

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

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

**COMPLEX CASE FEE APPLICATION COVER SHEET FOR LEHOTSKY KELLER  
COHN LLP'S FINAL APPLICATION FOR PAYMENT OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR  
THE PERIOD AUGUST 28, 2024 THROUGH JUNE 30, 2025**

<b>Name of Applicant:</b>	Lehotsky Keller Cohn LLP	
<b>Applicant's Role in Case:</b>	Special Litigation Counsel	
<b>Docket No. of Employment Order(s):</b>	October 14, 2024 (ECF No. 263); July 8, 2025 (ECF No. 1418)	
<b>Interim Application ( X )    No. 2nd Final Application ( X )</b>	Second and Final Fee Application	
	<b>Beginning Date</b>	<b>End Date</b>
<b>Time period covered by this Application for which interim compensation has not previously been awarded:</b>	December 1, 2024	June 30, 2025
<b>Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? Yes</b>		
<b>Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? Yes</b>		
<b>Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? Yes</b>		
<b>Do expense reimbursements represent actual and necessary expenses incurred? Yes</b>		

<sup>1</sup> 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 (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 Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.



<b>COMPENSATION BREAKDOWN FOR TIME PERIOD COVERED BY THIS APPLICATION</b>	
<b>Total professional fees requested in this Application:</b>	\$11,419,448.50
<b>Total professional hours covered by this Application:</b>	2,887.50
<b>Average hourly rate for professionals:</b>	\$975.00
<b>Total paraprofessional fees requested in this Application</b>	N/A
<b>Total paraprofessional hours covered by this Application:</b>	N/A
<b>Average hourly rate of paraprofessionals:</b>	N/A
<b>Total fees requested on a final basis in this Application:</b>	\$11,419,448.50
<b>Total expense reimbursements requested on a final basis in this Application:</b>	\$252,545.83
<b>Total fees and expenses requested in this Application:</b>	\$11,671,994.33
<b>Total interim fees and expenses awarded in all Prior Applications:</b>	\$1,986,727.00
Plan Status: The Debtors filed an amended chapter 11 plan on June 18, 2025 (ECF No. 1297).	
Primary Benefits: During the Application Period, LKC represented the Debtors in connection with their Motion to Assume Certain Executory Contracts with Whinstone US, Inc. (ECF No. 7) and Supplemental Motion to Assume Certain Executory Contracts with Whinstone US, Inc. (ECF No. 32), and in pursuing affirmative claims against Whinstone and Riot ( <i>See</i> ECF No. 770), including by preparing filings, participating in mediation ( <i>See</i> ECF No. 767), and appearing at hearings on the Debtors' behalf. LKC's services resulted in the successful prosecution of the Debtors' Motion to Assume Certain Executory Contracts with Whinstone US, Inc. and the settlement of litigation involving Whinstone US, Inc. and Riot Platforms, Inc. ( <i>See</i> ECF No. 921).	

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

In re:	§	Chapter 11
	§	
RHODIUM ENCORE LLC, <i>et al.</i> , <sup>2</sup>	§	Case No. 24-90448 (ARP)
	§	
Debtors.	§	(Jointly Administered)
	§	
	§	

**LEHOTSKY KELLER COHN LLP’S SECOND AND FINAL APPLICATION FOR  
PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR  
THE PERIOD AUGUST 28, 2024 THROUGH JUNE 30, 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.**

TO THE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Lehotsky Keller Cohn LLP (“**LKC**”) and files its *Second and Final Application for Payment of Compensation and Reimbursement of Expenses for the Period August 28 through June 30, 2025* (the “**Application**”), for final allowance of compensation for professional services provided in the amount of \$11,419,448.50<sup>3</sup> and reimbursement of actual and

<sup>2</sup> 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 (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 Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.

<sup>3</sup> LKC has agreed to discount its hourly fees in this matter according to the following formula on a monthly basis: 20% discount for the first \$250,000 of time at standard rates; 25% discount for the next \$250,000 of time at standard rates, and a 30% discount for all additional time. Each monthly invoice reflects this discount, as does this Application, except where undiscounted fees are noted. These discounts are provided to the Debtors in exchange for a success fee, which is set forth in the Application for Order Authorizing the Retention and Employment of Lehotsky Keller Cohn LLP as Special Litigation Counsel (ECF No. 173), the Application for an Updated Order Authorizing

necessary expenses in the amount of \$252,545.83 that LKC incurred from August 28, 2024 through June 30, 2025 (the “*Application Period*”), as special litigation counsel to Rhodium Encore LLC, et al. (the “*Debtors*”) in the above-captioned case and respectfully represents as follows:

### **JURISDICTION**

1. LKC submits this Application pursuant to sections 330 and 331 of title 11 of the United States Bankruptcy Code (the “*Bankruptcy Code*”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “*Bankruptcy Rules*”), rule 2016 of the Bankruptcy Local Rules (the “*Local Rules*”), the Procedures for Complex Cases in the Southern District of Texas (the “*Complex Case Procedures*”) and in recognition of 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. Pursuant to 28 U.S.C. § 1334, jurisdiction lies in this Court. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue properly lies in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

### **RELIEF REQUESTED**

3. LKC requests that the Court enter an order approving LKC’s final compensation for professional services rendered during the Application Period in the amount of \$11,419,448.50 and reimbursement of actual and necessary expense incurred by LKC in the amount of \$252,545.83. This request includes a request for allowance of the success fee set forth in the March 2025 Engagement Letter (*see* ECF No. 835) in the amount of \$8,913,600, which is included in the

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the Retention and Employment of Lehotsky Keller Cohn LLP as Special Litigation Counsel (ECF No. 835), and the Order Granting Debtors’ Application for an Updated Order Authorizing the Retention and Employment of Lehotsky Keller Cohn LLP as Special Litigation Counsel (ECF No. 1418).

requested fees. The unpaid balance of LKC's fees, inclusive of the success fee, and actual and necessary expenses is \$9,346,253.33

## BACKGROUND

### A. General Background

4. On August 24, 2024, the Debtors filed voluntary petitions under chapter 11 of the Bankruptcy Code (ECF No. 1). The factual background regarding the Debtors, including their business operations, their capital and debt structures, and the events leading to the filing of the Debtors' chapter 11 cases, is set forth in the Declaration of David M. Dunn in Support of the Chapter 11 Petitions and First Day Relief (ECF No. 35).

5. On August 29, 2024, the Court entered an order jointly administering the bankruptcy cases under the case number 24-90448 (ECF No. 41).

6. On August 24, 2024, the Debtors filed their motion to assume certain executory contracts (the "***Motion to Assume***") with Whinstone US, Inc. ("***Whinstone***") (ECF No. 7). Five days later, the Debtors filed a supplemental motion to assume (ECF No. 32). The Court entered interim orders on those motions. ECF Nos. 579 and 763. On February 24, 2025, the Court then entered the *Agreed Order Granting Debtors' Motion and Supplemental Motion to Assume Certain Executory Contracts with Whinstone US, Inc.* ECF No. 800.

7. On February 11, 2025, the Debtors filed an adversary complaint (ECF No. 770) against Whinstone and Riot Platforms, Inc. ("***Riot***"), seeking more than \$300 million in damages plus exemplary damages, attorneys' fees, pre- and post-judgment interest, and an injunction against Whinstone and Riot.

8. After extensive and hard-fought settlement negotiations, on March 21, 2025, the Debtors filed an emergency motion to approve a settlement (the "***Whinstone Settlement***") between

the Debtors and Whinstone, which included the sale of certain property of the Debtors' estate to Whinstone. ECF No. 880. The Whinstone Settlement also resolved Debtors' adversary complaint against Whinstone and Riot and resulted in Debtors receiving \$185 million. The Court approved the Whinstone Settlement on April 8, 2025. ECF No. 921.

## **B. Retention and Compensation**

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

10. On September 22, 2024, the Debtors filed an *Application for Order Authorizing the Retention and Employment of Lehotsky Keller Cohn LLP as Special Litigation Counsel* (the "***Retention Application***") (ECF No. 173). That filing included the Declarations of Jonathan F. Cohn and Charles Topping in support of the Application for Order Authorizing the Retention and Employment of Lehotsky Keller Cohn LLP as Special Litigation Counsel. The nature of LKC's compensation, including the discounted hourly rates and the existence of a success fee were disclosed in the Retention Application. On October 14, 2024, the Court entered an order granting the Retention Application (the "***Retention Order***") (ECF No. 263). The Retention Order states that the "Debtors shall retain and employ Lehotsky Keller Cohn LLP under a general retainer in accordance with Lehotsky Keller Cohn LLP's normal hourly rates and disbursement policies, as contemplated by the Application." *Id.* The Retention Order provided for a contingency fee. (*See* ECF 1418 at 19).

11. In response to purported issues raised by the Ad Hoc Group of SAFE Parties (the “**SAFE AHG**”) at mediation in February 2025 and after discussions between the Debtors and LKC, on March 6, 2025, the Debtors filed the *Application for Updated Order Authorizing the Retention and Employment of Lehotsky Keller Cohn LLP as Special Litigation Counsel* (ECF No. 835) (the “**Updated Retention Application**”). The Updated Retention Application included an updated engagement letter dated as of March 4, 2025 (the “**March 2025 Engagement Letter**”) specifying the terms of LKC’s discounted hourly rates and the terms of the success fee.

12. The SAFE AHG objected to the Debtors’ Updated Retention Application. On July 8, 2025, the Court entered the *Order Granting Debtors’ Application for an Updated Order Authorizing the Retention and Employment of Lehotsky Keller Cohn LLP as Special Litigation Counsel* (ECF No. 1418) (the “**Updated Retention Order**”) according to the terms of the March 2025 Engagement Letter.

13. On February 10, 2025, LKC filed *Lehotsky Keller Cohn LLP’s First Interim Application for Payment of Compensation and Reimbursement of Expenses for the Period August 28, 2024 through November 30, 2024* (ECF No. 765) (“**First Interim Fee Application**”), which the Court approved on March 7, 2025 (ECF No. 836), allowing and approving interim compensation and reimbursement of expenses to LKC in the amount of \$1,986,727.00.

14. During the chapter 11 cases, LKC filed 6 monthly fee statements (ECF Nos. 382, 425, 538, 730, 790, and 847). LKC has not filed interim fee statements for the dates from March 1, 2025 through June 30, 2025. The invoices for the period from March 1, 2025 through June 30, 2025 are also attached hereto and summarized below. The unpaid balance of discounted hourly fees and reimbursable expenses included in this Application is \$432,653.33, excluding the Success Fee (defined below).

Period	Expenses Incurred <sup>4</sup>	Hourly Fees Incurred <sup>5</sup>	Total Hourly Fees and Expenses Paid	Amount of Hourly Fees and Expenses Outstanding
08/28/24 – 09/30/24	\$1,755.91	\$382,919.75	\$384,675.66	\$0.00
10/01/24 – 10/31/24	\$8,182.91	\$847,449.00	\$855,631.91	\$0.00
11/01/24 – 11/30/24	\$37,290.43	\$709,129.00	\$746,419.43	\$0.00
12/01/24 – 12/31/24	\$0.00	\$54,820.00	\$43,856.00	\$10,964.00
01/01/25 – 01/31/25	\$0.00	\$127,140.00	\$101,712.00	\$25,428.00
02/01/25 – 02/28/25	\$599.00	\$241,058.75	\$193,446.00	\$48,211.75
03/01/25 – 03/31/25	\$6,843.03	\$36,748.00	\$0.00	\$43,591.03
04/01/25 – 04/30/25	\$62,894.07	\$40,600.00	\$0.00	\$103,494.07
05/01/25 – 05/31/25	\$72,841.55	\$36,984.00	\$0.00	\$109,825.55
06/01/25 – 06/30/25	\$62,138.93	\$29,000.00	\$0.00	\$91,138.93
<b>Total:</b>	<b>\$252,545.83</b>	<b>\$2,505,848.50</b>	<b>\$2,325,741.00</b>	<b>\$432,653.33</b>

### TERMS AND CONDITIONS OF EMPLOYMENT AND COMPENSATION

15. The terms and conditions of LKC's employment by the Debtors and compensation to be paid to LKC by the Debtors are outlined in the Updated Retention Application and Updated Retention Order. *See* ECF No. 835 and 1418. As set forth in the Updated Retention Application and Updated Retention Order, LKC's fees and expenses incurred in connection with this representation are to be paid out of the Debtors' estates. In addition, the Updated Retention Order approved LKC's retention under the terms of the March 2025 Engagement Letter. The calculation of the success fee set forth in the March 2025 Engagement Letter is as follows (the "***Success Fee***"):

<sup>4</sup> Under the March 2025 Engagement Letter, LKC is entitled to the reimbursement of legal expenses related to retention issues.

<sup>5</sup> All hourly fees described in this table include the agreed discount to hourly fees related to the Whinstone dispute set forth in the Retention Application, the Updated Retention Application, and each of LKC's monthly fee statements. The November monthly fee statement erroneously double-counted expenses in fees and expenses, which error was later corrected in the First Interim Fee Application. The corrected amounts are listed in the summary table.



(a) \$600,000 if (i) the Bankruptcy Court's order on Debtor's Motion to Assume is upheld in a non-appealable final judgment (or the appeal is dismissed), to be paid 30 days after such non-appealable final judgment (or dismissal) or (ii) you (or all or substantially all of the Rockdale assets) are acquired by Whinstone or an affiliate, to be paid 30 days after the closing of such acquisition;

(b) 5% of any recovered energy credits up to \$5 million, and 1% of any additional recovered energy credits, payable 30 days after each monthly utilization by Rhodium and subject to Bankruptcy Court approval; and

(c) 10% of any additional damages not attributable to energy credits that you recover, including, but not limited to, compensatory damages, incidental or consequential damages, punitive or exemplary damages, civil fines, costs, and attorneys' fees, payable 30 days after settlement of the Matter or a non-appealable final judgment and subject to Bankruptcy Court approval, provided, that in the case of a settlement, the amount on which the 10% success fee will be payable will be the amount that is net of any monetary concessions given to Whinstone or its affiliates;

March 2025 Engagement Letter at 2.

#### **PROFESSIONAL SERVICES PROVIDED BY LKC TO DEBTORS**

16. The following is a summary, by matter, of the significant professional services LKC rendered during the Application Period on a discounted hourly fee basis.

##### **A. Litigation**

**Fees: \$3,122,240.00 (with discount: \$2,352,697.50, *see supra* note 3)**

**Hours: 2708.20.**

17. The tasks performed in this category included but were not limited to: (i) regularly meeting with the Debtors and co-counsel related to litigation with Whinstone; (ii) conducting discovery, including preparing, revising and serving requests for production, interrogatories, and requests for admission; (iii) drafting motions and briefing on the Debtors' behalf; (iv) appearing at hearings and status conferences on the Debtors' behalf; (v) preparing for hearings, including witness preparations; (vi) preparing for multiple witness depositions; (vii) filing notice of removal of state court Whinstone lawsuit; (viii) working on expert witness retention and preparation related to the Motion to Assume; (ix) preparing and analyzing issues related to third party subpoenas; (x) addressing remand issues with state court Whinstone litigation; (xi) analyzing legal issues related

to the assumption of executory contracts; (xii) drafting and serving deficiency letters regarding document production; (xiii) analyzing and responding to Whinstone sanctions threats; (xiv) outlining legal arguments for proceedings related to the Motion to Assume; (xv) coordinating and organizing extensive and expedited document review; (xvi) attending to issues regarding protective order; (xvii) analyzing Whinstone's response to the Debtors' Motion to Assume; (xviii) drafting a protective order in the Whinstone dispute; (xix) drafting notices of deposition and preparing for same; (xx) drafting deposition outlines; (xxi) drafting and revising the Debtors' motion for summary judgment (ECF No. 271 & 272); (xxii) preparing for and attending Rockdale site visits; (xxiii) analyzing and revising motion to remand related to Whinstone; (xxiv) analyzing Whinstone's motion for summary judgment (ECF No. 207) and related legal issues; (xxv) reviewing and revising expert report in Whinstone dispute; (xxvi) reviewing Whinstone expert reports and developing responses to same; (xxvii) reviewing and revising expert rebuttal report; (xxviii) drafting and revising response to Whinstone motion for summary judgment (ECF No. 331); (xxix) preparing and revising witness and trial outlines; (xxx) preparing pretrial motions; (xxxi) preparing for and attending trial on Motion to Assume; (xxxii) analyzing and discussing damages issues; and (xxxiii) ongoing strategizing and coordinating of bankruptcy cases and related litigation.

18. In addition, tasks performed and services provided by LKC included but were not limited to: (i) strategizing regarding the damages case against Whinstone; (ii) coordinating, drafting and revising the damages complaint against Whinstone (ECF No. 770); (iii) coordinating expert retention and preparation in damages dispute; (iv) analyzing the impact of the Court's interim contract assumption orders on the Debtors' potential damages suit (ECF No. 579 & 763); (v) strategizing for and analyzing legal issues regarding the second phase of proceedings related

to the Motion to Assume; (vi) analyzing and preparing potential witnesses for the second phase of proceedings related to the Motion to Assume; (vii) analyzing and revising damages models; (viii) reviewing discovery and documents related to claims against Whinstone; (ix) preparing for and attending mediation with Whinstone and other parties; (x) ongoing legal research and analysis of potential claims against Whinstone and defenses; (xi) preparing for and communicating regarding bankruptcy appeal; (xii) drafting and revising appellate brief; (xiii) conferencing with co-counsel regarding issues with SAFE Ad Hoc Group; (xiv) analyzing issues regarding Riot Platforms, Inc. and Whinstone's motion to withdraw the reference and motion to dismiss; (xv) analyzing settlement agreement with Whinstone; (xvi) drafting, revising, and filing motion and proposed order related to Milam County bond; (xvii) reviewing and revising settlement agreement with Whinstone; and (xviii) finalizing Milam County dismissal papers.

**B. Fee Applications**

**Fees: \$195,600.00 (with discount: \$153,151.00, *see supra* note 3)**

**Hours: 179.30**

19. Tasks performed in this category included, but were not limited to: (i) drafting, reviewing, and filing the monthly fee statements on behalf of LKC; (ii) drafting and revising the First Interim Fee Application and supporting exhibits; (iii) communicating regarding the First Interim Fee Application and fee statements; (iv) drafting and filing updated declarations in support of retention; (v) drafting and revising the Updated Retention Application; (vi) analyzing and communicating about contingency fee issues and retention; (vii) conferencing with parties regarding March 2025 Engagement Letter and the Updated Retention Application; (viii) conferencing regarding in Ad Hoc Group's objection to the Updated Retention Application; (ix) reviewing and revising brief in support of Updated Retention Application; (x) attending status conference related to Updated Retention Application; (xi) researching legal issues related to the

Updated Retention Application; (xii) preparing for and attending hearing on objection to the Updated Retention Application; (xiii) drafting second interim fee application; (xiv) drafting and revising requests for production and interrogatories related to objection to the Updated Retention Application; (xv) ongoing conferences with co-counsel regarding the Updated Retention Application and related issues; (xvi) attending the deposition of Chuck Topping related to the Updated Retention Application; (xvii) preparing for and attending hearing on the Updated Retention Application; (xviii) researching and analyzing arguments in post-hearing brief related to the Updated Retention Application; and (xix) revising post-hearing brief related to the Updated Retention Application.

#### **CALCULATION OF SUCCESS FEE**

20. The Success Fee comprises three components related to: (1) the Court's order granting the Debtors' Motion to Assume; (2) the energy credits recovered; and (3) the damages not attributable to the energy credits.

21. As for the first component, there is no dispute that LKC is entitled to **\$600,000**. Whinstone has dismissed its appeal of the Court's order, triggering the \$600,000 fee under paragraph (a) of the March 2025 Engagement Letter.

22. As for the other two components, the March 2025 Engagement Letter and the Updated Retention Order require that the Debtors and LKC "determine in good faith the portion of transaction value ... allocable to energy credits and damages." The "transaction value" is the \$185 million that the Debtors received from Whinstone resolving their dispute.

23. To that end, shortly after entry of the LKC Updated Order on July 11, 2025, LKC's counsel sent email correspondence to Barnes & Thornburg setting forth LKC's proposed allocation

and contingency fee calculation and inviting further discussion. Barnes & Thornburg never responded to the July 11 email correspondence.

24. Thereafter, in late July, LKC's counsel reached out to Ms. Tomasco at Quinn Emanuel inquiring as to whether Barnes & Thornburg was the right Debtor "representative" to engage with on the allocation/contingency fee calculation, given the lack of response.

25. In late July and early August, LKC's counsel had limited discussions with Ms. Tomasco about the Whinstone settlement allocation and LKC fee calculation but, other than stating that the Debtors "disagreed" with LKC's calculation, Ms. Tomasco was unwilling to share the Debtors' proposed allocation or calculation of LKC's contingency fee or otherwise respond to LKC's July 11 proposal. Ms. Tomasco did not provide a counter-offer or explain why the Debtors disagreed with LKC's calculation—

[REDACTED].

26. Over a month since the Updated Retention Order was entered and five months since the Whinstone litigation settled, the Debtors appear unwilling to engage in good faith discussions about the Success Fee, as required by the Updated Retention Order. On August 7, 2025, LKC issued Rule 2004 requests to the Debtors seeking targeted information related to the Whinstone settlement allocation and LKC Success Fee calculation. Debtors had already shared some of this information with other parties to this bankruptcy, including the SAFE Ad Hoc Group, but refused to share the materials with LKC. LKC was simply trying to understand the Debtors' "disagreement" and their position on the allocation to inform LKC's calculation of the contingency fee and the firm's final fee application. But Debtors refused to produce any discovery responses or any documents—not even the ones it had previously shared with third parties including the SAFE Ad Hoc Group. Instead, on Barnes & Thornburg sent LKC a letter late at night, at 10:05 p.m., on

August 13, 2025 demanding withdrawal of the Rule 2004 requests by 1:30 pm the next day and threatening sanctions.

27. The next day, LKC requested a status conference, and Barnes & Thornburg, on behalf of the Special Committee, filed a motion to quash the Rule 2004 requests. The motion argued that LKC is not entitled to any success fee at all until the Debtors *and Whinstone* agree on the proper allocation of settlement value to energy credits and damages. Although the Updated Retention Application and the Updated Retention Order expressly state that the Debtors *and LKC* are supposed to negotiate the allocation in good faith (subject to this Court’s review and approval), the Special Committee contended that the Debtors and Whinstone determine the allocation and that LKC cannot receive any amount “inconsistent” with that determination. ECF No. 1530 at 6–10. Unsurprisingly, the Special Committee cites nothing for this proposition, which would allow LKC’s and the Debtors’ former adversary, Whinstone, to dictate the LKC Success Fee. Needless to say, LKC and the Debtors never contemplated that Whinstone would effectively determine LKC’s fee for prevailing against Whinstone.

28. The Special Committee’s motion also baselessly accused LKC of misconduct for seeking discovery and contended that discovery somehow violated a “stay” on matters unrelated to LKC. *See* ECF No. 1530. Debtors still have not produced any documents; thus, LKC has filed this Application and calculated the Success Fee based on the information LKC has in its possession.

29. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

30. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

31. [REDACTED]

[REDACTED]

[REDACTED]

32. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

33. [REDACTED]

[REDACTED]

[REDACTED]

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<sup>6</sup> LKC has not attached the [REDACTED] to this Application in the interest of including only the minimal amount of confidential information necessary to establish the Success Fee. Should the Court order, or the Debtors agree, the [REDACTED] should be filed under seal, LKC will do so at the appropriate time.

[REDACTED]

34. [REDACTED]

[REDACTED]

35. **Energy Credits.** [REDACTED]

[REDACTED]

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<sup>7</sup> [REDACTED]

<sup>8</sup> [REDACTED]



[REDACTED]

36. Additional Damages. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

37. Together, LKC's Success Fee is **\$8,913,600**, which is the sum of:

\$600,000 under paragraph (a)

[REDACTED]

[REDACTED]

#### COMPENSATION REQUESTED

38. In this Application, LKC seeks final approval of \$11,419,448.50 in fees,<sup>9</sup> inclusive of the Success Fee, and \$252,545.83 in expenses incurred from August 28, 2024 through June 30, 2025. Attached as **Exhibit A** is the *Certification of William T. Thompson in Support of Lehotsky Keller Cohn LLP's Second Interim and Final Application for Payment of Compensation and Reimbursement of Expenses for the Period August 28, 2024 through June 30, 2025* (the "***Thompson Certification***"). 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

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<sup>9</sup> \$8,913,600.00 (Success Fee) + \$2,505,848.50 (Discounted Hourly Fees) = \$11,419,448.50 (Total Requested Fees)

for LKC timekeepers is \$975.00 (applying the agreed upon discount, *see supra* note 3). **Exhibit F** is a table summarizing the reimbursable expenses of LKC in these chapter 11 cases.

**I. LKC is entitled to the Success Fee pursuant to section 328(a) of the Bankruptcy Code.**

39. LKC is entitled to the Success Fee, which was approved by the Court pursuant to section 328(a) of the Bankruptcy Code.

40. Section 328(a) allows counsel to avoid the uncertainty of what constitutes reasonable compensation under section 330 of the Bankruptcy Code. The Fifth Circuit has recognized the logic behind section 328(a): “able professionals were often unwilling to work for bankruptcy estates where their compensation would be subject to the uncertainties of what a judge thought the work was worth after it had been done. That uncertainty continues under the present § 330 . . . ” *In re National Gypsum Co.*, 123 F.3d 861, 862 (5th Cir. 1997). “Under Section 328, an attorney . . . may avoid that uncertainty by obtaining court approval of her representation and fee arrangement prior to performing the contemplated services.” *Daniels v. Barron (In re Barron)*, 325 F.3d 690, 693 (5th Cir. 2003). The Fifth Circuit has “repeatedly interpreted § 328(a) as meaning precisely what it says: A professional may be retained on any reasonable terms; but, once those terms have been approved pursuant to § 328(a), the court may not stray from them at the end of the engagement unless developments subsequent to the original approval that were incapable of being anticipated render the terms improvident.” *Asarco, L.L.C. v. Barclays Capital, Inc. (In re Asarco, L.L.C.)*, 702 F.3d 250, 257 (5th Cir. 2012). A court can only depart from the contingency fee arrangement approved under section 328(a) if there are intervening circumstances that were incapable of anticipation by the bankruptcy court at the time it approved the award. *See Barron*, 325 F.3d at 694. “[T]he intervening circumstances must have been incapable of anticipation, not merely unanticipated.” *Id.* at 693.

41. The Updated Retention Application sought approval of LKC’s Success Fee under section 328(a) of the Bankruptcy Code. *See* ECF Nos. 835, ¶ 2 and 835-1, ¶¶ 1–2. The Court approved the Updated Retention Application pursuant to Bankruptcy Code sections 327(e) and 328(a). *See* Updated Retention Order at 12–13, 19 (“Given the contributions by LKC to the Whinstone matter, it would be unreasonable for this Court to hold that LKC cannot receive a contingent fee”).

42. LKC is unquestionably entitled to its Success Fee, and there are no intervening circumstances in these cases that were incapable of anticipation by the Court at the time of approval that would render the award of the Success Fee improvident. As Debtors’ General Counsel stated: “LKC has represented Rhodium for two years through multiple periods of time when *the survival of Rhodium’s business was on the line*.” ECF No. 1111-1, ¶ 16. “Together with Stris & Maher LLP, *LKC obtained exceptional results* for Rhodium and doing so often meant meeting imminent, after-hours needs and taking on emergency filings and emergency hearings on short notice.” *Id.* “LKC helped save Rhodium from going out of business multiple times and paved the way for a settlement with Whinstone.” *Id.* ¶ 13.

43. “*The value of LKC’s services includes the affirmative claims against Whinstone* that LKC helped develop and pursue in both the arbitration and the bankruptcy proceeding.” In the Debtors’ view, “[a]fter the bankruptcy petitions were filed, LKC continued to deliver exceptional results for Debtors.” ECF No. 1111 at 3. In particular:

*LKC provided enormous value to the estate. ... Following a lengthy hearing, this Court ruled in Rhodium’s favor on every key issue of contract interpretation and alleged termination. ... That win is what brought Whinstone to the table and facilitated the \$185 million settlement*—the settlement fund that is central to formulating a plan resolving the bankruptcy. ... LKC’s contributions were substantial and critical to the value of the estate.

ECF No. 1111 at 10–11.

44. LKC accordingly requests approval of the Success Fee.

**II. LKC is entitled to hourly fees and reimbursement of expenses pursuant to section 330(a)(1) of the Bankruptcy Code.**

45. LKC submitted fee statements for the months of August, September, October, November, December, January, and February during the Application Period. Each monthly fee statement was served pursuant to the Interim Compensation Order. The monthly invoices, including those attached to each fee statement and invoices for March, April, May, and June 2025, are attached as **Exhibit G**.

46. Section 330 of the Bankruptcy Code authorizes the Court to award LKC reasonable compensation for its actual and necessary services rendered and reimbursement of its actual and necessary expenses incurred in rendering of services as special counsel to the Debtors for LKC's hourly compensation. *See* 11 U.S.C. § 330(a)(1).

47. This Application meets the standards of section 331, Bankruptcy Rule 2016, and applicable case law for compensation for services rendered on behalf of Debtors' estates and for expenses incurred. The Fifth Circuit articulated the requirements for allowance of compensation under section 330 of the Bankruptcy Code in *Barron & Newburger, P.C. v. Tex. Skyline, Ltd. (In re Woerner)*, 783 F.3d 266 (5th Cir. 2015). In *Woerner*, the Fifth Circuit held that compensation is allowable for services that are "reasonably likely to benefit" the estate and that a court should adjudge the reasonableness of the requested compensation "at the time at which the service was rendered." *Id.* at 273-74. All of the compensation requested in the Application meets the requirements of section 331 as delineated by the Fifth Circuit and should be approved.

48. LKC provided necessary and beneficial services to the Debtors during the Application Period. The time LKC spent on services rendered and the rates charged for such services were reasonable and necessary to fully protect the Debtors' estates consistent with LKC's

role as special litigation counsel and to maximize the dividend to creditors, in line with the *Johnson* factors adopted by the Fifth Circuit in *In re First Colonial Corp.*, 544 F.2d 1291, 1299 (5th Cir. 1977) (following *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974)), as follows:

**a. The Time and Labor Required**

49. As further illustrated by the fee breakdown in the Summary Cover Sheet, the amount of time spent by LKC professionals on this case for the Application Period is 2,887.50 hours.

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

50. The first *Johnson* factor examines the degree of novelty and difficulty of the issues encountered by LKC. This case has presented difficult and complex questions of fact and law relevant to both bankruptcy and applicable nonbankruptcy law. These issues required the knowledge and skills of LKC to address.

**c. The Skill Requisite to Perform the Legal Services Properly**

51. LKC's attorneys, with varying levels of experience and seniority, have been used effectively and efficiently to perform the tasks assigned to them and have provided valuable and effective assistance to the Debtors. LKC possesses the skill required to properly perform the legal services involved, including trial expertise and experience with high-stakes commercial litigation in this Circuit. The issues presented in this case required a high degree of skill and expertise.

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

52. Attorneys at LKC were not necessarily precluded from employment on other cases by the size and exigency of these cases, but these cases have required a substantial amount of time

and attention of several LKC attorneys in providing services to the Debtors, including on expedited timeframes.

**e. The Customary Fee for Similar Work in the Community**

53. The fees charged by LKC compare favorably with the fees charged by other counsel in similar cases in this jurisdiction. LKC sets its fees consistent with available market data for similarly situated firms given the years of experience of each attorney. LKC's blended rate of \$975.00 compares favorably with hourly rates charged by practitioners in cases of this size, complexity, and significance. The discounted hourly rates charged by LKC are consistent with the amount involved in these cases, the results obtained by LKC, and the level of skill necessary to perform the work. Accordingly, the hourly billing rates charged by LKC are reasonable.

54. With respect to LKC's Success Fee, LKC uses hybrid fee structures with a number of clients in complex commercial litigation. Such an arrangement made sense in this context because the Debtors were locked in an existential conflict with Whinstone and subject to significant liquidity constraints.

**f. Whether the Fees are Fixed or Contingent**

55. LKC's attorneys in this case are compensated on an hourly basis, plus the Success Fee depending on the outcome of the litigation. *See* ECF Nos. 173, 835, and 1418. LKC's fees have been discounted in exchange for the Success Fee. As the Court noted in the Updated Retention Order, "Given the contributions by LKC to the Whinstone matter, it would be unreasonable for this Court to hold that LKC cannot receive a contingent fee, especially when one considers that the initial application mentioned a contingency fee numerous times." Updated Retention Order at 19.

**g. Time Pressures Imposed by the Client or Circumstances**

56. 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 (ECF No. 7) in addition to developing the affirmative case for damages against Whinstone and Riot within a short timeframe. The Debtors recognized that “[f]ighting off Whinstone’s tactics often required meeting imminent, after-hours needs and taking on emergency filings and emergency hearings on short notice,” and “without those injunctions, Rhodium would likely have been forced out of business.” ECF No. 1111 at 3; ECF No. 1111-1, ¶ 16.

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

57. As a result of LKC’s services, strategy, and efficiency as special litigation counsel to the Debtors during the Application Period, the Court granted Debtors’ Motion to Assume (ECF No. 800), and the parties reached a favorable settlement (ECF No. 921) that resulted in bringing in \$185 million in value to the Debtors’ bankruptcy estates, allowing the Debtors to pay their creditors in full and returning a dividend to equity holders.

58. The Court has also recognized that the updates to the contingency fee in the March 2025 Engagement Letter reflected “the original intentions of LKC and the Debtors, especially when the Court considers LKC’s contributions to the Whinstone dispute, as well as the outcome LKC helped provide.” Updated Retention Order at 18. It is undisputed that LKC “performed valuable services to the debtor[s]’ estate that have increased the common funds available for distribution to the creditors” and that LKC’s services benefitted the Debtors’ estates in a “significant manner.” ECF No. 1261 at 3 (citations omitted). To summarize,

Rhodium fully recognizes the value of the services that LKC provided over the past two years and also recognizes that LKC provided those services at a discounted rate in reliance on the potential success fee. LKC helped save Rhodium from going out of business multiple times and paved the way for a settlement with Whinstone. The

value of LKC's services includes the affirmative claims against Whinstone that LKC helped develop and pursue in both the arbitration and the bankruptcy proceeding.

ECF No. 1111-1, ¶ 13.

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

59. The LKC 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. As the Debtors' General Counsel recognized, "LKC had stellar credentials, an incredible track record of success, very highly skilled attorneys. And so they were sophisticated counsel." Hrg. Tr. (June 4, 2025), 38:25–39:6.

**j. The Undesirability of the Cases**

60. 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 bankruptcy cases involved a significant risk that the Debtors would not recover from Whinstone, which is one of the reasons LKC and the Debtors agreed to a Success Fee in this matter. These cases presented no additional undesirable elements. However, the events in these bankruptcy cases confirm the significant risks posed to LKC in taking on this engagement, including the opposition to LKC's updated retention and the treatment of LKC's Success Fee.

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

61. As stated in the Retention Application and Updated Retention Application, ECF Nos. 173 and 835, the Debtors selected LKC as special litigation counsel based on LKC's work on Debtors' behalf in pre-petition proceedings in state court and arbitration. LKC's work on Debtors' behalf in pre-petition proceedings began in May 2023.



### **I. Awards in Similar Cases**

62. The fees herein requested are in line with fee awards approved in similar cases by counsel with similar sophistication and experience. *See In re Hornblower Holdings LLC*, Case No. 24-90155(MI), ECF No. 24 (Bankr. S.D. Tex. Sept. 11, 2024) (authorizing final compensation and reimbursement to special litigation counsel at significantly higher hourly rates); *In re National Cinemedia, LLC*, Case No. 23-90291(MI), ECF No. 590 (Bankr. S.D. Tex. Oct. 16, 2023) (authorizing final compensation and reimbursement to special litigation, tax, and corporate counsel at significantly higher hourly rates); *In re Ligado Networks LLC*, Case No. 25-10006, ECF No. 685 (Bankr. D. Del., June 20, 2025) (granting interim compensation to special litigation counsel at significantly higher hourly rates). In these bankruptcy cases, Stris & Maher LLP has received interim compensation at higher hourly rates than LKC (under LKC's hourly fee discount) in the amount of \$6,114,879.46. See ECF Nos. 1423 and 1502.

63. In conclusion, the services provided by LKC have been necessary to the administration of the Debtors' estates and beneficial at the time at which services were rendered. Further, LKC performed 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 chapter 11 in this district. LKC 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.

WHEREFORE, PREMISES CONSIDERED, Lehotsky Keller Cohn LLP requests that this Court enter an order (i) granting final approval of fees incurred during the Application Period in the amount of \$11,419,448.50 and reimbursement of actual and necessary expenses incurred by

Lehotsky Keller Cohn LLP during the Application Period in the amount of \$252,545.83, (iii) authorizing and directing the Debtors to pay \$9,346,253.33 to LKC, which represents the unpaid amount of LKC's fees and actual and necessary expenses, and (iii) granting such other and further relief as is just and proper.

Respectfully submitted this 22nd day of August 2025.

By: /s/ William T. Thompson  
LEHOTSKY KELLER COHN LLP  
William T. Thompson  
Todd Disher  
Alexis Swartz  
Lehotsky Keller Cohn LLP  
408 W. 11<sup>th</sup> Street, Fifth Floor  
Austin, TX 78701  
Email: will@lkcfirm.com  
Email: todd@lkcfirm.com  
Email: alexis@lkcfirm.com

and

Joshua W. Wolfshohl (TX Bar No. 24038592)  
Michael B. Dearman (TX Bar No. 24116270)  
**PORTER HEDGES LLP**  
1000 Main Street, 36th Floor  
Houston, Texas 77002  
Telephone: (713) 226-6000  
Facsimile: (713) 226-6248  
jwolfshohl@porterhedges.com  
mdearman@porterhedges.com

*Counsel to Lehotsky Keller Cohn LLP*

**CERTIFICATE OF SERVICE**

I certify that, on August 22, 2025, a true and correct copy of the foregoing document was served through the Court's Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas.

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl

**EXHIBIT A**

**CERTIFICATION OF WILLIAM T. THOMPSON IN SUPPORT OF LEHOTSKY  
KELLER COHN LLP'S SECOND AND FINAL APPLICATION FOR PAYMENT OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES**

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

In re:	§	Chapter 11
	§	
RHODIUM ENCORE LLC, <i>et al.</i> , <sup>10</sup>	§	Case No. 24-90448 (ARP)
	§	
Debtors.	§	
	§	
	§	(Jointly Administered)
	§	

**CERTIFICATION OF WILLIAM THOMPSON IN SUPPORT OF LEHOTSKY KELLER  
COHN LLP’S SECOND AND FINAL APPLICATION FOR PAYMENT OF  
COMPENSATION AND REIMBURSEMENT OF  
EXPENSES FOR THE PERIOD AUGUST 24, 2024 THROUGH JUNE 30, 2025**

I, William Thompson, hereby certify that:

1. I am a Partner of the firm Lehotsky Keller Cohn LLP (“LKC”). LKC maintains offices at, among other places, 408 W. 11th Street, Fifth Floor, Austin, TX 78701.
2. This certification (“*Certification*”) is made in connection with LKC’s second and final fee application, dated Augst 22, 2025 (the “*Application*”), for compensation and reimbursement of expenses for the period commencing August 24, 2024, through June 30, 2025 (the “*Application Period*”). I have reviewed the Application and hereby certify that the Application complies with the applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Bankruptcy Local Rules, and Fee Guidelines, to the best of my knowledge.
3. LKC 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 assigned

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<sup>10</sup> 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 (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 Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.

to this matter were necessary to assist with the prosecution of the Debtors' chapter 11 cases and 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.

4. In accordance with the Fee Guidelines, LKC responds to the questions identified therein as follows:

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

**Response:** In or around August 2024, LKC agreed to freeze its hourly rates at its 2024 hourly rates. LKC also gives Rhodium a discount on fees in exchange for a success fee. *See* the Retention Application, ECF No. 173, the Updated Retention Application, ECF No. 835, and the Updated Retention Order, ECF. No. 1418.

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 in this case.

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:** No.

If the fee application includes any rate increase since retention:

- a. Did your client review and approve those rate increases in advance?
- b. 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 to agree to modify rates or

terms in order to have you continue the representation consistent with ABA Formal Ethics Opinion 11-458.

**Response:** This Application does not include any rate increases.

Dated: August 22, 2025  
Austin, Texas

/s/ William T. Thompson  
William T. Thompson  
Partner  
Lehotsky Keller Cohn LLP

**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 <sup>1</sup>	BILLED In this fee application <sup>2</sup>
Partner	\$1,034.08	\$1,066.67
Counsel	\$791.03	\$800.00
Associate	\$675.81	\$680.00
Staff Attorney	\$444.85	\$400.00
All Timekeepers Aggregate	\$854.99	\$975.00

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

Case Number: 24-90448 (ARP)

Applicant's Name: Lehotsky Keller Cohn LLP

Date of Application: August 22, 2025

Interim or Final: 2nd Interim and Final

<sup>1</sup> LKC's "billed or collected" rates for the preceding year listed in this Exhibit incorporate rates from other matters in which LKC has provided hourly discounts in exchange for success fees. In 2025, LKC has increased its hourly rates. LKC's current standard rates, which it typically receives in matters for which there is no potential success fee are: \$1700 for the named partners, \$1450 for the other partners, \$1200 for counsel, \$950 for associates, and \$600 for staff attorneys.

<sup>2</sup> LKC has agreed to discount its fees in this matter according to the following formula on a monthly basis: 20% discount for the first \$250,000 of time at standard rates; 25% discount for the next \$250,000 of time at standard rates, and a 30% discount for all additional time. The hourly rates listed above reflect LKC's standard 2024 rates with a 20% discount applied.



