

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

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

NOTICE OF DEPOSITION OF PATRICIA B. TOMASCO

PLEASE TAKE NOTICE THAT, pursuant to Rule 9014 and/or Rule 2004 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Local Rule 2004-1 of the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”), and an agreement reached between the Transcend Group and the deponent (Patricia B. Tomasco), Transcend Partners Legend Fund LLC; Valley High LP; GR Fairbairn Family Trust; Grant Fairbairn Revocable Trust; Nina Claire Fairbairn Revocable Trust; NCF Eagle Trust; GRF Tiger Trust; and NC Fairbairn Family Trust (collectively, the “Transcend Group”) will take the oral deposition of **Patricia B. Tomasco** on **October 14, 2025, starting at 11:30 a.m. Central Time** by videoconference (*i.e.*, remote means). Remote login instructions will be provided prior to the deposition. The deposition will be recorded by stenographic means and may also be recorded by audio, video, or audiovisual means and shall continue day-to-day until completed.

Pursuant to Local Rule 2004-1(d) (to the extent such Rule is applicable and the following disclosure is necessary), the Transcend Group hereby appraises Patricia B. Tomasco and all

¹ The Debtors in these chapter 11 cases and the last four digits of their corporate identification numbers are as follows: Rhodium Encore LLC (3974), Jordan HPC LLC (3683), Rhodium JV LLC (5323), Rhodium 2.0 LLC (1013), Rhodium 10MW LLC (4142), Rhodium 30MW LLC (0263), Rhodium Enterprises, Inc. (6290), Rhodium Technologies LLC (3973), Rhodium Renewables LLC (0748), Air HPC LLC (0387), Rhodium Shared Services LLC (5868), Rhodium Ready Ventures LLC (8618), Rhodium Industries LLC (4771), Rhodium Encore Sub LLC (1064), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), and Rhodium Renewables Sub LLC (9511). The mailing and service address of the Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.



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interested parties that the scope of the examination will relate to all aspects of the Amended Joint Chapter 11 Plan of Liquidation for Rhodium Encore LLC and its Affiliated Debtors Proposed by Debtors and Ad Hoc Group of Safe Parties (Doc No. 1750) (the “Proposed Plan”), all issues related to and/or relevant to the Proposed Plan, and all documents and/or communications related to and/or relevant to the Proposed Plan. Such examination is necessary for the Transcend Group to prepare its forthcoming objections to the Proposed Plan.

Dated: October 10, 2025

Respectfully Submitted,

MUNSCH HARDT KOPF & HARR, P.C.

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By: /s/ Chase J. Potter

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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of October, 2025, a true and correct copy of the foregoing document was served electronically through the Court's ECF transmission facilities on all parties registered to receive ECF notice in the above-captioned case.

/s/ Chase J. Potter

Chase J. Potter