

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

In re:	§	Chapter 11
	§	
RHODIUM ENCORE LLC, <i>et al.</i> , ¹	§	Case No. 24-90448 (ARP)
	§	
Debtors.	§	
	§	(Jointly Administered)
	§	

**STRIS & MAHER LLP’S NINTH MONTHLY FEE STATEMENT
FOR THE PERIOD JUNE 1, 2025, THROUGH JUNE 30, 2025**

Stris & Maher LLP (“Stris & Maher”) submits, pursuant to the Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the “Interim Compensation Order”) (ECF No. 264) entered on October 14, 2024, this monthly fee statement for the payment of interim compensation rendered and reimbursement of expenses incurred during the period June 1, 2025, through June 30, 2025 (the “Monthly Fee Statement”).

Stris & Maher seeks payment of interim compensation in the total amount of \$181,376.00 (80% of the services rendered), plus \$11,305.52 (100% of the interim expenses incurred). *See* Interim Compensation Order at ¶ 1(a). Summaries of the fees and expenses are attached as Exhibits 1, 2, and 3. Invoices reflecting detailed time entries are attached hereto as Exhibit 4.

¹ Debtors in these chapter 11 cases and the last four digits of their corporate identification numbers are as follows: Rhodium Encore LLC (3974), Jordan HPC LLC (3683), Rhodium JV LLC (5323), Rhodium 2.0 LLC (1013), Rhodium 10MW LLC (4142), Rhodium 30MW LLC (0263), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), Rhodium Encore Sub LLC (1064), Rhodium Enterprises, Inc. (6290), Rhodium Industries LLC (4771), Rhodium Ready Ventures LLC (8618), Rhodium Renewables LLC (0748), Rhodium Renewables Sub LLC (9511), Rhodium Shared Services LLC (5868), and Rhodium Technologies LLC (3973). The mailing and service address of Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.



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

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

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

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

Respectfully submitted this 17th day of July, 2025.

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

/s/ Patricia B. Tomasco

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-and-

STRIS & MAHER LLP

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Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on July 17, 2025, a true and correct copy of the foregoing Monthly Fee Statement was served through the Court's Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco

Patricia B. Tomasco

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

Matter #	Matter Description	Total Hours	Total Fees	80% of Fees
001	Midas Green Patent Litigation	72.1	\$78,860.00	\$63,088.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	141.9	\$133,992.50	\$107,194.00
007	Retention and Fee Applications	6.7	\$7,227.50	\$5,782.00
008	Non-working Travel	7.4	\$6,640.00	\$5,312.00
Total			\$226,720.00	\$181,376.00

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

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	13.90	\$17,375.00
Tillman Breckenridge	Partner	2003	1,200.00	11.40	\$13,680.00
Ken Halpern	Partner	1997	1,100.00	41.90	\$46,090.00
Andrew Atsalis	Litigation Fellow	N/A	350.00	4.90	\$1,715.00

Whinstone Dispute, Excluding the Tarrant County Litigation

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	34.20	\$42,750.00
Bridget Asay	Partner	1997	1,200.00	26.20	\$31,440.00
John Stokes	Partner	2016	1,025.00	43.40	\$44,485.00
Peter Brody	Associate	2016	850.00	.30	\$255.00
Colleen Smith	Associate	2015	850.00	.50	\$425.00
Rachel Fleischer	Staff Attorney	2021	525.00	2.40	\$1,260.00
Monica Viramontes	Senior Paralegal	N/A	425.00	15.50	\$6,587.50
Quoc Hoang	Legal Tech Specialist	N/A	350.00	3.00	\$1,050.00
Andrew Atsalis	Litigation Fellow	N/A	350.00	2.30	\$805.00
Sebastian Delgado	Litigation Fellow	N/A	350.00	11.70	\$4,095.00
Nicholas Capalbo	Litigation Fellow	N/A	350.00	2.40	\$840.00

Retention and Fee Applications

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	Managing Partner	2001	1,250.00	3.70	\$4,625.00
Victor O'Connell	Partner	2012	1,025.00	.60	\$615.00
John Stokes	Partner	2016	1,025.00	1.70	\$1,742.50
Nicholas Capalbo	Litigation Fellow	N/A	350.00	.70	\$245.00

Non-Working Travel²

Professional	Position with the Applicant	Year Admitted	Hourly Rate	Total Hours	Total Compensation
John Stokes	Partner	2016	1,025.00	6.00	\$6,150.00
Sebastian Delgado	Litigation Fellow	N/A	350.00	1.40	\$490.00
Total after 50% discount					

² Stris & Maher has billed its time for travel during which no work was performed on a separate invoice at a 50% discount.

