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

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| In re: | § | Chapter 11 |
| Rhodium Enterprises, Inc. | § | Case No. 24-90454 (ARP) |
| Wind Down Debtor.[1] | § | |

**STIPULATION REGARDING EXTENDING THE OBJECTION DEADLINE TO RESPOND TO EATON ADMINISTRATIVE CLAIM**

GXD Labs, LLC as plan administrator (the "**Plan Administrator**") for Rhodium Enterprises, Inc., the wind down Debtor entity (the "**Wind Down Debtor**" and, prior to the Effective Date of the Plan together with its affiliated debtors, the "**Debtors**") in the above-captioned chapter 11 case (together with the chapter 11 cases of the Debtors, the "**Chapter 11 Cases**") and David Eaton ("**Mr. Eaton**"), in his capacity as a former director of Rhodium Enterprises, Inc. and as a former member of the Special Committee of Rhodium Enterprises' Board of Directors (the "**Special Committee**"), by and through their undersigned counsel, hereby stipulate and agree as set forth below.

**RECITALS**

**WHEREAS**, on December 19, 2025, the Court approved the *Second Amended Joint Chapter 11 Plan of Liquidation for Rhodium Encore LLC and its Affiliated Debtors Proposed by*

[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.

*Debtors and Ad Hoc Group of SAFE Parties* [Docket No. 2062] (the "**Plan**"),[2][3] and

**WHEREAS**, on December 24, 2025, the Court entered the *Order (I) Setting Bar Date for Filing Proofs of Administrative Expense Claims and (II) Approving Notice of the Administrative Expense Claims Bar Date and the Plan Effective Date, and (III) Granting Related Relief* [Docket No. 2197] (the "**Administrative Claim Bar Date Order**"), and

**WHEREAS**, on January 14, 2026, the Plan went effective (the "**Effective Date**") and the Court entered the *Notice of (I) Effective Date of Debtors' Second Amended Joint Chapter 11 Plan of Reorganization and (II) Bar Dates for Certain Claims* [Docket No. 2247], and

**WHEREAS**, the Administrative Claim Bar Date Order provides that objections to proofs of administrative expense claims must be served no later than 60 days after the Effective Date of the Plan, or March 16, 2026 (the "**Objection Deadline**"),[4] and

**WHEREAS**, on February 10, 2026, Mr. Eaton timely filed his *Proof of Administrative Claim or, in the Alternative, Claim for Damages Relating to Rejection of Indemnification and Other Obligations, Asserted by David Eaton* [Docket No. 2292] (the "**Eaton Administrative Claim**"), and

**WHEREAS**, on February 23, 2026, the parties agreed to extend the Objection Deadline to June 15, 2026, and

**WHEREAS**, on June 15, 2026, the parties agreed to extend the Objection Deadline to September 14, 2026, and

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[2] *See Order Approving the Disclosure Statement For, and Confirming, Second Amended Joint Chapter 11 Plan of Liquidation for Rhodium Encore LLC and its Affiliated Debtors Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 2170].

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

[4] March 15, 2026, is sixty (60) days after the Plan's January 14, 2026, Effective Date. However, pursuant to Fed. R. Bankr. P. 9006(a)(1)(C), because that date falls on a Sunday, the deadline to object was March 16, 2026.

**WHEREAS**, the Plan Administrator has requested and Mr. Eaton has agreed to further extend the Objection Deadline as to the Eaton Administrative Claim.

[*Remainder of page intentionally left blank.*]

**IT IS HEREBY STIPULATED AND AGREED,**

1. The Objection Deadline to respond to the Eaton Administrative Claim shall be extended from September 14, 2026 to November 16, 2026.

**STIPULATED AND AGREED:**

Dated: September 14, 2026

**AKIN GUMP STRAUSS HAUER & FELD LLP**

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