Docket #0036 Date Filed: 09/14/2026

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]	§	

STIPULATION REGARDING EXTENDING THE OBJECTION DEADLINE TO RESPOND TO TOPPING 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 Charles R. Topping ("**Mr. Topping**"), in his capacity as a former officer of Rhodium Enterprises, Inc., 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.

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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 13, 2026, Mr. Topping timely filed his *Proof of Administrative Claim or, in the Alternative, Claim for Damages Relating to Rejection of Indemnification and Other Obligations, Asserted by Charles R. Topping* [Docket No. 2301] (the "**Topping Administrative Claim**"), and

WHEREAS, on February 24, 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. Topping has agreed to further extend the Objection Deadline as to the Topping Administrative Claim.

[*Remainder of page intentionally left blank.*]

IT IS HEREBY STIPULATED AND AGREED,

1. The Objection Deadline to respond to the Topping Administrative Claim shall be extended from September 14, 2026 to December 31, 2026.

STIPULATED AND AGREED:

Dated: September 14, 2026

AKIN GUMP STRAUSS HAUER & FELD LLP

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