in the last few months quite a few 10:52:08
different markets and new customers. 10:52:11
Also they are being used in data centers 10:52:20
and some of the components that go in data center, 10:52:22
this is a material that is used inside of some other 10:52:26
component, other module of some sort, right, 10:52:29
especially memory modules, RSJ drive modules, these 10:52:32
materials have been used. 10:52:37
Q So it would be used inside the servers, for 10:52:38
example, inside a data center? 10:52:42
A That's right. 10:52:43
Q So is it fair to say that all of the 10:52:44
different applications of these thermally conductive 10:52:54
gels are in, you know, things that are the size of a 10:52:57
server or smaller? 10:53:00
A They also have been tested in automotive 10:53:04
systems, in immersion cooling systems. In fact, 10:53:10

Intel did a -- a conference presentation where they shared results from our metallic thermal interface materials in immersion-cooled system and found them to be the highest performance thermal interface material for immersion cooling that they have tested. 10:53:18 10:53:29 10:53:33 10:53:36 10:53:40 10:53:41

Q How are they used in immersion cooling? 10:53:42

A They are used between the chip and the heat sink, the heat source, like, you know, an ASIC or a CPU in Intel's case or an AI processor or a GPU, between that and the heat sink that goes on top of that, in between those two things, you need a thermally conductive media to efficiently conduct heat away from the heat source, the CPU or the GPU to the heat sink. 10:53:45 10:53:49 10:53:52 10:53:58 10:54:01 10:54:04 10:54:08 10:54:12

Q Okay. So this is a broad question, but in the course of your career, what are some of the fluids you've worked with for cooling? 10:54:13 10:54:30 10:54:32

A First one, air, most common, okay. 99.999 percent of things are cooled by air, okay, looked at water, glycol, nanofluids, electrically conducting fluids, like liquid metal electrically insulating fluids like, you know, mineral oils or PAO -- 10:54:40 10:54:47 10:54:53 10:55:00 10:55:06

THE REPORTER: I'm sorry. Like what?

THE WITNESS: Electrically insulating

liquids like PAO or mineral oils. Then let's see. Some of the more zany things might be some gases, like helium that we were using in semiconductor equipment. There's a whole variety of things over the last 30 years that, you know, I have looked at. 10:55:12 10:55:19 10:55:25 10:55:33 10:55:37

BY MR. HALPERN: 10:55:44

Q Okay. Turning back to your report Exhibit 1, does this report contain all of your opinions that you intend to offer at trial in this case? 10:55:44 10:55:58 10:56:02 10:56:07

A It contains all of my opinions based on where we are in the process. If there is some new report that comes out or, you know, always there is some clarification that will come out in these proceedings through deposition and so forth, right, where I may look to further explain my positions. 10:56:07 10:56:15 10:56:19 10:56:24 10:56:30 10:56:33

Q But you don't know -- other than -- I mean you're not planning to offer opinions in this testimony that are not in your report, right, new opinions? 10:56:44 10:56:51 10:56:53 10:56:55

A No, I am not planning on that. 10:56:56

Q Okay. And are there -- do you know of any opinions that you plan to present at trial that are not in this report? 10:56:58 10:57:00 10:57:03

A Frankly, I have not thought about that yet 10:57:07

but I believe that this report is -- forms the basis of my analysis on infringement. 10:57:13 10:57:18

Q Is there anything in the report that you would -- having reviewed the report in preparation for this deposition, is there anything in the report that you would like to correct? 10:57:26 10:57:29 10:57:31 10:57:33

A There are a few small typos. Like, in some places lip is spelled as l-o-p. You know, maybe there are a couple of different locations. 10:57:38 10:57:42 10:57:47

But -- and then in one place, I noticed that, you know, M70 and M30, the two of the tanks that are used by Rhodium, I think in one location, it was misstated as one of the -- or the other, but that was very clear based on like, you know, all the discussion is happening about M70 and then suddenly there is -- no, sorry -- all the discussion was about M30 and there is suddenly an M70 that shows up there, but those are just minor typos that are pretty evident from the context that they are typos. 10:57:49 10:57:52 10:57:59 10:58:04 10:58:10 10:58:12 10:58:15 10:58:17 10:58:21 10:58:24

Q And is your list of materials reviewed complete, meaning you listed everything -- in your materials reviewed, you listed everything that you reviewed? 10:58:34 10:58:37 10:58:40 10:58:43

A Yes. 10:58:43

Q So there's nothing that you reviewed and considered in forming your opinions, but did not include on your list of materials reviewed, correct? 10:58:43 10:58:49 10:58:52

A That's correct. 10:58:54

Q Your list of materials reviewed -- and we can refer to it if you would like to refresh your recollection, but I believe it includes Midas's infringement contentions. I believe it's Exhibit 3. 10:58:57 10:59:02 10:59:05 10:59:09

MR. THOMAS: Do you have a page number that you can refer us to? 10:59:28 10:59:30

MR. HALPERN: Well, no, because the exhibits have their own pagination. 10:59:32 10:59:32

MR. THOMAS: Okay. 10:59:35

MR. HALPERN: Yeah, but I believe it's Exhibit 3. 10:59:36 10:59:38

(The document referred to was marked by the Reporter as Pokharna Exhibit 3 for identification and is attached hereto.)

BY MR. HALPERN: 10:59:55

Q Okay. I've got it. Do you have it? 10:59:55

A Yes, I do. 10:59:58

Q Okay. So it does mention Midas's infringement contentions. They're just listed as final infringement contentions. 10:59:59 11:00:19 11:00:28

Do you see that? 11:00:30

A I see that. 11:00:30

Q So you did review Midas's infringement contentions and consider them in preparing this report? 11:00:30 11:00:34 11:00:37

A Yes. In preparation of the report as well as forming my opinions, over time I had looked at a lot of the materials and all of the things that I have reviewed are listed here in this case. 11:00:37 11:00:39 11:00:43 11:00:45

Q Now, your list of materials reviewed does not mention a document called "Plaintiff's Supplemental Response to Interrogatory No. 10" -- so that would be from Midas -- "Plaintiff's Supplemental Response to Interrogatory No. 10," dated March 15, 2023. 11:00:50 11:00:53 11:00:56 11:01:00 11:01:04 11:01:07

Okay. I don't see that on the list, and so I infer from that that you did not consider that material? 11:01:11 11:01:14 11:01:17

MR. THOMAS: Yeah. The report is dated December 22. So I'm sorry. You said March 15, 2023? 11:01:17 11:01:19 11:01:24

MR. HALPERN: Yeah. 11:01:24

MR. THOMAS: Okay. Okay. 11:01:25

MR. HALPERN: March of this year hasn't happened, right. 11:01:25 11:01:29

Q So is that correct, that that item -- and I can show it to you. 11:01:30 11:01:34

A Perhaps it might help me, yeah. 11:01:37

MR. HALPERN: Yeah, not those -- okay. Great, thank you. So this will be Pokharna Exhibit 2. I need another copy for counsel and one for me. 11:01:41 11:01:50 11:01:53 11:02:20

(The document referred to was marked by the Reporter as Pokharna Exhibit 2 for identification and is attached hereto.)

BY MR. HALPERN: 11:02:23

Q Okay. I realize you're reviewing, but I'll just pose a question. 11:02:23 11:02:59

Do you recall seeing this document before? 11:03:00

A It doesn't jump up as something that I have studied in detail. 11:03:02 11:03:07

Q Do you know if you've seen it at all -- or let me -- I mean not a trick question. 11:03:09 11:03:14

It's not listed as something you've considered so -- 11:03:15 11:03:17

A Right. Yeah, it does not -- it does not ring a bell, certainly not in the detail. It may be -- I have not listed it here and it certainly is not something that I have studied in detail, so most likely I have not looked at it. 11:03:18 11:03:25 11:03:30 11:03:36 11:03:40

Q Okay. Now, you also list various Rhodium interrogatory responses as items that you 11:03:42 11:03:57

considered. For example, on -- it's not numbered, but I mean it's on the first page of your materials considered, you list Rhodium's supplemental responses and objections to rogs, and then on the next page, there's Rhodium's further supplemental responses to rogs 1, 3 to 6, 10, 13, 15. 11:04:04 11:04:07 11:04:10 11:04:16 11:04:27 11:04:30

A Yep. 11:04:35

Q Okay. So do you recall looking at Rhodium's interrogatory responses? 11:04:36 11:04:38

A I've looked at a lot of different rogs and, you know, sitting here right now, I just can't tell you if I looked at that particular one and what that says on 1, 3 to 6, 10, 13, 15, etcetera. 11:04:41 11:04:49 11:04:52 11:04:56

Q Okay. Well, I may put it in front of you, but I just want to ask generally, when you reviewed the Rhodium interrogatory responses that described their systems at Temple, at Rockdale, how they were hooked up, what parts they contained and so on, how they operate, did you conclude that any of Rhodium's answers describing those things, what was present, how it was connected, how it operates, did you conclude that any of Rhodium's answers were inaccurate? 11:05:04 11:05:07 11:05:12 11:05:18 11:05:23 11:05:27 11:05:32 11:05:36 11:05:39 11:05:41

MR. THOMAS: I'm just going to object on no foundation. 11:05:50 11:05:52

THE WITNESS: So I think I would differ in my opinion on some of the way they would describe their systems. 11:05:58 11:06:02 11:06:04

They use different language, you know, and also this is a pretty broad question about like tens of thousands of pages probably. So to say that, you know, was it anything that I thought is factually inaccurate, I'm sure there were things that I felt that I would not describe it that way. 11:06:06 11:06:09 11:06:13 11:06:16 11:06:21 11:06:24

But, in general, they are trying to describe broadly how things are hooked up, where the tanks are, and the liquid is going and so forth. I think that is fundamentally correct, but, you know, the details on each of those as to, you know, how things are distributed, where the coolant may end up, and how it may end up, some of those things I might differ. 11:06:28 11:06:30 11:06:34 11:06:38 11:06:44 11:06:49 11:06:55 11:06:59

BY MR. HALPERN: 11:06:59

Q Do you recall any specific points where you differed with one of the interrogatory responses? 11:06:59 11:07:03

MR. THOMAS: Objection; vague and ambiguous. 11:07:06 11:07:11

THE WITNESS: Sitting here right now, I could not, you know, recall my study of thousands of pages and specify -- and specifically remembering 11:07:11 11:07:13 11:07:17

something. 11:07:21
BY MR. HALPERN: 11:07:22
Q I don't think the rog responses were 11:07:22
thousands of pages, but I -- I -- the entirety of 11:07:24
the materials were lengthy, I -- that you reviewed, 11:07:28
I understand. 11:07:31
Okay. So I'd like the supplemental rog 11:07:32
response -- yes -- no, no, no, this is -- I'm 11:07:47
wondering if I handed you the wrong exhibit. 11:08:09
MR. THOMAS: You're talking about 11:08:12
Exhibit 2, Counsel? 11:08:13
MR. HALPERN: Yeah. 11:08:14
MR. THOMAS: Exhibit 2 is marked as 11:08:14
"Defendants' Third Supplemental Responses to 11:08:16
Plaintiff's First Set of Interrogatories." 11:08:18
MR. HALPERN: Okay. So I asked you a 11:08:21
question about that exhibit. What's that? 11:08:23
Can we go off the record? We've been going 11:08:32
about an hour. 11:08:34
THE VIDEOGRAPHER: Going off the record, 11:08:35
the time is approximately 11:08 a.m. 11:08:36
(Recess taken.) 11:20:30
THE VIDEOGRAPHER: Going back on the 11:20:31
record, the time is approximately 11:21 a.m. 11:21:39
MR. HALPERN: Okay. So I am going to 11:21:46

clarify something with reference to Exhibit 2. 11:21:48
So Exhibit 2 is "Defendants' Third 11:21:56
Supplemental Responses and Objections to Plaintiff's 11:21:59
First Set of Interrogatories," and I am about to ask 11:22:02
the witness some questions about Exhibit 2. 11:22:07
I earlier asked the witness questions about 11:22:09
Exhibit 2 in reference actually to a different but 11:22:11
similarly titled document, which are "Plaintiff's 11:22:17
Supplemental Responses to Interrogatory No. 10," and 11:22:20
so that document is -- is on its way here. 11:22:24
So I will reask those questions in a few 11:22:32
minutes when we have that document, but for the 11:22:36
moment, I'll proceed with questions about Exhibit 2. 11:22:39
So if you -- in Exhibit 2 which is 11:22:50
"Defendants' Third Supplemental Responses and 11:22:53
Objections to Plaintiff's First Set of 11:22:56
Interrogatories," if we can look at pages 9, 10, 11, 11:22:59
and 12, and let me know when you've had a chance to 11:23:16
review those, and I will proceed. 11:23:22
A 9, 10, 11, and 12, did you say? 11:24:24
Q Yeah, pages 9, 10, 11, and 12. 11:24:27
MR. THOMAS: And to clarify the record 11:24:32
further, this document is identified on his index of 11:24:33
documents that he reviewed when he prepared the 11:24:37
report. 11:24:40

MR. HALPERN: Yes, correct. Yes, I don't 11:24:40
think this document is identified by title, but I 11:24:41
believe it just says defendants' responses to 11:24:45
interrogatories. 11:24:47
MR. THOMAS: I don't have it in front of 11:24:49
me. I'm not sure how it is identified. 11:24:50
It says, "Rhodium's Third Supplemental 11:24:56
Responses to Interrogatories." 11:24:58
MR. HALPERN: So then, yes, this is 11:25:00
identified. 11:25:01
MR. THOMAS: Okay. 11:25:01
THE WITNESS: I have quickly perused it and 11:25:05
then depending on the questions, I might take some 11:25:08
more time and review it in depth. 11:25:11
BY MR. HALPERN: 11:25:13
Q That's absolutely fine. Do you see 11:25:13
anything in these responses that I just directed you 11:25:15
to that you concluded was inaccurate when you were 11:25:21
preparing your report? 11:25:26
A Again, there is a lot of detail here and it 11:25:37
references a lot of other things, and without having 11:25:42
to recreate all of that, it's -- I'm not aware of 11:25:44
anything right now that I think is incorrect. 11:25:54
Q Okay. And, you know, again, there's no 11:25:56
hidden agenda. 11:25:59

When you -- in your report, you 11:26:00
characterized, for example, the Prime Controls 11:26:02
system as an installation that was not completed, 11:26:05
and this document describes in more detail how that 11:26:11
installation was incomplete. 11:26:16
And so it appeared to me from your report 11:26:17
that you were adopting the information here that it 11:26:20
was not a complete installation, but you just didn't 11:26:24
provide all the details of that. 11:26:27
And so I just was trying to confirm that, 11:26:29
you know, you looked at this, and you relied on it 11:26:33
in describing the incomplete Prime Controls 11:26:37
installation? 11:26:42
A That's correct. 11:26:43
Q Okay. All right. Now, if we have 11:26:44
plaintiff's -- okay. 11:26:58
So now we have Exhibit -- what I'm going to 11:26:59
give the witness as Exhibit 3. Please put aside 11:27:01
Exhibit 2 for the moment. I may come back to it. 11:27:05
And do you see that Exhibit 3 is 11:27:30
"Plaintiff's Supplemental Response to Interrogatory 11:27:32
No. 10"? 11:27:37
A Yes. 11:27:38
Q Okay. So this is the document I was 11:27:38
referencing earlier, even though I handed you the 11:27:42

wrong document, and I represented to you that this 11:27:46
document is not identified as a document that you 11:27:55
considered in preparing your report. 11:27:59
And so if you don't mind having a look at 11:28:03
pages -- I mean the whole thing was not -- you know, 11:28:13
not listed but particularly pages 3 to 5 contain 11:28:17
some material in response to defendants' 11:28:24
interrogatory number 10, and I just want to have you 11:28:30
look at it and confirm that you did not consider 11:28:35
this in the preparation of your report. 11:28:37
A While I might not have considered this 11:28:39
report, I am certainly aware of Temple having the 11:29:05
Grundfos pumps and some of this --
THE REPORTER: I'm sorry. What pumps?
THE WITNESS: The Grundfos, 11:29:18
G-r-u-n-d-f-o-s, pumps to pump the dielectric liquid 11:29:20
in the tanks. 11:29:29
So, again, I may not know all the details 11:29:33
of what is written here. Some of the information 11:29:39
I'm familiar with simply because I have personally 11:29:40
inspected some of these facilities. 11:29:45
And did you want me to read page 10 as 11:29:48
well? 11:29:51
BY MR. HALPERN: 11:29:51
Q No, there's nothing on page 10 in this 11:29:51

document. 11:29:57
A I'm sorry. Page 4, I'm sorry. I don't 11:29:58
know where page 10 came from. 11:30:00
Q That's okay. Yes, pages 3 through 5. 11:30:02
A 3 to 5.
Q I'm just trying to confirm since you did 11:30:07
not list it that you did not consider this material 11:30:09
in preparing for your report. 11:30:12
A Again, just like I said earlier, I have 11:30:42
personally been to Rockdale facility as well and I 11:30:45
have seen the VFD controllers by Eaton and so forth. 11:30:49
So while, again, I may not have relied on all the 11:30:56
details that are there in this rog, I certainly have 11:30:59
been familiar with some of the information that is 11:31:05
here. 11:31:07
Q Is it fair to say since this is not listed 11:31:07
as a document that you considered, that you may be 11:31:10
aware of some information that is in here from other 11:31:15
sources, but that you did not rely on this document? 11:31:19
A Right, not specifically on this document. 11:31:23
The other sources, some of them have been personal 11:31:27
observation that I made while I was visiting the 11:31:31
site. 11:31:34
Q And to the extent that you made personal 11:31:34
observations of equipment while visiting the site, 11:31:36

that is reflected in your report? Those facts that 11:31:41
you collected by observation of the site, you've put 11:31:43
those in your report; is that correct? 11:31:47
A The report is a subset of what all I know, 11:31:51
right. I mean in -- in the context, whatever was 11:31:57
required, I have provided that in the report. 11:32:01
There may be other things that I obviously 11:32:06
observed. I cannot recollect every single detail 11:32:08
that I saw there. Here it's just in the context of 11:32:11
what we are talking about, and the report is what I 11:32:15
have provided. 11:32:18
Q So is it fair to say that your report 11:32:18
provides the facts -- the relevant facts that you 11:32:21
observed or learned that support your opinions? 11:32:27
A That's in general correct. 11:32:34
Q Okay. And given that you did not list it 11:32:36
in your report, is it a fair inference that you did 11:32:52
not look at this particular document prior to today? 11:32:57
A I don't believe I have seen this document 11:33:01
prior to today. 11:33:04
MR. HALPERN: Okay. All right. Okay. I'd 11:33:05
like to give you another exhibit which will be 11:33:15
Midas's infringement contentions. 11:33:20
Okay. Great. So we at least have staples
attached. So this will be Exhibit 4. That one

staple didn't go all the way through here. We'll
give you this one.
MR. THOMAS: Thank you.
MR. HALPERN: Sure.
(The document referred to was marked by the
Reporter as Pokharna Exhibit 4 for identification
and is attached hereto.)
BY MR. HALPERN: 11:33:51
Q And do you see the document I put in front 11:33:51
of you which will be Pokharna Exhibit 4 is titled 11:33:54
"Final Infringement Contentions"? 11:34:00
A Yes. 11:34:03
Q And do you recognize these as the Plaintiff 11:34:04
Midas Green Technologies final infringement 11:34:14
contentions? 11:34:17
A Yes. 11:34:18
Q Have you seen this document before? 11:34:20
A Yes, I have. 11:34:22
Q Okay. And I'd like to direct you to pages 11:34:22
13 to 14 of this document. Let me know when you've 11:34:43
had a chance to review those. 11:35:10
A I have reviewed 13 and 14. 11:35:47
Q Okay. Do -- now page -- pages 13 and 14 11:35:52
address the limitation "a secondary fluid 11:36:03
circulation facility adapted to extract heat from 11:36:09

the dielectric fluid circulating in the primary circulation facility and to dissipate to the environment the heat so extracted." 11:36:11 11:36:14 11:36:17

Do you see that? 11:36:19

A Yes, I do. 11:36:20

Q And then on the right side is some material that Midas provided to show infringement of that limitation. 11:36:20 11:36:26 11:36:34

Do you see that? 11:36:35

A I do. 11:36:35

Q Do these pages, pages 13 and 14, mention the Kelvion cooler? 11:36:36 11:36:43

A I don't believe they mention the Kelvion cooler. 11:36:46 11:37:08

Q Okay. Do they mention any of the specific components of the Kelvion coolers that you discuss in your report? 11:37:08 11:37:10 11:37:12

A They discuss the dry cooler or adiabatic fluid cooler or similar cooling devices or device, and that is referring to the Kelvion cooler or the cooler. 11:37:48 11:37:56 11:38:04 11:38:16

There is a separate cooler that is used on Temple facility -- or I'm sorry. I may be mixing up my facilities. The cooler that is used in the other facility is not by Kelvion. 11:38:17 11:38:25 11:38:27 11:38:30

Q I believe you're referring to the Guntner? 11:38:34

A The Guntner cooler, Guntner cooler, yeah. 11:38:36

Q Do these pages mention the Guntner cooler? 11:38:38

A No, these pages are referring to -- when they talk about the dry cooler, adiabatic fluid cooler, or similar cooling device. 11:38:41 11:38:44 11:38:49

Q Okay. So that is the only reference to the Kelvion -- well, I don't want to agree that it's a reference to them, but the only thing that you're identifying as a reference to the Kelvion coolers or the Guntner coolers is this -- the following language: The secondary fluid circulation facility includes a dry cooler, adiabatic fluid cooler, or similar cooling device; is that correct? 11:38:52 11:38:55 11:38:59 11:39:01 11:39:04 11:39:06 11:39:10 11:39:13

A That, along with the schematics that I provided on page 14 top, are also showing those dry coolers on the left-hand side of both of those pictures. 11:39:16 11:39:21 11:39:28 11:39:31

Q And are those depictions of dry coolers on the left-hand side of the Kelvion cooler specifically? 11:39:32 11:39:35 11:39:38

A They are schematic, not really an actual drawing of the product. They are referring to the function that is provided by the Kelvion cooler or the Guntner cooler. 11:39:45 11:39:52 11:39:57 11:40:00

Q Right. So in other words, I think it's fair to say -- tell me if you disagree -- that when you say a dry cooler, adiabatic fluid cooler, or similar cooling device, you're saying there's some sort of dry cooler, correct, that's describing a category of dry cooler? 11:40:01 11:40:03 11:40:05 11:40:10 11:40:13 11:40:16

A Yes, as a -- as a way to reject the heat to the environment. 11:40:20 11:40:27

Q And then on the left side of the drawings of the R30 and R70 system on page 14, there's a -- essentially a schematic representation of a dry cooler, but it's not one of the specific dry cooler products that you talk about in your report; is that correct? 11:40:27 11:40:30 11:40:35 11:40:38 11:40:41 11:40:43

A Yes, these are schematics and not the actual detailed pictures or the drawings of the specific coolers that are used in these two facilities. 11:40:44 11:40:49 11:40:53 11:40:55

Q Okay. And then the various components of the dry cooler that you discuss, specific components of the Kelvion and Guntner coolers, those are also not discussed in the infringement contentions, correct? 11:40:56 11:41:00 11:41:02 11:41:06 11:41:12

A I'm sorry. Could you just repeat the question, please? 11:41:12 11:41:15

Q Yes. The various specific components of the Kelvion and Guntner dry coolers that you discuss in your report, those are not discussed in the infringement contentions, correct? 11:41:16 11:41:19 11:41:23 11:41:26

A My expert report goes deeper in describing that than what is there on this page 13 and 14. 11:41:31 11:41:34

Q Well, does page 13 -- does page 13 or 14 mention any specific components of the dry cooler other than dry cooler, adiabatic fluid cooler, or similar cooling device? 11:41:39 11:41:44 11:41:49 11:41:54

A They go on to explain that they are adapted to extract heat from the dielectric fluid and dissipate the extracted heat to the environment, right, and then, you know, it also refers to some other documents. 11:41:56 11:42:02 11:42:05 11:42:08 11:42:16

And obviously sitting here, I do not recall exactly what detail was there in those documents, but those documents are, I believe, incorporated here by, you know, just referencing to them, and I do not know sitting here if those documents describe any components of those dry coolers. 11:42:16 11:42:19 11:42:21 11:42:24 11:42:30 11:42:34

Q That's fair, but in terms of what is in front of you on pages 13 and 14, there's no mention of other components of the Kelvion or Guntner dry coolers apart from the description that the 11:42:38 11:42:40 11:42:45 11:42:50

secondary fluid circulation facility includes a dry cooler, adiabatic cooler, or similar cooling device; is that correct? 11:42:57 11:43:01 11:43:05

MR. THOMAS: I'll just object. The document speaks for itself. 11:43:07 11:43:08

THE WITNESS: If I look at the schematic for the R70 system, you know, I would conclude that there are some fans there, but they are not specifically mentioned in this document. 11:43:10 11:43:13 11:43:18 11:43:23

BY MR. HALPERN: 11:43:31

Q Does it show the fans? 11:43:31

A Yes, so the round things on top in a dry cooler would represent a fan. 11:43:32 11:43:38

Q Oh, I'm sorry, yes, the lower drawing. 11:43:41

A The R70, yes. The upper drawing is for R30 system. 11:43:43 11:43:49

Q Yes. Does the R30 system also have fans? 11:43:49

A Yes. 11:43:56

Q But they're not shown in the R30 schematic here? 11:43:57 11:44:00

A Like I mentioned, this is just a schematic to describe the overall piping diagram if I recall correctly, you know, and it does not go into detail about the design of the dry coolers itself. 11:44:02 11:44:05 11:44:08 11:44:12

But as a person of ordinary skill in the 11:44:16

art would know that, in a dry cooler, you would need a heat exchanger. You would need air mover to move air. You may also need some water if it is a wet cooler. 11:44:20 11:44:23 11:44:28 11:44:37

THE REPORTER: A direct cooler?

THE WITNESS: If it is a wet cooler.

THE REPORTER: Wet? 11:44:41

THE WITNESS: Yeah. 11:44:41

BY MR. HALPERN: 11:44:41

Q Okay. Now, I'd like to direct you to pages 14 to 15. So this is the same document, Exhibit 4, Midas's infringement contentions, and this is -- now I'm directing you to the material provided for the limitation, "a control facility adapted to coordinate the operation of the primary and secondary fluid circulation facilities as a function of the temperature of the dielectric fluid in the tank." 11:44:41 11:45:06 11:45:12 11:45:18 11:45:21 11:45:24 11:45:26 11:45:29 11:45:33

Do you see that? 11:45:34

A I see that. 11:45:35

Q Do these pages mention the Prime Controls system or any of the particular components of the Prime Controls system? 11:45:36 11:45:44 11:45:47

Let's start -- I asked two questions. 11:45:51

Do these pages mention the Prime Controls 11:45:54

system, 14 to 15? 11:45:56

A I think that's just to -- as a matter of fact, they are not really stating Prime Control unless I have missed it in my quick perusal of this document. 11:46:02 11:46:04 11:46:07 11:46:13

Q And do they mention the Kelvion coolers, pages 14 to 15, the limitation, do they mention the Kelvion coolers? 11:46:13 11:46:18 11:46:22

A I mean I do not see that mentioned here specifically. 11:46:25 11:46:27

Q Do they mention the Guntner coolers, pages 14 to 15? 11:46:30 11:46:32

A Again, they do not mention that explicitly. 11:46:35

Q Do they mention any particular components of the Prime Controls system on pages 14 to 15? 11:46:38 11:46:49

A I believe the Prime Controls system was installed for measuring various things like temperatures, may even measure pressures in the system, and those things are mentioned in -- on top of page 15. 11:47:10 11:47:15 11:47:18 11:47:23 11:47:30

Q Yeah. You're referring to the reference to microsensors. 11:47:49 11:47:51

Do they mention where -- do they mention any particular microsensors by location? 11:47:56 11:47:58

A No. In this document, it's talking about, 11:48:09

in general, they are monitoring things like temperature, pressure, flow rate. 11:48:12 11:48:14

Q So it mentions the functionality of -- or it mentions the parameters that are being measured, but it doesn't -- it doesn't describe any particular devices that are used to measure those quantities; is that fair? 11:48:21 11:48:31 11:48:34 11:48:38 11:48:43

A I guess devices to measure a particular quantity is sort of obvious to a person of ordinary skill in the art. 11:48:43 11:48:51 11:48:57

If you're measuring temperatures, there are just a few different available options that could be used and same goes for pressure and flow rate. So while it does not explicitly mention the kind of sensor that is being used, you know, there is a finite and limited set of sensors that are available to make these measurements. 11:48:58 11:49:01 11:49:04 11:49:09 11:49:12 11:49:16 11:49:20

Q Well, let me ask it this way. I mean does it explain how the Kelvion cooler in particular meets this limitation? 11:49:22 11:49:25 11:49:32

A I think what we are saying is the Kelvion cooler is making measurements of the fluid, and based on that, it is adapted to coordinate the operation of the primary and secondary fluid circulation facilities as a function of that 11:49:45 11:49:49 11:49:58 11:50:05 11:50:09

temperature. 11:50:11
Q But does this document say the Kelvion 11:50:11
cooler is making measurements of the fluid? 11:50:14
A As we discussed, this document is talking 11:50:17
about the concept broadly and is not talking 11:50:21
specifically about Kelvion cooler. 11:50:28
MR. THOMAS: I want to just add an 11:50:30
objection that there are a series of Bates-labeled 11:50:32
documents referred to inside of page -- the pages 11:50:35
that you're asking about. You're not showing the 11:50:38
witness those documents. 11:50:40
MR. HALPERN: Right. I'm asking him about 11:50:41
the document in front of him. 11:50:43
MR. THOMAS: I know, but the document in 11:50:44
front of him incorporates other documents by 11:50:46
references, as he's already said, and you're not 11:50:48
showing those documents to the witness is the 11:50:52
objection. 11:50:54
MR. HALPERN: Okay. You can make your 11:50:54
objection. I mean I'm just asking him about, yeah, 11:50:55
what he's looking at. Okay. 11:50:58
MR. THOMAS: But your question -- I guess 11:50:59
to put a finer point on the objection, your question 11:51:01
is assuming facts not in evidence. You're assuming 11:51:04
this document doesn't reference Kelvion or Guntner 11:51:06

or some of the other coolers when there are 11:51:10
documents referred to that possibly do do that. 11:51:13
MR. HALPERN: Okay. Well, now you're 11:51:16
coaching the witness. 11:51:18
MR. THOMAS: No, I'm not. I'm making an 11:51:18
objection because you're trying to lead him to 11:51:20
believe that there is -- 11:51:22
MR. HALPERN: I'm asking about what his -- 11:51:22
MR. THOMAS: I -- I won't argue. My 11:51:24
objection stands. It's fine. Go ahead. 11:51:26
BY MR. HALPERN:
Q So I'm asking you about the document you're 11:51:28
looking at. 11:51:31
Does this document, frankly either on pages 11:51:39
13 to 14 or 14 to 15, discuss how the Guntner 11:51:42
coolers meet either of these limitations that are 11:51:52
being discussed on these two pages -- three pages, 11:51:54
13 to 15? 11:51:59
MR. THOMAS: Just for the record, are you 11:52:00
including the Bates reference -- 11:52:03
MR. HALPERN: No, I'm -- I'm not -- I guess 11:52:04
you could say I'm excluding. Again, this is a 11:52:04
speaking objection. You've explained your 11:52:06
objection. I'm asking him about the document he's 11:52:08
looking at. 11:52:11

MR. THOMAS: The document he's looking at 11:52:12
includes other documents that he's not looking at. 11:52:14
MR. HALPERN: Okay. But I'm asking him 11:52:16
about the part that he is looking at, right, we can 11:52:18
separately talk about other documents, but in this 11:52:20
document, I'm asking -- 11:52:23
MR. THOMAS: I'm just going to object that 11:52:23
you've asked the witness about a document that has 11:52:25
information, you need to show him the whole 11:52:28
document, not just a piece of it. 11:52:30
MR. HALPERN: Well, I'm showing him the 11:52:32
whole document. Documents cite things all the time. 11:52:33
I don't agree with the view that if a document cites 11:52:37
something, that, you know, the document is somehow 11:52:39
incomplete if you don't show all of the things that 11:52:42
are cited. 11:52:45
You know, there are things that are cited 11:52:46
there. As you say, the document speaks for itself. 11:52:49
I'm asking about what's here on the page in front of 11:52:52
you. 11:52:54
Q So does the document that you're reviewing 11:52:57
show how the Guntner coolers meet the limitations 11:53:02
discussed on page 13 to 15? 11:53:07
MR. THOMAS: Same objections. 11:53:09
THE WITNESS: Page 13 to 15, again, 11:53:10

notwithstanding the incorporated by reference 11:53:15
things, do not explicitly mention the Guntner, but 11:53:17
they do describe the functionality of that cooler 11:53:22
and the control system in here. 11:53:27
BY MR. HALPERN: 11:53:30
Q Do they describe the functionality of that 11:53:30
particular cooler or do they just describe the 11:53:33
functionality of a dry cooler and a control facility 11:53:35
in general? 11:53:40
A So when we look at a system, there are 11:53:42
hundreds of things about that system, and not all of 11:53:45
them are relevant for the list here, right. 11:53:47
So as it relates to these claim elements, I 11:53:51
believe it describes it sufficiently that they have 11:53:55
a dry cooler, that they are measuring the 11:54:00
temperatures and pressures in various locations to 11:54:03
coordinate the function -- that coordinate the 11:54:06
functioning of the primary and secondary cooling 11:54:09
facility -- circulation facility, I should say. 11:54:13
Q But they don't discuss any of the 11:54:17
particulars of the Kelvion and Guntner dry coolers, 11:54:19
correct? 11:54:22
MR. THOMAS: Same objection. There's 11:54:22
Bates-labeled documents not shown to the witness. 11:54:25
THE WITNESS: Yeah, they -- in the writing 11:54:27

that is there in these paragraphs, they do not explicitly mention the Kelvion or the Guntner dry coolers. 11:54:30 11:54:33 11:54:41

BY MR. HALPERN: 11:54:45

Q Do these pages 13 to 15 mention the direct control of power to the miners? 11:54:45 11:54:49

A I think they do when they say -- I'm going to read from -- sort of not absolute top, but maybe the second line from top using -- 11:54:51 11:55:16 11:55:22

Q Which page are you on? 11:55:24

A Page 15. 11:55:25

Q Page 15. 11:55:26

A "Using machine-learning technology and data points collected by these sensors, through robotic process automation (RPA) triggers a tuning response to the power intake as needed to either remediate or optimize miner performance," and then it also refers to other documents. 11:55:27 11:55:30 11:55:33 11:55:40 11:55:43 11:55:49

So to a person of ordinary skill in the art, when we say that response to power intake as needed to either remediate or optimize miner performances -- performance means that it is modulating the power input. I forget the exact phrase that you used in your question. 11:55:54 11:55:56 11:56:01 11:56:06 11:56:12 11:56:15

Q Do these pages mention the Restful API, 11:56:26

pages 14 and 15 of the infringement contentions? 11:56:29

A Again, notwithstanding the incorporation by reference, as a matter of fact, the Restful API, I do not believe appears on page 13 to 15. 11:56:34 11:56:37 11:56:43

Q Now, turning to pages 15 to 16 of the infringement contentions, do they mention the Temple network layout? 11:56:59 11:57:01 11:57:15

A Again, notwithstanding the Bates-referenced numbers here, I do not believe that they are explicitly stating the Temple network. 11:57:32 11:57:37 11:57:40

Q Do they mention the Prime Controls system, pages 15 to 16? 11:57:47 11:57:51

A Same answer as the previous question. 11:57:53

Q I appreciate the efficiency of that, but I would rather, if you don't mind, that you just answer the question in its own right. 11:58:00 11:58:02 11:58:04

A Okay. 11:58:05

Q So do pages 15 to 16 mention the Prime Control -- Prime Controls system? 11:58:06 11:58:09

A Again, notwithstanding the incorporation of these Bates documents, I do not believe that the language here states control system that you just mentioned. Sorry. 11:58:16 11:58:19 11:58:24 11:58:34

Q Okay. 11:58:35

A I'm sorry. Which -- this was not -- what was the control system? I'm sorry. I don't have -- 11:58:40 11:58:43

Q The Prime Controls system. 11:58:45

A The Prime Control, right. 11:58:46

Q Do pages 15 to 16 of the infringement contentions which relate to claim 5 mention the Prime Controls system? 11:58:47 11:58:50 11:58:53

A Yeah, again, notwithstanding the incorporation by reference, they do not expressly mention the Prime Controls, though they talk about the functionality that is provided by the Prime Controls. 11:58:55 11:58:58 11:59:03 11:59:05 11:59:17

Q Where do they talk about the functionality that is provided by the Prime Controls system? 11:59:17 11:59:19

A So "Through a series of microsensors, machine-learning, and application programming interfaces our proprietary mining software provides real-time data that enable increased miner uptime, hash rate, and scalability." 11:59:21 11:59:28 11:59:29 11:59:33

"In order for it to provide data from the sensors, it has to get that information from the control system." 11:59:38 11:59:41 11:59:47

Q I see. You note in your report that installation of the Prime Controls system was never completed. 11:59:51 11:59:52 11:59:55

Do you recall that? 11:59:55

A I do. 11:59:56

Q So -- and you are aware that it is not a functioning system? 12:00:01 12:00:03

MR. THOMAS: I'm going to object as mischaracterizes the evidence. 12:00:04 12:00:06

THE WITNESS: Sorry. Could you ask your question again? 12:00:12 12:00:12

BY MR. HALPERN: 12:00:13

Q Yeah. Are you aware that the Prime Controls system is not a functioning system? 12:00:13 12:00:14

A I believe it was installed, but not hooked on. So in that sense, it was. 12:00:17 12:00:19

Q Actually you -- go ahead. I'm sorry. 12:00:27

A In that sense, it was -- if your characterization was it was not functioning -- 12:00:31 12:00:37

THE REPORTER: I'm sorry. In that sense?

THE WITNESS: If your characterization is it was not functioning, then that would be true because it was not hooked on, but -- 12:00:42 12:00:46

BY MR. HALPERN: 12:01:07

Q Yeah. So if you look at Exhibit 1, paragraph 93 -- 12:01:07 12:01:09

MR. THOMAS: Exhibit 1, you said, Counsel? 12:01:12

MR. HALPERN: Yeah, paragraph 93 which is your report. 12:01:14 12:01:16

MR. THOMAS: Do you have that? 12:01:36
BY MR. HALPERN: 12:01:36
Q And you say that "It is my understanding 12:01:36
that Prime Controls had substantially completed 12:01:42
installation of the control facility, but Rhodium 12:01:44
had to stop paying Prime Controls, so installation 12:01:47
of the control system was put on hold. It is my 12:01:50
understanding that Rhodium planned to have Prime 12:01:54
Controls complete the installation after it fully 12:01:56
paid Prime Controls." 12:01:59
Do you see that? 12:02:01
A I do. 12:02:01
Q So is it fair to say that in your report 12:02:02
you characterize the Prime Controls system as an 12:02:04
installation that was not completed? 12:02:09
A Yes, as the report says, it was put on hold 12:02:14
because of underpayment to the contractor. 12:02:16
Q Okay. And so now if I can direct you to 12:02:20
Exhibit 2, I believe, where I had you look 12:02:28
previously was on page 11 at the top, do you see 12:02:37
where it says "Prime Controls and Industrial 12:03:03
Builders never completed the work described in 12:03:07
Plaintiff's Supplemental Response to Interrogatory 12:03:09
No. 10, and as a result, the system described in 12:03:12
Plaintiff's Supplemental Response to Interrogatory 12:03:15

No. 10," etcetera, "is not installed, let alone in 12:03:17
operation." 12:03:22
And I asked you if you had any reason to 12:03:26
doubt the factual -- that that was factually 12:03:31
accurate earlier, and you testified that you did not 12:03:35
doubt that it was accurate. 12:03:38
So do you recall that? 12:03:46
A I do. 12:03:46
Q Okay. So if the system is not installed 12:03:48
and not in operation, then returning to the 12:03:52
infringement contentions, is it -- isn't it the case 12:03:56
that the following description does not apply to an 12:04:02
uninstalled system? 12:04:08
MR. THOMAS: Where are you reading from, 12:04:09
Counsel? 12:04:10
MR. HALPERN: Yeah. Now I'm back to the 12:04:10
infringement contentions, which are Exhibit 4, at 12:04:12
page 15. 12:04:15
Q And you testified a few minutes ago, 12:04:17
"Through a series of microsensors, machine-learning, 12:04:21
and application, programming interfaces, our 12:04:23
proprietary mining software provides real-time data 12:04:27
that enable increased miner uptime, hash rate, and 12:04:30
scalability." 12:04:34
So is it fair to say that the sentence I 12:04:35

just read does not describe a system that isn't 12:04:40
operating and isn't installed? 12:04:44
A So while Prime Controls system may not be 12:04:52
fully completed and installed, that's not the 12:04:57
only -- only place that has sensors. Your entire 12:05:01
line of questioning was about Prime Controls. 12:05:06
Q Yes. 12:05:08
A It is true that Prime Controls is not 12:05:09
providing that microsensor input data in this 12:05:11
control program. 12:05:16
Q Okay. So this description on page 15, 16 12:05:17
of the infringement contentions does not 12:05:22
characterize Prime Controls in your view -- doesn't 12:05:24
apply to Prime Controls; is that fair? 12:05:27
A That depends on how you construe the phrase 12:05:32
"adapted to." You know, it's -- 12:05:36
Q I will get to that, but I -- 12:05:42
A Okay. 12:05:45
Q This -- the language I asked you about 12:05:45
doesn't contain the words "adapted to." So I'm 12:05:47
asking if that language applies -- 12:05:50
A For claim element 5, claim 5, you're 12:05:51
asking? 12:05:54
Q Yes, but I was asking about the language on 12:05:54
the right -- or you know what, I'm sorry. 12:05:58

So you're saying -- is it fair to say you 12:06:00
would agree that this does not describe what Prime 12:06:03
Controls is doing, but that in light of the "adapted 12:06:06
to" language, you would say that it may be adapted 12:06:12
to do those things? 12:06:15
A Yes, I believe that adapted to means that 12:06:20
it is provisioned for, and it was -- from the design 12:06:22
point of view was provisioned for it. It's merely 12:06:25
because of an economic dispute that they have not 12:06:28
turned it on right now. So while the system was 12:06:31
there, they have not turned it on for maybe economic 12:06:37
reason, maybe some other motive. 12:06:43
Q But do you agree that there's a difference 12:06:45
between something that is installed but not turned 12:06:48
on and something that is not completely installed? 12:06:51
A So when we say "it's not completely 12:07:01
installed," it still means that there are certain 12:07:03
portions that are -- that are installed. There are 12:07:04
various elements to a control system, like sensor 12:07:07
system, like temperatures, pressures, and so many 12:07:14
things. Just because it is not completed doesn't 12:07:16
mean certain things are not completed. 12:07:20
Q Did you see -- did you observe when you 12:07:22
visited the site that the sensors of the Prime 12:07:26
Controls system were not connected? 12:07:28

A While I cannot claim that I saw every 12:07:30
single sensor that they would have, I did see some 12:07:38
sensors that were not connected. I believe that 12:07:41
there is some pictures that we might have taken of 12:07:45
that and might have made it into my report, if I 12:07:50
recall correctly. 12:07:52
Q Okay. Did you see anything that were 12:07:53
connected on the Prime Controls system? 12:07:55
A Like, temperature sensor was installed in 12:08:01
the temperature mode. Merely the act of connecting 12:08:04
two different connectors was not completed. 12:08:08
So I can say temperature sensor was 12:08:11
installed and it was, like, I would say, again, I'm 12:08:16
going to guess like in 90 percent of the job was 12:08:20
done or 99 percent of the job was done, just the 12:08:25
connector had to be hooked up which was not done. 12:08:27
So that's the kind of extent to which 12:08:30
things were not completed at least for temperature 12:08:33
sensor, I would say. 12:08:37
Q Is it fair to say, though, that if you turn 12:08:39
on a system where the temperature sensors are not 12:08:42
connected, that the system cannot sense temperature? 12:08:46
MR. THOMAS: Well, I'm going to object; 12:08:51
vague by what you refer to as "system." 12:08:52
THE WITNESS: So I would say it is 12:08:58

there to monitor that temperature. 12:10:32
So the physical part of putting the 12:10:35
thermocouple in the fluid stream was completed, and 12:10:40
that's most of the work. 12:10:43
Q And you concluded that that work was 12:10:50
completed based on your visual inspection? 12:10:53
A Yes, based on the visual inspection where 12:10:56
we could see what I would think is a thermocouple 12:10:58
going inside or a thermistor going inside a fluid 12:11:02
line. 12:11:07
Q But all you could see was the thermocouple 12:11:08
or thermistor sitting on the pipe, correct? 12:11:12
A That's right. 12:11:14
Q You weren't able to actually see that it 12:11:18
was in the fluid stream, for example? 12:11:25
A Yeah. I mean I did not open their 12:11:31
functioning system to see where that thing was 12:11:34
exposed, but if something is going through the pipe, 12:11:38
I think it's a reasonable assumption that it was 12:11:39
measuring the fluid stream. 12:11:42
Q Okay. Except it wasn't measuring it 12:11:44
because it wasn't connected? 12:11:47
A Yes, it's capable of measuring it, yeah. 12:11:48
Q You testified a few minutes ago that it's 12:11:50
provisioned for, but not capable of because it's not 12:11:53

provisioned for measuring temperature, but it is not 12:09:02
measuring temperature. 12:09:06
BY MR. HALPERN: 12:09:07
Q And it is not -- until the installation is 12:09:07
completed by, among other things, connecting the 12:09:09
sensors, it is not capable of sensing temperature, 12:09:11
correct? 12:09:16
A Yeah, it's provisioned for, but it is not 12:09:16
capable of right now. 12:09:18
Q Okay. When you say that it was 90 to 12:09:19
95 percent installed, how did you determine that? 12:09:25
A To install thermocouple or thermistor in a 12:09:32
fluid line, you need to put some special piece of 12:09:38
hardware there through which the sensor can go 12:09:45
through it without having any fluid leaks. You 12:09:51
know, so that's a complex process that needs to be 12:09:54
completed, which I believe was completed there. 12:09:57
I believe providing of -- taking that 12:10:02
signal from the thermistor to the controller was 12:10:05
completed, though I sitting here do not recall with 12:10:10
a hundred percent certainly, but I believe it was 12:10:18
done.
And now all you need to do is connect the 12:10:20
connectors together, and it will go live as long as 12:10:22
your software and rest of the computer system is 12:10:28

connected? 12:11:56
MR. THOMAS: I'm going to object. It 12:11:56
mischaracterizes his prior testimony. 12:11:57
MR. HALPERN: That is -- I'll read it back. 12:12:00
Q Yeah, so I'm reading your testimony. 12:12:13
"Until the installation is completed by, among other 12:12:17
things, connecting the sensors, it is not capable of 12:12:19
sensing temperature, correct?" 12:12:22
And your answer was, "Yeah, it's 12:12:24
provisioned for, but it is not capable of right 12:12:25
now." 12:12:29
Are you changing that answer? 12:12:29
A For it to be measuring the temperature, you 12:12:30
need to connect it. So it's provisioned for. It's 12:12:37
capable if you connect the sensor connectors 12:12:42
together. 12:12:45
Q But in its present state, it is not capable 12:12:47
of sensing temperature, correct? 12:12:50
A In the present state, it cannot measure 12:12:52
temperature. 12:12:55
Q Okay. And pages -- returning to pages 15 12:12:55
to 16 of the infringement contentions, do they 12:13:49
mention the software -- specifically any software 12:13:59
used in connection with the Kelvion coolers or the 12:14:04
Guntner coolers? 12:14:08

A It only mentions their software as a generic term or a platform includes -- 12:14:22 12:14:29

THE REPORTER: I'm sorry?

THE WITNESS: As generic terms -- in generic terms, "Our platform includes our flagship liquid-cooling system and efficiency optimization software." 12:14:31 12:14:32 12:14:35 12:14:39

BY MR. HALPERN: 12:14:40

Q And do pages 15 to 16 mention Restful API or the software used with Restful API? 12:14:40 12:14:43

A Again, notwithstanding the incorporation of Bates documents by reference, just the language of this paragraph does not mention Restful API. 12:14:46 12:14:50 12:14:55

Q Okay. Did you make an effort to ensure that all of the infringement theories you presented in your report were identified in Midas's infringement contentions? 12:14:59 12:15:11 12:15:14 12:15:18

A So first of all, my report is, you know, dated, I believe, after the contention -- infringement contentions -- 12:15:29 12:15:37 12:15:43

Q Correct. 12:15:45

A -- and also my responsibility is for my report. This is more of an attorney responsibility. This I'm referring to is the infringement contentions, but I did discuss some of these 12:15:46 12:15:51 12:15:55 12:15:57

infringement duties with the counsel and made sure that I had my input as these -- you know, in terms of my agreement to the contention -- infringement contentions. 12:16:06 12:16:11 12:16:17 12:16:24

But, you know, my report goes more in depth and lays out with more detail about why I think there is infringement. 12:16:27 12:16:30 12:16:33

Q So when you say you discussed some of these infringement theories with counsel, in other words, are you saying you had discussions with counsel before preparing your report, but did you -- I'm asking if you took this document, the infringement contentions document, and tried to make sure that what was in your report was -- that all of the theories were in some form, even if in less detail, in the infringement contentions document? 12:16:44 12:16:46 12:16:49 12:16:51 12:16:56 12:17:00 12:17:03 12:17:06 12:17:10

A I believe we tried to keep things consistent between the infringement contentions and my expert report on infringement. 12:17:21 12:17:23 12:17:32

Q I think you're -- I appreciate the answer. I think you're answering at sort of a high level to try to be consistent, but I'm asking, did you look at this document and attempt to make sure that the theories in here -- that the theories in your report were in here in some form? 12:17:34 12:17:35 12:17:39 12:17:41 12:17:46 12:17:49

A Yeah, I believe the keyword there is in some form, right. You know, I have, like I mentioned earlier, tried to keep things consistent between the infringement contentions and my expert report on infringement. 12:17:53 12:17:55 12:18:01 12:18:04 12:18:10

Q Did you review the infringement contentions in order to do that? 12:18:11 12:18:14

A I have reviewed the infringement contentions. Did I, you know, spend like hours discussing every line with the counsel like we are doing right now on certain things, no, but tried to make sure that things are consistent. 12:18:15 12:18:18 12:18:24 12:18:27 12:18:32

Q Okay. So another item that I don't see mentioned on your list of materials reviewed in Exhibit 1 -- I really ought to put a bookmark for Exhibit 3 -- is Dr. Ortega's expert report on invalidity, so okay. 12:18:37 12:18:42 12:18:46 12:18:59 12:19:16

You can reference Exhibit 3 or if you know the answer to this question without looking at it, you can tell me. 12:19:22 12:19:24 12:19:26

Did you review Dr. Ortega's expert report on invalidity? I know you testified earlier that you reviewed Dr. Ortega's expert report on -- in rebuttal to your report, and I'm asking about a different report that he prepared. Did you review 12:19:27 12:19:31 12:19:33 12:19:37 12:19:41

his expert report on invalidity? 12:19:44

MR. THOMAS: Vague as to time. What time? 12:19:46

MR. HALPERN: At any point. 12:19:47

THE WITNESS: I -- I saw that report, but I have not reviewed it in detail, and, in fact, I saw it after submitting my expert report on infringement. 12:19:55 12:19:57 12:20:02 12:20:11

BY MR. HALPERN: 12:20:13

Q Okay. So it did not -- it did not have any impact on any of your opinions in this expert report on infringement because you had not reviewed it at that point? 12:20:13 12:20:16 12:20:20 12:20:22

A Yeah, I did not review Ortega's report. 12:20:23

Q Okay. And did you review Dr. Lee's rebuttal expert report on invalidity? 12:20:31 12:20:37

MR. THOMAS: Same objection; vague as to time. 12:20:40 12:20:43

MR. HALPERN: At any point. 12:20:43

THE WITNESS: Okay. I have spoken to Dr. Lee, and I have had a copy of his report, but that's not something that I have gone into details in, and also that was probably, I don't remember this exactly, after my report. 12:20:44 12:20:47 12:20:51 12:20:54 12:21:00

BY MR. HALPERN: 12:21:08

Q Do you offer in your report any opinions on 12:21:08

the invalidity or the validity of the '457 patent? 12:21:11
A No, I do not. I'm merely focused on 12:21:17
infringement. 12:21:20
Q And did you attempt to -- did you have 12:21:21
either a conversation with Dr. Lee or in some other 12:21:25
way attempt to ensure that your opinions on 12:21:30
infringement were consistent with his opinions on 12:21:34
validity of the '457 patent? 12:21:37
A We did have some discussions. I didn't 12:21:39
speak to Dr. Lee, but, you know, I couldn't talk 12:21:46
about all the specifics of that conversation we had. 12:21:52
Q I understand. Yeah, I don't want you to 12:21:57
share privileged communications, but I'm just asking 12:21:59
if you tried to make sure in preparing your report 12:22:01
that your opinions on infringement were consistent 12:22:05
with his opinions on validity. 12:22:08
MR. THOMAS: Objection. It's vague and 12:22:11
ambiguous. I'll just leave it at that. 12:22:17
THE WITNESS: We did not go through a 12:22:19
detailed analysis on -- on that subject on keeping 12:22:23
the consistency between the invalidity and 12:22:29
infringement. 12:22:35
BY MR. HALPERN: 12:22:37
Q Did you have a general discussion about the 12:22:37
consistency of the infringement and validity 12:22:41

many patents. 12:24:02
So when I say the advantages of the 12:24:03
invention over the prior art, you understand what I 12:24:05
mean by that? 12:24:08
A I do. 12:24:08
Q Okay. What's your understanding of that 12:24:10
concept, the advantages of the invention over the 12:24:13
prior art? 12:24:15
A Sorry. So are you asking me if I included 12:24:16
that in my report or are you asking me what are 12:24:19
they? What is it? 12:24:22
Q I'm just asking if you included it in your 12:24:23
report. 12:24:26
A Yeah. Like I said, the document speaks for 12:24:26
itself. There is no section for that where I have 12:24:28
discussed the advantages of the invention as such. 12:24:31
Q Okay. And I -- I am not -- again, I'm not 12:24:37
trying to be cute. I'm sure these two will agree 12:24:40
I'm not cute in any way. 12:24:43
In other words, I searched for it. I 12:24:45
didn't see anything on that subject. You know, I've 12:24:47
read the report, and I just am trying to be thorough 12:24:50
and make sure I didn't miss something. 12:24:54
And your understanding is you did not 12:24:55
address that issue of the advantages of the 12:24:57

arguments that you were presenting or opinions, I 12:22:44
should say? 12:22:47
A We did not have a significant discussion on 12:22:47
this topic. 12:22:53
Q Okay. Another thing I do not see in your 12:22:54
report -- by the way, I'm getting close to a natural 12:23:03
stopping point, if we want to stop for lunch. 12:23:05
MR. THOMAS: Our lunch is here so -- 12:23:08
MR. HALPERN: Yeah, okay. 12:23:10
Q So another thing I did not see in your 12:23:10
report is any discussion of the advantages of the 12:23:13
patented technology over the prior art or other 12:23:17
immersion cooling systems. 12:23:24
Well, let's still -- sorry. 12:23:26
I did not see in your report any discussion 12:23:28
of the advantages of the patented technology over 12:23:29
the prior art, is that correct, that you did not 12:23:31
offer any opinions about the advantages of the '457 12:23:34
patent over the prior art? 12:23:37
A So I believe there my document speaks for 12:23:39
itself. You know, there is no section on that. I 12:23:42
was focused primarily on infringement and 12:23:46
alternatives that, I believe, are also infringing. 12:23:54
Q Okay. I'm asking about a different thing, 12:23:57
though, which is the advantage -- I mean you have 12:24:00

patent -- patented invention over the prior art? 12:24:59
A I did not. 12:25:02
Q Okay. And I, again, just, you know, 12:25:03
lawyers, we have to be -- try to be thorough. So 12:25:06
because you are someone who has a lot of patents, 12:25:10
you are -- you know, you have a lot of experience in 12:25:13
patent litigation. You're obviously a sophisticated 12:25:16
expert on the subject. 12:25:20
I just want to make sure we're talking 12:25:20
about the same thing. So when I say advantages of 12:25:23
the patent invention over the prior art, what's -- 12:25:25
what's your understanding of what that means? 12:25:28
A Advantages over the prior art? 12:25:29
Q Yeah, just that -- I don't mean four or 12:25:36
five sentences. I mean in general the idea of 12:25:40
advantages of the invention over the prior art, what 12:25:42
is that? 12:25:45
A Between, you know, what was some of the 12:25:45
unsolved problems or the improvements that the 12:25:48
practitioners in the field were looking for were not 12:25:53
being achieved by the existing products or existing 12:25:58
art. You know, the description of that is what I 12:26:05
would say is the advantages of the patented 12:26:09
technology over preexisting. 12:26:13
Q Okay. Another subject that I don't see 12:26:14

anything addressing it in your report, and I just 12:26:18
want to confirm that you have not offered any 12:26:22
opinions on it is any opinions about whether Midas's 12:26:25
own products practice the patent -- the '457 patent. 12:26:29
A Yes, I have not provided any opinions in my 12:26:33
report on that. 12:26:38
Q And I also see that you did not offer any 12:26:39
opinions about infringement of the '446 patent which 12:26:45
was asserted earlier in this case and then 12:26:49
withdrawn. 12:26:51
Is that correct that you have offered no 12:26:52
opinions about infringement of the '446 patent? 12:26:54
A That's correct. 12:26:57
MR. HALPERN: Okay. Okay. I'm ready to 12:26:58
break for lunch. 12:27:01
THE VIDEOGRAPHER: Going off the record, 12:27:02
the time is approximately 12:27 p.m. 12:27:03
(Luncheon recess taken.) 01:19:14
THE VIDEOGRAPHER: Going back on the 01:28:22
record, the time is 1:28 p.m. 01:28:28
BY MR. HALPERN: 01:28:30
Q Dr. Pokharna, as a person experienced with 01:28:30
electronic systems and their thermal management, you 01:28:51
must be familiar with standard data center racks. 01:28:57
Is that -- is that so? 01:28:59

A I have some familiarity with data center 01:29:00
racks. 01:29:09
Q Okay. The racks that hold the servers? 01:29:10
A Yeah. Like I said, I have some familiarity 01:29:13
with data center racks. 01:29:18
Q Okay. So in those racks, how are the 01:29:19
servers mounted in the rack in general? 01:29:22
A So there are different kinds of rack 01:29:24
systems, right, and then there are different 01:29:31
standards that exist for servers. There are like, 01:29:33
you know, 1U, 2U, 4U. These refer to specific 01:29:37
height of the server and depending on the components 01:29:44
and especially limited by the cooling systems, 01:29:49
right, you may have 4U rack if you have really 01:29:52
high-power process server that you need to cool. 01:29:58
So, yeah, like I said, there are a lot of 01:30:02
different kinds of racks. They're also limited by 01:30:06
total power that goes in there, and the physical 01:30:09
dimension of those racks. 01:30:13
Q That is very informative and I appreciate 01:30:14
that answer, but I want to ask a slightly -- or I 01:30:16
was asking a slightly different question which is 01:30:20
when I say how are the servers mounted in the rack, 01:30:22
like, literally how are they mounted? 01:30:26
A They may have some guide rails within which 01:30:29

1U, 2U servers are mounted. 01:30:37
Q Okay. How -- and then how is the -- okay. 01:30:39
Yeah, so the servers are typically attached 01:30:51
to the guide rails? 01:30:53
A I don't know. 01:30:55
Q Okay. I mean my understanding -- and tell 01:30:56
me if you agree with this, disagree, or just are not 01:31:05
sure -- is that you typically have rails. There's 01:31:09
like a rail guide that's mounted on the rack -- on 01:31:13
server rack, right. So there's a rail guide and 01:31:17
then you put rails across that slide into the rail 01:31:20
guide and then the servers are mounted on the rails. 01:31:28
A I don't know if every rack is that way. 01:31:33
You know, you don't need all of those, you know, 01:31:37
complicated contraptions that you are talking about. 01:31:41
While they would work with that, I think they are 01:31:46
unnecessary. A lot of times you may just have racks 01:31:48
where you just have the overall dimensions where you 01:31:51
slide in the 1U or 2U server. 01:31:57
Q What do you slide -- and I'm not -- I know 01:32:02
you said it doesn't have to be that way, and I 01:32:10
understand. I'm just asking, you know, kind of 01:32:13
typically. 01:32:15
So when you have a rack where you, as you 01:32:16
said, slide in the 1U server, can you describe what 01:32:19

that would typically be like? 01:32:23
A Yeah. I think, first of all, I'm not 01:32:24
familiar with the mechanical designs. That's not 01:32:28
something that I have worked on or opined on in 01:32:30
this. Mostly concerned with removal of heat from 01:32:34
the processer and other components on the server. 01:32:39
The exact mechanical design of the server system is 01:32:43
something is that I'm not familiar with. 01:32:49
Q Okay. Well, is it common to stack the 01:32:50
servers one on top of the other? 01:32:56
A I don't know. Could you define stack? 01:33:01
What does stack mean? Like -- 01:33:03
Q In other words, you have server line on the 01:33:09
bottom, say, or at the bottom, and then you have one 01:33:12
on top of it and one on top of that and one on top 01:33:14
of that. 01:33:17
A I mean if you look at a rack of servers, 01:33:19
that's how they appear that they are right on top of 01:33:24
each other. There may be some intervening 01:33:27
structures, but I just don't know enough to -- you 01:33:31
know, to give you testimony about it. 01:33:34
Q Okay. I see. In the -- where they're 01:33:35
piled on top of each other, though, or stacked on 01:33:43
top of each other, are there rails in that kind of 01:33:46
installation? 01:33:49

A Like I mentioned before, they may have, may not have. I just simply don't know enough details about it to answer that explicitly.

Q Okay. And do you know when the servers are on rails, if they are typically bolted to the rail?

A Again, I just don't know enough about it. If I were to take a guess, I would think they should be, but I just don't know.

Q Okay. Now, you did refer to a volume unit that you called U, right?

A Yes.

Q And servers can be 1U or 2U or 4U in height, correct?

A That's right.

Q Okay. And the -- so the U refers to the -- does it refer to the height of the server or the height of the slot that the server goes in?

A So they certainly sell 1U servers. So there is 1U server which is nothing to do with slot. If you go on the web page of Dell, you can buy a 1U server. So I think the 1U refers to the height of the server.

Q Okay. Now, if you were mounting a server on rails in this example I'm asking you about, would the -- how would you define -- how would you

understand the slot in that case? Is the slot defined by the rails?

MR. THOMAS: Are you asking about data center servers still?

MR. HALPERN: Yeah, just servers in general in like a typical --

MR. THOMAS: I just want to --

MR. HALPERN: -- data center.

MR. THOMAS: -- object. This exceeds the scope of his expert report.

MR. HALPERN: He's an expert.

MR. THOMAS: I'm saying it exceeds the scope of his expert report.

MR. HALPERN: He's an expert. He offered --

MR. THOMAS: I'm not going to argue. It exceeds the scope. He wasn't offered as an expert on data servers.

MR. HALPERN: Okay. He offers expert opinions that very much relate to the subject matter I'm asking. So about -- anyway, please -- please continue.

Q So I was asking you, in a typical data center server where you have rack-mounted server units, what would you understand the slot to be?

A Okay. So, again, not to confuse that with the slots, the way they are used in the existing patent, removing that, the slots -- if at all, there is something called slot there, as you are saying that there is a slot, what would that mean, if there is a slot, what that would mean, that would mean a place where you will insert the server.

Q Okay. And so if the server is mounted on rails, then the slot would be defined by where the rails are?

A Again, in that hypothetical not to do with this patent, if you have a structure that has rails and slots and you placed something in it, it will be placed in the slot.

Q Okay. Right, but okay -- but you didn't tell me what is the slot there.

Is the slot the rails and the space that they -- that they define?

A I think, again, in your hypothetical, the slot would be the volume that is defined by those. You mentioned, I believe, guide rails. A volume that will be defined in between that will be called the slot.

Q Okay. Now, as you alluded to and I alluded to, the '457 patent talks about an appliance slot in

the claims and in the rest of the patent.

Does the patent identify -- does the patent provide an explicit definition of slot or appliance slot?

Okay. You have it. I was going to offer to give you the patent as an exhibit, but you're looking at the one in your report.

A The patent does not provide an explicit definition of the slot, but it describes slot in Figure 10 shown by the dotted lines as the hypothetical volume where an appliance would go in.

Q Do you understand an embodiment in general in the context of patents, if a patent shows an embodiment, does showing an embodiment define a term?

A That may not be the only definition. We need to read the whole specification, and we will need to look at a particular term in the concept of both specifications as well as the claims that mention that phrase.

Q Are you familiar with the term "lexicography," you know, the patentee being his own lexicographer?

A I'm somewhat familiar with that, but you might remind me again, if it's a legal concept.

Q Sure. It's just where the patentee -- 01:40:25
right, the patent gives an explicit definition of a 01:40:28
term. 01:40:31
A Yep. 01:40:32
Q Okay. 01:40:32
A Right. 01:40:33
Q Is there an explicit -- I think you've 01:40:34
already testified there's no explicit definition of 01:40:38
slot in the '457 patent, right? 01:40:40
MR. THOMAS: Objection. The document 01:40:42
speaks for itself and calls for a legal conclusion. 01:40:44
THE WITNESS: I believe I said that it does 01:40:46
not explicitly define, but it shows what the 01:40:55
patentee means by slot, as I referred to Figure 10, 01:40:59
which is where they describe the slots. They're 01:41:06
just shown by these dotted lines, which is showing a 01:41:13
volume where the appliance might be -- might be 01:41:15
placed. 01:41:23
BY MR. HALPERN: 01:41:24
Q Okay. But -- and I appreciate your 01:41:24
testimony, but I want to ask you, so if you look at 01:41:31
your report, this is now Exhibit 1 at paragraph 31, 01:41:40
it says -- you refer to a couple of claim 01:42:02
constructions right above that, weir and plenum, and 01:42:06
then you say, "It is further my understanding that 01:42:08

the remaining claim terms are to be given their 01:42:10
plain and ordinary meaning to a person of ordinary 01:42:13
skill in the art." 01:42:16
Do you see that? 01:42:17
A Yes, I do. 01:42:18
Q Okay. And so -- and then you say, "That is 01:42:18
the meaning that I have applied to all remaining 01:42:25
claim limitations in my analysis." 01:42:27
Do you see that in paragraph 31? 01:42:29
A Yes, sir. 01:42:31
Q Okay. So since you say that in your 01:42:31
report, is it correct that you have an understanding 01:42:37
of what plain and -- plain and ordinary meaning 01:42:39
refers to? 01:42:42
A Yes. 01:42:43
Q Okay. And do you have an understanding 01:42:45
that where the patent -- where you don't have a 01:42:49
claim construction and you don't have an explicit 01:42:52
definition in the patent, that you apply the plain 01:42:55
and ordinary meaning of a term? 01:42:57
A Sorry. What's the question? 01:43:01
Q Do you have an understanding that where you 01:43:03
don't have a claim construction and you don't have 01:43:05
an explicit definition in the patent, then you apply 01:43:08
the plain and ordinary meaning of a term? 01:43:12

A Yes, I understand that. 01:43:14
Q Okay. Now, is it your view that slot has a 01:43:15
specialized meaning in the field of immersion 01:43:31
cooling? 01:43:34
A I don't believe so. 01:43:34
Q Okay. So it has the same meaning that it 01:43:38
has in general in data centers or in computing? 01:43:41
A No. What has -- immersion cooling is not 01:43:44
limited to data centers, right. So I would offer it 01:43:55
broader than that, like, you know, there's no reason 01:44:01
to limit it to data centers so -- 01:44:05
Q So it has -- is it fair to say slot has a 01:44:08
well-understood, general physical meaning? 01:44:11
A Slot has a specific meaning, yeah. 01:44:12
Q Okay. So in this case, you would give slot 01:44:16
its ordinary meaning for a physical system; is that 01:44:26
fair? 01:44:30
A Ordinary meaning also informed by the way 01:44:31
it is depicted in the specifications of this patent 01:44:36
because a word has many different meanings, right. 01:44:41
You know, obviously you do not apply every single 01:44:47
meaning to a word when you are interpreting in the 01:44:50
context of a patent. 01:44:54
And, you know, I have to inform my decision 01:44:55
by looking at the specifications, the claims, the 01:44:58

figures, and also the dictionary definition to 01:45:01
inform my -- my understanding of that phrase in that 01:45:07
claim element. 01:45:11
MR. HALPERN: Okay. Well, since you 01:45:13
mentioned dictionary definitions, why don't we go 01:45:18
there. 01:45:21
Do you have the Collins? 01:45:22
MR. THOMAS: Are you marking another 01:45:30
exhibit, Counsel? 01:45:32
MR. HALPERN: Yes. This will be Exhibit 5, 01:45:33
I believe, is what we're up to. 01:45:34
MR. THOMAS: Yeah. 01:45:37
MR. HALPERN: This is only one page. So I 01:45:38
have been handing them to you, and then I really 01:45:40
should have gone around that way, but you're closer. 01:45:42
Are all of yours already marked -- 01:45:46
THE WITNESS: Yes. 01:45:47
MR. HALPERN: -- with the numbers? 01:45:48
I just want to make sure so that when you 01:45:48
give them to the court reporter, at the end, we have 01:45:51
them correctly numbered. 01:45:59
(The document referred to was marked by the
Reporter as Pokharna Exhibit 5 for identification
and is attached hereto.)
BY MR. HALPERN: 01:46:09

Q Okay. Can you read the definition? 01:46:09
There's a -- this is the -- what I've just given you 01:46:12
is a printout from the Collins Dictionary. 01:46:15
Do you see that? 01:46:20
A Yes, I do. 01:46:20
Q Okay. And it's the Collins Dictionary 01:46:21
definition of slot? 01:46:23
A I see that. 01:46:24
Q Okay. And there's a noun definition and a 01:46:25
verb definition. 01:46:29
Do you see that? 01:46:29
A Yes. 01:46:30
Q Okay. Can you read the noun definition 01:46:30
into the record? 01:46:33
A "A slot is a narrow opening in a machine or 01:46:34
container, for example, a hole that you put coins in 01:46:37
to make a machine work." 01:46:41
MR. HALPERN: Now, I'm going to give you 01:46:44
another one. This will be Exhibit 6, sorry, 01:46:46
American Heritage. 01:47:02
(The document referred to was marked by the
Reporter as Pokharna Exhibit 6 for identification
and is attached hereto.)
BY MR. HALPERN: 01:47:27
Q And do you see that what I've just given 01:47:27

you is the American Heritage Dictionary of the 01:47:30
English language definition of slot? 01:47:34
A Uh-huh. 01:47:37
Q And this has more definitions for the noun 01:47:38
slot than the Collins Dictionary that I previously 01:47:49
gave you. 01:47:51
So can you read the first definition for 01:47:55
the record? 01:47:59
A "A narrow opening; a groove or slit; a slot 01:47:59
for coins in a vending machine, a mail slot." 01:48:03
Q Okay. Now, I haven't asked you a question 01:48:06
yet. I'm just giving you these definitions. I 01:48:12
realize that, but other than the request to read 01:48:14
them, it looks like to me like the other definitions 01:48:17
here, you know, slot is a word that's used in a lot 01:48:22
of different contexts. They don't appear to me to 01:48:24
be relevant, but I invite you to disagree. 01:48:29
If you want to look this over, I mean there 01:48:33
is a computer's definition which says, "An expansion 01:48:35
slot." That seems somewhat relevant to me in 01:48:38
describing a physical slot, even though it's 01:48:48
narrower and more specific in terms of its use, but 01:48:50
would you agree that, you know, in terms of just 01:48:53
defining a physical slot, generally that it is 1 and 01:48:56
4 that are applicable here or do you see it 01:49:01

differently? 01:49:04
MR. THOMAS: Objection; vague and -- 01:49:04
THE WITNESS: I can attempt -- 01:49:08
MR. THOMAS: It's -- 01:49:09
MR. HALPERN: He's an expert. I'm asking 01:49:12
his -- 01:49:14
MR. THOMAS: I -- I understand, but let me 01:49:14
just make my objection. 01:49:15
MR. HALPERN: Okay. 01:49:16
MR. THOMAS: And you can go on with your 01:49:17
questions. There's a series of different 01:49:18
definitions 1 through 6a and b on this particular 01:49:22
page which are different than those on the prior 01:49:27
Exhibit 5 you showed the witness. So I guess the 01:49:30
question -- I just -- your question is, is it -- 01:49:35
MR. HALPERN: This is a speaking objection, 01:49:39
right. You're just expressing -- you're analyzing 01:49:40
my question -- 01:49:42
MR. THOMAS: No, I'm trying to understand 01:49:42
your question. Is this -- you're asking is this 01:49:43
relevant and my question is vague as to relevant to 01:49:45
what. 01:49:48
BY MR. HALPERN:
Q Okay. So I've been asking you about the 01:49:48
definition -- the definition -- the ordinary meaning 01:49:51

of slot in the context of a physical device, and you 01:49:54
testified that it's, you know, broader than even 01:49:57
talking about, let's say, data centers, just a 01:50:00
general concept. 01:50:03
And I'm giving you some definitions to -- 01:50:04
I'm going to ask you about them once I've given you 01:50:08
a couple more, but as we -- as I've given you the 01:50:10
American Heritage one, I'm pausing to ask, seems to 01:50:14
me the first definition, which is similar to the 01:50:18
previous one I gave you, feel free to disagree, is 01:50:20
pertinent. 01:50:24
And I'm asking you if you think any of the 01:50:25
other ones are pertinent to a physical slot -- to 01:50:27
understanding what a physical -- the ordinary 01:50:32
meaning of a physical slot is. 01:50:34
MR. THOMAS: I just want to object to your 01:50:36
term of "physical slot." It's vague and ambiguous. 01:50:37
There's no reference to the word "physical" in any 01:50:39
of these definitions. 01:50:42
MR. HALPERN: Okay. I'm -- well, some of 01:50:44
these have abstractions like, you know, a place in a 01:50:46
sequence. 01:50:49
MR. THOMAS: I know, but you're -- you're 01:50:49
creating a term that's not present in the 01:50:50
definitions that you're handing to the witness. 01:50:52

BY MR. HALPERN:
Q Okay. I'm asking you about the term "slot." 01:50:55 01:50:57
A Yeah. 01:50:58
Q So -- and I'm asking about in the context of a system like the one in the patent, but not specifically necessarily that one, you know, in data centers generally. 01:50:59 01:51:04 01:51:08 01:51:14
And do any of the definitions on this page seem relevant to you in understanding what the ordinary meaning of slot is? 01:51:16 01:51:19 01:51:21
A Look, you've given me definitions that serve your point. If you look at -- maybe while you are at it, you're on your computer, you could pull up the Cambridge Dictionary definition for me. 01:51:25 01:51:32 01:51:34 01:51:38
Q I think I have that one next. 01:51:40
MR. THOMAS: Okay. Why don't you show it to him then. 01:51:41 01:51:43
BY MR. HALPERN:
Q But -- so I'm posing a question. Do these seem relevant to you as definitions of what the ordinary meaning of slot? 01:51:44 01:51:46 01:51:49
A The slot can also mean a gap, like just I parked my car between an empty slot between the Mercedes and the Range Rover. That's a language 01:51:50 01:52:01 01:52:04

that is applicable. 01:52:10
You can -- people use it, right, and there is no narrow slit or a groove that is formed there. 01:52:13 01:52:15
So obviously the use of the phrase "slot" is broader than just like the Collins Dictionary which just defines it only as a narrow slit or something like that. 01:52:20 01:52:27 01:52:30 01:52:34
Q But in your example of parking, you said I parked in a slot between the Range Rover and the Mercedes. 01:52:35 01:52:39 01:52:43
So if neither the Range Rover nor the Mercedes were there and there were no markings, would you say you had parked in a slot? 01:52:45 01:52:49 01:52:53
MR. THOMAS: Objection; vague as to "markings." What do you mean by "markings"? 01:52:57 01:52:58
BY MR. HALPERN: 01:53:00
Q Okay. I'll leave out the markings. You gave an example that you would say you parked in a slot between a Mercedes and a Range Rover. 01:53:00 01:53:02 01:53:06
So assume there's no Mercedes and no Range Rover and you just parked somewhere. Would you call that a slot? 01:53:08 01:53:11 01:53:13
A If it is out in an open field, probably that would not be a slot, but, again, as it relates to things, the way the slot is being used here, 01:53:23 01:53:28 01:53:34

there are a lot of other things that we need to look at in the specifications to understand what that slot is, and I will leave it at that. 01:53:38 01:53:41 01:53:44
MR. HALPERN: I promise you, I will come back to the specification, but I'm trying to ask you about the ordinary meaning of slot. So this is going to be Exhibit 7. 01:53:47 01:53:49 01:53:51 01:53:58
(The document referred to was marked by the Reporter as Pokharna Exhibit 7 for identification and is attached hereto.)
BY MR. HALPERN: 01:54:15
Q And do you see that I've given you the Cambridge Dictionary definition of slot? 01:54:15 01:54:19
A I see that. 01:54:21
Q Okay. Can you read the -- there's actually two noun definitions. 01:54:22 01:54:32
Can you read them both into the record? 01:54:33
A "Long, narrow hole, especially one for putting coins into or for fitting a separate piece into," and the second definition is "a small, narrow opening for something to be put in." 01:54:37 01:54:40 01:54:44 01:54:47
Q Could you -- I would just note that that one has IT above it, that that is the definition in the context, I believe, of information technology. 01:54:48 01:54:52 01:54:57
Do you agree that that's what that means? 01:54:59

A Yes. 01:55:01
Q And can you read the examples of the IT definition of slot? 01:55:01 01:55:05
A "The memory card slot in your computer, into a slot, you can insert a smart card into a slot on the keyboard to verify digital signatures." 01:55:06 01:55:11 01:55:16
Q Okay. Now, you mentioned the Cambridge Dictionary. 01:55:18 01:55:28
Is that because you regard the Cambridge Dictionary as authoritative? 01:55:29 01:55:31
A This is -- I think the Cambridge Dictionary that I looked at, if I recall correctly, and I'm going back in my memory, had more information in it than what you've just provided here. 01:55:34 01:55:36 01:55:38 01:55:42
Q I don't know what you might be referring to. I just downloaded the Cambridge Dictionary definition. 01:55:43 01:55:50 01:55:53
Do you recall what else you saw? 01:55:54
A I think -- okay. I'm going to have to rely on my memory, but it described space for putting some -- something -- or just give me one second. 01:55:55 01:56:01 01:56:11
Like, it talked both about time slots also, like putting -- I believe, right, because slot can be used in terms of timing that is not mentioned in any of these definitions, and also it talked about 01:56:30 01:56:34 01:56:38 01:56:41

like, you know, space where you could place something. 01:56:46 01:56:52

Q I see. Did you cite that definition in your report or -- 01:56:52 01:56:54

A I did not think that was needed because, when I look at my general understanding of the phrase in context with what is described in the patent itself, in specifications, in the figures, I did not think it was necessary because I didn't think it was a -- something that there was going to be a dispute about. 01:56:57 01:57:02 01:57:06 01:57:11 01:57:16 01:57:19 01:57:24

Q Now, you mentioned the use of slot in the context of, for example, a time slot, like a space in a schedule. 01:57:33 01:57:35 01:57:39

Do you think that use of slot is relevant to the ordinary meaning of the term to a person of skill in the art, this field? 01:57:41 01:57:43 01:57:47

A No. I was referring to that definition to say that the definitions that you are providing are not complete, just as an example of that. 01:57:51 01:57:55 01:57:59

Q Okay. I'll just represent to you I have not edited these in any way. I just simply downloaded the definitions. 01:58:03 01:58:05 01:58:07

A Yes, I do not believe you have edited them. 01:58:09

Q Okay. 01:58:12

A I'm not saying that. All I'm saying is that wouldn't you agree that it is common use of the phrase, but none of your definitions talk about slot in the context of time. So all I'm saying is these are probably incomplete definitions. There are more complete definitions that one could look at. 01:58:12 01:58:14 01:58:18 01:58:22 01:58:26 01:58:29

Q Actually if you look back at the American Heritage Dictionary, which is Exhibit 6, definition 3a says, "An assigned place in a sequence or schedule: A new time slot for a TV program." 01:58:30 01:58:33 01:58:39 01:58:41

There's six definitions here. 01:58:45

A Sure. 01:58:47

Q Yeah, so I mean -- but I -- you know, tell me if you disagree. My understanding is -- I'm trying to get at the understanding of a person of ordinary skill in the art of this term. 01:58:48 01:58:52 01:58:56 01:58:58

You said it's broad. It's not limited to data centers, that makes sense to me, but it does seem to refer to a physical slot of some kind, not a time sequence slot, for example, and so I'm trying to get to the ordinary meaning of a physical slot. 01:59:01 01:59:03 01:59:06 01:59:12 01:59:15

MR. THOMAS: Well, I'm going to object to your use of the term "physical slot." It's not used in any of these definitions or exhibits that you -- 01:59:18 01:59:20 01:59:22

MR. HALPERN: Well, I'm asking the question, right. The patent uses slot or applied slot. 01:59:24 01:59:25 01:59:28

Q Does the patent describe a physical system? 01:59:29

A If we were to go by any of these definitions, then you could read out the word "slot" on this patent because there is no narrow grooves or narrow openings or a slit or, you know -- I mean narrow openings based on Collins Dictionary or narrow hole, long, narrow hole, that is present in the patent as it describes this system. 01:59:36 01:59:39 01:59:43 01:59:46 01:59:52 01:59:56 02:00:02

MR. HALPERN: I will -- I promise you, I'm not withholding discussion of the patent in any way. I'm going to get to that, but I'm just trying to first, right, like put before you some evidence -- Oxford -- of the -- not mechanical, yep, that one, okay, all right -- of just what does this word mean, what is its ordinary meaning. 02:00:07 02:00:10 02:00:13 02:00:16 02:00:21 02:00:33 02:00:35

So this will be Exhibit -- I think we're up to 8, right? 02:00:37 02:00:38

THE WITNESS: Yes. I did not mark these Exhibit 5. 02:00:39

MR. HALPERN: Okay. Let's -- let's do that. 02:00:44 02:00:44

THE WITNESS: Okay. So that was 6 and this is 7. 02:00:44 02:00:46

MR. HALPERN: I have -- 5 is Collins. 6 is American Heritage. 7 is Cambridge, and 8 is Oxford. 02:00:46 02:00:54

THE WITNESS: Got it.

MR. HALPERN: And did I not give it to you? 02:01:00

MR. THOMAS: Nope. 02:01:02

MR. HALPERN: Sorry. 02:01:02

(The document referred to was marked by the Reporter as Pokharna Exhibit 8 for identification and is attached hereto.)

BY MR. HALPERN: 02:01:07

Q Okay. And I can read this one. I'll just spare you reading more, and I'll read it into the record and then ask you if I've read it accurately. 02:01:07 02:01:17 02:01:19

So the Oxford definition of the noun slot is, one, "a long, narrow aperture or slit in a machine for something to be inserted," example, "he slid a coin into the slot of the jukebox." 02:01:23 02:01:26 02:01:30 02:01:34

"A groove or channel into which something fits or in which something works, such as one in the head of a screw: A screwdriver fitted into the slot." 02:01:36 02:01:38 02:01:41 02:01:44

Two, "an allotted place in an arrangement or scheme such as a broadcasting schedule: A late-night television slot, landing slots at Heathrow airport." 02:01:45 02:01:48 02:01:52 02:01:58

Would you agree that these definitions are generally consistent of the general meaning of slot? 02:01:58 02:02:01

A Yeah, I mean you're reading -- that's what Oxford Dictionary defines it as. 02:02:08 02:02:10

Q But of the four definitions, would you say the four definitions I've given you from Collins, American Heritage, Cambridge, and Oxford are consistent with each other with minor variations? 02:02:12 02:02:16 02:02:20 02:02:23

A Largely. 02:02:27

Q Okay. Do you have any reason to disagree with those as a definition of slot? 02:02:27 02:02:30

A No, I don't have any reason to disagree with the dictionary definition of slot that you are reading from dictionaries. 02:02:37 02:02:40 02:02:44

Q Okay. And would you understand an appliance slot to be a slot for an appliance? This is the patent -- 02:02:45 02:02:50 02:02:58

A Now you're referring to the patent -- sorry -- okay. 02:02:59 02:03:00

Q Yes, I'm referencing the patent. So let me ask the question again because I did that in a bad order that will make it not look clean. 02:03:01 02:03:05 02:03:08

Would you understand an appliance slot to mean a slot for an appliance? 02:03:12 02:03:15

A I would think of an appliance slot to be 02:03:22

something where you will place an appliance. 02:03:25

Q A slot where you will place an appliance, right? 02:03:27 02:03:34

A I would say a space where you would place an appliance. 02:03:34 02:03:39

Q So what's the basis for your view that a slot is not limited to a slot, but can be a space? 02:03:42 02:03:45

MR. THOMAS: I'm going to object as argumentative and mischaracterizes his testimony. 02:03:49 02:03:52

THE WITNESS: Because when I looked at the figures and the specifications, they show what they define -- what they -- they show as the slot in Figure 10 is a volume and there is no apertures or, you know, all those definitions of slot that you just gave. 02:03:54 02:03:59 02:04:06 02:04:13 02:04:23 02:04:26

BY MR. HALPERN: 02:04:28

Q Okay. So let me direct you to the patent then, and you referenced Figure 10 in the patent. This is Figure 10 of the '457 patent and right below it is Figure 11, right? 02:04:28 02:04:31 02:04:39 02:04:45

A Yes. 02:04:46

Q Okay. And I'm going to review the patent's description -- or actually probably better to have you read it. Figure 11 which is at -- sorry. 02:04:47 02:04:55 02:04:57

Oh, I went down too far. Column 3 of the 02:05:37

patent, and you can see there is a single very long sentence that I want to direct your attention to at column 3, line 39. 02:05:40 02:06:00 02:06:04

A Okay. 02:06:09

Q Okay. "For convenience of reference, we have illustrated in Figure 1 the tank facility 12" -- I'm sorry. You know what, I'm -- I started too early. I can read less. 02:06:10 02:06:12 02:06:14 02:06:18

Okay. So this is starting at column 3, line 43. "In general, the tank facility 12 comprises: A tank 14 adapted to immerse in dielectric fluid, a plurality of electrical appliances 16, for example, contemporary computer servers (see e.g., Figure 11) each in a respective appliance slot 18a distributed vertically along and extending transverse to, a long axis of the tank (see generally Figure 10); an appliance rack facility 20 of convention design adapted to suspend the appliances 16 (see e.g., Figure 11) in respective appliance slots 18 (see Figure 10)." 02:06:20 02:06:23 02:06:28 02:06:34 02:06:34 02:06:38 02:06:44 02:06:47 02:06:50 02:06:55 02:06:59 02:07:05

Did I read that correctly? 02:07:09

A Yes, you did. 02:07:11

Q So the last part of what I read says, "An appliance rack facility 20 of convention design adapted to suspend the appliances 16 (see e.g., 02:07:12 02:07:18 02:07:22

Figure 11) in respective appliance slots 18 (see Figure 10)." 02:07:26 02:07:29

Would you agree that the patent is describing the servers as suspended in the appliance slots 18 as illustrated in Figure 11? 02:07:29 02:07:32 02:07:38

MR. THOMAS: I'm just going to object. The document speaks for itself and calls for a legal conclusion. 02:07:49 02:07:51 02:07:53

THE WITNESS: Yes, it talks about suspending the appliances, line 50. 02:08:02 02:08:03

BY MR. HALPERN: 02:08:06

Q In the respective appliance slots? 02:08:06

A In respective appliance slot. 02:08:14

Q Right, okay. So in this embodiment, which is the same embodiment that you cited, the only embodiment that shows the appliance slots, the servers are suspended in their respective appliance slots, correct? 02:08:19 02:08:21 02:08:25 02:08:29 02:08:32

A Yes, and, again, all of those slots are shown with a dotted line as hypothetical volume where these appliances are placed. 02:08:33 02:08:53 02:09:00

Q Well, I will come to that, but let me just direct you to Figure 11 which is showing the suspended appliances, and I believe the appliances are 16, and feel free to look back at the portion of 02:09:02 02:09:10 02:09:15 02:09:18

the specification we were just looking at, which 02:09:22
says "a plurality of electrical appliances 16," 02:09:27
that's at column 3, line 45. 02:09:31
So if you look at Figure 11, you can see 02:09:33
the servers are labeled 16 there, the black things 02:09:35
hanging down. 02:09:40
Figure 11 is a side view, right? 02:09:40
A Yes. 02:09:42
Q Yeah, okay. And then you've got 18, that's 02:09:43
labeling both Figures 10 and 11? 02:09:48
A I see that. 02:09:54
Q Okay. So in order for the appliances to be 02:09:55
suspended, they have to be hanging suspended, 02:09:57
they're hanging down from something, right? 02:10:01
A In this particular embodiment, they are 02:10:05
hanging from, I believe, number 16. Also, they are 02:10:09
suspended, yes, they just call it they are 02:10:19
suspended. They haven't really named what they are 02:10:24
suspending from. 02:10:27
Q Right. So I'm asking, what do you infer 02:10:28
they are suspended from? 02:10:32
A Some sort of rail. 02:10:33
Q So -- yeah, so they would be sitting on a 02:10:34
ledge or rail, and then the appliances would be -- 02:10:41
would like have a flange that sits on the rail so 02:10:44

that they can hang there? 02:10:48
A That's possible. 02:10:50
Q For what are -- I mean they're suspended 02:10:51
from a physical -- they're in physical slots defined 02:10:59
by rail -- these rails that they're hanging from, 02:11:02
right? 02:11:04
A No. So it says that "integrated 02:11:05
horizontally into one long wall of tank 14, adjacent 02:11:17
to all appliance slots 18 and adapted to 02:11:22
facilitate." Sorry. 02:11:23
Q No, I don't mind you having a read, but it 02:11:24
says they are suspended -- 02:11:31
A Yes, yes. 02:11:33
Q -- right? 02:11:34
A Rack facility is 20. You're calling the 02:11:35
rack facility as the slot, right, that's purely 02:11:38
different than the slots. The slots is what he's 02:11:43
showing by the dotted line, both in the top view and 02:11:47
the side view, as that hypothetical volume where the 02:11:51
appliance is going to be placed inside. 02:11:56
What you are referring as slot is marked as 02:12:04
20, which are the rails, the rack facility 20 02:12:09
different than the slots 18. 02:12:17
Q Do Figures 10 and 11 refer to the same 02:12:18
embodiment? 02:12:21

A Yes. 02:12:24
Q Yeah, okay. You're saying in Figure 10, 02:12:24
Figure 10 is an overhead view and Figure 11 is a 02:12:28
side view, correct? 02:12:32
A That's correct. 02:12:33
Q Okay. So where do you find a hypothetical 02:12:33
volume described in the patent? 02:12:41
A So the darker lines here are showing 02:12:45
something that is physically not present, but is 02:12:47
defined as the appliance slot, because when they 02:12:52
have a physical thing present, they have shown it 02:12:57
with a solid line. 02:13:00
For example, there is a partition 68 where 02:13:02
they say that there is a -- they have placed what 02:13:05
you would call something that would create a slot, 02:13:06
right. 02:13:09
Number 68 on Figure 11 is a physical wall 02:13:09
that they have provided and they have clearly shown 02:13:13
that as a solid thing. But both in the top view and 02:13:16
the side view, they are showing dotted lines in 02:13:20
which they are saying defines a space, a volume 02:13:25
where the appliance would go in. 02:13:29
Q Okay. But you just -- so your premise is 02:13:32
that they must be showing everything in Figure 10, 02:13:34
and if they're not showing, if they're identifying 02:13:41

those dotted lines as slots and they're not showing 02:13:44
anything else, they must mean that the slots require 02:13:46
only the dotted lines, the holes, is that -- 02:13:49
A I didn't say that. 02:13:52
Q Okay. 02:13:53
A I think you are mischaracterizing what I 02:13:54
said. 02:13:57
What I'm saying is that there is -- they 02:13:58
have figures -- many figures in this patent, right. 02:14:04
Nowhere can I see any physical structures that you 02:14:08
are trying to read into all of these specifications 02:14:13
that are going from top to bottom, shown as slots. 02:14:16
Only place where they show something that 02:14:22
you may think of as what you are defining as slots 02:14:24
are Figure 10 and 11, and they are -- they are 02:14:27
describing a hypothetical volume with these darker 02:14:33
lines. 02:14:39
Q Okay. Figure 10 -- and you have agreed 02:14:39
that Figure 10 and Figure 11 are showing the same 02:14:42
embodiment, right? 02:14:44
A They are showing -- 02:14:48
Q That was your testimony. 02:14:49
MR. THOMAS: I would object as 02:14:50
argumentative and mischaracterizing. 02:14:54
Go ahead. You can answer the question. 02:14:55

THE WITNESS: They are showing the same figure, but the Figure 10 is not complete in the sense that when you look at something from the top, you would also be able to see, depending on where you are seeing, maybe this is right at the bottom, right. 02:14:56 02:14:58 02:15:04 02:15:08 02:15:11 02:15:14

They didn't say where they are showing this cross-section view in Figure 10. Maybe it's right at -- all the way to the bottom where none of the other structures would be visible, for example, right, you know. So in that sense, they haven't really fully described it, but they are in general showing the same embodiment. 02:15:14 02:15:16 02:15:19 02:15:22 02:15:25 02:15:29 02:15:33

BY MR. HALPERN: 02:15:35

Q So you just said that there may be stuff they're not showing you in Figure 10 but in Figure 11? 02:15:35 02:15:38 02:15:42

A That's because where you take the cut, right, I mean when you're looking at something that's a three-dimensional structure and two dimensions, by definition, you're not going to see all the things that are presented in the third dimension. 02:15:42 02:15:44 02:15:47 02:15:50 02:15:52 02:15:54

Q Right. So that means that Figure 10 is showing -- could be just showing the bottom, you've 02:15:55 02:16:00

said it's incomplete, and Figure 11 is showing you what's above it on that same embodiment? 02:16:02 02:16:05

A Possible, possible. 02:16:08

Q Because that's a side view, right, in Figure 11, you have the side view, and you're seeing the appliances hanging down suspended from a rack? 02:16:09 02:16:12 02:16:14

A Yes, Figure 11 shows the appliances hanging from the rack. 02:16:20 02:16:23

Q Okay. So -- and if you look at the sentence I had you read -- or I read actually from column 3, it makes clear that Figure 11 and Figure 10 are describing a single embodiment because it says -- this is column 3, line 49 -- "an appliance rack facility 20 of convention design adapted to suspend the appliances 16 (see e.g., Figure 11) in respective appliance slot 18 (see Figure 10)." 02:16:26 02:16:29 02:16:32 02:16:40 02:16:43 02:16:47 02:16:53 02:16:58

So Figure 11 and Figure 10 are describing the same embodiment as indicated there, correct? 02:17:01 02:17:02

MR. THOMAS: I'm going to -- I'm going to object as mischaracterizing the claim and calls for a legal conclusion. 02:17:04 02:17:05 02:17:09

THE WITNESS: Yes, they are describing the same embodiment. 02:17:10 02:17:14

BY MR. HALPERN: 02:17:15

Q Okay. And Figure 10, as you said, is 02:17:15

showing a cut of the bottom, and Figure 11 is showing the appliances hanging down suspended from the rack, correct? 02:17:18 02:17:22 02:17:24

A I mean, again, Figure 10 and 11, both of these are schematic. They are not in any drawings that are showing a cut. 02:17:25 02:17:29 02:17:32

I'm saying it could be showing the cut is what I said. I'm not saying it is showing the cut, right. It is a representation of -- all they are trying to do in Figure 10 is to show the volume that the patent means by the slot. 02:17:34 02:17:36 02:17:39 02:17:43 02:17:48

Q Does it say volume? 02:17:52

A They show dotted lines in Figure 10. They show dotted lines in Figure 11 for something that they are describing as 18A as the slot and in the same cross-section on Figure 11 where they have a physical thing present like 68, that's a wall, 68, they have shown it as a solid thing. 02:17:54 02:18:00 02:18:04 02:18:12 02:18:16 02:18:21

So that makes me believe that when they are showing a dotted line, that means there is no physical structure that is presented there, and, of course, when you look at other figures on this, like namely Figure 5, which is showing a three-dimensional view of the tank, you know, there is no structure that you can see that is extending 02:18:23 02:18:26 02:18:29 02:18:32 02:18:35 02:18:40 02:18:43

vertically down. Even Figure 1, you don't see any structure that is extending vertically down on any of these figures. 02:18:47 02:18:51 02:18:56

Q On which figures? 02:18:57

A Figure 1, Figure -- this is 2, Figure 5. 02:18:58

Q But are any of those figures showing the slots? 02:19:09 02:19:11

A That's exactly the point. Thank you for making my point that there is no physical structures there. 02:19:13 02:19:15 02:19:18

Q Are they showing the slots at all? Are they even talking about the slots in those figures? 02:19:21 02:19:23

A Figure 1 is showing most of the physical structure that is present in that tank. They have removed the wall of the tank, and they are showing what is there inside -- inside there. It shows the rack facility, I believe, right -- 02:19:25 02:19:32 02:19:38 02:19:40 02:19:49

Q Right. 02:19:51

A And it shows -- 02:19:51

Q So the rack that it shows is what the appliances would hang from, right? That's what you testified is they're suspended? 02:19:55 02:19:57 02:20:01

A Right, right, that's what the rack facility 20. 02:20:03 02:20:06

Q Yep. So that's in -- so physical structure 02:20:07

that the appliances hang from is shown there? 02:20:10
A Yeah, and that's different than the slots 02:20:15
because slots are 18, not 20. You're somehow 02:20:18
conflating 18 with 20. 02:20:24
Q Well, in Figure 11, okay, do you see that 02:20:26
the dotted lines that you are saying are the slots 02:20:31
are defining the location of the slots, that those 02:20:35
line up precisely where the appliances are suspended 02:20:43
from the rack? 02:20:48
A I'm sorry. Could you ask the question 02:20:49
again? 02:20:51
Q Yeah. In Figure 11, the dotted lines that 02:20:51
in your view define the slots, they line up -- each 02:20:54
of them -- each pair of them lines up precisely with 02:20:57
where an appliance is physically suspended from the 02:21:02
rail so that the appliance fits right into that 02:21:05
slot, correct? 02:21:08
A That's how -- they're defining the slot to 02:21:09
be the volume where the appliance is going to be 02:21:18
present. So, by definition, the slot is where the 02:21:27
appliance is. 02:21:29
Q Right. I'm simply asking you, as a matter 02:21:30
of fact, in what they show in this embodiment, all 02:21:33
of the volumes that you are identifying as the slots 02:21:36
line up precisely with where the physical guides 02:21:39

has nothing to do with the patent. 02:22:40
Q I know, but I asked you again about the 02:22:41
patent. 02:22:44
MR. THOMAS: Let's not argue, Counsel. 02:22:44
MR. HALPERN: Well, I'm just going to be --
I'm testing him. 02:22:46
THE WITNESS: I mean if you tricked me 02:22:46
somewhere, it's possible. 02:22:48
BY MR. HALPERN:
Q I'm not trying to trick you. I'm -- I 02:22:49
asked you if these are suspended from this rack, 02:22:51
right? 02:22:54
A Yes. 02:22:55
Q If there's -- if there's some sort of 02:22:55
guides that are holding them up, and I believe you 02:22:58
testified that there would be? 02:23:00
A There could be, but there is none mentioned 02:23:03
in the patent, right. So that's an extra limitation 02:23:06
that we are reading into this. 02:23:09
Q I'm not -- we're not talking about the 02:23:11
claims. I'm just asking what the patent describes 02:23:14
here. 02:23:15
A Okay. 02:23:16
Q I mean it says "an appliance rack facility 02:23:17
of convention design adapted to suspend the 02:23:38

cause the appliances to be suspended. 02:21:44
A Could you show me which physical guides 02:21:49
you're talking about here, I mean in the patent? 02:21:52
Q Yeah. There's a rack from which the 02:21:54
appliances are suspended, right? 02:21:56
A Okay. 02:21:57
Q You testified to that? 02:21:58
A I agree with that. 02:22:00
Q Yeah. And each -- each appliance has to 02:22:01
sit on that rack with some sort of guide? 02:22:03
A Where is that guide mentioned? I am having 02:22:06
trouble finding it. 02:22:09
Q Well, I asked you and you testified as a 02:22:10
person of ordinary skill you understand that the 02:22:12
rack would -- that they would sit on some sort of 02:22:14
guides? 02:22:19
A In a server, yes. In a vertically oriented 02:22:19
server that is air-cooled, you were asking about 02:22:23
that. 02:22:24
Q I was asking about it in this context as 02:22:25
well. 02:22:28
A No, no, no, no. We clarified that, right. 02:22:28
I was saying that you're talking about a server rack 02:22:29
that is in an air-cooling facility. All the 02:22:32
questions that you were asking, you were saying this 02:22:38

appliances in respective appliance slots." 02:23:41
A Right. 02:23:45
Q So that tells you that the rack is 02:23:45
conventional, which is what you were talking about, 02:23:47
that a rack would typically have guides, and that 02:23:50
it's designed to suspend them in the respective 02:23:53
appliance slots. 02:23:56
So doesn't that tell you that there's 02:23:56
something about that rack that is ensuring that the 02:23:59
suspended appliances are each in the appliance slot? 02:24:02
A Maybe they could make -- the slots here are 02:24:15
simply defined as volumes where you would place the 02:24:24
appliance. Anything beyond that is a conjecture 02:24:29
where there is -- whether there is some on the -- on 02:24:34
the mounting -- on the appliance rack facility, if 02:24:40
there is a slot on that which is I think what you're 02:24:45
referring to, but the slot is actually forming 02:24:50
inside the tank where the appliances are located. 02:24:52
Q Is there anything in here about a volume? 02:25:01
Does it say that a slot is a volume anywhere in this 02:25:04
patent? 02:25:07
A No, but when I see what they are -- 02:25:10
obviously if there is -- it has to be volume because 02:25:12
otherwise you couldn't place something in it. If it 02:25:17
didn't have any volume in it, you could not place 02:25:19

anything in it. 02:25:21
Q I'm not -- I wouldn't dispute that, but I'm 02:25:22
asking not if it has to have volume, but if it is 02:25:25
itself a volume and nothing more, and you're saying 02:25:29
the patent defines it as a volume. You just 02:25:34
conceded it doesn't say that. 02:25:36
It shows dotted lines, but that you're 02:25:38
willing to read into the patent, but when I say -- 02:25:42
when I read to you that it says an appliance rack 02:25:44
facility adapted of conventional design -- I'm 02:25:47
adding the a-l -- of convention design adapted to 02:25:51
suspend the appliances in respective appliance 02:25:54
slots, right, which is all but an explicit 02:25:57
definition -- or description, excuse me, of 02:25:59
appliance rack facility as facilitating putting the 02:26:02
things that are hanging from it, the appliances, in 02:26:08
each slot. You're saying it's speculative to read 02:26:11
that -- 02:26:13
MR. THOMAS: Objection to -- 02:26:13
BY MR. HALPERN:
Q -- as describing the physical rack defining 02:26:14
where the slots are or -- right, constraining where 02:26:17
the appliances go, but it's not speculative to look 02:26:20
at dotted lines and say, oh, it's defining -- 02:26:23
MR. THOMAS: Objection -- 02:26:26

BY MR. HALPERN:
Q -- as a volume? 02:26:27
MR. THOMAS: -- argumentative, compound. 02:26:27
It misstates the witness's testimony. I mean this 02:26:29
is just giving a speech and arguing with the 02:26:32
witness. 02:26:35
MR. HALPERN: Well, I'm -- the witness is 02:26:35
an expert. The witness is an expert, 02:26:36
extraordinarily qualified -- 02:26:40
MR. THOMAS: It doesn't mean that you -- 02:26:40
THE REPORTER: One at a time.
MR. HALPERN: And I'm describing back to 02:26:40
him what he's saying and asking him. 02:26:42
MR. THOMAS: No, you're arguing -- what 02:26:44
you're doing is arguing with the witness -- 02:26:45
MR. HALPERN: I'm asking him what he
thinks --
MR. THOMAS: You are arguing with the
witness which you are not allowed to do. 02:26:49
MR. HALPERN: You are certainly allowed to 02:26:49
make your objections. I'm asking you if you think 02:26:51
this makes sense. 02:26:52
MR. THOMAS: Why don't we do this. It's -- 02:26:52
we've been going for an hour. Let's take a break. 02:26:54
MR. HALPERN: I just posed a question. 02:26:56

MR. THOMAS: You did, and that was a 02:26:58
ridiculous question. He can't answer that. 02:26:59
MR. HALPERN: I just asked him, does he -- 02:27:01
THE WITNESS: I may have to have you 02:27:01
reread, that's an honest thing because I just don't 02:27:02
remember exactly the question that you have. If you 02:27:06
can reread the question and I'll answer that. 02:27:08
MR. HALPERN: Okay. Sure. 02:27:10
Q So the patent describes an appliance rack 02:27:17
facility -- this is at 3 -- column 3, line 49 -- an 02:27:20
appliance rack facility of convention design adapted 02:27:23
to suspend the appliances 16 shown in Figure 11 in 02:27:28
respective appliance slots 18 (see Figure 10). 02:27:32
And I'm asking if you read that, in light 02:27:35
of the drawing, which shows each appliance hanging 02:27:39
down exactly in the slot as suggesting that the rack 02:27:46
has guides or rails which you've said is 02:27:51
conventional to tell you where to place each 02:27:55
appliance. 02:27:58
MR. THOMAS: Well, I just want to object, 02:27:59
again, to the form of the question. It's 02:28:01
argumentative, and it misstates -- you're making 02:28:03
assumptions that these spaces -- 02:28:06
MR. HALPERN: Okay. Now this is a speaking 02:28:08
objection. 02:28:11

MR. THOMAS: No, no, you've given us -- 02:28:11
MR. HALPERN: I know, but I'm asking the 02:28:12
questions. We're under different rules. I won't -- 02:28:13
MR. THOMAS: I know, but you can't -- 02:28:16
THE REPORTER: One at a time. One at a
time. Jesus.
MR. HALPERN: I can ask him a question like 02:28:17
that. You are not allowed to make a speaking 02:28:19
objection to suggest a critique of my question. 02:28:22
MR. THOMAS: You're making argumentative 02:28:22
statements to the witness. You're asking him -- 02:28:23
MR. HALPERN: No, I just read a section and 02:28:23
asked does it mean this. 02:28:25
MR. THOMAS: I object as misstating the -- 02:28:25
the figures in the patent and the claims in the 02:28:35
patent. It's compound and argumentative. 02:28:36
THE WITNESS: Yeah, I mean also -- okay. 02:28:38
So before I answer that question, I actually want to 02:28:41
say that -- like, I want to read a sentence from 02:28:44
column 9 -- 02:28:47
BY MR. HALPERN: 02:28:48
Q Sure. 02:28:48
A -- line 11 onwards because I have to 02:28:48
interpret the claims in the broadest possible sense, 02:28:59
right. 02:29:02

"By way of example, it will take but little effort to adapt our invention for use with electronic appliances other than contemporary servers; and to adjust the dimensions of the appliance accommodation slots accordingly," right.

So when I read this, along with Figure 10 and 11 as I interpret it, that tells me that I shouldn't be reading the claim to be limited to the embodiment that you have been talking about all this time, right, because it expressly states that, that it could be used for other things, right.

When I read that along with the fact that there is no particular, you know, slot -- physical slot as you are describing that is shown in any of the figures, there are plenty of figures here in this patent, isometric, two dimensional, top view, side view, none of them show a narrow opening or aperture like you are trying to prove.

When I read especially this column 9, line 11 through 15, that tells me that the slot is not limited to just a conventional appliance like it describes on column 3, line 49, 50, etcetera.

Q Okay. But I appreciate that. So you're saying that it -- that language suggests that slot is defined -- can be defined broadly, it's not

specially defined by the patent, correct?

A That means that the slot, the way it is defined in the patent, is describing a volume.

Q Did what you read say anything about a volume?

MR. THOMAS: Let me just object as asked and answered and argumentative.

MR. HALPERN: He just read a new thing no one had discussed before.

THE WITNESS: So just the dimensions of the appliance accommodation slot accordingly, I guess you can say dimensions is for the volume.

BY MR. HALPERN:

Q Couldn't you adjust the dimensions of a slot by moving the rack guides to a different position?

A Rack guide?

Q Yeah, if you had rack guides --

A Okay. So I need to --

Q -- then you can adjust the size of the slot by moving the rack guides, couldn't you?

A You're not adjusting the size, maybe the location if there were rack guides, which I'm not conceding there are a description of that in this patent, but that would be changing not the volume or

the dimensions but the location.

Q So if you could adjust the location of the slot by moving the rack guide, wouldn't it also be true that you can adjust the dimension of the slot by moving the rack guide?

A I mean that's a hypothetical. The patent talks about adjusting the dimensions, and that's all I'm interpreting, right. I'm not going to put some hypotheticals here.

Q But you're saying to the fact that the slots are adjustable tells you that it's a volume, is that what you're -- is that your testimony?

A No, no, I mean it refers to adjust the dimensions of the appliance accommodation slot. The dimensions means X, Y, and Z, right, the length, width, the height, which to me means a volume.

Q Does dimensions -- I mean isn't that another word for size?

MR. THOMAS: Objection; argumentative --

THE WITNESS: Yeah --

MR. THOMAS: -- asked and answered.

THE WITNESS: -- I mean volume is also a descriptor of the size.

BY MR. HALPERN:

Q Okay. I mean -- do you understand the

statement that you could adjust -- I mean let me read the sentence you just testified about.

"By way of example, it will take but a little effort to adapt our" --

THE REPORTER: Slow down. It will take a little?

BY MR. HALPERN:

Q "It will take but little effort to adapt our invention for use with electronic appliances other than contemporary servers; and to adjust the dimensions of the appliance accommodation slots accordingly."

Doesn't that just mean that you could use this invention with servers of different sizes and shapes?

A No, but this specifically states other than contemporary servers, right. So it's saying it could be any electronic appliance.

Q And then it could be -- you could adjust it to fit any appliance, any electronic appliance, right?

MR. THOMAS: Objection; argumentative.

THE WITNESS: Sorry. I didn't understand your use of a pronoun there. "It" meaning what in your question?

BY MR. HALPERN: 02:34:52
Q The invention, that's the -- right -- "it 02:34:52
will take but little effort to adapt our invention 02:34:56
for use with electronic appliances other than 02:34:59
contemporary servers." 02:35:03
So that's saying the invention can be used 02:35:04
with other kinds of appliances other than 02:35:06
contemporary servers, correct? 02:35:09
A Yes. 02:35:11
Q Okay. And then other appliances presumably 02:35:12
would have different dimensions, right? They would 02:35:15
have a different height, weight -- I mean height, 02:35:17
width, and depth? 02:35:20
A Different dimensions, different way of 02:35:21
presumably mounting them or placing them, different 02:35:27
ways of, you know, what kind of design they have or 02:35:32
the size they have. 02:35:39
Q Yeah. So this is saying you could 02:35:42
accommodate all those different types of device 02:35:44
appliances; yes? 02:35:47
A Yes. 02:35:48
Q And you said there's different ways of 02:35:49
mounting them. 02:35:50
So this is not -- this would encompass, 02:35:51
would it not, something with a rack? 02:35:53

A I mean it may or may not. 02:35:56
Q Yeah. I'm asking if it could. It doesn't 02:36:03
exclude a rack, right? 02:36:05
A But I mean when I'm reading the claim, I 02:36:07
should be giving it its broadest possible meaning 02:36:11
and not confining it to something that is, you know, 02:36:14
the preferred embodiment, especially when the patent 02:36:17
itself talks about, while it could be other ways 02:36:21
of -- you know, it could be other than conventional 02:36:24
server that might be there. 02:36:28
Q Okay. So you're saying it's not limited -- 02:36:30
the preferred embodiment appears to include this 02:36:32
rack, it's not limited to the preferred embodiment, 02:36:36
correct? 02:36:39
A Yes. 02:36:39
Q And therefore there's no special definition 02:36:39
of slot here. There's no lexicography, which is a 02:36:43
concept I asked you before, where the patent is 02:36:49
defining slot. 02:36:52
A I mean it's showing it as that volume where 02:36:53
the appliance is placed. In the preferred 02:36:57
embodiment, the appliance is placed on a rack. In 02:37:03
some other embodiments, it may not be placed on that 02:37:07
rack. 02:37:10
Q Okay. Are there any embodiments where -- 02:37:11

in the patent where the appliances are not on a rack 02:37:20
other than -- I know you just read that sentence in 02:37:29
column 10 as this could be applied to many things, 02:37:32
but does it actually show an embodiment that the 02:37:35
appliances are not on a rack anywhere in this 02:37:38
patent? 02:37:39
A That was column 9, but, no, there's only 02:37:39
one preferred embodiment as it relates to the 02:37:48
interior of the tank -- 02:38:01
THE REPORTER: I'm sorry. The what of the
tank?
THE WITNESS: The interior of the tank that 02:38:02
the patent shows. 02:38:03
MR. HALPERN: Okay. Do you want to take a 02:38:23
break? 02:38:25
MR. THOMAS: Yeah. 02:38:25
THE VIDEOGRAPHER: Going off the record, 02:38:26
the time is 2:38 p.m. 02:38:27
(Recess taken.) 02:47:33
THE VIDEOGRAPHER: Going back on the 02:49:19
record, the time is 2:49 p.m. 02:49:21
BY MR. HALPERN: 02:49:24
Q Okay. So, Dr. Pokharna, I'd like to direct 02:49:24
you to your expert report which is Exhibit 1 at 18. 02:49:30
Do you have that in front of you? 02:49:50

A Page 18? 02:49:51
Q Page 18, yes. So it looks like paragraph 02:49:52
55. 02:49:56
A I wasn't -- I had 18, okay. 02:49:56
Q Okay. And in this paragraph 55, you drew 02:50:02
the appliance slots in red and black outline, 02:50:09
right -- I'm sorry -- in red outline in this 02:50:13
drawing -- 02:50:18
A Yes. 02:50:18
Q -- and black outline -- this is kind of the 02:50:18
same questions apply to both. Page 24, which is 02:50:22
paragraph 71, these are both R70. Maybe I didn't 02:50:27
find one where you drew the R30 slots. Both are 02:50:42
R70. 02:50:46
But anyway, do you see that you have in 02:50:46
paragraphs 55 and 71 of your report where you've 02:50:49
drawn in the appliance slots in red and black 02:50:53
respectively? 02:50:57
A Uh-huh. I see that. 02:50:57
Q Okay. Now, those outlines were drawn in -- 02:51:00
that show the slots in your opinion were drawn in by 02:51:04
you, those are not in the actual CAD drawings or in 02:51:10
the tanks, correct? 02:51:13
A That's correct. 02:51:14
Q Do you know why in one of them -- in the 02:51:16

first one, you have the red outline, and it encloses 02:51:21
a circular pattern of holes, and then above it a 02:51:27
square pattern of four -- or diamond pattern of four 02:51:31
holes, and then in the drawing that's in paragraph 02:51:35
55, then in the drawing in paragraph 71, your black 02:51:38
outline of the slot is just the circular set of 02:51:42
holes, but not the diamond pattern? 02:51:46
A I do see that. 02:51:50
Q If you see in paragraph 71, the slots here 02:51:56
are smaller and do not include the set of four holes 02:52:00
in a diamond configuration that's at the top of page 02:52:02
25. 02:52:05
Do you see that? 02:52:06
A I see that. 02:52:06
Q Okay. And do you know why you excluded the 02:52:16
diamonds in one identification of the slot and 02:52:19
included it in the other? 02:52:23
A I believe those four holes is where the -- 02:52:54
dielectric coolant is going through the power supply 02:53:03
of these miners, and we are mainly concerned about 02:53:11
the coolant that is flowing through the section 02:53:21
where the miners are which is described by that big 02:53:25
bunch of different holes. 02:53:31
THE REPORTER: Bunch of different?
THE WITNESS: Bunch of different holes. 02:53:43

That's where the -- most of the flow -- that's where 02:53:43
the focus of the cooling is. 02:53:46
BY MR. HALPERN: 02:53:53
Q But why would that be different from one 02:53:53
drawing of the R70 versus the other? 02:53:56
A I don't think I have the picture here for 02:53:59
R30. I believe for R30, those small diamond holes 02:55:21
are not present and I'm kind of speaking from memory 02:55:27
so I may not be hundred percent correct about that. 02:55:43
So, again, the main focus is where the 02:56:03
those bigger holes where the appliance -- where the 02:56:11
miner holes are, that's really the slot where the 02:56:17
appliance is going, what is described as the full 02:56:23
diamond-shaped holes is for power supply. It could 02:56:29
be -- it could be excluded from the definition of 02:56:35
the appliance itself as such here. 02:56:39
THE REPORTER: I'm sorry. The appliances?
THE WITNESS: The definition of the
appliance here as such.
BY MR. HALPERN: 02:56:47
Q But it is part of the miner, right, the 02:56:47
power supply? 02:56:51
A The power supply is a part of the miner. 02:56:51
Q Okay. So how are you determining -- well, 02:56:57
let me ask you this. 02:56:59

Is one of these a mistake? Do you want to 02:57:00
correct one of them and say it should be drawn the 02:57:02
same way for both? 02:57:06
A I think it should probably be drawn the 02:57:21
same way for both. The appliance slot should 02:57:24
include the power supply for the appliance as well. 02:57:36
Q Okay. So it's the drawing on -- in 55 that 02:57:40
is correct in your view showing where the slot is 02:57:43
and the one in 71 should -- the black outline should 02:57:46
extend a little bit to include that diamond set of 02:57:52
holes there as well? 02:57:55
A I believe so. 02:58:01
Q Okay. So how -- I think you just sort of 02:58:02
well, let me just ask it. 02:58:09
How do you determine -- how did you 02:58:11
determine when you looked at this where the slots 02:58:13
are? Is it based on the shape of the miner? 02:58:15
A It's based on the shape of the holes in the 02:58:19
base plate. The base plate here, the one that has 02:58:28
all of these hole patterns, that is matched with 02:58:38
getting the coolant to each of the -- to a 02:58:41
particular location, and that is really what is 02:58:47
defining the volume within which you can place your 02:58:49
appliance. 02:58:55
Q Okay. But if you were wavering about 02:58:56

whether to include the power supply, I mean is it 02:59:01
fair to say that if you had this same base plate but 02:59:05
you put the miners in without the power supply, then 02:59:08
the slot would be -- then you would draw the slot to 02:59:12
exclude that diamond set of holes? The slot would 02:59:18
only be where the power supply is going to 02:59:22
go -- I mean I'm sorry -- where the miner is going 02:59:24
to go without the power supply? 02:59:26
A I'm sorry. Could you reask the question? 02:59:28
Q Yes. If you were to have miners - the same 02:59:30
miners but without the power supply to go on this 02:59:46
same base plate, would you then draw the slots 02:59:50
differently and not include the diamond set of 02:59:54
holes? 02:59:58
A I think the roles of orifices on the base 02:59:59
plate here would define where the slot is. 03:00:13
Q Okay. Regardless of the shape of the 03:00:22
appliances? 03:00:23
A Typically I believe in all the accused 03:00:26
products, M70 and M30, these holes are matched with 03:00:31
the intake for -- what was meant for air, on M30, 03:00:37
you remove the fans and where the intake manifold, 03:00:43
if you will, for the miner heat sinks is, these 03:00:46
holes are matched with that. 03:00:53
So one set of holes is matched with where 03:00:54

all the boards and the big heat sinks are and another set of small holes, those diamond shape things, are matched with where the power supply is. 03:00:56 03:00:59 03:01:02

Q Okay. So if I bought -- if Rhodium bought miners of a completely different shape that, say, you know, didn't fit into these outlines, right, and, you know, I don't know, say it's one and three-quarters the size -- the width, and you put them on this same base plate, would the slots be the same or would the slots then be different because the miners are a different size? 03:01:05 03:01:10 03:01:15 03:01:19 03:01:23 03:01:26 03:01:31 03:01:35

A I think in that hypothetical, we'll need to define a lot of things and see if -- you know, if there is sufficient flow to each of those miners, right. 03:01:36 03:01:40 03:01:45 03:01:50

What really you're trying to do is to cool all the miners to similar degree, right. That's why there is the provision of the face plate in the M70s which is matched with the location of the holes on the miners itself. If you have a different miner, we'll have to analyze it closely to see if the holes are defining the slots or not. 03:01:51 03:01:53 03:02:00 03:02:05 03:02:10 03:02:13 03:02:18

Q But I'm positing a miner that doesn't fit into these spaces that's, you know, sort of irregular with respect to these spaces, and you put 03:02:23 03:02:26 03:02:28

those in the tank, you know, does the tank have appliance slots adapted to -- or is the tank adapted to immerse these appliances each in a respective slot? 03:02:31 03:02:37 03:02:43 03:02:48

MR. THOMAS: Objection; improper hypothetical. 03:02:49 03:02:51

You can answer the question. 03:02:51

THE WITNESS: Again, it depends if those appliances are such that it still takes the same amount of coolant from each of these hole patterns, then we'll need to analyze that to define the slot. 03:02:53 03:02:58 03:03:05 03:03:12

But if you are talking about a hypothetical where like, you know, there is no holes below the intake for the miner, right, that miner is just sitting onto the base plate where there are no holes, then that's clearly not sitting in the slot as defined in this patent. 03:03:15 03:03:17 03:03:26 03:03:30 03:03:33 03:03:39

BY MR. HALPERN: 03:03:40

Q Okay. What if you -- I mean what if you took the miners that you have, that the Rhodium actually uses, and we moved each of them halfway so that it's sitting exactly the center of what you've drawn here as a slot is at the edge of each one, and each one is in two slots, each one is not in one slot, right? 03:03:40 03:03:48 03:03:53 03:03:56 03:03:59 03:04:04 03:04:09

A Yeah. I think, again, a lot of these hypotheticals, right, I just -- there may be a disconnect between the way I understand it and the way you are describing it. 03:04:17 03:04:20 03:04:24 03:04:28

But if you were to do -- like place them such that your holes on the miner is not aligned or not -- you know, there along with the holes from the base plate where the coolant is coming in, then they will not be in the slot, right. 03:04:29 03:04:34 03:04:38 03:04:43 03:04:48

There has to be a way from -- the coolant from these holes to make their way into the appliance, right. I mean the hole patterns along with the miner when you put it in need to analyze both of them to see what the volume is, the slot is. 03:04:49 03:04:53 03:04:58 03:05:03 03:05:08

Q You need to analyze the hole patterns to see where the slot is, is that what you said? 03:05:18 03:05:21

A Analyze the hole patterns and how the inlet on the miner is. 03:05:23 03:05:27

Q Okay. So I'm asking you, though, that if I took -- you defined where the slots are in your drawing. 03:05:31 03:05:33 03:05:37

If I took the very same miners and I just moved each one halfway over so that it's half in two slots, would -- I just placed them that way, would each miner be in a respective appliance slot or 03:05:37 03:05:40 03:05:44 03:05:50

would each miner be in two slots? 03:05:54

MR. THOMAS: Objection; improper hypothetical. 03:05:56 03:05:58

You can answer the question. 03:05:58

THE WITNESS: So I think that the hypothetical, based on the way I am looking at it, there will not be any coolant going into the power supply. 03:06:05 03:06:16 03:06:21 03:06:25

I think the main boards will still get some coolant from the hole patterns, and, therefore, it might not really function if the power supply needs the cooling guide, but the rest of the holes, there are so numerous that they will still be supplying coolant to the miner and in that case, the volume -- the slot may be formed, you know, sort of halfway to each of these hole patterns. 03:06:25 03:06:27 03:06:33 03:06:39 03:06:43 03:06:47 03:06:54 03:06:59

BY MR. HALPERN: 03:07:00

Q Okay. So it sounds like you're saying the slot is defined by where I put the miner? 03:07:00 03:07:03

MR. THOMAS: Objection; argumentative and misstates his testimony. 03:07:06 03:07:08

THE WITNESS: I wouldn't say that necessarily, right. You know, I think it all depends on, you know, what you're trying to do is -- is you have these hole patterns from where you're 03:07:10 03:07:12 03:07:15 03:07:18

bringing in the coolant and you want this coolant to go in the miner. So the slots are, you know, essentially defined by the hole patterns, but the miners need to line up with the hole patterns. 03:07:23 03:07:26 03:07:32 03:07:36

So in your hypothetical, if the miners can line up with the hole patterns, then that's how the appliance -- the slot volume will be defined. 03:07:39 03:07:41 03:07:45

BY MR. HALPERN: 03:07:48

Q Okay. So in other words, anywhere that you put the miner, if it works, if the -- whatever the hole pattern may be, like if there's enough flow that the invention works or the system works, then the miner is in a slot and the slot is defined by where the miner is? 03:07:48 03:07:51 03:07:55 03:07:58 03:08:01 03:08:07

A Yeah, I think in that hypothetical, I would say that that is the case. 03:08:16 03:08:19

Q Okay. So you probably already answered my next question, but let's say I had just like a completely homogenous pattern of holes. 03:08:21 03:08:28 03:08:32

A Yes. 03:08:35

Q There's no like -- here, the way you've drawn it, you have separate -- there's a shape, the circle, and the diamond and it recurs the same in every -- everything that you've drawn as a slot but, you know, you could imagine just you have a grid of 03:08:36 03:08:39 03:08:44 03:08:47 03:08:52

holes covering the whole plate so that you can't -- there isn't an obvious way to divide them up or you can divide them any way. 03:08:58 03:09:02 03:09:05

So in that case, would you say the same thing you just said, wherever you put the miner, you'd define a slot? 03:09:06 03:09:10 03:09:12

MR. THOMAS: I'm going to object as improper hypothetical. The witness may answer. 03:09:14 03:09:15

THE WITNESS: Yes, I mean in that case, the slot will get formed where you are placing your appliance. 03:09:30 03:09:32 03:09:36

BY MR. HALPERN: 03:09:39

Q Okay. Now, in that case, if you had this completely -- this grid that I just described where you have a grid of holes, that doesn't guide you one way or the other, what about that -- like, what -- what tells you where the slot is? Is there anything that tells you on that even grid where to put the miner? 03:09:39 03:09:49 03:09:53 03:09:55 03:10:14 03:10:16 03:10:21

MR. THOMAS: Objection; improper hypothetical. 03:10:24 03:10:25

THE WITNESS: You're saying if you have a totally -- a grid of holes on the entire base -- 03:10:31 03:10:36

BY MR. HALPERN: 03:10:38

Q Just have an even grid, yeah. 03:10:38

A Yeah. You would place them to maximize the volume of miners if there is sufficient flow through the system, and if you have sufficient flow, then you would, you know, use the width such that -- you know, you're designing these things specifically for a system, and you would design it such that, like, let's say the width is six inches, you want to have it, like roughly speaking, a multiple of those six inches. 03:10:42 03:10:56 03:11:00 03:11:03 03:11:09 03:11:11 03:11:17 03:11:20 03:11:23

So you could place -- you know, maximize the volume in -- in that time to place all of your miners, such that you can get sufficient flow through each of those, and then the -- you have slots that will be defined just at that equal interval, right; in this case, six inches apart, the volume extending upward from the base of the tank. 03:11:23 03:11:25 03:11:29 03:11:32 03:11:36 03:11:41 03:11:48

Q But if you place the miners irregularly, right, let's say you happened to do that, again, I think you've already testified to this, but then however you placed them, even if you placed them irregularly, the slots are going to be defined by the miners in that case, where the miners are? 03:11:48 03:11:51 03:11:55 03:11:58 03:12:00 03:12:03

A Yeah. I mean that hypothetical is like sort of not something that a person of ordinary skill would do. 03:12:08 03:12:11 03:12:14

I mean, you know, from a patent point of view, if you were trying to prove things one way or another, you can place things haphazardly, but that doesn't really maximize the volume, maximize the performance, you know, in -- in any sense. 03:12:15 03:12:17 03:12:20 03:12:24 03:12:26

You want to design things to work well, with minimum cost, maybe dollar cost, energy cost, fluid cost, etcetera, so, you know, the hypothetical have a finite in that case -- you know, it's -- I have not really analyzed that -- that hypothetical that if you have something totally hypothetical, where the slots are from. 03:12:31 03:12:34 03:12:39 03:12:43 03:12:49 03:12:52 03:12:54

But in the case of when you place things regularly in an engineered product, you know, the slots are formed where, you know, the holes are, lined up with the holes for the miners. 03:12:57 03:12:59 03:13:03 03:13:06

Q Okay. But I mean the patent gives the example where it talks about that barrier that you could use if you didn't have enough appliances to fill a whole tank? 03:13:08 03:13:11 03:13:14 03:13:16

A That's right. 03:13:17

Q Okay. So I'm, I think, saying maybe you don't fill the whole tank because, for whatever reason, you don't have enough miners for a particular tank, and you have a regular grid of 03:13:17 03:13:21 03:13:24 03:13:27

holes so you can put them anywhere -- 03:13:29
A Right. 03:13:32
Q -- in that case, would the slots be 03:13:32
whatever the miners are? 03:13:35
MR. THOMAS: Objection; improper 03:13:36
hypothetical. 03:13:38
You can answer. 03:13:38
THE WITNESS: I mean since you mentioned 03:13:39
the patent says that the volume where there is no 03:13:41
appliances present, the pattern still calls those 03:13:46
individual volumes as slots. 03:13:54
BY MR. HALPERN: 03:13:56
Q Yeah, I'm not talking about this patent 03:13:56
now. I was asking about where you have the even 03:13:59
grid of holes so it all looks the same, right, a 03:14:01
homogenous grid? 03:14:04
A Right. 03:14:05
Q You have fewer appliances than needed to 03:14:05
fill the tank, right? 03:14:08
A Right. 03:14:09
Q And so you don't have to tightly place them 03:14:09
all in a row, and you place them a bit 03:14:13
irregularly -- 03:14:15
A Right. 03:14:16
Q -- is each one still an appliance slot? 03:14:17

MR. THOMAS: Objection; improper 03:14:20
hypothetical. 03:14:21
THE WITNESS: Yeah, I would need to study 03:14:22
that a little bit more to really understand and 03:14:23
answer that question. While sitting here, it's hard 03:14:25
for me to really understand the question exactly and 03:14:29
pinpoint where the slots are on that. 03:14:33
BY MR. HALPERN: 03:14:36
Q Okay. Well, I mean you said earlier the 03:14:36
slots would be where the miners are, assuming there 03:14:43
was adequate flow through the miners; is that 03:14:46
correct? 03:14:49
I thought that's what you said. So I'm 03:14:52
just asking if that applies where you have -- you 03:14:54
know, in this hypothetical where you just have an 03:14:58
even grid of holes that all look the same all the 03:15:00
way across and you place the miners whichever way? 03:15:04
MR. THOMAS: I just want to object as 03:15:07
mischaracterizing his testimony. 03:15:08
You can answer. 03:15:10
THE WITNESS: I think I'm not sure where 03:15:26
the slots are. If you are going to place those 03:15:31
miners haphazardly, you know, like reassign those 03:15:35
and, you know, something might be lying on its -- 03:15:39
BY MR. HALPERN: 03:15:42

Q Not lying on its side. Let's say they're 03:15:42
all upright. You have an even grid of holes. 03:15:44
There's holes everywhere across the whole thing, 03:15:46
but, you know, you just don't place them evenly 03:15:49
spaced, let's say. Maybe some were turned a little 03:15:51
bit. Some are -- one is at six inches and then the 03:15:54
next one is at seven inches from that one. 03:15:57
A Right, yeah. 03:15:59
Q But all vertical, all on an even grid of 03:16:00
holes. 03:16:04
A Right. 03:16:06
Q And let's assume, you know, that, as I 03:16:07
think you've said, that if you had kind of holes 03:16:09
everywhere, you're going to have adequate flow? 03:16:11
MR. THOMAS: Again, improper -- objection; 03:16:14
improper hypothetical. 03:16:16
THE WITNESS: Yeah, yeah, I'm not sure if 03:16:21
we have the slots in -- in that kind of hypothetical 03:16:25
because what I have really analyzed are the accused 03:16:34
instrumentalities here, M30 and M70, which have a 03:16:43
hole pattern that corresponds to the inlet of the 03:16:48
miners. 03:16:51
And, you know, as I think the patent also 03:16:52
says is that you have these holes that are lined 03:16:55
with, you know, each appliance for each slot, you 03:16:59

know, I think that is clearly the slot. 03:17:06
BY MR. HALPERN: 03:17:10
Q Uh-huh. So would it be then if you 03:17:10
replaced -- if you got rid of this plate and you had 03:17:15
an even grid of holes, the hypothetical we've been 03:17:20
talking about, you just had a square grid of holes 03:17:24
where they're everywhere on the base plate and you 03:17:27
arrange the tanks irregularly, they're all upright, 03:17:32
but they're not spaced evenly, would that be a 03:17:35
noninfringing substitute because they're not each in 03:17:39
a respective appliance slot? 03:17:42
MR. THOMAS: Objection; improper 03:17:46
hypothetical. 03:17:47
BY MR. HALPERN:
Q Or would that still infringe because you 03:17:47
put them -- 03:17:49
A I need to -- I've not performed that 03:17:49
analysis. I'll need to look at it carefully and 03:17:51
consider all the things. 03:17:54
The truth is I've been looking at -- at 03:17:57
implementations in M30 and M70 where these holes are 03:18:01
all aligned, right, and it's clear that at least in 03:18:06
that case, it is defining these holes. Together the 03:18:09
holes and where the appliance is going is the slot. 03:18:14
Q But in this then, could I avoid 03:18:20

infringement by just moving the miners so they don't fit into the red outlines so that each one is in multiple slots?

