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.	§	

STIPULATION AND AGREED ORDER BETWEEN
THE WIND DOWN DEBTOR AND KIRKLAND & ELLIS LLP

The Wind Down Debtor and Kirkland & Ellis, LLP and Kirkland & Ellis International, LLP (collectively, "Kirkland", and with the Wind Down Debtor, the "Parties"), by and through their undersigned counsel, hereby stipulate and agree as set forth below in this stipulation (the "Stipulation").

RECITALS

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

2. On January 23, 2025, the Debtors, including Debtors Rhodium Encore LLC ("Encore") and Rhodium Enterprises, Inc. ("Enterprises"), filed amended schedules of assets and liabilities (the "Schedules"). *See* [Dkt. Nos. 685 (amended Schedules for Encore), 687 (amended schedules for Enterprises)]. Encore amended its Schedules to remove a noncontingent, liquidated, and undisputed claim in the amount of $4,309,979.47 held by Kirkland (the "Scheduled Claim"), [Dkt No. 685] Amended Sched. E/F Pt. 2, and Enterprises amended its Schedules to add the noncontingent, liquidated, and undisputed Scheduled Claim, [Dkt No. 687] Amended Sched. E/F Pt. 2.

3. On February 18, 2025, Kirkland filed its Proofs of Claim in each of the Debtors'

bankruptcy cases for the identical amount, identified as claim numbers 232, 233, 234, 235, 236, 237, 238, 239, 240, and 241 (collectively, the "Proof of Claim").

4. On December 19, 2025, the Bankruptcy Court entered its *Order Approving the Disclosure Statement for, and Confirming the Second Amended Joint Chapter 11 Plan of Liquidation* [Dkt. No. 2170], confirming the *Second Amended Joint Chapter 11 Plan of Liquidation* (the "Plan"). The Plan provided that the objection deadline to proofs of claim and interests could be extended once by right by filing a notice, and additionally with Court approval.

5. On January 14, 2026, the Debtors and the Ad Hoc Group of SAFE Parties filed the *Notice of (I) Effective Date of Debtors' Second Amended Joint Chapter 11 Plan of Reorganization and (II) Bar Dates for Certain Claims* (the "Notice of Effective Date"). The Notice of Effective Date provides that the Debtors' Plan[1] became effective on January 14, 2026 (the "Effective Date").

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

7. Pursuant to Federal Rule of Bankruptcy Procedure 9006(a)(1)(C), because the deadline of October 12, 2026, fell on a federal holiday, the relevant period continues to run until the end of the next day that is not a weekend or holiday. Thus, the current deadline to object to proofs of claim and interests is Tuesday, October 13, 2026.

8. The Parties are in discussions with respect to the Proof of Claim and hereby stipulate to the terms below in order to continue said discussions.

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

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

A. Nothwithstanding any contrary requirement contained in the Plan or otherwise in these bankruptcy cases, the Parties have agreed that the deadline to file an objection or any other response to the Proof of Claim is extended to **Friday, October 23, 2026.**

SO ORDERED.

Signed:

Alfredo R Pérez
United States Bankruptcy Judge

STIPULATED AND AGREED:
Dated: October 13, 2026

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