

**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)
	§	

Complex Case Fee Application Coversheet (Hourly)

Name of Applicant:	Stris & Maher LLP	
Applicant's Role in Case:	Special Litigation Counsel	
Docket No. of Employment Order(s):	262	
Interim Application (x) 3rd Final Application ()	Indicate whether this is an interim or final Application. If interim, indicate the number (1 st , 2 nd , 3 rd , etc.)	
	Beginning Date	End Date
Time period covered by this Application for which interim compensation has not previously been awarded:	03/01/25	5/31/25
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? (Y)		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? (Y)		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? (Y)		
Do expense reimbursements represent actual and necessary expenses incurred? (Y)		
Compensation Breakdown for Time Period Covered by this Application		
Total professional fees requested in this Application:	\$728,182.50	

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.



Total professional hours covered by this Application:	728.7
Average hourly rate for professionals:	\$999.29
Total paraprofessional fees requested in this Application:	\$51,465.0
Total paraprofessional hours covered by this Application:	141.6
Average hourly rate for paraprofessionals:	\$363.45
Total fees requested in this Application:	\$779,647.50
Total expense reimbursements requested in this Application:	\$36,894.77
Total fees and expenses requested in this Application:	\$816,542.27
Total fees and expenses awarded in all prior Applications:	\$6,114,879.46
Plan Status: On May 22, 2025, Debtors filed their chapter 11 plan (ECF No. 1174). A day later, they filed their disclosure statement (ECF No. 1179). On June 18, 2025, Debtors filed amended versions of the plan and disclosure statement (ECF Nos. 1297, 1298).	
Primary Benefits: During the Application Period, Stris & Maher LLP represented Debtors in connection ongoing matters relating to the Whinstone Dispute and the Midas Green Matter.	

**IN THE UNITED STATES BANKRUPTCY COURT
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	§	
Debtors.	§	(Jointly Administered)
	§	
	§	

**STRIS & MAHER LLP’S THIRD
APPLICATION FOR PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD
MARCH 1, 2025, THROUGH MAY 31, 2025**

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

Stris & Maher LLP (“Stris & Maher”) files its Third Application for Payment of Compensation and Reimbursement of Expenses for the Period March 1, 2025, through May 31, 2025 (the “Application”), for allowance of compensation for professionals services provided in the amount of \$779,647.50 and reimbursement of actual and necessary expenses in the amount of \$36,894.77 that Stris & Maher incurred from March 1, 2025, through May 31, 2025 (the

² 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.

“Application Period”), as counsel to Rhodium Encore, LLC and its debtor-affiliates (collectively, “Rhodium” or the “Debtors”) in the above-captioned cases and respectfully represents as follows:

JURISDICTION

1. Stris & Maher submits this Application pursuant to §§ 330 and 331 of the Bankruptcy Code, rule 2016 of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”), rule 2016-1 of the Bankruptcy Local Rules (the “Local Rules”), and consistent with the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013 (the “US Trustee Guidelines”).

2. The Court has jurisdiction over these cases pursuant to 28 U.S.C. § 1334. This is a core proceeding under 28 U.S.C. § 157(b). This Court is the proper venue pursuant to 28 U.S.C. §§ 1408 and 1409.

RELIEF REQUESTED

3. Stris & Maher requests that the Court enter an order allowing Stris & Maher’s interim compensation for professional services rendered during the Application Period in the amount of \$779,647.50 and reimbursement of actual and necessary expenses incurred by Stris & Maher in the amount of \$36,894.77.

BACKGROUND

4. On August 24, 2024, Rhodium Encore LLC, Jordan HPC LLC, Rhodium JV LLC, Rhodium 2.0 LLC, Rhodium 10MW LLC, and Rhodium 30MW LLC each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

5. On August 29, 2024, additional affiliates of the Initial Debtors filed, in this Court, voluntary petitions for chapter 11 relief: Rhodium Technologies LLC, Rhodium Enterprises Inc., Rhodium Renewables LLC, Rhodium Ready Ventures LLC, Rhodium Industries LLC, Rhodium

Shared Services LLC, Rhodium Renewables Sub LLC, Rhodium 30MW Sub LLC, Rhodium Encore Sub LLC, Rhodium 10MW Sub LLC, Rhodium 2.0 Sub LLC, Air HPC LLC, and Jordan HPC Sub LLC.

6. The Debtors' cases are jointly administered as *In re Rhodium Encore, LLC, et al.*, Case No. 24-90448 (ARP).

7. On November 22, 2024, the United States Trustee (the "Trustee") filed a Notice of Appointment of Committee of Unsecured Creditors. *See* ECF No. 488. No trustee, examiner, or other official committee has been appointed in these chapter 11 cases (the "Chapter 11 Cases").

8. A detailed description of the facts and circumstances regarding the Debtors' business and capital structure and the circumstances leading to the commencement of these Chapter 11 Cases is set forth in the Declaration of David M. Dunn in Support of Chapter 11 Petitions and First Day Relief (the "First Day Declaration") (ECF No. 35).

9. On September 22, 2024, the Debtors filed the Application of Debtors for Authority to Retain and Employ Stris & Maher LLP as Attorneys Effective as of the Petition Date (the "Retention Application") (ECF No. 170). On October 14, 2024, the Court entered the order granting the Retention Application (the "Retention Order") (ECF No. 262).

10. On September 22, 2024, the Debtors filed the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the "Interim Compensation Motion") (ECF No. 174) and on October 14, 2024, the Court entered the order granting the Interim Compensation Motion (the "Interim Compensation Order") (ECF No. 264).

TERMS AND CONDITIONS OF EMPLOYMENT AND COMPENSATION

11. The terms and conditions of Stris & Maher's employment by the Debtors and compensation to be paid to Stris & Maher are outlined in the Retention Application. *See* ECF No.

170. As set forth in the Retention Application, Stris & Maher's customary fees and expenses incurred in connection with this representation are to be paid by the Debtors' estates.

PROFESSIONAL SERVICES PROVIDED TO THE DEBTORS

12. The following is a summary by task code of the professional services Stris & Maher rendered during the Application Period.

a. Matter No. 001 – Midas Green Patent Litigation: Hours: 24.3; Fees: \$25,902.50. This matter includes resolution of ongoing issues relating to the Midas Green Patent Litigation.

Professional	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	\$1,250.00	15.7	\$19,625.00
Bridget Asay	\$1,200.00	0.9	\$1,080.00
Ken Halpern	\$1,100.00	1.7	\$1,870.00
Victor O'Connell	\$1,025.00	0.3	\$307.50
Colleen Smith	\$850.00	0.3	\$255.00
Helen Marsh	\$700.00	2.5	\$1,750.00
Andrew Atsalis	\$350.00	1.5	\$525.00
Nicholas Capalbo	\$350.00	1.4	\$490.00
Total		24.3	\$25,902.50

b. Matter No. 004 – Whinstone Dispute, Excluding Tarrant County Litigation: Hours: 801.7; Fees: \$708,240.00. This matter includes resolution of ongoing issues relating to the Whinstone Dispute.

Professional	Hourly Rate	Total Hours	Total Compensation
Peter K. Stris	\$1,450.00	23.8	\$34,510.00
Elizabeth Brannen	\$1,250.00	138.5	\$173,125.00
Bridget Asay	\$1,200.00	71.8	\$86,160.00
Tillman Breckenridge	\$1,200.00	47.9	\$57,480.00
Matthew Seligman	\$1,100.00	23.8	\$26,180.00
Victor O'Connell	\$1,025.00	19.4	\$19,885.00
John Stokes	\$1,025.00	115.4	\$118,285.00
Colleen Smith	\$850.00	47.1	\$40,035.00

Professional	Hourly Rate	Total Hours	Total Compensation
Peter Brody	\$850.00	4.4	\$3,740.00
Sarah Rahimi	\$750.00	8.7	\$6,525.00
Helen Marsh	\$700.00	21.9	\$15,330.00
Lisa Sherrod	\$625.00	15.3	\$9,562.50
Tanya Tice	\$525.00	132.7	\$69,667.50
Monica Viramontes	\$425.00	25.4	\$10,795.00
Quoc Hoang	\$350.00	0.5	\$175.00
Andrew Atsalis	\$350.00	30.2	\$10,570.00
Cynthia Huang	\$350.00	8.7	\$3,045.00
Sebastian Delgado	\$350.00	14.9	\$5,215.00
Nicholas Capalbo	\$350.00	9.3	\$3,255.00
Jaida Hodge-Adams	\$350.00	42	\$14,700.00
Total		801.7	\$708,240.00

c. Matter No. 007 – Retention and Fee Application: Hours: 44.3; Fees: \$45,505.00. This matter includes preparing monthly fee statements, preparing the interim fee statements, and redaction of confidential and privileged information.

Professional	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	\$1,250.00	20.5	\$25,625.00
Bridget Asay	\$1,200.00	4.2	\$5,040.00
Victor O’Connell	\$1,025.00	7.1	\$7,277.50
John Stokes	\$1,025.00	4.5	\$4,612.50
Colleen Smith	\$850.00	0.3	\$255.00
Cynthia Huang	\$350.00	4.4	\$1,540.00
Nicholas Capalbo	\$350.00	3.3	\$1,155.00
Total		44.3	\$45,505.00

COMPENSATION REQUESTED

13. In this Application, Stris & Maher seeks approval of \$779,647.50 in fees and \$36,894.77 in expenses incurred from March 1, 2025, through May 31, 2025. Attached as Exhibit A is the Certification of Victor O’Connell in Support of Stris & Maher’s Third Application for Payment of Compensation and Reimbursement of Expenses for the Period March 1, 2025, through May 31, 2025 (the “O’Connell Declaration”). Pursuant to the US Trustee Guidelines, Exhibit B is

a table reflecting customary and comparable compensation disclosures with the Application. Exhibit C is a table summarizing the timekeepers included in this Application. Exhibit D addresses the budget and Exhibit E is a table with a summary of compensation requested by task category. The blended rate for Stris & Maher timekeepers in this Application is \$895.84.

14. During the Application Period, Stris & Maher filed its (a) Seventh Monthly Fee Statement for the Period March 1, 2025, through March 31, 2025 (the “Seventh Monthly Fee Statement”) (ECF No. 1038); (b) Eighth Monthly Fee Statement for the Period April 1, 2025, through April 30, 2025 (the “Eighth Monthly Fee Statement”) (ECF No. 1172); and (c) Ninth Monthly Fee Statement for the Period May 1, 2025 through May 31, 2025 (the “Ninth Monthly Fee Statement”) (ECF No. 1275) (collectively, the “Monthly Fee Statements”).

15. This Application meets the standards of § 331 and applicable case law for compensation for services rendered on behalf of the Debtors’ estates and for the administration of the Chapter 11 Cases. In *Barron & Newburger, P.C. v. Tex. Skyline, Ltd. (In re Woerner)*, 783 F.3d 266 (5th Cir. 2015), the Fifth Circuit reorganized the contours of the requirements for allowance of compensation under § 330. In *Woerner*, the Fifth Circuit held that a court would allow compensation for services rendered by an attorney that are “reasonably likely to benefit” the estate, and that reasonableness should be assessed “at the time at which the service was rendered.” *Id.* at 273–74. The compensation requested in the Application meets the requirements for compensation the Fifth Circuit identified in *Woerner*, and therefor satisfies the requirements for compensation under § 331 and should be approved.

16. Stris & Maher provided necessary and beneficial services to the Debtors in a myriad ways. See the attached Monthly Fee Statements for a detailed description of the services provided

during the Application Period. These efforts were consistent with the *Johnson*³ factors adopted by the Fifth Circuit in *In re First Colonial Corp.*, 544 F.2d 1291, 1299 (5th Cir. 1977), as follows:

a. The Time and Labor Required

17. As further illustrated by the Summary Cover Sheet, the amount of time spent by Stris & Maher professionals and paraprofessionals on this case for the Application Period was 870.3 hours. The amount of time was reasonable and necessary given the complexity and stakes of the Whinstone Litigation.

b. The Novelty and Difficulty of the Questions Presented by the Case

18. This case has presented difficult questions of fact and law relevant to both bankruptcy and applicable nonbankruptcy law.

c. The Skill Requisite to Perform the Legal Services Properly

19. Stris & Maher possesses the skill required to properly perform the legal services involved, including trial expertise and experience with high-stakes commercial litigation.

d. The Preclusion of Other Employment by the Attorneys due to Acceptance of this Case

20. Attorneys at Stris & Maher were precluded from employment on other cases due to the size and exigency of the Whinstone Litigation.

e. The Customary Fee for Similar Work in the Community

21. The fees charged by Stris & Maher are comparable to fees charged by other counsel in similar cases in this jurisdiction. Stris & Maher sets its fees consistent with available market data for situated firms given the years of experience of each attorney. Stris & Maher's blended rates of \$999.29 for professionals and \$363.45 for paraprofessionals compare favorably with hourly rates charged by practitioners in cases of this size, complexity, and significance.

