Docket #0011 Date Filed: 07/28/2026

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.[1]	§	

STATEMENT OF THE WIND DOWN DEBTOR
CONCERNING THE MIDAS GREEN SANCTIONS MOTIONS

The Wind Down Debtor,[2] by and through its undersigned counsel, respectfully submits this statement (the "**Statement**") regarding several evidentiary and housekeeping matters in advance of the hearing scheduled for July 29, 2026, at 1:00 p.m. CST (the "**July 29 Hearing**") on the Debtors' motions for sanctions [Docket Nos. 1793 and 1794] ("**Sanctions Motions**")[3] against Midas Green.

STATEMENT

1. As an initial matter, Charles Topping, the Debtors' former General Counsel, is available to testify at the July 29 hearing. The Court may recall that Mr. Topping submitted a declaration at the Court's direction on September 12, 2025 [Docket No. 1641] (the "**Topping Declaration**"), detailing the fees that the Debtors incurred associated with the Midas Green litigation. The Wind Down Debtor sought to offer the Topping Declaration at the hearing in this

[1] The last four digits of the taxpayer identification number for Rhodium Enterprises, Inc. is 6290. The location of the Wind Down Debtor's service address for purposes of this chapter 11 case is 7301 SW 57th Ct, Suite 515, Miami, FL 33143.

[2] Capitalized terms used but not described herein shall have the meaning ascribed to them in *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].

[3] Unless otherwise indicated herein, all documents referenced herein were filed in *In re Rhodium Encore, LLC, et al.*, Case No. 24-90448 (ARP).

matter on June 30, 2026 (the "**June 30 Hearing**"). Midas Green objected on hearsay grounds because Mr. Topping was not available for examination at the June 30 Hearing, and the Wind Down Debtor argued his declaration nevertheless was admissible under the residual exception to the hearsay rule. *See* [Docket No. 2456], June 30 Tr. at 58-59 (transcript excerpts are attached hereto at **Tab A**). The Court indicated it would take the Wind Down Debtor's argument for admission under advisement. *See id.* at 62-63.[4] Fortunately, Mr. Topping will appear at the resumed July 29, 2026 Hearing, which obviates Midas Green's objection.[5]

2. The Wind Down Debtor submits that the hearing can be completed without lengthy witness testimony, from Mr. Topping or otherwise. Importantly, invoices from the professional firms Rhodium employed in its litigation with Midas Green are all before the Court, and available for review. During the June 30 Hearing in this matter, Midas Green complained that Mr. Topping did not attach copies of the pre-petition invoices for Kirkland & Ellis LLP ("**Kirkland**") and Stris & Maher LLP ("**Stris**") to his declaration when it was submitted last year. Notably, in the nearly twelve months since the Topping Declaration was submitted, Midas Green never sought discovery of any of those materials.

3. Nevertheless, after Midas Green raised its concerns at the June 30 Hearing, the Wind Down Debtor identified the materials sought by Midas Green, produced them, and added them to its witness and exhibit list. This exercise required considerable effort, including because neither Mr. Topping nor the Kirkland and Stris firms are employed by the Wind Down Debtor,

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[4] It appears that, despite having put Mr. Topping on its witness list, Midas Green made no effort of its own to arrange for Mr. Topping to testify on June 30, 2026. Contrary to Midas Green's claim during the June 30 Hearing, Midas Green never asked the Wind Down Debtor to make Mr. Topping available for the hearing. In any case, the Wind Down Debtor's ability to produce Mr. Topping, who is not an employee of the Wind Down Debtor, is, and was, limited at best. Mr. Topping is appearing at the July 29, 2026 Hearing in response to the Wind Down Debtor's trial subpoena.

[5] Midas Green has advised the Wind Down Debtor that it intends to cross-examine Mr. Topping during the July 29 Hearing.

and because the Wind Down Debtor's counsel was not involved in preparing the Topping Declaration in 2025.

4. The Wind Down Debtor sought to file the Stris pre-petition invoices with the Court on June 30, but because PACER was down, instead filed those materials on July 1, 2026. *See* [Docket No. 2444-6] (filed Stris invoices). The Kirkland pre-petition invoices took longer for the Wind Down Debtor to track down, and were filed with the Court on July 22, 2026. *See* [*In re Rhodium Enterprises, Inc.*, No. 24-90454, Docket No. 8-1] (filed Kirkland invoices).[6]

5. The Wind Down Debtor submits that these invoices are admissible for all purposes under the business records exception to the hearsay rule, and speak for themselves. *See* FRE 803(6); 902(11); *see also* [*In re Rhodium Enterprises, Inc.*, No. 24-90454, Plaintiff's Exhibit 56, filed at Docket No. 8-3] (Peloubet 902(11) business records certification of all pre-emergence invoices); [*In re Rhodium Enterprises, Inc.*, No. 24-90454, Plaintiff's Exhibit 55, filed at Docket No. 8-2] (Tomasco 902(11) certification of Quinn invoices); [*In re Rhodium Enterprises, Inc.*, No. 24-90454, Plaintiff's Exhibit 57, filed at Docket No. 8-4] (Brannen 902(11) certification of Stris invoices); *Montes v. Phelps Dodge Industries, Inc.*, 481 F. Supp. 2d 700, 709 (W.D. Tex. Sept. 27, 2006) (observing that business records elements may be established "by the testimony of the custodian or other qualified witness, ***or*** by certification that complies with Rule 902(11)," and

[6] The Wind Down Debtor also filed post-emergence Akin invoices through May 2026 on July 1, 2026. *See* [Plaintiff's Exhibits 42-45, Docket No. 2444-2, 2444-3, 2444-4, 2444-5]. All other invoices – those incurred post-petition and pre-emergence – were attached to fee applications and have been on the docket and available for review for months. For convenience, the Wind Down Debtor also identified certain of these documents as exhibits on June 26, 2026. *See* [Plaintiff's Exhibits 25 and 27]. Previously, Midas Green has suggested that witnesses and evidence not identified on the Wind Down Debtor's initial June 26, 2026 witness and exhibit list cannot be offered at any hearing in this case. The Wind Down Debtor submits, however, that Midas Green has misinterpreted the operative rules. Local Rule 9013-2(b) requires the parties to exchange exhibits and file witness and exhibit lists "by noon on the day of exchange in accordance with Table 1." *See* Bankr. S.D. Tex. R. 9013-2(b). The "day of exchange" is the day that is two business days before the hearing in question. Since July 29, 2026 is a Wednesday, pursuant to Table 1, the "day of exchange" is Monday, July 27, 2026. *See id.* 9013-2(m). All of the invoices (and other evidence and witnesses) were identified on or before July 22, 2026 (and in many cases, several weeks before the day of exchange), and therefore are compliant with the local rule.

admitting document based on certification) (emphasis added).[7] The residual exception to the hearsay rule provides an additional and independent basis for admission of the invoices. *See U.S. v. Laster*, 258 F.3d 525 (6th Cir. 2001) (admitting invoices under the residual exception where they were more probative on the point offered than any other available evidence, had indicia of trustworthiness, and where their admission would serve the interests of justice); *Scully v. Cashman Equipment Co.*, 2016 WL 4149961 (C.D. Cal. Aug. 2, 2016) ("[C]ourts have routinely found that commercial invoices and other similar documents are admissible under the business records exception.").

6. The Wind Down Debtor also submits that any continuing cross of Mr. Pietzsch, to the extent called for at all, can be brief. The Wind Down Debtor intends to withdraw paragraphs 3-5 and 8 of the Pietzsch Declaration. Paragraph 5 concerns fees incurred by the Debtors from the date of the Topping Declaration through emergence. The Stris applications identify all the work Stris performed related to Midas Green separately during that period (amounting to $275,324.10), but the Quinn applications do not. Accordingly, as Mr. Pietzsch explained during the July 2, 2026 hearing, he directed Akin to seek to identify in the Quinn invoice entries related to Midas Green, and sum the associated amounts. After the July 2 hearing, Akin discovered that it made an error in its review of the Quinn fee applications, and the calculation it supplied to Mr. Pietzsch for paragraph 5 of his declaration was mistaken. Instead of totaling $205,461.50, the Quinn entries associated with Midas Green during the relevant period total $167,914.75.

7. The Wind Down Debtor therefore will withdraw paragraph 5 of the Pietzsch

[7] The requisite business records foundation for professional fee invoices can be laid either by the professional services firm, or by the client. *See, e.g., MRT Constr. Inc. v. Hardrives, Inc.*, 158 F.3d 478, 483 (9th Cir. 1998) (approving admission of attorneys' fee invoices under FRE 803(6) based on business records foundation laid by the client); *see also Pizza Hut, LLC v. Ronak Foods, LLC*, 2022 WL 3544403 (E.D. Tex. 2022) (admitting report prepared by auditor as business record based on 803(6) foundation laid by client).

Declaration, and rely solely on the invoices themselves as evidence of amounts incurred by Quinn during the relevant period. For ease of reference, attached hereto as **Tab B** is a copy of the relevant Quinn invoices for the period beginning September 1, 2025 through emergence with the entries highlighted in yellow that the Wind Down Debtor submits self-evidently are related to Midas Green. Paragraphs 3, 4 and 8 will be withdrawn in favor of the Topping Declaration, assuming it is admitted.

8. Substantively, that leaves only paragraphs 6 and 7 of the Pietzsch Declaration, which concern Akin fees post-emergence. Akin invoices for the period are identified as Exhibits 42-45, and are redacted for relevance and privilege. Because Akin does not bill on a post-emergence basis by task, the time ascribed to each entry represents an estimate by Akin supplied to Mr. Pietzsch for purposes of preparing his declaration. Attached as **Tab C** is a copy of the document provided by Akin to Mr. Pietzsch estimating the amounts associated with the Midas Green entries.

9. In summary, the Wind Down Debtor claims the fees and expenses identified below were incurred by the firms identified below, during the periods identified below, in connection with the Rhodium's litigation with Midas Green. Cites to the record supporting the identified amounts also are provided for ease of reference.

Period	Firm	Amount	Record Cite
Inception to Petition Date	Kirkland	No less than $2.5 million in fees and $81,778.87 in expenses	Topping Decl. ¶ 2; PX 54, 56
Inception to Petition Date	Stris	$2,596,065.00 in fees and $320,376.00 in expenses	Topping Decl. ¶ 3; PX 46, 56
Petition Date to Topping Declaration	Stris	$579,975.79 in fees and $6,103.43 in expenses	Topping Decl. ¶ 4; PX 25, 56, 57
Petition Date to Topping Declaration	Quinn	$170,941.50 in fees	Topping Decl. ¶ 4; PX 27, 55, 56

Topping Declaration to Emergence	Stris	$208,237.50 in fees and $67,086.60 in expenses	PX 25, 56, 57
Topping Declaration to Emergence	Quinn	$167,914.75 in fees	PX 27, 55, 56
Post-Emergence through May 2026	Akin	$90,029.70 in fees	PX 36, 43, 43, 44, 45

10. As illustrated above, the total fees and costs claimed by the Wind Down Debtor for all firms during the identified periods is $6,788,509.14, the total fees and costs claimed by the Wind Down Debtor for the post-petition period through emergence is $1,200,259.57, and the total damages claimed by the Wind Down Debtor for the post-petition period through May 2026 is $90,029.70.[8]

RESERVATION OF RIGHTS

11. This Statement is submitted without prejudice to, and with a full reservation of, the Wind Down Debtor's rights, claims, defenses and remedies, including on appeal, and including, without limitation, its rights to amend, modify or supplement this Statement.

[8] Redacted invoices for Akin in June and July can be made available at the Court's request.

Dated: July 28, 2026

Respectfully Submitted,

AKIN GUMP STRAUSS HAUER & FELD LLP

/s/ *Sarah Link Schultz*
Sarah Link Schultz (State Bar No. 24033047; S.D. Tex. 30555)
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- and -

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Telephone: (212) 872-1000
Email: mhurley@akingump.com

Counsel to the Wind Down Debtor

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2026, a true and correct copy of the foregoing document was 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

TAB A

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS (HOUSTON)

IN RE:	Case No. 24-90448
	Chapter 11
RHODIUM ENCORE LLC,	
	515 Rusk Street
	Houston, TX 77002
Debtor.	
	Tuesday, June 30, 2026
	9:01 a.m.

TRANSCRIPT OF MOTION FOR SANCTIONS FOR DEBTOR ATTORNEY MISCONDUCT UNDER RULE 9011 [1793]; MOTION FOR SANCTIONS FOR OTHER REASONS [1794]; REQUEST OF THE WIND DOWN DEBTOR TO END ABATEMENT OF, AND GRANT, SANCTIONS MOTIONS AGAINST MIDAS GREEN [2366]
BEFORE THE HONORABLE ALFREDO R. PEREZ
UNITED STATES BANKRUPTCY COURT JUDGE

TELEPHONIC APPEARANCES:

For the Wind Down Debtor:	Akin Gump Strauss Hauer & Feld By: SARAH A. SCHULTZ, ESQ. 2300 N. Field St. Suite 1800 Dallas, TX 75201 (214) 969-4367
	Akin Gump Strauss Hauer & Feld By: MITCHELL P. HURLEY, ESQ. One Bryant Park New York, NY 10036 (212) 872-1000
APPEARANCES CONTINUED.	
Audio Operator:	Garrett Cole, ERO
Transcription Company:	Access Transcripts, LLC 10110 Youngwood Lane Fishers, IN 46048 (855) 873-2223 www.accesstranscripts.com

Proceedings recorded by electronic sound recording, transcript produced by transcription service.

TELEPHONIC APPEARANCES (Continued):

For Midas Green Technologies, LLC:	Thomas Whitelaw & Kolegraff By: JOSEPH EDWARD THOMAS, ESQ. WILLIAM J. KOLEGRAFF, ESQ. 18101 Von Karman Ave. Suite 230 Irvine, CA 92612 (949) 679-6400

I N D E X
6/30/26

WITNESSES	DIRECT	CROSS	REDIRECT	RECROSS
FOR THE WIND-DOWN DEBTOR:				
Jordan Pietzsch	By Proffer	64	--	--

EXHIBITS	ADMITTED
ECF Number 2428	63

going to get a chance to cross-examine. What's the basis of your objection to proceed?

MR. THOMAS: Well, (indiscernible) object the Topping declaration, Your Honor. He's not even here to testify. If you go to the Topping declaration, which was previously filed, we're saying these are amounts that were charged by various law firms. And I think I have the numbers here.

Yeah, he has no -- there's no supporting data at all. No invoices, no nothing. For a curriculum analysis, $2.5 million in legal fees or $81,000 in costs. And the same thing with Stris & Mahers, almost $2.6 million in fees, 320,000 in costs. There's absolutely no invoices. There's no backup. There's nothing. There's a naked hearsay statement saying this.

Now, we know Stris & Mahers handled lots of other cases, lots of other legal matters, I should say, other than the Midas Green Technology case and billed for those. If that's reflected actually on the invoices that were submitted as exhibits to the Topping declaration. But there are no invoices. There's no backup for, I'm going to say, almost $6 million of fees and costs. And we object to the admission of that.

And if Mr. Pietzsch wants to testify about what's in his declaration, I guess we can let him do that. But I'm not going to let him bring in hearsay through hearsay. In other

words, he can't just say, talk about the Topping declaration. We don't even have a witness here for that. Nor do we have backup invoices in the record for that.

So I would object to any testimony that Mr. Pietzsch may offer about the Topping declaration, as double hearsay, and limiting him to only what's within his personal knowledge. So if we -- if you want to proceed on that basis, I'm happy to cross-examine him -- let him give direct testimony and cross-examine him.

MR. HURLEY: Your Honor, Mr. Pietzsch's declaration includes his information he's providing that are -- obviously, his declaration with him in the courtroom we submit is not -- there's no hearsay issue with that.

With respect to the source of his figures, that is information that is, we would say, also subject to exceptions of the hearsay rule. Among other things, if allowed to testify, you will hear Mr. Pietzsch advise that he reviewed a classic business record, records of regularly conducted activity, including attorney fees -- sorry, including attorney fee-related submissions.

And so that's, I think, the kind of classic type of material that I would expect a person in Mr. Pietzsch's situation to be able to testify to. He does also reference the Topping declaration. And we would submit that the Topping declaration itself should be permitted here under the residual

exception to the hearsay rules. He should be allowed to at least identify what's in it.

The Topping declaration, Your Honor will recall, was submitted in response to this Court's direction on September 5th, that the debtors identify the damages that they intended to claim in connection with the Midas Green sanctions motion. So on September 12th, Mr. Topping provided that declaration. It's been on the docket since September 12th of 2025. So plenty of notice, obviously, to everyone concerned.

And Mr. Topping was the general counsel of the company at the time that he put the declaration in. The general counsel would be expected to have, and I believe Mr. Topping clearly had, access to the fee statements that he used to support the figures that are included in a couple of paragraphs in his declaration that Mr. Pietzsch references.

Under the circumstances, we would submit that that offers, including the fact that he was providing it in response to a court order, and that there's been ample opportunity for everybody to examine it. He offers the kind of guarantees of trustworthiness that permit under Rule 807(a), admission of something that might otherwise be considered hearsay. And 8007(a) allows for admission of those kinds of materials with the statement that's supported by sufficient guarantees of trustworthiness after considering the totality of circumstances under which it was made and evidence, if any, corroborating the

allowing him, especially in the circumstances of this case.

THE COURT: All right.

MR. THOMAS: We --

THE COURT: Yeah.

MR. THOMAS: Your Honor, we put him on our witness list. They had him, as counsel points out, submitted this declaration. I had no reason to believe that they were not going to have him available if they intended to proceed for $6 million in sanctions and not make, you know, one of their witnesses available.

So again, the burden is on Mr. Hurley and his client to produce the evidence at trial. We put him on the witness list. We had his declaration. We assumed he'd be here. We had no reason to believe he wouldn't. I saw no objection or no -- Mr. Hurley received our witness list timely. He didn't write me an email or give me a call and say, by the way, Mr. Topping won't be here. I had no notice from him. I had every reason to believe he would be here since his position is so significant to this hearing.

THE COURT: All right. Well --

MR. HURLEY: But Mr. Topping is not on our witness list, just for the record.

THE COURT: All right. So let me go ahead and the issue of the admission or not of Mr. Topping's declaration, I'm going to consider that. I'm not going to make a ruling on that

right now.

But let me go ahead and hear any cross-examination you may have of Mr. Pietzsch. I'm going to accept the declaration at Docket 2428 as his direct testimony, subject to cross-examination.

(ECF Number 2428 admitted into evidence)

THE COURT: So, Mr. Pietzsch, would you raise your right hand, sir?

JORDAN PIETZSCH, WIND DOWN DEBTOR'S WITNESS, SWORN

THE COURT: All right. Go ahead, Mr. Thomas.

MR. THOMAS: Your Honor, I'd like to get a point of clarification before I do my cross-examination.

THE COURT: All right.

MR. THOMAS: Paragraphs 3 and 4 of Mr. Pietzsch's declaration speak directly to what we've objected to as the inadmissible testimony of the Topping declaration. Are you admitting Paragraphs 3 and 4 over that objection, or are you not?

THE COURT: I am admitting his declaration as his direct testimony. You have objected to 3 and 4 on the basis that it's hearsay, and I'm taking that under advisement. So the answer to the question is, I'm going to think about whether it otherwise meets an exception to the hearsay rule. I'm not ruling on that right now.

MR. THOMAS: Okay.

THE COURT: And we'll come back at two o'clock on Thursday. Thank you.

MR. THOMAS: Thank you.

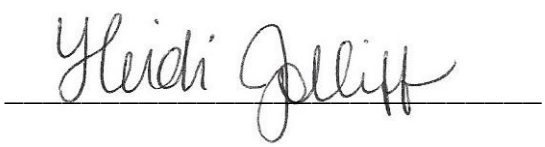
MR. HURLEY: Thank you.

(Proceedings concluded at 10:51 a.m.)

* * * * *

C E R T I F I C A T I O N

I, Heidi Jolliff, court-approved transcriber, hereby certify that the foregoing is a correct transcript from the official electronic sound recording of the proceedings in the above-entitled matter.



HEIDI JOLLIFF, AAERT NO. 2850 DATE: July 7, 2026

ACCESS TRANSCRIPTS, LLC

TAB B

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865 S. Figueroa Street, 10th Floor
Los Angeles, California 90017

October 23, 2025

Cameron Blackmon
Rhodium Enterprises, Inc.
4146 W US Highway 79
Rockdale, TX 76567

Matter #: 12875-00001
Invoice Number: 101-0000198906
Responsible Attorney: Patty Tomasco

Rhodium- restructure of company

For Professional Services through September 30, 2025 in connection with a potential restructuring of this crypto mining company.

