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)

THE WIND DOWN DEBTOR'S AMENDED WITNESS AND EXHIBIT LIST FOR THE HEARING SCHEDULED FOR JULY 2, 2026, AT 2:00 P.M. (Prevailing Central Time)

Case No. 24-90448 (ARP)	Name of Debtor: Rhodium Encore LLC, et al.
Adversary No:	Style of Adversary:
Witnesses: 1. Jordan Pietzsch 2. Any witness called or designated by any other party; and 3. Any rebuttal witnesses as necessary[2] The Wind Down Debtor reserves the right to cross-examine any witness called by any other party.	
	Judge: Honorable Alfredo R. Pérez
	Hearing Date: July 2, 2026
	Hearing Time: 2:00 P.M. CT
	Party's Name: Rhodium Enterprises Inc., the Wind Down Debtor ("**Wind Down Debtor**")
	Attorney's Name: Sarah Link Schultz
	Attorney's Phone: 214-969-4367

[1] Debtors in these chapter 11 cases and the last four digits of their corporate identification numbers are as follows: Rhodium Encore LLC (3974), Jordan HPC LLC (3683), Rhodium JV LLC (5323), Rhodium 2.0 LLC (1013), Rhodium 10MW LLC (4142), Rhodium 30MW LLC (0263), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), Rhodium Encore Sub LLC (1064), Rhodium Enterprises, Inc. (6290), Rhodium Industries LLC (4771), Rhodium Ready Ventures LLC (8618), Rhodium Renewables LLC (0748), Air HPC LLC (0387), Rhodium Renewables Sub LLC (9511), Rhodium Shared Services LLC (5868), and Rhodium Technologies LLC (3973). The mailing and service address of Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.

[2] The Wind Down Debtor is removing Ashley Jonson as a witness from this Amended Witness and Exhibit List.

	Nature of Proceeding: Debtors' Motion for Sanctions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC [Docket No. 1793]; Debtors' Motion for Sanctions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC Pursuant to 11 U.S. Code § 105 and 35 U.S. Code § 285 [Docket No. 1794]; Request of the Wind Down Debtor to End Abatement of, and Grant, Sanctions Motions Against Midas Green [Docket No. 2366].

EXHIBIT LIST

Ex. #	Description	Offered	Objection	Admitted / Not Admitted	Disposition
1.	April 9, 2024 Hearing Transcript [Docket No. 1659-13]				
2.	Midas Green Technologies LLC's Proofs of Claim 004, 062, and 068-072				
3.	Debtors' Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 – FILED UNDER SEAL [Docket No. 954][3]				
4.	Motion to Estimate Contingent and Unliquidated Claims of Midas Green Technologies LLC and Grant Related Relief – FILED UNDER SEAL [Docket No. 1483]				
5.	Debtors' Summary Judgment Motion in Support of Amended Omnibus Objection to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC – FILED UNDER SEAL [Docket No. 1484]				
6.	Midas Green Technologies, LLC's Motion for Mandatory Withdrawal of Reference Pursuant to 28 U.S.C. § 157 and Rule 5011 of the Federal				

[3] Except with respect to Exhibit 46, Exhibits identified as FILED UNDER SEAL herein were filed as such at the applicable docket number listed in this Witness and Exhibit List.

EXHIBIT LIST

Ex. #	Description	Offered	Objection	Admitted / Not Admitted	Disposition
	Rules of Bankruptcy Procedure for Abstention [Docket No. 1579]				
7.	Debtors' Motion for Sanctions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC [Docket No. 1602]				
8.	Scheduling Order with Respect to the Debtors' Motion for Sanctions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC (ECF No. 1602) [Docket No. 1609]				
9.	Declaration re: 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) [Docket No. 1641]				
10.	Debtors' Opposition to Midas Green Technologies, LLC's Motion for Mandatory Withdrawal of Reference Pursuant to 28 U.S.C. § 157 and Rule 5011 of the Federal Rules of Bankruptcy Procedure for Abstention [Docket No. 1655]				
11.	Jan 30, 2025, Email from Clerk Corey Brown to Counsel [Docket No. 1659-25]				
12.	February 7, 2025 Joint Proposed Rulings [Docket No. 1659-26]				
13.	August 2023 Email from Elizabeth Brannen to Counsel for Midas Green Technologies, LLC [Docket No. 1659-29]				
14.	Midas Green Technologies, LLC's Opposition to Debtors' Motion for Sanctions Relating to Claim Numbers				