³ See generally *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974).

f. Whether the Fees are Fixed or Contingent

22. Stris & Maher's attorneys in these cases do not charge either fixed or contingent fees.

g. Time Pressure Imposed by the Client or Circumstances

23. The circumstances of the bankruptcy case imposed time pressures due to the expedited discovery and briefing schedule for the court's hearing on Debtors' Motion to Assume Certain Executory Contracts with Whinstone US, Inc. (ECF No. 7).

h. The Amount Involved and Results Obtained as a Result of the Attorney Services

24. As a result of Stris & Maher's services, strategy, and efficiency as special litigation counsel to the Debtors during the Application Period, the Debtors were able to mediate and settle their dispute with Whinstone, in an agreement that recovered \$186 million in cash and stock for Debtors (ECF Nos. 880, 921), negotiate finalizing aspects of that settlement agreement, represent Debtors in the dispute regarding Lehotsky Keller Cohn's amended retention application, and begin addressing issues concerning the claim filed by Midas Green in relation to the Midas Green Litigation Matter.

i. The Experience, Reputation, and Ability of the Attorneys

25. The Stris & Maher attorneys involved in the work on behalf of the debtors have decades of experience in high-stakes litigation and extensive knowledge of Debtors' business, corporate structure, and the legal issues and relevant evidence at issue in this matter.

j. The Undesirability of the Cases

26. Every bankruptcy case carries some risks due to the uncertainty of payment stemming from the relatively unknown value of the debtors' principal assets and the debtors'

ability to pay administrative fees and costs. These cases presented no additional undesirable elements.

k. The Nature and Length of the Professional Relationship with the Client

27. As stated in the Retention Application, Stris & Maher has a longstanding professional relationship with Debtors. In particular, Debtors have employed Stris & Maher to represent them in the Midas Green Patent Litigation since March 31, 2023; the Temple Green Data Matter since April 13, 2023; and the Whinstone Dispute since April 30, 2023.

l. Awards in Similar Cases

28. The fees requested in this Application are in line with fee awards approved in similar cases by counsel with similar sophistication and experience.

CONCLUSION

29. The services provided by Stris & Maher have been necessary to the administration of the Debtors' estates and were beneficial at the time the services were rendered. Further, Stris & Maher performed the services within a reasonable amount of time, commensurate with the complexity, importance, nature of the problems, issues, and tasks addressed on behalf of the Debtors. Finally, the compensation sought is reasonable based on the customary compensation charged by comparably skilled practitioners in cases under title 11 of this district.

30. Stris & Maher requests that the Court determine that the nature, extent, and value of these services were appropriate under the circumstances at the time the services were rendered. Stris & Maher requests that this Court enter an order granting this third interim application for professional services rendered during the Application Period in the amount of \$779,647.50 and reimbursement of actual and necessary expenses incurred by Stris & Maher during the Application Period in the amount of \$36,894.77, authorizing the Debtors to pay the fees and expenses as requested, and grant such other and further relief as is just and proper.

Respectfully submitted this 8th day of July, 2025.

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

/s/ Patricia B. Tomasco

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Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on July 8, 2025, a true and correct copy of the foregoing Interim 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 A
CERTIFICATION OF VICTOR O'CONNELL IN SUPPORT OF STRIS & MAHER
LLP'S THIRD APPLICATION FOR PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
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In re:	§	Chapter 11
	§	
RHODIUM ENCORE LLC, <i>et al.</i> , ¹	§	Case No. 24-90448 (ARP)
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Debtors.	§	(Jointly Administered)
	§	
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**CERTIFICATION OF VICTOR O’CONNELL IN SUPPORT OF
STRIS & MAHER LLP’S THIRD APPLICATION FOR
PAYMENT OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES FOR THE PERIOD
MARCH 1, 2025, THROUGH MAY 31, 2025**

I, Victor O’Connell, hereby certify that:

I am a Partner of the law firm Stris & Maher LLP (“Stris & Maher”).

This certification (the “Certification”) is made in connection with Stris & Maher’s fee application dated July 8, 2025 (the “Application”) for compensation and reimbursement of expenses for the period commencing March 1, 2025, through May 31, 2025 (the “Application Period”). I have reviewed the Application and hereby certify that, to the best of my knowledge, information, and belief, the Application complies with the applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Local Rules, and Fee Guidelines.²

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.

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

Stris & Maher discussed its rates and fees with the Debtors at the outset of these cases and has continued to discuss fees with the Debtors throughout these cases. Attorneys and paraprofessionals assigned to this matter were necessary to assist with the prosecution of the Debtors' chapter 11 cases, preservation of the Debtors' assets and other matters described herein. Neither a budget nor a staffing plan were prepared or discussed with the Debtors in these chapter 11 cases.

In accordance with the Fee Guidelines, I, on behalf of Stris & Maher, respond to the best of my knowledge, information, and belief to the questions identified therein as follows:

Did you agree to any variations from, or alternatives to, your standard or customary billing rates, or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

Response: Stris & Maher agreed to provide a 10% discount on its fees in the Tarrant County Litigation matter. *See* Retention Application, ECF No. 170.

If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher than 10% or more, did you discuss the reasons for the variation with the Client?

Response: A budget was not prepared.

Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?

Response: No.

Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.) If so, please quantify by hours and fees.

Response: No.

Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: Yes; 22.8 hours (total fees of \$25,530).

If the fee application includes any rate increases since retention:

Did your client review and approve those rate increases in advance?

Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modify rates or terms in order to have you continue the representation consistent with ABA Formal Ethics Opinion 11-458?

Response: Yes.

Dated: July 8, 2025

Cerritos, California

/s/ Victor O'Connell
Victor O'Connell

EXHIBIT B
CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES WITH FEE APPLICATIONS

Category of Timekeeper (using categories already maintained by the firm)	Blended Hourly Rate	
	BILLED OR COLLECTED Firm or offices for the preceding year	BILLED In this fee application
Partner	\$839.22	\$1,172.68
Associate	\$640.96	\$630.87
Paraprofessionals	\$288.61	\$363.45
All Timekeepers Aggregate	\$689.80	\$895.84

Case Name: *In re Rhodium Encore LLC, et al.*

Case Number: 24-90448 (ARP)

Applicant's Name: Stris & Maher LLP

Date of Application: July 8, 2025

Interim or Final: Interim

EXHIBIT C
SUMMARY OF TIMEKEEPERS INCLUDED IN THIS FEE APPLICATION

Professional	Position	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Peter K. Stris	Founding Partner	2001	\$1,450.00	23.8	\$34,510.00
Elizabeth Brannen	Managing Partner	2001	\$1,250.00	174.7	\$218,375.00
Bridget Asay	Partner	1997	\$1,200.00	76.9	\$92,280.00
Tillman Breckenridge	Partner	2003	\$1,200.00	47.9	\$57,480.00
Matthew Seligman	Partner	2013	\$1,100.00	23.8	\$26,180.00
Ken Halpern	Partner	1997	\$1,100.00	1.7	\$1,870.00
Victor O'Connell	Partner	2012	\$1,025.00	26.8	\$27,470.00
John Stokes	Partner	2016	\$1,025.00	119.9	\$122,897.50
Colleen Smith	Associate	2015	\$850.00	47.7	\$40,545.00
Peter Brody	Associate	2016	\$850.00	4.4	\$3,740.00
Sarah Rahimi	Associate	2019	\$750.00	8.7	\$6,525.00
Helen Marsh	Associate	2024	\$700.00	24.4	\$17,080.00
Lisa Sherrod	Lead Discovery Associate	2001	\$625.00	15.3	\$9,562.50
Tanya Tice	Discovery Associate	1989	\$525.00	132.7	\$69,667.50
Monica Viramontes	Senior Paralegal	N/A	\$425.00	25.4	\$10,795.00
Quoc Hoang	Legal Tech Specialist	N/A	\$350.00	0.5	\$175.00
Andrew Atsalis	Litigation Fellow	N/A	\$350.00	31.7	\$11,095.00
Cynthia Huang	Litigation Fellow	N/A	\$350.00	13.1	\$4,585.00
Sebastian Delgado	Litigation Fellow	N/A	\$350.00	14.9	\$5,215.00
Jaida Hodge-Adams	Litigation Fellow	N/A	\$350.00	42	\$14,700.00
Nicholas Capalbo	Litigation Fellow	N/A	\$350.00	14	\$4,900.00
Total				870.3	\$779,647.50

Case Name: *In re Rhodium Encore LLC, et al.*

Case Number: 24-90448 (ARP)

Applicant's Name: Stris & Maher LLP

Date of Application: July 8, 2025

Interim or Final: Interim

EXHIBIT D
BUDGET

A budget was not prepared in this case. Stris & Maher continues to work with the Debtors to ensure efficient and cost-effective service to the Debtors' estates.

Case Name: *In re Rhodium Encore LLC, et al.*

Case Number: 24-90448 (ARP)

Applicant's Name: Stris & Maher LLP

Date of Application: July 8, 2025

Interim or Final: Interim

EXHIBIT E
SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY

Matter #	Matter Description	Hours Budgeted	Fees Budgeted	Hours Billed	Fees Sought
001	Midas Green Patent Litigation	-	-	24.3	\$25,902.50
004	Whinstone Dispute, Excluding Tarrant County Litigation	-	-	801.7	\$708,240.00
007	Retention and Fee Application	-	-	44.3	\$45,505.00
Total				870.3	\$779,647.50

Case Name: *In re Rhodium Encore LLC, et al.*

Case Number: 24-90448 (ARP)

Applicant's Name: Stris & Maher LLP

Date of Application: July 8, 2025

Interim or Final: Interim

EXHIBIT F
INVOICES SUBMITTED WITH MONTHLY FEE STATEMENTS
MARCH 1, 2025 TO MAY 31, 2025



April 23, 2025

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

Invoice # 14530
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through March 31, 2025

RE: Midas Green Litigation

Total Professional Services	\$ 16,695.00
Total Expenses Advanced	<u>\$ 11,715.00</u>
TOTAL THIS INVOICE	\$ 28,410.00
Previous Balance	<u>\$ 21,361.00</u>
TOTAL BALANCE DUE	<u>\$ 49,771.00</u>

Stris & Maher LLP

Invoice # 14530

April 23, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
3/03/25	EB	Review docket and confer with Texas counsel regarding status and anticipated timing (0.4); update [REDACTED] regarding same and GRC request (0.1).	.50	1250.00	625.00
3/04/25	EB	Review correspondence from counsel for GRC and correspond with [REDACTED] regarding response to same.	.10	1250.00	125.00
3/05/25	EB	Correspond with (0.1) and attend teleconference with counsel for GRC regarding confidentiality inquiry (0.1).	.20	1250.00	250.00
3/06/25	EB	Correspond with R. Harrington regarding revised objections to Midas proofs of claim (0.2); advise HM regarding research in support of additional grounds for same (0.3); analyze results and perform further research in support of same (1.9); propose revisions to same (0.7).	3.10	1250.00	3,875.00
3/06/25	ASA	Review and compile internal documents regarding technical expert to provide information requested by KH and EB in support of oppositoin to Midas patent claim.	.50	350.00	175.00
3/06/25	HM	Conduct research for EB regarding Kessler doctrine and law of the case.	2.50	700.00	1,750.00
3/07/25	EB	Analyze further revised objections to Midas proof of claim and correspond with R. Harrington regarding same.	.40	1250.00	500.00
3/10/25	EB	Correspond with JHA and ASA regarding objections to Midas claims.	.10	1250.00	125.00
3/13/25	EB	Review and respond to correspondence from KH regarding inquiry from opposing counsel (0.1); review correspondence from opposing counsel regarding notice to Rhodium (0.1); begin analyzing issues resulting from same (0.4).	.60	1250.00	750.00
3/13/25	KJH	Attend teleconference with Midas counsel H. Pogorzelski regarding GRC subpoena to Midas for Rhodium documents (0.2); correspond with EB regarding same and resulting action items (0.3).	.50	1100.00	550.00