Fees	$560,561.50
50% Non-Working Travel Discount	-$2,301.25
Net Billed Fees	$558,260.25
Expenses	$13,999.93
Net Amount	$572,260.18
Total Due This Invoice	$572,260.18
Balance Due from Previous Statement(s)	$2,445,484.14
Total Balance Due	$3,017,744.32

Confidential – May include attorney-client privileged and work-product information

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Statement Detail

i Asset Analysis and Recover

09/05/25	PT	Correspond with A. Jaquet regarding claims against 3 Way for cargo damage and evidence preservation (.2); coordinate with C. Topping regarding call with insurance adjusters and 3 Way regarding same (.2).	0.40	778.00
09/09/25	PT	Call with 3-Way Logistics representatives regarding resolution of claims for faulty transportation with C. Topping, M. Soule, J. Estes, A. Jaquet (.6); follow up review of underlying documents and contracts to ascertain rights and waivers (.9); review cases on need for signed document for damages limitation to apply (.6).	2.10	4,084.50
09/09/25	AJ4	Prepare a memorandum for P. Tomasco regarding the claim against Three Way, including by reviewing and analyzing Debtors' materials regarding same (1.2); prepare for and attend telephone conference with P. Tomasco, C. Toppings et al. regarding same (.5); research case law regarding the same and correspond with P. Tomasco regarding same (.8).	2.50	4,025.00
09/25/25	AJ4	Correspond with M. Soule regarding Rhodium's claim against Three Way (0.1); review prior correspondence in connection with the same (0.2).	0.30	483.00
		SUBTOTAL	5.30	9,370.50

ii Asset Disposition

09/04/25	PT	Review status of negotiations with Whinstone (.3) and follow up	0.40	778.00

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		correspondence with S. Lockhart to set up a call on allocation tasks(.1).		
09/10/25	PT	Correspond with M. Robinson, T. Schmeltz regarding Whinstone position and analysis (.3).	0.30	583.50
09/16/25	PT	Coordinate with K. Hays, M. Robinson and C. Wheeler regarding the status of equipment valuation and strategy for resolving allocation (.3); correspond with P. Mandarino regarding response to allocation issues (.1); correspond with C. Topping regarding the same (.2).	0.60	1,167.00
09/17/25	PT	Review sale approval orders and de minimis sales regarding incidental costs of equipment storage and comment on proposal for laydown yard lease termination (.9).	0.90	1,750.50
09/18/25	PT	Email summary of analysis of sale orders and suggest revisions to the termination agreement to link to orders with explanatory email to C. Topping and M. Soule (1.1).	1.10	2,139.50
09/24/25	PT	Correspondence regarding valuation of equipment and additional review (.3).	0.30	583.50
09/25/25	PT	Prepare for and participate in call regarding purchase price allocation with Alex Peloubet, Trace Schmeltz, Chris Wheeler, Kevin Hays, Greg Miocic, Chase Blackmon, Ashley Jonson (.9); correspondence with T. Schmeltz regarding prior correspondence with Whinstone regarding purchase price allocation (.3); follow up with K. Hays regarding comparison of asset lists and efficient methodologies for bridging gap on equipment values (.3); review and analyze exahash statistics from Riot public reports (.5).	2.00	3,890.00

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09/25/25	LMW	Emails with counsel re: Whinstone transactions and allocations (.4).	0.40	666.00
		SUBTOTAL	6.00	11,558.00

ix Employee Benefits and Pensions

09/02/25	PT	Correspondence with S. Schultz regarding Rhodium employee claims and employment agreements and correspond with L. Weber regarding same (.3).	0.30	583.50
09/02/25	PT	Correspondence with S. Schultz regarding contingent severance obligation (.2); review severance agreements and correspondence regarding same with C. Topping and L. Weber (.6); review prior research in preparation for call (.4).	1.20	2,334.00
09/02/25	LMW	Review of the employee executive agreements (1.4); emails to S. Schulz re: same (.2).	1.60	2,664.00
09/03/25	LMW	Review terms of contingent benefit agreements (3.3); emails to A. Catatao re: same (.2); emails to S. Schultz re: CSBAs (.3).	3.80	6,327.00
09/04/25	PT	Prepare for and participate in a conference call with A. Catatao, C. Topping, L. Weber, C. Blackmon regarding status of contingent severance agreements and employee benefits provisions of plan (.9); prepare for and participate in update conference call with S. Schultz, L. Weber and M. Hurley regarding employee severance claims exhibit to plan (.8).	1.70	3,306.50
09/04/25	LMW	Call with S. Schultz re: severance schedule (.5); review terms of same (1.2).	1.70	2,830.50

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09/05/25	LMW	Review and revise summary chart re: employee payments (2.8); emails to A. Catatao re: same (.2); emails to S. Schultz re: severance (.3).	3.30	5,494.50
09/05/25	PT	Coordinate with L. Weber regarding the information requests from the Akin team regarding employee severance claims (.2).	0.20	389.00
09/08/25	LMW	Emails with A. Catatao re: severance (.4); emails to S. Schultz re: same (.8); review of treatment for executive treatment and post-petition agreements (2.4).	3.60	5,994.00
09/10/25	LMW	Follow-up emails re: severance benefits (.6).	0.60	999.00
09/24/25	AJ4	Correspond with A. Popescu regarding employee severance questions (0.1).	0.10	161.00
09/24/25	PT	Correspondence with A. Catatao and L. Weber regarding employee severance issues (.1); correspondence with S. Kitei regarding employee severance claims (.4) and correspond with L. Weber regarding response (.2).	0.70	1,361.50
09/29/25	LMW	Call with A. Catatao re: severance (.4); emails to the Quinn Enanuel team re: same (.3).	0.70	1,165.50
09/30/25	LMW	Call with S. Kitei re: severance payments (.3); review of the severance schedule re: same (.5); call to C. Topping re: severance payments (.1); emails to Quinn Emanuel team re: same (.2).	1.10	1,831.50
		SUBTOTAL	20.60	35,441.50

v Business Operations

09/03/25	RH9	Review documents related to intercompany transactions (.6).	0.60	789.00
09/22/25	PT	Coordinate the routing of the return of the expert witness retainer to the company (.1).	0.10	194.50
09/25/25	PT	Conference with purported IRS agent regarding form of tax return and follow up with K. Hays regarding inquiry (.7).	0.70	1,361.50
		SUBTOTAL	1.40	2,345.00

vi Case Administration

09/01/25	AJ4	Attend a telephone conference with P. Tomasco, B. Roth et al. regarding case status and next steps (.6).	0.60	966.00
09/01/25	BR4	Call (partial) with Quinn Emanuel and Province team regarding case updates (.5).	0.50	805.00
09/02/25	RH9	Conference with Quinn Emanuel team to discuss next steps (.6).	0.60	789.00
09/02/25	BR4	Call with R. Harrington regarding SAFE decision (.2); emails regarding the Committee's motion (.1).	0.30	483.00
09/02/25	BH2	Review Pacer docket (.3) and download recently filed pleadings for attorneys' review (.5); forward to the Client (.1).	0.90	589.50
09/02/25	LMW	Call with Quinn Emanuel team re: case updates (.6).	0.60	999.00
09/02/25	PT	Prepare an agenda for (.3) and participate in a team call with M. Robinson, A. Popescu, R. Izakelian, R. Harrington, A. Jaquet regarding planning and strategy (.6).	0.90	1,750.50
09/02/25	RI	Conference with Quinn Emanuel and Province teams regarding case strategy and assignments (0.6).	0.60	999.00

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09/03/25	LMW	Emails to B. Howell re: S drive access (.2.).	0.20	333.00
09/04/25	PT	Prepare for (.3) and participate in a call with R. Izakelian, B. Roth, L. Maseti, L. Weber, A. Popescu, M. Robinson, R. Harrington regarding projects and strategy (.4).	0.70	1,361.50
09/04/25	RI	Conference with Quinn Emanuel team regarding case strategy and assignments (0.4).	0.40	666.00
09/04/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (.4).	0.40	644.00
09/04/25	NM7	Team conference meeting (.4).	0.40	466.00
09/05/25	BR4	Call with the Quinn Emanuel team regarding case updates (.5).	0.50	805.00
09/05/25	PT	Planning and strategy meeting with R. Izakelian, R. Harrington, A. Jaquet, L. Weber (.5).	0.50	972.50
09/05/25	NM7	Team conference meeting (.5).	0.50	582.50
09/08/25	RH9	Participate in the team meeting to discuss case strategy and next steps (.5).	0.50	657.50
09/08/25	BR4	Prepare for (.2) and call with the Quinn Emanuel team regarding case updates (.5); emails regarding same (.1).	0.80	1,288.00
09/08/25	BH2	Prepare a pleading notebook for P. Tomasco for the September 8th hearing (.5).	0.50	327.50
09/08/25	NM7	Team conference meeting (.5).	0.50	582.50
09/08/25	AJ4	Attend the telephone conference with P. Tomasco, G. Pusavat et al. regarding case status and next steps (.5).	0.50	805.00

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09/08/25	RI	Conference with Quinn Emanuel team regarding case strategy and assignments (.5).	0.50	832.50
09/08/25	PT	Conference with R. Harrington, R. Izakelian, B. Roth, A. Jaquet, L. Maseti regarding projects and strategy (.5).	0.50	972.50
09/08/25	BH2	Review ECF filings received over the last few days (.5) and update files for the attorneys' review (.3); forward documents to the Client (.2).	1.00	655.00
09/09/25	BR4	Call with the Quinn Emanuel and Province teams regarding case updates (.5).	0.50	805.00
09/09/25	PT	Participate in coordination call with M. Robinson, A. Popescu, A. Jaquet, R. Izakelian, R. Harrington (.5).	0.50	972.50
09/09/25	RI	Conference with the Quinn Emanuel and Province teams regarding case strategy and assignments (.5).	0.50	832.50
09/09/25	NM7	Team conference meeting (.5).	0.50	582.50
09/09/25	RH9	Prepare for (.2) and participate in the conference with the Quinn Emanuel team to discuss next steps (.5).	0.70	920.50
09/10/25	PT	Coordination and planning call with R. Izakelian, G. Pusavat, L. Maseti, A. Jaquet, L. Weber (.5).	0.50	972.50
09/10/25	BR4	Prepare for (.2) and participate in a call with the Quinn Emanuel team regarding case updates (.5).	0.70	1,127.00
09/10/25	RH9	Conference with the Quinn Emanuel team to discuss next steps (.5).	0.50	657.50
09/10/25	LMW	Call with Quinn Emanuel team re: case updates (.5).	0.50	832.50
09/10/25	RI	Conference with the Quinn Emanuel team regarding case strategy and assignments (.5).	0.50	832.50

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09/10/25	NM7	Prepare for (.2) and attend the team conference meeting (.5).	0.70	815.50
09/11/25	PT	Participate in a conference call with M. Robinson, A. Propescu, A. Jaquet, R. Harrington (.5); follow up with B. Howell regarding misfiled sealed document and retrieval of same (.2).	0.70	1,361.50
09/11/25	RH9	Prepare for (.2) and attend the conference call with the Quinn Emanuel team and Province to discuss case strategy (.5).	0.70	920.50
09/11/25	RI	Prepare for (.5) and attend conference call with Quinn Emanuel and Province teams regarding case strategy and assignments (.5).	1.00	1,665.00
09/12/25	PT	Participate in the coordination call with R. Izakelian, B. Roth, R. Harrington, A. Jaquet (.5).	0.50	972.50
09/12/25	BR4	Call with the Quinn Emanuel team regarding case updates and plan structure (.5).	0.50	805.00
09/12/25	RH9	Conference with the Quinn Emanuel team and Province to discuss case strategy (.5).	0.50	657.50
09/13/25	BR4	Review filings and emails regarding plan (0.4).	0.40	644.00
09/15/25	PT	Prepare for (.1) and participate in the coordination call with Alain Jaquet, Ben Roth, Lindsay Weber, Rachel Harrington, Razmig Izakelian (.5).	0.60	1,167.00
09/15/25	BR4	Call with the Quinn Emanuel team regarding case updates (.7).	0.70	1,127.00
09/15/25	RH9	Conference with the Quinn Emanuel team to discuss case strategy (.5).	0.50	657.50
09/15/25	RI	Conference with Quinn Emanuel and Province teams regarding case strategy and assignments (0.5).	0.50	832.50

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09/16/25	RH9	Conference with Quinn Emanuel team to discuss case strategy (.5).	0.50	657.50
09/16/25	BR4	Prepare for (.7) and participate in the call with the Quinn Emanuel and Province teams regarding case updates (.5).	1.20	1,932.00
09/16/25	PT	Participate in the coordination and strategy call with Michael Robinson, Alain Jaquet, Ben Roth, Rachel Harrington, Razmig Izakelian (.5).	0.50	972.50
09/16/25	RI	Conference with Quinn Emanuel team regarding case strategy and assignments (.5).	0.50	832.50
09/18/25	AJ4	Attend the telephone conference with P. Tomasco, A. Popescu, et al. regarding case status and next steps (.5).	0.50	805.00
09/18/25	BR4	Call with the Quinn Emanuel and Province teams regarding case updates (.5).	0.50	805.00
09/18/25	RI	Conference with the Quinn Emanuel and Province teams regarding case strategy and assignments (.5).	0.50	832.50
09/19/25	BH2	Finalize the Certificates of No Objections as requested by A. Jaquet (.4); and file same (.5).	0.90	589.50
09/19/25	PT	Participate in the call with Alain Jaquet, Ben Roth, Daniel Holzman, Eric Winston, Grace Pusavat, Laura Santos-Bishop, Lelwa Maseti, Lindsay Weber, Rachel Harrington, Razmig Izakelian (.5).	0.50	972.50
09/19/25	BR4	Call with the Quinn Emanuel team regarding case updates (partial attendance) (.2).	0.20	322.00
09/19/25	NM7	Team conference meeting (attend partial meeting) (.2).	0.20	233.00

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09/19/25	BH2	Review the Pacer docket (.4) and update files to current status (.5).	0.90	589.50
09/22/25	RI	Conference with the Quinn Emanuel team regarding case strategy and assignments (.5).	0.50	832.50
09/22/25	PT	Participate in the strategy call with Alain Jaquet, Ben Roth, Lindsay Weber, Rachel Harrington, Razmig Izakelian (.5).	0.50	972.50
09/22/25	NM7	Team conference meeting (.5).	0.50	582.50
09/22/25	BR4	Call with the Quinn Emanuel team regarding case updates (.5); call with R. Izakelian regarding research (.3).	0.80	1,288.00
09/22/25	BH2	File the 19 separate Monthly Operating Reports (1.3).	1.30	851.50
09/23/25	AJ4	Attend the telephone conference with P. Tomasco, G. Pusavat et al. regarding case status and next steps (.4).	0.40	644.00
09/23/25	PT	Prepare for (.1) and participate in planning call with Michael Robinson, Alain Jaquet, Ben Roth, Lelwa Maseti, Lindsay Weber, Rachel Harrington, Razmig Izakelian (.4).	0.50	972.50
09/25/25	PT	Prepare for (.1) and attend strategy and planning call with Michael Robinson, Lindsay Weber, Rachel Harrington, Razmig Izakelian, Alain Jaquet, Ben Roth (.4).	0.50	972.50
09/30/25	BH2	Review Pacer docket (.3) and forward recently filed documents to the Client (.2).	0.50	327.50
		SUBTOTAL	38.50	56,479.50

vii Claims Administration and Objections

09/01/25	RH9	Draft Rule 11 motion (5.6).	5.60	7,364.00

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09/02/25	AJ4	Prepare a memorandum regarding the status of the first omnibus claim objection based on satisfied claims and other substantive grounds (.2); correspond with P. Tomasco regarding the same (.1).	0.30	483.00
09/02/25	PT	Correspondence with S. Schultz regarding an update on the Midas Green claim objection (.2); review and revise motion for sanctions and correspond with R. Harrington regarding client review (.6); review and comment on second omnibus 510(b) claim objection and coordinate the certificate of no objection for the first omnibus claim objection (.3).	1.10	2,139.50
09/02/25	PT	Review and revise the second omnibus claim objection to equity-type claims (.7); correspondence with C. Topping and M. Soule regarding same (.2); follow up with R. Harrington regarding analysis of penny warrants issue for incorporation (.2).	1.10	2,139.50
09/02/25	NM7	Team conference meeting (.6); review SAFE AHG's limited response to the Debtors' omnibus objection to certain claims (.4); research case law re lack of standing of SAFE AHG to object to Debtors' omnibus objection to certain claims (3.0).	4.00	4,660.00
09/02/25	RH9	Draft Rule 11 motion (4.0); incorporate comments and revisions (1.1).	5.10	6,706.50
09/03/25	RH9	Call with E. Brannen to discuss Topping declaration (.2).	0.20	263.00
09/03/25	AJ4	Review and revise the draft second omnibus objection regarding satisfied claims and other substantive grounds (2.8); correspond with P. Tomasco, A.	3.00	4,830.00

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		Popescu and F. Sabzevari regarding the same (.2).		
09/04/25	PT	Prepare for and participate in a conference call with S. Schultz, M. Hurley, E. Brannen, R. Harrington regarding the Midas Green claim objection (.5); correspond with E. Brannen regarding revisions to the motion for sanctions and timing of hearing (.2); coordinate with A. Jaquet to enter stipulations regarding claim withdrawals (.3); review and coordinate the response to Midas' motion to withdraw the reference and lateness analysis (.9); draft of second omnibus 510(b) objection (.2); conference with M. Robinson regarding same (.2).	2.30	4,473.50
09/04/25	BH2	Finalize (.9) and file the Motion for Sanctions (.3).	1.20	786.00
09/04/25	RH9	Attend meeting to discuss Midas' claims (.2); draft response to motion to withdraw reference (2.0).	2.20	2,893.00
09/04/25	AJ4	Review and revise the draft stipulation regarding withdrawal of claims (.5); correspond and confer with G. Graham and P. Tomasco regarding the same (.6).	1.10	1,771.00
09/04/25	AJ4	Review and revise the draft second omnibus objection regarding satisfied claims and other substantive grounds, including by reviewing related Debtors' documents (2.8); correspond with L. Maseti and R. Harrington regarding the same (.2); correspond and confer with F. Sabzevari regarding the same (.3).	3.30	5,313.00
09/05/25	BH2	Finalize (.7) and file the proposed Stipulation between Rhodium and several claimants (.3).	1.00	655.00

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09/05/25	RH9	Draft the response to Midas' motion to withdraw the reference (2.9).	2.90	3,813.50
09/05/25	RH9	Insert missing information into the omnibus claim objection (.8).	0.80	1,052.00
09/05/25	PT	Coordinate with E. Brannen regarding the sanctions motion and fee declarations (.5); review the proposed stipulation with G. Graham to withdraw claims (.2).	0.70	1,361.50
09/05/25	AJ4	Review and revise the draft second omnibus objection regarding satisfied claims and other substantive grounds (6.5).	6.50	10,465.00
09/05/25	NM7	Review the second group of claim objections and perform citation check and research case law re same (2.9); research case law re warrants and lack of consideration (1.6).	4.50	5,242.50
09/05/25	AJ4	Review and revise the draft stipulation regarding the withdrawal of claims (.5); correspond and confer with G. Graham and P. Tomasco regarding the same (1.5).	2.00	3,220.00
09/08/25	AJ4	Prepare a draft certificate of no objection regarding omnibus claim objections relating to satisfied claims and other substantive grounds (1.0); correspond with P. Tomasco regarding same (.1).	1.10	1,771.00
09/08/25	AJ4	Review and revise the draft of the second omnibus claim objection regarding satisfied claims and other substantive grounds (7.6); correspond with L. Maseti regarding same (.1).	7.70	12,397.00
09/08/25	PT	Correspondence with S. Schultz regarding motion for sanctions in Midas Green claims objection (.2); research and update negotiation team regarding jurisdictional nature of notice of appeal (.6); coordinate	1.00	1,945.00

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		calculation of the Midas related fees (.2).		
09/08/25	BH2	Review previous fee statements and calculate the fees incurred by Quinn Emanuel re the Midas Green Technologies claim litigation (1.1).	1.10	720.50
09/08/25	NM7	Review the second group of claim objections and perform citation check and research case law re same (1.7).	1.70	1,980.50
09/09/25	BH2	Revise the chart to add the time narrative reflecting how much time was spent on the Midas Green litigation (1.3).	1.30	851.50
09/09/25	AJ4	Research case law regarding contract formation and enforcement in connection with the second omnibus claim objection based on satisfied claims and other grounds (.8); correspond with L. Maseti regarding same (.1).	0.90	1,449.00
09/09/25	RH9	Draft notice of appeal (1.8).	1.80	2,367.00
09/09/25	NM7	Research case law re warrants, lack of consideration, and lack of intent to be bound (6.3).	6.30	7,339.50
09/10/25	RH9	Communications with the team regarding Rule 11 declaration (.5).	0.50	657.50
09/10/25	RH9	Call with E. Brannen to discuss strategy for Midas hearing (.3).	0.30	394.50
09/10/25	RH9	Legal research in support of the Midas claim objection (1.7).	1.70	2,235.50
09/11/25	PT	Review and revise the notice of appeal (.2); review and revise the proposed submission on fees subject to sanction motion (.4); review and comment on the potential claims by Temple Green and counterclaims (.5).	1.10	2,139.50
09/11/25	RH9	Legal research into certain claims (3.6).	3.60	4,734.00

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09/11/25	RH9	Revisions to the appeal notice (.4).	0.40	526.00
09/12/25	PT	Correspondence with J. Norr regarding claims (.2).	0.20	389.00
09/12/25	RH9	Call with E. Brannen to discuss strategy for the Midas hearing (.3); incorporate revisions to the Topping declaration for Midas claims (.8); double check calculations in the Midas claims review and finalize declaration (.3).	1.40	1,841.00
09/12/25	NM7	Review and finalize the notice of appeal (.7).	0.70	815.50
09/12/25	BH2	Finalize (1.1) and file the Topping Declaration re Motion for Sanctions against Midas Green (.4); forward copies to the Client (.2).	1.70	1,113.50
09/13/25	PT	Conference with J. Norr regarding claims (.2).	0.20	389.00
09/13/25	BH2	Finalize (.6) and file the Notice of Appeal (.3); distribute same to the Client (.1).	1.00	655.00
09/14/25	RH9	Legal research into potential claims (1.0); draft communications (2.1).	3.10	4,076.50
09/15/25	RH9	Legal research regarding contingent claims (.4).	0.40	526.00
09/16/25	RH9	Draft response to the Midas withdrawal motion (5.5).	5.50	7,232.50
09/17/25	RH9	Draft opposition to Midas withdrawal motion (1.5); incorporate comments and revisions (2.0).	3.50	4,602.50
09/17/25	PT	Review and extensive revisions to the objection to Midas Green's motion to withdraw the reference (1.3); review and comment on J. Thomas' email regarding exhibits (.2); follow up with R. Harrington regarding hearing logistics and planning (.2).	1.70	3,306.50

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09/17/25	RH9	Create exhibit list for September 23 hearing (1.3).	1.30	1,709.50
09/18/25	AJ4	Review and revise the draft of the second omnibus claim objection based on satisfied claims and other substantive grounds (2.1); correspond with F. Sabzevani regarding claim status, including by reviewing and analyzing relating materials (.3); review and revise draft certificate of no objection and related order (1.2); correspond and confer with P. Tomasco in connection with the same (.2).	3.60	5,796.00
09/18/25	PT	Prepare for and participate in call with Rachel Harrington and Elizabeth Brannen regarding hearing logistics and strategy (.9); comment on the updated draft opposition to motion to withdraw reference (.1); review and analyze correspondence with Temple Green regarding claims and invoices (.6); conference with C. Topping regarding the history with Temple Green and additional bases to object to claims (.2); correspondence regarding drafting a claim objection to Temple Green claims and identifying counterclaims with Stris team (1.1); review and audit claims register with need for additional claim objections (.7); follow up emails with E. Brannen regarding exhibit list and expert reports (.2); final revisions and coordinate filing of the opposition to motion to withdraw reference (.7).	4.50	8,752.50
09/18/25	RH9	Draft and finalize the exhibit list for the Midas claim objection hearing (1.4).	1.40	1,841.00
09/18/25	RH9	Meeting with P. Tomasco and E. Brannen to discuss the Midas hearing	5.40	7,101.00