MR. THOMAS: Objection; improper hypothetical, exceeds the scope of his expert opinion.

BY MR. HALPERN:

Q Or would that still infringe in your view?

A Yeah, like, again, I've said, I've really not performed that analysis and would need to carefully consider all the things to make the determination.

Q So you're unable to say if moving the miners so that each one is in more than one of these red outlines is no longer each in a respective appliance slot?

MR. THOMAS: Objection; mischaracterizes prior testimony, asked and answered.

THE WITNESS: Yeah, I would need to look at quite a few different things and weigh them against each other.

BY MR. HALPERN:

Q What would you need to look at?

A See if there is sufficient flow going through the miners, is the system working, is the

flow getting all bypassed around the miners so that it's, like, not going to function well.

I need to also, again, look at all the evidence in the patent on the -- on the slot, like, you know, there are other places where the patent mentions lining up the holes with the particular appliance slots, right. So we need to consider all of that to make that determination.

Q I see. Where does the patent mention that?

A I believe column 4, line 24, 5 onwards.

Q Oh, I see, uh-huh.

A "Preferably, each appliance slot 18a is supplied via several rows of orifices, this generally tending to reduce the volume of the dielectric fluid exiting each orifice and to make the flow of dielectric fluid more uniform" --

THE REPORTER: I'm sorry. To -- exiting each orifice to?

THE WITNESS: "To make the flow of dielectric fluid more uniform upwardly through the appliance slots 18."

BY MR. HALPERN:

Q But assuming this slot -- assuming the holes provided adequate flow with your placement of the appliances outside the red lines so that each

appliance was in more than one slot with adequate flow --

A Right.

Q -- would that -- would each appliance still be in a respective slot or would each appliance be in more than one slot?

MR. THOMAS: Objection; argumentative, asked and answered.

THE WITNESS: So I mean, again, these red marks that are drawn here are specific to the configuration that exists today in R70 tanks. I might have been speaking all this time M70. I don't know why, but it's R70.

BY MR. HALPERN:

Q That's fine.

A The -- if you are changing the design --

Q I'm not changing the design. I'm asking you -- sorry to interrupt -- this exact design, but I just move the miner so that each one is in multiple slots as you've drawn them.

A Yeah.

Q Is that, you know, no longer each appliance in a respective appliance slot because they're in more than one slot, assuming adequate flow, or would you say if there's adequate flow, then they're each

still in respective appliance slots because the slot is where the miner is?

MR. THOMAS: I'm going to object as improper hypothetical.

You can answer the question.

THE WITNESS: Again, like I mentioned earlier, I would need to analyze that situation more closely and weigh all the things before I make my judgment of that.

BY MR. HALPERN:

Q What would you need to weigh? You said you needed to weigh the flow, and I said, okay, there's adequate flow, assume that. You've got the pattern of holes. What else would you have to know?

A Yeah, I think I'll, again, need to read in detail all the specifications of the patent and, you know, how it goes about defining the slots and the flow through the slots and the metes and bounds of that because it's a little bit more involved than doing it here under the gun.

Q Okay. Are the holes -- I know that you have defined the slots as a volume, and you say in your report that the slots are -- I'm just using the words of the claim because you use the words of the claim or something close to it, but the slots are

distributed vertically -- I don't want to characterize what you said in your report, but you're familiar with the distributed vertically along the long wall of the tank aspect of the claims? 03:23:23 03:23:27 03:23:30 03:23:32 03:23:35

A Yes, I am familiar with it. 03:23:35

Q So with reference to not the volumes but just the holes themselves at the bottom, are the holes distributed vertically along the long wall of the tank, the holes in the plate or the plate for that matter? 03:23:37 03:23:39 03:23:44 03:23:47 03:23:50

A I don't believe holes are -- or the plate is distributed along the -- vertically along the long wall. Plate is a horizontal plate. 03:23:57 03:24:00 03:24:04

Q Okay. Now, you mentioned wanting -- among the factors that you would consider, wanting to determine if there's adequate flow through the miners, right. 03:24:07 03:24:19 03:24:21 03:24:24

How would you determine whether there's adequate fluid flow through the miners? 03:24:26 03:24:28

A Are you able to cool them to the desired temperature of the various miners that exist within the system or are they at a uniform enough temperature, are your flow rates excessive for the kind of cooling that you are getting. I mean in 03:24:33 03:24:40 03:24:45 03:24:48 03:24:54

some -- is your system kind of close to being optimal and not underdesigned or overdesigned for the job that it is supposed to do. 03:24:58 03:25:05 03:25:11

Q And you said one of the things is -- you'd look at is are the flow rates excessive. 03:25:14 03:25:17

How would you determine whether the flow rates are excessive? 03:25:20 03:25:24

A Again, it will take doing an analysis. You know, there is -- you could estimate things like heat transfer coefficients, the thermal resistances of heat sinks based on the flow rate of the liquid around it, and if that is sufficient to cool the miner, then you would think that is adequate. 03:25:27 03:25:36 03:25:40 03:25:45 03:25:51 03:25:56

You know, when you have -- when the hypothetical that you were describing with the -- where the entire base plate has a bunch of holes and you have a few miners here and there, maybe the coolant would bypass the miner. 03:26:00 03:26:04 03:26:07 03:26:09 03:26:14

It may because the pressure drop through the miner itself is much higher than just the system in which case you are essentially wasting your energy that you are putting in in pumping. 03:26:18 03:26:20 03:26:24 03:26:28

So there are a lot of different things that will go in an engineering analysis to see if the system is designed properly or not. 03:26:31 03:26:33 03:26:36

Q And you mentioned the variable of the thermal resistance of the heat sinks based on the flow rate of the liquid around it. 03:26:38 03:26:40 03:26:43

So how would you determine the thermal resistance of the heat sinks based on the flow rate? Would you measure the thermal resistance and the flow rate? 03:26:46 03:26:49 03:26:54 03:26:56

A That would be one way of doing it. You could also use some correlations, like calculations, to -- you know, the physical properties of the liquid, and you could use them along with some heat transfer correlations to estimate the resistance. That's kind of the second way. 03:26:57 03:26:59 03:27:05 03:27:10 03:27:14 03:27:20

So there's an experimental way. There is a typical way where you can use some correlations and calculations like a spreadsheet analysis. You could also do more detailed computer code-based modeling. 03:27:22 03:27:25 03:27:28 03:27:31

Q And the -- so the -- what would the computer code-based modeling be? 03:27:37 03:27:46

A So there are -- you know, there are existing computer codes, like flow term that do a reasonable job. 03:27:48 03:27:54 03:28:02

Of course, you need to know what you are modeling and describe all the conditions for the model accurately and, you know, use the right inputs 03:28:02 03:28:04 03:28:10

in those models, in those computer codes to create a model for the heat sink in this case, along with the fluid flow including its -- you know, things like velocity, other physical parameters, and those computer codes solve the heat transfer equations and the flow dynamic situations, right, especially convection radiation, also continuity to estimate the thermal resistance. 03:28:18 03:28:23 03:28:30 03:28:35 03:28:40 03:28:43 03:28:46 03:28:52

Q For the first two methods that you mentioned, you said correlations like calculations, you know, the physical properties of the liquid, you could use them along with some heat transfer correlation to estimate the resistance, that would involve using some equations, right? 03:28:56 03:28:59 03:29:02 03:29:04 03:29:07 03:29:10

A That's right. 03:29:12

Q Okay. And then the next one was the experimental way, and that would be like you would conduct an experiment to actually examine the flow? 03:29:12 03:29:15 03:29:18

A Yes. 03:29:21

Q And what -- what would that entail? 03:29:21

A So that may entail, you know, having a known amount of flow leak through the system, through the miner in this case, of the heat sink of the miner, and reading that flow rate and measuring temperature of the chip which will then allow you to 03:29:25 03:29:29 03:29:35 03:29:38 03:29:41

calculate the thermal resistance. 03:29:43
Q Okay. Okay. So now I want to ask you 03:29:46
about a different subject, which is a term -- some 03:29:59
terms that the patent uses. 03:30:03
Circulation facility, does the patent 03:30:05
define that term? 03:30:08
A I know the patent uses that term. I do not 03:30:17
recall right now if it explicitly defines the 03:30:21
circulation facility. 03:30:25
Q You should look through it as much as you 03:30:44
feel is appropriate. I'm not going to rush you at 03:30:47
all, but I will just say, if it's helpful, I looked 03:30:49
for this, and I did not find a definition of 03:30:53
circulation facility in the patent. 03:30:55
A I mean I think it's essentially -- you 03:30:57
know, it describes at some points like circulation 03:31:04
facility 28 as fluid circulation facility something 03:31:07
that is going to have -- circulate the fluid through 03:31:14
the primary circuit. 03:31:18
Like, for example, for 28 is flowing the 03:31:20
dielectric coolant through the tank -- through its 03:31:29
plenum, then through the tank, and through the rear 03:31:34
recovery section and so forth. So that's like 03:31:36
column 4, line 50 I mean, but that may not be the 03:31:41
first place where it mentions that. The circulation 03:31:46

facility 28, I think it's just like column 3, line 03:31:55
64. 03:31:58
Q Well, let me ask you then, what's your 03:32:03
understanding if you had -- just explain, what is a 03:32:06
circulation facility? What is a circulation 03:32:08
facility? 03:32:12
A Yes, circulation facility means something 03:32:14
that, you know, facilitates the movement of coolant. 03:32:17
Q And the patent also uses both fluid 03:32:36
circulation facility and simply circulation 03:32:41
facility. 03:32:44
So is the difference between those two 03:32:45
things simply that, in a fluid circulation facility, 03:32:47
it's a fluid that's circulated whereas in a 03:32:51
circulation facility, it can be any coolant that's 03:32:54
circulated? 03:32:58
A I don't think that we're trying to 03:33:07
differentiate between the fluid circulation facility 03:33:09
and circulation facility in the patent. 03:33:12
Q I mean, you know, it's a patent. It uses 03:33:15
slightly different terms. So I'm just trying to 03:33:17
understand if there's a difference there. 03:33:20
A Yeah, I mean I think -- 03:33:22
Q So your view is the circulation facility 03:33:22
and the fluid circulation facility, those are 03:33:25

referring to the same kind of thing? 03:33:28
A I believe so in general, but if you could 03:33:29
point me to a specific location that you're asking 03:33:33
me about, this is slightly -- 03:33:35
Q Well, in the claim, it refers to the 03:33:37
primary circulation facility and the secondary fluid 03:33:38
circulation facility and so -- 03:33:42
A I believe that -- you know, I think like 03:33:45
the primary circulation facility adapted to 03:33:55
circulate the dielectric fluid. So I would posit 03:33:58
that the primary circulation facility is also the 03:34:02
primary fluid circulation facility because it uses 03:34:06
the phrase later on to say it moves dielectric fluid 03:34:12
through the tank. 03:34:16
Q Understood. Okay. So then -- and what is 03:34:24
the purpose of the secondary fluid circulation 03:34:40
facility in your understanding? 03:34:43
A Yes. Secondary fluid circulation facility 03:34:45
has two things it does. It extracts the heat from 03:34:48
the primary circulation facility, and then it 03:34:59
dissipates it to the environment. 03:35:00
Q Okay. Now, what is a closed loop 03:35:08
circulation facility? 03:35:10
A Sorry. You're talking about where here 03:35:15
right now? 03:35:17

Q Let's see. I'm really asking generally. I 03:35:18
think the patent uses that term, but let's see. Oh, 03:35:24
it refers to circulation loops. 03:35:30
But I mean do you recognize closed loop 03:35:34
circulation facility as a term you know -- as a 03:35:36
person of more than ordinary skill in the art, do 03:35:41
you have an understanding of what a closed loop 03:35:44
circulation facility is? 03:35:46
A Yeah. A closed loop circulation facility, 03:35:47
if it uses the modifier closed loop in front of it, 03:35:50
you know, would mean that you end up where you 03:35:53
started. There is, you know, sort of 360-degree 03:35:58
turn, right, as against just a simple circulation 03:36:03
facility which may define just flow going through 03:36:06
something. 03:36:10
Q So the loop means that what is circulating 03:36:16
comes back to where it began? 03:36:18
MR. THOMAS: I'm going to object. He said 03:36:20
closed loop. 03:36:22
BY MR. HALPERN: 03:36:22
Q I'm sorry. Closed loop means the thing 03:36:22
that's circulating comes back to where it began? 03:36:26
A That's right. 03:36:28
Q Okay. And an open loop facility would 03:36:29
be -- is that a simple circulation facility which 03:36:38

just may refer to flow going through something? 03:36:41
A Again, if there is some particular 03:36:43
reference in the patent, if you could point me to 03:36:45
that. 03:36:49
Q Well, I'm just asking you again as a person 03:36:49
of ordinary skill in the art. 03:36:51
A Okay. Not concerning this patent, right, 03:36:54
if you're asking questions like -- you know, because 03:36:56
the claim language here uses circulation facility 03:37:01
and some claims closed loop, I believe, right, 03:37:03
that's why I just want to -- 03:37:08
Q Actually I didn't realize that. I thought 03:37:10
this was a term that was not in the claims. You 03:37:12
know, the only claims asserted here are one and five 03:37:15
and I don't think either of those uses these terms. 03:37:17
Yeah, so I'm just asking your understanding 03:37:21
as a person of ordinary skill in the art of -- yeah, 03:37:23
the other -- or let's say not open loop -- I think 03:37:30
you already said this, right. 03:37:34
There's a closed loop which you defined and 03:37:35
then you said otherwise there are -- there are 03:37:37
facilities that simply have flow of some kind, but 03:37:40
without a return of the fluid to its margin point; 03:37:45
is that fair? 03:37:49
A I think that's a reasonable 03:37:50

characterization. 03:37:52
Q Okay. So what's the -- what's the 03:37:52
advantage of a closed loop circulation facility 03:37:55
over -- 03:37:58
MR. THOMAS: In what context? Vague. 03:37:59
BY MR. HALPERN:
Q I'm asking -- you know, it's something that 03:38:02
people use. 03:38:04
Why do people use a closed loop circulation 03:38:05
facility when they do in general? 03:38:08
A I mean if you -- if you do not want to lose 03:38:11
your coolant, like, for example, in many water 03:38:18
cooling kind of implementations like, you know, if 03:38:22
you have on, like, direct-to-die liquid cooling, 03:38:26
those kind of systems that I was describing I have 03:38:33
worked on, those are closed loop cooling facilities 03:38:35
because they are -- you know, you use the water or 03:38:38
the water glycol mixture and that goes over a cold 03:38:43
plate and then it goes through the heat exchanger. 03:38:48
It gets its heat from the heat exchanger and then 03:38:51
comes back. 03:38:53
The open loop circulation facilities are 03:38:54
like, you know, using -- like in a data center, 03:38:56
using the city water to remove the heat from a data 03:39:00
center level, right, that's like an open loop water 03:39:03

because you just bring in this water from the city 03:39:06
or in a reactor, right, or a thermal power plant, 03:39:10
you may just bring in water from a river or a lake 03:39:16
and, you know, use that to cool the -- whatever you 03:39:19
need to cool in terms of the excess heat that didn't 03:39:22
get converted into electricity and then rejected 03:39:28
back in the river, that's sort of an example of open 03:39:31
loop cooling facility. 03:39:34
Q Okay. And so you mentioned that one reason 03:39:35
to prefer the cold loop -- I'm sorry -- the -- 03:39:39
A Closed.
Q Scratch, closed, yes. 03:39:43
One reason to prefer the closed loop is to 03:39:45
preserve the coolant, to not lose the coolant? 03:39:50
A Yeah, to use the same coolant to keep going 03:39:53
back. 03:39:57
Q Is there any other reason that you would 03:39:57
want to use the -- prefer the closed loop to the 03:40:00
open system? 03:40:03
A I suppose there are -- there could be any 03:40:04
idea of other reasons. 03:40:11
MR. THOMAS: Just object as vague, 03:40:15
ambiguous, improper hypothetical. 03:40:17
THE WITNESS: Primarily if you want to just 03:40:24
attach the first goal, right, to -- you know, you 03:40:29

don't want to have just -- you don't have a source 03:40:30
of water to cool your desktop computer, if it is 03:40:33
using liquid coolant, right, you don't want to 03:40:38
connect it with your tap and have a line going back 03:40:41
to the drain in your home, right. So you just want 03:40:43
to remove the heat from the CPU, reject it, and 03:40:50
bring the same coolant back. 03:40:53
BY MR. HALPERN: 03:41:06
Q I mean is it often true that, you know, the 03:41:06
closed loop will be more expensive to build, but 03:41:08
then you get a long-term savings because once you've 03:41:12
built it, then you're preserving your coolant by 03:41:15
circulating it as opposed to an open loop which 03:41:20
might be cheaper, but you need something that you're 03:41:24
not retaining to do the cooling? 03:41:26
MR. THOMAS: Well, I'm just going to object 03:41:28
as relevancy. It exceeds the scope of his opinions 03:41:31
in the case. 03:41:34
THE WITNESS: Again, it's an engineering 03:41:36
problem and you could look at -- -
THE REPORTER: I'm sorry. It's a what
problem?
THE WITNESS: It's an engineering issue. 03:41:43
You need to, you know, consider quite a few 03:41:43
different things, right. So I wish there was a very 03:41:47

simple answer that, you know, A, use open, B, use closed. 03:41:49 03:41:55

The reality is more nuanced. If you use a closed loop, you need in the end additional heat exchanger to reject the heat eventually. If you use open loop, you take the heat in coolant, and then you just reject that coolant itself or you take the heat in the fluid and reject that fluid itself out somewhere. So, again, it's situational. 03:41:55 03:42:02 03:42:06 03:42:13 03:42:18 03:42:22 03:42:25

BY MR. HALPERN: 03:42:33

Q Okay. You said you need additional heat -- I'm just seeing the transcription here -- you need additional heat exchangers to reject the heat in a closed loop because you wouldn't necessarily need it in an open loop -- in an open circulation facility, correct? 03:42:33 03:42:43 03:42:46 03:42:48 03:42:51 03:42:54

MR. THOMAS: Yeah. Objection; relevancy and exceeds the scope of his expert report. 03:42:54 03:42:57

THE WITNESS: Yeah, yes, I mean in a closed loop, all you're doing is bringing the heat into the fluid. You still need to reject it through some other means, heat exchangers, adiabatic coolers, etcetera. 03:43:01 03:43:04 03:43:09 03:43:15 03:43:23

BY MR. HALPERN: 03:43:23

Q Right. And with an open system, you don't 03:43:23

necessarily need to do that or you don't need to do that? 03:43:25 03:43:28

A Open system, you are rejecting the heat into something that, you know, eventually like in the case of a power plant getting cooled by water from the river. The water is going to go back to the downstream after. 03:43:28 03:43:31 03:43:33 03:43:36 03:43:39

Q Okay. Now, I want to ask you about another claim element which is coordinating the operation or to coordinate the operation of the primary and secondary fluid circulation facilities. 03:43:41 03:43:45 03:43:48 03:43:51

I don't think the patent defines this either and I -- just to -- you know, again, you should absolutely feel free to look at anything you want to look at in the patent, but I would direct you to column 5, lines 16 to 56. This is sort of the first full paragraph in column 5. 03:43:56 03:43:58 03:44:02 03:44:04 03:44:08 03:44:15

A 15 through where? 03:44:29

Q 15 through 56. So it's like the first full column -- paragraph of column 5 -- 03:44:30 03:44:35

A Got it. 03:44:36

Q -- that I think -- that's the place in the patent where the coordination of the primary and secondary circulation facilities is described. 03:44:40 03:44:42 03:44:44

A Okay. I've read it. 03:45:27

Q Okay. And so that discussion talks about some of the details, I believe, of how each of the facility -- what each of the facilities does. And then it concludes -- this is starting at column 5, line 53 -- "In general, the goal is to maintain the temperature of the dielectric fluid in the tank between a predetermined minimum temperature and a predetermined maximum temperature." 03:45:29 03:45:42 03:45:45 03:45:47 03:45:52 03:45:56 03:45:59 03:46:03

A Yes. 03:46:05

Q So is it fair to say that that is -- I mean it says "the goal," that is the purpose of the control facility that coordinates the operation of the primary and secondary fluid circulation facilities? 03:46:05 03:46:07 03:46:14 03:46:16 03:46:19

A I believe that's what the claim states. "The control facility adapted to coordinate the operation of the primary and secondary fluid circulation facilities as a function of the dielectric fluid in the tank." 03:46:26 03:46:39 03:46:42 03:46:43 03:46:46

Q Right. But I was asking something different that the claim doesn't explain, which is why you're coordinating the operation of the two circulation facilities and then there's this description that concludes with, "In general, the goal is to maintain the temperature of the 03:46:48 03:46:50 03:46:54 03:46:58 03:47:01 03:47:04

dielectric fluid in the tank between a predetermined minimum temperature and a predetermined maximum temperature." 03:47:07 03:47:09 03:47:12

And I'm basically just asking if you agree that that is the goal of coordinating the operation of the primary and secondary circulation facilities. 03:47:13 03:47:15 03:47:17

A That's not limiting. You also want to make sure that your miners are operating below their specified temperatures, right, or whatever is your objective for cooling, even that is being cooled to spec or, you know, that the -- the heat sources are within their spec for temperature. 03:47:20 03:47:26 03:47:32 03:47:35 03:47:43 03:47:47

Q Now, does the patent ever talk about the server temperature itself? 03:48:16 03:48:24

MR. THOMAS: I'll just object. The document speaks for itself. 03:48:37 03:48:38

THE WITNESS: I think it's kind of obvious that this entire patent is to try to cool a heat source or a computer appliance rack below -- keep it below its spec temperature, right. That's the whole point of the entire application -- the entire patent. 03:48:58 03:49:02 03:49:12 03:49:19 03:49:24 03:49:35

It's, you know, maybe mentioned in one of the provisionals or, you know, which are incorporated here or, you know, in the background of 03:49:35 03:49:38 03:49:41

the invention where it talks about the related arts, you know, I think, but to a person of ordinary skill in the art, right, the whole point of all of these immersion cooling facility that it describes is to keep the computer, specifically the chips, the CPUs and some other chips below its spec temperatures. 03:49:45 03:49:49 03:49:52 03:49:58 03:50:02 03:50:07

BY MR. HALPERN: 03:50:11

Q Assuming you're right that that is the ultimate goal of the whole thing is to keep the chips operating below spec temperatures, is it fair to say that the patent's way of achieving that that it describes is maintaining the -- monitoring and controlling the temperature of the dielectric fluid between a minimum and a maximum or even leave out the between minimum and the maximum, it's focused on controlling the temperature of the dielectric fluid? 03:50:11 03:50:14 03:50:16 03:50:24 03:50:27 03:50:33 03:50:37 03:50:41 03:50:43

MR. THOMAS: Objection. You're asking his interpretation of the patent? 03:50:47 03:50:48

MR. HALPERN: Yeah. 03:50:49

MR. THOMAS: Okay. The document speaks for itself. 03:50:51 03:50:53

Subject to that, you can give your understanding. 03:50:54 03:50:55

THE WITNESS: So what it presupposes is that it's fixed load -- fixed thermal power from the 03:51:01 03:51:03

components in the computing system in this case, and, therefore, there is -- if you know the fluid temperature that tells you the temperature of the CPU or some other component, so that's kind of in the background based on the knowledge of a person with ordinary skill, that's why it says that if you just know the temperature of the fluid, as long as it is between certain range, your chips are going to be within their specified temperature limits. 03:51:07 03:51:11 03:51:18 03:51:23 03:51:27 03:51:30 03:51:34 03:51:38 03:51:46

BY MR. HALPERN: 03:51:48

Q Where does the patent say that? 03:51:48

A As I mentioned, that's knowledge of person of ordinary skill in the art. 03:51:50 03:51:53

Q Okay. So the patent doesn't talk directly about the chip temperature. It talks about a fluid temperature, but a person of ordinary skill would understand the chip temperature -- that the fluid temperature is related to the chip temperature? 03:51:55 03:52:00 03:52:03 03:52:05 03:52:08

A Yeah, only thing I would add along with that is the -- all the background and provisionals, I do not have that in front of me, and I do not remember them exactly if they talk about this particular topic or not. It's frankly so fundamental and rudimentary that you kind of just know it as background. 03:52:12 03:52:14 03:52:20 03:52:23 03:52:25 03:52:30 03:52:34

Q Okay. Now, I wanted to ask you one other thing about -- because I'm trying to get this coordination of the primary and secondary circulation facilities, and so back to that section that I asked you about five -- column 5, that big paragraph which you read. 03:52:35 03:52:40 03:52:43 03:52:45 03:52:50 03:52:53

A Yes. 03:52:55

Q That really describes, as I understand it and I am just a lawyer, not an expert, the coordination as something that involves controlling flow, right, that that's what they mean by coordinating the two facilities is -- 03:52:56 03:53:05 03:53:11 03:53:22 03:53:37

A That would be one interpretation, right, but I think the claim itself is not kind of limiting it to. 03:53:45 03:53:49 03:53:53

Q Yep, yeah, I'm not -- I'm not suggesting this is definitional. I'm just asking you, you know, kind of -- this seems to be the description to me and how you understand what it's talking about. 03:53:55 03:53:58 03:54:03 03:54:05

MR. THOMAS: I'm just going to object as vague and ambiguous. 03:54:09 03:54:11

THE WITNESS: I'm sorry. Your question is? 03:54:17

BY MR. HALPERN: 03:54:19

Q This is a description of -- as I understand it, of column 5, but in column 5, there's a 03:54:19 03:54:22

description of coordinating the function of the primary and secondary fluid circulation facilities, and I guess -- well, I actually am asking, if not for a definition, at least for an understanding -- your understanding of what that means, like what is going on when the patent talks about coordinating the function of the primary and secondary fluid circulation facilities? 03:54:25 03:54:30 03:54:35 03:54:39 03:54:41 03:54:43 03:54:46 03:54:50

MR. THOMAS: Objection. The document speaks for itself and the question is vague and ambiguous. 03:54:52 03:54:53 03:54:57

THE WITNESS: Yeah, so it could mean like for them to switch something on or off or change certain quantity of flow, like maybe that is overheating and you need to shut down the system, right. That could be another example, I believe, of coordinating. 03:54:57 03:55:08 03:55:11 03:55:17 03:55:19 03:55:23

BY MR. HALPERN: 03:55:27

Q Are you coordinating the flow when you just change one thing in one of the facilities, right? So let's say -- 03:55:27 03:55:29 03:55:32

A Yeah, yeah. 03:55:33

Q -- you know, like you receive -- you see that the miner is too hot and you turn off the miner. 03:55:35 03:55:43 03:55:45

Is that action coordinating the flow -- 03:55:47
coordinating the function of the primary and 03:55:52
secondary fluid circulation facilities? 03:55:54
MR. THOMAS: Objection; vague and 03:55:57
ambiguous.
You can answer. 03:55:59
THE WITNESS: I -- I believe so, right. If 03:56:00
you switch something off, right, that's coordinating 03:56:03
the operation of that facility, if you have to 03:56:07
switch it off or if you have to change the flow 03:56:13
rates or -- 03:56:16
BY MR. HALPERN: 03:56:17
Q But I'm asking just switching something off 03:56:17
in one facility, is that coordinating the operation 03:56:20
of that facility with the other facility? And 03:56:23
specifically I asked about the tank, right. So if 03:56:27
you're switching off a miner, the miner is in the 03:56:30
primary circulation facility, just that step, are 03:56:33
you coordinating the operation? 03:56:36
A I want to make sure I understand your 03:56:39
hypothetical correctly. 03:56:41
Q Sure.
A So in the tank, it has a bunch of miners in 03:56:45
it and you switch off the flow to this entire tank? 03:56:45
Q No. 03:56:48

A No.
Q No, you don't do anything with flow. Okay? 03:56:48
A Okay. 03:56:51
Q Okay. You just see a heat map, one of the 03:56:51
miners is too hot, and you just switch off that 03:56:54
miner? 03:56:57
A Right. 03:56:57
Q You don't do anything -- 03:56:57
A Right, yeah, yeah. 03:56:59
Q -- else. 03:56:59
A Right. 03:57:00
Q Is that switching off of the miner in the 03:57:00
tank coordinating the function of the primary and 03:57:06
secondary fluid circulation facilities? 03:57:09
A I believe the answer is yes. 03:57:12
Q And how -- how are you coordinating the 03:57:14
operation of the two facilities when you switch off 03:57:17
a miner? 03:57:19
A Right. So when you're switching off a 03:57:20
miner, it's going to change the primary circulation 03:57:22
facility flow characteristics because now you, for 03:57:27
one, you know, you're essentially relying on the 03:57:36
heat from the miner that changes -- that the density 03:57:42
of the -- of your dielectric coolant which means 03:57:47
there is buoyancy force which means -- 03:57:58

THE REPORTER: Which means what?
THE WITNESS: The buoyancy force.
THE REPORTER: Buoyancy?
THE WITNESS: Buoyancy force, yeah, thank 03:58:00
you. And the buoyancy, you know, accelerates the 03:58:01
hot coolant to go up. So you are essentially 03:58:09
changing the primary coolant characteristics. 03:58:14
And then depending on how many miners are 03:58:17
shut off and so forth, you may be changing something 03:58:21
on the secondary side also. But you're saying if, 03:58:23
in your hypothetical, there was nothing that was 03:58:28
changing on the secondary side, you still are 03:58:30
changing based on certain signal. If you switch off 03:58:32
one of the miners, you are changing the primary 03:58:39
coolant -- primary circulation facility, I should 03:58:45
say. 03:58:49
BY MR. HALPERN: 03:59:05
Q Okay. Now, I want to direct you to column 03:59:05
8, 47 to 54 in the patent. I'll read this. It 03:59:09
says, "It will be recognized that, in all of the 03:59:17
embodiments described herein, emphasis was placed on 03:59:20
minimizing the total volume of the dielectric fluid 03:59:23
circulating throughout each immersion module" -- 03:59:29
excuse me -- "10. We submit that the key concept 03:59:32
here is to move the secondary fluid to the point of 03:59:35

heat exchange with the primary fluid, rather than to 03:59:37
move the primary fluid to the point of heat exchange 03:59:40
with the secondary fluid." 03:59:44
And then it goes on to explain "all of the 03:59:47
essential components of the primary circulation 03:59:49
facility are tightly colocated to form a 03:59:52
highly-integrated module." 03:59:54
And then it concludes, "Further, our 03:59:57
placement of the reservoir 42 outside of (but 03:59:59
immediately adjacent to) the tank 14 tends to reduce 04:00:02
the total volume of the dielectric fluid." 04:00:05
Did I read that accurately? I know part of 04:00:13
it I paraphrased but -- 04:00:16
A Yes. 04:00:17
Q Okay. So do you infer from that discussion 04:00:18
that the reason for having the secondary fluid 04:00:21
circulation facility is to reduce the volume of 04:00:25
dielectric fluid you need to use? 04:00:28
MR. THOMAS: Objection; vague and ambiguous 04:00:31
and the document speaks for itself. 04:00:35
THE WITNESS: So your question is that do 04:00:41
I -- could you repeat the question for me? 04:00:43
BY MR. HALPERN: 04:00:47
Q Sure. I read the passage which is 47 to 04:00:47
54, and then I asked if you glean from that passage 04:00:50

that I read that the reason for having the secondary fluid circulation facility is to reduce the amount of dielectric fluid that you need to use? 04:00:54 04:00:58 04:01:01

MR. THOMAS: Objection; also calls for speculation. 04:01:04 04:01:06

THE WITNESS: I mean that is one of the things they mentioned here, right, is in the embodiments that are described, right, there is -- as the document kind of states, it's one of the results of that is to minimize the total volume of the dielectric fluid. 04:01:09 04:01:11 04:01:15 04:01:18 04:01:26 04:01:30

BY MR. HALPERN: 04:01:30

Q Right. And is that because dielectric fluid is expensive and water is cheap in your understanding? I'm asking for, you know, as a person of skill, if that's what you think is the motivation there. 04:01:30 04:01:34 04:01:41 04:01:43 04:01:45

A Sure, I mean but also there are some other -- if you have to use this water to exchange heat with the dielectric fluid, then you also need a heat exchanger, and there is a cost of the heat exchanger. 04:01:45 04:01:49 04:02:00 04:02:05 04:02:07

Again, in entering a new system, you have to weigh the cost and complexity of integrating one more piece of hardware in the system and the 04:02:08 04:02:10 04:02:14

maintenance it might take and, you know -- - 04:02:19

THE REPORTER: I'm sorry. The what?

THE WITNESS: The maintenance and what kind of failures it might have. You might have fouling of that heat exchanger and, you know, leaks in that heat exchanger. So you need to weigh that against the cost of the dielectric coolant in this case. 04:02:22 04:02:22 04:02:25 04:02:28 04:02:34

BY MR. HALPERN: 04:02:55

Q Are you familiar with both single loop and dual loop cooling systems? 04:02:55 04:02:57

A I mean that's a very broad, broad question. You may have to constrain it a little bit, but like, you know, I mean I think you may have two loops in parallel to cool a CPU, that's a dual loop system to me. I don't know if that's what you're describing. 04:02:59 04:03:06 04:03:08 04:03:14 04:03:19

Q You have an understanding of single loop system and dual loop system as a person of more than ordinary skill, correct? 04:03:20 04:03:23 04:03:28

A Yes. I mean all I'm saying is that dual loops may define a lot of different things, and to really accurately answer whatever question you might have, I would just reserve my right to kind of define the dual loops more later. 04:03:28 04:03:31 04:03:33 04:03:35 04:03:40

Q Okay. Fair enough. What is -- what is a single loop embodiment -- sorry. 04:03:44 04:03:48

What is a single loop cooling system? 04:03:50

MR. THOMAS: Vague as to what context. 04:03:53

MR. HALPERN: Again, he's a person of ordinary skill in the art. 04:03:57 04:03:58

MR. THOMAS: Are you talking about air-cooled system? You started to talk about those. 04:03:59 04:04:00

MR. HALPERN: Well, no. 04:04:03

Q Obviously if I'm asking at that level of generality, I'm asking what are single loop systems. They may have different fluids in the loop, but, yeah, what's a single loop cooling system. 04:04:04 04:04:06 04:04:08 04:04:10

A I mean not talking about the patent in question here, right. I mean, you know, this one has a -- specifically defines, you know, circulation facility in all of that, right. 04:04:13 04:04:15 04:04:18 04:04:22

So a single loop to a person of ordinary skill in the art would mean like if it has a closed loop system, first of all, on that, it will have a liquid flowing through a pumped loop that forces coolant to go over a processor or a GPU or memory, some heat source, pick up the heat from there, go to a heat exchanger, reject the heat there, and come back. That would be an example of a closed loop single loop cooling system. 04:04:24 04:04:29 04:04:33 04:04:36 04:04:42 04:04:47 04:04:50 04:04:53 04:04:58

BY MR. HALPERN: 04:05:00

Q Okay. And I wasn't specifying closed loop, but just single loop in my question, but right -- 04:05:00 04:05:05

A Loop to me means closed loop in general. 04:05:08

Q Okay. 04:05:11

A And I'll -- 04:05:12

Q Okay. I appreciate that clarification. Thank you. All right. 04:05:13 04:05:16

Does the '457 patent describe a single loop embodiment? 04:05:19 04:05:23

MR. THOMAS: Vague and ambiguous. 04:05:30

You can answer the question if you understand it. 04:05:32 04:05:33

THE WITNESS: One of the embodiments it describes is the -- on -- in Figure 12 has -- has more than one -- one cooling loop, at least the way it is described on Figure 12. 04:05:37 04:05:42 04:05:56 04:06:00

BY MR. HALPERN: 04:06:03

Q Right. So that's a dual loop. So I'm asking, is there a single loop embodiment that the patent contains or describes? 04:06:03 04:06:05 04:06:08

A This -- again, this is not describing the circulation facility. Okay. Circulation facility is likely different than a closed loop. Okay. So the patent itself in its main embodiment is describing a two closed loop system. 04:06:10 04:06:30 04:06:34 04:06:40 04:06:43

Q Yeah, I'm simply asking, does it have anywhere a one loop -- a single loop system as an embodiment in this patent? 04:06:49 04:06:53 04:06:57

A Yes. 04:06:58

Q Okay. And where is that? 04:06:59

A Point you to column 9, lines 15 through 17. 04:07:00

Q Okay. So column 9, lines 15 through 17, says "Similarly, practitioners in the art will readily recognize that other, known secondary circulation facilities may be employed effectively, including," and then, you know, forced air, vapor compression systems, earth-water sink loops, waste heat recovery, and recycling systems and the like. 04:07:19 04:07:24 04:07:27 04:07:29 04:07:32 04:07:37 04:07:39

Is that what you're referring to? 04:07:42

A Right. 04:07:43

Q And that would -- how does that describe a single loop? 04:07:44 04:07:46

A So what -- okay. So let's take the case of earth-water sink loops. What that might mean is that you take the dielectric coolant, you pump it in the earth through some sort of serpentine tube that is going in. 04:07:49 04:07:53 04:07:58 04:08:04 04:08:08

If you go a few feet under the earth, the temperatures there are literally constant, okay, and they are much -- you know, typically, you know, on a 04:08:11 04:08:14 04:08:18

hot day outside temperature might be like, let's say, 75, but under -- you go -- or even a hundred degrees Fahrenheit. 04:08:20 04:08:23 04:08:27

But if you go maybe six to ten feet under, I don't remember the exact numbers, the temperatures are much lower. So you can sink the heat from all of these miners in a geothermal heat sink, right. That's an example that it is talking about right here which is -- in your definition, will be a single loop. 04:08:29 04:08:32 04:08:34 04:08:38 04:08:43 04:08:46 04:08:48

Second thing it mentions is -- 04:08:50

Q Let me interject a question, though. Could an earth-water sink loop be a dual loop system? 04:08:51 04:08:54

A It could be dual loop. It could be ten loops also, but it could be single loop. That's the question that you asked. 04:09:00 04:09:02 04:09:04

Q No, I asked if it has an embodiment and you're saying it refers to a type of system that could be implemented as a single loop, but it doesn't describe a single loop embodiment, right? 04:09:04 04:09:07 04:09:10 04:09:13

A It describes a single loop embodiment because it's saying the secondary circulation facility may imply, you know, the secondary circulation facility -- sorry -- "In the art will readily recognize that other, known secondary 04:09:16 04:09:18 04:09:20 04:09:26 04:09:32

circulation facilities may be employed effectively, including forced air" -- I'm coming to that in a moment -- "vapor compression systems, earth-water sink loops," right, and it goes on to describe other things also, "waste heat recovery and recycling" -- 04:09:34 04:09:38 04:09:41 04:09:44 04:09:47

THE REPORTER: I'm sorry. With what?

THE WITNESS: "Waste heat recovery and recycling systems." So the waste heat recovery, I will come to that also in a moment. 04:09:59 04:10:00

So -- but in the case of a water sink loop, the most efficient thing would be to just take the coolant, pump it underground, and reject the heat to the cooler temperatures that subsist under the earth, right. So I mean that's an example of that. 04:10:01 04:10:04 04:10:07 04:10:13 04:10:18

The second example, let's talk about the waste heat recovery. So in the waste heat recovery, what you're trying to do is take all the heat from these miners and use it effectively for district heating or some other hot water needs. 04:10:19 04:10:22 04:10:25 04:10:28 04:10:31

So what you would use is an open loop on this other side, so you have the primary loop, and you exchange heat from there with some water that you are going to use for hot water need. 04:10:34 04:10:37 04:10:42 04:10:44

Let's say your miners are close to this building and it's a cold day like today, you can 04:10:49 04:10:52

take that hot -- that heat from all the miners and use it in an effective manner to heat the building. 04:10:55 04:10:58

That's an example of an -- what you would call an open loop or this is the secondary circulation facility which is not a closed loop in that case, right. 04:11:02 04:11:05 04:11:07 04:11:11

BY MR. HALPERN: 04:11:11

Q Okay. So you would call that you're -- I'm not calling anything anything, but you would call that a single loop system? 04:11:11 04:11:18 04:11:20

A That would be a single closed loop system. 04:11:22

Q But none of those things are described in the patent? Those are things that you -- 04:11:27 04:11:38

MR. THOMAS: Objection -- 04:11:40

BY MR. HALPERN:

Q -- as a person of ordinary skill in the art recognize are possible implementations of what the patent lists, correct? 04:11:41 04:11:43 04:11:46

MR. THOMAS: Objection; asked and answered, argumentative, and misstates his prior testimony. 04:11:47 04:11:48

THE WITNESS: It explicitly describes the other ways, and they are explicitly saying that it's not limited to what is described in the -- in the embodiment. 04:11:51 04:11:54 04:11:57 04:12:00

There are other embodiments that are 04:12:01

equally possible. The claims contemplate that the way they are written. So I don't know what else is needed to describe that. 04:12:03 04:12:08 04:12:11

BY MR. HALPERN:

Q In your career, you have seen many primary to secondary flow facilities, right? 04:12:16 04:12:18

A Some. 04:12:21

Q Would you agree that the secondary loop normally transports heat to the rejection device? 04:12:27 04:12:29

MR. THOMAS: Objection; improper hypothetical and it -- 04:12:35 04:12:36

MR. HALPERN: It's not a hypothetical. 04:12:38

MR. THOMAS: Okay. Objection -- objection; vague and ambiguous. 04:12:39 04:12:42

THE WITNESS: I mean there may not be a secondary loop like I'm -- 04:12:44 04:12:48

BY MR. HALPERN: 04:12:49

Q No, I'm asking if there is one, what the secondary loop does to transport heat to the rejection device. 04:12:49 04:12:51 04:12:54

MR. THOMAS: In other -- you're talking about -- 04:12:57 04:13:00

MR. HALPERN: In general. 04:13:00

THE WITNESS: So I didn't follow the question at all so -- 04:13:01 04:13:02

BY MR. HALPERN: 04:13:03

Q Okay. A secondary loop in a dual loop system, is the function of the secondary loop to transport heat to the rejection device? 04:13:03 04:13:07 04:13:10

A I mean if there is, if that is the system, right, I mean the secondary loop may be used to reject the heat, right. 04:13:13 04:13:16 04:13:21

I mean the primary loop is rejecting heat through the secondary loop. The secondary loop can have a third loop if that's what your system is, right. You know, it's not limiting -- the patent itself is not limiting to having those loops, certainly not the claim 1. 04:13:22 04:13:25 04:13:28 04:13:31 04:13:37 04:13:40

Q I'm not asking you about the claim. I'm just asking you about -- okay. 04:13:41 04:13:43

Have you ever heard that the fans in a cooling tower are referred to as a secondary circulation loop? 04:13:45 04:13:51 04:13:54

A It's immaterial. I mean I don't -- you know, I don't work on designing of these systems day in and day out, and I don't know what different people call it and certainly sitting here, I cannot represent what the entire world like different people call different things, right. 04:13:56 04:14:00 04:14:05 04:14:07 04:14:10 04:14:13

So I -- I just don't know. All I can do is 04:14:15

read the specifications and the claims and interpret the claims in light of the specifications. 04:14:21 04:14:24

Q Okay. Well, do you know if a person of ordinary skill in the art would recognize, you know, the air side of a cooling tower as a secondary circulation loop? 04:14:27 04:14:29 04:14:33 04:14:37

A I mean the patent expressly -- expressly states that in column 9, line 16, 17 so that question is, you know, moot and I cannot represent what different people would call different things. 04:14:38 04:14:41 04:14:50 04:14:54

Q Okay. So you don't know if a person of ordinary skill in the art would refer to the air side of a cooling tower as a secondary circulation loop? 04:14:59 04:15:03 04:15:05 04:15:10

MR. THOMAS: Objection; asked and answered. 04:15:10

THE WITNESS: Personally, you know, to me, it's like the primary is the first. Anything after that is secondary. So if there is, as the patent claims here, like not claims, states here that the secondary circulation facility may be forced air. 04:15:13 04:15:15 04:15:18 04:15:23 04:15:25

BY MR. HALPERN: 04:15:33

Q Wouldn't forced air refer to a closed air loop? 04:15:33 04:15:36

A No, it will not be closed air loop. Then you will need to remove the heat from that area 04:15:38 04:15:40

again. So that would be, you know, an unnecessary step that would just add cost and complexity as well as energy cost to the system without having any benefit. 04:15:43 04:15:46 04:15:50 04:15:53

So when it says that the other -- the second circulation facility may be forced air, that means that you take the heat from the dielectric liquid and reject it to the ambient air, exactly the way the accused devices are operating. 04:15:54 04:15:58 04:16:01 04:16:06 04:16:14

Q In an air-cooled data center, air is normally circulated in a closed loop, right? 04:16:17 04:16:20

MR. THOMAS: Objection; no foundation. 04:16:25

Go ahead. 04:16:26

THE WITNESS: It may be -- you know, you -- depends, like if it is working in a warm environment, then -- and a dirty environment, then you would do that. 04:16:29 04:16:31 04:16:35 04:16:40

There are many data centers where you bring in air from outside and use that to cool the data center. There are many data centers going in in Iceland and many cold places for that reason. So there's no one size that fits all. 04:16:42 04:16:43 04:16:48 04:16:50 04:16:53

BY MR. HALPERN: 04:17:07

Q Do you want to take a break or keep going? 04:17:07

A I was -- want to ask for a break. 04:17:10

Q Okay. Gotcha. 04:17:12
MR. THOMAS: Okay. 04:17:13
THE VIDEOGRAPHER: Going off the record, 04:17:14
the time is 4:17 p.m. 04:17:15
(Recess taken.) 04:29:49
THE VIDEOGRAPHER: Going back on the 04:29:50
record, the time is 4:29 p.m. 04:29:51
BY MR. HALPERN:
Q Dr. Pokharna, do you recall that the claim 04:29:55
requires the plenum to be, quote, adapted to 04:29:58
dispense the fluid substantially uniformly upwardly 04:30:02
through each appliance slot? 04:30:06
A Yes. 04:30:09
Q Okay. Does the patent define dispense the 04:30:09
fluid substantially uniformly upwardly through each 04:30:15
appliance slot? 04:30:18
Again, I'll give you my view which is it 04:30:19
does not, but obviously you're going to give me your 04:30:31
independent opinion. 04:30:35
A On 4, line 24 through 28, it mentions 04:30:43
"Preferably each appliance slot 18a is supplied via 04:30:50
several rows of orifices, thus generally tending to 04:30:55
reduce the volume of dielectric fluid exiting" -- 04:31:01
THE REPORTER: The volume of what fluid?
THE WITNESS: "Of the dielectric fluid

exiting each orifice and to make the flow of 04:31:09
dielectric fluid more uniform upwardly through the 04:31:14
appliance slots 18." 04:31:17
I believe that is one of the locations 04:31:20
where it talks about the fact that the flow might be 04:31:24
coming through some orifices in the appliance slot 04:31:28
such that it's going upwardly at all locations in 04:31:32
the appliance slot. 04:31:44
BY MR. HALPERN: 04:31:45
Q Okay. Well, I -- you just answered a 04:31:45
question that really is what I wanted to understand 04:31:48
is what your understanding -- I mean you formed an 04:31:50
understanding of the limitation in preparing your 04:31:56
report, right? 04:31:59
A Yes, I did. 04:32:00
Q Okay. And something must be uniform, 04:32:01
right, dispensing the fluid must be uniformly 04:32:09
upwardly. 04:32:13
So what variable is it that must be 04:32:14
uniform? 04:32:17
A If it is upwardly at a relocation, it is 04:32:23
moving upwardly as against going down, going left to 04:32:27
right. 04:32:33
Q So it's uniform upward velocity, like the 04:32:35
velocity is -- 04:32:39

A No, no, no, no, no, no, it's not the 04:32:40
uniform velocity because if you have the flow coming 04:32:44
from some holes, obviously right next to the hole, 04:32:46
the flow is stagnant, right. So then it would just 04:32:49
read out the entire claim just based on the 04:32:53
specification of that. 04:32:56
Q So what is it that must be substantially 04:32:57
uniform? 04:33:00
A Upward. It's the fact that it is moving 04:33:01
upwards, right. That's -- 04:33:03
Q I see. So your reading is as long as 04:33:06
there's upward flow through the appliance slots? 04:33:09
A It's uniformly upwardly, meaning it's not 04:33:12
like some locations it is not going down, right. 04:33:18
It's not going sideways. And that is in contrast 04:33:20
with some of the earlier art. 04:33:29
Q And you agree that this uniform upward flow 04:33:53
must be through each appliance slot? In other 04:33:58
words, each slot has to have uniform flow? 04:33:59
A It's uniformly upwardly, that's the claim 04:34:00
language. 04:34:03
Q Yes.
A So it's flowing -- 04:34:04
Q But it's through each appliance slot. I'm 04:34:06
just asking if it has to be uniform in each slot. 04:34:09

This is in the claim. 04:34:13
A Yes. 04:34:14
Q Okay. And so your view, though, is that if 04:34:24
it were moving upward very, very slowly in half of 04:34:28
the slot and it was moving upward at ten times that 04:34:33
speed in the other half of the slot, it would be 04:34:35
still substantially uniform -- the fluid would be 04:34:40
dispensed substantially uniformly upwardly? 04:34:43
A Sorry. In your hypothetical again, say 04:34:48
that in some location, it is moving at speed X 04:34:50
upwardly -- 04:34:53
Q Yep. 04:34:54
A -- and some other location it is moving at 04:34:54
10X speed? 04:34:57
Q Yes. 04:34:58
A So I think for that, you need to really 04:34:59
understand the substantially, right, the meaning of 04:35:03
the phrase "substantially," right, because it's not 04:35:05
just saying that it's uniformly upwardly. It says 04:35:08
substantially uniformly upwardly as well, right. 04:35:13
So substantially, to understand that, would 04:35:20
mean that, you know, such -- such that it's -- the 04:35:24
function that it is doing is achieved, right. 04:35:39
Whatever is the function of the fluid movement 04:35:45
upward is achieved, right, that's really what the 04:35:48

substantially would mean. 04:35:54
I mean it's really clear from the 04:35:56
specification that nowhere they are saying that the 04:35:58
flow velocity has to be precisely the same 04:36:01
everywhere in the tank, right. That's just not 04:36:04
possible. They talk about having -- 04:36:06
Q Well, it says "substantially." 04:36:08
A -- perforation holes, right, I mean, you 04:36:10
know, just like there are in the accused devices, 04:36:14
you know, and as long as the flow is moving upwardly 04:36:20
and substantially uniformly upwardly, I think that 04:36:29
would satisfy this claim limitation. 04:36:35
Q So in other words, if in half of the slot 04:36:39
it were moving upwardly at speed X and the other 04:36:44
half of the slot, it were moving upwardly at speed 04:36:48
10X, you would consider that to be substantially 04:36:52
uniformly upwardly? 04:36:55
A Yeah. 04:36:57
MR. THOMAS: I'm going to object -- 04:36:58
objection. It's an improper hypothetical, lacks 04:36:59
foundation. 04:37:01
THE WITNESS: Yeah. I mean I would say 04:37:01
that it would -- I mean it is happening in -- even 04:37:03
in the -- in whatever they are describing in this 04:37:07
patent when you put the appliance in the appliance 04:37:12

are going to be different, you know, depending on 04:38:43
the local pressure drop characteristics, right. 04:38:46
I mean I don't think anybody is claiming 04:38:50
that it is exactly precisely the same velocity at 04:38:52
every point. I mean that would be absurd, right. 04:38:54
Q Right. Well, it says "substantially." 04:38:57
A Substantially uniformly upwardly, right, in 04:38:59
each appliance slot, right. 04:39:03
Q Yes, yes. 04:39:05
A So that means if an appliance slot, one, 04:39:06
you are getting some flow through that, right, 04:39:11
average velocity something. In another appliance 04:39:16
slot, you are getting sort of similar velocity 04:39:20
moving upwardly -- 04:39:25
Q But I -- okay. I appreciate that, but I'm 04:39:28
asking a different question which I asked and you 04:39:30
gave an answer, but you didn't answer the question I 04:39:34
asked. 04:39:37
In an appliance slot, in half of the slot 04:39:38
you have upward flow of velocity X and the other 04:39:41
half of the slot, you have upward flow of velocity 04:39:45
10X, so it's all upward flow, but half of the slot 04:39:48
the flow is ten times faster than in the other half 04:39:52
of the slot, is that substantially uniformly 04:39:55
upwardly in that slot? 04:39:59

slot. There are going to be places where the 04:37:16
velocities are going to be different because there 04:37:20
are -- because there are different structures. 04:37:24
The pressure drop along the heat exchange 04:37:27
is different than something else and, you know, 04:37:30
there are holes in the -- at the bottom that they 04:37:32
have contemplated, you know, the orifices as they 04:37:38
describe it on -- for column 4, line, you know, 24, 04:37:40
25, etcetera. 04:37:48
So all of that means that, yes, the 04:37:49
velocity may be changing from place to place and yet 04:37:51
the flow could be uniformly upwardly -- 04:38:00
substantially uniformly upwardly through each of the 04:38:05
appliance slots. 04:38:10
BY MR. HALPERN: 04:38:10
Q Okay. Because uniform just -- in your 04:38:10
view, substantially uniform upward flow means it's 04:38:15
just substantially that it's flowing upward almost 04:38:20
everywhere, even if it's flowing upward at very 04:38:24
different velocities? 04:38:28
A Yeah. I wouldn't say very, right. I mean 04:38:29
very is a -- I don't know. I mean you are talking 04:38:31
about like what kind of differences, but as long 04:38:34
as -- I mean there is no doubt to a person of 04:38:38
ordinary skill in the art that the flow velocities 04:38:40

A So you mean could you define this half 04:40:01
being one on top of another? 04:40:03
Q No, horizontally. 04:40:04
A Side by side. 04:40:08
Q Yes, side by side. So you're at the base 04:40:08
plate, right, and at that point, the upward flow is 04:40:11
X in half of the slot and the other half of the slot 04:40:14
from the base plate it's upwardly 10X. 04:40:17
A Yeah, I think locally, the velocities will 04:40:20
change as the fluid goes through some nooks and 04:40:24
crevices. It may accelerate or decelerate depending 04:40:29
on the local pressure drops. 04:40:33
So the idea is not to match velocities 04:40:35
everywhere in this entire volume. Okay. As long as 04:40:37
it is upwardly, going upward in all of those, and at 04:40:41
a system level, you have, you know, similar flows 04:40:45
happening through each appliance slot, it would 04:40:49
satisfy this claim limitation. 04:40:52
Q Okay. So your answer is, yes, if it's 04:40:53
flowing upwardly everywhere in the slot ten times 04:40:55
faster in half the slot than in the other half of 04:40:59
the slot, that satisfies the limitation of 04:41:02
substantially uniformly upwardly through each slot? 04:41:05
MR. THOMAS: Objection; asked and answered, 04:41:09
mischaracterizes his testimony. 04:41:10

THE WITNESS: In a three-dimensional sense, 04:41:12
right. I mean an appliance in an actual computer 04:41:17
system, the actual computer system is a lot more 04:41:20
complicated than a square rectangular block that is 04:41:23
represented in Figure 11, right. 04:41:26
It has local details, and obviously there 04:41:28
is going to be locations in this tank where the 04:41:32
fluid is going to come through a stagnant point, 04:41:35
right. Anyplace there is a solid in the system -- 04:41:37
excuse me -- there is a solid in the system, the 04:41:40
fluid will come to a complete rest. 04:41:43
So you could say that the fluid velocity 04:41:46
there is zero, right, and that will exist -- that 04:41:48
way the entire patent will be meaningless then, 04:41:52
right. 04:41:55
BY MR. HALPERN: 04:41:55
Q Okay. So you're saying you -- yes is your 04:41:55
answer to my question because you believe that if 04:41:57
you -- if by substantially uniform upward flow one 04:42:00
meant velocity, then the patent would have no scope 04:42:06
because you would not have uniform velocity? 04:42:10
A I'm saying velocity at each and every point 04:42:13
in that volume, in that slot, right. There is 04:42:17
significant volume in the slot. 04:42:21
All I'm saying is that this claim 04:42:23

substantially uniformly upwardly in no sense can 04:42:25
mean that at every point in that volume, the 04:42:30
velocities are exactly the same going upward. 04:42:31
Q Must the velocities be the substantially 04:42:34
the same going upward? 04:42:38
A No, they could be different because there 04:42:39
will be velocities that will be zero at any point 04:42:42
there is a solid. 04:42:45
Q So there's no limitation on how different 04:42:45
they may be? In other words, as long as it's 04:42:48
upwardly everywhere, even if the velocities are very 04:42:50
different, very heterogenous, it still satisfies 04:42:53
substantially uniformly upwardly? 04:42:57
A Look, nobody can argue with one very simple 04:42:59
fluid dynamics fact. If a fluid or a liquid in this 04:43:02
case is in contact with a solid, it will by 04:43:07
definition be at zero velocity at that point. 04:43:10
Q Okay. You're not -- I don't know why, but 04:43:12
you're not answering my question? 04:43:16
MR. THOMAS: Objection; argumentative. Let 04:43:17
him finish his answer, Counsel. 04:43:18
THE WITNESS: All I'm saying is that if -- 04:43:20
since that's one of the most fundamental fluid 04:43:23
dynamics concept, that a fluid in contact with solid 04:43:27
will be -- 04:43:33

BY MR. HALPERN: 04:43:35
Q Yeah. 04:43:35
A -- will be at zero velocity at that point. 04:43:36
It's called no-slip boundary condition. Okay. So 04:43:38
if I were to interpret the screen as the fluid has 04:43:42
to be seeing velocity everywhere, you know, then -- 04:43:47
then nothing can ever satisfy that, even if you 04:43:52
place the smallest object in its spot and it will 04:43:59
have zero velocity. 04:44:02
Q But you also don't require that it be 04:44:04
substantially the same velocity, right? 04:44:06
MR. THOMAS: Objection. 04:44:08
BY MR. HALPERN:
Q You require only that it all be upward flow 04:44:09
regardless of the differentials in velocity that 04:44:12
there may be? 04:44:14
MR. THOMAS: Objection; improper 04:44:15
hypothetical. 04:44:16
MR. HALPERN: I'm not asking a 04:44:17
hypothetical. 04:44:18
MR. THOMAS: Let me make my objection. You 04:44:18
don't have to argue with my objection. Let me 04:44:20
finish my objection on the record, Counsel. 04:44:22
It's an improper hypothetical, lacks facts, 04:44:24
and foundation. 04:44:31

BY MR. HALPERN:
Q I'm just asking for your understanding of 04:44:32
that term. 04:44:34
A Okay.
Q Okay. And your understanding of 04:44:35
substantially uniformly upwardly is that there must 04:44:36
be upward flow throughout the slot or substantially 04:44:41
throughout the slot, but not of any particular 04:44:44
velocity distribution. The velocity may be very 04:44:48
heterogenous.
As long as it's substantially upward flow 04:44:52
everywhere, then that is within the limitation? 04:44:55
A Local velocities will always be 04:45:01
heterogenous. If somebody is trying to prove that 04:45:05
the local velocities have to be constant everywhere, 04:45:07
that's absurd because -- 04:45:12
Q So you're not answering my question. 04:45:13
MR. THOMAS: Objection. Let him finish his 04:45:15
answer, Counsel. You can't interrupt him every 04:45:16
time. 04:45:19
THE WITNESS: So -- so looking at the local 04:45:19
velocities in the context of this patent as 04:45:23
meaningless, you've got to look at global -- 04:45:26
globally. 04:45:32
That is the first thing I would look at, 04:45:33

first interpretation that I have for uniformly upwardly -- substantially uniformly upwardly is that it should be moving up in -- in -- everywhere in the system. 04:45:37 04:45:40 04:45:44 04:45:50

Again, that is in contrast with some of the preexisting systems that had, you know, fluid loops that were forming where fluid was coming from top to bottom or side to side. 04:45:51 04:45:54 04:45:59 04:46:03

In contrast to that, this patent describes substantially uniformly upwardly movement of the dielectric liquids to move the heat from the appliances and locally in some sections, the velocity can be varying within close proximity of each other. 04:46:05 04:46:08 04:46:13 04:46:19 04:46:25 04:46:30

Q Okay. So the velocity has to be varying within close proximity to each other, but if the velocity is very, very different, is that not substantially uniform upward flow? 04:46:31 04:46:34 04:46:38 04:46:40

A Sorry. Yeah, I could not comprehend that question. 04:46:44 04:46:48

Q Okay. You said -- and the last words of your last answer were "and locally in some sections, the velocity can be varying within close proximity of each other." 04:46:48 04:46:49 04:46:52 04:46:57

And so now I'm asking are you saying the 04:46:58

velocity has to be in close proximity or some degree of proximity in all the different parts of the slot to constitute substantially uniform upward flow or can the velocity vary by any amount as long as all of the flow is upward or substantially all of the flow is upward? 04:47:02 04:47:06 04:47:09 04:47:15 04:47:19 04:47:22

MR. THOMAS: Objection; improper hypothetical, vague and ambiguous. 04:47:22 04:47:23

THE WITNESS: Yeah, like I have mentioned before, right, locally the velocity can be varying simply because of the -- 04:47:25 04:47:28

THE REPORTER: Can be waiting?

THE WITNESS: Can be varying and still it could satisfy this claim limitation. 04:47:42 04:47:44

BY MR. HALPERN: 04:47:45

Q By how much can the velocity vary locally and still satisfy the claim limitation in your view? 04:47:45 04:47:49

A Like I said, anyplace where it is solid, the velocity would be zero, right. So I mean I don't think that's a fact that anybody can deny, that the fluid that comes in contact with the solid will be at zero velocity at that location, so, you know -- so, you know, in that sense, there is large variation, zero versus long zero. 04:47:51 04:47:54 04:47:57 04:48:01 04:48:04 04:48:10 04:48:17

Q So if you had zero in some places and a 04:48:19

very fast velocity in other places, would that still meet substantially upward flow? 04:48:23 04:48:25

A That's what the patent describes, right, I mean by definition -- 04:48:27 04:48:29

Q Is your answer yes? 04:48:29

MR. THOMAS: Counsel, let him finish his answer. I know you're trying browbeat the witness, but let him finish his answers before you start with something else. 04:48:30 04:48:32 04:48:37 04:48:39

THE WITNESS: By definition, there is solid structures that are described in this patent, and it describes the flow to be uniformly upwardly, right. 04:48:40 04:48:42 04:48:46

So in that sense, the patent is already describing to a person of ordinary skill that there may be fluid that will be at rest, and there will be fluid in motion through the appliance slot. 04:48:50 04:48:54 04:48:59 04:49:02

So, therefore, yes, the velocity can be varying within the slot by some magnitude right now, whether 1X, 10X, infinite X, right, because it's zero versus 0.01 like centimeters per second, like really, really slow versus zero is infinite time difference, and it's still described in the patent as uniformly upwardly because the local velocities is not what this thing is concerned about. 04:49:06 04:49:11 04:49:14 04:49:18 04:49:24 04:49:28 04:49:30 04:49:34

MR. HALPERN: Okay. Exhibit -- I believe 04:49:37

this is 9. Wrong one. 04:49:39

MR. THOMAS: This is not 9? 04:49:56

MR. HALPERN: No, it's not. I'm sorry. 04:49:57

MR. THOMAS: Already wrote 9 on mine. 04:49:58

MR. HALPERN: Sorry. I hope my curse word is not recorded there. 04:50:01 04:50:07

THE REPORTER: I didn't hear anything. 04:50:10

MR. HALPERN: Thank you. That's 9. 04:50:20

(The document referred to was marked by the Reporter as Pokharna Exhibit 9 for identification and is attached hereto.)

BY MR. HALPERN:

Q So I've given you a portion of the transcript of Christopher Boyd. 04:50:38 04:50:43

Now, did you -- have you spoken with Mr. Boyd? 04:50:46 04:50:50

A He's one of the inventors, right, on this. 04:50:56

Q Yes, I believe he is -- Midas is in the process of amending the inventorship so that he will be the sole inventor. 04:50:59 04:51:02 04:51:05

Is that still true? 04:51:06

MR. KOLEGRAFF: Yes. 04:51:08

THE WITNESS: Yes, I have spoken to Mr. Boyd. 04:51:09 04:51:10

BY MR. HALPERN: 04:51:13

Q Okay. In preparation of your report? 04:51:13
A No. 04:51:19
Q Oh, okay, I see. Have you reviewed 04:51:19
Mr. Boyd's testimony? 04:51:21
A I have reviewed some of his testimony. I 04:51:25
don't remember without reading this that this is 04:51:28
something I have reviewed or not. 04:51:30
Q Okay. So please review page 254, 14 to 04:51:45
256, 13. 04:52:13
MR. THOMAS: You said 256, 13? 04:52:23
MR. HALPERN: Yes. 04:52:25
THE WITNESS: So where should I end 04:53:25
reading? 04:53:27
BY MR. HALPERN: 04:53:27
Q 256, 13. 04:53:27
A Okay. 04:53:29
Q I believe, yes. 04:53:35
A Okay. 04:53:49
Q Okay. In this testimony, Mr. Boyd 04:53:50
testified that the design in his patent which shows 04:53:53
equal-sized holes everywhere which you can see in 04:53:59
Figure 8 -- 04:54:03
A Uh-huh, right. 04:54:04
Q -- would not produce substantially uniform 04:54:07
upward flow because, in his view, the holes had to 04:54:11

be larger and farther from the fluid entry point. 04:54:13
A Sorry. The figure that you showed me when 04:54:16
you pointed -- 04:54:24
Q Yeah, that's -- 04:54:25
A 7, 8, 9? 04:54:26
Q Yes, or 7, 8 that shows the holes. 04:54:28
A Yeah, 7, 8. 04:54:31
Q Yeah. And he believed in this, as he 04:54:36
testified, that to get evenly or uniformly 04:54:38
distributed flow, that the hole should get longer 04:54:41
toward the center of the plenum plate, and 04:54:44
particularly at 255, he testified -- at 255, 16, "As 04:55:29
I said earlier, you have to have smaller holes near 04:55:34
where you're injecting the coolant from the pipe and 04:55:37
the larger holes as you progress to the center or 04:55:39
the other side, depending on how many pipes you have 04:55:42
injecting coolant into the system, into the plenum." 04:55:45
And I asked him, "If you had all the holes 04:55:49
the same size, would you then not get the uniform 04:55:51
flow that you are trying to achieve with the 04:55:54
plenum?" 04:55:56
And he said, "I believed that we would 04:55:56
not."
And then I asked if he still believes that, 04:55:58
and he says, "Yes, at the time I believed that we 04:56:00

would not and I still believe that today." 04:56:03
And then I confirmed with him, "You still 04:56:04
believe that if all the holes are the same size, you 04:56:08
would not get uniform upward flow of coolant through 04:56:11
plenum and through the servers?" 04:56:14
Answer, "Yes." 04:56:15
A Okay. 04:56:16
Q Do you disagree with the inventor of the 04:56:16
'457 patent, Mr. Boyd, on this point? 04:56:20
A I think what he's saying is that it's not 04:56:24
going to be uniform in the sense, it's not going to 04:56:27
be exactly the same everywhere, you know, which is a 04:56:30
fact. It's not going to be exactly the same 04:56:36
everywhere, but that in itself is true and he has 04:56:38
testified to it. 04:56:44
But I don't understand the relevance to the 04:56:45
patent in question here because we are talking about 04:56:48
substantially uniform flow and not uniform flow. 04:56:52
Q But I asked if he believed that the uniform 04:56:55
flow that he sought to achieve in the patent would 04:56:58
be achieved with uniform holes and he said, no, they 04:57:01
would have to vary in size. 04:57:03
It is -- is it not clear from that that he 04:57:06
is understanding uniform flow to refer to a 04:57:10
substantial uniform velocity? 04:57:18

MR. THOMAS: Objection; argumentative, 04:57:20
calls for speculation on what's in the mind of this 04:57:22
witness at the time. 04:57:25
MR. HALPERN: I'm asking him to interpret 04:57:25
the testimony. 04:57:27
MR. THOMAS: You're asking -- you asked him 04:57:28
to say what's in the mind of the witness, and you 04:57:29
can't do that. 04:57:31
MR. HALPERN: I'm asking about the words on 04:57:34
the page. 04:57:36
THE WITNESS: Sorry. So I mean, first of 04:57:39
all, you're saying that the patent is not correct 04:57:41
because it describes the uniform holes to have a 04:57:43
substantially uniform flow upwards. You're saying 04:57:48
that they're amending the patents. I'm sorry. I'm 04:57:52
confused really. 04:57:54
BY MR. HALPERN: 04:57:55
Q No. Actually, Mr. Boyd testified elsewhere 04:57:55
in that deposition that he believed that the patent 04:57:58
elsewhere taught how to achieve uniform upward flow. 04:58:00
A Okay. 04:58:04
Q But what I'm asking you to focus on is he 04:58:05
said this pattern of holes would not achieve uniform 04:58:09
upward flow because you would need smaller holes 04:58:11
near where the inlet is and larger holes farther 04:58:14

away. 04:58:18
MR. THOMAS: I'm going to object that you 04:58:18
mischaracterized his testimony. He gave testimony 04:58:19
about uniformity. He did not give testimony -- 04:58:21
testimony, at least in the segment you had the 04:58:23
witness read, about uniform upward flow. 04:58:25
MR. HALPERN: Yes, he did. I just read it. 04:58:29
"You still believe that if all the holes are the 04:58:31
same size, you would not get uniform upward flow of 04:58:33
coolant through the plenum and through the servers?" 04:58:36
Yeah, and so I'm simply asking based on 04:58:39
this testimony if it is apparent to you that he 04:58:42
understood uniform upward flow to refer to 04:58:46
uniformity of velocity. 04:58:50
MR. THOMAS: Objection; calls for 04:58:53
speculation, mischaracterizes the testimony. 04:58:54
THE WITNESS: There are a lot of claims in 04:58:56
this patent. He -- if you -- I mean if this 04:58:58
testimony was, you know -- I don't know, again, the 04:59:02
context of this, if you're asking him about this 04:59:04
specific claim and this specific language, then it 04:59:08
will be a different matter. 04:59:12
I think he's talking in general, and also I 04:59:13
think this happened -- this seems to be like 04:59:19
different than the patent that Mr. -- Mr. Boyd 04:59:22

himself has filed where these holes are in uniform 04:59:27
size, right. 04:59:33
I mean in a real system that he was 04:59:34
designing, I don't know the specific of what kind of 04:59:37
pressure drops he had, where and what kind of design 04:59:44
he had, and why he had to change his whole sizes to 04:59:47
get it uniform flow. 04:59:51
First of all, that is moot because this is 04:59:54
talking about substantially uniformly upwardly, and 04:59:57
the testimony you are reading is about uniform flow, 05:00:00
two different things. 05:00:04
BY MR. HALPERN: 05:00:11
Q Do you agree, though, that with respect to 05:00:11
the uniform upward flow that he was describing, he 05:00:14
was describing uniformly a velocity? 05:00:16
MR. THOMAS: Objection; calls for 05:00:19
speculation. 05:00:20
MR. HALPERN: I'm asking what he was 05:00:21
describing in the text here. 05:00:23
MR. THOMAS: I still have my objection. 05:00:24
THE WITNESS: Yeah, he might have been 05:00:26
talking about velocity of the overall flow rates, 05:00:41
you know, to an appliance slot. 05:00:46
I would think that he would be talking 05:00:49
about overall flow rate through an appliance slot 05:00:51

rather than velocity. Velocity is a very tricky 05:00:56
thing because it changes from place to place. It 05:01:02
has different vector component. It has, you know, 05:01:09
X, Y, Z dimensions to it. It's not that 05:01:12
straightforward with velocity. 05:01:18
BY MR. HALPERN: 05:01:19
Q Well, if you were to measure overall flow 05:01:19
rate, how would you do that? 05:01:22
A I would use a flow meter. 05:01:23
Q Okay. Did you use a flow meter to 05:01:28
determine whether any of the accused Rhodium 05:01:31
products had uniform upward flow or substantial 05:01:34
uniform upward flow? 05:01:38
A No, I did not -- I did not have in my 05:01:42
possession a functioning system where I could 05:01:45
instrument it with things like flow meters. 05:01:50
Q Okay. Did you indicate to your lawyers 05:01:53
that you wanted to measure the upward flow using a 05:01:57
flow meter in the Rhodium systems? 05:02:00
A Well, I did not have a need for that 05:02:02
because the claim is talking about uniformly 05:02:06
upwardly flow. That's why we did not, I guess, 05:02:11
assert some other claims which might have required, 05:02:16
you know, what you are saying. 05:02:20
Q If you wanted to determine the direction of 05:02:21

the flow at each point in the tank, how would you -- 05:02:34
how would you do that? If you wanted to show what 05:02:38
the direction of the flow is at each point in the 05:02:42
tank, how would you do that? 05:02:45
A I mean there are many techniques for flow 05:02:49
visualization. There are particle image 05:02:53
velocimetry. There are, you know, Slurren 05:02:57
techniques. You could -- the simplest techniques 05:03:03
may be just injecting some dye in someplace, colored 05:03:06
dye, and see the movement of that, but I don't 05:03:10
understand the relevance of the question. 05:03:14
Q Did you apply any of those techniques for 05:03:16
showing upward flow to the Rhodium tanks to show 05:03:18
that there was upward flow everywhere? 05:03:24
A I think even a child would know that if you 05:03:26
put something at the bottom and it comes out on top, 05:03:29
it's flowing from bottom to top which is called 05:03:33
upwardly. I didn't think I needed to do some -- you 05:03:36
know, use million-dollar equipment to try to prove 05:03:39
something that a child can see. 05:03:42
Q But you did say, I believe earlier, that it 05:03:43
has to be substantially uniformly upwardly? In 05:03:46
other words, that you wouldn't have some downward 05:03:50
flow in some parts of the tank, correct? 05:03:53
A Substantially downward flow, by 05:03:55

"substantial," I mean that the flow is coming in from the bottom and then again some flow is going out from the bottom because it went up and then it came down in some loop in that, right. 05:04:01 05:04:04 05:04:07 05:04:09

If all the fluid is entering the bottom and all the fluid is exiting the top, that's the very definition of it's flowing upwardly. 05:04:13 05:04:15 05:04:19

Q Okay. And I'm asking how would you demonstrate that you don't have any substantial downward flows and you only have -- or substantially only have upward flows? 05:04:22 05:04:25 05:04:28 05:04:31

A Yeah, because if you had substantially downward flow, the law of continuity unless you are destroying matter, right, which is just simply not possible, if the flow is some flow that is going down, where does it go? 05:04:33 05:04:35 05:04:40 05:04:43 05:04:46

It basically has nowhere to go. So it's all of the -- because all the fluid is entering at the bottom and all the fluid is exiting the top, right, it has to be moving upward. 05:04:49 05:04:53 05:04:55 05:04:59

Q How -- did you demonstrate that all of the fluid is exiting the top as opposed to some fluid stagnating in the tank? 05:05:04 05:05:07 05:05:11

A Well, if you have -- 05:05:12

Q Or how would you demonstrate that? 05:05:19

A Yeah, I mean it's called law of continuity. If you have steady flow, then whatever is coming from the bottom, all of that is coming out on top. 05:05:20 05:05:24 05:05:27

Q How would you -- when you say "steady flow," what do you mean? 05:05:31 05:05:34

A Steady flow meaning it's not varying with time. 05:05:35 05:05:40

THE REPORTER: It's not waiting?

THE WITNESS: It's not varying, changing with time.

BY MR. HALPERN: 05:05:41

Q And how would you demonstrate that you have steady flow? 05:05:41 05:05:44

A So the unsteady flow happens right at the beginning when you just switched on your system, for example, you have some liquid coming at the bottom, but it hasn't quite made it all the way to the top. That's an example of flow that is transient, right, because things are changing. 05:05:46 05:05:49 05:05:54 05:05:57 05:05:59 05:06:03

Once the system starts, by definition, all the fluid that is coming from the bottom has to find its way to the top. Like I mentioned, that's, you know, law of conservation of mass or continuity creation. That's one of the first fundamental laws of fluid dynamics. 05:06:04 05:06:07 05:06:10 05:06:14 05:06:18 05:06:21

Q I see, but if I were looking at a tank that had some stagnation in it, how would I -- would I be able to tell just by looking at the tank that there is stagnation of some flow or you'd, like, have to use an equation or some sort of test to show that there is upward flow everywhere? 05:06:22 05:06:25 05:06:29 05:06:32 05:06:36 05:06:41

A Again, it's substantially upward flow, right. There could be -- there, in fact, will be a point where the fluid is not moving at all, and I've mentioned this many times. 05:06:44 05:06:49 05:06:53 05:06:55

Anytime fluid comes in contact with a solid, it will be stagnant at that very point. So that is true about any fluid dynamics. Even if I pulled water out of this cup or this coffee out of this cup, the coffee that is in contact with the cup boundary is stagnant. It is not moving. 05:06:57 05:07:00 05:07:04 05:07:08 05:07:11 05:07:14

It's called no-slip boundary condition in fluid dynamics -- 05:07:18 05:07:23

THE REPORTER: I'm sorry. Slip boundary?

THE WITNESS: No-slip boundary condition in fluid dynamics, right, so -- but that's not what the patent is talking about. It's substantially uniformly upwardly. 05:07:25 05:07:28 05:07:30

It's not saying that it has to be uniformly upwardly at every single point. As long as it is 05:07:32 05:07:36

substantially uniformly upwardly, as we know, it is coming in from the bottom, going out from the top, that -- 05:07:41 05:07:44 05:07:48

BY MR. HALPERN: 05:07:49

Q You could have a tank design where fluid comes in at the bottom and you could see that fluid is injected at the bottom and fluid comes out the top, but there are some tank designs where that could be true, but you would also have substantial downward flow because of something about the design of the tank, right? 05:07:49 05:07:52 05:07:56 05:07:59 05:08:02 05:08:05 05:08:08

MR. THOMAS: Objection; improper hypothetical, lacks foundation. 05:08:08 05:08:11

THE WITNESS: I mean in that hypothetical, if you have fluid coming in and doing like loops, like S kind of turns, serpentine turns through the tank, that is quite possible that you would have -- in that particular design, you would not have substantially upward movement of the -- substantially upwardly movement of the -- of the coolant right. 05:08:12 05:08:13 05:08:16 05:08:20 05:08:22 05:08:25 05:08:31 05:08:35

But in -- in the accused systems, it is not going through some serpentine path, that it's going in one appliance slot and coming down in another slot which is possible. It's possible to have those 05:08:36 05:08:41 05:08:44 05:08:48

designs, but that's not the case -- that's not what 05:08:50
is claimed in these patents, and that's not what is 05:08:54
there in these patents. 05:08:57
BY MR. HALPERN: 05:09:01
Q Okay. But -- so if you removed the plenum 05:09:01
plate, the plate with the holes, would you still 05:09:03
have substantially uniform upward flow? 05:09:06
A Again, in that hypothetical, we'll need to 05:09:09
look at that, like, where the fluid is coming and 05:09:13
how is it going up. 05:09:17
Q Assuming -- yes, assuming the Rhodium tank 05:09:18
is exactly as they are, but you take out the plenum 05:09:20
plate, so you have the fluid coming in where it is, 05:09:23
there's no plate -- there's no orifice -- right, 05:09:26
orifice plate, you know, base plate and otherwise 05:09:28
it's the same. 05:09:34
A So in the Rhodium systems, you have, you 05:09:35
know -- okay, again, in that hypothetical, I would 05:09:45
need to understand where the plenum is, right. I 05:09:48
would still claim plenum is still all the way to 05:09:54
where that plate with the orifice is because below 05:09:58
that, you have a tube that has flow coming out from 05:10:04
the sides. 05:10:06
Q Yes. 05:10:08
A The flow will come out through the sides, 05:10:08

but then within a short distance, it will have to 05:10:11
start moving up because then that's the movement 05:10:16
direction that it can go in, right. It has no way 05:10:20
to go on the sides, on bottom. So by the time, it 05:10:22
hits the -- the volume with -- sorry -- the slots -- 05:10:28
not slots -- like where the appliances are, it will 05:10:38
be moving in substantially upward direction. 05:10:43
Q And would that -- is this computer still 05:10:51
on? 05:10:53
THE VIDEOGRAPHER: No, that's off. 05:10:56
MR. HALPERN: Okay. But they're still 05:10:57
connected? 05:10:58
THE VIDEOGRAPHER: Yes. 05:11:00
MR. HALPERN: Okay. 05:11:00
Q And so in your view, it would still -- 05:11:04
there would still be substantially uniform upward 05:11:06
flow through the appliance slots? 05:11:09
A Again, I would need to study that a little 05:11:11
bit more in detail for that hypothetical, but the 05:11:13
way I understand it, right, all you have done is 05:11:16
removed that plate, and the appliance slots are 05:11:19
where they are because I mean, you know, right now 05:11:21
those -- that plate is where the appliance slots are 05:11:25
sitting, right. 05:11:28
So if you move the plates and the appliance 05:11:29

slots are all the way to the bottom, you know, below 05:11:32
the tube where the coolant is coming in, in that 05:11:34
case, you know, I don't think I would say that it's 05:11:39
substantially -- flowing substantially upwardly. 05:11:42
Q And how would you show -- how would you 05:11:45
show whether it is or isn't, if someone asked you 05:11:48
show me whether this tank has substantially uniform
upward --
THE REPORTER: I'm sorry. If somebody 05:11:53
said? 05:11:53
BY MR. HALPERN:
Q I said how would you show whether it is or 05:11:55
it isn't if someone said tell me whether this tank 05:11:59
has substantial uniform upward flow. 05:12:02
A Right. So in that case, if your fluid is 05:12:05
coming in above where the appliance -- appliances 05:12:10
are located, if the appliances are located below the 05:12:14
entrance for the liquid in the tank, then it may not 05:12:18
be flowing substantially upwardly, at least in that 05:12:22
part of the -- of the appliance that is submerged 05:12:25
below the height of the -- 05:12:30
Q And how would you -- how would you 05:12:33
determine, though, whether it is? 05:12:35
A By looking at it. You can see very easily 05:12:36
what is on top and what is on bottom, what is at 05:12:39

which level. 05:12:42
Q And if the miners were at the same height 05:12:43
that they're at, there was no plate, but there was 05:12:46
just, like, bars that they were sitting on, so the 05:12:48
tank is identical, including the height of the 05:12:51
miners above the inflow pipe, but there's no plenum 05:12:53
plate -- 05:12:57
A Uh-huh. 05:12:57
Q -- would that have substantial uniform 05:12:58
upward flow? 05:13:00
A Again, I would need to look at it a little 05:13:01
bit more, but in that hypothetical, the way I 05:13:04
understand it, you know, the liquid is coming in, 05:13:07
you know, significantly below that level, and by the 05:13:10
time it, you know, rises through the pool of liquid, 05:13:13
it will be moving substantially upwardly. 05:13:17
Q So regarding the term "weir," you applied 05:13:21
the court's construction, correct? And that's at -- 05:14:17
A Paragraph 39. 05:14:40
THE REPORTER: I'm sorry?
BY MR. HALPERN: 05:14:43
Q Paragraph 39? 05:14:43
A 29, 29. 05:14:44
Q Thank you. Yep, okay. "Overflow structure 05:14:45
or barrier that determines the level of liquid," 05:14:50

correct? 05:14:53
A Yes. 05:14:53
Q Okay. So in your understanding of that 05:14:53
phrase, does the structure have to determine the 05:15:10
level of fluid using gravity to qualify as a weir or 05:15:12
may it use suction in addition to gravity? In other 05:15:18
words, if you have an overflow structure or barrier 05:15:23
that determines the level of liquid and it 05:15:26
determines the level of liquid with a combination -- 05:15:30
I'm asking that badly. 05:15:34
You have a structure that determines the 05:15:35
level of liquid, okay, through a combination of 05:15:38
gravity and suction, does that in your understanding 05:15:42
come within an overflow structure or barrier that 05:15:47
determines the level of liquid? 05:15:50
MR. THOMAS: Objection; improper 05:15:52
hypothetical, lacks foundation. 05:15:53
THE WITNESS: I mean I just -- I think that 05:15:55
question is so vague that I just don't know -- I 05:16:00
don't know how will you have an overflow if you have 05:16:03
suction. I just do not understand that. 05:16:06
If you have suction, then you are not 05:16:11
really overflowing. You are just like sucking by -- 05:16:13
overflow by definition means that it's gravity 05:16:17
driven. It's flowing over a barrier and that's what 05:16:22

is determining the level of liquid. 05:16:27
BY MR. HALPERN: 05:16:30
Q Okay. So if there's some contribution of 05:16:30
suction, even if it's mostly gravity, for example, 05:16:33
then, in your view, it's not an overflow structure 05:16:37
or barrier that determines the level of liquid? 05:16:40
MR. THOMAS: Objection; vague and 05:16:43
ambiguous, improper hypothetical. 05:16:44
THE WITNESS: I mean could you define some 05:16:46
suction or like -- I'm not able to see a system 05:16:49
where you have a combination of suction and gravity. 05:16:53
I mean you would need to have a totally 05:16:58
closed system which is not exposed to any air in the 05:17:01
system, and that would then not be a weir. So I 05:17:07
just -- to me, it's -- this hypothetical is kind of 05:17:12
an impossible hypothetical. 05:17:15
BY MR. HALPERN: 05:17:19
Q Well, let's say you have, you know, an 05:17:19
overflow structure, and you also have a pipe that's 05:17:22
performing some suction, both of those things are 05:17:26
determining the level of fluid in the tank, do you 05:17:33
then have an overflow of structure or barrier that 05:17:35
determines the level of liquid? 05:17:41
MR. THOMAS: Again, vague and ambiguous, 05:17:42
improper hypothetical, lacks sufficient facts. 05:17:43

THE WITNESS: So you're saying that in 05:17:46
addition to weir, you have one more system, one more 05:17:47
contraption, another kind of some piping system, 05:17:56
etcetera, that is sucking liquid through the tank, 05:18:00
is that your question? 05:18:12
BY MR. HALPERN: 05:18:14
Q Sure, or if you -- if you constructed your 05:18:14
overflow barrier, your weir, in a way that it also 05:18:17
had some suction holes, for example. 05:18:20
A Well, that's what I'm not really able to 05:18:22
understand, like how can a weir that could be 05:18:25
exposed to air and is an overflow structure also has 05:18:28
a suction or within the same weir. That's the part 05:18:31
that I'm having a really hard time in understanding 05:18:35
in your hypothetical. 05:18:38
Perhaps there was a schematic or something 05:18:41
like that you could provide, I could understand 05:18:44
that. Otherwise, I think you're going to be asking 05:18:45
me about apples and I'm going to be talking about 05:18:48
oranges. 05:18:51
Q I'm just asking this at the simplest level, 05:18:51
whatever the structure may look like, if the level 05:19:02
of liquid is determined both by gravity and by 05:19:04
suction because both are being exerted, is this 05:19:07
limitation present? 05:19:11

MR. THOMAS: Objection. 05:19:12
BY MR. HALPERN:
Q For your understanding, does the weir have 05:19:14
to determine the level of liquid by overflow and if 05:19:17
it's not solely the weir by overflow determining the 05:19:21
level of liquid, then there is no structure or 05:19:25
barrier that determines the level of liquid? 05:19:28
A Well, I mean -- 05:19:33
MR. THOMAS: Objection; confusing, 05:19:34
compound. Can you break that into one question? I 05:19:37
mean that's -- 05:19:40
MR. HALPERN: Yes. 05:19:40
Q Weir is -- you've said a weir is an 05:19:42
overflow structure or barrier that determines the 05:19:44
level of liquid? 05:19:45
A I didn't say that. The court has 05:19:47
considered that. 05:19:49
Q Yes, yes. That's the -- you testified 05:19:49
that's the construction you're applying? 05:19:50
A Right, and that's what I have to apply. 05:19:51
Q Okay. I'm just asking if, in your 05:19:53
understanding, if there is also present in a system 05:19:56
like the Rhodium system, okay, which you believe has 05:20:02
a weir, some element of suction by whatever means 05:20:06
that is contributing to the removal of fluid from 05:20:09

the tank, is there still an overflow structure or barrier that determines the level of liquid? Is that still met? 05:20:12 05:20:17 05:20:19

A I think -- again, I may not having done this analysis completely, the first thing I would say is I will, you know, point you to the first line of the claim, an appliance immersion cooling system comprising, right, so a weir is comprising. 05:20:20 05:20:24 05:20:27 05:20:32 05:20:36

That means there could be something else also there that you could have present there. That doesn't really negate the function of the weir, right. If you're saying you closed all the holes on the weir and you have a suction only that's determining the level, then I could say, yes, that does not have a weir. 05:20:43 05:20:45 05:20:49 05:20:53 05:20:55 05:20:58 05:21:01

But as long as there is a weir, it will define the level of the liquid in that -- in that tank. You can have a lot of other things, you know, the inlet flow rate, you know, the suction from it, that could also change the level of the weir, but the weir, because of the phrase "comprising," right, is allowed to have something else which could, you know, on the margins change your actual level of the -- of fluid there. 05:21:02 05:21:05 05:21:11 05:21:13 05:21:18 05:21:22 05:21:24 05:21:29 05:21:35

Q Okay. I want to direct you to your report 05:21:38

to page 21, paragraph 61. It would be this image, page 21, paragraph 61. There you are. 05:21:41 05:21:58

A Yep. 05:22:00

Q Okay. This is a photo of the R70 tank showing the weir, correct, what you consider to be the weir? 05:22:00 05:22:07 05:22:10

A Yes, it is the weir. 05:22:10

Q Okay. And then on page 46, paragraph 134, there's another photo and that is an R30 tank? 05:22:14 05:22:22

A Yes. 05:22:31

Q And you've got the weir labeled in both of them -- or actually you agree that the drawing in paragraph 61 shows the weir, it isn't labeled and then in paragraph 134, you've actually labeled it. 05:22:31 05:22:35 05:22:40 05:22:44

Do you see that? 05:22:47

A Yes, I do. 05:22:47

Q Okay. So in the -- in both of these weirs, you actually said that your analysis is the same in paragraph 134 for both of the weir limitation. 05:22:48 05:22:58 05:23:01

Is each -- is there any individual hole in the weir, any one hole that is adjacent to all of the appliance slots? 05:23:11 05:23:14 05:23:19

A Sorry. Could you ask the question again? 05:23:23

Q Sure. Is there any one hole in the weir that is adjacent to all of the appliance slots? 05:23:25 05:23:31

A So in this, the -- all the holes together are constituting a weir, and their -- while the hole that is on the individual hole that is on the left of the tank maybe, you know, farther removed from an appliance that is on the right of the tank, right, collectively all those holes is what constitutes a weir, and since it's extending across the entire length, it is adjacent to each of the appliance slots. 05:24:03 05:24:10 05:24:25 05:24:30 05:24:36 05:24:41 05:24:48 05:24:51 05:25:00

Q Right. So I understand your testimony that the weir as a whole, the whole weir, is adjacent to all of the appliance slots, correct? 05:25:00 05:25:02 05:25:06

MR. THOMAS: I just want to object that this is vague by what is meant by "adjacent." 05:25:07 05:25:09

MR. HALPERN: Well, it's in the claim. 05:25:12

MR. THOMAS: I understand. 05:25:13

MR. HALPERN: So I'm asking what he understands. 05:25:13 05:25:15

Q So is that correct, that your testimony is that the entire weir is adjacent to all the appliance slots? 05:25:15 05:25:17 05:25:20

A I wouldn't say entire. The weir is adjacent to the appliance slots, yeah. 05:25:23 05:25:26

Q Okay. I appreciate your answer. I'm asking a different question, a physical question. 05:25:28 05:25:30

A Uh-huh, right. 05:25:34

Q Just pick any hole in the weir, is there any one hole that's adjacent to all of the appliance slots? 05:25:35 05:25:40 05:25:43

A Okay. So in this case, we have not had any interpretation of the phrase "adjacent," but one way for me to interpret adjacent is without having any solid intervening structures in between. 05:25:44 05:25:51 05:25:58 05:26:03

And if I were to apply that definition of adjacency in fluid dynamics, then I would say, again, in that definition of adjacency, I can -- I have no intervening structures from the right side of the slots to the left side of the hole. So in that sense, they could be adjacent because they are all in fluid communication. 05:26:10 05:26:14 05:26:19 05:26:22 05:26:26 05:26:34 05:26:36

Q I see. So is the short end of the tank adjacent to the opposite short end of the tank because they have only fluid between them? 05:26:37 05:26:42 05:26:46

A No, I'm talking about the fluid being adjacent to the weir, not -- 05:26:48 05:26:50

Q No, I just asked the hole. 05:26:51

A I'm not -- yeah, so the hole being adjacent to the fluid that is coming out of the appliance slot, right, so that's the question that you're asking. 05:26:53 05:26:56 05:27:01 05:27:03

Q No, that is not the question that I asked. 05:27:03
I asked if the hole is adjacent to all of the -- if 05:27:05
there's any hole, any one hole, in the weir that is 05:27:10
adjacent to all of the appliance slots? 05:27:14
MR. THOMAS: Objection; improper 05:27:28
hypothetical, lacks foundation. 05:27:35
THE WITNESS: Again, if I look at it from 05:27:36
the point of view of fluid flow, I would say that 05:27:40
they are adjacent because there is no other 05:27:45
intervening structure in between. 05:27:47
BY MR. HALPERN: 05:27:49
Q Okay. So by that standard of adjacent, one 05:27:49
wall at the end of the tank is adjacent to the wall 05:27:54
at the other end of the tank because there's no 05:27:57
structure between them? 05:28:00
A Well, there is -- 05:28:02
Q I'm sorry. In an empty tank? You 05:28:02
haven't -- 05:28:05
MR. THOMAS: Well, you didn't give that as 05:28:05
part of your last hypothetical. 05:28:07
MR. HALPERN: Withdrawn. I'll restate it. 05:28:08
Q So you have an empty tank. Okay. Is 05:28:10
one -- is the wall at one end of the tank adjacent 05:28:12
to the wall at the other end of the tank because 05:28:15
there's only fluid between them? 05:28:18

A I think it depends on context, right. I 05:28:20
mean, again, this is still an incomplete 05:28:22
hypothetical. If you're talking about fluid flow 05:28:24
from one wall to the other wall, I would say that in 05:28:26
that -- if you were talking in that context, from 05:28:29
fluid flow context, these two walls could be 05:28:32
adjacent to each other. 05:28:34
Q Okay. Now, the claim -- by the way, where 05:28:43
do you get that definition of adjacent? 05:28:50
A From a judge, from a judge in one of the 05:28:52
other cases. 05:28:56
Q Do you recall the case? 05:28:56
A I do not recall the case right now, but I 05:28:59
can remember the parties involved. 05:29:02
Q Oh, well, what were -- what were the 05:29:03
parties? 05:29:05
A It was liquid cooling case between Asetek, 05:29:07
A-s-e-t-e-k, versus CoolIT. 05:29:12
Q Okay. That was a claim construction of 05:29:19
adjacent? 05:29:27
A I mean it's -- now I'm going back like 05:29:28
20- -- it was either in 2014 or 2019. There were 05:29:31
two instances of that lawsuit. I don't quite 05:29:34
remember exactly at what point in time the, you 05:29:38
know, claim construction term had come up, but it 05:29:41

was one of those hearings where the judge had 05:29:44
defined -- given the construction of edges and fluid 05:29:48
dynamics to mean without having intervening solid 05:29:54
structures in between. 05:29:57
Q Each hole has a lip, right, in your view, 05:30:03
an overflow lip? 05:30:06
A That's right. The way -- in the accused 05:30:10
instrumentalities, each hole has a lip. 05:30:14
Q Does the entire structure have a lip in 05:30:18
your view? 05:30:22
MR. THOMAS: Objection; vague as to what 05:30:23
structure. 05:30:24
MR. HALPERN: I'm asking about the Rhodium 05:30:24
accused -- the structure he accuses of being a weir 05:30:26
with an overflow lip. 05:30:31
Q So does each -- I'm sorry. 05:30:34
Does the entire structure have an overflow 05:30:36
lip in your view? 05:30:39
A So I would consider the bottom half of the 05:30:44
weir where the fluid is coming in contact with those 05:30:51
circular structures in -- in the 70 and 30 tanks, I 05:30:55
would consider all of that length put together is 05:31:02
constituting the lip of the weir. 05:31:07
Q So does that include the portions between 05:31:13
the holes as part of the overflow lip? 05:31:18

A No, I do not believe so. 05:31:24
Q Okay. So then it's -- it is not a 05:31:26
contiguous lip. There's a separate lip in each 05:31:30
hole, but you consider them, even though they're 05:31:34
discontinuous, to be one overflow lip structure of 05:31:36
the weir? 05:31:41
MR. THOMAS: Objection; improper 05:31:41
hypothetical, lacks foundation. 05:31:43
THE WITNESS: I would -- there are, I 05:31:46
think, two ways I have done the analysis, and the 05:31:50
literal, as well as doctrine of equivalents, if I 05:31:58
recall correctly, yes, and I think my conclusion is 05:32:04
that in both of those cases, the lip is what I just 05:32:11
described earlier. 05:32:20
BY MR. HALPERN: 05:32:21
Q Okay. By the way, you're aware that 05:32:21
Rhodium designed and built its own tank and did not 05:32:32
buy the tanks from a company that sells immersion 05:32:36
cooling tanks, correct? 05:32:40
A I've been made aware of that. 05:32:41
Q Okay. And so did you consider in your 05:32:44
opinions about noninfringing substitutes whether 05:32:58
Rhodium -- designs that Rhodium could adopt that 05:33:01
would be different by simply changing its own tanks 05:33:06
as opposed to buying from some vendor, for example, 05:33:11

putting the weir at the short end of the tank instead of the long wall of the tank? 05:33:14 05:33:17

A Sorry. So your question is that they could have done it? 05:33:19 05:33:21

Q Well, I'm asking did you consider modifications that Rhodium could make as a possible category of noninfringing substitutes instead of buying tanks from a third party. 05:33:22 05:33:24 05:33:28 05:33:32

MR. THOMAS: Objection; improper hypothetical, lacks foundation. 05:33:37 05:33:38

THE WITNESS: Did I look at every single possible way that they could skirt this patent and, you know, probably no, right. There are multiple ways of solving a problem. Not all of them may be equally efficient. 05:33:43 05:33:46 05:33:48 05:33:54 05:33:57

I think the system that this patent describes is a particularly efficient way of ensuring uniform cooling to all the miners, and that's the reason that they opted the design they adopted. 05:33:58 05:34:02 05:34:04 05:34:10 05:34:13

BY MR. HALPERN: 05:34:14

Q Did you look at any -- did you consider any alternatives that Rhodium could have pursued by modifying its own tanks? 05:34:14 05:34:17 05:34:20

A I mean they could have used air cooling 05:34:24

maybe. I don't know, right. It's not as efficient, but, you know, there are options that exist. But in my opinion, this was the most optimum solution that Rhodium could have used so, you know, while it is possible to design around, it will not be as efficient as the system that this patent describes. 05:34:30 05:34:32 05:34:34 05:34:44 05:34:49 05:34:51

Q Did you consider any particular design-arounds that Rhodium might attempt? 05:34:55 05:34:58

A I mean I thought of them, but I kind concluded that they are not as efficient, and I think that it does not make sense to use less optimal ways of solving a problem when you already have an optimal way of solving a problem. 05:35:00 05:35:03 05:35:06 05:35:11 05:35:14

Q So did you consider -- I mean the claims require the weir to be integrated into the long wall of the tank, correct? 05:35:17 05:35:20 05:35:23

A Yes. 05:35:24

Q Okay. Did you consider whether Rhodium could avoid the design by integrating -- having the same weir -- what you consider to be a weir in the short wall of the tank? 05:35:24 05:35:27 05:35:30 05:35:33

A I think it will not be particularly -- it will not be as efficient simply because these tanks that I saw were fairly long. 05:35:36 05:35:42 05:35:46

So their, you know, aspect ratio was high. 05:35:49

They had, you know -- while there were only two in one dimension, there were like 14 in the other dimension in one of the tanks, which had 28 miners. 05:35:53 05:35:58 05:36:01

So if you have to take the coolant and, you know, take it with all the heat that is coming from one side and bring it to the other side, it will by definition have overheating of the miners that are on the far end. 05:36:06 05:36:09 05:36:12 05:36:15 05:36:19

Q Well, you could have it on both short walls, but not on a long wall, right? 05:36:21 05:36:23

A You could make a really -- you know, immersion tank where you only have one miner each and have a square wall, right, that's possible, but it's not really efficient because you want to, you know, use the space in an optimal manner. 05:36:26 05:36:31 05:36:34 05:36:36 05:36:38

So, yeah, I think -- like I said, right, there are design-arounds that are always possible, but the question is: Are they as efficient as the design that they currently have, right, and there is no motivation in -- typically in existence to go to, say, a less efficient system when a more efficient system exists. 05:36:41 05:36:44 05:36:48 05:36:51 05:36:53 05:37:00 05:37:02

Q Did you perform an analysis of whether such a substitute would be acceptable, even if it was less efficient in your view? 05:37:02 05:37:04 05:37:10

A Acceptable in what sense? 05:37:10

Q An acceptable substitute that would be, you know, even if somewhat less efficient, far less expensive than licensing the patent, did you perform that analysis? 05:37:12 05:37:15 05:37:18 05:37:21

A I did not perform any economic analysis here -- 05:37:22 05:37:25

Q Or even a technological analysis of what would be the -- you know, the performance of that tank compared to the tank they're using? 05:37:25 05:37:28 05:37:33

A Well, I -- you know, it -- like I said, there are -- there are other solutions like, you know, they are actually taking air-cooled miners and putting them in immersion. 05:37:37 05:37:41 05:37:46 05:37:49

They could just use the air cooling and, you know, vast majority of miners are using air cooling, but certainly, you know, Rhodium saw a benefit of, you know, taking a system that was designed for air cooling and removing things from it and then placing it in the tanks to -- to cool it using immersion cooling. 05:37:51 05:37:53 05:37:56 05:37:59 05:38:04 05:38:07 05:38:12

There clearly is a benefit associated with that, and that's where higher hash rate and so forth. So they determined that the cost of building these systems is still outweighing the additional, 05:38:13 05:38:16 05:38:19 05:38:23

you know, the Bitcoins, they could mine. So, you know, I just believe this is an optimal solution and there is no technical reason to go to less optimal solution. 05:38:27 05:38:32 05:38:36 05:38:42

Q Well, could they have applied this exact tank with no appliance slots where you just have holes everywhere and you arrange the -- you can -- there's no guide, there's no indication of where to put the miners, and you can put the miners in any way you like? 05:38:42 05:38:47 05:38:49 05:38:53 05:38:56 05:38:59

A Yeah, so -- 05:39:00

MR. THOMAS: Objection; improper hypothetical, lacks foundation. 05:39:01 05:39:02

You can answer. 05:39:04

THE WITNESS: First of all, I think I have said that I am not providing an analysis sitting here whether there are -- there will still be reading on the claim or not of this patent, right. Maybe there is -- you know, in that hypothetical, maybe there is some other claim that becomes relevant. I haven't performed that analysis, right. 05:39:05 05:39:09 05:39:12 05:39:16 05:39:20 05:39:24 05:39:26

BY MR. HALPERN: 05:39:29

Q Well, but I'm asking about the claims that are asserted? 05:39:29 05:39:30

A Right.

Q We're only in the world of the asserted claims. The other claims are not part of anybody's analysis. 05:39:32 05:39:34 05:39:37

A Okay. Yeah, so I mean, again, I have not performed that analysis, but if you're saying that that was an acceptable substitute, right, still then you are reducing the number of miners that you can place in the tank because you're not placing them uniformly and you're placing them haphazardly and randomly. So it will reduce the efficacy of the system and the output from the system so -- 05:39:37 05:39:41 05:39:43 05:39:49 05:39:55 05:39:58 05:40:02 05:40:07

Q So in your view, if you have a continuous grid on the plenum plate of holes with no guide to where to put miners, okay, and you fit as many miners onto that plate as possible, okay, there are slots simply because you have put the miners into maximum capacity? 05:40:09 05:40:12 05:40:16 05:40:21 05:40:28 05:40:31

A Again, in that hypothetical, based on if I understood you correctly, my analysis would be, yes, there are slots in there. 05:40:34 05:40:37 05:40:43

Q So does a bookshelf have slots? 05:40:52

MR. THOMAS: Objection; vague, ambiguous, improper hypothetical. 05:40:56 05:40:58

BY MR. HALPERN: 05:40:59

Q In your understanding of slots, does a 05:40:59

bookshelf -- bookcase, bookshelf have slots? 05:41:01

A Right. You can certainly slot books in a bookshelf, right, whether it has predetermined slot to place only one book at a time, you know, that would be sort of a unique bookcase. 05:41:10 05:41:13 05:41:16 05:41:23

Q Right. I'm asking if you have a typical bookcase, right, where there's no markings, there's no dividers, there's just an open shelf, and you could fit, you know, ten books of a certain size or if you had a smaller book, you could maybe fit 20. 05:41:25 05:41:27 05:41:29 05:41:32 05:41:35

With that bookshelf, you're looking at that open bookshelf, you have all different kinds of books, does that bookshelf have slots for books in your understanding -- 05:41:39 05:41:41 05:41:44 05:41:46

MR. THOMAS: Objection; improper hypothetical, lacks foundation. 05:41:46 05:41:48

THE WITNESS: I mean, again, not talking about the patents in question here, right, I would say that that bookshelf has -- does not have slots. You just have location to place the books in. 05:41:50 05:41:53 05:41:55 05:42:00

BY MR. HALPERN: 05:42:11

Q Okay. All right. But in any case that -- that alternative that I just described, which I know you're not agreeing necessarily that it's an alternative of having just the grid, right, the 05:42:11 05:42:12 05:42:15 05:42:17

homogenous grid of holes where you could -- there's no indication of where you should put tanks -- I'm sorry -- where you should put miners, that is not an alternative that you considered as a possibility not infringing the substitute or you performed an analysis of? 05:42:22 05:42:25 05:42:27 05:42:30 05:42:34 05:42:37

A Yes, I have not performed an analysis of, you know, whatever hypothetical that you are talking about because I don't even understand the hypothetical. So I, by definition, could not have done it. 05:42:38 05:42:41 05:42:43 05:42:45 05:42:49

Q But you didn't perform an analysis of any modifications -- 05:42:49 05:42:51

A Right. 05:42:53

Q -- that Rhodium could make to its tank to make them noninfringing? You only considered commercially available systems, correct? 05:42:53 05:42:57 05:43:01

A That is right. 05:43:03

Q Okay. All right. I don't know if we're ready for another break -- 05:43:03 05:43:09

MR. THOMAS: Just keep going. 05:43:10

MR. HALPERN: Let's take a five-minute break because I want to see where I am. 05:43:13 05:43:14

THE VIDEOGRAPHER: Going off the record, the time is approximately 5:43 p.m. 05:43:16 05:43:18

(Recess taken.) 05:43:20
THE VIDEOGRAPHER: Going back on the 05:52:51
record, the time is 5:52 p.m. 05:52:53
BY MR. HALPERN: 05:53:04
Q All right. Do you know what kinds of 05:53:04
sensors are used to measure the temperature of a 05:53:08
liquid? 05:53:11
MR. THOMAS: Objection; vague as to what 05:53:18
kind of liquid you're -- 05:53:20
THE WITNESS: You could use thermocouples. 05:53:23
You could use thermistors, also use diodes. That's, 05:53:25
you know, the most typical ones. 05:53:36
BY MR. HALPERN: 05:53:37
Q What about RTDs? 05:53:37
A You could use RTDs, yes. 05:53:39
Q Do those types of sensors, thermocouples, 05:53:42
thermistors, diodes, and RTDs require that the 05:53:47
sensor be immersed in the fluid in order to measure 05:53:51
the temperature? 05:53:57
A Depends, not necessarily. You can place it 05:53:59
on the wall sometimes to measure the temperature of 05:54:02
the fluid. Depends on what kind of temperature 05:54:09
exists between what you're trying to measure and 05:54:13
where you have the sensor. 05:54:16
Q I am confused. How could you measure the 05:54:19
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temperature in a fluid by putting one of those 05:54:32
sensors on the wall? 05:54:37
A The fluid is in contact with the wall 05:54:39
presumably. 05:54:43
Q Okay. So you're saying like you have the 05:54:44
temperature -- the fluid is in the tank, and you are 05:54:45
putting the sensor on the outside wall of the tank 05:54:55
and measuring the fluid temperature that way? 05:54:58
A Yeah. 05:55:01
Q And why would you do that? In what sort of 05:55:03
system would you want to do that? 05:55:10
A You know, it depends, right. I mean maybe 05:55:11
I have fluid that is a reacting fluid that is 05:55:14
reacting with -- you know, it's an acid that reacts 05:55:17
with most of the things, right. 05:55:20
So maybe if you try to get the sensor in 05:55:24
the fluid stream, you will need a contraption that's 05:55:27
an additional cost. I mean you also have some 05:55:32
leakage points, right. 05:55:35
So if in the system, I'm not expecting 05:55:37
significant or substantial difference between the 05:55:40
wall versus the fluid, right, which will be the case 05:55:46
if the wall conductivity is reasonable, it's made 05:55:50
out of metal, for example, I could measure within 05:55:54
the accuracy of some of these sensors the 05:56:02
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temperature of the fluid. 05:56:04
Q Yeah. So I -- you sort of alluded to what 05:56:05
I was going to next ask you, which is you'd be 05:56:09
measuring the temperature of the wall, right, if you 05:56:13
put the sensor on the wall? 05:56:15
A Uh-huh. 05:56:17
Q Is that correct? 05:56:18
A Yeah. I mean it will be the wall 05:56:18
temperature and that would -- wall would be at the 05:56:20
same temperature as the fluid. If there is no -- I 05:56:25
mean the temperature difference in thermal 05:56:28
conduction exists because of the conductivity and 05:56:31
the thickness and the heat that is being transferred 05:56:35
through that. 05:56:39
Q Right. 05:56:39
A If the heat transfer is low, the wall 05:56:41
temperature will be very close to the fluid 05:56:44
temperature. 05:56:48
If the conductivity is high, the wall 05:56:48
temperature will be very close to fluid temperature. 05:56:51
If the thickness is very low, the fluid temperature 05:56:55
will be very close to -- the wall temperature will 05:56:59
be very close to fluid temperature. 05:57:00
So, again, it's dependent on a few 05:57:03
different things. You know, in this particular 05:57:06
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case, I think the wall is made out of metal -- thin 05:57:07
metal and there is no heat being transferred there. 05:57:12
So all the conditions are met for it to pretty 05:57:16
accurately assess the temperature of the fluid. 05:57:20
Q So you're describing a hypothetical where 05:57:24
you have a thin wall, high conductivity, and low 05:57:26
heat transfer because of the particular material 05:57:36
that the wall is made of, if all of those conditions 05:57:39
are met, you could put the sensor on the wall and 05:57:41
know that it was very close to the fluid 05:57:44
temperature? 05:57:46
A That's not hypothetical. That's pretty, 05:57:47
you know, similar to the conditions that we have in 05:57:49
our systems also where we have no heat being 05:57:53
transferred to the outside of the wall other than 05:57:56
natural circulation and radiation which is extremely 05:57:59
small. You have very thin wall like -- 05:58:03
Q Who's the "we"? 05:58:06
A The tanks in this case, for example. The 05:58:07
tanks are made out of metal which are reasonably 05:58:14
high in thermal conductivity. So it's not a 05:58:17
hypothetical situation like you characterized it, 05:58:20
right. 05:58:23
All I'm saying is that your question was a 05:58:24
general question, right, you know, how would you 05:58:26
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measure the temperature of the fluid, and there are multiple ways. It just depends and, you know, unfortunately in engineering, it doesn't work like law where it is -- 05:58:28 05:58:31 05:58:34 05:58:40

THE REPORTER: I'm sorry. Unfortunately?

THE WITNESS: In engineering, it doesn't work like law that it is this or it is not this. It's dependent on the situation that you are trying to do, and you've got to weigh the accuracy against the cost and complexity of doing certain things. 05:58:41 05:58:43 05:58:45 05:58:49

BY MR. HALPERN: 05:58:51

Q But in order to know what the temperature of the fluid is using the sensor outside on the wall of the tank, you would have to know several variables, right? You'd have to know how thick the wall is. You'd have to know it's heat transfer properties, and so on. 05:58:51 05:58:53 05:58:57 05:59:02 05:59:05 05:59:08

So you'd have to have some sort of equation that you would apply to convert the wall temperature to the temperature in the tank? 05:59:10 05:59:13 05:59:15

A Not necessarily, right. A lot of these sensors have errors that are much more than the errors that you will get because of not placing the sensor in the fluid, right. 05:59:16 05:59:18 05:59:22 05:59:25

If your error on a thermocouple is 05:59:28

plus/minus one degree and the temperature difference between the liquid inside temperature and the wall temperature is .1 degree, there is no point in trying to calculate it out and then lose all of that and then some in the measurement accuracy or inaccuracy of your sensor itself. 05:59:31 05:59:35 05:59:38 05:59:39 05:59:44 05:59:48

Q Does Rhodium have any sensors that you observed attached to the outside wall of its tank, heat sensors? 05:59:50 05:59:52 05:59:55

A No, I did not observe anything like that. 05:59:56

Q Okay. And does Rhodium have any heat sensors immersed of the -- you know, you mentioned the kinds that you could use to measure the temperature of a liquid, thermocouples, thermistors, diodes, and RTDs, does Rhodium have any sensors of those types immersed -- any of those types immersed in the fluids in its tank? 05:59:58 06:00:00 06:00:04 06:00:06 06:00:10 06:00:13 06:00:14

A In its fluids, yes, not inside the tank. 06:00:16

Q Okay. But, right, yeah, okay. I understand your answer. 06:00:20 06:00:24

All right. Now, have you heard of chip junction temperature? 06:00:27 06:00:30

A Yes. 06:00:31

Q Okay. And how is that measured? 06:00:31

A Mostly using thermal diodes that might 06:00:33

exist on the chip. 06:00:39

Q And they tend to be built into the chip, right? 06:00:40 06:00:43

A That's right. 06:00:43

Q Okay. Is a forward bias diode another name for that kind of diode? 06:00:44 06:00:54

A Yeah, those are -- thermal diodes are typically forward bias. 06:00:57 06:01:01

Q Okay. And that measures the temperature of the silicone? 06:01:01 06:01:04

A That -- you know, even within silicone there is a huge temperature variation. I, you know, spent seven years in Intel where we were, you know, I would say blazing the trail in terms of adopting the diodes on the -- on the CPUs and you need to put it in exactly where the hotspot is because even within the chip, the temperature might be reading by 20 degrees, 30 degrees celsius, right. 06:01:04 06:01:07 06:01:10 06:01:15 06:01:19 06:01:25 06:01:28 06:01:32

So there is, you know -- so if you just say chip temperature, right, it's the hotspot of the chip where those diodes should be located. 06:01:34 06:01:36 06:01:40

Q So if there is 20 to 30 degrees celsius variation within the chip, then obviously there is a large variation between the hotspot in the chip and the temperature of the fluid outside? 06:01:42 06:01:48 06:01:51 06:01:54

A There could be, yes. 06:01:55

Q And so can thermocouples or thermistors or -- not diodes because that's a broad category, but the kinds of sensors that are used to measure fluid temperature, can those be used to measure chip temperature? 06:02:03 06:02:09 06:02:12 06:02:16 06:02:20

A You can place a thermocouple on the chip to measure the, you know, chip case temperature. It's called -- you know, for the chip, there are, you know, practitioners who use a lot of different terms for chip temperature. There is junction temperature. There is case temperature. You know, for measuring the case temperature, typically we use thermocouples. 06:02:21 06:02:27 06:02:34 06:02:37 06:02:40 06:02:42 06:02:44 06:02:48

Q But you can't measure the junction temperature with those kind of sensors that are used for fluid temperature measurements, correct? 06:02:49 06:02:51 06:02:54

A Yeah, that's -- I'm not aware of a technique for -- 06:02:57 06:02:59

Q Because they're too big? 06:03:00

A You know, the hotspot for that is, you know, in silicone and micron sized and like you said, there are -- some of these sensors are -- you cannot reach there, and if you reach there, then you cannot have interconnection on the chip towards -- 06:03:01 06:03:06 06:03:11 06:03:13 06:03:15

THE REPORTER: I'm sorry. You cannot have?
THE WITNESS: Interconnection on the chip function. So, you know, in trying to measure the temperature, you will render the chip unoperational.
BY MR. HALPERN:
Q Okay. And obviously the silicone in the chip junction is not in contact with the dielectric fluid?
A Yeah, it is not.
Q Okay. So in the Rhodium systems where you observed sensors, they're on certain pipes, correct?
A That's right.
Q Okay. And those pipes are, if I recall, the only places where the sensors are and we've already -- I've asked you about sensors that are not connected or whatever, but leaving that issue aside, the sensors are on pipes that are inflows to -- and outflows from the dry cooler, correct?
A That's correct.
Q Okay. Are there any -- I don't recall there being any other temperature sensors on any pipes but --
A I think in terms of pipes, those are correct and other temperature sensors are on the board in the miners themselves that are measuring --

also measuring temperatures.
Q On the?
A Board.
Q Board, okay. But those are also chip junction temperatures?
A No, no, no, no, it's the board -- it's environmental temperature that exists on M30s. So M30s have an environmental temperature, you know, sensor that measures -- it's on the board, and it measures the temperature of what it is immersed in.
Q And where do you speak about that in your report?
A I think I say that it's PCB. If you look at my report, it talks about PCBs.
Q Okay.
A You know, the PCB temperature sensor is measuring the fluid temperature.
Q Okay. But you describe the PCB temperature as correlated to the temperature of the dielectric fluid in the tank, correct?
A Yeah, it's like very, very -- like, that's how the miners measure the temperature of the environment that they are in, by measuring the temperature of the PCB.
So, like, you know -- I mean, again, like,

you know, in academic sense, you can say, well, everything is down by like .0001 degrees celsius --
THE REPORTER: I'm sorry. Everything is down by what?
THE WITNESS: Everything like is different, things might be different by like 0.0001 degrees celsius, but that's immaterial. It's immeasurable, right. It's correlated, meaning it's actually there to measure the temperature of the environment that it is in.
BY MR. HALPERN:
Q Do you know how much heat is dissipated by a miner chip in watts?
A Which miner chip, the chip you are talking about? Now, there are a lot of different chips. Like, I personally worked on a lot of miners that are at 3 volts. There are miner chips that are at 13 volts, and people are trying to go up all the time.
Q I see.
A So there is a range.
Q Okay. So if you knew the wattage and the coolant temperature, would you be able to figure out the chip temperature?