**EXHIBIT C**  
**SUMMARY OF TIMEKEEPERS INCLUDED IN THIS FEE APPLICATION**

Professional	Position with the Applicant	Year Admitted	Hourly Billing Rate	Total Hours Billed	Total Hourly Compensation (without discount)
Jonathan Cohn	Partner	1999	\$1,400	395.80	\$554,120.00
			\$700 (travel time)	10.80	\$7,560.00
Steven Lehotsky	Partner	2002	\$1,400	0.40	\$560.00
William Thompson	Partner	2013	\$1,300	615.80	\$800,540.00
			\$650 (travel time)	5.70	\$3,705.00
Todd Disher	Partner	2013	\$1,300	205.10	\$266,630.00
Matthew Frederick	Partner	2003	\$1,300	291.50	\$378,950.00
			\$650 (travel time)	2.50	\$1,625.00
Andrew Davis	Partner	2012	\$1,300	275.50	\$358,150.00
			\$650 (travel time)	3.40	\$2,210.00
Ari Herbert	Counsel	2017	\$1000	4.10	\$4,100.00
Gabriela Gonzalez-Araiza	Counsel	2018	\$1000	32.00	\$32,000.00
Alexis Swartz	Counsel (as of 01/01/25)	2020	\$1000	161.20	\$161,200.00
Alexis Swartz	Associate	2020	\$850	427.70	\$363,545.00
Mark Rothrock	Associate	2020	\$850	213.60	\$181,560.00
Jacob Richards	Associate	2023	\$850	212.30	\$180,455.00
Meredith Criner	Associate	2022	\$850	16.80	\$14,280.00
Michele Somboon	Staff Attorney	2009	\$500	13.30	\$6,650.00
<b>Total</b>				<b>2887.50</b>	<b>\$3,317,840.00</b>

Case Name: *In re Rhodium Encore LLC, et al.*  
Case Number: 24-90448 (ARP)  
Applicant's Name: Lehotsky Keller Cohn LLP  
Date of Application: August 22, 2025  
Interim or Final: 2<sup>nd</sup> Interim and Final

**EXHIBIT D**  
**BUDGET**

A budget was not prepared in this case. Lehotsky Keller Cohn LLP worked 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: Lehotsky Keller Cohn LLP

Date of Application: August 22, 2025

Interim or Final: 2<sup>nd</sup> Interim and Final

**EXHIBIT E**  
**SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY**

<b>PROJECT CATEGORY</b>	<b>HOURS BUDGETED</b>	<b>FEE BUDGETED</b>	<b>HOURS BILLED</b>	<b>FEE SOUGHT</b>
Litigation	N/A	N/A	2708.20	\$2,352,697.50
Employment and Fee Applications	N/A	N/A	179.30	\$153,151.00
<b>Total</b>			<b>2887.50</b>	<b>\$2,505,848.50</b>

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

Case Number: 24-90448 (ARP)

Applicant's Name: Lehotsky Keller Cohn LLP

Date of Application: August 22, 2025

Interim or Final: 2nd Interim and Final

**EXHIBIT F**  
**SUMMARY OF EXPENSES**

<b>EXPENSE</b>	<b>AMOUNT</b>
Copying and Printing	\$3,483.95
Deposition Expenses	\$31,418.01
Delivery Services	\$47.55
Document Disposal	\$26.00
Hotel and Travel Expenses	\$15,882.99
Porter Hedges LLP Professional Services	\$200,100.98
Subpoena Fees	\$1,586.35
<b>TOTAL</b>	<b>\$252,545.83</b>

**EXHIBIT G**  
**INVOICES SUBMITTED WITH MONTHLY FEE STATEMENTS**  
**AND ADDITIONAL INVOICES**



**Lehotsky Keller Cohn LLP**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**INVOICE**

Invoice # 1272  
Date: 11/05/2024  
Due On: 12/04/2024

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**00366-Rhodium 30MW LLC****Whinstone Litigation**

Attorney	Type	Date	Notes	Quantity	Rate	Total
Alexis Swartz	Service	08/28/2024	QC documents reviewed by staff attorneys.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	08/28/2024	Prepare for and lead document QC call with staff attorneys.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	08/28/2024	Communicate with Stris team regarding expert retention.	0.20	\$850.00	\$170.00
Will Thompson	Service	08/28/2024	Prepare initial motions responding to petition.	0.70	\$1,300.00	\$910.00
Will Thompson	Service	08/28/2024	Prepare for bankruptcy hearing, including potential cross-examination of Rhodium witnesses.	1.10	\$1,300.00	\$1,430.00
Will Thompson	Service	08/28/2024	Review and analyze draft bankruptcy filings; provide comments to bankruptcy counsel.	2.10	\$1,300.00	\$2,730.00
Jonathan Cohn	Service	08/28/2024	Call with client and co-counsel.	0.60	\$1,400.00	\$840.00
Jonathan Cohn	Service	08/28/2024	Review sanctions responses.	0.30	\$1,400.00	\$420.00
Jonathan Cohn	Service	08/28/2024	Review retention application.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	08/28/2024	Revise and send letter responding to sanctions threat.	0.20	\$1,400.00	\$280.00
Jonathan Cohn	Service	08/28/2024	Call with LKC and Stris teams re witnesses and depositions.	0.70	\$1,400.00	\$980.00
Jonathan Cohn	Service	08/28/2024	Revise motion for partial summary judgment.	0.80	\$1,400.00	\$1,120.00
Jonathan Cohn	Service	08/28/2024	Calls with Stris team (1.4) and LKC team (.4) re MSJ and opposition to	1.70	\$1,400.00	\$2,380.00

Whinstone MSJ.						
Alexis Swartz	Service	08/29/2024	Attend prep session with restructuring officer.	1.60	\$850.00	\$1,360.00
Alexis Swartz	Service	08/29/2024	Discuss bankruptcy prep session with W. Thompson.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	08/29/2024	Review bankruptcy dockets.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	08/29/2024	Review TRCP rules related to responsive pleading filing.	0.60	\$850.00	\$510.00
Matthew Frederick	Service	08/29/2024	Communicate with LKC attorneys about proposed bankruptcy schedule.	0.20	\$1,300.00	\$260.00
Alexis Swartz	Service	08/29/2024	Communicate internally regarding proposed bankruptcy discovery deadlines.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	08/29/2024	Discuss bankruptcy and document review schedule with Stris team.	0.60	\$850.00	\$510.00
Alexis Swartz	Service	08/29/2024	Draft shell of verification for pleadings.	0.30	\$850.00	\$255.00
Will Thompson	Service	08/29/2024	Prepare initial motions responding to petition.	1.40	\$1,300.00	\$1,820.00
Will Thompson	Service	08/29/2024	Prepare co-CRO of Rhodium for first-day hearing in bankruptcy court, including potential cross-examination.	2.50	\$1,300.00	\$3,250.00
Will Thompson	Service	08/29/2024	Prepare for bankruptcy proceedings on motion to assume.	3.30	\$1,300.00	\$4,290.00
Matthew Frederick	Service	08/30/2024	Communicate with LKC and Stris attorneys about strategy for bankruptcy proceedings.	1.20	\$1,300.00	\$1,560.00
Alexis Swartz	Service	08/30/2024	Attend bankruptcy court hearing.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	08/30/2024	Discuss bankruptcy strategy and upcoming discovery tasks with internal team.	1.20	\$850.00	\$1,020.00
Alexis Swartz	Service	08/30/2024	Review arbitration pleadings.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	08/30/2024	Discuss contention interrogatory drafting with W. Thompson.	0.20	\$850.00	\$170.00
Todd Disher	Service	08/30/2024	Strategize regarding upcoming scheduling matters with LKC and Stris legal teams.	1.20	\$1,300.00	\$1,560.00
Todd Disher	Service	08/30/2024	Analyze strategic considerations	0.90	\$1,300.00	\$1,170.00



with J. Cohn and W. Thompson.						
Jonathan Cohn	Service	08/30/2024	Attend bankruptcy hearing.	2.50	\$1,400.00	\$3,500.00
Jonathan Cohn	Service	08/30/2024	Call with LKC and Stris teams re strategy and scheduling.	1.00	\$1,400.00	\$1,400.00
Jonathan Cohn	Service	08/30/2024	Call with W. Thompson and T. Disher re strategy.	0.50	\$1,400.00	\$700.00
Will Thompson	Service	08/30/2024	Prepare for bankruptcy hearing on first-day motions and status conference on motion to assume.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	08/30/2024	Attend bankruptcy hearing on first-day motions and status conference on motion to assume.	2.70	\$1,300.00	\$3,510.00
Will Thompson	Service	08/30/2024	Develop case strategy and next steps in light of bankruptcy hearing on first-day motions and status conference on motion to assume.	3.70	\$1,300.00	\$4,810.00
Will Thompson	Service	08/30/2024	Communicate with A. Swartz re interrogatories for motion-to-assume proceedings.	0.20	\$1,300.00	\$260.00
Jacob Richards	Service	08/30/2024	Attend call with Stris and LKC teams to discuss plan for bankruptcy hearing.	1.30	\$850.00	\$1,105.00
Jacob Richards	Service	08/30/2024	Review communications from team regarding next steps in bankruptcy proceeding.	0.40	\$850.00	\$340.00
Andrew Davis	Service	08/30/2024	Communicate with co-counsel and internal team re strategy and timing.	1.20	\$1,300.00	\$1,560.00
Todd Disher	Service	08/31/2024	Discuss case administration with outside counsel litigation team.	1.00	\$1,300.00	\$1,300.00
Alexis Swartz	Service	08/31/2024	Review relevant filings and pleadings and draft contention interrogatories.	1.20	\$850.00	\$1,020.00
Jonathan Cohn	Service	08/31/2024	Call w Quinn, LKC, and Stris re strategy and discovery.	1.00	\$1,400.00	\$1,400.00
Jonathan Cohn	Service	08/31/2024	Review and revise draft schedule.	0.20	\$1,400.00	\$280.00
Will Thompson	Service	08/31/2024	Communicate with potential counsel for Imperium and individual defendants.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	08/31/2024	Analyze documents in Whinstone production to prepare for motion-to-assume proceedings.	3.10	\$1,300.00	\$4,030.00

Invoice # 1272 - 00366-Rhodium 30MW LLC - 11/05/2024

Will Thompson	Service	08/31/2024	Analyze strategy for motion-to-assume discovery.	1.20	\$1,300.00	\$1,560.00
Jacob Richards	Service	08/31/2024	Review correspondence from bankruptcy counsel	0.20	\$850.00	\$170.00

Time Keeper	Quantity	Rate	Total
Jonathan Cohn	10.0	\$1,400.00	\$14,000.00
Andrew Davis	1.2	\$1,300.00	\$1,560.00
Todd Disher	3.1	\$1,300.00	\$4,030.00
Matthew Frederick	1.4	\$1,300.00	\$1,820.00
Jacob Richards	1.9	\$850.00	\$1,615.00
Alexis Swartz	7.8	\$850.00	\$6,630.00
Will Thompson	22.8	\$1,300.00	\$29,640.00
<b>Subtotal</b>			<b>\$59,295.00</b>
<b>Invoice Discount</b>			<b>20.0%</b>
<i>20% Discount off services, per agreement</i>			
<b>Total</b>			<b>\$47,436.00</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1273	12/05/2024	\$337,239.66	\$0.00	\$337,239.66
1327	12/05/2024	\$847,060.41	\$0.00	\$847,060.41

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1272	12/04/2024	\$47,436.00	\$0.00	\$47,436.00
<b>Outstanding Balance</b>				<b>\$1,231,736.07</b>
<b>Total Amount Outstanding</b>				<b>\$1,231,736.07</b>

Please make all amounts payable to: Lehotsky Keller Cohn LLP

Please pay within 29 days.

## Remittance Advice

### Checking Information

**Remit checks to:** LEHOTSKY KELLER COHN LLP  
200 Massachusetts Avenue, NW Suite 700  
Washington DC 20001

### Wire Transfer Information

**Bank Name/Address:** Receiving bank: Chain Bridge Bank, N.A., McLean, VA

**Bank ABA/Routing #:** [REDACTED]

**Name/Account #:** Lehotsky Keller Cohn Operating Account  
LEHOTSKY KELLER COHN LLP  
Account number: [REDACTED]

Please include the invoice number 1272 as an additional reference so we may accurately identify and apply your payment.

Please provide adequate payment to cover the wire fees assessed by your financial institution.

# Lehotsky Keller Cohn LLP

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**  
Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**  
200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

## INVOICE

Invoice # 1273  
Date: 11/05/2024  
Due On: 12/05/2024

Invoice Number		Total
1273		\$337,239.66
Subtotal		\$432,400.91
Tax		\$0.00
Amount Due		\$337,239.66

**Lehotsky Keller Cohn LLP****INVOICE**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

Invoice # 1273  
Date: 11/05/2024  
Due On: 12/05/2024

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**00366-Rhodium 30MW LLC****Whinstone Litigation**

Attorney	Type	Date	Notes	Quantity	Rate	Total
Will Thompson	Service	09/01/2024	Analyze issues re bankruptcy removal and Tarrant County strategy.	0.80	\$1,300.00	\$1,040.00
Will Thompson	Service	09/01/2024	Write and revise interrogatories for motion-to-assume proceedings.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	09/01/2024	Develop plan for offensive document review and analyze motion-to-assume strategy based on currently reviewed Whinstone documents.	1.00	\$1,300.00	\$1,300.00
Will Thompson	Service	09/01/2024	Analyze documents in Whinstone production to prepare for motion-to-assume proceedings.	2.40	\$1,300.00	\$3,120.00
Will Thompson	Service	09/01/2024	Analyze issues re bankruptcy removal and Tarrant County strategy.	0.80	\$1,300.00	\$1,040.00
Will Thompson	Service	09/01/2024	Analyze documents in Whinstone production to prepare for motion-to-assume proceedings.	2.40	\$1,300.00	\$3,120.00
Will Thompson	Service	09/01/2024	Develop plan for offensive document review and analyze motion-to-assume strategy based on currently reviewed Whinstone documents.	1.00	\$1,300.00	\$1,300.00
Will Thompson	Service	09/01/2024	Write and revise	0.50	\$1,300.00	\$650.00

			interrogatories for motion-to-assume proceedings.			
Alexis Swartz	Service	09/02/2024	Review and provide feedback on response to Whinstone RFPs.	0.50	\$850.00	\$425.00
Will Thompson	Service	09/02/2024	Review, revise, and file notice of notice of removal; communicate with co-counsel and client re same.	1.10	\$1,300.00	\$1,430.00
Will Thompson	Service	09/02/2024	Analyze documents in Whinstone production to prepare for motion-to-assume proceedings.	2.70	\$1,300.00	\$3,510.00
Will Thompson	Service	09/02/2024	Analyze interrogatory options for motion-to-assume proceedings.	0.40	\$1,300.00	\$520.00
Alexis Swartz	Service	09/03/2024	Communicate internally and with co counsel regarding various discovery tasks, document review, and bankruptcy related items.	0.40	\$850.00	\$340.00
Mark Rothrock	Service	09/03/2024	Strategize with A. Swartz.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	09/03/2024	Discuss case and upcoming discovery tasks with M. Somboon and M. Rothrock.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	09/03/2024	QC Documents reviewed by staff attorneys.	0.70	\$850.00	\$595.00
Alexis Swartz	Service	09/03/2024	Communicate with expert search firm regarding expert retention.	0.30	\$850.00	\$255.00
Matthew Frederick	Service	09/03/2024	Communicate with LKC attorneys about trial preparation and strategy.	1.00	\$1,300.00	\$1,300.00
Alexis Swartz	Service	09/03/2024	Attend call with Stris team regarding document recovery and third party subpoenas.	0.60	\$850.00	\$510.00
Alexis Swartz	Service	09/03/2024	Attend internal team call regarding upcoming cases tasks.	0.70	\$850.00	\$595.00
Jonathan Cohn	Service	09/03/2024	Weekly client/team call.	1.00	\$1,400.00	\$1,400.00

Jonathan Cohn	Service	09/03/2024	Strategy and organizational LKC call.	1.00	\$1,400.00	\$1,400.00
Alexis Swartz	Service	09/03/2024	Prepare for and attend document review QC discussion with staff attorneys.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	09/03/2024	Communicate with team regarding access to documents and workspace.	0.10	\$850.00	\$85.00
Alexis Swartz	Service	09/03/2024	Discuss offensive document review and case strategy with W. Thompson.	0.70	\$850.00	\$595.00
Todd Disher	Service	09/03/2024	Strategize regarding next steps with client reps and outside litigation team.	1.00	\$1,300.00	\$1,300.00
Todd Disher	Service	09/03/2024	Coordinate with LKC legal team on litigation strategy.	1.10	\$1,300.00	\$1,430.00
Alexis Swartz	Service	09/03/2024	Communicate with bankruptcy counsel regarding expert retention.	0.10	\$850.00	\$85.00
Mark Rothrock	Service	09/03/2024	Strategy calls with Rhodium Whinstone team.	1.00	\$850.00	\$850.00
Jacob Richards	Service	09/03/2024	Communicate with A. Swartz, M. Rothrock re research tasks and doc review plan	0.30	\$850.00	\$255.00
Jacob Richards	Service	09/03/2024	Meet with LKC team to discuss plan for dividing up discovery tasks	1.10	\$850.00	\$935.00
Michele Somboon	Service	09/03/2024	Meet with Ms. Swartz and Mr. Rothrock re background case information and upcoming responsibilities.	0.30	\$500.00	\$150.00
Will Thompson	Service	09/03/2024	Review and revise draft motion to transfer.	0.90	\$1,300.00	\$1,170.00
Will Thompson	Service	09/03/2024	Communicate with client and co-counsel.	1.00	\$1,300.00	\$1,300.00
Will Thompson	Service	09/03/2024	Brief LKC case team re pending discovery tasks and describe offensive-document-review process.	1.10	\$1,300.00	\$1,430.00



Will Thompson	Service	09/03/2024	Summarize case background information for document-review team and describe relevant hot documents to identify through document-review process.	1.50	\$1,300.00	\$1,950.00
Will Thompson	Service	09/03/2024	Develop offensive document review plan for motion-to-assume proceedings.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	09/03/2024	Review and revise draft rogs for motion-to-assume proceedings.	1.90	\$1,300.00	\$2,470.00
Andrew Davis	Service	09/03/2024	Communicate internally re trial preparation and strategy.	1.00	\$1,300.00	\$1,300.00
Alexis Swartz	Service	09/04/2024	Communicate internally and with co counsel regarding various discovery tasks, document review, and bankruptcy related items.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	09/04/2024	Review Whinstone productions and come up with proposal for offensive document review.	1.20	\$850.00	\$1,020.00
Alexis Swartz	Service	09/04/2024	Prepare for and attend document QC meeting.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	09/04/2024	Attend call regarding expert retention with whole team.	0.80	\$850.00	\$680.00
Mark Rothrock	Service	09/04/2024	Research privilege issue.	1.40	\$850.00	\$1,190.00
Alexis Swartz	Service	09/04/2024	Discuss expert retention with expert search firm.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	09/04/2024	Discuss defensive document review with W. Thompson.	0.50	\$850.00	\$425.00
Jonathan Cohn	Service	09/04/2024	Call w LKC and Stris team re experts.	0.70	\$1,400.00	\$980.00
Alexis Swartz	Service	09/04/2024	Communicate internally regarding offensive document review.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	09/04/2024	Review draft interrogatories.	0.20	\$850.00	\$170.00

Alexis Swartz	Service	09/04/2024	Draft third party subpoena.	2.00	\$850.00	\$1,700.00
Mark Rothrock	Service	09/04/2024	Revise interrogatories to prepare for service.	4.60	\$850.00	\$3,910.00
Alexis Swartz	Service	09/04/2024	Review produced documents.	1.10	\$850.00	\$935.00
Jacob Richards	Service	09/04/2024	Communicate internally re doc review coordination.	0.30	\$850.00	\$255.00
Jacob Richards	Service	09/04/2024	Review correspondence from bankruptcy counsel regarding proposed response to Whinstone.	0.30	\$850.00	\$255.00
Jacob Richards	Service	09/04/2024	Research issues related to third party subpoenas.	1.10	\$850.00	\$935.00
Alexis Swartz	Service	09/04/2024	Revise draft interrogatories.	0.30	\$850.00	\$255.00
Todd Disher	Service	09/04/2024	Analyze draft interrogatories.	0.80	\$1,300.00	\$1,040.00
Will Thompson	Service	09/04/2024	Analyze communication from opposing counsel re remand to state court.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	09/04/2024	Communicate with bankruptcy counsel re Whinstone's demand for remand to state court.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	09/04/2024	Analyze and revise draft rogs for motion-to-assume proceedings.	1.80	\$1,300.00	\$2,340.00
Will Thompson	Service	09/04/2024	Analyze issues re potential expert witnesses for motion-to-assume proceedings.	0.80	\$1,300.00	\$1,040.00
Will Thompson	Service	09/04/2024	Develop offensive document review plan for motion-to-assume proceedings.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	09/04/2024	Research issues re termination and default in connection with motion to assume.	1.50	\$1,300.00	\$1,950.00
Will Thompson	Service	09/04/2024	Analyze and communicate with co-counsel re Whinstone's brief re the scheduling order.	0.50	\$1,300.00	\$650.00

Alexis Swartz	Service	09/05/2024	Review produced documents.	1.70	\$850.00	\$1,445.00
Mark Rothrock	Service	09/05/2024	Revise interrogatories to Whinstone.	0.20	\$850.00	\$170.00
Mark Rothrock	Service	09/05/2024	Review case file in preparation for bankruptcy document review.	3.50	\$850.00	\$2,975.00
Alexis Swartz	Service	09/05/2024	Communicate internally and with co counsel regarding various discovery tasks, document review, and bankruptcy related items.	0.90	\$850.00	\$765.00
Alexis Swartz	Service	09/05/2024	Communicate with expert firm and team regarding expert retention agreement.	0.10	\$850.00	\$85.00
Alexis Swartz	Service	09/05/2024	Review scheduling order and communicate internally regarding.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	09/05/2024	Revise third party subpoenas.	0.90	\$850.00	\$765.00
Mark Rothrock	Service	09/05/2024	Draft third party subpoena.	2.60	\$850.00	\$2,210.00
Alexis Swartz	Service	09/05/2024	Prepare for document review training.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	09/05/2024	Train LKC team on offensive document review.	1.00	\$850.00	\$850.00
Mark Rothrock	Service	09/05/2024	Strategize regarding Whinstone litigation document review.	1.10	\$850.00	\$935.00
Matthew Frederick	Service	09/05/2024	Communicate with LKC attorneys about Whinstone documents.	0.70	\$1,300.00	\$910.00
Alexis Swartz	Service	09/05/2024	Communicate with bankruptcy counsel regarding expert retention.	0.10	\$850.00	\$85.00
Jonathan Cohn	Service	09/05/2024	Confer w W Thompson re discovery.	0.20	\$1,400.00	\$280.00
Jonathan Cohn	Service	09/05/2024	Emails w team re discovery.	0.20	\$1,400.00	\$280.00
Jacob Richards	Service	09/05/2024	Review documents from W. Thompson in	0.90	\$850.00	\$765.00

			preparation for LKC team call re document review			
Jacob Richards	Service	09/05/2024	LKC team call re review of documents produced by Whinstone	0.80	\$850.00	\$680.00
Will Thompson	Service	09/05/2024	Analyze communications from opposing counsel re removal Tarrant County lawsuit.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	09/05/2024	Plan for expert visit to Rockdale site to prepare for expert testimony.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	09/05/2024	Analyze scheduling order from bankruptcy court.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	09/05/2024	Work on retaining expert witness.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	09/05/2024	Analyze Whinstone production and refine document-review plan.	1.40	\$1,300.00	\$1,820.00
Will Thompson	Service	09/05/2024	Train document-review team for review of Whinstone production.	1.30	\$1,300.00	\$1,690.00
Will Thompson	Service	09/05/2024	Review and analyze documents from W. Jackman in Whinstone production.	3.40	\$1,300.00	\$4,420.00
Will Thompson	Service	09/05/2024	Outline briefing for motion- to-assume proceedings.	1.30	\$1,300.00	\$1,690.00
Todd Disher	Service	09/05/2024	Analyze current document production from Whinstone.	1.10	\$1,300.00	\$1,430.00
Andrew Davis	Service	09/05/2024	Communicate internally re document discovery.	0.70	\$1,300.00	\$910.00
Alexis Swartz	Service	09/06/2024	Communicate internally and with co counsel regarding various discovery tasks, document review, and bankruptcy related items.	1.40	\$850.00	\$1,190.00
Mark Rothrock	Service	09/06/2024	Revise and prepare subpoenas for service.	3.10	\$850.00	\$2,635.00
Alexis Swartz	Service	09/06/2024	Communicate internally regarding expert retention.	0.30	\$850.00	\$255.00

Alexis Swartz	Service	09/06/2024	Review and communicate regarding third party subpoenas.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	09/06/2024	Prepare for and lead call with expert.	0.50	\$850.00	\$425.00
Mark Rothrock	Expense	09/06/2024	E113 Subpoena fees: Third Party Subpoena service fee on J. Ledoux.	1.00	\$324.00	\$324.00
Mark Rothrock	Expense	09/06/2024	E113 Subpoena fees: Third Party Subpoena service fee on L. Theriot.	1.00	\$324.00	\$324.00
Mark Rothrock	Service	09/06/2024	Review Whinstone production for relevancy to bankruptcy hearing.	0.90	\$850.00	\$765.00
Jacob Richards	Service	09/06/2024	Research issues related to third party subpoenas.	0.70	\$850.00	\$595.00
Will Thompson	Service	09/06/2024	Analyze response deadline; communicate with bankruptcy counsel re need to respond in N.D. Tex. bankruptcy court.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	09/06/2024	Review and analyze documents from Whinstone production.	5.50	\$1,300.00	\$7,150.00
Will Thompson	Service	09/06/2024	Communicate with potential expert witness re site visit to support expert testimony.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	09/06/2024	Review and analyze documents from Whinstone production.	0.30	\$1,300.00	\$390.00
Matthew Frederick	Service	09/07/2024	Review Whinstone production.	2.50	\$1,300.00	\$3,250.00
Will Thompson	Service	09/07/2024	Review and analyze documents from Whinstone production.	0.30	\$1,300.00	\$390.00
Alexis Swartz	Service	09/08/2024	Communicate internally regarding third party subpoenas.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	09/08/2024	Review Whinstone documents.	1.80	\$850.00	\$1,530.00
Will Thompson	Service	09/08/2024	Review and analyze documents from Whinstone production.	1.50	\$1,300.00	\$1,950.00

Will Thompson	Service	09/08/2024	Review and analyze documents based on targeted searches of Whinstone production.	0.30	\$1,300.00	\$390.00
Mark Rothrock	Service	09/09/2024	Arrange to have third-party subpoenas served.	3.50	\$850.00	\$2,975.00
Alexis Swartz	Service	09/09/2024	Communicate internally regarding service of third party subpoenas, discovery, document review, and other case management matters.	0.80	\$850.00	\$680.00
Alexis Swartz	Service	09/09/2024	Research issues related to third party subpoena service.	0.60	\$850.00	\$510.00
Mark Rothrock	Expense	09/09/2024	E113 Subpoena fees: Third Party Subpoena service fee on C. Harris.	1.00	\$324.00	\$324.00
Mark Rothrock	Expense	09/09/2024	E113 Subpoena fees: Third Party Subpoena service fee on Riot Platforms.	1.00	\$324.00	\$324.00
Alexis Swartz	Service	09/09/2024	Research issues related to third party subpoena service.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	09/09/2024	Communicate internally regarding subpoena service of process.	0.10	\$850.00	\$85.00
Alexis Swartz	Service	09/09/2024	Communicate with expert regarding upcoming visit to Rockdale.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	09/09/2024	Discuss case and document review with G. Gonzalez Araiza	0.90	\$850.00	\$765.00
Alexis Swartz	Expense	09/09/2024	E113 Subpoena fees: Personal Service on L. Theriot.	1.00	\$290.35	\$290.35
Alexis Swartz	Service	09/09/2024	Communicate with P. Brody and internally regarding drafting deficiency letter to Whinstone.	0.50	\$850.00	\$425.00
Jonathan Cohn	Service	09/09/2024	Calls and emails re company witness.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	09/09/2024	Emails and internal calls	1.20	\$1,400.00	\$1,680.00

			re GMO litigation and strategy.			
Alexis Swartz	Service	09/09/2024	Begin draft deficiency letter.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	09/09/2024	Correspond with local counsel regarding third party subpoenas.	0.10	\$850.00	\$85.00
Steven Lehotsky	Service	09/09/2024	Emails and internal calls re GMO litigation and strategy.	0.40	\$1,400.00	\$560.00
Gabriela Gonzalez-Araiza	Service	09/09/2024	Confer with Mr. Thompson re matter background and assistance needed.	0.10	\$1,000.00	\$100.00
Gabriela Gonzalez-Araiza	Service	09/09/2024	Confer with Ms. Swartz re matter background and document review assistance needed.	0.70	\$1,000.00	\$700.00
Will Thompson	Service	09/09/2024	Review and analyze documents based on targeted searches of Whinstone production.	1.50	\$1,300.00	\$1,950.00
Will Thompson	Service	09/09/2024	Analyze and outline arguments for motion-to-assume proceedings.	4.10	\$1,300.00	\$5,330.00
Will Thompson	Service	09/09/2024	Analyze issues re bankruptcy counsel's representation of Whinstone.	1.20	\$1,300.00	\$1,560.00
Alexis Swartz	Service	09/10/2024	Research and analyze federal rule limit on interrogatory number.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	09/10/2024	Discuss case management and discovery with J. Cohn.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	09/10/2024	Communicate internally regarding service of third party subpoenas, discovery, document review, and other case management matters.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	09/10/2024	Revise draft interrogatories.	2.20	\$850.00	\$1,870.00
Alexis Swartz	Service	09/10/2024	Prepare for and attend internal team call to discuss discovery and	0.60	\$850.00	\$510.00

			case management.			
Alexis Swartz	Service	09/10/2024	Draft deficiency letter to Whinstone regarding productions 1 and 2.	0.90	\$850.00	\$765.00
Alexis Swartz	Service	09/10/2024	Communicate with P. Brody about defensive doc review.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	09/10/2024	Review Whinstone's produced documents.	1.30	\$850.00	\$1,105.00
Jacob Richards	Service	09/10/2024	Research precedent on limits on interrogatories served on aligned parties; communicate with LKC team regarding same.	3.10	\$850.00	\$2,635.00
Jacob Richards	Service	09/10/2024	Attend LKC internal strategy call.	0.50	\$850.00	\$425.00
Jacob Richards	Service	09/10/2024	Review Whinstone sanctions letter and related correspondence.	0.60	\$850.00	\$510.00
Gabriela Gonzalez-Araiza	Service	09/10/2024	Review Whinstone documents.	1.80	\$1,000.00	\$1,800.00
Jonathan Cohn	Service	09/10/2024	Communicate internally re strategy.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	09/10/2024	Revise ROGS.	0.50	\$1,400.00	\$700.00
Will Thompson	Service	09/10/2024	Analyze opposing counsel's threat to seek sanctions related to removal of case to bankruptcy court.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	09/10/2024	Revise draft interrogatories for motion-to-assume proceedings.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	09/10/2024	Communicate with LKC case team re pending discovery tasks and strategy.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	09/10/2024	Analyze and outline legal arguments for motion-to-assume proceedings.	2.40	\$1,300.00	\$3,120.00
Todd Disher	Service	09/10/2024	Discuss strategic considerations regarding discovery tasks with LKC legal team.	0.50	\$1,300.00	\$650.00



Alexis Swartz	Service	09/11/2024	Communicate internally regarding service of third party subpoenas, discovery, document review, and other case management matters.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	09/11/2024	Revise draft deficiency letter.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	09/11/2024	Communicate internally and with Stris team regarding draft Rgs.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	09/11/2024	Review Whinstone custodial files.	1.50	\$850.00	\$1,275.00
Alexis Swartz	Service	09/11/2024	Draft second set of RFPs.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	09/11/2024	Review draft RFAs.	0.30	\$850.00	\$255.00
Jonathan Cohn	Service	09/11/2024	Client call.	1.00	\$1,400.00	\$1,400.00
Jonathan Cohn	Service	09/11/2024	Revise discovery requests.	0.50	\$1,400.00	\$700.00
Alexis Swartz	Service	09/11/2024	Review draft second set of RFPs.	0.30	\$850.00	\$255.00
Jonathan Cohn	Service	09/11/2024	Confer w W Thompson re strategy.	0.40	\$1,400.00	\$560.00
Jacob Richards	Service	09/11/2024	Review third party subpoenas; discuss with A. Swartz.	0.40	\$850.00	\$340.00
Jacob Richards	Service	09/11/2024	Review correspondence from co counsel regarding discovery requests.	0.30	\$850.00	\$255.00
Will Thompson	Service	09/11/2024	Analyze opposing counsel's threat to seek sanctions related to removal of case to bankruptcy court; prepare response letter.	2.00	\$1,300.00	\$2,600.00
Will Thompson	Service	09/11/2024	Analyze strategy and review case background with A. Davis.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	09/11/2024	Communicate with client and co-counsel.	1.00	\$1,300.00	\$1,300.00
Will Thompson	Service	09/11/2024	Communicate with J. Cohn re case strategy and status.	0.40	\$1,300.00	\$520.00

Will Thompson	Service	09/11/2024	Revise outline of motion-to-assume arguments.	1.10	\$1,300.00	\$1,430.00
Mark Rothrock	Service	09/11/2024	Review Whinstone document production.	3.00	\$850.00	\$2,550.00
Andrew Davis	Service	09/11/2024	Communicate with W. Thompson re litigation background and strategy.	0.50	\$1,300.00	\$650.00
Andrew Davis	Service	09/11/2024	Review Whinstone production.	2.60	\$1,300.00	\$3,380.00
Alexis Swartz	Service	09/12/2024	Revise draft interrogatories.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	09/12/2024	Communicate internally regarding discovery, subpoenas, and other case management items.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	09/12/2024	Communicate with client regarding upcoming visit to Rockdale.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	09/12/2024	Revise and circulate RFPs set two.	0.20	\$850.00	\$170.00
Matthew Frederick	Service	09/12/2024	Review Whinstone documents.	5.80	\$1,300.00	\$7,540.00
Alexis Swartz	Service	09/12/2024	Communicate internally regarding third party subpoenas.	0.60	\$850.00	\$510.00
Alexis Swartz	Service	09/12/2024	Revise third party subpoena.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	09/12/2024	Discuss document review internally with team.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	09/12/2024	Upload to process server third party subpoena.	0.20	\$850.00	\$170.00
Jonathan Cohn	Service	09/12/2024	Revise letter responding to sanctions motion and review discovery draft.	0.50	\$1,400.00	\$700.00
Alexis Swartz	Service	09/12/2024	Serve third party subpoena.	1.70	\$850.00	\$1,445.00
Jonathan Cohn	Service	09/12/2024	Review outline for motion to assume argument.	0.50	\$1,400.00	\$700.00
Alexis Swartz	Service	09/12/2024	Communicate with client and bankruptcy counsel.	0.10	\$850.00	\$85.00
Alexis Swartz	Service	09/12/2024	Review Whinstone	0.40	\$850.00	\$340.00

			custodial files.			
Gabriela Gonzalez-Araiza	Service	09/12/2024	Review Whinstone documents.	1.50	\$1,000.00	\$1,500.00
Jacob Richards	Service	09/12/2024	Review documents from Whinstone in preparation for offensive depositions.	6.90	\$850.00	\$5,865.00
Jacob Richards	Service	09/12/2024	Communicate with A. Swartz re process server order cancellation.	0.20	\$850.00	\$170.00
Will Thompson	Service	09/12/2024	Revise response letter re sanctions threat.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	09/12/2024	Set up site visit for expert witness.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	09/12/2024	Analyze issue re service of third-party subpoena.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	09/12/2024	Communicate with M. Frederick re hot documents in Whinstone production.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	09/12/2024	Analyze issues re Quinn's representation of Whinstone.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	09/12/2024	Prepare retention application and related filings for bankruptcy court.	2.40	\$1,300.00	\$3,120.00
Mark Rothrock	Service	09/12/2024	Review Whinstone document production.	4.00	\$850.00	\$3,400.00
Mark Rothrock	Service	09/12/2024	Review Whinstone document production.	3.00	\$850.00	\$2,550.00
Andrew Davis	Service	09/12/2024	Review Whinstone production.	5.50	\$1,300.00	\$7,150.00
Alexis Swartz	Service	09/13/2024	Communicate internally regarding discovery, subpoenas, and other case management items.	0.10	\$850.00	\$85.00
Jonathan Cohn	Service	09/13/2024	Revise retention application drafts.	1.00	\$1,400.00	\$1,400.00
Matthew Frederick	Service	09/13/2024	Review documents.	3.90	\$1,300.00	\$5,070.00
Alexis Swartz	Service	09/13/2024	Review Whinstone custodial files.	0.20	\$850.00	\$170.00

Jacob Richards	Service	09/13/2024	Review documents from Whinstone in preparation for offensive depositions.	1.70	\$850.00	\$1,445.00
Jacob Richards	Service	09/13/2024	Communicate with A. Swartz re deficiencies in Whinstone production.	0.30	\$850.00	\$255.00
Will Thompson	Service	09/13/2024	Prepare retention application and related filings for bankruptcy court.	5.60	\$1,300.00	\$7,280.00
Will Thompson	Service	09/13/2024	Analyze issues re Whinstone sending third-party subpoena to Imperium.	0.30	\$1,300.00	\$390.00
Gabriela Gonzalez-Araiza	Service	09/13/2024	Review Whinstone production.	2.00	\$1,000.00	\$2,000.00
Andrew Davis	Service	09/13/2024	Review Whinstone production.	2.70	\$1,300.00	\$3,510.00
Gabriela Gonzalez-Araiza	Service	09/14/2024	Continue reviewing Whinstone documents.	2.60	\$1,000.00	\$2,600.00
Gabriela Gonzalez-Araiza	Service	09/14/2024	Review additional Whinstone custodial files.	1.00	\$1,000.00	\$1,000.00
Will Thompson	Service	09/14/2024	Analyze issues re motion for a protective order.	0.80	\$1,300.00	\$1,040.00
Alexis Swartz	Service	09/15/2024	Review hot document tagging and communicate with team regarding the same.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	09/16/2024	Communicate internally and with client.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	09/16/2024	Review outstanding to do items and communicate internally with team regarding.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	09/16/2024	Revise draft deficiency letter.	1.30	\$850.00	\$1,105.00
Matthew Frederick	Service	09/16/2024	Review documents.	4.70	\$1,300.00	\$6,110.00
Alexis Swartz	Service	09/16/2024	Communicate internally regarding document review and other discovery matters.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	09/16/2024	Review documents and organize documents for	0.90	\$850.00	\$765.00

			review.			
Alexis Swartz	Service	09/16/2024	Attend internal team call to discuss discovery and upcoming depositions.	0.50	\$850.00	\$425.00
Matthew Frederick	Service	09/16/2024	Communicate with LKC attorneys about pending projects and strategy.	0.50	\$1,300.00	\$650.00
Jonathan Cohn	Service	09/16/2024	Call w client and co-counsel.	1.20	\$1,400.00	\$1,680.00
Jonathan Cohn	Service	09/16/2024	Internal LKC weekly call.	0.50	\$1,400.00	\$700.00
Matthew Frederick	Service	09/16/2024	Review Whinstone's response to motion to assume.	0.50	\$1,300.00	\$650.00
Todd Disher	Service	09/16/2024	Analyze documents produced by Whinstone and Riot.	3.60	\$1,300.00	\$4,680.00
Gabriela Gonzalez-Araiza	Service	09/16/2024	Continue reviewing Whinstone documents.	2.40	\$1,000.00	\$2,400.00
Andrew Davis	Service	09/16/2024	Communicate internally re trial preparation and strategy.	0.50	\$1,300.00	\$650.00
Andrew Davis	Service	09/16/2024	Research case-law and examples for motion for protective order.	2.60	\$1,300.00	\$3,380.00
Will Thompson	Service	09/16/2024	Analyze and revise draft deficiency letter re Whinstone production.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	09/16/2024	Revise outline of arguments for motion-to-assume proceedings.	0.80	\$1,300.00	\$1,040.00
Will Thompson	Service	09/16/2024	Research and analyze motion for protective order.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	09/16/2024	Communicate with A. Davis re motion for protective order.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	09/16/2024	Communicate with client and co-counsel.	1.00	\$1,300.00	\$1,300.00
Will Thompson	Service	09/16/2024	Prepare retention application and related filings for bankruptcy court.	1.60	\$1,300.00	\$2,080.00

Will Thompson	Service	09/16/2024	Communicate with LKC case team about pending discovery tasks, including ongoing offensive document review, and case strategy.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	09/16/2024	Review and analyze Whinstone's response to motion to assume; analyze potential responses for Rhodium.	1.90	\$1,300.00	\$2,470.00
Jacob Richards	Service	09/16/2024	Review deficiency letter for inclusion of issues discovered during document review.	0.20	\$850.00	\$170.00
Jacob Richards	Service	09/16/2024	Review Whinstone filing.	0.40	\$850.00	\$340.00
Jacob Richards	Service	09/16/2024	LKC internal strategy call.	0.50	\$850.00	\$425.00
Mark Rothrock	Service	09/17/2024	Conduct document review.	6.60	\$850.00	\$5,610.00
Alexis Swartz	Service	09/17/2024	Review documents and discuss with W. Thompson.	0.30	\$850.00	\$255.00
Matthew Frederick	Service	09/17/2024	Review documents.	2.90	\$1,300.00	\$3,770.00
Alexis Swartz	Service	09/17/2024	Discuss document review and other upcoming discovery tasks and expert visit with W. Thompson.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	09/17/2024	Discuss standalone document review with M. Rothrock.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	09/17/2024	Discuss efficiency letter with J. Stokes.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	09/17/2024	Review Whinstone motion to assume and communicate with W. Thompson regarding the same.	0.70	\$850.00	\$595.00
Alexis Swartz	Service	09/17/2024	Communicate with expert regarding upcoming Rockdale visit.	0.30	\$850.00	\$255.00
Todd Disher	Service	09/17/2024	Analyze Whinstone's response to motion to assume.	0.80	\$1,300.00	\$1,040.00
Todd Disher	Service	09/17/2024	Discuss dispositive motion strategy with J. Cohn and	1.10	\$1,300.00	\$1,430.00

W. Thompson.						
Todd Disher	Service	09/17/2024	Continue analyzing documents produced by Whinstone.	0.70	\$1,300.00	\$910.00
Jonathan Cohn	Service	09/17/2024	Strategy call and discussion of potential MSJ with W. Thompson and T. Disher.	1.00	\$1,400.00	\$1,400.00
Alexis Swartz	Service	09/17/2024	Discuss discovery and document review with P. Brody.	0.50	\$850.00	\$425.00
Jonathan Cohn	Service	09/17/2024	Call with client and co-counsel.	0.80	\$1,400.00	\$1,120.00
Alexis Swartz	Expense	09/17/2024	E124 Other: Shoe purchase for Rockdale site visit.	1.00	\$75.76	\$75.76
Alexis Swartz	Expense	09/17/2024	E110 Out-of-town travel: Mileage for travel to Rockdale.	1.00	\$93.80	\$93.80
Andrew Davis	Service	09/17/2024	Draft motion for protective order.	1.00	\$1,300.00	\$1,300.00
Andrew Davis	Service	09/17/2024	Review background, pleadings, requests, and previous filings.	2.90	\$1,300.00	\$3,770.00
Will Thompson	Service	09/17/2024	Communicate with A. Swartz re offensive document review plan and hot documents.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	09/17/2024	Analyze potential MSJ arguments in light of Whinstone response to motion to assume.	1.10	\$1,300.00	\$1,430.00
Will Thompson	Service	09/17/2024	Analyze issues re production of Rhodium documents and protective order.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	09/17/2024	Analyze hot documents in Rhodium's production.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	09/17/2024	Analyze Fairbairns' objections to third-party subpoenas; analyze options for motion for a protective order.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	09/17/2024	Prepare motion-for-	3.90	\$1,300.00	\$5,070.00

			summary-judgment argument.			
Will Thompson	Service	09/17/2024	Communicate with client and co-counsel re pending tasks and strategy for motion-to-assume proceedings.	1.00	\$1,300.00	\$1,300.00
Will Thompson	Service	09/17/2024	Analyze issues re case timeline.	0.70	\$1,300.00	\$910.00
Mark Rothrock	Service	09/18/2024	Standalone document review and analysis.	2.90	\$850.00	\$2,465.00
Alexis Swartz	Service	09/18/2024	Communicate internally regarding alleged safety issues and document review.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	09/18/2024	Review third party subpoenas and communicate with local counsel regarding same.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	09/18/2024	Review Whinstone bankruptcy filings and communicate with W. Thompson regarding same.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	09/18/2024	Communicate with expert about Whinstone alleged safety violations.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	09/18/2024	Review documents and answer follow up questions for expert.	0.40	\$850.00	\$340.00
Matthew Frederick	Service	09/18/2024	Communicate with LKC attorneys about strategy for motion to assume.	0.20	\$1,300.00	\$260.00
Matthew Frederick	Service	09/18/2024	Review documents.	0.60	\$1,300.00	\$780.00
Alexis Swartz	Service	09/18/2024	Review document tagging suggestions from M. Rothrock and communicate internally regarding.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	09/18/2024	Attend call with Stris team to discuss deposition planning and other discovery.	1.00	\$850.00	\$850.00
Matthew Frederick	Service	09/18/2024	Communicate with Stris and LKC attorneys about	1.00	\$1,300.00	\$1,300.00



depositions.						
Alexis Swartz	Service	09/18/2024	Review native files and organize document review tags and folders.	0.60	\$850.00	\$510.00
Andrew Davis	Service	09/18/2024	Draft motion for protective order.	2.10	\$1,300.00	\$2,730.00
Will Thompson	Service	09/18/2024	Prepare possible motion-for-summary-judgment argument and analyze case strategy.	5.90	\$1,300.00	\$7,670.00
Will Thompson	Service	09/18/2024	Analyze draft motion for protective order re third-party subpoenas from Whinstone.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	09/18/2024	Analyze options for offensive depositions of Whinstone employees and witnesses.	0.70	\$1,300.00	\$910.00
Jacob Richards	Service	09/18/2024	Communicate with LKC team regarding found in Whinstone production.	0.40	\$850.00	\$340.00
Jacob Richards	Service	09/18/2024	Review hearing transcript from March 2024 for inclusion in deposition outline and prep materials.	0.70	\$850.00	\$595.00
Jacob Richards	Service	09/18/2024	Review Whinstone disclosures of hearing witnesses.	0.20	\$850.00	\$170.00
Mark Rothrock	Service	09/19/2024	Conduct document review and standalone document tagging.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	09/19/2024	Accompany expert to and from Rockdale site in preparation for report drafting.	7.00	\$850.00	\$5,950.00
Alexis Swartz	Service	09/19/2024	Discuss expert visit and document collection with P. Brody.	0.60	\$850.00	\$510.00
Alexis Swartz	Service	09/19/2024	Communicate internally regarding expert report.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	09/19/2024	Communicate internally and with local counsel regarding third party subpoenas.	0.30	\$850.00	\$255.00