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

Expense	Amount
E-discovery platform fees	\$3,765.00
Travel	\$1,052.36
Total	\$4,817.36

Whinstone Dispute, Excluding the Tarrant County Litigation

Expense	Amount
E-discovery platform fees	\$2,646.00
Travel	\$1,851.47
Court transcription services	\$1,990.69
Total	\$6,488.16

EXHIBIT 4



July 16, 2025

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

Invoice # 14614
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through June 30, 2025

RE: Midas Green Litigation

Total Professional Services	\$ 78,860.00
Total Expenses Advanced	<u>\$ 4,817.36</u>
TOTAL THIS INVOICE	\$ 83,677.36
Previous Balance	<u>\$ 5,180.50</u>
TOTAL BALANCE DUE	<u>\$ 88,857.86</u>

Stris & Maher LLP

Invoice # 14614

July 16, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
6/02/25	EB	Work on reply in advance of hearing on objection to Midas Green claim.	.50	1250.00	625.00
6/03/25	EB	Advise TB regarding action items in support of reply brief (0.2); review and update client and co-counsel regarding correspondence from counsel for Midas (0.1).	.30	1250.00	375.00
6/03/25	TB	Review and analyze documents in support of further filing on objection to Midas claim (0.3) confer with EB regarding same (0.2).	.50	1200.00	600.00
6/04/25	EB	Correspond with counsel for Midas Green (0.1); review and respond to correspondence from R. Harrington (0.1).	.20	1250.00	250.00
6/05/25	EB	Attend teleconference with counsel for Midas Green (0.2); update client and co-counsel regarding same (0.1); correspond with Stris team regarding status and upcoming action items (0.1).	.40	1250.00	500.00
6/09/25	EB	Continue working on [REDACTED] brief and hearing preparation (0.3); attend teleconference with KH regarding same (0.3); correspond with R. Harrington and update TB and KH regarding status and brief (0.1).	.70	1250.00	875.00
6/09/25	KJH	Teleconference with EB regarding opposition brief to proof of claim and hearing prep on that claim.	.30	1100.00	330.00
6/09/25	TB	Analyze materials to assist with reply brief and hearing preparation.	.90	1200.00	1,080.00
6/10/25	EB	Update [REDACTED] regarding status and action items in support of upcoming hearing.	.10	1250.00	125.00
6/10/25	TB	Continue analyzing materials including summary judgment transcript to assist EB with hearing preparation and further briefing.	.50	1200.00	600.00
6/10/25	ASA	Prepare materials for EB, TB, and KH in support of further briefing and preparation for hearing.	.80	350.00	280.00
6/11/25	EB	Prepare status summary as requested by [REDACTED].	.80	1250.00	1,000.00
6/14/25	TB	Continue analyzing district court materials to assist EB and KH with further briefing and EB with hearing preparation.	1.40	1200.00	1,680.00