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		preparations (.7); revisions to the motion to withdraw the opposition brief (2.5); gather exhibits for the hearing and revise the exhibit list (2.2).		
09/18/25	NM7	Review the draft opposition to Midas Green's motion for mandatory withdrawal (1.0).	1.00	1,165.00
09/19/25	BH2	Finalize (2.1) and file the sealed exhibits for the September 23rd hearing (.9); draft the motion to seal (.4) and proposed order (.3); file the motion to seal and proposed order (.3); distribute the sealed exhibits and exhibit list to opposing counsel (.6).	4.60	3,013.00
09/19/25	BR4	Research on claims (.6).	0.60	966.00
09/19/25	PT	Review and comment on the response to motion for sanctions and analysis of reply points (.7); review Temple Green claims and proofs of claim and correspondence with Quinn Emanuel team regarding drafting issues (.9); review status of the exhibit list for the hearing and service of the exhibits (.5); attention to certificate of no objection for second omnibus equity claims objection and coordinate drafting and editing of same (.8); review and comment on the motion to seal exhibits for Midas Green hearing (.2).	3.10	6,029.50
09/19/25	BH2	Email communications with R. Harrington regarding the sealed exhibits (.4); several email communications with L. Garcia regarding preparing the exhibit notebooks for the September 23rd hearing (.5).	0.90	589.50
09/19/25	RH9	Draft reply to the rule 11 motion for sanctions (1.9).	1.90	2,498.50

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09/19/25	RH9	Revisions to the exhibit list for the Midas hearing (.8); arrange hearing logistics (.5); create presentation for hearing (3.8).	5.10	6,706.50
09/20/25	PT	Review and comment on the settlement offer from Midas Green with R. Harrington and E. Brannen (.2); review pleadings for the hearing (.5); comment to K. Halpern regarding the effect of Midas Green not filing a witness and exhibit list (.2).	0.90	1,750.50
09/21/25	NM7	Research case law re sanctions pursuant to the Patent Act for exceptional cases, sanctions for incorrect factual information in pleadings, and sanctions for bad conduct in other proceedings (2.3).	2.30	2,679.50
09/21/25	RH9	Draft rule 11 reply (6.5).	6.50	8,547.50
09/22/25	PT	Communicate with K. Halpern and E. Brannen regarding appellate standard for exclusion of evidence after brief online research (.7); review and edit reply to response on sanctions and brief research regarding Fifth Circuit law regarding same; emails with R. Harrington and L. Maseti regarding Fifth Circuit cases and various redline comparisons (1.4); review status of the Powerpoint, witness outlines, reply briefs and preparation for hearing and initial edits to the Powerpoint presentation (2.1).	4.20	8,169.00
09/22/25	AJ4	Review and revise the draft presentation regarding Midas' claims (4.6); correspond and confer with P. Tomasco regarding same (.2); correspond and confer with R. Harrington in connection with the same (.2).	5.00	8,050.00

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09/22/25	NM7	Review the motion for sanctions against Midas Green (1.4); research case law re substantially similar sanctions motions (0.7); review draft reply in support of motion for sanctions against Midas Green and research case law re same (1.5); prepare PowerPoint presentation slide deck for Midas Green claim hearing (2.8).	6.40	7,456.00
09/22/25	BH2	Review Pacer docket for documents scheduled for hearing on September 23rd, 2024 (.8) and prepare pleading notebooks for P. Tomasco, R. Harrington, and E. Brannen (.8).	1.60	1,048.00
09/22/25	RH9	Legal research into Rule 11 claims (3.5); create Midas hearing presentation (6.5).	10.00	13,150.00
09/22/25	RH9	Draft Midas rule 11 reply (3.3).	3.30	4,339.50
09/23/25	BH2	Assist with pre-hearing tasks for attorneys (1.8).	1.80	1,179.00
09/23/25	AJ4	Correspond with A. Popescu and F. Sabzevari regarding R. Hutchens' call regarding claim (0.1).	0.10	161.00
09/23/25	PT	Meeting with E. Brannen and R. Harrington regarding hearing preparation (1.1); review and revise (multiple) the hearing Powerpoint (1.4); prepare for (.6) and attend the continued hearing on the claim objection of Midas Green and Midas Green's motion and motion for sanctions (4.0); follow up conference with E. Brannen and C. Topping regarding continued hearing (.5).	7.60	14,782.00
09/23/25	RH9	Revisions to the Midas hearing presentation (1.5); handle final preparations (1.0) and attend the Midas hearing (4.0).	6.50	8,547.50

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09/24/25	AJ4	Correspond with A. Popescu regarding NYDIG's claim status (.1).	0.10	161.00
09/24/25	PT	Prepare for (.2) and attend the continued hearing on the objection to Midas Green claims (3.2).	3.40	6,613.00
09/24/25	BH2	File the slides from the September 23rd hearing with the Court (.4).	0.40	262.00
09/24/25	RH9	Assist in preparations for the Midas hearing (.3); attend the Midas hearing (3.2).	3.50	4,602.50
09/26/25	RH9	Revise the rule 11 motions (.9).	0.90	1,183.50
09/29/25	BH2	Finalize (.3) and file the Notice of Designation of Record (.3).	0.60	393.00
09/29/25	AJ4	Correspond with R. Harrington regarding the appeal designation regarding the SAFE claim objection (.2).	0.20	322.00
09/29/25	RH9	Draft designation notice and statement of issues for SAFE appeal (4.5).	4.50	5,917.50
09/29/25	RI	Review and revise the statement of issues and appeal designations (1.3).	1.30	2,164.50
09/29/25	PT	Coordinate drafting statement of issues on appeal and record designation (.3); review and suggest revisions to statement (.2).	0.50	972.50
09/29/25	RH9	Revise the sanctions motion (1.9).	1.90	2,498.50
		SUBTOTAL	205.70	287,204.00

viii Corporate Governance and board Matters

09/03/25	PT	Prepare for and participate in board meeting with Blackmons, D. Eaton, S Wells, R. Szkoda, J. Norr, M. Robinson, D. Dunn (1.5).	1.50	2,917.50
09/11/25	PT	Prepare for and participate in preparation call with D. Eaton, S.	1.60	3,112.00

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		Wells, D. Dunn, T. Schmeltz, M. Robinson (.5); prepare for and participate in board meeting with C. Blackmon, C. Blackmon, R. Szkoda, D. Eaton, D. Dunn, M. Robinson, C. Topping (1.1).		
09/18/25	PT	Prepare for and participate in preparation call with Trace Schmeltz, Michael Robinson, David Eaton, Spencer Wells, David Dunn (.4); prepare for and participate in board meeting with C. Topping, Blackmons, D. Eaton, S Wells, R. Szkoda, J. Norr (1.1).	1.50	2,917.50
		SUBTOTAL	4.60	8,947.00

x Employment and Fee Applications

09/03/25	BH2	Finalize (.4) and file the Eleventh Monthly Fee Statement of Quinn Emanuel (.3) and forward to parties listed in the Interim Compensation Order (.1).	0.80	524.00
09/08/25	BH2	Begin to prepare the August monthly fee statement (1.5).	1.50	982.50
09/09/25	BH2	Continue to prepare the August Monthly Fee Statement (4.1).	4.10	2,685.50
09/12/25	BH2	File Stris & Maher's Twelfth Monthly Fee Statement (.3).	0.30	196.50
09/17/25	PT	Coordinate updating the retention letter with Keller Williams for Twins location (.3).	0.30	583.50
09/26/25	PT	Prepare for (.1) and participate in call with Charles Topping, Andrew Popescu, Chase Blackmon, Morgan Soule regarding Keller Williams retention (.2).	0.30	583.50
09/30/25	BH2	File Barnes & Thornburg's August Monthly Fee Statement (.3) and	0.40	262.00

		forward a copy to the United States Trustee, along with the LEDES data (.1).		
09/30/25	PT	Review and comment on the Keller Williams property management addendum (.2).	0.20	389.00
		SUBTOTAL	7.90	6,206.50

xii Litigation

09/05/25	PT	Review and revise reply to Lehotsky Keller Cohn pleading (.4) and correspondence with P. Lohse regarding same (.2).	0.60	1,167.00
09/09/25	RH9	Attend and take notes on settlement discussion (.5).	0.50	657.50
09/10/25	PT	Correspond with C. Topping and T. Schmeltz regarding the strategy regarding the response to Lehotsy Keller Cohn (.3) and review and comment on the draft pleadings (.6).	0.90	1,750.50
09/11/25	BR4	Call with R. Izakelian regarding substantial contribution research (.6).	0.60	966.00
09/11/25	RH9	Legal research into substantial contributions in the Fifth Circuit (1.8).	1.80	2,367.00
09/17/25	PT	Email outlining proposed response to B. Nacol regarding non-payment of secured debt due to Akin's opposition (.3).	0.30	583.50
09/22/25	PT	Formulate response to B. Nacol regarding non-payment of secured debt (.5).	0.50	972.50
09/24/25	PT	Correspondence (multiple) with R. Hutchens and L. Lim regarding Arctos Credit and reasons for non-payment due to Akin's objection to same (.4) and follow up with A.	0.70	1,361.50

		Popescu regarding background facts (.3).		
		SUBTOTAL	5.90	9,825.50

xiii Non-working Travel

09/24/25	RH9	Flight back from Midas hearing (3.5).	3.50	4,602.50
		SUBTOTAL	3.50	4,602.50

xiv Plan and Disclosure Statement

09/01/25	AJ4	Research 11 U.S.C. 726 application regarding contingent claims (2.0).	2.00	3,220.00
09/02/25	LMW	Emails with the Quinn Emanuel team re: updates to amended plan (.6).	0.60	999.00
09/02/25	PT	Prepare for and participate in conference call with S. Schultz, M. Hurley, D. Eaton, S. Wells, T. Schmeltz regarding plan negotiations (.7); participate in follow up call with T. Schmeltz, D. Eaton, S. Wells regarding plan formulation and strategy (.6); extensive review of warrant intercompany debt and correspondence/calls with M. Robinson regarding prior research (1.7).	3.00	5,835.00
09/03/25	PT	Prepare for and participate in conference call with M. Hurley, D. Proman, S. Schultz, C. Wheeler, M. Robinson regarding tax effects of plan structures (.9); conference call with B. Funk, T. Fleming, M. Fox regarding plan structures and waterfall analysis (.8); review prior research on Black Scholes intercompany claim and correspond with M. Robinson regarding same (.3); conference with M. Robinson	2.20	4,279.00

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		regarding resolution of various plan issues (.2).		
09/04/25	LMW	Emails with Quinn Emanuel team re: tax allocation issues (.4).	0.40	666.00
09/05/25	PT	Plan status call with M. Fox, B. Funk, T. Schmeltz and C. Potter (.8).	0.80	1,556.00
09/08/25	PT	Correspondence with T. Schmeltz and M. Robinson regarding negotiation update (.2); plan negotiation update call with T. Schmeltz, B. Funk, M. Fox, C. Potter (.6); preparation call with T. Schmeltz, M. Robinson, C. Topping, D. Eaton, S. Wells (.8); prepare for and attend status conference on confirmation schedule (.9); follow up conference with M. Robinson (.6).	3.10	6,029.50
09/09/25	PT	Plan negotiation update call with T. Schmeltz, C. Topping, K. Matsoukas (.9).	0.90	1,750.50
09/11/25	LMW	Call with Quinn Emanuel team re: revised plan and disclosure statement (.6); emails to B. Roth re: same (1.4); call with B. Roth re: plan revisions (.4); review and revise same (2.9); prepare the update to the disclosure statement (1.2).	6.50	10,822.50
09/11/25	PT	Emails regarding plan structure (.4).	0.40	778.00
09/11/25	BR4	Emails regarding plan structure (.4).	0.40	644.00
09/12/25	PT	Prepare for and participate in conference call with C. Wheeler, C. Blackmon, R. Staff, S. Thomas, A. Popescu, M. Robinson regarding tax waterfall and projections for revised plan terms (1.1).	1.10	2,139.50
09/12/25	BR4	Emails regarding plan structure (.2); review plan (.6).	0.80	1,288.00
09/12/25	RI	Review filings and emails regarding the plan (.4).	0.50	832.50

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09/12/25	LMW	Review and revise the amended plan and disclosure statement (4.7).	4.70	7,825.50
09/13/25	LMW	Review and revise the plan and disclosure statement (5.2); emails to B. Roth re: same (.4).	5.60	9,324.00
09/14/25	BR4	Review and revise the Plan (3.0).	3.00	4,830.00
09/14/25	LMW	Review and revise the plan (8.2); emails to the Quinn Emanuel team re: same (.4); emails to B. Roth re: updates on appeals and claim objections (.3); emails to P. Tomasco re: Transcend party treatment (.3).	9.20	15,318.00
09/15/25	PT	Correspondence regarding the plan terms for interest on unsecured claims with T. Schmeltz (.2); review cases on interest on unsecured claims and correspond with R. Izakelian regarding same (.4); review and revise the updated plan draft (.9); correspond with T. Schmeltz, D. Dunn, D. Eaton, M. Robinson regarding the updated draft plan (.5); telephone conference with M. Robinson (.5).	2.50	4,862.50
09/15/25	BR4	Call with L. Weber regarding the plan (0.2); review the plan and emails regarding same (.5).	0.50	805.00
09/15/25	LMW	Call with the Quinn Emanuel team re: amended plan (.7); review and revise same (4.4).	5.10	8,491.50
09/16/25	RI	Conference with P. Tomasco and L. Weber regarding the plan (.5).	0.50	832.50
09/16/25	PT	Coordinate plan updates based on current negotiations and analysis of required changes (1.1); correspond with C. Topping regarding plan exhibits (.2).	1.30	2,528.50
09/16/25	LMW	Call with the Quinn Emanuel team re: plan amendments (.5); legal	2.20	3,663.00

		research re: absolute priority (1.4); emails to the Quinn Emanuel team re: same (.3).		
09/17/25	LMW	Review and revise the disclosure statement (3.2); call with the Quinn Emanuel team re: same (.5).	3.70	6,160.50
09/22/25	LMW	Emails with the Quinn Emanuel team re: updated plan status (.8).	0.80	1,332.00
09/23/25	PT	Prepare for (.1) and attend status conference (.1).	0.20	389.00
09/23/25	LMW	Emails with the Quinn Emanuel team re: severance issues and plan confirmation (.7).	0.70	1,165.50
09/29/25	LMW	Emails with B. Roth re: plan amendments (.3); review and revise same (2.8).	3.10	5,161.50
09/30/25	LMW	Review of updates re: plan terms (3.2).	3.20	5,328.00
		SUBTOTAL	69.00	118,856.50

xvi Tax

09/02/25	PT	Prepare for (.3) and participate in conference call with C. Wheeler, M. Robinson, K. Hays regarding tax allocation project and strategy (.6).	0.90	1,750.50
09/05/25	PT	Correspondence with S. Lockhart regarding tax allocation (.2); call with S. Lockhart, C. Matthews, T. Schmeltz, W. Jackman and Ernst & Young team regarding tax allocation (1.1); coordinate with K. Hays regarding updated transferred property list and coordinate with S. Lockhart regarding same (.6).	1.90	3,695.50
09/10/25	PT	Conference with S. Lockhart regarding Whinstone approach to tax allocation (.7); prepare for and	1.50	2,917.50

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		participate in conference call with K. Hays and C. Wheeler regarding tax allocation valuation issues and coordination (.8).		
09/11/25	PT	Conference call with C. Wheeler and K. Hays regarding tax allocation (.7).	0.70	1,361.50
		SUBTOTAL	5.00	9,725.00

Fee Summary

Attorneys	Init.	Title	Hours	Rate	Amount
Patty Tomasco	PT	Partner	83.40	1,945.00	162,213.00
Razmig Izakelian	RI	Associate	7.80	1,665.00	12,987.00
Lindsay M. Weber	LMW	Associate	63.90	1,665.00	106,393.50
Alain Jaquet	AJ4	Associate	41.80	1,610.00	67,298.00
Ben Roth	BR4	Associate	13.90	1,610.00	22,379.00
Rachel Harrington	RH9	Associate	102.10	1,315.00	134,261.50
Nqulelwa Maseti	NM7	Associate	30.20	1,165.00	35,183.00

Case Assistants	Init.	Title	Hours	Rate	Amount
Barbara J Howell	BH2	Paralegal	30.30	655.00	19,846.50

Expense Summary

Description		Amount
Meals during travel		30.74
Express mail		44.42
Filing fee(s)		298.00
Hearing transcript(s)		155.15
Online Research		0.00
Document Reproduction	0.10	584.10
Travel		205.04
Color Document Reproduction	0.25	10.25
Word processing		0.00
Hotel		979.46

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October 23, 2025 Matter #: 12875-00001
Page 29 Invoice Number: 101-0000198906

Description	Amount
Velobind	21.21
Air travel	553.48
Local meals	187.35
Document Services	5,112.55
Tabs	33.75

Litigation Support Costs

RelOne User Fee	0.00
RelOne Repository Hosting (Per GB)	1,479.14
RelOne Active Hosting (Per GB)	4,305.29
Total Expenses	$13,999.93

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865 S. Figueroa Street, 10th Floor
Los Angeles, California 90017

November 13, 2025

Cameron Blackmon
Rhodium Enterprises, Inc.
4146 W US Highway 79
Rockdale, TX 76567

Matter #: 12875-00001
Invoice Number: 101-0000199491
Responsible Attorney: Patty Tomasco

Rhodium- restructure of company

For Professional Services through October 31, 2025 in connection with a potential restructuring of this crypto mining company.

Fees	$531,867.00
50% Non-Working Travel Discount	-$8,245.50
Net Billed Fees	$523,621.50
Expenses	$9,185.30
Net Amount	$532,806.80
Total Due This Invoice	$532,806.80
Balance Due from Previous Statement(s)	$3,017,744.32
Total Balance Due	$3,550,551.12

Confidential – May include attorney-client privileged and work-product information

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Statement Detail

i Asset Analysis and Recover

10/02/25	PT	Coordinate finalization of 3 Way counteroffer with A. Jaquet (.3).	0.30	583.50
		SUBTOTAL	0.30	583.50

ii Asset Disposition

10/08/25	PT	Correspondence with M. Moore regarding physical property valuation data (.2); attend call with S. Lockhart re Rhodium Tax Allocation update (.8).	1.00	1,945.00
10/15/25	BH2	Revise the Motion to Enforce the Purchase and Sale Agreement and proposed order (2.1).	2.10	1,375.50
10/15/25	PT	Review and comment on tax allocation motion (.2).	0.20	389.00
10/16/25	PT	Update email regarding status of tax allocation with Whinstone (.3).	0.30	583.50
10/17/25	PT	Participate in purchase price allocation call with P. Lohse, T. Schmeltz, C. Wheeler, M. Robinson, A. Popescu, and K. Hays (.6); coordinate conforming revisions to purchase price allocation motion (.2).	0.80	1,556.00
10/17/25	BH2	Revise the Motion to Enforce the Purchase and Sale Agreement pursuant to Ms. Tomasco's request (.8).	0.80	524.00
10/19/25	PT	Prepare for and participate in call to discuss allocation for tax purposes with P. Lohse, T. Schmeltz; S. Wells, D. Eaton, C. Topping, M. Robinson (.7).	0.70	1,361.50
10/20/25	PT	Review and revise motion to enforce the purchase and sale agreement (.6)	0.70	1,361.50

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		and circulate to the special committee for comment (.1).		
10/28/25	PT	Review and extensive revision to motion to enforce the purchase and sale agreement to correspond with defined terms in agreement and order (1.1); correspond with P. Lohse regarding same (.1); second set of revisions and redlines to circulate to plan parties with comments (.8); coordinate finalization and filing of motion to enforce purchase and sale agreement (.4).	2.40	4,668.00
10/28/25	BH2	Finalize the Motion to Enforce the Purchase and Sale Agreement with Whinstone (1.1) and file same (.3).	1.40	917.00
10/29/25	PT	Review de minimis sale order and coordinate draft report of equipment auction (.6).	0.60	1,167.00
		SUBTOTAL	11.00	15,848.00

ix Employee Benefits and Pensions

10/01/25	LMW	Emails with counsel re: severance agreements (.6).	0.60	999.00
10/08/25	LMW	Emails to the Quinn Emanuel team re: severance payments (.5).	0.50	832.50
10/20/25	LMW	Call with A. Chiarello re: severance agreement (.4); review of filed claim re: same (.7).	1.10	1,831.50
10/21/25	LMW	Review proposal re: C. Zoeren severance (.4); emails to Quinn Emanuel team re: same (.2); review and revise severance schedule (.7); call with A. Catatao re: same (.9); emails to the Quinn Emanuel team re: updated schedule (.2).	2.40	3,996.00

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10/22/25	LMW	Emails to P. Tomasco re: severance payments (.3); emails to S. Schultz re: same (.3).	0.60	999.00
10/23/25	LMW	Emails to S. Schultz re: employee compensation (.4); review and revise schedule re: same (.6).	1.00	1,665.00
10/24/25	LMW	Review and revise the severance schedule (.4); emails to the Quinn Emanuel team re: same (.2).	0.60	999.00
10/27/25	LMW	Emails with SAFE Group re: severance payments (.6); call with SAFE Group re: same (.5); update confirmation brief (3.6).	4.70	7,825.50
		SUBTOTAL	11.50	19,147.50

v Business Operations

10/23/25	PT	Respond to Ft. Stockton inquiry and coordinate with C. Blackmon (.1).	0.10	194.50
		SUBTOTAL	0.10	194.50

vi Case Administration

10/01/25	PT	Prepare for (.1) and participate in the daily call with A. Jacquet, B. Roth, L. Weber, R. Harrington and R. Izakelian (.4); correspond with C. Topping regarding court scheduling issues (.1).	0.60	1,167.00
10/01/25	NM7	Prepare for (.1) and participate in the Team conference meeting (0.4).	0.50	582.50
10/01/25	LMW	Call with the Quinn Emanuel team re: case updates (.4).	0.40	666.00
10/01/25	BH2	Review Pacer docket (.3) and update files to current status (.3).	0.60	393.00
10/02/25	NM7	Team conference meeting (0.5).	0.50	582.50

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10/02/25	PT	Prepare for (.5) and attend status and scheduling conference on all pending matters with M. Soule, C. Topping, A. Jaquet, B. Roth, G. Pusavat, E. Winston, D. Holzman, L. Santos-Bishop, L. Maseti, L. Weber, R. Harrington, R. Izakelian (.5).	1.00	1,945.00
10/02/25	PT	Participate in the daily call with M. Robinson, Andrew Popescu,A. Jacquet, B. Roth, D. Holzman, E. Winston, G. Pusavat, L. Santos-Bishop, L. Maseti, L. Weber, R. Harrington, R. Izakelian (.5).	0.50	972.50
10/02/25	RI	Conference with the Quinn Emanuel team regarding case strategy and assignments (0.5).	0.50	832.50
10/02/25	AJ4	Attend telephone conference with P. Tomasco, M. Robinson et al. Regarding case status and next steps (0.5).	0.50	805.00
10/03/25	BH2	Review the Pacer docket for new filings (.5) and update files to the current status, including calendaring deadlines and hearing dates (.5).	1.00	655.00
10/06/25	AJ4	Attend a telephone conference with P. Tomasco et al. Regarding case status and next steps (0.5).	0.50	805.00
10/06/25	NM7	Prepare for (.3) and attend the Team conference call (0.5).	0.80	932.00
10/06/25	LMW	Call with the Quinn Emanuel team re: case status (.5).	0.50	832.50
10/06/25	RI	Conference with Quinn Emanuel team regarding case strategy and assignments (0.5).	0.50	832.50
10/06/25	PT	Participate in call with A. Jaquet, B. Roth, G. Pusavat, E. Winston, D. Holzman, L. Santos-Bishop, L. Maseti, L. Weber, R. Harrington, R. Izakelian (.5).	0.50	972.50

