

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

In re:

RHODIUM ENCORE LLC, *et al.*,¹

Debtors.

Bankruptcy Court for The
Southern District of Texas
Chapter 11
Case No. 24-90448 (ARP)
(Jointly Administered)

**IMPERIUM PARTIES' RESPONSE TO EMERGENCY MOTION OF
THE SAFE AHG TO COMPEL PRODUCTION**

Imperium Investment Holdings LLC, Chase Blackmon, Cameron Blackmon, and Nathan Nichols (the "Imperium Parties") hereby file this Response to the *Emergency Motion of the SAFE AHG to Compel Production by Imperium Parties and Debtors* (the "Motion to Compel") [ECF 1079/1080], and, in support, respectfully state as follows:

I. INTRODUCTION

1. In these bankruptcy cases, the SAFE AHG has attempted to bully everyone in a strategy to force capitulation by all parties (including Debtors and the Special Committee) and to obscure the weakness of its alleged "claims." The SAFE AHG has continually tried to usurp the authority of the special committee (the "Special Committee") appointed by the board of directors of Rhodium Enterprises Inc. ("REI") to investigate potential claims against the current and former directors and officers of REI (the "D&Os"). Despite an exhaustive investigation by the Special

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) (collectively, "Debtors"). The mailing and service address of the Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005. *In re Rhodium Encore, et al.*, Case No. 24-90448 (ARP) (Bankr. S.D. Tex. filed August 24, 2024 and August 29, 2024) (the "Chapter 11 Cases")



Committee that cost the Debtors' estates well more than \$2 million, the SAFE AHG wants to subject the Imperium Parties to duplicative discovery for no reason other than to harass the D&Os to attempt to gain leverage in negotiations where its actual contractual position is extremely weak.

2. The Special Committee, the Debtors, and Imperium combined have produced almost 100,000 documents to the SAFE AHG. Yet, the SAFE AHG wants *more*. However, it is apparent the SAFE AHG is not really interested in more *documents*, but instead wants more *inconvenience*, more *harassment*, and more *leverage*. The Court should deny the SAFE AHG's Motion to Compel, and, to the extent necessary, enter a protective order that puts an end to the SAFE AHG's litigation extremism.

3. The Imperium Parties incorporate by reference as if fully set forth herein the Debtors' *Opposition to Motion to Compel and Emergency Motion for a Protective Order Regarding Requests for Production of Documents from Ad Hoc Group of SAFE Parties* [ECF 1113].

II. ARGUMENT

A. The SAFE AHG is not entitled to emergency relief.

4. On May 12, 2025, the SAFE AHG filed its Motion to Compel on an emergency basis seeking relief no later than May 21, 2025, citing the "ongoing depositions and global settlement-related discussions" as the reason for emergency consideration. However, as of May 12, the SAFE AHG and other parties had scheduled the depositions of Chase Blackmon, Nathan Nichols, and Cameron Blackmon for May 13, 14, and 16 – before the date by which the SAFE AHG requested emergency relief. Therefore, the depositions could not have been the reason for the emergency at the time the SAFE AHG filed the Motion to Compel. The depositions of Chase Blackmon (May 13) and Cameron Blackmon (May 16) were subsequently postponed. The deposition of Nathan Nichols occurred May 19, and the deposition of Nick Cerasoulo is scheduled

for May 23. Additionally, Debtors' plan of reorganization will most likely be filed this week. Once the plan is filed, there may be contested issues that warrant further discovery. However, such discovery, even if proper (which it is not), is premature at this time. Therefore, there are no ongoing issues that warrant emergency consideration.

B. The SAFE AHG is not entitled to the documents it seeks from the Imperium Parties.

5. In an ineffective performance, the Motion to Compel includes pages and pages of baseless allegations against the Imperium Parties for no apparent reason other than an attempt to intimidate or embarrass them and gain leverage. The claims do not belong to the SAFE AHG or any other creditor or equity holder. The claims belong to the Debtors' estate. The Special Committee thoroughly investigated each and every allegation hurled by the SAFE AHG and made an independent determination about which claims were colorable and which were baseless, and it will determine how to handle any potential claims as part of the plan process.