Alexis Swartz	Service	09/19/2024	Review expert follow up questions.	0.40	\$850.00	\$340.00
Mark Rothrock	Service	09/19/2024	Review and analyze standalone documents.	1.40	\$850.00	\$1,190.00
Andrew Davis	Service	09/19/2024	Discuss Rhodium RFP and case strategy with W. Thompson.	0.30	\$1,300.00	\$390.00
Andrew Davis	Service	09/19/2024	Analyze and comment on responses to requests for production.	1.30	\$1,300.00	\$1,690.00
Will Thompson	Service	09/19/2024	Analyze draft RFP responses; communicate with co-counsel re review of draft RFP responses.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	09/19/2024	Revise retention application and related filings for bankruptcy court.	0.80	\$1,300.00	\$1,040.00
Will Thompson	Service	09/19/2024	Travel to and from Rockdale site for expert visit.	2.00	\$1,300.00	\$2,600.00
Will Thompson	Service	09/19/2024	Analyze Whinstone production deficiencies.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	09/19/2024	Visit Rockdale site with potential expert witness; analyze potential expert testimony.	3.70	\$1,300.00	\$4,810.00
Mark Rothrock	Service	09/20/2024	Draft deficiency letter regarding TXU billing.	2.40	\$850.00	\$2,040.00
Alexis Swartz	Service	09/20/2024	Communicate internally and with local counsel regarding third party subpoenas.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	09/20/2024	Review Whinstone production.	0.30	\$850.00	\$255.00
Andrew Davis	Service	09/20/2024	Analyze RFP response and make motion for protective order consistent with same.	1.10	\$1,300.00	\$1,430.00
Will Thompson	Service	09/20/2024	Communicate with co-counsel re RFP responses.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	09/20/2024	Analyze issues with Whinstone production of	0.10	\$1,300.00	\$130.00

			documents.			
Will Thompson	Service	09/20/2024	Prepare motion-for-summary-judgment argument.	1.30	\$1,300.00	\$1,690.00
Alexis Swartz	Service	09/21/2024	Review Whinstone documents.	0.50	\$850.00	\$425.00
Will Thompson	Service	09/22/2024	Revise retention application and related filings for bankruptcy court.	1.10	\$1,300.00	\$1,430.00
Andrew Davis	Service	09/23/2024	Communicate with co-counsel re discovery issues, including comments to draft motion for protective order.	0.40	\$1,300.00	\$520.00
Alexis Swartz	Service	09/23/2024	Review correspondence regarding Whinstone request to inspect Rockdale.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	09/23/2024	Communicate internally regarding third party subpoenas, outstanding discovery, deficiency letters, and document review.	0.60	\$850.00	\$510.00
Mark Rothrock	Service	09/23/2024	Document review for TXU bills.	1.00	\$850.00	\$850.00
Alexis Swartz	Service	09/23/2024	Attend in firm call to discuss discovery and upcoming depositions.	0.50	\$850.00	\$425.00
Mark Rothrock	Service	09/23/2024	Strategize with LKC Rhodium Team.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	09/23/2024	Discuss draft deficiency letter with M. Rothrock.	0.20	\$850.00	\$170.00
Jonathan Cohn	Service	09/23/2024	Weekly LKC team call.	0.50	\$1,400.00	\$700.00
Alexis Swartz	Service	09/23/2024	Communicate internally and with co-counsel regarding third party subpoenas.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	09/23/2024	Revise second draft deficiency letter.	0.40	\$850.00	\$340.00
Todd Disher	Service	09/23/2024	Analyze next steps with LKC legal team.	0.50	\$1,300.00	\$650.00

Gabriela Gonzalez-Araiza	Service	09/23/2024	Draft list of tagged documents from productions reviewed that are missing attachments.	1.70	\$1,000.00	\$1,700.00
Jacob Richards	Service	09/23/2024	LKC internal call.	0.50	\$850.00	\$425.00
Will Thompson	Service	09/23/2024	Communicate with LKC case team re pending discovery tasks and case strategy.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	09/23/2024	Analyze issues with lack of response to third-party subpoenas.	0.10	\$1,300.00	\$130.00
Andrew Davis	Service	09/23/2024	Communicate internally re trial preparation strategy.	0.60	\$1,300.00	\$780.00
Alexis Swartz	Service	09/24/2024	Communicate with expert.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	09/24/2024	Communicate internally and with co-counsel regarding third party subpoenas.	0.40	\$850.00	\$340.00
Matthew Frederick	Service	09/24/2024	Draft notice of 30(b)(6) deposition.	0.20	\$1,300.00	\$260.00
Matthew Frederick	Service	09/24/2024	Communicate with client and outside counsel about discovery requests.	0.70	\$1,300.00	\$910.00
Alexis Swartz	Service	09/24/2024	Attend call with client.	0.70	\$850.00	\$595.00
Mark Rothrock	Service	09/24/2024	Client call.	0.50	\$850.00	\$425.00
Jonathan Cohn	Service	09/24/2024	Call w client and LKC-Stris team.	0.50	\$1,400.00	\$700.00
Todd Disher	Service	09/24/2024	Discuss Whinstone's allegations with legal team.	0.80	\$1,300.00	\$1,040.00
Mark Rothrock	Service	09/24/2024	Research issues related to third-party subpoenas.	2.40	\$850.00	\$2,040.00
Will Thompson	Service	09/24/2024	Analyze strategy for depositions and dispositive motion.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	09/24/2024	Communicate with client and co-counsel.	0.70	\$1,300.00	\$910.00
Will Thompson	Service	09/24/2024	Communicate with client and co-counsel.	1.00	\$1,300.00	\$1,300.00
Andrew Davis	Service	09/24/2024	Coordinate obtaining	1.20	\$1,300.00	\$1,560.00

			responses to Rhodium-issued third-party subpoena to Ledoux, Harris, and Theriot.			
Andrew Davis	Service	09/24/2024	Prepare for offensive deposition, including review of December 2023 testimony.	1.00	\$1,300.00	\$1,300.00
Andrew Davis	Service	09/24/2024	Participate in call with H. Marsh and J. Ledoux.	0.30	\$1,300.00	\$390.00
Alexis Swartz	Service	09/25/2024	Review Whinstone response to deficiency letter and communicate internally regarding.	1.10	\$850.00	\$935.00
Matthew Frederick	Service	09/25/2024	Draft 30(b)(6) notice and outline.	0.30	\$1,300.00	\$390.00
Alexis Swartz	Service	09/25/2024	Review Whinstone documents.	1.00	\$850.00	\$850.00
Mark Rothrock	Service	09/25/2024	Call regarding Whinstone discovery.	1.10	\$850.00	\$935.00
Alexis Swartz	Service	09/25/2024	Discuss document discovery with Stris and LKC teams.	1.10	\$850.00	\$935.00
Alexis Swartz	Service	09/25/2024	Revise second draft deficiency letter.	0.40	\$850.00	\$340.00
Mark Rothrock	Service	09/25/2024	Review documents to identify TXU bills.	0.90	\$850.00	\$765.00
Mark Rothrock	Service	09/25/2024	Draft email regarding motion for contempt under Rule 45(g).	0.50	\$850.00	\$425.00
Gabriela Gonzalez-Araiza	Service	09/25/2024	Review document productions for missing attachments to assess relevance and production deficiencies.	2.30	\$1,000.00	\$2,300.00
Will Thompson	Service	09/25/2024	Analyze issues re potential expert report.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	09/25/2024	Analyze draft interrogatory responses.	1.20	\$1,300.00	\$1,560.00
Will Thompson	Service	09/25/2024	Analyze strategy re offensive discovery follow-up for Whinstone production and information needed for	0.80	\$1,300.00	\$1,040.00

expert analysis.						
Andrew Davis	Service	09/25/2024	Analyze documents related to deposition outline and draft timeline.	4.00	\$1,300.00	\$5,200.00
Andrew Davis	Service	09/25/2024	Review case timeline as background for depositions and motion preparation.	2.10	\$1,300.00	\$2,730.00
Andrew Davis	Service	09/25/2024	Communicate internally re third-party subpoena enforcement.	0.40	\$1,300.00	\$520.00
Mark Rothrock	Service	09/26/2024	Document review of Whinstone Productions 3 and 4.	5.20	\$850.00	\$4,420.00
Alexis Swartz	Service	09/26/2024	Review Whinstone text message production and discuss internally.	1.30	\$850.00	\$1,105.00
Alexis Swartz	Service	09/26/2024	Review draft discovery letters and briefs and communicate internally regarding.	0.50	\$850.00	\$425.00
Jacob Richards	Service	09/26/2024	Review correspondence regarding response to Whinstone on inspection of Rhodium facilities.	0.30	\$850.00	\$255.00
Jacob Richards	Service	09/26/2024	Review correspondence re Whinstone filing seeking hearing; proposed response.	0.40	\$850.00	\$340.00
Will Thompson	Service	09/26/2024	Communicate with co-counsel re outline for potential expert report.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	09/26/2024	Communicate with co-counsel re third-party document production pursuant to third-party subpoenas.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	09/26/2024	Analyze issues related to disclosure of preliminary witness list.	0.20	\$1,300.00	\$260.00
Todd Disher	Service	09/26/2024	Analyze key documents related to Whinstone's claims to begin to prepare for depositions.	1.30	\$1,300.00	\$1,690.00
Andrew Davis	Service	09/26/2024	Draft and revise offensive	2.90	\$1,300.00	\$3,770.00

deposition outline.						
Andrew Davis	Service	09/26/2024	Review and revise draft response to motion for status conference.	0.70	\$1,300.00	\$910.00
Andrew Davis	Service	09/26/2024	Coordinate third-party subpoena enforcement.	1.00	\$1,300.00	\$1,300.00
Mark Rothrock	Service	09/27/2024	Review and analyze Whinstone productions 3 and 4.	8.30	\$850.00	\$7,055.00
Alexis Swartz	Service	09/27/2024	Review documents.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	09/27/2024	Communicate internally and with co counsel regarding third party subpoenas.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	09/27/2024	Communicate internally regarding document review.	0.30	\$850.00	\$255.00
Jacob Richards	Service	09/27/2024	Communicate with A. Swartz re deposition outline updates with hot docs.	0.20	\$850.00	\$170.00
Jacob Richards	Service	09/27/2024	Review and tag Whinstone 6th production documents.	2.10	\$850.00	\$1,785.00
Will Thompson	Service	09/27/2024	Communicate with co-counsel re third-party document production pursuant to third-party subpoenas.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	09/27/2024	Analyze issues related to filing of motion for partial summary judgment.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	09/27/2024	Analyze Whinstone's preliminary witness list and related document-custodian issues.	0.30	\$1,300.00	\$390.00
Andrew Davis	Service	09/27/2024	Revise draft motion for summary judgment.	2.40	\$1,300.00	\$3,120.00
Andrew Davis	Service	09/27/2024	Communicate internally re draft motion for partial summary judgment.	0.20	\$1,300.00	\$260.00
Andrew Davis	Service	09/27/2024	Analyze draft response to first set of interrogatories.	0.40	\$1,300.00	\$520.00

Mark Rothrock	Service	09/28/2024	Review documents.	1.00	\$850.00	\$850.00
Alexis Swartz	Service	09/28/2024	Review Whinstone produced documents.	1.40	\$850.00	\$1,190.00
Alexis Swartz	Service	09/29/2024	Review Whinstone Document productions.	1.40	\$850.00	\$1,190.00
Will Thompson	Service	09/29/2024	Communicate with co-counsel re Whinstone's proposed inspection of the Rockdale site.	0.20	\$1,300.00	\$260.00
Alexis Swartz	Service	09/30/2024	Review Whinstone documents.	0.90	\$850.00	\$765.00
Alexis Swartz	Service	09/30/2024	Communicate internally regarding case tasks.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	09/30/2024	Communicate with Stris regarding expert report.	0.10	\$850.00	\$85.00
Alexis Swartz	Service	09/30/2024	Communicate with team regarding various case matters, third party discovery, and experts.	0.40	\$850.00	\$340.00
Matthew Frederick	Service	09/30/2024	Draft deposition outline.	1.80	\$1,300.00	\$2,340.00
Alexis Swartz	Service	09/30/2024	Discuss expert document requests with P. Brody.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	09/30/2024	Attend in firm meeting to discuss discovery and upcoming cases tasks.	0.60	\$850.00	\$510.00
Mark Rothrock	Service	09/30/2024	Review Whinstone documents.	1.20	\$850.00	\$1,020.00
Matthew Frederick	Service	09/30/2024	Communicate with LKC attorneys about discovery items and case strategy.	0.50	\$1,300.00	\$650.00
Alexis Swartz	Service	09/30/2024	Communicate internally regarding motion for partial summary judgment.	0.20	\$850.00	\$170.00
Andrew Davis	Service	09/30/2024	Communicate with co-counsel re Ledoux subpoena.	0.20	\$1,300.00	\$260.00
Andrew Davis	Service	09/30/2024	Revise motion for partial summary judgment.	0.70	\$1,300.00	\$910.00
Andrew Davis	Service	09/30/2024	Communicate internally re trial preparation strategy.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	09/30/2024	Communicate with LKC	0.50	\$1,300.00	\$650.00



			case team re pending discovery tasks and case strategy.			
Will Thompson	Service	09/30/2024	Analyze issues re MSJ.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	09/30/2024	Communicate with co-counsel re corporate-representative deposition.	0.10	\$1,300.00	\$130.00

Time Keeper	Quantity	Rate	Total
Jonathan Cohn	14.2	\$1,400.00	\$19,880.00
Andrew Davis	43.8	\$1,300.00	\$56,940.00
Todd Disher	13.3	\$1,300.00	\$17,290.00
Matthew Frederick	27.8	\$1,300.00	\$36,140.00
Gabriela Gonzalez-Araiza	16.1	\$1,000.00	\$16,100.00
Steven Lehotsky	0.4	\$1,400.00	\$560.00
Jacob Richards	25.4	\$850.00	\$21,590.00
Mark Rothrock	68.3	\$850.00	\$58,055.00
Michele Somboon	0.3	\$500.00	\$150.00
Alexis Swartz	77.2	\$850.00	\$65,620.00
Will Thompson	106.4	\$1,300.00	\$138,320.00
<b>Subtotal</b>			<b>\$432,400.91</b>
<b>Invoice Discount</b>			<b>\$95,161.25</b>
<i>20% discount (\$50k) off of first \$250k in services. 25% discount (\$45,161.25) for next \$250k in services.</i>			
<b>Total</b>			<b>\$337,239.66</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1272	12/04/2024	\$47,436.00	\$0.00	\$47,436.00
1327	12/05/2024	\$847,060.41	\$0.00	\$847,060.41

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**Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1273	12/05/2024	\$337,239.66	\$0.00	\$337,239.66
<b>Outstanding Balance</b>				<b>\$1,231,736.07</b>
<b>Total Amount Outstanding</b>				<b>\$1,231,736.07</b>

Please make all amounts payable to: Lehotsky Keller Cohn LLP

Please pay within 30 days.

## Remittance Advice

### Checking Information

**Remit checks to:** LEHOTSKY KELLER COHN LLP  
200 Massachusetts Avenue, NW Suite 700  
Washington DC 20001

### Wire Transfer Information

**Bank Name/Address:** Receiving bank: Chain Bridge Bank, N.A., McLean, VA

**Bank ABA/Routing #:** [REDACTED]

**Name/Account #:** Lehotsky Keller Cohn Operating Account  
LEHOTSKY KELLER COHN LLP  
Account number: [REDACTED]

Please include the invoice number 1273 as an additional reference so we may accurately identify and apply your payment.

Please provide adequate payment to cover the wire fees assessed by your financial institution.

# Lehotsky Keller Cohn LLP

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**  
Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**  
200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

## INVOICE

Invoice # 1327  
Date: 11/05/2024  
Due On: 12/05/2024

Invoice Number	Total
1327	\$847,060.41
<hr/>	
Subtotal	\$1,153,007.91
Tax	\$0.00
<b>Amount Due</b>	<b>\$847,060.41</b>

**Lehotsky Keller Cohn LLP**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**INVOICE**

Invoice # 1327  
Date: 11/05/2024  
Due On: 12/05/2024

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**00366-Rhodium 30MW LLC****Whinstone Litigation**

Attorney	Type	Date	Notes	Quantity	Rate	Total
Alexis Swartz	Service	10/01/2024	Gather documents and communicate internally and with co-counsel regarding experts and deposition dates.	1.00	\$850.00	\$850.00
Alexis Swartz	Service	10/01/2024	Review Whinstone and Riot document productions.	4.80	\$850.00	\$4,080.00
Alexis Swartz	Service	10/01/2024	Communicate with expert and discuss with internal and co-counsel team.	0.60	\$850.00	\$510.00
Matthew Frederick	Service	10/01/2024	Draft 30(b)(6) deposition notice and outline.	5.10	\$1,300.00	\$6,630.00
Matthew Frederick	Service	10/01/2024	Communicate with J. Stokes about corporate representative deposition.	0.20	\$1,300.00	\$260.00
Mark Rothrock	Service	10/01/2024	Document review of Whinstone Production.	4.00	\$850.00	\$3,400.00
Alexis Swartz	Service	10/01/2024	Review and revise motion for partial summary judgment.	0.20	\$850.00	\$170.00
Matthew Frederick	Service	10/01/2024	Review MSJ.	1.20	\$1,300.00	\$1,560.00
Jonathan Cohn	Service	10/01/2024	Weekly team and client call.	1.00	\$1,400.00	\$1,400.00
Will Thompson	Service	10/01/2024	Analyze 30(b)(6) topics for offensive corporate-representative deposition.	0.50	\$1,300.00	\$650.00

Todd Disher	Service	10/01/2024	Discuss strategic considerations with client representatives and legal team.	1.20	\$1,300.00	\$1,560.00
Jonathan Cohn	Service	10/01/2024	Calls and emails w LKC team re experts and MSJ.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	10/01/2024	Coordination and strategy.	0.50	\$1,400.00	\$700.00
Andrew Davis	Service	10/01/2024	Coordinate re site visit for Whinstone experts.	0.20	\$1,300.00	\$260.00
Andrew Davis	Service	10/01/2024	Communicate with Chad Harris's counsel re deposition dates and service.	0.10	\$1,300.00	\$130.00
Andrew Davis	Service	10/01/2024	Coordinate internally re deposition scheduling.	0.20	\$1,300.00	\$260.00
Andrew Davis	Service	10/01/2024	Revise motion for partial summary judgment.	1.60	\$1,300.00	\$2,080.00
Andrew Davis	Service	10/01/2024	Communicate internally re third-party subpoenas.	0.20	\$1,300.00	\$260.00
Jonathan Cohn	Service	10/01/2024	Expert witness prep.	3.50	\$1,400.00	\$4,900.00
Jonathan Cohn	Service	10/01/2024	Internal LKC strategy call.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	10/01/2024	LKC-Stris call on depositions and strategy	1.20	\$1,400.00	\$1,680.00
Jonathan Cohn	Service	10/01/2024	Weekly client call.	1.00	\$1,400.00	\$1,400.00
Jonathan Cohn	Service	10/01/2024	LKC call on strategy and next steps.	0.30	\$1,400.00	\$420.00
Jacob Richards	Service	10/01/2024	Document review for deposition prep.	3.30	\$850.00	\$2,805.00
Jacob Richards	Service	10/01/2024	Communicate internally re deposition prep.	0.20	\$850.00	\$170.00
Jonathan Cohn	Service	10/01/2024	Call w T Disher re depos.	0.20	\$1,400.00	\$280.00
Jonathan Cohn	Service	10/01/2024	Call w J Stokes re depositions.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	10/01/2024	Depo prep.	0.20	\$1,400.00	\$280.00
Jonathan Cohn	Service	10/01/2024	Internal strategy calls.	1.00	\$1,400.00	\$1,400.00
Jonathan Cohn	Service	10/01/2024	LKC strategy/trial	0.50	\$1,400.00	\$700.00

			planning call.			
Alexis Swartz	Service	10/02/2024	Communicate internally and with co counsel regarding case management items, discovery.	0.50	\$850.00	\$425.00
Mark Rothrock	Service	10/02/2024	Document review of Whinstone Production 7; Riot Email Production.	9.50	\$850.00	\$8,075.00
Matthew Frederick	Service	10/02/2024	Draft 30(b)(6) deposition notice.	1.30	\$1,300.00	\$1,690.00
Matthew Frederick	Service	10/02/2024	Communicate with J. Stokes about Rockdale site visit.	0.20	\$1,300.00	\$260.00
Matthew Frederick	Service	10/02/2024	Prepare for Rockdale site visit.	0.80	\$1,300.00	\$1,040.00
Alexis Swartz	Service	10/02/2024	Discuss discovery with P. Brody and H Marsh.	0.60	\$850.00	\$510.00
Alexis Swartz	Service	10/02/2024	Communicate internally and with co counsel regarding strategy.	0.30	\$850.00	\$255.00
Jonathan Cohn	Service	10/02/2024	Strategy call w J Stokes.	0.60	\$1,400.00	\$840.00
Matthew Frederick	Service	10/02/2024	Revise response to motion to remand.	4.20	\$1,300.00	\$5,460.00
Alexis Swartz	Service	10/02/2024	Review Whinstone documents and communicate with Stris team regarding.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	10/02/2024	Review Whinstone/Riot document production.	1.30	\$850.00	\$1,105.00
Matthew Frederick	Service	10/02/2024	Communicate internally about response to motion to remand.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	10/02/2024	Help Province team prepare bankruptcy filings related to litigation.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	10/02/2024	Analyze revisions to response to motion to remand.	0.20	\$1,300.00	\$260.00
Andrew Davis	Service	10/02/2024	Review documents and previous proceedings for deposition prep.	0.80	\$1,300.00	\$1,040.00

Andrew Davis	Service	10/02/2024	Analyze and comment on 30(b)(6) deposition notice.	0.10	\$1,300.00	\$130.00
Andrew Davis	Service	10/02/2024	Prepare for site inspection by Whinstone experts.	0.20	\$1,300.00	\$260.00
Andrew Davis	Service	10/02/2024	Communicate re third-party discovery issues.	0.10	\$1,300.00	\$130.00
Andrew Davis	Service	10/02/2024	Draft information to provide to bankruptcy counsel re roll-up litigation for litigation disclosures.	0.40	\$1,300.00	\$520.00
Alexis Swartz	Service	10/03/2024	Communicate internally and with co counsel regarding discovery, third party subpoenas, and other case management tasks.	0.80	\$850.00	\$680.00
Alexis Swartz	Service	10/03/2024	Communicate with J. Ledoux about third party subpoena.	0.10	\$850.00	\$85.00
Mark Rothrock	Service	10/03/2024	Review Riot production.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	10/03/2024	Communicate with client.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	10/03/2024	Communicate internally and with expert about expert report.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	10/03/2024	Review whinstone productions and communicate internally regarding.	2.00	\$850.00	\$1,700.00
Alexis Swartz	Service	10/03/2024	Discuss James Ledoux subpoena internally and with co-counsel.	0.20	\$850.00	\$170.00
Matthew Frederick	Service	10/03/2024	Attend site visit by Whinstone experts.	6.00	\$1,300.00	\$7,800.00
Matthew Frederick	Service	10/03/2024	Travel to Rockdale site for premises inspection.	2.50	\$650.00	\$1,625.00
Jonathan Cohn	Service	10/03/2024	Call w LKC-Stris team re depositions.	0.30	\$1,400.00	\$420.00
Will Thompson	Service	10/03/2024	Analyze MSJ arguments.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	10/03/2024	Analyze issues with potential direct	0.30	\$1,300.00	\$390.00



witnesses.						
Andrew Davis	Service	10/03/2024	Supervise Whinstone expert site visit to Rockdale facility.	6.00	\$1,300.00	\$7,800.00
Andrew Davis	Service	10/03/2024	Communicate with other outside counsel re read-out of site-visit and third-party discovery.	0.20	\$1,300.00	\$260.00
Andrew Davis	Service	10/03/2024	Analyze opposition to remand.	0.20	\$1,300.00	\$260.00
Andrew Davis	Service	10/03/2024	Travel to Rockdale facility.	3.40	\$650.00	\$2,210.00
Jonathan Cohn	Service	10/04/2024	Review Whinstone's MSJ and outline response.	1.00	\$1,400.00	\$1,400.00
Alexis Swartz	Service	10/04/2024	Communicate internally and with co-counsel regarding discovery.	0.60	\$850.00	\$510.00
Alexis Swartz	Service	10/04/2024	Review Whinstone MSJ.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	10/04/2024	Review Whinstone document productions.	1.00	\$850.00	\$850.00
Alexis Swartz	Service	10/04/2024	Discuss internally motion for summary judgment.	0.90	\$850.00	\$765.00
Matthew Frederick	Service	10/04/2024	Review MSJ and exhibits.	0.90	\$1,300.00	\$1,170.00
Matthew Frederick	Service	10/04/2024	Communicate with LKC attorneys about MSJ briefs.	0.80	\$1,300.00	\$1,040.00
Mark Rothrock	Service	10/04/2024	Research merits issues.	4.40	\$850.00	\$3,740.00
Matthew Frederick	Service	10/04/2024	Research contractual defenses.	1.40	\$1,300.00	\$1,820.00
Alexis Swartz	Service	10/04/2024	Communicate internally and with expert regarding report.	0.80	\$850.00	\$680.00
Alexis Swartz	Service	10/04/2024	Revise draft deficiency letter.	0.70	\$850.00	\$595.00
Matthew Frederick	Service	10/04/2024	Review revised draft of opposition to motion to remand.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	10/04/2024	Analyze issues related to expert report and data.	0.60	\$1,300.00	\$780.00

Will Thompson	Service	10/04/2024	Help Province team prepare bankruptcy filings related to litigation.	1.10	\$1,300.00	\$1,430.00
Will Thompson	Service	10/04/2024	Coordinate and assign research projects to support our MSJ briefing.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	10/04/2024	Analyze revisions to response to motion to remand.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	10/04/2024	Prepare for fact witness deposition.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	10/04/2024	Analyze Whinstone's MSJ and our responses.	2.00	\$1,300.00	\$2,600.00
Andrew Davis	Service	10/04/2024	Communicate with bankruptcy counsel re roll-up litigation for litigation disclosures.	0.20	\$1,300.00	\$260.00
Andrew Davis	Service	10/04/2024	Revise draft motion for summary judgment.	1.70	\$1,300.00	\$2,210.00
Andrew Davis	Service	10/04/2024	Communicate with LKC team re written motions.	0.90	\$1,300.00	\$1,170.00
Andrew Davis	Service	10/04/2024	Prepare for deposition.	1.60	\$1,300.00	\$2,080.00
Andrew Davis	Service	10/04/2024	Prepare for deposition.	0.50	\$1,300.00	\$650.00
Alexis Swartz	Service	10/05/2024	Review draft and final deficiency letters.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	10/05/2024	Communicate with expert regarding report.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	10/06/2024	Communicate internally regarding depo planning and discovery.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	10/06/2024	Review Whinstone production.	1.90	\$850.00	\$1,615.00
Mark Rothrock	Service	10/06/2024	Merits issue research.	2.50	\$850.00	\$2,125.00
Will Thompson	Service	10/06/2024	Analyze offensive deposition schedule.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	10/06/2024	Review expert analysis.	0.10	\$1,300.00	\$130.00
Jonathan Cohn	Service	10/06/2024	Review contracts; call w J Stokes re same; emails re depositions.	1.00	\$1,400.00	\$1,400.00
Alexis Swartz	Service	10/07/2024	Communicate internally	0.30	\$850.00	\$255.00

			and with co counsel regarding discovery, depositions, and other case management matters.			
Alexis Swartz	Service	10/07/2024	Analyze and communicate regarding deposition scheduling.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	10/07/2024	Communicate internally and with co counsel regarding deposition planning.	0.90	\$850.00	\$765.00
Alexis Swartz	Service	10/07/2024	Review draft expert report.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	10/07/2024	Review Whinstone documents and communicate internally regarding.	0.80	\$850.00	\$680.00
Jonathan Cohn	Service	10/07/2024	Calls re depositions w LKC team; and W. Thompson.	0.80	\$1,400.00	\$1,120.00
Jonathan Cohn	Service	10/07/2024	Review Whinstone's ROG responses.	0.20	\$1,400.00	\$280.00
Alexis Swartz	Service	10/07/2024	Discuss deposition planning with Stris team.	0.90	\$850.00	\$765.00
Alexis Swartz	Service	10/07/2024	Communicate regarding expert report.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	10/07/2024	Format expert report.	0.70	\$850.00	\$595.00
Alexis Swartz	Service	10/07/2024	Review questions from expert, research documents, and communicate regarding.	1.20	\$850.00	\$1,020.00
Matthew Frederick	Service	10/07/2024	Communicate with LKC attorneys about deposition scheduling and strategy.	0.50	\$1,300.00	\$650.00
Matthew Frederick	Service	10/07/2024	Draft deposition notice.	2.50	\$1,300.00	\$3,250.00
Alexis Swartz	Service	10/07/2024	Review Whinstone/Riot documents.	2.40	\$850.00	\$2,040.00
Alexis Swartz	Service	10/07/2024	Prepare for and attend call with expert.	0.80	\$850.00	\$680.00
Alexis Swartz	Service	10/07/2024	Provide Rule 26 information to expert.	0.30	\$850.00	\$255.00

Jonathan Cohn	Service	10/07/2024	Expert call re draft.	0.50	\$1,400.00	\$700.00
Alexis Swartz	Service	10/07/2024	Discuss expert report and depo planning with W. Thompson.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	10/07/2024	Review notice of termination and communicate with expert regarding.	0.40	\$850.00	\$340.00
Todd Disher	Service	10/07/2024	Discuss upcoming deposition scheduling with LKC legal team.	0.60	\$1,300.00	\$780.00
Alexis Swartz	Service	10/07/2024	Review Whinstone documents on financial productions and communicate internally regarding.	0.30	\$850.00	\$255.00
Matthew Frederick	Service	10/07/2024	Communicate with LKC and Stris attorneys about discovery and depositions.	1.50	\$1,300.00	\$1,950.00
Will Thompson	Service	10/07/2024	Analyze draft expert report.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	10/07/2024	Analyze offensive deposition strategy and prepare for upcoming depositions.	2.80	\$1,300.00	\$3,640.00
Andrew Davis	Service	10/07/2024	Communicate internally re deposition strategy and schedule.	0.60	\$1,300.00	\$780.00
Andrew Davis	Service	10/07/2024	Prepare for deposition.	5.30	\$1,300.00	\$6,890.00
Alexis Swartz	Service	10/08/2024	Review Whinstone documents and draft deposition outline.	3.20	\$850.00	\$2,720.00
Alexis Swartz	Service	10/08/2024	Communicate regarding deposition scheduling.	0.30	\$850.00	\$255.00
Matthew Frederick	Service	10/08/2024	Draft deposition outlines.	5.30	\$1,300.00	\$6,890.00
Alexis Swartz	Service	10/08/2024	Review documents for expert and communicate with co-counsel regarding.	0.80	\$850.00	\$680.00
Alexis Swartz	Service	10/08/2024	Discuss discovery and case strategy with W. Thompson.	0.40	\$850.00	\$340.00

Mark Rothrock	Service	10/08/2024	Review text messages production.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	10/08/2024	Communicate with expert regarding report.	1.00	\$850.00	\$850.00
Alexis Swartz	Service	10/08/2024	Communicate with client.	0.20	\$850.00	\$170.00
Jonathan Cohn	Service	10/08/2024	Emails re discovery.	0.30	\$1,400.00	\$420.00
Alexis Swartz	Service	10/08/2024	Review Chad Harris depo notice.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	10/08/2024	Discuss experts and deposition planning with co-counsel.	1.80	\$850.00	\$1,530.00
Alexis Swartz	Service	10/08/2024	Review Whinstone document production.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	10/08/2024	Discuss document review with A. Davis.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	10/08/2024	Communicate with client representative.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	10/08/2024	Discuss experts with P. Brody.	0.10	\$850.00	\$85.00
Jonathan Cohn	Service	10/08/2024	Call w LKC and Stris re experts.	1.50	\$1,400.00	\$2,100.00
Jonathan Cohn	Service	10/08/2024	Weekly client strategy call.	0.80	\$1,400.00	\$1,120.00
Alexis Swartz	Service	10/08/2024	Communicate with Stris team regarding documents produced.	0.10	\$850.00	\$85.00
Jonathan Cohn	Service	10/08/2024	Review research and correspondence re insolvency claim.	1.50	\$1,400.00	\$2,100.00
Jonathan Cohn	Service	10/08/2024	Calls re insolvency claim.	0.70	\$1,400.00	\$980.00
Will Thompson	Service	10/08/2024	Prepare for offensive depositions in motion-to-assume proceedings.	0.80	\$1,300.00	\$1,040.00
Will Thompson	Service	10/08/2024	Communicate with co-counsel re expert-witness strategy.	1.60	\$1,300.00	\$2,080.00
Will Thompson	Service	10/08/2024	Communicate with M. Frederick re research project.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	10/08/2024	Communicate with	0.40	\$1,300.00	\$520.00

			Province and co-counsel re schedules listing litigation to be filed with bankruptcy court.			
Will Thompson	Service	10/08/2024	Communicate with client and co-counsel re pending discovery tasks and case strategy.	0.80	\$1,300.00	\$1,040.00
Will Thompson	Service	10/08/2024	Analyze research re termination of contracts in the bankruptcy context.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	10/08/2024	Prepare for defensive depositions for motion-to-assume proceedings.	0.70	\$1,300.00	\$910.00
Andrew Davis	Service	10/08/2024	Prepare for depositions.	5.20	\$1,300.00	\$6,760.00
Alexis Swartz	Service	10/09/2024	Review documents and draft depo outline.	4.70	\$850.00	\$3,995.00
Alexis Swartz	Service	10/09/2024	Discuss experts and case strategy with J. Cohn.	0.40	\$850.00	\$340.00
Jonathan Cohn	Service	10/09/2024	Review Rhodium expert report.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	10/09/2024	Review memo and call w A. Swartz re insolvency claim.	0.40	\$1,400.00	\$560.00
Alexis Swartz	Service	10/09/2024	Review expert report and communicate regarding.	0.90	\$850.00	\$765.00
Alexis Swartz	Service	10/09/2024	Communicate with expert regarding report.	0.40	\$850.00	\$340.00
Matthew Frederick	Service	10/09/2024	Research affirmative defenses.	0.80	\$1,300.00	\$1,040.00
Matthew Frederick	Service	10/09/2024	Review Whinstone documents.	2.60	\$1,300.00	\$3,380.00
Alexis Swartz	Service	10/09/2024	Analyze deposition schedule.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	10/09/2024	Attend meet and confer.	0.80	\$850.00	\$680.00
Alexis Swartz	Service	10/09/2024	Prepare for and attend call with co-counsel to discuss expert report.	1.60	\$850.00	\$1,360.00
Alexis Swartz	Service	10/09/2024	Review and edit revised expert report.	2.90	\$850.00	\$2,465.00

Alexis Swartz	Service	10/09/2024	Review damages expert report.	0.20	\$850.00	\$170.00
Jonathan Cohn	Service	10/09/2024	Call with client.	0.30	\$1,400.00	\$420.00
Jonathan Cohn	Service	10/09/2024	Calls with W. Thompson and J. Stokes re experts.	1.00	\$1,400.00	\$1,400.00
Will Thompson	Service	10/09/2024	Prepare for defensive depositions for motion-to-assume proceedings.	1.40	\$1,300.00	\$1,820.00
Will Thompson	Service	10/09/2024	Analyze Temple site issue.	0.70	\$1,300.00	\$910.00
Andrew Davis	Service	10/09/2024	Prepare for deposition.	6.00	\$1,300.00	\$7,800.00
Alexis Swartz	Service	10/10/2024	Review and edit revised expert report.	3.60	\$850.00	\$3,060.00
Matthew Frederick	Service	10/10/2024	Review documents for deposition outline.	3.30	\$1,300.00	\$4,290.00
Alexis Swartz	Service	10/10/2024	Communicate regarding fact witness deposition.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	10/10/2024	Discuss expert report and case with J. Cohn.	0.20	\$850.00	\$170.00
Matthew Frederick	Service	10/10/2024	Revise motion for partial summary judgment.	2.50	\$1,300.00	\$3,250.00
Alexis Swartz	Service	10/10/2024	Discuss expert report with expert and J. Cohn.	1.10	\$850.00	\$935.00
Jonathan Cohn	Service	10/10/2024	Calls with internal team re experts.	1.00	\$1,400.00	\$1,400.00
Jonathan Cohn	Service	10/10/2024	Call with Rhodium expert.	0.70	\$1,400.00	\$980.00
Alexis Swartz	Service	10/10/2024	Discuss expert reports with co-counsel.	0.60	\$850.00	\$510.00
Jonathan Cohn	Service	10/10/2024	Review MSJ and email W. Thompson.	0.20	\$1,400.00	\$280.00
Alexis Swartz	Service	10/10/2024	Communicate internally and with co-counsel regarding depositions and discovery.	0.40	\$850.00	\$340.00
Will Thompson	Service	10/10/2024	Analyze draft expert report.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	10/10/2024	Communicate with J. Stokes re motion-to-assume strategy.	0.50	\$1,300.00	\$650.00

Will Thompson	Service	10/10/2024	Analyze Rhodium expert reports.	0.40	\$1,300.00	\$520.00
Andrew Davis	Service	10/10/2024	Prepare for deposition.	1.30	\$1,300.00	\$1,690.00
Andrew Davis	Service	10/10/2024	Prepare for deposition.	2.00	\$1,300.00	\$2,600.00
Andrew Davis	Service	10/10/2024	Revise draft motion for summary judgment.	2.30	\$1,300.00	\$2,990.00
Alexis Swartz	Service	10/11/2024	Communicate internally and with co-counsel regarding case management and depositions.	0.10	\$850.00	\$85.00
Alexis Swartz	Service	10/11/2024	Review documents and edit fact witness depo outline.	5.60	\$850.00	\$4,760.00
Alexis Swartz	Service	10/11/2024	Communicate with expert regarding report.	0.70	\$850.00	\$595.00
Matthew Frederick	Service	10/11/2024	Summarize research on quasi-estoppel.	1.10	\$1,300.00	\$1,430.00
Alexis Swartz	Service	10/11/2024	Discuss discovery deficiencies with co-counsel.	0.60	\$850.00	\$510.00
Alexis Swartz	Service	10/11/2024	Discuss expert report with internal team and co-counsel.	0.60	\$850.00	\$510.00
Jonathan Cohn	Service	10/11/2024	Review draft expert reports.	2.00	\$1,400.00	\$2,800.00
Alexis Swartz	Service	10/11/2024	Review and edit revised expert report.	1.90	\$850.00	\$1,615.00
Will Thompson	Service	10/11/2024	Analyze draft reply iso motion to transfer for potential effect on motion-to-assume proceedings.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	10/11/2024	Prepare for fact witness deposition.	1.10	\$1,300.00	\$1,430.00
Will Thompson	Service	10/11/2024	Analyze and revise draft MSJ.	2.40	\$1,300.00	\$3,120.00
Andrew Davis	Service	10/11/2024	Communicate with W. Thompson re draft motion for summary judgment.	0.60	\$1,300.00	\$780.00
Andrew Davis	Service	10/11/2024	Review draft motion to	0.20	\$1,300.00	\$260.00



			transfer reply.			
Andrew Davis	Service	10/11/2024	Prepare for deposition.	3.30	\$1,300.00	\$4,290.00
Jonathan Cohn	Service	10/12/2024	Revise MSJ.	1.30	\$1,400.00	\$1,820.00
Jonathan Cohn	Service	10/12/2024	Review expert report.	1.00	\$1,400.00	\$1,400.00
Alexis Swartz	Service	10/12/2024	Review and edit expert report and communicate internally regarding.	4.20	\$850.00	\$3,570.00
Jonathan Cohn	Service	10/12/2024	Calls re experts.	0.70	\$1,400.00	\$980.00
Will Thompson	Service	10/12/2024	Analyze and revise draft MSJ.	3.50	\$1,300.00	\$4,550.00
Will Thompson	Service	10/12/2024	Communicate with co-counsel re draft MSJ.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	10/12/2024	Prepare for Rhodium expert deposition.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	10/12/2024	Analyze trial roles and strategy.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	10/12/2024	Prepare for fact witness deposition.	0.60	\$1,300.00	\$780.00
Alexis Swartz	Service	10/13/2024	Review and edit expert report and communicate internally regarding.	5.60	\$850.00	\$4,760.00
Jonathan Cohn	Service	10/13/2024	Calls and review of expert reports.	2.20	\$1,400.00	\$3,080.00
Jonathan Cohn	Service	10/13/2024	Outline tasks.	0.30	\$1,400.00	\$420.00
Jonathan Cohn	Service	10/13/2024	Call with W. Thompson re strategy.	0.30	\$1,400.00	\$420.00
Alexis Swartz	Service	10/13/2024	Discuss deposition planning with J. Cohn.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	10/13/2024	Look for documents for fact witness deposition.	0.50	\$850.00	\$425.00
Jonathan Cohn	Service	10/13/2024	Calls with J. Stokes re trial/witnesses.	0.80	\$1,400.00	\$1,120.00
Alexis Swartz	Service	10/13/2024	Analyze and draft deposition schedule.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	10/13/2024	Discuss internally expert reports.	0.40	\$850.00	\$340.00
Will Thompson	Service	10/13/2024	Prepare for fact witness deposition.	5.10	\$1,300.00	\$6,630.00

Will Thompson	Service	10/13/2024	Analyze and communicate with co-counsel re Rhodium's expert reports and likely responses.	1.00	\$1,300.00	\$1,300.00
Matthew Frederick	Service	10/13/2024	Review documents for deposition outline.	2.80	\$1,300.00	\$3,640.00
Michele Somboon	Service	10/13/2024	Begin proofreading expert report.	3.50	\$500.00	\$1,750.00
Andrew Davis	Service	10/13/2024	Review and analyze expert report.	3.30	\$1,300.00	\$4,290.00
Andrew Davis	Service	10/13/2024	Communicate with internal team and Stris counsel re expert reports.	0.30	\$1,300.00	\$390.00
Andrew Davis	Service	10/13/2024	Review and analyze expert reports.	0.60	\$1,300.00	\$780.00
Andrew Davis	Service	10/13/2024	Communicate with J. Cohn, W. Thompson, and A. Swartz re expert witness strategy.	0.20	\$1,300.00	\$260.00
Alexis Swartz	Service	10/14/2024	Review and edit expert report and communicate internally regarding.	4.00	\$850.00	\$3,400.00
Alexis Swartz	Service	10/14/2024	Communicate internally regarding case management.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	10/14/2024	Arrange for depositions.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	10/14/2024	Discuss case strategy internally with team.	0.80	\$850.00	\$680.00
Mark Rothrock	Service	10/14/2024	Internal LKC daily strategy meeting.	0.80	\$850.00	\$680.00
Jonathan Cohn	Service	10/14/2024	LKC team call re depositions and next steps.	0.80	\$1,400.00	\$1,120.00
Jonathan Cohn	Service	10/14/2024	Coordination and strategy.	1.50	\$1,400.00	\$2,100.00
Mark Rothrock	Service	10/14/2024	Assist W. Thompson with deposition outline and prep.	9.40	\$850.00	\$7,990.00
Matthew Frederick	Service	10/14/2024	Communicate with LKC attorneys about depositions, expert	0.60	\$1,300.00	\$780.00

			reports, and trial preparation.			
Michele Somboon	Service	10/14/2024	Finish proofreading expert report.	2.90	\$500.00	\$1,450.00
Michele Somboon	Service	10/14/2024	Create table of contents for expert report.	0.10	\$500.00	\$50.00
Alexis Swartz	Service	10/14/2024	Review and search for documents for fact witness deposition.	0.70	\$850.00	\$595.00
Alexis Swartz	Service	10/14/2024	Prepare deck for expert depo prep.	1.20	\$850.00	\$1,020.00
Alexis Swartz	Service	10/14/2024	Communicate internally and with co counsel regarding deposition planning.	0.80	\$850.00	\$680.00
Alexis Swartz	Service	10/14/2024	Attend team call regarding deposition strategy.	0.40	\$850.00	\$340.00
Jonathan Cohn	Service	10/14/2024	LKC-Stris call re experts.	1.00	\$1,400.00	\$1,400.00
Todd Disher	Service	10/14/2024	Discuss deposition strategy with LKC legal team.	0.60	\$1,300.00	\$780.00
Todd Disher	Service	10/14/2024	Analyze potential deposition topics with outside counsel legal team.	1.10	\$1,300.00	\$1,430.00
Todd Disher	Service	10/14/2024	Prepare for upcoming depositions.	1.30	\$1,300.00	\$1,690.00
Will Thompson	Service	10/14/2024	Prepare for deposition.	3.30	\$1,300.00	\$4,290.00
Will Thompson	Service	10/14/2024	Communicate with LKC case team re deposition preparations and strategy as well as expert reports.	0.70	\$1,300.00	\$910.00
Will Thompson	Service	10/14/2024	Analyze issues re expert reports.	0.60	\$1,300.00	\$780.00
Andrew Davis	Service	10/14/2024	Communicate with internal team re depositions and case strategy.	0.60	\$1,300.00	\$780.00
Andrew Davis	Service	10/14/2024	Review and analyze expert reports.	0.80	\$1,300.00	\$1,040.00