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November 13, 2025 Matter #: 12875-00001

 Invoice Number: 101-0000199491

10/06/25	BH2	Review Pacer docket (.4) and download recently filed documents for attorneys' review (.3).	0.70	458.50
10/07/25	AJ4	Attend the telephone conference with P. Tomasco et al. Regarding case status and next steps (0.5).	0.50	805.00
10/07/25	RI	Conference with Quinn Emanuel team regarding case strategy and assignments (0.5).	0.50	832.50
10/07/25	PT	Participate in the daily team call with M. Robinson, A. Popescu, A. Jaquet, B. Roth, L. Weber, R. Harrington, R. Izakelian (.50).	0.50	972.50
10/07/25	LMW	Call with the Quinn Emanuel team re: case updates (.5).	0.50	832.50
10/08/25	NM7	Team conference call (0.5).	0.50	582.50
10/08/25	PT	Participate in a call with A. Jacquet, B. Roth, L. Weber, R. Harrington, and R. Izakelian regarding strategy (.5).	0.50	972.50
10/08/25	BH2	Review Rhodium Pacer docket (.3) and update the files to the current status (.3).	0.60	393.00
10/09/25	BH2	Review (.5) and file numerous amended schedules in the Rhodium bankruptcy case (.9).	1.40	917.00
10/10/25	BR4	Call with the Quinn Emanuel team regarding case updates (0.5).	0.50	805.00
10/10/25	AJ4	Attend the telephone conference with P. Tomasco et al. Regarding case status and next steps (0.5).	0.50	805.00
10/10/25	PT	Participate in the coordination and strategy call A. Jacquet, L. Weber, R. Harrington, R. Izakelian (.5).	0.50	972.50
10/13/25	RI	Conference with the Quinn Emanuel team regarding assignments (0.5).	0.50	832.50
10/13/25	NM7	Team conference meeting (0.5).	0.50	582.50

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10/13/25	AJ4	Attend the telephone conference call with P. Tomasco et al. Regarding case status and next steps (0.5).	0.50	805.00
10/13/25	LMW	Call with Quinn Emanuel team re: case updates (.5).	0.50	832.50
10/13/25	PT	Participate in a strategy call with A. Jaquet, B. Roth, L. Weber, R. Harrington, and R. Izakelian (5).	0.50	972.50
10/13/25	BR4	Call with the Quinn Emanuel team regarding case updates (0.5).	0.50	805.00
10/14/25	RI	Conference call with Quinn Emanuel team regarding case strategy and assignments (0.5).	0.50	832.50
10/14/25	PT	Participate in the planning call with Michael Robinson, A. Popescu, A. Jacquet, B. Roth, L. Weber, R. Harrington, and R. Izakelian (.5).	0.50	972.50
10/14/25	AJ4	Attend the telephone conference with P. Tomasco et al. Regarding case status and next steps (0.5).	0.50	805.00
10/14/25	BH2	Review Pacer docket and download recently filed pleadings (.4) and forward to the attorneys and the Client for review (.3).	0.70	458.50
10/15/25	NM7	Team conference meeting (0.4).	0.40	466.00
10/15/25	AJ4	Attend part of the telephone conference with P. Tomasco, et al. Regarding case status and next steps (0.4).	0.40	644.00
10/15/25	BH2	Compare the hearing transcripts on file with the Court with the hearing transcripts in the Quinn Emanuel files (.5) and complete Transcript Order Forms to obtain missing transcripts (.6); file the Transcript Order Forms with the Court (.4).	1.50	982.50

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10/16/25	BR4	Call with the Quinn Emanuel and Province teams regarding case updates (0.6).	0.60	966.00
10/16/25	PT	Participate in coordination call with Michael Robinson, A. Popescu, A. Jaquet, L. Weber, R. Harrington, and R. Izakelian (.6).	0.60	1,167.00
10/20/25	AJ4	Attend the telephone conference call with P. Tomasco, R. Harrington et al. Regarding case status and next steps (0.5).	0.50	805.00
10/20/25	PT	Prepare for (.1) and participate in the planning and strategy call with A. Jaquet, B. Roth, L. Weber, R. Harrington, and R. Izakelian (.5).	0.60	1,167.00
10/20/25	BR4	Prepare for (0.2) and conference call with the Quinn Emanuel team regarding case updates and disclosure statement hearing (0.5); call with R. Izakelian regarding research (0.2).	0.90	1,449.00
10/21/25	BR4	Call with Quinn Emanuel, Province and Barnes & Thornburg teams regarding case updates (0.4).	0.40	644.00
10/21/25	AJ4	Prepare for (.1) and attend telephone conference with P. Tomasco, A. Popescu et al. In connection with case status and next steps (0.4).	0.50	805.00
10/21/25	PT	Prepare for (.2) and participate in the planning and strategy call with Barnes and Thornburg attorneys, Michael Robinson, A. Popescu, B. Roth, L. Weber, R. Harrington and R. Izakelian (.4).	0.60	1,167.00
10/21/25	BH2	Review Pacer docket (.5) and update files to current status for attorneys' review (.5).	1.00	655.00
10/22/25	BR4	Call with the Quinn Emanuel team regarding case updates (0.3).	0.30	483.00

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10/22/25	PT	Strategy call with A. Jaquet, B. Roth, L. Weber, R. Izakelian (.3).	0.30	583.50
10/22/25	BH2	File the 19 monthly operating reports (one for each company) (.9); download the file-stamped operating reports for attorneys' review (.5).	1.40	917.00
10/23/25	BR4	Prepare for (.2) and attend the call with Quinn Emanuel Province and Barnes & Thornburg teams regarding case updates (0.5); emails regarding same (0.3).	1.00	1,610.00
10/23/25	PT	Prepare for (.1) and participate in the strategy call with Barnes & Thornburg team, Michael Robinson, A. Popescu, A. Jaquet, B. Roth, L. Weber, and R. Izakelian (.5).	0.60	1,167.00
10/23/25	LMW	Call with QE team re: case updates (.5).	0.50	832.50
10/23/25	RI	Prepare for (.3) and attend the conference call with the Quinn Emanuel team regarding case strategy and assignments (0.5).	0.80	1,332.00
10/23/25	BH2	Email communications with P. Lohse regarding hearing transcripts in Rhodium (.2); review Pacer docket for the status of the hearing transcripts of the October hearings (.2).	0.40	262.00
10/24/25	AJ4	Attend the telephone conference with P. Tomasco et al. Regarding case status and next steps (0.5).	0.50	805.00
10/24/25	PT	Participate in the coordination call A. Jaquet, L. Weber, and R. Izakelian; L. Maseti (.5).	0.50	972.50
10/24/25	BH2	Receive numerous hearing transcripts in Rhodium and forward same to the Client, attorneys at Barnes & Thornburg, and Quinn Emanuel attorneys (.4).	0.40	262.00

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10/24/25	RI	Conference with Quinn Emanuel team regarding case strategy and assignments (0.5).	0.50	832.50
10/24/25	BH2	Review the Pacer docket (.2) and download recently filed documents (.3); calendar deadlines (.2).	0.70	458.50
10/27/25	PT	Planning call with B. Roth, L. Weber, R. Izakelian, A. Jaquet (.5).	0.50	972.50
10/27/25	NM7	Team conference meeting (0.5).	0.50	582.50
10/27/25	RI	Conference call with Quinn Emanuel team regarding case strategy and assignments (0.5).	0.50	832.50
10/27/25	BR4	Call with Quinn Emanuel team regarding case updates (0.5).	0.50	805.00
10/28/25	NM7	Prepare for (.2) and participate in the Team conference meeting (0.5).	0.70	815.50
10/28/25	PT	Prepare for (.1) and participate in a call with Michael Robinson, A. Popescu, A. Jaquet, B. Roth, L. Weber, R. Harrington, R. Izakelian, and the Barnes & Thornburg team to coordinate projects and confirmation preparation (..5).	0.60	1,167.00
10/28/25	RI	Prepare for (.3) and attend conference call with Quinn Emanuel team regarding case strategy and assignments (0.5).	0.80	1,332.00
10/28/25	AJ4	Attend the telephone conference with P. Tomasco, M. Robinson et al. Regarding case status and next steps (0.5).	0.50	805.00
10/29/25	BR4	Emails regarding case scheduling (0.1).	0.10	161.00
10/29/25	PT	Address invoice issues with K. Lee regarding housekeeping for Twins facility and review sale orders (.2).	0.20	389.00

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10/29/25	BH2	Review Pacer docket (.8) and update files for attorneys' review (.8); calendar hearing dates and deadlines (.4).	2.00	1,310.00
10/30/25	BR4	Call with Quinn Emanuel, Province and Barnes & Thornburg teams regarding case updates (0.4).	0.40	644.00
10/30/25	PT	Participate in planning call with Michael Robinson, the Barnes & Thornburg team, A. Popescu, A. Jaquet, L. Weber, R. Harrington, and R. Izakelian (.4).	0.40	778.00
10/31/25	BR4	Prepare for (.2) and attend call with the Quinn Emanuel team regarding case updates (0.4).	0.60	966.00
10/31/25	EM	Attend the telephone conference with P. Tomasco, R. Izakelian, and A. Jaquet in connection with case management and strategy (.4).	0.40	284.00
10/31/25	PT	Participate in an internal planning call with A. Jaquet, B. Roth, L. Weber, R. Harrington, and R. Izakelian (.4).	0.40	778.00
10/31/25	AJ4	Attend telephone conference with P. Tomasco, E. Moore, and L. Maseti in connection with case status and next steps (0.4).	0.40	644.00
10/31/25	NM7	Team conference meeting (0.4).	0.40	466.00
		SUBTOTAL	47.10	65,389.50

vii Claims Administration and Objections

10/01/25	PT	Review status of Temple Green claim objection and adversary complaint and examine facts and issues related to same (1.9).	1.90	3,695.50
10/02/25	AJ4	Correspond with C. Toppings and M. Robinson regarding the second omnibus claim objection (0.2).	0.20	322.00

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10/03/25	RH9	Implement comments to claim objection (.6).	0.60	789.00
10/03/25	PT	Review and coordinate the response to the special committee's comments to the second omnibus claim objection (.4).	0.40	778.00
10/05/25	RH9	Draft the post-trial brief for the Midas claim objection (2.5).	2.50	3,287.50
10/06/25	AJ4	Review and revise the memorandum regarding the claims and related objections (1.2); correspond with P. Tomasco regarding same (0.3).	1.50	2,415.00
10/06/25	RH9	Draft the post-trial brief for the Midas claim objection (2.3).	2.30	3,024.50
10/06/25	PT	Correspondence with R. Harrington regarding the Midas Green filing (.2); correspondence with A. Jaquet regarding Temple Green claim objection (.3); coordinate with V. O'Connell regarding the status of the claim objection (.2); correspondence with C. Topping regarding the objection to Temple Green's claim (.3); review and edit post-hearing brief and coordinate with R. Harrington and E. Brannen (.9).	1.90	3,695.50
10/07/25	AJ4	Correspond with G. Pusavat regarding the objection to Temple Green's claim (0.3).	0.30	483.00
10/07/25	AJ4	Correspond with R. Izakelian regarding the second omnibus objection regarding satisfied claims and other substantive grounds (0.2).	0.20	322.00
10/07/25	LMW	Emails with the Quinn Emanuel team re: Fairbairn claim objection (.4).	0.40	666.00
10/07/25	PT	Review and edit the post-hearing submission regarding Midas Green claim objection (.9).	0.90	1,750.50

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10/08/25	BR4	Emails regarding claim objections (0.4).	0.40	644.00
10/08/25	GSP	Review Proof of claim (0.5); prepare arguments for objections re same (1.0).	1.50	2,497.50
10/08/25	AJ4	Correspond with P. Tomasco and R. Izakelian regarding the finalization of the second omnibus objection regarding satisfied claims and other non-substantive claims (0.4).	0.40	644.00
10/08/25	PT	Review, analyze and comment on the Barnes & Thornburg/Akin Gump changes to the Transcend claim objection (1.2); review and revise the revised motions for sanctions against Midas Green (.3); correspondence with C. Topping regarding revisions to Transcend claim objections (.2); correspond with C. Underwood regarding the filing deadlines for filing the objections to claim and limitation on the revisions (.7); review and revise the post-hearing brief on the Midas claims and coordinate filing of same (.9); multiple correspondence with T. Schmeltz regarding proposed changes to objection to claims and need for preservation (1.1).	4.40	8,558.00
10/08/25	BH2	Finalize (.9) and file the Motion for Sanctions against Midas Green (.3); work with attorneys to finalize the post-hearing brief in support of the objection to claims filed by Midas Green (1.2) and file same (.3).	2.70	1,768.50
10/09/25	NM7	Review the second group claim objection (0.6).	0.60	699.00
10/09/25	RH9	Proof and finalize the claim objection (.8).	0.80	1,052.00

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10/09/25	AJ4	Finalize (9.0) and coordinate the filing of the second omnibus objection regarding satisfied claims and other substantive grounds (.3).	9.30	14,973.00
10/09/25	PT	Participate in a discussion regarding the claim objection with A. Jaquet, T. Schmeltz, E. Eaton, S. Wells, C. Underwood, C. Blackmon, M. Robinson, R. Izakelian, R. Harrington, C. Topping, M. Soule (.9); participate in secondary discussion re Claim Objection with C. Topping, A. Jaquet, M. Soule, C. Blackmon (.4); follow up conference with T. Schmeltz regarding additional edits to statute of limitations and dictate additional edits to claim objection (.5); coordinate finalization, filing and service of second omnibus claim objection (.3).	2.10	4,084.50
10/09/25	BH2	Work with attorneys to finalize (4.4) and file the omnibus claim objection (.4).	4.80	3,144.00
10/14/25	RH9	Revise sanctions motion (1.5); draft order (.2).	1.70	2,235.50
10/14/25	PT	Review, revise, and coordinate filing of revised motions for sanctions against Temple Green (.3).	0.30	583.50
10/27/25	BR4	Research and emails regarding claim objection (1.3).	1.30	2,093.00
10/28/25	BR4	Call with Moore regarding claim objection research (0.2).	0.20	322.00
10/28/25	EM	Prepare memorandum re: breach of contract claims under the Temple Lease (1.4).	1.40	994.00
10/28/25	LMW	Prepare for and attend Cohn deposition (9.6).	9.60	15,984.00

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10/28/25	PT	Review and analysis of Midas Green orders on claim objection and withdrawal of the reference (.4); correspond with C. Topping and E. Brannen regarding next steps and analysis of appellate issues (.7).	1.10	2,139.50
10/28/25	BH2	Review the Memorandum Opinion and Order and the Report and Recommendation from the Court on the Midas Green claims (.6) and forward to the Client (.2).	0.80	524.00
10/29/25	EM	Prepare memorandum re: breach of contract claims arising under Temple lease (6.8).	6.80	4,828.00
10/30/25	BR4	Research on claim objections (1.0).	1.00	1,610.00
10/30/25	LMW	Attend 30(b)(6) deposition (6.5); emails to A. Jaquet re: same (.2); emails to Quinn Emanuel team re: privilege designations (.6).	7.30	12,154.50
10/31/25	EM	Prepare memorandum re: breach of contract claims under the Temple Lease (3.0).	3.00	2,130.00
		SUBTOTAL	74.60	104,891.00

viii Corporate Governance and board Matters

10/01/25	PT	Prepare for and attend Board meeting with C. Topping, Chase and Cameron Blackmon, R. Szkoda, J. Norr, D. Eaton, S. Wells (1.1).	1.10	2,139.50
10/08/25	LMW	Call with P. Tomasco re: case updates (.3); attend board call (.8); prepare summary of same (1.3).	2.40	3,996.00
10/16/25	PT	Research governance issues (.7).	0.70	1,361.50
		SUBTOTAL	4.20	7,497.00

x Employment and Fee Applications

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November 13, 2025 Matter #: 12875-00001
Page 16 Invoice Number: 101-0000199491

10/01/25	PT	Review and revise the fee application and twelfth monthly statement (.9).	0.90	1,750.50
10/01/25	BH2	Email communications with P. Tomasco regarding fee applications and monthly fee statements (.4).	0.40	262.00
10/02/25	PT	Coordinate updated retention agreement with K. Williams with C. Topping and M. Soule (.2).	0.20	389.00
10/02/25	PT	Prepare for and attend the hearing on Lehotsky Keller Cohn's fee application (1.).	1.00	1,945.00
10/07/25	PT	Review the application to retain a real estate broker to sell and manage Twins facility and related communications (.40).	0.40	778.00
10/10/25	BH2	Begin to prepare the September monthly fee statement (5.5).	5.50	3,602.50
10/14/25	PT	Review the Keller Williams retention application (.4).	0.40	778.00
10/15/25	PT	Incorporate C. Topping's comments to the retention of Keller Williams and coordinate filing of same (.4).	0.40	778.00
10/16/25	BH2	Revise the Application to Retain Keller Williams to incorporate P. Tomasco's comments (.7) and forward to P. Tomasco for her review (.1).	0.80	524.00
10/20/25	PT	Coordinate finalization of Keller Williams retention pleadings (.1).	0.10	194.50
10/20/25	BH2	Finalize the Application to Retain Keller Williams Realty and the proposed order to incorporate the comments of P. Tomasco (.7); file same (.3).	1.00	655.00
10/21/25	PT	Detailed response to inquiry from S. Schultz regarding selection of real estate broker (.4).	0.40	778.00

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10/27/25	PT	Coordinate fee applications and requests with B. Howell (.6).	0.60	1,167.00
10/27/25	BH2	Review Transcend's Objection to Quinn Emanuel's Third Interim Fee Application (.4).	0.40	262.00
10/28/25	BH2	Draft a Notice of Hearing re Quinn Emanuel's Third Interim Fee Application (.6) and file same (.3).	0.90	589.50
10/29/25	AJ4	Attend depositions of D. Eaton and C. Toppings in relation to Lehotsky Keller Cohn's fee dispute (2.0).	2.00	3,220.00
10/29/25	BH2	Draft Quinn Emanuel's Thirteenth Monthly Fee Statement (1.5) and file same (.3); revise the Monthly Fee Statement of Stris & Maher (.2); and file the Monthly Statement and Stris's quarterly fee application (.3).	2.30	1,506.50
10/30/25	BH2	File Barnes & Thornburg's Monthly Fee Statement (.3); serve Quinn Emanuel's monthly fee statement to the parties listed on the Interim Compensation Order (.2).	0.50	327.50
		SUBTOTAL	18.20	19,507.00

xii Litigation

10/06/25	PT	Review special committee filing and outline of issues needing correction (.2).	0.20	389.00
10/13/25	PT	Review the cross notice of deposition by Lehotsky Keller Cohn (.2); coordinate draft motion to quash with A. Jaquet (.1); review and extensive revisions to the motion to quash (1.2); telephone conference with T. Schmeltz regarding the deposition notice (.2); finalize and coordinate the filing of the motion to quash deposition cross notice (.6);	2.40	4,668.00

		review and comment on the proposed clean-up bid for Twins site (.1).		
10/25/25	PT	Prepare for and attend deposition preparation for C. Topping and C. Wheeler (1.4).	1.40	2,723.00
10/27/25	PT	Coordinate deposition coverage and issues with L. Weber in Lehotsky Cohn Keller dispute (.2); correspond with T. Schmeltz regarding discovery clawbacks (.5); correspond with P. Lohse regarding privileged communications (.3).	1.00	1,945.00
10/29/25	AJ4	Research 11 U.S.C. 502(d) and correspond with P. Tomasco in connection with the same (0.6).	0.60	966.00
10/30/25	PT	Initial deposition preparation with Michael Robinson, A. Popescu, L. Weber (4.9).	4.90	9,530.50
10/30/25	PT	Attend hearing on Emergency Motion of Special Committee Entry of Protective Order and Special Committee Emergency Motion to Seal and update P. Mandarino regarding status of testimony (.6).	0.60	1,167.00
		SUBTOTAL	11.10	21,388.50

xiii Non-working Travel

10/15/25	LMW	Travel to Houston for the disclosure statement hearing (2.8).	2.80	4,662.00
10/16/25	LMW	Travel from Houston to New York for the hearing on the disclosure statement (3.1).	3.60	5,994.00
10/31/25	PT	Travel to Houston (3.0).	3.00	5,835.00
		SUBTOTAL	9.40	16,491.00

xiv Plan and Disclosure Statement

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10/01/25	LMW	Prepare updates to the disclosure motion (1.3).	1.30	2,164.50
10/01/25	PT	Compile data for email to S. Lockhart and M. Moore and draft email explaining data and relevance to tax allocation process (.9); coordinate with associate team to draft discovery related to potential dispute (.1); follow up email with S. Lockhart and M. Moore (.2).	1.20	2,334.00
10/02/25	LMW	Emails with R. Izakelian re: updates to plan and disclosure statement (.3); review and revise motion re: approval of same (1.8).	2.10	3,496.50
10/02/25	BH2	Calendar deadlines and hearing dates announced during the October 2nd hearing re approval of the disclosure statement and confirmation (.4).	0.40	262.00
10/02/25	BR4	Emails regarding plan updates and case status (0.5).	0.50	805.00
10/03/25	LMW	Review and revise the plan and disclosure statement based on recent communications with settling parties (3.2).	3.20	5,328.00
10/03/25	PT	Update C. Topping and T. Schmeltz regarding negotiations with Riot regarding tax allocation (.1).	0.10	194.50
10/06/25	AJ4	Correspond with B. Roth regarding the plan and the plan support agreement (0.2); review related documents (0.2).	0.40	644.00
10/06/25	LMW	Review and revise the disclosure statement motion for approval (3.1); calls with R. Izakelian and B. Roth re: same (.7).	3.80	6,327.00
10/06/25	BR4	Review and revise the solicitation procedures motion and materials (6.0); emails regarding same (0.1).	6.10	9,821.00