6. The Proposed Order Granting the Emergency Motion of the SAFE AHG to Compel Production by Imperium Parties and Debtors [ECF 1080-25] provides the only semi-clear statement as to what the SAFE AHG actually seeks from the Imperium Parties.

- a. the entirety of the Imperium Special Committee Production, including any document that Imperium has withheld, or would withhold, from the SAFE AHG on alleged grounds of privilege, or, in the alternative,
- b. the entirety of the Special Committee Production Subset, including any document that Imperium has withheld, or would withhold, from the SAFE AHG on alleged grounds of privilege.

7. The SAFE AHG also seeks an order requiring the Imperium Parties to remove the Professional Eyes Only ("PEO") designation from the Imperium Parties' tax returns. Each of these requests should be denied.

i. **The SAFE AHG is not entitled to discovery of the “Imperium Special Committee Production.”**

8. The Imperium Parties are the founders of the Rhodium business enterprise (“Rhodium”) and are or were members of the REI board of directors. They had email accounts with both Rhodium and Imperium domains. In the early days of the business, the Imperium Parties, intentionally or by accident, conducted some Rhodium business through their Imperium email accounts. However, they also conducted non-Rhodium business, including personal matters, through Imperium emails.

9. Debtors and the Special Committee obviously had access to all emails the Imperium Parties sent or received through their Rhodium email accounts. After the Petition Date, the Debtors realized that there were emails belonging to Debtors housed only on Imperium servers. Therefore, the Debtors and the Special Committee requested full access to the Imperium Parties’ Imperium emails. Because the Imperium email accounts included nearly 300,000 emails, the majority of which (1) were already in Debtors’ possession (because a person with a Rhodium email was a participant), (2) were unrelated to Rhodium, and/or (3) contained personal and confidential information, the Imperium Parties were unwilling to provide full access to the Special Committee. Ultimately, the Imperium Parties and the Special Committee agreed on certain search terms in an effort cull the volume of emails to something more manageable. Still, the emails identified by the search terms faced the same relevance obstacles.

10. Wanting to fully cooperate with the Special Committee’s investigation and because of constraints on time and manpower, the Imperium Parties agreed to provide the Special Committee with almost all of the documents collected using the search terms. *See* Email dated January 9, 2025, attached as **Exhibit A**. The Imperium Parties provided more than 17,000 documents to the Special Committee subject to an agreement that the Special Committee would

not share the documents with any person or party without the Imperium Parties' express consent. The Imperium Parties made clear to the Special Committee that the majority of the documents were likely irrelevant and should be destroyed or returned if unrelated to Rhodium business. The Imperium Parties also reserved any claims of privilege.

11. The Motion to Compel is unclear as to whether the SAFE AHG seeks production of all documents the Imperium Parties provided to the Special Committee or just the privileged documents it withheld from its production to the SAFE AHG. To the extent the SAFE AHG wants all documents provided to the Special Committee, that is beyond the bounds of reason.

ii. Personal Tax Returns are highly confidential, and PEO designation should remain.

12. The SAFE AHG and other overly aggressive disgruntled investors allege that the Imperium Parties improperly used Rhodium assets to pay their personal capital gains tax liabilities. While investigating this claim, Special Committee requested copies of the Imperium Parties' tax returns for certain years. The Imperium Parties provided the returns subject to a Highly Confidential and PEO designation and instructed the Special Committee not to share the returns with any other parties. The SAFE AHG subsequently demanded access to the tax returns. To entice the Imperium Parties to turn over the tax returns, the SAFE AHG assured the Imperium Parties that the returns would subject to the *Stipulated Protective Order* [ECF 152] and adequately protected with a PEO designation. *See* Compilation of Email Excerpts, attached as **Exhibit B**. The Imperium Parties ultimately agreed at the insistence of the Debtors and the Special Committee. After winning that battle, the SAFE AHG now wants to go back on its word and demands that the Imperium Parties remove the PEO designation (without even stating a legitimate reason for the request).

