

ENTERED

May 14, 2025

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT
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)
	§	

**CORRECTED ORDER (I) SETTING BAR DATE FOR FILING PROOFS OF INTEREST,
(II) APPROVING THE FORM OF PROOFS OF INTEREST AND THE MANNER OF
FILING, (III) APPROVING NOTICE OF BAR DATE, AND
(IV) GRANTING RELATED RELIEF
(Relates to ECF No. 1055)**

Upon the motion (the “Motion”), of the above-captioned debtors (collectively, the “Debtors”),² for entry of an order (the “Order”) (i) establishing the Bar Date; (ii) approving the form of Proofs of Interest and the manner of filing; (iii) approving notice of the Bar Dates; and (iv) granting related relief, all as more fully set forth in the Motion; and this Court having jurisdiction to decide the Motion and to enter this Bar Date Order pursuant to 28 U.S.C. § 1334; and consideration of the Motion being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided, such notice being adequate and appropriate under the circumstances; and after notice and a hearing, as defined in section 102 of the Bankruptcy Code;

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.

² Capitalized terms not otherwise defined in this Order have the meaning ascribed to them in the Motion.



and this Court having determined that the legal and factual bases set forth in the Motion and in the record establish just cause for entry of this Order; and it appearing that entry of this Order is in the best interests of the Debtors' estates; it is hereby ORDERED that:

I. THE BAR DATE

1. Each entity³ that asserts an interest in the Debtors shall be required to file an original, written Proof of Interest (a "Proof of Interest") substantially in the form attached to this Order as **Exhibit 1** (the "Proof of Interest Form") or emailed directly to the Claims Agent at rhodiumpoiforms@veritaglobal.com.

2. All Proofs of Interest must be filed or submitted so as to be *actually received* by the Claims Agent on or before the Bar Date. If Proofs of Interest are not received by the Claims Agent on or before the Bar Date, except in the case of certain exceptions explicitly set forth herein, the holders of the underlying interest shall be barred from asserting such interest against the Debtors and precluded from voting on any plan filed in these Chapter 11 Cases and/or receiving distributions from the Debtors on account of such interest in these Chapter 11 Cases.

II. PROOFS OF INTEREST

A. Who Must File

3. The following categories of equity security holders, in the capacities described below, shall be required to file a Proof of Interest by the Bar Date:

- a. any entity whose equity security interest in the Debtors is not listed in the Second Amended Equity List;

³ Except as otherwise defined in this Order or in the Motion, all terms specifically defined in the Bankruptcy Code shall have those meanings ascribed to them by the Bankruptcy Code. In particular, as used herein: (a) the terms "equity security" and "equity security holder" have the meanings given to them in subsections 101(16) and 101(17) of the Bankruptcy Code; (b) the term "entity" (including individuals, partnerships, corporations, joint ventures, and trusts) has the meaning given to it in section 101(15) of the Bankruptcy Code; (c) the term "governmental unit" has the meaning given to it in section 101(27) of the Bankruptcy Code; and (d) the term "person" has the meaning given to it in section 101(41) of the Bankruptcy Code.

- b. any entity believing its equity security interest in the Debtors is incorrectly listed in the Second Amended Equity List;

4. The following categories of interest holders, in the capacities described below, shall not be required to file a Proof of Interest by the Bar Date:

- a. any entity on the Second Amended Equity List who agrees with the equity security amount set forth in the Second Amended Equity List;
- b. any entity that has already filed a signed Proof of Interest against the Debtors with the Claims Agent;
- c. any entity holding an interest for which a separate deadline is fixed by the Court;
- d. any entity holding an equity security interest that the Court exempts from filing a Proof of Interest; and
- e. Imperium Investments Holdings LLC, which is the sole holder of Class B stock in Rhodium Enterprises, Inc; and
- f. Any Debtor asserting an equity security interest in any other Debtor.