Stris & Maher LLP

Invoice # 14614

July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/15/25	TB	Continue analyzing Midas-related bankruptcy court materials to assist EB and KH with further briefing and EB with hearing preparation.	3.60	1200.00	4,320.00
6/16/25	EB	Correspond with R. Harrington regarding status and action items in support of reply brief.	.10	1250.00	125.00
6/16/25	KJH	Review and analyze bankruptcy court filings and record on motion for summary judgment of noninfringement in preparation for reply and hearing on objection to claim in bankruptcy court.	3.20	1100.00	3,520.00
6/16/25	TB	Continue assisting with preparation for July 8 hearing.	.50	1200.00	600.00
6/17/25	EB	Continue preparing for hearing on objections to Midas claims.	1.00	1250.00	1,250.00
6/17/25	KJH	Conduct additional research on [REDACTED] of district court's oral order granting summary judgment [REDACTED] in preparation for reply and bankruptcy court hearing on objection to claim.	3.80	1100.00	4,180.00
6/18/25	KJH	Teleconference with EB regarding status, research findings, and further tasks to prepare for hearing (0.3); further research record and law and draft analysis and talking points regarding [REDACTED] of district court's bench ruling [REDACTED] in support of further briefing and hearing preparation (3.2).	3.50	1100.00	3,850.00
6/19/25	KJH	Further research [REDACTED] of oral summary judgment ruling and factual record, and revise analysis in preparation for hearing on Midas's proof of claim.	5.20	1100.00	5,720.00
6/20/25	EB	Review correspondence from KH and Texas counsel in support of preparation for hearing on objection to Midas claim (0.1); continue analyzing materials in preparation for same including research updates and analysis from KH (1.0).	1.10	1250.00	1,375.00
6/20/25	KJH	Research and revise analysis of [REDACTED] of Western District's grant of summary judgment, research [REDACTED] of claim under [REDACTED], and correspond with EB regarding same (4.8); teleconference with E. Winston (Quinn) regarding same (0.2).	5.00	1100.00	5,500.00
6/21/25	EB	Correspond with KH regarding status and action items in support of hearing preparation.	.10	1250.00	125.00

Stris & Maher LLP

Invoice # 14614

July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/23/25	EB	Analyze and correspond with KH regarding next steps in support of objection to Midas claim.	.50	1250.00	625.00
6/23/25	KJH	Research law on [REDACTED] of patent claims in bankruptcy court in preparation for review of reply brief and for July 8 hearing (2); correspond with E. Brannen regarding [REDACTED] at summary judgment hearing regarding [REDACTED] its rulings (0.1).	2.10	1100.00	2,310.00
6/24/25	EB	Attend teleconference with R. Harrington regarding status and action items in support of reply brief (0.2); analyze and correspond with KH regarding same and potential further arguments in support of objections to Midas claim (3.5).	3.70	1250.00	4,625.00
6/24/25	KJH	In preparation for editing reply and for hearing on Midas' proof of claim, research [REDACTED] of patent claim in bankruptcy court, and teleconference with EB regarding same.	2.10	1100.00	2,310.00
6/25/25	EB	Correspond with KH regarding update and further research in support of additional arguments for opposition to Midas claim (0.2); continue analyzing same (1.0); correspond with R. Harrington and KH regarding next steps in support of draft reply (0.1); work on same (1.1).	2.40	1250.00	3,000.00
6/25/25	KJH	Review draft reply brief in opposition to Midas proof of claim and initial revisions from TB and correspond with EB regarding issues to be addressed in same.	.40	1100.00	440.00
6/25/25	TB	Review reply brief and prior briefing and edit reply brief on objection to Midas Green claim.	1.80	1200.00	2,160.00
6/26/25	EB	Advise PB and MV regarding preservation and maintenance of document database (0.1); correspond with TB, KH, and R. Harrington regarding further revisions to reply brief in support of objection to Midas claim and related [REDACTED] issues (0.4).	.50	1250.00	625.00

