

**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)
	§	

**STRIS & MAHER LLP’S NINTH MONTHLY FEE STATEMENT
FOR THE PERIOD MAY 1, 2025, THROUGH MAY 31, 2025**

Stris & Maher LLP (“Stris & Maher”) submits, pursuant to the Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the “Interim Compensation Order”) (ECF No. 264) entered on October 14, 2024, this monthly fee statement for the payment of interim compensation rendered and reimbursement of expenses incurred during the period May 1, 2025, through May 31, 2025 (the “Monthly Fee Statement”).

Stris & Maher seeks payment of interim compensation in the total amount of \$143,678.00 (80% of the services rendered), plus \$7,394.36 (100% of the interim expenses incurred). *See* Interim Compensation Order at ¶ 1(a). Summaries of the fees and expenses are attached as Exhibits 1, 2, and 3. Invoices reflecting detailed time entries are attached hereto as Exhibit 4.

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), 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.



Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall serve within 14 days after delivery of the Monthly Fee Statement a written notice, via email, upon Stris & Maher and each of the other Fee Notice Parties (as listed below) (the “Written Notice”). The Written Notice shall set forth with reasonable detail the nature of the objection and the amount at issue. If the parties are unable to reach a resolution of the objection within 14 calendar days, the objecting party shall file its objection (the “Objection”) with this Court within 3 business days and serve such Objection on Stris & Maher and each of the other Fee Notice Parties. See Interim Compensation Order ¶ 1(c).

The Fee Notice Parties as defined in the Interim Compensation Order are:

- a. Rhodium Enterprises, Inc., Attn: Charles Topping (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 2617 Bissonnet Street, Suite 234, Houston, Texas 77005;
- b. Debtors’ Bankruptcy Counsel, c/o Quinn Emanuel Urquhart & Sullivan, LLP, Attn: Patricia B. Tomasco (pattytomasco@quinnemanuel.com); Razmig Izakelian (razmigizakelian@quinnemanuel.com), Alain Jaquet (alainjaquet@quinnemanuel.com), and Joanna D. Caytas (joannacaytas@quinnemanuel.com), 700 Louisiana, Suite 3900, Houston, Texas 77002;
- c. Debtors’ Financial Advisor, c/o Province, Attn: Mark Robinson (mrobinson@provincefirm.com); David Dunn (ddunn@provincefirm.com); Kirsten Lee (klee@province.com); and Andrew Popescu (apopescu@provincefirm.com), 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074;
- d. Galaxy Digital, LLC, in its capacity as DIP Agent, c/o Orrick, Herrington & Sutcliffe LLP, Ryan C. Wooten (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 51 West 52nd Street, New York, New York 10019;
- e. Counsel or proposed counsel to any statutory committee appointed in these Chapter 11 Cases; and
- f. United States Trustee, Ha Minh Nguyen (ha.nguyen@usdoj.gov), 515 Rusk, Suite 3516, Houston, Texas 77002.

If no objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Stris & Maher an amount equal to 80% of the fees and 100% of the expenses listed herein, or if an objection is timely served, such percentage of fees and expenses that are not subject to an objection, as stated in the Interim Compensation Order.

Respectfully submitted this 13th day of June, 2025.

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

/s/ Patricia B. Tomasco

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-and-

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Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on June 13, 2025, a true and correct copy of the foregoing Monthly Fee Statement was served through the Court's Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco

Patricia B. Tomasco

EXHIBIT 1**Summary of Legal Fees for the Fee Period**

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	6.20	\$6,170.00	\$4,936.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	169.00	\$159,317.50	\$127,454.00
007	Retention and Fee Applications	13.10	\$14,110.00	\$11,288.00
Total		188.3	\$179,597.50	\$143,678.00

EXHIBIT 2**Summaries of Hours Billed by Stris & Maher Attorneys and Paraprofessionals****Midas Green Patent Litigation**

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	3.90	\$4,875.00
Bridget Asay	Partner	1997	1,200.00	.40	\$480.00
Colleen Smith	Partner	2015	850.00	.30	\$255.00
Andrew Atsalis	Litigation Fellow	N/A	350.00	.20	\$70.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	1.40	\$490.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	53.00	\$66,250.00
Bridget Asay	Partner	1997	1,200.00	32.00	\$38,400.00
Victor O'Connell	Partner	2012	1,025.00	.50	\$512.50
John Stokes	Partner	2016	1,025.00	33.60	\$34,440.00
Colleen Smith	Associate	2015	850.00	2.30	\$1,955.00
Peter Brody	Associate	2016	850.00	.40	\$340.00
Monica Viramontes	Senior Paralegal	N/A	425.00	12.00	\$5,100.00
Quoc Hoang	Legal Tech Specialist	N/A	350.00	.50	\$175.00
Andrew Atsalis	Litigation Fellow	N/A	350.00	3.50	\$1,225.00
Cynthia Huang	Litigation Fellow	N/A	350.00	.70	\$245.00
Sebastian Delgado	Litigation Fellow	N/A	350.00	14.50	\$5,075.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	.60	\$210.00
Jaida Hodge-Adams	Litigation Fellow	N/A	350.00	15.40	\$5,390.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	2.40	\$3,000.00
Bridget Asay	Partner	1997	1,200.00	4.20	\$5,040.00
Victor O'Connell	Partner	2012	1,025.00	.90	\$922.50
John Stokes	Partner	2016	1,025.00	4.50	\$4,612.50
Colleen Smith	Partner	2015	850.00	.30	\$255.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	.70	\$280.00