13. The SAFE AHG asserts that the tax returns “do not constitute trade secrets or confidential research development or commercial information nor defamatory matter, and do not warrant the undue restriction associated with a Professional Eyes’ Only designation.” However, the SAFE AHG omits an important portion of the PEO definition:

Material that contains Confidential Information that a Designating Party reasonably and in good faith believes constitutes and/or contains **non-public, highly sensitive** and/or strictly proprietary information of a Party, including but not limited to trade secrets, current or future business and/or current or future plans for products or services, third-party agreements and their terms, employment agreements and their terms, customer lists, trading or investment strategies, or other financial information that would be likely to cause harm to a Party’s competitive position if disclosed outside the Contested Matter.

14. Clearly, the tax returns contain “non-public, highly sensitive” information.² The Imperium Parties do not consent to the release of their personal tax returns to non-professionals.

III. CONCLUSION

15. The SAFE AHG’s discovery is not truly aimed at examining a proposed reorganization, but rather aimed at bullying all other parties to achieve a goal. The SAFE AHG, undisclosed incentives and avowed deep pockets, is not going to stop the scorched earth tactics until forced to do so. The Debtors’ estates have borne the expense of a thorough investigation, the Imperium Parties have cooperated with that investigation, produced documents, sat for interviews, and agreed to Rule 2004 examinations. This is simply litigation through intimidation and benefits no one.

² The Fifth Circuit has recognized that income tax returns are highly sensitive documents, and courts are reluctant to order their routine disclosure as a part of discovery. *Nat. Gas Pipeline Co. of Am. v. Energy Gathering, Inc.*, 2 F.3d 1397, 1411 (5th Cir. 1993)(Further reasoning that “[n]ot only are the taxpayer's privacy concerns at stake, but unanticipated disclosure also threatens the effective administration of our federal tax laws given the self-reporting, self-assessing character of the income tax system.”).

16. Therefore, the Imperium Parties request that the Court deny the SAFE AHG's Motion to Compel, and, to the extent necessary, enter a order protecting the Imperium Parties from the discovery sought by the SAFE AHG.

Dated: May 20, 2025

Respectfully submitted,

By: /s/ Rhonda Mates
Stephen W. Lemmon
Texas Bar No. 12194500
Rhonda Mates
Texas Bar No. 24040491
STREUSAND, LANDON, OZBURN
& LEMMON, LLP
1801 S. Mopac Expressway, Ste. 320
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mates@slollp.com

*Attorneys for Defendants
Imperium Investment Holdings, LLC,
Nathan Nichols, Chase Blackmon, and
Cameron Blackmon*

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing instrument has been served on this 20th day of May 2025, served via this Court's CM/ECF notification system to those parties registered for service.

/s/ Rhonda Mates
Rhonda Mates

EXHIBIT A

From: Rhonda Mates <mates@slollp.com>

Sent: Thursday, January 9, 2025 4:43 PM

To: Schmeltz, Trace <TSchmeltz@btlaw.com>; pattytomasco@quinnemanuel.com
<pattytomasco@quinnemanuel.com>

Cc: Stephen Lemmon <lemmon@slollp.com>; Underwood, Charlotte
<Charlotte.Underwood@btlaw.com>

Subject: Imperium documents

Trace and Patty,

I am sending this email to you both at the same time since Patty (on behalf of Rhodium) has requested a copy of all documents we produce to the special committee. After consulting with Steve and our clients, we have some conditions we need to impose on the production of documents. These conditions should enable us to produce things more quickly (while making us tremendously unpopular). As used below, "Imperium" shall refer to Imperium, Chase Blackmon, Cameron Blackmon, and Nathan Nichols.

We need both Rhodium and the special committee to agree as follows:

- All documents will be considered attorneys eyes only.
- No documents can be shared with anyone outside of Rhodium and the special committee without Imperium's express consent.
- The special committee must get Imperium's authorization to use any document in its report or elsewhere.
- All documents, except those Imperium has given express permission to share, shall be returned to Imperium or destroyed at the conclusion of the investigation.
- If Rhodium or the special committee receives a subpoena or other document request, you must immediately notify both Steve and me. You are instructed to NOT produce the documents prior to any deadline and to allow Imperium an opportunity to object to the request. (Obviously, we are not asking you to ignore any obligations you have under the law, but just give us a chance to object prior to the deadline for production.)