Stris & Maher LLP

Invoice # 14614

July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/26/25	KJH	Teleconference with EB regarding revisions to reply brief in opposition to Midas proof of claim (0.2); teleconference with TB regarding reply brief tasks (0.1); teleconference with R. Harrington regarding reply brief in opposition to Midas proof of claim (0.3); correspond with EB and R. Harrington regarding US trustee's [REDACTED] (0.1); teleconference and correspond with VO regarding research into [REDACTED] for use in reply brief (0.1); teleconference and correspond with AA regarding research into [REDACTED] and [REDACTED] in patent case for use in reply brief (0.2); research [REDACTED] of claims [REDACTED] for drafting material for reply brief (1.4).	2.40	1100.00	2,640.00
6/26/25	TB	Propose further edits to revised reply brief on Midas Green objection.	2.20	1200.00	2,640.00
6/27/25	KJH	Revise draft reply in opposition to Midas's proof of claim.	3.10	1100.00	3,410.00
6/27/25	ASA	Analyze deposition transcripts, expert reports, and correspondence between counsel regarding [REDACTED] in support of KH and drafting of reply in opposition to Midas's proof of claim.	1.90	350.00	665.00
6/29/25	KJH	Revise draft reply in opposition to Midas proof of claim, research case law and factual record to support arguments in reply, and correspond with EB, TB and ASA regarding same.	6.80	1100.00	7,480.00
6/30/25	EB	Continue working on further opposition brief including analyzing revisions proposed by TB and KH and additional arguments for incorporation into same.	1.50	1250.00	1,875.00
6/30/25	KJH	Research law relating to [REDACTED] of claims purporting to cover post-bankruptcy petition conduct and [REDACTED] of claims [REDACTED].	3.70	1100.00	4,070.00
6/30/25	KJH	Teleconference with AA regarding statistics on Midas/Rhodium patent litigation and adjustments to reply in opposition to Midas proof of claim (0.2); teleconference with R. Harrington regarding revisions to reply in opposition to Midas proof of claim (0.1).	.30	1100.00	330.00

Stris & Maher LLP

Invoice # 14614

July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/30/25	ASA	Revise draft reply in opposition to Midas's proof of claim at request of KH and circulate with EB and TB (0.2); analyze deposition transcripts to calculate cumulative time already spent taking depositions as a data point in support of draft reply in opposition to Midas's proof of claim (1.6); correspond with KH regarding further edits to draft reply in opposition to Midas's proof of claim (0.2); analyze and provide attorneys with statistical figures related to past document productions (0.2).	2.20	350.00	770.00

TOTAL PROFESSIONAL SERVICES**\$ 78,860.00****SUMMARY OF PROFESSIONAL SERVICES**

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	13.90	1,250.00	17,375.00
Tillman Breckenridge	TB	Partner	11.40	1,200.00	13,680.00
Ken Halpern	KJH	Partner	41.90	1,100.00	46,090.00
Andrew Atsalis	ASA	Fellow	4.90	350.00	1,715.00
Total			72.10		\$ 78,860.00

EXPENSES ADVANCED

Date	Task	Description	Amount
5/31/25		JND Discovery Invoice for May 2025.	3,765.00
6/03/25		EB airfare for hearing in Houston.	1,052.36

TOTAL EXPENSES ADVANCED**\$ 4,817.36****TOTAL THIS INVOICE****\$ 83,677.36**

Stris & Maher LLP

Invoice # 14614

July 16, 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	9,960.00	607.50
14587	6/10/25	9,935.00	8,701.00	1,234.00
Previous Balance				\$ 5,180.50
Balance Due This Invoice				<u>\$ 83,677.36</u>
TOTAL BALANCE DUE				<u><u>\$ 88,857.86</u></u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$.00	\$ 1,234.00	\$ 3,946.50	\$.00	\$.00	\$ 5,180.50



July 16, 2025

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

Invoice # 14602
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through June 30, 2025

RE: Whinstone Litigation

Total Professional Services	\$ 133,992.50
Total Expenses Advanced	<u>\$ 6,488.16</u>
TOTAL THIS INVOICE	\$ 140,480.66
Previous Balance	<u>\$ 141,648.00</u>
TOTAL BALANCE DUE	<u>\$ 282,128.66</u>