A Sorry. Wattage and the coolant temperature?
Q Yes.
A Along with that, you will need quantity called thermal resistance. If you have that value, then you can calculate out the chip temperature.
Q Okay. Now, is it your understanding that the temperature readings that are taken -- well, first of all, let me ask -- well, is it your understanding that temperature readings taken from the chip are used to determine when to reboot the chip or -- reboot and restart the chip and run it at a lower wattage?
A I would -- I would think so. As a person of ordinary skill in the art, I would think that if the chip is overheating in a given situation, you would want to put lesser power in there so that it stops overheating.
Q But I'm asking, is it your understanding that that is actually how Rhodium's system operates?
A At least based on their public disclosures in their S-1, it seems like they are monitoring the temperatures of the chips and ensuring that it doesn't overheat.
Q Okay. And are they using the chip junction

temperature to do -- perform that function? 06:09:37
A Yeah. I mean in the end, really the most 06:09:42
critical thing is chip junction temperature, but 06:09:44
they are also measuring the temperature of the 06:09:47
environment that it is in, and they may have a more 06:09:51
complex regard where they take into account the chip 06:09:55
as well as, you know, some other things. 06:09:59
Also, the chip -- the ASIC is not the only 06:10:02
electronic component on the board. There are other 06:10:05
things also that might fail. So they do not have a 06:10:08
thermal diode or a thermal sensor on every single 06:10:12
component that exists on the board. That's why they 06:10:16
also measure the board temperature, the T -- the 06:10:19
ENV_temp and environmental temperature as they call 06:10:24
it -- as you know, M30 calls it. 06:10:30
So they measure that also. They might be 06:10:33
using that also internal to the miner to ensure 06:10:36
field safe operation. 06:10:41
Q Is it your understanding that they use the 06:10:42
PCB temperature to determine whether to turn off a 06:10:44
miner? 06:10:49
A So there is a specified temperature range 06:10:49
for the miner. Each miner enters these specs and 06:10:55
says that it should be within the -- I forget the 06:10:59
exact numbers, but low temperature to high 06:11:02

temperature. This is the range in which you can 06:11:04
operate them. 06:11:07
So I suppose that it's rated to work only 06:11:07
in that environmental temperature and the fact that 06:11:12
they are measuring the temperature of the 06:11:14
environment that it is in, they might be using that 06:11:16
information to shut it down, but I don't know it for 06:11:20
a fact. 06:11:22
Q Okay. So you -- you -- just so I clearly 06:11:23
understand what you're testifying to, it is your 06:11:29
understanding that they use the chip junction 06:11:33
temperature to determine whether to shut off a 06:11:35
miner; you don't know whether they use the PCB 06:11:39
temperature to shut off a miner -- 06:11:42
A The chip temperature, right, I have never 06:11:44
really worked inside the company that makes M30. So 06:11:48
I have no access to their strategies on managing 06:11:51
their products, right. 06:11:56
So all I'm saying is from the point of view 06:11:58
of a person of ordinary skill in the art, if I have 06:12:01
specified the limits of components on my system, and 06:12:05
I have taken the efforts to put sensors, to measure 06:12:10
temperature of the chip and temperature of the 06:12:14
environment and both of them have some limitations, 06:12:17
I would be providing some field safe mechanism to 06:12:21

make sure that if that chip temperature goes over 06:12:25
its junction temperature, it shuts down and if the 06:12:28
environmental temperature goes over its specified 06:12:32
temperature, you reduce the performance or shut it 06:12:34
down, depending on whatever controls that you might 06:12:38
want to follow. 06:12:41
Q What evidence would you need to know 06:12:42
whether either of those temperatures is being used? 06:12:45
Would you need to look at the source code or -- 06:12:56
A You may need to look at the source code, 06:12:57
right. There could be other ways of looking at it. 06:13:00
I have currently not thought about that. 06:13:02
Q Okay. Now, with regard to the pipes that 06:13:04
are -- the other sensors, I asked you about that are 06:13:25
on the pipes, either just before the entrance to or 06:13:30
just outside the exit from the dry cooler, there are 06:13:34
sensors like that in both the Rock -- in your view, 06:13:44
in both the Rockdale and Temple facilities, correct? 06:13:47
A That's right. 06:13:53
Q Okay. I think for Rockdale, it might only 06:13:56
be at the exit from the dry cooler, and for Temple, 06:13:58
they were -- but regardless, okay -- well, first of 06:14:01
all, is the dielectric fluid temperature the same 06:14:09
throughout an R70 or an R30 immersion tank or do you 06:14:13
have a complex temperature field? 06:14:19

A You're adding heat in the system. So the 06:14:21
dielectric liquid warms up as it goes towards -- 06:14:27
from the plenum towards the rear. 06:14:31
Q And do you have any idea what the 06:14:32
temperature difference is? 06:14:35
A I think it probably -- I don't remember 06:14:39
this number exactly. I did, I believe, ask them, 06:14:42
but I did not note it down, but it might be like 20 06:14:47
or 30 degrees at most over ambient. The dielectric 06:14:52
liquid was warming up maybe 20 degrees C over 06:14:59
ambient. 06:15:03
Q Okay. So the range is -- in other words, 06:15:03
some of it is at ambient temperature like the -- 06:15:04
where would it be at ambient temperature, the 06:15:08
temperature of the room? 06:15:12
A Close to ambient temperature so the -- 06:15:13
Q At the bottom? 06:15:14
A Yes. 06:15:15
Q Okay. Okay. And then at the top, it's 06:15:16
something like 20 degrees higher? 06:15:20
A Yeah, again, this is just going back in 06:15:22
memory and, you know, it's of that order, I would 06:15:26
say. 06:15:30
Q So when the claims refer to using the 06:15:30
temperature of the dielectric fluid in the tank, 06:15:34

what part of the tank -- 06:15:37
A Yeah, I mean -- 06:15:38
Q -- does that refer to? 06:15:39
A I don't think they are limiting themselves, 06:15:40
right. It just depends on what your control 06:15:44
strategy is, right. You could -- you know, it's all 06:15:47
about like, you know, if the hot fluid gets to a 06:15:51
certain temperature, you might want to do certain 06:15:54
things. 06:15:56
I mean you can always relate the 06:15:56
temperatures of the fluid to something that you are 06:16:00
interested in controlling which is, you know, 06:16:05
Bitcoin mining activity in this case. 06:16:08
Q Okay. Now, that point in the pipes that's 06:16:12
just before or just after -- just outside the dry 06:16:17
cooler is -- in both facilities is quite far away, 06:16:20
right, because the dry coolers are in another 06:16:25
building? 06:16:27
A Uh-huh, yes. 06:16:28
Q Do you recall how far -- I walked it, too, 06:16:28
and it seemed like it's a hundred yards at least? 06:16:32
A Okay. 06:16:36
Q I'm asking if your -- 06:16:37
A It could be, right. I mean I don't know 06:16:38
what relevance it has. 06:16:41

Q Okay. But you watched and you saw where 06:16:42
the tanks were and then the long pipes into the 06:16:45
other room and they go up to the ceiling -- 06:16:48
A That's right. 06:16:49
Q -- and there's also a chiller that they 06:16:50
pass through on the way out, at least in Rockdale, 06:16:54
to the dry coolers, like all the pipes feed into a 06:16:58
chiller and then go outside. 06:17:01
Do you recall that? 06:17:03
A I don't recall it exactly but might be. 06:17:06
Q Okay. So obviously the temperature of the 06:17:12
fluid at that point where those sensors are is going 06:17:27
to be quite different from the temperature in the 06:17:30
tank, correct? 06:17:33
A No. 06:17:34
Q The fluid has traveled a hundred yards or 06:17:36
whatever, it's gone through piping, it's gone 06:17:40
through another device? 06:17:43
A So? 06:17:44
Q Your testimony is the temperature will be 06:17:45
identical at that point a hundred yards away through 06:17:48
all that piping and intervening machinery to the 06:17:51
temperature in the tank? 06:17:54
A I don't understand what distance has to do 06:17:55
with temperature, right. You're talking about two 06:17:57

physical quantities here. 06:17:59
Q Okay. Well, I mean as the fluid flows 06:18:00
through the pipes, it's going to lose heat to the 06:18:05
pipes, right, based on the heat transfer properties, 06:18:10
the heat coefficient of the substance that the pipe 06:18:15
is made of, the length that it is traveling, right, 06:18:17
it's passing through a chiller, and then it's going 06:18:21
into and out of the dry cooler whose entire purpose 06:18:24
is to reject heat? 06:18:28
A Okay. 06:18:31
Q So, therefore, wouldn't the temperature at 06:18:32
the sensors that are far away from the tank be 06:18:37
different from the temperature in the tank? 06:18:39
A Okay. Let's -- 06:18:42
Q I'm not asking -- I'm not saying that 06:18:43
there's no relationship. I'm just asking about the 06:18:45
absolute temperatures are two different numbers, 06:18:48
correct? 06:18:50
A It may be immeasurably different. They may 06:18:50
be different, but they'll be immeasurably different, 06:18:56
not using like a standard thermocouple unless you're 06:19:00
using some, you know, very fancy equipment or try to 06:19:04
do like third decimal digit, I do not believe that 06:19:07
the temperatures are going to be substantially 06:19:10
different. 06:19:12

Q And so how is it that the temperature, you 06:19:13
know, of a fluid that's gone through all of the 06:19:20
different stages, I mean, you know, for example, in 06:19:23
the winter, right, there's heat loss from the pipes 06:19:27
because it's cold outside? 06:19:30
A Okay. Right. 06:19:32
Q So there's going to be some difference in 06:19:33
the temperature at a minimum because of that, right? 06:19:36
A Well, you know, wrong analogy. Here, you 06:19:38
should look at how much -- let's look at how many 06:19:42
watts you are cooling, right. You are cooling in 06:19:48
one of those coolers two megawatt, for example, in 06:19:51
Kelvion and in Guntner, you are cooling maybe around 06:19:57
1.5 megawatt of thermal power. Okay. Megawatt is 06:20:01
million watts. 06:20:08
Okay. So in the pipe that you have going 06:20:12
up to it, that's how much energy is going in. What 06:20:14
you are losing from the pipes, in my estimate, is at 06:20:20
most in kilowatt range. Kilowatt is also very 06:20:24
generous just based on the heat transfer 06:20:33
coefficient, the area, as well as the PVC, not 06:20:35
highly conductive pipe that I saw there, that heat 06:20:37
leakage is on the order of -- 06:20:44
THE REPORTER: I'm sorry. That what?
THE WITNESS: The heat leakage is on the

order of kilowatt. So you have something that is 06:20:50
megawatt scale and you remove the kilowatt from it, 06:20:51
the difference it makes is .001 in terms of cooling. 06:20:54
I mean in the end, if it was so easy to 06:21:03
cool this -- this dielectric liquid, you could just 06:21:06
have some pipe and let it come back into the system. 06:21:12
Why did they install that big huge dry cooler -- or 06:21:14
dielectric cooler which is consuming a lot of 06:21:20
energy? That's what it makes to remove heat from 06:21:24
this dielectric liquid because there is so much heat 06:21:29
there. 06:21:32
So a small amount of heat leakage is not 06:21:32
going to amount to anything, at least in terms of 06:21:34
engineering sense. I mean in terms of a critical 06:21:38
academic --
THE REPORTER: Sorry. What?
THE WITNESS: Critical academic number, I
mean, yeah, it could be -- it would be slightly 06:21:47
different, but it will not be measurably different. 06:21:51
BY MR. HALPERN: 06:21:54
Q And there's an equation that you could use, 06:21:54
right, to determine from the heat of the fluid in 06:21:58
the tank what the heat would be at that point, for 06:22:01
example? 06:22:04
A I already told you that equation. It's 06:22:04

kilowatts of loss on megawatts of energy that is 06:22:07
transferring there. The temperature differences are 06:22:13
going to be the second or third decimal digit of 06:22:15
Fahrenheit, which is not measurable using any of the 06:22:20
standard measuring techniques that we talked about. 06:22:23
The headers on those will be more than the cooling 06:22:27
you will have going in the pipes. 06:22:30
Q Well, you told me what you thought the 06:22:32
difference would be, but I'm just asking, what 06:22:34
was -- if you wanted to calculate that difference, 06:22:37
there is an equation that you could use, correct? 06:22:39
A Yeah, you could use -- 06:22:41
Q The coefficient, the length of the pipe? 06:22:43
A You could make an estimate on the area. 06:22:44
You could transfer coefficient -- 06:22:46
Q Okay. Yes. 06:22:48
A -- and the temperature difference between 06:22:48
the pipe and the air around it. 06:22:50
Q All right. Did you perform that 06:22:54
calculation in your report? 06:22:57
A Yeah, I estimated -- not in my report 06:23:00
because it's, again -- it's kind of -- the order of 06:23:01
magnitude, right, so I mean, you know, I'm not -- 06:23:08
I'm a practicing engineer, and I believe in using 06:23:13
the, you know, order of magnitude analysis rather 06:23:21

than trying to do some critical meaningless 06:23:25
calculations. 06:23:28
Q Do you talk about this order of magnitude 06:23:30
analysis in your report? 06:23:33
A I think it's -- you know, I think I have 06:23:34
said that this temperature is same. I'm saying 06:23:38
that, look, I mean the tank temperature is -- the 06:23:43
temperature of the fluid in the tank is being 06:23:48
measured is what I'm saying by measuring it at the 06:23:51
point of the dry cooler, right. 06:23:56
So I mean contained I think therein is my 06:23:59
tacit kind of agreement that this is -- there is an 06:24:05
insubstantial difference in those two temperatures. 06:24:16
Q But you're not saying that about the 06:24:18
temperature after the dry cooler, right, that would 06:24:20
be applied -- what you've just said would apply to 06:24:24
the temperature entering the dry cooler, but not the 06:24:26
temperature exiting the dry cooler? 06:24:29
A Temperature exiting the dry cooler is going 06:24:32
to be very close to ambient, okay, and that's going 06:24:34
to have even less temperature difference between 06:24:37
that and air temperature. 06:24:41
So it will reject even less heat. So 06:24:43
even -- it will be even more closely associated with 06:24:46
temperature of the liquid that is entering the tank. 06:24:50

Q I see. 06:24:56
A Everything is very close to ambient. So 06:25:02
there is like, you know, no way for it to lose much 06:25:04
heat, and if you're not removing much heat, then you 06:25:07
are, you know, going to have the same temperature 06:25:12
that is coming out of the adiabatic cooler into the 06:25:14
tank.
THE REPORTER: What kind of cooler?
THE WITNESS: Adiabatic, a-d-i-a-b-a-t-i-c. 06:25:22
BY MR. HALPERN: 06:25:25
Q Now, you say at -- in your report that the 06:25:25
fan speed at the dry coolers is adjusted in response 06:25:51
to the temperature of the input and output fluid? 06:25:57
A Yes. 06:26:02
Q That's in -- I can direct you to the 06:26:02
paragraphs, you recall it's in 96 and 121? 06:26:04
A Uh-huh. 06:26:16
Q And you don't cite any evidence for that, 06:26:16
and I am wondering what your basis is. 06:26:21
A I recall we -- when I visited the facility, 06:26:26
I forget the names of the people that we met and 06:26:31
spoke to, one of the things I learned there was that 06:26:34
the adiabatic coolers were -- the fan speed was 06:26:39
being changed based on, you know, whether it's -- 06:26:43
you know, they were saying in summer versus winter 06:26:47

or so forth, again, because those fans take a lot of 06:26:51
energy and, you know, in Bitcoin mining, everything 06:26:54
is about energy consumption. So if you don't use -- 06:26:57
need to use so much energy, you will reduce the fan. 06:27:00
The other thing that I saw was they were 06:27:03
driven by variable frequency drives, VFDs, and VFDs 06:27:07
typically are configured for changing the speed of 06:27:13
the -- of the fans or the motors, right, and that I 06:27:15
have personal experience with, I use it in my 06:27:17
systems. 06:27:19
Q Did you cite the people that you say said 06:27:22
this to you? 06:27:25
A I don't even remember the names, right. We 06:27:25
have a bunch of different people that we were 06:27:29
talking. It might also be there in some of their 06:27:31
documentations that I, again, don't remember it. 06:27:35
Q Part of the reason I'm asking you this 06:27:37
question is that the testimony was that the -- of 06:27:40
Chase Blackmon was that the coolers are running at 06:27:43
maximum all the time except that when it gets cold, 06:27:46
they manually turn them off, but there isn't 06:27:49
variable control -- 06:27:52
A Okay. 06:27:53
Q -- or automated control, and you didn't 06:27:53
cite to anything, and now you're saying you spoke to 06:27:56

people? 06:27:58
A Yeah, I mean that's what my recollection is 06:27:59
that, you know, seeing the VFDs and talking to 06:28:00
people, what I walked away from there was that they 06:28:04
are modulating the speed of the motors. 06:28:07
Q Okay. 06:28:10
A I mean that's kind of what my recollection 06:28:12
is. 06:28:14
Q I see. And you saw -- your recollection -- 06:28:16
well, did you mention these VFDs? I'm not even sure 06:28:21
you mentioned those in your report controlling the 06:28:24
dry coolers. 06:28:27
A Yeah, I don't believe I have mentioned it. 06:28:28
Q Okay. All right. Yeah, I just did a quick 06:28:30
search. I didn't see it. 06:28:35
A I guess that's the point of these sessions, 06:28:39
right, to kind of get out things that I might have 06:28:43
missed. 06:28:46
Q So do you have a basis to -- well, I guess 06:28:46
you've just testified to it. In other words, you 06:28:53
know, I mentioned to you that Mr. Blackmon testified 06:28:55
to what he testified to, and do you have a basis to 06:29:03
doubt his testimony? 06:29:07
A No, I don't have any basis to doubt his 06:29:08
testimony. More than that, I would doubt my memory 06:29:10

okay -- 06:29:13
Q Okay. 06:29:13
A -- because he knows this better than I do. 06:29:14
Q Okay. Now, in your report, you say at 06:29:17
section 101 that the dielectric fluid's purpose is 06:29:56
to cool the miners to ensure the miners are running 06:30:15
at optimal efficiency. 06:30:18
So is it fair to say that the temperature 06:30:27
of the miners is the temperature we really care 06:30:30
about in the system in light of that statement? 06:30:34
A Again, the M30s that are being used here 06:30:37
also specify the environmental temperature. So, you 06:30:42
know, I think they do care for the chip temperature, 06:30:48
but they also care for PCB temperature because 06:30:51
that's why they have, you know, specification around 06:30:55
it, and that's why they have the sensors around it. 06:30:57
Q But the -- I'm just -- I mean I -- I am 06:31:00
simply quoting you to yourself, right, the 06:31:13
dielectric fluid has this purpose of cooling the 06:31:16
miners to make assure they're running at optimal 06:31:20
efficiency. 06:31:24
Is turning off the miners to -- and then 06:31:25
rebooting them and running them at a lower wattage a 06:31:36
different method of controlling the level of heat in 06:31:43
the system than cooling the miners with dielectric 06:31:47

fluid? 06:31:51
MR. THOMAS: Objection; vague -- vague and 06:31:51
ambiguous as to "different method." 06:31:56
THE WITNESS: Sorry. Your question is? 06:32:07
BY MR. HALPERN: 06:32:08
Q Simply, you know, cooling the miners with 06:32:08
dielectric fluid is one way of lowering their 06:32:15
temperature and improving their efficiency, right? 06:32:18
A Yeah.
Q Okay. Turning the miners off and rebooting 06:32:24
them is a different way of cooling the miners? 06:32:27
A That's not cooling. That's providing less 06:32:30
heat input. You're not changing the cooling with 06:32:32
that. You are actually -- you know, you are -- you 06:32:34
know, you are providing less heat in there, right. 06:32:41
The cooling might be a second order effect, 06:32:43
you know, because of the natural circulation being 06:32:47
different and all of that because of that, but 06:32:50
primarily you are changing the heat input and 06:32:52
secondarily you are changing the cooling. 06:32:55
Q Okay. So in other words, it's even more 06:32:57
different than I was suggesting, it's a totally 06:32:59
different function? 06:33:02
A Function in what sense? 06:33:06
Q In other words, you're trying -- you're 06:33:08

trying to get heat out of the system, right, so that 06:33:11
the miners will run efficiently. One way to do that 06:33:13
is to use dielectric fluid and to increase the flow 06:33:17
of the dielectric fluid, right? 06:33:22
A Uh-huh, uh-huh. 06:33:26
Q And another way is to turn off the miners 06:33:27
and restart them, run at a lower wattage? 06:33:30
A If you turn them off and don't start them 06:33:33
at all, they will be the coolest. 06:33:36
Q Right.
A That's true, right, nothing to laugh about. 06:33:38
It's true. It's true. 06:33:40
Q I mean are you saying that changing the 06:33:41
power of the miners is not a method of controlling 06:33:44
the cooling system? 06:33:48
A No, I did not say that. I did say that, in 06:33:49
fact, the heat from the miner also impact on a 06:33:56
second order the natural circulation or the heat 06:34:01
driven flow through the miners itself. 06:34:07
So it does impact the cooling a little bit, 06:34:11
but fundamentally you are changing the power in the 06:34:17
miner. That will help them -- help you keep it 06:34:19
cool. 06:34:23
Q Okay. And that is a different method of 06:34:24
keeping it cool than increasing the flow of the 06:34:26

dielectric fluid? 06:34:35
A Yeah, or reducing the temperature of the 06:34:35
dielectric fluid coming in, it could be any idea of 06:34:37
things. So I don't understand on this hypothetical 06:34:41
where we are going, if you could help me with your 06:34:43
question. 06:34:45
Q I mean it's just -- ultimately the goal of 06:34:48
the system is to -- as you said, the dielectric 06:35:09
fluid's purpose is to cool the miners to ensure the 06:35:12
miners are running at optimal efficiency. 06:35:16
So if you're doing that, for example, by 06:35:18
turning off the miners and rebooting them at lower 06:35:20
power when they overheat and that works for you, 06:35:23
then you don't care about the temperature of the 06:35:26
dielectric fluid because that temperature is -- its 06:35:29
purpose -- the purpose of using it is to cool the 06:35:35
miners. 06:35:38
So in the instance where you are directly 06:35:39
managing the miners, you're not -- you don't care 06:35:44
about the indirect method of management which is the 06:35:48
cooling? 06:35:51
MR. THOMAS: Objection; improper 06:35:51
hypothetical, insufficient facts. 06:35:52
THE WITNESS: Look, at the end of the day 06:35:57
here, the purpose is to run the miners at full 06:35:59

capacity to mine as many Bitcoins as possible, 06:36:03
right. 06:36:06
In your hypothetical, at the extreme, you 06:36:06
can switch them off, and everybody will be -- will 06:36:08
be fine from cooling perspective, but you have spent 06:36:12
all of this money to have no output, right, 06:36:14
everything is cooled. 06:36:19
BY MR. HALPERN: 06:36:19
Q You're changing my hypothetical. I was 06:36:19
asking about turning them off and restarting them -- 06:36:22
A I'm saying that -- 06:36:24
MR. THOMAS: Let him answer the question. 06:36:25
THE WITNESS: I'm saying that maybe the low 06:36:26
is so low that it is really not doing any meaningful 06:36:28
work, right. I mean the lower could mean 06:36:33
anything -- 06:36:38
THE REPORTER: I'm sorry. The law?
THE WITNESS: Lower could mean anything,
you know. So like in the limit, it is switching 06:36:40
them off and, you know, everything is cool. 06:36:44
BY MR. HALPERN: 06:36:46
Q But are you aware that the Restful API 06:36:46
turns off the miners, right, when they hit a certain 06:36:54
temperature and restarts them at a lower power? 06:36:59
A Yes, but the lower power also means lower 06:37:10

output from those miners -- 06:37:14
Q Right, but as a matter of actual fact, that 06:37:15
is what the Restful API is doing, correct? 06:37:18
A I don't recall exactly all the 06:37:22
functionalities. I mean if you are representing to 06:37:26
me, I would have no reason not to believe that it is 06:37:28
doing that as one of the things it does. 06:37:30
Q In paragraph 100 of your report, you say, 06:37:32
"Rhodium developed a software 'Restful' to directly 06:37:35
communicate with each individual miner and globally 06:37:38
report that data to a dashboard." 06:37:42
"The Restful API gives Rhodium the 06:37:44
capability" --
THE REPORTER: Restful API gives Rhodium?
BY MR. HALPERN:
Q -- "to observe and directly control the 06:37:49
miners by commanding the miner to reboot and consume 06:37:49
less wattage when the miners become too hot." 06:37:53
A Yeah, thank you for pointing that out, 06:37:56
please. 06:37:58
Q So I'm just asking that is a different -- 06:37:58
A Right. 06:38:00
Q -- method of managing the miner's heat than 06:38:01
is using dielectric fluid to cool them, correct? 06:38:05
A Yeah, I mean you are directly changing the 06:38:12

heat that you are putting in. So if you're reducing 06:38:13
the heat that you're putting in, then you're 06:38:16
managing the heat. 06:38:19
Q And have you seen any evidence that the -- 06:38:20
the accused Rhodium systems are controlling the flow 06:38:35
rate of the coolant in order to manage the heat put 06:38:41
out by the miners? 06:38:47
A I mean I don't believe that is required 06:38:51
from the claim 1 perspective, but I -- to the best 06:38:54
of my knowledge, their pumps are single-speed pumps 06:39:01
and it's not changing the speed for the primary 06:39:06
circulation facility. 06:39:09
Q Okay. And then I already asked you about 06:39:10
the secondary circulation facility -- 06:39:17
A Okay. 06:39:19
Q -- right? The -- the -- yeah, okay. 06:39:21
By the way, does the patent anywhere teach 06:39:45
varying the power to the servers or talk about that 06:39:49
as part of the invention or, you know, part of the 06:39:53
system of temperature management? 06:39:58
MR. THOMAS: As it relates to the control 06:40:08
system? 06:40:10
MR. HALPERN: Yeah. 06:40:15
THE WITNESS: I think the patent mostly is 06:40:15
talking about server CPUs, and server CPUs typically 06:40:18

have a self-toggling mechanism. You don't need an 06:40:23
external kind of thing to tell it based on my 06:40:27
knowledge of, you know, the processors. If it 06:40:29
starts to get too hot, that's true about your laptop 06:40:33
processor, it will start toggling it down. It will 06:40:37
start reducing its heat output. 06:40:39
So it might already be, you know, implicit 06:40:42
in the way, you know, this patent is talking about 06:40:44
the server that are doing it implicitly built in. 06:40:48
BY MR. HALPERN: 06:40:55
Q Okay. So is it -- is it true that that is 06:40:55
a long-standing feature? In other words, that's 06:41:04
been known for a long time since before the patent 06:41:07
that processors will reduce their heat output when 06:41:10
they overheat? 06:41:15
A Yeah, that's a known method of controlling 06:41:17
the temperature of the processors because they have 06:41:23
to account for things like, you know, you have a 06:41:26
processor running full tilt and certainly the 06:41:29
cooling system, your fan goes bad, you want to make 06:41:32
sure the processor doesn't start smoking. 06:41:35
Q Now, there's some more Boyd testimony. All 06:41:38
right. Why don't I just give it to you. 06:41:47
How much time is left on the record? 06:41:50
A What time is it? 06:41:56

MR. THOMAS: 6:41. 06:41:57
THE VIDEOGRAPHER: About five minutes. 06:41:59
MR. HALPERN: Oh, okay. 06:42:00
MR. THOMAS: I had four, but it's -- sorry. 06:42:02
I'm counting. 06:42:06
MR. HALPERN: Not that anyone's counting. 06:42:07
Okay. 06:42:09
So this is Exhibit 10. Is that what we're 06:42:10
up to? 06:42:18
THE REPORTER: Uh-huh. 06:42:19
THE WITNESS: Yeah. 06:42:20
MR. HALPERN: Okay. I marked that one for 06:42:20
you. 06:42:21
THE WITNESS: Okay. Thank you. 06:42:22
MR. HALPERN: Just because my brain is
fried, and I wasn't -- my routine was disrupted.
(The document referred to was marked by the
Reporter as Pokharna Exhibit 10 for identification
and is attached hereto.)
BY MR. HALPERN: 06:42:24
Q So this is -- once again, I've given you 06:42:24
the transcript of -- part of the transcript of Chris 06:42:38
Boyd. It's a massive transcript. So that's why 06:42:42
I've just pulled these excerpts to keep it 06:42:45
manageable. 06:42:47

And we want 126 so -- actually -- sorry -- 06:42:50
125, starting at 18, I asked, "Would it have been 06:43:16
better to have a system that would turn the cooling 06:43:26
system on and off based on the temperature of the 06:43:28
servers themselves rather than of the dielectric 06:43:31
fluid in the tank?" 06:43:33
And then Mr. Boyd explained that it was 06:43:35
cheaper and easier to put the sensors in the coolant 06:43:38
and directly measuring the server temperature would 06:43:42
have been more expensive and would have required 06:43:45
software that was beyond his ability to write. 06:43:46
So I -- just to save you time, I'm telling 06:43:49
you that's the gist, but please examine it for 06:43:53
yourself. 06:43:56
A Uh-huh. 06:43:58
Q And do you have any reason not to credit 06:43:58
that testimony? 06:44:02
A Again, I'm missing the context and, you 06:44:03
know, where you are going with it, but I'm -- you're 06:44:09
reading from a witness's testimony, and I have no 06:44:11
reason to believe that he was lying, right. So he 06:44:13
was telling the truth, I would believe it. 06:44:17
Q In other words, the inventor -- the point 06:44:19
is simply that the inventor said it was a cheaper 06:44:21
and easier method to put the sensors in the fluid. 06:44:25

It would have been expensive and difficult and required additional software to measure the temperature of the servers, and that was a different way of doing it that he did not undertake for those reasons. 06:44:28 06:44:30 06:44:32 06:44:36 06:44:40

Does that seem sound? 06:44:41

A That's what he said, yeah. 06:44:43

Q Okay. But I'm asking if that seems reasonable. Do you find that believable? Do you have reason to doubt it? 06:44:44 06:44:46 06:44:49

A No, I have no reason -- 06:44:50

MR. THOMAS: I just want to object. I believe you're mischaracterizing what he said. I know you're trying to go fast and summarize, but I don't believe you accurately summarized it. 06:44:51 06:44:54 06:44:56 06:44:59

MR. HALPERN: Okay. Do you want to just give it a quick read, this is probably the end, and just tell me if you -- 06:45:01 06:45:02 06:45:05

MR. THOMAS: I'm going to just object. You're only -- this is a several-hundred page transcript. You're giving him out of context a couple sheets here. I don't know that he can -- and I think we're out of time. 06:45:06 06:45:09 06:45:11 06:45:14 06:45:20

THE WITNESS: No, sorry. So your question is simply that you are asking for my opinion or 06:45:22 06:45:25

you're asking for -- 06:45:29

BY MR. HALPERN: 06:45:30

Q Yeah. In other words, as a person of skill reading this description of why he chose one method over the other, do you find that believable, does it make sense, or do you have reason to doubt that it would have been, for example, so much harder to use the temperature of the servers instead of the temperature of the fluid? 06:45:30 06:45:33 06:45:35 06:45:38 06:45:40 06:45:43 06:45:45

A Different people have different skills. You know, the -- for somebody, they are aware of the way the software interface works with the server. They could have reached in there and measured temperatures that way. That might be easier for some people. 06:45:47 06:45:50 06:45:58 06:46:03 06:46:06 06:46:10

I mean for Mr. Boyd, he said it was easier for him to measure fluid temperature and somehow correlate with that the temperature of the servers, then he chose that method. Like I mentioned many times in this testimony, there are different ways of solving a problem, and different people can come up with slightly different solutions. 06:46:11 06:46:15 06:46:20 06:46:23 06:46:25 06:46:28 06:46:30

MR. HALPERN: Okay. Are we -- 06:46:31

THE VIDEOGRAPHER: This concludes today's testimony given by Dr. Himanshu Pokharna on 06:46:36 06:46:38

February 6, 2024. The original video media will be retained by Veritext, and we are going off the record at approximately 6:46 p.m. 06:46:42 06:46:47 06:46:49

(Discussion held off the videographic record.)

THE REPORTER: Do you want a copy of the transcript? 06:48:10 06:48:11

MR. THOMAS: Yes, we do. 06:48:12

(Whereupon, at the hour of 6:46 p.m., the deposition was concluded.)

STATE OF CALIFORNIA)
) ss
COUNTY OF ORANGE)

I, HIMANSHU POKHARNA, Ph.D., declare under the penalties of perjury of the laws of the United States that the foregoing is true and correct.

Executed this _____ day of _____, 2024, at _____, California.

_____
HIMANSHU POKHARNA, Ph.D.

STATE OF CALIFORNIA)
) ss
COUNTY OF ORANGE)

I, LINDA NICKERSON, CSR #8746, in and for the State of California do hereby certify:

That, prior to being examined, the witness named in the foregoing deposition was by me duly sworn to testify the truth, the whole truth, and nothing but the truth;

That said deposition was taken down by me in shorthand at the time and place therein named, and thereafter reduced to typewritten form at my direction, and the same is a true, correct, and complete transcript of the testimony at said proceedings.

Before completion of the deposition, review of transcript [X] was [ ] was not requested. If requested, any changes made by the deponent (and provided to the reporter) during the period allowed are appended hereto.

I further certify that I am not interested in the event of the action.

WITNESS MY HAND this 9th day of February, 2024.

LINDA NICKERSON, CSR No. 8746

JOSEPH E. THOMAS, ESQ.
jthomas@twtlaw.com

FEBRUARY 8, 2024

RE: MIDAS GREEN TECHNOLOGIES V. RHODIUM ENTERPRISES
FEBRUARY 6, 2024, HIMANSHU POKHARNA, Ph.D., JOB NO. 6442786

The above-referenced transcript has been completed by Veritext Legal Solutions and review of the transcript is being handled as follows:

__ Per CA State Code (CCP 2025.520 (a)-(e)) – Contact Veritext to schedule a time to review the original transcript at a Veritext office.

__ Per CA State Code (CCP 2025.520 (a)-(e)) – Locked .PDF Transcript - The witness should review the transcript and make any necessary corrections on the errata pages included below, notating the page and line number of the corrections. The witness should then sign and date the errata and penalty of perjury pages and return the completed pages to all appearing counsel within the period of time determined at the deposition or provided by the Code of Civil Procedure.

__ Waiving the CA Code of Civil Procedure per Stipulation of Counsel - Original transcript to be released for signature as determined at the deposition.

__ Signature Waived – Reading & Signature was waived at the time of the deposition.

_X_ Federal R&S Requested (FRCP 30(e)(1)(B)) – Locked .PDF Transcript - The witness should review the transcript and make any necessary corrections on the errata pages included below, notating the page and line number of the corrections. The witness should then sign and date the errata and penalty of perjury pages and return the completed pages to all appearing counsel within the period of time determined at the deposition or provided by the Federal Rules.

__ Federal R&S Not Requested - Reading & Signature was not requested before the completion of the deposition.

MIDAS GREEN TECHNOLOGIES V. RHODIUM ENTERPRISES
HIMANSHU POKHARNA, Ph.D. (#6442786)

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.

EXHIBIT 1007

Docket #1641 Date Filed: 09/12/2025

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

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

DECLARATION OF CHARLES R. TOPPING IN SUPPORT OF DEBTORS' MOTION FOR SANCTIONS RELATING TO CLAIM NUMBERS 004, 062, AND 068-072 FILED BY MIDAS GREEN TECHNOLOGIES LLC (ECF NO. 1602) AS DIRECTED BY THE COURT'S SEPTEMBER 5, 2025 SCHEDULING ORDER (ECF NO. 1609)

I, Charles R. Topping, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am General Counsel and Secretary of Rhodium Enterprises, Inc., which directly or indirectly manages other Rhodium-family entities, including but not limited to Rhodium Renewables LLC, Rhodium 30MW LLC, Rhodium JV LLC; Rhodium 2.0 LLC, Rhodium 10MW LLC, Rhodium Encore LLC, Jordan HPC LLC, and Air HPC LLC (collectively referred to as "Rhodium" herein). Except for any matters stated to be based upon information and belief, I have either personal knowledge of the facts set forth below or knowledge based on my review of records kept and maintained by Rhodium in the ordinary course of its business, and if called as a witness, I could and would competently attest to them.

[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. From the inception of the case filed by Midas Green Technologies, LLC in district court in 2022 purporting to accuse Rhodium of patent infringement (*Midas Green Technologies, LLC v. Rhodium Enterprises, Inc. et al.*, Case No. 6:2022-CV-00050-ADA (W.D. Tex. 2022)) through July of 2023, Rhodium paid no less than $2.5 million in fees to its prior patent litigation counsel at Kirkland & Ellis and $81,778.87 in costs.

3. From May of 2023 through July of 2024, Rhodium paid an additional $2,596,065.00 in fees to Stris & Maher LLP ("Stris") for litigating the case to victory in district court and an additional $320,376.00 in costs.

4. From November 2024 to August 31, 2025, Rhodium incurred the following additional amounts to address the Midas Green claims asserted in these Chapter 11 proceedings:

a. Fees to Stris (reflected and billed in Exhibits A-L and one forthcoming invoice for August services): $527,975.79;

b. Costs (reflected and billed in Exhibits A-L and one forthcoming invoice for August services): $6,103.43; and

c. Fees to Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn Emanuel") (reflected in the fee submissions submitted by Quinn Emanuel and summarized in Exhibit M): $137,059.50.

5. On information and belief, I am informed and believe that to date in September, Rhodium has incurred approximately $65,500.00 in fees and costs to Stris and Quinn Emanuel and $19,350 in expert and other costs.

6. On information and belief, I am informed and believe that Rhodium will incur additional fees between $235,000.00 and $300,000.00 to Stris and Quinn Emanuel and between an additional $22,000.00 and $35,000.00 in expert and other costs to address the Midas Green claims in these proceedings leading up to the September 23, 2025, hearing. Rhodium will request the opportunity to supplement its damages claim based upon these actual additional fees and costs once they are incurred.

7. The fees Rhodium paid to Kirkland & Ellis and Stris in connection with the Midas Green district court litigation were discounted, and it is my opinion that the fees paid to Kirkland & Ellis and Stris to litigate the Midas Green claims in district court have been reasonable, and the fees paid to Stris and Quinn Emanuel to litigate the Midas Green claim in these chapter 11 proceedings have been reasonable.

8. As reflected above and in the exhibits and without taking into account any supplementation that may be permitted, Rhodium has incurred at least $5,498,220.00 in damages due to Midas Green's pursuit of its baseless claim in district court and an additional no less than $755,988.72 in damages due to its continued pursuit of the baseless claim in these proceedings, for a total to-date of $6,254,208.72.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: September 12, 2025

Respectfully submitted,

/s/ Charles R. Topping
Charles R. Topping

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

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

STRIS & MAHER LLP'S FIRST MONTHLY FEE STATEMENT FOR THE PERIOD AUGUST 26, 2024, THROUGH SEPTEMBER 30, 2024

Stris & Maher LLP ("Stris & Maher") submits, pursuant to the Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the "Interim Compensation Order") (ECF No. 264) entered on October 14, 2024, this monthly fee statement for the payment of interim compensation rendered and reimbursement of expenses incurred during the period August 26, 2024 through September 30, 2024 (the "First Monthly Fee Statement").[2]

Stris & Maher seeks payment of interim compensation in the total amount of $1,021,415.40 (80% of the services rendered), plus $44,263.50 (100% of the interim expenses

[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), 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.

[2] *See* Interim Compensation Order, ECF No. 264 at n.3 ("For the avoidance of doubt, [Stris & Maher LLP] may file and serve . . . a combined Monthly Statement for the months of August 2024 and September 2024"). Stris & Maher received partial payment for its August services from Debtors in August. This Monthly Statement seeks payment only for the unpaid portion of Stris & Maher's fees and expenses in August incurred after the Petition Date.

incurred). *See* Interim Compensation Order at ¶ 1(a). Summaries of the fees and expenses are attached as Exhibits 1, 2, and 3. Invoices reflecting detailed time entries are attached hereto as Exhibit 4.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall serve within 14 days after delivery of the First Monthly Fee Statement a written notice, via email, upon Stris & Maher and each of the other Fee Notice Parties (as listed below) (the "Written Notice"). The Written Notice shall set forth with reasonable detail the nature of the objection and the amount at issue. If the parties are unable to reach a resolution of the objection within 14 calendar days, the objecting party shall file its objection (the "Objection") with this Court within 3 business days and serve such Objection on Stris & Maher and each of the other Fee Notice Parties. See Interim Compensation Order ¶ 1(c).

The Fee Notice Parties as defined in the Interim Compensation Order are:

a. Rhodium Enterprises, Inc., Attn: Charles Topping (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 2617 Bissonnet Street, Suite 234, Houston, Texas 77005;

b. Debtors' Bankruptcy Counsel, c/o Quinn Emanuel Urquhart & Sullivan, LLP, Attn: Patricia B. Tomasco (pattytomasco@quinnemanuel.com); Razmig Izakelian (razmigizakelian@quinnemanuel.com), Alain Jaquet (alainjaquet@quinnemanuel.com), and Joanna D. Caytas (joannacaytas@quinnemanuel.com), 700 Louisiana, Suite 3900, Houston, Texas 77002;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (mrobinson@provincefirm.com); David Dunn (ddunn@provincefirm.com); Kirsten Lee (klee@province.com); and Andrew Popescu (apopescu@provincefirm.com), 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074;

d. Galaxy Digital, LLC, in its capacity as DIP Agent, c/o Orrick, Herrington & Sutcliffe LLP, Ryan C. Wooten (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke

(mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 51 West 52nd Street, New York, New York 10019;

e. Counsel or proposed counsel to any statutory committee appointed in these Chapter 11 Cases; and

f. United States Trustee, Ha Minh Nguyen (ha.nguyen@usdoj.gov), 515 Rusk, Suite 3516, Houston, Texas 77002.

If no objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Stris & Maher an amount equal to 80% of the fees (after applying, for the Tarrant County Litigation, a 10% discount) and 100% of the expenses listed herein, or if an objection is timely served, such percentage of fees and expenses that are not subject to an objection, as stated in the Interim Compensation Order.

Respectfully submitted this 6th day of November, 2024.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

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Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on November 6, 2024, a true and correct copy of the foregoing Monthly Fee Statement was served through the Court's Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco
Patricia B. Tomasco

EXHIBIT 1
Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	1.4	$1,515.00	$1,212.00
002	Temple Green Data Matter	28.6	$22,490.00	$17,992.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	1860.5	$1,182,372.50	$945,898.00
006	Tarrant County Litigation	32.2	$23,226.75[3]	$18,581.40
007	Retention and Fee Applications	54.1	$47,165.00	$37,732.00
Total		1976.8	$1,276,769.25	$1,021,415.40

[3] Stris & Maher has agreed to provide a 10% discount in the Tarrant County Litigation, resulting in a discount from $25,807.50 to $23,226.75 for the period August 26, 2024 through September 30, 2024. *See* Order Granting Application for Order Authorizing the Retention and Employment of Stris & Maher LLP as Special Litigation Counsel, ECF No. 252 at ¶ 2. This discount is reflected in the accompanying text.

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,100.00	0.9	$990.00
Bridget Asay	Partner	1997	$1,050.00	0.5	$525.00

Temple Green Data Matter

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Victor O'Connell	Partner	2012	$875.00	11.7	$10,237.50
Colleen Smith	Associate	2015	$725.00	16.9	$12,252.50

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Peter K. Stris	Founding Partner	2001	$1,250.00	21.1	$26,375.00
Elizabeth Brannen	Managing Partner	2001	$1,100.00	26.3	28,930.00
Bridget Asay	Partner	1997	$1,050.00	124.2	$130,410.00
Victor O'Connell	Partner	2012	$875.00	24.5	$21,437.50
John Stokes	Partner	2016	$875.00	255.4	$223,475.00
Colleen Smith	Associate	2015	$725.00	104.9	$76,052.50
Peter Brody	Associate	2016	$725.00	171.9	$124,627.50
Sarah Rahimi	Associate	2019	$650.00	104.3	$67,795.00
Helen Marsh	Associate	2024	$600.00	157.4	$94,440.00
Tanya Tice	Discovery Associate	1989	$480.00	29.4	$14,112.00
Michele Jarrouj	Discovery Associate	2021	$480.00	27.7	$13,296.00
Pascale Nyby	Discovery Associate	2009	$480.00	146	$70,080.00
Venu Alagh	Discovery Associate	2003	$480.00	156.5	$75,120.00
Holly Sadlon	Discovery Associate	1994	$480.00	126.1	$60,528.00
Fatima Fofana	Discovery Associate	2012	$480.00	177.8	$85,344.00
Monica Viramontes	Senior Paralegal	N/A	$400.00	41	$16,400.00
Andrea Atsalis	Litigation Fellow	N/A	$325.00	25.4	$8,255.00
Cynthia Huang	Litigation Fellow	N/A	$325.00	88.5	$28,762.50
Jaida Hodge-Adams	Litigation Fellow	N/A	$325.00	52.1	$16,932.50

Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate[4]	Total Hours	Total Compensation
Bridget Asay	Partner	1997	$945.00	7.7	$8,085.00
John Stokes	Partner	2016	$787.50	16.8	$14,700.00
Sarah Rahimi	Associate	2019	$585.00	1.6	$1,040.00
Jaida Hodge-Adams	Litigation Fellow	N/A	$292.50	6.1	$1,982.50

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Peter K. Stris	Founding Partner	2001	$1,250.00	9.2	$11,500.00
Elizabeth Brannen	Managing Partner	2001	$1,100.00	1.7	$1,870.00
Victor O'Connell	Partner	2012	$875.00	13.7	$11,987.50
John Stokes	Partner	2016	$875.00	2.8	$2,450.00
Colleen Smith	Associate	2015	$725.00	19.2	$13,920.00
Peter Brody	Associate	2016	$725.00	7.5	$5,437.50

[4] Stris & Maher has agreed to provide a 10% discount in the Tarrant County Litigation, which is reflected as a rate discount in this column. *See* Order Granting Application for Order Authorizing the Retention and Employment of Stris & Maher LLP as Special Litigation Counsel, ECF No. 252 at ¶ 2.

EXHIBIT 3
Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
JND eDiscovery hosting	$7,530.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
StoneTurn professional services	$12,637.50
Logikcull eDiscovery hosting	$2,646.00
Peregrine Consultants, LLC professional services	$21,450.00
Total	$36,773.50

EXHIBIT 4

Stris

November 1, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14247
Client # 00346
Matter # 002

INVOICE SUMMARY

For professional services rendered through August 31, 2024

RE: Temple Green Data Litigation

Total Professional Services	$ 7,190.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 7,190.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14247 November 1, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
8/29/24	VO	Confer with CS regarding preparation of letter responding to Second Notice of Default (0.1); correspond with Rhodium personnel including [redacted] regarding new correspondence from M. Simmons raising various issues (0.2); prepare draft response to M. Simmons regarding same (1.4); correspond with CS regarding revisions to same (0.2).	1.90	875.00	1,662.50
8/29/24	CS	Review and analyze letter from Landlord regarding alleged second breach of lease (0.4); review and analyze correspondence from Rhodium personnel regarding allegations (0.3); draft portions of response letter (2.1); review and edit draft email response to M. Simmons regarding other outstanding items (0.3).	3.10	725.00	2,247.50
8/30/24	VO	Review, revise, and further draft letter responding to alleged Second Notice of Default (3.2); confer with CS and Rhodium personnel regarding same (0.3).	3.50	875.00	3,062.50
8/30/24	CS	Review and edit response letter regarding alleged second breach.	.30	725.00	217.50
		TOTAL PROFESSIONAL SERVICES			**$ 7,190.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Victor O'Connell	VO	Partner	5.40	875.00	4,725.00
Colleen Smith	CS	Associate	3.40	725.00	2,465.00
Total			**8.80**		**$ 7,190.00**

TOTAL THIS INVOICE **$ 7,190.00**

Stris

November 1, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14249
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through August 31, 2024

RE: Whinstone Litigation

Total Professional Services	$ 79,868.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 79,868.00**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Invoice # 14249 November 1, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
8/28/24	PS	Review draft documents and confer with BA, VO, and JS regarding strategy and next steps.	.70	1250.00	875.00
8/28/24	BA	Review and correspond with bankruptcy counsel regarding edits to first day declaration (.9); correspond with A. Swartz regarding expert retention (0.1); supervise CH in collecting information necessary for bankruptcy court pro hac motions (0.3); confer with PB regarding status and high priority action items including witness preparation (0.2); correspond with JS and bankruptcy counsel regarding materials for witness preparation (0.4); begin preparing materials for first day hearing witness preparation (1.8); confer with PS and EB regarding damages expert (0.1); confer with PS and JS regarding strategy for proposed schedule for motion to assume, including discovery needs and timing (0.4).	4.20	1050.00	4,410.00
8/28/24	VO	Review and analyze bankruptcy filings provided by Quinn Emanuel (including First Day Declaration, Insurance Motion, Cash Management Motion, DIP Motion, DIP Declaration, Cash Collateral Motion, Application to Retain Verita as Claims Agent, Matrix Motion, Schedules Motion, and Supplemental Joint Administration Motion) (3.8); confer with PS and JS regarding revisions to same (0.5); correspond with Quinn Emanuel attorneys including P. Tomasco regarding same (0.2); review correspondence between P. Tomasco and M. Rosenblatt (0.1).	4.60	875.00	4,025.00
8/28/24	JS	Review and revise first day motions, declarations, and supporting documents (6.5); prepare preparation materials for first day witnesses (6.4).	12.90	875.00	11,287.50
8/28/24	PB	Attend daily document review team quality-control meeting (0.2); review bankruptcy filings (0.7); assist BA and JS with preparation of bankruptcy-related action items including witness preparation materials (0.5).	1.40	725.00	1,015.00
8/28/24	CHH	Collect and summarize attorney information for BA, JS, VO, HM, and PB for bankruptcy action pro hac vice filings (0.3); attend daily review check-in with PB, A. Swartz (Lehotsky), and discovery associates PN and MJ (0.2).	.50	325.00	162.50

Stris & Maher LLP

Invoice # 14249 November 1, 2024

Date	Tkpr	Description	Hours	Rate	Amount
8/28/24	JH	File various documents in arbitration and state court dockets for BA (0.3); review last week's correspondence and filings (3.0).	3.30	325.00	1,072.50
8/28/24	MJ	Attend document review daily team meeting (0.2); review assigned document batches.	1.90	480.00	912.00
8/28/24	PNY	Attend document review daily team meeting (0.2); review assigned document batches.	6.00	480.00	2,880.00
8/29/24	BA	Prepare for and participate in portion of preparatory session for first day hearing witness (1.7); update JS, PB, and W. Thompson regarding same and convey additional preparation materials to bankruptcy counsel (0.2); confer with JS regarding strategy and action items including motion to assume and witness preparation (0.2); confer with JS, PB, A. Swartz, and W. Thompson regarding schedule for motion to assume and correspond with bankruptcy counsel regarding same (0.9).	3.00	1050.00	3,150.00
8/29/24	JS	Prepare for and attend preparation session for first day hearing witness (2.3); review and evaluate proposed schedule for litigating motion to assume and confer with co-counsel regarding same (1.3).	3.60	875.00	3,150.00
8/29/24	CHH	Review instructions from PB regarding [redacted] for document review and implement same on review platform.	.10	325.00	32.50
8/29/24	MJ	Review additional assigned document batches.	3.80	480.00	1,824.00
8/29/24	PNY	Review additional assigned document batches.	8.00	480.00	3,840.00
8/30/24	EB	Begin reviewing and analyzing Whinstone bankruptcy discovery requests (0.3); attention to case management and staffing (0.6).	.90	1100.00	990.00
8/30/24	BA	Attend portion of bankruptcy first day hearing (2.7); confer with JS and correspond with JS and PB regarding high priority action items and schedule following status conference (0.5); review proposed schedule for motion to assume contracts and propose potential revisions to same (0.3); evaluate and confer with Stris and LKC team regarding proposed schedule, discovery, and strategy for motion to assume (1.2).	4.70	1050.00	4,935.00

Stris & Maher LLP

Invoice # 14249 November 1, 2024

Date	Tkpr	Description	Hours	Rate	Amount
8/30/24	VO	Review team correspondence regarding hearing summary (0.1); confer with [redacted] regarding hearing and next steps (0.8); confer with PB regarding discovery planning (0.3); confer with PS, EB, and JS regarding same (0.6).	1.80	875.00	1,575.00
8/30/24	JS	Prepare for and attend first day hearing (3.6); evaluate scheduling, discovery status and next steps, and expert retention given likely schedule (5.5); confer with Stris and LKC teams regarding same (2.9); evaluate staffing needs in light of timeline (1.1).	13.10	875.00	11,462.50
8/30/24	PB	Review and analyze documents for potential production and to advise review team (1.1); attend first-day hearing in bankruptcy litigation (2.8); confer with Stris and LKC teams regarding bankruptcy litigation and upcoming document review (2.0); analyze strategy and materials for upcoming document review and discovery responses (2.8).	8.70	725.00	6,307.50
8/30/24	MJ	Review assigned document batches.	1.90	480.00	912.00
8/30/24	PNY	Review assigned document batches.	8.00	480.00	3,840.00
8/31/24	EB	Continue reviewing and analyzing Whinstone bankruptcy discovery requests (0.1); correspond with Stris and LKC teams regarding scope of same (0.1); attend portion of teleconference with BA, JS, VO, J. Cohn, T. Griffin, W. Thompson, P. Tomasco, and K. Hutchins regarding status and high priority strategic and discovery-related action items (1.0); review proposed scheduling order and correspond with BA regarding potential adjustment to same (0.1); attention to case management (0.2); correspond with [redacted] regarding engagement of ERCOT expert (0.1).	1.60	1100.00	1,760.00
8/31/24	BA	Participate in portion of teleconference with litigation team and bankruptcy counsel regarding strategy, discovery, and case planning (1.0); confer with EB, JS, and J. Cohn regarding revisions to proposed scheduling order and implement same (0.3); correspond with EB, JS, and VO regarding discovery responses and document review (0.2).	1.50	1050.00	1,575.00
8/31/24	VO	Attend teleconference with LKC, Quinn, and Stris teams regarding strategy for litigation and discovery (1.1); confer with JS regarding discovery planning (0.2); attention to case management (0.5).	1.80	875.00	1,575.00

Stris & Maher LLP

Invoice # 14249 November 1, 2024

Date	Tkpr	Description	Hours	Rate	Amount
8/31/24	JS	Review Whinstone RFPs and evaluate potential responses (3.1); prepare for and attend planning call with co-counsel (1.6); review Whinstone production for potential hot documents (2.5).	7.20	875.00	6,300.00
		TOTAL PROFESSIONAL SERVICES			**$ 79,868.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	.70	1,250.00	875.00
Elizabeth Brannen	EB	Partner	2.50	1,100.00	2,750.00
Bridget Asay	BA	Partner	13.40	1,050.00	14,070.00
Victor O'Connell	VO	Partner	8.20	875.00	7,175.00
John Stokes	JS	Partner	36.80	875.00	32,200.00
Peter Brody	PB	Associate	10.10	725.00	7,322.50
Michele Jarrouj	MJ	Discovery Associate	7.60	480.00	3,648.00
Pascale Nyby	PNY	Discovery Associate	22.00	480.00	10,560.00
Cynthia Huang	CHH	Fellow	.60	325.00	195.00
Jaida Hodge-Adams	JH	Fellow	3.30	325.00	1,072.50
Total			**105.20**		**$ 79,868.00**

TOTAL THIS INVOICE **$ 79,868.00**

Stris

November 1, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14251
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through August 31, 2024

RE: Midas Green Litigation

Total Professional Services	$ 855.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 855.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14251 November 1, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
8/29/24	EB	Confer with BA and PB and correspond with [redacted] regarding suggestion of bankruptcy.	.30	1100.00	330.00
8/29/24	BA	Correspond and confer with EB regarding filing of bankruptcy notice, draft same, and review comments from bankruptcy counsel on same.	.50	1050.00	525.00
		TOTAL PROFESSIONAL SERVICES			**$ 855.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	.30	1,100.00	330.00
Bridget Asay	BA	Partner	.50	1,050.00	525.00
Total			**.80**		**$ 855.00**

TOTAL THIS INVOICE **$ 855.00**

Stris

November 1, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14252
Client # 00346
Matter # 006

INVOICE SUMMARY

For professional services rendered through August 31, 2024

RE: Tarrant County Litigation

Total Professional Services	$ 23,226.75
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 23,226.75**

Electronic Invoice

Stris & Maher LLP

Invoice # 14252 November 1, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
8/26/24	EB	No Charge - Attention to engagement letter.	.20	990.00	N/C
8/26/24	JS	Evaluate status and next steps for potential responses and confer with P. Tomasco regarding same.	1.10	787.50	866.25
8/26/24	SR	Correspond with BA and JS regarding outstanding action items relating to answer and motion to compel.	.10	585.00	58.50
8/27/24	BA	Confer with JS regarding strategy and [redacted] in light of [redacted] (0.4); research [redacted] stay and correspond with JS regarding same (0.3).	.70	945.00	661.50
8/27/24	JS	Confer with client and co-counsel regarding responses and next steps (0.9); conduct research regarding [redacted] (0.5).	1.40	787.50	1,102.50
8/28/24	EB	No Charge - Attention to engagement terms including teleconference with VO.	.20	990.00	N/C
8/28/24	BA	Correspond with JS and with bankruptcy team regarding responses for [redacted] and confer with JS regarding strategy for same (0.4); review draft motion to compel to assess further steps necessary to prepare for filing (0.3).	.70	945.00	661.50
8/28/24	JS	Review, evaluate, and edit draft responses (1.9); confer with W. Thompson and BA regarding strategy for same (1.0).	2.90	787.50	2,283.75
8/29/24	BA	Continue researching, drafting, and revising response filings, including motion to compel and answer (4.1); correspond with clients including [redacted] regarding same (0.2).	4.30	945.00	4,063.50
8/29/24	JS	Draft plea in abatement sections relating to bankruptcy, related proceedings, and arbitration.	11.40	787.50	8,977.50
8/29/24	SR	Correspond with JH regarding exhibit collection for answer.	1.50	585.00	877.50
8/29/24	JH	Confer with SR regarding exhibits (0.5); begin collecting and labeling exhibits to create exhibits packet (2.0).	2.50	292.50	731.25
8/30/24	BA	Review, draft, and revise responsive pleadings (1.5); research regarding [redacted] (0.2); confer with litigation team and bankruptcy counsel regarding [redacted] (0.3).	2.00	945.00	1,890.00

Stris & Maher LLP

Invoice # 14252 November 1, 2024

Date	Tkpr	Description	Hours	Rate	Amount
8/30/24	JH	Finalize exhibits packet for BA, SR and JS.	3.60	292.50	1,053.00

TOTAL PROFESSIONAL SERVICES **$ 23,226.75**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Bridget Asay	BA	Partner	7.70	945.00	7,276.50
John Stokes	JS	Partner	16.80	787.50	13,230.00
Sarah Rahimi	SR	Associate	1.60	585.00	936.00
Jaida Hodge-Adams	JH	Fellow	6.10	292.50	1,784.25
Total			**32.20**		**$ 23,226.75**

TOTAL THIS INVOICE **$ 23,226.75**

Stris

November 4, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14257
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through September 30, 2024

RE: Midas Green Litigation

Total Professional Services	$ 660.00
Total Expenses Advanced	$ 7,530.00
TOTAL THIS INVOICE	**$ 8,190.00**
Previous Balance	$ 855.00
TOTAL BALANCE DUE	**$ 9,045.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14257 November 4, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
9/04/24	EB	Confer with counsel for GRC regarding request to accept service of subpoena (0.2); correspond with PS, VO, JS, CS, and PB regarding same and questions for bankruptcy counsel (0.1).	.30	1100.00	330.00
9/05/24	EB	Update PB (0.1) and [redacted] (0.1) regarding request to accept service of GRC subpoena.	.20	1100.00	220.00
9/07/24	EB	Correspond with CS regarding status of subpoena service request.	.10	1100.00	110.00
		TOTAL PROFESSIONAL SERVICES			**$ 660.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	.60	1,100.00	660.00
Total			**.60**		**$ 660.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
7/31/24		JND eDiscovery - Host-Stor2.	3,765.00
8/31/24		JND eDiscovery - Host-Stor2.	3,765.00
		TOTAL EXPENSES ADVANCED	**$ 7,530.00**
		TOTAL THIS INVOICE	**$ 8,190.00**

Stris

November 4, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14259
Client # 00346
Matter # 002

INVOICE SUMMARY

For professional services rendered through September 30, 2024

RE: Temple Green Data Litigation

Total Professional Services	$ 15,300.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 15,300.00**
Previous Balance	$ 7,190.00
TOTAL BALANCE DUE	**$ 22,490.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14259 November 4, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
9/13/24	VO	Review and respond to email from [redacted] regarding Temple Green Data request for financial information (0.2); prepare email to CS regarding analysis needed of [redacted] associated with [redacted] and [redacted] (0.3).	.50	875.00	437.50
9/17/24	CS	Review and analyze viability of and requirements for [redacted] claim [redacted] (1.4); review and analyze [redacted] language regarding same (1.1).	2.50	725.00	1,812.50
9/18/24	VO	Confer with CS regarding [redacted] claim (0.2).	.20	875.00	175.00
9/18/24	CS	Confer with VO regarding (0.2) and begin analyzing [redacted] claims for [redacted] (1.9).	2.10	725.00	1,522.50
9/19/24	CS	Review and analyze information received from client and revise memorandum regarding [redacted] in light of the same (0.9); continue analyzing lease for [redacted] (2.6).	3.50	725.00	2,537.50
9/20/24	VO	Review and analyze memorandum prepared by CS regarding [redacted] (1.6); correspond with [redacted] regarding follow-up questions in support of same (0.3).	1.90	875.00	1,662.50
9/20/24	CS	Continue drafting memorandum regarding [redacted] (1.0); review and analyze contractual [redacted] liability (1.2); analyze possible remedies regarding [redacted] (1.3).	3.50	725.00	2,537.50
9/23/24	VO	Prepare assessment for [redacted] regarding [redacted] (3.2); review memoranda and correspondence from CS in connection with same (0.5).	3.70	875.00	3,237.50
9/23/24	CS	Continue analyzing and update VO regarding [redacted].	1.90	725.00	1,377.50
		TOTAL PROFESSIONAL SERVICES			**$ 15,300.00**

Stris & Maher LLP

Invoice # 14259 November 4, 2024

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Victor O'Connell	VO	Partner	6.30	875.00	5,512.50
Colleen Smith	CS	Associate	13.50	725.00	9,787.50
Total			**19.80**		**$ 15,300.00**

TOTAL THIS INVOICE **$ 15,300.00**

Stris

November 4, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14261
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through September 30, 2024

RE: Retention and Fee Applications

Total Professional Services	$ 47,165.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 47,165.00**

Electronic Invoice

Invoice # 14261 November 4, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
9/03/24	PS	Review Quinn email regarding retention pleading deadlines and parties in interest conflicts list (0.1); review and analyze exemplar retention pleadings and relevant statutes (1.9); meet with VO regarding same (0.3); confer with CS regarding preparation of retention application (0.4); correspond with Stris team regarding preparation of declaration in support of retention application (0.7); coordinate with team regarding conflict check and data collection for retention application (0.5).	3.90	1250.00	4,875.00
9/03/24	CS	Meet with PS to discuss application for order authorizing retention and employment of Stris & Maher LLP as special litigation counsel (0.4); review and analyze rules and statutes governing same (0.3).	.70	725.00	507.50
9/03/24	PB	Draft declaration of P. Stris regarding motion for retention (0.6).	.60	725.00	435.00
9/04/24	PS	Review and revise draft retention application (0.5); confer with VO regarding and update Stris team regarding same (0.4); coordinate with Stris team regarding data needed for supporting declaration (0.3).	1.20	1250.00	1,500.00
9/04/24	VO	Review and revise retention pleading (0.8); correspond with Stris team regarding same (0.2).	1.00	875.00	875.00
9/04/24	JS	Review and revise retention application.	.90	875.00	787.50
9/04/24	CS	Begin drafting application for order authorizing the retention and employment of Stris & Maher as special litigation counsel.	1.00	725.00	725.00
9/04/24	PB	Continue drafting PS declaration in support of retention application.	1.00	725.00	725.00
9/05/24	PS	Coordinate with Stris team regarding revisions to retention application.	.90	1250.00	1,125.00
9/05/24	VO	Review and comment on draft declaration [redacted] in support of retention application (0.1).	.10	875.00	87.50
9/05/24	JS	Further review and revise retention application and supporting declarations.	.40	875.00	350.00

Stris & Maher LLP

Invoice # 14261 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/05/24	CS	Draft [redacted] declaration (1.6); revise retention application to incorporate partner feedback (3.3).	4.90	725.00	3,552.50
9/05/24	PB	Continue drafting PS declaration in support of retention application.	1.70	725.00	1,232.50
9/06/24	PS	Review updated draft retention application (0.3); confer with CS regarding edits to same (0.6); confer with Stris team regarding data for accompanying declaration (0.4).	1.30	1250.00	1,625.00
9/06/24	EB	Begin reviewing draft retention application and correspond with PS, VO, JS, CS, and PB regarding revisions to same.	.20	1100.00	220.00
9/06/24	VO	Research and provide underlying factual data and information in support of retention application.	1.30	875.00	1,137.50
9/06/24	CS	Confer with PS to discuss further revisions to retention application (0.6); implement same (4.5).	5.10	725.00	3,697.50
9/08/24	PS	Review retention application and discuss edits with Stris team.	1.30	1250.00	1,625.00
9/08/24	EB	Review revised retention application and correspond with PS, VO, and CS regarding same (0.1); further revise and propose additional revisions to same (1.2); review and revise supporting declarations (0.2).	1.50	1100.00	1,650.00
9/08/24	VO	Review and revise retention application and supporting declarations of PS and C. Topping (2.4); correspond with P. Tomasco regarding related information (0.1).	2.50	875.00	2,187.50
9/08/24	JS	Review and propose comments and edits to retention application.	1.50	875.00	1,312.50
9/08/24	CS	Review edits and comments on retention application and continue to implement same.	3.50	725.00	2,537.50
9/08/24	PB	Revise PS declaration in support of retention application.	.80	725.00	580.00
9/09/24	VO	Continue to fact check and revise retention application and PS declaration (4.5); review U.S. Trustee fee guidelines in support of same (0.3).	4.80	875.00	4,200.00
9/09/24	CS	Review and edit further revised PS declaration in support of retention application (1.5); update draft of same with declaration citations (0.7).	2.20	725.00	1,595.00
9/09/24	PB	Revise PS declaration in support of retention application.	2.20	725.00	1,595.00

Stris & Maher LLP

Invoice # 14261 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/10/24	VO	Propose further revisions to PS and [redacted] declarations.	.60	875.00	525.00
9/10/24	CS	Revise retention application including to incorporate citations to [redacted] declaration.	.90	725.00	652.50
9/10/24	PB	Revise declaration of P. Stris regarding retention application to incorporate feedback from VO (0.4).	.40	725.00	290.00
9/13/24	VO	Prepare email to [redacted] regarding retention application.	.10	875.00	87.50
9/16/24	VO	Correspond and confer with Stris team regarding final edits to retention application (0.5); confer with W. Thompson regarding same (0.1); correspond with counsel at Quinn Emanuel regarding same (0.1)..	.70	875.00	612.50
9/16/24	CS	Attention to further revisions to retention application and supporting declarations.	.90	725.00	652.50
9/16/24	PB	Implement further revisions to declaration of PS in support of retention application.	.80	725.00	580.00
9/18/24	VO	Correspond with Stris team and P. Tomasco regarding payment of experts.	.20	875.00	175.00
9/19/24	VO	Confer with PS regarding retention application.	.60	875.00	525.00
9/19/24	PS	Confer with VO regarding retention application.	.60	1250.00	750.00
9/21/24	VO	Review proposed final retention application files forwarded by P. Tomasco and make final edits to same (0.7); correspond with P. Tomasco and [redacted] regarding same (0.1).	.80	875.00	700.00
9/22/24	VO	Continue making finalizing edits to retention application (0.6); correspond with P. Tomasco regarding same (0.1).	.70	875.00	612.50
9/25/24	VO	Review and respond to email from A. Popescu (Province) regarding [redacted] estimate.	.30	875.00	262.50
		TOTAL PROFESSIONAL SERVICES			**$ 47,165.00**

Stris & Maher LLP

Invoice # 14261 November 4, 2024

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	9.20	1,250.00	11,500.00
Elizabeth Brannen	EB	Partner	1.70	1,100.00	1,870.00
Victor O'Connell	VO	Partner	13.70	875.00	11,987.50
John Stokes	JS	Partner	2.80	875.00	2,450.00
Colleen Smith	CS	Associate	19.20	725.00	13,920.00
Peter Brody	PB	Associate	7.50	725.00	5,437.50
Total			**54.10**		**$ 47,165.00**

TOTAL THIS INVOICE **$ 47,165.00**

Stris

November 4, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14263
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through September 30, 2024

RE: Whinstone Litigation

Total Professional Services	$ 1,102,504.50
Total Expenses Advanced	$ 36,733.50
TOTAL THIS INVOICE	**$ 1,139,238.00**
Previous Balance	$ 79,868.00
TOTAL BALANCE DUE	**$ 1,219,106.00**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Stris & Maher LLP

Invoice # 14263 November 4, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
9/01/24	BA	Review Whinstone's first set of requests for production and begin drafting objections and responses (2.5); research local protective orders and correspond with bankruptcy counsel and litigation team regarding proposed scheduling order and protective order (0.3).	2.80	1050.00	2,940.00
9/01/24	VO	Call with JS regarding discovery planning (0.3); confer and correspond with litigation team regarding trial planning (0.4).	.70	875.00	612.50
9/01/24	JS	Further review and evaluate Whinstone documents for use in depositions and at trial.	5.50	875.00	4,812.50
9/02/24	EB	Review revised proposed scheduling order (0.1); correspond with BA and JS regarding same (0.1); attention to deposition planning and case management (0.1).	.30	1100.00	330.00
9/02/24	BA	Analyze and begin preparing responses to Whinstone's first sets of RFPs (1.9); correspond with A. Swartz regarding same (0.1); syntehsize and convey comments on revised schedule to bankruptcy and litigation counsel (0.3); review and revise final draft of proposed schedule for P. Tomasco and opposing counsel (0.2); review and correspond with JS and P. Tomasco regarding draft notice of removal and related filings (0.3); correspond with bankruptcy counsel and with litigation team regarding action items in support of removal of Tarrant County litigation to bankruptcy court (0.3); draft and correspond with litigation team regarding proposed interrogatories to Whinstone (1.8).	4.80	1050.00	5,040.00
9/02/24	VO	Confer with J. Cohn regarding strategic planning (0.2); emails with P. Tomasco regarding same (0.1); confer with PB regarding document review staffing and strategy (0.5).	.80	875.00	700.00
9/02/24	JS	Prepare strategy for defensive depositions (1.4); further review Whinstone production for hot documents (0.7); review and evaluate Notice of Removal of Tarrant County litigation and supporting documents (0.7); evaluate strategy and begin drafting interrogatories for inclusion in initial set (1.1).	3.90	875.00	3,412.50
9/02/24	PB	Confer with VO regarding document review staffing.	.50	725.00	362.50

Stris & Maher LLP

Invoice # 14263 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/02/24	MJ	Review assigned document batches.	.50	480.00	240.00
9/02/24	HS	Review and analyze document review protocol to prepare for advising and assisting with document review (0.8).	.80	480.00	384.00
9/03/24	PS	Correspond with Stris team regarding trial planning (0.1).	.10	1250.00	125.00
9/03/24	EB	Attend teleconference with ERCOT expert C. Griffey (0.1); confer with BA, JS, PB, and HM regarding same and expert retention letters (0.2); correspond with [redacted] and C. Griffey regarding status and next steps (0.1); attention to case management (0.1).	.50	1100.00	550.00
9/03/24	BA	Participate in teleconference with [redacted], bankruptcy counsel, and litigation counsel to discuss high priority action items in contested matter, including schedule, discovery, and case strategy (1.0); review and correspond with P. Tomasco regarding edits to motion to transfer (0.9); review proposed protocols for deposition preparation (0.1); attend teleconferences with JS, VO, PB, and A. Swartz regarding deposition planning and discovery (1.1); correspond with EB regarding engagement of expert C. Griffey (0.1); correspond with litigation team regarding engagement of technology vendor for discovery (0.3); review proposed scheduling order from Whinstone and related team correspondence (0.3); evaluate potential production regarding electricity data (0.2); evaluate exemplar protective order for possible use (0.2).	4.20	1050.00	4,410.00
9/03/24	VO	Attend videoconference with Quinn, LKC, and Stris teams to discuss strategy (1.0); confer with JS regarding deposition and staffing plan (0.7); confer with PB regarding document discovery review planning (0.3); confer with HM and CH regarding document review logistics and assignments (0.2).	2.10	875.00	1,837.50
9/03/24	JS	Review and evaluate scheduling order and propose edits to same (0.8); plan discovery and trial preparation steps in light of likely schedule (9.3); confer with BA, WT, and VO regarding interrogatories, deposition planning, and global strategy (1.8).	11.90	875.00	10,412.50

Stris & Maher LLP

Invoice # 14263 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/03/24	PB	Attention to document review team staffing and strategy and advise HM and review team regarding same (0.5); attend team teleconference regarding litigation strategy (1.0); attend teleconference with BA, JS, and A. Swartz regarding document review and production strategy (0.8); analyze and prepare documents for analysis by review team (4.8); confer with VO regarding review team staffing and strategy (0.3); confer with JS regarding discovery and review plan (0.6); attention to discovery associate and quality control document reviewer onboarding (0.4).	8.40	725.00	6,090.00
9/03/24	SR	Confer with PB regarding document review project (0.2); review and analyze document review [redacted] (2.3).	2.50	650.00	1,625.00
9/03/24	HM	Draft email to T. Stefan of Setec Investigations regarding engagement letter changes and circulate to BA, VO, EB, JS, and PB (0.3); confer with PB about second document production and document review timeline and HS about document review [redacted] and procedure (0.6); confer with VA about document review [redacted] and procedure (0.7); correspond with FF to arrange conference regarding same (0.1); correspond with HS, VA, and FF regarding document review (0.2).	1.90	600.00	1,140.00
9/03/24	MJ	Attend document review daily team meeting (0.5); review assigned document batches (3.6).	4.10	480.00	1,968.00
9/03/24	PNY	Attend document review daily team meeting (0.5); review assigned document batches (7.5).	8.00	480.00	3,840.00
9/03/24	VA	Review document review protocol [redacted] (1.0); attend case review call with HM (0.5); review assigned document batches (3.0).	4.50	480.00	2,160.00
9/03/24	HS	Review assigned document batches.	6.80	480.00	3,264.00
9/03/24	FF	Attend portion of document review daily team meeting (0.2); review assigned document batches (9.8).	10.00	480.00	4,800.00

Stris & Maher LLP

Invoice # 14263 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/03/24	CHH	Attend portion of teleconference with PB, HM, A. Swartz (Lehotsky) and review team regarding document review (0.2); review and analyze A. Swartz emails regarding case management and implement recommendations in same (0.3); update VO and HM regarding document review progress (0.1); correspond with review team members regarding same (0.4).	1.00	325.00	325.00
9/04/24	PS	Review updates regarding experts (0.2); Tarrant County lawsuit (0.1); and discovery issues and action items (0.3).	.60	1250.00	750.00
9/04/24	EB	Review and respond to team correspondence regarding status and high priority action items (0.3).	.30	1100.00	330.00
9/04/24	BA	Confer with JS and with W. Thompson regarding discovery strategy and action items (0.8); attend portion of teleconference with Stris and LKC litigation team to discuss trial planning including expert retention (0.6); attend portion of teleconference with JS, CS, SR, VO, and PB to discuss deposition planning (0.8); confer with PB and JS regarding document review and responses to Whinstone's RFPs (0.4); confer with PB and Stoneturn expert team regarding bankruptcy engagement and scope (0.3); review and revise draft protective order and convey same to bankruptcy counsel and litigation team for review (1.6); review and revise draft interrogatories and convey same to litigation team for review (1.0); review proposed engagement letter for C. Griffey and correspond with EB, JS, and PB regarding same (0.2); review team correspondence regarding schedule and proposed order submitted by Whinstone (0.2).	5.70	1050.00	5,985.00
9/04/24	VO	Attend videoconference with LKC and Stris teams regarding expert planning (0.8); attend videoconference with Stris team regarding deposition planning (1.0).	1.80	875.00	1,575.00

Stris & Maher LLP

Invoice # 14263 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/04/24	JS	Prepare defensive deposition plan (1.1); confer with BA and Stris team regarding deposition assignments and planning (1.3); review and revise scheduling order and confer with opposing counsel regarding same (1.9); draft correspondence to Whinstone regarding schedule (0.7); review and revise interrogatories (1.5); review other outstanding written discovery matters (1.4); evaluate expert strategy (1.6) and attend videoconference with Stris and LKC teams regarding same (0.8); review status of document production and confer with PB and BA regarding same (1.5).	11.80	875.00	10,325.00
9/04/24	PB	Attend teleconference with Stris and LKC teams regarding expert strategy and workflow planning (0.8); attend portion of teleconference with BA, JS, SR, and HM regarding defensive deposition strategy (0.8); review and analyze material for potential production (3.4); confer with BA and JS regarding responses to Whinstone discovery requests (0.5); confer and correspond with M. Haley (Stoneturn), A. Cooper (Stoneturn), and BA regarding Stoneturn expert analysis (0.4); analyze financial documentation requested by expert team (2.6); attention to and update VO regarding review team staffing (0.3); revise draft engagement letter for expert C. Griffey (0.5).	8.50	725.00	6,162.50
9/04/24	CS	Attend portion of Stris team teleconference regarding deposition planning and preparation for Rhodium witnesses.	1.00	725.00	725.00
9/04/24	SR	Attend teleconference with Stris and LKC teams regarding expert and fact witnesses (0.8); attend portion of teleconference with BA, JS, VO, CS, PB, HM, CHH, and SB regarding defensive deposition preparation and planning (0.9); begin reviewing potentially privileged documents and continue analyzing document review [redacted] in connection with same (4.2).	5.90	650.00	3,835.00

Stris & Maher LLP

Invoice # 14263 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/04/24	HM	Attend portion of teleconference with BA, JS, VO, CS, PB, SR, CHH, and SB for defensive deposition preparation and planning (0.9); attend document review daily team meeting (0.2); confer with FF about document review protocol and procedure (0.9); draft requests for production to Whinstone for bankruptcy proceeding (1.5); manage and revise [redacted] docket, Master Task List, and schedule of deadlines (1.0); attend portion of teleconference with BA, JS, VO, CS, PB, SR, CHH, JHA, SB, A. Swartz, J. Cohn, and W. Thompson for expert report and deposition planning (0.6); draft [redacted] for performing quality checks for second production (1.0); correspond with HH, VO, VA, HS, and FF about document review (0.5).	6.60	600.00	3,960.00
9/04/24	MJ	Attend document review daily team meeting (0.2); review assigned document batches (4.8).	5.00	480.00	2,400.00
9/04/24	PNY	Attend document review daily team meeting (0.2); review assigned document batches (7.8).	8.00	480.00	3,840.00
9/04/24	VA	Review document review protocol (0.3); attend document review daily team meeting (0.2); review assigned document batches (7.5).	8.00	480.00	3,840.00
9/04/24	HS	Review assigned document batches.	5.50	480.00	2,640.00
9/04/24	FF	Attend document review daily team meeting (0.2); review assigned document batches (9.8).	10.00	480.00	4,800.00
9/04/24	SB	No Charge - Attend teleconference with Stris and LKC teams regarding expert and fact witnesses (0.8); attend teleconference with BA, JS, VO, CS, PB, HM, CHH and SR for defensive deposition preparation and planning (0.9); review dockets to identify relevant documents in preparation for [redacted] depositions (1.6).	3.30	325.00	N/C

Stris & Maher LLP

Invoice # 14263 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/04/24	CHH	Review and analyze document review progress and update PB regarding same (0.4); review and analyze [redacted] (Rhodium) emails regarding [redacted] (0.2); attend and participate in daily document review check-in with PB, HM, A. Swartz (Lehotsky), and discovery associates (0.2); attend portion of teleconference with BA, JS, VO, CS, PB, SR, HM, and SB for deposition preparation and planning (0.9); summarize key takeaways from same for Stris team (0.3); collect Whinstone financial documents further review by PB (0.2); review A. Swartz email regarding offensive document review and assist with set up of same (0.3); collect key documents for JS and VO review for defensive deposition preparation (0.5); confer with discovery associate FF regarding document review and support for same (0.2).	3.20	325.00	1,040.00
9/04/24	JH	Attend portion of teleconference with JS, AS, HM, BA, JC, VO, SB, WT, SR and PB regarding deposition preparation and planning (0.8); prepare notes for same (1.0).	1.80	325.00	585.00
9/05/24	PS	Review scheduling order and related emails (0.2); review emails regarding discovery (0.6); coordinate with team regarding data collection for declaration (0.4); review draft [redacted] (0.2); review emails between P. Rosenblatt and P. Tomasco regarding third party subpoenas (0.1).	1.50	1250.00	1,875.00
9/05/24	EB	Correspond with PB regarding Stoneturn engagement letter (0.1); review team correspondence and scheduling order (0.1).	.20	1100.00	220.00

Stris & Maher LLP

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Date	Tkpr	Description	Hours	Rate	Amount
9/05/24	BA	Correspond with K. Hutchins and bankruptcy counsel to confirm plan for review, finalization, and service of RFPs and subpoenas, and correspond with A. Swartz regarding compliance locations for subpoenas (0.3); review draft subpoenas to C. Harris, L. Therriot, and Riot, and convey edits on same to A. Swartz (1); review draft RFPs to Whinstone and convey revisions to same to HM, JS, and team (0.5); correspond with JS regarding status of and plan for discovery (0.1); confer with JS regarding strategy and action items (0.2); review edits on draft protective order from K. Hutchins, correspond with K. Hutchins regarding same, finalize same and convey to opposing counsel for review (0.4); correspond with HM, JS, and PB as necessary to monitor preparation for next document production and oversee finalization and service of requests to produce on Whinstone (0.8); review and revise draft interrogatories to Whinstone and convey same to litigation team for review (1); review motion to transfer and correspond with P. Tomasco regarding same (0.2); correspond with PB and team regarding production formatting to maintain consistency with prior productions (0.2); review scheduling order as entered by court and correspond with CH and team regarding calendaring (0.2).	4.90	1050.00	5,145.00
9/05/24	JS	Attend teleconference with BA regarding discovery status and next steps (0.3); attend teleconference with W. Thompson regarding offensive discovery and outlining core arguments in connection with same (0.8); review written discovery to be served on Whinstone and third parties (2.6); review protective order (0.7); review [redacted] and emails in preparation for depositions of Rhodium [redacted] (4.5); work on deposition line planning (1.5); review M. Thomas deficiency letter and begin preparing response to same (1.1); review new edits to motion to transfer [redacted] (0.5).	12.00	875.00	10,500.00
9/05/24	PB	Prepare second production of documents to Whinstone and correspondence regarding same (6.2); attend daily call with document review associate team regarding quality-control issues (0.2); teleconference with S. Rahimi regarding production review strategy (0.4)	6.80	725.00	4,930.00

Stris & Maher LLP

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Date	Tkpr	Description	Hours	Rate	Amount
9/05/24	CS	Meet with AA to discuss documents in Whinstone production (0.2); begin reviewing documents in Whinstone production relevant to [redacted] (2.0); review background information regarding [redacted] in anticipation of preparing him for his deposition (0.4).	2.60	725.00	1,885.00
9/05/24	SR	Continue conducting document review of potentially privileged documents (7.2); attend teleconference with PB regarding the same (0.3).	7.50	650.00	4,875.00
9/05/24	HM	Attend document review daily team meeting (0.3); review assigned document batches (7.9).	8.20	600.00	4,920.00
9/05/24	MJ	Attend document review daily team meeting (0.3); review assigned document batches (3.0).	3.30	480.00	1,584.00
9/05/24	PNY	Attend document review daily team meeting (0.3); review assigned document batches (9.7).	10.00	480.00	4,800.00
9/05/24	VA	Attend document review daily team meeting (0.3), review assigned document batches (7.7).	8.00	480.00	3,840.00
9/05/24	HS	Attend document review daily team meeting (0.3); review assigned document batches (5.9).	6.20	480.00	2,976.00
9/05/24	FF	Attend document review daily team meeting (0.3); review assigned document batches (9.7).	10.00	480.00	4,800.00
9/05/24	CHH	Review and collate [redacted] documents in .pdf form in preparation for depositions (0.4); review and organize documents for discovery associates to review, emails with PB, HM, and A. Swartz (Lehotsky) regarding same (0.3); prepare potential second production set for PB, HM, and A. Swartz (Lehotsky) to review (0.8); emails with FF regarding review issues and troubleshoot same (0.2); review and analyze scheduling order and update matter docket and calendar accordingly to ensure compliance (0.7); telephone call with JS regarding document review procedures (0.1).	2.50	325.00	812.50
9/05/24	ASA	Meet with CS to discuss documents in Whinstone production (0.2); provide overview of documents in Whinstone production to assist CS deposition preparation (0.5).	.70	325.00	227.50

Stris & Maher LLP

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Date	Tkpr	Description	Hours	Rate	Amount
9/06/24	PS	Prepare for and attend teleconference with P. Tomasco, P. Rosenblatt, JS, and VO regarding third party subpoenas (1.4); review subpoenas and discuss with internal team (1.1); review emails regarding discovery (0.5).	3.00	1250.00	3,750.00
9/06/24	EB	Correspond with BA and JS regarding priority action items for Stris attorney team.	.10	1100.00	110.00
9/06/24	BA	Review and finalize proposed engagement letter for potential expert C. Griffey, correspond with litigation team regarding same, and convey same to C. Griffey for review and to schedule meeting (0.4); review draft subpoenas to Riot, C. Harris, and J. Ledoux, correspond with HM regarding revisions to same (1.0); review and approve subpoena to L. Therriot (0.3); confer with JS regarding discovery and third party subpoenas (0.4); review Whinstone's interrogatories (0.3); correspond with HM, JS, and PB to confirm status of pending discovery and production (0.2); outline priority action items for team, correspond with JS and EB regarding same, and convey same to EB, JS, PB, CS, SR, VO, and PS (0.5); review outline of [redacted] deadlines prepared by HM and correspond with HM regarding revisions to same (0.2).	3.30	1050.00	3,465.00
9/06/24	VO	Attend teleconference with PS, JS, P. Tomasco, [redacted], and P. Rosenblatt regarding investor subpoena (0.3); correspondence with [redacted] (0.1); update team (0.1) and confer with [redacted] (0.2) regarding same.	.70	875.00	612.50
9/06/24	JS	Teleconferences with BA regarding discovery matters and third-party subpoenas (0.4); review discovery to be issued (1.5); review [redacted] in connection with next production (0.7); review [redacted] in connection with [redacted] deposition prep (3.5); confer with VO regarding deposition prep (0.4); work on potential response letter to M. Thomas regarding outstanding discovery issues (0.4); prepare for and attend teleconference with PS, VO, P. Tomasco, and P. Rosenblatt regarding subpoenas [redacted] (0.5); review [redacted] subpoenas and evaluate same (0.9).	8.30	875.00	7,262.50

Stris & Maher LLP

Invoice # 14263 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/06/24	PB	Attend teleconference with PB, HM, CHH, and [redacted] (Rhodium) to discuss financial documents for production (0.8); attend daily call with document review associate team regarding production issues (0.3); teleconference with [redacted] (Rhodium) regarding data collection (0.5); teleconference with J. Stokes regarding production plan (0.2); prepare second production of documents to Whinstone and perform final review of same (4.3).	6.10	725.00	4,422.50
9/06/24	CS	Meet with SR to discuss plan for preparing [redacted] and [redacted] for their depositions (0.5); review and analyze documents received from Whinstone relevant to [redacted] to begin preparing for his deposition (2.1).	2.60	725.00	1,885.00
9/06/24	SR	Continue conducting document review of potentially privileged documents (6.3); attend videoconference with CS to begin planning deposition preparations for [redacted] and [redacted] (0.3).	6.60	650.00	4,290.00
9/06/24	HM	Complete quality check of additional documents (3.7); attend document review daily team meeting (0.3); correspond with discovery associates about daily tasks and action items (0.6); update and recirculate information concerning review guidelines to discovery associates (0.5); attend teleconference with PB, CHH, and client contacts regarding financial documents (0.8); update task list to reflect current schedule and deadlines (1.4); advise and quality check calendaring of same (0.5); revise, finalize, and serve subpoena notices for multiple third party witnesses (1.8); correspond with CS and SR regarding documents for [redacted] and [redacted] deposition preparation (0.5).	10.10	600.00	6,060.00
9/06/24	MJ	Attend document review daily team meeting (0.3); review assigned documents (0.7).	1.00	480.00	480.00
9/06/24	PNY	Attend document review daily team meeting (0.3); review assigned document batches (7.7).	8.00	480.00	3,840.00
9/06/24	VA	Attend document review daily team meeting (0.3); review assigned document batches (7.7).	8.00	480.00	3,840.00
9/06/24	HS	Attend document review daily team meeting (0.3); review assigned document batches (9.6).	9.90	480.00	4,752.00

Stris & Maher LLP

Invoice # 14263 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/06/24	FF	Attend document review daily team meeting (0.3); review assigned document batches (9.7).	10.00	480.00	4,800.00
9/06/24	CHH	Attend teleconference with PB, HM, and Rhodium [redacted] to discuss financial documents (0.8); attend and participate in daily check-in regarding document review with HM, PB, and discovery associates (0.3); prepare proposed production set 2 for PB and HM further review (2.0); review and analyze documents for correspondence regarding power contracts (3.0).	6.10	325.00	1,982.50
9/06/24	JH	File exchanged discovery [redacted] (0.2); update Bankruptcy docket (0.3).	.50	325.00	162.50
9/06/24	ASA	Update [redacted] to reflect recent developments at request of HM.	.40	325.00	130.00
9/07/24	PS	Review master task list and witness preparation [redacted] and correspond with team regarding same.	1.10	1250.00	1,375.00
9/07/24	EB	Review interrogatories served by Whinstone and correspondence from co-counsel regarding [redacted] (0.1); research same (0.1); correspond with BA and JS regarding research results and [redacted] objections to same (0.1); attention to case management (0.8).	1.10	1100.00	1,210.00
9/07/24	BA	Research and analyze [redacted] third party subpoenas, including [redacted] and correspond with JS regarding potential strategies for same (1.5); research interrogatory limits and correspond with EB and JS regarding same, as relevant to Whinstone's service of interrogatories and with HM regarding status of state court proceedings (0.2).	1.70	1050.00	1,785.00
9/07/24	JS	Evaluate documents that need further review in connection with defensive deposition preparation [redacted].	1.30	875.00	1,137.50
9/07/24	HM	Update schedule of deadlines and master task list and circulate it to Stris & Maher and Lehotsky Keller Cohn litigation teams (1.8); update Rhodium [redacted] and circulate to Stris & Maher litigation team (1.8).	3.60	600.00	2,160.00
9/07/24	VA	Review assigned document batches (4.0).	4.00	480.00	1,920.00
9/07/24	HS	Review assigned document batches (10.0).	10.00	480.00	4,800.00

Stris & Maher LLP

Invoice # 14263 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/07/24	FF	Review assigned document batches (10.0).	10.00	480.00	4,800.00
9/08/24	PS	Confer with team regarding third party subpoenas.	.60	1250.00	750.00
9/08/24	EB	Review task list and correspond with PS, BA and JS regarding deposition planning (0.1); correspond with BA and JS regarding responses and objections to interrogatories (0.1); begin reviewing witness preparation [redacted] (0.1); correspond with HM regarding initial revisions to same and JS regarding further review and revisions (0.1).	.40	1100.00	440.00
9/08/24	BA	Continue researching and analyzing [redacted] for [redacted] subpoenas, convey summary of analysis and recommendation to litigation team, and correspond further with PS and JS regarding strategy for same (2.2); review proposed email to M. Thomas following up on discovery issues, propose revisions to same, and correspond with JS regarding related discovery matters (0.3); correspond with PB, HM, and JS regarding confidentiality tagging on production and collection of documents for ERCOT expert C. Griffey (0.2); correspond with JS regarding priority action items and correspond with team regarding same (0.4).	3.10	1050.00	3,255.00
9/08/24	JS	Prepare list of priorities for discovery and [redacted] for the week (0.8); draft response response email to M. Thomas deficiency letter (0.5).	1.30	875.00	1,137.50
9/08/24	SR	Continue reviewing potentially privileged documents.	3.40	650.00	2,210.00
9/08/24	HM	Update task list including to add items from BA (0.3); revise draft of email to T. Stefan (Setec Investigations) regarding engagement letter amendment (0.1); conduct quality control review of documents designated for production (0.6).	1.00	600.00	600.00
9/08/24	MJ	Review assigned documents (1.6).	1.60	480.00	768.00
9/08/24	PNY	Review assigned document batches (6.0).	6.00	480.00	2,880.00
9/08/24	VA	Review assigned document batches (7.0).	7.00	480.00	3,360.00
9/08/24	HS	Review assigned document batches (5.1).	5.10	480.00	2,448.00
9/08/24	FF	Review assigned document batches (8.0).	8.00	480.00	3,840.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/09/24	PS	Meet with PB regarding retention application revisions (0.5); review [redacted] in [redacted] dispute and confer J. Cohn regarding same (1.7); review emails and meet with team regarding trial issues and strategy (0.8); review emails regarding discovery and meet with team regarding same (0.4).	3.40	1250.00	4,250.00
9/09/24	EB	Confer with BA regarding status and high priority action items including deposition and trial preparation and accommodations (0.2); instruct AA and SB regarding action items in support of same (0.1); correspond with PS, BA, VO, and JS regarding trial team and attendees (0.1); confer with JS regarding high priority action items including deposition preparation [redacted] and case management-related action items (0.3); review and respond to team correspondence regarding high priority action items including [redacted], and trial planning and attendance (0.2).	.90	1100.00	990.00
9/09/24	BA	Correspond with JS and PB regarding discovery action items and deadlines (0.1); attend teleconference with JS, PB, and HM regarding priority action items, including upcoming discovery deadlines and expert retention (0.7); review updates and correspond with A. Swartz regarding service of subpoenas (0.1); correspond with HM regarding engagement letter for Setec, discovery vendor (0.1); begin analyzing potential issues and topics for additional affirmative discovery and correspond with team regarding need for same (0.6); correspond with C. Griffey regarding expert engagement and with PB regarding revised expert engagement letter for T. Lewis (0.2).	1.80	1050.00	1,890.00
9/09/24	VO	Emails with team regarding trial logistics (0.3); emails with team regarding [redacted] and review [redacted] (0.2); call and email [redacted] regarding same (0.1); confer with JS regarding same (0.3); confer with [redacted] and JS regarding same (0.5); emails with J. Cohn regarding same (0.3); confer with PB regarding document review progress and next steps (0.4); confer with JS regarding preparation for [redacted] defensive depositions (0.5).	3.50	875.00	3,062.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/09/24	JS	Attend teleconference with BA, PB, and HM regarding outstanding discovery issues and next steps (0.7); attend teleconferences with VO regarding [redacted] (0.3) and preparing for depositions of [redacted] (0.5); review issues in [redacted] and evaluate [redacted] issues (0.9); review April 22 notice of termination and evaluate [redacted] of same (1.3); correspond with co-counsel regarding same (0.3); attend teleconference with CS regarding drafting dispositive motion regarding same (0.1); review [redacted] documents in connection with deposition prep (1.0); plan for trial [redacted] (0.5); review energy credit calculation documents in connection with potential expert retention (0.3); review existing outlines of [redacted] depositions in connection with preparing for depositions [redacted] (1.3).	7.20	875.00	6,300.00
9/09/24	PB	Attend daily discovery associate teleconference (0.2); attend teleconference with BA, JS, and HM regarding case strategy and workflow allocation (0.7); coordinate collection of documents for, and review and prepare documents for, upcoming productions to Whinstone (6.8); confer with HM regarding quality check review (0.2); confer with VO regarding review staffing and next steps (0.4).	8.30	725.00	6,017.50
9/09/24	SR	Continue conducting document review of potentially privileged documents.	4.50	650.00	2,925.00
9/09/24	HM	Attend document review daily team meeting (0.2); advise FF regarding review (0.2); attend teleconference with BA, JS, and PB about upcoming deadlines and outstanding discovery (0.7); confer with PB about performing quality check on responsive documents for next production (0.2); draft responses to Whinstone's first set of requests for production (3.0); update and recirculate [redacted] Document Review [redacted] (0.2); confer with T. Stefan of Setec Investigations regarding amendments to engagement letter (0.2); revise, finalize, and serve subpoena to Riot through Foley (0.3); compile and send deposition preparation materials for [redacted] to JS and VO (0.3); correspond with JH regarding responses to Whinstone's interrogatories (0.1).	5.40	600.00	3,240.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/09/24	MJ	Attend document review daily team meeting (0.2); review assigned document batches (1.4).	1.60	480.00	768.00
9/09/24	PNY	Attend document review daily team meeting (0.2); review assigned document batches (9.8).	10.00	480.00	4,800.00
9/09/24	VA	Attend document review daily team (0.2); review assigned document batches (9.8).	10.00	480.00	4,800.00
9/09/24	HS	Review assigned document batches (4.0).	4.00	480.00	1,920.00
9/09/24	FF	Attend document review daily team meeting (0.2); review assigned document batches (9.8).	10.00	480.00	4,800.00
9/09/24	CHH	Finalize search terms for [redacted] email review and confer with JS and JHA regarding same (0.2); daily document review check-in with HM, PB, and discovery associates (0.2); prepare PS and CS information for pro hac vice applications (0.2); telephone [redacted] regarding November trial and logistics of same (0.1); assist with onboarding new attorneys to case per emails with A. Swartz (Lehotsky) (0.1).	.80	325.00	260.00
9/09/24	JH	Update docket and files with final exchanged discovery [redacted] (0.2); finalize Riot subpoena for HM (0.3); begin document review to issue-tag emails [redacted] production sets sent to or from [redacted] (4.5).	5.00	325.00	1,625.00
9/09/24	ASA	Assist JS and JH with review of client documents (0.6); confer with JH regarding same (0.1).	.70	325.00	227.50
9/10/24	PS	Review emails regarding discovery and Tarrant County lawsuit and discuss with team (0.3); review emails between P. Rosenblatt and P. Tomasco (0.2); review [redacted] filings and confer with team regarding same (0.4).	.90	1250.00	1,125.00
9/10/24	EB	Review proposed revisions to damages expert and text collection consulting engagement letters (0.2); correspond with BA, PB, and HM regarding revisions to same (0.2); review [redacted] materials (0.1); advise PB regarding revisions to [redacted] regarding same (0.2).	.70	1100.00	770.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/10/24	BA	Review updates and correspond with A. Swartz and team regarding service of subpoenas (0.1); correspond with [redacted] regarding service of subpoena on Imperium (0.1); correspond with PB, EB, and JS regarding expert engagement for C. Griffey and terms of said engagement, confer with C. Griffey regarding same, finalize engagement letter and convey same to C. Griffey, and arrange meeting with C. Griffey and team (0.8); review draft interrogatories and team correspondence regarding same, and ask A. Swartz to convey same to bankruptcy counsel for review (0.4); review correspondence and filings related to [redacted] related to [redacted] and correspond with litigation team regarding same (0.3); confer with JS regarding discovery and [redacted] issues (0.3); correspond with [redacted] and litigation team regarding weekly client meetings (0.2); continue analyzing need for additional affirmative discovery including potential RFAs and additional interrogatories (0.4); correspond with PB and HM regarding document production issues (0.1); review draft engagement letter for Setec, discovery vendor, and correspond with HM and EB regarding need for revisions to same (0.2).	2.90	1050.00	3,045.00
9/10/24	VO	Emails with team and [redacted] regarding letter [redacted] (0.2); confer with [redacted] regarding same (0.2); emails with [redacted] and J. Cohn regarding same (0.1).	.50	875.00	437.50
9/10/24	JS	Confer with W. Thompson regarding discovery issues and outlining of key merits arguments (0.8); confer with BA regarding discovery and potential [redacted] issues (0.3); draft [redacted] deposition outline, themes, and narrative (14.8).	15.90	875.00	13,912.50
9/10/24	SR	Continue conducting document review of potentially privileged documents (6.2); correspond with HM and CH regarding the same (0.1).	6.30	650.00	4,095.00
9/10/24	SB	No Charge - Format Responses to Whinstone's RFPs for HM.	2.90	325.00	N/C
9/10/24	CS	Review and analyze case law and legal authority regarding bankruptcy laws and standards governing motions to assume executory contracts (2); analyze notice of termination and outline [redacted] for termination cited therein (2.8).	4.80	725.00	3,480.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/10/24	CHH	Complete review of contract negotiation and drafting emails between Whinstone and Rhodium and send memorandum on same to JS for review (2.2); daily check-in with HM, PB, and discovery associates regarding document review (0.2); confer with HM and PB regarding preparations for third set of production (0.2); ingest various client documents into review database for further review (0.4); prepare potential third set of production batches for HM and PB review (1.2); analyze document review progress and summarize same to PB (0.2).	4.40	325.00	1,430.00
9/10/24	JH	Create shell for Rhodium draft responses to Whinstone's interrogatories and Requests for Admission (1.0); continue document review to issue-tag emails [redacted] production sets sent to or from [redacted] (4.0).	5.00	325.00	1,625.00
9/10/24	PB	Coordinate collection, ingestion, and review of documents for upcoming productions to Whinstone (3.0); revise retention letter for expert T. Lewis (1.2); attend daily document review associate team call and follow-up discussion with HM and CS (0.5); teleconference and correspondence with VO regarding review strategy and staffing (0.8).	5.50	725.00	3,987.50
9/10/24	HM	Begin review of documents designated for further review (0.5); attend document review daily team meeting (0.2); confer with CH and PB regarding documents for potential production 3 (0.2); confer with T. Stefan, EB, JS, PB, and BA regarding amendments to engagement letter with Setec Investigations (0.5); continue drafting responses to Whinstone's first set of requests for production (3.0); draft first set of requests for admission for review by JS, BA, and PB (2.0); revise and circulate list of deadlines to Stris and LKC litigation teams (0.5); review and revise first set of interrogatories (0.3); correspond with AS, PB, BA, and JHA regarding filing procedures and pro hac vice applications (0.5); answer document review questions and update materials regarding review guidelines (0.8).	7.70	600.00	4,620.00
9/10/24	MJ	Attend document review daily team meeting (0.2); review assigned document batches (2.8).	3.00	480.00	1,440.00
9/10/24	VA	Attend document review daily team (0.2); review assigned document batches (9.8).	10.00	480.00	4,800.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/10/24	HS	Attend document review daily team meeting (0.2); review assigned document batches (5.8).	6.00	480.00	2,880.00
9/10/24	FF	Attend document review daily team meeting (0.2); review assigned document batches (9.8).	10.00	480.00	4,800.00
9/11/24	PS	Review [redacted] filings and confer with team regarding same (0.3); review emails regarding discovery (0.3).	.60	1250.00	750.00
9/11/24	EB	Review and respond to team correspondence regarding high priority action items including [redacted] (0.2); advise HM regarding revisions to text collection consulting engagement rider (0.1); correspond with VO, PB, and TT regarding case materials and instructions for deposition preparation and future project work (0.1).	.40	1100.00	440.00
9/11/24	BA	Confer with ERCOT expert C. Griffey, JS, HM, and Rhodium contacts regarding data and information requests (1.3); Attend teleconference with JS, HM, [redacted], and C. Griffey to discuss data needed for ERCOT expert analysis (1.1); attend further teleconference with JS and C. Griffey regarding data needed and discovery requests necessary for same (0.3); confer with JS, W. Thompson, J. Cohn, and client regarding [redacted] issues (1.0); research same (0.4); correspond with [redacted] and litigation team regarding Imperium subpoena (0.1); review draft interrogatories and confer with litigation team regarding same (0.3); review draft requests to admit, analyze exemplars for same, and correspond with HM, PB, and JS regarding revisions to same (0.4); correspond with HM, JS, and C. Griffey regarding discovery matters (0.3); confer with JS regarding affirmative discovery (0.1); confer with C. Griffey and JS regarding affirmative discovery/information needs (0.4); correspond with JS regarding email to M. Thomas, review and revise same, and correspond with bankruptcy counsel regarding status of protective order (0.1); correspond with PB regarding document production issues (0.1); correspond with HM regarding subpoena to Priority Power (0.1); revise draft second set of RFPs to add requests [redacted] (1.0).	7.00	1050.00	7,350.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/11/24	JS	Attend teleconference with BA, HM, [redacted] and C. Griffey to discuss data needed for ERCOT expert analysis (1.1); attend further teleconference with BA and C. Griffey regarding data needed and discovery requests necessary for same (0.3); attend teleconferences with BA regarding outstanding discovery issues on interrogatories, requests for admission, and requests for production, as well as ERCOT expert issues and next steps (1.5); draft requests for admission (3.5); review and revise interrogatories (1.1); review and revise second set of requests for production (0.6); review and evaluate draft brief regarding April 22 Notice of Termination and [redacted] in light of same (2.3); prepare for and attend teleconference with BA, W. Thompson, J. Cohn, [redacted], and [redacted] regarding [redacted] litigation (1.3) and further evaluate [redacted] and potential next steps (0.9); continue working on defensive deposition outlines (2.5).	15.10	875.00	13,212.50
9/11/24	CS	Begin drafting motion for partial summary judgment based on portions of April 22, 2024 notice of termination that are ineffective as a matter of law; review and analyze case law in support of the same (8.5).	8.50	725.00	6,162.50
9/11/24	PB	Prepare upcoming productions of custodial and centrally-maintained documents and correspondence regarding same (5.0); revise draft discovery requests to Whinstone US, Inc. regarding motion to assume (0.8)	5.80	725.00	4,205.00
9/11/24	SR	Continue conducting document review of potentially privileged documents.	8.30	650.00	5,395.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/11/24	HM	Attend teleconference with BA, JS, [redacted], and Charles Griffey of Peregrine to discuss data needed for ERCOT expert analysis (1.1); review and revise notes from meeting with Charles Griffey and circulate action items to BA and JS (0.5); continue revising and drafting Debtors' requests for admission, set one to Whinstone US, Inc. (3.3); draft Debtors' subpoena to Priority Power Management LLC and circulate to Stris & Maher and Lehotsky Keller Cohn teams (1.5); draft interrogatory about Whinstone's understanding of "Ercot market profitability (0.2); confer with PB and CH over email about how producing contracts at issue and then sending them to Charles Griffey (0.5).	7.10	600.00	4,260.00
9/11/24	PNY	Review assigned document batches (6.0).	6.00	480.00	2,880.00
9/11/24	TT	No Charge - Review [redacted] (0.9); review and analyze Debtors' Motion to Assume Executory Contracts with Whinstone (0.9); review Voluntary Petition for Chapter 11 Bankruptcy to assist with deposition preparation (0.9); review Declaration of David M. Dunn [redacted] (0.9).	3.60	480.00	N/C
9/11/24	VA	Review assigned document batches (8.0).	8.00	480.00	3,840.00
9/11/24	HS	Review assigned document batches (8.5).	8.50	480.00	4,080.00
9/11/24	FF	Review assigned document batches (10.0).	10.00	480.00	4,800.00
9/11/24	CHH	Review and analyze new client documents and update discovery database with same for document production (0.8); implement additional privilege highlighting (0.2); review documents in potential third production and pull potentially privileged ones for further review (0.6); review and edit list of correspondence between Whinstone and Rhodium regarding [redacted] (0.8); summarize correspondence from and to Whinstone in Whinstone's document production in email memorandum to JS in preparation for [redacted] (0.4); telephone call with [redacted] (0.3); begin reviewing [redacted] (Rhodium) emails for deposition preparation efforts (0.5).	3.60	325.00	1,170.00
9/11/24	JH	Continue reviewing documents to assist with Rhodium witness deposition preparation.	5.00	325.00	1,625.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/11/24	ASA	Review documents for JS to assist with preparation for forthcoming depositions of [redacted].	2.50	325.00	812.50
9/12/24	PS	Review emails regarding discovery (0.2).	.20	1250.00	250.00
9/12/24	BA	Correspond with litigation team regarding Imperium subpoena and with S. Lemmon to set up call (0.1); confer with JS and S. Lemmon regarding Imperium subpoena and related matters (0.6); confer with JS regarding same (0.1); review, draft, and revise affirmative discovery, including interrogatories, requests for admission, and requests to produce, and correspond with litigation team, bankruptcy counsel, and client regarding same, and as needed to oversee finalization of same, as well as related second production to Whinstone (5); correspond with client regarding [redacted] issues and [redacted] (0.6); correspond with C. Griffey regarding affirmative discovery needs (0.3); review and revise 3d party subpoena to Priority and correspond with client and litigation team as needed to oversee finalization of same (0.4).	7.10	1050.00	7,455.00
9/12/24	JS	Confer with BA and S. Lemmon regarding [redacted] subpoena and related matters (0.6); confer with BA regarding same (0.1); review, revise, and finalize RFAs, RFPs, and Rogs and associated exhibits (5.8); review and evaluate potential MSJ (1.4) and confer with W. Thompson regarding same (0.3); confer with potential safety expert and evaluate need for same (1.5).	9.70	875.00	8,487.50
9/12/24	CS	Review and analyze documents received from Whinstone relevant to [redacted] in anticipation of preparing him to be deposed.	7.00	725.00	5,075.00
9/12/24	PB	Call with expert T. Lewis regarding scope of upcoming damages report and follow-up correspondence regarding same (0.9); revise draft requests for admission to Whinstone US, Inc. regarding motion to assume (1.2); compile and prepare documents for production (2.6); call with J. Stokes regarding requests for admission (0.2).	4.90	725.00	3,552.50
9/12/24	SR	Continue conducting document review of potentially privileged documents (1.3); correspond with PB regarding status of the same (0.1); begin reviewing case materials in connection with preparations for [redacted] deposition (5.3).	6.70	650.00	4,355.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/12/24	HM	Attend document review daily team meeting (0.3); confer with VA, HS, PN, and FF via email about document tagging protocol (0.5); revise, finalize, and serve Debtors' intent to issue subpoena to Priority Power Management, form subpoena, and attachment to Whinstone US, Inc. (2.5); revise, finalize, and serve Debtors' requests for production, set two to Whinstone US, Inc.; revise, finalize, and serve Debtors' requests for admission, set one to Whinstone US, Inc. (3.3); confer with CH to create exhibits packet related to Debtors' requests for admission, set one to Whinstone US, Inc. (0.7); revise, finalize, and serve Debtors' interrogatories, set one to Whinstone US, Inc. (2.6).	9.90	600.00	5,940.00
9/12/24	PNY	Attend document review daily team meeting (0.3); review assigned document batches (9.7).	10.00	480.00	4,800.00
9/12/24	VA	Attend document review daily team (0.3); review assigned document batches (9.7).	10.00	480.00	4,800.00
9/12/24	HS	Attend document review daily team meeting (0.3); review assigned document batches (9.0).	9.30	480.00	4,464.00
9/12/24	FF	Attend document review daily team meeting (0.3); review assigned document batches (9.7).	10.00	480.00	4,800.00
9/12/24	CHH	Review and summarize P. Richison (Rhodium) documents in preparation for deposition (4.0); ingest various documents into discovery database for production (0.5); prepare, finalize, and run production set two (1.0); finalize various discovery requests (1.0).	6.50	325.00	2,112.50
9/12/24	JH	Continue document review to issue-tag emails [redacted] sent to or from [redacted].	2.00	325.00	650.00
9/12/24	ASA	No Charge - Submit inquiries and converse with hotel staff at properties in downtown Houston to find suitable accommodations for counsel and client during bankruptcy proceedings in November.	.80	325.00	N/C
9/13/24	EB	Review draft text message collection consulting engagement rider (0.1); correspond with BA and HM regarding revisions to same (0.1); review and begin proposing revisions to witness preparation [redacted] (1.0); correspond with JS and HM regarding same (0.1).	1.30	1100.00	1,430.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/13/24	VO	Attend zoom meeting with JS, P. Tomasco, members of Province, and counsel for [redacted] entities (0.8); confer with JS to get update, discuss progress on discovery, assignments, and next steps (0.7).	1.50	875.00	1,312.50
9/13/24	JS	Attend teleconference with co-counsel and P. Rosenblatt regarding subpoena and information request (0.7); attend teleconference with VO regarding discovery status and next steps (0.7); evaluate Foley correspondence regarding planned depositions and next steps in light of same (1.0); continue preparation for [redacted] depositions (4.3).	6.70	875.00	5,862.50
9/13/24	CS	Meet with SR to discuss progress on preparing materials to prepare Rhodium witnesses for depositions (0.3); continue reviewing and analyzing documents relevant to [redacted] in anticipation of preparing him for his deposition (6.0); continue drafting outline to prepare [redacted] to be deposed (0.9).	7.20	725.00	5,220.00
9/13/24	PB	Lead daily call with document review associate team regarding responsiveness review (0.2); quality-control review, analysis, and preparation of third, fourth, and fifth productions of documents to Whinstone (6.3).	6.50	725.00	4,712.50
9/13/24	SR	Continue reviewing case materials in connection with preparations for B. Cottrell deposition (5.0); attend videoconference with CS to discuss the same (0.1).	5.10	650.00	3,315.00
9/13/24	HM	Attend document review daily team meeting (0.2); perform quality check review of assigned batches (2.0).	2.20	600.00	1,320.00
9/13/24	TT	Conference with PB regarding assignement to analyze outside investor provisions in subscription and operating agreements (0.2); review Amendment to First Amended Operating Agreement for Rhodium 30MW (0.2); review Subscription Agreement for Rhodium 30MW (1.0); review Rhodium 30MW First Amended Operating Agreement (1.0); review Whinstone's Supplemental Reply in Support of Emergency Motion (0.5); review Hosting Agreement between Whinstone and Rhodium 30MW (1.5).	4.40	480.00	2,112.00
9/13/24	VA	Attend document review daily team (0.2); review assigned document batches (6.8).	7.00	480.00	3,360.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/13/24	HS	Attend document review daily team meeting (0.2); review assigned document batches (4.1).	4.30	480.00	2,064.00
9/13/24	FF	Attend document review daily team meeting (0.2); review assigned document batches (7.8).	8.00	480.00	3,840.00
9/13/24	CHH	Review and summarize [redacted] (Rhodium) produced documents in preparation for depositions.	5.00	325.00	1,625.00
9/13/24	JH	Finish document review to issue-tag emails [redacted] (5.0); correspond with AA regarding same (0.1); file new docket entries (0.3).	5.40	325.00	1,755.00
9/13/24	ASA	Continue review of client documents to assist JS with preparation for forthcoming depositions of Rhodium [redacted].	3.00	325.00	975.00
9/14/24	PS	Confer with JS regarding plan for offensive and defensive depositions.	.70	1250.00	875.00
9/14/24	EB	Review and respond to correspondence from JS regarding further revisions to deposition [redacted].	.10	1100.00	110.00
9/14/24	JS	Review and evaluate plan for offensive and defensive depositions (0.5); confer with PS regarding same (0.7); attend teleconference with W. Thompson regarding same and MSJ strategy (0.6).	1.80	875.00	1,575.00
9/14/24	HM	Correspond with JS regarding potential deposition witnesses (0.1); complete performing quality check of assigned batches (2.1); continue drafting Debtors' responses to Whinstone's requests for production (0.4).	2.60	600.00	1,560.00
9/14/24	PNY	Review assigned document batches (8.0).	8.00	480.00	3,840.00
9/15/24	PB	Prepare custodial and collected financial documents for inclusion in third, fourth, and fifth productions of documents.	1.40	725.00	1,015.00
9/15/24	HM	Begin quality check of additional document batches (1.9).	1.90	600.00	1,140.00
9/16/24	PS	Confer with JS regarding trial strategy.	1.40	1250.00	1,750.00
9/16/24	EB	Advise AA and correspond with Stris team, clients, and co-counsel regarding trial accommodations and planning.	.40	1100.00	440.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/16/24	BA	Correspond with JS, PB, and HM regarding status of discovery matters and communications with opposing counsel (0.2); confer with JS regarding pending discovery, proposed depositions, motion practice, and [redacted] (0.7); participate in teleconference with [redacted], J. Cohn, W. Thompson, [redacted], and [redacted] to discuss potential [redacted], confer with [redacted] regarding same, prepare analysis of issues relevant to same, and correspond with J. Cohn and with [redacted] regarding same (2.2); review proposed edits on protective order from Whinstone and HM's analysis of same, correspond with bankruptcy counsel and litigation team regarding response to same, and correspond with Whinstone regarding position on same (0.8); review plan from P. Brody for documents for expert T. Lewis and approve same (0.1); review proposed revision to vendor Setec's engagement letter and approve same (0.1); correspond with litigation team regarding Whinstone's proposed deposition list (0.1); review and revise deficiency letter to Whinstone regarding production (0.4); begin reviewing Whinstone's response to motion to assume (0.3).	4.90	1050.00	5,145.00
9/16/24	JS	Confer with BA regarding discovery status and next steps and related matters (0.7); review and evaluate draft deficiency letter regarding Whinstone productions (0.6); review and evaluate Foley edits to protective order (0.4); review and evaluate Whinstone response to motion to assume (1.7); confer with W. Thompson regarding same (0.7); confer with PS regarding trial strategy (1.4).	5.50	875.00	4,812.50
9/16/24	CS	Continue drafting motion for partial summary judgment and review case law relevant to the same.	6.90	725.00	5,002.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/16/24	PB	Lead daily strategy teleconference with discovery associate team regarding production issues (0.2); follow-up teleconference with H. Marsh and C. Huang regarding production sequencing and finalization (0.2); prepare documents for inclusion in fourth and fifth productions (5.7); teleconference with [redacted] HM, and CH regarding responses to Whinstone requests for Bitcoin mining data (0.8); teleconference with [redacted] HM, and CH regarding financial data for production (0.2); revise draft responses and objections to Whinstone's requests for production (1.0).	8.10	725.00	5,872.50
9/16/24	SR	Begin reviewing and analyzing witness preparation [redacted] in connection with [redacted] deposition (2.0); continue preparing for the same (1.5).	3.50	650.00	2,275.00
9/16/24	HM	Complete quality check of additional batches (3.6); attend document review daily team meeting (0.1); confer with PB and CH about privilege review protocol (0.4); attend portion of teleconference about [redacted] (0.5); attend teleconference with [redacted] and PB and CH to discuss financial information for discovery purposes (0.2); continue drafting Debtors' responses to Whinstone's requests for production (2.5); revise draft deficiency letter in response to Whinstone's document productions (1.2); revise and send updated contract rider to Todd Stefan of Setec Investigations (0.2).	8.70	600.00	5,220.00
9/16/24	PNY	Attend document review daily team meeting (0.2); review assigned document batches (7.8).	8.00	480.00	3,840.00
9/16/24	TT	Review and analyze Rhodium Private Placement Memorandum (2.0); correspond with PB regarding analysis of Amendment to First Operating Agreement; First Amended Operating Agreement; Subscription Agreement; Whinstone Supplemental Reply; Hosting Agreement between Whistone and Rhodium JV LLC (5.0).	7.00	480.00	3,360.00
9/16/24	VA	Attend document review daily team meeting (0.2); review assigned document barches (7.8).	8.00	480.00	3,840.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/16/24	HS	Review and analyze privilege protocol to prepare for privilege review (0.3); conduct privilege review and redaction of assigned batch (5.2).	5.50	480.00	2,640.00
9/16/24	FF	Attend document review daily team meeting (0.2); review assigned document batches (7.8).	8.00	480.00	3,840.00
9/16/24	CHH	Daily document review check-in with HM, PB, and discovery associates (0.1); confer with PB and HM regarding privilege review and setup of same (0.4); set up same (1.5); prepare potential production set five and quality control batches for same (1.5); edit production parameters in light of protective order to ensure compliance (0.5); draft memorandum on production protocol and quality control steps for same (2.0); attend teleconference with PB, HM, and Rhodium contacts regarding [redacted] data (0.7); attend teleconference with PB, HM, and Rhodium contacts regarding financial information document collection (0.2).	7.00	325.00	2,275.00
9/16/24	JH	Correspond with AA regarding ongoing document review of e-mail correspondence [redacted] in production sets (0.2); update docket for bankruptcy matter [redacted] (0.2).	.40	325.00	130.00
9/16/24	ASA	Assist HM and EB with finalization of agreement with Setec (0.1); continue review of assigned documents to assist JS with deposition preparation (3.2).	3.30	325.00	1,072.50
9/17/24	PS	Confer with JS regarding trial strategy.	1.00	1250.00	1,250.00
9/17/24	EB	Correspond with [redacted] regarding [redacted] (0.1); attend teleconference with [redacted] regarding same (0.3); correspond with Stris team to advise regarding same (0.1); correspond with BA, JS, and [redacted] regarding upcoming depositions (0.1); review and respond to team correspondence including regarding meeting to discuss same and high priority action items (0.1).	.70	1100.00	770.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/17/24	BA	Correspond with HM and with bankruptcy counsel regarding protective order (0.1); prepare for and participate in call with [redacted] regarding Whinstone demands for Rhodium employee information, and to update [redacted] on deposition and trial preparation, and convey update on same to JS, HM, and PB (0.6); review and revise RFP responses and correspond with HM and PB regarding same (0.5); confer with VO and W. Thompson regarding work product and [redacted] issues (0.5); confer with JS, HM, and PB regarding high priority action items, including document review and production and discovery responses (0.7); review subpoena to Rhodium from third parties and correspond with PB, HM, and JS regarding same (0.2).	2.60	1050.00	2,730.00
9/17/24	VO	Confer with W. Thompson regarding timeline materials for P. Tomasco (0.2); confer with W. Thompson and BA regarding same (0.5)	.70	875.00	612.50
9/17/24	JS	Review and revise deficiency letter (0.9) and confer with A. Swartz regarding same (0.1); confer with W. Thompson regarding MSJ strategy and next steps (0.3); attend teleconference with BA, PB, and HM regarding outstanding discovery and related issues (0.7); confer with PS regarding trial strategy (1.0); correspond with Stris and LKC teams regarding deposition strategy and planning (0.4).	3.40	875.00	2,975.00
9/17/24	CS	Review and analyze Rhodium's preliminary response to motion to assume contracts (0.9); continue drafting motion for partial summary judgment (4.3); draft declaration in support of motion for partial summary judgment (0.9).	6.10	725.00	4,422.50
9/17/24	PB	Review and analyze Whinstone response to motion to assume (1.1); teleconference with A. Swartz regarding motion to assume and document review status and strategy (0.3); analyze, prepare, and finalize document productions 3, 4, and 5 (5.0); revise engagement letter for damages expert T. Lewis (0.3); teleconference with BA, JS, and HM regarding discovery status and strategy (0.8)	7.50	725.00	5,437.50
9/17/24	SR	Continue reviewing case materials and notes to continue preparing for B. Cottrell deposition.	5.30	650.00	3,445.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/17/24	HM	Attend document review daily team meeting (0.4); revise Debtors' responses to Whinstone's requests for production (0.8); perform quality check of assigned batches (6.8); confer with HS, VA, FF, and PN over email about second-level privilege review and conduct research on [redacted] related to privilege (1.0); attend teleconference with PB, JS, and BA to discuss outstanding discovery items, privilege questions, and the response to the motion to assume (0.7); confer with PB over telephone about second-level privilege review (0.3).	10.00	600.00	6,000.00
9/17/24	PNY	Attend document review daily team meeting (0.4); review assigned document batches (3.6).	4.00	480.00	1,920.00
9/17/24	VA	Attend document review daily team meeting (0.4); review assigned document batches (7.6).	8.00	480.00	3,840.00
9/17/24	HS	Attend document review daily team meeting (0.4); review assigned document batches (7.6).	8.00	480.00	3,840.00
9/17/24	FF	Attend document review daily team meeting (0.4); review assigned document batches (7.6).	8.00	480.00	3,840.00
9/17/24	CHH	Finalize and run production sets 3 and 4 (4.2); daily check-in with PB, HM, and discovery associates regarding document review and next steps for privilege review (0.4).	4.60	325.00	1,495.00
9/17/24	JH	Update bankruptcy docket.	.50	325.00	162.50
9/17/24	ASA	Continue review and tagging of [redacted] emails as requested by JS to assist with deposition preparation (1.3).	1.30	325.00	422.50
9/18/24	EB	Review and propose revisions to E. Brown engagement letter (0.4); correspond with BA, VO, and JS regarding same and approval timing (0.1); review and approve revised version of same (0.1); attend teleconference with BA and JS regarding high priority discovery-related and strategic action items including RFP and interrogatory responses, expert reports, and trial coverage (0.5); attend teleconference with Stris & LKC Teams regarding Whinstone deponents and documents pertaining to preparation of Rhodium witnesses (1.0); review and correspond with BA and JS regarding revisions to correspondence to opposing counsel concerning deponents (0.1); attention to valuations document request (0.2).	2.30	1100.00	2,530.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/18/24	BA	Confer with JS regarding case strategy, including experts and depositions (0.2) and confer with JS and EB regarding same (0.5); participate in teleconference with litigation team to discuss depositions, trial witnesses, and communications with opposing counsel regarding same (1.0); confer with EB, JS, and VO regarding expert retentions (0.1); confer with PB regarding document review and production and RFP responses (0.9), and with PB and JS regarding same (0.1); correspond with PB and with HM regarding document review and production and RFP responses, and with PB, HM, and JS regarding same (0.4); convey potential analysis relevant to summary judgment filing to PB, HM, and JS (0.1); correspond with EB, HM, JS, and PB regarding strategy for RFP responses (0.1); review, draft, and revise RFP responses (3.2).	6.60	1050.00	6,930.00
9/18/24	VO	Attend portion of team deposition planning call (0.5); confer with JS and [redacted] regarding witness attendance at trial (0.4).	.90	875.00	787.50
9/18/24	JS	Confer with BA about [redacted] and trial (0.2); confer with BA and EB regarding same (0.5); attend team call regarding deposition strategy (1.0); review prior witness lists and disclosures and prepare deposition plan (1.5); review and evaluate motion for protective order (1.1); correspond with Foley regarding deposition planning and protective order (0.5); continue review of documents and outlining for [redacted] deposition prep (6.3); review and revise safety expert engagement letter (0.6) and correspond with BA and EB (0.3) and safety expert (0.5) regarding same.	12.50	875.00	10,937.50
9/18/24	CS	Participate in deposition strategy meeting (0.7); review and analyze edits to motion for partial summary judgment and continue revising the same (2.1); gather and organize exhibits in support of motion for partial summary judgment (0.6); continue reviewing analyzing documents relevant to [redacted] in anticipation of preparing him for his deposition (1.5).	4.90	725.00	3,552.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/18/24	PB	Attend daily review meeting with discovery associate team (0.3); review, finalize, and serve production 3 (1.1); attend teleconference with case team regarding offensive and defensive deposition strategy (1.0); teleconference with BA regarding responses to requests for production (0.6); prepare fourth and fifth productions of documents (1.6); review custodial documents of [redacted] for production and deposition preparation (3.1); client correspondence regarding final document collection items (0.4).	8.10	725.00	5,872.50
9/18/24	SR	Continue reviewing case materials and notes to prepare for [redacted] deposition (3.8); attend team call with EB, BA, JS, VO, PB, HM, JHA, AA, CH, and LKC team members to discuss deposition and witness strategy (0.7).	4.50	650.00	2,925.00
9/18/24	HM	Attend document review daily team meeting (0.3); attend portion of Stris & Maher LLP and Lehotsky Keller Cohn LLP litigation team call to discuss trial witness and deposition strategy (0.7); revise Debtors' responses to Whinstone's requests for production (6.4); begin quality check of assigned batches (1.2); confer with T. Stefan regarding processing of text messages for review and potential production (0.1).	8.70	600.00	5,220.00
9/18/24	PNY	Attend document review daily team meeting (0.3); review assigned document batches (7.7).	8.00	480.00	3,840.00
9/18/24	VA	Review assigned document batches (8.0).	8.00	480.00	3,840.00
9/18/24	HS	Attend document review daily team meeting (0.3); review assigned document batches (7.5).	7.80	480.00	3,744.00
9/18/24	FF	Attend document review daily team meeting (0.3); review assigned document batches (7.5).	8.00	480.00	3,840.00
9/18/24	MV	Attend document review daily team meeting (0.3); review assigned document batches (7.5).	3.00	400.00	1,200.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/18/24	CHH	Ingest various client financial documents into discovery database for review and production (0.2); update privilege highlighting to facilitate document review (0.1); create new privilege review sets for review (0.3); finalize production set 3 (2.0); emails with A. Swartz (Lehotsky) regarding documents for expert review (0.2); finish drafting [redacted] on [redacted] productions and privilege review and share same with PB and HM for further review (1.0); emails with JS and JHA regarding further review of [redacted] documents in preparation for depositions (0.1); teleconference with MV regarding discovery database and [redacted] (1.0); attend teleconference with VO, PB, JS, SR, EB, HM, CS, BA, ASA, JHA and Lehotsky Keller Cohn co-counsel (W. Thompson, A. Swartz, T. Disher, M. Frederick, J. Cohn) regarding deposition planning and witness list preparation (1.1).	6.00	325.00	1,950.00
9/18/24	JH	Begin expanded document review of e-mail correspondence sent to and from [redacted] (4.0); Attend teleconference with VO, PB, JS, SR, EB, HM, CS, BA, AA, CHH, JHA and Lehotsky Keller Cohn co-counsel (W. Thompson, A. Swartz, T. Disher, M. Frederick, J. Cohn) regarding deposition planning and witness list preparation (1.0); prepare notes for same (0.3).	5.30	325.00	1,722.50
9/18/24	ASA	Log recent developments in [redacted] at request of HM (0.5); continue review and tagging of documents to assist [redacted] with deposition preparation (3.0); No Charge - attention to case logistics and travel accommodations (0.5).	3.50	325.00	1,137.50
9/19/24	PS	Review summary judgment draft and provide initial comments.	.30	1250.00	375.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/19/24	EB	Call with BA (0.4); review and propose revisions to RFP responses (0.8); correspond with BA regarding same (0.1); further correspond with BA regarding implementation of same and advise PB regarding assignment for TT (0.1); attention to finalization of [redacted] including correspondence with PS, VO, JS, ASA, and [redacted] regarding same (0.2); confer with VO and review status update regarding retention application (0.1); review revised objections (0.1); propose further revisions to objections to [redacted] requests (0.3).	2.10	1100.00	2,310.00
9/19/24	BA	Correspond with A. Swartz and litigation team, and with [redacted], regarding contact information for subpoena targets (0.2); review update from [redacted] on [redacted], and correspond with [redacted] regarding same, including update on [redacted] (0.2); convey draft RFP responses to [redacted] (0.1); review suggested revisions to RFPs from K. Hutchins, correspond with litigation team regarding same, including format of responses, general objections, and consolidated versus separate responses, research propriety of general objections, confer with EB regarding strategy for RFP responses, including general objections and consolidated response, and correspond with K. Hutchins regarding recommended approach (2); correspond with PB regarding document production issues, review proposed cover letter for production, and approve same (0.2); correspond with PB regarding second day hearing and objections [redacted] (0.1); correspond with HM and team regarding revisions to RFP responses, review suggested revisions to same from EB, and correspond with EB regarding same (0.3); review and comment on draft responses to interrogatories prepared by HM and correspond with HM, PB, and JS regarding same (0.9); review and revise responses to requests for production (1.9); correspond with PB and JS regarding meet and confer request to Foley (0.1).	6.00	1050.00	6,300.00
9/19/24	VO	Confer with [redacted] regarding witnesses for trial (0.3); emails with JS, HM, and [redacted] regarding same (0.2).	.60	875.00	525.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/19/24	JS	Work on deposition outline for [redacted] deposition defense and review [redacted] and prior transcripts in connection with same (8.8); confer with CS regarding [redacted] draft (0.3); review same (0.5); further review and evaluate motion for protective order (0.5).	10.10	875.00	8,837.50
9/19/24	CS	Revise motion for partial summary judgment (3.5); meet with JS to discuss revisions to motion for partial summary judgment (.3).	3.80	725.00	2,755.00
9/19/24	PB	Analyze and prepare documents collected from Rhodium for production (1.8); review potentially-privileged documents and prepare production 6 (1.6); teleconference with [redacted] HM, and CS regarding miner data collection (0.3); teleconference with A. Swartz regarding expert strategy (0.3) analyze documents for deposition preparation of [redacted] (2.4).	6.40	725.00	4,640.00
9/19/24	SR	Continue reviewing case materials and notes to prepare for and outline [redacted] deposition.	7.00	650.00	4,550.00
9/19/24	HM	Attend document review daily team meeting (0.3); revise Debtors' responses to Whinstone's requests for production (0.7); draft Debtors' responses to Whinstone's first set of interrogatories (1.5); finish performing quality check of assigned batches (1.6).	4.10	600.00	2,460.00
9/19/24	PNY	Attend document review daily team meeting (0.3); review assigned document batches (7.7).	8.00	480.00	3,840.00
9/19/24	VA	Review assigned document batches.	8.00	480.00	3,840.00
9/19/24	HS	Attend document review daily team meeting (0.3); review assigned document batches (5.8).	6.10	480.00	2,928.00
9/19/24	FF	Review assigned document batches.	8.00	480.00	3,840.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/19/24	MV	Review [redacted] regarding privilege log requirements (0.5); correspondence with litigation team regarding [redacted] fields required for privilege log and next steps (0.5); continue review of defensive document review memorandum (0.5); review [redacted], per attorney instruction (0.5); review [redacted] privilege and issue tags and create saved search in preparation for privilege log (1.0); call with CH regarding search parameters and revise saved search for privilege log (1.0).	4.00	400.00	1,600.00
9/19/24	CHH	Attend teleconference with PB, HM, and Rhodium [redacted] regarding miner data collection (0.4); finalize production set 4 (2.6); prepare and finalize production overlays with additional custodian information for productions 1-3 (2.0); correspond with with [redacted] regarding same (0.1); correspond with PB regarding same (0.3); review and upload new client documents into database for production (0.3); correspond with MV regarding discovery tasks including privilege log (0.3); attend daily document review check-in with HM, PB, and discovery associates (0.2).	6.20	325.00	2,015.00
9/19/24	JH	Continue reviewing productions to identify materials for deposition preparation (3.5); review CHH memorandum regarding preparing production sets for service (1.0).	4.50	325.00	1,462.50
9/20/24	EB	Correspond with (0.1) and attend teleconference with (0.3) BA regarding further revisions to RFP responses; propose further revisions to same (0.1); correspond with BA and HM regarding finalization of same (0.1).	.60	1100.00	660.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/20/24	BA	Confer with EB regarding responses to requests for production (0.3); continue reviewing and revising responses to Whinstone's requests for production, correspond and confer as needed with HM, EB, JS, A. Davis, and PB to supervise finalization and service of same, and review near-final responses to approve service of same (4.2); confer with PB regarding discovery and production issues (0.3); correspond with HM and PB regarding document review and production (0.2); review and revise draft responses to interrogatories (0.8); correspond with AA and with M. Smith as necessary to assist with transferring documents and data to C. Griffey and correspond with C. Griffey regarding meeting (0.2); review Riot's response to subpoena and correspond with W. Thompson regarding same (0.2); correspond with team and Arbitrator regarding Arbitrator's request for update on status (0.1).	6.30	1050.00	6,615.00
9/20/24	JS	Continue deposition defense outlining and document review in connection with same (3.0); correspond with SR and CS regarding deposition prep status (0.1); attend teleconference with BA regarding discovery status and next steps (0.1); review [redacted] responses (0.3).	3.50	875.00	3,062.50
9/20/24	CS	Continue revising motion for summary judgment in response to comments from PS and JS (1.5); continue reviewing documents relevant to [redacted] and drafting outline of the same in anticipation of preparing him to be deposed (4.0).	5.50	725.00	3,987.50
9/20/24	PB	Teleconference with [redacted] regarding potential production issues (0.2); prepare fifth and sixth productions of documents and team correspondence regarding same (6.4); teleconference with BA regarding production preparation and responses to requests for production (0.2).	6.80	725.00	4,930.00
9/20/24	SR	Review temporary injunction hearing transcripts and exhibits to begin outlining list of relevant safety incidents and follow-up actions in connection with deposition preparations (7.0); correspond with CS and JS regarding the same (0.3).	7.30	650.00	4,745.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/20/24	HM	Attend document review daily team meeting (0.1); update log of expert materials (0.2); revise, finalize, and serve responses to Whinstone's first sets of RFPs (2.1); complete quality check of additional production documents (1.2); confer with T. Stefan (Setec), CH and PB about review of collected text messages (0.3).	3.90	600.00	2,340.00
9/20/24	PNY	Attend document review daily team meeting (0.2); review assigned documents including text message batches (7.8).	8.00	480.00	3,840.00
9/20/24	TT	Review and analyze transcripts of First Day Motions and April 2024 AAA Hearing to assist in preparation for depositions of [redacted].	2.00	480.00	960.00
9/20/24	VA	Review assigned document batches.	8.00	480.00	3,840.00
9/20/24	HS	Attend document review daily team meeting (0.1); review additional assigned documents (6.3).	6.40	480.00	3,072.00
9/20/24	FF	Attend document review daily team meeting (0.1); review assigned document batches (7.9).	8.00	480.00	3,840.00
9/20/24	MV	Revise saved search and search parameters for privilege log, further revise issue tags and fields for download of log, review and format draft log and required information fields (2.0); further review of [redacted] (0.5); draft [redacted] regarding privilege log (1.0); teleconference with PB regarding review of draft privilege log and further edits (0.5); create list of all Privilege tags [redacted] (0.5); further revise and review draft log, per attorney instructions (1.0).	5.50	400.00	2,200.00
9/20/24	CHH	Set up various QC searches for production sets 6 and 7 (0.5); collect hearing transcripts for client review in preparation for depositions (0.8); coordinate with QH to upload Whinstone's production sets into discovery platform for further review (1.0); emails with A. Swartz (Lehotsky) regarding same in anticipation of further offensive document review (0.1); emails with T. Stefan (Setec) regarding text message data collection and review (0.2); upload [redacted] text messages into database for further review and [redacted] (3.0); confer with PB regarding Whinstone complaints regarding initial document productions and troubleshoot same (0.6).	6.20	325.00	2,015.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/21/24	BA	Convey discovery correspondence to [redacted] and correspond with [redacted] regarding [redacted].	.10	1050.00	105.00
9/21/24	JS	Outline trial arguments and begin high-level order of proof outline.	2.90	875.00	2,537.50
9/21/24	PB	Preparation of custodial and collected documents for production to Whinstone and correspondence regarding same.	2.70	725.00	1,957.50
9/21/24	HS	Review assigned text message document batches.	3.10	480.00	1,488.00
9/22/24	EB	Correspond with BA, VO, and JS regarding inspection request and status of potential witness [redacted] (0.1); review materials concerning (0.2) and correspond with CS and PB regarding (0.1) versions of data center rules [redacted]; review and respond to correspondence with BA, VO, and JS regarding issues and positions in advance of upcoming meet and confer teleconference with opposing counsel (0.1).	.50	1100.00	550.00
9/22/24	BA	Research requests for inspection of premises under Rule 34, analyze issues with Whinstone's request, and convey analysis to litigation team (0.8); correspond with PB, JS, and HM regarding analysis of privilege issues with respect to document production (0.3); correspond with EB, VO, and JS regarding [redacted] and potential issues related to same, and regarding limits on number of depositions (0.2); confer with VO regarding [redacted] (0.1); research issues related to unavailable witnesses and correspond with EB, VO, and JS regarding same (0.3).	1.70	1050.00	1,785.00
9/22/24	VO	Prepare email to EB, BA, and JS regarding status of [redacted] (0.2); confer with BA regarding witness representation issues and emails with team regarding same (0.3).	.50	875.00	437.50
9/22/24	JS	Continue [redacted] deposition prep and outlining trial strategy in light of and in connection with same.	3.60	875.00	3,150.00
9/22/24	PB	Preparation of custodial and collected documents for production and team correspondence regarding same.	3.90	725.00	2,827.50