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10/06/25	PT	Review and analyze the plan support agreement and analysis of potential issues (1.6).	1.60	3,112.00
10/06/25	RI	Review and revise the disclosure statement and motion to approve the disclosure statement (2.7).	2.70	4,495.50
10/07/25	LMW	Review the updated plan and disclosure statement terms (1.2).	1.20	1,998.00
10/07/25	PT	Participate in a conference call with C. Underwood, K. Kansa, T. Schmeltz, D. Eaton, S. Wells, M. Robinson, D. Dunn, S. Schultz, M. Hurley to discuss the plan and disclosure statement (.8); review and analyze the plan term sheet and plan with comments on same to drafting team (1.1); multiple emails regarding plan support agreement tasks, updating schedules and other implementation items needed and coordination of same (2.1); inquiries regarding status of plan and disclosure statement (.2); coordinate finalization and filing of plan, disclosure statement and solicitation motion and multiple reviews and edits to same (2.9).	7.10	13,809.50
10/07/25	BH2	Work with attorneys to finalize the amended plan, disclosure statement, and emergency motion (6.8); file the amended plan, disclosure statement, and emergency motion (.6).	7.40	4,847.00
10/08/25	BR4	Emails regarding the plan and disclosure statement (1.2); review same (0.2).	1.40	2,254.00
10/08/25	PT	Review and analyze Transcend's proposed discovery related to the joint plan of liquidation (.3); correspondence regarding dates for depositions (.2); review and comment	0.90	1,750.50

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		on proposal to amend schedules regarding SAFE claims (.4).		
10/09/25	PT	Prepare for and attend discovery conference with J. Echols, C. Potter, J. Iacuone, G. McAllister, J. Shepherd, A. Richardson, J. Okifor, M. Hurley, R. Shannon, T. Schmeltz, C. Underwood, S. Schultz, R. Mates, S. Lemmon, K. Lee, M. Fox, T. Fleming, C. Kunz, J. Brookner, A. Carson, B. Funk, C. Gibbs (.9); follow up conference with E. Winston regarding proposed deposition (.2); review and comment on proposed confirmation discovery plan (.2); review proposed schedule revisions and comment to A. Popescu regarding same (.6).	1.90	3,695.50
10/11/25	PT	Conference with T. Schmeltz regarding plan discovery (.1); conference with D. Eaton regarding plan discovery (.3); correspondence with C. Potter regarding deposition scheduling (.2).	0.60	1,167.00
10/13/25	LMW	Legal research re: depositions involving privilege (3.3); emails to A. Jaquet re: same (.3).	3.60	5,994.00
10/13/25	AJ4	Prepare motion to quash regarding notices of deposition of P. Tomasco (5.5); correspond with P. Tomasco and R. Izakelian regarding the same (0.2).	5.70	9,177.00
10/13/25	BH2	Finalize (.4) and file the Emergency Motion to Quash the Notice of Deposition of Patricia B. Tomasco (.3).	0.70	458.50
10/14/25	PT	Coordinate drafting and filing of the witness list and revisions to same for conditional approval hearing (.4); review and analysis of the objection to the conditional disclosure statement (.4); review and revise the	5.60	10,892.00

quinn emanuel trial lawyers

November 13, 2025
Page 22

Matter #: 12875-00001
Invoice Number: 101-0000199491

		disclosure statement to address additional information needs and circulate to drafting team (2.2); coordinate additional meet and confer with C. Potter and other plan proponents (.2); review and revise the objection to the motion to compel and email explaining changes (.9); coordinate additional changes to the disclosure statement and additions to reflect new information (.4); review and additional corrections to the updated disclosure statement and circulate to plan proponents (.8); telephone conference with M. Robinson regarding additional delay requests (.3).		
10/14/25	PT	Participate in a discovery call with C. Potter, N. Allard, R. Mates, M. Hurley, T. Schmeltz, R.J. Shannon, S. Schultz, C. Underwood (.5).	0.50	972.50
10/14/25	PT	Participate in hearing strategy call with S. Schultz, T. Schmeltz, K. Matsoukas, M. Hurley and follow up email summarizing allocation of arguments (.7).	0.70	1,361.50
10/14/25	LMW	Review and revise the disclosure statement for amended plan (3.7); emails to Quinn Emanuel team re: same (.2); prepare schedule re: LTIP claims (.6).	4.50	7,492.50
10/14/25	BH2	Draft a Notice of Hearing for the Emergency Motion to Quash the Deposition of Patricia Tomasco (.5) and file same (.3); draft a witness and exhibit list for the October 15th hearing (.4) and file same (.3); work with attorneys to prepare for the October 15th hearing (5.0).	6.50	4,257.50
10/15/25	LMW	Attend hearing on the plan discovery (.5); review and revise same (2.6).	3.10	5,161.50

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10/15/25	RI	Conference with Quinn Emanuel team regarding the plan (0.5); conference with Quinn Emanuel, Akin, and Barnes & Thornburg teams regarding the plan (0.5); conference with Quinn Emanuel, Akin, and Barnes teams and C. Potter regarding the plan (0.4).	1.40	2,331.00
10/15/25	PT	Update correspondence with the company regarding the status of negotiations with Whinstone and the proposed plan regarding same (.5).	0.50	972.50
10/15/25	BH2	Attend the 4:30 p.M. Hearing regarding discovery matters, deadlines, and confirmation deadlines (.5).	0.50	327.50
10/15/25	PT	Discovery conference with S. Lemmon and C. Potter (.6); multiple revisions and redlines of plan and disclosure statement and circulate updated documents; (.4); prepare for (.6) and attend hearing on emergency motions (plan discovery) (.5); follow up revisions to the disclosure statement order and solicitation materials and circulate updated documents to plan support parties (.8); correspondence with T. Laws regarding reset confirmation hearing (.1); review and comment on additions to liquidation analysis to show severance figures (.3).	3.30	6,418.50
10/15/25	PT	Participate in plan discovery and coordination call with T. Schmeltz, S. Schultz, R. Izakelian, K. Kansa, and C. Underwood (.7).	0.70	1,361.50
10/15/25	PT	Participate in call to finalize discovery plan with J. Echols, C. Potter, N. Allard, R. Mates, M. Hurley, T. Schmeltz, R.J. Shannon, S.	0.60	1,167.00

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		Schultz, C. Underwood, S. Lemmon, K. Lee, E. Winston (.6).		
10/16/25	BR4	Respond to emails regarding the plan (0.6).	0.60	966.00
10/16/25	PT	Participate in planning and strategy call with C. Underwood, D. Dunn, K. Matsoukas, T. Schmeltz, K. Kansa, M. Robinson, C. Topping, S. Wells, D. Eaton (.5); locate word version of Conn's plan to use for release language and correspond regarding release language (.3).	0.80	1,556.00
10/16/25	RI	Conference with Quinn Emanuel team regarding the plan (0.8); review and revise the disclosure statement and liquidation analysis (1.4).	2.20	3,663.00
10/17/25	LMW	Review and revise the edits to the plan and disclosure statement (4.1); emails to Barnes & Thornburg re: same (.3).	4.40	7,326.00
10/17/25	BR4	Call with the Quinn Emanuel team regarding the plan (0.2); call with L. Weber regarding same (0.2).	0.40	644.00
10/19/25	RI	Review and revise the disclosure statement and plan (1.8).	1.80	2,997.00
10/19/25	BH2	Work with attorneys to finalize and file the revised plan and disclosure statement (2.).	2.00	1,310.00
10/20/25	PT	Participate in call re hearing preparation with K. Kansa, T. Schmeltz, M. Robinson, and S. Schultz (.3); prepare for continued hearing on disclosure statement and review updated redlines compared to filed objections (1.6); prosecute hearing on approval of disclosure statement (.5); coordinate notices of redlines (.6).	3.00	5,835.00

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10/20/25	RI	Conference with Quinn Emanuel team regarding the plan (0.7); conference with Quinn Emanuel, Barnes & Thornburg, and Akin teams regarding the plan (0.3); review and revise the solicitation materials (4.3).	5.30	8,824.50
10/20/25	BR4	Attend the virtual disclosure statement hearing (0.4).	0.40	644.00
10/20/25	BH2	Work with attorneys to revise the proposed order approving the disclosure statement (filed twice) and the amended disclosure statement (11.1); file all documents (.6).	11.70	7,663.50
10/21/25	PT	Correspond with A. Popescu regarding nonvoting status for claim pending objection (.2); review status of solicitation package mail-out tasks. (.4).	0.60	1,167.00
10/21/25	BR4	Draft disclosure exhibits (0.8).	0.80	1,288.00
10/21/25	BH2	Work with attorneys to prepare the solicitation package to send to Veritas (2.6).	2.60	1,703.00
10/21/25	RI	Conference with the Quinn Emanuel team regarding the plan (0.5); review and revise the plan and disclosure statement (3.4).	3.90	6,493.50
10/22/25	PT	Review the final solicitation version of the plan and disclosure statement and correspondence regarding additional changes (1.4).	1.40	2,723.00
10/22/25	BH2	Work with attorneys to prepare the solicitation versions of the plan and disclosure statement for service (2.1).	2.10	1,375.50
10/23/25	PT	Correspondence regarding various solicitation package inquiries (.6).	0.60	1,167.00
10/24/25	PT	Review prior confirmation testimony in preparation for witness preparation tasks (.8).	0.80	1,556.00

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10/27/25	PT	Prepare for and participate in a call regarding plan exhibits with S. Schultz, L. Weber (.4); outline topics for witness preparation and research outlines and transcripts (2.4).	2.80	5,446.00
10/27/25	AJ4	Prepare outline for preparation of M. Robinson' deposition in connection with plan confirmation (7.4).	7.40	11,914.00
10/28/25	AJ4	Review and revise the draft outline for the preparation of M. Robison in connection with plan confirmation (7.8).	7.80	12,558.00
10/28/25	PT	Review and analysis of proposed 30(b)(6) topics and division between the special committee and the Debtor (.5); correspondence with the Barnes & Thornburg team regarding same (.3); correspond with A. Jaquet and L. Weber regarding witness preparation outlines and meetings (.2).	1.00	1,945.00
10/29/25	AJ4	Research application of privilege in connection with discovery (1.1); correspond with P. Tomasco in connection with the same (0.1).	1.20	1,932.00
10/29/25	LMW	Attend 30(b)(6) deposition (6.5); emails to A. Jaquet re: same (.2); emails to Quinn Emanuel team re: privilege designations (.6).	7.30	12,154.50
10/29/25	PT	Prepare for and participate in a call regarding the Plan severance exhibit with S. Schultz, L. Weber (.4); draft proposed email to C. Potter and circulate to Barnes team (.6); review plan materials in preparation for discovery responses (2.6); review draft preparation outline and correspond with M. Robinson and A. Popescu regarding same (.7); finalize email to C. Potter regarding 30(b)(6) topics (.2).	4.50	8,752.50

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10/29/25	AJ4	Review and revise the draft outline for the deposition preparation of M. Robinson (5.9); correspond with P. Tomasco regarding same (0.2).	6.10	9,821.00
10/30/25	AJ4	Prepare for and attend the preparation of M. Robinson in connection with Debtors' 30(b)(6) deposition (2.7).	2.70	4,347.00
10/31/25	LMW	Review of emails re: plan updates (.3); emails to E. Moore re: confirmation brief (.5); review and revise same (1.3).	2.10	3,496.50
10/31/25	PT	Correspondence with C. Potter and plan support parties regarding discovery (.2); review requests for production and coordinate analysis and completion of same (.5).	0.70	1,361.50
10/31/25	AJ4	Prepare a memorandum regarding requests from Transcend Group (0.8); correspond with P. Tomasco regarding the same (0.1).	0.90	1,449.00
		SUBTOTAL	171.70	260,929.50

Fee Summary

Attorneys	Init.	Title	Hours	Rate	Amount
Patty Tomasco	PT	Partner	91.70	1,945.00	178,356.50
Razmig Izakelian	RI	Associate	22.40	1,665.00	37,296.00
Lindsay M. Weber	LMW	Associate	76.60	1,665.00	127,539.00
Grace Pusavat	GSP	Associate	1.50	1,665.00	2,497.50
Ben Roth	BR4	Associate	18.90	1,610.00	30,429.00
Alain Jaquet	AJ4	Associate	52.50	1,610.00	84,525.00
Rachel Harrington	RH9	Associate	7.90	1,315.00	10,388.50
Nqulelwa Maseti	NM7	Associate	5.40	1,165.00	6,291.00
Emily Moore	EM	Law Clerk	11.60	710.00	8,236.00

Case Assistants	Init.	Title	Hours	Rate	Amount
Barbara J Howell	BH2	Paralegal	70.70	655.00	46,308.50

quinn emanuel trial lawyers

November 13, 2025 Matter #: 12875-00001
Page 28 Invoice Number: 101-0000199491

Expense Summary

Description		Amount
Express mail		44.61
Filing fee(s)		136.00
Hearing transcript(s)		321.90
Online Research	(based on standard Westlaw or Lexis, without any applicable discount)	0.00
Local business travel		92.41
Document Reproduction	0.10	4.40
Word processing		0.00
Hotel		1,646.52
Courier		15.68
Velobind		3.03
Out-of-Town Travel		250.53
Air travel		611.96
PACER Services		0.00
Document Services		270.08
Tabs		3.75

Litigation Support Costs

RelOne User Fee		0.00
RelOne Repository Hosting (Per GB)		1,479.14
RelOne Active Hosting (Per GB)		4,305.29
	Total Expenses	$9,185.30

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865 S. Figueroa Street, 10th Floor
Los Angeles, California 90017

December 16, 2025

Cameron Blackmon
Rhodium Enterprises, Inc.
4146 W US Highway 79
Rockdale, TX 76567

Matter #: 12875-00001
Invoice Number: 101-0000201437
Responsible Attorney: Patty Tomasco

Rhodium- restructure of company

For Professional Services through November 30, 2025 in connection with a potential restructuring of this crypto mining company.

Fees	$583,610.00
Expenses	$8,329.22
Net Amount	$591,939.22
Total Due This Invoice	$591,939.22
Balance Due from Previous Statement(s)	$1,154,989.60
Total Balance Due	$1,746,928.82

Confidential – May include attorney-client privileged and work-product information

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December 16, 2025 Matter #: 12875-00001
Page 2 Invoice Number: 101-0000201437

Statement Detail

i Asset Analysis and Recover

11/20/25	AJ4	Correspond with A. Jonson et al. Regarding payment relating to settlement with Three Way (0.2).	0.20	322.00
11/21/25	PT	Coordinate return of arbitration deposit with W. Thompson (.2).	0.20	389.00
11/26/25	BH2	Incorporate the changes to the Declaration of Chris Wheeler re enforce the sales agreement with Whinstone (.3) and forward to P. Tomasco (.1).	0.40	262.00
		SUBTOTAL	0.80	973.00

ii Asset Disposition

11/05/25	BH2	Begin to draft a Notice regarding the sale of de minimis assets (.9); email communications with Province to obtain additional information (.4).	1.30	851.50
11/10/25	PT	Correspondence and conference with C. Blackmon and C. Topping regarding miner transactions and process for approval of same (.5).	0.50	972.50
11/19/25	PT	Coordinate certificate of no objection on motion to enforce sale order (.3).	0.30	583.50
11/20/25	BH2	Draft a Notice of Hearing for the Motion to Enforce the Purchase and Sale Agreement with Whinstone (.6) and file same (.3).	0.90	589.50
11/25/25	PT	Draft C. Wheeler declaration to address Court's concern regarding motion to enforce sale agreement (.9); correspondence with C. Wheeler to review declaration (.3); review and further revision of declaration in light of comments (.5); correspond with	1.90	3,695.50

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		Barnes & Thornburg team to review C. Wheeler declaration (.2).		
11/25/25	PT	Prepare for (.8) and attend the hearing on Motion to Enforce the Purchase and Sale Agreement with Whinstone (.3).	1.10	2,139.50
11/25/25	BH2	Review and revise the Declaration of Chris Wheeler (.4).	0.40	262.00
		SUBTOTAL	6.40	9,094.00

ix Employee Benefits and Pensions

11/02/25	PT	Correspondence with UHC regarding continuation of health care plan (.2) and follow up with C. Topping and A. Catatao regarding wind down of health care plan (.2).	0.40	778.00
11/06/25	PT	Correspondence with C. Topping regarding status of employee benefits contract and timing of termination of same (.3).	0.30	583.50
11/07/25	PT	Prepare for (.2) and participate in call to discuss benefits termination strategy and planning with C. Topping, L. Weber, A. Catatao (.3).	0.50	972.50
		SUBTOTAL	1.20	2,334.00

v Business Operations

11/06/25	PT	Review and comment on fee application (.2); review status of fee requests (.4).	0.60	1,167.00
		SUBTOTAL	0.60	1,167.00

vi Case Administration

11/01/25	EM	Prepare for (.7) and attend telephone conference with P. Tomasco, R.	1.00	710.00

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		Izakelian, and A. Jaquet in connection with case management and strategy (.3).		
11/02/25	AJ4	Review recent docket filings (0.2).	0.20	322.00
11/03/25	EM	Prepare for (.1) and attend telephone conference with P. Tomasco, R. Izakelian, L. Weber, B. Roth, and A. Jaquet in connection with case management and strategy (.4).	0.50	355.00
11/03/25	BR4	Call with Quinn Emanuel team regarding case updates (0.4).	0.40	644.00
11/03/25	PT	Prepare for (.1) and participate in a call with L. Weber, R. Harrington, R. Izakelian, A. Jaquet, E. Moore to review project status and strategy (.4).	0.50	972.50
11/03/25	BH2	Review Pacer docket (.4) and download filed pleadings prior to the 2:00 pm hearing for attorneys' review (.6).	1.00	655.00
11/03/25	RI	Prepare for (.1) and conference with Quinn Emanuel team regarding case strategy and assignments (0.4).	0.50	832.50
11/04/25	AJ4	Prepare for (.5) and attend telephone conference with P. Tomasco, T. Schmeltz, et al. Regarding case status and next steps (0.3).	0.80	1,288.00
11/04/25	PT	Participate in a planning call with the Quinn Emanuel team (.3).	0.30	583.50
11/05/25	PT	Prepare for (.1) and participate in project coordination call with M. Robinson, A. Popescu, L. Weber, R. Harrington, R. Izakelian, A. Jaquet (.4).	0.50	972.50
11/06/25	AJ4	Prepare for (.1) and attend telephone conference with P. Tomasco, T. Schmeltz, and M. Hurley regarding case status and next steps (0.4).	0.50	805.00

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11/06/25	EM	Prepare requests for production in connection with case strategy (.8).	0.80	568.00
11/06/25	PT	Prepare for (.1) and participate in call with M. Robinson, A. Popescu, A. Jaquet, E. Moore to discuss projects and strategy (.4).	0.50	972.50
11/06/25	BR4	Call with Quinn Emanuel, Akin Gump, Province, and Barnes & Thornburg teams regarding case updates (0.4); emails regarding same (0.2).	0.60	966.00
11/06/25	AJ4	Prepare for (.1) and attend telephone conference with P. Tomasco, A. Popescu et al. Regarding case status and next steps (.4).	0.50	805.00
11/07/25	EM	Video conference with P. Tomasack, L. Maseti, R. Harrington, A. Jaquet in connection with case management and strategy (.4).	0.40	284.00
11/07/25	BH2	Review Pacer docket (.4) and update files to the current status (.6).	1.00	655.00
11/07/25	AJ4	Attend telephone conference with P. Tomasco, R. Harrington et al. Regarding case status and next steps (0.4).	0.40	644.00
11/07/25	AJ4	Prepare for (.2) and attend telephone conference with P. Tomasco, M. Robinson regarding case status and strategy (0.3).	0.50	805.00
11/07/25	PT	Prepare for (.1) and participate in planning call with L. Weber, R. Izakelian, A. Jaquet (.4).	0.50	972.50
11/10/25	AJ4	Prepare for (.1) and attend telephone conference with P. Tomasco, T. Schmeltz, et al. Regarding case status and next steps (0.3).	0.40	644.00
11/10/25	PT	Prepare for(.2) and participate in planning and coordination call with R. Izakelian, A. Jaquet, B. Roth (.3).	0.50	972.50

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11/11/25	AJ4	Prepare for (.1) and attend telephone conference with P. Tomasco, M. Hurley, et al. Regarding case strategy and next steps (0.3); prepare memorandum in connection with the same (0.1).	0.50	805.00
11/11/25	AJ4	Attend telephone conference with T. Schmeltz, P. Tomasco et al. Regarding case status and next steps (0.4).	0.40	644.00
11/12/25	AJ4	Prepare for (.2) and attend telephone conference with P. Tomasco, R. Izakelian et al. Regarding case status and next steps (0.3).	0.50	805.00
11/12/25	PT	Prepare for (.2) and participate in planning call with R. Harrington, R. Izakelian, A. Jaquet, B. Roth (.3).	0.50	972.50
11/12/25	BH2	Review Pacer docket (.7) and update files to the current status, calendaring deadlines and hearing dates (.7).	1.40	917.00
11/12/25	RI	Conference with Quinn Emanuel team regarding case strategy and assignments (0.3).	0.30	499.50
11/13/25	AJ4	Prepare for (.7) and attend telephone conference with P. Tomasco, L. Weber et al. Regarding case status and next steps (.5).	1.20	1,932.00
11/13/25	PT	Participate in a coordination call with L. Weber, R. Harrington, R. Izakelian, A. Jaquet (.5).	0.50	972.50
11/13/25	EM	Prepare for (.2) and attend video conference with P. Tomasco, A. Jaquet, L. Weber, R. Izakelian and C. Topping in connection with case strategy (.5).	0.70	497.00
11/14/25	AJ4	Confer with P. Tomasco regarding case status and next steps (0.3).	0.30	483.00
11/18/25	PT	Coordination call with R. Harrington, R. Izakelian, A. Jaquet (.5).	0.50	972.50

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11/18/25	PT	Coordinate finalization of 3 Way settlement (.3).	0.30	583.50
11/19/25	RH9	Conference with Quinn Emanuel team to discuss confirmation planning and next steps (.5).	0.50	657.50
11/19/25	AJ4	Attend telephone conference with P. Tomasco et al. Regarding case status and next steps (0.5).	0.50	805.00
11/19/25	PT	Coordination call with R. Harrington, R. Izakelian, A. Jaquet (.5).	0.50	972.50
11/20/25	AJ4	Prepare for (.2) and attend telephone conference with P. Tomasco et al. Regarding case status and next steps (0.3).	0.50	805.00
11/20/25	PT	Prepare for (.2) and participate in team call to discuss work streams and strategy with R. Harrington, R. Izakelian, A. Jaquet (.3).	0.50	972.50
11/21/25	AJ4	Prepare for (.2) and attend telephone conference with P. Tomasco et al. Regarding case status and ongoing tasks (0.3).	0.50	805.00
11/21/25	PT	Prepare for (.2) and participate in team call to discuss work streams and strategy with R. Harrington, R. Izakelian, A. Jaquet (.3).	0.50	972.50
11/21/25	BH2	File the 19th Monthly Operating Reports on behalf of the Debtors (1.1); forward file-stamped copies to the Client (.3).	1.40	917.00
11/24/25	AJ4	Attend telephone conference with P. Tomasco et al. Regarding case status and strategy (0.5).	0.50	805.00
11/24/25	PT	Participate in team call to discuss work streams and strategy with R. Harrington, R. Izakelian, A. Jaquet (.5).	0.50	972.50
11/24/25	BH2	Review Pacer docket (.2) and update	0.50	327.50

