Docket #2480 Date Filed: 10/01/2026
United States Bankruptcy Court
Southern District of Texas
ENTERED
October 01, 2026
Nathan Ochsner, Clerk

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

In re:	§	Chapter 11
	§	
RHODIUM ENTERPRISES, INC.	§	Case No. 24-90454 (ARP)
	§	
Wind Down Debtor.	§	

SEVENTH STIPULATION AND AGREED ORDER BETWEEN THE WIND DOWN DEBTOR AND TEMPLE GREEN DATA, LLC

[Relates to Dkt. Nos. 2197, 2247, 2298, 2331, 2346, 2379, 2411, 2452[1] and 22]

The Wind Down Debtor and Temple Green Data, LLC ("Temple Green", and with the Wind Down Debtor, the "Parties"), by and through their undersigned counsel, hereby stipulate and agree as set forth below in this stipulation (the "Stipulation").

RECITALS

1. On August 24, 2024, and August 29, 2024 (collectively, the "Petition Date"), the Debtors in these cases filed voluntary Chapter 11 petitions, thereby initiating these cases.

2. Pursuant to 11 U.S.C. § 108(a), any potential nonexpired limitations period for causes of action that the Debtors could commence under nonbankruptcy law is extended until the later of the period established under nonbankruptcy law or two years after the order for relief was entered in these cases. As a result, the extended statute of limitations for such causes of action could have expired as early as August 24, 2026.

3. On November 24, 2025, Temple Green filed its Proof of Claim No. 273 (the "Proof

[1] Prior stipulations between the Wind Down Debtor and Temple Green Data, LLC were filed into related case number 24-90448 (ARP). Per the Court's Final Decree and Order issued on July 11, 2026, all future filings are being made under the Remaining Case, 24-90454 (ARP).

of Claim") in the Rhodium Encore LLC bankruptcy case.

4. On December 24, 2025, this Court entered its *Order (I) Setting Bar Date for Filing Proofs of Administrative Expense Claims and (II) Approving Notice of the Administrative Expense Claims Bare Date and the Plan Effective Date, and (III) Granting Related Relief* [Dkt. No. 2197] (the "Administrative Claims Order"). The Administrative Claims Order states that (i) the deadline for any entity to file a Proof of Administrative Claim is 5:00 p.m. (prevailing Central Time) on the 30th day following the Effective Date of the Plan; and (ii) objections to such Proof of Administrative Claim, if any, must be filed and served (as more clearly mandated within the Administrative Claims Order) no later than 60 days after the Effective Date.

5. On January 14, 2026, the Debtors and the Ad Hoc Group of SAFE Parties filed the *Notice of (I) Effective Date of Debtors' Second Amended Joint Chapter 11 Plan of Reorganization and (II) Bar Dates for Certain Claims* (the "Notice of Effective Date"). The Notice of Effective Date provides that the Debtors' Plan[2] became effective on January 14, 2026 (the "Effective Date").

6. As a result of the Effective Date, and pursuant to the Administrative Claims Order, the deadline for any entity to file a Proof of Administrative Claim was February 13, 2026, at 5:00 p.m. (prevailing central time). In turn, objections to such Proof of Administrative Claim, if any, were to be filed and served, pursuant to the Administrative Claims Order, no later than Monday, March 16, 2026.[3]

7. On February 12, 2026, Temple Green filed its *Temple Green Data, LLC's Application for Administrative Expense Claim* [Dkt. No. 2298] seeking an administrative expense

---

[2] *Second Amended Joint Chapter 11 Plan of Liquidation for Rhodium Encore LLC and its Affiliated Debtors Pursuant to Chapter 11 of the Bankruptcy Code* [Dkt. No. 2062] (the "Plan").

[3] The 60th day following the Effective Date fell on Sunday, March 15, 2026. Accordingly, and pursuant to Rule 9006(a)(1)(C) of the Federal Rule of Bankruptcy Procedure, the Objection Deadline then fell on the next day business day: Monday, March 16, 2026.

claim in an amount not less than $2,685,187.33 (the "Application").

8. On March 4, 2026, the Parties filed their *Stipulation Between the Wind Down Debtor and Temple Green Data, LLC* [Dkt. No. 2331] (the "First Stipulation") stipulating to Monday, March 16, 2026 as the deadline to file an objection or any other response to the Application.