Andrew Davis	Service	10/14/2024	Analyze revised motion for summary judgment.	0.50	\$1,300.00	\$650.00
Andrew Davis	Service	10/14/2024	Review and analyze expert reports.	1.00	\$1,300.00	\$1,300.00
Andrew Davis	Service	10/14/2024	Communicate with internal team and Stris team re deposition strategy.	1.10	\$1,300.00	\$1,430.00
Alexis Swartz	Service	10/15/2024	Communicate regarding expert reports.	0.70	\$850.00	\$595.00
Alexis Swartz	Service	10/15/2024	Discuss case strategy with J. Cohn.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	10/15/2024	Communicate regarding upcoming deposition.	0.40	\$850.00	\$340.00
Mark Rothrock	Service	10/15/2024	Assist W. Thompson with prep for deposition.	2.80	\$850.00	\$2,380.00
Alexis Swartz	Service	10/15/2024	Review text messages produced by Whinstone.	2.20	\$850.00	\$1,870.00
Alexis Swartz	Service	10/15/2024	Prepare for and lead expert prep session.	3.30	\$850.00	\$2,805.00
Matthew Frederick	Service	10/15/2024	Review expert reports.	1.70	\$1,300.00	\$2,210.00
Alexis Swartz	Service	10/15/2024	Discuss case strategy and tasks internally.	0.50	\$850.00	\$425.00
Matthew Frederick	Service	10/15/2024	Communicate with LKC attorneys about deposition preparation and strategy.	0.50	\$1,300.00	\$650.00
Alexis Swartz	Service	10/15/2024	Communicate with client.	0.30	\$850.00	\$255.00
Matthew Frederick	Service	10/15/2024	Review text messages produced by Whinstone.	2.90	\$1,300.00	\$3,770.00
Alexis Swartz	Service	10/15/2024	Communicate with expert regarding reply report.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	10/15/2024	Communicate regarding deposition planning.	0.20	\$850.00	\$170.00
Mark Rothrock	Service	10/15/2024	Assist W. Thompson with prep for deposition.	0.60	\$850.00	\$510.00
Alexis Swartz	Service	10/15/2024	Review expert report.	0.40	\$850.00	\$340.00
Matthew Frederick	Service	10/15/2024	Communicate with LKC and Stris attorneys about deposition prep and	1.30	\$1,300.00	\$1,690.00

			strategy.			
Jonathan Cohn	Service	10/15/2024	Review expert reports.	0.30	\$1,400.00	\$420.00
Alexis Swartz	Service	10/15/2024	Communicate with M. Rothrock regarding documents for deposition.	0.10	\$850.00	\$85.00
Alexis Swartz	Service	10/15/2024	Pull documents for upcoming deposition.	1.30	\$850.00	\$1,105.00
Todd Disher	Service	10/15/2024	Discuss upcoming depositions with LKC legal team.	0.50	\$1,300.00	\$650.00
Todd Disher	Service	10/15/2024	Analyze strategy for offensive depositions with outside counsel legal team.	1.20	\$1,300.00	\$1,560.00
Todd Disher	Service	10/15/2024	Prepare for deposition of fact witness.	2.10	\$1,300.00	\$2,730.00
Matthew Frederick	Service	10/15/2024	Review documents for upcoming depositions.	2.40	\$1,300.00	\$3,120.00
Todd Disher	Service	10/15/2024	Prepare for deposition of additional Whinstone fact witness.	1.90	\$1,300.00	\$2,470.00
Alexis Swartz	Service	10/15/2024	Communicate with M. Rothrock regarding documents.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	10/15/2024	Analyze rebuttal report strategy.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	10/15/2024	Review expert report.	0.50	\$850.00	\$425.00
Will Thompson	Service	10/15/2024	Prepare for Whinstone fact witness deposition.	13.50	\$1,300.00	\$17,550.00
Todd Disher	Service	10/15/2024	Prepare for depositions regarding safety allegations.	2.10	\$1,300.00	\$2,730.00
Andrew Davis	Service	10/15/2024	Review and analyze expert reports.	3.00	\$1,300.00	\$3,900.00
Andrew Davis	Service	10/15/2024	Communicate with Stris team and internal team re deposition strategy.	1.20	\$1,300.00	\$1,560.00
Andrew Davis	Service	10/15/2024	Communicate with internal team re case strategy and upcoming items.	0.50	\$1,300.00	\$650.00

Andrew Davis	Service	10/15/2024	Review and analyze expert reports.	4.00	\$1,300.00	\$5,200.00
Alexis Swartz	Service	10/16/2024	Review deposition outline and pull documents.	1.60	\$850.00	\$1,360.00
Alexis Swartz	Service	10/16/2024	Communicate regarding expert report.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	10/16/2024	Prepare for and attend C. Harris depo and debrief with team.	10.00	\$850.00	\$8,500.00
Matthew Frederick	Service	10/16/2024	Communicate with LKC attorneys about pending tasks and trial strategy.	0.10	\$1,300.00	\$130.00
Matthew Frederick	Service	10/16/2024	Draft fact witness deposition outline.	8.40	\$1,300.00	\$10,920.00
Mark Rothrock	Service	10/16/2024	Assist W. Thompson with deposition prep.	2.50	\$850.00	\$2,125.00
Todd Disher	Service	10/16/2024	Continue to prepare for deposition of Whinstone fact witness.	2.00	\$1,300.00	\$2,600.00
Todd Disher	Service	10/16/2024	Continue to prepare for deposition of additional Whinstone fact witness.	2.40	\$1,300.00	\$3,120.00
Will Thompson	Service	10/16/2024	Prepare for C. Harris deposition.	3.00	\$1,300.00	\$3,900.00
Will Thompson	Service	10/16/2024	Attend and take C. Harris deposition.	8.30	\$1,300.00	\$10,790.00
Will Thompson	Service	10/16/2024	Analyze C. Harris deposition and plan next steps.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	10/16/2024	Prepare for additional fact witness deposition.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	10/16/2024	Analyze offensive deposition strategy with T. Disher.	0.70	\$1,300.00	\$910.00
Jonathan Cohn	Service	10/16/2024	C. Harris depo and break discussions.	2.00	\$1,400.00	\$2,800.00
Jonathan Cohn	Service	10/16/2024	Calls with W. Thompson and J. Stokes re experts.	0.50	\$1,400.00	\$700.00
Andrew Davis	Service	10/16/2024	Communicate with Stris team regarding damages calculations.	0.20	\$1,300.00	\$260.00

Andrew Davis	Service	10/16/2024	Communicate with P. Brody, B. Asay, and expert re expert reports and rebuttal	0.90	\$1,300.00	\$1,170.00
Andrew Davis	Service	10/16/2024	Prepare T. Disher for upcoming fact witness deposition.	0.30	\$1,300.00	\$390.00
Andrew Davis	Service	10/16/2024	Revise deposition outline draft.	1.00	\$1,300.00	\$1,300.00
Alexis Swartz	Service	10/17/2024	Communicate internally and with co counsel regarding trial management, case strategy, and depositions.	0.80	\$850.00	\$680.00
Matthew Frederick	Service	10/17/2024	Draft fact witness deposition outline.	11.40	\$1,300.00	\$14,820.00
Alexis Swartz	Service	10/17/2024	Attend team call to discuss case management.	0.80	\$850.00	\$680.00
Matthew Frederick	Service	10/17/2024	Communicate with LKC attorneys about deposition prep and case strategy.	0.80	\$1,300.00	\$1,040.00
Alexis Swartz	Service	10/17/2024	Communicate regarding expert reports.	0.60	\$850.00	\$510.00
Alexis Swartz	Service	10/17/2024	Listen in on corporate designee conferral.	0.60	\$850.00	\$510.00
Alexis Swartz	Service	10/17/2024	Research and analyze work product protections.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	10/17/2024	Edit rebuttal report.	2.10	\$850.00	\$1,785.00
Alexis Swartz	Service	10/17/2024	Communicate internally and with expert regarding calculations.	1.10	\$850.00	\$935.00
Jonathan Cohn	Service	10/17/2024	Internal LKC call re strategy and depositions	0.80	\$1,400.00	\$1,120.00
Todd Disher	Service	10/17/2024	Identify relevant documents for deposition of safety witness.	3.40	\$1,300.00	\$4,420.00
Todd Disher	Service	10/17/2024	Identify potentially relevant documents for deposition of additional fact witness.	2.90	\$1,300.00	\$3,770.00

Alexis Swartz	Service	10/17/2024	Review and analyze expert excel calculations.	1.00	\$850.00	\$850.00
Todd Disher	Service	10/17/2024	Strategize regarding upcoming discovery tasks with LKC legal team.	0.60	\$1,300.00	\$780.00
Jonathan Cohn	Service	10/17/2024	Calls re experts.	0.80	\$1,400.00	\$1,120.00
Jonathan Cohn	Service	10/17/2024	Correspondence re 30(b)(6) depositions.	0.20	\$1,400.00	\$280.00
Andrew Davis	Service	10/17/2024	Communicate internally re case strategy and upcoming items.	0.80	\$1,300.00	\$1,040.00
Andrew Davis	Service	10/17/2024	Prepare for deposition.	4.60	\$1,300.00	\$5,980.00
Will Thompson	Service	10/17/2024	Communicate with LKC case team re pending discovery tasks and case strategy.	0.80	\$1,300.00	\$1,040.00
Will Thompson	Service	10/17/2024	Communicate with J. Cohn re offensive deposition strategy.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	10/17/2024	Analyze options for taking offensive depositions of Whinstone fact witnesses and experts.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	10/17/2024	Communicate with J. Stokes re options for taking offensive depositions of Whinstone fact witnesses and experts and strategy for deposition preparation of Rhodium witnesses.	0.70	\$1,300.00	\$910.00
Will Thompson	Service	10/17/2024	Analyze Whinstone's 30(b)(6) designations and prepare for 30(b)(6) depositions.	4.20	\$1,300.00	\$5,460.00
Will Thompson	Service	10/17/2024	Communicate with T. Disher re offensive depositions.	0.80	\$1,300.00	\$1,040.00
Will Thompson	Service	10/17/2024	Analyze issues re expert deposition and communicate with co-counsel re mock deposition practice.	0.40	\$1,300.00	\$520.00



Gabriela Gonzalez-Araiza	Service	10/17/2024	Review expert report to prepare for mock deposition.	0.30	\$1,000.00	\$300.00
Jonathan Cohn	Service	10/17/2024	LKC internal strategy call.	0.70	\$1,400.00	\$980.00
Jonathan Cohn	Service	10/17/2024	LKC-Stris strategy call on fact witnesses.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	10/17/2024	Fact depo prep.	2.50	\$1,400.00	\$3,500.00
Matthew Frederick	Service	10/18/2024	Communicate with Stris attorneys about power issues.	0.20	\$1,300.00	\$260.00
Alexis Swartz	Service	10/18/2024	Communicate internally and with team regarding expert report, depositions, and other case management items.	0.90	\$850.00	\$765.00
Alexis Swartz	Service	10/18/2024	Attend in firm meeting to discuss case management and upcoming depositions.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	10/18/2024	Prepare for and lead call with expert.	1.20	\$850.00	\$1,020.00
Matthew Frederick	Service	10/18/2024	Communicate with LKC attorneys about pending projects and depo prep.	1.20	\$1,300.00	\$1,560.00
Alexis Swartz	Service	10/18/2024	Discuss expert report with J. Stokes.	0.10	\$850.00	\$85.00
Matthew Frederick	Service	10/18/2024	Communicate with expert, Stris, and LKC attorneys about power agreements.	1.10	\$1,300.00	\$1,430.00
Alexis Swartz	Service	10/18/2024	Prepare for and attend call with client and expert.	0.60	\$850.00	\$510.00
Alexis Swartz	Service	10/18/2024	Discuss experts with internal team.	0.60	\$850.00	\$510.00
Alexis Swartz	Service	10/18/2024	Attend trial logistics call.	0.90	\$850.00	\$765.00
Matthew Frederick	Service	10/18/2024	Draft deposition outline.	7.50	\$1,300.00	\$9,750.00
Jonathan Cohn	Service	10/18/2024	Review 30(b)(6) designations.	0.30	\$1,400.00	\$420.00
Jonathan Cohn	Service	10/18/2024	Review and strategize on responses to expert	3.50	\$1,400.00	\$4,900.00

			reports.			
Jonathan Cohn	Service	10/18/2024	Call re Rhodium expert.	0.40	\$1,400.00	\$560.00
Jonathan Cohn	Service	10/18/2024	LKC call re strategy and next steps.	1.50	\$1,400.00	\$2,100.00
Alexis Swartz	Service	10/18/2024	Edit rebuttal report.	2.20	\$850.00	\$1,870.00
Matthew Frederick	Service	10/18/2024	Draft deposition outline.	1.50	\$1,300.00	\$1,950.00
Matthew Frederick	Service	10/18/2024	Communicate with W. Thompson and A. Davis about deposition prep.	0.40	\$1,300.00	\$520.00
Matthew Frederick	Service	10/18/2024	Communicate with P. Brody about privilege issue.	0.10	\$1,300.00	\$130.00
Todd Disher	Service	10/18/2024	Discuss upcoming tasks with LKC legal team.	0.60	\$1,300.00	\$780.00
Todd Disher	Service	10/18/2024	Discuss rebuttal report with expert.	0.60	\$1,300.00	\$780.00
Andrew Davis	Service	10/18/2024	Attend call with expert.	0.70	\$1,300.00	\$910.00
Andrew Davis	Service	10/18/2024	Communicate internally re case strategy, deposition strategy, and upcoming items.	1.50	\$1,300.00	\$1,950.00
Andrew Davis	Service	10/18/2024	Prepare M. Frederick for upcoming deposition.	3.10	\$1,300.00	\$4,030.00
Todd Disher	Service	10/18/2024	Prepare for upcoming depositions.	1.50	\$1,300.00	\$1,950.00
Will Thompson	Service	10/18/2024	Communicate with LKC case team re pending discovery tasks and case strategy.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	10/18/2024	Prepare for fact witness deposition.	2.40	\$1,300.00	\$3,120.00
Will Thompson	Service	10/18/2024	Communicate with expert re rebuttal report and offensive depositions.	1.00	\$1,300.00	\$1,300.00
Will Thompson	Service	10/18/2024	Analyze issues re C. Harris deposition rough transcript and confidentiality order.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	10/18/2024	Review and analyze Whinstone expert report.	2.50	\$1,300.00	\$3,250.00

Will Thompson	Service	10/18/2024	Communicate with LKC case team re expert reports.	0.70	\$1,300.00	\$910.00
Will Thompson	Service	10/18/2024	Prepare for Whinstone expert deposition.	0.70	\$1,300.00	\$910.00
Will Thompson	Service	10/18/2024	Assist M. Frederick in preparation for deposition.	1.70	\$1,300.00	\$2,210.00
Alexis Swartz	Service	10/19/2024	Edit expert rebuttal.	2.40	\$850.00	\$2,040.00
Matthew Frederick	Service	10/19/2024	Communicate with W. Thompson about upcoming deposition.	0.20	\$1,300.00	\$260.00
Matthew Frederick	Service	10/19/2024	Draft deposition outline.	6.50	\$1,300.00	\$8,450.00
Alexis Swartz	Service	10/19/2024	Communicate regarding expert rebuttal.	0.40	\$850.00	\$340.00
Andrew Davis	Service	10/19/2024	Revise draft expert rebuttal and coordinate re same with P. Brody.	5.70	\$1,300.00	\$7,410.00
Jonathan Cohn	Service	10/19/2024	Correspond with W. Thompson and J. Stokes re accounting and damages.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	10/19/2024	Review Rhodium expert report.	0.50	\$1,400.00	\$700.00
Will Thompson	Service	10/19/2024	Prepare for Whinstone expert deposition.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	10/19/2024	Prepare for fact deposition.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	10/19/2024	Assist M. Frederick in preparation for deposition.	1.90	\$1,300.00	\$2,470.00
Will Thompson	Service	10/19/2024	Analyze deposition strategy with J. Stokes.	0.90	\$1,300.00	\$1,170.00
Will Thompson	Service	10/19/2024	Communicate with A. Davis re opposing expert report.	0.20	\$1,300.00	\$260.00
Todd Disher	Service	10/19/2024	Continue to prepare for deposition of Whinstone safety witness.	1.40	\$1,300.00	\$1,820.00
Alexis Swartz	Service	10/20/2024	Revise rebuttal report.	1.50	\$850.00	\$1,275.00
Jonathan Cohn	Service	10/20/2024	Review and comment on	2.80	\$1,400.00	\$3,920.00

			draft expert replies and depo outlines.			
Matthew Frederick	Service	10/20/2024	Communicate with A. Davis re upcoming deposition.	0.20	\$1,300.00	\$260.00
Matthew Frederick	Service	10/20/2024	Communicate with Stris and LKC attorneys about power contracts.	0.40	\$1,300.00	\$520.00
Matthew Frederick	Service	10/20/2024	Draft deposition outline.	6.20	\$1,300.00	\$8,060.00
Jonathan Cohn	Service	10/20/2024	Calls w LKC and Stris re power claims and damages	3.20	\$1,400.00	\$4,480.00
Alexis Swartz	Service	10/20/2024	Attend call to discuss expert deposition.	1.10	\$850.00	\$935.00
Alexis Swartz	Service	10/20/2024	Communicate regarding expert report.	0.40	\$850.00	\$340.00
Matthew Frederick	Service	10/20/2024	Communicate with LKC and Stris attorneys about deposition and expert strategy.	1.70	\$1,300.00	\$2,210.00
Michele Somboon	Service	10/20/2024	Begin proofreading expert report.	2.00	\$500.00	\$1,000.00
Will Thompson	Service	10/20/2024	Communicate with J. Stokes re expert reports and depositions.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	10/20/2024	Communicate with J. Cohn re fact deposition.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	10/20/2024	Communicate with M. Frederick re fact deposition.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	10/20/2024	Communicate with co-counsel from Stris and LKC re deposition preparations and expert reports.	1.70	\$1,300.00	\$2,210.00
Will Thompson	Service	10/20/2024	Analyze key Whinstone-produced documents for use in offensive depositions.	1.50	\$1,300.00	\$1,950.00
Todd Disher	Service	10/20/2024	Edit rebuttal report.	1.10	\$1,300.00	\$1,430.00
Todd Disher	Service	10/20/2024	Discuss rebuttal reports with Striss and LKC legal teams.	1.50	\$1,300.00	\$1,950.00

Andrew Davis	Service	10/20/2024	Communicate with internal team and Stris team re depositions and expert strategy.	1.70	\$1,300.00	\$2,210.00
Andrew Davis	Service	10/20/2024	Prepare for deposition.	3.70	\$1,300.00	\$4,810.00
Andrew Davis	Service	10/20/2024	Review and comment on expert rebuttals.	3.30	\$1,300.00	\$4,290.00
Michele Somboon	Service	10/21/2024	Finish proofreading expert report.	0.90	\$500.00	\$450.00
Alexis Swartz	Service	10/21/2024	Review and discuss ledger research.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	10/21/2024	Revise rebuttal report.	3.40	\$850.00	\$2,890.00
Jonathan Cohn	Service	10/21/2024	Review and comment on expert reports.	1.20	\$1,400.00	\$1,680.00
Alexis Swartz	Service	10/21/2024	Communicate regarding expert rebuttal report, depositions, and other case management items.	1.20	\$850.00	\$1,020.00
Jonathan Cohn	Service	10/21/2024	Emails re discovery.	0.20	\$1,400.00	\$280.00
Alexis Swartz	Service	10/21/2024	Attend in firm meeting to discuss case management and case tasks.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	10/21/2024	Communicate regarding deposition planning.	0.20	\$850.00	\$170.00
Matthew Frederick	Service	10/21/2024	Communicate with LKC attorneys about depositions and expert reports.	0.60	\$1,300.00	\$780.00
Matthew Frederick	Service	10/21/2024	Prepare for fact witness deposition.	13.90	\$1,300.00	\$18,070.00
Jonathan Cohn	Service	10/21/2024	Call w A Davis re damages expert.	0.20	\$1,400.00	\$280.00
Mark Rothrock	Service	10/21/2024	Deposition preparation.	1.30	\$850.00	\$1,105.00
Jonathan Cohn	Service	10/21/2024	Deposition prep.	1.20	\$1,400.00	\$1,680.00
Jonathan Cohn	Service	10/21/2024	Review draft opposition to MSJ.	0.50	\$1,400.00	\$700.00
Todd Disher	Service	10/21/2024	Analyze next strategic steps with LKC legal team.	0.30	\$1,300.00	\$390.00

Todd Disher	Service	10/21/2024	Continue to revise rebuttal report.	0.80	\$1,300.00	\$1,040.00
Todd Disher	Service	10/21/2024	Continue to prepare for deposition of fact witness.	4.20	\$1,300.00	\$5,460.00
Alexis Swartz	Service	10/21/2024	Review expert report.	0.20	\$850.00	\$170.00
Jonathan Cohn	Service	10/21/2024	Call w J Stokes re depositions.	0.30	\$1,400.00	\$420.00
Jonathan Cohn	Service	10/21/2024	Review expert depo outline.	0.20	\$1,400.00	\$280.00
Alexis Swartz	Service	10/21/2024	Communicate regarding expert payment.	0.10	\$850.00	\$85.00
Jacob Richards	Service	10/21/2024	Research and summarize cases addressing discovery issue.	2.20	\$850.00	\$1,870.00
Jacob Richards	Service	10/21/2024	Call with A. Swartz re discovery issue research project.	0.20	\$850.00	\$170.00
Jacob Richards	Service	10/21/2024	Attend LKC internal case management call.	0.30	\$850.00	\$255.00
Jacob Richards	Service	10/21/2024	Review correspondence regarding merits issues and deposition prep.	1.40	\$850.00	\$1,190.00
Will Thompson	Service	10/21/2024	Communicate with LKC case team re pending discovery tasks and case strategy.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	10/21/2024	Prepare for deposition.	3.70	\$1,300.00	\$4,810.00
Will Thompson	Service	10/21/2024	Analyze and revise draft response to motion for summary judgment.	0.70	\$1,300.00	\$910.00
Will Thompson	Service	10/21/2024	Assist T. Disher with preparation for deposition.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	10/21/2024	Communicate with T. Disher re trial strategy.	0.30	\$1,300.00	\$390.00
Gabriela Gonzalez-Araiza	Service	10/21/2024	Review background materials for expert deposition.	3.00	\$1,000.00	\$3,000.00
Gabriela Gonzalez-Araiza	Service	10/21/2024	Draft deposition outline for mock expert	0.80	\$1,000.00	\$800.00

deposition.						
Gabriela Gonzalez-Araiza	Service	10/21/2024	Confer with co-counsel and expert to perform mock deposition and review performance.	1.40	\$1,000.00	\$1,400.00
Andrew Davis	Service	10/21/2024	Prepare for deposition.	1.00	\$1,300.00	\$1,300.00
Andrew Davis	Service	10/21/2024	Review and comment on expert rebuttals.	1.40	\$1,300.00	\$1,820.00
Andrew Davis	Service	10/21/2024	Revise response to Whinstone motion for summary judgment.	6.50	\$1,300.00	\$8,450.00
Andrew Davis	Service	10/21/2024	Communicate internally re case updates and strategy.	0.30	\$1,300.00	\$390.00
Alexis Swartz	Service	10/22/2024	Review rebuttal expert reports.	0.60	\$850.00	\$510.00
Mark Rothrock	Service	10/22/2024	Conduct deposition preparation for expert depositions.	0.70	\$850.00	\$595.00
Alexis Swartz	Service	10/22/2024	Communicate regarding rebuttal expert reports.	0.20	\$850.00	\$170.00
Jonathan Cohn	Service	10/22/2024	Revise opposition to MSJ.	2.70	\$1,400.00	\$3,780.00
Mark Rothrock	Service	10/22/2024	Strategize with W. Thompson and J. Richards; locate and review protective order; review deposition exhibits for confidential and highly confidential information; review deposition transcript for confidential and highly confidential information; create page/line number log of proposed designations	8.20	\$850.00	\$6,970.00
Jonathan Cohn	Service	10/22/2024	Client call.	0.60	\$1,400.00	\$840.00
Jonathan Cohn	Service	10/22/2024	Deposition prep.	3.00	\$1,400.00	\$4,200.00
Jonathan Cohn	Service	10/22/2024	Calls with W. Thompson re profit share payments.	0.50	\$1,400.00	\$700.00
Todd Disher	Service	10/22/2024	Prepare for and depose H. Davidson.	6.70	\$1,300.00	\$8,710.00

Alexis Swartz	Service	10/22/2024	Communicate internally regarding depositions and discovery.	0.40	\$850.00	\$340.00
Jacob Richards	Service	10/22/2024	Communicate internally re deposition transcript confidentiality designations.	0.40	\$850.00	\$340.00
Jacob Richards	Service	10/22/2024	Review deposition transcript and protective order; propose confidentiality designations.	4.30	\$850.00	\$3,655.00
Matthew Frederick	Service	10/22/2024	Attend deposition of Kevin Haugen.	9.20	\$1,300.00	\$11,960.00
Matthew Frederick	Service	10/22/2024	Communicate with Andrew Davis about Haugen deposition.	0.40	\$1,300.00	\$520.00
Matthew Frederick	Service	10/22/2024	Communicate with Will Thompson about Haugen deposition.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	10/22/2024	Communicate with J. Richards and M. Rothrock re deposition confidentiality designations.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	10/22/2024	Analyze profit share payments and prepare witnesses for depositions on that topic.	4.90	\$1,300.00	\$6,370.00
Will Thompson	Service	10/22/2024	Prepare for deposition.	2.70	\$1,300.00	\$3,510.00
Will Thompson	Service	10/22/2024	Analyze and revise draft response to motion for summary judgment.	1.90	\$1,300.00	\$2,470.00
Andrew Davis	Service	10/22/2024	Attend Haugen deposition.	9.20	\$1,300.00	\$11,960.00
Andrew Davis	Service	10/22/2024	Communicate with M. Frederick re deposition.	0.20	\$1,300.00	\$260.00
Jonathan Cohn	Service	10/23/2024	Revise MSJ Opposition.	0.70	\$1,400.00	\$980.00
Alexis Swartz	Service	10/23/2024	Communicate internally regarding case management and depositions.	0.80	\$850.00	\$680.00
Alexis Swartz	Service	10/23/2024	Attend in firm meeting to discuss case	0.80	\$850.00	\$680.00



			management and depositions.			
Mark Rothrock	Service	10/23/2024	Rhodium LKC team strategy call.	0.70	\$850.00	\$595.00
Mark Rothrock	Service	10/23/2024	Deposition preparation.	7.00	\$850.00	\$5,950.00
Alexis Swartz	Service	10/23/2024	Prepare for Rhodium expert deposition.	0.30	\$850.00	\$255.00
Matthew Frederick	Service	10/23/2024	Communicate with LKC attorneys about depositions and case strategy.	0.70	\$1,300.00	\$910.00
Jonathan Cohn	Service	10/23/2024	Daily LKC call on updates and strategy.	0.70	\$1,400.00	\$980.00
Jonathan Cohn	Service	10/23/2024	Review Whinstone expert reply report.	0.20	\$1,400.00	\$280.00
Alexis Swartz	Service	10/23/2024	Discuss deposition outline.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	10/23/2024	Prepare deposition modules and documents.	3.20	\$850.00	\$2,720.00
Alexis Swartz	Service	10/23/2024	Review Whinstone production.	0.80	\$850.00	\$680.00
Jonathan Cohn	Service	10/23/2024	Call with B. Asay and P. Brody re discovery motions.	0.30	\$1,400.00	\$420.00
Matthew Frederick	Service	10/23/2024	Draft inserts for deposition outline.	7.80	\$1,300.00	\$10,140.00
Alexis Swartz	Service	10/23/2024	Prepare for and lead meeting with expert on rebuttal reports.	1.50	\$850.00	\$1,275.00
Michele Somboon	Service	10/23/2024	Communicate with M. Rothrock re: transcript confidentiality designations and correspondence to opposing counsel.	0.20	\$500.00	\$100.00
Michele Somboon	Service	10/23/2024	Prepare correspondence to opposing counsel re: transcript confidentiality designations and send to M. Rothrock and A. Swartz for review.	0.30	\$500.00	\$150.00
Jonathan Cohn	Service	10/23/2024	Call with J. Stokes re expert depo.	0.30	\$1,400.00	\$420.00

Alexis Swartz	Service	10/23/2024	Draft modules for depo outline.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	10/23/2024	Review credit facility documents.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	10/23/2024	Discuss documents with W. Thompson.	0.10	\$850.00	\$85.00
Matthew Frederick	Service	10/23/2024	Communicate with L. Brannen, P. Brody, and W. Thompson about documents for use in depositions.	0.40	\$1,300.00	\$520.00
Matthew Frederick	Service	10/23/2024	Communicate with Mark Rothrock about documents for McGonegal deposition.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	10/23/2024	Communicate with client.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	10/23/2024	Communicate with J. Stokes re case strategy.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	10/23/2024	Prepare for fact witness deposition.	10.50	\$1,300.00	\$13,650.00
Will Thompson	Service	10/23/2024	Communicate with LKC case team re pending discovery tasks and case strategy.	0.70	\$1,300.00	\$910.00
Will Thompson	Service	10/23/2024	Prepare for Whinstone expert deposition.	0.20	\$1,300.00	\$260.00
Jonathan Cohn	Expense	10/23/2024	E115 Deposition transcripts: Payment of transcript for deposition of Chad Harris.	1.00	\$4,277.15	\$4,277.15
Todd Disher	Service	10/23/2024	Prepare for corporate representative deposition.	4.20	\$1,300.00	\$5,460.00
Todd Disher	Service	10/23/2024	Discuss issues with expert.	0.70	\$1,300.00	\$910.00
Andrew Davis	Service	10/23/2024	Communicate internally re case updates and strategy.	0.70	\$1,300.00	\$910.00
Jacob Richards	Service	10/23/2024	Attend LKC internal case management meeting.	0.70	\$850.00	\$595.00
Jacob Richards	Service	10/23/2024	Review Whinstone emergency motion and related correspondence	0.60	\$850.00	\$510.00

			from co-counsel.			
Jacob Richards	Service	10/23/2024	Review Whinstone document production; follow up with LKC team re hot docs for depositions.	2.80	\$850.00	\$2,380.00
Jacob Richards	Service	10/23/2024	Draft section of emergency motion opposition re discovery dispute.	2.60	\$850.00	\$2,210.00
Jacob Richards	Service	10/23/2024	Communicate with LKC team re confidentiality designations.	0.60	\$850.00	\$510.00
Matthew Frederick	Service	10/24/2024	Draft inserts for fact witness deposition outline.	8.30	\$1,300.00	\$10,790.00
Mark Rothrock	Service	10/24/2024	Deposition preparation.	8.40	\$850.00	\$7,140.00
Jonathan Cohn	Service	10/24/2024	Review discovery motions.	0.80	\$1,400.00	\$1,120.00
Jonathan Cohn	Service	10/24/2024	Review loan docs; correspondence re same.	0.60	\$1,400.00	\$840.00
Matthew Frederick	Service	10/24/2024	Communicate with LKC attorneys about pending projects and case strategy.	0.60	\$1,300.00	\$780.00
Mark Rothrock	Service	10/24/2024	LKC internal strategy call.	0.70	\$850.00	\$595.00
Jonathan Cohn	Service	10/24/2024	Client update call.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	10/24/2024	Expert depo prep.	1.50	\$1,400.00	\$2,100.00
Alexis Swartz	Service	10/24/2024	Prepare for and attend Schatz deposition.	8.50	\$850.00	\$7,225.00
Alexis Swartz	Service	10/24/2024	Communicate internally and with co counsel regarding depositions and discovery issues.	0.50	\$850.00	\$425.00
Todd Disher	Service	10/24/2024	Prepare for and conduct deposition of D. Schatz.	9.20	\$1,300.00	\$11,960.00
Jonathan Cohn	Service	10/24/2024	Call with client.	0.30	\$1,400.00	\$420.00
Jonathan Cohn	Service	10/24/2024	Fact depo prep.	0.50	\$1,400.00	\$700.00
Andrew Davis	Service	10/24/2024	Communicate internally	0.60	\$1,300.00	\$780.00

			re case updates and strategy.			
Andrew Davis	Service	10/24/2024	Communicate with W. Thompson re strategy.	0.10	\$1,300.00	\$130.00
Andrew Davis	Service	10/24/2024	Review correspondence re deposition, expert, and other case strategy.	0.50	\$1,300.00	\$650.00
Gabriela Gonzalez-Araiza	Service	10/24/2024	Research caselaw on exclusion of expert testimony for failure to comply with Rule 26(a) disclosures.	1.00	\$1,000.00	\$1,000.00
Gabriela Gonzalez-Araiza	Service	10/24/2024	Research caselaw on exclusion of expert testimony under FRE 702.	0.90	\$1,000.00	\$900.00
Jacob Richards	Service	10/24/2024	Review draft response to Whinstone emergency motion & co-counsel feedback.	0.40	\$850.00	\$340.00
Jacob Richards	Service	10/24/2024	Review correspondence from co-counsel re depositions and expert reports.	0.60	\$850.00	\$510.00
Jacob Richards	Service	10/24/2024	Meet internally with LKC team re case management and strategy.	0.60	\$850.00	\$510.00
Jacob Richards	Service	10/24/2024	Search Whinstone productions for rebuttal material for deposition testimony.	0.50	\$850.00	\$425.00
Will Thompson	Service	10/24/2024	Prepare for deposition of Whinstone fact and corporate representative witness.	4.30	\$1,300.00	\$5,590.00
Will Thompson	Service	10/24/2024	Communicate with LKC case team re pending discovery tasks and case strategy.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	10/24/2024	Analyze issues for preparation of Rhodium fact and corporate representative witnesses.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	10/24/2024	Analyze Daubert issue and coordinate	0.60	\$1,300.00	\$780.00

			preparation of Daubert motion.			
Will Thompson	Service	10/24/2024	Analyze Whinstone's expert reports to prepare for depositions.	2.80	\$1,300.00	\$3,640.00
Mark Rothrock	Service	10/25/2024	Prepare documents for expert deposition; conduct related research; review and analyze key documents	8.60	\$850.00	\$7,310.00
Matthew Frederick	Service	10/25/2024	Attend McGonegal deposition.	8.40	\$1,300.00	\$10,920.00
Alexis Swartz	Service	10/25/2024	Prepare for expert deposition.	2.60	\$850.00	\$2,210.00
Alexis Swartz	Service	10/25/2024	Communicate with expert and client.	0.70	\$850.00	\$595.00
Alexis Swartz	Expense	10/25/2024	E101 Copying: FedEx copy charges.	1.00	\$162.40	\$162.40
Alexis Swartz	Service	10/25/2024	Prepare for and attend depo prep session.	1.70	\$850.00	\$1,445.00
Jonathan Cohn	Service	10/25/2024	Depo prep; hearing; calls re hearing; Alex P depo.	5.30	\$1,400.00	\$7,420.00
Jonathan Cohn	Service	10/25/2024	LKC calls re depositions.	0.50	\$1,400.00	\$700.00
Andrew Davis	Service	10/25/2024	Research and draft motion to exclude expert testimony.	5.10	\$1,300.00	\$6,630.00
Todd Disher	Service	10/25/2024	Prepare for upcoming depositions and discuss same with W. Thompson.	1.20	\$1,300.00	\$1,560.00
Gabriela Gonzalez-Araiza	Service	10/25/2024	Continue researching caselaw on exclusion of expert testimony for failure to comply with Rule 26(a) disclosures.	5.00	\$1,000.00	\$5,000.00
Gabriela Gonzalez-Araiza	Service	10/25/2024	Draft motion to exclude expert testimony.	1.00	\$1,000.00	\$1,000.00
Andrew Davis	Service	10/25/2024	Review and analyze rebuttal reports.	0.60	\$1,300.00	\$780.00
Jacob Richards	Service	10/25/2024	Review email and supporting authorities sent by opposing counsel re hearing.	0.60	\$850.00	\$510.00

Jacob Richards	Service	10/25/2024	Perform research in support of deposition teams.	0.40	\$850.00	\$340.00
Jacob Richards	Service	10/25/2024	Communicate internally re case administration.	0.30	\$850.00	\$255.00
Will Thompson	Service	10/25/2024	Prepare for deposition of Whinstone fact and corporate representative witness.	0.70	\$1,300.00	\$910.00
Will Thompson	Service	10/25/2024	Attend and take deposition of Whinstone fact and corporate representative witness.	8.40	\$1,300.00	\$10,920.00
Will Thompson	Service	10/25/2024	Analyze next steps in light of deposition of Whinstone fact and corporate representative witness.	1.20	\$1,300.00	\$1,560.00
Matthew Frederick	Service	10/26/2024	Draft deposition outline questions.	1.40	\$1,300.00	\$1,820.00
Andrew Davis	Service	10/26/2024	Review expert report and provides analysis of same to W. Thompson.	0.80	\$1,300.00	\$1,040.00
Will Thompson	Service	10/26/2024	Prepare for deposition of Whinstone expert witness.	2.90	\$1,300.00	\$3,770.00
Alexis Swartz	Service	10/27/2024	Prepare for Rhodium expert deposition.	3.60	\$850.00	\$3,060.00
Jonathan Cohn	Service	10/27/2024	Call with J. Stokes re strategy.	0.20	\$1,400.00	\$280.00
Jonathan Cohn	Service	10/27/2024	Review depo transcript and Whinstone discovery brief.	0.80	\$1,400.00	\$1,120.00
Jonathan Cohn	Service	10/27/2024	Travel to Houston for depo and prep.	1.30	\$700.00	\$910.00
Will Thompson	Service	10/27/2024	Prepare for deposition of Whinstone expert witness.	4.80	\$1,300.00	\$6,240.00
Will Thompson	Service	10/27/2024	Assist with preparation of Rhodium fact witness for deposition.	1.10	\$1,300.00	\$1,430.00
Will Thompson	Service	10/27/2024	Analyze case strategy in light of communications with opposing counsel.	0.30	\$1,300.00	\$390.00

Loretta Howard	Expense	10/27/2024	E110 Out-of-town travel: Bus travel to and from Houston for W. Thompson re Burnett deposition.	1.00	\$290.00	\$290.00
Loretta Howard	Expense	10/27/2024	E110 Out-of-town travel: Uber to Austin bus terminal for W. Thompson before Burnett deposition.	1.00	\$31.11	\$31.11
Loretta Howard	Expense	10/27/2024	E110 Out-of-town travel: Uber charges for A. Swartz re deposition.	1.00	\$40.96	\$40.96
Alexis Swartz	Service	10/28/2024	Prepare for Rhodium expert deposition.	9.70	\$850.00	\$8,245.00
Mark Rothrock	Service	10/28/2024	Review and analyze emails produced by Whinstone.	2.40	\$850.00	\$2,040.00
Mark Rothrock	Service	10/28/2024	Review and analyze Whinstone production.	3.20	\$850.00	\$2,720.00
Alexis Swartz	Service	10/28/2024	Communicate internally and with co counsel regarding discovery and expert depositions.	0.50	\$850.00	\$425.00
Matthew Frederick	Service	10/28/2024	Communicate with LKC attorneys about discovery issues.	0.20	\$1,300.00	\$260.00
Matthew Frederick	Service	10/28/2024	Communicate with other outside counsel about pending issues and case strategy.	0.20	\$1,300.00	\$260.00
Jonathan Cohn	Service	10/28/2024	Expert depo prep.	5.00	\$1,400.00	\$7,000.00
Todd Disher	Service	10/28/2024	Analyze documents produced by Whinstone's expert related to dry coolers.	0.90	\$1,300.00	\$1,170.00
Andrew Davis	Service	10/28/2024	Attend witness deposition prep.	2.20	\$1,300.00	\$2,860.00
Andrew Davis	Service	10/28/2024	Communicate with P. Brody and W. Thompson re witness prep.	1.80	\$1,300.00	\$2,340.00
Jacob Richards	Service	10/28/2024	Review communications from bankruptcy counsel re trial schedule meet and confer and summary	0.50	\$850.00	\$425.00

of hearing on scheduling.						
Jacob Richards	Service	10/28/2024	Communicate internally re case administration.	0.20	\$850.00	\$170.00
Will Thompson	Service	10/28/2024	Prepare for deposition of Whinstone expert witness.	3.60	\$1,300.00	\$4,680.00
Will Thompson	Service	10/28/2024	Attend and take deposition of Whinstone expert witness.	6.50	\$1,300.00	\$8,450.00
Will Thompson	Service	10/28/2024	Analyze issues re Rhodium expert testimony to prepare for deposition of Rhodium expert witness.	1.10	\$1,300.00	\$1,430.00
Will Thompson	Service	10/28/2024	Communicate with A. Swartz re preparation of Rhodium expert for deposition.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	10/28/2024	Communicate with J. Stokes re strategy for deposition of Rhodium fact witness.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	10/28/2024	Travel back from Houston to Austin after deposition of Whinstone expert.	2.70	\$650.00	\$1,755.00
Loretta Howard	Expense	10/28/2024	E110 Out-of-town travel: Uber from Austin bus terminal for W. Thompson after Burnett deposition.	1.00	\$34.94	\$34.94
Loretta Howard	Expense	10/28/2024	E110 Out-of-town travel: Parking for W. Thompson for McGonegal deposition.	1.00	\$13.00	\$13.00
Loretta Howard	Expense	10/28/2024	E110 Out-of-town travel: Uber for A. Swartz re deposition.	1.00	\$11.90	\$11.90
Mark Rothrock	Service	10/29/2024	Review and analyze produced texts and emails for discussion of agreements between Rhodium and Whinstone.	2.80	\$850.00	\$2,380.00
Matthew Frederick	Service	10/29/2024	Review transcript of remand hearing in N.D. Tex.	0.90	\$1,300.00	\$1,170.00



Matthew Frederick	Service	10/29/2024	Communicate with LKC attorneys about depositions and case strategy.	0.50	\$1,300.00	\$650.00
Mark Rothrock	Service	10/29/2024	LKC internal strategy call.	0.60	\$850.00	\$510.00
Jonathan Cohn	Service	10/29/2024	LKC call on updates and strategy.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	10/29/2024	Review transcript on removal hearing.	0.50	\$1,400.00	\$700.00
Matthew Frederick	Service	10/29/2024	Draft cross outlines.	3.80	\$1,300.00	\$4,940.00
Andrew Davis	Service	10/29/2024	Communicate internally re damages issues.	0.70	\$1,300.00	\$910.00
Jacob Richards	Service	10/29/2024	Attend internal LKC call re case strategy and deposition updates.	0.50	\$850.00	\$425.00
Mark Rothrock	Service	10/29/2024	Research accounting damages experts.	3.60	\$850.00	\$3,060.00
Jonathan Cohn	Service	10/29/2024	Expert depo prep.	2.00	\$1,400.00	\$2,800.00
Alexis Swartz	Service	10/29/2024	Prepare for expert deposition.	8.50	\$850.00	\$7,225.00
Will Thompson	Service	10/29/2024	Assist with preparation of Rhodium expert witness for deposition.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	10/29/2024	Communicate with LKC case team re pending discovery tasks and case strategy.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	10/29/2024	Prepare for cross-examination of Whinstone witness at trial.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	10/29/2024	Analyze trial strategy re Whinstone's profit-share theory.	3.10	\$1,300.00	\$4,030.00
Will Thompson	Service	10/29/2024	Communicate with client and co-counsel re case strategy and coordination across firms.	0.90	\$1,300.00	\$1,170.00
Gabriela Gonzalez-Araiza	Service	10/29/2024	Continue researching caselaw on exclusion of expert testimony for failure to comply with	1.60	\$1,000.00	\$1,600.00