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		files to the current status for attorneys' review (.3).		
11/24/25	RH9	Attend Quinn Emanuel team call to discuss assignments and next steps (.5).	0.50	657.50
11/24/25	BH2	Review Pacer docket (.3) and order transcripts missing from the files (in preparation of the confirmation hearing) (.4).	0.70	458.50
11/24/25	BR4	Call with Quinn Emanuel team regarding case updates (0.5).	0.50	805.00
11/25/25	AJ4	Attend telephone conference with P. Tomasco, R. Izakelian et al. Regarding case status and ongoing tasks (0.5).	0.50	805.00
11/25/25	PT	Participate in strategy call with R. Harrington, R. Izakelian, A. Jaquet, E. Moore (.5).	0.50	972.50
11/25/25	RH9	Attend Quinn Emanuel team call to discuss assignements and next steps (.5).	0.50	657.50
11/26/25	PT	Prepare for (.1) and participate in strategy call with R. Harrington, R. Izakelian, A. Jaquet, E. Moore (.4).	0.50	972.50
11/26/25	BH2	Review Pacer docket (.3) and update files for attorneys' review (.4).	0.70	458.50
11/30/25	RH9	Attend Quinn Emanuel team call to discuss assignments and next steps (.5).	0.50	657.50
		SUBTOTAL	30.70	41,968.50

vii Claims Administration and Objections

11/01/25	PT	Review Transcend requests for production and formulate task list for responding between Debtors and Special Committee (.7); email A. Jaquet, R. Izakelian regarding	3.60	7,002.00

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		proposed outline drafting formal responses to document requests and 30(b)(6) topics (.3); correspond with Province team regarding document retrieval tasks and proposal for responding and document retrieval (.6); update Quinn Emanuel team on research regarding privilege (.2); update Barnes team regarding prior document production and minimizing duplication (.2); further follow up regarding SAFE correspondence to respond to document requests (.2); participate in Quinn Emanuel call regarding the request for production of documents responses and document gathering tasks (.3); prepare for and participate in conference call with Transcend counsel and plan proponent counsel regarding discovery plan to respond to Transcend document and discovery requests (.9); revise document pull chart and share with Barnes team (.2).		
11/01/25	AJ4	Prepare for and attend telephone conference with P. Tomasco, R. Izakelian and E. Moore regarding Transcend Group's document requests (1.0); prepare for and attend telephone conference with C. Potter, T. Schmeltz, P. Tomasco et al. Regarding Transcend Group's 30(b)(6) deposition and document requests (0.7).	1.70	2,737.00
11/01/25	RI	Conference with Quinn Emanuel team regarding Transcend discovery (1.0); conference with counsel for the Transcend group, Special Committee, and SAFE AHG regarding discovery (0.5).	1.50	2,497.50
11/02/25	BR4	Research on claims questions (1.4);	2.00	3,220.00

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		review and revise draft on same (0.6).		
11/03/25	EM	Review and revise memorandum re: breach of contract claims under the Temple lease (3.8).	3.80	2,698.00
11/03/25	BR4	Research on claim objections and waiver of defenses (1.8); call with E. Moore regarding same (0.4); emails regarding same (0.3).	2.50	4,025.00
11/03/25	PT	Review and comment on proposed objections to 30(b)(6) topics (.3); correspondence with E. Mortensen regarding treatment of SAFE claims under plan (.1); correspond with D. Eaton regarding preparation outline and relevant documents (.3).	0.70	1,361.50
11/03/25	PT	Follow up on 3 Way demand negotiation (.1).	0.10	194.50
11/03/25	PT	Correspondence with E. Brannen and C. Topping regarding settlement overture from Midas Green counsel (.2).	0.20	389.00
11/04/25	EM	Prepare a memorandum re: breach of contract claim (2.2).	2.20	1,562.00
11/04/25	PT	Prepare for and participate in call with SAFE committee regarding topics for Debtors, Special Committee, and Imperium corporate representative depositions (.9); coordinate a draft of the objection to 30(b)(6) topics with R. Izakelian (.2); coordinate meet and confer with C. Potter (.1); review and revise objections to 30(b)(6) topics (.4).	1.60	3,112.00
11/04/25	BR4	Review and revise claim objection research (1.7).	1.70	2,737.00
11/04/25	AJ4	Review and revise draft outline for M. Robinson's 30(b)(6) deposition preparation (2.0); prepare for and attend telephone conference with P.	2.50	4,025.00

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		Tomasco, M. Hurley et al. Regarding 30(b)(6) deposition preparation (0.5).		
11/04/25	RI	Conference with Quinn Emanuel, Barnes and Province teams regarding discovery (0.5); prepare objections to Rule 30(b)(6) notice (0.7).	1.20	1,998.00
11/04/25	PT	Correspond with E. Brannen regarding bankruptcy appellate procedure (.2); correspond with C. Potter regarding request for extension of deadline to respond to claim objection and coordinate with teams (.5); review and analysis of opposition briefs to sanctions motion and correspond with E. Brannen regarding same (.9).	1.60	3,112.00
11/05/25	AJ4	Attend 30(b)(6) deposition preparation of D. Eaton and M. Robinson (1.10); review and revise preparation outline regarding M. Robinson (0.8), confer with P. Tomasco regarding same (0.2); correspond with R. Izakelian regarding same (0.1).	2.10	3,381.00
11/05/25	AJ4	Review and revise requests for production in relation to the second omnibus objection to satisfied claims and other substantive grounds (1.2); correspond with E. Moore regarding same (0.2).	1.40	2,254.00
11/05/25	AJ4	Correspond with C. Toppings regarding claims against Three Way (0.1); correspond with B. Ay et al. Regarding potential settlement (0.2); confer with A. Popescu regarding same (0.2).	0.50	805.00
11/05/25	EM	Review and revise memorandum re: breach of contract claims (1.0).	1.00	710.00
11/05/25	PT	Prepare for and participate in strategy call with the Special	2.70	5,251.50

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December 16, 2025
Page 12

Matter #: 12875-00001
Invoice Number: 101-0000201437

		Committee the Imperium Corporate representatives, S. Schultz, M. Hurley, T. Schmeltz, C. Underwood (.9); review and revise objection to 30(b)(6) topics with T. Schmeltz (.4); meet and confer with C. Potter, T. Schmeltz, M. Hurley and others regarding 30(b)(6) topics (.9); comment on preparation outlines for Robinson and Eaton with added documents (.3); finalize and transmit objections to 30(b)(6) topics to C. Potter (.2).		
11/05/25	BR4	Emails regarding upcoming depositions, claim objections, and case updates (0.6); call with E. Moore regarding research; (0.4); emails regarding same (0.2).	1.20	1,932.00
11/05/25	PT	Review and revise proposed requests for production of documents to Transcend parties regarding claim objection (.5); review and comment on counteroffer from 3 Way Logistics (.1); review and comment on offsetting invoices from 3 Way Logistics and correspondence with A. Popescu regarding same and comment on impossibility of deliveries to Rockdale after closure (.4).	1.00	1,945.00
11/06/25	AJ4	Correspond with R. Harrington and F. Sabzevari regarding Transcend's document requests (0.4); attend telephone conference with F. Sabzevani regarding same (0.2); correspond with E. Moore regarding finalization of the discovery requests to Transcend (0.2); confer with A. Popescu regarding Transcend's document requests (0.1); review and revise final version of discovery requests to Transcend (0.2);	1.60	2,576.00

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		correspond with C. Potter regarding requests for production (0.2); correspond with P. Tomasco regarding extension to Transcend (0.1); correspond with R. Izakelian regarding search terms for document search (0.2).		
11/06/25	AJ4	Review and revise the preparation outline for M. Robinson 30(b)(6) deposition (4.3).	4.30	6,923.00
11/06/25	AJ4	Correspond with C. Toppings regarding Three Way's settlement offer (0.2).	0.20	322.00
11/06/25	PT	Correspondence with M. Robinson regarding deposition scheduling (.2).	0.20	389.00
11/06/25	PT	Correspondence regarding discovery to Transcend parties regarding claim objection (.2); review and finalize discovery to Transcend parties (.5).	0.70	1,361.50
11/06/25	RH9	Gather documents related to omnibus objection (2.1); search produced discovery documents (.5); draft discovery requests for omnibus claim objection (.8).	3.40	4,471.00
11/07/25	AJ4	Review and revise the outline in relation to M. Robinson's 30(b)(6) preparation (3.4).	3.40	5,474.00
11/07/25	PT	Correspondence with L. Lim regarding claim payment (.2).	0.20	389.00
11/09/25	AJ4	Review correspondence from A. Popescu and P. Tomasco regarding M. Robinson's 30(b)(6) preparation (0.1).	0.10	161.00
11/10/25	AJ4	Correspond with R. Harrington regarding Transcend's requests for production (0.2).	0.20	322.00
11/10/25	AJ4	Correspond with M. Soule et al. Regarding Three Way proposed settlement (0.1).	0.10	161.00

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11/10/25	PT	Prepare for and participate in witness preparation with M. Robinson to review potential questions for deposition and testimony with follow up emails regarding potential fact issues (2.3).	2.30	4,473.50
11/10/25	AJ4	Prepare and attend preparation for M. Robinson's 30(b)(6) deposition (4.5); correspond with K. Matsoukas regarding preparation of D. Eaton (0.2); review memorandum regarding M. Robinson's 30(b)(6) preparation (0.3).	5.00	8,050.00
11/11/25	AJ4	Correspond with K. Matsoukas regarding preparation of D. Eaton (0.2); confer with P. Tomasco regarding deposition outline for Transcend Group (0.2); correspond with F. Sabzevari regarding document productions to Transcend (0.3); correspond with R. Harrington in connection with the same (0.4); correspond with R. Izakelian in connection with the same (0.1); prepare memorandum regarding M. Robinson's 30(b)(6) deposition (0.7); correspond and confer with P. Tomasco regarding Proof entities' proofs of claim (0.3); review and analyze documents in connection with Transcend's requests for production (2.0); correspond with Quinn Emanuel staff in connection with related document review (0.2).	4.40	7,084.00
11/11/25	AJ4	Prepare for and attend telephone conference with P. Tomasco, C. Toppings et al. Regarding settlement with Three Way (0.4); prepare settlement offer (0.3); correspond with P. Tomasco in connection with the same (0.1).	0.80	1,288.00
11/11/25	PT	Coordinate the document production	0.20	389.00

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		planning for response to Transcend discovery (.2).		
11/11/25	PT	Prepare for (.1) and participate in call with C. Underwood regarding Proof Capital refiled claims and plans to address (.3).	0.40	778.00
11/11/25	PT	Prepare for (.3) and participate in call with Alex Peloubet, M. Soule, C. Topping, M. Robinson, A. Popescu regarding Three Way settlement proposal, miner issues and other asset disposition matters (.3).	0.60	1,167.00
11/12/25	AJ4	Correspond and confer with R. Vasquez regarding preparation of document production in connection with Transcend's request for productions (0.2).	0.20	322.00
11/12/25	AJ4	Prepare outline for 30(b)(6) deposition of Transcend, including by reviewing prior docket filings, email correspondence and other related documents (7.2).	7.20	11,592.00
11/12/25	EM	Prepare motion for claim disallowance (.5).	0.50	355.00
11/13/25	AJ4	Prepare a memorandum regarding the certificate of no objection relating to the second omnibus objection (0.3); correspond with P. Tomasco regarding same (0.1).	0.40	644.00
11/13/25	AJ4	Correspond with P. Tomasco regarding settlement with Three Way (0.2).	0.20	322.00
11/13/25	AJ4	Review and revise draft outline for the 30(b)(6) deposition of the Fairbairn Group, including by reviewing proofs of claims and other materials (4.9).	4.90	7,889.00
11/13/25	PT	Coordinate response to Three Way settlement offer (.1).	0.10	194.50

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11/13/25	EM	Prepare motion for adversarial claim for breach of contract and claim disallowance (6.2).	6.20	4,402.00
11/13/25	PT	Prepare for and participate in Debtor pre-call with A. Popescu, T. Schmeltz, D. Dunn, M. Robinson, K. Kansa (.4); prepare for and participate in call re cash reconciliation file with A. Popescu, M. Hurley, T. Schmeltz, M. Robinson, S. Schultz (.7); correspondence with Quinn Emanuel Team regarding M. Hurley privilege statement (.2); coordinate deadline suspension given settlement negotiations and evaluate issues (.3); correspond with C. Potter regarding rescheduling of depositions and omnibus claim objection scheduling issues with multiple parties with potential continuances (1.1); correspondence with M. Robinson regarding deal points for Transcend Group settlement and markup of term sheet (.8); correspondence with QE team regarding work flow issues in light of settlement terms (.4).	3.90	7,585.50
11/14/25	PT	Prepare for and participate in call re Midas claim objection with C. Topping, C. Blackmon, S. Morgan, E. Brannen, M. Robinson (.5); correspondence with M. Robinson regarding Bell/Milam taxes (.2); correspondence with L. Weber regarding severance exhibit and C. VanZoeren negotiations (.1).	0.80	1,556.00
11/18/25	AJ4	Review settlement with Three Way (0.2); correspond with C. Toppings and M. Bonino regarding same (0.1).	0.30	483.00
11/18/25	AJ4	Review and revise the draft stipulation regarding Transcend Group; (0.4); prepare memorandum in connection with the same (0.4);	1.10	1,771.00

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		correspond and confer with P. Tomasco regarding same (0.2); review related correspondence between P. Tomasco and T. Schmeltz (0.1).		
		SUBTOTAL	90.70	139,844.00

viii Corporate Governance and board Matters

11/12/25	PT	Prepare for and attend Rhodium Board meeting (.7).	0.70	1,361.50
11/19/25	PT	Prepare for and participate in Rhodium Board meeting (.8).	0.80	1,556.00
		SUBTOTAL	1.50	2,917.50

x Employment and Fee Applications

11/04/25	BH2	Finalize (.5) and file Province's Fourth Interim Fee Application (.3); finalize Province's monthly fee statement (.2) and file same (.2).	1.20	786.00
11/04/25	BH2	Finalize (.4) and file Barnes & Thornburg's Fourth Interim Fee Statement (.3).	0.70	458.50
11/05/25	PT	Review the status of the Keller Williams retention application (.1).	0.10	194.50
11/06/25	BH2	Review the motions to withdraw filed by Transcend Group regarding Quinn Emanuel's monthly fee statement and its Third Interim Fee Application (.3) and draft a certificate of no objection to Quinn Emanuel's Third Interim Fee Application (.3); file same (.3); email communications with T. Laws regarding the November 12th hearing and the fact that the Transcend's objection had been withdrawn (.2).	1.10	720.50
11/12/25	BH2	Begin to prepare the October monthly	4.40	2,882.00

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		fee statement (4.4).		
11/12/25	BH2	Draft a certificate of no objection for the Keller Williams Retention Application (.3) and file the same (.3).	0.60	393.00
11/14/25	BH2	Continue to work on the Fourth Interim Fee Application (5.1); prepare the Fourteenth Monthly Fee Statement (2.1) and file same (.3).	7.50	4,912.50
11/18/25	BH2	Serve Quinn Emanuel's October monthly fee statement to the parties listed in the Interim Compensation Order (.3) and forward the LEDES data to the United States Trustee (.3).	0.60	393.00
11/19/25	BH2	Continue to prepare Quinn Emanuel's Fourth Interim Fee Application (2.1).	2.10	1,375.50
11/20/25	BH2	File Barnes & Thornburg's monthly fee statement (.3).	0.30	196.50
11/20/25	BH2	Continue to prepare the Fourth Interim Fee Application (3.6).	3.60	2,358.00
11/21/25	BH2	Finish draft of the Fourth Interim Fee Application (6.9) and forward same to P. Tomasco for review (.1).	7.00	4,585.00
11/21/25	BH2	File the Fourteenth Monthly Fee Statement on behalf of Province (.3).	0.30	196.50
11/25/25	BH2	Email exchange with V. O'Connell re Stris's Fourth Interim Fee Application (.3).	0.30	196.50
		SUBTOTAL	29.80	19,648.00

xii Litigation

11/02/25	EM	Review and revise discovery request in connection with legal strategy (.4).	0.40	284.00
11/03/25	PT	Attend hearing on fee application of Lehotsky Keller Cohn and hearing on motion to compel discovery request	6.30	12,253.50

		to SAFE AHG (6.3).		
11/04/25	EM	Review and revise the request for production in connection with case strategy (.5); prepare for a conference with P. Tomasco, A. Jaquet, R. Izakelian re: disclosures (1).	1.50	1,065.00
11/04/25	PT	Review status of document review for privileged materials to be clawed back from Lehotsky Keller Cohn production with P. Lohse (.4).	0.40	778.00
11/05/25	PT	Conference with J. Wolfshohl regarding Lehotsky Keller Cohn fee application (.4).	0.40	778.00
11/05/25	EM	Review and revise requests for production (1.2).	1.20	852.00
11/07/25	BR4	Calls and emails with R. Harrington regarding production details (0.8).	0.80	1,288.00
11/11/25	RH9	Review documents for production (1.8).	1.80	2,367.00
11/12/25	RV2	Prepare documents in the proper format to facilitate attorney review per request from A. Jaquet.	2.70	567.00
11/21/25	PT	Correspond with J. Wolfshohl regarding escrow amount (.5).	0.50	972.50
		SUBTOTAL	16.00	21,205.00

xiv Plan and Disclosure Statement

11/02/25	PT	Prepare for (.3) and participate in conference call with Province, special committee and Barnes teams regarding discovery responses and confirmation strategy (1.0).	1.30	2,528.50
11/04/25	PT	Prepare an agenda for confirmation coordination call with Barnes team (.5); prepare for and participate in confirmation planning call with Barnes and QE teams (.6); correspond	2.50	4,862.50

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		with A. Carson and R. Izakelian regarding plan release language (.5); review and analyze plan releases (.9).		
11/05/25	PT	Prepare for and participate in joint preparation session with T. Schmeltz and the Special Committee to map preparation and strategy for confirmation (1.1); correspondence regarding potential plan objections with M. Hurley (.3).	1.40	2,723.00
11/06/25	RH9	Conference with estate stakeholders regarding coordination of plan confirmation (.5).	0.50	657.50
11/06/25	PT	Prepare for (.4) and participate in confirmation coordination call with M. Hurley, T. Schmeltz, C. Underwood, K. Matsoukas, R. Izakelian, A. Jaquet, E, Moore (.4); follow up call with R. Izakelian, A. Jaquet regarding plan discovery tasks and strategy (.4); conference with C. Potter regarding plan objection (.2); follow up with T. Schmeltz regarding same (.1).	1.50	2,917.50
11/06/25	RI	Conference with Quinn Emanuel, Barnes & Thornburg, and Akin Gump teams regarding plan (0.4); conference with Quinn Emanuel, Province, and Barnes teams regarding discovery (0.4); conference with A. Popescu regarding plan discovery (0.5).	1.30	2,164.50
11/07/25	RH9	Add case law to the confirmation brief and address comments (5.5).	5.50	7,232.50
11/07/25	AJ4	Research gatekeeping injunctions and exculpations (0.5).	0.50	805.00
11/07/25	PT	Review examples of confirmation briefs to cull issues for expansion in confirmation briefing (.9); prepare for and participate in confirmation	5.00	9,725.00

quinn emanuel trial lawyers

December 16, 2025
Page 21

Matter #: 12875-00001
Invoice Number: 101-0000201437

		planning call with M. Robinson, K. Matsoukas, R. Izakelian (.7); review and revise the confirmation memorandum (2.3); forward summaries of recent 5th Circuit cases on plan provisions for incorporation into brief (.3); task list email to Barnes & Thornburg and Quinn Emanuel teams to address plan supplement and discovery responses (.8).		
11/09/25	RH9	Add case law to the confirmation brief and address comments (3.0).	3.00	3,945.00
11/10/25	RH9	Add caselaw to the confirmation brief and address comments (6.5).	6.50	8,547.50
11/10/25	RH9	Call with estate stakeholders regarding coordination of confirmation (.5).	0.50	657.50
11/10/25	PT	Prepare for and participate in call with special committee to plan for plan confirmation with M. Robinson, A. Popescu, C. Topping, R. Harrington, R. Izakelian, A. Jaquet (.8); review and revise proposed confirmation brief (.8); conference with D. Azman regarding proposed treatment of Proof Capital claims (.3).	1.90	3,695.50
11/11/25	RH9	Conference with estate stakeholders regarding coordination of confirmation (.3).	0.30	394.50
11/11/25	RH9	Implement comments and proof confirmation brief (2.5).	2.50	3,287.50
11/11/25	RI	Conference with Quinn Emanuel, Barnes & Thornburg, and Akin Gump teams regarding plan (0.3); conference with Quinn Emanuel and Barnes team regarding plan (0.3); conference with Quinn Emanuel team regarding plan (0.5).	1.10	1,831.50
11/11/25	PT	Prepare for and participate in plan coordination call with M. Hurley, T.	6.70	13,031.50

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		Schmeltz, C. Underwood, K. Matsoukas (.5); prepare for and participate in call to discuss confirmation hearing preparation tasks with M. Robinson, A. Popescu, C. Topping, R. Izakelian, A. Jaquet (.4); prepare for and participate in follow up call with special committee and counsel regarding plan settlement discussions and proposal to limit fees (.8); follow up conference with SAFE AHG counsel and special committee counsel regarding settlement proposals (.4); follow up research regarding confirmation requirements (.6); conference with M. Robinson regarding waterfall effects and settlement terms (.3); extensive revisions to confirmation brief to update and conform to district with additional research (3.4); email to do lists to plan proponent counsel (.3).		
11/12/25	PT	Prepare for and participate in call with T. Schmeltz, Special Committee, Province teams regarding negotiations with Transcend (.4); prepare for and participate in call re Transcend deal with S. Wells, M. Robinson, D. Eaton, and T. Schmeltz (.6); review and revise proposed stipulation with Transcend/SAFE and forward to the Special Committee (.4).	1.40	2,723.00
11/12/25	RI	Review and revise the confirmation brief (2.1).	2.10	3,496.50
11/12/25	PT	Prepare for and participate in strategy call with K. Kansa (.3); prepare for and participate in strategy call with A. Popescu, M. Robinson (.8); prepare for and participate in call with S. Schultz, T. Schmeltz, M. Hurley (.5); prepare for	4.50	8,752.50