EXHIBIT 3**Summaries of Expenses for the Fee Period****Midas Green Patent Litigation**

Expense	Amount
E-discovery platform fees	\$3,765.00
Total	\$3,765.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
E-discovery platform fees	\$2,646.00
E-discovery related costs	\$983.36
Total	\$3,629.36

EXHIBIT 4



June 10, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14587
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through May 31, 2025

RE: Midas Green Litigation

Total Professional Services	\$ 6,170.00
Total Expenses Advanced	<u>\$ 3,765.00</u>
TOTAL THIS INVOICE	\$ 9,935.00
Previous Balance	<u>\$ 13,906.50</u>
TOTAL BALANCE DUE	<u>\$ 23,841.50</u>

Stris & Maher LLP

Invoice # 14587

June 10, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
5/08/25	EB	Review and respond to P. Tomasco regarding notice of filing of Midas reply (0.1); review same (0.1).	.20	1250.00	250.00
5/09/25	EB	Correspond with BA and JS regarding status and high priority action items (0.2); attend teleconference with BA and JS regarding GMO request for declaration (0.2); correspond with [REDACTED] regarding protective order compliance and related vendor and document issues (0.2).	.40	1250.00	500.00
5/09/25	NC	Prepare notice of filing for EB (0.8); prepare exhibits for same for EB (0.6).	1.40	350.00	490.00
5/09/25	ASA	Assist NC with preparation of notice of order.	.20	350.00	70.00
5/20/25	EB	Communicate with P. Tomasco regarding and begin preparing for hearing on Midas claim.	.50	1250.00	625.00
5/21/25	EB	Correspond with R. Harrington regarding hearing on objection to Midas proof of claim.	.10	1250.00	125.00
5/27/25	EB	Begin preparing for hearing and [REDACTED] on Midas proof of claim in consultation with BA, JS, and R. Harrington.	.50	1250.00	625.00
5/27/25	BA	Confer with EB regarding [REDACTED] to Midas claim and correspond with EB and Quinn team regarding same.	.20	1200.00	240.00
5/28/25	EB	Prepare and coordinate contact with clerk and opposing counsel regarding hearing request (0.2); update client regarding status and next steps (0.1); coordinate filing of notice of hearing with CS (0.2); assess potential further briefing in advance of hearing and correspond with co-counsel regarding same (1.0).	1.50	1250.00	1,875.00
5/28/25	BA	Correspond with EB and team regarding outreach to court on Midas Green hearing.	.20	1200.00	240.00
5/28/25	CS	Review, finalize and file notice of hearing.	.30	850.00	255.00
5/29/25	EB	Correspond with R. Harrington regarding next steps to prepare for upcoming hearing.	.10	1250.00	125.00

Stris & Maher LLP

Invoice # 14587

June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/30/25	EB	Continue working on next steps in support of opposition to Midas Green claim in consultation with co-counsel (0.5); update BA and JS regarding same (0.1).	.60	1250.00	750.00

TOTAL PROFESSIONAL SERVICES**\$ 6,170.00****SUMMARY OF PROFESSIONAL SERVICES**

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	3.90	1,250.00	4,875.00
Bridget Asay	BA	Partner	.40	1,200.00	480.00
Colleen Smith	CS	Associate	.30	850.00	255.00
Andrew Atsalis	ASA	Fellow	.20	350.00	70.00
Nicholas Capalbo	NC	Fellow	1.40	350.00	490.00
Total			6.20		\$ 6,170.00

EXPENSES ADVANCED

Date	Task	Description	Amount
5/16/25		JND Discovery Invoice for April 2025.	3,765.00

TOTAL EXPENSES ADVANCED**\$ 3,765.00****TOTAL THIS INVOICE****\$ 9,935.00**

Stris & Maher LLP

Invoice # 14587

June 10, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14530	4/23/25	28,410.00	25,071.00	3,339.00
14560	5/14/25	10,567.50	.00	10,567.50
Previous Balance				\$ 13,906.50
Balance Due This Invoice				<u>\$ 9,935.00</u>
TOTAL BALANCE DUE				<u><u>\$ 23,841.50</u></u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$ 10,567.50	\$ 3,339.00	\$.00	\$.00	\$.00	\$ 13,906.50



June 10, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14575
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through May 31, 2025

RE: Whinstone Litigation

Total Professional Services	\$ 159,317.50
Total Expenses Advanced	<u>\$ 3,629.36</u>
TOTAL THIS INVOICE	\$ 162,946.86
Previous Balance	<u>\$ 154,360.50</u>
TOTAL BALANCE DUE	<u>\$ 317,307.36</u>