Stris & Maher LLP

Invoice # 14530

April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/14/25	EB	Review and analyze issues relating to further correspondence from counsel for Midas Green relating to Immersion Systems (0.5); discuss same with BA (0.5); advise PB and ASA regarding research in support of Immersion Systems analysis (0.1); review results of same (0.1); correspond with [REDACTED] and [REDACTED] regarding update from Midas-GRC discovery hearing and response to outstanding inquiries (0.2).	1.40	1250.00	1,750.00
3/14/25	BA	Confer with EB regarding requests for production to Midas Greene of Rhodium/Immersion documents in a separate lawsuit.	.50	1200.00	600.00
3/17/25	EB	Prepare initial responses to correspondence from opposing counsel and correspond with [REDACTED] and [REDACTED] regarding same (0.2); review further correspondence from opposing counsel and additional third party recipient (Ameritex) and respond to counsel for Ameritex (0.2); analyze discovery hearing transcript (0.4); correspond with KH regarding same (0.1); send initial responses to opposing counsel (0.1).	1.00	1250.00	1,250.00
3/17/25	KJH	Confer with EB regarding GRC subpoena to Midas (0.1); correspond with EB regarding status and action items in support of proposed written dispositive motions order from Judge Albright (0.2).	.30	1100.00	330.00
3/18/25	EB	Review correspondence from KH regarding status and potential steps in support of request for written ruling (0.1); prepare for (0.1); and attend (0.3) teleconference with counsel for Ameritex; correspond with KH regarding resulting action items (0.1).	.60	1250.00	750.00
3/18/25	KJH	Analyze, confer with PB regarding, and update EB regarding Ameritex information in support of response to Ameritex counsel and to Midas regarding Rhodium's position on subpoena seeking Ameritex documents from Midas-Rhodium litigation.	.80	1100.00	880.00

Stris & Maher LLP

Invoice # 14530

April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/19/25	EB	Respond to correspondence from counsel for Ameritex with interim update and review interim update from opposing counsel (0.1); correspond with [REDACTED] regarding open questions and action items including potential motion practice and deadline (0.2); correspond with opposing counsel and ASA regarding status and subpoena scope (0.2); confer with KH regarding action items including record assessment in support of response to Ameritex (0.1).	.60	1250.00	750.00
3/19/25	KJH	Teleconference with EB regarding record assessment in support of response to GRC subpoena to Midas seeking Rhodium and Ameritex documents.	.10	1100.00	110.00
3/19/25	ASA	Detailed tracking of Rhodium, Ameritex, and Midas positions based upon correspondence regarding third- party subpoena and potential production of Rhodium and Ameritex documents as outside counsel eyes only.	.50	350.00	175.00
3/20/25	EB	Review correspondence from counsel for Midas and proposed orders submitted by GRC and Midas (0.2); correspond with clients (0.1) and counsel for Ameritex (0.1) regarding same.	.40	1250.00	500.00
3/21/25	EB	Review and analyze order and update [REDACTED] and [REDACTED] regarding same (0.2); confer with counsel for Ameritex regarding Rhodium position with respect to confidentiality and subpoena scope and advise ASA regarding updates to [REDACTED] memorandum (0.2).	.40	1250.00	500.00
3/23/25	EB	Correspond with opposing counsel and counsel for Ameritex regarding Rhodium position (0.1); correspond with opposing counsel to request notice to Immersion Systems in the event of future broader scope subpoena (0.1).	.20	1250.00	250.00
3/26/25	EB	Update [REDACTED] and [REDACTED] regarding status of case and interim update from discussions with [REDACTED] and opposing counsel.	.10	1250.00	125.00
TOTAL PROFESSIONAL SERVICES				\$ 16,695.00	

Stris & Maher LLP

Invoice # 14530

April 23, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	9.70	1,250.00	12,125.00
Bridget Asay	BA	Partner	.50	1,200.00	600.00
Ken Halpern	KJH	Partner	1.70	1,100.00	1,870.00
Helen Marsh	HM	Associate	2.50	700.00	1,750.00
Andrew Atsalis	ASA	Fellow	1.00	350.00	350.00
Total			15.40		\$ 16,695.00

EXPENSES ADVANCED

Date	Task	Description	Amount
2/28/25		JND Discovery Invoice for February 2025.	3,765.00
3/04/25		Peregrine Consultants - February 2025.	7,950.00
		TOTAL EXPENSES ADVANCED	\$ 11,715.00
		TOTAL THIS INVOICE	\$ 28,410.00

Stris & Maher LLP

Invoice # 14530

April 23, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14380	1/13/25	8,990.00	7,192.00	1,798.00
14471	2/21/25	25,380.00	21,057.00	4,323.00
14498	3/28/25	15,240.00	.00	15,240.00
Previous Balance				\$ 21,361.00
Balance Due This Invoice				<u>\$ 28,410.00</u>
TOTAL BALANCE DUE				<u><u>\$ 49,771.00</u></u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$ 15,240.00	\$.00	\$ 4,323.00	\$ 1,798.00	\$.00	\$ 21,361.00



April 23, 2025

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

Invoice # 14517
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through March 31, 2025

RE: Whinstone Litigation

Total Professional Services	\$ 493,202.50
Total Expenses Advanced	<u>\$ 10,255.41</u>
TOTAL THIS INVOICE	\$ 503,457.91
Previous Balance	<u>\$ 902,700.62</u>
TOTAL BALANCE DUE	<u>\$ 1,406,158.53</u>

Trust Funds Remaining on Account \$ 115,369.59

Stris & Maher LLP

Invoice # 14517

April 23, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
3/01/25	JS	Review and evaluate issues arising from mediation.	1.00	1025.00	1,025.00
3/02/25	JS	Evaluate strategy for Whinstone litigation in connection with potential plan confirmation issues.	1.70	1025.00	1,742.50
3/02/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	2.60	525.00	1,365.00
3/03/25	VO	Confer with JS regarding strategy for damages case.	.80	1025.00	820.00
3/03/25	EB	Update TB regarding case status and upcoming action items including record designations (0.1); advise NC, further revise, and correspond with BA, JS, and PB regarding revisions to initial analysis of Whinstone privilege log to support further review and assessment of issues and deficiencies relating to same (0.9); correspond with SR, CHH, and A. Swartz regarding pro hac applications (0.1); work on discovery strategy and staffing for damages case and assess highest priority action items (2.0); review and analyze update from HM regarding Whinstone's [REDACTED] discovery representations and correspond with SR, ASA, and NC regarding revisions to related memorandum and timeline (0.4); analyze and correspond with TT regarding updates from further review (0.2).	3.70	1250.00	4,625.00
3/03/25	BA	Correspond and confer with CS regarding analysis of issues with respect to adversary proceeding (0.3); correspond with EB, PB, and JS regarding analysis of Whinstone's privilege log as relevant to claims in adversary proceeding (0.1).	.40	1200.00	480.00
3/03/25	JS	Confer with VO regarding strategy for damages case (0.8); evaluate next steps in light of mediation outcome (0.5).	1.30	1025.00	1,332.50
3/03/25	SR	Attend to pro hac vice applications for PKS, JS, BA, and CS and correspond with team regarding the same (1.0); review CS edits to memorandum relating to damages complaint and further revise same to incorporate additional facts and research (2.2).	3.20	750.00	2,400.00
3/03/25	TB	Telephone call with EB to discuss status and upcoming action items.	.10	1200.00	120.00

Stris & Maher LLP

Invoice # 14517

April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/03/25	CS	Correspond and confer with BA to discuss research on various questions related to adversary proceeding (0.3); begin reviewing and analyzing case law and drafting memorandum regarding the same (3.7).	4.00	850.00	3,400.00
3/03/25	CHH	Finalize pro hac vice applications for bankruptcy appeal and confer with SR and PH regarding same (0.5); telephone call with SDTX clerk regarding same (0.2).	.70	350.00	245.00
3/03/25	NC	Update privilege log analysis as directed by EB and circulate to attorney team.	1.30	350.00	455.00
3/03/25	ASA	Continue preparing timeline of key representations related to [REDACTED].	2.40	350.00	840.00
3/03/25	HM	Review, analyze, and summarize phase 1 discovery correspondence and documents for EB.	2.00	700.00	1,400.00
3/03/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	8.00	525.00	4,200.00
3/04/25	EB	Advise litigation fellows in support of discovery-related action items (0.2); review and analyze updates from TT and advise regarding further document review and analysis (0.3); attention to preservation notices sent to third-parties (0.2).	.70	1250.00	875.00
3/04/25	BA	Participate in weekly teleconference with client, litigation counsel, and bankruptcy counsel to discuss appeal, adversary proceeding, case strategy, and settlement discussions.	1.00	1200.00	1,200.00
3/04/25	JS	Attend weekly client touchpoint call (1.0); evaluate next steps in light of mediation outcome (0.5).	1.50	1025.00	1,537.50
3/04/25	SR	Review and analyze documents to be added to memorandum summarizing factual research relating to damages complaint and correspond with MV regarding the same.	.60	750.00	450.00
3/04/25	CS	Continue analyzing case law and drafting memorandum in support of adversary proceeding [REDACTED].	3.60	850.00	3,060.00
3/04/25	CHH	Update draft pro hac vice applications for bankruptcy appeal (0.2); telephone call with SDTX clerk regarding same (0.2); file pro hac vice applications for bankruptcy appeal (0.3).	.70	350.00	245.00
3/04/25	JHA	Check for ongoing updates in litigation pending against [REDACTED] at SR request.	1.80	350.00	630.00

Stris & Maher LLP

Invoice # 14517

April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/04/25	ASA	Review client documents to revise [REDACTED] for reference by document reviewers in support of damages case (0.7); update document review memorandum with information requested by EB (0.8).	1.50	350.00	525.00
3/04/25	HM	Coordinate with ASA, JHA, and CH regarding ongoing task assignments.	.50	700.00	350.00
3/04/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	9.30	525.00	4,882.50
3/04/25	MV	Create saved searches in support of attorney review of additional documents.	1.00	425.00	425.00
3/05/25	EB	Review updated draft and advise NC regarding privilege log analysis (0.2); review team and client correspondence and begin analyzing response to client inquiry (0.7).	.90	1250.00	1,125.00
3/05/25	BA	Correspond with opposing counsel and [REDACTED] regarding state court bond deposit.	.10	1200.00	120.00
3/05/25	JS	Work on high priority action items for damages case.	2.50	1025.00	2,562.50
3/05/25	NC	Update privilege log analysis.	1.20	350.00	420.00
3/05/25	JHA	Update dockets, including the bankruptcy original and adversary proceedings and the district court appeal.	2.50	350.00	875.00
3/05/25	PB	Coordinate transfer of ESI to co-counsel for response to Rule 2004 requests.	.50	850.00	425.00
3/05/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	8.10	525.00	4,252.50
3/06/25	VO	Attend teleconference with PS, EB, JS, CS, PB, SR, HM, MV, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research.	.80	1025.00	820.00
3/06/25	PS	Prepare for (0.4) and attend (0.8) weekly team zoom.	1.20	1450.00	1,740.00

Stris & Maher LLP

Invoice # 14517

April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/06/25	EB	Confer with NC regarding status of privilege log analysis (0.1) and BA regarding high priority action items (0.1); attend teleconference with W. Thompson and [REDACTED] regarding motion to withdraw the reference (0.1); prepare for (0.5) and attend (0.8) Stris team meeting regarding status and high priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research; review related materials and review and respond to team correspondence regarding high priority action items in support of document assessment, claim objections, and analysis in response to client inquiry (0.5).	2.10	1250.00	2,625.00
3/06/25	BA	Review, research, and edit draft omnibus objection to SAFEs' claim, correspond with JS regarding same, and convey comments on same to P. Tomasco (2.4); review draft opposition to motion to withdraw the reference and correspond with P. Tomasco and team regarding same (0.9); review draft memorandum from P. Tomasco regarding [REDACTED] and research related issues (0.4).	3.70	1200.00	4,440.00
3/06/25	JS	Attend teleconference with PS, EB, VO, CS, PB, SR, HM, MV, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research (0.8); review and evaluate SAFE claim objection (0.9); review and evaluate [REDACTED] issues (1.0); review and evaluate contract [REDACTED] issues (1.5); continue to work on high priority action items for damages case (1.0).	5.20	1025.00	5,330.00
3/06/25	SR	Attend teleconference with PS, EB, VO, JS, CS, PB, HM, MV, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research.	.80	750.00	600.00

Stris & Maher LLP

Invoice # 14517

April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/06/25	CS	Attend teleconference with PS, EB, VO, JS, PB, SR, HM, MV, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research (0.8); review and analyze memorandum regarding [REDACTED] (1.0); review and analyze power contracts regarding [REDACTED] or [REDACTED] [REDACTED] economic value (2.4).	4.20	850.00	3,570.00
3/06/25	CHH	Attend teleconference with PS, EB, VO, JS, CS, PB, SR, HM, MV, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research.	.80	350.00	280.00
3/06/25	JHA	Attend teleconference with PS, EB, VO, JS, CS, PB, SR, HM, MV, CHH & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research (0.8); update dockets, including bankruptcy original and adversary proceedings, and district court appeal (0.7).	1.50	350.00	525.00
3/06/25	PB	Attend teleconference with PS, EB, VO, JS, CS, SR, HM, MV, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research (0.8); correspondence with JS regarding [REDACTED] obligations (0.2).	1.00	850.00	850.00
3/06/25	ASA	Attend teleconference with PS, EB, VO, JS, CS, PB, SR, HM, MV, CHH, and JHA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research (0.8); update document review memorandum to reflect attorney priorities (0.4).	1.20	350.00	420.00