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9/23/24	PS	Prepare for (1.8) and confer with (0.4) JS and CS regarding motion for partial summary judgment.	2.20	1250.00	2,750.00
9/23/24	EB	Review and analyze case materials in support of expert support (1.0); prepare for (0.1) and attend (0.6) portion of teleconference with ERCOT expert; correspond with BA, JS, HM, and HJA regarding additional documents for ERCOT expert (0.1); review correspondence from opposing counsel concerning general objections and correspond with BA regarding response to same (0.1); correspond with BA, PB, and HM regarding tracking of materials sent to experts (0.2); attention to case management (0.1); correspond with BA and JS regarding response to discovery disputes concerning third party subpoenas and inspection requests (0.2); begin reviewing and commenting on draft interrogatory responses (0.9).	3.30	1100.00	3,630.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/23/24	BA	Review privilege question and correspond with PB regarding same (0.1); confer with JS regarding discovery matters and high priority action items (0.9); prepare for (0.4) and participate in teleconference (0.7) with expert C. Griffey; confer with CS, JS, and SR regarding strategy for deposition preparation and discovery correspondence, and correspond with SR regarding discovery correspondence (0.5); review discovery correspondence from Whinstone's counsel, and correspond with PB, EB, and JS regarding same (0.5); correspond with JS, PB, and HM regarding preparation for meet and confer with opposing counsel and review updates on same (0.4); confer with JS regarding strategy for discovery disputes, including deposition planning and request for inspection (0.5); correspond with [redacted] JH, and C. Griffey as needed to arrange upload of data and files (0.3); correspond with HM, EB, and JH regarding tracking of expert materials (0.2); correspond with PB and JS regarding Whinstone's demand for native word files and response to same (0.1); draft proposed response to Whinstone's counsel regarding request for inspection, convey same to team for review, [redacted], and email from Whinstone's counsel requesting update on same (0.8); review request from arbitrator regarding hearing dates and convey proposed response to bankruptcy counsel (0.1); continue reviewing and revising interrogatory responses (0.4).	5.80	1050.00	6,090.00
9/23/24	JS	Calls with BA regarding meet and confer issues, discovery status and next steps, and deposition preparation (1.5); attend videoconference with BA, CS, and SR regarding B. Cottrell and P. Richison deposition preparation and discovery response letter (0.5); Zoom with CS and PS regarding motion for summary judgment (0.4); prepare for and attend meet and confer with Foley regarding motion for protective order and depositions (4.0); evaluate next steps in light of meet and confer and prepare follow up correspondence and associated strategy in connection with same (4.0); evaluate outstanding document discovery issues and correspond with PB and BA regarding same (0.8).	11.60	875.00	10,150.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/23/24	CS	Attend videoconference with BA, JS, and SR regarding deposition preparation (0.5); meet with JS and PS to discuss motion for partial summary judgment (0.4); revise motion for partial summary judgment (2.1); review and analyze documents relevant to [redacted] and [redacted] in anticipation of preparing them for their depositions (2.1).	5.10	725.00	3,697.50
9/23/24	PB	Prepare production of documents related to [redacted] (0.8); prepare and finalize upcoming productions of custodial and collected documents in response to Whinstone requests for production (5.3); analysis of Whinstone positions regarding production of Word documents and correspondence regarding same (1.5); supervisory review potentially-privileged documents in preparation to draft privilege log and for production (1.8); prepare production of financial information and correspondence with client regarding same (1.2); review and analysis of [redacted] text messages for production (0.9); analysis of materials for expert use and transmission of same (1.0)	11.60	725.00	8,410.00
9/23/24	SR	Attend portion of videoconference with BA, JS, and CS regarding deposition preparations and outstanding discovery-related actions items (0.4); review and analyze discovery responses and related deficiency correspondence (6.1).	6.50	650.00	4,225.00
9/23/24	HM	Attend document review daily team meeting (0.3); attend teleconference with ERCOT expert C. Griffey, BA, EB, and JHA to regarding materials for analysis (0.6); attend meet-and-confer teleconference with JS and AA, and Whinstone's counsel (0.4); continue drafting and revising responses to Whinstone's first sets of interrogatories (2.5); begin reviewing and analyzing text messages of [redacted] (3.7); begin performing quality check of additional document batches (1.5).	9.00	600.00	5,400.00
9/23/24	PNY	Attend document review daily team meeting (0.3); review assigned document batches (7.7).	8.00	480.00	3,840.00
9/23/24	TT	Review and analyze transcripts of April 2024 AAA Hearing and March 2024 Temporary Injunction Hearing Volume 1 to assist in preparation for depositions of [redacted].	2.00	480.00	960.00
9/23/24	VA	Continue reviewing assigned documents.	8.00	480.00	3,840.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/23/24	HS	Attend portion of document review daily team meeting (0.2); continue reviewing assigned documents (5.0).	5.20	480.00	2,496.00
9/23/24	FF	Attend portion of document review daily team meeting (0.2); review assigned documents (7.8).	8.00	480.00	3,840.00
9/23/24	MV	Begin review of draft privilege log and identify entries for further attorney review (6.0); correspond with review team regarding sorting family documents (0.5); assist with sorting and saving of same in chronological order (0.5).	7.00	400.00	2,800.00
9/23/24	CHH	Assign various documents in discovery database to discovery associates for further review (0.2); set up review set containing redacted documents coded for production for further quality checks (0.3); review correspondence with opposing counsel and update internal production log accordingly (0.1); update document collection memorandum to keep track of documents collected for production (0.2); daily document review check-in with HM and discovery associates (0.2); review and analyze potential documents for production set eight and identify issues with same for PB further review (0.5); prepare production 5 for production (2.6); review [redacted] (Rhodium) documents in preparation for deposition (2.0).	6.10	325.00	1,982.50
9/23/24	JH	Prepare ShareFile folder with relevant contracts, pleadings in the bankruptcy and arbitration dockets, and rhodium usage data for expert C. Griffey's review at BA request (2.0); attend teleconference with BA, EB, HM, JS, and expert Charles Griffey to review [redacted] for his upcoming expert report (0.8); prepare notes for the same (0.7); request transcript of [redacted] status conference for HM (0.9).	4.40	325.00	1,430.00
9/23/24	ASA	Attend meet and confer with JS, HM, and opposing counsel (0.4); record notes and circulate with team (0.1); attention to contact list and [redacted] (1.5).	2.00	325.00	650.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/24/24	EB	Review correspondence to opposing counsel on various discovery issues and correspond with BA and JS regarding revisions to same (0.1); begin reviewing and analyzing materials for ERCOT and damages experts (2.8); correspond with PB regarding same and upcoming teleconference with damages expert (0.1); correspond with BA regarding verification of interrogatory responses (0.1).	3.10	1100.00	3,410.00
9/24/24	BA	Review and analyze issues relating to text message production and correspond with PB regarding same (0.4); correspond with JS, EB, W. Thompson and team regarding [redacted] Whinstone's late request for inspection (0.3); correspond with Arbitrator regarding hearing dates (0.1); correspond with JS regarding issues for weekly client/counsel call (0.1); participate in teleconferences with client team and client team, litigation and bankruptcy counsel, to discuss alleged issues and action items including [redacted] (1.7); correspond with JS regarding response to Whinstone's counsel on multiple discovery matters (0.2); continue reviewing and revising interrogatory responses, correspond with PB regarding same, and convey draft of same to client for review (2.6); correspond with JS, HM, and PB regarding materials provided to expert witness E. Brown and production of same (0.1); correspond with M. Smith regarding ERCOT data (0.2); review correspondence from JS to Whinstone's counsel regarding discovery matters (0.1).	5.80	1050.00	6,090.00
9/24/24	JS	Call with [redacted] regarding retention of safety expert (0.2); call with W. Thompson regarding outstanding discovery issues (0.4); zoom with client and attorney teams regarding Whinstone allegations of safety and OSHA issues (0.7); zoom with client and attorney teams regarding outstanding discovery issues and [redacted] (1.0); revise and prepare further correspondence to Foley regarding outstanding document discovery, deposition, and related issues (2.7); begin outlining issues for safety expert report (3.1); review and confer with [redacted] regarding document discovery [redacted] in connection with substantial completion deadline (0.4); review revised motion for partial summary judgment (0.4).	8.90	875.00	7,787.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/24/24	CS	Participate in meeting with client and legal team to obtain safety and maintenance update on issues raised in February 2024 letter from Whinstone (0.8); revise motion for partial summary judgment to incorporate feedback from JS and PS (2.2); review and analyze documents relevant to Brendan Cottrell in anticipation of preparing him for his deposition (4.4).	7.40	725.00	5,365.00
9/24/24	PB	Prepare production of documents regarding inter-company agreements (0.8); revise draft interrogatory responses (0.5); prepare production of corporate go-get documents (2.3); prepare production of bank statements (2.9); call with HM and T. Stefen regarding text message production (0.2); prepare seventh production of documents to Whinstone (1.3).	8.00	725.00	5,800.00
9/24/24	SR	Attend portion of videoconference with [redacted], LKC team, and Stris team to discuss safety, AUP, and OSHA allegations and site inspection request (0.7); draft correspondence in response to Sept. 23 correspondence from opposing counsel regarding discovery deficiencies (3.9).	4.60	650.00	2,990.00
9/24/24	HM	Attend document review daily team meeting (0.1); attend portion of teleconference with Stris, LKC, and Rhodium regarding safety allegations (0.7); complete quality check of additional documents (3.8); attend teleconference with A. Davis, AA, and J. Ledoux regarding response to subpoena (0.4); draft summary of same for BA, JS, PB, A. Swartz, W. Thompson, M. Rothrock, and A. Davis (0.4); attend teleconference with T. Stefan (Setec) regarding processing and review of text messages (0.4).	5.80	600.00	3,480.00
9/24/24	TT	Review and analyze transcripts of Temporary Injunction Hearings Vol 1 and Vol 2 to assist in preparation for depositions of [redacted].	1.50	480.00	720.00
9/24/24	MV	Continue review of draft privilege log and document potential issues and questions for further discussion with attorney, teleconference with attorney regarding the same (1.0); continue revisions and format fields on draft privilege log (3.0); revise [redacted] privilege tags on draft log (3.0).	7.00	400.00	2,800.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/24/24	CHH	Finalize productions 5 and 6 (2.0); prepare potential production 8 for attorney QC (1.0); upload various client documents into discovery database for further review and production (0.2); emails with [redacted] regarding [redacted] redaction [redacted] (0.1); review discovery database for potentially privileged financial documents and confer with HM regarding same (0.2); review [redacted] (Rhodium) documents in preparation for deposition (2.2); confer with PB regarding document redactions (0.1); set up further privilege reviews in preparation for privilege log (0.4).	6.20	325.00	2,015.00
9/24/24	JH	Update bankruptcy docket.	.90	325.00	292.50
9/24/24	ASA	Attend call with HM and J. Ledoux regarding subpoena compliance and prepare and circulate notes regarding same (0.5).	.50	325.00	162.50
9/25/24	PS	Review and revise latest draft partial summary judgment motion.	1.90	1250.00	2,375.00
9/25/24	EB	Confer with BA regarding proposed verification language and exemplars (0.1); attend portion of teleconference with BA, JS, HM, LKC, and [redacted] regarding interrogatory responses (0.6); review and analyze materials for ERCOT and Damages experts (1.0).	1.70	1100.00	1,870.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/25/24	BA	Participate in teleconference with PB, HM, and Stoneturn expert team to discuss forthcoming opinions and document/data needs (0.9); prepare for (0.2) and participate in teleconference with client team and litigation team to review and discuss [redacted] (1.1); confer with PB, [redacted] regarding interrogatory responses (0.7); confer with PB regarding production and discovery matters (0.2); correspond with HM regarding third party subpoenas and protective order (0.1); review discovery correspondence from Whinstone's counsel and correspond with JS and litigation and bankruptcy counsel regarding strategy for responding to same, including [redacted] (0.5); correspond with EB regarding interrogatory verification language, review exemplars of same, convey same to [redacted] for review, and convey same to bankruptcy counsel for review (0.3); correspond with JS regarding interrogatory responses and discovery matters (0.3); correspond with HM regarding document collection for C. Griffey (0.2).	4.70	1050.00	4,935.00
9/25/24	JS	Draft and review correspondence and evaluate strategy on high-priority discovery issues (7.4); review and revise introduction to motion for summary judgment (1.5); zoom with attorney and client teams regarding [redacted] responses (1.0); zoom with Stris and LKC teams regarding Whinstone production deficiencies and text messages (0.7); evaluate possible summary judgment arguments regarding [redacted] (2.5).	13.10	875.00	11,462.50
9/25/24	CS	Review and analyze documents relevant to [redacted] in anticipation of preparing him for his deposition and continue drafting outline of the same (6.1); review and analyze transcript of [redacted] testimony during March 1, 2024 hearing (2.0).	8.10	725.00	5,872.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/25/24	PB	Teleconference with C. Huang regarding native Word document production (0.4); prepare productions of documents in anticipation for substantial completion deadline (5.5); attend discovery teleconference with client executive team regarding status and responses to interrogatories (1.0); attend follow-up call with [redacted] regarding financial document discovery (1.0); further follow-up teleconference with [redacted] regarding data requests (0.8); teleconference with expert T. Lewis and team regarding financial expert report (0.9).	9.60	725.00	6,960.00
9/25/24	SR	Revise and incorporate JS comments in draft correspondence in response to Sept. 23 correspondence from opposing counsel regarding discovery deficiencies (3.2); correspond with team regarding the same (0.1).	3.30	650.00	2,145.00
9/25/24	HM	Update EB regarding status and high priority action items (0.4); organize and refine expert materials folders (0.4); update expert materials log (0.5); attend teleconference with PB, BA, and Stoneturn to discuss materials and information needed for expert report (0.8); draft and send email to [redacted] regarding collection of [redacted] (0.1); attend teleconference with BA, PB, EB, JS, and Rhodium team to discuss [redacted] responses (1.1); attend portion of teleconference with A. Swartz, W. Thompson, JS, and M. Rothrock to discuss deficiency letter (0.4); review and respond to team correspondence regarding remaining discovery and upcoming substantial completion deadline (1.5); review, analyze, and prepare documents for ERCOT expert C. Griffey (3.1); confer with PB about final productions of documents (0.5); correspond with counsel for Priority Power Management and J. Ledoux about protective order (0.3); review and respond to correspondence with discovery associates about remaining document review tasks (1.2).	10.30	600.00	6,180.00
9/25/24	PNY	Review assigned document batches.	2.00	480.00	960.00
9/25/24	TT	Review and analyze transcript of Temporary Injunction Hearing Vol 2 to assist in preparation for depositions of [redacted].	1.50	480.00	720.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/25/24	VA	Review assigned privilege review batches.	8.00	480.00	3,840.00
9/25/24	HS	Review assigned privilege review batches.	4.20	480.00	2,016.00
9/25/24	FF	Review assigned privilege review batches.	8.00	480.00	3,840.00
9/25/24	MV	Continue revising draft privilege log [redacted] (2.0); continue highlighting of document entries for further attorney review [redacted] (2.0); edit template fields [redacted] (0.5).	4.50	400.00	1,800.00
9/25/24	CHH	Review correspondence between team and [redacted] (Rhodium) regarding further document collection and facilitate same (0.2); set up further rounds of privilege review and confer with HM and PB regarding same (0.5); upload various client documents into discovery database in preparation for production (0.3); create various searches of documents marked for [redacted] attorney review (0.3); set up final checks for production set 7 and finalize same in conference with PB (2.0); email with PB regarding production 8 set up (0.2); emails with discovery associates regarding privilege review (0.2); [redacted] finalize production set 6 (1.0); emails with HM and QH regarding Whinstone's fifth production (0.2); review [redacted] (Rhodium) documents in preparation for depositions and confer with CS regarding same (1.0).	5.90	325.00	1,917.50
9/26/24	EB	Review response to deficiency letter (0.1); correspond with BA and JS regarding same and [redacted] (0.1); attention to case management (0.4); review proposed verification language from K. Hutchins and correspond with BA regarding same (0.1); review and correspond with BA regarding further revised interrogatory responses (0.5).	1.20	1100.00	1,320.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/26/24	BA	Correspond with JS and EB regarding strategy for response to Whinstone's inspection demand and review Whinstone's motion regarding same (0.6); correspond with JS, EB, and team regarding response to Whinstone's deficiency letter and [redacted] (0.3); correspond with HM regarding transmittal of documents to C. Griffey and with M. Smith regarding call with C. Griffey (0.1); continue reviewing and revising interrogatory responses, correspond with SR and PB regarding revisions to same, confer with PB regarding strategy for same, correspond with litigation team and with bankruptcy counsel regarding same, including verification and [redacted] responses (2.5); confer with JS regarding opposition to inspection request, convey research to JS, review draft of opposition, and correspond with JS and team regarding same (0.4); confer with PB regarding status of outgoing productions and substantial completion (0.4); correspond with [redacted] regarding data for C. Griffey and correspond with JS regarding same (0.1); review draft deficiency letter to Whinstone (0.1); begin reviewing Whinstone's responses to RFPs (0.2).	4.70	1050.00	4,935.00
9/26/24	VO	Review and evaluate draft letter to [redacted] (0.1); emails with [redacted] regarding same (0.1); review [redacted] email response to [redacted] (0.3); prepare proposed revisions to letter (0.2); prepare email to [redacted] regarding same (0.2); confer with CS to assist with preparation for defensive deposition of [redacted] (0.3).	1.20	875.00	1,050.00
9/26/24	JS	Attend videoconference with E. Brown and Stris team regarding safety expert report (0.2); prepare preliminary draft outline of same (2.1); attend teleconference with BA regarding response to Whinstone deficiency letter (0.1); revise draft response to same and finalize same for service (1.0); draft further high priority discovery correspondence (2.5); prepare opposition to Whinstone emergency motion for status conference (3.4); attend teleconfrence with CS regarding motion for summary judgment and trial strategy (0.3); evaluate potential summary judgment arguments regarding Whinstone defaults (2.0); prepare witness list for exchange with Whinstone (0.5).	12.10	875.00	10,587.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/26/24	CS	Participate in call with expert E. Brown regarding expert report (0.2); revise motion for partial summary judgment (0.7); draft proposed order granting motion for partial summary judgment (0.3); review Whinstone's emergency motion for hearing on discovery dispute (0.3); review and revise opposition to emergency motion for hearing on discovery dispute (0.3); continue reviewing and analyzing transcript of [redacted] prior testimony (1.4); meet with VO regarding [redacted] prior testimony (0.3); meet with JS to discuss motion for partial summary judgment (0.3); continue reviewing and analyzing documents relevant to [redacted] in anticipation of preparing him for his deposition (3.7).	7.50	725.00	5,437.50
9/26/24	PB	Update EB regarding expert discovery status (0.3); prepare eighth, ninth, tenth, and eleventh productions of documents (7.8); teleconference with B. Asay regarding same (0.3); teleconference with K. Pritchard and A. Galbraith regarding production issues (0.4); analyze and compile documents for analysis by potential expert T. Lewis (1.0).	9.80	725.00	7,105.00
9/26/24	SR	Review and revise interrogatory responses.	5.50	650.00	3,575.00
9/26/24	HM	Attend document review daily team call (0.1); review and respond to team correspondence regarding discovery to be produced by substantial completion date, September 26 (2.0); review and revise draft of motion for summary judgment (0.5); complete reviewing and analyzing documents to send to Charles Griffey for his ERCOT expert analysis (2.5); update [redacted] (0.4); organize and refine [redacted] (0.2); confer with PB about document production (0.5); review and analyze text messages of [redacted] (0.5); review and analyze documents related to the purchase of new miners for document production (1.4); review and revise Rhodium-Whinstone Witness Preparation slide deck and case themes (1.2); review response to Whinstone's emergency motion for hearing (0.3); review and analyze Whinstone's responses to Debtors' RFPs - Set One (0.8).	10.40	600.00	6,240.00
9/26/24	PNY	Review assigned document batches.	2.00	480.00	960.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/26/24	TT	Review and analyze transcript of Temporary Injunction Hearing Vol 2 to assist in preparation for depositions of [redacted]	2.20	480.00	1,056.00
9/26/24	VA	Review assigned privilege review batches.	8.00	480.00	3,840.00
9/26/24	HS	Review assigned privilege review batches.	3.40	480.00	1,632.00
9/26/24	FF	Review assigned privilege review batches (7.8).	7.80	480.00	3,744.00
9/26/24	MV	Continue review of draft privilege log and highlight document entries for further attorney review and [redacted].	3.00	400.00	1,200.00
9/26/24	CHH	Document review check-in with HM, PB, and discovery associates (0.1); finalize and run productions 8, 9, and 10 (5.0); upload various client documents to document database for production (0.2); finalize [redacted] native productions and overlays for production sets 1, 3, 4, and 5 (1.0); summarize [redacted] (Rhodium) document review for CS [redacted] (0.3).	6.60	325.00	2,145.00
9/26/24	JH	Attend meeting with expert Eric Brown to discuss case updates and details regarding Brown's expert report with PB, CS and JS (0.3); confer with CHH and ASA regarding continued document review of Rhodium [redacted] emails found in document productions (0.5).	.80	325.00	260.00
9/26/24	ASA	Record material sent to expert Charles Griffey [redacted] at request of HM (0.3); review prior [redacted] email review efforts in light of request by JS to [redacted] (0.9); review [redacted] documents for responsiveness to assist JS with deposition preparation (2.0).	3.20	325.00	1,040.00
9/27/24	EB	Review correspondence from BA regarding ERCOT expert issues (0.1); begin analyzing same (0.2).	.30	1100.00	330.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/27/24	BA	Prepare for and attend teleconference with SD, [redacted] and C. Griffey and review and confirm notes regarding same (0.7); analyze issues relevant to energy credit and expert opinion of C. Griffey and convey same to PB, HM, JS, and EB (0.7); review drafts of opposition to Whinstone's inspection request, research Rule 26 issue for same, and correspond with JS, CS, JH, and team regarding same (0.8); correspond with PB and HM regarding information and revisions needed to finalize interrogatory responses, continue reviewing and revising same, review and confirm documents cited in support of same, oversee process for generating responses for each interrogated entity, correspond and confer with [redacted] regarding finalization [redacted] of same, review and approve near-final and final versions of same (4.5); correspond with PB and team regarding additional hash rate documents for production, additional production from Whinstone, and steps for checking and confirming final productions before final discovery deadline (0.3);correspond with A. Swartz regarding attendance at Monday's hearing (0.1); correspond with W. Thompson and A. Swartz, and with Whinstone's counsel R. Slovak, regarding representation of Lyle Theriot (0.3); review Whinstone's motion to remand Imperium suit (0.2); review transcript of [redacted] and convey same with analysis to [redacted] and [redacted] (0.4); review proposed email to Foley exchanging witness information and correspond with JS, PB, and HM regarding timing of same (0.1).	8.10	1050.00	8,505.00
9/27/24	JS	Review and revise response to Whinstone emergency motion (2.1); calls with CS (0.2) and P. Tomasco (0.2) regarding same; prepare and serve email regarding witness list exchange (0.8).	3.30	875.00	2,887.50
9/27/24	CS	Review and revise opposition to Whinstone's emergency request for hearing on request to inspect premises (2.8); email communications with client regarding the same (0.4); review and analyze case law and other legal authority in support of the same (1.0); review cite check of the same (0.3); review and analyze documents relevant to [redacted] in anticipation of preparing him for his deposition (2.4).	6.90	725.00	5,002.50
9/27/24	PB	Prepare twelfth production of documents (3.8); draft privilege log regarding documents produced to date (1.9); revise draft interrogatory responses (0.7).	5.60	725.00	4,060.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/27/24	HM	Revise, finalize, and serve Air HPC's, Jordan HPC's, Rhodium 10MW's, Rhodium 30MW's, and Rhodium Encore's responses to Whinstone's first set of interrogatories (7.5); update [redacted] (0.2); organize and refine [redacted] materials (0.2).	7.90	600.00	4,740.00
9/27/24	PNY	Review assigned privilege review batch.	2.00	480.00	960.00
9/27/24	TT	Review and analyze transcript of Motion for Temporary Injunction Vol 1 Dec 2023 to assist in preparation for depositions of [redacted].	2.00	480.00	960.00
9/27/24	VA	Review assigned privilege review batches.	8.00	480.00	3,840.00
9/27/24	FF	Attend document review daily team meeting (0.2); review assigned document review batches (7.8).	8.00	480.00	3,840.00
9/27/24	MV	Review database workflow and evaluate potential issues regarding data and production formatting (1.5); continue review of draft privilege log and address highlighted entries for further review (2.0); update [redacted] regarding same (1.0).	4.50	400.00	1,800.00
9/27/24	JH	Continue document review of productions 5 through 8 to identify materials for deposition preparation and trial (3.0); confer with PB regarding potential further review project (0.3); confer with SD to assist in finalizing expert meeting notes (0.5); cite-check draft response to Whinstone's motion for a status conference for CS (1.5).	5.30	325.00	1,722.50
9/27/24	SD	No Charge - Attend teleconference with BA and expert Charles Griffey (0.3); attend teleconference with JAH for introduction to the matter (0.2); research and draft notes over meeting (1.3).	1.80	325.00	N/C
9/28/24	EB	Attention to case management (0.4); review and respond to email from JS regarding high priority action items including expert reports (0.1).	.50	1100.00	550.00
9/28/24	JS	Evaluate and plan for high-priority tasks for October (3.1); prepare for status conference regarding Whinstone request for inspection (0.5).	3.60	875.00	3,150.00
9/29/24	JS	Review briefing and interrogatory responses and prepare argument in connection with discovery hearing preparation.	2.50	875.00	2,187.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/29/24	PB	Draft summary analysis of data productions for hearing preparation.	2.30	725.00	1,667.50
9/29/24	HM	Review and respond to team correspondence regarding document discovery and Whinstone's requested inspection of the premises (0.3).	.30	600.00	180.00
9/29/24	TT	Review and analyze prior transcripts in preparation to assist in preparation for depositions of [redacted] (1.5); correspond with PB regarding review and analysis of transcripts (2.5).	4.00	480.00	1,920.00
9/30/24	PS	Attend team call with PB, VO, EB, JS, and CS regarding workflow and case strategy.	.90	1250.00	1,125.00
9/30/24	EB	Attend portion of strategic planning teleconference with PS, BA, VO, JS, CS, and PB (0.7); review correspondence from JS regarding results of hearing and upcoming inspection (0.1).	.80	1100.00	880.00
9/30/24	BA	Review and comment on draft summary judgment motion and correspond with CS regarding research related to same and potential Whinstone termination theories (1.3); participate in teleconference with JS, P. Tomasco, M. Robinson and D. Dunn regarding potential D. Dunn trial testimony (0.5); attend portion of teleconference with JS, PS, EB, VO, CS, and PB to discuss strategic planning for pretrial and trial action items (0.7); participate in teleconference with JS and bankruptcy counsel to discuss status conference on inspection request (0.4); review and propose revisions to correspondence to opposing counsel regarding same (0.1); attend status conference with court (0.5); attend portion of teleconference with PB, HM, and JS to discuss resulting action items (0.6); correspond with A. Davis and HM regarding subpoena follow up (0.1).	4.20	1050.00	4,410.00
9/30/24	VO	Attend portion of Stris team teleconference regarding strategy, assignments, and next steps (0.8).	.80	875.00	700.00

Invoice # 14263 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/30/24	JS	Prepare for and attend meet and confer call with opposing counsel regarding depositions and inspection (1.8); prepare for discovery hearing regarding inspection and review document and Whinstone data requests in light of same (2.5); attend teleconference with D. Dunn, M. Robinson, P. Tomasco, BA, HM, and PB regarding potential trial testimony of D. Dunn (0.5); attend teleconference with P. Tomasco and BA regarding preparation for discovery hearing (0.4); attend discovery hearing (0.5); attend follow-up calls with [redacted] (0.1), P. Tomasco (0.2), and BA, HM, and PB (0.4) regarding next steps in light of outcome of hearing; prepare further correspondence regarding inspection and information requests from Whinstone (1.5); prepare for and attend Stris team planning call for high-priority October projects (0.9); review data produced in connection with [redacted] (0.8).	9.60	875.00	8,400.00
9/30/24	CS	Draft analysis of alleged breaches in April 22, 2024 notice of termination (5.1); participate in portion of team meeting regarding tasks necessary to prepare for trial (0.7); review and analyze material and begin outlining trial brief (2.4); review and analyze documents relevant to [redacted] deposition preparation (0.8).	9.00	725.00	6,525.00
9/30/24	PB	Prepare follow-up final productions of financial and custodial data (6.3); attend teleconference with Province team and co-counsel (0.5); attend teleconference with PS, VO, EB, JS, and CS regarding workflow and case strategy (0.9); attend court conference regarding inspection (0.6); attend portion of follow-up team call regarding same (0.4).	8.70	725.00	6,307.50
9/30/24	HM	Review and analyze communications and advise AA regarding updates to contact list and case management materials (5.0); attend teleconference with M. Robinson and D. Dunn (Province), BA, JS, PB, and P. Tomasco (Quinn Emanuel) (0.5); attend meet-and-confer teleconference with JS, BA, AA, and opposing counsel (0.6); review and respond to team correspondence regarding discovery matters and status conference (2.5); advise CH regarding updates to production log and document collection memorandum (1.0); attend team teleconference to discuss inspection of Rockdale facility (0.5).	10.10	600.00	6,060.00

Stris & Maher LLP

Invoice # 14263 November 4, 2024

Date	Tkpr	Description	Hours	Rate	Amount
9/30/24	TT	Review and analyze additional prior testimony to assist in preparation for depositions of [redacted] (2.6); correspond with PB regarding analysis of same (0.2).	2.80	480.00	1,344.00
9/30/24	MV	Continue reviewing and updating draft privilege log and and related materials including to address entries designated for further review.	2.50	400.00	1,000.00
9/30/24	JH	Continue reviewing [redacted] emails from productions 5 through 8 in support of deposition and trial preparation.	2.00	325.00	650.00
9/30/24	ASA	Attend and assist JS and HM with notes from meet and confer with opposing counsel (0.6); circulate notes from meeting to Stris team (0.4); review video referenced by opposing counsel (0.1); update running matter memorandum to include document collection efforts, newly filed material, and case updates sent by HM (2.7); organize and file bankruptcy documents and subpoenas (0.5).	4.30	325.00	1,397.50
		TOTAL PROFESSIONAL SERVICES			**$ 1,102,504.50**

Stris & Maher LLP

Invoice # 14263 November 4, 2024

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	20.40	1,250.00	25,500.00
Elizabeth Brannen	EB	Partner	23.80	1,100.00	26,180.00
Bridget Asay	BA	Partner	110.80	1,050.00	116,340.00
Victor O'Connell	VO	Partner	16.30	875.00	14,262.50
John Stokes	JS	Partner	218.60	875.00	191,275.00
Colleen Smith	CS	Associate	104.90	725.00	76,052.50
Peter Brody	PB	Associate	161.80	725.00	117,305.00
Sarah Rahimi	SR	Associate	104.30	650.00	67,795.00
Helen Marsh	HM	Associate	157.40	600.00	94,440.00
Tanya Tice	TT	Discovery Associate	29.40	480.00	14,112.00
Michele Jarrouj	MJ	Discovery Associate	20.10	480.00	9,648.00
Pascale Nyby	PNY	Discovery Associate	124.00	480.00	59,520.00
Venu Alagh	VA	Discovery Associate	156.50	480.00	75,120.00
Holly Sadlon	HS	Discovery Associate	126.10	480.00	60,528.00
Fatima Fofana	FF	Discovery Associate	177.80	480.00	85,344.00
Monica Viramontes	MV	Sr Paralegal	41.00	400.00	16,400.00
Andrew Atsalis	ASA	Fellow	25.40	325.00	8,255.00
Cynthia Huang	CHH	Fellow	87.90	325.00	28,567.50
Jaida Hodge-Adams	JH	Fellow	48.80	325.00	15,860.00
Total			**1,755.30**		**$ 1,102,504.50**

EXPENSES ADVANCED

Date	Task	Description	Amount
8/23/24		StoneTurn - September 2024 services.	12,637.50
9/01/24		Logikcull Discovery Solutions (September 2024).	2,646.00
9/30/24		Peregrine Consultants, LLC - Professional services for September 2024.	21,450.00
		TOTAL EXPENSES ADVANCED	**$ 36,733.50**

Stris & Maher LLP

Invoice # 14263 November 4, 2024

TOTAL THIS INVOICE **$ 1,139,238.00**

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

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

STRIS & MAHER LLP'S SECOND MONTHLY FEE STATEMENT
FOR THE PERIOD OCTOBER 1, 2024, THROUGH OCTOBER 31, 2024

Stris & Maher LLP ("Stris & Maher") submits, pursuant to the Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the "Interim Compensation Order") (ECF No. 264) entered on October 14, 2024, this monthly fee statement for the payment of interim compensation rendered and reimbursement of expenses incurred during the period October 1, 2024 through October 31, 2024 (the "Second Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $1,255,671.00 (80% of the services rendered), plus $120,666.25 (100% of the interim expenses incurred). *See* Interim Compensation Order at ¶ 1(a). Summaries of the fees and expenses are attached as Exhibits 1, 2, and 3. Invoices reflecting detailed time entries are attached hereto as Exhibit 4.

[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), 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.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall serve within 14 days after delivery of the Second Monthly Fee Statement a written notice, via email, upon Stris & Maher and each of the other Fee Notice Parties (as listed below) (the "Written Notice"). The Written Notice shall set forth with reasonable detail the nature of the objection and the amount at issue. If the parties are unable to reach a resolution of the objection within 14 calendar days, the objecting party shall file its objection (the "Objection") with this Court within 3 business days and serve such Objection on Stris & Maher and each of the other Fee Notice Parties. See Interim Compensation Order ¶ 1(c).

The Fee Notice Parties as defined in the Interim Compensation Order are:

a. Rhodium Enterprises, Inc., Attn: Charles Topping (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 2617 Bissonnet Street, Suite 234, Houston, Texas 77005;

b. Debtors' Bankruptcy Counsel, c/o Quinn Emanuel Urquhart & Sullivan, LLP, Attn: Patricia B. Tomasco (pattytomasco@quinnemanuel.com); Razmig Izakelian (razmigizakelian@quinnemanuel.com), Alain Jaquet (alainjaquet@quinnemanuel.com), and Joanna D. Caytas (joannacaytas@quinnemanuel.com), 700 Louisiana, Suite 3900, Houston, Texas 77002;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (mrobinson@provincefirm.com); David Dunn (ddunn@provincefirm.com); Kirsten Lee (klee@province.com); and Andrew Popescu (apopescu@provincefirm.com), 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074;

d. Galaxy Digital, LLC, in its capacity as DIP Agent, c/o Orrick, Herrington & Sutcliffe LLP, Ryan C. Wooten (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 51 West 52nd Street, New York, New York 10019;

e. Counsel or proposed counsel to any statutory committee appointed in these Chapter 11 Cases; and

f. United States Trustee, Ha Minh Nguyen (ha.nguyen@usdoj.gov), 515 Rusk, Suite 3516, Houston, Texas 77002.

If no objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Stris & Maher an amount equal to 80% of the fees and 100% of the expenses listed herein, or if an objection is timely served, such percentage of fees and expenses that are not subject to an objection, as stated in the Interim Compensation Order.

Respectfully submitted this 21th day of November, 2024.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
Patricia B. Tomasco (SBN 01797600)
Joanna D. Caytas (SBN 24127230)
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-and-

STRIS & MAHER LLP

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-and-

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408 W. 11th Street, 5th Floor
Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on November 21, 2024, a true and correct copy of the foregoing Monthly Fee Statement was served through the Court's Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco
Patricia B. Tomasco

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	0.90	$990.00	$792.00
002	Temple Green Data Matter	6.70	$5,682.50	$4,546.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	2,054.40	$1,515,785.00	$1,212,628.00
007	Retention and Fee Applications	21.50	$12,985.00	$10,388.00
008	Non-working Travel for Whinstone Dispute	81.90	$34,146.25	$27,317.00
Total		2165.40	$1,569,588.75	$1,255,671.00

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,100.00	0.90	$990.00

Temple Green Data Matter

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Victor O'Connell	Partner	2012	$875.00	5.50	$4,812.50
Colleen Smith	Associate	2015	$725.00	1.20	$870.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Peter K. Stris	Founding Partner	2001	$1,250.00	19.90	$24,875.00
Elizabeth Brannen	Managing Partner	2001	$1,100.00	179.40	$197,340.00
Bridget Asay	Partner	1997	$1,050.00	219.00	$229,950.00
Victor O'Connell	Partner	2012	$875.00	95.40	$83,475.00
John Stokes	Partner	2016	$875.00	355.20	$310,800.00
Colleen Smith	Associate	2015	$725.00	177.30	$128,542.50
Peter Brody	Associate	2016	$725.00	267.30	$193,792.50
Sarah Rahimi	Associate	2019	$650.00	68.60	$44,590.00
Helen Marsh	Associate	2024	$600.00	240.70	$144,420.00
Tanya Tice	Discovery Associate	1989	$480.00	43.50	$20,880.00
Monica Viramontes	Senior Paralegal	N/A	$400.00	146.50	$58,600.00
Andrew Atsalis	Litigation Fellow	N/A	$325.00	62.20	$20,215.00
Cynthia Huang	Litigation Fellow	N/A	$325.00	57.00	$18,525.00
Shayra Banta	Litigation Fellow	N/A	$325.00	37.70	$12,252.50
Jaida Hodge-Adams	Litigation Fellow	N/A	$325.00	84.70	$27,527.50

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Peter K. Stris	Founding Partner	2001	$1,250.00	0.40	$500.00
Elizabeth Brannen	Managing Partner	2001	$1,100.00	5.70	$6,270.00
Victor O'Connell	Partner	2012	$875.00	2.20	$1,925.00
Cynthia Huang	Litigation Fellow	N/A	$325.00	10.10	$3,282.50
Nicholas Capalbo	Litigation Fellow	N/A	325.00	3.10	$1,007.50

Non-Working Travel for Whinstone Dispute[2]

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,100.00	6.20	$6,820.00
Bridget Asay	Partner	1997	$1,050.00	11.00	$11,550.00
Victor O'Connell	Partner	2012	$875.00	20.30	$17,762.50
John Stokes	Partner	2016	$875.00	7.00	$6,125.00
Peter Brody	Associate	2016	$725.00	23.00	$16,675.00
Sarah Rahimi	Associate	2019	$650.00	14.40	$9,360.00
Total after 50% discount					$34,146.25

[2] Stris & Maher has billed its time for travel in connection with the Whinstone dispute during which no work was performed on a separate invoice at a 50% discount.

EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
JND eDiscovery hosting	$3,765.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
Logikcull Discovery Solutions (October 2024)	$2,646.00
SETEC Investigations	$3,599.00
Fulcrum Legal Graphics	$15,000.00
StoneTurn (September 2024)	$47,600.00
E. Brown expert fees	$48,056.25
Total	$116,901.25

EXHIBIT 4

Stris

November 8, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14283
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through October 31, 2024

RE: Midas Green Litigation

Total Professional Services	$ 990.00
Total Expenses Advanced	$ 3,765.00
TOTAL THIS INVOICE	**$ 4,755.00**
Previous Balance	$ 9,045.00
TOTAL BALANCE DUE	**$ 13,800.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14283 November 8, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
10/07/24	EB	Correspond with PB and G. Cutri regarding [redacted].	.10	1100.00	110.00
10/08/24	EB	Review and respond to further correspondence from former patent litigation counsel G. Cutri.	.10	1100.00	110.00
10/15/24	EB	Review and respond to correspondence from G. Cutri regarding status inquiry concerning [redacted].	.10	1100.00	110.00
10/16/24	EB	Confer with B. Rice regarding inquiry to G. Cutri regarding [redacted].	.10	1100.00	110.00
10/22/24	EB	Confer with G. Cutri (Kirkland) regarding [redacted].	.50	1100.00	550.00
		TOTAL PROFESSIONAL SERVICES			**$ 990.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	.90	1,100.00	990.00
Total			**.90**		**$ 990.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
10/01/24		JND eDiscovery - October invoice.	3,765.00
		TOTAL EXPENSES ADVANCED	**$ 3,765.00**
		TOTAL THIS INVOICE	**$ 4,755.00**

Stris & Maher LLP

Invoice # 14283 November 8, 2024

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14251	11/01/24	855.00	.00	855.00
14257	11/04/24	8,190.00	.00	8,190.00

Previous Balance	$ 9,045.00
Balance Due This Invoice	$ 4,755.00
TOTAL BALANCE DUE	**$ 13,800.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 9,045.00	$ .00	$ .00	$ .00	$ .00	$ 9,045.00

Stris

November 8, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14268
Client # 00346
Matter # 002

INVOICE SUMMARY

For professional services rendered through October 31, 2024

RE: Temple Green Data Litigation

Total Professional Services	$ 5,682.50
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 5,682.50**
Previous Balance	$ 22,490.00
TOTAL BALANCE DUE	**$ 28,172.50**

Electronic Invoice

Stris & Maher LLP

Invoice # 14268 November 8, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
10/04/24	CS	Review lease and identify provisions in support of correspondence with landlord.	.20	725.00	145.00
10/09/24	VO	Confer with CS regarding portion of letter to landlord regarding [redacted] (0.1); confer with [redacted] and [redacted] regarding strategy and action items relating to new request for information [redacted] (0.8); review draft insert prepared by CS (0.1); draft talking points for [redacted] in teleconference with TGD (0.3)	1.30	875.00	1,137.50
10/09/24	CS	Continue reviewing and analyzing relevant lease provisions and drafting portion of [redacted] regarding Temple Site.	1.00	725.00	725.00
10/11/24	VO	Review update from [redacted] regarding teleconference with TGD (0.1); attend videoconference with [redacted] and [redacted] regarding strategy and next steps in addressing same (0.7); prepare draft correspondence to M. Simmons (0.5).	1.30	875.00	1,137.50
10/14/24	VO	Correspond with client and P. Tomasco regarding strategy and response to further correspondence from TGD.	.50	875.00	437.50
10/15/24	VO	Review and revise P. Tomasco letter [redacted] (0.8); emails with [redacted] and [redacted] regarding response to TGD regarding [redacted] (0.7).	1.50	875.00	1,312.50
10/23/24	VO	Confer with [redacted] and [redacted] regarding issues relating to [redacted].	.40	875.00	350.00
10/31/24	VO	Review and revise letter [redacted] (0.4); emails with P. Tomasco regarding same (0.1).	.50	875.00	437.50
		TOTAL PROFESSIONAL SERVICES			**$ 5,682.50**

Stris & Maher LLP

Invoice # 14268 November 8, 2024

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Victor O'Connell	VO	Partner	5.50	875.00	4,812.50
Colleen Smith	CS	Associate	1.20	725.00	870.00
Total			**6.70**		**$ 5,682.50**

TOTAL THIS INVOICE **$ 5,682.50**

Stris & Maher LLP

Invoice # 14268 November 8, 2024

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14247	11/01/24	7,190.00	.00	7,190.00
14259	11/04/24	15,300.00	.00	15,300.00

Previous Balance	$ 22,490.00
Balance Due This Invoice	$ 5,682.50
TOTAL BALANCE DUE	**$ 28,172.50**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 22,490.00	$ .00	$ .00	$ .00	$ .00	$ 22,490.00

Stris

November 14, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14269
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through October 31, 2024

RE: Whinstone Litigation

Total Professional Services	$ 1,515,785.00
Total Expenses Advanced	$ 116,901.25
TOTAL THIS INVOICE	**$ 1,632,686.25**
Previous Balance	$ 1,219,106.00
TOTAL BALANCE DUE	**$ 2,851,792.25**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Stris & Maher LLP

Invoice # 14269 November 14, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
10/01/24	PS	Review and respond to team correspondence regarding site inspections and trial graphics (0.5); review and convey feedback regarding draft of motion to remand reply (0.8); review and evaluate summary judgment issues and strategy (0.9).	2.20	1250.00	2,750.00
10/01/24	EB	Correspond with Fulcrum, PS, VO, and JS regarding trial graphics support (0.4); review and analyze ERCOT expert materials and strategic questions in support of expert report (0.5); attend portion of teleconference with BA, JS, and PB regarding same (1.1); attend teleconference with MV regarding exhibit list (0.2); advise TT regarding memorandum to support Rhodium witness deposition preparation (0.1); correspond with JS and SR regarding [redacted] for same (0.1); attention to case management (0.5); attend teleconference with SR regarding high priority action items including materials for deposition preparation sessions (0.3); correspond with BA and JS regarding deposition scheduling (0.1); prepare for upcoming deposition preparation sessions (0.8).	4.10	1100.00	4,510.00

Stris & Maher LLP

Invoice # 14269 November 14, 2024

Date	Tkpr	Description	Hours	Rate	Amount
10/01/24	BA	Advise PB regarding privilege log (0.4); prepare [redacted] and confer with EB and JS regarding ERCOT expert report [redacted] (1.5); prepare for client update call regarding trial preparation and correspond with JS regarding same (0.3); participate in same (1.2); correspond with litigation team regarding and review production of documents from C. Harris (1.0); review and correspond with A. Swartz regarding revisions to expert report [redacted] (0.4); correspond with JS, PB, and team regarding regarding inspection and data requests (0.3); correspond with litigation team regarding deposition scheduling and witness availability (0.2); review power-related documents from Whinstone provided to C. Griffey and correspond with HM regarding redactions to and correspondence with opposing counsel regarding same (0.4); review and correspond with JS, PB, and HM regarding response to correspondence from Whinstone's counsel regarding potential summary judgment motion and sealing (0.5); review draft opposition to motion to remand and correspond with JS regarding same (0.4).	6.60	1050.00	6,930.00
10/01/24	JS	Attend teleconferences with A. Swartz (0.1) and M. Frederick regarding upcoming depositions and inspection (0.2); confer with BA, EB, and PB regarding expert report status and next steps (1.2); attend portion of client teleconference (1.0); attend teleconference with PB regarding [redacted] emails (0.2); attend teleconferences with CS regarding summary judgment motion status and next steps (0.2); review and evaluate summary judgment issues and strategy (2.1); prepare correspondence with opposing counsel regarding discovery issues and summary judgment conferral (3.5); evaluate deposition [redacted] and next steps for [redacted] depositions (1.6); continue developing trial [redacted] (2.5).	12.60	875.00	11,025.00
10/01/24	SR	Prepare deposition preparation materials for defensive depositions (1.0); review and summarize termination notices for CS in support of summary judgment briefing (2.2); attend teleconference with EB to discuss trial preparation and deposition support tasks (0.3); begin conducting legal research in support summary judgment briefing for CS (2.0).	5.60	650.00	3,640.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/01/24	CS	Continue reviewing and analyzing documents relevant to [redacted] in anticipation of preparing him for his deposition (1.9); review and analyze documents regarding Whinstone's calculation of profit share (1.0); attend teleconference with JS to discuss motion for partial summary judgment (0.2); continue drafting trial brief outline (2.2); continue drafting motion for partial summary judgment (2.9).	8.20	725.00	5,945.00
10/01/24	JH	Tag documents for upcoming production at PB request.	2.00	325.00	650.00
10/01/24	PB	Analyze materials for use in [redacted] expert report (0.8); prepare privilege log and qc redacted documents for production (4.6); attend teleconference with JS regarding email review (0.2); attend teleconference with MV and HM regarding privilege log (0.3); assist JS with expert materials (0.1); qc and prepare final document production (2.7); analyze supporting materials for [redacted] expert report (0.8).	9.80	725.00	7,105.00
10/01/24	ASA	Download and organize documents from past productions in native and PDF form for use by Rhodium's expert witnesses at request of PB (2.7); create and update expert tracking materials for HM and team (1.3).	4.00	325.00	1,300.00
10/01/24	HM	Review and respond to team correspondence regarding document discovery and privilege log (2.5); attend teleconference with PB, and MV regarding privilege log (0.3); qc organization and completeness of internal case files (1.4); advise ASA regarding updates to same and case management materials (0.8); revise notes from September 30, 2024 meeting with [redacted] and [redacted] (0.6); review and analyze documents [redacted] for [redacted] deposition preparation (1.5); review and revise expert materials lists (0.5).	7.60	600.00	4,560.00
10/01/24	TT	Draft memorandum to EB and PB in support of offensive and defensive depositions and deposition preparation.	4.80	480.00	2,304.00
10/01/24	MV	Review documents and [redacted] to prepare for (2.0) and attend (0.3) teleconference with PB and HM regarding privilege log and [redacted]; begin implementing revisions to same (1.0); attend teleconference with EB regarding exhibit list (0.2).	3.50	400.00	1,400.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/02/24	VO	Confer with JS, BA, and PB regarding deposition preparation.	1.00	875.00	875.00
10/02/24	PS	Review emails regarding discovery and deposition scheduling and confer regarding same.	.30	1250.00	375.00
10/02/24	EB	Prepare for teleconference with [redacted] expert (1.5); attend teleconference with BA regarding same and trial preparation and strategy (0.8); attend portion of teleconference with PB, SR, HM, MV, JHA, and AAS regarding exhibit list and deposition support (1.0); attend portion of teleconference with BA, JS, HM, and [redacted] expert regarding [redacted] and information in support of report (0.4); draft portions of [redacted] (1.0); review and propose revisions to Rule 30(b)(6) deposition notice (0.2); analyze initial questions from TT in support of deposition preparation (0.1); attend teleconference with TT regarding follow-up questions regarding same and revisions to [redacted] (0.2); correspond with TT regarding same and related analysis (0.1); attend teleconference with PB regarding action items including production of additional expert documents and deposition preparation (0.5); attend teleconference with HM regarding trial preparation (0.1).	5.90	1100.00	6,490.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/02/24	BA	Attend teleconference with EB to prepare for meeting with [redacted] expert [redacted] (0.8); correspond with PB regarding document production issues (0.1); correspond with HM regarding provision of third party productions to opposing counsel (0.1); draft proposed email for opposing counsel regarding late disclosure of A. Harris and documents from same, and convey draft to JS (0.2); correspond with HM, AS, JS and team regarding deficiencies in Whinstone's production related to power and power credit data, draft proposed email to opposing regarding same, and convey same to JS (0.5); confer with [redacted], EB, JS, and HM regarding [redacted] for report, data needs, and [redacted] (0.5); continue outlining [redacted] for expert report (0.5); attend teleconference with JS regarding high priority action items and task assignments (0.4); confer with PB, VO, and JS regarding deposition preparation (1.1); confer with JS, [redacted] and [redacted] regarding trial preparation (0.5); continue reviewing draft opposition to motion to remand and convey comments to P. Tomasco (0.4); correspond with HM and PB regarding protective orders to be signed by [redacted] (0.1); review draft 30(b)(6) notice and correspond with JS regarding same, and review comments from EB on same (0.4); correspond with team regarding Whinstone's productions and Rhodium's productions, and monitor correspondence regarding Whinstone's inspection and data requests (0.3).	5.80	1050.00	6,090.00
10/02/24	JS	Attend teleconference with BA, VO, and PB regarding deposition strategy (1.1); call with J. Cohn regarding trial and summary judgment strategy (0.7); call with [redacted] regarding Whinstone inspection (0.4) and with M. Frederick regarding same (0.2); call with A. Swartz regarding production question (0.1); call with [redacted] regarding [redacted] report status and next steps (0.1); call with BA regarding high priority action items on discovery, motion practice, and trial planning (0.4); call with CS regarding MSJ arguments and next steps on same (0.3); work on deposition defense [redacted] for [redacted] (2.5); review and evaluate MSJ arguments and briefing on same (2.2); prepare correspondence with Foley regarding data-production and related high priority discovery issues (3.1); confer with PB regarding [redacted] issues and evaluate same (1.4).	12.50	875.00	10,937.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/02/24	SR	Attend teleconference with EB, PB, HM, VM, JHA, and AAS regarding exhibit list and deposition documentary support (1.3); conduct legal research regarding contract termination to support summary judgment briefing (3.9); prepare for [redacted] deposition preparation sessions (2.4).	7.50	650.00	4,875.00
10/02/24	CS	Continue reviewing documents relevant to [redacted] and continue drafting [redacted] in anticipation of preparing him for his deposition (2.1); meet with JS to discuss [redacted] deposition (0.3); correspond with SR regarding materials for [redacted] deposition (0.2); continue drafting motion for partial summary judgment (4.3); review and analyze case law regarding [redacted] (1.1).	8.00	725.00	5,800.00
10/02/24	JH	Assist MV with information in support of privilege log (1.1); attend teleconference with EB, PB, SR, HM, MV, and AAS regarding exhibit list and deposition documentary support (1.3); prepare notes for same (0.3); continue reviewing [redacted] communications in preparation for upcoming depositions, at JS request (1.0).	3.70	325.00	1,202.50
10/02/24	PB	Analyze [redacted] materials to be used in preparation of expert report and preparation for deposition defense of [redacted] (2.5); confer with JS regarding [redacted] issues and analysis of same (1.4); prepare final production of documents to Whinstone (3.2); attend teleconference with JHA, EB, MV, HM, and AAS regarding exhibit list preparation and trial preparation strategy (1.3); attend teleconference with EB regarding deposition defense and expert reports (0.5); attend teleconference with HM and A. Swartz regarding expert discovery (0.5); confer with BA, JS, and VO regarding deposition preparation and case strategy (1.0); attend teleconference with [redacted], and [redacted] regarding [redacted] and follow-up discovery items (1.0).	11.40	725.00	8,265.00
10/02/24	ASA	Attend teleconference with EB, PB, SR, HM, VM, and JHA regarding exhibit list and deposition documentary support (1.3); prepare template of Rhodium trial and deposition exhibit tracking spreadsheet for use by MV (0.9).	2.20	325.00	715.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/02/24	HM	Attend part of teleconference with EB, PB, SR, MV, JHA, and AA regarding exhibit list and deposition documentary support (1.2); analyze and review and respond to team correspondence regarding conferral with Whinstone's counsel, documents shared with experts, and redacted documents produced by Whinstone (3.0); confer with EB regarding trial preparation (0.1); attend portion of teleconference with BA, EB, JS, and C. Griffey to discuss outstanding materials needed (0.1); review and analyze opposing and third party document productions to identify materials for ERCOT expert C. Griffey and provide same (3.8); attend teleconference with PB and A. Swartz to discuss outstanding discovery items and review tasks (0.5); review and revise task list (0.3); review and revise Rule 30(b)(6) deposition notice (1.0); draft email to Whinstone's counsel regarding C. Harris document production (0.8); attention to documents requested by P. Tomasco (0.4).	11.20	600.00	6,720.00
10/02/24	TT	Attend teleconference with EB regarding action items in support of depositions of Rhodium and Whinstone and [redacted] expert report (0.2); revise background [redacted] (2.6).	2.80	480.00	1,344.00
10/02/24	MV	Review [redacted] for privilege log and incorporate additional [redacted], per attorney instruction (0.5); attend teleconference with EB, PB, SR, HM, JHA, and AAS regarding exhibit list and deposition documentary support (1.3); continue revising and editing privilege log (2.2).	4.00	400.00	1,600.00
10/03/24	VO	Confer with [redacted] to get update on [redacted] (0.2); correspondence with JS, W. Thompson, and J. Cohn regarding same (0.1); confer with JS regarding strategy in light of [redacted] update regarding [redacted] (0.9); confer with JS, BA, J. Cohn, and W. Thompson regarding strategy in light of same (0.3); confer with JS and [redacted] regarding same (0.5); confer with P. Tomasco, [redacted] and JS regarding same (0.6).	2.60	875.00	2,275.00
10/03/24	PS	Review and attend to emails regarding discovery.	.40	1250.00	500.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/03/24	EB	Continue drafting portions of [redacted] (3.6); correspond with BA, JS, PB, HM, A. Swartz, and [redacted] regarding review and production of additional documents in support of same (0.2); review and comment on draft [redacted] expert report (0.9); attend teleconference with PB regarding revisions and additional information in support of same (0.5); correspond with TT regarding review of [redacted] testimony and evidence in support of same (0.1); correspond with PS, VO, and JS regarding (0.1) and correspond (0.1) and attend teleconference (0.5) with Fulcrum regarding trial graphics; correspond with BA, JS, PB, W. Thompson and A. Swartz regarding coordination of documents for use in depositions and deposition preparation (0.2); correspond with BA and HM regarding trial preparation (0.2); attend teleconference with TT regarding action items in support of portions of same and [redacted] (0.2); correspond with C. Hickey regarding proposed revisions to engagement letter for graphics support (0.2); review and respond to correspondence from BA and HM regarding additional production of documents from Whinstone and Priority Power, deficiency correspondence, and provision to ERCOT expert (0.2).	6.90	1100.00	7,590.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/03/24	BA	Attend teleconference with PB, HM, and clients regarding outstanding discovery production questions (0.3); confer with CS and JS regarding summary judgment motion and trial brief (1.2); review and revise draft motion for summary judgment (01.3); confer with JS, [redacted] and P. Tomasco regarding expert testimony and opinions from [redacted] and related deposition preparation (1.1); confer with JS, VO, J. Cohn and W. Thompson regarding potential witness (0.3) and prepare and convey analysis of issues regarding same (0.2); correspond with HM, EB, and PB regarding documents for review by C. Griffey and production of same (0.4); correspond with PB and JS regarding advising Whinstone of potentially privileged document (0.1); review nonprivilege redactions on Whinstone documents reviewed by [redacted] and correspond regarding same (0.1); correspond with HM, J. Cohn and team regarding follow up on Ledoux subpoena (0.2); review Priority Power production, correspond with HM and EB regarding conveying same to C. Griffey and follow up with Priority Power, and review and edit draft letter seeking additional data (0.5); review Whinstone's motion for summary judgment, correspond with PB regarding same, and correspond with bankruptcy counsel regarding procedural requirements for summary judgment practice (0.9); review Whinstone's discovery responses and began analyzing deficiencies in same (0.9); review analysis from HM of missing documents in Whinstone's production and correspond with HM regarding next steps (0.2).	7.70	1050.00	8,085.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/03/24	JS	Confer with BA and CS regarding MSJ and trial brief (1.2); review and evaluate draft motion for summary judgment (1.0); confer with BA, [redacted], and P. Tomasco regarding expert testimony from [redacted] (1.1); confer with BA, VO, J. Cohn, and W. Thompson regarding [redacted] witness (0.3); calls with [redacted] and VO (0.5), [redacted], VO, and P. Tomasco (0.6), P. Tomasco (0.2), and VO (0.8) regarding same; evaluate adjustments to trial presentation with VO in light of same (0.9); review and evaluate correspondence from Foley regarding discovery matters (0.5); review and evaluate Foley responses to RFAs and interrogatories (1.0); review and evaluate Whinstone motion for summary judgment (1.5); correspond with PB regarding same (0.4); attend teleconference with PB regarding [redacted] issues (0.5).	10.50	875.00	9,187.50
10/03/24	SR	Continue drafting [redacted] deposition preparation [redacted]	6.90	650.00	4,485.00
10/03/24	CS	Confer with JS and BA to discuss summary judgment motion and trial brief (1.2); continue drafting partial summary judgment motion (3.6); continue drafting outline for trial brief (2.5).	7.30	725.00	5,292.50
10/03/24	JH	Continue reviewing and flagging [redacted] communications for use in preparation for upcoming depositions (3.5); assist HM and ASA to prepare new files for expert C. Griffey (1.0).	4.50	325.00	1,462.50
10/03/24	PB	Draft preparation [redacted] for upcoming deposition defense of [redacted] (1.1); prepare, finalize, and serve Debtors' thirteenth production of documents (3.7); attend teleconference with JS regarding [redacted] issues (0.5); attend teleconference with [redacted], BA, and HM regarding potential [redacted] issues (0.3); attend teleconference with EB regarding [redacted] expert report (0.5); analyze financial documentation to support damages expert report (4.3).	10.20	725.00	7,395.00
10/03/24	ASA	Assist with provision of documents to Rhodium expert C. Griffey (0.4); update case management material to to ensure attorney organization (1.5).	1.90	325.00	617.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/03/24	HM	Attend teleconference with BA and PB, and MS, CT, PR, and [redacted] to discuss outstanding discovery production questions related to [redacted] (0.3); review and analyze TXU invoices, Priority Power Management Documents, and Rhodium Energy Usage report for temporal gaps and redactions (3.0); create and circulate a chart for temporal gaps and redactions of documents produced by Whinstone (1.5); draft letter to counsel for Priority Power Management (0.2); review, analyze, and organize supplemental materials from Whinstone productions and send to Charles Griffey (2.3); review and respond to team correspondence relating to Whinstone's productions and subpoena responses from Priority Power Management and James Ledoux (2.7).	10.00	600.00	6,000.00
10/03/24	TT	Confer with EB regarding questions to assist with preparation [redacted] report (0.2); review, analyze, and draft memorandum to EB regarding analysis of pleadings, hearing transcripts, contracts, and documents to assist in preparation of same (2.7); draft [redacted] to assist in deposition preparation for experts and Rhodium and opposing witnesses (3.0).	5.90	480.00	2,832.00
10/03/24	TT	Review and analyze December 2023 and March 2024 Temporary Injunction Hearings regarding [redacted] issues to assist in preparation for depositions and trial (2.0).	2.00	480.00	960.00
10/03/24	MV	Review and format data on draft privilege log (3.0); review, update, and cross-check documents for inclusion on same (4.0).	7.00	400.00	2,800.00
10/04/24	PS	Review emails and confer with team on various items of litigation strategy including Foley's emergency motion.	1.30	1250.00	1,625.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/04/24	EB	Correspond with A. Schwartz, BA, VO, JS, PB, SR, and HM regarding [redacted] and deposition preparation materials (0.1); review and analyze additional materials in support of and continue drafting portions of [redacted] (2.1); review, respond, and incorporate additional feedback and questions from TT into draft of same (0.1); review and respond to initial update from TT regarding [redacted] evidence with follow-up questions (0.1); correspond with BA, JS, PB, and HM regarding same and potential additions and revisions to [redacted] expert report (0.5); review and respond to team correspondence regarding additional discovery-related issues and action items (0.2).	3.10	1100.00	3,410.00
10/04/24	BA	Confer with JS, J. Cohn, and W. Thompson regarding strategy and outline summary judgment motion and opposition (1.4); outline research tasks for same, convey to JS for review, and convey to W. Thompson and J. Cohn for staffing of same (0.4); review summary judgment notes and outline for J. Cohn, update with notes of teleconference, and convey same to CS and JS for review (0.3); correspond with bankruptcy counsel regarding timing and procedural requirements for summary judgment filings (0.1); continue reviewing and analyzing Whinstone's discovery responses and convey analysis of deficiencies in same to JS, HM, PB, and A. Swartz, with proposal for deficiency letter (1); correspond and confer with SD to make binders for use in summary judgment and trial brief preparation (0.1); correspond with EB regarding potential opinion from [redacted] rebutting power overage claims and review response from [redacted] regarding same (0.3); review proposed email from JS to M. Thomas regarding expert information and respond to same (0.1); draft, review, and revise deficiency letters to Whinstone and Riot regarding document productions, missing documents, and deficient responses to written discovery, correspond with JS, HM, and PB regarding same, and confer with JS regarding same (3.2); review correspondence and filings related to Whinstone's emergency motion to alter scheduling order (0.2).	7.00	1050.00	7,350.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/04/24	JS	Call with BA, J. Cohn, and W. Thompson regarding MSJ strategy (1.4); call with W. Thompson regarding deficiency letter on Whinstone RFA Responses (0.2); call with J. Cohn regarding MSJ schedule and Whinstone emergency motion (0.1); prepare deficiency letters regarding Whinstone discovery responses (5.5); prepare correspondence to Foley regarding emergency motion and MSJ schedule (0.3); conduct legal research regarding issues in Foley MSJ on breach questions (0.5); review high-relevance documents in connection with opposition to Foley MSJ (0.9); correspond with SMLLP, LKC, and client teams regarding emergency motion and MSJ schedule (0.2); prepare correspondence to Foley regarding deposition scheduling (0.5).	9.60	875.00	8,400.00
10/04/24	CS	Review and analyze edits to motion for partial summary judgment from [redacted] (0.5); continue drafting and revising motion for partial summary judgment (7.7).	8.20	725.00	5,945.00
10/04/24	JH	Continue reviewing Rhodium [redacted] to be issue-tagged and flagged as [redacted] with ASA in preparation for upcoming depositions.	4.00	325.00	1,300.00
10/04/24	PB	Assist in preparation and drafting of expert report of [redacted] (2.3); prepare for defense of deposition of [redacted] (3.0); analyze financial materials for use in expert report of [redacted] (0.6); teleconference with [redacted] regarding financial data (0.6).	6.50	725.00	4,712.50
10/04/24	ASA	Update case status [redacted] to reflect recent developments (0.6); assist attorneys with deposition scheduling and preparation including responding to rolling requests from JS and VO for documents (2.9).	3.50	325.00	1,137.50
10/04/24	HM	Continue reviewing and analyzing TXU invoices, Priority Power Management Documents, and Rhodium Energy Usage report and other key documents produced by Whinstone for temporal gaps and redactions (4.0); draft Rhodium's Third Deficiency Letter regarding deficiencies in Whinstone's productions (3.8); review and respond to team correspondence regarding Rhodium's Third Deficiency Letter and Whinstone's responses to Rhodium's second set of requests for production, first set of requests for admission, and first set of interrogatories (1.5).	9.30	600.00	5,580.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/04/24	TT	Review and analyze December 2023 and March 2024 Temporary Injunction Hearings regarding [redacted] issues to assist in preparation for depositions and trial (9.0).	9.00	480.00	4,320.00
10/04/24	MV	Continue revising privilege log (3.0); [redacted] on log for further attorney review (1.0); review draft exhibit list and revise template for same (0.5).	4.50	400.00	1,800.00
10/05/24	BA	Review and revise discovery correspondence to Whinstone's counsel, review discovery letter from Whinstone's counsel, correspond with JS, PB, and HM regarding same, and finalize and send fourth deficiency letter to Whinstone's counsel (1.2); confer with JS regarding creditor correspondence (0.1).	1.30	1050.00	1,365.00
10/05/24	JS	Work on trial strategy outlining (1.5); review Whinstone deficiency letter and confer with BA, HM, PB regarding same (0.5); review and revise deficiency letters regarding Whinstone discovery responses in preparation for finalization of same (0.5).	2.50	875.00	2,187.50
10/05/24	PB	Analyze correspondence from Whinstone regarding purported discovery deficiencies and draft response to same.	2.30	725.00	1,667.50
10/05/24	HM	Revise, finalize, and send Rhodium's Third Deficiency Letter to Whinstone and Riot (1.5); collect, send, and log documents for ERCOT expert Charles Griffey's review (0.5); review and revise letter from JS to Whinstone's counsel regarding Whinstone's responses to Rhodium's requests for admission, interrogatories, and requests for documents (0.5); begin reviewing past transcripts of temporary injunction hearings for [redacted] to proffer at trial (1.5).	4.00	600.00	2,400.00
10/06/24	BA	Review and revise draft 30(b)(6) notice and convey same to EB, JS, PB, and HM for review (1.8); research new witness disclosed by Whinstone, correspond with JS and team regarding implications of same, and correspond with EB regarding issues related to [redacted] report (0.4); research and draft portions of response to Whinstone's Oct 5 discovery letter and correspond with PB regarding same (1.5).	3.70	1050.00	3,885.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/06/24	JS	[redacted] with [redacted] regarding deposition scheduling (0.6); review and revise 30(b)(6) notice (0.7); review and evaluate Whinstone deficiency letter and our response to same (1.0); evaluate alleged payment defaults by Whinstone aside from profit-share underpayment (0.8); outline high-priority action items for the week and prepare [redacted] regarding same (1.0); correspond with Foley regarding MSJ scheduling (0.2); call with J. Cohn regarding MSJ response on miner-ownership issue (0.2).	4.50	875.00	3,937.50
10/06/24	PB	Draft response to document production deficiency letter and correspondence regarding same (6.1); teleconferences with expert [redacted] regarding data analysis (0.5).	6.60	725.00	4,785.00
10/06/24	HM	Continue reviewing and analyzing prior testimony of Whinstone and Riot witnesses from temporary injunction hearings (1.2).	1.20	600.00	720.00
10/07/24	VO	Attend team conference to discuss deposition prep (0.9); attend team conference regarding trial preparation and related action items including witness list (2.4).	3.30	875.00	2,887.50
10/07/24	PS	Attend teleconference with EB, BA, VO, JS, CS, and PB regarding trial preparation and related action items including witness list.	2.40	1250.00	3,000.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/07/24	EB	Attend teleconference with BA regarding action items including further revisions to Rule 30(b)(6) deposition notice (0.1); further revise and correspond with co-counsel regarding same (0.1); review and respond to further correspondence from [redacted] regarding information for [redacted] (0.2); continue drafting portions of same (2.0); attend teleconference with BA, PB, HM, and [redacted] regarding same (1.2); attention to resulting action items including instructing HM regarding additional documents for [redacted] (0.2); prepare for (0.1) and attend portion of (0.8) teleconference with VO, JS, PB, SR, HM, and W. Thompson and A. Swartz regarding deposition preparation and coordination; advise ASA regarding revisions to witness preparation materials and draft deposition notice for first deponent (0.1); review and respond to team correspondence regarding additional discovery and expert-related issues (0.3); attend teleconference with PS, BA, VO, JS, CS, and PB regarding trial preparation and related action items including witness list (2.4); review and respond to update from TT regarding [redacted] testimony and evidence in support of [redacted] report (0.1).	7.60	1100.00	8,360.00
10/07/24	BA	Review draft response to Whinstone's discovery letter drafted by PB, correspond with JS regarding same, and propose edits to same (0.7); confer with EB regarding edits to 30(b)(6) notice (0.1); continue outlining and drafting trial brief (2); confer with JS, EB, VO, PS, CS, and PB to discuss trial preparation and priority action items including witness list (2.4); review draft witness list, correspond with HM and team regarding revisions to same, convey same to bankruptcy counsel, review edits from bankruptcy counsel, review Whinstone's witness list, and review and approve final witness list for service (0.8); confer with [redacted], EB, HM, and PB regarding preparation of expert report (1.2); review deposition notices from Whinstone's counsel, correspond with JS regarding same, review response from Whinstone's counsel regarding same, review correspondence from A. Swartz regarding proposed deposition assignments, and correspond with JS, EB, HM, and PB regarding same (0.3).	7.50	1050.00	7,875.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/07/24	JS	Prepare materials and [redacted], W. Thompson, and VO regarding deposition preparation and planning (0.9); confer with J. Cohn regarding Whinstone request to alter MSJ schedule (0.1); attend teleconference with counsel for potential witness (0.2); advise PB regarding expert issue (0.1); attend teleconference with BA, EB, CS, PB, VO, PS regarding trial strategy and [redacted] (2.4); further prepare for defensive deposition of [redacted] (2.9); evaluate and draft topics for offensive depositions (0.5); review and revise correspondence regarding discovery deficiencies (0.6); create deposition scheduling plan and correspond with Foley regarding same (0.7); attend portion of call with EB, PB, A. Swartz, and W. Thompson regarding deposition coordination (0.4); evaluate [redacted] issues (0.4); continue outlining trial presentation strategy (1.6).	10.80	875.00	9,450.00
10/07/24	SR	Attend videoconference with EB, JS, HM, PB, and LKC team to discuss deposition preparations and planning (0.9); continue drafting [redacted] deposition preparation [redacted] (6.9).	7.80	650.00	5,070.00
10/07/24	SB	Review RIOT presentations and assist with citations and cite checking of [redacted] expert report.	6.30	325.00	2,047.50
10/07/24	CS	Meet with JS, BA, EB, PS, and PB regarding trial strategy and themes (2.4); continue drafting and revising motion for partial summary judgment (6.1); review draft of trial brief (0.5).	9.00	725.00	6,525.00
10/07/24	CHH	Update case management materials (1.0); correspond with HM regarding same (0.2); review and analyze C. Harris (Whinstone) documents and designate same for further review (2.2); correspond with A. Swartz regarding same (0.2); summarize [redacted] testimony for trial use and confer with HM regarding same (0.8).	4.40	325.00	1,430.00
10/07/24	JH	File ongoing discovery exchanges (0.5); prepare additional documents for expert C. Griffey at HM request (0.5); continue reviewing produced communications to assist with preparation for upcoming depositions (3.0).	4.00	325.00	1,300.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/07/24	PB	Attend teleconference with Stris and LKC teams regarding witness preparation (0.9); revise correspondence to Whinstone regarding discovery deficiencies (1.6); attend trial preparation strategy call with PS, VO, JS, EB, BA, and CS (2.4); attend part of teleconference with expert [redacted] regarding [redacted] issues (1.1); assist in preparation of expert report [redacted] (2.8).	8.80	725.00	6,380.00
10/07/24	ASA	Create revised [redacted] to assist with deposition preparation at request of EB (3.0); collect Riot SEC filings at request of HM and create ShareFile link for distribution (1.0).	4.00	325.00	1,300.00
10/07/24	HM	Draft, revise, and circulate Debtors' proposed fact witness list (0.8); attend portion of teleconference with PB, SR, EB, JS, VO, and LKC to discuss deposition preparation (0.8); draft and circulate deposition preparation [redacted] for organization and collaboration (1.5); attend teleconference with [redacted], PB, EB, BA to discuss expert report, documents, and opinions (1.2); confer with CH about organizing production log (0.2); confer with CH about summarizing temporary injunction hearing testimony by Whinstone witnesses (0.1); confer with AA, MV, and JHA regarding sending additional documents to C. Griffey for expert report preparation (0.5); create and organize materials for deposition preparation and collaboration (1.2); draft materials regarding trial proof and send to EB for review (3.8).	9.90	600.00	5,940.00
10/07/24	TT	Review and analyze Temporary Injunction Hearing on March 2024 and analyze [redacted] regarding alleged OSHA violations, equipment maintenance issues and spill incidents at Rockdale site to assist in preparation for depositions and trial (8.0); draft memorandum to EB regarding same analysis (1.0).	9.00	480.00	4,320.00
10/07/24	MV	Review correspondence from EB and create document searches in support of expert depositions (1.5); revise exhibit list and prepare contract exhibits (4.0); review local court rules and standing order regarding exhibit list and protocol for trial, and correspondend with team regarding same (1.0).	6.50	400.00	2,600.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/08/24	PS	Review revisions to motion for partial summary judgment and confer with team regarding same.	1.80	1250.00	2,250.00
10/08/24	EB	Review draft and correspond with JS and PB regarding questions concerning patent portion of [redacted] (0.2); continue drafting portions of [redacted] (6.4); attend teleconference with PB, [redacted] regarding information in support of [redacted] report (1.1); attend teleconference with PB regarding resulting action items (0.2); attend portion of teleconference with BA, JS, PB, HM, J. Cohn, W. Thompson, and A. Swartz regarding coordination between and among expert reports and positions (1.2); review, analyze, and confer with TT regarding analysis of evidence in support of [redacted] (0.3); review draft C. Harris deposition notice and advise ASA regarding revisions to same (0.1); review, propose [redacted], and correspond with BA, JS, and M. Frederick and LKC team regarding finalization of Rule 30(b)(6) notice (0.1).	9.60	1100.00	10,560.00
10/08/24	BA	Attend hearing on briefing schedule (0.2); participate in call with JS, EB, PB, W. Thompson, A. Swartz, and J. Cohn to discuss expert opinions (1.5); research and draft trial brief (0.8); attend teleconference with client, co-counsel and bankruptcy counsel (0.9); correspond with JS and with bankruptcy counsel regarding drafting of expert disclosure for [redacted] (0.2); review correspondence from J. Cohn regarding expert disclosure of [redacted] (0.2); review and revise draft summary judgment motion and correspond with JS regarding same (2.2).	6.00	1050.00	6,300.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/08/24	JS	Prepare for and attend hearing on emergency motion regarding MSJ schedule (1.2); call with J. Cohn (0.2) and W. Thompson and J. Cohn (0.1) regarding [redacted] testimony; call with A. Swartz, W. Thompson, J. Cohn, PB, BA, EB, and HM regarding deposition planning and expert coordination (1.5); call with client, LKC, Stris, and Quinn teams regarding high priority action items (0.9); work on [redacted] report (1.5); review and revise summary judgment motion (3.4); evaluate status and coordinate next steps on miner-level data transfer in connection with Foley letters (0.3); call with Province and Quinn teams regarding scheduling of [redacted] (0.3); evaluate research regarding Whinstone breaches (0.4) and potential insolvency issues (0.4); continue deposition defense [redacted] for [redacted] depositions (1.0).	10.80	875.00	9,450.00
10/08/24	SR	Continue drafting [redacted] deposition preparation [redacted]	9.70	650.00	6,305.00
10/08/24	SB	Review RIOT presentations and fill in cites for [redacted] in [redacted] for EB.	.50	325.00	162.50
10/08/24	CS	Review and respond to correspondence from SR regarding preparation materials for [redacted] deposition (0.6); draft declaration of [redacted] in support of summary judgment including identification and incorporation of accompanying documents (3.5); draft proposed order granting motion for partial summary judgment (0.4); review and analyze supporting contract-related case law (1.1); continue revising motion including to incorporate edits and respond to comments from PS (1.8).	7.40	725.00	5,365.00
10/08/24	CHH	Assist MV and A. Swartz with review of materials for exhibit list and exhibit collection.	.80	325.00	260.00
10/08/24	JH	Finish reviewing documents for JS to assist with depositions and trial preparation.	3.50	325.00	1,137.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/08/24	PB	Prepare for (0.3) and attend (1.1) teleconference with EB, [redacted] regarding supporting materials for expert reports; attend follow-up call with EB regarding same (0.2); analyze data regarding inter-entity transfers (1.2); attend portion of teleconference with W. Thompson, A. Swartz, J. Cohn, EB, BA, and JS regarding depositions and expert work (1.1); teleconference with [redacted] regarding upcoming [redacted] expert report (0.9); analyze supporting data regarding expert report of [redacted] (3.2); confer with HM regarding discovery issues and respond to correspondence regarding same (0.3).	7.10	725.00	5,147.50
10/08/24	ASA	Prepare deposition notices for C. Harris, D. Schatz, H. Davidson, J. McGonegal, and K. Haugen, and confirm deposition scheduling specifics (2.8); collect additional documents from Whinstone production for provision to C. Griffey (0.5); continue to assist attorneys with defensive deposition preparation materials (0.7).	4.00	325.00	1,300.00
10/08/24	HM	Revise, finalize, and serve C. Harris deposition notice (1.2); attend teleconference with BA, JS, EB, PB, and LKC to discuss expert reports and deposition preparation (1.5); confer with PB about documents to send to [redacted] (0.2); collect and prepare additional invoices for [redacted] (3.2); review and respond to team correspondence regarding outstanding document discovery issues and upcoming depositions (3.0); attend emergency motion on scheduling before Judge Alfredo Perez (0.2); review and summarize insolvency research for JS (0.3); correspond with counsel for Priority Power Management about subpoena response (0.2); update master deposition schedule (0.5).	10.30	600.00	6,180.00
10/08/24	TT	Review and analyze December 2023 and March 2024 Temporary Injunction Hearings regarding site safety issues in preparation for depositions and trial (8.5); Draft memorandum to EB regarding review and analysis (1.5)	10.00	480.00	4,800.00
10/08/24	MV	Continue preparing exhibit list and exhibits for trial.	7.00	400.00	2,800.00
10/09/24	PS	Prepare for and confer with JS regarding insolvency issues (0.7); research regarding same (1.4); confer with P. Tomasco regarding same (0.2).	2.30	1250.00	2,875.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/09/24	EB	Continue drafting portions of [redacted] (4.6); correspond with [redacted] regarding same including analysis of additional documents in support of same (0.4); correspond with ASA and Fulcrum regarding engagement for graphics and trial support and potential graphic for [redacted] (0.3); correspond with (0.2) and attend teleconferences with (0.3) HM regarding additional documents for [redacted] review and respond to team correspondence regarding various issues including procedure for Temple sales bids and deposition preparation (0.2); begin reviewing [redacted] (0.5); attend teleconference with PB regarding reconciling and revising statements in [redacted] versus [redacted] (0.2); confer with ASA regarding tables for [redacted] (0.2).	6.90	1100.00	7,590.00
10/09/24	BA	Confer with HM, PB, and JS regarding discovery conferral issues (0.2); review and analyze proposed revisions to summary judgment motion, and correspond and confer with JS regarding same (0.4); participate in teleconference with client and bankruptcy counsel regarding Riot's request to participate in Temple bid process (0.6); confer with PB, A. Swartz, and W. Thompson regarding expert reports (1.5); draft and revise partial summary judgment motion (2.2); correspond and confer with JS regarding [redacted] deposition, disclosure, and related issues (0.3).	5.20	1050.00	5,460.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/09/24	JS	Call with J. Cohn regarding [redacted] (0.2); call with P. Tomasco regarding same (0.1); calls with PB regarding miner data production (0.3); call with [redacted] regarding [redacted] production (0.1); call with BA regarding MSJ edits (0.1); call with CS regarding same (0.1); call with [redacted] regarding deposition prep (0.2); call with W. Thompson regarding solvency questions (0.4); call with [redacted] regarding [redacted] (0.1); call with [redacted] regarding [redacted] and litigation overlay (0.4); prepare for and attend [redacted] call regarding [redacted] report (1.3); call with P. Tomasco regarding [redacted] testimony (0.2); calls with J. Cohn and W. Thompson regarding plan for insolvency testimony (0.7); prepare for and attend [redacted] (0.9); prepare for and attend conferral call with Foley regarding outstanding discovery issues (2.1); plan for depositions of RHDM and Whinstone witnesses (1.3); review and revise [redacted] (3.1); review and revise [redacted] (1.5) and confer with PB regarding same (0.3); review and evaluate [redacted] and propose edits to same (1.0); final review of 30(b)(6) notice (0.2); correspond with Foley regarding depositions and other discovery issues (1.0).	15.60	875.00	13,650.00
10/09/24	SR	Review and revise [redacted] deposition preparation material (2.0); assist JS and team in preparing for other depositions (2.7).	4.70	650.00	3,055.00
10/09/24	CS	Begin drafting opposition to Whinstone's motion for partial summary judgment.	7.30	725.00	5,292.50
10/09/24	CHH	Summarize categories of necessary trial exhibits for collection and emails with MV regarding same (0.8); review and analyze documents provided to [redacted] and collect Bates numbers for same in preparation for trial (2.0); review and analyze all produced invoices in discovery database, and summarize and collect same for [redacted] (expert) further review (2.0); create various ShareFile links to transfer further documents to experts in preparation for reports (0.2).	5.00	325.00	1,625.00
10/09/24	JH	Prepare documents for VO to assist with deposition and trial preparation.	.80	325.00	260.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/09/24	PB	Analyze draft report of [redacted] (1.2); correspondence regarding same (0.6); analyze supporting materials to assist in preparation by [redacted] of draft [redacted] (3.2); revise [redacted] regarding background matters (1.7); attend strategy call with W. Thompson, A. Swartz, and BA regarding site safety expert (1.5); call with JS regarding potential report of [redacted] (0.3).	8.50	725.00	6,162.50
10/09/24	ASA	Create table of power curtailment credits at request of EB to assist drafting efforts (0.9); review RIOT presentations and Bates-stamped material cited by SB for accuracy at request of EB (1.7); execute agreement between Rhodium and Fulcrum at request of EB (0.5); create shared folder and link for expert [redacted] to upload and download material (0.4); gather material for use by [redacted] at request of HM (0.6); coordinate with HM, CHH, and JHA to create list of Bates-stamped material considered by [redacted] (1.4).	5.50	325.00	1,787.50
10/09/24	HM	Teleconference with EB regarding provision of documents to [redacted] (0.3); attend teleconference with JS, and [redacted], and [redacted] to discuss Rhodium's safety measure at Rockdale (0.6); attend meet-and-confer teleconference with JS, A. Swartz, P. Tomasco, and Whinstone's counsel to discuss deposition locations and outstanding document discovery issues (0.7); coordinate with CH, JHA, and AA to update Expert Shared Materials log with Bates numbers for all documents considered by [redacted] and [redacted] (4.4); review and revise [redacted] (0.5); collect and send all Rhodium safety procedures to [redacted] (0.5); coordinate with CH and MV to review and analyze documents sent from Rhodium to ensure all relevant documents are sent to [redacted] (1.0); review and respond to team correspondence regarding expert reports and depositions (2.5).	10.50	600.00	6,300.00
10/09/24	MV	Continue preparing exhibit list and trial exhibits.	6.00	400.00	2,400.00
10/10/24	VO	Review [redacted] email history and work on outline for [redacted] deposition (3.7); review 30(b)(6) notification from Whinstone and emails with JS and CH regarding next steps in light of same (0.2).	3.90	875.00	3,412.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/10/24	EB	Attend teleconference with PB, [redacted], and [redacted] regarding information to address issues identified by [redacted] (0.2); review and comment on draft [redacted] expert report including to address potential overlap with other reports (1.5); attend portion of teleconference with [redacted] regarding same (0.9); review and analyze additional analysis of evidence and testimony from TT in support of [redacted] reports (0.3); correspond with JS and A. Swartz regarding potential revisions to [redacted] (1.0); review and comment on further revised [redacted] (0.6); correspond with [redacted] regarding Fulcrum engagement (0.1); correspond with Fulcrum regarding graphic for [redacted] (0.1); attend teleconference with C. Hickey (Fulcrum) regarding same (0.5); confer with NC regarding potential revisions to [redacted] and review and incorporate same (0.2); correspond with BA, JS, PB, and HM regarding Rhodium information and strategic questions relating to potential further revisions to same (0.3); review and respond to team correspondence regarding action items including deposition coverage (0.2); attend portion of [redacted] teleconference with BA, JS, PB, HM, J. Cohn, W. Thompson, and A. Swartz (0.4); correspond with [redacted] regarding revisions to [redacted] (0.3); correspond with BA, JS, PB, HM, J. Cohn, W. Thompson, and A. Swartz regarding further revisions to same (0.2); begin revising same including to incorporate initial further revisions from [redacted] and BA (1.6).	8.40	1100.00	9,240.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/10/24	BA	Review [redacted] from [redacted] and correspond with PB regarding revisions to same (0.8); review [redacted] from [redacted] and correspond with JS regarding same (0.8); draft and revise motion for partial summary judgment (3.0); correspond with EB regarding opinion of [redacted] (0.1); participate in teleconference with [redacted] and team to discuss [redacted] (1.1); review and comment on draft report for [redacted] and correspond with EB regarding same (1.0); review Whinstone's 30(b)(6) topics, correspond with JS regarding same, and analyze potential witnesses and objections for same (0.7); review analysis from PB of potential discovery matters and correspond with PB, A. Swartz, and team regarding discovery priorities and potential compromises, and correspond with PB, team, and Whinstone's counsel regarding Whinstone's continued failure to provide verified interrogatory responses (0.3).	7.80	1050.00	8,190.00
10/10/24	JS	Prepare for and attend call with E. Winston and P. Tomasco regarding [redacted] deposition plan (0.9); confer with J. Cohn regarding same (0.3); call with [redacted] regarding [redacted] testimony (0.1); continue preparing for [redacted] deposition prep (0.3); calls with PB regarding [redacted] and discovery disputes with Whinstone (1.0); call with W. Thompson regarding same (0.5); call with [redacted] and attorney teams regarding [redacted] (1.0); attend portion of call with Stris and LKC teams regarding expert coordination (0.6); correspond with Foley regarding deposition coordination and privilege issues (0.4); advise HM regarding [redacted] (0.1); review documents related to [redacted] and [redacted] and evaluate reports in light of same (1.5); review edits to MSJ and add further revisions (1.5); review and evaluate [redacted] (0.6); review Foley 30(b)(6) notice and evaluate which witnesses to designate and potential objections (1.0).	9.00	875.00	7,875.00
10/10/24	SR	Begin drafting defensive deposition preparation [redacted].	2.20	650.00	1,430.00
10/10/24	CS	Draft opposition to Whinstone's motion for summary judgment.	8.20	725.00	5,945.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/10/24	CHH	Assist HM and MV with identification of documents for trial (3.3); attend meet and confer with PB and opposing counsel regarding document production disputes (0.8); review Whinstone's 30(b)(6) deposition notice and summarize topics in same for VO (0.3).	4.40	325.00	1,430.00
10/10/24	PB	Propose revisions to [redacted] (1.2); attend teleconference with [redacted], and EB regarding [redacted] in support of same (0.2); prepare for meet-and-confer including to analyze deficiencies in Whinstone discovery responses (1.7); attend meet-and- confer with CHH and counsel for Whinstone regarding same (0.8); attend teleconferences with JS regarding discovery issues and [redacted] (1.0); attend teleconference with [redacted] and [redacted] regarding [redacted] (1.0); confer with W. Thompson regarding same (0.3); attend teleconference with J. Cohn, A. Swartz, W. Thompson, JS, BA, EB, and HM regarding expert reports (0.7); review draft expert report of [redacted] and correspondence regarding same (0.7); review draft motion for summary judgment (0.3); correspond with BA, JS, HM, and A. Swartz regarding responses to additional discovery requests (1.1); prepare privilege log (0.6).	9.60	725.00	6,960.00
10/10/24	ASA	Create secure ShareFile link and gather site services invoices, hosting invoices, ancillary service invoices, and other miscellaneous invoices for use by [redacted] at request of HM (0.3); create ShareFile link for use by Fulcrum in preparation of graphics (0.2); review documents sent to [redacted] and confirm Bates number of produced versions (2.6).	3.10	325.00	1,007.50
10/10/24	HM	Correspond and assist BA, EB, VO, JS, PB, and LKC team with action items in support of expert reports, outstanding discovery, and deposition preparation (3.3); research objection deadlines for BA and revise, finalize, and serve Debtor's notice of 30(b)(6) deposition to Whinstone (2.1); qc documents sent to [redacted] (2.5); review and revise deposition notices (0.8); organize and send documents to [redacted] (0.2); attention to case management including deposition scheduling and qc calendaring of deadlines (0.9).	9.80	600.00	5,880.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/10/24	MV	Continue preparing exhibit list and exhibits for trial.	4.00	400.00	1,600.00
10/11/24	PS	Review [redacted] and confer with team regarding same.	.30	1250.00	375.00
10/11/24	EB	Continue revising [redacted] (5.2); advise HM and litigation fellows regarding action items in support of finalization of same including provision of additional documents to [redacted] and cite checking of [redacted] (0.6); attend teleconference with BA regarding potential further revision to [redacted] and upcoming corporate representative depositions (0.3); attend teleconference with [redacted] regarding revisions to [redacted] (0.3); review and implement edits and comments from J. Cohn regarding same (0.2); review further revisions from J. Cohn and incorporate same (1.8); correspond with Stris and LKC teams and [redacted] regarding same (0.5); attention to coordination between [redacted] including emails to PB and [redacted] (0.2); attend teleconference with JS regarding expert reports (0.3).	9.40	1100.00	10,340.00
10/11/24	BA	Review draft report for [redacted] and provide comments on same to EB (0.8); assist EB and team with identifying exhibits to [redacted] correspond with EB regarding same, confer with EB regarding same, and review and comment on further edits to same (0.9); confer with EB regarding 30(b)(6) strategy options and convey same to JS (0.3); review reply in support of motion to transfer and correspond with bankruptcy counsel regarding same (0.4); continue reviewing and revising motion for partial summary judgment, including incorporating revisions from JS and from A. Davis and M. Frederick, and correspond with CS and JS regarding next steps for same (3.1); confer with JS, PS, and HM regarding preparation and strategy for meet and confer on discovery matters with opposing counsel (0.8); continue analyzing issues for trial brief (0.3); correspond with A. Swartz regarding issue for [redacted] (0.1).	6.70	1050.00	7,035.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/11/24	JS	Attend teleconference with EB regarding [redacted] (0.3); correspond with CHH regarding overlap of Temple data room with productions (0.1); attend teleconference with CHH regarding same (0.1); advise PB regarding expert reports and discovery disputes with Whinstone (0.4); confer with BA, PB, and HM regarding outstanding discovery issues and meet and confer preparation (0.8); review and revise MSJ (1.8); review and evaluate MSJ opposition (1.0); continue preparing deposition and related trial strategy (2.9); further coordinate deposition timing and logistics (0.7); analyze and propose resolution of overlapping issues between [redacted] and [redacted] (1.1).	9.20	875.00	8,050.00
10/11/24	CHH	Download set of final, Bates-stamped contracts in suit for A. Swartz (Lehotsky) review (0.2); correspondence with ASA regarding same (0.2); meet and confer with PB and A. Howell (Foley) regarding document production disputes (1.3); continue reviewing discovery database to determine list of produced [redacted] documents and summarize findings to VO and PB (2.6); telephone call with JS regarding same (0.1); prepare sample of unproduced [redacted] documents for JS review (0.3).	4.70	325.00	1,527.50
10/11/24	JH	Update bankruptcy docket (0.8); confirm related information for HM (0.5); assist HM with transfer of additional documents to [redacted] (0.3); assist ASA with confirmation of materials sent to [redacted] (1.0); prepare additional documents for VO to assist with deposition preparation (2.5).	5.10	325.00	1,657.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/11/24	PB	Revise [redacted] regarding [redacted] (1.4); prepare for meet-and-confer with counsel for Whinstone regarding discovery issues (0.7); teleconference with AA regarding expert supporting material (0.1); teleconference with BA, JS, and AS regarding meet-and-confer preparation (0.8); teleconference with [redacted] and [redacted] regarding support for [redacted] (0.3); teleconference with supporting staff for [redacted] regarding support for draft report (0.5); meet-and-confer with counsel for Whinstone regarding document discovery issues (1.5); teleconference with [redacted] and team regarding draft report (1.0); teleconference with JHA regarding deposition preparation (0.2); conference with VO regarding case strategy (0.2); confer with MV regarding privilege logs (0.1); teleconference with JS regarding expert strategy (0.3); prepare and serve production 14 (1.4).	8.50	725.00	6,162.50
10/11/24	ASA	Confirm list of contracts previously sent to [redacted] at request of EB (0.4); search for specific provisions in said contracts at request of EB in support of report drafting (1.2); itemize by Bates number list of documents sent to [redacted] in support of report and exhibit finalization (7.6).	9.20	325.00	2,990.00
10/11/24	HM	Revise, finalize, and serve deposition notices of Kevin Haugen, David Schatz, Heath Davidson, and Jeff McGonegal (0.6); review and revise expert report of [redacted] (4.9); review and respond to team correspondence regarding scheduling and document discovery (2.2).	7.70	600.00	4,620.00
10/11/24	MV	Continue preparing and formatting privilege log (7.5); highlight descriptions for attorney review (0.5).	8.00	400.00	3,200.00
10/12/24	VO	Confer with JS regarding deposition planning, scheduling, and next steps.	.60	875.00	525.00
10/12/24	PS	Confer and email with team regarding expert reports, depositions, and trial planning.	1.50	1250.00	1,875.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/12/24	EB	Correspond with [redacted] regarding potential further revisions to ERCOT expert report (0.4); continue revising same (3.2); correspond with HM regarding cite checking and support for finalization of same (0.1); attend teleconference with PB and JS regarding reconciliation of [redacted] with [redacted] and [redacted] (0.6); correspond with PB and [redacted] regarding same (0.5); confer with J. Cohn regarding further revisions to same (0.3); create new potential exhibits for [redacted] to support [redacted] analysis and correspond with [redacted] regarding incorporation of same (0.9); attend teleconference with JS regarding high priority action items including expert report coordination and deposition coverage (0.3).	6.30	1100.00	6,930.00
10/12/24	BA	Review edits from W. Thompson and J. Cohn on motion for partial summary judgment and correspond with JS and CS regarding same (0.8); review and comment on opposition to motion for partial summary and correspond with JS regarding Whinstone's supplementation of same and communications with opposing counsel regarding deposition scheduling (0.4).	1.20	1050.00	1,260.00
10/12/24	JS	Call with VO regarding deposition of [redacted] (0.6); call with [redacted] regarding attendance at [redacted] deposition (0.1) and with P. Tomasco regarding same (0.1); call with W. Thompson regarding trial witness planning (0.2); attend portion of call with PB and EB regarding expert report on [redacted] (0.3); review and evaluate [redacted] (1.5); review [redacted] and propose questions regarding same (2.4); evaluate edits to MSJ from LKC (0.6); continue preparing trial plan (2.0).	7.80	875.00	6,825.00
10/12/24	CHH	Prepare exhibit of list of documents reviewed in preparation of [redacted] report.	1.30	325.00	422.50
10/12/24	PB	Review team correspondence regarding draft expert reports (0.2); correspond with [redacted] regarding draft report (0.8); attend teleconference with EB and JS regarding same (0.6); attend teleconference with LKC team regarding draft [redacted] report (0.4); further correspond with [redacted] and colleagues regarding revisions to draft report (0.4); revise draft privilege log in preparation for service (3.6).	6.00	725.00	4,350.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/12/24	HM	Organize documents sent to [redacted] within Expert Shared Materials spreadsheet (0.7); coordinate with CH to create Exhibit B, list of documents reviewed, for [redacted] report (0.2).	.90	600.00	540.00
10/13/24	VO	Continue to review [redacted] email history and work on outline for [redacted] deposition (7.1); emails with PB, JS, and JH regarding same (0.4).	7.50	875.00	6,562.50
10/13/24	PS	Confer and email with team regarding expert reports, depositions, and trial planning.	.80	1250.00	1,000.00
10/13/24	EB	Correspond with HM, SD, and CHA regarding cite check of materials considered exhibit for [redacted] report (0.3); review and respond to correspondence from A. Swartz, JS, and PB regarding [redacted] (0.5); attend teleconference with JS (0.1) and portion of teleconference with JS and PB (0.2) regarding same; confer with PS and JS regarding deposition and trial coverage (0.2).	1.30	1100.00	1,430.00
10/13/24	BA	Review correspondence and draft reports and correspond with JS and PB regarding strategy questions for expert reports (0.4); participate in teleconference with litigation team regarding expert reports (0.5); confer with JS and PB regarding strategy for and revisions to [redacted] (0.7); participate in teleconference with litigation team and data center expert (0.2); confer with JS and PB regarding strategy for issues in [redacted] and confer with [redacted] regarding same (1.1); review and revise motion for partial summary judgment (1); correspond with PS, JS, and EB regarding trial strategy (1).	4.00	1050.00	4,200.00
10/13/24	JS	Continue advising and assisting with revisions to [redacted] and [redacted] (5.9); review and propose revisions to [redacted] (1.1); review and revise MSJ (0.5); continue outlining for [redacted] deposition preparation (0.8); review and evaluate Rule 30(b)(6) notice and objections to same (1.0); continue [redacted] outline and adding questions to same (1.3).	10.60	875.00	9,275.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/13/24	CHH	Review [redacted] report in conjunction with exhibit of list of documents reviewed to ensure comprehensiveness (0.8); review JS emails regarding potentially important documents and review document database for same to confirm production (0.5).	1.30	325.00	422.50
10/13/24	PB	Continue working with EB, BA, JS, LKC teams, and experts to assist with final revisions to [redacted] and [redacted] (8.7); prepare draft privilege log (3.4).	12.10	725.00	8,772.50
10/13/24	HM	Draft [redacted] (1.5); revise and finalize [redacted] expert report with exhibits (1.1).	2.60	600.00	1,560.00
10/14/24	VO	Continue to prepare for [redacted] deposition preparation, including further review of documents, and identify additional documents for [redacted] deposition outline in connection with same (5.6); review and analyze 30(b)(6) topics to plan for witness preparation (0.8); confer with PB regarding same (0.3); confer with JS regarding same (0.3); prepare recommendations for additional questions and documents to be added to [redacted] and send to W. Thompson and A. Swartz (2.4).	9.40	875.00	8,225.00
10/14/24	PS	Review and comment on draft motion for summary judgment (1.8); confer with BA regarding deposition strategy (0.2); advise VO, and PB regarding [redacted] (0.3).	2.60	1250.00	3,250.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/14/24	EB	Correspond with JS regarding materials in support of expert depositions (1.2); advise HM regarding final revisions to and finalization and service of fully executed report and attachments (0.6); review correspondence from [redacted] (0.1); review and comment on portions of draft summary judgment motion (0.5); attend teleconference with BA and JS regarding deposition and trial preparation (1.2); begin preparing for [redacted] deposition preparation (4.6); correspond with A. Swartz regarding action items including equipment expert deposition preparation (0.1); review near-final equipment expert report (0.5); correspond with BA, JS, PB, and A. Swartz regarding finalization of same (0.1); attend portion of deposition preparation teleconference with BA, JS, PB, and LKC team members (0.3); review correspondence regarding [redacted] expert reports and advise JS and PB regarding same (0.4).	9.60	1100.00	10,560.00
10/14/24	BA	Continue reviewing and revising summary judgment motion and drafting and revising supporting declarations (4.0); review and comment on materials for C. Harris deposition (1.0); attend teleconference with EB and JS regarding deposition and trial planning (1.2); advise HM and A. Swartz regarding revisions to deposition preparation and tracking information (0.4); confer with PS regarding upcoming depositions (0.2); review updated report schedules from [redacted] and advise PB regarding final updates to and finalization of same (1.6); attend teleconference with PB regarding trial planning (0.5); confer with Stris and LKC teams regarding upcoming depositions and Rule 30(b)(6) objections and correspond with opposing counsel regarding same (1.2); review [redacted] conveyed by P. Tomasco, review AAA confidentiality rules, and correspond with JS and HM regarding next steps (0.5).	10.60	1050.00	11,130.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/14/24	JS	Attend teleconference with EB and BA regarding trial planning (1.2); assist W. Thompson with preparation of C. Harris deposition outline (2.5); confer with VO regarding 30(b)(6) deposition preparation (0.3); confer with J. Cohn regarding expert witness next steps (0.5); review and revise [redacted] and assist in preparing same for service (5.4); prepare for and confer with LKC team regarding Schatz and Davidson deposition preparation (1.9); continue preparing [redacted] defensive deposition materials (2.0).	13.80	875.00	12,075.00
10/14/24	CS	Draft BA declaration in support of motion for partial summary judgment and gather exhibits to accompany the same (0.9); revise [redacted] in support of same to incorporate comments from BA (0.7); review and incorporate edits to motion for partial summary judgment (1.0); continue drafting opposition to Whinstone's motion for partial summary judgment (2.9).	5.50	725.00	3,987.50
10/14/24	CHH	Finalize exhibits to [redacted] (0.7); share exhibits to motion for partial summary judgment for client review (0.1); compile produced [redacted] text messages for VO further review (0.1); finalize exhibits to [redacted] in support of motion for partial summary judgment (1.4).	2.30	325.00	747.50
10/14/24	PB	Assist in revision and finalization of expert reports including conferring with [redacted] BA, and JS regarding same (5.1); attend teleconference with BA regarding trial plan (0.5); continue preparing privilege log for service to Whinstone (5.8).	11.40	725.00	8,265.00
10/14/24	ASA	Draft expert deposition notices for HM (2.5); update case management materials and files to reflect case updates and recent correspondence (1.0); organize deposition materials for Stris and LKC teams (0.5).	4.00	325.00	1,300.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/14/24	HM	Review and respond to team correspondence regarding action items in support of finalization of expert reports (2.0); review, revise, finalize, and serve expert reports of C. Griffey, N. Miljkovic, T. Lewis, and E. Brown (5.0); advise ASA regarding notices of deposition for Whinstone experts (0.5); correspond with VO and JS regarding [redacted] deposition (0.1); update master deposition schedule (0.5).	8.10	600.00	4,860.00
10/15/24	VO	Confer with JS and [redacted] to provide update on recent developments, status of case, strategy, and next steps (0.4); attend videoconference with JS and [redacted] regarding 30(b)(6) deposition preparation (1.0).	1.40	875.00	1,225.00
10/15/24	PS	Emails with team regarding Slovack designation and next steps (0.2); review Whinstone expert reports and confer with team regarding same (1.5).	1.70	1250.00	2,125.00
10/15/24	EB	Review correspondence regarding final expert reports and documents served by Whinstone (0.1); attend teleconference with BA regarding high priority action items including potential [redacted] by [redacted] to two Whinstone experts (0.3); correspond with [redacted] regarding same, request for documents relied upon by Whinstone damages expert, and teleconferences to discuss questions in support of C. Harris deposition and [redacted] (0.2); attend teleconference with JS regarding action items including [redacted] support for C. Harris deposition and information in support of teleconference with [redacted] regarding same (0.5); correspond with JS and W. Thompson regarding documents and information in support of same (0.2); review and analyze Whinstone damages and ERCOT reports and related materials to support [redacted] (4.0); begin [redacted] same (1.2); review final Griffey excel file and correspond with BA and HM regarding production of same (0.4); review and respond to team correspondence regarding additional issues including response to request from Whinstone for next profit share calculation and hot documents for upcoming depositions (0.5).	7.40	1100.00	8,140.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/15/24	BA	Confer with EB regarding Whinstone expert reports and potential responses and rebuttal (0.4); participate in teleconference with litigation counsel to discuss preparation for offensive depositions (1.2); participate in teleconference with JS and [redacted] to discuss deposition preparation and rebuttal topics (0.5); review and analyze expert reports served by Whinstone and correspond with team and experts regarding same, including conveying Whinstone reports to Rhodium experts and correspond with AA, EB, HM, and A. Swartz as necessary to convey supporting materials from Whinstone experts to Rhodium experts and supporting materials from Rhodium experts to Whinstone (3.5); review additional edits on summary judgment motion from bankruptcy counsel and correspond with CS and JS regarding next steps to begin finalizing same (0.8); convey analysis and potential issues regarding Whinstone's disclosure of Slovak as fee witness to litigation and bankruptcy team, research same, and correspond with same and JS and PS regarding next steps (1.5); review question from client regarding updated profit share calculation and correspond with team regarding need for input from bankruptcy counsel (0.2); review Whinstone's privilege log, review draft privilege log for Rhodium, correspond with PB and JS regarding privilege and redaction issues flagged by PB, correspond with PB and EB regarding common interest privilege, and review and approve final log for service (1.5); correspond with JS regarding potential approach to objections to 30(b)(6) notice, draft objections letter, and convey same to team for review (2).	11.60	1050.00	12,180.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/15/24	JS	Confer with VO and [redacted] to provide update on recent developments, status of case, strategy, and next steps (0.4); attend portion of [redacted] prep call with LKC (1.9); attend portion of zoom with EB and W. Thompson regarding C. Harris deposition (0.4); attend portion of 30b6 deposition prep with VO and [redacted] (0.9); confer with [redacted] and BA regarding [redacted] issues in connection with C. Harris deposition (0.5); prepare for and attend planning call for depositions of McGonegal and Haugen with Stris and LKC teams (1.6); attend Rhodium weekly touchpoint call with all counsel (1.0); call with [redacted] regarding 30b6 topics and [redacted] testimony (0.5); review and evaluate 30b6 topics in connection with objection and conferral (0.3); prepare for C. Harris deposition (7.7).	15.20	875.00	13,300.00
10/15/24	CS	Revise summary judgment motion, including to incorporate edits from PS and Quinn Emanuel (7.0); continue drafting opposition to Whinstone's summary judgment motion (0.9).	7.90	725.00	5,727.50
10/15/24	CHH	Review and correspond with JS regarding documents for C. Harris (1.0); finalize exhibits to BA declaration in support of motion for partial summary judgment (1.2); cite-check and proofread N. Nichols (Rhodium) and BA declarations in support of same (0.6); attention to claw back deletions to ensure compliance with local rules (0.4); create shareable, secure links for transmission of data to C. Griffey (expert) and opposing counsel (0.2); prepare reproduction of text messages for opposing counsel (0.5).	3.60	325.00	1,170.00
10/15/24	JH	Prepare various expert materials reviewed by Whinstone experts for ShareFile delivery to Rhodium experts for HM (0.8); continue populating running internal exhibit list (3.0).	3.80	325.00	1,235.00
10/15/24	PB	Prepare, revise, finalize, and serve privilege log (4.8); prepare production of non-privileged [redacted] documents (2.1); prepare for defense of deposition of [redacted] (2.0); teleconference with A. Davis regarding expert reports (0.2); attend case team call regarding deposition preparation (1.0); review and analyze Whinstone damages expert report (1.4)	11.50	725.00	8,337.50
10/15/24	ASA	Assist BA and EB with provision of additional materials to C. Griffey (1.4); attention to organization and tracking of material sent to experts (0.3).	1.70	325.00	552.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/15/24	HM	Review and respond to team correspondence regarding deposition preparation, documents relied on by Whinstone's experts, and documents to share with [redacted] and Foley (4.4); attend teleconference with VO, JS, PB, HM, BA and J. Cohn, A. Davis, T. Disher, and M. Frederick (LKC) to discuss deposition strategy (1.3); revise, finalize, and serve deposition notices of Benjamin Gibson, Nicholas Burnett, and Richard Peters (1.0); revise deposition notices of Jeffrey Matthews and Shams Siddiqi (0.2); review and analyze correspondence with opposing counsel relating to discovery (0.8); review and analyze Whinstone's amended responses to Debtors' requests for admission (1.5).	9.20	600.00	5,520.00
10/15/24	MV	Continue reviewing documents for and updating exhibit list.	6.00	400.00	2,400.00
10/16/24	VO	Review and revise [redacted] and prepare email to team regarding next steps for same (0.6); confer with JS to get update on C. Harris deposition takeaways, discuss [redacted], and discuss [redacted] deposition preparation strategy and next steps (1.0).	1.60	875.00	1,400.00
10/16/24	EB	Begin preparing to depose Whinstone exert S. Siddiqi (ERCOT) (2.0); prepare for (0.2) and attend (0.7) teleconference with BA and [redacted] regarding [redacted] continue drafting portions of same (1.5); correspond with HM and CHH regarding management and tracking of additional documents sent to [redacted] (0.2); correspond with [redacted], BA, JS, and HM regarding additional documents and information in support of [redacted] (0.3); attend portion of teleconference with BA, PB, A. Davis, and [redacted] regarding [redacted] (0.7); correspond with [redacted], and ASA regarding confirmation of witnesses and trial attendees (0.1); correspond with BA and JS regarding update to Stris and LKC teams regarding trial graphics and hot seat vendor (0.1); review [redacted] report (0.2); review and respond to Stris team correspondence regarding high priority expert-related action items and motion for partial summary judgment (0.5).	6.50	1100.00	7,150.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/16/24	BA	Review 30(b)(6) objections from Whinstone and review and respond to team correspondence regarding same and Whinstone's privilege log (0.4); advise HM regarding cite checking and service of 30(b)(6) objection letter (0.3); correspond with EB, JS, and HM regarding questions from [redacted] (0.5) and attend portion of teleconference with EB and [redacted] to discuss [redacted] report (0.5); correspond and confer with [redacted] regarding witness list and finalization of summary judgment documents (0.1); attention to same, including correspondence with [redacted] regarding declaration and implementation of edits from bankruptcy counsel (3.2); review materials and update JS and team regarding depositions and high priority action items (0.6); correspond with M. Thomas rebarding changes to deposition schedule (0.2); review and approve service of supplementation to [redacted] report (0.1); review protective order for [redacted] and correspond with JS regarding same (0.2); correspond with PS regarding discovery issues and supplementation (0.5); continue analyzing Whinstone's damages expert report to prepare for call with Stoneturn and for deposition (1.0); participate in teleconference with PB, EB, and [redacted] to discuss responses to Whinstone's expert reports and potential rebuttal reports (0.8).	8.40	1050.00	8,820.00
10/16/24	JS	Prepare for and attend deposition of C. Harris and debrief (9.5); confer with VO regarding next steps in light of C. Harris deposition, 30b6 issues, and [redacted] deposition prep (1.0); confer with BA regarding C. Harris deposition and next steps (0.3); review N. Nichols declaration in support of MSJ (0.4); correspond with Stris, LKC, and Quinn teams regarding high priority trial preparation items and coordination with additional outside counsel and NDA (1.4); call with J. Cohn regarding deposition planning in light of witness 30b6 designations (0.3); review Whinstone 30b6 designation and objections in connection with meet and confer (0.5); review and propose revisions to [redacted] (0.7); continue preparation for [redacted] deposition (0.3).	14.40	875.00	12,600.00
10/16/24	SR	Correspond with team regarding [redacted] deposition logistics (0.5); review case file and notes in connection with preparations for the same (1.1).	1.60	650.00	1,040.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/16/24	SB	Cite check Motion for Partial Summary Judgment for CS.	4.40	325.00	1,430.00
10/16/24	CS	Continue drafting response to Whinstone's motion for partial summary judgment (1.1); review and revise Debtors' motion for partial summary judgment (4.5); review cite check of motion for partial summary judgment (.5); review finalized exhibits in support of the same (.4); review and finalize declarations in support of the same (.8); add tables to motion for partial summary judgment (.9); file sealed and unsealed versions of motion for partial summary judgment (1)	9.20	725.00	6,670.00
10/16/24	CHH	Cite-check and proofread motion for partial summary judgment (2.5); finalize new exhibits for BA declaration in support of same and proofread declaration accordingly (0.6); review and analyze documents in preparation for expert depositions and emails with EB regarding same (0.2); prepare and download documents for [redacted] for A. Swartz (Lehotsky) further review (0.4); review and organize material in preparation for [redacted] supplemental report (0.3); finalize reproduced text messages for production and confer with PB regarding same (0.3).	4.30	325.00	1,397.50
10/16/24	JH	Confer with MV regarding exhibit list (0.5); begin populating [redacted] exhibit list with bates-numbered [redacted] (1.9); prepare key pleadings from [redacted] for expert [redacted] review at HM request (0.3).	2.70	325.00	877.50
10/16/24	PB	Teleconference with [redacted], and BA regarding [redacted] (0.4); conferences with VO regarding deposition defense of [redacted] (1.4); preparation for defense of deposition of [redacted] and upcoming preparation sessions (5.0); prepare for and attend teleconference with T. Lewis regarding rebuttal report (1.1); conference [redacted] regarding discovery [redacted] (0.4); research regarding [redacted] motion (1.2); review and analyze miner expert report (0.7).	10.20	725.00	7,395.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/16/24	HM	Review documents in search of [redacted] to produce to Whinstone (4.5); finalize and serve correspondence from BA to M. Thomas regarding 30(b)(6) topics (0.2); [redacted] and serve corrected Tiffany Lewis expert report (0.3); review and respond to team correspondence regarding documents to send to experts and deposition logistics (2.2); perform fact research for BA about [redacted] and an energy use issue (2.0).	9.20	600.00	5,520.00
10/16/24	MV	Continue preparing exhibit list and exhibits for trial.	3.00	400.00	1,200.00
10/17/24	VO	Correspond with Quinn Emanuel regarding deposition scheduling.	.30	875.00	262.50
10/17/24	EB	Correspond with witnesses and Stris team regarding trial attendance (0.5); attend teleconference with [redacted] regarding same (0.2); begin preparing to depose Whinstone ERCOT expert S. Siddiqi (3.8); review and comment on draft expert rebuttal report of [redacted] regarding [redacted] and [redacted] issues (2.4); correspond with BA regarding same (0.1); correspond with BA and Stris team regarding high priority action items including potential discovery and Daubert motions (0.3).	7.30	1100.00	8,030.00
10/17/24	BA	Analyze and outline high priority discovery, trial preparation, and motion practice tasks and convey same to JS, EB, HM, and PB (0.8); prepare for (0.5), confer with JS regarding (0.3), participate in (1.0), and confer with JS to debrief (0.3) conferral conference with Whinstone's counsel regarding 30(b)(6) topics; correspond and confer with HM regarding preparation of designations and objections to 30(b)(6) topics (0.2); review, draft, correspond with JS and bankruptcy counsel regarding, and revise designations and objections to 30(b)(6) topics, and prepare draft email to opposing counsel regarding same (4.0); correspond with litigation team regarding production of underlying calculations for expert reports (0.3); review correspondence from opposing counsel regarding discovery matters, correspond and confer with PB and JS regarding responses to same, and review and edit response to same (0.6); correspond with litigation and bankruptcy team regarding hearing and trial planning (0.2); continue preparing to depose expert J. Matthews (0.8).	9.00	1050.00	9,450.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/17/24	JS	Prepare for [redacted] deposition (2.3); prepare to depose B. Gibson (4.0); evaluate power credit issues in connection with K. Haugen deposition (0.9); prepare for and attend meet and confer regarding 30b6 topics (1.8); confer with W. Thompson regarding deposition [redacted] and remaining Whinstone experts (0.9); calls with J. Cohn regarding 30b6 topic designations and objections (0.4); review and revise 30b6 topic designations and objections (2.0); confer with BA regarding 30b6 designations and objections (2.2); attend to high priority outstanding discovery matters (1.6).	16.10	875.00	14,087.50
10/17/24	CS	Continue drafting opposition to Whinstone's motion for partial summary judgment (9.7).	9.70	725.00	7,032.50
10/17/24	CHH	Compile documents for [redacted] review for deposition preparation and emails with JS regarding same (1.5); review and update matter docket (0.3); teleconference with PB and prepare supplemental text message and word native productions in light of same (0.2); prepare and email G. Gonzalez-Araiza (Lehotsky) with [redacted] (expert) [redacted] deposition preparation materials (0.1); review and edit trial exhibit list (1.8).	3.90	325.00	1,267.50
10/17/24	NC	No Charge - Research and circulate expert past transcripts; correspond with EB and MN regarding same.	2.00	325.00	N/C
10/17/24	JH	Continue populating exhibit list with Hot Docs identified by HM (4.3); update bankruptcy docket with CHH assistance (1.0).	5.30	325.00	1,722.50
10/17/24	PB	Correspondence with EB, BA, and JS regarding discovery status (0.9); correspondence with counsel for Whinstone regarding open discovery items and Whinstone discovery deficiencies (2.6); teleconference with T. Lewis regarding [redacted] (0.5); teleconference with [redacted] regarding [redacted] issues (0.3); prepare production of documents responsive to supplemental Whinstone requests (6.4); prepare for upcoming defense of deposition testimony of [redacted] (1.0)	11.40	725.00	8,265.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/17/24	HM	Begin drafting deposition outline of Benjamin Gibson (5.2); teleconference with JS about deposition preparation for [redacted] and [redacted] (1.5); finalize and serve deposition notices for Jeffrey G. Matthews and Shams Siddiqi (0.5); attend meet-and-confer with BA, JS, A. Swartz (LKC), M. Thomas and A. Howell (Foley) to discuss corporate representative topics (1.0); begin drafting objections and designations for Whinstone's corporate representative topics (2.0); meet with [redacted] to discuss [redacted] and deposition [redacted] (0.3); review and respond to team correspondence regarding court reporter services, deposition logistics, and deposition scheduling (2.5).	13.00	600.00	7,800.00
10/17/24	MV	Further review local rules and exhibit requirements and correspond with team regarding same (0.5); continue reviewing documents for inclusion on and preparing exhibit list (6.0).	6.50	400.00	2,600.00
10/18/24	VO	Participate in portion of deposition preparation session for [redacted] (2.5); debrief with PB and JS regarding same (0.5); prepare emails to [redacted] regarding deposition preparation (0.3); continue preparing for further [redacted] deposition preparation (1.4).	4.70	875.00	4,112.50
10/18/24	EB	Continue making initial proposed revisions to [redacted] (1.1); correspond with [redacted] regarding same and next steps (0.1); advise ASA regarding provision of additional documents to [redacted] and NC regarding citation checks for [redacted] (0.1); attend portion of teleconference with JS, M. Frederick, W. Thompson, A. Davis, and [redacted] regarding [redacted] issues (0.9); attend teleconference with [redacted] regarding revisions to [redacted] report (0.2); continue [redacted] same (4.7); review and respond to team correspondence regarding high priority action items including further production of documents in advance of upcoming depositions and expert reports (0.5).	7.60	1100.00	8,360.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/18/24	BA	Review draft rebuttal opinion from [redacted] and advise EB regarding revisions to same (1.0); review and revise 30(b)(6) objections and designations and correspond with litigation and bankruptcy teams regarding final revisions to same (1.5); review, revise, and draft opposition to Whinstone's motion for partial summary judgment and correspond with CS regarding same (2.8); confer with litigation and bankruptcy teams regarding trial preparation (0.9); correspond with JS, PB, and HM regarding trial support (0.1); advise VO, JS, and PB regarding discovery matters and deposition preparation for [redacted] (0.5); correspond with ASA and NC regarding deposition and trial planning and support (0.2).	7.00	1050.00	7,350.00
10/18/24	JS	Participate in portion of [redacted] deposition preparation (0.5); participate in portion of [redacted] deposition preparation (1.5); debrief with VO and PB (0.5); review and finalize objections and designations on 30b6 topics (0.4); attend call with [redacted] and LKC team regarding [redacted] programs (0.5); participate in [redacted] deposition preparation (2.4); advise HM regarding next steps in connection with same (0.2); attention to [redacted] deposition preparation (1.4); prepare to depose Gibson (4.0); research and evaluate potential privilege issues (0.4) and confer with PB regarding same (0.3).	12.10	875.00	10,587.50
10/18/24	CS	Continue drafting response to Whinstone's motion for partial summary judgment.	7.90	725.00	5,727.50
10/18/24	JH	Continue populating exhibit list with key documents used as exhibits in filed declarations.	4.70	325.00	1,527.50
10/18/24	PB	Prepare for and conduct deposition preparation session with [redacted] and VO (3.1); debrief with VO and JS regarding same (0.5); attention to discovery action items including review and analyze supplemental production of documents to Whinstone and advising HM regarding and producing same (5.5); analyze [redacted] issues at the request of JS (0.3); attend team teleconference regarding trial preparation (1.0); confer with BA, JS, and VO regarding issues for [redacted] deposition preparation (1.0).	11.40	725.00	8,265.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/18/24	ASA	Compile motion for summary judgment briefing for reference by expert [redacted] at request of EB (0.6); locate hosting service agreement document at request of co-counsel (0.6); coordinate with EB, HH, and team members to finalize rooming list for Houston trial (1.6); attend conference about trial logistics with litigation and bankruptcy teams (0.9).	3.70	325.00	1,202.50
10/18/24	HM	Assist PB in collecting, reviewing, and producing documents for production 16 (4.3); participate and assist JS with [redacted] deposition preparation (2.4); confer with Stris and LKC team members regarding trial planning (0.9); review and respond to team correspondence regarding deposition support (1.0); attention to scheduling of depositions of opposing experts (0.5).	9.10	600.00	5,460.00
10/18/24	MV	Attend teleconference with local vendor regarding trial preparation and support (0.5); continue preparing exhibit list and exhibits for trial (5.5).	6.00	400.00	2,400.00
10/19/24	VO	Continue to review and prepare outline for [redacted] deposition of [redacted], and review and analyze hot documents in connection with same (4.3); prepare email to [redacted] regarding 30(b)(6) topics and to provide update (0.1).	4.40	875.00	3,850.00
10/19/24	EB	Revise [redacted] (1.0); confer with BA, JS, and [redacted] regarding same (0.5); correspond with PB regarding [redacted] rebuttal report (0.2).	1.70	1100.00	1,870.00
10/19/24	BA	Review and [redacted] rebuttal report in consultation with [redacted] and EB (2.1); review draft rebuttal report from [redacted], convey [redacted] to PB, EB, and JS, correspond with PB regarding same, and convey same to [redacted] (1.4); correspond with CS and JS regarding summary judgment opposition and continue reviewing and revising same (1.0).	4.50	1050.00	4,725.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/19/24	JS	Work on Gibson [redacted] (5.7); work through [redacted] issues for [redacted] deposition with PB (1.7) and evaluate additional potential issues for [redacted] deposition (0.5); confer with W. Thompson regarding issue prioritization and trial planning (0.9); confer with J. Cohn regarding [redacted] issues and trial planning (0.4); confer with VO regarding depositions of [redacted], and [redacted] (0.5).	9.70	875.00	8,487.50
10/19/24	CS	Continue drafting response to Whinstone's motion for partial summary judgment.	4.30	725.00	3,117.50
10/19/24	PB	Review, analyze, and suggest revisions to draft expert report of T. Lewis (5.9); teleconference with J. Stokes regarding same (1.6).	7.50	725.00	5,437.50
10/19/24	HM	Draft deposition outline of Benjamin Gibson. (2.8).	2.80	600.00	1,680.00
10/20/24	EB	Confer with BA and [redacted] regarding [redacted] rebuttal report and continue [redacted] (1.9); correspond with BA, PB, and [redacted] regarding revisions to [redacted] rebuttal report (0.2); attend portion of teleconference with JS and LKC regarding upcoming Whinstone Rule 30(b)(6) deposition on power topics (1.1); correspond with M. Frederick regarding documents for potential use at same (0.3).	3.50	1100.00	3,850.00
10/20/24	BA	Confer with EB and [redacted] regarding rebuttal expert report (0.8); review and revise summary judgment opposition and correspond with CS regarding same (1.1); correspond with EB and JS regarding revisions to [redacted] rebuttal report (0.4); review discovery correspondence from Whinstone and correspond with team regarding same, including proposing response language (0.4); correspond with M. Frederick and team regarding Haugen deposition (0.2).	2.90	1050.00	3,045.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/20/24	JS	Prepare for deposition of B. Gibson (4.3); assist M. Frederick in preparation for deposition of K. Haugen (2.5); evaluate high priority discovery dispute and prepare plan regarding same (1.4); review and evaluate expert report of C. Griffey (0.9); evaluate contract interpretation arguments related to pricing terms (0.5); review materials in connection with preparation of [redacted] for deposition (1.1); correspond with BA regarding [redacted] report (0.2).	10.90	875.00	9,537.50
10/20/24	CS	Continue drafting response to Whinstone's motion for partial summary judgment.	6.90	725.00	5,002.50
10/20/24	PB	Propose revisions to [redacted] report of [redacted] (1.2); analyze draft report of [redacted] (.3); prepare to defend deposition of [redacted] (5.8).	7.30	725.00	5,292.50
10/21/24	VO	Attend portion of [redacted] deposition preparation session (2.7); debrief with PB regarding same and to discuss additional issues for next preparation session (0.4).	3.10	875.00	2,712.50
10/21/24	PS	Review and comment on opposition to MSJ (1.1); review and comment on expert rebuttal reports (0.8).	1.90	1250.00	2,375.00
10/21/24	EB	Further revise [redacted] including to reflect additional comments from BA, J. Cohn, and [redacted] (2.5); advise ASA regarding cite check and revisions to [redacted] exhibit and ASA and HM regarding finalization and service of same (0.5); assist BA and PB with further revisions to [redacted] regarding [redacted] report (0.7); correspond with BA and JS regarding high priority issues including potential further [redacted] document production (0.4); attend teleconference with BA, JS, VO, PB, [redacted]nson regarding same (0.5); attend portion of [redacted] deposition preparation session (1.1); review proposed final [redacted] rebuttal report and correspond with A. Swartz regarding [redacted] to same (0.9); continue preparing for Siddiqi deposition (2.2).	8.80	1100.00	9,680.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/21/24	BA	Convey and review additional research and confer with litigation and bankruptcy counsel and client regarding objection to Whinstone's demand for production of general ledgers and expansion of 30(b)(6) topics (1.6); correspond with HM regarding priority tasks including deposition outline for J. Matthews and Daubert research (0.1); review revised [redacted] report and correspond with A. Swartz regarding same (0.3); review revisions to [redacted] report and confer with EB regarding revisions and finalization of same (1.0); review draft [redacted] report and supporting [redacted] and confer with PB, EB, and A. Davis, and [redacted] regarding revisions to and finalization of same (3.0); continue reviewing and revising opposition to Whinstone's motion for summary judgment and correspond and confer with CS regarding same (2.9).	8.90	1050.00	9,345.00
10/21/24	JS	Revise Gibson deposition outline (5.7); review rebuttal report and add further questions to deposition outline (2.5); attend portion of prep session for [redacted] (1.5); attend [redacted] prep session (4.0); follow up with HM on outstanding [redacted] issues (0.7); prepare discovery correspondence regarding general ledgers and corporate designee issues (0.5).	14.80	875.00	12,950.00
10/21/24	CS	Continue revising opposition to Whinstone's motion for summary judgment (4.2); draft [redacted] declaration in support of opposition to motion for summary judgment and organize exhibits attached thereto (1.6); draft [redacted] declaration in support of opposition to motion for summary judgment and organize exhibits attached thereto (2.1).	7.90	725.00	5,727.50
10/21/24	CHH	Collect exhibit information in preparation for K. Haugen (Riot) deposition (0.1); review production correspondence and update production log accordingly (0.5).	.60	325.00	195.00
10/21/24	JH	Continue populating the internal exhibit list with MV assistance and direction.	6.00	325.00	1,950.00
10/21/24	PB	Teleconference with EB and BA regarding [redacted] report (0.5); meeting with [redacted] regarding deposition preparation (2.3); assist in [redacted] and finalization of [redacted] report of [redacted] (3.6); prepare for upcoming defense of deposition of [redacted] (5.5).	11.90	725.00	8,627.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/21/24	ASA	Proofread, cite-check, prepare list of documents considered, and attach related material before finalizing in support of [redacted] expert report.	6.60	325.00	2,145.00
10/21/24	HM	Review photos attached to messages for production (2.2); attend teleconference with [redacted], JS, and Gabriela Gonzales-Araiza (LKC) regarding deposition preparation (4.2); review and prepare documents and photos for deposition of Benjamin Gibson (2.4); review and revise Benjamin Gibson deposition outline (1.6); review and analyze notes from deposition preparation session to draft [redacted] for [redacted] deposition (1.4); coordinate with [redacted] for scheduling offensive expert depositions (0.5); review, finalize, and serve expert rebuttal reports of Tiffany Lewis, Charles Griffey, and Nenad Miljkovic (0.4); conduct research for W. Thompson about [redacted] (1.0); begin reviewing deposition transcript of Chad Harris (1.5).	14.50	600.00	8,700.00
10/21/24	MV	Continue revising exhibit list and reviewing documents for revisions to same.	6.00	400.00	2,400.00
10/22/24	VO	Attend portion of [redacted] deposition preparation session (2.2); debrief with PB regarding same (0.2); confer and correspondence with W. Thompson regarding same (0.2).	2.60	875.00	2,275.00
10/22/24	EB	Continue preparing to depose opposing expert S. Siddiqi (ERCOT) (3.9); begin preparing to depose Peters (miners) (1.1); review and correspond with PS, BA, and [redacted] regarding opposing rebuttal report of Whinstone experts S. Siddiqi and supplement of M. Matthews (0.6); confer with BA and Stris and LKC teams regarding [redacted] deposition preparation (0.2); attend teleconference with [redacted] regarding same and upcoming expert depositions (1.4); correspond with [redacted] regarding exhibit list (0.2); attention to revising, finalizing, and advising HM regarding service of [redacted] reports and accompanying [redacted] (1.8).	8.20	1100.00	9,020.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/22/24	BA	Review and analyze rebuttal reports from Whinstone (1.5); confer with EB and [redacted] regarding Whinstone rebuttal reports and deposition prep (0.8); continue reviewing, revising, and drafting opposition to Whinstone's motion for summary judgment, and correspond and confer with J. Cohn and CS regarding same (7.0); correspond with PB and T. Lewis regarding deposition preparation (0.2).	9.50	1050.00	9,975.00
10/22/24	JS	Prepare for and attend B Gibson deposition (7.6); review and revise MSJ opposition (3.1); work on [redacted] deposition defense prep (1.5); work on [redacted] deposition defense prep (0.4).	12.60	875.00	11,025.00
10/22/24	SR	Draft materials for [redacted] deposition preparation.	2.30	650.00	1,495.00
10/22/24	SB	Put together [redacted] of Whinstone's experts for EB (0.5); conduct westlaw searches for cases and opinions where experts [redacted] testimony was excluded (1.7); review dockets of cases where experts [redacted] testified and send same to EB (1.0).	3.20	325.00	1,040.00
10/22/24	CS	Continue revising opposition to Whinstone's motion for summary judgment (6.6); revise and finalize Nichols declaration in support of opposition to Whinstone's motion for summary judgment (1.1).	7.70	725.00	5,582.50
10/22/24	JH	Prepare cover sheets for exhibits to Debtor's Opposition to Whinstone's Partial Motion for Summary Judgment for CS (2.5); assist EB in proofreading expert [redacted] for Opening and Rebuttal reports (3.0); update bankruptcy docket (0.3); update MV running exhibit list with ECF numbers of those exhibits filed in bankruptcy court (2.0).	7.80	325.00	2,535.00
10/22/24	PB	Teleconferences with [redacted], JS, JC, and WT regarding deposition preparation and follow-up calls with WT and JS regarding same (7.4); teleconference with EB regarding expert depositions (0.2); prepare for upcoming defense of deposition of [redacted] (1.2); teleconference with J. Stokes regarding privilege issues (0.3); review deposition transcript of C. Harris for trial preparation (0.3).	9.40	725.00	6,815.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/22/24	HM	Attend deposition of Benjamin Gibson (5.5); conduct research on exclusion of Gibson's expert report given lack of compliance with FRCP 26(a)(2)(B)(v) and send to JS (1.0); attend teleconference with [redacted] and JS regarding deposition preparation (0.5); finalize and serve corrected reports of Charles Griffey (0.3); review and respond to team correspondence regarding deposition logistics and document discovery (0.8); continue reading deposition transcript of Chad Harris (0.5).	8.60	600.00	5,160.00
10/22/24	MV	Continue preparing and assisting PB with preparation of exhibit list and exhibits for trial.	7.00	400.00	2,800.00
10/23/24	EB	Correspond with J. Cohn regarding deposition preparation questions for [redacted] (0.3); continue preparing to depose S. Siddiqi (ERCOT) expert (5.8); correspond with MV regarding exhibit list and related action items (0.2).	6.30	1100.00	6,930.00
10/23/24	BA	Review additional edits on draft opposition to summary judgment motion from J. Cohn, W. Thompson, and JS, continue revising same, correspond with J. Cohn and with JS regarding edits to same, correspond with SB regarding cite check, correspond and confer with [redacted] regarding same, and correspond and confer with CS as needed on all issues regarding finalizing same, including final edits, cite check, exhibits, sealing, and redactions (4.5); review correspondence and related discovery motion from Whinstone, and correspond with K. Hutchins regarding same (0.4); confer with PB regarding same (0.2); confer with J. Cohn and PB regarding strategy for response (0.2); research and draft opposition to Whinstone's motion to compel and convey same to team for review, corresponding as necessary with K. Hutchins and PB regarding same (4.5); confer with JS regarding high priority action items including discovery motions (0.2); correspond and confer with EB, HM, PB, JS and A. Swartz regarding redactions issues related to power spreadsheets, as relevant to deposition preparation and expert disclosures (1).	11.00	1050.00	11,550.00
10/23/24	JS	Attend deposition of E. Brown (7.5); review and revise discovery motion and opposition (3.3); evaluate trial strategy and further deposition strategy in light of depositions so far (2.2).	13.00	875.00	11,375.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/23/24	SR	Attend teleconference with JS regarding [redacted] deposition preparations (0.1); correspond with HM regarding the same (0.1).	.20	650.00	130.00
10/23/24	SB	Cite Opposition to Whinstone's Partial Summary Judgment for CS (4.4); create calendar invites for expert deposition preparation for EB (0.2).	4.60	325.00	1,495.00
10/23/24	CS	Review and revise opposition to Whinstone's motion for summary judgment (7.1); review cite check of the same (0.4); finalize exhibits and declarations for filing (0.7); file opposition and supporting materials (0.8).	9.00	725.00	6,525.00
10/23/24	JH	Cite-check Debtors' Opposition to Whinstone's Motion for Partial Summary Judgment with SB at CS request (5.0); update bankruptcy docket (0.5); begin tagging [redacted] deposition exhibits to compare with those on MV running exhibit list (1.0).	6.50	325.00	2,112.50
10/23/24	PB	Teleconference with JS regarding response to discovery motion (0.2); teleconference with BA regarding response to discovery motion (0.3); teleconference with JS and BA regarding strategy for discovery motion response (0.1); draft motion to compel interrogatory responses (6.4); analyze deposition transcript of C. Harris for trial preparation (0.4); analyze rebuttal report of J. Matthews (1.2).	8.60	725.00	6,235.00
10/23/24	HM	Attend deposition of Dr. Eric Brown (5.5); confer with JS about deposition of Dr. Eric Brown (0.5); draft [redacted] of depositions of Eric Brown and Benjamin Gibson and circulate to [redacted] (0.5); finalize and serve letter from Debtors to Foley regarding confidentiality designations of Chad Harris's October 16, 2024 deposition (0.3); review and respond to team correspondence regarding trial exhibits and deposition logistics (1.2).	8.00	600.00	4,800.00
10/23/24	MV	Correspond with attorneys regarding trial logistics and action items and coordinate trial assignments with fellows (0.5); correspond with co-counsel regarding depositions and exhibits and update internal deposition log (0.5); prepare for teleconference with Quinn Emanuel paralegal regarding court requirements and exhibit list (1.0); further revise exhibit list and trial exhibits (6.0).	8.00	400.00	3,200.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/24/24	VO	Prepare for (1.0) and attend (4.5) deposition preparation session for [redacted]; attend portion of deposition preparation session for [redacted] (2.5).	8.00	875.00	7,000.00
10/24/24	EB	Continue preparing for (1.6) and conduct (5.8) deposition of Whinstone expert S. Siddiqi (ERCOT); summarize same for [redacted] (0.6); continue preparing to depose Whinstone expert R. Peters (miners) (0.7); correspond with J. Cohn regarding information for preparation of Rhodium expert [redacted] (0.2); correspond with opposing counsel to reiterate request for production of documents in unredacted form (0.5).	9.40	1100.00	10,340.00
10/24/24	BA	Correspond with HM, JS, PB, and EB and confer with EB regarding issues with Whinstone redactions on power spreadsheets, relevance to pending expert depositions, and potential response to opposing counsel regarding same (0.8); confer with JS regarding high priority action items including discovery motions, deposition prep and depositions (0.2); participate in teleconference with litigation team regarding preparation for [redacted] deposition and other action items including pending motions (0.5); participate in teleconference with client team, bankruptcy counsel, and [redacted] counsel for [redacted] (0.5); review, research, draft, revise, and supervise finalization of opposition to Whinstone's motion to compel and Debtors' motion to compel, including corresponding and conferring with bankruptcy counsel as needed regarding same, with HM and CS regarding finalization and filing of same, and with JH and SD regarding exhibit preparation for same (8.3); review and approve for service amended interrogatory response (0.2).	10.50	1050.00	11,025.00
10/24/24	JS	Attend update teleconference with client and attorney teams (1.0); attend preparation session for [redacted] deposition (2.0); advise PB regarding action items in support of same (0.5); prepare supplemental response to interrogatory No. 4 (0.9); continue preparing materials for [redacted] deposition preparation (1.5); attend preparation session for same (3.1); review M. Moore correspondence regarding scope of proceedings and evaluate same (0.9); prepare for discovery hearing (2.9).	12.80	875.00	11,200.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/24/24	SR	Attend teleconference with HM to discuss [redacted] deposition preparations.	.10	650.00	65.00
10/24/24	SB	No Charge - Attend Logickull training with Sophia Ho.	.70	325.00	N/C
10/24/24	CS	Finalize and file motion to compel (0.5); continue working on trial brief (0.2); review preliminary opposition to motion to assume (0.5).	1.20	725.00	870.00
10/24/24	CHH	Redline Whinstone's verified and original interrogatory responses and email PB with findings (0.3); collect and review trial exhibits (1.9).	2.20	325.00	715.00
10/24/24	JH	Prepare exhibits for the Motion to Compel Production and the Opposition to Whinstone's Motion for Partial Summary Judgment for BA.	.50	325.00	162.50
10/24/24	PB	Prepare for deposition preparation session with [redacted] (3.0); [redacted] teleconference with BA, JS, JC, WT, and VO regarding defense of deposition of [redacted] (0.5); attend deposition preparation session with [redacted] (4.8); follow-up teleconference with [redacted] regarding [redacted] issue (0.5).	8.80	725.00	6,380.00
10/24/24	HM	Review and analyze documents produced by Whinstone regarding discovery disputes and motion to compel (4.5); review, revise, and finalize motion to compel (1.0); review, revise, and finalize proposed order for hearing and order to compel (0.2); draft, finalize, and serve supplemental response to Whinstone's interrogatory 4 (1.2); review and respond to team correspondence regarding discovery disputes and upcoming hearing (1.0); finalize exhibits to motion to compel (0.2).	8.10	600.00	4,860.00
10/24/24	MV	Assist attorneys with documents for depositions (0.5); continue reviewing documents for inclusion and revising exhibit list (7.0).	7.50	400.00	3,000.00
10/25/24	VO	Attend hearing before bankruptcy judge (0.5); prepare for (1.5) and defend (5.0) A. Peloubet deposition; debrief with team regarding same (0.5).	7.50	875.00	6,562.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/25/24	EB	Review and respond to further correspondence from opposing counsel regarding production of unredacted documents (0.2); prepare materials for J. Cohn regarding [redacted] deposition preparation (1.0); correspond with J. Cohn regarding same (0.1); continue preparing to depose Whinstone expert R. Peters (miner expert) (4.6); attend teleconference with J. Cohn and [redacted] regarding deposition preparation (1.5); attend further teleconference with [redacted] regarding information for [redacted] portion of Whinstone expert Matthews deposition (0.8).	8.20	1100.00	9,020.00
10/25/24	BA	Prepare for and attend status conference (1.0); confer with JS, J. Cohn, and P. Tomasco regarding outcome of same and potential bifurcation (0.5); analyze issues and proposed correspondence to opposing counsel regarding same (0.2); confer with JS regarding same (0.3); confer with EB regarding deposition preparation for upcoming experts (0.4); review materials and prepare for Matthews deposition including corresponding with JS and HM (4.4); confer with PB to prepare for depositions of [redacted] and Matthews (0.9); advise HM regarding redactions of power spreadsheets (0.3).	8.00	1050.00	8,400.00
10/25/24	JS	Prepare for [redacted] deposition (5.4); virtually attend portions of depositions of A Peloubet and J McGonegal (3.2); confer with BA regarding [redacted] for deposition of J Matthews (0.8); prepare for and attend hearing on discovery issues (1.5); confer with team and prepare follow up correspondence regarding bifurcation (0.9); evaluate potential witness strategies in light of possible bifurcation (0.3); confer with QE team regarding [redacted] deposition (0.5); review transcript of Haugen deposition (0.6).	13.40	875.00	11,725.00
10/25/24	SR	Prepare for (3.3) and lead (1.4) deposition preparation session with [redacted], A. Swartz, and HM.	4.70	650.00	3,055.00
10/25/24	CS	Begin drafting reply in support of motion to assume (6.2); listen to hearing on emergency discovery motion (.5).	6.70	725.00	4,857.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/25/24	CHH	Review and update matter docket with latest opposition to motion for partial summary judgment filings and compile same for client review (0.5); review and collect documents in preparation for expert depositions (0.2); review and collect deposition notices in preparation for trial exhibit collection (0.3); review J. Matthews (expert)'s opening and rebuttal reports and collect all documents referenced in same for BA review in preparation for depositions (2.5); continue collecting trial exhibits (2.0).	5.50	325.00	1,787.50
10/25/24	JH	Continue updating running exhibit list.	5.80	325.00	1,885.00
10/25/24	PB	Attend hearing (0.5); prepare for deposition defense of [redacted] (1.6); defend deposition of A. Peloubet (4.8); confer with BA regarding [redacted] and Matthews depositions (0.9).	7.80	725.00	5,655.00
10/25/24	ASA	Record documents recently sent to expert C. Griffey (0.2); update [redacted] memorandum [redacted] exchanged expert reports (0.5).	.70	325.00	227.50
10/25/24	HM	Attend hearing (0.5); attend teleconference deposition preparation session of [redacted] with SR and A. Swartz (2.3); review and respond to team correspondence regarding document discovery disputes and deposition matters (2.0); review and revise [redacted] deposition preparation materials (1.5); coordinate deposition logistics with vendors and co-counsel (1.1); coordinate with AA and CH about [redacted] exhibits for Jeffrey Matthews deposition (0.4); collect spreadsheets produced by Whinstone [redacted] for deposition of Jeffrey Matthews (1.2); confer with A. Swartz via phone regarding depositions of Benjamin Gibson and Eric Brown (0.3); attention to deposition scheduling and related action items (0.5); attention to document management (0.1).	9.50	600.00	5,700.00
10/25/24	MV	Continue revising exhibit list including to reflect updated expert witness materials (5.5); correspond with team regarding exhibit list descriptions and additional trial assignments (0.5).	6.00	400.00	2,400.00
10/26/24	VO	Attend deposition preparation session for [redacted].	5.80	875.00	5,075.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/26/24	EB	Correspond with MV regarding exhibit list (0.2); correspond with JS regarding questions for [redacted] and review and analyze responses to same (0.2).	.40	1100.00	440.00
10/26/24	BA	Prepare for Matthews expert deposition, including corresponding with HM and PB regarding exhibits and deposition outline (4.5).	4.50	1050.00	4,725.00
10/26/24	JS	Prepare for deposition of [redacted].	9.70	875.00	8,487.50
10/26/24	PB	Prepare for defense of deposition of [redacted]	2.50	725.00	1,812.50
10/26/24	HM	Review, analyze, collect, and organize documents for deposition of Jeffrey Matthews (2.8); continue reviewing report of Jeffrey Matthews (1.0).	3.80	600.00	2,280.00
10/26/24	MV	Continue reviewing documents for inclusion and revising exhibit list, preparing exhibits for trial.	5.00	400.00	2,000.00
10/27/24	VO	Continue to conduct deposition preparation with JS and [redacted].	5.50	875.00	4,812.50
10/27/24	EB	Continue preparing to depose Whinstone expert R. Peters (3.5); continue preparing to defend Rhodium expert C. Griffey (3.9); confer with JS, VO, PB, and [redacted] regarding proposed bifurcation (0.2); correspond with MV and litigation fellows regarding exhibit list and deposition calendering (0.3); attend portion of [redacted] deposition preparation (0.2).	8.10	1100.00	8,910.00
10/27/24	BA	Prepare for [redacted] expert deposition (0.7); prepare for Matthews expert deposition (4.2); correspond and confer with JS regarding preparation for upcoming status conference and discovery hearing, including positions on discovery issues, and review omnibus filing from Whinstone regarding same (1.1).	6.00	1050.00	6,300.00
10/27/24	JS	Prepare for [redacted] deposition (6.3); prepare for and attend meet and confer regarding bifurcation and discovery disputes (2.3); prepare for discovery hearing (1.5); confer with client and attorney teams regarding bifurcation (0.8).	10.90	875.00	9,537.50
10/27/24	CS	Continue drafting reply in support of motion to assume.	2.70	725.00	1,957.50