B. Procedures for Filing

5. The following requirements shall apply with respect to filing and preparing each Proof of Interest:

- a. *Form.* Each Proof of Interest must be filed with the Clerk of the United States Bankruptcy Court on the Proof of Interest form in substantially the form attached as **Exhibit 1** to the Order (the “Proof of Interest Form”) or emailed directly to the Claims Agent at rhodiumpoiforms@veritaglobal.com.
- b. *Signatures.* Only **original** proofs of interest are acceptable for purposes of the interests’ administration. Each Proof of Interest must be signed—in ink for a physical Proof of Interest or by electronic signature for an electronic Proof of Interest—by the interest holder or by an authorized agent or legal representative of the interest holder on the interest holder’s behalf.
- c. *Contents.* Each Proof of Interest must be written or printed in legible English. Each Proof of Interest must conform substantially to the Proof of Interest Form provided by the Debtors. Each Proof of Interest must include supporting documentation, except that, with written consent of Debtors’ counsel, a Proof of Interest may include a summary of voluminous

documentation. To the extent that voluminous documentation is summarized, the equity security holder shall transmit such documentation to counsel to the Debtors or any other party in interest within 5 business days upon request.

- d. *Delivery.* Each Proof of Interest must be filed, including supporting documentation, through one of the following methods: (i) emailed directly to the Claims Agent at rhodiumpoiforms@veritaglobal.com; (ii) by first class mail, overnight mail, or hand delivery, to the following address: Rhodium Claims Processing Center, c/o KCC dba Verita, 222 N. Pacific Coast Hwy., Ste. 300, El Segundo, CA 90245; (iii) by first class mail, overnight mail, or hand delivery, to the following address: United States Bankruptcy Court, P.O. Box 3900, Houston, Texas 77002; or (iv) by electronically filing through Pacer at <https://ecf.txsb.uscourts.gov>. Proofs of Interest submitted by fax or email other than to the designated Claims Agent's email address above will not be accepted. Equity Security holders who deliver a physical Proof of Interest to the Claims Agent or the United States Bankruptcy Court and wish to receive acknowledgement of the submission must also deliver to the Claims Agent or the Clerk of United States Bankruptcy Court a copy of the Proof of Interest Form (in addition to the original Proof of Interest Form) and a self-addressed stamped envelope.
- e. *Timing.* Each Proof of Interest must be delivered in the foregoing manner so that the Proof of Interest is ***actually received*** by the Claims Agent or the Clerk of the United States Bankruptcy Court on or before the applicable Bar Date.

C. Consequences of Failing to File

6. Any entity or person that is required to file a Proof of Interest, but fails to timely file such Proof of Interest on or before the Bar Date in accordance with the Order, shall be forever barred, estopped and enjoined from: (i) asserting the purported equity security interest in the Debtors or their property and estates (and from filing or amending a Proof of Interest to assert such equity interest); and (ii) voting on, or receiving any distribution relating pursuant to the purported equity security interest in the Debtors, under any chapter 11 plan in these Chapter 11 Cases. For the avoidance of doubt, nothing in this Order bars equity security holders of the Debtors that are listed in the Second Amended Equity List to vote on, or receive any distribution

under any chapter 11 plan in these Chapter 11 Cases based on their respective equity security interests scheduled in the Second Amended Equity List.

III. NOTICE PROCEDURES

A. Mailing of Bar Date Notices

7. The Debtors will cause written notice of the Bar Date to be mailed via first-class mail to the entities and persons listed below (or their respective counsel, if known). The notice will be in substantially the form attached to the Order as **Exhibit 2** (the “Bar Date Notice”) and will be accompanied by a Proof of Interest Form (together, the “Bar Date Package”).

- a. the U.S. Trustee;
- b. counsel to the Official Committee of Unsecured Creditors in this Chapter 11 Cases;
- c. all known equity security holders in the Debtors as of the date of entry of the Order, including all entities listed in the Second Amended Equity List;
- d. all entities that have requested notice of proceedings in these Chapter 11 Cases pursuant to Bankruptcy Rule 2002, as of the date of entry of the Order;
- e. all current and former employees (to the extent that contact information for former employees is available in the Debtors’ records); and
- f. all other entities listed on the Debtors’ matrix of creditors.

8. The proposed Bar Date Notice will notify parties of the Bar Date and will contain information about who must file a Proof of Interest, how to file a Proof of Interest, and the consequences of failing to properly file a valid and timely Proof of Interest.

9. The Debtors will also post the Bar Date Package on the Claims Agent’s website at <https://www.veritaglobal.net/rhodium>.