Trust Funds Remaining on Account \$ 115,369.59

Stris & Maher LLP

Invoice # 14575

June 10, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
5/01/25	EB	Attention to high priority action items including protective order compliance.	.50	1250.00	625.00
5/01/25	MV	Discuss Logikcull download data options with chief technology officer, correspondence regarding the same (0.2); review protective order regarding destruction of documents after dismissal, correspondence regarding next steps for data destruction and download of client data (0.5).	.70	425.00	297.50
5/02/25	EB	Review draft and correspond with BA and JS regarding [REDACTED] declaration (0.2); further revise same (0.3); prepare for (0.2) and attend (0.7) teleconference with BA and [REDACTED] regarding declaration and protective order compliance; correspond with MV regarding next steps in support of protective order compliance (0.1).	1.50	1250.00	1,875.00
5/02/25	BA	Confer with EB and [REDACTED] to discuss and revise declaration (0.7); review revised declaration and correspond with EB and JS regarding same (0.1).	.80	1200.00	960.00
5/02/25	JS	Work on declaration of [REDACTED] in connection with LKC revised retention application.	.40	1025.00	410.00
5/05/25	EB	Correspond with BA, JS, co-counsel and clients regarding status and action items including additional dismissal papers and compliance with settlement agreement provisions (0.4); evaluate further potential revisions to [REDACTED] declaration (0.2).	.60	1250.00	750.00
5/05/25	BA	Review comments from [REDACTED] regarding declaration, correspond with EB and JS regarding same, and review settlement agreements as requested by [REDACTED] in connection with declaration (0.4); correspond with EB and JS regarding arbitration dismissal and review docket for arbitration (0.2).	.60	1200.00	720.00
5/05/25	JHA	Prepare memorandum with links to important documents for attorney use.	2.00	350.00	700.00

Stris & Maher LLP

Invoice # 14575

June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/06/25	EB	Review related correspondence, revise [REDACTED] declaration, and correspond with BA, JS, and [REDACTED] regarding next steps in support of same (0.4); correspond with BA, JS, ASA, and co-counsel regarding updates and action items including filing of arbitration dismissal request and client updates (0.2); correspond with BA, KH, VO, ASA, client, and counsel for [REDACTED] regarding response to transcript request (0.3).	.90	1250.00	1,125.00
5/06/25	BA	Correspond with AA, EB and team regarding AAA docket and efile, review final stipulation of dismissal and efile same (0.3); correspond JS, and with EB and JS regarding LKC fee dispute (0.2); confer with EB and correspond with EB and team regarding request from [REDACTED] for deposition transcript, and research same (0.3).	.80	1200.00	960.00
5/06/25	JHA	Prepare memorandum with links to important documents for attorney use.	3.00	350.00	1,050.00
5/06/25	ASA	Correspond with EB, BA, and A. Swartz (Lehotsky Keller Cohn) regarding filing of joint motion to dismiss arbitration (0.3); file and organize closing American Arbitration Association documentation at request of BA (0.5).	.80	350.00	280.00
5/07/25	EB	Review correspondence regarding final revisions to [REDACTED] declaration (0.1); work on protective order compliance requirements and related vendor and document issues (0.2).	.30	1250.00	375.00
5/07/25	JS	Work on finalization of [REDACTED] declaration in support of LKC amended retention application (0.8); evaluate Debtor arguments in support of LKC amended retention application (0.5).	1.30	1025.00	1,332.50
5/07/25	JHA	Detailed tracking of docket updates for bankruptcy proceeding.	.60	350.00	210.00

Stris & Maher LLP

Invoice # 14575

June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/08/25	EB	Continue assessing requirements and working on protective order compliance (1.1); correspond with PB and MV regarding same (0.1); review and respond to correspondence with BA and JS regarding high priority action items including client update regarding SAFE objections (0.1).	1.30	1250.00	1,625.00
5/08/25	BA	Confer with JS regarding reply in support of application to amend LKC retention (0.3); begin researching and drafting reply memorandum in support of Debtors' application to amend LKC retention and correspond with JS regarding strategy for same (2.1); correspond with EB, JS, PB and ██████████ regarding status and high priority action items (0.5).	2.90	1200.00	3,480.00
5/08/25	JHA	Continue preparing memorandum with links to important documents for attorney use.	.50	350.00	175.00
5/08/25	SD	Research docket and pull documents related to Lehotsky Keller Cohen's retention dispute (1.6); begin preparing Rhodium's response to SAFE's objection to the Lehotsky Keller Cohen retention for BA (0.9).	2.50	350.00	875.00
5/09/25	EB	Attend teleconference with BA and JS regarding GMO request for declaration (0.2); attend to and correspond with ██████████ regarding protective order compliance and related vendor and document issues (0.4).	.60	1250.00	750.00
5/09/25	BA	Correspond with EB regarding status and high priority action items including recent filings (0.2); confer with EB and JS regarding high priority action items including GMO request for business records (0.2).	.40	1200.00	480.00
5/09/25	JS	Confer with EB and BA regarding GMO subpoena (0.2).	.20	1025.00	205.00
5/09/25	JHA	Continue preparing memorandum with links to important documents for attorney use.	2.00	350.00	700.00
5/09/25	SD	Work on debtors' reply to objection of the ad hoc group of SAFE parties for BA.	1.60	350.00	560.00
5/10/25	EB	Review and respond to correspondence from BA and JS regarding client teleconference.	.10	1250.00	125.00
5/10/25	BA	Continue researching and drafting reply in support of Debtors' application to amend LKC retention (3.3).	3.30	1200.00	3,960.00