Rule 26(a) disclosures.						
Gabriela Gonzalez-Araiza	Service	10/29/2024	Revise draft motion to exclude expert testimony per partner comments.	0.90	\$1,000.00	\$900.00
Todd Disher	Service	10/29/2024	Discuss next strategic steps with LKC legal team.	0.40	\$1,300.00	\$520.00
Loretta Howard	Expense	10/29/2024	E110 Out-of-town travel: Hotel expense for W. Thompson re Burnett deposition.	1.00	\$373.23	\$373.23
Andrew Davis	Service	10/29/2024	Attend deposition of T. Lewis.	0.30	\$1,300.00	\$390.00
Andrew Davis	Service	10/29/2024	Communicate with M. Rothrock re experts.	0.50	\$1,300.00	\$650.00
Andrew Davis	Service	10/29/2024	Communicate internally re case updates and strategy.	0.50	\$1,300.00	\$650.00
Mark Rothrock	Service	10/30/2024	Conduct research related to experts; review deposition transcripts to prepare cross-examination outline.	8.70	\$850.00	\$7,395.00
Matthew Frederick	Service	10/30/2024	Communicate with LKC attorneys about pending projects and case strategy.	0.30	\$1,300.00	\$390.00
Matthew Frederick	Service	10/30/2024	Draft cross outlines.	3.50	\$1,300.00	\$4,550.00
Alexis Swartz	Service	10/30/2024	Prepare for and defend Miljkovic Deposition.	9.50	\$850.00	\$8,075.00
Todd Disher	Service	10/30/2024	Analyze next strategic steps with LKC legal team.	0.40	\$1,300.00	\$520.00
Todd Disher	Service	10/30/2024	Begin to prepare for cross examination of fact witness.	2.80	\$1,300.00	\$3,640.00
Todd Disher	Service	10/30/2024	Begin to prepare for cross examination of expert witness.	1.20	\$1,300.00	\$1,560.00
Jacob Richards	Service	10/30/2024	Attend internal strategy call.	0.40	\$850.00	\$340.00
Jonathan Cohn	Service	10/30/2024	Expert depo and debrief/strategy calls.	9.00	\$1,400.00	\$12,600.00

Jonathan Cohn	Service	10/30/2024	Travel.	3.00	\$700.00	\$2,100.00
Jonathan Cohn	Service	10/30/2024	Review Whinstone's reply re MSJ.	0.40	\$1,400.00	\$560.00
Andrew Davis	Service	10/30/2024	Communicate internally re case updates and strategy.	0.40	\$1,300.00	\$520.00
Andrew Davis	Service	10/30/2024	Analyze damages issues.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	10/30/2024	Communicate with LKC case team re trial preparation and case strategy.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	10/30/2024	Prepare for cross-examinations of Whinstone witnesses.	1.30	\$1,300.00	\$1,690.00
Will Thompson	Service	10/30/2024	Prepare for Whinstone cross-examination of Rhodium witnesses and analyze related issues.	3.90	\$1,300.00	\$5,070.00
Will Thompson	Service	10/30/2024	Communicate with J. Cohn re trial strategy in light of depositions.	0.40	\$1,300.00	\$520.00
Mark Rothrock	Service	10/31/2024	Draft cross-exam outline for trial.	10.00	\$850.00	\$8,500.00
Loretta Howard	Expense	10/31/2024	E110 Out-of-town travel: Uber for A. Swartz re deposition.	1.00	\$46.75	\$46.75
Todd Disher	Service	10/31/2024	Discuss upcoming tasks with LKC legal team.	0.50	\$1,300.00	\$650.00
Todd Disher	Service	10/31/2024	Prepare for cross examination of Whinstone's expert witness.	1.10	\$1,300.00	\$1,430.00
Todd Disher	Service	10/31/2024	Discuss upcoming trial with J. Cohn and W. Thompson.	0.60	\$1,300.00	\$780.00
Matthew Frederick	Service	10/31/2024	Communicate with Mark Rothrock about cross outlines.	0.30	\$1,300.00	\$390.00
Matthew Frederick	Service	10/31/2024	Communicate with LKC attorneys about pending projects and trial preparation.	0.40	\$1,300.00	\$520.00

Matthew Frederick	Service	10/31/2024	Draft cross outlines.	4.70	\$1,300.00	\$6,110.00
Matthew Frederick	Service	10/31/2024	Review summary judgment briefs.	1.10	\$1,300.00	\$1,430.00
Jonathan Cohn	Service	10/31/2024	LKC call re next steps.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	10/31/2024	Review opposition SMJ.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	10/31/2024	Call with T. Disher and W. Thompson re trial and strategy.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	10/31/2024	Client call.	1.00	\$1,400.00	\$1,400.00
Alexis Swartz	Service	10/31/2024	Review Rhodium witness testimony.	1.60	\$850.00	\$1,360.00
Alexis Swartz	Service	10/31/2024	Communicate internally and with co-counsel regarding discovery and depositions.	0.60	\$850.00	\$510.00
Loretta Howard	Expense	10/31/2024	E110 Out-of-town travel: Hotel for A. Swartz re deposition.	1.00	\$2,282.51	\$2,282.51
Loretta Howard	Expense	10/31/2024	E110 Out-of-town travel: Airfare for A. Swartz re deposition.	1.00	\$618.96	\$618.96
Alexis Swartz	Service	10/31/2024	Review and organize deposition exhibits.	0.30	\$850.00	\$255.00
Matthew Frederick	Service	10/31/2024	Communicate with A. Davis about pretrial motions.	0.20	\$1,300.00	\$260.00
Andrew Davis	Service	10/31/2024	Communicate with Stris, internal team, and client.	0.70	\$1,300.00	\$910.00
Andrew Davis	Service	10/31/2024	Communicate with W. Thompson and M. Frederick re written motions.	0.80	\$1,300.00	\$1,040.00
Andrew Davis	Service	10/31/2024	Analyze damages issues.	0.70	\$1,300.00	\$910.00
Andrew Davis	Service	10/31/2024	Revise written motion and circulate to Stris.	0.30	\$1,300.00	\$390.00
Andrew Davis	Service	10/31/2024	Research for written motions.	0.40	\$1,300.00	\$520.00
Jacob Richards	Service	10/31/2024	Attend internal LKC strategy call.	0.70	\$850.00	\$595.00

Jacob Richards	Service	10/31/2024	Review offensive deposition transcripts for confidentiality designations; prepare letters to opposing counsel re same.	7.90	\$850.00	\$6,715.00
Jacob Richards	Service	10/31/2024	Communicate with LKC and Stris teams re deposition confidentiality designations.	1.10	\$850.00	\$935.00
Will Thompson	Service	10/31/2024	Communicate with LKC case team re trial preparation and case strategy.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	10/31/2024	Prepare strategy for cross-examinations of Whinstone witnesses.	1.40	\$1,300.00	\$1,820.00
Will Thompson	Service	10/31/2024	Analyze expert depositions.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	10/31/2024	Analyze strategic options for dispositive motion briefing and motions in limine.	3.10	\$1,300.00	\$4,030.00

Time Keeper	Quantity	Rate	Total
Jonathan Cohn	100.8	\$1,400.00	\$141,120.00
Jonathan Cohn	4.3	\$700.00	\$3,010.00
Andrew Davis	123.4	\$1,300.00	\$160,420.00
Andrew Davis	3.4	\$650.00	\$2,210.00
Todd Disher	65.8	\$1,300.00	\$85,540.00
Matthew Frederick	171.4	\$1,300.00	\$222,820.00
Matthew Frederick	2.5	\$650.00	\$1,625.00
Gabriela Gonzalez-Araiza	15.9	\$1,000.00	\$15,900.00
Jacob Richards	34.3	\$850.00	\$29,155.00
Mark Rothrock	104.3	\$850.00	\$88,655.00
Michele Somboon	9.9	\$500.00	\$4,950.00
Alexis Swartz	194.7	\$850.00	\$165,495.00
Will Thompson	170.9	\$1,300.00	\$222,170.00

Will Thompson	2.7	\$650.00	\$1,755.00
<b>Subtotal</b>			<b>\$1,153,007.91</b>
<b>Invoice Discount</b>			<b>\$305,947.50</b>
<i>20% discount (\$50,000) off of first \$250k in services. 25% discount (\$62,500) for next \$250k in services. 30% discount (\$193,447.50) for remainder of services.</i>			
<b>Total</b>			<b>\$847,060.41</b>

## Detailed Statement of Account

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1327	12/05/2024	\$847,060.41	\$0.00	\$847,060.41
<b>Outstanding Balance</b>				<b>\$847,060.41</b>
<b>Total Amount Outstanding</b>				<b>\$847,060.41</b>

Please make all amounts payable to: Lehotsky Keller Cohn LLP

Please pay within 30 days.

## Remittance Advice

### Checking Information

**Remit checks to:** LEHOTSKY KELLER COHN LLP  
200 Massachusetts Avenue, NW Suite 700  
Washington DC 20001

### Wire Transfer Information

**Bank Name/Address:** Receiving bank: Chain Bridge Bank, N.A., McLean, VA

**Bank ABA/Routing #:** [REDACTED]

**Name/Account #:** Lehotsky Keller Cohn Operating Account  
LEHOTSKY KELLER COHN LLP  
Account number: [REDACTED]

Please include the invoice number 1327 as an additional reference so we may accurately identify and apply your payment.

Please provide adequate payment to cover the wire fees assessed by your financial institution.

# Lehotsky Keller Cohn LLP

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**  
Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**  
200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

## INVOICE

Invoice # 1328  
Date: 11/05/2024  
Due On: 12/05/2024

Invoice Number	Total
1328	\$8,571.50
Subtotal	\$12,245.00
Tax	\$0.00
<b>Amount Due</b>	<b>\$8,571.50</b>



**Lehotsky Keller Cohn LLP****INVOICE**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

Invoice # 1328  
Date: 11/05/2024  
Due On: 12/05/2024

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**00776-Rhodium 30MW LLC****Bankruptcy Fee Application Time**

Attorney	Type	Date	Notes	Quantity	Rate	Total
Jacob Richards	Service	10/21/2024	Communicate internally re bankruptcy fee application.	0.20	\$850.00	\$170.00
Will Thompson	Service	10/21/2024	Coordinate preparation of fee application by J. Richards.	0.20	\$1,300.00	\$260.00
Jacob Richards	Service	10/22/2024	Review fee application emails from co-counsel.	0.40	\$850.00	\$340.00
Jacob Richards	Service	10/22/2024	Communicate internally regarding fee application.	0.40	\$850.00	\$340.00
Jacob Richards	Service	10/22/2024	Communicate with Stris team re fee application process and requirements.	0.70	\$850.00	\$595.00
Jacob Richards	Service	10/23/2024	Review applicable guidance for fee application, revise draft of application shell.	1.70	\$850.00	\$1,445.00
Jacob Richards	Service	10/23/2024	Communicate internally re fee application draft.	0.40	\$850.00	\$340.00
Jacob Richards	Service	10/24/2024	Revise fee application shell.	0.80	\$850.00	\$680.00
Jacob Richards	Service	10/29/2024	Work on fee application.	1.10	\$850.00	\$935.00
Jacob Richards	Service	10/30/2024	Revise Aug-Sept Fee application.	3.30	\$850.00	\$2,805.00
Jacob Richards	Service	10/30/2024	Review invoice entries for proposed privilege redactions.	2.40	\$850.00	\$2,040.00
Jacob Richards	Service	10/30/2024	Communicate internally re fee application.	0.90	\$850.00	\$765.00
Jacob Richards	Service	10/31/2024	Communicate internally re fee application.	1.10	\$850.00	\$935.00
Jacob Richards	Service	10/31/2024	Revise August/September fee	0.70	\$850.00	\$595.00

application.

Time Keeper	Quantity	Rate	Total
Jacob Richards	14.1	\$850.00	\$11,985.00
Will Thompson	0.2	\$1,300.00	\$260.00
<b>Subtotal</b>			<b>\$12,245.00</b>
<b>Invoice Discount</b>			<b>30.0%</b>
<i>\$3,673.50 discount - 30% hourly services</i>			
<b>Total</b>			<b>\$8,571.50</b>

## Detailed Statement of Account

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1328	12/05/2024	\$8,571.50	\$0.00	\$8,571.50
<b>Outstanding Balance</b>				<b>\$8,571.50</b>
<b>Total Amount Outstanding</b>				<b>\$8,571.50</b>

Please make all amounts payable to: Lehotsky Keller Cohn LLP

Please pay within 30 days.

## Remittance Advice

### Checking Information

**Remit checks to:** LEHOTSKY KELLER COHN LLP  
200 Massachusetts Avenue, NW Suite 700  
Washington DC 20001

### Wire Transfer Information

**Bank Name/Address:** Receiving bank: Chain Bridge Bank, N.A., McLean, VA

**Bank ABA/Routing #:** [REDACTED]

**Name/Account #:** Lehotsky Keller Cohn Operating Account  
LEHOTSKY KELLER COHN LLP  
Account number: [REDACTED]

Please include the invoice number 1328 as an additional reference so we may accurately identify and apply your payment.

Please provide adequate payment to cover the wire fees assessed by your financial institution.

# Lehotsky Keller Cohn LLP

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**  
Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**  
200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

## INVOICE

Invoice # 1400  
Date: 12/04/2024  
Due On: 01/03/2025

Invoice Number	Total
1400	\$737,196.93
Subtotal	\$983,585.43
Tax	\$0.00
<b>Amount Due</b>	<b>\$737,196.93</b>

**Lehotsky Keller Cohn LLP****INVOICE**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

Invoice # 1400  
Date: 12/04/2024  
Due On: 01/03/2025

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**00366-Rhodium 30MW LLC****Whinstone Litigation**

Attorney	Type	Date	Notes	Quantity	Rate	Total
Loretta Howard	Expense	10/30/2024	E110 Out-of-town travel: Lyft charge for J. Cohn re travel to Houston.	1.00	\$7.96	\$7.96
Loretta Howard	Expense	10/30/2024	E110 Out-of-town travel: Lyft charges for J. Cohn re travel to Houston.	1.00	\$30.00	\$30.00
Loretta Howard	Expense	10/30/2024	E110 Out-of-town travel: Lyft charges for J. Cohn re travel to Houston.	1.00	\$57.59	\$57.59
Loretta Howard	Expense	10/30/2024	E110 Out-of-town travel: Lyft expense for J. Cohn re travel to Houston.	1.00	\$203.16	\$203.16
Loretta Howard	Expense	10/30/2024	E110 Out-of-town travel: Lancaster Hotel conference room charges re travel to Houston.	1.00	\$1,785.99	\$1,785.99
Loretta Howard	Expense	10/30/2024	E110 Out-of-town travel: Wi-Fi charges for J. Cohn re travel to Houston.	1.00	\$8.00	\$8.00
Loretta Howard	Expense	10/30/2024	E107 Delivery services/ messengers: Lafayette Parish Sheriff Invoice 119507, personal service on L. Theriot.	1.00	\$32.55	\$32.55
Loretta Howard	Expense	10/30/2024	E107 Delivery services/ messengers: Lafayette Parish Sheriff Invoice 119522, Notary Fee service on L. Theriot.	1.00	\$15.00	\$15.00
Loretta Howard	Expense	10/31/2024	E110 Out-of-town travel: Hotel expense for J. Cohn re travel to Houston.	1.00	\$791.18	\$791.18

Loretta Howard	Expense	10/31/2024	E110 Out-of-town travel: Airfare to Houston for J. Cohn.	1.00	\$1,756.95	\$1,756.95
Todd Disher	Expense	10/31/2024	E102 Outside printing: Rainmaker Document Technologies (INV2321311) Deposition exhibit printing	1.00	\$3,321.55	\$3,321.55
Matthew Frederick	Service	11/01/2024	Review confidentiality designations for Haugen deposition.	0.20	\$1,300.00	\$260.00
Alexis Swartz	Service	11/01/2024	Communicate internally and with co-counsel regarding trial planning, discovery, and depositions.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	11/01/2024	Review protective order and communicate internally regarding expert signing.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	11/01/2024	Prepare for and attend in firm meeting to discuss trial planing and case management.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	11/01/2024	Discuss Burnett MIL with M. Frederick.	0.10	\$850.00	\$85.00
Alexis Swartz	Service	11/01/2024	Draft Burnett motion in limine.	4.60	\$850.00	\$3,910.00
Matthew Frederick	Service	11/01/2024	Communicate with Alexis Swartz about pretrial motions.	0.20	\$1,300.00	\$260.00
Matthew Frederick	Service	11/01/2024	Communicate with LKC attorneys about current projects and case strategy.	0.30	\$1,300.00	\$390.00
Michele Somboon	Service	11/01/2024	Separate exhibit compilation into individual exhibit files.	0.50	\$500.00	\$250.00
Matthew Frederick	Service	11/01/2024	Communicate with outside counsel team about pretrial briefing and preparation.	0.20	\$1,300.00	\$260.00
Todd Disher	Service	11/01/2024	Communicate regarding next steps with LKC legal team.	0.30	\$1,300.00	\$390.00
Matthew Frederick	Service	11/01/2024	Draft trial outlines.	4.10	\$1,300.00	\$5,330.00
Alexis Swartz	Service	11/01/2024	Review and organize video and deposition files.	0.40	\$850.00	\$340.00
Matthew Frederick	Service	11/01/2024	Revise pretrial motion.	2.00	\$1,300.00	\$2,600.00
Jonathan Cohn	Service	11/01/2024	Review Depo transcripts.	2.20	\$1,400.00	\$3,080.00
Jonathan Cohn	Service	11/01/2024	Review draft briefs.	1.00	\$1,400.00	\$1,400.00

Jonathan Cohn	Service	11/01/2024	LKC strategy/update call.	0.20	\$1,400.00	\$280.00
Will Thompson	Service	11/01/2024	Communicate with LKC case team re trial preparation and case strategy.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	11/01/2024	Communicate with A. Swartz re trial exhibits and trial preparation.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	11/01/2024	Analyze strategic options for dispositive motion briefing and motions in limine.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	11/01/2024	Develop trial strategy and assign responsibilities for examining witnesses.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	11/01/2024	Analyze and revise motion to exclude Whinstone expert witness.	0.90	\$1,300.00	\$1,170.00
Will Thompson	Service	11/01/2024	Prepare for Burnett cross-examination; analyze exhibits to Burnett deposition.	1.50	\$1,300.00	\$1,950.00
Will Thompson	Service	11/01/2024	Analyze and revise briefing for motion-to-assume proceedings.	1.30	\$1,300.00	\$1,690.00
Mark Rothrock	Service	11/01/2024	Draft cross-examination outline.	8.30	\$850.00	\$7,055.00
Jonathan Cohn	Service	11/01/2024	Call w J Stokes re hearing.	0.20	\$1,400.00	\$280.00
Jonathan Cohn	Service	11/01/2024	LKC call on trial prep.	0.40	\$1,400.00	\$560.00
Jonathan Cohn	Service	11/01/2024	Hearing on MSJs, MILs, Daubert.	3.00	\$1,400.00	\$4,200.00
Jonathan Cohn	Service	11/01/2024	Debrief after hearing.	1.00	\$1,400.00	\$1,400.00
Jonathan Cohn	Service	11/01/2024	Travel to Houston.	2.50	\$700.00	\$1,750.00
Jacob Richards	Service	11/01/2024	Communicate with Stris/LKC teams re confidentiality designations and deposition exhibits.	1.70	\$850.00	\$1,445.00
Jacob Richards	Service	11/01/2024	Strategize with LKC team.	0.30	\$850.00	\$255.00
Jacob Richards	Service	11/01/2024	Draft subpoena; communicate with Stris and LKC teams regarding same.	0.90	\$850.00	\$765.00
Jacob Richards	Service	11/01/2024	Research case law on subpoena power issue.	0.80	\$850.00	\$680.00
Jacob Richards	Service	11/01/2024	Review deposition transcript for confidentiality designations;	4.10	\$850.00	\$3,485.00

			prepare letter to opposing counsel regarding same.			
Andrew Davis	Service	11/01/2024	Communicate internally re case updates and strategy.	0.30	\$1,300.00	\$390.00
Andrew Davis	Service	11/01/2024	Draft and revise written briefing.	6.20	\$1,300.00	\$8,060.00
Loretta Howard	Expense	11/01/2024	E115 Deposition transcripts: Prevail Invoice 3724 deposition of D. Schatz.	1.00	\$5,126.53	\$5,126.53
Alexis Swartz	Service	11/02/2024	Revise Burnett MIL.	0.40	\$850.00	\$340.00
Jonathan Cohn	Service	11/02/2024	Review opposition to assumption and draft reply, and confer w W Thompson and J Stokes.	1.30	\$1,400.00	\$1,820.00
Matthew Frederick	Service	11/02/2024	Communicate with LKC attorneys about pretrial briefing.	0.20	\$1,300.00	\$260.00
Matthew Frederick	Service	11/02/2024	Review trial exhibits.	2.40	\$1,300.00	\$3,120.00
Will Thompson	Service	11/02/2024	Analyze and revise briefing for motion-to-assume proceedings.	6.80	\$1,300.00	\$8,840.00
Will Thompson	Service	11/02/2024	Identify exhibits for trial.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	11/02/2024	Prepare for cross-examination of Whinstone fact witness.	1.40	\$1,300.00	\$1,820.00
Will Thompson	Service	11/02/2024	Prepare for testimony of Rhodium fact and corporate representative witness.	0.30	\$1,300.00	\$390.00
Jacob Richards	Service	11/02/2024	Finalize deposition confidentiality designations letter and communicate internally re service on opposing counsel.	0.40	\$850.00	\$340.00
Andrew Davis	Service	11/02/2024	Draft and revise written briefing.	3.40	\$1,300.00	\$4,420.00
Jonathan Cohn	Service	11/03/2024	Review MIL and assumption reply.	2.00	\$1,400.00	\$2,800.00
Jonathan Cohn	Service	11/03/2024	Review and review reply outline.	0.50	\$1,400.00	\$700.00
Matthew Frederick	Service	11/03/2024	Draft trial outlines.	2.60	\$1,300.00	\$3,380.00
Todd Disher	Service	11/03/2024	Prepare for expert cross examination.	2.10	\$1,300.00	\$2,730.00
Jonathan Cohn	Service	11/03/2024	LKC-Stris call on reply brief.	0.70	\$1,400.00	\$980.00
Jonathan Cohn	Service	11/03/2024	Edit MIL brief.	0.20	\$1,400.00	\$280.00
Alexis Swartz	Service	11/03/2024	Communicate internally and with	0.50	\$850.00	\$425.00



			co-counsel regarding exhibit list and motions in limine.			
Alexis Swartz	Service	11/03/2024	Revise Burnett MIL.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	11/03/2024	Review deposition transcript for confidentiality.	2.10	\$850.00	\$1,785.00
Matthew Frederick	Service	11/03/2024	Review pretrial motions.	0.30	\$1,300.00	\$390.00
Alexis Swartz	Service	11/03/2024	Review Burnett transcript for confidentiality.	0.40	\$850.00	\$340.00
Todd Disher	Service	11/03/2024	Edit motions.	2.20	\$1,300.00	\$2,860.00
Will Thompson	Service	11/03/2024	Analyze and revise briefing for motion-to-assume proceedings.	6.30	\$1,300.00	\$8,190.00
Will Thompson	Service	11/03/2024	Communicate with co-counsel re organization of and strategy for MSJ reply brief.	0.80	\$1,300.00	\$1,040.00
Will Thompson	Service	11/03/2024	Prepare for cross-examinations of Whinstone witnesses at trial.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	11/03/2024	Prepare for pre-trial hearing.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	11/03/2024	Identify deposition quotes for use in briefing in motion-to-assume proceedings.	0.10	\$1,300.00	\$130.00
Mark Rothrock	Service	11/03/2024	Draft cross-examination outline.	4.10	\$850.00	\$3,485.00
Jacob Richards	Service	11/03/2024	Communicate with Stris and LKC teams regarding deposition transcripts and confidentiality designations	1.10	\$850.00	\$935.00
Jacob Richards	Service	11/03/2024	Research Texas case law on contracts issue.	0.90	\$850.00	\$765.00
Andrew Davis	Service	11/03/2024	Draft and revise written briefing.	4.00	\$1,300.00	\$5,200.00
Will Thompson	Service	11/04/2024	Identify deposition quotes for use in briefing in motion-to-assume proceedings.	0.80	\$1,300.00	\$1,040.00
Alexis Swartz	Service	11/04/2024	Revise and finalize MIL drafts.	6.60	\$850.00	\$5,610.00
Mark Rothrock	Service	11/04/2024	Draft cross-examination outlines.	9.10	\$850.00	\$7,735.00
Jonathan Cohn	Service	11/04/2024	Review MIL.	0.20	\$1,400.00	\$280.00
Alexis Swartz	Service	11/04/2024	Attend in firm meeting to discuss case tasks and trial.	0.50	\$850.00	\$425.00
Matthew Frederick	Service	11/04/2024	Communicate with LKC	0.40	\$1,300.00	\$520.00

			attorneys about trial preparation and strategy.			
Matthew Frederick	Service	11/04/2024	Draft trial outlines.	6.40	\$1,300.00	\$8,320.00
Alexis Swartz	Service	11/04/2024	Review Burnett transcript for confidentiality.	1.50	\$850.00	\$1,275.00
Alexis Swartz	Service	11/04/2024	Review whinstone production 19.	0.40	\$850.00	\$340.00
Matthew Frederick	Service	11/04/2024	Communicate with LKC attorneys about trial preparation.	0.20	\$1,300.00	\$260.00
Alexis Swartz	Service	11/04/2024	Review exhibit list.	0.50	\$850.00	\$425.00
Matthew Frederick	Service	11/04/2024	Review pretrial filings.	0.80	\$1,300.00	\$1,040.00
Todd Disher	Service	11/04/2024	Call with LKC legal team.	0.40	\$1,300.00	\$520.00
Todd Disher	Service	11/04/2024	Prepare for upcoming trial.	1.30	\$1,300.00	\$1,690.00
Loretta Howard	Expense	11/04/2024	E115 Deposition transcripts: Invoice 709068 from Planet Depos re: deposition of N. Milijkovic, Pd.D.	1.00	\$4,554.45	\$4,554.45
Jacob Richards	Service	11/04/2024	Communicate internally regarding motions in limine.	0.70	\$850.00	\$595.00
Jacob Richards	Service	11/04/2024	Cite check and proofread motions in limine.	2.30	\$850.00	\$1,955.00
Jacob Richards	Service	11/04/2024	Attend LKC internal strategy call.	0.50	\$850.00	\$425.00
Jacob Richards	Service	11/04/2024	Analyze images from Whinstone production; review correspondence from LKC team regarding same.	0.60	\$850.00	\$510.00
Andrew Davis	Service	11/04/2024	Draft and revise written briefing.	8.50	\$1,300.00	\$11,050.00
Andrew Davis	Service	11/04/2024	Communicate internally re case updates and strategy.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	11/04/2024	Analyze and revise briefing for motion-to-assume proceedings.	0.80	\$1,300.00	\$1,040.00
Will Thompson	Service	11/04/2024	Communicate with LKC case team re trial preparation and case strategy.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	11/04/2024	Prepare for cross-examinations of Whinstone witnesses at trial.	1.60	\$1,300.00	\$2,080.00
Will Thompson	Service	11/04/2024	Prepare for direct examinations of Rhodium witnesses at trial.	0.90	\$1,300.00	\$1,170.00

Mark Rothrock	Service	11/05/2024	Draft cross-examination outline.	8.30	\$850.00	\$7,055.00
Matthew Frederick	Service	11/05/2024	Draft trial outlines.	7.70	\$1,300.00	\$10,010.00
Alexis Swartz	Service	11/05/2024	Communicate internally regarding trial planning, motions in limine, and other trial prep tasks.	2.10	\$850.00	\$1,785.00
Alexis Swartz	Service	11/05/2024	Attend in firm meeting to discuss case strategy and trial planning.	0.40	\$850.00	\$340.00
Jonathan Cohn	Service	11/05/2024	Review transcripts.	4.00	\$1,400.00	\$5,600.00
Alexis Swartz	Service	11/05/2024	Discuss direct outline with T. Disher.	0.40	\$850.00	\$340.00
Matthew Frederick	Service	11/05/2024	Communicate with LKC attorneys about trial preparation and strategy.	0.40	\$1,300.00	\$520.00
Alexis Swartz	Service	11/05/2024	Correct MIL filings.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	11/05/2024	Discuss Burnett outline with J. Richardson.	0.30	\$850.00	\$255.00
Jonathan Cohn	Service	11/05/2024	Strategy calls w W Thompson and J Stokes.	0.50	\$1,400.00	\$700.00
Alexis Swartz	Service	11/05/2024	Draft and revise MIL #4.	1.50	\$850.00	\$1,275.00
Alexis Swartz	Service	11/05/2024	Discuss motion in limine draft with A. Davis.	0.10	\$850.00	\$85.00
Alexis Swartz	Service	11/05/2024	Revise MIL #4.	1.50	\$850.00	\$1,275.00
Jonathan Cohn	Service	11/05/2024	Revise MSJ reply.	1.50	\$1,400.00	\$2,100.00
Jonathan Cohn	Service	11/05/2024	Client update/strategy call.	0.80	\$1,400.00	\$1,120.00
Matthew Frederick	Service	11/05/2024	Revise pretrial motion.	0.80	\$1,300.00	\$1,040.00
Jonathan Cohn	Service	11/05/2024	Revise MIL.	0.40	\$1,400.00	\$560.00
Todd Disher	Service	11/05/2024	Continue to prepare for trial.	2.30	\$1,300.00	\$2,990.00
Jacob Richards	Service	11/05/2024	Strategize with LKC team.	0.40	\$850.00	\$340.00
Jacob Richards	Service	11/05/2024	Communicate internally regarding cross exam outlines.	0.40	\$850.00	\$340.00
Jacob Richards	Service	11/05/2024	Begin draft of cross exam outline.	1.70	\$850.00	\$1,445.00
Andrew Davis	Service	11/05/2024	Communicate internally re case updates and strategy.	0.40	\$1,300.00	\$520.00
Andrew Davis	Service	11/05/2024	Review and revise written briefing.	3.80	\$1,300.00	\$4,940.00

Andrew Davis	Service	11/05/2024	Prepare for trial.	1.30	\$1,300.00	\$1,690.00
Loretta Howard	Expense	11/05/2024	E110 Out-of-town travel: Airline fee for travel to Houston for J. Cohn.	1.00	\$1,347.96	\$1,347.96
Will Thompson	Service	11/05/2024	Communicate with LKC case team re trial preparation and case strategy.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	11/05/2024	Prepare for cross-examination of Whinstone fact witness.	3.90	\$1,300.00	\$5,070.00
Will Thompson	Service	11/05/2024	Analyze trial schedule and order of witnesses.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	11/05/2024	Analyze options for likely rebuttal witnesses.	0.70	\$1,300.00	\$910.00
Will Thompson	Service	11/05/2024	Communicate with client and co-counsel re trial strategy and preparation.	0.90	\$1,300.00	\$1,170.00
Will Thompson	Service	11/05/2024	Analyze and revise draft MSJ reply brief.	1.30	\$1,300.00	\$1,690.00
Alexis Swartz	Service	11/06/2024	Attend in firm meeting to discuss case strategy and trial planning.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	11/06/2024	Prepare for expert direct.	5.00	\$850.00	\$4,250.00
Jonathan Cohn	Service	11/06/2024	LKC strategy/update call.	0.30	\$1,400.00	\$420.00
Alexis Swartz	Service	11/06/2024	Revise MIL #4 and draft proposed order.	0.90	\$850.00	\$765.00
Loretta Howard	Expense	11/06/2024	E115 Deposition transcripts: Invoice 3514 re deposition of N. Burnett.	1.00	\$4,555.08	\$4,555.08
Matthew Frederick	Service	11/06/2024	Communicate with LKC attorneys about trial preparation and strategy.	0.30	\$1,300.00	\$390.00
Matthew Frederick	Service	11/06/2024	Draft trial outlines.	11.40	\$1,300.00	\$14,820.00
Jonathan Cohn	Service	11/06/2024	Strategy calls w trial team.	1.00	\$1,400.00	\$1,400.00
Jonathan Cohn	Service	11/06/2024	Review depo transcripts.	1.00	\$1,400.00	\$1,400.00
Jonathan Cohn	Service	11/06/2024	Review briefs.	0.50	\$1,400.00	\$700.00
Alexis Swartz	Service	11/06/2024	Review Whinstone response to motion to exclude Gibson.	0.10	\$850.00	\$85.00
Alexis Swartz	Service	11/06/2024	Review Whinstone response to motions in limine.	0.20	\$850.00	\$170.00

Jacob Richards	Service	11/06/2024	Draft cross exam outline.	6.90	\$850.00	\$5,865.00
Jacob Richards	Service	11/06/2024	Review Whinstone response to motion to exclude expert testimony.	0.30	\$850.00	\$255.00
Jacob Richards	Service	11/06/2024	Strategize with LKC team.	0.30	\$850.00	\$255.00
Andrew Davis	Service	11/06/2024	Review and revise written briefing.	7.90	\$1,300.00	\$10,270.00
Andrew Davis	Service	11/06/2024	Communicate internally re case updates and strategy.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	11/06/2024	Prepare for direct examination of Rhodium expert witness.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	11/06/2024	Analyze and revise draft trial brief.	2.10	\$1,300.00	\$2,730.00
Will Thompson	Service	11/06/2024	Prepare for trial on motion to assume.	2.60	\$1,300.00	\$3,380.00
Jonathan Cohn	Service	11/07/2024	Review/revise briefs.	1.50	\$1,400.00	\$2,100.00
Alexis Swartz	Service	11/07/2024	Review and analyze Rhodium exhibits list.	0.60	\$850.00	\$510.00
Jonathan Cohn	Service	11/07/2024	Review transcripts.	0.50	\$1,400.00	\$700.00
Alexis Swartz	Service	11/07/2024	Attend in firm call to discuss trial planning and case management.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	11/07/2024	Compile and organize MIL briefing.	0.80	\$850.00	\$680.00
Matthew Frederick	Service	11/07/2024	Communicate with LKC attorneys about trial preparation and strategy.	0.30	\$1,300.00	\$390.00
Matthew Frederick	Service	11/07/2024	Draft trial outlines.	7.30	\$1,300.00	\$9,490.00
Alexis Swartz	Service	11/07/2024	Prepare for expert direct exam.	4.10	\$850.00	\$3,485.00
Jonathan Cohn	Service	11/07/2024	LKC team strategy call; strategy calls w trial counsel; and coordination emails.	2.00	\$1,400.00	\$2,800.00
Loretta Howard	Expense	11/07/2024	E110 Out-of-town travel: Transportation expense for W. Thompson re travel to Houston.	1.00	\$145.00	\$145.00
Alexis Swartz	Service	11/07/2024	Discuss depo designations with T. Disher and J. Cohn.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	11/07/2024	Propose deposition designations.	1.00	\$850.00	\$850.00

Jonathan Cohn	Service	11/07/2024	Trial prep.	1.50	\$1,400.00	\$2,100.00
Loretta Howard	Expense	11/07/2024	E110 Out-of-town travel: Uber expense for W. Thompson to bus terminal in Austin.	1.00	\$31.22	\$31.22
Todd Disher	Service	11/07/2024	Discuss trial with LKC legal team.	0.40	\$1,300.00	\$520.00
Todd Disher	Service	11/07/2024	Discuss trial with J. Cohn.	0.30	\$1,300.00	\$390.00
Todd Disher	Service	11/07/2024	Discuss trial with W. Thompson.	0.20	\$1,300.00	\$260.00
Todd Disher	Service	11/07/2024	Designate depo clips for trial.	0.80	\$1,300.00	\$1,040.00
Alexis Swartz	Service	11/07/2024	Draft deposition designations.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	11/07/2024	Review trial briefing.	0.90	\$850.00	\$765.00
Matthew Frederick	Service	11/07/2024	Communicate with Will Thompson about trial outlines.	0.20	\$1,300.00	\$260.00
Matthew Frederick	Service	11/07/2024	Communicate with Jacob Richards about trial preparation.	0.10	\$1,300.00	\$130.00
Matthew Frederick	Service	11/07/2024	Review trial briefs.	1.20	\$1,300.00	\$1,560.00
Jacob Richards	Service	11/07/2024	Continue drafting cross exam outline.	7.80	\$850.00	\$6,630.00
Jacob Richards	Service	11/07/2024	Strategize with LKC team.	0.40	\$850.00	\$340.00
Jacob Richards	Service	11/07/2024	Communicate internally regarding cross exam outline.	0.40	\$850.00	\$340.00
Jacob Richards	Service	11/07/2024	Analyze Whinstone's response to motions in limine.	0.60	\$850.00	\$510.00
Jacob Richards	Service	11/07/2024	Review Whinstone's trial brief & related correspondence from LKC and Stris teams.	0.40	\$850.00	\$340.00
Loretta Howard	Expense	11/07/2024	E110 Out-of-town travel: Meal expense for trial team members.	1.00	\$119.59	\$119.59
Andrew Davis	Service	11/07/2024	Communicate internally re case updates and strategy.	0.30	\$1,300.00	\$390.00
Andrew Davis	Service	11/07/2024	Review and analyze response briefing.	0.80	\$1,300.00	\$1,040.00
Andrew Davis	Service	11/07/2024	Review and analyze depositions and key exhibits from direct and cross outlines.	2.50	\$1,300.00	\$3,250.00
Will Thompson	Service	11/07/2024	Communicate with LKC case team re trial preparation and case strategy.	0.30	\$1,300.00	\$390.00

Will Thompson	Service	11/07/2024	Communicate with T. Disher re trial preparation.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	11/07/2024	Communicate with C. Topping re trial preparation.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	11/07/2024	Prepare for argument re motions in limine.	3.60	\$1,300.00	\$4,680.00
Will Thompson	Service	11/07/2024	Analyze Whinstone filings in preparation for pre-trial hearing.	1.10	\$1,300.00	\$1,430.00
Will Thompson	Service	11/07/2024	Prepare for cross-examinations of Whinstone witnesses.	3.10	\$1,300.00	\$4,030.00
Will Thompson	Service	11/07/2024	Analyze trial strategy in light of recent Whinstone filings and fact development.	2.60	\$1,300.00	\$3,380.00
Alexis Swartz	Service	11/08/2024	Communicate internally and with co-counsel regarding trial and case management.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	11/08/2024	Revise Deposition designations.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	11/08/2024	Draft Brendan counter designations.	2.70	\$850.00	\$2,295.00
Alexis Swartz	Service	11/08/2024	Discuss trial logistics with T. Disher.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	11/08/2024	Attend in firm meeting to discuss case management and trial.	0.50	\$850.00	\$425.00
Jonathan Cohn	Service	11/08/2024	LKC strategy call.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	11/08/2024	Trial prep.	1.00	\$1,400.00	\$1,400.00
Matthew Frederick	Service	11/08/2024	Communicate with LKC attorneys about trial preparation and strategy.	0.40	\$1,300.00	\$520.00
Matthew Frederick	Service	11/08/2024	Draft trial outlines.	6.20	\$1,300.00	\$8,060.00
Alexis Swartz	Service	11/08/2024	Attend remotely pretrial conference hearing.	3.10	\$850.00	\$2,635.00
Alexis Swartz	Service	11/08/2024	Prepare for expert direct examination.	0.50	\$850.00	\$425.00
Alexis Swartz	Service	11/08/2024	Debrief pretrial conference.	1.70	\$850.00	\$1,445.00
Matthew Frederick	Service	11/08/2024	Communicate with Jacob Richards about trial outlines.	0.10	\$1,300.00	\$130.00
Alexis Swartz	Service	11/08/2024	Analyze whinstone exhibits.	0.60	\$850.00	\$510.00
Todd Disher	Service	11/08/2024	Prepare for cross examination of	3.10	\$1,300.00	\$4,030.00

			fact witness.			
Todd Disher	Service	11/08/2024	Prepare for direct examination of expert witness.	2.80	\$1,300.00	\$3,640.00
Todd Disher	Service	11/08/2024	Discuss trial issues with LKC legal team.	0.50	\$1,300.00	\$650.00
Jacob Richards	Service	11/08/2024	Communicate internally regarding cross exam outline.	0.20	\$850.00	\$170.00
Jacob Richards	Service	11/08/2024	Revise cross exam outline to implement partner feedback.	5.80	\$850.00	\$4,930.00
Jacob Richards	Service	11/08/2024	Attend post-hearing debrief call with co-counsel.	1.30	\$850.00	\$1,105.00
Jacob Richards	Service	11/08/2024	Strategize with LKC team.	0.50	\$850.00	\$425.00
Jacob Richards	Service	11/08/2024	Research case law on contract interpretation issues and communicate findings to LKC team.	2.70	\$850.00	\$2,295.00
Andrew Davis	Service	11/08/2024	Communicate internally re case updates and strategy.	0.50	\$1,300.00	\$650.00
Andrew Davis	Service	11/08/2024	Research legal issues in response to Whinstone written briefing.	5.20	\$1,300.00	\$6,760.00
Andrew Davis	Service	11/08/2024	Attend virtually motion hearing.	2.00	\$1,300.00	\$2,600.00
Andrew Davis	Service	11/08/2024	Communicate with co-counsel following hearing.	1.50	\$1,300.00	\$1,950.00
Will Thompson	Service	11/08/2024	Prepare for argument re motions in limine and pre-trial hearing.	2.70	\$1,300.00	\$3,510.00
Will Thompson	Service	11/08/2024	Attend and participate in pre-trial and MSJ hearing.	2.90	\$1,300.00	\$3,770.00
Will Thompson	Service	11/08/2024	Analyze pre-trial and MSJ hearing for purposes of trial preparation.	1.80	\$1,300.00	\$2,340.00
Will Thompson	Service	11/08/2024	Coordinate trial-preparation activities for motion-to-assume trial.	2.10	\$1,300.00	\$2,730.00
Will Thompson	Service	11/08/2024	Prepare for cross-examinations of Whinstone witnesses.	4.30	\$1,300.00	\$5,590.00
Alexis Swartz	Service	11/09/2024	Prepare for Mljovic testimony.	4.00	\$850.00	\$3,400.00
Jonathan Cohn	Service	11/09/2024	Trial prep.	2.00	\$1,400.00	\$2,800.00
Alexis Swartz	Service	11/09/2024	Draft deposition designations.	0.20	\$850.00	\$170.00