We are not trying to obstruct the special committee's investigation. However, in order for us to feel comfortable producing documents with only a cursory review, we need these assurances and protections.

Thanks,

Rhonda Mates

STREUSAND | LANDON | OZBURN | LEMMON LLP

Spyglass Point | 1801 S. MoPac Expressway | Suite 320 | Austin, Texas 78739

(d) (512) 220-2689 | (o) (512) 236-9900 | (f) (512) 236-9904

mates@slollp.com | www.slollp.com

EXHIBIT B
EMAIL EXCERPTS

From: Hurley, Mitchell <mhurley@AkinGump.com>
Sent: Friday, January 31, 2025 9:43:59 AM
To: Schmeltz, Trace <TSchmeltz@btlaw.com>
Cc: Scott, Elizabeth D. <EDScott@AKINGUMP.com>; Underwood, Charlotte <Charlotte.Underwood@btlaw.com>
Subject: [EXTERNAL] Your voicemail

Trace – I got your voicemail last night.

...

Regarding the tax returns, you advised in your voicemail that you have copies of the tax returns in your possession. We understand that you intend to review them today, and that based on your review you will make a recommendation as to whether they should be provided to the SAFE AHG.

Respectfully, we continue to believe the returns should be produced to us immediately. They are of unquestionable relevance to the allegation that the insiders “embezzled” money from Rhodium to pay their personal tax liabilities, the protective order includes a “professional eyes only” designation (for documents that warrant such treatment), and the SAFE AHG is entitled to draw its own conclusion as to their significance. We see no reasonable justification for withholding these materials, which we first requested months ago.

From: Cameron Blackmon <cameronblackmon@imperiumholdings.io>
Sent: Friday, January 31, 2025 3:36 PM
To: Rhonda Mates <mates@slollp.com>; Casey Prostko <caseyprostko@imperiumholdings.io>; Chase Blackmon <chaseblackmon@imperiumholdings.io>; Nathan Nichols <nathannichols@imperiumholdings.io>; Stephen Lemmon <lemmon@slollp.com>
Subject: Re: In re Rhodium Encore, LLC, et al., Case No. 24-90448 (ARP) (Bankr. S.D. Tex.): Rule 2004 Examination - [Privileged and Confidential]

Just got off with Michael. They had their call with Akin. Both Sarah and Mitch were on the phone as well as Patty and Michael. According to Michael, it was a productive call - much more productive than previous calls.

In short, the immediate 2004 threat seems to be diffused *for now*, however:

1. He stated that he was not going to agree to the stipulation of "view only" access. He wants to download them so he can use them in a way that he would normally deal with them in a 2004 discovery, with the understanding that they will be subject to the protective order (which my understanding is that it is very strong in bankruptcy) and Professional/Attorney eyes only.

...

I believe we just need do it but **make it clear that those items are subject to the protective order and are professional's eyes only.** We keep it on Sharefile with the watermark and all that so if anything happens with those documents, Akin will be in clear violation of the protective order - which I'm sure they do not want.

From: Michael Robinson <mrobinson@provincefirm.com>
Sent: Friday, January 31, 2025 4:57 PM
To: Chase Blackmon <chaseblackmon@RHDM.com>; Cameron Blackmon <cameronblackmon@RHDM.com>; Nathan Nichols <nathannichols@RHDM.com>
Cc: pattytomasco@quinnemanuel.com <pattytomasco@quinnemanuel.com>
Subject: Akin

All,

In my discussion with Akin today they requested that the tax returns be provided subject to professional eyes only and the protective order. They requested that these tax returns not be limited to a time frame and that they have the ability to download these documents. I expressed to Mitch that I would talk to you about this request. He said he would hold on any further action and he would respond to Rhonda's email stating that he had received her emails..