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		and participate in follow up waterfall call with M. Hurley, S. Schultz, T. Schmeltz, M. Robinson (.8); prepare for and participate in call regarding plan settlement update with K. Kansa, T. Schmeltz (.4); conferences with M. Robinson regarding waterfall math and effects (.5); multiple review and revisions to confirmation brief (1.2).		
11/13/25	PT	Review and substantial revisions to confirmation brief (1.3); coordinate with Barnes & Thornburg team regarding additional revisions (.2); attention to confirmation deadline calendars (.1).	1.60	3,112.00
11/13/25	BR4	Emails regarding plan supplement (0.2).	0.20	322.00
11/13/25	RI	Conference with Quinn Emanuel team regarding plan (0.5).	0.50	832.50
11/14/25	PT	Prepare for and participate in call regarding potential Transcend settlement with T. Schmeltz, D. Eaton, S. Wells, M. Robinson, D. Dunn, K. Kansa (.9); follow up conference with M. Robinson regarding same (.3).	1.20	2,334.00
11/14/25	PT	Prepare for and participate in Debtors confirmation planning call with M. Robinson, A. Popescu, C. Topping, R. Izakelian, A. Jaquet (.9).	0.90	1,750.50
11/14/25	PT	Prepare for and participate in call regarding executory contracts schedule and plan supplement with L. Weber (.5).	0.50	972.50
11/16/25	PT	Prepare for and participate in confirmation planning call with L. Weber, R. Harrington, R. Izakelian, A. Jaquet (.5).	0.50	972.50
11/17/25	AJ4	Review correspondence from P.	0.20	322.00

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		Tomasco and K. Kansa regarding plan confirmation (0.2).		
11/17/25	PT	Participate in call regarding plan support agreement with L. Weber, M. Robinson, A. Popescu, K. Lee, C. Topping, M. Soule (.3); coordinate drafting plan supplement components with L. Weber and R. Izakelian (.2); update professional fee budgets with Stris and Province (.1); follow up with Barnes & Thornburg team regarding additions to confirmation brief (.1); multiple drafting, review and revisions to plan supplement documents and correspond with R. Izakelian and S. Schultz regarding same (3.7).	4.40	8,558.00
11/17/25	RH9	Draft executive contracts list incorporating edits from the company (2.8); draft plan administrator agreement (1.9).	4.70	6,180.50
11/17/25	RI	Conference with C. Topping, M. Soule, and Quinn Emanuel team regarding plan supplement (0.6); prepare plan supplement and exhibits (5.2).	5.80	9,657.00
11/18/25	RH9	Implement comments to the list of assumed contracts and create an exhibit for the plan supplement (3.2).	3.20	4,208.00
11/18/25	PT	Multiple revisions to plan supplement documents (2.9); coordinate additional changes with R. Izakelian regarding same (.2); review and respond to balloting inquiries from DLT (.1); review and respond to S. Schultz questions regarding assumed contracts list and coordinate with C. Topping regarding same (.9); review and suggest revisions to Transcend stipulation (.3); review and comment	10.50	20,422.50

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		on proposed documentation of Transcend stipulation under claim objection resolution and emails with D. Eaton and S. Wells regarding same (.5); summarize economic effect of dilutive warrants and overall impact on plan distributions (.8); coordinate with A. Jaquet regarding correct listing of Transcend parties from claim objection data (.2); retrieve examples of assumed contracts lists from liquidating plans to use as comparisons for negotiations with SAFE AHG (.5); additional changes to Transcend stipulation to reflect various holdings of different parties according to company books (1.1); follow up on additional changes to plan support agreement exhibit A (.2); telephone conference with C. Topping regarding same (.2); additional revisions to plan administrator agreement (.2); extensive revisions to confirmation brief draft and coordinate redline version of same (1.2); review status of plan declarations and coordinate drafting of declarations in support of plan (.1); detailed explanation of retained causes of action with respect to defenses to indemnification claims to K. Zaharis and follow on research to further respond to inquiry from S. Schultz (1.1).		
11/18/25	AJ4	Confer and correspond with P. Tomasco regarding M. Robinson and D. Eaton draft declarations in connection with the same (0.3); confer with A. Popescu regarding same (0.2); review related materials (0.5).	1.00	1,610.00
11/18/25	RI	Prepare plan supplement and exhibits (7.2).	7.20	11,988.00

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11/19/25	AJ4	Prepare a draft of M. Robinson's declaration on the liquidation analysis (4.0).	4.00	6,440.00
11/19/25	PT	Respond to inquiry from counsel for Ethos regarding claims and balloting under plan (.5); correspondence with R. Izakelian and S. Schultz regarding finalizing plan supplement (.2); respond to plan inquiry from L. Lim (.1); respond to multiple emails from S. Schultz regarding plan supplement documents and multiple revisions to plan supplement documents (1.7); respond to R. Szkoda inquiry regarding SAFE claim (.2); correspondence with T. Laws and S. Schultz regarding plan supplement (.2); coordinate notice of late filing plan supplement (.1); review and revise notice of late plan supplement (.2); circulate late notice to plan parties (.2); coordinate with plan parties to finalize plan supplement and coordinate service of plan supplement (.6).	4.00	7,780.00
11/19/25	BH2	Draft a Notice of Extended Deadline to file the Plan Supplement (.7) and file same (.3); work with attorneys to finalize and file the Plan Supplement (1.5).	2.50	1,637.50
11/19/25	RH9	Implement comments to plan supplement (1.0); finalize plan supplement (.6).	0.60	789.00
11/19/25	RI	Review and revise the plan supplement exhibits (1.0).	1.00	1,665.00
11/20/25	AJ4	Review and revise the draft of the M. Robinson declaration in support of the Plan (2.0); correspond with P. Tomasco regarding the same (0.1); correspond with A. Popescu regarding the same (0.2); review and	7.90	12,719.00

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		analyze settlement stipulation (1.2); prepare draft of D. Eaton's declaration(3.8); review memorandum on late filed claim and related materials and correspond with F. Sabzevari and A. Popescu regarding the same and plan (0.6).		
11/20/25	PT	Prepare and participate in call regarding Three Way settlement, Plan Administration Agreement, Wind-Down Budget with S. Schultz, R. Izakelian, M. Robinson (.5); review and revise the plan administrator agreement and coordinate redline of same (1.1); correspondence with M. Robinson regarding the plan administrator issues (.2); review and revise the Robinson declaration (.5); coordinate review by Province team (.1); review Transcend stipulation (.3).	2.70	5,251.50
11/21/25	PT	Coordinate preparation of exhibit list for confirmation hearing with B. Howell and S. Schultz (.1); coordinate ballot and voting inquiries with C. Topping and Verita team (.3); correspondence with A. Chiarello regarding claim amount (.2); coordinate with Verita and B. Funk to get ballots to Transcend group (.1); review VanZoeren proof of claim and correspond with C. Topping and S. Schultz regarding same (.2).	0.90	1,750.50
11/21/25	AJ4	Review and revise the draft of M. Robinson's declaration in support of plan confirmation, including by implementing A. Popescu's comments (2.8); correspond and confer with A. Popescu regarding same (0.1); review and revise the draft of D. Eaton's declaration in support of the plan (4.5).	7.40	11,914.00

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11/22/25	AJ4	Review and revise the draft of D. Eaton's declaration (2.5).	2.50	4,025.00
11/23/25	AJ4	Review and revise the draft of D. Eaton's declaration (2.0).	2.00	3,220.00
11/24/25	PT	Prepare for and participate in strategy call with P. Lohse, D. Eaton, S. Wells, C. Topping, M. Robinson, D. Dunn, T. Schmeltz, K. Kansa (1.1); correspond with S. Schultz regarding plan supplement components (.4); correspond with M. Robinson regarding missing elements for plan supplement (.3); correspond with plan proponents to coordinate missing items from plan supplement and issues with same (.7); review and revise the Eaton declaration (.9); forward draft to D. Eaton, K. Kansa for revision and completion (.2); correspond with plan support parties regarding timing of exhibits and declarations and internal deadlines for same (.3); correspond with K. Yang regarding fee issues and need to focus on plan confirmation (.5); further correspondence with S. Schultz regarding blown deadlines (.2); review status of plan supplement and declarations and review and revisions to plan documents (2.1).	6.70	13,031.50
11/24/25	AJ4	Review and revise the draft of D. Eaton's declaration (3.3); correspond with P. Tomasco regarding same (0.1).	3.40	5,474.00
11/24/25	AJ4	Prepare for and attend telephone conference with T. Schmeltz, P. Tomasco et al. Regarding case status and confirmation preparation (0.5).	0.50	805.00
11/24/25	RI	Prepare for (.3) and participate in a conference call with the Quinn Emanuel and Barnes & Thornburg	0.80	1,332.00

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		teams regarding the plan (0.5).		
11/25/25	RH9	Revisions to the response to plan objection (2.3).	2.30	3,024.50
11/25/25	PT	Prepare for and participate in Confirmation strategy call with M. Hurley, S. Schultz (.4); correspondence with C. Potter (.1); review confirmation brief draft and areas for completion (.8); correspondence with B. Funk regarding criticism of professionals (.2); correspondence regarding and review of Robinson declaration (.2); review and substantial revisions to reply to Lehotsky Keller Cohn's confirmation objection (1.6); coordinate changing cites to 5th Circuit and correspondence with R. Harrington regarding same (.2); online research for 5th Circuit cases on prudential standing by administrative claimants (.6); review and revise the Eaton declaration and correspondence with R. Izakelian regarding revisions (1.1); review and revise the confirmation brief and circulate (1.4); review effect of Transcend settlement on voting and disclosure issues and brief online research regarding same (.9).	7.50	14,587.50
11/25/25	AJ4	Review and revise the draft of D. Eaton's declaration (5.7).	5.70	9,177.00
11/25/25	RI	Review and revise the confirmation brief (5.3).	5.30	8,824.50
11/26/25	BR4	Call with the Quinn Emanuel team regarding confirmation planning (0.4); research regarding same (1.0).	1.40	2,254.00
11/26/25	AJ4	Review and revise the draft of M. Robinson's declaration (0.3); correspond with A. Popescu regarding the same (0.1); review and	5.20	8,372.00

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		revise draft of D. Eaton's declaration, including by analyzing related confirmation brief (4.8).		
11/26/25	PT	Prepare for and participate in coordination call with K. Kansa, R. Izakelian, A. Jaquet, L. Weber, S. Schultz, B. Funk, T. Schmeltz regarding confirmation hearing preparation and additional portions of plan supplement and plan supplement amendments (.9); follow up attention to voting tabulation issues with Transcend claims and research regarding same (.9); review and comment on Akin Gump's changes to confirmation brief (.7); further comment to Verita regarding voting reports (.2); review and comment on the Plan Administrator agreement (.1); finalize confirmation brief draft and circulate to plan parties (1.4); call with the Barnes & Thornburg team to discuss classification of Transcend claims in light of stipulation (.5); correspond with R. Izakelian regarding classification issues (.2); follow up with Verita regarding resolution of classification issue (.1); additional follow up with Verita to finalize ballot summary and coordinate finalization and filing same (.5); additional comments on the Plan Administrator agreement (.3).	5.80	11,281.00
11/26/25	BH2	Work with attorneys to finalize and file the notice of tabulation of votes and the Second Plan Supplement (1.7).	1.70	1,113.50
11/26/25	RI	Review and revise the confirmation brief (3.2); conference with Quinn Emanuel, Barnes & Thornburg, and Akin Gump teams regarding plan	5.90	9,823.50

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		documents (0.3); review and revise the plan supplement and voting report (2.4).		
11/28/25	AJ4	Attend the telephone conference with P. Tomasco, R. Izakelian et al. Regarding plan confirmation (0.5); review and revise the exhibit list (0.4); correspond with A. Popescu regarding M. Robinson's declaration (0.2); review and revise D. Eaton's declaration and correspond with D. Eaton and K. Pansa regarding the same (0.4).	1.50	2,415.00
11/28/25	EM	Video conference with P. Tomasco, R. Izakelian, A. Jaquet, and L. Weber in connection with plan confirmation (.4); begin to prepare the exhibit list for the confirmation hearing (4.6).	5.00	3,550.00
11/28/25	RI	Conference with Quinn Emanuel team regarding the plan (0.5); review and revise the plan and exhibit list (2.1).	2.60	4,329.00
11/29/25	AJ4	Review and revise the drafts of D. Eaton's declaration and confirmation brief (3.5); prepare for and attend telephone conference with P. Tomasco and R. Izakelian regarding same (0.4); correspond with S. Schultz regarding M. Robinson's declaration (0.2).	4.10	6,601.00
11/29/25	AJ4	Review and revise the exhibit list for the confirmation hearing (0.2).	0.20	322.00
11/29/25	PT	Prepare for and participate in plan preparation call with R. Harrington, R. Izakelian, A. Jaquet, E. Moore (.5); review updated confirmation order and revise (.4); review status of the exhibit list (.3); review and revise mediation privilege stipulation and respond to M. Hurley (.6); review and revise the exhibit and witness list (.6);	3.60	7,002.00

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		create task list and assignments list for plan proponents and deadlines for completion and correspondence with plan proponents regarding completion (1.2).		
11/29/25	EM	Conference with P. Tomasco re: confirmation (.4); conference with P. Tomasco, R. Izakelian, A. Jaquet, R. Harrington re: confirmation (.5).	0.90	639.00
11/30/25	AJ4	Review and revise D. Eaton's declaration (1.2); review and revise M. Robinson's declaration (0.2); review the brief memorandum (0.2); correspond and confer with R. Izakelian regarding same (0.2); prepare for and attend telephone conference with P. Tomasco, R. Izakelian et al. Regarding confirmation brief and related documents (0.4).	2.20	3,542.00
11/30/25	RI	Review and revise confirmation brief, order, and declarations (4.2).	4.20	6,993.00
11/30/25	PT	Prepare for and participate in call with R. Izakelian, K. Kansa, S. Schultz, T. Schmeltz regarding Monday filing deadlines and witness and exhibit list issues (.7); multiple review and revisions to exhibit list and declarations and correspondence with plan (1.2); review and comment on the motion to seal (.2); prepare for and participate in call with R. Izakelian, A. Jaquet, E. Moore, R. Harrington, L. Weber regarding confirmation hearing preparation and tasks (.5).	2.60	5,057.00
11/30/25	EM	Video conference with P. Tomasco, A. Jaquet, R. Izakelian, and R. Harrington re: confirmation (.5).	0.50	355.00
11/30/25	EM	Prepare exhibits for hearing (.2).	0.20	142.00

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December 16, 2025
Page 33

Matter #: 12875-00001
Invoice Number: 101-0000201437

SUBTOTAL		207.70	344,459.00

Fee Summary

Attorneys	Init.	Title	Hours	Rate	Amount
Patty Tomasco	PT	Partner	123.10	1,945.00	239,429.50
Razmig Izakelian	RI	Associate	41.30	1,665.00	68,764.50
Alain Jaquet	AJ4	Associate	99.80	1,610.00	160,678.00
Ben Roth	BR4	Associate	11.30	1,610.00	18,193.00
Rachel Harrington	RH9	Associate	36.80	1,315.00	48,392.00
Emily Moore	EM	Law Clerk	26.80	710.00	19,028.00

Case Assistants	Init.	Title	Hours	Rate	Amount
Barbara J Howell	BH2	Paralegal	43.60	655.00	28,558.00

Litigation Support/Document Management Services	Init.	Title	Hours	Rate	Amount
Raul Vasquez	RV2	Litigation Support	2.70	210.00	567.00

Expense Summary

Description		Amount
Express mail		161.27
Hearing transcript(s)		27.55
Online Research		0.00
Document Reproduction	0.10	16.50
Word processing		0.00
Courier		37.18
Out-of-Town Travel		147.95
Air travel		1,652.93
Local meals		500.41
PACER Services		0.00

Litigation Support Costs
(Charges based on market not cost)

quinn emanuel trial lawyers

December 16, 2025
Page 34

Matter #: 12875-00001
Invoice Number: 101-0000201437

Description		Amount
RelOne User Fee		0.00
RelOne Processing		0.00
RelOne Repository Hosting (Per GB)		1,479.14
RelOne Active Hosting (Per GB)		4,306.29
	Total Expenses	$8,329.22

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865 S. Figueroa Street, 10th Floor
Los Angeles, California 90017

January 15, 2026

Cameron Blackmon
Rhodium Enterprises, Inc.
4146 W US Highway 79
Rockdale, TX 76567

Matter #: 12875-00001
Invoice Number: 101-0000203054
Responsible Attorney: Patty Tomasco

Rhodium- restructure of company

For Professional Services through December 31, 2025 in connection with a potential restructuring of this crypto mining company.

Fees	$283,249.00
Travel Adjustment (50%)	-$5,411.25
Net Billed Fees	$277,837.75
Expenses	$13,826.97
Net Amount	$291,664.72
Total Due This Invoice	$291,664.72
Balance Due from Previous Statement(s)	$1,318,846.32
Total Balance Due	$1,610,511.04

Confidential – May include attorney-client privileged and work-product information

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Statement Detail

ii Asset Disposition

12/02/25	BH2	Finalize (.3) and file the Declaration of Chris Wheeler for Motion to Enforce PSA with Whinstone (.3).	0.60	393.00
12/09/25	PT	Review and revise the proposed order granting the motion to enforce sale order (.6); correspond with C. Topping regarding same (.4); review and begin revising declaration of C. Wheeler (.3).	1.30	2,528.50
12/10/25	PT	Revise amended declaration of C. Wheeler regarding history of negotiations with Whinstone and circulate to C. Topping and C. Wheeler (1.2); prepare and participate in call re motion to enforce terms of revised proposed order with C. Topping, T. Schmeltz, M. Robinson, D. Dunn, C. Wheeler to review declaration and terms of revised proposed order (.6); finalize and circulate C. Wheeler amended declaration (.4).	2.20	4,279.00
12/11/25	BH2	Finalize the Amended Declaration of Chris Wheeler (.3) and file same (.3); draft a Notice of Proposed Order for the Motion to Enforce the Purchase and Sale Agreement (.4) and file same (.2).	1.20	786.00
12/11/25	PT	Finalize Wheeler amended declaration (.7) and coordinate uploading of the revised proposed order (.1).	0.80	1,556.00
		SUBTOTAL	6.10	9,542.50

iv Avoidance Action Analysis

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12/11/25	BH2	Register attorneys to attend the Rhodium hearing (.2); email communications with the witness, Mr. Eaton, regarding attending the hearing via the Court's "gotomeeting" platform (.2).	0.40	262.00
		SUBTOTAL	0.40	262.00

vi Case Administration

12/03/25	RH9	Prepare for (.5) and attend telephone conference with the Quinn Emanuel team to discuss strategy and assignments (.5).	0.50	657.50
12/04/25	BR4	Prepare for (.2) and telephone call with the Quinn Emanuel team regarding case updates (0.5).	0.70	1,127.00
12/10/25	BH2	Review the Pacer docket (.4) and update files to the current status, including calendaring hearing dates and deadlines (.8).	1.20	786.00
12/16/25	BH2	Obtain copies of the December 3 and December 11th hearing transcripts (.3); review Pacer docket for new filings (.3) and download same for attorneys' review (.4).	1.00	655.00
12/17/25	BH2	Review Pacer docket (.3) and update files to current status for attorneys' review (.3).	0.60	393.00
12/19/25	BH2	Finalize (.4) and file the Emergency Motion of Rhodium for an Order Setting Bar Date for Administrative Claims (.3); forward a file-stamped copy of the Emergency Motion and the Order Confirming the Chapter 11 Plan of Liquidation to the Client (.1).	0.80	524.00
12/22/25	BH2	Finalize (.3) and file the 19 monthly operating reports for Rhodium and	1.90	1,244.50

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		the related entities (1.3); forward file-stamped copies to the Client (.3).		
12/29/25	RI	Conference with the company, Quinn Emanuel, Barnes & Thornburg, and Province teams regarding the effective date (0.8).	0.80	1,332.00
		SUBTOTAL	7.50	6,719.00

vii Claims Administration and Objections

12/05/25	AJ4	Prepare a memorandum regarding the review and analysis of the latest proofs of claim, including by corresponding with F. Sabzevari, A. Popescu and P. Tomasco in connection with the same (0.5).	0.50	805.00
12/09/25	RH9	Draft response and supplement to Midas notice of appeal. (2.5).	2.50	3,287.50
12/23/25	BH2	Finalize (.3) and file the proposed Order Setting Bar Date (.3).	0.60	393.00
		SUBTOTAL	3.60	4,485.50

viii Corporate Governance and Board Matters

12/01/25	PT	Prepare and attend Rhodium Board Meeting (.5).	0.50	972.50
12/31/25	PT	Prepare and attend Rhodium Board Meeting (.8).	0.80	1,556.00
		SUBTOTAL	1.30	2,528.50

x Employment and Fee Applications

12/01/25	BH2	Forward fee application orders to Province and Barnes & Thornburg (.3).	0.30	196.50

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12/03/25	AJ4	Correspond and confer with R. Harrington in relation to fee dispute and privilege issues (0.3).	0.30	483.00
12/03/25	BH2	File the Fourteenth Monthly Fee Statement from Stris & Maher (.3).	0.30	196.50
12/04/25	AJ4	Prepare a memorandum on FRE 502 in connection with the fee dispute (1.7) and confer and correspond with P. Tomasco and R. Harrington regarding the same (.3).	2.00	3,220.00
12/08/25	BH2	Begin to prepare the November monthly fee statement (3.0).	3.00	1,965.00
12/08/25	PT	Prepare and participate in Eaton preparation with P. Lohse, T. Schmeltz, D. Eaton, C. Topping, M. Robinson (.9); correspond with T. Laws regarding rescheduling issues for continued hearing on objection to Lehotsky Keller Cohn fee application and coordinate with M. Hurley regarding same. (.6); coordinate with the Barnes & Thornburg team regarding local rules regarding remote testimony and general orders affecting issue (.4).	1.90	3,695.50
12/11/25	RI	Attend the hearing on the fee application objection (1.0).	1.00	1,665.00
12/11/25	PT	Prepare for and participate in continued hearing on objection to fee application of Lehotsky Keller Cohn (1.1).	1.10	2,139.50
12/15/25	PT	Review and comment on Lehotsky Keller & Cohn and Wheeler declaration and correspond with C. Topping regarding same (.5).	0.50	972.50
12/15/25	RI	Review and analyze the Lehotsky Keller & Cohn briefing (0.5).	0.50	832.50
12/17/25	BH2	Continue to prepare the November monthly fee statement (2.3).	2.30	1,506.50