Trust Funds Remaining on Account \$ 115,369.59

Stris & Maher LLP

Invoice # 14602

July 16, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
6/02/25	EB	Address correspondence and document requests from counsel for SAFE AHG in advance of C. Topping deposition (1.5); continue preparing for (2.7) and defend (3.0) same; begin attending to resulting action items including assessment of additional requested documents (1.2); assist with preparation for upcoming hearing on LKC amended fee application (1.0).	9.40	1250.00	11,750.00
6/02/25	BA	Review emailed document request from SAFE AHG and correspondence from JS regarding same (0.1); confer with JS and EB regarding document request, privilege issues, and response to same (1); review and redact requested document, confer with SD as needed for assistance with same, and correspond with EB and JS regarding redactions and privilege issues (0.8); confer with JS and correspond with bankruptcy counsel, CS and SD as needed to direct preparation of, review, and ensure filing of exhibit and witness hearing for LKC dispute (0.3); correspond and confer with JS regarding ongoing demands from SAFE AHG (0.2); correspond with JS, and with JS and EB, regarding hearing [REDACTED] and witness preparation, Topping deposition and further document requests, and outreach to Akin regarding hearing (0.4); review rough TR of Topping deposition to assist with hearing preparation (0.8).	3.60	1200.00	4,320.00
6/02/25	JS	Prepare for hearing on LKC retention application (6.9); attend portions of deposition of C. Topping in connection with same (1.8).	8.70	1025.00	8,917.50
6/02/25	CS	Review, finalize, and file witness and exhibit list for hearing on retention of LKC as special litigation counsel.	.30	850.00	255.00
6/02/25	SD	Analyze draft application for order authorizing Lehotsky Keller Cohn as special litigation counsel and application to employ Lehotsky Keller Cohn as special litigation counsel as instructed by BA (1.9); prepare new draft of debtors' witness and exhibit list, prepare proposed PDF, compile exhibits to be filed along with debtors' witness and exhibit list, and send to BA, CS, and JS (0.5).	2.40	350.00	840.00

Stris & Maher LLP

Invoice # 14602

July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/02/25	MV	Review and correspond with vendor regarding status of client document downloads.	.20	425.00	85.00
6/02/25	RF	Review, analyze, calendar, and inform the team of new filings.	.60	525.00	315.00
6/03/25	EB	Analyze and address requests from counsel for SAFE AHG for further documents (1.9); continue analyzing materials including transcript and exhibits and assisting with preparation for C. Topping testimony at LKC retention application hearing (3.1); meet with [REDACTED] (BA present for portion) regarding same (1.7); attend meet and confer requested by counsel for SAFE AHG (0.5).	7.20	1250.00	9,000.00
6/03/25	BA	Analyze action items to assist with hearing preparation (0.8); review multiple additional SAFE document requests and begin assessing privilege, burden, and work product issues and correspond with EB and JS regarding same (1.0); correspond with JS regarding [REDACTED] and legal analysis in preparation for hearing on LKC dispute, outline [REDACTED], and convey same to JS (1.0); confer with EB and [REDACTED] to assist in witness preparation for hearing (0.8); prepare for meet and confer with SAFE counsel (0.3); participate in meet and confer with SAFE AHG, EB, JS, and other counsel in preparation for hearing on LKC matter, and confer further with EB and JS regarding same (0.7).	4.60	1200.00	5,520.00
6/03/25	JS	Prepare for hearing on LKC retention application.	10.30	1025.00	10,557.50
6/03/25	ASA	Prepare briefing and supporting documentation at request of JS in support of his preparation for June 4 hearing regarding retention of Lehotsky Keller Cohn LLP.	2.30	350.00	805.00
6/03/25	SD	Obtain and organize C. Topping deposition materials in advance of hearing (0.3); prepare and provide BA and JS with additional materials including replies regarding Lehotsky Keller Cohn's retention application (0.3).	.60	350.00	210.00
6/03/25	MV	Continue working with vendor to secure client document exports.	.50	425.00	212.50
6/03/25	RF	Review, analyze, and inform EB, BA, JS, and CS of new filings.	.10	525.00	52.50