From: Rhonda Mates
Sent: Friday, January 31, 2025 7:35 PM
To: mrobinson@provincefirm.com <mrobinson@provincefirm.com>
Cc: Chase Blackmon <chaseblackmon@imperiumholdings.io>; Cameron Blackmon <cameronblackmon@imperiumholdings.io>
Subject: Imperium Tax Returns

Michael,

[@Chase Blackmon](#) and [@Cameron Blackmon](#) have filled me in on your conversations, and on your reported communications with the Akin team regarding the personal tax returns of the Imperium principals. As you know Nathan is out of the country, and we have not been able to talk to him this afternoon. Therefore, I do not yet have authority beyond what was agreed to this morning. Using this link, Akin can access read-only versions of the tax returns, **with the understanding they are subject to the Protective Order in place in the bankruptcy case and are designated "Highly Confidential – Professionals' Eyes Only."** <https://slollp.sharefile.com/d-s4547ca7d0c6e40dfaa47982a556db4ac>

...

From: Hurley, Mitchell <mhurley@AkinGump.com>

Sent: Saturday, February 1, 2025 12:17 PM

To: Rhonda Mates <mates@slollp.com>

Cc: Stephen Lemmon <lemmon@slollp.com>; Schmeltz, Trace <TSchmeltz@btlaw.com>; pattytomasco@quinnemanuel.com <pattytomasco@quinnemanuel.com>; mrobinson@provincefirm.com <mrobinson@provincefirm.com>; Schultz, Sarah A. <sschultz@AkinGump.com>; Scott, Elizabeth D. <EDScott@AKINGUMP.com>

Subject: RE: In re Rhodium Encore, LLC, et al., Case No. 24-90448 (ARP) (Bankr. S.D. Tex.): Rule 2004 Examination

Rhonda:

...

Regarding your proposal concerning the tax returns, we have no objection to Imperium and its personnel providing that material on an attorneys' eyes only basis pursuant to the existing protective order. We do not agree to the "read only" limitation you propose, nor your proposal to allow us access to the produced documents for one week only. As you know, Imperium and its insiders have been alleged to have caused Rhodium to pay their personal tax liabilities, an allegation that other parties in interest in these cases have publicly characterized as "embezzlement." To be clear, the SAFE AHG is still investigating, and has not yet reached a final conclusion concerning the tax-related claims. But we will need continuing access to the tax returns and related information as that investigation continues in the coming weeks or months. We hope you will agree to turn them over to us voluntarily, and pursuant to the terms of the existing protective order.

From: Michael Robinson <mrobinson@provincefirm.com>

Sent: Saturday, February 1, 2025 8:09 PM

To: Nathan Nichols <nathannichols@RHDM.com>

Subject Tax Returns

Nathan,

Per our chat today, Akin is requesting to have full downloadable access to the tax returns, which would be subject to professional eyes only as well as the protective order. They would also like to be included in Chase's interview. Sarah has represented to David Dunn verbally that they would not be filing a 2004 at this time if this information is provided shortly.

From: Hurley, Mitchell <mhurley@AkinGump.com>

Sent: Sunday, February 2, 2025 7:55 PM

To: Rhonda Mates <mates@slollp.com>; Schultz, Sarah A. <sschultz@AkinGump.com>

Cc: Schmeltz, Trace <TSchmeltz@btlaw.com>; Michael Robinson

<mrobinson@provincefirm.com>; pattytomasco@quinnemanuel.com; Stephen Lemmon
<lemmon@slollp.com>; Underwood, Charlotte <Charlotte.Underwood@btlaw.com>
Subject: 2004-1 Discovery

...

Relatedly, at 1:02 p.m. Eastern time today you sent us a link, which you describe as “the downloadable tax returns for Imperium (2021), Chase Blackmon, Cameron Blackmon, and Nathan Nichols.” Thanks. However, we have not opened the link (or the link Barnes sent yesterday) because previously you conditioned our access to tax returns on us agreeing to “view only” access, and for one week only. As you know, those conditions are not acceptable to the SAFE AHG. In your email, you describe the linked documents as “downloadable.” Would you please confirm that means Imperium has dropped the conditions it previously imposed on production of tax returns, and that the SAFE AHG will be able to download, save, and keep (on an AEO basis as provided under the protective order) whatever documents are found at the link provided? We will wait to hear from you before accessing the link to be sure we have a meeting of the minds on this point. Also, is the tax information provided with the link limited to only 2021, as your cover email appears to indicate? Please let us know. Thanks in advance.

...