Stris & Maher LLP

Invoice # 14575

June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/11/25	BA	Continue researching and drafting reply in support of Debtors' application to amend LKC retention and correspond with JS regarding same.	1.00	1200.00	1,200.00
5/12/25	EB	Attend portion of teleconference with BA, [REDACTED] and [REDACTED] regarding action items including protective order compliance and related document issues (0.6); correspond with MV regarding database backup process and client request (0.2); correspond with P. Tomasco, R. Izakelian, clients, and Stris team regarding same (0.1).	.90	1250.00	1,125.00
5/12/25	BA	Confer with [REDACTED] and E. Brannen regarding matters related to protective order and data preservation needs (0.5); confer with [REDACTED] regarding issues related to LKC retention dispute (0.1); confer with [REDACTED] and P. Tomasco regarding protective order/data preservation and Stris retention matter (0.3); (0.8); correspond with SD regarding review of transcript of prior status conference regarding LKC retention (0.2); correspond with W. Thompson regarding deadline for filings related to LKC retention dispute (0.1); correspond and confer with JS regarding LKC retention dispute and briefing on same (0.1); continue researching and drafting reply in support of updated LKC retention (1.7).	3.00	1200.00	3,600.00
5/12/25	JS	Review BA draft of reply regarding LKC retention application.	.50	1025.00	512.50
5/12/25	JHA	Continue preparing memorandum with links to important documents for attorney use.	2.20	350.00	770.00
5/12/25	SD	Evaluate transcripts and transcribed audio recordings to confirm information for BA regarding LCK retention.	1.40	350.00	490.00
5/12/25	MV	Review correspondence regarding transfer of client data (0.1); evaluate steps for transfer of data and correspond with vendor regarding same (0.2).	.30	425.00	127.50
5/13/25	EB	Review and correspond with BA and JS regarding action items including further revisions to Debtors' draft reply submission in support of LKC amended fee application (0.4); correspond with R. Izakelian regarding protective order compliance and related document issues and procedures (0.1).	.50	1250.00	625.00

Stris & Maher LLP

Invoice # 14575

June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/13/25	BA	Review and revise draft reply in support of LKC retention and convey same to [REDACTED] for review, and review comments and suggestions from [REDACTED] on same (0.6); review question from LKC's counsel regarding [REDACTED] issues and correspond with JS regarding same (0.2) and confer with JS regarding same (0.2).	1.00	1200.00	1,200.00
5/13/25	JS	Attend teleconference with BA regarding LKC retention application (0.2).	.20	1025.00	205.00
5/13/25	CHH	Assist MV with pull of Logikcull data for clients.	.10	350.00	35.00
5/13/25	PB	Correspond with EB and MV to provide information in support of client data request.	.40	850.00	340.00
5/13/25	MV	Work on exporting of client data from Logikcull including corresponding with vendor and creating searches and initial download of files (4.7); update EB regarding estimate of project scope (0.3).	5.00	425.00	2,125.00
5/14/25	EB	Correspond with Stris team regarding status and high priority action items (0.5); advise MV regarding information in support of file backup request from client and co-counsel (0.1).	.60	1250.00	750.00
5/14/25	BA	Research [REDACTED] issues as relevant to LKC retention, correspond with JS and EB regarding same, and confer with JS regarding same.	.30	1200.00	360.00
5/14/25	JS	Evaluate [REDACTED] issues and confer with BA regarding same (0.4) and prepare [REDACTED] declaration (1.5).	1.90	1025.00	1,947.50
5/14/25	CHH	Review and respond to attorney correspondence.	.10	350.00	35.00
5/14/25	MV	Continue working on exporting of client data including correspondence with vendor regarding redacted and native unredacted files, running test export, and discussing same with QH.	1.50	425.00	637.50
5/15/25	EB	Assess and review and respond to correspondence with BA, JS, co-counsel and client regarding response to inquiry concerning [REDACTED].	.50	1250.00	625.00