Matthew Frederick	Service	11/09/2024	Revise trial outlines.	4.00	\$1,300.00	\$5,200.00
Matthew Frederick	Service	11/09/2024	Communicate with Jacob Richards about trial outlines.	0.20	\$1,300.00	\$260.00
Todd Disher	Service	11/09/2024	Prepare for cross examinations.	6.20	\$1,300.00	\$8,060.00
Jacob Richards	Service	11/09/2024	Conduct follow-up research on contract interpretation issue and communicate findings to LKC and Stris teams.	2.40	\$850.00	\$2,040.00
Jacob Richards	Service	11/09/2024	Communicate with M. Frederick regarding cross exam outline.	0.20	\$850.00	\$170.00
Andrew Davis	Service	11/09/2024	Prepare for trial.	3.10	\$1,300.00	\$4,030.00
Will Thompson	Service	11/09/2024	Analyze issues re direct examination of Rhodium fact witness.	1.60	\$1,300.00	\$2,080.00
Will Thompson	Service	11/09/2024	Analyze issues re direct examination of Rhodium fact and corporate-representative witness.	2.10	\$1,300.00	\$2,730.00
Will Thompson	Service	11/09/2024	Analyze allocation of trial tasks among trial team.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	11/09/2024	Prepare for trial in motion-to-assume proceedings, including cross-examinations of Whinstone's witnesses.	8.80	\$1,300.00	\$11,440.00
Matthew Frederick	Service	11/10/2024	Draft trial outlines.	1.20	\$1,300.00	\$1,560.00
Mark Rothrock	Service	11/10/2024	Prepare exhibit list for trial.	1.00	\$850.00	\$850.00
Jonathan Cohn	Service	11/10/2024	Trial prep.	8.50	\$1,400.00	\$11,900.00
Alexis Swartz	Service	11/10/2024	Prepare for expert direct examination.	7.00	\$850.00	\$5,950.00
Todd Disher	Service	11/10/2024	Prepare for direct examination.	5.30	\$1,300.00	\$6,890.00
Todd Disher	Service	11/10/2024	Discuss issues related to trial.	1.20	\$1,300.00	\$1,560.00
Todd Disher	Service	11/10/2024	Prepare for cross examination.	3.50	\$1,300.00	\$4,550.00
Jacob Richards	Service	11/10/2024	Implement further partner revisions to cross exam outline; communicate internally regarding same.	1.90	\$850.00	\$1,615.00
Andrew Davis	Service	11/10/2024	Prepare for trial.	6.80	\$1,300.00	\$8,840.00
Will Thompson	Service	11/10/2024	Prepare for trial in motion-to-assume proceedings, including	12.20	\$1,300.00	\$15,860.00

			cross-examinations of Whinstone's witnesses.			
Will Thompson	Service	11/10/2024	Analyze issues re opening argument and direct examination of Rhodium fact witness.	2.20	\$1,300.00	\$2,860.00
Matthew Frederick	Service	11/11/2024	Draft trial outlines.	4.60	\$1,300.00	\$5,980.00
Alexis Swartz	Service	11/11/2024	Prepare for expert examination and other trial preparation.	10.00	\$850.00	\$8,500.00
Mark Rothrock	Service	11/11/2024	Prepare cross-examination outline.	2.10	\$850.00	\$1,785.00
Matthew Frederick	Service	11/11/2024	Review court order on motion to exclude, motions in limine, and motion to exclude MSJ exhibits.	0.10	\$1,300.00	\$130.00
Matthew Frederick	Service	11/11/2024	Review Whinstone motion to strike deposition designations.	0.10	\$1,300.00	\$130.00
Jonathan Cohn	Service	11/11/2024	Trial prep.	9.50	\$1,400.00	\$13,300.00
Todd Disher	Service	11/11/2024	Prepare for direct examination of expert witness.	5.80	\$1,300.00	\$7,540.00
Todd Disher	Service	11/11/2024	Prepare for cross examination.	3.50	\$1,300.00	\$4,550.00
Loretta Howard	Expense	11/11/2024	E110 Out-of-town travel: Meal expense for trial team members.	1.00	\$29.96	\$29.96
Andrew Davis	Service	11/11/2024	Prepare for trial.	9.50	\$1,300.00	\$12,350.00
Will Thompson	Service	11/11/2024	Analyze trial strategy for coordination of direct and cross examinations.	1.10	\$1,300.00	\$1,430.00
Will Thompson	Service	11/11/2024	Analyze trial strategy re the rule and sequestration of witnesses.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	11/11/2024	Prepare for trial in motion-to-assume proceedings, including cross-examinations of Whinstone's witnesses.	12.70	\$1,300.00	\$16,510.00
Jacob Richards	Service	11/11/2024	Review Whinstone's motion to strike and court order re motions.	0.60	\$850.00	\$510.00
Alexis Swartz	Service	11/12/2024	Prepare for and attend trial.	12.00	\$850.00	\$10,200.00
Alexis Swartz	Service	11/12/2024	Prepare for expert testimony.	0.90	\$850.00	\$765.00
Todd Disher	Service	11/12/2024	Prepare for and attend first day of trial.	9.30	\$1,300.00	\$12,090.00

Todd Disher	Service	11/12/2024	Prepare for trial.	2.10	\$1,300.00	\$2,730.00
Jonathan Cohn	Service	11/12/2024	Trial and prep.	10.00	\$1,400.00	\$14,000.00
Andrew Davis	Service	11/12/2024	Prepare for and attend trial.	11.00	\$1,300.00	\$14,300.00
Will Thompson	Service	11/12/2024	Prepare for trial in motion-to-assume proceedings, including cross-examinations of Whinstone's witnesses.	12.70	\$1,300.00	\$16,510.00
Will Thompson	Service	11/12/2024	Prepare for trial in motion-to-assume proceedings, including cross-examinations of Whinstone's witnesses.	2.30	\$1,300.00	\$2,990.00
Will Thompson	Service	11/12/2024	Attend and participate in trial for motion to assume.	6.90	\$1,300.00	\$8,970.00
Will Thompson	Service	11/12/2024	Analyze trial from that day and prepare for remaining days in motion-to-assume proceedings.	5.80	\$1,300.00	\$7,540.00
Loretta Howard	Expense	11/12/2024	Reimbursable expenses: Prevail Invoice 3578 for the deposition of J. McGonegal.	1.00	\$5,350.95	\$5,350.95
Alexis Swartz	Service	11/13/2024	Prepare for and attend trial.	13.00	\$850.00	\$11,050.00
Matthew Frederick	Service	11/13/2024	Virtually attend day 2 of assumption trial.	5.80	\$1,300.00	\$7,540.00
Jonathan Cohn	Service	11/13/2024	Trial and prep.	11.00	\$1,400.00	\$15,400.00
Mark Rothrock	Service	11/13/2024	Monitor Rhodium trial proceedings.	1.50	\$850.00	\$1,275.00
Todd Disher	Service	11/13/2024	Prepare for and attend trial.	14.30	\$1,300.00	\$18,590.00
Andrew Davis	Service	11/13/2024	Prepare for and attend trial.	8.00	\$1,300.00	\$10,400.00
Will Thompson	Service	11/13/2024	Prepare for trial day in motion-to-assume proceedings, including cross-examinations of Whinstone's witnesses.	2.10	\$1,300.00	\$2,730.00
Will Thompson	Service	11/13/2024	Attend and participate in trial for motion to assume.	7.60	\$1,300.00	\$9,880.00
Will Thompson	Service	11/13/2024	Analyze trial from that day and prepare for remaining days in motion-to-assume proceedings.	4.70	\$1,300.00	\$6,110.00
Will Thompson	Service	11/13/2024	Prepare for closing argument.	2.10	\$1,300.00	\$2,730.00
Jacob Richards	Service	11/13/2024	Communicate with team regarding trial support tasks.	0.30	\$850.00	\$255.00

Alexis Swartz	Service	11/14/2024	Prepare for and attend trial.	12.00	\$850.00	\$10,200.00
Matthew Frederick	Service	11/14/2024	Virtually attend day 3 of assumption trial.	6.00	\$1,300.00	\$7,800.00
Mark Rothrock	Service	11/14/2024	Monitor Rhodium trial proceedings.	1.00	\$850.00	\$850.00
Jonathan Cohn	Service	11/14/2024	Trial and prep.	13.00	\$1,400.00	\$18,200.00
Loretta Howard	Expense	11/14/2024	E110 Out-of-town travel: Dinner for A. Swartz.	1.00	\$85.88	\$85.88
Todd Disher	Service	11/14/2024	Prepare for and attend trial.	14.90	\$1,300.00	\$19,370.00
Andrew Davis	Service	11/14/2024	Virtually attend Rhodium trial and review transcript.	2.70	\$1,300.00	\$3,510.00
Will Thompson	Service	11/14/2024	Prepare for trial day in motion-to-assume proceedings, including cross-examinations of Whinstone's witnesses.	2.00	\$1,300.00	\$2,600.00
Will Thompson	Service	11/14/2024	Attend and participate in trial for motion to assume.	7.70	\$1,300.00	\$10,010.00
Will Thompson	Service	11/14/2024	Analyze trial from that day and prepare for remaining days in motion-to-assume proceedings.	6.10	\$1,300.00	\$7,930.00
Will Thompson	Service	11/14/2024	Prepare for closing argument.	1.80	\$1,300.00	\$2,340.00
Matthew Frederick	Service	11/15/2024	Virtually attend day 4 of assumption trial.	3.80	\$1,300.00	\$4,940.00
Loretta Howard	Expense	11/15/2024	E110 Out-of-town travel: Travel expense Volane for A. Swartz (Houston to Austin).	1.00	\$145.00	\$145.00
Loretta Howard	Expense	11/15/2024	E110 Out-of-town travel: Dinner for A. Swartz re travel to Houston.	1.00	\$22.15	\$22.15
Todd Disher	Service	11/15/2024	Prepare for and attend trial.	13.80	\$1,300.00	\$17,940.00
Jonathan Cohn	Service	11/15/2024	Trial and prep.	7.50	\$1,400.00	\$10,500.00
Alexis Swartz	Service	11/15/2024	Prepare for and attend trial.	10.00	\$850.00	\$8,500.00
Loretta Howard	Expense	11/15/2024	E110 Out-of-town travel: Uber charge home for bus station for A. Swartz.	1.00	\$41.88	\$41.88
Andrew Davis	Service	11/15/2024	Virtually attend Rhodium trial.	1.20	\$1,300.00	\$1,560.00
Will Thompson	Service	11/15/2024	Prepare for trial in motion-to-assume proceedings, including cross-examinations of	5.10	\$1,300.00	\$6,630.00

			Whinstone fact witness and closing argument.			
Will Thompson	Service	11/15/2024	Attend and participate in trial for motion to assume.	6.60	\$1,300.00	\$8,580.00
Will Thompson	Service	11/15/2024	Analyze trial proceedings on motion to assume to advise Debtors on next steps.	0.80	\$1,300.00	\$1,040.00
Loretta Howard	Expense	11/16/2024	E110 Out-of-town travel: Volane expense returning from Houston to Austin after trial for W. Thompson.	1.00	\$145.00	\$145.00
Andrew Davis	Service	11/16/2024	Review final day of trial transcript.	0.70	\$1,300.00	\$910.00
Will Thompson	Service	11/16/2024	Analyze next steps in light of trial on motion to assume.	0.10	\$1,300.00	\$130.00
Jonathan Cohn	Service	11/17/2024	Call w C Topping and J Stokes re strategy.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	11/17/2024	Damages strategy.	0.80	\$1,400.00	\$1,120.00
Jonathan Cohn	Service	11/18/2024	Team call re damages.	0.50	\$1,400.00	\$700.00
Meredith Criner	Service	11/18/2024	Research on potential recovery of attorney's fees if Rhodium is successful on various contract claims.	3.30	\$850.00	\$2,805.00
Jonathan Cohn	Service	11/18/2024	Board Call.	2.00	\$1,400.00	\$2,800.00
Loretta Howard	Expense	11/18/2024	E115 Deposition transcripts: Prevail Invoice 3640 deposition of K. Haugen.	1.00	\$7,553.85	\$7,553.85
Will Thompson	Service	11/18/2024	Analyze damages issues re recovery against Whinstone in light of motion-to-assume trial and coordinate research projects re damages.	2.40	\$1,300.00	\$3,120.00
Will Thompson	Service	11/18/2024	Analyze court order re status conference and plan for status conference.	0.10	\$1,300.00	\$130.00
Jacob Richards	Service	11/18/2024	Begin analysis of Texas state law research question related to affirmative case for damages.	0.70	\$850.00	\$595.00
Andrew Davis	Service	11/18/2024	Coordinate with potential experts.	0.40	\$1,300.00	\$520.00
Mark Rothrock	Service	11/19/2024	Research effect of contractual damages limitations for	5.60	\$850.00	\$4,760.00

			purposes of settlement negotiations.			
Meredith Criner	Service	11/19/2024	Research on potential recovery of attorney's fees if Rhodium is successful on various contract claims.	2.90	\$850.00	\$2,465.00
Jonathan Cohn	Service	11/19/2024	Client call on strategy.	0.50	\$1,400.00	\$700.00
Will Thompson	Service	11/19/2024	Analyze issues re closing slides and communication to court staff.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	11/19/2024	Analyze research related to monetary recovery against Whinstone.	1.10	\$1,300.00	\$1,430.00
Jacob Richards	Service	11/19/2024	Finish analysis of Texas state law damages issue; draft summary of findings for LKC team.	4.20	\$850.00	\$3,570.00
Andrew Davis	Service	11/19/2024	Research and coordinate with potential experts.	1.60	\$1,300.00	\$2,080.00
Jonathan Cohn	Service	11/20/2024	Damages analysis.	1.30	\$1,400.00	\$1,820.00
Jonathan Cohn	Service	11/20/2024	Call w potential damages expert.	0.40	\$1,400.00	\$560.00
Jonathan Cohn	Service	11/20/2024	Strategy calls w client and co-counsel.	1.50	\$1,400.00	\$2,100.00
Will Thompson	Service	11/20/2024	Analyze damages issues with J. Cohn and J. Stokes.	1.00	\$1,300.00	\$1,300.00
Will Thompson	Service	11/20/2024	Communicate with C. Topping, J. Cohn, and J. Stokes.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	11/20/2024	Communicate with C. Topping and additional client representatives.	0.60	\$1,300.00	\$780.00
Jacob Richards	Service	11/20/2024	Conduct follow-up research on Texas causes of action; communicate with LKC team regarding same.	1.20	\$850.00	\$1,020.00
Andrew Davis	Service	11/20/2024	Research and coordinate with potential experts.	1.70	\$1,300.00	\$2,210.00
Jonathan Cohn	Service	11/21/2024	Expert calls.	1.20	\$1,400.00	\$1,680.00
Will Thompson	Service	11/21/2024	Analyze issues re upcoming status conference.	0.20	\$1,300.00	\$260.00
Andrew Davis	Service	11/21/2024	Coordinate re potential experts.	1.40	\$1,300.00	\$1,820.00

Jonathan Cohn	Service	11/25/2024	Call w potential expert.	0.50	\$1,400.00	\$700.00
Andrew Davis	Service	11/25/2024	Coordinate re potential experts.	1.00	\$1,300.00	\$1,300.00
Alexis Swartz	Service	11/26/2024	Attend hearing on motion to assume.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	11/26/2024	Debrief after motion to assume ruling.	0.60	\$850.00	\$510.00
Jonathan Cohn	Service	11/26/2024	Status conference.	0.30	\$1,400.00	\$420.00
Jonathan Cohn	Service	11/26/2024	Strategy calls.	1.70	\$1,400.00	\$2,380.00
Todd Disher	Service	11/26/2024	Attend status conference and discuss same.	2.10	\$1,300.00	\$2,730.00
Jacob Richards	Service	11/26/2024	Attend telephonic status conference.	0.30	\$850.00	\$255.00
Andrew Davis	Service	11/26/2024	Virtually attend status conference.	0.30	\$1,300.00	\$390.00
Andrew Davis	Service	11/26/2024	Attend debrief from status conference.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	11/26/2024	Prepare for status conference re motion to assume.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	11/26/2024	Attend status conference re motion to assume.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	11/26/2024	Debrief with co-counsel and plan next steps in light of partial ruling on motion to assume.	1.40	\$1,300.00	\$1,820.00
Will Thompson	Service	11/26/2024	Communicate with client and co-counsel to analyze strategy in light of partial ruling on motion to assume.	1.00	\$1,300.00	\$1,300.00
Will Thompson	Expense	11/26/2024	E124 Other: Shredding documents marked confidential under the protective order after they were no longer needed.	1.00	\$26.00	\$26.00
Andrew Davis	Service	11/29/2024	Coordinate re potential experts.	0.20	\$1,300.00	\$260.00

Time Keeper	Quantity	Rate	Total
Jonathan Cohn	102.6	\$1,400.00	\$143,640.00
Jonathan Cohn	2.5	\$700.00	\$1,750.00
Meredith Criner	6.2	\$850.00	\$5,270.00
Andrew Davis	99.3	\$1,300.00	\$129,090.00

Todd Disher	98.7	\$1,300.00	\$128,310.00
Matthew Frederick	82.5	\$1,300.00	\$107,250.00
Jacob Richards	56.2	\$850.00	\$47,770.00
Mark Rothrock	41.0	\$850.00	\$34,850.00
Michele Somboon	0.5	\$500.00	\$250.00
Alexis Swartz	121.1	\$850.00	\$102,935.00
Will Thompson	188.6	\$1,300.00	\$245,180.00
<b>Subtotal</b>			<b>\$983,585.43</b>
<b>Invoice Discount</b>			<b>\$246,388.50</b>
<i>20% discount (\$50,000) off of first \$250k in services. 25% discount (\$62,500) for next \$250k in services. 30% discount (\$133,888.50) for remainder of services.</i>			
<b>Total</b>			<b>\$737,196.93</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1272	12/04/2024	\$47,436.00	\$0.00	\$47,436.00
1273	12/05/2024	\$337,239.66	\$0.00	\$337,239.66
1327	12/05/2024	\$847,060.41	\$0.00	\$847,060.41

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1400	01/03/2025	\$737,196.93	\$0.00	\$737,196.93
<b>Outstanding Balance</b>				<b>\$1,968,933.00</b>
<b>Total Amount Outstanding</b>				<b>\$1,968,933.00</b>

Please make all amounts payable to: Lehotsky Keller Cohn LLP

Please pay within 30 days.



## Remittance Advice

### Checking Information

**Remit checks to:** LEHOTSKY KELLER COHN LLP  
200 Massachusetts Avenue, NW Suite 700  
Washington DC 20001

### Wire Transfer Information

**Bank Name/Address:** Receiving bank: Chain Bridge Bank, N.A., McLean, VA

**Bank ABA/Routing #:** [REDACTED]

**Name/Account #:** Lehotsky Keller Cohn Operating Account  
LEHOTSKY KELLER COHN LLP  
Account number: [REDACTED]

Please include the invoice number 1400 as an additional reference so we may accurately identify and apply your payment.

Please provide adequate payment to cover the wire fees assessed by your financial institution.

# Lehotsky Keller Cohn LLP

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**  
Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**  
200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

## INVOICE

Invoice # 1401  
Date: 12/04/2024  
Due On: 01/03/2025

Invoice Number		Total
1401		\$9,222.50
Subtotal		\$13,175.00
Tax		\$0.00
Amount Due		\$9,222.50

**Lehotsky Keller Cohn LLP**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**INVOICE**

Invoice # 1401  
Date: 12/04/2024  
Due On: 01/03/2025

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**00776-Rhodium 30MW LLC****Bankruptcy Fee Application Time**

Attorney	Type	Date	Notes	Quantity	Rate	Total
Jacob Richards	Service	11/01/2024	Communicate internally regarding fee application status.	0.40	\$850.00	\$340.00
Jacob Richards	Service	11/04/2024	Revise October fee application draft and review invoices for privileged information.	3.40	\$850.00	\$2,890.00
Jacob Richards	Service	11/04/2024	Communicate internally regarding fee application and service requirements.	1.10	\$850.00	\$935.00
Jacob Richards	Service	11/04/2024	Proofread and double-check exhibits for fee application.	0.60	\$850.00	\$510.00
Jacob Richards	Service	11/05/2024	Communicate internally and with co-counsel regarding first monthly fee application.	1.10	\$850.00	\$935.00
Jacob Richards	Service	11/05/2024	Communicate internally re necessary supporting documents for fee application.	0.40	\$850.00	\$340.00
Jacob Richards	Service	11/05/2024	Review and revise August and September invoices to protect privileged information.	2.90	\$850.00	\$2,465.00
Jacob Richards	Service	11/06/2024	Finalize fee application for filing (1.1); communicate internally and with co-counsel regarding filing and service (.6).	1.70	\$850.00	\$1,445.00
Jacob Richards	Service	11/07/2024	Communicate internally and with co-counsel regarding first and second monthly fee applications.	0.60	\$850.00	\$510.00
Jacob Richards	Service	11/08/2024	Communicate internally regarding timing for filing October monthly fee application.	0.40	\$850.00	\$340.00
Jacob Richards	Service	11/08/2024	Begin draft of first quarterly interim fee	1.20	\$850.00	\$1,020.00

application.						
Jacob Richards	Service	11/10/2024	Revise and proofread October fee application.	0.60	\$850.00	\$510.00
Jacob Richards	Service	11/10/2024	Continue drafting first interim quarterly fee application.	0.50	\$850.00	\$425.00
Jacob Richards	Service	11/11/2024	Communicate with co-counsel regarding second monthly fee application.	0.20	\$850.00	\$170.00
Jacob Richards	Service	11/12/2024	Communicate with co-counsel regarding October fee application; serve as-filed copy and LEDES data.	0.40	\$850.00	\$340.00

Time Keeper	Quantity	Rate	Total
Jacob Richards	15.5	\$850.00	\$13,175.00
<b>Subtotal</b>			<b>\$13,175.00</b>
<b>Invoice Discount</b>			<b>30.0%</b>
\$3,952.50 discount - 30% off hourly services			
<b>Total</b>			<b>\$9,222.50</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1328	12/05/2024	\$8,571.50	\$0.00	\$8,571.50

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1401	01/03/2025	\$9,222.50	\$0.00	\$9,222.50
<b>Outstanding Balance</b>				<b>\$17,794.00</b>
<b>Total Amount Outstanding</b>				<b>\$17,794.00</b>

Please make all amounts payable to: Lehotsky Keller Cohn LLP

Please pay within 30 days.



## Remittance Advice

### Checking Information

**Remit checks to:** LEHOTSKY KELLER COHN LLP  
200 Massachusetts Avenue, NW Suite 700  
Washington DC 20001

### Wire Transfer Information

**Bank Name/Address:** Receiving bank: Chain Bridge Bank, N.A., McLean, VA

**Bank ABA/Routing #:** [REDACTED]

**Name/Account #:** Lehotsky Keller Cohn Operating Account  
LEHOTSKY KELLER COHN LLP  
Account number: [REDACTED]

Please include the invoice number 1401 as an additional reference so we may accurately identify and apply your payment.

Please provide adequate payment to cover the wire fees assessed by your financial institution.

**Lehotsky Keller Cohn LLP**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**  
Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**  
200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

# INVOICE

Invoice # 1506  
Date: 01/15/2025  
Due On: 02/14/2025

Invoice Number	Total
1506	\$50,536.00
Subtotal	\$63,170.00
Tax	\$0.00
Amount Due	\$50,536.00

# Lehotsky Keller Cohn LLP

# INVOICE

200 Massachusetts Avenue, NW Suite 700  
 Washington, District of Columbia 20001

Invoice # 1506  
 Date: 01/15/2025  
 Due On: 02/14/2025

Rhodium 30MW LLC  
 4146 W US Highway 79  
 Rockdale, TX 76567

## 00366-Rhodium 30MW LLC

## Whinstone Litigation

Attorney	Type	Date	Notes	Quantity	Rate	Total
Jonathan Cohn	Service	12/03/2024	Strategy call w client and W Thompson.	0.20	\$1,400.00	\$280.00
Alexis Swartz	Service	12/03/2024	Discuss adversary complaint filing with W. Thompson and Quinn team.	0.40	\$850.00	\$340.00
Jonathan Cohn	Service	12/03/2024	Strategy call with client and outside counsel.	1.00	\$1,400.00	\$1,400.00
Will Thompson	Service	12/03/2024	Communicate with C. Topping and J. Cohn re case strategy and pursuit of damages from Whinstone.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	12/03/2024	Analyze damages issues re claims against Whinstone.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	12/03/2024	Interview potential expert for damages claims against Whinstone.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	12/03/2024	Analyze issues re adversary complaint against Whinstone and coordinate drafting of complaint.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	12/03/2024	Communicate with client and co-counsel re case strategy.	0.90	\$1,300.00	\$1,170.00
Alexis Swartz	Service	12/04/2024	Draft adversary complaint.	3.30	\$850.00	\$2,805.00
Will Thompson	Service	12/04/2024	Analyze strategy for damages claims against Whinstone with J. Cohn and J. Stokes.	0.60	\$1,300.00	\$780.00
Andrew Davis	Service	12/04/2024	Coordinate potential expert.	0.20	\$1,300.00	\$260.00
Andrew Davis	Service	12/05/2024	Coordinate potential expert.	0.10	\$1,300.00	\$130.00
Alexis Swartz	Service	12/06/2024	Draft Rhodium damages complaint.	1.90	\$850.00	\$1,615.00
Will Thompson	Service	12/06/2024	Interview potential expert for damages claims against Whinstone.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	12/06/2024	Communicate with A. Davis re potential expert witnesses for damages claims	0.10	\$1,300.00	\$130.00



against Whinstone.						
Andrew Davis	Service	12/06/2024	Communiante with potential expert and Stris team.	0.70	\$1,300.00	\$910.00
Jonathan Cohn	Service	12/09/2024	Review financing debt.	0.50	\$1,400.00	\$700.00
Will Thompson	Service	12/09/2024	Analyze draft presentation from litigation perspective re motion to assume.	0.90	\$1,300.00	\$1,170.00
Alexis Swartz	Service	12/10/2024	Draft Rhodium damages complaint.	1.00	\$850.00	\$850.00
Will Thompson	Service	12/10/2024	Communicate with client and co-counsel re review of draft presentation and its relation to the motion-to-assume litigation.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	12/10/2024	Analyze draft presentation from litigation perspective re motion to assume.	1.30	\$1,300.00	\$1,690.00
Will Thompson	Service	12/10/2024	Communicate with client and co-counsel re case strategy.	0.20	\$1,300.00	\$260.00
Alexis Swartz	Service	12/11/2024	Research relevant claims and draft Rhodium damages complaint.	4.40	\$850.00	\$3,740.00
Will Thompson	Service	12/11/2024	Communicate with J. Stokes re complaint for damages against Whinstone and preparation of claims.	0.40	\$1,300.00	\$520.00
Jacob Richards	Service	12/11/2024	Communicate with A. Swartz re Texas causes of action.	0.30	\$850.00	\$255.00
Alexis Swartz	Service	12/12/2024	Revise damages complaint.	3.50	\$850.00	\$2,975.00
Alexis Swartz	Service	12/12/2024	Discuss damages complaint with W. Thompson.	0.60	\$850.00	\$510.00
Will Thompson	Service	12/12/2024	Analyze strategic issues behind complaint for damages against Whinstone with A. Swartz.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	12/12/2024	Communicate with J. Stokes re draft damages complaint against Whinstone.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	12/12/2024	Draft disclaimer related to pending motion-to-assume proceedings for draft client presentation.	0.20	\$1,300.00	\$260.00
Alexis Swartz	Service	12/13/2024	Draft adversary damages complaint.	3.80	\$850.00	\$3,230.00
Matthew Frederick	Service	12/16/2024	Review bankruptcy court order.	0.90	\$1,300.00	\$1,170.00
Alexis Swartz	Service	12/16/2024	Review motion to assume order.	1.00	\$850.00	\$850.00
Alexis Swartz	Service	12/16/2024	Discuss motion to assume order with W. Thompson.	0.10	\$850.00	\$85.00
Alexis Swartz	Service	12/16/2024	Research caselaw on motion to assume proceedings.	0.50	\$850.00	\$425.00
Will Thompson	Service	12/16/2024	Analyze and revise draft complaint for damages against Whinstone.	1.00	\$1,300.00	\$1,300.00

Will Thompson	Service	12/16/2024	Analyze court ruling on Phase 1 of motion to assume; develop strategy for next steps.	4.10	\$1,300.00	\$5,330.00
Jacob Richards	Service	12/16/2024	Review interim order.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	12/17/2024	Research bankruptcy proceedings under 365(b) and communicate regarding.	2.50	\$850.00	\$2,125.00
Alexis Swartz	Service	12/17/2024	Revise damages complaint.	3.90	\$850.00	\$3,315.00
Jonathan Cohn	Service	12/17/2024	Weekly call w client and co-counsel.	0.50	\$1,400.00	\$700.00
Will Thompson	Service	12/17/2024	Analyze and revise draft complaint for damages against Whinstone.	1.80	\$1,300.00	\$2,340.00
Will Thompson	Service	12/17/2024	Research and analyze jurisdictional issues for adversary proceeding.	1.80	\$1,300.00	\$2,340.00
Will Thompson	Service	12/17/2024	Communicate with client and co-counsel re next steps in light of court's phase 1 order and strategy for phase 2 and damages complaint.	1.10	\$1,300.00	\$1,430.00
Will Thompson	Service	12/18/2024	Analyze and revise draft complaint for damages against Whinstone.	0.70	\$1,300.00	\$910.00
Will Thompson	Service	12/18/2024	Analyze issues related to effect of motion-to-assume ruling on future proceedings.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	12/19/2024	Analyze and revise press release in light of pending litigation.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	12/19/2024	Prepare filings in federal-court proceedings.	0.20	\$1,300.00	\$260.00
Jonathan Cohn	Service	12/23/2024	Call w C. Topping and outside counsel re strategy.	1.00	\$1,400.00	\$1,400.00
Will Thompson	Service	12/27/2024	Analyze preclusion issues related to motion-to-assume ruling.	1.10	\$1,300.00	\$1,430.00
Will Thompson	Service	12/30/2024	Analyze preclusion issues related to motion-to-assume ruling.	3.10	\$1,300.00	\$4,030.00
Will Thompson	Service	12/30/2024	Analyze issues related to ongoing relationship with Whinstone in light of litigation issues and communicate with client and co-counsel re same.	1.10	\$1,300.00	\$1,430.00
Will Thompson	Service	12/31/2024	Communicate with J. Stokes re litigation strategy for Phase 2 and recovery of damages against Whinstone.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	12/31/2024	Analyze issues related to abstention and recovery of damages against Whinstone.	0.30	\$1,300.00	\$390.00
<b>Quantity Subtotal</b>						<b>57.9</b>
<b>Time Keeper</b>		<b>Quantity</b>		<b>Rate</b>	<b>Total</b>	
Jonathan Cohn		3.2		\$1,400.00	\$4,480.00	

Andrew Davis	1.0	\$1,300.00	\$1,300.00
Matthew Frederick	0.9	\$1,300.00	\$1,170.00
Jacob Richards	0.7	\$850.00	\$595.00
Alexis Swartz	26.9	\$850.00	\$22,865.00
Will Thompson	25.2	\$1,300.00	\$32,760.00
<b>Quantity Total</b>			<b>57.9</b>
<b>Subtotal</b>			<b>\$63,170.00</b>
<b>Invoice Discount</b>			<b>20.0%</b>
<i>20% discount (\$12,634.00) off of first \$250k in services.</i>			
<b>Total</b>			<b>\$50,536.00</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1272	12/04/2024	\$47,436.00	\$37,948.80	\$9,487.20
1273	12/05/2024	\$337,239.66	\$270,142.91	\$67,096.75
1327	12/05/2024	\$847,060.41	\$679,284.91	\$167,775.50
1400	01/03/2025	\$737,196.93	\$634,425.97	\$102,770.96

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1506	02/14/2025	\$50,536.00	\$0.00	\$50,536.00
<b>Outstanding Balance</b>				<b>\$397,666.41</b>
<b>Total Amount Outstanding</b>				<b>\$397,666.41</b>

## Remittance Advice

### Checking Information

**Remit checks to:** LEHOTSKY KELLER COHN LLP  
200 Massachusetts Avenue, NW Suite 700  
Washington DC 20001

### Wire Transfer Information

**Bank Name/Address:** Receiving bank: Chain Bridge Bank, N.A., McLean, VA

**Bank ABA/Routing #:** [REDACTED]

**Name/Account #:** Lehotsky Keller Cohn Operating Account  
LEHOTSKY KELLER COHN LLP  
Account number: [REDACTED]

Please include the invoice number 1506 as an additional reference so we may accurately identify and apply your payment.

# Lehotsky Keller Cohn LLP

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**  
Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**  
200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

## INVOICE

Invoice # 1507  
Date: 01/15/2025  
Due On: 02/14/2025

Invoice Number	Total
1507	\$4,284.00
<hr/>	
Subtotal	\$5,355.00
Tax	\$0.00
<b>Amount Due</b>	<b>\$4,284.00</b>

# Lehotsky Keller Cohn LLP

# INVOICE

200 Massachusetts Avenue, NW Suite 700  
 Washington, District of Columbia 20001

Invoice # 1507  
 Date: 01/15/2025  
 Due On: 02/14/2025

Rhodium 30MW LLC  
 4146 W US Highway 79  
 Rockdale, TX 76567

## 00776-Rhodium 30MW LLC

## Bankruptcy Fee Application Time

Attorney	Type	Date	Notes	Quantity	Rate	Total
Jacob Richards	Service	12/02/2024	Draft third monthly fee statement.	0.80	\$850.00	\$680.00
Jacob Richards	Service	12/03/2024	Revise entries to remove privileged information.	1.20	\$850.00	\$1,020.00
Jacob Richards	Service	12/03/2024	Revise draft of monthly fee application.	0.60	\$850.00	\$510.00
Jacob Richards	Service	12/03/2024	Revise interim fee application.	0.20	\$850.00	\$170.00
Jacob Richards	Service	12/04/2024	Communicate with LKC administrative staff re November invoice and fee application.	0.40	\$850.00	\$340.00
Jacob Richards	Service	12/04/2024	Revise November fee application.	1.10	\$850.00	\$935.00
Jacob Richards	Service	12/04/2024	Communicate with bankruptcy counsel re filing of fee application; serve LEDES data on US trustee.	0.40	\$850.00	\$340.00
Jacob Richards	Service	12/09/2024	Communicate with LKC administrative staff re fee application objection period and payments due.	0.40	\$850.00	\$340.00
Jacob Richards	Service	12/12/2024	Continue drafting interim fee application.	1.20	\$850.00	\$1,020.00
Quantity Subtotal						6.3

Time Keeper	Quantity	Rate	Total
Jacob Richards	6.3	\$850.00	\$5,355.00

Quantity Total 6.3

Subtotal \$5,355.00

Invoice Discount 20.0%

20% discount (\$1,071.00) off of first \$250k in services.

Total \$4,284.00

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1328	12/05/2024	\$8,571.50	\$6,857.20	\$1,714.30
1401	01/03/2025	\$9,222.50	\$0.00	\$9,222.50

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1507	02/14/2025	\$4,284.00	\$0.00	\$4,284.00
Outstanding Balance				\$15,220.80
Total Amount Outstanding				\$15,220.80

## Remittance Advice

### Checking Information

**Remit checks to:** LEHOTSKY KELLER COHN LLP  
200 Massachusetts Avenue, NW Suite 700  
Washington DC 20001

### Wire Transfer Information

**Bank Name/Address:** Receiving bank: Chain Bridge Bank, N.A., McLean, VA

**Bank ABA/Routing #:** [REDACTED]

**Name/Account #:** Lehotsky Keller Cohn Operating Account  
LEHOTSKY KELLER COHN LLP  
Account number: [REDACTED]

Please include the invoice number 1507 as an additional reference so we may accurately identify and apply your payment.



# Lehotsky Keller Cohn LLP

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**  
Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**  
200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

## INVOICE

Invoice # 1535  
Date: 02/21/2025  
Due On: 03/12/2025

Invoice Number	Total
1535	\$117,444.00
<hr/>	
Subtotal	\$146,805.00
Tax	\$0.00
Amount Due	\$117,444.00

**Lehotsky Keller Cohn LLP****INVOICE**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

Invoice # 1535  
Date: 02/21/2025  
Due On: 03/12/2025

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**00366-Rhodium 30MW LLC****Whinstone Litigation**

Attorney	Type	Date	Notes	Quantity	Rate	Total
Jonathan Cohn	Service	01/01/2025	Strategy call w Stris/Quinn team.	0.80	\$1,400.00	\$1,120.00
Jonathan Cohn	Service	01/01/2025	Review damages research.	0.50	\$1,400.00	\$700.00
Will Thompson	Service	01/03/2025	Communicate with J. Stokes re case strategy.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	01/06/2025	Communicate with J. Cohn re strategy for damages case against Whinstone.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	01/06/2025	Analyze issues relate to power contracts for purposes of bankruptcy filing; communicate with client re same.	1.10	\$1,300.00	\$1,430.00
Will Thompson	Service	01/06/2025	Analyze strategy and coordinate research projects for damages complaint against Whinstone.	2.70	\$1,300.00	\$3,510.00
Andrew Davis	Service	01/06/2025	Communicate internally re expert retention.	0.30	\$1,300.00	\$390.00
Jonathan Cohn	Service	01/06/2025	Call with W. Thompson about strategy for damages case.	0.20	\$1,400.00	\$280.00
Alexis Swartz	Service	01/07/2025	Discuss internally phase 2 of bankruptcy.	0.30	\$1,000.00	\$300.00
Jonathan Cohn	Service	01/07/2025	Calls and emails re strategy and adversarial proceeding.	0.50	\$1,400.00	\$700.00
Will Thompson	Service	01/07/2025	Analyze strategy and coordinate research projects for damages complaint against Whinstone.	2.40	\$1,300.00	\$3,120.00
Will Thompson	Service	01/07/2025	Communicate with bankruptcy counsel and analyze impact of overall bankruptcy process on Whinstone dispute.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	01/07/2025	Communicate with members of LKC case team re research projects and preparation of damages case against Whinstone.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	01/07/2025	Analyze issue re Whinstone contracts and communicate with C. Blackmon re same.	0.80	\$1,300.00	\$1,040.00

Will Thompson	Service	01/07/2025	Analyze strategy re scope of Phase 2 of the motion-to-assume proceedings.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	01/07/2025	Communicate with C. Topping re Whinstone contracts and Whinstone dispute.	0.60	\$1,300.00	\$780.00
Jacob Richards	Service	01/07/2025	Attend LKC team strategy call.	0.30	\$850.00	\$255.00
Jacob Richards	Service	01/07/2025	Communicate with A. Swartz re legal research for damages claim against Whinstone.	0.10	\$850.00	\$85.00
Jacob Richards	Service	01/07/2025	Research legal issue for damages claims against Whinstone.	1.40	\$850.00	\$1,190.00
Andrew Davis	Service	01/07/2025	Communicate internally re strategy and outstanding items.	0.30	\$1,300.00	\$390.00
Todd Disher	Service	01/07/2025	Discuss strategy with LKC firm.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	01/08/2025	Analyze issue re miner delivery and relationship to Whinstone litigation.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	01/08/2025	Analyze strategy for Phase 2 motion-to-assume proceeding.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	01/08/2025	Analyze issues re replacing miners and effect on Whinstone dispute.	1.50	\$1,300.00	\$1,950.00
Alexis Swartz	Service	01/09/2025	Communicate internally regarding potential evidentiary hearing.	0.20	\$1,000.00	\$200.00
Jonathan Cohn	Service	01/09/2025	Calls and emails re Whinstone preventing installation of miners.	1.00	\$1,400.00	\$1,400.00
Will Thompson	Service	01/09/2025	Communicate with J. Stokes re discovery for Phase 2 of motion-to-assume proceedings.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	01/09/2025	Communicate with J. Stokes re case strategy.	0.80	\$1,300.00	\$1,040.00
Will Thompson	Service	01/09/2025	Communicate with client and co-counsel re replacing miners and effect on Whinstone dispute.	1.00	\$1,300.00	\$1,300.00
Will Thompson	Service	01/09/2025	Analyze issues re replacing miners and effect on Whinstone dispute.	0.30	\$1,300.00	\$390.00
Matthew Frederick	Service	01/10/2025	Research Texas law issues.	2.70	\$1,300.00	\$3,510.00
Alexis Swartz	Service	01/10/2025	Prepare for and attend call with N. Miljkovic.	0.50	\$1,000.00	\$500.00
Jonathan Cohn	Service	01/10/2025	Calls and emails re strategy and Riot intransigence.	2.20	\$1,400.00	\$3,080.00
Matthew Frederick	Service	01/10/2025	Communicate with Will Thompson about Texas law questions.	0.20	\$1,300.00	\$260.00
Alexis Swartz	Service	01/10/2025	Communicate regarding Temple miners.	0.20	\$1,000.00	\$200.00
Will Thompson	Service	01/10/2025	Analyze affirmative claims re Whinstone dispute and communicate with M. Frederick re same.	1.10	\$1,300.00	\$1,430.00

Will Thompson	Service	01/10/2025	Communicate with co-counsel re preparation for status conference.	1.00	\$1,300.00	\$1,300.00
Will Thompson	Service	01/10/2025	Communicate with J. Cohn re affirmative claims related to Whinstone dispute.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	01/10/2025	Communicate with client and co-counsel re Whinstone contracts and miner issues.	0.90	\$1,300.00	\$1,170.00
Will Thompson	Service	01/10/2025	Outline points to assist B. Asay with preparation for status conference.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	01/10/2025	Analyze issues re replacement of miners and relationship to Whinstone litigation.	0.30	\$1,300.00	\$390.00
Jacob Richards	Service	01/10/2025	Review Whinstone filing regarding second phase of trial.	0.20	\$850.00	\$170.00
Todd Disher	Service	01/10/2025	Discuss issues with expert witnesses.	0.60	\$1,300.00	\$780.00
Matthew Frederick	Service	01/13/2025	Research Texas law issues.	0.50	\$1,300.00	\$650.00
Alexis Swartz	Service	01/13/2025	Attend status conference.	0.70	\$1,000.00	\$700.00
Jonathan Cohn	Service	01/13/2025	Status conference.	0.70	\$1,400.00	\$980.00
Will Thompson	Service	01/13/2025	Attend status conference regarding scope of Phase 2 of motion-to-assume proceedings.	0.70	\$1,300.00	\$910.00
Jonathan Cohn	Service	01/14/2025	Client calls re strategy.	1.00	\$1,400.00	\$1,400.00
Will Thompson	Service	01/14/2025	Communicate with client and co-counsel re operations issue and relevance to Whinstone dispute.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	01/14/2025	Communicate with client and co-counsel re case strategy and Phase 2 of the motion-to-assume proceedings.	0.60	\$1,300.00	\$780.00
Alexis Swartz	Service	01/15/2025	Legal research for damages claims against Whinstone.	1.80	\$1,000.00	\$1,800.00
Matthew Frederick	Service	01/15/2025	Research Texas law issues.	3.10	\$1,300.00	\$4,030.00
Alexis Swartz	Service	01/16/2025	Legal research for damages claim against Whinstone.	1.70	\$1,000.00	\$1,700.00
Todd Disher	Service	01/16/2025	Begin revising pleading.	1.20	\$1,300.00	\$1,560.00
Will Thompson	Service	01/16/2025	Communicate with T. Disher re draft complaint.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	01/16/2025	Analyze strategy around affirmative claims with M. Frederick.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	01/16/2025	Analyze issues relate to affirmative claims and impact on ongoing Rhodium operations.	1.10	\$1,300.00	\$1,430.00
Alexis Swartz	Service	01/17/2025	Attend call with client regarding bankruptcy plan and circulate notes regarding.	1.50	\$1,000.00	\$1,500.00
Alexis Swartz	Service	01/17/2025	Receive call from J. Shaneyfelt regarding Riot/Whinstone litigation and discuss with T.	0.20	\$1,000.00	\$200.00