Stris & Maher LLP

Invoice # 14602

July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/04/25	EB	Review and correspond with BA and JS regarding new objectionable correspondence from counsel for SAFE AHG (0.4); review newly added SAFE AHG exhibits (0.2); continue assisting with hearing preparation (1.0); attend hearing on LKC updated fee application (3.0); begin attending to resulting action items including assessing material for 5-page brief (0.5).	5.10	1250.00	6,375.00
6/04/25	BA	Review correspondence from SAFE AHG changing position regarding exhibit agreements and correspond with JS and EB regarding hearing [REDACTED] (0.4); monitor hearing on LKC dispute (2.0); analyze points for post hearing memorandum and correspond with SD regarding research for same (0.2).	2.60	1200.00	3,120.00
6/04/25	JS	Prepare for and attend hearing on LKC retention application, including redoing direct examination in light of SAFE AHG's withdrawal of agreement to proceed partially by declaration.	11.30	1025.00	11,582.50
6/04/25	MV	Check status of exporting of client data to confirm progress and timing.	.10	425.00	42.50
6/04/25	RF	Review and analyze new filings (0.2); correspond with EB, BA, JS, and CS regarding same (0.2).	.40	525.00	210.00
6/05/25	EB	Work on 5-page submission in consultation with BA, JS, co-counsel, and counsel for LKC.	2.60	1250.00	3,250.00
6/05/25	BA	Confer with JS, EB, and LKC team regarding post-hearing brief and [REDACTED] for same (0.7); confer with SD as needed regarding research for same, and research and begin drafting same (2.9).	3.60	1200.00	4,320.00
6/05/25	JS	Work on potential [REDACTED] with objectors (0.9); work on post-hearing brief (1.5).	2.40	1025.00	2,460.00
6/05/25	SD	Research bankruptcy treatises concerning Rule 2014 for BA (1.7); prepare and send materials to BA (0.5); begin drafting debtors' post-hearing memorandum as directed by BA (0.4).	2.60	350.00	910.00
6/05/25	MV	Continue assessing progress of client data downloads and update EB regarding status.	.20	425.00	85.00
6/05/25	RF	Review, analyze, and correspond with EB, BA, JS, and CS regarding new filings.	.30	525.00	157.50

Stris & Maher LLP

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Date	Tkpr	Description	Hours	Rate	Amount
6/06/25	EB	Continue working on 5-page brief and supporting research (2.0); confer with BA regarding [REDACTED] and edits to same (0.2).	2.20	1250.00	2,750.00
6/06/25	BA	Continue researching and drafting post-hearing memorandum regarding LKC dispute and convey drafts to JS and EB for review (5.3); confer with EB regarding [REDACTED] and edits to draft (0.2).	5.50	1200.00	6,600.00
6/06/25	JS	Review and evaluate post-hearing brief (2.0); work on potential [REDACTED] with objectors (1.2).	3.20	1025.00	3,280.00
6/06/25	SD	Assist BA with materials in support of post-hearing briefing.	.30	350.00	105.00
6/06/25	MV	Continue working on export of client data.	.20	425.00	85.00
6/06/25	RF	Correspond with EB, BA, JS, and CS regarding status and new filings.	.20	525.00	105.00
6/07/25	EB	Continue working on 5-page post-hearing brief in consultation with BA and JS (1.0); review and communicate with BA and JS regarding [REDACTED] relating to same (0.2).	1.20	1250.00	1,500.00
6/07/25	BA	Review correspondence from AHG regarding potential [REDACTED] and request for additional information, review LKC response to same, and correspond with JS and EB regarding same.	.20	1200.00	240.00
6/07/25	JS	Work on post-hearing brief (1.3); continued work on potential [REDACTED] with objectors and evaluating information request from SAFE AHG in connection with same (1.0).	2.30	1025.00	2,357.50
6/08/25	BA	Correspond with JS regarding research questions for post-hearing memorandum and AHG request for extension.	.10	1200.00	120.00
6/09/25	EB	Continue working on 5-page post-hearing brief.	1.50	1250.00	1,875.00
6/09/25	BA	Continuing researching issues relevant to LKC fee dispute, review and edit draft memorandum, and review court order regarding deadline and audio recording.	1.60	1200.00	1,920.00
6/09/25	JS	Work on post-hearing brief.	1.90	1025.00	1,947.50
6/09/25	MV	Continue working to export client documents.	.50	425.00	212.50
6/09/25	RF	Correspond with EB, BA, JS, and CS regarding action items and pleadings.	.60	525.00	315.00

