

**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)
	§	

DOCUMENT REQUEST TO AD HOC GROUP OF SAFE PARTIES

To:

Ad Hoc Group of SAFE Parties
c/o Sarah Link Schultz
Elizabeth D. Scott
Akin Gump Strauss Hauer & Feld LLP
2300 N. Field Street, Suite 1800
Dallas, TX 75201-2481

c/o Mitchell P. Hurley
Akin Gump Strauss Hauer & Feld LLP
One Bryant Park
New York, NY 10036-6745

NOTICE IS HEREBY GIVEN that, pursuant to Federal Rules of Bankruptcy Procedure 2004, 7034, and 9014 and Bankruptcy Local Rule 2004-1, the above-captioned Debtors, by and through undersigned counsel, direct each member of the Ad Hoc Group of SAFE Parties (“SAFE AHG”) to produce the documents described in **Schedule A** hereto at the office of Quinn Emanuel

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.



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Urquhart & Sullivan, LLP, 700 Louisiana Street, Suite 3900, Houston, Texas 77002, Attn: Patricia B. Tomasco on or before June 20, 2025.

Respectfully submitted this 10th day of June 2025.

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

/s/ Patricia B. Tomasco
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*Counsel to the Debtors and
Debtors-In-Possession*

SCHEDULE A

DOCUMENT REQUESTS PURSUANT TO FED. R. BANKR. P. 2004

DEFINITIONS

1. “Communication” means the transmission of information (in the form of facts, ideas, inquires, or otherwise) by any means, including, but not limited to, any meeting, conversation, discussion, conference, correspondence, message, instant message (including, but not limited to, Bloomberg, Facebook, Instagram, WhatsApp, Gchat, or iMessage), text message or other written or oral transmission, exchange or transfer of information in any form between two or more Persons, including in person or by telephone, facsimile, telegraph, telex, letter, email, or other medium.

2. “Concerning” or “concerns” includes, but is not limited to, the following meanings: relating to, referring to, pertaining to, regarding, constituting, discussing, mentioning, containing, reflecting, evidencing, explaining, illustrating, analyzing, describing, displaying, showing, and identifying.

3. “Debtor” or “Debtors” means any of the debtors in the above-captioned chapter 11 cases.

4. “Document” shall have the broadest meaning possible including, but not limited to, all originals, non-identical copies and drafts of any written, printed, handwritten, recorded or graphic matter of any kind, however produced or reproduced, and regardless of where located, including, but not limited to, any work paper, correspondence, memorandum, note, research, checklist, opinion, minutes, inter-office or intra-office communications, email message, instant message (including, but not limited to, Bloomberg, Facebook, Instagram, WhatsApp, Gchat or iMessage), text message, report, chart, graph, summary, index, diary, electronic calendar, desk or

pocket calendar, notebook, any magnetic or other recording tape, computer data (including information or programs stored in a computer, whether or not ever printed or displayed), photograph, microfiche, microfilm, videotape, record or motion picture, and electronic, mechanical or electrical record or representation of any kind, including, but not limited to, tape, cassette, disc, magnetic card, or recording. “Document” shall also mean any document related to a Communication. “Document” shall further include the file folders in which said documents are maintained, any table of contents or index thereto, any removable “post-it” notes or attachments or exhibits to any of the foregoing, and copies of documents of which the originals have been destroyed pursuant to a document destruction policy or otherwise.

5. “Entity” shall mean any sole proprietorship, corporation, partnership, company, or other organization, whether formal or not, whether for profit or not, and all variations thereof, including, but not limited to, limited liability companies, limited partnerships, limited liability partnerships, limited liability limited partnerships, statutory trusts, joint ventures, professional corporations, or professional limited liability companies.

6. “Person” shall mean, without limitation, any natural person, Entity, governmental body or agency, and all past and present members, managing members, limited partners, officers, directors, managers, employees and agents, along with all other acting or purporting to act on such Person’s behalf.