B. Supplemental Mailings

10. After the initial mailing of the Bar Date Package, the Debtors may, in their

discretion, make supplemental mailings of notices, including in the event that: (i) notices are returned by the post office with forwarding addresses;⁴ (ii) certain parties acting on behalf of parties in interest decline to distribute notices to these parties and instead return their names and addresses to the Debtors for direct mailing; and (iii) additional potential equity security holder become known to the Debtors. In this regard, the Debtors request that the Court permit the Debtors to make supplemental mailings of the Bar Date Package in these and similar circumstances at any time up to 14 days in advance of the Bar Date, with any such mailings being deemed timely and the Bar Date being applicable to the recipient interest holders.

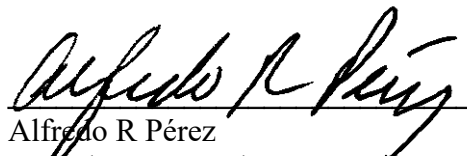
IV. MISCELLANEOUS ORDERS

11. Notwithstanding any provision of the Bankruptcy Rules or Local Rules, the terms of this Order shall be immediately effective and enforceable upon its entry.

12. The Debtors and their agents are authorized to take all steps necessary or appropriate to carry out this Order.

13. This Court shall retain jurisdiction over all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Signed: May 14, 2025


Alfredo R Pérez
United States Bankruptcy Judge

⁴ To the extent that any notices are returned as “return to sender” without a forwarding address, the Debtors request that they not be required to mail additional notices to such persons and that notice be deemed sufficient as to them.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS		PROOF OF INTEREST
Debtor: Rhodium Enterprises, Inc.		
Case No: 24-90454 (ARP)		
1. Name of holder of Interest (The person or entity holding an Interest in Debtor Rhodium Enterprises, Inc. referred to hereinafter as the "Interest Holder"):	<input type="checkbox"/> Check box if you are aware that anyone else has filed a proof of interest relating to your interest. Attach copy of statement giving particulars.	
Name and address where notices should be sent:	<input type="checkbox"/> Check box if you have never received any notices from the bankruptcy court or the Debtors in this case.	
Telephone Number	<input type="checkbox"/> Check box if this address differs from the address on the envelope sent to you by the Debtors.	
Email Address		THIS SPACE IS FOR COURT USE ONLY
NOTE: This form should ONLY be used to assert an Interest in Debtor Rhodium Enterprises, Inc. The term "Interest" or "equity interest" means any equity in Debtor Rhodium Enterprises, Inc. as defined in section 101(16) of the Bankruptcy Code, including all common stock, preferred stock, or other instruments evidencing an ownership interest, or equity security (as defined in section 101(16) of the Bankruptcy Code) in Rhodium Enterprises, Inc., whether or not transferable, and any restricted stock, warrant or right, contractual or otherwise, including, without limitation, equity-based employee incentives, grants, stock appreciation rights, performance shares/units, incentive awards, or other instruments issued to employees of the Debtors, to acquire any such interests in Debtor Rhodium Enterprises Inc.		
Account or other number by which Interest Holder identifies Debtor:	Check here if this Proof of Interest: <input type="checkbox"/> Replaces a previously filed Proof of Interest Dated: <input type="checkbox"/> Amends a previously filed Proof of Interest Dated:	
2. Date Interest was acquired:	3. Total Amount Paid for Interest:	
4. Certificate number(s):		
5. Type of Interest: Please indicate the type of Interest you hold:		
6. Supporting Documents: <i>Attach copies of supporting documents</i> , such as stock certificates, option agreements, warrants, etc. DO NOT SEND ORIGINAL DOCUMENTS. If the documents are not available, explain.		
7. Signature: I declare under penalty of perjury that the information provided in this proof of interest is true and correct to the best of my knowledge, information and reasonable belief.		THIS SPACE FOR COURT USE ONLY
DATE	SIGN and print the name and title, if any, of the Interest Holder or other person authorized to file this proof of interest (attach copy of power of attorney, if any):	

Penalty for presenting fraudulent claim is a fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 AND 3571

EXHIBIT 2

BAR DATE NOTICE

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

In re: RHODIUM ENCORE LLC, <i>et al.</i> , ¹ Debtors.	§ § § § § § §	Chapter 11 Case No. 24-90448 (ARP) (Jointly Administered)
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**NOTICE OF DEADLINE
FOR THE FILING OF PROOFS OF INTEREST**

To all persons and entities who may have interest against the Debtors:

PLEASE TAKE NOTICE THAT:

On August 24, 2024 and August 29, 2024 (the “Petition Date”), Rhodium Encore LLC, and certain of its affiliates, as debtors and debtors in possession (collectively, the “Debtors”), each filed a voluntary petition for relief under title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Texas (the “Court”).