Stris & Maher LLP

Invoice # 14517

April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/06/25	HM	Attend teleconference with PS, EB, VO, JS, CS, PB, SR, MV, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities, and ongoing legal research (0.8); update damages case document review memorandum (0.5).	1.30	700.00	910.00
3/06/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	8.50	525.00	4,462.50
3/06/25	MV	Attend teleconference with PS, EB, VO, JS, CS, PB, SR, HM, CHH, JHA, & ASA to discuss high-priority action items related to the adversary proceeding and district court appeal, including coordination with bankruptcy counsel, assignment of document review responsibilities and ongoing legal research.	.80	425.00	340.00
3/07/25	EB	Review and respond to updates from TT (0.1); analyze same and correspond with BA and JS regarding potential addition to amended complaint (0.4); correspond with litigation fellows and HM regarding [REDACTED] action items including [REDACTED] updates (0.1).	.60	1250.00	750.00
3/07/25	JS	Continue strategic planning for damages case (3.9); confer with [REDACTED] regarding latest settlement negotiations with Riot (0.2).	4.10	1025.00	4,202.50
3/07/25	ASA	Prepare exports for review in support of damages case (0.6); begin review of additional Rhodium documents to identify information in support of damages case (0.9).	1.50	350.00	525.00
3/07/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	7.10	525.00	3,727.50
3/09/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	2.90	525.00	1,522.50
3/10/25	EB	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	.60	1250.00	750.00
3/10/25	JS	Continue work on analysis of [REDACTED] energization.	2.00	1025.00	2,050.00

Stris & Maher LLP

Invoice # 14517

April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/10/25	JHA	Review and update bankruptcy dockets, including district court appeal, bankruptcy appeal and adversary proceeding dockets (1.0); confer with EB regarding status of bankruptcy objections to Midas Green proof of claim in the related matter (0.3).	1.30	350.00	455.00
3/10/25	ASA	Continue analysis of additional Rhodium documents to identify information in support of damages case.	3.70	350.00	1,295.00
3/10/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	9.30	525.00	4,882.50
3/11/25	EB	Review correspondence, begin analyzing issues, and correspond with BA, TB, and JS regarding appellate record designations (0.6); review correspondence and materials from P. Tomasco regarding same (0.1); attention to case management (0.5).	1.20	1250.00	1,500.00
3/11/25	BA	Participate in weekly call with bankruptcy counsel, litigation counsel, and client (0.4); review Whinstone's designation of record for appeal, correspond with EB, TB, and JS regarding issues related to same, correspond with P. Tomasco regarding same, and review related research (0.4); correspond with P. Tomasco and with W. Thompson and A. Swartz regarding preparation of motion to recover bond deposit with state court (0.3).	1.10	1200.00	1,320.00
3/11/25	JS	Continue evaluating █████ energization issue (2.0); review and evaluate letter from SAFE group regarding disclosure of Stris and LKC information (1.2) and confer with P. Tomasco regarding same (0.2); continue preparing go-forward strategy and evaluating key issues in connection with damages case (1.7); attend portion of weekly touchpoint call (0.6).	5.70	1025.00	5,842.50
3/11/25	TB	Plan regarding document designation response; review document designations; review opinion on appropriate designations.	.70	1200.00	840.00
3/11/25	CS	Continue analyzing case law and drafting memorandum regarding adversary proceeding.	1.90	850.00	1,615.00
3/11/25	ASA	Continue analysis of additional Rhodium documents to identify information in support of damages case.	2.20	350.00	770.00

Stris & Maher LLP

Invoice # 14517

April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/11/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	8.20	525.00	4,305.00
3/12/25	VO	Confer with JS regarding assignments and strategy (1.0); review and respond to email from P. Tomasco regarding draft letter (0.6); confer with PS regarding same (0.3).	1.90	1025.00	1,947.50
3/12/25	EB	Correspond with TT regarding review status and action items (0.1); confer with HM regarding high priority discovery-related action items (0.1); analyze materials and advise HM and litigation fellows regarding revisions to review memorandum (0.5); review team correspondence and correspondence with co-counsel regarding objections to SAFE discovery requests and analyze draft of same (0.2); attention to case management (0.3).	1.20	1250.00	1,500.00
3/12/25	BA	Begin outlining and analyzing issues for motion to release supersedeas deposit in state court (1.5); review and analyze issues relating to energizing [REDACTED] and correspond with JS regarding same (0.5); review proposed response and correspondence regarding SAFE discovery requests and correspond with JS regarding status of certain discovery matters (0.4).	2.40	1200.00	2,880.00
3/12/25	JS	Evaluate response letter regarding SAFE document requests (0.5) and confer with B. Roth regarding same (0.1); evaluate issues regarding appellate record designation (0.4); further revise [REDACTED] energization analysis (0.7); evaluate discovery issues that remain to be addressed in damages case (1.5).	3.20	1025.00	3,280.00
3/12/25	TB	Review record designations and docket to assess potential further designations.	1.90	1200.00	2,280.00
3/12/25	CS	Continue analyzing case law and drafting memorandum regarding adversary proceeding.	4.50	850.00	3,825.00
3/12/25	HM	Confer with EB about high priority discovery items (0.1); coordinate with PH to ensure compliance with case deadlines (0.1).	.20	700.00	140.00
3/12/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	9.50	525.00	4,987.50

Stris & Maher LLP

Invoice # 14517

April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/13/25	VO	Prepare for (0.3) and attend call with P. Tomasco, JS, W. Thomson, and others regarding response to letter (0.7); emails with P. Tomasco and legal team regarding same (0.3).	1.30	1025.00	1,332.50
3/13/25	PS	Prepare for (0.5) and attend (0.9) weekly team zoom.	1.40	1450.00	2,030.00
3/13/25	EB	Prepare for (0.5) and lead (0.9) Stris team meeting; attend teleconference with TT, HM, ASA and JHA regarding status and action items in support of further review (0.5); attend teleconference with MV regarding high priority action items including fellow management (0.2); work on offensive discovery strategy (1.4); review and respond to team correspondence and correspond with Stris team regarding action items including document and privilege log review and analysis (0.2).	3.70	1250.00	4,625.00
3/13/25	BA	Attend portion of teleconference with MV, EB, PS, JS, TB, CS, PB, HM, SR, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal (0.6); continue reviewing Whinstone's record designations for appeal, research issues relating to record designations and motion to strike improper designations, and correspond with P. Tomasco regarding same (0.5); confer with CH regarding Whinstone's record designations (0.1); review correspondence from R. Mates regarding discovery matters and correspond with JS and PB regarding same (0.1); continue analyzing appeal issues raised by Whinstone and correspond with TB, EB, and JS regarding potential waiver of appellate issues (0.5); review potential exhibits for supersedeas bond filing and correspond with JH and HM regarding preparation of exhibits and declaration for supersedeas bond filing (0.3).	2.10	1200.00	2,520.00
3/13/25	JS	Attend teleconference with MV, EB, PS, TB, CS, PB, HM, SR, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal (0.9); push forward key action items related to damages issues on Building D and Winter Storm Uri (1.9).	2.80	1025.00	2,870.00
3/13/25	SR	Attend teleconference with MV, EB, PS, JS, TB, CS, PB, HM, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal.	.90	750.00	675.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/13/25	TB	Review Second Interim Order and plan regarding record needs and counter designations and work on same (4.2); attend part of Stris team call regarding appellate action items including waiver research (0.3).	4.50	1200.00	5,400.00
3/13/25	CS	Attend teleconference with MV, EB, PS, JS, TB, PB, HM, SR, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal (0.6); continue reviewing and analyzing case law in preparation for responding answer in adversary proceeding and drafting memorandum regarding the same (3.2).	3.80	850.00	3,230.00
3/13/25	CHH	Attend teleconference with MV, EB, PS, JS, TB, CS, PB, HM, SR, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal.	.60	350.00	210.00
3/13/25	JHA	Attend teleconference with MV, EB, PS, JS, TB, CS, PB, HM, SR, and CHH to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal (0.6); update internal tracking memorandum with exhibits offered and admitted, including for a limited purpose, in support of appellate motion practice as directed by BA (1.0); attend teleconference with TT, ASA, EB, CHH and HM to discuss ongoing review of Rhodium materials (0.5); begin reviewing additional assigned materials in support of damages claims (2.0); prepare exhibits and provide materials for upcoming motion regarding supersedeas deposit at BA request (1.5).	5.60	350.00	1,960.00
3/13/25	PB	Attend teleconference with MV, EB, PS, JS, TB, CS, HM, SR, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal.	.90	850.00	765.00
3/13/25	ASA	Finalize Damages Phase document review memorandum and circulate to EB, HM, CHH, JHA, and TT (0.8); attend teleconference with EB, TT, HM, and JHA to discuss and assign roles for analysis and review in support of same (0.5); correspond with MV about review project (0.2); continue analysis of additional Rhodium documents to identify information in support of damages case (2.9).	4.40	350.00	1,540.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/13/25	HM	Attend teleconference with EB, TT, ASA and JHA regarding status and action items in support of further document review (0.5); prepare for (0.1) and attend (0.9) teleconference with MV, EB, PS, JS, TB, CS, PB, SR, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal.	1.50	700.00	1,050.00
3/13/25	TT	Attend teleconference with EB, HM, ASA and JHA regarding status and action items in support of further Rhodium document review (0.5); analyze and summarize additional Rhodium materials for EB in support of damages claim (8.0).	8.50	525.00	4,462.50
3/13/25	MV	Attend teleconference with EB, PS, JS, TB, CS, PB, HM, SR, CHH, and JHA to discuss high-priority action items related to the bankruptcy trial, adversary proceeding and district court appeal (0.9); attend teleconference with EB regarding high priority action items including fellow management (0.2); assess and follow-up with fellows and attorneys regarding ongoing document assignments and action items (0.2).	1.30	425.00	552.50
3/14/25	EB	Prepare for (0.5) and attend portion of teleconference to advise HM and MV regarding damages case document review and case management (0.6); analyze current privilege log materials (0.4); correspond with PB, MV, NC, and ASA regarding family analysis of same (0.2); review correspondence from BA and analyze issues and record relating to appellate waiver arguments (1.0); review and respond to correspondence from BA regarding supplemental record designations (0.1).	2.80	1250.00	3,500.00
3/14/25	BA	Continue researching and reviewing issues for record designation and motion to strike portions of Whinstone's designations, and correspond with CH and JH regarding research and documents for same.	1.90	1200.00	2,280.00
3/14/25	JS	Prepare for (0.5) and attend (0.4) call regarding █████ exit financing questions; continue evaluating next steps for damages case and possible Whinstone settlement (0.9).	1.80	1025.00	1,845.00
3/14/25	SR	Review and analyze documents to be added to memorandum summarizing factual research relating to damages complaint.	2.40	750.00	1,800.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/14/25	TB	Review docket and document designations and plan regarding responsive designations (5.0); plan regarding research on waiver issues (0.9).	5.90	1200.00	7,080.00
3/14/25	CS	Continue reviewing and analyzing case law in preparation for composing response to Whinstone and Riot's answer to or motion to dismiss damages action; continue drafting memorandum regarding the same (6.0).	6.00	850.00	5,100.00
3/14/25	CHH	Provide documents to BA in support of additional designations to record on appeal (0.5); review and analyze Whinstone's designations and pull pleadings relating to same (1.0).	1.50	350.00	525.00
3/14/25	NC	Update and circulate updated privilege log analysis for attorney review.	.20	350.00	70.00
3/14/25	JHA	Continue reviewing and analyzing assigned Rhodium documents in support of damages case (2.1); compile exhibits and supporting materials for motion to strike Whinstone designations (1.0).	3.10	350.00	1,085.00
3/14/25	ASA	Analyze past briefing at request of PB and EB to confirm pertinent information about Immersion Systems.	2.10	350.00	735.00
3/14/25	HM	Confer with HM, EB, and MV regarding damages case document review and case management.	1.70	700.00	1,190.00
3/14/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	7.80	525.00	4,095.00
3/14/25	MV	Confer with HM and EB regarding damages case document review and case management (1.7); review damages case review memorandum and related documents (1.0); correspond with team regarding ongoing oversight of fellows regarding document review and assign batches for review (0.3); review and respond to correspondence related to privilege log (0.5); conduct document review in support of damages case and begin summary of findings regarding same (3.5).	7.00	425.00	2,975.00
3/15/25	TB	Research regarding waiver and planning regarding response to waived issues.	2.10	1200.00	2,520.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/15/25	CS	Continue analyzing case law and drafting memorandum in support of adversary proceeding in preparation for responding to answers or motions to dismiss.	2.90	850.00	2,465.00
3/16/25	VO	Review and analyze [REDACTED], and [REDACTED] documents and summaries of key information relating to same.	1.60	1025.00	1,640.00
3/16/25	PS	Review documents provided and curated by J. Stokes for purposes of assessing key strategic issues pertaining to damages claim, potential settlement, and proposed plan terms.	4.50	1450.00	6,525.00
3/16/25	EB	Confer with JS regarding high priority action items and assignments including searching in support of objection to SAFE claim, approval for fraudulent inducement amendment, and appellate waiver research (0.5); analyze materials relating to support for fraudulent inducement claim (3.5); correspond with BA, TB, MS, and JS regarding analysis of same (1.6); correspond with CHH regarding systems access and related action items (0.1).	5.70	1250.00	7,125.00
3/16/25	BA	Correspond with EB and MS regarding issues related to fraudulent inducement claim (0.3); continue analyzing issues for and drafting filings for response to Whinstone's designation of record materials (0.5).	.80	1200.00	960.00
3/16/25	JS	Confer with EB regarding high priority action items and assignments including searching in support of objection to SAFE claim, approval for fraudulent inducement amendment, and appellate waiver research (0.5); review complaint and existing research in connection with same (0.4).	.90	1025.00	922.50
3/16/25	TB	Conduct further legal research regarding waiver via agreement and failure to raise.	5.10	1200.00	6,120.00
3/16/25	CS	Continue research in support of response to Whinstone and Riot answers to or motions to dismiss damages action and drafting memorandum regarding same.	3.10	850.00	2,635.00
3/16/25	MS	Analyze documents and materials regarding fraudulent inducement issue.	2.70	1100.00	2,970.00
3/16/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	6.30	525.00	3,307.50