Stris & Maher LLP

Invoice # 14269 November 14, 2024

Date	Tkpr	Description	Hours	Rate	Amount
10/27/24	PB	Assist JS with meet-and-confer regarding discovery status and case schedule (1.0); assist in preparation of defense of deposition of [redacted] (3.7); prepare for deposition of J. Matthews (0.8).	5.50	725.00	3,987.50
10/27/24	HM	Continue reviewing Jeffrey Matthews's expert report (0.5); update list of proposed deposition exhibits (1.0); review and analyze list of documents listed in Matthews expert report and continue drafting annotated list for BA (4.2); review transcript of Eric Brown deposition and draft errata sheet (2.5).	8.20	600.00	4,920.00
10/27/24	MV	Correspond with team regarding trial-related action items including revisions to trial exhibit descriptions (1.8); continue assisting with documents for deposition preparation (2.0); continue revising exhibit list and preparing exhibits for trial (2.2).	6.00	400.00	2,400.00
10/28/24	VO	Participate in deposition of N. Nichols.	10.50	875.00	9,187.50
10/28/24	EB	Assist BA and PB with portion of Rhodium expert [redacted] deposition preparation (3.8); prepare power credits exhibit for [redacted] expert (0.5); prepare for and assist J. Cohn and A. Swartz with [redacted] of Rhodium [redacted] expert N. Milkjovic (3.5); review and respond to team correspondence regarding issues including exhibit list and action items resulting from bifurcation and discovery hearing (0.4).	8.20	1100.00	9,020.00
10/28/24	BA	Attend status conference by remote teleconference (1.2); prepare for deposition of [redacted], including reviewing preparation [redacted] and meeting with [redacted], EB, and PB and conferring with PB (6); prepare for deposition of J. Matthews, including continuing to prepare deposition outline and corresponding with HM and PB regarding deposition topics, outline, and exhibits (2); correspond with team regarding matters related to status conference, bifurcation, and depositions (0.3); begin reviewing reply in support of motion to assume and correspond with CS regarding reply memorandum and trial brief (0.6).	10.10	1050.00	10,605.00
10/28/24	JS	Prepare for and attend N Nichols deposition (11.4); attend hearing on discovery issues (1.0); evaluate next steps on remaining depositions and implications of bifurcation (1.0).	13.40	875.00	11,725.00

Stris & Maher LLP

Invoice # 14269 November 14, 2024

Date	Tkpr	Description	Hours	Rate	Amount
10/28/24	SR	Continue preparing for [redacted] deposition preparation session.	2.90	650.00	1,885.00
10/28/24	SB	Assist MV with revisions to trial and deposition exhibit list (4.1); pull documents for MV for exhibits folder (0.4).	4.50	325.00	1,462.50
10/28/24	CS	Analyze hearing on motions to compel and bifurcation of trial and continue drafting trial brief (1.0); continue drafting reply in support of motion to assume (3.7); review and analyze case law relevant to the same (4.1).	8.80	725.00	6,380.00
10/28/24	CHH	Review deposition transcripts and collect documents referenced in same for trial exhibit purposes.	2.30	325.00	747.50
10/28/24	JH	Update final exhibit titles for exhibits in running exhibit list (2.0); Begin creating exhibit covers [redacted] (2.5).	4.50	325.00	1,462.50
10/28/24	PB	Assist BA with preparation for deposition of J. Matthews (2.0); attend hearing on discovery motions (1.0); confer with BA, EB, [redacted], and [redacted] regarding defense of deposition of [redacted] (6.5); attend teleconference with A. Davis regarding [redacted] deposition preparation (0.5).	10.00	725.00	7,250.00
10/28/24	ASA	Update contact list and running matter status memorandum (0.4); assist with trial exhibit list preparation (0.8).	1.20	325.00	390.00
10/28/24	HM	Attend emergency motion teleconference before Judge Perez (1.0); continue reviewing and analyzing documents to create an annotated list of documents for the Jeffrey Matthews [redacted] (3.7); draft portion of Jeffrey Matthews deposition outline (3.2); review and respond to team correspondence regarding the trial exhibit list and deposition logistics (1.3).	9.20	600.00	5,520.00
10/28/24	MV	Correspond with legal assistants regarding outstanding trial assignments regarding exhibit list and related tasks (0.5); continue revising exhibit list and preparing exhibits for trial (6.5).	7.00	400.00	2,800.00
10/29/24	VO	Prepare for (2.2) and attend (4.0) deposition preparation session for [redacted].	6.20	875.00	5,425.00

Stris & Maher LLP

Invoice # 14269 November 14, 2024

Date	Tkpr	Description	Hours	Rate	Amount
10/29/24	EB	Prepare portion of Whinstone damages expert deposition outline for BA (3.3); review rough transcript of T. Lewis deposition and confer with BA and PB regarding same (1.0); review and respond to correspondence regarding order on motion to compel and resulting document production (0.2); advise HM and ASA regarding updates to trial travel and housing arrangements resulting from bifurcation order (0.1); correspond with HM and ASA regarding response to request for documents from bankruptcy counsel (0.1); advise MV regarding updates and revisions to exhibit list and potential sealing of portions of same (0.6).	5.30	1100.00	5,830.00
10/29/24	BA	Prepare for deposition of J. Matthews, including [redacted] and conferring with PB and JS (4.4); prepare for and attend deposition of T. Lewis (5); confer with [redacted] to prepare for Matthews deposition (0.8); participate in client call with litigation counsel and bankruptcy counsel (0.8); correspond with team and CS regarding sealing issues as related to exhibit list and regarding late productions from Whinstone and possible responses to same (0.4).	11.40	1050.00	11,970.00
10/29/24	JS	Assist with [redacted] prep (2.6); assist with [redacted] prep (1.5); assist with [redacted] prep (2.0); evaluate arguments regarding profit share calculations (8.3).	14.40	875.00	12,600.00
10/29/24	SR	Prepare for (2.5) and lead (4.4) deposition preparation session for [redacted] with VO.	6.80	650.00	4,420.00
10/29/24	SB	Assist MV with revisions to trial and deposition exhibit list (4.1); update exhibits folder (0.4).	4.50	325.00	1,462.50
10/29/24	CS	Continue drafting trial brief (5.4); correspond with MV regarding identifying and sealing certain trial exhibits (0.3).	5.70	725.00	4,132.50
10/29/24	CHH	Prepare trial exhibits, and review and analyze deposition transcripts for same.	4.00	325.00	1,300.00
10/29/24	JH	Continue creating exhibit covers [redacted].	3.00	325.00	975.00
10/29/24	PB	Prepare for deposition of T. Lewis (1.0); defend deposition of T. Lewis (4.3); prepare for deposition of J. Matthews (4.9).	10.20	725.00	7,395.00
10/29/24	ASA	Attention to trial and accommodation logistics (0.9); assist with trial exhibit list preparation (1.6).	2.50	325.00	812.50

Stris & Maher LLP

Invoice # 14269 November 14, 2024

Date	Tkpr	Description	Hours	Rate	Amount
10/29/24	HM	Revise deposition [redacted] of [redacted] (2.2); organize proposed Matthews deposition exhibits for printing and update corresponding tab index (1.4); begin reviewing deposition [redacted] of [redacted] (1.6); review and respond to team correspondence regarding document discovery and upcoming depositions (2.1).	7.30	600.00	4,380.00
10/29/24	MV	Continue preparing exhibit list and exhibits (6.1); attention to preparation for filing of sealed exhibits and qc for related issues (0.9).	7.00	400.00	2,800.00
10/30/24	VO	Defend deposition of B. Cottrell.	5.50	875.00	4,812.50
10/30/24	PS	Review Whinstone reply in support of MSJ.	.40	1250.00	500.00
10/30/24	EB	Attend teleconference with CS, HM, MV, and CHH regarding updates and revisions to exhibit list (1.1); review draft list and identify additional exhibits for phase 2 only (1.0); confer with BA and A. Swartz regarding expert deposition updates and review portions of rough transcripts of same (0.5).	2.60	1100.00	2,860.00
10/30/24	BA	Prepare for deposition of J. Matthews (2.6); attend and take same (7.2); confer with EB regarding Matthews deposition (0.2); confer with JS and PB regarding trial preparation (0.5); correspond with JS and PB regarding pretrial motion filings and with JS regarding strategy for high priority action items (0.5); review and revise reply in support of motion to assume (0.9).	11.90	1050.00	12,495.00
10/30/24	JS	Attend portions of B Cottrell deposition (2.5); attend teleconference with BA and PB regarding trial preparation (0.5); work on trial presentation (6.7); evaluate next steps for briefing and trial preparation in light of end of depositions (1.3); review trial brief (0.7) and reply in support of motion to assume (0.6); review Whinstone summary judgment briefing (1.0) and evaluate responses to same (1.2).	14.50	875.00	12,687.50
10/30/24	SR	Attend and assist VO with B. Cottrell deposition.	5.60	650.00	3,640.00
10/30/24	SB	Assist MV with updates to trial and deposition exhibit list (3.7); attend and assist VO and SR with exhibits for B. Cottrell deposition (0.9).	4.60	325.00	1,495.00

Stris & Maher LLP

Invoice # 14269 November 14, 2024

Date	Tkpr	Description	Hours	Rate	Amount
10/30/24	CS	Review and analyze Whinstone's reply in support of motion for partial summary judgment (0.8); attend teleconference with EB, HM, MV, and CHH regarding updates and revisions to exhibit list (1.1); continue drafting trial brief (4.1); review and analyze transcript of hearing on motion to [redacted] in [redacted] (1.5).	7.50	725.00	5,437.50
10/30/24	CHH	Review and analyze general ledger documents for production (0.5); finalize production for same and confer with PB accordingly (0.3); attend teleconference with EB, CS, HM, and MV regarding trial exhibit collection and preparation (1.1).	1.90	325.00	617.50
10/30/24	JH	Assist MV with confidentiality updates and sealing designations for exhibit list (3.0); prepare documents for HM to send to client (0.5).	3.50	325.00	1,137.50
10/30/24	PB	Prepare for deposition of J. Matthews (1.2); attend and assist BA with same (6.4); attend teleconference with BA and JS regarding trial preparation (0.5).	8.10	725.00	5,872.50
10/30/24	ASA	Assist with trial exhibit list preparation (1.8); attention to document management including of supplemental discovery responses (0.5).	2.30	325.00	747.50
10/30/24	HM	Attend teleconference with EB, CS, MV, and CHH to discuss revisions and updates to the exhibit list (1.1); review and respond to team correspondence regarding discovery responses (0.5); review, analyze, and collect documents for exhibit list and client review (5.5); attend meet-and-confer with opposing counsel (0.3); review and respond to client inquiry regarding discovery (0.4).	8.00	600.00	4,800.00
10/30/24	MV	Attend team teleconference regarding exhibit list (1.1); continue preparing and updating same and exhibits in preparation for trial (6.9).	8.00	400.00	3,200.00
10/31/24	EB	Review correspondence from Fulcrum and correspond with BA and JS regarding trial graphics (0.2); advise PB and correspond with Stris team regarding exhibit list revisions (0.5); correspond with PB, HM, and A. Swartz regarding Siddiqi deposition confidentiality designations (0.1).	.80	1100.00	880.00

Stris & Maher LLP

Invoice # 14269 November 14, 2024

Date	Tkpr	Description	Hours	Rate	Amount
10/31/24	BA	Continue reviewing and revising draft reply brief in support of motion to assume and confer JS and CS regarding same (2.5); correspond with litigation team regarding exhibit list and motion practice (0.2).	2.70	1050.00	2,835.00
10/31/24	JS	Prepare for and confer with BA and CS regarding trial brief, reply in support of assumption, and reply in support of MSJ (1.3); attend teleconference with opposing counsel regarding scheduling of phase 2 (0.4); attend teleconference with SMLLP and LKC teams and [redacted] regarding [redacted] questions (1.0); confer with W. Thompson (0.5) and PB (0.3) regarding motions in limine; draft outlines of same (0.6); begin outlining opening (2.0); review and revise Daubert motion regarding Gibson (1.4).	7.50	875.00	6,562.50
10/31/24	SB	Assist MV with updates to trial exhibit list.	5.10	325.00	1,657.50
10/31/24	CS	Continue drafting trial brief and confer with JS and BA regarding same and reply in support of moton to assume (4.3); review and analyze Whinstone's opposition to Debtors' motion for partial summary judgment (0.8).	5.10	725.00	3,697.50
10/31/24	CHH	Continue assisting PB and MV with updates and revisions to trial exhibit list and reviewing and analyzing deposition transcripts for same.	4.50	325.00	1,462.50
10/31/24	JH	Assist PB and MV with exhibit list including confidentiality assessment and replacement of slip-sheets of email attachments with native versions.	3.00	325.00	975.00
10/31/24	PB	Analyze Whinstone claims regarding unpaid invoices (1.0); attend teleconference with Stris and LKC teams and [redacted] regarding [redacted] documentation and [redacted] questions (1.0); attend teleconference with A. Swartz regarding Miljkovic deposition exhibits (0.2); continue preparing trial exhibit list, advising MV regarding revisions, and analyzing documents for inclusion on same (4.2).	6.40	725.00	4,640.00
10/31/24	ASA	Assist MV and CHH with trial exhibit preparation (1.7); correspond with Stris and LKC teams and vendors regarding deposition and trial support logistics (0.4).	2.10	325.00	682.50

Stris & Maher LLP

Invoice # 14269 November 14, 2024

Date	Tkpr	Description	Hours	Rate	Amount
10/31/24	HM	Review and analyze documents reviewed by experts to be included on exhibit list (2.9); review and respond to team correspondence regarding contention interrogatories and post-deposition tasks (1.3); attend meet-and-confer with P. Tomasco (Quinn), and opposing counsel (0.3); review and analyze deposition transcripts of E. Brown and B. Gibson for confidentiality designations and draft correspondence regarding designations (3.5); begin reviewing and analyzing deposition transcript of N. Nichols for confidentiality designations (1.1).	9.10	600.00	5,460.00
10/31/24	MV	Continue preparing and revising trial exhibits and exhibit list in preparation for trial.	7.00	400.00	2,800.00
		TOTAL PROFESSIONAL SERVICES			**$ 1,515,785.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	19.90	1,250.00	24,875.00
Elizabeth Brannen	EB	Partner	179.40	1,100.00	197,340.00
Bridget Asay	BA	Partner	219.00	1,050.00	229,950.00
Victor O'Connell	VO	Partner	95.40	875.00	83,475.00
John Stokes	JS	Partner	355.20	875.00	310,800.00
Colleen Smith	CS	Associate	177.30	725.00	128,542.50
Peter Brody	PB	Associate	267.30	725.00	193,792.50
Sarah Rahimi	SR	Associate	68.60	650.00	44,590.00
Helen Marsh	HM	Associate	240.70	600.00	144,420.00
Tanya Tice	TT	Discovery Associate	43.50	480.00	20,880.00
Monica Viramontes	MV	Sr Paralegal	146.50	400.00	58,600.00
Andrew Atsalis	ASA	Fellow	62.20	325.00	20,215.00
Cynthia Huang	CHH	Fellow	57.00	325.00	18,525.00
Shayra Banta	SB	Fellow	37.70	325.00	12,252.50
Jaida Hodge-Adams	JH	Fellow	84.70	325.00	27,527.50
Total			**2,054.40**		**$ 1,515,785.00**

Stris & Maher LLP

Invoice # 14269 November 14, 2024

EXPENSES ADVANCED

Date	Task	Description	Amount
10/01/24		Logikcull Discovery Solutions (October 2024).	2,646.00
10/08/24		SETEC Investigations - Mounted Acquistion of 3 cell phones to preform keyword searches.	3,599.00
10/09/24		Fulcrum Legal Graphics - Retainer for trial support Graphics support.	15,000.00
10/18/24		StoneTurn - September 2024 services.	47,600.00
10/24/24		E. Brown invoice for deposition prep, deposition attendance and retainer for trial.	48,056.25
		TOTAL EXPENSES ADVANCED	**$ 116,901.25**
		TOTAL THIS INVOICE	**$ 1,632,686.25**

Stris & Maher LLP

Invoice # 14269 November 14, 2024

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14249	11/01/24	79,868.00	.00	79,868.00
14263	11/04/24	1,139,238.00	.00	1,139,238.00
		Previous Balance		$ 1,219,106.00
		Balance Due This Invoice		$ 1,632,686.25
		TOTAL BALANCE DUE		**$ 2,851,792.25**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
1,219,106.00	$ .00	$ .00	$ .00	$$.00	1,219,106.00

Stris

November 8, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14284
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through October 31, 2024

RE: Retention and Fee Applications

Total Professional Services	$ 12,985.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 12,985.00**
Previous Balance	$ 47,165.00
TOTAL BALANCE DUE	**$ 60,150.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14284 November 8, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
10/17/24	VO	Correspond with Quinn Emanuel regarding fee application process (0.1); begin preparing same (0.8); advise CH regarding instructions on preparation of portion of fee application (0.5).	1.40	875.00	1,225.00
10/17/24	PS	Confer with VO regarding fee application process and next steps.	.40	1250.00	500.00
10/17/24	CHH	Confer with VO regarding preparation of fee application (0.5); begin preparing portion of same (0.3).	.80	325.00	260.00
10/18/24	CHH	Continue drafting fee application.	6.50	325.00	2,112.50
10/21/24	VO	Confer with EB, CH, and Quinn Emanual regarding best-practices for and preparation of fee application.	.40	875.00	350.00
10/21/24	CHH	Continue drafting portion of monthly fee statement (2.6); confer with VO regarding same (0.2).	2.80	325.00	910.00
10/22/24	VO	Continue preparing portion of and advise EB and J. Richards regarding fee application.	.40	875.00	350.00
10/22/24	EB	Begin preparing portions of monthly fee application.	1.60	1100.00	1,760.00
10/23/24	EB	Continue preparing portions of monthly fee application (1.0); confer with PS, VO, and B. Howell (QE) regarding same (0.5).	1.50	1100.00	1,650.00
10/24/24	EB	Advise NC regarding preparation of portions of monthly fee statement.	.20	1100.00	220.00
10/24/24	NC	Assist EB with preparation of portion of monthly fee statement.	2.10	325.00	682.50
10/25/24	EB	Continue preparing portions of monthly fee statement.	.50	1100.00	550.00
10/30/24	EB	Prepare portion of August fee statement.	1.70	1100.00	1,870.00
10/31/24	EB	Advise NC regarding preparation of portion of August fee statement.	.20	1100.00	220.00
10/31/24	NC	Assist EB with preparation of portion of August fee statement.	1.00	325.00	325.00

TOTAL PROFESSIONAL SERVICES **$ 12,985.00**

Stris & Maher LLP

Invoice # 14284 November 8, 2024

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	.40	1,250.00	500.00
Elizabeth Brannen	EB	Partner	5.70	1,100.00	6,270.00
Victor O'Connell	VO	Partner	2.20	875.00	1,925.00
Cynthia Huang	CHH	Fellow	10.10	325.00	3,282.50
Nicholas Capalbo	NC	Fellow	3.10	325.00	1,007.50
Total			**21.50**		**$ 12,985.00**

TOTAL THIS INVOICE **$ 12,985.00**

Stris & Maher LLP

Invoice # 14284 November 8, 2024

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14261	11/04/24	47,165.00	.00	47,165.00

Previous Balance	$ 47,165.00
Balance Due This Invoice	$ 12,985.00
TOTAL BALANCE DUE	**$ 60,150.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 47,165.00	$ .00	$ .00	$ .00	$ .00	$ 47,165.00

Stris

November 14, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14295
Client # 00346
Matter # 008

INVOICE SUMMARY

For professional services rendered through October 31, 2024

RE: Non-working Travel for Whinstone Dispute

Total Professional Services	$ 68,292.50
50% discount	$ -34,146.25
Net Professional Services	$ 34,146.25
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 34,146.25**

Stris & Maher LLP

Invoice # 14295 November 14, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
10/23/24	VO	Travel LAX-DAL for deposition of A. Peloubet.	6.50	875.00	5,687.50
10/23/24	PB	Travel to Dallas to defend deposition of A. Peloubet.	2.70	725.00	1,957.50
10/25/24	PB	Travel to Los Angeles from Dallas deposition of A. Peloubet.	5.30	725.00	3,842.50
10/26/24	VO	Travel DAL-HOU for N. Nichols deposition prep and deposition.	4.50	875.00	3,937.50
10/27/24	EB	Travel to Houston for expert depositions.	4.00	1100.00	4,400.00
10/27/24	BA	Travel from Montpelier, VT to Houston, TX .	4.00	1050.00	4,200.00
10/27/24	JS	Travel to Houston for N. Nichols deposition.	2.50	875.00	2,187.50
10/27/24	PB	Travel to Houston for deposition of T. Lewis.	7.60	725.00	5,510.00
10/28/24	JS	Travel home from Houston following N. Nichols deposition.	4.50	875.00	3,937.50
10/28/24	SR	Travel from Los Angeles to Austin for B. Cottrell deposition.	6.20	650.00	4,030.00
10/29/24	EB	Return travel from Houston for expert depositions.	2.20	1100.00	2,420.00
10/29/24	BA	Travel from Houston to Dallas for Matthews deposition.	2.80	1050.00	2,940.00
10/29/24	VO	Travel from Houston to Austin for B. Cottrell deposition preparation and deposition.	3.30	875.00	2,887.50
10/29/24	PB	Travel from Houston to Dallas for deposition of J. Matthews	1.90	725.00	1,377.50
10/30/24	VO	Return travel following depositions AUS-SNA.	6.00	875.00	5,250.00
10/30/24	PB	Return travel from Dallas to Los Angeles following deposition of J. Matthews.	5.50	725.00	3,987.50
10/30/24	SR	Travel from Austin to Los Angeles following B. Cottrell deposition.	8.20	650.00	5,330.00
10/31/24	BA	Travel from Dulles Airport (DC) to Montpelier, VT, completion of return travel from depositions of T. Lewis and J. Matthews.	4.20	1050.00	4,410.00

TOTAL PROFESSIONAL SERVICES	**$ 68,292.50**
50% discount	$ -34,146.25
NET PROFESSIONAL SERVICES	**$ 34,146.25**

Stris & Maher LLP

Invoice # 14295 November 14, 2024

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	6.20	1,100.00	6,820.00
Bridget Asay	BA	Partner	11.00	1,050.00	11,550.00
Victor O'Connell	VO	Partner	20.30	875.00	17,762.50
John Stokes	JS	Partner	7.00	875.00	6,125.00
Peter Brody	PB	Associate	23.00	725.00	16,675.00
Sarah Rahimi	SR	Associate	14.40	650.00	9,360.00
Total			**81.90**		**$ 68,292.50**

TOTAL THIS INVOICE **$ 34,146.25**

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

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

STRIS & MAHER LLP'S THIRD MONTHLY FEE STATEMENT
FOR THE PERIOD NOVEMBER 1, 2024, THROUGH NOVEMBER 30, 2024

Stris & Maher LLP ("Stris & Maher") submits, pursuant to the Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the "Interim Compensation Order") (ECF No. 264) entered on October 14, 2024, this monthly fee statement for the payment of interim compensation rendered and reimbursement of expenses incurred during the period November 1, 2024 through November 30, 2024 (the "Second Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $719,844.00 (80% of the services rendered), plus $382,654.12 (100% of the interim expenses incurred). *See* Interim Compensation Order at ¶ 1(a). Summaries of the fees and expenses are attached as Exhibits 1, 2, and 3. Invoices reflecting detailed time entries are attached hereto as Exhibit 4.

[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), 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.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall serve within 14 days after delivery of the Second Monthly Fee Statement a written notice, via email, upon Stris & Maher and each of the other Fee Notice Parties (as listed below) (the "Written Notice"). The Written Notice shall set forth with reasonable detail the nature of the objection and the amount at issue. If the parties are unable to reach a resolution of the objection within 14 calendar days, the objecting party shall file its objection (the "Objection") with this Court within 3 business days and serve such Objection on Stris & Maher and each of the other Fee Notice Parties. See Interim Compensation Order ¶ 1(c).

The Fee Notice Parties as defined in the Interim Compensation Order are:

a. Rhodium Enterprises, Inc., Attn: Charles Topping (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 2617 Bissonnet Street, Suite 234, Houston, Texas 77005;

b. Debtors' Bankruptcy Counsel, c/o Quinn Emanuel Urquhart & Sullivan, LLP, Attn: Patricia B. Tomasco (pattytomasco@quinnemanuel.com); Razmig Izakelian (razmigizakelian@quinnemanuel.com), Alain Jaquet (alainjaquet@quinnemanuel.com), and Joanna D. Caytas (joannacaytas@quinnemanuel.com), 700 Louisiana, Suite 3900, Houston, Texas 77002;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (mrobinson@provincefirm.com); David Dunn (ddunn@provincefirm.com); Kirsten Lee (klee@province.com); and Andrew Popescu (apopescu@provincefirm.com), 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074;

d. Galaxy Digital, LLC, in its capacity as DIP Agent, c/o Orrick, Herrington & Sutcliffe LLP, Ryan C. Wooten (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 51 West 52nd Street, New York, New York 10019;

e. Counsel or proposed counsel to any statutory committee appointed in these Chapter 11 Cases; and

f. United States Trustee, Ha Minh Nguyen (ha.nguyen@usdoj.gov), 515 Rusk, Suite 3516, Houston, Texas 77002.

If no objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Stris & Maher an amount equal to 80% of the fees and 100% of the expenses listed herein, or if an objection is timely served, such percentage of fees and expenses that are not subject to an objection, as stated in the Interim Compensation Order.

Respectfully submitted this 23rd day of December, 2024.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
Patricia B. Tomasco (SBN 01797600)
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Cameron Kelly (SBN 24120936)
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-and-

STRIS & MAHER LLP

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Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on December 23, 2024, a true and correct copy of the foregoing Monthly Fee Statement was served through the Court's Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco
Patricia B. Tomasco

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	0.60	$660.00	$528.00
002	Temple Green Data Matter	19.20	$16,800.00	$13,440.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	1209.70	$804,262.50	$643,410.00
007	Retention and Fee Applications	46.5	$46,190.00	$36,952.00
008	Non-working Travel for Whinstone Dispute	100.60	$31,892.50	$25,514.00
Total		1376.60	$899,805.00	$719,844.00

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,100.00	0.60	$660.00

Temple Green Data Matter

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Victor O'Connell	Partner	2012	$875.00	19.20	$16,800.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,100.00	15.20	$16,720.00
Bridget Asay	Partner	1997	$1,050.00	164.40	$172,620.00
Victor O'Connell	Partner	2012	$875.00	62.60	$54,775.00
John Stokes	Partner	2016	$875.00	192.70	$168,612.50
Colleen Smith	Associate	2015	$725.00	56.40	$40,890.00
Peter Brody	Associate	2016	$725.00	179.90	$130,427.50
Sarah Rahimi	Associate	2019	$650.00	8.30	$5,395.00
Helen Marsh	Associate	2024	$600.00	133.30	$79,980.00
Monica Viramontes	Senior Paralegal	N/A	$400.00	78.00	$31,200.00
Andrew Atsalis	Litigation Fellow	N/A	$325.00	105.60	$34,320.00
Cynthia Huang	Litigation Fellow	N/A	$325.00	116.30	$37,797.50
Sebastian Delgado	Litigation Fellow	N/A	$325.00	8.30	$2,697.50
Shayra Banta	Litigation Fellow	N/A	$325.00	8.70	$2,827.50
Jaida Hodge-Adams	Litigation Fellow	N/A	$325.00	80.00	$26,000.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Peter K. Stris	Founding Partner	2001	$1,250.00	1.20	$1,500.00
Elizabeth Brannen	Managing Partner	2001	$1,100.00	35.90	$39,490.00
Victor O'Connell	Partner	2012	$875.00	3.90	$3,412.50
Andrew Atsalis	Litigation Fellow	N/A	$325.00	3.40	$1,105.00
Cynthia Huang	Litigation Fellow	N/A	$325.00	0.90	$292.50
Nicholas Capalbo	Litigation Fellow	N/A	$325.00	1.20	$390.00

Non-Working Travel for Whinstone Dispute[2]

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Bridget Asay	Partner	1997	$1,050.00	16.20	$17,010.00
Victor O'Connell	Partner	2012	$875.00	10.70	$9,362.50
John Stokes	Partner	2016	$875.00	9.90	$8,662.50
Peter Brody	Associate	2016	$725.00	11.10	$8,047.50
Helen Marsh	Associate	2024	$600.00	13.00	$7,800.00
Andrew Atsalis	Litigation Fellow	N/A	$325.00	16.50	$5,362.50
Cynthia Huang	Litigation Fellow	N/A	$325.00	12.20	$3,965.00
Jaida Hodge-Adams	Litigation Fellow	N/A	$325.00	11.00	$3,575.00
Total after 50% discount					$31,892.50

[2] Stris & Maher has billed its time for travel in connection with the Whinstone dispute during which no work was performed on a separate invoice at a 50% discount.

EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
E-discovery platform fees	$3,765.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
E-discovery platform fees	$6,411.00
Court reporter services	$60,121.20
Travel	$160,114.07
Expert fees	$133,015.75
Trial graphics and hot-seat operator	$19,227.10
Total	$378,889.12

EXHIBIT 4

Stris

December 19, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14330
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through November 30, 2024

RE: Midas Green Litigation

Total Professional Services	$ 660.00
Total Expenses Advanced	$ 3,765.00
TOTAL THIS INVOICE	**$ 4,425.00**
Previous Balance	$ 501.00
TOTAL BALANCE DUE	**$ 4,926.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14330 December 19, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
11/12/24	EB	Correspond with M. Soule regarding [redacted] (0.1); correspond with former patent counsel G. Cutri and Rhodium regarding [redacted] (0.1).	.20	1100.00	220.00
11/26/24	EB	Attend teleconference with C. Topping and C. Blackmon regarding [redacted].	.40	1100.00	440.00
		TOTAL PROFESSIONAL SERVICES			**$ 660.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	.60	1,100.00	660.00
Total			**.60**		**$ 660.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
10/31/24		JND eDiscovery - October invoice.	3,765.00
		TOTAL EXPENSES ADVANCED	**$ 3,765.00**
		TOTAL THIS INVOICE	**$ 4,425.00**

Stris & Maher LLP

Invoice # 14330 December 19, 2024

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14251	11/01/24	855.00	684.00	171.00
14257	11/04/24	8,190.00	8,058.00	132.00
14283	11/14/24	4,755.00	4,557.00	198.00

Previous Balance	$ 501.00
Balance Due This Invoice	$ 4,425.00
TOTAL BALANCE DUE	**$ 4,926.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 501.00	$ .00	$ .00	$ .00	$ 501.00

Stris

December 19, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14316
Client # 00346
Matter # 002

INVOICE SUMMARY

For professional services rendered through November 30, 2024

RE: Temple Green Data Litigation

Total Professional Services	$ 16,800.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 16,800.00**
Previous Balance	$ 5,634.50
TOTAL BALANCE DUE	**$ 22,434.50**

Electronic Invoice

Stris & Maher LLP

Invoice # 14316 December 19, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
11/06/24	VO	Confer with client representatives regarding client request for research regarding lease provision.	.40	875.00	350.00
11/07/24	VO	Emails with client representatives regarding [redacted] questions.	.10	875.00	87.50
11/08/24	VO	Review and analyze potential claims for [redacted] (0.3); prepare email to Rhodium client representatives regarding same (0.1).	.40	875.00	350.00
11/11/24	VO	Review letter from TGD and prepare draft response (2.7); emails with P. Tomasco regarding same (0.1); confer and calls with client in-house counsel regarding same (0.1).	2.90	875.00	2,537.50
11/17/24	VO	Review and analyze letter from counsel for TGD and prepare email to P. Tomasco and client representatives regarding same (1.3); review draft response to TGD sealed motion (0.3).	1.60	875.00	1,400.00
11/18/24	VO	Confer with C. Topping regarding [redacted].	.20	875.00	175.00
11/19/24	VO	Review operative lease and prepare email to Rhodium representative (0.2).	.20	875.00	175.00
11/20/24	VO	Emails with Rhodium representative and Quinn Emanuel regarding analysis of [redacted] lease (0.5).	.50	875.00	437.50
11/21/24	VO	Review and comment on purchase sale agreement (0.5); confer with P. Tomasco regarding preparation of cross-examination for upcoming [redacted] testimony (0.2); prepare cross-examination [redacted] (3.3); emails with B. Howell regarding exhibits for same (0.2).	4.20	875.00	3,675.00
11/24/24	VO	Continue to prepare cross-examination [redacted] and evaluate strategy for hearing in light of progress on same (7.3); emails with P. Tomasco regarding same (0.4); emails with Rhodium representative regarding same (0.1).	7.80	875.00	6,825.00
11/26/24	VO	Attend bid confirmation hearing (0.8) and update internal team regarding same (0.1).	.90	875.00	787.50
		TOTAL PROFESSIONAL SERVICES			**$ 16,800.00**

[redacted]

[redacted]

[redacted]

[redacted]

Name	Tkpr	Title	Hours	Rate	Total
Victor O'Connell	VO	Partner	19.20	875.00	16,800.00
Total			**19.20**		**$ 16,800.00**

TOTAL THIS INVOICE **$ 16,800.00**

Stris & Maher LLP

Invoice # 14316 December 19, 2024

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14247	11/01/24	7,190.00	5,752.00	1,438.00
14259	11/04/24	15,300.00	12,240.00	3,060.00
14268	11/14/24	5,682.50	4,546.00	1,136.50

Previous Balance	$ 5,634.50
Balance Due This Invoice	$ 16,800.00
TOTAL BALANCE DUE	**$ 22,434.50**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 5,634.50	$ .00	$ .00	$ .00	$ 5,634.50

Stris

December 19, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14317
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through November 30, 2024

RE: Whinstone Litigation

Total Professional Services	$ 804,262.50
Total Expenses Advanced	$ 378,889.12
TOTAL THIS INVOICE	**$ 1,183,151.62**
Previous Balance	$ 539,631.50
TOTAL BALANCE DUE	**$ 1,722,783.12**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Stris & Maher LLP

Invoice # 14317 December 19, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
11/01/24	VO	Correspond with team regarding trial witnesses.	.10	875.00	87.50
11/01/24	EB	Correspond with BA, JS, PB, LKC team, B. Howell, and Fulcrum regarding graphics set up at pretrial conference and preparation of trial graphics (0.9); review expert materials for updates and revisions to exhibit list (1.2); attend teleconference with BA, JS, and PB regarding same (1.0); advise PB, HM, ASA, and NC regarding review of Siddiqi deposition transcript for potential confidentiality designations (0.2).	3.30	1100.00	3,630.00
11/01/24	BA	Review confidentiality designations for Gibson and Brown depositions and correspond with HM and JS regarding same (0.8); review and revise draft reply memorandum in support of motion to assume (1.2); confer with EB, PB, and JS regarding trial exhibits and exhibit list (1.0); review and instruct Stris team regarding changes to trial exhibit list including review of potential exhibits and deposition transcripts (4.0); confer with JS regarding trial preparation and strategy (1.0).	8.00	1050.00	8,400.00
11/01/24	JS	Work on trial presentation planning (6.3); attend portion of teleconference with BA, EB, and PB regarding exhibit list (0.6); confer with BA regarding trial plan (1.0); confer with PB regarding trial witnesses preparation (1.0); confer with CS regarding trial brief (0.2); review and serve trial subpoena on C. Harris (0.3); review and evaluate assumption reply (0.5); review and revise B Gibson Daubert brief (0.5).	10.40	875.00	9,100.00
11/01/24	CS	Finalize and file motion to exclude expert testimony of Benjamin Gibson (0.5); continue drafting trial brief (9.2).	9.20	725.00	6,670.00
11/01/24	CHH	Review and analyze deposition transcripts and exhibits, and update trial exhibits list accordingly.	4.00	325.00	1,300.00
11/01/24	JH	Continue updating email exhibits as directed by PB and MV.	4.00	325.00	1,300.00
11/01/24	PB	Review and analyze reply brief regarding motion to assume (0.3); attend teleconference with EB, BA, and JS regarding revisions to exhibit list (1.0); continue preparing same (5.6); confer with JS regarding trial witness preparation (1.0).	7.90	725.00	5,727.50

Stris & Maher LLP

Invoice # 14317 December 19, 2024

Date	Tkpr	Description	Hours	Rate	Amount
11/01/24	ASA	Prepare sealed exhibit covers and material ahead of trial (2.4); gather relevant [redacted] SEC material at request of MV (0.7); highlighted proposed deposition designations to assist HM (3.0); create tables and finalize Debtors' Motion to Exclude Testimony of Whinstone's Expert Benjamin Gibson (1.9).	8.00	325.00	2,600.00
11/01/24	HM	Continue reviewing and analyzing Nathan Nichols deposition transcript for confidentiality designations and draft correspondence to opposing counsel (4.4); review and respond to team correspondence regarding post-deposition tasks (0.9); review, revise, and draft portion of Daubert motion for Whinstone safety expert Benjamin Gibson (3.1); finalize and serve confidentiality designation correspondence for Benjamin Gibson, David Schatz, and Kevin Haugen (0.2).	8.60	600.00	5,160.00
11/01/24	MV	Continue preparing trial exhibits, advising litigation fellows regarding supporting tasks, and revising exhibit list.	10.00	400.00	4,000.00
11/02/24	BA	Research and draft reply memorandum in support of motion to assume (6.7); confer with JS regarding same (0.3); correspond with PB regarding exhibit list (0.2).	7.20	1050.00	7,560.00
11/02/24	JS	Continue preparing opening (7.2); prepare direct exam of N. Nichols (4.0); review and evaluate assumption reply (0.7) and confer with BA (0.3) and W. Thompson and J. Cohn regarding same (0.8).	13.00	875.00	11,375.00
11/02/24	CS	Continue drafting trial brief.	4.00	725.00	2,900.00
11/02/24	CHH	Review and update trial exhibit list as directed by PB and MV.	4.30	325.00	1,397.50
11/02/24	PB	Continue preparing trial exhibit list (3.4); attend teleconferences with W. Thompson (0.5) and A. Swartz (0.3) regarding revisions to same.	4.20	725.00	3,045.00
11/02/24	HM	Finalize and serve confidentiality designations for the transcript of the deposition of Jeff McGonegal (0.1); review and analyze transcript of deposition of Alex Peloubet for confidentiality designations and draft correspondence to opposing counsel (3.2); begin reviewing and analyzing transcript of deposition of Tiffany Lewis for confidentiality designations (1.7).	5.00	600.00	3,000.00

Stris & Maher LLP

Invoice # 14317 December 19, 2024

Date	Tkpr	Description	Hours	Rate	Amount
11/02/24	MV	Continue preparing trial exhibits and revising exhibit list.	6.00	400.00	2,400.00
11/03/24	EB	Correspond with PB regarding exhibit list (0.1); review and respond to correspondence from BA and update clients regarding trial preparation and attendance (0.2).	.30	1100.00	330.00
11/03/24	BA	Continuing researching and revising reply memorandum in support of motion to assume and convey same to JS for review (0.7); review edits on reply memorandum from J. Cohn, implement same and further revise draft, correspond with HM regarding citations for same, and convey same to bankruptcy and litigation teams for review (1.9); review draft trial brief, correspond with JS regarding same, confer with CS regarding strategy for same, review research from [redacted] on contract positions as relevant to same, and research, draft, and revise same (2.9); correspond and confer with JS regarding reply brief in support of motion for summary judgment, analyze outline for same, and participate in teleconference with JS, CS, J. Cohn, and W. Thompson regarding strategy for same (1); ,correspond with bankruptcy team and with client team regarding trial preparation logistics (0.1); correspond with SD regarding assistance with summary judgment hearing preparation (0.1); review draft motion in limine and correspond with litigation team regarding same (0.3); review draft motion in limine regarding materials not disclosed by expert and correspond with litigation team regarding same (0.2).	7.20	1050.00	7,560.00
11/03/24	JS	Prepare outline of MSJ reply brief (1.3); review and revise MILs (1.5); confer with CS (0.3), BA (0.3), and BA, CS, J. Cohn, and W. Thompson (0.5) regarding MILs and MSJ reply; continue work on opening (2.7) and direct examination of N. Nichols (2.0) and confer with PB regarding same (1.0).	9.60	875.00	8,400.00
11/03/24	CS	Meet with JS, BA, J. Cohn, and W. Thompson to discuss substance of reply in support of motion for summary judgment (.4); meet with JS and BA to discuss trial brief (.3); continue drafting reply in support of motion for summary judgment (5.9).	6.60	725.00	4,785.00

Stris & Maher LLP

Invoice # 14317 December 19, 2024

Date	Tkpr	Description	Hours	Rate	Amount
11/03/24	PB	Prepare trial exhibit list (5.2); teleconference with MV regarding exhibit list (0.3); teleconference with JS regarding exhibit list and trial strategy (0.5); correspondence regarding same (0.4).	6.40	725.00	4,640.00
11/03/24	HM	Complete reviewing and analyzing Tiffany Lewis deposition transcript for confidentiality designations and draft correspondence to opposing counsel (0.8); review and analyze Alex Peloubet deposition transcript for confidentiality designations and draft correspondence to opposing counsel (1.2); begin reviewing and analyzing Brendan Cottrell deposition transcript for confidentiality designations (1.5); review and revise reply in support of motion to assume (1.5); finalize and serve confidentiality designations for deposition transcripts of Alex Peloubet, Tiffany Lewis, Shams Siddiqi, and Nathan Nichols (0.4).	5.40	600.00	3,240.00
11/03/24	MV	Continue gathering of trial exhibits, create Logikcull searches for Bates stamped versions of all documents including all family documents and Native files, create slipsheets for the same, continue revising internal exhibit list.	9.00	400.00	3,600.00
11/04/24	EB	Confer with BA, JS, ASA, and [redacted] regarding [redacted] and adjustments to same to facilitate [redacted] (0.6); assist BA, PB, and MV with updates to exhibit list and confidentiality designations (0.7).	1.30	1100.00	1,430.00
11/04/24	BA	Research, draft, and revise trial brief (6.4); confer with JS regarding trial strategy (0.2); correspond with PB and EB regarding issues with exhibit list, including potential sealing, and review draft of same (0.8); correspond with Quinn team, with JS and EB, and with litigation team, regarding trial preparation logistics (0.6); review draft motions in limine and correspond with HM, A. Swartz, and JS regarding finalization and filing of same (1); correspond with P. Tomasco regarding M. Robinson testimony and potential exhibits (0.1)	9.10	1050.00	9,555.00
11/04/24	JS	Continue preparing for pretrial conference and trial.	10.10	875.00	8,837.50

Stris & Maher LLP

Invoice # 14317 December 19, 2024

Date	Tkpr	Description	Hours	Rate	Amount
11/04/24	CS	Review and revise reply in support of motion to assume (3.1); draft Asay declaration in support of reply in support of motion to assume (0.4); finalize and file reply in support of motion to assume (0.5); continue drafting reply in support of motion for summary judgment (6.6).	10.60	725.00	7,685.00
11/04/24	CHH	Prepare and finalize trial exhibits and trial exhibit list.	10.00	325.00	3,250.00
11/04/24	JH	Update internal bankruptcy docket [redacted] (0.5); coordinate with Stris team, Lehotsky Keller Cohn co-counsel, and Quinn Emmanuel Bankruptcy counsel regarding Houston travel logistics (no charge - 2.5); cite-check Debtors' Reply in Support of Debtors' Motion to Assume at CS request (3.0).	3.50	325.00	1,137.50
11/04/24	PB	Prepare trial exhibit list and supporting documents.	10.00	725.00	7,250.00
11/04/24	ASA	Attention to Houston trial logistics in light of bifurcation of trial (1.0); assist CHH, JHA, and MV with trial exhibit list preparation by collecting and recording information about relevant documents (4.2).	5.20	325.00	1,690.00
11/04/24	HM	Revise, finalize, and file motions in limine (5.3); continue performing discovery tasks related to protective order (2.2); review and respond to team correspondence regarding motions and trial preparation (0.7); review and revise reply in support of motion to assume (1.6).	9.80	600.00	5,880.00
11/04/24	SD	Start making binders of both parties' Partial Motions for Summary Judgment, exhibits, and replies (3.7).	3.70	325.00	1,202.50
11/04/24	MV	Continue gathering of trial exhibits, create [redacted] for Bates stamped versions of all documents including all family documents and Native files, create slip sheets for the same, continue revising internal exhibit list.	7.00	400.00	2,800.00
11/05/24	EB	Review and respond to Stris and LKC team correspondence regarding action items including finalization of exhibit list and exhibits and trial preparation (0.5); attend teleconference with PB regarding expert witness trial preparation (0.3).	.80	1100.00	880.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/05/24	BA	Participate in teleconference with Fulcrum representative, JS, PB, and HM to discuss graphics preparation (0.4); confer with PB regarding trial preparation and witness scripts (0.3); participate in teleconference with client team, litigation counsel, and bankruptcy counsel to discuss trial preparation and other priority action items (0.9); research, draft, and revise trial brief (6.6); review and revise reply brief in support of summary judgment motion, review proposed edits from J. Cohn, and correspond with CS and JS regarding edits to same (0.8);	9.00	1050.00	9,450.00
11/05/24	JS	Continue preparing for final pretrial conference and trial.	9.00	875.00	7,875.00
11/05/24	SB	Review trial exhibit list and identify documents that are meant to be filed under seal (1.1); create cover sheets for exhibits that are being filed under seal (2.3); create sharefile link to send the same to legal assistant CHH (0.2).	3.60	325.00	1,170.00
11/05/24	CS	Draft [redacted] in support of reply in support of motion for partial summary judgment (.2); continue drafting reply in support of motion for partial summary judgment (2.9); revise reply in support of motion for partial summary judgment in light of suggested edits (2.1); review and revise trial brief (2.9)	8.10	725.00	5,872.50
11/05/24	CHH	Prepare and finalize trial exhibits and trial exhibit list.	6.50	325.00	2,112.50
11/05/24	PB	Prepare trial exhibit list (2.2); teleconference with BA and JS regarding exhibit list (0.3); teleconference with EB regarding expert trial preparation (0.3); prepare cross-examination of J. Matthews (2.2); teleconference with C. Hickey (Fulcrum) and JS, BA, and HM regarding trial graphics (0.5); teleconference with BA regarding Matthews cross (0.5); call with K. Pritchard regarding T. Lewis testimony (0.3).	6.30	725.00	4,567.50
11/05/24	ASA	Update master contact list to ensure ease of communication among team members and external contacts (0.4); update [redacted] memorandum and tend to file organization to reflect recent case activity (1.9); correspond with Houston hotel to make alterations to booking (no charge - 0.5); further assist with trial preparatory tasks in advance of pre-trial hearing and trial (3.1).	5.40	325.00	1,755.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/05/24	HM	Continue performing post-deposition tasks under the protective order (3.3); review and organize deposition transcripts and videos (4.2); review and revise trial brief (1.0); attend meeting with Fulcrum Legal, BA, JS, and PB to discuss trial preparation (0.4).	8.90	600.00	5,340.00
11/05/24	SD	Continue to prepare binders for the upcoming trial in U.S. Bankruptcy Court of the Southern District of Texas (1.0).	1.00	325.00	325.00
11/05/24	MV	Continue finalizing trial exhibits, correspondence with PB and CH regarding the same (1.0); create copies of all Native sealed and unsealed trial exhibits for service (0.5); review final exhibit list and cross check omitted exhibits and official descriptions with internal list, update the same in preparation for trial (3.5).	5.00	400.00	2,000.00
11/06/24	EB	Advise ASA regarding high priority hearing and trial preparation action items (0.1); continue assisting with trial preparation (1.0).	1.10	1100.00	1,210.00
11/06/24	BA	Research, review, and revise trial brief (4.5); prepare for summary judgment argument (3); confer with JS, W. Thompson, and J. Cohn regarding strategy for and edits to reply brief in support of summary judgment and argument regarding same, and correspond with CS regarding same (0.5); correspond with [redacted] regarding declaration for reply brief, with [redacted] regarding reply brief filing, and with litigation and bankruptcy team regarding motions in limine (0.2).	8.20	1050.00	8,610.00
11/06/24	JS	Continue preparing for final pretrial conference and trial.	12.20	875.00	10,675.00
11/06/24	CS	Revise reply in support of motion for partial summary judgment (5.2); finalize declaration of Bridget Asay and exhibits in support of reply brief (0.6); review and revise trial brief (2.2).	8.00	725.00	5,800.00
11/06/24	JH	Cite-check reply brief in support of Debtors' motion for partial summary judgment at CS request (5.0).	5.00	325.00	1,625.00
11/06/24	PB	Prepare Matthews cross-examination outline (1.4); prepare direct examination outline for A. Peloubet (5.5); revise trial exhibit list and correspondence regarding same (3.8).	10.70	725.00	7,757.50

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Date	Tkpr	Description	Hours	Rate	Amount
11/06/24	ASA	Update [redacted] memorandum to reflect recent case activity (1.0); gather deposition transcripts for trial preparation (0.6); circulate contact information amongst trial team (0.1); review trial exhibits and master exhibit list to ensure proper preparation of material (2.5); attention to trial and travel logistics on behalf of attorneys and support staff (no charge - 0.8).	4.20	325.00	1,365.00
11/06/24	HM	Review and revise trial brief (7.1); review and respond to team correspondence regarding trial preparation (0.3).	7.40	600.00	4,440.00
11/06/24	SD	Finalize Rhodium binders for upcoming Bankruptcy Court trial (1.9).	1.90	325.00	617.50
11/06/24	MV	Review additional documents added to exhibits by attorneys, save originals for internal records, update internal exhibit list regarding the same (2.0); review local rules and judge standing order regarding pre-trial conference and documents required, correspondence with PB regarding the same (0.5); continue review of internal exhibit list and cross reference official list for updated sealing designations, update the same (2.0); add missing information in preparation for trial (3.0)	6.50	400.00	2,600.00
11/07/24	EB	Continue assisting with summary judgment hearing and trial preparation.	.60	1100.00	660.00
11/07/24	BA	Prepare for summary judgment hearing and for trial (6.8).	6.80	1050.00	7,140.00
11/07/24	JS	Prepare for final pre-trial conference.	11.50	875.00	10,062.50
11/07/24	SR	Begin reviewing and analyzing file and deposition transcript in connection with drafting trial cross outline for B. Cottrell.	2.70	650.00	1,755.00
11/07/24	SB	Assist JS with trial preparation by reviewing Whinstone's exhibit list and identifying witness designations (1.4); cite check trial brief for CS (3.7).	5.10	325.00	1,657.50
11/07/24	CS	Revise trial brief (8.6); draft [redacted] declaration in support of trial brief (0.4); collect and finalize exhibits in support of trial brief (0.6); finalized and file trial brief (.3).	9.90	725.00	7,177.50
11/07/24	CHH	Prepare materials for pre-trial conference.	6.00	325.00	1,950.00
11/07/24	JH	Assist in preparation for pre-trial conference.	3.00	325.00	975.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/07/24	PB	Prepare trial exhibit list (0.7); prepare direct examination outline for A. Peloubet (4.5); prepare cross outline regarding B. Gibson (2.3); review and analyze draft trial brief (0.6); teleconference with EB regarding trial strategy (0.2).	8.30	725.00	6,017.50
11/07/24	ASA	Gather documents at request of JS and initiate creation of binders for Motions for Summary Judgment and Motion to Exclude Whinstone's expert Benjamin Gibson.	2.00	325.00	650.00
11/07/24	HM	Assist with pretrial hearing preparation tasks (2.0); discuss trial preparation with PB and W. Thompson (1.1); review and respond to team correspondence regarding trial preparation (1.2).	4.30	600.00	2,580.00
11/07/24	MV	Review Rhodium court endorsed trial exhibits and cross reference all electronic court numbering on internal list for both sealed and unsealed versions, update internal exhibit list, correspondence regarding the same.	8.00	400.00	3,200.00
11/08/24	VO	Confer with BA and JS regarding preparation for hearing on motions for summary judgment and motions in limine (0.5); meet with client, P. Tomasco, and litigation teams in preparation for pretrial conference (2.5); attend pretrial conference and motions hearing (3.0); debrief with team and plan regarding next steps (1.7).	7.70	875.00	6,737.50
11/08/24	EB	Continue assisting with trial preparation (1.0); review team correspondence regarding hearing and resulting action items (0.1).	1.10	1100.00	1,210.00
11/08/24	BA	Prepare for, attend and participate in status conference and pretrial motions hearing, and confer with litigation team, bankruptcy team, and client representatives (10.5); prepare for trial, including review of proposed deposition designations from Whinstone (2.5).	13.00	1050.00	13,650.00
11/08/24	JS	Prepare for and attend final pretrial conference (6.5); prepare for first day of trial (7.8).	14.30	875.00	12,512.50
11/08/24	SR	Continue drafting B. Cottrell cross outline.	5.60	650.00	3,640.00
11/08/24	CHH	Assist in preparations for pre-trial hearing (4.5); attend pre-trial hearing (3.5); assist JS with preparations of opening slides for trial (1.0).	9.00	325.00	2,925.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/08/24	JH	Collect all Whinstone and Rhodium exhibits internally for attorney reference (2.0); attend pre-trial conference with BA, JS, VO, PB, HM, ASA, CHH, Lehotsky Keller Cohn co-counsel (W. Thompson), and clients (M. Soule, C. Topping, C. Blackmon, N. Nichols) (3.0); attend de-brief with litigation team to discuss [redacted] (1.0); prepare transcript of opposing counsel M. Thomas' hearing testimony regarding notices of breach and May 2022 termination letter for BA (2.5).	8.50	325.00	2,762.50
11/08/24	PB	Prepare cross examination outline regarding B. Gibson (0.8); prepare for final pre-trial conference (4.5); attend final pre-trial conference (3.5); follow-up team meeting regarding trial strategy (1.5); case strategy discussion with BA, JS, and W. Thompson (1.0); review deposition designations for A. Peloubet (1.2); meeting with JS regarding opening slides (2.6); review depositions (1.0).	16.10	725.00	11,672.50
11/08/24	ASA	Assist with final preparations for pre-trial hearing (4.0); highlight Whinstone's designations of relevant deposition testimony (2.0); attend pre-trial hearing (3.5); assist with collection of documents relevant to B. Cottrell witness preparation (1.3).	10.80	325.00	3,510.00
11/08/24	HM	Attend pretrial conference (3.5); prepare for pretrial conference including working with hot seat operator to prepare exhibits (3.7); attend meeting with client and Stris, Lehotsky, and Quinn litigation teams to discuss pretrial conference and trial strategy (2.0).	9.20	600.00	5,520.00
11/08/24	MV	Download Whinstone court endorsed exhibits, document the same on internal list with referenced electronic court filed numbering, add descriptions of exhibits, send the same to vendor in preparation for trial (7.0); make copies of all exhibits for internal records (0.5).	7.50	400.00	3,000.00
11/09/24	VO	Draft direct script for B. Cottrell examination (2.6); review and revise [redacted] for B. Cottrell trial preparation (0.5); attend trial preparation session with B. Cottrell (5.2).	8.30	875.00	7,262.50
11/09/24	BA	Trial preparation, including drafting and review of scripts, exhibits, exhibit objections, and strategy assessments and planning.	12.00	1050.00	12,600.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/09/24	JS	Prepare for first day of trial.	12.00	875.00	10,500.00
11/09/24	CHH	Assist JS with [redacted] (witness) direct examination preparations (3.0); assist VO with [redacted] (witness) cross examination preparations (5.0); legal research for BA on various evidentiary issues in preparation for trial (3.0); assist with various other trial preparations (1.5).	12.50	325.00	4,062.50
11/09/24	JH	Begin comparing B. Cottrell deposition and Temporary Injunction hearing transcripts to [redacted] (5.0); perform other administrative tasks as needed (3.0).	8.00	325.00	2,600.00
11/09/24	PB	Preparation for trial on motion to assume.	16.10	725.00	11,672.50
11/09/24	ASA	Assist PB and B. Wiggins of Fulcrum Legal Graphics with preparation of slides for use during trial, including review of deposition of Whinstone N. Burnett (2.0); download and share deposition video of N. Nichols with client (0.5); conduct legal research alongside CHH on various issues specified by BA in preparation for trial (3.3); assist with other iterative trial preparations (2.5).	8.30	325.00	2,697.50
11/09/24	HM	Draft and revise responses to Whinstone's objections to evidence in Rhodium's summary judgment briefs (7.0); assist with pretrial tasks, including reviewing and revising opening argument slide deck and discussing trial strategy with BA, JS, PB, and W. Thompson (1.3); draft and revise direct examination outline of Dr. Eric Brown (1.5).	9.80	600.00	5,880.00
11/09/24	MV	Review Native files pertaining to trial exhibits and previously sent to the judge's clerk, discuss the same with attorney PB, determine missing Native files and create zip/correspondence for judge's courtesy copies.	1.00	400.00	400.00
11/10/24	VO	Participate in portions of multiple Rhodium witness preparation sessions (4.0); participate in trial preparation (4.1).	8.10	875.00	7,087.50
11/10/24	BA	Trial preparation, including exhibit review, script preparation, witness preparation, and strategy assessment.	12.90	1050.00	13,545.00
11/10/24	JS	Prepare for first day of trial.	10.30	875.00	9,012.50

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Date	Tkpr	Description	Hours	Rate	Amount
11/10/24	CHH	Assist attorneys with preparation for direct and cross-examination including preparation of witness binders and coordination with B. Wiggins (Fulcrum) regarding document displays for witness examinations.	9.70	325.00	3,152.50
11/10/24	JH	Assist with pretrial support including identifying trial exhibits for attorneys (3.2); prepare memorandum identifying [redacted] between [redacted] at VO request (4.8).	8.00	325.00	2,600.00
11/10/24	PB	Preparation for trial on motion to assume.	16.90	725.00	12,252.50
11/10/24	ASA	Assist attorneys and CHH with review of past witness testimony, counter-designations, and exhibit binder preparation for use during examination of witnesses (3.6); continue legal research for HM in support of objections (1.6); assist with additional pretrial action items in support of attorney team (2.9).	8.10	325.00	2,632.50
11/10/24	HM	Prepare and revise responses to Whinstone's evidentiary objections to Rhodium's summary judgment briefs (3.4); continue assisting with trial preparation including of witnesses for direct examination and opening presentation (5.9).	9.30	600.00	5,580.00
11/11/24	VO	Conduct further witness preparation with [redacted] (1.2); meetings with team in preparation for trial (1.6).	2.80	875.00	2,450.00
11/11/24	BA	Trial preparation, including witness scripts, cross preparation, witness preparation, exhibit review, and strategy analysis.	13.20	1050.00	13,860.00
11/11/24	JS	Prepare for first day of trial.	16.30	875.00	14,262.50

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Date	Tkpr	Description	Hours	Rate	Amount
11/11/24	CHH	Assist A. Swartz (LKC) with N. Miljkovic (witness) cross examination preparations (1.0); assist W. Thompson (LKC) with C. Harris (witness) cross examination preparations (1.0); assist JS with [redacted] (witness) direct examination preparations (1.0); review and finalize witness binders for N. Nichols, C. Harris, D. Schatz, and N. Miljkovic (witnesses) (1.5); review and analyze Whinstone and Debtors' objections to exhibit lists to create exhibit admission tracker and final, [redacted] exhibit lists for use at trial (4.0); emails and telephone calls with L. Garcia (printing service contact) regarding preparation of witness binders and exhibit lists (0.3); emails with B. Wiggins (Fulcrum) regarding document displays with witness examinations (0.2).	9.00	325.00	2,925.00
11/11/24	JH	Continue assisting with trial support including preparation of exhibit tracking spreadsheet and other tasks as directed by attorneys.	8.00	325.00	2,600.00
11/11/24	PB	Preparation for trial on motion to assume.	17.30	725.00	12,542.50
11/11/24	ASA	Assist attorneys with administrative tasks and preparation for trial incuding preparing examination binders and responding to iterative requests alongside CHH and JHA regarding organization and compliation of documents for use during trial.	7.70	325.00	2,502.50
11/11/24	HM	Perform trial preparation tasks, including reviewing and revising opening statement presentation, conferring with litigation team regarding trial and exhibit logistics, and revising Dr. Eric Brown direct examination outline.	6.30	600.00	3,780.00
11/12/24	VO	Attend trial.	8.00	875.00	7,000.00
11/12/24	BA	Trial preparation and trial attendance.	14.00	1050.00	14,700.00
11/12/24	JS	Prepare for and attend trial.	15.50	875.00	13,562.50

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Date	Tkpr	Description	Hours	Rate	Amount
11/12/24	CHH	Assist with filing of amended exhibit and amended exhibit list (0.3); assist W. Thompson (LKC) with J. McGonegal (witness) cross examination preparations (1.0); assist W. Thompson (LKC) with N. Burnett (witness) cross examination preparations (0.5); emails and telephone calls with L. Garcia (printing service contact) regarding preparation of witness binders (0.2); attend portions of trial day one and assist attorneys with admitted exhibits tracking (5.0); continue assisting with various other trial preparations (3.5); prepare list of Debtors' and Whinstone's admitted exhibits and copies of same for attorney review (1.0).	11.50	325.00	3,737.50
11/12/24	JH	Attend trial while marking admitted exhibits and fulfilling various other attorney requests as needed.	8.00	325.00	2,600.00
11/12/24	PB	Attend trial and preparation for same.	16.50	725.00	11,962.50
11/12/24	ASA	Attend court proceedings and actively support attorneys during trial [redacted] (8.0); assist PB and BA with finalization of witness examination binders [redacted] (3.0).	11.00	325.00	3,575.00
11/12/24	HM	Continue preparing for and assisting with trial day 1, including tracking admitted exhibits and conducting document research (9.0); assist with preparations for trial day 2 (0.3).	9.30	600.00	5,580.00
11/12/24	MV	Continue updating exhibit list information to ensure completeness, accuracy with respect to Phase 1, and preparation for Phase 2 trial.	5.00	400.00	2,000.00
11/13/24	VO	Attend trial.	8.00	875.00	7,000.00
11/13/24	EB	Remotely attend and continue assisting with portions of trial day 2.	1.00	1100.00	1,100.00
11/13/24	BA	Trial preparation and attendance at trial.	13.90	1050.00	14,595.00
11/13/24	JS	Prepare for and attend trial.	11.90	875.00	10,412.50
11/13/24	CHH	Prepare for trial day two (2.5); attend trial day two and assist attorneys with admitted exhibits (9.0); review and analyze Court's minute entry and prepare list of admitted exhibits and copies of same for attorney review (1.0).	12.50	325.00	4,062.50

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Date	Tkpr	Description	Hours	Rate	Amount
11/13/24	JH	Attend trial while marking admitted exhibits and fulfilling various other attorney requests as needed.	8.00	325.00	2,600.00
11/13/24	PB	Attend trial and preparation for same.	15.30	725.00	11,092.50
11/13/24	ASA	Make adjustments to final binder for use by BA in cross of J. Matthews (0.8); attend portion of court proceedings and support attorneys when requests for documents arise (9.2).	10.00	325.00	3,250.00
11/13/24	HM	Continue preparing for and assisting with trial day 2, including tracking admitted exhibits and conducting document research (9.0); assist with preparations for trial day 3 and 4, including drafting evidentiary chart for closing argument and conducting research on [redacted] (3.2).	12.20	600.00	7,320.00
11/13/24	MV	Continue updating exhibit list information to ensure completeness, accuracy with respect to Phase 1, and preparation for Phase 2 trial.	5.00	400.00	2,000.00
11/14/24	VO	Attend trial.	8.00	875.00	7,000.00
11/14/24	EB	Remotely attend portions of trial.	1.50	1100.00	1,650.00
11/14/24	BA	Trial preparation and attendance at trial.	14.30	1050.00	15,015.00
11/14/24	JS	Prepare for and attend trial.	16.40	875.00	14,350.00
11/14/24	CHH	Prepare for trial day three (2.5); observe and assist with trial day three (9.0).	11.50	325.00	3,737.50
11/14/24	JH	Attend trial while marking admitted exhibits and fulfilling various other attorney requests as needed.	8.00	325.00	2,600.00
11/14/24	PB	Attend trial and prepare for final day of trial.	18.20	725.00	13,195.00
11/14/24	ASA	Prepare for trial day three by tending to attorney requests (2.5); observe and assist with trial day three (9.0); assist attorneys after trial day three (1.5).	13.00	325.00	4,225.00
11/14/24	HM	Continue preparing for and assisting with trial day 3, including tracking admitted exhibits and conducting document research (9.5); assist with preparations for trial day 2, including conducting witness preparation with [redacted] and drafting correspondence to opposing counsel (1.5).	11.00	600.00	6,600.00
11/15/24	VO	Attend trial.	6.00	875.00	5,250.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/15/24	EB	Remotely attend portions of trial (2.5); update C. Griffey on status (0.1).	2.60	1100.00	2,860.00
11/15/24	BA	Trial preparation and attendance at trial.	8.40	1050.00	8,820.00
11/15/24	JS	Prepare for and attend final day of trial.	8.70	875.00	7,612.50
11/15/24	CHH	Prepare for trial day four (0.5); attend and assist with trial day four (8.0).	8.50	325.00	2,762.50
11/15/24	JH	Attend trial while marking admitted exhibits and fulfilling various other attorney requests as needed.	8.00	325.00	2,600.00
11/15/24	PB	Attend final day of trial.	9.20	725.00	6,670.00
11/15/24	ASA	Prepare for trial day four (0.7); attend court proceedings of trial day four (8.0); assist attorneys with related documents and files (2.3).	11.00	325.00	3,575.00
11/15/24	HM	Continue preparing for and assisting with trial day 4, including tracking admitted exhibits, conducting document research, and participating in strategy discussions (7.5); debrief with litigation teams (0.5).	8.00	600.00	4,800.00
11/15/24	MV	Review internal exhibit list for universe of documents and segregate Phase 2 trial documents, create [redacted] for missing information related to document Bates numbers, in preparation for trial Phase 2 [redacted].	6.00	400.00	2,400.00
11/16/24	EB	Attention to post-trial action items.	.20	1100.00	220.00
11/17/24	VO	Confer with JS regarding [redacted] (0.1); review same (0.2); prepare for (0.2) and confer with client representatives regarding same (0.7); correspondence with JS and PS regarding same (0.6); confer with P. Tomasco regarding same (0.3); emails with team and client representatives regarding [redacted] (0.3).	2.40	875.00	2,100.00
11/17/24	EB	Review and respond to team correspondence regarding [redacted] and analysis (0.2); attention to post-trial action items (0.1).	.30	1100.00	330.00
11/17/24	BA	Collect [redacted] from experts and convey same to VO.	.30	1050.00	315.00
11/18/24	VO	Attend client meeting.	2.00	875.00	1,750.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/18/24	EB	Correspond with BA and JS regarding damages experts and potential supplementation (0.1); advise HM regarding post-trial case management-related action items (0.1).	.20	1100.00	220.00
11/18/24	BA	Confer with JS and correspond with EB regarding follow up with C. Griffey regarding [redacted]; correspond with litigation team regarding [redacted] damages.	.30	1050.00	315.00
11/18/24	ASA	Attention to payment of invoice for transcript request (0.1); organize trial material and update matter memorandum at request of HM (0.8).	.90	325.00	292.50
11/18/24	MV	Continue review of internal exhibit list for universe of documents and Phase 2 trial, determine missing information and update list with document identification and Bates numbers, complete all fields in preparation for possible Phase 2 trial.	2.00	400.00	800.00
11/19/24	EB	Confer with BA regarding ERCOT expert analysis (0.2); review and respond to team correspondence regarding same and post-trial action items (0.2).	.40	1100.00	440.00
11/19/24	BA	Participate in portion of client call with JS, W. Thompson, J. Cohn, and P. Tomasco (0.8); confer with EB regarding C. Griffey opinion and [redacted] (0.2); correspond with C. Griffey regarding meeting and with W. Thompson regarding updated closing slides (0.1).	1.10	1050.00	1,155.00
11/19/24	JS	Evaluate potential phase 2 issues (0.9) and prepare for and attend touch point call (1.3).	2.20	875.00	1,925.00
11/19/24	HM	Review and analyze documents for confidentiality designations (0.8).	.80	600.00	480.00
11/20/24	EB	Review update from and correspond with HM regarding compilation and provision of unredacted information to C. Griffey.	.20	1100.00	220.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/20/24	BA	Review Siddiqi and Griffey expert reports as relevant to potential phase 2 and [redacted] (0.5); participate in meeting with expert C. Griffey, BA, and SD to discuss issues raised in rebuttal report as well as [redacted] in phase 2 of the trial (0.4); attend debrief meeting with JS and SD following meeting with expert C. Griffey (0.2); correspond with HM, EB, and JS to provide direction for HM to collect and review unredacted data as needed for C. Griffey (0.3); correspond with HM and with W. Thompson on follow up matters from trial to ensure litigation files are complete (0.2); confer with JS and correspond with JS and litigation team regarding response to opposing counsel and phase 2 timing (0.2).	1.80	1050.00	1,890.00
11/20/24	JS	Prepare for and attend damages call with Stris and LKC teams (1.5); prepare for and attend call with C. Griffey and Stris team regarding phase 2 issues (0.9); prepare for and attend call with [redacted] regarding [redacted] (0.9); prepare for and attend group calls regarding damages issues (1.6).	4.90	875.00	4,287.50
11/20/24	CHH	Prepare and finalize materials to share with expert C. Griffey.	.20	325.00	65.00
11/20/24	HM	Review and analyze documents to send to C. Griffey for trial phase 2 (3.0); continue assisting with post-trial phase 1 tasks, including qc of exhibit docketing and internal file updates (1.5).	4.50	600.00	2,700.00
11/20/24	SD	Participate in meeting with expert C. Griffey, BA, and JS to discuss issues raised in rebuttal report as well as potential expert involvement in phase 2 of the trial (0.4); attend debrief meeting with BA and JS following meeting with expert C. Griffey (0.2).	.60	325.00	195.00
11/21/24	VO	Confer with [redacted] regarding strategic action items.	.70	875.00	612.50
11/21/24	SD	Attend and prepare notes regarding 11/20/24 meeting with expert C. Griffey.	1.10	325.00	357.50
11/22/24	BA	Correspond with J. Cohn and litigation team regarding phase two timing, and correspond with C. Griffey to convey additional data and [redacted] and to confirm [redacted] (0.3).	.30	1050.00	315.00

Stris & Maher LLP

Invoice # 14317 December 19, 2024

Date	Tkpr	Description	Hours	Rate	Amount
11/25/24	BA	Prepare for (0.3) and participate in (0.5) teleconference with C. Griffey and HM to discuss status of [redacted] based on unredacted data; confer with EB regarding potential next steps for same (0.2).	1.00	1050.00	1,050.00
11/25/24	HM	Confer with BA and C. Griffey about [redacted] for phase 2 (0.5); review and analyze documents for C. Griffey (1.5).	2.00	600.00	1,200.00
11/26/24	VO	Attend status conference; emails with team regarding next steps regarding outcome of same.	.50	875.00	437.50
11/26/24	EB	Attend portion of debrief from ruling announcement (0.2); attention to resulting action items including expert updates (0.1).	.30	1100.00	330.00
11/26/24	BA	Attend portion of remote status conference regarding motion to assume (0.3); confer with JS, W. Thompson, and J. Cohn regarding next steps (0.3); confer with litigation and bankruptcy team regarding case strategy and phase 2 (0.5); attend client call with bankruptcy and litigation counsel (0.5); correspond with PB and JS regarding court's preliminary ruling, prepare talking points for [redacted], and correspond with C. Griffey regarding preliminary ruling and anticipated schedule (0.4); correspond and confer with EB regarding preliminary ruling and likely next steps (0.1); correspond with JS and EB regarding [redacted] by C. Griffey and information needed to support same (0.3).	2.40	1050.00	2,520.00
11/26/24	JS	Prepare for and attend status conference on ruling (0.6); attend debrief calls with Stris, LKC, and Rhodium teams (2.5); evaluate next steps in light of partial ruling on assumption motion (1.3).	4.40	875.00	3,850.00
11/26/24	CHH	Attend hearing regarding motion to assume contracts and debrief with trial team (0.8); review and update matter docket (0.3).	1.10	325.00	357.50
11/26/24	PB	Prepare for and attend hearing on motion to assume contracts.	.50	725.00	362.50

Invoice # 14317 December 19, 2024

Date	Tkpr	Description	Hours	Rate	Amount
11/26/24	HM	Attend status conference before Judge Alfredo Perez (0.5); confer with Stris, Lehotsky, and Quinn litigation teams to discuss status conference and upcoming tasks (0.4); attention to organization of internal files and memoranda (0.6).	1.50	600.00	900.00
		TOTAL PROFESSIONAL SERVICES			**$ 804,262.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	15.20	1,100.00	16,720.00
Bridget Asay	BA	Partner	164.40	1,050.00	172,620.00
Victor O'Connell	VO	Partner	62.60	875.00	54,775.00
John Stokes	JS	Partner	192.70	875.00	168,612.50
Colleen Smith	CS	Associate	56.40	725.00	40,890.00
Peter Brody	PB	Associate	179.90	725.00	130,427.50
Sarah Rahimi	SR	Associate	8.30	650.00	5,395.00
Helen Marsh	HM	Associate	133.30	600.00	79,980.00
Monica Viramontes	MV	Sr Paralegal	78.00	400.00	31,200.00
Andrew Atsalis	ASA	Fellow	105.60	325.00	34,320.00
Cynthia Huang	CHH	Fellow	116.30	325.00	37,797.50
Sebastian Delgado	SD	Fellow	8.30	325.00	2,697.50
Shayra Banta	SB	Fellow	8.70	325.00	2,827.50
Jaida Hodge-Adams	JH	Fellow	80.00	325.00	26,000.00
Total			**1,209.70**		**$ 804,262.50**

Invoice # 14317 December 19, 2024

EXPENSES ADVANCED

Date	Task	Description	Amount
10/15/24		EB airfare from Tallahassee to Houston round trip for depositions.	808.00
10/16/24		PB airfare from LAX to Dallas for depositions.	338.95
10/17/24		JS Airfare from SD - Houston - SD for depositions.	839.97
10/17/24		EB airport parking while in Texas for depositions.	39.00
10/17/24		VO lodging in Austin for depositions.	426.42
10/17/24		VO airfare from Los Angeles to Dallas	563.98
10/17/24		VO airfare from Austin to LAX from depositions.	420.98
10/18/24		SR airfare from Los Angeles to Austin for depositions.	429.97
10/18/24		SR airfare from Austin to Los Angeles for depositions.	420.98
10/21/24		BA airfare from Washington DC to Vermont for depositions.	783.97
10/21/24		VO lodging in Houston for depositions.	972.85
10/21/24		CH airfare from Las Vegas to Houston for trial.	311.98
10/21/24		VO airfare from Dallas to Houston for depositions.	299.98
10/21/24		CH airfare from Houston to Las Vegas for trial.	128.97
10/22/24		BA airfare from Vermont to Houston for depositions	723.98
10/22/24		SR airfare from Los Angeles to Austin for depositions.	106.01
10/23/24		JH roundtrip airfare for travel to Houston for trial.	314.01
10/24/24		VO transporation in Texas for depositions.	43.65
10/24/24		VO transporation in Texas for depositions.	70.20
10/24/24		PB airfare from Los Angeles to Houston for depositions.	477.98
10/24/24		PB airfare from Houston to Dallas for depositions.	224.98
10/25/24		VO transporation in Texas for depositions.	189.53
10/25/24		VO transporation in Texas for depositions.	34.99
10/25/24		VO transporation in Texas for depositions.	31.11
10/25/24		PB airfare from Dallas to Los Angeles for depositions.	480.48
10/25/24		PB lodging in Houston for depositions.	583.31
10/26/24		JS airport parking while in Texas for depositions.	73.00
10/26/24		EB transporation in Texas for depositions.	59.70
10/26/24		VO lodging in Dallas for depositions.	1,401.60
10/26/24		VO transporation in Texas for depositions.	87.50

Stris & Maher LLP

Invoice # 14317 December 19, 2024

Date	Task	Description	Amount
10/26/24		PB lodging in Dallas for depositions.	483.63
10/27/24		EB transporation in Texas for depositions.	37.18
10/28/24		BA transporation in Texas for depositions.	81.30
10/28/24		JS transporation in Texas for depositions.	35.65
10/28/24		JS hotel in Texas for depostions.	380.53
10/28/24		VO hotel for deposition prep in Houston.	147.89
10/29/24		EB transportation in Texas for depositions.	102.33
10/29/24		BA hotel for Houston depositions.	767.14
10/29/24		VO hotel in Houston for depositions.	145.89
10/29/24		VO parking for depostions in Houston.	34.65
10/29/24		Vendor fee for deposition of B. Gibson.	3,525.80
10/29/24		Vendor fee for videography services for deposition of Tiffany Lewis.	699.00
10/29/24		Transcript with Index of Eric N Brown.	2,781.35
10/29/24		Vendor fee for videography services for the deposition of Eric N Brown.	689.00
10/30/24		EB hotel in Texas for depostions.	1,394.54
10/30/24		BA transporation for depostions and trial.	270.02
10/30/24		VO hotel in Austin for depositions.	458.63
10/30/24		VO airfare from Austin to Santa Ana.	99.00
10/30/24		VO parking for depositions in Houston.	13.99
10/30/24		VO car rental for depositions in Houston and Austin.	598.43
10/30/24		BA airfare from HOU to DAL for deposition.	249.98
10/31/24		BA airfare to Houston for depositions.	364.48
10/31/24		BA airport parking for depositions.	48.00
11/01/24		BA hotel in Dallas for depositions.	1,275.64
11/01/24		Logikcull - EDiscovery (November 2024).	2,646.00
11/01/24		Vendor fee for deposition of S. Siddiqi.	2,576.55
11/01/24		Charles S Griffey - October 2024 services.	72,600.00
11/01/24		Vendor fee for expedited transcripts with index of Tiffany Lewis.	2,597.90
11/02/24		BA airfare to Houston for trial.	1,086.36
11/03/24		JS airfare from Houston to SD from trial.	461.99
11/04/24		JS airfare from SD to Houston for trial.	498.47
11/05/24		Fulcrum additional retainer.	18,000.00
11/06/24		PB flight from LAX to HOU for trial.	542.46

Stris & Maher LLP

Invoice # 14317 December 19, 2024

Date	Task	Description	Amount
11/06/24		The Lancaster Hotel room block for trial.	131,734.24
11/06/24		Vendor fee for deposition cancellation of R. Peters.	500.00
11/07/24		BA airfare to VT from Houston for trial.	647.97
11/07/24		VO airfare from LB to HOU for trial.	583.98
11/07/24		AA airfare from BOS to HOU for trial.	398.98
11/08/24		JS transportation in Texas for trial.	324.57
11/08/24		VO transportation in Houston for trial.	277.66
11/08/24		CH airfare from HOU to LAS.	100.01
11/08/24		Vendor fee for expedited transcritp with index of Brendan Cottrell.	2,960.90
11/08/24		Vendor fee for expedited transcript with index of Nathan Nichols.	4,664.35
11/08/24		Vendor fee for videography services for the deposition of Brendan Cottrell.	749.00
11/08/24		Vendor fee for videography services for the deposition of Nathan Nichols.	1,449.00
11/11/24		PB flight from HOU to LAX.	453.98
11/12/24		JH flight from HOU to LAX.	438.48
11/12/24		SR lodging for depoisition in Houston.	998.55
11/12/24		SR transportaion while Houston for deposition.	173.70
11/13/24		AA airfare from HOU to BOS for trial.	263.48
11/15/24		VO airfare from HOU to Santa Ana.	496.47
11/15/24		Vendor fee for videography services for the deposition of Alex Peloubet.	749.00
11/15/24		Vendor fee for expedited transcript with index of Alex Peloubet.	2,678.90
11/16/24		BA airport parking while at trial.	115.00
11/18/24		Vendor fee for expedited heating transcript day 4.	8,227.20
11/18/24		Vendor fee for expedited heating transcript day 1.	7,799.25
11/18/24		Vendor fee for expedited heating transcript day 2.	8,601.70
11/18/24		Vendor fee for expedited heating transcript day 3.	8,821.00
11/18/24		Vendor fee transcript in support of the Rhodium-Whinstone dispute.	51.30
11/18/24		AA transporation in Texas for depositions.	84.24
11/18/24		PB transporation in Texas for depositions.	826.75
11/18/24		HM airfare SD Houston to SD for trial.	588.94
11/18/24		HM transporation in Texas for Trail.	182.61
11/18/24		CH transportation in Texas for depositions.	99.44

Stris & Maher LLP

Invoice # 14317 December 19, 2024

Date	Task	Description	Amount
11/20/24		E. Brown invoice for deposition prep, deposition attendance and retainer for trial.	25,488.25
11/21/24		StoneTurn - Professional services rendered in October 2024.	18,577.50
11/25/24		Fulcrum Legal Graphics - Professional services rendered September 16 - October 16, 2024.	1,227.10
11/30/24		JND Discovery Invoice for November 2024.	3,765.00
11/30/24		Transportaion for JH while in Houston for trial.	58.81
12/01/24		Peregrine Consultants - Novemeber 2024.	16,350.00
		TOTAL EXPENSES ADVANCED	**$ 378,889.12**
		TOTAL THIS INVOICE	**$ 1,183,151.62**

Stris & Maher LLP

Invoice # 14317 December 19, 2024

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14249	11/01/24	79,868.00	63,894.40	15,973.60
14263	11/04/24	1,139,238.00	918,737.10	220,500.90
14269	11/14/24	1,632,686.25	1,329,529.25	303,157.00
		Previous Balance		$ 539,631.50
		Balance Due This Invoice		$ 1,183,151.62
		TOTAL BALANCE DUE		**$ 1,722,783.12**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 539,631.50	$ .00	$ .00	$ .00	$ 539,631.50

Stris

December 19, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14331
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through November 30, 2024

RE: Retention and Fee Applications

Total Professional Services	$ 46,190.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 46,190.00**
Previous Balance	$ 12,030.00
TOTAL BALANCE DUE	**$ 58,220.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14331 December 19, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
11/01/24	PS	Review draft fee statement and confer with EB regarding same.	.30	1250.00	375.00
11/01/24	EB	Continue preparing, conferring with PS regarding, and advising NC regarding portions of August fee statement.	.50	1100.00	550.00
11/01/24	CHH	Update draft fee statement per instructions from PS and EB.	.40	325.00	130.00
11/04/24	PS	Review updated draft fee statement and confer with team regarding revisions to same.	.40	1250.00	500.00
11/04/24	EB	Advise ASA regarding revisions to August and begin preparing September portions of fee statement.	4.10	1100.00	4,510.00
11/04/24	ASA	Assist EB with preparation of August portion of fee statement.	.90	325.00	292.50
11/05/24	VO	Review, confer with PS about, and revise first monthly fee application (2.7); prepare email to B. Howell regarding same (0.1).	2.80	875.00	2,450.00
11/05/24	PS	Review fee statement and confer with VO regarding same.	.50	1250.00	625.00
11/05/24	EB	Continue preparing September portions of monthly fee statement.	6.50	1100.00	7,150.00
11/05/24	CHH	Continue assisting with prepartion of monthly fee statement.	.50	325.00	162.50
11/08/24	EB	Begin working on October fee statement.	1.00	1100.00	1,100.00
11/12/24	EB	Continue preparing portions of October fee statement.	6.20	1100.00	6,820.00
11/13/24	EB	Continue preparing portions of October fee statement.	1.80	1100.00	1,980.00
11/14/24	EB	Continue preparing portions of October fee statement (3.9); review order and correspond with B. Rice and B. Howell regarding client inquiry concerning ordinary course declarations (0.2).	4.10	1100.00	4,510.00
11/15/24	EB	Advise NC regarding October fee statement (0.2); review, revise, and continue preparing portions of same (3.0).	3.20	1100.00	3,520.00
11/15/24	NC	Continue assisting EB with preparation of portions of October monthly fee statement.	1.20	325.00	390.00
11/18/24	EB	Continue preparing portions of October fee statement.	2.50	1100.00	2,750.00

Stris & Maher LLP

Invoice # 14331 December 19, 2024

Date	Tkpr	Description	Hours	Rate	Amount
11/19/24	EB	Continue preparing portions of October fee statement (2.4); advise ASA regarding same (0.2).	2.60	1100.00	2,860.00
11/19/24	ASA	Assist EB with preparation of portions of October fee statement.	2.50	325.00	812.50
11/20/24	EB	Revise portions from ASA and continue preparing portions of October fee statement.	1.00	1100.00	1,100.00
11/21/24	VO	Review and revise second monthly fee application.	1.10	875.00	962.50
11/25/24	EB	Begin preparing portions of November fee statement.	1.40	1100.00	1,540.00
11/26/24	EB	Continue preparing portion of November fee statement.	1.00	1100.00	1,100.00
		TOTAL PROFESSIONAL SERVICES			**$ 46,190.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	1.20	1,250.00	1,500.00
Elizabeth Brannen	EB	Partner	35.90	1,100.00	39,490.00
Victor O'Connell	VO	Partner	3.90	875.00	3,412.50
Andrew Atsalis	ASA	Fellow	3.40	325.00	1,105.00
Cynthia Huang	CHH	Fellow	.90	325.00	292.50
Nicholas Capalbo	NC	Fellow	1.20	325.00	390.00
Total			**46.50**		**$ 46,190.00**

TOTAL THIS INVOICE **$ 46,190.00**

Stris & Maher LLP

Invoice # 14331 December 19, 2024

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14261	11/04/24	47,165.00	37,732.00	9,433.00
14284	11/14/24	12,985.00	10,388.00	2,597.00

Previous Balance	$ 12,030.00
Balance Due This Invoice	$ 46,190.00
TOTAL BALANCE DUE	**$ 58,220.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 12,030.00	$ .00	$ .00	$ .00	$ 12,030.00

Stris

December 19, 2024

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14332
Client # 00346
Matter # 008

INVOICE SUMMARY

For professional services rendered through November 30, 2024

RE: Non-working Travel for Whinstone Dispute

Total Professional Services	$ 63,785.00
50% discount	$ -31,892.50
Net Professional Services	$ 31,892.50
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 31,892.50**
Previous Balance	$ 6,829.25
TOTAL BALANCE DUE	**$ 38,721.75**

Electronic Invoice

Stris & Maher LLP

Invoice # 14332 December 19, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
11/01/24	BA	Travel Dallas to Dulles, part of return trip from depositions of T. Lewis and J. Matthews.	3.00	1050.00	3,150.00
11/07/24	VO	Travel LGB - HOU for pretrial conference and trial.	5.20	875.00	4,550.00
11/07/24	BA	Travel from Montpelier VT to Houston Texas for trial.	4.70	1050.00	4,935.00
11/07/24	JS	Travel to Houston for trial.	5.10	875.00	4,462.50
11/07/24	CHH	Travel from LAS to HOU.	6.00	325.00	1,950.00
11/07/24	JH	Travel from LAX to HOU for trial.	5.00	325.00	1,625.00
11/07/24	PB	Travel to Houston for trial.	4.30	725.00	3,117.50
11/07/24	ASA	Travel from BOS to IAH for trial.	8.00	325.00	2,600.00
11/07/24	HM	Travel from SAN to IAH for trial.	6.50	600.00	3,900.00
11/15/24	VO	Travel HOU-SNA.	5.50	875.00	4,812.50
11/15/24	JS	Travel home from Houston following trial.	4.80	875.00	4,200.00
11/15/24	PB	Return travel from trial.	6.80	725.00	4,930.00
11/16/24	BA	Travel back to Montpelier VT from Houston Texas following Whinstone trial.	8.50	1050.00	8,925.00
11/16/24	CHH	Travel from HOU to LAS.	6.20	325.00	2,015.00
11/16/24	JH	Travel home to Los Angeles from Houston bankruptcy trial.	6.00	325.00	1,950.00
11/16/24	ASA	Travel back to Massachusetts from Houston, Texas following Whinstone trial.	8.50	325.00	2,762.50
11/16/24	HM	Travel from IAH to SAN.	6.50	600.00	3,900.00
		TOTAL PROFESSIONAL SERVICES			**$ 63,785.00**
		50% discount			$ -31,892.50
		NET PROFESSIONAL SERVICES			**$ 31,892.50**

Stris & Maher LLP

Invoice # 14332 December 19, 2024

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Bridget Asay	BA	Partner	16.20	1,050.00	17,010.00
Victor O'Connell	VO	Partner	10.70	875.00	9,362.50
John Stokes	JS	Partner	9.90	875.00	8,662.50
Peter Brody	PB	Associate	11.10	725.00	8,047.50
Helen Marsh	HM	Associate	13.00	600.00	7,800.00
Andrew Atsalis	ASA	Fellow	16.50	325.00	5,362.50
Cynthia Huang	CHH	Fellow	12.20	325.00	3,965.00
Jaida Hodge-Adams	JH	Fellow	11.00	325.00	3,575.00
Total			**100.60**		**$ 63,785.00**

TOTAL THIS INVOICE **$ 31,892.50**

Stris & Maher LLP

Invoice # 14332 December 19, 2024

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14295	11/14/24	34,146.25	27,317.00	6,829.25

Previous Balance	$ 6,829.25
Balance Due This Invoice	$ 31,892.50
TOTAL BALANCE DUE	**$ 38,721.75**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 6,829.25	$ .00	$ .00	$ .00	$ 6,829.25

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

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

STRIS & MAHER LLP'S THIRD MONTHLY FEE STATEMENT
FOR THE PERIOD DECEMBER 1, 2024, THROUGH DECEMBER 31, 2024

Stris & Maher LLP ("Stris & Maher") submits, pursuant to the Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the "Interim Compensation Order") (ECF No. 264) entered on October 14, 2024, this monthly fee statement for the payment of interim compensation rendered and reimbursement of expenses incurred during the period December 1, 2024 through December 31, 2024 (the "Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $117,981.80 (80% of the services rendered), plus $31,592.25 (100% of the interim expenses incurred). *See* Interim Compensation Order at ¶ 1(a). Summaries of the fees and expenses are attached as Exhibits 1, 2, and 3. Invoices reflecting detailed time entries are attached hereto as Exhibit 4.

[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), 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.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall serve within 14 days after delivery of the Monthly Fee Statement a written notice, via email, upon Stris & Maher and each of the other Fee Notice Parties (as listed below) (the "Written Notice"). The Written Notice shall set forth with reasonable detail the nature of the objection and the amount at issue. If the parties are unable to reach a resolution of the objection within 14 calendar days, the objecting party shall file its objection (the "Objection") with this Court within 3 business days and serve such Objection on Stris & Maher and each of the other Fee Notice Parties. See Interim Compensation Order ¶ 1(c).

The Fee Notice Parties as defined in the Interim Compensation Order are:

a. Rhodium Enterprises, Inc., Attn: Charles Topping (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 2617 Bissonnet Street, Suite 234, Houston, Texas 77005;

b. Debtors' Bankruptcy Counsel, c/o Quinn Emanuel Urquhart & Sullivan, LLP, Attn: Patricia B. Tomasco (pattytomasco@quinnemanuel.com); Razmig Izakelian (razmigizakelian@quinnemanuel.com), Alain Jaquet (alainjaquet@quinnemanuel.com), and Joanna D. Caytas (joannacaytas@quinnemanuel.com), 700 Louisiana, Suite 3900, Houston, Texas 77002;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (mrobinson@provincefirm.com); David Dunn (ddunn@provincefirm.com); Kirsten Lee (klee@province.com); and Andrew Popescu (apopescu@provincefirm.com), 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074;

d. Galaxy Digital, LLC, in its capacity as DIP Agent, c/o Orrick, Herrington & Sutcliffe LLP, Ryan C. Wooten (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 51 West 52nd Street, New York, New York 10019;

e. Counsel or proposed counsel to any statutory committee appointed in these Chapter 11 Cases; and

f. United States Trustee, Ha Minh Nguyen (ha.nguyen@usdoj.gov), 515 Rusk, Suite 3516, Houston, Texas 77002.

If no objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Stris & Maher an amount equal to 80% of the fees and 100% of the expenses listed herein, or if an objection is timely served, such percentage of fees and expenses that are not subject to an objection, as stated in the Interim Compensation Order.

Respectfully submitted this 21st day of January, 2025.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
Patricia B. Tomasco (SBN 01797600)
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Cameron Kelly (SBN 24120936)
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-and-

STRIS & MAHER LLP

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-and-

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408 W. 11th Street, 5th Floor
Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on January 21, 2025, a true and correct copy of the foregoing Monthly Fee Statement was served through the Court's Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco
Patricia B. Tomasco

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	11.70	$8,990.00	$7,192.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	144.00	$132,202.25	$105,761.80
007	Retention and Fee Applications	6.00	$6,285.00	$5,028.00
Total		161.7	$147,477.25	$117,981.80

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,100.00	6.60	$7,260.00
Bridget Asay	Partner	1997	$1,050.00	.10	$105.00
Andrew Atsalis	Litigation Fellow	N/A	$325.00	5.00	$1,625.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,100.00	6.50	$7,150.00
Bridget Asay	Partner	1997	$1,050.00	17.40	$18,270.00
Victor O'Connell	Partner	2012	$875.00	5.00	$4,375.00
John Stokes	Partner	2016	$875.00	44.10	$38,587.50
Colleen Smith	Associate	2015	$725.00	14.10	$10,222.50
Peter Brody	Associate	2016	$725.00	3.00	$2,175.00
Helen Marsh	Associate	2024	$600.00	22.10	$13,260.00
Andrew Atsalis	Litigation Fellow	N/A	$325.00	5.60	$1,820.00
Cynthia Huang	Litigation Fellow	N/A	$325.00	7.80	$2,535.00
Jaida Hodge-Adams	Litigation Fellow	N/A	$325.00	18.40	$5,980.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,100.00	4.60	$5,060.00
Victor O'Connell	Partner	2012	$875.00	1.40	$1,225.00

EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
E-discovery platform fees	$3,765.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
E-discovery platform fees	$1,976.00
Expert fees	$25,851.25
Total	$27,827.25

Stris

January 13, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14380
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through December 31, 2024

RE: Midas Green Litigation

Total Professional Services	$ 8,990.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 8,990.00**
Previous Balance	$ 4,926.00
TOTAL BALANCE DUE	**$ 13,916.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14380 January 13, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
12/06/24	EB	Review and analyze motion to lift bankruptcy stay to permit resolution of patent case (0.4); correspond with R. Harrington (0.1) and confer with P. Tomasco and R. Harrington (0.2) and Texas counsel (0.2) regarding same.	.90	1100.00	990.00
12/08/24	EB	Review materials in support of request for entry of summary judgment order.	.10	1100.00	110.00
12/09/24	EB	Review and respond to correspondence from Texas counsel regarding steps to seek entry of summary judgment order.	.10	1100.00	110.00
12/10/24	EB	Correspond with R. Harrington regarding proposed revisions to motion to lift stay to permit entry of judgment and next steps in support of same.	.80	1100.00	880.00
12/16/24	BA	Review proposed motion to lift stay in Midas Green litigation and correspond with EB regarding same.	.10	1050.00	105.00
12/17/24	EB	Correspond with [redacted] regarding [redacted].	.10	1100.00	110.00
12/19/24	EB	Correspond with co-counsel R. Harrington regarding status of bankruptcy court submission requesting to lift stay.	.50	1100.00	550.00
12/20/24	EB	Correspond with R. Harrington and Texas counsel regarding submissions to bankruptcy and district courts to request written ruling on summary judgment order (0.8); advise NC and MN regarding draft motion and proposed order seeking same (0.4).	1.20	1100.00	1,320.00
12/23/24	EB	Review draft motion and proposed order asking district court to enter summary judgment order (0.1); advise MN regarding revisions to same (0.2).	.30	1100.00	330.00
12/27/24	EB	Continue revising and drafting portions of motion for order on summary judgment (1.3); review supporting research from ASA (0.1); advise ASA regarding further revisions in light of same (0.2).	1.60	1100.00	1,760.00
12/27/24	ASA	Conducting research and review relevant transcript material to assist EB with portions of motion for written summary judgment order.	2.00	325.00	650.00

Stris

January 13, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14366
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through December 31, 2024

RE: Whinstone Litigation

Total Professional Services	$ 104,375.00
Total Expenses Advanced	$ 27,827.25
TOTAL THIS INVOICE	**$ 132,202.25**
Previous Balance	$ 1,722,783.12
TOTAL BALANCE DUE	**$ 1,854,985.37**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Stris & Maher LLP

Invoice # 14366 January 13, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
12/02/24	JH	Organize case materials including review and update of bankruptcy docket.	3.00	325.00	975.00
12/03/24	BA	Participate in portion of teleconference with potential [redacted] expert [redacted], with JS, W. Thompson, and A. Davis (0.5); participate in weekly client call with bankruptcy and litigation counsel (0.4); evaluate next steps (0.1).	1.00	1050.00	1,050.00
12/03/24	JS	Attend call with potential [redacted] expert (0.6); attend portion of weekly touch-point call (0.6); evaluate next steps in light of same (0.7).	1.90	875.00	1,662.50
12/03/24	JH	Continue organizing materials for phase 2 and updating bankruptcy docket.	2.00	325.00	650.00
12/04/24	JS	Confer with W. Thompson and J. Cohn regarding timing and strategy for [redacted] phase (0.5); review [redacted] agreements and evaluate same in connection with potential [redacted] (1.7); confer with P. Tomasco regarding same (0.3).	2.50	875.00	2,187.50
12/04/24	CHH	Review and update matter docket.	.10	325.00	32.50
12/04/24	JH	No Charge - Update docket (0.5); review November 26 status conference hearing audio and transcript (2.5).	3.00	325.00	N/C
12/05/24	BA	Correspond with bankruptcy counsel and with JS and PB regarding proposed disclosure of [redacted] materials [redacted] to creditors' committee.	.30	1050.00	315.00
12/05/24	JS	Work on strategy for [redacted] of litigation.	1.90	875.00	1,662.50
12/05/24	CHH	Review and update matter review and update matter docket.	.20	325.00	65.00
12/05/24	JH	No Charge - Update bankruptcy docket.	1.40	325.00	N/C
12/05/24	ASA	Organize case materials including audio files received from court.	.20	325.00	65.00
12/06/24	BA	Participate in teleconference with JS, W. Thompson, A. Davis, and potential [redacted] expert for [redacted] (0.7); correspond with JS and EB regarding potential additional [redacted] modeling by [redacted] (0.1).	.80	1050.00	840.00

Stris & Maher LLP

Invoice # 14366 January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/06/24	JH	Update bankruptcy docket.	.80	325.00	260.00
12/06/24	EZ	No Charge - Update Bankruptcy docket (1.0).	1.00	325.00	N/C
12/09/24	EB	Attention to case management.	.40	1100.00	440.00
12/09/24	BA	Review and correspond with litigation team regarding revisions to materials for [redacted] (0.7); review and manage response to request from bankruptcy counsel regarding sharing of [redacted] materials in compliance with protective order requirements (0.4).	1.10	1050.00	1,155.00
12/09/24	JS	Review, evaluate, and prepare correspondence regarding [redacted] in relation to Whinstone litigation.	2.40	875.00	2,100.00
12/09/24	HM	Advise and assist CHH to compile [redacted] and corresponding [redacted] for creditors' counsel.	1.10	600.00	660.00
12/10/24	JS	Further review and revise slides regarding [redacted].	.90	875.00	787.50
12/10/24	CHH	Compile and edit [redacted] for creditors' committee's review.	1.50	325.00	487.50
12/10/24	HM	Advise and assist CHH to compile deposition exhibits for creditors' counsel.	.50	600.00	300.00
12/11/24	EB	Correspond with JS and BA regarding additional analysis by [redacted] (0.1); attend teleconference with [redacted] regarding same (0.1).	.20	1100.00	220.00
12/11/24	BA	Correspond with JS, W. Thompson, J. Cohn, and A. Davis regarding [redacted] expert (0.1); correspond with EB and JS regarding next steps for additional [redacted] from [redacted] (0.2).	.30	1050.00	315.00
12/11/24	JS	Further evaluate next steps on [redacted] phase of case (1.3); further review slides and email regarding [redacted] (0.6).	1.90	875.00	1,662.50
12/11/24	CHH	Continue compiling [redacted] materials for creditors' counsel.	5.00	325.00	1,625.00
12/11/24	JH	Update bankruptcy docket.	2.30	325.00	747.50
12/11/24	ASA	Update internal memoranda regarding additional developments.	1.00	325.00	325.00

Stris & Maher LLP

Invoice # 14366 January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/11/24	HM	Attention to documents collected for creditors' counsel (2.0); coordinate with Todd Stefan of Setec Investigations and [redacted] to transfer [redacted] data to [redacted] (0.4).	2.40	600.00	1,440.00
12/12/24	EB	Correspond with BA and [redacted] regarding teleconference to discuss information in support of [redacted] analysis (0.1); correspond with [redacted] and [redacted] regarding same (0.1).	.20	1100.00	220.00
12/13/24	EB	Prepare for (0.5) and attend (0.4) teleconference with BA, ASA, and [redacted] to discuss information in support of [redacted] analysis; attention to resulting action items including correspondence to client regarding open questions (0.3).	1.20	1100.00	1,320.00
12/13/24	BA	Prepare for (0.2) and attend teleconference with [redacted], EB, BA, and ASA regarding information in support of [redacted] analysis (0.3); correspond with JS and team regarding sharing [redacted] (0.1).	.60	1050.00	630.00
12/13/24	JS	Work on 50(b) opposition.	8.00	875.00	7,000.00
12/13/24	ASA	Attend teleconference with [redacted], EB, and BA regarding information in support of [redacted] analysis (0.3); refine and circulate notes from call (0.1); confirm confidentiality of relevant documents to discuss with client (0.5).	.90	325.00	292.50
12/16/24	EB	Prepare for (0.5) and attend (0.6) teleconference with BA, ASA, [redacted] and [redacted] regarding information in support of [redacted] analysis; attention to resulting action items (0.2); review correspondence regarding and begin reviewing interim order on motion to assume (0.2)	1.50	1100.00	1,650.00
12/16/24	BA	Attend call with EB, BA, ASA, [redacted] and expert [redacted] regarding information in support of [redacted] analysis (0.6).	.60	1050.00	630.00
12/16/24	JS	Attention to high-priority action items in connection with phase two [redacted].	3.30	875.00	2,887.50
12/16/24	CS	Review and analyze bankruptcy court order on phase 1 of motion to assume executory contracts.	1.00	725.00	725.00
12/16/24	JH	Update bankruptcy docket.	1.00	325.00	325.00

Stris & Maher LLP

Invoice # 14366 January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/16/24	PB	Review and analyze bankruptcy court trial order.	1.20	725.00	870.00
12/16/24	ASA	Attend call with EB, BA, [redacted] and expert [redacted] regarding information in support of [redacted] analysis (0.6); draft and circulate notes (0.4); create shared folder and link to facilitate upload of material by client (0.3).	1.30	325.00	422.50
12/16/24	HM	Review and analyze interim order on phase 1 of the motion to assume.	2.00	600.00	1,200.00
12/17/24	BA	Correspond with bankruptcy counsel regarding [redacted] for sharing with creditors committee, and correspond with JHA and HM to direct preparation of same (0.3); review court's phase 1 ruling (0.8).	1.10	1050.00	1,155.00
12/17/24	JS	Review and evaluate research issues and strategy in connection with phase two [redacted].	2.00	875.00	1,750.00
12/18/24	EB	Attend teleconference with BA and JS regarding status and high priority action items in support of phase two [redacted] claim (0.5); attend teleconference with JS, CS, PB and HM regarding research and high priority action items [redacted] (0.4); correspond with ASA and [redacted] regarding information in support of [redacted] analysis (0.1).	1.00	1100.00	1,100.00
12/18/24	BA	Confer with JS and EB regarding priority action items including [redacted] and [redacted] analyses.	.50	1050.00	525.00
12/18/24	JS	Review and evaluate order on phase 1 and high-priority action items in connection with phase two and [redacted] (3.2); attend teleconferences with EB and BA (0.5) and EB, CS, PB, and HM (0.4) regarding same.	4.10	875.00	3,587.50
12/18/24	CS	Teleconference with EB, HM, JS, HM, and PB regarding research and high priority action items [redacted] (0.4).	.40	725.00	290.00
12/18/24	JH	Prepare materials for Quinn Emmanuel co-counsel [redacted] at HM request.	5.00	325.00	1,625.00
12/18/24	PB	Teleconference with EB, JS, CS, and HM regarding research projects and high-priority action items.	.40	725.00	290.00

Stris & Maher LLP

Invoice # 14366 January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/18/24	ASA	No Charge - Review and analyze bankruptcy court order on phase 1 of motion to assume executory contracts (0.9).	.90	325.00	N/C
12/18/24	HM	Teleconference with EB, JS, CS, and PB regarding research and high priority action items in support of [redacted] (0.4); coordinate with JHA to collect, quality check, and send [redacted] to creditors' counsel (3.1).	3.50	600.00	2,100.00
12/19/24	VO	Confer with [redacted] regarding materials including [redacted] update and drafting of notice [redacted] (0.1); prepare same (1.9); emails with team regarding same and incorporate team comments (0.3); review [redacted] contract and prepare draft notice [redacted] (0.4); emails with PB regarding same (0.1).	2.80	875.00	2,450.00
12/19/24	EB	Review documentation from [redacted] (0.1); advise ASA regarding analysis of and questions concerning same (0.1).	.20	1100.00	220.00
12/19/24	BA	Review and revise draft materials regarding phase 1 and correspond with JS regarding same (0.2); review email from Whinstone's counsel regarding conferral for phase 2, correspond with JS regarding same, and propose draft response to same to litigation team (0.4); correspond with JS, PB, and HM regarding support for co-counsel response to creditors' committee request for information (0.3); review correspondence with [redacted] and P. Brody regarding technical steps for upcoming production (0.2).	1.10	1050.00	1,155.00
12/19/24	JS	Further evaluate high priority research issues in connection with phase two [redacted].	1.50	875.00	1,312.50
12/19/24	ASA	Analyze updated [redacted] spreadsheet, summarize updates for EB and BA, and provide spreadsheet to [redacted].	2.00	325.00	650.00
12/19/24	HM	Conduct research for [redacted] case (4.2); review and respond to team correspondence regarding materials provided to creditors' counsel (0.5).	4.70	600.00	2,820.00
12/20/24	VO	Review, comment, and correspond with client representatives regarding phase 1 update materials.	.40	875.00	350.00
12/20/24	VO	Correspond with PB regarding notice to begin services [redacted].	.10	875.00	87.50

Stris & Maher LLP

Invoice # 14366 January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/20/24	EB	Confer with PB regarding action items in support of [redacted] phase (0.1); correspond with BA and JS regarding same (0.1); correspond with [redacted], BA and ASA regarding additional documentation and advise ASA regarding provision of same to [redacted] (0.2); review research updates from HM (0.2).	.60	1100.00	660.00
12/20/24	BA	Review and analyze phase one decision with respect to strategy and options for phase 2 (3.5); correspond with JS, [redacted], and [redacted] regarding response to Whinstone's counsel regarding phase 2 conferral, and revise and send same to Whinstone's counsel (0.4); correspond with EB regarding data for [redacted] (0.1).	4.00	1050.00	4,200.00
12/20/24	CS	Review and analyze Texas law regarding [redacted] in contract disputes [redacted].	5.90	725.00	4,277.50
12/20/24	ASA	Share updated [redacted] spreadsheet with expert [redacted] via secure link.	.20	325.00	65.00
12/20/24	HM	Conduct research for [redacted] case.	2.60	600.00	1,560.00
12/21/24	HM	Continue research for [redacted] case.	2.70	600.00	1,620.00
12/23/24	BA	Continue reviewing and analyzing phase one decision and correspond with JS regarding same (1.0); review research from HM and PB regarding [redacted] issues related to [redacted] and further research same (1.0); review correspondence from Whinstone's counsel regarding phase 2 and correspond with JS and PB regarding same (0.2); review correspondence from [redacted] regarding client matter, confer with JS regarding same, and propose edits to potential [redacted] communication (0.5).	2.70	1050.00	2,835.00
12/23/24	JS	Attention to high-priority action items in connection with phase two [redacted].	5.50	875.00	4,812.50
12/23/24	CS	Continue reviewing and analyzing Texas law regarding [redacted] in contract disputes [redacted].	3.70	725.00	2,682.50
12/23/24	PB	Correspondence regarding questions from counsel for special committee.	.30	725.00	217.50

Stris & Maher LLP

Invoice # 14366 January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/24/24	CS	Continue reviewing and analyzing Texas law regarding [redacted] in contract disputes [redacted].	3.10	725.00	2,247.50
12/26/24	VO	Finalize and submit [redacted] (0.5); confer with Rhodium legal counsel regarding same (0.1); emails with client regarding same (0.1).	.70	875.00	612.50
12/26/24	BA	Correspond with bankruptcy counsel regarding disclosures to creditors' committee.	.30	1050.00	315.00
12/26/24	JS	Review and evaluate [redacted] memoranda and next steps on same in connection with phase two [redacted].	2.80	875.00	2,450.00
12/26/24	JH	Update bankruptcy docket and review ongoing correspondence.	3.50	325.00	1,137.50
12/27/24	BA	Continue researching issues relating to [redacted] and correspond with JS regarding same; (1.5); review and revise proposed response to opposing counsel regarding phase 2, correspond with JS regarding same, and convey response to opposing counsel (0.4); correspond with VO regarding availability of trial transcripts (0.1).	1.90	1050.00	1,995.00
12/27/24	JS	Further evaluate research and discovery issues in connection with phase two [redacted].	1.00	875.00	875.00
12/27/24	JH	Send bankruptcy trial transcripts to VO.	.80	325.00	260.00
12/27/24	PB	Research regarding [redacted] clauses.	1.10	725.00	797.50
12/30/24	VO	Confer with JS regarding planning for Phase 2 (0.5); further confer with JS and EB regarding same (0.5).	1.00	875.00	875.00
12/30/24	EB	Confer with VO and JS regarding high priority action items in support of phase 2 [redacted] (0.5); confer with BA regarding expert-related action items in support of same (0.1); correspond with HM regarding [redacted] memorandum (0.2); correspond with CS regarding revisions to [redacted] expert deposition outline (0.1).	.90	1100.00	990.00

Stris & Maher LLP

Invoice # 14366 January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/30/24	BA	Review correspondence from opposing counsel regarding case schedule and correspond with team regarding further response (0.3); review client inquiry regarding delivery of new miners and correspond with litigation team regarding response to same (0.2).	.50	1050.00	525.00
12/30/24	JS	Call with EB and VO regarding high priority action items for [redacted] (0.5); call with VO regarding high priority action items for [redacted] (0.5); review materials in connection with [redacted] (1.3).	2.30	875.00	2,012.50
12/31/24	EB	Correspond with BA and JS regarding analysis of [redacted] ancillary services charges (0.2); attention to case management (0.1).	.30	1100.00	330.00
12/31/24	BA	Correspond with litigation team regarding issues related to phase 2 and correspond with opposing counsel regarding same.	.60	1050.00	630.00
12/31/24	JS	Continue research in connection with high-priority action items in connection with [redacted] phase.	2.10	875.00	1,837.50
12/31/24	CHH	Prepare Imperium discovery uploads for transmission to [redacted].	1.00	325.00	325.00
12/31/24	HM	Conduct research for [redacted].	2.60	600.00	1,560.00
		TOTAL PROFESSIONAL SERVICES			**$ 104,375.00**

Stris & Maher LLP

Invoice # 14366 January 13, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	6.50	1,100.00	7,150.00
Bridget Asay	BA	Partner	17.40	1,050.00	18,270.00
Victor O'Connell	VO	Partner	5.00	875.00	4,375.00
John Stokes	JS	Partner	44.10	875.00	38,587.50
Colleen Smith	CS	Associate	14.10	725.00	10,222.50
Peter Brody	PB	Associate	3.00	725.00	2,175.00
Helen Marsh	HM	Associate	22.10	600.00	13,260.00
Andrew Atsalis	ASA	Fellow	5.60	325.00	1,820.00
Cynthia Huang	CHH	Fellow	7.80	325.00	2,535.00
Jaida Hodge-Adams	JH	Fellow	18.40	325.00	5,980.00
Total			**144.00**		**$ 104,375.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
12/01/24		Logikcull December invoice.	1,976.00
12/20/24		StoneTurn Group - Professional services rendered for November 2024.	25,851.25
		TOTAL EXPENSES ADVANCED	**$ 27,827.25**
		TOTAL THIS INVOICE	**$ 132,202.25**

Stris & Maher LLP

Invoice # 14366 January 13, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14249	11/01/24	79,868.00	63,894.40	15,973.60
14263	11/04/24	1,139,238.00	918,737.10	220,500.90
14269	11/14/24	1,632,686.25	1,329,529.25	303,157.00
14317	12/19/24	1,183,151.62	.00	1,183,151.62
		Previous Balance		$ 1,722,783.12
		Balance Due This Invoice		$ 132,202.25
		TOTAL BALANCE DUE		**$ 1,854,985.37**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
1,183,151.62	$ 303,157.00	$ 236,474.50	$ .00	$$.00	1,722,783.12

Stris & Maher LLP

Invoice # 14380 January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/30/24	EB	Review updated drafts (0.1); advise ASA regarding further changes (0.1); and continue revising draft motion for entry of written order confirming grant of summary judgment (0.3).	.50	1100.00	550.00
12/30/24	ASA	Draft proposed order and portions of motion for written summary judgment order for EB and assist with revisions to same.	3.00	325.00	975.00
12/31/24	EB	Continue revising motion for entry of written summary judgment order.	.50	1100.00	550.00
		TOTAL PROFESSIONAL SERVICES			**$ 8,990.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	6.60	1,100.00	7,260.00
Bridget Asay	BA	Partner	.10	1,050.00	105.00
Andrew Atsalis	ASA	Fellow	5.00	325.00	1,625.00
Total			**11.70**		**$ 8,990.00**

TOTAL THIS INVOICE **$ 8,990.00**

Stris & Maher LLP

Invoice # 14380 January 13, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14251	11/01/24	855.00	684.00	171.00
14257	11/04/24	8,190.00	8,058.00	132.00
14283	11/14/24	4,755.00	4,557.00	198.00
14330	12/19/24	4,425.00	.00	4,425.00

Previous Balance	$ 4,926.00
Balance Due This Invoice	$ 8,990.00
TOTAL BALANCE DUE	**$ 13,916.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 4,425.00	$ 198.00	$ 303.00	$ .00	$ .00	$ 4,926.00

Stris

January 13, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14381
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through December 31, 2024

RE: Retention and Fee Applications

Total Professional Services	$ 6,285.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 6,285.00**
Previous Balance	$ 58,220.00
TOTAL BALANCE DUE	**$ 64,505.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14381 January 13, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
12/13/24	EB	Continue preparing portions of November fee statement.	1.40	1100.00	1,540.00
12/17/24	EB	Continue preparing portions of November fee statement.	.90	1100.00	990.00
12/19/24	EB	Continue preparing portions of November fee statement.	2.30	1100.00	2,530.00
12/20/24	VO	Work on fee application.	1.40	875.00	1,225.00
		TOTAL PROFESSIONAL SERVICES			**$ 6,285.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	4.60	1,100.00	5,060.00
Victor O'Connell	VO	Partner	1.40	875.00	1,225.00
Total			**6.00**		**$ 6,285.00**

TOTAL THIS INVOICE **$ 6,285.00**

Stris & Maher LLP

Invoice # 14381 January 13, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14261	11/04/24	47,165.00	37,732.00	9,433.00
14284	11/14/24	12,985.00	10,388.00	2,597.00
14331	12/19/24	46,190.00	.00	46,190.00

Previous Balance	$ 58,220.00
Balance Due This Invoice	$ 6,285.00
TOTAL BALANCE DUE	**$ 64,505.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 46,190.00	$ 2,597.00	$ 9,433.00	$ .00	$ .00	$ 58,220.00

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

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

STRIS & MAHER LLP'S FIFTH MONTHLY FEE STATEMENT
FOR THE PERIOD JANUARY 1, 2025, THROUGH JANUARY 31, 2025

Stris & Maher LLP ("Stris & Maher") submits, pursuant to the Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the "Interim Compensation Order") (ECF No. 264) entered on October 14, 2024, this monthly fee statement for the payment of interim compensation rendered and reimbursement of expenses incurred during the period January 1, 2025 through January 31, 2025 (the "Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $531,962.00 (80% of the services rendered), plus $209,033.47 (100% of the interim expenses incurred). *See* Interim Compensation Order at ¶ 1(a). Summaries of the fees and expenses are attached as Exhibits 1, 2, and 3. Invoices reflecting detailed time entries are attached hereto as Exhibit 4.