EXHIBIT LIST

Ex. #	Description	Offered	Objection	Admitted / Not Admitted	Disposition
	004, 062, and 068-072 Filed by Midas Green Technologies LLC (ECF No. 1602) [Docket No. 1662]				
15.	Transcript re: Held on September 24, 2025 Before Judge Alfredo R. Perez [Docket No. 1719]				
16.	Debtors' Motion for Sanctions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC [Docket No. 1793]				
17.	Debtors' Motion for Sanctions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC Pursuant to 11 U.S. Code § 105 and 35 U.S. Code § 285 [Docket No. 1794]				
18.	Transcript re: Motion and Status Held on September 23, 2025 Before Judge Alfredo R. Perez [Docket No. 1806]				
19.	Memorandum Opinion and Order on Debtors' Amended Omnibus Objection to Claim Numbers 004, 062, and 068–072 (ECF No. 953) and Debtors' Motion to Estimate (ECF No. 1485) [Docket No. 1878]				
20.	Report and Recommendation to the District Court Regarding Midas Green Technologies, LLC's Motion to Withdraw the Reference [Docket No. 1880]				
21.	Midas Green Technologies, LLC's Opposition to Debtors' Motion for Sanctions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC [Docket No. 1962]				
22.	Midas Green Technologies, LLC's Opposition to Debtors' Motion for Sanctions Relating to Claim Numbers				

EXHIBIT LIST

Ex. #	Description	Offered	Objection	Admitted / Not Admitted	Disposition
	004, 062, and 068-072 Filed by Midas Green Technologies LLC Pursuant to 11 U.S. Code § 105 and 35 U.S. Code § 285 [Docket No. 1963]				
23.	Midas Green Technologies, LLC's Notice of Appeal [Docket No. 1983]				
24.	Order Abating Motions for Sanctions [Docket No. 1986]				
25.	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]				
26.	Order Granting Midas Green Technologies, LLC's Motion to Voluntarily Dismiss Appeal [Docket No. 2312]				
27.	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]				
28.	Request of the Wind Down Debtor to End Abatement of, and Grant, Sanctions Motions Against Midas Green [Docket No. 2366]				
29.	Midas Green Technologies, LLC's Objections to Request of the Wind Down Debtor to End Abatement of, and Grant, Sanctions Motions Against Midas Green [Docket No. 2372]				
30.	Notice of Filing of Decision Under Seal – FILED UNDER SEAL [Docket No. 2385]				
31.	Midas Green Technologies, LLC's Request to Deny or Defer the Debtors' Request for Attorney's Fees				

EXHIBIT LIST

Ex. #	Description	Offered	Objection	Admitted / Not Admitted	Disposition
	Under 35 U.S.C. § 285, to Limit Any Sanctions to Fees Incurred in These Cases, and, in the Alternative, to Withdraw the Reference of the § 285 Issue [Docket No. 2397]				
32.	Notice of Filing May 18, 2026 Hearing Transcript [Docket No. 2400][4]				
33.	Midas Green Technologies, LLC's Opposition to Debtors' Motion for Sanctions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC Pursuant to 11 U.S. Code § 105 and 35 U.S. Code § 285 [Docket No. 2421]				
34.	Midas Green Technologies, LLC's Opposition to Debtors' Motion for Sanctions Relating to Claim Numbers 004, 062, and 068-072 Filed by Midas Green Technologies LLC [Docket No. 2422]				
35.	The Wind Down Debtor's Response to Midas Green's Request to Deny or Defer Attorney's Fees Under 35 U.S.C. § 285 and Reply in Further Support of its Request to Grant Second Sanctions Motions Against Midas Green [Docket No. 2427]				
36.	Declaration of Jordan Pietzsch in Support of Request of Wind Down Debtor to Grant Sanctions Motions Against Midas Green [Docket No. 2428]				
37.	Midas Green Technologies LLC's Reply in Support of its Section 285 Objection and Its Oppositions to				

[4] The Court has restricted access to the May 18, 2026 hearing transcript until September 8, 2026. As such, the Wind Down Debtor has filed it under seal.

