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)

THIRD STIPULATION BETWEEN THE WIND DOWN DEBTOR AND QUINN EMANUEL URQUHART & SULLIVAN, LLP

[Relates to Dkt. Nos. 264, 2324, 2354, and 2414]

The Wind Down Debtor[2] and Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn Emanuel," and with the Wind Down Debtor, the "Parties"), by and through their undersigned counsel, hereby stipulate and agree as set for below in this stipulation (the "Stipulation").

RECITALS

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

[1] The Debtors in these chapter 11 cases and the last four digits of their corporate identification numbers are as follows: Rhodium Encore LLC (3974), Jordan HPC LLC (3683), Rhodium JV LLC (5323), Rhodium 2.0 LLC (1013), Rhodium 10MW LLC (4142), Rhodium 30MW LLC (0263), Rhodium Enterprises, Inc. (6290), Rhodium Technologies LLC (3973), Rhodium Renewables LLC (0748), Air HPC LLC (0387), Rhodium Shared Services LLC (5868), Rhodium Ready Ventures LLC (8618), Rhodium Industries LLC (4771), Rhodium Encore Sub LLC (1064), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), and Rhodium Renewables Sub LLC (9511) (collectively, the "Debtors").

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

2. On February 27, 2026, Quinn Emanuel filed its *Fifth and Final Application for Payment of Compensation and Reimbursement of Expenses* [Dkt. No. 2324] seeking allowance and approval of certain compensation to Quinn Emanuel on an interim and final basis, and reimbursement of certain expenses (the "Application"). Utilizing the Court's negative notice procedures, the Application sets the deadline for any party to object or otherwise respond to the Application as Friday, March 20, 2026 – the 21st day after Quinn Emanuel's filing of the Application (the "Original Response Deadline").

3. On March 18, 2026, the Parties filed the Stipulation Between the Wind Down Debtor and Quinn Emanuel Urquhart & Sullivan, LLP [Dkt. No. 2354] (the "First Stipulation"), stipulating to an extension for the Wind Down Debtor to file an objection or other response to the Application to Thursday, June 18, 2026.

4. On June 14, 2026, the Parties filed the Second Stipulation Between the Wind Down Debtor and Quinn Emanuel Urquhart & Sullivan, LLP [Dkt. No. 2414] (the "Second Stipulation"), stipulating to an extension for the Wind Down Debtor to file an objection or other response to the Application to Thursday, July 2, 2026 (the "Extended Response Deadline")

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

1. Notwithstanding the Extended Response Deadline or any other contrary response deadline, the Parties agree that the Wind Down Debtor may file an objection or any other response to the Application on or before **Monday, August 3, 2026.**

STIPULATED AND AGREED:

/s/ Chase J. Potter
IACUONE McALLISTER POTTER PLLC
Chase J. Potter
Texas Bar No. 24088245
Joshua J. Iacuone
Texas Bar No. 24036818
Joshua L. Shepherd
Texas Bar No. 24058104
4925 Greenville Ave., Suite 1112
Dallas, Texas 75206
Telephone: (214) 432-1536
Email: potter@imcplaw.com
Email: josh@imcplaw.com
Email: shepherd@imcplaw.com

Counsel for the Wind Down Debtor

/s/ Patricia B. Tomasco (w/permission)
QUINN EMANUEL URQUHART & SULLIVAN, LLP
Patricia B. Tomasco
Texas Bar No. 01797600
Cameron Kelly
Texas Bar No. 24120936
Alain Jaquet (*pro hac vice)*
Rachel Harrington (*pro hac vice)*
700 Louisiana Street, Suite 3900
Houston, Texas 77002
Telephone: (713) 221-7000
Email: pattytomasco@quinnemanuel.com
Email: cameronkelly@quinnemanuel.com
Email: alainjaquet@quinnemanuel.com
Email: rachelharrington@quinnemanuel.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on July 1, 2026, a true and correct copy of this document was electronically served via the Court's CM/ECF system on all parties entitled to such notice.

/s/ Chase J. Potter
CHASE J. POTTER