Stris & Maher LLP

Invoice # 14575

June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/15/25	BA	Review client request regarding [REDACTED] and correspond with EB regarding same (0.1); continue drafting reply in support of LKC retention, correspond with JS and EB regarding same, and revise draft to incorporate client comments and convey revisions to JS and EB (1.2).	1.30	1200.00	1,560.00
5/15/25	JS	Work on Debtors' reply in support of LKC updated retention.	2.50	1025.00	2,562.50
5/15/25	SD	Cite check and assist BA with finalization of Debtors' reply to SAFE Group's objection to Lehotsky Keller Cohen amended retention agreement.	3.50	350.00	1,225.00
5/16/25	EB	Communicate with J. Cohn regarding status and action items in advance of hearing on LKC updated fee application (0.1); review, revise, and correspond with BA, JS, and CS regarding revisions to draft reply in support of same and [REDACTED] declaration (1.7); review and correspond with BA, JS, P. Tomasco, and R. Izakelian regarding action items including opposition to SAFE motion to compel and motion for protective order (0.7); review related correspondence and confer with BA and JS regarding deposition request (0.2).	2.70	1250.00	3,375.00
5/16/25	BA	Convey new discovery subpoenas from SAFE AHG to P. Tomasco and [REDACTED] (0.1); review draft motion for a protective order prepared by Quinn and convey comments on same (0.3); review final draft of reply memorandum in support of LKC retention and correspond with SD and CS as needed to assist in finalizing same and confirm filing of same, and correspond with [REDACTED] regarding same (0.8); review correspondence from AHG regarding request for deposition and confer with JS and EB regarding same (0.2); confer with SD regarding preparation of exhibit and witness list, correspond with JS regarding potential witness, and convey initial draft of same to JS (0.4).	1.80	1200.00	2,160.00
5/16/25	CHH	Precisely track and organize documents and deadlines for attorney use.	.20	350.00	70.00
5/16/25	SD	Continue assisting BA with revisions to Debtors' reply regarding Lehotsky Keller Cohn retention (1.4); research regarding witness and exhibit lists and begin drafting Debtors' witness and exhibit list for Lehotsky Keller Cohn retention hearing (1.6).	3.00	350.00	1,050.00

Stris & Maher LLP

Invoice # 14575

June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/16/25	MV	Correspond with CHH regarding action items in support of client data export including additional production in separate workspace.	.20	425.00	85.00
5/17/25	EB	Review correspondence from counsel for SAFE AHG (0.1); correspond with BA and JS regarding revisions to response to same (0.2).	.30	1250.00	375.00
5/17/25	BA	Correspond with JS and EB regarding responses to SAFE AHG.	.20	1200.00	240.00
5/17/25	JS	Review and evaluate next steps in light of SAFE AHG notice of deposition of C. Topping and correspond with SAFE AHG regarding same.	3.10	1025.00	3,177.50
5/18/25	EB	Correspond with BA and JS regarding revisions to further correspondence with counsel for SAFE AHG regarding upcoming hearing and strategy for same.	.70	1250.00	875.00
5/18/25	BA	Review ongoing correspondence with SAFE AHG's regarding upcoming hearing and correspond with JS and EB regarding [REDACTED] and for hearing (0.5); draft exhibit and witness list and convey same to JS and EB for review, and correspond with CS regarding upcoming filing (0.6).	1.10	1200.00	1,320.00
5/18/25	JS	Further review and evaluate next steps in light of SAFE AHG notice of deposition of C. Topping and correspond with SAFE AHG regarding same.	4.00	1025.00	4,100.00
5/19/25	EB	Attend teleconference with BA, JS, and counsel for LKC regarding discussions with counsel for SAFE AHG regarding challenge to C. Topping declaration (0.5); attention to negotiations and communications addressing same (1.3); review and correspond with BA regarding revisions to exhibit and witness lists (0.2); correspond with BA and JS regarding protective order compliance and [REDACTED] (0.1); begin preparing for C. Topping deposition preparation (1.0).	3.10	1250.00	3,875.00

Stris & Maher LLP

Invoice # 14575

June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/19/25	BA	Participate in teleconference with JS, EB, and LKC's counsel to discuss potential continuance of hearing, prep for same, and planned conferral with SAFE AHG (.5); correspond with JS, EB, SD, and CS as needed for final revisions to and finalization of exhibit and witness list, and review and approve same for filing (0.5); draft motion for continuance and/or acceptance of Topping declaration and correspond with SD and JH as needed for assistance with formatting and revisions to same (1.2); review correspondence with SAFE AHG in attempt to negotiate continuance and correspond and confer with JS regarding strategy for and responses to same (0.6); correspond with EB regarding [REDACTED] issues (0.1); correspond with CS and JS regarding joint motion for continuance, and with Quinn team regarding procedure for same (0.1).	3.00	1200.00	3,600.00
5/19/25	JS	Work on SAFE AHG challenge to C. Topping declaration, including correspondence and calls with opposing counsel, client coordination regarding continuance, and preparation of motion for continuance in light of AHG's unreasonable positions.	7.70	1025.00	7,892.50
5/19/25	CS	Draft stipulation to continue hearing on updated application to employ LKC; draft updated notice of hearing; review docket entries and email communications in preparation for drafting the same; review, finalize and file witness and exhibit list.	1.80	850.00	1,530.00
5/19/25	JHA	Collect materials including emergency motions at BA request (1.0); assist with preparing draft emergency motion (0.5); provide requested additional information to BA including regarding Texas Southern District [REDACTED] and procedures (0.6).	2.10	350.00	735.00
5/19/25	SD	Continue preparing exhibits to accompany Debtors' witness list (1.3); assist BA and JS with potential motion seeking continuance (1.2).	2.50	350.00	875.00
5/20/25	VO	Confer with BA, EB, and JS regarding strategy for upcoming hearing on AHG discovery disputes and strategy for upcoming deposition and hearing related to LKC retention dispute.	.50	1025.00	512.50