7. “SAFE Parties” means Blockchain Recovery Investment Consortium, LLC, acting in its capacity as the Complex Asset Recovery Manager and Litigation Administrator for Celsius Holding LLC, James M. Farrar, Adda B. Delgadillo-Farrar, Infinite Mining, LLC, Thomas Lienhart, Pepper Grove Holdings Limited, Private Investor Club Feeder Fund 2021-H LLC, Emil Stefkov, Robert Schoemaker, Russell’s Bromeliads EQRP 401K, Ten R Ten, LLC, Brad Weber,

General Global Capital, JWS QRP Holdings LLC, and Permit Ventures LLC and each of their current or former directors, officers, managers, employees, agents, attorneys, advisors, representatives, predecessors, successors, assigns, parents, affiliates, subsidiaries, partners, investors, equity owners, and any other Person or Entity acting on their behalf

8. “You” and “Your” refer to the SAFE Parties to whom these Requests are directed, such that a Request propounded to “You” or “Your” calls for a separate response by each of the SAFE Parties. “You” and “Your” shall further include any of Your current or former directors, officers, managers, employees, agents, attorneys, advisors, representatives, predecessors, successors, assigns, parents, affiliates, subsidiaries, partners, investors, equity owners, and any other Person or Entity acting on their behalf.

9. Each reference to a corporation, partnership, joint venture, unincorporated association, government agency, or other fictitious person shall be deemed to include each and all of its subsidiaries, affiliates, predecessors and successors, and with respect to each of such entities, its officers, directors, shareholders, employees, partners, limited partners, representatives, agents, accountants, attorneys, and any other person who acted on its behalf.

INSTRUCTIONS FOR REQUESTS FOR PRODUCTION OF DOCUMENTS

1. The words in each Request shall be construed so that each Request shall be construed broadly rather than narrowly and, therefore, the singular includes the plural and vice versa; the words “and” and “or” shall be both conjunctive and disjunctive; the word “all” means “any and all”; the word “any” means “any and all” or “each and every”; and the term “including” shall be construed to mean “without limitation.”

2. All Documents are to be produced as kept in the usual course of business and are to be organized and labeled to specify the Documents from which the answers to these Requests may be derived or ascertained.

3. Each Request seeks production of each Document in its entirety, without abbreviation or redaction, and all drafts and non-identical copies of each Document. Any copy of a Document that varies in any way from the original or from any other copy of the Document, whether by reason of any handwritten (or other) notation or any omission, shall constitute a separate Document that must be produced (regardless of whether the original of such Document is within Your possession, custody, or control).

4. Should You object to, or fail to provide an answer to any Request, in whole or in part, You shall state Your objections and/or reasons for not fully responding. If a Request is only partly objectionable, respond to the remainder of the Request for Production. If any Request, instruction, or definition is considered ambiguous, set forth the matter deemed ambiguous and the construction used in answering.

5. If You are withholding any information or Documents on the basis of any claim of privilege, You are requested to submit, in lieu of any such Document, a written statement (a) identifying the Person(s) who prepared or authored the Document and, if applicable, the Person(s) to whom the Document was sent or shown, (b) specifying the date on which the Document was prepared or transmitted, (c) describing the nature of the Document (e.g., letter, email, etc.), (d) stating briefly why the Document is claimed to be privileged or to constitute work product, and (e) identifying the Request to which the Document relates.

6. If a portion of an otherwise responsive Document contains information subject to a claim of privilege, only that portion of the Document subject to the claim of privilege shall be deleted or redacted from the Document following the instructions in the preceding paragraph and the rest shall be produced.

7. If any Document requested herein was formerly in Your possession, custody, or control and has been lost or destroyed or otherwise disposed of, You are requested to submit, in lieu of any such Document, a written statement (a) describing in detail the nature of the Document and its contents, (b) identifying the Person(s) who prepared or authored the Document, and, if applicable, the Person(s) to whom the Document was sent, (c) specifying the date on which the Document was prepared or transmitted, and (d) specifying the date on which the Document was lost or destroyed and, if destroyed, the conditions of and reasons for such destruction and the Person(s) performing the destruction.

8. Except for electronic documents (such as Excel files) for which production in native format best preserves the document's characteristics, electronic documents, electronically stored information and electronic mail shall be produced as single-page Group IV TIFF images, DAT file compatible with Relativity and image load file compatible with IPRO, with the following metadata fields, to the extent such metadata exists: Custodian, File Path, Email Subject, Conversation Index, From, To, CC, BCC, Date Sent, Time Sent, Date Received, Time Received, Author, Date Created, Date Modified, MD5 Hash, File Size, File Extension, Control Number Begin, Control Number End, Attachment Range, Attachment Begin, and Attachment End (or the equivalent thereof).

9. The Requests shall be deemed continuing so as to require prompt supplemental responses if You obtain or discover additional information between the time of the initial response and the time of trial.

10. You should consult the Federal Rules of Bankruptcy Procedures and the Federal Rules of Civil Procedure for additional instructions and duties that you might have concerning Your answers to these Requests, which rules are incorporated herein by reference.

REQUEST

1. All Communications between You and any Person Concerning the above-captioned bankruptcy cases or the Debtors.