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Date	Tkpr	Description	Hours	Rate	Amount
3/17/25	VO	Review documents provided and curated by JS for purposes of assessing key strategic issues pertaining to damages claim, potential settlement, and proposed plan terms (4.8); confer with JS and EB regarding damages and other high-priority items (0.5).	5.30	1025.00	5,432.50
3/17/25	PS	Review documents provided and curated by JS for purposes of assessing key strategic issues pertaining to damages claim, potential settlement, and proposed plan terms.	4.30	1450.00	6,235.00
3/17/25	EB	Review and respond to team correspondence regarding discovery and document-related action items (0.2); evaluate high priority damages-related tasks (0.5); correspond with ASA regarding prioritization of litigation fellow tasks (0.1); analyze additional materials to prepare for (1.3) and confer with JS and MS regarding fraudulent inducement analysis (0.7); correspond with HM regarding and provide additional information to MS in support of same (0.1); review updates from TT, confer with Stris Team regarding background, and advise TT regarding further Rhodium document review and analysis (0.2); confer with VO and JS regarding Building D analysis and high priority action items (0.5); review update from TB regarding appellate record designations and correspondence from BA regarding next steps (0.1); review and analyze Building D correspondence, materials, and legal research from co-counsel and determine next steps in support of development of proof regarding same (2.0); attend teleconference with HM regarding factual memorandum assessing same (0.2); review and provide supporting materials and further instructions to HM (0.3); begin reviewing Riot and Whinstone filings moving to withdraw the reference and dismiss damages complaint (1.0).	7.20	1250.00	9,000.00
3/17/25	BA	Correspond with CH and with JH regarding status of analysis relevant to record designations for appeal (0.2); begin reviewing transcripts as relevant to both supplemental designations and motion to strike Whinstone's designations (1.5).	1.70	1200.00	2,040.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/17/25	JS	Confer with EB and MS regarding fraudulent inducement analysis (0.7); correspond with EB and MS regarding same (0.2); confer with VO and EB regarding Building D and other high priority issues (0.5); review and evaluate Riot and Whinstone responses to damages complaint (2.5); review documents in connection with SAFE analysis related to Whinstone settlement issues (1.2); review SAFE claim objection (1.0); evaluate high priority next steps in connection with damages complaint (1.4); review and evaluate draft motion to return bond in Milam County (0.8).	8.30	1025.00	8,507.50
3/17/25	TB	Research regarding waiver of arguments by contract and judicial waiver (4.6); review documents and advise regarding document designations for appeal (0.6).	5.20	1200.00	6,240.00
3/17/25	CHH	Continue assisting BA with designations for bankruptcy appeal (0.4); assist JS and LS with targeted searching and analysis for Whinstone settlement (0.4); organize and provide documents to various attorneys per EB request (0.1).	.90	350.00	315.00
3/17/25	MS	Analyze documents and expert reports regarding fraudulent inducement issue (2.3); conduct legal research regarding same (4.9); attend teleconference with EB and JS regarding fraudulent inducement analysis (0.7).	7.90	1100.00	8,690.00
3/17/25	JHA	Review Phase 1 hearing transcripts and update internal tracking memorandum with exhibits offered and admitted in support of appellate motion practice as directed by BA (1.3); continue reviewing assigned materials in support of damages phase (2.5).	3.80	350.00	1,330.00
3/17/25	PB	Analyze Whinstone motions to dismiss and to withdraw reference.	.80	850.00	680.00
3/17/25	ASA	Continue review and analysis of assigned Rhodium documents for information for damages case.	2.60	350.00	910.00
3/17/25	HM	Begin reviewing documents and drafting Building D analysis (1.3); confer with EB about Building D analysis (0.2).	1.50	700.00	1,050.00
3/17/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim.	10.50	525.00	5,512.50
3/17/25	LS	Perform targeted search, review of search results, and compilation of findings for attorney J. Stokes.	7.70	625.00	4,812.50

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Date	Tkpr	Description	Hours	Rate	Amount
3/18/25	VO	Review settlement term sheet and emails with team regarding same (0.4); review and analyze omnibus claim objection and underlying SAFE documents, including reviewing EB redlines to same (1.4); confer with JS regarding same (0.3); attend videoconference with co-counsel and client representatives (0.8).	2.90	1025.00	2,972.50
3/18/25	PS	Review documents provided and curated by JS for purposes of assessing key strategic issues pertaining to damages claim, potential settlement, and proposed plan terms.	4.20	1450.00	6,090.00
3/18/25	EB	Continue reviewing and analyzing Riot and Whinstone motions and ensure staffing and coverage to respond to same (1.2); advise NC and ASA correspond with BA, JS, NC, and ASA regarding preparation of opposition papers responding to same and potential motion to strike jury demand (0.2); review updates from TT regarding document review and analysis and advise regarding same (0.1); correspond with LS regarding additional targeted searching (0.1); attend teleconference with LS regarding same (0.4); prepare for (0.2) and attend (0.4) teleconference with litigation fellows and TT regarding review and matter status, client instructions, and prioritization of non-extended deadline-related tasks; attend teleconference with BA regarding status and high priority action items (0.2); review term sheet (0.1); propose revisions to term sheet including to address intellectual property issues in consultation with BA and JS (0.5); correspond with BA, JS, and co-counsel and review further correspondence regarding further revisions to same (0.1); review update from LS and correspond with JS, LS, and CHH regarding next steps in support of targeted SAFE searches and review (0.1); review and analyze additional Building D materials and further instruct HM regarding analysis of same (0.2); analyze and propose revisions to SAFE claim objection and correspond with JS regarding same (2.5); attend portion of checkpoint teleconference with BA, JS, client and co-counsel (0.7); advise associates and litigation fellows regarding damages case stand down and status memorialization (0.2); attend teleconference with JS, client and co-counsel to discuss SAFE issues (1.5); consult with JS regarding resulting action items including high priority research and assess staffing for same (0.1).	8.80	1250.00	11,000.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/18/25	BA	Review draft term sheet from P. Tomasco and correspond with JS, EB, and VO regarding potential revisions to same (0.2); confer with EB regarding draft term sheet (0.2); confer with EB and JS regarding potential issues to flag in term sheet (0.5); continue reviewing record materials to prepare supplemental designations of record and motion to strike, correspond with JH regarding exhibit list, correspond with CH and CS regarding potential filings for designation, and convey draft record designations to litigation team for input (4.6); participate in teleconference with client, bankruptcy counsel, and litigation team (0.8).	6.20	1200.00	7,440.00
3/18/25	JS	Evaluate SAFE issues in connection with Whinstone settlement (2.3); attend weekly touchpoint call (0.8); attend call with QE, SMLLP, and Province teams regarding SAFE issues in connection with Whinstone settlement (1.5); further conversation with EB regarding same (0.1).	4.70	1025.00	4,817.50
3/18/25	TB	Continue waiver research.	5.90	1200.00	7,080.00
3/18/25	CHH	Assist BA with additional designations for appeal (0.5); teleconference with EB, HM, JHA, and ASA regarding case updates and high priority action items (0.4); summarize LS research findings regarding SAFEs for EB and JS review (0.3).	1.20	350.00	420.00
3/18/25	NC	Assist ASA with materials in support of responses to Riot and Whinstone motions.	.40	350.00	140.00
3/18/25	MS	Conduct further research and analysis regarding fraudulent inducement.	9.30	1100.00	10,230.00
3/18/25	JHA	Finish reviewing Phase 1 hearing transcripts to update and qc internal tracking memorandum with exhibits offered and admitted in support of appellate motion practice as directed by BA (2.5); attend teleconference with EB, HM, CHH, and ASA regarding case updates and high priority action items (0.4).	2.90	350.00	1,015.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/18/25	ASA	Prepare materials for Rhodium's responses to Riot's Motion to Dismiss and Motion to Withdraw Reference (0.8); prepare materials for Rhodium's responses to Whinstone's Motion to Dismiss and Motion to Withdraw Reference (0.8); correspond with EB regarding Building D materials and information (0.2); teleconference with EB, HM, JHA, and CHH regarding case updates and high priority action items (0.4); record detailed update of document review efforts to facilitate reference by attorneys (0.3).	2.50	350.00	875.00
3/18/25	HM	Continue drafting Building D memorandum (4.1); teleconference with EB, JHA, CH, and ASA regarding case updates and high priority action items (0.4).	4.50	700.00	3,150.00
3/18/25	TT	Analyze and summarize additional Rhodium materials for EB in support of damages claim (7.9); attend portion of teleconference with EB, HM, JHA, CH and ASA regarding case updates and high priority action items (0.2); assist HM in the identification of Building D documents for detailed timeline (0.8); amend summary and analysis of Building D documents for detailed timeline (0.2).	9.10	525.00	4,777.50
3/18/25	LS	Telephone call with attorney E. Brannen to discuss high priority targeted search requests (0.4) targeted search, review of search results, and compilation of findings relating to Temple for attorney EB (1.6); targeted search, review of search results, and compilation of findings related executed Building D contracts for EB, JS, and HM (5.6).	7.60	625.00	4,750.00
3/19/25	VO	Confer with PS and JS regarding key strategic issues.	.50	1025.00	512.50
3/19/25	PS	Review documents provided and curated by J. Stokes for purposes of assessing key strategic issues pertaining to damages claim, potential settlement, and proposed plan terms (3.6); confer with JS and VO regarding same (0.5).	4.10	1450.00	5,945.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/19/25	EB	Assess status and high priority action items in support of Whinstone settlement and SAFE issues (1.0); attend teleconference with TB regarding investor priority claims and research (0.2); review and analyze initial research from P. Tomasco (0.3); revise objections to SAFE claim to incorporate edits from VO (0.2); continue assessing strategic issues (0.8); correspond with patent prosecution counsel regarding status of pending patent applications (0.1); advise associates and TT regarding status and high priority action items (0.4); assess further documents located by LS (1.0); attend teleconference with TT regarding analysis of documents in support of settlement (0.2); confer with BA regarding appeal status and coverage of non-stayed deadlines (0.2); review BA and JS comments and propose further revisions to term sheet (0.6); correspond with co-counsel regarding same (0.1).	5.10	1250.00	6,375.00
3/19/25	BA	Review revisions to term sheet and convey suggested edits to JS and EB (0.3); correspond with P. Tomasco regarding upcoming deadlines and confer with EB regarding appeal deadlines and term sheet (0.2); review draft motion to approve settlement and convey suggested edits to EB and JS (0.4); review initial admitted exhibit list from JH, correspond with JH regarding revisions to same, and correspond with HM regarding review and revision of same (0.4).	1.30	1200.00	1,560.00
3/19/25	JS	Confer with PS and VO regarding key strategic issues.	.50	1025.00	512.50
3/19/25	TB	Confer with E. Brannen regarding priority of appeal issues and issues regarding investor interest in bankruptcy (0.2); Plan research and research regarding bankruptcy rules regarding investor interest (5.4).	5.60	1200.00	6,720.00
3/19/25	MS	Conduct legal research regarding fraudulent inducement issue (1.4); review and analyze [REDACTED] complaint and research and analyze issues as requested by EB and JS in support of settlement (2.5).	3.90	1100.00	4,290.00
3/19/25	HM	Conduct research and draft notice of withdrawal as counsel for HM.	1.10	700.00	770.00
3/19/25	TT	Analyze and summarize third party materials for EB in support of potential Whinstone settlement.	6.50	525.00	3,412.50