Stris & Maher LLP

Invoice # 14575

June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/20/25	EB	Advise NC regarding revisions to notice of rescheduled hearing and correspond with BA, JS, CS, NC, co-counsel and opposing parties regarding same (0.2); correspond with counsel for Whinstone regarding document issues (0.1); review and analyze SAFE AHG correspondence and reply briefing on motion to compel Imperium and Debtors and communicate with BA and JS regarding same (0.4); continue preparing for C. Topping deposition preparation (1.5); confer with BA, VO (portion), and JS regarding ██████ for same and upcoming hearing on AHG discovery disputes and hearing related to LKC retention dispute (0.8).	3.00	1250.00	3,750.00
5/20/25	BA	Confer with JS, EB, and VO (portion) regarding ██████ for upcoming hearing on AHG discovery disputes and ██████ for upcoming deposition and hearing related to LKC retention dispute (0.8); review filings related to AHG discovery disputes and objection to AHG claim (0.3); correspond with EB and JS regarding outreach from M. Fox regarding LKC dispute (0.1); correspond with JS and JH action items in support of upcoming hearing and ensuring ██████ properly requested (0.1); review draft joint request for continuance, review court order granting continuance, review draft notice of hearing, correspond with Quinn team to review same, and assist EB and team with finalizing same (0.2).	1.50	1200.00	1,800.00
5/20/25	CS	Review, finalize and file updated notice of hearing on updated application to employ LKC; email communications regarding the same.	.50	850.00	425.00
5/20/25	CHH	Precisely track and organize documents for attorney use (0.2); precisely track and calendar deadlines for attorney use (0.1).	.30	350.00	105.00
5/20/25	NC	Revise notice of rescheduling of hearing on LKC fee application	.60	350.00	210.00
5/20/25	JHA	Assist BA and JS with preparation for motion to compel hearing and filing privileges.	1.00	350.00	350.00
5/20/25	MV	Continue working on export of unredacted client documents.	.10	425.00	42.50
5/21/25	EB	Continue preparing for deposition preparation of C. Topping pertaining to LKC application for updated fee motion (4.9); analyze interim implications for same from hearing on SAFE and Rhodium discovery motions in consultation with JS (0.2).	5.10	1250.00	6,375.00

Stris & Maher LLP

Invoice # 14575

June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/21/25	BA	Attend motion hearing to monitor with respect to matters relating to Stris, to LKC retention, and to documents produced related to Whinstone litigation, and confer with JS regarding same.	2.00	1200.00	2,400.00
5/21/25	JS	Prepare for and attend hearing on motion to compel filed by SAFE AHG in light of potential connection to LKC retention application (1.8); evaluate next steps in connection with deposition of C. Topping and hearing on LKC retention application in light of same (1.0).	2.80	1025.00	2,870.00
5/21/25	JHA	Attention to attorney requests regarding documents and updates to filing status (0.8); correspond with Houston bankruptcy court regarding filing status for JS (0.2).	1.00	350.00	350.00
5/22/25	EB	Continue preparing for C. Topping deposition (3.5); review portions of rough transcript of ██████████ in support of same (1.2).	4.70	1250.00	5,875.00
5/22/25	BA	Provide research and analysis to EB in preparation for deposition preparation of C. Topping.	.40	1200.00	480.00
5/22/25	JS	Work on preparation for deposition of C. Topping.	.80	1025.00	820.00
5/22/25	QH	Assist with export and download of multiple-part zipped files for requested ██████████.	.50	350.00	175.00
5/22/25	MV	Continue working on export and back up of client documents including correspondence with EB and vendor regarding metadata and potential de-duplication and review of search fields for export.	2.50	425.00	1,062.50
5/23/25	EB	Continue preparing for C. Topping deposition preparation (3.0); attend teleconference with ██████████ regarding same (0.2); correspond with BA, VO, JS, and ASA regarding action items in support of same and resulting from discovery hearing (0.1); begin working on production of certain pre-petition invoices (0.5); correspond with R. Izakelian regarding same (0.1).	3.90	1250.00	4,875.00
5/23/25	BA	Review discovery requests from LKC related to LKC dispute; correspond with EB and review correspondence from AHG regarding Topping deposition parameters.	.20	1200.00	240.00

