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]	§	

FOURTH STIPULATION BETWEEN THE WIND DOWN DEBTOR AND BARNES & THORNBURG LLP

[Relates to Dkt. Nos. 264, 2322, 2353, 2412, and 2449[2]]

The Wind Down Debtor and Barnes & Thornburg LLP ("B&T," and with the Wind Down Debtor, the "Parties"), by and through their undersigned counsel, hereby stipulate and agree as set forth below in this stipulation (the "Stipulation").

RECITALS

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

2. On February 27, 2026, B&T filed its *Fifth and Final Fee Application of Barnes & Thornburg LLP* [Dkt. No. 2322] seeking allowance and approval of certain compensation to B&T

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

on an interim and final basis, and reimbursement of certain expenses (the "Application"). Utilizing the Court's negative notice procedures, the Application sets the deadline for any party to object or otherwise respond to the Application as Friday, March 20, 2026 – the 21st day after B&T's filing of the Application (the "Original Response Deadline").

3. On March 18, 2026, the Parties filed the *Stipulation Between the Wind Down Debtor and Barnes & Thornburg LLP* [Dkt. No. 2353] (the "First Stipulation"), stipulating to an extension of the Original Response Deadline, or any other contrary response deadline, to Thursday, June 18, 2026 (the "Extended Response Deadline").

4. On June 12, 2026, the Parties filed the *Second Stipulation Between the Wind Down Debtor and Barnes & Thornburg LLP* [Dkt. No. 2412] (the "Second Stipulation"), stipulating to an extension of the Original Response Deadline, or any other contrary response deadline, to Thursday, July 2, 2026 (the "Extended Response Deadline").

5. On July 1, 2026, the Parties filed the *Third Stipulation Between the Wind Down Debtor and Barnes & Thornburg LLP* [Dkt. No. 2449] (the "Third Stipulation"), stipulating to an extension of the Original Response Deadline, or any other contrary response deadline, to Monday, August 17, 2026 (the "Extended Response Deadline")

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

1. Notwithstanding the Extended Response Deadline or any other contrary response deadline, the Parties have agreed that the Wind Down Debtor's deadline to file an objection or any other response to the Application is **Monday, October 12, 2026.**

/s/ Chase J. Potter
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