On [•], 2025, the Court entered an order [ECF No. [•]] (the “Order”)² establishing certain dates by which parties holding equity interests in the Debtors must file Proofs of Interest (“Proofs of Interest”).

If you are a known or asserted holder of equity interest in the Debtors, the Debtors are attaching to this notice (this “Notice”) a proof of interest form (the “Proof of Interest Form”) to be used in these chapter 11 cases, which identifies on its face the amount, nature, and classification of your interest(s), if any, listed in the Debtors’ Second Amended Equity List.

As used in this Notice, the term “entity” has the meaning given to it in section 101(15) of the Bankruptcy Code, and includes all persons, estates, trusts, governmental units, and the Office of the United States Trustee for the Southern District of Texas. In addition, the terms “persons”

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² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Order.

and “governmental units” are defined in sections 101(41) and 101(27) of the Bankruptcy Code, respectively.

As used in this Notice, the term “equity interest” or “equity interests” means any equity in the Debtors as defined in section 101(16) of the Bankruptcy Code, including all common stock, preferred stock, or other instruments evidencing an ownership interest, or equity security (as defined in section 101(16) of the Bankruptcy Code) in the Debtors, whether or not transferable, and any restricted stock, warrant or right, contractual or otherwise, including, without limitation, equity-based employee incentives, grants, stock appreciation rights, performance shares/units, incentive awards, or other instruments issued to employees of the Debtors, to acquire any such interests in the Debtors.

I. THE BAR DATE

1. The Order establishes the following bar date for filing Proofs of Interest in these Chapter 11 Cases (the “Bar Date”):

- a. *Bar Date.* Pursuant to the Order, except as described below, all entities holding equity interests against the Debtors **are required to file Proofs of Interest by June 20, 2025, at 5:00 p.m. (Prevailing Central Time).**

II. WHO MUST FILE A PROOF OF INTEREST

2. Except as otherwise set forth herein, the following ***must*** file Proofs of Interest on or before the Bar Date:

- a. any entity whose equity interest in the Debtors is not listed in the Second Amended Equity List [ECF No. [•]];
- b. any entity asserting its equity interest in the Debtors is incorrectly listed in the Second Amended Equity List;
- c. any entity whose equity interest in the Debtors is listed as contingent in the Second Amended Equity List.

III. PARTIES WHO DO NOT NEED TO FILE PROOFS OF INTEREST BY THE BAR DATE

3. Subject to further order of the Court, the following entities holding equity interests that would otherwise be subject to the Bar Date, in the capacities described below, need not file Proofs of Interest:

- a. any entity on the Second Amended Equity List who agrees with the equity interest set forth in the Second Amended Equity List;

- b. any entity that has already filed a signed Proof of Interest against the Debtors with the Claims Agent ;
- c. any entity holding an equity interest for which a separate deadline is fixed by the Court;
- d. any entity holding an equity interest that the Court exempts from filing a Proof of Interest;
- e. Imperium Investments Holdings LLC, which is the sole holder of Class B stock in Rhodium Enterprises, Inc.; and
- f. Any Debtor asserting an equity security interest in any other Debtor.

IV. INSTRUCTIONS FOR FILING PROOFS OF INTEREST

4. The following requirements shall apply with respect to filing and preparing each Proof of Interest.

- a. *Form.* Each Proof of Interest must be filed with the Clerk of the United States Bankruptcy Court on the Proof of Interest form in substantially the form attached as **Exhibit 1** to the Order (the “Proof of Interest Form”) or emailed directly to the Claims Agent at rhodumpoiforms@veritaglobal.com.
- b. *Signatures.* Only **original** Proofs of Interest are acceptable for purposes of the interests’ administration. Each Proof of Interest must be signed—in ink for a physical Proof of Interest or by electronic signature for an electronic Proof of Interest—by the equity interest holder or by an authorized agent or legal representative of the equity interest holder on behalf of the equity interest holder.
- c. *Contents.* Each Proof of Interest must be written or printed in legible English. Each Proof of Interest must conform substantially to the Proof of Interest Form provided by the Debtors. Each Proof of Interest must include supporting documentation, except that, with written consent of Debtors’ counsel, a Proof of Interest may include a summary of voluminous documentation. To the extent that voluminous documentation is summarized, the equity interest holder shall transmit such documentation to counsel to the Debtors or any other party in interest within 5 business days upon request.
- d. *Delivery.* Each Proof of Interest must be filed, including supporting documentation, through one of the following methods: (i) email directly to the Claims Agent at rhodumpoiforms@veritaglobal.com; (ii) by first