Stris & Maher LLP

Invoice # 14575

June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/23/25	ASA	Analyze recent filings related to Debtors' application for an updated order authorizing the retention and employment of Lehotsky Keller Cohn LLP at request of EB, review full docket for related filings, and prepare all relevant briefing and supporting material to assist EB with preparation of C. Topping for upcoming deposition.	2.20	350.00	770.00
5/23/25	MV	Review download of zip files containing client data to check file format and functionality of load files.	.20	425.00	85.00
5/24/25	EB	Review and communicate with BA, JS, co-counsel, and [REDACTED] regarding inquiry concerning Whinstone [REDACTED] invoice.	.30	1250.00	375.00
5/24/25	BA	Review Whinstone invoices forwarded by [REDACTED], research same, and correspond with EB and team regarding potential response to same.	.40	1200.00	480.00
5/25/25	EB	Review and respond to correspondence from BA and co-counsel regarding inquiry concerning Whinstone [REDACTED] invoice.	.10	1250.00	125.00
5/25/25	BA	Research background on payment of [REDACTED] charges, draft proposed response to Whinstone objecting to [REDACTED], and convey analysis and proposed draft to client, litigation team, and Quinn team for review.	.60	1200.00	720.00
5/26/25	BA	Correspond with client, EB, and P. Tomasco regarding mistaken Whinstone invoice for [REDACTED].	.10	1200.00	120.00
5/27/25	EB	Continue preparing for and assisting C. Topping with preparation for deposition (4.8); confer with BA regarding issues and analysis in support of same (0.4); communicate with BA, JS, and [REDACTED] regarding hearing scheduled for June 4 (0.1); continue attending to invoices for production in consultation with R. Izakelian, BA, and JS (0.7); confer with BA and JS regarding potential [REDACTED], hearing, and deposition preparation (0.5).	6.50	1250.00	8,125.00

Stris & Maher LLP

Invoice # 14575

June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/27/25	BA	Monitor court hearing as potentially relevant to LKC dispute and update EB and JS regarding same (0.2); analyze issues and confer with EB to assist with deposition preparation for C. Topping (0.4); correspond with EB and JS regarding potential [REDACTED] for LKC dispute and confer with JS and EB regarding issues related to same (0.5); correspond with EB and JS regarding redaction of LKC and Stris invoices for production (0.1); confer with EB and JS regarding potential [REDACTED], hearing, and deposition preparation (0.5).	1.70	1200.00	2,040.00
5/27/25	JS	Prepare for and attend portion of deposition preparation session with C. Topping and EB (1.4); prepare for hearing on LKC retention application (1.5).	3.90	1025.00	3,997.50
5/28/25	EB	Continue preparing for C. Topping deposition (4.0); communicate with [REDACTED], BA, and JS regarding preparation for same and related hearing (0.2).	4.20	1250.00	5,250.00
5/28/25	BA	Assist with matters for preparation for C. Topping deposition, including corresponding with EB and JS regarding issues for same, and regarding invoice production.	.60	1200.00	720.00
5/28/25	JHA	Detailed tracking of docket updates for bankruptcy proceeding.	1.00	350.00	350.00
5/28/25	MV	Continue working on export of client data including creation of additional downloads containing unredacted and redacted data.	1.50	425.00	637.50
5/29/25	EB	Continue preparing for C. Topping deposition.	5.90	1250.00	7,375.00
5/29/25	BA	Confer with EB to assist in preparing for deposition of C. Topping and meet with EB and [REDACTED] regarding same.	3.00	1200.00	3,600.00
5/29/25	JS	Prepare for hearing on LKC retention application.	2.00	1025.00	2,050.00
5/29/25	ASA	Conduct research at request of EB in preparation for upcoming deposition of C. Topping on June 3, 2025.	.50	350.00	175.00
5/30/25	EB	Continue preparing for deposition of C. Topping (4.0); communicate with T. Schmeltz and P. Lohse regarding same (0.2).	4.20	1250.00	5,250.00
5/30/25	JS	Attend portion of deposition preparation session with [REDACTED] and EB (1.5); prepare for hearing on LKC retention application (0.8).	2.30	1025.00	2,357.50

Stris & Maher LLP

Invoice # 14575

June 10, 2025

TOTAL PROFESSIONAL SERVICES**\$ 159,317.50****SUMMARY OF PROFESSIONAL SERVICES**

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	53.00	1,250.00	66,250.00
Bridget Asay	BA	Partner	32.00	1,200.00	38,400.00
Victor O'Connell	VO	Partner	.50	1,025.00	512.50
John Stokes	JS	Partner	33.60	1,025.00	34,440.00
Colleen Smith	CS	Associate	2.30	850.00	1,955.00
Peter Brody	PB	Associate	.40	850.00	340.00
Monica Viramontes	MV	Sr Paralegal	12.00	425.00	5,100.00
Quoc Hoang	QH	Legal Technology Spe	.50	350.00	175.00
Andrew Atsalis	ASA	Fellow	3.50	350.00	1,225.00
Cynthia Huang	CHH	Fellow	.70	350.00	245.00
Sebastian Delgado	SD	Fellow	14.50	350.00	5,075.00
Nicholas Capalbo	NC	Fellow	.60	350.00	210.00
Jaida Hodge-Adams	JHA	Fellow	15.40	350.00	5,390.00
Total			169.00		\$ 159,317.50