Stris & Maher LLP

Invoice # 14602

July 16, 2025

Date	Tkpr	Description	Hours	Rate	Amount
6/10/25	EB	Continue revising and communicating with BA, JS, client and co-counsel regarding final revisions to post-hearing brief including to incorporate comments from client and co-counsel.	4.90	1250.00	6,125.00
6/10/25	BA	Review revisions to joint filing from LKC's attorneys, correspond with EB and JS regarding same and further potential revisions, and confer with JS regarding same (0.8); confer with EB and [REDACTED] regarding same (0.1); confer as needed with SD to supervise cite check for joint post-hearing filing, continue researching and revising same, correspond with JS, EB, and LKC's attorneys regarding same, and finalize and final same (3.2).	4.10	1200.00	4,920.00
6/10/25	JS	Work on and assist in finalizing post-hearing brief.	3.30	1025.00	3,382.50
6/10/25	SD	Assist EB, BA, and JS with final revisions to and finalization of post-hearing memorandum.	5.00	350.00	1,750.00
6/10/25	MV	Continue working to export client data for backup.	.20	425.00	85.00
6/10/25	RF	Correspond with EB, BA, JS, and CS regarding new filings.	.20	525.00	105.00
6/11/25	BA	Review SAFE AHG's post-hearing memorandum (0.2); correspond with JS and EB regarding data storage (0.1).	.30	1200.00	360.00
6/11/25	QH	Download and transfer multiple-part zip files from Logikcull onto an external hard drive.	1.20	350.00	420.00
6/11/25	PB	Discuss status and advise MV regarding database export of client documents.	.50	850.00	425.00
6/11/25	SD	Review, organize, and track post-hearing briefing and qc docket updating of earlier filings related to LKC retention to ensure completeness and accuracy.	.80	350.00	280.00
6/11/25	MV	Meet with PB regarding next steps in support of export of client documents (0.5); continue working on same in consultation with QH and preparing for end of vendor hosting contract (3.3).	3.80	425.00	1,615.00
6/12/25	EB	Correspond with BA and JS regarding data storage issues and correspondence with client regarding same.	.10	1250.00	125.00
6/12/25	MV	Continue working to save and verify exported client files including load files to external hard drive.	1.20	425.00	510.00

Stris & Maher LLP

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Date	Tkpr	Description	Hours	Rate	Amount
6/16/25	QH	Download and transfer 00346 RHOD - Gen 001 export of 148 multiple-part zip files from Logikcull onto an external hard drive.	1.80	350.00	630.00
6/16/25	MV	Check status of data transfer.	.10	425.00	42.50
6/17/25	MV	Continue working on (1.2), update EB regarding (0.2), and draft memoranda regarding (1.5) export of client data.	2.90	425.00	1,232.50
6/18/25	MV	Correspond with vendor regarding end of document hosting and end of contract process.	.20	425.00	85.00
6/20/25	NC	Review and organize recent filings for attorney review.	2.40	350.00	840.00
6/20/25	MV	Correspond with EB regarding instructions to vendor and end of contract process.	.20	425.00	85.00
6/26/25	MV	Continue working on end of document vendor and client backup process in consultation with EB, PB, and QH.	1.20	425.00	510.00
6/27/25	MV	Review correspondence from QH regarding status and next steps in support of vendor contract termination and work on same.	.50	425.00	212.50
6/30/25	MV	Work with vendor on final steps to terminate contract and confirm exports of client data.	3.50	425.00	1,487.50
TOTAL PROFESSIONAL SERVICES					\$ 133,992.50

Stris & Maher LLP

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July 16, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	34.20	1,250.00	42,750.00
Bridget Asay	BA	Partner	26.20	1,200.00	31,440.00
John Stokes	JS	Partner	43.40	1,025.00	44,485.00
Colleen Smith	CS	Associate	.30	850.00	255.00
Peter Brody	PB	Associate	.50	850.00	425.00
Rachel Fleischer	RF	Staff Attorney	2.40	525.00	1,260.00
Monica Viramontes	MV	Sr Paralegal	15.50	425.00	6,587.50
Quoc Hoang	QH	Legal Technology Spe	3.00	350.00	1,050.00
Andrew Atsalis	ASA	Fellow	2.30	350.00	805.00
Sebastian Delgado	SD	Fellow	11.70	350.00	4,095.00
Nicholas Capalbo	NC	Fellow	2.40	350.00	840.00
Total			141.90		\$ 133,992.50