From: Michael Robinson <mrobinson@provincefirm.com>
Sent: Wednesday, February 5, 2025 2:20 PM
To: Schultz, Sarah A. <sschultz@AkinGump.com>; Patty Tomasco
<pattytomasco@quinnemanuel.com>; Schmeltz, Trace <TSchmeltz@btlaw.com>; David Dunn
<ddunn@provincefirm.com>; David Eaton <deatondirector@gmail.com>
Cc: Hurley, Mitchell <mhurley@AkinGump.com>
Subject: RE: SAFE AHG Discussion

Please find below the response to your requests in green, which you have stated would pause your 2004 requests with respect to Imperium and the Debtors.

...

(vi) Imperium to confirm that the tax returns produced by link on February 2 may both be viewed and downloaded by the SAFE AHG. Yes on PEO basis, subject to the protective order.

From: Hurley, Mitchell <mhurley@AkinGump.com>
Sent: Thursday, February 6, 2025 9:30 AM
To: Michael Robinson <mrobinson@provincefirm.com>; David Dunn <ddunn@provincefirm.com>; Patty Tomasco <pattytomasco@quinnemanuel.com>; Schmeltz, Trace <TSchmeltz@btlaw.com>; David Eaton <deatondirector@gmail.com>
Cc: Schultz, Sarah A. <sschultz@AkinGump.com>
Subject: FW: Discovery compromise

Michael, thanks. We have an agreement, subject to our clarifications underlined in red below. ... Please confirm we have sign off from all parties/law firms. Thanks.

(vi) Imperium to confirm that the tax returns produced by link on February 2 may both be viewed and downloaded by the SAFE AHG. **Yes on PEO basis, subject to the protective order. For the avoidance of doubt, produced tax returns shall include returns relating to any year in which private sales occurred, it was unclear based on Rhonda's email whether Imperium linked only tax returns for 2021.**

From: Michael Robinson <mrobinson@provincefirm.com>

Sent: Thursday, February 6, 2025 1:09 PM

To: Hurley, Mitchell <mhurley@AkinGump.com>; David Dunn <ddunn@provincefirm.com>; Patty Tomasco <pattytomasco@quinnemanuel.com>; Schmeltz, Trace <TSchmeltz@btlaw.com>; David Eaton <deatondirector@gmail.com>; Stephen Lemmon <lemmon@slollp.com>; Rhonda Mates <mates@slollp.com>

Cc: Schultz, Sarah A. <sschultz@AkinGump.com>

Subject: RE: Discovery compromise

Mitch,

I confirm we have sign-off from the referenced parties/law firms on this chain.

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

In re:

RHODIUM ENCORE LLC, *et al.*,¹

Debtors.

Bankruptcy Court for The
Southern District of Texas
Chapter 11
Case No. 24-90448 (ARP)
(Jointly Administered)

ORDER DENYING SAFE AHG'S MOTION TO COMPEL

Upon consideration of the Emergency Motion of the SAFE AHG to Compel Production by Imperium Parties and Debtors (the “Motion to Compel”) [ECF 1079/1080], the Imperium Parties’ Response, the responses and replies filed by other parties, and arguments and evidence presented, the Court having jurisdiction to consider this matter and relief requested therein pursuant to 28 U.S.C. § 1334; consideration of this Motion being a core proceeding pursuant to 28 U.S.C. § 157; notice of the Motion having been adequate and appropriate under the circumstances; and after due deliberation and sufficient cause appearing; it is hereby:

1. ORDERED that the Motion to Compel is DENIED.
2. ORDERED that, absent further order of the Court, the Imperium Parties have no obligation to produce the “Imperium Special Committee Production” as defined in the Motion to Compel.

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) (collectively, “Debtors”). The mailing and service address of the Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005. *In re Rhodium Encore, et al.*, Case No. 24-90448 (ARP) (Bankr. S.D. Tex. filed August 24, 2024 and August 29, 2024) (the “Chapter 11 Cases”)

3. ORDERED that the tax returns produced by the Imperium Parties shall maintain the Professional Eyes Only designated pursuant to the Stipulated Protective Order [ECF 152].

DATED:

ALFREDO R. PEREZ
UNITED STATES BANKRUPTCY JUDGE