EXPENSES ADVANCED

Date	Task	Description	Amount
5/01/25		Logikcull Discovery Solutions (May 2025).	2,646.00
5/22/25		Purchase of (4) hard drives for data backup.	983.36

TOTAL EXPENSES ADVANCED**\$ 3,629.36****TOTAL THIS INVOICE****\$ 162,946.86**

Stris & Maher LLP

Invoice # 14575

June 10, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14517	4/23/25	503,457.91	404,817.41	98,640.50
14547	5/14/25	55,720.00	.00	55,720.00
Previous Balance				\$ 154,360.50
Balance Due This Invoice				<u>\$ 162,946.86</u>
TOTAL BALANCE DUE				<u><u>\$ 317,307.36</u></u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$ 55,720.00	\$ 98,640.50	\$.00	\$.00	\$.00	\$ 154,360.50



June 10, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14588
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through May 31, 2025

RE: Retention and Fee Applications

Total Professional Services	\$ 14,110.00
Total Expenses Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 14,110.00
Previous Balance	<u>\$ 22,513.00</u>
TOTAL BALANCE DUE	<u>\$ 36,623.00</u>

Stris & Maher LLP

Invoice # 14588

June 10, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
5/07/25	EB	Advise NC regarding preparation of portions of monthly fee statement.	.20	1250.00	250.00
5/07/25	NC	Assist EB with preparation of fee statements.	.80	350.00	280.00
5/09/25	EB	Review and revise reply in support of updated retention application to address SAFE objection (0.5); correspond with BA and JS regarding same (0.1).	.60	1250.00	750.00
5/09/25	BA	Confer with EB and JS regarding Ad Hoc Group's objection to updated Stris retention (0.3); draft reply in support of updated Stris retention, convey same to JS and EB for review, and review edits from JS to same (1.0).	1.30	1200.00	1,560.00
5/09/25	JS	Work on Stris reply regarding Stris retention application.	1.50	1025.00	1,537.50
5/10/25	BA	Review comments from P. Tomasco and [REDACTED] on draft reply in support of updated Stris retention, research and further revise same, and convey revised draft to JS and EB for review.	1.80	1200.00	2,160.00
5/10/25	JS	Work on Stris reply regarding Stris retention application.	1.50	1025.00	1,537.50
5/12/25	VO	Prepare certificate of no objection and emails with B. Howell regarding same.	.20	1025.00	205.00
5/12/25	EB	Review and correspond with BA and JS regarding action items including revisions to updated draft reply in support of amended engagement order.	.40	1250.00	500.00
5/12/25	BA	Revise reply in support of Stris retention, convey same to JS, P. Tomasco, and [REDACTED] for review, further revise and finalize same and correspond with CS for filing (0.8); correspond with JS, B. Howell, and P. Tomasco regarding status conference on Stris retention and notice of hearing for same, and correspond with JS regarding status conference (0.2).	1.00	1200.00	1,200.00
5/12/25	JS	Work on reply regarding Stris retention application.	1.50	1025.00	1,537.50
5/12/25	CS	File Reply to Ad Hoc Group of Safe Parties Objection to Debtor's Application for an Updated Order Authorizing the Retention and Employment of Stris & Maher LLP as Special Litigation Counsel.	.30	850.00	255.00

Stris & Maher LLP

Invoice # 14588

June 10, 2025

Date	Tkpr	Description	Hours	Rate	Amount
5/13/25	EB	Prepare portions of monthly fee statement.	.70	1250.00	875.00
5/13/25	BA	Attend by teleconference status conference on Stris retention.	.10	1200.00	120.00
5/20/25	EB	Continue working on portions of monthly fee statement.	.50	1250.00	625.00
5/21/25	VO	Prepare April monthly fee application (0.5); emails with B. Howell and client regarding same (0.2).	.70	1025.00	717.50

TOTAL PROFESSIONAL SERVICES**\$ 14,110.00****SUMMARY OF PROFESSIONAL SERVICES**

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	2.40	1,250.00	3,000.00
Bridget Asay	BA	Partner	4.20	1,200.00	5,040.00
Victor O'Connell	VO	Partner	.90	1,025.00	922.50
John Stokes	JS	Partner	4.50	1,025.00	4,612.50
Colleen Smith	CS	Associate	.30	850.00	255.00
Nicholas Capalbo	NC	Fellow	.80	350.00	280.00
Total			13.10		\$ 14,110.00

TOTAL THIS INVOICE**\$ 14,110.00**

Stris & Maher LLP

Invoice # 14588

June 10, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14532	4/23/25	11,102.50	8,882.00	2,220.50
14561	5/14/25	20,292.50	.00	20,292.50
Previous Balance				\$ 22,513.00
Balance Due This Invoice				<u>\$ 14,110.00</u>
TOTAL BALANCE DUE				<u><u>\$ 36,623.00</u></u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$ 20,292.50	\$ 2,220.50	\$.00	\$.00	\$.00	\$ 22,513.00