EXPENSES ADVANCED

Date	Task	Description	Amount
5/29/25		JS airfare for hearing on LKC retention.	1,176.96
5/30/25		JS lodging for hearing on LKC retention.	325.24
6/01/25		Logikcull Discovery Solutions (June 2025).	2,646.00
6/03/25		Vendor fee for transcripts for Charles Topping dated 06/02/2025.	1,990.69
6/04/25		JS transportation for hearing on LKC retention.	349.27
TOTAL EXPENSES ADVANCED			\$ 6,488.16
TOTAL THIS INVOICE			\$ 140,480.66

Stris & Maher LLP

Invoice # 14602

July 16, 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	44,576.00	11,144.00
14575	6/10/25	162,946.86	131,083.36	31,863.50
Previous Balance				\$ 141,648.00
Balance Due This Invoice				<u>\$ 140,480.66</u>
TOTAL BALANCE DUE				<u><u>\$ 282,128.66</u></u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$.00	\$ 31,863.50	\$ 109,784.50	\$.00	\$.00	\$ 141,648.00



July 16, 2025

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

Invoice # 14615
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through June 30, 2025

RE: Retention and Fee Applications

Total Professional Services	\$ 7,227.50
Total Expenses Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 7,227.50
Previous Balance	<u>\$ 9,101.00</u>
TOTAL BALANCE DUE	<u><u>\$ 16,328.50</u></u>

Stris & Maher LLP

Invoice # 14615

July 16, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
5/13/25	JS	Prepare for and attend status conference on Stris retention application.	1.70	1025.00	1,742.50
6/05/25	EB	Begin preparing portions of monthly fee statement.	.50	1250.00	625.00
6/05/25	NC	Assist EB in preparation of monthly fee statements.	.70	350.00	245.00
6/06/25	EB	Continue preparing portions of monthly fee statement.	.90	1250.00	1,125.00
6/09/25	EB	Continue preparing portions of monthly fee statement.	1.20	1250.00	1,500.00
6/10/25	EB	Continue preparing portions of monthly fee statement.	1.10	1250.00	1,375.00
6/13/25	VO	Prepare May monthly fee statement.	.60	1025.00	615.00

TOTAL PROFESSIONAL SERVICES**\$ 7,227.50****SUMMARY OF PROFESSIONAL SERVICES**

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	3.70	1,250.00	4,625.00
Victor O'Connell	VO	Partner	.60	1,025.00	615.00
John Stokes	JS	Partner	1.70	1,025.00	1,742.50
Nicholas Capalbo	NC	Fellow	.70	350.00	245.00
Total			6.70		\$ 7,227.50

TOTAL THIS INVOICE**\$ 7,227.50**

Stris & Maher LLP

Invoice # 14615

July 16, 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	16,234.00	4,058.50
14588	6/10/25	14,110.00	11,288.00	2,822.00
Previous Balance				\$ 9,101.00
Balance Due This Invoice				<u>\$ 7,227.50</u>
TOTAL BALANCE DUE				<u><u>\$ 16,328.50</u></u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$.00	\$ 2,822.00	\$ 6,279.00	\$.00	\$.00	\$ 9,101.00



July 16, 2025

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

Invoice # 14630
Client # 00346
Matter # 008

INVOICE SUMMARY

For professional services rendered through June 30, 2025

RE: Non-working Travel

Total Professional Services	\$ 6,640.00
50% discount	<u>\$ -3,320.00</u>
Net Professional Services	\$ 3,320.00
Total Expenses Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 3,320.00

Stris & Maher LLP

Invoice # 14630

July 16, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
6/03/25	JS	Non-working travel to hearing on LKC retention.	2.00	1025.00	2,050.00
6/04/25	JS	Non-working return travel from hearing on LKC retention.	4.00	1025.00	4,100.00
6/05/25	SD	Travel to and from Vermont Law School to conduct research on bankruptcy treatises concerning Rule 2014 and employment of an attorney for BA .	1.40	350.00	490.00

TOTAL PROFESSIONAL SERVICES **\$ 6,640.00**

50% discount \$ -3,320.00

NET PROFESSIONAL SERVICES **\$ 3,320.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
John Stokes	JS	Partner	6.00	1,025.00	6,150.00
Sebastian Delgado	SD	Fellow	1.40	350.00	490.00
Total			7.40		\$ 6,640.00

TOTAL THIS INVOICE **\$ 3,320.00**