Disher and W. Thompson.						
Todd Disher	Service	01/17/2025	Continue revising pleading.	4.10	\$1,300.00	\$5,330.00
Alexis Swartz	Service	01/17/2025	Legal research for claims against Whinstone.	0.50	\$1,000.00	\$500.00
Will Thompson	Service	01/17/2025	Communicate with counsel re Whinstone dispute and Rockdale site.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	01/17/2025	Communicate with A. Swartz re bankruptcy plan and effect on Whinstone dispute.	0.10	\$1,300.00	\$130.00
Jonathan Cohn	Service	01/18/2025	Review Whinstone filing.	0.30	\$1,400.00	\$420.00
Will Thompson	Service	01/20/2025	Review A. Swartz summary and analysis of bankruptcy plan issues and effect on Whinstone dispute.	0.20	\$1,300.00	\$260.00
Andrew Davis	Service	01/20/2025	Communicate internally re experts.	0.30	\$1,300.00	\$390.00
Alexis Swartz	Service	01/21/2025	Revise damages complaint.	1.20	\$1,000.00	\$1,200.00
Alexis Swartz	Service	01/21/2025	Review Whinstone Phase 2 filing and provide comments on response.	1.20	\$1,000.00	\$1,200.00
Jonathan Cohn	Service	01/21/2025	Revise draft briefs.	2.40	\$1,400.00	\$3,360.00
Jonathan Cohn	Service	01/21/2025	Weekly client call.	0.50	\$1,400.00	\$700.00
Todd Disher	Service	01/21/2025	Analyze filings related to scope of Phase 2.	1.10	\$1,300.00	\$1,430.00
Jacob Richards	Service	01/21/2025	Communicate with W. Thompson re research for claims against Whinstone.	0.10	\$850.00	\$85.00
Will Thompson	Service	01/21/2025	Review and revise draft statement re scope of Phase 2.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	01/21/2025	Communicate with client and co-counsel re case strategy.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	01/21/2025	Analyze discovery issues re Phase 2 of motion-to-assume proceedings.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	01/21/2025	Communicate with J. Cohn re case strategy.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	01/21/2025	Coordinate research projects re damages claims against Whinstone.	0.20	\$1,300.00	\$260.00
Alexis Swartz	Service	01/22/2025	Revise damages complaint.	0.60	\$1,000.00	\$600.00
Jacob Richards	Service	01/22/2025	Research legal issue for claims against Whinstone.	1.30	\$850.00	\$1,105.00
Will Thompson	Service	01/22/2025	Communicate with C. Topping re potential witness.	0.30	\$1,300.00	\$390.00
Jonathan Cohn	Service	01/23/2025	Review legal research for claims against Whinstone.	0.50	\$1,400.00	\$700.00
Alexis Swartz	Service	01/23/2025	Communicate internally regarding research for claims against Whinstone.	0.30	\$1,000.00	\$300.00
Alexis Swartz	Service	01/23/2025	Review bankruptcy research and recent	0.30	\$1,000.00	\$300.00

			filings.			
Jacob Richards	Service	01/23/2025	Synthesize case law on legal issue for claims against Whinstone.	0.70	\$850.00	\$595.00
Jacob Richards	Service	01/23/2025	Conduct further research on legal issue for claims against Whinstone.	0.30	\$850.00	\$255.00
Jacob Richards	Service	01/23/2025	Communicate with A. Swartz re legal issue for claims against Whinstone.	0.10	\$850.00	\$85.00
Will Thompson	Service	01/23/2025	Communicate with J. Cohn re case strategy.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	01/23/2025	Communicate with J. Stokes re case strategy.	0.20	\$1,300.00	\$260.00
Alexis Swartz	Service	01/24/2025	Revise damages complaint.	0.20	\$1,000.00	\$200.00
Jonathan Cohn	Service	01/24/2025	Strategy call w outside counsel.	0.30	\$1,400.00	\$420.00
Alexis Swartz	Service	01/24/2025	Attend Rhodium status conference.	1.00	\$1,000.00	\$1,000.00
Will Thompson	Service	01/24/2025	Communicate with co-counsel re hearing on scope of Phase 2 of motion-to-assume proceeding.	1.10	\$1,300.00	\$1,430.00
Will Thompson	Service	01/24/2025	Attend hearing on scope of Phase 2 of motion-to-assume proceeding.	1.00	\$1,300.00	\$1,300.00
Will Thompson	Service	01/24/2025	Analyze Phase 2 issues.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	01/24/2025	Analyze Whinstone position and effect on motion-to-assume proceeding.	0.30	\$1,300.00	\$390.00
Todd Disher	Service	01/24/2025	Attend hearing on scope of phase 2.	1.00	\$1,300.00	\$1,300.00
Todd Disher	Service	01/24/2025	Discuss scope of phase 2.	0.50	\$1,300.00	\$650.00
Jonathan Cohn	Service	01/25/2025	Review draft complaint.	0.50	\$1,400.00	\$700.00
Jacob Richards	Service	01/25/2025	Communicate with W. Thompson re legal research and pending projects.	0.10	\$850.00	\$85.00
Andrew Davis	Service	01/25/2025	Review existing legal research and conduct additional legal research for claims against Whinstone.	2.90	\$1,300.00	\$3,770.00
Will Thompson	Service	01/25/2025	Communicate with J. Richards re research and pending projects.	0.10	\$1,300.00	\$130.00
Alexis Swartz	Service	01/27/2025	Revise damages complaint.	3.50	\$1,000.00	\$3,500.00
Matthew Frederick	Service	01/27/2025	Communicate with Alexis Swartz and Will Thompson about draft complaint.	0.20	\$1,300.00	\$260.00
Jonathan Cohn	Service	01/27/2025	Review draft complaint.	0.20	\$1,400.00	\$280.00
Matthew Frederick	Service	01/27/2025	Communicate with Alexis Swartz about draft complaint.	0.80	\$1,300.00	\$1,040.00
Alexis Swartz	Service	01/27/2025	Discuss damages complaint with L. Brennan.	0.30	\$1,000.00	\$300.00
Jonathan Cohn	Service	01/28/2025	Review and comment on draft complaint, review related contracts, and strategy calls.	3.00	\$1,400.00	\$4,200.00

Alexis Swartz	Service	01/28/2025	Communicate internally regarding damages complaint.	0.40	\$1,000.00	\$400.00
Alexis Swartz	Service	01/28/2025	Discuss legal-research issue with J. Richards.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	01/28/2025	Revise damages complaint.	3.40	\$1,000.00	\$3,400.00
Alexis Swartz	Service	01/28/2025	Attend and take notes for weekly client call.	0.50	\$1,000.00	\$500.00
Jacob Richards	Service	01/28/2025	Communicate with A. Swartz re legal-research issue for damages complaint.	0.40	\$850.00	\$340.00
Jacob Richards	Service	01/28/2025	Review draft of complaint.	0.30	\$850.00	\$255.00
Jacob Richards	Service	01/28/2025	Communicate with Stris/LKC teams re legal-research issue for damages complaint.	0.20	\$850.00	\$170.00
Will Thompson	Service	01/28/2025	Communicate with counsel re discovery and confidentiality issues.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	01/28/2025	Communicate with client and co-counsel re case strategy.	0.90	\$1,300.00	\$1,170.00
Andrew Davis	Service	01/28/2025	Coordinate research issues with A. Swartz.	0.40	\$1,300.00	\$520.00
Andrew Davis	Service	01/28/2025	Research legal issues for damages complaint.	0.30	\$1,300.00	\$390.00
Jonathan Cohn	Service	01/29/2025	Revise complaint.	1.50	\$1,400.00	\$2,100.00
Alexis Swartz	Service	01/29/2025	Revise damages complaint.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	01/29/2025	Discuss revising damages complaint.	0.70	\$1,000.00	\$700.00
Jonathan Cohn	Service	01/29/2025	Call w Stris/LKC re complaint.	0.50	\$1,400.00	\$700.00
Alexis Swartz	Service	01/29/2025	Review discovery and revise damages complaint.	6.00	\$1,000.00	\$6,000.00
Will Thompson	Service	01/29/2025	Communicate with J. Cohn re claims against Whinstone.	0.10	\$1,300.00	\$130.00
Todd Disher	Service	01/29/2025	Discuss strategy with client.	0.50	\$1,300.00	\$650.00
Alexis Swartz	Service	01/30/2025	Discuss legal research with A. Davis to support damages complaint.	0.40	\$1,000.00	\$400.00
Alexis Swartz	Service	01/30/2025	Discuss damages complaint and research tasks with J. Cohn and team.	0.70	\$1,000.00	\$700.00
Jonathan Cohn	Service	01/30/2025	Calls and work on complaint and strategy.	2.70	\$1,400.00	\$3,780.00
Alexis Swartz	Service	01/30/2025	Email client regarding damages expert and complaint.	0.10	\$1,000.00	\$100.00
Alexis Swartz	Service	01/30/2025	Review and analyze Whinstone NDA.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	01/30/2025	Review edits on damages complaint.	0.50	\$1,000.00	\$500.00
Alexis Swartz	Service	01/30/2025	Discuss damages expert with client.	0.50	\$1,000.00	\$500.00
Alexis Swartz	Service	01/30/2025	Review research on counterclaim.	0.20	\$1,000.00	\$200.00

Alexis Swartz	Service	01/30/2025	Attend client discussion re water.	0.70	\$1,000.00	\$700.00
Alexis Swartz	Service	01/30/2025	Revise damages complaint.	2.30	\$1,000.00	\$2,300.00
Alexis Swartz	Service	01/30/2025	Communicate with M. Criner on Rhodium research.	0.30	\$1,000.00	\$300.00
Meredith Criner	Service	01/30/2025	Call with A. Swartz to discuss Rhodium research question.	0.30	\$850.00	\$255.00
Jacob Richards	Service	01/30/2025	Review edits to complaint and feedback from J. Cohn.	0.30	\$850.00	\$255.00
Jacob Richards	Service	01/30/2025	Assemble deposition transcripts and confidentiality designations and send to Stris/LKC teams.	1.10	\$850.00	\$935.00
Will Thompson	Service	01/30/2025	Communicate with client and co-counsel re strategy for damages claims against Whinstone.	0.50	\$1,300.00	\$650.00
Andrew Davis	Service	01/30/2025	Communicate with A. Swartz re research issues.	0.20	\$1,300.00	\$260.00
Alexis Swartz	Service	01/31/2025	Revise damages complaint.	5.80	\$1,000.00	\$5,800.00
Meredith Criner	Service	01/31/2025	Research for complaint.	4.90	\$850.00	\$4,165.00
Jonathan Cohn	Service	01/31/2025	Strategize re complaint and phase 2.	2.00	\$1,400.00	\$2,800.00
Alexis Swartz	Service	01/31/2025	Discuss damages calculations with expert.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	01/31/2025	Attend call with client regarding experts.	0.60	\$1,000.00	\$600.00
Jacob Richards	Service	01/31/2025	Communicate with A Swartz re prior research on relevant Texas causes of action.	0.20	\$850.00	\$170.00
Will Thompson	Service	01/31/2025	Communicate with co-counsel re Whinstone contracts and visitor forms.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	01/31/2025	Communicate with co-counsel re strategy for motion-to-assume proceeding.	0.20	\$1,300.00	\$260.00
Andrew Davis	Service	01/31/2025	Review consulting agreement.	0.20	\$1,300.00	\$260.00

**Quantity Subtotal 124.8**

Time Keeper	Quantity	Rate	Total
Jonathan Cohn	21.3	\$1,400.00	\$29,820.00
Meredith Criner	5.2	\$850.00	\$4,420.00
Andrew Davis	4.9	\$1,300.00	\$6,370.00
Todd Disher	9.5	\$1,300.00	\$12,350.00
Matthew Frederick	7.5	\$1,300.00	\$9,750.00
Jacob Richards	7.1	\$850.00	\$6,035.00



Alexis Swartz	40.1	\$1,000.00	\$40,100.00
Will Thompson	29.2	\$1,300.00	\$37,960.00
<b>Quantity Total</b>			<b>124.8</b>
<b>Subtotal</b>			<b>\$146,805.00</b>
<b>Invoice Discount</b>			<b>20.0%</b>
<i>20% discount (\$29,361.00) off of first \$250k in services.</i>			
<b>Total</b>			<b>\$117,444.00</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1272	12/04/2024	\$47,436.00	\$37,948.80	\$9,487.20
1273	12/05/2024	\$337,239.66	\$270,142.91	\$67,096.75
1327	12/05/2024	\$847,060.41	\$679,284.91	\$167,775.50
1400	01/03/2025	\$737,196.93	\$634,425.97	\$102,770.96
1506	02/27/2025	\$50,536.00	\$0.00	\$50,536.00

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1535	03/12/2025	\$117,444.00	\$0.00	\$117,444.00
<b>Outstanding Balance</b>				<b>\$515,110.41</b>
<b>Total Amount Outstanding</b>				<b>\$515,110.41</b>

**Lehotsky Keller Cohn LLP**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**  
Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**  
200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

# INVOICE

Invoice # 1536  
Date: 02/21/2025  
Due On: 03/12/2025

Invoice Number	Total
1536	\$9,696.00
Subtotal	\$12,120.00
Tax	\$0.00
Amount Due	\$9,696.00

**Lehotsky Keller Cohn LLP****INVOICE**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

Invoice # 1536  
Date: 02/21/2025  
Due On: 03/12/2025

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**00776-Rhodium 30MW LLC****Bankruptcy Fee Application Time**

Attorney	Type	Date	Notes	Quantity	Rate	Total
Jacob Richards	Service	01/07/2025	Draft fourth monthly fee application.	1.10	\$850.00	\$935.00
Jacob Richards	Service	01/13/2025	Communicate with LKC administrative staff re status of December fee application materials.	0.20	\$850.00	\$170.00
Jacob Richards	Service	01/27/2025	Finalize draft of fourth monthly fee application.	0.70	\$850.00	\$595.00
Jacob Richards	Service	01/27/2025	Communicate with W. Thompson, J. Cohn re monthly fee application.	0.10	\$850.00	\$85.00
Jacob Richards	Service	01/28/2025	Communicate with J. Cohn, W. Thompson re fee application status.	0.10	\$850.00	\$85.00
Jacob Richards	Service	01/28/2025	Communicate with bankruptcy counsel re December fee statement filing.	0.30	\$850.00	\$255.00
Jacob Richards	Service	01/28/2025	Communicate with LKC admin staff re December fee statement.	0.20	\$850.00	\$170.00
Jacob Richards	Service	01/28/2025	Serve December fee application and accompanying LEDES data on US Trustee.	0.20	\$850.00	\$170.00
Jacob Richards	Service	01/29/2025	Finish draft of first interim application and accompanying certification.	6.10	\$850.00	\$5,185.00
Jacob Richards	Service	01/29/2025	Communicate with J. Cohn, W. Thompson re interim fee application.	0.20	\$850.00	\$170.00
Jacob Richards	Service	01/29/2025	Communicate with client representatives re December fee statement and November invoice.	0.20	\$850.00	\$170.00
Jonathan Cohn	Service	01/30/2025	Review fee application.	0.40	\$1,400.00	\$560.00
Jacob Richards	Service	01/30/2025	Communicate with J. Cohn, W. Thompson re interim application.	0.20	\$850.00	\$170.00
Jacob Richards	Service	01/30/2025	Communicate with bankruptcy counsel re interim fee application.	0.20	\$850.00	\$170.00
Jacob Richards	Service	01/30/2025	Revise interim fee application.	2.20	\$850.00	\$1,870.00
Jacob Richards	Service	01/31/2025	Revise fee application to implement comments	0.90	\$850.00	\$765.00

from LKC admin team re billing details.						
Jacob Richards	Service	01/31/2025	Communicate with co counsel and LKC admin team re fee application exhibit calculations.	0.40	\$850.00	\$340.00
Jacob Richards	Service	01/31/2025	Call with LKC admin staff re interim fee application edits.	0.30	\$850.00	\$255.00

**Quantity Subtotal 14.0**

Time Keeper	Quantity	Rate	Total
Jonathan Cohn	0.4	\$1,400.00	\$560.00
Jacob Richards	13.6	\$850.00	\$11,560.00

**Quantity Total 14.0**

**Subtotal \$12,120.00**

**Invoice Discount 20.0%**

*20% discount (\$2,424.00) off of first \$250k in services.*

**Total \$9,696.00**

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1328	12/05/2024	\$8,571.50	\$6,857.20	\$1,714.30
1401	01/03/2025	\$9,222.50	\$0.00	\$9,222.50
1507	02/27/2025	\$4,284.00	\$0.00	\$4,284.00

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1536	03/12/2025	\$9,696.00	\$0.00	\$9,696.00

**Outstanding Balance \$24,916.80**

**Total Amount Outstanding \$24,916.80**

**Lehotsky Keller Cohn LLP**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**  
Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**  
200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

# INVOICE

Invoice # 1600  
Date: 03/06/2025  
Due On: 04/05/2025

Invoice Number	Total
1600	\$229,852.75
Subtotal	\$289,604.00
Tax	\$0.00
<b>Amount Due</b>	<b>\$229,852.75</b>

**Lehotsky Keller Cohn LLP****INVOICE**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

Invoice # 1600  
Date: 03/06/2025  
Due On: 04/05/2025

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**00366-Rhodium 30MW LLC****Whinstone Litigation****Services**

Attorney	Type	Date	Notes	Quantity	Rate	Total
Jonathan Cohn	Service	02/01/2025	Revise complaint.	4.00	\$1,400.00	\$5,600.00
Will Thompson	Service	02/01/2025	Analyze issues with Whinstone contracts and visitor forms.	1.20	\$1,300.00	\$1,560.00
Jonathan Cohn	Service	02/02/2025	Revise complaint.	4.00	\$1,400.00	\$5,600.00
Alexis Swartz	Service	02/02/2025	Revise damages complaint and discuss with J. Cohn.	1.80	\$1,000.00	\$1,800.00
Alexis Swartz	Service	02/03/2025	Review research and tasks and communicate internally regarding.	0.40	\$1,000.00	\$400.00
Meredith Criner	Service	02/03/2025	Research for complaint.	2.00	\$850.00	\$1,700.00
Jonathan Cohn	Service	02/03/2025	Calls re strategy and complaint.	1.00	\$1,400.00	\$1,400.00
Alexis Swartz	Service	02/03/2025	Discuss damages complaint and other tasks with internal team.	0.50	\$1,000.00	\$500.00
Alexis Swartz	Service	02/03/2025	Review Riot SEC filings.	0.20	\$1,000.00	\$200.00
Will Thompson	Service	02/03/2025	Analyze potential witness and related issues.	0.90	\$1,300.00	\$1,170.00
Will Thompson	Service	02/03/2025	Communicate with E. Brannen re potential witness.	0.10	\$1,300.00	\$130.00
Andrew Davis	Service	02/03/2025	Analyze issues related to witness.	0.30	\$1,300.00	\$390.00
Alexis Swartz	Service	02/04/2025	Research caselaw related to potential claim.	3.50	\$1,000.00	\$3,500.00
Jonathan Cohn	Service	02/04/2025	Revise scope brief.	1.70	\$1,400.00	\$2,380.00
Alexis Swartz	Service	02/04/2025	Review Rhodium complaint edits.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	02/04/2025	Discuss damages complaint with internal team.	0.30	\$1,000.00	\$300.00
Jonathan Cohn	Service	02/04/2025	Calls re complaint.	2.00	\$1,400.00	\$2,800.00

Alexis Swartz	Service	02/04/2025	Attend client call to discuss litigation.	0.80	\$1,000.00	\$800.00
Alexis Swartz	Service	02/04/2025	Discuss internally case management and bankruptcy complaint.	0.40	\$1,000.00	\$400.00
Alexis Swartz	Service	02/04/2025	Discuss damages complaint with W. Thompson and J. Cohn.	0.30	\$1,000.00	\$300.00
Alexis Swartz	Service	02/04/2025	Revise damages complaint.	1.40	\$1,000.00	\$1,400.00
Jacob Richards	Service	02/04/2025	Review comments from bankruptcy counsel re revisions to complaint.	0.30	\$850.00	\$255.00
Jacob Richards	Service	02/04/2025	Discuss complaint research with A. Swartz.	0.10	\$850.00	\$85.00
Will Thompson	Service	02/04/2025	Analyze and revise draft reply brief re scope of Phase 2 of motion-to-assume proceedings.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	02/04/2025	Analyze claim against Whinstone with A. Swartz.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	02/04/2025	Analyze draft complaint against Whinstone.	0.70	\$1,300.00	\$910.00
Will Thompson	Service	02/04/2025	Analyze issues re third-party discovery of Rhodium facilities.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	02/04/2025	Communicate with client and co-counsel re case strategy.	1.60	\$1,300.00	\$2,080.00
Alexis Swartz	Service	02/05/2025	Research relevant law and revise damages complaint.	3.80	\$1,000.00	\$3,800.00
Jonathan Cohn	Service	02/05/2025	Correspondence re complaint and review same.	2.50	\$1,400.00	\$3,500.00
Meredith Criner	Service	02/05/2025	Research for complaint.	3.40	\$850.00	\$2,890.00
Alexis Swartz	Service	02/05/2025	Research and summarize caselaw on potential claim.	1.20	\$1,000.00	\$1,200.00
Alexis Swartz	Service	02/05/2025	Discuss damages complaint with W. Thompson and J. Cohn.	0.50	\$1,000.00	\$500.00
Alexis Swartz	Service	02/05/2025	Analyze damages issues.	1.30	\$1,000.00	\$1,300.00
Alexis Swartz	Service	02/05/2025	Communicate internally regarding damages complaint.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	02/05/2025	Review documents related to water.	0.50	\$1,000.00	\$500.00
Will Thompson	Service	02/05/2025	Communicate with J. Cohn and A. Swartz re strategy for and preparation of damages complaint.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	02/05/2025	Review and revise draft damages complaint.	1.80	\$1,300.00	\$2,340.00
Alexis Swartz	Service	02/06/2025	Review research and bankruptcy docket and communicate internally regarding same.	1.10	\$1,000.00	\$1,100.00
Alexis Swartz	Service	02/06/2025	Revise damages complaint.	2.10	\$1,000.00	\$2,100.00
Jonathan Cohn	Service	02/06/2025	Revise complaint.	5.00	\$1,400.00	\$7,000.00

Todd Disher	Service	02/06/2025	Analyze draft complaint.	0.90	\$1,300.00	\$1,170.00
Will Thompson	Service	02/06/2025	Analyze issues related to damages claims.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	02/06/2025	Analyze issues related to witnesses for Whinstone dispute.	1.60	\$1,300.00	\$2,080.00
Jonathan Cohn	Service	02/07/2025	Calls re and revisions to complaint and damages.	4.50	\$1,400.00	\$6,300.00
Michele Somboon	Service	02/07/2025	Cite check and proofread damages complaint.	2.60	\$500.00	\$1,300.00
Alexis Swartz	Service	02/07/2025	Discuss damages calculation with internal team.	0.40	\$1,000.00	\$400.00
Alexis Swartz	Service	02/07/2025	Discuss case with damages expert and confer with internal team regarding same.	0.90	\$1,000.00	\$900.00
Alexis Swartz	Service	02/07/2025	Communicate with client and outside counsel regarding expert retention.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	02/07/2025	Revise damages complaint.	0.20	\$1,000.00	\$200.00
Todd Disher	Service	02/07/2025	Discuss issues related to damages.	0.80	\$1,300.00	\$1,040.00
Todd Disher	Service	02/07/2025	Discuss strategic issues with clients.	0.80	\$1,300.00	\$1,040.00
Will Thompson	Service	02/07/2025	Analyze issues related to witnesses for Whinstone dispute.	1.60	\$1,300.00	\$2,080.00
Will Thompson	Service	02/07/2025	Communicate with client and co-counsel re draft damages complaint.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	02/07/2025	Communicate with co-counsel re revisions to draft damages complaint.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	02/07/2025	Analyze damages issues.	0.70	\$1,300.00	\$910.00
Will Thompson	Service	02/07/2025	Communicate with damages expert and co-counsel re damages analysis.	0.90	\$1,300.00	\$1,170.00
Will Thompson	Service	02/07/2025	Analyze damages claim against Whinstone.	1.20	\$1,300.00	\$1,560.00
Will Thompson	Service	02/07/2025	Communicate with client and co-counsel re damages complaint.	1.20	\$1,300.00	\$1,560.00
Jonathan Cohn	Service	02/08/2025	Work on complaint and strategy.	4.80	\$1,400.00	\$6,720.00
Alexis Swartz	Service	02/08/2025	Communicate internally regarding damages complaint.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	02/08/2025	Research pre and post judgment interest rates.	1.10	\$1,000.00	\$1,100.00
Alexis Swartz	Service	02/08/2025	Revise damages complaint.	0.30	\$1,000.00	\$300.00
Jacob Richards	Service	02/08/2025	Clean up and circulate revised draft of damages complaint.	0.30	\$850.00	\$255.00
Will Thompson	Service	02/08/2025	Analyze and communicate re issues related to witnesses for Whinstone dispute.	1.20	\$1,300.00	\$1,560.00



Will Thompson	Service	02/08/2025	Analyze potential claim against Whinstone.	0.20	\$1,300.00	\$260.00
Alexis Swartz	Service	02/09/2025	Review docket for special committee documents.	0.10	\$1,000.00	\$100.00
Alexis Swartz	Service	02/09/2025	Revise damages complaint.	1.30	\$1,000.00	\$1,300.00
Jonathan Cohn	Service	02/09/2025	Calls and correspondence re complaint, related documents, and strategy.	2.50	\$1,400.00	\$3,500.00
Will Thompson	Service	02/09/2025	Analyze potential claim against Whinstone.	0.20	\$1,300.00	\$260.00
Alexis Swartz	Service	02/10/2025	Revise damages complaint and communicate internally regarding same.	0.30	\$1,000.00	\$300.00
Alexis Swartz	Service	02/10/2025	Revise damages complaint and prepare for filing.	1.90	\$1,000.00	\$1,900.00
Alexis Swartz	Service	02/10/2025	Communicate internally regarding upcoming deadlines and case tasks.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	02/10/2025	Discuss damages complaint edits with client.	0.10	\$1,000.00	\$100.00
Alexis Swartz	Service	02/10/2025	Review caselaw on potential claim.	0.90	\$1,000.00	\$900.00
Alexis Swartz	Service	02/10/2025	Review interim order on Phase II.	0.50	\$1,000.00	\$500.00
Alexis Swartz	Service	02/10/2025	Discuss Phase II planning with Stris team.	0.70	\$1,000.00	\$700.00
Alexis Swartz	Service	02/10/2025	Communicate internally regarding case strategy and tasks.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	02/10/2025	Draft press release related to damages complaint.	0.60	\$1,000.00	\$600.00
Jonathan Cohn	Service	02/10/2025	Work on amended complaint and strategic issues.	3.00	\$1,400.00	\$4,200.00
Alexis Swartz	Service	02/10/2025	Review damages spreadsheet.	0.80	\$1,000.00	\$800.00
Alexis Swartz	Service	02/10/2025	Review documents related to potential claim.	1.40	\$1,000.00	\$1,400.00
Todd Disher	Service	02/10/2025	Analyze and discuss scope of Phase 2 in light of Court's order.	1.80	\$1,300.00	\$2,340.00
Will Thompson	Service	02/10/2025	Analyze issues re potential witnesses for Whinstone dispute.	1.10	\$1,300.00	\$1,430.00
Will Thompson	Service	02/10/2025	Analyze potential claims against Whinstone.	1.70	\$1,300.00	\$2,210.00
Will Thompson	Service	02/10/2025	Review and analyze court order re scope of Phase 2.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	02/10/2025	Analyze potential production.	0.20	\$1,300.00	\$260.00
Jacob Richards	Service	02/10/2025	Review interim order on Phase 2.	0.60	\$850.00	\$510.00
Alexis Swartz	Service	02/11/2025	Review caselaw related to potential claim.	2.60	\$1,000.00	\$2,600.00
Alexis Swartz	Service	02/11/2025	Discuss complaint with P. Brody.	0.10	\$1,000.00	\$100.00
Alexis Swartz	Service	02/11/2025	Communicate internally regarding damages complaint and damages.	0.40	\$1,000.00	\$400.00

Alexis Swartz	Service	02/11/2025	Prepare complaint for filing.	1.70	\$1,000.00	\$1,700.00
Alexis Swartz	Service	02/11/2025	Research law on exemplary damages	0.30	\$1,000.00	\$300.00
Alexis Swartz	Service	02/11/2025	Attend in firm call to discuss damages.	1.60	\$1,000.00	\$1,600.00
Todd Disher	Service	02/11/2025	Discuss claims with litigation team.	1.50	\$1,300.00	\$1,950.00
Alexis Swartz	Service	02/11/2025	Discuss damages complaint and exhibit filing with P. Brody.	0.30	\$1,000.00	\$300.00
Alexis Swartz	Service	02/11/2025	Review documents related to potential claim.	0.50	\$1,000.00	\$500.00
Alexis Swartz	Service	02/11/2025	Attend client call to discuss complaint and damages.	1.10	\$1,000.00	\$1,100.00
Jonathan Cohn	Service	02/11/2025	Calls and emails re complaint and damages	5.00	\$1,400.00	\$7,000.00
Will Thompson	Service	02/11/2025	Develop damages claims.	4.50	\$1,300.00	\$5,850.00
Will Thompson	Service	02/11/2025	Prepare for Phase 2 hearing.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	02/11/2025	Communicate with client and co-counsel re case strategy.	1.30	\$1,300.00	\$1,690.00
Alexis Swartz	Service	02/12/2025	Review and communicate regarding filed damages complaint.	0.80	\$1,000.00	\$800.00
Alexis Swartz	Service	02/12/2025	Communicate internally regarding complaint filing.	0.10	\$1,000.00	\$100.00
Jonathan Cohn	Service	02/12/2025	Calls/emails re damages.	1.50	\$1,400.00	\$2,100.00
Alexis Swartz	Service	02/12/2025	Review and analyze invoice spreadsheet.	0.50	\$1,000.00	\$500.00
Alexis Swartz	Service	02/12/2025	Review documents related to potential claim.	2.10	\$1,000.00	\$2,100.00
Alexis Swartz	Service	02/12/2025	Review expert retention agreement and communicate internally regarding same.	0.20	\$1,000.00	\$200.00
Jonathan Cohn	Service	02/12/2025	Calls and emails re privilege and strategy.	3.50	\$1,400.00	\$4,900.00
Will Thompson	Service	02/12/2025	Prepare for mediation.	0.80	\$1,300.00	\$1,040.00
Will Thompson	Service	02/12/2025	Communicate with client re Whinstone litigation.	1.40	\$1,300.00	\$1,820.00
Will Thompson	Service	02/12/2025	Analyze Whinstone litigation strategy.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	02/12/2025	Communicate with client and co-counsel re Whinstone litigation.	1.00	\$1,300.00	\$1,300.00
Alexis Swartz	Service	02/13/2025	Review and analyze invoices on Phase II and communicate regarding same.	1.30	\$1,000.00	\$1,300.00
Alexis Swartz	Service	02/13/2025	Review documents related to potential claim.	0.50	\$1,000.00	\$500.00
Alexis Swartz	Service	02/13/2025	Communicate internally regarding privilege issues.	0.40	\$1,000.00	\$400.00
Alexis Swartz	Service	02/13/2025	Research and summarize privilege issues.	5.60	\$1,000.00	\$5,600.00
Alexis Swartz	Service	02/13/2025	Communicate with Stris and internal team	0.20	\$1,000.00	\$200.00

regarding Phase II.						
Jonathan Cohn	Service	02/13/2025	Correspondence re settlement and damages.	3.00	\$1,400.00	\$4,200.00
Will Thompson	Service	02/13/2025	Analyze privilege issues.	1.30	\$1,300.00	\$1,690.00
Alexis Swartz	Service	02/14/2025	Review documents relevant to mediation.	0.10	\$1,000.00	\$100.00
Alexis Swartz	Service	02/14/2025	Research and summarize privilege issues.	6.80	\$1,000.00	\$6,800.00
Alexis Swartz	Service	02/14/2025	Discuss privilege research with J. Cohn and W. Thompson.	0.60	\$1,000.00	\$600.00
Alexis Swartz	Service	02/14/2025	Research Whinstone agent for service.	0.10	\$1,000.00	\$100.00
Alexis Swartz	Service	02/14/2025	Review mediation statement.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	02/14/2025	Revise privilege memo.	0.40	\$1,000.00	\$400.00
Jonathan Cohn	Service	02/14/2025	Review settlement memo and correspondence re strategy and privilege.	2.00	\$1,400.00	\$2,800.00
Will Thompson	Service	02/14/2025	Analyze privilege issues.	1.50	\$1,300.00	\$1,950.00
Will Thompson	Service	02/14/2025	Prepare for mediation.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	02/14/2025	Review and analyze draft mediation statement.	0.40	\$1,300.00	\$520.00
Will Thompson	Service	02/14/2025	Analyze strategy for Phase 2 hearing.	0.20	\$1,300.00	\$260.00
Alexis Swartz	Service	02/15/2025	Revise privilege memo.	3.20	\$1,000.00	\$3,200.00
Jonathan Cohn	Service	02/15/2025	Comment on research memo.	0.50	\$1,400.00	\$700.00
Will Thompson	Service	02/15/2025	Analyze privilege issues.	0.80	\$1,300.00	\$1,040.00
Jonathan Cohn	Service	02/16/2025	Correspondence re strategy and mediation.	1.00	\$1,400.00	\$1,400.00
Will Thompson	Service	02/16/2025	Attend and participate in client meeting re mediation and Whinstone dispute.	2.40	\$1,300.00	\$3,120.00
Will Thompson	Service	02/16/2025	Prepare for mediation with co-counsel.	0.40	\$1,300.00	\$520.00
Jonathan Cohn	Service	02/17/2025	Meet and confer, and prep; review opp to Whinstone motion; internal strategy call,	3.00	\$1,400.00	\$4,200.00
Will Thompson	Service	02/17/2025	Analyze case strategy.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	02/17/2025	Analyze and revise objection to Whinstone's claims.	2.30	\$1,300.00	\$2,990.00
Alexis Swartz	Service	02/18/2025	Discuss upcoming Phase II hearing internally and with Cocounsel.	0.90	\$1,000.00	\$900.00
Alexis Swartz	Service	02/18/2025	Communicate with cocounsel regarding invoices.	0.10	\$1,000.00	\$100.00
Alexis Swartz	Service	02/18/2025	Communicate internally regarding upcoming cases tasks and research.	0.30	\$1,000.00	\$300.00
Alexis Swartz	Service	02/18/2025	Review adversary proceeding docket and local and federal bankruptcy rules.	1.00	\$1,000.00	\$1,000.00

Alexis Swartz	Service	02/18/2025	Review and analyze Phase II spreadsheets and invoices.	0.70	\$1,000.00	\$700.00
Alexis Swartz	Service	02/18/2025	Register for filing and communicate with cocounsel regarding same.	0.30	\$1,000.00	\$300.00
Alexis Swartz	Service	02/18/2025	Review documents related to potential claim.	2.60	\$1,000.00	\$2,600.00
Jonathan Cohn	Service	02/18/2025	Pre-mediation strategy call and prep work.	1.00	\$1,400.00	\$1,400.00
Todd Disher	Service	02/18/2025	Communicate about upcoming hearing with J. Stokes, W. Thompson, and A. Swartz.	1.10	\$1,300.00	\$1,430.00
Todd Disher	Service	02/18/2025	Begin to prepare for Phase 2 trial.	2.30	\$1,300.00	\$2,990.00
Jonathan Cohn	Service	02/18/2025	Travel related to mediation.	2.00	\$700.00	\$1,400.00
Will Thompson	Service	02/18/2025	Prepare for mediation.	1.70	\$1,300.00	\$2,210.00
Alexis Swartz	Service	02/19/2025	Communicate internally and with cocounsel regarding adversary case and bankruptcy proceeding.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	02/19/2025	Revise Motion in limine on Phase 2.	3.10	\$1,000.00	\$3,100.00
Alexis Swartz	Service	02/19/2025	Discuss Phase 2 hearing with T. Disher.	0.50	\$1,000.00	\$500.00
Alexis Swartz	Service	02/19/2025	Review expert witness retention agreement.	0.30	\$1,000.00	\$300.00
Alexis Swartz	Service	02/19/2025	Review documents in preparation for Phase II hearing.	0.70	\$1,000.00	\$700.00
Alexis Swartz	Service	02/19/2025	Review Whinstone motion for continuance.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	02/19/2025	Review witness's previous testimony.	0.40	\$1,000.00	\$400.00
Jonathan Cohn	Service	02/19/2025	Mediation; revise briefs and orders.	11.00	\$1,400.00	\$15,400.00
Todd Disher	Service	02/19/2025	Prepare for Phase 2 hearing.	1.80	\$1,300.00	\$2,340.00
Will Thompson	Service	02/19/2025	Attend mediation.	8.10	\$1,300.00	\$10,530.00
Alexis Swartz	Service	02/20/2025	Communicate internally and with cocounsel regarding bankruptcy proceeding and adversary case.	0.60	\$1,000.00	\$600.00
Alexis Swartz	Service	02/20/2025	Discuss hearing and adversary proceeding with T. Disher.	0.10	\$1,000.00	\$100.00
Alexis Swartz	Service	02/20/2025	Review final MIL Filing.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	02/20/2025	Review and compile research.	0.40	\$1,000.00	\$400.00
Alexis Swartz	Service	02/20/2025	Research and summarize caselaw relevant to potential claim.	2.60	\$1,000.00	\$2,600.00
Alexis Swartz	Service	02/20/2025	Review opposition to motion for continuance.	0.10	\$1,000.00	\$100.00
Alexis Swartz	Service	02/20/2025	Communicate with clerk's office regarding filing permissions.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	02/20/2025	Research caselaw relevant to adversary proceeding.	0.50	\$1,000.00	\$500.00

Jonathan Cohn	Service	02/20/2025	Calls re mediation/offer.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	02/20/2025	Travel related to mediation.	2.00	\$700.00	\$1,400.00
Will Thompson	Service	02/20/2025	Travel from mediation in Dallas back to office in Austin.	3.00	\$650.00	\$1,950.00
Will Thompson	Service	02/20/2025	Analyze Phase 2 issues, including draft correspondence to opposing counsel re potential agreement and revise draft response to Whinstone's motion to continue.	1.60	\$1,300.00	\$2,080.00
Will Thompson	Service	02/20/2025	Communicate with co-counsel re draft proposed order re motion to assume.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	02/20/2025	Communicate with J. Cohn re next steps.	0.10	\$1,300.00	\$130.00
Jacob Richards	Service	02/20/2025	Communicate with A. Swartz re abstention research.	0.10	\$850.00	\$85.00
Alexis Swartz	Service	02/21/2025	Attend bankruptcy status conference.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	02/21/2025	Call clerk and prepare notices of appearance.	0.50	\$1,000.00	\$500.00
Alexis Swartz	Service	02/21/2025	Research and summarize justifiable reliance under Texas law.	2.30	\$1,000.00	\$2,300.00
Alexis Swartz	Service	02/21/2025	Research and summarize caselaw related to offensive claim.	0.70	\$1,000.00	\$700.00
Alexis Swartz	Service	02/21/2025	Research caselaw relevant to adversary proceeding.	1.80	\$1,000.00	\$1,800.00
Alexis Swartz	Service	02/24/2025	Review bankruptcy appeal rules.	0.10	\$1,000.00	\$100.00
Alexis Swartz	Service	02/24/2025	Discuss discovery and case tasks for adversary proceeding with cocounsel.	1.10	\$1,000.00	\$1,100.00
Alexis Swartz	Service	02/24/2025	Communicate internally regarding adversary proceeding.	0.10	\$1,000.00	\$100.00
Jonathan Cohn	Service	02/24/2025	Emails and calls re mediation.	1.00	\$1,400.00	\$1,400.00
Alexis Swartz	Service	02/24/2025	Discuss adversary case discovery with W. Thompson.	0.10	\$1,000.00	\$100.00
Will Thompson	Service	02/24/2025	Review order on motion to assume.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	02/24/2025	Communicate with co-counsel re discovery for affirmative claims.	0.40	\$1,300.00	\$520.00
Alexis Swartz	Service	02/25/2025	Communicate with damages expert.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	02/25/2025	Communicate internally regarding case strategy and tasks.	0.40	\$1,000.00	\$400.00
Alexis Swartz	Service	02/25/2025	Review bankruptcy rules re appeal.	0.40	\$1,000.00	\$400.00
Alexis Swartz	Service	02/25/2025	Research potential defenses to claims.	0.70	\$1,000.00	\$700.00
Alexis Swartz	Service	02/25/2025	Communicate with clerk's office regarding filing permission in adversary proceeding.	0.40	\$1,000.00	\$400.00

Alexis Swartz	Service	02/25/2025	Communicate with cocounsel regarding damages documents.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	02/25/2025	Discuss filing in adversary case and document collection with cocounsel.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	02/25/2025	Attend call with client to discuss case updates.	0.50	\$1,000.00	\$500.00
Jonathan Cohn	Service	02/25/2025	Emails and calls re mediation strategy.	1.00	\$1,400.00	\$1,400.00
Will Thompson	Service	02/25/2025	Communicate with client and co-counsel re mediation and case strategy.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	02/25/2025	Analyze issue related to relationship of proceedings in different fora; communicate with B. Asay re same.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	02/25/2025	Analyze mediation issues.	0.90	\$1,300.00	\$1,170.00
Alexis Swartz	Service	02/26/2025	Review bankruptcy fee statements.	0.40	\$1,000.00	\$400.00
Alexis Swartz	Service	02/27/2025	File notices of appearance.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	02/27/2025	Review information and communicate regarding Whinstone's appeal.	0.60	\$1,000.00	\$600.00
Alexis Swartz	Service	02/27/2025	Review local rules re filing notices of appearance for bankruptcy appeal.	0.30	\$1,000.00	\$300.00
Alexis Swartz	Service	02/27/2025	Review Judge's local rules in bankruptcy appeal.	0.20	\$1,000.00	\$200.00
Jonathan Cohn	Service	02/27/2025	Review securities-fraud suit	0.80	\$1,400.00	\$1,120.00
Will Thompson	Service	02/27/2025	Communicate with E. Brannen re affirmative claims.	0.20	\$1,300.00	\$260.00
Jacob Richards	Service	02/27/2025	Review background materials for Whinstone's appeal.	0.30	\$850.00	\$255.00
				<b>Quantity Subtotal</b>		<b>245.6</b>
				<b>Services Subtotal</b>		<b>\$289,005.00</b>

## Expenses

Type	Attorney	Date	Notes	Quantity	Rate	Total
Expense	Loretta Howard	02/18/2025	E110 Out-of-town travel: Hotel expenses for W. Thompson re mediation.	1.00	\$329.00	\$329.00
Expense	Loretta Howard	02/18/2025	E110 Out-of-town travel: Vonlane (motor coach) expense for W. Thompson re mediation.	1.00	\$270.00	\$270.00
				<b>Expenses Subtotal</b>		<b>\$599.00</b>

Time Keeper	Quantity	Rate	Total
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Jonathan Cohn	69.8	\$1,400.00	\$97,720.00
Jonathan Cohn	4.0	\$700.00	\$2,800.00
Meredith Criner	5.4	\$850.00	\$4,590.00
Andrew Davis	0.3	\$1,300.00	\$390.00
Todd Disher	11.0	\$1,300.00	\$14,300.00
Jacob Richards	1.7	\$850.00	\$1,445.00
Michele Somboon	2.6	\$500.00	\$1,300.00
Alexis Swartz	92.1	\$1,000.00	\$92,100.00
Will Thompson	55.7	\$1,300.00	\$72,410.00
Will Thompson	3.0	\$650.00	\$1,950.00

**Quantity Total 245.6**

**Subtotal \$289,604.00**

**Invoice Discount \$59,751.25**

*20% discount (\$50k) off of first \$250k in services. 25% discount (\$9,751.25) for next \$250k in services.*

**Total \$229,852.75**

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1272	12/04/2024	\$47,436.00	\$37,948.80	\$9,487.20
1273	12/05/2024	\$337,239.66	\$270,142.91	\$67,096.75
1327	12/05/2024	\$847,060.41	\$679,284.91	\$167,775.50
1400	01/03/2025	\$737,196.93	\$634,425.97	\$102,770.96
1506	02/27/2025	\$50,536.00	\$40,428.80	\$10,107.20
1535	03/12/2025	\$117,444.00	\$0.00	\$117,444.00

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1600	04/05/2025	\$229,852.75	\$0.00	\$229,852.75

**Outstanding Balance \$704,534.36**

**Total Amount Outstanding \$704,534.36**

**Lehotsky Keller Cohn LLP**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**  
Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**  
200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

# INVOICE

Invoice # 1601  
Date: 03/06/2025  
Due On: 04/05/2025

Invoice Number	Total
1601	\$11,805.00
Subtotal	\$15,740.00
Tax	\$0.00
<b>Amount Due</b>	<b>\$11,805.00</b>



**Lehotsky Keller Cohn LLP****INVOICE**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

Invoice # 1601  
Date: 03/06/2025  
Due On: 04/05/2025

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**00776-Rhodium 30MW LLC****Bankruptcy Fee Application Time**

Attorney	Type	Date	Notes	Quantity	Rate	Total
Jacob Richards	Service	02/03/2025	Communicate with LKC administrative team re billing rate data for interim application.	0.40	\$850.00	\$340.00
Jacob Richards	Service	02/03/2025	Revise interim application.	0.50	\$850.00	\$425.00
Will Thompson	Service	02/10/2025	Review Rhodium fee application.	0.20	\$1,300.00	\$260.00
Jacob Richards	Service	02/10/2025	Communicate with J. Cohn, W. Thompson re draft interim fee application.	0.30	\$850.00	\$255.00
Jacob Richards	Service	02/10/2025	Finalize interim fee app and exhibits for filing.	1.60	\$850.00	\$1,360.00
Jacob Richards	Service	02/10/2025	Communicate with bankruptcy counsel re interim fee app filing.	0.30	\$850.00	\$255.00
Jacob Richards	Service	02/17/2025	Call with J. Cohn, W. Thompson regarding contingency issue.	0.40	\$850.00	\$340.00
Jacob Richards	Service	02/17/2025	Research contingency issue.	1.80	\$850.00	\$1,530.00
Jacob Richards	Service	02/17/2025	Communicate with J. Cohn, W. Thompson re research findings on contingency issue.	0.20	\$850.00	\$170.00
Jonathan Cohn	Service	02/20/2025	Draft declaration.	0.50	\$1,400.00	\$700.00
Jacob Richards	Service	02/20/2025	Follow up with J. Cohn re contingency and retention issues.	0.40	\$850.00	\$340.00
Jacob Richards	Service	02/20/2025	Communicate with J. Cohn and LKC admin staff re cumulative discount and updated retention filing.	0.30	\$850.00	\$255.00
Jacob Richards	Service	02/20/2025	Draft declaration in support of updated retention filing.	1.30	\$850.00	\$1,105.00
Jonathan Cohn	Service	02/21/2025	Revise declaration; emails re same.	0.50	\$1,400.00	\$700.00
Jacob Richards	Service	02/21/2025	Draft January monthly fee application.	1.10	\$850.00	\$935.00
Jacob Richards	Service	02/21/2025	Communicate with LKC admin staff re January invoices.	0.30	\$850.00	\$255.00