EXHIBIT LIST

Ex. #	Description	Offered	Objection	Admitted / Not Admitted	Disposition
	Debtors' Motions for Sanctions (ECF 2397) [Docket No. 2430]				
38.	Intentionally Omitted				
39.	Intentionally Omitted				
40.	Intentionally Omitted				
41.	Chart Regarding Fees and Expenses the Debtors Incurred From September 12, 2025 Until January 14, 2026 Relating to the Midas Claims				
42.	February 2026 Invoice for Akin Gump Strauss Hauer & Feld LLP (redacted)				
43.	March 2026 Invoice for Akin Gump Strauss Hauer & Feld LLP (redacted)				
44.	April 2026 Invoice for Akin Gump Strauss Hauer & Feld LLP (redacted)				
45.	May 2026 Invoice for Akin Gump Strauss Hauer & Feld LLP (redacted)				
46.	Stris & Maher LLP's Engagement Letter and Invoices Paid from May 2023 through July 2024 – FILED UNDER SEAL				
47.	Intentionally Omitted				
48.	Intentionally Omitted				
49.	Intentionally Omitted				
50.	**Certification of Alex Peloubet in Support of Request of Wind Down Debtor to Grant Sanctions Motions Against Midas Green**[5]				
51.	Any document or pleading filed in the above-captioned proceedings				
52.	Any exhibit designated by any other party				
53.	Any exhibit necessary to rebut the evidence or testimony of any witness				

[5] At ECF Nos. 2433 and 2444, the Wind Down Debtor filed Exhibits 1-46. The Wind Down Debtor is adding, to this Amended Witness and Exhibit List, Exhibit 50 (as indicated in bold lettering).

EXHIBIT LIST

Ex. #	Description	Offered	Objection	Admitted / Not Admitted	Disposition
	offered or designated by any other party				

RESERVATION OF RIGHTS

The Wind Down Debtor reserves all rights, including, but not limited to, the right to amend, revise, or supplement this Witness and Exhibit List at any time, to designate additional witnesses and exhibits, and to call any person identified as a witness by any other party in interest or introduce any document identified as an exhibit by any other party in interest for any permissible purpose under the Federal Rules of Bankruptcy Procedure and the Federal Rules of Evidence.

Dated: July 2, 2026

Respectfully Submitted,

AKIN GUMP STRAUSS HAUER & FELD LLP

/s/ Sarah Link Schultz

Sarah Link Schultz (State Bar No. 24033047; S.D. Tex. 30555)
Elizabeth Scott (State Bar No. 24059699; S.D. Tex. 2255287)
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-and-

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Counsel to the Wind Down Debtor

CERTIFICATE OF SERVICE

I certify that on July 2, 2026, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Sarah Link Schultz
Sarah Link Schultz

EXHIBIT 50

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)

CERTIFICATION OF ALEX PELOUBET IN SUPPORT OF REQUEST OF WIND DOWN DEBTOR TO GRANT SANCTIONS MOTIONS AGAINST MIDAS GREEN

I, Alex Peloubet, hereby declare as follows:

1. I make this certification in connection with the Wind Down Debtor's *Response to Midas Green's Request to Deny or Defer Attorney's Fees under 35 U.S.C. § 285 and Reply in Further Support of its Request to Grant Second Sanctions Motions Against Midas Green* [Docket No. 2427] ("**Reply**").[2]

2. I worked in the Debtors' finance department beginning in September 2021, and continuing through the Debtors' emergence from bankruptcy on January 14, 2026. I first was employed by the Debtors as Director of Finance, and later as Vice President of Finance and Accounting. In those capacities, I became generally familiar with the Debtors' practices with respect to the payment of outside legal counsel, and the review, payment and maintenance of

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[2] Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Reply.

records of outside counsel invoices. I make this declaration based on my own personal knowledge, and based on records available to me in connection with my role at the Debtors.

3. I have reviewed Exhibit 46 to *The Wind Down Debtors' Amended Witness and Exhibit List for the Hearing Scheduled for July 2, 2026, at 2:00 p.m. (Prevailing Central Time)* [Docket No. 2444-06]. Exhibit 46 comprises true and correct redacted copies of (i) an engagement agreement between certain Debtor entities and Stris & Maher ("Stris") dated March 31, 2023 in connection with certain patent infringement claims made by Midas Green (the "Engagement Agreement"), a rider to the Engagement Agreement dated April 10, 2024 ("Rider"), and invoices provided on an approximately monthly basis to the Debtors for payment by Stris ("Invoices").

4. I certify that the records comprising Exhibit 46 were maintained by the Debtors in the course of their regularly conducted business activity, and were relied on by the Debtors in connection with identifying amounts to be paid to Stris for its work in respect of Midas Green.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 2, 2026.



Alex Peloubet