

**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)
	§	

CERTIFICATE OF NO OBJECTION
(Relates to ECF No. 1126)

Pursuant to the Procedures for Complex Cases in the Southern District of Texas, the undersigned counsel for the Rhodium Encore LLC and its debtor-affiliates, as debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), certifies as follows:

1. On May 19, 2025, the Debtors, through its counsel, filed 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 (the “Omnibus Claim Objection”) (ECF No. 1126). The deadline for parties to file responses to the relief requested in the Application was June 18, 2025 (the “Objection Deadline”). The following entities did not file an objection, either formally or informally, by the Objection Deadline: (a) RH Fund III, a Series of Telegraph Treehouse, LP. – Claims 13 and 84 (amended) - \$721,000.00; (b) Christopher McBee – Claim 18 - \$100,000.00; (c) BT Real Estate LLC – Claim 19 - \$50,000.00; (d) Alfred Murray Capital LLC

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.



– Claim 20 - \$50,000.00; (e) Philip M. Fornaro Trust dated January 9, 2017 – Claim 25 - \$50,000.00; (f) Noble Crest Capital LLC – Claim 26 - \$50,000.00; (g) JWS QRP Holdings LLC – Claim 34 - \$75,000.00; (h) AnnMarie Fornaro Trust dated January 9, 2017 – Claim 35 - \$50,000.00; (i) Alexander Matthew Salvadori – Claim 41 - \$25,000.00; (j) Sean Michael Gilbert – Claim 42 - \$25,000.00; and (k) Jeffrey Smith – Claim 231 - \$300,000.00.

2. The undersigned counsel for the Debtors respectfully requests that the Court enter the proposed order attached hereto at its earliest convenience.

Respectfully submitted this 19th 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*

CERTIFICATE OF SERVICE

I, Patricia B. Tomasco, hereby certify that on the 19th day of June, 2025, a copy of the foregoing Certificate of No Objection was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco
Patricia B. Tomasco

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Debtors.	§	(Jointly Administered)
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ORDER DISALLOWING THE PROOFS OF CLAIM

(Relates to ECF No. 1126)

Upon consideration of 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 (the "Objection");² and this Court having jurisdiction to consider the Objection and the relief requested therein pursuant to 28 U.S.C. § 1334; and consideration of the Objection and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Objection having been provided; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and the Court having found and determined that the legal and factual bases set forth in

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

the Objection establish just cause for the relief granted herein; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby

ORDERED, ADJUDGED, AND DECREED that:

1. The Objection is **SUSTAINED** as to specific claims and the following SAFE Holders' Claims are **DISALLOWED**:

- a. RH Fund III, a Series of Telegraph Treehouse, LP – Claims 13 and 84 (amended);
- b. Christopher McBee – Claim 18;
- c. BT Real Estate LLC – Claim 19;
- d. Alfred Murray Capital LLC – Claim 20;
- e. Philip M. Fornaro Trust dated January 9, 2017 – Claim 25;
- f. Noble Crest Capital LLC – Claim 26;
- g. JWS QRP Holdings LLC – Claim 34;
- h. AnnMarie Fornaro Trust dated January 9, 2017 – Claim 35;
- i. Alexander Matthew Salvadori – Claim 41;
- j. Sean Michael Gilbert – Claim 42; and
- k. Jeffrey Smith – Claim 231.

2. The Debtors and the Clerk of the Court are authorized to modify the official Claims Register for these chapter 11 cases in compliance with the terms of this order (the “Order”) and to take all steps necessary or appropriate to carry out the relief granted in this Order.

3. Nothing in the Objection or this Order, nor any actions taken by the Debtors pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable nonbankruptcy law; (b) a waiver of the Debtors’ or any other party in interest’s right to dispute

any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

Dated: _____ 2025

ALFREDO R. PEREZ
UNITED STATES BANKRUPTCY JUDGE