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Date	Tkpr	Description	Hours	Rate	Amount
3/20/25	VO	Attend teleconference with team regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms (0.8); confer with PS and JS regarding key strategic issues (0.8).	1.60	1025.00	1,640.00
3/20/25	PS	Review documents provided and curated by JS for purposes of assessing key strategic issues pertaining to damages claim, potential settlement, and proposed plan terms (3.1); confer with VO and JS regarding same (0.8).	3.90	1450.00	5,655.00
3/20/25	EB	Review client and counsel initial comments on motion to assume, propose further revisions, and correspond with client and co-counsel regarding same (0.9); prepare for (0.5) and lead (0.8) Stris team meeting regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms; review updates from TT regarding further analysis (0.2); correspond with JS and TT regarding next steps in support of same (0.1); continue analyzing SAFE issues, further revise, and correspond with co-counsel regarding objection to SAFE claim (2.6); attend portion of teleconference with JS, clients, and co-counsel regarding same (0.5); review and respond to further team correspondence and additional SAFE discovery- related correspondence (0.3).	5.90	1250.00	7,375.00
3/20/25	BA	Correspond with EB regarding term sheet (0.1); participate in portion of teleconference regarding strategy for plan and SAFE issues (0.5); correspond and confer with HM regarding exhibit list for appeal (0.3); attend portion of teleconference with EB, TB, JS, VO, CS, PB, SR, HM, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms (0.5).	1.40	1200.00	1,680.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/20/25	JS	Continued work on SAFE issues in connection with Whinstone settlement (3.8); attend call with client and counsel teams regarding same (1.1); review and evaluate further correspondence from SAFEs regarding document requests related to litigation team (1.3); review and evaluate issues affecting Debtors in connection with SAFE subpoena of Imperium (0.9); attend teleconference with EB, BA, TB, VO, CS, PB, SR, HM, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	7.90	1025.00	8,097.50
3/20/25	SR	Attend teleconference with EB, BA, TB, JS, VO, CS, PB, HM, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	.80	750.00	600.00
3/20/25	TB	Legal research regarding subordination of claims (5.1); Attend teleconference with EB, BA, JS, VO, CS, PB, SR, HM, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms. (0.8).	5.90	1200.00	7,080.00
3/20/25	CS	Attend teleconference with EB, BA, TB, JS, VO, PB, SR, HM, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	.80	850.00	680.00
3/20/25	CHH	Attend teleconference with EB, BA, TB, JS, VO, CS, PB, SR, HM, MV, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	.80	350.00	280.00
3/20/25	JHA	Attend teleconference with EB, BA, TB, JS, VO, CS, PB, SR, HM, MV, CHH and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	.80	350.00	280.00
3/20/25	PB	Attend teleconference with EB, BA, TB, JS, VO, CS, PB, SR, HM, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	.80	850.00	680.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/20/25	ASA	Attend teleconference with EB, BA, TB, JS, VO, CS, PB, SR, HM, MV, CHH and JHA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms (0.8); assist HM with preparation of notice of withdrawal as counsel (1.0).	1.80	350.00	630.00
3/20/25	HM	Create Exhibit List for Appeal document for BA (6.8); attend teleconference with EB, BA, TB, JS, VO, CS, PB, SR, MV, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms (0.8).	7.60	700.00	5,320.00
3/20/25	TT	Analyze and summarize additional Rhodium (5.0) and SEC (4.0) materials for EB in support of potential Whinstone settlement.	9.00	525.00	4,725.00
3/20/25	MV	Attend teleconference with EB, BA, TB, JS, VO, CS, PB, SR, HM, CHH, JHA, and ASA regarding case developments and assignments including upcoming appellate filing and research in support of potential settlement and proposed plan terms.	.80	425.00	340.00
3/21/25	VO	Emails and confer with team regarding preparation of correspondence to counsel for SAFE AHG regarding Whinstone settlement, and analyze issues relating to same.	2.20	1025.00	2,255.00

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April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/21/25	EB	Attend teleconference with JS regarding high priority action items including response to discovery requests from counsel for SAFEs (0.7); review proposed final motion, term sheet, and proposed order (0.3); attend teleconference with client and co-counsel to discuss same (0.8); correspond with prosecution counsel (0.1); correspond with and advise CS regarding research in support of opposition to SAFE discovery requests (0.2); continue analyzing SAFE discovery issues (0.3); correspond with TT regarding revisions to memorandum (0.1); revise correspondence to counsel for SAFEs and correspond with BA, JS, co-counsel and clients regarding further revisions to same (0.7); review privilege research and memorandum from co-counsel (0.5); revise, finalize, and send response to most recent correspondence responding to SAFE discovery demands including agreed upon confidential projections document (0.6); begin analyzing materials from prosecution counsel (1.0); review proposed press release and correspondence from co-counsel regarding same (0.1); review Stris team correspondence including regarding SAFE research updates from TB (0.2).	5.60	1250.00	7,000.00
3/21/25	BA	Correspond with CS and P. Tomasco regarding appeal designations (0.2); review correspondence from K. Yang, review draft motion for protective order, and correspond with team regarding potential responses to SAFE counsel (0.4).	.60	1200.00	720.00
3/21/25	JS	Evaluate follow-on issues related to the Whinstone settlement and its impacts on potential plan confirmation (2.7); review, evaluate, and respond to discovery issues related to SAFE requests as to Stris and Lehotsky fees (2.0); prepare discovery correspondence related to SAFE involvement in Whinstone mediation (2.8); confer with EB regarding high priority action items including response to discovery requests regarding Stris and LKC fees in the Whinstone litigation (0.7).	8.20	1025.00	8,405.00
3/21/25	TB	Legal research regarding contracts potentially bearing upon Whinstone settlement (4.4); draft quick summary regarding assessment of same (0.6).	5.00	1200.00	6,000.00

Stris & Maher LLP

Invoice # 14517

April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/21/25	CS	Review and analyze case law in preparation for responding to SAFE Committee discovery requests and begin drafting memorandum regarding the same.	5.50	850.00	4,675.00
3/21/25	TT	Analyze and summarize additional SEC materials for EB in support of Whinstone settlement issues.	1.50	525.00	787.50
3/22/25	EB	Review, analyze, and correspond with P. Tomasco, JS regarding further correspondence to counsel for SAFEs (0.2); review publicly available materials and update ERCOT expert regarding matter status (0.1); continue evaluating settlement implications with respect to SAFE and additional third party asserted claims and positions (1.0).	1.30	1250.00	1,625.00
3/22/25	JS	Further evaluate interaction of SAFEs with Whinstone settlement.	1.90	1025.00	1,947.50
3/23/25	EB	Review correspondence from SAFE counsel and correspond with JS and co-counsel regarding response to same (0.2); review drafts and correspondence from BA for upcoming non-stayed appellate filing and correspond with BA, JS, and CS regarding potential revisions to same (0.6).	.80	1250.00	1,000.00
3/23/25	BA	Correspond with P. Tomasco and with CS and team regarding appeal designations and related filings (0.3); review new proof of claim from N. Cerasuolo (0.1); review correspondence with SAFE AHGs (0.2).	.60	1200.00	720.00
3/23/25	JS	Further discovery correspondence regarding SAFE interaction with Whinstone settlement issues.	1.10	1025.00	1,127.50
3/24/25	EB	Prepare for (0.2) and attend (0.4) teleconference with prosecution counsel; continue analyzing related materials and correspond with prosecution counsel and clients regarding potential interim action items and questions (1.0); review further correspondence from mediator and SAFE counsel and correspond with JS and P. Tomasco regarding response to same (0.2); propose revisions to non-abated appellate filing and correspond with BA, JS, and CS regarding same (0.2).	2.00	1250.00	2,500.00
3/24/25	BA	Correspond with CS and EB regarding appeal designations, review and revise same, correspond with P. Tomasco regarding same, correspond with M. Moore and opposing counsel regarding filing of same and need for stipulation to abate further deadlines, and approve filing of same.	1.10	1200.00	1,320.00

Stris & Maher LLP

Invoice # 14517

April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/24/25	JS	Continued work regarding SAFE interaction with Whinstone settlement and related next steps.	4.90	1025.00	5,022.50
3/24/25	CS	Review, revise, finalize, and file appellees' designations to record for appeal to district court.	1.20	850.00	1,020.00
3/24/25	CHH	Assist JS with research and collection of documents from discovery database.	.20	350.00	70.00
3/25/25	EB	Attend portion of checkpoint teleconference with BA, JS, clients, and co-counsel regarding status and high priority action items including with respect to IP (0.2); review and respond to correspondence from JS regarding client instructions and update MS and TB regarding same (0.1).	.30	1250.00	375.00
3/25/25	JS	Continued work on interaction of SAFE with Whinstone settlement and related issues (2.3); attend weekly touchpoint call (0.4).	2.70	1025.00	2,767.50
3/25/25	CS	Continue reviewing and analyzing case law in preparation for responding to SAFE discovery concerning Whinstone settlement and continue drafting memorandum regarding the same.	3.30	850.00	2,805.00
3/25/25	JHA	Prepare draft stipulation to abate deadlines at BA request.	2.20	350.00	770.00
3/26/25	EB	Attend teleconference with W. Thompson regarding expert report and analysis inquiry from [REDACTED] (0.1); correspond with BA, JS, ASA, JHA, and W. Thompson regarding response to same (0.2); confer with [REDACTED] and [REDACTED] regarding high priority action items including upcoming renewal deadline for document vendor (0.1); correspond with Stris team members regarding timing and correspondence with vendor regarding same (0.1).	.50	1250.00	625.00
3/26/25	BA	Review expert reports and correspond with EB and JS regarding inquiry from [REDACTED] (0.5); revise proposed stipulation to abate appeal deadlines, correspond with P. Tomasco, and advise JH regarding further revisions to same (0.4).	.90	1200.00	1,080.00
3/26/25	JHA	Edit draft Stipulation to Abate Deadlines at BA request.	.10	350.00	35.00
3/27/25	EB	Correspond with Stris team and vendor regarding document hosting renewal options.	.10	1250.00	125.00

Stris & Maher LLP

Invoice # 14517

April 23, 2025

Date	Tkpr	Description	Hours	Rate	Amount
3/28/25	EB	Correspond with vendor to reiterate time-sensitive request for document hosting platform renewal options (0.1); communicate with Stris team members regarding assessment of data hosting size and anticipated needs (0.1).	.20	1250.00	250.00
3/28/25	ASA	Analyze data hosting needs and correspond with vendor regarding data usage at request of EB ahead of renewal deadline.	.40	350.00	140.00
3/31/25	PS	Review mediation appointment order (0.1); confer with team regarding same (0.1).	.20	1450.00	290.00
3/31/25	EB	Correspond with Stris team and vendor and assign MV to assess data hosting size and anticipated needs and pricing options (0.2); attend teleconference with MV and review update from MV regarding status of discussions (0.2); update [REDACTED] regarding same (0.1).	.50	1250.00	625.00
3/31/25	BA	Review mediation appointment order (0.1); correspond with PS, JS, and EB regarding plan mediation and upcoming hearings and confer with EB regarding same (0.2).	.30	1200.00	360.00
3/31/25	CHH	Correspond with vendor regarding discovery platform usage, issues, and needs in advance of potential renewal.	.30	350.00	105.00
3/31/25	JHA	Update files and attend to detailed tracking regarding recent filings and case developments.	1.00	350.00	350.00
3/31/25	MV	Correspond with vendor regarding options for potential contract renewal (0.3); obtain options from separate vendor and correspond regarding potential data transfer needs (0.2); analyze and correspond with EB regarding options (0.3); attend teleconference with MV regarding same (0.2).	1.00	425.00	425.00

TOTAL PROFESSIONAL SERVICES**\$ 493,202.50**

Stris & Maher LLP

Invoice # 14517

April 23, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	23.80	1,450.00	34,510.00
Elizabeth Brannen	EB	Partner	61.50	1,250.00	76,875.00
Bridget Asay	BA	Partner	27.60	1,200.00	33,120.00
Tillman Breckenridge	TB	Partner	47.90	1,200.00	57,480.00
Matthew Seligman	MS	Partner	23.80	1,100.00	26,180.00
Victor O'Connell	VO	Partner	18.90	1,025.00	19,372.50
John Stokes	JS	Partner	73.90	1,025.00	75,747.50
Colleen Smith	CS	Associate	44.80	850.00	38,080.00
Peter Brody	PB	Associate	4.00	850.00	3,400.00
Sarah Rahimi	SR	Associate	8.70	750.00	6,525.00
Helen Marsh	HM	Associate	21.90	700.00	15,330.00
Lisa Sherrod	LS	Lead Discovery Assoc	15.30	625.00	9,562.50
Tanya Tice	TT	Discovery Associate	132.70	525.00	69,667.50
Monica Viramontes	MV	Sr Paralegal	11.90	425.00	5,057.50
Andrew Atsalis	ASA	Fellow	26.30	350.00	9,205.00
Cynthia Huang	CHH	Fellow	7.70	350.00	2,695.00
Nicholas Capalbo	NC	Fellow	3.10	350.00	1,085.00
Jaida Hodge-Adams	JHA	Fellow	26.60	350.00	9,310.00
Total			580.40		\$ 493,202.50