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12/18/25	BH2	Finalize the Fifteenth Monthly Fee Statement of Quinn Emanuel (.4) and file same (.3); forward file-stamped copy and LEDES data to the parties on the Interim Compensation Order (.2).	0.90	589.50
12/29/25	BH2	Finalize (.1) and file the November Monthly Fee Statement for Province (.3).	0.40	262.00
12/30/25	BH2	Finalize (.1) and file Barnes & Thornburg's November Monthly Fee Statement (.3); forward a file-stamped copy, along with the LEDES data to the U.S. Trustee (.1).	0.50	327.50
		SUBTOTAL	15.00	18,051.50

xii Litigation

12/09/25	BH2	Assist R. Harrington with preparations of the Additional Designation of Record (2.1) and file same (.3).	2.40	1,572.00
		SUBTOTAL	2.40	1,572.00

xiii Non-working Travel

12/03/25	RI	Travel back from confirmation hearing (6.5).	6.50	10,822.50
		SUBTOTAL	6.50	10,822.50

xiv Plan and Disclosure Statement

12/01/25	AJ4	Review and revise the draft filings relating to the confirmation hearing (confirmation brief, D. Eaton's declaration, plan supplement, exhibit list, and agenda) (8.6).	8.60	13,846.00
12/01/25	PT	Coordinate filing of the exhibit list and exhibits and multiple reviews of	9.80	19,061.00

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		exhibits and list (2.1); prepare for and participate in confirmation planning call with R. Harrington, R. Izakelian, A. Jaquet, B. Roth, E. Moore (.5); prepare and participate in call regarding motion to seal issues with R. Izakelian, A. Jaquet (.3); coordinate preparation of agenda and review multiple drafts of agenda (1.2); review and comment on Robinson declaration and Eaton declaration and multiple review and revisions of same (1.2); review and suggest response to Lehotsky Keller Cohn confirmation objection and background research (.8); direct resolution of VanZoeren objection (.2); review and comment on Hurley declaration (.2); continue review and comment on confirmation brief (1.6); telephone conference with C. Topping regarding additional healthcare policy and coordinate adding additional contract to assumed list (.5); review and revise amended plan supplement and communications regarding same (.8); continue preparation for the confirmation hearing (.4).		
12/01/25	BH2	Revise the Witness and Exhibit List for December 3rd hearing (6.0) and file the sealed and unsealed versions (3.9); download sealed exhibits (.6) and forward to attorneys and opposing counsel (.2); finalize (.6) and file the proposed confirmation order (.3); finalize (.4) and file the Motion to Seal (.3).	12.30	8,056.50
12/01/25	RH9	Conference with team to discuss preparations for the confirmation hearing (.5).	0.50	657.50

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12/01/25	RH9	Draft confirmation hearing script (7.4).	7.40	9,731.00
12/01/25	RH9	Implement edits and comments to the proposed confirmation order (1.4).	1.40	1,841.00
12/01/25	EM	Conference with P. Tomasco, B. Roth, R. Harrington, A. Jaquet re: plan confirmation (.4); draft the agenda for the plan confirmation hearing (4.1).	4.50	3,195.00
12/01/25	BR4	Call (partial) with the Quinn Emanuel team regarding case updates and confirmation planning (0.4); call with the Quinn Emanuel team regarding the confirmation hearing (0.5).	0.90	1,449.00
12/01/25	RI	Review and revise the confirmation brief, legal research regarding same (5.7).	5.70	9,490.50
12/02/25	AJ4	Review and revise the draft plan supplement and exhibits and the proposed confirmation order. (12.5).	12.50	20,125.00
12/02/25	RI	Correspondence with plan proponents regarding plan, conference with ELG Digital Horizons (1.5); review and revise the plan supplement (5.8); review and analyze plan and exhibits (1.5), prepare for confirmation hearing (2.0).	10.80	17,982.00
12/02/25	RH9	Conference with team to discuss preparations for the confirmation hearing (.5).	0.50	657.50
12/02/25	RH9	Revise the confirmation hearing script (.7).	0.70	920.50
12/02/25	PT	Prepare and participate in call regarding severance exhibit with L. Weber, R. Izakelian, T. Schmeltz, K. Kansa, M. Hurley, K. Zaharis, A. Schultz (.4); witness preparation with M. Robinson (1.6); review and revise	7.10	13,809.50

		proposed hearing agenda and suggest additions (.9); coordinate hearing preparation with B. Howell (.2); prepare for and meet with T. Schmeltz, S. Schultz and D. Eaton regarding hearing preparation (1.1); review and revise the proposed confirmation order to resolve plan objections (.5); review and comment on the confirmation script and additions to same (.8); review and revise the plan administrator agreement (.3); correspondence regarding revised plan supplement and filing of revised proposed confirmation order (.9); review retained cause of action changes and suggest changes to S. Schultz (.4).		
12/02/25	BR4	Call with Quinn Emanuel team regarding confirmation (0.7).	0.70	1,127.00
12/02/25	BH2	Revise and file the Agenda (1.1); revise the Amended Agenda and file same (.6); finalize and file the Amended Plan Supplement (.9); finalize and file the Amended Exhibit List (1.3); assist attorneys with confirmation trial preparation (9.7).	13.60	8,908.00
12/03/25	AJ4	Coordinate filing the plan supplement and revised plan supplement with B. Howell (0.7); prepare for and attend hearing (6.5).	7.20	11,592.00
12/03/25	RI	Prepare for confirmation (3.0); attend confirmation hearing (6.0).	9.00	14,985.00
12/03/25	PT	Multiple conferences to prepare for confirmation hearing (3.3); prepare and attend Confirmation hearing and follow on Lehotsky Keller Cohn dispute to protect for privilege (5.1).	8.40	16,338.00
12/03/25	BH2	Draft a Notice of Redline (.4) and file same (.3); file numerous documents on behalf of the Debtors as requested	1.30	851.50

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		by the Court during the confirmation hearing (.6).		
12/03/25	BH2	Continue to prepare for the confirmation hearing (1.9); attend the morning session of the confirmation hearing (2.5); assist attorneys during the afternoon session with obtaining documents and delivery to court (.9).	5.30	3,471.50
12/03/25	BR4	Attend confirmation hearing (partial) (2.3).	2.30	3,703.00
12/04/25	RH9	Legal research into privilege issues (1.0).	1.00	1,315.00
12/04/25	BH2	Review the Courtroom Minutes from December 3, 2025, confirmation hearing (.1) and email R. Izakelian and P. Tomasco regarding the Exhibit List (.1); prepare an amended Exhibit List adding the Docket numbers as requested by the Court (.9); file same (.3).	1.40	917.00
12/04/25	PT	Prepare and participate in conference with R. Harrington, R. Izakelian, A. Jaquet, B. Roth, regarding privilege research requested by Court (.5); follow up review of at-issue waiver (.7); coordinate preparation of amended exhibit list with E. Moore and B. Howell (.4); follow up with S. Schultz regarding admitted exhibits and transcript for continued confirmation hearing (.2).	1.80	3,501.00
12/05/25	AJ4	Prepare a memorandum regarding the confirmation hearing (1.5).	1.50	2,415.00
12/07/25	CK5	Call with P. Tomasco, Akin team, and Barnes & Thornberg team re confirmation scheduling (0.5).	0.50	780.00
12/07/25	PT	Prepare for and participate in a strategy call with S. Schultz, M. Hurley, and C. Kelly regarding rescheduling a hearing on	1.20	2,334.00

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		confirmation and next steps (.9); correspond with C. Kelly regarding scheduling issues (.3).		
12/08/25	CK5	Attention to confirmation scheduling, including calls with Chambers and P. Tomasco (0.5).	0.50	780.00
12/08/25	PT	Prepare for and participate in a call regarding scheduling a continued confirmation hearing with M. Hurley, C. Potter, D. Eaton (.6).	0.60	1,167.00
12/10/25	PT	Prepare and participate in a call regarding Eaton preparation with P. Lohse, T. Schmeltz, D. Eaton, M. Robinson, M. Hurley, S. Schultz, B. Funk, C. Potter (.3).	0.30	583.50
12/11/25	CK5	Attend continued confirmation hearing (1.5).	1.50	2,340.00
12/11/25	PT	Correspondence with plan support parties regarding confirmation hearing strategy and recommendations (.6).	0.60	1,167.00
12/12/25	PT	Conference with D. Eaton regarding confirmation issues and planning (.7).	0.70	1,361.50
12/17/25	PT	Correspond with R. Izakelian regarding strategy for continued confirmation hearing (.3); follow up correspondence regarding results of hearing (.2); call with R. Izakelian regarding hearing. (.3).	0.80	1,556.00
12/17/25	RI	Attend confirmation hearing (3.0); review and revise the proposed confirmation order and order on motion to enforce PSA (1.2).	4.20	6,993.00
12/17/25	BH2	Draft the Notice of Effective Date (.9).	0.90	589.50
12/19/25	PT	Prepare for and participate in a call to discuss revisions to the Confirmation Order with S. Schultz and strategy for streamlining issues (.6).	0.60	1,167.00

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12/19/25	PT	Correspondence with C. Topping regarding implementation of the plan, the effective date, and employment terminations issues associated therewith (1.4).	1.40	2,723.00
12/19/25	BH2	Finalize (.3) and file the proposed Confirmation Order (.3).	0.60	393.00
12/19/25	RI	Review and revise the proposed confirmation order (.5), review and revise the motion for administrative claims bar date (.4), review and revise the notice of effective date (.4).	1.30	2,164.50
12/19/25	AJ4	Review and revise the bar date motion for administrative claims and notice of effective date (3.2); correspond with P. Tomasco, B. Howell, and R. Izakelian in connection with the same (0.3).	3.50	5,635.00
12/23/25	PT	Prepare for hearing (1.0); attend hearing on motion setting bar date for filing proofs of administrative expense claims (.4); coordinate uploading of revised order and redline (.5).	1.90	3,695.50
12/28/25	PT	Correspondence with the Akin team regarding the effective date planning and lack of communication regarding same (.2); correspond with C. Topping regarding same (.1).	0.30	583.50
12/29/25	PT	Prepare for and participate in the Rhodium Plan Effectiveness Checkpoint Call with C. Topping, T. Schmeltz, M. Robinson, A. Popescu, K. Hays, Chase Blackmon, Cameron Blackmon, M. Soule (.6).	0.60	1,167.00
12/30/25	PT	Prepare and participate in Plan Effectiveness Touchpoint Call with C. Topping, K. Kansa, R. Izakelian, M. Robinson, A. Popescu, Chase	0.70	1,361.50

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		Blackmon, Cameron Blackmon, K. Hays, M. Soule (.7).		
12/31/25	PT	Prepare and participate in Plan Effectiveness Touchpoint Call with C. Topping, K. Kansa, R. Izakelian, M. Robinson, A. Popescu, Chase Blackmon, Cameron Blackmon, K. Hays, M. Soule (.4).	0.40	778.00
		SUBTOTAL	159.30	229,265.50

Fee Summary

Attorneys	Init.	Title	Hours	Rate	Amount
Patty Tomasco	PT	Partner	46.30	1,945.00	90,053.50
Razmig Izakelian	RI	Associate	39.80	1,665.00	66,267.00
Alain Jaquet	AJ4	Associate	36.10	1,610.00	58,121.00
Ben Roth	BR4	Associate	4.60	1,610.00	7,406.00
Cameron Kelly	CK5	Associate	2.50	1,560.00	3,900.00
Rachel Harrington	RH9	Associate	14.50	1,315.00	19,067.50
Emily Moore	EM	Law Clerk	4.50	710.00	3,195.00
Case Assistants	**Init.**	**Title**	**Hours**	**Rate**	**Amount**
Barbara J Howell	BH2	Paralegal	53.80	655.00	35,239.00

Expense Summary

Description		Amount
Meals during travel		41.34
Hearing transcript(s)		348.95
Document Reproduction	0.10	701.50
Travel		198.92
Color Document Reproduction	0.25	1,859.75
Word processing		0.00
Hotel		165.19
Velobind		84.84
Out-of-Town Travel		170.14

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Matter #: 12875-00001
Invoice Number: 101-0000203054

Description	Amount
Air travel	1,372.95
Local meals	350.73
Tabs	280.50

Litigation Support Costs

Database Archiving per GB	0.00
RelOne Active Hosting (Per GB)	8,252.16
Total Expenses	$13,826.97

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865 S. Figueroa Street, 10th Floor
Los Angeles, California 90017

February 05, 2026

Cameron Blackmon
Rhodium Enterprises, Inc.
4146 W US Highway 79
Rockdale, TX 76567

Matter #: 12875-00001
Invoice Number: 101-0000204236
Responsible Attorney: Patty Tomasco

Rhodium- restructure of company

For Professional Services through January 14, 2026 in connection with a potential restructuring of this crypto mining company.

Fees	$22,369.00
Expenses	$0.00
Total Due This Invoice	$22,369.00
Balance Due from Previous Statement(s)	$1,135,293.82
Total Balance Due	$1,157,662.82

Confidential – May include attorney-client privileged and work-product information

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Statement Detail

vi Case Administration

01/02/26	PT	Correspondence with R. Harrington regarding Kelvion issues (.2).	0.20	446.00
01/12/26	BH2	File 19 monthly operating reports (1.0); download file-stamped copies and forward to the Client (.4); review Pacer docket (.3) and update files to the current status, calendaring deadlines and hearing dates (.5).	2.20	1,584.00
		SUBTOTAL	2.40	2,030.00

vii Claims Administration and Objections

01/08/26	PT	Suggest strategy for additional LTIP vesting claims with employees with C. Topping and M. Soule (.2).	0.20	446.00
		SUBTOTAL	0.20	446.00

viii Corporate Governance and board Matters

01/12/26	PT	Prepare and attend Rhodium Board Meeting (1.4); review and comment on issues related to necessity for board vote in light of court orders and research regarding same (.4).	1.80	4,014.00
		SUBTOTAL	1.80	4,014.00

x Employment and Fee Applications

01/06/26	BH2	Finalize (.3) and file BDO's final fee application (.3).	0.60	432.00
01/13/26	BH2	Review the retention application filed by Province at the beginning of the case (.3); brief telephone call with D. Dachelet (Province) to discuss amending Province's retention	0.60	432.00

		application (.3).		
01/14/26	BH2	Begin to prepare the December monthly fee statement (2.1).	2.10	1,512.00
		SUBTOTAL	3.30	2,376.00

xii Litigation

01/13/26	BH2	Review the Notices of Filing of an Appeal (.2) and calendar deadlines (.2).	0.40	288.00
		SUBTOTAL	0.40	288.00

xiv Plan and Disclosure Statement

01/06/26	PT	Emails regarding effective date issues with C. Topping and T. Schmeltz and plan administrator transition issues; emails with S. Schultz regarding same (1.1).	1.10	2,453.00
01/07/26	PT	Correspondence with C. Topping regarding effective date transition issues and employee contracts and privilege issues (.4); follow up correspondence regarding ongoing duties and responsibilities prior to effective date (.3).	0.70	1,561.00
01/09/26	PT	Telephone conference with C. Topping regarding plan effective date issues (.4); prepare (.2) and participate in call with M. Hurley, S. Schultz regarding issues regarding payment of LKC fee award and effective date issues (.3); correspondence with C. Topping regarding effective date issues (.3).	1.20	2,676.00
01/10/26	PT	Correspondence with C. Topping regarding effective date issues (.6).	0.60	1,338.00
01/12/26	PT	Prepare and participate in plan effective date call with M. Hurley, S.	0.40	892.00

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		Schultz (.4).		
01/13/26	PT	Coordinate with the Akin team regarding the conformed notice of effective date (.5).	0.50	1,115.00
01/13/26	BH2	Review the notice of the effective date and update same (.6); forward to Akin Gump for review and revisions (.1).	0.70	504.00
01/14/26	PT	Prepare and participate in call with S. Schultz and M. Hurley regarding effective date preparations, status of various claims and assets to be wrapped up and forward relevant correspondence and documents (1.1); coordinate revisions to notice of effective date with B. Howell (.1).	1.20	2,676.00
		SUBTOTAL	6.40	13,215.00

Fee Summary

Attorneys	**Init.**	**Title**	**Hours**	**Rate**	**Amount**
Patty Tomasco	PT	Partner	7.90	2,230.00	17,617.00
Case Assistants	**Init.**	**Title**	**Hours**	**Rate**	**Amount**
Barbara J Howell	BH2	Paralegal	6.60	720.00	4,752.00

Expense Summary

Description	Amount
PACER Services	0.00
Total Expenses	$0.00

TAB C

February Fees				
Timekeeper	Rate	~Time	Fees	Narrative
M. Hurley	$ 2,795.00	1	$ 2,795.00	address Midas Green settlement offer including call with Stris.
S. Baham	$ 1,350.00	0.7	$ 945.00	Review Quinn and Stris fee statements; corr re same; review docket for Midas green documents; corr re same.
M. Hurley	$ 2,795.00	0.5	$ 1,397.50	correspondence with Midas Green
J. Zabbia	$ 355.00	0.3	$ 106.50	Add up post Jan 14th fees for Stris Application for Compensation.
S. Baham	$ 1,350.00	0.5	$ 675.00	review hearing transcripts re Midas Green ruling; confer re same
K. Yang	$ 1,175.00	0.2	$ 235.00	Search for transcript of J. Perez ruling on Midas Green for M. Hurley
S. Baham	$ 1,350.00	0.6	$ 810.00	corr re Midas Green next steps
		Total Fees	$ 6,964.00	
		Total Fees with 10% discount	$ 6,267.60	
March Fees				
Timekeeper	Rate	~Time	Fees	Narrative
M. Hurley	$ 2,795.00	0.4	$ 1,118.00	Address issues relating to Midas Green sanctios motion including review of Papaya case and correspondence with Stris
M. Hurley	$ 2,795.00	0.5	$ 1,397.50	address Midas Green abatement
S. Baham	$ 1,350.00	2.2	$ 2,970.00	Draft background section of midas green request; confer re same
S. Baham	$ 1,350.00	2	$ 2,700.00	Review and revise abatement request
S. Baham	$ 1,350.00	2	$ 2,700.00	review and reivse abatment pleading; corr re same
M. Hurley	$ 2,795.00	2.9	$ 8,105.50	Review and revise abatement motion
S. Baham	$ 1,350.00	1.3	$ 1,755.00	Review and revise abatement request; corr re same
M. Hurley	$ 2,795.00	0.5	$ 1,397.50	Revise Midas Green sanctions
S. Baham	$ 1,350.00	2	$ 2,700.00	review and revise Midas green pleading; review fees re same
		Total Fees	$ 24,843.50	
		Total Fees with 10% discount	$ 22,359.15	
April Fees				
Timekeeper	Rate	~Time	Fees	Narrative
S. Baham	$ 1,350.00	2	$ 2,700.00	review and revise midas green pleading; corr re same
S. Schultz	$ 2,795.00	1	$ 2,795.00	Review filing version of motion to end abatement
M. Hurley	$ 2,795.00	2.1	$ 5,869.50	Revise and finalize abatement and sanctions submission (Midas Green)
B. Kemp	$ 575.00	1	$ 575.00	Confer with S. Baham re filing Request to End Abatement; prepare for and file same; circulate filed request to attorney team; update docket folder;
E. Scott	$ 1,995.00	1	$ 1,995.00	Review filing regarding Midas Green
S. Baham	$ 1,350.00	2	$ 2,700.00	reivew and revise midas green pleading; corr re same; draft email to chambers re same;
S. Baham	$ 1,350.00	1	$ 1,350.00	draft notice of hearing re midas green hearing; corr re same

		Total Fees	$ 17,984.50	
		Total Fees with 10% discount	$ 16,186.05	
May Fees				
Timekeeper	Rate	~Time	Fees	Narrative
E. Scott	$ 1,995.00	0.2	$ 399.00	confer with Akin team regarding Midas Green next steps
S. Baham	$ 1,350.00	0.5	$ 675.00	review MIDAS green documents
M. Hurley	$ 2,795.00	0.3	$ 838.50	Confer with Stris re Midas Green.
E. Scott	$ 1,995.00	0.8	$ 1,596.00	Call with Stris regarding Midas Green; review Midas Green objection and call with Akin team regarding same; reivew Midas Green order
M. Hurley	$ 2,795.00	0.5	$ 1,397.50	address Midas Green issues.
E. Scott	$ 1,995.00	0.3	$ 598.50	Prepare materials for IMPC and review updates regarding Temple Green and Midas Green;
S. Baham	$ 1,350.00	0.2	$ 270.00	corr re Midas Green issue
M. Hurley	$ 2,795.00	2	$ 5,590.00	address Midas Green issues.
E. Scott	$ 1,995.00	0.8	$ 1,596.00	review Midas Green documents and confer with Akin team regarding same.
S. Baham	$ 1,350.00	1	$ 1,350.00	review Midas Green order; confer re same
M. Hurley	$ 2,795.00	1	$ 2,795.00	address Midas Green
E. Scott	$ 1,995.00	0.4	$ 798.00	analyze Protective Orders and confer with Akin team regarding same with respect to confidentiality issues related to Midas Green
S. Schultz	$ 2,795.00	0.5	$ 1,397.50	Participate in Midas Green hearing; follow-up call with M. Hurley regarding same;
S. Baham	$ 1,350.00	0.3	$ 405.00	Corr re hearing; pull docs re same
M. Hurley	$ 2,795.00	3.5	$ 9,782.50	Prep for Midas Green hearing; Midas Green hearing; follow up with team
E. Scott	$ 1,995.00	0.2	$ 399.00	Attend hearing regarding Midas Green.
S. Baham	$ 1,350.00	2	$ 2,700.00	Hearing on Midas Green abatement; corr re same
M. Hurley	$ 2,795.00	1	$ 2,795.00	address Midas Green issues.
M. Hurley	$ 2,795.00	2.5	$ 6,987.50	address Midas Green .
E. Scott	$ 1,995.00	1	$ 1,995.00	Call with counsel for Midas Green
M. Hurley	$ 2,795.00	0.5	$ 1,397.50	address Midas Green
E. Scott	$ 1,995.00	0.8	$ 1,596.00	review Midas Green Notice and Motion to Seal and confer with Akin team regarding same; confer with S. Bahman regarding upcoming filings; confer with Akin team regarding Midas Green research
M. Hurley	$ 2,795.00	0.5	$ 1,397.50	Address LKC and Midas Green filings.
S. Baham	$ 1,350.00	1.1	$ 1,485.00	Review docket for sanctions filings; corr re same
		Total Fees	$ 50,241.00	
		Total Fees with 10% discount	$ 45,216.90	
		Total Fees	$ 90,029.70	