

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

In re

RHODIUM ENCORE LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-90448 (ARP)

(Jointly Administered)

**Re: Docket Nos. 1126, 1299**

**JOINDER OF  
PROOF CAPITAL SPECIAL SITUATIONS FUND  
TO CELSIUS HOLDINGS US LLC'S RESPONSE TO THE  
DEBTORS' OMNIBUS OBJECTION TO CLAIMS PURSUANT TO  
BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY RULE 3007, AND  
LOCAL RULE 3007-1 BECAUSE SAFE HOLDERS DO NOT HOLD CLAIMS**

Proof Capital Special Situations Fund ("Proof Situations"), by and through its undersigned counsel, Cole Schotz P.C., respectfully submits this joinder (the "Joinder") to the response (the "Response") filed by Celsius Holdings US LLC [Docket No. 1299] to the *Debtors' Omnibus Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 Because Safe Holders Do Not Hold Claims* [Docket No. 1126] (the "Objection"). Proof Situations joins, adopts and incorporates in full all of the objections and arguments set forth in the Response as if fully set forth herein.

**RESERVATION OF RIGHTS**

Proof Situations reserves all of its rights, claims, defenses and remedies, including, without limitation, the right to amend, modify or supplement this Joinder, seek discovery, introduce evidence and raise any additional arguments at any hearing to consider the Objection.

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<sup>1</sup> 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), Air HPC LLC (0387), Rhodium Renewables Sub LLC (9511), Rhodium Shared Services LLC (5868), and Rhodium Technologies LLC (3973). The mailing and service address for all of the above cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.



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**CONCLUSION**

WHEREFORE, for the reasons set forth in Response, Proof Situations respectfully requests that the Court deny the Objection.

Dated: June 18, 2025

**COLE SCHOTZ P.C.**

*/s/ Ian Ross Phillips*

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 18, 2025, a true and correct copy of the foregoing Joinder was filed with the Court and served via the Court's CM/ECF notification system upon all parties registered to receive such electronic notices in the above cases.

/s/ Ian Ross Phillips

Ian Ross Phillips