Stris & Maher LLP

Invoice # 14517

April 23, 2025

EXPENSES ADVANCED

Date	Task	Description	Amount
2/11/25		BA airfare for mediation.	1,168.35
2/17/25		VO Airfare to Dallas for mediation.	560.49
2/19/25		BA transportation while in Dallas for mediation.	82.64
2/19/25		VO transportation for mediation.	161.63
2/20/25		BA transportation while in Dallas for mediation.	88.48
2/20/25		VO lodging in Dallas for mediation.á	651.89
2/20/25		VO airfare for mediation.	216.99
2/21/25		BA lodging for mediation in Dallas.	1,466.64
2/21/25		BA airport parking for mediation.	36.00
3/05/25		CS pro hac application fee.	100.00
3/05/25		PS pro hac application fee.	100.00
3/05/25		JS pro hac application fee.	100.00
3/05/25		BA pro hac application fee.	100.00
3/17/25		Setec invoice - forensic investigation.	2,776.30
4/01/25		Logikcull Discovery Solutions (April 2025).	2,646.00
TOTAL EXPENSES ADVANCED			\$ 10,255.41
TOTAL THIS INVOICE			\$ 503,457.91

Stris & Maher LLP

Invoice # 14517

April 23, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14366	1/13/25	132,202.25	111,327.25	20,875.00
14459	2/21/25	840,030.97	713,078.47	126,952.50
14486	3/28/25	754,873.12	.00	754,873.12
Previous Balance				\$ 902,700.62
Balance Due This Invoice				<u>\$ 503,457.91</u>
TOTAL BALANCE DUE				<u><u>\$ 1,406,158.53</u></u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$ 754,873.12	\$.00	\$ 126,952.50	\$ 20,875.00	\$.00	\$ 902,700.62



April 23, 2025

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

Invoice # 14532
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through March 31, 2025

RE: Retention and Fee Applications

Total Professional Services	\$ 11,102.50
Total Expenses Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 11,102.50
Previous Balance	<u>\$ 19,149.50</u>
TOTAL BALANCE DUE	<u><u>\$ 30,252.00</u></u>

Stris & Maher LLP

Invoice # 14532

April 23, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
3/05/25	EB	Begin working on February monthly fee statement.	.50	1250.00	625.00
3/06/25	VO	Attention to process for quarterly fee application (0.2); prepare certificate of no objection (0.1).	.30	1025.00	307.50
3/11/25	EB	Work on monthly fee statement (0.4); advise NC regarding same (0.1).	.50	1250.00	625.00
3/12/25	NC	Assist EB with portions of monthly fee statement.	1.20	350.00	420.00
3/27/25	EB	Continue working on portion of monthly fee statement.	1.90	1250.00	2,375.00
3/28/25	EB	Continue preparing monthly fee statement.	2.80	1250.00	3,500.00
3/31/25	EB	Continue preparing monthly fee statement.	2.60	1250.00	3,250.00

TOTAL PROFESSIONAL SERVICES**\$ 11,102.50****SUMMARY OF PROFESSIONAL SERVICES**

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	8.30	1,250.00	10,375.00
Victor O'Connell	VO	Partner	.30	1,025.00	307.50
Nicholas Capalbo	NC	Fellow	1.20	350.00	420.00
Total			9.80		\$ 11,102.50

TOTAL THIS INVOICE**\$ 11,102.50**

Stris & Maher LLP

Invoice # 14532

April 23, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14381	1/13/25	6,285.00	5,028.00	1,257.00
14472	2/21/25	8,575.00	6,860.00	1,715.00
14499	3/28/25	16,177.50	.00	16,177.50
Previous Balance				\$ 19,149.50
Balance Due This Invoice				<u>\$ 11,102.50</u>
TOTAL BALANCE DUE				<u><u>\$ 30,252.00</u></u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$ 16,177.50	\$.00	\$ 1,715.00	\$ 1,257.00	\$.00	\$ 19,149.50



May 14, 2025

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

Invoice # 14560
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through April 30, 2025

RE: Midas Green Litigation

Total Professional Services	\$ 3,037.50
Total Expenses Advanced	<u>\$ 7,530.00</u>
TOTAL THIS INVOICE	\$ 10,567.50
Previous Balance	<u>\$ 37,579.00</u>
TOTAL BALANCE DUE	<u>\$ 48,146.50</u>

Stris & Maher LLP

Invoice # 14560

May 14, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
4/10/25	EB	Communicate with [REDACTED] regarding status of district court case and objection to Midas proof of claim (0.1); analyze current draft opposition to same (0.4); correspond with P. Tomasco regarding same and related action items with respect to district court (0.1).	.60	1250.00	750.00
4/15/25	EB	Communicate with CHH and ASA regarding status and analyze information in support of responding to client inquiry (0.1); correspond with [REDACTED], B. Rice, P. Tomasco, and D. Holzman regarding same (0.1).	.20	1250.00	250.00
4/16/25	VO	Review and revise EB declaration in support of objection to Midas Green's proof of claim.	.30	1025.00	307.50
4/16/25	EB	Confirm information (0.1) and revise declaration in support of objection to Midas Green claim (0.9); correspond with VO (0.1) and R. Harrington (0.1) regarding revisions to same.	1.20	1250.00	1,500.00
4/16/25	ASA	Collect requested documentation at request of EB to assist with drafting of declaration in support of Rhodium's objection to Midas Green's proof of claim.	.30	350.00	105.00
4/22/25	EB	Instruct ASA regarding status and action items following submission of amended objection to Midas Green proof of claim.	.10	1250.00	125.00

TOTAL PROFESSIONAL SERVICES**\$ 3,037.50****SUMMARY OF PROFESSIONAL SERVICES**

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	2.10	1,250.00	2,625.00
Victor O'Connell	VO	Partner	.30	1,025.00	307.50
Andrew Atsalis	ASA	Fellow	.30	350.00	105.00
Total			2.70		\$ 3,037.50

Stris & Maher LLP

Invoice # 14560

May 14, 2025

EXPENSES ADVANCED

Date	Task	Description	Amount
1/31/25		JND Discovery Invoice for January 2025.	3,765.00
3/31/25		JND Discovery Invoice for March 2025.	3,765.00
TOTAL EXPENSES ADVANCED			\$ 7,530.00
TOTAL THIS INVOICE			\$ 10,567.50

Stris & Maher LLP

Invoice # 14560

May 14, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14380	1/13/25	8,990.00	7,192.00	1,798.00
14471	2/21/25	25,380.00	21,057.00	4,323.00
14498	3/28/25	15,240.00	12,192.00	3,048.00
14530	4/23/25	28,410.00	.00	28,410.00
Previous Balance				\$ 37,579.00
Balance Due This Invoice				<u>\$ 10,567.50</u>
TOTAL BALANCE DUE				<u>\$ 48,146.50</u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$ 28,410.00	\$ 3,048.00	\$ 4,323.00	\$.00	\$ 1,798.00	\$ 37,579.00



May 14, 2025

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

Invoice # 14547
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through April 30, 2025

RE: Whinstone Litigation

Total Professional Services	\$ 55,720.00
Total Expenses Advanced	<u>\$.00</u>

TOTAL THIS INVOICE	\$ 55,720.00
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Previous Balance	<u>\$ 798,574.91</u>
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TOTAL BALANCE DUE	<u>\$ 854,294.91</u>
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Trust Funds Remaining on Account \$ 115,369.59

Stris & Maher LLP

Invoice # 14547

May 14, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
4/01/25	EB	Correspond with MV regarding and analyze document hosting options and recommendations (0.2); correspond with Rhodium regarding same (0.1); correspond with BA and JS and review correspondence from co-counsel regarding high priority action items including motion to stay appeal deadlines (0.1); advise MV regarding correspondence with vendor and review same (0.1).	.50	1250.00	625.00
4/01/25	BA	Correspond with EB and JS regarding abatement of appeal deadlines pending settlement (0.1); revise draft proposed filing regarding same (0.4); correspond with P. Tomasco regarding further edits to same, and convey draft of same to M. Moore for review (0.1).	.60	1200.00	720.00
4/01/25	MV	Assess and negotiate vendor renewal hosting contract and cold storage options including with alternative vendor (1.3); provide options to EB for next steps (0.2).	1.50	425.00	637.50
4/04/25	EB	Review and comment on draft settlement agreement (0.7); correspond with BA, JS, and VO regarding same (0.1).	.80	1250.00	1,000.00
4/04/25	BA	Review, analyze, and propose edits on draft settlement agreement (2.6); convey same to JS and EB for further review (0.1); review comments from JS, EB, and W. Thompson (0.1); convey edits and comments on draft settlement agreement from Stris team to P. Tomasco (0.2).	3.00	1200.00	3,600.00
4/07/25	BA	Review witness and exhibits lists, and exhibits, for settlement hearing (0.5); correspond with JS regarding settlement hearing (0.2).	.70	1200.00	840.00
4/08/25	EB	Review update from BA regarding client checkpoint teleconference and correspond with BA and JS regarding resulting action items (0.1); communicate with [REDACTED] regarding upcoming license review (0.1).	.20	1250.00	250.00

Stris & Maher LLP

Invoice # 14547

May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/08/25	BA	Attend hearing on settlement approval by telephone (0.6); review order approving settlement (0.2); participate in portion of weekly client update call with ██████████ W. Thompson, and J. Cohn (0.5); correspond with JS, EB, and PS regarding status of LKC fee dispute in connection with Whinstone litigation (0.3).	1.60	1200.00	1,920.00
4/09/25	EB	Begin analyzing draft license agreement as requested by ██████████ (1.0); correspond with ██████████ and ██████████ regarding same (0.1); attend teleconference with ██████████ regarding same (0.3).	1.40	1250.00	1,750.00
4/09/25	JHA	Detailed tracking of docket updates for bankruptcy proceeding, adversary proceeding, bankruptcy appeal, and district court appeal.	1.00	350.00	350.00
4/10/25	EB	Continue analyzing and propose revisions to draft license agreement (1.9); prepare for and attend teleconference with ██████████ and ██████████ regarding same (0.9); further revise same to incorporate client feedback (0.8); correspond with ██████████ regarding additional information in support of same (0.1).	3.70	1250.00	4,625.00
4/10/25	BA	Correspond with EB, JS, and team regarding client's position on potential fee dispute.	.20	1200.00	240.00
4/10/25	JHA	Attention to detailed tracking of further docket updates for bankruptcy proceeding.	.20	350.00	70.00
4/13/25	EB	Begin reviewing and analyzing Whinstone proposed changes to license agreement.	.50	1250.00	625.00
4/13/25	BA	Review bankruptcy appeal rules and correspond with P. Tomasco, JS, and W. Thompson regarding ██████████ ██████████ regarding stay of appellate deadlines.	.20	1200.00	240.00

Stris & Maher LLP

Invoice # 14547

May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/14/25	EB	Continue analyzing Whinstone proposed changes to license agreement (0.9); correspond with co-counsel and client regarding same (0.2); attend teleconference to discuss same and proposed further changes (0.8); implement same (0.4); analyze PSA confidentiality provision and related client and co-counsel correspondence (0.2); propose revisions and correspond with co-counsel and clients regarding same (0.2); review correspondence from [REDACTED] regarding and provide feedback on and propose revisions to additional provision of PSA concerning patent claims (0.2).	2.90	1250.00	3,625.00
4/14/25	CHH	Assist EB with fact research and information from various docket items in support of drafting of portion of PSA.	.30	350.00	105.00
4/14/25	ASA	Provide information and documentation to EB as requested to support potential revisions to settlement agreement.	.40	350.00	140.00
4/15/25	EB	Prepare for and attend teleconference with JS, W. Thompson, and client contacts regarding status and high priority action items including PSA and license agreement progression and anticipated timing of Whinstone close (0.2); analyze Whinstone's proposed changes to license agreement and correspond with [REDACTED] P. Tomasco, and D. Holzman regarding same (1.5); attend teleconference with [REDACTED] P. Tomasco, and D. Holzman regarding same (0.4); revise same (0.3); review client questions and correspond with D. Holzman regarding proposed revisions to confidentiality provision of PSA (0.3); review and advise in response to inquiry from [REDACTED] regarding PSA disclosure of status of Midas Green claim (0.4).	3.10	1250.00	3,875.00
4/16/25	EB	Correspond with [REDACTED] and P. Tomasco regarding status and rescheduling of hearing on objections to updated LKC retention application.	.10	1250.00	125.00
4/16/25	JHA	Update bankruptcy docket to reflect and track recent filings and documents.	.50	350.00	175.00
4/17/25	EB	Communicate with JS regarding high priority action items including continuance (0.1); review Whinstone further changes to license agreement and correspond with clients and co-counsel regarding same (0.2).	.30	1250.00	375.00