[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), 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.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall serve within 14 days after delivery of the Monthly Fee Statement a written notice, via email, upon Stris & Maher and each of the other Fee Notice Parties (as listed below) (the "Written Notice"). The Written Notice shall set forth with reasonable detail the nature of the objection and the amount at issue. If the parties are unable to reach a resolution of the objection within 14 calendar days, the objecting party shall file its objection (the "Objection") with this Court within 3 business days and serve such Objection on Stris & Maher and each of the other Fee Notice Parties. See Interim Compensation Order ¶ 1(c).

The Fee Notice Parties as defined in the Interim Compensation Order are:

a. Rhodium Enterprises, Inc., Attn: Charles Topping (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 2617 Bissonnet Street, Suite 234, Houston, Texas 77005;

b. Debtors' Bankruptcy Counsel, c/o Quinn Emanuel Urquhart & Sullivan, LLP, Attn: Patricia B. Tomasco (pattytomasco@quinnemanuel.com); Razmig Izakelian (razmigizakelian@quinnemanuel.com), Alain Jaquet (alainjaquet@quinnemanuel.com), and Joanna D. Caytas (joannacaytas@quinnemanuel.com), 700 Louisiana, Suite 3900, Houston, Texas 77002;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (mrobinson@provincefirm.com); David Dunn (ddunn@provincefirm.com); Kirsten Lee (klee@province.com); and Andrew Popescu (apopescu@provincefirm.com), 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074;

d. Galaxy Digital, LLC, in its capacity as DIP Agent, c/o Orrick, Herrington & Sutcliffe LLP, Ryan C. Wooten (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 51 West 52nd Street, New York, New York 10019;

e. Counsel or proposed counsel to any statutory committee appointed in these Chapter 11 Cases; and

f. United States Trustee, Ha Minh Nguyen (ha.nguyen@usdoj.gov), 515 Rusk, Suite 3516, Houston, Texas 77002.

If no objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Stris & Maher an amount equal to 80% of the fees and 100% of the expenses listed herein, or if an objection is timely served, such percentage of fees and expenses that are not subject to an objection, as stated in the Interim Compensation Order.

Respectfully submitted this 24th day of February, 2025.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
Patricia B. Tomasco (SBN 01797600)
Joanna D. Caytas (SBN 24127230)
Cameron Kelly (SBN 24120936)
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-and-

STRIS & MAHER LLP

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Victor O'Connell (pro hac vice)
John Stokes (pro hac vice)
Peter Brody (pro hac vice)
Helen Marsh (pro hac vice)

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-and-

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408 W. 11th Street, 5th Floor
Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on February 24, 2025, a true and correct copy of the foregoing Monthly Fee Statement was served through the Court's Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco
Patricia B. Tomasco

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	19.6	$21,615.00	$17,292.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	814.6	$634,762.50	$507,810.00
007	Retention and Fee Applications	8.3	$8575.00	$6,860.00
Total			$664,952.50	$531,962.00

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,250.00	11.90	$14,875.00
Bridget Asay	Partner	1997	$1,200.00	2.20	$2,640.00
Ken Halpern	Partner	1997	$1,100.00	2.90	$3,190.00
Andrew Atsalis	Litigation Fellow	N/A	$350.00	2.60	$910.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Peter Stris	Founding Partner	2001	$1,450.00	9.00	$13,050.00
Elizabeth Brannen	Managing Partner	2001	$1,250.00	72.80	$91,000.00
Bridget Asay	Partner	1997	$1,200.00	82.90	$99,480.00
Tillman Breckenridge	Partner	2003	$1,200.00	19.30	$23,160.00
Victor O'Connell	Partner	2012	$1,025.00	6.60	$6,765.00
John Stokes	Partner	2016	$1,025.00	80.40	$82,410.00
Colleen Smith	Associate	2015	$850.00	103.20	$87,720.00
Peter Brody	Associate	2016	$850.00	15.10	$12,835.00
Sarah Rahimi	Associate	2019	$750.00	80.00	$60,000.00
Helen Marsh	Associate	2024	$700.00	47.30	$33,110.00
Tanya Tice	Discovery Associate	1989	$525.00	115.50	$60,637.50
Monica Viramontes	Senior Paralegal	N/A	$425.00	9.60	$4,080.00
Andrew Atsalis	Litigation Fellow	N/A	$350.00	36.40	$12,740.00
Cynthia Huang	Litigation Fellow	N/A	$350.00	40.90	$14,315.00
Sebastian Delgado	Litigation Fellow	N/A	$350.00	.90	$315.00
Shayra Banta	Litigation Fellow	N/A	$350.00	23.20	$8,120.00
Nicholas Capalbo	Litigation Fellow	N/A	$350.00	25.40	$8,890.00
Jaida Hodge-Adams	Litigation Fellow	N/A	$350.00	46.10	$16,135.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,250.00	5.70	$7,125.00
Victor O'Connell	Partner	2012	$1,025.00	.80	$820.00
Nicholas Capalbo	Litigation Fellow	N/A	$350.00	1.80	$630.00

EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
E-discovery platform fees	$3,765.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
Printing for Phase 1 hearing	$6,687.77
Hotel accommodations for Phase 1 hearing	$30,919.21
Legal research	$116.49
Press release	$349.00
Litigation Support Vendors	$2,550.00
E-discovery platform fees	$2,646.00
Expert services for Phase 1 hearing	$162,000.00
Total	$205,268.47

EXHIBIT 4

Stris

February 21, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14471
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through January 31, 2025

RE: Midas Green Litigation

Total Professional Services	$ 21,615.00
Total Expenses Advanced	$ 3,765.00
TOTAL THIS INVOICE	**$ 25,380.00**
Previous Balance	$ 2,431.00
TOTAL BALANCE DUE	**$ 27,811.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14471 February 21, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
1/02/25	EB	Revise motion for entry of written summary judgment order and proposed order in support of same (1.1); correspond with BA regarding same (0.1).	1.20	1250.00	1,500.00
1/02/25	BA	Begin reviewing proposed filings seeking entry of judgment upon lifting of stay.	.30	1200.00	360.00
1/03/25	EB	Review materials in support of revisions to motion requesting written summary judgment order (0.5); correspond with BA, KH, PB, and SR regarding information in support of revisions to same and updated draft motion to lift stay from bankruptcy counsel (0.5); review and analyze related analysis and correspondence from BA and KH (0.3); revise and propose further revisions to both motions and accompanying proposed orders (1.9); correspond with bankruptcy and Texas counsel regarding same (0.1).	3.30	1250.00	4,125.00
1/03/25	BA	Review, analyze, and edit proposed filings seeking lifting of bankruptcy stay and entry of judgment upon lifting of stay, and correspond with EB and KH regarding same.	1.90	1200.00	2,280.00
1/03/25	ASA	Assist EB with analysis of named defendants in support of motion to lift stay.	.20	350.00	70.00
1/04/25	KJH	Research injunction waiver and review and provide related and additional comments on draft motion to lift stay.	2.90	1100.00	3,190.00
1/06/25	EB	Review and analyze proposed revisions from Texas counsel (0.1); correspond with Texas counsel regarding same (0.1).	.20	1250.00	250.00
1/07/25	EB	Review and analyze revisions proposed by Texas counsel to district court submission to prepare for upcoming discussion (0.2); attend teleconference with Texas counsel regarding same and corresponding bankruptcy court submission (0.4); correspond with Texas counsel regarding draft bankruptcy court submission and potential further revisions to same and district court submission (0.1); correspond with litigation fellows and Texas counsel regarding Midas Green bankruptcy proofs of claim (0.1); begin reviewing same and providing information to bankruptcy counsel in support of objections to same (0.5).	1.30	1250.00	1,625.00

Stris & Maher LLP

Invoice # 14471 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/07/25	ASA	Review and circulate Midas Green proof of claim for EB.	1.70	350.00	595.00
1/08/25	EB	Advise ASA and MN regarding compilation of documents requested by bankruptcy counsel (0.3); review and provide same (0.2); correspond with bankruptcy counsel (0.3) and Texas counsel (0.1) regarding status and supporting analysis.	.90	1250.00	1,125.00
1/08/25	ASA	Collect redacted documents from docket to assist preparation of Motion to Lift Stay in bankruptcy court in coordination with EB and MN.	.70	350.00	245.00
1/13/25	EB	Correspond with [redacted] regarding preservation notice and update Texas counsel regarding anticipated timing.	.10	1250.00	125.00
1/17/25	EB	Review objection status and deadline.	.10	1250.00	125.00
1/21/25	EB	Attend teleconference with [redacted] regarding request to lift stay to permit entry of summary judgment order and related action items (0.2); begin preparing description of invalidity and inequitable conduct claims (0.5).	.70	1250.00	875.00
1/22/25	EB	Review materials regarding status of claims and prepare draft invalidity and inequitable conduct claim description (0.8); correspond with BA, JS, and VO regarding same (0.2); correspond with [redacted] regarding reminder preservation notice (0.1).	1.10	1250.00	1,375.00
1/23/25	EB	Correspond with [redacted] regarding [redacted].	.20	1250.00	250.00
1/30/25	EB	Review and update Texas counsel regarding order lifting stay (0.1); draft meet and confer correspondence to opposing counsel (0.1); revise motion for entry of written summary judgment order (1.9); review and update client and co-counsel regarding correspondence from district court clerk and proposed response to same (0.2).	2.30	1250.00	2,875.00
1/31/25	EB	Evaluate response to correspondence from district court clerk (0.3); correspond with [redacted] and bankruptcy counsel regarding same (0.1); correspond with Texas counsel regarding correspondence to district court clerk regarding bankruptcy order (0.1).	.50	1250.00	625.00
		TOTAL PROFESSIONAL SERVICES			**$ 21,615.00**

Stris & Maher LLP

Invoice # 14471 February 21, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	11.90	1,250.00	14,875.00
Bridget Asay	BA	Partner	2.20	1,200.00	2,640.00
Ken Halpern	KJH	Partner	2.90	1,100.00	3,190.00
Andrew Atsalis	ASA	Fellow	2.60	350.00	910.00
Total			**19.60**		**$ 21,615.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
12/31/24		JND Discovery Invoice for December 2024.	3,765.00
		TOTAL EXPENSES ADVANCED	**$ 3,765.00**
		TOTAL THIS INVOICE	**$ 25,380.00**

Stris & Maher LLP

Invoice # 14471 February 21, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14251	11/01/24	855.00	684.00	171.00
14257	11/04/24	8,190.00	8,058.00	132.00
14283	11/14/24	4,755.00	4,557.00	198.00
14330	12/19/24	4,425.00	4,293.00	132.00
14380	1/13/25	8,990.00	7,192.00	1,798.00

Previous Balance	$ 2,431.00
Balance Due This Invoice	$ 25,380.00
TOTAL BALANCE DUE	**$ 27,811.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 1,798.00	$ 132.00	$ 501.00	$ .00	$ 2,431.00

Stris

February 21, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14459
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through January 31, 2025

RE: Whinstone Litigation

Total Professional Services	$ 634,762.50
Total Expenses Advanced	$ 205,268.47
TOTAL THIS INVOICE	**$ 840,030.97**
Previous Balance	$ 721,359.00
TOTAL BALANCE DUE	**$ 1,561,389.97**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Stris & Maher LLP

Invoice # 14459 February 21, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
1/02/25	EB	Attention to case management.	.30	1250.00	375.00
1/02/25	JS	Assign and advise Stris team regarding high priority phase two and damages case research issues.	1.30	1025.00	1,332.50
1/02/25	HM	Continue conducting research for affirmative damages case.	4.60	700.00	3,220.00
1/03/25	VO	Confer with PS, EB, and JS regarding Phase 2 strategy and planning.	.90	1025.00	922.50
1/03/25	PS	Teleconference with EB, JS, and VO regarding phase two strategy and planning.	.90	1450.00	1,305.00
1/03/25	EB	Review update from HM regarding [redacted] research (0.2); attend teleconference with PS, VO, and JS regarding phase 2 strategy and planning (0.9); confer with BA and JS regarding expert-related action items in support of phase 2 and affirmative damages claim (0.8); correspond with PB, HM, MV and litigation fellows regarding text messages for TT analysis (0.1); prepare correspondence to TT regarding upcoming project in support of phase 2 trial preparation (0.1).	2.10	1250.00	2,625.00
1/03/25	BA	Confer with JS and EB regarding expert-related action items (0.8); correspond with [redacted] (0.1).	.90	1200.00	1,080.00
1/03/25	JS	Call with EB and BA regarding expert action items on phase two and damages case (0.8); call with EB, PS, and VO regarding phase two strategy and planning (0.9); evaluate high priority expert action items in relation to damages case and phase two (2.4).	4.10	1025.00	4,202.50
1/03/25	HM	Continue drafting damages-phase document review memorandum (0.7).	.70	700.00	490.00
1/04/25	EB	Prepare for (0.1) and attend (0.3) teleconference with BA and [redacted] regarding analysis in support of phase 2 [redacted]; confer with BA regarding resulting action items and other damages expert analysis for phase 2 (0.3).	.70	1250.00	875.00
1/04/25	BA	Prepare for meeting with [redacted] to discuss potential further analysis of [redacted] (0.3); participate in teleconference with [redacted] and EB to discuss same (0.3); confer with EB regarding expert-related action items (0.3).	.90	1200.00	1,080.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/05/25	BA	Review correspondence from expert [redacted] and correspond with [redacted] and JS and EB regarding next steps.	.20	1200.00	240.00
1/06/25	EB	Prepare for (0.1) and attend (0.4) teleconference with CS regarding [redacted] outline; attend teleconference with SR regarding action items in support of [redacted] analysis and phase 2 testimony (0.3).	.80	1250.00	1,000.00
1/06/25	JS	Correspond with client regarding status and next steps for phase two of assumption litigation (0.4); evaluate and advance expert and research action items for phase two and damages case (3.0).	3.40	1025.00	3,485.00
1/06/25	SR	Confer with EB regarding action items relating to [redacted] phase 2 and damages case.	.30	750.00	225.00
1/06/25	CS	Teleconference with EB to discuss [redacted] deposition outline (0.4); review and analyze [redacted] expert report (2.7).	3.10	850.00	2,635.00
1/06/25	HM	Continue drafting document review memorandum for damages and phase 2.	2.10	700.00	1,470.00
1/07/25	EB	Attend teleconference with BA, JS, and PB regarding damages claim and phase 2 document review memorandum and next steps in support of review (0.3); correspond with TT regarding action items in support of damages and phase 2 text message review (0.2)	.50	1250.00	625.00
1/07/25	BA	Correspond and confer with litigation team and P. Tomasco regarding lack of response from Whinstone's counsel regarding phase 2 and correspond with M. Thomas regarding same and intent to seek status conference (0.8); draft emergency motion for status conference, correspond with litigation team and P. Tomasco regarding edits to same and finalization of same, and correspond with B. Howell regarding finalization and filing of same (2.7); review response from M. Thomas regarding phase 2 and analysis of same from JS (0.2); attend meeting with EB, JS, and PB to discuss strategy for preparation for upcoming trial proceedings (0.3).	4.00	1200.00	4,800.00
1/07/25	JS	Attend meeting with BA, EB, and PB to discuss strategy for preparation for upcoming trial proceedings (0.3); review and evaluate memorandum regarding review for damages case (0.3); move forward high priority action items for phase 2 and damages case (3.3).	3.90	1025.00	3,997.50

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Date	Tkpr	Description	Hours	Rate	Amount
1/07/25	SR	Begin reviewing materials to assist BA, EB, JS in [redacted] phase 2 and damages analysis.	6.10	750.00	4,575.00
1/07/25	CS	Review and analyze [redacted] reports in preparation for taking [redacted] deposition.	4.60	850.00	3,910.00
1/07/25	PB	Attend meeting with BA, EB, and JS to discuss strategy for preparation for upcoming trial proceedings.	.30	850.00	255.00
1/07/25	HM	Continue drafting damages-phase document review memorandum (2.2).	2.20	700.00	1,540.00
1/08/25	VO	Emails with client representatives and client's legal counsel regarding Whinstone objection to installation of miners (0.3); confer and correspond with JS and W. Thompson regarding same (1.1).	1.40	1025.00	1,435.00
1/08/25	EB	Review and correspond with BA, JS, PB, and HM regarding revisions to damages and phase 2 document review memorandum (0.7); prepare for (0.2) and attend (0.5) teleconference with TT regarding text message review and analysis in support of damages claim and phase 2; correspond with PB and HM regarding supporting action items (0.1).	1.50	1250.00	1,875.00
1/08/25	BA	Review correspondence between client and Whinstone regarding miner replacement and correspond with JS and litigation team regarding strategy for response to same (0.4); review draft review memorandum for damages phase and correspond with HM, EB, PB, and JS regarding strategy for and revisions to same (0.3); review draft notice of hearing and correspond with B. Howell regarding filing of same (0.1).	.80	1200.00	960.00
1/08/25	JS	Evaluate next steps and prepare correspondence and research regarding Whinstone refusal to cooperate with miner swap.	5.30	1025.00	5,432.50
1/08/25	SR	Continue reviewing materials to assist BA, EB, JS in [redacted] phase 2 and damages analysis.	6.50	750.00	4,875.00
1/08/25	CS	Continue reviewing and analyzing [redacted] reports and [redacted] report in preparation for [redacted] deposition.	6.30	850.00	5,355.00
1/08/25	PB	Review and revise draft memorandum regarding Phase 2 document analysis (1.2); teleconference with MV regarding Phase 2 preparation (0.2).	1.40	850.00	1,190.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/08/25	TT	Review materials including draft memorandum from HM to prepare for hot document assessment for damages and phase 2 (0.7); confer with EB regarding phase two litigation and affirmative damages in support of hot document assessment (0.5); prepare summary and analysis of [redacted] texts in support of same (6.0).	7.20	525.00	3,780.00
1/09/25	VO	Attend conference call with client representatives and client's legal counsel regarding miner installation dispute (0.8); emails with client and team regarding same (0.5).	1.30	1025.00	1,332.50
1/09/25	EB	Review initial summary and analysis from TT regarding text message review (0.5); advise TT regarding revisions to same (0.2); prepare for (0.4) and attend (1.0) teleconference with BA, JS, SR, and [redacted] regarding [redacted] in support of phase 2; review further information from [redacted] (0.1); correspond with BA, JS, and SR regarding same (0.1).	2.30	1250.00	2,875.00
1/09/25	BA	Correspond with litigation team and client regarding Whinstone's refusal to cooperate in replacement of miners and response to same (0.6); participate in teleconference with litigation team, bankruptcy counsel, and client team to address Whinstone's refusal to cooperate in replacement of miners (0.5); correspond further with J. Cohn, W. Thompson, and JS regarding email to Whinstone's counsel regarding same, correspond and confer with JS regarding same, and email Whinstone's counsel regarding same (0.5); begin drafting emergency motion seeking status conference to address Whinstone's refusal to cooperate in replacement of miners (2); participate in teleconference with [redacted], EB, SR, and JS to discuss analysis of [redacted] as relevant to phase 2 and to affirmative damages claim (1).	4.60	1200.00	5,520.00
1/09/25	JS	Prepare emergency motion regarding Whinstone actions in connection with miner swap (3.5); evaluate strategy and next steps in connection with same (3.4); attend teleconference with BA, SR, EB, and [redacted] regarding [redacted] in connection with phase 2 and damages (1.0).	7.90	1025.00	8,097.50
1/09/25	SR	Attend videoconference with [redacted], EB, BA, JS to discuss phase 2 and damages analysis (1); continue reviewing materials in connection with the same (5.5).	6.50	750.00	4,875.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/09/25	CS	Begin drafting outline for deposition of [redacted].	5.00	850.00	4,250.00
1/09/25	TT	Prepare summary and analysis of [redacted] texts in support of phase two litigation and affirmative damages hot document assessment (9.2)	9.20	525.00	4,830.00
1/10/25	VO	Emails with client and legal teams regarding new roadblocks from Whinstone regarding miner installation and Rhodium response to same (0.6); videoconference with client and legal teams regarding same (0.9).	1.50	1025.00	1,537.50
1/10/25	EB	Review and respond to team and client correspondence regarding status and high priority action items (0.1); attend teleconference with CS regarding [redacted] deposition [redacted] and [redacted] fact-gathering in support of same (0.1); attend teleconference with HM regarding discovery-related action items including revisions to review memorandum (0.1); begin reviewing and annotating materials in support of [redacted] damages and potential phase 2 analysis (1.0).	1.30	1250.00	1,625.00
1/10/25	BA	Correspond with [redacted] and P. Tomasco regarding deposition schedule (0.1); participate in teleconference with P. Tomasco, W. Thompson, J. Cohn, and JS to discuss preparation for status conference regarding phase 2 and issues related to miner replacement (1); participate in teleconference with A. Swartz, T. Disher, and [redacted] to discuss issues related to [redacted], correspond with litigation team regarding next steps with [redacted], and convey materials to A. Swartz related to same (0.6); correspond with litigation team and client team regarding Whinstone's refusal to cooperate with miner replacement and participate in teleconference with client team and litigation team regarding Whinstone's refusal to cooperate with miner replacement (1); correspond with JS and W. Thompson regarding Monday's status conference, review analysis of W. Thompson for same, correspond with JS, HM, and PB regarding analysis needed to prepare for same, and begin preparing for same (2).	4.70	1200.00	5,640.00
1/10/25	JS	Assist in preparation for status conference regarding phase 2 (5.3); attend teleconference with J. Cohn, W. Thompson, P. Tomasco, and BA regarding same (1.0).	6.30	1025.00	6,457.50
1/10/25	SR	Continue reviewing materials to assist BA, EB, JS in [redacted] phase 2 and damages analysis.	6.90	750.00	5,175.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/10/25	CS	Meet with EB to discuss progress on [redacted] deposition outline (0.1); review and analyze articles and papers [redacted] (1.0); continue drafting outline for [redacted] deposition (6.5).	7.60	850.00	6,460.00
1/10/25	PB	Draft analysis of invoices submitted by Whinstone in support of potential Phase 2 litigation.	1.20	850.00	1,020.00
1/10/25	HM	Continue drafting phase 2 and affirmative damages claim document review memorandum (4.4); teleconference with EB about document review memorandum (0.1); assist BA and JS with emergency status conference preparation (1.5).	6.00	700.00	4,200.00
1/10/25	TT	Continue preparing summary and analysis of [redacted] texts in support of phase two litigation and affirmative damages hot document assessment.	9.10	525.00	4,777.50
1/11/25	EB	Review correspondence and propose revised response to correspondence from Whinstone (0.1); correspond with JS regarding same (0.1); attend teleconferences with [redacted] (0.1) and [redacted] (0.2) regarding same and related action items; correspond with BA and JS regarding updating of document preservation notice (0.1).	.60	1250.00	750.00
1/11/25	BA	Prepare for hearing on scope of phase 2, including review of pleadings and evidence (2.9); review prior document hold letter and correspond with EB regarding [redacted] (0.1); correspond with P. Tomasco, W. Thompson, and JS regarding deposition dates (0.1).	3.10	1200.00	3,720.00
1/11/25	JS	Assist in preparation for status conference regarding Phase II issues.	2.20	1025.00	2,255.00
1/11/25	CS	Continue drafting outline for deposition of [redacted].	1.70	850.00	1,445.00
1/12/25	BA	Prepare for status conference, including research, outline and slide preparation, review of pleadings, and correspondence with JS and P. Tomasco (3.5); correspond with opposing counsel regarding deposition schedule (0.1).	3.60	1200.00	4,320.00
1/12/25	CS	Continue drafting outline for deposition of [redacted].	.90	850.00	765.00
1/12/25	PB	Draft analysis of invoices in preparation for status conference regarding Phase 2.	1.50	850.00	1,275.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/12/25	HM	Assist BA and JS with preparation for emergency status conference (0.4); continue drafting phase 2 and affirmative damages case document review memorandum (0.7).	1.10	700.00	770.00
1/12/25	TT	Continue preparing summary and analysis of [redacted] texts.	1.60	525.00	840.00
1/13/25	VO	Confer with JS and client legal counsel regarding [redacted] (0.2); emails with team and Rhodium regarding same (0.1); emails with JS and EB and confer with JS regarding analysis of [redacted] in connection with potential [redacted] (0.4).	.70	1025.00	717.50
1/13/25	EB	Correspond with [redacted], SR, and review and respond to team correspondence including TT, BA, JS, PB, and ASA regarding TT review of text messages (0.4); continue reviewing and annotating materials in support of [redacted], damages, and phase 2 analysis (1.5).	1.90	1250.00	2,375.00
1/13/25	BA	Prepare for and participate in status conference regarding scope of phase 2, including conferring with JS and corresponding with P. Tomasco regarding slide revisions (3.4); correspond with JS and team regarding follow up to status conference, and correspond with opposing counsel regarding same (0.2); correspond with JS and W. Thompson regarding proposed meet and confer, and correspond with [redacted], litigation team, and bankruptcy counsel regarding mediation [redacted] (0.2); review initial text message analysis and correspond with EB and JS regarding same (0.2).	4.00	1200.00	4,800.00
1/13/25	JS	Prepare for (0.3) and attend conference regarding phase II issues (0.5); confer with BA to prepare for same (0.5); evaluate and implement high priority action items in light of same (2.3); confer with CS regarding [redacted] deposition (0.2).	3.80	1025.00	3,895.00
1/13/25	CS	Listen to court hearing on need and subject of Phase II trial (0.7); meet with JS to discuss status of miner installation at Rockdale (0.2); review email communications related to the same (0.3); continue drafting outline for deposition of [redacted] (6.6).	7.80	850.00	6,630.00
1/13/25	PB	Attend hearing regarding schedule for trial phase two.	.50	850.00	425.00
1/13/25	HM	Continue drafting and revising phase 2 and affirmative damages case document review memorandum (1.5).	1.50	700.00	1,050.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/13/25	TT	Continue preparing summary and analysis of [redacted] texts.	8.50	525.00	4,462.50
1/14/25	EB	Review and respond to team correspondence and correspond with Stris team members regarding high priority action items (0.4); update TB regarding [redacted] analysis request in support of [redacted] (0.1); continue analyzing and annotating materials in support of [redacted] damages and phase analysis (1.2); attend teleconference with SR regarding same (0.2); review draft report from client (0.1); attend teleconference with clients, JS, co-counsel, and [redacted] regarding next steps in the wake of same (0.4); attend portion of checkpoint teleconference with BA, JS, clients and co-counsel (0.5).	2.90	1250.00	3,625.00
1/14/25	BA	Attend strategy call with litigation team, bankruptcy team, and client team (0.4); correspond with JS regarding [redacted] issue raised by client (0.1); correspond with bankruptcy counsel regarding discovery information for [redacted] and correspond with PB regarding responses to same (0.3).	.80	1200.00	960.00
1/14/25	JS	Attend teleconferences regarding [redacted] (0.4) and weekly touchpoint (0.5); evaluate next steps for phase 2 and potential mediation in light of status conference (0.5).	1.40	1025.00	1,435.00
1/14/25	SR	Continue reviewing and analyzing material and begin drafting [redacted] in support of [redacted], damages, and expert analysis (4.3); attend teleconference with EB regarding the same (0.2).	4.50	750.00	3,375.00
1/14/25	TB	Call with EB to discuss contract question regarding [redacted].	.10	1200.00	120.00
1/14/25	CS	Continue drafting outline for [redacted] deposition.	5.30	850.00	4,505.00
1/14/25	NC	Schedule meeting for EB & SR; correspond with EB regarding same.	.10	350.00	35.00
1/14/25	PB	Revise analysis of produced invoices.	.30	850.00	255.00
1/14/25	HM	Revise phase 2 and affirmative damages case document review memorandum (1.5).	1.50	700.00	1,050.00
1/14/25	TT	Continue preparing summary and analysis of [redacted] texts.	8.30	525.00	4,357.50

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Date	Tkpr	Description	Hours	Rate	Amount
1/15/25	PS	Teleconference with EB regarding strategy (0.3); prepare for upcoming strategy team calls (1.9).	2.20	1450.00	3,190.00
1/15/25	EB	Continue analyzing and annotating information in support of [redacted] phase 2 and damages claims (3.0); correspond with Stris team members regarding status and phase 2 action items (0.5); attend teleconference with PS regarding high priority action items and matter strategy (0.3).	3.80	1250.00	4,750.00
1/15/25	BA	Correspond and confer with PB and JS regarding Whinstone/Riot invoices (0.4); prepare for meet and confer with opposing counsel, confer with JS regarding same, and participate in meet and confer with opposing counsel (0.8); correspond with PB regarding invoice analysis and review further analysis of unpaid invoices, and correspond with JS regarding strategy for addressing invoices disputes with court (0.4).	1.60	1200.00	1,920.00
1/15/25	JS	Confer with BA to prepare for meet and confer regarding mediation and phase 2 (0.2); attend meet and confer with opposing counsel and [redacted] regarding mediation and phase 2 (0.5); evaluate strategic next steps in connection with [redacted] issues (1.0); evaluate legal issues surrounding Whinstone invoice claims and [redacted] argument (2.5).	4.20	1025.00	4,305.00
1/15/25	SR	Continue reviewing and analyzing material and drafting notes in support of [redacted] claims, damages, and expert analysis.	8.60	750.00	6,450.00
1/15/25	CS	Continue drafting outline for deposition of [redacted]; review and analyze data and documents relevant to the same.	7.60	850.00	6,460.00
1/15/25	CHH	Review and circulate attachments to produced [redacted] messages for document review efforts.	.30	350.00	105.00
1/15/25	PB	Teleconference with BA and JS regarding invoice analysis (0.6); correspondence with BA and JS regarding same (0.5).	1.10	850.00	935.00
1/15/25	HM	Review and respond to team correspondence regarding phase 2 and affirmative damages case document review memorandum (0.2).	.20	700.00	140.00
1/15/25	TT	Continue preparing summary and analysis of [redacted] texts.	10.00	525.00	5,250.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/16/25	VO	Confer with PS, EB, and JS regarding litigation planning and strategy.	.80	1025.00	820.00
1/16/25	PS	Continue to prepare for (1.3) and attend (0.9) team meeting regarding high priority phase 2 and damages-related action items; attend further strategy teleconference with EB, JS, and VO (0.8).	3.00	1450.00	4,350.00
1/16/25	EB	Continue analyzing and annotating materials in support of [redacted] of phase 2 and damages claim (2.4); advise NC regarding memorandum in support of same (0.1); correspond with Stris team and co-counsel regarding high priority action items including response to client inquiry and potential correspondence to Whinstone (0.4); review update from and advise TT regarding next steps in support of text message analysis (0.1); prepare for (0.5), attend and lead (0.9) Stris team meeting regarding high priority phase 2 and damages-related action items, and attend further strategy teleconference with PS, JS, and VO (0.8).	5.20	1250.00	6,500.00
1/16/25	BA	Review and analyze invoice data to prepare for phase 2 and assist client with resolving disputed invoices, correspond with JS regarding same, correspond with A. Peloubet to seek additional information, and review further analysis from A. Peloubet (1.9); attend teleconference with PS, EB, JS, CS, SR, CHH, JHA, and ASA regarding strategic and high-priority Phase 2 action items (0.5); begin outlining phase 2 scope arguments (0.5); correspond and confer with JS and W. Thompson regarding analysis of [redacted] to Whinstone for [redacted] (0.7); correspond with litigation team regarding client request for advice on [redacted] report (0.1).	3.70	1200.00	4,440.00
1/16/25	JS	Attend teleconference with PS, EB, BA, CS, SR, CHH, JHA, and ASA regarding strategic and high-priority Phase 2 action items (0.9); attend teleconference with VO, EB, and PS regarding strategic and high-priority Phase 2 action items (0.8).	1.70	1025.00	1,742.50
1/16/25	SR	Attend teleconference with PS, EB, BA, JS, CS, CHH, JHA, and ASA regarding strategic and high-priority Phase 2 action items (0.9); continue reviewing and analyzing material and drafting notes in support of [redacted] claims, damages, and expert analysis (6.4).	7.40	750.00	5,550.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/16/25	TB	Conduct legal research and analysis regarding [redacted] for EB and JS.	3.70	1200.00	4,440.00
1/16/25	CS	Participate in teleconference with PS, EB, JS, BA, CH, AA, and JHA regarding Phase 2 pressing action items (0.5); continue drafting outline for deposition of [redacted] (4.7).	5.20	850.00	4,420.00
1/16/25	CHH	Prepare invoice document review set for Phase II (0.5); attend teleconference with PS, EB, BA, JS, CS, SR, JHA, and ASA regarding strategic and high-priority Phase 2 action items (0.9).	1.40	350.00	490.00
1/16/25	NC	Update [redacted] memorandum with [redacted] .	.10	350.00	35.00
1/16/25	ASA	Attend teleconference with PS, EB, BA, JS, CS, SR, CHH, and JHA regarding strategic and high-priority Phase 2 action items.	.90	350.00	315.00
1/16/25	TT	Complete initial summary and analysis of [redacted] texts (2.0); repare summary and analysis of [redacted] texts in support of phase two and damages claims (8.9).	10.90	525.00	5,722.50
1/17/25	EB	Review update from TT and correspond with BA, JS, and ASA regarding additional text message analysis (0.2); attend teleconference with TT regarding next steps in support of same including review of embedded documents (0.4); continue analyzing and annotating materials in support of [redacted] of phase 2 and damages claim (2.2); advise NC regarding revisions to memorandum regarding same (0.1).	2.90	1250.00	3,625.00
1/17/25	BA	Continue analyzing disputed payment amounts, correspond with JS and with litigation and client team regarding same, and participate in teleconference with P. Tomasco, JS, and J. Cohn regarding strategy for same (1.9); review Whinstone's filing on scope of phase 2 and correspondence regarding water payments, correspond with JS regarding same, and continue analyzing and outlining arguments for response to Whinstone's scope filing (2).	3.90	1200.00	4,680.00
1/17/25	JS	Review and evaluate Whinstone scope filing and prepare preliminary outline of response.	3.50	1025.00	3,587.50
1/17/25	SR	Continue reviewing and analyzing material and drafting notes in support of [redacted] claims, damages, and expert analysis.	6.30	750.00	4,725.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/17/25	CS	Continue drafting outline for deposition of [redacted] (6.4); review and analyze Whinstone's statement on scope of phase 2 hearing (0.7).	7.10	850.00	6,035.00
1/17/25	NC	Prepare memorandum for EB regarding [redacted] phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	2.30	350.00	805.00
1/17/25	JH	Update bankruptcy docket.	2.00	350.00	700.00
1/17/25	TT	Conference call with EB regarding status and strategy going forward in support of phase two and affirmative damages hot document assessment (.4)	.40	525.00	210.00
1/17/25	TT	Revise summary and analysis of [redacted] texts to address additional information as directed by EB.	5.50	525.00	2,887.50
1/18/25	BA	Research and draft opposition to Whinstone's Phase 2 statement.	4.30	1200.00	5,160.00
1/18/25	SR	Continue reviewing and analyzing material and drafting notes in support of [redacted] claims, damages, and expert analysis.	6.50	750.00	4,875.00
1/18/25	TB	Continue [redacted] research.	3.10	1200.00	3,720.00
1/18/25	HM	Continue revising phase 2 and affirmative damages document review memorandum (1.4).	1.40	700.00	980.00
1/19/25	BA	Continue researching and drafting opposition to Whinstone's Phase 2 statement.	4.50	1200.00	5,400.00
1/19/25	TB	Continue [redacted] research and analysis regarding [redacted].	2.90	1200.00	3,480.00
1/19/25	HM	Revise phase 2 and affirmative damages case document review memorandum (3.8).	3.80	700.00	2,660.00
1/19/25	TT	Review and analyze embedded attachments from Rhodium texts regarding hot document assessment for phase two and affirmative damages.	8.60	525.00	4,515.00
1/20/25	EB	Revise phase 2 and damages document review memorandum (1.8); correspond with BA, JS, VO, PB, and HM regarding further revisions to and next steps in support of same and with TT regarding text review and analysis (0.5); continue annotating materials for [redacted] phase 2 and damages analysis (1.5).	3.80	1250.00	4,750.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/20/25	EB	Attend teleconference with CS [redacted] deposition regarding outline and preparation.	.20	1250.00	250.00
1/20/25	BA	Continue researching and drafting response to Whinstone's phase 2 scope filing and correspond and confer with JS regarding same (3.6); correspond with P. Tomasco and client team regarding payment disputes with Whinstone and phase 2 issues (0.3).	3.90	1200.00	4,680.00
1/20/25	JS	Prepare for and attend call with counsel and client teams regarding statement of scope (1.3); review and revise statement of scope (4.5); confer with BA regarding same (0.1).	5.90	1025.00	6,047.50
1/20/25	CS	Call with EB to discuss status of [redacted] deposition outline (0.2); continue drafting outline for deposition of [redacted] (7.2)	7.40	850.00	6,290.00
1/20/25	PB	Teleconference with BA and JS regarding brief on scope of Phase 2.	1.00	850.00	850.00
1/20/25	HM	Revise phase 2 and affirmative damages review memorandum (0.7).	.70	700.00	490.00
1/20/25	TT	Continue reviewing and analyzing embedded attachments as requested by EB.	5.60	525.00	2,940.00
1/21/25	EB	Correspond with Stris team regarding high priority action items including final revisions to phase 2 review memorandum (0.2); attend teleconference with BA, JS, PB, and HM regarding action items including same (0.8); prepare for (0.2) and attend (0.3) teleconference with [redacted] regarding action items including [redacted] notice; continue annotating materials for [redacted] phase 2 and damages memorandum (1.5); review draft memorandum and advise NC regarding revisions to same (0.3); attend portion of checkpoint teleconference with clients and co-counsel (0.5).	3.80	1250.00	4,750.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/21/25	BA	Continue researching and drafting response to Whinstone's Phase 2 statement, correspond with litigation team and with JS, HM, and PB regarding strategy for same, and review and incorporate revisions from bankruptcy counsel for same (4.2); participate in teleconference with bankruptcy counsel, client, and litigation team (.5); review draft document review memorandum for affirmative damages phase, convey edits on some to EB and HM, and participate in teleconference with EB, HM, JS, and PB to discuss revisions to same and finalize tagging decisions (0.8).	5.50	1200.00	6,600.00
1/21/25	JS	Assist in preparation of Statement of Scope (2.4); attend portion of weekly touch-point call with client and outside counsel teams (0.5); attend teleconference with BA, EB, HM, and PB regarding damages phase document review memorandum (0.8).	3.70	1025.00	3,792.50
1/21/25	SR	Continue reviewing and analyzing material and drafting notes in support of [redacted] claims, damages, and expert analysis.	3.50	750.00	2,625.00
1/21/25	TB	Continue [redacted] research and analysis.	3.80	1200.00	4,560.00
1/21/25	CS	Continue drafting outline for deposition of [redacted].	8.10	850.00	6,885.00
1/21/25	CHH	Review BA email and collect documents for Phase II preparations accordingly (0.3); review and analyze Quinn Emanuel [redacted] request (0.2); confer with PB regarding same (0.1); work on same (4.0).	4.60	350.00	1,610.00
1/21/25	NC	Continue preparing memorandum for EB regarding [redacted] phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.50	350.00	525.00
1/21/25	JH	Update bankruptcy docket (0.5); review materials from HM to prepare for phase 2 and damages case document review (1.0).	1.50	350.00	525.00
1/21/25	PB	Teleconference with BA, JS, EB, and HM regarding strategy for Phase 2 preparation and follow-up call with HM regarding same (1.0); call with BA regarding brief on scope of Phase 2 (0.3); call with CH regarding response to SAFE request (0.2).	1.50	850.00	1,275.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/21/25	HM	Teleconference with EB, PB, JS, and BA regarding phase 2 and affirmative damages document review memorandum (0.8); confer with PB about document review management (0.2); revise phase 2 and affirmative damages document review memorandum (3.3); assist BA with upcoming filing on scope of phase 2 (0.4).	4.70	700.00	3,290.00
1/21/25	TT	Continue reviewing and analyzing embedded attachments.	6.90	525.00	3,622.50
1/22/25	EB	Revise and advise CS regarding revisions to [redacted] deposition outline (3.5); correspond with BA, JS, and NC regarding [redacted] notice (0.1); attend teleconference with PB, HM, TT, ASA, CHH, JHA, and SB regarding phase 2 document review instructions (1.0); correspond with [redacted] regarding [redacted] notice (0.2); attention to case management (0.3); review and respond to team correspondence regarding high priority action items including response to [redacted] inquiries (0.5).	5.60	1250.00	7,000.00
1/22/25	BA	Continue researching, reviewing, and drafting response to Whinstone's phase 2 statement, correspond with litigation and bankruptcy counsel regarding revisions to same, correspond and confer with PS and JS regarding invoice analysis and related strategy for same, review and revise supporting materials and declaration for same, and correspond with JS, PB, HM, SB, and CH and B. Howell as necessary regarding finalization and filing of same (5.2); correspond with [redacted] and P. Tomasco regarding [redacted], correspond with EB regarding client request for assistance with [redacted], and correspond with JS and EB regarding updating [redacted] notice (0.2); correspond with CH and with bankruptcy counsel regarding document search requests from SAFE holders (0.2); correspond with EB and VO regarding request from [redacted] for expert reports and correspond with EB regarding Midas Green counterclaim description for bankruptcy schedules (0.2).	5.80	1200.00	6,960.00
1/22/25	JS	Assist in finalizing Statement of Scope.	3.00	1025.00	3,075.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/22/25	SB	Attend teleconference with EB, PB, HM, TT, ASA, CHH and JHA regarding phase 2 document review instructions (1.0); create Asay declaration iso Debtors' scope statement (1.8); create exhibits iso Debtors' scope statement (1.0).	3.80	350.00	1,330.00
1/22/25	CS	Continue drafting outline for deposition of [redacted].	6.10	850.00	5,185.00
1/22/25	CHH	Prepare discovery database for phase 2 document review (0.1); attend teleconference with EB, PB, HM, TT, ASA, JHA, and SB regarding phase 2 document review instructions (1.0); teleconference with [redacted] regarding proximity searching (0.3); continue running search term reports for Quinn (3.5); [redacted] issues with same in email memorandum to BA and JS (0.1); cite-check and proofread Debtors' response and counter-statement on the scope of phase 2 (3.2).	8.20	350.00	2,870.00
1/22/25	NC	Continue preparing memorandum for EB regarding [redacted] phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.20	350.00	420.00
1/22/25	JH	Attend teleconference with EB, PB, HM, TT, ASA, CHH and SB regarding phase 2 document review instructions (1.0); review first assigned batch of documents for Phase 2 issues (6.0).	7.00	350.00	2,450.00
1/22/25	PB	Attend teleconference with EB, HM, TT, ASA, CHH< JHA, and SB regarding Phase 2 document review instructions (1.0); prepare analysis to support brief regarding Phase 2 scope (2.2); teleconferences with BA and JS regarding same (0.8); call with CH regarding response to discovery requests (0.1).	4.10	850.00	3,485.00
1/22/25	ASA	Attend teleconference with EB, PB, HM, TT, CHH, JHA, and SB regarding phase 2 document review instructions (1.0); review and analyze materials from HM to prepare for phase 2 document review (1.0); begin Phase 2 document review (0.7).	2.70	350.00	945.00
1/22/25	HM	Attend teleconference with EB, PB, HM, TT, ASA, CHH, JHA, and SB regarding phase 2 document review instructions (1.0); assist BA with scope filing (1.0); perform tasks related to document review, including [redacted] batch completion and drafting correspondence to reviewers (0.6).	2.60	700.00	1,820.00
1/22/25	TT	Attend teleconference with EB, PB, HM, TT, ASA, CHH, JHA, and SB regarding phase 2 document review instructions (1.0).	1.00	525.00	525.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/22/25	TT	Continue reviewing and analyzing embedded text attachments.	7.80	525.00	4,095.00
1/23/25	PS	Prepare for (1.0) and attend (1.1) teleconference with EB, BA, JS, CS, PB, HM, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items.	2.10	1450.00	3,045.00
1/23/25	EB	Confer with BA regarding action items including response to credits analysis inquiry (0.2); correspond with P. Tomasco and R. Izakelian regarding same (0.3); review and advise NC regarding revisions to [redacted] memorandum (0.2); continue reviewing and annotating materials in support of same (2.5); attend initial daily checkpoint phase 2 document review teleconference to assess progress, address questions, and advise regarding revisions to review memoranda and protocol (0.2); prepare for (0.5) and attend (1.1) teleconference with PS, EB, BA, JS, CS, PB, HM, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority phase 2 action items; review comments and questions from CS (0.2) and attend teleconference with CS regarding revisions to [redacted] deposition outline (0.3); provide materials to CS in support of same (0.1); correspond with co-counsel and [redacted] regarding [redacted] and TB regarding review and analysis of materials in support of mediation (0.2).	5.80	1250.00	7,250.00
1/23/25	BA	Attend teleconference with PS, EB, JS, CS, PB, HM, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items (1); correspond with JS regarding upcoming status conference on Phase 2 scope, correspond with P. Tomasco regarding same, and begin preparing for argument at same (1.2); review updates from CH regarding issues with Logikcull searches requested by bankruptcy counsel (0.2).	2.40	1200.00	2,880.00
1/23/25	JS	Attend teleconference with PS, EB, BA, CS, PB, HM, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items (1.1); review and evaluate strategic questions posed by [redacted] in connection with Phase 2 and damages case strategy (0.7); confer with [redacted] regarding same (0.1).	1.90	1025.00	1,947.50
1/23/25	SR	Attend portion of teleconference with PS, EB, BA, JS, CS, PB, HM, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items.	1.00	750.00	750.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/23/25	SB	Attend teleconference with PS, EB, BA, JS, CS, PB, HM, SR, CHH, MV, JHA, and ASA regarding strategic and high-priority Phase 2 action items (1.1); attend daily checkpoint teleconference regarding phase 2 document review. (0.2); conduct Phase 2 document review (3.7).	5.00	350.00	1,750.00
1/23/25	CS	Meet with EB regarding status of outline for deposition of [redacted] (0.3); attend teleconference with PS, EB, BA, JS, PB, HM, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items (1.1); continue drafting outline for deposition of [redacted] (5.8)	7.20	850.00	6,120.00
1/23/25	CHH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); prepare discovery database for same (0.1); attend teleconference with PS, EB, BA, JS, CS, PB, HM, SR, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items (1.1); collect and prepare background documents regarding [redacted] for team to review (0.3); confer with [redacted] regarding proximity searching issues (0.1); test run various searches with proposed solution to same (0.2); email memorandum to BA regarding same (0.1); review and analyze materials from HM to prepare for phase 2 document review (1.0); review first assigned phase 2 document review batch (1.5).	4.60	350.00	1,610.00
1/23/25	NC	Continue preparing memorandum for EB regarding [redacted] of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.80	350.00	630.00
1/23/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review second assigned batch of documents for Phase 2 issues (5.0).	5.20	350.00	1,820.00
1/23/25	PB	Attend teleconference with PS, EB, BA, JS, CS, HM, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items.	1.10	850.00	935.00
1/23/25	ASA	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); circulate requested deposition transcript at request of EB (0.2); review assigned batch of Phase 2 documents (3.0); attend teleconference with PS, EB, BA, JS, CS, PB, HM, SR, MV, SB, JHA, and CHH regarding strategic and high-priority Phase 2 action items (1.1).	4.50	350.00	1,575.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/23/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); attend teleconference with PS, EB, BA, JS, CS, PB, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items (1.1); perform quality check of document review (0.5); draft phase 2 task list (0.3).	2.10	700.00	1,470.00
1/23/25	TT	Review and analyze revised memorandum from HM and Order of U.S. Bankruptcy Court in preparation for phase 2 and affirmative damages review.	1.20	525.00	630.00
1/23/25	MV	Attend teleconference with PS, EB, BA, JS, CS, PB, HM, SR, CHH, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items.	1.10	425.00	467.50
1/24/25	EB	Provide further feedback to CS regarding revisions to [redacted] deposition outline (0.5); review and respond to team and co-counsel correspondence regarding high priority action items (0.5); review and comment on draft complaint (2.0); continue annotating [redacted] phase 1 materials in support of phase 2 and damages claims (1.1).	4.10	1250.00	5,125.00
1/24/25	BA	Prepare for status conference/hearing on scope of phase 2, including conferring with P. Tomasco, W. Thompson, J. Cohn, and JS (4.3); participate in status conference/hearing on scope of phase 2 (1); confer with [redacted] and [redacted] following hearing (0.2); confer with JS regarding follow up from hearing (0.1); correspond with litigation and bankruptcy counsel regarding ongoing issues with [redacted] (0.1).	5.60	1200.00	6,720.00
1/24/25	JS	Attend portion of teleconference with outside counsel teams to prepare for hearing on scope of Phase 2 (0.6); attend teleconferences with BA to prepare for (0.8) and debrief from (0.1) hearing on scope of Phase 2; attend hearing on Phase 2 (0.9); begin reviewing and evaluating damages complaint (1.0).	3.40	1025.00	3,485.00
1/24/25	TB	Update [redacted] research and analysis based on review of additional [redacted] materials.	4.50	1200.00	5,400.00
1/24/25	CS	Continue drafting outline for deposition of [redacted] (6.1); review hearing on phase two trial issues (1).	7.10	850.00	6,035.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/24/25	CHH	Review first assigned phase 2 document review batch (1.5); attend daily checkpoint teleconference regarding phase 2 document review (0.3); review second assigned phase 2 document review batch (2.0); review third assigned phase 2 document review batch (0.5).	4.30	350.00	1,505.00
1/24/25	NC	Continue preparing memorandum for EB regarding [redacted] of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	5.30	350.00	1,855.00
1/24/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review third assigned batch of documents for Phase 2 issues (6.0).	6.30	350.00	2,205.00
1/24/25	PB	Attend daily team meeting regarding document preparation for Phase 2 hearing (0.3); attend portion of hearing regarding scope of Phase 2 (0.5).	.80	850.00	680.00
1/24/25	ASA	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); update running matter status memorandum (0.2); review assigned batch of Phase 2 documents (5.0)	5.50	350.00	1,925.00
1/24/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review and respond to team correspondence regarding phase 2 document review (0.6).	.90	700.00	630.00
1/24/25	SD	Prepare and organize documents for BA's hearing in U.S. Bankruptcy Court, Southern Dist. of Texas (0.9).	.90	350.00	315.00
1/25/25	BA	Review correspondence from W. Thompson regarding miner installations and correspond with [redacted] regarding same (0.1); begin reviewing draft affirmative complaint (0.9).	1.00	1200.00	1,200.00
1/25/25	JS	Review and evaluate draft damages phase complaint.	1.50	1025.00	1,537.50
1/25/25	TB	Continue updating [redacted] analysis based upon additional [redacted] litigation documents.	1.20	1200.00	1,440.00
1/25/25	CS	Continue drafting outline for deposition of [redacted].	2.00	850.00	1,700.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/26/25	EB	Continue reviewing and commenting on draft complaint including responding to comments from BA (0.6); continue reviewing and annotating materials in support of [redacted] phase 2 and damages claims (2.0); correspond with NC regarding next steps in support of memorandum regarding same (0.1).	2.70	1250.00	3,375.00
1/26/25	BA	Correspond with EB and JS regarding draft complaint and review additional comments from EB on same.	.20	1200.00	240.00
1/26/25	JS	Further review and revise draft damages phase complaint.	1.00	1025.00	1,025.00
1/26/25	CS	Continue revising outline for deposition of [redacted].	3.10	850.00	2,635.00
1/27/25	EB	Correspond with BA, JS, HM, MV, and litigation assistants regarding high priority action items in support of phase 2 (0.5); continue reviewing and annotating [redacted] phase 1 materials (3.0); review and begin further revising revised [redacted] deposition outline from CS (2.1); review update from and advise TT regarding next steps in support of text analysis (0.3); confer with and provide documents to A. Swartz in support of revisions to draft complaint (0.3).	6.20	1250.00	7,750.00
1/27/25	BA	Correspond with JS and EB regarding high priority action items for both phase 2 and affirmative case, correspond with HM regarding text message storage by Setec, and review client update regarding miner installation (0.4).	.40	1200.00	480.00
1/27/25	JS	Attend teleconferences with [redacted] and [redacted] (1.3); further review damages phase complaint (0.5); evaluate high priority action items in connection with Phase 2 and damages case (1.1).	2.90	1025.00	2,972.50
1/27/25	SR	Continue reviewing and analyzing material and drafting notes in support of [redacted] claims, damages, and expert analysis.	1.00	750.00	750.00
1/27/25	SB	Attend portion of daily checkpoint teleconference regarding phase 2 document review. (0.1); conduct Phase 2 document review (2.9).	3.00	350.00	1,050.00
1/27/25	NC	Continue preparing memorandum for EB regarding [redacted] of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.50	350.00	525.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/27/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review fourth assigned batch of documents for Phase 2 issues (4.0).	4.20	350.00	1,470.00
1/27/25	ASA	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review assigned batch of Phase 2 documents (3.8).	4.00	350.00	1,400.00
1/27/25	HM	Perform quality check of phase 2 document review (0.1); update document review memorandum (0.3); attend daily checkpoint teleconference regarding phase 2 document review (0.1); confer with [redacted] Setec regarding storage of cell phone images (0.3); draft correspondence to BA, JS, and PB regarding storage of cell phone images (0.3).	1.10	700.00	770.00
1/27/25	TT	Revise summary and analysis of [redacted] texts to address additional information as directed by EB.	5.10	525.00	2,677.50
1/27/25	MV	Assist with syntax and search parameters for phase 2 review (0.8); begin preparing phase 2 exhibits and exhibit list (1.2); create targeted searches and provide results for attorney review (0.5).	2.50	425.00	1,062.50
1/28/25	EB	Correspond with NC regarding [redacted] memorandum (0.1); continue annotating materials for same (1.9); prepare for (0.6) and attend (1.0) teleconference with BA, JS, and SR regarding action items in support of [redacted] analysis; review and respond to team correspondence and correspondence with co-counsel regarding high priority action items including revisions to draft complaint (0.4); correspond with [redacted] regarding analysis and action items (0.1); prepare for (0.2) and attend portion of (1.1) teleconference with clients and co-counsel.	5.40	1250.00	6,750.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/28/25	BA	Review, research, and analyze proposed slides for financing process as related to damages claims, correspond with JS and EB regarding same, and correspond with litigation team and client team regarding same (0.8); participate in teleconference with SR, JS, and EB to analyze and strategize for work of [redacted] expert [redacted] (1); review and analyze revised draft of amended complaint, correspond with litigation team regarding same, and research issues for same (0.8); participate in teleconference with client team, litigation team, and bankruptcy counsel (1.1); review revisions to draft affirmative complaint and convey edits on same to JS and EB (0.4); analyze research on [redacted] issues as relevant to [redacted] [redacted] complaint (0.3).	4.40	1200.00	5,280.00
1/28/25	JS	Attend client touch point call (0.7); attend portion of teleconference with SR, EB, and BA regarding [redacted] issues in connection with damages phase (0.5); evaluate [redacted] [redacted] slides in connection with [redacted] issues (0.6); review and evaluate revised complaint (0.5).	2.30	1025.00	2,357.50
1/28/25	SR	Continue reviewing and analyzing material and drafting notes in support of [redacted] claims, damages, and expert analysis (4.8); attend teleconference with EB, BA, and JS to discuss action items and strategy relating to the same (1); review and analyze damages-related calculations top assist EB, JS, and BA in preparation for client call regarding the same (1.7).	7.40	750.00	5,550.00
1/28/25	SB	Attend portion of daily checkpoint teleconference regarding phase 2 document review. (0.1); conduct Phase 2 document review (3.9).	4.00	350.00	1,400.00
1/28/25	CHH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); teleconference with MV regarding various targeted searches in support of phase 2 discovery (0.3); generate same (0.1); review and analyze documents regarding [redacted] issue (0.7); email memorandum to EB regarding same (0.1); review third assigned phase 2 document review batch (1.0).	2.40	350.00	840.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/28/25	NC	Continue preparing memorandum for EB regarding [redacted] of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.70	350.00	595.00
1/28/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review fifth assigned batch of documents for Phase 2 issues (5.0).	5.20	350.00	1,820.00
1/28/25	ASA	Assist EB with access to spreadsheets provided by [redacted] (0.3); update [redacted] memorandum (0.2); attend daily checkpoint teleconference regarding phase 2 document review (0.2): continue review of Phase 2 documents [redacted] (2.8).	3.50	350.00	1,225.00
1/28/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); perform quality check of phase 2 document review (0.9); correspond with EB about progress of document review (0.5).	1.60	700.00	1,120.00
1/28/25	TT	Continue revising summary and analysis of [redacted] texts(2.1); revise summary and analysis of [redacted] (0.8) and [redacted] (2.5) texts in support of phase 2 litigation and affirmative damages claims.	5.40	525.00	2,835.00
1/28/25	MV	Attend teleconference with CH regarding search parameters and syntax set-up for phase 2 targeted searches (0.3); review documents from targeted document searches, create and revise additional searches, and update HM and team regarding same (1.9).	2.20	425.00	935.00
1/29/25	EB	Review revised slide deck and draft complaint to assist with further revisions (1.4); attend teleconference with JS and co-counsel regarding revisions to and action items in support of latter (0.6); review additional materials from [redacted] in support of same and to prepare for upcoming teleconference (0.2); attend teleconference with BA, SR, and [redacted] regarding related analysis (1.0); correspond with BA, JS, and SR regarding resulting action items (0.1).	3.30	1250.00	4,125.00
1/29/25	BA	Participate in teleconference with [redacted], EB, and SR to discuss action items and analysis related to damages calculations.	1.00	1200.00	1,200.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/29/25	JS	Attend teleconference with EB and co-counsel regarding revisions and action items in connection with slide deck draft (0.6); review and revise same and draft complaint (0.9); evaluate motion to [redacted] and related issues (1.5)	3.00	1025.00	3,075.00
1/29/25	SR	Attend videoconference with [redacted], EB, BA to discuss [redacted] and damages-related expert analysis (1); review and analyze correspondence from [redacted] regarding the same (1); continue analyzing material and drafting notes in support of [redacted], damages, and expert analysis (5.5).	7.50	750.00	5,625.00
1/29/25	SB	Attend portion of daily checkpoint teleconference regarding phase 2 document review. (0.2); conduct Phase 2 document review (4.0).	4.20	350.00	1,470.00
1/29/25	CHH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); targeted searching and review and analysis of documents for same (0.5); emails to EB and HM regarding same (0.1); review fourth assigned phase 2 document review batch (2.5); review fifth assigned phase 2 document review batch (1.4).	4.80	350.00	1,680.00
1/29/25	NC	Continue preparing memorandum for EB regarding [redacted] of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.60	350.00	560.00
1/29/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); update bankruptcy docket (0.5); review sixth assigned batch of documents for Phase 2 issues (4.0).	4.80	350.00	1,680.00
1/29/25	ASA	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); continue review of assigned Phase 2 documents [redacted] (3.4); update [redacted] memorandum at request of EB (0.3).	4.00	350.00	1,400.00
1/29/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); update document review memorandum (0.2); review and respond to team correspondence regarding document review (1.5); attention to organization of internal matter files (0.5).	2.50	700.00	1,750.00
1/29/25	TT	Continue analyzing embedded attachments.	1.70	525.00	892.50

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Date	Tkpr	Description	Hours	Rate	Amount
1/29/25	MV	Assist with further targeted searches for attorney review.	2.50	425.00	1,062.50
1/30/25	PS	Prepare for (0.5) and attend (0.3) team teleconference regarding high priority action items.	.80	1450.00	1,160.00
1/30/25	EB	Continue analyzing and corresponding with BA, JS, SR, C. [redacted] and co-counsel regarding information in support of [redacted] analysis (1.5); attend portion of Stris team teleconference regarding high priority action items (0.2); attend teleconference with JS, client, and co-counsel regarding [redacted] expert (0.5).	2.20	1250.00	2,750.00
1/30/25	BA	Continue reviewing and analyzing adversary complaint, including edits and comments on same from client team and bankruptcy team, and correspond with A. Swartz and team regarding same (1.7); participate in teleconference with litigation team, bankruptcy counsel, and client team regarding [redacted] to Whinstone (0.6); attend teleconference with PB, HM, PS, EB, CHH, ASA, and JHA to discuss strategic and high-priority Phase 2 action items (0.3); confer with EB regarding proposed [redacted] expert [redacted] (0.1); confer with JS regarding case status and correspond with J. Cohn and team regarding water bill invoices (0.2); continue analyzing research on issues related to [redacted] for damages claims (0.3).	3.20	1200.00	3,840.00
1/30/25	JS	Further review and evaluate complaint in connection with water issues (1.1); attend client call regarding [redacted] issues (0.6); attend call with [redacted] regarding Whinstone litigation issues (1.1).	2.80	1025.00	2,870.00
1/30/25	SB	Conduct Phase 2 document review (3.2).	3.20	350.00	1,120.00
1/30/25	CHH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review fifth assigned phase 2 document review batch (1.0); review sixth assigned phase 2 review batch (2.0); review seventh assigned phase 2 review batch (2.0); attend teleconference with BA, PB, HM, PS, EB, ASA, and JHA to discuss strategic and high-priority Phase 2 action items (0.3).	5.60	350.00	1,960.00

Invoice # 14459 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/30/25	NC	Continue preparing memorandum for EB regarding [redacted] of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	2.20	350.00	770.00
1/30/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); update bankruptcy docket (0.1); review seventh assigned batch of documents for Phase 2 issues (4.0).	4.40	350.00	1,540.00
1/30/25	PB	Attend teleconference with BA, PB, HM, PS, EB, CHH, ASA, and JHA to discuss strategic and high-priority Phase 2 action items.	.30	850.00	255.00
1/30/25	ASA	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); attend teleconference with BA, PB, HM, PS, EB, CHH, and JHA to discuss strategic and high-priority Phase 2 action items (0.3); provide ShareFile link for [redacted] and download updated spreadsheet (0.1); update [redacted] memorandum (0.2); continue review of assigned Phase 2 documents (5.1).	6.00	350.00	2,100.00
1/30/25	HM	Attend teleconference with BA, PB, PS, EB, CHH, ASA, and JHA to discuss strategic and high-priority Phase 2 action items (0.3); attend daily checkpoint teleconference regarding phase 2 document review (0.3); review and respond to team correspondence regarding task list and document review (0.7).	1.30	700.00	910.00
1/30/25	MV	Attend teleconference with PS, EB, BA, JS, CS, PB, HM, SR, CHH, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items.	.30	425.00	127.50
1/31/25	EB	Correspond with BA, HM, MV, TT, and CH regarding status and action items in support of document review, qc, and exhibit list (0.5); correspond with JS and co-counsel regarding material and action items in support of revisions to draft complaint (0.6); advise NC regarding next steps in support of memorandum (0.1); revise [redacted] deposition outline (1.7).	2.90	1250.00	3,625.00

Stris & Maher LLP

Invoice # 14459 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/31/25	BA	Review and analyze new NDA agreement required by Whinstone for employees, correspond with CH to request document comparison, correspond with client regarding same, and correspond with J. Cohn, W. Thompson, P. Tomasco, and JS regarding analysis of same and [redacted] (1.8); participate in teleconference with client team, P. Tomasco, and A. Swartz regarding [redacted] consultant (0.5); correspond with P. Tomasco and litigation team regarding next steps for [redacted] consultant, and potential further production of documents for [redacted] (0.3); correspond with J. Cohn and JS regarding water invoices, request history of same from [redacted], and review same as relevant to phase 2, and correspond with HM, MV, and CH regarding use of same as phase 2 exhibits (0.5); review correspondence from [redacted] regarding potential mediation and correspond with P. Tomasco and team regarding same (0.2); correspond with HM, EB, and CH regarding document review updates and potential phase 2 exhibits (0.2); correspond with HM regarding [redacted] data storage (0.1); review Whinstone's reply regarding scope of phase 2 and correspond with P. Tomasco regarding potential response to same (0.4).	3.90	1200.00	4,680.00
1/31/25	CHH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review eighth assigned phase 2 document review batch (2.0); review ninth assigned phase 2 review batch (2.0); targeted searching and analysis of [redacted] issues (0.5).	4.70	350.00	1,645.00
1/31/25	NC	Continue preparing memorandum for EB regarding [redacted] of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	6.10	350.00	2,135.00
1/31/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); update bankruptcy docket (0.2); review eighth assigned batch of documents for Phase 2 issues (5.0).	5.50	350.00	1,925.00
1/31/25	ASA	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); continue review of assigned Phase 2 documents (5.0).	5.30	350.00	1,855.00

Invoice # 14459 February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/31/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); confer with TT regarding phase 2 document review (1.1); perform quality check of document review (1.2); amend review memorandum (0.5); review and respond to team correspondence regarding document review and other targeted document searches (1.6).	4.70	700.00	3,290.00
1/31/25	TT	Review and analyze additional materials in support of phase 2 document review (0.4); confer with HM regarding phase 2 document review (1.1).	1.50	525.00	787.50
1/31/25	MV	Continue working on Phase 2 exhibits and exhibit list.	1.00	425.00	425.00
		TOTAL PROFESSIONAL SERVICES			**$ 634,762.50**

Stris & Maher LLP

Invoice # 14459 February 21, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	9.00	1,450.00	13,050.00
Elizabeth Brannen	EB	Partner	72.80	1,250.00	91,000.00
Bridget Asay	BA	Partner	82.90	1,200.00	99,480.00
Tillman Breckenridge	TB	Partner	19.30	1,200.00	23,160.00
Victor O'Connell	VO	Partner	6.60	1,025.00	6,765.00
John Stokes	JS	Partner	80.40	1,025.00	82,410.00
Colleen Smith	CS	Associate	103.20	850.00	87,720.00
Peter Brody	PB	Associate	15.10	850.00	12,835.00
Sarah Rahimi	SR	Associate	80.00	750.00	60,000.00
Helen Marsh	HM	Associate	47.30	700.00	33,110.00
Tanya Tice	TT	Discovery Associate	115.50	525.00	60,637.50
Monica Viramontes	MV	Sr Paralegal	9.60	425.00	4,080.00
Andrew Atsalis	ASA	Fellow	36.40	350.00	12,740.00
Cynthia Huang	CHH	Fellow	40.90	350.00	14,315.00
Sebastian Delgado	SD	Fellow	.90	350.00	315.00
Shayra Banta	SB	Fellow	23.20	350.00	8,120.00
Nicholas Capalbo	NC	Fellow	25.40	350.00	8,890.00
Jaida Hodge-Adams	JH	Fellow	46.10	350.00	16,135.00
Total			**814.60**		**$ 634,762.50**

Stris & Maher LLP

Invoice # 14459 February 21, 2025

EXPENSES ADVANCED

Date	Task	Description	Amount
11/30/24		Printing for the Rhodium trial in Houston.	6,687.77
12/05/24		Local Travel - The Lancaster Hotel - lodging for Houston Depositions.	30,919.21
12/19/24		Local Travel - Vendor fee for research documents.	116.49
12/27/24		Local Travel - Newswire press release service fee.	349.00
12/31/24		Litigation Support Vendors	2,550.00
1/01/25		Logikcull EDiscovery SaaS subscription.	2,646.00
2/11/25		Stone turn - Balance of professional services rendered.	162,000.00
		TOTAL EXPENSES ADVANCED	**$ 205,268.47**
		TOTAL THIS INVOICE	**$ 840,030.97**

Invoice # 14459 February 21, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14249	11/01/24	79,868.00	63,894.40	15,973.60
14263	11/04/24	1,139,238.00	918,737.10	220,500.90
14269	11/14/24	1,632,686.25	1,329,529.25	303,157.00
14317	12/19/24	1,183,151.62	1,022,299.12	160,852.50
14366	1/13/25	132,202.25	111,327.25	20,875.00
		Previous Balance		$ 721,359.00
		Balance Due This Invoice		$ 840,030.97
		TOTAL BALANCE DUE		**$ 1,561,389.97**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 20,875.00	$ 160,852.50	$ 539,631.50	$ .00	$ 721,359.00

Stris

February 21, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14472
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through January 31, 2025

RE: Retention and Fee Applications

Total Professional Services	$ 8,575.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 8,575.00**
Previous Balance	$ 22,525.00
TOTAL BALANCE DUE	**$ 31,100.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14472 February 21, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
1/09/25	EB	Begin working on December fee statement.	1.40	1250.00	1,750.00
1/10/25	EB	Continue working on December fee statement.	2.60	1250.00	3,250.00
1/10/25	NC	Assist EB with portions of December fee statement.	1.80	350.00	630.00
1/13/25	EB	Continue preparing portions of December fee statement.	1.00	1250.00	1,250.00
1/14/25	EB	Correspond with NC regarding (0.1) and continue preparing portions of December fee statement (0.6).	.70	1250.00	875.00
1/20/25	VO	Work on December fee application.	.80	1025.00	820.00
		TOTAL PROFESSIONAL SERVICES			**$ 8,575.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	5.70	1,250.00	7,125.00
Victor O'Connell	VO	Partner	.80	1,025.00	820.00
Nicholas Capalbo	NC	Fellow	1.80	350.00	630.00
Total			**8.30**		**$ 8,575.00**

TOTAL THIS INVOICE **$ 8,575.00**

Stris & Maher LLP

Invoice # 14472 February 21, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14261	11/04/24	47,165.00	37,732.00	9,433.00
14284	11/14/24	12,985.00	10,388.00	2,597.00
14331	12/19/24	46,190.00	36,952.00	9,238.00
14381	1/13/25	6,285.00	5,028.00	1,257.00

Previous Balance	$ 22,525.00
Balance Due This Invoice	$ 8,575.00
TOTAL BALANCE DUE	**$ 31,100.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 1,257.00	$ 9,238.00	$ 12,030.00	$ .00	$ 22,525.00

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

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

STRIS & MAHER LLP'S SIXTH MONTHLY FEE STATEMENT
FOR THE PERIOD FEBRUARY 1, 2025, THROUGH FEBRUARY 28, 2025

Stris & Maher LLP ("Stris & Maher") submits, pursuant to the Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the "Interim Compensation Order") (ECF No. 264) entered on October 14, 2024, this monthly fee statement for the payment of interim compensation rendered and reimbursement of expenses incurred during the period February 1, 2025, through February 28, 2025 (the "Second Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $624,995.00 (80% of the services rendered), plus $18,425.62 (100% of the interim expenses incurred). *See* Interim Compensation Order at ¶ 1(a). Summaries of the fees and expenses are attached as Exhibits 1, 2, and 3. Invoices reflecting detailed time entries are attached hereto as Exhibit 4.

[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), 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.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall serve within 14 days after delivery of the Second Monthly Fee Statement a written notice, via email, upon Stris & Maher and each of the other Fee Notice Parties (as listed below) (the "Written Notice"). The Written Notice shall set forth with reasonable detail the nature of the objection and the amount at issue. If the parties are unable to reach a resolution of the objection within 14 calendar days, the objecting party shall file its objection (the "Objection") with this Court within 3 business days and serve such Objection on Stris & Maher and each of the other Fee Notice Parties. See Interim Compensation Order ¶ 1(c).

The Fee Notice Parties as defined in the Interim Compensation Order are:

a. Rhodium Enterprises, Inc., Attn: Charles Topping (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 2617 Bissonnet Street, Suite 234, Houston, Texas 77005;

b. Debtors' Bankruptcy Counsel, c/o Quinn Emanuel Urquhart & Sullivan, LLP, Attn: Patricia B. Tomasco (pattytomasco@quinnemanuel.com); Razmig Izakelian (razmigizakelian@quinnemanuel.com), Alain Jaquet (alainjaquet@quinnemanuel.com), and Joanna D. Caytas (joannacaytas@quinnemanuel.com), 700 Louisiana, Suite 3900, Houston, Texas 77002;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (mrobinson@provincefirm.com); David Dunn (ddunn@provincefirm.com); Kirsten Lee (klee@province.com); and Andrew Popescu (apopescu@provincefirm.com), 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074;

d. Galaxy Digital, LLC, in its capacity as DIP Agent, c/o Orrick, Herrington & Sutcliffe LLP, Ryan C. Wooten (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 51 West 52nd Street, New York, New York 10019;

e. Counsel or proposed counsel to any statutory committee appointed in these Chapter 11 Cases; and

f. United States Trustee, Ha Minh Nguyen (ha.nguyen@usdoj.gov), 515 Rusk, Suite 3516, Houston, Texas 77002.

If no objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Stris & Maher an amount equal to 80% of the fees and 100% of the expenses listed herein, or if an objection is timely served, such percentage of fees and expenses that are not subject to an objection, as stated in the Interim Compensation Order.

Respectfully submitted this 3rd day of April, 2025.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
Patricia B. Tomasco (SBN 01797600)
Joanna D. Caytas (SBN 24127230)
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-and-

STRIS & MAHER LLP

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Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on April 3, 2025, a true and correct copy of the foregoing Monthly Fee Statement was served through the Court's Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco
Patricia B. Tomasco

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	12.6	$15,240.00	$12,192.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	969.1	$736,447.50	$589,158.00
007	Retention and Fee Applications	22.5	$16,177.50	$12,942.00
008	Non-working Travel for Whinstone Dispute	32.6	$13,378.75	$10,703.00
Total		1036.8	$781,243.75	$624,995.00

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	$1,250.00	9.2	$11,500.00
Ken Halpern	Partner	1997	$1,100.00	3.4	$3,740.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Peter Stris	Founding Partner	2001	1,450.00	11.50	$16,675.00
Elizabeth Brannen	Managing Partner	2001	1,250.00	85.00	$106,250.00
Bridget Asay	Partner	1997	1,200.00	52.40	$62,880.00
Tillman Breckenridge	Partner	2003	1,200.00	47.00	$56,400.00
Victor O'Connell	Partner	2012	1,025.00	19.90	$20,397.50
John Stokes	Partner	2016	1,025.00	87.10	$89,277.50
Colleen Smith	Associate	2015	850.00	83.40	$70,890.00
Peter Brody	Associate	2016	850.00	53.30	$45,305.00
Sarah Rahimi	Associate	2019	750.00	63.70	$47,775.00
Helen Marsh	Associate	2024	700.00	84.60	$59,220.00
Tanya Tice	Discovery Associate	1989	525.00	142.40	$74,760.00
Monica Viramontes	Senior Paralegal	N/A	425.00	40.50	$17,212.50
Andrew Atsalis	Litigation Fellow	N/A	350.00	71.20	$24,920.00
Cynthia Huang	Litigation Fellow	N/A	350.00	49.50	$17,325.00
Sebastian Delgado	Litigation Fellow	N/A	350.00	2.20	$770.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	32.30	$11,305.00
Jaida Hodge-Adams	Litigation Fellow	N/A	350.00	43.10	$15,085.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	3.90	$4,875.00
Victor O'Connell	Partner	2012	1,025.00	7.10	$7,277.50
Cynthia Huang	Litigation Fellow	N/A	350.00	9.70	$3,395.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	1.80	$630.00

Non-Working Travel for Whinstone Dispute[2]

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Bridget Asay	Partner	1997	1,200.00	12.10	$14,520.00
Victor O'Connell	Partner	2012	1,025.00	7.50	$7,687.50
Andrew Atsalis	Litigation Fellow	N/A	350.00	13.00	$4,550.00
Total after 50% discount					$13,378.75

[2] Stris & Maher has billed its time for travel in connection with the Whinstone dispute during which no work was performed on a separate invoice at a 50% discount.

EXHIBIT 3

Summaries of Expenses for the Fee Period

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
E-discovery platform fees	$5,292.00
Litigation support	$3,374.68
Travel	$1,258.94
Expert fees	$8,400.00
Court fees	$100.00
Total	$18,425.62

EXHIBIT 4

Stris

March 28, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14498
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through February 28, 2025

RE: Midas Green Litigation

Total Professional Services	$ 15,240.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 15,240.00**
Previous Balance	$ 27,178.00
TOTAL BALANCE DUE	**$ 42,418.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14498 March 28, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
2/03/25	EB	Prepare and correspond with Texas counsel regarding notice of order modifying stay.	.50	1250.00	625.00
2/04/25	EB	Correspond with opposing counsel regarding joint submission (0.1); review and begin analyzing draft of same (0.1); correspond with KH, PB, and SR regarding corrections in support of same (0.1).	.30	1250.00	375.00
2/04/25	KJH	Review Midas Green's draft proposed order memorializing the Court's rulings on pretrial motions, motion hearing transcript, and motions, and correspond with EB regarding defects in proposed order.	1.70	1100.00	1,870.00
2/05/25	EB	Revise draft orders on pretrial motions received from opposing counsel (2.6); correspond with KH, BA, co-counsel, and [redacted] regarding proposed revisions to and next steps in support of same (0.1).	2.70	1250.00	3,375.00
2/05/25	KJH	Review draft edits to Midas's proposed order on summary judgment and Dauberts and correspond with EB regarding same.	.60	1100.00	660.00
2/06/25	EB	Correspond with KH and co-counsel regarding revisions to proposed orders (0.2); implement same (0.2); correspond with opposing counsel and confer with [redacted] regarding same (0.1); review and propose revisions to objection to Midas bankruptcy claims (2.9).	3.40	1250.00	4,250.00
2/06/25	KJH	Correspond with EB regarding proposed revisions to draft order on dispositive motions.	.20	1100.00	220.00
2/07/25	EB	Revise proposed orders to incorporate feedback from R. Harrington (0.5); correspond and confer with KH and opposing counsel regarding further revisions to and finalization of same (0.5).	1.00	1250.00	1,250.00
2/07/25	KJH	Review redline to draft proposed order on dispositive motions and correspond with BA, EB, and opposing counsel J. Thomas regarding same (0.5); attend teleconferences with opposing counsel H. Pogorzelski regarding revisions to draft proposed order and Midas proposal to extend time for submission (0.4).	.90	1100.00	990.00

Stris & Maher LLP

Invoice # 14498 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/10/25	EB	Update R. Harrington regarding submission and status.	.10	1250.00	125.00
2/14/25	EB	Correspond with counsel for third party regarding initial response to inquiry.	.10	1250.00	125.00
2/21/25	EB	Correspond with counsel for GRC regarding confidentiality inquiry.	.10	1250.00	125.00
2/24/25	EB	Update [redacted] regarding status (0.1); correspond with Texas counsel and counsel for GRC regarding same and confidentiality request, respectively (0.1).	.20	1250.00	250.00
2/25/25	EB	Correspond with counsel for GRC regarding teleconference to discuss confidentiality inquiry.	.10	1250.00	125.00
2/26/25	EB	Attend teleconference with counsel for GRC (0.4); review correspondence from counsel for GRC providing applicable protective order (0.1) update [redacted] regarding same and potential next steps (0.1).	.60	1250.00	750.00
2/27/25	EB	Communicate with Texas counsel regarding status and steps in support of request for district court ruling.	.10	1250.00	125.00
		TOTAL PROFESSIONAL SERVICES			**$ 15,240.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	9.20	1,250.00	11,500.00
Ken Halpern	KJH	Partner	3.40	1,100.00	3,740.00
Total			**12.60**		**$ 15,240.00**

TOTAL THIS INVOICE **$ 15,240.00**

Stris & Maher LLP

Invoice # 14498 March 28, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14380	1/13/25	8,990.00	7,192.00	1,798.00
14471	2/21/25	25,380.00	.00	25,380.00

Previous Balance	$ 27,178.00
Balance Due This Invoice	$ 15,240.00
TOTAL BALANCE DUE	**$ 42,418.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 25,380.00	$ 1,798.00	$ .00	$ .00	$ 27,178.00

Stris

March 28, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14486
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through February 28, 2025

RE: Whinstone Litigation

Total Professional Services	$ 736,447.50
Total Expenses Advanced	$ 18,425.62
TOTAL THIS INVOICE	**$ 754,873.12**
Previous Balance	$ 860,905.97
TOTAL BALANCE DUE	**$ 1,615,779.09**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Stris & Maher LLP

Invoice # 14486 March 28, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
2/01/25	BA	Continue reviewing new draft waiver/NDA from Whinstone, draft proposed [redacted] regarding same, and convey same to JS, W. Thompson, J. Cohn, and P. Tomasco (0.6); confer with JS and W. Thompson, regarding [redacted], proposed mediation, and other high priority action items (0.7); review W. Thompson's [redacted] email regarding [redacted], revise same, and convey same to client (0.2).	1.50	1200.00	1,800.00
2/01/25	JS	Confer with BA and W. Thompson regarding high priority action items (0.7); confer with VO and correspond with client and co-counsel regarding mediation planning (0.3).	1.00	1025.00	1,025.00
2/02/25	JS	Review and evaluate complaint and Building D contract claims (2.9); attend teleconference with [redacted] regarding litigation status and next steps (0.5).	3.40	1025.00	3,485.00
2/02/25	TT	Review documents as instructed by HM to help prepare for phase 2 litigation and affirmative damages claim.	2.60	525.00	1,365.00
2/03/25	EB	Correspond with HM and NC regarding action items including document review and MV regarding phase 2 exhibit list (0.2); attention to case management (0.5); continue annotating [redacted] phase 1 materials (1.8); advise CS regarding additional information and material in support of [redacted] deposition (0.1); review and analyze proposed form of consulting agreement (0.3); correspond with BA, JS, VO, co-counsel and [redacted] regarding same (0.2).	3.10	1250.00	3,875.00

Stris & Maher LLP

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/03/25	BA	Correspond with HM and PB regarding cell phone data storage, update client and legal team regarding same, and correspond with custodians' counsel regarding same (0.3); correspond with legal team and with opposing counsel regarding mediation (0.1); correspond with bankruptcy counsel regarding SAFE group's discovery requests, confer with bankruptcy counsel and PB regarding same and confer further with PB regarding next steps (0.3); review projections document from bankruptcy counsel, correspond with bankruptcy counsel and with PB, JS, and HM regarding steps for production of same (0.3); review draft consulting agreement for client and correspond with EB regarding same (0.2); research and draft reply memorandum regarding phase 2 scope and convey same to J. Cohn, P. Tomasco, W. Thompson, and JS for review (4).	5.20	1200.00	6,240.00
2/03/25	JS	Evaluate high priority action items in connection with Phase 2 and damages claims.	1.30	1025.00	1,332.50
2/03/25	CS	Review and analyze documents relevant to [redacted] deposition; continue revising outline for [redacted] deposition.	4.10	850.00	3,485.00
2/03/25	CHH	Targeted searching for BA regarding water issues for phase 2 (0.5); attend daily checkpoint teleconference regarding phase 2 document review (0.3); review tenth assigned phase 2 document review batch (2.0); review eleventh assigned phase 2 document review batch (2.0); begin reviewing twelfth assigned phase 2 document review batch (0.5); targeted searching for CS regarding [redacted] for phase 2 (0.5).	5.80	350.00	2,030.00
2/03/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	2.00	350.00	700.00
2/03/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review ninth assigned batch of documents for Phase 2 issues (4.5).	4.80	350.00	1,680.00
2/03/25	PB	Prepare to lead (0.1) and attend (0.3) daily checkpoint teleconference regarding phase 2 and damages document review; attend teleconference with B. Asay and R. Izakelian regarding document production (0.3).	.40	850.00	340.00

Stris & Maher LLP

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/03/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review and respond to team correspondence and questions from document reviewers regarding phase 2 document review (2.3); draft guidance for reviewers and update review memorandum (0.6).	3.20	700.00	2,240.00
2/03/25	TT	Review documents as instructed by HM to prepare for phase 2 litigation (8.3); attend daily checkpoint teleconference regarding phase 2 document review (0.3).	8.60	525.00	4,515.00
2/03/25	MV	Organize, prepare, and update internal exhibit list to reflect, Whinstone water invoices as instructed by counsel.	.70	425.00	297.50
2/04/25	EB	Confer with BA and JS regarding high priority action items (0.5); correspond with HM, MV, and NC regarding action items in support of document review and phase 2 exhibit list (0.2); continue analyzing and correspond with BA, JS, and co-counsel regarding [redacted] information in support of damages complaint (0.5); attend teleconference with client and co-counsel (1.5)	2.70	1250.00	3,375.00
2/04/25	BA	Review edits to phase 2 scope reply from J. Cohn and W. Thompson, correspond with JS regarding same, convey revised draft to client for review, correspond with JH regarding cite check of same and review cite check changes, and convey final draft to P. Tomasco and B. Howell for filing (1.5); confer with JS and EB regarding high priority action items including upcoming mediation, damages claims, and phase 2 preparation (0.5); review GMO filings regarding [redacted] and correspond with PB and litigation team regarding witness transcripts in GMO matter (0.2); correspond with EB, MV, PB and team regarding phase 2 exhibits (0.1); correspond with A. Swartz, P. Tomasco and team regarding [redacted] expert (0.1); participate in teleconference with client team, bankruptcy counsel, and litigation counsel to discuss high priority action items, including damages complaint and mediation preparation (1.5).	3.90	1200.00	4,680.00
2/04/25	JS	Attend call with BA and EB regarding high priority action items for phase 2 and damage case (0.5); attend client weekly touch point call (1.0); further review and evaluate issues with damages complaint (1.1).	2.60	1025.00	2,665.00

Stris & Maher LLP

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/04/25	CS	Continue reviewing documents relevant to [redacted] deposition (2.5).	2.50	850.00	2,125.00
2/04/25	CHH	Targeted searching for CS regarding [redacted] for phase 2 (0.5); daily checkpoint teleconference regarding phase 2 document review (0.3); review twelfth assigned phase 2 document review batch (1.5); begin reviewing thirteenth assigned phase 2 document review batch (0.5); review Quinn document request and begin working on same (0.5).	3.30	350.00	1,155.00
2/04/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	2.00	350.00	700.00
2/04/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review eighth assigned batch of documents for Phase 2 issues (5.5).	5.80	350.00	2,030.00
2/04/25	PB	Attend daily review team status check-in.	.30	850.00	255.00
2/04/25	HM	Review and respond to team correspondence regarding document 2 review (1.1); perform quality check of documents reviewed (0.5); attend daily checkpoint teleconference regarding phase 2 document review (0.3).	1.90	700.00	1,330.00
2/04/25	TT	Attend part of daily checkpoint teleconference regarding phase 2 document review (0.2); Review documents for HM to prepare for phase 2 litigation (9.5).	9.70	525.00	5,092.50
2/04/25	MV	Create and revise various Logikcull searches for target documents for attorneys (2.0); assess court requirements for supplemental exhibit list for Phase 2 (0.7); continue revisions to internal exhibit list and locate, organize, and save potential exhibits (2.5).	5.20	425.00	2,210.00
2/05/25	EB	Attend teleconference with J. Cohn regarding [redacted] analysis in support of complaint (0.4); correspond and confer with Stris team and [redacted] regarding additional materials and analysis in support of same (0.5); review updates and review and respond to correspondence with HM, MV, and litigation fellows regarding document review and exhibit list (0.2); prepare to depose [redacted] (2.5).	3.60	1250.00	4,500.00

Stris & Maher LLP

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/05/25	BA	Review comments from client team and bankruptcy counsel on draft affirmative complaint, correspond with EB and JS regarding same, and convey edits and comments on same to A. Swartz, W. Thompson, and J. Cohn (1.2); correspond with MV and CH regarding potential exhibits for phase 2 (.1); review correspondence from EB, [redacted] and team regarding potential further analysis by [redacted] regarding buildings C and D, as relevant to damages claims (0.1).	1.40	1200.00	1,680.00
2/05/25	JS	Further work on draft damages complaint and potential Phase 2 issues.	1.60	1025.00	1,640.00
2/05/25	SR	Review and analyze [redacted] report, [redacted] report and materials relied upon in connection with [redacted] inquiries regarding materials needed for additional analysis.	2.50	750.00	1,875.00
2/05/25	CS	Continue reviewing documents for [redacted] deposition and revising deposition outline (1.1)	1.10	850.00	935.00
2/05/25	CHH	Daily checkpoint teleconference regarding phase 2 document review (0.2); review thirteenth assigned phase 2 document review batch (1.5); review fourteenth assigned phase 2 document review batch (2.0); continue working on Quinn document request (0.5).	4.20	350.00	1,470.00
2/05/25	NC	Correspond with EB and HM regarding support for Phase 2 document review (0.2); continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims (1.7).	1.90	350.00	665.00
2/05/25	JH	Attend portion of daily checkpoint teleconference regarding phase 2 document review (0.2); review tenth assigned batch of documents for Phase 2 issues (3.5).	3.70	350.00	1,295.00
2/05/25	PB	Attend daily review team meeting regarding Phase 2 preparation (0.2); prepare transfer of data to co-counsel (0.2); call with CH regarding same (0.1).	.50	850.00	425.00
2/05/25	ASA	Continue review of Phase 2 documents produced by Whinstone and tag with relevant issue tags (4.0); gather relevant expert report material to assist SR with review of [redacted] data sources (0.1).	4.10	350.00	1,435.00

Stris & Maher LLP

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/05/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review and respond to team correspondence regarding phase 2 document review (0.4); review documents for phase 2 (5.0).	6.00	700.00	4,200.00
2/05/25	TT	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); continue reviewing documents assigned by HM (7.7).	7.90	525.00	4,147.50
2/05/25	MV	Conduct targeted searching for additional exhibits requested by attorneys (1.5); further update internal exhibit list with current potential exhibits and revise in preparation for phase 2 trial (2.0); further revise and add additional documents to deposition list (0.5).	4.00	425.00	1,700.00
2/06/25	EB	Prepare for and lead Stris team meeting regarding high priority action items (0.6); begin reviewing revised draft complaint (0.5).	1.10	1250.00	1,375.00
2/06/25	SR	Continue reviewing and analyzing [redacted] report, [redacted] report and materials relied upon in connection with [redacted] inquiries regarding materials needed for additional analysis (2.6); correspond with PB. EB, and [redacted] regarding the same (0.3); attend teleconference with EB, PB, HM, MV, JHA, CHH, and ASA regarding collection of relevant [redacted] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.5).	3.40	750.00	2,550.00
2/06/25	CS	Continue reviewing documents relevant to [redacted] deposition; continue revising outline for [redacted] deposition (2.1).	2.10	850.00	1,785.00
2/06/25	CHH	Daily checkpoint teleconference regarding phase 2 document review (0.3); review fifteenth assigned phase 2 document review batch (2.0); review sixteenth assigned phase 2 document review batch (2.0); attend teleconference with EB, PB, SR, HM, MV, JHA, and ASA regarding collection of relevant [redacted] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.5).	4.80	350.00	1,680.00
2/06/25	NC	Review first assigned phase 2 document review batch.	2.00	350.00	700.00

Stris & Maher LLP

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/06/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); re-organize filed exhibits by ECF number at MV request for ease of attorney access (2.0); attend teleconference with EB, PB, SR, HM, MV, JHA, CHH, and ASA regarding collection of relevant [redacted] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.5).	2.70	350.00	945.00
2/06/25	PB	Attend daily review team meeting regarding Phase 2 issues (0.3); attend portion of teleconference with EB, SR, HM, MV, JHA, CHH, and ASA regarding collection of relevant [redacted] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.4).	.70	850.00	595.00
2/06/25	ASA	Daily checkpoint teleconference regarding phase 2 document review (0.3); attend teleconference with EB, PB, SR, HM, MV, JHA, and CHH regarding collection of relevant [redacted] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.5); continue Phase 2 review of documents produced by Whinstone and tag with relevant issue tags (5.1); analyze expert reports of [redacted] and [redacted] for sources of specific power data as requested by EB (1.1).	7.00	350.00	2,450.00
2/06/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review and respond to team correspondence regarding phase 2 document review (1.5); perform quality check of phase 2 document review (1.0); update phase 2 document review memorandum (0.7); attend teleconference with EB, PB, SR, MV, JHA, CHH, and ASA regarding collection of relevant [redacted] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.5).	4.00	700.00	2,800.00
2/06/25	TT	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review documents assigned by HM to support phase 2 litigation (10.5).	10.80	525.00	5,670.00

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/06/25	MV	Continue updating internal exhibit list to add potential exhibits and verify status of exhibits admitted in phase 1 (3.0); attend teleconference with EB, PB, SR, HM, JHA, CHH, and ASA regarding collection of relevant [redacted] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.5).	3.50	425.00	1,487.50
2/07/25	EB	Attend portion of teleconference with client and co-counsel regarding information and next steps in support of finalization of complaint (1.1); attention to regarding action items in light of order setting phase 2 hearing date (0.5).	1.60	1250.00	2,000.00
2/07/25	BA	Participate in teleconference with [redacted], bankruptcy counsel and litigation team regarding affirmative complaint (0.4); participate in teleconference with client team, bankruptcy counsel, and litigation team regarding affirmative complaint and mediation (1.2); confer with JS regarding affirmative complaint and phase 2 proceedings, review phase 2 scheduling order and correspond with client and litigation team to update regarding same, and confer with [redacted] regarding same (0.4).	2.00	1200.00	2,400.00
2/07/25	JS	Attend teleconferences regarding inclusion of certain claims in damages complaint (1.3) and further review and evaluate damages complaint (0.7).	2.00	1025.00	2,050.00
2/07/25	CS	Continue reviewing documents relevant to and revising [redacted] deposition outline.	4.60	850.00	3,910.00
2/07/25	CHH	Confer with PB regarding Quinn Emanuel document request (0.2); daily checkpoint teleconference regarding phase 2 document review (0.6); review seventeenth assigned phase 2 document review batch (2.0); review eighteenth assigned phase 2 document review batch (1.9); review nineteenth assigned phase 2 document review batch (2.0).	6.70	350.00	2,345.00
2/07/25	NC	Daily checkpoint teleconference regarding phase 2 document review (0.6); review second assigned phase 2 document review batch (3.0);	3.60	350.00	1,260.00
2/07/25	JH	Attend part of daily checkpoint teleconference regarding phase 2 document review (0.2); review eleventh assigned batch of documents for Phase 2 issues (3.0).	3.20	350.00	1,120.00
2/07/25	PB	Attend teleconference with CHH regarding production.	.20	850.00	170.00

Stris & Maher LLP

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/07/25	ASA	Continue Phase 2 review of documents produced by Whinstone and tag with relevant issue tags.	8.00	350.00	2,800.00
2/07/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.6); review and respond to team correspondence regarding phase 2 document review (1.5); review documents for phase 2 (5.0).	7.10	700.00	4,970.00
2/07/25	TT	Attend daily checkpoint teleconference regarding phase 2 document review (0.6); review documents for HM to prepare for phase 2 litigation (6.8).	7.40	525.00	3,885.00
2/08/25	EB	Analyze and correspond with BA, JS, and co-counsel regarding further revisions to draft complaint (1.6); review update from client and co-counsel and correspond with BA regarding next steps in support of same (0.1).	1.70	1250.00	2,125.00
2/08/25	BA	Review revised draft complaint and correspond with A. Swartz and J. Cohn regarding same (0.4); review correspondence regarding draft complaint and timing of filing and correspond and confer with JS regarding same (0.3).	.70	1200.00	840.00
2/08/25	JS	Evaluate potential inclusion of certain claims in damages complaint.	1.20	1025.00	1,230.00
2/08/25	HM	Review documents for phase 2 (2.5); review and response to document reviewer team correspondence regarding phase 2 document review (0.5).	3.00	700.00	2,100.00
2/08/25	TT	Review documents as assigned by HM to support upcoming phases of trial and claims.	4.20	525.00	2,205.00
2/09/25	EB	Review and respond to team correspondence regarding phase 2 document review and expert depositions.	.10	1250.00	125.00
2/09/25	BA	Review further correspondence regarding filing of affirmative complaint, review additional client comments on same and correspond with A. Swartz regarding edits to and attachments to same.	.30	1200.00	360.00
2/09/25	JS	Further evaluate potential inclusion of certain claims in damages complaint.	.80	1025.00	820.00

Stris & Maher LLP

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/09/25	CHH	Review twentieth assigned phase 2 document review batch (0.8); review twenty-first assigned phase 2 document review batch (0.8); review twenty-second assigned phase 2 document review batch (0.8); review twenty-third assigned phase 2 document review batch (0.8).	3.20	350.00	1,120.00
2/09/25	TT	Continue reviewing assigned documents.	1.50	525.00	787.50
2/10/25	VO	Correspond with client and team regarding damages analysis in advance of mediation.	.40	1025.00	410.00
2/10/25	EB	Continue preparing for [redacted] expert deposition (2.7); correspond with CS regarding next steps in support of same (0.1); correspond with Stris Team and W. Thompson regarding and continue assisting with additional analysis and document searching in support of damages complaint (0.4); advise TB regarding adequate assurance research and analysis TB (0.2); attend teleconference with PB, SR, and [redacted] regarding additional documentation and analysis in support of [redacted] damages (0.3); attend to high priority phase 2 action items resulting from scope order including staffing, witness preparation planning, document and transcript review, and exhibit list updates and revisions (3.0).	6.70	1250.00	8,375.00
2/10/25	BA	Review second interim order addressing scope of phase 2 (0.3); prepare for phase 2 hearing, including reviewing evidence and potential exhibits, approving new production, and corresponding and conferring with bankruptcy and litigation team regarding strategy, potential briefing, depositions, and witnesses (2.5); review email from T. Schmeltz regarding special committee and correspond with JS regarding same (0.2).	3.00	1200.00	3,600.00
2/10/25	JS	Begin preparing plan for witnesses, exhibits, and briefing for Phase 2 in light of ruling from court.	6.30	1025.00	6,457.50
2/10/25	SR	Attend videoconference with EB, PB, and [redacted] regarding materials needed for additional analysis.	.30	750.00	225.00
2/10/25	TB	Call with E. Brannen regarding question on assumption of contracts; research regarding assumption of contracts in bankruptcy and review of sources (3.6).	3.80	1200.00	4,560.00

Stris & Maher LLP

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/10/25	CS	Review and analyze court order regarding phase two of the motion to assume (0.6); begin reviewing damages complaint and review and respond to email communications regarding the same (1.5); review and analyze documents relevant to Winter Storm Uri energy credits(2.2); continue analyzing [redacted] deposition outline (0.7).	5.00	850.00	4,250.00
2/10/25	CHH	Review twenty-fourth assigned phase 2 document review batch (0.7); review twenty-fifth assigned phase 2 document review batch (0.7); review twenty-sixth assigned phase 2 document review batch (0.7); targeted searching regarding Winter Storm Uri settlement and summarize results from same to EB (0.5); attend daily checkpoint teleconference regarding phase 2 document review (0.2); review twenty-seventh assigned phase 2 document review batch (0.7); review twenty-eighth assigned phase 2 document review batch (0.7); review twenty-ninth assigned phase 2 document review batch (0.7); perform quality control checks regarding phase 2 review batches (0.1); prepare and finalize debtors' production set 19 (0.2).	5.10	350.00	1,785.00
2/10/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.80	350.00	630.00
2/10/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review twelfth assigned batch of documents for Phase 2 issues (5.0).	5.20	350.00	1,820.00
2/10/25	PB	Attend daily review team check in regarding Phase 2 preparation (0.2); preparation for Phase 2 trial (3.1); teleconference with EB, SR, and potential expert (0.3).	3.60	850.00	3,060.00
2/10/25	ASA	Review documents produced by Whinstone and apply Phase 2 issue tags (3.6); collect [redacted] and exhibits at request of EB in support of [redacted] project (0.5); attend daily checkpoint teleconference regarding phase 2 document review (0.2); conduct targeted search for specific Whinstone invoices billed to client (0.6); review Phase 2 documents flagged during quality control and assign appropriate tags (1.2).	6.10	350.00	2,135.00

Stris & Maher LLP

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/10/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review and respond to team correspondence regarding phase 2 document review (1.0); review documents for phase 2 (1.1).	2.30	700.00	1,610.00
2/10/25	TT	Attend daily checkpoint teleconference regarding phase 2 litigation (.2); review documents for HM to prepare for phase 2 litigation (4.7); review [redacted] for EB in support of fraud claim in phase 2 (3.5).	8.40	525.00	4,410.00
2/10/25	MV	Perform additional tarteged searches for email as requested by attorneys (0.5); revise further, review hits, and update team (0.5).	1.00	425.00	425.00
2/11/25	VO	Confer with JS regarding settlement dynamics and strategy (0.7); emails with client and team regarding same (0.4).	1.10	1025.00	1,127.50
2/11/25	EB	Continue preparing to depose [redacted] expert (2.3); confer with CS, ASA, and JHA regarding preparation of exhibits for same and pretrial motions (0.2); attend teleconference with PB, HM, TT, CHH, JHA, and ASA to advise regarding high-priority Phase 2 action items (0.5); assist with final review and correspond with Stris team and co-counsel regarding finalization of damages complaint and accompanying documents and advise Stris team members regarding additional document searching and analysis in support of same (2.0); attend portion of checkpoint teleconference with BA, JS, clients, and co-counsel (1.2).	6.20	1250.00	7,750.00
2/11/25	BA	Participate in teleconference with client team and litigation team to discuss mediation and phase 2 preparation (1.2); confer with CS regarding phase 2 motion in limine, correspond with JS and litigation team regarding phase 2 preparation and meet and confer with opposing counsel, and correspond with opposing counsel regarding depositions and conferral (0.3).	1.50	1200.00	1,800.00
2/11/25	JS	Continue planning for witnesses, exhibits, depositions, and briefing for Phase 2 in light of court order (6.0) and attend portion of client touchpoint call (1.3).	7.30	1025.00	7,482.50

Stris & Maher LLP

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/11/25	TB	Research regarding bankruptcy law requirements for establishing adequate assurance and when that is necessary; call with J. Stokes regarding specific parameters of adequate assurance issue.	6.80	1200.00	8,160.00
2/11/25	CS	Attend teleconference with EB, JHA, and ASA to discuss tasks in support of the deposition of Whinstone's expert [redacted] (0.2); meet with BA to discuss motion in limine to file in advance of Phase 2 hearing on motion to assume (0.2); beginning reviewing filings and background materials in preparation for drafting motion in limine (3.8); continue reviewing and analyzing damages complaint (0.8).	5.00	850.00	4,250.00
2/11/25	CHH	Attend teleconference with EB, PB, HM, TT, JHA, and ASA regarding high-priority Phase 2 action items (0.5); assist EB with targeted searching regarding ancillary invoices (0.5).	1.00	350.00	350.00
2/11/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.90	350.00	665.00
2/11/25	JH	Attend teleconference with EB, CS, JHA, and ASA to discuss tasks in support of the deposition of Whinstone's expert [redacted] (0.2); attend teleconference with EB, PB, HM, TT, CHH, JHA, and ASA regarding high-priority Phase 2 action items (0.5); assist MV, EB and A. Swartz (LKC) in verifying the confidentiality of given filings in support of Rhodium's damages complaint (2.0).	2.90	350.00	1,015.00
2/11/25	PB	Prepare for Phase 2 trial.	4.30	850.00	3,655.00
2/11/25	ASA	Finish review of Phase 2 documents produced by Whinstone flagged during quality control and assign appropriate tags (2.5); attend teleconference with EB, PB, HM, TT, JHA, and CHH regarding high-priority Phase 2 action items (0.5); attend teleconference with EB, CS, and JHA to discuss tasks in support of the deposition of Whinstone's expert [redacted] (0.2); assist with review of orders issued by the arbitrator and Phase 1 trial exhibits in support of preparing damages complaint exhibits (1.5).	4.70	350.00	1,645.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/11/25	HM	Attend teleconference with EB, PB, TT, CHH, JHA, and ASA regarding high-priority Phase 2 action items (0.5); review and analyze hot documents for potential use in Phase 2 hearing and affirmative damages case (2.4).	2.90	700.00	2,030.00
2/11/25	TT	Attend teleconference with EB, PB, HM, CHH, JHA, and ASA regarding high-priority Phase 2 action items (0.5); analyze related materials and summarize [redacted] testimony of [redacted] in preparation for phase 2 (8.5); review and Analyze additional [redacted] in preparation for phase 2 (2.0).	11.00	525.00	5,775.00
2/11/25	MV	Create and revise Logikcull various target searches for documents, review hits, correspondence regarding the same (2.0); correspondence with paralegal regarding filing of Phase 2 exhibits and exhibit list, review current documents (0.2); search of previously filed exhibit list and confirm exhibits filed under seal, correspondence regarding the same (0.8).	3.00	425.00	1,275.00
2/12/25	VO	Prepare for mediation (0.8); review emails from client regarding same (0.2); confer with JS regarding same (0.3).	1.30	1025.00	1,332.50
2/12/25	EB	Continue working on and advising Stris team regarding high priority action items in support of phase 2 and damages claim including exhibit list and document searching and analysis (5.3); review and respond to correspondence from [redacted] and update PS, BA, and JS regarding same (0.1).	5.40	1250.00	6,750.00
2/12/25	BA	Continue preparing for mediation and phase 2 of the hearing, including reviewing analyses of outstanding invoices, reviewing potential exhibits, conferring with JS, PB, HM, and EB regarding strategy and preparation, conferring with A. Peloubet regarding status of invoices and hearing preparation, and correspond with P. Tomasco and team regarding hearing date and attempts to confer with opposing counsel.	1.80	1200.00	2,160.00
2/12/25	JS	Prepare for mediation (2.3) and for Phase 2 of assumption litigation (3.5).	5.80	1025.00	5,945.00
2/12/25	SR	Review energy consumption data in connection with [redacted] request and correspond with [redacted] regarding the same.	1.50	750.00	1,125.00
2/12/25	TB	Review case law regarding adequate assurance and write results of research.	3.60	1200.00	4,320.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/12/25	CS	Begin drafting motion in limine regarding ancillary services charges; review and analyze case law relevant to the same (5.4).	5.40	850.00	4,590.00
2/12/25	CHH	Email HM regarding phase 2 document review (0.1); assist EB with targeted searching in support of phase 2 (1.0).	1.10	350.00	385.00
2/12/25	PB	Preparation for trial Phase 2.	7.50	850.00	6,375.00
2/12/25	ASA	Gather relevant Court orders and recently filed damages complaint and send to Rhodium expert [redacted] (0.6); update internal memorandum to reflect recent case activity (0.7); compile and organize invoices requested by PB to assist with attorney review (0.2); research [redacted] information requested by EB in support of deposition preparation (2.7).	4.20	350.00	1,470.00
2/12/25	HM	Review, analyze, and prepare documents and potential exhibits for phase 2 hearing.	6.10	700.00	4,270.00
2/12/25	TT	Analyze and summarize materials for EB regarding Building D.	8.80	525.00	4,620.00
2/12/25	MV	Conduct further targeted searches for hot documents as requested by attorneys.	2.00	425.00	850.00
2/13/25	VO	Attend zoom meeting with team regarding phase 2 trial planning and mediation planning (1.5); emails with team regarding mediation position statement (0.2).	1.70	1025.00	1,742.50
2/13/25	PS	Attend internal meeting regarding high priority action items in support of mediation and phase 2 hearing (1.5); confer with individual team members regarding next steps (0.9).	2.40	1450.00	3,480.00
2/13/25	BA	Attend Stris team meeting regarding high priority action items in support of mediation and phase 2 hearing preparation (1.5); correspond with P. Tomasco, JS, EB, and CS regarding mediation position statement and with CS regarding pretrial motion in limine for phase 2 (0.2); review and analyze research and correspondence regarding privilege issues and correspond with litigation team regarding same (0.5).	2.20	1200.00	2,640.00
2/13/25	JS	Continue preparation for mediation (2.0) and Phase 2 of assumption litigation (5.5).	7.50	1025.00	7,687.50

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Date	Tkpr	Description	Hours	Rate	Amount
2/13/25	SR	Attend portion of Stris team meeting regarding high priority action items in support of mediation and phase 2 hearing preparation (0.5); conduct document review regarding energy consumption data in connection with [redacted] request and team correspondence regarding the same (3).	3.50	750.00	2,625.00
2/13/25	TB	Begin research regarding third-party information sharing requested by EB.	2.40	1200.00	2,880.00
2/13/25	CS	Attend portion of Stris team meeting regarding high priority action items in support of mediation and phase 2 hearing preparation (0.6); continue drafting motion in limine for phase 2 hearing (4.0); draft mediation statement (4.9).	9.50	850.00	8,075.00
2/13/25	CHH	Draft memorandum regarding targeted search findings in support of phase 2 (1.5); attend daily checkpoint teleconference regarding phase 2 document review (0.5); attend portion of Stris team meeting regarding high priority action items in support of mediation and phase 2 hearing preparation (0.5);	2.50	350.00	875.00
2/13/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.70	350.00	595.00
2/13/25	JH	Attend teleconference with PS, EB, BA, JS, VO, CS, PB, SR, CHH, MV, JHA, and ASA regarding strategic and high-priority Phase 2 action items (0.5); attend teleconference with HM, TT, CHH, ASA, and NC to discuss the collection of documents tagged in the phase 2 review and found via targeted search that are related to outstanding or contested invoices from Whinstone (0.6); begin collecting documents tagged in the phase 2 review and found via targeted search that are related to outstanding or contested invoices from Whinstone (2.0).	3.10	350.00	1,085.00
2/13/25	JH	Review Bankruptcy trial transcripts to determine which of the exhibits filed under seal were admitted under seal, rather than admitted publicly, for PB review.	2.20	350.00	770.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/13/25	PB	Preparation for trial Phase 2, including analysis of exhibits admitted in Phase 1 (3.9); attend teleconference with PS, EB, BA, JS, VO, CS, SR, CHH, MV, JHA, and ASA regarding strategic and high-priority Phase 2 action items and follow-on call regarding mediation strategy (1.5).	5.40	850.00	4,590.00
2/13/25	ASA	Analyze invoices and conduct targeted searches for supporting documentation at request of HM in support of Phase 2 preparation efforts (7.0); attend daily checkpoint teleconference regarding phase 2 document review (0.5); attend portion of Stris team meeting regarding high priority action items in support of mediation and phase 2 hearing preparation (0.5).	8.00	350.00	2,800.00
2/13/25	HM	Review, analyze, and prepare documents and potential exhibits for phase 2 hearing.	9.50	700.00	6,650.00
2/13/25	TT	Attend daily checkpoint teleconference with HM, ASA, EB, JHA, to prepare for phase 2 targeted document review (0.4); analyze and summarize additional [redacted] for EB in preparation for phase 2 (11.0).	11.00	525.00	5,775.00
2/13/25	MV	Provide attorney CS with requested filed versions of exhibits in support of upcoming deposition (1.5); attend teleconference with PS, EB, BA, JS, VO, CS, PB, SR, CHH, JHA, and ASA regarding strategic and high-priority Phase 2 action items (0.5); conduct additional target searches for documents related to disputed invoices, review hits, correspond with team regarding the same, and save for further attorney review (4.0).	6.00	425.00	2,550.00
2/14/25	EB	Review, propose revisions to, and correspond with Stris team and co-counsel regarding mediation brief (0.5); review updates from TT and attend to high priority phase 2 action items including analysis in support of cross-examinations (1.2).	1.70	1250.00	2,125.00
2/14/25	BA	Review and revise draft mediation statement prepared by CS, correspond with JS regarding strategy for same, and and review further edits from JS and P. Tomasco (2.4); draft proposed response to Whinstone's counsel regarding phase 2 hearing, correspond with litigation team regarding same, and convey same to M. Moore (0.7).	3.10	1200.00	3,720.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/14/25	BA	Participate in teleconference with [redacted] and PB to assess status of invoices as relevant to preparation for phase 2 hearing.	.40	1200.00	480.00
2/14/25	JS	Work on mediation preparation and related issues.	2.20	1025.00	2,255.00
2/14/25	SR	Continue conducting document review regarding energy consumption data in connection with [redacted] request (0.8); continue reviewing and analyzing materials and drafting notes in support of [redacted] claims, damages, and expert analysis (4.2).	5.00	750.00	3,750.00
2/14/25	TB	Continue research regarding regarding third party disclosures for EB and JS.	2.40	1200.00	2,880.00
2/14/25	CS	Continue drafting and revising mediation statement (1.6); continue drafting motion in limine for phase 2 hearing (1.5)	3.10	850.00	2,635.00
2/14/25	CHH	Attend daily checkpoint teleconference regarding phase 2 document review (0.6); update targeted search findings memorandum in support of phase 2 (0.5); attend teleconference regarding invoices with [redacted] (Rhodium), PB, BA, and ASA (0.4); assist HM with invoice review in support of phase 2 (3.5); review JS email regarding Quinn Emanuel document request and continue working on same (0.2).	5.20	350.00	1,820.00
2/14/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	5.30	350.00	1,855.00
2/14/25	JH	Attend teleconference with HM, TT, CHH and ASA to discuss the collection of documents tagged in the phase 2 review and found via targeted search that are related to outstanding or contested invoices from Whinstone (0.5); continue collecting documents tagged in the phase 2 review and found via targeted search that are related to outstanding or contested invoices from Whinstone (4.0); distribute updated exhibit list tracking which exhibits from Bankruptcy Phase 1 were admitted under seal or publicly to attorney team at PB request (0.5).	4.00	350.00	1,400.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/14/25	PB	Preparation for trial Phase 2 (3.6); teleconference with [redacted], BA, and ASA regarding Phase 2 issues (0.4); attend internal discovery team meeting regarding Phase 2 issue analysis (0.5).	4.50	850.00	3,825.00
2/14/25	ASA	Attend teleconference regarding invoices with [redacted] (Rhodium), Ashley Jonson (Rhodium), PB, BA, and CHH (0.4); conduct targeted searches for invoice documentation and assist HM with drafting of memorandum in support of phase 2 preparation efforts (5.7); gather privilege log material at request of PB (0.2).	6.30	350.00	2,205.00
2/14/25	HM	Review, analyze, and prepare documents and potential exhibits for phase 2 hearing.	5.50	700.00	3,850.00
2/14/25	TT	Attend daily checkpoint teleconference with HM, PB, JH, CH, AA regarding phase 2 targeted invoice searches (0.6); continue analyzing and summarize [redacted] testimony regarding [redacted] for EB (7.1).	7.70	525.00	4,042.50
2/14/25	MV	Qc internal document with exhibit admission tracker (0.2); assist with further targeted searches for attorney review (0.3).	.50	425.00	212.50
2/15/25	EB	Review and analyze memorandum from co-counsel and related materials and correspond with BA, TB, and JS regarding next steps in support of assessment of action items resulting from same.	1.50	1250.00	1,875.00
2/15/25	BA	Review analysis of potential phase 2 invoices prepared by HM to prepare for phase 2 trial.	.30	1200.00	360.00
2/15/25	JS	Prepare for presentation to Special Committee regarding damages complaint.	3.50	1025.00	3,587.50
2/15/25	TB	Consider issues and engage in further legal research regarding third party disclosures.	1.60	1200.00	1,920.00
2/15/25	HM	Finalize and circulate phase 2 invoice document analysis memorandum in preparation for the phase 2 hearing.	1.50	700.00	1,050.00
2/16/25	EB	Review and correspond with HM regarding memorandum analyzing phase 2 invoices and related documents (0.3); review and respond to further correspondence from BA, TB, JS, and co-counsel regarding research and update to [redacted] (0.5).	.80	1250.00	1,000.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/16/25	BA	Review draft memorandum from LKC regarding privilege issues and correspond with JS, EB, and TB regarding strategy and potential issues relevant to privilege concerns.	.40	1200.00	480.00
2/16/25	JS	Prepare for (1.5) and confer (0.8) with Special Committee regarding potential damages claims; attend board meeting regarding mediation (2.3); work on mediation follow-up (1.0).	5.60	1025.00	5,740.00
2/16/25	TB	Review memorandum regarding third party disclosures and advise regarding duties of directors.	2.80	1200.00	3,360.00
2/17/25	VO	Confer with PS, EB, and JS regarding mediation and strategy (0.6); confer with JS regarding same (0.4).	1.00	1025.00	1,025.00
2/17/25	PS	Attend teleconference with EB, VO, and JS regarding mediation preparation and case strategy.	.60	1450.00	870.00
2/17/25	EB	Continue working on high priority phase 2-related action items including assessing materials for cross-examination and materials relating to invoices (5.0); review and correspond with BA and JS regarding analysis from TT regarding Building D [redacted] (0.4); attend teleconference with PS, VO, and JS regarding mediation preparation and case strategy (0.6); confer with TT regarding transcript analysis in support of phase 2 cross-examinations (0.2); attend teleconference with BA, JS, PB, and co-counsel to prepare for meet and confer (0.5); correspond with BA, VO, JS, co-counsel and clients regarding mediation preparation (0.1); review and correspond with BA, VO, JS, and LKC co-counsel regarding revisions to objection to Whinstone proof of claim (0.3).	7.10	1250.00	8,875.00
2/17/25	BA	Participate in teleconference with JS, EB, PB, and P. Tomasco to prepare for meet and confer with Whinstone's counsel regarding phase 2 hearing (0.5); participate in meet and confer with Whinstone's counsel regarding phase 2 hearing (0.4); review and revise draft objection to Whinstone's proof of claim, correspond with litigatoin team regarding same, and correspond with P. Tomasco regarding edits to same (0.5); continue preparing for mediatoin and phase 2 hearing, including reviewing deposition [redacted] analyses, conferring with JS regarding hearing strategy, and correspond with JS, PB, and EB regarding potential phase 2 issues (2.2).	3.60	1200.00	4,320.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/17/25	JS	Assist in preparation for mediation (2.3) and prepare for Phase 2 trial (1.4).	3.70	1025.00	3,792.50
2/17/25	TB	Analyze additional documents and research regarding third party information sharing.	2.40	1200.00	2,880.00
2/17/25	CS	Continue drafting motion in limine for Phase 2 hearing.	6.90	850.00	5,865.00
2/17/25	PB	Prepare for Phase 2 hearing, including preparation of testimony of [redacted] and compilation of exhibits and cross-examination material (4.8); teleconference with JS, BA, EB, P. Tomasco, and J. Cohn regarding mediation and key Phase 2 action items (0.5).	5.30	850.00	4,505.00
2/17/25	TT	Confer with EB to coordinate review and summary of [redacted] regarding phase 2 (0.2); continue analysis and summary of prior [redacted] testimony of two [redacted] witnesses (6.0).	6.20	525.00	3,255.00
2/18/25	VO	Attend mediation planning call with client representatives and co-counsel (0.6); prepare for mediation (4.3).	4.90	1025.00	5,022.50
2/18/25	EB	Attend teleconference with VO, clients, and co-counsel to prepare for mediation (0.5); continue assisting with information and analysis in support of same (1.2); review and analyze additional documents and correspondence from MV and CHH regarding [redacted] invoice and correspond with [redacted] and Stris team regarding follow-up questions regarding same (0.9); continue working on additional high priority phase 2 action items (2.0); attend phase 2 document review checkpoint teleconference to advise regarding additional action items (0.7); coordinate hot seat and graphics support for phase 2 (0.2).	5.50	1250.00	6,875.00
2/18/25	BA	Prepare for mediation and phase 2 hearing.	1.00	1200.00	1,200.00
2/18/25	JS	Assist in preparation for mediation (1.3); attend teleconference regarding exit financing issues (1.1); prepare for Phase 2 trial (1.5).	3.90	1025.00	3,997.50

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Date	Tkpr	Description	Hours	Rate	Amount
2/18/25	SR	Continue reviewing and analyzing materials and drafting notes in support of [redacted] claims, damages, and expert analysis (3.7); review and analyze EB and [redacted] correspondence relating to [redacted] invoices in connection with the same (0.9); review correspondence and correspond with CHH regarding latest [redacted] calculations to assist EB (0.3).	4.90	750.00	3,675.00
2/18/25	CS	Begin drafting Phase 2 opening slides (2.5); review and potential exhibits for Phase 2 hearing (1.2)	3.70	850.00	3,145.00
2/18/25	CHH	Assist EB, BA, and JS with targeted searching regarding curtailments in support of phase 2 (1.0); update internal targeted searching memorandum in light of same (0.2); attend daily checkpoint teleconference with EB, PB, and HM regarding phase 2 document review (0.7); assist EB, PB, and HM with further targeted searching in light of same (1.5); assist PB with [redacted] (Rhodium) direct preparations (0.1).	3.50	350.00	1,225.00
2/18/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	1.20	350.00	420.00
2/18/25	PB	Attend daily checkpoint teleconference with EB, PB, HM, and CH regarding phase 2 document review (0.7); follow-up call with CH regarding same (0.3); draft direct examination outline for Phase 2 testimony (3.8).	4.80	850.00	4,080.00
2/18/25	ASA	Assist EB by gathering relevant analysis by expert [redacted] (0.4); update internal detailed tracking memorandum (0.3); search for and identify documentation related to Phase 2 invoices (0.3).	1.00	350.00	350.00
2/18/25	HM	Attend daily checkpoint teleconference with EB, PB, HM, and CH regarding phase 2 document review (0.7); revise and continue drafting phase 2 invoices analysis memorandum (6.0).	6.70	700.00	4,690.00
2/18/25	SD	Print and compile materials for mediation session (1.1); compile mediation materials into an e-binder (0.8).	1.90	350.00	665.00
2/18/25	TT	Continue analyzing and summarizing prior [redacted] testimony for EB in support of phase 2 trial preparation.	8.80	525.00	4,620.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/18/25	MV	Further update and revise internal exhibit list (1.0); further review admitted trial exhibits used in Phase 1 and update official Phase 2 exhibit list regarding the same (0.5).	1.50	425.00	637.50
2/19/25	VO	Attend mediation.	9.00	1025.00	9,225.00
2/19/25	PS	Review Whinstone's emergency motion to continue phase 2 and confer with team regarding same and mediation updates.	2.40	1450.00	3,480.00
2/19/25	EB	Attend teleconference with PB regarding action items including additional phase 2 exhibit searches (0.2); review and comment on draft [redacted] direct examination [redacted] (0.9); attention to case management and upcoming hearing staffing (0.4); analyze additional information from [redacted] regarding [redacted] invoice and correspond with [redacted] regarding follow-up requests (1.1); attend teleconference with SR regarding high priority [redacted] and phase 2 action items (0.2); correspond with Stris team and co-counsel regarding high priority action items including [redacted] deposition (0.2); prepare for same (1.5); attend teleconference with PB regarding phase 2 witness preparation and exhibits (1.0); prepare Rhodium witness preparation materials (1.9); review, propose revisions, and correspond with BA and PB regarding motion in limine (0.7); review mediation updates and correspond with Stris team members and Fulcrum regarding status and resulting action items (0.2).	8.30	1250.00	10,375.00
2/19/25	BA	Attend and participate in mediation (6); review and revise motion in limine for phase 2 and correspond and confer with team regarding same (2.8); review Whinstone's motion to continue hearing, confer with team regarding same, and begin drafting opposition to same (1.2).	10.00	1200.00	12,000.00
2/19/25	JS	Prepare for Phase 2 trial.	2.20	1025.00	2,255.00
2/19/25	SR	Confer with EB regarding [redacted] and phase 2 high priority action items (0.2); review team and [redacted] correspondence and documents pertaining to [redacted] invoices and June 10, 2023 mining in connection with [redacted] phase 2 and damages analysis (0.7)	.90	750.00	675.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/19/25	CS	Review and analyze emergency motion to continue Phase 2 hearing (0.5); draft section of response to motion to continue (2.0); continue drafting Phase 2 opening slides (0.6); review edits to and revise motion in limine (2.1); prepare exhibits, declaration, and proposed order granting motion in limine (1.3) finalize and file motion in limine and supporting materials (1.4).	7.90	850.00	6,715.00
2/19/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims.	2.10	350.00	735.00
2/19/25	PB	Preparation for Phase 2 trial (4.9); teleconference with EB regarding priority discovery items (0.2); teleconference with EB regarding key Phase 2 preparation issues (1.0); teleconference with JS regarding preparation for Phase 2 opening (0.3).	6.40	850.00	5,440.00
2/19/25	ASA	Support mediation efforts of attorneys ahead of Phase 2 hearing (6.5); review Whinstone's motion to continue hearing and draft shell of opposition to same at request of BA (1.0); revise internal tracking memorandum to reflect case updates and relevant preparatory material ahead of Phase 2 hearing (0.5).	8.00	350.00	2,800.00
2/19/25	HM	Revise phase 2 invoice analysis memorandum (3.6); review and analyze documents for EB (1.5).	5.10	700.00	3,570.00
2/19/25	TT	Analyze and summarize [redacted] testimony of Whinstone witness for EB in preparation for phase 2 (9.0).	9.00	525.00	4,725.00
2/19/25	MV	Further revise internal exhibit list to cover documents cited in draft motion in limine (4.0); correspond with QE paralegal regarding exhibit list requirements (0.1); create further targeted searches, review hits, and correspond with attorneys regarding same (2.0); pull additional documents for attorneys to be used as Phase 2 trial exhibits (0.4).	6.50	425.00	2,762.50

