

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

<b>In re:</b>  <b>RHODIUM ENCORE LLC, <i>et al.</i>,</b>  <b>Debtors.</b>	<b>Chapter 11</b>  <b>Case No. 24-90448 (ARP)</b>  <b>(Jointly Administered)</b> <b>Relates to Docket No. 1126, 1301</b>
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**SAFE CLAIMANTS' JOINDER  
TO SAFE CLAIMANT RESPONSE TO CLAIM OBJECTION**

TO THE HONORABLE ALFREDO R. PEREZ, BANKRUPTCY JUDGE:

Brad Weber (Claim No. 28), Jonathan Spaeth (Claim No. 34), Emil Stefkov (Claim No. 46), Pepper Grove Holdings Limited (Claim No. 51), James Farrar and Adda Delgadillo Farrar (Claim Nos. 83 and 149), Thomas Lienhart (Claim No. 152), Infinite Mining LLC (Claim Nos. 197 and 198), Ten R Ten, LLC (Claim No. 223), and Magic Circle Trust (claimant also known as Russells Bromeliads eqrp 401k, Claim No. 224) (collectively, the “SAFE Claimants” and their claims the “SAFE Claims”) file their *Joinder* (the “Joinder”) to *Safe Claimant Response to Claim Objection* [Docket No. 1301] (the “Response”) to the *Debtors’ Omnibus Objection to Claims Pursuant to Bankruptcy Code Sections 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 Because Safe Holders Do Not Hold Claims* [Docket No. 1126] (the “Objection”).

1. The SAFE Claimants hereby join and incorporate all factual assertions and legal arguments set forth in the Response regarding the Objection as if the Response were fully set forth herein.

2. The SAFE Claimants believe that their SAFE Claims are debt and not equity. Therefore, the SAFE Claimants file this Joinder and reserve all rights with respect to this Joinder,



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including the right to supplement and join in any other filings and present further arguments at any hearing on the Objection, Response, or this Joinder.

3. The SAFE Claimants file their Joinder and request any further relief to which they may be entitled.

**Dated: June 18, 2025**

Graham  PLLC

/s/ Genevieve M. Graham

Genevieve M. Graham  
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***Counsel for SAFE Claimants***

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing *Joinder* was served via CM/ECF on June 18, 2025.

/s/ Genevieve M. Graham

Genevieve M. Graham