9. On March 12, 2026, the Parties filed their *Second Stipulation Between the Wind Down Debtor and Temple Green Data, LLC* [Dkt. No. 2346] (the "Second Stipulation") stipulating to Friday, May 15, 2026 as the deadline to file an objection or any other response to the Application.

10. On May 12, 2026, the Parties filed their *Third Stipulation Between the Wind Down Debtor and Temple Green Data, LLC* [Dkt. No. 2379] (the "Third Stipulation") stipulating to Monday, June 15, 2026 as the deadline to file an objection or any other response to the Application.

11. On June 12, 2026, the Parties filed their *Fourth Stipulation Between the Wind Down Debtor and Temple Green Data, LLC* [Dkt. No. 2411] (the "Fourth Stipulation") stipulating to Wednesday, July 15, 2026 as the deadline to file an objection or any other response to the Application.

12. On June 30, 2026, the Wind Down Debtor filed its *Notice of Extension of Claim/Interest Objection Deadline* [Dkt. No. 2440], providing notice that the objection deadline to proofs of claim and interests was extended to Monday, October 12, 2026.

13. On July 2, 2026, the Parties filed their *Fifth Stipulation Between the Wind Down Debtor and Temple Green Data, LLC* [Dkt. No. 2452] (the "Fifth Stipulation") stipulating to Monday, August 17, 2026 as the deadline to file an objection or any other response to the Application.

14. On August 17, 2026, the Parties filed their *Sixth Stipulation and Agreed Order Between the Wind Down Debtor and Temple Green Data, LLC* [Dkt. No. 18] (the "Sixth Stipulation") stipulating to Monday, October 12, 2026 as the deadline to file an objection or any other response to the Application and the tolled deadline for the Wind Down Debtor to commence or continue an action or proceeding against Temple Green under applicable law. The Court entered the agreed order on the Sixth Stipulation on August 18, 2026 [Dkt. No. 22].

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

A. Notwithstanding any contrary response deadline contained within the Application, the First Stipulation, the Second Stipulation, the Third Stipulation, the Fourth Stipulation, the Fifth Stipulation, or the Sixth Stipulation, the Parties have agreed that the deadline to file an objection or any other response, including compulsory counterclaims if applicable, to the Application is extended to **Monday, November 30, 2026.**

B. Nothwithstanding any contrary requirement contained in the confirmed Plan or otherwise in these bankruptcy cases, the Parties have agreed that the deadline to file an objection or any other response to the Proof of Claim is extended to **Monday, November 30, 2026.**

C. If applicable law, an order in any proceeding or an agreement fixes a period for commencing or continuing an action or proceeding against Temple Green, and such period (including after giving effect to any prior tolling) did not expire prior to the date of the filing of the Petition Date, then such period does not expire with respect to such action or proceeding with respect to the Wind Down Debtor any other Person or party claiming under or through any Debtor or any of their Estates, until the later of (i) the end of such

period or (ii) **Monday, November 30, 2026**. The Parties agree that the applicable statute of limitations, including Texas Civil Practice & Remedies Code 16.003 and 16.004, on the potential causes of action that the Wind Down Debtor could assert against Temple Green pursuant to nonbankruptcy law is hereby tolled and extended to November 30, 2026, to the extent necessary for the potential assertion of causes of action that otherwise may expire on or before November 30, 2026. Those potential causes of action include, but are not limited to, gross negligence, breach of contract, fraudulent inducement, and fraud. To be clear, no such limitation period is shortened by this Stipulation. Temple Green agrees to waive any defense based on the assertion that any counterclaims or causes of action that could be asserted by the Wind Down Debtor is time-barred under any applicable limitations period, including, but not limited to, Texas Civil Practice & Remedies Code 16.003 and 16.004 in an action brought in these cases or another proceeding prior to or on Monday, November 30, 2026. All other defenses are expressly preserved.

SO ORDERED.

Signed: October 01, 2026

Alfredo R Pérez
United States Bankruptcy Judge

STIPULATED AND AGREED:
Dated: September 30, 2026

/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/ Victoria N. Argeroplos (w/ permission)
JACKSON WALKER LLP
Jennifer F. Wertz
Texas Bar No. 24072822
Victoria N. Argeroplos
Texas Bar No. 24105799
Beau H. Butler
Texas Bar No. 24132535
100 Congress Avenue, Suite 1100
Austin, TX 78701
(512) 236-2000- Telephone
Email: jwertz@jw.com
Email: vargeroplos@jw.com
Email: bbutler@jw.com

Counsel for Temple Green Data, LLC