

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

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

**STIPULATION BETWEEN THE DEBTORS AND TRANSCEND
GROUP TO EXTEND THE RESPONSE DATE TO THE EMERGENCY MOTION**
(Relates to ECF No. 996)

Rhodium Encore LLC and each of its associated debtors and debtors in possession (the “Debtors” or “Rhodium”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) and Transcend Partners Legend Fund LLC, Valley High LP, GR Fairbairn Family Trust, Grant Fairbairn Revocable Trust, Nina Claire Fairbairn Revocable Trust, NCF Eagle Trust, GRF Tiger Trust, and NC Fairbairn Family Trust (together, the “Transcend Group,” and together with the Debtors, 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 and August 29, 2024 (the “Petition Dates”), the Debtors each commenced with this Court a voluntary case under title 11 of the United States Bankruptcy Code

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.



(the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Texas (the “Court”). The cases are jointly administered.

2. On April 19, 2025, the Transcend Group filed a Notice of Rule 2004 Deposition of Nicholas Cerasuolo (ECF No. 962), a Notice of Rule 2004 Deposition of Nathan Nichols (ECF No. 963), and a Notice of Rule 2004 Deposition of Chase Blackmon (ECF No. 964) (together, the “2004 Deposition Notices”).

3. On April 22, 2025, the Debtors filed an Emergency Motion to Quash the 2004 Deposition Notices (the “Emergency Motion”) (ECF No. 996). A hearing was scheduled for April 23, 2025, at 8:30 a.m. on the Emergency Motion.

4. During the April 23, 2025, hearing, the Court set a deadline of May 2, 2025, for the Transcend Group to file a response to the Emergency Motion.

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

1. The Parties have agreed to extend the Transcend Group’s deadline to file a response to May 5, 2025, at 12:00 p.m. (Central).

STIPULATED AND AGREED:

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

/s/ Patricia B. Tomasco

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