Jacob Richards	Service	02/21/2025	Revise January fee app, communicate with W. Thompson re same.	0.70	\$850.00	\$595.00
Jacob Richards	Service	02/21/2025	Communicate with bankruptcy counsel re monthly fee app filing and service.	0.20	\$850.00	\$170.00
Jacob Richards	Service	02/21/2025	Serve January fee app and LEDES data on U.S. Trustee.	0.20	\$850.00	\$170.00
Jacob Richards	Service	02/21/2025	Draft retention motion.	0.60	\$850.00	\$510.00
Jacob Richards	Service	02/21/2025	Communicate with J. Cohn, W. Thompson re retention motion.	0.20	\$850.00	\$170.00
Jonathan Cohn	Service	02/24/2025	Calls and emails re retention letter.	1.00	\$1,400.00	\$1,400.00
Jonathan Cohn	Service	02/26/2025	Calls and emails re retention.	1.50	\$1,400.00	\$2,100.00
Jonathan Cohn	Service	02/27/2025	Calls re retention.	1.00	\$1,400.00	\$1,400.00

**Quantity Subtotal 15.5**

Time Keeper	Quantity	Rate	Total
Jonathan Cohn	4.5	\$1,400.00	\$6,300.00
Jacob Richards	10.8	\$850.00	\$9,180.00
Will Thompson	0.2	\$1,300.00	\$260.00

**Quantity Total 15.5**

**Subtotal \$15,740.00**

**Invoice Discount 25.0%**

*25% discount (\$3,935.00) off second \$250k in services.*

**Total \$11,805.00**

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1328	12/05/2024	\$8,571.50	\$6,857.20	\$1,714.30
1401	01/03/2025	\$9,222.50	\$0.00	\$9,222.50
1507	02/27/2025	\$4,284.00	\$3,427.20	\$856.80
1536	03/12/2025	\$9,696.00	\$0.00	\$9,696.00

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1601	04/05/2025	\$11,805.00	\$0.00	\$11,805.00
Outstanding Balance				\$33,294.60
Total Amount Outstanding				\$33,294.60

# Lehotsky Keller Cohn LLP

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

# INVOICE

Invoice # 1648  
Date: 04/10/2025  
Due On: 05/10/2025

Invoice Number	Total
1648	\$32,819.03
Subtotal	\$39,313.03
Tax	\$0.00
<b>Amount Due</b>	<b>\$32,819.03</b>

**Lehotsky Keller Cohn LLP****INVOICE**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

Invoice # 1648  
Date: 04/10/2025  
Due On: 05/10/2025

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**00366-Rhodium 30MW LLC****Whinstone Litigation****Services**

Attorney	Type	Date	Notes	Quantity	Rate	Total
Alexis Swartz	Service	03/03/2025	Review local admissions rules for bankruptcy appeal and communicate with team regarding same.	0.30	\$1,000.00	\$300.00
Alexis Swartz	Service	03/03/2025	Communicate internally regarding case tasks and items to do.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	03/04/2025	Attend client update call.	0.60	\$1,000.00	\$600.00
Alexis Swartz	Service	03/05/2025	Review financial spreadsheets for expert.	0.40	\$1,000.00	\$400.00
Will Thompson	Service	03/05/2025	Communicate with J. Stokes re Whinstone dispute and relationship to operations on site.	0.20	\$1,300.00	\$260.00
Jonathan Cohn	Service	03/06/2025	Calls re litigation strategy.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	03/06/2025	Review briefs.	0.50	\$1,400.00	\$700.00
Will Thompson	Service	03/06/2025	Analyze relationship between Whinstone motion to withdraw reference and motion-to-assume proceedings.	0.70	\$1,300.00	\$910.00
Andrew Davis	Service	03/06/2025	Review and comment on omnibus objection to claims.	1.10	\$1,300.00	\$1,430.00
Jonathan Cohn	Service	03/07/2025	Review and edit brief.	0.50	\$1,400.00	\$700.00
Alexis Swartz	Service	03/11/2025	Review Whinstone record designations.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	03/11/2025	Communicate internally regarding upcoming case deadlines and tasks.	0.20	\$1,000.00	\$200.00
Will Thompson	Service	03/11/2025	Communicate with client and co-counsel re case updates and strategy.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	03/11/2025	Communicate with co-counsel re contracts with Whinstone.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	03/11/2025	Communicate with co-counsel re bond issue.	0.20	\$1,300.00	\$260.00

Andrew Davis	Service	03/11/2025	Review correspondence re record requests.	0.40	\$1,300.00	\$520.00
Alexis Swartz	Service	03/12/2025	Review question on energizing contracts.	0.30	\$1,000.00	\$300.00
Will Thompson	Service	03/12/2025	Communicate with J. Stokes re Whinstone contracts.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	03/12/2025	Communicate with A. Herbert re preparation of motion related to bond issue.	0.10	\$1,300.00	\$130.00
Ari Herbert	Service	03/13/2025	Prepare joint motion for release of cash deposit, declaration ISO same, and proposed order, and conduct research re: same.	4.10	\$1,000.00	\$4,100.00
Will Thompson	Service	03/13/2025	Communicate with co-counsel re SAFE issues.	0.70	\$1,300.00	\$910.00
Will Thompson	Service	03/13/2025	Communicate with A. Herbert re motion related to bond issue.	0.20	\$1,300.00	\$260.00
Alexis Swartz	Service	03/17/2025	Communicate internally regarding upcoming case tasks.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	03/17/2025	Prepare notice of appearance.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	03/17/2025	Review and revise draft motion to release bond.	0.80	\$1,000.00	\$800.00
Jonathan Cohn	Service	03/17/2025	Review Whinstone MTD.	0.50	\$1,400.00	\$700.00
Alexis Swartz	Service	03/17/2025	Review Whinstone MTD.	0.60	\$1,000.00	\$600.00
Alexis Swartz	Service	03/17/2025	Research Texas law re statute of limitations.	0.40	\$1,000.00	\$400.00
Alexis Swartz	Service	03/17/2025	Review motion to withdraw the reference.	0.30	\$1,000.00	\$300.00
Alexis Swartz	Service	03/17/2025	Review Riot MTD and motion to withdraw the reference.	0.50	\$1,000.00	\$500.00
Will Thompson	Service	03/17/2025	Analyze and revise draft state-court motion re deposit in lieu of bond.	0.80	\$1,300.00	\$1,040.00
Jonathan Cohn	Service	03/18/2025	Review Riot/Whinstone filings.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	03/18/2025	Calls and correspondence re resolution and next steps.	1.50	\$1,400.00	\$2,100.00
Will Thompson	Service	03/18/2025	Analyze draft term sheet.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	03/18/2025	Communicate with J. Stokes re settlement issues.	0.50	\$1,300.00	\$650.00
Will Thompson	Service	03/18/2025	Communicate with client and co-counsel re settlement issues.	0.80	\$1,300.00	\$1,040.00
Jonathan Cohn	Service	03/21/2025	Review settlement-related documents; correspondence re Akin/discovery requests.	0.80	\$1,400.00	\$1,120.00
Alexis Swartz	Service	03/21/2025	Review settlement agreement.	0.20	\$1,000.00	\$200.00
Alexis Swartz	Service	03/21/2025	Attend call regarding settlement term sheet.	1.00	\$1,000.00	\$1,000.00
Alexis Swartz	Service	03/21/2025	Discuss settlement with co-counsel.	0.30	\$1,000.00	\$300.00
Alexis Swartz	Service	03/21/2025	Review press release re settlement.	0.10	\$1,000.00	\$100.00

Alexis Swartz	Service	03/21/2025	Communicate internally regarding bankruptcy settlement.	0.20	\$1,000.00	\$200.00
Will Thompson	Service	03/25/2025	Communicate with client and co-counsel re settlement progress and case strategy.	0.30	\$1,300.00	\$390.00
Will Thompson	Service	03/26/2025	Analyze past expert analysis to address C. Topping question.	0.40	\$1,300.00	\$520.00
Andrew Davis	Service	03/26/2025	Discuss settlement issue with W. Thompson.	0.10	\$1,300.00	\$130.00
Jonathan Cohn	Service	03/29/2025	Revise timeline and summary of fee dispute.	3.20	\$1,400.00	\$4,480.00
Jonathan Cohn	Service	03/31/2025	Correspondence re hearings and mediation.	0.30	\$1,400.00	\$420.00
				<b>Quantity Subtotal</b>		<b>26.9</b>
				<b>Services Subtotal</b>		<b>\$32,470.00</b>

**Expenses**

Type	Attorney	Date	Notes	Quantity	Rate	Total
Expense	Jonathan Cohn	02/21/2025	E110 Out-of-town travel: Hotel expense in Dallas for J. Cohn.	1.00	\$1,112.57	\$1,112.57
Expense	Jonathan Cohn	02/24/2025	E110 Out-of-town travel: Travel expense (airfare) to Dallas for J. Cohn.	1.00	\$854.96	\$854.96
Expense	Jonathan Cohn	03/31/2025	Porter Hedges LLP - March 2025 Professional Services (Invoice 576076)	1.00	\$4,875.50	\$4,875.50
				<b>Expenses Subtotal</b>		<b>\$6,843.03</b>

Time Keeper	Quantity	Rate	Total
Jonathan Cohn	8.3	\$1,400.00	\$11,620.00
Andrew Davis	1.6	\$1,300.00	\$2,080.00
Ari Herbert	4.1	\$1,000.00	\$4,100.00
Alexis Swartz	7.0	\$1,000.00	\$7,000.00
Will Thompson	5.9	\$1,300.00	\$7,670.00
		<b>Quantity Total</b>	<b>26.9</b>
		<b>Subtotal</b>	<b>\$39,313.03</b>
		<b>Invoice Discount</b>	<b>\$6,494.00</b>
		<i>20% discount (\$6,494.00) off of first \$250k in services.</i>	
		<b>Total</b>	<b>\$32,819.03</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1506	02/27/2025	\$50,536.00	\$40,428.80	\$10,107.20
1535	03/12/2025	\$117,444.00	\$93,955.20	\$23,488.80
1600	04/05/2025	\$229,852.75	\$184,002.00	\$45,850.75
1694	06/12/2025	\$69,622.07	\$0.00	\$69,622.07
1782	08/10/2025	\$73,897.55	\$0.00	\$73,897.55
1809	08/21/2025	\$59,489.86	\$0.00	\$59,489.86

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1648	05/10/2025	\$32,819.03	\$0.00	\$32,819.03
Outstanding Balance				\$315,275.26
Total Amount Outstanding				\$315,275.26



## Remittance Advice

### Payment Information

**Remit checks to:** LEHOTSKY KELLER COHN LLP  
200 Massachusetts Avenue, NW Suite 700  
Washington DC 20001

Please include the invoice number 1648 as an additional reference so we may accurately identify and apply your payment.

**Lehotsky Keller Cohn LLP**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**  
Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**  
200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

# INVOICE

Invoice # 1649  
Date: 04/10/2025  
Due On: 05/10/2025

Invoice Number	Total
1649	\$10,772.00
Subtotal	\$13,465.00
Tax	\$0.00
<b>Amount Due</b>	<b>\$10,772.00</b>

**Lehotsky Keller Cohn LLP****INVOICE**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

Invoice # 1649  
Date: 04/10/2025  
Due On: 05/10/2025

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**00776-Rhodium 30MW LLC****Bankruptcy Fee Application Time**

Attorney	Type	Date	Notes	Quantity	Rate	Total
Jonathan Cohn	Service	03/01/2025	Calls re retention application and engagement letter.	1.00	\$1,400.00	\$1,400.00
Jacob Richards	Service	03/07/2025	Communicate with J. Cohn, W. Thompson, LKC admin staff re order granting interim compensation.	0.30	\$850.00	\$255.00
Jacob Richards	Service	03/07/2025	Communicate with LKC administrative staff re February invoices.	0.40	\$850.00	\$340.00
Jacob Richards	Service	03/07/2025	Draft February monthly fee application.	1.00	\$850.00	\$850.00
Jacob Richards	Service	03/11/2025	Continue drafting February fee application.	1.60	\$850.00	\$1,360.00
Jacob Richards	Service	03/12/2025	Revise February fee application.	0.30	\$850.00	\$255.00
Jacob Richards	Service	03/12/2025	Communicate with LKC admin staff re February fee application.	0.10	\$850.00	\$85.00
Jacob Richards	Service	03/13/2025	Finalize February fee application for filing.	0.80	\$850.00	\$680.00
Jacob Richards	Service	03/14/2025	Communicate with W. Thompson re February fee application.	0.10	\$850.00	\$85.00
Jacob Richards	Service	03/14/2025	Update February fee app and send to bankruptcy counsel for filing.	0.30	\$850.00	\$255.00
Jacob Richards	Service	03/26/2025	Draft second interim quarterly fee application.	1.50	\$850.00	\$1,275.00
Jacob Richards	Service	03/27/2025	Continue drafting second interim quarterly fee application.	1.30	\$850.00	\$1,105.00
Jonathan Cohn	Service	03/28/2025	review objection to retention agreement, strategize response, and calls re same.	2.00	\$1,400.00	\$2,800.00
Jacob Richards	Service	03/28/2025	Communicate with W. Thompson re retention objection.	0.20	\$850.00	\$170.00
Jacob Richards	Service	03/28/2025	Prepare timeline relevant to retention objection.	2.20	\$850.00	\$1,870.00
Jacob Richards	Service	03/29/2025	Communicate with J. Cohn, W. Thompson, T. Disher, A. Swartz re retention objection.	0.40	\$850.00	\$340.00

Jacob Richards	Service	03/31/2025	Revise timeline relevant to retention objection and correspond with counsel regarding the same.	0.40	\$850.00	\$340.00
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**Quantity Subtotal 13.9**

Time Keeper	Quantity	Rate	Total
Jonathan Cohn	3.0	\$1,400.00	\$4,200.00
Jacob Richards	10.9	\$850.00	\$9,265.00

**Quantity Total 13.9**

**Subtotal \$13,465.00**

**Invoice Discount 20.0%**

*20% discount (\$2,693.00) off of first \$250k in services.*

**Total \$10,772.00**

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1507	02/27/2025	\$4,284.00	\$3,427.20	\$856.80
1536	03/12/2025	\$9,696.00	\$7,756.80	\$1,939.20
1601	04/05/2025	\$11,805.00	\$9,444.00	\$2,361.00
1695	06/12/2025	\$33,872.00	\$0.00	\$33,872.00
1791	08/10/2025	\$35,928.00	\$0.00	\$35,928.00

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1649	05/10/2025	\$10,772.00	\$0.00	\$10,772.00
<b>Outstanding Balance</b>				<b>\$85,729.00</b>
<b>Total Amount Outstanding</b>				<b>\$85,729.00</b>

## Remittance Advice

### Payment Information

**Remit checks to:** LEHOTSKY KELLER COHN LLP  
200 Massachusetts Avenue, NW Suite 700  
Washington DC 20001

Please include the invoice number 1649 as an additional reference so we may accurately identify and apply your payment.

**Lehotsky Keller Cohn LLP**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**  
Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**  
200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

# INVOICE

Invoice # 1694  
Date: 05/14/2025  
Due On: 06/12/2025

Invoice Number	Total
1694	\$69,622.07
Subtotal	\$71,304.07
Tax	\$0.00
<b>Amount Due</b>	<b>\$69,622.07</b>

**Lehotsky Keller Cohn LLP****INVOICE**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

Invoice # 1694  
Date: 05/14/2025  
Due On: 06/12/2025

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**00366-Rhodium 30MW LLC****Whinstone Litigation****Services**

Attorney	Type	Date	Notes	Quantity	Rate	Total
Jonathan Cohn	Service	04/01/2025	Client call re response brief and strategy.	0.30	\$1,400.00	\$420.00
Alexis Swartz	Service	04/04/2025	Draft and revise proposed ordres re Milam County bond.	0.40	\$1,000.00	\$400.00
Will Thompson	Service	04/04/2025	Review and comment on draft settlement agreement.	0.60	\$1,300.00	\$780.00
Will Thompson	Service	04/04/2025	Communicate with co-counsel re edits to draft settlement agreement.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	04/06/2025	Communicate with P. Tomasco re settlement agreement and Milam County deposit.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	04/07/2025	Analyze and revise draft joint motion and proposed order re injunction bond in Milam County.	0.50	\$1,300.00	\$650.00
Jonathan Cohn	Service	04/08/2025	Client strategy call.	0.70	\$1,400.00	\$980.00
Alexis Swartz	Service	04/10/2025	Draft notices of dismissal and nonsuit.	0.80	\$1,000.00	\$800.00
Will Thompson	Service	04/10/2025	Analyze and revise draft motions and proposed orders necessary to effectuate settlement of Whinstone dispute.	0.80	\$1,300.00	\$1,040.00
Will Thompson	Service	04/15/2025	Communicate with client and co-counsel re settlement issues.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	04/22/2025	Communicate with client and co-counsel re settlement issues.	0.40	\$1,300.00	\$520.00
Alexis Swartz	Service	04/24/2025	Review draft dismissal order filings.	0.20	\$1,000.00	\$200.00
Will Thompson	Service	04/24/2025	Analyze draft filings attached to settlement agreement; communicate with co-counsel re same.	0.40	\$1,300.00	\$520.00
Alexis Swartz	Service	04/28/2025	Prepare and file motion for return of bond in	0.30	\$1,000.00	\$300.00

Milam County.						
Will Thompson	Service	04/28/2025	Communicate with co-counsel re dismissal filings required by the settlement with Whinstone.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	04/28/2025	Review and approve filings required by the settlement with Whinstone.	0.10	\$1,300.00	\$130.00
Alexis Swartz	Service	04/29/2025	Finalize and file return of bond in Milam County.	0.50	\$1,000.00	\$500.00
Will Thompson	Service	04/29/2025	Work to retrieve deposit in lieu of bond from Milam County clerk.	0.20	\$1,300.00	\$260.00
Will Thompson	Service	04/30/2025	Communicate with C. Topping re deposit in lieu of bond in Milam County.	0.20	\$1,300.00	\$260.00
				<b>Quantity Subtotal</b>		<b>6.9</b>
				<b>Services Subtotal</b>		<b>\$8,410.00</b>

### Expenses

Type	Attorney	Date	Notes	Quantity	Rate	Total
Expense	Jonathan Cohn	04/30/2025	Porter Hedges LLP - April 2025 Professional Services (Invoice 577424)	1.00	\$62,894.07	\$62,894.07
				<b>Expenses Subtotal</b>		<b>\$62,894.07</b>

Time Keeper	Quantity	Rate	Total
Jonathan Cohn	1.0	\$1,400.00	\$1,400.00
Alexis Swartz	2.2	\$1,000.00	\$2,200.00
Will Thompson	3.7	\$1,300.00	\$4,810.00
		<b>Quantity Total</b>	<b>6.9</b>
		<b>Subtotal</b>	<b>\$71,304.07</b>
		<b>Invoice Discount</b>	<b>\$1,682.00</b>
<i>20% discount (\$1,682.00) off of first \$250k in services.</i>			
		<b>Total</b>	<b>\$69,622.07</b>

### Detailed Statement of Account

#### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1506	02/27/2025	\$50,536.00	\$40,428.80	\$10,107.20



1535	03/12/2025	\$117,444.00	\$93,955.20	\$23,488.80
1600	04/05/2025	\$229,852.75	\$184,002.00	\$45,850.75
1648	05/10/2025	\$32,819.03	\$0.00	\$32,819.03
1782	08/10/2025	\$73,897.55	\$0.00	\$73,897.55
1809	08/21/2025	\$59,489.86	\$0.00	\$59,489.86

**Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1694	06/12/2025	\$69,622.07	\$0.00	\$69,622.07

**Outstanding Balance \$315,275.26****Total Amount Outstanding \$315,275.26**

## Remittance Advice

### Payment Information

**Remit checks to:** LEHOTSKY KELLER COHN LLP  
200 Massachusetts Avenue, NW Suite 700  
Washington DC 20001

Please include the invoice number 1694 as an additional reference so we may accurately identify and apply your payment.

**Lehotsky Keller Cohn LLP**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**  
Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**  
200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

# INVOICE

Invoice # 1695  
Date: 05/14/2025  
Due On: 06/12/2025

Invoice Number	Total
1695	\$33,872.00
Subtotal	\$42,340.00
Tax	\$0.00
<b>Amount Due</b>	<b>\$33,872.00</b>

**Lehotsky Keller Cohn LLP****INVOICE**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

Invoice # 1695  
Date: 05/14/2025  
Due On: 06/12/2025

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**00776-Rhodium 30MW LLC****Bankruptcy Fee Application Time**

Attorney	Type	Date	Notes	Quantity	Rate	Total
Jonathan Cohn	Service	04/01/2025	Calls and emails re retention.	0.50	\$1,400.00	\$700.00
Will Thompson	Service	04/01/2025	Communicate with client and co-counsel re retention application.	0.40	\$1,300.00	\$520.00
Jacob Richards	Service	04/01/2025	Discuss contingency fee issue with J. Cohn; review objection to retention application; research applicable bankruptcy rules.	2.60	\$850.00	\$2,210.00
Jacob Richards	Service	04/04/2025	Communicate with J. Cohn re objection to contingency.	0.10	\$850.00	\$85.00
Jacob Richards	Service	04/04/2025	Communciate with LKC admin staff re feb fee app filing date.	0.20	\$850.00	\$170.00
Jacob Richards	Service	04/10/2025	Communicate with LKC admin staff re March invoices.	0.20	\$850.00	\$170.00
Jonathan Cohn	Service	04/12/2025	Calls re retention	0.50	\$1,400.00	\$700.00
Jacob Richards	Service	04/12/2025	Draft March fee application.	1.30	\$850.00	\$1,105.00
Jacob Richards	Service	04/13/2025	Proofread and revise March fee application.	0.30	\$850.00	\$255.00
Jonathan Cohn	Service	04/14/2025	Calls and emails re retention.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	04/15/2025	Review brief re retention.	0.30	\$1,400.00	\$420.00
Jonathan Cohn	Service	04/16/2025	Revise brief re retention; calls and emails re same.	2.00	\$1,400.00	\$2,800.00
Jonathan Cohn	Service	04/17/2025	Revise briefs re retention and extension.	2.20	\$1,400.00	\$3,080.00
Jacob Richards	Service	04/17/2025	Finalize March fee statement; communicate with W. Thompson re same.	0.50	\$850.00	\$425.00
Jonathan Cohn	Service	04/18/2025	Revise reply brief.	3.00	\$1,400.00	\$4,200.00
Jonathan Cohn	Service	04/21/2025	Revise reply brief; and revise discovery requests.	1.80	\$1,400.00	\$2,520.00
Alexis Swartz	Service	04/22/2025	Review bankruptcy fee application filings and	0.50	\$1,000.00	\$500.00

draft brief.

Jonathan Cohn	Service	04/22/2025	Call w Debtor and Stris re retention; work on drafts; review Akin brief and correspondence re same.	2.40	\$1,400.00	\$3,360.00
Jonathan Cohn	Service	04/23/2025	Court status conference; and confer w J Stokes re next steps.	0.70	\$1,400.00	\$980.00
Alexis Swartz	Service	04/23/2025	Review briefing on retention application and begin research of additional caselaw.	0.80	\$1,000.00	\$800.00
Jonathan Cohn	Service	04/23/2025	Calls re retention issues.	1.80	\$1,400.00	\$2,520.00
Alexis Swartz	Service	04/24/2025	Research caselaw on fee application and summarize findings.	4.90	\$1,000.00	\$4,900.00
Jonathan Cohn	Service	04/24/2025	Draft retention brief and calls re same.	2.50	\$1,400.00	\$3,500.00
Alexis Swartz	Service	04/25/2025	Research and summarize caselaw on retention/ fee application.	1.10	\$1,000.00	\$1,100.00
Jonathan Cohn	Service	04/28/2025	Calls re retention.	1.50	\$1,400.00	\$2,100.00
Jonathan Cohn	Service	04/30/2025	Revise filing on retention, and correspondence re same.	1.80	\$1,400.00	\$2,520.00

**Quantity Subtotal 34.4**

Time Keeper	Quantity	Rate	Total
Jonathan Cohn	21.5	\$1,400.00	\$30,100.00
Jacob Richards	5.2	\$850.00	\$4,420.00
Alexis Swartz	7.3	\$1,000.00	\$7,300.00
Will Thompson	0.4	\$1,300.00	\$520.00

**Quantity Total 34.4**

**Subtotal \$42,340.00**

**Invoice Discount \$8,468.00**

*20% discount (\$8,468.00) off of first \$250k in services.*

**Total \$33,872.00**

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1507	02/27/2025	\$4,284.00	\$3,427.20	\$856.80

1536	03/12/2025	\$9,696.00	\$7,756.80	\$1,939.20
1601	04/05/2025	\$11,805.00	\$9,444.00	\$2,361.00
1649	05/10/2025	\$10,772.00	\$0.00	\$10,772.00
1791	08/10/2025	\$35,928.00	\$0.00	\$35,928.00

**Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1695	06/12/2025	\$33,872.00	\$0.00	\$33,872.00

**Outstanding Balance \$85,729.00****Total Amount Outstanding \$85,729.00**

## Remittance Advice

### Payment Information

**Remit checks to:** LEHOTSKY KELLER COHN LLP  
200 Massachusetts Avenue, NW Suite 700  
Washington DC 20001

Please include the invoice number 1695 as an additional reference so we may accurately identify and apply your payment.

**Lehotsky Keller Cohn LLP**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**  
Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**  
200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

# INVOICE

Invoice # 1782  
Date: 07/11/2025  
Due On: 08/10/2025

Invoice Number	Total
1782	\$73,897.55
Subtotal	\$74,161.55
Tax	\$0.00
<b>Amount Due</b>	<b>\$73,897.55</b>



**Lehotsky Keller Cohn LLP****INVOICE**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

Invoice # 1782  
Date: 07/11/2025  
Due On: 08/10/2025

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**00366-Rhodium 30MW LLC****Whinstone Litigation****Services**

Attorney	Type	Date	Notes	Quantity	Rate	Total
Alexis Swartz	Service	05/06/2025	Finalize and file Milam county dismissal papers.	0.40	\$1,000.00	\$400.00
Alexis Swartz	Service	05/07/2025	Finalize and file Milam county dismissal papers.	0.40	\$1,000.00	\$400.00
Will Thompson	Service	05/28/2025	Communicate with C. Topping re deposit in lieu of bond in Milam County.	0.10	\$1,300.00	\$130.00
Will Thompson	Service	05/29/2025	Work to retrieve deposit in lieu of bond in Milam County.	0.30	\$1,300.00	\$390.00
				<b>Quantity Subtotal</b>		<b>1.2</b>
				<b>Services Subtotal</b>		<b>\$1,320.00</b>

**Expenses**

Type	Attorney	Date	Notes	Quantity	Rate	Total
Expense	Jonathan Cohn	05/31/2025	Porter Hedges LLP - May 2025 Professional Services (Invoice 578703)	1.00	\$72,841.55	\$72,841.55
				<b>Expenses Subtotal</b>		<b>\$72,841.55</b>

Time Keeper	Quantity	Rate	Total
Alexis Swartz	0.8	\$1,000.00	\$800.00
Will Thompson	0.4	\$1,300.00	\$520.00
		<b>Quantity Total</b>	<b>1.2</b>
		<b>Subtotal</b>	<b>\$74,161.55</b>
		<b>Invoice Discount</b>	<b>\$264.00</b>

20% discount (\$264.00) off of first \$250k in services.

**Total      \$73,897.55****Detailed Statement of Account****Other Invoices**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1506	02/27/2025	\$50,536.00	\$40,428.80	\$10,107.20
1535	03/12/2025	\$117,444.00	\$93,955.20	\$23,488.80
1600	04/05/2025	\$229,852.75	\$184,002.00	\$45,850.75
1648	05/10/2025	\$32,819.03	\$0.00	\$32,819.03
1694	06/12/2025	\$69,622.07	\$0.00	\$69,622.07

**Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1782	08/10/2025	\$73,897.55	\$0.00	\$73,897.55

**Outstanding Balance      \$255,785.40**  
**Total Amount Outstanding      \$255,785.40**

## Remittance Advice

### Payment Information

**Remit checks to:** LEHOTSKY KELLER COHN LLP  
200 Massachusetts Avenue, NW Suite 700  
Washington DC 20001

Please include the invoice number 1782 as an additional reference so we may accurately identify and apply your payment.

**Lehotsky Keller Cohn LLP**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**  
Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**  
200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

# INVOICE

Invoice # 1791  
Date: 07/11/2025  
Due On: 08/10/2025

Invoice Number	Total
1791	\$35,928.00
Subtotal	\$44,910.00
Tax	\$0.00
Amount Due	\$35,928.00

**Lehotsky Keller Cohn LLP****INVOICE**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

Invoice # 1791  
Date: 07/11/2025  
Due On: 08/10/2025

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**00776-Rhodium 30MW LLC****Bankruptcy Fee Application Time**

Attorney	Type	Date	Notes	Quantity	Rate	Total
Jonathan Cohn	Service	05/01/2025	Calls re retention issues.	0.50	\$1,400.00	\$700.00
Will Thompson	Service	05/02/2025	Communications re updated retention application and related discovery.	0.20	\$1,300.00	\$260.00
Alexis Swartz	Service	05/06/2025	Review and analyze draft reply retention brief.	0.30	\$1,000.00	\$300.00
Jonathan Cohn	Service	05/06/2025	Correspondence re retention.	1.20	\$1,400.00	\$1,680.00
Will Thompson	Service	05/06/2025	Review and revise brief re updated retention application.	0.30	\$1,300.00	\$390.00
Jonathan Cohn	Service	05/07/2025	Calls and review retention brief.	1.50	\$1,400.00	\$2,100.00
Jonathan Cohn	Service	05/08/2025	Revise fee brief.	2.50	\$1,400.00	\$3,500.00
Jonathan Cohn	Service	05/10/2025	Revise retention brief.	3.00	\$1,400.00	\$4,200.00
Alexis Swartz	Service	05/12/2025	Revise and edit reply in support of fee application.	3.60	\$1,000.00	\$3,600.00
Jacob Richards	Service	05/12/2025	Communicate with W. Thompson re April invoices.	0.10	\$850.00	\$85.00
Alexis Swartz	Service	05/13/2025	Prepare for and attend hearing related to Ad Hoc SAFE objections.	0.70	\$1,000.00	\$700.00
Jonathan Cohn	Service	05/13/2025	Review of and correspondence re brief in support of Debtors' retention application.	1.70	\$1,400.00	\$2,380.00
Jacob Richards	Service	05/14/2025	Communicate with LKC admin staff re March fee application.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	05/14/2025	Review reply in support of updated retention application and find additional caselaw.	1.60	\$1,000.00	\$1,600.00
Jonathan Cohn	Service	05/14/2025	Revise fee brief and calls re same.	1.30	\$1,400.00	\$1,820.00
Jacob Richards	Service	05/14/2025	Revise March fee statement; communicate with W. Thompson re same.	0.20	\$850.00	\$170.00
Jacob Richards	Service	05/14/2025	Revise second interim fee application.	0.30	\$850.00	\$255.00

Jacob Richards	Service	05/14/2025	Draft April fee statement.	0.80	\$850.00	\$680.00
Jacob Richards	Service	05/14/2025	Communicate with LKC admin staff re April invoices and fee statement.	0.40	\$850.00	\$340.00
Alexis Swartz	Service	05/16/2025	Draft Nathan 2004 deposition outline.	0.90	\$1,000.00	\$900.00
Alexis Swartz	Service	05/16/2025	Review deposition testimony and caselaw relevant to privilege in fee dispute.	1.70	\$1,000.00	\$1,700.00
Jonathan Cohn	Service	05/17/2025	Calls re retention hearing.	0.70	\$1,400.00	\$980.00
Jonathan Cohn	Service	05/19/2025	Calls re retention hearing and continuance.	0.50	\$1,400.00	\$700.00
Alexis Swartz	Service	05/20/2025	Discuss SAFE discovery requests with J. Cohn.	0.20	\$1,000.00	\$200.00
Jacob Richards	Service	05/20/2025	Communicate with S. Lehotsky, J. Cohn, W. Thompson re fee applications.	0.20	\$850.00	\$170.00
Jacob Richards	Service	05/20/2025	Communicate with LKC admin staff re fee applications.	0.20	\$850.00	\$170.00
Alexis Swartz	Service	05/21/2025	Draft RFP and Rogs on SAFEs related to Debtors' updated retention application.	1.00	\$1,000.00	\$1,000.00
Will Thompson	Service	05/21/2025	Analyze and revise interim fee application.	0.90	\$1,300.00	\$1,170.00
Jonathan Cohn	Service	05/21/2025	Calls and emails re monthly fee submissions.	0.50	\$1,400.00	\$700.00
Jacob Richards	Service	05/21/2025	Communicate with LKC admin staff re prior fee applications.	0.40	\$850.00	\$340.00
Jacob Richards	Service	05/21/2025	Revise draft of second interim fee application.	3.60	\$850.00	\$3,060.00
Jacob Richards	Service	05/21/2025	Revise March and April monthly fee statements.	1.30	\$850.00	\$1,105.00
Jacob Richards	Service	05/21/2025	Communicate with W. Thompson, J. Cohn re fee applications.	0.90	\$850.00	\$765.00
Alexis Swartz	Service	05/22/2025	Draft RFP and Rogs on SAFEs related to Debtors' updated retention application.	0.70	\$1,000.00	\$700.00
Jonathan Cohn	Service	05/22/2025	Review and revise discovery on SAFEs related to Debtors' updated retention application.	0.30	\$1,400.00	\$420.00
Jonathan Cohn	Service	05/23/2025	Review and revise discovery on SAFEs related to Debtors' updated retention application.	0.30	\$1,400.00	\$420.00
Jonathan Cohn	Service	05/23/2025	Calls and strategy re updated retention application.	1.50	\$1,400.00	\$2,100.00
Alexis Swartz	Service	05/28/2025	Strategy call re updated retention application and related SAFE discovery.	1.00	\$1,000.00	\$1,000.00
Jonathan Cohn	Service	05/28/2025	Strategy calls re support of Debtors' updated retention application.	1.70	\$1,400.00	\$2,380.00
Quantity Subtotal						38.9
Time Keeper				Quantity	Rate	Total

Jonathan Cohn	17.2	\$1,400.00	\$24,080.00
Jacob Richards	8.6	\$850.00	\$7,310.00
Alexis Swartz	11.7	\$1,000.00	\$11,700.00
Will Thompson	1.4	\$1,300.00	\$1,820.00
<b>Quantity Total</b>			<b>38.9</b>
<b>Subtotal</b>			<b>\$44,910.00</b>
<b>Invoice Discount</b>			<b>\$8,982.00</b>
<i>20% discount (\$8,982.00) off of first \$250k in services.</i>			
<b>Total</b>			<b>\$35,928.00</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1507	02/27/2025	\$4,284.00	\$3,427.20	\$856.80
1536	03/12/2025	\$9,696.00	\$7,756.80	\$1,939.20
1601	04/05/2025	\$11,805.00	\$9,444.00	\$2,361.00
1649	05/10/2025	\$10,772.00	\$0.00	\$10,772.00
1695	06/12/2025	\$33,872.00	\$0.00	\$33,872.00

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1791	08/10/2025	\$35,928.00	\$0.00	\$35,928.00
<b>Outstanding Balance</b>				<b>\$85,729.00</b>
<b>Total Amount Outstanding</b>				<b>\$85,729.00</b>

## Remittance Advice

### Payment Information

**Remit checks to:** LEHOTSKY KELLER COHN LLP  
200 Massachusetts Avenue, NW Suite 700  
Washington DC 20001

Please include the invoice number 1791 as an additional reference so we may accurately identify and apply your payment.



**Lehotsky Keller Cohn LLP**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**  
Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**  
200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

# INVOICE

Invoice # 1809  
Date: 07/22/2025  
Due On: 08/21/2025

Invoice Number	Total
1809	\$59,489.86
Subtotal	\$59,489.86
Tax	\$0.00
<b>Amount Due</b>	<b>\$59,489.86</b>

**Lehotsky Keller Cohn LLP****INVOICE**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

Invoice # 1809  
Date: 07/22/2025  
Due On: 08/21/2025

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**00366-Rhodium 30MW LLC****Whinstone Litigation**

Type	Attorney	Date	Notes	Quantity	Rate	Total
Expense	Jonathan Cohn	06/30/2025	Porter Hedges LLP - June 2025 Professional Services (Invoice 579846)	1.00	\$59,489.86	\$59,489.86

Time Keeper	Quantity	Rate	Total
		<b>Subtotal</b>	<b>\$59,489.86</b>
		<b>Total</b>	<b>\$59,489.86</b>

**Detailed Statement of Account****Other Invoices**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1506	02/27/2025	\$50,536.00	\$40,428.80	\$10,107.20
1535	03/12/2025	\$117,444.00	\$93,955.20	\$23,488.80
1600	04/05/2025	\$229,852.75	\$184,002.00	\$45,850.75
1648	05/10/2025	\$32,819.03	\$0.00	\$32,819.03
1694	06/12/2025	\$69,622.07	\$0.00	\$69,622.07
1782	08/10/2025	\$73,897.55	\$0.00	\$73,897.55

**Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1809	08/21/2025	\$59,489.86	\$0.00	\$59,489.86
<b>Outstanding Balance</b>				<b>\$315,275.26</b>

**Total Amount Outstanding      \$315,275.26**

## Remittance Advice

### Payment Information

**Remit checks to:** LEHOTSKY KELLER COHN LLP  
200 Massachusetts Avenue, NW Suite 700  
Washington DC 20001

Please include the invoice number 1809 as an additional reference so we may accurately identify and apply your payment.

**Lehotsky Keller Cohn LLP**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

**Invoice To:**  
Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**Payable To:**  
200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

# INVOICE

Invoice # 1810  
Date: 07/22/2025  
Due On: 08/21/2025

Invoice Number	Total
1810	\$31,649.07
Subtotal	\$38,899.07
Tax	\$0.00
Amount Due	\$31,649.07

**Lehotsky Keller Cohn LLP****INVOICE**

200 Massachusetts Avenue, NW Suite 700  
Washington, District of Columbia 20001

Invoice # 1810  
Date: 07/22/2025  
Due On: 08/21/2025

Rhodium 30MW LLC  
4146 W US Highway 79  
Rockdale, TX 76567

**00776-Rhodium 30MW LLC****Bankruptcy Fee Application Time****Services**

Attorney	Type	Date	Notes	Quantity	Rate	Total
Jonathan Cohn	Service	06/02/2025	Attend deposition of C Topping	3.00	\$1,400.00	\$4,200.00
Jonathan Cohn	Service	06/02/2025	Hearing prep re retention app.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	06/03/2025	Hearing prep re retention app.	0.50	\$1,400.00	\$700.00
Jonathan Cohn	Service	06/04/2025	Prep for hearing and attend hearing.	8.00	\$1,400.00	\$11,200.00
Will Thompson	Service	06/04/2025	Prepare for and attend hearing re updated retention application.	3.70	\$1,300.00	\$4,810.00
Todd Disher	Service	06/04/2025	Prepare for and attend hearing on retention application.	3.70	\$1,300.00	\$4,810.00
Will Thompson	Service	06/08/2025	Research and analyze arguments for supporting debtors' updated retention application.	1.10	\$1,300.00	\$1,430.00
Jonathan Cohn	Service	06/09/2025	Revise brief supporting Debtor on revise fee application.	4.50	\$1,400.00	\$6,300.00
Jonathan Cohn	Service	06/10/2025	Revise brief.	1.50	\$1,400.00	\$2,100.00
				<b>Quantity Subtotal</b>		<b>26.5</b>
				<b>Services Subtotal</b>		<b>\$36,250.00</b>

**Expenses**

Type	Attorney	Date	Notes	Quantity	Rate	Total
Expense	Loretta Howard	06/02/2025	E110 Out-of-town travel: Airline expense for J. Cohn re travel to Houston, TX.	1.00	\$1,549.37	\$1,549.37
Expense	Loretta Howard	06/03/2025	E110 Out-of-town travel: Lyft charges for J. Cohn re travel to Houston, TX.	1.00	\$111.33	\$111.33

Expense	Loretta Howard	06/04/2025	E110 Out-of-town travel: Lyft charges for J. Cohn re travel to Houston, TX.	1.00	\$15.23	\$15.23
Expense	Loretta Howard	06/05/2025	E110 Out-of-town travel: Lyft expense for J. Cohn re travel to Houston, TX.	1.00	\$81.29	\$81.29
Expense	Loretta Howard	06/05/2025	E110 Out-of-town travel: Lyft expense for J. Cohn re travel to Houston, TX.	1.00	\$131.23	\$131.23
Expense	Loretta Howard	06/05/2025	E110 Out-of-town travel: Hotel expense for J. Cohn re travel to Houston, TX.	1.00	\$750.62	\$750.62
Expense	Loretta Howard	06/05/2025	E110 Out-of-town travel: WiFi expense for J. Cohn re travel to Houston, TX.	1.00	\$10.00	\$10.00
<b>Expenses Subtotal</b>						<b>\$2,649.07</b>

Time Keeper	Quantity	Rate	Total
Jonathan Cohn	18.0	\$1,400.00	\$25,200.00
Todd Disher	3.7	\$1,300.00	\$4,810.00
Will Thompson	4.8	\$1,300.00	\$6,240.00
<b>Quantity Total</b>			<b>26.5</b>
<b>Subtotal</b>			<b>\$38,899.07</b>
<b>Invoice Discount</b>			<b>\$7,250.00</b>
<i>20% discount (\$7,250) off of first \$250k in services.</i>			
<b>Total</b>			<b>\$31,649.07</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1507	02/27/2025	\$4,284.00	\$3,427.20	\$856.80
1536	03/12/2025	\$9,696.00	\$7,756.80	\$1,939.20
1601	04/05/2025	\$11,805.00	\$9,444.00	\$2,361.00
1649	05/10/2025	\$10,772.00	\$0.00	\$10,772.00
1695	06/12/2025	\$33,872.00	\$0.00	\$33,872.00
1791	08/10/2025	\$35,928.00	\$0.00	\$35,928.00

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1810	08/21/2025	\$31,649.07	\$0.00	\$31,649.07
Outstanding Balance				\$117,378.07
Total Amount Outstanding				\$117,378.07



## Remittance Advice

### Payment Information

**Remit checks to:** LEHOTSKY KELLER COHN LLP  
200 Massachusetts Avenue, NW Suite 700  
Washington DC 20001

Please include the invoice number 1810 as an additional reference so we may accurately identify and apply your payment.

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

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

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

(Relates to Docket No. \_\_\_\_\_)

The Court Considered Lehotsky Keller Cohn LLP’s *Second and Final Application for Payment of Compensation and Reimbursement of Expenses for the Period August 28 through June 30, 2025* (the “**Application**”),<sup>2</sup> filed by Lehotsky Keller Cohn LLP (the “**Applicant**”). The Court orders that:

1. The Applicant is allowed compensation and reimbursement of expenses in the amount of **\$11,671,994.33** for the period set forth in the Application.
2. The compensation and reimbursement of expenses allowed in this Order and all previous interim allowances are approved on a final basis.
3. The Debtors are authorized and directed to disburse **\$9,346,253.33**, which represents the unpaid amounts allowed in paragraphs 1 or 2 of this Order.

<sup>1</sup> 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 (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 Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Application.

4. Applicant is discharged from its role as special counsel in these chapter 11 cases.

Signed: \_\_\_\_\_, 2025.

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**HONORABLE ALFREDO R. PÉREZ**  
**UNITED STATES BANKRUPTCY JUDGE**