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

In re:

RHODIUM ENCORE LLC, et al.,¹

Debtors.

Chapter 11

Case No. 24-90448 (ARP)

\$ \$ \$ \$ \$ \$ (Jointly Administered) §

NOTICE OF RULE 2004 DEPOSITION OF NICHOLAS CERASUOLO

PLEASE TAKE NOTICE THAT, pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Local Rule 2004-1 of the United States Bankruptcy Court for the Southern District of Texas (the "Local Rules"), the Ad Hoc Group ("AHG") of parties to Simple Agreements for Future Equity with Debtor Rhodium Enterprises, Inc. will take the oral deposition of Nicholas Cerasuolo on May 8, 2025, starting at 9:30 a.m. Central Time at the offices of Akin Gump Strauss Hauer & Feld LLP, 1111 Louisiana St. #44, Houston, TX 77002, or at such other date, time, and place as the parties may agree. The deposition will be recorded by stenographic means and may also be recorded by audio or audiovisual means and shall continue day-to-day until completed.

¹ Debtors in these chapter 11 cases and the last four digits of their corporate identification numbers are as follows: Rhodium Encore LLC (3974), Jordan HPC LLC (3683), Rhodium JV LLC (5323), Rhodium 2.0 LLC (1013), Rhodium 10MW LLC (4142), Rhodium 30MW LLC (0263), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), Rhodium Encore Sub LLC (1064), Rhodium Enterprises, Inc. (6290), Rhodium Industries LLC (4771), Rhodium Ready Ventures LLC (8618), Rhodium Renewables LLC (0748), Air HPC LLC (0387), Rhodium Renewables Sub LLC (9511), Rhodium Shared Services LLC (5868), and Rhodium Technologies LLC (3973). The mailing and service address of Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.



Dated: April 24, 2025

AKIN GUMP STRAUSS HAUER & FELD LLP

/s/ Sarah Link Schultz Sarah Link Schultz (State Bar No. 24033047; S.D. Tex. 30555) Elizabeth D. Scott (State Bar No. 24059699; S.D. Tex. 2255287) 2300 N. Field Street, Suite 1800 Dallas, TX 75201-2481 Telephone: (214) 969-2800 Email: sschultz@akingump.com Email: edscott@akingump.com

- and -

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Counsel to the Ad Hoc Group of SAFE Parties

CERTIFICATE OF CONFERENCE

I hereby certify that on April 21, 2025, counsel to the SAFE AHG conferred with counsel to Mr. Nicholas Cerasuolo, Mr. R.J. Shannon, regarding scheduling the date and time of the aforementioned deposition of Mr. Cerasuolo.

<u>/s/ Sarah Link Schultz</u> Sarah Link Schult Case 24-90448 Document 1011 Filed in TXSB on 04/24/25 Page 4 of 4

CERTIFICATE OF SERVICE

I hereby certify that on April 24, 2025, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

> <u>/s/ Sarah Link Schultz</u> Sarah Link Schultz