Docket #0056 Date Filed: 10/30/2026
United States Bankruptcy Court
Southern District of Texas
**ENTERED**
October 14, 2026
Nathan Ochsner, Clerk

**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'


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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: October 14, 2026

Alfredo R Pérez
United States Bankruptcy Judge

**STIPULATED AND AGREED:**
Dated: October 13, 2026

*/s/ Chase J. Potter*
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***Counsel for Kirkland & Ellis LLP***

United States Bankruptcy Court
Southern District of Texas

In re:
Rhodium Enterprises, Inc.
Debtor

Case No. 24-90454-arp
Chapter 11

# CERTIFICATE OF NOTICE

District/off: 0541-4 User: ADIuser Page 1 of 1
Date Rcvd: Oct 29, 2026 Form ID: pdf002 Total Noticed: 4

The following symbols are used throughout this certificate:

| Symbol | Definition |
|---|---|
| + | Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP. |

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 30, 2026:**

| Recip ID | | Recipient Name and Address |
|---|---|---|
| db | + | Rhodium Enterprises, Inc., Quinn Emanuel Urquhart & Sullivan, LLP, c/o Patricia B. Tomasco, 700 Louisiana, Suite 3900, Houston, TX 77002-2841 |
| intp | + | Bruce Kutsche, 5624 Fieldstone Ct, Middleville, MI 49333-8418 |
| intp | + | GXD Labs, LLC as Plan Administrator for the Wind D, Sarah Link Schultz, Akin Gump Strauss Hauer & Feld, 2300 N. Field Street, Suite 1800 Dallas, TX 75201-4675 |
| intp | + | Wind Down Debtor, c/o Sarah Link Schultz, Akin Gump Strauss Hauer & Feld LLP, 2300 N. Field Street, Suite 1800, Dallas, TX 75201-4675 |

TOTAL: 4

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

# BYPASSED RECIPIENTS

**The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.**

| Recip ID | Bypass Reason | Name and Address |
|---|---|---|
| cr | | Midas Green Technologies LLC |

TOTAL: 1 Undeliverable, 0 Duplicate, 0 Out of date forwarding address

# NOTICE CERTIFICATION

**I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Oct 30, 2026 Signature: /s/Gustava Winters