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Date	Tkpr	Description	Hours	Rate	Amount
2/20/25	PS	Prepare for (1.4) and attend (0.7) teleconference with EB, CS, PB, SR, HM, and MV regarding action items in support of emergency hearing and phase 2 imminent deadlinesreview draft opposition to Whinstone motion and email EB and team (0.4); attend portion of zoom with EB, BA, JS, and PB regarding high priority action items (0.4).	2.90	1450.00	4,205.00
2/20/25	EB	Confer with NC regarding status and revisions to [redacted] memorandum (0.1); attend teleconference with PS, CS, PB, SR, HM, and MV regarding action items in support of emergency hearing and phase 2 imminent deadlines (1.1); confer and review and respond to correspondence with Stris team and co-counsel regarding emergency hearing and high priority action items including phase 2 contingency preparations (0.5); attend to same in consultation with Stris team and co-counsel (3.5); correspond with opposing counsel regarding Peters deposition and phase 2 agreement memorialization (); attend teleconference with BA, JS, PB, P. Tomasco, and other fiduciaries with SAFE representatives regarding mediation strategy (0.7); attend further Stris team teleconference regarding high priority action items (0.6); confer with BA, JS, and P. Tomasco regarding action items including revisions to phase 2 order and client update and convey same (0.9).	7.30	1250.00	9,125.00
2/20/25	BA	Continue drafting opposition to motion to continue and preparing for phase 2 hearing if needed, including conferring with EB regarding same and conferring with CS regarding filings (1); correspond and confer with CS regarding potential filing of opposition to Whinstone's continuance motion and potential hearing on motion in limine and confer with EB regarding potential hearing on motion in limine/status conference (0.2); participate in teleconference with P. Tomasco, mediator Mullin, SAFE representations and client representatives to discuss mediation (0.7); confer with EB, PB, JS, and PS regarding offer from SAFEs/Riot and next steps (0.6); confer with EB, P. Tomasco, and JS regarding upcoming status conference, steps to finalize agreement regarding phase 2, and mediation/offer (1); correspond with litigation and bankruptcy team regarding Rhodium and Whinstone's proposals to document agreement regarding phase 2 and (0.4).	3.90	1200.00	4,680.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/20/25	JS	Attend call with SAFE group and Debtor team regarding Riot settlement offer (0.8); evaluate and move forward next steps in light of same (0.7).	1.50	1025.00	1,537.50
2/20/25	SR	Continue reviewing and analyzing materials and drafting notes in support of [redacted] claims, damages, and expert analysis (4.1); attend teleconference with PS, EB, CS, PB, HM, and MV regarding action items in support of emergency hearing and phase 2 imminent deadlines (1.1); review and revise Opposition to Whinstone's Continuance Motion (0.4).	5.60	750.00	4,200.00
2/20/25	CS	Attend teleconference with PS, EB, CS, PB, SR, HM, and MV regarding action items in support of emergency hearing and phase 2 imminent deadlines (1.1); review and revise opposition to motion to continue (2.2); draft declaration in support of opposition to motion to continue phase 2 hearing and compile exhibits in support of the same (1.1); review motion in limine to prepare for hearing regarding the same (0.4); continue preparing Phase 2 opening slides (0.3).	5.10	850.00	4,335.00
2/20/25	NC	Confer with EB regarding case status and high priority action items (0.1); add additional materials and continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [redacted] phase 2 and damages claims (1.5).	1.60	350.00	560.00
2/20/25	PB	Preparation for Phase 2 trial, including exhibits and drafting direct examination outline (3.5); attend portion of teleconference with PS, EB, CS, SR, HM, and MV regarding action items in support of emergency hearing and Phase 2 imminent deadlines (0.7); attend teleconference with Ad Hoc Group regarding mediation (0.7); attend follow-up call with EB, JS, BA, and PS regarding same (0.6); teleconference with R. Izakelian, R. Lopez, and R. Vasquez regarding document transfer (0.2).	5.70	850.00	4,845.00
2/20/25	ASA	Create witness preparation PowerPoint at request of PB.	1.50	350.00	525.00

Stris & Maher LLP

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Date	Tkpr	Description	Hours	Rate	Amount
2/20/25	HM	Attend teleconference with PS, EB, CS, PB, SR, HM, and MV regarding action items in support of emergency hearing and phase 2 imminent deadlines (1.1); review and revise [redacted] deposition outline (1.0); revise phase 2 invoices analysis memorandum (1.2); review and analyze documents for phase 2 exhibit list (1.1).	4.40	700.00	3,080.00
2/20/25	MV	Continue revising exhibit list and preparing additional exhibits (3.0); review confidentiality designations and prepare exhibit cover sheets for filing (0.5); conduct additional searches for bates versions of invoices (0.5); attend teleconference with PS, EB, CS, PB, SR, HM regarding action items in support of emergency hearing and phase 2 imminent deadlines (1.1).	5.60	425.00	2,380.00
2/21/25	PS	Confer with team and plan for damages case.	.90	1450.00	1,305.00
2/21/25	EB	Confer with SR regarding high priority action items in wake of phase 2 resolution (0.2); confer with and advise Stris team members including JS, CS, and TT regarding same (0.4); attend hearing (0.1); attention to resulting action items including correspondence with co-counsel and opposing counsel and revisions to agreed order (2.6).	3.30	1250.00	4,125.00
2/21/25	BA	Prepare for and participate in status conference/hearing to discuss phase 2 issues (0.5); review draft proposed agreed orders and correspond with team regarding same (0.3).	.80	1200.00	960.00
2/21/25	JS	Continue planning for damages case.	1.50	1025.00	1,537.50
2/21/25	SR	Confer with EB regarding high priority action items in support of damages analysis and in wake of phase 2 resolution (0.2); continue reviewing materials and drafting notes in connection with the same (6.7).	6.90	750.00	5,175.00
2/21/25	CS	Attend hearing on motion to continue and motion in limine (0.2); review and revise proposed agreed order on motion to assume contracts and exhibit thereto (1.0); research statute of limitations issues for damages complaint and begin drafting memorandum regarding the same (2.9).	4.10	850.00	3,485.00
2/21/25	PB	Attend hearing regarding Phase 2 trial scheduling.	.30	850.00	255.00

Stris & Maher LLP

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/21/25	ASA	Assist EB with formatting and finalizing of proposed agreed order granting Debtors' motion and supplemental motion to assume certain executory contracts with Whinstone US, Inc. prior to filing (2.0); at request of PB, excerpt relevant portions of bates-stamped documents for use in witness preparation PowerPoint (0.7); update internal status memorandum to reflect agreement and cancellation of Phase 2 hearing (0.2).	2.90	350.00	1,015.00
2/21/25	HM	Review and analyze hot documents identified in phase 2 document review.	.60	700.00	420.00
2/21/25	SD	Prepare materials for BA for 02-21-2025 hearing (0.3).	.30	350.00	105.00
2/22/25	SR	Continue reviewing materials and drafting notes in support of [redacted] claims, damages, and expert analysis	4.90	750.00	3,675.00
2/24/25	EB	Confer with W. Thompson (0.2) and JS (0.5) regarding status and high priority action items; attend teleconferences with [redacted] (0.8) regarding same and BA (0.3) regarding high priority research action items; advise TB and CS regarding research questions regarding appeal and damages complaint (0.5); attend teleconference with Stris team and A. Swartz regarding document and discovery related action items (1.1); review updates and correspond with TB and CS regarding follow-up questions (0.1); attention to case management (0.5); review updates and correspond with HM regarding [redacted] (0.1); review notice of appeal and update [redacted] regarding same (0.1); attention to resulting action items including corresponding with TB regarding additional analysis and next steps regarding same (0.3).	.40	1250.00	500.00

Stris & Maher LLP

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/24/25	BA	Review order entered on motion to assume, convey same to client, correspond with PS, JS, and EB regarding potential appeal of order on motion to assume, review appeal documents filed by Whinstone, and review research on same from TB (0.4); confer with EB regarding high priority action items including appeal and document review for adversary proceeding (0.3); participate in teleconference with EB, JS, PB, HM, and A. Swartz to discuss high priority action items, including appeal of order on motion to assume and discovery matters related to adversary proceeding (1.1); review draft notice of appearance for adversary proceeding and correspond with team regarding same (0.1).	1.90	1200.00	2,280.00
2/24/25	JS	Call with EB regarding high priority action items in connection with settlement and damages case (0.5); call with EB, BA, PS, HM, SR, and A. Schwartz regarding document discovery issues in connection with damages case (1.1); review and evaluate research issues in connection with Whinstone appeal and damages case (1.7); prepare for mediation follow-up and confer with client team regarding same (2.2).	6.50	1025.00	6,662.50
2/24/25	SR	Attend teleconference with EB, BA, JS, PB, HM, A. Schwartz to discuss high priority action items relating to damages complaint (1.1); review materials and take notes in connection with the same to assist EB analysis (7.9).	9.00	750.00	6,750.00
2/24/25	TB	Review procedures and engage in legal research regarding bankruptcy appeals both to the district court and on direct certified appeal to the Fifth Circuit and plan regarding appeal of prior decisions.	5.20	1200.00	6,240.00
2/24/25	CS	Continue researching statute of limitations for fraudulent inducement claim and drafting legal memorandum regarding the same (4.1).	4.10	850.00	3,485.00
2/24/25	JH	Update bankruptcy docket.	1.00	350.00	350.00
2/24/25	PB	Prepare documents for disclosure in response to Rule 2004 request (1.0); call with discovery vendor regarding same (0.1); attend strategy teleconference with EB, BA, JS, HM, and A. Swartz regarding discovery action items (1.1).	2.20	850.00	1,870.00

Stris & Maher LLP

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/24/25	ASA	Update detailed tracking memorandum to reflect case developments and precise substance of the agreed order on the motion to assume (0.3); attention to ensuring proper docket notices for attorneys in adversarial damages case at request of EB (1.4).	1.70	350.00	595.00
2/24/25	HM	Confer with PB, EB, JS, BA, SR, and A. Swartz regarding appeal of motion to assume and high priority discovery items for adversary case (1.1); coordinate with ASA and PH regarding case management and notices of filing (2.2); draft notices of appearance for adversary case (0.7).	4.00	700.00	2,800.00
2/25/25	VO	Confer with JS regarding mediation issues and strategy.	.50	1025.00	512.50
2/25/25	PS	Review JS assessment in support of settlement and briefly evaluate relevant underlying documents.	.60	1450.00	870.00
2/25/25	EB	Review initial research results from TB and CS (0.3); attend teleconference with BA regarding high priority action items including follow-up research requests (0.3); advise TB and CS regarding same (0.3); attention to discovery-related action items including document assessment and collection (1.5); advise HM regarding revisions to notice of appearance (0.1); attend checkpoint teleconference with BA, clients, and co-counsel (0.5); correspond with TT regarding instructions for upcoming [redacted] and revisions to prior summary (0.2); review and respond to correspondence from BA and JS regarding additional high priority analysis and action items including correspondence to opposing counsel (0.2).	3.40	1250.00	4,250.00
2/25/25	BA	Attend teleconference with EB regarding high priority action items including follow-up research requests (0.3); participate in teleconference with litigation counsel, bankruptcy counsel, and client regarding case status and strategy (0.5); review update from JS on meeting with mediator, confer with W. Thompson regarding supersedeas deposit in Milam County, research and draft proposed email to Whinstone's counsel regarding same, and convey to litigation team and bankruptcy counsel for review (0.4).	1.20	1200.00	1,440.00
2/25/25	JS	Review and evaluate SAFE note and next steps in connection with mediation (5.9); attend call with mediator and client team (1.3).	7.20	1025.00	7,380.00

Stris & Maher LLP

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/25/25	SR	Continue reviewing materials and taking notes in support of [redacted] claims, damages, and expert analysis.	1.30	750.00	975.00
2/25/25	TB	Research and planning regarding appeal schedule and legal research regarding path going forward for appeal.	3.60	1200.00	4,320.00
2/25/25	CS	Continue researching statute of limitations issues on fraudulent inducement claim and drafting memorandum regarding the same (3.8).	3.80	850.00	3,230.00
2/25/25	HM	Review and respond to team correspondence regarding documents for use in adversary proceeding (2.5); finalize and file notices of appearance for BA and JS in adversary proceeding (0.5).	3.00	700.00	2,100.00
2/25/25	TT	Review and analyze damages complaint to assist EB with analysis of additional supporting material.	1.00	525.00	525.00
2/26/25	PS	Confer with JS regarding strategic planning.	.90	1450.00	1,305.00
2/26/25	EB	Review updated statute of limitations research from CS (0.1); correspond with BA, JS, and CS regarding revisions to same (0.1); review correspondence and initial research results from TB regarding appeal and correspond regarding same (0.1); work on discovery-related action items including coordinating and instructing Stris team regarding further [redacted] review (2.0); begin reviewing revised summary from TT (0.1).	2.40	1250.00	3,000.00
2/26/25	BA	Review and analyze drafts of memorandum regarding fraudulent inducement claim prepared by CS and correspond with CS, JS, and EB regarding edits to same (0.6); review AEO documents for which designation is being challenged by SAFEs and correspond with bankruptcy counsel regarding same and scheduling of meeting with SAFEs to discuss (0.4); review document preservation letter sent by Whinstone to Rhodium investors, research same, and correspond with EB regarding follow up research on nonparties' preservation obligations (0.3).	1.30	1200.00	1,560.00
2/26/25	JS	Strategic planning for damages case.	3.00	1025.00	3,075.00
2/26/25	SR	Continue reviewing materials and conducting factual research in connection with damages complaint and draft memorandum summarizing preliminary findings (7.8); correspond with EB regarding the same (0.2).	8.00	750.00	6,000.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/26/25	TB	Legal research regarding grounds for dismissal of bankruptcy appeals.	4.00	1200.00	4,800.00
2/26/25	CS	Continue reviewing and analyzing case law regarding statute of limitations for fraudulent inducement claim and continue revising memorandum regarding the same (1.9).	1.90	850.00	1,615.00
2/26/25	CHH	Assist CS with targeted searches regarding Winter Storm Uri release.	.30	350.00	105.00
2/26/25	JH	Distribute documents previously designated Highly Confidential and challenged by SAFE entities to BA, HM and PB at BA request (0.5); update bankruptcy docket (0.4); update adversary case docket (0.2).	1.10	350.00	385.00
2/26/25	PB	Prepare for teleconference with SAFEs regarding discovery matters.	.30	850.00	255.00
2/26/25	ASA	Analyze materials and revise memorandum with instructions for additional damages-related and potential privilege review as instructed by EB and HM (5.0); attend to further updates to internal detailed tracking memorandum (0.4).	5.40	350.00	1,890.00
2/26/25	HM	Review and respond to team correspondence regarding preparation for the adversary case (0.5); perform legal research for EB, BA, and JS (1.0); review and analyze discovery requests and productions for correspondence regarding Winter Storm Uri in phase 1 for EB (2.2).	3.70	700.00	2,590.00
2/26/25	TT	Analyze and summarize additional [redacted] testimony regarding [redacted].	5.50	525.00	2,887.50
2/27/25	PS	Attend teleconference with EB, BA, JS, PB, CS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal.	.80	1450.00	1,160.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/27/25	EB	Correspond with BA, TB, and JS regarding further appeal research (0.1); confer with W. Thompson regarding status and high priority action items and correspond with W. Thompson and A. Swartz regarding pro hac applications (0.2); review drafts and correspond with PS, JS and SR regarding revisions to same (0.1); review order assigning district judge Hanks and correspond with ASA and JHA regarding resulting action items (0.1); review procedure and materials from JHA regarding assigned judge and correspond with A. Swartz and SR regarding revisions resulting from same (0.6); analyze revised statute of limitations memorandum and correspond with BA, JS, and CS regarding next steps (0.2); correspond with co-counsel regarding same (0.1); work on discovery-related action items and strategy (1.1); update [redacted] regarding status (0.1); attention to case management including correspond with HM regarding calendaring of additional deadlines (0.1); prepare for (0.4) and lead (1.0) Stris team teleconference to discuss high priority action items; correspond with HM, TT, and CHH to coordinate further [redacted] review (0.2); review memorandum from SR regarding Uri representations, analyze related documents, and correspond with CS and SR regarding revisions to same (1.2); analyze potential next steps in light of correspondence from HM regarding third party preservation obligations and correspond with BA, JS, and HM regarding same (0.2).	5.70	1250.00	7,125.00
2/27/25	BA	Attend first half of teleconference with EB, JS, PB, PS, CS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (0.5); confer with EB regarding appeal and adversary proceeding action items (0.2).	.70	1200.00	840.00
2/27/25	JS	Continue evaluating SAFE issues in connection with mediation (1.3); continue strategic planning for damages case (1.0); confer with [redacted] regarding issues related to mediation (0.5); attend portion of teleconference with EB, BA, PB, PS, CS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (0.5); attend teleconference with SAFE group and QE regarding professional eyes only designation issue (0.2).	3.50	1025.00	3,587.50

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Date	Tkpr	Description	Hours	Rate	Amount
2/27/25	SR	Attend teleconference with EB, BA, JS, PB, PS, CS, TB, MV, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (1); review team pro hac vice applications and conduct legal research in connection with the same (0.4); continue conducting factual research in connection with damages complaint (1.5).	2.90	750.00	2,175.00
2/27/25	TB	Legal research and planning regarding stay of bankruptcy proceedings in light of appeal (4.4); attend part of planning teleconference with Stris attorneys PS, EB, BA, JS, CS, PB, SR, MV, CHH, ASA, and JSA (0.5).	4.90	1200.00	5,880.00
2/27/25	CS	Attend teleconference with EB, BA, JS, PB, PS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (1.0); review and revise memorandum regarding factual background of [redacted] (2.4).	3.40	850.00	2,890.00
2/27/25	CHH	Attend teleconference with EB, BA, JS, PB, PS, CS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (1.0); assist JS and PS with SAFE document searches (0.2); coordinate with vendor, EB, QH, and TT regarding [redacted] and review (0.5); assist SR with preparation of pro hac vice applications for appeal (0.2).	1.90	350.00	665.00
2/27/25	JH	Attend teleconference with EB, BA, JS, PB, PS, CS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (1.0); prepare notes for same (0.6); research background information on [redacted] for Whinstone appeal to S.D. Tex. (1.0).	2.60	350.00	910.00
2/27/25	PB	Attend portion of teleconference with EB, BA, JS, PS, CS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (0.5); teleconference with JS regarding meet and confer (0.1); attend meet and confer with counsel for SAFEs regarding confidentiality issues (0.3).	.90	850.00	765.00

Stris & Maher LLP

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/27/25	ASA	Attend teleconference with EB, BA, JS, PB, PS, CS, TB, MV, SR, CHH, and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (1.0); update internal memorandum to reflect recent developments (0.2).	1.20	350.00	420.00
2/27/25	HM	Conduct research for EB and BA relating to non-party preservation obligations in support of response to correspondence asserting same.	1.50	700.00	1,050.00
2/27/25	TT	Analyze and summarize [redacted] of [redacted] in support of damages claim.	4.20	525.00	2,205.00
2/27/25	MV	Attend teleconference with EB, BA, JS, PB, PS, CS, TB, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal.	1.00	425.00	425.00
2/28/25	EB	Review and analyze stay research from TB (0.3); correspond with BA, TB, JS, and litigation fellows regarding follow-up questions and requests (0.1); advise NC regarding assistance with privilege log review and related research and analysis (0.2); begin analyzing same (2.8); review and respond to team correspondence regarding status and high priority action items (0.5); attention to case management (0.2); attend teleconference with TT regarding initial questions and guidance regarding further [redacted] review (0.2); attention to mediation update and resulting action items (0.1); analyze materials and work on discovery strategy (1.0).	5.40	1250.00	6,750.00
2/28/25	BA	Review pro hac motion and judge's procedures.	.30	1200.00	360.00
2/28/25	JS	Work on high priority action items in connection with damages case.	2.00	1025.00	2,050.00
2/28/25	SR	Attend to pro hac vice applications for PKS, JS, BA, and CS and correspond with team regarding the same (1.1); continue conducting factual research in connection with damages complaint (2).	3.10	750.00	2,325.00
2/28/25	TB	Analyze potential arguments, conduct research, and summarize legal issues involved in potential stay of bankruptcy proceedings.	3.50	1200.00	4,200.00

Stris & Maher LLP

Invoice # 14486 March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/28/25	CS	Review and approve pro hac vice application for appeal of Phase 1 ruling to district court.	.10	850.00	85.00
2/28/25	CHH	Assist SR with preparation of pro hac vice applications for appeal (0.4); emails with EB, QH, and TT regarding [redacted] collection from vendor (0.2); summarize TB research regarding bankruptcy stay (0.3);	.90	350.00	315.00
2/28/25	NC	Work on preparation of privilege log as advised by EB.	5.20	350.00	1,820.00
2/28/25	JH	Check for updates in ongoing matter [redacted] at SR request.	.80	350.00	280.00
2/28/25	ASA	Review [redacted] memorandum and begin preparation of timeline of relevant events at request of EB.	1.10	350.00	385.00
2/28/25	HM	Review and revise adversary case review memorandum (0.8); continue performing research for EB (1.8).	2.60	700.00	1,820.00
2/28/25	TT	Analyze and summarize additional Rhodium communications in support of damages claim.	8.10	525.00	4,252.50
		TOTAL PROFESSIONAL SERVICES			**$ 736,447.50**

Invoice # 14486 March 28, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	11.50	1,450.00	16,675.00
Elizabeth Brannen	EB	Partner	85.00	1,250.00	106,250.00
Bridget Asay	BA	Partner	52.40	1,200.00	62,880.00
Tillman Breckenridge	TB	Partner	47.00	1,200.00	56,400.00
Victor O'Connell	VO	Partner	19.90	1,025.00	20,397.50
John Stokes	JS	Partner	87.10	1,025.00	89,277.50
Colleen Smith	CS	Associate	83.40	850.00	70,890.00
Peter Brody	PB	Associate	53.30	850.00	45,305.00
Sarah Rahimi	SR	Associate	63.70	750.00	47,775.00
Helen Marsh	HM	Associate	84.60	700.00	59,220.00
Tanya Tice	TT	Discovery Associate	142.40	525.00	74,760.00
Monica Viramontes	MV	Sr Paralegal	40.50	425.00	17,212.50
Andrew Atsalis	ASA	Fellow	71.20	350.00	24,920.00
Cynthia Huang	CHH	Fellow	49.50	350.00	17,325.00
Sebastian Delgado	SD	Fellow	2.20	350.00	770.00
Nicholas Capalbo	NC	Fellow	32.30	350.00	11,305.00
Jaida Hodge-Adams	JH	Fellow	43.10	350.00	15,085.00
Total			**969.10**		**$ 736,447.50**

Stris & Maher LLP

Invoice # 14486 March 28, 2025

EXPENSES ADVANCED

Date	Task	Description	Amount
2/01/25		Logikcull Discovery Solutions (February 2025).	2,646.00
2/04/25		Peregrine Consultants - January 2025.	8,400.00
2/14/25		Bankruptcy court filing fee.	100.00
2/15/25		AA airfare for Dallas mediation.	521.78
2/18/25		AA lodging in Dallas for mediation.	657.96
2/25/25		Setec Investigations invoice.	3,374.68
2/26/25		AA transportation to airport.	79.20
2/28/25		Logikcull Discovery Solutions (March 2025).	2,646.00
		TOTAL EXPENSES ADVANCED	**$ 18,425.62**
		TOTAL THIS INVOICE	**$ 754,873.12**

Stris & Maher LLP

Invoice # 14486 March 28, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14366	1/13/25	132,202.25	111,327.25	20,875.00
14459	2/21/25	840,030.97	.00	840,030.97
		Previous Balance		$ 860,905.97
		Balance Due This Invoice		$ 754,873.12
		TOTAL BALANCE DUE		**$ 1,615,779.09**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 840,030.97	$ 20,875.00	$ .00	$ .00	$ 860,905.97

Stris

March 28, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14500
Client # 00346
Matter # 008

INVOICE SUMMARY

For professional services rendered through February 28, 2025

RE: Non-working Travel for Whinstone Dispute

Total Professional Services	$ 26,757.50
50% discount	$ -13,378.75
Net Professional Services	$ 13,378.75
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 13,378.75**

Electronic Invoice

Stris & Maher LLP

Invoice # 14500 March 28, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
2/18/25	VO	Travel to mediation.	4.50	1025.00	4,612.50
2/18/25	BA	Travel from Montpelier VT to Dallas TX, not otherwise billed.	4.60	1200.00	5,520.00
2/18/25	ASA	Travel from Barnstable, MA to Dallas, TX to support mediation efforts.	7.00	350.00	2,450.00
2/19/25	VO	Return travel from mediation.	3.00	1025.00	3,075.00
2/20/25	BA	Travel back to Montpelier, VT from Dallas TX following mediation.	7.50	1200.00	9,000.00
2/20/25	ASA	Return travel from Dallas, TX to Barnstable, MA after supporting mediation efforts.	6.00	350.00	2,100.00

TOTAL PROFESSIONAL SERVICES	**$ 26,757.50**
50% discount	$ -13,378.75
NET PROFESSIONAL SERVICES	**$ 13,378.75**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Bridget Asay	BA	Partner	12.10	1,200.00	14,520.00
Victor O'Connell	VO	Partner	7.50	1,025.00	7,687.50
Andrew Atsalis	ASA	Fellow	13.00	350.00	4,550.00
Total			**32.60**		**$ 26,757.50**

TOTAL THIS INVOICE **$ 13,378.75**

Stris

March 28, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14499
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through February 28, 2025

RE: Retention and Fee Applications

Total Professional Services	$ 16,177.50
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 16,177.50**
Previous Balance	$ 9,832.00
TOTAL BALANCE DUE	**$ 26,009.50**

Electronic Invoice

Stris & Maher LLP

Invoice # 14499 March 28, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
2/10/25	CHH	Begin working on first interim fee application.	1.00	350.00	350.00
2/11/25	VO	Emails and confer with CH regarding quarterly fee application (0.4); emails with B. Howell regarding same (0.1)	.50	1025.00	512.50
2/11/25	CHH	Draft first interim fee application.	5.50	350.00	1,925.00
2/12/25	CHH	Draft first interim fee application.	3.00	350.00	1,050.00
2/13/25	VO	Review, revise, and further prepare interim fee application.	5.30	1025.00	5,432.50
2/13/25	CHH	Assist VO with exhibits for first interim fee application.	.20	350.00	70.00
2/20/25	EB	Prepare portions of monthly fee statement.	.50	1250.00	625.00
2/21/25	EB	Prepare portions of monthly fee statement.	3.40	1250.00	4,250.00
2/21/25	NC	Assist EB with portions of fee statements.	1.80	350.00	630.00
2/24/25	VO	Work on January fee application.	1.30	1025.00	1,332.50

TOTAL PROFESSIONAL SERVICES **$ 16,177.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	3.90	1,250.00	4,875.00
Victor O'Connell	VO	Partner	7.10	1,025.00	7,277.50
Cynthia Huang	CHH	Fellow	9.70	350.00	3,395.00
Nicholas Capalbo	NC	Fellow	1.80	350.00	630.00
Total			**22.50**		**$ 16,177.50**

TOTAL THIS INVOICE **$ 16,177.50**

Stris & Maher LLP

Invoice # 14499 March 28, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14381	1/13/25	6,285.00	5,028.00	1,257.00
14472	2/21/25	8,575.00	.00	8,575.00

Previous Balance	$ 9,832.00
Balance Due This Invoice	$ 16,177.50
TOTAL BALANCE DUE	**$ 26,009.50**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 8,575.00	$ 1,257.00	$ .00	$ .00	$ 9,832.00

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

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

STRIS & MAHER LLP'S SEVENTH MONTHLY FEE STATEMENT
FOR THE PERIOD MARCH 1, 2025, THROUGH MARCH 31, 2025

Stris & Maher LLP ("Stris & Maher") submits, pursuant to the Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the "Interim Compensation Order") (ECF No. 264) entered on October 14, 2024, this monthly fee statement for the payment of interim compensation rendered and reimbursement of expenses incurred during the period March 1, 2025, through March 31, 2025 (the "Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $416,800.00 (80% of the services rendered), plus $21,970.41 (100% of the interim expenses incurred). *See* Interim Compensation Order at ¶ 1(a). Summaries of the fees and expenses are attached as Exhibits 1, 2, and 3. Invoices reflecting detailed time entries are attached hereto as Exhibit 4.

[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), 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.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall serve within 14 days after delivery of the Monthly Fee Statement a written notice, via email, upon Stris & Maher and each of the other Fee Notice Parties (as listed below) (the "Written Notice"). The Written Notice shall set forth with reasonable detail the nature of the objection and the amount at issue. If the parties are unable to reach a resolution of the objection within 14 calendar days, the objecting party shall file its objection (the "Objection") with this Court within 3 business days and serve such Objection on Stris & Maher and each of the other Fee Notice Parties. See Interim Compensation Order ¶ 1(c).

The Fee Notice Parties as defined in the Interim Compensation Order are:

a. Rhodium Enterprises, Inc., Attn: Charles Topping (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 2617 Bissonnet Street, Suite 234, Houston, Texas 77005;

b. Debtors' Bankruptcy Counsel, c/o Quinn Emanuel Urquhart & Sullivan, LLP, Attn: Patricia B. Tomasco (pattytomasco@quinnemanuel.com); Razmig Izakelian (razmigizakelian@quinnemanuel.com), Alain Jaquet (alainjaquet@quinnemanuel.com), and Joanna D. Caytas (joannacaytas@quinnemanuel.com), 700 Louisiana, Suite 3900, Houston, Texas 77002;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (mrobinson@provincefirm.com); David Dunn (ddunn@provincefirm.com); Kirsten Lee (klee@province.com); and Andrew Popescu (apopescu@provincefirm.com), 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074;

d. Galaxy Digital, LLC, in its capacity as DIP Agent, c/o Orrick, Herrington & Sutcliffe LLP, Ryan C. Wooten (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 51 West 52nd Street, New York, New York 10019;

e. Counsel or proposed counsel to any statutory committee appointed in these Chapter 11 Cases; and

f. United States Trustee, Ha Minh Nguyen (ha.nguyen@usdoj.gov), 515 Rusk, Suite 3516, Houston, Texas 77002.

If no objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Stris & Maher an amount equal to 80% of the fees and 100% of the expenses listed herein, or if an objection is timely served, such percentage of fees and expenses that are not subject to an objection, as stated in the Interim Compensation Order.

Respectfully submitted this 29th day of April, 2025.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
Patricia B. Tomasco (SBN 01797600)
Joanna D. Caytas (SBN 24127230)
Cameron Kelly (SBN 24120936)
Alain Jaquet (*pro hac vice)*
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Email: razmigizakelian@quinnemanuel.com

-and-

STRIS & MAHER LLP

Peter K. Stris (pro hac vice)
Victor O'Connell (pro hac vice)
John Stokes (pro hac vice)
Peter Brody (pro hac vice)
Helen Marsh (pro hac vice)

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-and-

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Todd Disher (pro hac vice)
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alexis@lkcfirm.com
408 W. 11th Street, 5th Floor
Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on April 29, 2025, a true and correct copy of the foregoing Monthly Fee Statement was served through the Court's Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco
Patricia B. Tomasco

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	15.4	$16,695.00	$13,356.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	580.4	$493,202.50	$394,562.00
007	Retention and Fee Applications	9.8	$11,102.50	$8,882.00
Total		605.6	$521,000.00	$416,800.00

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	9.70	12,125.00
Bridget Asay	Partner	1997	1,200.00	.50	600.00
Ken Halpern	Partner	1997	1,100.00	1.70	1,870.00
Helen Marsh	Associate	2024	700.00	2.50	1,750.00
Andrew Atsalis	Litigation Fellow	N/A	350.00	1.00	350.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Peter Stris	Founding Partner	2001	1,450.00	23.80	34,510.00
Elizabeth Brannen	Managing Partner	2001	1,250.00	61.50	76,875.00
Bridget Asay	Partner	1997	1,200.00	27.60	33,120.00
Tillman Breckenridge	Partner	2003	1,200.00	47.90	57,480.00
Matthew Seligman	Partner	2013	1,100.00	23.80	26,180.00
Victor O'Connell	Partner	2012	1,025.00	18.90	19,372.50
John Stokes	Partner	2016	1,025.00	73.90	75,747.50
Colleen Smith	Associate	2015	850.00	44.80	38,080.00
Peter Brody	Associate	2016	850.00	4.00	3,400.00
Sarah Rahimi	Associate	2019	750.00	8.70	6,525.00
Helen Marsh	Associate	2024	700.00	21.90	15,330.00
Lisa Sherrod	Lead Discovery Assoc	2001	625.00	15.30	9,562.50
Tanya Tice	Discovery Associate	1989	525.00	132.70	69,667.50
Monica Viramontes	Senior Paralegal	N/A	425.00	11.90	5,057.50
Andrew Atsalis	Litigation Fellow	N/A	350.00	26.30	9,205.00
Cynthia Huang	Litigation Fellow	N/A	350.00	7.70	2,695.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	3.10	1,085.00
Jaida Hodge-Adams	Litigation Fellow	N/A	350.00	26.60	9,310.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	8.30	10,375.00
Victor O'Connell	Partner	2012	1,025.00	.30	307.50
Nicholas Capalbo	Litigation Fellow	N/A	350.00	1.20	420.00

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EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
E-discovery platform fees	$3,765.00
Expert fees	$7,950.00
Total	$11,715.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
E-discovery platform fees	$2,646.00
Litigation support	$2,776.30
Travel	$4,433.11
Court fees	$400.00
Total	$10,255.41

EXHIBIT 4

Stris

April 23, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14530
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through March 31, 2025

RE: Midas Green Litigation

Total Professional Services	$ 16,695.00
Total Expenses Advanced	$ 11,715.00
TOTAL THIS INVOICE	**$ 28,410.00**
Previous Balance	$ 21,361.00
TOTAL BALANCE DUE	**$ 49,771.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14530 April 23, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
3/03/25	EB	Review docket and confer with Texas counsel regarding status and anticipated timing (0.4); update [redacted] regarding same and GRC request (0.1).	.50	1250.00	625.00
3/04/25	EB	Review correspondence from counsel for GRC and correspond with [redacted] regarding response to same.	.10	1250.00	125.00
3/05/25	EB	Correspond with (0.1) and attend teleconference with counsel for GRC regarding confidentiality inquiry (0.1).	.20	1250.00	250.00
3/06/25	EB	Correspond with R. Harrington regarding revised objections to Midas proofs of claim (0.2); advise HM regarding research in support of additional grounds for same (0.3); analyze results and perform further research in support of same (1.9); propose revisions to same (0.7).	3.10	1250.00	3,875.00
3/06/25	ASA	Review and compile internal documents regarding technical expert to provide information requested by KH and EB in support of oppositoin to Midas patent claim.	.50	350.00	175.00
3/06/25	HM	Conduct research for EB regarding Kessler doctrine and law of the case.	2.50	700.00	1,750.00
3/07/25	EB	Analyze further revised objections to Midas proof of claim and correspond with R. Harrington regarding same.	.40	1250.00	500.00
3/10/25	EB	Correspond with JHA and ASA regarding objections to Midas claims.	.10	1250.00	125.00
3/13/25	EB	Review and respond to correspondence from KH regarding inquiry from opposing counsel (0.1); review correspondence from opposing counsel regarding notice to Rhodium (0.1); begin analyzing issues resulting from same (0.4).	.60	1250.00	750.00
3/13/25	KJH	Attend teleconference with Midas counsel H. Pogorzelski regarding GRC subpoena to Midas for Rhodium documents (0.2); correspond with EB regarding same and resulting action items (0.3).	.50	1100.00	550.00

Stris & Maher LLP

Invoice # 14530 April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/14/25	EB	Review and analyze issues relating to further correspondence from counsel for Midas Green relating to Immersion Systems (0.5); discuss same with BA (0.5); advise PB and ASA regarding research in support of Immersion Systems analysis (0.1); review results of same (0.1); correspond with [redacted] and [redacted] regarding update from Midas-GRC discovery hearing and response to outstanding inquiries (0.2).	1.40	1250.00	1,750.00
3/14/25	BA	Confer with EB regarding requests for production to Midas Greene of Rhodium/Immersion documents in a separate lawsuit.	.50	1200.00	600.00
3/17/25	EB	Prepare initial responses to correspondence from opposing counsel and correspond with [redacted] and [redacted] regarding same (0.2); review further correspondence from opposing counsel and additional third party recipient (Ameritex) and respond to counsel for Ameritex (0.2); analyze discovery hearing transcript (0.4); correspond with KH regarding same (0.1); send initial responses to opposing counsel (0.1).	1.00	1250.00	1,250.00
3/17/25	KJH	Confer with EB regarding GRC subpoena to Midas (0.1); correspond with EB regarding status and action items in support of proposed written dispositive motions order from Judge Albright (0.2).	.30	1100.00	330.00
3/18/25	EB	Review correspondence from KH regarding status and potential steps in support of request for written ruling (0.1); prepare for (0.1); and attend (0.3) teleconference with counsel for Ameritex; correspond with KH regarding resulting action items (0.1).	.60	1250.00	750.00
3/18/25	KJH	Analyze, confer with PB regarding, and update EB regarding Ameritex information in support of response to Ameritex counsel and to Midas regarding Rhodium's position on subpoena seeking Ameritex documents from Midas-Rhodium litigation.	.80	1100.00	880.00

Stris & Maher LLP

Invoice # 14530 April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/19/25	EB	Respond to correspondence from counsel for Ameritex with interim update and review interim update from opposing counsel (0.1); correspond with [redacted] regarding open questions and action items including potential motion practice and deadline (0.2); correspond with opposing counsel and ASA regarding status and subpoena scope (0.2); confer with KH regarding action items including record assessment in support of response to Ameritex (0.1).	.60	1250.00	750.00
3/19/25	KJH	Teleconference with EB regarding record assessment in support of response to GRC subpoena to Midas seeking Rhodium and Ameritex documents.	.10	1100.00	110.00
3/19/25	ASA	Detailed tracking of Rhodium, Ameritex, and Midas positions based upon correspondence regarding third- party subpoena and potential production of Rhodium and Ameritex documents as outside counsel eyes only.	.50	350.00	175.00
3/20/25	EB	Review correspondence from counsel for Midas and proposed orders submitted by GRC and Midas (0.2); correspond with clients (0.1) and counsel for Ameritex (0.1) regarding same.	.40	1250.00	500.00
3/21/25	EB	Review and analyze order and update [redacted] and [redacted] regarding same (0.2); confer with counsel for Ameritex regarding Rhodium position with respect to confidentiality and subpoena scope and advise ASA regarding updates to [redacted] memorandum (0.2).	.40	1250.00	500.00
3/23/25	EB	Correspond with opposing counsel and counsel for Ameritex regarding Rhodium position (0.1); correspond with opposing counsel to request notice to Immersion Systems in the event of future broader scope subpoena (0.1).	.20	1250.00	250.00
3/26/25	EB	Update [redacted] and [redacted] regarding status of case and interim update from discussions with [redacted] and opposing counsel.	.10	1250.00	125.00
		TOTAL PROFESSIONAL SERVICES			**$ 16,695.00**

Stris & Maher LLP

Invoice # 14530 April 23, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	9.70	1,250.00	12,125.00
Bridget Asay	BA	Partner	.50	1,200.00	600.00
Ken Halpern	KJH	Partner	1.70	1,100.00	1,870.00
Helen Marsh	HM	Associate	2.50	700.00	1,750.00
Andrew Atsalis	ASA	Fellow	1.00	350.00	350.00
Total			**15.40**		**$ 16,695.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
2/28/25		JND Discovery Invoice for February 2025.	3,765.00
3/04/25		Peregrine Consultants - February 2025.	7,950.00
		TOTAL EXPENSES ADVANCED	**$ 11,715.00**
		TOTAL THIS INVOICE	**$ 28,410.00**

Stris & Maher LLP

Invoice # 14530 April 23, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14380	1/13/25	8,990.00	7,192.00	1,798.00
14471	2/21/25	25,380.00	21,057.00	4,323.00
14498	3/28/25	15,240.00	.00	15,240.00

Previous Balance	$ 21,361.00
Balance Due This Invoice	$ 28,410.00
TOTAL BALANCE DUE	**$ 49,771.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 15,240.00	$ .00	$ 4,323.00	$ 1,798.00	$ .00	$ 21,361.00

Stris

April 23, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14517
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through March 31, 2025

RE: Whinstone Litigation

Total Professional Services	$ 493,202.50
Total Expenses Advanced	$ 10,255.41
TOTAL THIS INVOICE	**$ 503,457.91**
Previous Balance	$ 902,700.62
TOTAL BALANCE DUE	**$ 1,406,158.53**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Stris & Maher LLP

Invoice # 14517 April 23, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
3/01/25	JS	Review and evaluate issues arising from mediation.	1.00	1025.00	1,025.00
3/02/25	JS	Evaluate strategy for Whinstone litigation in connection with potential plan confirmation issues.	1.70	1025.00	1,742.50
3/02/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	2.60	525.00	1,365.00
3/03/25	VO	Confer with JS regarding strategy for damages case.	.80	1025.00	820.00
3/03/25	EB	Update TB regarding case status and upcoming action items including record designations (0.1); advise NC, further revise, and correspond with BA, JS, and PB regarding revisions to initial analysis of Whinstone privilege log to support further review and assessment of issues and deficiencies relating to same (0.9); correspond with SR, CHH, and A. Swartz regarding pro hac applications (0.1); work on discovery strategy and staffing for damages case and assess highest priority action items (2.0); review and analyze update from HM regarding Whinstone's [redacted] discovery representations and correspond with SR, ASA, and NC regarding revisions to related memorandum and timeline (0.4); analyze and correspond with TT regarding updates from further review (0.2).	3.70	1250.00	4,625.00
3/03/25	BA	Correspond and confer with CS regarding analysis of issues with respect to adversary proceeding (0.3); correspond with EB, PB, and JS regarding analysis of Whinstone's privilege log as relevant to claims in adversary proceeding (0.1).	.40	1200.00	480.00
3/03/25	JS	Confer with VO regarding strategy for damages case (0.8); evaluate next steps in light of mediation outcome (0.5).	1.30	1025.00	1,332.50
3/03/25	SR	Attend to pro hac vice applications for PKS, JS, BA, and CS and correspond with team regarding the same (1.0); review CS edits to memorandum relating to damages complaint and further revise same to incorporate additional facts and research (2.2).	3.20	750.00	2,400.00
3/03/25	TB	Telephone call with EB to discuss status and upcoming action items.	.10	1200.00	120.00

Stris & Maher LLP

Invoice # 14517 April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/03/25	CS	Correspond and confer with BA to discuss research on various questions related to adversary proceeding (0.3); begin reviewing and analyzing case law and drafting memorandum regarding the same (3.7).	4.00	850.00	3,400.00
3/03/25	CHH	Finalize pro hac vice applications for bankruptcy appeal and confer with SR and PH regarding same (0.5); telephone call with SDTX clerk regarding same (0.2).	.70	350.00	245.00
3/03/25	NC	Update privilege log analysis as directed by EB and circulate to attorney team.	1.30	350.00	455.00
3/03/25	ASA	Continue preparing timeline of key representations related to [redacted].	2.40	350.00	840.00
3/03/25	HM	Review, analyze, and summarize phase 1 discovery correspondence and documents for EB.	2.00	700.00	1,400.00
3/03/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	8.00	525.00	4,200.00
3/04/25	EB	Advise litigation fellows in support of discovery-related action items (0.2); review and analyze updates from TT and advise regarding further document review and analysis (0.3); attention to preservation notices sent to third-parties (0.2).	.70	1250.00	875.00
3/04/25	BA	Participate in weekly teleconference with client, litigation counsel, and bankruptcy counsel to discuss appeal, adversary proceeding, case strategy, and settlement discussions.	1.00	1200.00	1,200.00
3/04/25	JS	Attend weekly client touchpoint call (1.0); evaluate next steps in light of mediation outcome (0.5).	1.50	1025.00	1,537.50
3/04/25	SR	Review and analyze documents to be added to memorandum summarizing factual research relating to damages complaint and correspond with MV regarding the same.	.60	750.00	450.00
3/04/25	CS	Continue analyzing case law and drafting memorandum in support of adversary proceeding [redacted].	3.60	850.00	3,060.00
3/04/25	CHH	Update draft pro hac vice applications for bankruptcy appeal (0.2); telephone call with SDTX clerk regarding same (0.2); file pro hac vice applications for bankruptcy appeal (0.3).	.70	350.00	245.00
3/04/25	JHA	Check for ongoing updates in litigation pending against [redacted] at SR request.	1.80	350.00	630.00

Stris & Maher LLP

Invoice # 14517 April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/04/25	ASA	Review client documents to revise [redacted] for reference by document reviewers in support of damages case (0.7); update document review memorandum with information requested by EB (0.8).	1.50	350.00	525.00
3/04/25	HM	Coordinate with ASA, JHA, and CH regarding ongoing task assignments.	.50	700.00	350.00
3/04/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	9.30	525.00	4,882.50
3/04/25	MV	Create saved searches in support of attorney review of additional documents.	1.00	425.00	425.00
3/05/25	EB	Review updated draft and advise NC regarding privilege log analysis (0.2); review team and client correspondence and begin analyzing response to client inquiry (0.7).	.90	1250.00	1,125.00
3/05/25	BA	Correspond with opposing counsel and [redacted] regarding state court bond deposit.	.10	1200.00	120.00
3/05/25	JS	Work on high priority action items for damages case.	2.50	1025.00	2,562.50
3/05/25	NC	Update privilege log analysis.	1.20	350.00	420.00
3/05/25	JHA	Update dockets, including the bankruptcy original and adversary proceedings and the district court appeal.	2.50	350.00	875.00
3/05/25	PB	Coordinate transfer of ESI to co-counsel for response to Rule 2004 requests.	.50	850.00	425.00
3/05/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	8.10	525.00	4,252.50
3/06/25	VO	Attend teleconference with PS, EB, JS, CS, PB, SR, HM, MV, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research.	.80	1025.00	820.00
3/06/25	PS	Prepare for (0.4) and attend (0.8) weekly team zoom.	1.20	1450.00	1,740.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/06/25	EB	Confer with NC regarding status of privilege log analysis (0.1) and BA regarding high priority action items (0.1); attend teleconference with W. Thompson and [redacted] regarding motion to withdraw the reference (0.1); prepare for (0.5) and attend (0.8) Stris team meeting regarding status and high priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research; review related materials and review and respond to team correspondence regarding high priority action items in support of document assessment, claim objections, and analysis in response to client inquiry (0.5).	2.10	1250.00	2,625.00
3/06/25	BA	Review, research, and edit draft omnibus objection to SAFEs' claim, correspond with JS regarding same, and convey comments on same to P. Tomasco (2.4); review draft opposition to motion to withdraw the reference and correspond with P. Tomasco and team regarding same (0.9); review draft memorandum from P. Tomasco regarding [redacted] and research related issues (0.4).	3.70	1200.00	4,440.00
3/06/25	JS	Attend teleconference with PS, EB, VO, CS, PB, SR, HM, MV, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research (0.8); review and evaluate SAFE claim objection (0.9); review and evaluate [redacted] issues (1.0); review and evaluate contract [redacted] issues (1.5); continue to work on high priority action items for damages case (1.0).	5.20	1025.00	5,330.00
3/06/25	SR	Attend teleconference with PS, EB, VO, JS, CS, PB, HM, MV, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research.	.80	750.00	600.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/06/25	CS	Attend teleconference with PS, EB, VO, JS, PB, SR, HM, MV, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research (0.8); review and analyze memorandum regarding [redacted] (1.0); review and analyze power contracts regarding [redacted] or [redacted] economic value (2.4).	4.20	850.00	3,570.00
3/06/25	CHH	Attend teleconference with PS, EB, VO, JS, CS, PB, SR, HM, MV, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research.	.80	350.00	280.00
3/06/25	JHA	Attend teleconference with PS, EB, VO, JS, CS, PB, SR, HM, MV, CHH & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research (0.8); update dockets, including bankruptcy original and adversary proceedings, and district court appeal (0.7).	1.50	350.00	525.00
3/06/25	PB	Attend teleconference with PS, EB, VO, JS, CS, SR, HM, MV, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research (0.8); correspondence with JS regarding [redacted] obligations (0.2).	1.00	850.00	850.00
3/06/25	ASA	Attend teleconference with PS, EB, VO, JS, CS, PB, SR, HM, MV, CHH, and JHA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research (0.8); update document review memorandum to reflect attorney priorities (0.4).	1.20	350.00	420.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/06/25	HM	Attend teleconference with PS, EB, VO, JS, CS, PB, SR, MV, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research (0.8); update damages case document review memorandum (0.5).	1.30	700.00	910.00
3/06/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	8.50	525.00	4,462.50
3/06/25	MV	Attend teleconference with PS, EB, VO, JS, CS, PB, SR, HM, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities and ongoing legal research.	.80	425.00	340.00
3/07/25	EB	Review and respond to updates from TT (0.1); analyze same and correspond with BA and JS regarding potential addition to amended complaint (0.4); correspond with litigation fellows and HM regarding [redacted] action items including [redacted] updates (0.1).	.60	1250.00	750.00
3/07/25	JS	Continue strategic planning for damages case (3.9); confer with [redacted] regarding latest settlement negotiations with Riot (0.2).	4.10	1025.00	4,202.50
3/07/25	ASA	Prepare exports for review in support of damages case (0.6); begin review of additional Rhodium documents to identify information in support of damages case (0.9).	1.50	350.00	525.00
3/07/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	7.10	525.00	3,727.50
3/09/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	2.90	525.00	1,522.50
3/10/25	EB	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	.60	1250.00	750.00
3/10/25	JS	Continue work on analysis of [redacted] energization.	2.00	1025.00	2,050.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/10/25	JHA	Review and update bankruptcy dockets, including district court appeal, bankruptcy appeal and adversary proceeding dockets (1.0); confer with EB regarding status of bankruptcy objections to Midas Green proof of claim in the related matter (0.3).	1.30	350.00	455.00
3/10/25	ASA	Continue analysis of additional Rhodium documents to identify information in support of damages case.	3.70	350.00	1,295.00
3/10/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	9.30	525.00	4,882.50
3/11/25	EB	Review correspondence, begin analyzing issues, and correspond with BA, TB, and JS regarding appellate record designations (0.6); review correspondence and materials from P. Tomasco regarding same (0.1); attention to case management (0.5).	1.20	1250.00	1,500.00
3/11/25	BA	Participate in weekly call with bankruptcy counsel, litigation counsel, and client (0.4); review Whinstone's designation of record for appeal, correspond with EB, TB, and JS regarding issues related to same, correspond with P. Tomasco regarding same, and review related research (0.4); correspond with P. Tomasco and with W. Thompson and A. Swartz regarding preparation of motion to recover bond deposit with state court (0.3).	1.10	1200.00	1,320.00
3/11/25	JS	Continue evaluating [redacted] energization issue (2.0); review and evaluate letter from SAFE group regarding disclosure of Stris and LKC information (1.2) and confer with P. Tomasco regarding same (0.2); continue preparing go-forward strategy and evaluating key issues in connection with damages case (1.7); attend portion of weekly touchpoint call (0.6).	5.70	1025.00	5,842.50
3/11/25	TB	Plan regarding document designation response; review document designations; review opinion on appropriate designations.	.70	1200.00	840.00
3/11/25	CS	Continue analyzing case law and drafting memorandum regarding adversary proceeding.	1.90	850.00	1,615.00
3/11/25	ASA	Continue analysis of additional Rhodium documents to identify information in support of damages case.	2.20	350.00	770.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/11/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	8.20	525.00	4,305.00
3/12/25	VO	Confer with JS regarding assignments and strategy (1.0); review and respond to email from P. Tomasco regarding draft letter (0.6); confer with PS regarding same (0.3).	1.90	1025.00	1,947.50
3/12/25	EB	Correspond with TT regarding review status and action items (0.1); confer with HM regarding high priority discovery-related action items (0.1); analyze materials and advise HM and litigation fellows regarding revisions to review memorandum (0.5); review team correspondence and correspondence with co-counsel regarding objections to SAFE discovery requests and analyze draft of same (0.2); attention to case management (0.3).	1.20	1250.00	1,500.00
3/12/25	BA	Begin outlining and analyzing issues for motion to release supersedeas deposit in state court (1.5); review and analyze issues relating to energizing [redacted] and correspond with JS regarding same (0.5); review proposed response and correspondence regarding SAFE discovery requests and correspond with JS regarding status of certain discovery matters (0.4).	2.40	1200.00	2,880.00
3/12/25	JS	Evaluate response letter regarding SAFE document requests (0.5) and confer with B. Roth regarding same (0.1); evaluate issues regarding appellate record designation (0.4); further revise [redacted] energization analysis (0.7); evaluate discovery issues that remain to be addressed in damages case (1.5).	3.20	1025.00	3,280.00
3/12/25	TB	Review record designations and docket to assess potential further designations.	1.90	1200.00	2,280.00
3/12/25	CS	Continue analyzing case law and drafting memorandum regarding adversary proceeding.	4.50	850.00	3,825.00
3/12/25	HM	Confer with EB about high priority discovery items (0.1); coordinate with PH to ensure compliance with case deadlines (0.1).	.20	700.00	140.00
3/12/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	9.50	525.00	4,987.50

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Date	Tkpr	Description	Hours	Rate	Amount
3/13/25	VO	Prepare for (0.3) and attend call with P. Tomasco, JS, W. Thomson, and others regarding response to letter (0.7); emails with P. Tomasco and legal team regarding same (0.3).	1.30	1025.00	1,332.50
3/13/25	PS	Prepare for (0.5) and attend (0.9) weekly team zoom.	1.40	1450.00	2,030.00
3/13/25	EB	Prepare for (0.5) and lead (0.9) Stris team meeting; attend teleconference with TT, HM, ASA and JHA regarding status and action items in support of further review (0.5); attend teleconference with MV regarding high priority action items including fellow management (0.2); work on offensive discovery strategy (1.4); review and respond to team correspondence and correspond with Stris team regarding action items including document and privilege log review and analysis (0.2).	3.70	1250.00	4,625.00
3/13/25	BA	Attend portion of teleconference with MV, EB, PS, JS, TB, CS, PB, HM, SR, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal (0.6); continue reviewing Whinstone's record designations for appeal, research issues relating to record designations and motion to strike improper designations, and correspond with P. Tomasco regarding same (0.5); confer with CH regarding Whinstone's record designations (0.1); review correspondence from R. Mates regarding discovery matters and correspond with JS and PB regarding same (0.1); continue analyzing appeal issues raised by Whinstone and correspond with TB, EB, and JS regarding potential waiver of appellate issues (0.5); review potential exhibits for supersedeas bond filing and correspond with JH and HM regarding preparation of exhibits and declaration for supersedeas bond filing (0.3).	2.10	1200.00	2,520.00
3/13/25	JS	Attend teleconference with MV, EB, PS, TB, CS, PB, HM, SR, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal (0.9); push forward key action items related to damages issues on Building D and Winter Storm Uri (1.9).	2.80	1025.00	2,870.00
3/13/25	SR	Attend teleconference with MV, EB, PS, JS, TB, CS, PB, HM, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal.	.90	750.00	675.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/13/25	TB	Review Second Interim Order and plan regarding record needs and counter designations and work on same (4.2); attend part of Stris team call regarding appellate action items including waiver research (0.3).	4.50	1200.00	5,400.00
3/13/25	CS	Attend teleconference with MV, EB, PS, JS, TB, PB, HM, SR, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal (0.6); continue reviewing and analyzing case law in preparation for responding answer in adversary proceeding and drafting memorandum regarding the same (3.2).	3.80	850.00	3,230.00
3/13/25	CHH	Attend teleconference with MV, EB, PS, JS, TB, CS, PB, HM, SR, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal.	.60	350.00	210.00
3/13/25	JHA	Attend teleconference with MV, EB, PS, JS, TB, CS, PB, HM, SR, and CHH to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal (0.6); update internal tracking memorandum with exhibits offered and admitted, including for a limited purpose, in support of appellate motion practice as directed by BA (1.0); attend teleconference with TT, ASA, EB, CHH and HM to discuss ongoing review of Rhodium materials (0.5); begin reviewing additional assigned materials in support of damages claims (2.0); prepare exhibits and provide materials for upcoming motion regarding supersedeas deposit at BA request (1.5).	5.60	350.00	1,960.00
3/13/25	PB	Attend teleconference with MV, EB, PS, JS, TB, CS, HM, SR, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal.	.90	850.00	765.00
3/13/25	ASA	Finalize Damages Phase document review memorandum and circulate to EB, HM, CHH, JHA, and TT (0.8); attend teleconference with EB, TT, HM, and JHA to discuss and assign roles for analysis and review in support of same (0.5); correspond with MV about review project (0.2); continue analysis of additional Rhodium documents to identify information in support of damages case (2.9).	4.40	350.00	1,540.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/13/25	HM	Attend teleconference with EB, TT, ASA and JHA regarding status and action items in support of further document review (0.5); prepare for (0.1) and attend (0.9) teleconference with MV, EB, PS, JS, TB, CS, PB, SR, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal.	1.50	700.00	1,050.00
3/13/25	TT	Attend teleconference with EB, HM, ASA and JHA regarding status and action items in support of further Rhoidum document review (0.5); analyze and summarize additional Rhodium materials for EB in support of damages claim (8.0).	8.50	525.00	4,462.50
3/13/25	MV	Attend teleconference with EB, PS, JS, TB, CS, PB, HM, SR, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal (0.9); attend teleconference with EB regarding high priority action items including fellow management (0.2); assess and follow-up with fellows and attorneys regarding ongoing document assignments and action items (0.2).	1.30	425.00	552.50
3/14/25	EB	Prepare for (0.5) and attend portion of teleconference to advise HM and MV regarding damages case document review and case management (0.6); analyze current privilege log materials (0.4); correspond with PB, MV, NC, and ASA regarding family analysis of same (0.2); review correspondence from BA and analyze issues and record relating to appellate waiver arguments (1.0); review and respond to correspondence from BA regarding supplemental record designations (0.1).	2.80	1250.00	3,500.00
3/14/25	BA	Continue researching and reviewing issues for record designation and motion to strike portions of Whinstone's designations, and correspond with CH and JH regarding research and documents for same.	1.90	1200.00	2,280.00
3/14/25	JS	Prepare for (0.5) and attend (0.4) call regarding [redacted] exit financing questions; continue evaluating next steps for damages case and possible Whinstone settlement (0.9).	1.80	1025.00	1,845.00
3/14/25	SR	Review and analyze documents to be added to memorandum summarizing factual research relating to damages complaint.	2.40	750.00	1,800.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/14/25	TB	Review docket and document designations and plan regarding responsive designations (5.0); plan regarding research on waiver issues (0.9).	5.90	1200.00	7,080.00
3/14/25	CS	Continue reviewing and analyzing case law in preparation for composing response to Whinstone and Riot's answer to or motion to dismiss damages action; continue drafting memorandum regarding the same (6.0).	6.00	850.00	5,100.00
3/14/25	CHH	Provide documents to BA in support of additional designations to record on appeal (0.5); review and analyze Whinstone's designations and pull pleadings relating to same (1.0).	1.50	350.00	525.00
3/14/25	NC	Update and circulate updated privilege log analysis for attorney review.	.20	350.00	70.00
3/14/25	JHA	Continue reviewing and analyzing assigned Rhodium documents in support of damages case (2.1); compile exhibits and supporting materials for motion to strike Whinstone designations (1.0).	3.10	350.00	1,085.00
3/14/25	ASA	Analyze past briefing at request of PB and EB to confirm pertinent information about Immersion Systems.	2.10	350.00	735.00
3/14/25	HM	Confer with HM, EB, and MV regarding damages case document review and case management.	1.70	700.00	1,190.00
3/14/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	7.80	525.00	4,095.00
3/14/25	MV	Confer with HM and EB regarding damages case document review and case management (1.7); review damages case review memorandum and related documents (1.0); correspond with team regarding ongoing oversight of fellows regarding document review and assign batches for review (0.3); review and respond to correspondence related to privilege log (0.5); conduct document review in support of damages case and begin summary of findings regarding same (3.5).	7.00	425.00	2,975.00
3/15/25	TB	Research regarding waiver and planning regarding response to waived issues.	2.10	1200.00	2,520.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/15/25	CS	Continue analyzing case law and drafting memorandum in support of adversary proceeding in preparation for responding to answers or motions to dismiss.	2.90	850.00	2,465.00
3/16/25	VO	Review and analyze [redacted], and [redacted] documents and summaries of key information relating to same.	1.60	1025.00	1,640.00
3/16/25	PS	Review documents provided and curated by J. Stokes for purposes of assessing key strategic issues pertaining to damages claim, potential settlement, and proposed plan terms.	4.50	1450.00	6,525.00
3/16/25	EB	Confer with JS regarding high priority action items and assignments including searching in support of objection to SAFE claim, approval for fraudulent inducement amendment, and appellate waiver research (0.5); analyze materials relating to support for fraudulent inducement claim (3.5); correspond with BA, TB, MS, and JS regarding analysis of same (1.6); correspond with CHH regarding systems access and related action items (0.1).	5.70	1250.00	7,125.00
3/16/25	BA	Correspond with EB and MS regarding issues related to fraudulent inducement claim (0.3); continue analyzing issues for and drafting filings for response to Whinstone's designation of record materials (0.5).	.80	1200.00	960.00
3/16/25	JS	Confer with EB regarding high priority action items and assignments including searching in support of objection to SAFE claim, approval for fraudulent inducement amendment, and appellate waiver research (0.5); review complaint and existing research in connection with same (0.4).	.90	1025.00	922.50
3/16/25	TB	Conduct further legal research regarding waiver via agreement and failure to raise.	5.10	1200.00	6,120.00
3/16/25	CS	Continue research in support of response to Whinstone and Riot answers to or motions to dismiss damages action and drafting memorandum regarding same.	3.10	850.00	2,635.00
3/16/25	MS	Analyze documents and materials regarding fraudulent inducement issue.	2.70	1100.00	2,970.00
3/16/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	6.30	525.00	3,307.50

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Date	Tkpr	Description	Hours	Rate	Amount
3/17/25	VO	Review documents provided and curated by JS for purposes of assessing key strategic issues pertaining to damages claim, potential settlement, and proposed plan terms (4.8); confer with JS and EB regarding damages and other high-priority items (0.5).	5.30	1025.00	5,432.50
3/17/25	PS	Review documents provided and curated by JS for purposes of assessing key strategic issues pertaining to damages claim, potential settlement, and proposed plan terms.	4.30	1450.00	6,235.00
3/17/25	EB	Review and respond to team correspondence regarding discovery and document-related action items (0.2); evaluate high priority damages-related tasks (0.5); correspond with ASA regarding prioritization of litigation fellow tasks (0.1); analyze additional materials to prepare for (1.3) and confer with JS and MS regarding fraudulent inducement analysis (0.7); correspond with HM regarding and provide additional information to MS in support of same (0.1); review updates from TT, confer with Stris Team regarding background, and advise TT regarding further Rhodium document review and analysis (0.2); confer with VO and JS regarding Building D analysis and high priority action items (0.5); review update from TB regarding appellate record designations and correspondence from BA regarding next steps (0.1); review and analyze Building D correspondence, materials, and legal research from co-counsel and determine next steps in support of development of proof regarding same (2.0); attend teleconference with HM regarding factual memorandum assessing same (0.2); review and provide supporting materials and further instructions to HM (0.3); begin reviewing Riot and Whinstone filings moving to withdraw the reference and dismiss damages complaint (1.0).	7.20	1250.00	9,000.00
3/17/25	BA	Correspond with CH and with JH regarding status of analysis relevant to record designations for appeal (0.2); begin reviewing transcripts as relevant to both supplemental designations and motion to strike Whinstone's designations (1.5).	1.70	1200.00	2,040.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/17/25	JS	Confer with EB and MS regarding fraudulent inducement analysis (0.7); correspond with EB and MS regarding same (0.2); confer with VO and EB regarding Building D and other high priority issues (0.5); review and evaluate Riot and Whinstone responses to damages complaint (2.5); review documents in connection with SAFE analysis related to Whinstone settlement issues (1.2); review SAFE claim objection (1.0); evaluate high priority next steps in connection with damages complaint (1.4); review and evaluate draft motion to return bond in Milam County (0.8).	8.30	1025.00	8,507.50
3/17/25	TB	Research regarding waiver of arguments by contract and judicial waiver (4.6); review documents and advise regarding document designations for appeal (0.6).	5.20	1200.00	6,240.00
3/17/25	CHH	Continue assisting BA with designations for bankruptcy appeal (0.4); assist JS and LS with targeted searching and analysis for Whinstone settlement (0.4); organize and provide documents to various attorneys per EB request (0.1).	.90	350.00	315.00
3/17/25	MS	Analyze documents and expert reports regarding fraudulent inducement issue (2.3); conduct legal research regarding same (4.9); attend teleconference with EB and JS regarding fraudulent inducement analysis (0.7).	7.90	1100.00	8,690.00
3/17/25	JHA	Review Phase 1 hearing transcripts and update internal tracking memorandum with exhibits offered and admitted in support of appellate motion practice as directed by BA (1.3); continue reviewing assigned materials in support of damages phase (2.5).	3.80	350.00	1,330.00
3/17/25	PB	Analyze Whinstone motions to dismiss and to withdraw reference.	.80	850.00	680.00
3/17/25	ASA	Continue review and analysis of assigned Rhodium documents for information for damages case.	2.60	350.00	910.00
3/17/25	HM	Begin reviewing documents and drafting Building D analysis (1.3); confer with EB about Building D analysis (0.2).	1.50	700.00	1,050.00
3/17/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	10.50	525.00	5,512.50
3/17/25	LS	Perform targeted search, review of search results, and compilation of findings for attorney J. Stokes.	7.70	625.00	4,812.50

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Date	Tkpr	Description	Hours	Rate	Amount
3/18/25	VO	Review settlement term sheet and emails with team regarding same (0.4); review and analyze omnibus claim objection and underlying SAFE documents, including reviewing EB redlines to same (1.4); confer with JS regarding same (0.3); attend videoconference with co-counsel and client representatives (0.8).	2.90	1025.00	2,972.50
3/18/25	PS	Review documents provided and curated by JS for purposes of assessing key strategic issues pertaining to damages claim, potential settlement, and proposed plan terms.	4.20	1450.00	6,090.00
3/18/25	EB	Continue reviewing and analyzing Riot and Whinstone motions and ensure staffing and coverage to respond to same (1.2); advise NC and ASA correspond with BA, JS, NC, and ASA regarding preparation of opposition papers responding to same and potential motion to strike jury demand (0.2); review updates from TT regarding document review and analysis and advise regarding same (0.1); correspond with LS regarding additional targeted searching (0.1); attend teleconference with LS regarding same (0.4); prepare for (0.2) and attend (0.4) teleconference with litigation fellows and TT regarding review and matter status, client instructions, and prioritization of non-extended deadline-related tasks; attend teleconference with BA regarding status and high priority action items (0.2); review term sheet (0.1); propose revisions to term sheet including to address intellectual property issues in consultation with BA and JS (0.5); correspond with BA, JS, and co-counsel and review further correspondence regarding further revisions to same (0.1); review update from LS and correspond with JS, LS, and CHH regarding next steps in support of targeted SAFE searches and review (0.1); review and analyze additional Building D materials and further instruct HM regarding analysis of same (0.2); analyze and propose revisions to SAFE claim objection and correspond with JS regarding same (2.5); attend portion of checkpoint teleconference with BA, JS, client and co-counsel (0.7); advise associates and litigation fellows regarding damages case stand down and status memorialization (0.2); attend teleconference with JS, client and co-counsel to discuss SAFE issues (1.5); consult with JS regarding resulting action items including high priority research and assess staffing for same (0.1).	8.80	1250.00	11,000.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/18/25	BA	Review draft term sheet from P. Tomasco and correspond with JS, EB, and VO regarding potential revisions to same (0.2); confer with EB regarding draft term sheet (0.2); confer with EB and JS regarding potential issues to flag in term sheet (0.5); continue reviewing record materials to prepare supplemental designations of record and motion to strike, correspond with JH regarding exhibit list, correspond with CH and CS regarding potential filings for designation, and convey draft record designations to litigation team for input (4.6); participate in teleconference with client, bankruptcy counsel, and litigation team (0.8).	6.20	1200.00	7,440.00
3/18/25	JS	Evaluate SAFE issues in connection with Whinstone settlement (2.3); attend weekly touchpoint call (0.8); attend call with QE, SMLLP, and Province teams regarding SAFE issues in connection with Whinstone settlement (1.5); further conversation with EB regarding same (0.1).	4.70	1025.00	4,817.50
3/18/25	TB	Continue waiver research.	5.90	1200.00	7,080.00
3/18/25	CHH	Assist BA with additional designations for appeal (0.5); teleconference with EB, HM, JHA, and ASA regarding case updates and high priority action items (0.4); summarize LS research findings regarding SAFEs for EB and JS review (0.3).	1.20	350.00	420.00
3/18/25	NC	Assist ASA with materials in support of responses to Riot and Whinstone motions.	.40	350.00	140.00
3/18/25	MS	Conduct further research and analysis regarding fraudulent inducement.	9.30	1100.00	10,230.00
3/18/25	JHA	Finish reviewing Phase 1 hearing transcripts to update and qc internal tracking memorandum with exhibits offered and admitted in support of appellate motion practice as directed by BA (2.5); attend teleconference with EB, HM, CHH, and ASA regarding case updates and high priority action items (0.4).	2.90	350.00	1,015.00

Stris & Maher LLP

Invoice # 14517 April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/18/25	ASA	Prepare materials for Rhodium's responses to Riot's Motion to Dismiss and Motion to Withdraw Reference (0.8); prepare materials for Rhodium's responses to Whinstone's Motion to Dismiss and Motion to Withdraw Reference (0.8); correspond with EB regarding Building D materials and information (0.2); teleconference with EB, HM, JHA, and CHH regarding case updates and high priority action items (0.4); record detailed update of document review efforts to facilitate reference by attorneys (0.3).	2.50	350.00	875.00
3/18/25	HM	Continue drafting Building D memorandum (4.1); teleconference with EB, JHA, CH, and ASA regarding case updates and high priority action items (0.4).	4.50	700.00	3,150.00
3/18/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim (7.9); attend portion of teleconference with EB, HM, JHA, CH and ASA regarding case updates and high priority action items (0.2); assist HM in the identification of Building D documents for detailed timeline (0.8); amend summary and analysis of Building D documents for detailed timeline (0.2).	9.10	525.00	4,777.50
3/18/25	LS	Telephone call with attorney E. Brannen to discuss high priority targeted search requests (0.4) targeted search, review of search results, and compilation of findings relating to Temple for attorney EB (1.6); targeted search, review of search results, and compilation of findings related executed Building D contracts for EB, JS, and HM (5.6).	7.60	625.00	4,750.00
3/19/25	VO	Confer with PS and JS regarding key strategic issues.	.50	1025.00	512.50
3/19/25	PS	Review documents provided and curated by J. Stokes for purposes of assessing key strategic issues pertaining to damages claim, potential settlement, and proposed plan terms (3.6); confer with JS and VO regarding same (0.5).	4.10	1450.00	5,945.00

Stris & Maher LLP

Invoice # 14517 April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/19/25	EB	Assess status and high priority action items in support of Whinstone settlement and SAFE issues (1.0); attend teleconference with TB regarding investor priority claims and research (0.2); review and analyze initial research from P. Tomasco (0.3); revise objections to SAFE claim to incorporate edits from VO (0.2); continue assessing strategic issues (0.8); correspond with patent prosecution counsel regarding status of pending patent applications (0.1); advise associates and TT regarding status and high priority action items (0.4); assess further documents located by LS (1.0); attend teleconference with TT regarding analysis of documents in support of settlement (0.2); confer with BA regarding appeal status and coverage of non-stayed deadlines (0.2); review BA and JS comments and propose further revisions to term sheet (0.6); correspond with co-counsel regarding same (0.1).	5.10	1250.00	6,375.00
3/19/25	BA	Review revisions to term sheet and convey suggested edits to JS and EB (0.3); correspond with P. Tomasco regarding upcoming deadlines and confer with EB regarding appeal deadlines and term sheet (0.2); review draft motion to approve settlement and convey suggested edits to EB and JS (0.4); review initial admitted exhibit list from JH, correspond with JH regarding revisions to same, and correspond with HM regarding review and revision of same (0.4).	1.30	1200.00	1,560.00
3/19/25	JS	Confer with PS and VO regarding key strategic issues.	.50	1025.00	512.50
3/19/25	TB	Confer with E. Brannen regarding priority of appeal issues and issues regarding investor interest in bankruptcy (0.2); Plan research and research regarding bankruptcy rules regarding investor interest (5.4).	5.60	1200.00	6,720.00
3/19/25	MS	Conduct legal research regarding fraudulent inducement issue (1.4); review and analyze [redacted] complaint and research and analyze issues as requested by EB and JS in support of settlement (2.5).	3.90	1100.00	4,290.00
3/19/25	HM	Conduct research and draft notice of withdrawal as counsel for HM.	1.10	700.00	770.00
3/19/25	TT	Analyze and summarize third party materials for EB in support of potential Whinstone settlement.	6.50	525.00	3,412.50

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Invoice # 14517 April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/20/25	VO	Attend teleconference with team regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms (0.8); confer with PS and JS regarding key strategic issues (0.8).	1.60	1025.00	1,640.00
3/20/25	PS	Review documents provided and curated by JS for purposes of assessing key strategic issues pertaining to damages claim, potential settlement, and proposed plan terms (3.1); confer with VO and JS regarding same (0.8).	3.90	1450.00	5,655.00
3/20/25	EB	Review client and counsel initial comments on motion to assume, propose further revisions, and correspond with client and co-counsel regarding same (0.9); prepare for (0.5) and lead (0.8) Stris team meeting regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms; review updates from TT regarding further analysis (0.2); correspond with JS and TT regarding next steps in support of same (0.1); continue analyzing SAFE issues, further revise, and correspond with co-counsel regarding objection to SAFE claim (2.6); attend portion of teleconference with JS, clients, and co-counsel regarding same (0.5); review and respond to further team correspondence and additional SAFE discovery- related correspondence (0.3).	5.90	1250.00	7,375.00
3/20/25	BA	Correspond with EB regarding term sheet (0.1); participate in portion of teleconference regarding strategy for plan and SAFE issues (0.5); correspond and confer with HM regarding exhibit list for appeal (0.3); attend portion of teleconference with EB, TB, JS, VO, CS, PB, SR, HM, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms (0.5).	1.40	1200.00	1,680.00

Invoice # 14517 April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/20/25	JS	Continued work on SAFE issues in connection with Whinstone settlement (3.8); attend call with client and counsel teams regarding same (1.1); review and evaluate further correspondence from SAFEs regarding document requests related to litigation team (1.3); review and evaluate issues affecting Debtors in connection with SAFE subpoena of Imperium (0.9); attend teleconference with EB, BA, TB, VO, CS, PB, SR, HM, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	7.90	1025.00	8,097.50
3/20/25	SR	Attend teleconference with EB, BA, TB, JS, VO, CS, PB, HM, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	.80	750.00	600.00
3/20/25	TB	Legal research regarding subordination of claims (5.1); Attend teleconference with EB, BA, JS, VO, CS, PB, SR, HM, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms. (0.8).	5.90	1200.00	7,080.00
3/20/25	CS	Attend teleconference with EB, BA, TB, JS, VO, PB, SR, HM, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	.80	850.00	680.00
3/20/25	CHH	Attend teleconference with EB, BA, TB, JS, VO, CS, PB, SR, HM, MV, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	.80	350.00	280.00
3/20/25	JHA	Attend teleconference with EB, BA, TB, JS, VO, CS, PB, SR, HM, MV, CHH and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	.80	350.00	280.00
3/20/25	PB	Attend teleconference with EB, BA, TB, JS, VO, CS, PB, SR, HM, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	.80	850.00	680.00

Stris & Maher LLP

Invoice # 14517 April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/20/25	ASA	Attend teleconference with EB, BA, TB, JS, VO, CS, PB, SR, HM, MV, CHH and JHA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms (0.8); assist HM with preparation of notice of withdrawal as counsel (1.0).	1.80	350.00	630.00
3/20/25	HM	Create Exhibit List for Appeal document for BA (6.8); attend teleconference with EB, BA, TB, JS, VO, CS, PB, SR, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms (0.8).	7.60	700.00	5,320.00
3/20/25	TT	Analyze and summarize additional Rhodium (5.0) and SEC (4.0) materials for EB in support of potential Whinstone settlement.	9.00	525.00	4,725.00
3/20/25	MV	Attend teleconference with EB, BA, TB, JS, VO, CS, PB, SR, HM, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	.80	425.00	340.00
3/21/25	VO	Emails and confer with team regarding preparation of correspondence to counsel for SAFE AHG regarding Whinstone settlement, and analyze issues relating to same.	2.20	1025.00	2,255.00

Stris & Maher LLP

Invoice # 14517 April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/21/25	EB	Attend teleconference with JS regarding high priority action items including response to discovery requests from counsel for SAFEs (0.7); review proposed final motion, term sheet, and proposed order (0.3); attend teleconference with client and co-counsel to discuss same (0.8); correspond with prosecution counsel (0.1); correspond with and advise CS regarding research in support of opposition to SAFE discovery requests (0.2); continue analyzing SAFE discovery issues (0.3); correspond with TT regarding revisions to memorandum (0.1); revise correspondence to counsel for SAFEs and correspond with BA, JS, co-counsel and clients regarding further revisions to same (0.7); review privilege research and memorandum from co-counsel (0.5); revise, finalize, and send response to most recent correspondence responding to SAFE discovery demands including agreed upon confidential projections document (0.6); begin analyzing materials from prosecution counsel (1.0); review proposed press release and correspondence from co-counsel regarding same (0.1); review Stris team correspondence including regarding SAFE research updates from TB (0.2).	5.60	1250.00	7,000.00
3/21/25	BA	Correspond with CS and P. Tomasco regarding appeal designations (0.2); review correspondence from K. Yang, review draft motion for protective order, and correspond with team regarding potential responses to SAFE counsel (0.4).	.60	1200.00	720.00
3/21/25	JS	Evaluate follow-on issues related to the Whinstone settlement and its impacts on potential plan confirmation (2.7); review, evaluate, and respond to discovery issues related to SAFE requests as to Stris and Lehotsky fees (2.0); prepare discovery correspondence related to SAFE involvement in Whinstone mediation (2.8); confer with EB regarding high priority action items including response to discovery requests regarding Stris and LKC fees in the Whinstone litigation (0.7).	8.20	1025.00	8,405.00
3/21/25	TB	Legal research regarding contracts potentially bearing upon Whinstone settlement (4.4); draft quick summary regarding assessment of same (0.6).	5.00	1200.00	6,000.00

Stris & Maher LLP

Invoice # 14517 April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/21/25	CS	Review and analyze case law in preparation for responding to SAFE Committee discovery requests and begin drafting memorandum regarding the same.	5.50	850.00	4,675.00
3/21/25	TT	Analyze and summarize additional SEC materials for EB in support of Whinstone settlement issues.	1.50	525.00	787.50
3/22/25	EB	Review, analyze, and correspond with P. Tomasco, JS regarding further correspondence to counsel for SAFEs (0.2); review publicly available materials and update ERCOT expert regarding matter status (0.1); continue evaluating settlement implications with respect to SAFE and additional third party asserted claims and positions (1.0).	1.30	1250.00	1,625.00
3/22/25	JS	Further evaluate interaction of SAFEs with Whinstone settlement.	1.90	1025.00	1,947.50
3/23/25	EB	Review correspondence from SAFE counsel and correspond with JS and co-counsel regarding response to same (0.2); review drafts and correspondence from BA for upcoming non-stayed appellate filing and correspond with BA, JS, and CS regarding potential revisions to same (0.6).	.80	1250.00	1,000.00
3/23/25	BA	Correspond with P. Tomasco and with CS and team regarding appeal designations and related filings (0.3); review new proof of claim from N. Cerasuolo (0.1); review correspondence with SAFE AHGs (0.2).	.60	1200.00	720.00
3/23/25	JS	Further discovery correspondence regarding SAFE interaction with Whinstone settlement issues.	1.10	1025.00	1,127.50
3/24/25	EB	Prepare for (0.2) and attend (0.4) teleconference with prosecution counsel; continue analyzing related materials and correspond with prosecution counsel and clients regarding potential interim action items and questions (1.0); review further correspondence from mediator and SAFE counsel and correspond with JS and P. Tomasco regarding response to same (0.2); propose revisions to non-abated appellate filing and correspond with BA, JS, and CS regarding same (0.2).	2.00	1250.00	2,500.00
3/24/25	BA	Correspond with CS and EB regarding appeal designations, review and revise same, correspond with P. Tomasco regarding same, correspond with M. Moore and opposing counsel regarding filing of same and need for stipulation to abate further deadlines, and approve filing of same.	1.10	1200.00	1,320.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/24/25	JS	Continued work regarding SAFE interaction with Whinstone settlement and related next steps.	4.90	1025.00	5,022.50
3/24/25	CS	Review, revise, finalize, and file appellees' designations to record for appeal to district court.	1.20	850.00	1,020.00
3/24/25	CHH	Assist JS with research and collection of documents from discovery database.	.20	350.00	70.00
3/25/25	EB	Attend portion of checkpoint teleconference with BA, JS, clients, and co-counsel regarding status and high priority action items including with respect to IP (0.2); review and respond to correspondence from JS regarding client instructions and update MS and TB regarding same (0.1).	.30	1250.00	375.00
3/25/25	JS	Continued work on interaction of SAFE with Whinstone settlement and related issues (2.3); attend weekly touchpoint call (0.4).	2.70	1025.00	2,767.50
3/25/25	CS	Continue reviewing and analyzing case law in preparation for responding to SAFE discovery concerning Whinstone settlement and continue drafting memorandum regarding the same.	3.30	850.00	2,805.00
3/25/25	JHA	Prepare draft stipulation to abate deadlines at BA request.	2.20	350.00	770.00
3/26/25	EB	Attend teleconference with W. Thompson regarding expert report and analysis inquiry from [redacted] (0.1); correspond with BA, JS, ASA, JHA, and W. Thompson regarding response to same (0.2); confer with [redacted] and [redacted] regarding high priority action items including upcoming renewal deadline for document vendor (0.1); correspond with Stris team members regarding timing and correspondence with vendor regarding same (0.1).	.50	1250.00	625.00
3/26/25	BA	Review expert reports and correspond with EB and JS regarding inquiry from [redacted] (0.5); revise proposed stipulation to abate appeal deadlines, correspond with P. Tomasco, and advise JH regarding further revisions to same (0.4).	.90	1200.00	1,080.00
3/26/25	JHA	Edit draft Stipulation to Abate Deadlines at BA request.	.10	350.00	35.00
3/27/25	EB	Correspond with Stris team and vendor regarding document hosting renewal options.	.10	1250.00	125.00

Stris & Maher LLP

Invoice # 14517 April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/28/25	EB	Correspond with vendor to reiterate time-sensitive request for document hosting platform renewal options (0.1); communicate with Stris team members regarding assessment of data hosting size and anticipated needs (0.1).	.20	1250.00	250.00
3/28/25	ASA	Analyze data hosting needs and correspond with vendor regarding data usage at request of EB ahead of renewal deadline.	.40	350.00	140.00
3/31/25	PS	Review mediation appointment order (0.1); confer with team regarding same (0.1).	.20	1450.00	290.00
3/31/25	EB	Correspond with Stris team and vendor and assign MV to assess data hosting size and anticipated needs and pricing options (0.2); attend teleconference with MV and review update from MV regarding status of discussions (0.2); update [redacted] regarding same (0.1).	.50	1250.00	625.00
3/31/25	BA	Review mediation appointment order (0.1); correspond with PS, JS, and EB regarding plan mediation and upcoming hearings and confer with EB regarding same (0.2).	.30	1200.00	360.00
3/31/25	CHH	Correspond with vendor regarding discovery platform usage, issues, and needs in advance of potential renewal.	.30	350.00	105.00
3/31/25	JHA	Update files and attend to detailed tracking regarding recent filings and case developments.	1.00	350.00	350.00
3/31/25	MV	Correspond with vendor regarding options for potential contract renewal (0.3); obtain options from separate vendor and correspond regarding potential data transfer needs (0.2); analyze and correspond with EB regarding options (0.3); attend teleconference with MV regarding same (0.2).	1.00	425.00	425.00
		TOTAL PROFESSIONAL SERVICES			**$ 493,202.50**

Invoice # 14517 April 23, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	23.80	1,450.00	34,510.00
Elizabeth Brannen	EB	Partner	61.50	1,250.00	76,875.00
Bridget Asay	BA	Partner	27.60	1,200.00	33,120.00
Tillman Breckenridge	TB	Partner	47.90	1,200.00	57,480.00
Matthew Seligman	MS	Partner	23.80	1,100.00	26,180.00
Victor O'Connell	VO	Partner	18.90	1,025.00	19,372.50
John Stokes	JS	Partner	73.90	1,025.00	75,747.50
Colleen Smith	CS	Associate	44.80	850.00	38,080.00
Peter Brody	PB	Associate	4.00	850.00	3,400.00
Sarah Rahimi	SR	Associate	8.70	750.00	6,525.00
Helen Marsh	HM	Associate	21.90	700.00	15,330.00
Lisa Sherrod	LS	Lead Discovery Assoc	15.30	625.00	9,562.50
Tanya Tice	TT	Discovery Associate	132.70	525.00	69,667.50
Monica Viramontes	MV	Sr Paralegal	11.90	425.00	5,057.50
Andrew Atsalis	ASA	Fellow	26.30	350.00	9,205.00
Cynthia Huang	CHH	Fellow	7.70	350.00	2,695.00
Nicholas Capalbo	NC	Fellow	3.10	350.00	1,085.00
Jaida Hodge-Adams	JHA	Fellow	26.60	350.00	9,310.00
Total			**580.40**		**$ 493,202.50**

Stris & Maher LLP

Invoice # 14517 April 23, 2025

EXPENSES ADVANCED

Date	Task	Description	Amount
2/11/25		BA airfare for mediation.	1,168.35
2/17/25		VO Airfare to Dallas for mediation.	560.49
2/19/25		BA transportation while in Dallas for mediation.	82.64
2/19/25		VO transportation for mediation.	161.63
2/20/25		BA transportation while in Dallas for mediation.	88.48
2/20/25		VO lodging in Dallas for mediation.á	651.89
2/20/25		VO airfare for mediation.	216.99
2/21/25		BA lodging for mediation in Dallas.	1,466.64
2/21/25		BA airpot parking for mediation.	36.00
3/05/25		CS pro hac application fee.	100.00
3/05/25		PS pro hac application fee.	100.00
3/05/25		JS pro hac application fee.	100.00
3/05/25		BA pro hac application fee.	100.00
3/17/25		Setec invoice - forensic investigation.	2,776.30
4/01/25		Logikcull Discovery Solutions (April 2025).	2,646.00
		TOTAL EXPENSES ADVANCED	**$ 10,255.41**
		TOTAL THIS INVOICE	**$ 503,457.91**

Stris & Maher LLP

Invoice # 14517 April 23, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14366	1/13/25	132,202.25	111,327.25	20,875.00
14459	2/21/25	840,030.97	713,078.47	126,952.50
14486	3/28/25	754,873.12	.00	754,873.12
		Previous Balance		$ 902,700.62
		Balance Due This Invoice		$ 503,457.91
		TOTAL BALANCE DUE		**$ 1,406,158.53**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 754,873.12	$ .00	$ 126,952.50	$ 20,875.00	$ .00	$ 902,700.62

Stris

April 23, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14532
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through March 31, 2025

RE: Retention and Fee Applications

Total Professional Services	$ 11,102.50
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 11,102.50**
Previous Balance	$ 19,149.50
TOTAL BALANCE DUE	**$ 30,252.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14532 April 23, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
3/05/25	EB	Begin working on February monthly fee statement.	.50	1250.00	625.00
3/06/25	VO	Attention to process for quarterly fee application (0.2); prepare certificate of no objection (0.1).	.30	1025.00	307.50
3/11/25	EB	Work on monthly fee statement (0.4); advise NC regarding same (0.1).	.50	1250.00	625.00
3/12/25	NC	Assist EB with portions of monthly fee statement.	1.20	350.00	420.00
3/27/25	EB	Continue working on portion of monthly fee statement.	1.90	1250.00	2,375.00
3/28/25	EB	Continue preparing monthly fee statement.	2.80	1250.00	3,500.00
3/31/25	EB	Continue preparing monthly fee statement.	2.60	1250.00	3,250.00
		TOTAL PROFESSIONAL SERVICES			**$ 11,102.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	8.30	1,250.00	10,375.00
Victor O'Connell	VO	Partner	.30	1,025.00	307.50
Nicholas Capalbo	NC	Fellow	1.20	350.00	420.00
Total			**9.80**		**$ 11,102.50**

TOTAL THIS INVOICE **$ 11,102.50**

Stris & Maher LLP

Invoice # 14532 April 23, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14381	1/13/25	6,285.00	5,028.00	1,257.00
14472	2/21/25	8,575.00	6,860.00	1,715.00
14499	3/28/25	16,177.50	.00	16,177.50

Previous Balance	$ 19,149.50
Balance Due This Invoice	$ 11,102.50
TOTAL BALANCE DUE	**$ 30,252.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 16,177.50	$ .00	$ 1,715.00	$ 1,257.00	$ .00	$ 19,149.50

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

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

STRIS & MAHER LLP'S EIGHTH MONTHLY FEE STATEMENT
FOR THE PERIOD APRIL 1, 2025, THROUGH APRIL 30, 2025

Stris & Maher LLP ("Stris & Maher") submits, pursuant to the Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the "Interim Compensation Order") (ECF No. 264) entered on October 14, 2024, this monthly fee statement for the payment of interim compensation rendered and reimbursement of expenses incurred during the period April 1, 2025, through April 30, 2025 (the "Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $63,240.00 (80% of the services rendered), plus $7,530.00 (100% of the interim expenses incurred). *See* Interim Compensation Order at ¶ 1(a). Summaries of the fees and expenses are attached as Exhibits 1, 2, and 3. Invoices reflecting detailed time entries are attached hereto as Exhibit 4.

[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), 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.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall serve within 14 days after delivery of the Monthly Fee Statement a written notice, via email, upon Stris & Maher and each of the other Fee Notice Parties (as listed below) (the "Written Notice"). The Written Notice shall set forth with reasonable detail the nature of the objection and the amount at issue. If the parties are unable to reach a resolution of the objection within 14 calendar days, the objecting party shall file its objection (the "Objection") with this Court within 3 business days and serve such Objection on Stris & Maher and each of the other Fee Notice Parties. See Interim Compensation Order ¶ 1(c).

The Fee Notice Parties as defined in the Interim Compensation Order are:

a. Rhodium Enterprises, Inc., Attn: Charles Topping (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 2617 Bissonnet Street, Suite 234, Houston, Texas 77005;

b. Debtors' Bankruptcy Counsel, c/o Quinn Emanuel Urquhart & Sullivan, LLP, Attn: Patricia B. Tomasco (pattytomasco@quinnemanuel.com); Razmig Izakelian (razmigizakelian@quinnemanuel.com), Alain Jaquet (alainjaquet@quinnemanuel.com), and Joanna D. Caytas (joannacaytas@quinnemanuel.com), 700 Louisiana, Suite 3900, Houston, Texas 77002;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (mrobinson@provincefirm.com); David Dunn (ddunn@provincefirm.com); Kirsten Lee (klee@province.com); and Andrew Popescu (apopescu@provincefirm.com), 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074;

d. Galaxy Digital, LLC, in its capacity as DIP Agent, c/o Orrick, Herrington & Sutcliffe LLP, Ryan C. Wooten (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 51 West 52nd Street, New York, New York 10019;

e. Counsel or proposed counsel to any statutory committee appointed in these Chapter 11 Cases; and

f. United States Trustee, Ha Minh Nguyen (ha.nguyen@usdoj.gov), 515 Rusk, Suite 3516, Houston, Texas 77002.

If no objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Stris & Maher an amount equal to 80% of the fees and 100% of the expenses listed herein, or if an objection is timely served, such percentage of fees and expenses that are not subject to an objection, as stated in the Interim Compensation Order.

Respectfully submitted this 22nd day of May, 2025.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
Patricia B. Tomasco (SBN 01797600)
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Cameron Kelly (SBN 24120936)
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-and-

STRIS & MAHER LLP

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408 W. 11th Street, 5th Floor
Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on May 22, 2025, a true and correct copy of the foregoing Monthly Fee Statement was served through the Court's Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco
Patricia B. Tomasco

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	52.3	$55,720.00	$44,576.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	2.7	$3,037.50	$2,430.00
007	Retention and Fee Applications	21.4	$20,292.50	$16,234.00
Total		76.4	$79,050.00	$63,240.00

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	2.10	$2,625.00
Victor O'Connell	Partner	2012	1,025.00	.30	$307.50
Andrew Atsalis	Litigation Fellow	N/A	350.00	.30	$105.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	24.00	$30,000.00
Bridget Asay	Partner	1997	1,200.00	12.20	$14,640.00
John Stokes	Partner	2016	1,025.00	7.90	$8,097.50
Monica Viramontes	Senior Paralegal	N/A	425.00	1.50	$637.50
Andrew Atsalis	Litigation Fellow	N/A	350.00	.40	$140.00
Cynthia Huang	Litigation Fellow	N/A	350.00	.30	$105.00
Sebastian Delgado	Litigation Fellow	N/A	350.00	.40	$140.00
Jaida Hodge-Adams	Litigation Fellow	N/A	350.00	5.60	$1,960.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	9.80	$12,250.00
Victor O'Connell	Partner	2012	1,025.00	5.90	$6,047.50
Cynthia Huang	Litigation Fellow	N/A	350.00	4.40	$1,540.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	1.30	$455.00

EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
E-discovery platform fees	$7,530.00
Total	$7,530.00

EXHIBIT 4

Stris

May 14, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14560
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through April 30, 2025

RE: Midas Green Litigation

Total Professional Services	$ 3,037.50
Total Expenses Advanced	$ 7,530.00
TOTAL THIS INVOICE	**$ 10,567.50**
Previous Balance	$ 37,579.00
TOTAL BALANCE DUE	**$ 48,146.50**

Electronic Invoice

Stris & Maher LLP

Invoice # 14560 May 14, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
4/10/25	EB	Communicate with [redacted] regarding status of district court case and objection to Midas proof of claim (0.1); analyze current draft opposition to same (0.4); correspond with P. Tomasco regarding same and related action items with respect to district court (0.1).	.60	1250.00	750.00
4/15/25	EB	Communicate with CHH and ASA regarding status and analyze information in support of responding to client inquiry (0.1); correspond with [redacted], B. Rice, P. Tomasco, and D. Holzman regarding same (0.1).	.20	1250.00	250.00
4/16/25	VO	Review and revise EB declaration in support of objection to Midas Green's proof of claim.	.30	1025.00	307.50
4/16/25	EB	Confirm information (0.1) and revise declaration in support of objection to Midas Green claim (0.9); correspond with VO (0.1) and R. Harrington (0.1) regarding revisions to same.	1.20	1250.00	1,500.00
4/16/25	ASA	Collect requested documentation at request of EB to assist with drafting of declaration in support of Rhodium's objection to Midas Green's proof of claim.	.30	350.00	105.00
4/22/25	EB	Instruct ASA regarding status and action items following submission of amended objection to Midas Green proof of claim.	.10	1250.00	125.00
		TOTAL PROFESSIONAL SERVICES			**$ 3,037.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	2.10	1,250.00	2,625.00
Victor O'Connell	VO	Partner	.30	1,025.00	307.50
Andrew Atsalis	ASA	Fellow	.30	350.00	105.00
Total			**2.70**		**$ 3,037.50**

Stris & Maher LLP

Invoice # 14560 May 14, 2025

EXPENSES ADVANCED

Date	Task	Description	Amount
1/31/25		JND Discovery Invoice for January 2025.	3,765.00
3/31/25		JND Discovery Invoice for March 2025.	3,765.00
		TOTAL EXPENSES ADVANCED	**$ 7,530.00**
		TOTAL THIS INVOICE	**$ 10,567.50**

Stris & Maher LLP

Invoice # 14560 May 14, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14380	1/13/25	8,990.00	7,192.00	1,798.00
14471	2/21/25	25,380.00	21,057.00	4,323.00
14498	3/28/25	15,240.00	12,192.00	3,048.00
14530	4/23/25	28,410.00	.00	28,410.00

Previous Balance	$ 37,579.00
Balance Due This Invoice	$ 10,567.50
TOTAL BALANCE DUE	**$ 48,146.50**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 28,410.00	$ 3,048.00	$ 4,323.00	$ .00	$ 1,798.00	$ 37,579.00

Stris

May 14, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14547
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through April 30, 2025

RE: Whinstone Litigation

Total Professional Services	$ 55,720.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 55,720.00**
Previous Balance	$ 798,574.91
TOTAL BALANCE DUE	**$ 854,294.91**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Stris & Maher LLP

Invoice # 14547 May 14, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
4/01/25	EB	Correspond with MV regarding and analyze document hosting options and recommendations (0.2); correspond with Rhodium regarding same (0.1); correspond with BA and JS and review correspondence from co-counsel regarding high priority action items including motion to stay appeal deadlines (0.1); advise MV regarding correspondence with vendor and review same (0.1).	.50	1250.00	625.00
4/01/25	BA	Correspond with EB and JS regarding abatement of appeal deadlines pending settlement (0.1); revise draft proposed filing regarding same (0.4); correspond with P. Tomasco regarding further edits to same, and convey draft of same to M. Moore for review (0.1).	.60	1200.00	720.00
4/01/25	MV	Assess and negotiate vendor renewal hosting contract and cold storage options including with alternative vendor (1.3); provide options to EB for next steps (0.2).	1.50	425.00	637.50
4/04/25	EB	Review and comment on draft settlement agreement (0.7); correspond with BA, JS, and VO regarding same (0.1).	.80	1250.00	1,000.00
4/04/25	BA	Review, analyze, and propose edits on draft settlement agreement (2.6); convey same to JS and EB for further review (0.1); review comments from JS, EB, and W. Thompson (0.1); convey edits and comments on draft settlement agreement from Stris team to P. Tomasco (0.2).	3.00	1200.00	3,600.00
4/07/25	BA	Review witness and exhibits lists, and exhibits, for settlement hearing (0.5); correspond with JS regarding settlement hearing (0.2).	.70	1200.00	840.00
4/08/25	EB	Review update from BA regarding client checkpoint teleconference and correspond with BA and JS regarding resulting action items (0.1); communicate with [redacted] regarding upcoming license review (0.1).	.20	1250.00	250.00

Stris & Maher LLP

Invoice # 14547 May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/08/25	BA	Attend hearing on settlement approval by telephone (0.6); review order approving settlement (0.2); participate in portion of weekly client update call with [redacted] W. Thompson, and J. Cohn (0.5); correspond with JS, EB, and PS regarding status of LKC fee dispute in connection with Whinstone litigation (0.3).	1.60	1200.00	1,920.00
4/09/25	EB	Begin analyzing draft license agreement as requested by [redacted] (1.0); correspond with [redacted] and [redacted] regarding same (0.1); attend teleconference with [redacted] regarding same (0.3).	1.40	1250.00	1,750.00
4/09/25	JHA	Detailed tracking of docket updates for bankruptcy proceeding, adversary proceeding, bankruptcy appeal, and district court appeal.	1.00	350.00	350.00
4/10/25	EB	Continue analyzing and propose revisions to draft license agreement (1.9); prepare for and attend teleconference with [redacted] and [redacted] regarding same (0.9); further revise same to incorporate client feedback (0.8); correspond with [redacted] regarding additional information in support of same (0.1).	3.70	1250.00	4,625.00
4/10/25	BA	Correspond with EB, JS, and team regarding client's position on potential fee dispute.	.20	1200.00	240.00
4/10/25	JHA	Attention to detailed tracking of further docket updates for bankruptcy proceeding.	.20	350.00	70.00
4/13/25	EB	Begin reviewing and analyzing Whinstone proposed changes to license agreement.	.50	1250.00	625.00
4/13/25	BA	Review bankruptcy appeal rules and correspond with P. Tomasco, JS, and W. Thompson regarding [redacted] regarding stay of appellate deadlines.	.20	1200.00	240.00

Stris & Maher LLP

Invoice # 14547 May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/14/25	EB	Continue analyzing Whinstone proposed changes to license agreement (0.9); correspond with co-counsel and client regarding same (0.2); attend teleconference to discuss same and proposed further changes (0.8); implement same (0.4); analyze PSA confidentiality provision and related client and co-counsel correspondence (0.2); propose revisions and correspond with co-counsel and clients regarding same (0.2); review correspondence from [redacted] regarding and provide feedback on and propose revisions to additional provision of PSA concerning patent claims (0.2).	2.90	1250.00	3,625.00
4/14/25	CHH	Assist EB with fact research and information from various docket items in support of drafting of portion of PSA.	.30	350.00	105.00
4/14/25	ASA	Provide informaiton and documentation to EB as requested to support potential revisions to settlement agreement.	.40	350.00	140.00
4/15/25	EB	Prepare for and attend teleconference with JS, W. Thompson, and client contacts regarding status and high priority action items including PSA and license agreement progression and anticipated timing of Whinstone close (0.2); analyze Whinstone's proposed changes to license agreement and correspond with [redacted] P. Tomasco, and D. Holzman regarding same (1.5); attend teleconference with [redacted] P. Tomasco, and D. Holzman regarding same (0.4); revise same (0.3); review client questions and correspond with D. Holzman regarding proposed revisions to confidentiality provision of PSA (0.3); review and advise in response to inquiry from [redacted] regarding PSA disclosure of status of Midas Green claim (0.4).	3.10	1250.00	3,875.00
4/16/25	EB	Correspond with [redacted] and P. Tomasco regarding status and rescheduling of hearing on objections to updated LKC retention application.	.10	1250.00	125.00
4/16/25	JHA	Update bankruptcy docket to reflect and track recent filings and documents.	.50	350.00	175.00
4/17/25	EB	Communicate with JS regarding high priority action items including continuance (0.1); review Whinstone further changes to license agreement and correspond with clients and co-counsel regarding same (0.2).	.30	1250.00	375.00

Stris & Maher LLP

Invoice # 14547 May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/18/25	EB	Continue analyzing license agreement and confidentiality PSA provision proposed changes (0.2); attend call with client and co-counsel (1.0); prepare for (0.5) and attend (0.7) meet and confer call with co-counsel and counsel for Whinstone to discuss same; confer with D. Holtzman regarding further revisions to same (0.3); correspond with JS regarding status and high priority action items (0.1).	2.80	1250.00	3,500.00
4/18/25	JS	Review and evaluate extension request and confer with team regarding next steps on same.	.90	1025.00	922.50
4/21/25	EB	Review filings and correspondence and correspond with BA, JS, [redacted], and co-counsel regarding status and high priority action items including review of proposed revisions to PSA.	.50	1250.00	625.00
4/21/25	BA	Correspond with JS and EB regarding status of LKC fee matter, Stris retention, and Whinstone settlement (0.1); review draft motion for extension of time with respect to LKC fee matter and correspond with EB and JS regarding same (0.2).	.30	1200.00	360.00
4/22/25	EB	Correspond with [redacted], and co-counsel regarding response to Whinstone [redacted] request (0.2); attend teleconference with [redacted] regarding same and next steps (0.1); correspond with BA and JS regarding high priority action items (0.2); correspond with counsel for Whinstone regarding interim response to [redacted] and to inquire about timing on license agreement comments (0.1); review correspondence from prosecution counsel and respond regarding status of two additional applications (0.1); analyze Whinstone proposed further revisions to license agreement and correspond with D. Holzman regarding proposed further response to same (0.4); attend checkpoint teleconference with [redacted], BA, JS, and co-counsel (0.5); confer with [redacted] regarding proposed further changes on license agreement (0.1); revise and correspond with clients and P. Tomasco regarding same (0.2); correspond with counsel for Whinstone regarding same (0.1).	2.00	1250.00	2,500.00

Stris & Maher LLP

Invoice # 14547 May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/22/25	BA	Review discovery from LKC to Rhodium and correspond with JS and EB regarding same (0.2); review objection filed by SAFEs and review calendar/docket regarding status of emergency extension request, and correspond with JS and EB regarding same (0.2); participate in team call with client ([redacted]) and JS, EB, W. Thompson and J. Cohn to discuss pending matters including status of settlement documents and LKC fee dispute (0.5).	.90	1200.00	1,080.00
4/22/25	JHA	Attention to detailed tracking of further docket updates and document management for bankruptcy proceeding.	2.00	350.00	700.00
4/23/25	EB	Analyze and communicate with client contacts, co-counsel, prosecution counsel, and counsel for Whinstone regarding further revisions to license agreement and PSA confidentiality provision (1.7); instruct litigation fellows and qc confidentiality designations on patent applications (0.2); correspond with prosecution counsel, client contacts, and counsel for Whinstone regarding same (0.1); correspond with JS and BA regarding status and high priority action items including Rhodium's position on discovery and disclosure in response to new requests (0.4); review draft [redacted] declaration (0.2); confer with BA and JS regarding analysis of and potential revisions to draft [redacted] declaration (0.5).	3.10	1250.00	3,875.00
4/23/25	BA	Confer with JS and EB regarding analysis of and potential revisions to draft [redacted] declaration.	.50	1200.00	600.00
4/23/25	JS	Attend to high priority action items regarding LKC retention application (2.1); attend status conference addressing in part same (0.3).	2.40	1025.00	2,460.00
4/23/25	JHA	Attention to detailed tracking of further docket updates.	.90	350.00	315.00
4/24/25	EB	Review and analyze revised [redacted] declaration from BA (0.2); confer with BA, [redacted] regarding same (0.5); further revise same (0.3); correspond with BA and JS regarding proposed dismissal papers (0.1).	1.10	1250.00	1,375.00

Stris & Maher LLP

Invoice # 14547 May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/24/25	BA	Draft proposed declaration for [redacted] in connection with LKC fee (2.2); confer with [redacted], and EB regarding same (0.5); confer with JS and with JS and [redacted] regarding issues related to LKC fee and Whinstone settlement (0.3); review proposed dismissal papers and accompanying orders for purposes of executing Whinstone settlement and correspond with EB and JS regarding same (0.4).	3.40	1200.00	4,080.00
4/24/25	JS	Further work on high priority action items in connection with revised LKC retention application.	3.30	1025.00	3,382.50
4/24/25	SD	Assist BA with preparation of [redacted] declaration.	.40	350.00	140.00
4/25/25	EB	Attend teleconference with co-counsel and counsel for Whinstone regarding final action items in support of execution of settlement, license, and accompanying documents (0.2); review updates and correspond with PS, BA, VO, and JS regarding same and anticipated closing and dismissal timing (0.1).	.30	1250.00	375.00
4/25/25	BA	Review edits from [redacted] on draft declaration and correspond with [redacted] regarding same (0.2); confer with JS regarding status conference and LKC fee matter (0.2).	.40	1200.00	480.00
4/25/25	JS	Prepare for (0.3) and attend (0.2) status conference regarding LKC fee dispute.	.50	1025.00	512.50
4/29/25	EB	Review and confirm filing of dismissal papers and correspond with BA regarding upcoming teleconference with [redacted].	.10	1250.00	125.00
4/29/25	BA	Correspond with JS regarding status of mediation and [redacted] declaration, correspond with JS, EB, and client regarding meeting to discuss [redacted] declaration, review various court orders on filings implementing settlement, and correspond with litigation team regarding Milam County filing.	.20	1200.00	240.00
4/29/25	JS	Further work on high priority action items for LKC revised retention application.	.80	1025.00	820.00

Stris & Maher LLP

Invoice # 14547 May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/30/25	EB	Review correspondence from counsel for Whinstone regarding software and transition support (0.1); communicate with PS, BA, VO, and JS regarding status and high priority action items (0.2); prepare for and attend teleconference with [redacted] and P. Tomasco regarding response to Whinstone inquiry and review further updates regarding same (0.3).	.60	1250.00	750.00
4/30/25	BA	Review correspondence from Whinstone's counsel and client regarding transition issues and correspond with EB regarding same.	.20	1200.00	240.00
4/30/25	JHA	Attention to detailed tracking of further docket updates and document organization for bankruptcy proceeding, adversary proceeding, and district court appeal.	1.00	350.00	350.00
		TOTAL PROFESSIONAL SERVICES			**$ 55,720.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	24.00	1,250.00	30,000.00
Bridget Asay	BA	Partner	12.20	1,200.00	14,640.00
John Stokes	JS	Partner	7.90	1,025.00	8,097.50
Monica Viramontes	MV	Sr Paralegal	1.50	425.00	637.50
Andrew Atsalis	ASA	Fellow	.40	350.00	140.00
Cynthia Huang	CHH	Fellow	.30	350.00	105.00
Sebastian Delgado	SD	Fellow	.40	350.00	140.00
Jaida Hodge-Adams	JHA	Fellow	5.60	350.00	1,960.00
Total			**52.30**		**$ 55,720.00**

TOTAL THIS INVOICE **$ 55,720.00**

Stris & Maher LLP

Invoice # 14547 May 14, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14366	1/13/25	132,202.25	111,327.25	20,875.00
14459	2/21/25	840,030.97	713,078.47	126,952.50
14486	3/28/25	754,873.12	607,583.62	147,289.50
14517	4/23/25	503,457.91	.00	503,457.91
		Previous Balance		$ 798,574.91
		Balance Due This Invoice		$ 55,720.00
		TOTAL BALANCE DUE		**$ 854,294.91**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 503,457.91	$ 147,289.50	$ 126,952.50	$ .00	$ 20,875.00	$ 798,574.91

Stris

May 14, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14561
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through April 30, 2025

RE: Retention and Fee Applications

Total Professional Services	$ 20,292.50
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 20,292.50**
Previous Balance	$ 17,310.00
TOTAL BALANCE DUE	**$ 37,602.50**

Electronic Invoice

Stris & Maher LLP

Invoice # 14561 May 14, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
3/25/25	NC	Assist EB with preparation of fee statements.	1.30	350.00	455.00
4/02/25	VO	Prepare February 2025 fee application.	1.50	1025.00	1,537.50
4/10/25	VO	Work on quarterly fee application (1.0); advise CHH regarding action items and next steps in support of same (0.1).	1.10	1025.00	1,127.50
4/12/25	EB	Assess and begin working on amended retention application to clarify scope to include representing Debtors in response to objections to LKC amended retention agreement.	.50	1250.00	625.00
4/13/25	EB	Attend teleconference with [redacted] regarding status and action items in support of amended retention application (0.3); update PS, VO, and JS regarding same and correspond with VO regarding related materials (0.1); continue working on same (0.5).	.90	1250.00	1,125.00
4/14/25	VO	Emails with EB regarding amended retention application.	.20	1025.00	205.00
4/14/25	EB	Continue preparing amended retention application (0.7); correspond with PS, VO, JS, [redacted] and [redacted] regarding same (0.1).	.80	1250.00	1,000.00
4/15/25	VO	Review and revise application to update retention order (0.8); emails with team regarding same (0.2).	1.00	1025.00	1,025.00
4/15/25	EB	Revise proposed order in support of amended and clarified retention application to incorporate feedback from [redacted] (0.1); update VO regarding status and continue preparing amended application (0.7); correspond with [redacted] regarding same (0.1); further revise and prepare updated retention application and proposed order and correspond with clients and PS, VO, and JS regarding same (1.2).	2.10	1250.00	2,625.00
4/15/25	CHH	Assist VO in preparing second interim fee application.	4.20	350.00	1,470.00
4/16/25	VO	Further prepare quarterly fee application (0.8); correspond with CHH regarding same (0.1).	.90	1025.00	922.50
4/16/25	EB	Advise NC regarding preparation of portions of monthly fee statement.	.10	1250.00	125.00
4/17/25	VO	Correspond with EB regarding clarified retention application and supporting materials.	.30	1025.00	307.50

Stris & Maher LLP

Invoice # 14561 May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/17/25	EB	Correspond with NC and review portions of monthly fee statement (0.1); communicate with [redacted], P. Tomasco, B. Howell, and Stris Team regarding final revisions to and filing of updated Stris retention application and supporting materials (0.7).	.80	1250.00	1,000.00
4/17/25	CHH	Assist VO with finalizing second interim fee application and proposed order to same.	.20	350.00	70.00
4/22/25	EB	Continue preparing portions of monthly fee application.	1.70	1250.00	2,125.00
4/23/25	EB	Continue preparing portions of monthly fee application.	2.90	1250.00	3,625.00
4/28/25	VO	Prepare March monthly fee application (0.8); emails with B. Howell and client regarding filing of same (0.1).	.90	1025.00	922.50
		TOTAL PROFESSIONAL SERVICES			**$ 20,292.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	9.80	1,250.00	12,250.00
Victor O'Connell	VO	Partner	5.90	1,025.00	6,047.50
Cynthia Huang	CHH	Fellow	4.40	350.00	1,540.00
Nicholas Capalbo	NC	Fellow	1.30	350.00	455.00
Total			**21.40**		**$ 20,292.50**

TOTAL THIS INVOICE **$ 20,292.50**

Stris & Maher LLP

Invoice # 14561 May 14, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14381	1/13/25	6,285.00	5,028.00	1,257.00
14472	2/21/25	8,575.00	6,860.00	1,715.00
14499	3/28/25	16,177.50	12,942.00	3,235.50
14532	4/23/25	11,102.50	.00	11,102.50

Previous Balance	$ 17,310.00
Balance Due This Invoice	$ 20,292.50
TOTAL BALANCE DUE	**$ 37,602.50**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 11,102.50	$ 3,235.50	$ 1,715.00	$ .00	$ 1,257.00	$ 17,310.00

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

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

STRIS & MAHER LLP'S NINTH MONTHLY FEE STATEMENT
FOR THE PERIOD MAY 1, 2025, THROUGH MAY 31, 2025

Stris & Maher LLP ("Stris & Maher") submits, pursuant to the Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the "Interim Compensation Order") (ECF No. 264) entered on October 14, 2024, this monthly fee statement for the payment of interim compensation rendered and reimbursement of expenses incurred during the period May 1, 2025, through May 31, 2025 (the "Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $143,678.00 (80% of the services rendered), plus $7,394.36 (100% of the interim expenses incurred). *See* Interim Compensation Order at ¶ 1(a). Summaries of the fees and expenses are attached as Exhibits 1, 2, and 3. Invoices reflecting detailed time entries are attached hereto as Exhibit 4.

[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), 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.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall serve within 14 days after delivery of the Monthly Fee Statement a written notice, via email, upon Stris & Maher and each of the other Fee Notice Parties (as listed below) (the "Written Notice"). The Written Notice shall set forth with reasonable detail the nature of the objection and the amount at issue. If the parties are unable to reach a resolution of the objection within 14 calendar days, the objecting party shall file its objection (the "Objection") with this Court within 3 business days and serve such Objection on Stris & Maher and each of the other Fee Notice Parties. See Interim Compensation Order ¶ 1(c).

The Fee Notice Parties as defined in the Interim Compensation Order are:

a. Rhodium Enterprises, Inc., Attn: Charles Topping (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 2617 Bissonnet Street, Suite 234, Houston, Texas 77005;

b. Debtors' Bankruptcy Counsel, c/o Quinn Emanuel Urquhart & Sullivan, LLP, Attn: Patricia B. Tomasco (pattytomasco@quinnemanuel.com); Razmig Izakelian (razmigizakelian@quinnemanuel.com), Alain Jaquet (alainjaquet@quinnemanuel.com), and Joanna D. Caytas (joannacaytas@quinnemanuel.com), 700 Louisiana, Suite 3900, Houston, Texas 77002;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (mrobinson@provincefirm.com); David Dunn (ddunn@provincefirm.com); Kirsten Lee (klee@province.com); and Andrew Popescu (apopescu@provincefirm.com), 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074;

d. Galaxy Digital, LLC, in its capacity as DIP Agent, c/o Orrick, Herrington & Sutcliffe LLP, Ryan C. Wooten (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 51 West 52nd Street, New York, New York 10019;

e. Counsel or proposed counsel to any statutory committee appointed in these Chapter 11 Cases; and

f. United States Trustee, Ha Minh Nguyen (ha.nguyen@usdoj.gov), 515 Rusk, Suite 3516, Houston, Texas 77002.

If no objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Stris & Maher an amount equal to 80% of the fees and 100% of the expenses listed herein, or if an objection is timely served, such percentage of fees and expenses that are not subject to an objection, as stated in the Interim Compensation Order.