Stris & Maher LLP

Invoice # 14547

May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/18/25	EB	Continue analyzing license agreement and confidentiality PSA provision proposed changes (0.2); attend call with client and co-counsel (1.0); prepare for (0.5) and attend (0.7) meet and confer call with co-counsel and counsel for Whinstone to discuss same; confer with D. Holtzman regarding further revisions to same (0.3); correspond with JS regarding status and high priority action items (0.1).	2.80	1250.00	3,500.00
4/18/25	JS	Review and evaluate extension request and confer with team regarding next steps on same.	.90	1025.00	922.50
4/21/25	EB	Review filings and correspondence and correspond with BA, JS, [REDACTED], and co-counsel regarding status and high priority action items including review of proposed revisions to PSA.	.50	1250.00	625.00
4/21/25	BA	Correspond with JS and EB regarding status of LKC fee matter, Stris retention, and Whinstone settlement (0.1); review draft motion for extension of time with respect to LKC fee matter and correspond with EB and JS regarding same (0.2).	.30	1200.00	360.00
4/22/25	EB	Correspond with [REDACTED], and co-counsel regarding response to Whinstone [REDACTED] request (0.2); attend teleconference with [REDACTED] regarding same and next steps (0.1); correspond with BA and JS regarding high priority action items (0.2); correspond with counsel for Whinstone regarding interim response to [REDACTED] and to inquire about timing on license agreement comments (0.1); review correspondence from prosecution counsel and respond regarding status of two additional applications (0.1); analyze Whinstone proposed further revisions to license agreement and correspond with D. Holzman regarding proposed further response to same (0.4); attend checkpoint teleconference with [REDACTED], BA, JS, and co-counsel (0.5); confer with [REDACTED] regarding proposed further changes on license agreement (0.1); revise and correspond with clients and P. Tomasco regarding same (0.2); correspond with counsel for Whinstone regarding same (0.1).	2.00	1250.00	2,500.00

Stris & Maher LLP

Invoice # 14547

May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/22/25	BA	Review discovery from LKC to Rhodium and correspond with JS and EB regarding same (0.2); review objection filed by SAFEs and review calendar/docket regarding status of emergency extension request, and correspond with JS and EB regarding same (0.2); participate in team call with client (██████████) and JS, EB, W. Thompson and J. Cohn to discuss pending matters including status of settlement documents and LKC fee dispute (0.5).	.90	1200.00	1,080.00
4/22/25	JHA	Attention to detailed tracking of further docket updates and document management for bankruptcy proceeding.	2.00	350.00	700.00
4/23/25	EB	Analyze and communicate with client contacts, co-counsel, prosecution counsel, and counsel for Whinstone regarding further revisions to license agreement and PSA confidentiality provision (1.7); instruct litigation fellows and qc confidentiality designations on patent applications (0.2); correspond with prosecution counsel, client contacts, and counsel for Whinstone regarding same (0.1); correspond with JS and BA regarding status and high priority action items including Rhodium's position on discovery and disclosure in response to new requests (0.4); review draft ██████████ declaration (0.2); confer with BA and JS regarding analysis of and potential revisions to draft ██████████ declaration (0.5).	3.10	1250.00	3,875.00
4/23/25	BA	Confer with JS and EB regarding analysis of and potential revisions to draft ██████████ declaration.	.50	1200.00	600.00
4/23/25	JS	Attend to high priority action items regarding LKC retention application (2.1); attend status conference addressing in part same (0.3).	2.40	1025.00	2,460.00
4/23/25	JHA	Attention to detailed tracking of further docket updates.	.90	350.00	315.00
4/24/25	EB	Review and analyze revised ██████████ declaration from BA (0.2); confer with BA, ██████████ regarding same (0.5); further revise same (0.3); correspond with BA and JS regarding proposed dismissal papers (0.1).	1.10	1250.00	1,375.00

Stris & Maher LLP

Invoice # 14547

May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/24/25	BA	Draft proposed declaration for ██████ in connection with LKC fee (2.2); confer with ██████, and EB regarding same (0.5); confer with JS and with JS and ██████ regarding issues related to LKC fee and Whinstone settlement (0.3); review proposed dismissal papers and accompanying orders for purposes of executing Whinstone settlement and correspond with EB and JS regarding same (0.4).	3.40	1200.00	4,080.00
4/24/25	JS	Further work on high priority action items in connection with revised LKC retention application.	3.30	1025.00	3,382.50
4/24/25	SD	Assist BA with preparation of ██████ declaration.	.40	350.00	140.00
4/25/25	EB	Attend teleconference with co-counsel and counsel for Whinstone regarding final action items in support of execution of settlement, license, and accompanying documents (0.2); review updates and correspond with PS, BA, VO, and JS regarding same and anticipated closing and dismissal timing (0.1).	.30	1250.00	375.00
4/25/25	BA	Review edits from ██████ on draft declaration and correspond with ██████ regarding same (0.2); confer with JS regarding status conference and LKC fee matter (0.2).	.40	1200.00	480.00
4/25/25	JS	Prepare for (0.3) and attend (0.2) status conference regarding LKC fee dispute.	.50	1025.00	512.50
4/29/25	EB	Review and confirm filing of dismissal papers and correspond with BA regarding upcoming teleconference with ██████.	.10	1250.00	125.00
4/29/25	BA	Correspond with JS regarding status of mediation and ██████ declaration, correspond with JS, EB, and client regarding meeting to discuss ██████ declaration, review various court orders on filings implementing settlement, and correspond with litigation team regarding Milam County filing.	.20	1200.00	240.00
4/29/25	JS	Further work on high priority action items for LKC revised retention application.	.80	1025.00	820.00

Stris & Maher LLP

Invoice # 14547

May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/30/25	EB	Review correspondence from counsel for Whinstone regarding software and transition support (0.1); communicate with PS, BA, VO, and JS regarding status and high priority action items (0.2); prepare for and attend teleconference with [REDACTED] and P. Tomasco regarding response to Whinstone inquiry and review further updates regarding same (0.3).	.60	1250.00	750.00
4/30/25	BA	Review correspondence from Whinstone's counsel and client regarding transition issues and correspond with EB regarding same.	.20	1200.00	240.00
4/30/25	JHA	Attention to detailed tracking of further docket updates and document organization for bankruptcy proceeding, adversary proceeding, and district court appeal.	1.00	350.00	350.00

TOTAL PROFESSIONAL SERVICES**\$ 55,720.00****SUMMARY OF PROFESSIONAL SERVICES**

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	24.00	1,250.00	30,000.00
Bridget Asay	BA	Partner	12.20	1,200.00	14,640.00
John Stokes	JS	Partner	7.90	1,025.00	8,097.50
Monica Viramontes	MV	Sr Paralegal	1.50	425.00	637.50
Andrew Atsalis	ASA	Fellow	.40	350.00	140.00
Cynthia Huang	CHH	Fellow	.30	350.00	105.00
Sebastian Delgado	SD	Fellow	.40	350.00	140.00
Jaida Hodge-Adams	JHA	Fellow	5.60	350.00	1,960.00
Total			52.30		\$ 55,720.00

TOTAL THIS INVOICE**\$ 55,720.00**

Stris & Maher LLP

Invoice # 14547

May 14, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14366	1/13/25	132,202.25	111,327.25	20,875.00
14459	2/21/25	840,030.97	713,078.47	126,952.50
14486	3/28/25	754,873.12	607,583.62	147,289.50
14517	4/23/25	503,457.91	.00	503,457.91
Previous Balance				\$ 798,574.91
Balance Due This Invoice				<u>\$ 55,720.00</u>
TOTAL BALANCE DUE				<u>\$ 854,294.91</u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$ 503,457.91	\$ 147,289.50	\$ 126,952.50	\$.00	\$ 20,875.00	\$ 798,574.91



May 14, 2025

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

Invoice # 14561
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through April 30, 2025

RE: Retention and Fee Applications

Total Professional Services	\$ 20,292.50
Total Expenses Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 20,292.50
Previous Balance	<u>\$ 17,310.00</u>
TOTAL BALANCE DUE	<u>\$ 37,602.50</u>

Stris & Maher LLP

Invoice # 14561

May 14, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
3/25/25	NC	Assist EB with preparation of fee statements.	1.30	350.00	455.00
4/02/25	VO	Prepare February 2025 fee application.	1.50	1025.00	1,537.50
4/10/25	VO	Work on quarterly fee application (1.0); advise CHH regarding action items and next steps in support of same (0.1).	1.10	1025.00	1,127.50
4/12/25	EB	Assess and begin working on amended retention application to clarify scope to include representing Debtors in response to objections to LKC amended retention agreement.	.50	1250.00	625.00
4/13/25	EB	Attend teleconference with ██████ regarding status and action items in support of amended retention application (0.3); update PS, VO, and JS regarding same and correspond with VO regarding related materials (0.1); continue working on same (0.5).	.90	1250.00	1,125.00
4/14/25	VO	Emails with EB regarding amended retention application.	.20	1025.00	205.00
4/14/25	EB	Continue preparing amended retention application (0.7); correspond with PS, VO, JS, ██████ and ██████ regarding same (0.1).	.80	1250.00	1,000.00
4/15/25	VO	Review and revise application to update retention order (0.8); emails with team regarding same (0.2).	1.00	1025.00	1,025.00
4/15/25	EB	Revise proposed order in support of amended and clarified retention application to incorporate feedback from ██████ (0.1); update VO regarding status and continue preparing amended application (0.7); correspond with ██████ regarding same (0.1); further revise and prepare updated retention application and proposed order and correspond with clients and PS, VO, and JS regarding same (1.2).	2.10	1250.00	2,625.00
4/15/25	CHH	Assist VO in preparing second interim fee application.	4.20	350.00	1,470.00
4/16/25	VO	Further prepare quarterly fee application (0.8); correspond with CHH regarding same (0.1).	.90	1025.00	922.50
4/16/25	EB	Advise NC regarding preparation of portions of monthly fee statement.	.10	1250.00	125.00
4/17/25	VO	Correspond with EB regarding clarified retention application and supporting materials.	.30	1025.00	307.50

Stris & Maher LLP

Invoice # 14561

May 14, 2025

Date	Tkpr	Description	Hours	Rate	Amount
4/17/25	EB	Correspond with NC and review portions of monthly fee statement (0.1); communicate with [REDACTED], P. Tomasco, B. Howell, and Stris Team regarding final revisions to and filing of updated Stris retention application and supporting materials (0.7).	.80	1250.00	1,000.00
4/17/25	CHH	Assist VO with finalizing second interim fee application and proposed order to same.	.20	350.00	70.00
4/22/25	EB	Continue preparing portions of monthly fee application.	1.70	1250.00	2,125.00
4/23/25	EB	Continue preparing portions of monthly fee application.	2.90	1250.00	3,625.00
4/28/25	VO	Prepare March monthly fee application (0.8); emails with B. Howell and client regarding filing of same (0.1).	.90	1025.00	922.50

TOTAL PROFESSIONAL SERVICES**\$ 20,292.50****SUMMARY OF PROFESSIONAL SERVICES**

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	9.80	1,250.00	12,250.00
Victor O'Connell	VO	Partner	5.90	1,025.00	6,047.50
Cynthia Huang	CHH	Fellow	4.40	350.00	1,540.00
Nicholas Capalbo	NC	Fellow	1.30	350.00	455.00
Total			21.40		\$ 20,292.50

TOTAL THIS INVOICE**\$ 20,292.50**

Stris & Maher LLP

Invoice # 14561

May 14, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14381	1/13/25	6,285.00	5,028.00	1,257.00
14472	2/21/25	8,575.00	6,860.00	1,715.00
14499	3/28/25	16,177.50	12,942.00	3,235.50
14532	4/23/25	11,102.50	.00	11,102.50
Previous Balance				\$ 17,310.00
Balance Due This Invoice				<u>\$ 20,292.50</u>
TOTAL BALANCE DUE				<u>\$ 37,602.50</u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$ 11,102.50	\$ 3,235.50	\$ 1,715.00	\$.00	\$ 1,257.00	\$ 17,310.00



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
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Previous Balance	<u>\$ 13,906.50</u>
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TOTAL BALANCE DUE	<u><u>\$ 23,841.50</u></u>
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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>\$ 23,841.50</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>\$ 317,307.36</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

**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)
	§	

**ORDER ALLOWING INTERIM COMPENSATION
AND REIMBURSEMENT OF EXPENSES**

(Relates to ECF No. ____)

The Court, having considered the Third Interim Application for Compensation and Reimbursement of Expenses filed by Stris & Maher LLP (the “*Applicant*”), orders:

1. The Applicant is allowed interim compensation and reimbursement of expenses in the amount of \$816,542.27 for the period set forth in the application.
2. The Debtors are authorized to disburse any unpaid amounts allowed by paragraph 1 of this Order.

Signed:

Alfredo R. Perez
United States Bankruptcy Judge

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.