

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

In re: § Chapter 11
RHODIUM ENCORE LLC, *et al.*¹ § Case No. 24-90448 (ARP)
§ Debtors. § (Jointly Administered)

CROSS-NOTICE OF RULE 2004 DEPOSITION OF NATHAN NICHOLS

Cross the River LLC, Elysium Mining LLC, and Trine Mining, LLC, by and through the undersigned counsel, will take the oral deposition of **Nathan Nichols** on **May 14, 2025**, at **9:30 a.m. Central Time** at the offices of Munsch Hardt Kopf & Harr, P.C., 700 Milam Street, Suite 800, Houston, Texas 77002, or at such other location agreed upon by the Transcend Group and Cameron Blackmon.² Interested parties will have the option to attend and participate in the deposition via video conference (*i.e.*, remote means). Remote login instructions will be provided prior to the deposition. The deposition will be recorded by stenographic means and may also be recorded by audio, video, or audiovisual means and shall continue day-to-day until completed.

¹ The 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), Rhodium Enterprises, Inc. (6290), Rhodium Technologies LLC (3973), Rhodium Renewables LLC (0748), Air HPC LLC (0387), Rhodium Shared Services LLC (5868), Rhodium Ready Ventures LLC (8618), Rhodium Industries LLC (4771), Rhodium Encore Sub LLC (1064), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), and Rhodium Renewables Sub LLC (9511). The mailing and service address of the Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.



2490448250501000000000003

Cross the River LLC, Elysium Mining LLC, and Trine Mining, LLC incorporate by reference the scope of examination set forth in the Transcend Group's Amended Notice of Rule 2004 Deposition of Nathan Nichols filed on April 24, 2025 [Doc. 1014].

Dated: May 1, 2025

Respectfully submitted,

SBAITI & COMPANY, PLLC

/s/ Jonathan Bridges

Mazin A. Sbaiti

Texas Bar No. 24058096

Jonathan Bridges

Texas Bar No. 24028835

Griffin S. Rubin

Texas Bar No. 24121809

Dallas Arts Tower

2200 Ross Avenue, Suite 4900

Dallas, Texas 75201

T: (214) 432-2899

F: (214) 853-4367

E: mas@sbaitilaw.com

jeb@sbaitilaw.com

gsr@sbaitilaw.com

***COUNSEL FOR
TRINE MINING LLC, ELYSIUM
MINING LLC, and CROSS THE
RIVER LLC***

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that on May 1, 2025, a copy of the foregoing document was served on all parties registered to receive electronic notices of filings in this case via the Court's ECF notification system.

/s/ Jonathan Bridges

Jonathan Bridges