Respectfully submitted this 13th day of June, 2025.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
Patricia B. Tomasco (SBN 01797600)
Joanna D. Caytas (SBN 24127230)
Cameron Kelly (SBN 24120936)
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Email: razmigizakelian@quinnemanuel.com

-and-

STRIS & MAHER LLP

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Helen Marsh (pro hac vice)

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-and-

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408 W. 11th Street, 5th Floor
Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on June 13, 2025, a true and correct copy of the foregoing Monthly Fee Statement was served through the Court's Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco
Patricia B. Tomasco

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	6.20	$6,170.00	$4,936.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	169.00	$159,317.50	$127,454.00
007	Retention and Fee Applications	13.10	$14,110.00	$11,288.00
Total		188.3	$179,597.50	$143,678.00

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	3.90	$4,875.00
Bridget Asay	Partner	1997	1,200.00	.40	$480.00
Colleen Smith	Partner	2015	850.00	.30	$255.00
Andrew Atsalis	Litigation Fellow	N/A	350.00	.20	$70.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	1.40	$490.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	53.00	$66,250.00
Bridget Asay	Partner	1997	1,200.00	32.00	$38,400.00
Victor O'Connell	Partner	2012	1,025.00	.50	$512.50
John Stokes	Partner	2016	1,025.00	33.60	$34,440.00
Colleen Smith	Associate	2015	850.00	2.30	$1,955.00
Peter Brody	Associate	2016	850.00	.40	$340.00
Monica Viramontes	Senior Paralegal	N/A	425.00	12.00	$5,100.00
Quoc Hoang	Legal Tech Specialist	N/A	350.00	.50	$175.00
Andrew Atsalis	Litigation Fellow	N/A	350.00	3.50	$1,225.00
Cynthia Huang	Litigation Fellow	N/A	350.00	.70	$245.00
Sebastian Delgado	Litigation Fellow	N/A	350.00	14.50	$5,075.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	.60	$210.00
Jaida Hodge-Adams	Litigation Fellow	N/A	350.00	15.40	$5,390.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	2.40	$3,000.00
Bridget Asay	Partner	1997	1,200.00	4.20	$5,040.00
Victor O'Connell	Partner	2012	1,025.00	.90	$922.50
John Stokes	Partner	2016	1,025.00	4.50	$4,612.50
Colleen Smith	Partner	2015	850.00	.30	$255.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	.70	$280.00

EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
E-discovery platform fees	$3,765.00
Total	$3,765.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
E-discovery platform fees	$2,646.00
E-discovery related costs	$983.36
Total	$3,629.36

EXHIBIT 4

Stris

June 10, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14587
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through May 31, 2025

RE: Midas Green Litigation

Total Professional Services	$ 6,170.00
Total Expenses Advanced	$ 3,765.00
TOTAL THIS INVOICE	**$ 9,935.00**
Previous Balance	$ 13,906.50
TOTAL BALANCE DUE	**$ 23,841.50**

Electronic Invoice

Stris & Maher LLP

Invoice # 14587 June 10, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
5/08/25	EB	Review and respond to P. Tomasco regarding notice of filing of Midas reply (0.1); review same (0.1).	.20	1250.00	250.00
5/09/25	EB	Correspond with BA and JS regarding status and high priority action items (0.2); attend teleconference with BA and JS regarding GMO request for declaration (0.2); correspond with [redacted] regarding protective order compliance and related vendor and document issues (0.2).	.40	1250.00	500.00
5/09/25	NC	Prepare notice of filing for EB (0.8); prepare exhibits for same for EB (0.6).	1.40	350.00	490.00
5/09/25	ASA	Assist NC with preparation of notice of order.	.20	350.00	70.00
5/20/25	EB	Communicate with P. Tomasco regarding and begin preparing for hearing on Midas claim.	.50	1250.00	625.00
5/21/25	EB	Correspond with R. Harrington regarding hearing on objection to Midas proof of claim.	.10	1250.00	125.00
5/27/25	EB	Begin preparing for hearing and [redacted] on Midas proof of claim in consultation with BA, JS, and R. Harrington.	.50	1250.00	625.00
5/27/25	BA	Confer with EB regarding [redacted] to Midas claim and correspond with EB and Quinn team regarding same.	.20	1200.00	240.00
5/28/25	EB	Prepare and coordinate contact with clerk and opposing counsel regarding hearing request (0.2); update client regarding status and next steps (0.1); coordinate filing of notice of hearing with CS (0.2); assess potential further briefing in advance of hearing and correspond with co-counsel regarding same (1.0).	1.50	1250.00	1,875.00
5/28/25	BA	Correspond with EB and team regarding outreach to court on Midas Green hearing.	.20	1200.00	240.00
5/28/25	CS	Review, finalize and file notice of hearing.	.30	850.00	255.00
5/29/25	EB	Correspond with R. Harrington regarding next steps to prepare for upcoming hearing.	.10	1250.00	125.00

Stris & Maher LLP

Invoice # 14587 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/30/25	EB	Continue working on next steps in support of opposition to Midas Green claim in consultation with co-counsel (0.5); update BA and JS regarding same (0.1).	.60	1250.00	750.00
		TOTAL PROFESSIONAL SERVICES			**$ 6,170.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	3.90	1,250.00	4,875.00
Bridget Asay	BA	Partner	.40	1,200.00	480.00
Colleen Smith	CS	Associate	.30	850.00	255.00
Andrew Atsalis	ASA	Fellow	.20	350.00	70.00
Nicholas Capalbo	NC	Fellow	1.40	350.00	490.00
Total			**6.20**		**$ 6,170.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
5/16/25		JND Discovery Invoice for April 2025.	3,765.00
		TOTAL EXPENSES ADVANCED	**$ 3,765.00**
		TOTAL THIS INVOICE	**$ 9,935.00**

Stris & Maher LLP

Invoice # 14587 June 10, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14530	4/23/25	28,410.00	25,071.00	3,339.00
14560	5/14/25	10,567.50	.00	10,567.50

Previous Balance	$ 13,906.50
Balance Due This Invoice	$ 9,935.00
TOTAL BALANCE DUE	**$ 23,841.50**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 10,567.50	$ 3,339.00	$ .00	$ .00	$ .00	$ 13,906.50

Stris

June 10, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14575
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through May 31, 2025

RE: Whinstone Litigation

Total Professional Services	$ 159,317.50
Total Expenses Advanced	$ 3,629.36
TOTAL THIS INVOICE	**$ 162,946.86**
Previous Balance	$ 154,360.50
TOTAL BALANCE DUE	**$ 317,307.36**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Stris & Maher LLP

Invoice # 14575 June 10, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
5/01/25	EB	Attention to high priority action items including protective order compliance.	.50	1250.00	625.00
5/01/25	MV	Discuss Logikcull download data options with chief technology officer, correspondence regarding the same (0.2); review protective order regarding destruction of documents after dismissal, correspondence regarding next steps for data destruction and download of client data (0.5).	.70	425.00	297.50
5/02/25	EB	Review draft and correspond with BA and JS regarding [redacted] declaration (0.2); further revise same (0.3); prepare for (0.2) and attend (0.7) teleconference with BA and [redacted] regarding declaration and protective order compliance; correspond with MV regarding next steps in support of protective order compliance (0.1).	1.50	1250.00	1,875.00
5/02/25	BA	Confer with EB and [redacted] to discuss and revise declaration (0.7); review revised declaration and correspond with EB and JS regarding same ().1).	.80	1200.00	960.00
5/02/25	JS	Work on declaration of [redacted] in connection with LKC revised retention application.	.40	1025.00	410.00
5/05/25	EB	Correspond with BA, JS, co-counsel and clients regarding status and action items including additional dismissal papers and compliance with settlement agreement provisions (0.4); evaluate further potential revisions to [redacted] declaration (0.2).	.60	1250.00	750.00
5/05/25	BA	Review comments from [redacted] regarding declaration, correspond with EB and JS regarding same, and review settlement agreements as requested by [redacted] in connection with declaration (0.4); correspond with EB and JS regarding arbitration dismissal and review docket for arbitration (0.2).	.60	1200.00	720.00
5/05/25	JHA	Prepare memorandum with links to important documents for attorney use.	2.00	350.00	700.00

Stris & Maher LLP

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/06/25	EB	Review related correspondence, revise [redacted] declaration, and correspond with BA, JS, and [redacted] regarding next steps in support of same (0.4); correspond with BA, JS, ASA, and co-counsel regarding updates and action items including filing of arbitration dismissal request and client updates (0.2); correspond with BA, KH, VO, ASA, client, and counsel for [redacted] regarding response to transcript request (0.3).	.90	1250.00	1,125.00
5/06/25	BA	Correspond with AA, EB and team regarding AAA docket and efile, review final stipulation of dismissal and efile same (0.3); correspond JS, and with EB and JS regarding LKC fee dispute (0.2); confer with EB and correspond with EB and team regarding request from [redacted] for deposition transcript, and research same (0.3).	.80	1200.00	960.00
5/06/25	JHA	Prepare memorandum with links to important documents for attorney use.	3.00	350.00	1,050.00
5/06/25	ASA	Correspond with EB, BA, and A. Swartz (Lehotsky Keller Cohn) regarding filing of joint motion to dismiss arbitration (0.3); file and organize closing American Arbitration Association documentation at request of BA (0.5).	.80	350.00	280.00
5/07/25	EB	Review correspondence regarding final revisions to [redacted] declaration (0.1); work on protective order compliance requirements and related vendor and document issues (0.2).	.30	1250.00	375.00
5/07/25	JS	Work on finalization of [redacted] declaration in support of LKC amended retention application (0.8); evaluate Debtor arguments in support of LKC amended retention application (0.5).	1.30	1025.00	1,332.50
5/07/25	JHA	Detailed tracking of docket updates for bankruptcy proceeding.	.60	350.00	210.00

Stris & Maher LLP

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/08/25	EB	Continue assessing requirements and working on protective order compliance (1.1); correspond with PB and MV regarding same (0.1); review and respond to correspondence with BA and JS regarding high priority action items including client update regarding SAFE objections (0.1).	1.30	1250.00	1,625.00
5/08/25	BA	Confer with JS regarding reply in support of application to amend LKC retention (0.3); begin researching and drafting reply memorandum in support of Debtors' application to amend LKC retention and correspond with JS regarding strategy for same (2.1); correspond with EB, JS, PB and [redacted] regarding status and high priority action items (0.5).	2.90	1200.00	3,480.00
5/08/25	JHA	Continue preparing memorandum with links to important documents for attorney use.	.50	350.00	175.00
5/08/25	SD	Research docket and pull documents related to Lehotsky Keller Cohen's retention dispute (1.6); begin preparing Rhodium's response to SAFE's objection to the Lehotsky Keller Cohen retention for BA (0.9).	2.50	350.00	875.00
5/09/25	EB	Attend teleconference with BA and JS regarding GMO request for declaration (0.2); attend to and correspond with [redacted] regarding protective order compliance and related vendor and document issues (0.4).	.60	1250.00	750.00
5/09/25	BA	Correspond with EB regarding status and high priority action items including recent filings (0.2); confer with EB and JS regarding high priority action items including GMO request for business records (0.2).	.40	1200.00	480.00
5/09/25	JS	Confer with EB and BA regarding GMO subpoena (0.2).	.20	1025.00	205.00
5/09/25	JHA	Continue preparing memorandum with links to important documents for attorney use.	2.00	350.00	700.00
5/09/25	SD	Work on debtors' reply to objection of the ad hoc group of SAFE parties for BA.	1.60	350.00	560.00
5/10/25	EB	Review and respond to correspondence from BA and JS regarding client teleconference.	.10	1250.00	125.00
5/10/25	BA	Continue researching and drafting reply in support of Debtors' application to amend LKC retention (3.3).	3.30	1200.00	3,960.00

Stris & Maher LLP

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/11/25	BA	Continue researching and drafting reply in support of Debtors' application to amend LKC retention and correspond with JS regarding same.	1.00	1200.00	1,200.00
5/12/25	EB	Attend portion of teleconference with BA, [redacted] and [redacted] regarding action items including protective order compliance and related document issues (0.6); correspond with MV regarding database backup process and client request (0.2); correspond with P. Tomasco, R. Izakelian, clients, and Stris team regarding same (0.1).	.90	1250.00	1,125.00
5/12/25	BA	Confer with [redacted] and E. Brannen regarding matters related to protective order and data preservation needs (0.5); confer with [redacted] regarding issues related to LKC retention dispute (0.1); confer with [redacted] and P. Tomasco regarding protective order/data preservation and Stris retention matter (0.3); (0.8); correspond with SD regarding review of transcript of prior status conference regarding LKC retention (0.2); correspond with W. Thompson regarding deadline for filings related to LKC retention dispute (0.1); correspond and confer with JS regarding LKC retention dispute and briefing on same (0.1); continue researching and drafting reply in support of updated LKC retention (1.7).	3.00	1200.00	3,600.00
5/12/25	JS	Review BA draft of reply regarding LKC retention application.	.50	1025.00	512.50
5/12/25	JHA	Continue preparing memorandum with links to important documents for attorney use.	2.20	350.00	770.00
5/12/25	SD	Evaluate transcripts and trancribed audio recordings to confirm information for BA regarding LCK retention.	1.40	350.00	490.00
5/12/25	MV	Review correspondence regarding transfer of client data (0.1); evaluate steps for transfer of data and correspond with vendor regarding same (0.2).	.30	425.00	127.50
5/13/25	EB	Review and correspond with BA and JS regarding action items including further revisions to Debtors' draft reply submission in support of LKC amended fee application (0.4); correspond with R. Izakelian regarding protective order compliance and related document issues and procedures (0.1).	.50	1250.00	625.00

Stris & Maher LLP

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/13/25	BA	Review and revise draft reply in support of LKC retention and convey same to [redacted] for review, and review comments and suggestions from [redacted] on same (0.6); review question from LKC's counsel regarding [redacted] issues and correspond with JS regarding same (0.2) and confer with JS regarding same (0.2).	1.00	1200.00	1,200.00
5/13/25	JS	Attend teleconference with BA regarding LKC retention application (0.2).	.20	1025.00	205.00
5/13/25	CHH	Assist MV with pull of Logikcull data for clients.	.10	350.00	35.00
5/13/25	PB	Correspond with EB and MV to provide information in support of client data request.	.40	850.00	340.00
5/13/25	MV	Work on exporting of client data from Logikcull including corresponding with vendor and creating searches and initial downlod of files (4.7); update EB regarding estimate of project scope (0.3).	5.00	425.00	2,125.00
5/14/25	EB	Correspond with Stris team regarding status and high priority action items (0.5); advise MV regarding information in support of file backup request from client and co-counsel (0.1).	.60	1250.00	750.00
5/14/25	BA	Research [redacted] issues as relevant to LKC retention, correspond with JS and EB regarding same, and confer with JS regarding same.	.30	1200.00	360.00
5/14/25	JS	Evaluate [redacted] issues and confer with BA regarding same (0.4) and prepare [redacted] declaration (1.5).	1.90	1025.00	1,947.50
5/14/25	CHH	Review and respond to attorney correspondence.	.10	350.00	35.00
5/14/25	MV	Continue working on exporting of client data including correspondence with vendor regarding redacted and native unredacted files, running test export, and discussing same with QH.	1.50	425.00	637.50
5/15/25	EB	Assess and review and respond to correspondence with BA, JS, co-counsel and client regarding response to inquiry concerning [redacted].	.50	1250.00	625.00

Stris & Maher LLP

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/15/25	BA	Review client request regarding [redacted] and correspond with EB regarding same (0.1); continue drafting reply in support of LKC retention, correspond with JS and EB regarding same, and revise draft to incorporate client comments and convey revisions to JS and EB (1.2).	1.30	1200.00	1,560.00
5/15/25	JS	Work on Debtors' reply in support of LKC updated retention.	2.50	1025.00	2,562.50
5/15/25	SD	Cite check and assist BA with finalization of Debtors' reply to SAFE Group's objection to Lehotsky Keller Cohen amended retention agreement.	3.50	350.00	1,225.00
5/16/25	EB	Communicate with J. Cohn regarding status and action items in advance of hearing on LKC updated fee application (0.1); review, revise, and correspond with BA, JS, and CS regarding revisions to draft reply in support of same and [redacted] declaration (1.7); review and correspond with BA, JS, P. Tomasco, and R. Izakelian regarding action items including opposition to SAFE motion to compel and motion for protective order (0.7); review related correspondence and confer with BA and JS regarding deposition request (0.2).	2.70	1250.00	3,375.00
5/16/25	BA	Convey new discovery subpoenas from SAFE AHG to P. Tomasco and [redacted] (0.1); review draft motion for a protective order prepared by Quinn and convey comments on same (0.3); review final draft of reply memorandum in support of LKC retention and correspond with SD and CS as needed to assist in finalizing same and confirm filing of same, and correspond with [redacted] regarding same (0.8); review correspondence from AHG regarding request for deposition and confer with JS and EB regarding same (0.2); confer with SD regarding preparation of exhibit and witness list, correspond with JS regarding potential witness, and convey initial draft of same to JS (0.4).	1.80	1200.00	2,160.00
5/16/25	CHH	Precisely track and organize documents and deadlines for attorney use.	.20	350.00	70.00
5/16/25	SD	Continue assisting BA with revisions to Debtors' reply regarding Lehotsky Keller Cohn retention (1.4); research regarding witness and exhibit lists and begin drafting Debtors' witness and exhibit list for Lehotsky Keller Cohn retention hearing (1.6).	3.00	350.00	1,050.00

Stris & Maher LLP

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/16/25	MV	Correspond with CHH regarding action items in support of client data export including additional production in separate workspace.	.20	425.00	85.00
5/17/25	EB	Review correspondence from counsel for SAFE AHG (0.1); correspond with BA and JS regarding revisions to response to same (0.2).	.30	1250.00	375.00
5/17/25	BA	Correspond with JS and EB regarding responses to SAFE AHG.	.20	1200.00	240.00
5/17/25	JS	Review and evaluate next steps in light of SAFE AHG notice of deposition of C. Topping and correspond with SAFE AHG regarding same.	3.10	1025.00	3,177.50
5/18/25	EB	Correspond with BA and JS regarding revisions to further correspondence with counsel for SAFE AHG regarding upcoming hearing and strategy for same.	.70	1250.00	875.00
5/18/25	BA	Review ongoing correspondence with SAFE AHG's regarding upcoming hearing and correspond with JS and EB regarding [redacted] and for hearing (0.5); draft exhibit and witness list and convey same to JS and EB for review, and correspond with CS regarding upcoming filing (0.6).	1.10	1200.00	1,320.00
5/18/25	JS	Further review and evaluate next steps in light of SAFE AHG notice of deposition of C. Topping and correspond with SAFE AHG regarding same.	4.00	1025.00	4,100.00
5/19/25	EB	Attend teleconference with BA, JS, and counsel for LKC regarding discussions with counsel for SAFE AHG regarding challenge to C. Topping declaration (0.5); attention to negotiations and communications addressing same (1.3); review and correspond with BA regarding revisions to exhibit and witness lists (0.2); correspond with BA and JS regarding protective order compliance and [redacted] (0.1); begin preparing for C. Topping deposition preparation (1.0).	3.10	1250.00	3,875.00

Stris & Maher LLP

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/19/25	BA	Participate in teleconference with JS, EB, and LKC's counsel to discuss potential continuance of hearing, prep for same, and planned conferral with SAFE AHG (.5); correspond with JS, EB, SD, and CS as needed for final revisions to and finalization of exhibit and witness list, and review and approve same for filing (0.5); draft motion for continuance and/or acceptance of Topping declaration and correspond with SD and JH as needed for assistance with formatting and revisions to same (1.2); review correspondence with SAFE AHG in attempt to negotiate continuance and correspond and confer with JS regarding strategy for and responses to same (0.6); correspond with EB regarding [redacted] issues (0.1); correspond with CS and JS regarding joint motion for continuance, and with Quinn team regarding procedure for same (0.1).	3.00	1200.00	3,600.00
5/19/25	JS	Work on SAFE AHG challenge to C. Topping declaration, including correspondence and calls with opposing counsel, client coordination regarding continuance, and preparation of motion for continuance in light of AHG's unreasonable positions.	7.70	1025.00	7,892.50
5/19/25	CS	Draft stipulation to continue hearing on updated application to employ LKC; draft updated notice of hearing; review docket entries and email communications in preparation for drafting the same; review, finalize and file witness and exhibit list.	1.80	850.00	1,530.00
5/19/25	JHA	Collect materials including emergency motions at BA request (1.0); assist with preparing draft emergency motion (0.5); provide requested additional information to BA including regarding Texas Southern District [redacted] and procedures (0.6).	2.10	350.00	735.00
5/19/25	SD	Continue preparing exhibits to accompany Debtors' witness list (1.3); assist BA and JS with potential motion seeking continuance (1.2).	2.50	350.00	875.00
5/20/25	VO	Confer with BA, EB, and JS regarding strategy for upcoming hearing on AHG discovery disputes and strategy for upcoming deposition and hearing related to LKC retention dispute.	.50	1025.00	512.50

Stris & Maher LLP

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/20/25	EB	Advise NC regarding revisions to notice of rescheduled hearing and correspond with BA, JS, CS, NC, co-counsel and opposing parties regarding same (0.2); correspond with counsel for Whinstone regarding document issues (0.1); review and analyze SAFE AHG correspondence and reply briefing on motion to compel Imperium and Debtors and communicate with BA and JS regarding same (0.4); continue preparing for C. Topping deposition preparation (1.5); confer with BA, VO (portion), and JS regarding [redacted] for same and upcoming hearing on AHG discovery disputes and hearing related to LKC retention dispute (0.8).	3.00	1250.00	3,750.00
5/20/25	BA	Confer with JS, EB, and VO (portion) regarding [redacted] for upcoming hearing on AHG discovery disputes and [redacted] for upcoming deposition and hearing related to LKC retention dispute (0.8); review filings related to AHG discovery disputes and objection to AHG claim (0.3); correspond with EB and JS regarding outreach from M. Fox regarding LKC dispute (0.1); correspond with JS and JH action items in support of upcoming hearing and ensuring [redacted] properly requested (0.1); review draft joint request for continuance, review court order granting continuance, review draft notice of hearing, correspond with Quinn team to review same, and assist EB and team with finalizing same (0.2).	1.50	1200.00	1,800.00
5/20/25	CS	Review, finalize and file updated notice of hearing on updated application to employ LKC; email communications regarding the same.	.50	850.00	425.00
5/20/25	CHH	Precisely track and organize documents for attorney use (0.2); precisely track and calendar deadlines for attorney use (0.1).	.30	350.00	105.00
5/20/25	NC	Revise notice of rescheduling of hearing on LKC fee application	.60	350.00	210.00
5/20/25	JHA	Assist BA and JS with preparation for motion to compel hearing and filing privileges.	1.00	350.00	350.00
5/20/25	MV	Continue working on export of unredacted client documents.	.10	425.00	42.50
5/21/25	EB	Continue preparing for deposition preparation of C. Topping pertaining to LKC application for updated fee motion (4.9); analyze interim implications for same from hearing on SAFE and Rhodium discovery motions in consultation with JS (0.2).	5.10	1250.00	6,375.00

Stris & Maher LLP

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/21/25	BA	Attend motion hearing to monitor with respect to matters relating to Stris, to LKC retention, and to documents produced related to Whinstone litigation, and confer with JS regarding same.	2.00	1200.00	2,400.00
5/21/25	JS	Prepare for and attend hearing on motion to compel filed by SAFE AHG in light of potential connection to LKC retention application (1.8); evaluate next steps in connection with deposition of C. Topping and hearing on LKC retention application in light of same (1.0).	2.80	1025.00	2,870.00
5/21/25	JHA	Attention to attorney requests regarding documents and updates to filing status (0.8); correspond with Houston bankryptcy court regarding filing status for JS (0.2).	1.00	350.00	350.00
5/22/25	EB	Continue preparing for C. Topping deposition (3.5); review portions of rough transcript of [redacted] in support of same (1.2).	4.70	1250.00	5,875.00
5/22/25	BA	Provide research and analysis to EB in preparation for deposition preparation of C. Topping.	.40	1200.00	480.00
5/22/25	JS	Work on preparation for deposition of C. Topping.	.80	1025.00	820.00
5/22/25	QH	Assist with export and download of multiple-part zipped files for requested [redacted].	.50	350.00	175.00
5/22/25	MV	Continue working on export and back up of client documents including correspondence with EB and vendor regarding metadata and potential de-duplification and review of search fields for export.	2.50	425.00	1,062.50
5/23/25	EB	Continue preparing for C. Topping deposition preparation (3.0); attend teleconference with [redacted] regarding same (0.2); correspond with BA, VO, JS, and ASA regarding action items in support of same and resulting from discovery hearing (0.1); begin working on production of certain pre-petition invoices (0.5); correspond with R. Izakelian regarding same (0.1).	3.90	1250.00	4,875.00
5/23/25	BA	Review discovery requests from LKC related to LKC dispute; correspond with EB and review correspondence from AHG regarding Topping deposition parameters.	.20	1200.00	240.00

Stris & Maher LLP

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/23/25	ASA	Analyze recent filings related to Debtors' application for an updated order authorizing the retention and employment of Lehotsky Keller Cohn LLP at request of EB, review full docket for related filings, and prepare all relevant briefing and supporting material to assist EB with preparation of C. Topping for upcoming deposition.	2.20	350.00	770.00
5/23/25	MV	Review download of zip files containing client data to check file format and functionality of load files.	.20	425.00	85.00
5/24/25	EB	Review and communicate with BA, JS, co-counsel, and [redacted] regarding inquiry concerning Whinstone [redacted] invoice.	.30	1250.00	375.00
5/24/25	BA	Review Whinstone invoices forwarded by [redacted], research same, and correspond with EB and team regarding potential response to same.	.40	1200.00	480.00
5/25/25	EB	Review and respond to correspondence from BA and co-counsel regarding inquiry concerning Whinstone [redacted] invoice.	.10	1250.00	125.00
5/25/25	BA	Research background on payment of [redacted] charges, draft proposed response to Whinstone objecting to [redacted], and convey analysis and proposed draft to client, litigation team, and Quinn team for review.	.60	1200.00	720.00
5/26/25	BA	Correspond with client, EB, and P. Tomasco regarding mistaken Whinstone invoice for [redacted].	.10	1200.00	120.00
5/27/25	EB	Continue preparing for and assisting C. Topping with preparation for deposition (4.8); confer with BA regarding issues and analysis in support of same (0.4); communicate with BA, JS, and [redacted] regarding hearing scheduled for June 4 (0.1); continue attending to invoices for production in consultation with R. Izakelian, BA, and JS (0.7); confer with BA and JS regarding potential [redacted], hearing, and deposition preparation (0.5).	6.50	1250.00	8,125.00

Stris & Maher LLP

Invoice # 14575 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/27/25	BA	Monitor court hearing as potentially relevant to LKC dispute and update EB and JS regarding same (0.2); analyze issues and confer with EB to assist with deposition preparation for C. Topping (0.4); correspond with EB and JS regarding potential [redacted] for LKC dispute and confer with JS and EB regarding issues related to same (0.5); correspond with EB and JS regarding redaction of LKC and Stris invoices for production (0.1); confer with EB and JS regarding potential [redacted], hearing, and deposition preparation (0.5).	1.70	1200.00	2,040.00
5/27/25	JS	Prepare for and attend portion of deposition preparation session with C. Topping and EB (1.4); prepare for hearing on LKC retention application (1.5).	3.90	1025.00	3,997.50
5/28/25	EB	Continue preparing for C. Topping deposition (4.0); communicate with [redacted], BA, and JS regarding preparation for same and related hearing (0.2).	4.20	1250.00	5,250.00
5/28/25	BA	Assist with matters for preparation for C. Topping deposition, including corresponding with EB and JS regarding issues for same, and regarding invoice production.	.60	1200.00	720.00
5/28/25	JHA	Detailed tracking of docket updates for bankruptcy proceeding.	1.00	350.00	350.00
5/28/25	MV	Continue working on export of client data including creation of additional downloads containing unredacted and redacted data.	1.50	425.00	637.50
5/29/25	EB	Continue preparing for C. Topping deposition.	5.90	1250.00	7,375.00
5/29/25	BA	Confer with EB to assist in preparing for deposition of C. Topping and meet with EB and [redacted] regarding same.	3.00	1200.00	3,600.00
5/29/25	JS	Prepare for hearing on LKC retention application.	2.00	1025.00	2,050.00
5/29/25	ASA	Conduct research at request of EB in preparation for upcoming deposition of C. Topping on June 3, 2025.	.50	350.00	175.00
5/30/25	EB	Continue preparing for deposition of C. Topping (4.0); communicate with T. Schmeltz and P. Lohse regarding same (0.2).	4.20	1250.00	5,250.00
5/30/25	JS	Attend portion of deposition preparation session with [redacted] and EB (1.5); prepare for hearing on LKC retention application (0.8).	2.30	1025.00	2,357.50

Invoice # 14575 June 10, 2025

TOTAL PROFESSIONAL SERVICES **$ 159,317.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	53.00	1,250.00	66,250.00
Bridget Asay	BA	Partner	32.00	1,200.00	38,400.00
Victor O'Connell	VO	Partner	.50	1,025.00	512.50
John Stokes	JS	Partner	33.60	1,025.00	34,440.00
Colleen Smith	CS	Associate	2.30	850.00	1,955.00
Peter Brody	PB	Associate	.40	850.00	340.00
Monica Viramontes	MV	Sr Paralegal	12.00	425.00	5,100.00
Quoc Hoang	QH	Legal Technology Spe	.50	350.00	175.00
Andrew Atsalis	ASA	Fellow	3.50	350.00	1,225.00
Cynthia Huang	CHH	Fellow	.70	350.00	245.00
Sebastian Delgado	SD	Fellow	14.50	350.00	5,075.00
Nicholas Capalbo	NC	Fellow	.60	350.00	210.00
Jaida Hodge-Adams	JHA	Fellow	15.40	350.00	5,390.00
Total			**169.00**		**$ 159,317.50**

EXPENSES ADVANCED

Date	Task	Description	Amount
5/01/25		Logikcull Discovery Solutions (May 2025).	2,646.00
5/22/25		Purchase of (4) hard drives for data backup.	983.36

TOTAL EXPENSES ADVANCED **$ 3,629.36**

TOTAL THIS INVOICE **$ 162,946.86**

Stris & Maher LLP

Invoice # 14575 June 10, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14517	4/23/25	503,457.91	404,817.41	98,640.50
14547	5/14/25	55,720.00	.00	55,720.00

Previous Balance	$ 154,360.50
Balance Due This Invoice	$ 162,946.86
TOTAL BALANCE DUE	**$ 317,307.36**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 55,720.00	$ 98,640.50	$ .00	$ .00	$ .00	$ 154,360.50

Stris

June 10, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14588
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through May 31, 2025

RE: Retention and Fee Applications

Total Professional Services	$ 14,110.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 14,110.00**
Previous Balance	$ 22,513.00
TOTAL BALANCE DUE	**$ 36,623.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14588 June 10, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
5/07/25	EB	Advise NC regarding preparation of portions of monthly fee statement.	.20	1250.00	250.00
5/07/25	NC	Assist EB with preparation of fee statements.	.80	350.00	280.00
5/09/25	EB	Review and revise reply in support of updated retention application to address SAFE objection (0.5); correspond with BA and JS regarding same (0.1).	.60	1250.00	750.00
5/09/25	BA	Confer with EB and JS regarding Ad Hoc Group's objection to updated Stris retention (0.3); draft reply in support of updated Stris retention, convey same to JS and EB for review, and review edits from JS to same (1.0).	1.30	1200.00	1,560.00
5/09/25	JS	Work on Stris reply regarding Stris retention application.	1.50	1025.00	1,537.50
5/10/25	BA	Review comments from P. Tomasco and [redacted] on draft reply in support of updated Stris retention, research and further revise same, and convey revised draft to JS and EB for review.	1.80	1200.00	2,160.00
5/10/25	JS	Work on Stris reply regarding Stris retention application.	1.50	1025.00	1,537.50
5/12/25	VO	Prepare certificate of no objection and emails with B. Howell regarding same.	.20	1025.00	205.00
5/12/25	EB	Review and correspond with BA and JS regarding action items including revisions to updated draft reply in support of amended engagement order.	.40	1250.00	500.00
5/12/25	BA	Revise reply in support of Stris retention, convey same to JS, P. Tomasco, and [redacted] for review, further revise and finalize same and correspond with CS for filing (0.8); correspond with JS, B. Howell, and P. Tomasco regarding status conference on Stris retention and notice of hearing for same, and correspond with JS regarding status conference (0.2).	1.00	1200.00	1,200.00
5/12/25	JS	Work on reply regarding Stris retention application.	1.50	1025.00	1,537.50
5/12/25	CS	File Reply to Ad Hoc Group of Safe Parties Objection to Debtor's Application for an Updated Order Authorizing the Retention and Employment of Stris & Maher LLP as Special Litigation Counsel.	.30	850.00	255.00

Stris & Maher LLP

Invoice # 14588 June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/13/25	EB	Prepare portions of monthly fee statement.	.70	1250.00	875.00
5/13/25	BA	Attend by teleconference status conference on Stris retention.	.10	1200.00	120.00
5/20/25	EB	Continue working on portions of monthly fee statement.	.50	1250.00	625.00
5/21/25	VO	Prepare April monthly fee application (0.5); emails with B. Howell and client regarding same (0.2).	.70	1025.00	717.50

TOTAL PROFESSIONAL SERVICES **$ 14,110.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	2.40	1,250.00	3,000.00
Bridget Asay	BA	Partner	4.20	1,200.00	5,040.00
Victor O'Connell	VO	Partner	.90	1,025.00	922.50
John Stokes	JS	Partner	4.50	1,025.00	4,612.50
Colleen Smith	CS	Associate	.30	850.00	255.00
Nicholas Capalbo	NC	Fellow	.80	350.00	280.00
Total			**13.10**		**$ 14,110.00**

TOTAL THIS INVOICE **$ 14,110.00**

Stris & Maher LLP

Invoice # 14588 June 10, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14532	4/23/25	11,102.50	8,882.00	2,220.50
14561	5/14/25	20,292.50	.00	20,292.50

Previous Balance	$ 22,513.00
Balance Due This Invoice	$ 14,110.00
TOTAL BALANCE DUE	**$ 36,623.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 20,292.50	$ 2,220.50	$ .00	$ .00	$ .00	$ 22,513.00

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

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

STRIS & MAHER LLP'S NINTH MONTHLY FEE STATEMENT
FOR THE PERIOD JUNE 1, 2025, THROUGH JUNE 30, 2025

Stris & Maher LLP ("Stris & Maher") submits, pursuant to the Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the "Interim Compensation Order") (ECF No. 264) entered on October 14, 2024, this monthly fee statement for the payment of interim compensation rendered and reimbursement of expenses incurred during the period June 1, 2025, through June 30, 2025 (the "Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $181,376.00 (80% of the services rendered), plus $11,305.52 (100% of the interim expenses incurred). *See* Interim Compensation Order at ¶ 1(a). Summaries of the fees and expenses are attached as Exhibits 1, 2, and 3. Invoices reflecting detailed time entries are attached hereto as Exhibit 4.

[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), 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.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall serve within 14 days after delivery of the Monthly Fee Statement a written notice, via email, upon Stris & Maher and each of the other Fee Notice Parties (as listed below) (the "Written Notice"). The Written Notice shall set forth with reasonable detail the nature of the objection and the amount at issue. If the parties are unable to reach a resolution of the objection within 14 calendar days, the objecting party shall file its objection (the "Objection") with this Court within 3 business days and serve such Objection on Stris & Maher and each of the other Fee Notice Parties. See Interim Compensation Order ¶ 1(c).

The Fee Notice Parties as defined in the Interim Compensation Order are:

a. Rhodium Enterprises, Inc., Attn: Charles Topping (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 2617 Bissonnet Street, Suite 234, Houston, Texas 77005;

b. Debtors' Bankruptcy Counsel, c/o Quinn Emanuel Urquhart & Sullivan, LLP, Attn: Patricia B. Tomasco (pattytomasco@quinnemanuel.com); Razmig Izakelian (razmigizakelian@quinnemanuel.com), Alain Jaquet (alainjaquet@quinnemanuel.com), and Joanna D. Caytas (joannacaytas@quinnemanuel.com), 700 Louisiana, Suite 3900, Houston, Texas 77002;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (mrobinson@provincefirm.com); David Dunn (ddunn@provincefirm.com); Kirsten Lee (klee@province.com); and Andrew Popescu (apopescu@provincefirm.com), 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074;

d. Galaxy Digital, LLC, in its capacity as DIP Agent, c/o Orrick, Herrington & Sutcliffe LLP, Ryan C. Wooten (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 51 West 52nd Street, New York, New York 10019;

e. Counsel or proposed counsel to any statutory committee appointed in these Chapter 11 Cases; and

f. United States Trustee, Ha Minh Nguyen (ha.nguyen@usdoj.gov), 515 Rusk, Suite 3516, Houston, Texas 77002.

If no objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Stris & Maher an amount equal to 80% of the fees and 100% of the expenses listed herein, or if an objection is timely served, such percentage of fees and expenses that are not subject to an objection, as stated in the Interim Compensation Order.

Respectfully submitted this 17th day of July, 2025.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
Patricia B. Tomasco (SBN 01797600)
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-and-

STRIS & MAHER LLP

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-and-

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alexis@lkcfirm.com
408 W. 11th Street, 5th Floor
Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on July 17, 2025, a true and correct copy of the foregoing Monthly Fee Statement was served through the Court's Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco
Patricia B. Tomasco

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	72.1	$78,860.00	$63,088.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	141.9	$133,992.50	$107,194.00
007	Retention and Fee Applications	6.7	$7,227.50	$5,782.00
008	Non-working Travel	7.4	$6,640.00	$5,312.00
Total			$226,720.00	$181,376.00

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	13.90	$17,375.00
Tillman Breckenridge	Partner	2003	1,200.00	11.40	$13,680.00
Ken Halpern	Partner	1997	1,100.00	41.90	$46,090.00
Andrew Atsalis	Litigation Fellow	N/A	350.00	4.90	$1,715.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	34.20	$42,750.00
Bridget Asay	Partner	1997	1,200.00	26.20	$31,440.00
John Stokes	Partner	2016	1,025.00	43.40	$44,485.00
Peter Brody	Associate	2016	850.00	.30	$255.00
Colleen Smith	Associate	2015	850.00	.50	$425.00
Rachel Fleischer	Staff Attorney	2021	525.00	2.40	$1,260.00
Monica Viramontes	Senior Paralegal	N/A	425.00	15.50	$6,587.50
Quoc Hoang	Legal Tech Specialist	N/A	350.00	3.00	$1,050.00
Andrew Atsalis	Litigation Fellow	N/A	350.00	2.30	$805.00
Sebastian Delgado	Litigation Fellow	N/A	350.00	11.70	$4,095.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	2.40	$840.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	3.70	$4,625.00
Victor O'Connell	Partner	2012	1,025.00	.60	$615.00
John Stokes	Partner	2016	1,025.00	1.70	$1,742.50
Nicholas Capalbo	Litigation Fellow	N/A	350.00	.70	$245.00

Non-Working Travel[2]

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
John Stokes	Partner	2016	1,025.00	6.00	$6,150.00
Sebastian Delgado	Litigation Fellow	N/A	350.00	1.40	$490.00
Total after 50% discount					

[2] Stris & Maher has billed its time for travel during which no work was performed on a separate invoice at a 50% discount.

EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
E-discovery platform fees	$3,765.00
Travel	$1,052.36
Total	$4,817.36

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
E-discovery platform fees	$2,646.00
Travel	$1,851.47
Court transcription services	$1,990.69
Total	$6,488.16

EXHIBIT 4

Stris

July 16, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14614
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through June 30, 2025

RE: Midas Green Litigation

Total Professional Services	$ 78,860.00
Total Expenses Advanced	$ 4,817.36
TOTAL THIS INVOICE	**$ 83,677.36**
Previous Balance	$ 5,180.50
TOTAL BALANCE DUE	**$ 88,857.86**

Electronic Invoice

Stris & Maher LLP

Invoice # 14614 July 16, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
6/02/25	EB	Work on reply in advance of hearing on objection to Midas Green claim.	.50	1250.00	625.00
6/03/25	EB	Advise TB regarding action items in support of reply brief (0.2); review and update client and co-counsel regarding correspondence from counsel for Midas (0.1).	.30	1250.00	375.00
6/03/25	TB	Review and analyze documents in support of further filing on objection to Midas claim (0.3) confer with EB regarding same (0.2).	.50	1200.00	600.00
6/04/25	EB	Correspond with counsel for Midas Green (0.1); review and respond to correspondence from R. Harrington (0.1).	.20	1250.00	250.00
6/05/25	EB	Attend teleconference with counsel for Midas Green (0.2); update client and co-counsel regarding same (0.1); correspond with Stris team regarding status and upcoming action items (0.1).	.40	1250.00	500.00
6/09/25	EB	Continue working on [redacted] brief and hearing preparation (0.3); attend teleconference with KH regarding same (0.3); correspond with R. Harrington and update TB and KH regarding status and brief (0.1).	.70	1250.00	875.00
6/09/25	KJH	Teleconference with EB regarding opposition brief to proof of claim and hearing prep on that claim.	.30	1100.00	330.00
6/09/25	TB	Analyze materials to assist with reply brief and hearing preparation.	.90	1200.00	1,080.00
6/10/25	EB	Update [redacted] regarding status and action items in support of upcoming hearing.	.10	1250.00	125.00
6/10/25	TB	Continue analyzing materials including summary judgment transcript to assist EB with hearing preparation and further briefing.	.50	1200.00	600.00
6/10/25	ASA	Prepare materials for EB, TB, and KH in support of further briefing and preparation for hearing.	.80	350.00	280.00
6/11/25	EB	Prepare status summary as requested by [redacted].	.80	1250.00	1,000.00
6/14/25	TB	Continue analyzing district court materials to assist EB and KH with further briefing and EB with hearing preparation.	1.40	1200.00	1,680.00

Stris & Maher LLP

Invoice # 14614 July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/15/25	TB	Continue analyzing Midas-related bankruptcy court materials to assist EB and KH with further briefing and EB with hearing preparation.	3.60	1200.00	4,320.00
6/16/25	EB	Correspond with R. Harrington regarding status and action items in support of reply brief.	.10	1250.00	125.00
6/16/25	KJH	Review and analyze bankruptcy court filings and record on motion for summary judgment of noninfringement in preparation for reply and hearing on objection to claim in bankruptcy court.	3.20	1100.00	3,520.00
6/16/25	TB	Continue assisting with preparation for July 8 hearing.	.50	1200.00	600.00
6/17/25	EB	Continue preparing for hearing on objections to Midas claims.	1.00	1250.00	1,250.00
6/17/25	KJH	Conduct additional research on [redacted] of district court's oral order granting summary judgment [redacted] in preparation for reply and bankruptcy court hearing on objection to claim.	3.80	1100.00	4,180.00
6/18/25	KJH	Teleconference with EB regarding status, research findings, and further tasks to prepare for hearing (0.3); further research record and law and draft analysis and talking points regarding [redacted] of district court's bench ruling [redacted] in support of further briefing and hearing preparation (3.2).	3.50	1100.00	3,850.00
6/19/25	KJH	Further research [redacted] of oral summary judgment ruling and factual record, and revise analysis in preparation for hearing on Midas's proof of claim.	5.20	1100.00	5,720.00
6/20/25	EB	Review correspondence from KH and Texas counsel in support of preparation for hearing on objection to Midas claim (0.1); continue analyzing materials in preparation for same including research updates and analysis from KH (1.0).	1.10	1250.00	1,375.00
6/20/25	KJH	Research and revise analysis of [redacted] of Western District's grant of summary judgment, research [redacted] of claim under [redacted], and correspond with EB regarding same (4.8); teleconference with E. Winston (Quinn) regarding same (0.2).	5.00	1100.00	5,500.00
6/21/25	EB	Correspond with KH regarding status and action items in support of hearing preparation.	.10	1250.00	125.00

Stris & Maher LLP

Invoice # 14614 July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/23/25	EB	Analyze and correspond with KH regarding next steps in support of objection to Midas claim.	.50	1250.00	625.00
6/23/25	KJH	Research law on [redacted] of patent claims in bankruptcy court in preparation for review of reply brief and for July 8 hearing (2); correspond with E. Brannen regarding [redacted] at summary judgment hearing regarding [redacted] its rulings (0.1).	2.10	1100.00	2,310.00
6/24/25	EB	Attend teleconference with R. Harrington regarding status and action items in support of reply brief (0.2); analyze and correspond with KH regarding same and potential further arguments in support of objections to Midas claim (3.5).	3.70	1250.00	4,625.00
6/24/25	KJH	In preparation for editing reply and for hearing on Midas' proof of claim, research [redacted] of patent claim in bankruptcy court, and teleconference with EB regarding same.	2.10	1100.00	2,310.00
6/25/25	EB	Correspond with KH regarding update and further research in support of additional arguments for opposition to Midas claim (0.2); continue analyzing same (1.0); correspond with R. Harrington and KH regarding next steps in support of draft reply (0.1); work on same (1.1).	2.40	1250.00	3,000.00
6/25/25	KJH	Review draft reply brief in opposition to Midas proof of claim and initial revisions from TB and correspond with EB regarding issues to be addressed in same.	.40	1100.00	440.00
6/25/25	TB	Review reply brief and prior briefing and edit reply brief on objection to Midas Green claim.	1.80	1200.00	2,160.00
6/26/25	EB	Advise PB and MV regarding preservation and maintenance of document database (0.1); correspond with TB, KH, and R. Harrington regarding further revisions to reply brief in support of objection to Midas claim and related [redacted] issues (0.4).	.50	1250.00	625.00

Stris & Maher LLP

Invoice # 14614 July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/26/25	KJH	Teleconference with EB regarding revisions to reply brief in opposition to Midas proof of claim (0.2); teleconference with TB regarding reply brief tasks (0.1); teleconference with R. Harrington regarding reply brief in opposition to Midas proof of claim (0.3); correspond with EB and R. Harrington regarding US trustee's [redacted] (0.1); teleconference and correspond with VO regarding research into [redacted] for use in reply brief (0.1); teleconference and correspond with AA regarding research into [redacted] and [redacted] in patent case for use in reply brief (0.2); research [redacted] of claims [redacted] for drafting material for reply brief (1.4).	2.40	1100.00	2,640.00
6/26/25	TB	Propose further edits to revised reply brief on Midas Green objection.	2.20	1200.00	2,640.00
6/27/25	KJH	Revise draft reply in opposition to Midas's proof of claim.	3.10	1100.00	3,410.00
6/27/25	ASA	Analyze deposition transcripts, expert reports, and correspondence between counsel regarding [redacted] in support of KH and drafting of reply in opposition to Midas's proof of claim.	1.90	350.00	665.00
6/29/25	KJH	Revise draft reply in opposition to Midas proof of claim, research case law and factual record to support arguments in reply, and correspond with EB, TB and ASA regarding same.	6.80	1100.00	7,480.00
6/30/25	EB	Continue working on further opposition brief including analyzing revisions proposed by TB and KH and additional arguments for incorporation into same.	1.50	1250.00	1,875.00
6/30/25	KJH	Research law relating to [redacted] of claims purporting to cover post-bankruptcy petition conduct and [redacted] of claims [redacted].	3.70	1100.00	4,070.00
6/30/25	KJH	Teleconference with AA regarding statistics on Midas/Rhodium patent litigation and adjustments to reply in opposition to Midas proof of claim (0.2); teleconference with R. Harrington regarding revisions to reply in opposition to Midas proof of claim (0.1).	.30	1100.00	330.00

Stris & Maher LLP

Invoice # 14614 July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/30/25	ASA	Revise draft reply in opposition to Midas's proof of claim at request of KH and circulate with EB and TB (0.2); analyze deposition transcripts to calculate cumulative time already spent taking depositions as a data point in support of draft reply in opposition to Midas's proof of claim (1.6); correspond with KH regarding further edits to draft reply in opposition to Midas's proof of claim (0.2); analyze and provide attorneys with statistical figures related to past document productions (0.2).	2.20	350.00	770.00
		TOTAL PROFESSIONAL SERVICES			**$ 78,860.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	13.90	1,250.00	17,375.00
Tillman Breckenridge	TB	Partner	11.40	1,200.00	13,680.00
Ken Halpern	KJH	Partner	41.90	1,100.00	46,090.00
Andrew Atsalis	ASA	Fellow	4.90	350.00	1,715.00
Total			**72.10**		**$ 78,860.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
5/31/25		JND Discovery Invoice for May 2025.	3,765.00
6/03/25		EB airfare for hearing in Houston.	1,052.36
		TOTAL EXPENSES ADVANCED	**$ 4,817.36**
		TOTAL THIS INVOICE	**$ 83,677.36**

Stris & Maher LLP

Invoice # 14614 July 16, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14530	4/23/25	28,410.00	25,071.00	3,339.00
14560	5/14/25	10,567.50	9,960.00	607.50
14587	6/10/25	9,935.00	8,701.00	1,234.00

Previous Balance	$ 5,180.50
Balance Due This Invoice	$ 83,677.36
TOTAL BALANCE DUE	**$ 88,857.86**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 1,234.00	$ 3,946.50	$ .00	$ .00	$ 5,180.50

Stris

July 16, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14602
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through June 30, 2025

RE: Whinstone Litigation

Total Professional Services	$ 133,992.50
Total Expenses Advanced	$ 6,488.16
TOTAL THIS INVOICE	**$ 140,480.66**
Previous Balance	$ 141,648.00
TOTAL BALANCE DUE	**$ 282,128.66**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Stris & Maher LLP

Invoice # 14602 July 16, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
6/02/25	EB	Address correspondence and document requests from counsel for SAFE AHG in advance of C. Topping deposition (1.5); continue preparing for (2.7) and defend (3.0) same; begin attending to resulting action items including assessment of additional requested documents (1.2); assist with preparation for upcoming hearing on LKC amended fee application (1.0).	9.40	1250.00	11,750.00
6/02/25	BA	Review emailed document request from SAFE AHG and correspondence from JS regarding same (0.1); confer with JS and EB regarding document request, privilege issues, and response to same (1); review and redact requested document, confer with SD as needed for assistance with same, and correspond with EB and JS regarding redactions and privilege issues (0.8); confer with JS and correspond with bankruptcy counsel, CS and SD as needed to direct preparation of, review, and ensure filing of exhibit and witness hearing for LKC dispute (0.3); correspond and confer with JS regarding ongoing demands from SAFE AHG (0.2); correspond with JS, and with JS and EB, regarding hearing [redacted] and witness preparation, Topping deposition and further document requests, and outreach to Akin regarding hearing (0.4); review rough TR of Topping deposition to assist with hearing preparation (0.8).	3.60	1200.00	4,320.00
6/02/25	JS	Prepare for hearing on LKC retention application (6.9); attend portions of deposition of C. Topping in connection with same (1.8).	8.70	1025.00	8,917.50
6/02/25	CS	Review, finalize, and file witness and exhibit list for hearing on retention of LKC as special litigation counsel.	.30	850.00	255.00
6/02/25	SD	Analyze draft application for order authorizing Lehotsky Keller Cohn as special litigation counsel and application to employ Lehotsky Keller Cohn as special litigation counsel as instructed by BA (1.9); prepare new draft of debtors' witness and exhibit list, prepare proposed PDF, compile exhibits to be filed along with debtors' witness and exhibit list, and send to BA, CS, and JS (0.5).	2.40	350.00	840.00

Stris & Maher LLP

Invoice # 14602 July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/02/25	MV	Review and correspond with vendor regarding status of client document downloads.	.20	425.00	85.00
6/02/25	RF	Review, analyze, calendar, and inform the team of new filings.	.60	525.00	315.00
6/03/25	EB	Analyze and address requests from counsel for SAFE AHG for further documents (1.9); continue analyzing materials including transcript and exhibits and assisting with preparation for C. Topping testimony at LKC retention application hearing (3.1); meet with [redacted] (BA present for portion) regarding same (1.7); attend meet and confer requested by counsel for SAFE AHG (0.5).	7.20	1250.00	9,000.00
6/03/25	BA	Analyze action items to assist with hearing preparation (0.8); review multiple additional SAFE document requests and begin assessing privilege, burden, and work product issues and correspond with EB and JS regarding same (1.0); correspond with JS regarding [redacted] and legal analysis in preparation for hearing on LKC dispute, outline [redacted], and convey same to JS (1.0); confer with EB and [redacted] to assist in witness preparation for hearing (0.8); prepare for meet and confer with SAFE counsel (0.3); participate in meet and confer with SAFE AHG, EB, JS, and other counsel in preparation for hearing on LKC matter, and confer further with EB and JS regarding same (0.7).	4.60	1200.00	5,520.00
6/03/25	JS	Prepare for hearing on LKC retention application.	10.30	1025.00	10,557.50
6/03/25	ASA	Prepare briefing and supporting documentation at request of JS in support of his preparation for June 4 hearing regarding retention of Lehotsky Keller Cohn LLP.	2.30	350.00	805.00
6/03/25	SD	Obtain and organize C. Topping deposition materials in advance of hearing (0.3); prepare and provide BA and JS with additional materials including replies regarding Lehotsky Keller Cohn's retention application (0.3).	.60	350.00	210.00
6/03/25	MV	Continue working with vendor to secure client document exports.	.50	425.00	212.50
6/03/25	RF	Review, analyze, and inform EB, BA, JS, and CS of new filings.	.10	525.00	52.50

Stris & Maher LLP

Invoice # 14602 July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/04/25	EB	Review and correspond with BA and JS regarding new objectionable correspondence from counsel for SAFE AHG (0.4); review newly added SAFE AHG exhibits (0.2); continue assisting with hearing preparation (1.0); attend hearing on LKC updated fee application (3.0); begin attending to resulting action items including assessing material for 5-page brief (0.5).	5.10	1250.00	6,375.00
6/04/25	BA	Review correspondence from SAFE AHG changing position regarding exhibit agreements and correspond with JS and EB regarding hearing [redacted] (0.4); monitor hearing on LKC dispute (2.0); analyze points for post hearing memorandum and correspond with SD regarding research for same (0.2).	2.60	1200.00	3,120.00
6/04/25	JS	Prepare for and attend hearing on LKC retention application, including redoing direct examination in light of SAFE AHG's withdrawal of agreement to proceed partially by declaration.	11.30	1025.00	11,582.50
6/04/25	MV	Check status of exporting of client data to confirm progress and timing.	.10	425.00	42.50
6/04/25	RF	Review and analyze new filings (0.2); correspond with EB, BA, JS, and CS regarding same (0.2).	.40	525.00	210.00
6/05/25	EB	Work on 5-page submission in consultation with BA, JS, co-counsel, and counsel for LKC.	2.60	1250.00	3,250.00
6/05/25	BA	Confer with JS, EB, and LKC team regarding post-hearing brief and [redacted] for same (0.7); confer with SD as needed regarding research for same, and research and begin drafting same (2.9).	3.60	1200.00	4,320.00
6/05/25	JS	Work on potential [redacted] with objectors (0.9); work on post-hearing brief (1.5).	2.40	1025.00	2,460.00
6/05/25	SD	Research bankruptcy treatises concerning Rule 2014 for BA (1.7); prepare and send materials to BA (0.5); begin drafting debtors' post-hearing memorandum as directed by BA (0.4).	2.60	350.00	910.00
6/05/25	MV	Continue assessing progress of client data downloads and update EB regarding status.	.20	425.00	85.00
6/05/25	RF	Review, analyze, and correspond with EB, BA, JS, and CS regarding new filings.	.30	525.00	157.50

Stris & Maher LLP

Invoice # 14602 July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/06/25	EB	Continue working on 5-page brief and supporting research (2.0); confer with BA regarding [redacted] and edits to same (0.2).	2.20	1250.00	2,750.00
6/06/25	BA	Continue researching and drafting post-hearing memorandum regarding LKC dispute and convey drafts to JS and EB for review (5.3): confer with EB regarding [redacted] and edits to draft (0.2).	5.50	1200.00	6,600.00
6/06/25	JS	Review and evaluate post-hearing brief (2.0); work on potential [redacted] with objectors (1.2).	3.20	1025.00	3,280.00
6/06/25	SD	Assist BA with materials in support of post-hearing briefing.	.30	350.00	105.00
6/06/25	MV	Continue working on export of client data.	.20	425.00	85.00
6/06/25	RF	Correspond with EB, BA, JS, and CS regarding status and new filings.	.20	525.00	105.00
6/07/25	EB	Continue working on 5-page post-hearing brief in consultation with BA and JS (1.0); review and communicate with BA and JS regarding [redacted] relating to same (0.2).	1.20	1250.00	1,500.00
6/07/25	BA	Review correspondence from AHG regarding potential [redacted] and request for additional information, review LKC response to same, and correspond with JS and EB regarding same.	.20	1200.00	240.00
6/07/25	JS	Work on post-hearing brief (1.3); continued work on potential [redacted] with objectors and evaluating information request from SAFE AHG in connection with same (1.0).	2.30	1025.00	2,357.50
6/08/25	BA	Correspond with JS regarding research questions for post-hearing memorandum and AHG request for extension.	.10	1200.00	120.00
6/09/25	EB	Continue working on 5-page post-hearing brief.	1.50	1250.00	1,875.00
6/09/25	BA	Continuing researching issues relevant to LKC fee dispute, review and edit draft memorandum, and review court order regarding deadline and audio recording.	1.60	1200.00	1,920.00
6/09/25	JS	Work on post-hearing brief.	1.90	1025.00	1,947.50
6/09/25	MV	Continue working to export client documents.	.50	425.00	212.50
6/09/25	RF	Correspond with EB, BA, JS, and CS regarding action items and pleadings.	.60	525.00	315.00

Stris & Maher LLP

Invoice # 14602 July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/10/25	EB	Continue revising and communicating with BA, JS, client and co-counsel regarding final revisions to post-hearing brief including to incorporate comments from client and co-counsel.	4.90	1250.00	6,125.00
6/10/25	BA	Review revisions to joint filing from LKC's attorneys, correspond with EB and JS regarding same and further potential revisions, and confer with JS regarding same (0.8); confer with EB and [redacted] regarding same (0.1); confer as needed with SD to supervise cite check for joint post-hearing filing, continue researching and revising same, correspond with JS, EB, and LKC's attorneys regarding same, and finalize and final same (3.2).	4.10	1200.00	4,920.00
6/10/25	JS	Work on and assist in finalizing post-hearing brief.	3.30	1025.00	3,382.50
6/10/25	SD	Assist EB, BA, and JS with final revisions to and finalization of post-hearing memorandum.	5.00	350.00	1,750.00
6/10/25	MV	Continue working to export client data for backup.	.20	425.00	85.00
6/10/25	RF	Correspond with EB, BA, JS, and CS regarding new filings.	.20	525.00	105.00
6/11/25	BA	Review SAFE AHG's post-hearing memorandum (0.2); correspond with JS and EB regarding data storage (0.1).	.30	1200.00	360.00
6/11/25	QH	Download and transfer multiple-part zip files from Logikcull onto an external hard drive.	1.20	350.00	420.00
6/11/25	PB	Discuss status and advise MV regarding database export of client documents.	.50	850.00	425.00
6/11/25	SD	Review, organize, and track post-hearing briefing and qc docket updating of earlier filings related to LKC retention to ensure completeness and accuracy.	.80	350.00	280.00
6/11/25	MV	Meet with PB regarding next steps in support of export of client documents (0.5); continue working on same in consultation with QH and preparing for end of vendor hosting cotract (3.3).	3.80	425.00	1,615.00
6/12/25	EB	Correspond with BA and JS regarding data storage issues and correspondence with client regarding same.	.10	1250.00	125.00
6/12/25	MV	Continue working to save and verify exported client files including load files to external hard drive.	1.20	425.00	510.00

Stris & Maher LLP

Invoice # 14602 July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/16/25	QH	Download and transfer 00346 RHOD - Gen 001 export of 148 multiple-part zip files from Logikcull onto an external hard drive.	1.80	350.00	630.00
6/16/25	MV	Check status of data transfer.	.10	425.00	42.50
6/17/25	MV	Continue working on (1.2), update EB regarding (0.2), and draft memoranda regarding (1.5) export of client data.	2.90	425.00	1,232.50
6/18/25	MV	Correspond with vendor regarding end of document hosting and end of contract process.	.20	425.00	85.00
6/20/25	NC	Review and organize recent filings for attorney review.	2.40	350.00	840.00
6/20/25	MV	Correspond with EB regarding instructions to vendor and end of contract process.	.20	425.00	85.00
6/26/25	MV	Continue working on end of document vendor and client backup process in consultation with EB, PB, and QH.	1.20	425.00	510.00
6/27/25	MV	Review correspondence from QH regarding status and next steps in support of vendor contract termination and work on same.	.50	425.00	212.50
6/30/25	MV	Work with vendor on final steps to terminate contract and confirm exports of client data.	3.50	425.00	1,487.50
		TOTAL PROFESSIONAL SERVICES			**$ 133,992.50**

Invoice # 14602 July 16, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	34.20	1,250.00	42,750.00
Bridget Asay	BA	Partner	26.20	1,200.00	31,440.00
John Stokes	JS	Partner	43.40	1,025.00	44,485.00
Colleen Smith	CS	Associate	.30	850.00	255.00
Peter Brody	PB	Associate	.50	850.00	425.00
Rachel Fleischer	RF	Staff Attorney	2.40	525.00	1,260.00
Monica Viramontes	MV	Sr Paralegal	15.50	425.00	6,587.50
Quoc Hoang	QH	Legal Technology Spe	3.00	350.00	1,050.00
Andrew Atsalis	ASA	Fellow	2.30	350.00	805.00
Sebastian Delgado	SD	Fellow	11.70	350.00	4,095.00
Nicholas Capalbo	NC	Fellow	2.40	350.00	840.00
Total			**141.90**		**$ 133,992.50**

EXPENSES ADVANCED

Date	Task	Description	Amount
5/29/25		JS airfare for hearing on LKC retention.	1,176.96
5/30/25		JS lodging for hearing on LKC retention.	325.24
6/01/25		Logikcull Discovery Solutions (June 2025).	2,646.00
6/03/25		Vendor fee for transcripts for Charles Topping dated 06/02/2025.	1,990.69
6/04/25		JS transportation for hearing on LKC retention.	349.27
		TOTAL EXPENSES ADVANCED	**$ 6,488.16**
		TOTAL THIS INVOICE	**$ 140,480.66**

Stris & Maher LLP

Invoice # 14602 July 16, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14517	4/23/25	503,457.91	404,817.41	98,640.50
14547	5/14/25	55,720.00	44,576.00	11,144.00
14575	6/10/25	162,946.86	131,083.36	31,863.50

Previous Balance	$ 141,648.00
Balance Due This Invoice	$ 140,480.66
TOTAL BALANCE DUE	**$ 282,128.66**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 31,863.50	$ 109,784.50	$ .00	$ .00	$ 141,648.00

Stris

July 16, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14615
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through June 30, 2025

RE: Retention and Fee Applications

Total Professional Services	$ 7,227.50
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 7,227.50**
Previous Balance	$ 9,101.00
TOTAL BALANCE DUE	**$ 16,328.50**

Electronic Invoice

Stris & Maher LLP

Invoice # 14615 July 16, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
5/13/25	JS	Prepare for and attend status conference on Stris retention application.	1.70	1025.00	1,742.50
6/05/25	EB	Begin preparing portions of monthly fee statement.	.50	1250.00	625.00
6/05/25	NC	Assist EB in preparation of monthly fee statements.	.70	350.00	245.00
6/06/25	EB	Continue preparing portions of monthly fee statement.	.90	1250.00	1,125.00
6/09/25	EB	Continue preparing portions of monthly fee statement.	1.20	1250.00	1,500.00
6/10/25	EB	Continue preparing portions of monthly fee statement.	1.10	1250.00	1,375.00
6/13/25	VO	Prepare May monthly fee statement.	.60	1025.00	615.00

TOTAL PROFESSIONAL SERVICES **$ 7,227.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	3.70	1,250.00	4,625.00
Victor O'Connell	VO	Partner	.60	1,025.00	615.00
John Stokes	JS	Partner	1.70	1,025.00	1,742.50
Nicholas Capalbo	NC	Fellow	.70	350.00	245.00
Total			**6.70**		**$ 7,227.50**

TOTAL THIS INVOICE **$ 7,227.50**

Stris & Maher LLP

Invoice # 14615 July 16, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14532	4/23/25	11,102.50	8,882.00	2,220.50
14561	5/14/25	20,292.50	16,234.00	4,058.50
14588	6/10/25	14,110.00	11,288.00	2,822.00

Previous Balance	$ 9,101.00
Balance Due This Invoice	$ 7,227.50
TOTAL BALANCE DUE	**$ 16,328.50**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 2,822.00	$ 6,279.00	$ .00	$ .00	$ 9,101.00

Stris

July 16, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14630
Client # 00346
Matter # 008

INVOICE SUMMARY

For professional services rendered through June 30, 2025

RE: Non-working Travel

Total Professional Services	$ 6,640.00
50% discount	$ -3,320.00
Net Professional Services	$ 3,320.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 3,320.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14630 July 16, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
6/03/25	JS	Non-working travel to hearing on LKC retention.	2.00	1025.00	2,050.00
6/04/25	JS	Non-working return travel from hearing on LKC retention.	4.00	1025.00	4,100.00
6/05/25	SD	Travel to and from Vermont Law School to conduct research on bankruptcy treatises concerning Rule 2014 and employment of an attorney for BA .	1.40	350.00	490.00

TOTAL PROFESSIONAL SERVICES	**$ 6,640.00**
50% discount	$ -3,320.00
NET PROFESSIONAL SERVICES	**$ 3,320.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
John Stokes	JS	Partner	6.00	1,025.00	6,150.00
Sebastian Delgado	SD	Fellow	1.40	350.00	490.00
Total			**7.40**		**$ 6,640.00**

TOTAL THIS INVOICE **$ 3,320.00**

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

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

STRIS & MAHER LLP'S ELEVENTH MONTHLY FEE STATEMENT
FOR THE PERIOD JULY 1, 2025, THROUGH JULY 31, 2025

Stris & Maher LLP ("Stris & Maher") submits, pursuant to the Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the "Interim Compensation Order") (ECF No. 264) entered on October 14, 2024, this monthly fee statement for the payment of interim compensation rendered and reimbursement of expenses incurred during the period July 1, 2025, through July 31, 2025 (the "Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $128,704.00 (80% of the services rendered), plus $5,387.03 (100% of the interim expenses incurred). *See* Interim Compensation Order at ¶ 1(a). Summaries of the fees and expenses are attached as Exhibits 1, 2, and 3. Invoices reflecting detailed time entries are attached hereto as Exhibit 4.

[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), 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.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall serve within 14 days after delivery of the Monthly Fee Statement a written notice, via email, upon Stris & Maher and each of the other Fee Notice Parties (as listed below) (the "Written Notice"). The Written Notice shall set forth with reasonable detail the nature of the objection and the amount at issue. If the parties are unable to reach a resolution of the objection within 14 calendar days, the objecting party shall file its objection (the "Objection") with this Court within 3 business days and serve such Objection on Stris & Maher and each of the other Fee Notice Parties. See Interim Compensation Order ¶ 1(c).

The Fee Notice Parties as defined in the Interim Compensation Order are:

a. Rhodium Enterprises, Inc., Attn: Charles Topping (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 2617 Bissonnet Street, Suite 234, Houston, Texas 77005;

b. Debtors' Bankruptcy Counsel, c/o Quinn Emanuel Urquhart & Sullivan, LLP, Attn: Patricia B. Tomasco (pattytomasco@quinnemanuel.com); Razmig Izakelian (razmigizakelian@quinnemanuel.com), Alain Jaquet (alainjaquet@quinnemanuel.com), and Joanna D. Caytas (joannacaytas@quinnemanuel.com), 700 Louisiana, Suite 3900, Houston, Texas 77002;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (mrobinson@provincefirm.com); David Dunn (ddunn@provincefirm.com); Kirsten Lee (klee@province.com); and Andrew Popescu (apopescu@provincefirm.com), 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074;

d. Galaxy Digital, LLC, in its capacity as DIP Agent, c/o Orrick, Herrington & Sutcliffe LLP, Ryan C. Wooten (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 51 West 52nd Street, New York, New York 10019;

e. Counsel or proposed counsel to any statutory committee appointed in these Chapter 11 Cases; and

f. United States Trustee, Ha Minh Nguyen (ha.nguyen@usdoj.gov), 515 Rusk, Suite 3516, Houston, Texas 77002.

If no objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Stris & Maher an amount equal to 80% of the fees and 100% of the expenses listed herein, or if an objection is timely served, such percentage of fees and expenses that are not subject to an objection, as stated in the Interim Compensation Order.

Respectfully submitted this 19th day of August, 2025.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Patricia B. Tomasco
Patricia B. Tomasco (SBN 01797600)
Cameron Kelly (SBN 24120936)
Alain Jaquet (*pro hac vice)*
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-and-

STRIS & MAHER LLP

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Austin, TX 78701

Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on August 19, 2025, a true and correct copy of the foregoing Monthly Fee Statement was served through the Court's Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco
Patricia B. Tomasco

EXHIBIT 1

Summary of Legal Fees for the Fee Period

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	166.10	$147,572.50	$118,058.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	5.30	$2,485.00	$1,988.00
007	Retention and Fee Applications	8.60	$5,822.50	$4,658.00
008	Non-working Travel	8.00	$5,000.00	$4,000.00
Total		188.00	$160,880.00	$128,704.00

EXHIBIT 2

Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals

Midas Green Patent Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	63.70	$79,625.00
Tillman Breckenridge	Partner	2003	1,200.00	3.10	$3,720.00
Ken Halpern	Partner	1997	1,100.00	31.60	$34,760.00
Peter Brody	Associate	2016	850.00	11.50	$9,775.00
Monica Viramontes	Senior Paralegal	N/A	425.00	.30	$127.50
Andrew Atsalis	Litigation Fellow	N/A	350.00	42.30	$14,805.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	13.60	$4,760.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Bridget Asay	Partner	1997	1,200.00	.30	$360.00
Monica Viramontes	Senior Paralegal	N/A	425.00	5.0	$2,125.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	2.0	2,500.00
Victor O'Connell	Partner	2012	1,025.00	1.5	1,537.50
Cynthia Huang	Litigation Fellow	N/A	350.00	5.1	1,785.00

Non-Working Travel[2]

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	8.0	$10,000.00
Total after 50% discount					$5,000.00

[2] Stris & Maher has billed its time for travel during which no work was performed on a separate invoice at a 50% discount.

EXHIBIT 3

Summaries of Expenses for the Fee Period

Midas Green Patent Litigation

Expense	Amount
E-discovery platform fees	$3,765.00
Travel	$1,032.58
Printing services	$47.04
Total	**$4,844.62**

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
Printing services	$542.41
Total	**$542.41**

EXHIBIT 4

Stris

August 7, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14650
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through July 31, 2025

RE: Midas Green Litigation

Total Professional Services	$ 147,572.50
Total Expenses Advanced	$ 4,844.62
TOTAL THIS INVOICE	**$ 152,417.12**
Previous Balance	$ 15,771.99
TOTAL BALANCE DUE	**$ 168,189.11**

Electronic Invoice

Stris & Maher LLP

Invoice # 14650 August 7, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
7/01/25	EB	Review current draft further brief opposing Midas claim (0.3); work on same (0.5) and correspond with KH, TB, and ASA regarding further revisions to same (0.4).	1.20	1250.00	1,500.00
7/01/25	KJH	Further review and revise reply in opposition to Midas's proof claim and correspond with EB and TB regarding same.	1.90	1100.00	2,090.00
7/01/25	TB	Revise reply brief opposing Midas patent claim.	3.10	1200.00	3,720.00
7/01/25	ASA	Assist KH and TB with edits to reply brief opposing Midas patent claim and work with R. Harrington to implement same.	2.00	350.00	700.00
7/02/25	EB	Prepare for hearing on objection to Midas claim.	1.80	1250.00	2,250.00
7/02/25	KJH	Work on revisions to reply brief in consultation with R. Harrington.	.70	1100.00	770.00
7/03/25	EB	Attend teleconferences with KH (0.5) and R. Harrington (0.2) regarding action items in support of revisions to further brief objecting to Midas claim and hearing; prepare for hearing (4.8); review and communicate with R. Harrington regarding further revised brief (0.7).	6.20	1250.00	7,750.00
7/03/25	KJH	Teleconferences with EB regarding revisions to reply in opposition to Midas's proof of claim (0.5); teleconferences with R. Harrington regarding revisions to reply in opposition to Midas's proof of claim (0.2); review events in Western District of Texas action since summary judgment hearing and correspond with EB regarding same (0.4); review and revise reply in opposition to Midas's proof of claim (0.6); review case law regarding exclusion of postpetition conduct from claim in bankruptcy and correspond with EB regarding same (0.4).	2.10	1100.00	2,310.00
7/03/25	ASA	Prepare materials requested by EB in preparation for upcoming hearing (1.6); correspond with B. Howell regarding sealed briefing in preparation for same (0.1).	1.70	350.00	595.00

Stris & Maher LLP

Invoice # 14650 August 7, 2025

Date	Tkpr	Description	Hours	Rate	Amount
7/07/25	EB	Continue preparing for hearing on objection to Midas claim (8.0); review proposed final further brief and correspond with P. Tomasco, R. Harrington, and KH regarding same (0.3); correspond with KH, PB, ASA, and R. Harrington regarding summary judgment hearing slides (0.1).	8.40	1250.00	10,500.00
7/07/25	KJH	Review and revise reply brief in opposition to proof of claim and correspond with R. Harrington and EB regarding same.	.70	1100.00	770.00
7/08/25	EB	Continue preparing for (3.9) and attend (0.5) hearing on objection to Midas proof of claim; attend to resulting action items in consultation with P. Tomasco and R. Harrington (0.5); update Stris team and begin preparing summary judgment motion (1.5); confer with KH regarding same (0.3).	6.70	1250.00	8,375.00
7/08/25	KJH	Analyze hearing on Midas' proof of claim in support of subsequent briefing (0.3); confer with EB regarding same (0.3); conduct research in support of further briefing including regarding status of Midas's [redacted] on asserted patents (1.0).	1.60	1100.00	1,760.00
7/09/25	EB	Continue working on summary judgment motion.	1.20	1250.00	1,500.00
7/09/25	KJH	Work on portions of summary judgment briefing.	1.50	1100.00	1,650.00
7/09/25	ASA	Conduct research relating to deponents from district court case for EB and KH in support of summary judgment briefing (0.8); attention to detailed tracking of deadlines set by S.D. Texas Bankruptcy Court (0.2).	1.00	350.00	350.00
7/10/25	EB	Continue working on summary judgment motion (2.0); and estimation motion (0.3); correspond with prospective client witness regarding status (0.1).	2.40	1250.00	3,000.00
7/11/25	EB	Correspond with ASA regarding documents and potential exhibits for summary judgment motion.	.20	1250.00	250.00
7/11/25	NC	Attention to detailed tracking of recent filings and hearing materials.	.50	350.00	175.00
7/11/25	ASA	Prepare materials for EB in support of drafting of motion for summary judgment and motion for estimation.	3.20	350.00	1,120.00
7/13/25	EB	Continue working on summary judgment motion.	1.20	1250.00	1,500.00
7/15/25	EB	Work on summary judgment motion.	2.00	1250.00	2,500.00

Stris & Maher LLP

Invoice # 14650 August 7, 2025

Date	Tkpr	Description	Hours	Rate	Amount
7/15/25	NC	Assist EB with preparation of additional materials for summary judgmetn motion.	.70	350.00	245.00
7/16/25	EB	Prepare for (0.5) and attend (0.8) teleconference with clients regarding upcoming briefing and next steps in support of hearing preparation; correspond with [redacted] experts regarding upcoming hearing (0.2); continue working on summary judgment briefing (1.1).	2.60	1250.00	3,250.00
7/16/25	NC	Continue assisting EB with additional materials in support of summary judgment motion and hearing.	.90	350.00	315.00
7/16/25	PB	Assess and assist EB with action items in support of hearing preparation.	.20	850.00	170.00
7/17/25	EB	Correspond with [redacted] expert regarding upcoming hearing.	.10	1250.00	125.00
7/18/25	EB	Prepare (0.2) for and attend (0.5) teleconference with [redacted] expert; update client and co-counsel regarding same (0.1); continue working on summary judgment motion and hearing preparation (1.5).	2.30	1250.00	2,875.00
7/20/25	EB	Review and respond to correspondence from co-counsel and client regarding expert.	.10	1250.00	125.00
7/21/25	EB	Confer with KH regarding status and action items in support of summary judgment motion, Rule 11 motion, and hearing preparation including expert retention (0.3); correspond with [redacted] expert regarding same (0.2); continue working on summary judgment brief (4.0).	4.50	1250.00	5,625.00
7/21/25	KJH	Teleconference with EB regarding brief in support of summary judgment motion in bankruptcy court.	.30	1100.00	330.00
7/21/25	NC	Assist EB and ASA with upcoming filing.	.40	350.00	140.00
7/21/25	ASA	Assist EB (2.4) and KH (0.4) with drafting of portions and collection and analysis of material including district court briefing and expet reports in support of summary judgment motion.	2.80	350.00	980.00

Stris & Maher LLP

Invoice # 14650 August 7, 2025

Date	Tkpr	Description	Hours	Rate	Amount
7/22/25	EB	Work on declaration in support of summary judgment motion (0.6); continue drafting brief in support of same (4.9); correspond with KH, PB, ASA, and NC regarding action items in support of same (0.2); attend teleconference with KH, ASA, and NC regarding same (0.4).	6.10	1250.00	7,625.00
7/22/25	KJH	Teleconference with EB, ASA, and NC regarding preparation of motion for summary judgment in bankruptcy court.	.40	1100.00	440.00
7/22/25	NC	Attend teleconference with EB, KH, and ASA regarding action items in support of preparation of motion for summary judgment in bankruptcy court.	.40	350.00	140.00
7/22/25	ASA	Teleconference with EB, KH, and NC regarding preparation of motion for summary judgment in bankruptcy court (0.4); review initial draft of motion for summary judgment and prepare additional exhibits requested by EB (1.6).	2.00	350.00	700.00
7/23/25	EB	Continue revising summary judgment motion (1.5); correspond with KH, PB, ASA, and NC regarding further revisions to same (0.2).	1.70	1250.00	2,125.00
7/23/25	KJH	Review and revise draft motion for summary judgment and confer and correspond with EB regarding same.	9.20	1100.00	10,120.00
7/23/25	NC	Compile and qc supporting documents for Brannen Declaration in support of summary judgment motion.	2.80	350.00	980.00
7/23/25	PB	Draft portions of motion for summary judgment in bankruptcy proceeding (3.8); review correspondence from EB regarding same (0.2).	4.00	850.00	3,400.00
7/23/25	ASA	Assist PB with further drafting and revisions to summary judgment motion.	1.10	350.00	385.00
7/24/25	EB	Review Midas subpoenas to Chase and Cameron Blackmon and correspond with K. Halpern, P. Tomasco, and clients regarding same (0.3); further revise summary judgment motion (0.6).	.90	1250.00	1,125.00
7/24/25	KJH	Review Midas subpoenas to Chase and Cameron Blackmon and correspond with E. Brannen, P. Tomasco, [redacted], and [redacted] regarding same (0.3); further revise motion for summary judgment (4.5).	4.80	1100.00	5,280.00

Stris & Maher LLP

Invoice # 14650 August 7, 2025

Date	Tkpr	Description	Hours	Rate	Amount
7/24/25	NC	Continue compiling and reviewing documents for Brannen declaration.	1.10	350.00	385.00
7/24/25	PB	Draft motion for summary judgment on Midas's bankruptcy claims.	1.30	850.00	1,105.00
7/24/25	ASA	Draft and revise declaration in support of summary judgment motion as instructed by EB.	3.10	350.00	1,085.00
7/25/25	EB	Correspond with KH, PB, ASA, and NC regarding revisions to and next steps in support of summary judgment motion and supporting documents (0.2); review correspondence from KH and R. Harrington regarding estimation motion (0.1).	.30	1250.00	375.00
7/25/25	KJH	Review and revise draft motion to estimate and correspond with R. Harrington, EB and PB regarding same (0.8); correspond with EB, PB, AA, R. Harrington and P. Tomasco regarding revisions to draft motion for summary judgment (0.4).	1.20	1100.00	1,320.00
7/25/25	NC	Continue revising supporting declaration for summary judgment motion.	.30	350.00	105.00
7/25/25	ASA	Assist KH with further revisions to draft summary judgment motion (4.1); compile additional District Court documents in preparation for use as exhibits (1.5).	5.60	350.00	1,960.00
7/25/25	MV	Correspond with PB regarding Relativity vendor and document status.	.10	425.00	42.50
7/26/25	PB	Revise draft motion for summary judgment on Midas bankruptcy claims for patent infringement.	1.00	850.00	850.00
7/27/25	KJH	Further revise motion for summary judgment of noninfringement.	1.50	1100.00	1,650.00
7/28/25	EB	Continue working on summary judgment motion and supporting documents (3.7); correspond with PB regarding additional research in support of damages section of same (0.2); review and comment on estimation motion (1.9); advise KH, PB, ASA, and NC regarding next steps in support of same and supporting Brannen declaration and documents (0.4).	6.20	1250.00	7,750.00
7/28/25	KJH	Correspond with EB and ASA regarding revisions to summary judgment motion.	.20	1100.00	220.00

Stris & Maher LLP

Invoice # 14650 August 7, 2025

Date	Tkpr	Description	Hours	Rate	Amount
7/28/25	NC	Continue assisting attorneys with further revisions to summary judgment motion and supporting documents including review of previously submitted jury instructions as requested by EB.	2.30	350.00	805.00
7/28/25	PB	Continue revising draft motion for summary judgment on Midas patent claims for bankruptcy court.	2.90	850.00	2,465.00
7/28/25	ASA	Continue assisting attorneys with further revisions to summary judgment motion and supporting declaration.	4.30	350.00	1,505.00
7/29/25	EB	Review and further revise summary judgment motion (2.3); review and revise supporting Brannen declaration (0.5); communicate with R. Harrington, KH, PB, ASA, and NC regarding next steps in support of same including preparation of proposed order, confirmation of applicable procedures, final review and revisions, and redactions from brief (0.4); review revised estimation motion and correspond with R. Harrington regarding further revisions to same (0.2); analyze next steps regarding Midas subpoenas in GRC case and correspond with client and co-counsel regarding same (0.2).	3.60	1250.00	4,500.00
7/29/25	NC	Assist ASA with legal cite checking of summary judgment motion (3.9); prepare and revise proposed order in support of same as directed by EB (0.3).	4.20	350.00	1,470.00
7/29/25	PB	Revise, finalize, and oversee filing of motion for summary judgment on Midas bankruptcy claims regarding patent infringement.	2.10	850.00	1,785.00
7/29/25	ASA	Assist PB with final revisions to, and cite checking and compilation of summary judgment and voluminous supporting materials (10.0); correspond and coordinate with R. Harrington and B. Howell regarding finalization and filing of same (0.5).	10.50	350.00	3,675.00
7/30/25	EB	Correspond with PB, ASA, and NC regarding high priority action items including compilation of recent filings for [redacted] expert and hearing preparation (0.5); attend teleconference with C. Underwood regarding upcoming hearing and Midas subpoenas (0.1); review and respond to client correspondence regarding service of subpoena and analyze next steps to oppose and potentially quash same (0.3); prepare for hearing (1.0).	1.90	1250.00	2,375.00

Stris & Maher LLP

Invoice # 14650 August 7, 2025

Date	Tkpr	Description	Hours	Rate	Amount
7/30/25	ASA	Compile materials for [redacted] expert as requested by EB (2.7); correspond with B. Howell regarding proof of service of sealed documents (0.3); begin assembling materials for EB for use at upcoming August 22 hearing (0.6).	3.60	350.00	1,260.00
7/31/25	EB	Correspond with Stris team, clients, and P. Tomasco regarding high priority action items (0.5); attend teleconference with [redacted] expert regarding status and upcoming hearing (0.2); work on sanctions motion (0.3), hearing preparation (0.5), and opposition to Midas subpoena to Chase Blackmon in GRC case (0.6).	2.10	1250.00	2,625.00
7/31/25	KJH	Research and work on drafting sanctions motion.	5.50	1100.00	6,050.00
7/31/25	ASA	Assist KH with requested legal research including regarding Rule 11 and Federal Rule of Bankruptyc Procedure 9011.	1.40	350.00	490.00
7/31/25	MV	Update EB regarding Relativity vendor status and terms with respect to documents potentially needed for upcoming hearing.	.20	425.00	85.00
		TOTAL PROFESSIONAL SERVICES			**$ 147,572.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	63.70	1,250.00	79,625.00
Tillman Breckenridge	TB	Partner	3.10	1,200.00	3,720.00
Ken Halpern	KJH	Partner	31.60	1,100.00	34,760.00
Peter Brody	PB	Associate	11.50	850.00	9,775.00
Monica Viramontes	MV	Sr Paralegal	.30	425.00	127.50
Andrew Atsalis	ASA	Fellow	42.30	350.00	14,805.00
Nicholas Capalbo	NC	Fellow	13.60	350.00	4,760.00
Total			**166.10**		**$ 147,572.50**

Stris & Maher LLP

Invoice # 14650 August 7, 2025

EXPENSES ADVANCED

Date	Task	Description	Amount
6/30/25		JND Discovery Invoice for June 2025.	3,765.00
7/07/25		EB lodging for hearing in Houston.	946.81
7/08/25		EB transportation for hearing in Houston.	42.43
7/09/25		EB transportation for hearing in Houston.	43.34
7/11/25		Document printing for hearing.	47.04
		TOTAL EXPENSES ADVANCED	**$ 4,844.62**
		TOTAL THIS INVOICE	**$ 152,417.12**

Stris & Maher LLP

Invoice # 14650 August 7, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14614	7/16/25	83,677.36	67,905.37	15,771.99

Previous Balance	$ 15,771.99
Balance Due This Invoice	$ 152,417.12
TOTAL BALANCE DUE	**$ 168,189.11**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 15,771.99	$ .00	$ .00	$ .00	$ .00	$ 15,771.99

Stris

August 7, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14638
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through July 31, 2025

RE: Whinstone Litigation

Total Professional Services	$ 2,485.00
Total Expenses Advanced	$ 542.41
TOTAL THIS INVOICE	**$ 3,027.41**
Previous Balance	$ 26,798.50
TOTAL BALANCE DUE	**$ 29,825.91**

Trust Funds Remaining on Account $ 115,369.59

Electronic Invoice

Stris & Maher LLP

Invoice # 14638 August 7, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
7/01/25	MV	Continue working on final client data export.	5.00	425.00	2,125.00
7/08/25	BA	Review ruling on motion to update LCK retention application and attend to final action items including client update.	.30	1200.00	360.00
		TOTAL PROFESSIONAL SERVICES			**$ 2,485.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Bridget Asay	BA	Partner	.30	1,200.00	360.00
Monica Viramontes	MV	Sr Paralegal	5.00	425.00	2,125.00
Total			**5.30**		**$ 2,485.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
6/23/25		Vendor fee for hearing document printing.	542.41
		TOTAL EXPENSES ADVANCED	**$ 542.41**
		TOTAL THIS INVOICE	**$ 3,027.41**

Stris & Maher LLP

Invoice # 14638 August 7, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14602	7/16/25	140,480.66	113,682.16	26,798.50
		Previous Balance		$ 26,798.50
		Balance Due This Invoice		$ 3,027.41
		TOTAL BALANCE DUE		**$ 29,825.91**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 26,798.50	$ .00	$ .00	$ .00	$ .00	$ 26,798.50

Stris

August 7, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14651
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through July 31, 2025

RE: Retention and Fee Applications

Total Professional Services	$ 5,822.50
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 5,822.50**
Previous Balance	$ 1,445.50
TOTAL BALANCE DUE	**$ 7,268.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14651 August 7, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
7/01/25	CHH	Assist VO with drafting and preparing third interim fee application and supporting documents.	4.80	350.00	1,680.00
7/08/25	VO	Review and revise CH draft of quarterly fee application.	.70	1025.00	717.50
7/08/25	CHH	Review and analyze docket materials and B. Howell (Quinn) email pertaining to plan status and draft section of third interim fee application regarding same.	.30	350.00	105.00
7/13/25	EB	Begin preparing monthly fee statement.	.80	1250.00	1,000.00
7/15/25	EB	Work on portions of monthly fee statement.	.80	1250.00	1,000.00
7/16/25	EB	Continue preparing portions of monthly fee statement.	.40	1250.00	500.00
7/17/25	VO	Prepare June fee application.	.80	1025.00	820.00
		TOTAL PROFESSIONAL SERVICES			**$ 5,822.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	2.00	1,250.00	2,500.00
Victor O'Connell	VO	Partner	1.50	1,025.00	1,537.50
Cynthia Huang	CHH	Fellow	5.10	350.00	1,785.00
Total			**8.60**		**$ 5,822.50**

TOTAL THIS INVOICE **$ 5,822.50**

Stris & Maher LLP

Invoice # 14651 August 7, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14615	7/16/25	7,227.50	5,782.00	1,445.50

Previous Balance	$ 1,445.50
Balance Due This Invoice	$ 5,822.50
TOTAL BALANCE DUE	**$ 7,268.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 1,445.50	$ .00	$ .00	$ .00	$ .00	$ 1,445.50

Stris

August 7, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14652
Client # 00346
Matter # 008

INVOICE SUMMARY

For professional services rendered through July 31, 2025

RE: Non-working Travel for Whinstone Dispute

Total Professional Services	$ 10,000.00
50% discount	$ -5,000.00
Net Professional Services	$ 5,000.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 5,000.00**
Previous Balance	$ 664.00
TOTAL BALANCE DUE	**$ 5,664.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14652 August 7, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
7/07/25	EB	Travel to Houston for hearing on objection to Midas claim.	2.20	1250.00	2,750.00
7/09/25	EB	Return travel from Houston hearing.	5.80	1250.00	7,250.00

TOTAL PROFESSIONAL SERVICES	**$ 10,000.00**
50% discount	$ -5,000.00
NET PROFESSIONAL SERVICES	**$ 5,000.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	8.00	1,250.00	10,000.00
Total			**8.00**		**$ 10,000.00**

TOTAL THIS INVOICE **$ 5,000.00**

Stris & Maher LLP

Invoice # 14652 August 7, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14630	7/16/25	3,320.00	2,656.00	664.00

Previous Balance	$ 664.00
Balance Due This Invoice	$ 5,000.00
TOTAL BALANCE DUE	**$ 5,664.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ 664.00	$ .00	$ .00	$ .00	$ .00	$ 664.00

Case 24-90448 Document 1639 Filed in TXSB on 09/12/25 Page 1 of 26
Docket #1639 Date Filed: 09/12/2025

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

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

STRIS MAHER LLP'S T ELFTH MONTHLY FEE STATEMENT
FOR THE PERIOD AUGUST 1, 2025, THROUGH AUGUST 1, 2025

Stris & Maher LLP ("Stris & Maher") submits, pursuant to the Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the "Interim Compensation Order") (ECF No. 264) entered on October 14, 2024, this monthly fee statement for the payment of interim compensation rendered and reimbursement of expenses incurred during the period August 1, 2025, through August 31, 2025 (the "Monthly Fee Statement").

Stris & Maher seeks payment of interim compensation in the total amount of $188,408.00 (80 of the services rendered), plus $1,258.81 (100 of the interim expenses incurred). *ee* Interim Compensation Order at 1(a). Summaries of the fees and expenses are attached as Exhibits 1, 2, and 3. Invoices reflecting detailed time entries are attached hereto as Exhibit 4.

[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), 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.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall serve within 14 days after delivery of the Monthly Fee Statement a written notice, via email, upon Stris & Maher and each of the other Fee Notice Parties (as listed below) (the "Written Notice"). The Written Notice shall set forth with reasonable detail the nature of the objection and the amount at issue. If the parties are unable to reach a resolution of the objection within 14 calendar days, the objecting party shall file its objection (the "Objection") with this Court within 3 business days and serve such Objection on Stris & Maher and each of the other Fee Notice Parties. See Interim Compensation Order 1(c).

The Fee Notice Parties as defined in the Interim Compensation Order are:

a. Rhodium Enterprises, Inc., Attn: Charles Topping (chucktopping rhdm.com) and Morgan Soule (morgansoule rhdm.com), 2617 Bissonnet Street, Suite 234, Houston, Texas 77005;

b. Debtors' Bankruptcy Counsel, c/o Quinn Emanuel Urquhart & Sullivan, LLP, Attn: Patricia B. Tomasco (pattytomasco quinnemanuel.com); Razmig Izakelian (razmigizakelian quinnemanuel.com), Alain Jaquet (alainjaquet quinnemanuel.com), and Joanna D. Caytas (joannacaytas quinnemanuel.com), 700 Louisiana, Suite 3900, Houston, Texas 77002;

c. Debtors' Financial Advisor, c/o Province, Attn: Mark Robinson (mrobinson provincefirm.com); David Dunn (ddunn provincefirm.com); Kirsten Lee (klee province.com); and Andrew Popescu (apopescu provincefirm.com), 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074;

d. Galaxy Digital, LLC, in its capacity as DIP Agent, c/o Orrick, Herrington & Sutcliffe LLP, Ryan C. Wooten (rwooten orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust orrick.com), Mark Franke (mfranke orrick.com) and Brandon Batzel (bbatzel orrick.com), 51 West 52nd Street, New ork, New ork 10019;

e. Counsel or proposed counsel to any statutory committee appointed in these Chapter 11 Cases; and

f. United States Trustee, Ha Minh Nguyen (ha.nguyen usdoj.gov), 515 Rusk, Suite 3516, Houston, Texas 77002.

If no objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Stris & Maher an amount equal to 80 of the fees and 100 of the expenses listed herein, or if an objection is timely served, such percentage of fees and expenses that are not subject to an objection, as stated in the Interim Compensation Order.

Respectfully submitted this 12th day of September, 2025.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ atricia . Tomasco
Patricia B. Tomasco (SBN 01797600)
Cameron Kelly (SBN 24120936)
Alain Jaquet (*pro hac vice*
700 Louisiana Street, Suite 3900
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Facsimile: 713-221-7100
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Email: cameronkelly quinnemanuel.com
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Razmig Izakelian (*pro hac vice*)
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Los Angeles, California 90017
Telephone: 213-443-3000
Facsimile: 213-443-3100
Email: ericwinston quinnemanuel.com
Email: razmigizakelian quinnemanuel.com

-and-

STRIS & MAHER LLP

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Victor O'Connell (*pro hac vice*)
John Stokes (*pro hac vice*)
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Email: cmith stris.com

CERTIFICATE OF SERVICE

I certify that, on September 12, 2025, a true and correct copy of the foregoing Monthly Fee Statement was served through the Court's Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas.

/s/ atricia . Tomasco
Patricia B. Tomasco

EXHIBIT 1

S r L F r F P r d

M r	M r D r	T H r	T F	80 F
001	Midas Green Patent Litigation	257.4	$232,210.00	$185,768.00
007	Retention and Fee Applications	3.0	$3,300.00	$2,640.00
Total		260.4	$235,510.00	$188,408.00

EXHIBIT 2

S r H r B d S r M r A r d P r r

M d Gr P L

Pr	P A	Y r Ad d	H r R	T H r	T C
Elizabeth Brannen	Managing Partner	2001	1,250.00	75.20	$94,000.00
Ken Halpern	Partner	1997	1,100.00	78.30	$86,130.00
Peter Brody	Associate	2016	850.00	20.90	$17,765.00
Tanya Tice	Staff Attorney	1989	525.00	30.00	$15,750.00
Monica Viramontes	Senior Paralegal	N/A	425.00	.20	$85.00
Andrew Atsalis	Litigation Fellow	N/A	350.00	47.30	$16,555.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	5.50	$1,925.00

R d F A

Pr	P A	Y r Ad d	H r R	T H r	T C
Elizabeth Brannen	Managing Partner	2001	1,250.00	1.90	$2,375.00
Victor O'Connell	Partner	2012	1,025.00	.80	$820.00
Cynthia Huang	Litigation Fellow	N/A	350.00	.30	$105.00

EXHIBIT

S r E r F P r d

M d Gr P L

E	A
Travel	$557.00
Printing services	$701.81
Total	**1,258.81**

EXHIBIT 4

Stris

September 12, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14680
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through August 31, 2025

RE: Midas Green Litigation

Total Professional Services	$ 232,210.00
Total Expenses Advanced	$ 1,258.81
TOTAL THIS INVOICE	**$ 233,468.81**
Previous Balance	$ 168,189.11
TOTAL BALANCE DUE	**$ 401,657.92**

Electronic Invoice

Stris & Maher LLP

Invoice # 14680 September 12, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
8/01/25	EB	Prepare for upcoming hearing and initial meeting with [redacted] expert regarding same (2.5); work on sanctions motion (0.4); correspond with client and Stris team regarding Midas subpoena and objections to same (0.1).	3.00	1250.00	3,750.00
8/01/25	KJH	Continue researching and drafting motion for sanctions against Midas, teleconference with E. Brannen regarding same and with A. Atsalis regarding supporting materials needed.	7.10	1100.00	7,810.00
8/01/25	NC	Attention to detailed tracking of deadlines and updating of case management materials in wake of recently served subpoenas.	.40	350.00	140.00
8/01/25	ASA	Prepare and finalize binder materials and correspond with print vendor to assist E. Brannen with preparations for August 22, 2025 hearing regarding motion for summary judgment (1.0); assist attorney K. Halpern format Rule 9011 motion (0.3).	1.00	350.00	350.00
8/02/25	EB	Correspond with K. Halpern and R. Harrington regarding sanctions motion (0.1); begin reviewing and commenting on same (0.6).	.70	1250.00	875.00
8/03/25	EB	Continue working on sanctions motion.	.80	1250.00	1,000.00
8/04/25	EB	Prepare for (0.9) and attend (1.2) initial preparation meeting with [redacted] expert; confer with TT regarding action items in support of hearing on objection to Midas proof of claim and estimation motion (0.2); correspond with K. Halpern and R. Harrington regarding sanctions motion and next steps in support of same (0.2); update client and co-counsel regarding damages expert (0.1); attend teleconference with K. Halpern and P. Brody regarding objections to Midas subpoena in the GRC case and potential motion to quash and sanctions motion (0.3); review client correspondence regarding subpoena (0.1); continue preparing for upcoming hearing on summary judgment motion (1.9).	4.90	1250.00	6,125.00

Stris & Maher LLP

Invoice # 14680 September 12, 2025

Date	Tkpr	Description	Hours	Rate	Amount
8/04/25	KJH	Attend teleconference with [redacted] expert [redacted] and E. Brannen regarding preparation for [redacted] testimony at hearing Midas's patent infringement claims (1.2); attend teleconference with E. Brannen and P. Brody regarding response to Midas subpoenas on Cameron and Chase Blackmon (0.3).	1.50	1100.00	1,650.00
8/04/25	NC	Research regarding previously filed subpoena objections; correspond with E. Brannen regarding same.	.30	350.00	105.00
8/04/25	PB	Teleconference with EB regarding response to Blackmon subpoenas	.30	850.00	255.00
8/04/25	TT	Prepare analysis and materials to assist E. Brannen with upcoming hearing.	6.00	525.00	3,150.00
8/05/25	EB	Correspond with client regarding Midas v. GRC subpoena service and objections (0.1); continue preparing for hearing on motion to estimate and summary judgment on Midas claims (5.0); review and comment on draft Rule 11 letter (0.2); correspond with K. Halpern and R. Harrington regarding revisions to and next step in support of sanctions motion (0.1); correspond with client and damages expert regarding upcoming hearing (0.1).	5.50	1250.00	6,875.00
8/05/25	KJH	Correspond with E. Brannen and R. Harrington (Quinn) regarding revisions to draft motion for sanctions (0.1); review [redacted] expert report on [redacted] and correspond with E. Brannen, A. Atsalis, and P. Brody regarding images to be used for summary judgment hearing (0.3); research and begin drafting motion to quash Midas subpoena (2.4).	2.80	1100.00	3,080.00
8/05/25	PB	Analyze potential exhibits for use at bankruptcy hearing.	.40	850.00	340.00
8/05/25	TT	Continue preparing materials to assist E. Brannen with upcoming hearing scheduled for August 22.	8.00	525.00	4,200.00
8/06/25	EB	Correspond with R. Harrington regarding revisions to and next steps in support of sanctions motion and P. Tomasco regarding remote hearing sealing of proprietary exhibits (0.1); prepare for (1.4) and attend (1.5) preparation meeting for upcoming hearing with clients; begin revising direct examination materials in light of same (1.3); instruct Stris team members regarding action items in support of same (0.5).	4.80	1250.00	6,000.00

Exhibit L, Page 012

Stris & Maher LLP

Invoice # 14680 September 12, 2025

Date	Tkpr	Description	Hours	Rate	Amount
8/06/25	KJH	Review draft motion for sanctions and correspond with R. Harrington and E. Brannen regarding revisions to, and plan for, same (0.3); research and draft motion to quash subpoenas to Chase and Cameron Blackmon (3).	3.30	1100.00	3,630.00
8/06/25	NC	Research regarding previous filings in Bankruptcy Court and corresponding filings in District Court to support hearing preparation.	2.20	350.00	770.00
8/06/25	ASA	Review and analyze expert reports, briefing, exhibits, produced documents, and internal records for specific material, including images of specific components of allegedly infringing device, requested by E. Brannen in preparation for presentation and witness testimony during August 22, 2025 hearing.	3.80	350.00	1,330.00
8/06/25	TT	Prepare materials to assist E. Brannen with upcoming hearing on August 22 (8.0).	8.00	525.00	4,200.00
8/07/25	EB	Work on materials in support of client direct examination at upcoming hearing (1.7); continue preparing for hearing (2.0); review correspondence from R. Harrington regarding revised sanctions motion (0.1); correspond with B. Harrington and Stris team regarding exhibit and witness lists and sealing of exhibits (0.1).	3.90	1250.00	4,875.00
8/07/25	NC	Update E. Brannen regarding research into previous filings in Bankruptcy Court and corresponding filings in District Court to support hearing preparation.	.70	350.00	245.00
8/07/25	PB	Draft response to subpoena to Chase Blackmon in Midas Green patent litigation.	.70	850.00	595.00
8/07/25	TT	Continue preparing materials to assist E. Brannen with upcoming hearing scheduled for August 22.	8.00	525.00	4,200.00
8/07/25	MV	Review correspondence from attorney E. Brannen related to contract with vendor, review previous correspondence with vendor and upload contract to iManage.	.20	425.00	85.00

Stris & Maher LLP

Invoice # 14680 September 12, 2025

Date	Tkpr	Description	Hours	Rate	Amount
8/08/25	EB	Review correspondence from counsel for Midas regarding subpoenas to Chase and Cameron Blackmon in GRC case and correspond with K. Halpern, P. Brody, A. Atsalis, and N. Capalbo regarding next steps in support of response, opposition, and potential motion to quash same (0.2); continue preparing for upcoming hearing including revising client materials, corresponding with client, and preparing expert materials (6.1).	6.30	1250.00	7,875.00
8/08/25	PB	Revise draft responses and objections to Midas Green subpoena to Chase Blackmon.	.50	850.00	425.00
8/08/25	ASA	Assist P. Brody with drafting and formatting of objections to subpoenas to Cameron Blackmon and Chase Blackmon requesting documents from Midas Green Technologies v. Rhodium case and documents related to patent asserted by Midas.	1.50	350.00	525.00
8/10/25	EB	Correspond with P. Brody regarding revisions to objections to Midas subpoenas to Chase and Cameron Blackmon in GRC case.	.50	1250.00	625.00
8/11/25	EB	Review and work on response to correspondence from counsel for Midas proposing amendments to proofs of claim in consultation with K. Halpern, P. Brody, P. Tomasco, and R. Harrington (0.7); communicate with K. Halpern and P. Brody regarding opposition to Chase and Cameron Blackmon subpoenas and motion to quash same (0.5); prepare for (1.5) and attend (1.8) further meeting with [redacted] expert to prepare for upcoming hearing.	4.50	1250.00	5,625.00
8/11/25	KJH	Prepare for (0.2) and attend (1.8) teleconference with E. Brannen and expert to prepare for 8/22 hearing on Midas's proof of claim; attend teleconference with E. Brannen and P. Brody regarding Midas subpoenas to Blackmons (0.5); research facts and law and draft motion to quash Midas subpoenas and correspond with A. Atsalis regarding record research needed for same (8.2).	10.70	1100.00	11,770.00
8/11/25	NC	Assist A. Atsalis with objections to Blackmon subpoena.	.10	350.00	35.00

Stris & Maher LLP

Invoice # 14680 September 12, 2025

Date	Tkpr	Description	Hours	Rate	Amount
8/11/25	PB	Revise response to subpoena to Chase Blackmon and prepare response to subpoena to Cameron Blackmon (0.8); communicate with E. Brannen and K. Halpern regarding same (0.6).	1.40	850.00	1,190.00
8/11/25	ASA	Assist K. Halpern with drafting of motion to quash by analyzing discovery requests, deposition transcripts, and deposition notices served in Midas Green v. Rhodium matter to identify duplicative content in subpoenas served on Chase Blackmon and Cameron Blackmon (2.8); assist P. Brody and E. Brannen with preparation of objections to subpoenas and motion to quash by conducting legal research into relevant granted motions by Judge Gilliland and in the Western District of Texas (3.3).	6.10	350.00	2,135.00
8/12/25	EB	Work with [redacted] expert, client, and co-counsel to respond to rescheduling correspondence from clerk (0.4); continue preparing for same (1.3); correspond with counsel for Midas in consultation with co-counsel and client regarding basis for objection to proposed amendments (0.5); revise objections to Midas subpoena to Chase and Cameron Blackmon in GRC case, serve, and correspond with counsel for Midas regarding same (1.4); review draft motion to quash (0.2); correspond with K. Halpern and A. Atsalis regarding initial revisions to same (0.1).	3.90	1250.00	4,875.00
8/12/25	KJH	Complete draft motion to quash subpoenas to Chase and Cameron Blackmon and correspond with E. Brannen and A. Atsalis regarding same.	4.80	1100.00	5,280.00
8/12/25	NC	Implement further K. Halpern edits to motion to quash subpoena; correspond with K. Halpern regarding same.	.80	350.00	280.00
8/12/25	ASA	Work on motion to quash subpoena to Chase Blackmon and Cameron Blackmon at request of K. Halpern (0.4); assist E. Brannen and P. Brody with finalization of objections and responses to subpoenas served on Cameron Blackmon and Chase Blackmon by Midas Green (1.8).	2.20	350.00	770.00

Stris & Maher LLP

Invoice # 14680 September 12, 2025

Date	Tkpr	Description	Hours	Rate	Amount
8/13/25	EB	Continue working on motion to quash subpoenas to Cameron and Chase Blackmon in GRC case (1.1); review and analyze Midas opposition briefs to estimation and summary judgment motions (1.0); correspond with Stris team and R. Harrington regarding research and action items in support of replies to same (0.2); begin working on reply in support of summary judgment motion (0.8); attend meet and confer teleconference with K. Halpern and opposing counsel H. Pogorzelski regarding subpoenas to Cameron and Chase Blackmon in GRC case (0.5); attention to resulting action items including client update and response to correspondence from opposing counsel (0.3); attend teleconference with K. Halpern, P. Brody, R. Harrington, and A. Atsalis regarding Midas oppositions and reply briefs (0.7); continue preparing for hearing on same including correspondence with clients and [redacted] and [redacted] experts (0.6).	5.20	1250.00	6,500.00
8/13/25	KJH	Review Midas opposition to motion for summary judgment (0.5); teleconference with E. Brannen, P. Brody and R. Harrington regarding Midas opposition to motion for summary judgment and planning for reply brief (0.7); revise draft motion to quash and research law and confer with E. Brannen and A. Atsalis regarding same (2.2); attend meet and confer teleconference with E. Brannen and H. Pogorzelski regarding meet and confer on subpoenas to Blackmon brothers (0.5); draft patent section of reply brief in support of motion for summary judgment (3.2).	7.10	1100.00	7,810.00
8/13/25	NC	No Charge - Travel research regarding flights and hotel rooms for upcoming hearing; correspond with E. Brannen and expert regarding same	1.20	350.00	N/C
8/13/25	PB	Communicate with E. Brannen regarding action items (0.2); revise draft motion to quash (1.7); teleconference with E. Brannen, K. Halpern, A. Atsalis, and R. Harrington [Quinn] regarding replies in support of motions (0.7).	2.60	850.00	2,210.00

Stris & Maher LLP

Invoice # 14680 September 12, 2025

Date	Tkpr	Description	Hours	Rate	Amount
8/13/25	ASA	Assist K. Halpern and E. Brannen with finalization of motion to quash by insert citations to supporting exhibits (0.8); proofread and cite check motion to quash (1.6); draft declaration in support of motion to quash at request of E. Brannen (1.2); prepare documents for use as exhibits in support of motion to quash (1.5); teleconference with E. Brannen, K. Halpern, P. Brody and R. Harrington regarding Midas opposition to motion for summary judgment and planning for reply brief (0.7); organize sealed opposition motions and supporting material filed by Midas Green and circulate with team and client at request of E. Brannen (0.2).	6.00	350.00	2,100.00
8/14/25	EB	Prepare for (0.2) and attend (0.4) client teleconference regarding high priority action items; continue preparing for hearing including revising expert materials and assessing Midas opposition points to refute with key evidence and testimony (3.2).	3.80	1250.00	4,750.00
8/14/25	KJH	Draft patent section of reply brief in support of motion for summary judgment.	6.30	1100.00	6,930.00
8/14/25	NC	No Charge - Attend to hotel and flight bookings for clients and expert.	3.40	350.00	N/C
8/14/25	PB	Draft reply in support of motion for summary judgment.	5.80	850.00	4,930.00
8/14/25	ASA	Analyze Midas Green's opposition to motion for summary judgment in order to assist with drafting of reply (0.6); file correspondence regarding narrowing of subpoenas to assist E. Brannen, P. Brody, and K. Halpern's with edits to motion to quash (0.2); calendar updated hearing date of September 23, 2025 (0.1).	.90	350.00	315.00
8/15/25	EB	Correspond with [redacted] expert and K. Halpern regarding hearing preparation.	.10	1250.00	125.00
8/15/25	KJH	Draft patent section of reply in support of motion for summary judgment and research law in support of same.	7.70	1100.00	8,470.00
8/15/25	NC	Compile and track recent filings for attorney analysis.	.40	350.00	140.00
8/15/25	PB	Revise portions of draft reply in support of motion for summary judgment.	2.00	850.00	1,700.00
8/16/25	EB	Review, analyze, and begin revising reply in support of summary judgment motion.	1.10	1250.00	1,375.00

Invoice # 14680 September 12, 2025

Date	Tkpr	Description	Hours	Rate	Amount
8/16/25	KJH	Complete initial draft of patent law section of reply in support of motion for summary judgment and research law in support of same.	5.20	1100.00	5,720.00
8/17/25	EB	Revise summary judgment reply (2.3); correspond with K. Halpern, P. Brody, and A. Atsalis regarding next steps in support of same (0.1).	2.40	1250.00	3,000.00
8/17/25	PB	Revise draft reply in support of motion for summary judgment.	.90	850.00	765.00
8/18/25	EB	Continue working on reply in support of summary judgment motion (4.7); advise K. Halpern regarding further revisions to same (0.1).	4.80	1250.00	6,000.00
8/18/25	KJH	Conduct additional research in support of and further revise reply brief in support of summary judgment motion including to implement E. Brannen comments.	6.90	1100.00	7,590.00
8/18/25	PB	Revise draft reply in support of motion for summary judgment.	1.20	850.00	1,020.00
8/18/25	ASA	Assist E. Brannen, K. Halpern, and P. Brody with edits to Debtors' Reply in Support of Motion for Summary Judgment by revising citations, formatting and phrasing of draft pursuant to attorney requests.	3.20	350.00	1,120.00
8/19/25	EB	Continue revising reply in support of summary judgment motion including to incorporate comments from clients and co-counsel (3.3); review and propose revisions to draft estimation reply (0.9); correspond with K. Halpern and R. Harrington regarding further revisions to same (0.1).	4.30	1250.00	5,375.00
8/19/25	KJH	Research case law and propose revisions to draft reply in support of motion to estimate (1.0); review and revise draft reply in support of summary judgment (1.4).	2.40	1100.00	2,640.00
8/19/25	ASA	Cite-check of and revise Debtors' Reply in Support of Motion for Summary Judgment at request of E. Brannen (4.8); assist with iterative edits and finalization of same and supporting documents (2.8).	7.60	350.00	2,660.00

Stris & Maher LLP

Invoice # 14680 September 12, 2025

Date	Tkpr	Description	Hours	Rate	Amount
8/20/25	EB	Attention to potential motion to quash subpoenas to Cameron and Chase Blackmon regarding Midas subpoena in GRC litigation given extended deadline and failure to narrow subpoena (0.4); communicate with K. Halpern and P. Brody regarding same (0.1).	.50	1250.00	625.00
8/21/25	EB	Correspond with (0.2) and attend teleconference with (0.5) K. Halpern, clients, and co-counsel regarding Midas position with respect to subpoenas to Cameron and Chase Blackmon; advise K. Halpern, P. Brody, and A. Atsalis regarding revisions to motion to quash (0.3); further revise same and supporting documents (0.9); continue preparing [redacted] expert materials in advance of upcoming teleconference to prepare for hearing (2.0).	3.90	1250.00	4,875.00
8/21/25	KJH	Attend teleconference with E. Brannen, [redacted] and [redacted] regarding response to Midas meet-and-confer email relating to subpoenas to Blackmons (0.5); research record and correspond with E. Brannen, P. Brody, and A. Atsalis regarding prior testimony of Chase Blackmon on GRC-related topics (0.5); review, comment on, research law for, and propose edits to draft motion to quash subpoena (3.3); review key points for [redacted] testimony and '457 patent to extract helpful material (1).	5.30	1100.00	5,830.00
8/21/25	NC	Correspond with E. Brannen, [redacted], Patty Tomasco, and Rachel Harrington regarding upcoming meeting.	.20	350.00	70.00
8/21/25	PB	Revise draft motion to quash including to implement comments from E. Brannen.	2.80	850.00	2,380.00
8/21/25	ASA	Assist E. Brannen, K. Halpern, and P. Brody with finalization of motion to quash subpoenas by editing, proofreading, inserting citations, and cite-checking iterative changes to draft (3.8); excerpt and highlight case materials for use as exhibits pursuant to local rules (1.2); draft revised declaration of [redacted] to ensure accurate listing of Rhodium entities and additional exhibits (1.1); coordinate with E. Brannen and implement final edits prior to filing (0.6); file motion to quash and supporting exhibits via ECF (0.5).	6.60	350.00	2,310.00

Exhibit L, Page 019

Stris & Maher LLP

Invoice # 14680 September 12, 2025

Date	Tkpr	Description	Hours	Rate	Amount
8/22/25	EB	Prepare for upcoming teleconference with [redacted] expert (1.0); correspond with expert, K. Halpern, P. Brody, and A. Atsalis regarding same and related action items (0.1); attend teleconference with K. Halpern, P. Brody, and A. Atsalis regarding same (0.7).	1.80	1250.00	2,250.00
8/22/25	PB	Attend portion of teleconference with E. Brannen, K. Halpern, and A. Atsalis regarding hearing preparation action items.	.50	850.00	425.00
8/22/25	ASA	Attend meeting with E. Brannen, K. Halpern, and P. Brody regarding preparation and support for upcoming [redacted] expert meeting (0.7); organize case management and detailed tracking materials to reflect recent case activity and ensure attorney organization in advance of upcoming hearing (0.1).	.80	350.00	280.00
8/23/25	KJH	Review asserted '457 patent and propose additions to expert hearing testimony.	1.00	1100.00	1,100.00
8/23/25	KJH	Attend teleconference with E. Brannen, P. Brody and A. Atsalis regarding planning for Rhodium summary judgment hearing and outstanding tasks (0.5); draft correspondence with Midas counsel H. Pogorzelski regarding motion to quash subpoena (0.9).	1.40	1100.00	1,540.00
8/25/25	EB	Continue preparing for hearing including upcoming preparation meeting with [redacted] expert (1.0); correspond with K. Halpern, P. Brody, and A. Atsalis regarding updates to materials in support of same (0.2).	1.20	1250.00	1,500.00
8/25/25	PB	Revise draft engagement letter for damages expert J. Saitz.	.50	850.00	425.00
8/26/25	EB	Continue preparing for (1.0) and attend (1.7) hearing preparation meeting with K. Halpern, P. Brody, A. Atsalis, and [redacted] expert.	2.70	1250.00	3,375.00
8/26/25	KJH	Attend teleconference with [redacted] expert [redacted], E. Brannen, P. Brody, and A. Atsalis regarding preparation for summary judgment and evidentiary hearing.	1.70	1100.00	1,870.00
8/26/25	ASA	Attend hearing preparation meeting with E. Brannen, K. Halpern, P. Brody, A. Atsalis, and [redacted] expert (1.7); prepare presentation and assist with edits to motion for summary judgment presentation at request of E. Brannen (2.2).	3.90	350.00	1,365.00

Stris & Maher LLP

Invoice # 14680 September 12, 2025

Date	Tkpr	Description	Hours	Rate	Amount
8/27/25	EB	Review and correspond with clients and co-counsel regarding narrowed Midas GRC subpoena proposal (0.1); attend teleconference with P. Brody and clients to discuss response to same (0.3); correspond with (0.1) and attend meet and confer teleconference with (0.5) K. Halpern and counsel to Midas in GRC case concerning same (0.5); attention to resulting action items including client update and correspondence with opposing counsel to confirm extension (0.1); prepare for next meeting with [redacted] expert (0.5).	2.00	1250.00	2,500.00
8/27/25	KJH	Attend teleconference with E. Brannen and Midas counsel H. Pogorzelski to meet and confer about Midas subpoenas to Chase and Cameron Blackmon (0.5); review Pokharna infringement report for doctrine-of-equivalents arguments (1.1).	1.60	1100.00	1,760.00
8/27/25	PB	Attend teleconference with clients and E. Brannen regarding response to Midas subpoena in GRC litigation.	.30	850.00	255.00
8/28/25	EB	Correspond with [redacted] expert (0.1); attend teleconference with K. Halpern, P. Brody, and A. Atsalis to revise materials for [redacted] expert direct examination (1.0).	1.10	1250.00	1,375.00
8/28/25	KJH	Attend teleconference with E. Brannen, P. Brody and A. Atsalis regarding [redacted] direct examination hearing [redacted] (1); correspond with A. Atsalis regarding scheduling (0.1); confer with A. Atsalis regarding edits to [redacted] (0.4).	1.50	1100.00	1,650.00
8/28/25	PB	Teleconference with E. Brannen, K. Halpern, and A. Atsalis regarding preparation for hearing on motion for summary judgment.	1.00	850.00	850.00
8/28/25	ASA	Attend teleconference with E. Brannen, K. Halpern, and P. Brody regarding [redacted] direct examination hearing [redacted] (1); correspond with K. Halpern regarding scheduling (0.1); confer with K. Halpern regarding edits to [redacted] direct exam materials (0.4); edit same as directed by K. Halpern (0.6)..	2.10	350.00	735.00
8/29/25	EB	Review Midas motion to amend claim and related correspondence with co-counsel (0.2); correspond with K. Halpern, P. Brody, and A. Atsalis regarding high priority action items (0.2); continue preparing for hearing on opposition to Midas claim (1.1).	1.50	1250.00	1,875.00

Stris & Maher LLP

Invoice # 14680 September 12, 2025

Date	Tkpr	Description	Hours	Rate	Amount
8/29/25	NC	Work on upcoming hearing materials for E. Brannen.	.40	350.00	140.00
8/29/25	ASA	Assist P. Brody with analysis of District Court Motion to Exclude [redacted] (0.2); assist E. Brannen with analysis of Midas Green's motion for leave to file amended proof of claims (0.3); calculate and perform detailed tracking of deadlines triggered by Midas Green's motion and calendar deadlines related to subpoenas to Cameron and Chase Blackmon (0.2); continue edits to direct examination materials and circulate with E. Brannen, K. Halpern, and P. Brody (0.9).	1.60	350.00	560.00
		TOTAL PROFESSIONAL SERVICES			**$ 232,210.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	75.20	1,250.00	94,000.00
Ken Halpern	KJH	Partner	78.30	1,100.00	86,130.00
Peter Brody	PB	Associate	20.90	850.00	17,765.00
Tanya Tice	TT	Staff Attorney	30.00	525.00	15,750.00
Monica Viramontes	MV	Sr Paralegal	.20	425.00	85.00
Andrew Atsalis	ASA	Fellow	47.30	350.00	16,555.00
Nicholas Capalbo	NC	Fellow	5.50	350.00	1,925.00
Total			**257.40**		**$ 232,210.00**

EXPENSES ADVANCED

Date	Task	Description	Amount
8/12/25		Vendor fee for preparation of briefing binders.	701.81
8/15/25		EB airfare for 09/23 hearing.	557.00
		TOTAL EXPENSES ADVANCED	**$ 1,258.81**
		TOTAL THIS INVOICE	**$ 233,468.81**

Stris & Maher LLP

Invoice # 14680 September 12, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14614	7/16/25	83,677.36	67,905.37	15,771.99
14650	8/07/25	152,417.12	.00	152,417.12

Previous Balance	$ 168,189.11
Balance Due This Invoice	$ 233,468.81
TOTAL BALANCE DUE	**$ 401,657.92**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 168,189.11	$ .00	$ .00	$ .00	$ 168,189.11

Stris

September 12, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14681
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through August 31, 2025

RE: Retention and Fee Applications

Total Professional Services	$ 3,300.00
Total Expenses Advanced	$ .00
TOTAL THIS INVOICE	**$ 3,300.00**
Previous Balance	$ 7,268.00
TOTAL BALANCE DUE	**$ 10,568.00**

Electronic Invoice

Stris & Maher LLP

Invoice # 14681 September 12, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
8/05/25	EB	Begin working on portions of monthly fee statement.	.40	1250.00	500.00
8/06/25	EB	Continue working on portions of monthly fee statement.	.60	1250.00	750.00
8/07/25	EB	Continue working on portions of monthly fee statement.	.90	1250.00	1,125.00
8/07/25	NC	Assist E. Brannen in preparation of monthly fee statements.	.30	350.00	105.00
8/19/25	VO	Prepare monthly fee application (0.7); emails with B. Howell and to serve application (0.1).	.80	1025.00	820.00
		TOTAL PROFESSIONAL SERVICES			**$ 3,300.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	1.90	1,250.00	2,375.00
Victor O'Connell	VO	Partner	.80	1,025.00	820.00
Nicholas Capalbo	NC	Fellow	.30	350.00	105.00
Total			**3.00**		**$ 3,300.00**

TOTAL THIS INVOICE **$ 3,300.00**

Stris & Maher LLP

Invoice # 14681 September 12, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14615	7/16/25	7,227.50	5,782.00	1,445.50
14651	8/07/25	5,822.50	.00	5,822.50

Previous Balance	$ 7,268.00
Balance Due This Invoice	$ 3,300.00
TOTAL BALANCE DUE	**$ 10,568.00**

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
$ .00	$ 7,268.00	$ .00	$ .00	$ .00	$ 7,268.00

FEES INCURRED BY QUINN EMANUEL REGARDING
THE MIDAS TECHNOLOGY CLAIM OBJECTION

DATE	QE	NARRATIVE	HOURS	HOURLY RATE	AMOUNT
2/5/25	RH	Draft Midas claim objection	3.4	$1,165.00	$3,961.00
2/6/25	RH	Revisions to the Midas claim objection	.9	$1,165.00	$1,048.50
2/6/25	RH	Legal research to support review of district court order in Midas litigation	2.5	$1,165.00	$2,912.50
3/7/25	RH	Revise the Midas claim objection	2.0	$1,165.00	$2,330.00
3/13/25	RH	Proof Midas claim objection and order	.8	$1,165.00	$932.00
4/10/25	RH	Revisions to Midas Green Claim objection (.8); draft motion to seal and order (1.1)	1.9	$1,165.00	$2,213.50
4/14/25	PT	Correspond with E. Brannen and C. Topping regarding filing Midas Green claim objection in light of the district court delay (.2)	.2	$1,945.00	$389.00
4/15/25	PT	Revise and finalize Midas claim objection (.3); coordinate filing of same with R. Harrington to do declaration to support preclusion (.2); follow up with R. Harrington regarding need to seal Midas claim objection (.3)	.8	$1,945.00	$1,556.00
4/15/25	BH	Work with attorneys to finalize the claim objection to the Midas Green proofs of claim (1.8); file the sealed claim objection and the unsealed claim objection (.6) and forward a copy of the sealed claim objection to the attorneys for Midas Green (.1)	2.5	$655.00	$1,637.50
4/15/25	RH	Draft and coordinate Brannen declaration (1.4); review and redact Midas claim objection (1.)	2.4	$1,165.00	$2,796.00
4/17/25	BH	Finalize (.6) and file the amended objection to the Midas Green claims (.3); finalize (.2) and file the Motion to Seal the Midas Green Claim Objection (.3); distribute file-stamped copies to the Client (.1)	1.5	$655.00	$982.50
5/8/25	PT	Review and analyze the Midas response to claim objection (.4) and	.6	$1,945.00	$1,167.00

DATE	QE	NARRATIVE	HOURS	HOURLY RATE	AMOUNT
		emails with E. Brannen regarding same (.2)			
5/28/25	PT	Review and respond to court inquiry regarding scheduling hearing on Midas Green claim objection with E. Brannen (.5); correspond with E. Brannen regarding logistics for claims objection hearing and potential for summary disposal (.2)	.7	$1,945.00	$1,361.50
5/30/25	PT	Conference call with Rachel Harrington, Elizabeth Brannen, Bridget Asay, John Stokes, Collen Smith to discuss strategy for Midas Green claim objection (.8); correspondence with R. Harrington regarding using dispositive motion on Midas Green and Proof claim objections and forward research (.4).	1.2	$1,945.00	$2,334.00
6/5/25	PT	Correspond with E. Brannen regarding Midas Green claim objection (.2)	.2	$1,945.00	$389.00
6/25/25	RH	Draft Midas Green reply (3.1)	3.1	$1,165.00	$3,611.50
6/26/25	RH	Call with co-counsel to discuss the Midas Green claim objection (.3)	.3	$1,165.00	$349.50
7/2/25	RH	Legal research into preclusion doctrines (3.5); call with K. Halpern to discuss claim objection (.5); draft Midas reply (5.8)	9.8	$1,165.00	$11,417.00
7/3/25	PT	Preparation for the hearing on the Midas Green claim objection (1.4)	1.4	$1,945.00	$2,723.00
7/3/25	RH	Draft the Midas reply (5.); identify and draft exhibit list (1.); incorporate revisions to reply (1.5); calls with E. Brannen to discuss reply (.3); draft proposed scheduling order (.6)	8.4	$1,165.00	$9,786.00
7/7/25	RH	Incorporate edits to the Midas Reply and proposed order (1.5); proof and finalize reply (.7); call with E. Brannen to discuss upcoming hearing (.3); legal research to distinguish opposition cases (1.5); create presentation for hearing (6.1).	10.1	$1,165.00	$11,766.50
7/8/25	BH	Prepare hearing notebooks and pleading notebooks for P. Tomasco	2.4	$655.00	$1,572.00

DATE	QE	NARRATIVE	HOURS	HOURLY RATE	AMOUNT
		and R. Harrington (1.1); attend part of the hearing by telephone (.8); finalize (.2) and file the proposed Scheduling Order for Contested Matter re Midas Claim Objection (.3).			
7/8/25	PT	Meeting with E. Brannen and R. Harrington regarding hearing presentation and hearing preparation (2.1); prepare for (.2) and participate in hearing on claim objection re Midas Green (1.); follow up review and revisions to proposed scheduling order (.4).	3.7	$1,945.00	$7,196.50
7/8/25	RH	Legal research into preclusion doctrines (1.1); revise presentation (1.); attend Midas hearing (1.); discuss strategy for Midas claim objection (1.5); draft revised proposed order (.5); legal research into Delaware statute of limitations (1.)	6.1	$1,165.00	$7,106.50
7/18/25	PT	Correspond with E. Brannen regarding retaining expert for Midas Green litigation (.1)	.1	$1,945.00	$194.50
7/24/25	PT	Review subpoena request from Midas Green and correspondence with E. Brannen and C. Topping regarding same and timing compared to hearing on summary judgment motion (.8)	.8	$1,945.00	$1,556.00
7/24/25	RH	Draft Midas Claim estimation motion	4.0	$1,165.00	$4,660.00
7/25/25	RH	Draft Midas estimation motion (5.5); review motion for summary judgment (.6)	6.1	$1,165.00	$7,106.50
7/28/25	PT	Review, revise and suggest additional revisions to motion for summary judgment (1.2); correspondence with E. Brannen regarding additional charges to motion for summary judgment against Midas Green (.7)	1.9	$1,945.00	$3,695.50
7/29/25	RH	Revise and incorporate comments to Midas estimation motion (3.1); draft proposed order (.5); finalize estimation motion (.5); draft motion	5.6	$1,165.00	$6,524.00

DATE	QE	NARRATIVE	HOURS	HOURLY RATE	AMOUNT
		to seal (.5); review and send edits to motion for summary judgment (1.)			
8/5/25	PT	Correspondence with E. Brannen regarding procedures for hearing (.1); review and revise proposed rule 11 letter to Midas Green and additional research regarding 1927 to include in letter (1.3)	1.4	$1,945.00	$2,723.00
8/6/25	PT	Correspond with E. Brannen regarding hearing preparation for Midas claim objection and witness logistics (.2)	.2	$1,945.00	$389.00
8/11/25	PT	Review and suggest response to amended Midas Green claims (.4); correspondence with chambers and E. Brannen regarding rescheduling hearing (.6)	1.0	$1,945.00	$1,945.00
8/12/25	RH	Draft notice of rescheduled hearing regarding Midas Claims	.4	$1,165.00	$466.00
8/12/25	PT	Coordinate reset hearing date with E. Brannen and chambers and correspondence regarding briefing schedule (.9); correspondence with E. Brannen regarding timing for sanctions motion (.2); review and suggest revisions to letter to Midas counsel (.3); coordinate hearing date notice (.1)	1.5	$1,945.00	$2,917.50
8/13/25	RH	Review Midas opposition papers (.5); legal research into related issues (4.4).	4.9	$1,165.00	$5,708.50
8/13/25	BH	Draft Notice of Rescheduled Hearing regarding Midas Green Technology's claims (.3) and file same (.3).	.6	$655.00	$393.00
8/15/25	RH	Legal Research in support of Reply to Midas estimation motion (5.8)	5.8	$1,165.00	$6,757.00
8/19/25	RH	Revisions to Midas estimation reply (4.8); proof reply (.5)	5.3	$1,165.00	$6,174.50
8/19/25	BH	Work with attorneys to finalize (4.1) and file the Reply in Support of Summary Judgment Motion in Support of Amended Omnibus Objection to Claims filed by Midas Green Technologies (.4); serve both J	4.8	$655.00	$3,144.00

DATE	QE	NARRATIVE	HOURS	HOURLY RATE	AMOUNT
		Thomas (.2); distribute same to the Client (.1)			
8/28/25	PT	Review and comment on filing by Midas Green	.3	$1,945.00	$583.50
8/4/25	PT	Review and comment on draft rule 11 letter to Midas Green (.3)	.3	$1,945.00	$583.50
Total			111.9		$137,059.50

EXHIBIT 1008

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)

MIDAS GREEN TECHNOLOGIES, LLC'S OBJECTIONS TO DEBTORS' DECLARATION OF CHARLES R. TOPPING IN SUPPORT OF DEBTORS' MOTION FOR SANCTIONS RELATING TO CLAIMS FILED BY MIDAS GREEN TECHNOLOGIES LLC (ECF No. 1641)

Midas Green Technologies, Inc. ("Midas") hereby objects to Debtor's Declaration of Charles R. Topping in Support of Debtors' Motion for Sanctions relating to Claims filed by Midas Green Technologies.

INTRODUCTION

Debtor's Motion for Sanctions under Federal Rule of Bankruptcy Procedure 9011 is procedurally defective and substantively without merit. The Motion improperly seeks to recover attorneys' fees and expenses far beyond the scope of Rule 9011, fails to comply with the mandatory safe-harbor protections, and rests on filings that were objectively reasonable and made in good faith.

Moreover, Debtors' evidentiary submission — a declaration attaching over 570 pages of invoices — highlights the impropriety of their request. The invoices do not parse out which fees, if any, were "directly resulting from" the alleged sanctionable conduct. Instead, Debtors indiscriminately included billing entries for unrelated matters, block-billed time, storage charges, and even invoices billed to entirely different matters. These defects confirm that the Motion is not a good-faith attempt to recover narrowly tailored expenses, but rather an effort to shift all of Debtors' litigation costs onto Midas for filing claims against them.

For these reasons, the Motion should be denied in its entirety.

LEGAL STANDARD

Rule 9011, like Rule 11 of the Federal Rules of Civil Procedure, permits sanctions only when filings are presented for an improper purpose or

without a reasonable basis in fact or law. Sanctions are deterrent, not compensatory, and any monetary award must be limited to "the reasonable attorney's fees and other expenses directly resulting from the violation." Fed. R. Bankr. P. 9011(c)(2). The Fifth Circuit requires courts to apply this standard narrowly and only in clear cases of abuse. *Thomas v. Capital Sec. Servs., Inc.,* 836 F.2d 866, 878 (5th Cir. 1988) (en banc).

OBJECTIONS TO EVIDENCE OF FEES AND EXPENSES

A. Sanctions Are Limited to Deterrence, Not Fee Shifting

The Motion improperly seeks broad recovery of attorneys' fees and costs, contrary to Rule 9011's deterrent purpose. Courts in this Circuit prohibit using sanctions as a vehicle for wholesale fee shifting. *Childs v. State Farm Mut. Auto. Ins. Co.,* 29 F.3d 1018, 1024 (5th Cir. 1994).

Midas objects to the purported evidentiary submissions offered in support of Debtors' claim that Rhodium paid not less than $2,500,000 in fees to Kirkland & Ellis with $81,778.87 in costs, and an additional $2,596,065.00 in fees to Stris & Maher LLP ("Stris") with $320,376.00 in costs.

Debtors' claimed payment of not less than $2,500,000 in attorneys' fees to Kirkland & Ellis and $81,778.87 in costs is not recoverable as a sanctionable "expense" under Rule 9011. Rule 9011 is limited to deterrence and authorizes only those sanctions that are "sufficient to deter repetition of such conduct or

comparable conduct by others similarly situated." Attorneys' fees and expenses may only be awarded to the extent they were directly and reasonably incurred as a result of the specific sanctionable conduct at issue. The Kirkland & Ellis fees represent work performed in unrelated patent litigation and not in connection with the alleged Rule 9011 violation before this Court. Likewise, the claimed $81,778.87 in "costs" are not shown to be caused by, or necessary to address, the conduct giving rise to the motion. Because these amounts are unrelated, excessive, and outside the scope of Rule 9011, they cannot be shifted to Midas as a sanction and should be disallowed in their entirety.

No competent evidence has been presented to establish that these expenses were actually incurred, let alone that they were directly and reasonably caused by the specific conduct at issue under Rule 9011. Debtors have failed to submit invoices, billing records, payment records, or other admissible documentation substantiating these amounts.

Rule 9011 sanctions must be limited to expenses "directly resulting from" the sanctionable conduct, not generalized or unrelated litigation expenditures. (See *In re DeVille*, 361 F.3d 539, 548–49 (9th Cir. 2004).) The Kirkland & Ellis fees and costs relate to prior patent litigation and not this proceeding. Likewise, there are no documents in the record supporting the alleged Stris fees or costs prior to November 24, nor showing any causal nexus

to the alleged sanctionable conduct.

Because Debtors have not carried their evidentiary burden, these claimed amounts are speculative, irrelevant, and inadmissible, and should be disregarded in ruling on the motion for sanctions.

B. Debtors' Fee Submission Is Grossly Overbroad and Defective

Even if sanctions were theoretically available (they are not), Debtors' evidentiary submission is fatally flawed:

Overinclusive Billing: Debtors submitted a declaration attaching 570 pages of invoices without parsing which entries relate to the alleged sanctionable conduct.

i. Inclusion of Unrelated Matters: The invoices sweep in work on unrelated matters, including disputes involving for example, Midas and GRC, Ameritex, etc., which bear no connection to the alleged conduct before this Court.

ii. Block Billing: Debtors openly admit to block billing, combining sanction-related tasks with wholly unrelated work, making it impossible to separate recoverable from non-recoverable fees.

iii. Improper "Storage Fees": Debtors seek recovery for monthly discovery hosting charges, yet these expenses are not "directly resulting from" any sanctionable conduct and, by their own

admission, continue even though the so-called district court litigation has concluded.

iv. Undocumented Expert Fees: Debtors included thousands of dollars in expert consultant charges without providing a single detailed invoice explaining the nature of the work performed. These entries cannot be verified and are not recoverable.

v. Misallocated Billing: Debtors further misrepresent their records by attributing $55,720 as billed to the Midas patent case, when Exhibit H clearly shows the charges were billed to Whinstone, which is a fully unrelated lease dispute between the Debtors and their landlord.

These defects reveal that Debtors simply "threw everything under the sun" into their fee request in hopes of recovering their entire bankruptcy litigation costs under the guise of sanctions. Rule 9011 does not permit such sweeping recovery.

C. Debtors' Evidence Fails to Meet Their Burden of Proof

Under Bankruptcy Rule 9013, the Debtors' bear the burden of supporting their motion with admissible evidence establishing entitlement to relief. See *In re Terrell,* 410 F. App'x 754, 756 (5th Cir. 2011) (sanctions require specific factual findings supported by evidence). The declaration and invoices Debtors

submitted do not satisfy this burden:

i. They fail to segregate recoverable fees from non-recoverable litigation expenses.

ii. They rely on conclusory statements without identifying which fees are tied to the alleged sanctionable conduct.

iii. They omit critical supporting documentation, such as detailed invoices for expert consultant charges.

iv. Without competent evidence demonstrating that specific, identifiable fees were "directly resulting from" sanctionable conduct, Debtors cannot carry their evidentiary burden. The Court is left with only speculation, which cannot support an award of sanctions.

CONCLUSION

For the foregoing reasons, Midas respectfully requests that the Court deny Debtors' Motion for Sanctions in its entirety and grant such other and further relief as the Court deems just and proper.

DATED: September 19, 2025

Respectfully submitted,
/s/ Joseph E. Thomas

Joseph E. Thomas (*admitted p.h.v.*)
William J. Kolegraff (*admitted p.h.v.*)
Grant J. Thomas (*admitted p.h.v.*)

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Marshall, TX 75670
(903) 938-8900

Attorneys for Plaintiff Midas Green Technologies, LLC

CERTIFICATE OF SERVICE

I, Tierra Mendiola, hereby certify that on September 19, 2025, a copy of the foregoing was served by email from tmendiola@twtlaw.com to Counsel to the Debtors and Debtors-In-Possession via email to pattytomasco@quinnemanuel.com; cameronkelly@quinnemanuel.com; alainjaquet@quinnemanuel.com; rachelharrington@quinnemanuel.com and mailed to 700 Louisiana Street, Suite 3900, Houston, Texas 77002.

/s/ Tierra Mendiola

EXHIBIT 1009

Docket #2428 Date Filed: 06/24/2026

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)

DECLARATION OF JORDAN PIETZSCH IN SUPPORT OF REQUEST OF WIND DOWN DEBTOR TO GRANT SANCTIONS MOTIONS AGAINST MIDAS GREEN

1. I, Jordan Pietzsch, submit this Declaration in support of the *Request of the Wind Down Debtor to Grant Sanctions Motions Against Midas Green* [Docket No. 2366] (the "**Sanctions Request**")[2] and as a supplement to the Topping Declaration in support of the Sanctions Motions.

2. I am a Managing Director at GXD Labs, LLC, Plan Administrator of the Wind Down Debtor. I submit this declaration upon my own personal knowledge and belief, and based upon documents and information available to me through my work on behalf of the Plan Administrator.

3. As identified in the Topping Declaration, certain Debtor entities incurred at least $5,498,220.00 in attorneys' fees and expenses litigating Midas Green's patent infringement claims in the Pre-Petition Action. *See* Topping Declaration at ¶¶ 2-3.

[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] All terms not defined in the Declaration have the meaning given to them in the Sanctions Request.

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4. As identified in the Topping Declaration, the Debtors incurred no less than $755,988.72 in attorneys' fees and expenses in the Chapter 11 Cases from the Petition Date through September 12, 2025, objecting to the Midas Claims. *See* Topping Declaration at ¶¶ 4-5.

5. Based on my review of fee applications and other information, from September 13, 2025, until the January 14, 2026 Effective Date, the Debtors incurred at least an additional approximately $480,000.00 in attorneys' fees and expenses relating to the Midas Claims. *See* Quinn Emanuel Urquhart & Sullivan, LLP's Fifth and Final Application for Payment of Compensation and Reimbursement of Expenses for the Period September 1, 2025, through January 14, 2026 [Docket No. 2324]; *see also* Stris and Maher LLP's Fifth and Final Application for Payment of Compensation and Reimbursement of Expenses for the Period August 26, 2024, through January 31, 2026 [Docket No. 2294].

6. Since the Effective Date and through May 31, 2026, the Wind Down Debtor has incurred approximately $90,000 in attorneys' fees and expenses relating to the Appeal and the Sanctions Request.

7. The Plan Administrator estimates that the Wind Down Debtor will incur approximately $50,000 in attorneys' fees and expenses on and after June 1, 2026 in preparation for the hearing on the Sanctions Request and Sanctions Motions scheduled for June 30, 2026. True and correct copies of invoices, redacted for privilege, evidencing attorneys' fees and expenses incurred relating to the Appeal and Sanctions Request since the Effective Date, including actual amounts incurred since June 1, 2026, which may be different than the estimate supplied above, will be made as and when available and at the Court's request.

8. As reflected above and in the exhibits to the Topping Declaration, and without taking into account any supplementation that may be permitted, the Debtors and the Wind Down

Debtor have incurred, or are anticipated to incur, not less than $5,498,220.00 in attorneys' fees and expenses prior to the Petition Date and $1,375,988.72 in attorneys' fees and expenses after the Petition Date, for a total of $6,874,208.72 in attorneys' fees and expenses in connection with the Midas Claims and Sanctions Request in the Pre-Petition Action and these Chapter 11 Cases.

9. I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, information, and belief:

Dated: June 24, 2026

/s/ Jordan Pietzsch
Jordan Pietzsch