class mail, overnight mail, or hand delivery, to the following address: Rhodium Claims Processing Center, c/o KCC dba Verita, 222 N. Pacific Coast Hwy., Ste. 300, El Segundo, CA 90245; (iii) by first class mail, overnight mail, or hand delivery, to the following address: United States Bankruptcy Court, P.O. Box 3900, Houston, Texas 77002; or (iv) by electronically filing through Pacer at <https://ecf.txsb.uscourts.gov>. Proofs of Interest submitted by fax or email other than to the designated Claims Agent's email address above will not be accepted. Equity interest holders who deliver a physical Proof of Interest to the Claims Agent or the United States Bankruptcy Court and wish to receive acknowledgement of the submission must also deliver to the Claims Agent or the Clerk of United States Bankruptcy Court a copy of the Proof of Interest Form (in addition to the original Proof of Interest Form) and a self-addressed stamped envelope.

- e. *Timing.* Each Proof of Interest must be delivered in the foregoing manner so that the Proof of Interest is ***actually received*** by the Claims Agent or the Clerk of the United States Bankruptcy Court on or before the Bar Date.

V. CONSEQUENCES OF FAILING TO TIMELY FILE YOUR PROOF OF INTEREST

5. Pursuant to the Order, if you are required to file a Proof of Interest but fail to file a timely Proof of Interest in accordance with the Order with respect to any interests:

- a. **you will be forever barred, estopped and enjoined from asserting your equity interest against the Debtors (or filing a Proof of Interest with respect to your Interest);**
- b. **the Debtors and their property will be forever discharged from any and all indebtedness or liability with respect to or arising from your equity interest;**
- c. **you will not receive any distribution in these Chapter 11 Cases on account of your equity interest; and**

you will not be permitted to vote on any plan or plans an account of your equity interest.

VI. RESERVATION OF RIGHTS

6. Nothing contained in this Notice is intended to or should be construed as a waiver of the Debtors' right to (i) dispute, or assert offsets or defenses against, any submitted proof of claim or Proof of Interest or any claim listed or reflected in the Debtors' schedules as to the nature,

amount, liability, or classification thereof; (ii) subsequently designate any scheduled claim or as disputed, contingent, or unliquidated; and (iii) otherwise amend or supplement the schedules.

VII. ADDITIONAL INFORMATION

7. If you rely on the Second Amended Equity List, it is your responsibility to determine that the interest is accurately listed in the Second Amended Equity List. Copies of the Debtors' Second Amended Equity List, the Order, the Debtors' schedules, and other information regarding these Chapter 11 Cases are available for inspection free of charge on the Debtors' website at <https://www.veritaglobal.net/rhodium/>. The Second Amended Equity List and other filings in these Chapter 11 Cases also are available for a fee at the Court's website at <https://ecf.txsb.uscourts.gov/>. A login identification and password to the Court's Public Access to Court Electronic Records ("PACER") are required to access this information and can be obtained through the PACER Service Center at <http://www.pacer.psc.uscourts.gov>. Copies of the Second Amended Equity List and other documents filed in these cases may also be examined between the hours of 8:00 a.m. and 5:00 p.m., Prevailing Central Time, Monday through Friday, at the office of the Clerk of the Bankruptcy Court, United States Bankruptcy Court for the Southern District of Texas, 515 Rusk Avenue, 5th Floor, Houston, Texas 77002.

8. If you require additional information regarding the filing of a Proof of Interest, you may contact the Debtors' restructuring hotline at 888-733-1541 (U.S./Canada toll-free) or +1-310-751-2637 (International) or submit an inquiry online at <http://www.veritaglobal.net/rhodium/inquiry>.

A HOLDER OF A POSSIBLE EQUITY INTEREST AGAINST THE DEBTORS SHOULD CONSULT AN ATTORNEY REGARDING ANY MATTERS NOT COVERED BY THIS NOTICE, SUCH AS WHETHER THE HOLDER SHOULD FILE A PROOF OF INTEREST.

Dated: May __, 2025,

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

/s/ Patricia B. Tomasco

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***Counsel to the Debtors and
Debtors-In-Possession***